



# Accessory Dwelling Units

## FINAL ENVIRONMENTAL IMPACT STATEMENT

October 4, 2018



City of Seattle



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### **Date of Draft EIS Issuance**

May 10, 2018

### **Date Comments Were Due on the Draft EIS**

June 25, 2018

### **Date of Draft EIS Open House and Hearing**

May 31, 2018

### **Date of Final EIS Issuance**

October 4, 2018



**City of Seattle**





October 4, 2018

Dear Affected Agencies, Tribes, Organizations, and Interested Parties,

The City of Seattle is pleased to issue this Final Environmental Impact Statement (EIS), which examines potential environmental impacts of proposed changes to the City's Land Use Code related to accessory dwelling units (ADUs) in single-family zones. The study area includes land zoned single-family residential outside existing urban centers, urban villages, and urban village expansion areas identified in the City's Mandatory Housing Affordability EIS.

ADUs are a key component of meeting our pressing housing needs. By removing regulatory barriers to make it easier for property owners to build attached and detached ADUs, we can increase the number and variety of housing choices in Seattle's single-family zones.

This Final EIS analyzes four alternatives. Alternative 1 (No Action) assumes that the City makes no changes to the Land Use Code related to ADUs. Alternative 2, Alternative 3, and the Preferred Alternative all assume implementation of Land Use Code changes that would increase the number of ADUs produced in Seattle's single-family zones. These action alternatives address regulations and policies frequently cited as barriers to the creation of ADUs. They differ in the scale and focus of the proposed changes. Alternative 2 represents a broad range of changes to the Land Use Code focused on removing barriers to creating ADUs. Alternative 3 considers more modest adjustments to the Land Use Code that emphasize maintaining the scale of existing development in single-family zones. The Preferred Alternative combines elements of Alternatives 2 and 3. Its composition reflects analysis contained in the Draft EIS and comments received during the Draft EIS comment period.

Publication of the Final EIS completes the environmental review process for this proposal, unless the City Council considers substantial changes outside the range of alternatives previously considered. In 2019, after considering the EIS alternatives and holding a public hearing, the City Council will consider whether to adopt changes to the Land Use Code related to ADUs.

For more information, please visit [seattle.gov/council/ADU-EIS](http://seattle.gov/council/ADU-EIS). Thank you for your interest in Seattle's effort to create new housing choices in our single-family zones.

Sincerely,

A handwritten signature in black ink, appearing to read "Ketil Freeman".

Ketil Freeman, AICP  
City Council Central Staff



# Fact Sheet

## PROJECT TITLE

City of Seattle Accessory Dwelling Units Environmental Impact Statement

## PROPOSED ACTION AND ALTERNATIVES

The proposed action is to amend the City's Land Use Code to remove barriers to the construction of accessory dwelling units (ADUs) in single-family zones. The objectives of the proposal are to:

- Remove regulatory barriers to make it easier for property owners to permit and build attached and detached ADUs.
- Increase the number and variety of housing choices in single-family zones.

This EIS analyzes four alternatives. Alternative 1 (No Action) assumes that the City makes no changes to the Land Use Code related to ADUs. Alternative 2, Alternative 3, and the Preferred Alternative all assume implementation of Land Use Code changes that would increase the number of ADUs produced in Seattle's single-family zones. The action alternatives address regulations and policies frequently cited as barriers to the creation of ADUs.

Alternative 2, Alternative 3, and the Preferred Alternative differ in the scale and focus of the proposed changes. Alternative 2 represents a broad range of changes to the Land Use Code intended to remove regulatory barriers to ADU production. Alternative 3 considers more modest adjustments to the Land Use Code that emphasize maintaining the scale of existing development in single-family zones. The Preferred Alternative combines elements of Alternatives 2 and 3. Its composition reflects analysis contained in the Draft EIS and comments received during the Draft EIS comment period.

## LOCATION

The study area for this EIS includes land zoned single-family that is located outside of existing urban centers, urban villages, and urban village expansion areas identified in the Mandatory Housing Affordability EIS.

## PROPONENT

City of Seattle

## LEAD AGENCY

Seattle City Council

## RESPONSIBLE SEPA OFFICIAL

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## REQUIRED APPROVALS

After considering the EIS alternatives and holding a public hearing, the Seattle City Council will decide whether to adopt proposed changes to the Land Use Code related to ADUs.

## APPROXIMATE DATE OF CITY COUNCIL DECISION

First Quarter, 2019

## TYPE AND TIMING OF SUBSEQUENT ENVIRONMENTAL REVIEW

Publication of the Final EIS completes the environmental review process for the proposed action, unless the City Council considers substantial changes outside the range of alternatives previously considered.

## PRINCIPAL EIS AUTHORS AND CONTRIBUTORS

This Final EIS has been prepared under the direction of the Seattle City Council's Central Staff. The following consulting firms provided research and analysis associated with this EIS:

- **HDR:** Lead EIS consultant
- **ECONorthwest:** Environmental analysis of housing and socioeconomics
- **Toole Design Group:** Environmental analysis of transportation and parking; and public services and utilities
- **Broadview Planning:** Environmental analysis of land use; review and advise on the description of the proposal and alternatives
- **Scarlet Plume:** Technical editing

## DATE OF DRAFT EIS ISSUANCE

**May 10, 2018**

## CLOSE OF DRAFT EIS COMMENT PERIOD

**June 25, 2018**

## DATE AND LOCATION OF DRAFT EIS OPEN HOUSE AND HEARING

**May 31, 2018, 5:30 p.m.**

Seattle City Hall, 600 4th Ave, Bertha Knight Landes room

## LOCATION OF BACKGROUND DATA

Office of Seattle City Council  
Central Staff

## FINAL EIS AVAILABILITY AND PURCHASE PRICE

Copies of this Final EIS have been distributed to agencies, organizations, and individuals, as established in SMC 25.05. Notice of Availability of the Final EIS has been provided to organizations and individuals that requested to become parties of record.

A copy of the Final EIS is also available for public review at the Central Library branch of the Seattle Public Library (1000 4th Ave).

A limited number of complimentary copies of this Final EIS are available — while the supply lasts — as an electronic CD from the Seattle Department of Construction and Inspections (SDCI) Public Resource Center, located in Suite 2000, 700 5th Ave, in downtown Seattle. Additional copies may be purchased at the Public Resource Center for the cost of reproduction.

This Final EIS and the appendices are also available online at [seattle.gov/council/ADU-EIS](http://seattle.gov/council/ADU-EIS).

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# 1 Summary

The City of Seattle (City) has prepared this ~~draft~~ Final Environmental Impact Statement (EIS) to evaluate the potential environmental impacts of proposed changes to the City's Land Use Code intended to remove barriers to the creation of accessory dwelling units (ADUs). This EIS has been prepared to meet requirements of the Washington State Environmental Policy Act (SEPA, Chapter 43.21C Revised Code of Washington [RCW]).

This chapter summarizes the findings of this Final EIS, including description and analysis of a Preferred Alternative that combines elements of the action alternatives evaluated in the Draft EIS. This Final EIS also contains additional analysis of topics identified for further study based on Draft EIS comments.

This Final EIS identifies changes we have made to the text since issuing the Draft EIS with underline and ~~strikeout~~. Where an entirely new section or exhibit is added, we identify these more substantial changes with a note in the margin.

### Accessory Dwelling Units (ADUs)

---

A detached accessory dwelling unit (DADU) is a secondary unit located in a separate structure from the principal dwelling unit (i.e., the main house).

DADUs are often called backyard cottages and carriage houses.

An attached accessory dwelling unit (AADU) is a secondary unit located within or connected to the main house. AADUs are often called in-law apartments, basement apartments, garden apartments, units or and granny flats.

## 1.1 Proposal Overview

The City proposes to change regulations in the Land Use Code to remove regulatory barriers to the creation of 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 several Land Use Code changes, including allowing two ADUs on some lots, changing the existing off-street parking and owner-occupancy requirements, and changing some development standards that regulate the size and location of DADUs.

ADUs have been allowed citywide as part of a main house or in the backyard of lots in single-family zones since 1994 and 2010, respectively. The City's proposal would modify the rules that regulate when and where a property owner can create an ADU to make it easier for property owners to permit and build AADUs and DADUs. These policy changes would affect future development in Seattle's single-family zones.

We are using the EIS process to analyze potential changes to the Land Use Code to increase ADU production that will ultimately be proposed for action by the City Council. This Final EIS evaluates the two action alternatives included in the Draft EIS, Alternatives 2 and 3, and a Preferred Alternative. All action alternatives containing a range of potential changes to the Land Use Code. ~~The Final EIS may include modified alternatives or identify a preferred alternative. A modified or preferred alternative could combine elements of the Land Use Code changes proposed under Alternative 2 or Alternative 3.~~ The study area for this EIS includes land zoned single-family outside existing urban villages and urban village expansion areas studied in the Mandatory Housing Affordability (MHA) EIS.

## 1.2 Proposal Objective

A proposal's objective plays a key role in determining the range of alternatives considered and analyzed in an EIS. The objective guides the lead agency in selecting a preferred alternative and eliminates some alternatives from further consideration. The historical and planning context described in Chapter 3 informed the development of the proposal and its objectives. The proposal evaluated in this EIS follows staff review requested in [Council Resolution 31547](#) and builds on the work of the Housing Affordability and Livability Agenda (HALA) Advisory Committee, whose final recommendations identified measures to boost ADU

production as one of several strategies for increasing housing choices in Seattle (HALA Advisory Committee 2015). Currently, about two percent of Seattle's roughly 135,000 lots in single-family zones have an ADU. Since their legalization citywide in 2010, about 579 DADUs have been constructed or permitted.

The objective of this proposal is to implement Seattle's Comprehensive Plan (Seattle 2016a) policies related to development of ADUs. The Comprehensive Plan, which is the 20-year roadmap for the city's future, contains goals and policies intended to support four core values: race and social equity, environmental stewardship, community, and economic security and opportunity. Under Washington's Growth Management Act (GMA), counties and large cities must create and regularly update comprehensive plans to identify where growth will unfold and to plan for housing, transportation, water, sewer, and other necessary facilities. Zoning and development standards are one way the City implements the policy direction outlined in the Comprehensive Plan. With this proposal, the City aims to implement Comprehensive Plan policies related to ADUs:

**Land Use Policy 7.5** Encourage accessory dwelling units, family-sized units, and other housing types that are attractive and affordable, and that are compatible with the development pattern and building scale in single-family areas in order to make the opportunity in single-family areas more accessible to a broad range of households and incomes, including lower-income households.

**Land Use Policy 7.12** Emphasize measures that can increase housing choices for low-income individuals and families when considering changes to development standards in single-family areas.

The objectives of this proposal of are to:

- Remove regulatory barriers to make it easier for property owners to permit and build AADUs and DADUs
- Increase the number and variety of housing choices in single-family zones

## 1.3 Planning Context

In September 2014, the City Council adopted [Resolution 31547](#) (Seattle City Council 2014) directing Department of Planning and Development staff, now at the Office of Planning and Community Development (OPCD), to explore policy changes that would spur creation of both AADUs and

DADUs. Council directed OPCD staff to examine regulatory changes, incentives, and marketing and promotion strategies to boost ADU production. In response to the Council Resolution, OPCD proposed Land Use Code changes similar to changes analyzed in this EIS.

In May 2016, OPCD prepared an environmental checklist evaluating the potential environmental impacts of the proposed changes to the Land Use Code, and issued a determination of non-significance. The determination of non-significance 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 (Tanner 2016). Based on the Hearing Examiner's decision, the Seattle City Council prepared this Environmental Impact Statement (EIS) in accordance with the Washington State Environmental Policy Act (SEPA).

Chapter 3 discusses the history of and context for the proposal in greater detail.

## **1.4 Environmental Impact Statement Process**

In May 2016, we prepared an environmental checklist evaluating the potential environmental impacts of the proposed changes to the Land Use Code and made a determination of non-significance (Seattle 2016c). The determination made 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 (Tanner 2016). 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 has been prepared in accordance with SEPA. The SEPA environmental review process includes the steps described below.

### **EIS SCOPING PROCESS**

The first step in the development of an EIS is called scoping. During the scoping process, agencies, tribes, local communities, organizations, and the public are invited to comment on factors that the EIS should analyze and consider. Specifically, the process is intended to collect input on the following topics:

- Reasonable range of alternatives
- Potentially affected resources and the extent of analysis for those resources
- Measures to avoid, minimize, and mitigate impacts of the proposal
- Potential cumulative impacts

The scoping period was announced via the proposal website, published in the City's Land Use Information Bulletin and in the *Daily Journal of Commerce*, and posted to an email listserv that we maintain. The original scoping period for the proposal was scheduled for 30 days from October 2 to November 1, 2017. Based on comments received during the scoping period, it was extended by an additional 15 days to close on November 16, 2017. We also hosted two public scoping meetings on October 17, 2017, in West Seattle and October 26, 2017, in Ballard. We accepted comments through an online comment form on the proposal website, by email, and via written letters and comment forms. In total, we received 1,048 scoping comments. The Accessory Dwelling Units Environmental Impact Statement Scoping Report documents the scoping process (Seattle 2018). As described below, we ~~will seek~~ collected further input during the Draft EIS public comment period.

## **DRAFT EIS PREPARATION, PUBLICATION, AND REVIEW**

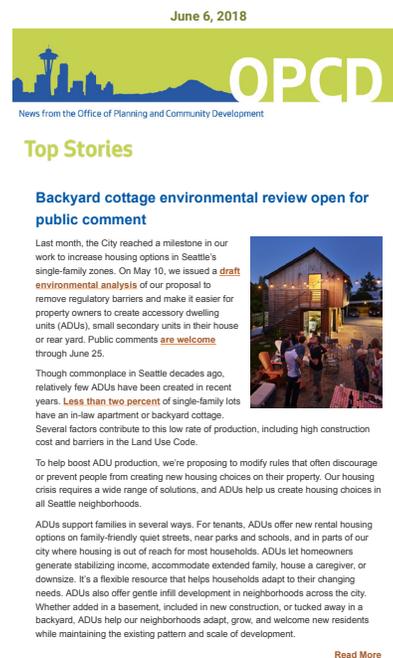
Following the completion of scoping, a Draft EIS is prepared. The purpose of an EIS is to provide an impartial discussion of the potential for significant environmental impacts and reasonable alternatives and mitigation measures that avoid or minimize adverse environmental impacts. The information in ~~this~~ the Draft EIS is was provided for review and comment by interested parties and ~~will also~~ helped us evaluate the proposal and develop the Preferred Alternative analyzed in this Final EIS.

We issued the Draft EIS on May 10, 2018, and announced its availability in the City's Land Use Information Bulletin and in the *Daily Journal of Commerce*. The document was posted on the project website at [seattle.gov/council/ADU-EIS](http://seattle.gov/council/ADU-EIS). We sent an email notification to the listserv we maintain and to everyone who had commented and provided their email address during the scoping period. As shown in Exhibit 1-1, we also publicized the Draft EIS in the OPCD newsletter and through the City's various social media channels.

We ~~will seek~~ collected comments from agencies, tribes, local communities, organizations, and the public during a 45-day comment period from May 10 to June 25, 2018. A public hearing ~~will be~~ was held on May 31, 2018. ~~The~~

hearing will be held at Seattle City Hall (600 4th Avenue, 1st floor) in the Bertha Knight Landes room. We will accept comments by mail, through an online comment form, via email, and at the public meeting (orally and in writing). Comments received during the comment period will be addressed in the Chapter 5 of this Final EIS.

## Exhibit 1-1 Draft EIS Announcements via Twitter and Email Newsletter



New in the FEIS Exhibit 1-1 is new in the Final EIS.

## FINAL EIS PUBLICATION

Following the Draft EIS comment period, we will issue the prepared this Final EIS. The This Final EIS will address comments received during the comment period and may include additional information and input received from agencies, tribes, local communities, organizations, and the public regarding the proposal. We will use the this Final EIS to inform the legislative process. The This Final EIS may include modified slight revisions to the action alternatives evaluated in the Draft EIS and identifies or identify a preferred alternative.

## 1.5 Summary of Issues of Concern

The December 2016 Hearing Examiner decision identified several issues of concern for additional analysis in this EIS. These include evaluating and focusing the impacts discussion on:

- Housing and Socioeconomics (Section 4.1)
- Land Use (Section 4.2)
- Aesthetics (Section 4.3)
- Parking and Transportation and (Section 4.4)
- Public Services and Utilities (Section 4.5)

No additional elements of the environment were identified as a result of the City's subsequent EIS scoping process. In addition, in the scoping notice for this EIS, we presented two potential alternatives: Alternative 1 (No Action) and Alternative 2 (the proposed Land Use Code changes). However, based on comments received during the scoping period, we added a second action alternative for evaluation in ~~this~~ the Draft EIS (Alternative 3). Alternative 3 considers more modest adjustments to the Land Use Code that emphasize allowing a variety of housing types while maintaining a scale compatible with existing development in single-family zones.

Based on the scoping comments received, the specific parameters considered under Alternative 3 include retaining the owner-occupancy requirement and eight-person maximum household size limit, adding ~~MHA requirements~~ incentives for affordable housing, requiring an off-street parking space for lots with a second ADU, and incorporating maximum floor area ratio (FAR) limits.

Based on the analysis contained in the Draft EIS and comments received during the public comment period, we evaluate a Preferred Alternative in this Final EIS. We outline each alternative further in Chapter 2.

## 1.6 Summary of Alternatives

This Final EIS analyzes three alternatives included in the Draft EIS and an additional Preferred Alternative. The City expects to prepare legislation implementing Land Use Code changes resembling the Preferred Alternative for City Council action. Further refinement to the proposal may occur through the Council's legislative process, during which time

there will be additional opportunities for public input. Any refinement to the proposal would be within the range of changes considered in this EIS.

This Final EIS considers four alternatives. Alternative 1 (No Action) assumes that the City makes no changes to the Land Use Code related to ADUs. ~~Alternatives 2, Alternative and 3, and the Preferred Alternative~~ all both assume implementation of Land Use Code changes that would increase the number of ADUs produced in Seattle's single-family zones. ~~Both~~ All action alternatives address regulations and policies frequently cited as barriers to creation of ADUs.

~~Alternatives 2, Alternative and 3, and the Preferred Alternative~~ differ in the scale and focus of the proposed changes. Alternative 2 represents ~~the broadest~~ a broad range of changes to the Land Use Code intended to remove regulatory barriers to the creation of ADUs, similar to the draft proposal analyzed in May 2016 prior to the Hearing Examiner's decision. Alternative 3 considers more modest adjustments to the Land Use Code that emphasize maintaining the scale of existing development in single-family zones. The Preferred Alternative combines elements of Alternatives 2 and 3. Its composition reflects analysis contained in the Draft EIS and comments we received on that document during the comment period.

## 1.7 Summary of Impacts and Mitigation

This section provides a brief overview of the analysis for each element of the environment and then summarizes the potential impacts and mitigation measures proposed (see Exhibit 1-1). The potential impacts from the proposed Land Use Code changes are detailed in Chapter 4 of this EIS. We encourage readers to review the more comprehensive discussion of issues in Chapter 4 to formulate the most accurate impression of impacts associated with the alternatives.

To evaluate the potential impacts of the proposed Land Use Code changes, the housing and socioeconomics analysis in Section 4.1 evaluated the number of ADUs that could be created given the proposed Land Use Code changes under each alternative. Based on comments received on the Draft EIS, we slightly modified the methodology for estimating ADU production under each alternative. For this reason, the Final EIS includes updated estimates of ADUs created under all alternatives, not only the Preferred Alternative. These updates,

shown with underline and strikethrough throughout the document, reflect methodological updates described below.

The results of this analysis indicate that ~~both Alternatives 2, Alternative and 3, and the Preferred Alternative~~ would all increase the production of ADUs citywide compared to Alternative 1. Under Alternative 1 (No Action) we estimate that approximately ~~1,890~~ 1,970 ADUs would be created between 2018 and 2027. In comparison, we estimate that Alternative 2 would result in approximately ~~3,330~~ 4,280 ADUs over the same 10-year period, while Alternative 3 would result in approximately ~~3,100~~ 3,400 ADUs. The Preferred Alternative would result in 4,430 ADUs. We also found that ~~both Alternatives 2 and 3~~ all action alternatives are likely to reduce the number of teardowns of existing houses compared to Alternative 1 (No Action). We expect the overall number of teardowns to decrease from ~~2,610~~ 2,030 under Alternative 1 (No Action) to ~~2,460~~ 1,800 under Alternative 2, ~~and 2,220~~ 1,670 under Alternative 3, ~~and 1,580~~ under the Preferred Alternative, including fewer teardowns in lower-price neighborhoods specifically.

This rate of production of new ADUs and teardowns of existing houses was then applied to the analysis of the potential impacts to the elements of the environment evaluated in this EIS, including housing and socioeconomics; land use; aesthetics; parking and transportation; and public services and utilities. Exhibit 1-2 presents the approach to each analysis, potential impacts, and mitigation.

## 1.8 Methodology Updates Since Issuance of the Draft EIS

Central to this analysis are estimates of ADU production and single-family teardowns included in Section 4.1. Based on feedback received on the Draft EIS, we updated our methodology for calculating these estimates. We summarize these updates below. For complete details, see Section 4.1 and Appendix A.

### Considering potential cost reductions

In the Draft EIS, Alternative 2 contemplated a reduction of 10 percent in predevelopment costs for DADUs that represented potential reductions in permitting time and costs. Since publishing the Draft EIS, we have further refined the likely scenarios that could affect ADU costs. Because these potential cost reductions reflect possible City actions independent

### New in the FEIS

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Section 1.8 is new in the Final EIS.

of the proposed Land Use Code changes, we apply them in all alternatives in the Final EIS. They would proceed with or without the proposed action. The purpose of the EIS is to identify likely impacts of the proposal itself using our best estimate of the future. To develop conservative estimates (i.e., higher ADU production) we consider cost reductions as we evaluate future impacts. All alternatives in the Final EIS include reduced architecture/engineering fees and reduced permit fees resulting from possible City efforts to develop pre-approved DADU plans that save time and money for people building an ADU. All alternatives also contemplate lower construction costs for DADUs that could result from public- and private-sector-led efforts to reduce construction costs. Collectively, these cost reductions increase the relative feasibility of ADUs in our pro forma analysis, and we factor this change as part of the adjustment factors used in the ADU production model.

### **Identifying individual adjustment factors**

This EIS uses a deterministic model to estimate future ADU production and single-family teardowns based on the underlying factors that explain historical development outcomes. Because certain policies in the action alternatives that would affect ADU production are not present in the historical record, we need to adjust our ADU production estimates upward to account fully for the proposed policy changes. Exhibit A-39 of the Draft EIS summarized several adjustment factors included in our estimates of ADU production and single-family teardowns. Based on feedback on the Draft EIS, we have made two changes to these adjustment factors in this Final EIS. First, we itemize and quantify each adjustment factor individually, rather than summarizing the collective effects as a single percentage increase. Second, we modify the factors themselves to ensure we are conservatively estimating the potential increase in ADU production resulting from policy changes. See Exhibit A-46 in Appendix A for a full accounting of these adjustment factors.

### **Estimating effects of changing the owner-occupancy requirement**

One adjustment factor included in the Draft EIS accounted for the effect of removing the owner-occupancy requirement in Alternative 2. Since it is a new policy, we cannot estimate this effect based on the historical record. Instead, the Draft EIS adjusted ADU production estimates upward in part to account for this policy change. Based on feedback on the Draft EIS, we have improved our approach to this policy change in the Final EIS. Since removing the owner-occupancy requirement enables roughly one-fifth of study area lots to have an ADU, we consider this expanded

"universe" of eligible lots when estimating ADU production for Alternative 2 and the Preferred Alternative. This results in slightly higher ADU production estimates compared to the Draft EIS.

### **Incorporating ADUs produced through the BLOCK Project**

The BLOCK Project is an independent effort to address homelessness through ADUs. The BLOCK Project places small, off-grid DADUs (i.e., about 125 square feet) in the rear yards of homeowners who volunteer to house an individual experiencing homelessness. Though fully separate from the action evaluated in this Final EIS, we adjust our ADU production estimates upward in all alternatives to account for ADUs created through the BLOCK Project. Between 2018 and 2027, we use a conservative estimate of 100 additional DADUs.

Exhibit 1-2 Summary of Approach, Impacts, and Mitigation

**HOUSING AND SOCIOECONOMICS**

	Alternative 1 (No Action)	Alternative 2	Alternative 3	Preferred Alternative
<b>Approach</b>	The analysis of housing and socioeconomic impacts considered how proposed Land Use Code changes could alter the underlying real-estate economics in single-family zones. We considered the impacts the proposal could have on housing affordability and displacement.			
<b>Impacts</b>	<p>Housing affordability and displacement in the study area would continue to be a concern and burden for many Seattle residents. The creation of fewer ADUs under Alternative 1 (No Action) compared to both action alternatives would result in fewer housing options available in the study area, putting greater upward pressure on housing prices and resulting in greater potential for economic displacement compared to the action alternatives. Alternative 1 (No Action) would result in marginally more teardowns than both action alternatives, resulting in greater potential for physical displacement.</p>	<p>While the affordability of housing would remain a concern and burden for many Seattle residents, the creation of additional ADUs under Alternative 2 would increase the number of housing choices available in the study area compared to Alternative 1 (No Action). This would have a positive impact on affordability and decrease the potential for economic displacement because the additional housing supply could marginally reduce upward pressure on rents and housing prices. Alternative 2 could result in fewer teardowns than Alternative 1 (No Action), which would reduce the potential for physical displacement.</p>	<p>The beneficial impacts on housing affordability under Alternative 3 would be similar to, but slightly less than, Alternative 2 since fewer ADUs would be created. Of the three alternatives compared to Alternatives 1 and 2, we estimate that Alternative 3 would result in the fewest fewer teardowns, giving it the greatest potential to reduce reducing physical displacement impacts.</p>	<p>The beneficial impacts on housing affordability under the Preferred Alternative would be similar to, but slightly greater than, Alternative 2 since more ADUs would be created. Of the four alternatives, we estimate that the Preferred Alternative would result in the fewest teardowns, yielding the greatest potential to reduce physical displacement impacts.</p>
<b>Mitigation</b>	n/a	Based on the results of the analysis, the proposed Land Use Code changes would have marginal benefits on housing affordability and would not increase displacement impacts. Therefore, no mitigation measures are proposed.		

## LAND USE

	Alternative 1 (No Action)	Alternative 2	Alternative 3	Preferred Alternative
<b>Approach</b>	We evaluated the potential land use impacts by considering whether the proposed Land Use Code changes would result in changes to building density, population density, or scale that would be incompatible with existing development in Seattle's single-family zones.			
<b>Impacts</b>	<p>We anticipate negligible impacts to building and population density from the ADUs constructed over time. There would be no change to the scale of ADUs allowed under existing Land Use Code regulations.</p>	<p>Minor impacts could occur from increases in building and population density. Likewise, Alternative 2 could result in minor changes in building scale from allowing slightly larger DADUs on smaller lots than currently allowed. Localized impacts could occur if ADU production is higher in a concentrated area, such as a particular block in the study area.</p>	<p>Minor impacts could occur from increases in building density and population density. Like Alternative 2, minor changes in building scale could result from allowing slightly larger DADUs on smaller lots than currently allowed. These changes would be slightly less than Alternative 2, as Alternative 3 includes a floor area ratio (FAR) limit that would limit the size of detached single-family houses. Localized impacts could occur if ADU production is higher in a concentrated area, such as a particular block in the study area.</p>	<p>Similar to Alternatives 2 and 3, the Preferred Alternative could result in minor impacts from increases in building density and population density. Like Alternative 3, minor changes in building scale would be slightly less than Alternative 2, as the Preferred Alternative includes an FAR limit. Localized impacts could occur if ADU production is higher in a concentrated area, such as a particular block in the study area.</p>
<b>Mitigation</b>	n/a	No significant adverse impacts to land use are anticipated; therefore, no mitigation measures are proposed.		

## AESTHETICS

	Alternative 1 (No Action)	Alternative 2	Alternative 3	Preferred Alternative
<b>Approach</b>	We consider aesthetic impacts by evaluating how the proposed Land Use Code changes would affect the visual character of single-family zones. We analyzed the potential aesthetic impacts using three-dimensional visual modeling to illustrate the potential changes to the scale and form of development in the study area.			
<b>Impacts</b>	<p>Compared to Alternatives 2 and 3, Alternative 1 (No Action) would result in more teardowns, more lots with large new houses, and fewer ADUs overall. Ongoing changes in aesthetics resulting from tearing down existing houses and rebuilding new houses would continue.</p>	<p>We do not anticipate that the increase in construction of ADUs and the decrease in the number of houses torn down when compared to Alternative 1 (No Action) would result in aesthetic impacts. Alternative 2 is not expected to result in a fundamental change in visual character of neighborhoods where additional ADUs would be constructed as new ADUs would likely be dispersed throughout neighborhoods in the city. If a concentration of ADUs did arise in a particular neighborhood, localized aesthetic impacts could occur but would be minor. The reduction in the number of houses torn down would help retain the existing overall aesthetic character of neighborhoods in the study area since new single-family houses erected following teardowns are often visually distinct from existing structures due to differences in architectural style, scale, and proportions.</p>	<p>Alternative 3 represents more modest changes to the Land Use Code when compared to Alternative 2. The aesthetics impacts from Alternative 3 would be very similar to, but slightly less than, those described under Alternative 2 due to the introduction of the FAR limit. Like Alternative 2, a concentration of ADUs in a particular subarea or neighborhood could result in localized aesthetic impacts, but impacts would be minor.</p>	<p><u>Aesthetic impacts from the Preferred Alternative would be very similar to, but slightly less than, those described under Alternative 2. The introduction of the FAR limit would reduce aesthetic impacts that could result from construction of new single-family houses. Like Alternative 2, if a concentration of ADUs occurred in a particular subarea or neighborhood, localized aesthetic impacts could occur but would be minor. Similarly, fewer demolitions under the Preferred Alternative compared to all other alternatives would help retain the existing overall aesthetic character of neighborhoods in the study area.</u></p>
<b>Mitigation</b>	n/a	No significant adverse impacts to aesthetics are anticipated; therefore, no mitigation measures are proposed.		

## PARKING AND TRANSPORTATION

	Alternative 1 (No Action)	Alternative 2	Alternative 3	Preferred Alternative
<b>Approach</b>	<p><i>Parking.</i> We compared the existing availability of on-street parking with the expected increase in demand for on-street parking under each alternative. We assumed that on-street parking utilization would not become an issue until parking utilization exceeded 85 percent.</p> <p><i>Transportation.</i> We considered how the overall changes in population anticipated under each alternative would affect the service levels of existing transportation networks in the context of the growth and impacts considered in the Comprehensive Plan EIS (Seattle 2016b).</p>			
<b>Impacts</b>	<p><i>Parking.</i> ADU production would not have a significant adverse impact on the availability of on-street parking throughout the study area.</p> <p><i>Transportation.</i> The impacts to the transportation system would not differ from those described in the Comprehensive Plan EIS, which found that there would not be significant impacts to the transportation network.</p>	<p><i>Parking.</i> We do not expect increased parking demand resulting from ADU production to exceed existing on-street parking availability under typical conditions. However, there may be some specific blocks within the study area where on-street parking utilization does, or will in the future, exceed parking supply. In those instances, some localized impacts on the availability of on-street parking may occur.</p> <p><i>Transportation.</i> The impacts to the transportation system would not differ from those described in the Comprehensive Plan EIS, which found that there would not be significant impacts to the transportation network.</p>	<p><i>Parking.</i> We do not expect increased parking demand resulting from ADU production to exceed existing on-street parking availability under typical conditions. However, there may be some specific blocks within the study area where on-street parking utilization does, or will in the future, exceed parking supply. In those instances, some localized impacts on the availability of on-street parking may occur.</p> <p><i>Transportation.</i> The impacts to the transportation system would not differ from those described in the Comprehensive Plan EIS, which found that there would not be significant impacts to the transportation network.</p>	<p><i>Parking.</i> The parking impacts from the Preferred Alternative would be very similar to, but slightly greater than, those described under Alternative 2 due to slightly higher ADU production (we estimate the Preferred Alternative would result in 150 more ADUs compared to Alternative 2). On some specific blocks in the study area where on-street parking utilization does, or will in the future, exceed parking supply, localized impacts on the availability of on-street parking could occur.</p> <p><i>Transportation.</i> The impacts to the transportation system would not differ from those described in the Comprehensive Plan EIS, which found that there would not be significant impacts to the transportation network.</p>
<b>Mitigation</b>	n/a	<p>The parking analysis did not identify potential significant adverse impacts. No mitigation measures are required. However, the City will continue to respond to changes to parking supply in specific areas that currently have or are projected to have high parking utilization. If issues arise, the City will rely upon use of regulations in the municipal code. No mitigation for transportation impacts is under consideration.</p>		

## PUBLIC SERVICES AND UTILITIES

	Alternative 1 (No Action)	Alternative 2	Alternative 3	Preferred Alternative
<b>Approach</b>	We evaluated potential impacts to public services and utilities by considering the overall changes in population anticipated under each alternative relative to the existing service levels for each public service and utility.			
<b>Impacts</b>	<p>Development of ADUs would continue as under existing conditions. Overall demand for public services and utilities would continue to increase with population growth; however, Seattle Public Utilities, Seattle City Light, Seattle Public Schools, Seattle Police Department, and Seattle Fire Department, anticipate and continue to plan for this growth.</p> <p>Overall, increased sewer demand resulting from ADU construction will not substantially impact sewer capacity. In some specific locations within the study area, the existing wastewater system may already be at or exceed capacity. A large concentration of ADUs constructed in an area tributary to these problems could yield a corresponding rise in sanitary sewer overflows (SSO).</p>	<p>Alternative 2 could result in about 2,160 3,465 additional ADU residents over 10 years compared to Alternative 1 (No Action). Even if this resulted in a corresponding increase of 2,160 3,465 new Seattle residents, we do not anticipate this growth would result in impacts on the ability of Seattle Public Utilities, Seattle City Light, Seattle Public Schools, Seattle Police Department, and Seattle Fire Department to provide service.</p> <p>Overall, increased sewer demand resulting from ADU construction will not substantially impact sewer capacity. In some specific locations within the study area, the existing wastewater system may already be at or exceed capacity. A large concentration of ADUs constructed in an area tributary to these problems could yield a corresponding rise in sanitary sewer overflows (SSO).</p>	<p>Alternative 2 could result in about 4,815 2,145 additional ADU residents over 10 years compared to Alternative 1 (No Action). Even if this resulted in a corresponding increase of 4,815 2,145 new Seattle residents, we do not anticipate this growth would result in impacts on the ability of Seattle Public Utilities, Seattle City Light, Seattle Public Schools, Seattle Police Department, and Seattle Fire Department to provide service.</p> <p>Overall, increased sewer demand resulting from ADU construction will not substantially impact sewer capacity. In some specific locations within the study area, the existing wastewater system may already be at or exceed capacity. A large concentration of ADUs constructed in an area tributary to these problems could yield a corresponding rise in sanitary sewer overflows (SSO).</p>	<p>The Preferred Alternative could result in about 3,690 additional ADU residents over 10 years compared to Alternative 1 (No Action). Even if this resulted in a corresponding increase of 3,690 new Seattle residents, we do not anticipate this growth would result in impacts on the ability of Seattle Public Utilities, Seattle City Light, Seattle Public Schools, Seattle Police Department, and Seattle Fire Department to provide service.</p> <p>Overall, increased sewer demand resulting from ADU construction will not substantially impact sewer capacity. In some specific locations within the study area, the existing wastewater system may already be at or exceed capacity. A large concentration of ADUs constructed in an area tributary to these problems could yield a corresponding rise in sanitary sewer overflows (SSO).</p>
<b>Mitigation</b>	n/a	No significant adverse impacts are anticipated to public services and utilities; therefore, no mitigation measures are proposed.		

## 1.9 Cumulative Impacts

SEPA requires that the City consider the cumulative impacts of the proposal in this EIS ([WAC 197-11-060](#)). A cumulative impact is defined as the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts can result from individually minor but collectively significant actions occurring during a determined timeframe. In this cumulative impact analysis, we consider the proposed Land Use Code changes in the context of the historical, continuing, and future development in single-family zones in the study area of the EIS. There are no other planned code or zoning changes to single-family zones in the study area that would change the present development conditions. Therefore, we did not consider any reasonably foreseeable future actions in this analysis. The effects analysis that follows in Chapter 4 considers the existing and continuing development environment in Seattle. The impacts reported in Chapter 4 would be negligible when considered in the context of changes occurring throughout the city. Therefore, we do not anticipate cumulative impacts due to the proposed Land Use Code changes.

## 1.10 Benefits and Disadvantages of Delaying Implementation

SEPA requires that an EIS discuss the benefits and disadvantages of delaying implementation of a proposal ([WAC 197-11-440\(5\)\(c\)\(vii\)](#)). The urgency of implementing the proposal can be compared with any benefits of delay. The EIS should also consider the foreclosure of other options, or whether implementation of the proposal would preclude implementation of another proposal in the future. If this proposal were postponed, the beneficial impacts on housing affordability and reduced economic and physical displacement would be delayed. Minor localized land use, aesthetics, and parking, and utilities impacts would also be delayed. Implementation of this proposal would not preclude implementation of another proposal in the future.

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## 2 Alternatives

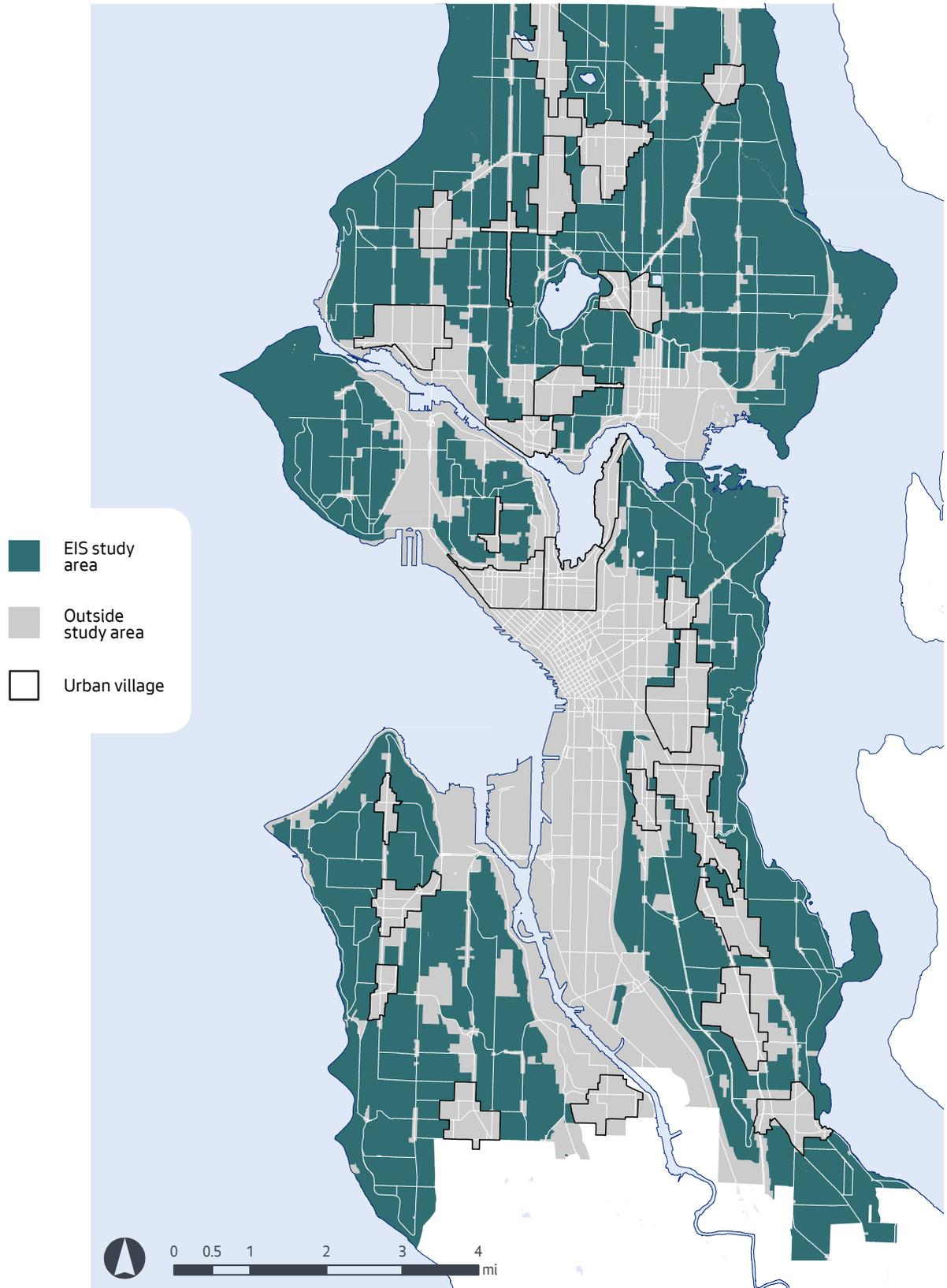
The City of Seattle (City) proposes to change regulations in the Land Use Code to remove barriers to the creation of ADUs in single-family zones. The objectives of the proposal evaluated in this EIS are to:

- Remove regulatory barriers to make it easier for property owners to permit and build AADUs and DADUs
- Increase the number and variety of housing choices in single-family zones

### 2.1 Study Area

The study area for this EIS includes land zoned single-family outside existing urban villages and urban village expansion areas studied in the Mandatory Housing Affordability (MHA) EIS (Exhibit 2-1).

Exhibit 2-1 Map of the EIS Study Area



## 2.2 Development of Alternatives

In the scoping notice (Seattle City Council 2017), we initially proposed to study two alternatives: Alternative 1 (No Action) and one action alternative that considered changes to the Land Use Code. During the scoping comment period, we received several comments encouraging us to add a second action alternative. Some comments suggested this third alternative should consider a more aggressive scenario that allows duplexes, triplexes, and small apartments in the study area and considers smaller minimum lot sizes for subdivision in single-family zones. Others requested that we study an alternative whose intensity is between the two alternatives we initially proposed by excluding certain changes intended to spur ADU production, or that we study an alternative that further restricts ADU production compared to current policies. However, the objective of the proposal is to increase the production of ADUs in single-family zones. Changes that would allow lots in single-family zones to be subdivided for separate ownership of principal units, or that would allow traditional duplexes or triplexes, are outside the scope of this proposal. Similarly, changes to zoning designations for land in the study area, such as rezoning areas to the Residential Small Lot (RSL) zone, are outside the scope of this proposal.

While some policies suggested during scoping do not meet the project's objectives, based on scoping comments we ~~propose to~~ evaluated three alternatives in ~~this~~ the Draft EIS. Alternative 1 (No Action) assumes that the City makes no changes to the Land Use Code related to ADUs. Alternatives 2 and 3 both assume implementation of Land Use Code changes that would increase the number of ADUs produced in Seattle's single-family zones. Both action alternatives address regulations and policies frequently cited as barriers to creation of ADUs. Alternatives 2 and 3 differ in the scale and focus of the proposed changes. Alternative 2 represents ~~the broadest~~ a broad range of changes to the Land Use Code intended to remove regulatory barriers, similar to the draft proposal analyzed in May 2016 prior to the Hearing Examiner's decision. Alternative 3 considers more modest adjustments to the Land Use Code that emphasize maintaining the scale of existing development in single-family zones.

Based on findings in the Draft EIS and comments received during the Draft EIS comment period, we developed a Preferred Alternative that combines elements of Alternatives 2 and 3. Like the action alternatives analyzed in the Draft EIS, the Preferred Alternative would implement Land Use Code changes to address regulatory barriers to make it easier for property owners to permit and build ADUs.

## PROPOSED ALTERNATIVES

This EIS analyzes three alternatives. Under Alternative 1 (No Action), no changes would be made to the existing ADU regulations. Alternatives 2 and 3 and the Preferred Alternative consider several Land Use Code changes to meet the objectives of the proposal. Exhibit 2-2 outlines the current regulations under Alternative 1 (No Action) and the proposed changes under Alternatives 2 and 3 each action alternative. We then describe the individual regulations and how they would apply under each alternative.

**Exhibit 2-2** Existing and Proposed Land Use Code Regulations for ADUs

	<b>Alternative 1 (No Action)</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b><u>Preferred Alternative</u></b>
<b>Number of ADUs allowed on lots in single-family zones</b>	Lots in single-family zones can have one AADU or one DADU, but not both.	Lots in single-family zones can have an AADU and a DADU.	Lots in single-family zones can have an AADU and a DADU or two AADUs.	<u>Lots in single-family zones can have an AADU and a DADU or two AADUs. A second ADU can be added if a lot has been in the same ownership for at least one year.</u>
<b>Off-street parking requirements</b>	One off-street parking space is required for an AADU or a DADU unless the lot is in an urban village.	No off-street parking required.	No off-street parking required for lots with one ADU. One off-street parking space is required for lots adding a second ADU.	<u>No off-street parking required.</u>
<b>Owner-occupancy requirements</b>	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.	No change from Alternative 1 (No Action).	<u>No requirement for an owner to occupy the house, AADU, or DADU.</u>  <u>A minimum of one year of continuous ownership is required to establish a second ADU on a lot that already has an ADU.</u>
<b>Minimum lot size for a DADU</b>	4,000 square feet	3,200 square feet	<u>3,200 square feet</u>	<u>3,200 square feet</u>
<b>Minimum lot size to create a new single-family lot</b>	No change from current regulations. <u>SF 5000</u> 5,000 sq. ft. <u>SF 7200</u> 7,200 sq. ft. <u>SF 9600</u> 9,600 sq. ft.			

	Alternative 1 (No Action)	Alternative 2	Alternative 3	Preferred Alternative
<b>Maximum gross floor area</b>	<p><b>AADU</b> 1,000 square feet, including garage and storage areas.</p> <p><b>DADU</b> 800 square feet, including garage and storage areas.</p>	<p><b>AADU</b> 1,000 square feet, excluding garage and storage areas.</p> <p><b>DADU</b> 1,000 square feet, excluding garage and storage areas.</p> <p>An AADU or a DADU may exceed 1,000 square feet if the portion of the structure in which the ADU is located existed on December 31, 2017, and if the entire ADU is located on one level.</p>	<p><b>AADU</b> 1,000 square feet, including garage and storage areas.</p> <p><b>DADU</b> 1,000 square feet, including garage and storage areas.</p> <p>An AADU may exceed 1,000 square feet if the portion of the structure in which the AADU is located existed on December 31, 2017, and if the entire AADU is located on one level.</p>	<p><u><b>AADU</b> 1,000 square feet, excluding garage and storage areas.</u></p> <p><u><b>DADU</b> 1,000 square feet, excluding garage and storage areas.</u></p> <p><u>An AADU may exceed 1,000 square feet if the portion of the structure in which the AADU is located existed on December 31, 2017, and if the entire AADU is located on one level.</u></p>
<b>Maximum height</b>	No change from existing height limits, which vary by lot width and range from 15 to 23 feet.	<p>Height limits are 1 to 3 feet higher than existing limits, depending on lot width.</p> <p>Allow 1 to 2 additional feet for a DADU that meets green roof standards.</p>	Height limits are 1 to 3 feet higher than existing limits, depending on lot width.	<p><u>Height limits are 1 to 3 feet higher than existing limits, depending on lot width.</u></p> <p><u>Allow 1 to 2 additional feet for a DADU that incorporates green building strategies.</u></p>
<b>Lot coverage</b>	<p>No change from current regulations.</p> <p><b>Lots greater than 5,000 square feet</b> 35 percent of lot area.</p> <p><b>Lots less than 5,000 square feet</b> 15 percent of lot area plus 1,000 square feet.</p>			
<b>Rear yard coverage</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 <u>total height of the DADU is 15 feet or less in height</u> . Rear yard coverage for structures other than a DADU cannot exceed 40 percent.		<u>60 percent for a DADU whose total height is no more than 15 feet, subject to limitations on tree removal. Rear yard coverage for structures other than a DADU cannot exceed 40 percent.</u>
<b>Roof features</b>	No exceptions for roof features on accessory structures are allowed.	Height limit exceptions are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.		

	Alternative 1 (No Action)	Alternative 2	Alternative 3	Preferred Alternative
<b>Location of DADU entry</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 if they are 10 feet from the lot line and if located on the façades facing the nearest side or rear lot line (unless abutting right-of-way).		
<b>Maximum household size</b>	Any number of related people, or up to eight unrelated people, can live on lots in single-family zones including in an AADU or a DADU.	Any number of related people, or up to eight unrelated people, can live on lots in single-family zones with an AADU or a DADU. If the lot has an AADU and a DADU, the limit is 12.	No change from Alternative 1 (No Action).	<u>Any number of related people, or up to eight unrelated people, can live on lots in single-family zones with an AADU or a DADU. If the lot has an AADU and a DADU, the limit is 12.</u>
<b>MHA requirements Incentives for affordable housing<sup>1</sup></b>	Mandatory Housing Affordability (MHA) <del>does not</del> <u>No incentives for affordable housing</u> apply to creation of ADUs on lots in single-family zones.	No change from Alternative 1 (No Action).	<p>MHA requirements <u>Incentives for affordable housing</u> apply when a property owner applies for a permit to construct a second ADU on a lot that already has one ADU.</p> <p>For development of a second ADU, the MHA requirements for zones with an (M) suffix would apply, as outlined in Section 23.58C of the Land Use Code. For purposes of analysis, <u>this equates to we consider an affordability contribution equal to the Mandatory Housing Affordability (MHA) requirements for zones with an (M) suffix in medium areas, as outlined in Section 23.58C of the Land Use Code. This equates to an affordability contribution of \$13 per square foot of gross floor area in the second ADU.</u></p>	<u>No incentives for affordable housing apply to the creation of a second ADU. Independent from the Land Use Code changes evaluated in this EIS, the City is considering programmatic actions or investments to make ADUs available to homeowners and renters with lower incomes.</u>

	Alternative 1 (No Action)	Alternative 2	Alternative 3	Preferred Alternative
<b>Predevelopment Reduced development costs<sup>2</sup></b>	No change.	Reduces predevelopment costs by 10 percent. This could result from reducing permitting costs by streamlining project review, reducing permitting and design costs by providing pre-approved plans, or other actions.	No change from Alternative 1 (No Action).	
Reduced predevelopment and construction costs resulting from various possible City actions.				
<b>Maximum floor area ratio (FAR) limit</b>	No FAR limit for single-family zones. The maximum size for the main house is effectively set by the yard requirements, height limit, and lot coverage limit.  ADUs are subject to the maximum size limits described above.	No change from Alternative 1 (No Action).	<b>New construction</b> FAR limits apply to development in single-family zones. New houses (i.e., principal structures) are subject to a FAR limit of 0.5 or 2,500 square feet, whichever is greater. Below-grade floor area and floor area in DADUs is exempt. ADU size limits apply.  <b>Existing houses</b> Existing lots in single-family zones exceeding the FAR or 2,500-square-foot limits can convert existing space to an AADU and add a DADU subject to the size limit above.	<b>New construction</b> FAR limits apply to development in single-family zones. New houses (i.e., principal structures) are subject to an FAR limit of 0.5 or 2,500 square feet, whichever is greater.  <u>Below-grade floor area and floor area in an ADU is exempt.</u>  <b>Existing houses</b> <u>Existing lots in single-family zones exceeding the FAR or 2,500-square-foot limits can convert existing space to an AADU and add a DADU subject to the size limit above.</u>

1 See page 2-16 for information about why we have modified the terminology.

2 See page 2-19 for information about why we apply these cost assumptions across all alternatives.

## EXISTING AND PROPOSED ADU REGULATIONS

### Number of ADUs on Lots in Single-Family Zones

**Alternative 1 (No Action).** Under current regulations, lots in single-family zones can have one AADU or one DADU, but not both.

**Alternative 2.** The proposed code changes would allow lots in single-family zones to have both an AADU and a DADU. On its own, this change maintains the maximum building envelope currently allowed in single-family zones and modifies only the number of units allowed within that envelope. The maximum lot coverage limit would continue to regulate the footprint of structures on these lots, and other development standards would apply as described further below.

**Alternative 3.** The proposed code changes would allow lots in single-family zones to have both an AADU and a DADU or two AADUs. Like Alternative 2, this does not change the building envelope allowed currently on lots in single-family zones.

**Preferred Alternative.** Like Alternative 3, the proposed code changes would allow lots in single-family zones to have both an AADU and a DADU or two AADUs. A second ADU is allowed only on a lot that has been in continuous ownership of at least one property owner for a minimum of one year.

### Off-Street Parking Requirements

**Alternative 1 (No Action).** Current regulations require property owners to provide an off-street parking space when establishing an accessory dwelling unit. This requirement can be waived only if the topography of or location of existing structures on the lot make providing the parking space infeasible. This requirement is in addition to the off-street parking space required for main houses on lots in single-family zones.

**Alternative 2.** The proposed Land Use Code changes under Alternative 2 would remove the off-street parking requirement for lots with one or two ADUs. This would not alter the existing provision that prohibits removal of an existing required parking space for the main house unless replaced elsewhere on the lot.

**Alternative 3.** Under Alternative 3, the proposed changes would remove the parking requirement for lots with one ADU but require parking when

a second ADU is established on the same lot, in addition to the parking space required for the main house.

**Preferred Alternative.** Like Alternative 2, the Preferred Alternative would remove the off-street parking requirement for lots with ADUs. This would not alter the existing provision that prohibits removal of an existing required parking space for the main house unless replaced elsewhere on the lot.

### Owner-Occupancy Requirement

**Alternative 1 (No Action).** Current regulations require that a property owner occupy either the main house or the ADU for six months of the year.

**Alternative 2.** Alternative 2 would remove the owner-occupancy requirement. Property owners would not be required to occupy the main house, AADU, or DADU. This would allow property owners who no longer want or are able to live on their property to move and rent their house, AADU, and DADU. It would also allow property owners who currently rent out their house to create an AADU and/or a DADU on their lot.

**Alternative 3.** Under Alternative 3, the current requirement that a property owner occupy either the main house or ADU for six months of the year would remain.

**Preferred Alternative.** Like Alternative 2, the Preferred Alternative would remove the owner-occupancy requirement. A second ADU would be allowed only if the lot has been in continuous ownership for a minimum of one year.

### Minimum Lot Size for a DADU

**Alternative 1 (No Action).** Under current regulations, DADUs can be constructed only on lots 4,000 square feet and larger. Converting an existing accessory structure into a DADU is allowed on lots smaller than 4,000 square feet.

**Alternatives 2, Alternative and 3, and the Preferred Alternative.** The proposed code changes under ~~Alternatives 2 and 3~~ all action alternatives would reduce the minimum lot size for a DADU to 3,200 square feet. Approximately 7,300 lots in single-family zones that currently do not have but otherwise meet the criteria for a DADU would become eligible for one due to this change.

### Minimum Lot Size to Create a New Single-Family Lot

**All Alternatives.** Single-family zoning requires a minimum size to create a new lot. The minimum varies in each of Seattle’s three single-family zones as shown in Exhibit 2-3:

**Exhibit 2-3**  
Minimum Area for  
New Lots in Single-  
Family Zones

Zone	Abbreviated	Minimum lot size
<b>Residential, Single-family 5,000</b>	SF 5000	5,000 square feet
<b>Residential, Single-family 7,200</b>	SF 7200	7,200 square feet
<b>Residential, Single-family 9,600</b>	SF 9600	9,600 square feet

Existing regulations provide various exceptions that allow for lots smaller than indicated above in specific circumstances.

No change is proposed to this minimum lot size in any alternative. The proposed reduction described above in the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet would affect only whether a lot in this size range can have a DADU. It would not alter the minimum size for subdividing land to create new lots.

### Maximum Gross Floor Area

**Alternative 1 (No Action).** Under current regulations, AADUs are limited to 1,000 square feet, including garage and storage space. An AADU located entirely on one level can exceed the 1,000-square-foot limit if the structure in which it is located existed on June 1, 1999. DADUs are limited to 800 square feet, including garage and storage space.

**Alternative 2.** Under Alternative 2, the maximum size limit would increase to 1,000 square feet for DADUs, and garage and storage space would no longer count toward the allowance for AADUs or DADUs. An AADU or a DADU may exceed the 1,000-square-foot limit if the portion of the structure in which the ADU is located existed on December 31, 2017, and if the entire ADU is located on one level.

**Alternative 3.** Under Alternative 3, the maximum size limit would be 1,000 square feet for both AADUs and DADUs, but garage and storage space would continue to count toward the allowance. An AADU may exceed the 1,000-square-foot limit if the portion of the structure in which the AADU is located existed on December 31, 2017, and if the entire AADU is located on one level.

**Preferred Alternative.** Like Alternative 2, the maximum size limit for both AADUs and DADUs under the Preferred Alternative would be 1,000 square feet, and garage and storage area would not count towards this limit. Like Alternative 3, the Preferred Alternative would allow an AADU to exceed the 1,000-square-foot limit if the portion of the structure in which the AADU is located existed on December 31, 2017, and if the entire AADU is located on one level.

## Maximum Height

**Alternative 1 (No Action).** Currently, the maximum height of a DADU depends on the width of the lot and ranges from 12 to 23 feet (Exhibit 2-4).

	Lot width				
	Less than 30 feet	30 to 35 feet	36 to 40 feet	41 to 50 feet	Greater than 50 feet
<b>Maximum height limit (feet)</b>	12	14	15	16	16
<b>Additional height for a pitched roof (feet)</b>	3	7	7	6	7
<b>Additional height for a shed or butterfly roof (feet)</b>	3	4	4	4	4

**Exhibit 2-4**  
Current Height  
Limits for DADUs

**Alternative 2.** As shown in Exhibit 2-5, Alternative 2 would create three lot width categories to calculate the height limit for a DADU: less than 30 feet, between 30 and 50 feet, and greater than 50 feet in width. The proposed changes would add, at most, three feet to the current height limits. On the narrowest lots, a DADU with a pitched roof could be up to 17 feet tall. On the widest lots — those more than 50 feet wide — a DADU with a pitched roof could be up to 25 feet tall. No change is proposed to the maximum height limit for principal dwellings in single-family zones, which is 30 feet plus five additional feet for a pitched roof.

The proposed Land Use Code changes would also allow two additional feet in height for all lots and roof types if the proposed roof meets the green roof standards that currently apply for main houses in single-family zones, outlined in [Section 23.44.012.C.2](#). This additional height would be allowed to accommodate the structural requirements, roofing membranes, and soils required for a green roof.

**Exhibit 2-5**

Proposed Height Limits for DADUs under Alternatives 2, Alternative 3, and the Preferred Alternative

	Lot width		
	Less than 30 feet	30 to 50 feet	Greater than 50 feet
<b>Maximum height limit (feet)</b>	14	16	18
<b>Additional height for a pitched roof (feet)</b>	3	7	7
<b>Additional height for a shed or butterfly roof (feet)</b>	3	4	4

Under Alternative 2, up to two additional feet would be allowed for a DADU that meets green roof standards. Under the Preferred Alternative, up to two additional feet would be allowed for a DADU achieving various green building strategies.

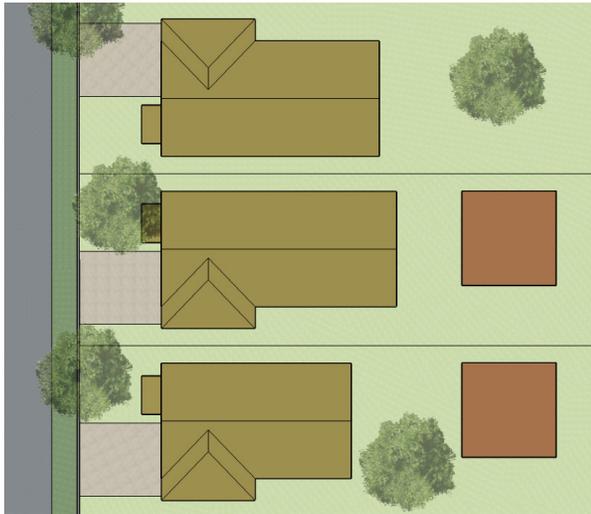
**Alternative 3.** Under Alternative 3, the proposed height limit changes would be the same as described for Alternative 2, but additional height for a green roof would not be included.

**Preferred Alternative.** Under the Preferred Alternative, the proposed height limit changes would be the same as described for Alternative 2, with additional height allowed for various green building strategies, including green roofs, solar photovoltaic arrays, and achievement of a green building standard as defined in Director’s Rule 20-2017, such as Passive House Institute. This additional height would be allowed to accommodate the design and structural requirements for features like a green roof, solar panels, or superior insulation.

**Lot Coverage**

**All Alternatives.** Current regulations for lot coverage limits would not change. As illustrated in Exhibit 2-6, this existing standard limits the amount of a lot that all structures can cover:

- Lots less than 5,000 square feet: 1,000 square feet plus 15 percent of lot area
- Lots larger than 5,000 square feet: 35 percent of lot area



Footprint of House	1,250 sq. ft.
Footprint of DADU	n/a
<b>Total lot coverage</b>	<b>1,250 sq. ft. / 25%</b>

Footprint of House	1,350 sq. ft.
Footprint of DADU	400 sq. ft.
<b>Total lot coverage</b>	<b>1,750 sq. ft. / 35%</b>

Footprint of House	1,000 sq. ft.
Footprint of DADU	500 sq. ft.
<b>Total lot coverage</b>	<b>1,500 sq. ft. / 30%</b>

**Exhibit 2-6**  
Illustration of Lot Coverage on a 5,000-Square-Foot Lot

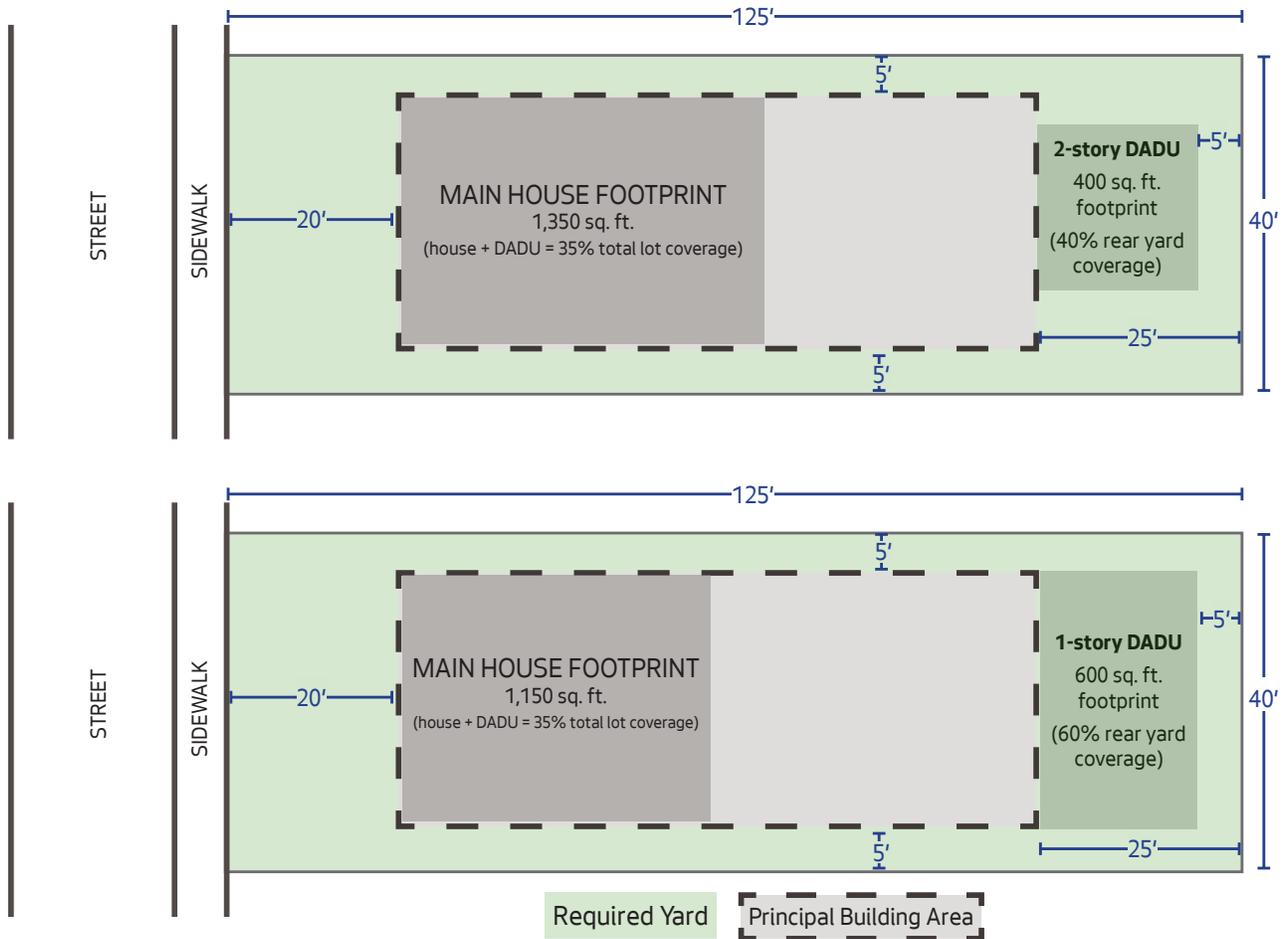
### Rear Yard Coverage

**Alternative 1 (No Action).** Current regulations allow up to 40 percent of a rear yard to be covered by a DADU and other accessory structures (like a garage). The rear yard is the area between the side lot lines extending from the rear lot line a distance of 25 feet or 20 percent of the lot depth. When the rear yard abuts an alley, the rear yard is calculated from the alley centerline.

**Alternatives 2 and 3.** As illustrated in Exhibit 2-7, the proposed code changes would allow a DADU with a total height of up to 15 feet to cover ~~20 percent more~~ 60 percent of the rear yard, as long as rear yard coverage for all structures other than the DADU does not exceed 40 percent. This change would allow flexibility for the design of a DADU without stairs to accommodate occupants with limited mobility or disability. The rear yard coverage limit for DADUs taller than 15 feet would not change.

**Preferred Alternative.** The rear yard coverage limit would be the same as Alternatives 2 and 3, except that limits on tree removal would apply for development resulting in rear yard coverage above 40 percent.

**Exhibit 2-7** Illustration of Required Yards and Rear Yard Coverage



### Location of DADU Entry

**Alternative 1 (No Action).** Current regulations state that a DADU entrance cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.

**Alternatives 2, Alternative and 3, and the Preferred Alternative.** The proposed code changes would allow an entrance on any façade provided that the entrance is no closer than 10 feet to side or rear lot line, unless that lot line abuts a public right-of-way.

## Roof Features

**Alternative 1 (No Action).** Current regulations do not allow DADUs to have roof features like dormers, clerestories, and skylights that accommodate windows and add interior space (Exhibit 2-8).

**Alternatives 2, Alternative and 3, and the Preferred Alternative.** The proposed code changes would allow these roof features subject to the provisions applicable to single-family houses. None of these features can project above the ridge of a pitched roof. Similar provisions to what exist in the regulations for main houses in the standards for lots in single-family zones would limit the size and location of such roof features on DADUs. Features that project from a roof would be limited to 30 percent of the roof area, for example, and be subject to width and separation requirements.



**Exhibit 2-8**  
Illustration of Roof  
Features

**Alternative 1**

Dormers and other roof  
features prohibited

**Alternatives 2, Alternative and 3,  
and the Preferred Alternative**

Dormers and other roof features  
allowed on a DADU

### Mandatory Housing Affordability

MHA requires multifamily and commercial development to support affordable housing. The City has implemented or is in the process of implementing MHA in certain zones using three levels of affordable housing requirements identified by an (M), (M1), or (M2) suffix added to the zone name. These levels correspond to the scale of zoning changes and the corresponding affordability contribution required.

In the Draft EIS, Alternative 3 contemplates applying included what we described as MHA requirements for zones with an (M) suffix when a property owner establishes a second ADU on a lot in a single-family zone. As established in Sections 23.58B and 23.58C of the Land Use Code, MHA per se applies to all development, whether or not a property owner uses additional development capacity. Therefore, a more accurate description is that Alternative 3 considers an incentive that would allow an owner to construct a second ADU by making a contribution to affordable housing.

### Maximum Household Size

**Alternative 1 (No Action).** Current regulations allow any number of related people or up to eight unrelated people to live on a lot in a single-family zone, including occupants of an AADU or a DADU.

**Alternative 2.** Alternative 2 would allow any number of related people or up to eight unrelated people to live on a lot in a single-family zone, including those living in an AADU or a DADU. However, up to 12 unrelated people could live on a lot that has both an AADU and a DADU.

**Alternative 3.** Under Alternative 3, the current household size limit would remain in place.

**Preferred Alternative.** Like Alternative 2, the Preferred Alternative would allow any number of related people or up to eight unrelated people to live on a single-family, with up to 12 unrelated people allowed on a lot with two ADUs.

### Mandatory Housing Affordability Requirements Incentives for Affordable Housing

**Alternative 1 (No Action).** MHA requirements do not No incentives for affordable housing apply to the creation of ADUs in single-family zones.

**Alternative 2.** Like Alternative 1 (No Action), MHA requirements incentives for affordable housing would not apply to the creation of ADUs in single-family zones.

**Alternative 3.** Under Alternative 3, MHA requirements incentives for affordable housing would apply. In exchange for contributing to affordable housing, when a property owner applies for a permit to could construct a second ADU on a lot that already has one ADU. In this case, the MHA requirements for zones with an (M) suffix would apply, as outlined in Section 23.58C of the Land Use Code. Section 23.58C also establishes that MHA requirements vary geographically according to whether a development project is in a low, medium, or high area. As shown in Exhibit 2-9, the study area includes land in the low and medium areas. For purposes of analysis, Alternative 3 contemplates an affordability contribution of \$13 per square foot of gross floor area in the second ADU, a requirement equivalent to a zone with an (M) suffix in a medium area, as outlined in Section 23.58C of the Land Use Code. While some locations in the study area are in low areas and therefore would have lower required affordability contributions, applying a per-square-foot

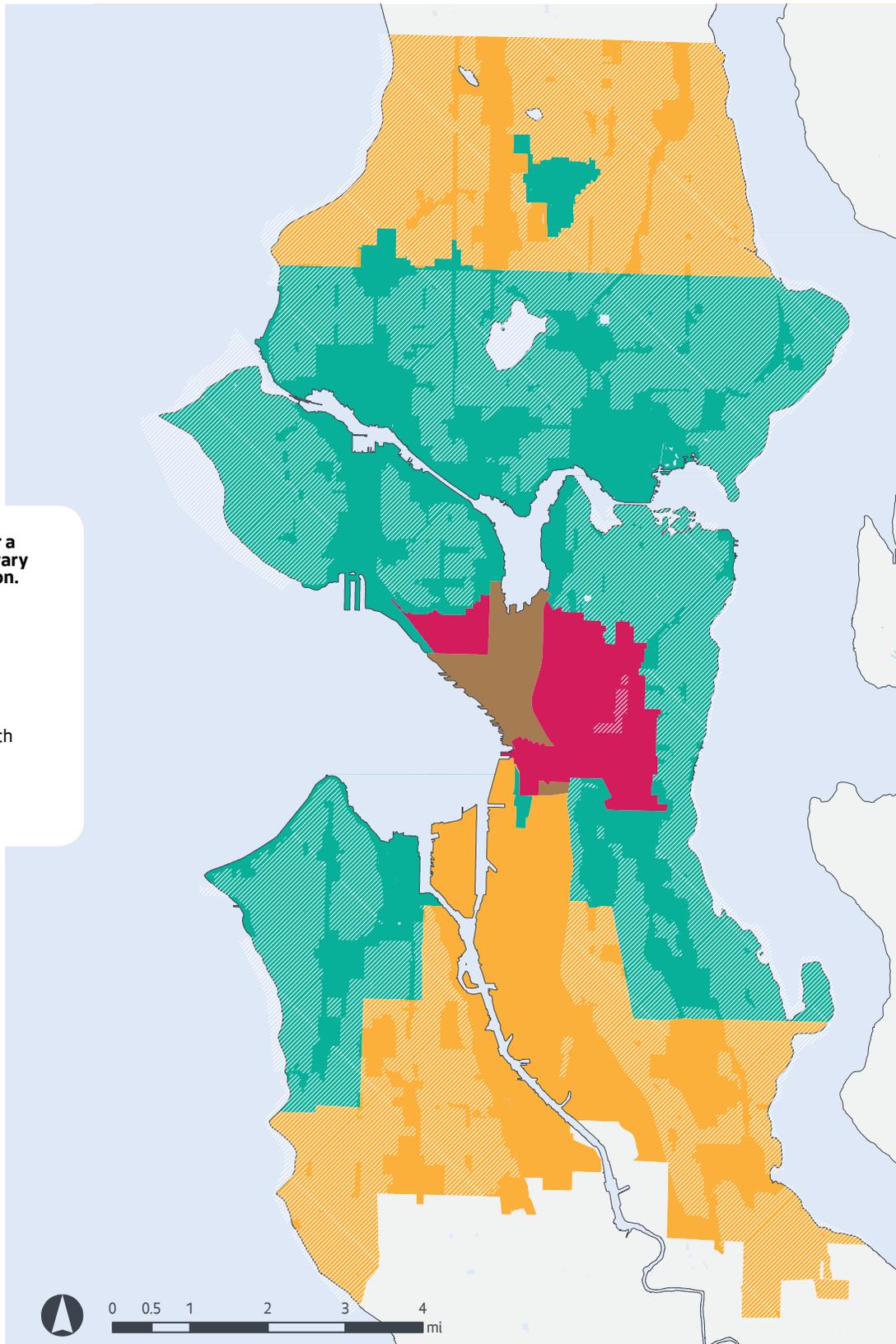
payment of \$13 provides adequate analysis of the MHA requirement for ADU development in the study area.

**Preferred Alternative.** Incentives for affordable housing would not apply to creation of ADUs. Independent of the proposed Land Use Code changes, the City is considering several programmatic actions and investments to make ADUs available to homeowners and renters with lower incomes. See Section 3.2 for more discussion of the City's programmatic work related to ADUs.

Exhibit 2-9 MHA Areas

**MHA requirements for a development project vary according to its location.**

-  Low areas
-  Medium areas
-  High areas
-  Downtown / South Lake Union
-  EIS study area



## **Predevelopment Reduced Development Costs**

**Alternative 1 (No Action).** Under current regulations, the cost of obtaining permits, surveys, and utility hook ups would not change.

**Alternative 2.** Alternative 2 considers a scenario wherein the City provides incentives to reduce predevelopment costs by 10 percent. This could include reducing permitting costs by streamlining the review process and/or providing pre-approved plans that would reduce permitting time and costs and would save money on developing the design.

**Alternative 3.** Alternative 3 analyzes predevelopment costs similar to current conditions, as evaluated under Alternative 1 (No Action).

**All Alternatives.** Under all alternatives, we consider reduced predevelopment and construction costs resulting from various possible City actions and changing market conditions (i.e., ongoing private-sector innovation in design, construction, and ownership of ADUs, which could result in new, lower-cost models of ADU delivery in the future). Because cost is an input in the analysis of residual land value and future ADU production, we include these assumed cost reductions in the analysis to develop as accurate an estimate of future ADU production as possible. The purpose of the EIS is to identify likely impacts of the proposal itself using our best estimate of future conditions. Because efforts to reduce ADU costs are independent of the Land Use Code changes evaluated in this EIS, we factor them in all alternatives. The City anticipates these actions would proceed with or without the proposed Land Use Code changes.

Independent of the Land Use Code changes evaluated in this EIS, the City is currently pursuing pre-approved DADU plans that would reduce permitting time and cost for homeowners. Therefore, all alternatives assume a reduction in architecture and engineering fees and in City permit fees. The City is also exploring opportunities for cheaper designs, construction methods, or materials. To account for possible future reductions in construction cost, whether initiated by the City or other parties, all alternatives contemplate a reduction in hard costs for DADUs.

See Section 3.2 for more discussion of the City's programmatic work related to ADUs. For detail on the specific cost reductions contemplated in all alternatives, see Exhibit A-17 in Appendix A.

**Floor Area Ratio**

Floor area ratio (FAR) is the ratio of a building's total square footage (floor area) to the size of the piece of land on which it is constructed. For example, if a building is subject to an FAR limit of 0.5, then the total square footage of the constructed building must be no more than half the area of the parcel itself. In other words, if the lot is 5,000 square feet, then the square footage of the building cannot exceed 2,500 square feet. Exhibit 2-10 presents examples of FAR limits.

**Maximum Floor Area Ratio Limit**

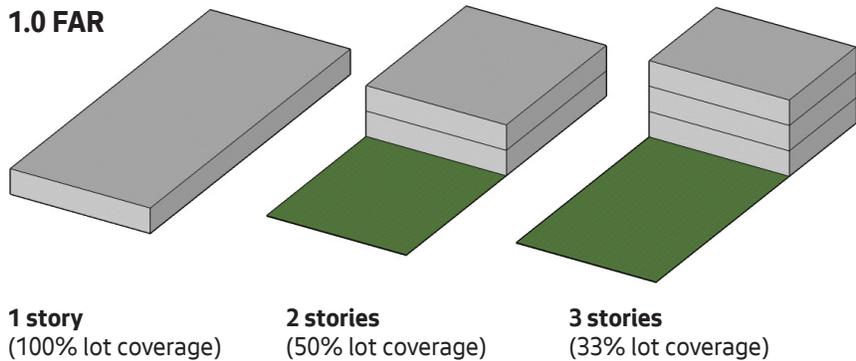
**Alternative 1 (No Action).** Under current regulations, no maximum floor area ratio (FAR) limit applies to development in single-family zones. The maximum size of a principal structure (i.e., the main house) is effectively set by the yard requirements, height limit, and lot coverage limit.

**Alternative 2.** Like Alternative 1 (No Action), no FAR limit would apply in Alternative 2.

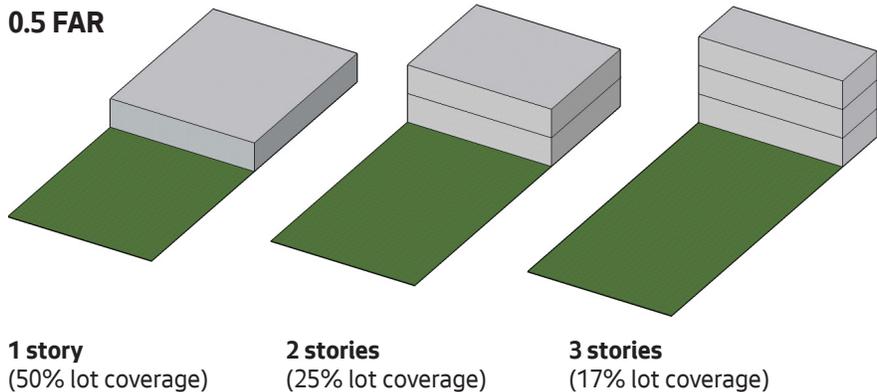
**Alternative 3.** The proposed code changes under Alternative 3 include a maximum FAR limit for development in single-family zones. Lots in single-family zones would be subject to a maximum floor area limit of 0.5 FAR or 2,500 square feet, whichever is greater. Below-grade floor area (e.g., basements) and floor area in a DADU would be exempt from the floor area calculations.

**Exhibit 2-10** Illustrations of FAR Limits

**1.0 FAR**



**0.5 FAR**



On some lots, existing development exceeds these limits; see Exhibit Exhibit 4.3-48 and Exhibit 4.3-49 in Section 4.3. On a lot exceeding the floor area limit (0.5 FAR or 2,500 square feet), existing floor area could be converted into an AADU or a DADU, and a DADU could be constructed in a new accessory structure, subject to the previously described size limits for ADUs.

**Preferred Alternative.** Under the Preferred Alternative, a maximum FAR limit would govern the size and scale of development in single-family zones, similar to Alternative 3. Lots in single-family zones would be subject to a maximum floor area limit of 0.5 FAR or 2,500 square feet, whichever is greater. Floor area below grade or in an ADU (whether attached or detached) would be exempt from the floor area calculations.

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## 3 History and Planning Context

Throughout the 20th century, race- and class-based planning and housing policies and practices created disparities in the economic status of households and neighborhoods. These practices have often excluded lower-income households — disproportionately racial and ethnic minorities — from living in higher-cost neighborhoods. Because higher-density housing is generally more affordable than lower-density housing, areas restricted for lower-density housing contribute to, and reinforce, patterns of segregation. Reviewing historic practices that have contributed to racial, ethnic, and class segregation provides context for the subsequent discussion of current population and household characteristics.

This chapter (1) describes historical planning practices and housing policies that underlie race- and class-based housing patterns in the study area; and (2) describes the current planning context and the history of ADU legislation. The first section describes how the historical exclusion of less wealthy, typically non-white populations from single-family zones has informed the objectives for this EIS and summarizes pertinent demographic information that illustrates these patterns. The City of Seattle and Seattle Housing Authority's Joint Assessment of Fair Housing (Seattle 2017a) provides deeper discussion of factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs.

### 3.1 Historical Context

#### HISTORY OF RACIAL SEGREGATION

In the early 1900s, efforts began to control the type and intensity of land use in cities across the U.S. Los Angeles introduced the first citywide regulations on use to separate its expanding residential areas from industrial activities. In 1916, New York City adopted the nation's first citywide zoning code, a set of limits

on coverage and required setbacks aimed primarily at preventing massive buildings from blocking light and air from reaching the streets below. Over the next two decades, cities across the country began regulating the height, area, location, and use of buildings.

In addition to regulating the physical characteristics of buildings and stabilizing land values, many cities used zoning to enforce systems of racial segregation. First Baltimore and then other cities adopted ordinances that explicitly enforced racial segregation by identifying separate living areas for black and white families (Rothstein 2017). This practice persisted until a 1917 Supreme Court decision found a Louisville, Kentucky, racial zoning ordinance unconstitutional.<sup>1</sup>

Following that decision, other race-based public policy interventions substituted for racial zoning.<sup>2</sup> For example, exclusionary zoning regulations prohibiting higher-density housing (like apartment buildings) in areas with primarily low-density, detached single-family homes tend to deepen economic segregation, thus reinforcing racial segregation since people of color have disproportionately lower incomes. These patterns are visible in the study area of this EIS. Despite these effects, zoning ordinances separating higher-density residential uses from single-family residential uses were ruled constitutional in *Euclid v. Ambler*, where the Supreme Court found that the "police power supports also, generally speaking, an ordinance forbidding the erection in designated residential districts, of business houses, retail stores and shops, and other like establishments, **also of apartment houses in detached-house sections** [emphasis added] — since such ordinances, apart from special applications, cannot be declared clearly arbitrary and unreasonable, and without substantial relation to the public health, safety, morals, or general welfare."<sup>3</sup>

Even absent explicit references to race, public housing, slum clearance, private deed restrictions or racial covenants, and redlining practices also perpetuated racial, ethnic, and class segregation. The practice of redlining, or "drawing lines on city maps delineating ideal geographic areas for bank investment and the sale of mortgages," was formalized in the National Housing Act of 1934 (Housing Act), which created the Federal Housing Administration (FHA) as part of the federal programs

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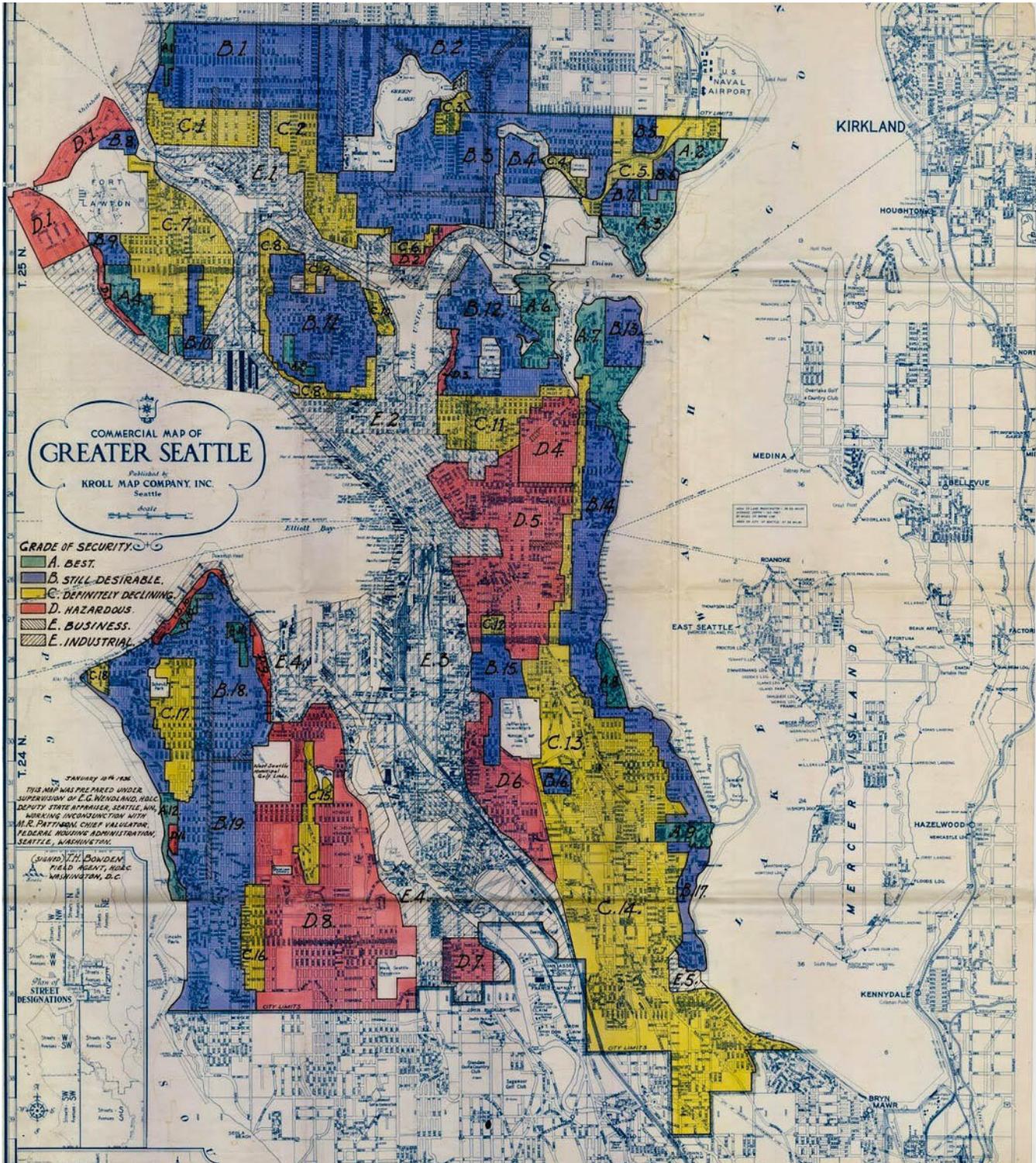
1 *Buchanan v. Warley*; 245 US 60 (1917).

2 In *The Color of Law*, Rothstein reveals the racial motivations of many regulators who devised zoning schemes to circumvent the 1917 *Buchanan* decision.

3 *Euclid v. Ambler*; 272 US 390 (1926).

and regulations known as the New Deal (Silva 2009). Adopted to increase housing stability and expand homeownership by underwriting and insuring home mortgages, the Housing Act endorsed the separation of land uses, including single-family houses and apartments, and facilitated the segregation of people by race and ethnicity through its insurance practices. To determine eligibility for government-backed home mortgages, the FHA conducted its own appraisal to ensure the loan had a low risk of default. As Rothstein writes in *The Color of Law*, "Because the FHA's appraisal standards included a whites-only requirement, racial segregation now became an official requirement of the federal mortgage insurance program" (Rothstein 2017). Through practices of denying mortgages based on race and ethnicity, the federal government played a significant role in the legalization and institutionalization of racism and segregation. Exhibit 3-1 is an example of a Seattle 1936 redlining map with areas deemed "hazardous" for mortgage investments shown in red. For years, these restrictions prevented people of color from buying, improving, and developing property and building wealth.

Exhibit 3-1 1936 City of Seattle Redlining Map

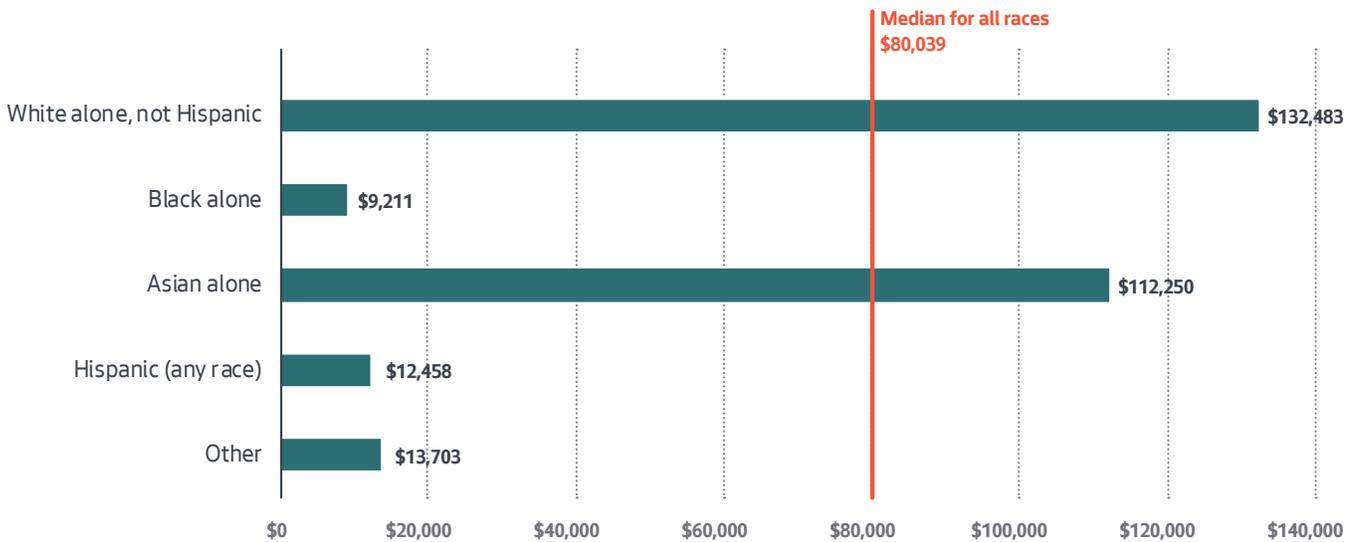


The use of racially restrictive covenants arose in reaction to *Buchanan v. Warley* in 1917, which outlawed municipal racial zoning, and it proliferated when upheld in the 1926 ruling in *Corrigan v. Buckley*. Covenants are legal contracts contained in the deed for a property and enforceable on its future owners. While *Buchanan v. Warley* dealt only with municipal laws, *Corrigan v. Buckley* found that the Fourteenth Amendment barred states from creating race-based zoning ordinances but did not extend to private deeds and developer plat maps. Racially restrictive covenants consequently superseded segregation ordinances as instruments to promote and establish residential racial segregation in U.S. cities.

Unlike many American cities, Seattle never had an explicitly racialized zoning ordinance. But zoning in Seattle nevertheless contributed to racial and ethnic segregation. Indeed, racial deed restrictions were applied to private property in many parts of the EIS study area. Found in neighborhoods across Seattle, these covenants made it difficult or impossible for people of color to find housing outside central neighborhoods (e.g., Central Area, Chinatown), reinforcing patterns of racial segregation that remain today. Efforts to establish and sustain racial covenants continued until ruled unenforceable in the 1948 case of *Shelley v. Kraemer*, though realtors continued the practice of refusing to sell to racial and ethnic minorities. Until the 1960s, racial restrictive covenants kept people of color from moving to residential neighborhoods throughout the city, where they still compose a small share of the population. Further, by limiting access to homeownership, these policies have contributed to the growing wealth disparities by race and ethnicity. Data collected nationally illustrates that householders of color have, on average, substantially less wealth than households with White householders. As shown in Exhibit 3-2, the median net worth in 2013 for households with non-Hispanic White householders was \$132,483, compared to \$9,211 for Black households and \$12,458 for Hispanic (any origin) households (U.S. Census Bureau, 2014). Exhibit 3-3 shows that the share of households with Black householders whose net worth is zero or negative is more than twice that of White householders. Households with Asian householders have the smallest share in this category.

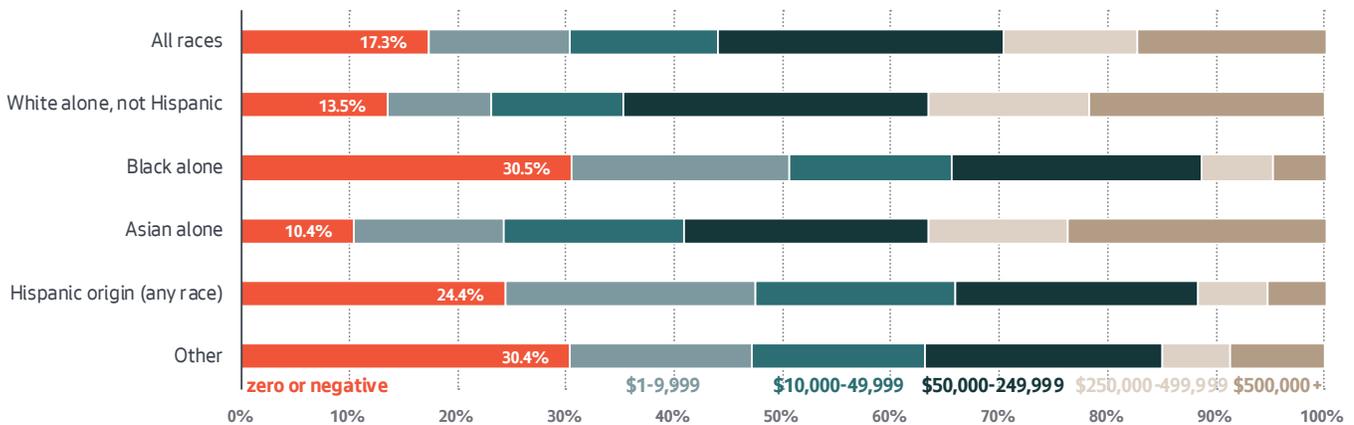
### Exhibit 3-2 National Median Wealth by Race and Ethnicity

Source: U.S. Census Bureau, Survey of Income and Program Participation, 2014 Panel, Wave 1



### Exhibit 3-3 National Wealth Distribution by Race and Ethnicity

Source: U.S. Census Bureau, Survey of Income and Program Participation, 2014 Panel, Wave 1



## HISTORY OF ZONING IN THE EIS STUDY AREA

Before zoning existed in Seattle, the City's building code regulated land use, and dwellings containing up to two families and tenement houses of three or more families were allowed throughout the city (City of Seattle 1909). In 1923, Seattle's first zoning ordinance established several distinct districts according to use, height, and area (Seattle 1923). The ordinance created two districts for residential uses — First Residence District and Second Residence District — distinguished primarily by the number of dwellings allowed on a lot. The First Residence District allowed "Single

Family Dwellings," defined as detached buildings occupied by one family only, plus churches, schools, and parks. Second Residence Districts expanded the allowed uses to include "all dwellings, flats, apartment houses and boarding and lodging houses without stores." Maximum heights were a separate dimension of the zoning ordinance and varied across these use districts. (Business Districts also allowed all the uses of the Residence Districts, plus various commercial activities.) The 1923 zoning ordinance was amended continually over time and then replaced entirely, first in 1957, and then again in the 1980s, when the City Council adopted the Seattle Municipal Code and the general zoning framework still in place today.

This legislative timeline not only traces Seattle's history of separating higher- and lower-density residential uses but also identifies how zoning in the EIS study area has changed over time. Though it comprises only single-family zoning today, the study area includes land first zoned in 1923 as Second Residence District, where multifamily housing was legal. As an example of these areas, Exhibit 3-4 shows a plate from Seattle's 1923 zoning ordinance and Exhibit 3-5 a map of current zoning for the same geography. Blocks with diagonal hatching in Exhibit 3-4 were zoned in 1923 to allow multifamily housing. Several blocks in the study area for this EIS originally allowed multifamily housing and were later downzoned through subsequent legislation to limit residential development to detached single-family dwellings only. Two areas outlined in blue exemplify this pattern. Most of the area between NW 50th Street and NW 65th Street and between 14th Avenue NW and 5th Avenue NW was zoned Second Residence District in 1923, but nearly all this land has more restrictive single-family zoning today. The same is true for the area between N 46th Street and N 50th Street and between Aurora Avenue N and Stone Avenue N. Other examples exist throughout the EIS study area of areas that previously allowed multifamily housing types. In these locations, structures built during this period remain today as markers of prior zoning schemes — but could not legally be constructed under current rules (Exhibit 3-8). See Exhibit 4.2-6 for a map of multifamily uses in single-family zones.

Exhibit 3-4 Plate 3 from 1923 Seattle Zoning Ordinance

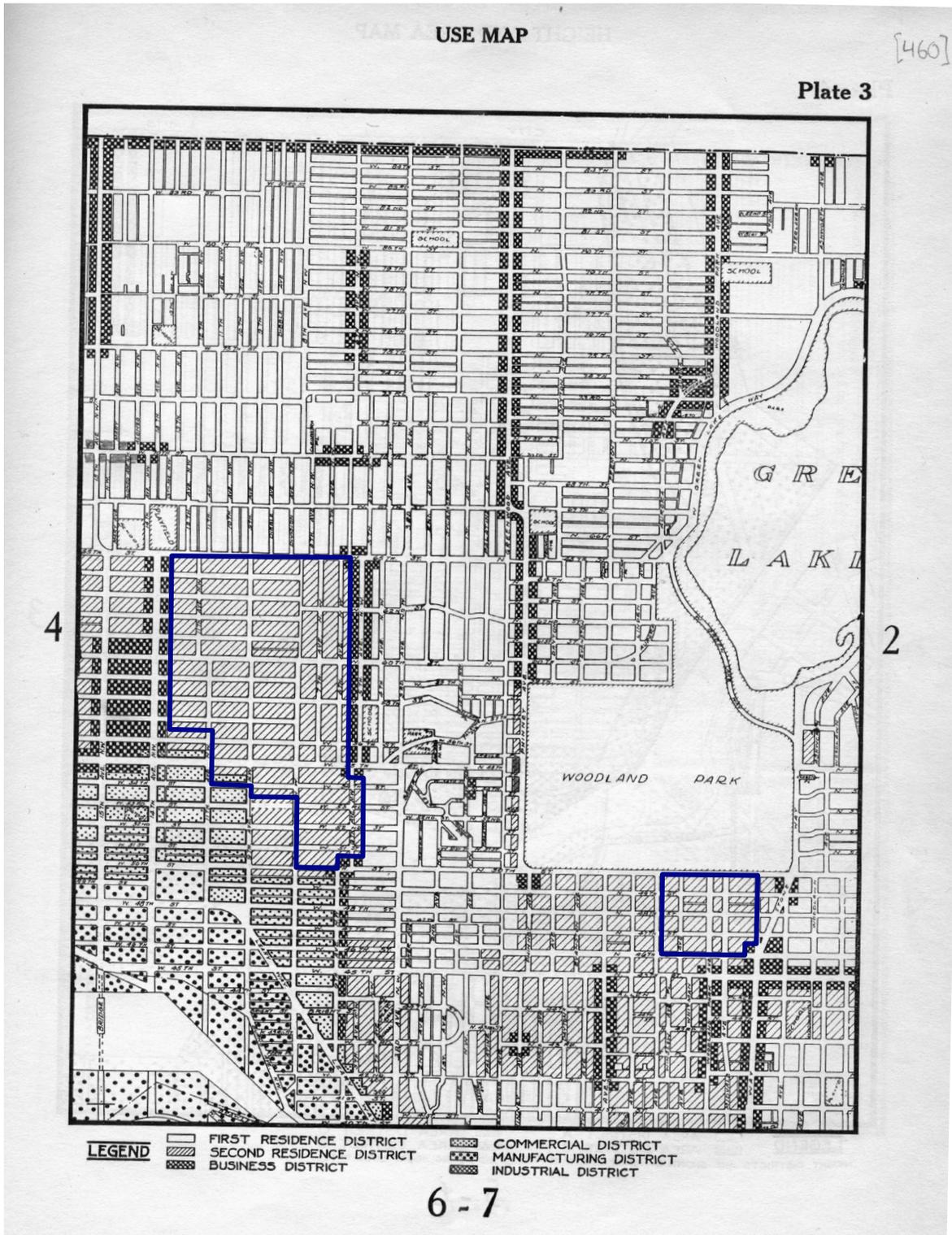
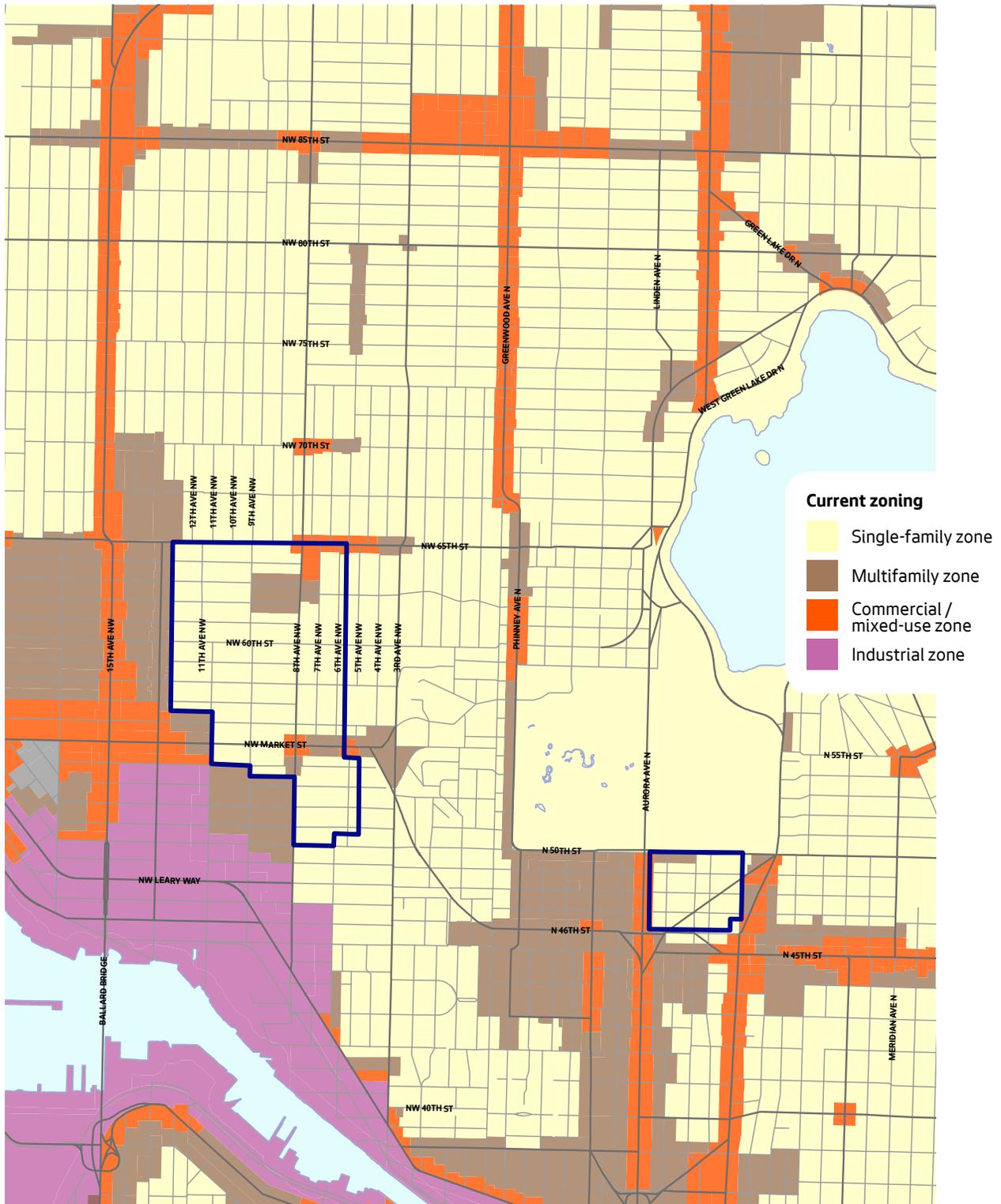


Exhibit 3-5 Current Seattle Zoning Ordinance



By digitizing original zoning plates, we can compare Seattle's 1923 zoning ordinance with current zoning. Approximately 2,567 acres currently located in single-family zones (11 percent of today's single-family land) previously had a designation other than First Residence District, the most restrictive zone in 1923. Six percent of this area was designated Second Residence District, where multifamily residential uses were allowed. Two percent was zoned Business District and Commercial District each; multifamily uses were legal here, too. Exhibit 3-6 summarizes these approximate estimates of changes in area of zoning designations between 1923 and today.

**Exhibit 3-6** Summary of Land Area by 1923 and Current Zoning Designation

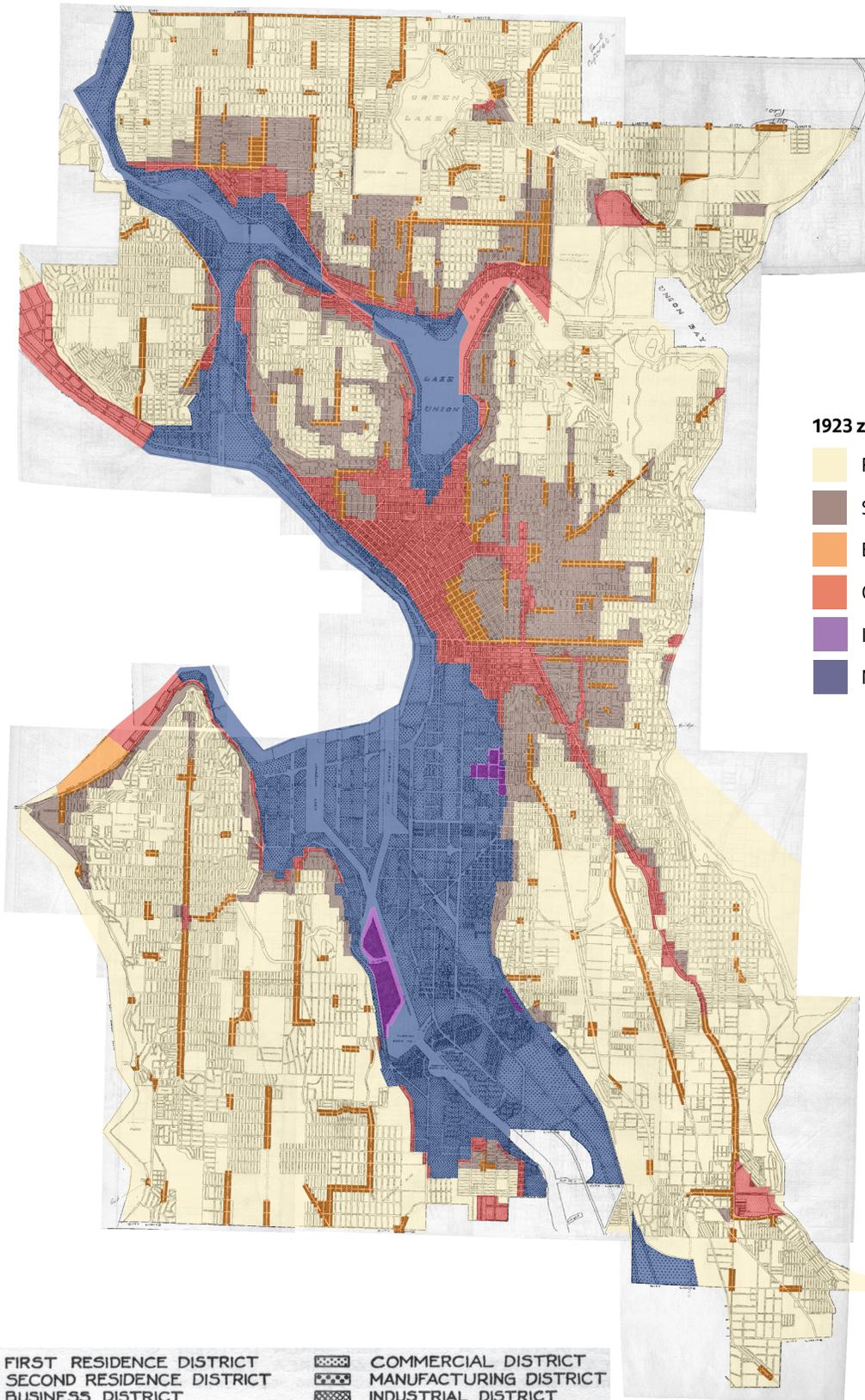
Current Zoning	1923 Zoning Designation					
	First Residence District	Second Residence District	Business District	Commercial District	Manufacturing District	Industrial District
<b>SF 5000</b>	17,891	1,325	392	89	138	0
<b>SF 7200</b>	3,954	105	57	366	22	0
<b>SF 9600</b>	1,230	29	5	6	34	0
<b>Total</b>	<b>23,075</b>	<b>1,459</b>	<b>454</b>	<b>461</b>	<b>193</b>	<b>0</b>

These area figures approximate zoned land in Seattle's 1923 municipal boundary as illustrated in Exhibit 3-7, an area smaller than Seattle's current land area.

**New in the FEIS** Exhibit 3-6 is new in the Final EIS.

Exhibit 3-7 presents a georeferenced version of the 1923 zoning plates. It is overlaid with a digitized version of this zoning using conventional land use colors. While this digitization exercise has a margin of error associated with georeferencing older zoning plates to current locations, it identifies areas where multifamily uses were legal in 1923 and are banned today.

**Exhibit 3-7** Digitized Version of Seattle's 1923 Zoning Ordinance



**New in the FEIS**

Exhibit 3-7 is new in the Final EIS.

**1923 zoning designations**

- First Resident District
- Second Residence District
- Business District
- Commercial District
- Industrial District
- Manufacturing District

<span style="display: inline-block; width: 15px; height: 15px; border: 1px solid black; margin-right: 5px;"></span> FIRST RESIDENCE DISTRICT	<span style="display: inline-block; width: 15px; height: 15px; border: 1px solid black; background-image: linear-gradient(to right, transparent 49%, black 49%, black 51%, transparent 51%); background-size: 4px 4px; margin-right: 5px;"></span> COMMERCIAL DISTRICT
<span style="display: inline-block; width: 15px; height: 15px; border: 1px solid black; background-image: linear-gradient(to right, transparent 49%, black 49%, black 51%, transparent 51%); background-size: 4px 4px; margin-right: 5px;"></span> SECOND RESIDENCE DISTRICT	<span style="display: inline-block; width: 15px; height: 15px; border: 1px solid black; background-image: radial-gradient(circle, black 1px, transparent 1px); background-size: 4px 4px; margin-right: 5px;"></span> MANUFACTURING DISTRICT
<span style="display: inline-block; width: 15px; height: 15px; border: 1px solid black; background-image: radial-gradient(circle, black 1px, transparent 1px); background-size: 4px 4px; margin-right: 5px;"></span> BUSINESS DISTRICT	<span style="display: inline-block; width: 15px; height: 15px; border: 1px solid black; background-image: radial-gradient(circle, black 1px, transparent 1px); background-size: 4px 4px; margin-right: 5px;"></span> INDUSTRIAL DISTRICT

**Exhibit 3-8**  
Example of  
Nonconforming  
Multifamily Housing  
in the Study Area



## POPULATION AND HOUSEHOLD CHARACTERISTICS

Population and household patterns in the study area have changed substantially over time. In April 2017, the Washington State Office of Financial Management (OFM) estimated that Seattle had about 713,700 residents. Since 2010, the population of Seattle is estimated to have grown by some 105,000 people, an increase of about 17 percent (OFM 2017). Seattle has an estimated 304,157 households, with an average household size of 2.12 persons (U.S. Census Bureau 2016).

While the city's total population has grown, in certain areas the population has remained stable or declined. Exhibit 3-6 shows population growth from 2000 to 2010 at the census tract level. Unfortunately, census tracts in Seattle tend not to align well with zoning boundaries, making it difficult to identify specific tracts as inside or outside the study area. But we can examine the characteristics of areas that gained and lost population. Roughly one-third of Seattle's census tracts (45 of 131) had more people in 1970 than in 2010, and nearly all these tracts consist primarily of single-family zoning. In tracts that lost population, 81 percent of land area has single-family zoning, eight percent has industrial zoning, five percent has multifamily zoning, four percent has commercial and mixed-use zoning, and three percent has institutional zoning.

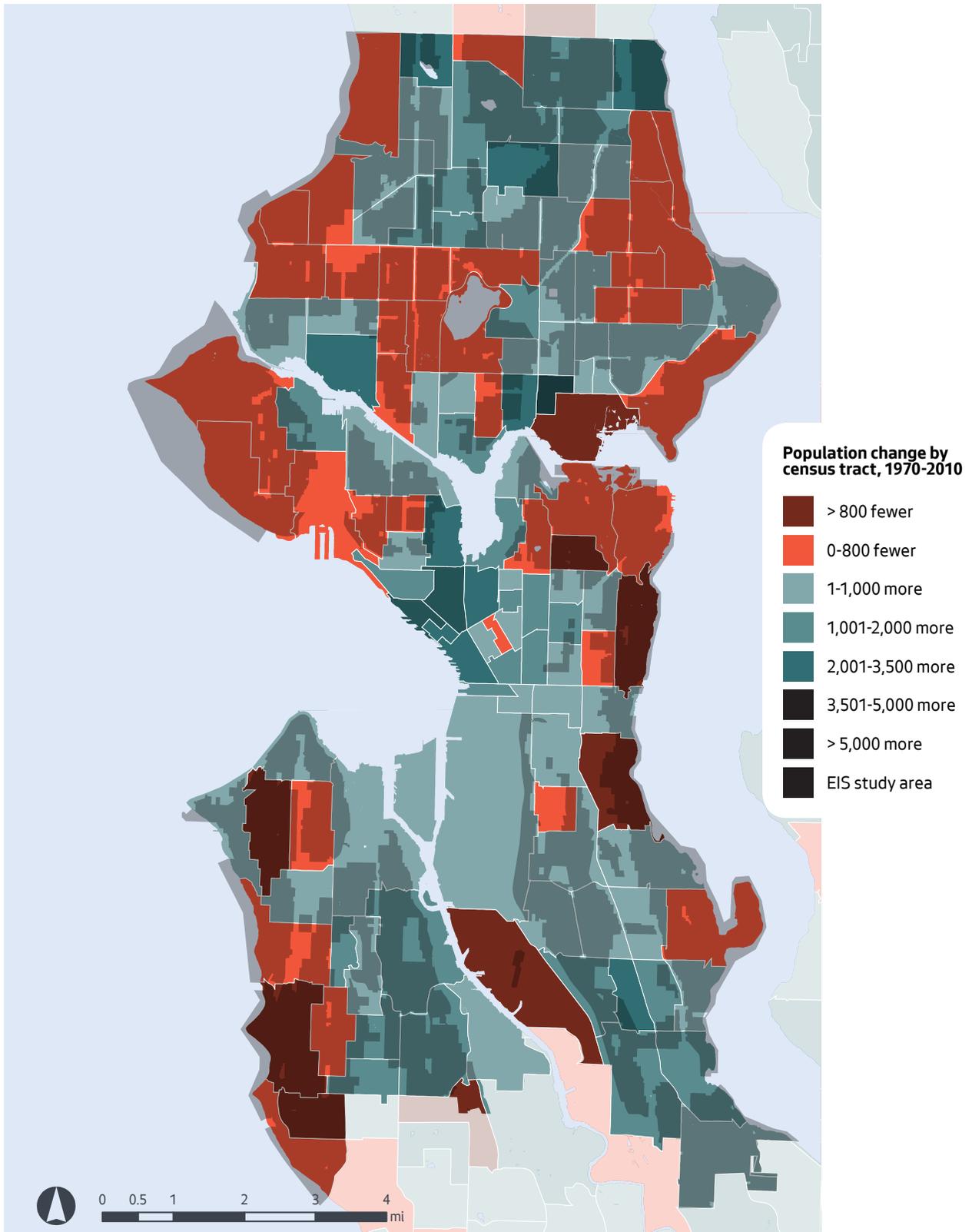
### U.S. Census Terminology

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For reporting purposes, the U.S. Census Bureau divides the country into different geographic areas. At the local level, counties are typically divided into smaller geographic units called Census Tracts. Census Blocks are a smaller subdivision found within Census Tracts.

**Exhibit 3-9** Population Change by Census Tract, 1970-2010

Source: U.S. Census Bureau



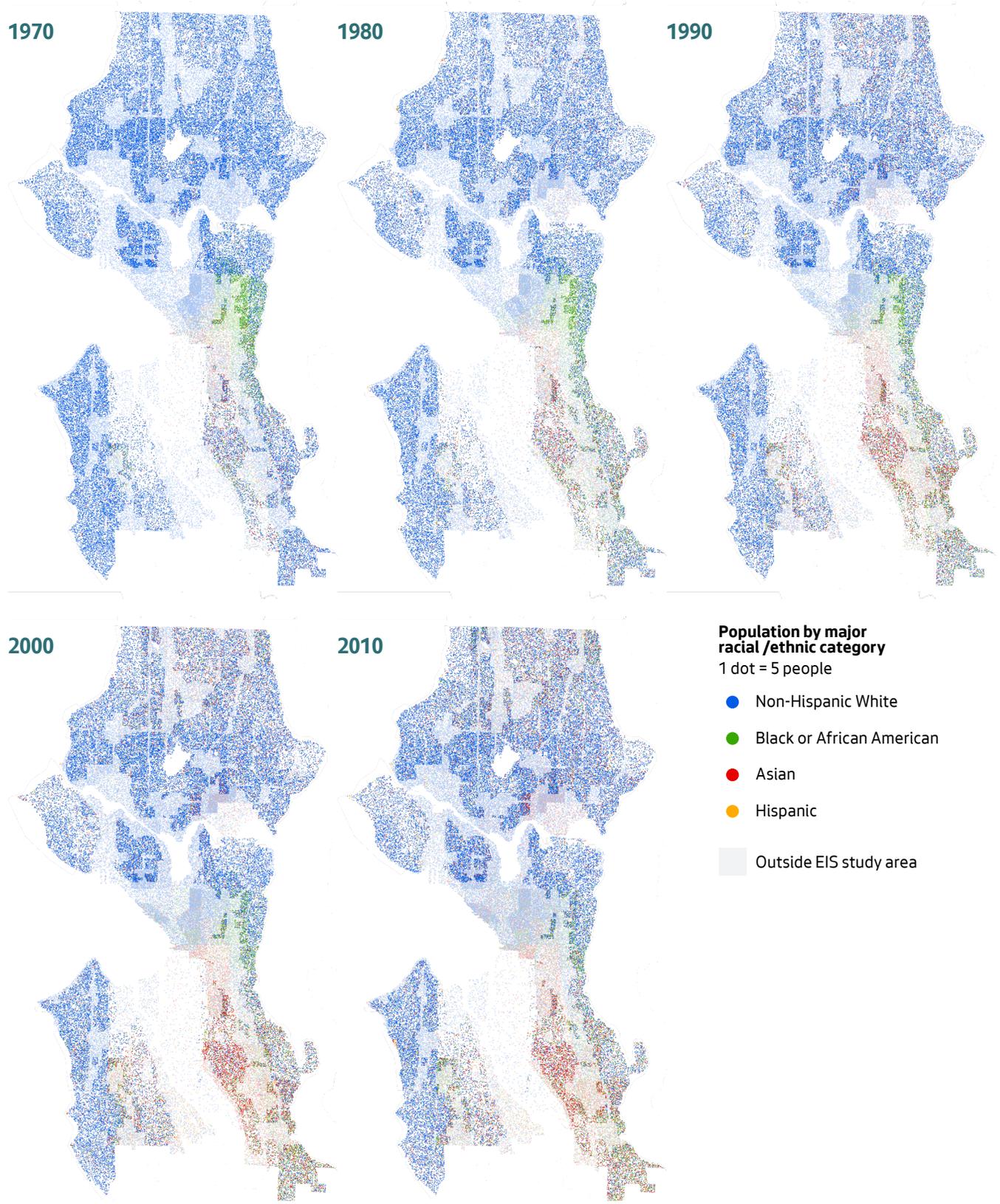
Meanwhile, in census tracts that gained population between 1970 and 2010, single-family zoning comprises 31 percent less land area. Comparing zoning of gross land area in tracts that lost and gained population is not the only way to explore why population growth has historically varied across Seattle, but it indicates that many parts of the EIS study area likely have fewer residents today than decades ago.

We also see this pattern in data at the census block level. Due to their smaller geographic size, census blocks let us examine the study area more closely than with census tracts. Unfortunately, since census block geography has changed with each decennial census, it is not possible to study precise block-by-block population change over time. But we can approximate the study area by examining census blocks completely or substantially within the study area, even if some boundaries have changed over time. Based on this method, the population in the study area increased by about three percent from 1990 to 2010. During this same period, the total Seattle population increased 18 percent. While the study area comprises 60 percent of the city's land area, it accounted for about eight percent of Seattle's population growth from 1990 to 2010.

Exhibit 3-10 shows the city's population by race over time, highlighting a shifting geographic pattern of major racial groups following the period of redlining and racial covenants discussed above. In Exhibit 3-11, we see the composition of the city's population by race in each decade since 1960. Exhibit 3-12 shows the share of the population of color in each census block from the 2010 Census. The Joint Assessment of Fair Housing (Seattle 2017a) found that people of color disproportionately live closer to major arterials, state highways, and Interstate 5. Non-Hispanic White people are, by contrast, disproportionately likely to live in areas where single-family housing predominates, and in proximity to Puget Sound, Lake Washington, and other shorelines. In other words, people of color are disproportionately likely to live in multifamily zones outside the EIS study area with two exceptions — single-family zones in southeast Seattle and near the Central Area, Squire Park, and Madrona/Leschi neighborhoods — where people of color comprise a substantial share of the population.

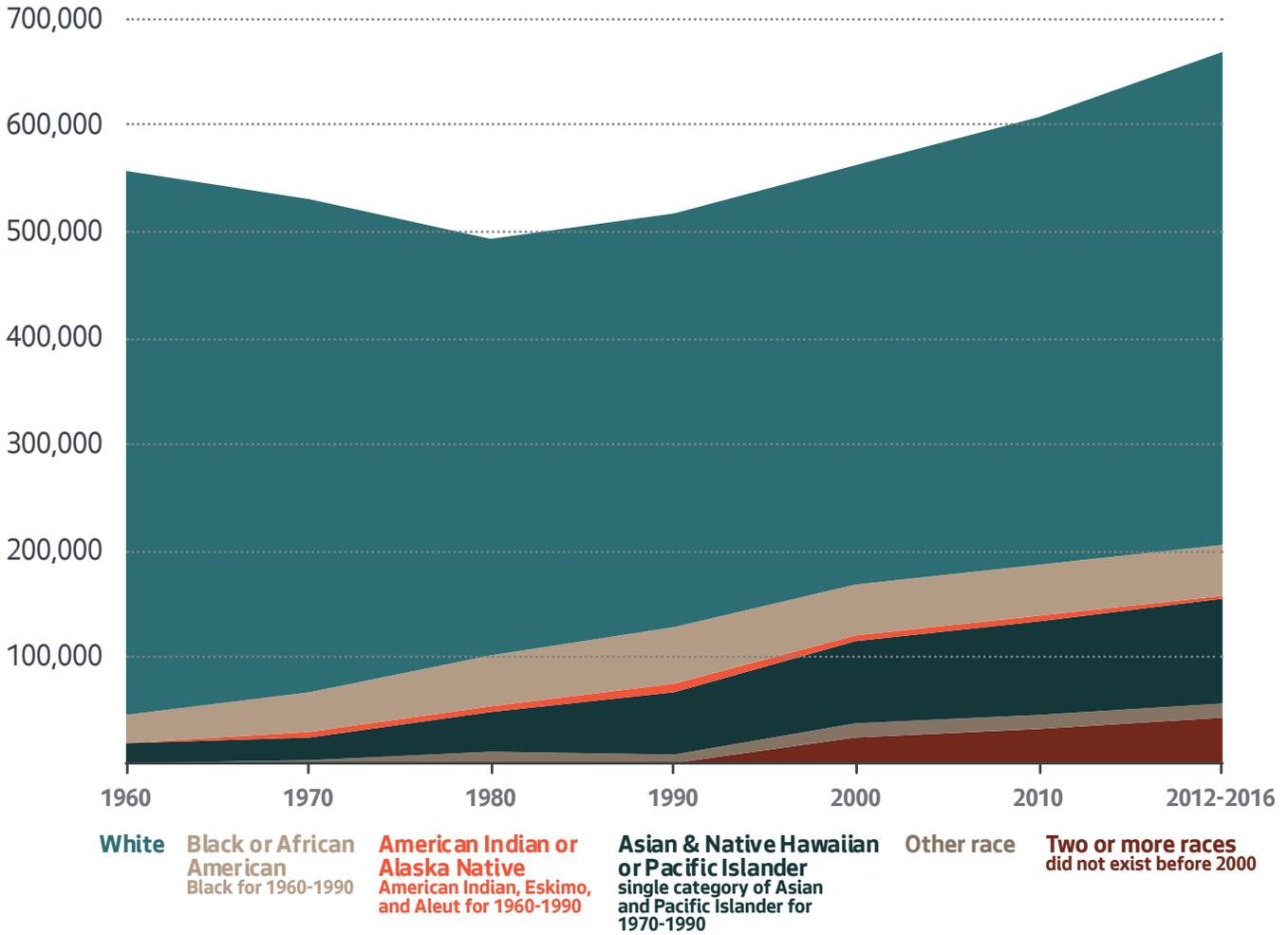
**Exhibit 3-10** Historical Geographic Distribution of Seattle Population by Race, 1970-2010

Source: U.S. Census Bureau



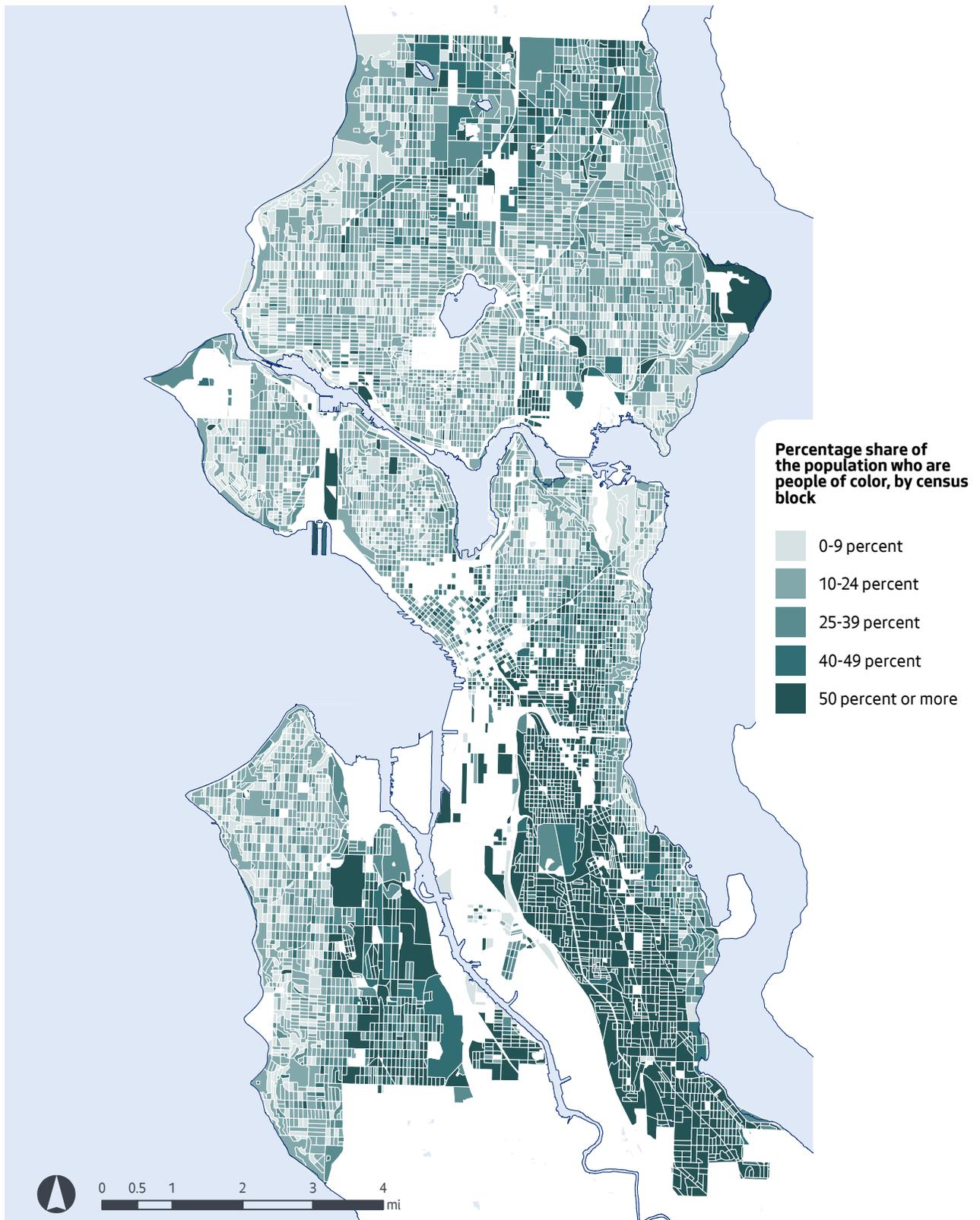
**Exhibit 3-11** Historical Seattle Population by Major Racial and Ethnic Group, 1960-2010

Source: U.S. Census Bureau



**Exhibit 3-12** Population Change People of Color by Census Tract Block, 1970-2010

Source: U.S. Census Bureau



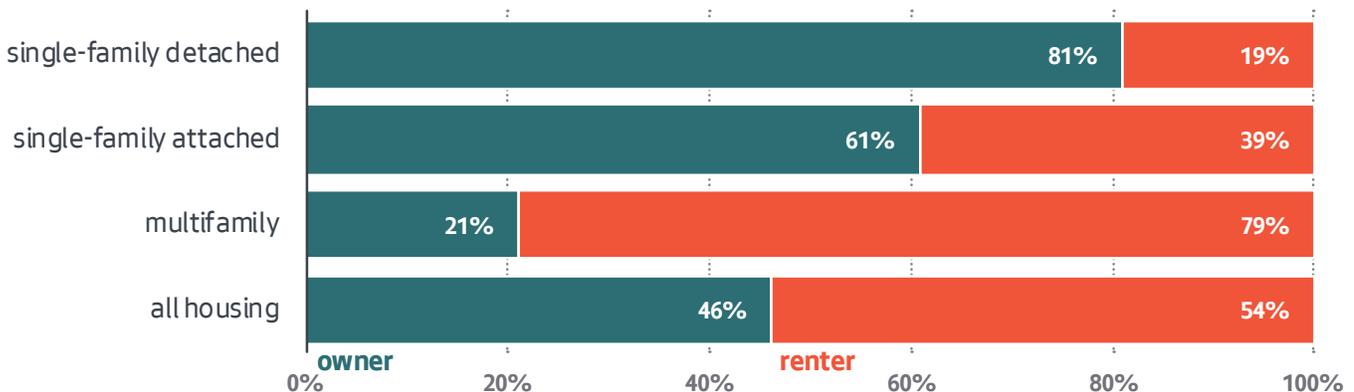
Census data describing the characteristics of households in one-unit structures gives us a picture of the population living in Seattle’s single-family zones, where most homes consist of one detached unit:

- About 44 percent of all Seattle homes are detached one-unit structures.
- Another five percent are attached one-unit structures like townhouses.
- Three in five Seattle residents live in these one-unit structures (detached or attached), and more than three-quarters of them own their home.

Exhibit 3-13 shows housing tenure (owner- versus renter-occupied housing units) by housing unit type (i.e., single-family attached, single-family detached, or multifamily housing). Citywide, 53.8 percent of homes are renter occupied and 46.2 percent owner occupied. If we break this down further, there is clear variation by race in homeownership rates. Exhibit 3-14 shows the tenure of housing units by the racial or ethnic group of its householder. Renting is more common than homeownership for householders of every racial and ethnic group except non-Hispanic White. Non-Hispanic White householders are slightly more likely to own than rent their home, while Black or African American and Hispanic or Latino householders are about three times more likely to rent than own.

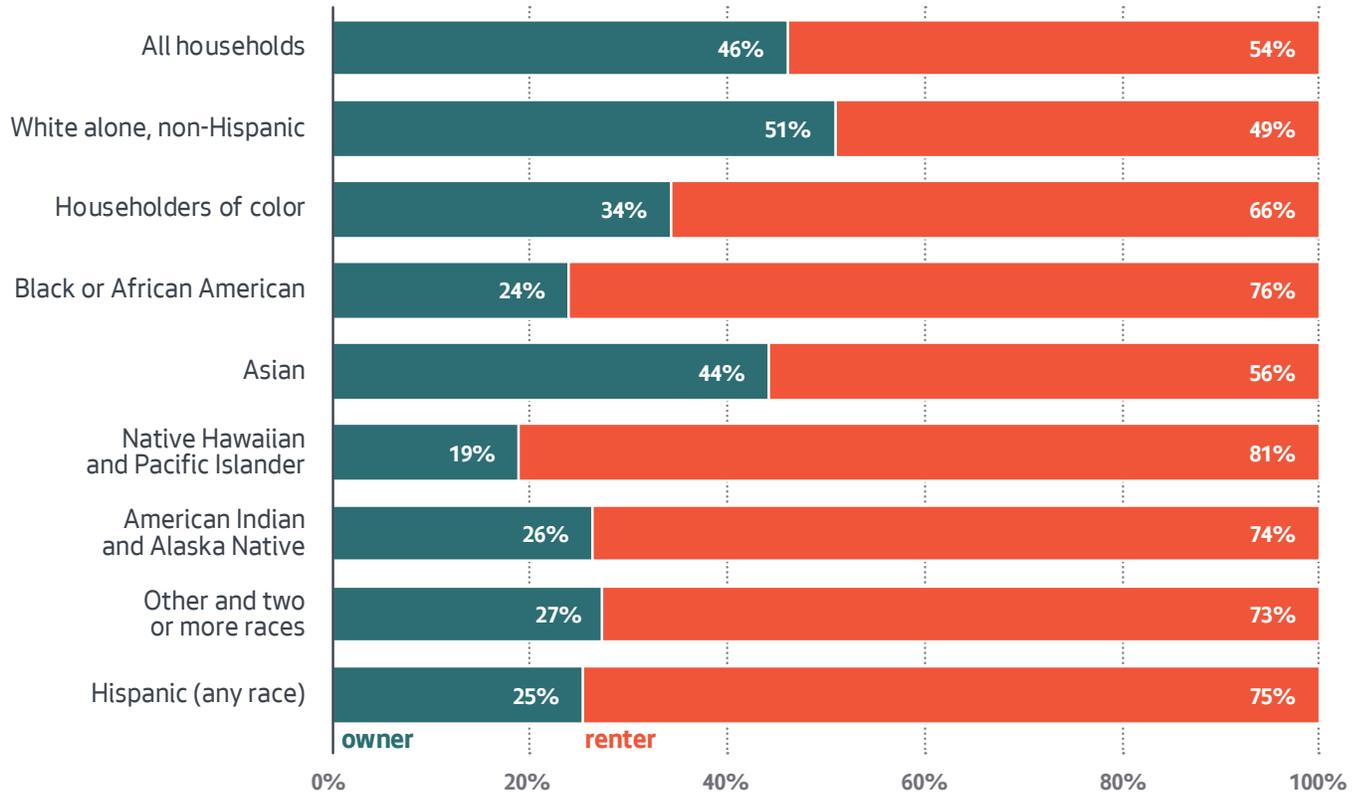
**Exhibit 3-13** Housing Tenure by Housing Unit Type, Seattle

Source: 2016 5-Year American Community Survey



**Exhibit 3-14** Housing Tenure by the Householder's Racial or Ethnic Group, Seattle

Source: 2016 5-Year American Community Survey



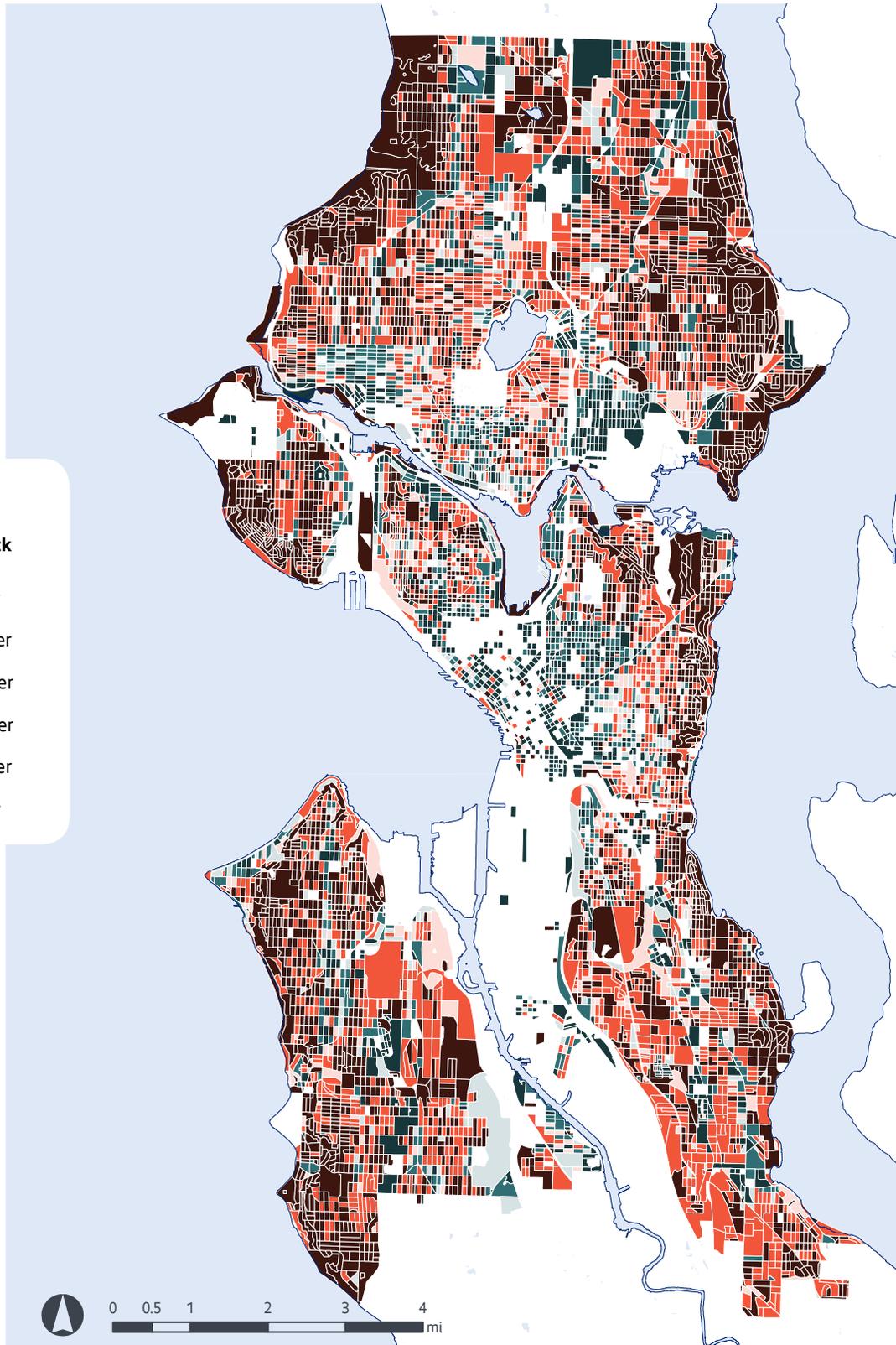
Homeownership also varies geographically. Exhibit 3-15 shows the percentage of households by census block who rent or own their home. According to the 2010 Census, 73.2 percent of housing units are owner occupied in the study area and 26.8 percent are renter occupied. Outside the study area, 27.0 percent of homes are owner occupied and 73.0 percent are renter occupied. Citywide, 54 percent of households are renters.

**Exhibit 3-15** Housing Tenure by Census Block

Source: 2010 Census

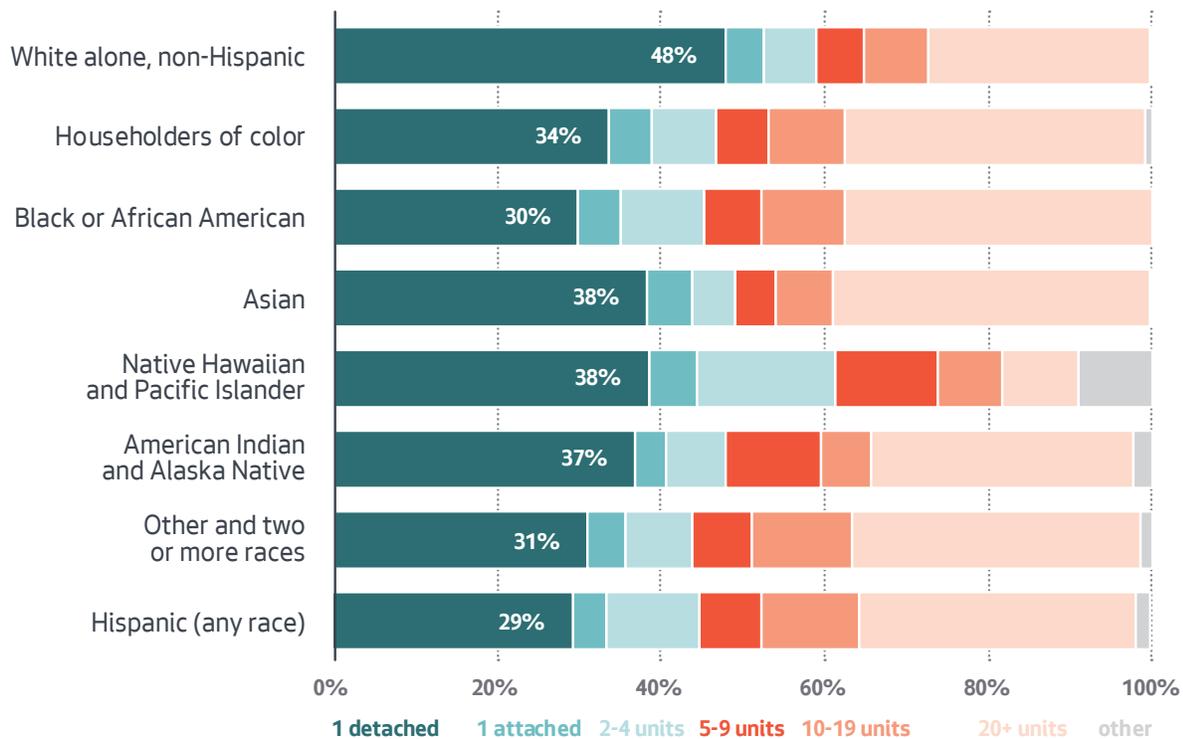
Percentage share of occupied housing units that are renter or owner occupied, by census block

-  > 80 percent renter
-  61-80 percent renter
-  50-60 percent renter
-  50-60 percent owner
-  61-80 percent owner
-  > 80 percent owner



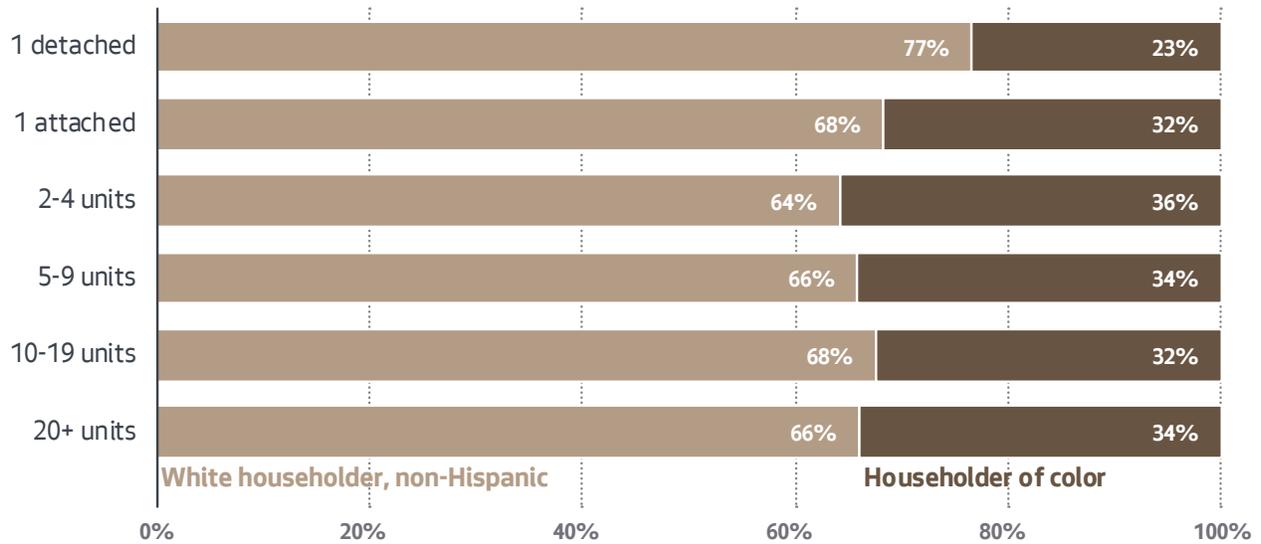
Like homeownership, the type of housing a household occupies also varies by race. Exhibit 3-16 shows that almost 48 percent of non-Hispanic White households live in detached one-unit structures. No other racial group exceeds 40 percent on this measure. One-third of all households of color, and less than 30 percent each of Black or African American households and Hispanic or Latino households, live in detached one-unit structures. More non-Hispanic White householders live in detached one-unit structures than any other housing type, while more householders of color live in apartment buildings with 20 or more units than any other unit type. Exhibit 3-17 presents the same data but with race distributed across unit type. The disparity between households with non-Hispanic White householders and householders of color is greatest for homes in detached one-unit structures. Non-Hispanic White householders occupy more than three-quarters of homes in detached one-unit structures. While the race and ethnicity of a householder is an imperfect proxy for a home's total population, these citywide statistics illustrate that housing type varies along racial lines and are suggestive of patterns in single-family zones, where detached one-unit structures are the only housing type allowed.

**Exhibit 3-16** Housing by the Number of Units in Structure and Race/Ethnicity of Householder, Seattle  
Source: 2016 5-Year American Community Survey



**Exhibit 3-17** Housing by the Number of Units in Structure and Race/Ethnicity of Householder, Seattle

Source: 2016 5-Year American Community Survey



One likely reason for this pattern is the high cost of housing in single-family zones and disparities in household income according to race. Exhibit 3-18 shows that, across the Seattle metropolitan region, households living in detached one-unit structures tend to have high incomes. Median income for households in detached one-unit structures is \$98,000. Only 22 percent of these households earn \$50,000 or less, which is where the median income for Black or African American households falls in the Seattle metropolitan region (see Exhibit 3-19, which shows median income for Seattle households). For non-Hispanic White households, median income was \$83,224, 12 percent above the city median, almost \$35,000 above households of color, and more than two-and-a-half times the median income of Black or African American households. These disparities are slightly sharper if we look specifically at households living in detached one-unit structures that own their home: 42 percent of these households earn more than \$120,000. Meanwhile, median income for households living in housing types other than detached one-unit structures is \$47,233.

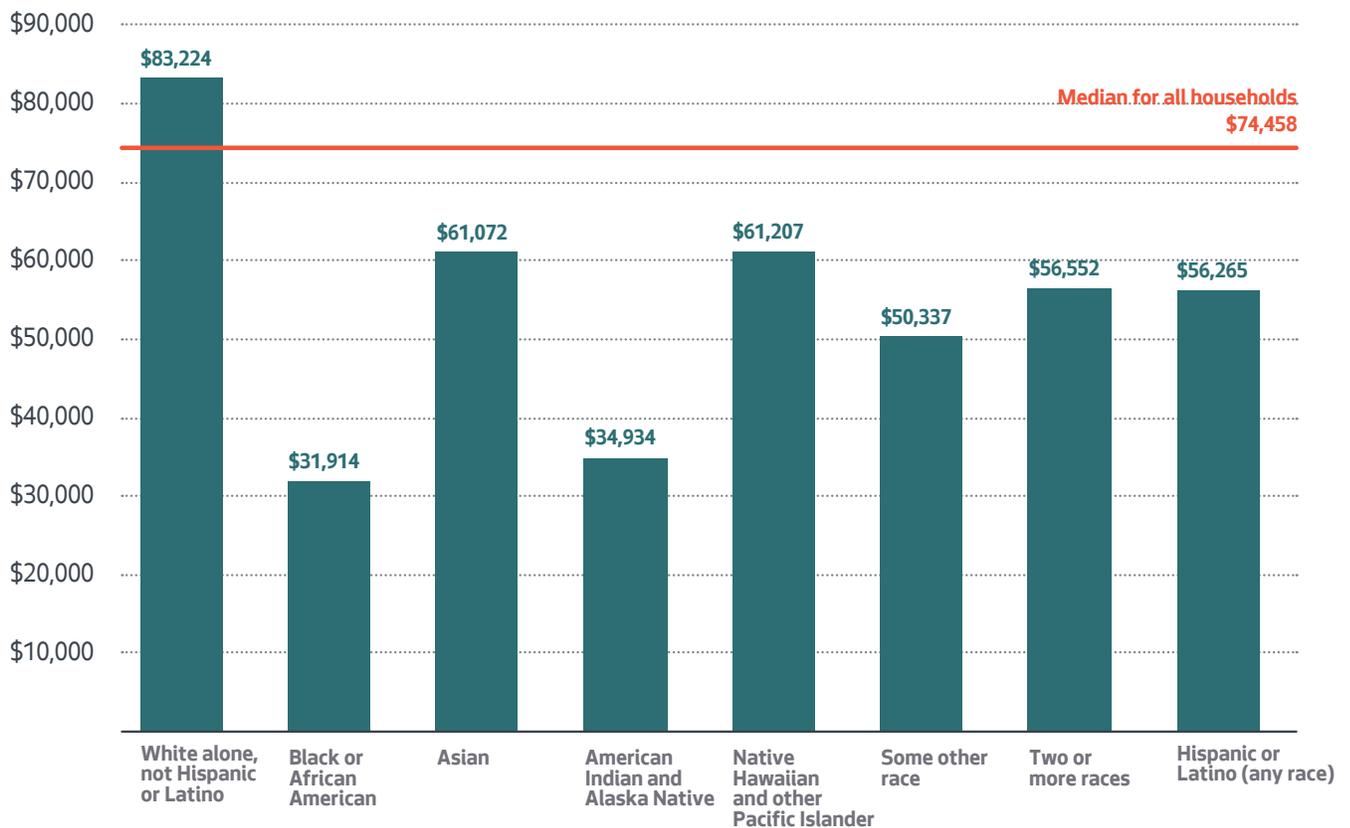
**Exhibit 3-18** Median Household Income by Number of Units in Structure, Seattle Metropolitan Area

Source: 2015 American Housing Survey



**Exhibit 3-19** Median Household Income by Race, Seattle

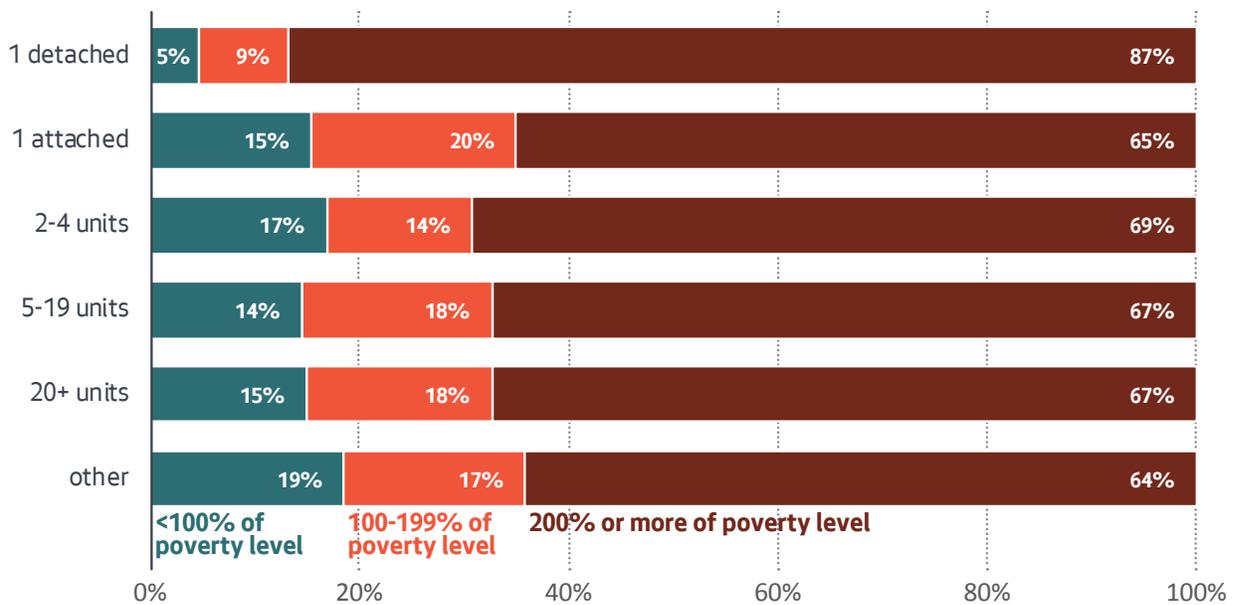
Source: 2016 5-Year American Community Survey



Another way to understand income disparity is examine household income relative to the poverty level. Exhibit 3-20 distributes households in the Seattle metropolitan area across three poverty categories according to units in structure. Relatively few households in detached one-unit structures are below the poverty level. The share of households below the poverty level is about three times higher for all household types other than detached one-unit structures. Only 14 percent of households in detached one-unit structures are below 200 percent of the poverty level, a common threshold to be eligible for certain assistance programs, while for most other housing types about one-third of households are below 200 percent of the poverty level.

**Exhibit 3-20** Median Household Income by Number of Units in Structure, Seattle Metropolitan Area

Source: 2015 American Housing Survey



## 3.2 Planning Context

### SEATTLE'S COMPREHENSIVE PLAN

Since 1994, the Comprehensive Plan has guided growth in Seattle in a manner that supports the City's core values. In October 2016, the City Council adopted the Seattle 2035 Comprehensive Plan (Seattle 2016a) and in October 2017, the Council adopted amendments to the plan (Seattle 2017b). The Seattle 2035 Comprehensive Plan was evaluated in an EIS finalized in May 2016 (Seattle 2016b). The Comprehensive Plan continues to emphasize the core values established in 1994, especially in the face of Seattle's continued population growth, housing shortage, and increasing income inequality.

The Seattle 2035 Comprehensive Plan EIS studied potential impacts of four different growth strategies. Each considered a different pattern of growth, but all anticipated growth of 70,000 housing units and 115,000 jobs in Seattle through 2035, the growth target allocated by the King County Countywide Planning Policies and the minimum that Seattle must plan to accommodate. The EIS also included a sensitivity analysis that analyzed the impacts of a hypothetical increase in housing growth greater than the City's adopted growth planning estimate. This sensitivity analysis evaluated growth of 100,000 new households through 2035.

A central feature of the Comprehensive Plan is the urban village strategy, an approach to growth management that concentrates most expected future growth in designated urban centers and villages. The Plan also anticipates that more modest growth will occur in various places outside urban villages, including long arterials where current zoning allows multifamily and commercial uses. While single-family zones outside urban villages are not assigned a specific share of the City's 20-year residential growth estimate, the Comprehensive Plan notes that "different housing types, such as accessory dwelling units or backyard cottages, could increase the opportunity for adding new housing units in these [single-family residential] areas."

Where this EIS considers the potential impacts of additional ADUs in the study area, we assume that any consequent household growth would not exceed the increment evaluated in the Comprehensive Plan EIS sensitivity analysis that considered growth of 100,000 households by 2035. Further, if Land Use Code changes contemplated in Alternatives 2 and 3 result in more ADU development than under Alternative 1 (No Action), we assume some new households living in the study area might have otherwise

occupied housing elsewhere in the area outside urban villages, like apartments or townhouses in places zoned for multifamily housing. In other words, additional ADU production could result in a partial shift of housing growth from multifamily and commercial areas outside the study area to single-family zones inside the study area.

## HOUSING AFFORDABILITY AND LIVABILITY AGENDA

### Affordable Housing

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Informally, the term affordable housing is used to describe a home where a household can afford its housing costs ~~and still have~~ with sufficient remaining income for basic needs like transportation, food, and healthcare. Formally, affordable housing is defined in the Land Use Code as "a housing unit for which the occupant is paying no more than 30 percent of household income for gross housing costs, including an allowance for utility costs paid by the occupant."

In recent years, addressing the critical need for housing, especially affordable housing for low-income households, has been a central feature of Seattle's planning context. In 2014, the City Council adopted Resolution 31546 (Seattle City Council 2014b), establishing the Housing Affordability and Livability Agenda (HALA). In July 2015, the HALA Advisory Committee identified 65 strategies to meet the City's ambitious goal of creating 50,000 homes, including preservation and production of 20,000 net new affordable homes, by 2025 (HALA Advisory Committee 2015). The committee's report discussed the history of housing in single-family zones, highlighting its contribution to Seattle's current land use patterns, where approximately 54 ~~65~~ percent of Seattle's land is zoned single-family. Single-family zoning limits the variety of housing options available in parts of the city and access for households with lower incomes to live in areas zoned single-family. Accordingly, the HALA Advisory Committee issued several recommendations focused on increasing access, diversity, and inclusion in Seattle's single-family zones.

Among these strategies was the recommendation to increase the supply of ADUs. The report noted that although "both [attached and detached] accessory units are allowed, citywide production has been lower than expected...." The report also underscored that ADUs offer several benefits, such as providing options for extended family sharing of housing resources, allowing homeowners to earn additional income, and offering additional rental housing options in family-friendly areas at a similar scale as surrounding single-family development. The HALA committee recommended three specific strategies to increase the supply of ADUs:

- **SF.1a.** Remove code barriers to accessory dwelling units and backyard cottages
- **SF.1b.** Create pre-approved standard plans for backyard cottages
- **SF.1c.** Develop a clemency program to legalize undocumented ADUs (HALA Advisory Committee 2015)

Strategy SF.1a focuses on removing barriers to ADUs through the types of Land Use Code changes evaluated in this EIS.

## Changes in single-family zones

In addition to increasing ADU production, another HALA recommendation was to allow a broader mix of lower-density housing types in single-family zones within the same building envelope allowed under current zoning. These housing types could include small lot dwellings, cottages or courtyard housing, rowhouses, duplexes, triplexes, and stacked flats.

## Mandatory Housing Affordability

A key HALA recommendation was to ensure that Seattle's growth supports affordability. Accordingly, the City is implementing MHA, a new policy requiring commercial and multifamily residential development to contribute to affordable housing. MHA requirements take effect when the City Council adopts zoning changes that increase development capacity (i.e., allow taller buildings and/or more floor area). To comply with MHA, developers must include income-restricted affordable homes in the proposed development or make a payment to support affordable housing development throughout Seattle. In 2017, the City Council adopted legislation to put MHA into effect in six neighborhoods: the University District, Downtown, South Lake Union, certain nodes in the Central Area, Chinatown-International District, and Uptown. The City evaluated the potential environmental impacts of implementing MHA in other urban villages and multifamily and commercial zones in an EIS that was finalized in October 2017 (Seattle 2017c). As described in Chapter 2, this EIS considers the impacts of applying MHA requirements to the creation of ADUs.

## GROWTH AND EQUITY ANALYSIS

In 2016, the City adopted the Growth and Equity Analysis as an appendix to the Seattle 2035 Comprehensive Plan (Seattle 2016a). This analysis informs elected officials and the public about potential future displacement impacts of the Comprehensive Plan's Growth Strategy on marginalized populations, like people of color and low-income households, and outlines potential tools for mitigating identified impacts and increasing access to opportunity for marginalized populations. The process involved developing the Displacement Risk Index and Access to Opportunity Index. These indices examine disparities in the benefits and burdens that marginalized populations experience as a result of growth. The Displacement Risk Index focuses on both the physical (direct) and economic (indirect) displacement pressures that marginalized populations face. The Access to Opportunity Index focuses on marginalized

populations' access to key determinants of social, economic, and physical well-being. See Section 4.1 for additional discussion of displacement.

The Growth and Equity Analysis categorized Seattle's urban villages using a displacement-opportunity typology. It also shows the relative level of displacement risk and access to opportunity for areas outside urban villages, including the single-family zones in the study area for this EIS. Much of the area north of the Ship Canal and most land along the Puget Sound and Lake Washington shorelines have low displacement risk, along with Magnolia, Queen Anne, Madison Park, and the western portion of West Seattle. In contrast, displacement risk is relatively higher for single-family zones in Rainier Valley; Delridge south to Westwood-Highland Park and South Park; and some areas at the northern end of the city. Access to opportunity also varies across the study area. Many single-family zones have relatively low access to opportunity, primarily because that measure emphasizes transit access and other factors more prevalent in urban villages. But access to opportunity is relatively high in some parts of the study area, particularly neighborhoods close to and north of Downtown like Queen Anne, Montlake, Madison Park, Wallingford, Fremont, Ravenna, and Bryant, among others.

### **SHORT-TERM RENTAL LEGISLATION**

In 2017, the City Council adopted Ordinances 125490 and 125483. Ordinance 125483 amended the Land Use Code to define short-term rentals as a commercial lodging use, updated standards for bed and breakfast uses, and applied the City's Rental Registration and Inspection Ordinance to include short-term rentals. Ordinance 125490 established a regulatory licensing framework for short-term rental platforms and operators, and bed and breakfast operators who utilize short-term rental platforms; these regulations go into effect in January 2019. This included establishing a cap on the number of dwelling units a person can operate as a short-term rental, and requires that all short-term rental operators obtain a short-term rental operator license.

Beginning in January 2019, short-term rental operators can obtain a license to offer one dwelling unit as a short-term rental, or two dwelling units if one is the operator's primary residence. Under existing ADU regulations where the owner must live on the property with an ADU, the owner could offer both the main house and the ADU for short-term rental use because one of the units must be their primary residence. Under the action alternatives that would allow two ADUs on the same lot, Seattle's short-term rental regulations would not allow both ADUs

and the main house to be operated as short-term rentals. Further, if the owner does not occupy the main house or either ADU as their primary residence, they could only offer only one of the units for short-term rental use. The housing analysis in Section 4.1 considers these rental operation possibilities when comparing valuation options for development outcomes under each alternative.

## **REDUCED DEVELOPMENT COSTS: PROGRAMMATIC ADU STRATEGIES**

As described in Chapter 1, the City Council in 2014 adopted Resolution 31547 (Seattle City Council 2014) outlining a work program to explore options that could boost ADU production. In addition to regulatory changes, Resolution 31547 recommended a review of best practices, including marketing and promotion to property owners about ADU opportunities, developing pre-approved design and plans, and streamlining financing programs.

Early analysis conducted in preparation for the Draft EIS confirmed that, absent other actions beyond changes to the Land Use Code, the overall cost of construction likely limits ADU development to relatively higher-income owners. To consider this finding further, with leadership from Councilmember Mike O'Brien's office, the City initiated a Racial Equity Toolkit (RET) in tandem with this EIS. The RET focuses on decreasing disparities in who benefits economically from ADU policies and on increasing housing choice for renters who are people of color across Seattle's single-family zones.

Through the RET process, the City will evaluate various strategies through a race and equity lens to ensure communities of color benefit from policies to spur development of ADUs. Possible strategies include increasing access to financing for homeowners interested in creating an ADU, especially homeowners with lower incomes, less available home equity, or difficulty obtaining and qualifying for a loan; reducing construction costs; outreach and education about ADU opportunities; and tools to support a homeowner through the development process. In addition to the RET work, when the Draft EIS was released in May 2018, Mayor Jenny Durkan announced that the City would develop pre-approved DADU plans.

Below we briefly describe some programmatic strategies the City could pursue in addition to and independent of the Land Use Code changes evaluated in this EIS. These efforts could involve a requirement that

### **Racial Equity Toolkit**

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A Racial Equity Toolkit (RET) is a process and set of questions to guide the development, implementation, and evaluation of policies, initiatives, programs, and budget issues to address their impacts on racial equity.

homeowners using City actions or investments offer their ADU at reduced rents for income-eligible households.

### **Financing**

Access to financing is often described as a key barrier for homeowners interested in adding an ADU to their property. Strategies the City could pursue include a programmatic or financial partnership with a nonprofit, lender, or other organization working to facilitate the financing and development process for homeowners building ADUs. Alternatively, a City loan program, similar to the City's existing [Home Repair Loan Program](#), could support the development of ADUs to provide housing for low-income households.

### **Reducing construction costs**

Construction cost is a primary factor in a homeowner's ability to create an ADU, especially since obtaining financing is more difficult for larger loans. Efforts to lower construction costs therefore support the City's goals of increasing access to ADUs and could make developing an ADU more feasible for lower-income homeowners. While the City could directly pursue strategies to lower costs, this EIS also recognizes ongoing private-sector innovation in design, construction, and ownership of ADUs, which could result in new, lower-cost models of ADU delivery in the future. See Exhibit A-17 in Appendix A for detail.

### **Pre-approved DADU plans**

Independent of the Land Use Code changes, the City is exploring options for developing pre-approved DADU designs. Under this program, Seattle Department of Construction and Inspection (SDCI) permitting staff would review and pre-approve standard plans as conforming to applicable building and energy codes. Homeowners interested in creating a DADU would save time and money by using a pre-approved plan, which would expedite the plan review process and reduce permit fees.

The housing analysis described in Section 4.1 and Appendix A yields estimates of future ADU production and single-family teardowns based in part on cost assumptions. Should these programmatic strategies come to fruition, ADU construction costs could marginally decrease over the course of the 2018-2027 period for which we estimate ADU production. To develop conservative estimates of future ADU production under each alternative, we consider this effect in our housing analysis. See Exhibit Exhibit A-17 in Appendix A for detail.

## **TREE REGULATIONS**

In 2018, the City Council proposed a new tree protection bill to increase tree canopy, promote stewardship of existing trees, and improve customer service for the public and applicants. The proposal would replace existing regulations established in the Tree Protection Ordinance, SMC 25.11. The proposal would define "significant tree" as a tree measuring more than six inches in diameter at 54 inches off the ground; require a permit to remove a significant tree; allow flexibility in development standards for preserving trees; set requirements for tree replacement; allow in-lieu payment when tree replacement is required; and specify tree retention requirements.

The City Council is considering granting flexibility from development standards for tree preservation, including increasing the height limit, reducing required parking to preserve trees, and reducing setback or yard requirements. Under the draft proposal released in August 2018, removal of one or more significant trees due to development in single-family zones, including creation of an ADU, would require a permit and an approved tree replacement plan that, at minimum, specifies mitigation for the loss of tree canopy in the form of on-site planting.

In addition to this citywide tree regulation proposal, the Preferred Alternative evaluated in this EIS includes policies intended to support tree preservation. Limitations on tree removal would apply for development resulting in rear yard coverage above 40 percent. Flexibility in the rear yard requirement would allow property owners to site DADUs in a way that eliminates or minimizes impacts on trees. The City can also clarify the requirement that site plans submitted with ADU permit applications must show the location of trees on the lot so that permit reviewers can consider tree impacts.

### **3.3 ADU Legislative History**

Seattle's history with ADUs is one of gradual change dating back to the 1950s. Policies for AADUs and DADUs have evolved separately, each change reflecting lessons learned from previous iterations. Recurring themes in the City's ADU policy development include:

- Addressing a perceived housing shortage
- Limiting the construction of detached units
- Addressing concerns for impacts on scale and urban form

Between 1900 and the 1950s, ADUs were commonly allowed under single-family zoning provisions. Gradually, this type of housing fell out of favor, and ADUs were no longer allowed in single-family zones. In 1993, in response to widespread concern about the escalating cost and availability of housing, the Washington State legislature required cities to develop legislation for ADUs (RCW 43.63A.215). Under the Growth Management Act (GMA) (RCW Chapter 36.70A), cities with a population of at least 20,000 people were required to allow ADUs in any neighborhood, with regulations, conditions, and limitations left to the discretion of the local legislative authority. In response, Seattle passed Ordinance 117203 in 1994 (Seattle City Council 1994), allowing AADUs in all single-family zones.

In 1998, the City Council passed Ordinance 119241 (Seattle City Council 1998) and established the Demonstration Program for Innovative Housing Design to diversify Seattle's housing supply and provide alternatives to conventional detached single-family houses, condominiums, and apartments. Using a competitive selection process that required Design Review, the Demonstration Program tested innovative residential design concepts that created flexibility for small housing types not allowed under existing regulations, including DADUs. In its 2003 Seattle's Housing Choices Report (Seattle 2003), the Seattle Planning Commission discussed lessons from the Demonstration Program, summarized community feedback, and recommended allowing DADUs in single-family zones throughout the city.

AADUs and DADUs have been allowed in Seattle's single-family zones since 1994 and 2009, respectively.

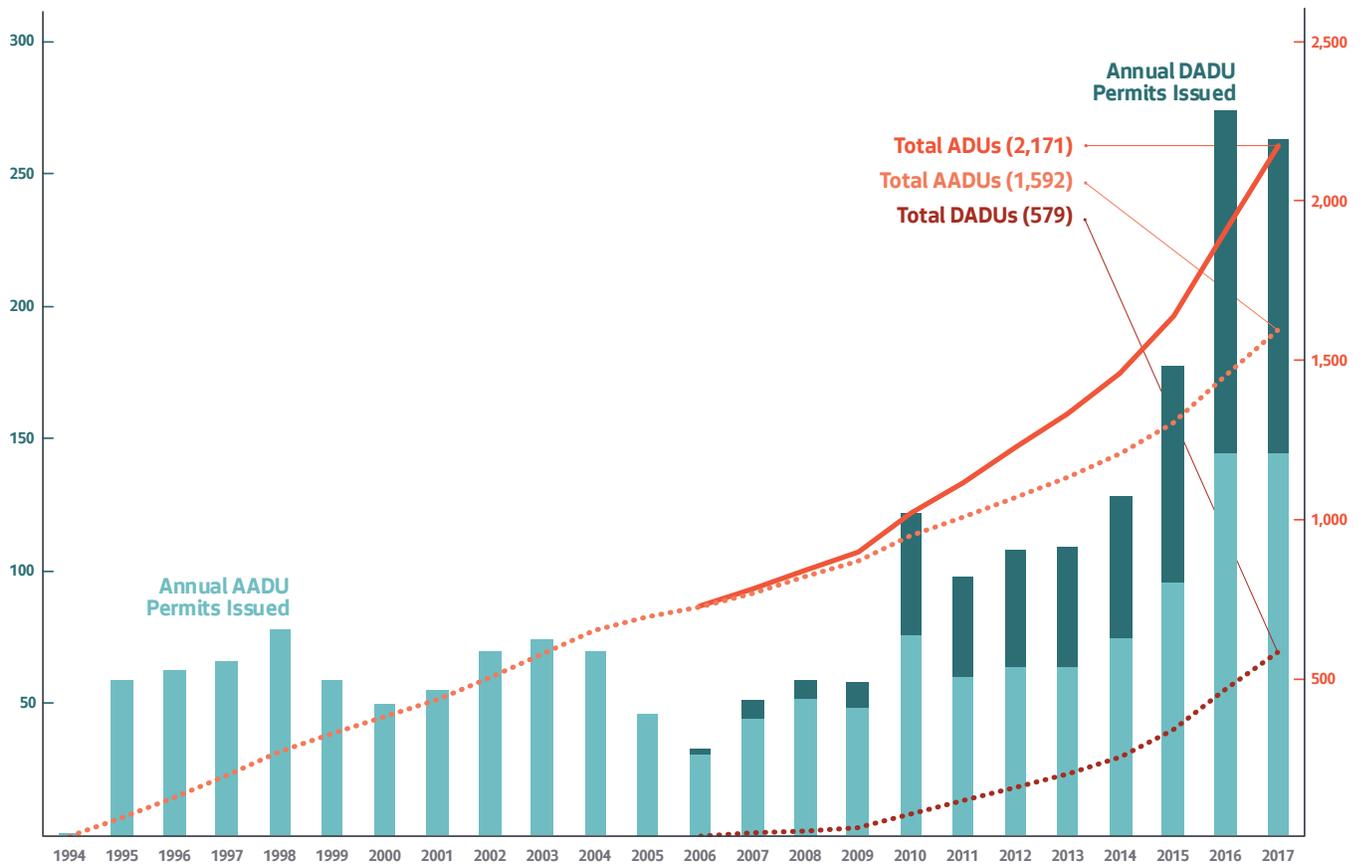
Building on the results of the Demonstration Program, in 2005 Mayor Greg Nickels proposed a DADU pilot program. In August 2006, the City Council adopted Ordinance 122190 (Seattle City Council 2006) allowing DADUs in southeast Seattle (south of Interstate 90 and east of Interstate 5). By 2009, 17 DADU permits had been issued and the Seattle Department of Planning and Development (DPD) proposed legislation to allow DADUs in single-family zones citywide. After extensive public engagement, the City Council unanimously passed and Mayor Nickels signed Ordinance 123141 (Seattle City Council 2009).

Following passage of Ordinance 123141, slightly more than 200 DADUs were permitted between 2010 and 2014, an average of about 45 per year (Exhibit 3-21). In response to the sluggish pace of construction, the City Council in September 2014 adopted Resolution 31547 (Seattle City Council 2014a) directing DPD staff, now at the Office of Planning and Community Development (OPCD), to explore policy changes that would spur creation of both AADUs and DADUs. Council directed OPCD staff to examine regulatory changes, incentives, and marketing and promotion strategies

to boost ADU production. In response to the Council Resolution, OPCD proposed Land Use Code similar to the changes analyzed in this EIS.

In May 2016, the City prepared an environmental checklist evaluating the potential environmental impacts of the proposed changes to the Land Use Code, and issued a determination of non-significance. The determination of non-significance 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 (Tanner 2016). Based on the Hearing Examiner’s decision, the Seattle City Council prepared this Environmental Impact Statement (EIS) in accordance with the Washington State Environmental Policy Act (SEPA).

**Exhibit 3-21** ADUs Constructed between 1994 and 2017



## ADU DEVELOPMENT IN PEER CITIES

Many other U.S. cities allow ADUs in their respective low-density residential neighborhoods. Most relevant for Seattle's planning context are Portland, Oregon, and Vancouver, British Columbia, two cities often regarded for their relatively high ADU production. Exhibit 3-22 characterizes key features of ADU regulations in those cities. In Portland, ADU production increased markedly in 2010 when the City decided to waive system development charges for ADUs, typically \$10,000-20,000 per unit; in 2016 Portland extended the waiver through July 2018. In Vancouver, in 2016 approximately 30,125 houses had an AADU, called "secondary suites" (Census 2016, Statistics Canada), and through 2017 Vancouver had 3,317 constructed and permitted DADUs, called "laneway homes," first allowed in 2009 (City of Vancouver, 2018). In 2017, Vancouver issued permits for 692 one-family dwellings (i.e., single-family houses), of which 404 (58 percent) included a secondary suite (City of Vancouver, 2017). See Exhibit 3-23 for additional details.

Exhibit 3-22 Key Features of ADU Regulations in Portland, Oregon, and Vancouver, British Columbia

	Portland, OR	Vancouver, BC
<b>Number of ADUs allowed</b>	1 <sup>1</sup>	2
<b>Off-street parking for ADU?</b>	No	One space required for all units on the lot (including main house)
<b>Owner-occupancy required</b>	No	No
<b>Minimum lot size for a DADU</b>	n/a (minimum lot size for any new construction varies by zone)	32 feet wide
<b>Maximum square footage</b>	No more than 75% of the living area of the main house or 800 square feet, whichever is less.	AADU: $\geq$ 400 sq. ft. and $\leq$ area of main house DADU: Varies by lots size (16% of lot size) with absolute maximum of 900 sq. ft.
<b>Maximum DADU height</b>	20 feet outside required setbacks 15 feet within required setbacks	15 feet for 1 story 20 feet for 1.5 story
<b>Maximum coverage</b>	$\leq$ principal unit and $<$ 15% of lot	Site coverage must not exceed the permitted site coverage under the applicable district (~40%); allows for additional 5% of lot coverage for a one story DADU
<b>Reduced predevelopment costs</b>	Yes	No
<b>Maximum FAR limit</b>	n/a	0.6
<b>Notes</b>	Features on DADU like windows, roof pitch, trim, and finishes, must match the main house	Allowed only on sites with alley access, on corner lots served by an alley, or on a through lot.  DADU must be located to preserve existing trees. Relaxations for location, massing, and parking standards may be allowed in order to retain significant trees.
<b>Average number of ADUs permitted per year: 2010-2016<sup>2</sup></b>	278	696

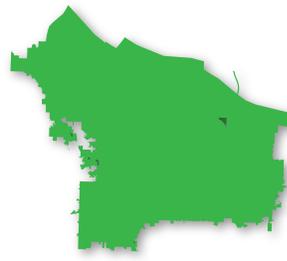
1 The City of Portland is currently considering adoption of new standards, including applying FAR limits in certain zones and allowing two ADUs on one lot (see Residential Infill Project).

2 The average number of ADUs constructed per year in Seattle during this same period is 147.

**Exhibit 3-23**  
Comparison of ADUs in Seattle,  
Portland, and Vancouver



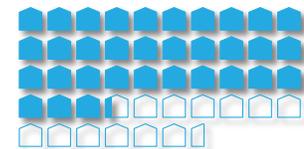
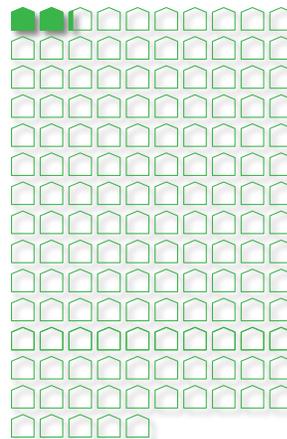
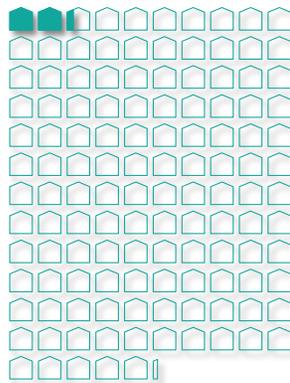
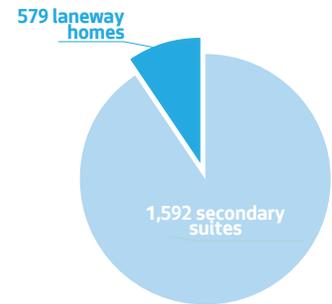
**Seattle**  
83.8 sq. mi.  
713,700 residents (2016)  
8,517 people / sq. mi.



**Portland**  
145 sq. mi.  
639,863 residents (2016)  
4,412 people / sq. mi.



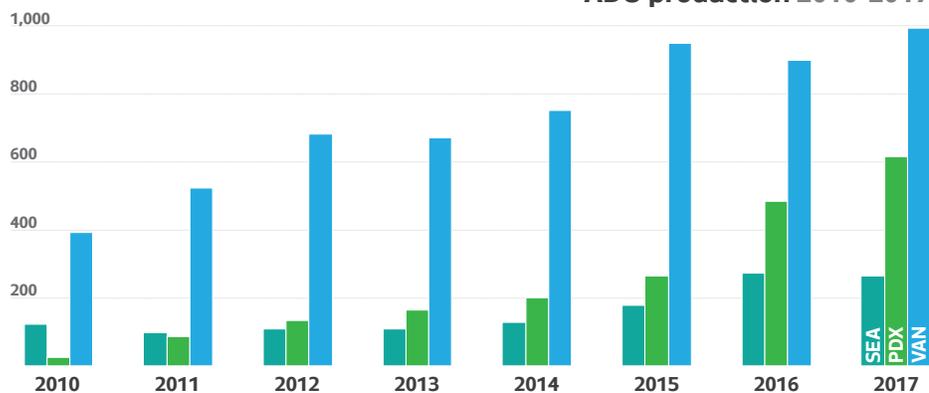
**Vancouver**  
44.4 sq. mi.  
631,486 residents (2016)  
14,222 people / sq. mi.



1,000 single-family homes  
1,000 ADUs

**ADUs & single-family housing stock**

**ADU production 2010-2017**



# 4 Environmental Analysis

This chapter describes existing conditions in the EIS study area and potential environmental impacts of the proposed Land Use Code changes to the following elements of the environment.<sup>1</sup>

- 4.1 Housing and Socioeconomics 4-3
- 4.2 Land Use 4-43
- 4.3 Aesthetics 4-85
- 4.4 Parking and Transportation 4-163
- 4.5 Public Services and Utilities 4-191

This list was developed based upon elements of the environment that were identified by the Seattle Hearing Examiner in her 2016 decision as requiring additional analysis, and no additional elements of the environment were identified as a result of the City's subsequent EIS scoping process.

To evaluate potential impacts to those elements of the environment we analyzed the current level of ADU production under Alternative 1 (No Action) and the level of ADU production anticipated from the Land Use Code changes proposed under Alternatives 2 and 3 and the Preferred Alternative.

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<sup>1</sup> SEPA requires analysis of adverse impacts to the physical environment, which includes the natural or built environment (RCW 43.21C.110, WAC 197-11-440 (6) (e)). SEPA allows but does not require an EIS to consider other factors that may affect an agency decision, such as socio-economic impacts (WAC 197-11-448, WAC 197-11-440 (8)).

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## 4.1 Housing and Socioeconomics

This section considers the impacts of the proposed Land Use Code change on housing and socioeconomics. Specifically, we first evaluate the following questions:

- **Underlying Development Economics.** How might the proposed changes alter the underlying real-estate economics in single-family zones? Could the proposed changes make property in single-family zones more attractive as rental investments rather than as owner-occupied assets?
- **ADU Production.** How many ADUs could be created given the proposed policy changes in each alternative?

This analysis allows us to consider the following types of impacts resulting from the proposed alternatives:

- **Affordability.** What impacts could the proposed changes have on housing affordability?
- **Displacement.** How might the potential housing and socioeconomic impacts vary by neighborhood? What are the potential impacts on marginalized populations (low-income people, people of color, and non-native English speakers)?

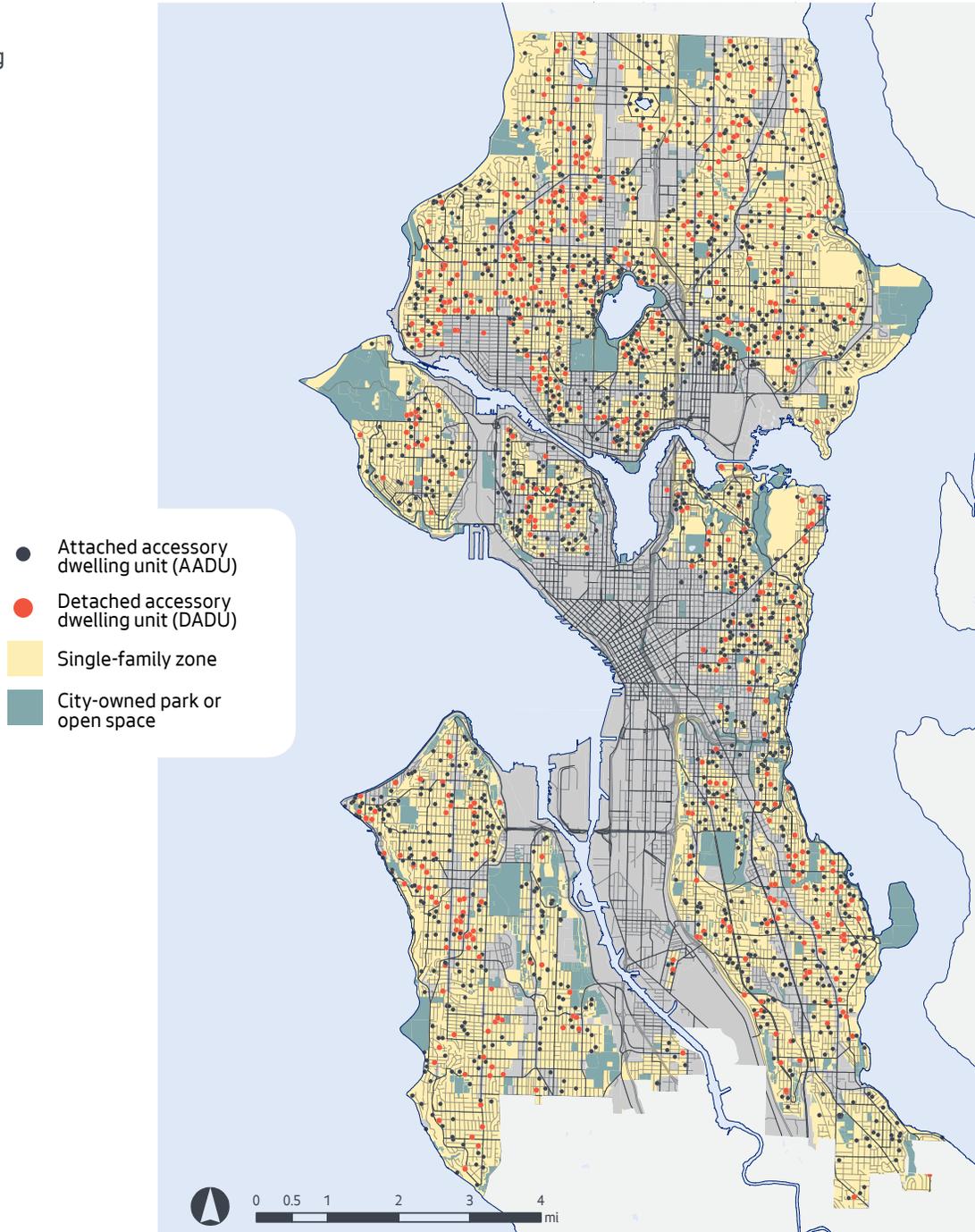
### 4.1.1 Affected Environment

#### HOUSING

Seattle has about 348,000 housing units. Between 2010 and 2017, the city gained about 40,000 new housing units. Based on [American Community Survey \(ACS\)](#) data, about 44 percent of homes in Seattle are located in one-unit detached structures, most, but not all, of which are in single-family zones.

Currently, less than two percent of Seattle's roughly 135,000 lots in single-family zones have an AADU. Since their legalization citywide in 2010, about 550 DADUs have been constructed or permitted. On average, 69 DADUs have been permitted annually since 2010, with the highest annual permit volumes in 2016 and 2017 (129 and 118 DADUs, respectively). Exhibit 4.1-1 shows the distribution of Seattle's ADUs.

**Exhibit 4.1-1**  
Distribution of Existing  
ADUs in Seattle



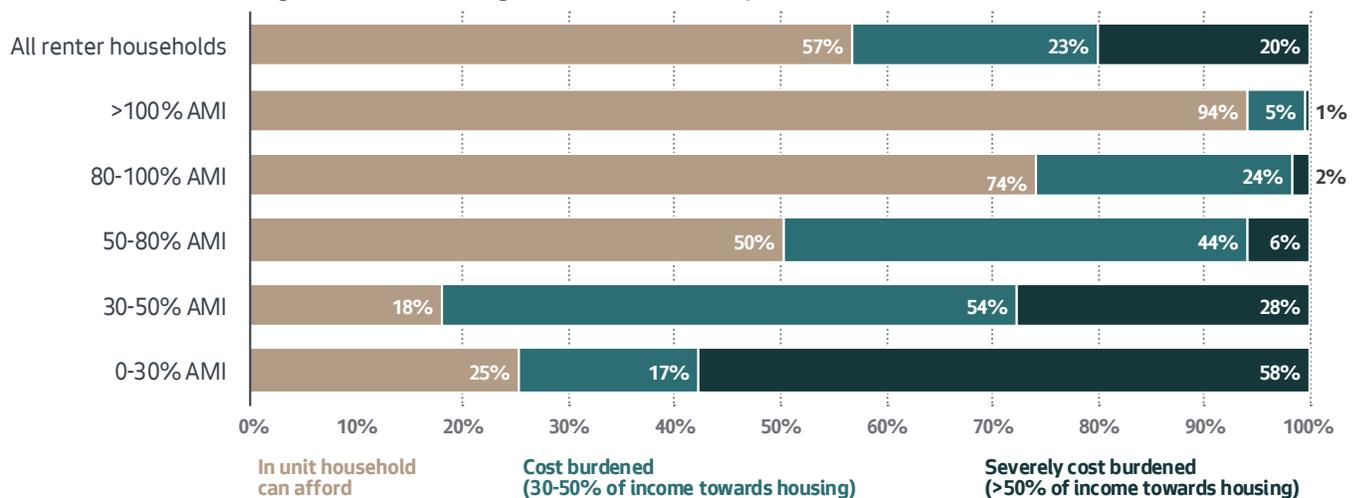
## HOUSING AFFORDABILITY

Housing affordability is typically expressed as a measure of housing costs in relation to household income. The standard for housing affordability is housing costs, including basic utilities, that amount to 30 percent or less of a household's gross income. Households paying more than 30 percent of their gross income for housing costs may have difficulty affording necessities such as food, clothing, transportation, and medical care. The U.S. Department of Housing and Urban Development (HUD) considers households paying more than 30 percent of their income for housing as "cost-burdened" with respect to housing. Households that pay more than 50 percent of their income for housing costs are considered "severely cost-burdened." Housing cost burden is a key measure of housing need.

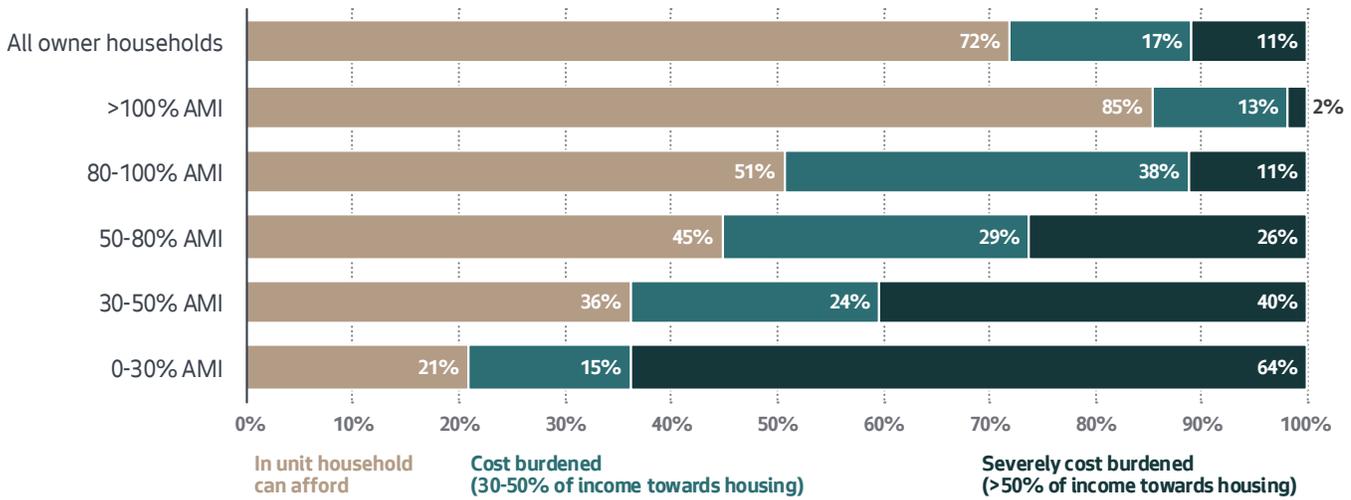
### Housing Cost Burden

HUD estimates that 37 percent of all Seattle households are either cost-burdened or severely cost-burdened. Renter households are significantly more likely to experience cost burden than owner-occupied households. And they are nearly twice as likely to be severely cost-burdened: 20 percent of renter households are severely cost-burdened compared to 11 percent of owner households. Lower-income households are most likely to experience cost burden. Sixty-eight percent of households with incomes less than 80 percent of area median income (AMI) spend more than 30 percent of their income on housing, while 37 percent spend more than half their income on housing. Exhibit 4.1-2 and Exhibit 4.1-3 show how cost burden varies among renter and owner households at various income levels.

**Exhibit 4.1-2** Housing Cost Burden among Renter Households by Household Income

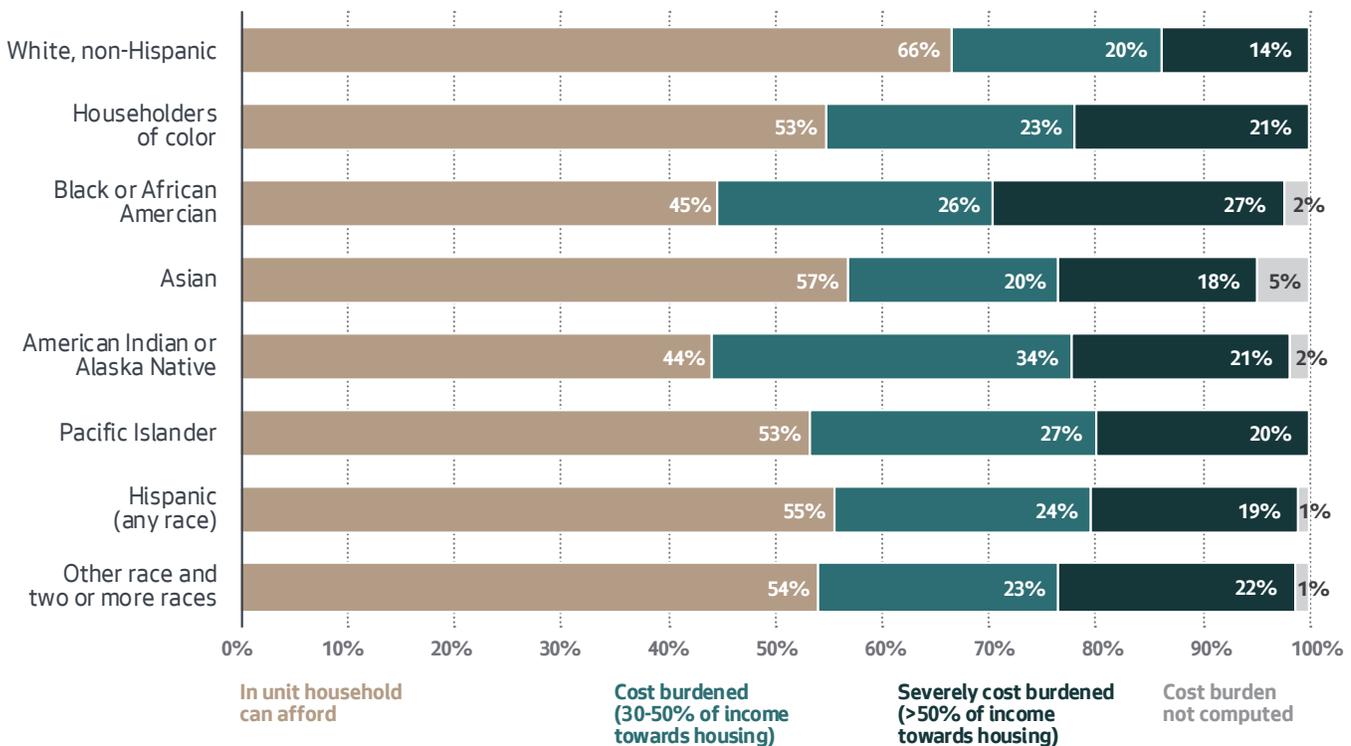


**Exhibit 4.1-3** Housing Cost Burden among Owner Households by Household Income



We also see disparity in cost burden among households of different racial and ethnic backgrounds. As shown in Exhibit 4.1-4, two-thirds of households with a non-Hispanic White householder are not cost burdened and only 14 percent are severely cost burdened, the highest and lowest shares for any racial category, respectively. More than half of households with a Black or African American householder experience some level of housing cost burden.

**Exhibit 4.1-4** Housing Cost Burden by Race and Ethnicity of Householder

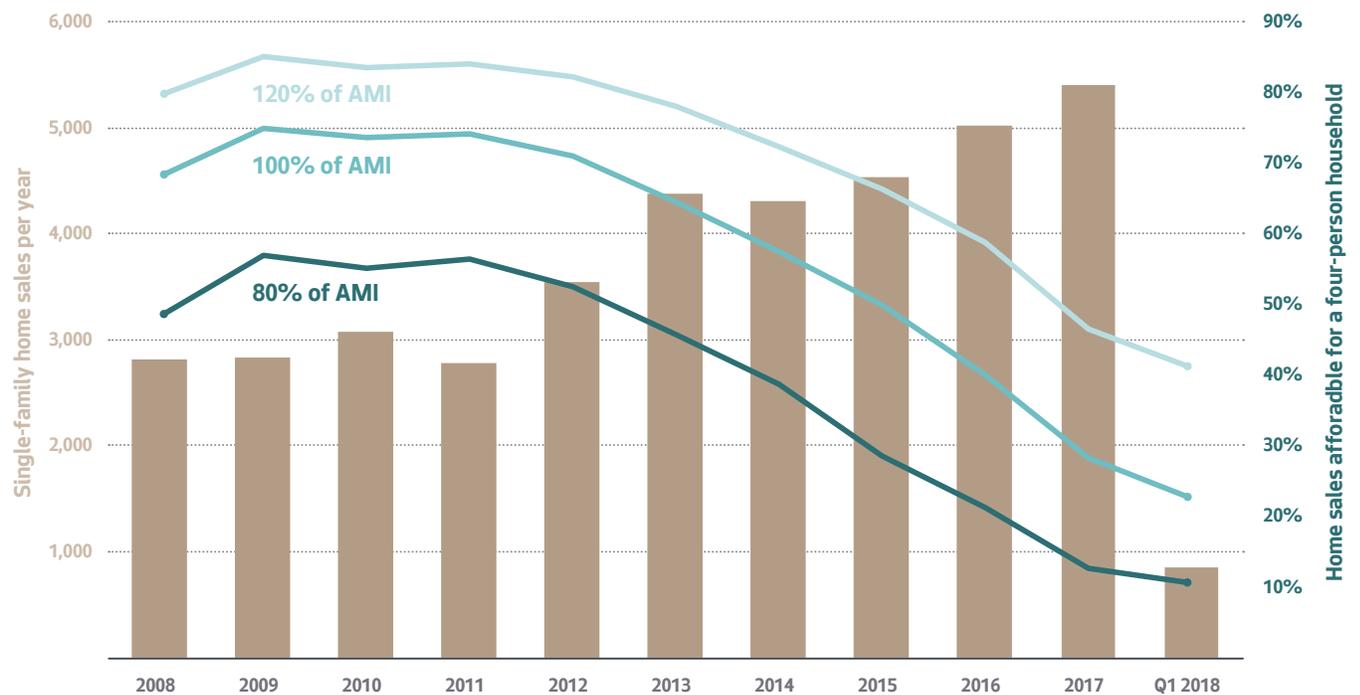


## Affordability of Ownership Housing

Sales prices for homes in Seattle have risen substantially in recent years. According to the latest data from the Northwest Multiple Listing Service (NWMLS), the median closed sales price for residential units in King County in 2017 was \$627,000. Exhibit 4.1-5 presents information about the number and affordability of homes sold from 2008 through the first quarter of 2018 in Seattle's single-family zones. The share of home sales affordable to a four-person household has declined steadily in recent years.

**Exhibit 4.1-5** Home Sales in Single-Family Zones, 2008-2018

Source: City of Seattle analysis of King County Assessor's data



**New in the FEIS** Exhibit 4.1-5 is a new exhibit in the Final EIS.

As shown in Exhibit 4.1-6, since 2016, only about 12 percent of single-family homes sold in Seattle were at a price affordable to a four-person household earning 80 percent of AMI. About one-quarter of homes sold were affordable to a four-person household with an income of 100 percent of AMI, and less than half for a household with an income of 120 percent of AMI. For two- or three-person households, whose median income is lower, even fewer home sales would be affordable at each percentage of AMI. This analysis assumes a best-case scenario for

financing, e.g., good credit scores. Further, this analysis does not consider whether the down payment (assumed here to be 20 percent of the sale price) would be affordable to households. For the 2018 median home price of \$800,000, a down payment of 20 percent would require \$160,000 in cash.

**Exhibit 4.1-6** Affordability of Single-Family Home Sales in Seattle

Source: City of Seattle analysis of King County Assessor's data

**New in the FEIS**

Exhibit 4.1-6 is a new exhibit in the Final EIS.

	Number of sales	Average home sales price <sup>3</sup>	Median home sales price <sup>3</sup>	Share of home sales affordable for a four-person household (annual income) <sup>2</sup>		
				80% of AMI (\$80,250)	100% of AMI (\$100,300)	120% of AMI (\$120,350)
<b>2008</b>	2,808	\$596,235	\$489,000	48%	68%	80%
<b>2009</b>	2,830	\$535,317	\$449,963	57%	75%	85%
<b>2010</b>	3,068	\$540,673	\$450,000	55%	74%	83%
<b>2011</b>	2,779	\$533,773	\$450,000	56%	74%	84%
<b>2012</b>	3,545	\$541,807	\$467,500	52%	71%	82%
<b>2013</b>	4,382	\$595,816	\$504,350	46%	64%	78%
<b>2014</b>	4,309	\$649,888	\$550,000	39%	57%	72%
<b>2015</b>	4,538	\$715,514	\$601,000	29%	50%	66%
<b>2016</b>	5,025	\$778,334	\$670,000	21%	40%	59%
<b>2017</b>	5,395	\$875,780	\$753,800	13%	28%	47%
<b>2018<sup>1</sup></b>	845	\$917,659	\$800,000	11%	23%	41%

1 2018 numbers are through first quarter.

2 Analysis assumes 30-year loan term, down payment of 20%, 4.0% interest rate, no PMI, \$1,000 annual homeowners insurance premium, and 1.0% property tax. No projection included for increases in property taxes. Unlike affordability models for rental housing, the cost of basic utilities is not included. AMI levels are current as of May 2018. Analysis of affordability by income level uses inflation-adjusted sales prices.

3 Average and median sales prices listed here are not inflation adjusted.

## Affordability of Rental Housing

According to the 2012-2016 American Community Survey ACS, 19 percent of detached one-unit structures are renter occupied (25,449 housing units). In 2016, the City analyzed the affordability of unsubsidized occupied rental housing based on surveys conducted by Dupre + Scott Apartment Advisors (Dupre + Scott Apartment Advisors, 2017). The analysis included data on detached single-family homes operated as rental units. Exhibit 4.1-7 summarizes gross rents for single-family rentals and the income levels needed to afford them. According to 2016 Dupre + Scott survey data, median rent for a three-bedroom single-family house was \$2,892 per month, which would require a household income of at least 123 percent of area median income (AMI) to ensure affordability. The 2016 study found that affording a single-family rental at the 25th percentile market-rate rent requires a household income at the 100 percent of AMI level. For households with incomes of 80 percent of AMI, even two- or three-bedroom single-family homes with rents at the 25th percentile, a common marker of rent for the least expensive homes on the market, are out of reach. Exhibit 4.1-8 shows the share of single-family rentals by number of units at each affordability level.

### **Exhibit 4.1-7** Cost of a Single-Family Rental and Required Income Levels

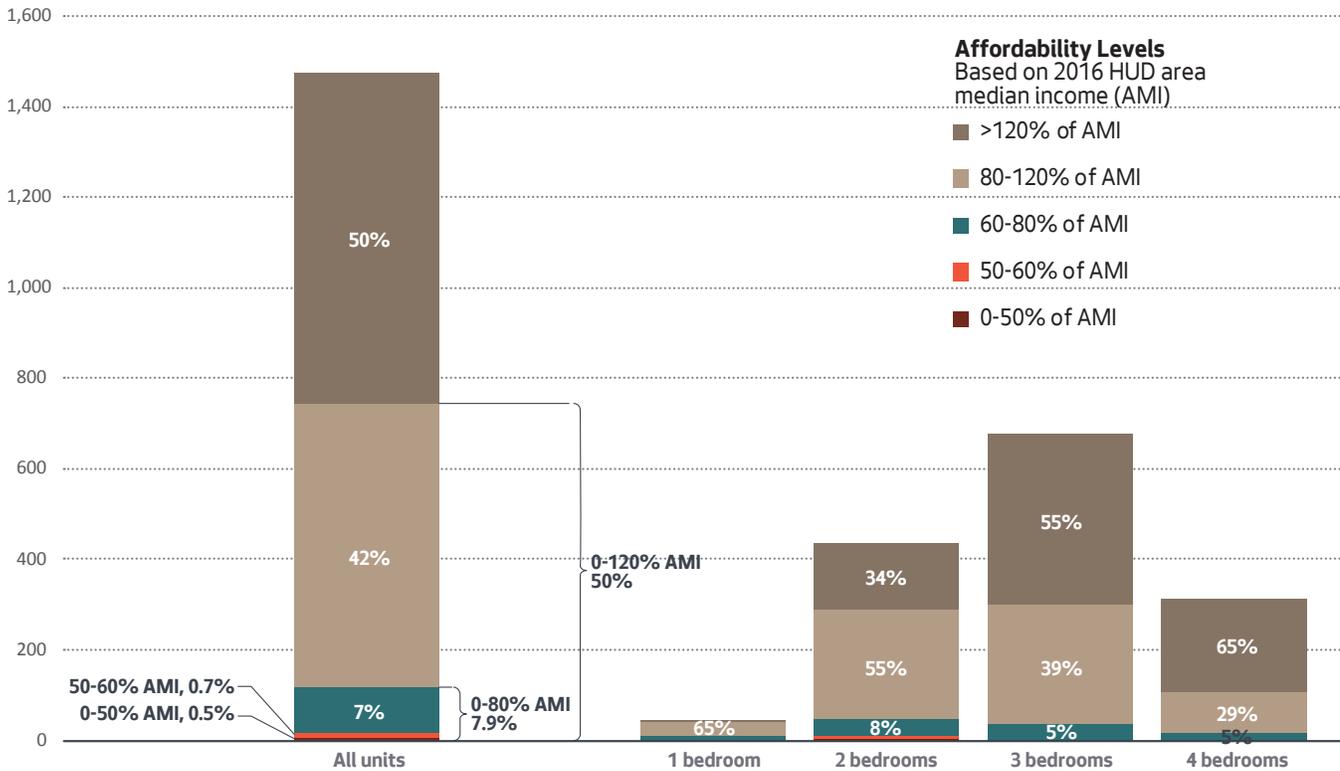
Source: City of Seattle analysis of custom data tabulations from Dupre + Scott Apartment Advisors.

Single-family rentals	1 BR	2 BR	3 BR	4 BR	Weighted aggregate (all unit sizes)
<b>Average rent</b>	\$1,607	\$2,237	\$2,975	\$3,620	
	95% of AMI	110% of AMI	127% of AMI	138% of AMI	123% of AMI
<b>Median rent</b>	\$1,588	\$2,163	\$2,892	\$3,497	
	94% of AMI	106% of AMI	123% of AMI	133% of AMI	119% of AMI
<b>25th percentile rent</b>	\$1,331	\$1,749	\$2,468	\$2,925	
	79% of AMI	86% of AMI	105% of AMI	112% of AMI	100% of AMI

Based on Dupre + Scott 2016 rent survey data for market-rate rental units. Figures reflect rent plus estimated cost of tenant-paid utilities. Small numbers of studios in single-family rentals were omitted to streamline analysis.

**Exhibit 4.1-8** Affordability of Unsubsidized Single-Family Rental Units, Overall and by Unit Size (Number of Bedrooms)

Source: City of Seattle analysis of custom data tabulations from Dupre + Scott Apartment Advisors.



## DISPLACEMENT

In the context of housing, displacement refers to a process wherein households are compelled to move from their homes involuntarily due to the termination of their lease or rising housing costs or another factor. This is different than voluntarily choosing to move. There are three different kinds of displacement occurring in Seattle: physical, economic, and cultural. Physical displacement is the result of eviction, acquisition, rehabilitation, or demolition of property, or the expiration of covenants on rent- or income-restricted housing. Economic displacement occurs when residents can no longer afford rising rents or costs of homeownership like property taxes. Cultural displacement occurs when residents are compelled to move because the people and institutions that make up their cultural community have left the area.

Not all households are equally vulnerable to displacement. Renters are at higher risk of physical displacement than homeowners. Marginalized populations (including people of color, low-income people, immigrants and refugees, and English language learners) are also more vulnerable

to displacement. To better understand which areas of Seattle are at higher risk of displacement, the Seattle 2035 Growth and Equity Analysis created a displacement risk index (Seattle 2016). This index combines data about vulnerability, development potential, and market conditions to illustrate variation in displacement risk across the city. We use the Seattle 2035 displacement risk index to contextualize the results of our analysis and how the alternatives may affect physical, economic, and cultural displacement.

## Physical Displacement

Various circumstances can cause physical displacement, including demolition of existing buildings to enable the construction of new buildings on the same site. Another cause is rehabilitation of existing buildings; strong demand for housing can encourage property owners to renovate their buildings to attract higher-income tenants. Single-family houses that are rehabilitated, expanded, or demolished and replaced with larger houses tend to result in more expensive units and do not increase the supply of housing. To evaluate potential impacts on physical displacement, we consider whether the alternatives would change the likelihood of various development outcomes, particularly demolishing existing homes.

## Economic Displacement

Regulatory changes that affect underlying real-estate economics in the study area can change the likelihood of economic displacement. For example, regulations limiting the number of housing units in a particular area can increase competition for homes and put upward pressure on the cost of housing, making it difficult for residents to continue to afford to live there. To evaluate economic displacement, we consider how the alternatives could affect the cost and availability of housing in the study area.

## Cultural Displacement

Cultural displacement occurs when people choose to move because their neighbors and culturally related businesses and institutions have left the area. As described in Chapter 3, people of color, immigrants, and refugees have faced additional barriers to accessing housing in Seattle, particularly in parts of the study area. Challenges to accessing housing due to segregation and discrimination often mirror challenges to accessing other opportunities, such as job and educational opportunities

for these communities. As a result, social networks within racial and ethnic communities may take on a greater importance than for other populations. For communities of color, immigrants, and refugees, social cohesion often plays a larger role in location decisions than it does for other populations. Since cultural anchors, gathering spaces, arts organizations, businesses, and religious institutions may not be widespread elsewhere in the region, the presence of these cultural assets can often have added importance to racial or ethnic minority households in their location decisions.

Measuring cultural displacement is difficult since no systematic survey of households exists that asks why they have chosen to relocate. Some indicators of cultural displacement can be measured at the neighborhood scale. Recall that Exhibit 3-8 shows that some neighborhoods, including Central Area, Beacon Hill, and Columbia City, experienced a substantial decline in the percentage share of racial and ethnic minorities between 1990 and 2010. Because the study area includes only single-family zoning, we do not anticipate direct adverse impacts on cultural institutions, organizations, or businesses, as the proposed Land Use Code changes would not affect those types of land uses. It is possible that policies increasing ADU production could allow more households to create ADUs for rental income or to accommodate changing household sizes and needs, though overall construction costs likely limit this effect.

## 4.1.2 Impacts

### METHODOLOGY

Evaluating the potential housing and socioeconomic effects of the alternatives requires a holistic analysis of development options and housing choices in single-family zones. As described in detail in Appendix A, we used two distinct approaches to analyze the potential effects of the alternatives on housing and socioeconomic conditions in the study area. These two approaches analyze potential effects in different but complementary ways.

The owner of a single-family house in the study area has a number of choices for what to do with it. These choices include whether to sell, rent, or live in the house, as well as whether or not to rebuild, remodel, or add an ADU. The outcome for any given property in any given year depends on the owner's goals, financial resources, and preferences. A hypothetical profit-maximizing developer will seek to maximize return on investment,

but that is not true for all property owners. Homeowners can (and do) make decisions that are unrelated to maximizing the value of their property. The highest and best use of a house might be to tear it down and rebuild a much larger house, but if the homeowner prefers the small house, no change in use would occur until they decide to sell. Building an ADU and renting it out may be most profitable for a homeowner but ruled out because of a preference for privacy or disinterest in becoming a landlord. Even when a property owner does wish to add an ADU or redevelop their site, they may lack the financial capital to do so.

### Highest and Best Use Analysis

To analyze how alternatives might affect underlying development conditions in the study area, we used highest and best use analysis. This analysis considers how the potential Land Use Code changes could alter the highest-value use of a property. In other words, this approach evaluates how the proposed alternatives would affect underlying development economics for lots in Seattle's single-family zones. This analysis identifies the most economically productive use for a particular site, but it does not necessarily predict what will actually happen on a site. This is because it does not consider the motivation and preferences of individual property owners or market demand for a particular real estate product (e.g., an AADU or a single-family house). Thus, highest and best use can tell us how the alternatives could change the underlying real-estate economics in the study area, but it does not predict specific development outcomes for a given parcel or tell us how the alternatives could affect overall development rates in the study area.

Therefore, to arrive at estimates of ADU production for each alternative, we also developed a forecast model that examines where ADU development has occurred in the past and estimates the effect of policy changes in each alternative.

Exhibit 4.1-9 shows how we use the two approaches together to analyze potential housing and socioeconomic effects. Appendix A provides more detail about the methodology used for each analytical approach.

### Highest and Best Use Analysis

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A highest and best use analysis evaluates the reasonable use of a property based on what is physically possible, is financially feasible, and results in the highest present value.

Exhibit 4.1-9 Analytical Approach

Which analysis helps us answer each research question?	Highest and Best Use	Forecast
<b>ADU production.</b> How many ADUs could be created given the proposed policy changes in each alternative?		yes
<b>Development economics.</b> How might the proposed changes alter the underlying real-estate economics in single-family zones? Could the proposed changes make property in single-family zones more attractive as rental investments rather than as owner-occupied assets?	yes	

### Highest and Best Use: Pro Forma Analysis

To analyze the potential impacts of the alternatives on highest and best use in the study area, we used pro forma analysis. Pro forma models are common decision-making tools used by real estate developers and policymakers. Our pro forma model used inputs and assumptions about current market conditions, parcel characteristics, and land use scenarios to calculate a residual land value for more than ~~6,000~~ 8,000 possible development outcomes. By comparing residual land values, we can estimate the highest and best use. Ultimately, the pro forma model allows us to analyze the following questions:

- 1 What can you build on a lot in a single-family zone?
- 2 After it is built, what can you do with it? Sell it? Rent it?
- 3 Based on market conditions, how much rental or sales income can you expect?
- 4 Which combination of steps 1-3 maximizes the profitability of the project?

Although theoretically possible to use pro formas to analyze highest and best use for every parcel in the study area (by applying specific parcel characteristics and more localized rent data), we used instead a typology approach to facilitate interpretation of the results and to highlight some key differentiators related to ADU production. The typology approach — applying three different neighborhood profiles (higher, medium, and lower price) and four different parcel types — allowed us to analyze the relative profitability of various development outcomes on parcels of different sizes and in different parts of the city without analyzing every parcel individually.

### Residual Land Value

Residual land value is a useful metric for comparing the relative feasibility of different development projects. Residual land value is the developer’s land budget for a particular project, after taking into account expected costs (including developer profit) and revenues. A higher residual land value for a particular use indicates that the developer can afford to pay more for the land. Whichever developer has the highest residual land value will outbid the others.

To account for varying market conditions across the study area, we categorized every neighborhood in Seattle as either a higher-, medium-, or lower-price neighborhood. Neighborhoods were classified based on a combination of single-family rental rates and single-family for-sale housing prices. Note that these are comparative labels that simply reflect the relative cost of housing in Seattle neighborhoods. From a broader perspective, housing costs in all Seattle neighborhoods tend to be higher than other places in the county and region, and nationally Seattle's housing market is more expensive than most other U.S. cities. Further, housing costs in neighborhoods categorized here as "lower-price" may in fact be rising faster than elsewhere, over time making housing in those areas increasingly similar to medium- and higher-price neighborhoods. Exhibit 4.1-10 outlines the classifications for neighborhoods in Seattle.

**Exhibit 4.1-10** Neighborhood Profile Classifications

Neighborhood	Sales price category	Rent category	Overall profile
<b>Madison/Leschi</b>	Higher	Higher	Higher
<b>Queen Anne</b>	Higher	Higher	Higher
<b>Capitol Hill/Eastlake</b>	Higher	Higher	Higher
<b>Magnolia</b>	Higher	Medium	Medium
<b>University</b>	Higher	Medium	Medium
<b>Greenlake/Wallingford</b>	Medium	Higher	Medium
<b>Central</b>	Medium	Higher	Medium
<b>Ballard</b>	Medium	Medium	Medium
<b>Beacon Hill</b>	Lower	Medium	Medium
<b>West Seattle</b>	Medium	Lower	Medium
<b>North Seattle</b>	Lower	Lower	Lower
<b>Rainier Valley</b>	Lower	Lower	Lower
<b>White Center</b>	Lower	Lower	Lower

The characteristics of each parcel set upper bounds on what can be built. Some characteristics are permanent (e.g., size and shape of the parcel) while others can change over time (e.g., size and shape of existing structures). To account for varying parcel characteristics, we developed

four parcel types, each defined by lot size, lot shape, and size of current structures. Exhibit 4.1-11 outlines the assumptions for each parcel type.

**Exhibit 4.1-11** Parcel Typology

	Parcel type			
	A	B	C	D
<b>Lot size (square feet)</b>	3,200	3,750	5,000	7,200
<b>Lot width (feet)</b>	32	31	50	60
<b>Lot depth (feet)</b>	100	120	100	120
<b>Footprint of main house (square feet)</b>	940	980	1,050	1,150
<b>Living space in main house (square feet)</b>	1,500	1,600	1,800	1,900
<b>Footprint of accessory structures (square feet)</b>	250	250	250	350
<b>Size of daylight basement (if present) (square feet)</b>	500	600	700	800
<b>Number of parking spaces</b>	2	2	2	2
<b>Implications of assumptions</b>				
<b>Current lot coverage</b>	37%	33%	26%	21%
<b>Maximum <u>DADU</u> footprint <u>available for additional structures (e.g., a DADU) when keeping existing main house (square feet)</u></b>	540	583	700	1,370
<b>Under which alternatives are AADUs allowed?</b>	All alternatives	All alternatives	All alternatives	All alternatives
<b>Under which alternatives are DADUs allowed?</b>	2, 3, <u>Preferred</u>	2, 3, <u>Preferred</u>	All alternatives	All alternatives

Owners of lots in single-family zones have several different options in terms of altering their property. They could tear down an existing structure and rebuild that structure (with or without an ADU). They could keep an existing house and do nothing, remodel, or add an ADU. To evaluate highest and best use in single-family zones, we analyzed the financial performance of 44 legally permissible development outcomes. These outcomes can be categorized into two main types: outcomes that demolish the existing house and outcomes that retain the existing house.

For each development outcome, there are options for what to do with the property — sell it or rent it? A house can be sold, rented to long-term tenants, or used as a short-term rental. Each option is associated with different revenues and costs that determine which use is ultimately most profitable. For a profit-maximizing owner, this decision will be influenced by the relative strengths of the rental and for-sale markets.

To analyze the relative profitability of the rental and for-sale markets in Seattle today, the model considered four valuation options for each development outcome:

- All units (including any ADUs) are valued based on total for-sale price
- All units are used as long-term rentals (including the main house)<sup>1</sup>
- The main house is valued based on its for-sale price, and ADUs are used as long-term rentals
- The main house is valued based on its for-sale price, and one ADU is used as a short-term rental

The pro forma model reflects the current Land Use Code regulations for development in single-family zones, as well as proposed changes under Alternatives 2 and 3 and the Preferred Alternative. Zoning inputs included information about required setbacks, maximum lot and rear yard coverage, required parking spaces, allowed number of ADUs, allowed size of ADUs, and owner-occupancy requirements.

The pro forma model also considered development and operating costs, including the construction costs of building an AADU or a DADU, permitting fees, architectural and engineering fees, developer fees, and any investment returns associated with rental fees. The Final EIS incorporates anticipated DADU cost reductions in all alternatives to reflect possible separate City efforts. Because these efforts are entirely independent of the proposed Land Use Code changes, we apply them across all alternatives.

Finally, we put all the pieces together and modeled each combination of inputs (parcel typology, alternative, neighborhood profile, valuation) for each development outcome. This resulted in residual land value outputs that could be compared across valuation options and alternatives.

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<sup>1</sup> For Alternatives 1 and 3, which would maintain the owner occupancy requirement, this option was used only to evaluate development outcomes that had a main house and no ADUs.

## Forecast Model

Owners in the study area have multiple options for developing their properties. To arrive at a reasonable forecast of what is likely to happen in the future under each alternative, we needed a methodology that accounted for historical rates of ADU production and examined how policy changes could affect them. While the pro forma analysis helped us understand the most profitable outcomes, it did not necessarily reflect the real-world decisions that people make. People build ADUs for several reasons unrelated to profit, including to gain additional living space or to house a family member. Therefore, we developed a forecast model that allows us to analyze past decisions and trends to determine the factors that affect the likelihood that a parcel will add an ADU and to estimate the potential impact of specific policy changes. By adjusting the input variables in the model, we can forecast the potential impacts of Alternatives 2 and 3 and the Preferred Alternative on the number of ADUs built. We also considered how many parcels would have no change, how many homes would be demolished and rebuilt under each alternative, and how these outcomes might vary by neighborhood and parcel size.

To forecast potential ADU production in each alternative, we used the following process:

- 1 Analyze historical data on single-family development outcomes.
- 2 Develop a baseline forecast of 2018-2027 ADU production in Alternative 1 (No Action).
- 3 Develop forecasts of 2018-2027 ADU production in Alternatives 2 and 3 and the Preferred Alternative.
  - » Update variables in baseline forecast model to account for changes to minimum lot size (Alternatives 2 and 3 and the Preferred Alternative) and FAR (Alternative 3 and the Preferred Alternative only).
  - » Evaluate potential number of parcels that would choose to add two ADUs.
  - » Adjust estimates to account for proposed policy changes not reflected in parcel data.

### **1 Analyze historical data on single-family development outcomes.**

First, we used an econometric model to analyze past development events and determine the factors that affect the likelihood that a parcel adds an

ADU or is demolished.<sup>2</sup> We applied this model to all parcels in the study area.

Under current Land Use Code regulations, only owner-occupied properties can add an ADU. This owner-occupancy requirement, which would be removed in Alternative 2 and the Preferred Alternative, restricts the number of properties eligible to add an ADU. To reflect this, we estimated whether each parcel in the study area is owner- or renter-occupied and incorporated that information into the econometric model.

To estimate each parcel's development outcome in a given year, we analyzed King County Assessor's data and City of Seattle permit data for 2010–2017. These sources provided us with parcel characteristics, building characteristics, and information about when properties added ADUs or were redeveloped. We analyzed the effects of the following factors:

- Neighborhood
- Topography
- Square footage of total living space (before and after a teardown, if applicable)
- Age of the home
- Whether the home has a daylight basement
- Number of bedrooms
- Assessed condition of the home
- Whether the lot size allows for a legal DADU
- Total regional employment of the year (PSRC 2015)

The model results indicate that a tradeoff is occurring between adding an ADU and tearing down and rebuilding a house. This suggests that homeowners seeking to expand their living space are deciding between tearing down the home or adding an ADU.

## **2 Develop baseline forecast of ADU production in Alternative 1 (No Action).**

Step 1 above evaluates all parcel-level decisions that occurred from 2010 through 2017. To estimate what decisions will be made over the next 10 years (from 2018 to 2027) under Alternative 1, we must forecast how the underlying variables will change during that period, including changes in

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<sup>2</sup> Specifically, we used a multinomial logit model to estimate ADU production. A multinomial logit model is a type of behavioral econometric model. For more information about the model specifications, see Appendix A

the regional economy and the ages of individual homes. We implement this in the model by updating the variables for age of the home and regional total employment and recalculating parcel-level probabilities.

This results in estimates of the probability that each parcel in the study area will either add an AADU, add a DADU, be torn down, or have no change over the forecast period in Alternative 1.

### **3 Develop forecasts of ADU Production in Alternatives 2 and 3 and the Preferred Alternative.**

Estimating the potential effects of Alternatives 2 and 3 and the Preferred Alternative over 2018-2027 requires further adjustments to the parcel-level variables in the forecast model. Where a proposed policy change modifies a variable in the model, we update that value in the data to reflect the change and recalculate new probabilities for each alternative. Based on the proposed Land Use Code changes under consideration, we manipulate two elements in the behavioral model: 1) minimum lot size requirement for adding a DADU and 2) maximum FAR for new construction. Then we re-run the model with the adjusted inputs to estimate the probability of each development outcome. For Alternative 2 and the Preferred Alternative, we also modify the universe of parcels that are eligible to add an ADU by applying the ADU forecast model to all parcels (including renter-occupied parcels).

However, the forecast model described above cannot predict the probability of events that do not appear in the historical dataset — namely, the construction of two ADUs on one lot. To estimate the number of lots that might have two ADUs under Alternatives 2 and 3 and the Preferred Alternative, we use a different approach that estimates the total demand for ADUs, without constraining parcels to the variations that are currently legal. To do this, we use the same data and variables from the forecast model<sup>3</sup> used for Steps 1 and 2 above but instead apply a count data model. By combining the results of the two models, we estimate the probability that each parcel will add exactly one AADU, add exactly one DADU, add two ADUs, be torn down, or have no change for the 2018-2027 forecast period.

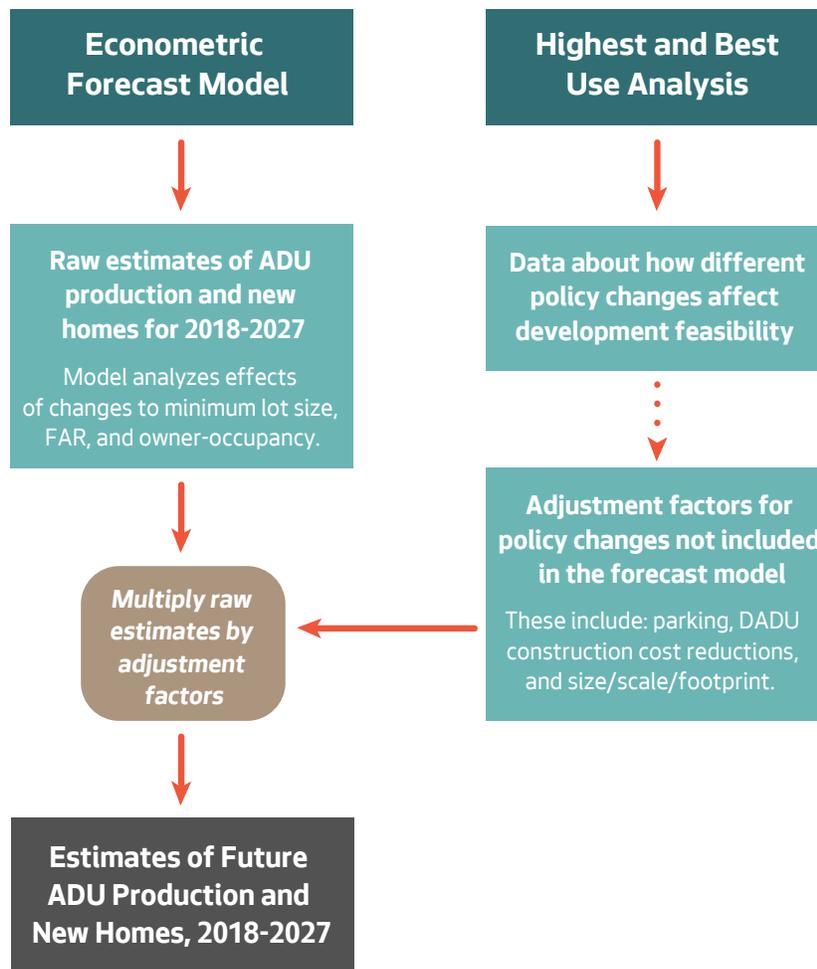
Finally, we adjust the modeled estimates of ADU production to account for the fact that some of the proposed changes in Alternatives 2 and 3 and the Preferred Alternative are not reflected in the available parcel-

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3 For more details about model specification, see Appendix A.

level data. These include changes to ~~owner occupancy~~, maximum household size, parking requirements, maximum DADU size, and DADU construction cost. To the extent that any of these policy proposals affect the likelihood that a parcel has a particular development outcome, those effects are not captured in the forecast model. To compensate for this limitation and to establish a reasonable upper bound for the potential number of ADUs created, we adjust the modeled estimates based on the results from the pro forma analysis. This accounts for the potential impact of policy changes that we cannot model while still using best available information on the potential impact of those policy changes that we can model. Exhibit 4.1-12 shows this process.

**Exhibit 4.1-12** Process for Estimating ADU Production and New Single-Family Development



**New in the FEIS**

Exhibit 4.1-12 is new in the Final EIS.

## MODEL RESULTS

### Pro Forma Results

The sections below summarize the results most pertinent to our analysis of impacts. Appendix A shows the full results of the pro forma analysis.

### Highest and Best Use

Exhibit 4.1-13 presents the estimates of highest and best use for each combination of parcel type, neighborhood profile, and alternative. The highest residential land value for each combination indicates the development outcome where a developer can afford to pay the most for land — in other words, where the combination of costs and revenues yields the greatest profit. In interpreting, it is important to note that these results do not account for the relative feasibility between different outcomes. In some cases, the second-most feasible option may have a residual land value very similar to the most feasible option, which should be taken into consideration when interpreting results. See Appendix A for additional discussion and more detailed results.

**Alternative 1 (No Action).** For smaller parcels (A, B, C) in higher- and medium-price neighborhoods, the highest residual land value would result from demolishing the existing structure and rebuilding the largest possible house (i.e., McMansion). For larger parcels (D), and for all parcel sizes in lower-price neighborhoods, the highest residual land value would result from keeping the existing house and adding an AADU.

**Alternative 2.** Compared to Alternative 1 (No Action), fewer parcel types would have a highest and best use of building a new, very large house. The most feasible outcomes in Alternative 2 would be mostly the same as in Alternative 1 (No Action), with a few exceptions. In higher-price neighborhoods, the highest and best uses for larger parcel sizes (C and D) could shift from demolishing the existing house and rebuilding the largest possible house to keeping the house and adding two ADUs. In addition, the highest and best use of large parcels (D) in medium-price neighborhoods might change from keeping the existing house and adding one ADU to keeping the house and adding two ADUs. In no combination of parcel type and neighborhood is tearing down and rebuilding the most feasible outcome.

A major policy change from Alternative 1 (No Action) to Alternative 2 is that a single lot could have two ADUs. Our analysis indicates that this outcome ~~would be generally more feasible~~ is the most feasible

outcome for nearly all parcel types and neighborhoods, especially on larger parcels in higher- and medium-price neighborhoods. In lower-price neighborhoods, the residual land value of two-ADU outcomes would be about 22 percent less than the most feasible outcome overall is very similar to the residual land value of AADU outcomes.

**Alternative 3.** Compared to Alternative 1 (No Action), fewer parcel types would have a highest and best use of building a new, very large house. Similar to Alternative 2, the most feasible outcome for most parcel types is to retain the existing house and add two ADUs. The exception is small parcels (A) in higher-price neighborhoods, for which the most feasible option remains demolishing the existing house and rebuilding a new, very large house.

**Preferred Alternative.** Compared to Alternative 1 (No Action), fewer parcel types would have a highest and best use of building a new, very large house. The most feasible outcomes are the same as Alternative 2. Consistent with Alternatives 1, 2, and 3, outcomes where an existing house is torn down and rebuilt with one or more ADUs generally have the lowest residual land value. Compared to Alternative 1 (No Action), across all neighborhoods the Preferred Alternative increases the relative feasibility of keeping the house and adding one or more ADUs. This increase is the same as in Alternative 2 and larger than in Alternative 3.

## Valuation Options

For any given development outcome, the property owner could decide to rent or sell the main house and any ADUs on the lot. For a profit-maximizing owner, this decision will be influenced by the relative strengths of the rental and for-sale markets.

**Alternative 1 (No Action).** For all neighborhoods and parcel sizes, a house (with no ADUs) operated as a long-term rental would be the least feasible option. Treating the property's entire floor area (including any ADUs) as one large, for-sale unit would result in the highest residual land value for most scenarios, except for small parcels in lower-price neighborhoods and large parcels in medium-price neighborhoods.

These results indicate that, in current market conditions, single-family houses and ADUs would be generally more valuable on the for-sale market than as rental properties. In other words, valuing an ADU as extra square footage on a house for sale may result in a higher residual land value than valuing the ADU based on its achievable rental income.

**Alternative 2.** Only ~~one~~ two parcel sizes showed a change in the most profitable valuation option between Alternative 1 (No Action) and Alternative 2: Type A and D parcels in medium-price neighborhoods. Treating the entire property (including any ADUs) as one large, for-sale unit would continue to be the most profitable outcome for most scenarios, especially in higher-price neighborhoods. Like Alternative 1 (No Action), renting all units would be the least profitable valuation option for all combinations of neighborhood and parcel size. However, our analysis indicated that the relative feasibility of renting (as opposed to selling) may increase between Alternatives 1 and 2 due to the removal of the owner-occupancy requirement for ADUs. In higher- and medium-price neighborhoods, the estimated residual land value of renting would increase ~~21-24~~ 44-55 percent. In lower-price neighborhoods, the estimated increase would be ~~11-14~~ 26-36 percent.

**Alternative 3.** Like Alternative 2, ~~Only~~ two parcel sizes showed a change in the most profitable valuation option between Alternative 1 (No Action) and Alternative 3: Type A and D parcels in medium-price neighborhoods. Treating the entire property (including any ADUs) as one large, for-sale unit would continue to be the most profitable outcome for most scenarios, especially in higher-price neighborhoods. Like Alternatives 1 and 2, renting all units would be the least profitable valuation option for all combinations of neighborhood and parcel size. The estimated feasibility of renting under Alternative 3 would be similar to Alternative 1 (No Action) and lower than Alternative 2.

**Preferred Alternative.** Like Alternatives 2 and 3, two parcel sizes showed a change in the most profitable valuation option between Alternative 1 (No Action) and the Preferred Alternative: Type A and D parcels in medium-price neighborhoods. Treating the entire property (including any ADUs) as one large, for-sale unit would continue to be the most profitable outcome for most scenarios, especially in higher-price neighborhoods. Like Alternative 1 (No Action), renting all units would be the least profitable valuation option for all combinations of neighborhood and parcel size. However, our analysis indicated that, like Alternative 2, the relative feasibility of renting (as opposed to selling) may increase between Alternative 1 (No Action) and the Preferred Alternative due to the removal of the owner-occupancy requirement.

## Remodel or Teardown and Rebuild?

For any given development outcome, the owner could decide to tear down and rebuild (new construction) or retain the existing house. The pro forma analysis lets us evaluate the relative feasibility of these two options.

**Alternative 1 (No Action).** In all neighborhood profiles, new construction would be relatively more feasible on small- and medium- sized parcels than on large parcels. In addition, new construction would be more feasible in higher- and medium-price neighborhoods than in lower-price neighborhoods.

**Alternative 2.** For ~~higher- and medium-price~~ all neighborhoods, Alternative 2 could increase the relative feasibility of keeping the existing house compared to Alternative 1 (No Action). This change would be greatest for larger parcels. Lower-price neighborhoods would see ~~only a~~ minimal smaller (<0.2 ≤5 percent) change in the feasibility of keeping the existing house between Alternative 1 (No Action) and Alternative 2.

**Alternative 3.** Like Alternative 2, Alternative 3 could increase the relative feasibility of keeping the existing house compared to Alternative 1 (No Action). This change would be greatest for larger parcels in higher- and medium-price neighborhoods. Lower-price neighborhoods would see a ~~minimal~~ smaller change in the feasibility of teardowns between Alternative 1 (No Action) and Alternative 3.

**Preferred Alternative.** Like Alternatives 2 and 3, the Preferred Alternative would increase the feasibility compared to Alternative 1 (No Action) of preserving the existing house rather than tearing it down and rebuilding a large new house. This change would be greatest for larger parcels. Lower-price neighborhoods would see only a minimal change in the feasibility of teardowns between Alternative 1 (No Action) and the Preferred Alternative.

Estimates of Highest and Best Use

Parcel type	Alternative	Neighborhood price		
		Higher	Medium	Lower
A	Alternative 1	Build new house, as large as possible, no ADUs	Build new house, as large as possible, no ADUs	Keep house, convert basement to AADU, long-term rental
	Alternative 2	Build new house, as large as possible, no ADUs	Build new house, as large as possible, no ADUs	Keep house, convert basement to AADU, long-term rental
	Alternative 3	Build new house, as large as possible, no ADUs	Build new house, as large as possible, no ADUs	Keep house, convert basement to AADU, long-term rental
B	Alternative 1	Build new house, as large as possible, no ADUs	Build new house, as large as possible, no ADUs	Keep house, convert basement to AADU, long-term rental
	Alternative 2	Build new house, as large as possible, no ADUs	Build new house, as large as possible, no ADUs	Keep house, convert basement to AADU, long-term rental
	Alternative 3	Build new house, as large as possible, no ADUs	Build new house, as large as possible, no ADUs	Keep house, convert basement to AADU, long-term rental
C	Alternative 1	Build new house, as large as possible, no ADUs	Build new house, as large as possible, no ADUs	Keep house, convert basement to AADU
	Alternative 2	Keep house, convert basement to AADU, and add DADU	Build new house, as large as possible, no ADUs	Keep house, convert basement to AADU
	Alternative 3	Keep house, convert basement to AADU and add DADU	Keep house, convert basement to AADU and add DADU	Keep house, convert basement to AADU
D	Alternative 1	Keep house, convert basement to AADU	Keep house, convert basement to AADU, long-term rental	Keep house, convert basement to AADU
	Alternative 2	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU
	Alternative 3	Keep house, convert basement to AADU and add DADU	Keep house, convert basement to AADU and add DADU	Keep house, convert basement to AADU

 Highest residual land value results from valuing the parcel based on the combined for-sale price of the main house and ADU(s);  
 Highest residual land value results from valuing the parcel based on the for-sale price of the house and long-term rental income from the ADU.

Exhibit 4.1-13 Estimates of Highest and Best Use

Parcel type	Alternative	Neighborhood price		
		Higher	Medium	Lower
A	<b>Alt 1 (No Action)</b>	Build new house, as large as possible, no ADUs	Build new house, as large as possible, no ADUs	Keep house, convert basement to AADU, long-term rental
	<b>Alt 2</b>	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, add DADU, long-term rental	Keep house, convert basement to AADU, add DADU, long-term rental
	<b>Alt 3</b>	Build new house, as large as possible, no ADUs	Keep house, convert basement to AADU, add DADU, long-term rental	Keep house, convert basement to AADU, add DADU, long-term rental
	<b>Preferred Alternative</b>	Build new house, as large as possible, no ADUs	Keep house, convert basement to AADU, add DADU, long-term rental	Keep house, convert basement to AADU, add DADU, long-term rental
B	<b>Alt 1 (No Action)</b>	Build new house, as large as possible, no ADUs	Build new house, as large as possible, no ADUs	Keep house, convert basement to AADU, long-term rental
	<b>Alt 2</b>	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, add DADU, long-term rental
	<b>Alt 3</b>	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, long-term rental
	<b>Preferred Alternative</b>	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, long-term rental
C	<b>Alt 1 (No Action)</b>	Build new house, as large as possible, no ADUs	Build new house, as large as possible, no ADUs	Keep house, convert basement to AADU
	<b>Alt 2</b>	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU
	<b>Alt 3</b>	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU
	<b>Preferred Alternative</b>	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU
D	<b>Alt 1 (No Action)</b>	Keep house, convert basement to AADU	Keep house, convert basement to AADU, long-term rental	Keep house, convert basement to AADU
	<b>Alt 2</b>	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU
	<b>Alt 3</b>	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU
	<b>Preferred Alternative</b>	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU	Keep house, convert basement to AADU, and add DADU

Highest residual land value results from valuing the parcel based on the for-sale price of the house and long-term rental income from the ADU.  
 Highest residual land value results from valuing the parcel based on the combined for-sale price of the main house and ADU(s).

### Forecast of ADU Production

Using the methods described above, we arrive at estimates of ADU production and single-family new construction for 2018-2027. As noted, the forecast model cannot account for all proposed policy changes. To account for those un-modeled policy changes and arrive at a reasonable upper-bounds estimate of ADU production, we apply the percentage increases shown in Exhibit 4.1-14 as adjustment factors to the modeled estimates as adjustment factors. In response to comments received on the Draft EIS, we increased the adjustment factors overall, and we present the specific adjustment factors for each unmodeled policy change in Exhibit A-46 of Appendix A.

**Exhibit 4.1-14** Total Assumed Percentage Increases in Modeled Number of Events due to Policy Changes Not Accounted for in Model

	<u>Alternative 1 (No Action)</u>	<u>Alternative 2</u>	<u>Alternative 3</u>	<u>Preferred Alternative</u>
<b>One AADU</b>	<u>0%</u>	<u>5% 10%</u>	<u>2% 10%</u>	<u>10%</u>
<b>One DADU</b>	<u>20%</u>	<u>15% 33%</u>	<u>10% 33%</u>	<u>39%</u>
<b>Two ADUs</b>	<u>n/a</u>	<u>30% 58%</u>	<u>25% 45%</u>	<u>64%</u>
<b>Teardown</b>	<u>0%</u>	<u>0%</u>	<u>0%</u>	<u>0%</u>

We chose these adjustment factors based on review of the highest and best use analysis results. Appendix A provides more detail about the rationale for each adjustment. In general, we chose higher adjustments than indicated by the results of the highest and best use analysis alone in order to arrive at a reasonable upper-bounds estimate for ADU production.

Below we summarize the results most pertinent to the impacts analysis. Appendix A presents the full results of the forecast modeling. The results presented in Exhibit 4.1-15 indicate that both Alternatives 2 and 3 all action alternatives would increase the production of ADUs citywide. The results show that about ~~1,890~~ 1,970 ADUs would be created under Alternative 1 (No Action) between 2018 and 2027. In comparison, we estimate that Alternative 2 would result in about ~~3,330~~ 4,280 ADUs over the same 10-year period, and Alternative 3 would result in about ~~3,100~~

3,400 ADUs, and the Preferred Alternative would result in about 4,430 ADUs.

We also find that ~~both~~ Alternatives 2 and 3 and the Preferred Alternative are likely to reduce the number of teardowns. These results reflected the finding from the production model that, historically, households in Seattle have traded off between adding ADUs and demolishing and rebuilding. The model predicted that allowing DADUs on smaller lots (as proposed in Alternative 2 and 3 and the Preferred Alternative) would increase ADU production on those lots and, at the same time, decrease teardowns. ~~Alternative 3~~ The Preferred Alternative would have the largest potential reduction in teardowns, with an estimated ~~16~~ 22-percent decrease compared to Alternative 1 (No Action). The larger reduction in teardowns under ~~Alternative 3~~ the Preferred Alternative would be due to the proposed FAR limit for new construction.

**Exhibit 4.1-15** Estimated Production of ADUs and New Homes, 2018-2027, by Neighborhood Profile

	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative	Percentage change from Alternative 1		
	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative	Alternative 2	Alternative 3	Preferred Alternative
<b>Estimated number of ADUs built</b>							
<b>Higher</b>	235 220	460 560	400 450	580	96% 155%	70% 105%	164%
<b>Medium</b>	1,020 1,000	1,880 2,360	1,750 1,870	2,450	84% 136%	72% 87%	145%
<b>Lower</b>	635 650	990 1,260	950 980	1,300	56% 94%	50% 51%	100%
<b>Estimated number of parcels that build at least one ADU</b>							
<b>Higher</b>	235 220	330 470	320 380	490	40% 114%	36% 73%	123%
<b>Medium</b>	1,020 1,000	1,365 2,010	1,310 1,580	2,080	34% 101%	28% 58%	108%
<b>Lower</b>	635 650	755 1,110	725 860	1,140	19% 71%	14% 32%	75%
<b>Percent of study area parcels that build at least one ADU</b>							
<b>Higher</b>	1.9% 2.0%	2.7% 4.3%	2.6% 3.4%	4.4%	40% 114%	36% 73%	123%
<b>Medium</b>	1.6% 1.7%	2.1% 3.4%	2.0% 2.6%	3.5%	34% 101%	28% 58%	108%
<b>Lower</b>	1.4% 1.6%	1.7% 2.7%	1.6% 2.1%	2.8%	19% 71%	14% 32%	75%
<b>Percent of study area parcels with teardowns</b>							
<b>Higher</b>	2.9% 2.5%	2.7% 2.1%	2.6% 1.6%	1.5%	-9% -15%	-31% -35%	-38%
<b>Medium</b>	2.2% 1.9%	2.1% 1.6%	2.0% 1.5%	1.4%	-7% -14%	-18% -20%	-25%
<b>Lower</b>	1.8% 1.5%	1.7% 1.5%	1.6% 1.4%	1.4%	-2% -6%	-6% -7%	-11%

Note Estimates have been rounded to the nearest 10.

Exhibit 4.1-15 presents the results of the forecast model broken out by neighborhood profile (higher-, medium-, or lower-price). Under Alternative 1 (No Action), baseline rates of ADU production and new construction would be highest in higher-price neighborhoods (where ~~1.9~~ 2.0 percent of lots would add an ADU and ~~2.9~~ 2.5 percent of lots would experience a teardown) compared to ADU production in lower-price neighborhoods (~~1.4~~ 1.6 percent and ~~1.8~~ 1.5 percent, respectively). Medium-price neighborhoods would fall in the middle.

This analysis also indicates that, in ~~Alternatives 2 and 3~~ all action alternatives, higher-price neighborhoods would see the largest potential changes in ADU production, followed by medium-price neighborhoods. Lower-price neighborhoods would see the smallest potential changes in ADU production under ~~either~~ any action alternative. Alternative 2 would ~~nearly more than~~ double the number of ADUs produced in higher-price neighborhoods, a ~~96~~ 155-percent increase relative to Alternative 1 (No Action), while lower-price neighborhoods would experience a ~~more modest~~ smaller but still substantial increase in the number of ADUs (56 94 percent).

Likewise, the effect of the FAR limit proposed in Alternative 3 and the Preferred Alternative, which would limit the size of new houses and disincentivize teardowns, would also be greatest in higher-price neighborhoods. In Alternative 3, the estimated number of teardowns in higher-price neighborhoods would decrease ~~34~~ 35 percent relative to Alternative 1 (No Action), but only ~~six~~ seven percent in lower-price neighborhoods.

Similar to Alternatives 2 and 3, the potential effects of the Preferred Alternative on ADU production and new construction would be greatest in higher-price neighborhoods. We estimate that the number of ADUs in higher-price neighborhoods would increase 164 percent compared to Alternative 1 (No Action). Likewise 38 percent fewer single-family houses would be demolished in higher-price neighborhoods under the Preferred Alternative.

## IMPACTS ANALYSIS

This section discusses potential impacts of each alternative on housing affordability and displacement.

To evaluate impacts on affordability, we consider the estimated number of ADUs produced between 2018 and 2027 based on our production model. Currently, the number of housing units in Seattle's single-family

zones is relatively stable. This is a result of having few development opportunities in areas that are already built out. People who want to live in these areas have limited options, in terms of both diversity of housing products available and the number of vacant or for-sale units. Expanding the supply of housing in these neighborhoods can reduce the upward bidding pressure for housing that results from product scarcity. Generally, increasing housing supply helps drive up vacancy rates and moderate increases in housing prices. We expect that greater ADU production has a positive effect on affordability by increasing the overall housing supply, and specifically the number of rental housing options available in single-family zones. More availability of rental housing options has a moderating effect on housing price increases.

Changes to size or characteristics of homes can also affect housing affordability in the study area. Larger units tend to be more expensive. Increasing the number of ADUs has the effect of providing smaller, less expensive units in single-family areas. The maximum size of an ADU is 1,000 square feet, compared to the historical average of 1,900 square feet for a detached house in a single-family zone or 3,130 square feet for a typical new detached house.<sup>4</sup> Since teardowns result in new houses, which tend to be large and expensive, higher estimates of teardowns also likely have an adverse impact on affordability.

Decreasing housing costs is the most commonly discussed method of increasing housing affordability, but increasing income can achieve the same effect. For example, a household with an income of \$100,000 can afford to pay more for housing than a household with an income of \$50,000. An ADU operated as a rental unit may provide a revenue stream that might help people stay in their homes. As of fall 2017, median rent for ADUs listed on Craigslist was \$1,400 per month, which might increase a homeowner's annual income by more than \$11,000 after accounting for operating expenses. Policies that make it easier or less expensive to build ADUs may also marginally improve affordability for homeowners by providing new income sources, though this may disproportionately benefit those homeowners who have access to credit or other resources available to finance the construction of ADUs.

To evaluate impacts on displacement, we examine the estimated number of homes that would be torn down and the number of expected number ADUs that would be produced under each under each alternative. While

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<sup>4</sup> 3,130 square feet is the median total square footage of single-family houses built 2016-2017 in the study area.

not every teardown means a household was physically displaced — an owner that voluntarily sells their property to capture an increase in value is a different outcome than a renter household forced to move due to rehabilitation or redevelopment — in general we expect more teardowns to indicate a higher likelihood of physical displacement. While economic displacement is more difficult to measure precisely, we expect that, by increasing rental housing options in the study, greater ADU production has a moderating effect on housing prices and thus has a positive effect on economic displacement. We also expect that, in general, greater ADU production could indicate that more households are able to benefit from a new revenue stream that provide stability. However, absent other actions to reduce costs, in all alternatives the overall cost of construction likely limits ADU development to relatively higher-income owners.

Under all alternatives, housing affordability and displacement in the study area would continue to be a concern. Ultimately, housing demand generated by Seattle's strong job market and attractive natural and cultural amenities would continue to lead to competition for a finite number of single-family homes. Seattle's limited land area would also likely continue to contribute to upward pressure on housing costs. Low vacancy rates and tight rental housing inventory would continue to contribute to high rents, especially when demand is fueled by a high-wage workforce.

### **Impacts of Alternative 1 (No Action)**

Under Alternative 1 (No Action), current Land Use Code regulations for development in single-family zones would remain unchanged. We anticipate current trends in ADU production would generally continue. Based on our forecast model, we estimate ~~1,890~~ 1,970 ADUs would be created between 2018 and 2027. Compared to Alternatives 2 and 3 and

the Preferred Alternative, Alternative 1 (No Action) would result in more teardowns, more lots with large new houses, and fewer ADUs overall. The creation of fewer ADUs under Alternative 1 (No Action) compared to ~~both~~ all three action alternatives would result in fewer housing options available in the study area and thus put greater upward pressure on housing prices. The larger number of teardowns under Alternative 1 compared to ~~both~~ the action alternatives also suggests an increased number of larger, more expensive houses.

## Impacts of Alternative 2

### Affordability

Under Alternative 2, we estimate ~~3,330~~ 4,280 ADUs would be created between 2018 and ~~2017~~ 2027. Compared to Alternative 1 (No Action), the creation of about ~~1,440~~ 2,310 more ADUs in Alternative 2 relative would likely have a slight positive impact on housing affordability. While the affordability of housing would remain a concern and a burden for many Seattle residents, Alternative 2 would increase the number of housing choices available in the study area compared to Alternative 1 (No Action). Although not every new ADU would be renter-occupied (some would be used by the homeowner for additional space), Alternative 2 would likely increase housing supply relative to Alternative 1 (No Action). This would have a positive impact on affordability because the additional housing supply could marginally reduce upward pressure on rents and housing prices.

The forecast model also estimates that Alternative 2 would reduce the number of teardowns by about ~~six~~ 11 percent relative to Alternative 1. The reduced number of teardowns would likely have a positive impact on housing affordability (because new houses tend to be larger and more expensive than the homes they replace).

Both the pro forma analysis and the production model find that ADU production rates would likely vary by neighborhood profile, with higher rates of ADU production in more expensive neighborhoods. Further, in higher-price areas where housing is unaffordable to a large share of Seattle residents, Alternative 2 would result in ~~the largest~~ a relative increase of 155 percent in ADU production over Alternative 1 (No Action). As shown in Exhibit 4.1-16, many higher-price neighborhoods are places that offer greater access to opportunity, a measure used in the Seattle 2035 Comprehensive Plan to identify factors that people and communities need to flourish.

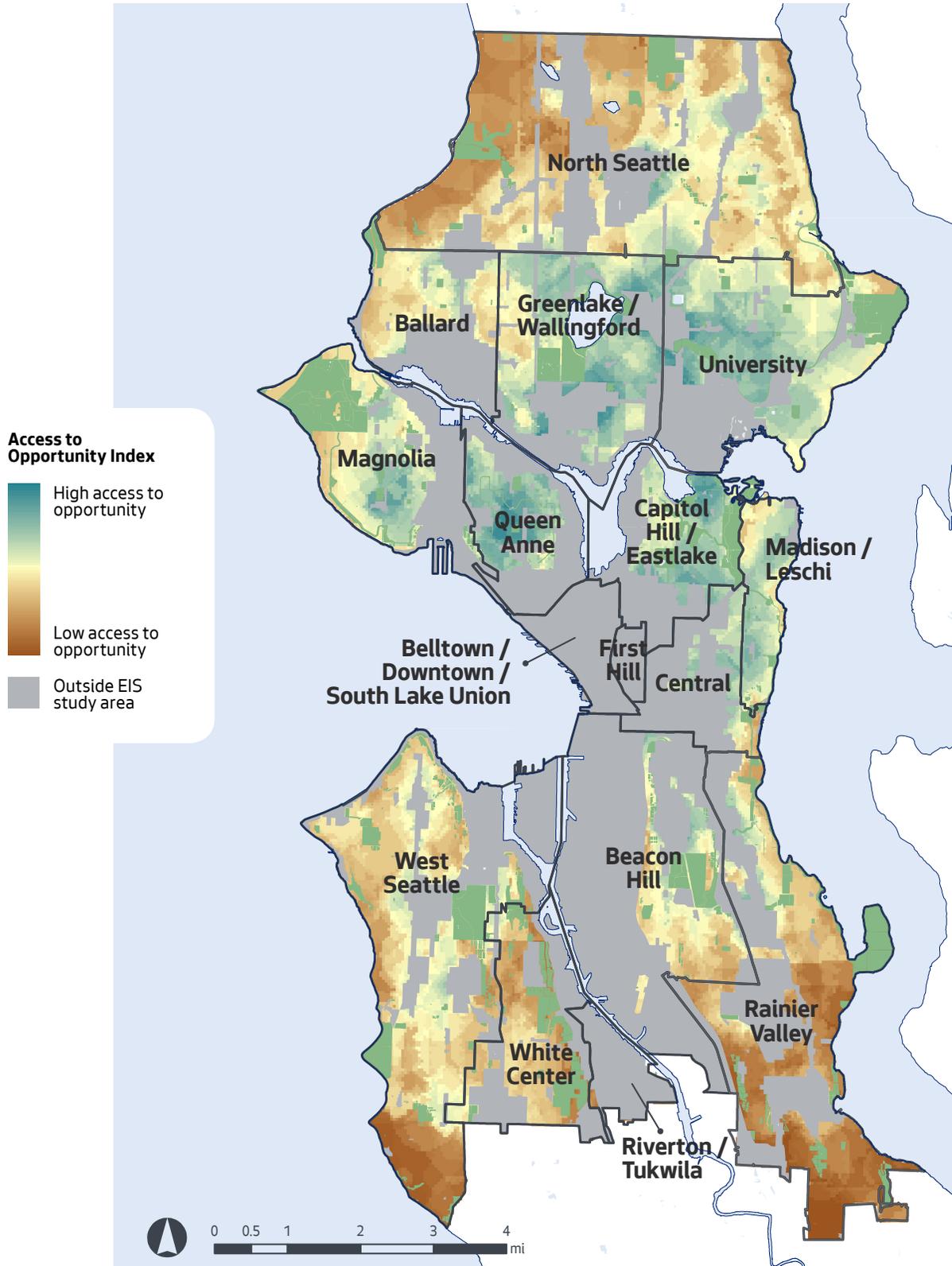
### Access to Opportunity Index

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The 2016 Seattle Growth and Equity Analysis evaluated disparities in the benefits and burdens that marginalized populations like people of color and low-income households tend to experience as a result of growth. The Access to Opportunity Index reflects data on employment, education, and proximity to services, transit, and community resources (Seattle 2016).

**Exhibit 4.1-16** Seattle 2035 Access to Opportunity Index

Source: Seattle 2016



A final way of looking at potential effects on the price of housing is to consider estimated changes to the maximum residual land value under each alternative. An increase in the residual land value suggests that developers could afford to pay more for land, and thus that land prices might potentially increase, leading to an eventual increase in housing prices. As shown in Exhibit 4.1-17, the estimated changes in residual land value would vary by lot type and neighborhood cost. ~~In all three neighborhood types (higher-, medium-, and lower-price), residual land value would remain relatively consistent between Alternatives 1 and 2. Some lot types in medium- and higher-price neighborhoods would experience minor increases in residual land value, but in lower-price neighborhoods residual land value would remain consistent between Alternatives 1 and 2. In higher- and medium-price neighborhoods, the amount a developer could afford to pay for land increases for parcel types C and D, suggesting that land prices in those cases could potentially increase. Smaller parcel types (A and B) in higher- and medium-price neighborhoods show minimal changes in residual land value across the four alternatives. In lower-price neighborhoods, the amount a developer could afford to pay shows only small changes across the four alternatives, suggesting minimal change in land values.~~ This indicates that, overall, land prices are unlikely to change substantially for most parcel types.

However, changes to residual land value do not directly impact property values or property tax bills, for several reasons. We use residual land value to better understand the underlying economics of the ADU policies contemplated in this EIS. Changes in property value will appear only to the extent that the potential for ADU creation results in increased sales prices, which is determined by ADU production rates and individual homebuyer and investor decision-making. It is not possible to use the residual land value analysis to directly forecast changes in land prices, and that overall housing prices and rents would not be expected to increase in Alternative 2.

**Exhibit 4.1-17** Estimated Changes to Maximum Residual Land Value

	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
<b>Higher</b>				
<b>A</b>	\$299	\$299	\$299	<u>\$299</u>
<b>B</b>	\$291	<del>\$291</del> <u>\$298</u>	<del>\$277</del> <u>\$294</u>	<u>\$298</u>
<b>C</b>	\$218	<del>\$227</del> <u>\$253</u>	<del>\$223</del> <u>\$250</u>	<u>\$253</u>
<b>D</b>	\$151	<del>\$169</del> <u>\$187</u>	<del>\$166</del> <u>\$184</u>	<u>\$187</u>
<b>Medium</b>				
<b>A</b>	\$225	<del>\$225</del> <u>\$232</u>	<del>\$225</del> <u>\$228</u>	<u>\$232</u>
<b>B</b>	\$219	<del>\$219</del> <u>\$221</u>	<del>\$209</del> <u>\$217</u>	<u>\$221</u>
<b>C</b>	\$164	<del>\$164</del> <u>\$189</u>	<del>\$159</del> <u>\$185</u>	<u>\$189</u>
<b>D</b>	<del>\$115</del> <u>\$116</u>	<del>\$122</del> <u>\$139</u>	<del>\$119</del> <u>\$137</u>	<u>\$139</u>
<b>Lower</b>				
<b>A</b>	\$162	<del>\$162</del> <u>\$170</u>	<del>\$162</del> <u>\$165</u>	<u>\$170</u>
<b>B</b>	<del>\$148</del> <u>\$149</u>	\$149	<del>\$148</del> <u>\$149</u>	<u>\$149</u>
<b>C</b>	<del>\$122</del> <u>\$123</u>	<del>\$123</del> <u>\$128</u>	<del>\$122</del> <u>\$124</u>	<u>\$128</u>
<b>D</b>	\$91	<del>\$91</del> <u>\$95</u>	<del>\$91</del> <u>\$92</u>	\$95

In summary, Alternative 2 would result in more ADUs than Alternative 1 (No Action), increasing the supply of rental housing in the study area, especially in neighborhoods with high access to opportunity. ADUs tend to be smaller than the average detached single-family house. Residual land value would remain relatively consistent for parcel types A and B and for all parcel types in lower-price neighborhoods between Alternative 1 (No Action) and Alternative 2, ~~including specifically in lower-price neighborhoods~~, suggesting land prices are not likely to increase substantially due to changes in development feasibility. Additional ADUs could provide new income sources for some homeowners. The number of teardowns would decrease relative to Alternative 1 (which improves affordability because new homes tend to be more expensive than the homes they replace). Therefore, we do not anticipate adverse impacts on affordability under Alternative 2.

## Displacement

Physical and economic displacement can occur anywhere. However, certain populations or communities can be at greater risk of displacement or face greater barriers to finding housing. The Displacement Risk Index is one way the City has evaluated the displacement pressures that marginalized populations experience (see sidebar). As shown in Exhibit 4.1-18, the neighborhoods in the study area with marginalized populations most vulnerable to displacement are Rainier Valley, White Center, Beacon Hill, and North Seattle. Except for Beacon Hill, these are all lower-price neighborhoods. All four neighborhoods also have relatively larger shares of people of color (Exhibit 4.1-19).

Physical displacement impacts could occur if policy changes increase the feasibility of demolishing an existing house relative to other development outcomes, especially in areas at higher risk of displacement. The highest and best use analysis shows that fewer teardowns would occur in all neighborhood types in Alternative 2 compared to Alternative 1 (No Action). We expect the overall number of teardowns to decrease from ~~2,610~~ 2,030 under Alternative 1 (No Action) to ~~2,460~~ 1,800 under Alternative 2, including fewer teardowns specifically in lower-price neighborhoods, where displacement risk could be higher. Because fewer teardowns would occur under Alternative 2 compared to Alternative 1 (No Action), we do not anticipate adverse impacts on physical displacement.

Some people may be concerned that an overall increase in development feasibility could have an adverse impact on economic or cultural displacement by accelerating redevelopment generally, even if the resulting increase in rental housing supply has a positive impact on affordability. This could be a concern specifically for neighborhoods at greater risk of displacement or neighborhoods where current housing prices are relatively lower. Our analysis shows that, in Alternative 2, lower-price neighborhoods are likely to experience smaller changes in development feasibility across all lot sizes than medium- or higher-price neighborhoods. Likewise, the change in redevelopment rates (measured as teardowns or ADU construction) between Alternative 1 (No Action) and Alternative 2 would be smaller in lower-price neighborhoods than in medium- and higher-price neighborhoods. Specifically, the highest and best use analysis finds that property owners in lower-price neighborhoods would tend to keep the main house and add an ADU for rental purposes. Therefore, because changes in development feasibility would be smallest in lower-price neighborhoods, Alternative 2 would not be likely to have adverse impacts on economic displacement. Further, the additional ADUs occurring in Alternative 2 in lower-price neighborhoods would create new housing options and could alleviate some economic displacement impacts compared to Alternative 1 (No Action).

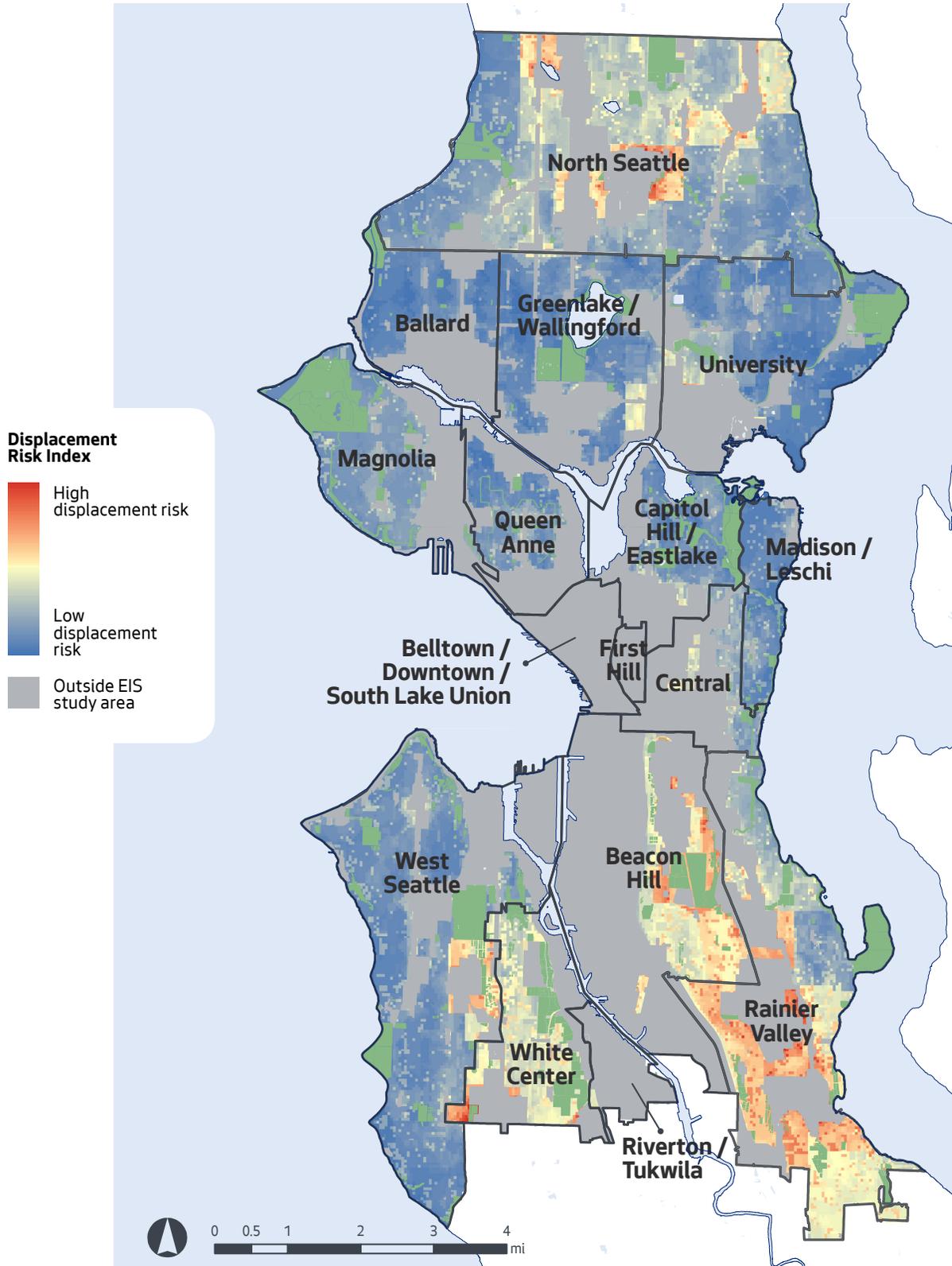
## Displacement Risk Index

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The 2016 Seattle Growth and Equity Analysis also evaluated the risk of displacement that marginalized populations face. The Displacement Risk Index combines data about demographic factors, like the share of an area's population who are people of color or have low incomes, with physical factors that can precipitate or contribute to displacement pressure, like proximity to frequent transit, services, and job opportunities (Seattle 2016).

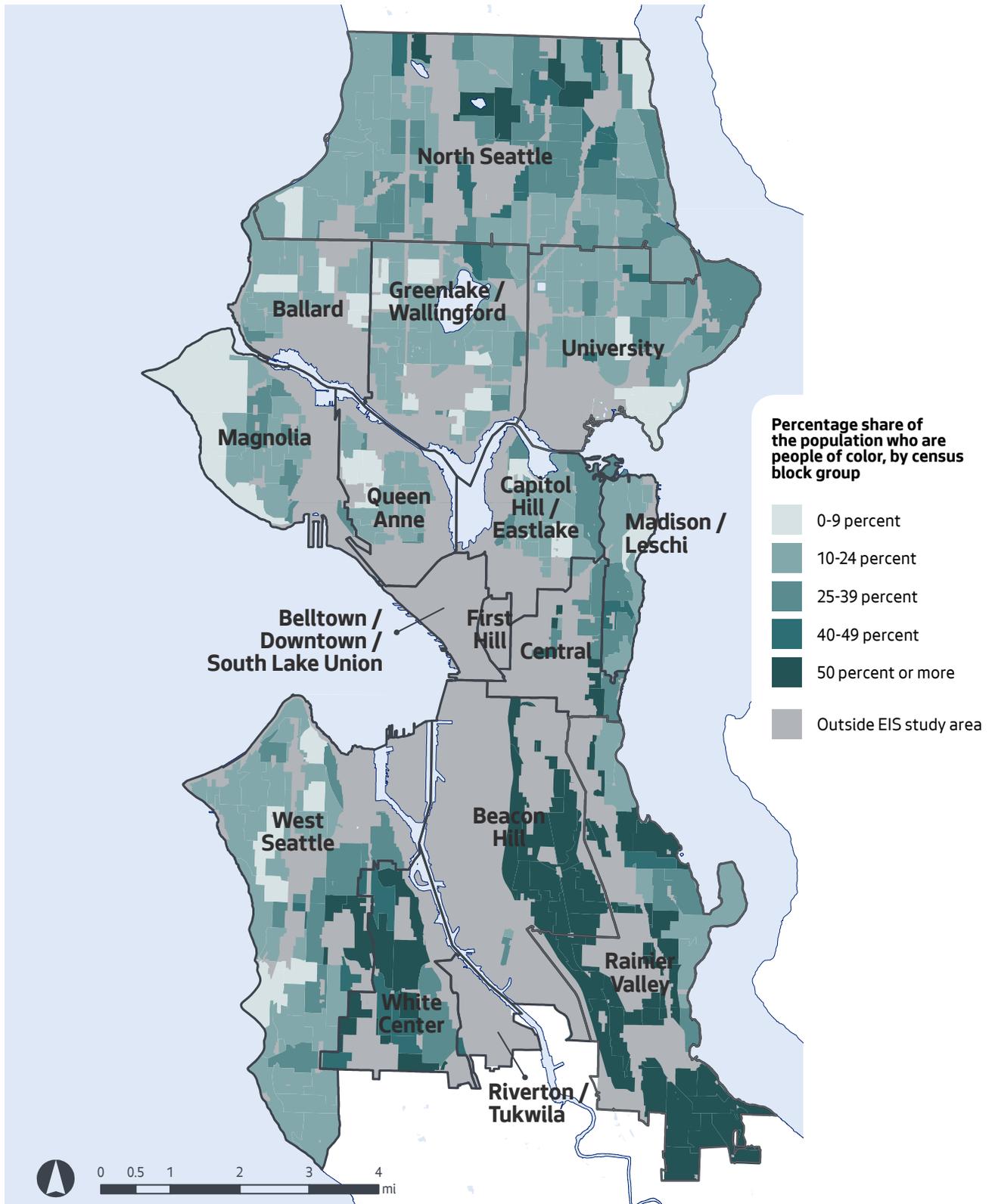
**Exhibit 4.1-18** Seattle 2035 Displacement Risk Index

Source: Seattle 2016



**Exhibit 4.1-19** Share of Residents Who Are People of Color

Source: 2016 5-Year American Community Survey



## Impacts of Alternative 3

### Affordability

We expect ~~3,100~~ 3,400 ADUs would be created between 2018 and 2027 under Alternative 3, ~~less fewer~~ than Alternative 2 (~~3,330~~ 4,280) and the Preferred Alternative (4,430) but more than Alternative 1 (No Action) (~~1,890~~ 1,970). Therefore, under Alternative 3, the positive impacts on affordability due to increased rental housing supply would be similar to, but marginally smaller than, Alternative 2. The addition of about ~~1,210~~ 1,430 more ADUs compared to Alternative 1 (No Action) would have a positive impact on housing affordability, though not as much as the ~~1,440~~ 2,310 additional ADUs estimated under Alternative 2 or 2,460 additional ADUs under the Preferred Alternative. The creation of additional housing options would likely moderate increases in housing prices. In addition, ADUs operated as rentals could provide a new income stream, making housing somewhat more affordable for owners. Overall, we do not expect adverse impacts on affordability under Alternative 3.

Alternative 3 would include ~~MHA requirements~~ incentives for affordable housing when a property owner adds a second ADU. Of the ~~3,100~~ 3,400 ADUs created under Alternative 3 between 2018 and 2027, we estimate approximately ~~745~~ 480 would occur on parcels with two ADUs, as shown in Exhibit 4.1-12. Based on an average ADU size of 500-800 square feet and an MHA affordability incentive payment requirement of \$13 per gross square feet, we estimate that ADU production under Alternative 3 would generate ~~\$20-30 million~~ \$3.1-5.0 million in affordable housing contributions over the 10-year period. The added cost of the ~~MHA requirement~~ the incentive for affordable housing would also marginally decrease the number of parcels adding a second ADU compared to a scenario without ~~MHA requirements~~ affordable housing incentives, thereby somewhat reducing the supply of rental housing, an adverse impact on affordability.

### Displacement

Under Alternative 3, the beneficial impacts to displacement would be similar to Alternative 2 and the Preferred Alternative. We expect Alternative 3 would result in fewer teardowns (~~2,200~~ 1,670) than both Alternative 1 (No Action) (2,610) and Alternative 2 (2,460) and slightly more than the Preferred Alternative (1,580). This would reduce the potential for physical displacement impacts even more than Alternative 2. We expect Alternative 3 would alleviate ongoing economic displacement

compared to Alternative 1 (No Action), but somewhat less than Alternative 2 since slightly fewer ADUs, and therefore fewer new rental housing options, would be created under Alternative 3 than in Alternative 2.

## **Impacts of the Preferred Alternative**

### **Affordability**

We expect 4,430 ADUs would be created between 2018 and 2027 under the Preferred Alternative. This would be more than Alternative 1 (No Action) (1,970), Alternative 2 (4,280), and Alternative 3 (3,400). Therefore, we expect the Preferred Alternative would have the greatest positive impacts on affordability resulting from increased rental housing supply — about 2,460 more ADUs compared to Alternative 1 (No Action) — among the four alternatives evaluated in this Final EIS. Compared to Alternative 1 (No Action), the Preferred Alternative would result in about 2,460 more ADUs, a larger increase than under either Alternative 2 or 3. The creation of additional housing options would likely moderate increases in housing prices. In addition, ADUs operated as rentals could provide an income stream, making housing somewhat more affordable for owners. Overall, we do not expect adverse impacts on affordability under the Preferred Alternative.

### **Displacement**

Under the Preferred Alternative, the beneficial impacts on displacement would be similar to Alternatives 2 and 3. We expect the Preferred Alternative would result in the fewest teardowns (1,580) of the analyzed alternatives, 22 percent fewer than under Alternative 1 (No Action). This would reduce the potential for physical displacement impacts even more than Alternatives 2 and 3. We expect the Preferred Alternative would have the greatest potential to alleviate ongoing economic displacement compared to the other alternatives analyzed because it yields the largest number of ADUs and the greatest reduction in teardowns.

## **4.1.3 Mitigation Measures**

Based on the results of this analysis, the proposed Land Use Code changes would have marginal benefits on housing affordability and would not increase displacement impacts. Therefore, no mitigation measures are proposed.

## 4.1.4 Significant Unavoidable Adverse Impacts

Based on the results of this analysis, the proposed Land Use Code changes would have marginal benefits on housing affordability and would not increase displacement impacts. No significant unavoidable adverse impacts are anticipated to housing or socioeconomics from the proposed Land Use Code changes.

## 4.2 Land Use

This land use analysis reviews potential impacts on land use patterns and development in Seattle's single-family residential zones. This section analyzes increased residential and population density and whether the action alternatives would result in a fundamental change to land use form. We also review potential impacts on tree canopy, shorelines, and Environmentally Critical Areas (ECAs), open space, and historic resources.

### 4.2.1 Affected Environment

The following sections describe current and future land use for single-family residential areas as envisioned in the Seattle 2035 Comprehensive Plan (Comprehensive Plan) (Seattle 2017a). This section draws from independent analysis as well as information from the Comprehensive Plan and the Mandatory Housing Affordability (MHA) Final EIS (Seattle 2017b). The visual impacts of general development standards (e.g., height limits and setbacks) are discussed in Section 4.3, Aesthetics. Off-street parking standards are discussed in Section 4.5, Parking and Transportation.

#### SEATTLE 2035 COMPREHENSIVE PLAN

The Comprehensive Plan describes Seattle's existing and future land use and policies. In 2016, the City completed a major update to its Comprehensive Plan, adopting a new 20-year plan to guide growth through the year 2035 (Seattle 2017a). Seattle's Comprehensive Plan has four core values:

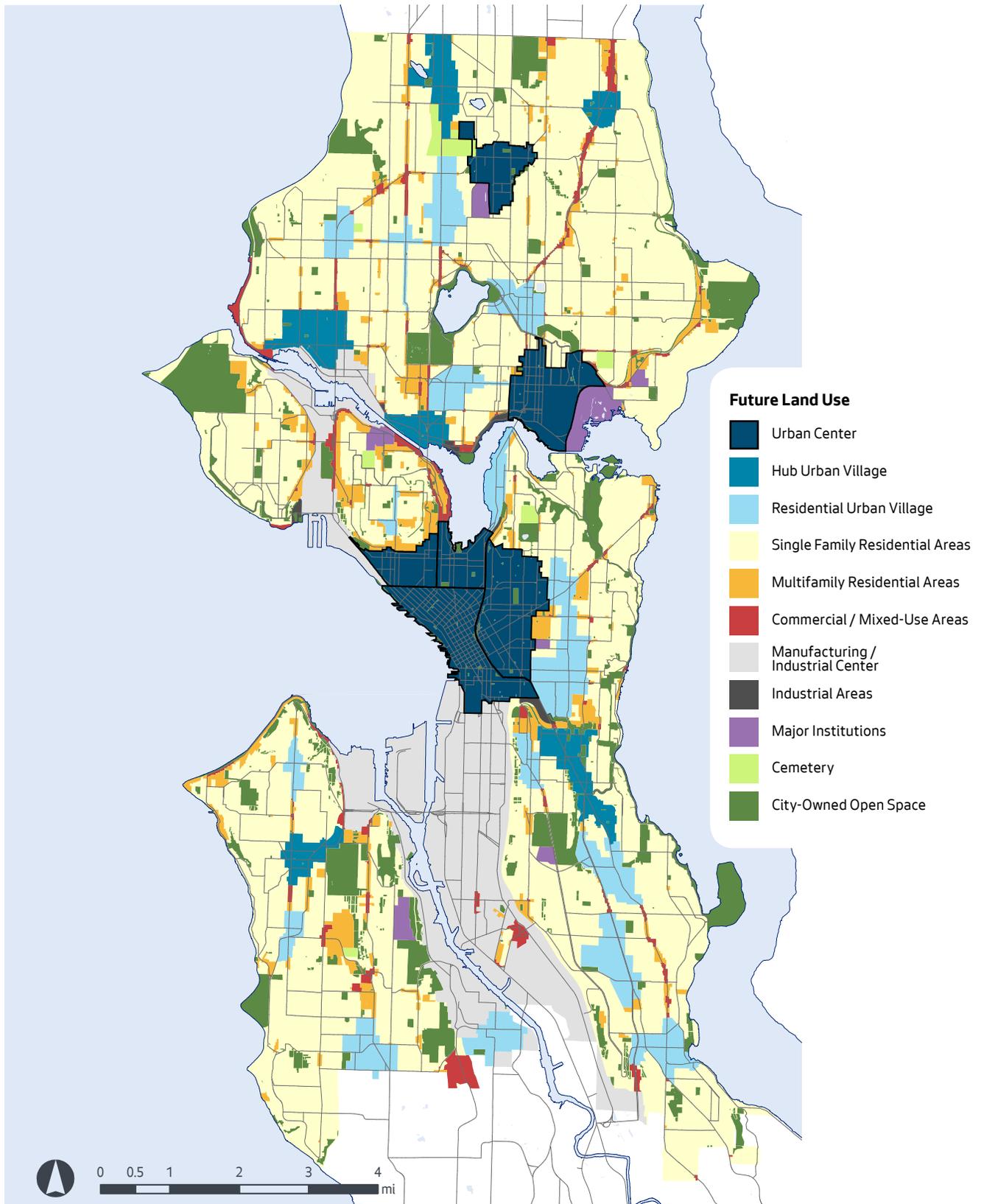
- **Community.** Developing strong connections between a diverse range of people and places.
- **Environmental Stewardship.** Protecting and improving the quality of our global and local natural environment.

- **Economic Opportunity and Security.** Maintaining a strong economy and a pathway to employment, which is fundamental to maintaining our quality of life.
- **Race and Social Equity.** Advocating that limited resources and opportunities must be shared; and that the inclusion of under-represented communities in decision-making processes is necessary.

One key element of the Comprehensive Plan, the Future Land Use Map (FLUM) (Exhibit 4.2-1), outlines the long-term vision of how and where the City will accommodate expected population and job growth over the next 20 years. The FLUM depicts distinct land use designations and types located throughout the city, and each designation specifies the appropriate uses for each area. Five of the land use designations — single-family residential, multifamily residential, commercial/mixed-use, Downtown, and industrial — suggest specific uses. The other designations, such as Urban Center or Hub Urban Village, are broader areas for which multiple uses can be located.

The FLUM also shows four types of urban village designations — urban centers, hub urban villages, residential urban villages, and manufacturing/industrial centers — that identify places where the City will focus new housing, jobs, and industrial activity. Areas designated on the FLUM as single-family residential contain Seattle’s single-family zones. In addition to housing, these areas also contain institutional uses like schools and churches, as well as parklands and cemeteries. The proposed Land Use Code changes analyzed in this EIS would affect only single-family residential areas.

Exhibit 4.2-1 City of Seattle Future Land Use Map



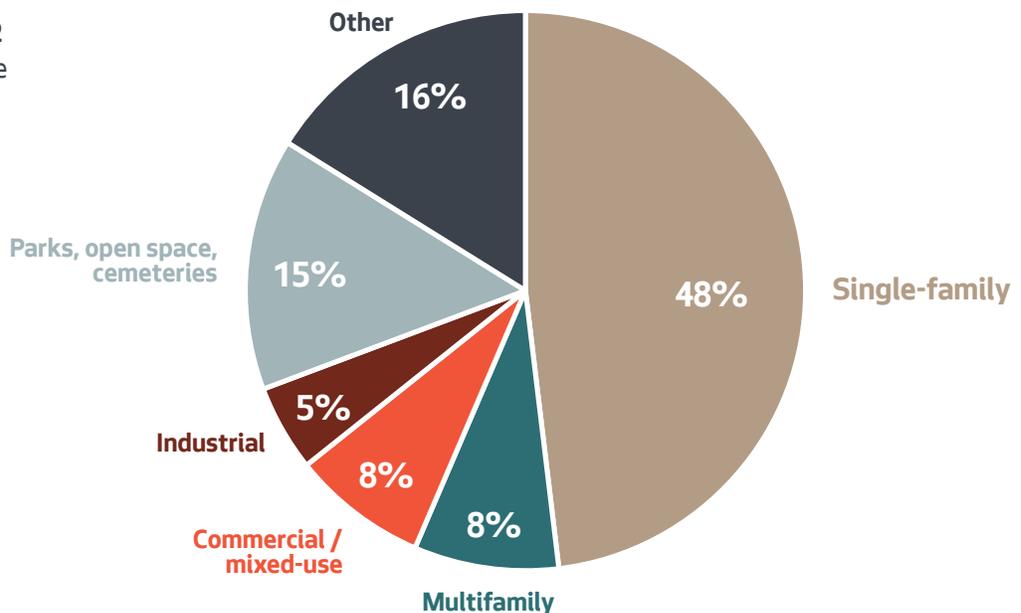
## POPULATION DENSITY

In single-family zones, household size is defined as the sum of the people living in the main house and any ADUs on the lot. For example, a main house with two people and an ADU with two people yields a household size of four. In 2016, the average household size in Seattle was 2.12 people (U.S. Census Bureau 2016). But it varies by structure size. Average household size is 2.74 for households in one-unit structures (detached or attached), 2.06 for households in structures with two to four units, and 1.72 for households in structures with five or more units. Currently, the Land Use Code defines a household as any number of related people, or up to eight unrelated people, and establishes that only one household can live on a lot in a single-family zone.

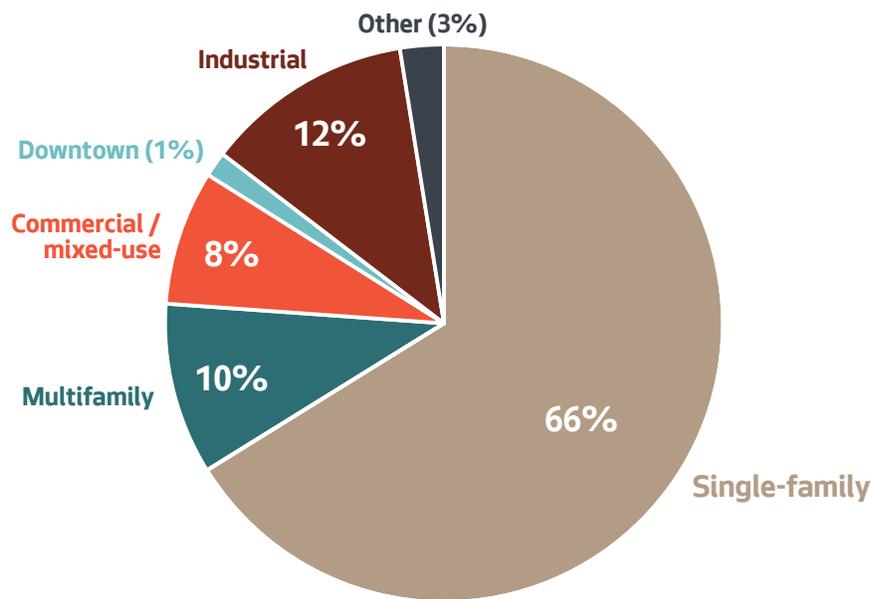
## CURRENT LAND USE AND ZONING

Seattle measures approximately 83 square miles (53,182 acres) in land area. Exhibit 4.2-2 and Exhibit 4.2-3 show the distribution of Seattle's land area by current use and by each zoning category, respectively. Sixty-six percent of Seattle's land area is zoned Single-family Residential. Multifamily Residential zones cover 10.9 percent of land area. Commercial/Mixed Use zones, some of which allow housing, account for 8.6 percent of land area.<sup>1</sup>

**Exhibit 4.2-2**  
Current Land Use in Seattle



<sup>1</sup> Excluding rights-of-way.



**Exhibit 4.2-3**  
Current Zoning in Seattle

In addition to being the largest zoning category, single-family residential is also the largest land use category, comprising almost half (48.1 percent) of current land use. The difference between the amount of land *zoned* and land *used* as single-family is due to the parks, institutions, and other uses present in single-family zones other than detached single-family homes.

As shown in Exhibit 4.2-4, Seattle has three single-family residential zones — SF 9600, SF 7200, and SF 5000 — that vary by the minimum area required to create a new lot. Some areas of Seattle with single-family zoning were platted before current regulations were in place and therefore have lots smaller than what current minimum standards require. While a parcel's current use does not always match the characteristics of its zoning, single-family zones are typified by lots with detached one-unit structures, some with AADUs or DADUs.

Exhibit 4.2-4 City of Seattle Generalized Zoning Map

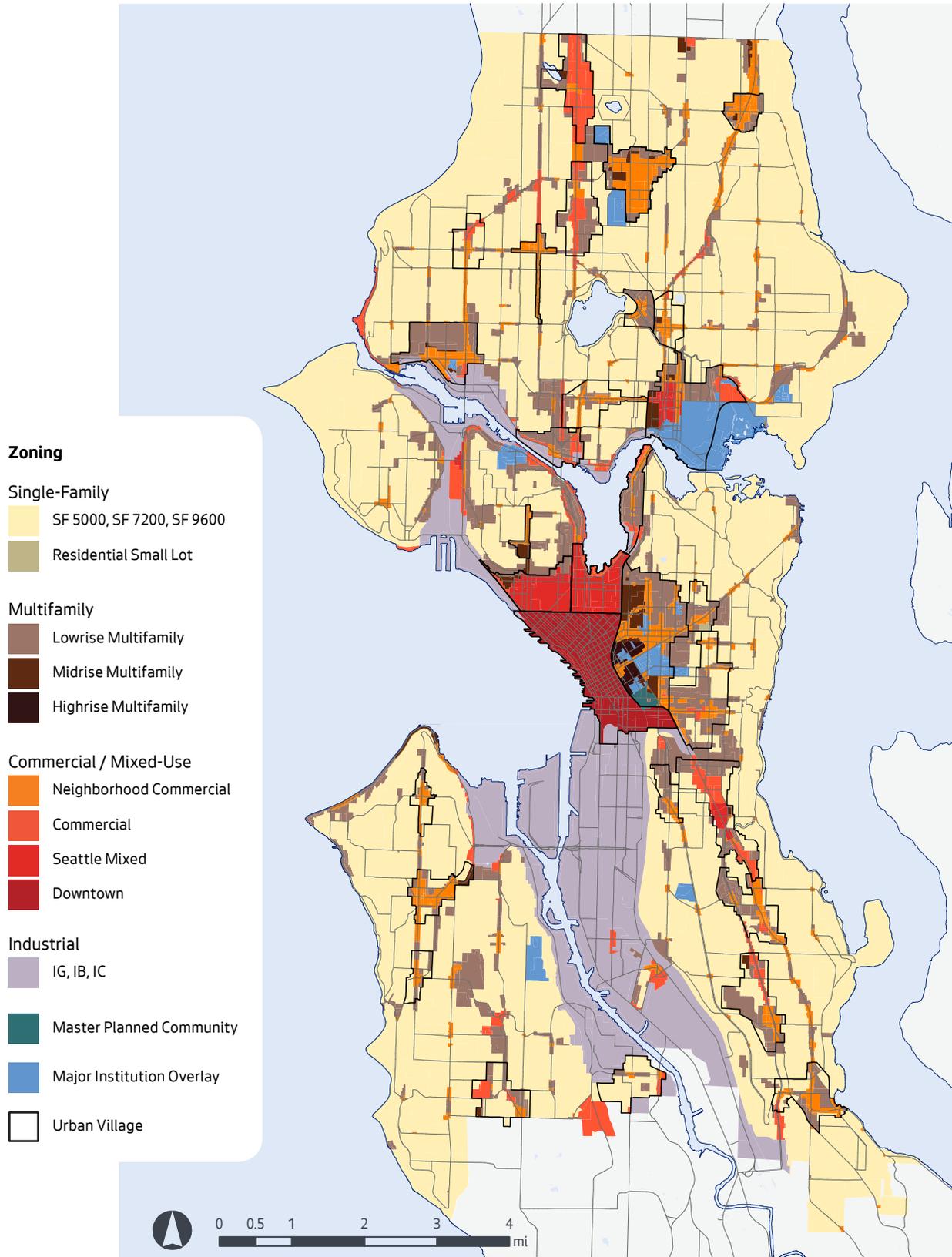
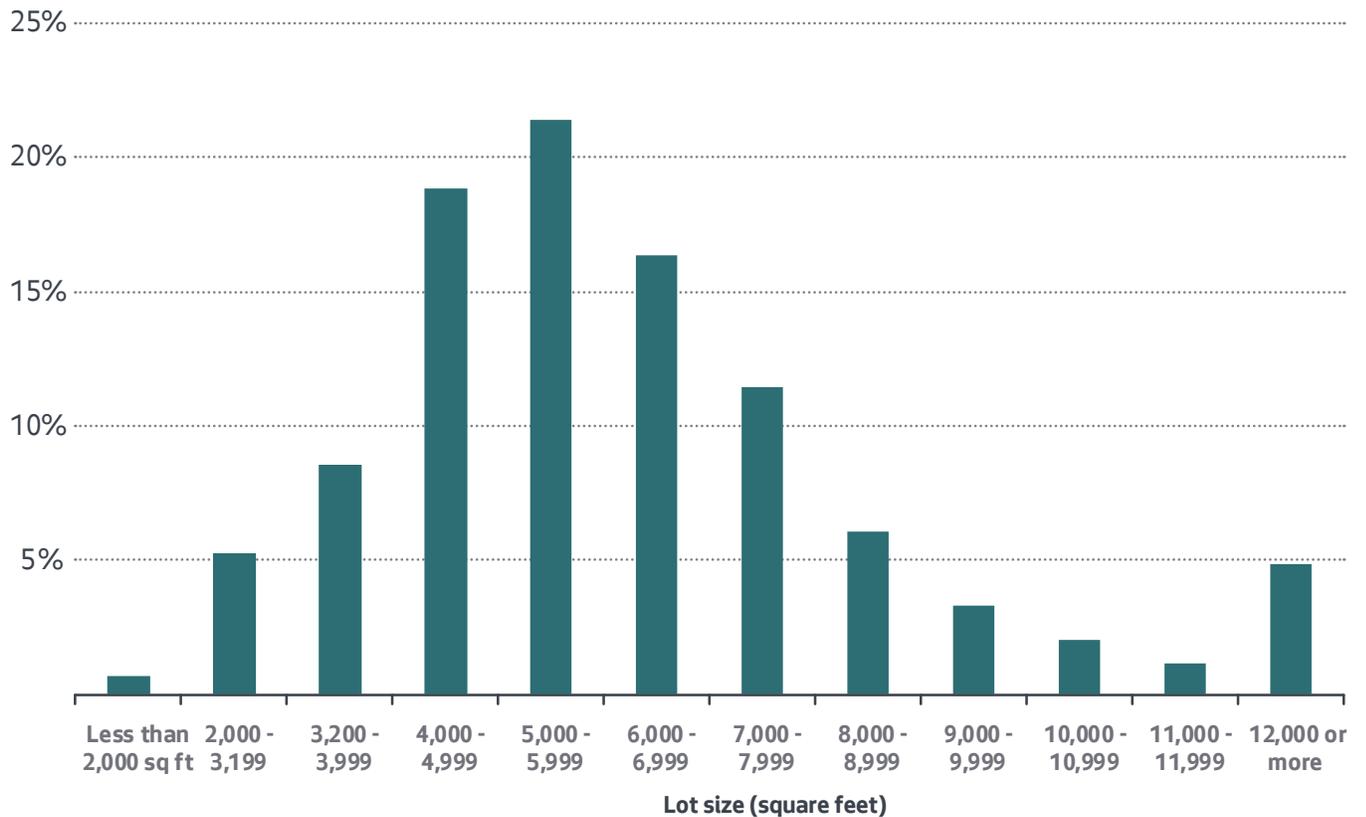


Exhibit 4.2-5 shows the distribution of parcels by lot size across Seattle's single-family zones. About 33 percent of all single-family lots are smaller than 5,000 square feet, the smallest lot size allowed under current zoning. About eight percent have at least twice the minimum area required by the zoning, meaning the lot could theoretically be subdivided into two lots.

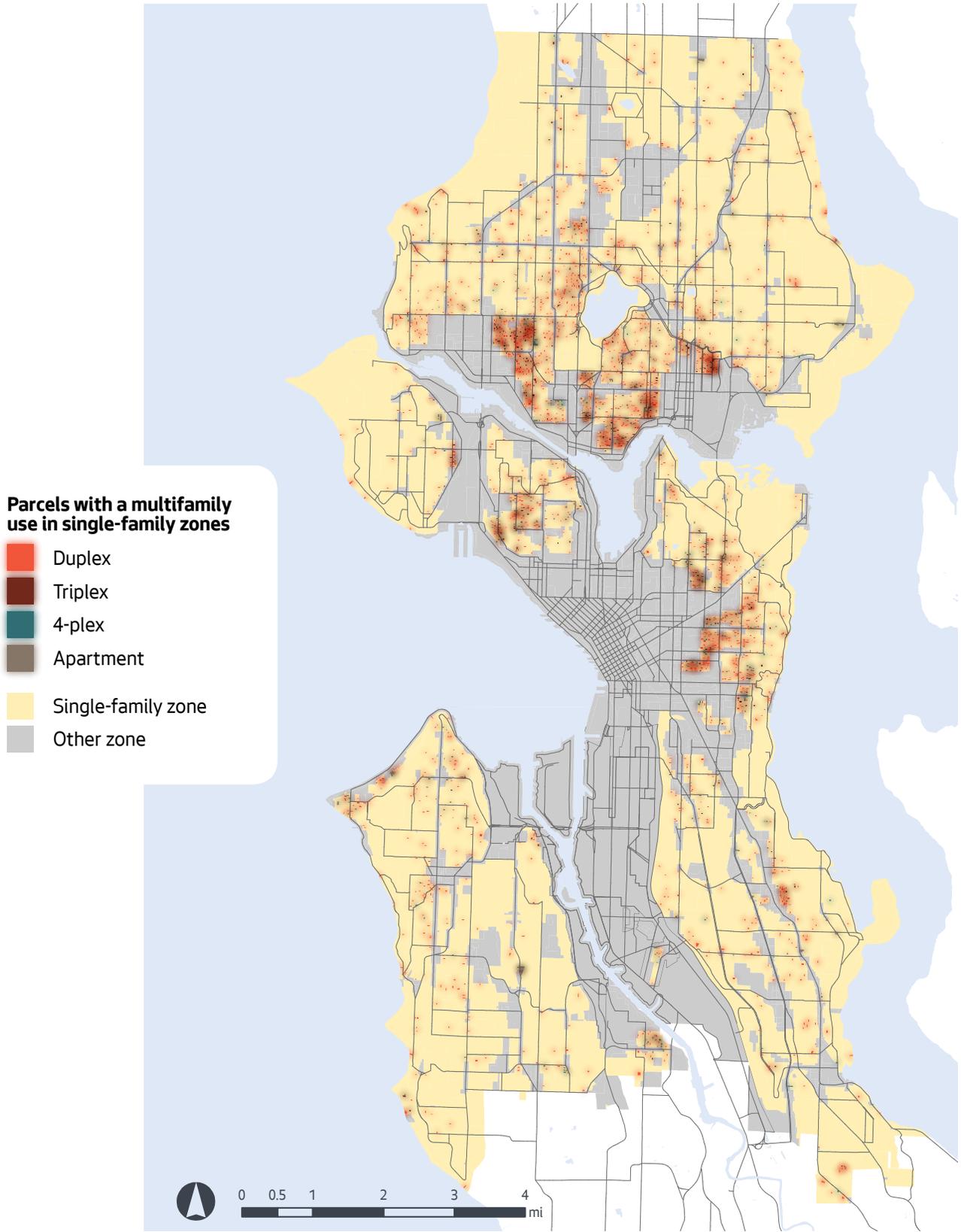
**Exhibit 4.2-5** Distribution of Parcels by Lot Size in Single-Family Zones

Source: ECONorthwest analysis of King County Assessor Data.



Some lots in single-family zones have nonconforming multifamily structures built under previous zoning regimes. (See Section 4.1, Housing and Socioeconomics, for a discussion of Seattle's residential zoning history.) Exhibit 4.2-6 identifies parcels in single-family zones that have a multifamily use, typically a duplex, triplex, or apartment. About 2.3 percent of lots in single-family zones have a multifamily use.

Exhibit 4.2-6 Multifamily Uses in Single-Family Zones

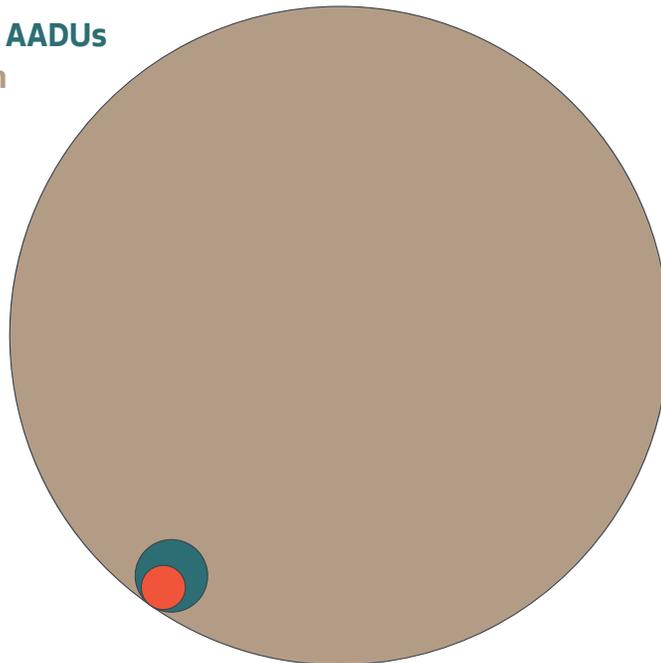


Chapter 23.44 of the Seattle Municipal Code (SMC) regulates single-family zones. Attached ADUs (AADUs) are currently allowed inside or attached to the main house on all lots in single-family zones. Detached ADUs (DADUs) are currently allowed in all single-family zones on lots of at least 4,000 square feet in area and are subject to several other criteria.

AADUs have been allowed citywide as part of a single-family house since 1994. DADUs have been allowed citywide in the rear yard of a lot in a single-family zone since 2010. Through 2017, the City has issued permits for 1,592 AADUs and 579 DADUs. Approximately 1.8 percent of lots in single-family zones have an ADU (Exhibit 4.2-7).

**Exhibit 4.2-7** Lots and ADUs in Single-Family Zones

**579 DADUs and 1,592 AADUs**  
**among 135,000 lots in**  
**single-family zones.**



**New in the FEIS**  
Exhibit 4.2-7 is updated  
in the Final EIS.

## SHORELINES

Seattle's Shoreline District is defined as land within 200 feet of the city's major water bodies — Puget Sound, Lake Washington, Lake Union, and the Lake Washington Ship Canal — and is regulated by the Washington State Shoreline Management Act. The City has adopted the Seattle Shoreline Master Program (SMP) to regulate development in the Shoreline District through regulations in the City's Land Use Code ([SMC 23.60A](#)), maps of the locations of shoreline environments, and the Shoreline Restoration and Enhancement Plan.

The SMP divides the Shoreline District into 11 distinct shoreline environments. The Comprehensive Plan states that the Urban Residential (UR) Environment allows residential use in the Shoreline District when developed in a manner that protects shoreline ecological functions (Shoreline Areas G37). Within the UR Environment, ADUs are allowed only on upland (non-waterfront) lots per Table A for [SMC 23.60A.540](#). DADUs are not allowed in the Shoreline District pursuant to [SMC 23.60A](#).

## TREE CANOPY AND VEGETATION

### Tree Canopy Cover

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Tree canopy cover is the layer of branches, stems, and leaves of a tree that cover the ground when viewed from above.

Canopy cover assessments tell us the extent of Seattle's trees and where they are located and inform urban forestry work planning, management, and investments.

Seattle has a long-standing commitment to its urban forest. Given their many social, environmental, and economic benefits, urban trees are essential to enhancing the community's quality of life. In many single-family zones, typical houses are one or two stories, surrounded by yards and open space that support the growth of large trees. This open space provides much of the city's tree canopy.

Comprehensive Plan policies encourage preservation and expansion of tree canopy throughout the city (Growth Strategy 3.8) and set a goal of increasing canopy coverage to 30 percent by 2037 and to 40 percent over time (Environment 1.2).

Adopted by the City Council in 2013, the Urban Forest Stewardship Plan (UFSP) outlines goals to achieve 30 percent tree canopy and a thriving urban forest that includes a healthy diversity of tree species and ages.

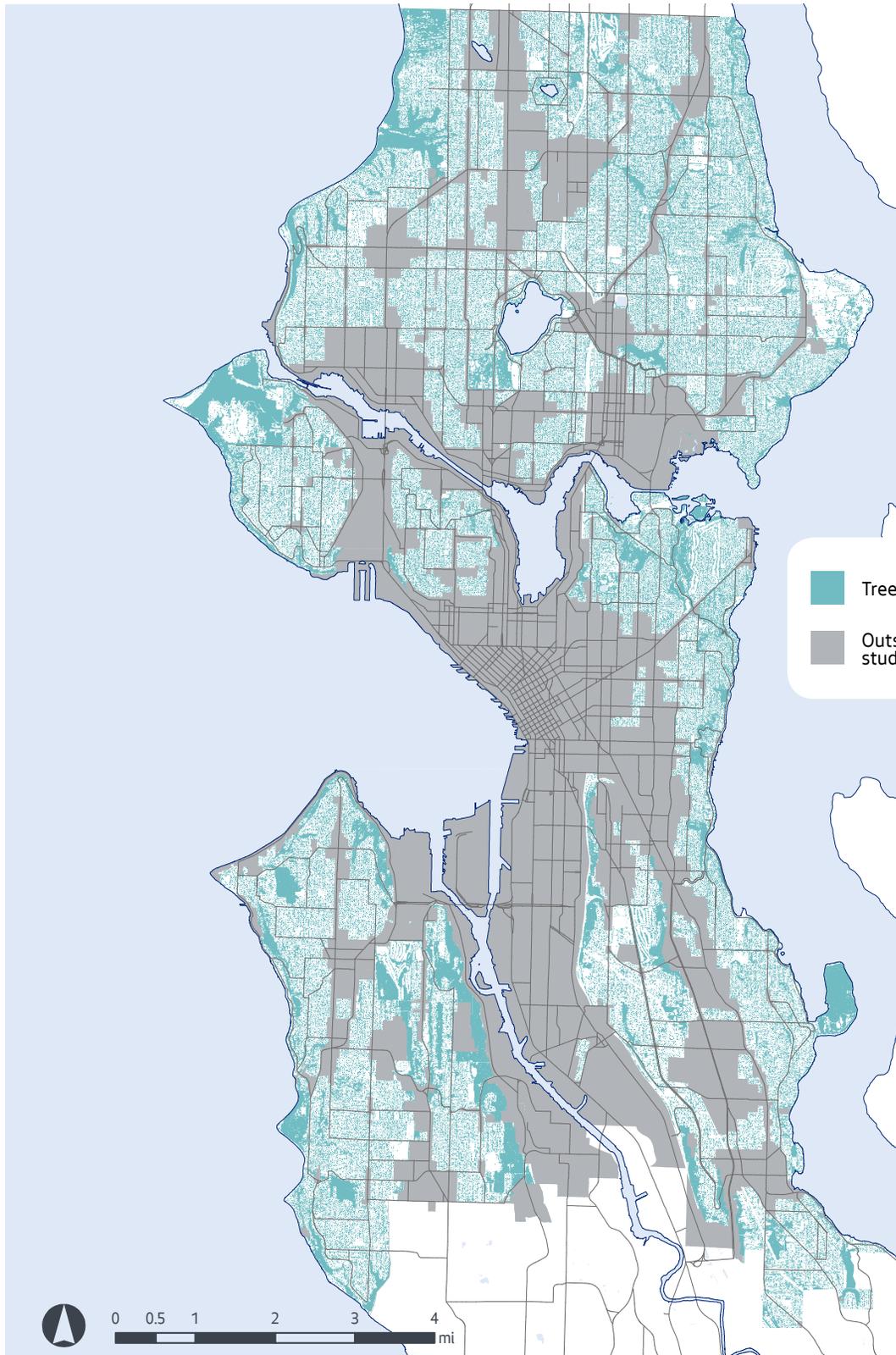
In 2016, the City obtained LiDAR (light detection and ranging) data to assess progress toward its 30-percent canopy cover goal ([Seattle 2016](#)). This study represents the most accurate accounting of Seattle's urban canopy to date and shows:

- Overall, Seattle has 28 percent tree canopy cover.
- Most of Seattle's urban trees are found in residential areas (representing 67 percent of land area with 72 percent of Seattle's tree canopy) and in rights-of-way throughout the city (representing 27 percent of land area and 22 percent of tree canopy).
- Single-family residential areas specifically account for 63 percent of Seattle's overall canopy cover.
- About 72 percent of Seattle's tree canopy is deciduous and 28 percent is coniferous. Most conifers are in single-family residential areas (52 percent).

The assessment report and presentation materials are available at [www.seattle.gov/trees](http://www.seattle.gov/trees).

### Exhibit 4.2-8 Tree Canopy Coverage in Single-Family Zones

Source: 2016 City of Seattle LiDAR data



#### New in the FEIS

Exhibit 4.2-8 is a new exhibit in the Final EIS.

- Tree canopy
- Outside EIS study area

Using the recent 2016 LiDAR dataset, we compared average tree canopy coverage on study area lots with DADUs and the average for other study area lots. Exhibit 4.2-9 summarizes this analysis.<sup>2</sup>

**New in the FEIS**

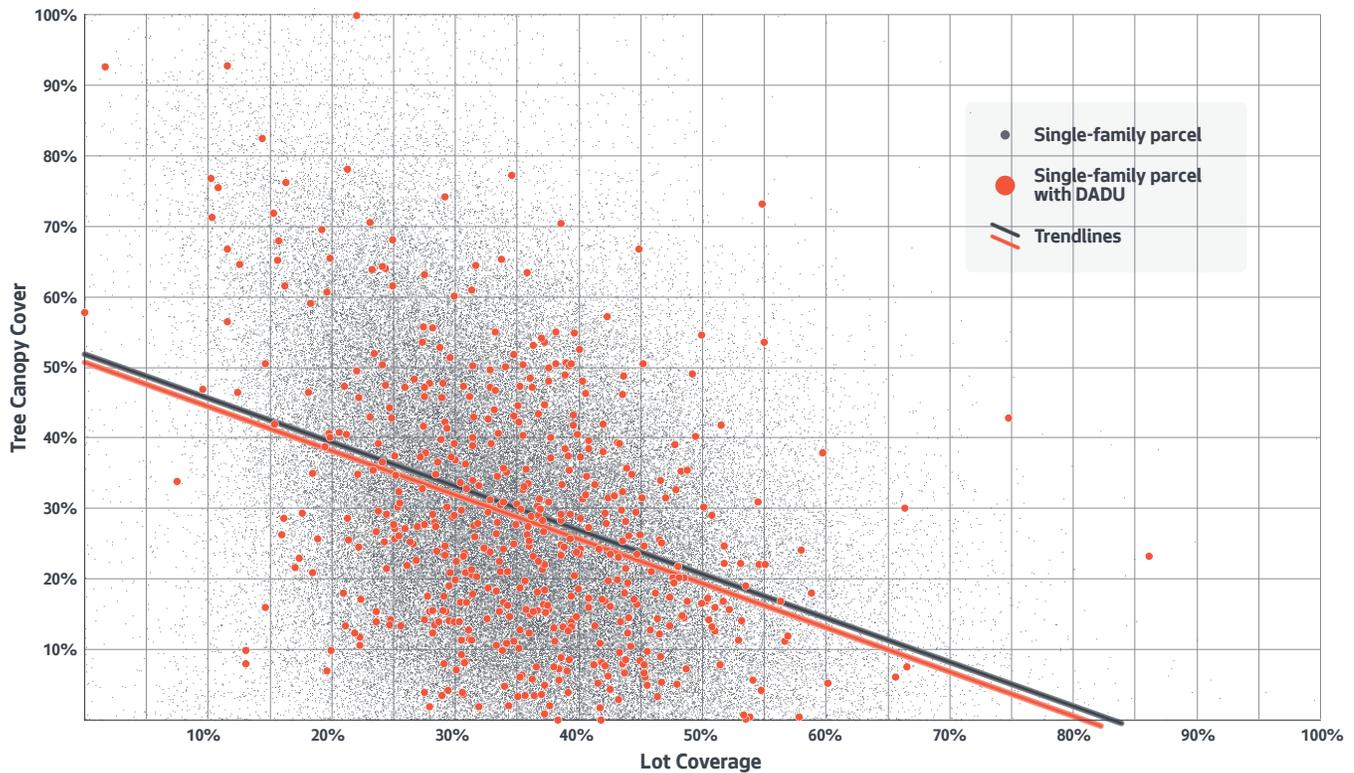
Exhibit 4.2-9 and Exhibit 4.2-10 are new exhibits in the Final EIS.

**Exhibit 4.2-9** Average Tree Canopy Cover on Study Area Parcels in Single-Family Residential Use

	Average percentage tree canopy cover
Study area lots without a DADU	30.8%
Study area lots with a DADU	28.6%
Study area lots with new single-family houses constructed since 2010	22.7%

Exhibit 4.2-10 is a scatterplot of all study area parcels according to their tree canopy coverage, with lots containing DADUs identified. As a comparison measure, the x-axis distributes these lots based on their estimated lot coverage.

**Exhibit 4.2-10** Tree Canopy Coverage and Estimated Lot Coverage for Study Area Parcels



<sup>2</sup> Seattle's single-family zones include various uses, including institutions, parks, and nonconforming multifamily homes. We restricted our query to lots in use for single-family development.

The City's existing tree regulations are established in the Seattle Tree Protection Ordinance (Chapter 25.11 of the SMC). Under 25.11, the City reviews tree removal proposed as part of an application for a development permit. For development in single-family zones, an exceptional tree can be removed only if necessary to achieve the maximum allowed lot coverage. Site plans must identify exceptional trees<sup>3</sup> and trees more than two feet in diameter. Section 25.11.090 also requires mitigation for tree removal. In all zones, each exceptional tree and tree more than two feet in diameter removed during development must be replaced with one or more trees.

As discussed in Section 3.2, Planning Context, the City Council in 2018 proposed a new tree protection bill to increase tree canopy, promote stewardship of existing trees, and improve customer service for the public and applicants. The proposal would replace existing regulations established in Chapter 25.11.

## ENVIRONMENTALLY CRITICAL AREAS

Seattle's ECA Code governs development in areas that provide critical environmental functions. The goal of the City's ECA regulations ([SMC Chapter 25.09](#)) is to protect these areas effectively and assure public safety while allowing reasonable development.

Designated ECAs are defined in [SMC 25.09.012](#) and generally include:

- Geologic hazard areas
- Flood-prone areas
- Wetlands
- Fish and Wildlife Habitat Conservation Areas
- Abandoned landfills

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<sup>3</sup> "Exceptional tree" means a tree or group of trees that, because of its unique historical, ecological, or aesthetic value, constitutes an important community resource and is deemed as such by the Director according to standards promulgated by the Seattle Department of Construction and Inspections. (SMC 25.11.020). See [SDCI Director's Rule 16-2008](#).

The City's ECA regulations have no special provisions for ADUs; rather, ADUs must meet current standards of SMC Chapter 25.09 in addition to the single-family zoning requirements in SMC Chapter 23.44.

Exhibit 4.2-11 summarizes the amount of each ECA type that exists in the EIS study area compared to the total citywide. Maps of ECAs are available on the website of the Seattle Department of Construction and Inspections (SDCI) at <http://seattlecitygis.maps.arcgis.com/apps/webappviewer/index.html?id=f822b2c6498c4163b0cf908e2241e9c2>.

**Exhibit 4.2-11** Acreage of Environmentally Critical Areas in EIS Study Area

ECA Type	ECAs on Parcels in the Study Area (acres)	ECAs Citywide (acres)	Percentage Share of ECAs in the Study Area
<b>Wildlife Habitat</b>	595.7	5,538.5	11%
<b>Wetland</b>	85.8	546.9	16%
<b>Steep Slope Area</b>	1,706.6	4,379.5	39%
<b>Riparian Corridor</b>	452.0	1,496.5	30%
<b>Potential Slide</b>	1,756.3	4,471.4	39%
<b>Potential Liquefaction Area</b>	472.8	8,023.5	6%
<b>Peat Settlement Prone Area</b>	190.1	1,943.8	10%
<b>Landfill</b>	275.6	1,820.4	15%
<b>Known Slide</b>	172.4	380.9	45%
<b>Flood-Prone Area</b>	83.5	1,010.5	8%

## **OPEN SPACE**

Seattle Parks and Recreation (SPR) operates approximately 6,400 acres of parks, open space areas, and facilities. This includes more than 485 parks, extensive natural areas, athletic fields, tennis courts, play areas, specialty gardens, and more than 25 miles of boulevards and 120 miles of trails. Other open spaces in Seattle include fields and playgrounds associated with public and private schools, waterfront access points operated by the Port of Seattle and the Seattle Department of Transportation, and open spaces on college and university campuses. In total, parks, open space, and cemeteries account for roughly 11 percent of Seattle's land area. About 89 percent of these uses are located in single-family zones.

The Parks and Open Space Element of the City's Comprehensive Plan establishes goals and polices for parks, open space, and recreation facilities to serve Seattle's growing population. In 2017, the City adopted the 2017 Parks and Open Space Plan (2017 Plan), a separate but complementary document to the Comprehensive Plan. The six-year 2017 Plan establishes a citywide level of service (LOS) of 8.0 acres per 1,000 residents and defines SPR's long-term acquisition priorities and capital investments consistent with the Comprehensive Plan's policies. SPR's planning reflects official growth estimates from the Puget Sound Regional Council and adopted in the City's Comprehensive Plan. Seattle currently has 9.34 acres of parks and open space for every 1,000 residents. In anticipation of 120,000 new residents by 2035, SPR plans to acquire at least 40 acres of parkland to maintain the minimum LOS of 8.0 acres per 1,000 residents (City of Seattle, 2017c).

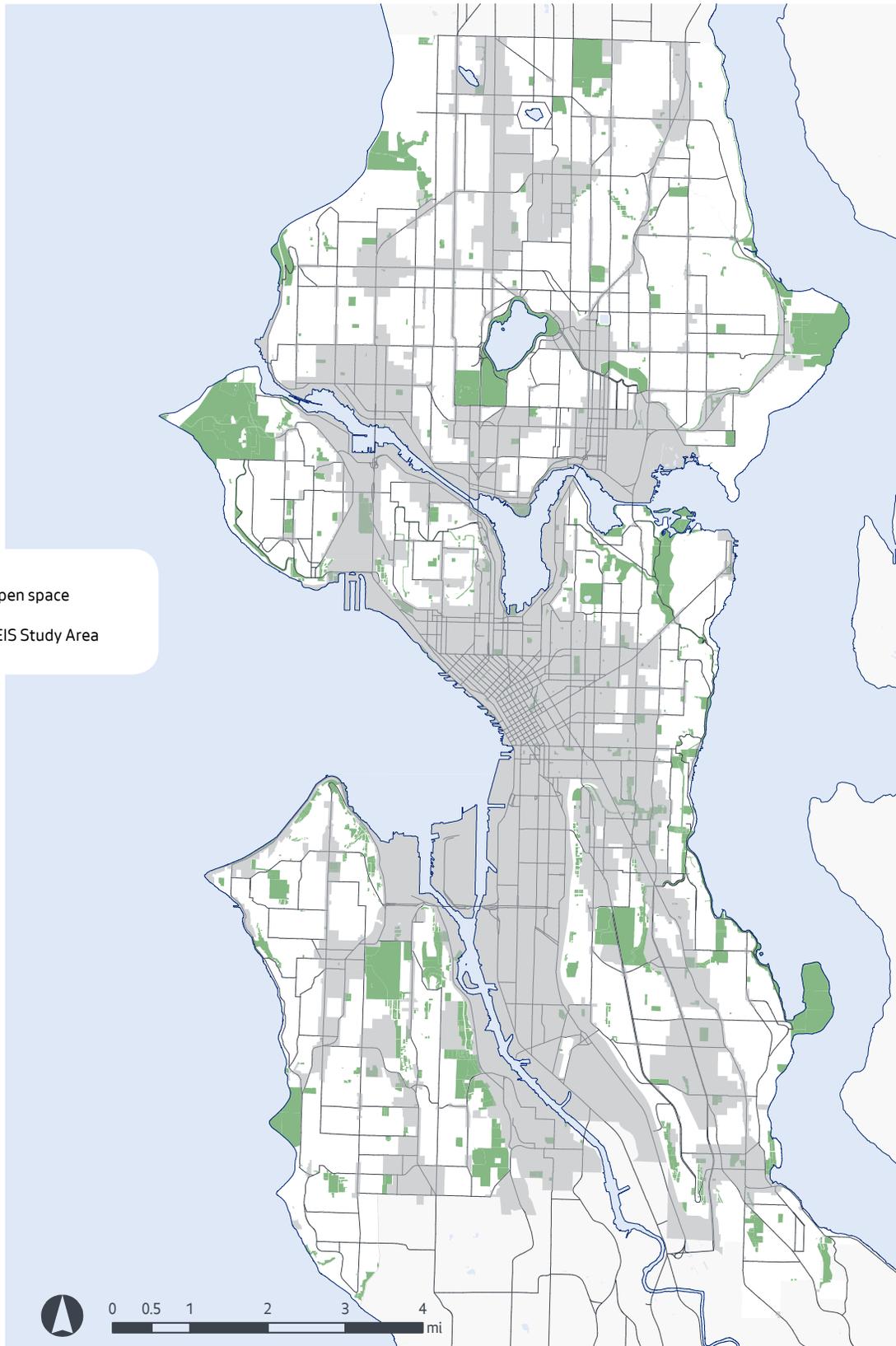
The 2017 Plan identifies open space gaps and prioritizes areas for acquisition. Prioritization considers various public resources that serve as parks and open spaces, including property owned by public schools, major institutions, and universities; population density; walkability; equity; and socioeconomic factors. The 2017 Plan's gap analysis identifies areas outside urban villages that have been historically underserved and are home to marginalized populations (e.g., the Georgetown neighborhood and Bitter Lake/Aurora area) (City of Seattle, 2017c). SPR will continue to prioritize areas for acquisition identified in the gap analysis.

**Exhibit 4.2-12** Parks, Open Space, and Greenbelts Maintained by Seattle Parks and Recreation

**New in the FEIS**

Exhibit 4.2-12 is a new exhibit in the Final EIS.

-  Park or open space
-  Outside EIS Study Area



## **HISTORIC RESOURCES**

### **Landmarks**

Since 1973, the City has designated more than 450 sites, buildings, and other historic resources as City of Seattle landmarks through the Landmarks Preservation Ordinance (SMC 25.12.350). When the Landmarks Preservation Board designates a property as a landmark, City staff and property owner negotiate, and the Board approves at a public meeting, a Controls and Incentives Agreement that defines the features of the landmark that must be preserved and outlines a process for changing those features. The City Council then must approve a designating ordinance for the landmark.

Exhibit 4.2-13 identifies the location of designated City of Seattle landmarks in the study area for this EIS. One hundred ten designated landmarks are located in single-family zones. For each landmark, the particular controls regulating changes or development vary, as outlined in the individual designating ordinance establishing each landmark. Under all alternatives, any proposal for redevelopment, including creation of an ADU, on property with a designated landmark would require a Certificate of Approval and be subject to review by the Landmarks Preservation Board.

### **Historic Districts**

The City also has eight designated historic districts wherein the appearance and historic integrity of structures and public spaces are regulated by either the Landmarks Preservation Board or a district-specific volunteer board. Historic districts include Ballard Avenue, Columbia City, Fort Lawton, Harvard-Belmont, International District, Pike Place Market, Pioneer Square, and Sand Point. Most land in these districts is outside the EIS study area, though some or all of Fort Lawton, Harvard-Belmont, and Sand Point comprise land with single-family zoning. Exhibit 4.2-13 shows these areas.

### **Other Structures**

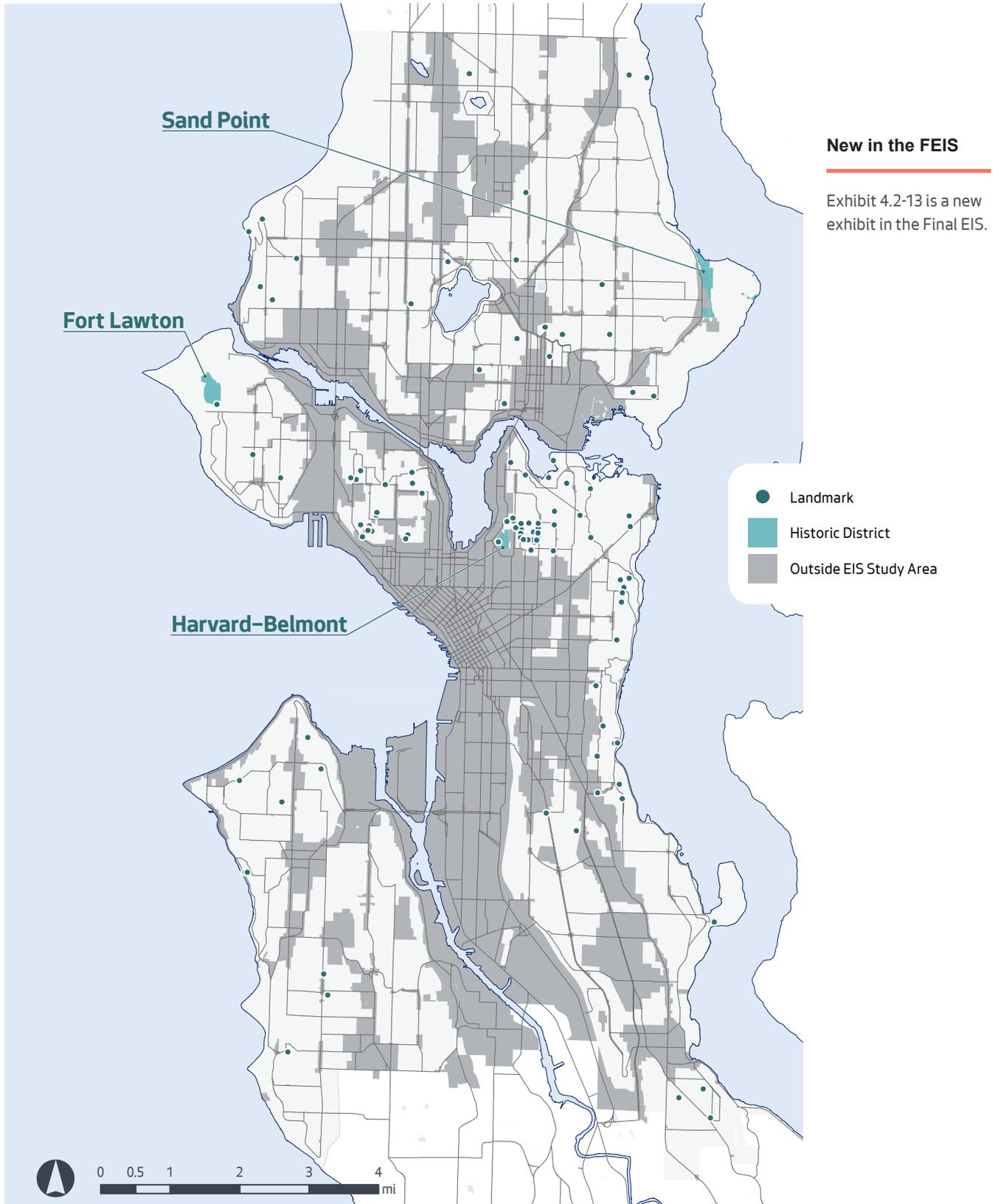
When subject to review under the State Environmental Policy Act (SEPA), projects involving demolition or substantial modifications to structures more than 50 years old adjacent to or across the street from designated Seattle Landmarks are referred to the City's Historic Preservation Officer for an assessment of potential adverse impacts on the designated

landmark (SMC 25.05.675.H). If adverse impacts are identified, mitigation measures may be required, such as sympathetic facade, street, or design treatments; reconfiguration of the project; and relocation of the project on the project site. Projects with fewer than 20 residential units and less than 12,000 square feet of commercial space are exempt from SEPA. This includes redevelopment or replacement of single-family residences.

Structures in Seattle's single-family zones have a very wide range of ages. Portions of the study area have a concentration of structures older than 50 years. Since homeowners can generally renovate and alter homes without historic resources review, the age of a structure is not a reliable indicator of merit as a historic resource. Some historic-aged structures not already designated as landmarks may possess characteristics that make them eligible for consideration as as landmarks. Reliable, consistent data is not available to identify such instances. Likewise, subareas with a high concentration of existing and unaltered historic-aged homes may be regarded by some as having historic resources value despite currently lacking any designation as a historic district. Some neighborhoods, such as Ravenna-Cowen and Mount Baker, have sought or are pursuing status as a local, state, or national historic district.

Portions of the study area also contain resources associated with and valued by marginalized or underrepresented immigrant communities or racial and ethnic minority populations. This could include land originally inhabit by indigenous people. Some structures or portions of neighborhoods may have architectural features that do not meet the criteria for a historic designation but are nonetheless regarded as valuable in cultural history, such as the Central Area.

Exhibit 4.2-13 Landmarks and Historic Districts



## 4.2.2 Impacts

This section discusses the potential land use impacts from Alternatives 1, 2, and 3 and the Preferred Alternative. ~~Alternatives 2 and 3~~ The action alternatives differ in the scale and focus of the proposed changes. Alternative 2 represents the broadest range of changes to the Land Use Code and would allow the greatest flexibility for constructing ADUs. Alternative 3 considers more modest adjustments to the Land Use Code that would result in fewer ADUs constructed than under Alternative 2.

### METHODOLOGY

Land use impacts can result from many factors, such as intensifying uses (rezoning a residential area to allow for commercial uses); incompatible uses (an industrial development near homes); or land use changes inconsistent with the Comprehensive Plan. Two types of land use impacts are relevant to the construction of ADUs and considered in this analysis:

- **Increased density.** Increased density occurs when there is an increased number of people or dwelling units on a single-family lot. Increased population density can cause impacts from more noise, pedestrian and vehicle traffic, and parking constraints. Increases in the density of dwelling units can result in impacts from vegetation and tree removal.
- **Change in building scale.** Land use impacts may occur from increasing the scale of buildings that can be built in an area. These impacts can result from constructing larger and/or taller buildings, increasing maximum height or floor area ratio (FAR) limits, or modifying required setbacks. Increased building scale can cause impacts from view blockage, decreased access to light and air at ground level, and reductions in privacy.

Impacts from increasing density and changes to building scale were evaluated by considering the potential for the change to constitute a fundamental change in land use form. Our threshold for impacts centered on whether newly constructed ADUs would be incompatible with existing development in the city's single-family zones. Given that single-family dwellings are the principal use permitted outright in these zones, the primary question was: ~~whether are~~ ADUs were compatible in scale and density with the existing land use pattern of single-family zones? Some examples of changes that might be considered a fundamental change in land use form include allowing subdivisions, duplexes, apartments, or rezoning to a denser zoning, such as Residential Small Lot, or multifamily.

To determine the potential changes in population density from constructing additional ADUs, we calculated the potential increase in population that could be expected on each single-family lot with an ADU. We anticipate the average number of people living in an ADU would be lower than the overall average household size in Seattle's single-family zones because ADUs tend to be smaller than single-family houses. As data was not available for the average number of people living in an ADU in Seattle, we used available data from Portland, Oregon, as a proxy (Horn et al 2013). The Portland data showed that an average of 1.36 people live in each ADU. For purposes of this analysis, we rounded up that number to assume an average of 1.5 people per ADU. On lots with two ADUs, this would equate to 3 people living in ADUs. Although not anticipated, we also considered the maximum number of ADU occupants based on the proposed Land Use Code changes. For Alternatives 1 and 2, and the Preferred Alternative, this would result in 4 people per ADU; for Alternative 3, we assumed 4 people per ADU on a lot with one ADU and 2 people per ADU on a lot with two ADUs.

## IMPACTS OF ALTERNATIVE 1 (NO ACTION)

Under Alternative 1 (No Action), no changes would be made to the Land Use Code. Population and housing growth would continue in accordance with the Seattle 2035 Comprehensive Plan and current zoning regulations. Real estate and housing market considerations aside, the current trajectory for the construction of ADUs would continue, and we anticipate that approximately ~~4,890~~ 1,970 ADUs could be constructed between 2018 and 2027. Because existing regulatory barriers to ADU development would remain, fewer ADUs would be constructed under Alternative 1 (No Action) compared to Alternatives 2 and 3 and the Preferred Alternative. Negligible impacts to building and population density would be anticipated from the ADUs constructed over time. There would be no change to the scale of ADUs allowed under existing Land Use Code regulations.

## IMPACTS OF ALTERNATIVE 2

### Land Use

Under Alternative 2, the proposed Land Use Code changes to encourage ADU development would be consistent with the Seattle 2035 Comprehensive Plan. No changes to existing zoning designations are proposed. Alternative 2 supports the Comprehensive Plan's vision for

housing options that create a thriving, vibrant city. Specifically, the Land Use Code changes would:

- Support more housing development, consistent with the Seattle 2035 Comprehensive Plan's established growth strategy and Housing Affordability and Livability Agenda (HALA) recommendations.
- Maintain existing land use patterns in single-family zones by continuing to allow detached single-family housing as the principal use permitted outright and ADUs that are compatible in scale with single-family houses.
- Gradually increase density and building scale in single-family zones as development occurs that is consistent with existing land use patterns.
- Encourage greater variety of housing types in the city's residential areas.

As described in Section 4.1 Housing and Socioeconomics, compared to Alternative 1 (No Action), Alternative 2 could result in ~~1,440~~ 2,310 additional ADUs (or ~~3,330~~ 4,280 total ADUs) throughout Seattle between 2018 and 2027. This would include:

- ~~880~~ 590 additional lots in single-family zones with both an AADU and DADU constructed, which is not allowed under Alternative 1 (No Action)
- ~~270 fewer~~ 250 additional lots in single-family zones with ~~only exactly~~ one AADU constructed
- ~~50 fewer~~ 880 additional lots in single-family zones with ~~only exactly~~ one DADU constructed

~~Alternative 2 would increase the likelihood of two ADUs constructed on the same lot but decrease the number of lots with only one ADU constructed.~~ For analysis purposes, we assumed that every new ADU constructed would use the maximum available square footage and height. The ~~3,330~~ 4,280 ADUs that could be constructed under Alternative 2 — ~~1,400~~ 2,310 ADUs more than in Alternative 1 (No Action) — could lead to minor changes to building scale.

Changes to scale would result from alterations to the development standards for DADUs, including:

- Decreasing the minimum lot size from 4,000 square feet to 3,200 square feet

- Increasing the maximum gross floor area limit for a DADU from 800 square feet to 1,000 square feet and excluding garage and storage areas from the gross floor area calculation
- Increasing the rear yard coverage limit for DADUs and other accessory structures from 40 to 60 percent, if the total height of the DADU is 15 feet or less in height<sup>4</sup>
- Increasing the maximum height limits 1-3 feet (with 1-2 additional feet for a DADU that meets green roof standards)
- Allowing height limit exceptions for projections like dormers that add interior space

Collectively, these changes would allow construction of slightly larger DADUs on smaller lots than currently allowed.

We anticipate the Land Use Code changes proposed under Alternative 2 could decrease the number of existing houses torn down and redeveloped from ~~2,610~~ 2,030 under Alternative 1 (No Action) to ~~2,460~~ 1,800. The highest and best use analysis discussed in Section 4.1, Housing and Socioeconomics, finds that Alternative 2 would tend to increase the feasibility of retaining an existing house and adding one or two ADUs (rather than demolishing) compared to Alternative 1 (No Action). Although a minor decrease, this reduction in teardowns would help preserve the existing land use form in single-family residential zones. For discussion of the aesthetic impacts, including how the proposed changes would impact the visual character of neighborhoods in the study area, please see Section 4.3 Aesthetics.

Changes to building density would result from the creation of additional ADUs. Relative to Seattle's 348,000 existing housing units and the 40,000 new units constructed between 2010 and 2017, the addition of approximately ~~1,440~~ 2,310 ADUs more than Alternative 1 (No Action) would be a small change. These impacts would be minor as the density changes would unfold incrementally over 10 years and would likely continue to be distributed throughout the city.

Changes in population density would result from the creation of additional ADUs. On each lot where an ADU is constructed, we anticipate an increase in population density of an average of 1.5 people per ADU (or maximum of 4 people per ADU). This would correspond to about ~~2,160~~ 3,465 more residents (or a maximum of ~~5,760~~ 9,240 residents) than under Alternative

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<sup>4</sup> Rear yard coverage for structures other than a DADU cannot exceed 40 percent.

1 (No Action) over the 10-year study period. These impacts would be minor as the population changes would unfold incrementally over 10 years and would likely continue to be distributed throughout the city.

Localized impacts could occur if ADU production is higher in a concentrated area, such as a particular block in the study area. Impacts in areas with increases in population density could include greater noise, exposure to cooking smells, and changes in privacy due to the presence of more neighbors. These impacts are likely to be minor.

Overall, these impacts would be negligible to minor and would not constitute a fundamental change in the land use pattern of Seattle's single-family zones. Because they are either part of an existing house (AADU) or allocated in a detached "backyard cottage" structure with a familiar physical form and smaller scale than allowed for a principal house (DADU), ADUs would be associated and compatible with single-family residential zones. Since urban form varies across the study area, specific impacts of Alternative 2 to architectural character and design features like building setbacks and yards due to greater ADU production could vary depending on neighborhood context but are likely to be minor.

## Shorelines

Alternative 2 would not alter existing regulations for ADU development on lots in the Shoreline District. DADUs would continue not to be allowed in the Shoreline District pursuant to SMC 23.60A. Any additional AADUs constructed in the Shoreline District would be subject to existing regulations. Therefore, impacts to shorelines would not occur.

## Tree Canopy and Vegetation

The anticipated increase in DADU construction under Alternative 2 could result in more vegetation and tree removal than under Alternative 1 (No Action) as more property owners would use some of their rear yard for the footprint of a DADU. Compared to Alternative 1 (No Action) (990 ~~1,150~~ DADUs), Alternative 2 (~~1,380~~ 2,235 DADUs) could result in ~~390~~ 1,085 additional DADUs. Allowing a one-story DADU to cover more of the rear yard by increasing the rear yard coverage limit from 40 percent to 60 percent could also result in a greater loss of vegetation or tree canopy.

While single-family zones account for a large share of the city's tree canopy, the specific percentage of canopy in the rear yard of a given lot varies widely. It would be speculative to predict an amount of tree canopy loss that could result from either the ~~390~~ 1,085 additional DADUs

in Alternative 2 or the proposed increase in the rear yard coverage limit. However, we can roughly estimate the scale of potential impact from Alternative 2 in the context of all land in Seattle's single-family zones and the canopy cover it provides. Single-family residential areas currently provide 9,574 acres of tree canopy cover. If all ~~390~~ 1,085 additional DADUs maximize the size limit of 1,000 square feet, the total footprint of DADUs would be just under ~~nine~~ 25 acres, or less than ~~0.4~~ 0.3 percent of the total tree canopy in single-family residential areas. If these nine acres were entirely tree canopy today, removing them would have minor to negligible impact on the overall tree canopy in single-family residential areas. This upper-limit estimate also assumes that existing tree regulations would not require preservation of any trees in the DADU footprint area and that homeowners voluntarily would make no design or siting choices in order to preserve existing trees.

At the same time, removing the off-street parking requirement could reduce the amount of vegetation and tree removal otherwise needed to accommodate a parking space when creating an ADU.

Alternative 2 does not propose any revisions to existing tree regulations in Seattle's Tree Protection Ordinance (SMC 25.11). Under SMC 25.11, the City would review tree removal required for constructing a DADU as part of the permit application. Exceptional trees could be removed only if protecting the tree during construction would prevent use of the maximum allowed lot coverage. See page 3-31 for information about proposed updates to tree policies that the City Council is currently considering.

It would be speculative to estimate the net effect of Alternative 2 with respect to tree canopy and vegetation since potential impacts vary for every lot depending on the presence of existing trees and vegetation, the City's review of any potential tree removal, and whether the owner elects not to provide a parking space. Overall, the ~~390~~ 1,085 additional DADUs constructed in Alternative 2 compared to Alternative 1 (No Action) could have a small impact on tree canopy and vegetation. In the context of the 135,000 lots in Seattle's single-family zones, impacts from ~~390~~ 1,085 additional DADUs would likely be minor overall.

## Environmentally Critical Areas

Alternative 2 would not alter the regulations for ECAs as described in SMC 25.09. Development of ADUs would continue to be subject to ECA

### Exceptional Trees

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Defined in Director's Rule 16-2008, exceptional trees have important historic, ecological, or aesthetic value due to their size and species.

regulations. Therefore, current trends regarding the types and degree of impact to ECAs are likely to continue under Alternative 2.

### Open Space

Alternative 2 could result in about 2,310 additional ADUs between 2018 and 2027 compared to Alternative 1 (No Action). We anticipate that the increase in ADU production could result in about 3,465 additional residents (and a theoretical maximum of 9,240 additional residents) on lots with ADUs in single-family zones compared to Alternative 1 (No Action). Overall demand for parks and open space would increase with population growth; however, SPR anticipates and continues to plan for this growth. Alternative 2 would meet the 2017 citywide LOS if SPR acquires 40 acres of park and open space land. According to the 2017 Parks and Open Space Plan, land acquisition to mitigate the projected growth considered in the Comprehensive Plan is feasible (City of Seattle, 2017c). Any population change associated with ADU production under Alternative 2 would fall within the growth considered in the Comprehensive Plan EIS. Therefore, we do not anticipate adverse impacts on parks and open space. Growth exceeding these projections would increase the amount of additional park and open space land needed or result in decreased LOS.

### Historic Resources

Alternative 2 would not alter existing controls for designated landmarks or requirements for development in designated historic districts. Alternative 2 would not change the existing threshold for review of potential landmark status. Any proposed change to a structure or redevelopment of a property with landmark status or located in a historic district would continue to be subject to review by the Landmarks Preservation Board. Compared to Alternative 1 (No Action), we anticipate 230 fewer single-family homes to be demolished under Alternative 2, reducing the relative likelihood of impacts on historic resources due to demolition.

Even absent demolition, it is possible that addition of an ADU to a structure or site could alter the structure, site, or setting such that its historical integrity is diminished. Compared to Alternative 1 (No Action), we anticipate 2,310 additional ADUs under Alternative 2. The design of these ADUs could be sympathetic to historic character, yielding no impact on historic resources. Assumption of an adverse in all cases would be speculative.

## IMPACTS OF ALTERNATIVE 3

### Land Use

Land Use Code changes to encourage ADU development under Alternative 3 would be consistent with the Seattle 2035 Comprehensive Plan, and no changes to existing zoning designations are proposed. Alternative 3 supports the Comprehensive Plan's vision for housing options that create a thriving, vibrant city. Specifically, the Land Use Code changes would:

- Support more housing development, consistent with the Seattle 2035 Comprehensive Plan's established growth strategy and Housing Affordability and Livability Agenda (HALA) recommendations.
- Maintain existing land use patterns in single-family zones by continuing to allow detached single-family housing as the principal use permitted outright and ADUs that are compatible in scale with single-family houses.
- Gradually increase density and building scale in single-family zones as development occurs that is consistent with existing land use patterns.
- Encourage greater variety of housing types in the city's residential areas.

Construction of additional ADUs in the study area as a result of the proposed Land Use Code changes under Alternative 3 could increase the density and scale of development. However, the impacts of these changes would be less than under Alternative 2, since we anticipate fewer ADUs would be constructed.

As described in Section 4.1 Housing and Socioeconomics, compared to Alternative 1 (No Action), Alternative 3 could result in ~~1,210~~ 1,430 additional ADUs (or ~~3,100~~ 3,400 ADUs total) throughout Seattle between 2018 and 2027. Alternative 3 could result in:

- ~~740~~ 480 additional lots in single-family zones with both an AADU and a DADU constructed, which is not allowed under Alternative 1 (No Action)
- ~~250 fewer~~ 80 additional lots in single-family zones with only one AADU constructed
- ~~30 fewer~~ 390 additional lots in single-family zones with only one DADU constructed

Construction of ~~3,100~~ 3,400 ADUs (~~1,210~~ 1,430 more than Alternative 1) could lead to minor changes in population and residential density and to building scale.

Changes to building density would occur directly from the creation of ADUs. Relative to Seattle's 348,000 existing housing units and the 40,000 new units constructed between 2010 and 2017, the addition of approximately ~~1,210~~ 1,430 ADUs would be a small change. These impacts would be minor as the density changes would occur incrementally over 10 years and be distributed throughout the city.

Changes in population density would result from the creation of additional ADUs. Unlike Alternative 2, no change to the maximum household size would occur in Alternative 3, so changes to population density would be the result only of additional ADU production and therefore would be somewhat smaller than Alternative 2. On each lot where an ADU is constructed, we anticipate an increase in population density of an average of 1.5 people per ADU (or maximum of 4 people per ADU). This would correspond to about ~~1,815~~ 2,145 more residents (or a maximum of ~~1,860~~ 5,720 residents) than under Alternative 1 (No Action) over the ~~ten-year~~ 10-year study period. These impacts would likely be minor as the population changes would unfold incrementally over 10 years and would likely continue to be distributed throughout the city.

Localized impacts could occur if ADU production is higher in a concentrated area, such as a particular block in the study area. Impacts in areas with increases in population density could include greater noise, exposure to cooking smells, and changes in privacy due to the presence of more neighbors. These impacts are likely to be minor.

Changes to scale would occur from alterations to the development standards for DADUs, including:

- Decreasing the minimum lot size from 4,000 square feet to 3,200 square feet
- Increasing the gross floor area limit from 800 square feet to 1,000 square feet, including garage and storage areas
- Increasing the rear yard coverage limit for DADUs and other accessory structures from 40 to 60 percent, if the total height of the DADU is 15 feet or less ~~in height~~
- Increasing the maximum height limits by 1-3 feet
- Allowing height limit exceptions for projections like dormers that add interior space

Collectively, these changes would allow construction of slightly larger DADUs on smaller lots than currently allowed. The changes would be slightly less than described under Alternative 2. Alternative 3 also includes an FAR limit that would limit the size of detached single-family houses, moderating building scale impacts since new construction would be more similar in size to existing structures. The effect of the FAR limit would further lessen scale impacts compared to Alternative 2.

We anticipate the Land Use Code changes proposed under Alternative 3 would decrease the number of existing houses torn down and redeveloped compared to Alternative 1 (No Action). While Alternative 2 could also reduce demolitions from ~~2,610~~ 2,030 under Alternative 1 (No Action) to ~~2,460~~ 1,800, Alternative 3 could result in even fewer demolitions (~~2,200~~ 1,670). Our analysis finds the feasibility of retaining an existing house and adding one or more ADUs would be higher under Alternative 3 than under Alternatives 1 and 2, primarily due to the maximum FAR limit for new construction.

Like Alternative 2, these density and scale impacts would be minor and would not constitute a fundamental change in the land use pattern of Seattle's single-family zones. Because they are either part of an existing house (AADU) or allocated in a detached "backyard cottage" structure with a familiar physical form and smaller scale than allowed for a principal house (DADU), ADUs would be associated and compatible with single-family residential zones. Since urban form varies across the study area, specific impacts of Alternative 3 to architectural character and design features like building setbacks and yards due to greater ADU production could vary depending on neighborhood context but are likely to be minor.

## Shorelines

Alternative 3 would not alter existing regulations for ADU development in the Shoreline District. DADUs would continue not to be allowed in the Shoreline District pursuant to SMC 23.60A. Any additional AADUs constructed in the Shoreline District would be subject to existing regulations. Therefore, impacts to shorelines would not occur.

## Tree Canopy and Vegetation

Impacts to tree canopy and vegetation would be less than those described under Alternative 2, both because fewer DADUs would be constructed and the FAR limits imposed. Compared to Alternative 1 (No Action) (~~990~~ 1,150 DADUs), Alternative 3 (up to 1,330 1,780 DADUs if all lots with two ADUs

include a DADU) could result in 340 630 additional DADUs. In addition, the proposed FAR limit would tend to reduce the footprint of new houses, which would also reduce the potential for impacts to tree canopy and vegetation.

Alternative 3 would require off-street parking for lots with two ADUs, reducing the positive impact on trees and vegetation compared to Alternative 2, where no off-street parking would be required. Still, it would be speculative to estimate the net effect of Alternative 3. While we estimate 50 fewer DADUs would be constructed compared to Alternative 2 (340 instead of 390), more lots would likely create off-street parking. Like Alternative 2, overall impacts on tree canopy and vegetation from Alternative 3 would likely be minor in the context of the 135,000 lots in single-family zones.

### **Environmentally Critical Areas**

Alternative 3 would not alter the regulations for ECAs as described in SMC 25.09. Development of ADUs would continue to be subject to ECA regulations. Therefore, current trends regarding the types and degree of impact to ECAs are likely to continue under Alternative 3.

### **Open Space**

Alternative 3 could result in about 1,430 additional ADUs compared to Alternative 1 (No Action). We anticipate that the increase in ADU production could result in about 2,145 additional residents (and a theoretical maximum of 3,800 additional residents) on lots with ADUs in single-family zones compared to Alternative 1 (No Action). As described for Alternative 2, even if this resulted in a corresponding increase in 3,800 additional residents in Seattle, we do not anticipate adverse impacts on parks and open space.

### **Historic Resources**

Alternative 3 would not alter existing controls for designated landmarks or requirements for development in designated historic districts. Alternative 2 would not change the existing threshold for review of potential landmark status. Any proposed change to a structure or redevelopment of a property with landmark status or located in a historic district would continue to be subject to review by the Landmarks Preservation Board. Alternative 3 introduces an FAR limit that would reduce the maximum allowed size and scale of development in single-

family zones, discourage demolition of existing homes, and increase the relatively feasibility of creating ADUs. Therefore, compared to Alternative 1 (No Action), we anticipate 360 fewer single-family homes to be demolished under Alternative 3, reducing the likelihood of impacts on historic resources due to demolition even further than Alternative 2. We anticipate fewer ADUs under Alternative 3 compared to Alternative 2; therefore, impacts from the creation of ADUs would be slightly less than those described for Alternative 2.

## **IMPACTS OF THE PREFERRED ALTERNATIVE**

### **Land Use**

Land Use Code changes to encourage ADU development under the Preferred Alternative would be consistent with the Seattle 2035 Comprehensive Plan, and no changes to existing zoning designations are proposed.

The Preferred Alternative supports the Comprehensive Plan's vision for housing options that create a thriving, vibrant city. Specifically, the Land Use Code changes would:

- Support more housing development, consistent with the Seattle 2035 Comprehensive Plan's established growth strategy and Housing Affordability and Livability Agenda (HALA) recommendations.
- Maintain existing land use patterns in single-family zones by continuing to allow detached single-family housing as the principal use permitted outright and ADUs that are compatible in scale with single-family houses.
- Gradually increase density and building scale in single-family zones as development occurs that is consistent with existing land use patterns.
- Encourage greater variety of housing types in the city's residential areas.

Construction of additional ADUs in the study area as a result of the proposed Land Use Code changes under the Preferred Alternative could increase the density and scale of development. The impacts of these changes would be between those described for Alternatives 2 and 3 because the Preferred Alternative would result in ADU production similar to Alternative 2 and includes the FAR limit contemplated in Alternative 3.

As described in Section 4.1 Housing and Socioeconomics, compared to Alternative 1 (No Action), the Preferred Alternative could result in 2,460 additional ADUs (or 4,430 ADUs total) throughout Seattle between 2018 and 2027. The Preferred Alternative could result in:

- 620 lots in single-family zones with two ADUs, which is not allowed under Alternative 1 (No Action)
- 250 additional lots in single-family zones with exactly one AADU constructed
- 970 additional lots in single-family zones with exactly one DADU constructed
- Construction of 4,430 ADUs (2,460 more than Alternative 1) could lead to minor changes in population and residential density and to building scale.

Changes to building density would occur directly from the creation of ADUs. Relative to Seattle's 348,000 existing housing units and the 40,000 new units constructed between 2010 and 2017, the addition of approximately 2,460 ADUs would be a small change. These impacts would be minor as the density changes would occur incrementally over 10 years and be distributed throughout the city.

Changes in population density would result from the creation of additional ADUs. Like Alternative 2, the Preferred Alternative increases the household size limit to 12 unrelated people for lots with two ADUs. On each lot where an ADU is constructed, we anticipate an increase in population density of an average of 1.5 people per ADU (or maximum of 4 people per ADU). This would correspond to about 3,690 more residents (or a maximum of 9,840 residents) than under Alternative 1 (No Action) over the 10-year study period. These impacts would likely be minor as the population changes would unfold incrementally over 10 years and would likely continue to be distributed throughout the city.

Localized impacts could occur if ADU production is higher in a concentrated area, such as a particular block in the study area. Impacts in areas with increases in population density could include greater noise, exposure to cooking smells, and changes in privacy due to the presence of more neighbors. These impacts are likely to be minor.

Changes to scale would occur from alterations to the development standards for DADUs, including:

- Decreasing the minimum lot size from 4,000 square feet to 3,200 square feet

- Increasing the gross floor area limit from 800 square feet to 1,000 square feet, excluding garage and storage areas
- Increasing the rear yard coverage limit for DADUs and other accessory structures from 40 to 60 percent, if the total height of the DADU is 15 feet or less and subject to limitations on tree removal
- Increasing the maximum height limits by 1-3 feet (with 1-2 additional feet for a DADU that incorporates green building strategies)
- Allowing height limit exceptions for projections like dormers that add interior space

Collectively, these changes would allow construction of slightly larger DADUs on smaller lots than currently allowed. The changes would be similar to those described under Alternative 2, though like Alternative 3 the Preferred Alternative also includes an FAR limit that would limit the size of detached single-family houses, moderating building scale impacts since new construction would be more similar in size to existing structures. The effect of the FAR limit would further lessen scale impacts compared to Alternative 2.

We anticipate the Land Use Code changes proposed under the Preferred Alternative would decrease the number of existing houses torn down and redeveloped compared to Alternative 1 (No Action). The Preferred Alternative would result in the fewest demolitions of all alternatives (1,580), compared to 2,030 demolitions under Alternative 1 (No Action) or 1,800 and 1,670 under Alternatives 2 and 3, respectively. Our analysis finds the feasibility of retaining an existing house and adding one or more ADUs would be highest under the Preferred Alternative due to the maximum FAR limit for new construction and flexibility for creating ADUs.

The density and scale impacts of the Preferred Alternative would be minor and would not constitute a fundamental change in the land use pattern of Seattle's single-family zones. Because they are either part of an existing house (i.e., an AADU) or located in a detached "backyard cottage" structure with a familiar physical form and smaller scale than allowed for a principal house (i.e., a DADU), ADUs would be associated and compatible with single-family residential zones. Since urban form varies across the study area, specific impacts of the Preferred Alternative to architectural character and design features like building setbacks and yards due to greater ADU production could vary depending on neighborhood context but are likely to be minor.

## **Shorelines**

The Preferred Alternative would not alter existing regulations for ADU development in the Shoreline District. DADUs would continue not to be allowed in the Shoreline District pursuant to SMC 23.60A. Any additional AADUs constructed in the Shoreline District would be subject to existing regulations. Therefore, impacts to shorelines would not occur.

## **Tree Canopy and Vegetation**

Impacts to tree canopy and vegetation would resemble those described for Alternative 2. While we anticipate slightly more DADUs under the Preferred Alternative (2,430) compared to Alternative 2 (2,235), the Preferred Alternative includes the FAR limit discussed above for Alternative 3, which would tend to reduce the footprint of new houses and the potential for impacts to tree canopy and vegetation. Like Alternative 2, the Preferred Alternatives removes the off-street parking requirement, which could reduce the amount of vegetation and tree removal otherwise needed to accommodate a parking space when creating an ADU. Further, additional rear yard coverage under the Preferred Alternative would apply only if DADU construction did not result in tree removal.

It would be speculative to estimate the net effect of the Preferred Alternative with respect to tree canopy and vegetation. Of all alternatives, we anticipate the most DADUs under the Preferred Alternative — 1,280 more than Alternative 1 (No Action) — but coupled with policies, like removal of parking requirements, that help reduce impacts on trees and vegetation. Like Alternatives 2 and 3, overall impacts on tree canopy and vegetation from the Preferred Alternative would likely be minor in the context of the 135,000 lots in single-family zones.

## **Environmentally Critical Areas**

The Preferred Alternative would not alter the regulations for ECAs as described in SMC 25.09. Development of ADUs would continue to be subject to ECA regulations. Therefore, current trends regarding the types and degree of impact to ECAs are likely to continue under the Preferred Alternative.

## **Open Space**

The Preferred Alternative would result in about 2,460 additional ADUs compared to Alternative 1 (No Action). We anticipate that the increase

in ADU production could result in about 3,690 additional residents (and a theoretical maximum of 9,840 additional residents) on lots with ADUs in single-family zones compared to Alternative 1. As described for Alternative 2, even if this resulted in a corresponding increase in 3,690 additional residents in Seattle, we do not anticipate adverse impacts on parks and open space.

## **Historic Resources**

The Preferred Alternative would not alter existing controls for designated landmarks or requirements for development in designated historic districts. Alternative 2 would not change the existing threshold for review of potential landmark status. Any proposed change to a structure or redevelopment of a property with landmark status or located in a historic district would continue to be subject to review by the Landmarks Preservation Board. Like Alternative 3, the Preferred Alternative includes an FAR limit that would reduce the maximum allowed size and scale of development in single-family zones, discourage demolition of existing homes, and increase the relatively feasibility of creating ADUs. Therefore, compared to Alternative 1 (2,030 demolitions), we anticipate the fewest number of single-family homes to be demolished (1,580 demolitions) under the Preferred Alternative. We anticipate slightly more ADUs under the Preferred Alternative compared to Alternative 2; therefore, impacts from the creation of ADUs would be similar to those described for Alternative 2.

### **4.2.3 Mitigation Measures**

No significant adverse impacts are anticipated to land use; therefore, no mitigation measures are proposed.

### **4.2.4 Significant Unavoidable Adverse Impacts**

Under all three alternatives, Seattle would continue to experience population growth that would increase housing development in neighborhoods throughout the city. Single-family zones would continue to see some existing structures renovated, enlarged, and demolished as new construction occurred to accommodate new households and respond to changing economic conditions. This is an outcome we expect in a dynamic,

growing city. Some localized land use conflicts and compatibility issues in single-family zones could arise under any alternative as growth occurs. However, no significant unavoidable adverse impacts on land use are anticipated as a result of the proposed Land Use Code changes.

## 4.2.5 Regulatory Consistency Analysis

The Comprehensive Plan establishes policies that guide the development of the city in the context of regional growth management. The Plan aims to give all Seattle residents better access to jobs, education, affordable housing, parks, community centers, and healthy food. The City uses the Plan to help make decisions about proposed ordinances, capital budgets, policies, and programs. Each element of the Comprehensive Plan generally presents goals followed by policies related to those goals and may also include a discussion about the goals and policies. The goals and policies represent outcomes the City hopes to realize over the life of the Plan. This section identifies aspects of the Comprehensive Plan applicable to the proposed action. The proposed action is generally consistent with the goals and policies described below that guide the development of Land Use Code policy.

The Comprehensive Plan recognizes that in single-family residential areas "...different housing types, such as accessory dwelling units or backyard cottages, could increase the opportunity for adding new housing units in these areas." The Land Use Element of the Comprehensive Plan addresses how Seattle should change and grow in the coming years and provide specific guidance about the content and interpretation in the City's Land Use Code to meet each land use goal.

Land Use Goal 7 has associated policies that apply to ADUs:

**Land Use Goal 7** Provide opportunities for detached single-family and other compatible housing options that have low height, bulk, and scale in order to serve a broad array of households and incomes and to maintain an intensity of development that is appropriate for areas with limited access to services, infrastructure constraints, fragile environmental conditions, or that are otherwise not conducive to more intensive development.

The policies associated with Land Use Goal 7 that are pertinent to the proposed action include:

**Land Use Policy 7.4** Allow detached single-family dwellings as the principal use permitted outright in single-family residential areas.

**Land Use Policy 7.5** Encourage accessory dwelling units, family-sized units, and other housing types that are attractive and affordable, and that are compatible with the development pattern and building scale in single-family areas in order to make the opportunity in single-family areas more accessible to a broad range of households and incomes, including lower-income households.

**Land Use Policy 7.10** Reflect the character of existing low-density development through the regulation of scale, siting, structure orientation, and setbacks.

**Land Use Policy 7.12** Emphasize measures that can increase housing choices for low-income individuals and families when considering changes to development standards in single-family areas.

The City uses development standards to ensure that new buildings fit in with the architectural character of a neighborhood or reflect the future vision for a certain area. Development standards also help builders care for the environment and consider the physical limits of certain areas. Land Use Goal 5 establishes the importance of using development standards to shape the look and feel of Seattle's neighborhoods; its associated policies focus on addressing the height, bulk, and scale of new buildings.

**Land Use Goal 5** Establish development standards that guide building design to serve each zone's function and produce the scale and character desired, while addressing public health, and safety and welfare.

The policies associated with Land Use Goal 5 that are pertinent to the proposed action include:

**Land Use Policy 5.3** Control the massing of structures to make them compatible with the area's planned scale, provide a reasonable ratio of open to occupied space on a site, and allow the building to receive adequate natural light.

**Land Use Policy 5.4** Use maximum height limits to maintain the desired scale relationship between new structures, existing development, and the street environment; address varied topographic conditions; and limit public view blockage. In certain Downtown zones and in industrial zones, heights for certain types of development uniquely suited to those zones may be unlimited.

**Land Use Policy 5.6** Establish setbacks in residential areas as needed to allow for adequate light, air, and ground-level open space; help provide privacy; promote compatibility with the existing development pattern; and separate residential uses from more intensive uses.

**Land Use Policy 5.7** Employ development standards in residential zones that address the use of the ground level of new development sites to fit with existing patterns of landscaping, especially front yards in single-family residential areas, and to encourage permeable surfaces and vegetation.

Land Use Goal 6 provides specific guidance related to regulating off-street parking:

**Land Use Goal 6** Regulate off-street parking to address parking demand in ways that reduce reliance on automobiles, improve public health and safety, reduce greenhouse gas emissions, lower construction costs, create attractive and walkable environments, and promote economic development throughout the city.

The policies associated with Land Use Goal 6 that are pertinent to the proposed action include:

**Land Use Policy 6.1** Establish parking requirements where appropriate for both single-occupant vehicles and their alternatives at levels that further this Plan's goal to increase the use of public transit, car pools, walking, and bicycles as alternatives to the use of single-occupant vehicles.

**Land Use Policy 6.2** Modify residential parking regulations, where parking is required, to recognize differences in the likely auto use and ownership of intended occupants of new developments, such as projects provided for low-income, elderly, or residents with disabilities.

**Land Use Policy 6.6** Limit the off-street impacts on pedestrians and surrounding areas by restricting the number and size of automobile curb cuts, and by generally requiring alley access to parking when there is an accessible, surfaced alley.

**Land Use Policy 6.9** Require parking in areas with limited transit access and set the requirements to discourage underused parking facilities, even if occasional spillover parking could result.

The Housing Element of the Comprehensive Plan establishes citywide goals and policies to guide the types of housing the City will encourage and the tools the City will use to make it possible for people who work

in Seattle to live here as well. Addressing injustices and protecting marginalized populations is a primary focus of the Housing Element. Several goals and policies in the Housing Element are relevant to the proposed action to increase ADU production:

**Housing Goal 1** Provide fair and equal access to housing for all people in Seattle.

**Housing Goal 2** Help meet current and projected regional housing needs of all economic and demographic groups by increasing Seattle's housing supply.

**Housing Goal 3** Achieve a mix of housing types that provide opportunity and choice throughout Seattle for people of various ages, races, ethnicities, and cultural backgrounds and for a variety of household sizes, types, and incomes.

**Housing Goal 4** Achieve healthy, safe, and environmentally sustainable housing that is adaptable to changing demographic conditions.

**Housing Goal 5** Make it possible for households of all income levels to live affordably in Seattle, and reduce over time the unmet housing needs of lower-income households in Seattle.

Housing policies relevant to the development of ADUs include:

**Housing Policy 1.3** Work to overcome historical patterns of segregation, promote fair housing choices, and foster inclusive communities that are free from discrimination through actions, such as affirmative marketing and fair housing education and enforcement.

**Housing Policy 2.5** Monitor the supply of housing and encourage the replacement of housing that is demolished or converted to nonresidential or higher-cost residential use.

**Housing Policy 2.6** Seek to identify affordable housing at risk of demolition and work to mitigate the displacement of residents ahead of planned upzones.

**Housing Policy 3.4** 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.

**Housing Policy 4.4** Increase housing opportunities for older adults and people with disabilities by promoting universal design features for new and renovated housing. [Note: this policy addresses universal design. The action alternatives would allow an increase in the rear yard coverage limit for a DADU that is at most 15 feet in height. This

is one strategy to accommodate one-story designs intended for people with limited mobility.

**Housing Policy 4.8** Explore ways to reduce housing development costs.

**Housing Policy 5.18** Consider implementing programs that require affordable housing with new development, with or without rezones or changes to development standards that increase development capacity.

**Housing Policy 5.20** Implement strategies and programs to help ensure a range of housing opportunities affordable for Seattle's workforce.

The Transportation Element guides transportation investments to serve the city's current residents and businesses equitably and to accommodate Seattle's future growth. Several goals and policies in the Transportation Element are relevant to the proposed action to increase ADU production:

**Transportation Goal 2** Allocate space on Seattle's streets to safely and efficiently connect and move people and goods to their destinations while creating inviting spaces within the rights-of-way.

**Transportation Goal 3** Meet people's mobility needs by providing equitable access to, and encouraging use of, multiple transportation options.

**Transportation Goal 4** Promote healthy communities by providing a transportation system that protects and improves Seattle's environmental quality.

The policies associated with these Transportation Goals that are pertinent to the proposed action include:

**Transportation Policy 2.3** Consider safety concerns, modal master plans, and adjacent land uses when prioritizing functions in the pedestrian, travelway, and flex zones of the right-of-way.

**Transportation Policy 3.3** Consider the income, age, ability, and vehicle-ownership patterns of populations throughout the city in developing transportation systems and facilities so that all residents, especially those most in need, have access to a wide range of affordable travel options.

**Transportation Policy 3.4** Develop a citywide transit system that includes a variety of transit modes to meet passenger capacity needs with frequent, reliable, accessible, and safe service to a wide variety of destinations throughout the day and week.

**Transportation Policy 3.13** Prioritize bicycle and pedestrian investments on the basis of increasing use, safety, connectivity, equity, health, livability, and opportunities to leverage funding.

**Transportation Policy 3.18** Implement curb-space management strategies such as parking time limits, on-street parking pricing, loading zones, and residential parking programs to promote transportation choices, encourage parking turnover, improve customer access, and provide for efficient allocation of parking among diverse users.

**Transportation Policy 4.3** Reduce drive-alone vehicle trips, vehicle dependence, and vehicle-miles traveled in order to help meet the City's greenhouse gas reduction targets and reduce and mitigate air, water, and noise pollution.

The Utilities Element of the Comprehensive Plan notes that, "[a]s Seattle continues to grow over the coming years, the existing utilities infrastructure is well poised to accommodate new buildings, although some development strategies and construction modifications may be required to bring services to individual lots. With proper maintenance and strategic planning, the existing infrastructure will also be able to support this Plan's broader goals of sustainability, economic efficiency, and equitable service access for all Seattleites."

The Utilities Element has a goal and policy relevant to the proposed action to increase ADU production:

**Utilities Goal 1** Provide safe, reliable, and affordable utility services that are consistent with the City's aims of environmental stewardship, race and social equity, economic opportunity, and the protection of public health.

**Utilities Policy 1.5** Ensure that new private development provides adequate investments to maintain established utility service standards.

The Neighborhood Planning section of the Comprehensive Plan also contains goals and policies developed by and for specific areas. The following existing neighborhood plan policies are relevant to the proposed action:

*Greenwood-Phinney Ridge Neighborhood Plan Policies:*

**G/PR-P11** Support the development of accessory dwelling units (ADUs) as a means to accommodate planned housing growth.

*North Beacon Hill Neighborhood Plan Policies:*

**NBH-P9** Allow alternative housing types, such as cottage housing, in single-family zones to support affordable choices while preserving the single-family character.

*Queen Anne (Uptown) Neighborhood Plan Policies:*

**Policy QA-P13** Accessory dwelling units (ADUs) in single-family zones, in the Queen Anne planning area, should continue to be limited to the principal residential structure, and consider requiring that they be subordinate in size and character in order to discourage the development of duplexes and other multifamily structures in these zones.

*Note: This policy suggests that ADUs should continue to be limited to the principal structure. This policy was adopted in March 1999, prior to the 2009 adoption of regulations allowing DADUs in single-family zones citywide.*

*Wallingford Neighborhood Plan Policies:*

**W-P14** Encourage the development of accessory dwelling units in the community as a housing affordability strategy.

*Westwood-Highland Park Neighborhood Plan Policies:*

**W/HP-P21** Encourage quality design in town houses, cottage houses, and accessory dwelling units.

## 4.3 Aesthetics

This section analyzes the scale and form of existing development in single-family zones in Seattle. We identify the potential aesthetic impacts to height, bulk, and scale that could occur under each alternative for the proposed action. Aesthetic impacts are defined by how the Land Use Code changes contemplated under Alternatives 2 and 3 and the Preferred Alternative would affect the visual character of single-family zones. We have prepared and analyzed three-dimensional visual simulations to illustrate potential impacts of continued development of ADUs under Alternative 1 (No Action) and the proposed Land Use Code changes under Alternatives 2 and 3 and the Preferred Alternative.

### 4.3.1 Affected Environment

As described in Section 4.2 Land Use, zoning and development regulations govern development in Seattle. These regulations determine the allowed uses and physical form of new buildings, which together influence urban form. This section describes the existing urban form and regulations that currently govern development in single-family zones in the study area.

#### SEATTLE MUNICIPAL CODE

The City regulates the form of development to achieve several goals, including aesthetic quality, transitions in scale and intensity, and environmental protection. The City's SEPA policies for regulating the height, bulk, and scale of development are as follows ([SMC 25.05.675.G.2.a](#)):

It is the City's policy that the height, bulk, and scale of development projects should be reasonably compatible with the general character of development anticipated by the goals and policies set forth in the Land Use Element, Growth Strategy Element, and Shoreline Element of

the Seattle Comprehensive Plan; the procedures and locational criteria for shoreline environment redesignations set forth in Sections 23.60A.060 and 23.60A.220; and the adopted land use regulations for the area in which they are located, and to provide for a reasonable transition between areas of less intensive zoning and more intensive zoning.

## CURRENT URBAN FORM

The form of existing development varies widely across single-family zones in Seattle; therefore, a comprehensive summary is not possible. However, because the proposed Land Use Code changes would affect infill development in already developed neighborhoods, documenting common built form conditions provides a baseline for analyzing the aesthetic impacts of each alternative.

The study area consists of neighborhoods with homes of varying size and age. Generally, older homes are one- or two-story structures (Exhibit 4.3-1) and are smaller than the allowed three-dimensional space new single-family development can occupy (called the "zoning envelope"). Many recently built homes are three stories and fill the allowed zoning envelope (Exhibit 4.3-2). Most areas with single-family zoning in Seattle have an established pattern of development that spans several decades; a typical block has houses with an age of 50 years or older. Houses set back 10 to 15 feet from the street and front yards planted with grass or other ornamental landscaping characterize many single-family-zoned areas in Seattle.

### Building Setbacks

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Building setbacks are the minimum distance that zoning regulations require between two structures or between a structure and the property line.

**Exhibit 4.3-1**  
Typical Existing Houses  
in Seattle (Seattle 2018)



**Exhibit 4.3-2**  
Recently Constructed Houses in  
Seattle that Maximize the Allowed  
Zoning Envelope (Seattle 2018)



Incremental redevelopment in Seattle's single-family zones is ongoing and expected. Existing regulations allow construction of new detached single-family residences in single-family zones. New single-family residences that replace existing older ones typically maximize the size allowed under current Land Use Code regulations, which results in many new houses being larger than surrounding older residences. Newer houses often exhibit modern designs and different architectural characteristics than older structures. This type of development influences the aesthetic character of a neighborhood. The City does not require new development in single-family zones to go through Design Review.

By regulating the overall bulk of buildings through minimum setback requirements and limits on building height, density, floor area ratio (FAR), and lot coverage, the City can influence the overall aesthetic quality in a given location.

Maximum height and FAR limits both directly influence how intensive a development appears. We often describe this perceived intensity in terms of bulk and scale. Increases in FAR and height together create greater "bulk." For example, a tall, skinny building will occupy less of its building site and appear less "bulky" (although taller) than a relatively short building with the same FAR, even though both contain the same volume. Bulk is the qualitative visible composition and perceived shape of a structure's volume. Which form is preferable or perceived as more attractive is both subjective and dependent on the surrounding context. Visual scale, meanwhile, is the relationship of a building in terms of its size, height, and bulk to its surroundings. A building's scale is contextual in nature and affects how well it blends in with the neighborhood. Changes in scale can create aesthetic impacts if new development differs in bulk and scale from the surrounding neighborhood.

ADUs have been allowed citywide as part of a single-family residence or in the rear yard of a single-family-zoned lot since 1994 and 2010, respectively. ADUs exist throughout the study area and are compatible with the scale and urban form of Seattle's single-family zones. Exhibit 4.3-3 shows photographs of DADUs in Seattle. Exhibit 4.3-4 shows a visual representation of a typical existing single-family area, including detached single-family houses, ADUs, and other accessory structures.

### Floor Area Ratio

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Floor area ratio (FAR) is the ratio of a building's total square footage (floor area) to the size of the piece of land on which it is constructed. For example, if a building must adhere to 0.5 FAR, then the total square footage of the constructed building must be no more than half the area of the parcel itself. In other words, if the lot is 5,000 square feet, then the square footage of the building cannot exceed 2,500 square feet.

**Exhibit 4.3-3**  
DADUs in Seattle

Source: Sheri Newbold of live-work-play  
architecture (top). CAST Architecture  
(bottom).



**Exhibit 4.3-4** Visual Representation of Existing Conditions in a Single-Family Zone



## TREE CANOPY

Tree canopy provides aesthetic and health benefits to residents and contributes to the overall livability of communities. The Comprehensive Plan establishes goals and policies for the preservation and expansion of Seattle's tree canopy (Seattle 2017). See Section 4.2, Land Use, for a discussion of existing tree canopy cover and vegetation and potential impacts resulting from the alternatives.

### 4.3.2 Impacts

This section describes the potential aesthetic impacts from Alternatives 1, 2, and 3 and the Preferred Alternative in the study area. Given the large size of the study area, we primarily discuss aesthetic impacts qualitatively; however, we also developed and analyzed three-dimensional models to help visualize and evaluate the potential impacts of Land Use Code changes. We recognize that evaluating aesthetic impacts is subjective and can vary depending on an individual's perspectives and preferences. This section analyzes the potential visual impacts from changes to the form of new development under each alternative in terms of height, bulk, and scale.

~~Alternatives 2 and 3~~ The action alternatives differ in the degree and focus of the proposed changes. Alternative 2 and the Preferred Alternative represents the broadest range of Land Use Code changes, which would allow the greatest flexibility for constructing ADUs and potentially create more extensive aesthetic impacts. Compared to Alternative 2 and the Preferred Alternative, Alternative 3 represents more modest Land Use Code changes that would result in fewer ADUs constructed and marginally fewer potential aesthetic impacts overall.

In general, the proposed Land Use Code changes under the action alternatives would result in creation of more ADUs compared to Alternative 1 (No Action). As described in Section 4.1, Housing and Socioeconomics, when compared to Alternative 1 (No Action), Alternative 2 could add about ~~1,440~~ 2,310 additional ADUs, ~~and~~ Alternative 3 could add about ~~1,210~~ 1,430 additional ADUs, and the Preferred Alternative could add about 2,460 additional ADUs throughout the study area between 2018 and 2027. This additional ADU production would result in a minor increase in the scale and intensity of development.

Under any alternative, development of new buildings could contribute new sources of light and glare from additional night lighting, higher

visibility of interior lighting through windows at night, and reflection from windows. Although these light sources would increase, none of these sources is expected to cause adverse aesthetic impacts because many of these types of lights already exist in the study area. As such, we do not discuss light and glare further in this document.

The specific elements of the proposed Land Use Code changes that would affect the aesthetic character of the study area include:

- Number of ADUs allowed on a lot
- Minimum lot size for a DADU
- Off-street parking requirements
- Maximum size
- Maximum height
- Rear yard coverage limit
- Location of entries
- Roof features
- Maximum FAR limits

We did not consider the following proposed Land Use Code changes in our analysis of aesthetic impacts because they do not affect the aesthetic character of the study area: owner-occupancy requirements, household size, MHA requirements incentives for affordable housing, and predevelopment reduced development costs. No alternative contemplates a change to the overall lot coverage limit; therefore, we did not discuss it in this analysis.

## METHODOLOGY

As described in more detail in Appendix C, we used three-dimensional visual modeling to illustrate the potential changes to the scale and form of development in the study area. The simulations provide representative views of potential development changes under Alternatives 1, 2, and 3 and the Preferred Alternative on lots in single-family zones. For each alternative, we included multiple viewpoints using one representative neighborhood type (see the following exhibits).

To illustrate a range of typical conditions found across the study area, we created a hypothetical two-block scene consisting of 60 lots with seven distinct lot types. These lot types are based on actual lots found in representative locations in the study area and illustrate various lot sizes (ranging from 3,200 to 6,000 square feet), lot widths (ranging from 28 to 60 feet), and lot depths (ranging from 86 to 120 feet). One block includes

an alley, while the other does not, to illustrate varied frontage and vehicle access conditions. We also illustrate a corner lot condition where a rear yard abuts a side yard.

As a baseline for comparison, we illustrated the existing conditions in the model. While the two-block scene is hypothetical, the existing houses modeled are closely based on actual houses found in study area neighborhoods. We chose houses with a range of sizes and parking access conditions (e.g., detached and attached garages with alley access; detached and attached garages with front driveway access; driveway parking; or lots without off-street parking) to represent a realistic variety of conditions that are more or less conducive to adding ADUs. The baseline scenario shows ADUs at the approximate density they exist today.

For each alternative, we modeled two future scenarios: a 10-Year Scenario and a Full Build-Out Scenario. The 10-Year Scenario is based on the ADU production estimates described in Section 4.1, Housing and Socioeconomics, and is intended to illustrate realistic outcomes 10 years after implementing each alternative.<sup>1</sup> The 10-Year Scenario consists of lots with no changes, lots with new ADUs and no change to the main house, lots where a house is torn down and rebuilt without an ADU, and lots with both a new house and new ADU(s). The number of redeveloped lots and/or ADUs varies by alternative. The Full Build-Out Scenario is hypothetical and depicts the complete redevelopment of all lots with the largest possible main house and the maximum number of ADUs allowed. We do not expect this scenario to occur but include it here to illustrate the maximum scale of development allowed under each alternative. See Appendix C for additional details.

We included parked vehicles in the visual representations to illustrate approximately how the availability of on-street parking could vary across alternatives in the 10-Year and Full Build-Out scenarios. The vehicles shown are representative and does not directly correspond to the results of the parking analysis in Section 4.4 Parking and Transportation.

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<sup>1</sup> See Section 1.8 for a discussion of how we updated the methodology for calculating estimates of new ADUs and single-family demolitions since issuance of the Draft EIS.

## MODEL RESULTS

### Alternative 1 (No Action)

Under Alternative 1 (No Action), no Land Use Code changes would occur. Residential development would unfold over time that is consistent with the Seattle 2035 Comprehensive Plan and zoning regulations (as amended) (Seattle 2017). Existing houses on single-family lots would continue to be torn down and rebuilt and new ADUs would be constructed at their current rates.

However, Alternative 1 (No Action) would not result in significant aesthetic impacts beyond those analyzed in the Comprehensive Plan EIS (Seattle 2016). The current trajectory for the development of ADUs would continue, as would construction of new detached single-family houses under existing regulations. As described in Section 4.1 Housing and Socioeconomics, Alternative 1 (No Action) could result in about ~~1,890~~ 1,970 ADUs constructed and ~~2,610~~ 2,030 existing houses being torn down and rebuilt throughout the study area between 2018 and 2027. In our hypothetical two-block scene, this would result in the following development outcomes under the 10-Year Scenario:

- 2 lots with no ADUs where the main house is torn down and rebuilt
- 1 lot with a DADU where the main house is torn down and rebuilt
- 2 lots with an AADU where the main house is retained
- 1 lot with a DADU where the main house is retained
- 54 lots with no changes

Under the Full Build-Out Scenario, all lots in the two-block scene would redevelop based on the following assumptions:

- Maximized footprint of the main house on all lots based on allowed lot coverage while accommodating a DADU (where lot size allows) or an AADU and required off-street parking
- Maximized square footage of the main house on all lots, fully utilizing allowed building height
- Largest feasible DADU, where applicable

Exhibit 4.3-5 through Exhibit 4.3-7 show a plan view of development outcomes under Alternative 1 (No Action) under the Existing Conditions, 10-Year, and Full Built-Out scenarios. Exhibit 4.3-8 through Exhibit 4.3-13 are visual representations of Alternative 1 (No Action) under each scenario. Newly constructed ADUs are highlighted with orange roofs.

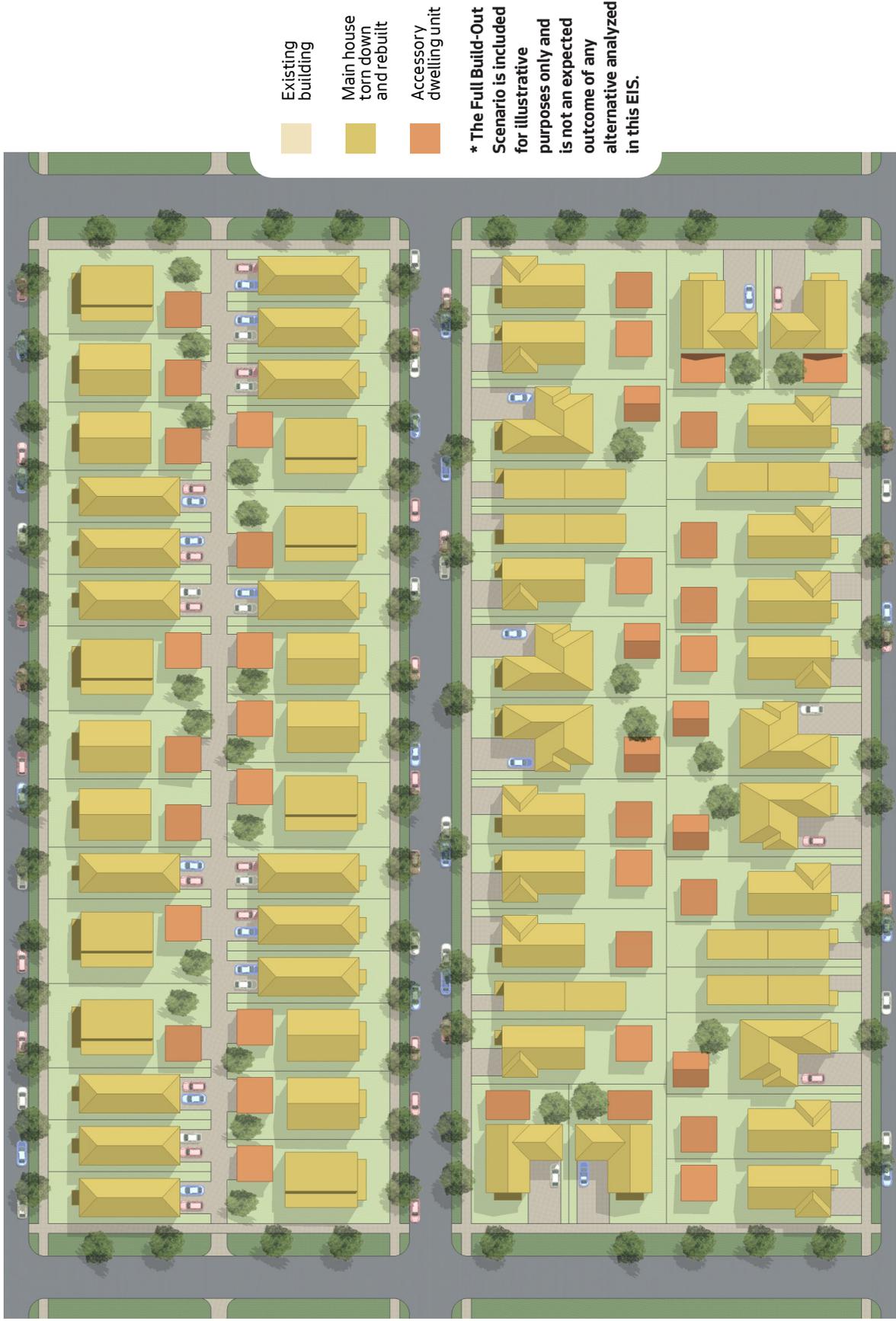
**Exhibit 4.3-5** Plan View of Development of Alternative 1 (No Action) under Existing Conditions



Exhibit 4.3-6 Plan View of Development Outcomes of Alternative 1 (No Action) in the 10-Year Scenario



**Exhibit 4.3-7** Plan View of Development Outcomes of Alternative 1 (No Action) in the Full Build-Out Scenario\*



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**Exhibit 4.3-8** Visual Representation of Development Outcomes in Alternative 1 (No Action) under Existing Conditions



**Exhibit 4.3-9** Visual Representation of Development Outcomes in Alternative 1 (No Action) in the 10-Year Scenario



**Exhibit 4.3-10** Visual Representation of Development Outcomes in Alternative 1 (No Action) in the Full Build-Out Scenario\*



**Exhibit 4.3-11** Visual Representation of Alternative 1 (No Action) under the Existing Conditions, 10-Year, and Full Build-Out Scenarios

Existing Conditions



10-Year Scenario



- Existing building
- Main house torn down and rebuilt
- Accessory dwelling unit

Full Build-Out Scenario\*

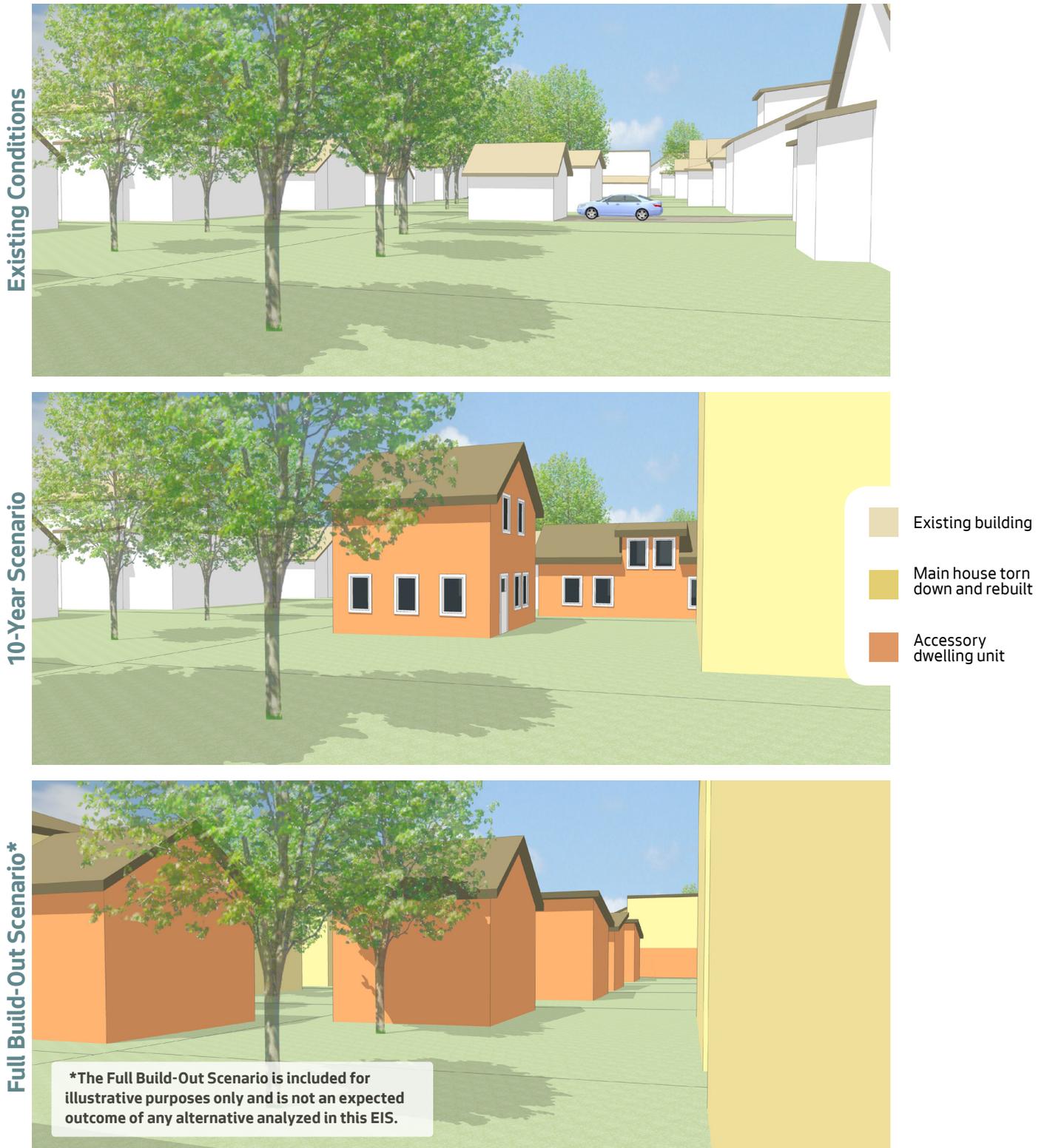


\*The Full Build-Out Scenario is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.

**Exhibit 4.3-12** Visual Representation of Alternative 1 (No Action) under the Existing Conditions, 10-Year, and Full Build-Out Scenarios



**Exhibit 4.3-13** Visual Representation of Alternative 1 (No Action) from a Rear Yard under the Existing Conditions, 10-Year, and Full Build-Out Scenarios



## Alternative 2

As described in Section 4.1, Housing and Socioeconomics, Alternative 2 would result in about ~~3,330~~ 4,280 ADUs constructed and ~~2,460~~ 1,800 existing main houses torn down and rebuilt throughout the study area between 2018 and 2027. Compared to Alternative 1 (No Action), Alternative 2 could result in ~~1,440~~ 2,310 additional ADUs constructed and ~~150~~ 230 fewer houses torn down and rebuilt. In the two-block scene, Alternative 2 would result in the following development outcomes under the 10-Year Scenario:

- 2 lots with no ADUs where the main house is torn down and rebuilt
- 1 lot with a DADU where the main house is torn down and rebuilt
- ~~4~~ 2 lots with an AADU where the main house is retained
- ~~4~~ 3 lots with a DADU where the main house is retained
- 1 lot with an AADU and a DADU where the main house is retained
- ~~54~~ 51 lots with no changes

Under the Full Build-Out Scenario, all lots in the two-block scene would redevelop based on the following assumptions:

- Maximized footprint of main house on all lots based on allowed lot coverage while accommodating a DADU
- Maximized square footage of the main house, with an AADU on its ground floor,<sup>2</sup> fully utilizing allowed building height
- Largest feasible DADU on all lots

Exhibit 4.3-14 through Exhibit 4.3-16 show a plan view of the development outcomes under Alternative 2 under the Existing Conditions, 10-Year, and Full Build-Out scenarios. Exhibit 4.3-17 through Exhibit 4.3-22 are visual representations of Alternative 2 under each scenario. Newly constructed ADUs are highlighted with orange roofs

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<sup>2</sup> Although we concluded in the housing analysis that most AADUs would be constructed in the basements of existing houses, we assume in this aesthetics analysis that any AADU would be constructed as an addition to the main house. This allows us to consider scenarios with the highest level of anticipated change to the visual environment.

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**Exhibit 4.3-14** Plan View of Development of Alternative 2 under Existing Conditions



Exhibit 4.3-15 Plan View of Development Outcomes of Alternative 2 in the 10-Year Scenario

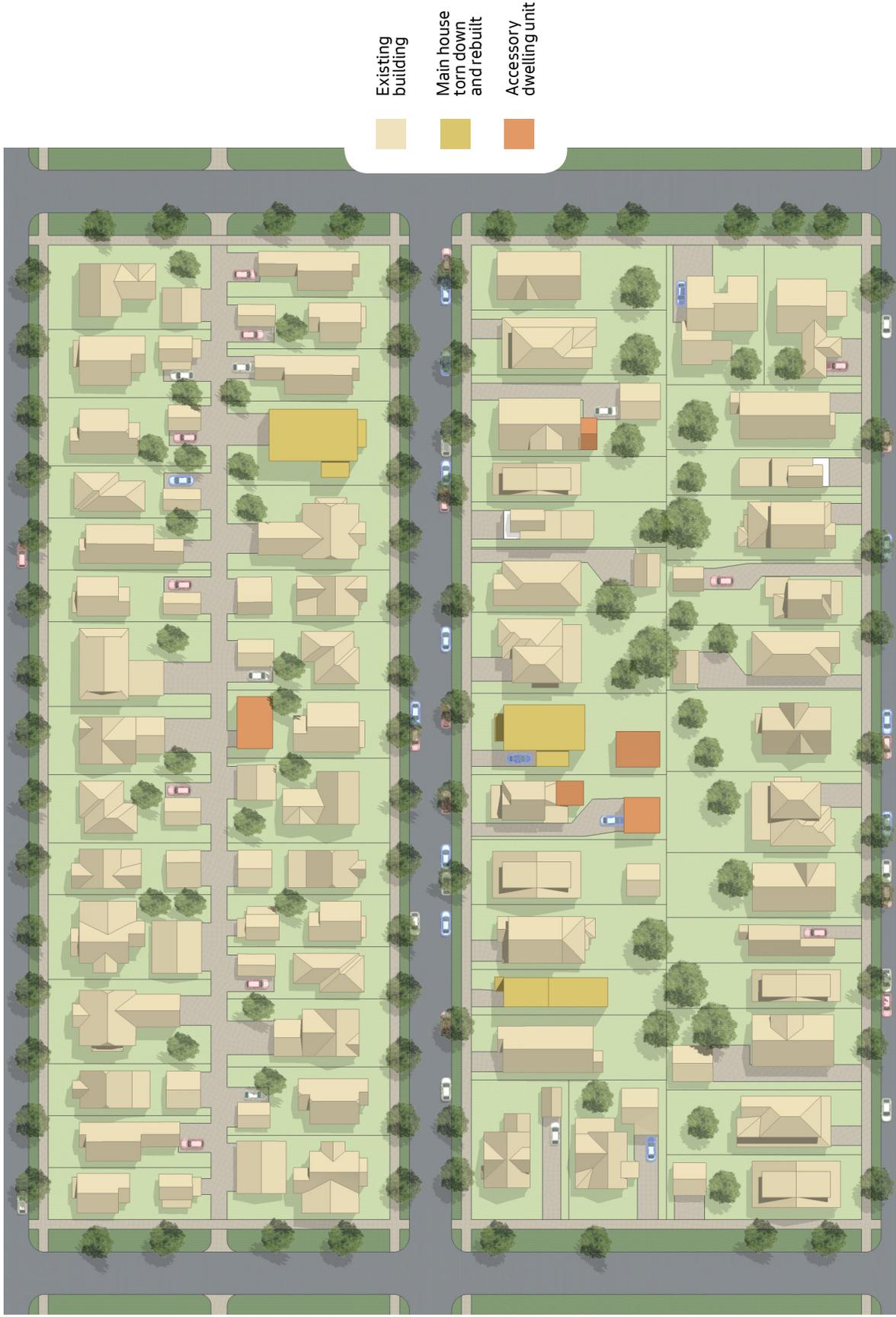
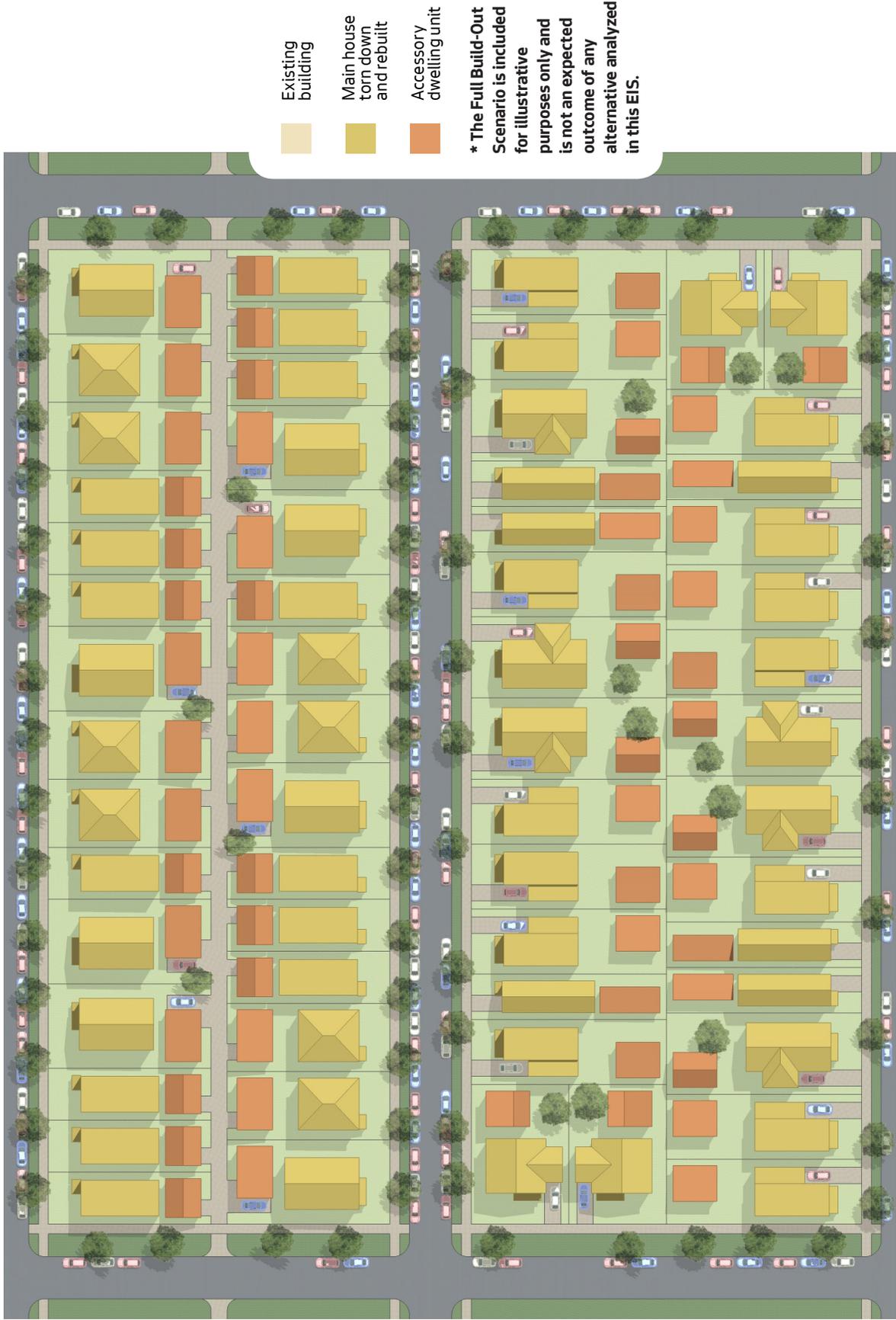


Exhibit 4.3-16 Plan View of Development Outcomes of Alternative 2 in the Full Build-Out Scenario\*



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**Exhibit 4.3-17** Visual Representation of Development Outcomes in Alternative 2 under Existing Conditions



Exhibit 4.3-18 Visual Representation of Development Outcomes in Alternative 2 in the 10-Year Scenario



**Exhibit 4.3-19** Visual Representation of Development Outcomes in Alternative 2 in the Full Build-Out Scenario\*



**Exhibit 4.3-20** Visual Representation of Alternative 2 under the Existing Conditions, 10-Year, and Full Build-Out Scenarios

Existing Conditions



10-Year Scenario



- Existing building
- Main house torn down and rebuilt
- Accessory dwelling unit

Full Build-Out Scenario\*



**\*The Full Build-Out Scenario is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.**

**Exhibit 4.3-21** Visual Representation of Alternative 2 under the Existing Conditions, 10-Year, and Full Build-Out Scenarios



**Exhibit 4.3-22** Visual Representation of Alternative 2 from a Rear Yard under the Existing Conditions, 10-Year, and Full Build-Out Scenarios

Existing Conditions

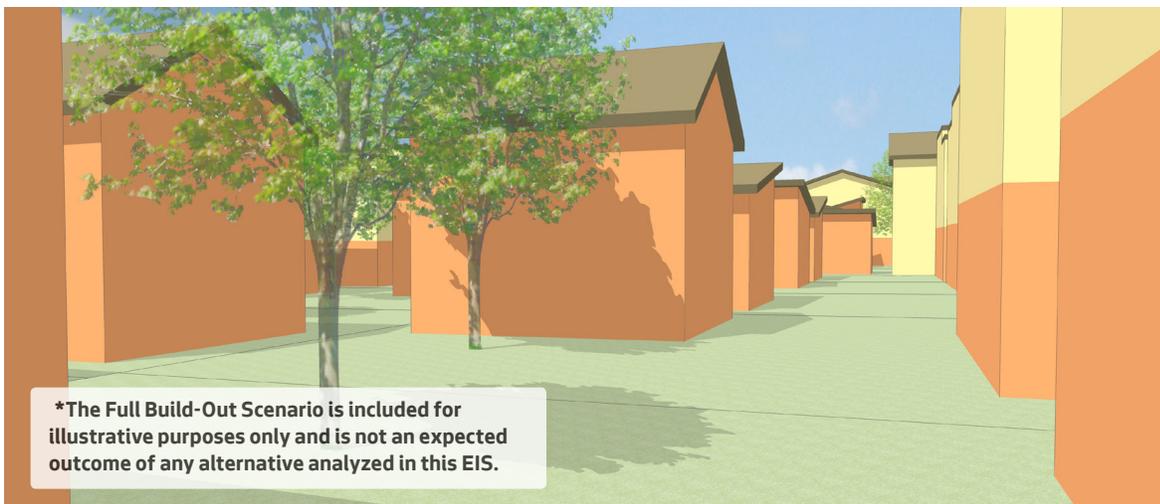


10-Year Scenario



- Existing building
- Main house torn down and rebuilt
- Accessory dwelling unit

Full Build-Out Scenario\*



\*The Full Build-Out Scenario is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.

### Alternative 3

In general, Alternative 3 seeks to encourage various housing types, including ADUs and smaller principal structures similar in scale to many existing houses in the study area. As a result, Alternative 3 would have fewer aesthetic impacts overall than Alternative 2 and the Preferred Alternative.

As described in Section 4.1, Housing and Socioeconomics, Alternative 3 could result in about ~~3,100~~ 3,400 ADUs constructed and ~~2,200~~ 1,670 existing houses torn down and rebuilt throughout the study area between 2018 and 2027. Compared to Alternative 1 (No Action), Alternative 3 could result in ~~1,210~~ 1,430 additional ADUs constructed and ~~410~~ 360 fewer houses torn down and rebuilt. In the two-block scene, this would result in the following development outcomes in the 10-Year Scenario:

- 1 lot with no ADUs where the main house is torn down and rebuilt
- 1 lot with a DADU where the main house is torn down and rebuilt
- 2 lots with AADUs where the main house is retained
- 2 lots with DADUs where the main house is retained
- 1 lot with both an AADU and a DADU where the main house is retained
- 53 lots with no changes<sup>3</sup>

Under the Full Build-Out Scenario, all lots in the two-block scene would redevelop based on the following assumptions:

- Maximized footprint of main house on all lots based on allowed lot coverage while accommodating a DADU and required off-street parking
- Maximized square footage of main house on all lots up to the maximum FAR limit, utilizing allowed building height as applicable
- Largest feasible AADU on the ground floor of the main house
- Largest feasible DADU on all lots

Exhibit 4.3-23 through Exhibit 4.3-25 shows a plan view of the development outcomes of Alternative 3 under the Existing Conditions, 10-Year, and Full Build-Out scenarios. Exhibit 4.3-26 through Exhibit 4.3-31 are visual representations of Alternative 3 under each scenario. Newly constructed ADUs are highlighted with orange roofs.

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<sup>3</sup> When we apply our ADU production estimates to the two-block scene, Alternative 3 results in ~~two~~ one additional lots with an ADUs compared to Alternative 2 and one fewer teardown. This reflects changes in profitability of different development outcomes under Alternative 3, partly because of the FAR limit that would apply to new development.

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**Exhibit 4.3-23** Plan View of Development of Alternative 3 under Existing Conditions



Exhibit 4.3-24 Plan View of Development Outcomes of Alternative 3 in the 10-Year Scenario



**Exhibit 4.3-25** Plan View of Development Outcomes of Alternative 2 in the Full Build-Out Scenario\*



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**Exhibit 4.3-26** Visual Representation of Development Outcomes in Alternative 3 under Existing Conditions



Exhibit 4.3-27 Visual Representation of Development Outcomes in Alternative 3 in the 10-Year Scenario



**Exhibit 4.3-28** Visual Representation of Development Outcomes in Alternative 3 in the Full Build-Out Scenario\*



Exhibit 4.3-29 Visual Representation of Alternative 3 under the Existing Conditions, 10-Year, and Full Build-Out Scenarios



**Exhibit 4.3-30** Visual Representation of Alternative 3 under the Existing Conditions, 10-Year, and Full Build-Out Scenarios

Existing Conditions



10-Year Scenario



- Existing building
- Main house torn down and rebuilt
- Accessory dwelling unit

Full Build-Out Scenario\*



\*The Full Build-Out Scenario is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.

**Exhibit 4.3-31** Visual Representation of Alternative 3 from a Rear Yard under the Existing Conditions, 10-Year, and Full Build-Out Scenarios

Existing Conditions



10-Year Scenario



- Existing building
- Main house torn down and rebuilt
- Accessory dwelling unit

Full Build-Out Scenario\*



\*The Full Build-Out Scenario is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.

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## **PREFERRED ALTERNATIVE**

As described in Section 4.1, Housing and Socioeconomics, the Preferred Alternative would result in about 4,430 ADUs constructed and 1,580 existing main houses torn down and rebuilt throughout the study area between 2018 and 2027. Compared to Alternative 1 (No Action), Alternative 2 could result in 2,460 additional ADUs constructed and 450 fewer houses torn down and rebuilt. In the two-block scene, Alternative 2 would result in the following development outcomes under the 10-Year Scenario:

- 1 lot with no ADUs where the main house is torn down and rebuilt
- 1 lot with a DADU where the main house is torn down and rebuilt
- 2 lots with an AADU where the main house is retained
- 3 lots with a DADU where the main house is retained
- 1 lot with an AADU and a DADU where the main house is retained
- 52 lots with no changes

Under the Full Build-Out Scenario, all lots in the two-block scene would redevelop based on the following assumptions:

- Maximized footprint of principal building on all lots, based on allowed lot coverage while accommodating a DADU and all required off-street parking
- Maximized square footage of principal unit on all lots or maximum allowed FAR, using allowed building height as applicable
- Largest feasible AADU on ground floor of the principal building on all lots
- Largest feasible DADU on all lots

Exhibit 4.3-32 through Exhibit 4.3-35 show a plan view of the development outcomes under the Preferred Alternative under the Existing Conditions, 10-Year, and Full Build-Out scenarios. Exhibit 4.3-36 through Exhibit 4.3-41 are visual representations of the Preferred Alternative under each scenario. Newly constructed ADUs are highlighted with orange roofs.

**Exhibit 4.3-32** Plan View of Development of the Preferred Alternative under Existing Conditions



**New in the FEIS**

Exhibit 4.3-32 is new  
in the Final EIS.

Existing  
building



**Exhibit 4.3-33** Plan View of Development Outcomes of the Preferred Alternative in the 10-Year Scenario



**Exhibit 4.3-34** Plan View of Development Outcomes of the Preferred Alternative in the Full Build-Out Scenario\*



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**Exhibit 4.3-35** Visual Representation of Development Outcomes in the Preferred Alternative under Existing Conditions



**Exhibit 4.3-36** Visual Representation of Development Outcomes in the Preferred Alternative in the 10-Year Scenario



**Exhibit 4.3-37** Visual Representation of Development Outcomes in the Preferred Alternative in the Full Build-Out Scenario\*



**Exhibit 4.3-38** Visual Representation of the Preferred Alternative under the Existing Conditions, 10-Year, and Full Build-Out Scenarios



**Exhibit 4.3-39** Visual Representation of the Preferred Alternative under the Existing Conditions, 10-Year, and Full Build-Out Scenarios



**Exhibit 4.3-40** Visual Representation of the Preferred Alternative from a Rear Yard under the Existing Conditions, 10-Year, and Full Build-Out Scenarios

Existing Conditions



10-Year Scenario



- Existing building
- Main house torn down and rebuilt
- Accessory dwelling unit

Full Build-Out Scenario\*



\*The Full Build-Out Scenario is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.

## IMPACTS OF ALTERNATIVE 1 (NO ACTION)

Under Alternative 1 (No Action), current Land Use Code regulations for development in single-family zones would remain unchanged. We anticipate the current rate of ADU production would continue. Compared to ~~Alternatives 2 and 3~~ the action alternatives, Alternative 1 (No Action) would result in more teardowns, more lots with large new houses, and fewer ADUs overall. Changes in aesthetics resulting from tearing down existing houses and rebuilding new houses would continue.

## IMPACTS OF ALTERNATIVE 2

Based on the results described in Section 4.1, Housing and Socioeconomics, we anticipate the following changes between 2018 and 2027:

- **Alternative 1 (No Action).** ~~1,890~~ 1,970 newly constructed ADUs and ~~2,610~~ 2,030 houses torn down and rebuilt
- **Alternative 2.** ~~3,330~~ 4,280 newly constructed ADUs and ~~2,460~~ 1,800 houses torn down and rebuilt

Compared to Alternative 1 (No Action), Alternative 2 would increase construction of ADUs and decrease the number of houses torn down and rebuilt throughout the city. Overall, we do not anticipate these changes would result in aesthetic impacts. In the hypothetical two-block scene, changes to lots due to teardowns or construction of new ADUs would be anticipated on nine percent of lots under Alternative 2. As shown in Exhibit 4.3-15, Exhibit 4.3-18, and the 10-year scenarios in Exhibit 4.3-20 through Exhibit 4.3-22, these development outcomes would not result in a fundamental change in visual character of neighborhoods where additional ADUs would be constructed. New ADUs would likely be dispersed throughout neighborhoods in the city and not be concentrated in large enough numbers to result in aesthetic impacts. If a concentration of ADUs did arise in a particularly area, localized aesthetic impacts could occur but would be minor. Further, Alternative 2 would decrease the number of teardowns of existing houses compared to Alternative 1 (No Action). This would help retain the overall aesthetic character of neighborhoods in the study area since new single-family houses erected following teardowns are often visually distinct from existing structures due to differences in architectural style, scale, and proportions.

Below we discuss the aesthetic impacts of Land Use Code changes in Alternative 2 at the level of an individual lot.

## Aesthetic Impacts: Two ADUs on One Lot

Current land use regulations allow a lot in a single-family zone to have an AADU or a DADU, but not both. Alternative 2 would allow both an AADU and a DADU on the same lot. This would not change the current allowable building envelope in single-family zones; it would modify only the number of units allowed within that envelope. Although we assumed in the housing analysis that most AADUs would be constructed in the basements of existing houses, we assumed in this aesthetics analysis that AADUs would be constructed as an addition to the main house. This allowed us to consider scenarios in which there would be the highest level of anticipated change to the visual environment.

As illustrated in Exhibit 4.3-41, the addition of both an AADU and a DADU on the same lot would add visual "bulk" to the lot, which would result in smaller yards and decrease the relative sense of openness. These impacts would be minimal as construction would occur behind the main house, out of view of the street and most viewers. Some visual impacts could occur from private property on the subject lot or its neighbors, where more unobstructed views to the DADU might be possible. Nevertheless, the number of lots with both an AADU and a DADU would be minimal compared to the total number of study area lots experiencing no change. Therefore, this Land Use Code change would not have an impact on the overall aesthetic character of neighborhoods in the study area.

Exhibit 4.3-41 Visual Representation of a Lot with Both an AADU and a DADU

Existing Conditions



10-Year Scenario



## Aesthetic Impacts: Development Standards

Alternative 2 contemplates several changes to the development standards that regulate the size and location of ADUs. This section illustrates and evaluates the potential aesthetic impacts of the following development standards under each alternative:

- Minimum lot size for DADUs
- Maximum size of AADUs and DADUs
- Maximum height for DADUs
- Maximum rear yard coverage limit
- Height limit exceptions for roof features

### Minimum lot size

In Alternative 1 (No Action), only lots 4,000 square feet in area and larger can have a DADU.<sup>4</sup> Under Alternative 2, the minimum lot size on which an ADU could be constructed would be reduced to 3,200 square feet. The hypothetical two-block scene includes about 20 lots between 3,200 and 3,999 square feet. The primary aesthetic impact of lowering the minimum lot size would be an increase in visual bulk and scale on lots that cannot have a DADU under current regulations. Because houses on lots under 4,000 square feet tend to be smaller, it's also possible that DADUs on such lots would be more visible from the street when compared to larger lots. However, other development standards, such as maximum lot coverage limits, would continue to regulate the location and scale of DADUs. On lots under 4,000 square feet, the maximum lot area that could be covered (equal to 1,000 square feet plus 15 percent of the lot area) would limit the size of DADUs or, in some cases, preclude their construction altogether.

### Maximum Gross Floor Area

Current regulations limit the size of AADUs to 1,000 gross square feet and DADUs to 800 gross square feet. In both cases, floor area in garage and storage areas counts against the floor area limits. Under Alternative 2, all ADUs would be subject the same gross floor area limit: 1,000 square feet, exclusive of garage and storage areas. As illustrated in Exhibit 4.3-42 Alternative 2 would therefore result in larger DADUs than allowed under Alternative 1 (No Action). The primary aesthetic impacts would result from the greater bulk and scale of DADUs on lots in a single-family zone. In

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<sup>4</sup> Conversion of an existing accessory structure to a DADU is allowed on lots under 4,000 square feet.

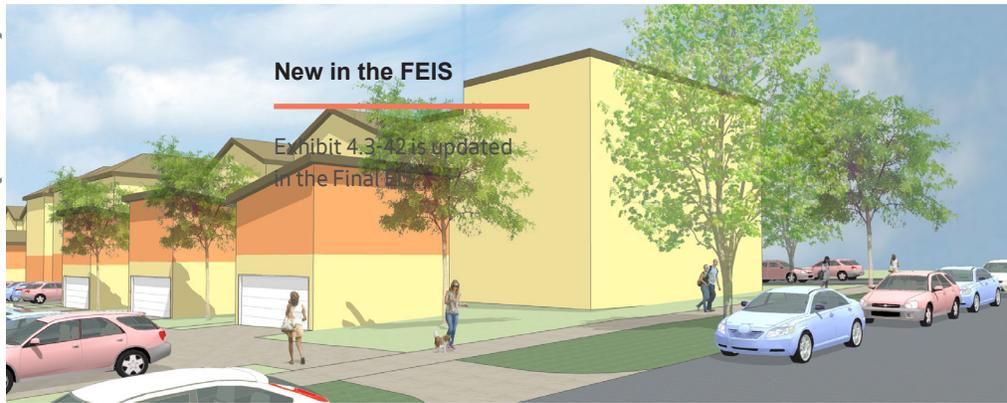
areas with a regular pattern of garages and other accessory structures in rear yards, larger DADUs allowed under Alternative 2 could stand out as less consistent with the established context. Other impacts could include a decrease in the amount of open space and landscaped areas on a lot and elimination of off-street parking if those portions of a lot previous used for parking are used to construct a larger DADU.<sup>5</sup>

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5 Under all alternatives, off-street parking would continue to be required for the principal dwelling unit, and this required parking space cannot be eliminated to construct an ADU.

**Exhibit 4.3-42** Visualization of the Largest Allowed DADU on a 5,200-Square-Foot Lot under Alternatives 1, 2, and 3 and the Preferred Alternative

Alternative 1 (No Action)



Alternative 2



Alternative 3



Preferred Alternative



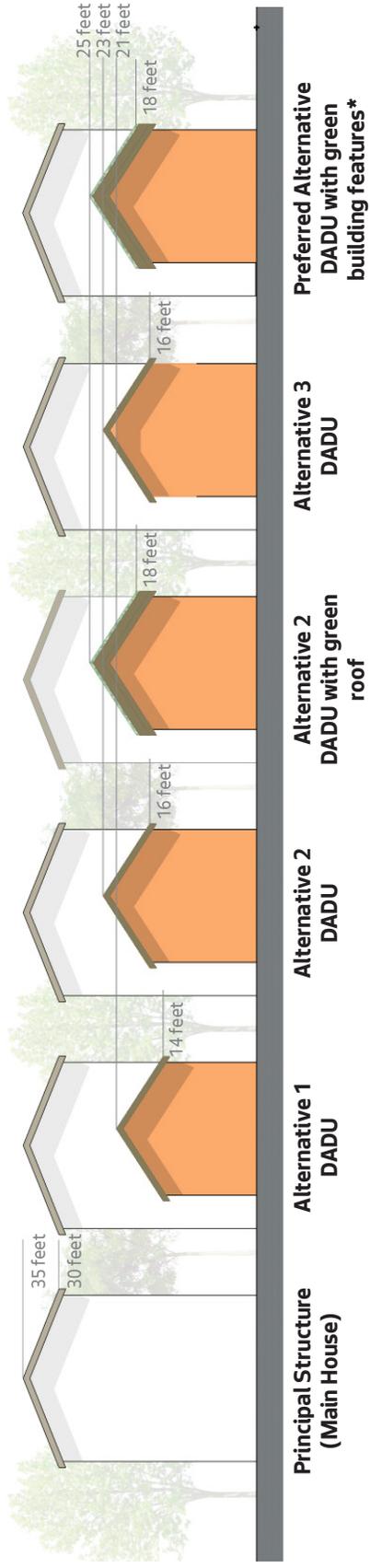
### Maximum Height

The aesthetic impact of taller buildings would vary depending on an area's existing urban form and the magnitude of change compared to existing limits. Under current regulations, the maximum height limit for DADUs varies by the width of its lot and ranges from between 15 to 23 feet (Exhibit 4.3-43). Alternative 2 would add a few feet to these height limits. The most pronounced contrast of these changes would be for lots that are 50 feet wide or more. The height limit for a DADU with a pitched roof on these lots would be 25 feet. On lots less than 30 feet wide, DADUs with pitched roofs would be subject to a height limit of 17 feet. On all but the narrowest lots, DADUs with shed or butterfly roofs would be subject to lower maximum height limits than those with pitched roofs. Exhibit 4.3-43 shows the maximum height allowed for a DADU on any lot type (i.e., the maximum height limit for lots greater than 50 feet in width). On narrower lots, lower maximum height limits apply.

Minor aesthetic impacts would result from taller DADUs. Combined with an increase in the maximum gross floor area limit, taller DADUs under Alternative 2 would create an increase in bulk and scale. However, because building heights would increase by 3 feet at most, we anticipate aesthetic impacts would be minimal.

Development of taller structures could increase the potential for shade and shadows on adjacent properties and rights-of-way. However, due to the slight increases in height limits under Alternative 2, impacts from shading would be minimal. In addition, building setbacks would still apply, alleviating shadowing of adjacent properties.

**Exhibit 4.3-43** Illustration of Maximum Height Allowed under Each Alternative on Lots Greater than 15 Feet in Width



Note Lot sizes are not drawn to scale.

\*Preferred Alternative with or without green building features is identical to Alternative 2

**New in the FEIS** Exhibit 4.3-43 is updated in the Final EIS.

Increasing the DADU height limit could have different effects in a flat area compared to an area with topographic variation. Exhibit 4.3-44 shows the effect of increased height when viewed along an alley where a DADU is on the downhill side of the block. Based on the lot width, the DADU can be one foot higher under Alternative 2 compared to Alternative 1 (No Action).

**Exhibit 4.3-44** Visual Representation from an Alley of a DADU on a Sloping Lot



Exhibit 4.3-44 is new in the Final EIS.

Similarly, we can examine the effects of different height limits for a DADU on the uphill side of a sloping area. Exhibit 4.3-45 shows a view from the street.

**Exhibit 4.3-45** Visual Representation from the Street of a DADU on a Sloping Lot

Alternative 1 (No Action)



Alternative 2



Finally, Exhibit 4.3-46 shows a visualization from a rear yard of a DADU on a neighboring, uphill lot.

**Exhibit 4.3-46** Visual Representation from a Rear Yard of a DADU on a Sloping Lot

Alternative 1 (No Action)



Alternative 2



Exhibit 4.3-44 is new in the Final EIS.

Exhibit 4.3-45 is new in the Final EIS.

### Rear Yard Coverage

Current regulations limit coverage of a rear yard to no more than 40 percent. The rear yard coverage limit applies to DADUs and other accessory structures, like a garage or shed.

Alternative 2 would allow 20-percent more coverage of a rear yard for a one-story DADU. (Accessory structures other than the DADU would remain limited to 40-percent coverage.) The aesthetic impacts would translate to less open space in rear yards and greater visual bulk. By limiting the additional coverage to DADUs less than 15 feet tall, the increase in rear yard coverage could result in more DADUs that are relatively shorter and wider than under Alternative 1 (No Action). Vegetation and tree canopy could decrease if property owners choose to eliminate landscape features to construct DADUs.

### Roof Features

Currently, no exceptions to the maximum height limit for DADUs are allowed for roof features. Alternative 2 would allow height limit exceptions for dormers, skylights, and other projections that add additional interior space. These roof features would be subject to the provisions applicable to single-family houses, such as size limits and location. For example, features that project from a roof would be limited to 30 percent of the roof area and subject to width and separation requirements. Impacts to aesthetics would be minimal as the increase in height allowed for roof features would be minor.

### Maximum Floor Area Ratio

Currently, development in single-family zones is not subject to a FAR limit. Instead, the scale and location of new houses in single-family zones are governed by yard requirements, a maximum height limit, and an overall lot coverage limit. Under Alternatives 1 and 2, these development standards would continue to determine the size of the allowed building envelope on a lot. No impacts on aesthetics are anticipated.

## IMPACTS OF ALTERNATIVE 3

The aesthetics impacts from Alternative 3 would be very similar, but slightly less than, those described under Alternative 2. As described above, under the 10-Year Scenario, the following changes could be anticipated:

- **Alternative 1 (No Action).** ~~1,890~~ 1,970 newly constructed ADUs and ~~2,610~~ 2,030 houses torn down and rebuilt
- **Alternative 3.** ~~3,100~~ 3,400 newly constructed ADUs and ~~2,200~~ 1,430 houses torn down and rebuilt

When compared to Alternative 1 (No Action), Alternative 3 would increase construction of ADUs and decrease teardowns throughout the city; however, this is not anticipated to result in aesthetic impacts. In the hypothetical two-block scene, changes would be anticipated on 12 percent of lots. As shown

for the 10-year scenario on Exhibits 4.3-16 to 4.3.20, these changes would not result in a fundamental variation of the land use form of neighborhoods in which additional ADUs would be constructed. New ADUs would be dispersed throughout neighborhoods in the city and would not be concentrated in large enough numbers to result in aesthetic impacts. Further, Alternatives 3 would decrease the number of teardowns of existing houses, which would help retain the overall aesthetic character of neighborhoods in the study area.

Below we discuss the aesthetic impacts of Land Use Code changes in Alternative 3 at the level of an individual lot.

### **Aesthetic Impacts: Two ADUs on One Lot**

Under Alternative 3, an AADU and a DADU would be allowed on the same lot or a lot could have two AADUs. The aesthetic impacts of constructing additional ADUs under Alternative 3 would be very similar to, but slightly less than, Alternative 2. Relative to Alternative 2, Alternative 3 would result in reduced aesthetic impacts because fewer ADUs would be constructed. Alternative 3 would allow a lot to have two AADUs within the same building envelope, which would not result in aesthetic impacts.

### **Aesthetic Impacts: Development Standards**

~~The action alternatives~~ Alternative 3 contemplates several changes to the development standards that regulate the size and location of ADUs. This section illustrates and evaluates the potential aesthetic impacts of the following development standards under each alternative:

- Minimum lot size for DADUs
- Maximum size of AADUs and DADUs
- Maximum height for DADUs
- Maximum rear yard coverage limit
- Height limit exceptions for roof features

#### **Minimum Lot Size**

As both Alternative 2 and 3 would reduce the minimum lot size to 3,200 square feet, the impacts under Alternative 3 would be the same as those described under Alternative 2.

#### **Maximum Gross Floor Area**

Current regulations limit the size of AADUs to 1,000 gross square feet and DADUs to 800 gross square feet. In both cases, floor area in garage and

storage areas counts against the floor area limits. Like Alternative 2, AADUs and DADUs would be subject to the same gross floor area limit under Alternative 3 (1,000 square feet), but garage and storage areas would count toward this limit. For AADUs, this would be the same as current regulations, but slightly smaller than Alternative 2, where the floor area limit excludes garage and storage areas. As illustrated in Exhibit 4.3-21, for DADUs, Alternative 3 would represent an increase over the current 800-square-foot limit but be a slight reduction from Alternative 2 because garage and storage areas would be counted toward the limit. Alternative 3 would therefore result in slightly greater bulk and scale impacts than Alternative 1 (No Action) and slightly lesser bulk and scale impacts than Alternative 2.

### **Maximum Height**

Like Alternative 2, Alternative 3 would also increase the maximum height limits for DADUs. However, Alternative 3 would not allow 1 to 2 additional feet of height for DADUs that met green roof standards. Therefore, the impacts would be marginally less than those described under Alternative 2.

### **Rear Yard Coverage**

Since both Alternative 2 and 3 would allow 20-percent more coverage of a rear yard for a one-story DADU, the impacts under Alternative 3 would be the same as those described under Alternative 2.

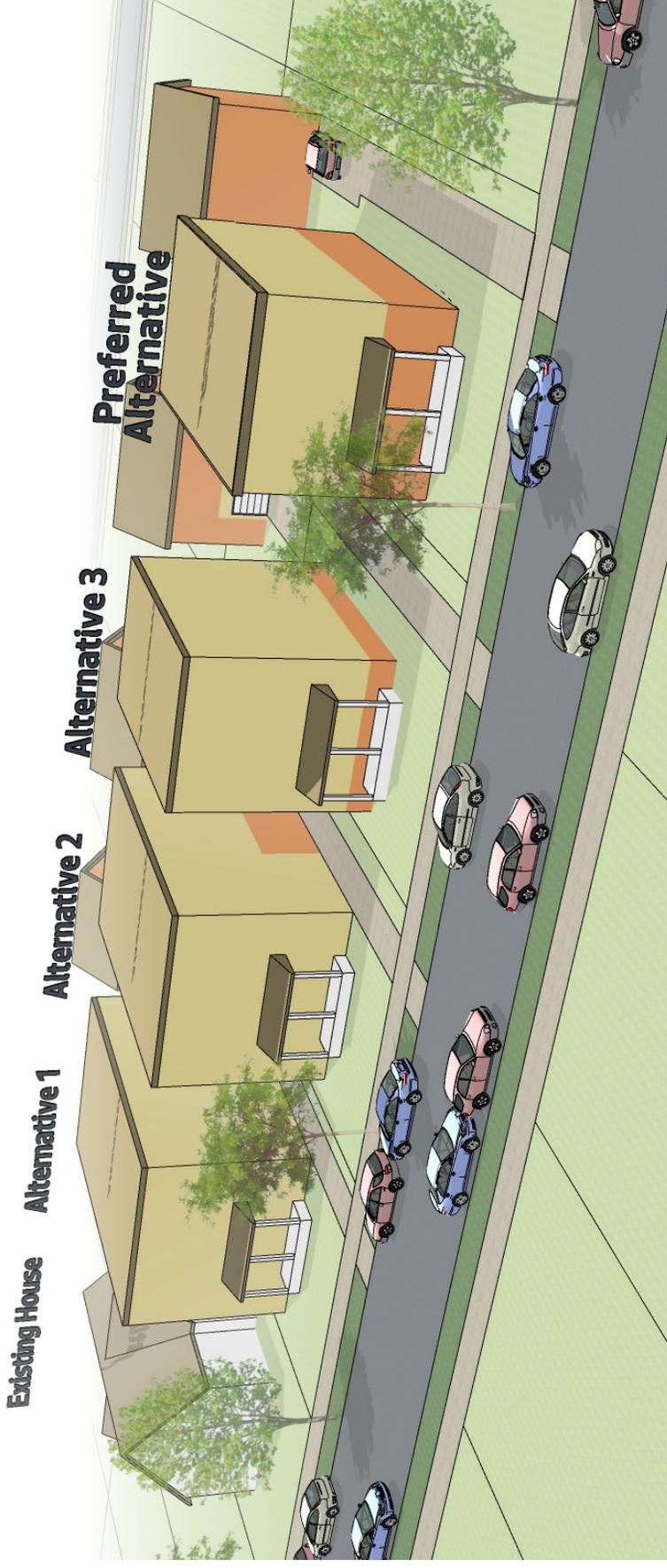
### **Roof Features**

Since both Alternative 2 and 3 would allow height limit exceptions for roof features, the impacts under Alternative 3 would be the same as those described under Alternative 2.

### **Maximum Floor Area Ratio**

Currently, development in single-family zones is not subject to a FAR limit. Instead, the scale and location of new houses in single-family zones are governed by yard requirements, a maximum height limit, and an overall lot coverage limit. Under Alternative 3, a FAR limit would apply to development in single-family zones. New residences (main houses) would be subject to a FAR limit of 0.5 or 2,500 square feet (whichever is greater). On a 6,000-square-foot lot, for example, this would limit the size of a new house to 3,000 square feet; on lots under 5,000 square feet, the size limit of 2,500 square feet would apply. Below-grade floor area and floor area in a DADU would not count toward the FAR limit. On lots where existing development exceeded the FAR or 2,500-square-foot limits, a property owner would be able to convert existing space to an AADU and add a DADU subject to the size and owner-occupancy standards above.

**Exhibit 4.3-47** Illustration of How the Maximum FAR Limit Affects House Size under Each Alternative



**New in the FEIS** Exhibit 4.3-47 is updated in the Final EIS.

As illustrated in Exhibit 4.3-47, in general, implementing a FAR limit would tend to reduce the size of new houses and reduce their aesthetic impacts to bulk and scale compared to both Alternative 1 (No Action) and Alternative 2. The analysis described in Section 4.1, Housing and Socioeconomics, suggests that limiting FAR might encourage creation of ADUs because below-grade and DADU floor area would be exempt from FAR calculations. While our estimate of ADU production was lower under Alternative 3 than under Alternative 2, to the extent the FAR limit would encourage marginally more DADUs specifically, there could be impacts on bulk and scale on single-family-zoned lots compared to Alternative 2, which would allow larger residences and have no FAR limit. However, our analysis also found that fewer teardowns would occur under Alternative 3 compared to Alternative 1 (No Action) and Alternative 2. This would reduce the aesthetic impacts of Alternative 3 relative to Alternatives 1 and 2 because more existing houses would be preserved rather than torn down and rebuilt as larger structures.

## **IMPACTS OF THE PREFERRED ALTERNATIVE**

The aesthetics impacts from the Preferred Alternative would be very similar, but slightly greater than, those described under Alternative 2. As described above, under the 10-Year Scenario, the following changes could be anticipated:

- **Alternative 1 (No Action).** 1,970 newly constructed ADUs and 2,030 houses torn down and rebuilt
- **Preferred Alternative.** 4,430 newly constructed ADUs and 1,580 houses torn down and rebuilt

Compared to Alternative 1 (No Action), the Preferred Alternative would increase construction of ADUs and decrease teardowns throughout the city; however, this is not anticipated to result in aesthetic impacts. In the hypothetical two-block scene, we anticipate changes on 12 percent of lots. As shown for the 10-year scenario on Exhibits 4.3-16 to 4.3-20, these changes would not result in a fundamental variation of the land use form of neighborhoods in which additional ADUs would be constructed. New ADUs would be dispersed throughout neighborhoods in the city and would not be concentrated in large enough numbers to result in aesthetic impacts. Further, the Preferred Alternative would decrease the number of teardowns of existing houses, which would help retain the overall aesthetic character of neighborhoods in the study area.

Below we discuss the aesthetic impacts of Land Use Code changes for the Preferred Alternative at the level of an individual lot.

### **Aesthetic Impacts: Two ADUs on One Lot**

Under the Preferred Alternative, an AADU and a DADU would be allowed on the same lot or a lot could have two AADUs; however, a second ADU can only be added if a lot has been in the same ownership for at least one year. The aesthetic impacts of constructing additional ADUs under the Preferred Alternative would be very similar to, but slightly greater than, Alternative 2. Relative to Alternative 2, the Preferred Alternative would result in increased aesthetic impacts because slightly more ADUs would be constructed. The Preferred Alternative would allow a lot to have two AADUs within the same building envelope, which would not result in aesthetic impacts.

### **Aesthetic Impacts: Development Standards**

The Preferred Alternative contemplates several changes to the development standards that regulate the size and location of ADUs. This section illustrates and evaluates the potential aesthetic impacts of the following development standards under each alternative:

- Minimum lot size for DADUs
- Maximum size of AADUs and DADUs
- Maximum height for DADUs
- Maximum rear yard coverage limit
- Height limit exceptions for roof features

#### **Minimum Lot Size**

All action alternatives would reduce the minimum lot size to 3,200 square feet. Therefore, the impacts under the Preferred Alternative would be the same as those described under Alternative 2.

#### **Maximum Gross Floor Area**

The maximum gross floor area allowed under the Preferred Alternative is the same as described under Alternative 2. Therefore, the impacts under the Preferred Alternative would be the same as those described under Alternative 2.

#### **Maximum Height**

The maximum height allowed under the Preferred Alternative is the same as described under Alternative 2, though additional height would be allowed not only for green roofs but various other green building

strategies. The impacts under the Preferred Alternative would be the same as those described under Alternative 2.

### **Rear Yard Coverage**

Like Alternatives 2 and 3, the Preferred Alternative would allow 60 percent rear yard coverage for a DADU with total height no more than 15 feet. However, under the Preferred Alternative, limitations on tree removal would apply for development resulting in rear yard coverage above 40 percent. The aesthetic impacts would therefore be slightly less than those described for Alternatives 2 and 3 because additional trees would be preserved.

### **Roof Features**

Since all action alternatives would allow height limit exceptions for roof features, the impacts under the Preferred Alternative would be the same as those described under Alternative 2.

### **Maximum Floor Area Ratio**

Like Alternative 3, the Preferred Alternative would implement a maximum FAR limit. Under current rules, yard requirements, maximum height, and maximum lot coverage together determine how large a single-family house can be. Under the Preferred Alternative, development in single-family zones would be subject to an FAR limit of 0.5 or 2,500 square feet, whichever is greater.

Both Alternative 3 and the Preferred Alternative would exempt certain floor area from counting towards the maximum FAR limit. Like Alternative 3, the Preferred Alternative would exempt below-grade floor area. But where Alternative 3 would also exempt floor area in a DADU, the Preferred Alternative would exempt floor area in any ADU, whether within the main house or in a detached structure. Exempting all ADU floor area avoids incentivizing AADUs located in basements, where the quality of living space can be inferior.

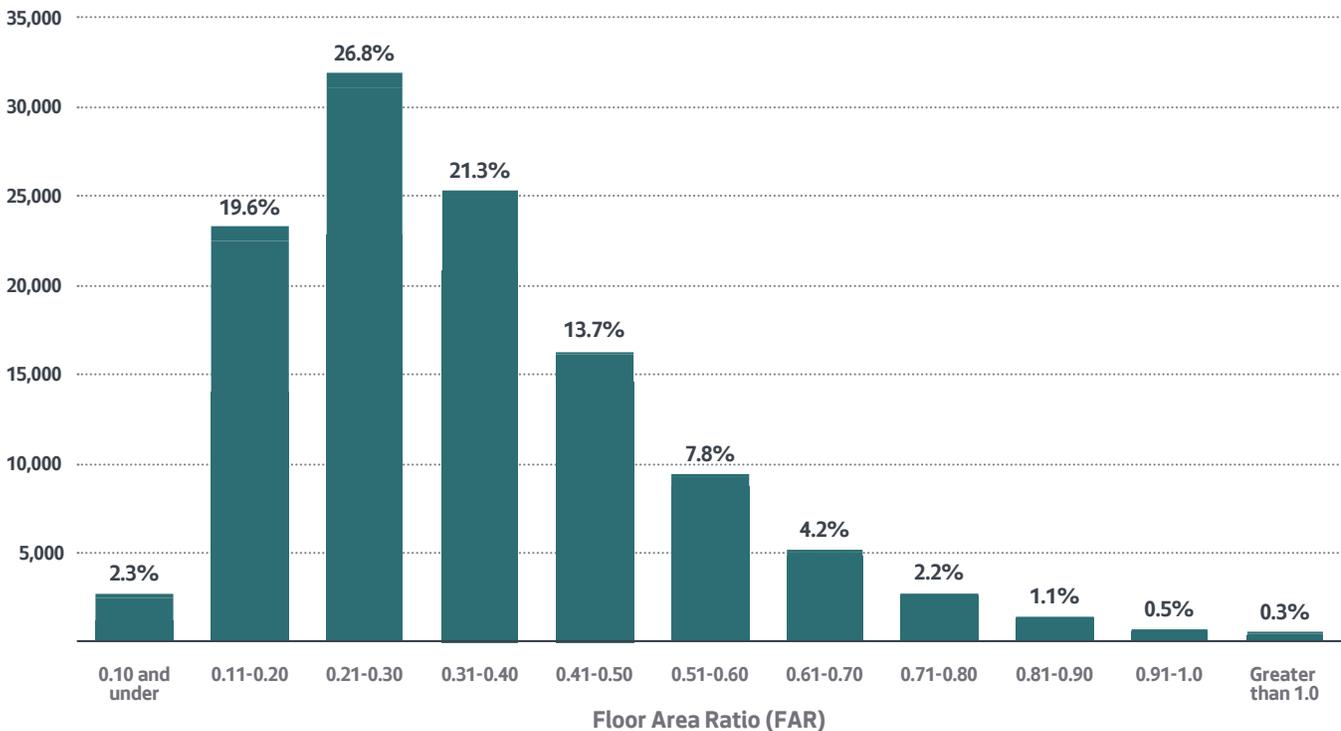
Compared to Alternative 1 (No Action) and Alternative 2, the maximum FAR limit in the Preferred Alternative would result in new houses smaller in scale and more compatible with existing development. Impacts to height, bulk, and scale would therefore be less than under Alternatives 1 and 2, where new structures on most lots can achieve an FAR greater than 1.0. We also expect the FAR limit would reduce demolitions of single-family homes under the Preferred Alternative compared to Alternative

1 (No Action), further lessening aesthetic impacts as more existing structures would remain.

The aesthetic impacts of the FAR limit under the Preferred Alternative would resemble those described under Alternative 3. Because all ADU floor area would be exempt from FAR calculations, and because the Preferred Alternative would allow two AADUs within the main house, the largest possible structure under the Preferred Alternative would be slightly greater than under Alternative 3.

Lots in the study area where existing development exceeds the maximum FAR limit would be nonconforming with respect to this development standard. A property owner could expand their existing development by constructing a DADU; creating an AADU as an addition to the house; or converting existing space into an AADU, thereby reducing the lot's chargeable floor area. Exhibit 4.3-48 shows the share of lots in Seattle's single-family zones according to an estimate of their FAR based on existing development.

**Exhibit 4.3-48** Floor Area Ratio of Lots in Single-Family Zones Based on Existing Development



**New in the FEIS** Exhibit 4.3-48 is new in the Final EIS.

While about 16 percent of lots have an estimated FAR above 0.50, in some cases existing development is under 2,500 square feet. Exhibit 4.3-49 shows the number of lots in single-family zones that would be nonconforming with respect the maximum FAR limit under the Preferred Alternative.

**Exhibit 4.3-49** Lots in Single-Family Zones with Existing Development above 0.5 FAR or 2,500 Square Feet

Zone	Percentage of nonconforming lots
SF 5000	11%
SF 7200	3%
SF 9600	2%
<b>Total</b>	<b>9%</b>

**New in the FEIS**

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Exhibit 4.3-49 is new in the Final EIS.

### 4.3.3 Mitigation Measures

No significant adverse impacts on land use are anticipated; therefore, no mitigation measures are proposed.

### 4.3.4 Significant Unavoidable Adverse Impacts

Under all alternatives, increased development on lots in single-family zones would occur in the study area, leading to a general increase in building heights and development intensity over time. This transition is an unavoidable and expected characteristic of urban populations and employment growth. Alternatives 2 and 3 and the Preferred Alternative would further this trend by creating additional development capacity and incentives that could accelerate the development of taller, more intense ADUs in the study area. Alternatives 2 and 3 and the Preferred Alternative would also result in a minor decrease in the rate of main houses being torn down and rebuilt. And, Alternative 3 and the Preferred Alternative would specifically reduce the size of the main house that could be constructed through the implementation of FAR limits. However, no significant unavoidable adverse impacts on aesthetics are anticipated as a result of the proposed Land Use Code changes.



## 4.4 Parking and Transportation

This section considers the impacts of the proposed Land Use Code changes on parking and transportation. We evaluated the potential parking impacts associated with the proposed Land Use Code changes by considering the existing availability of on-street parking relative to the expected increase in demand for on-street parking under each alternative.

The analysis of the potential impacts to transportation in the EIS for the Seattle 2035 Comprehensive Plan (City of Seattle 2015 and Seattle 2016) is incorporated by reference into this EIS. Section 3.7 of the Comprehensive Plan EIS thoroughly analyzed the potential impacts to transportation, including circulation and transit, from a projected growth of 70,000 households in the city through 2035, including approximately 8,400 households in areas outside of designated urban villages. Since the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS, we considered the potential impacts to the transportation network in the context of the changes analyzed in the Comprehensive Plan EIS.

### 4.4.1 Affected Environment

The following sections describe the existing transportation network and parking conditions in the study area.

#### **PARKING**

The City regulates both on-street and off-street parking. We regulate off-street parking by setting parking minimums and parking maximums in the Land Use Code that vary by land use and geography. We regulate on-street parking within the right-of-way by issuing on-street permits, charging by the hour, setting time

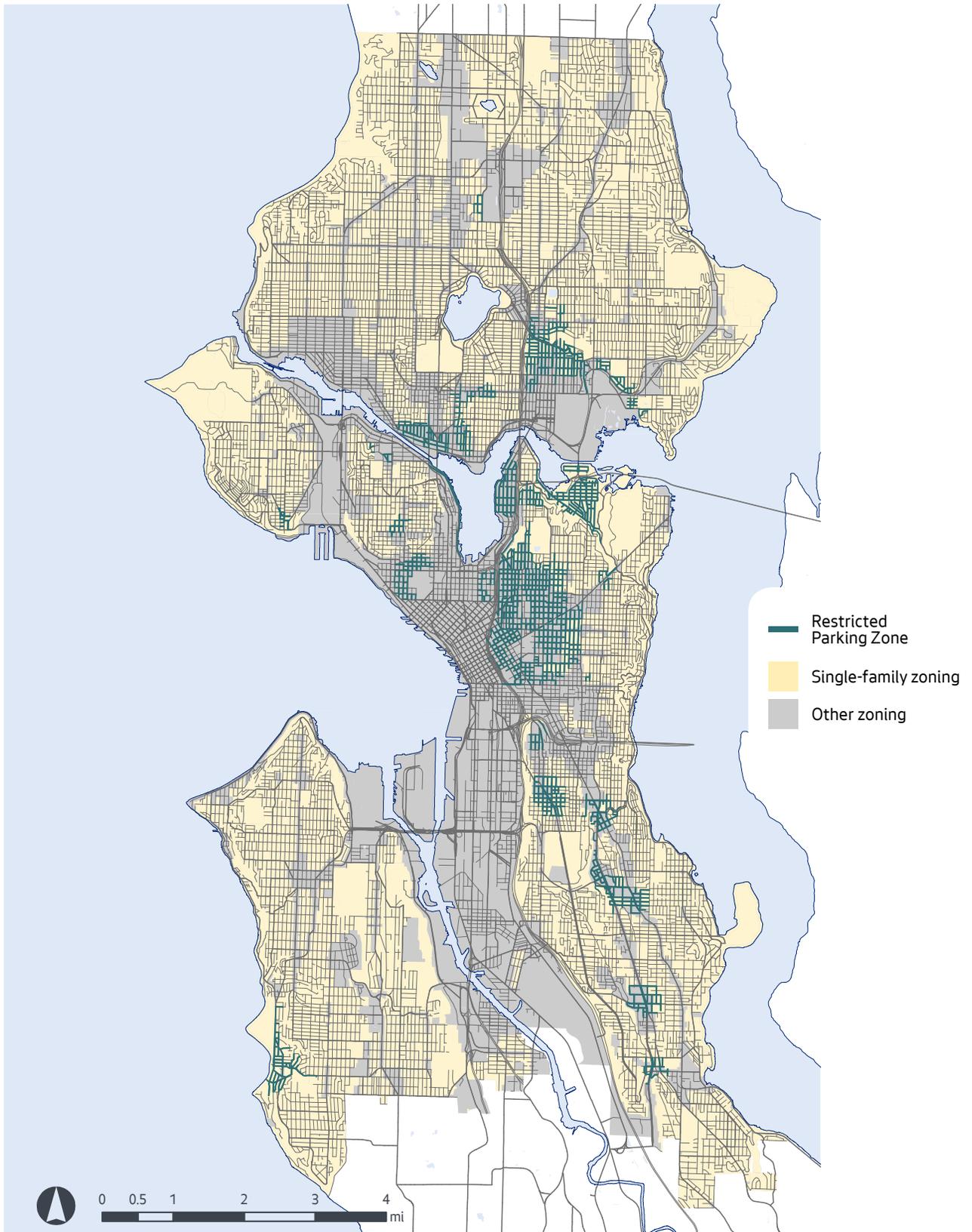
limits, and defining load zones. Seattle's target for on-street parking occupancy is 70-85 percent utilization. The primary way we manage parking in single-family zones is to designate Restricted Parking Zones (RPZ).

RPZs have time-limited parking available to the public. Residents with eligible addresses can apply for a permit to use the curb parking in their neighborhood without time limits. The RPZ program was created to help ease parking congestion in residential neighborhoods around significant demand generators, while balancing the needs of all people to be able to use the public streets. Exhibit 4.4-1 identifies RPZs in the study area. A new RPZ may be considered if an area meets the following criteria:

- There must be a significant degree of parking by non-residents:
  - » 75 percent of parking spaces must be occupied
  - » at least 35 percent of the occupied spaces must be occupied by vehicles not belonging to residents
- A "traffic generator" needs to be identified. This means a large institution (such as a hospital or university), a business district, or high capacity transit stop that creates significant demand for long-term parking which spills onto nearby residential streets.
- At least 10 contiguous blocks (or 20 blockfaces) must be affected by the traffic generator

SDOT also considers other strategies, such as adding parking on both sides of a street where possible, or utilizing transportation demand management programs to manage parking.

Exhibit 4.4-1 Restricted Parking Zones in the Study Area



### On-Street Parking Types

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Blocks with restricted parking impose limits on the amount of time that a vehicle can be parked in a space. Blocks with unrestricted parking do not have any imposed time limits. Blocks with no parking allowed do not allow parking for any vehicles.

## Parking Analysis Area

To understand the affected environment related to parking, and to inform the analysis of potential impacts from the proposed changes to the Land Use Code, we selected four study locations that provide a representative sample of neighborhoods where ADUs could be constructed. (See Appendix B for more details on the study locations.) We identified these four study locations by their general geographic location in the city: northeast, northwest, southeast, and southwest. The study locations represent a range of conditions found in single-family zones and include areas that vary by lot size; the presence of alleys, driveways, and sidewalks; and proximity to transit. We identified blocks with unrestricted parking, restricted parking, and no parking allowed. Since these areas represent a range of conditions and geography within Seattle, they provide a representative sample for the overall parking conditions throughout the study area. Our analysis focused on unrestricted parking spaces and their utilization. In residential areas, peak parking demand usually occurs overnight on a weeknight. As a result, we used weeknight overnight parking data to estimate parking utilization. For residential areas near neighborhood retail centers, peak on-street parking demand usually occurs on weekend afternoons.

This analysis relies on parking data previously collected by the Seattle Department of Transportation (SDOT) and data collected specifically for this project. For the northeast and northwest study locations, we collected data on parking supply and utilization for each block face generally using the methodology for data collection described in [Tip 117 \(SDOT SDCI 2011\)](#). SDOT collected parking supply and utilization data for the southeast and southwest study locations. While the study locations are not near large retail areas, we measured parking utilization on Saturdays to confirm that weekday overnight parking demand was the peak. The data we used for each of these geographic study locations included the following:

- **Northeast and Northwest.** We collected weekend overnight parking data on a Friday and a Saturday.
- **Southeast.** We used parking data collected for a 2016 SDOT parking analysis that did not include weekend parking data (SDOT 2016).
- **Southwest.** We used SDOT data collected in September 2017 on a Tuesday, Thursday, and Saturday (SDOT 2017b).

## Parking Supply

Parking supply is defined as the number of unrestricted on-street parking spaces. Exhibit 4.4-2 shows the number of blocks in each study location, the total supply of unrestricted on-street parking in the study location, and the average number of on-street parking spaces per block. Block length, driveways per block, and parking restrictions vary throughout the city. The average number of on-street parking spaces per block across all study locations is 22, ranging from 18 in the northwest study location to 27 in the southwest study location.

**Exhibit 4.4-2** Parking Supply in Each Study Location

Study location	Blocks	Total on-street parking spaces	Average number of on-street parking spaces per block
Northeast	108	2,403	22
Northwest	118	2,115	18
Southeast	14	327	23
Southwest	99	2,682	27
<b>Total</b>	<b>339</b>	<b>7,527</b>	<b>22</b>

## Parking Utilization

Parking utilization is defined as the number of parked vehicles, divided by the number of unrestricted on-street parking spaces. We calculated parking utilization per block by dividing the number of parked vehicles observed per block by the total number of spaces per block. We assumed that existing and future ADU residents park on street, and that there is some amount of parking utilized by visitors to the area. Exhibit 4.4-3 shows parking utilization rates in each study location for weekday and weekend observations. Weekend parking utilization data was not available for the southeast location. Where both datasets were available, weekday and weekend utilization rates in each study location were similar and varied by three to seven percentage points. Weekday utilization rates were higher in the northeast, northwest, and southeast study locations and lower in the southwest study location.

## Parking Terminology

**Parking supply** is the number of unrestricted on-street parking spaces.

**Parking utilization** is the number of parked vehicles observed, divided by the number of unrestricted on-street parking spaces.

**Parking availability** is the total number of parking spaces available per block.

**Exhibit 4.4-3 Existing Parking Utilization**

Study location	Weekday utilization	Weekend utilization
<b>Northeast</b>	53%	46%
<b>Northwest</b>	63%	57%
<b>Southeast</b>	78%	n/a <sup>1</sup>
<b>Southwest</b>	51%	54%
<b>Overall</b>	<b>56%</b>	<b>52%<sup>2</sup></b>

1 Weekend parking data was not collected.  
 2 Total excludes southeast study location.

Exhibit 4.4-4 shows weekday parking utilization rates per block for each study location. Overall, 57 percent of blocks across the study locations had utilization rates above 50 percent. Compared to others, the southeast study location had a higher share of blocks with utilization rates of at least 75 percent.

**Exhibit 4.4-4 Distribution of Parking Utilization Rates by Block during the Weekday**

Study location	Utilization			
	Less than 50%	50-75%	75-90%	More than 90%
<b>Northeast</b>	53%	37%	7%	3%
<b>Northwest</b>	31%	44%	17%	8%
<b>Southeast</b>	14%	36%	21%	29%
<b>Southwest</b>	49%	28%	13%	10%
<b>Overall</b>	<b>42%</b>	<b>37%</b>	<b>13%</b>	<b>8%</b>

### Parking Availability

Parking availability is defined as the total number of parking spaces available per block. We calculated parking availability by subtracting the estimated future parking demand from total on-street parking supply. The result represented the existing capacity for additional on-street parking per block. While parking utilization rates generally suggest the number of

parking spaces available, calculating parking availability is necessary to determine the potential impact of additional on-street parking demand. Exhibit 4.4-5 shows the percentage share of blocks in each study location by the number of available on-street parking spaces. Twenty-one percent of blocks in the southeast study location showed over capacity in our analysis, meaning that existing parking demand exceeds supply, the most of any study location. Across all study locations, 9.8 percent of parking spaces are available per block on average (including blocks at or over capacity).

**Exhibit 4.4-5** Percentage Share of Blocks by Number of Available Parking Spaces and Study Location

Study location	Average parking availability per block	Parking spaces available by block						
		Fewer than zero <sup>1</sup>	0	1-5	6-10	11-15	15-25	> 25
<b>Northeast</b>	10.6%	0%	2%	20%	30%	27%	20%	1%
<b>Northwest</b>	6.7%	1%	4%	46%	24%	20%	4%	1%
<b>Southeast</b>	5.1%	21%	7%	36%	21%	0%	7%	7%
<b>Southwest</b>	13.2%	4%	4%	25%	16%	10%	24%	16%
<b>Overall</b>	9.8%	2%	4%	31%	23%	18%	15%	6%

<sup>1</sup> Parking capacity on a block is estimated based on an assumed vehicle length and assumed buffers around fire hydrants, driveways, and at intersections. Occasionally, vehicle owners are able to fit more vehicles into a block than the estimated capacity, either legally or illegally. This demonstrates strong demand for parking on that block.

## TRANSPORTATION

The Transportation Element of the City’s Comprehensive Plan guides transportation investments to equitably serve the City. The Comprehensive Plan EIS describes existing transportation systems for automobiles, transit, bicycles and pedestrians in Seattle. Because the proposed Land Use Code changes evaluated in this EIS would affect an area included in the study area for the Comprehensive Plan EIS, we incorporate that information by reference in this EIS and summarize the pertinent details below. See Section 3.7 — Transportation, of the Comprehensive Plan EIS for details.

The City has also adopted plans for individual travel modes that include strategies and identify projects to improve transportation choices in the city. These include the Pedestrian Master Plan, the Bicycle Master Plan, and the Transit Master Plan. This section describes the existing transportation bicycle, transit, and vehicle network and describes transit services in Seattle.

## Pedestrian Network

The City's pedestrian network is composed of sidewalks, crosswalks, staircases, pedestrian bridges, curb ramps and trails. The 2017 Pedestrian Master Plan (PMP) is a 20-year blueprint to achieve the City's vision of Seattle as the most walkable and accessible city in the nation. The PMP states that Seattle has approximately 5,500 marked crosswalks, 33,600 blockfaces of sidewalks, and 27,300 curb ramps (SDOT 2014). The study area contains approximately 1,000 marked crosswalks, 9,700 blockfaces of sidewalks, and 10,000 curb ramps.

Across the study area, about 30 percent of blockfaces have unimproved sidewalks. These locations tend to be in northwest and northeast Seattle north of NE 85th Street, near the southwest city boundaries in the West Seattle Sector, in sections of the Duwamish Sector and the edges of the Southeast Seattle Sector. Exhibit 4.4-6 identifies blockfaces within the study area that have unimproved sidewalks and highlights those areas that are included in the Priority Investment Network described below.

The PMP designates a Priority Investment Network to prioritize the City's pedestrian improvement investments, with a focus on connections to schools and frequent transit stops. The prioritization identifies areas most in need based on areas with high potential pedestrian demand, equity, and corridor function. Exhibit 4.4-7 shows the Priority Investment Network throughout the study area. The portions of the Priority Investment Network located outside the study area also benefit people walking to and from areas in single-family zones (the study area) by connecting those neighborhoods to local business districts, schools, transit stops, and bicycle facilities.

Exhibit 4.4-6 Unimproved Sidewalks in the Study Area

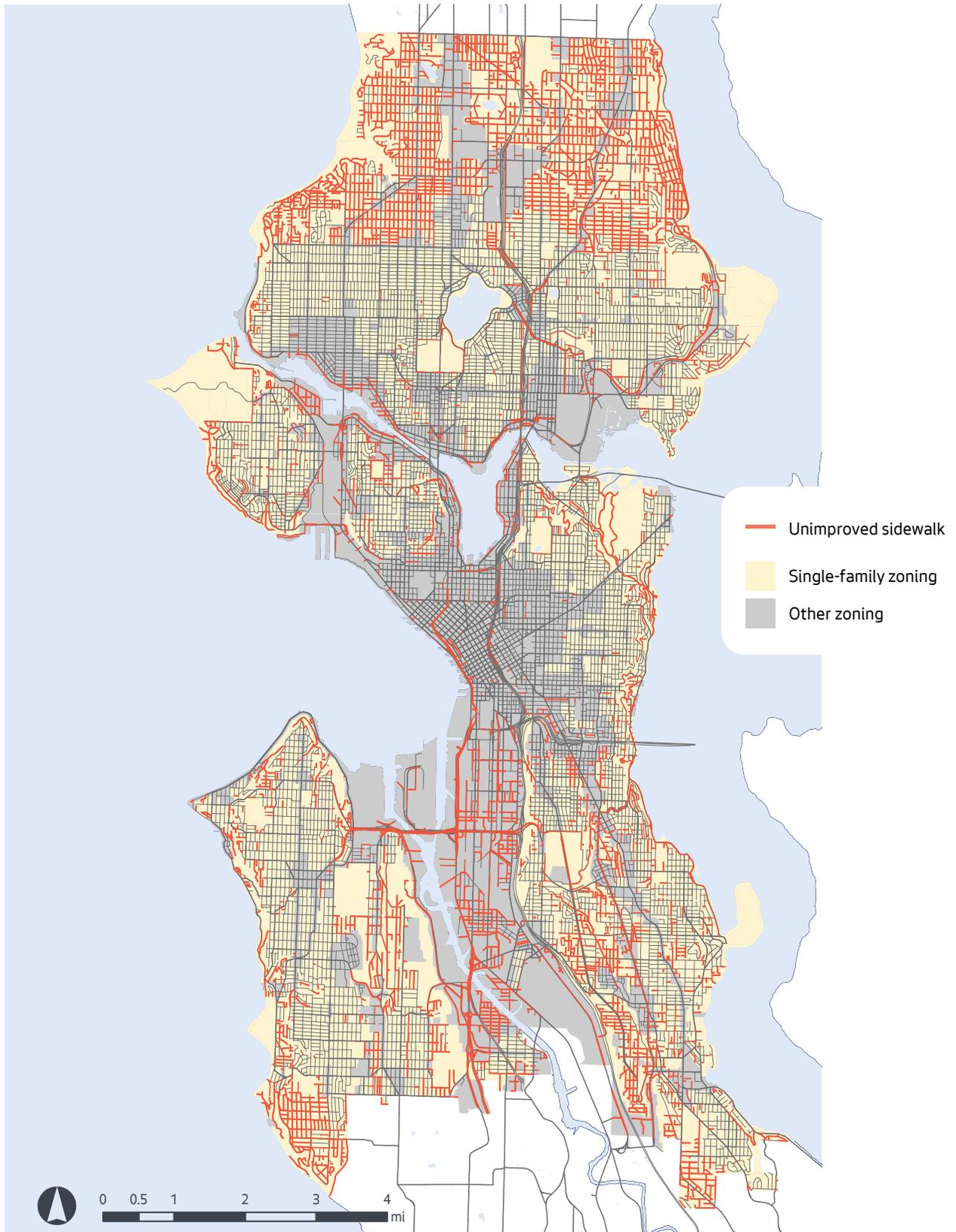
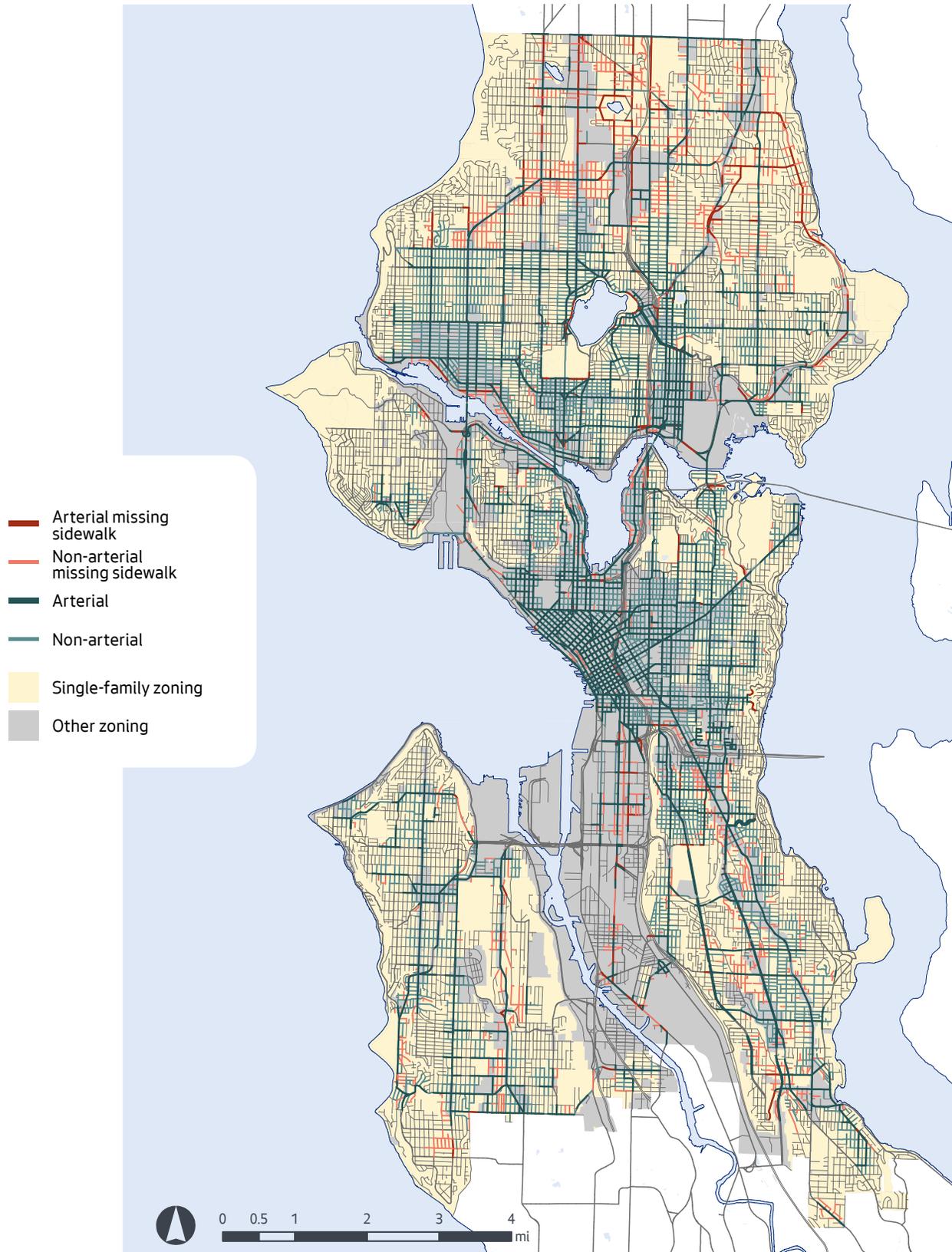


Exhibit 4.4-7 PMP Priority Investment Areas in the Study Area



## Bicycle Network

The City has more than 300 miles of bicycle facilities, including off-street facilities, protected bike lanes, neighborhood greenways, and shared street bicycle facilities ("sharrows"), and signed routes. Bicycle facilities exist throughout the city, of which approximately 100 miles are located within the study area (see Exhibit 4.4-8). The Seattle Bicycle Master Plan (BMP) identifies projects and programs to be implemented from 2014 to 2033 to achieve the vision that riding is a bicycle a comfortable and integral part of daily life in Seattle for people of all ages and abilities (SDOT 2017b). Exhibit 4.4-9 identifies planned bicycle facilities, with approximately 100 miles of protected bicycle lanes and nearly 250 miles of neighborhood greenways planned for throughout the city.

Exhibit 4.4-8 Existing Bicycle Network

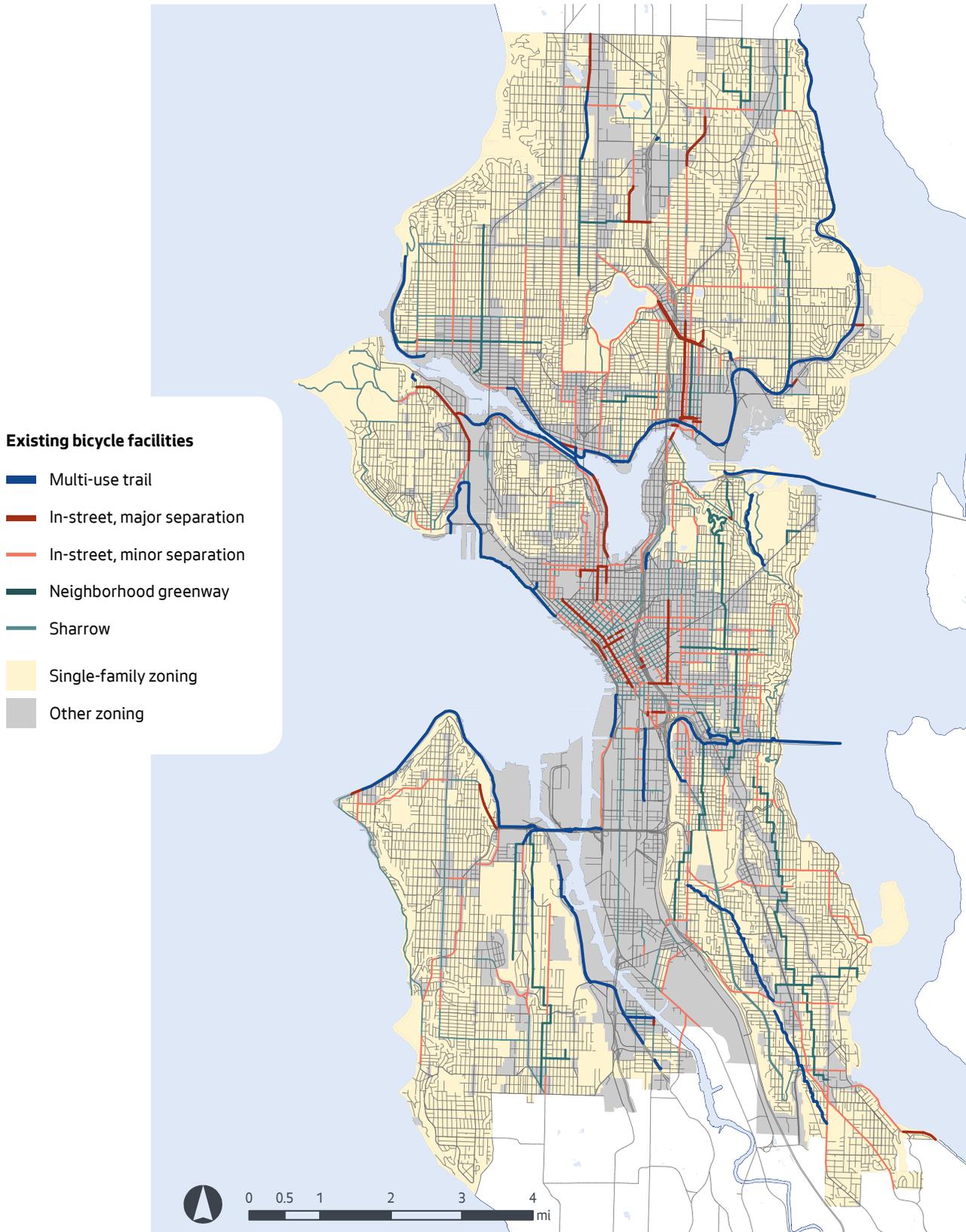
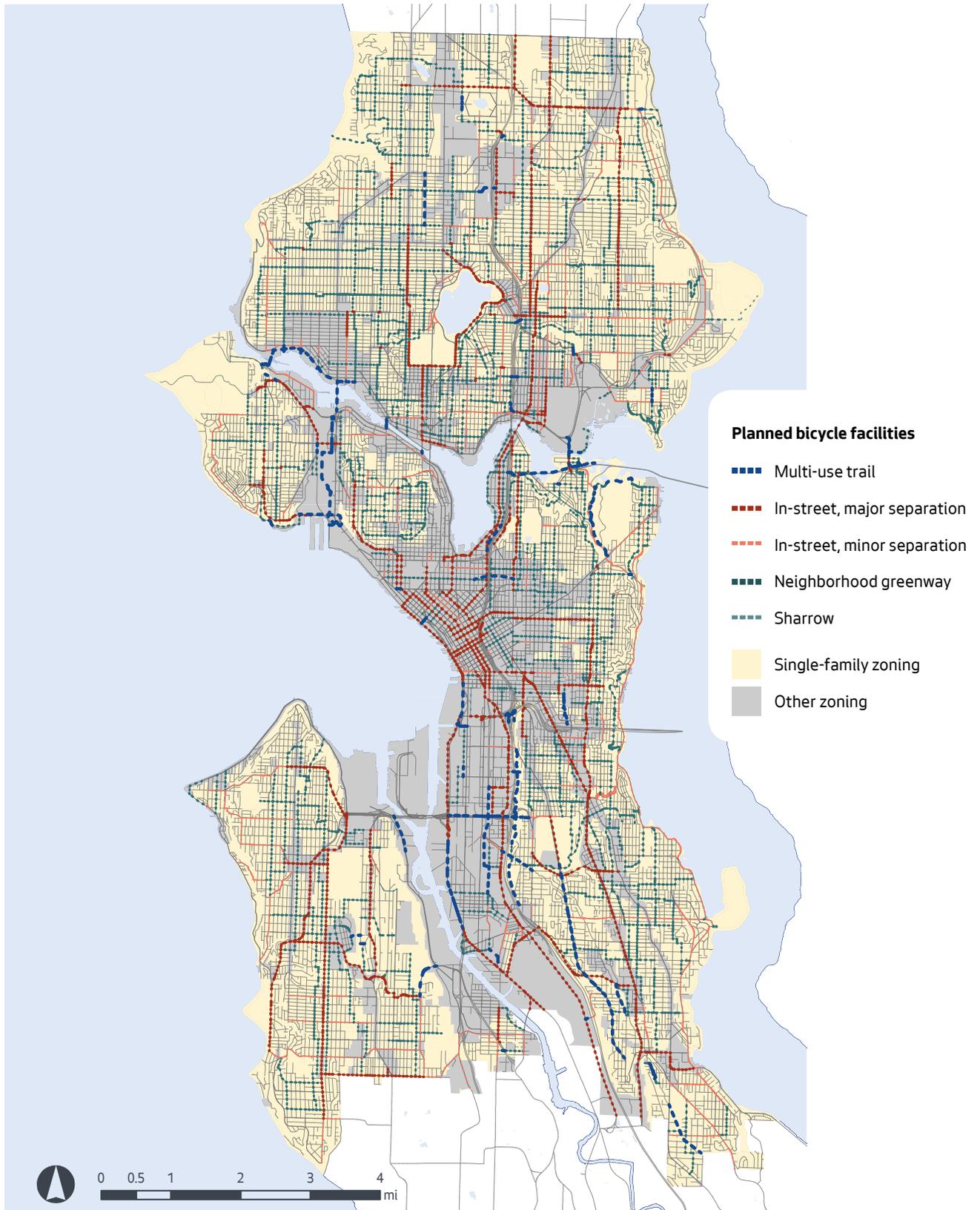


Exhibit 4.4-9 Planned Bicycle Network



## Transit Services

Seattle receives public transit services from King County Metro, Sound Transit, Community Transit, and the City of Seattle. Exhibit 4.4-10 shows the existing transit network. The Transit Master Plan (TMP) is a 20-year plan that outlines the investments needed to meet Seattle's transit demand through 2030 (SDOT 2016a). The City has designated 10 High Capacity Transit (HCT) Corridors and eight Priority Bus Corridors, along with Link light rail and the streetcar system. These corridors are prioritized for capital investments to ensure mobility within Seattle, one of the objectives outlined in the TMP.

SDOT identifies transit service that meets certain levels of frequency:

- 10-minute or "very frequent" service: at least one route serves this stop with an average of six trips per hour in each direction between 6:00 a.m. and 7:00 p.m. and no individual hour with fewer than four trips
- 15-minute or "frequent" service: at least one route serves this stop with an average of four trips per hour in each direction between 6:00 a.m. and 7:00 p.m. and no individual hour with fewer than three trips<sup>1</sup>
- Other stops throughout the city provide some level of transit service, ranging from frequency slightly less than described above to only a few trips per day

SDOT considers light rail stations to provide 10-minute service and streetcar stations to provide 15-minute service.

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<sup>1</sup> If a stop meets the 10-minute definition, it also meets the 15-minute definition.

Exhibit 4.4-10 Existing Transit Network

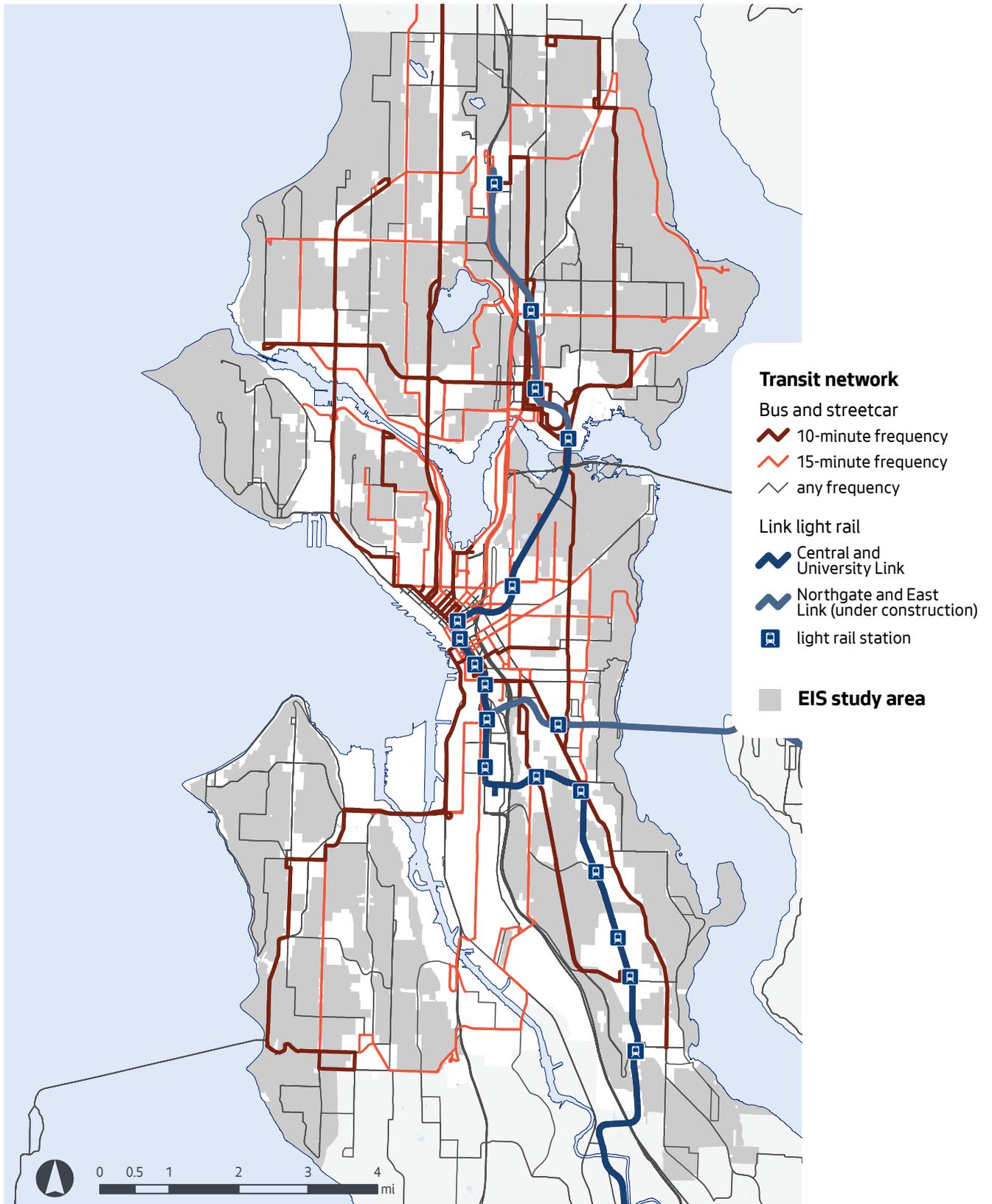
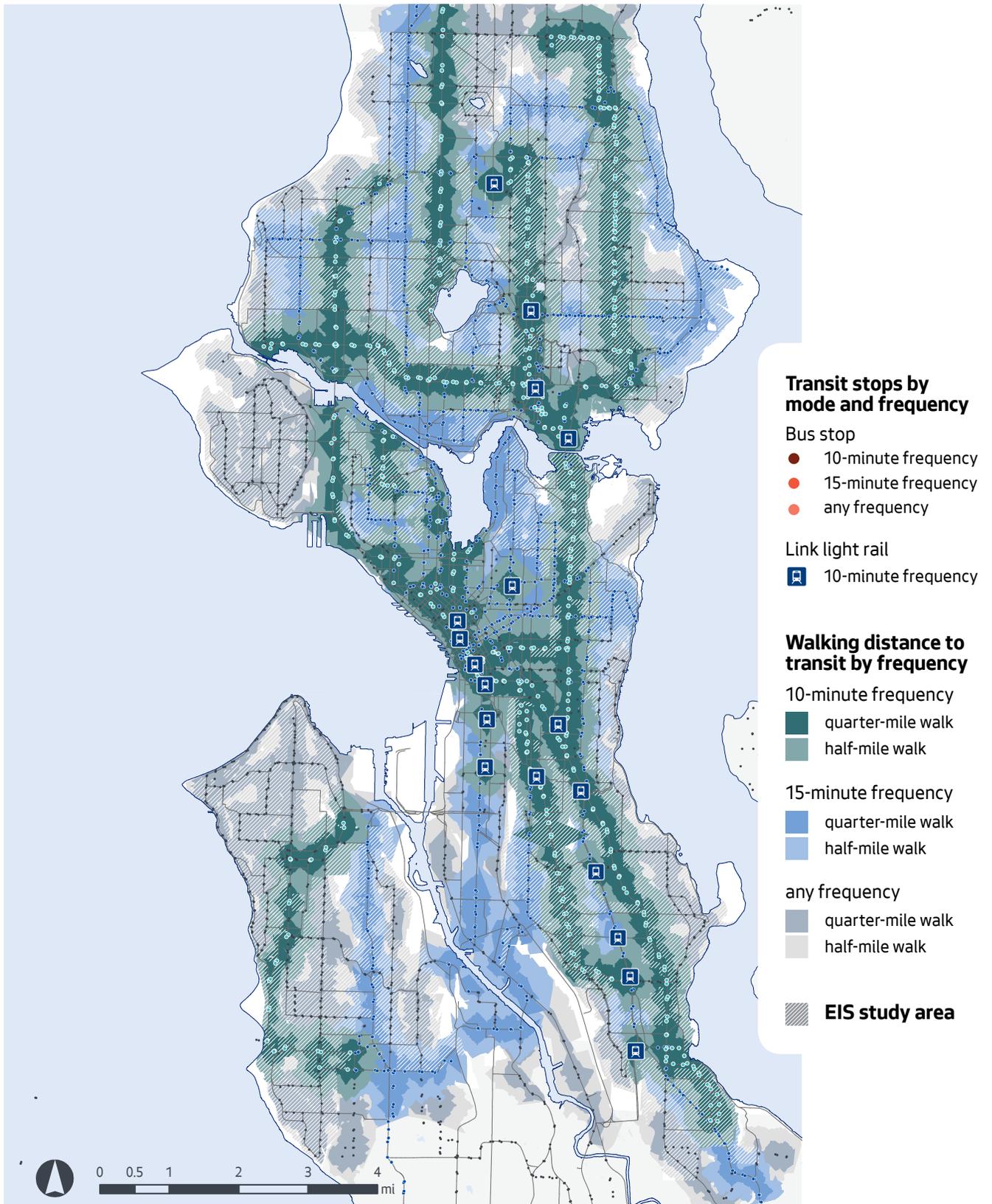


Exhibit 4.4-11 lists the percentage of study area parcels in single-family residential use within quarter- and half-mile walking distances of transit stops according to their frequency. Almost half of the households in the study area are within a half-mile walk of very frequent service, where transit comes on average every 10 minutes throughout the day. Likewise, almost half of households are even closer (within a quarter-mile walk) of transit service with 15-minute frequency. Overall, nearly the entire study area is within a short walk of a bus stop, though frequency at some stops could range from a few buses an hour to a just a few buses total in a day. Exhibit 4.4-12 shows areas within quarter- and half-mile walking distances of transit according to frequency.

**Exhibit 4.4-11** Study Area Parcels by Proximity to Transit

	Number of parcels	% of study area parcels
<b>In study area and in single-family residential use</b>	138,531	100%
<b>Very frequent transit service</b>		
Within a quarter-mile walk of transit with 10-minute service	30,496	22%
Within a half-mile walk of transit with 10-minute service	68,608	50%
<b>Frequent transit service</b>		
Within a quarter-mile walk of transit with 15-minute service	65,947	48%
Within a half-mile walk of transit with 15-minute service	100,880	73%
<b>Any transit service</b>		
Within a quarter-mile walk of any transit stop	116,126	84%
Within a half-mile walk of any transit stop	135,949	98%

Exhibit 4.4-12 Walking Distance to Transit



## Roadway Network

Seattle has about 1,540 lane-miles of arterial streets, 2,410 lane-miles of non-arterial streets, 122 bridges, and 1,070 signalized intersections. Much of Seattle's transportation network is constrained by the waterways in and around the city. The Ship Canal divides north Seattle from the rest of the city and has only six crossing points: the Ballard Bridge, the Fremont Bridge, State Route (SR) 99, Interstate 5 (I-5), the University Bridge, and the Montlake Bridge. Likewise, West Seattle is separated by the Duwamish Waterway and accessible via the West Seattle Bridge, Spokane Street Bridge, the 1st Ave S Bridge, and the South Park Bridge.

I-5 runs north-south throughout the city, serving both local and regional travelers. SR 99 also runs north-south through the city and tends to serve more locally focused trips. To the east, there are two bridges across Lake Washington: SR 520 and Interstate 90 (I-90). Other key state routes within the city include SR 522 connecting to the northeast and SR 509 connecting south to Sea-Tac Airport. City arterials generally follow a grid pattern. The City has designated a major truck street network throughout Seattle that carries a substantial amount of freight traffic. The state routes, interstates, and major arterials linking freight destinations are part of this network.

## 4.4.2 Impacts

### Parking Analysis Methodology

We evaluated the potential parking impacts associated with the proposed Land Use Code changes by comparing the existing availability of on-street parking with the expected increase in demand for on-street parking under each alternative. To evaluate the change in demand, we first estimated the vehicle ownership rates for residents in ADUs. Next, we used the results of the housing analysis in Section 4.1, Housing and Socioeconomics, to determine the expected number of new ADUs in the study locations. We then applied the vehicle ownership rates, assumed each vehicle would park on the street, and evaluated the resulting change in parking availability. Our analysis focused on the expected outcomes in each study location and then evaluated the results in the context of the entire EIS study area.

## Vehicle Ownership for ADU Residents

Data about the demographics and travel characteristics for current ADU residents in Seattle was not available; therefore, to estimate the characteristics of Seattle's ADU residents, we reviewed:

- A 2013 survey that Portland State University (PSU) conducted of ADU owners in three Oregon communities (Portland, Eugene, and Ashland) that provided details about the characteristics of their ADU residents (Horn et al 2013). For this analysis, we utilized only the results from Portland, because Portland's land use and transportation characteristics resemble Seattle's more closely than those of Eugene or Ashland.<sup>2</sup>
- The 2012-2016 American Community Survey (ACS) for Portland and Seattle.

These reports provided details about vehicle ownership levels and household characteristics. The complete methodology for estimating vehicle ownership levels for ADU residents is outlined in detail in Appendix B. Based on this analysis, we determined that each additional ADU would generate between 1.0 and 1.3 additional vehicles using on-street parking under all alternatives. For purposes of analysis, we assumed that all ADU residents would park on the street even though Alternatives 1 and 3 would require off-street parking for new ADUs.

## Number of Anticipated ADUs in the Study Locations

Based on the parcel typology described in Section 4.1, Housing and Socioeconomics, we classified parcels in each study location according to their ADU eligibility status. This classification reflects Land Use Code regulations for development in single-family zones, requirements for vehicle access, and lot size and configuration. We considered any parcel of type A, B, C, or D to be "eligible" to have an ADU and any parcel of type Z to be "ineligible." To estimate parking demand for each alternative, we drew on the 2018-2027 ADU production estimates generated using the pro forma analysis and behavioral models described in Appendix A. Those estimates indicated that between ~~1.5~~ 1.63 and ~~3.0~~ 4.64 percent of parcels in each study location could have an ADU, depending on the characteristics of each parcel type. In our parking analysis, we applied

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<sup>2</sup> [A more recent survey of ADU owners and residents in Portland, Oregon, confirms that an assumption that ADU residents generally own one vehicle is reasonable. When ADU residents who are renters were asked about vehicle ownership, 70 percent of respondents \(100 of 142\) had one vehicle, while the remaining 30 percent were split evenly between no vehicle ownership and ownership of two or more vehicles \(Gebhardt 2018\).](#)

the higher end of ~~this the~~ range of ADU production rates (~~3.0 percent~~) for all eligible parcels. Because several development standards would vary across alternatives, including the number of ADUs allowed on a lot, we made the following assumptions about the number of lots that would have ADUs under each alternative:

- **Alternative 1 (No Action):** 3 percent of eligible parcels would have 1 ADU.
- **Alternative 2:** ~~3.5~~ 5 percent of eligible parcels would have 2 ADUs.
- **Alternative 3:** ~~1.5~~ 2 percent of all eligible parcels would develop 1 ADU and ~~1.5~~ 2 percent would develop 2 ADUs.
- **Preferred Alternative:** 5 percent of eligible parcels would have 2 ADUs.

These rates let us estimate how many new ADUs would be created in our study locations under each alternative. Exhibit 4.4-13 shows the estimated number of parcels in each study location eligible for an ADU based on the parcel typology. The northeast study location would have the most eligible parcels (1,141) and the southeast study location the fewest (127). Exhibit 4.4-13 also shows the number of ADUs anticipated under each alternative.

**Exhibit 4.4-13** ADU-Eligible Parcels in Each Study Location

Study location	Number of ADU-eligible parcels	Anticipated number of ADUs produced			
		Alternative 1 (No Action)	Alternative 2	Alternative 3	Preferred Alternative
Northeast	1,141	34	<del>68</del> 114	<del>51</del> 69	114
Northwest	952	29	<del>58</del> 96	<del>42</del> 57	96
Southeast	127	4	<del>8</del> 12	<del>6</del> 9	12
Southwest	787	24	<del>48</del> 78	<del>36</del> 48	78
<b>Total</b>	<b>3,007</b>	<b>91</b>	<b><del>182</del> 300</b>	<b><del>135</del> 183</b>	<b>300</b>

## Parking Analysis Results

We calculated the expected change in parking availability in each study location using the number of ADUs anticipated under each alternative and the anticipated rate of vehicle ownership per ADU. We then compared this increase in parking availability to the existing parking supply in each study location, as shown in Exhibit 4.4-14.

**Exhibit 4.4-14** Results by Study Location

	ADUs produced	Vehicles added	Existing conditions		After ADU production	
			Spaces available	Parking utilization	Spaces available	Parking utilization
<b>Northeast Study Location</b>						
<b>Alternative 1</b>	34	39	1,140	53%	1,101	53%
<b>Alternative 2</b>	<del>68</del> <u>114</u>	<del>78</del> <u>131</u>	1,140	53%	<del>1,062</del> <u>1,009</u>	<del>56%</del> <u>58%</u>
<b>Alternative 3</b>	<del>51</del> <u>69</u>	<del>59</del> <u>79</u>	1,140	53%	1,081	<del>55%</del> <u>56%</u>
<b>Preferred Alternative</b>	<u>114</u>	<u>131</u>	<u>1,140</u>	<u>53%</u>	<u>1,009</u>	<u>58%</u>
<b>Northwest Study Location</b>						
<b>Alternative 1</b>	29	35	793	63%	758	64%
<b>Alternative 2</b>	<del>58</del> <u>96</u>	<del>70</del> <u>116</u>	793	63%	<del>723</del> <u>677</u>	<del>66%</del> <u>68%</u>
<b>Alternative 3</b>	<del>42</del> <u>57</u>	<del>51</del> <u>69</u>	793	63%	<del>742</del> <u>724</u>	<del>65%</del> <u>66%</u>
<b>Preferred Alternative</b>	<u>96</u>	<u>116</u>	<u>793</u>	<u>63%</u>	<u>677</u>	<u>68%</u>
<b>Southeast Study Location</b>						
<b>Alternative 1</b>	4	5	72	78%	67	80%
<b>Alternative 2</b>	<del>8</del> <u>12</u>	<del>10</del> <u>15</u>	72	78%	<del>62</del> <u>57</u>	<del>81%</del> <u>83%</u>
<b>Alternative 3</b>	<del>6</del> <u>9</u>	<del>8</del> <u>12</u>	72	78%	<del>64</del> <u>60</u>	<del>80%</del> <u>82%</u>
<b>Preferred Alternative</b>	<u>12</u>	<u>15</u>	<u>72</u>	<u>78%</u>	<u>57</u>	<u>83%</u>
<b>Southwest Study Location</b>						
<b>Alternative 1</b>	24	24	1,311	51%	1,287	52%
<b>Alternative 2</b>	<del>48</del> <u>78</u>	<del>49</del> <u>80</u>	1,311	51%	<del>1,262</del> <u>1,231</u>	<del>53%</del> <u>54%</u>
<b>Alternative 3</b>	<del>36</del> <u>48</u>	<del>37</del> <u>49</u>	1,311	51%	<del>1,274</del> <u>1,262</u>	<del>52%</del> <u>53%</u>
<b>Preferred Alternative</b>	<u>78</u>	<u>80</u>	<u>1,311</u>	<u>51%</u>	<u>1,231</u>	<u>54%</u>

## Transportation Analysis Methodology

Our methodology for evaluating potential impacts to transportation considered how overall population changes anticipated under each alternative would affect the service levels of the existing transportation networks. Generally, we anticipate an impact if a transportation network would not be able to accommodate an increase in demand or if development were to displace established transportation routes. We determined impacts by comparing expected population changes and impacts relative to those considered in the Comprehensive Plan EIS. The Comprehensive Plan EIS thoroughly analyzed the potential impacts to the road, bicycle, pedestrian, and transit networks from a projected growth of 70,000 households in the city through 2035, including approximately 8,400 households in areas outside designated urban villages. Any population change associated with ADU production under all three alternatives in this EIS would fall within the growth considered in the Comprehensive Plan EIS. In other words, the proposed Land Use Code changes are not anticipated to induce new growth in the city, but rather increased ADU production would help meet existing and future demand for housing. The proposed Land Use Code changes would not result in development outside single-family zones; therefore, no displacement of established transportation routes would occur, and we do not discuss it further in this analysis.

## Impacts of Alternative 1 (No Action)

### Parking

Assuming three percent of eligible parcels would have one ADU constructed under Alternative 1 (No Action), 91 ADUs would be created and 104 new vehicles added across all four study locations. In the southeast study location, we estimated that four new ADUs would generate five new vehicles that would occupy six percent of the available parking spaces. This would reduce the parking supply from 72 to 67 available spaces. Due to their size, we expect the northeast, northwest, and southwest study locations to have more total parcels with ADUs, but new vehicles from ADU residents would occupy a smaller percentage of available parking spaces than in the southeast study location (four percent for the northeast and northwest locations; two percent for the southwest). Under Alternative 1 (No Action), increased parking demand resulting from ADU production in the four study locations would not exceed or approach existing on-street parking availability.

For purposes of analysis, we assumed that on-street parking utilization would not become an issue until parking utilization exceeded 85 percent. None of the four study locations would exceed the 85-percent threshold under Alternative 1 (No Action). As described above, the four study locations provide a representative sample with which to compare the potential impacts to the larger study area for this EIS. Since none of the study locations exceed the 85 percent threshold, we conclude that ADU production would not have an adverse impact on the availability of on-street parking throughout the study area.

Although none of the four study locations exceed the 85 percent threshold, there are likely some specific blocks within the study area where on-street parking utilization currently exceeds parking supply and would be more sensitive to changes in local population. The degree of the deficiency and impacts experienced in any given neighborhood depends on many factors including the choices an individual makes about parking on- or off- the street when there are existing off-street parking spaces provided (i.e., in a driveway or a garage that are required or provided by choice). The city will continue to respond to changes to parking supply in specific areas that currently have or are projected to have high parking utilization.

## Transportation

As described previously, the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS. Therefore, the impacts to the transportation system would not differ from those described in the Comprehensive Plan EIS, which found that there would not be significant impacts to the transportation network. Further, the City has identified plans to improve the transit, pedestrian, and bicycle network through its Move Seattle, Pedestrian Master Plan, Bicycle Master Plan, Transit Master Plan, and other planning efforts. These plans are being implemented and are expected to continue to be implemented under all alternatives.

## Impacts of Alternative 2

### Parking

In Alternative 2, we assumed that ~~three~~ five percent of eligible parcels would have two ADUs, yielding ~~182~~ 300 ADUs and ~~207~~ 342 new vehicles across all study locations. Like Alternative 1 (No Action), we estimate that the share of available parking used to satisfy the increase in parking

demand that new ADU residents would generate would be highest in the southeast study location (44 21 percent). The overall utilization of available parking spaces under Alternative 2 would range from ~~four six~~ to 44 21 percent across all four study locations. Under Alternative 2, increased parking demand resulting from ADU production in the four study locations would not exceed existing on-street parking availability.

For purposes of analysis, we assumed that on-street parking utilization would not become an issue until parking utilization exceeded 85 percent. None of the four study locations would exceed the 85-percent threshold under Alternative 2. As described above, the four study locations provide a representative sample with which to compare the potential impacts to the larger study area for this EIS. Since none of the study locations exceeds the 85 percent threshold, we conclude that ADU production would not have an adverse impact on the availability of on-street parking throughout the study area.

Although none of the four study locations exceed the 85 percent threshold, there are likely some specific blocks within the study area where on-street parking utilization currently exceeds parking supply and would be more sensitive to changes in local population. The degree of the deficiency and impacts experienced in any given neighborhood depends on many factors including the choices an individual makes about parking on or off the street when there are existing off-street parking spaces provided (i.e., in a driveway or a garage that are required or provided by choice). The City will continue to respond to changes to parking supply in specific areas that currently have or are projected to have high parking utilization.

## **Transportation**

As described previously, the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS. Therefore, the impacts to the transportation system would not differ from those described in the Comprehensive Plan EIS, which found that there would not be significant impacts to the transportation network. Further, the City has identified plans to improve the transit, pedestrian, and bicycle network through its Move Seattle, Pedestrian Master Plan, Bicycle Master Plan, Transit Master Plan, and other planning efforts. These plans are being implemented and are expected to continue to be implemented under all alternatives.

## Impacts of Alternative 3

### Parking

In Alternative 3, we assumed that ~~1.5~~ two percent of eligible parcels would have at least one ADU and ~~1.5~~ two percent of eligible parcels would develop two ADUs. This would yield a total of ~~135~~ 183 ADUs and ~~155~~ 209 new vehicles across all study locations. The results under Alternative 3 were ~~nearly identical~~ similar to Alternative 1 (No Action). The share of available parking spaces used to satisfy new parking demand from ADU residents would range from ~~three~~ four percent in the southwest study location to ~~11~~ 17 percent in the southeast study location. Under Alternative 3, the increased parking demand resulting from ADU production in the four study locations would not exceed the existing on-street parking availability.

For purposes of analysis, we assumed that on-street parking utilization would not become an issue until parking utilization exceeded 85 percent. None of the four study locations would exceed the 85-percent threshold under Alternative 3. As described above, the four study locations provide a representative sample with which to evaluate the potential impacts to the larger study area for this EIS. Since none of the study locations exceeds the 85 percent threshold, we conclude that ADU production would not have an adverse impact on the availability of on-street parking throughout the study area.

Although none of the four study locations ~~do not~~ exceeds the 85 percent threshold, there are likely some specific blocks within the study area where on-street parking utilization currently exceeds parking supply and would be more sensitive to changes in local population. The degree of the deficiency and impacts experienced in any given neighborhood depends on many factors including the choices an individual makes about parking on or off the street when there are existing off-street parking spaces provided (i.e., in a driveway or a garage that are required or provided by choice). The City will continue to respond to changes to parking supply in specific areas that currently have or are projected to have high parking utilization.

### Transportation

As described previously, the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS. Therefore, the impacts to the transportation

system would not differ from those described in the Comprehensive Plan EIS, which found that there would not be significant impacts to the transportation network. Further, the City has identified plans to improve the transit, pedestrian, and bicycle network through its Move Seattle, Pedestrian Master Plan, Bicycle Master Plan, Transit Master Plan, and other planning efforts. These plans are being implemented and are expected to continue to be implemented under all alternatives.

## **IMPACTS OF THE PREFERRED ALTERNATIVE**

### **Parking**

Like Alternative 2, in the Preferred Alternative we assumed that five percent of eligible parcels would have two ADUs, yielding 300 ADUs and 342 new vehicles across all study locations. Like Alternative 1 (No Action), we find that the share of available parking used to satisfy the increase in parking demand new ADU residents generate would be highest in the southeast study location (21 percent). The overall utilization of available parking spaces under the Preferred Alternative would range from six to 21 percent across all four study locations. Under the Preferred Alternative, increased parking demand resulting from ADU production in the four study locations would not exceed existing on-street parking availability.

For purposes of analysis, we assumed that on-street parking utilization would not become an issue until parking utilization exceeded 85 percent. None of the four study locations would exceed the 85-percent threshold under the Preferred Alternative. As described above, the four study locations provide a representative sample with which to compare the potential impacts to the larger study area for this EIS. Since no study locations exceeds the 85 percent threshold, we conclude that ADU production would not have an adverse impact on the availability of on-street parking throughout the study area.

Although none of the four study locations exceeds the 85 percent threshold, there are likely some specific blocks within the study area where on-street parking utilization currently exceeds parking supply and would be more sensitive to changes in local population. The degree of the deficiency and impacts experienced in any given neighborhood depends on many factors, including an individual's choice to park on or off the street when off-street parking spaces exist (i.e., in a driveway or a garage that are required or provided voluntarily). The City will continue to respond to changes to parking supply in specific areas that currently have or are projected to have high parking utilization.

## Transportation

As described previously, the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS. Therefore, the impacts to the transportation system would not differ from those described in the Comprehensive Plan EIS, which found that there would not be significant impacts to the transportation network. Further, the City has identified plans to improve the transit, pedestrian, and bicycle networks through its Move Seattle, Pedestrian Master Plan, Bicycle Master Plan, Transit Master Plan, and other planning efforts. These plans are being implemented and are expected to continue to be implemented under all alternatives.

### **4.4.3 Mitigation Measures**

The analysis in this section identifies minor adverse impacts that may occur on specific blocks within the study area where on-street parking demand exceeds supply, but it does not identify these as potential significant adverse impacts, meaning no mitigation measures are required. However, the City will continue to monitor for any changes to parking supply in specific areas that are currently or projected to exceed available supply. If issues are identified, the City will rely upon use of regulations in its municipal code, including Vehicles and Traffic (Title 11) and Land Use Code (Title 23), and continued implementation of RPZs in areas that meet the eligibility requirements. Further, the City will continue to implement plans to improve the transit, pedestrian, and bicycle network.

### **4.4.4 Significant Unavoidable Adverse Impacts**

No significant unavoidable adverse impacts are anticipated from any of the alternatives considered in this EIS.

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## 4.5 Public Services and Utilities

This section analyzes the potential impacts to public services and utilities from the Land Use Code changes under each alternative of the proposed action. The analysis of the potential impacts to public services and utilities in the EIS for the Seattle 2035 Comprehensive Plan (Seattle 2015 and Seattle 2016) is incorporated by reference into this EIS. The Comprehensive Plan EIS and this EIS both consider the same question: How does projected growth in the city affect the ability of public services and utilities to provide adequate service? The Comprehensive Plan EIS thoroughly analyzed the potential impacts to public services and utilities from a projected growth of 70,000 households in the city through 2035, including approximately 8,400 households in areas outside designated urban villages. Since the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS, we considered the estimated increase in households from the proposed Land Use Code changes and evaluated the impacts in the context of the changes analyzed in the Comprehensive Plan EIS.

### 4.5.1 Affected Environment

The Comprehensive Plan EIS describes the existing service providers and service levels for police, fire and emergency medical, public schools, water, sewer, stormwater, and electricity in Seattle. Because the proposed Land Use Code changes evaluated in this EIS would affect an area included in the study area for the Comprehensive Plan EIS, we incorporate that information by reference in this EIS and summarize the pertinent details below. For details, see Section 3.8 - Public Services and Section 3.9 - Utilities of the Comprehensive Plan EIS.

## **FIRE AND EMERGENCY MEDICAL SERVICES**

Demand for fire and emergency medical services (EMS) is generally estimated to increase proportionally with population growth. The City has an existing network of neighborhood fire stations that serve the current population. The Seattle Fire Department (SFD) has plans in place to accommodate the anticipated growth of 70,000 households outlined in the Comprehensive Plan EIS. See Section 3.8 - Public Services of the Comprehensive Plan EIS for additional details. Exhibit 4.5-1 shows the locations of SFD fire stations throughout Seattle.

## **POLICE SERVICES**

Demand for police service is not based solely on changes in population. Geographic characteristics of the city and the types of service calls received affect the demand for police services, including patrols on foot, on bikes, and in cars. The Seattle Police Department (SPD) has plans in place to accommodate the anticipated growth of 70,000 households outlined in the Comprehensive Plan EIS. See Section 3.8 - Public Services of the Comprehensive Plan EIS for additional details. Exhibit 4.5-2 shows how SPD provides police services to precincts, sectors, and beats

Exhibit 4.5-1 Seattle Fire Department Stations

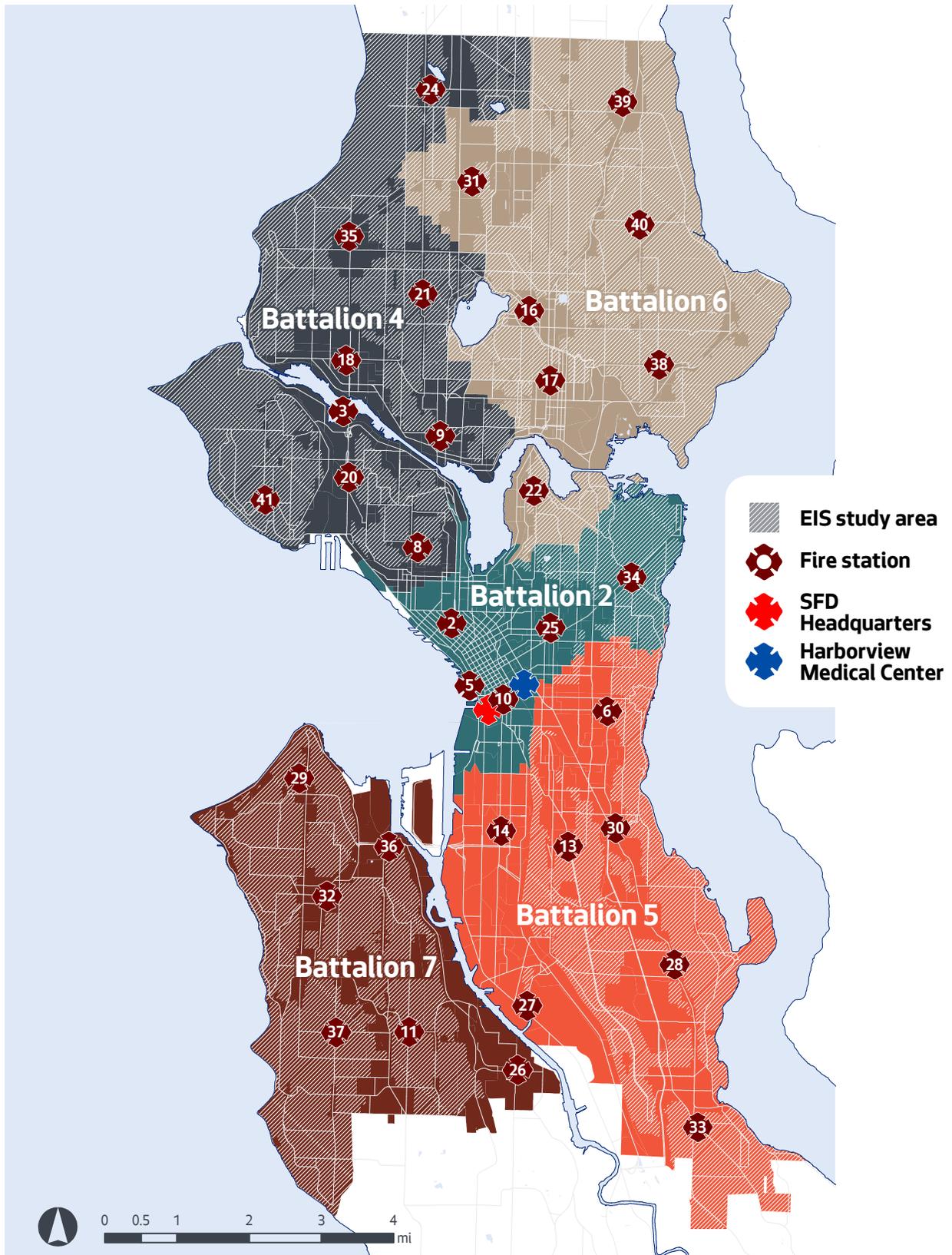
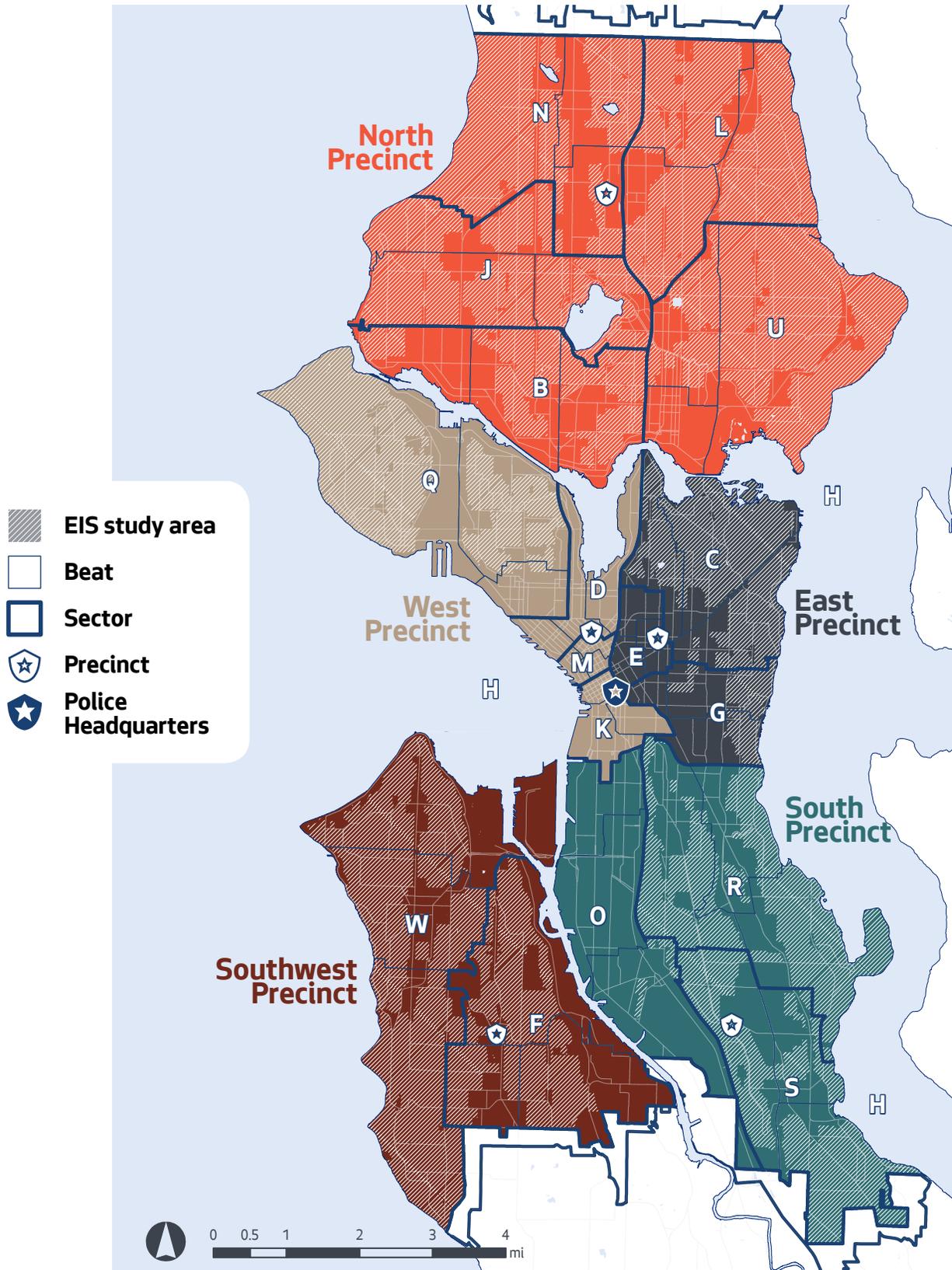


Exhibit 4.5-2 Seattle Police Department Precincts



## PUBLIC SCHOOLS

Total student enrollment in Seattle Public Schools (SPS) has steadily increased since 2007 and that trend is expected to continue in the near future. As outlined in the Comprehensive Plan EIS, SPS is continually planning for changes in student enrollment and is actively planning for future growth through their Facilities Master Plan. To plan for future enrollment, SPS uses the cohort survival model, which calculates a "survival rate" for each grade based on the proportion of students who historically continue from one grade to the next. To project kindergarten enrollment, SPS estimates a birth-to-kindergarten ratio based on the proportion of children born in Seattle who historically enroll in Seattle Public Schools five years later. SPS then applies that ratio to the annual number of live births five years prior to a given school year to generate an overall 10-year enrollment projection. SPS updates these projections annually to reflect the latest data on known live births.

## SEATTLE PUBLIC UTILITIES — WATER

To plan for Seattle's water supply needs, Seattle Public Utilities (SPU) estimates demand on the current system based on population projections. Despite recent population growth, total water system usage in Seattle is declining. This is partially due to conservation efforts, like encouraging low-flow fixtures for both residential and commercial uses. Generally, SPU maintains, improves, and repairs the water system as needed. SPU uses growth forecasts from the Puget Sound Regional Council (PSRC) and the Washington State Office of Financial Management (OFM) to develop long-range (i.e., at least 20 years) water demand forecasts and to determine if new supplies or additional system capacity are necessary. SPU updates these water demand forecasts, supply analyses, and capacity analyses with each new water system plan or, more frequently, if substantial changes in supply or demand warrant consideration. See Section 3.9 - Utilities of the Comprehensive Plan EIS for additional details.

## SEATTLE PUBLIC UTILITIES — SEWER AND STORMWATER

Sanitary sewer demand estimates are based on population density and correlate with water system usage. Over time, redevelopment can reduce per-capita sewer demand, as newer, low- or no-flow plumbing fixtures and equipment replace older, less efficient installations. As described above for the water system, these conservation practices have reduced the overall demand on the wastewater system.

Stormwater runoff calculations are based on rainfall intensity and land use surface types. SPU plans stormwater drainage needs based on zoning standards, including the maximum lot coverage limit for development in single-family zones.

## **KING COUNTY WASTEWATER TREATMENT DIVISION AND SEATTLE PUBLIC UTILITIES — COMBINED SEWER SYSTEM**

King County Wastewater Treatment Division (KC) and SPU own and operate combined sewer systems that serve about one-third of the city. Each combined sewer system is a piped network carrying both sanitary wastewater and stormwater runoff to a King County wastewater treatment plant (WWTP). Some portions of the drainage system have been identified as capacity constrained. In these areas development is required to limit the peak discharges of stormwater. Any area that discharges to an informal ditch and culvert system is considered capacity constrained.

## **SEATTLE CITY LIGHT — ELECTRIC POWER**

To estimate demand for electricity, Seattle City Light (SCL) considers growth projections and land use patterns (e.g., residential vs. manufacturing). Despite recent population and economic growth, SCL's load is relatively stable because its service territory is well established and SCL has administered an aggressive energy conservation program for nearly 40 years.

## **4.5.2 Impacts**

### **METHODOLOGY**

Our methodology for evaluating potential impacts to public services and utilities considered the overall changes in population anticipated under each alternative relative to the existing service levels for each public service and utility. For stormwater impacts, the analysis considers the potential change in lot coverage as increased lot coverage is correlated with increased stormwater runoff. Generally, we anticipate an impact if a public service or utility would not be able to accommodate an increase in demand. Specifically, in this analysis we considered the number of ADUs created under each alternative, the resulting change in population, and whether that change would result in adverse impacts on public services

or utilities. We determined impacts by comparing expected population changes relative to those considered in the Comprehensive Plan EIS and the resulting impacts.

While other sections of this EIS have referred to estimates of households that would occupy new ADUs, in this analysis we focused on the populations living in ADUs as demand for public services and utilities tends to increase in proportion to the number of people living and working in an area.

## RESULTS

### New ADUs

As described in Section 4.1, Housing and Socioeconomics, we expect all three alternatives to result in more ADUs constructed in Seattle. Exhibit 4.5-3 shows the estimated number of new ADUs that could be created between 2018 and 2027 under each alternative.<sup>1</sup>

**Exhibit 4.5-3** ADUs Produced by Alternative and Type

	Alternative 1 (No Action)	Alternative 2	Alternative 3	Preferred Alternative
<b>Estimated number of parcels that build exactly one AADU</b>	900 <u>820</u>	630 <u>1,070</u>	650 <u>900</u>	<u>1,070</u>
<b>Estimated number of parcels that build exactly one DADU</b>	990 <u>1,150</u>	940 <u>2,030</u>	960 <u>1,540</u>	<u>2,120</u>
<b>Estimated number of parcels that build two ADUs</b>	—	880 <u>590</u>	745 <u>480</u>	<u>620</u>
<b>Total ADUs</b>	<b>1,890 <u>1,970</u></b>	<b>3,330 <u>4,280</u></b>	<b>3,090 <u>3,400</u></b>	<b><u>4,430</u></b>
<b>Additional ADUs compared to Alternative 1 (No Action)</b>	—	1,440 <u>2,310</u>	1,210 <u>1,430</u>	<u>2,460</u>

<sup>1</sup> See Section 1.8 for a description of how we modified the methodology for estimating ADU production under each alternative for the Final EIS.

## Population Change

In single-family zones, household size is defined as the sum of the people living in the main house and any ADUs on the lot. For example, a main house with two people and an ADU with two people yields a household size of four. In 2016, the average household size in Seattle was 2.12 people (U.S. Census Bureau 2016). American Community Survey data from 2016 reports an average size of 2.74 people for households in one-unit structures (detached or attached). Currently, the Land Use Code defines a household as any number of related people, or up to eight unrelated people, and establishes that only one household can live on a lot in a single-family zone.

The maximum household size limit varies across the alternatives. Under Alternatives 1 and 3, the maximum household size would remain at eight unrelated people, including occupants of any ADUs on the lot. Under Alternative 2 and the Preferred Alternative, the maximum household size would be eight unrelated people for lots with up to one ADU and 12 unrelated people for lots with an AADU and a DADU.

While the Land Use Code specifies the maximum number of people who can live on a lot, potential impacts on public services and utilities depend specifically on the additional people who would occupy new ADUs under each alternative. We anticipate the average number of people living in an ADU would be lower than the overall average household size in Seattle's single-family zones because ADUs tend to be smaller than single-family houses. As data was not available for the average number of people living in an ADU in Seattle, we used available data from Portland, Oregon, as a proxy (Horn et al 2013). The Portland data showed that an average of 1.36 people were living in each ADU. For purposes of this analysis, we rounded up that number to assume an average of 1.5 people per ADU.

We then analyzed the population change that would result from increased ADU production based on this assumption of average occupants per ADU. For all alternatives, we assumed an average household size for lots with one ADU of 3.5 people; in Alternatives 2 and 3 and the Preferred Alternative, on lots with two ADUs, we assumed an average household size of 5.0 people. In considering potential impacts, we excluded the population living in the main house because we expect that, across all alternatives, any increase in the number of people living on a lot would result from adding one or two ADUs, not from a change to the number of people living in the main house. Exhibit 4.5-4 summarizes our household size assumptions.

We also considered a scenario where every lot reaches the maximum household size. In this case, we assumed that half of a lot's residents would occupy the main house and the other half would occupy the ADUs. For Alternatives 1 and 2 and the Preferred Alternative, this would result in four people per ADU; for Alternative 3, we assumed four people per ADU on a lot with one ADU and two people per ADU on a lot with two ADUs. Exhibit 4.5-5 presents the changes in household size resulting from ADU production based on the average number of people anticipated in each ADU. Exhibit 4.5-6 presents the anticipated changes based on the maximum household size.

**Exhibit 4.5-4** Average and Maximum Household Size Assumptions

ADUs on the lot		Alternative 1 (No Action)			Alternative 2			Alternative 3			Preferred Alternative		
		House	ADUs	Total	House	ADUs	Total	House	ADUs	Total	House	ADUs	Total
Average household size assumptions	one AADU	2	1.5	3.5	2	1.5	3.5	2	1.5	3.5	<u>2</u>	<u>1.5</u>	<u>3.5</u>
	one DADU	2	1.5	3.5	2	1.5	3.5	2	1.5	3.5	<u>2</u>	<u>1.5</u>	<u>3.5</u>
	two ADUs	—	—	—	2	3	5	2	3	5	<u>2</u>	<u>3</u>	<u>5</u>
Maximum household size assumptions	one AADU	4	4	8	4	4	8	4	4	8	<u>4</u>	<u>4</u>	<u>8</u>
	one DADU	4	4	8	4	4	8	4	4	8	<u>4</u>	<u>4</u>	<u>8</u>
	two ADUs	—	—	—	4	8	12	4	4	8	<u>4</u>	<u>8</u>	<u>12</u>

**Exhibit 4.5-5** Anticipated Population Based on Average Household Size

	Alternative 1 (No Action)	Alternative 2	Alternative 3	Preferred Alternative
ADU population on lots with one AADU	<del>1,350</del> <u>1,230</u>	<del>945</del> <u>1,605</u>	<del>975</del> <u>1,350</u>	<u>1,605</u>
ADU population on lots with one DADU	<del>1,485</del> <u>1,725</u>	<del>1,410</del> <u>3,045</u>	<del>1,440</del> <u>2,310</u>	<u>3,180</u>
ADU population on lots with two ADUs	—	<del>2,640</del> <u>1,770</u>	<del>2,235</del> <u>1,440</u>	<u>1,860</u>
Total ADU population	<del>2,835</del> <u>2,955</u>	<del>4,995</del> <u>6,420</u>	<del>4,650</del> <u>5,100</u>	<u>6,645</u>
Additional population compared to Alternative 1 (No Action)	—	<del>2,160</del> <u>3,465</u>	<del>1,815</del> <u>2,145</u>	<u>3,690</u>

**Exhibit 4.5-6** Anticipated Population Based on Maximum Household Size

	Alternative 1 (No Action)	Alternative 2	Alternative 3	Preferred Alternative
<b>ADU population on lots with one AADU</b>	<del>3,600</del> <u>3,280</u>	<del>2,520</del> <u>4,280</u>	<del>2,600</del> <u>3,600</u>	<u>4,280</u>
<b>ADU population on lots with one DADU</b>	<del>3,960</del> <u>4,600</u>	<del>3,760</del> <u>8,120</u>	<del>3,840</del> <u>6,160</u>	<u>8,480</u>
<b>ADU population on lots with two ADUs</b>	—	<del>7,040</del> <u>4,720</u>	<del>2,980</del> <u>1,920</u>	<u>4,960</u>
<b>Total ADU population</b>	<del>7,560</del> <u>7,880</u>	<del>13,320</del> <u>17,120</u>	<del>9,420</del> <u>11,680</u>	<u>17,720</u>
<b>Additional population compared to Alternative 1 (No Action)</b>	—	<del>5,760</del> <u>9,240</u>	<del>1,860</del> <u>3,800</u>	<u>9,840</u>

### Lot Coverage

In all alternatives, the maximum lot coverage limit would remain the same as under the current Land Use Code. On lots greater than 5,000 square feet, 35 percent of the lot area could be covered; on lots less than 5,000 square feet, 15 percent of the lot area plus 1,000 square feet could be covered.

### IMPACTS OF ALTERNATIVE 1 (NO ACTION)

Under Alternative 1 (No Action), current Land Use Code regulations for development in single-family zones would remain unchanged. We anticipate the current rate of ADU production would continue. We do not expect this trend to result in impacts to public services and utilities. Overall demand for public services and utilities would continue to increase with population growth; however, Seattle Public Utilities, Seattle City Light, Seattle Public Schools, Seattle Police Department, and Seattle Fire Department, anticipate and continue to plan for this growth.

### IMPACTS OF ALTERNATIVE 2

Alternative 2 could result in about ~~1,440~~ 2,310 additional ADUs between 2018 and 2027 compared to Alternative 1 (No Action). We anticipate that the increase in ADU production could result in about ~~2,160~~ 3,465 additional residents (and a theoretical maximum of ~~5,760~~ 9,240 additional residents) on lots with ADUs in single-family zones compared to Alternative 1 (No Action). Any population change associated with ADU production under Alternative 2 would fall within the growth considered in the Comprehensive Plan EIS. The Comprehensive Plan EIS considered the

potential impacts of 8,400 new households by 2035 in areas outside urban villages, or 16,800 new residents based on an average household size of two, and concluded that there would be no impacts to public services or utilities. The conclusions drawn in this EIS concur with that analysis. Even if ADU production under Alternative 2 resulted in about ~~2,160~~ 3,465 new residents (or a maximum of ~~5,760~~ 9,240 new residents) in Seattle, we do not anticipate impacts on the ability of Seattle Public Utilities, Seattle City Light, Seattle Public Schools, Seattle Police Department, or Seattle Fire Department to provide service.

Since 2015, Seattle's population has risen an average of 25,650 per year. The Comprehensive Plan anticipates that Seattle will need to accommodate 120,000 new residents by 2035. If Alternative 2 results in ~~2,160~~ 3,465 additional ADU residents over 10 years compared to Alternative 1 (No Action), about ~~four~~ six percent of citywide population growth would occur across about two-thirds of the city's land area. It is likely that, absent additional ADU production expected under Alternative 2, some of these residents would otherwise live elsewhere in Seattle.

## Fire and EMS

The City's existing network of neighborhood fire stations serves the current population. Compared to overall population growth in Seattle, the additional demand associated with new ADU development would be well within the Seattle Fire Department's ability to respond to and anticipate the changing needs of the city.

## Police Services

Under Alternative 2, we do not anticipate that the addition of at most ~~5,760~~ 9,240 residents between 2018 and 2027 would have an adverse impact on SPD's ability to anticipate and respond to changing needs in the city. Population growth does not directly correlate to an increased demand for police services. Therefore, Alternative 2 would not necessarily result in proportional increases in call volumes or the frequency of major crimes. Nevertheless, SPD will continue to analyze where best to focus its resources to respond to changes in demand.

## Public Schools

Under Alternative 2, we do not anticipate that the addition of up to ~~5,760~~ 9,240 residents between 2018 and 2027 would have an adverse impact on the enrollment capacity of SPS. As described above, SPS plans for

student population changes in their facility planning and is actively planning for future growth. If student enrollment did exceed capacity, SPS would typically respond by using one or a combination of the approaches listed below:

- Adjusting school boundaries to address capacity needs
- Adjusting geographic zones for option schools
- Adding or removing portables
- Adding or renovating buildings
- Opening closed buildings or schools
- Pursuing future capital programs

These typical responses to changes in enrollment would ensure that any localized changes in capacity associated with the proposed Land Use Code changes would not impact SPS.

### Seattle Public Utilities — Water

As described above, total water system usage in Seattle has declined in recent years. As a result, the City's water system currently has excess capacity. As outlined in the Comprehensive Plan EIS, new development, such as increased ADU production under Alternative 2, could increase demand on localized areas of the water supply and distribution systems. However, the water supply and distribution systems have sufficient excess capacity to handle any changes.

### Seattle Public Utilities — Sewer and Stormwater

Under Alternative 2, increased ADU production could increase demands on the local sewer collection system, downstream conveyance, and treatment facilities. Increased sewer flow is a product of increased water consumption. Greater population in the study area could increase the overall need for sewage capacity, but we do not anticipate any significant adverse location-specific impacts. Overall, increased sewer demand resulting from ADU construction will not substantially impact sewer capacity. In some specific locations within the study area, the existing wastewater system may already be at or exceed capacity. A large concentration of ADUs constructed in an area tributary to these problems could yield a corresponding rise in sanitary sewer overflows (SSO).

None of the alternatives contemplates a change to the existing maximum lot coverage limit, which is currently 35 percent for lots 5,000 square feet and larger, and 1,000 square feet plus 15 percent for lots under 5,000

square feet. Drainage review would be required for any project that would propose to disturb more than 750 square feet of land or to add or replace 750 square feet of building footprint. The Seattle Stormwater Code (SMC Chapters 22.800-22.808) and 2016 Seattle Stormwater Manual have both adopted best management practices to address potential impacts. During the scoping period, SPU reported that the proposed Land Use Code changes would not likely lead to increased amounts of impervious surfaces beyond what is currently allowed and, therefore, would not have a measurable impact on the drainage system.

### **King County Wastewater Treatment Division and SPU — Combined Sewer System**

The impacts to the Combined Sewer System would be the same as described under SPU — Sewer and Stormwater.

### **Seattle City Light — Electric Power**

Despite population growth, SCL's overall electrical load has been stable over the last 40 years because of successful energy conservation efforts and implementation of energy use requirements outlined in the Land Use Code. The increase in population anticipated under Alternative 2 would not impact the ability of SCL to meet changes in demand.

### **IMPACTS OF ALTERNATIVE 3**

Alternative 3 could result in about ~~1,210~~ 1,430 additional ADUs compared to Alternative 1 (No Action). We anticipate that the increase in ADU production could result in about ~~1,815~~ 2,145 additional residents (and a theoretical maximum of ~~1,860~~ 3,800 additional residents) on lots with ADUs in single-family zones compared to Alternative 1 As described for Alternative 2, even if this resulted in a corresponding increase in ~~1,860~~ 3,800 additional residents in Seattle, we do not anticipate impacts on the ability of Seattle Public Utilities, Seattle City Light, Seattle Public Schools, Seattle Police Department, or Seattle Fire Department to provide service

### **IMPACTS OF THE PREFERRED ALTERNATIVE**

The Preferred Alternative could result in about 2,460 additional ADUs compared to Alternative 1 (No Action). We anticipate that the increase in ADU production could result in about 3,690 additional residents (and a theoretical maximum of 9,840 additional residents) on lots with ADUs in single-family zones compared to Alternative 1 As described for

Alternative 2, even if this resulted in a corresponding increase in 9,840 additional residents in Seattle, we do not anticipate impacts on the ability of Seattle Public Utilities, Seattle City Light, Seattle Public Schools, Seattle Police Department, or Seattle Fire Department to provide service.

### **4.5.3 Mitigation Measures**

No significant adverse impacts are anticipated to public services and utilities; therefore, no mitigation measures are proposed.

### **4.5.4 Significant Unavoidable Adverse Impacts**

No significant unavoidable adverse impacts are anticipated to public services and utilities from any of the alternatives considered in this EIS.

# 5 Responses to Comments

This chapter provides responses to public comments provided on the Draft EIS during the comment period. The Draft EIS was published on May 10, 2018, with a 45-day comment period. The written comments we received are available in Appendix D. We held a Draft EIS public open house and hearing on May 31, 2018. Appendix E provides verbal and written comments received at the public hearing.

This section is structured as follows:

- 5.1 Organization of Public Comments 5-2
- 5.2 Responses to Frequent Comments 5-3
- 5.3 Responses to Comments Submitted by Email 5-20
- 5.4 Responses to Comments Submitted through the Online Comment Form 5-79
- 5.5 Responses to Form Letters and Petitions 5-329
- 5.6 Responses to Verbal and Written Comments Received at the Public Hearing 5-375

## 5.1 Organization of Public Comments

Many comments we received on the Draft EIS address common issues and themes. We first provide responses to these frequent comments in Section 5.2. Responses to individual comments often reference these responses to frequent comments.

Subsequent sections include responses to individual comments received in written form via email, the online comment form, and letter. These comments are organized in alphabetical order by last name.

For comments asking questions, requesting clarification or corrections, or concerning the Draft EIS analysis, we provide responses that explain the EIS approach, offer corrections, identify where we have supplemented the Draft EIS analysis, or provide other appropriate replies. We acknowledge comments expressing an opinion, a preference, or general support or opposition to the proposed Land Use Code changes with a response indicating that we have noted the comment.

## 5.2 Responses to Frequent Comments

Exhibit 5-1 Summary of Frequent Comment Topics

Topic	Description of comments
<b>Request for greater flexibility than contemplated in Alternative 2 or 3</b>	Proposal should include policies like eliminating the minimum lot size requirement, allowing two or three ADUs on a single lot, increasing the maximum ADU size to 1,500 square feet, or removal of other regulations.
<b>Individual neighborhood review</b>	Each single-family neighborhood in Seattle is unique. The EIS does not consider the unique characteristics of each neighborhood in its analysis of potential impacts. Impacts to each neighborhood should be examined individually.
<b>Impacts to water, drainage, and sewer systems</b>	There will be impacts to the water, sewer and stormwater, and drainage systems due to the proposal.
<b>Housing affordability</b>	The proposal does not have an impact on housing affordability.
<b>Proposal provides insufficient housing options</b>	The proposal should go further than encouraging ADUs to address Seattle's housing shortage.
<b>Multifamily zoning</b>	The proposal would allow multifamily residential uses (e.g., triplexes) on all lots in single-family zones.
<b>Estimates of ADU production and single-family teardowns</b>	The EIS underestimates the number of ADUs that would be created and single-family houses that would be demolished under the proposal.
<b>Parking impacts</b>	The EIS underestimates how the proposal would affect parking availability. The analysis does not adequately address impacts to on-street parking and ignores conditions in denser, more central neighborhoods.
<b>Tree canopy impacts</b>	The EIS underestimates impacts on tree canopy and vegetation.
<b>Short-term rentals</b>	Some or all ADUs will be used as short-term rentals through platforms like Airbnb or VRBO.
<b>King County sewage treatment capacity charge</b>	The King County sewer capacity charge is too high for DADUs.
<b>Permit fees</b>	The City should waive or reduce permit fees for ADUs.
<b>Other barriers to ADU development</b>	Land Use Code changes are insufficient to reduce the barriers owners face to creating ADUs.
<b>Positive impacts</b>	The EIS does not include sufficient discussion of the positive impacts of the proposal.

## REQUEST FOR GREATER FLEXIBILITY THAN CONTEMPLATED IN ALTERNATIVE 2 OR 3

**Proposal should include policies like eliminating the minimum lot size requirement, allowing two or three ADUs, increasing the maximum ADU size to 1,500 square on a single lot feet, or removal of other regulations.**

As described in Section 1.2, Proposal Objective, the proposed action evaluated in this EIS is intended to remove regulatory barriers to the creation of ADUs and increase the number and variety of housing choices available in Seattle's single-family zones. While further Land Use Code changes beyond those contemplated in Alternative 2, Alternative 3, or the Preferred Alternative analyzed in this Final EIS could advance the second of those two objectives by allowing even greater housing production, the first objective calls for strategies to promote *accessory dwelling units*. Therefore, changes suggested in Draft EIS comments that would effectively allow creation of new *principal dwelling units*, such as modifying the minimum size for subdividing land in single-family zones to create new lots or rezoning to Residential Small Lot (RSL), are outside the scope of this proposal.

Some Draft EIS comments suggested further changes to encourage accessory units specifically. A few of these suggestions have been incorporated as features of the Preferred Alternative. We carry forward the floor area ratio (FAR) limit studied in Alternative 3, which would encourage ADU creation, address concerns about the scale of new single-family development, and reduce demolition of principal structures. Likewise, in addition to an AADU and a DADU, the Preferred Alternative would allow two AADUs on a lot.

Other comments called for policies we have not incorporated in the Preferred Alternative. The action alternatives considered in this EIS primarily resemble draft legislation that the City Council developed in 2015, which was intended to address the most frequently cited regulatory barriers to ADU development. Since that draft, we have incorporated additional changes for consideration in the EIS based on public input. The Preferred Alternative reflects a range of perspectives on ADUs, including concerns raised during the scoping process for this EIS and comments received on the Draft EIS. As one example, while eliminating the minimum lot size for a DADU could remove a regulatory barrier to creating housing, we also hear concerns about greater bulk or density on small lots. For the Preferred Alternative, we considered multiple factors, including the

critical need for housing in Seattle, the existing context and pattern of development in the study area, and concerns about privacy and the scale of development in single-family zones.

The City can consider implementing other changes to the Land Use Code beyond the Preferred Alternative as part of a separate proposal that will have its own environmental review process. The analysis in this EIS could inform future environmental review.

## INDIVIDUAL NEIGHBORHOOD REVIEW

**Each single-family neighborhood in Seattle is unique. The EIS does not consider the unique characteristics of each neighborhood in its analysis of potential impacts. Impacts to each neighborhood should be examined individually.**

This EIS is a programmatic environmental impact statement. SEPA does not require that the City prepare separate analyses or documents for each ADU constructed. This EIS uses an appropriate level of analysis to evaluate the effects of a broad proposal that may include numerous individual projects, implemented over a long timeframe, and/or across a large geographic area.

For programmatic proposals, including areawide zoning and land use changes like the proposed action, SEPA Rules require only that an EIS contain a general discussion of the impacts of alternative proposals for plans, land use designations, or implementation measures. SEPA does not require site-specific analyses for individual geographic areas (WAC 197-11-442[3] and [4]). Therefore, analyzing impacts of the proposed Land Use Code changes at a broader scale is appropriate.

To understand the effects of this broad proposal, the EIS contains substantial information and analysis about, and based on review of, generalized variations among individual neighborhoods, subareas, and parcels. While these analyses do not specifically review every possible individual scenario, they provide sufficient information to understand the types and magnitude of impacts that could result in a broad range of cases. The highest and best use analysis in Section 4.1, Housing and Socioeconomics, relies on pro formas that consider varying market conditions by neighborhood area (see Exhibit 4.1-10). We developed and used a parcel typology that accounts for variation in parcel characteristics across the study area (see Exhibit 4.1-11). We present the frequency of these parcel types in each single-family neighborhood, so findings

that vary by parcel type can be understood in the context of actual neighborhood conditions (see Exhibit A-23).

The parking analysis also considers differing neighborhood-level conditions. We used empirical data on parking utilization and availability gathered through parking studies in four representative neighborhoods (see Exhibit B-1). The transportation section identifies unimproved sidewalks across the entire study area (see Exhibit 4.4-6). We present the existing transit network and illustrate areas of Seattle according to their proximity to frequent transit (see Exhibit 4.4-10, Exhibit 4.4-11, and Exhibit 4.4-12).

The aesthetics analysis similarly examines the proposal's likely effects on a range of parcel configurations. This includes considering various parcel sizes, location on the block (e.g., an interior lot or corner lot), and whether the parcel does or does not have alley access.

Chapter 3, Housing and Planning Context, discusses and presents several exhibits that illustrate the variation in cultural, economic, and social conditions across Seattle. In particular, Exhibit 3-12 shows population by race, and Exhibit 3-15 shows housing tenure across the city. Exhibit 4.1-16, Exhibit 4.1-18, and Exhibit 4.1-19 present further information about demographic and socioeconomic variation across neighborhoods in the study area.

## **IMPACTS TO WATER, DRAINAGE, AND SEWER SYSTEMS.**

### **There will be impacts to the water, sewer and stormwater, and drainage systems due to the proposal.**

Section 4.5, Public Services and Utilities, discusses how City and County utilities plan for population growth and the potential effects of additional ADU production and resulting population increase on the availability of public services and utilities. The review in the EIS of water, drainage, and sewer systems suggests that no significant impacts are likely to result from the 2,460 additional ADUs anticipated under the Preferred Alternative compared to Alternative 1 (No Action).

Even during a period of historic growth in Seattle, total usage of the water system has declined in recent years, in part due to conservation efforts like encouraging low-flow fixtures in new development. Seattle's water system currently has excess capacity. Seattle Public Utilities (SPU) develops long-range plans for maintaining and upgrading the water system based on growth forecasts from the Puget Sound Regional Council

(PSRC) and Washington State Office of Financial Management (OFM). While concentrated ADU production in a particular area could increase demand on localized parts of the water supply and distribution systems, they have sufficient excess capacity currently to withstand the additional population anticipated under the Preferred Alternative, as described in Section 4.5.2.

Water conservation measures have also led to a reduction in discharges to the sanitary sewer. For that reason, the Preferred Alternative would generally not be expected to exceed the total design assumptions for sanitary waste (which assumes no water conservation) in residential zones. After reviewing the alternatives evaluated in this EIS, SPU concluded that increased sewer demand resulting from ADU construction will not substantially impact sewer capacity.

SPU also designs and maintains drainage systems based on assumptions about the type and amount of developed land cover and characteristics of weather events like frequency, duration, and intensity. Future weather events are constant across all alternatives. All alternatives also share the same maximum lot coverage limit; no change to this standard is contemplated under any alternative. From its review, SPU concluded that consistency with existing lot coverage regulations suggests that none of the alternatives would result in increased area of impervious surfaces beyond what is already allowed under single-family zoning. SPU therefore found that none of the alternatives is likely to have a measurable impact on the drainage system.

## HOUSING AFFORDABILITY

### **The proposal does not have an impact on housing affordability.**

As described in Section 1.2, the objectives of the proposed Land Use Code changes are to remove regulatory barriers to make it easier for property owners to permit and build ADUs and to increase the number and variety of housing choices in single-family zones. Section 4.1, Housing and Socioeconomics, describes how the proposal could also have slight benefits for housing affordability by increasing housing supply, increasing the number of smaller homes available, increasing income for homeowners operating ADUs as rentals, and reducing the number of existing homes demolished compared to Alternative 1 (No Action).

The terms *affordable housing* and *housing affordability* are used in both formal and informal contexts, and definitions can vary greatly.

Generally, *affordable housing* refers to housing (often with income and rent restrictions) that a lower-income household can afford. *Housing affordability* refers to a broad set of issues and actions related to the relationships among housing production costs, housing prices, and local demographic needs.

Two types of affordable housing exist: regulated affordable housing and private market affordable housing. Regulated affordable housing typically relies on public subsidy, targets households with incomes at a particular level, and has legally restricted rents or sales prices to provide affordability for those households. Regulated affordable housing can be publicly or privately (i.e., non-profit and for-profit) owned and found in a wide range of neighborhoods and building types. In all cases, creating affordable housing requires proactive public policy and/or investment. Private market affordable housing (or low-cost market-rate housing) is provided at an affordable price on the open market without subsidy or legal restriction.

Housing affordability is typically measured as the relationship between housing price and household income. An affordable home is one a household can afford and have sufficient remaining income for basic needs like transportation, food, and healthcare. A common definition for affordability is housing whose monthly costs do not exceed 30 percent of household income. Housing affordability is therefore a function of income and housing costs for each individual household, which can vary substantially given the unique circumstances of a household and housing unit.

Median household income is a standard measure of income that varies by geography and household size and comes from U.S. Census Bureau data. For programs it administers, the Department of Housing and Urban Development (HUD) establishes median household income thresholds based on household size. In Seattle, for example, using these HUD guidelines, the Office of Housing considers \$1,505 to be affordable rent for a one-bedroom unit for a household whose income is 80 percent of the area median income (AMI). For a household with an income of 30 percent of AMI, the affordable rent for a one-bedroom unit is \$563.

ADU production analyzed in this EIS represents market-rate units, with rents set by the property owner. This EIS does not analyze the creation of rent- and income-restricted ADUs. (See Section 3.2 for information on separate City efforts to support equity and affordability through ADUs.) Some ADUs might provide relatively lower-cost housing choices in the study area. ADU rental rates tend to be lower due to the characteristics

of the units (e.g., small size). ADU rents are generally determined by what tenants are willing to pay, not by the property owner's cost to build the unit. Development cost is often an important factor in the decision of whether to build an ADU, but it generally does not determine rent. A 2014 study by the Oregon Department of Environmental Quality of ADUs in Portland, Oregon, found median rent for attached and detached ADUs is slightly below Portland's median rent for studio, one-bedroom, and two-bedroom apartments. Our survey of Seattle ADUs listed on Craigslist in October–November 2017 found an average monthly rent for one-bedroom unfurnished ADUs of \$1,420, 14 percent lower than the citywide average of \$1,645.<sup>1</sup>

Even when their rents are not affordable to low-income households, ADUs contribute to housing goals by increasing the overall supply of housing in Seattle and the number of housing choices available in single-family zones specifically. These additional housing options allow more people to access Seattle neighborhoods and help to address the scarcity that pushes housing prices upward.

ADUs can also allow homeowners to generate rental income that offers financial stability. An ADU can provide housing for a family member whom a homeowner otherwise supports by paying for rent elsewhere. The ADU might house a family member or caregiver who provides childcare or other services that offer value to the homeowner. Nevertheless, as the EIS acknowledges in Section 4.1.2, high construction costs mean that most households able to create an ADU are disproportionately wealthy or have access to substantial equity in their home. This phenomenon will likely persist absent other actions beyond Land Use Code changes to reduce costs and support lower-income households. As described in Section 3.2, Planning Context, the City is considering such programmatic strategies for advancing equity and affordability goals through ADUs.

## PROPOSAL PROVIDES INSUFFICIENT HOUSING OPTIONS

### **The proposal should go further than encouraging ADUs to address Seattle's housing shortage.**

Seattle currently suffers from an acute housing shortage of both market-rate and income-restricted affordable housing. Numerous measures discussed in Section 4.1, Housing and Socioeconomics, illustrate the

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<sup>1</sup> Citywide average from Costar for one-bedroom units, Q4 2017.

degree of the housing crisis: More than one-third of Seattle households pay 30 percent or more of their income on housing costs. Ninety-two percent of single-family rentals are unaffordable to households earning 80 percent of the area median income. Income, homeownership, and wealth all present disparities by racial and ethnic group.

As described in Section 3.2, Planning Context, the City is currently exploring strategies beyond Land Use Code changes to support ADU production and affordability goals. The City is also pursuing other actions related to housing affordability beyond encouraging ADUs, many of them identified in the 2015 recommendations of the Housing Affordability and Livability Agenda (HALA) Advisory Committee, such as implementation of Mandatory Housing Affordability (MHA) requirements for new development.

Under all alternatives studied in this EIS, however, housing affordability will likely continue to be a challenge for many current and prospective Seattle residents, especially for lower-income households and renter households, and especially in the study area for this EIS. While the additional ADU production anticipated under the Preferred Alternative would create new housing choices and reduce upward pressure on housing costs compared to Alternative 1 (No Action), other actions — including land use changes in the study area, investments in rent- and income-restricted housing, and programmatic strategies to support lower-income homeowners and renters — are likely necessary under any alternative to address Seattle's housing challenges fully.

## MULTIFAMILY ZONING

### **The proposal would allow multifamily residential uses (e.g., triplexes) on all lots in single-family zones.**

As described in Chapter 2, Alternatives, Alternative 1 (No Action) represents current regulations for development in Seattle's single-family zones. Under today's existing rules, all lots in single-family zones can have an ADU. A lot can have either an attached ADU or, depending on lot size, a detached ADU. The Preferred Alternative would allow two ADUs on one lot and would modify the minimum lot size required for a DADU.

The Land Use Code (i.e., Title 23 of the Seattle Municipal Code) includes specific definitions for "Residential use." Under this definition, a "single-family dwelling unit" means a detached structure that has a permanent foundation, contains one dwelling unit, plus its associated authorized

accessory dwelling unit or detached accessory dwelling unit. In other words, the code considers an ADU to be part of the single-family dwelling unit. (As part of the proposed action evaluated in this EIS, we would amend this definition to encompass a principal dwelling unit and one or two ADUs.) By contrast, "multifamily residential use" means a use consisting of two or more principal dwelling units in a structure or portion of a structure, excluding accessory dwelling units. A "dwelling unit" is a room or rooms occupied by one household as living accommodations.

These terms thus differentiate a lot in a single-family zone with one or two accessory dwelling units from multifamily uses comprising two or three principal dwelling units. The latter are typically called "duplexes" and "triplexes," which the code defines, respectively, as a single structure containing only two dwelling units, neither of which is an accessory dwelling unit, and a single structure containing three dwelling units.

How is a lot with an ADU different from a building with multiple principal dwelling units? Aside from definitions in the code, certain land use regulations further distinguish multifamily development from the type of development allowed in single-family zones under the Preferred Alternative. First, ADUs have size limits that do not apply to principal dwelling units. The Preferred Alternative would restrict ADUs to 1,000 square feet, while single-family homes and multifamily housing types like townhomes and apartments generally have no size limit (though the Preferred Alternative would limit the size of a single-family home to 2,500 square feet or half the lot size, whichever is greater). Second, rules for land division differ in single-family and multifamily zones. Minimum lot sizes regulate subdivision in single-family zones, while multifamily zones generally have no minimum lot sizes. This means that, in a single-family zone, a 5,000-square-foot lot with a DADU cannot be divided into two lots and separately owned. In a multifamily zone, a 5,000-square-foot lot could be divided into multiple lots, each sold to a separate owner. Third, a lot in a single-family zone, with or without ADUs, can be occupied by only one household, defined as any number of related people or up to eight unrelated people; the Preferred Alternative would allow a household comprising 12 unrelated people on a lot with two ADUs. In a multifamily development, however, each unit can contain a household; a duplex and triplex, therefore, can contain two and three households, respectively, or up to 16 and 24 unrelated people.

## ESTIMATES OF ADU PRODUCTION AND SINGLE-FAMILY TEARDOWNS

### **The EIS underestimates the number of ADUs that would be created and single-family houses that would be demolished under the proposal.**

We are not aware of any other empirically based estimates of ADU production or demolition of single-family houses that would provide a basis for asserting that the approach used in this EIS categorically underestimates those figures. The methodology used in this EIS and described in Section 4.1, Housing and Socioeconomics, and Appendix A draws on the most current permit data and represents a reasonable approach using the best available information to estimate ADU production. It incorporates empirical data about past development events; applies econometric methods to analyze the parcel-level factors that predict ADU production; considers the effects of regulations under each alternative; and includes conservative adjustments to account for new policies not reflected in available parcel data, such as allowing two ADUs on one lot. Some barriers to ADU development exist outside Land Use Code regulations, like the cost to construct an ADU. While proposed City programs to reduce DADU construction costs are independent of this proposal, the Final EIS considers DADU construction cost reductions to ensure our impacts analysis is based on our best estimate of future conditions.

Section 4.1, Housing and Socioeconomics, describes the forecast model we use to estimate the number of ADUs and single-family teardowns we could expect under each alternative. In brief, the model (1) analyzes historical development data to discern the factors and characteristics associated with ADU creation and single-family teardowns, (2) develops a baseline forecast for Alternative 1 (No Action) by updating underlying variables for the 2018-2027 period to match regional growth projections, and (3) develops forecasts for each action alternative by modeling its Land Use Code changes. We then apply adjustment factors that further increase the estimates of ADU production to account for factors not included in the forecast model. Section 4.1, Housing and Socioeconomics, and Appendix A describe this methodology in greater detail. In this Final EIS, this methodology yields 10-year estimates of 1,970 to 4,430 ADUs and 2,030 and 1,580 demolitions of principal structures for Alternative 1 (No Action) and the Preferred Alternative, respectively.

While we expect more ADUs under all action alternatives compared to Alternative 1 (No Action), we also anticipate the number of teardowns would decrease. This occurs for multiple reasons. First, as noted in the description of the forecast model and its results on page 4-18, empirical permit data suggests that property owners tend to decide between adding an ADU and tearing down and rebuilding a house. Therefore, regulatory changes that increase the relative feasibility of ADU development also increase the likelihood that property owners in the future decide to create an ADU instead of demolishing the house. In other words, flexibility for creating ADUs gives homeowners more options to use their land and meet their changing household needs in place, rather than selling and/or tearing down the house. Second, Alternative 3 and the Preferred Alternative both include an FAR limit that would lower the maximum allowed size of new single-family houses. This reduces the incentive to demolish an existing house in order to build a new house because that new house cannot be as large as allowed under Alternative 1 (No Action).

SEPA requires consideration of probable impacts, defined in WAC 197-11-782 as likely or reasonably likely to occur. SEPA does not require consideration of every remote and speculative consequence of an action (RCW 43.21C.110). By using an appropriate methodology for estimating real estate feasibility and best available data for forecasting future ADU production, this Final EIS evaluates the likely outcomes for each alternative.

## **PARKING IMPACTS**

**The EIS underestimates how the proposal would affect parking availability. Impacts to on-street parking are not adequately addressed and ignores conditions in denser, more central neighborhoods.**

Section 4.4 describes our methodology for analyzing potential parking impacts likely to occur under each alternative. The analysis relies on and is consistent with the ADU production estimates developed for the housing and socioeconomics analysis and described in Section 4.1, Housing and Socioeconomics. In brief, we compare the existing availability of on-street parking with the expected increase in demand for on-street parking in each alternative. The increase in demand reflects the ADU production rates expected for the 2018-2027 period and estimates of vehicle ownership rates for ADU residents. Finally, we use empirical parking data collected in four study locations throughout Seattle to

identify potential impacts and evaluate the extent to which impacts from the action alternatives could vary geographically. Section 4.4, Parking and Transportation, and Appendix B describe this methodology in greater detail.

The findings in Section 4.4 conservatively evaluate how the proposal would affect on-street parking availability. While the ADU production estimates in Section 4.1, Housing and Socioeconomics, indicate that the percentage of parcels with ADUs would vary according to several variables, we conservatively use the upper end of this range to evaluate parking availability in each study location. Likewise, we assume that all ADU residents would park on the street, even though some alternatives require off-street parking for new ADUs, and even though some property owners might have existing parking spaces or elect voluntarily to create one even if not required. Further, this Final EIS discloses that, if a particular block has a concentration of ADUs and/or if currently parking utilization is particularly high, localized impacts on parking availability could occur.

The four study locations are identified in Appendix B. We chose these locations to examine different geographic areas of Seattle and to represent a range of conditions found in single-family zones, including lots of various sizes; blocks with and without alleys, driveways, and sidewalks; and various levels of transit service. Many areas outside these study locations resemble the conditions found within the study locations. Please see Exhibit B-3 through Exhibit B-14, which provide maps of each parking study location, illustrate the distribution of lot sizes in each study location, and compare this distribution to the EIS study area overall. In general, the parking study locations represent a range of conditions in terms of lot sizes, resembling conditions found in the entire EIS study area. To the extent that there are areas distinctly different than the study locations, the EIS discloses that, within a specific context or location, localized impacts on parking availability could occur.

## TREE CANOPY IMPACTS

### **The EIS underestimates impacts on tree canopy and vegetation.**

The land use analysis in Section 4.2, Land Use, includes information and analysis related to tree canopy and vegetation. Based on feedback on the Draft EIS, this Final EIS includes several additions to this analysis. We added Exhibit 4.2-8 to show tree canopy coverage in the study area based on the most current data available. Using a 2016 LiDAR

dataset, we compared average tree canopy coverage on study area parcels with DADUs, without DADUs, and with new single-family houses constructed since 2010. We also added more description of current tree regulations from Chapter 25.11 of the Land Use Code, and information about proposed updates to Seattle's tree policies that the City Council is currently considering.

The Preferred Alternative analyzed in this Final EIS also incorporates several features intended to minimize potential impacts on tree canopy and vegetation. The proposed increase in the rear yard coverage limit for a one-story DADU would be allowed only if DADU construction does not result in tree removal. Flexibility in the rear yard requirement would allow property owners to site DADUs in a way that eliminates or minimizes impacts on trees. The City will also clarify the requirement that site plans submitted with ADU permit applications must show the location of trees on the lot so that permit reviewers can consider tree impacts. Creating an off-street parking space often involves converting a vegetated part of one's property into an impervious surface. Removing the off-street parking requirement could reduce the amount of tree canopy and vegetation otherwise needed to accommodate a parking space.

## SHORT-TERM RENTALS

### **Some or all ADUs will be used as short-term rentals through platforms like Airbnb or VRBO.**

In 2017, the City Council enacted new regulations for short-term rentals. In Section 3.2, Planning Context, we describe this recent legislation in more detail. The short-term rental regulations allow a licensed short-term rental operator to offer one dwelling unit as a short-term rental, or two dwelling units if one is the operator's primary residence. Currently, in single-family zones, an operator could offer both the main house and an ADU as short-term rentals only if one is the operator's primary residence. Under the Preferred Alternative, a lot could have two ADUs. Seattle's short-term rental regulations would not allow the main house and both ADUs to be used as short-term rentals. Further, if the owner does not occupy the house or ADU, only one unit could be offered as a short-term rental.

The housing analysis described in Section 4.1, Housing and Socioeconomics, considers these regulations when comparing various ways to value development outcomes on a single-family lot under each alternative. In addition to the limits established in the short-term rental regulations, we evaluated whether offering an ADU as a short-

term rental was likely to be more profitable than as a long-term rental. (See Appendix A for details on the methods used to evaluate different valuation options, including short-term rentals.) Exhibit A-28, Exhibit A-33, Exhibit A-38, and Exhibit A-43 show that, across all alternatives, it is generally more profitable to rent an ADU as a long-term rental. This is true for all three market areas and all four parcel prototypes we evaluated. While the results of this valuation analysis do not mean that *no* homeowners will choose to use their ADU as a short-term rental, they suggest that short-term rentals are not likely to be the most profitable way that property owners can use their ADUs. (Some property owners will nonetheless choose to offer their ADUs as short-term rentals for reasons of preference or flexibility, as is true of owners of single-family houses.) Further, the results suggest that the action alternatives do not increase the likelihood that ADUs in Seattle would be used as short-term rentals compared to Alternative 1 (No Action).

## **KING COUNTY SEWAGE TREATMENT CAPACITY CHARGE**

### **The King County sewer capacity charge is too high for DADUs.**

Since 1990, King County has levied a capacity charge on structures with new connections to the sanitary sewer system. Property owners in Seattle and other cities in King County establishing a DADU are required to pay this charge, which in 2018 amounts to \$11,268 paid monthly for 15 years. Currently, a new DADU and a new single-family residence receive the same capacity charge.

We include this fee in our pro forma analysis as one of several cost inputs for new ADUs or single-family houses. In the Draft EIS, Alternative 2 considered a reduction of 10 percent in predevelopment costs for DADUs. Although we applied a 10-percent reduction to costs including the King County sewage treatment capacity charge, this reduction did not reflect a specific proposal to lower costs. Rather, it represented a theoretical reduction that could be implemented through various mechanisms or actions that helped us understand how ADU production might increase. In this Final EIS, all alternatives incorporate a cost reduction based on ongoing City efforts to develop pre-approved plans and other potential actions to reduce cost.

Because the City does not administer this charge or control its rate structure, the City cannot unilaterally or independently modify its application or the fee charged as part of developing an ADU. However, in 2017 King County began a comprehensive review of how its capacity

charge is allocated to newly connecting customers. While the amount of the charge has been updated continually over time, the way it is allocated to different building types has not been evaluated since 1990. Since then, new building types have emerged that use water in different ways, including AADUs and DADUs. As a result, the County is conducting a study on how the capacity charge is allocated to different building types with the goal of graduating the charge to reflect the amount of wastewater that each type of building tends to discharge.

When we issued this Final EIS, the County had formed and was working with a Capacity Charge User Classification Work Group for this study. Seattle Public Utilities is part of this group. Through conversations with builders and other stakeholders and by reviewing data from several local agencies, the working group is evaluating which features reflect the amount of wastewater a building's occupants will eventually generate. These features include square footage, number of bedrooms, number of plumbing fixtures, water meter capacity, and unit type. Currently, the capacity charge for residential development is based solely on the number of units.

Through a separate study, King County is also exploring assistance for low-income customers. The County expects to share findings from both studies in late 2018 or early 2019.

## **PERMIT FEES**

### **The City should waive or reduce permit fees for ADUs.**

A fee is required to apply for a permit to establish an ADU. The cost of the permit depends on the size and complexity of the project, how long it takes to review, and additional permits that might be required.

Waiving or reducing permit fees for a certain project type would require that the City's general fund resources be used to subsidize the permits for those projects. Because Seattle Department of Construction and Inspections (SDCI) permit staff must review an ADU application, waiving the associated fee means that General Fund revenue needed to support other City services would pay for the review.

Permit fees are based in part on the time required to review the application, however. Therefore, efforts to reduce permitting time in turn reduce permit fees. As described in Section 3.2, Planning Context, the City is exploring options for developing standard DADU designs that SDCI permitting staff would review and pre-approve. Homeowners interested

in creating a DADU could save time and money by using a pre-approved plan due to a faster plan review process and reduced permit fees.

## **OTHER BARRIERS TO ADU DEVELOPMENT**

### **Land Use Code changes are insufficient to reduce the barriers owners face to creating ADUs.**

Regulatory barriers are just one of several factors constraining ADU production. Other barriers include high construction costs; the challenge of obtaining financing and the limited number of financing tools available for ADUs; the duration and complexity of the permitting process; managing a construction project; and operating a rental unit. Efforts to address some of these other barriers are underway. Section 3.2, Planning Context, describes several programmatic strategies the City is exploring to reduce barriers beyond changes to Land Use Code regulations.

The City is exploring options for developing pre-approved DADU designs that could streamline the permitting process and save time and money for homeowners. New resources and tools could help homeowners explore DADU designs and understand the feasibility of adding an ADU to their property. A programmatic or financial partnership between the City and a nonprofit lender or other organization could improve access to ADU financing for homeowners. Likewise, innovation in the private sector could lower construction costs, or simplify the development and tenanting process for homeowners.

As described in the response above related to how we estimate the number of ADUs in each alternative and in Section 4.1, Housing and Socioeconomics, the ADU production estimates reflect reasonable assumptions about potential cost reductions that could increase the number of ADUs created under each alternative.

## **POSITIVE IMPACTS**

### **The EIS does not include sufficient discussion of the positive impacts of the proposal.**

SEPA requires that an agency prepare an EIS for proposals likely to have significant adverse impacts on the environment. Consistent with SEPA, the analysis in the EIS focuses on the environmental resources most likely to be impacted by the proposal as identified during the scoping period and in the Hearing Examiner's decision from December 2016.

Nevertheless, several comments on the Draft EIS recommended that we discuss positive impacts of the proposal in greater depth. As appropriate, the positive impacts of the proposal are discussed throughout the EIS; however, SEPA Rules state that the beneficial aspects of a proposal shall not be used to balance adverse impacts in determining significance.

## 5.3 Responses to Comments Submitted by Email

This section provides responses to Draft EIS comments provided by email. Copies of the email comments we received are available in Appendix D.

**Exhibit 5-2** Commenters Providing Comments by Email

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<b>Bartfield, Esther</b>	5-26
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<b>Bloomquist, Al</b>	5-29
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## RESPONSES TO COMMENTS SUBMITTED VIA EMAIL

### 350 Seattle

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response concerning the proposal's positive impacts.
- 3 Thank you for your comment. The comment is noted.
- 4 Please see Chapter 2, Alternatives. The Preferred Alternative would allow at least one ADU; two ADUs would be permitted if the property is under the same ownership for at least one year. Please also see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.
- 5 Please see Chapter 2, Alternatives. The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 6 Please see Chapter 2, Alternatives. The Preferred Alternative would remove the owner-occupancy requirement. A minimum of one year of continuous would be required to establish a second ADU on a lot that already has an ADU.
- 7 The minimum lot size for DADUs in the Preferred Alternative would be reduced from 4,000 square feet to 3,200 square feet. Please also see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.
- 8 Please see Chapter 2, Alternatives. The Preferred Alternative would increase the maximum size of a DADU to 1,000 square feet, excluding storage and parking areas.
- 9 The maximum height for DADUs in the Preferred Alternative would be increased 1-3 feet depending on lot width. Please also see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.
- 10 DADUs can be located in front of the main house if it is outside of the required front yard. Please see Exhibit 2-6 that illustrates required yards in single-family zones.
- 11 Please see the frequent comment response regarding requests for greater flexibility than contemplated in Alternative 2 or 3.
- 12 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative does not include an affordability requirement.
- 13 Please see Chapter 2, Alternatives, for a description of what is included related to reducing costs, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 14 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The proposed FAR limit included in the Preferred Alternative incentivizes production of ADUs by exempting any floor area in an ADU (both attached and detached).

## Abolins, Talis

- 1 Please see Section 4.2, Land Use. This section has been updated to include a discussion of historic resources.
- 2 The proposal in this EIS to revise the Land Use Code related to accessory dwelling units is unrelated to the adoption of MHA as analyzed in the [MHA EIS](#).

## Aderhold, Eric

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes removing the off-street parking requirement and removing the owner-occupancy requirement.
- 3 Please see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.
- 4 Please see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.
- 5 Please see Chapter 2, Alternatives, for a discussion of what is studied in the action alternatives. This includes considering an increase in maximum household size.
- 6 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative, including allowing both an AADU and a DADU on the same lot.
- 7 Please see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.

## AIA

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative, which includes allowing two ADUs (either two attached or one attached and one detached).
- 3 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. This includes removing the off-street parking requirement.
- 4 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. This includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet.
- 5 The Preferred Alternative includes allowing some additional height for a DADU. Height limits would be one to three feet higher than existing limits, depending on lot width. One to two additional feet would be allowed for a DADU that incorporates green building strategies.
- 6 The Preferred Alternative includes allowing for additional rear yard coverage for a single-story DADU provided construction does not result in tree removal.

- 7 The Preferred Alternative would increase the maximum size of a DADU to 1,000 square feet.
- 8 Please see Chapter 2, Alternatives, for a description of what is included related to reducing costs, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 9 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes exempting floor area in an ADU from the maximum FAR calculations to incentivize ADUs and allows for some additional height for DADUs that incorporate green building features.

### **Allegro, Justin**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Please see Section 3.2, Planning Context, for added discussion about short-term rentals.

### **Anderson, David — 1**

- 1 Thank you for your comment. The comment is noted.
- 2 The proposal in the Draft EIS pertains to proposed changes to the Land Use Code related to ADUs. Changing the zoning designations within neighborhoods or throughout the city is outside of the scope of the EIS.
- 3 The proposal in the Draft EIS pertains to proposed changes to the Land Use Code related to ADUs. Changing the zoning designations within neighborhoods or throughout the city is outside of the scope of the EIS.

### **Anderson, David — 2**

- 1 Thank you for your comment. The comment is noted.
- 2 The proposal in the Draft EIS pertains to proposed changes to the Land Use Code related to ADUs. Changing the zoning designations within neighborhoods or throughout the city is outside of the scope of the EIS.

### **Bartfield, Esther**

- 1 Alternative 1 - No Action, considers impacts from existing regulations; this alternative only allows one ADU. This suggestion would not meet the proposal's objective to increase the number and variety of housing choices in single-family zones and therefore is not included as an alternative in the EIS.
- 2 Please see the frequent comment response regarding individual neighborhood review.
- 3 Please see Section 4.1, Housing and Socioeconomics, for discussion and analysis of the owner-occupancy requirement.

- 4 MHA requirements are considered in the 2017 [MHA EIS](#) and are outside the scope of this EIS. MHA upzoning occurs outside of single family zones and is therefore, not part of the cumulative impact analysis in this EIS.
- 5 See Appendix A for detailed methodology for how we arrived at the conclusions regarding potential teardowns and the frequent comment response on the estimates of ADU production and single-family teardowns.
- 6 Please see the frequent comment response concerning housing affordability.
- 7 Please see the frequent comment response concerning impacts to parking.
- 8 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use. In addition, please see Chapter 2, Alternatives, for a description of lot coverage requirements. As established in Seattle Municipal Code 23.44.010, the maximum lot coverage varies by lot size. For lots under 5,000 square feet, the maximum lot coverage allowed for principal and accessory structures is 1,000 square feet plus 15 percent of lot area. The maximum lot coverage for a lot of any size is not proposed to be changed; adding a DADU to a 3,200-square-foot lot would require that the main house and any other structures on the lot have not already exceeded the maximum lot coverage allowed.
- 9 As described in Section 4.3, Aesthetics, under Alternative 2 the minimum lot size on which an ADU could be constructed would be reduced to 3,200 square feet. The hypothetical two-block scene includes about 20 lots between 3,200 and 3,999 square feet. The primary aesthetic impact of lowering the minimum lot size would be an increase in visual bulk and scale on lots that cannot have a DADU under current regulations. Because houses on lots under 4,000 square feet tend to be smaller, it's also possible that DADUs on such lots would be more visible from the street when compared to larger lots. However, other development standards, such as maximum lot coverage limits, would continue to regulate the location and scale of DADUs. On lots under 4,000 square feet, the maximum lot area that could be covered (equal to 1,000 square feet plus 15 percent of the lot area) would limit the size of DADUs or, in some cases, preclude their construction altogether.
- 10 See Appendix A for detailed methodology for how we arrived at the conclusions regarding potential teardowns and the frequent comment response on the estimates of ADU production and single-family teardowns.
- 11 See Appendix A for detailed methodology regarding parcel types.
- 12 The EIS analyzes how each alternative could affect the maximum residual land value of each combination of parcel type and neighborhood. (Residual land value is the developer's land budget for a particular project. Increases to residual land value indicate the potential for increases in property values.) Please see Section 4.1, Housing and Socioeconomics, and Appendix A for discussion of potential changes to property values under each alternative. We have added additional analysis and discussion of potential property tax implications as part of this Final EIS.

As shown in Exhibit A-44, in higher- and medium-price neighborhoods, the amount a developer could afford to pay for land increases for parcel types C and D, suggesting that property values could increase for those properties. Smaller parcel types (A and B) in higher- and medium-price neighborhoods show minimal changes across the four alternatives. In lower-price neighborhoods, the amount a developer could afford to pay shows only small changes across the four alternatives, suggesting minimal change in property values. As discussed in Section 4.1, Housing and Socioeconomics, risk of displacement is generally higher in lower-price neighborhoods, so those at greatest risk of displacement will generally be less effected by any changes in property values.

However, changes to residual land value do not directly impact property tax bills, for several reasons.

First, we use residual land value to better understand the underlying economics of the ADU provisions contemplated in the EIS. Changes in property valuations (used for tax assessments) will only show up to the extent that the potential for ADU creation results in increased sales prices, which is determined by ADU production rates and individual homebuyer and investor decisionmaking. It is not possible to use the residual land value analysis to directly forecast changes in property tax assessments. Second, actual property tax payments are a function of how properties are valued by the assessor and in conjunction with rules for levying property taxes in the State of Washington. The King County Assessor assesses residential properties each year based on a complex statistical estimate of real market value. This Assessor's estimate relies on recent sales of comparable properties in the neighborhood and does not automatically reflect any changes to estimated residual land value. (In addition, all properties are inspected once every six years). This process is imperfect; in Seattle in 2017, the median appraised value for residential properties was \$528,000, while the median sales price was \$650,000.

Third, a homeowner's property tax bill does not scale proportionately with changes to assessed real market value. This is due to the complexities of Washington State's budget-based property tax system. In Washington, each jurisdiction's annual property tax levy cannot increase by more than 1 percent over the previous year's levy, unless the public votes for a greater increase. Taxes on new construction are exempt from the 1 percent limit. To illustrate this effect, consider the amount of taxes levied by the City of Seattle as part of its general rate (excluding voter-approved measures). Between 2010 and 2016, assessed value within the city increased by 33 percent, or 4.8 percent per year. Over the same period, the City's tax levy increased by 9 percent, or 1.5 percent per year. Holding all else constant (assuming no new construction or voter-approved levies), any assessed value increases over 1 percent per year will result in lowered property tax rates.

Recent increases to Seattle property tax bills are driven primarily by 1) statewide changes in how education is funded and 2) voter-approved measures, not by increased property values. In Seattle, nearly 50 percent of the property tax bill is due to voter-approved measures.

Finally, Washington State provides property tax exemption or deferral programs for people who are seniors, disabled, low-income, or widows/widowers of veterans. These programs are intended to minimize displacement due to property tax increases.

### **Bellan, Susan**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding individual neighborhood review.

### **Benjamin, Harriet**

- 1 Please contact the Seattle Department of Construction and Inspections for questions related to sewer scope requirements.

### **Bennett, Jan**

- 1 Thank you for your comment. The comment is noted.

### **Bernard, Barbara**

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

### **Bhakti, Sara**

- 1 Thank you for your comment. The comment is noted.

### **Bloomquist, Al**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

### **Boris-Brown, Kathryn**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

### **Borrow, James**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.
- 4 Thank you for your comment. The comment is noted.
- 5 Thank you for your comment. The comment is noted.

### Boyd, Marilyn

- 1 Storage space entirely outside ADU would not be included when calculating the size of an ADU. For example, if you have an existing garage where you have storage space on the main level and build a ADU as a second story above the garage and storage, that storage area would not be included in the size calculation for the ADU. This allows people to maintain existing parking and storage areas and add an ADU.

### Boyd, Marilyn

- 1 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative, including increasing the size of a DADU to 1,000 square feet.
- 2 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative, including removing the off-street parking requirement for ADUs.
- 3 Please see Chapter 3, History and Planning Context, for a discussion of additional programmatic strategies the City could pursue in addition to and independent of the Land Use Code changes evaluated in this EIS.
- 4 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative does not include an affordability incentive or requirement.
- 5 The ADU EIS pertains to proposed changes to the Land Use Code related to ADUs. Changing zoning designations or allowing for multifamily housing (i.e. duplexes, triplexes, and fourplexes) is outside the scope of this EIS.
- 6 Please see the frequent comment response concerning housing affordability.

### Boyd, Robyn

- 1 Thank you for your comment. The comment is noted.

### Bradshaw, Liam

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

### Brauner, Kal

- 1 Please see the frequent comment response regarding individual neighborhood review.
- 2 Please see the frequent comment response regarding individual neighborhood review.
- 3 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative, which would eliminate the owner-occupancy requirement and Section 4.1, Housing and Socioeconomics, for analysis of removal of the owner-occupancy requirement.

- 4 Please see the frequent comment response regarding parking. Please also see Chapter 3, History and Planning Context, for information added about the City's existing regulations regarding short-term rentals.
- 5 Thank you for your comment. The comment is noted.
- 6 Please see the frequent comment response regarding individual neighborhood review.

### **Brod, Brooke**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response concerning housing affordability.
- 3 Please see Section 3.3 for a discussion of ADUs permitted between 1994 and 2017. Data on ADUs built without a permit is not available.
- 4 Please see the frequent comment responses related to insufficient housing options and the positive impacts of the proposal.

### **Cali, Suzanne**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

### **Campbell, Julie**

- 1 As outlined in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would result in the creation of more ADUs under all action alternatives compared to Alternative 1 (No Action). While construction cost certainly impedes construction of additional ADUs, the analysis in the EIS shows that existing regulations also act as a barrier.
- 2 Please see Section 4.1. Additional discussion of the owner-occupancy requirement has been added to Section 4.1, Housing and Socioeconomics, and Appendix A of this Final EIS.
- 3 Thank you for your comment. The comment is noted.
- 4 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. As noted, floor area in an ADU would be exempt to encourage production of ADUs.
- 5 Thank you for your comment. The comment is noted.

### **Campbell, Julie**

- 1 Please see Section 3.2, Planning Context, for added discussion about short-term rentals. See Section 4.1, Housing and Socioeconomics, and Appendix A for discussion of how short-term rentals were considered in the analysis.

### Carlson, Amy

- 1 Please see the frequent comment response regarding individual neighborhood review.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative and the owner-occupancy requirement. See Section 4.1, Housing and Socioeconomics, for analysis of removal of the owner-occupancy requirement.
- 3 Please see the frequent comment response regarding parking. Please also see Chapter 3, History and Planning Context, for information added about the City's existing regulations regarding short-term rentals.
- 4 Thank you for your comment. The comment is noted.
- 5 Please see the frequent comment response regarding individual neighborhood review.

### Chase, Ronald

- 1 Please see the frequent comment response regarding individual neighborhood review.
- 2 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 3 The same design requirements for neighborhood character in the 2035 Comprehensive Plan would apply to the construction of new ADUs.
- 4 Please see Chapter 2, Alternatives, for a description of lot coverage requirements. As established in Seattle Municipal Code 23.44.010, the maximum lot coverage varies by lot size. For lots under 5,000 square feet, the maximum lot coverage allowed for principal and accessory structures is 1,000 square feet plus 15 percent of lot area. The maximum lot coverage for a lot of any size is not proposed to be changed; adding a DADU to a 3,200-square-foot lot would require that the main house and any other structures on the lot have not already exceeded the maximum lot coverage allowed.
- 5 Please see the frequent comment response concerning impacts to parking.
- 6 Attached ADUs are allowed on any single-family lot, regardless of lot size. The percent of lots that have an ADU includes both attached and detached accessory units.
- 7 As outlined in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would result in the creation of more ADUs under all action alternatives compared to Alternative 1 (No Action). While construction cost certainly impedes construction of additional ADUs, the analysis in the EIS shows that existing regulations also act as a barrier.
- 8 Additional discussion of short term rentals has been added to Chapter 3, History and Planning Context, and Section 4.1, Housing and Socioeconomics, of this Final EIS.
- 9 Thank you for your comment. The comment is noted.
- 10 Thank you for your comment. The comment is noted.

### Cherry Hill Community Council (DiLeva, Mary Pat)

- 1 Thank you for your comment. The comment is noted.

### Christensen, Thor

- 1 Please see Chapter 3, History and Planning Context, for a discussion of additional programmatic strategies the City could pursue in addition to, and independent of, the Land Use Code changes evaluated in this EIS.

### Clabots, Barbara

- 1 Thank you for your comment. The comment is noted.

### Clark, Karen

- 1 Please see the frequent comment response regarding individual neighborhood review.
- 2 The reestablishment of community councils is not being considered as part of the proposed Land Use Code changes and is outside the scope of the EIS.
- 3 The proposal evaluated in EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Determining what specific parcels will include an affordable housing project is outside the scope of this EIS.
- 4 Additional discussion of short term rentals has been added to Chapter 3, History and Planning Context, and Section 4.1, Housing and Socioeconomics, of this Final EIS.
- 5 MHA requirements are considered in the 2017 [MHA EIS](#) and are outside the scope of this EIS.
- 6 Thank you for your comment. The comment is noted.

### Cook, Jeffrey

- 1 Thank you for your comment. The comment is noted.

### Cooper, Valerie

- 1 Thank you for your comment. The comment is noted.

### Coulter, Sara

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

### Culver, Aleksandra

- 1 Thank you for your comment. The comment is noted.

- 2 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative, including removing the off-street parking requirement.
- 3 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 4 Please see Chapter 2, Alternatives. The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 5 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative that includes allowing two ADUs (either two attached or one attached and one detached).
- 6 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes increases in height and rear yard coverage for a single-story ADU provided construction does not result in tree removal.
- 7 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 8 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 9 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes exempting floor area in an ADU from the maximum FAR calculations to incentivize ADUs and allows for some additional height for DADUs that incorporate green building features.
- 10 Please see Chapter 2, Alternatives. The Preferred Alternative does not include an affordability requirement.

### **DeForest, Stephen**

- 1 Please see the frequent comment response regarding individual neighborhood review.

### **Denison, Sharon**

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

### **Eyler, Alicia**

- 1 Thank you for your comment. The comment is noted.

### **Eytinge, Jonathan**

- 1 The objective of the EIS is remove regulatory barriers to ADUs to make it easier to build an ADU and to increase the number and variety of housing choices in single-family zones.
- 2 Please see the frequent comment response regarding individual neighborhood review.

- 3 Thank you for your comment. The comment is noted.
- 4 Thank you for your comment. The comment is noted.
- 5 Thank you for your comment. The comment is noted.
- 6 Please see the frequent comment response regarding individual neighborhood review and parking impacts.

## Fauntleroy CC

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment responses regarding individual neighborhood review and housing affordability.
- 3 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 4 Staff from Seattle Public Utilities have been involved in the review of the EIS. Please see the frequent comment response concerning impacts to the water, drainage and sewer systems.
- 5 The EIS analyzes how each alternative could affect the maximum residual land value of each combination of parcel type and neighborhood. (Residual land value is the developer's land budget for a particular project. Increases to residual land value indicate the potential for increases in property values.) Please see Section 4.1, Housing and Socioeconomics, for discussion of potential changes to property values do the proposed alternatives. We have added additional analysis and discussion of potential property tax implications as part of this Final EIS.
- 6 As shown in Section 4.1, Housing and Socioeconomics, in higher- and medium-price neighborhoods, the amount a developer could afford to pay for land increases for parcel types C and D, suggesting that property values could increase for those properties. Smaller parcel types (A and B) in higher- and medium-price neighborhoods show minimal changes across the four alternatives. In lower-price neighborhoods, the amount a developer could afford to pay shows only small changes across the four alternatives, suggesting minimal change in property values. As discussed in Section 4.1, risk of displacement is generally higher in lower-price neighborhoods, so those at greatest risk of displacement will generally be less effected by any changes in property values. However, changes to residual land value do not directly impact property tax bills, for several reasons.

First, we use residual land value to better understand the underlying economics of the ADU provisions contemplated in the EIS. Changes in property valuations (used for tax assessments) will only show up to the extent that the potential for ADU creation results in increased sales prices, which is determined by ADU production rates and individual homebuyer and investor decisionmaking. It is not possible to use the residual land value analysis to directly forecast changes in property tax assessments. Second, actual property tax payments are are function of how properties are valued by the assessor

and in conjunction with rules for levying property taxes in the State of Washington. The King County Assessor assesses residential properties each year based on a complex statistical estimate of real market value. This Assessor's estimate relies on recent sales of comparable properties in the neighborhood and does not automatically reflect any changes to estimated residual land value. (In addition, all properties are inspected once every six years). This process is imperfect; in Seattle in 2017, the median appraised value for residential properties was \$528,000, while the median sales price was \$650,000.

Third, a homeowner's property tax bill does not scale proportionately with changes to assessed real market value. This is due to the complexities of Washington State's budget-based property tax system. In Washington, each jurisdiction's annual property tax levy cannot increase by more than 1 percent over the previous year's levy, unless the public votes for a greater increase. Taxes on new construction are exempt from the 1 percent limit. To illustrate this effect, consider the amount of taxes levied by the City of Seattle as part of its general rate (excluding voter-approved measures). Between 2010 and 2016, assessed value within the city increased by 33 percent, or 4.8 percent per year. Over the same period, the City's tax levy increased by 9 percent, or 1.5 percent per year. Holding all else constant (assuming no new construction or voter-approved levies), any assessed value increases over 1 percent per year will result in lowered property tax rates.

Recent increases to Seattle property tax bills are driven primarily by 1) statewide changes in how education is funded and 2) voter-approved measures, not by increased property values. In Seattle, nearly 50 percent of the property tax bill is due to voter-approved measures.

Finally, Washington State provides property tax exemption or deferral programs for people who are seniors, disabled, low-income, or widows/widowers of veterans. These programs are intended to minimize displacement due to property tax increases. The proposal does not require a homeowner to charge below market rent for ADUs.

- 7 Please see the frequent comment response concerning impacts to parking.
- 8 Please see the frequent comment response concerning impacts to parking.
- 9 Thank you for your comment. The comment is noted.

### Feather, Aunt

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.
- 4 We discuss impacts on housing supply and affordability in Section 4.1, Housing and Socioeconomics. This section includes estimates of ADU production and single-family teardowns likely to occur under each alternative (see Appendix A for a full methodology). In general, this EIS considers an increase in housing supply to have the effect of reducing upward pressure on rents that results from competition for scarce housing, thereby marginally reducing economic displacement pressure through more housing choices.

The EIS also considers the number of single-family teardowns in each alternative and understands that fewer demolitions suggests lower potential for physical displacement.

### **Fernandez, Bryan**

- 1 Thank you for your comment. The comment is noted.

### **Fiedler, Charles**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.

### **Fies, Michael**

- 1 Thank you for your comment. The comment is noted.

### **Fitz-Hugh, Lynn**

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

### **Foltz, Mark**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives. The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 3 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 4 The Preferred Alternative includes allowing some additional height for DADUs and additional rear lot coverage for a single-story DADU provided construction does not result in tree removal.
- 5 The Preferred Alternative would increase the maximum household size to up to 12 unrelated people if a lot has two ADUs.
- 6 Thank you for your comment. The comment is noted.

### **Fox, Rebecca**

- 1 Additional discussion of short term rentals has been added to Chapter 3, History and Planning Context, and Section 4.1, Housing and Socioeconomics, of this Final EIS.
- 2 Thank you for your comment. The comment is noted.

### Freeman, Robin

- 1 Thank you for your comment. The comment is noted.

### Frisch, Janet

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding individual neighborhood review.
- 3 Thank you for your comment. Despite the perceived contradiction, the statement that ADUs "would likely continue to be distributed throughout the city" and the statement that "ADU production rates would likely vary by neighborhood profile" are both accurate. As described in Section 4.1, Housing and Socioeconomics, our analysis indicates that ADU production will occur on all four parcel types and in all neighborhood profiles. This is consistent with existing trends for ADU production. As shown in Exhibit 4.1-1, Seattle's existing ADUs are distributed across all single-family neighborhoods in the city.
- 4 However, the production of ADUs is not uniformly distributed across the city. As seen in Exhibit A-20, our analysis indicates that both observable parcel-level characteristics and neighborhood fixed effects are predictors of ADU production. This can be seen in the estimates of future ADU production. For example, in Alternative 4 we estimate that 4.4 percent of parcels in higher-price neighborhoods will add ADUs over the 10-year period, compared with 3.5 percent of parcels in medium-price neighborhoods and 2.8 percent of parcels in lower-price neighborhoods. Although there are differences in ADU production between neighborhoods, the highest ADU production rate is still quite low in absolute terms, with less than 0.5 percent of parcels adding an ADU each year.
- 5 The review of other cities' policies is not required under SEPA. Portland, OR, and Vancouver, B.C., are used as an instructive comparison with Seattle in Chapter 3, History and Planning Context, because those cities have adopted similar regulations to what is considered in this EIS. The EIS incorporates empirical parking data from Portland, OR, in order to inform assumptions about parking utilization and vehicle ownership in our analysis.
- 6 As outlined in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would result in the creation of more ADUs under Alternative 2, Alternative 3 and the Preferred Alternative compared to Alternative 1 (No Action). While construction cost certainly impedes construction of additional ADUs, the analysis in the EIS shows that existing regulations also act as a barrier.
- 7 Thank you for your comment. The comment is noted.
- 8 Please see Section 4.3, Aesthetics for revised graphics showing more cars and additional discussion in Appendix C.

### Fuller, G

- 1 Thank you for your comment. The comment is noted.

### **Futurewise**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes removing the off-street parking requirement for ADUs.
- 3 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 4 The Preferred Alternative allows for additional height for DADUs that incorporate green building features.
- 5 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 6 Please also see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 7 The Preferred Alternative would increase the maximum household size to up to 12 unrelated people if a lot has two ADUs.
- 8 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

### **Goodwin, Jennifer**

- 1 Thank you for your comment. The comment is noted.

### **Gordon, Joan**

- 1 Thank you for your comment. The comment is noted.

### **Gordon, Richard**

- 1 Please see the frequent comment response on housing affordability.

### **Greigs, The**

- 1 Thank you for your comment. The comment is noted.

### **Haggberg, Marie**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see additional discussion of parking and transit access in Section 4.4, Parking and Transportation.
- 3 Thank you for your comment. The comment is noted.
- 4 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section

3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.

- 5 Thank you for your comment. The comment is noted.

### **Harris, Marlow**

- 1 Thank you for your comment. The comment is noted.
- 2 The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding apodments are not considered as part of the proposed Land Use Code changes and are outside the scope of the EIS.

### **Harrison, Rob — 1**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding suggestions for greater flexibility than contemplated in Alternative 2 or 3.
- 3 Thank you for your comment. The comment is noted.
- 4 Please see the frequent comment response regarding suggestions for greater flexibility than contemplated in Alternative 2 or 3.
- 5 Thank you for your comment. The comment is noted.
- 6 Please see the frequent comment response regarding suggestions for greater flexibility than contemplated in Alternative 2 or 3.
- 7 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes allowing additional height for DADUs that incorporate green building features.
- 8 Yard requirements in single-family zones help maintain a consistent building pattern, allow for maintenance of the side of buildings, and provide a visual break between building footprints in the lowest-density residential zone. Changes to measurement techniques for required yards is not included in this EIS.
- 9 Thank you for your comment. The comment is noted.
- 10 Thank you for your comment. The comment is noted.
- 11 Please see Chapter 2, Alternatives. Alternatives 2 and 3 and the Preferred Alternative would allow greater flexibility to locate the entrance to a DADU.
- 12 Please see the frequent comment response regarding suggestions for greater flexibility than contemplated in Alternative 2 or 3.
- 13 Thank you for your comment. The comment is noted.
- 14 Thank you for your comment. The comment is noted.
- 15 Please see Chapter 2, Alternatives. The Preferred Alternative exempts floor area within any ADU (attached or detached) from the FAR limits.

### Harrison, Rob — 2

- 1 Yard requirements in single-family zones help maintain a consistent building pattern, allow for maintenance of the side of buildings, and provide a visual break between building footprints in the lowest-density residential zone. Changes to regulations regarding measurement of required yards is outside the scope of this EIS.

### Hatlen, Kari

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 3 Thank you for your comment. The comment is noted.

### Herrin, Joe

- 1 Please refer to Section 4.1, Housing and Socioeconomics, for a discussion of the owner-occupancy requirement. Units could potentially be sold as condo units, but the land could not be subdivided.

### Hirami, Eileen and Gosciwski, Victor

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response concerning individual neighborhood review.
- 3 The city is not building rental units as part of the proposed Land Use Code changes. This suggestion is outside the scope of the analysis.

### Hoffman, Sara

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative that includes allowing two ADUs (either two attached or one attached and one detached). Please also see the frequent comment response regarding requests for greater flexibility than contemplated in Alternative 2 or 3.
- 3 The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 4 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 5 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. This includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.

- 6 Please see the frequent comment response regarding requests for greater flexibility than contemplated in Alternative 2 or 3.
- 7 The Preferred Alternative includes allowing for additional rear yard coverage for a single-story DADU provided construction does not result in tree removal.
- 8 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes allowing additional height for DADUs that incorporate green building features.
- 9 The Preferred Alternative would increase the maximum household size to up to 12 unrelated people if a lot has two ADUs.
- 10 The Preferred Alternative does not include an affordability requirement.
- 11 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 12 Please see Section 4.1, Housing and Socioeconomics, for a discussion related to the FAR limit and the associated impacts on teardowns related to displacement.

#### **Holverstott, Brett**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding suggestions for greater flexibility than contemplated in Alternative 2 or 3.

#### **Hurley, D Brad**

- 1 Thank you for your comment. The comment is noted.

#### **Ingham, Susan**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

#### **Jagiello, Tom**

- 1 Thank you for your comment. The comment is noted.

#### **Johnson, Kathy**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section

3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.

### **Johnston, Emily**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 3 Thank you for your comment. The comment is noted.

### **K., Rick**

- 1 As described in Section 4.1, Housing and Socioeconomics, our analysis indicates that ADU production will occur on all four parcel types and in all neighborhood profiles. This is consistent with existing trends on ADU production. As shown in Exhibit 4.1-1, Seattle's existing ADUs are distributed across all single-family neighborhoods in the city. While the analysis does assume that trend will continue, if a concentration of ADUs arises on a particular block, some localized impacts could occur.

### **Kallin, Chris**

- 1 Thank you for your comment. The comment is noted.

### **Karakowski, Jonathan**

- 1 Please see the frequent comment response regarding individual neighborhood review.
- 2 Please see Section 4.1, Housing and Socioeconomics, and Appendix A for a discussion of how the individual changes included in each alternative are considered as individual inputs into the analysis of ADU production. Under SEPA rules, the lead agency shall discuss impacts and alternatives at a level of detail appropriate to the scope of the nonproject proposal and to the level of planning for the proposal. Alternatives should be emphasized. In this EIS, the impacts are generally considered based on the combination of changes contemplated under each alternative.
- 3 Please see the frequent comment response concerning parking impacts. Please also see Appendix B for a discussion of the study locations that describes that data was repurposed from separate parking studies for two of the study locations and new data was collected for two study areas and for
- 4 Please see the Parking Analysis Area section in Section 4.4, Parking and Transportation, which describes how some of analysis relies on data previously collected, while new data was collected for two of the study areas (northeast and northwest) and

generally followed TIP 117. Please also note that TIP 117 provides guidance but does not require that data is collected on a Tuesday, Wednesday, or Thursday.

- 5 Exhibit 4.4-10 is correct. Route 2 is considered a 15-minute route. It has 56 outbound trips and 57 inbound trips between 6:00 a.m. and 7:00 p.m. (minimum is 52), and no individual hour has fewer than four trips (minimum is three). Route 29 is not symbolized as a 15-minute route; rather its entire extent is almost entirely covered by other more frequent routes: Route 2 through Queen Anne, Routes 3/4 on 3rd Ave W, Routes 31/32 on Nickerson St, D Line and 40 on the Ballard Bridge, Route 40 on Leary Way, and Route 44 on Market St. These all provide either 10- or 15-minute service along the same corridors. The one exception is W McGraw St between 6th Ave and 3rd Ave, where a segment of Route 29 is symbolized as "any frequency."
- 6 Routes 2 and 29 are correctly symbolized in Exhibit 4.4-10.
- 7 Thank you for the suggestion regarding the symbols we used for bus stops. We have updated those in Exhibit 4.4-12. As noted in previous responses, no changes are necessary for Exhibit 4.4-10 because it correctly represents routes 2 and 29.
- 8 The Full Build-Out scenario was included only in the aesthetics analysis to illustrate a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it here to illustrate the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.
- 9 As noted in Section 4.4, Parking and Transportation, and Appendix B, the study locations are representative samples and are intended to be presented as such. However, Exhibits B-12 through B-15 have been updated to include street names.
- 10 As noted in Section 4.4, Parking and Transportation, and Appendix B, the study locations are representative samples and are intended to be presented as such.
- 11 Our assumption of two parking spaces available for each parcel type was chosen to ensure that the analysis of highest and best use in Section 4.1, Housing and Socioeconomics, was not constrained by lack of parking for ADUs. On the whole, this assumption may result in an overestimate of the feasibility of adding ADUs, which would translate into an overestimate of ADU production. (In reality, some parcels likely would be constrained from adding ADUs by lack of parking or the cost of adding an additional parking space. However, parking waivers are available in cases where adding a parking space is physically infeasible due to steep topography or the location of existing structures.) The parking analysis in Section 4.3, Aesthetics, used the parcel types to classify parcels in the study areas but did not assume that new ADUs would use off-street parking. On the contrary, the parking analysis assumed that all ADU vehicles would park on-street. This assumption likely results in an overestimate of parking effects, as some ADU residents would likely park off-street (where off-street parking is available).

### Katz, Andy

- 1 The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. This includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 3 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 4 The Preferred Alternative includes allowing two ADUs (either two attached or one attached and one detached). Please also see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 5 The Preferred Alternative includes allowing additional height for DADUs that incorporate green building features.
- 6 The Preferred Alternative includes allowing for additional rear yard coverage for a single-story DADU provided construction does not result in tree removal.
- 7 The Preferred Alternative would increase the maximum size of a DADU to 1,000 square feet.
- 8 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 9 Please see Section 4.1, Housing and Socioeconomics, for a discussion of the FAR limit and the associated impacts on teardowns related to displacement.
- 10 The Preferred Alternative does not include an affordability requirement.

### Keeley, Karen

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 4 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 5 Thank you for your comment. The comment is noted.
- 6 Please see Chapter 2, Alternatives. Changes to subdivision regulations are not considered as part of the proposed Land Use Code.
- 7 The stated objective of the proposal is to increase the production levels of ADUs. As described in the analysis in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would increased those production levels.
- 8 Thank you for your comment. The comment is noted.

### **Kettle, Robert**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

### **Kimelman, David**

- 1 Thank you for your comment. The comment is noted.

### **Kirschner, Bryan and Ferguson, Holly**

- 1 Thank you for your comment. The comment is noted.
- 2 The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 3 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. This includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet. Please also see the frequent comment response regarding requests for greater flexibility than contemplated in Alternative 2 or 3.
- 4 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 5 The Preferred Alternative includes allowing two ADUs (either two attached or one attached and one detached). Please also see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 6 The Preferred Alternative includes allowing additional height for DADUs that incorporate green building features.
- 7 The Preferred Alternative includes allowing for additional rear yard coverage for a single-story DADU provided construction does not result in tree removal.
- 8 The Preferred Alternative would increase the maximum size of a DADU to 1,000 square feet. Please also see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 9 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 10 Please see Section 4.1, Housing and Socioeconomics, for a discussion of the FAR limit and associated impacts on teardowns related to displacement.
- 11 The Preferred Alternative does not include an affordability requirement.
- 12 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 13 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.

- 14 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 15 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 16 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.

### **Krom, Georgi**

- 1 Thank you for your comment. The comment is noted.

### **Lai, Kevin and Jennifer**

- 1 Thank you for your comment. The comment is noted.
- 2 Additional discussion of the owner-occupancy requirement has been added to Section 4.2, Land Use, and Appendix A of this Final EIS.
- 3 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The owner occupancy requirement would not be removed in the Preferred Alternative. Under existing regulations or what is proposed in Alternative 3, if the owner sold the property the new owner would have to live on site if they want to rent out either the main house or an ADU.
- 4 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The owner occupancy requirement would not be maintained in the Preferred Alternative. Under existing regulations or what is proposed in Alternative 3, if the owner sold the property the new owner would have to live on site if they want to rent out either the main house or an ADU.
- 5 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The owner occupancy requirement would be removed in the Preferred Alternative

### **Lange, Larry**

- 1 The parking analysis presented in Section 4.4, Parking and Transportation, uses the conservative assumption that any cars associated with newly ADU constructed would parking on the street, regardless of the proposed Land Use Code change.
- 2 Please see Appendix B for a description of data sources. As noted, peak parking demand usually occurs overnight on a weeknight, therefore we collected data on both weeknights and weekend overnight parking supply and utilization to estimate residential parking usage.
- 3 Please see the frequent comment response concerning impacts to parking.
- 4 The same design requirements for neighborhood character in the 2035 Comprehensive Plan would apply to the construction of new ADUs.

- 5 Please see Section 4.4, Parking and Transportation, for a discussion of impacts on parking and transportation and Section 4.3, Aesthetics, for a discussion of impacts on height, bulk, and scale.

### LaPierre, Curtis

- 1 Areas in urban villages are outside the scope of the Land Use Code changes considered in this EIS. However, RSL zoning would not preclude creation of an ADU.
- 2 Thank you for your comment. The comment is noted.

### Latoszek, Mira

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding individual neighborhood review.
- 3 Thank you for your comment. The comment is noted.
- 4 Please see the frequent comment response regarding individual neighborhood review.

### Lau, Andy

- 1 Thank you for your comment. The comment is noted.

### Laurelhurst CC

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.
- 4 The analysis of the potential impacts to public services and utilities in the EIS for the Seattle 2035 Comprehensive Plan (Seattle 2015 and Seattle 2016) is incorporated by reference into this EIS. The Comprehensive Plan EIS and this EIS both consider the same question: How does projected growth in the city affect the ability of public services and utilities to provide adequate service? The Comprehensive Plan EIS thoroughly analyzed the potential impacts to public services and utilities from a projected growth of 70,000 households in the city through 2035, including approximately 8,400 households in areas outside designated urban villages. Since the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS, we considered the estimated increase in households from the proposed Land Use Code changes and evaluated the impacts in the context of the changes analyzed in the Comprehensive Plan EIS. As noted in Section 4.5, Public Services and Utilities, Seattle Public Schools plans for student populations changes in the facility planning and is actively planning for future growth.
- 5 Please see the frequent comment response concerning parking impacts.
- 6 Additional discussion of short term rentals has been added to Chapter 3, History and Planning Context, and Section 4.1, Housing and Socioeconomics, of this Final EIS.

- 7 As described in Section 4.3, Aesthetics, under any alternative, development of new buildings could contribute new sources of light and glare from additional night lighting, higher visibility of interior lighting through windows at night, and reflection from windows. Although these light sources would increase, none of these sources is expected to cause adverse aesthetic impacts because many of these types of lights already exist in the study area.
- 8 Thank you for your comment. The comment is noted.
- 9 Any separate storage space that is entirely outside of the accessory dwelling unit would not be counted towards the size of ADU. For example, if you have an existing garage where you have storage space on the main level and build a ADU as a second story above the garage and storage, that storage area would not be included in the size calculation for the ADU. Under existing regulations the storage and parking areas count towards the maximum ADU size. This change modifies how the size of the ADU is calculated.
- 10 Thank you for your comment. The comment is noted.
- 11 Thank you for your comment. The comment is noted.
- 12 Section 4.2, Land Use, of the EIS notes that impacts in areas with an increase in population density could include changes in privacy, which are likely to be minor.
- 13 Thank you for your comment. The comment is noted.
- 14 The EIS discusses impacts on housing supply and affordability in Section 4.1, Housing and Socioeconomics. This section includes estimates of ADU production and single-family teardowns like to occur under each alternative (see Appendix B for a full methodology). In general, the EIS considers an increase in housing supply to have the effect of reducing upward pressure on rents that results from competition for scarce housing, thereby marginally reducing economic displacement pressure through more housing choices. The EIS also considers the number of single-family teardowns in each alternative and understands that fewer demolitions suggests lower potential for physical displacement.
- 15 As noted, short-term rentals were considered in the housing and socioeconomic analysis. Additional discussion is added in Chapter 3, History and Planning Context, and Section 4.1, Housing and Socioeconomics, of this Final EIS.
- 16 Thank you for your comment. The comment is noted.

### Lazerwitz, Jay

- 1 The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. This includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 3 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.

- 4 The Preferred Alternative includes allowing two ADUs (either two attached or one attached and one detached). Please also see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 5 The Preferred Alternative includes allowing additional height for DADUs generally, additional height for DADUs that incorporate green building features and would increase the maximum size of a DADU to 1,000 square feet.
- 6 The Preferred Alternative includes allowing for additional rear yard coverage for a single-story DADU provided construction does not result in tree removal.
- 7 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 8 Please see Section 4.1, Housing and Socioeconomics, and a discussion related to the FAR limit and the associated impacts on teardowns related to displacement.
- 9 The Preferred Alternative does not include an affordability requirement.

#### **Leman, Chris**

- 1 Thank you for your comment. The comment is noted.

#### **LeVine, Sharon**

- 1 Please see the frequent comment response regarding individual neighborhood review.

#### **Loesche, Patricia**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

#### **Lowe, Marco**

- 1 Thank you for your comment. The comment is noted.

#### **Mackay, Mary Jane**

- 1 Thank you for your comment. The comment is noted.

#### **Magnolia Community Council**

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 2 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

- 3 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 4 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 5 Please see the frequent comment response concerning impacts on tree canopy. Please also see Section 4.2, Land Use for an updated discussion of tree canopy and new section on parks and open space.
- 6 Thank you for your comment. The comment is noted.
- 7 Thank you for your comment. The comment is noted.

### **McCain, Cheryll**

- 1 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative and the owner-occupancy requirement. See Section 4.1, Housing and Socioeconomics, for analysis of removal of the owner-occupancy requirement.
- 2 Thank you for your comment. The comment is noted.
- 3 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 4 The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to parking regulations applicable to all uses citywide are not considered as part of the proposed Land Use Code changes and are outside the scope of the EIS.
- 5 Thank you for your comment. The comment is noted.

### **McGuire, Hank**

- 1 Construction of new ADUs would continue to be subject to all requirements of the Seattle Fire Code, including fire department access requirements to units.
- 2 Seattle Municipal Code 23.84a.032.R.20.f provides the definition for rowhouse development. The definition of accessory dwelling unit is found in Seattle Municipal Code 23.84a.032.R.1.

### **McQuiston, Cheryl**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

### **Miles, Don**

- 1 As discussed in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would have a marginal benefit for housing affordability due to increasing the supply of housing in the city.

"The EIS discusses impacts on housing supply and affordability in Section 4.1. This section includes estimates of ADU production and single-family teardowns like to occur under each alternative (see Appendix B for a full methodology). In general, the EIS considers an increase in housing supply to have the effect of reducing upward pressure on rents that results from competition for scarce housing, thereby marginally reducing economic displacement pressure through more housing choices. The EIS also considers the number of single-family teardowns in each alternative and understands that fewer demolitions suggests lower potential for physical displacement.

- 2 In the EIS, the phrase "upward pressure" in general refers to the phenomenon wherein population growth leads to increased competition for a finite number of homes on the market, resulting in higher prices as sellers respond to increasing demand and purchasing power among higher-income households. Given the many complex and interdependent factors that contribute to and determine housing costs, it would be speculative to project a specific increase in housing costs for each alternative.

The estimated number of teardowns for each alternative is quantified in Exhibit 4.1-12. The phrase "marginally more teardowns" in general means slightly more teardowns. As shown in Exhibit 4.1-12, the estimated number of teardowns in Alternative 2, Alternative 3, and the Preferred Alternative is lower than Alternative 1 (No Action) due to policy changes contemplated in each alternative, including removal of parking and owner-occupancy requirements and/or addition of an FAR limit for development in single-family zones. These changes tend to reduce the relative feasibility of demolishing a house and building one large new house compared to development that includes ADUs.

The phrase "displacement pressure" refers to the likelihood of involuntary dislocation that households face. The EIS estimates potential direct displacement due to demolition of existing housing (see Exhibit 4.1-12). While not all demolished single-family homes result in the displacement of a low-income household, the production model used in Section 4.1, Housing and Socioeconomics, results in an estimate of lots in the study area where the existing single-family house would be torn down and rebuilt. Economic displacement is more difficult to estimate. The EIS considers that greater ADU production likely increases rental housing options in the study area, thereby moderating housing price increases and reducing economic displacement pressure. The EIS also considers that greater ADU production allows more households to benefit from rental revenue, though we recognize that, absent other actions, overall construction costs will tend to limit ADU development to homeowners with relatively higher income under all alternatives."

- 3 Please see Section 4.2, Land Use. This chapter has been updated to include a discussion of historic resources.
- 4 The Full Build-Out scenario was included only in the aesthetics analysis to illustrate a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it here to illustrate the maximum scale of development

allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.

- 5 The highest and best use analysis and ADU production estimates generally suggest that, similar to past trends, future ADU development will tend to be distributed across parcel types and market areas. See Section 4.1 for discussion of market areas that may see marginally different rates of ADU production.  
Each section of the EIS then considers potential impacts of population increases using a methodology appropriate for the area of the environment in question. While production estimates suggest ADU production is likely to remain distributed, the EIS acknowledges that localized impacts could occur if ADU production is particularly concentrated in an area, such as a single block. The EIS also considers anticipated population increases due to ADU production in the context of 20-year growth estimates evaluated in the Final EIS for the Seattle 2035 Comprehensive Plan
- 6 Please see Section 4.3, Aesthetics, for added graphics and text related to development on a sloping site.
- 7 The Full Build-Out scenario was included only in the aesthetics analysis to illustrate a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it here to illustrate the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.
- 8 Please see the frequent comment response concerning impacts to parking.
- 9 The highest and best use analysis and ADU production estimates generally suggest that, similar to past trends, future ADU development will tend to be distributed across parcel types and market areas. See Section 4.1, Housing and Socioeconomics for discussion of market areas that may see marginally different rates of ADU production.  
Each section of the EIS then considers potential impacts of population increases using a methodology appropriate for the area of the environment in question. While production estimates suggest ADU production is likely to remain distributed, the EIS acknowledges that localized impacts could occur if ADU production is particularly concentrated in an area, such as a single block. The EIS also considers anticipated population increases due to ADU production in the context of 20-year growth estimates evaluated in the Final EIS for the Seattle 2035 Comprehensive Plan
- 10 Please see Section 4.3, Aesthetics, for added graphics and text related to development on a sloping site.

### **Nicol-Blades, Berta**

- 1 Thank you for your comment. The comment is noted.

### Nicolosi, Michelle

- 1 Thank you for your comment. The comment is noted.

### Okamoto, Margaret

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 The analysis of the potential impacts to public services and utilities in the EIS for the Seattle 2035 Comprehensive Plan (Seattle 2015 and Seattle 2016) is incorporated by reference into this EIS. The Comprehensive Plan EIS and this EIS both consider the same question: How does projected growth in the city affect the ability of public services and utilities to provide adequate service? The Comprehensive Plan EIS thoroughly analyzed the potential impacts to public services and utilities from a projected growth of 70,000 households in the city through 2035, including approximately 8,400 households in areas outside designated urban villages. Since the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS, we considered the estimated increase in households from the proposed Land Use Code changes and evaluated the impacts in the context of the changes analyzed in the Comprehensive Plan EIS.
- 4 Staff from Seattle Public Utilities have been involved in the review of the EIS. Please see the frequent comment response concerning impacts to the water, drainage and sewer systems.
- 5 Thank you for your comment. The comment is noted.
- 6 The analysis of the potential impacts to public services and utilities in the EIS for the Seattle 2035 Comprehensive Plan (Seattle 2015 and Seattle 2016) is incorporated by reference into this EIS. The Comprehensive Plan EIS and this EIS both consider the same question: How does projected growth in the city affect the ability of public services and utilities to provide adequate service? The Comprehensive Plan EIS thoroughly analyzed the potential impacts to public services and utilities from a projected growth of 70,000 households in the city through 2035, including approximately 8,400 households in areas outside designated urban villages. Since the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS, we considered the estimated increase in households from the proposed Land Use Code changes and evaluated the impacts in the context of the changes analyzed in the Comprehensive Plan EIS.  
  
As noted in Section 4.5 of the EIS, Seattle Public Schools plans for student populations changes in the facility planning and is actively planning for future growth.
- 7 The EIS discusses impacts on housing supply and affordability in Section 4.1, Housing and Socioeconomics. This section includes estimates of ADU production and single-family teardowns like to occur under each alternative (see Appendix A for a full methodology). In general, the EIS considers an increase in housing supply to have the effect of reducing

upward pressure on rents that results from competition for scarce housing, thereby marginally reducing economic displacement pressure through more housing choices. The EIS also considers the number of single-family teardowns in each alternative and understands that fewer demolitions suggests lower potential for physical displacement.

### Oliver, H. Pike

- 1 Thank you for your comment. The comment is noted.
- 2 The Preferred Alternative includes allowing two ADUs (either two attached or one attached and one detached). Please also see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 3 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. This includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 4 The Preferred Alternative includes allowing additional height for DADUs depending on lot width. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 5 The Preferred Alternative includes allowing additional height for DADUs that incorporate green building features.
- 6 The Preferred Alternative would increase the maximum size of a DADU to 1,000 square feet. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 7 The Preferred Alternative would increase the maximum household size to up to 12 unrelated people if a lot has two ADUs. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 8 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. DADUs can be located in front of the main house if it is outside of the required front yard. Please see Exhibit 2-6 that illustrates required yards in single-family zones.
- 9 The Preferred Alternative does include greater flexibility for placement of the DADU entrance. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 10 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 11 Please see response to comment #2 above.
- 12 Please see response to comment #3 above.
- 13 Please see response to comment #4 above.
- 14 Please see response to comment #3 above.
- 15 Please see response to comment #7 above.
- 16 Please see response to comment #8 above.

- 17 Please see response to comment #9 above.
- 18 Thank you for your comment. Please see Section 4.1, Housing and Socioeconomics, for discussion of the FAR limit and how that input affects the estimated number of teardowns.
- 19 Please see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 20 Thank you for your comment. The comment is noted.

### Osborne, George

- 1 The EIS analyzes how each alternative could affect the maximum residual land value of each combination of parcel type and neighborhood. (Residual land value is the developer's land budget for a particular project. Increases to residual land value indicate the potential for increases in property values.) Please see Section 4.1, Housing and Socioeconomics, for discussion of potential changes to property values do the proposed alternatives. We have added additional analysis and discussion of potential property tax implications as part of this Final EIS.

As described in Section 4.1, Housing and Socioeconomics, in higher- and medium-price neighborhoods, the amount a developer could afford to pay for land increases for parcel types C and D, suggesting that property values could increase for those properties. Smaller parcel types (A and B) in higher- and medium-price neighborhoods show minimal changes across the four alternatives. In lower-price neighborhoods, the amount a developer could afford to pay shows only small changes across the four alternatives, suggesting minimal change in property values. As discussed in Section 4.1, risk of displacement is generally higher in lower-price neighborhoods, so those at greatest risk of displacement will generally be less effected by any changes in property values.

However, changes to residual land value do not directly impact property tax bills, for several reasons.

First, we use residual land value to better understand the underlying economics of the ADU provisions contemplated in the EIS. Changes in property valuations (used for tax assessments) will only show up to the extent that the potential for ADU creation results in increased sales prices, which is determined by ADU production rates and individual homebuyer and investor decision-making. It is not possible to use the residual land value analysis to directly forecast changes in property tax assessments. Second, actual property tax payments are a function of how properties are valued by the assessor and in conjunction with rules for levying property taxes in the State of Washington. The King County Assessor assesses residential properties each year based on a complex statistical estimate of real market value. This Assessor's estimate relies on recent sales of comparable properties in the neighborhood and does not automatically reflect any changes to estimated residual land value. (In addition, all properties are inspected once every six years). This process is imperfect; in Seattle in 2017, the median appraised value for residential properties was \$528,000, while the median sales price was \$650,000.

Third, a homeowner's property tax bill does not scale proportionately with changes to assessed real market value. This is due to the complexities of Washington State's budget-based property tax system. In Washington, each jurisdiction's annual property tax levy cannot increase by more than one percent over the previous year's levy, unless the public votes for a greater increase. Taxes on new construction are exempt from the 1 percent limit. To illustrate this effect, consider the amount of taxes levied by the City of Seattle as part of its general rate (excluding voter-approved measures). Between 2010 and 2016, assessed value within the city increased by 33 percent, or 4.8 percent per year. Over the same period, the City's tax levy increased by 9 percent, or 1.5 percent per year. Holding all else constant (assuming no new construction or voter-approved levies), any assessed value increases over 1 percent per year will result in lowered property tax rates.

Recent increases to Seattle property tax bills are driven primarily by 1) statewide changes in how education is funded and 2) voter-approved measures, not by increased property values. In Seattle, nearly 50 percent of the property tax bill is due to voter-approved measures.

Finally, Washington State provides property tax exemption or deferral programs for people who are seniors, disabled, low-income, or widows/widowers of veterans. These programs are intended to minimize displacement due to property tax increases.

- 2 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

### **Pearson, Linda**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

### **Pedroso, Anna**

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

### **Pehl, Tom**

- 1 Thank you for your comment. The comment is noted.

### **Perkins, Sandra**

- 1 Thank you for your comment. The comment is noted.

### **Peterson, S Brook**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

- 3 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 4 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 5 Please see Section 3.2, Planning Context, for added discussion about short-term rentals and Section 4.1, Housing and Socioeconomics, for a discussion of how short-term rental income was included in the pro-forma analysis.
- 6 The Preferred Alternative includes allowing two ADUs (either two attached or one attached and one detached). Allowing for multifamily structures is outside the scope of this EIS; please see the frequent comment response concerning multifamily zoning.
- 7 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 8 The Preferred Alternative includes allowing additional height for DADUs that incorporate green building features. Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.

### Phinney Ridge CC

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding individual neighborhood review.
- 3 Please see the frequent comment response concerning impacts to parking.
- 4 The EIS analyzes how each alternative could affect the maximum residual land value of each combination of parcel type and neighborhood. (Residual land value is the developer's land budget for a particular project. Increases to residual land value indicate the potential for increases in property values.) Please see Section 4.1, Housing and Socioeconomics, and Exhibit A-44 for discussion of potential changes to property values do the proposed alternatives. We have added additional analysis and discussion of potential property tax implications as part of this Final EIS.

As shown in Exhibit A-44, in higher- and medium-price neighborhoods, the amount a developer could afford to pay for land increases for parcel types C and D, suggesting that property values could increase for those properties. Smaller parcel types (A and B) in higher- and medium-price neighborhoods show minimal changes across the four alternatives. In lower-price neighborhoods, the amount a developer could afford to pay shows only small changes across the four alternatives, suggesting minimal change in property values. As discussed in Section 4.1, risk of displacement is generally higher in lower-price neighborhoods, so those at greatest risk of displacement will generally be less effected by any changes in property values.

However, changes to residual land value do not directly impact property tax bills, for several reasons.

First, we use residual land value to better understand the underlying economics of the ADU provisions contemplated in the EIS. Changes in property valuations (used for tax assessments) will only show up to the extent that the potential for ADU creation results in increased sales prices, which is determined by ADU production rates and individual homebuyer and investor decision-making. It is not possible to use the residual land value analysis to directly forecast changes in property tax assessments. Second, actual property tax payments are a function of how properties are valued by the assessor and in conjunction with rules for levying property taxes in State of Washington. The King County Assessor assesses residential properties each year based on a complex statistical estimate of real market value. This Assessor's estimate relies on recent sales of comparable properties in the neighborhood and does not automatically reflect any changes to estimated residual land value. (In addition, all properties are inspected once every six years). This process is imperfect; in Seattle in 2017, the median appraised value for residential properties was \$528,000, while the median sales price was \$650,000.

Third, a homeowner's property tax bill does not scale proportionately with changes to assessed real market value. This is due to the complexities of Washington State's budget-based property tax system. In Washington, each jurisdiction's annual property tax levy cannot increase by more than one percent over the previous year's levy, unless the public votes for a greater increase. Taxes on new construction are exempt from the 1 percent limit. To illustrate this effect, consider the amount of taxes levied by the City of Seattle as part of its general rate (excluding voter-approved measures). Between 2010 and 2016, assessed value within the city increased by 33 percent, or 4.8 percent per year. Over the same period, the City's tax levy increased by 9 percent, or 1.5 percent per year. Holding all else constant (assuming no new construction or voter-approved levies), any assessed value increases over 1 percent per year will result in lowered property tax rates.

Recent increases to Seattle property tax bills are driven primarily by 1) statewide changes in how education is funded and 2) voter-approved measures, not by increased property values. In Seattle, nearly 50 percent of the property tax bill is due to voter-approved measures.

Finally, Washington State provides property tax exemption or deferral programs for people who are seniors, disabled, low-income, or widows/widowers of veterans. These programs are intended to minimize displacement due to property tax increases.

- 5 Thank you for your comment. The comment is noted.
- 6 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 7 Thank you for your comment. The comment is noted.
- 8 Please see the frequent comment response regarding individual neighborhood review.

## Pittenger, Glenn

- 1 Thank you for your comment. The comment is noted.

- 2 Please Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative would eliminate the off-street parking requirement for ADUs.
- 3 Per Seattle Municipal Code Section 23.40.020, variances may be sought from the provisions of Subtitle III, Divisions 2, 3, and 4 of this Title 23. This provision would allow an applicant to seek a variance.
- 4 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 5 Thank you for your comment. The comment is noted.
- 6 Capacity charges are levied by King County; the City does not have authority to waive those fees. King County has two studies underway that may lead to changes to the capacity charge, including charges for a new ADU (see <https://www.kingcounty.gov/services/environment/wastewater/capacity-charge/review-studies.aspx> for more information). Please also see the frequent comment response regarding King County Sewage Treatment Capacity Charges.

### **Pleusnin, George**

- 1 Thank you for your comment. The comment is noted.

### **Queen Anne Historical Society**

- 1 Please see the frequent comment response regarding individual neighborhood review.

### **Queen Anne Community Council**

- 1 The City does not disagree that existing Land Use Code regulations enable the construction of ADUs in single-family zones; however, the stated objective of the proposal is to increase those production levels. And, as described in Section 4.1, Housing and Socioeconomics, of the EIS, the results of the analysis indicate that changing the Land Use Code would result in an increase in the productions of ADUs. The impacts from the construction of additional ADUs are discussed in Chapter 4, Environmental Analysis .
- 2 The proposed action would amend, not overturn, the Land Use Code regulations related to ADUs. The Seattle Planning Commission has submitted comments in support of the proposed code changes.

While review of other cities' policies is not required under SEPA, the EIS incorporates empirical parking data from Portland, Oregon, to inform assumptions about parking utilization and vehicle ownership in our analysis. Please see Appendix B for a discussion of this methodology. In particular, see the equations beginning on page B-21 for examples of mathematical equations we used to adjust Portland data based on Seattle-specific metrics. Along with normalizing Portland data in this way, we conservatively rounded several assumptions upward so that the analysis considers impacts from relatively higher numbers of vehicles. For example, as described on page B-24, our ADU production estimates show that between 1.63 and 4.64 percent

of parcels would have an ADU depending on parcel characteristics, we estimated demand for on-street parking by conservatively applying the highest estimated ADU production rate at the nearest whole number for all eligible parcels.

Portland is an instructive comparison with Seattle. The December 2016 Hearing Examiner's Decision notes only that Portland allows one ADU of up to 800 square feet and the proposal evaluated in this EIS would allow two larger units. The EIS accounts for that distinction by modeling unit size and two-ADU outcomes in the highest and best use analysis and then incorporating those findings into the ADU production model.

- 3 The ADU EIS is a programmatic environmental impact statement. It uses an appropriate level of analysis to evaluate the effects of a broad proposal that may include numerous individual projects, implemented over a long timeframe, and/or across a large geographic area. SEPA does not require that the City prepare separate analyses or documents for each ADU constructed.

For programmatic proposals, including areawide zoning and land use changes like the proposed action, SEPA Rules require only that an EIS contain a general discussion of the impacts of alternative proposals for plans, land use designations, or implementation measures. SEPA does not require site-specific analyses for individual geographic areas (WAC 197-11-442[3] and [4]). Therefore, analyzing certain impacts of the proposed Land Use Code changes at a broader scale is appropriate.

To understand the effects of this broad proposal, the EIS contains substantial information and analysis about, and based on review of, generalized variations among individual neighborhoods, subareas, and parcels. The highest and best use analysis in Section 4.1, Housing and Socioeconomics, relies on pro formas that consider varying market conditions by neighborhood area (see Exhibit 4.1-10). We developed and used a parcel typology that accounts for variation in parcel characteristics across the study area (see Exhibit 4.1-11). We present the frequency of these parcel types in each single-family neighborhood, so findings that vary by parcel type can be understood in the context of actual neighborhood conditions (see Exhibit A-23).

The parking analysis also considers differing neighborhood-level conditions. We used empirical data on parking utilization and availability gathered through parking studies in four representative neighborhoods (see Exhibit B-1). The transportation section identifies unimproved sidewalks across the entire study area (see Exhibit 4.4-6). We present the existing transit network and illustrate areas of Seattle according to their proximity to frequent transit (see Exhibit 4.4-10, Exhibit 4.4-11, and Exhibit 4.4-12).

Chapter 3, Housing and Planning Context, discusses and presents several exhibits that illustrate the variation in cultural, economic, and social conditions across Seattle. In particular, Exhibit 3-12 shows population by race, and Exhibit 3-15 shows housing tenure across the city. Exhibit 4.1-16, Exhibit 4.1-18, and Exhibit 4.1-19 present further information about demographic and socioeconomic variation across neighborhoods in the study area.

Under SEPA Rules, the purpose of an EIS is to identify likely significant adverse environmental impacts. Used in this context, "significant" means a reasonable

likelihood of more than a moderate adverse impact on environmental quality. The EIS identifies many effects and outcomes that could result from the Land use Code changes contemplated under each alternative, such as potential increases in parking utilization, or localized impacts if a concentration of ADU development occurs in a parking block. However, the analysis in this EIS does not find that the proposal would result in significant adverse impacts on any element of the environment to be analyzed under SEPA.

**4** See the response to comment #3 above.

This statement, which appears on page 4-86 of the Final EIS, is provided specifically in the context of describing the existing conditions for the aesthetics analysis, which evaluates impacts to height, bulk, and scale. The paragraph goes on to state that the analysis considers common built form conditions since the proposed Land Use Code changes would affect infill development in already developed neighborhoods. Accordingly, a comprehensive summary of every aesthetic feature in the study area is not required under SEPA.

**5** The EIS relies on detailed analysis and study of the potential effects of the Land Use Code changes and ties the results of the study to support the conclusions in the EIS. The EIS quantitatively evaluates the number of new ADUs that would result from the proposed Land Use Code changes and evaluates how the anticipated changes to the rate of ADU production would impact elements of the environment, providing a basis of comparison among the alternatives considered in the EIS.

**6** This statement, which appears on page 4-86 of this Final EIS, is provided specifically in the context of describing the existing conditions for the aesthetics analysis. The paragraph goes on to state that the analysis considers common built form conditions since the proposed Land Code Use changes would affect infill development in already-developed neighborhoods.

As outlined in Section 4.4.1 of the Draft EIS, the parking analysis area provides a representative sample of neighborhoods where ADUs could be constructed. Four study locations were selected that represent a range of conditions found in single-family zones and include areas that vary by lot size; the presence of alleys, driveways, and sidewalks; and proximity to transit. We identified blocks with unrestricted parking, restricted parking, and no parking allowed. Many areas outside these study locations resemble the conditions found within the study locations. To the extent that there are areas distinctly different than the study locations, the EIS discloses that, in specific contexts or locations, localized impacts on parking availability could occur. Please see Exhibit B-3 through Exhibit B-14, which provide maps of each parking study location, illustrate the distribution of lot sizes in each study location, and compare this distribution to the EIS study area overall. In general, the parking study locations represent a range of conditions in terms of lot sizes, resembling conditions found in the entire EIS study area. To the extent that there are areas distinctly different than the study locations, the EIS discloses that, within a specific context or location, localized impacts on parking availability could occur.

- 7** Please see the previous response to comment #3 and the frequent comment response related to neighborhood-level analysis.
- 8** Please see the previous responses to comments #2, #3, and #6.

The parking analysis evaluated parking utilization overnight on weeknights and during the afternoon on weekends in the four study locations. These are typically when peak parking demand occurs. Effects of commuters entering Seattle and parking on City streets close to transit service were not specifically considered as this effect would not be realized during weekend or weeknight parking, nor would the practice of "park and hide" increase due to the changes contemplated in this EIS.
- 9** As described in Section 3 of Appendix B, no data exists for vehicle ownership rates for ADU residents in Seattle. Therefore, the average rate of vehicle ownership for ADU residents in Seattle was calculated using data from a survey of vehicle ownership for ADU owners in Portland, Oregon, and U.S. Census data for vehicle ownership for renters in Seattle. The analysis conservatively assumes that all ADU residents would utilize on-street parking, regardless of whether off-street parking is available or whether the alternative includes an off-street parking requirement.

We did not directly borrow the vehicle ownership rate for ADU residents observed in Portland. Instead, we calibrated our assumptions to Seattle's context by adjusting the ratio of ADU- and renter-household vehicle ownership in Portland by Seattle's renter-household vehicle ownership rate (see Equation 1 in Appendix B). We further refined our assumptions to Seattle by considering the average number of bedrooms per rental unit not just in Seattle compared to Portland overall, but within each parking study location. Finally, we conservatively adjusted our assumption about vehicle ownership among ADU renters upward compared to the overall renter population to reflect the fact that, in general, ADUs in single-family zones are relatively further from frequent transit than other rental housing.
- 10** Please see the frequent comment response related to neighborhood-level analysis and previous response to comment 6 related to parking.
- 11** The issues noted by the Hearing Examiner include expanding the assessment of housing and displacement impacts. Section 4.1, Housing and Socioeconomics, describes the potential impacts to both from the proposed Land Use Code changes.
- 12** As outlined in Section 1.2, Proposal Objective, the objectives of this proposal are to remove regulatory barriers to make it easier for property owners to permit and build ADUs and to increase the number and variety of housing choices in single-family zones.

As outlined in Section 4.1, housing affordability would remain a concern and burden for many Seattle residents under all alternatives evaluated including Alternative 1 (No Action). However, compared to Alternative 1 (No Action), Alternative 2, Alternative 3, and the Preferred Alternative would all have marginal benefits with respect to housing affordability; would decrease the potential for economic displacement by reducing

upward pressure on rents and housing prices; and reduce the potential for physical displacement by reducing the number of teardowns. As a result, no mitigation is required.

- 13** As outlined in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would result in the creation of 2,310 additional ADUs under Alternative 2, 1,430 additional ADUs under Alternative 3, and 2,460 additional ADUs under the Preferred Alternative compared to Alternative 1 (No Action). While construction cost certainly impedes construction of additional ADUs, the analysis in the EIS shows that existing regulations also act as a barrier.

The City is considering a range of strategies and tools outside of Land Use Code regulations that could help produce ADUs with lower rents and reserved for lower-income households and/or make it possible for homeowners with relatively lower incomes to create an ADU. See Section 3.2, Planning Context, for additional details. These possible strategies are not a specific proposal or action, and they are outside the scope of this EIS; we provide them for your information.

- 14** The EIS discusses how Seattle's short-term rental regulations affect properties with ADUs. See page 3-28 for information about this policy, which would apply under all alternatives considered in the EIS.

No data exists to confirm or deny the number of ADUs currently used as short-term rentals. However, the EIS does explicitly study the highest and best use of ADUs including as potential short-term rental housing. Specifically, the EIS considers short-term rentals in the pro forma analysis, whose results and methodology are presented in Section 4.1, Housing and Socioeconomics, and discussed in detail in Appendix A. Please see Exhibit A-28, Exhibit A-33, Exhibit A-38, and Exhibit A-43 for estimates of residual land values resulting from several ways of valuing ADUs, including as short-term rentals, in different market areas and on different lot types across Seattle's single-family zones

- 15** As described in Section 1.2, Proposal Objective, the objectives of the proposed Land Use Code changes are to remove regulatory barriers to make it easier for property owners to permit and build ADUs and to increase the number and variety of housing choices in single-family zones. Section 4.1, Housing and Socioeconomics, describes how the proposal could also have marginal benefits for housing affordability by increasing housing supply, increasing the number of smaller units available, and reducing the number of existing homes demolished compared to Alternative 1 (No Action). Please also see the frequent comment response related to housing affordability.

This EIS discusses impacts on housing affordability and displacement in Section 4.1. This section includes estimates of ADU production and single-family teardowns likely to occur under each alternative (see Appendix B for a full methodology). In general, the EIS considers an increase in housing supply to have the effect of reducing upward pressure on rents that results from competition for scarce housing, thereby marginally reducing economic displacement pressure through more housing choices. The EIS also considers the number of single-family teardowns in each alternative and understands that fewer demolitions suggests lower potential for physical displacement.

In this EIS, the phrase "upward pressure" in general refers to the phenomenon wherein population growth leads to increased competition for a finite number of homes on the market, resulting in higher prices as sellers respond to increasing demand and purchasing power among higher-income households. Given the many complex and interdependent factors that contribute to and determine housing costs, it would be speculative to project a specific increase in housing costs for each alternative.

The estimated number of teardowns for each alternative is quantified in Exhibit 4.1-15. In general, the phrase "marginally more teardowns" means slightly more teardowns. As shown in Exhibit 4.1-15, the estimated number of teardowns in Alternative 2, Alternative 3, and the Preferred Alternative is lower than Alternative 1 (No Action) due to policy changes contemplated in each alternative, including removal of off-street parking and owner-occupancy requirements and/or addition of an FAR limit for development in single-family zones. These changes tend to reduce the relative feasibility of demolishing a house and building one large new house compared to development that includes ADUs.

The phrase "displacement pressure" refers to the likelihood of involuntary dislocation that households face. The EIS estimates potential direct displacement due to demolition of existing housing (see Exhibit 4.1-15). While not all demolished single-family homes result in the displacement of a low-income household, the production model used in Section 4.1 results in an estimate of lots in the study area where the existing single-family house would be torn down and rebuilt. Economic displacement is more difficult to estimate. To evaluate displacement impacts, the EIS considers that greater ADU production likely increases rental housing options in the study area, thereby moderating housing price increases and reducing economic displacement pressure. The EIS also considers that greater ADU production allows more households to benefit from rental revenue, though we recognize that, absent other actions, overall construction costs will tend to limit ADU development to homeowners with relatively higher income under all alternatives.

**16** Please see previous response to comment 15 related to affordable housing.

Further, as outlined in Section 4.1, Housing and Socioeconomics, the pro forma analysis specifically considers the probability of various development outcomes on parcels of different sizes and in different parts of the city. The analysis considers the financial performance of 44 legally permissible development outcomes. For example, a property owner could tear down an existing structure and build a new house (with or without an ADU); or they could keep an existing house and do nothing, remodel, or add an ADU. The results of the pro forma analysis are presented in Exhibit 4.1-13. Compared to Alternative 1 (No Action), the results suggest that Alternative 2 and Alternative 3 would not increase the likelihood that a property owner would demolish existing housing.

Among the results presented in Exhibit 4.1-13 for 48 distinct scenarios — an evaluation of four parcel types, in three market areas, for each of four alternatives — in no case is tearing down an existing house to build a new house with one or two ADUs the most feasible development outcome. The analysis indicates that, in some cases, the highest and best use of property shifts from demolition of existing housing under Alternative

1 (No Action) to preserving existing housing and adding one or two ADUs, an outcome that reduces demolition and displacement and creates new housing options.

Exhibit A-28, Exhibit A-33, Exhibit A-38, and Exhibit A-43 present estimates of residual land value for different valuation options for each parcel type, in each market area, for each of the four alternatives. In no scenario is renting all units the most feasible outcome for a property owner under any alternative. Likewise, renting one ADU as a short-term rental (Seattle's short-term rental regulations would not allow two ADUs on the same lot to be used as short-term rentals) is not the most feasible development outcome on any parcel type, in any market area, across all alternatives. Further, these exhibits show that the Land Use Code changes contemplated in Alternative 2, Alternative 3, and the Preferred Alternative would increase the relative feasibility of preserving housing and adding ADUs (thereby reducing demolitions and physical displacement) compared to Alternative 1 (No Action).

- 17** The EIS assumes that reducing regulatory barriers would increase the number of ADUs produced. This approach allows us to identify potential environmental impacts resulting from ADU construction. The pro forma analysis considers the policy changes included in each alternative and informs the forecast model that estimates ADU production.

As outlined in Section 4.1, the proposed Land Use Code changes would result in the creation of 2,310 additional ADUs under Alternative 2, 1,430 additional ADUs under Alternative 3, and 2,460 additional ADUs under the Preferred Alternative compared to Alternative 1 (No Action). While costs are certainly an additional impediment to construction of additional ADUs, our analysis indicates that the current Land Use Code also serves as a barrier.

See Exhibit 3-21 for a chart of ADU production in Seattle from 1994 to 2017. Between 2010 and 2015, 307 DADUs were permitted, an average of slightly more than 51 per year. In 2016 and 2017, 247 DADUs were permitted, an average of about 124 in the last two years. Construction costs have increased in recent years and thus do not explain the increased rate of ADU production.

- 18** See Appendix A for a detailed description of the methodology for the highest and best use analysis. The analysis considers the presence or absence of an owner-occupancy requirement in each alternative; the potential for smaller lots to have DADUs if the minimum lot size is lower; and the financial consequences of allowing larger DADUs, like slightly greater construction cost and higher rents. While a "traditional property owner" might create an ADU for reasons unrelated to profit, like creating additional living space or to house family members, the pro forma analysis evaluates development outcomes from the perspective of a profit-maximizing owner or developer. We consider, for example, whether it is more profitable to value a house and its ADU(s) as square footage on the for-sale market, as long-term rental units, with a short-term rental unit, or a combination of these.
- 19** As described in Section 4.1, Housing and Socioeconomics, and Appendix A of the Draft EIS, the EIS analyzes how each alternative might change the highest and best

use in the study area. This approach allows us to explicitly analyze this question. The highest and best use analysis evaluates which development outcome(s) would maximize return on investment from the perspective of a profit-maximizing developer. The analysis compares the financial performance of 44 development outcomes under a range of valuation options, including scenarios in which a house with ADU(s) is treated as a multifamily rental property. In no scenario is renting all units the most feasible outcome for a property owner under any alternative. See Exhibit A-25 through Exhibit A-39 for detailed analysis results from the highest and best use analysis.

- 20** The EIS relies on detailed analysis and study of the potential effects of the Land Use Code changes and ties the results of the study to support the conclusions in the EIS. The EIS quantitatively evaluates how many new ADUs would be created by the proposed Land Use Code changes and evaluates how the proposed changes to the rate of ADU production would impact the elements of the environment, providing a basis of comparison among the alternatives considered in the EIS.
- 21** The highest and best use analysis and ADU production estimates generally suggest that, similar to past trends, future ADU development will tend to be distributed across parcel types and market areas. See Section 4.1, Housing and Socioeconomics, for discussion of market areas that may see marginally different rates of ADU production. Each section of the EIS then considers potential impacts of population increases using a methodology appropriate for the area of the environment in question. While production estimates suggest ADU production is likely to remain distributed, the EIS acknowledges that localized impacts could occur if ADU production is particularly concentrated in an area, such as a single block. The EIS also considers anticipated population increases due to ADU production in the context of 20-year growth estimates evaluated in the Final EIS for the Seattle 2035 Comprehensive Plan.
- 22** The Full Build-Out scenario was included only in the aesthetics analysis to illustrate a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. As noted in Section 4.3, we do not expect this scenario to occur, but we include it in the results section beginning on page 4-95 to illustrate the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.
- 23** Construction of new ADUs would continue to be subject to all requirements of the Seattle Fire Code, including fire department access requirements to units.
- 24** The Full Build-Out scenario was included in the aesthetics analysis to show a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it to illustrate the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.

- 25** SEPA requires disclosure of likely significant impacts. No significant impact was identified here either because the impacts are minimal overall or because the impacts have been mitigated.

The Full Build-Out scenario was included in the aesthetics analysis to show a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it to illustrate and compare the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.

- 26** Please see updated illustrations in Section 4.3, Aesthetics. For analysis related to the effects of the proposal on parking availability, please refer to Section 4.4, Parking and Transportation. The aesthetics analysis is not intended to evaluate parking availability or impacts on parking. We show vehicles for illustrative purposes only.

See Section 4.3, Aesthetics, for a discussion of impacts of each alternative. Section 4.3 follows the illustrations of development scenarios under each alternative and analyzes whether and how each policy change is likely to result in changes to height, bulk, and scale. In particular, Exhibit 4.3-13, Exhibit 4.3-22, Exhibit 4.3-31, and Exhibit 4.3-40 show potential changes to views from rear yards in each alternative. The proposal does include a change to the maximum rear yard coverage limit only for DADUs with a total height of 15 feet or less. The policy is intended to make it easier for owners to create one-story DADUs appropriate for people with limited mobility, people with disabilities, and aging in place. The proposal to increase the rear yard coverage limit would not adversely affect privacy. In fact, the current rear yard coverage sometimes limits an owner's ability to create a usable living space on one story, thereby incentivizing construction of a taller and more visually impactful two-story DADU, which has greater impacts on privacy than a one-story DADU. See Section 4.3, Aesthetics, for a visual illustration of this proposed change to the rear yard coverage limit.

Please see Section 4.2, Land Use, for a discussion of impacts of each alternative on tree canopy. In particular, please see Exhibit 4.2-8 and Exhibit 4.2-9, both added in the Final EIS. Please also see Exhibit 2-2 (new in the Final EIS) and the discussion of rear yard coverage on page 2-13, which together explain that the Preferred Alternative would allow rear yard coverage above the current limit of 40 percent only if the DADU does not result in the removal of trees.

- 27** A 3,200-square-foot lot does not enjoy an exception from maximum lot coverage limits. As established in Seattle Municipal Code 23.44.010, the maximum lot coverage allowed for principal and accessory structures depends on lot size. For lots 5,000 square feet and larger, the maximum coverage allowed is 35 percent of lot area. For lots under 5,000 square feet, the maximum coverage is 1,000 square feet plus 15 percent of lot area. These calculations apply whether or not the lot has an ADU. Further, this standard applies equally across all alternatives, including Alternative 1 (No Action); no change to the maximum lot coverage limit is proposed.

Under all alternatives, the lot coverage limit applies to principal and accessory structures combined. For all lots, regardless of size, the same area can be covered by a single-family house as can be covered by a single-family house and an ADU.

The proposal does include a change to the maximum rear yard coverage limit only for DADUs with a total height of 15 feet or less. The policy is intended to make it easier for owners to create one-story DADUs appropriate for people with limited mobility, people with disabilities, and aging in place. The proposal to increase the rear yard coverage limit would not adversely affect privacy. In fact, the current rear yard coverage sometimes limits an owner's ability to create a usable living space on one story, thereby incentivizing construction of a taller and more visually impactful two-story DADU, which has greater impacts on privacy than a one-story DADU. See Section 4.3, Aesthetics, for a visual illustration of this proposed change to the rear yard coverage limit.

Please also see Exhibit 2-2 and the discussion of rear yard coverage on page 2-13, which together explain that the Preferred Alternative would allow rear yard coverage above the current limit of 40 percent only if the DADU does not result in the removal of trees.

- 28** As outlined in Section 4.5, Public Services and Utilities, the analysis of the potential impacts to public service and utilities in the EIS for the Seattle 2035 Comprehensive Plan was incorporated by reference into the EIS. The Comprehensive Plan EIS and this EIS both consider the same question: How does projected growth in the city affect the ability of public services and utilities to provide adequate service? The Comprehensive Plan EIS thoroughly analyzed the potential impacts to public services and utilities from a projected growth of 70,000 households in the city through 2035, including approximately 8,400 households in areas outside designated urban villages. Since the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS, we considered the estimated increase in households from the proposed Land Use Code changes and evaluated the impacts in the context of the changes analyzed in the Comprehensive Plan EIS.

In addition, Seattle Public Utilities provided input during the scoping period and DEIS public comment period. SPU recommended that when homeowners convert areas below grade to ADUs (or to any other habitable space), they should demonstrate compliance with the requirements of Seattle Plumbing Code section 710 which requires backflow prevention on fixtures installed on a floor level that is lower (in elevation) than the next upstream manhole cover of the public sewer. SPU noted that the increase in sewer demand resulting from ADU construction will not substantially impact sewer capacity. However, they further noted, as outlined in the EIS, that there could be localized impacts if ADU production is higher in a concentrated area, such as a particular block in the study area.

- 29** The results of the ADU production model in Section 4.1, Housing and Socioeconomics, suggest that, through ADU development, the Preferred Alternative could result in approximately 4,430 additional households over 10 years compared to Alternative 1 (No Action). The results show that these additional ADUs are likely to be distributed across all market sub-areas and all parcel types evaluated in the analysis. Because changes in

the relative feasibility of constructing ADUs between Alternative 1 (No Action) and the Preferred Alternative are similar across these different geographies and parcel types, and because neighborhoods tend to be similarly heterogeneous with respect to parcel type as shown in Exhibit A-24, we anticipate that ADU production would be generally dispersed throughout Seattle. This would continue the pattern observed empirically in historical permit data, as shown in the distribution of existing ADUs in Seattle in Exhibit 4.1-1.

- 30** The EIS is a programmatic environmental impact statement that uses an appropriate level of analysis to evaluate the effects of a broad proposal that may include a wide range of individual projects, and that may be implemented over a long timeframe, and/or across a large geographic area. SEPA does not require that the City prepare separate analyses or documents for each ADU constructed.

For programmatic proposals, SEPA Rules require that an EIS contain only a general discussion of the impacts of alternative proposals for plans, land use designations, or implementation measures; site specific analyses are not required for individual geographic areas (WAC 197-11-442(3) and (4)). Therefore, analysis of certain impacts is appropriate at a broader scale that does not detail impacts at a project level or sub-areas scale for some aspects.

This EIS includes information about how conditions vary across Seattle neighborhoods. Please see Exhibit 4.4-6 for a map identifying unimproved sidewalks in Seattle. See also Exhibit 4.4-10, Exhibit 4.4-11, and Exhibit 4.4-12, which identify the existing transit network and illustrate areas of Seattle according to their proximity to frequent transit, respectively. Please see Exhibit 4.2-8 for a map added to the Final EIS illustrating tree canopy in the study area. Please see Chapter 3, History and Planning Context, for discussion and several exhibits illustrating the variation in cultural, economic, and social conditions across the city. In particular see Exhibit 3-12, which shows population by race, and Exhibit 3-15, which shows housing tenure across the city. See also Exhibit 4.1-16, Exhibit 4.1-18, and Exhibit 4.1-19, which present further information about demographic and socioeconomic variation across neighborhoods in the study area.

### **Reichert, William and Geness**

- 1** Thank you for your comment. The comment is noted.
- 2** Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

### **Rental Housing Association of Washington**

- 1** Thank you for your comment. The comment is noted.
- 2** The city is not considering a change to the zoning classification as part of the proposed Land Use Code changes. This suggestion is outside the scope of the analysis.
- 3** Please see Section 3.2, Planning Context, for information added in the Preferred Alternative and a discussion of additional strategies related to reducing permitting costs.

- 4 Thank you for your comment. The comment is noted.
- 5 The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to non-conforming house types and uses are not considered as part of the proposed Land Use Code changes and are outside the scope of the EIS.
- 6 The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations that would modify minimum lot size requirements or changes to lot subdivision regulations to create a new principal unit are outside the scope of the EIS.
- 7 Thank you for your comment. The comment is noted.

### **Ritzman, Mary**

- 1 Thank you for your comment. The comment is noted.

### **Roll, Helen**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 3 Thank you for your comment. The comment is noted.

### **Ross, Chuck**

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 2 Thank you for your comment. The comment is noted.

### **Rowen, Suzanne**

- 1 Thank you for your comment. The comment is noted.

### **Roxby, Alison**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 The Draft EIS was issued with a notice of availability and the methods of publication required in SMC 25.05.510 Public Notice.

### **Rulifson, Brian**

- 1 Thank you for your comment. The comment is noted.

- 2 The analysis of the potential impacts to public services and utilities in the EIS for the Seattle 2035 Comprehensive Plan (Seattle 2015 and Seattle 2016) is incorporated by reference into this EIS. The Comprehensive Plan EIS and this EIS both consider the same question: How does projected growth in the city affect the ability of public services and utilities to provide adequate service? The Comprehensive Plan EIS thoroughly analyzed the potential impacts to public services and utilities from a projected growth of 70,000 households in the city through 2035, including approximately 8,400 households in areas outside designated urban villages. Since the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS, we considered the estimated increase in households from the proposed Land Use Code changes and evaluated the impacts in the context of the changes analyzed in the Comprehensive Plan EIS.
- 3 As noted in Section 4.5, Public Services and Utilities, Seattle Public Schools plans for student populations changes in the facility planning and is actively planning for future growth.

### **Scherba, Elaine**

- 1 Thank you for your comment. The comment is noted.

### **Scherba, Stephen**

- 1 Thank you for your comment. The comment is noted.

### **Schneider, S.**

- 1 Thank you for your comment. We were unable to open the attachment and did not receive a response to requests to provide an alternative.

### **Schweinberger, Sylvia**

- 1 Thank you for your comment. The comment is noted.

### **Seattle Planning Commission**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes allowing two ADUs (either two attached or one attached and one detached). Allowing for multifamily structures is outside the scope of this EIS; please see the frequent comment response concerning multifamily zoning.
- 3 The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 4 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 5 The Preferred Alternative includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet.

- 6 The Preferred Alternative would increase the maximum size of a DADU to 1,000 square feet.
- 7 The Preferred Alternative includes allowing additional height for DADUs depending on lot width.
- 8 The Preferred Alternative includes allowing for additional rear yard coverage for a single-story DADU provided construction does not result in tree removal.
- 9 The Preferred Alternative would increase the maximum household size to up to 12 unrelated people if a lot has two ADUs.
- 10 The Preferred Alternative does not include an affordability requirement.
- 11 The Preferred Alternative includes an FAR limit, with an exemption for any floor area in an ADU f to incentivize ADUs.
- 12 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 13 See response to comment #12 above.

### Seattle Public Utilities

- 1 Please see Section 4.5, Public Services and Utilities, for updates to the discussion on sewer and stormwater impacts.
- 2 Thank you for your comment. The comment is noted.

### Seattle Urban Forestry Commission

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 2 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 3 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 4 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 5 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 6 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 7 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

- 8 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use and exceptions added to the Preferred Alternative to preserve trees.
- 9 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 10 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes an FAR limit in single-family zones.

### Sequeira, Debra

- 1 Thank you for your comment. The comment is noted.

### Siegfriedt, Sarajane

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs. Please also see Section 4.1, Housing and Socioeconomics, for a discussion of how removing the owner-occupancy requirement meets the objective of the EIS to increase ADU production.
- 3 Thank you for your comment. The comment is noted.

### Sightline

- 1 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative and the owner-occupancy requirement. See Section 4.1, Housing and Socioeconomics, for analysis of removal of the owner-occupancy requirement.
- 3 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 4 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 5 Thank you for your comment. The comment is noted.
- 6 Thank you for your comment. The comment is noted.
- 7 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 8 The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Modifying the definition of household size that applies to all zones is outside the scope of the EIS.

- 9 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 10 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 11 Please see Section 4.1, Housing and Socioeconomics, for updated text that provides more detail on the FAR limit included in the Preferred Alternative.
- 12 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.

### **Smith, Alan**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.

### **Steckler, Mike — 1**

- 1 Thank you for your comment. The comment is noted.

### **Steckler, Mike — 2**

- 1 All comments submitted on the Draft EIS have been included and are publicly available in this Final EIS.

### **Stixrod, Carl**

- 1 Thank you for your comment. The comment is noted.

### **Sucher, David — 1**

- 1 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative and updated discussion of MHA.

### **Sucher, David — 2**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The discussion in Appendix A has been updated in this Final EIS.

### **Sutherland, Loretta**

- 1 Please see Section 4.2, Land Use. This section has been updated to include a discussion of parks and open space.
- 2 Thank you for your comment. The comment is noted.

- 3 Thank you for your comment.

### **Taylor, Patrick**

- 1 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 2 The Preferred Alternative includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet. Please also see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 3 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 4 The Preferred Alternative includes allowing two ADUs (either two attached or one attached and one detached).
- 5 The Preferred Alternative includes allowing additional height for DADUs and would increase the maximum size of a DADU to 1,000 square feet.
- 6 The Preferred Alternative includes allowing for additional rear yard coverage for a single-story DADU provided construction does not result in tree removal.
- 7 Please see Chapter 2, Alternatives, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs.
- 8 The Preferred Alternative includes an FAR limit, with an exemption for any floor area in an ADU to incentivize ADUs.
- 9 The Preferred Alternative does not include an affordability requirement.

### **Tenenbom, Buzz**

- 1 Please see the frequent comment response regarding individual neighborhood review.
- 2 Please see the frequent comment response concerning impacts to parking.
- 3 Thank you for your comment. The comment is noted.
- 4 Thank you for your comment. The comment is noted.

### **TreePAC.org, Ellison, Richard**

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 2 SEPA regulations require a 30-day public comment period with a 15-day extension upon request. The public comment period for this EIS was for 45 days to give the public extra time to contemplate the proposal.
- 3 Additional discussion of impacts to tree canopy has been added to Section 4.2 of this Final EIS.
- 4 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

- 5 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 6 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 7 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 8 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 9 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 10 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 11 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 12 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 13 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 14 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

### University Park Community Club

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding individual neighborhood review.
- 3 Thank you for your comment. The comment is noted.
- 4 Thank you for your comment. The comment is noted.
- 5 Please see Section 4.2, Land Use. This section has been updated to include a discussion of historic resources.
- 6 Thank you for your comment. The comment is noted.
- 7 Thank you for your comment. The comment is noted.
- 8 Thank you for your comment. The comment is noted.
- 9 Thank you for your comment. The comment is noted.
- 10 Thank you for your comment. The comment is noted.

### Wall, Irene

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding parking impacts.

- 3 Thank you for your comment. The comment is noted.
- 4 Thank you for your comment. The comment is noted.
- 5 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 6 As outlined in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would result in the creation of more ADUs under Alternative 2, Alternative 3 and the Preferred Alternative compared to Alternative 1 (No Action). While construction cost certainly impedes construction of additional ADUs, the analysis in the EIS shows that existing regulations also act as a barrier.

### **Warner, Kurt**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Alternative 1 is the No Action Alternative. It considers the potential impacts from existing Land Use Code regulations. Please see Chapter 2, Alternatives, for a discussion of an ownership requirement included in the Preferred Alternative.
- 4 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 5 Thank you for your comment. The comment is noted.

### **Wilkins, Steve**

- 1 Thank you for your comment. The comment is noted.

### **Williams, Bonnie**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response concerning impacts to parking.
- 3 Please see the frequent comment response regarding individual neighborhood review.

### **Williamson, Bill**

- 1 Thank you for your comment. The comment is noted.
- 2 The proposal evaluated in the EIS considers changes to the Land Use Code for the construction of ADUs in single-family zones. Creating a new overlay zone is not considered as part of the proposed Land Use Code changes and is outside the scope of the EIS.

### **Woods, Jerry**

- 1 Thank you for your comment. The comment is noted.

## 5.4 Responses to Comments Submitted through the Online Comment Form

This section includes Draft EIS comments submitted through our online comment form and provides responses to those comments. They are listed in alphabetical order according to last name. Note that the comment form included fields for name and email address. Many commenters left the name field blank. In these cases, rather than identify commenters by their email addresses, we list these comments as "anonymous."

We present online comments and responses in the following format:

### Commenter name

Online comment.

» **Response to online comment.**

**Exhibit 5-3** Commenters Providing Comments through the Online Comment Form

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Basom, Ezra	5-96
Baumgarten, Eric	5-96
Becker, Arnold	5-96
Becker, Dan	5-96
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Bicknell, Natalie	5-97
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<b>Cababa, Sheryl</b>	5-105
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<b>Caron, Chad</b>	5-107
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<b>Catalano, Gus</b>	5-109
<b>Cave, Donn</b>	5-110
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<b>Chu, Gerry</b>	5-114
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## RESPONSES TO COMMENTS SUBMITTED THROUGH OUR ONLINE COMMENT FORM

### Abolins, Talis

The alternatives should include features necessary to minimize displacement risk, and incentivize affordable units. For instance, how about conditioning the creation of the third unit on rent restriction? Ownership of DADU and ADU should remain with the property owner.

- » **Please see Section 4.1 for a discussion of displacement and Section 3.2, Planning Context, for information related to costs and financing.**

See above. The ADU / DADU program is an important opportunity to minimize displacement for owners struggling with increasing property tax burdens. If a third unit is allowed, it should be subject to an affordability performance requirement -- with affordability options for either rent restriction, or an ownership sales price restriction tied to an objective benchmark, and protected by covenant.

- » **Please see Section 3.2 Planning Context, for information related to costs and financing**

The ADU / DADU presents a rare opportunity for existing Seattle residents to stay in place, and generate revenue to offset tax burdens (for seniors and others) and avoid displacement. Some of the graphics showing the multiple DADU's on a city lot reflect substantial damage to neighborhood landscapes, tree canopy, architecture, and historic value. Balance is the key"" mitigation should be more thoughtfully outlined, so the decisionmakers can assess the true impacts and the options to manage these threats. There must be restrictions on the VRBO conglomerates that are buying up small units around the City -- removing them from housing stock, and profiting with transitory residents and, in some cases, illegal activities (prostitution in VRBO units is confirmed on Capitol Hill). A VRBO ADU can avoid displacement for a Seattle resident facing rising property taxes "" and facilitate extended family support arrangements. Vacation rental activity should be limited to owner-occupied ADU and DADU's. Don't let the lobbyists bake the cake again. Corporate VRBO and Air B&B operators are making a killing with little benefit for the City.

Historic districts (federal, state and/or local) must be considered and mitigated from these DADU opportunities. A design review process should kick in to require accommodation of architectural character for DADU's within or adjacent to historical resources -- and to the extent the City has not yet documented the existence of these resources in the EIS -- it should do so, or at least have a mitigation strategy that allows adjacent residents notice and an opportunity to identify adjacent historic resources in areas not yet surveyed by the City

- » **Please see Section 4.2, Land Use. This section has been updated to include a discussion of historic resources. Please see Chapter 3, History and Planning Context, for information added in the Final EIS on the City's short-term rental regulations.**

The graphics demonstrate the potential for severe impacts on land use bulk and scale, as well as aesthetics and historical resources. Design review must be enhanced to avoid the substantial risk of harm to these EIS values.

- » **Please see Section 4.2, Land Use, for the analysis of potential impacts from changes to density and scale and a new section added in this Final EIS that discuss Historic Resources. Please also see Section 4.3, Aesthetics, for analysis of aesthetics impacts.**

## Adams, Ryan

I strongly support Alternative 2. We don't need more parking. I'm in my 30's. Most of my friends don't own cars or drive regularly.

» **Thank you for your comment. The comment is noted.**

## Adkins, Matt

Housing prices are rising dramatically in Seattle and in the suburbs as our city continues to grow to more than 700,000 people, and we will probably continue to grow for the foreseeable future. I think that we should create more opportunities to build homes so that the supply of homes can keep up with our population growth. I believe that encouraging more ADUs and DADUs to be built in the city can help increase the supply of homes and provide more opportunities for people.

» **Thank you for your comment. The comment is noted.**

Cities like Portland and Vancouver BC seem to be also trying to add more ADUs and DADUs to their housing supply. Hopefully Seattle can monitor the performances and outcomes in those cities to determine best practices Seattle can follow.

» **The City has previously required ongoing monitoring of ADUs and may include that requirement in the final legislation.**

## Alexander, Noelani

I have been eagerly waiting for this this EIS to finish and for the changes to DADUs to happen so we can build a structure at a price point that creating a rental will be a long term investment and will keep us in our home during our retirement.

» **Thank you for your comment. The comment is noted.**

I like to think the character of the neighborhoods will be better preserved with the addition of AADUs and DADUs then it might be with the construction of town homes, new construction, and other multi-family projects.

» **Thank you for your comment. The comment is noted.**

Alternative 2 would be an excellent way to increase the possibility that homeowners could build DADU's and AADU's in a cost effective way. Alternative 3 is still an improvement on the existing code, but would limit many options that would appeal to me, as a homeowner, who would like to build a DADU that would give me a rate of return worth investing in.

» **Thank you for your comment. The comment is noted.**

Watching the city change, as many long time residents are forced to leave due to the expensive and limited housing options has been difficult. I feel fortunate to be able to have a single family home in this city, and also fear that, in time, this will become less affordable for me as well. I do see this as a small part of a solution for keeping people in their homes as taxes increase and keeping low to mid income renters living in the city.

» **Thank you for your comment. The comment is noted.**

I do worry about parking in the Alternative 2. Ideally, we would not need off street parking in our neighborhoods because of the other transport options. However, parking will be a challenge for

individuals. My profession forces me to drive larger than average vehicles (work trucks) through our neighborhoods and I see the challenge getting worse, not better and removing the off street parking restriction on Alternative 2 is the only issue I have with the proposal.

» **Thank you for your comment. The comment is noted.**

## Alexander, Zachary

My household is made up of 2 adults, 2 children, and a rotating cast of in-laws. I live in District 5. I want more housing because it's critical to address climate goals. Higher density allows more people to be closer to critical infrastructure like bus stops and grocery stores. Personally, I think I have the right to construct additional "in-law" housing in my backyard. I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing

elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

### Amster-Burton, Laurie

I support Alternative 2.

- » **Thank you for your comment. The comment is noted.**

### Andreini, Elizabeth

Please make larger apartment developments provide off-street parking for residents to stop clogging up neighborhoods and business areas. Then it will be possible to absorb the additional cars in neighborhoods for houses which have "mother-in-law" cottages .

- » **Thank you for your comment. The comment is noted.**

I support allowing broader flexibility for "mother-in-law" cottages on single family lots. I believe that will substantially help younger and lower income individuals find places to live that are closer to work/ education opportunities and provide better access to public transportation.

- » **Thank you for your comment. The comment is noted.**

Please give families the flexibility to house extended family members or provide options for long-term rentals on their property. This will help increase density and allow more housing in the city as well as provide rental income options to offset rising costs of housing allowing more people to stay in the city and decrease traffic.

- » **Thank you for your comment. The comment is noted.**

### Ankrom Moisan Architects

This comment is directed towards simplicity and alignment of zoning with financial lending. Dwelling units is a term in common through Building codes and Financial lending institutions. Accessory Dwelling units whether detached or attached is NOT a qualified term and traditional funding vehicles are NOT available at this time. Under FHA - up to 4 units may be financed as a single family home loan. By declaring a unit something other than dwelling unit, it confuses the financing agencies and reduces number of lending sources to fund the work. This adds unnecessary cost and time to process and works at cross purposes the the intended goal of creating more homes and affordable homes within single

family zoned city districts. Since the end goal is to increase the number of dwelling units within a single family housing zone, I propose that the terminology simply call the units 'Dwelling Units' and delete unnecessary nomenclature of AADU or DADU that creates confusion with funding and lending agencies. For example, the number of dwelling units on a single family zoned property may be increased from 1 dwelling unit to 4 dwelling units when the following provisions are met....

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs. Please also see the frequent comment response discussing multifamily zoning, which defines those terms and distinguishes accessory units and other dwelling types.**

### Baab, Mike

Part of transitioning away from car dependence requires no longer subsidizing parking. I support any initiative that removes mandatory parking requirements.

- » **Thank you for your comment. The comment is noted.**

I vastly prefer Alternative 2. We need more housing in this city. The solution is obvious: Make it as easy as possible to build all housing types, including ADU/DADUs

- » **Thank you for your comment. The comment is noted.**

I'm disappointed that this process has been delayed for so long. I'd like ADUs/DADUs to be expanded and for the EIS process to not be weaponized for delay in the future. It needs to be easier for cities to do the right thing. This was an easy choice 3 years ago and it's an easy choice now.

- » **Thank you for your comment. The comment is noted.**

Everyone likes pretty neighborhoods. The problem comes when we prioritize them above our moral imperatives, such as housing the homeless and ensuring affordability in our city. Expand them.

- » **Thank you for your comment. The comment is noted.**

I am not concerned in the slightest about scale or neighborhood character. I want to live in a city where families of all income levels can stay. Accessory dwelling units are a huge part of this. Make it easier to build them.

- » **Thank you for your comment. The comment is noted.**

The evidence is clear, and has been for years: The existence of single-family zoning is a giveaway to the whitest and wealthiest Seattle residents. Do the right thing and expand the right to build ADU/DADUs.

- » **Thank you for your comment. The comment is noted.**

Let's adequately fund our public utilities!

- » **Thank you for your comment. The comment is noted.**

### Badwin, Emory

8 unrelated people on one property should be the maximum. Any more than that, and there will be big impacts to noise and parking.

- » **Thank you for your comment. The comment is noted.**

I cannot tell you strongly enough how important I think it is that the owner occupancy requirement remain in place. I have seen too many absentee owners let their rental homes become 'party houses' that detract from the neighborhood. If the owner does not reside on the property, then they don't have much incentive to ensure harmony with neighbors. It's not fair to the other homeowners if an absentee owner lets their house be used by renters who don't care about their neighbors and reduce the quality of life in the neighborhood. This is a big, BIG deal to everyone I talk with about the ADU options. Please do NOT get rid of the owner occupancy requirement.

» **Thank you for your comment. The comment is noted.**

I prefer alternative #3 because I think it is very important that the owner occupancy requirement remain in place. I have seen too many absentee owners let their rental homes become 'party houses' that detract from the neighborhood. If the owner does not reside on the property, then they don't have much incentive to ensure harmony with neighbors. It's not fair to the other homeowners if an absentee owner lets their house be used by renters who don't care about their neighbors and reduce the quality of life in the neighborhood. This is a big, BIG deal to everyone I talk with about the ADU options. Please do NOT get rid of the owner occupancy requirement.

» **Thank you for your comment. The comment is noted.**

I think it is fine to not require an off-street parking space for a single ADU, but I feel strongly that there needs to be an off-street parking space for a second ADU. Parking has become so tight in Seattle, that we cannot afford to keep adding density without finding a place to put the cars. It's not fair to all of the other neighbors if there are 12 people living on one property who hog all of the parking along their street.

» **Thank you for your comment. The comment is noted.**

## Balsky, Sonia

I am strongly in favor of Alternative 2. Alternative 3 is better than no action, but seems less permissive especially with regards to size, which is important. I think there should be very few barriers to building ADUs on any lot - in fact, I'd support a new option that further reduces lot size requirements and increases allowable ADU size and placement.

» **Thank you for your comment. The comment is noted.**

The visual character will be fine, and also, is not important compared to increasing needed housing options.

» **Thank you for your comment. The comment is noted.**

Alternative 2 definitely seems like the best choice given these factors as well.

» **Thank you for your comment. The comment is noted.**

Density is critical - finding ways such as this to increase density in single family zones will be very helpful.

» **Thank you for your comment. The comment is noted.**

More transit, less parking. Thank you forever.

» **Thank you for your comment. The comment is noted.**

## Basom, Ezra

I hope policy makers will continue to explore ways to create incentives for landowners to build housing that serves moderate income families, there is a 'missing middle' in Seattle.

» **Thank you for your comment. The comment is noted.**

Existing zoning rules create housing types that favor the wealthy. The rules to add additional units should favor construction of lower cost housing. In addition to rental housing I strongly urge policy makers to consider options for homeowners to sell ADU units to individuals that are purchasing homes as part of a land trust such as Homestead Community Land Trust. The sale of homes as part of a land trust creates permanent affordable housing.

» **Thank you for your comment. The comment is noted.**

I strongly support removing regulatory barriers so that its easier to build additional housing units on single family zoned lots.

» **Thank you for your comment. The comment is noted.**

Laneway housing along alleys is athetically pleasing.

» **Thank you for your comment. The comment is noted.**

Single family zones in Seattle historically permitted many different housing types, many of the historical apartments and duplexs continue to exist in these neighborhoods. Returning to this model encourages housing diversity which in turn supports people who have different sized incomes and backgrounds. Existing policies create communities that are largely white and wealthy.

» **Thank you for your comment. The comment is noted.**

The notion that parking should be required for any housing creates a system that makes housing more expensive to build and less accessible to people of moderate incomes. Parking should not be required anywhere in my opinion.

» **Thank you for your comment. The comment is noted.**

## Baumgarten, Eric

Remove single family zoning entirely from Seattle. It was born from classist and racist sentiment and continues those ideas into the present.

» **Thank you for your comment. The comment is noted.**

## Becker, Arnold

I am opposed to changing single family neighborhoods into multi family units.

» **Thank you for your comment. The comment is noted.**

## Becker, Dan

I support making it easier for property owners to permit and build ADUs and backyard cottages. Our city would greatly benefit from increasing the number and variety of housing choices available in single-

family zones. As a homeowner in a single family neighborhood I would not be unhappy to see every one of my neighbors do this.

- » **Thank you for your comment. The comment is noted.**

## Beetem, Jennifer

I am in favor of Alternative 3 for its lower impact on tree canopy and vegetation.

- » **Thank you for your comment. The comment is noted.**

I am in favor of Alternative 3 for the reduced amount of teardowns of existing houses and greater spacing around redeveloped main houses under FAR. Maintaining a small amount of green buffer vs. building right to the property line not only improves aesthetics, it is good for people psychologically.

- » **Thank you for your comment. The comment is noted.**

I am in favor of Alternative 3. Although the number of affordable units created will be slightly lower, Alternative 3 will precipitate less displacement, which has devastated many Seattle communities.

- » **Thank you for your comment. The comment is noted.**

I prefer Alternative 3, specifically for the owner-occupancy requirement and the MHA requirement for a 2nd ADU/DDU. However, I would prefer to see incentives that result in affordable rents for rentable ADUs/DDUs rather than only paying into the affordable housing fund since the square footage for these units is so modest it will limit the impact of the affordability contribution. I am in favor of the owner-occupancy requirement to promote housing as housing and to ensure homeowners have a personal stake in the community they live in.

- » **Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative would remove the owner-occupancy requirement; two ADUs would be allowed only if the property is under the same ownership for at least one year.**

Does the parking usage projections include the fleets of carshare vehicles like ReachNow and Car2go that use street parking? Can we encourage homeowners to use their garages for cars instead of for storage?

- » **Please see Section 4.4, Parking and Transportation, for discussion of parking and transportation. Any carshare vehicles would have been counted as any other car parked on the street.**

## Bicknell, Natalie

I wholehearted support the idea of ADUs in Seattle neighborhoods and I hope that this plan moves forward. I also hope that the City considers offering Housing Cooperatives the opportunity to build multifamily dwellings in single family zoned areas. We need to extend both affordable rental and ownership opportunities to city residents and Housing Cooperatives are an excellent means of increasing ownership. I live in a HOA townhome that is affordable and community focused and I would like to see other people have the same chance to secure similar ownership opportunities.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code change**

ADUs are an excellent way to increase density and maximize land use in single family neighborhoods while maintaining the general aesthetic and feel of the neighborhood.

» **Thank you for your comment. The comment is noted.**

Design is important and I am glad the City is taking steps to ensure that aesthetics are considered in this plan.

» **Thank you for your comment. The comment is noted.**

Parking and transportation scarcity are issues every growing city faces. I feel strongly that ADUs are a great means of increasing density because they allow for that density to occur as infill in neighborhoods throughout the city.

» **Thank you for your comment. The comment is noted.**

I strongly support making it easier for home owners to build ADUs.

» **Thank you for your comment. The comment is noted.**

ADUs are an important means of generating affordable housing and allowing home owners to collect revenue from their property.

» **Thank you for your comment. The comment is noted.**

## bloom, gail

alternative 2 best reduces sprawl and therefore concentrates resources for public services... good services are expensive and should be well utilized. transit ridership works better when there is density - similarly all services function when there is concentration of effort - IMO.

» **Thank you for your comment. The comment is noted.**

housing is appropriate in existing residential districts. families are smaller now and so the numbers of residents per parcel could often be the same, even with a secondary unit. ownership is irrelevant to use. alternative 2 will likely produce more housing in established neighborhoods. seattle permitted housing to be developed where services were absent or underserved. that is the larger civic challenge in my mind.

» **Thank you for your comment. The comment is noted.**

parking is challenging throughout seattle. parking is analogous to musical chairs and building without it, assumes that your neighbor won't want a car. uber or whatever won't solve congestion - parking maybe - but it really causes more cars to circulate and slows overall travel speed - eating into transit ridership. alternative 2 reduces pressure to build in non-residential neighborhoods without schools and parks, because parents w kids for sure will still need to haul those children to sports with their bats and balls etc across town from childcare to school... and not on the backs of their bikes.

» **Thank you for your comment. The comment is noted.**

thank you for the opportunity to comment on the alternatives - i favor more flexibility, more than even contemplated by the zoning changes, but support the goals of alternative 2.3

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

alternative 2, the most permissive, is more protective of setbacks and rear yards than i would personally think is appropriate. multistory secondary units are by their nature inefficient w staircases and inaccessible for aging and disabled.

» **Thank you for your comment. The comment is noted.**

infill housing will reduce the gross impacts of new development in large complexes. existing neighborhoods have public resources than the new neighborhoods are missing - schools, libraries, parks, local retail - all things that make cities communities. alternative 2 best achieves that objective supporting more housing... the underlying real estate economics are more a function of external dynamic economy. a recession or downturn of a major sector would do more to impact the housing market's economic structure than this zoning change. think 2009 or boeing's impact in the 70s.

» **Thank you for your comment. The comment is noted.**

many single family neighborhoods have by my observation, large homes with large footprints. one wonders if those building additions were even built with permits or earlier zoning was just more permissive.

» **Thank you for your comment. The comment is noted.**

## Bloom, Robert

Please adopt the following changes:

1. Lots in single-family zones should be entitled to have an AADU and a DADU or two AADUs.
2. No off-street parking should be required.
3. There should be no minimum lot size for an ADU.
4. In terms of size, should allow AADUs up to 1,200 square feet, excluding garage and storage areas, DADUs up to 1,200 square feet, excluding garage and storage areas. Additionally, AADUs or DADUs should be allowed to exceed 1,200 square feet if the portion of the structure in which the ADU is located existed on December 31, 2017, and if the entire ADU is located on one level.
5. Increase height limits by 1 to 3 feet higher than existing limits, depending on lot width. Allow 1 to 2 additional feet for a DADU that meets green roof standards.
6. The maximum household should be changed to allow any number of related people, or up to eight unrelated people, can live on lots in single-family zones with an AADU or a DADU. If the lot has an AADU and a DADU, the limit should be 12.
7. Height limit exceptions should be modified to allow for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.
8. The front entrance location for DADUs should be on any façade if they are 10 feet from the lot line and if located on the façades facing the nearest side or rear lot line (unless abutting right-of-way).
9. Impose Floor Area Ratio requirements. New construction should be subject to FAR limits in single-family zones. New houses (i.e., principal structures) should be subject to a FAR limit of 0.5 or 2,500 square feet, whichever is greater. Below-grade floor area and floor area in DADUs should be exempt. For existing houses in single-family zones exceeding the FAR or 2,500-square-foot limits should be allowed to convert existing space to an AADU and add a DADU subject to the size limit above.

10. In terms of rear lot coverage, the code should be changed so that 60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is 15 feet or less in height. Rear yard coverage for structures other than a DADU should not exceed 40 percent.

11. Find ways to reduce permitting costs.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

### Bostrom, Kevin

I support alternative 2

- » **Thank you for your comment. The comment is noted.**

### Bradford, Ethan

I'd like to see a maximum density option. There are a couple of features in Option 3 that allow more density than Option 2, in particular allowing two AADUs. Given the severity of the housing shortage in Seattle, we need the most density we can reasonably achieve.

- » **Thank you for your comment. The comment is noted.**

Seems clear enough.

- » **Thank you for your comment. The comment is noted.**

### Brandalise, James

As long as they are limited to rear yards, I will not--despite having an almost 18,000 square foot lot--be able to construct a DADU. My lot is over 285 feet long, but the house is situated at the rear, and the back yard is inaccessible for building.

I would very much like to construct a DADU, because despite owning my own home, I am close to being displaced by the rising tax burden. Being displaced from a home my father built with own hands in 1963, adjacent to the Rainier Beach urban farm that he grew up on (I am not very happy with Seattle at the moment).

- » **DADUs can be located in front of the main house if it is outside of the required front yard. Please see Exhibit 2-6 that illustrates required yards in single-family zones.**

I would be in favor of Action Alternative 2, although I do not believe that it provides enough financial incentives--fee reductions--to convince me to build a DADU, as much as I would like to.

- » **Thank you for your comment. The comment is noted.**

### Bronson, Eric

I live in district 6, in Greenwood just off of Aurora. I wish that ADUs were plentiful in my neighborhood. That would make Greenwood a more vibrant place to live and play. It would also allow more folks of diverse income levels to live in an area that has high access to opportunities.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.
10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.
11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification.

Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Brooks, Kyle

I prefer as loose of regulations around building accessory units as possible. Excessive regulations like owner-occupancy and parking minimums slow down our ability to build new housing and therefore prevent housing costs from decreasing.

Of the options available, I support Alternative 2 as the best path forward for Seattle. However, I would prefer an even less restrictive approach to building accessory units that would allow for triplexes and quadruplexes in areas zoned for single family.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code and the frequent comment response regarding multifamily zoning.**

ADU's are a good way to strike a balance between redevelopment and preserving historical buildings because they allow homeowners to build housing adjacent, below, or on top of existing "legacy" structures. For this reason, ADU's will help preserve Seattle's architectural heritage.

- » **Thank you for your comment. The comment is noted.**

Too much of Seattle's growth has been absorbed by high-density areas, which tend to be poorer than single family areas. Allowing AADU's and DADU's to be built will help distribute the burden of Seattle's increasing population more equitably by allowing single family neighborhoods to make contributions to density.

- » **Thank you for your comment. The comment is noted.**

We cannot fight global warming without building dense housing. The environmental review process should remember that every ADU built in Seattle prevents sprawl in the suburbs and shortens commute times and greenhouse gas emissions.

- » **Please see the frequent comment response concerning the proposal's effects on climate change.**

We must eliminate single family zoning in Seattle.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to the underlying zoning are not considered as part of the proposed Land Use Code changes and are outside the scope of the EIS.**

Reducing car use is essential for fighting global warming. Also, advances in our region's public transportation, in self-driving cars, and in the availability and cost of electric bicycles are all dramatically decreasing the public's demand for street parking. For these reasons, I believe we should not have parking minimums for ADU's.

- » **Thank you for your comment. The comment is noted.**

Property taxes should be able to provide for the increased utilization of public services due to building ADU's.

Adding fees to the development of accessory units will reduce overall housing affordability.

- » **Thank you for your comment. The comment is noted.**

## Brown, Richard

I support Alternative 1(No Action Alternative)

- » **Thank you for your comment. The comment is noted.**

## Buhlmann, Glen

We need to make it easier to build more housing of every type in every part of the city. I support alternative 3. However, I don't think we need to require any parking even if 2 or 3 D/ADU's. We have too much parking already. Requiring more will just make the homes more expensive and this is only being considered to appease wealthy homeowners who feel that they own the on-street parking in their neighborhoods and anyone new who moves into the neighborhood wouldn't have any similar claim to owning it. This is nonsensical. Do not require additional parking.

- » **Thank you for your comment. The comment is noted.**

Every neighborhood has multi-family housing since it used to be legal everywhere in the city. We created single family zoning and setback requirements to artificially inflate the cost of housing in white neighborhoods to keep out people of color. Stop supporting these racist policies. They must go.

- » **Thank you for your comment. The comment is noted.**

It is not the city's business to worry about maintaining the wealth of landowners. This is not medieval/feudal times. The existing homeowners are not lords. Allowing ADU's will prevent displacement. It will allow cost-burdened homeowners to be able to afford their mortgages by giving them income from 1 or 2 ADU/DADU's.

- » **Thank you for your comment. The comment is noted.**

We need to abolish single family zoning. It was created for racist reasons to keep white neighborhoods white. The city cannot continue to support this relatively recent restrictive zoning. Townhomes and small apartment buildings used to be legal everywhere in the city. Stop listening to wealthy single family homeowners who are digging up every excuse they can think of so they don't have to admit that they don't want brown, black or not-wealthy people living near them.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units and rezoning single-family zones are outside the scope of the EIS.**

More housing. More housing of all types. More housing everywhere. Get rid of single family zoning and minimize setback requirements for all housing. These were created for racist reasons to segregate neighborhoods. Seattle needs to stop supporting these policies which are still allowing wealthy white neighborhoods to exclude others from living there.

- » **Thank you for your comment. The comment is noted.**

ADU/DADUs are for people with less income than those who own or rent SFH's. These are people who are less likely to own cars. It makes absolutely no sense to require any additional parking even if building 2 or 3 ADU/DADUs. Get rid of the parking requirement and choose the Alternative 3 which allows more ADU/DADUs

- » **Thank you for your comment. The comment is noted.**

This is nonsense. The number of homes we are talking about is infinitesimal. It will have no impact.

- » **Thank you for your comment. The comment is noted.**

## Burke, Cynthia

I believe Alternative 2 is the path to take.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is the best option

- » **Thank you for your comment. The comment is noted.**

Alternative 2

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is the best option

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is the best option, although the owner should have the option to specifically say there is no parking for the unit and show a preference for non-car renters.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is the best option

- » **Thank you for your comment. The comment is noted.**

Thanks for sharing analysis. I think a property-tax reduction in exchange for below-market rental rates on DADU should be part of policy. Lower rents could allow more people who earn below median to live in the city. That includes new college grads, teachers, city workers, restaurant workers, etc.

Lower property taxes allow homeowner to limit tax costs after incurring significant costs to improve to their property to provide a rental.

The homeowner is taking on one of the social responsibilities - providing lower-income housing - that the city might otherwise have responsibility for - and should receive some tax relief as long as they rent -20% below market (or whatever a reasonable percentage would be).

While the homeowner may increase their equity by adding a DADU, until they sell the house and receive the equity, they are only taking on risk (the house may NOT increase in equity over time), taking on construction expense, and losing space and privacy. The ROI rate for a DADU with rents at market rates is about 6-8 years, not including property tax rate increases. The ROI rate with rent below market rates is about 10-15 years, not including property tax rate increases.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

## Burke, Paula

None of the action alternatives appear to have probable significant impacts. This EIS does an excellent job of demonstrating the overall lack of impacts from providing another option for addressing a critical housing shortage.

- » **Thank you for your comment. The comment is noted.**

I support the preferred alternative.

- » **Thank you for your comment. The comment is noted.**

## Burns, Gust

I encourage the adoption of Alternative 2.

- » **Thank you for your comment. The comment is noted.**

I support the elimination of "single family zoning" and the legalization of plexes (duplexes, triplexes, fourplexes, etc.)

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code change**

I support the elimination of parking requirements.

- » **Thank you for your comment. The comment is noted.**

## Cababa, Sheryl

The parking requirement needs to be removed. Our neighborhood has good access to public transportation, to bike shares, and alternatives to driving. It does not make sense to require parking as it's possible to reside in the neighborhood without a car. Most households -- including mine -- do not have space to add parking, but do have room to add an ADU or backyard cottage.

- » **Thank you for your comment. The comment is noted.**

The parking requirement needs to be removed. Our neighborhood has good access to public transportation, to bike shares, and alternatives to driving. It does not make sense to require parking as it's possible to reside in the neighborhood without a car. Most households -- including mine -- do not have space to add parking, but do have room to add an ADU or backyard cottage.

- » **Thank you for your comment. The comment is noted.**

## Cantor, Clara

We need to allow multiple in-house and detached units. It doesn't make sense that a large home with a basement apartment or two in-house apartments can't make use of a large property to also build a backyard cottage. In fact, families already used to sharing space with others might even be more inclined to build a backyard cottage than others. Are we worried about creating too many homes for people to live?

Additionally, get rid of the unrelated occupants limit. I have lived over the course of my life with many people who were unrelated to me. This is not the city's concern, and is rooted in racist, classist, assumptions about renters. Similarly, the owner-occupancy rule is unnecessary and should be removed. If an owner were to have to suddenly move for any reason, it doesn't make sense to have to evict residents and board up their backyard houses. Renters are just as valuable to a neighborhood as homeowners, and the rules shouldn't treat them differently.

» **Thank you for your comment. The comment is noted.**

More height for green roofs. Don't we want people to help retain stormwater during big rains? Green roofs are ideal for Seattle and we should be actively encouraging and incentivizing their construction.

» **Thank you for your comment. The comment is noted.**

The permitting process needs to be streamlined - in our current affordable housing state of emergency we should be making it easier for people to create housing units, on their own properties, not more difficult.

» **Thank you for your comment. The comment is noted.**

Remove the parking requirement. Why would a city that claims to want to reduce driving and greenhouse gas emissions require people to build car parking spaces whether they own a car or not? The city is actively reducing parking requirements in other developments near public transit. Why keep this antiquated rule in play?

» **Thank you for your comment. The comment is noted.**

Population has actually decreased over the last 50 years in most of these areas zoned for single-family homes. This means that public utilities have not been growing with the city's actual population. Scaling public utilities for growth in single-family zones can happen and will happen the same as it's happened in all other zones in Seattle.

» **Thank you for your comment. The comment is noted.**

We should be planning a city with more urban density, and backyard cottages are a perfect way to do so. Restricting large swaths of valuable land to single-occupancy homes doesn't make sense from a land use perspective at all. Traditionally, backyard cottages are most often used by family members, friends, and others that are in need of an affordable place to live. Help Seattleites help others by allowing them to build backyard cottages.

» **Thank you for your comment. The comment is noted.**

## Caroline Umeda

As someone who has lived in ADU units for 12 of the 14 years I have lived in Seattle, I am strongly in favor of removing regulatory barriers that currently limit the construction of these housing options. ADU units have been affordable, flexible, safe, and community-building housing options for me, and have substantially impacted my quality of life in a city where affordable housing has become extremely challenging to find. I believe ADU units bring needed diversity to Seattle's housing options. They offer flexibility for many individuals who are either new to Seattle, here on short term bases, in transition, or those looking to invest in a neighborhood community. As a graduate student, ADU units opened up neighborhoods close to the UW campus that otherwise would be off limits to me as a renter and someone living on a graduate student stipend. They allowed me the opportunity to invest in a neighborhood and build relationships with my landlords who owned and lived in the main portion of the homes. They offered flexibility in lease terms and other logistics that large property management

companies do not. ADUs are a key part of the solution to Seattle's affordable housing shortage and barriers to their construction must be addressed and removed.

» **Thank you for your comment. The comment is noted.**

## Caron, Chad

The expense and effort of adding units to an existing property requires too much time for most home owners already struggling with time. The easier the city makes it to add density, the faster it'll address the housing crisis. Alt. 2 provided is a good start, but does not go far enough addressing the density required to maintain (let alone increase) affordability with the current zoning law. Make it easier.

» **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Alt. 2 is preferable for affordable housing development.

» **Thank you for your comment. The comment is noted.**

Alt. 2 is just relaxed enough to help encourage me to add a dadu to my property.

» **Thank you for your comment. The comment is noted.**

## Cary, Cameron

Dear Ms. Pennucci and the Seattle City Council,

As Seattle rental rates are continuing to increase and home ownership is out of reach for many, many of my friends and colleagues are choosing to move out of Seattle for cheaper cities such as Tacoma, Bellingham, or Vancouver. Some are moving closer so they can still work in Seattle, but I myself am considering moving several hours away and finding new employment as Seattle is no longer a livable location for the middle class or under.

ADU's are a solution that everyone can love. By increasing housing stock, they help keep rental prices down and they provide flexibility for homeowners, who can leverage their positions to help defray their cost of living, while also providing housing for others. I strongly support additional housing, because want Seattle to be affordable, and households living in dense, transit-rich cities typically generate ¼ to ½ the climate-destroying CO2 of those displaced to the suburbs. Neither of the existing "alternatives" maximizes the benefits and flexibility, though Alternative 2 is a good start. I strongly urge the following changes, but only if they wouldn't trigger another round of EIS (we can't afford the delay):

NO PARKING REQUIREMENT because requiring parking for ADUs that means we're privileging space for cars over housing for people.

Lots should be allowed 2 ADU's and a DADU; we want to encourage the subdivision of existing large houses, especially for empty-nesters. If someone has divorced or their kids have left home and they have space for a DADU and also a 2500 square foot house, it's good for everyone if they can do 2 ADU's as well as the DADU: it creates more affordable units, and allows people to stay in their own homes when circumstances change. See this Portland study about "internal conversions".

Remove the owner-occupancy requirement; it discriminates against renters and greatly disincentivizes building ADUs. Would you build and rent out a backyard cottage if you knew that its

existence would block you from later moving out and renting your main house? Additionally, why shouldn't existing rental houses also be able to add ADUs?

Incentivize affordable rentals by eliminating development charges for units when owners commit to holding them as rentals affordable to people making under 60% AMI for 15 years.

Incentivize green building standards like passivhaus and "living buildings", by eliminating development charges on any units built to those standards.

Incentivize rentals of more than one month by lowering development charges for homeowners who commit to month-plus-long rentals for at least 10 years (to encourage rentals for residents, and not AirBNB units).

Streamline permitting by dedicating specialized reviewers to ADU/ DADU projects. With just three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots or green roofs, residents who want to build an ADU have a clear and predictable pathway through permitting.

No MHA Fees. MHA fees can add 15K+ to the cost of an ADU, thus making it less likely people will build them. Much better to lower costs on ADU's held affordable, as mentioned above.

Lower the minimum square footage for lots that can support DADU's and ADU's to 2500. A 2500 sq. ft. lot can easily support a 2-story house with a footprint of 800 sq. ft. and an ADU inside, and also a DADU with a 400 sq. foot footprint.

We need to enable ADU's, not just allow them. These changes could make a big difference to how much affordable new housing gets built.

Sincerely,

Cameron Cary

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Cassidy, Sean

The link for this chapter is incorrectly pointing to 4.3 Aesthetics.

Adding parking requirements will raise the cost of building ADUs, which will raise rents overall. Rising rents is only good for rich landlords and hurts poorer renters.

- » **Thank you for your comment. The comment is noted.**

Strong preference for Alternative 2, followed by Alternative 3

- » **Thank you for your comment. The comment is noted.**

ADUs have no significant negative effect on aesthetics

- » **Thank you for your comment. The comment is noted.**

Looser regulations (like Alternative 2) for ADUs will help keep families together, lower the rent burden, and not substantially change the neighborhood characteristics.

- » **Thank you for your comment. The comment is noted.**

Population density is a good thing and will help the environment overall

» **Thank you for your comment. The comment is noted.**

Strong support for ADUs!

» **Thank you for your comment. The comment is noted.**

## CAST Architecture

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity through land use planning, and inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation.

» **Thank you for your comment. The comment is noted.**

## Catalano, Gus

Alternative two is the best approach for two reasons:

- No Far Limit
- Aid with predevelopment costs

However Alternative 3 does have MHA requirements that should apply, for a 2nd ADU and that's should be incorporated into Alternative 3.

Additionally the lot coverage rules specially how they are not changed is not good. Neither of the Alternatives attempts to save this. In very small lots <5,000 sq ft, which is a lot of Seattle SFH, the houses already existing cover a significant amount. It would limit the size of ADUs in smaller lots to the point it's not worth it. On my particular lot, I wouldn't be able to build one larger than 300sq ft, that's barely a studio. I think the lot coverage limit should go through one of these changes:

- Increased for smaller lots to Lots less than 5,000 square feet: 1,000 square feet plus 25 percent of lot area

- DADUs in rear yards next to an alley are not subject to lot coverage so long as they are under 800sq ft (or some other number)

This will help increase how many DADUs can actually be built.

» **Thank you for your comment. The comment is noted.**

Alternative 2 and 3 are good, it will keep houses from being torn down while increasing density

» **Thank you for your comment. The comment is noted.**

I disagree with the impacts of displacement/affordability. Since in smaller lots you're not able to build DADUs that are worthwhile (a studio doesn't count) I'm encouraged to demolish my existing house and make a giant one. The new house will be more expensive and makes house prices rise even more. Not to mention the effects on architecture and the neighborhood character.

With the current alternatives only large lots can have DADUs. Basically anything under 65th st in north seattle will not be able to have DADUs, these are small lots by far. You're going to be pushing DADUs to the outskirts of the city where while there is more space, there is less opportunity. Not everyone want's to have an apartment in their home.

Notice that in most of your examples, you either use a 3000 sq ft lot or a 5000 sq ft lot, nothing in between and nothing with a single-floor house which is fairly common.

» **Thank you for your comment.**

Please relax limits for lots between 4,000 and 5,000 sq ft on lot coverage.

» **Please see Chapter 2, Alternatives, for a description of lot coverage requirements. As established in Seattle Municipal Code 23.44.010, the maximum lot coverage does vary by lot size. For lots under 5,000 square feet, the maximum lot coverage allowed for principal and accessory structures is 1,000 square feet plus 15 percent of lot area. The maximum lot coverage for a lot of any size is not proposed to be changed; adding a DADU to 3,200 square foot lot would require that the main house and any other structures on the lot have not already exceeded the maximum lot coverage allowed.**

Both alternatives have downsides that are unavoidable. I suggest you do two things to mitigate the impacts:

- Provide more relaxed limits for green roofs (like the height limit) or for planting trees (that are then protected for x number of years)

- Entice the ADUs to be near high frequency transit areas with lower limits, again these are in parts of seattle that are old and have lots of small lots. The limits that currently exist will push ADUs to places with less opportunity

» **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes additional height for a broader range of green building strategies. In terms of incentivizing ADUs near frequent transit, the objective of the EIS is to increase the number and variety of housing choices in single-family zones throughout the city, including areas near transit.**

I think something that is missing here is encouraging DADUs with garages underneath, while this increases the height, it won't impact parking spaces as much.

» **Thank you for your comment. The comment is noted.**

## Cave, Donn

The approach described in Appendix A does not adequately account for the economic factors associated with the removal of the owner occupancy requirement, in Alternative 2.

If you refer to the previous SEPA appeal decision, see findings of fact item 28 and conclusions item 9, showing that this change exposes a new option for global real estate investment capital, that isn't accounted for in the historical trends that the Appendix A approach relies on for the scale of impact. Whether value analyses are accurate or not, if orders of magnitude more capital is available for only certain outcomes, that seems very likely to affect the results, and no hint of this is to be expected in historical performance, where the owner occupancy requirement has always been in force.

The observation (page 4-13) that lower priced areas may be rising faster in value, spotlights the obvious consequences for this effect, in terms of displacement.

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative, which would eliminate the owner-occupancy requirement, and Section 4.1, Housing and Socioeconomics, which analyzes removal of the owner-occupancy requirement.**

## Chapman, Paul (Member of Welcoming Wallingford)

Remove the parking requirements. These requirements increase the cost of creating housing, making it less affordable. They also restrict the number of parcels where housing can be built. Most importantly, given global climate change, our city should encourage less personal car use rather than more is environmentally prudent. Removing the parking requirements

- » **Thank you for your comment. The comment is noted.**

Allow Permits for AADUs entirely within an existing house under Subject to Field Inspection rules, rather than the full permit process. There is very little difference between finishing a basement with a bathroom and wet bar and constructing an AADU. The full permit process adds thousands of dollars to the cost of an AADU because it demands the services of an architect.

Remove the owner occupancy requirement. While I know there are some concerns over the financialization of housing, even more concerning are the restrictions on rental housing that are created by the owner occupancy requirement. We already allow rentals of entire houses, and of apartment buildings. Requiring owner occupancy in perpetuity means that it is impossible for home owners to downsize while maintaining their property as a rental. To placate opposition, reasonable owner-occupancy requirements would be acceptable, such as requiring that a legitimate owner be resident on the property for a year, including after each sale of the property.

- » **Thank you for your comment. The comment is noted.**

Thank you for your hard work on this Draft EIS!

The ADU DEIS demonstrates that there are no significant impacts to policy changes that make it easier for homeowners to build more housing that integrates well with existing neighborhood development. By creating options for homeowners to build additional housing within the stereotypical characteristics of single-family housing helps

1. Create much needed housing to ameliorate the housing affordability crisis,
2. Without creating adverse impacts to the physical characteristics of single-family zones,

3. While reducing the number of houses torn down and replaced with McMansions because the existing structure can now support more value,

4. And providing homeowners options to withstand cost of living increases by using their property to generate additional income.

I prefer Alternative 2, with certain changes:

1. I prefer that you research allowing 2 AADUs plus a DADU as in Alternative 3. Given that we are not changing lot coverage or materially changing the maximum envelope for the main house, this is a non-impactful way to provide additional family-sized housing in our neighborhoods.

2. I prefer you investigate changing the rules for lot coverage to exclude non-permeable decks higher than three feet from counting against the 35% lot coverage limit. This limit currently prevents additional housing without creating any environmental benefits.

3. I prefer you investigate decreasing the costs for building ADUs by:

3a. Permitting AADUs entirely within an existing house under Subject to Field Inspection rules, rather than the full permit process. There is very little difference between finishing a basement with a bathroom and wet bar and constructing an AADU. The full permit process adds thousands of dollars to the cost of an AADU because it demands the services of an architect.

3b. Reducing/eliminating the cost for sewer hookups for DADUs. The \$15,000+ fee to begin sewer service for a tiny house is prohibitive. As an example, the city and county could explore a rebate system on the fees in return for maintaining the DADU with below market rents.

I agree with the DEIS Alternative 2 conclusions that the following won't have adverse impacts. I encourage you to maintain this in the final EIS and ordinance.

1. Removing parking requirements. These requirements increase the cost of creating housing, making it less affordable. They also restrict the number of parcels where housing can be built. Most importantly, given global climate change, our city should encourage less personal car use rather than more is environmentally prudent. Removing the parking requirements

2. Removing the owner occupancy requirement. While I know there are some concerns over the financialization of housing, even more concerning are the restrictions on rental housing that are created by the owner occupancy requirement. We already allow rentals of entire houses, and of apartment buildings. Requiring owner occupancy in perpetuity means that it is impossible for home owners to downsize while maintaining their property as a rental. To placate opposition, reasonable owner-occupancy requirements would be acceptable, such as requiring that a legitimate owner be resident on the property for a year, including after each sale of the property.

3. No MHA requirements. By allowing 2 AADUs within a structure without any MHA requirements, we can incentivize the creation of low-impact family sized housing by existing homeowners.

- » **Please see Chapter 2, Alternatives, for a description of what is included related to reducing costs and the frequent comment response regarding requests for additional changes to the Land Use Code.**

Reduce/eliminate the cost for sewer hookups for DADUs. The \$15,000+ fee to begin sewer service for a tiny house is prohibitive. As an example, the city and county could explore a rebate system on the fees in return for maintaining the DADU with below market rents.

- » **Capacity charges are levied by King County; the City does not have authority to waive those fees. King County has two studies underway that may lead to changes to the capacity charge, including charges for a new ADU. See [kingcounty.gov/services/environment/wastewater/](http://kingcounty.gov/services/environment/wastewater/)**

[capacity-charge/review-studies.aspx](#) for more information. Please also see the frequent comment response regarding King County Sewage Treatment Capacity Charges.

### Chiachiere, Frank

I wholeheartedly support Alternative 2. As a homeowner, I want to see more options for people of different incomes in my community and my neighborhood.

» **Thank you for your comment. The comment is noted.**

### Childs, Brian

Parking is a huge problem. These structures rarely have or are required to provide parking. The timeline disconnect between public transportation infrastructure and efforts to reduce car ownership make this a real problem. I do not want to see more ADUs in our neighborhood primarily because developers who do not live in the neighborhood are adding more units at a total disregard for the character of those neighborhoods. Existing homeowners bought both a property and a community, and these kinds of units dramatically change the quality of life ... again, because of parking, congestion, and the aesthetic they bring. Please don't allow these units anymore.

» **Thank you for your comment. The comment is noted.**

### Chong, Jessica

My husband and I have been renting in Seattle and are about to close on a house. We have a new baby and my mother is planning to move to Seattle to help take care of our baby (and future kids). She cannot afford to buy her own place given Seattle prices, and there aren't rentals near our future home. We would like to build an ADU or DADU on our future property so that she can live with us. We almost put offers on 5 houses that we had to rule out because the houses just barely did not meet the current, restrictive DADU requirements, even though the properties actually had plenty of lot space overall. For example, some of the lots did not have space for a parking space - which should not be a problem because my mother does not drive a car. Also, many lots had a garage that was ripe for adding a second story to support an apartment upstairs while still allowing a parking space for us, but then we would not have enough square footage left for her living space. The current rules forced us to prolong our house search 6 months more than if we had had more flexibility in building a DADU in the future. During those 6 months, average Seattle housing prices increased by >\$200,000!! We'd love to live in a multigenerational setup while still maintaining our desires for privacy and independent living.

The proposed changes that are most important to us are:

Elimination of the parking requirement for ADUs regardless of number

.Elimination of minimum lot size for ADUs.

Increasing the allowed gross floor area

More allowable rear yard coverage.

.Incremental increases in size and height allowances and options for roof features such as dormers and green roofs.

.Do not apply Mandatory Housing Affordability.

» **Thank you for your comment. The comment is noted.**

### Christensen, Charles

I like option 3. It seems to balance housing and parking needs well.

» **Thank you for your comment. The comment is noted.**

### Christianson, Liane

I support alternative 2 in order to add a Dadu to my home

» **Thank you for your comment. The comment is noted.**

Totally support option 2 and have been waiting for this for a few years now. Thanks for considering it. I hope it passes.

» **Thank you for your comment. The comment is noted.**

Don't see any impact here

» **Thank you for your comment. The comment is noted.**

Having this option will enable me to stay in my house longer as a retired person I will not be able to afford my mortgage without more income and would need to move. I have owned my home since 1986, remodeled it in 2008 and do not want to move.

» **Thank you for your comment. The comment is noted.**

My property is large enough for a another accessory dwelling on the property. It is 1/2 block from bus and a short bus ride to light rail and the Univ of WA

» **Thank you for your comment. The comment is noted.**

Wedgwood is a walking neighborhood and many owners here walk everywhere. Think it would have a very small impact on the neighborhood

» **Thank you for your comment. The comment is noted.**

Am already impacted by people parking here for the bus etc. and I plan on providing parking on the property

» **Thank you for your comment. The comment is noted.**

### Chu, Gerry

I support changing Seattle law to make it easier to build ADUs / DADUs. We need to build more housing. Having ADUs will not significantly change neighborhood character, and neither should neighborhood character be viewed as static.

» **Thank you for your comment. The comment is noted.**

### Clark, Gina, , Master Builders Association '

When done correctly, ADUs and DADUs can have little to no significant impact on the character or aesthetics of a neighborhood community. Design, land use, and aesthetic guidelines that consider backyard coverage limit, bulk, scale, building height, overhangs, roof lines, architectural features, and

landscaping, to name a few, can help blend and integrate ADUs and DADUs into existing buildings. Under the draft EIS, the City of Seattle has determined that both Alternatives #2 and 3 have no significant impact on aesthetics because of the regulations that are currently or will be in place to keep design features flexible to incentive construction while preserving community character. The Master Builders Supports limiting regulations that hand tie design and over regulate, creating barriers to construction, disincentivizing production, and increasing cost.

» **Thank you for your comment. The comment is noted.**

In a time of rising housing costs and decreasing supply, the Master Builders Association supports the City of Seattle's efforts to increase the number and variety of housing choices available in single-family zones by making it easier for property owners to permit and build ADUs. Alternative #2 would result in the construction of 3,300 units over 10-years with no significant impacts to utilities, schools, or EMS. While overall citywide and regional affordability will remain a concern, the addition of 3,300 units adds to housing supply, reducing pressure in many ways including entry level housing, the "missing middle" and for those wishing to age in place. Alternative #2 also allows for a maximum square foot of 1000 without significant additional regulations, including FAR or off-site parking, keeping footprint and design flexible, design flexible, not impacting FAR calculations on the main home, and not requiring owner occupancy of the ADU or main home. Anything that can be done to reduce regulatory cost on production will help to reduce the cost on renters and owners. This provides incentive to construct, as well as design and building flexibility on the lot to enhance integration of the building into the lot and character of the neighborhood, taking into account height, setbacks, and other surrounding aesthetics. Maintaining regulation that balances environment, smart growth, and a healthy housing supply to reduce cost can be maintained with early, open, and frequent communication with all deeply engaged stakeholders in the home construction process. The Master Builders Association stands ready to work closely with the City of Seattle to work on these tough issues to further reduce regulatory barriers while protecting the environment, community character, increasing housing supply, and reducing cost.

» **Thank you for your comment. The comment is noted.**

Alternative 2 will allow for the construction of 3,300 units and provide additional housing choices with a range of size, location and alternative housing options at price points that do readily exist. Alternative #2 will also result in less tear downs than Alternative #1, and about the same as Alternative #3, preserving existing housing in communities, community character, and hopefully resulting in less gentrification. Construction of ADUs will be broadly scattered throughout the city in neighborhoods of varying socioeconomic differences, each with unique demographics and current and future needs. Some have a need for more student housing, some a need to fill gaps for more senior housing, others a need for more workforce housing. But all have a need for more accessible and attainable housing at price points that are currently difficult to find within (or outside) the city. By building ADUs, the desire is to take the pressure off other types of units to open those markets to other renters and buyers who can afford that product. The Master Builders supports this shift in market pricing without tearing down current units or broadly gentrifying neighborhoods.

» **Thank you for your comment. The comment is noted.**

While 3,300 units over 10 years can and will help increase housing supply and attainability for certain sectors of the population, the units will be spread out over the city, and likely not densely centered in a particular neighborhood or community. It would provide housing for 2,160 more residents over a 10-year period which would be a minor, at best, increase. If ADU or DADU production does happen to center in a particular community or neighborhood, density or production can be offset by limiting the maximum number of people per ADU, and design standards and regulations that remain flexible to maintain community character within the footprint of the project. The Master Builders also supports increased density that is consistent with updates to the city's Comprehensive Plan and HALA's recommendations to provide for and increase the type of accessibility to housing within the city. With limited buildable

land in production within the city limits, it is paramount that the city maximize the current land available within the Urban Growth Area to meet density targets, maximize investment in infrastructure including transit, and create jobs/housing balance that brings equitable investment to all communities while producing housing at all price points in production.

» **Thank you for your comment. The comment is noted.**

Thank you for the opportunity to comment on the Draft EIS.

» **Thank you for your comment. The comment is noted.**

Although the draft EIS determined the addition of ADUs and DADUs would not have a significant impact on off-street parking, it was acknowledged, and the Master Builders agrees, there is the potential for adverse impacts on particular blocks within certain areas as production of ADUs and DADUs commences. While on-site and off-site parking requirements can add a significant and at times costly regulatory burden to developers and builders, it can also be a significant issue for neighborhoods already struggling with challenging off-street parking realities. In addition, incentives for the construction of on-site parking is often necessary to accommodate the reality of the need for some individuals or families to own a car (single-moms who shuttle children, those with inflexible work schedules, those who must work more than one job not within the city, those not within a 1/2 mile of bus service). While the Master Builders does not disagree with the analysis conducted by the City, the reality could be that the parking and transportation debate is not over as ADUs and DADUs are constructed and full community buy-in is needed on a project-by-project basis. The Master Builders urges the City to remain open about the possibility of parking incentives and flexibility in the future as projects are constructed, and neighbors comment about the need for additional parking as ADU and DADU production begins.

» **Thank you for your comment. The comment is noted.**

The City of Seattle has determine no significant impacts the level of service for sewer, water, utilities, schools or EMS. The Master Builders Association would tend to agree the construction of ADUs and DADUs under either Alternative #2 or 3 would be widespread throughout the city and over a 10-year period, resulting in little to no significant impact to these services.

» **Thank you for your comment. The comment is noted.**

## Clark, Judy

Parking availability is already a crisis. We have already exceeded the availability of street parking in our neighborhood of Capitol Hill, as well as at our son's house on Beacon Hill, while public transportation does not appear to be keeping up with the demand. I believe that any building, DADU, ADU, apartment or condo should include off street parking.

» **Please see the frequent comment response discussion parking impacts.**

It is time to change the land use code for DADUs and ADUs! For those of us who want to build a new unit, the price of building keeps increasing, while the city prevents the addition of new rental units in a housing crisis by deferring the vote.

The lack of changes in the land use code encourages more illegal units. It is better to have reasonable rules, safe units and more fees for Seattle with a change in the land use code

» **Thank you for your comment. The comment is noted.**

Alternative #2 is best for our neighborhood with the 2 exceptions: There should be a parking requirement of 1 parking space/ unit as in alternative #3, and the owner should be on premises part of the year for

accountability purposes. I found the FAR limit confusing, and the present lot coverage limit is sufficient. Present maximum gross floor area limits are highly restrictive, and the proposed 1000 square foot limit for DADUs, excluding garage and storage areas, is essential.

» **Thank you for your comment. The comment is noted.**

The addition of more AAUs and DADUs would keep more owners in their homes and fewer apartments in the neighborhoods. This land use code change is a win-win for Seattle residents.

» **Thank you for your comment. The comment is noted.**

## Collins, Drew

I think that there are flaws in all alternatives, but that the city should choose the policy that allows the greatest number of ADUs to be built and with the least restrictions on owner-occupancy or parking.

» **Thank you for your comment. The comment is noted.**

I would like to be able to afford a house and ADU legislation should help housing affordability. I would gladly live in an ADU.

» **Thank you for your comment. The comment is noted.**

We have a housing crisis.

» **Thank you for your comment. The comment is noted.**

We have a housing crisis.

» **Thank you for your comment. The comment is noted.**

We have a housing crisis. Single family zoning is racist.

» **Thank you for your comment. The comment is noted.**

Ignore parking.

» **Thank you for your comment. The comment is noted.**

## Connolley, Melissa

We NEED less parking to keep people out of traffic, we should be limiting parking and forcing our public to utilize community based transit, walking or riding. I support Alternative 2.

» **Thank you for your comment. The comment is noted.**

Alternative 2 meets most of the needs in our city; invites housing and use of public transportation.

» **Thank you for your comment. The comment is noted.**

Neighborhoods are essential to calling a city HOME, to keep the nature of the neighborhoods, ADU's are a good use.

» **Thank you for your comment. The comment is noted.**

We NEED more neighborhood alternatives to take out homes and putting in box style apartments, this ADU's provide for maintaining HOME/NEIGHBORHOOD while increasing housing. Alternative 2 still preferred.

» **Thank you for your comment. The comment is noted.**

Alternative 2 does limit parking needs, this is GOOD, we need to get people out of cars and utilizing public transportation.

» **Thank you for your comment. The comment is noted.**

Still on Alternative 2 - so many older resident could use the added income of renting out an accessory dwelling in order to maintain their home in Seattle.

» **Thank you for your comment. The comment is noted.**

### Crosser, Nicholas

If Owner occupancy requirement remains I will be forced to stop offering ADU as an affordable housing option. Owner Occupancy requirement of ADU's is unjust, not required of other rental housing sectors and should stop immediately. This requirement hurts middle class families trying to keep their house.

» **Thank you for your comment. The comment is noted.**

Unfortunate that removal of owner occupancy requirement is only under Alternative 2 and not 3. If Owner Occupancy mandate remains I will have to get rid of my ADU decreasing an affordable housing option. Removal of owner occupancy requirement allows me to keep my house that I worked so hard for if I need to move due to work but ever hope of coming back to the home that I own one day. Keeping the owner occupancy requirement places an undue burden on a middle class family like mine just trying to keep their own house. It makes no sense that currently I have to live on the property of the ADU but I can by all means own several other rental properties in Seattle and not have to live there. Living on the property has not been proven to make for a better landlord. It is not a requirement for landlords to live on the property for other types of rentals and ADU's should be absolutely no different. It is just wrong to continue to force this upon owners trying to increase affordable living options in Seattle and the owner occupancy requirement must cease. Otherwise, I will be forced to either sell my own home or get rid of my ADU which has provided a good option of affordable living.

» **Thank you for your comment. The comment is noted.**

### Cruikshank, Bill

More and more people are relying on alternative modes of transportation. Seattle is also the only major city in the US that is seeing an increase in public transportation ridership. Car sharing and bike sharing are become a more seamless part of our city. Alternative 2 allows for more aggressive densification without the need for additional parking. Requiring additional parking isn't necessary and will get in the way of ADUs being built. Alternative 2 will allow people to develop ADUs more effortlessly. Please pursue Alternative 2

» **Thank you for your comment. The comment is noted.**

Alternative 2 will help increase density in areas that are traditionally low density. Too high of a percentage of SFH exist near Seattle's urban zones

» **Thank you for your comment. The comment is noted.**

In many cases it is hard to notice ADUs. They are way more aesthetically pleasing than the huge new SFH developments seen in our neighborhoods. Alternative 2 will reduce the chance a SFH will be torn down.

» **Thank you for your comment. The comment is noted.**

No impact to public services or utilities is predicted. Please pursue Alternative 2 for increased housing supply.

» **Thank you for your comment. The comment is noted.**

Please pursue Alternative 2 for increased overall ADU and lower percentage of tear-downs

» **Thank you for your comment. The comment is noted.**

Please pursue Alternative 2 for the increase in housing supply that will result from additional ADUs. I'm a young adult and stress about my ability to buy a home for the first time. Relaxed ADU laws would help me with alternative living options

» **Thank you for your comment. The comment is noted.**

## Culver, Aleksandra

Please support the most flexible options for increasing the number of new Accessory Dwelling Units.

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity through land use planning, and inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allowed by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Darsie, Jean

DADUs in proportion to existing buildings should be the goal. We don't need more McMansions that change the look and feel of a neighborhood.

- » **Thank you for your comment. The comment is noted.**

Yes, do make the Land Use Code changes that would reduce barriers to the creation of ADUs.

- » **Thank you for your comment. The comment is noted.**

Keep the requirement that the property owner live there for some time. We want to avoid creation of AirBnBs which would be counter to the goal of making more affordable housing available to more Seattle residents.

- » **Thank you for your comment. The comment is noted.**

DADUs in proportion to existing buildings should be the goal. We don't need more McMansions that change the look and feel of a neighborhood.

- » **Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes an FAR limit for single-family homes that will reduce the maximum size allowed for new construction.**

Perhaps with a few more people living in my neighborhood, Metro will see fit to restore our service. They left us stranded (I'm a senior citizen) with no bus services because we didn't have enough people riding the bus.

» **Thank you for your comment. The comment is noted.**

Some sidewalks would be helpful but I don't think those are part of this proposal.

» **Thank you for your comment. The comment is noted.**

## Davis, Cody

I find it ridiculous that you will allow essentially 3 units with 8 people on a lot size so small.

» **To clarify, current regulations allow any number of related people or up to eight unrelated people to live on a lot in a single-family zone, including occupants of an AADU or DADU. The Draft EIS studied the option of increasing this to a total of 12 people on the entire lot.**

I do not want my single family neighborhood re zoned.

» **Thank you for your comment. The comment is noted.**

Do not upzone our single family neighborhoods.

» **Thank you for your comment. The comment is noted.**

I love the current aesthetic of the single family home neighborhoods. It is what makes Seattle unique. Ballard is aesthetically unpleasant because of all the young homes. Any up zoning will ruin the neighborhood.

» **Thank you for your comment. The comment is noted.**

Schools, busses, roads and other forms of public transportation are already crowded. Our infrastructure cannot support any upzoning.

» **Thank you for your comment. The comment is noted.**

This is a terrible idea. This would have several negative impacts on the quality of life me and my neighbor's enjoy. Regardless of what you believe, contractors will buy the property, not give a shit about quality or the people around them and they will ruin our single family home neighborhoods.

» **Thank you for your comment. The comment is noted.**

Allowing zero parking spaces for 8 people is an absolute joke. Probably the dumbest portion of this whole proposal. Classic Seattle government engineering congestion.

» **Thank you for your comment. The comment is noted.**

## DeLucas, Karen

I am writing in support of the findings of the ADU Draft EIS (DEIS) published May 10, 2018. I particularly want to praise the city for the historical context that was written in Chapter 3. In order to move forward, we need to learn from our past wrongs so we do not repeat them or perpetuate them in the future. So thank you for including this here.

While I support the elimination of the owner occupancy requirement, I would recommend more in-depth study of the effects this may have. It appears to be the most contested amendment and a stronger case may need to be documented.

I am curious, too, at whether it is possible to study the effects of inaction. "Seattle 7th most costly place to build worldwide", <http://www.djc.com/news/co/12111485.html> Homeowners will still have a financial challenge to build these units. The longer this process is drawn out, the more expensive it will be. House sale prices are of course a part of this, too.

What is the environmental impact of our large population of homeless we are seeing on our streets and setting up camps in available open space. Not that ADUs will be the magic solution, but it is one tool in the toolbox for increasing housing options and spreading out the impact of growth throughout our city.

To be clear, I fully support all the options listed in Alternate 2. I have concerns about the MHA requirements in Alternate 3. If the goal is to build more, adding to the cost burden is not the way to do it.

An added FAR suggested in Alternate 3, needs further study and bonuses could be used to incentivize ADU construction. I would encourage the flexibility of the location of ADUs and DADUs on various sites. The way it is currently written it would encourage basement ADUs which have their own cost challenges and aesthetic issues. Many basements are not easily accessed and therefore are more challenging for elders and people with disabilities. In my own home, I designed a street facing, ground level ADU, that also has a direct access to the main house for when my parents are with us, but also can be locked when there are renters. The main house is located more towards the back of the property.

I have neighbors who live in a big box 3300 SF house that I know wasn't designed for the 3 generations that are living in it. All 4 bedrooms are on the upper floor. If the builders had had an incentive to design differently, it might have had more flexibility for changing demographics. While I like the idea of FAR and FAR bonus' for ADUs, I prefer the flexibility of not limiting the location.

Most lots in Seattle come with their own unique challenges. As an architect, I first have to help my clients with understanding all of restraints imposed on each including zoning, building code, costs, and potential site issues. When drafting the new code, I encourage maximum flexibility so that we can design and build more ADUs.

Thank you,

Karen DeLucas

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code and the response regarding the positive impacts of the proposal. Please also see the response to the form letter included in Section 5.5. Finally, please see Section 4.1, Housing and Socioeconomics, and Appendix A for additional discussion of removal of the owner-occupancy requirement.**

## Deutsch, Rebecca, 350 Seattle

I support eliminating all off-street parking requirements for ADUs. Eliminating this requirement would make it possible for our backyard space to accommodate an ADU/DADU and would make a difference in our ability to proceed with building an ADU.

Also, I already park on the street, and I acknowledge that the increased density from more ADUs may make on-street parking a little harder. I fully accept that tradeoff in order to prioritize our space for housing people and creating dense, diverse neighborhoods. We can't privilege space for cars over housing for people - housing is a human right, parking is not.

Fundamentally, giving so much free space to cars means that we're building less housing, having fewer sidewalks and bike lanes, and "of course" encouraging the use of fossil fuels that are devastating the climate. It's time to start thinking about how we move people, not cars.

» **Thank you for your comment. The comment is noted.**

I'm writing in support of removing regulatory barriers around ADUs to encourage more affordable, and low-carbon, housing options.

I want Seattle to be affordable, and households living in dense, transit-rich cities typically generate ¼ to ½ the climate-destroying CO2 of those displaced to the suburbs. The EIS needs to cover the impacts to climate change and carbon emissions, and in particular how the no-action alternative 1 continues on our path of displacement and people moving further away, thus increasing longer commutes and carbon-heavy lifestyles.

Neither of the existing "alternatives" maximizes the benefits and flexibility, though Alternative 2 is a good start. In particular, I support a "preferred alternative" proposal that combines elements of Alternative 2 and 3 to maximize flexibility and prioritize policies that \*actively encourage\* affordable and green ADUs being built.

Further, my partner and I are considering building a ADU (or DADU) in our backyard, with the desire to create more affordable housing in North Capitol Hill and generate supplemental income. But, we have been daunted so far by the requirements and overhead planning/permitting costs. Reducing regulations to allow for more flexible ADU building would help us make this goal happen.

However, all changes I'm advocating for come with the caveat that I'd only support including them if they wouldn't trigger another round of EIS (we can't afford the delay).

» **Thank you for your comment. The comment is noted.**

We need much, much more affordable housing and more dense neighborhoods, to address the interlinked homelessness /housing crisis and the climate crisis. ADUs have the potential to significantly increase housing supply in close-to-city-center neighborhoods, especially adding smaller, more affordable units among larger single family houses in the least dense neighborhoods.

The EIS needs to cover the potentially large benefits to reducing emissions and getting us on track for the city's Climate Action Plan goals from more mixed-mode and denser, affordable housing options within our single-family-neighborhoods. We need ADUs to stop involuntary displacement to the suburbs, where people have much larger carbon footprints. This is an essential part of an analysis of environmental impact. Please cover the climate as part of our essential environment.

» **Please see the frequent comment response concerning the proposal's effects on climate change.**

I support the final "preferred alternative" option incorporating the following changes. However, all changes I'm advocating for come with the caveat that I'd only support including them if they wouldn't trigger another round of EIS (we can't afford the delay).

1) Lessen property line setback requirements for ADUs (or possibly allow it as an incentive for ADUs that agree to make it affordable and/or built green). This would particularly help our situation, giving greater flexibility to site an ADU in our backyard while preserving a few majestic old, evergreen trees. If we could site the ADU a few feet closer to the property line, this would keep the ADU further from the trees' root lines.

2) Remove the owner-occupancy requirement. It discriminates against renters and disincentivizes building ADUs. While we have all intention of staying as owner-occupiers in our main house in the foreseeable future, it has given us pause in considering building an ADU incase our life/job situation

changes in the future. We don't want an ADU to potentially block us from later moving out and renting our main house. Additionally, why shouldn't existing rental houses also be able to add ADUs?

3) Incentivize affordable rentals by eliminating development charges and MHA fees when owners commit to holding them as rentals affordable to people making under 60% AMI for 15 years and/or when homeowners commit to longer-term rentals for at least 10 years (e.g. not AirBnB units). In our case, we would definitely agree to that deal, as we want to increase the affordable housing available in the city, and the lower overhead costs would make it more feasible for us to build an ADU.

4) Streamline permitting as much as possible. With just three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots or green roofs, residents who want to build an ADU have a clear and predictable pathway through permitting.

5) Lower the minimum square footage for lots that can support DADU's and ADU's to 2500. A 2500 sq. ft. lot can easily support a 2-story house with a footprint of 800 sq. ft. and an ADU inside, and also a DADU with a 400 sq. foot footprint. While in our case of a 5000 sqft lot, we would still be able to build an ADU, I support all efforts to encourage more people to build more units.

6) Allow 2 ADUs plus 1 DADU. We should encourage the subdivision of existing large houses, especially for empty-nesters, and we want flexibility for more units. If someone has divorced or their kids have left home and they have space for a DADU and also a large house, it's good for everyone if they can do 2 ADU's as well as the DADU: it creates more affordable units, and allows people to stay in their own homes when circumstances change.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Dimond, Al

I strongly support an increase in housing capacity and options. Alternative 2, with no requirement for expensive/space-consuming/disruptive off-street parking, and removing the owner-occupancy requirement, is a good step in the right direction.

» **Thank you for your comment. The comment is noted.**

Some of the best-looking side streets in Seattle are full of duplexes, triplexes, and small apartment buildings. Unfortunately they're often on the periphery of major highways.

» **Thank you for your comment. The comment is noted.**

This study generally seems to support the idea that more ADU production, especially in more expensive areas, should be a boon for affordability and opportunity.

» **Thank you for your comment. The comment is noted.**

Particularly on the fringes of urban villages I welcome changes to the character of existing development. We have lots of places walkable to frequent transit and practical retail that could add a lot of people, reinforcing these healthy qualities of urban life, with few plausible negative impacts.

» **Thank you for your comment. The comment is noted.**

Since you'll probably get lots of complaints about parking availability, I want to counter that: I don't think parking availability should be a policy objective. On the public streets, car parking is the lowest-priority

use of space. Off-street, any increase to the number of cars is counterproductive, adding to pollution and congestion. "And I vote," as the saying goes... not for the car-coddling candidates!

» **Thank you for your comment. The comment is noted.**

## Dodd, Bayley

Please don't increase the required street parking. We need safer streets for cyclists, pedestrians, and buses. We don't need to accommodate for more cars!

» **Thank you for your comment. The comment is noted.**

Please remove all barriers to increase the amount of ADUs!

» **Thank you for your comment. The comment is noted.**

Let's increase density!

» **Thank you for your comment. The comment is noted.**

Please make it possible to increase density. We need more affordable units- apartments, townhomes, fourplexes, etc. I'm a married young professional who dreams of buying a home and even though I make good money with my husband, we couldn't afford a single family home. But we could afford a townhome or a condo. Please create more townhomes!

» **Thank you for your comment. The comment is noted.**

## Dodson, Bret

I support Alternative 2. Parking should not be required. Owner's should not be required to live in any unit.

» **Thank you for your comment. The comment is noted.**

I support Alternative 2.

» **Thank you for your comment. The comment is noted.**

We also need to increase the area in the city that is zoned for multi-family housing.

» **Thank you for your comment. The comment is noted.**

I support Alternative 2. More protected bike lanes!

» **Thank you for your comment. The comment is noted.**

## Duggan, Phillip

My name is Phillip Duggan.

My household is made up of Phillip and Terra Duggan and regular family and friends as guests and occasional roommates.

I live in District 5 in the Pinehurst Neighborhood.

I want more housing because because it's the only way we can be a welcoming city. I've got mine doesn't mean others shouldn't have theirs. More personally, I want a city where my father doesn't have to move

away in order to retire. He's going to sell his house on Queen Anne but I would like him to stay in the area and even smaller houses in our neighborhood are getting too expensive for him. I would also love for my future kid to be able to live nearby but that also won't be possible unless they pick a narrow range of careers.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allowed by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12 or more.
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.
10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## eliason, michael

My name is Mike Eliason. I am a father, husband of two, social housing advocate and safe streets activist. I live in Fremont, we own a car but rarely use it. We utilize transit and cargo bikes to get around. I want more housing because we have zero security of tenure long term and we are effectively priced out of Seattle because of the nearly city-wide ban on multifamily housing. Removing onerous and moronic restrictions to ADUs and DADUs won't solve our housing crisis but it is a step in the right direction. If a family like ours - union job, middle class, two kids in public school can't afford to live here, what does that say about those who are less fortunate than us? We need to open up neighborhoods to more households - especially ones that have seen declining or relatively flat population growth since the 1970s. We need more housing in the city, more transit-oriented housing regionwide - to address our housing and climate crises.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8. Support raising maximum household size, total number of residents on site to 12 - we could easily support a cooperative of 3-family sized households on a typical 5000 sf lot - and this would allow more low-income and non-market housing in single family zones. The city looked at doing this in the late 70s, but ultimately relented to anti-housing homeowners.

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

With a federal government that is attempting to build walls to close off our country - we don't need cities closing off entire neighborhoods from those who aren't wealthy. Our exclusionary zoning is the byproduct of a segregationist ([link: http://www.sightline.org/2018/05/23/this-is-how-you-slow-walk-into-a-housing-shortage/](http://www.sightline.org/2018/05/23/this-is-how-you-slow-walk-into-a-housing-shortage/)) and before the first zoning ordinance, multifamily housing was legal everywhere in Seattle. Today, it is illegal in nearly 90% of the entire city. It is long time we reversed these classist land use policies and made for a more welcoming, more equitable, more sustainable, and more livable city.

Regards,

Mike Eliason,

Fremont renter, dad, husband.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

remove all parking requirements for ADUs and backyard cottages.

» **Thank you for your comment. The comment is noted.**

### Engelson, Andrew

I support eliminating the requirement of off-street parking for ADUs. I have a family of four and we don't own a car. We get by on transit & car sharing, and the city is improving more and more each year in making transit a more viable option for getting around the city. If we're going to have an affordable city,

it needs to be dense and with robust transit system of buses, light rail, bike lanes, walking routes, and car-sharing.

» **Thank you for your comment. The comment is noted.**

I own a lot with a substantial backyard and am considering building an ADU, and Alternative 2 or 3 would make that easier (since my home was built in 1922 and has no off-street parking). Building more ADUs could make it easier for young people like my daughters or retired people to afford to live in Seattle.

» **Thank you for your comment. The comment is noted.**

I support increasing density in the city and changing zoning laws to allow many more apartment buildings to be built to meet demand for housing.

» **Thank you for your comment. The comment is noted.**

I support the plan that would allow for the creation of the most ADUs and DADUs, to I support Alternative 3. I believe the city should go farther reducing parking requirements, and not require parking set aside, even if 2 ADUs or 1 ADU & DADU are built.

» **Thank you for your comment. The comment is noted.**

We're in an affordability crisis in Seattle. I believe the priority should be building housing, not worrying about the fine points of aesthetics.

» **Thank you for your comment. The comment is noted.**

## Enns, Lisa

Support alternative 2, no off-street parking requirements

» **Thank you for your comment. The comment is noted.**

Generally, I support Alternative 2, which seems to allow greater densities and fewer restrictions. As half of a dual income, no kids couple, we can't even afford to buy a condo in our desired neighborhood. Partnering with a family who wants to build a ADU or DADU is really the only way we can afford to move out of our tiny one bedroom apartment and gain a small yard if we want to stay in the neighborhood we've lived in for 10 years. Seattle needs to grow and add "missing middle" housing, such as ADU/DADUs, rowhouses, duplexes, and small apartment buildings in SFR neighborhoods. Thank you for attempting to make it easier to add density.

» **Thank you for your comment. The comment is noted.**

## Etheredge, Nick

Alternative 2 (the most aggressive change) is great! Removing owner occupancy requirement is crucial to maximizing number of ADU's, and removing parking is also really important. Please pursue this option. We need as many new homes in single family zones as possible to accommodate more middle class families!

» **Thank you for your comment. The comment is noted.**

## Evans, Elise

I would like to see improved pedestrian networks, protected bike lanes (specifically, as opposed to other bike infrastructure), and comprehensive public transit routes, hopefully reducing need for parking in urban spaces.

» **Thank you for your comment. The comment is noted.**

I am in support of Alternative 2 or Alternative 3, whichever may allow more than one ADU and the most added numbers of housed people in a space.

» **Thank you for your comment. The comment is noted.**

I think that while aesthetics are worth considering, as buildings in a community where people live would ideally be beautiful, that this is the least of my concern when it comes to pursuing more options for housing in a dense city.

» **Thank you for your comment. The comment is noted.**

There is clearly a disproportionate housing cost burden on people from racial and ethnic minorities. Seattle has a history of housing discrimination policy against racial and ethnic minorities, and revising current policy to allow for ADUs would be a step in the right direction to make all neighborhoods accessible to people who have families that were unable to build equity in a house due to that housing discrimination. The government needs to support policy that minimizes displacement of historically marginalized groups.

» **Thank you for your comment. The comment is noted.**

That was (all of this is) a lot of information to take in for public comment purposes. I appreciate how well-researched this is, but it's hard for me to make concise comments with limited time with all this information!

I think it's important to make sure shorelines are cared for and canopy of trees is maintained in a city, for our health. If ADU's are added that decrease canopy or add to runoff, I hope owners will be responsible for mitigating those effects.

» **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

## Ewing & Clark, Inc.,

I am upset to hear the City is thinking that single family areas should become another place to cram in as many people into the City as possible. The City is not thinking about the many people that have lived in this City for years and made Seattle what it is today. More density means less area for the animals that live in the City, less plant life from the development of added structures. More cars, pollution and untreated water runoff. Stop this massive rezoning that will turn us into an overcrowded smog laden City. Thank you.

» **Thank you for your comment. The comment is noted.**

## Fessel, Andy

Homeowners should be able to downscale to a DADU lifestyle and comfortably age in place. To deny these older residents (you have to be older with more financial holdings to be able to afford property

in Seattle) the right to park in their homes (have a garage), have a minimum of 1000 SF allowing 2 bedrooms and 2 baths, and to NOT include storage areas (above or below ground) denies them their federally guaranteed right to occupy and use their property to fulfill their lifestyle needs.

» **Thank you for your comment. The comment is noted.**

Home owners should not be selectively required to have on-site parking, while many of their traditional neighbors do not. Regulations must apply evenly to all homeowners, or to none.

» **Thank you for your comment. The comment is noted.**

Cities are not made up of single-family homes. That is the Seattle of yesteryear, when trees were plentiful and jobs were in shipping and transportation. Seattle is now a technology driven city - and as the downtown landscape has changed so must the residential structure and design.

» **Thank you for your comment. The comment is noted.**

Family sizes have dropped dramatically - from the average of 5 or more to a family size to a level closer to 3 or 4. The presence of DADUs will allow for more families and young children who will keep the neighborhoods vibrant, schools fully utilized, and usage of mass transit.

» **Thank you for your comment. The comment is noted.**

Seattle faces the threat of continued developer destruction of the fabric of old neighborhoods and the construction of new square box houses - built for maximum square footage at the least possible cost. DADU's would allow for existing home owners to realize some rental from their property - and thus afford to continue living in the neighborhood.

» **Thank you for your comment. The comment is noted.**

The additional of small additional dwellings to a residential schema can take the pressure off the housing crisis, and avoid more of the "cubbyhole" apartment buildings that are springing up all over lower Queen Anne and the Interbay sector.

» **Thank you for your comment. The comment is noted.**

The future of Seattle depends the presence of strong family relationships and multiple generations. It is in risk of being a place only for the old , who continue to live in the homes they bought years ago - and the wealthy young - who can afford the exceptionally high housing prices. DADU's allow an additional and more affordable housing option for young families and multi-generational housing accommodations.

» **Thank you for your comment. The comment is noted.**

## Fessel, Melissa

Owners should not have to live on-site.

» **Thank you for your comment. The comment is noted.**

The DADU size should increase in size to 1000 sq feet - not including the garage.

» **Thank you for your comment. The comment is noted.**

I live in a house in upper Queen Anne with my husband and we are expecting children. I would like to be able to have my parents live in a DADU on our lot, and increasing the size of DADUs to 1000 Sq feet makes this feasible.

» **Thank you for your comment. The comment is noted.**

Larger DADU size would allow for more families to live in family zones at an affordable cost.

» **Thank you for your comment. The comment is noted.**

Required parking space takes away from the green space in the lot.

» **Thank you for your comment. The comment is noted.**

### Fields, Shalon

The homeowner that is building the ADU should have to provide 1 off street parking space per unit. If there is not enough land to do that then they should not be allowed to build the ADU.

» **Thank you for your comment. The comment is noted.**

I agree we should allow ADUs, however, additional parking should be made mandatory for Alternative 2 as it is in Alternative 3. I support Alternative 2 with additional parking made mandatory.

» **Thank you for your comment. The comment is noted.**

### Fies, Michael

The no change alternative is the only realistic way to preserve the parking availability current now, which is under stress anyway.

» **Thank you for your comment. The comment is noted.**

Imagine your next door neighbor's building becomes a high-density zoned structure that blocks your views and the sun-light which you have always had and enjoyed. Imagine the destruction to your enjoyment of your property and that of all the others in your neighborhood. Once gone, the character of the street and your housing is forever gone, replaced by more noise, crowding, and stress.

» **Thank you for your comment. The comment is noted.**

It seems like the real-estate economics cited for single-family zones, in which higher density building is encouraged, is certainly beneficial for the construction industry and builders especially. I am opposed to higher-density zoning. I have seen New Jersey up close do not wish to see the same thing happen here.

» **Thank you for your comment. The comment is noted.**

I think the No Action Alternative is the preferable choice. Streets are already full of cars, further crowding is undesirable, resulting in serious degradation of quality of life. Building density increases without concomitant parking spaces for residents of the new buildings has already caused unsurprising problems of cars jamming residential streets at night.

» **Thank you for your comment. The comment is noted.**

The ADU and DADU proposals might benefit builders, but property owners will in the main be disadvantaged. And not just for a short term. I am opposed to the city-plan of such ghettoization.

» **Thank you for your comment. The comment is noted.**

The impacts of the proposed changes were presented as single impacts, and not apparently judged in their totality. But the impacts would be city-wide and negative for all the residents. And they would be negative for just about all residents.

» **Please see the frequent comment response regarding individual neighborhood review.**

Utilities services in my neighborhood were improved in the last few years after failing to provide reliable electricity. We used to experience black-outs more often than one would expect in a modern city. But that is we hope a thing of the past. Having to provide for higher density demands suddenly can only be regarded with a skeptical eye, given the circumstances.

» **Thank you for your comment. The comment is noted.**

Street parking in many parts of town is difficult, sometimes not available during the daytime at all. No change has these problems now. Imagine what the other alternatives will do to compound it into no-solution misery.

» **Please see the frequent comment response concerning impacts to parking.**

Electrical power where I live was dicey until an upgrade was installed a few years ago. Intensifying a great power need with increased population density does not bode well for reliable service. No change does not assure reliability, but the other alternatives will put more demands on a system that to me would become questionable as to reliability.

» **Thank you for your comment. The comment is noted.**

No change is preferable for reasons cited above.

» **Thank you for your comment. The comment is noted.**

No change is preferable to degrading real-estate economics for existing home owners with the other alternatives. Degradation by creating high density conditions would be permanent. It is really a grotesque concept.

» **Thank you for your comment. The comment is noted.**

No change is preferable. The increase of population density proposed in the alternatives will degrade existing living conditions and create unsolvable parking problems. To create deliberately unsolvable problems is not good for Seattle; why do it? It would be dereliction of duty to proceed with such harm.

» **Thank you for your comment. The comment is noted.**

Why create ugliness where beauty resides? No change is preferable to having continuing crowding, unmanageable parking problems, loss of privacy, and all the problems of noise that come with high density.

» **Thank you for your comment. The comment is noted.**

Instead of the City Council imposing top-down regulations, I think that such weighty matters should be put to a vote so all citizens of Seattle can judge for themselves. Few matters could have more consequence for us than these unwelcome high-density proposals.

» **Thank you for your comment. The comment is noted.**

## Fitzgerald, Jac

Choose Alternative 2, but don't bother specifying "1 AADU and 1 DADU", just say "2 ADUs"

» **Thank you for your comment. The comment is noted.**

I'm a homeowner in Capitol Hill, with 2 adults in a 1200sqft condo. I believe that we need to build more housing, and make the city a more dense, transit-oriented place in order to maintain any form of social equality and enable people to live in the city of Seattle without a job as a programmer. I believe that loosening ADU restrictions are a good first step towards a more reasonable city zoning policy to encourage this outcome. I also support the advocacy of various groups that have been helping push for increased density around Seattle.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Why doesn't this chapter address the existence of multi-family dwellings in single-family zoned areas, from back when zoning was more reasonable?

- » **Please see Chapter 3, History and Planning Context, for a discussion of the history of zoning in the study area.**

## Flannery, Eliot

(1) If Seattle isn't willing to rezone large amounts of single family zoned lots the city's housing affordability crisis will only get worse. Limits on number of unrelated people living in a single family zoned lot serves no purpose other than to make housing more expensive. (2) Parking requirements are downright offensive in a city with thousands of homeless citizens. We need to build more homes for people not for cars!

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see Chapter 2, Alternatives, for a discussion of the Preferred Alternative that removes the off-street parking requirement for ADUs.**

Seattle residents do not have any fundamental or even legislated right to own a car. An automobile is a privilege. Seattle should charge much higher fees for residential parking zone permits and use the money to build affordable housing accessible by mass transit. Low income residents already receive discounts for RPZ permits. High income residents should pay more for RPZ permits to subsidize housing for the low income residents.

- » **The proposal evaluated in the EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to the Restricted Parking Zone (RPZ) program are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

Thousands of homeless citizens forced to camp on the street will affect single family zoned lots' aesthetics vastly more than any ADUs will. Serious compromise is required to address the housing affordability crisis. The time and money spent on this aesthetics study was a waste of resources done to appease NIMBY voters who were never going to be satisfied with the conclusions of the report in the first place.

- » **Thank you for your comment. The comment is noted.**

## Fleming, Andrew

Please support the most flexible options for increasing the number of new Accessory Dwelling Units.

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity through land use planning, and inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

### Fletcher, Kathryn

I support getting rid of the offstreet parking requirement. I live in the CD and we have room for at least 2-3 cars per house and most of us have one or no cars and have plenty of space on the street.

- » **Thank you for your comment. The comment is noted.**

I have been following this issue for several years waiting for loosening regulations. The things that have been prohibitive for us building DADU are off- street parking regulations, owner occupancy (though we would be living in house foreseeable future but wonder about future sale issues), and general costs of development. I like the idea of some streamline design options and reduced sewer hook up fees along with reduced development fees for those who will rent at reduced rate. There is no time to waste as this process has gone on a long time already.

- » **Thank you for your comment. The comment is noted.**

### Fliss, Tim

Single family zones in Seattle have more than enough parking. In a city with an affordability crisis, this should be the least concern. Transit and biking improvements are the right way to address people's need to get around. Alternative 2 is correct in eliminating parking requirements.

- » **Thank you for your comment. The comment is noted.**

Flexibility in entrance locations helps keep design simple.

The elimination of the parking requirement is a major cost saving.

- » **Thank you for your comment. The comment is noted.**

Backyard cottages look great and fit in just fine. They will also allow people to have more choice in living in the size of house they want to.

- » **Thank you for your comment. The comment is noted.**

Overall alternative 2 is preferable because it lowers barriers to getting ADUs built. It provides needed flexibility in Seattle's widespread single family zones.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is less likely to encourage tear-downs than alternative 3. It will be more helpful in allowing families to remain in their neighborhoods by extending their houses (i.e. for aging parents) rather than

needing to move. Alternative 2 will help providing affordable housing options in the widespread single family housing zones in Seattle. Seattle's single family housing zones have contributed to our current housing crisis, wealth inequality and transportation difficulties. This is a change for the better.

» **Thank you for your comment. The comment is noted.**

ADU's are an incremental change if anything, and hardly differ from the impacts of tearing down small old single family houses to build giant new single-family houses. Alternative 2 is the best way to relieve some of that pressure.

» **Thank you for your comment. The comment is noted.**

Seattle easily has the capacity to absorb these changes. In fact many of the single family zones have remained constant in population or dropped slightly in recent decades.

» **Thank you for your comment. The comment is noted.**

### Follis-Goodkind, Maxx

Alternative 3 seems like the best action to me, HOWEVER - I don't understand why the requirement for the owner to occupy the residence is applied to Alternative 3 and not to Alternative 2. I think this would result in many owners not adding ADU/DADU and instead just selling properties instead of renting them. It feels like that was added just to make Alternative 3 unrealistic/unhelpful to solving the housing needs problem.

» **Thank you for your comment. The comment is noted.**

### Foltz, Mark A., Welcoming Wallingford

Mark A. Foltz

Welcoming Wallingford

3635 Burke Ave N.

Seattle, WA 91803

markafoltz@alum.mit.edu

June 24, 2018

Councilmember O'Brien, Ms. Pennucci,

I am writing to provide comments on the Council's Draft Environmental Impact Statement for backyard cottages and granny flats ("ADUs").

First, I want to thank the Council staff for preparing a comprehensive and thorough EIS that studies the history of single family zoning in Seattle, and in particular draws several important conclusions that set context:

Seattle's single family zoned areas have failed to absorb an equitable amount of the city's growth. In fact, single family zoned areas have lost population since 1970, when single family areas were downzoned and new housing was banned.

Single family zoned areas have generally become wealthier and whiter over time. Banning new housing in over 60% of the city's area have exacerbated Seattle's historical segregation by race and class.

Adding housing to single family zoned areas through ADUs will not lead to significant displacement of low income renters by tearing down rental properties. Nearly all of the single family homes on the rental market are already out of reach to low income renters.

On the contrary, homeowners who add a revenue stream to an existing property by building an ADU will be able to stay in their homes, helping with living expenses and sharply increasing property taxes.

My comments consider some of the 14 elements of the two action alternatives and recommends which aspects be included or amended in the Final EIS Preferred Alternative.

Welcoming Wallingford looks forward to working with the City to shape legislation based on this EIS that will increase affordable housing options across the city, which are desperately needed now more than ever.

Yours,

Mark A. Foltz

Welcoming Wallingford

Welcoming Wallingford are Wallingford residents and friends who welcome more neighbors and say "YES! in our backyard." Our vision is a more equitable, sustainable, and inclusive Wallingford and Seattle.

CC: Seattle City Council members, Susie Levy

Number of ADUs allowed on lots in single-family zones

The entire point of this exercise is to legalize and encourage the development of new housing in single-family zones, where it is now illegal; the past attempt to do so in 2010 has failed. In this light, a modified Alternative 3 - that allows two AADUs or two DADUs per lot - should be included in the Preferred Alternative.

The DEIS shows that two additional units have no adverse impacts, so why not provide maximum flexibility? This would legalize triplex style construction in single family zones. Note that there are many such units already in existence in Wallingford and in other neighborhoods that were historically downzoned from multi-family zoning. Let's look at the single block that I myself live on in Wallingford:

(image copyright Sightline Institute)

Green blocks represent duplexes and yellow blocks represent units that hold 4 or more people (including a quad-plex and a 6-unit apartment building). These have been here for decades and no one has been complaining about them or their "adverse impacts!"

Off-street parking requirements

Please include Alternative 2 in the Preferred Alternative as it removes off-street parking requirements from the construction of new housing. This is consistent with the recent effort by the City to unbundle parking from rent for tenants and to reduce minimum parking requirements throughout the city. Forcing the construction of off-street parking will essentially bundle its costs with that of the ADU, making them more expensive or impossible to build. Moreover, the DEIS shows that Alternative 2 will minimize the impact on tree canopy in single family areas. Some ADUs will have offstreet parking - that is fine - but give homeowners and tenants a choice and don't force people who don't need a car to subsidize the cost of building parking for everyone.

Owner-occupancy requirements

Single family homeowners are free to rent their entire property - even on platforms like AirBNB - with no owner occupancy restriction. Why should the owners of homes with ADUs face additional restrictions? More importantly, adding owner occupancy restrictions will discourage or prohibit the construction of new ADUs on second homes or households with seasonal occupancy, which goes counter to the goals of this process. Finally what happens if a homeowner with an ADU has to relocate on short notice? Kick out their tenants and tear down their ADUs? Please include Alternative 2 in the Preferred Alternative to remove the owner occupancy requirement out of a sense of basic fairness to property owners and future ADU tenants alike. The DEIS shows no adverse impacts for removing the owner occupancy requirements.

#### Minimum lot size, Gross Floor Area, and Height

In these aspects, the proposals in Alternative 2 will enable more properties to add ADUs. Please incorporate them into the Preferred Alternative. As the City needs to continue to invest in green stormwater infrastructure and also encourage deep green building, an extra two feet of height throughout would permit more efficient and greener construction techniques.

#### Maximum Household Size

I see no reason to limit households as they are today - common sense dictates increasing the household size in conjunction with the increase in the number of living units per lot. Please include Alternative 2 in the Preferred Alternative and raise the limit to 12 people per lot.

#### MHA requirements

Out of a sense of fairness to other housing developers, and to continue to build Seattle's base of permanent affordable housing, it makes sense to incorporate MHA in a specific fashion for a second ADU. I recommend customizing the MHA program for ADUs in two ways.

1. Ramp up the MHA fees over time based on the number of permitted second ADUs. The first 250 (or so) second ADUs would be fee-free, the next 250 at 25% fee etc. This will prevent MHA from immediately discouraging the construction of second ADUs at the time the program is rolled out.
2. Allow MHA fees to be prorated for 5 years after the unit is constructed. This will allow the homeowner to use rental income to pay off MHA instead of requiring a large upfront payment on top of construction and permitting costs. Homeowners do not have the same access to capital as real estate investors/ developers and the MHA program should take this into account.

Please consider alternative MHA fee schedules as suggested above in the final EIS.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Note, I will be sending these comments separately by email as the form does not preserve the images or formatting.

- » **Thank you for your comment. The comment is noted.**

### Fomon, Josh

Alternatives 2 and 3 are great options to create affordable housing. We should prioritize creating more housing over aesthetics -- especially when it comes to single-family zones. Every neighborhood is already diverse in its aesthetics -- and it always changing to accommodate new housing. Higher buildings and mixed-use buildings add to a neighborhood's character, economy, and sense of community. Seattle should embrace these aesthetics before any arbitrary factor such as tree canopy.

- » **Thank you for your comment. The comment is noted.**

Adding ADUs, DADUs, and backyard cottages is critical for Seattle moving forward on affordable housing and stopping from too many members of our community being pushed out of our city or even onto the streets. Changing our land use code must be done, and a mixture of both Alternatives 2 and 3 are important to getting this enacted properly and effectively --- with as many affordable units as possible.

» **Thank you for your comment. The comment is noted.**

Seattle is an overwhelmingly single-family zoned city. We need to change our understanding of what a single-family zone means, and add smaller ADUs and DADUs, and mix-used housing to drive down the costs of living. Creating affordable housing, market-rate housing, under-market rate housing, and affordable homes needs to be a priority to allow all Seattleites an opportunity to live and work in our great city. Seattle should not simply be a playground for the wealthy.

» **Thank you for your comment. The comment is noted.**

Seattle needs density and Alternatives 2 and 3 alleviate a small burden the Seattle housing affordability crisis faces. We need either of these option, in which we lose a bit of Seattle's tree canopy, but gain accommodations that could be affordable. 28% is a tremendous level of tree canopy for a city to already have -- and there are opportunities to expand it with city- and county-owned properties that aren't zoned for buildings or housing.

Furthermore, Seattle has an over-abundance of single-family homes. Reducing lot sizes, adding additional ADUs and DADUs must be a priority of the city to tackle the housing affordability crisis, property tax crisis, and housing inventory crisis. We must recognize that single-family dwellings aren't a one-size fits all solution and invest in density and anti-displacement measures.

» **Thank you for your comment. The comment is noted.**

The best parts of Alternatives 2 and 3 are strategies that will alleviate the housing crisis, create affordable housing, create density and vibrant communities throughout our city, and ultimately benefit every Seattleite who is able to stay in Seattle.

» **Thank you for your comment. The comment is noted.**

Parking and transportation don't matter if our neighborhoods don't have sidewalks, safe bike lanes, safe roadways, or adequate public transportation in which Seattleites can get around. Alternatives 2 and 3 provide for the density exceptions in which Seattle is already facing a crisis -- and we need make fewer cars a priority. Denser, walkable neighborhoods that are accessible de-prioritize the need for cars and consequently, parking spots.

» **Thank you for your comment. The comment is noted.**

## Foxley, Collin

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3.Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4.Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

5.Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6.More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7.Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8.Support raising maximum household size, total number of residents on site to 12.

9.Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10.Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11.Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Foxley, Jennifer

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1.Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one

detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allowed by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

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8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

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11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Francis, Susan

Owners should not be required to live on site. There are many single family homes that are currently being rented in the Queen Anne neighborhood. To require people who have an ADU or DADU to live on site is an unequal application of the law.

» **Thank you for your comment. The comment is noted.**

DADUs should increase in size to 1000 sq. Ft not including the garage

» **Thank you for your comment. The comment is noted.**

Making parking spaces required takes away from yard, and therefore green, space.

» **Thank you for your comment. The comment is noted.**

More density should be allowed in single family zones. It would be good to allow people to be able to live, and therefore afford, smaller units in the single family zones.

» **Thank you for your comment. The comment is noted.**

My residence is in Upper Queen Anne. We want to be able to build a reasonably sized DADU to live in. Our daughter and son in law are going to live in the main house with their family.

» **Thank you for your comment. The comment is noted.**

## Frisch, G

An EIS does not need the history of racism in the city. What has that to do with the proposed changes? Seems like a topic that is placed in the EIS for political reasons unless the city is saying the proposed changes will undo the past or solve the socioeconomics involved. If the city believes Single Family Zoning is inherently racist, they should say so in the EIS and defend it.

» **The comment is noted.**

After reading the EIS, I find it totally inadequate to support or defend the proposed changes. Stating "No Significant Impact" due to the proposed changes is totally unsupported by the information contained in the EIS. There are no facts provided or sound study methodologies described that even begin to address the environmental impacts caused by the proposed changes. Increasing the housing density in single family zoned neighborhoods will obviously impact parking, traffic, tree canopies, utilities, etc. Denying it by the authors of the EIS will not change the obvious facts.

There are too many inadequacies in the EIS to address them all in this comment form. An adequate EIS would at least address all of the concerns raised by the hearing examiner that forced this EIS. Each issue should be listed somewhere in the EIS and addressed with facts or sound study methodologies.

Facts and study methodologies need to address the entire city as the proposed changes apply to the entire city. Picking certain neighborhoods/zones of the city to study is inadequate as there is a diversity of neighborhoods/zones in the city. If a neighborhood/zone is picked to study, the EIS needs to defend why that is representative of the entire area being impacted by the proposed changes.

» **Please see the frequent comment response regarding individual neighborhood review.**

Trees. Destroying the character of the city's diverse single family neighborhoods (with the existing tree canopies and small scale) seems like a poor trade-off for few market rate housing units that would be created. It only takes one large ADU placed in a neighborhood to destroy the aesthetics of a block. A

visual representation of this would be easy to provide. The EIS is inadequate in assessing the loss of tree canopy caused by the proposed changes.

- » **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use, and exceptions added to the Preferred Alternative to preserve trees.**

The EIS does not provide an adequate assessment of the impacts of increased density on public services and utilities. Especially in the older neighborhoods.

- » **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

## Fucoloro, Thomas

Density allows more people to walk, bike and take transit. Homes for people are more important than homes for cars. Eliminate the parking requirements.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is clearly the best, though I wish it went even further.

- » **Thank you for your comment. The comment is noted.**

Backyard cottages are great for aesthetics.

- » **Thank you for your comment. The comment is noted.**

We need even more density.

- » **Thank you for your comment. The comment is noted.**

We need more homes.

- » **Thank you for your comment. The comment is noted.**

## Gagne-Maynard, Will

Again, I feel that Alternative 3 is still the winner here. Despite the possibility of decreasing street parking, the amount of space that we devote to storing people's cars on the public right of way is unfair to those who cannot afford or choose not to have cars.

- » **Thank you for your comment. The comment is noted.**

Alternative 3 is the winner in my mind. It will allow for the creation of additional rental properties or allow families to live together.

- » **Thank you for your comment. The comment is noted.**

I firmly support the implementation of Alternative 3 to reduce the barriers for the creation of ADUs and increase the number of housing units that we have available in our city. I think that this represents an incredibly easy way to add density to our city and the impacts are minimal enough for this to be worth implementing.

- » **Thank you for your comment. The comment is noted.**

I think that the land use impacts are minimal enough to pursue alternative 3.

» **Thank you for your comment. The comment is noted.**

This is of 0 importance to me. We are in a housing crisis and shouldn't be worrying about how this will affect the looks of the area.

» **Thank you for your comment. The comment is noted.**

## Gaynor, Robert

Building more housing is important to stop climate change and make more affordable for everyone.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Do not require parking. We need to move beyond everyone owning a car to stop climate change. Instead increase transit frequency, safe streets, and electric bikes.

- » **Thank you for your comment. The comment is noted.**

ADUs and DADUs look great. They add more variety to the residential areas.

- » **Thank you for your comment. The comment is noted.**

Expanding and improving utilities is much cheaper than continuing to increase sprawl and much much cheaper than hot much climate change will cost.

- » **Thank you for your comment. The comment is noted.**

Increasing urban density is required to address climate change.

- » **Thank you for your comment. The comment is noted.**

More housing options will allow more people to afford housing.

- » **Thank you for your comment. The comment is noted.**

Support the options that give the most housing options. (combination of options 2 and 3)

- » **Thank you for your comment. The comment is noted.**

## Geenen, Hugh

Please support the most flexible options for increasing the number of new Accessory Dwelling Units.

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity and institutional racism through land use planning as well as inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allowed by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered low-rise multi-dwellings.

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for

affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

Further study needed on limiting the size of the main house. For the final preferred alternative, we recommend that the city not include the maximum size limit on new houses proposed as part of Alternative 3. The DEIS indicates that the size limit would make teardowns less likely and ADU construction more likely. However, Alternative 3 also includes rules likely to impede ADU production (owner occupancy, parking, MHA). The analysis doesn't isolate the impact of each change, so it's unclear which change is doing what. For the final EIS, the city should conduct further analysis to assess the effect of the house size limit in isolation. A straightforward way to do that would be to apply the size limit to Alternative 2 and rerun the econometric model. If the city opts to include a size limit in the preferred alternative, it should exempt all AADU floor area from the size maximum, whether below grade or not.

Request for additional analysis to test limits. In general the DEIS shows that the action alternatives have substantial "breathing room" for causing any adverse impacts. This suggests that rules could be further relaxed without risk. Most importantly, the city should analyze allowing three ADUs per lot. Analysis could be simplified by assuming an upper-bound of 50 percent increase in ADU production. The city should also analyze a lower minimum lot size for DADUs (2,000 ft<sup>2</sup>), an allowance for two DADUs, an increase in the maximum size for AADUs (at least 1,500 ft<sup>2</sup>), and removal of limits on the number of unrelated occupants.

Thank you for the opportunity to provide comments.

Sincerely,

Hugh Geenen

[These comments having been submitted, I would like to add that the rules around land use as well as the requirements of the State of Washington Growth Management Act, like SEPA and the EIS process, are dated and no longer reflect needed environmental oversight. The Legislature needs to revisit these tools in light of the fact that the underlying principles of them are steeped in 20th century thinking before we fully entered our current period of a climate change emergency. The Growth Management Act needs to be updated for the 21st century and opposed to the long history of anti-urbanism, racism and classism that has historically driven land use and zoning in the United States. The proof that this is the case is that these processes are used time and time again *against* the types of initiatives, growth and development that are, in fact, more environmentally sound and more equitable than what is being replaced or substituted or frozen in amber by anti-growth, anti-development, anti-future, anti-change residents.]

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Gibbs, Susan

I believe these dwellings are good for the city. They allow affordable housing and give homeowners a means to generate income Thank You Susan Gibbs

- » **Thank you for your comment. The comment is noted.**

## Glenn, Kelly

I support the removal of barriers to ADUs as an effective and economic way to increase the supply of affordable housing. Before we invest millions in subsidized housing, we should give people a chance to create their own and to benefit from it.

» **Thank you for your comment. The comment is noted.**

## Goodman, Naomi

Please enact the following changes to the proposed ADU regulation: 1) Remove the parking requirement. The extra car parking space takes away both indoor square footage and garden space. 2) More height for green roofs. Current rules make it hard or impossible to build a comfortable two-story house with a green roof. 3) Don't count a garage as house square footage. If you build a home above a garage, why should the garage space count against the maximum square footage of the house? 4) Allow multiple in-house and detached units. Why can't a property have both a backyard cottage and a basement apartment? Or two in-house apartments and a backyard cottage? We have a housing crisis in the city and these are low impact options to a neighborhood's character while increasing the supply of housing in the city. 5) Get rid of the unrelated occupants limit. 6)

Streamline permitting. 6) Remove the owner-occupancy rule. If someone needs to move from their home for some reason (job, longterm family emergency, financial changes, because they want to, etc), should they have to evict residents and board up their backyard houses? Renters are just as valuable to a neighborhood as homeowners, and the rules shouldn't treat them differently.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Goodwin, Jennifer

Aesthetics will not be significantly impacted by allowing more ADUs, certainly no more so than what is currently allowed.

» **Thank you for your comment. The comment is noted.**

Creating more & smaller housing options via accessory dwellings is beneficial in allowing the aging, the young and the working class to remain in Seattle with housing they can afford vs. leaving the city. The city has approved so few ADUs since they became legal because the applicable regulations make doing so for many impossible.

» **Thank you for your comment. The comment is noted.**

I support option 3 in order to increase options for aging homeowners to age in place, and for their children or other renters to have more affordable options for housing without leaving the city.

» **Thank you for your comment. The comment is noted.**

More housing options will help the working class, the young and the elderly and will contribute to economic diversity.

» **Thank you for your comment. The comment is noted.**

Option 3 will promote the most density in neighborhoods while maintaining single family homes and I support that.

» **Thank you for your comment. The comment is noted.**

Homeowners contributing to available housing by creating ADUs should receive expedited permitting for hooking up utilities to their new construction.

» **Thank you for your comment. The comment is noted.**

## Gordon, Jason

Very supportive of Alternative 2 to remove barriers to create more ADUs/DADUs and therefore more housing.

» **Thank you for your comment. The comment is noted.**

## Gyncild, Brie

Alternative 2 makes the most sense for a city that is desperate for flexible, affordable housing options. Most important, we should not be requiring off-street parking for ADUs or DADUs, should not require MHA participation (the goal of MHA is to provide affordable housing, which ADUs and DADUs already help with), and should not require owner-occupancy.

» **Thank you for your comment. The comment is noted.**

We should not require off-street parking for ADUs and DADUs, period. We need to increase transit services - especially reliability and frequency - to all parts of the city, and we need to make our neighborhoods walkable and bikeable. But in 2018, we should not be prioritizing space for personal vehicle storage over space for people to live.

» **Thank you for your comment. The comment is noted.**

I am excited about Alternative 2, in particular, and anxious for this process to move forward, making it easier for people to stay in their homes, earn extra income or provide for elderly relatives, and create additional housing in our city. I support the changes recommended by groups such as 350 Seattle, but I urge you not to do anything that would trigger a second DEIS. We must move forward now!

» **Thank you for your comment. The comment is noted.**

Before Seattle had a single family zone, many neighborhoods had a mix of single-family houses, duplexes, triplexes, and small apartment buildings. As the EIS found, ADUs and DADUs would provide a mix of housing options in acceptable density that is compatible with Seattle's 2035 comprehensive plan. Moreover, Alternative 2 would likely decrease the number of existing homes that are demolished and redeveloped, which helps retain the character and history of the neighborhood.

» **Thank you for your comment. The comment is noted.**

## Hall, Brady

The proposed "alternative 2" change the the Seattle ADU/DADU rules is needed and necessary for the city to address the current housing crisis. The changes would also allow homeowners in this economic

transition period to generate extra income. It's a win/win. The current rules are outdated and applicable to an older version of Seattle that doesn't exist anymore.

» **Thank you for your comment. The comment is noted.**

## Hall, Leanne

2 ADUs should be allowed.

» **Thank you for your comment. The comment is noted.**

## Hance, Ginnie

Please adopt Alternative 2 with the following additions: within an Urban Village, the limit should be two ADUs and one or two DADUs depending on lot size.

One concern that came up in the public hearing was the diminishing of the tree canopy when increasing buildings in SF zones. A requirement could be added to plant a new tree if one was removed.

» **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use, and exceptions added to the Preferred Alternative to preserve trees.**

The aesthetic of a DADU or simple ADU on an existing property could not possibly be any worse than some of the amazingly ugly file cabinet/kleenex boxes they are currently putting up all over our SF zones.

» **Thank you for your comment. The comment is noted.**

Purchasing a home with an ADU or DADU becomes more affordable as a renter or a family member can contribute to the mortgage / utility costs. They also help prevent displacement as a home owner is not forced to move as they now have a renter to share in expenses.

» **Thank you for your comment. The comment is noted.**

Current single family houses were built for families - sometimes large families - 8 to 10 or more people. Today these same single family houses have one or two people. Adding an ADU or DADU for one to five people often does not even bring it up to the original occupant capacity.

Also, the current SF zoning lot coverages are usually much larger than the houses on those lots - I know because our family has built two new single family houses after tearing down the old tired originals. Adding one or two ADUs even if the house foot print is increased in most cases would not come close to what would be allowed for new construction. That could be a requirement, depending on the lot size - additions cannot exceed existing SF lot setback restrictions.

» **Thank you for your comment. The comment is noted.**

1. Financing for lower or fixed income home owners should be considered. This could be a good use for some of the MHA funds.

2. Please speed up the permitting process and cost.

3. A catalog of approved DADU city designs a home owner could choose from would help with costs and speed up the process.

4. Simplify the landlord/tenant laws for ADU/DADU owners. The current laws are difficult to navigate and could scare off a lot of folks.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

One area parking should be a concern in my neighborhood would be around the Fauntleroy Ferry Area. They are already swamped with folks parking in the neighborhood catching the ferry. In the same vein, there should be some parking requirements in Urban Villages - but that's another email.

- » **Please see the frequent comment response concerning impacts to parking.**

Again, the increase in capacity of these ADU/DADU SF homes are not any more than large families of a couple decades ago. It seems the public service/utility concern would be far greater in the urban village up zones - going from SF5000 to LR3, RSL, and NC3 or 5.

- » **Thank you for your comment. The comment is noted.**

## Harding, Kathy

Among the many differences that are obvious and avoided in the discussion of impacts within this section are the significantly low number of cars parked, the height, scale and bulk of the buildings, the lack of backyards and privacy, and elimination of most of the tree canopy, and of course the "heat island effect" which contributes to the increase in ambient temperature of the environment.

Additionally, the DEIS suggests that there will be no adverse impacts because maximum lot coverage calculations will not change and therefore no additional building area can occur. This is false on several levels:

A. The proposal calls for the reduction in allowable lot size from 4,000 sq ft down to 3,200 sq ft. The current code calls for a maximum lot coverage to be no greater than 35% on any lot above 5,000 sq ft. However, a 3,200 sq ft lot enjoys an exception and allows a lot coverage of 46.25% or 11.25% greater lot coverage than a typical single-family lot.

B. The proposal also changes a current regulation in place to preserve back yards, trees, open space and privacy. The current code limits lot coverage in rear yards to 40%. The proposal changes that to 60% which equates to a significant increase in building opportunities and diminishment of the rights of neighbors protected in the current code.

Beauty matters. Cramming tons of people into overdeveloped single-family lots by building ADUs is not the answer. Replacing silly townhouses that serve no one particularly well--not families with children, not elderly with mobility issues, not single people who want to stay in their homes as their needs change, not everyone's need for green space and privacy--with APARTMENT BUILDINGS is the answer to growth and increasing density!

- » **Please see Section 4.3, Aesthetics, for revised graphics showing cars and additional discussion of the aesthetics analysis methodology in Appendix C. Please also see Chapter 2, Alternatives, for a discussion of the Preferred Alternative, which would allow increased rear lot coverage for a one-story DADU only if its construction does not result in tree removal.**

For all the time and work you seem to put into these drafts, you seem to simply borrow from Portland planners. We are not the same city. Use your imagination and borrow from the dense cities of the east coast, where wonderful neighborhoods were organized around distinct identities. Ruining the beauty,

green canopy, and quiet of single-family neighborhoods in order to create density that benefits mainly property owners, landlords, and developers is short-sighted--and misses the entire point of creating affordable housing. We already know the the city doesn't encourage true affordable housing because the city doesn't require developers to pay fair market rate for affordable units not built and the city doesn't track the minimal fee developers do pay. Why not offer tax breaks or other monetary benefits to homeowners who want to develop mother-in-law apartments within their existing structure (either basement or garages)? Why not guarantee that the city will build parks to make up for the lost green space and places for children, pets, and grown ups to play and gather? Why not reject the out-of-character elevated "luxury" townhouses with rooftop decks -- that kill green canopy, create massive shadows, increase traffic/congestion, and sell for well over 1M dollars, in an absolute cynical slap in the face to cause of affordable housing -- and make developers build smaller, kinder houses with green space and smaller footprint? The people buying those townhouse, typically developers moving in from out of town, will indeed survive. The people of Seattle have enjoyed their smaller homes in single-family neighborhoods for generations.

» **Thank you for your comment. The comment is noted.**

NO ACTION IS BEST.

» **Thank you for your comment. The comment is noted.**

The DEIS does not address or present mitigations concerning the fact that ADU's are by definition not affordable. City witness Matt Hutchens, Architect who designs and builds ADU's and DADU's testified that these units are not affordable as construction costs can average \$250 -\$350 per sq ft to construct and would be rented for at least \$2,000-\$3,500 per month to cover development costs.

Why should the general public subsidize a property owners private investment?

Another very critical issue absent from the DEIS is the recognition that over 50% of these ADU's and DADU's are occupied not by Seattle renters, but by short term tourist and visitor stays through Airbnb, VRBO and others. The city's own survey and witnesses testified that ADU's and DADU's provided rental housing, and housing choices for family members as well. But they also admitted that 50% were being used as portfolio investments as short-term nightly rentals.

Again, why should the general public subsidize a property owners private investment?

The city has done no comprehensive analysis to determine how the ADU alternative options would impact -- increase or decrease -- the supply of affordable housing.

The issues of displacement are not comprehensively studied within the DEIS. As noted above within the Hearing Examiners Decision, the opportunities for displacement are broad and include many unintended consequences proposed in Alternatives 2 and 3. For instance, the City's own expert witness Sam Lai testified that by removing the owner occupancy requirement from the code, there

would most likely be a significant increase in destruction of affordable housing and displacement of communities that rely on those affordable homes, cultural displacement from neighborhoods that have enjoyed security for generations, and gentrification of vulnerable neighborhoods due to anticipated rampant speculation.

The ownership issue was completely overlooked and ignored as a potential environmental impact. The greatest concern among all citizens who provided commentary, testimony, and evidence in the last

few years has been the elimination of the owner occupancy requirement "" again rendering this DEIS inadequate.

- » **As outlined in Section 1.2, Proposal Objective, the objectives of this proposal are to remove regulatory barriers to make it easier for property owners to permit and build ADUs and to increase the number and variety of housing choices in single-family zones.**

The position that eliminating these protections and opening up every neighborhood to multi-family speculation would have no impact is absurd and lacks adequate professional study, any documented unbiased proof and a responsible and comprehensive study within the DEIS. There has been no analysis of the impacts of "scattershot" population density increases under ADU development, versus strategic development in urban centers and villages which focus development proximate to alternative transportation and social services investments.

Under full build-out, there is no analysis of public safety and security and social equity issues of population densities oriented to alleys and backyards, rather than to street sidewalks ("eyes on the street" security issues and social integration and community cohesion). There has been no analysis of fire and life safety issues with regard to fire protection from alleys, which currently the Seattle Fire Department prohibits.

And what are the shade and shadow impacts under full build-out for each alternative?

It is inconceivable to us that the DEIS cannot identify even one adverse impact.

- » **Please see the frequent comment response regarding individual neighborhood review.**
- » **The Full Build-Out scenario was included only in the aesthetics analysis to illustrate a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it here to illustrate the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.**

Your assumption that only 2-3 percent of single family parcels would develop ADUs is extraordinarily low. Indeed, why bother with this code change if that is the only anticipated growth? Therefore your projections for increased parking needs are not credible. You also fail to note that increased cars means not only increased parking needs but increased traffic -- speeding cars down narrow streets where children play, people walk their dogs, and neighbors gather to talk. We have already this seen shift DRAMATICALLY as people hurry to work downtown and to SLU. I have personally witnessed four near fatal collisions of speeding drivers into small children. Outside my house. If this doesn't impact livability, I don't know what does.

- » **Please see the frequent comment response concerning impacts to parking.**

During our appeal hearing, the City admitted that they had not even called Seattle Public Utilities to confirm that single-family neighborhoods could accommodate a doubling or tripling of households. While this was shocking then, this section of the DEIS basically appears to defend that decision by holding that any impacts upon utilities, schools, and other infrastructure has already been considered within the Comprehensive Plan, and therefore no further or much deeper study is necessary. Obviously, you lose credibility with this stance.

- » **Staff from Seattle Public Utilities have been involved in the review of the EIS. Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

## Harris, Marlow

Eliminate the parking requirement for MIL's, ADU's and DADU's.

» **Thank you for your comment. The comment is noted.**

I prefer Alternative #3 and believe that homeowners should be encouraged to build MIL apartments, ADU's and DADU's. Many folks can remodel their basements or garages and add living space. But it's important to make the rules simple and not so complicated, so more of these additional units can be simply and cheaply built.

» **Thank you for your comment. The comment is noted.**

By encouraging MIL's and ADU's, this is equivalent to "scatter site housing" and will help bring low-income people into already established neighborhoods.

» **Thank you for your comment. The comment is noted.**

Most MIL and ADU's will not even be noticeable, as they will be inside the current building envelope. No design review required!

» **Thank you for your comment. The comment is noted.**

There will not be any additional impact on public services and utility use for most MIL's and ADU's as most of these are small and will only house one or two extra people.

» **Thank you for your comment. The comment is noted.**

## Haugerud, Tosten

City streets are a public asset, and access to street parking is not a right of property owners.

» **Thank you for your comment. The comment is noted.**

"Backyard cottages" are by definition not visible from the street. The average lot size in Seattle single-family zones has plenty of space for additional density without blocking views or light to neighboring houses.

» **Thank you for your comment. The comment is noted.**

"incompatible with existing development" is a misnomer. This proposed Land Use Code changes are wise and forward-thinking.

» **Thank you for your comment. The comment is noted.**

I support the proposal to remove regulatory barriers to ADU/DADU construction in Seattle. This is cost- and space-effective method for adding density and (relatively) affordable housing in our city.

» **Thank you for your comment. The comment is noted.**

These are positive outcomes!

» **Thank you for your comment. The comment is noted.**

Finally! 23 members of the QACC wasted 2 years of precious time, only to be re-told "ADUs/DADUs are still a great idea". Keep pushing this forward!

» **Thank you for your comment. The comment is noted.**

## Heerwagen, Troy

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity through land use planning, and inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of

available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

### Herron -- Homeowner, resident

My hope would be for Seattle for Seattle to remove the owner occupancy requirement. Neither Portland nor Vancouver Require owner occupancy in their ADUs. Life is unpredictable and it's impossible to require every owner to have to either sell their house (instead of keeping it as a hard-earned investment) or stay in their house because the city makes them.

- » **Thank you for your comment. The comment is noted.**

Just because people can add ADUs, doesn't mean that every house will become a duplex or triplex.

- » **Thank you for your comment. The comment is noted.**

### Hevly, Nancy

This entire proposal is repugnant but the worst element is encouraging profit-seeking developers to take over single family neighborhoods when the city erases the requirement for owner-occupied rental properties. Our prime example is the University Park neighborhood north of the UW campus. Every kind of housing is available there -- boarding houses, accessory units, mother-in-laws, units in garages, basements and attics. All of this works as a desirable neighborhood for, families, students and tenants of all ages, races and incomes because the owner-occupied rule is the wall that repels slumlords and profiteers. It is shocking and dismaying that the city government hopes to hand this city of families (who vote for school and parks levies) over to the Sisleys of this world.

- » **Thank you for your comment. The comment is noted.**

### Hickey, Nate

Allowing height limit exceptions for dormers, skylights, and other projections is extremely important.

- » **Thank you for your comment. The comment is noted.**

Please remove all parking requirements and focus on residential parking zones and transit upgrades.

- » **Thank you for your comment. The comment is noted.**

Great work. Don't let the NIMBY's get you down. Seattle needs more creative legislation. One aspect that isn't covered is working with banks to ensure they value the income stream like a commercial property when they value loans, otherwise financing is more difficult.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Alternative 3 is superior if there were no owner occupancy requirement, which is a major hindrance to more units being developed. Alternative 2 is the next best option. We cannot afford to keep the status quo for ADU development when we have such good regional examples in Portland and Vancouver.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 seems slightly better than Alternative 3, but both do a good job of encouraging less tear-down scenarios, which will help retain neighborhood character. High levels of displacement around Greenlake is curious.

- » **Thank you for your comment. The comment is noted.**

Good impact statements that summarize the positive benefits of ADU and DADUs.

- » **Thank you for your comment. The comment is noted.**

## Hilde, Jean

I don't think DADUs or backyard cottages will change the aesthetic of a neighborhood. There are many DADUs in place now that no one ever sees or is even aware that they exist.

- » **Thank you for your comment. The comment is noted.**

If the City of Seattle is serious about increasing affordable housing, then adopting new ADU and DADU regulations, preferably Action Alternative #2, is the way to do it!

- » **Thank you for your comment. The comment is noted.**

I prefer Action Alternative #2. Homeowners should not be required to live on the property in order to build an ADU or DADU. This stifles the ability to build and to provide more housing. For instance, we own a property in Seattle that we rent to our children and their friends at low market rates because these young people cannot afford the going rates that Seattle demands. However, we ourselves do not live on that property. With the current regulations, we cannot build an ADU or DADU (which would provide more housing for our young family friends) even though our family members live on the property.

- » **Thank you for your comment. The comment is noted.**

## Hill, Gregory

The DEIS provides an limited discussion regarding this important issue. During the 1980's, Seattle was routinely mentioned as one of the most livable cities. The most often cited reason was the ability to own a house relatively close to downtown and a network of neighborhood businesses that made it possible for many shopping trips to be walking trips, and the supply of low cost, older buildings for start up businesses.

The proposed changes to the DADU ordinance (now ADU to confuse the issue) are particularly traumatic as regards the cost of housing. Proponents like to suggest that having a DADU will make it cost less to live in your house. However, no realistic proforma has been provided. What can be said is that we know there is vast wealth in Asia looking for a place to invest. We can see the affects in Vancouver B.C. The proposed elimination of the owner occupancy requirement will convert our city of homes, to investment properties. This will significantly raise the value of homes and the vast wealth will quickly convert our city from one with ownership opportunities to one without. I fail to see the economic impacts of converting the housing in Seattle from family home ownerships to investment opportunities for non-residents from other countries.

I understand that some members of the city council believe this will create thousands of new homes. It is clear that only half of the DADUs built to date are even rented. The notion that we can solve housing cost by selling out city to foreign investors is really not adequately discussed or weighed as befits such an important change.

- » **Please see Section 4.1, Housing and Socioeconomics, for a discussion of housing and socioeconomics, including a pro forma analysis to help understand how the proposed changes might alter the underlying real-estate economics.**

Trees are an important resource in our city. Already people buying on speculation are asking that all trees be cut down as a term of sale. It is easy to see our city being changed to a barren landscape under the current proposal.

This has happened in the commercial and lowrise zones, it should not be allowed to happen in the SF zones.

- » **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use, and exceptions added to the Preferred Alternative to preserve trees.**

The graphics in this document appear to be calculated to hide the impacts of this DADUs as proposed.

- » **Please see Section 4.3 - Aesthetics and Appendix C for information about the methodology used in the aesthetics modeling and analysis.**

## Hollowed, Danae

I prefer Alternative 2.

- » **Thank you for your comment. The comment is noted.**

## Hornyack, Peter

Please support the most flexible options for increasing the number of new Accessory Dwelling Units. Seattle's long history of codified inequity through land use planning has resulted in an unprecedented shortage of housing, skyrocketing rents and rampant economic displacement. I support reform for ADU and DADU construction because we need to use every tool available to help alleviate Seattle's housing shortage.

The Draft EIS has concluded that the environmental impacts of reducing regulation of ADUs are non-significant. I would like to see the preferred alternative in the final EIS recommend all options that increase ADU flexibility and reduce barriers to the construction of new ADUs. I strongly support all of the recommendations from the Seattle Planning Commission [<https://www.seattle.gov/Documents/Departments/SeattlePlanningCommission/MinutesAndAgendas/FinalSPCADUDEISLetter.pdf>] and urge

that the final EIS incorporate these recommendations. I would like to see the preferred alternative in the final EIS recommend:

- Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize housing, trees and open space over vehicle storage.
- Striking all owner-occupancy restrictions. Owner-occupancy requirements are classist because they are predicated on the idea that renters are inferior neighbors to owners. For that reason alone they should be eliminated, but even worse these requirements would reduce the overall number of accessory units constructed. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement [<https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/EncouragingBackyardCottages/RemovingBarrierstoBackyardCottages.pdf>]. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Eliminating owner occupancy restrictions would allow maximum flexibility for both renters and owners.
- Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allowed by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
- Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key.
- Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
- More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
- Increasing the allowed gross floor area for detached accessory dwelling units to 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
- Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.
- Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.
- Finally, do not apply Mandatory Housing Affordability (MHA) for ADU and DADU construction, and eliminate as many other permitting fees as possible. Any fees will reduce the overall number of accessory units constructed at a time when a severe shortage of housing of all types is the primary contributor to rising rents and economic displacement in our city.

Sincerely,

Peter Hornyack

3806 Evanston Ave N (District 6)

Seattle, WA 98103

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Howard, Oralea

I support Alternative 3.

- » **Thank you for your comment. The comment is noted.**

My only concern is related to permeability. I understand that there is an incentive to have a green roof but I would like to see further discussion of how Seattle will address runoff as our density increases and we see greater amounts of precipitation from the effects of global warming in the years ahead.

- » **Please see Section 4.5, Public Services and Utilities, for discussion of stormwater and Chapter 2, Alternatives, for a discussion of lot coverage.**

## Hunter, Collin

I believe it is important to match the look and feel of the original house as well as the neighborhood.

- » **Thank you for your comment. The comment is noted.**

Having two children that are graduating or in college, or parent in-laws that are aging, I have no simple way to provide assistance like I could if permitted to build a back yard cottage, that is a livable space. The financial impact on them is huge. By allowing me to have this as an option it would provide tangible benefits to my family in the short term as well as rental income in the long term.

- » **Thank you for your comment. The comment is noted.**

Current land use is inconsistent at best. You can take a 7000 sq ft lot and split it, while having lot coverage of 80% or more. You should provide a home owner that same ability with a detached dwelling, other wise you benefit the developers but not the homeowners. I agree the dwelling should match the look and feel of the neighborhood.

- » **Thank you for your comment. The comment is noted.**

I support expanding the ability of homeowners to have this as a viable option. Current restricts do not allow a homeowner to capitalize on providing housing to family or renters. We looked into building a detached mother-in-law and could build a 300 sq ft dwelling at a cost of \$200k, the math did not add up. Not to mention who would want to live in a closet.

- » **Thank you for your comment. The comment is noted.**

As Seattle is moving towards enticing folks to not drive cars, the need for off street parking is inconsistent with that goal. I would also say many current houses are not required to have off street

parking so why should you place an additional barrier on folks that want this as an option, when it is not required by a stand along house.

» **Thank you for your comment. The comment is noted.**

Seattle is growing and the density is increasing. This provides an option that helps address the issue.

» **Thank you for your comment. The comment is noted.**

## **hutchins, matt**

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity through land use planning, and inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

parking is a huge impediment, leads to unnecessary impervious area and often is immediately abandoned, so also money down the drain

- » **Thank you for your comment. The comment is noted.**

concur that slight increases in bulk do not increase environmental impact

- » **Thank you for your comment. The comment is noted.**

Thank you for your excellent work on the options!

- » **Thank you for your comment. The comment is noted.**

Please study the FAR limitation, but with incentives to get back to the SFZ bulk by building accessory dwellings, building green, preserving existing housing

Owner Occupancy restrictions limit many of the potential options over the life of a dwelling and should be stricken outright.

- » **Thank you for your comment. The comment is noted.**

increase height, and rear yard lot coverage. do not apply MHA fees to accessory uses.

- » **Thank you for your comment. The comment is noted.**

streamline permitting by dedicating three reviewers to ADUs--it would make the process much friendlier to neophytes who'd like to build an ADU for themselves

- » **Thank you for your comment. The comment is noted.**

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Please study the FAR limitation, but with incentives to get back to the SFZ bulk by building accessory dwellings, building green, preserving existing housing

Owner Occupancy restrictions limit many of the potential options over the life of a dwelling and should be stricken outright.

- » **Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes an FAR limit. Please see section 4.1, Housing and Socioeconomics for how that impacts the estimated number of ADUs built.**

## Jacoby, Kathryn

I am a homeowner in District 6, in Greenwood. I would like to see more density within neighborhoods, including my own. Before I bought, finding an affordable place to rent, with outdoor space (private or shared) where our pets could run around and we were removed from busy, noisy roads, proved difficult. Had there been any ADUs or backyard cottages to choose from, we would have had a better set of options. ADUs are a great alternative to apartments for a peaceful place to live, family friendly, and affordable, with outdoor access. I would like to see the City make them easy and attractive to build and occupy. \*I support and echo the recommendations of pro-density/pro-ADU/DADU groups, like Sightline and SeaTech 4 Housing.\* If we're being honest, I don't want to live on a busy, trafficky, exhaust-heavy thoroughfare like Aurora or Holman; I'm guessing you don't either. Allowing/encouraging low-impact density to neighborhoods gives people more choice in their housing situations and healthier, safer, happier places to live. Thank you for considering the needs of all Seattleites, including renters.

- » **Thank you for your comment. The comment is noted.**

## James, Rochelle

This is what I am most concerned about. Our infrastructure is failing and pushed to its limits. The idea that this City would allow more density without developers carrying the lion's share of the infrastructure repair/update costs is beyond me. We have an aging sewer system and on older lots, they will probably

need to replace old pipes that lead from the property to the main line. Density should not come before infrastructure improvements.

» **Thank you for your comment. The comment is noted.**

No one should ever have to park on a public street every day in front of their home. My street is always full of car to go and adding more permanent cars would be a nightmare. Our streets are already too narrow as it is. In the places where there are no sidewalks, the street will be turned into an unsafe one lane road if people cannot park in their driveway. No new density without dedicated parking.

» **Thank you for your comment. The comment is noted.**

Visually this looks like a shanty town. The loss of privacy and natural light due to increased height is already bad enough. Adding the accessory dwellings affects privacy and noise as well.

» **Thank you for your comment. The comment is noted.**

Increased density is already putting a strain on neighborhood resources including fire, police, healthcare, childcare and other necessity services. Changing the land use also eliminates options for people. Single family neighborhoods offer a sense of community and stability that people desperately need. As a person of color who lives in South Seattle, I know first hand that density is negatively affecting people of color. The City must rectify this by slowing growth in South Seattle. The residents here are less equipped to handle it. Unlike Madison Park, Wallingford, Magnolia, Ballard etc. All of these neighborhoods are already wealthy and can better handle the high prices that density brings. We cannot in the south end.

» **Thank you for your comment. The comment is noted.**

Option 1 is the preferred option - No action should be taken at this time

» **Thank you for your comment. The comment is noted.**

Stop this density nonsense. We have a ton of available housing. Numbers are not the issue. Affordability is the issue. The City needs to get a backbone and require that all of these new apartments have a percentage of units that minimum wage earners can afford. Seattle policies are causing segregation and displacement. If every new building was required to have a percentage at 30% earners and the rest at market rate they would still make money, units would be filled and our communities would be more diverse.

» **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Increasing the number of units has not increased affordability in Seattle whatsoever. However, the lack of planning on the part of the City to mitigate the impacts of our increase in population has had negative effects on current and new residents. The quality of life in Seattle is going down as prices go up and the strain on our roads, utilities and other vital services are stretched.

» **Please see Section 4.1, Housing and Socioeconomics, for a discussion of potential impacts of proposed changes on housing affordability. Please see Section 3.2, Planning Context, for information related to additional strategies the City is considering related to ADU cost and affordability.**

## Jensen, Eric

Alternative 2 looks like the best option.

- » **Thank you for your comment. The comment is noted.**

## Jensen, Jim

Please support Alternative 2, which provides the greatest flexibility in establishing attached and detached ADUs in our neighborhoods.

- » **Thank you for your comment. The comment is noted.**

I appreciate the opportunity to create up to two ADUs per lot without the owner occupied restriction previously in place, including the option of putting the ADU in the front or side yard as may be viable on any particular lot. I support this flexible approach to creating more density in our single-family neighborhoods.

- » **Thank you for your comment. The comment is noted.**

## Jeremy Swirsley

Lots should allow 2 ADUs and an ADU. Remove owner occupancy requirement. Do not limit the size and footprint of ADU.

- » **Thank you for your comment. The comment is noted.**

I would support allowing more ADUs to be constructed.

- » **Thank you for your comment. The comment is noted.**

Please remove all parking requirements.

- » **Thank you for your comment. The comment is noted.**

Seattle seems well prepared for this.

- » **Thank you for your comment. The comment is noted.**

## Johnson, Cathy

I support Alternative 2: one in-law apartment and one backyard cottage allowed on the same lot; parking no longer required for ADUs; the homeowner may live elsewhere.

- » **Thank you for your comment. The comment is noted.**

## Johnson, Maggi

We have to allow our single-family zones to be used more efficiently and allow them to get a little denser. I think the ADU's and DADU's are compatible with that. One great thing about DADU's is that, unlike in apartment buildings, residents have a little bit of access to private outdoor space for gardening and relaxation. As long as we have requirements that limit lot coverage and, I think, requiring owners to live

on site (to prevent developers from maximizing occupancy in an unthoughtful manner), I think we can continue to have lovely, green, vibrant neighborhoods.

» **Thank you for your comment. The comment is noted.**

As mentioned above, I wonder if it is possible to "tune" the parking requirement to the neighborhood. For instance, in our neighborhood (Lakewood--southeast Seattle) there are generally far fewer cars parked on the neighborhood streets than in, say, Phinney. So maybe our neighborhood is more capable of having units without off-street parking.

» **Thank you for your comment. The comment is noted.**

Generally, I support Alternatives 2 or 3, or some combination of alternatives. I wonder if it is possible to "tune" the parking requirement to the neighborhood. For instance, in our neighborhood (Lakewood--southeast Seattle) there are generally far fewer cars parked on the neighborhood streets than in, say, Phinney. So maybe our neighborhood is more capable of having units without off-street parking. We have a 800 sf backyard building that was built as a work-studio/storage space. We would love to convert it now to a DADU. It would be perfect for someone--snug and comfortable, nice setting. However, it was built to 2002 energy code. Due to the design, it would be prohibitive to insulate it up to today's code to get it permitted. Our main barriers to turning this viable living space into a DADU is the energy code requirement and the off-street parking requirement. However, I do think that owners should be living in the house where there are ADU's and DADU's. I think if people start developing lots completely for rental, that will adversely affect land use and aesthetics.

» **Thank you for your comment. The comment is noted.**

As mentioned above, I did not see any chapters addressing access to parks, trails and other public places (is it included and I missed it?). In a denser City, these types of spaces are critical to maintaining quality of life. The final EIS ought to specifically address the needs for green spaces in a denser City, the load on existing resources, and the expected costs of making sure these resources will be in good shape and meet the needs of the growing population.

» **Please see Section 4.2, Land Use. This section has been updated to include a discussion of parks and open space.**

I prefer options that would result in fewer tear-downs. As I mentioned above, I also think that owners should be living in the house where there are ADU's and DADU's. I think if people start developing lots completely for rental, that will adversely affect land use and aesthetics.

» **Thank you for your comment. The comment is noted.**

I have read studies of all the empty bedrooms in Seattle, due to a number of factors including empty-nesters and foreign investors. With our critical housing shortage, I support changes that make more affordable units available and make better use of our land and housing stock. We absolutely have to provide more housing for people, and this seems like a relatively gentle way of doing it.

» **Thank you for your comment. The comment is noted.**

In a denser City, access to parks, trails and other public places where people can comfortably hang out and recreate is critical. I think this is should be addressed in this chapter.

» **Thank you for your comment. The comment is noted.**

## Johnson, Matthew

I support the alternative that provides the maximum number of housing units in the shortest time. WE HAVE A HOUSING CRISIS.

» **Thank you for your comment. The comment is noted.**

WE HAVE A HOUSING CRISIS, NOT A BAD LOOKING BUILDING CRISIS!

» **Thank you for your comment. The comment is noted.**

All SF zoning should be rezoned to LR3.

» **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations to rezone single-family zones is outside the scope of thi EIS.**

WE HAVE A HOUSING CRISIS. ACT LIKE IT!

» **Thank you for your comment. The comment is noted.**

Get rid of all parking minumums. WE HAVE A HOUSING CRISIS.

» **Thank you for your comment. The comment is noted.**

## Johnson, Whitney

I'm a long time member of Seattle's Central District (district 3), a neighborhood my family has lived in for over 50 years (experiencing redlining and other racist land use policies & practices). Currently I live with my mother and grandmother (a household of 3). I want more housing and simpler, easier regulations guiding ADU development because I see it as one of the only ways that I and my family will be able to continue to afford to live in this city, and in this neighborhood. The ability to construct an ADU is one of the few ways that I see being able to also maintain inter-generational, as well as mixed-income housing in the city.

I support final EIS recommendations that do not apply Mandatory Housing Affordability rules, since I know of many ADUs that are used for family, or rented well below market -- which is what I will do if I am able to construct an ADU for my family! Adding a fee for their creation for affordable housing would drastically reduce the ability of normal people like me to make their own contribution to more housing that is affordable!

In addition -- I support reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans people who want to build an ADU have a clear and predictable pathway through permitting. Permitting challenges have been a huge and expensive hurdle for my church (Madrona Grace Presbyterian) in trying to build a tiny house and house a homeless person on our property - during which our city declares a homelessness state of emergency! Please align our city policies with our stated investment in, and dedication to, equity and racial justice by allowing people to build affordable housing in simple, straightforward ways!

Lastly, I hope that these recommendations reflect a sense of environmental equity and justice by reflecting how much housing development and displacement has been concentrated in some neighborhoods (like the CD) and not others (e.g. <https://www.seattletimes.com/seattle-news/data/some-seattle-neighborhoods-are-untouched-by-rapid-population-growth-why/>) -- I think ADUs/DADUs

are one avenue to creating both more housing and greater equity as far as development and growth has touched this city.

Thank you!

- » **Thank you for your comment. The comment is noted.**

### Jonas, Melissa

We need to make it easier to build all kinds of housing, and we need zoning solutions that make it easier for people to remain in our community. Lowering barriers to building ADUs will help everyone.

- » **Thank you for your comment. The comment is noted.**

Please prioritize race and social equity toolkit results over public comment.

- » **Thank you for your comment. The comment is noted.**

### Jude, Roxane

I strongly oppose ADU zone change on single family zones! I live in a mixed zone neighborhood and parking is a nightmare, blocking driveways and mailboxes! We don't even have sidewalks. Out of country buyers snap up Seattle property for profit before a resident hopeful has a chance to bid.

- » **Thank you for your comment. The comment is noted.**

Over crowding is already a problem

- » **Thank you for your comment. The comment is noted.**

Terrible affect on parking and traffic is already bad. Parking a problem in my mixed zone neighborhood

- » **Thank you for your comment. The comment is noted.**

Terrible idea that will only impact quiet neighborhoods and turn them into where I live off Greenwood Ave and Bitterlake! Terrible parking problems with car prowlers regularly.

- » **Thank you for your comment. The comment is noted.**

### Justice, Kathy, Johnston Architects

I support Alternative 2, most importantly to remove the owner-occupancy requirement, since it not required of the rental of single-family homes. The rules should be consistent.

- » **Thank you for your comment. The comment is noted.**

The rules for height and the direction that the front door is oriented should be consistent.

- » **Thank you for your comment. The comment is noted.**

Not only do ADUs help non-developers invest in their community using smaller construction budgets, allowing mother-in-law apartments to give older family members a place to age in place or to give young adult kids a place to jump start their lives.

- » **Thank you for your comment. The comment is noted.**

Reducing restrictions on ADUs is the least impactful way to increase density without sacrificing the character of individual neighborhoods. Current Land Use Code promotes tearing down a small single family home and replacing it with a massive single family home.

» **Thank you for your comment. The comment is noted.**

Be swift. Expedite permit processing. Hire more SDCI staff, especially SDOT. Thanks.

» **Thank you for your comment. The comment is noted.**

The rules should be consistent for ADUs, single-family homes, and apartment buildings. Parking exceptions that are available for those housing types need to be available for ADUs.

» **Thank you for your comment. The comment is noted.**

Having greater density is an efficient use of public transit, community services, and utilities.

» **Thank you for your comment. The comment is noted.**

### kaminski, robert

Please support the most flexible options for increasing the number of new Accessory Dwelling Units.

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity through land use planning, and inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

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Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Kaufman, Pat

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

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- » **Thank you for your comment. The comment is noted.**

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

- » **Thank you for your comment. The comment is noted.**

Support raising maximum household size, total number of residents on site to 12

- » **Thank you for your comment. The comment is noted.**

Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

- » **Please see Chapter 2, Alternatives, for a description of what is included related to reducing permitting costs.**

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

- » **Thank you for your comment. The comment is noted.**

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

- » **Thank you for your comment. The comment is noted.**

## Keller, Jeremy

I don't believe this analysis addresses some of the benefits of requiring less parking spaces. Less parking means less impervious surfaces which reduces runoff, increases rainwater infiltration, and decrease the urban heat island effect. Other benefits to less parking requirements are decreased construction costs, which lowers housing costs and will lead to more affordability.

- » **Please see the frequent comment response concerning the positive impacts of the proposal.**

In general the study understates the benefits of option 2 to the environment and community from increased density and more housing stocks ability to drive affordability.

- » **Please see the frequent comment response concerning the positive impacts of the proposal.**

My impression is that the owner-occupancy requirements in options 1 and 3 are more onerous than given credit for in the analysis. The owner-occupancy covenant limits a home owners options to address future uncertainty. Personally I have wanted to build an DADU, but we live close enough to the university that we expect we will want to rent the house out in the future. Furthermore the home value would be reduced with a covenant in place limiting the ability to rent it.

- » **Please see Section 4.1, Housing and Socioeconomics, for additional discussion related to the effects of the owner-occupancy requirement on ADU production.**

This chapter doesn't fully address the benefits of increased density to the delivery of public services and utilities. Spreading the fixed infrastructure costs of the utilities over more consumers will decrease cost of service for all residents of the city.

- » **Please see the frequent comment response concerning the positive impacts of the proposal.**

## Kelsey, AM

Alternative 2 is preferred as it brings the most units into existing developed areas. Aesthetic impacts will be acceptable.

» **Thank you for your comment. The comment is noted.**

Alternative 2 is preferred.

» **Thank you for your comment. The comment is noted.**

Alternative 2 is preferred. Changes to density and scale will be acceptable.

» **Thank you for your comment. The comment is noted.**

Alternative 2 is preferred. Transportation, and parking impacts will be acceptable.

» **Thank you for your comment. The comment is noted.**

Let's please get going on this! We can't have the sort of housing crisis seen in San Francisco. In-fill is critical. Allow homeowners some flexibility in helping create more housing choices in desirable, close-in neighborhoods. Level the playing field between homeowners and developers and waive the parking requirement.

» **Thank you for your comment. The comment is noted.**

## Kennedy, Iola

please do not apply MHA rules to ADU or DADU construction

» **Thank you for your comment. The comment is noted.**

treehouses would allow us to keep more of our canopy in place.

» **Thank you for your comment. The comment is noted.**

visual interest could be greatly improved by encouraging unusual building types.

» **Thank you for your comment. The comment is noted.**

I would like building codes to be modified such that unusual structures such as treehouses can be approved if they meet livability standards.

» **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to the building code are outside the scope of this EIS.**

## Kent, Le'a

I support Alternative 2 because it does not maintain the owner-occupancy requirement in perpetuity. I hope that eventual legislation will have a temporary owner-occupancy requirement of 2-5 years--long enough to deter developer use of ADU/DADU as a "single family triplex loophole," but short enough to allow for flexibility for the property owner and to ensure that the housing stock created by additional ADUs and DADUs is not destroyed if the original owner/builder is no longer able to live on the property. The FAR ratio changes in Alternative 3 are interesting because they disincentivize the building of unaffordable, very large houses, but without the ability for the property to eventually go into the hands

of a non-owner-occupant, Alternative 3 does not result in the long-term creation of more affordable housing stock.

» **Thank you for your comment. The comment is noted.**

Alternative 2 does not require permanent owner-occupancy of the property. Alternative 3 does. This Chapter failed to consider long-term marketability of the ADU property and failed to consider whether the affordable, denser housing options created by more ADUs and DADUs will be sustained if the only option when the original owner dies or chooses to sell is to sell to another owner who will owner-occupy. Under Alternative 2, the next owner could either be an owner who lived on the property or an investment purchaser. Under Alternative 3, the only possible sale is to an owner who wishes to live on the property. Indeed, under current code, if the new owner did not want to live on the property or was eventually unable to live on the property, the DADU or ADU would have to be destroyed as a separate dwelling unit. The impact of future destruction of housing units under Alternative 3 is not set forth in the analysis.

» **Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes removing the owner-occupancy requirement.**

### Kirk, Christopher

It is impossible and unnecessary to list all of the missing and inadequate aspects of the draft EIS because the scope of the proposed action is so grossly and irrationally broad. The proposed land use changes cover all of the single-family zoned land in the city, and about half total city land area, and therefore the analyses of impacts are unrealistically crude and inappropriate. The EIS lumps together all of the many different types, scales, locations, geographies, economies, and populations of the diverse areas and neighborhoods in the city into a few generic examples for analysis. The EIS must be broken up into separate environmental impact reviews, one for each identifiable sub-area of the city, the same way normal, rational urban planning is conducted. This is not too much to require when considering the potential impacts to so much area and so many people.

» **Please see the frequent comment response regarding individual neighborhood review.**

### Kolton, Bryce

Parking requirements are totally unnecessary for any single family housing within a ten minute walk of a frequent bus line. Instead of subsidizing cars and single occupancy vehicles, which make up a small minority of people entering Seattle, let's reinvest money into the bus and bike networks which carry far more people. Do not require parking on the property; with parking spots costing up to hundreds of thousands to build per space, we should not be investing in such a wasteful transportation method in Seattle.

» **Thank you for your comment. The comment is noted.**

It's nice to see that models predict increasing AADU and DADU properties will keep so many local and older houses from being torn down for the new giant houses we see developers creating. It means more families can live in Seattle

» **Thank you for your comment. The comment is noted.**

Large DADUs, so long as they remain somewhat shorter than the original building, do not seem to negatively damage the aesthetics of a neighborhood because they tend to sit behind the existing home.

» **Thank you for your comment. The comment is noted.**

I prefer Alternative 3 for its higher density and more potential units, which will hopefully increase affordability in Seattle. However, requiring off-street parking seems unnecessary for most units, especially those along transit corridors.

- » **Thank you for your comment. The comment is noted.**

If possible, urban villages should be expanded, and general zoning around Seattle should allow denser buildings in single family areas, especially near current and future transit lines.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to urban village boundaries are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

## Kranwinkle, Sara

Every house should have 2 parking spaces.

- » **Thank you for your comment. The comment is noted.**

The city's environmental impact study should reflect every neighborhood.

- » **Please see the frequent comment response regarding individual neighborhood review.**

The EIS is too general- it doesn't reflect the different qualities of each neighborhood.

- » **Please see the frequent comment response regarding individual neighborhood review.**

Yes, the visual impact of a lack of trees and large number of boxy structures is depressing, and not the Seattle I was raised in. Please try to vote for something that helps retain the charm of our neighborhoods.

- » **Thank you for your comment. The comment is noted.**

I vote for No Action Alternative (Alternative 1) to the Land Use Code

- » **Thank you for your comment. The comment is noted.**

You can't use a blanket approach with single family homes as they differ depending on the neighborhood. Adding ADU's/DADU's in Magnolia for instance will increase property taxes and not increase affordable homes.

- » **Please see the frequent comment response regarding individual neighborhood review.**

Increasing the height of buildings and their setbacks on Queen Anne Ave N will change the entire feel of the main street. It will lose its charm and neighborhood feeling. If QA Ave is on the list, why isn't Madison Ave in Madison Park on it?

- » **The study area for the EIS includes land zoned single-family outside of existing urban villages and urban village expansion areas studied in the Mandatory Housing Affordability EIS (please see Exhibit 2-1 in Chapter 2 Alternatives for a map of the study area). A duplex is not a permitted use in single-family zones. An existing duplex would be considered a nonconforming use. Adding an ADU to a nonconforming use might be possible but would require review by the Seattle Department of Construction and Inspections to determine that the existing duplex is legally nonconforming.**

## Kuever, Karyn

I was unable to read the entire draft, but saw nothing regarding the requirement that the electrical box had to be in a common area to both the dwelling and the ADU. I had what could have been a nice ADU when I lived in Seattle, but the box was in the ADU. We had friends living in it for awhile and they were perfectly OK with us entering their unit in an emergency if we had to access the breaker. They only lived there a short time, but in the 6 years we had the home, we only had to access the box twice. It seems unnecessarily expensive to have to move the electrical box when it is such a rare need and the landlord does have the legal right to enter a tenant's dwelling in an emergency. People who are interested in the lower rent and convenience of ADU's are quite willing to accept an inconvenience or two, and this should not be a barrier. If this were changed, it would remove a financial barrier to lots of people with potential ADU's in accessible basement areas.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to building or electrical codes are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

## Kundig, Olson

Parking should not be an issue in SFO zoning. This is a non-issue. I do not think ADUs or DADUs should have ANY required parking.

- » **Thank you for your comment. The comment is noted.**

I support Option 2 and 3, we need as much housing as possible in the city

- » **Thank you for your comment. The comment is noted.**

This is a really great study. Ultimately, I think it proves we need to simply upzone our Single Family zones. I don't think this is a good solution, at all, and the neighborhood would be better off if it simply upzoned to allow for larger development. Some people would hang onto their single family properties and others wouldn't, ultimately, it would provide a variation in scale that makes Capitol Hill so pleasant. This proposal is a band aid, not a solution. That said, since I'm arguing for the most density possible, I'm for Option 3, still.

- » **Thank you for your comment. The comment is noted.**

If, your first goal is: "Community. Developing strong connections between a diverse range of people and places" we should be upzoning all SFO neighborhoods.

- » **Thank you for your comment. The comment is noted.**

## LaBenz, Scott

I am in favor of Alternative # 2 for the proposed changes to ADUs / DADUs

- » **Thank you for your comment. The comment is noted.**

## Lague, Rich

I support Alternative 2

- » **Thank you for your comment. The comment is noted.**

We desperately need more affordable housing. Increasing the density of our neighborhoods is the best way we can create that housing.

» **Thank you for your comment. The comment is noted.**

## Lamb, Jim

The EIS seems to show a huge oversupply of parking in our city. This doesn't even count the tens of thousands of garages that aren't used for cars. If we aren't going to force homeowners to park in their garages, we shouldn't be forcing parking to be included with ADU/DADUs

» **Thank you for your comment. The comment is noted.**

Strong preference for Alternative 2

» **Thank you for your comment. The comment is noted.**

Strong preference for Alternative 2. Owner occupancy will be a headache to police and can easily be gotten around. If the owner isn't required to live in a home that doesn't have an ADU, I don't see why having an ADU should require them to be there. That restriction feels like a made up way to suppress construction.

» **Thank you for your comment. The comment is noted.**

More units and fewer McMansions make this city accessible to more people. Alternative 2.

» **Thank you for your comment. The comment is noted.**

We allow such a variety of styles and sizes for single family residence that the impact to scale for DADUs seems small. The smaller DADU buildings provide a nice contrast to giant homes being built.

» **Thank you for your comment. The comment is noted.**

We should take a regional view here. It's more efficient to have residents living in higher density than to have suburban sprawl. These new residents will also increase tax base in Seattle, which can go towards expanding utility capacity.

» **Thank you for your comment. The comment is noted.**

## Langager, Mark

Either 2 or 3 would be good, because of the dire need. This doesn't directly benefit me, because increasing supply reduces home value for my wife and me, potentially. But the need is dire, and it's the right thing to do. It's Seattle's turn to show tech we're serious. When we do "build more" they will "come more", and there's the indirect benefit. Option 2 might avoid some junkiness, but the need can certainly justify Option 3. I hope that supporting one or the other of these two doesn't diminish overall support for allowing these buildings. But forced to choose, I would choose 3.

» **Thank you for your comment. The comment is noted.**

Yes, we will have a greater share of rentals with ADU increases. But rentals are apparently what we as a city lack. I would rather have more rentals and fewer homeless around town.

» **Thank you for your comment. The comment is noted.**

## Lara, Myra

Considering both our housing crisis and environmental crisis (sprawl = car dependency = further detriment to our planet), I personally support Alternative 2 with a few caveats. Ideally, duplex/triplex/ garden style apartments are legalized in the entire city, which give amazing flexibility to many household sizes, and would make a lot of Alternative 3 options moot.

Allow more than 1000 sf for family sized units.

Consider FAR limits for single family zones in general (better put, "Residential Zone") in Alternative 2

-OR-

Consider increasing the lot area coverage to 45% when DADU/ADU combo present. That gives a nice possible 1,000sf footprint for both cottage/principal structure for better ground floor accessibility.

No owner occupancy requirement in any alternative. This is a barrier mostly informed by fear and classism without looking into the core of how to dissolve speculation. The majority of Seattlelites are now renters, and many "homeowners" are also "property owners" i.e. own single family homes throughout the city as rental properties.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

Consider either reducing, eliminating or delaying development and permitting costs for low-income people building cottages, but housing in general OR owners/landlords that provide <60%AMI housing costs. We want to encourage these homes.

Find ways to codify smaller lots to encourage diverse ownership.

Allow up to 12 NON-RELATED people in one lot with DADU or ADU present.

- » **Thank you for your comment. The comment is noted.**

Consider renaming "Single Family Zones" as "Residential Zone" to truly transition into a post-climate change, post-fossil fuel world.

Consider reducing the front yard setback to 10' when cottage present (gives both room to breathe/ cultivate green space and trees.)

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

Thank you for tackling this. I'm commenting because I am someone who would love to live in a cottage either on a parcel of land I bought from an owner or a friend. I think the livability of Seattle won't be compromised with the addition of these and more, especially when in today's economy, the "traditional" single family house is not only unaffordable and but also has too much space for the average household. Thank you!

- » **Thank you for your comment. The comment is noted.**

In general, we need better bus and rail services. Remove all parking requirements for DADU/ADU for maximum flexibility.

- » **Thank you for your comment. The comment is noted.**

## Laurie Amster-Burton

My name is Laurie Amster-Burton. I live in a rented apartment on Capitol Hill with my husband, teenage daughter, and our cat. I want more housing for personal reasons: we live near three households of close relatives who are also renters. Our rent, and theirs, goes up every year; I'd like us all to be able to continue living in Seattle. More ADUs in Seattle will help to provide more affordable options for families like ours, and ADUs in more neighborhoods around Seattle means more options for places to live, rather than being limited just to the areas that have apartments right now. I also want more housing for everyone in our city. Working in Seattle Public Schools, I encounter many families who have had to move and change schools due to economic eviction, leaving them unable to find affordable housing in the neighborhood of their children's school. I want the city to streamline the ADU permitting process and make it as affordable as possible for property owners to construct new housing. I do not want an owner occupancy requirement. I don't expect to ever buy a home in Seattle; many others are in my position. As renters we are responsible residents who contribute to our communities.

» **Thank you for your comment. The comment is noted.**

The city should not require parking spaces when accessory dwelling units are built. Required parking takes space that could be open space/green space for gardens and trees. It also encourages people to own cars. As a renter who has traveled by transit and not owned a car for nineteen years, I know that not having a parking space in my apartment building has been instrumental in discouraging me from buying a car.

» **Thank you for your comment. The comment is noted.**

## Lawton, Marsha

This is a personal issue for me, as I have moved to Seattle to be able to provide care for my grandchild. Given the real estate market in the area, it is a stretch financially to maintain an independent residence. The option of living on the property owned by my daughter and son-in-law would relieve both my own financial pressure, but add to their equity and free up the housing I'm using now for someone else. We would certainly be sensitive to environmental issues and be happy to follow city regulations to allow me to be in a home where we are available to care for each other with such great convenience.

» **Thank you for your comment. The comment is noted.**

## Lawton-Crane, Jessie

My name is Jessie Lawton-Crane. I am a mother of one, married in a single-family home. I live in Lake City, and bought my home there because we love the diversity of the residents here. I'm in favor of more housing because, simply put, I want more neighbors! Having rental units available means that my son will grow up surrounded by a wider variety of people, including those who would not be able to afford a single-family home in Seattle. I bought my home assuming that density would increase; I do not want to exclude others from living in my neighborhood.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Lazerwitz, Jay

I support Alt 2, with additional considerations: Elimination of the parking requirement for ADUs regardless of number. Elimination of minimum lot size for ADUs. Striking the owner occupancy restriction. Increasing the size and height allowances.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative would remove the off-street parking requirement and the owner-occupancy requirement.**

Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification.

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes an FAR limit. Please see the analysis in Section 4.1, Housing and Socioeconomics, for a discussion of teardowns and displacement.**

Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence, will make this legislation more effective. Also, not applying the Mandatory Housing Affordability for the 2nd added unit will reduce the development costs for homeowners.

- » **Thank you for your comment. The comment is noted.**

Increasing the size and height allowances will make these structures more useful for the tenants, providing sufficient storage and additional bedroom options. Roofs that include photo-voltaic systems should also qualify for additional height. Also, separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number and size of dwellings that can be constructed.

- » **Thank you for your comment. The comment is noted.**

Having dedicated staff to review ADU/DADUs could reduce the turnaround for permit reviews.

- » **Thank you for your comment. The comment is noted.**

Elimination of the parking requirement for ADUs regardless of number. Providing parking is expensive, often unnecessary as more and more residents do not own cars.

- » **Thank you for your comment. The comment is noted.**

Reducing the sewer hookup charges would greatly reduce the development costs.

- » **Thank you for your comment. The comment is noted.**

## Leckrone, Judith

I strongly support Alternative 2. Our city needs affordable housing and as single family homeowner, I welcome and encourage ADUs and backyard cottages in all neighborhoods - including mine which is Seward Park. We need to reduce the barriers and costs of ADUs and Alternative 2 seems to do that best.

- » **Thank you for your comment. The comment is noted.**

## Lee, Jacob

Every DADU/AADU I've seen has been all but hidden from street view by the main house. There's no aesthetic impact. If anything, what's aesthetically offensive is the 3k sf giant McMansions going in when we can't build multiple reasonably-sized units on a property.

» **Thank you for your comment. The comment is noted.**

I'm strongly in favor of Alternative 2. That provides the lowest barriers to owners adding more housing to our city, which we desperately need, through the addition of AADUs & DADUs, and removing the owner-resident requirement, which improves the ability to get financing to build those units.

» **Thank you for your comment. The comment is noted.**

Street parking is a privilege, not a right. Street parking should not be considered in any zoning decisions. If a property owner wants parking, they can put it on their own property.

Improved sidewalks, bike transit, and public transit options are important, but I believe they can come behind increased resident density.

» **Thank you for your comment. The comment is noted.**

Alternative 3 is not sufficient, Alternative 2 is a great first step to adding density in the SF lots that make up the majority of the city.

» **Thank you for your comment. The comment is noted.**

I think this research is substantial and good, and that Alternative 2 is a good choice with these in mind.

» **Thank you for your comment. The comment is noted.**

Not sure what is meant by Land Use impacts? It's residential land, being put to residential use.

» **Thank you for your comment. The comment is noted.**

## Leed, Roger M.

The ADU proposal was developed without any meaningful effort to elicit neighborhood input and opinions. Neighborhood councils and civic organizations were ignored by the City. This proposal was developed behind closed doors and will produce strongly negative impacts on neighborhoods throughout the City, particularly the lower income areas. Allowing ADU's will attract speculators and get rich quick developers who will see opportunity for profit. They will focus on lower-income neighborhoods with the lowest housing prices. Even if the ADU is built by the homeowner, the effect will be the same: the property will increase in value. The prospective homebuyer who simply wants a family home will have to pay for a home plus an ADU. The City's ideologically motivated program, proclaimed to increase affordable housing, will do just the opposite. The sharp operators will snap up available affordable "starter houses" and the families looking for such homes will lose out. The sharp operators will build to the maximum density to add a rental housing income stream, and then resell to make a profit. The City's intent is easily skirted: developers can live in the house for a short time, then sell and move on. The neighborhood will lose stable long-term residents who will be outbid by developers. The higher value former single-family house, now an income property, will move the neighborhood toward gentrification. Increasing the population in single family neighborhoods will have numerous adverse impacts, depending on area. Can the schools handle the new students? Are there enough parks and libraries to serve the needs of the higher population? Are there sidewalks and safe streets to walk and ride bicycles? Is there adequate healthy food shopping supply within reasonable distance? Is the

transit service adequate to handle the increased demand? Are there enough police and fire resources to handle the larger population? Who is going to pay to meet these needs and where will the money come from? Why hasn't the City fully analyzed these impacts? That analysis requires projecting probable population increases by neighborhood, listing the City and other public services that will be degraded, and the adverse impacts on existing residents, and estimating whether these impacts can be avoided or mitigated. If mitigation is possible, how much will it cost and how long will it take and who will pay for it?

- » **Please see Section 4.1, Housing and Socioeconomics, for a discussion of potential impacts on affordability as well as a discussion of estimated ADU production and number of tear downs by neighborhood profile. In addition, please also see Section 4.4, Parking and Transportation, for a discussion of transportation and Section 4.5, Public Services and Utilities, for a discussion of impacts on public services and utilities.**

This misguided proposal will decrease the supply of affordable single-family housing. It will significantly increase the population of short-term renters in single-family neighborhoods with insufficient City services and improvements, thus adversely affecting the quality of life for all residents. Renters with children will further overcrowd City schools. Many neighborhoods have almost no available on street parking because the streets are narrow and there are numerous curb cuts. Renters with cars will cause parking problems for all residents. Transit service is spotty and not close in many areas. If people can't get to work they can't pay the mortgage or the rent. The EIS ignores or minimizes these impacts because it is trying to justify ADU's instead of doing what the law requires, analyzing impacts objectively.

- » **Please see Chapter 3, History and Planning Context, for a discussion of the City's short-term rental regulations and Section 4.1, Housing and Socioeconomics, for information about how we considered short-term rentals in the analysis. Please also see Section 4.5, Public Services and Utilities, for a discussion of impacts on school capacity.**

ADU's are a gift to property speculators and developers, and will undercut the viability and livability of all Seattle neighborhoods. Seattle's strong single-family neighborhoods are its' most outstanding residential feature, These span the whole range of family incomes and ethnic groups. To harm these in order to serve an ideological objective that has been pushed by policy theorists cheered on by development interests would be a mistake that could never be corrected.

- » **Thank you for your comment. The comment is noted.**

## Leibrand, Scott

This analysis comprehensively demonstrates that neither alternative 2 nor 3 would significantly worsen on-street parking availability, and therefore parking and transportation issues should not prevent moving forward with the proposed zoning changes.

- » **Thank you for your comment. The comment is noted.**

Overall, this EIS does an excellent job demonstrating that marginal changes in the direction of allowing additional infill development of Seattle's single-family residential zoned neighborhoods would be almost entirely beneficial, with marginal improvements on housing availability and affordability, and negligible negative impacts on land use, parking, transportation, or public services. I would encourage the city to adopt alternative 2, and then consider further changes to support additional infill development of duplexes, triplexes, and even apartments in denser areas (those near transit, and where significant numbers of multi-unit attached buildings already exist in single-family residential areas).

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

Alternative 2 seems like the most suitable of the proposed alternatives, as it would encourage the most production of much-needed new housing units, improve housing affordability, and maximize flexibility to respond to changes in market conditions.

» **Thank you for your comment. The comment is noted.**

None of the land use changes contemplated here appear problematic in any way. The anticipated land use actions spurred by alternatives 2 and 3, appear to be quite compatible with the nature of Seattle's single-family zones, and in fact would appear to be beneficial in encouraging infill development consistent with current neighborhood character and discouraging tear downs that would place expensive neighborhoods even more out of reach of most Seattle residents.

» **Thank you for your comment. The comment is noted.**

The impacts of both alternatives 2 and 3, but especially alternative 2, are positive overall compared to alternative 1. I appreciate the focus on continued marginal improvements to improve housing supply and affordability.

» **Thank you for your comment. The comment is noted.**

### Levine, Al

As a homeowner in the Green Lake Neighborhood I support significant liberalization of the ADU requirements in order to create as many units as possible. If that ends up with three units on every residential lot, great. I lost support the elimination of off street parking requirements in all single family zones. Costco garages and two cars per household are not a sustainable strategy for our city or our planet.

» **Thank you for your comment. The comment is noted.**

### Lewis, Adam

I support Alternative 2. I would prefer that there be some requirement that the owner occupy the property for a period after the ADU is built, but no requirement is preferable to a long-term requirement.

» **Thank you for your comment. The comment is noted.**

### Lindenbaum, Kathleen and Jeffrey

Alternative 2 and 3 are premature proposals without adequate planning or justification. And as such, are not acceptable proposals by the city - at this time.

» **Thank you for your comment. The comment is noted.**

Alternative #1 should be chosen. In the same way that the "so-called Headtax" came before a thorough explanation of how taxes would be used, there is no compelling reason(s) stated for this proposal. Currently property owners are building ADUs throughout our neighborhood of Queen Anne, and throughout the city in our friends' neighborhoods. In addition, if the proposal cannot produce a "comprehensive impact summary" about neighborhoods (because they're too diverse for such a summary - my reading), this is a super important reason not to act. To approve Alternative 2 or 3 would be a significant lack of responsibility on the part of City governance.

» **Please see the frequent comment response regarding individual neighborhood review.**

There have already been enough studies to support Alternative #1, and a thorough study of future services and utility needs. Current documentation indicates there is no plan in place to meet current needs, let alone future needs that have not been well documented.

- » **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

## Linn, Jeffrey

My name is Jeffrey Linn

I live in Wallingford

I have a 12 year-old daughter. I am concerned about her ability to live in Seattle when she grows up.

We need a much wider variety of housing options than is currently allowed in Seattle.

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

### Loe, Laura, volunteer organizer with MOAR

My name is Laura Loe Bernstein. I'm a U District renter that lives with two roommates in a single house and I live in the basement. I'd love my own kitchen downstairs and have this be an official ADU. I make music and we musicians love basement ADUs! Please make the changes our city needs to have more housing choices for aging in place, intergenerational living.... making it easier and cheaper to build cottages and granny flats are the bare minimum changes we should be making during a housing and climate crisis!

As part of the group MOAR we are recommending the following for the final EIS:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures. This is a way to help folks save money!
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage. Do we have a car storage - crisis vs a people need housing and our climate is changing too fast- crisis?
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings. Don't side with anti-renter neighbors. RENTERS MAKE GREAT NEIGHBORS, TOO!
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots

fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Thanks for taking the time to consider my recommendations!

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

There is enough parking in Seattle compared to most other cities I've lived in. We need to stop prioritizing this in our decision making.

- » **Thank you for your comment. The comment is noted.**

Thanks for this work.

- » **Thank you for your comment. The comment is noted.**

I'm frustrated this is even a consideration in a housing crisis and a climate crisis.

- » **Thank you for your comment. The comment is noted.**

The Sewage Canard shouldn't be a reason to stop people from having housing.

- » **Thank you for your comment. The comment is noted.**

## Lui, Henry

I strongly support proposal #2 due to the calculation of 1000sqft excluding garage and storage space. If proposal #2 is not chosen, it will not be feasible to build an ADU unit on my property.

» **Thank you for your comment. The comment is noted.**

## Lunden, Zach

I strongly support reducing the restrictions on ADU's and DADU's. I would like to see the requirement for setbacks eliminated. I would also like to see higher FAR's, height limits, and total square footage allowances for ADU's and DADU's. Parking should not be required for any of these, and there should be no limit on short term rentals or requirements for owner occupation of any structures.

» **Thank you for your comment. The comment is noted.**

## Lustig, Ankrom Moisan Architects

The historic neighborhoods with the older house will have a complete identity loss at the expense of developers.

» **Please see Section 4.2, Land Use. This chapter has been updated to include a discussion of historic resources.**

## Lustig, Kurt

I think that there should be neighborhoods preserved as single family communities as many other cities have done. We have historic homes being torn down everyday for profit, and this will too become a money game. Lofty expectations of creating more housing is not why people will be participating--at the expense of the neighborhood's identity.

» **Please see Section 4.2, Land Use. This chapter has been updated to include a discussion of historic resources.**

I'm not for cramming more houses into less space. QA already has densities that are high.

» **Thank you for your comment. The comment is noted.**

This will be a "for profit" movement--people with lots not big enough to participate will lose value on their homes and have to deal with issues were part of the reason they bought in the neighborhood to begin with (e.g traffic etc)

» **Thank you for your comment. The comment is noted.**

I'm 100% against this and intend to take legal action if needed to protect the integrity of our neighborhood. This will be a lengthy process for the city.

» **Thank you for your comment. The comment is noted.**

This will be a disaster. Parking is becoming harder already at current densities. Traffic has become dangerous on neighborhood streets already due to the increasing populations commuting from the eastside to the waterfront. Please see for yourself during rush hours and mid-day weekends.

» **Thank you for your comment. The comment is noted.**

Our utilities already are antiquated. A full upgrade will be required, paid by the embedded single family tax payer w/o any gains. The developers and new families utilizing the ADU will have the only gains.

- » **Staff from Seattle Public Utilities have been involved in the review of the EIS. Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

## Lyles, Lizabeth

I don't care which of the options, I'm fine w/ more ADU's & also apts w/in the home, either/or/both. We need more housing, not rent control or penalizing landlords. BUT, you need to require at least 1 parking spot for the home if there is extra housing. It's probably not as crucial here, but the city is "gave away the farm" not requiring parking in new developments. Another 22 unit went in w/ ZERO parking near here, penalizing existing homeowners. Now the mayor wants to charge tolls since now due to crowded streets (w/ all the tenants who don't have spots now occupying them). Let alone the unused bike lanes. We need more parking, not less!

- » **Thank you for your comment. The comment is noted.**

## MacAdam, Matthew

I share the concerns (noted in the EIS) that parking will be an issue in certain neighborhoods. I think the EIS underestimates the potential problems, though--certain neighborhoods are already maxed out on parking, and Metro transit is not doing a good enough job yet that Seattle is really liveable without a car. Metro needs to step up it's game for this to really work. Transit works better with density, so perhaps this will work itself out, but Metro's track record is not great.

- » **Please see the frequent comment response concerning impacts to parking.**

Alternative 2 is better, if no other reason than that the current rules that include garage/utility space in ADU square footage discourage property owners from using the lot coverage from their existing garage for a DADU. Folks don't want to give up their garage. Under alternative 2, property owners can basically just throw an apartment on top of their garage--no increase in lot coverage, no real environmental impacts.

- » **Thank you for your comment. The comment is noted.**

## MacArthur, Rob

Accessory dwellings are a necessary step, whatever their impacts might be.

- » **Thank you for your comment. The comment is noted.**

This concern is irrelevant compared to the scale and severity of the housing crisis.

- » **Thank you for your comment. The comment is noted.**

This concern is irrelevant when weighed against the scale of the housing crisis.

- » **Thank you for your comment. The comment is noted.**

## Magula, Claire, Bellwether Housing

I cannot wait for the City of Seattle to make building ADUs more accessible and easy. I'm encouraged by cities, such as Portland, that have had huge increases in ADUs built after changing the regulations. Seattle needs every possible unit of housing that can be built here and MUST take every action possible to make it easier to build a diverse range of housing options. I personally would love to live in an ADU and one day hope to even own a home with one. This gives renters and homeowners more choices about affordable places to live. Densify-ing our single family zones in particular is a critical way to help manage population growth that might alleviate some of the burden urban villages have been carrying as the centers of urban density growth. We need to utilize ALL our housing resources and tools and ADUS are a fantastic way to do that.

» **Thank you for your comment. The comment is noted.**

I am in favor of Alternative 2. We should maximize ADU production. We need every unit of housing we can get.

» **Thank you for your comment. The comment is noted.**

I am in favor of Alternative 2. We cannot limit home building because of parking; we need to reduce single-occupancy car driving and continue to expand transit.

» **Thank you for your comment. The comment is noted.**

## Mann, Amy

One of the joys of living in the city, in an urban area, is public transportation and NOT having to deal with traffic as the driver of a single- or low-occupancy vehicle. More folks should embrace that. The savings of not owning and garaging and servicing a car are not insignificant and the peace of mind is worth a lot.

» **Thank you for your comment. The comment is noted.**

ADUs will allow more housing without the building density of high rises; a compromise between single-family only (which is not forward-thinking) and high rises everywhere which can be a bit much. Remember when cities developed row houses which provide higher density than single-family neighborhoods???

» **Thank you for your comment. The comment is noted.**

Again, ADUs offer a transition from single family homes to higher density without having to go the route of high rises.

» **Thank you for your comment. The comment is noted.**

Change is something we should all embrace and ADUs offer a tweaking of the single family neighborhood toward row houses and town houses and garden apartments without a drastic upset of the look of the single family neighborhood.

» **Thank you for your comment. The comment is noted.**

The more diversity the better; neighborhoods that become mono-cultures don't build as vibrant a community as diversity; diversity of age, income, ethnicity, etc. are all important parts of a vibrant community.

» **Thank you for your comment. The comment is noted.**

With enough civic will public services and utilities can be adapted to deal with ADUs.

- » **Thank you for your comment. The comment is noted.**

## Mar, Sibyl

Alternative 2 is preferred

- » **Thank you for your comment. The comment is noted.**

## Marcum, Luke

Adopting Alternative 2 will help increase housing affordability throughout the city. This will help reduce the number of restrictions placed on property owners that could benefit from another rental unit on their property. Homeowners across the city are suffering from increased cost of living every year. With the help of a DADU/AADU's rental income, it helps prevent these homeowners from being priced out of the city.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 would help increase the quantity of smaller rental units in residential areas closer to the city's core. The current code tends to favor properties away from urban cores rather than closer to busier urban centers. The current land use code restricts certain people from having the opportunity to construct a DADU/AADU. By adopting action 2, it gives people with more property restrictions the option to add another unit within their property.

- » **Thank you for your comment. The comment is noted.**

## Mark, Jonathan

I agree with the DEIS' conclusions that Alternatives 2 and 3 would not create significant adverse environmental impact.

I appreciate the background information this DEIS provides, showing that Seattle's zoning has become more restrictive since 1923, creating widespread single-family areas which are relatively unaffordable, less accessible to the non-white population, and have failed to absorb any of Seattle's 17% population growth between 1970 and 2010.

Allowing increased ADU's is a small but necessary step and I am grateful for this report's thoughtful analysis.

- » **Thank you for your comment. The comment is noted.**

## Marris-Swann, Anthony, City of Renton

Cities are for people, not cars. No new parking.

- » **Thank you for your comment. The comment is noted.**

Aesthetics are important, providing housing is more important

- » **Thank you for your comment. The comment is noted.**

Benefits of increased density outweigh costs

- » **Thank you for your comment. The comment is noted.**

Build housing faster to bring costs down

- » **Thank you for your comment. The comment is noted.**

Yes, make the process as simple as possible

- » **Thank you for your comment. The comment is noted.**

## Martinez, Ian

We are in a housing emergency. The City should take action immediately to allow up to two ADUs per lot, without any onerous restrictions, such as parking or occupancy requirements. The City should allow for the maximum proposed number of unrelated people (8) and an unlimited number of related people on lots, while square footage limits should exclude garage and storage areas, which are clearly being used as a "loophole" to prevent development.

Please use this opportunity to take bold action and stem the housing crisis, while moving our city into the new century.

- » **Thank you for your comment. The comment is noted.**

My name is Ian Martinez; my household is made up of myself and my partner. I live in Capitol Hill. I want more housing because right now, the dream of ownership is slipping away from middle class people like me; simply affording rent is slipping away from my blue collar brothers and sisters; lack of housing means more and more people have to sprawl out into surrounding cities, which is bad for congestion, traffic, civic harmony, and the region generally.

- » **Thank you for your comment. The comment is noted.**

While homeowners value aesthetics, the look and feel of a house is not something I believe the city or even neighbors should be able to determine at the expense of a homeowner's autonomy. A neighborhood's character is determined by the people who live there, by the arts and culture created there, by the shops and commerce offered there, not by what the buildings look like. To quote a famous urban planner "if your neighborhood character depends on how the buildings look, you don't have a neighborhood; you have a theme park."

- » **Thank you for your comment. The comment is noted.**

The existing ban on apartments across nearly two thirds of the city produces extremely class-biased outcomes; perpetuating it through a ban on ADUs generally and the owner-occupancy requirement specifically is therefore classist by definition. Renters are shown to make good neighbors and class diversity is proven to benefit neighborhoods.

- » **Thank you for your comment. The comment is noted.**

I strongly urge the city NOT to require any parking. Parking requirements make building new housing incredibly difficult and sustain our city's unhealthy addiction to cars.

- » **Thank you for your comment. The comment is noted.**

## McConachie, Anders

I appreciate and support either of the alternatives (2 or 3). However I think greater moves/impacts need to be made. Density is important to Seattle, while also having the freedom to have a single family dwelling. Allowing home-owners to build AADUS/DADUs and also have the option for movable ADUS. Appendix Q needs to be adopted in Seattle( <http://www.ecobuilding.org/code-innovations/policy-profiles/2018-tiny-house-appendix-to-residential-code/tiny-house-appendix-q-as-proposed>) with allowances for movable tiny houses, and alternative eco-friendly options such as compostable toilets and gray water systems. Also residential uses for small parcels of land that are too small to develop. As someone who wants to make Seattle my long-term home, but has no hope of owning a house or condo, DADUs/movable ADUs are my best option.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

I support alternatives 2 and 3. I would also ask that there be allowances made for AADUS/DADUS to use things such as movable tiny houses, composting toilets instead of plumbed toilets, and graywater systems.

- » **Thank you for your comment. The comment is noted.**

DADUs/ADUs would preserve the existing look and feel of many neighborhoods as many of these structures wouldn't be visible by the street while also increasing density. Movable tiny houses should be allowed in order to allow someone to own the tiny home, but move it to various backyards as the host families buy/sell houses. This allows for the tiny house owner to own a house, but still have flexibility within the city if the property is bought/sold by the main homeowner, without the investment of the permanent AADU/DADU.

- » **The proposal evaluated in this EIS focuses on proposed changes to the Land Use Code for the construction of ADUs. Modifying what constitutes a single-family dwelling by removing the requiring that the structure has a permanent foundation is outside the scope of this EIS.**

Many people see established trees as beneficial to property values in single family homes. Another option would be to take smaller land parcels that are too small for development and ensure they have electric and water utility service to allow for smaller dwellings to be developed to also increase density.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to zoning are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

There could be an option where homeowners (empty nesters, retirees) move into an DADU/AADU and rent out the larger main house. This would lower their need for upkeep, supplement a limited income, potentially provide community and support, and avoid displacement or the need to move into a retirement community for longer. Current permitting system is not cost effective/ easy enough for many people to attempt. There is more incentive just to sell.

- » **Under existing regulations, the owner-occupancy requirement allows an owner to live in either the ADU or the main house. If the owner-occupancy requirement was maintained, as described in Alternative 3, an owner could still live in either ADU or the main house.**

## McKay, Ali

My name is Ali McKay.

My household is made up of 4 people plus an ADU with 2 more.

I live in District 43.

I want more housing because increasing housing density it is vitally important both for the environment and for equitable and just housing. Obviously, we have a lot of people moving to the city, and the increase in housing prices is directly adding to our homelessness crisis. Adding accessory dwelling units can help people on fixed incomes afford to stay in their homes. I also think that single-family home zoning perpetuates previous racist practices such as red lining and restrictive covenant”s based on race. We need to undo that, and one way to start doing so is to increase density.

» **Thank you for your comment. The comment is noted.**

### McMahan, Kevin

I am writing in strong support of Alternative 2 in the Draft EIS published on May 10. I believe it best leverages current single family zoning to increase density in a manner that maximizes property owners' discretion and respects neighborhood character. We have a very large lot in north Seattle with a very narrow easement to access the rear lot. The flexibility of not requiring owner occupancy offers a great incentive for development and use of such units for owners. Removing the requirement for off-street parking would also fit our neighborhood since running a driveway through a narrow easement to a large back lot such as we have on our property might be unnecessarily disturbing to renters of the current house and neighbors to the south. It is also possible that renters be Metro commuters since express buses to the UW are in easy walking/biking distance from our property.

» **Thank you for your comment. The comment is noted.**

### mcmillen, sam

I've been exploring the option of building a dadu but the current restrictions are making it too costly to make financial sense. Please increase the square footage to 1000' increase the rear yard coverage to 60% and remove the owner occupancy requirement. and I will build a dadu asap and help out with the housing issues seattle is facing.

» **Thank you for your comment. The comment is noted.**

I've been exploring the option of building a dadu but the current restrictions are making it too costly to make financial sense. Please increase the square footage to 1000' increase the rear yard coverage to 60% and remove the owner occupancy requirement. If you do this I will build a dadu asap and help out with the housing issues seattle is facing.

» **Thank you for your comment. The comment is noted.**

### Mengstu, Asrade

I own an AADU in Leschi, and I very much support Alternative 2. I think homeowners with an ADU should be given the choice of renting out their entire house (both the main house and the ADU) if they choose to do so. Tying them to their house because of the ADU is one of the reasons people shy away from building an ADU in the first place. I support the elimination of the homeowner occupancy requirement.

» **Thank you for your comment. The comment is noted.**

## Merkle-, Michelle

I like the direction we're going with these alternatives. Agree that min. lot size of 3200 s.f. is wise. I like the idea of extending area to 1,000 sf, excluding garage and storage areas. Would you also consider including mechanical spaces? Are mechanical spaces part of a storage area? Wondering if there could be even greater height flexibility in the alternatives.

I notice that the DADU sketches/representations tend to hide the structure behind the main house. Instead, I would like to be able to announce a beautiful structural, along with functionality, versatility, great design, and many sustainable aspects. If I were able to raise the height limit by 3-4 ft., I could create a structure that is close to the same height as my current home, and allow for railing for a rooftop deck, which would have views on all sides, including a view of the ball park across the street (a view my husband and I have enjoyed from our home for many years, and would like to make available for the cottage, as well).

The extra height would also allow for an elevator addition (in 10 years) which would extend to the rooftop deck. We plan to retire in the DADU, eventually, and like the idea of building accessibility/aging in place options into the design. I wonder if I designed a home that more than met (and on many components exceeded) standards, and could show benefit to my building design (solar, heat pump, green roof and green deck, water catchment system, shed roof, and green, local materials + a well-insulated structure) with a list of economic benefits (versatile area- 7 minutes to downtown, across street from 16-acre park, 5-minute bus ride to the UW, etc.), if you would consider reducing the structure height limit.

In one alternative, there's mention of height limit restriction excluding things like 'dormers that add space' (not an exact quote). I believe my overall design (which has no dormers) makes great use of space-with no wasted areas. My DADU design is an example of how you can do alot with 1,000 sf, and preserve green space, have minimal impact, and add tremendous beauty to the neighborhood. Hoping you would consider one exception (height limit) with my design. In addition to the above points, I think the DADU would looks better if it were the same height or slightly higher than my current home height (2 stories w/ semi-lit basement).

Thanks for your time and energy.

Michelle Merkle

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

## Messier, Judie

I support Alternative 2 WITH THE FOLLOWING EXCEPTIONS: (1) Off-Street Parking Requirements should be Alternative 1 or Alternative 3; (2) Owner-Occupancy Requirements should be Alternative 1 or Alternative 3; (3) Predevelopment costs: I suggest that Seattle follow the lead of Portland, OR which on May 3, 2018 permanently waived their system development charges on their ADUs. This will strongly incentivize those who are considering constructing an ADU or DADU.

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. Please see Chapter 2 for a description of what is included related to reducing costs, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

There should be an off-street parking requirement, equivalent to Alternative 1 or Alternative 3.

- » **Thank you for your comment. The comment is noted.**

ADUs and DADUs can only be an improvement on the UGLY multi-unit buildings that developers are constructing everywhere, that look like cardboard boxes with windows, and do not in any way match the character of the extant neighborhood..!!

» **Thank you for your comment. The comment is noted.**

## microhouse

There is already a parking waiver system which allows for conditions where the cost to add parking is expensive or otherwise infeasible. If we are serious about building equitable communities we shouldn't be cavalier about parking. Those who depend most on cars are the working poor and families with children. More than others, the working poor don't have the luxury of having just one job in an urban center served by transit. They need a car to get to multiple jobs in dispersed locations, often in off hours. Similarly, it is virtually impossible for families with young children to function in Seattle without a car.

» **Please note that the existing regulations do not allow a parking waiver due to financial constraints. The Director of the Seattle Department of Construction and Inspections may waive the off-street parking space requirement for an ADU if: the topography or location of existing principal or accessory structures on the lot makes provision of an off-street parking space physically infeasible; or the lot is located in a Restricted Parking Zone (RPZ) and a current parking study is submitted showing a utilization rate of less than 75 percent for on-street parking within 400 feet of all property lines of the site.**

Special consideration should be given to alley and corner lots to handle increased density.

» **Thank you for your comment. The comment is noted.**

Comment by Alternate:

1. Number of ADU's on a lot: Alternative 1 no action or Alternative 3 Allow an ADU and DADU on lot while maintaining the owner occupancy covenant.

DADUs built under current land-use 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.

2. Parking: Remove parking requirement for ADUs. Alternative 1: no action.

There is already a parking waiver system which allows for conditions where the cost to add parking is expensive or otherwise infeasible. If we are serious about building equitable communities we shouldn't be cavalier about parking. Those who depend most on cars are the working poor and families with children. More than others, the working poor don't have the luxury of having just one job in an urban center served by transit. They need a car to get to multiple jobs in dispersed locations, often in off hours. Similarly, it is virtually impossible for families with young children to function in Seattle without a car.

3. Owner Occupancy: Alternative 1 or Alternative 3

The EIS looks at the effects of removing the requirement all together for the sake of studying the impacts. The original 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 DADUs used short term rentals.

4. Reduce minimum lot size: Alternative 3

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 3

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.

6. Additional Height: Alternative 1 (no action)

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 neighboring 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 wanting higher height limits.

7. Lot coverage Limit: Maintain.

Recognizing that yards do have a value both for families raising children and as green spaces and as a way to reduce stormwater runoff.

8. Rear yard coverage alternate: Increase to 60% (Support):

The proposed changes don't actually increase the total amount of lot coverage allowed.

9. Rooftop features alternate (Support):

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 therefor have no environmental impact but will facilitate good design.

10. Location of entry alternate (Support): the alternative to allow entries located facing the nearest lot line as long as the entrance is located 10 ft or more away.

11: Maximum Household Size: No change, Alternate 1 or 3

Alternative: increase the household size along with maintaining owner occupancy requirements.

12: MHA fees would apply when an owner applies for a second ADU.

MHA fees will discourage the creation of additional units. It would seem better to require that additional units, if allowed, meet affordable housing guidelines.

13: Reduce pre-development costs by 10%.

SDCI can start by assigning a designated reviewer for DADUs which will eliminate inconsistencies and streamline the review process saving both time and money.

Additional alternative: SDCI can waive fees for DADUs with affordable housing criteria.

14. Introduce a maximum FAR ratio: Alternate 3

This is a big introduction into the EIS study. Currently, the FAR is not restricted in single family zones and size is restricted by setbacks and lot coverage. As shown in the EIS introducing an FAR limit will increase the number of smaller more affordable houses being built and reduce the destruction of naturally occurring affordable housing.

- » **Please see Section 4.1, Housing and Socioeconomics, for a discussion of impacts due to removal of the owner-occupancy requirement. The analysis shows that under all action alternatives, the number of demolitions will decrease. Please also see the frequent comment response concerning impacts to parking.**

The EIS provides a useful tool for community members and the city to evaluate the impacts of growth in residential neighborhoods. The information gathered can and should be used shape policy in our changing city. Given the information presented, we support Alternative 3 with its emphasis on maintaining the scale of existing development in single family residential zones. Most importantly the EIS finds that Alternate 3 will reduce the amount of natural occurring affordable housing lost to redevelopment. We feel that a moderate pace of scaled growth will lead to more equitable and environmentally sustainable Seattle that maintains a strong sense of place.

- » **Thank you for your comment. The comment is noted.**

Backyard cottages are a great addition to our city providing the low hanging fruit for increasing urban density while providing housing opportunities for families. The EIS study finds that backyard cottages increase housing options in areas that are deemed to have the highest access to opportunity. In fact we see this trend on an ongoing basis. A majority of the cottages we design (greater than 10% of Seattle DADUs to date) are being built as rentals. And while the cost of construction is relatively uniform across the city, rental rates vary greatly. As a result, the return on investment is higher for a cottage built in a more desirable neighborhood with higher rental rates.

As rental rates have increased so to have the number of backyard cottages built. Current rates of production are close to 150 new DADUs per year. The EIS analysis finds that Alternate 1 (no action) would result in the production of 1,890 new DADUs, Alternate 2 (representing the broadest range of changes) would result in 1,820 new DADUs and Alternative 3 would result in 1,705 new DADUs being built in the next ten years. It is interesting to note, that of the alternates, the highest number of DADUs would be produced under Alternate 1 which represents no change to the current land use code. The increase in number of AADUS under the proposed alternates seems to come from the removal of the owner occupancy covenant and the allowance of an additional ADU.

Allowing three units especially in combination with the removal of the owner occupancy requirement will lead to SFRs designed and built to be congregate rentals (not well suited to families) 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. This is borne out by the draft EIS results. 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.

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative, which would eliminate the owner-occupancy requirement, and Section 4.1, Housing and Socioeconomics, which analyzes removal of the owner-occupancy requirement.**

While a majority of the code changes are geared towards DADUs, it is interesting to note, that of the alternates, the highest number of DADUs would be produced under Alternate 1 which represents no change to the current land use code. Given those results, it would be hard to argue that the proposed changes are necessary to encourage DADUs.

The rate of AADU construction is scheduled to increase as a result of the changes in Alternates 2 and 3. Of these, the primary impact appears to be increasing the number of ADUs allowed per property. Alternate 3 does this while maintaining the owner occupancy requirements. Alternate 2 only marginally increasing the amount of ADUs built. However, removal of the owner occupancy requirement (Alt 2) will decrease inventory for home ownership, increase the loss of naturally occurring affordable housing through redevelopment, and encouraging speculative development from out of area investment groups.

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative, which would eliminate the owner-occupancy requirement, and Section 4.1, Housing and Socioeconomics, which analyzes removal of the owner-occupancy requirement.**

Stormwater: The EIS study is not adequate. Simply stating that the maximum allowable lot coverage is not increased under the proposal does not mean that there is no impact to increasing development in single family neighborhoods. Most ADU and DADU projects are under the drainage review threshold so do not provide any on site storage or mitigation. Seattle does not limit the amount of impervious surface or require stormwater management for projects that create less than 1,500 sf of new impervious surface. The result is that the impervious surface for a lot with a new backyard cottage could be 65%, or more for a small lot.

Increasing development in single family zones 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 maintain vegetation and 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. No funding source is identified in the draft EIS for increasing capacity for stormwater management.

- » **Thank you for your comment. The comment is noted. Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

## Miller, Chad

Remove parking requirements. Single car culture isn't sustainable and transportation infrastructure has shifted to transit, pedestrian, and bike based.

- » **Thank you for your comment. The comment is noted.**

## Miller, Krystal

I enthusiastically support Alternative 2 for changes to the rules around ADU and DADU development in the city of Seattle. The removal of a parking requirement, the repeal of the owner-occupancy requirement and the easing of other existing restrictions would help to create a variety of housing types for our diverse population, many who may be forced to leave to keep their housing costs a reasonable part of their spending.

Alternative 2 would provide an option for those who would like to provide nearby housing for senior or disabled family members they would like to care for while allowing the dignity and independence for those individuals to have their own space and privacy. This is something my husband and I frequently discuss as my parents age out of the ability to care for my brother with autism--this is one way we could provide care for him and still allow them the ability to care for his own space and maintain his right to privacy.

The easing of the owner-occupancy requirement would also create more housing options for those who wish to own real estate as part of their business or estate, but for various reason are not able to live in Seattle. It gives more freedom for those who need or want to leave the city to open their home to renters without needing to sell their home, possibly reducing the housing supply should the future owner not rent out units on the property.

The removal of the parking requirement is simply common sense for a rapidly urbanizing city during a critical moment in our local and global environment. Parking requirements also keep the cost of housing higher, and also would prevent units from being build on properties that aren't able to provide off-street parking.

» **Thank you for your comment. The comment is noted.**

Thank you so much for considering changes to the existing ADU requirements to help lower the cost of housing and increase the availability and type of housing for those who currently live, and want to live, in Seattle. I am a single-family homeowner, who owns a personal vehicle, with ADU's on my block, and support the work by the City of Seattle to increase housing choices in Seattle.

» **Thank you for your comment. The comment is noted.**

## Miller, Scott

I'm so please to see the City of Seattle making progress on bringing common sense reforms to the development of housing options that integrate with existing single family zoned neighborhoods. This is especially important with the context of the fight over low income housing costs and proposed taxes. The Queen Anne Council's fight against this common sense reform reflects the worst aspects of NIMBYism in our City.

» **Thank you for your comment. The comment is noted.**

## Mitchell, Ben

In general the DEIS shows that the action alternatives have substantial "breathing room" for causing any adverse impacts. This suggests that rules could be further relaxed without risk. Most importantly, the city should analyze allowing three ADUs per lot. Analysis could be simplified by assuming an upper-bound of 50 percent increase in ADU production. The city should also analyze a lower minimum lot size for DADUs (2,000 ft<sup>2</sup>), an allowance for two DADUs, an increase in the maximum size for AADUs (at least 1,500 ft<sup>2</sup>), and removal of limits on the number of unrelated occupants.

Thank you for the opportunity to comment.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

The DEIS demonstrates that the proposed ADU rule changes under either action alternative would have no significant adverse impacts on communities. I believe that the DEIS supports the broadest range of changes to the land use code, and therefore I strongly support Alternative 2 rather than Alternative 3.

Alternative 2 updates Seattle's existing ADU regulations in all the most important ways to allow more homeowners to construct these much-needed, flexible homes:

- allows two ADUs per lot
- removes all off-street parking requirements
- lowers the minimum lot size for detached ADUs from 4,000 to 3,200 ft<sup>2</sup>
- removes the owner occupancy requirement
- raises the occupancy limit on unrelated people from 8 to 12
- relaxes various size restrictions for detached ADUs

For the final preferred alternative, I support Alternative 2 as proposed, with the following modifications:

1. allowance for two attached ADUs (as in Alternative 3) or two detached ADUs, or one of each
2. minimum lot size of 2,000 ft<sup>2</sup> for detached ADUs
3. increase in maximum height of three feet over the existing limit, regardless of lot width, for detached ADUs
4. increase in maximum height of two additional feet for projects with green roofs or those pursuing the city's "Priority Green" program
5. maximum size limit of 1,500 ft<sup>2</sup> for attached ADUs
6. removal of the occupancy limit on unrelated people
7. allowance for placement of a detached ADU in a lot's front yard or side yard
8. removal of all restrictions on the location of entries for detached ADUs

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Monteleone, Rebecca, Sierra Club Seattle Group

Dear Ms. Pennucci,

Thank you for the opportunity to comment on the draft Environmental Impact Statement regarding Accessory Dwelling Units (ADUs). The Sierra Club strongly supports policies that will allow for more ADUs, especially by reducing barriers to their construction.

Sierra Club supports Alternative 2, along with a preference for one provision from Alternative 3. Alternative 2 represents the most improvement in adding to supply of ADUs, and has the greatest

potential for the city to make progress in sustainability and affordability. We also support the Alternative 3 provision that allows construction of a second attached ADU as a substitute for a backyard cottage. The minimum lot size assessed in the Draft EIS for adding an ADU should be reduced below the 3,200 square foot area which was considered. We suggest reworking the pertinent analyses using a 2,500 square foot minimum lot size in the final EIS.

ADUs and DADUs represent greener, more affordable housing and give owners more flexibility. ADUs and DADUs can support large or intergenerational families who have outgrown their existing home or whose elders have moved in with their younger relatives. They can provide an opening for a young family to buy a home and offset their mortgage through rental income--allowing them to build equity in a difficult market. ADUs and DADUs are also more sustainable. Smaller homes generally use less energy and have a smaller climate impact. They also allow for more urban density, which reduces sprawl and the destruction of the environment. And by reducing commute times, carbon emissions are also reduced.

One reason Sierra Club strongly supports Alternative 2 is because it eliminates the requirement for off-street parking when building ADUs and DADUs. Overall, the EIS finds that ADU production would not have an adverse impact on the availability of on-street parking. In cases where the City anticipates minor impacts (>85% of street parking capacity is utilized), parking strategies such as providing secure bike parking, subsidized transit passes for ADU residents, and subsidized ride or car sharing access should be required as mitigation for local parking impacts. Single-occupancy vehicles cannot be the future if we are going to combat climate change and manage traffic in a vibrant urban area. Requiring ADUs to have off-street parking is a tremendously limiting factor that will only prevent their development while solidifying reliance on single-occupancy vehicles.

The projected number of new backyard cottages would cover "less than 0.1 percent of the total tree canopy in single-family residential areas" according to the EIS analysis. We especially support having no off-street parking required for ADUs given the EIS finding that, "removing the off-street parking requirement could reduce the amount of vegetation and tree removal otherwise needed to accommodate a parking space when creating an ADU."

We also believe that the development of more ADUs is an equitable solution that represents our works in centering equity, justice, and inclusion. Alternatives 2 and 3 both represent fewer physical teardowns, and thus less physical displacement, than taking no action. Projections for Alternative 2 lead to fewer teardowns than does the status quo because making it easier to build ADUs shifts the financial benefit away from teardowns in many cases. And, as detailed above, ADUs also present opportunities for intergenerational and/or large families. Additionally, creating more living units is one factor that mitigate the increase in housing prices, since supply does not currently meet demand.

The Sierra Club urges the city to adopt Alternative 2 and expand housing choices by supporting more ADUs and DADUs.

Thank you for considering our comments.

Sincerely,

Rebecca Monteleone

Chair, Sierra Club Seattle Group

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Moriarty, Ryan

Removing the barrier of creating additional parking is essential for growing our density and improving transit ridership. Please ensure this is part of the solution.

» **Thank you for your comment. The comment is noted.**

## Mountjoy-Venning, Cliff

Your report notes that single-family zoning was started as a way to exclude minorities and low-income people from certain areas of the city, and that it continues to serve that function today. So instead of considering how changes might be "incompatible with existing development in Seattle's single-family zones", perhaps we should be looking at how single-family zones are incompatible with creating an equitable city as we continue to grow.

» **Thank you for your comment. The comment is noted.**

Alternative 2 is clearly the superior option in almost every category: it doesn't make sense for there to be owner occupancy requirements - what if the owner needs to move away? They shouldn't be forced to sell or leave the property vacant. There should also be no parking requirements. We already have too much empty parking in the city, and if that ever changes, we should rely on market forces to provide additional parking rather than force every lot to include parking whether it will be used or not. It's also important to exclude any garages from the floor area, since that isn't actually part of the livable structure. The one change I would suggest is to remove the limit on percentage of area roof features can take up. You should be able to design any kind of roof provided it is within the height limit.

» **Thank you for your comment. The comment is noted.**

Allowing more ADUs, and making them easier and cheaper to build is a necessary step towards solving our housing crisis. However, it doesn't go nearly far enough. The best alternative would only add 3,300 units according to your analysis, far below what is needed to keep up with demand for housing. If we really want to solve this crisis, then it's time for Seattle to do away with single-family zoning. SFZ is racist in origin and continues to exclude minorities and low income people, and yet it makes up over half of the residential land in our city. Having broader areas of lowrise and medium rise density has numerous advantages over our current system of largely suburban style lots with pockets of intense density. Medium and lowrise buildings are much more visually appealing than full-block behemoths. People decry much of the development in Ballard because it's ugly, yet the blocks of pre-war three-story buildings in Capitol Hill are celebrated. It also increases the resilience of neighborhoods by allowing smaller changes over time. Those full block behemoths can only be replaced one full block at a time, whereas smaller scale density can change and grow more naturally. Finally, smaller scale density is cheaper to build - both because it's smaller and because you can avoid needed steel and concrete with shorter buildings. This allows a wider swath of the city to potentially own property and build equity, rather than forcing all new development to be made by multi-million dollar companies.

Increasing the supply of ADUs is an overdue step, but really the conversation should be about making LR1 the minimum zoning code in the city.

» **Please see updated information in Section 4.1, Housing and Socioeconomics, on proposed ADU production resulting from the proposed changes. Please note that the proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Rezoning single-family zones to multifamily zones is outside the scope of this EIS.**

Alternative two will add the most housing units and therefore should be selected. We need more housing now!

» **Thank you for your comment. The comment is noted.**

### Mullendore, Zoe

I am supportive of this concept and encourage the city to move forward with allowing ADU's in Seattle.

» **Thank you for your comment. The comment is noted.**

### Murphy, Akira

I strongly support alternative 3 in the hopes that it will reduce rent.

» **Thank you for your comment. The comment is noted.**

I strongly support alternative 3, and 2 to a lesser extent, and wish this process had been quicker and not held up as much.

» **Thank you for your comment. The comment is noted.**

### Myers, Zachary

I agree on certain aspects of both alternatives which will reduce barriers to construction such as removing required parking and the owner-occupancy requirement. The former will help with flexibility on siting and construction of ADUz and the later will help create a more dynamic housing market. However such restrictions as arbitrary unit sizes for these cottages may limit the amount of potential units created in Single Family Home Areas.

» **Thank you for your comment. The comment is noted.**

We are drastically under built in most areas of the city especially in the areas presented in this plan. ADU's will do little to change the aesthetics, I believe it will help create a more robust neighborhood culture to a majority of the city. I think figuring out a way to utilize green space effectively will be important for the city to try to incentivize. We will need to figure out a viable and expedited replacement method if tree canopy or vegetation is reduced to fit a home on a lot.

» **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use, and exceptions added to the Preferred Alternative to preserve trees.**

These units also create more density and options for people who don't want to live in a busy urban district or on a main commercial strip. Relaxing these ADU requirements will also allow local homeowners to utilize their existing parcel and provide extra income to stay in the city. Local landlords are key to a healthy city and rental market, development and housing corps from out of town our market for their bottom-line is worrisome to say the least. With median home prices approaching a million dollars in most single family home neighborhoods in the city and half of the current work force making under 50,000 dollars it is important that we have affordable options for homebuyers and ADU's fit somewhere in the area's housing mix. We should be building neighborhoods that strive to house people from diverse income brackets. Helping prod this equity will create a more stable social fabric in the city.

» **Thank you for your comment. The comment is noted.**

I agree with the governments findings on this, ADU's will allow for a more flexible and more robust land use on existing land within the city of Seattle. It will benefit the city because there will be more people living on one parcel therefore making it more efficient for those parcels to be serviced by the city.

» **Thank you for your comment. The comment is noted.**

Taking the parking requirement out will help better utilize parcel development and also help increase the density of these neighborhoods. A car is a vastly inefficient way to move around the city and the parking space and structures related to it's storage is space ill-allocated. This current pattern of land use in single family homes creates a weak car urbanism that benefits no one. It creates a system where households have too many cars per capita and transit routes go under-utilized by a majority of the neighborhood. Also this would help reduce congestion and help meet our climate goals if these adus were placed in neighborhoods with high transit frequency but low density. Renters and buyers of these units will figure out ways to get to and from work without a personal car.

» **Thank you for your comment. The comment is noted.**

As I mentioned in land use, besides a more complex connection to the main utility lines and infrastructure these dwellings will make more economical sense to hook up and scale up with this development. It is more efficient than traditional development and will take less linear feet of infrastructure for these utilities to connect to these units rather than a suburban style development. As far as schools, these smaller homes might be one of the only affordable units for families in these neighborhoods. This is one reason i'm against the 1,000 sq ft limit, a few extra hundred square feet might allow a family of 4 to live a bit more comfortably and stay in the city. Most good Seattle Public Schools are located in neighborhood's with 1 million + home values. These ADU's will help retain some smaller families and help diversify schools in Seattle by allowing lower income families to attend schools with traditionally high incomes and wealth. Lastly, with the development of more roof runoff it will be important for SPU's Rainwise Program to expand and allow for cistern or rain garden installations at the ADU's especially if the existing house on the parcel is eligible. Adding a Adu might double the potential captured area of rain on one parcel. It will be crucial to figure out a way to reduce CSO's in basins that are single family and benefit from this development. Also from a design perspective it may be more practical to combine cisterns and rain gardens installations on one parcel.

» **Thank you for your comment. The comment is noted.**

## Naess, Ralph

I think including parking in the footprint of the ADU's is reasonable as outlined in alternative 3.

» **Thank you for your comment. The comment is noted.**

I am doubtful that this will have a meaningful impact on affordability, but its worth a try. Alternative 3 is preferred in that it will require property owners to live on the property. This will help to maintain neighborhood integrity and reduce the opportunity for landlords to create "boarding houses" out of ADU's and DADU's.

» **Thank you for your comment. The comment is noted.**

Gradual, smaller scale is the way to start. The law of unanticipated consequences means we cannot accurately project how this will impact communities, until it is implemented. Start slow. You can always ease regulations later.

» **Thank you for your comment. The comment is noted.**

Alternative 3 is a good compromise between aesthetics and improving housing access.

» **Thank you for your comment. The comment is noted.**

I support Alternative 3, because it will help maintain neighborhood integrity.

» **Thank you for your comment. The comment is noted.**

I support Alternative 3. Best compromise between increasing housing and maintaining neighborhoods.

» **Thank you for your comment. The comment is noted.**

## Namkung, Ju

I live in Wallingford, in District 4 and am very concerned about the lack of affordable housing in Seattle. I myself am fortunate to be a homeowner but there are thousands who are no longer able to afford to buy homes in Seattle. We should allow for more rentable housing to help more people all along the income spectrum to be a part of our vibrant community. I favor Alternative 2 because it removes the owner-occupancy requirement and the parking requirement and reduces the barriers for owners to add ADUs to their properties.

» **Thank you for your comment. The comment is noted.**

## Nan Todd -Smethurst

If your area is red lined to become multi- family what are your options

» **Thank you for your comment. The comment is noted.**

I am surprised that there are no allowances in the new code proposals for "true tiny houses " that are built to a standard building code of the City or A RIVA Code. In addition there is no indication of a staged conversion submittal .

There appears to be no increased pricing diversity if the new code changes are implemented .

In a City where lower cost options are necessary to provide for extended family living accommodations which will be rapidly increasing with the onslaught of an aging population , and disabled adults and children with special needs-- there are no provisions in this code.

» **The proposal evaluated in this EIS focuses on proposed changes to the Land Use Code for the construction of ADUs. Modifying what constitutes a single-family dwelling by removing the requirement that the structure has a permanent foundation is outside the scope of this EIS.**

## Neiman, David

I support Option 2, as it provides the most opportunity for homeowners to build ADU's and DADU's with the fewest restrictions. I support incorporation of one idea from alternative 3 which would allow (2) ADU's in any form (either attached or detached. I would also recommend loosening of restrictions that govern where DADU's can be placed, and removal of all restrictions for where unit entries can be located.

» **Thank you for your comment. The comment is noted.**

## Nest Architecture & Design,

Thank you for all your work! I support comments by Dan Bertolet of Sightline dated June 8, 2018. Mine is an abridged version of MOAR Backyard Cottages' comments by co-organizers Matt H & Laura L with added comments based on my experience designing 10 DADUs. I support:

- \* Eliminate parking requirement. All of the DADUs ive designed had ample street parking. Owners still park on the street and have planted gardens and chicken coops in the driveways.
- \* Reduce minimum lot size for ADUs. Anyone regardless of lot size they own should be able to add an ADU.
- \* Portland and Vancouver dont have owner occupancy requirements and they are ahead of Seattle in production. Single Family rental houses dont have owner occupancy requirements.
- \* Freedom to choose best fit and type when creating accessory dwelling units. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures. In addition, allow Jr Adus with minimal permitting, to create more affordable, legal units (until they turn 21).
- \* Increase height allowances for green roofs. Add height allowances and flexibility of material and methods to shield from view/privacy between poorly scaled transition from SF zones to NC zones (if those SF zones have no chance of being rezoned to a MF, to buffer between SF & NC).
- \* Increase rear yard coverage for additional flexibility/buffering neighbors privacy, better chance of preserving trees.
- \* Reduce pre-development & permit costs by dedicating specialized reviewers to ADU/ DADU projects. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.
- \* No MHA. Even without this fee, 3 potential homeowner clients have backed away. It is important to have owner/builders who have equity in home, as part of the affordable housing on solution.
  - » **Please see the response to the form letter included in Section 5.5.**

## Newbold, Sheri

Thank you for the opportunity to comment on the Draft EIS, and for providing this thorough Draft EIS document.

I support providing the most flexibility for creating ADUs and DADUs. The more flexibility the code provides, the more units that will be created since the code will have more potential to meet the individual personal and property circumstances.

Alternative 2 of the three alternatives studied provides the most flexibility, and so I support all of the changes in Alternative 2.

Items where I suggest further study:

Alternative 2 #6: The height limit ought not be determined by lot width because regardless of lot width, there are building code requirements for minimum interior height as well as cultural preferences about interior height. Please study increasing the height limit for all DADUs regardless of lot width.

Alternative 2 # 13: Construction costs in Seattle are expensive. Construction cost (hard cost) is the main cost of creating DADUs and ADUs and is also one of the main impediments to their creation. To be clear, soft costs (pre-development and design) are a small portion of the total cost of building an ADU or DADU. There are multiple current ideas on how to reduce soft costs for ADU and DADU creation. These need to be studied more extensively.

One idea that has been discussed is to immediately remove the sewer capacity charge from the addition of a new DADU.

Another is to dedicate staff to review DADUs and ADUs. They also would review other projects; however, this trained, dedicated staff would consistently review all submitted ADU and DADU projects which will reduce the amount of calendar and design time needed to permit these structures. Beyond this, developing a protocol for ADUs and DADUs to be permitted under the Subject to Field Inspection (STFI) process would further reduce the calendar time and therefore cost required to permit these structures.

The idea of pre-approved plans has been discussed by various parties to save on soft costs. There are many constraints on Seattle sites: Existing topography, existing trees, total lot coverage already used by other existing to remain structures, access to the property, plus desired site design, etc. In order for a pre-approved plan to actually be functional and work without alteration, the city will need to allow departures from other rules, such as allowing additional total lot coverage when using a pre-approved plan, or allowing a departure from the height limit. Without this built-in flexibility, pre-approved plans will need to be altered significantly, which will negate their intended purpose.

Getting back to construction cost, which is one of the main impediments to building ADUs and DADUs, there needs to be more information studied and put in place:

A) Education: Workshops and seminars on why and process and costs to create an ADU and DADU.

B) Some property owners have cash or equity (HELOC) that they can use to pay for a DADU/ADU. If one does not, there needs to be a clear path for a construction loan to build an additional unit. To my knowledge, construction loans underwritten by FNMA/ FMAC are not approved for second units, so only banks that do portfolio lending programs (not underwritten by FNMA/FMAC) can do construction loans for ADUs/DADUs. Research and publication of streamlined construction loan programs for building DADUs and ADUs from local lenders would go a long way to help owners finance the process. Beyond this, allowing the potential rental income to be used for qualification would help more people be approved.

C) Those owners who would not qualify for a bank construction loan could use alternate financing programs that may be created for this purpose.

D) Incentives: All of the items in Alternative 2 create more flexibility which in itself is a passive incentive. Beyond this ADUs and DADUs need to be incentivized proactively. Please study what would actually promote their creation, such as programs for low-cost construction loans in exchange for leasing the dwelling unit for a to be determined period of time at a lower rent; or allowing greater total lot coverage than 35% if creating both a DADU and ADU; or extra height for using a sustainable building method and creating both a DADU and ADU, etc. Please do not disincentivize them by adding MHA fees to the cost of creating a DADU or ADU.

Thank you.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Nguyen, Denis

I refer to Section 1.7 which states that Alternative 2 would produce an extra 1440 ADUs over a 10-year period. I find it absurd that the city is spending an inordinate amount of money on this study when the number of new units we're discussing amounts to 4 apartment towers OVER TEN YEARS.

Seattle is in a housing \*emergency\*. While we waste time with these EIS meetings, 1500 people settle in the Greater Seattle Area every week. Why are we giving existing property owners the opportunity to hold up rezoning while they sit on their laurels and capture appreciating land values because they are actively withholding supply in the market.

The problem is simple: Seattle has a housing supply problem. Let's put a stop to the unfounded transfer of wealth to property owners by approving these types of rezones rapidly.

» **Please see the frequent comment response concerning ADU production estimates.**

## NK Architects,

My comments address the Draft EIS as numbered by the Draft document;

1. Number of ADU's allowed: Either Alt 2 or Alt 3 is a win for the city's desire to make affordable housing take place in a simple and cost effective manner. I support both Alts but feel that Alt 2 is more readily acceptable than Alt 3.

2. Off-street Parking: I strongly encourage the City to require NO off-street parking. Parking of personal vehicles on city streets is a benefit offered by the citizens of this community and should be available to all, especially those living in smaller units that are allowed as AADU's and DADU's. The community owns the streets. All members of the community should share access. As our neighborhoods are today, most of the existing single family homes have cars that are parked on this public property. Therefore extending this opportunity to newer members of the community who may occupy accessory dwellings seems to be the right thing to do. Reduce the cost of such housing by any and all means necessary.

3. Occupancy Requirements: I strongly support Alt 2 in which owners occupancy is NOT required as this will lead to more affordable units being available in creating the diverse neighborhoods that are healthy and efficient.

4. Minimum Lot Size: I support the reduced minimum lot size of 3200 sq. ft.

5. Maximum gross floor area: I support Alt 2 with 1,000 sq. ft. EXCLUDING the garage and storage areas. Instead the lot coverage of both AADU's and DADU's should govern as suggested in item #7.

6. Maximum height: It is critical that the height be increased to allow for the real needs of 2-story DADU's versus a severely constrained and tortured design. In addition, special allowance needs to be allowed for renewable energy features such as PhotoVoltaic panels and Solar Thermal collection arrays. Our impending climate disruption requires that we maximize the available roof area for renewable energy generation wherever and whenever possible.

7. Lot Coverage: I support the NO Change proposed.

8. Rear Yard coverage: I support the proposed change as noted.

9. Roof Features: Please, very important, we must allow PV and Solar Thermal features exceed otherwise required height limits. Very critical to our community response to Climate Change which is a stated City goal.

10. Location of DADU entry: My strong preference is to allow for entries on a case by case basis rather than a simple rule that will not fit many conditions. Let's not create obstacles to creative design. Instead the city can recommend mitigating impacts that may affect neighboring properties and have this evaluated on a case by case basis.

11. Maximum household size: Yes, please change to 12 to allow for reasonable occupancy of the proposed two accessory units.

12. MHA requirements: no need to burden what is already a more affordable alternative with such constraints as MHA requirements.

13. Predevelopment costs: Alt 2 - very important. Please make any and all accommodations to reduce the costs of developing AADU's and DADU's including Sewer Capacity Charges (impacts are diminishing with low flow fixtures) and permitting costs and time frames.

14. Maximum floor area ration FAR: Bad ideas in Alt 3 to propose new FAR limits on single family lots. Stick with lot coverage and height limits. Thank you.

» **Please also see the response to the form letter included in Section 5.5.**

Parking: The Congress for New Urbanism has promoted street parking of cars as an improvement to the pedestrian quality of service on our streets. I am in agreement that street parking should allowed and encouraged. If parking becomes a challenge we are therefore encouraging other forms of transportation that are generally available such as: car sharing services, bike sharing, public transportation, walking etc.

» **Thank you for your comment. The comment is noted.**

Thank you for the City of Seattle taking a leading role in improving the livability and affordability of our neighborhoods by proposing the changes herein addressed. Please proceed to approve such legislation as soon as reasonably possible.

» **Thank you for your comment. The comment is noted.**

Aesthetics: I support the idea that allowing for more smaller units will result in fewer tear downs of our existing housing and therefore serve to preserve the existing look and feel our neighborhoods.

» **Thank you for your comment. The comment is noted.**

As a single family home owner in a popular and desirable in-city neighborhood, I fully support the changes being proposed in that they would improve our communities with diverse living accommodations, more choice in living arrangements for existing home owners and make better use of the existing city infrastructure of streets and utilities. Our communities will be improved.

» **Thank you for your comment. The comment is noted.**

I agree with the conclusion of the DRAFT EIS:

"No significant adverse impacts are anticipated to public services and utilities; therefore, no mitigation measures are proposed."

» **Thank you for your comment. The comment is noted.**

I strongly support the analysis put forth in the EIS related to affordability and displacement. Since LAND is the current key cost factor that remains very difficult to mitigate, allowing small accessory dwelling units allow for long term affordability of such smaller units within the land use pattern that we already

hve in place. I expect that fewer tear downs of exiting small homes will occur with the proposed relaxing of restrictions on accessory dwellings.

- » **Thank you for your comment. The comment is noted.**

## No Phree Rent,

I prefer Alternate #2

- » **Thank you for your comment. The comment is noted.**

## Nordby, Evan

I support Alternative 2. In particular, I support increasing the size of DADU's allowed, and removing the owner occupancy and parking requirements, in order to allow a broader range of ADU building under a broader range of circumstances, to encourage more affordable housing for families.

- » **Thank you for your comment. The comment is noted.**

## Novak, Vaclav

I'm missing some positive impacts discussed: Reduced (not only CO<sub>2</sub>) emissions from shorter commutes; increased safety coming with increased usage of bicycle infrastructure; decrease in car traffic associated with increased transit and bicycle ridership; increased walkability of the neighborhoods.

- » **Please see response to the frequent comments regarding positive impacts of the proposal.**

## Nunes-Ueno, Elsa

The owner occupant requirement is a hindrance to people taking the plunge to build a backyard cottage or ADU if when they sell they either have to dismantle it or reduce the pool of buyers and eliminate investors. I feel there should be no owner occupancy requirement or a one-three year requirement that sunsets as the additional unit becomes grandfathered into the neighborhood.

- » **Thank you for your comment. The comment is noted.**

No parking requirement, please. We cannot become a denser place and reserve space for cars.

- » **Thank you for your comment. The comment is noted.**

We should free up homeowners to become part of the solution here and we do not need as much parking as people think we do.

- » **Thank you for your comment. The comment is noted.**

We need more density in single family zones

- » **Thank you for your comment. The comment is noted.**

Incentivize homeowners to build affordable housing too, not just developers! Many people want to do their part to help the housing crisis.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion**

**of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

### Omana, Juan C.

Single family zoned areas are already vastly underserved by public transportation. Encouraging density in these areas (even if low-rise and low-impact like ADUs and DADUs) will only make congestion worse as these tenants will bring their single-occupancy vehicles to clog up neighborhood streets. As ideal as it would be to have excellent transit service and reduce car use, many Seattleites still drive cars, and that will not change in the near-term.

» **Thank you for your comment. The comment is noted.**

Rather than trying this half-hearted compromise, the city should be looking to encourage the development of condominiums and townhouses in select neighborhoods to allow for more ownership, as opposed to rentals. Likewise, the city should aim to preserve specific neighborhoods with exemplary character that give Seattle a sense of place. This can be achieved by allowing selective development to take hold in specific neighborhoods to increase property ownership but also maintain character (ADUs and DADUs will only create an underclass of tenants). The city should then seek to change the zoning in areas that are vastly under-utilized, such as along major arterials (Delridge Way SW; Aurora Ave N), to encourage more mixed-use development. This is where rental properties should be congregated, so that businesses and services can compete to meet the needs of tenants in the buildings above, while allowing many single family neighborhoods to maintain the charm that gives Seattle its identity. Finally, the city should do more to keep existing affordable housing from disappearing by offering incentives and assistance to landlords so that needed improvements can be made without raising rents significantly.

» **The proposal evaluated in the EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

I encourage the City of Seattle to make NO CHANGES to the current Land Use Code related to ADUs (pursuing the No Action Alternative).

» **Thank you for your comment. The comment is noted.**

I ask that the city council stop proposing stupid band-aid fixes to the housing crisis, and start getting serious about urban development and planning. Zoning changes and upzoning are going to be needed in some areas to meet housing demands, but you also have to realize that good times don't last forever. The headwinds are telling us that the current boom is reaching past its climax, and Seattleites don't want to be stuck with badly implemented policies during bust times. DADUs and ADUs are terrible way to close the housing gap.

» **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Please see Chapter 2, Alternatives, for a description of the objectives of the EIS; changes that go beyond ADUs are outside the scope of this EIS.**

The ratio of renters to property owners in Seattle is high. Encouraging more renters to live in single family zones will have broader negative economic impacts on the electorate which would favor less action on improving livability and more city resources spent addressing the needs of residents who are not rooted in the community. This will fundamentally change the character not just of single-family neighborhoods, but of the city as a whole. The property tax contributions of renters and property owners are not 1 to 1. The free market will only support so many rent increases to cover the costs of rising property taxes, and so those costs cannot necessarily be passed on to tenants. Encouraging more

tenants also reduces the tax base, which will make it more difficult for the city to fund various social program, much less meet the needs of the citizenry by maintaining infrastructure and providing services.

- » **The proposed Land Use Code changes would increase the number of renters; however, the owner of the rental units would still be required to pay property taxes.**

Seattle's public utilities are aging, and it is unfortunate that the impetus to replace sewer lines that are nearing their 8th decade of usage is on homeowners instead of the city. Allowing more density in single family neighborhoods through DADUs will put pressure on the existing utilities that could have disastrous consequences. It is unrealistic to expect that there will be sufficient new development to spur wholesale replacement of aging utility infrastructure. Further, more density requires greater services in terms of public safety. As stated above, tenants cannot be expected to absorb or contribute 1:1 on property taxes. Increasing the ratio of tenants to property owners in the city will de facto lower the tax base, so there will be less money to cover necessary services like police and fire departments. These deficiencies cannot be closed by asking for more money from property owners. At some point, they will leave if the tax burden is too troublesome.

- » **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

## O'Meara, Erin

I support EIS Alternative 2, because it includes all the most needed changes:

allowance for 2 ADUs

removal of owner occupancy requirement

removal of parking requirements

reduction of minimum lot size

relaxation of DADU size limits

- » **Thank you for your comment. The comment is noted.**

Please continue to think about how we can create more housing for residents, and how these rules can support that effort.

- » **Thank you for your comment. The comment is noted.**

## Owens, Eva

I dont think parking should be a requirement for building ADU and DADUS

- » **Thank you for your comment. The comment is noted.**

I am a home owner and tech worker based in Ballard. I believe that we should increase density and increase access to housing including allowing DADU and ADUs in single family home zones (like mine).

- » **Thank you for your comment. The comment is noted.**

## Padelford, Gordon

reduce car parking requirements

- » **Thank you for your comment. The comment is noted.**

Please act to give people more housing options!

- » **Thank you for your comment. The comment is noted.**

I hope Seattle moves to adopt pre-approved designs that reflect our region's character like using natural materials (wood and stone).

- » **Thank you for your comment. The comment is noted.**

## Parker, Grace

I strongly oppose this proposal. Single family neighborhoods become essentially upzoned without required infrastructure. There are also no safe-guards to turn quiet residential areas into transient rental properties. People who come and go as renters don't have the same level of concern as home owners. This is a direct blow to the concept of neighborhood in Seattle.

- » **Thank you for your comment. The comment is noted.**

## Parker, Jeff

This one-size-fits-all effort to rezone sounds good because it simple, but long-term urban planning is hard and demands time and deep thought by trained experts. Let's not fool ourselves into thinking we can take shortcuts.

- » **Please see the frequent comment response regarding individual neighborhood review.**

Proposal to radically changed settled zoning laws may be driven by good intentions, but seemed to be uninformed at best and deliberately negligent at worst. The promised benefits of the proposed rezone are not supported by facts or best urban planning/development practices. The unintended consequences of such ideologically-driven programs are almost always negative and sometimes catastrophic.

- » **Thank you for your comment. The comment is noted.**

Single biggest beneficiary of zoning change will be developers, who will pack lots with grim and poorly constructed town homes they can sell for \$2 million each.

- » **Thank you for your comment. The comment is noted.**

Economics of rezone will be to drive cost of land up and by extension, the cost housing. It just transforms livable neighborhoods of un-affordable single family homes into unlivable neighborhoods of un-affordable townhomes.

- » **Please refer to Section 4.1, Housing and Socioeconomics, and Appendix A for a discussion of potential effects on the price of housing.**

Best example of aesthetic impact of proposed rezoning is Ballard. This once healthy community of families is now a blight -- so much so that urban planners around the world have added the pejorative

term "Ballardization" to their professional lexicon (to destroy the social fabric and aesthetic charm of a neighborhood).

» **Thank you for your comment. The comment is noted.**

Virtually no parking requirements for new town homes? Really?

» **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs in single-family zones. Parking requirements for townhomes are not considered and are outside the scope of the EIS.**

## Pary, Miller

Hi! We need more housing in this city! Please help people build ADUs and backyard cottages.

» **Thank you for your comment. The comment is noted.**

## Pederson, Art

ADUs/DADUs are an important means for increasing small scale affordable housing options in large sections of the city, otherwise limited by the underlying zoned housing density, such as in single-family zones. We need to do more than maintain the current system that the "no change" alternative would maintain.

Alternatives 2 and 3 share many good elements. I won't comment on those but instead focus on the removal of the owner occupancy requirement and the impact it will have on the ability of individuals/families to own an affordable stand-alone house in Seattle.

The proposal to remove the current owner occupancy requirement will open up all affected single-family zones to immense pressure from absentee investors who rightly see an opportunity to have 2 or more rental units on a lot without the burden of occupancy of at least one of those units. This business based decision (speculative exchange value) is at odds with the primarily non-business based interest (use value) of owner occupancy.

The Draft EIS does not consider this issue in any depth. The effects of dislocation and building tear-downs, which are important issues, are analyzed. But no analysis is presented of the price pressure this new and greatly expanded investment opportunity will create on the ability of a non-investor to simply own a stand-alone dwelling unit, whether on a small Fremont lot or large Broadview lot.

Currently, or as proposed in Alternative 3, which maintains the owner occupancy requirement, there are several reasons why a person would add an ADU: it could be simply to house a relative (a true "mother in law" unit) in a fully separate dwelling unit. Or it could be to have a dwelling unit to bring in extra income from an otherwise unused yard or interior area. Or it would be for the altruistic goal of increasing the pool of housing, maybe even in combination with the first two reasons. But that occurs now and would continue to occur within the context of an owner occupant making that choice.

Removal of the owner occupancy requirement will remove the natural break on escalating housing costs and thus the ability of the non-investor/not investor backed individual or family to afford ownership of a stand alone structure.

A second issue related to removing the owner occupancy requirement not addressed in the Draft EIS is the aesthetic impact of absentee ownership. One of the wonderful effects of owner occupancy on Seattle's visual quality are wonderfully landscaped yards, planting strips and other improvements. These are created through the immense amount of free labor/sweat equity that owner occupants invest into

their properties. These aren't done as economic decisions, like any improvement on an investment is done. While these sweat equity improvements likely add to the property's value at the time of eventual sale, they don't add any day to day marketability or income benefits to the property. That is not their purpose. Because the true cost of these improvements is mitigated/lessened by the owner's non-economic goal of the joy of gardening or landscaping and not paid out of pocket to a landscape designer or maintenance company, it is affordable.

However, an investor looks at the cost of everything relative to the return it brings, there is no "sweat equity" investment (there may be with the very small one property investor, but it diminishes to nothing with the larger investors). Improvements have costs for installation and maintenance; a lawn or standard "shrubbed-up" landscape tended by landscape management company is a much lower cost for installation and maintenance than a complex garden with a variety of plants that require constant tending and attention. Unless the rents are so high that they cover extra and extensive extraneous costs, any aesthetic investment will not be made.

I am a single family home owner as well as an owner of a multi-family building. I take great pride in my care of both. As a "landlord" I am proud that I provide a safe and attractive property to my tenants. But I do not put the same sweat equity into my rental property as into my house for the above reasons. I know that to add a couple of thousand dollars a year to an enhanced landscape plan (maintenance company, watering, plants and hardscape) means adding that directly to each tenant's monthly rent.

Some assert that the owner occupancy requirement suppresses the development of ADU's by somehow restricting owner flexibility for long term travel or living elsewhere. This is not true, as the current rules only require occupancy 6 months of the year with the ability to waive this for a longer absence time provided a statement of intent to return is made. While this may seem burdensome or inflexible to a few, it is far better to avoid the inevitable upward price pressure that will occur in single-family zones due to the economic logic of multi-family investment calculation. Or that if a single-family homeowner moves to another location and rents their former home they will now be prevented from adding an ADU. But this is a choice by the homeowner to become an investor. It should not be the goal of the revised ADU regulations to encourage or support non-owner occupant investment. The goal is to add affordable housing while preserving the character and affordability of single-family areas.

I strongly encourage the City to move ahead with adding flexibility to the current ADU/DADU regulations to increase the availability of smaller and affordable housing options throughout the City. Please do not do this at the expense of the affordability of ownership. The availability of affordable rental housing will increase under all three alternatives. Unless the intention of the City is to increase the ratio of renters to owners, only by retaining the owner occupancy requirement will the dual and worthy promises of affordable ownership and affordable rents have a chance of being maintained.

Thank you

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative and the owner-occupancy requirement and Section 4.1, Housing and Socioeconomics, for analysis removal of the owner-occupancy requirement.**

## **Pfister, Matt**

Support Alternative 2

- » **Thank you for your comment. The comment is noted.**

## Pickard, William

1. Off-street parking is a material issue. Insufficient parking is already a significant problem in single family zones. If someone who is adding an ADU does provide off street parking, they should receive a bonus of 300 sqft and 3 feet of additional height in return for each parking space added. Phrased differently, the City should provide an incentive for homeowners to provide off-street parking.

2. ALL utilities, including power and telephone lines, should be buried.

» **Thank you for your comment. The comment is noted.**

## Piering, Pam

I am in favor of Alternate #3 in the following areas:

1. I oppose the idea of no off-street parking required, and support the requirement for off street parking when there is more than one additional unit on the lot.

2. I strongly oppose the idea that the home/ADU does not need to be owner-occupied, and I support the requirement that the home (or ADU) be owner occupied. This the most critical issue, in my opinion.

» **Thank you for your comment. The comment is noted.**

## Pin, Yih

I fully support Alternative 2.

» **Thank you for your comment. The comment is noted.**

I do not care about visual character of SFH zones.

» **Thank you for your comment. The comment is noted.**

I fully support any change that allows more housing to be built.

» **Thank you for your comment. The comment is noted.**

I don't think compatibility with existing development is a valid concern.

» **Thank you for your comment. The comment is noted.**

I think we should make all offstreet parking metered.

» **Thank you for your comment. The comment is noted.**

I fully believe the city can scale to a larger population.

» **Thank you for your comment. The comment is noted.**

## Pinsker, Danny

I support alternative 2, and generally any efforts that permit infill development to support multifamily housing without owner occupancy and parking requirements.

» **Thank you for your comment. The comment is noted.**

I support EIS Alternative 2 and the original HALA proposal.

» **Thank you for your comment. The comment is noted.**

Vienna (11,799/sq mi) : Seattle (4,271/sq mi) - we can do it.

» **Thank you for your comment. The comment is noted.**

More and better housing and transit options can only improve affordability and livability for all income types.

» **Thank you for your comment. The comment is noted.**

Multifamily development is prohibited by zoning in 90% of Seattle. This is very poor land use and encourages sprawl throughout the region. Increase density, improve infrastructure with the improved tax base.

» **Thank you for your comment. The comment is noted.**

We need grade separated transit everywhere. Bikes and buses should both have restricted access routes throughout the city, please. Also more light rail.

» **Thank you for your comment. The comment is noted.**

This city should be promoting efficiency, ruggedization and availability improvements for all consumers and producers. More encouragement of roof top solar, grid tied storage, municipal broadband and finally consumer grade rainwater/stormwater management.

» **Thank you for your comment. The comment is noted.**

## Placido, Allison

I suspect upgrades should be made throughout the city (SPECIFICALLY sewers in north Seattle/Broadview).

» **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

I like Alt 2, which seems to remove the most barriers

» **Thank you for your comment. The comment is noted.**

We MUST do better to make Seattle affordable for people of all income levels.

» **Thank you for your comment. The comment is noted.**

AUDs are common in my neighborhood (Broadview). I have 2. Honestly, you really don't even notice them when thoughtful landscaping/tree canopy care is taken.

» **Thank you for your comment. The comment is noted.**

Just do whatever needs to be done to remove barriers to AUDs and get this crackin'.

» **Thank you for your comment. The comment is noted.**

This is an extensive study. No comment here

» **Thank you for your comment. The comment is noted.**

Sidewalks should be readily available everywhere first. It increases use of public transportation and gets kids to school safely. I see that is addressed here, but it should be prioritized. In Broadview, it's terrible (elementary aged kids walking on muddy, sloped grass or gravel on roadsides to keep out of the way of vehicles) because there are no sidewalks for them to use to get to school.

» **Thank you for your comment. The comment is noted.**

## Pryor, Inness

Yes please!

» **Thank you for your comment. The comment is noted.**

## Pugh, Kathleen

I encourage a full environmental impact analysis especially concerning loss of grass, trees and bushes where the accessory dwelling units are built and the effect of encouraging even more cars by not limiting them in neighborhoods.

» **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

## Pullman, Aubrey

Don't require parking!

» **Thank you for your comment. The comment is noted.**

Make them easier to build!

» **Thank you for your comment. The comment is noted.**

Mixed income neighborhoods are important for the social well-being of the city.

» **Thank you for your comment. The comment is noted.**

Single family zoning is incompatible with an inclusive, affordable city.

» **Thank you for your comment. The comment is noted.**

## Rabatin, George

All recent changes have made things worse. Seriously consider option 1 and stop the mess you've already created with allowing all this additional density.

» **Thank you for your comment. The comment is noted.**

Alternative 1

» **Thank you for your comment. The comment is noted.**

Alternative 3

» **Thank you for your comment. The comment is noted.**

Alternative 3. A large portion of the big increases have been caused by levy

- » **Thank you for your comment. The comment is noted.**

### Randall, Chris

Alternative 2 seems like the most effective plan. I would like to see this put into action to maximize the housing availability in Seattle.

- » **Thank you for your comment. The comment is noted.**

### Ranieri, Katherine

Number of ADUs: prefer alternate 3, Parking: prefer no parking required, Max SF: pref alt 3, Max Height: prefer alt 3, lot coverage: prefer alt 2/3, roof features: prefer allowed, dadu entrances: pref alt 2/3, max household: prefer alt 2, MHA: prefer alt 2, predevelopment: prefer alt 2, FAR: alt 2,

- » **Thank you for your comment. The comment is noted.**

looks great

- » **Thank you for your comment. The comment is noted.**

### Ray-Keil, John

I'm in favor of Alternative 2, but would like to see financial support new plumbing lines required for dadu.

- » **Capacity charges are levied by King County; the City does not have authority to waive those fees. King County has two studies underway that may lead to changes to the capacity charge, including charges for a new ADU. See [kingcounty.gov/services/environment/wastewater/capacity-charge/review-studies.aspx](http://kingcounty.gov/services/environment/wastewater/capacity-charge/review-studies.aspx) for more information. Please also see the frequent comment response regarding King County Sewage Treatment Capacity Charges.**

Alternative 2 is much better than current. I'd like to see backyard coverage ratio changed to 60% regardless of height of dadu.

- » **Thank you for your comment. The comment is noted.**

I'm in favor of Alternative 2, but would like to see existing duplexes keep both units, as well as add both an adu and dadu for a total of 4 living spaces.

- » **The study area for the EIS includes land zoned single-family outside existing urban villages and urban village expansion areas studied in the Mandatory Housing Affordability EIS. Please see Exhibit 2-1 in Chapter 2, Alternatives, for a map of the study area. A duplex is not a permitted use in single-family zones. An existing duplex would be considered a nonconforming use. Adding an ADU to a nonconforming use might be possible but would require review by the Seattle Department of Construction and Inspections to determine that the existing duplex is legally nonconforming.**

### Rearick, Whitney

Do not apply a Mandatory Housing Affordability contribution to ADU and DADU construction. Many existing ADUs are rented well below market. Permitting and construction costs are already high

enough. Adding more costs would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

Streamline permitting by dedicating reviewers to ADU/ DADU projects. With dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months.

Allow the most flexibility possible when creating accessory dwelling units. Consider allowing owners to make a mix of attached and detached ADUs or DADUs.

Eliminate the owner occupancy requirement. We don't require owners to live on site of other rentals, why require it of ADUs?

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative does not include an affordable housing incentive or requirement. Please also see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

Increase the allowed gross floor area for detached accessory dwelling units to 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to the inclusion of more much-needed two-bedroom (or larger) dwellings for larger Seattle households.

Raise the maximum number of residents on a single lot to 12 - we could easily support a cooperative of 3-four-person households on a typical 5000 sf lot.

- » **Thank you for your comment. The comment is noted.**

Eliminate minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allowed within the zone.

- » **Currently, there is no minimum lot size for an AADU. The Preferred Alternative includes reducing the minimum size required for a lot with a DADU from 4,000 square feet to 3,200 square feet.**

I support of the ADU/DADU options outlined in the draft Environmental Impact Statement that enable the most housing to be built for the lowest cost. Any policies that increase housing density and diversity within Seattle city limits will reduce the pressure on our transportation systems and on the environment. In the fact of climate change, reducing our impact as much as we can, and quickly, is especially important.

- » **Thank you for your comment. The comment is noted.**

Eliminate the parking requirement for ADUs. More and more people are successfully car-free in Seattle, and this trend will continue. Already many homes "" both old and new construction - in Seattle have no on-site parking. It's working. The neighborhoods where on-street parking is the norm are still just as in demand as areas where there's plenty of off-street parking.

- » **Thank you for your comment. The comment is noted.**

Keep costs low so that more people can afford to build more units.

- » **Thank you for your comment. The comment is noted.**

## Reiner, Cathy

Allowing ADUs and MIL is the best way to add housing AND to make it more affordable for people to afford to buy houses.

- » **Thank you for your comment. The comment is noted.**

Many of our neighborhoods have big lots and plenty of room for ADUs

» **Thank you for your comment. The comment is noted.**

So many houses have more space than needed, and could affordably and relatively easily be turned into a duplex, so many big seattle yards have room for backyard cottages -- allow tiny houses in backyards!!

» **Thank you for your comment. The comment is noted.**

## Rempfer, Jean

Keep the eight person limit, neighborhoods stay basically the same

» **Thank you for your comment. The comment is noted.**

I vote for alternative 2 no owner occupancy needed, alternative 3, allow 2 AADU's

» **Thank you for your comment. The comment is noted.**

Please allow 2 AADU's per dwelling and allow the owner to live elsewhere

» **Thank you for your comment. The comment is noted.**

No change, do 2 AADUS, no owner occupancy, building looks exactly the same

» **Thank you for your comment. The comment is noted.**

Enough space where we are (adjacent to Salmon Bay Park) that strangers park here all the time, there's a guy out there right now living in his long trailer attached to his huge truck right outside. Allow 2 AADU'S, no owner occupancy and I can get him in here! We are elderly, we keep rent down, have low income person in our existing AADU right now, sad to see someone on the street, even if he does have a trailer. We were homeless once, by the grace of God got this place. Please allow us to share with as many as we can. Usually, a single man on s fixed income, usually 1 senior citizen. Also, please hurry with your decision. People are suffering, p.s. Our tenants are good, quiet people who are definite asset to our neighborhood, but if someone else got noisy tenants there are already safeguards against nuisance.

» **Thank you for your comment. The comment is noted.**

I just pay all utilities for all, although the AADU has separate meter, this way tenant has to write only one check and no worries, tenant says he feels lucky he found this place. We are trying hard for him, I think homeowners are more human and compassionate with their tenants, better place to live than disinterested owners of multiple apt units or condos. We care. We even love his cats, they have own yard (we partitioned off yard) natural setting by the park. We would similarly partition off our south side for extra AADU, charge low rent, help someone. If we could move out, a third person or family could have the middle. All would have separate entries, yards, and a home feeling, not some condo with only a deck to experience the weather on, with a non-caring owner. If our tenants need something we get it NOW, we just want to give people a chance at house-like structure with yard where they can grow garden and have their pets and also their privacy, with private entries and yards, you know like a real house.

» **Thank you for your comment. The comment is noted.**

This would make a lot if cheaper housing in residential areas with no changes to building or appearance of surrounding lawns, yards, keeping the "homestead" style, no condos.

» **Thank you for your comment. The comment is noted.**

## Resident-West-Seattle-Sunrise-heights,

While public transportation is available, it is less widely used and most residents do own vehicles. Parking is already difficult in most neighborhoods without off street parking. Not requiring off street parking for ADU's would add exponentially to the street parking density would be disastrous.

» **Thank you for your comment. The comment is noted.**

Alternative 1 is preferred by most home-owners. Alternative 2 would ONLY be preferred by developers who don't have to actually live in the neighborhoods they destroy.

» **Thank you for your comment. The comment is noted.**

The most important aspect of these 3 alternatives is the requirement that the owner must live on the property- This is critical to keep speculative developers from buying properties and developing them in the cheapest means possible without regards to aesthetics or quality of life issues for the neighborhood, which would greatly erode the quality of life for the actual homeowners who live there, as well as the renters. It would discourage neighborhood involvement by residents as they would be primarily transient and not vested in the neighborhood.

The second most important component is that on site parking be provided. While public transportation is available, it is less widely used and most residents do own vehicles. Parking is already difficult in most neighborhoods without off street parking. Not requiring off street parking for ADU's would add exponentially to the street parking density would be disastrous.

Alternative 1 is obviously preferred by the vast majority of SF home owners. If the City is not going to honor their wish to go with Alternative 1, please adopt option 3 because: 1) it requires homeowners to live on the property and 2) it requires off street parking.

A hidden negative aspect of Alternative 2, is that it would result in speculative development, so the neighborhoods most affected would be the cheapest neighborhoods, thereby having the greatest negative affect on the poorest segment of homeowners. Developers won't be targeting Queen Anne, they will be targeting Delridge and MLK, which would by default make it a racially biased system.

» **Please refer to Section 4.1, Housing and Socioeconomics, and Appendix A for a discussion of the potential effects on housing economics.**

The most important aspect of these 3 alternatives is the requirement that the owner must live on the property- This is critical to keep speculative developers from buying properties and developing them in the cheapest means possible without regards to aesthetics or quality of life issues for the neighborhood, which would greatly erode the quality of life for the actual homeowners who live there, as well as the renters. It would discourage neighborhood involvement by residents as they would be primarily transient and not vested in the neighborhood.

» **Please refer to Section 4.1, Housing and Socioeconomics, and Appendix A for a discussion of the potential effects on housing economics.**

Alternatives 2,3 would increase lot coverage and increase runoff. It would also overburden the utility infrastructure designed and sized for single family neighborhoods

» **Thank you for your comment. Please note that none of the alternatives contemplates changes to the overall lot coverage limit.**

## Revello, Katharine

Any kind of increase in density in single family zoning is excellent!

- » **Thank you for your comment. The comment is noted.**

ADUs should be allowed in front yards, or anywhere on the property with enough room. Limiting this to the backyard doesn't do anything but influence aesthetics, it's an arbitrary line to draw.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. DADUs can be located in front of the main house if it is outside of the required front yard. Please see Exhibit 2-6 in Chapter 2, Alternatives, that illustrates required yards in single-family zones.**

## Richmond, Lisa

I strongly support Alternative 2. I am a homeowner who wants to add a DADU on our property with an existing ADU, in order to provide short-term rental income and long-term accessible housing options for our family's health and mobility issues. Removing the parking requirement is the single most important step for us to enable construction of a DADU, and is a critical and welcome part of this alternative. Alternative 3 requires MHA participation for the second unit, and that additional fee would make it that much harder for us to make the numbers work to add a DADU.

- » **Thank you for your comment. The comment is noted.**

NOTE this appears to be the incorrect link. But I can just say that I know parking is the thing my neighbors worry the most about. In reality, there is plenty of parking on our street, and the folks that complain about it often have garages full of yard equipment and bikes that they choose not to use for their cars, so I honestly don't share their concern. Removing the parking requirement is the single most important change in this proposal that will allow our family to construct a DADU, and I strongly support Alternative 2.

- » **Thank you for your comment. The comment is noted.**

Again, I support Alternative 2. DADUs and ADUs won't make a significant impact to the appearance of our neighborhood. But I think that having more people living in my neighborhood will significantly increase its liveliness, feeling of safety, and the number of businesses that can be successful nearby.

- » **Thank you for your comment. The comment is noted.**

I support Alternative 2. However, I'm concerned Alternative 2 doesn't do enough to encourage more housing options in single family neighborhoods. Like most people in Seattle, I'm really concerned about the growing affordability crisis that is affecting my neighbors and co-workers. Seattle can't address our housing challenges through the small gesture of making DADUs and ADUs easier to build. Since single family neighborhoods are the bulk of our land use, we need to go further to incorporate a sensitive increase in housing in these areas.

- » **The comment is noted. Please see the frequent comment response regarding housing affordability.**

This proposal has suffered from an unfortunate series of delays. I hope it can now move quickly. Our family has been anxiously waiting for this change so we can build our DADU. Thank you.

- » **Thank you for your comment. The comment is noted.**

From the analysis, it appears Alternative 2 would result in less physical displacement and the most (although still modest) increase in housing alternatives. I support Alternative 2. Encouraging a more vigorous DADU building program could result in even more DADU construction, but costs and financing are the big obstacles. Our family's ability to build a DADU is very much defined by cost and ability to get funding. I would like to see the city tackle the financing issue directly to encourage more DADU and ADU development.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

### Roberto, Michael

I'm excited for this to finally come into effect!

- » **Thank you for your comment. The comment is noted.**

### Robideau, Jason

Eliminate any parking requirements!

- » **Thank you for your comment. The comment is noted.**

I support more housing EVERYWHERE in the city and this proposal is one of the few options we have to positively impact our housing supply on the table. If we are serious about facing the challenges of climate change and housing affordability, allowing gentle infill in the most populous city in the northwest is an easy yes. I encourage the swift implementation of the alternative 3 of the DIES!

- » **Thank you for your comment. The comment is noted.**

I support Alternative 3, and any alternatives that increase the number and size of units allowed.

- » **Thank you for your comment. The comment is noted.**

### Rooney, Mike

It is essential in "Option 2" that there is no requirement for owner occupancy (as written). If there IS an owner occupancy requirement, banks will not use the additional unit(s) as collateral, therefore there will remain no primary funding mechanism for creating these units and the city will get what it currently has. If banks can use a LEGAL, non-owner occupied, two or three unit property as collateral, there are plenty of funding opportunities to create the additional units.

- » **Thank you for your comment. The comment is noted.**

I support Option 2.

- » **Thank you for your comment. The comment is noted.**

## Rulifson,, Brian

The Map (on your website introducing the Draft EIS) showing the area with the scope of the EIS has but two items in the Legend and one of them mis-identifies the map color signifying Urban villages. Urban villages are shown in GRAY, whilst the legend identifies them as WHITE.

This kind of level of inattention to detail has been common throughout this process and serves to misinform, misguide, and erode trust in the data presented. If you can't get your FIRST AND MOST BASIC MAP correct, why would a reasonable person to expect the data in the 52MB file to be correct?

- » **Thank you for your comment and pointing out the information missing in the legend. We have updated the map on the website to match the map included in both the Draft and Final EIS (please see Exhibit 2-1 in Chapter 2 Alternatives).**

## Salomon, Andres

I prefer Alternative 2. The Owner-Occupancy Requirement is classist and unconstitutional, and needs to simply go away. Parking requirements encourage car ownership and cars are the largest source of carbon emissions for Seattle. Parking requirements also need to go away. Finally, anything we can do to encourage people to build ADUs should be prioritized. ADUs (and especially AADUs) are naturally affordable housing that can keep people from falling into homelessness.

Though it is strange that when it comes to the number of ADUs on lots in single family zones, Alt 3 is more permissive than Alt 2. Alt 3 allows both an AADU and DADU, or 2 AADUs. Alt 2 only allows the former. This is the only instance where I prefer the option from Alternative 3.

- » **Thank you for your comment. The comment is noted.**

We have a housing crisis. Economic displacement is rampant. Homelessness is rampant. There are simply not enough homes. The lack of supply drives up rent, and results in people being thrown out onto the street. Are you serious with this "Aesthetics" nonsense?

- » **Thank you for your comment. The comment is noted.**

## Savel, Shirley

Hi my name is Shirley and in 2008 we were fortunately to move into a small 2 bedroom DADU our landlady built on her property in southeast Seattle. At the time we were 3 and didn't need a lot of space and it worked out well for our family for 5 years until we had another child and more space was needed but we would have gladly stayed in the small until. We had a small vegetable garden and it was really nice. Later on I found out this was a pilot project and haven't seen more of these units built as other people find DADU and ADU dwellings difficult to build due to the way in which the city regulates them. I am asking that you allow more diverse dwellings so families can choose to live in these space. Not everyone wants to live in a huge house. Compared to other places we rented this was the most space and energy efficient house we have ever lived in. Please continue to make it easier for people to choose to build these and provide more housing choices.

- » **Thank you for your comment. The comment is noted.**

## Scheer, Gabriel

Get rid of parking minimums. Start charging for curb cuts/access to private driveways. Implement paid on-street parking city-wide. If we're serious about achieving climate goals, congestion reduction, and

equity, its time to significantly change modesplit. Pour the money that can be attained above into supporting alternatives to auto-based mobility.

- » **Thank you for your comment. The comment is noted.**

Love it. More please.

- » **Thank you for your comment. The comment is noted.**

This is a great idea. I strongly support this and more such efforts to remove barriers to dramatically increasing the density of Seattle housing as well as the overall number of units. We should significantly reduce the portion of the city zoned single family, and add as much density & new housing, particularly multi-unit and multi-bedroom (to support families) housing.

- » **Thank you for your comment. The comment is noted.**

Changes will result. The flow of people into Seattle isn't stopping, and barely slowing. Climate change will exacerbate that. Time to dramatically increase building.

- » **Please see the frequent comment response concerning the positive impacts of the proposal.**

## Schletty, Mark

Even if alt. #2 or 3 are chosen, the no off street parking changes are completely unacceptable. People have cars, like it or not, and not providing off street parking is a direct assault on the neighbors livability.

- » **Thank you for your comment. The comment is noted.**

Alternate 1 is the only acceptable alternative. The others are a formula for destroying Seattle's livability.

- » **Thank you for your comment. The comment is noted.**

The city's infrastructure is already insufficient to handle even alt. #1, and totally unable to handle alt. #2 and 3. Kill this whole program. It is a total giveaway to developers at the expense of Seattle's citizens.

- » **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

## Schlosser, John

Seattle is a city of hills and valleys. This topography should be taken into account when setting maximum DADU heights. For example, the main house may be low, with lot sloping up to the rear where the DADU is built. In these cases, no one wants the DADU to be nearly as tall as the main house. Please consider height rules that take these topographic conditions into account.

- » **Please see Section 4.3, Aesthetics, for graphics and text added related to development on a sloping site.**

As described in the EIS (Exhibit 4.5-3), the proposed ADU rule changes would, compared to current regs, add only 144 units/yr (Alternative 2) or 121 units/yr (Alternative 3). This is miniscule, in context. There are 100-150 units in one good sized apt building!

I do not oppose reasonable changes in ADU regs, but we should make clear to all that ADU's will not have much impact on housing supply & affordability. They will add very few units and the rents will likely be HIGHER than many apartments.

The most critical and sensitive element of Alternative 2 is to eliminate the Owner-occupancy requirement. Please do not do this. This idea is promoted by small landlords, who will inevitably cut up homes & build DADU's to maximize the number of units. Note that the bulk of the added units under Alternative 2 (and Alt 3) are estimated to be "2-ADU" properties. Consider this from the point of view of the neighbors of such a home: before they had a family next door, but after Alt 2, they have three units next door, including possibly a new 20-25' structure (DADU) covering the backyard.

Are these impacts worth it, when the over increase in housing supply is miniscule (see above)?

» **Thank you for your comment. The comment is noted.**

Please consider a software application to help owners judge the suitability of lots for DADU's. Few are, because they already are at 35% lot coverage, or don't have the side yard space, or don't have the parking space, or have space but it is far (ie "expensive") from the side sewer.

The company "Cover" in LA, for example, seems to offer this:

<https://la.curbed.com/2018/3/9/17101336/prefab-los-angeles-adu-back-house>

» **Please see Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and support homeowners interested in developing an ADU.**

The EIS did not cover development costs sufficiently. DADU's I see built are expensive projects. Thus they become "luxury" housing, rather than a low-moderate income solution.

For example, I did not note cost-related discussion of \$20,000 sewer-connection fees charged by our sewer utility for new DADU connections. Regardless of zoning/land use rule changes, these costs, and similar, will deter owners/developers from building even the limited number of DADU's that are projected.

» **Independent of the Land Use Code changes evaluated in this EIS, the City is exploring options to lower the upfront costs associated with ADU production. See Chapter 1, Summary, and the updated analysis in Section 4.1, Housing and Socioeconomics, for additional details.**

1. The largest impact of Alt 2 and Alt 3 would be to add more "2 ADU" properties--with associated off-street parking for at least 1 unit. Where there is no alley, this will result in new curb cuts--the bane of pedestrians, strollers, wheelchairs and other sidewalk users. Please consider restricting curb cuts as part of any ADU changes.

2. Despite access to transit etc, people in units without designated parking will still own cars--absent any deterrent. When changing rules to increase the # of units without parking, please consider requiring leases ask renters to agree to not have a car.

» **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative would remove the off-street parking requirement for ADUs.**

## Schueler, Dashel

Thanks for the opportunity to provide feedback on this plan. I own a home in Mount Baker neighborhood, just outside the Mount Baker urban village, in District 2. I live there with my wife, two young daughters, and a roommate. I'm writing to indicate my very strong support for the plan to expand the opportunity to build ADUs throughout the city. I want more people to be able to afford to live in my wonderful neighborhood, and I see density as crucial to fighting climate change.

I also support the recommendations of MOAR, including:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.
10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.
11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification.

Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Schuldt, Dave

We really need more housing and ADUs are a small part of the solution. The city should move forward with this ASAP. An ADU would be a nice boost to retirement income and will allow some seniors to stay in Seattle. All the people moving here have to go somewhere.

- » **Thank you for your comment. The comment is noted.**

## Schumann, Frank

I see no reason why we need to allow DADU's to destroy our traditional single-family neighborhoods! The Seattle Times just today had an article titled "Seattle renters score big as landlords dangle freebies to fill empty apartments". There's now a glut of apartments:

"At newly opened properties, 40 percent of all brand-new units across the region are sitting empty "" that works out to about 5,000 units that have never been lived in, according to Apartment Insights/RealData. About 10,000 additional units across King and Snohomish counties are sitting empty at buildings that aren't brand new, largely because of regular turnover."

No DADU's!!

- » **Thank you for your comment. The comment is noted.**

Parking's impossible anywhere now. All apartments should be required to have parking for their tenants. You want us old folks to ride bike-shares downtown to see the doctors. Wait til you're 80!!

- » **Thank you for your comment. The comment is noted.**

## Schwab, Erik

Please support the most flexible options for increasing the number of new Accessory Dwelling Units.

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity through land use planning, and inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots

fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Scrivner, Kim

I support the city easing restrictions on both AADU's and DADU's. I personally lived on a property where the house had two units (I assume these would qualify as AADU's) and I lived in the DADU in the backyard. This was a wonderful living situation as each unit has some semblance of privacy, we all

enjoyed different areas of the yard and we able to enjoy neighborhood living space, access to a yard and the outside without being crammed in a building and I was even able to garden. I support expanding the square footage maximums as well as height limits but the height limits should be carefully considered due to the impact of privacy and light on neighbors. DADU's should not be allowed taller than two-stories plus dormers. Otherwise, this can have a significant impact on neighboring properties, particularly in single family or RSL neighborhoods. I do not believe DADU's should be allowed to be three stories.

I also support DADU entrances facing rear or side lot-lines. The cottage I lived in faced the rear lot line that had high hedges. This provided me much desired privacy from the main house and the shared yard. It also provided me with a tiny oasis which was a blessing for living in such a small living space.

Regarding owner occupancy, it is ridiculous to require where an owner of a property actually lives. These spaces provide much needed housing and do not require owners to live on-site. I've lived in both a DADU with no owner on site and an AADU with the owner on-site. Both functioned just fine.

» **Thank you for your comment. The comment is noted.**

### Shafchuk, John

I vote for Alternative 2

» **Thank you for your comment. The comment is noted.**

### Shoegnome Architects,

Option 2 is by far the best option. Option 3 is crazy. Limited FAR to .5 is anti-growth and the exact opposite of what Seattle must be doing. Only Option 2 increases options and encourages more houses.

» **Thank you for your comment. The comment is noted.**

More density where ever possible.

» **Thank you for your comment. The comment is noted.**

### Siepak, George

Seattle's strength is in its neighborhoods. This is a sell out to developers.

» **Thank you for your comment. The comment is noted.**

Doing all this without parking is a terrible idea. Without adequate parking the streets will be even more crowded. Developers must provide adequate parking.

» **Thank you for your comment. The comment is noted.**

### Smyth, Don

Prefer alternative 3. Best choice to increase housing density in the short term.

» **Thank you for your comment. The comment is noted.**

Reduce or eliminate the cost of the impact analysis -- too burdensome.

» **Thank you for your comment. The comment is noted.**

## Stahre, Grace

I do not have the time to address each item individually. I am a homeowner in the Central District and we are interested in adding a DADU to our property. Here are the items I do and do not support.

There should be NO PARKING REQUIREMENT because requiring parking for ADUs that means we're privileging space for cars over housing for people. It is likely that personal cars are going to be on the decline as automated cars take to the road anyway.

Lots should be allowed 2 ADU's and a DADU; we want to encourage the subdivision of existing large houses, especially for empty-nesters.

I do NOT believe in removing the owner-occupancy requirement because I have seen the results of AirBnb and the catastrophic loss of neighborhood feel due to some many absent owners on our block. There are people waiting to capitalize on this and will make properties into squashed, money making machines. There isn't a shortage of owners who CAN afford to own. If the situation were different, then the other option might be amenable. I do believe that erasing the owner occupation requirement would unleash a race to destroy the neighborhood, and even more deadbeat landlords. I don't believe this world needs to be accommodating of people who accumulate property. That is why we are in the mess that we are.

Incentivize affordable rentals by eliminating development charges for units when owners commit to holding them as rentals affordable to people making under 60% AMI for 15 years - but only if you are ACTUALLY going to enforce this.

Incentivize green building standards like passivhaus and "living buildings", by eliminating development charges on any units built to those standards. But only if you are going to enforce it.

I don't believe in lowering the lot square footage, as we already are suffering from a lack of light and diminishing open space that has been proven to have a negative psychological effect on people.

I do believe that the size of a DADU should be allowed up to 1200 sq feet, not including a garage. Being able to build a reasonable 2 bedroom home that is not just a "starter" makes more sense.

» **Thank you for your comment. The comment is noted.**

## Stair, Sherri

Give incentives for trees and rain gardens but do not require them.

» **Thank you for your comment. The comment is noted.**

Do not require parking spots. Build out public transit and sidewalks.

» **Thank you for your comment. The comment is noted.**

A balance between affordability, tree canopy, and some minimum aesthetics is a common sense approach. I don't buy what can be an elitist and racist 'neighborhood character' line on single family

dwellings in the city. We can have a reasonable balance of trees, house-sharing, ADUs, and a place where non-rich elite can simply live.

» **Thank you for your comment. The comment is noted.**

ADUs will help elderly and low income owners and long-term renters to stay in single family homes via the cost-sharing of an ADU on the property. As a senior who downsized from a large single family home, I was unable to find affordable housing and would love to find a ADU in the city so that I don't have to leave my home town and support system. Support communities by offering incentives for long-term rentals. YES to getting ADUs available ASAP.

» **Thank you for your comment. The comment is noted.**

Wallingford, Ballard, Wedgewood, and other close-in neighborhoods should be zoned for ADUs. Otherwise they will either become rich white ghettos or apodments taking over the neighborhoods. ADUs allow a neighborhood character and community.

» **Thank you for your comment. The comment is noted.**

## Suryan, Sara

Based on this analysis, I still agree that Alternative 2 is the most comprehensive and sensible plan.

» **Thank you for your comment. The comment is noted.**

I fully support Alternative 2 as laid out in the above chapter.

» **Thank you for your comment. The comment is noted.**

I support all outcomes that will increase the number of affordable housing options, especially in high cost areas and zones that are currently single family use only. We need more affordable housing.

» **Thank you for your comment. The comment is noted.**

The visual character of single family zones is a benign point when you understand that we need more affordable housing.

» **Thank you for your comment. The comment is noted.**

We need to increase public transit options if we are going to increase affordable housing. Most people who are income or housing insecure can not afford a car, and need to utilize public transit.

» **Thank you for your comment. The comment is noted.**

We should work harder to decrease the areas designated as single family homes, and increase the residential urban hubs and multi family areas

» **Thank you for your comment. The comment is noted.**

## Szeles, Jean

This needs to happen sooner than later. This is a viable option for so many of us if the lot size is reduced and some of the restrictions are lifted and minimized. Thank you

» **Thank you for your comment. The comment is noted.**

Parking can be an issue. However, Columbia City and so many other places are accessible because of the light rail, buses, UBER, etc. I don't think parking should be mandatory.

» **Thank you for your comment. The comment is noted.**

We need to reduce barriers to make housing options available and affordable for so many folks in Seattle. Reducing the mandatory lot size and minimizing, if not eliminating, restrictions as to years of owner occupancy, parking, etc, will help make building ADU'S a possibility for those of us that are interested. Seattle is growing and changing and we need to make housing options grow and change as well.

» **Thank you for your comment. The comment is noted.**

Again, Seattle's growth and how costly it is for many to live here could result in more people leaving if housing options do not vary and become more affordable for all.

» **Thank you for your comment. The comment is noted.**

Housing is a critical need and something everyone deserves to have...not be entitled to have but deserves to have. The number of homeless and the lack of affordable housing is at a critical stage and has been for years. There need to be more options.

» **Thank you for your comment. The comment is noted.**

Yes, aesthetics in the neighborhoods would change. This does not mean they have to change for the worse. All the condos and townhouses look the same anyhow. Some backyard cottages and ADU's are very sweet and artsy adding appeal to the neighborhoods.

» **Thank you for your comment. The comment is noted.**

## Thompson, Schuyler

My name is Schuyler Thompson. I live in district 5. I want more housing in Seattle, because the city is experiencing a massive economic boom, and excluding people who want to move here but can't afford it due to the housing shortage isn't fair. We talk a lot about reducing inequality, and liberalizing zoning is the number one thing local governments can do to help.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters

(27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Thomson, Alexander

I believe that Alt 2 best fits the goals of the city, to provide affordable housing for all.

» **Thank you for your comment. The comment is noted.**

The density increases in SF zones that result in Alt 2 changes are minimal and not a large impact.

» **Thank you for your comment. The comment is noted.**

## Transit Riders Union,

The housing situation in Seattle has reached a crisis and we need all kinds of solutions. This plan won't solve all our problems but it will help both the home owner and renter.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

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6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

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8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of

available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

### Trumm, Doug

We should strive to generate the most housing, which gives Alternative 2 the edge. That said, expanding the mandatory affordability program has its own attraction as does having two AADUs per lot. We should mix and match between Alternatives 2 and 3 to generate the most units and affordability. We should not have an owner-occupancy requirement because limit housing options.

- » **Thank you for your comment. The comment is noted.**

I think rowhouses are very aesthetically attractive and we should encourage them rather than encouraging parking eating up frontage.

- » **Thank you for your comment. The comment is noted.**

MHA should apply truly citywide. I don't think ADUs should face the fee if single family homes do not, but it does seem a shame that teardowns creating million-dollar homes generate no MHA fees. Mansions should contribute to affordability too.

- » **Thank you for your comment. The comment is noted.**

We should consider using a mansion ban like Portland is considering to driving production away from more million dollar mansions and toward moderately-priced housing.

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes an FAR limit but exempts floor area included in any ADU to incentivize ADU production.**

Please pass ADU reform as soon as possible and help more working class people stay in Seattle.

- » **Thank you for your comment. The comment is noted.**

No parking requirements. We are facing a climate change crisis and requiring car ownership is regressive and harmful.

- » **Thank you for your comment. The comment is noted.**

### Trumm, Doug, The Urbanist

We do not need parking requirements, and including them could block projects. Most neighborhoods have curb parking that is not beyond the 85% threshold of use. The only rationale I see for including them is appeasing opponents.

- » **Thank you for your comment. The comment is noted.**

Next stop fourplexes everywhere. I think MHA would apply to ADUs because I think the next step is to make something like fourplexes or even LR2 the base zoning everywhere. If Seattle wants to continue to be a climate action leader it should push growth to the fringe of the region. If Seattle wants to continue to be an economic engine, it should build housing to support that without massive economic displacement. Single-family zoning should be a relic of Seattle history, much like racial covenants and redlining.

- » **The comment is noted. The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code and are outside the scope of this EIS.**

ADUs would be very compatible with single-family zones. They are not intrusive and in fact returns Seattle's zoning closer to its original level.

- » **Thank you for your comment. The comment is noted.**

I like a combination of Alternatives 2 and 3 guided by the principle of getting the most homes build but also implement MHA to maximize affordability but with streamlined permitted and reduced fees to not stifle development. The status quo is not good since it makes ADUs very hard to build in much of the city.

- » **Thank you for your comment. The comment is noted.**

The ADU reforms will bring a modest increase in population growth and should in no way "break the camel's back" when it comes to utilities. Let's not let this red herring block this needed reform.

- » **Thank you for your comment. The comment is noted.**

We need to get more affordable housing out of single-family zones. We should make it easy to build ADUs.

- » **Thank you for your comment. The comment is noted.**

We should not let aesthetics stifle housing production. Just need some base minimum standards.

- » **Thank you for your comment. The comment is noted.**

## Tucker, Jeffrey

More ADUs would improve neighborhoods aesthetically. It would create more things to look at, and permit more people to live in Seattle's most aesthetically pleasing neighborhoods.

- » **Thank you for your comment. The comment is noted.**

It would be good to increase the building density, population density, and scale in the affected neighborhoods, such as mine. More homes means lower housing costs and more varied options for homebuyers. More people means more neighbors to talk to, share recipes with, help out with household tasks, babysit, more kids for my son to befriend, more community, more taxpayers, more business patrons.

- » **Thank you for your comment. The comment is noted.**

My name is Jeffrey Tucker. I live in District 1, with my wife and soon-to-be-born son. I support more housing because Seattle is in the midst of a historic housing shortage. I think Western Washington, and Seattle in particular, is one of the most beautiful, temperate, lovely places in the world to live, and I want more people to have the opportunity to live here. My house is on a split lot, which is the only reason we

could afford to buy it. The changes to ADU regulations proposed in Alternative 1 are a good start but do not go far enough. We have plenty of land, and many willing homeowners and would-be buyers, and builders standing by, all happy to build more homes on the land we have -- permitting them to do so is a small but helpful step in the right direction to ameliorate our housing shortage.

I would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
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8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Treating "reduced availability of on-street parking" as an environmental impact is practically Orwellian. Public policy that subsidizes abundant, cheap car ownership is obviously bad for the environment. If this policy change makes parking harder, that will be good for the environment

» **Thank you for your comment. The comment is noted.**

## Unterschute, Keith

Pre-approved Designs: I would suggest that you look at designs done by a local architect named Ross Chapin at <https://rosschapin.com/>. He has quite a variety of small cottage designs such as the Lissie Cottage, Lisette Cottage and Gilann Cottage.

» **Thank you for your comment. The comment is noted.**

## Van, Paul

My name is Paul Van Bodegom and my household is made up of two adults working full time

I live in District 4. I want more housing because given recent and projected job growth there is a lack of housing in the area, especially round transit and other public amenities.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

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11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.
  - » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## van, Rhys

lose parking requirements, they're an undue burden and prevent many otherwise usable lots from adding ADUs.

- » **Thank you for your comment. The comment is noted.**

Access to light, retention of trees, and promotion of new trees and vegetation ought to be the only aesthetic concerns the city dictates.

- » **Please see the frequent comment response concerning impacts on tree canopy.**

more neighborhood mixed use zones, fewer exclusive SF zones

- » **Thank you for your comment. The comment is noted.**

Given the current housing affordability crisis the city should be doing everything possible to reduce barriers to construction of new housing. This is especially true of housing outside of dense urban centers. It's not only unjust to only allow new housing in dense, neighborhood villages, we need more home types in between apartments and single family homes. Townhomes, rowhouses, ADU's, etc.

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## Vander, Ann

The requirement to build off-street parking spaces comes at the expense of the greenery surrounding our dwellings. Trees, gardens, shrubs, lawns are eliminated with a resulting detriment to our physical and mental health. I favor Alternative 2.

» **Thank you for your comment. The comment is noted.**

I favor Alternative 2 which is most consistent with an affordable Seattle where teachers and other human service providers can own houses within the city limits.

» **Thank you for your comment. The comment is noted.**

I favor Alternative 2, that will stop demolition of modest houses and building oversized houses in our residential neighborhoods.

» **Thank you for your comment. The comment is noted.**

I favor Alternative 2.

» **Thank you for your comment. The comment is noted.**

## Varley, Matthew

It is unfortunate that we are not considering the reclamation of on-street parking as more space for housing or public transit. The public roadway should not be used for the storage of private property.

» **Thank you for your comment. The comment is noted.**

Doing nothing will have the worst impact on the environment of all options.

» **The comment is noted. Please see the frequent comment response concerning the positive impacts of the proposal.**

The economics are a tiny step towards alleviating the housing crisis, but it is nowhere near enough.

» **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

The proposed land use does not create enough density given the lack of housing in Seattle and the environmental costs of building even more suburbs. More please.

» **Thank you for your comment. The comment is noted.**

Doing nothing will create the worst environmental impact of all the alternatives. Doing nothing will force new construction further outside the city with corresponding increases in car traffic. The environmental impact of doing nothing far outweighs the impact of changing the rules.

» **Thank you for your comment. The comment is noted.**

Aesthetics won't be impacted, but even if they were, any aesthetic impacts pale in comparison to our housing crisis.

» **Thank you for your comment. The comment is noted.**

## Vinal, Ariel

Compatible design is an important factor in maintaining the character of our older existing neighborhoods.

» **Thank you for your comment. The comment is noted.**

I think it would be unfortunate to lose the nature of our single-family zones. The existing (Alternative 1) allows for significant development in these neighborhoods. I do feel it is important that there is a resident owner in occupancy at least 6mos. of the year to have a 'hands on' view of maintenance.

» **Thank you for your comment. The comment is noted.**

I feel there should be a restriction high density zones to areas where adequate public transportation exists.

» **Thank you for your comment. The comment is noted.**

I think is is critically important to require off street parking for at least one vehicle when adding additional units. Our neighborhood streets are already congestion with existing vehicles. Many are reduced to single lane which hinder traffic and pose a safety concern for children and pedestrians in general.

» **Thank you for your comment. The comment is noted.**

## Vrignaud, Andre

I strongly support Alternative 2, as it excludes garage space from total size consideration. This make it much easier to expand an existing garage and create a useable DADU above it. Alternative 3 is also better than the current status (Alternative 1/no change), but not as strong as Alternative 2 in my opinion.

» **Thank you for your comment. The comment is noted.**

## Vrsek, Jamie

While I am super excited about the progress that's being made and am absolutely in favor of 99% of the proposed alternatives, I am DEEPLY concerned about the maximum gross floor area restrictions proposed in Alternative 3. Including garages and storage areas in gross floor area calculations for DADUs effectively eliminates the option to build a DADU for many, if not most homeowners in Seattle. This factor is a main reason why more DADUs have not been built under the current rules.

Under Alternative 3, in order to add DADU living space, whether rent \$-generating or not, homeowners would need to eliminate the lot's garage space in order to build the DADU in the first place. Eliminating garage parking will obviously increase the demand for on-street parking to beyond capacity for most neighborhoods, and does not make sense. Especially while adding occupants to the lot via the DADU! Garage space should absolutely be excluded from gross floor area. Alternative 2 gets this aspect right.

Obviously, any homeowner taking on the cost of building a DADU wants to maximize it's use and provide desirable, livable, (and hopefully affordable) housing for the DADU occupants. While some garage space may be maintained by building a DADU on top of garage at 500sqft or less, this option is not desirable, practical, or economical, and will certainly be under-utilized. My aging parents do not want to live in space less than 500 sqft, nor would a small family. People who most need an affordable option (i.e., those on a fixed income, or families with children) are generally in need of more than a micro-studio sized apartment. 1000 sqft of living space is much more desirable, versatile (2 bedrooms are possible), and

economically viable to build. DADU on top of a garage is the MOST desired and reasonably attainable (affordable to build, easier to plan and design) form of DADU for homeowners, so why on earth would we effectively eliminate that option? The other aspects of Alternative 3 make good sense, but this one is such a huge miss that I seriously hope you'll reconsider. The cost of adding "affordability" by way of DADUs falls on the homeowners, so please don't make it impractical. As it stands, Alternative 2 is the better option if you want to see change happen.

» **Thank you for your comment. The comment is noted.**

## Wadsworth, Tim

I own a home in North Seattle but have been living out of state due to my work for the last few years. I rent out my house and the backyard cottage on the property lies vacant. This is both a financial burden to me and a significant waste of house stock in Seattle. While I support most of the issues promoted by MOAR as discussed above, I want to voice my especially strong support for removing the owner occupancy requirement. That said, I encourage the final EIS to include:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
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elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

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11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

### Wagner, Annie

Alternative 2 produces the most new housing, which should be the number 1 priority.

- » **Thank you for your comment. The comment is noted.**

I strongly prefer Alternative 2.

- » **Thank you for your comment. The comment is noted.**

### Wallace, Danielle

I support financing support for low income households, especially in communities of color, to have access to building ADUs so that there are more affordable housing options in areas of high displacement risk.

- » **Thank you for your comment. The comment is noted.**

I support this

- » **Thank you for your comment. The comment is noted.**

Additional parking should not be required.

- » **Thank you for your comment. The comment is noted.**

### Warburton, Neil

Prefer EIS Alternative 2

- » **Thank you for your comment. The comment is noted.**

### Warren, Ruth

ADU and DADU will provide urgently needed affordable housing and help homeowners on fixed income stay in their homes with extra rental income. I support either Alternative 2 (best) or Alternative 3.

- » **Thank you for your comment. The comment is noted.**

## Wedekind, Blake

Building ADUs allows people without access to many public goods to integrate into neighborhoods with better schools and economic opportunities, without having to spend their whole paycheck on rent. This is how we bridge the gap between limited economic opportunities for the disadvantaged. We need more ADUs.

» **Thank you for your comment. The comment is noted.**

Increase density! There comes a time when the character of a neighborhood loses its value - and that's when no one can afford to live there.

» **Thank you for your comment. The comment is noted.**

YES. Please remove barriers to building ADUs. ADUs are one of the best policy tools we have to address our affordability crisis, and we need to be able to streamline the process of getting them built.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

## Wehri, Peter

By their very nature, ADUs are unlikely to have significant impact on aesthetics. They are either within an existing structure or in the backyard and small. The building code itself is far more impactful, as it can be exploited for max lot coverage, tree removal, etc.

» **Thank you for your comment. The comment is noted.**

Overall, if I had to choose, I would choose Alternative 2, with its flaws. See last question.

» **Thank you for your comment. The comment is noted.**

I don't believe land use impacts are significant in any of the proposed changes. Greater density is a necessity, so the impact is mostly positive. The exception may be on the tree canopy. As a real estate investor/realtor who moved here 10 years ago, my impression is that the tree canopy is not really well protected, and my fellow investors generally cut first and apologize later. Increasing DADUs can only add pressure to the canopy. Also, there is always negative impact on groundwater and stormwater runoff when structures are added.

» **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use, and exceptions added to the Preferred Alternative to preserve trees.**

1. There really is no practical reason to limit the lot size where DADUs can be constructed; the setbacks and other code requirements will keep backyard units within reason, so the minimum size should be dropped. The homeowners with small lots are more likely to need and benefit from a rental or family unit on their property. This is just an old mindset and we should let go of it.

2. As a real estate broker/investor, I am certain the key reason that Seattle is so slow to build backyard cottages is economic, not current regulation, and I don't believe any of these proposals will significantly accelerate production. The economic factors should be foremost. Permitting and fees should be cut dramatically for DADUs; 50% is reasonable, 10% is not. From a business perspective, RE investors are not drooling over any of this, only architects--who do not grasp the economics, but always believe they do--are interested in this issue. Cut the cost and you will get more units.

3. The parking requirement is a possible cost issue, so as in #2 above, it should go. But I am skeptical about it making a large impact. I see no need to require parking, maybe for a 3rd unit, as in Alternative 3.
4. I have no problem with a residency requirement. We RE investors generally increase housing costs, and a house with ADU is not especially attractive in Seattle. Must have 3 units or more to get me interested.
5. What my architect friends have right on is the great value of increasing height limits. It actually does impact cost and feasibility. So absolutely, heights restrictions should be increased.
6. If you want the middle and lower class homeowners to build ADUs, then we must, must, make the permitting faster and less complicated. The average Joe can't be expected to drop \$20k on an architect to marshal things through on such a small project. The permitting struggle is serious for the average homeowner, and will kill many of these projects. Fast track it and give them dedicated all-in-one ADU code specialists.
  - » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

There is likely to be some impact on parking availability, but we appear to have the capacity. My question is whether it will disproportionately effect low income residents? As density increases, public transit must increase as well. The fewer restraints on density near transit hubs the better.

- » **Please see Section 4.1, Housing and Socioeconomics, for discussion of estimated ADU production and number of tear downs by neighborhood profile. The analysis suggests that lower-income neighborhoods will see fewer ADUs built over the 10-year period.**

## Weill, Jason

Much of Seattle's single-family housing was built hastily in the mid 20th century in response to previous population booms. We should preserve a small representative sample of historically significant housing while also acknowledging the need for higher-density housing to accommodate the city's shrinking household sizes.

- » **Thank you for your comment. The comment is noted.**

I urge the city to proceed with increased ADU permits pursuant to the findings in this EIS.

- » **Thank you for your comment. The comment is noted.**

I support Alternative 2. Our city will benefit from additional housing units in residential areas. In addition, we should not mandate that more of our city be designated for vehicle storage. We should instead be encouraging residents to think outside of the previous worldview of parking being expected outside one's residence.

- » **Thank you for your comment. The comment is noted.**

Building additional housing units will limit the amount of economic displacement. The choices Seattle has made to reduce residential construction have been far more damaging to the city's accessibility than any ADU project would be.

- » **Thank you for your comment. The comment is noted.**

Seattle's street parking is extremely underpriced with permits selling for as little as \$65 per 2 years in neighborhoods such as Capitol Hill where off-street parking commands thousands of dollars per 1 year. We should not plan for a 21st century where people still insist on parking their personal vehicle right

outside their home for free. If people would like to rent the city's land for vehicle storage, they should pay a fair market price for doing so.

- » **The proposal evaluated in the EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to the Residential Parking Zone (RPZ) program and other on-street parking regulations are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

I agree with the city's assessment that there would be a modest impact to fire, police, and utility services by permitting ADUs in greater numbers than today.

- » **Thank you for your comment. The comment is noted.**

## Wheeler, Mattie

I have lived in Seattle my whole life (33years) as a lower end middle class citizen and I want to strongly encourage our city to select Alternative 2 for Land Use Codes with ADU/DADU. DADU have the ability to address many issues the city is facing currently (some of which directly impact me and my family). The largest issue is affordability for residents in the city. By allowing homeowners to rent out both dwelling units or build additionally units on smaller properties increases the supply for folks looking for rentals, decreases the burden of the on current homeowners (particularly mid to low income owners who might have a larger benefit from additional income per month), and allows for historical neighborhoods to maintain their charm.

For me (the youngest in my family), I am the only one out of a family of five who is able to still live within city limits. For my co-workers and friends, many are completely unable to live within the city limits anymore (up until two-three years ago they had lived here for many years) and are now commuting anywhere from an hour or two to still work within the city. This does not help our city strive for our greener goals nor is it possible for families who are even lower income brackets to afford the high cost associated with such travel.

I can go further, however, in short Alternative 2 would make Seattle a more sustainable city moving forward.

- » **Thank you for your comment. The comment is noted.**

## Whisner, Jack

Liberally legalized ADU could be good for householders and renters alike; there would be income for the former and housing for the latter; there would be more eyes on the street.

- » **Thank you for your comment. The comment is noted.**

Parking: there should be no parking requirement; the number of vehicles associated with a house is more closely correlated to its bedrooms and not its kitchens; single family houses with several adults may have several vehicles even if it has only one kitchen; if parking is an issue, it is better to price curb space rather than limit ADU.

Height: please allow DADU to be as tall as single family houses. This would allow narrow houses to achieve the same square feet. The impact of a tall DADU is less than that of a tall mega house.

- » **Thank you for your comment. The comment is noted.**

If an area is parked out, and data seems to show little of that, pricing should be used. In the mid-term, please consider revising the RPZ program to have higher rates that would help allocate a scarce common property resource. Could the budget process allow RPZ revenue to be targeted to local transportation projects?

Many single family areas are within easy walking distance of frequent transit service. Bus routes tend to serve corridors and not urban village nodes. Many along the corridor can take advantage of the short waits for service to gain access to the network. Frequent routes will connect with Link or RapidRide.

- » **The proposal evaluated in the EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to the Residential Parking Zone (RPZ) program are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

### White, Emily

The key to maintaining our family neighborhoods in terms of neighborliness, housing maintenance and retention of aesthetically coherent architecture is owner-occupancy. Option 3 provides that and will yield almost as many new units (1815 vs 2160) as option 2. Option 3 yields the fewest teardowns vs both option 1 and 2. Option 3 also has a requirement for affordability for a 3rd unit, which is the goal of these proposed changes, while option 2 does not. We must go with option 3.

- » **Thank you for your comment. The comment is noted.**

Very hard to believe that allowing 12 people on a single family lot will not affect parking.

- » **Please see the frequent comment response concerning impacts to parking.**

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- » **Thank you for your comment. The comment is noted.**

### Williams, Florence

I am deeply in support of Alternative 2.

- » **Thank you for your comment. The comment is noted.**

I believe that Alternative 2 will lessen the upward pressure on housing costs and will help prevent the displacement that has become epidemic in Seattle.

- » **Thank you for your comment. The comment is noted.**

I am unconcerned about the effects of AADUs and DADUs on parking and transportation.

- » **Thank you for your comment. The comment is noted.**

## Windermere Real Estate,

ADUs can offer affordable housing units without substantially altering the existing look and feel of the neighborhood. I would hope that any increases in height and reductions in set backs would be looked at very carefully to avoid backyard cottages looming over neighboring yards.

- » **Please see Section 4.2, Land Use, for a discussion of changes to height and yard requirements.**

I am supportive of MIL and AADUs and DADUs but the idea of having up to 12 unrelated people living on one residential lot is very unappealing. One of the reasons that backyard cottages are so appealing is that it is absolutely in the homeowners best interest to rent to a good neighbor as there is no one closer than the homeowner themselves. It helps families who may be struggling to stay in their home share the burden of their mortgage or retirees who want to keep their home while still doing some travelling (and having a built in property sitter), while helping someone else with a safe affordable housing option. It is the definition of win win. The ability to rent both units (or all three) out individually completely shatters the residential zoning definition. If that is your intent, just change the zoning for all SFR to triplex and be done with it. The city can save a lot of money on monitoring and compliance. In case that was not clear...I absolutely DO NOT support doing away with the requirement of owner occupancy. Thanks for the opportunity to give feedback.

- » **Thank you for your comment. The comment is noted.**

I am supportive of the preapproved plans and streamlined permit process that makes it easier and less expensive for homeowners to build ADUs and increase the number of affordable housing units.

- » **Thank you for your comment. The comment is noted.**

No one can dispute the need for additional lower cost housing.

- » **Thank you for your comment. The comment is noted.**

Please for the love of pete do not remove the need to provide at LEAST one off street parking space. Increasing street parking is making our neighborhood streets extremely narrow. In many cases two cars cannot pass each other. There are areas in west seattle with no sidewalk or curb where multiple cars are parked

in front of homes/in front yards. This is not helpful to maintaining property values.

- » **Please see Chapter 2, Alternatives, for a discussion of off-street parking requirements. All alternatives would continue to require one off-street parking house for a principal dwelling unit in single-family zones.**

## Withey, Joe

My name is Joe Withey and I live in West Seattle District 34. I would like more housing to prevent working class people from being priced out of Seattle. I support Alternative 2 because housing options should not be restricted due to parking. My house is close proximity to a bus where a car is not needed and close proximity to grocery stores and other necessities.

- » **Thank you for your comment. The comment is noted.**

## Woland, Jake

Alternative 2 is a great direction. Alternative 3 encumbers the process of implementation more with the additional fees - the fact that this is adding stock, likely of an affordable nature should give it credit against paying into other housing affordability goals. Alternative 1 was difficult to make feasible, onsite parking sucks up space that has so much greater value (open space, stormwater mitigation, social space)

» **Thank you for your comment. The comment is noted.**

Alternative 2 is the best encouragement for appropriately adding density to the City

» **Thank you for your comment. The comment is noted.**

## Wood, Kyle

I perceive that there are many homeowners in the city who wish to add much-needed housing stock by adding an ADU or DADU to their properties. For many, the outdated, car-centric rule requiring an additional parking space per ADU or DADU is a significant obstacle. Removing this requirement, especially in neighborhoods well-served by ample public-transit options, will go a long way toward encouraging the construction of many additional affordable housing options in our city.

» **Thank you for your comment. The comment is noted.**

I support Alternative 2. This alternative would encourage greater housing density without requiring a change to the single-family zoning that so many Seattle residents love. The out-dated rule requiring an additional parking space per ADU or DADU is a significant obstacle for many homeowners who wish to add housing stock to our city through the construction of a DADU. Alternative 2 would also encourage the construction of more housing stock in the rental market by removing the owner-occupancy requirements.

» **Thank you for your comment. The comment is noted.**

Alternative 2 would remove two key obstacles to the construction of more housing units in Seattle's restrictive single-family zoned neighborhoods. Removing the owner-occupancy requirement would encourage homeowners to make the long-term investments required to add permanent housing stock to the rental market. Under the current scheme, homeowners who build a DADU or ADU must take the radical step of gutting their additional housing units should they decide to rent out the main house. Making the changes under Alternative 2 would remove this onerous requirement and encourage owners to make the long-term investments in the rental market that our city needs. Removing the car-centric parking requirements under Alternative 2 removes another key obstacle to the construction of much-needed housing in our city, in which significant changes to single-family zoning is politically unpalatable.

» **Thank you for your comment. The comment is noted.**

## Wright, Eric

Among the risks to on-street parking availability, ADUs seem to have minimal impact according to your analysis - and also my personal experience. Also, I think it's likely that increasing density will lead more people to walk or use transit, at least in areas where those two forms of transportation are nurtured.

» **Thank you for your comment. The comment is noted.**

Reading through this EIS, I was impressed that the authors wrote about the history of zoning and red-lining in Seattle. I think it is really important to point out that reserving more than half of the residential

land in the city for single family homes is a relatively recent \*choice\* and that it is a choice that is rooted in exclusion, financial interest on the part of home owners, and, in some cases, racism.

This EIS goes beyond the debate about ADUs and hints at the greater question of 'who is this city really for?' I, myself, am a home owner (although in a multi-family structure) and I see the damage that housing supply restriction causes here and in other, similar cities. I was lucky to be able to buy in Seattle; I want more people to have that opportunity. Please, let's not become (more) like our Bay Area neighbors to the south, waving a flag of progressive inclusivity while simultaneously refusing to allow new neighbors who don't meet an increasingly out-of-reach wealth threshold.

Reversing exclusionary zoning in the city will not fix all of our equity and affordability issues by itself, but it is certainly a good start that opens up a lot of options for more targeted efforts. I support the city's vision for relaxed ADU rules and I hope we can go much further along the way to increasing density in single family zones.

» **Thank you for your comment. The comment is noted.**

I live in a neighborhood where ADUs are present, although not in large quantities. I find that they generally fit in with the existing structures quite well and I see no reason not to have more of them.

» **Thank you for your comment. The comment is noted.**

Regardless of the analysis here, I have no problem with increasing density in the city - especially in single family zones. ADUs should be a component of that, even if they have a fairly small effect on density. But much more important, in my view, is to allow more general types of multi-family housing in SF areas - houses on smaller lots, townhouses/rowhouses, even small apartment buildings. I know that the political obstacles to this are tremendous; I just want to voice my support for that sort of effort.

» **Thank you for your comment. The comment is noted.**

## Wyatt, Bonnie

The North Police Precinct is already over burdened. Low barrier tiny housing has added to crime and undesirable stigma on surrounding neighborhoods. The current city council decisions are trashing my neighborhood of 29 years.

» **Please see Section 4.5, Public Services and Utilities, for a discussion of police services.**

Again, I prefer alternative 2.

» **Thank you for your comment. The comment is noted.**

Alternative 2 looks best to me. As we get to larger lot sizes, the highest and best use is to add rental space rather than tear down for a higher priced SFR

» **Thank you for your comment. The comment is noted.**

I find the full build out scenario for Alt 2, drawing 4.3-25 to be more compatible with the aesthetics of Seattle SFR neighborhoods

» **Thank you for your comment. The comment is noted.**

I support alternative 2

» **Thank you for your comment. The comment is noted.**

Growth must be accommodated. Overall I prefer Alt 2. It is my understanding that the city of Vancouver BC put in utilities and lighting in alleyways in SFR, simplified permitting, and offered low interest loans to homeowners to build "cottage housing". I would love to build a DADU, but as a senior on fixed income, it is out of reach for me in Seattle.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Projection says utilization of existing parking is highest in Alt 2

- » **Thank you for your comment. The comment is noted.**

### Yakima Ave Group,

I support Alternative 2 and 3

- » **Thank you for your comment. The comment is noted.**

I think the neighborhoods can absorb these changes.

- » **Thank you for your comment. The comment is noted.**

Our families are smaller. Many single family homes have only 1-2 people in them. Adding the ADUs would be using more water/sewage, etc but probably no more that with families.

- » **Thank you for your comment. The comment is noted.**

### Yakima,

The basic nature of the neighborhood won't change with ADUs or backyard cottages. There will be more people living there which may impact the # of cars. But I think that single family homes/neighborhoods can incorporate that change without significant harm to the neighborhood.

- » **Thank you for your comment. The comment is noted.**

There may be more cars. But there may be more people to ride on the buses.

- » **Thank you for your comment. The comment is noted.**

### Zemke, Steve - Chair - Friends of Seattle's Urban Forest

As written alternatives 1, 2 and 3 provide a mixture of options and each should be evaluated separately. Alternatives 2 and 3 could also be 4 and 5 by adding the components differently. For example 2 and 3 could both include no off street parking which is preferable for saying space for vegetation and trees. This is not a reasonable way to look at the differences with only 2 options for alternatives,

- » **The final proposal can include any combination of the alternatives considered in the EIS. Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes aspects of Alternatives 2 and 3.**

It seems this proposal where owners do not have to occupy one of the units basically turns the property into rental housing and the units would now basically comprise the property becoming like a duplex or a

triplex from an economic sense in that landlords now would have up to 3 rental units per lot. It is a sneaky way to upzone the property by calling it another name. 1000 square units would have 2 bedrooms I think they would have more than 1.5 people occupy them and if a family could easily have several kids also. Using Portland figures is questionable to estimate how many people would be in a unit.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

Calculation of ADU's impact on tree canopy as only covering the footprint of the building does not take into account the fact that the footprint alone is not the potential total impact. All trees around the building footprint would have to be evaluated as to the building's impact on their root system, particularly the critical root zone. This is not discussed. In addition the impact on saving trees groves is not discussed. A grove comprising 8 or more trees 12 " in diameter is exceptional. Removing one or two trees would obviously make the tree grove no longer exceptional and it would lose it's protection. How many tree groves do you expect the ADU buildings to impact this way?

Also you make no mention of the mitigation requirement in the current ordinance to replace all exceptional trees and trees 24 " DBH removed during development. Why is this provision not being enforced and why is it being ignored? This is SMC 25.11.090.

Also your new current system of data entry does not tally tree size, species and

whether exceptional or not or over 24' DBH. Having them on site plans alone does not measure impact on the tree canopy. How hard is it to enter this data on your new system and why are you not doing it? SMC 25.11.090 would indicate that there is a need to track the trees being removed as well as what's being replaced and where. Again why are you not doing this? You need to implement a system of tree permits to track loss of trees 6 " DBH and larger in an updated tree ordinance. 24" trees are less than 15% of the trees on single family lots. 6" trees are about 46% according to Seattle's Forest Ecosystem Values report in 2012.

Why do you not mention the tree impact referenced in the Tree Regulations Research Report of March 31, 2017? It says the current ordinance is not working. Why do you not mention or propose any mitigation as being required as recommended in that report? The mention of updating the tree ordinance is not a certainty. The City Council proposed updating the ordinance in 2009 and it is now 9 years later. Urging mitigation for expected tree loss from this proposal would help to update the current ordinance.

How is this EIS adequately describing the impact of increased ADU development on tree loss when it is not urging mitigation but saying there is "no significant adverse impacts"? What is your definition of significant? Obviously this ordinance will result in tree loss and make it harder to reach city canopy goals. How many trees over 6 " DBH will be lost? How many exceptional trees will be removed? How many tree greater than 24" DBH will be removed? where will the replacement trees under 25.11.090 be planted? How much will the city charge for the replacement fees?

- » **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

## Anonymous 1

ABSOLUTELY Option #1: maintain current ordinance! FAMILIES want to keep Seattle Seattle and NOT become another NYC or Hong Kong. And we VOTE: pay attention Mr. Brian!

- » **Thank you for your comment. The comment is noted.**

## Anonymous 2

I think we have done enough to mess up our single family neighborhoods without making it easier for the developers.

» **Thank you for your comment. The comment is noted.**

## Anonymous 3

My name is Austin Gunsaulley. I live in District 6. I want more housing because it is abundantly clear that our current housing situation is inadequate for the city's burgeoning population, and because the financial situation is such that we need to take advantage of every opportunity we are presented with.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

#### Anonymous 4

Please remove the parking requirement. It increases housing cost and stock.

- » **Thank you for your comment. The comment is noted.**

#### Anonymous 5

Support the proposal outlined in Alternative 3 for Off Street Parking ("No off-street parking required for lots with one ADU. One off-street parking space is required for lots adding a second ADU."). This allows for both ample street parking for moderate/small build outs with only one ADU, but increases requirements for larger occupancy lots.

- » **Thank you for your comment. The comment is noted.**

Support Alternative 2 for Owner Occupancy ("No requirement for an owner to occupy the house, AADU, or DADU.").

- » **Thank you for your comment. The comment is noted.**

Support Alternative 2 in Maximum Gross Floor Area & Rear Yard Coverage for more effective lot coverage and usable space. In order to accommodate the community dynamic we are after in single-family dwelling areas, we must provide enough square footage for ADUs & DADUs to feel like single family homes. Without the flexibility for indoor space in Seattle's climate, we won't maintain that community dynamic.

- » **Thank you for your comment. The comment is noted.**

Support the proposal outlined Alternative 2 ("Lots in single-family zones can have an AADU and a DADU."). For single family dwellings with 1-4 occupants (the majority of single family lots in Seattle), land & utility use is minimal. We must support cluster living in the metropolis for better efficiency and maintenance of public lands outside of the city. Alternative 2 achieves reasonable density in single-family zones within the city limits.

- » **Thank you for your comment. The comment is noted.**

## Anonymous 6

I am absolutely in support of making it easier - and even incentivizing - the construction of more ADU's! I own a house in a single- family neighborhood in Ballard, but I am a young woman in my 20's who was fortunate to be able to purchase my house from my parents. I'm not as financially comfortable as many of my neighbors, and being able to supplement my income by constructing an additional unit on my (large) property would be an enormous help.

» **Thank you for your comment. The comment is noted.**

I don't care and don't think this should be a factor that prevents our city from becoming more dense. Again, I am a Ballard homeowner

» **Thank you for your comment. The comment is noted.**

I definitely feel that I would be benefited by more housing in my neighborhood. I am young and employed in the public sector, as are most of my friends. If I had not been fortunate to purchase my home from my parents, there is no way I would have been able to afford a home in Ballard. None of my friends will be able to afford a home in the city, or at least not anywhere near me. I don't understand why it's supposed to be better for me to have neighbors who can afford to buy a \$1.5 million property (as the house next door just sold for) than to have three or four homes on that same lot, which could be occupied by people who are more similar to me in age and income.

» **Thank you for your comment. The comment is noted.**

I am a Ballard homeowner and I am absolutely, 100% in favor of changing the single family zoning to create more multi family housing in all parts of the city, including mine! I think it's selfish and discriminatory not to do so.

» **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code changes and are outside the scope of the EIS.**

PLEASE make it easier to build ADU's! In other cities they have incentivized homeowners to build ADU's and rent them out at market rate. If I could get some help - or at least get a reduction in hassle - to build an ADU in my (sizable and unused) backyard, I absolutely would!

» **Thank you for your comment. The comment is noted.**

People do not have an inherent right to store their private property (i.e. Park their car) on public land. Many people have garages or driveways that they do not use, and then complain about not being able to find a spot on the street. Not a right! Let's invest in our public transit system, prioritize affordable housing near transit hubs, and get more people to adopt a car-free lifestyle.

» **Thank you for your comment. The comment is noted.**

## Anonymous 7

One thing that came to mind after learning that the total number of people in all structures on a single family housing lot equal ONE HOUSEHOLD: let's say that 2 people rent a DADU in Queen Anne; it's affordable enough for them (one of them works full-time, one works part-time). In their previous apartment they signed up for the Utility Discount Program to help reduce overall expenses. But, now that they are in a DADU, they must include ALL PERSONS (and their accompanying incomes) living on the lot (ie, they must include those living in the main house plus possible AADU) as members of their household when applying for UDP - and now, most likely they will not qualify. This has the potential to

reduce the number of folks who can take advantage of the UDP - and I know that SCL is trying to increase the number of people who sign up for it!

» **Thank you for your comment. The comment is noted.**

Generally speaking, more transit service is desperately needed. You can't reduce parking requirements (which is a good incentive to get people out of their car) without first having excellent transit in place.

» **Thank you for your comment. The comment is noted.**

## Anonymous 8

I support flexibility in designing ADUs, no owner occupancy restrictions, and no parking requirements. We need the biggest variety of housing we can get.

» **Thank you for your comment. The comment is noted.**

Density is a GOOD thing. It brings economic development to my neighborhood in the form of more healthy businesses. It allows for more folks to capitalize on the wonderful opportunities afforded by our city, currently large exclusively capitalized upon by the wealthiest who can afford single family homes. I don't care at all about how many people live in a house, be it 1 or 10. Just get this legislation passed and legalize housing!

» **Thank you for your comment. The comment is noted.**

We need to stop giving credence to parking concerns as an environmental issue. Nobody owns street parking for gods sake and I am sick and tired of entitled drivers whining about the loss of their formerly exclusive capitalization of the public ROW! That said I think it mildly concerning that we're building units potentially far from public transportation though, though really I'm sure it'll be fine for the most part. If there are concerns about buses being more full, I think that's a GOOD thing. For example I live in Ravenna, and I'm very concerned that my 71 bus will get cut because there simply aren't enough riders. Adding more folks, esp. lower income folks who are more likely transit users and are more inclined to ride the bus, increases the chances my route stays alive.

» **Thank you for your comment. The comment is noted.**

I think aesthetics should be totally disregarded as an impact, since for the most part, few people will ever even see the units in question.

» **Thank you for your comment. The comment is noted.**

I have no concerns with respect to this.

» **Thank you for your comment. The comment is noted.**

I'm currently really conflicted on the issue of whether or not I support ADUs. On one hand, I am concerned that ADUs will make it harder to densify SFH regions in the future and add more housing (which I consider to be a public good). They will add improvements to the land, which will make it more expensive to purchase for redevelopment. Furthermore, more people will be living on this land, specifically lower income folks, whose eviction will pose a political challenge to redevelopment, an argument I'm certain will be employed by anti-housing people, some of whom might even be opposing this very piece of legislation. On the other, we are currently in a housing crisis, and every drop of supply helps with the abatement of these surging rents, and these units might allow for folks to age in place which is something I strongly support.

» **Thank you for your comment. The comment is noted.**

I want these units to ensure these units are built as cheaply built as possible, so in the future when it comes time to further densify our city, they will be ready to be torn down. Furthermore, lower the cost of construction (including regulatory costs) the cheaper it is to build this kind of housing, ensuring that these savings can be passed onto lower income folks. I want these units built, just be sure that it's possible (both politically and economically) to replace them with midrises or something in the future

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

I support more housing. I am however concerned about the long term ramifications of this legislation.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 9

Please expand to include ADU addition for Duplexes with adequate lot size.

- » **The study area for the EIS includes land zoned single-family outside of existing urban villages and urban village expansion areas studied in the Mandatory Housing Affordability EIS. Please see Exhibit 2-1 in Chapter 2, Alternatives, for a map of the study area.**

I am in support of Alternative #3.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 10

Please choose Alternative 2! Dormers and green roofs are wonderful, I would love to see more of them in my neighborhood and for our cottages to be as pretty and green as our city deserves.

- » **Thank you for your comment. The comment is noted.**

This underscores the need to go with Alternative 2. Raising maximum household size and allowing multiple ADUs will be best for equity and affordability.

- » **Thank you for your comment. The comment is noted.**

I support Alternative 2. Minimizing parking and lot coverage requirements makes sense. We are becoming a real city. The house I own will soon be walking distance from Link Light Rail.

- » **Thank you for your comment. The comment is noted.**

A majority of Seattle is very restrictive and exclusive single-family zoning with very large lot sizes. We have lots of space to add ADUs while remaining compatible with a residential development pattern. I have no concerns with Alternative 2 in this regard, and it has the most benefits in other areas such as affordability.

- » **Thank you for your comment. The comment is noted.**

Please choose Alternative 2! It will have the largest impact the fastest. Seattle's housing crisis can't wait.

- » **Thank you for your comment. The comment is noted.**

Please don't let process delay these changes any longer. People in Seattle are desperate for more housing. We can't wait.

» **Thank you for your comment. The comment is noted.**

Please encourage the building of ADUs by reducing utility hook-up fees and paperwork. Our housing crisis can't wait.

» **Capacity charges are levied by King County; the City does not have authority to waive those fees. King County has two studies underway that may lead to changes to the capacity charge, including charges for a new ADU. See [kingcounty.gov/services/environment/wastewater/capacity-charge/review-studies.aspx](http://kingcounty.gov/services/environment/wastewater/capacity-charge/review-studies.aspx) for more information. Please also see the frequent comment response regarding King County Sewage Treatment Capacity Charges.**

### Anonymous 11

It's a bad idea to destroy the special quality of our single family neighborhoods and this will achieve such a negative result. Parking will worsen. Already overburdened amenities will be further overcrowded. Noise and privacy will be lessened. Many of these will be rented out via Airbnb, etc. causing a revolving cast of strangers on what were close knit blocks.

This stinks of an urbanist "camel's nose under the tent" measure to further erode the amount of quality within Seattle single family neighborhoods. I'm vehemently opposed.

Existing zoning can accommodate all of the projected population growth expected in the next decades. Why wreck such a wonderful element of the city with this misguided idea?

» **Thank you for your comment. The comment is noted.**

### Anonymous 12

ADUs have great potential to be a net good for Seattle! I love living here, and I love the number of new people coming into the region. I encourage the City to adopt Alternative 2 or 3 and increase density, so that those of us who are already here are able to stay, and those of us who want to come here are able to do so.

» **Thank you for your comment. The comment is noted.**

I was particularly pleased to see that Alternatives 2 and 3 result in fewer teardowns and help maintain the aesthetic character of neighborhoods. I currently live in a condo in Wallingford and love the character of the houses in the Wallingford/Fremont area. Solutions that can increase density while reducing teardowns are wonderful!

» **Thank you for your comment. The comment is noted.**

As a renter in Seattle, a solution that decreases housing prices even marginally is something I'm in favor of. Both Alternative 2 and Alternative 3 would increase my options for housing by providing more types of housing, and by increasing the housing supply and helping to flatten out housing prices.

» **Thank you for your comment. The comment is noted.**

## Anonymous 13

We need to have more housing and aadu/dadu are key to making that work. Please don't make it too dependent on parking.

» **Thank you for your comment. The comment is noted.**

Alternative 3

» **Thank you for your comment. The comment is noted.**

## Anonymous 14

Thank you for your hard work on the ADU EIS and the opportunity to provide comment.

I am writing in support of Alternative 2, and would like to provide some additional suggestions. My comments are as follows:

1. Roughly 1/5 (25,000) of the houses in the SFR zone are rentals. Please don't preclude those owners from adding housing units in high opportunity neighborhoods!

As the EIS made clear, eliminating the owner occupancy will NOT result in a rush on single family homes by developers. The economics will continue to result in tear downs being replaced by large single family homes, and this trend is even more likely to continue if ADUs and DADUs are not allowed on rental properties! By prohibiting landlords from adding ADUs or DADUs on their properties, Seattle is effectively legislating unsustainable development in the form of teardowns and the subsequent construction of McMansions.

Providing access to high opportunity neighborhoods for low income people will result by adding more rental units in the SFR zone, not by eliminating competition from developers and lowering costs for buyers. Lower income families can no more afford to buy a home for \$600,000 than \$1.5 million. But they may be able to afford to rent a small DADU if those options are made more available. It is also quite likely that landlords will be more inclined than homeowners to add an ADU or DADU. Why prohibit that?

2. The suggestion in Alternative 3 to allow 2 ADUs is a good one. Include that in Alternative 2 as well.

3. The Alternative 3 suggestion to implement an FAR limit is a good one to the extent that it might decrease the number of teardowns and the subsequent construction of McMansions. However, I would suggest that a size allowance be added if an ADU is included in the structure, whether it is below grade or not. The 2500 sq ft limit on lots 5000 sq ft and smaller does not allow much room for an ADU, much less two ADUs as proposed in Alternative 3. I suggest increasing the house size to 3000 sq ft if an ADU is included. The city's goal is to encourage the construction of ADUs, not just limit the construction of McMansions. With this stipulation, I would include the FAR limit in Alternative 2 as well.

To take the FAR idea a step further, consider allowing larger DADUs on oversized lots. There are a lot of lots in the SFR 5000 zone that are significantly larger than 5000 sq ft and could easily accommodate a larger DADU. The FAR concept would be a better limit in these cases than the proposed 1000 sq ft limit. A 1000 sq ft DADU on a 5000 sq ft lot would be a FAR of .2. How about establishing the greater of 1000 sq ft or .2 FAR as the limit? If there is a desire to limit the size of the main house, impose a combined FAR of .5. That way, someone could build two 1500 sq ft houses on a 6000 sq ft lot, which would be far preferable to one 3000 sq ft McMansion.

4. The suggestion in Alt 3 to apply MHA requirements for a second ADU or DADU is a terrible idea. ADUs and especially DADUs have a high cost per square foot given their small size. Construction cost

is often cited as one of the main reasons that more are not being built. If the city's goal is to encourage more ADUs, why would you want to impose this barrier? I understand the need for more affordable housing, and I am in favor of MHA requirements on large multi-family projects, but small landlords and homeowners can't afford this additional cost.

A few additional thoughts that I don't believe were discussed in the EIS:

5. Consider allowing an ADU or DADU to be added to pre-existing duplexes in the SFR zone. Current regulations prevent owners of these structures from adding more than 500 sq ft of living space, much less adding an ADU or DADU. Get rid of this outdated regulation.

6. Consider allowing 2nd story decks to be added to DADUs. Existing rules prohibit decks over a certain height in backyards and thus prevent adding a deck when a DADU is constructed over a garage. Outdoor living space is critical to healthy living. If the concern is that the DADU resident will be staring down into the neighbor's backyard, consider requiring that the deck not be adjacent to a property line (unless there is an alley).

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

## Anonymous 15

Dear members of the Seattle City Council--

My name is Brice Maryman. I live in the Central District in a single-family home that was originally built as affordable housing after WSDOT sold the land--originally part of the I-90 construction staging--in the early 1990s. This home is no-longer affordable and, if I wanted to build an ADU, my reading of the rules shows that it would be illegal.

While I have no illusion that removing unnecessary restrictions to ADUs and DADU development will solve our housing crisis, I also know that liberalizing the rules relating to this development type is a strong, necessary step. We need to open up neighborhoods to more households and more types of residents. We can't use our land use code to build walls of unaffordability. We need more housing in the city, more transit-oriented housing regionwide - to address our housing and climate crises.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12 - we could easily support a cooperative of 3-family sized households on a typical 5000 sf lot - and this would allow more low-income and non-market housing in single family zones. The city looked at doing this in the late 70s, but ultimately relented to anti-housing homeowners.
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.
10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.
11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Thank you for your consideration for these changes, and for continuing to make it easier for a variety of people

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Anonymous 16

The Owner Occupancy Requirement should not change from what it currently is. This requirement is necessary to ensure houses are not redeveloped by businesses. The current requirement means the owner has skin in the game. There is absolutely pride in ownership verses an all rental property.

- » **Thank you for your comment. The comment is noted.**

## Anonymous 17

It is absurd to claim in the EIS that allowing construction of three multi-story units on smaller lots will not destroy the aesthetics of SF neighborhoods. Over time, a decreasing number of SF houses will be surrounded by incompatible clusters of three poorly designed multi-occupant rentals. Since developers won't have to reside on their property, they will have no incentive to preserve the character of SF neighborhoods.

- » **As noted throughout the Final EIS, localized impacts from clustering of new ADUs could occur.**

Allowing three multi-occupant units per lot, and decreasing lot size, is grossly incompatible with existing development in SF zones. It will rapidly eliminate SF neighborhoods, other than hold-outs who will become islands surrounded by multi-story, multi-occupant rentals. If the true goal is to eliminate SF zones, be honest enough to state this and make the case to the public for such a large change in demography.

- » **Thank you for your comment. The comment is noted.**

The city has not presented any data to support O'Brien's claim that his proposal will increase affordable rental housing. Developers will build to market rate and accessory units in currently desirable residential areas will rent at the higher end of the scale, not for those seeking affordable units.

- » **The objective of the project is to remove regulatory barriers to make it easier for property owners to permit and build ADUs and increase the number and variety of housing choices in single-family zones. As outlined in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would result in a slight reduction in the upward pressure on rents and housing prices.**

The city has not made a convincing case that existing code imposes a barrier to demand by property owners for adding ADUs and backyard cottages. The proposed code change will lead to the elimination of single family housing in much of the city. Instead of opening the flood gate to irreversible loss of SF neighborhoods through rapid development, the city should take an incremental approach. Instead of allowing property owners to build both ADUs and DADUs on their lots, the city should make small changes to existing code to remove perceived barriers to construction of ONE ADU OR DADU per lot, but not both. Wait five years to see whether there is a substantial increase in owner construction of one accessory unit, and whether this provides some relief to demand for affordable housing. To preserve the intended character and purpose of the existing accessory unit code, MAINTAIN the current requirement that the owner must reside on the property in order to be granted a permit. Also maintain existing code for the number of unrelated occupants per accessory structure to help preserve character of residential neighborhoods.

These are all good faith steps that council should take to convince property owners that the intent of this proposal is truly to facilitate the ability of owners to remain on their property by constructing a rental unit, as has been stated repeatedly by O'Brien. His proposal for large changes in the code to allow rapid construction of three multi-occupant units per lot is widely viewed as a thinly veiled way of circumventing the city's master plan and allowing single family houses to be replaced by dense development outside the bounds of the urban villages. The removal of the owner residence requirement can only be interpreted as a means of allowing developers to tear down existing SF houses and replace them with three multi-occupant structures without having to live with the consequences of these changes to neighborhood character.

- » **As outlined in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would result in the creation of 2,310 additional ADUs under Alternative 2, 1,430 additional ADUs under Alternative 3, and 2,460 additional ADUs under the Preferred Alternative, compared to**

**Alternative 1 (No Action). While construction cost certainly impedes construction of additional ADUs, the analysis in this EIS shows that existing regulations also act as a barrier.**

The EIS completely fails to discuss impacts of the proposed Land Use changes on how increases in stormwater runoff will be mitigated. If these changes are adopted, whole residential neighborhoods could be rapidly converted to three multi-occupant units per lot. These changes would increase ground coverage dramatically, leading to much greater levels of water runoff from new structures. The city and county's wastewater treatment infrastructure is wholly inadequate to handle existing levels of runoff. For the EIS to be credible, it must address this critical issue of how large potential increases in wastewater runoff will be mitigated. Council should not adopt the proposed code change without a detailed and feasible plan for large scale mitigation of wastewater runoff.

- » **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

The EIS ignores the expert witness testimony in the examiner's hearing about the parking impact of allowing the construction of three multi-occupant units per lot in residential neighborhoods. On-street parking is already tightly limited in many neighborhoods, and allowing a large increase in the number of occupants per lot, while removing the current requirement for off-street parking, will explode the parking problem in neighborhoods. It is demagogic to suggest that many of the new occupants in residential neighborhoods will rely on public transport. These areas are often remote from transit and inadequately served. The nearest bus stop may be far from interior streets in residential areas and residents will inevitably rely on cars as most do now in these areas. The few buses that serve residential neighborhoods are chronically over-crowded and behind schedule. A massive increase in population density in these neighborhoods, without a scaled increase in transit service, and re-routing to provide closer stops, will result in even greater traffic congestion getting in and out of these areas than currently exists.

- » **Please see the frequent comment response concerning impacts to parking.**

As discussed below, existing stormwater runoff treatment infrastructure is grossly inadequate to meet current levels of waste water. Allowing a large increase in population density in residential neighborhoods, without a comparable upgrading of wastewater utilities, will increase flooding and pollution due to large increases in demand and ground coverage.

Sewage lines in these neighborhoods are antiquated and barely able to cope with existing demand. Massively increasing population density without scaled upgrading and increases in sewage lines will result in increased failures and pollution.

Road maintenance in residential areas cannot keep up with current levels of use and local roads suffer from long-term potholes, cracked surfaces, and disintegrating curbs. The large increase in local traffic that will follow the proposed large increase in density in these neighborhoods will worsen road condition.

- » **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

### **Anonymous 18**

I think this is one of the most efficient options to increase housing options with minimal aesthetic impact.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 seems to best serve the greatest number of seattle residents

» **Thank you for your comment. The comment is noted.**

I appreciate that this puts more creative options for homeowners to afford in this expensive market while also leveling the rental prices and supply

» **Thank you for your comment. The comment is noted.**

I think this is a great way to allow the city to grow along with the increase to multi fam and still giving people an economical option in a smaller more private setting.

» **Thank you for your comment. The comment is noted.**

I don't agree with the forecast. This can only cause increased parking issues in an already constructed parking situation especially with the decrease in parking spaces from bike lanes and lack of parking and economical parking planned near new light rail stops

» **Please see the frequent comment response concerning impacts to parking.**

Increasing alternative energy incentives in general and with A/DADUs could be helpful.

» **Thank you for your comment. The comment is noted.**

## Anonymous 19

Please support option 2. Adus are a way to increase housing in the city and do so across the board, not only in neighborhoods without entrenched opposition to new development.

» **Thank you for your comment. The comment is noted.**

The lack of impact on displacement make this a clear step forward to increase housing and hold down skyrocketing cost of living without adversely impacting low income and people of color. It is a clear win and alternative 2 should be supported.

» **Thank you for your comment. The comment is noted.**

The fact that adu liberalization such as in alternative 2 would slow home demolition shows that more adus are needed to help neighborhoods retain their character while adding much needed units.

» **Thank you for your comment. The comment is noted.**

Please support alternative 2

» **Thank you for your comment. The comment is noted.**

## Anonymous 20

I support Alternative 2.

» **Thank you for your comment. The comment is noted.**

## Anonymous 21

I am glad to see these proposals and strongly advocate for more housing options and making the process of adding dwellings to a property a less onerous process. I think option 3 is the best middle ground but would like to see the same permitting benefits offered for option 2 applied here. The streamlining of permitting on option 2 feels like steering on the part of the city and I do not like that. Design review should play a vital role in helping create appealing and useful built environments as this moves forward.

» **Thank you for your comment. The comment is noted.**

I favor option 3 ultimately but like streamlined permitting in option 2. I would like to see the same streamlining for option 3.

» **Thank you for your comment. The comment is noted.**

I think adding one parking space when two ADU's are built is responsible and will help make the housing approachable to more people, many of whom need a car for their work or life, and would mitigate the sense of claustrophobia that could easily create a more hostile feeling environment. Our public transit infrastructure and timing is woefully under developed to get as many people out of cars as the city seems to want to.

» **Thank you for your comment. The comment is noted.**

I think option 3 offers the most pragmatic balance of increasing density and scaling up services. I would like to see more of our power lines buried during this growth to create a more robust and aesthetically pleasing power grid,

» **Thank you for your comment. The comment is noted.**

I know that I, and I believe many citizens, would embrace the opportunity to offer an affordable rent and stable home for a fellow citizen. We as a community can improve the life situation for many and do so literally in our own back yards.

» **Thank you for your comment. The comment is noted.**

I think balancing scale is important and allowing AADU/DADU size to be big enough to fit the needs of a broader group of people without being crowded or overwhelming.

» **Thank you for your comment. The comment is noted.**

I think with proper design we can increase density across the city and in the process create stronger and more inclusive communities.

» **Thank you for your comment. The comment is noted.**

## Anonymous 22

First, the proposal seems well defined and reasonable to me. Well thought out.

Second, costs and time required associated with permitting and inspection is constricting and discouraging. While expediting and lowering costs is addressed, it is not in detail. Final results in this regard will be very important to encouraging these units to actually be built, and increasing the housing

stock in Seattle, the actual aim of this proposal. Permitting, inspection costs and time requirements must be significantly reduced.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

As a homeowner and retiree with no background or experience in planning or building, but an interest in adding a dadu, the economics need to look encouraging. Costs associated with permitting, inspections, code compliance, construction and afterwards the increase in tax liability will all contribute to the decision to build or not. There needs to be a determined effort to cut these expenses for this proposal to be effective.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

### Anonymous 23

There should be no owner occupancy requirement for ADUs.

- » **Thank you for your comment. The comment is noted.**

There should be no off-street parking requirements for ADUs. On that measure, alternative 2 is best.

- » **Thank you for your comment. The comment is noted.**

Alternative 1 is non option.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 24

We are property owners in Montlake and like alternative #3. We currently have an ADU and would like to "downsize" ourselves by adding an additional ADU. If we can't do this, we will move out of the area. We have lived here for over 20 years and love the location and our neighbors. We have had great success with our ADU and have fantastic renters. The house is too big for us and we would like to grow old in place. This would help us maintain our house here and help out with affordable housing for Seattle.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 25

It appears the proposed revisions to existing Land Use codes are in conflict with the goals to improve living conditions here in Seattle. Making revisions to existing Land Use Codes to force changes in our citizen's lifestyles to conform to some master plan of life in Seattle is completely out of the realm of building a more vibrant city..

- » **Thank you for your comment. The comment is noted.**

The visual scenarios presented herein are not realistic, much the same as the expected outcome of suggested revisions to the Land Use Codes her in Seattle.

» **Thank you for your comment. The comment is noted.**

Given the values in the tables included, revisions to the Land Use Codes do not truthfully reflect the nature of transportation/parking in Seattle. The public transportation system in this city is horrendous, yet is still being proposed as a measure of travel in and around Seattle. Do not regulate properties by assuming other cities' methods will work in Seattle (i.e. Portland).

» **Please see the frequent comment response concerning impacts to parking.**

The barrier's to be removed while claimed to be in the interest of property owners, apply mainly to costs associated with developers and contractors. Has there been a study about how many land developers actually reside in Seattle?

» **Please see Section 4.1, Housing and Socioeconomics, for a discussion how the proposal might change the underlying real-estate economics in single-family zones and if it makes properties more attractive as rental investments rather than as owner-occupied assets.**

The statistics used for the Socioeconomics relating to this proposal are conflicting and completely opposite what I see in my neighborhood. People cannot afford to rent living spaces, let alone the units up for rent are higher in order for landlords to remain profitable.

» **Thank you for your comment. The comment is noted.**

Once again, the impacts listed in this report are in conflict with the experience in real life. Every month we get newsletters agonizing over the increased burden on our public utilities and the increased costs thereof. Condensing the population by using ADU's, as defined by the numbers presented in this report, can only increase the cost of our Public Services hence pushing the cost of living in Seattle ever higher.

» **Thank you for your comment. The comment is noted.**

## Anonymous 26

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allowed by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Anonymous 27

The current owner occupancy requirement is too burdensome because there are times and circumstances where it simply is not feasible.

- » **Thank you for your comment. The comment is noted.**

My house is close to bus lines and retail outlets, so I do not think it needs extra parking spaces.

- » **Thank you for your comment. The comment is noted.**

I strongly support alternative 2.

- » **Thank you for your comment. The comment is noted.**

## Anonymous 28

I support Alternatives 2 and 3. Increasing density is desperately needed in the city, but allowing specifically more ADUs will allow the city to maintain its neighborhood charm while adding much needed housing.

» **Thank you for your comment. The comment is noted.**

With the analysis from this chapter in mind, I still strongly support alternatives 2 and 3 to better maintain aesthetics of neighborhoods while allowing growth

» **Thank you for your comment. The comment is noted.**

With the analysis from this chapter in mind, I still strongly support alternatives 2 and 3.

» **Thank you for your comment. The comment is noted.**

With the analysis from this chapter in mind, I still strongly support alternatives 2 and 3, although greater for alternative 2

» **Thank you for your comment. The comment is noted.**

With the analysis from this chapter in mind, I still strongly support alternatives 2 and 3, although greater for alternative 2

» **Thank you for your comment. The comment is noted.**

With the analysis from this chapter in mind, I still strongly support alternatives 2 and 3.

» **Thank you for your comment. The comment is noted.**

## Anonymous 29

Less regulations and more housing please.

» **Thank you for your comment. The comment is noted.**

I like alternative 2

» **Thank you for your comment. The comment is noted.**

more housing = lower rents

» **Thank you for your comment. The comment is noted.**

I live in district 1. I support alternative 2.

Please eliminate the parking requirement.

» **Thank you for your comment. The comment is noted.**

## Anonymous 30

As a homeowner I strongly support easing construction of ADUs

» **Thank you for your comment. The comment is noted.**

I think pricing people out of their homes is far more aesthetically concerning than more home options

» **Thank you for your comment. The comment is noted.**

I would like to see zoning changes to allow more housing to address the rising costs associated with a successful city

» **Thank you for your comment. The comment is noted.**

Increased density allows for better access to services like busses, it is environmentally responsible

» **Thank you for your comment. The comment is noted.**

The environmental impact of forcing people out of their homes by not having housing for a growing city is damaging in the increase in commuter traffic and the increase in homelessness. ADUs are a small step in the right direction that is coming far later than it should.

» **Thank you for your comment. The comment is noted.**

If we build to require parking, we force a car per person; we've already exceeded the population that idea can support.

» **Thank you for your comment. The comment is noted.**

### Anonymous 31

I am interested in changes that improve the aesthetics of housing opportunities within our neighborhood where housing demand is very high because of the proximity to downtown and university employment. Parking and transportation are very important as are access to public services and utilities. Alternative 2 offers realistic gross floor area for DADU. In most cases a height limit 1 to 3 feet higher than existing limits makes sense. Owner occupied housing will assure accountability to neighbors. An off street parking requirement is a good way to encourage effective use of public transportation which is quite accessible in our neighborhood. This neighborhood has excellent tree coverage and I am in favor of continuing this policy.

» **Thank you for your comment. The comment is noted.**

### Anonymous 32

I much prefer Alternative 2 due to the lifting of the requirement that homeowners live in the home for 6 months of the year. This is the only barrier keeping me from building a DADU on my property in Greenlake.

» **Thank you for your comment. The comment is noted.**

### Anonymous 33

It is hard to imagine that the models used for illustration can have led to the conclusion that there is no significant impact on aesthetics.

» **The Full Build-Out scenario was included only in the aesthetics analysis to illustrate a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it here to illustrate the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.**

In trying to tackle serious problems in a hurry you risk many unintended consequences that could be avoided with more careful study. People who want to and can afford to build ADUs or DADUs can and do construct them now, at increasing rates. It is not at all evident that this is the solution to the affordability problem. However increased density makes sense where it makes sense. Alternatives 2 and 3 do not take that into consideration with their one-size-fits-all recommendations.

» **Please see the frequent comment response regarding individual neighborhood review.**

The fallacy in the options is that the proposals do not take into account the differences in neighborhoods in the city of Seattle and their ability to accommodate the proposed changes in policy and regulation. Seattle is not a one-size-fits-all city, based largely on geography. Current regulations allow the flexibility to increase density where it can be accommodated.

» **Please see the frequent comment response regarding individual neighborhood review.**

As noted above, it is incomprehensible that the study concludes there is no need for mitigation in the area of land use. By using study locations that exclude neighborhoods close in to the city and suggesting that solutions that may have marginal impact to those locations also have marginal impact to the very different neighborhoods not studied defies logic. And there are certainly public safety and security issues that received no attention at all.

» **Please see the frequent comment response regarding individual neighborhood review.**

It is incomprehensible that the study concludes there are only marginal impacts and no need for mitigation in any area. In the area of housing affordability and displacement, the cost of building ADUs is such that they would not be affordable to lower income residents since homeowners would have to recoup their costs. If a house sold, it is most likely a developer would purchase the property and profit from resale of multiple units, thus reducing the availability of what affordable housing exists. ADUs are being built at an increasing rate by those who can afford to do so, but half of those are used as short-term rentals for visitors or tourists, not for Seattle residents.

» **Thank you for your comment. The comment is noted.**

This is an extreme example of not taking into consideration varying impacts of the proposals by using study locations that do not represent all neighborhoods. I can barely drive through North Queen Anne because of the narrow, winding streets with cars parked all along both sides of the roads. I actually bought a smaller car when we moved here so I could navigate the streets. To state there is marginal impact to adding more cars to the streets in these neighborhoods removes any semblance of objectivity from the report.

» **Please see the frequent comment response concerning impacts to parking.**

This is clearly an area where impacts vary by neighborhood. Sewer pipes in older neighborhoods are going on 100 years old. We just had to replace ours, and yards up and down the streets show signs we are not alone. You must consider all the neighborhoods when making a proposal - not four areas unrepresentative of all.

» **Thank you for your comment. The comment is noted.**

## Anonymous 34

I just strongly believe that whatever you decide to do it should be city wide, not just certain zones. If you are going to allow these the option should be available to all homeowners, not just sum. In a city as

expensive to live in as Seattle this is as much an economic issue (supplemental income for people) as it is a housing one. If the option is going to be available it should be available to all.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 35

Aesthetics should be considered so that ADUs don't change the aesthetic character of a neighborhood.

- » **Please see Section 4.3 for a discussion of aesthetics.**

Many Seattle neighborhoods are already suffering from lack of parking and congested streets. ADUs will exacerbate this problem. Please don't ignore this! Neighborhoods are too crammed as it is, and new occupants are not car-free as is sometimes hoped/suggested.

- » **The parking analysis presented in Section 4.4 analyzed potential impacts that could result from reducing or eliminating off-street parking requirements.**

### Anonymous 36

Please allow more homeowner and infill development through DADUs. I'm trying to get my backyard cottage planned and the county/city won't let me connect to my existing sewer stack, wants to charge me a 12K connection fee, parking is required, etc.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 37

I strongly support alternative 2. Alternative 3 is too restrictive for ADU owners and causes reduced housing stock and flexibility.

- » **Thank you for your comment. The comment is noted.**

Parking should not be required.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 38

There needs to be a requirement for ALL new development including ADU, DADU to provide off street parking for the residents. As a tax payer I shouldn't have to subsidize any developer or home owner who is renting out their property by providing the on street parking. Every home should have a minimum of one space for every unit on their property.

- » **Thank you for your comment. The comment is noted.**

Off Street Parking Requirements - There should be a parking requirement for ALL alternatives - as in Alternative 1 - if we are adding density to our neighborhoods then the property owners need to be responsible for providing parking on their property and not leave it to the tax payers to be responsible for street parking. Our roads are so busy now with cars parked on both sides and only place for one single car to drive down the middle - it is dangerous to drive and to be a pedestrian.

Owner occupied - There should be a requirement than an owner occupy either the main dwelling or the ADU or DADU - as in Alternative 1 or 3. We cannot allow developers or absent landlords to buy up the homes and turn them into multi-unit housing and not be present living in the neighborhoods. Please protect what makes our neighborhoods great by ensuring that owners occupy their homes or ADUs.

Number of ADUs - I support either Alternative 2 - I think it is fine to increase the number of living units in the neighborhood as long as the there is off street parking provided and the owner occupies the property.

Entry, Lot coverage, Max Height - etc - I support any of the alternatives and think these are fine things to change for more density.

» **Thank you for your comment. The comment is noted.**

I am supportive of increasing density if done in a smart way - I don't think changing all Single Family housing into multi-family is the smart way but do think that with proper planning, owner occupancy requirements and off street parking requirements that adus could be added into all neighborhoods. Let's grow without taking away the livability in our Seattle neighborhoods.

» **Thank you for your comment. The comment is noted.**

### Anonymous 39

We are concerned about the light pollution and light trespass. However, we are 100% in support of density/affordable housing and DADUs. Just please require all lighting of 2700K color temperature/ lower lumens/full shield/full cut off fixtures/and pointed down/mounted on first story preferred to stop light trespass.

» **Existing regulations applicable in single-family zones requires that all exterior lighting is shielded and directed away from adjacent residentially zoned lots. In addition, the Director of the Seattle Department of Construction and Inspections may require that the intensity of illumination be limited and that the location of the lighting be changed.**

### Anonymous 40

Adding ADU / Dadu helps the supply side of housing

» **Thank you for your comment. The comment is noted.**

Building & population residential area densities would still be low

» **Thank you for your comment. The comment is noted.**

Not any different than building more apartments

» **Thank you for your comment. The comment is noted.**

Demand on limited neighborhood parking would unavoidably increase

» **Thank you for your comment. The comment is noted.**

Waiving the Owner occupancy requirement gives flexibility for those who have to move but want to keep their property - not forced to sell

» **Thank you for your comment. The comment is noted.**

I support Alternative 2

- » **Thank you for your comment. The comment is noted.**

The scale mitigation and setbacks are adequate

- » **Thank you for your comment. The comment is noted.**

### Anonymous 41

This impressive research confirms common sense: exclusionary single family only zoning is bad for the environment, affordability, and diversity. I hope something like Alt.2 is adopted--reducing pre-development costs is important and will place ADU/DADU development in the reach of more homeowners, and removing the owner occupancy requirement is important as well.

Home ownership has become the primary way the middle class to accumulate wealth, but it comes with a catch--it's difficult to access that wealth if you want to continue living in your home. This is good for homeowners who want to downsize, and renters looking for more options. The changes to facilitate ADU/DADU growth should be implemented as quickly as possible.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 42

Our city is in a housing crisis. Outside of rezoning our single-family zones to allow more housing options, this remains the easiest choice to add housing to 3/4's of the City. After reviewing the draft EIS I fully support Alternative 2 as the best option for the future of Seattle.

- » **Thank you for your comment. The comment is noted.**

Please consider alternative 2 as the way to address our housing affordability and shortage.

- » **Thank you for your comment. The comment is noted.**

Under alternative 2 there is less risk of displacement in high displacement areas, while not causing significant increases in land value. It has the added benefit to allow current landowners an additional income stream to help alleviate the high cost of living. Further, alternative 2 has the greatest potential to add much needed housing throughout the city, not just in urban villages.

- » **Thank you for your comment. The comment is noted.**

Under the current system, the majority of the population growth the City has experienced has been in located within Urban Villages or along traffic choked arterial's. It has been widely reported most SFR zones have actually lost population since the 1970's. This has largely been a result of household size declining. Adding density to single-family zones gives residents more living options and places them near other amenities, such as parks, while spreading the population growth over the entire City.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 43

I'm in favor of alternative 3 for maximum flexibility -- in our current housing crisis we need as much higher density housing as possible. Alternative 2 is fine, however.

- » **Thank you for your comment. The comment is noted.**

## Anonymous 44

My name is Bryant Durrell. My household is made up of myself and my wife.

I live in District 6. I want more housing because rental and purchase prices are too high in Seattle; lower cost of living keeps our city diverse and vibrant and directly helps the homeless problem.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.
10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit

reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

### Anonymous 45

I believe that the most permissive program for ADUs is best. In that light, Alternative 2 with some modifications would be best. I prefer the Sightline Institute's approach.

"For the final preferred alternative, we support Alternative 2 as proposed, with the following modifications:

1. allowance for two attached ADUs (as in Alternative 3) or two detached ADUs, or one of each
2. minimum lot size of 2,000 ft<sup>2</sup> for detached ADUs
3. increase in maximum height of three feet over the existing limit, regardless of lot width, for detached ADUs
4. increase in maximum height of two additional feet for projects with green roofs or those pursuing the city's "Priority Green" program
5. maximum size limit of 1,500 ft<sup>2</sup> for attached ADUs
6. removal of the occupancy limit on unrelated people
7. allowance for placement of a detached ADU in a lot's front yard or side yard
8. removal of all restrictions on the location of entries for detached ADUs"

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

ADUs not only provide additional lower cost housing options, but also can help reduce displacement. Residents facing displacement pressure can gain rental incomes by producing ADUs. Reducing barriers to building ADUs and DADUs is essential to providing the housing mix that we need and to add units in single family zones.

- » **Thank you for your comment. The comment is noted.**

It would be best to remove any additional parking requirements for ADUs, not only in urban villages.

- » **Thank you for your comment. The comment is noted.**

## Anonymous 46

The question is a little unclear, but I prefer Alternative 2. I am strongly opposed to requiring additional off-street parking and do not think the owner-occupation requirement is beneficial.

» **Thank you for your comment. The comment is noted.**

I grew up on Queen Anne, in one of the now-most expensive of the single family areas. The housing prices there and throughout the city are unconscionable, particularly as household size goes down in many areas. I support Alternative 2 because it appears likely to lead to the greatest production of additional housing and will require the fewest additional parking spots in this city that is overwhelmed by cars.

» **Thank you for your comment. The comment is noted.**

I think the added variety will enhance the aesthetic appeal of single-family neighborhoods.

» **Thank you for your comment. The comment is noted.**

The changes in density are so minor as to be unnoticeable, and in any case are certainly compatible given the fact that density has decreased over the years as household sizes have gone down.

» **Thank you for your comment. The comment is noted.**

This does not appear to be an issue under any alternative.

» **Thank you for your comment. The comment is noted.**

This underscores the need to maximize the production of units.

» **Thank you for your comment. The comment is noted.**

## Anonymous 47

I support making it easier to build Accessory Dwelling Units. Please also do more to increase density throughout the city and to implement the full scope of the Housing and Livability Agenda in even more impactful ways.

» **Thank you for your comment. The comment is noted.**

I support making it easier to build accessory dwelling units. Our city needs more housing of all kinds, and removing current barriers and red-tape to expanding housing seems like a basic win-win part of the solution.

» **Thank you for your comment. The comment is noted.**

I do not think that the aesthetics of ADUs is valid criteria for making policy decisions on par with more important impacts like region-wide housing affordability and equity.

» **Thank you for your comment. The comment is noted.**

The population boom has a major impact on transportation region wide. While changes to ADU policy may have an additional effect on certain neighborhoods, I think that it is important to recognize that this is a system of a much larger issue that goes well beyond these proposed changes. Moreover, the current zoning rules and barriers to building ADUs is not fair because it only pushes these transportation

impacts into other neighborhoods where it becomes a much larger problem than if the impacts had been more spread out.

» **Thank you for your comment. The comment is noted.**

I support anything which will allow greater density in more parts of the city. While removing barriers to ADUs will not single-handedly solve the housing crisis, it is a step in the right direction and I can see no compelling reason not to make it easier to build an ADU.

Increasing density leads to both positive and negative externalities. Failing to increase density in certain neighborhoods also has severe consequences. In both cases, zoning policies can have far-reaching effects on housing prices region wide, and artificially limiting density in some areas leads to higher housing costs everywhere.

I believe that the land-use consequences of perpetuating the unsustainable single-family zoning model in approximately two-thirds of the land in the city has a much greater negative consequences region wide than the proposed changes would have. I also think that it is not fair to push the negative externalities of growth into certain neighborhoods in order to attempt protect other neighborhoods from the impacts of the population boom.

» **Thank you for your comment. The comment is noted.**

## Anonymous 48

I support the reduction of barriers to the creation of ADUs

» **Thank you for your comment. The comment is noted.**

Seattle needs more housing of all types. Encouraging the production of ADUs is one way to add more housing

» **Thank you for your comment. The comment is noted.**

Seattle needs more housing of all types. Encouraging the production of ADUs is one way to add more housing in areas zoned for single-family that is compatible with other uses of single-family areas.

» **Thank you for your comment. The comment is noted.**

Please move forward with the proposal to reduce restrictions on building of ADUs and DADUs

» **Thank you for your comment. The comment is noted.**

We need even greater changes to parking in single-family neighborhoods. I suggest a modest annual fee for a permit to park on the street in any residential area of the city. Perhaps the fee could vary based on demand.

» **Thank you for your comment. The comment is noted.**

## Anonymous 49

Alternative # 1

» **Thank you for your comment. The comment is noted.**

## Anonymous 50

A mandatory parking space must be required for all backyard dwellings. Too many homeowners are using these for Airbnb & VRBO income and NOT affordable housing as the City Council wants us to believe. I know, our neighbor applied for a permit under the guise of having their disabled daughter live in their newly constructed ADU. Well they lied and have started advertising it as a short-term VRBO rental.

» **Please see the frequent comment responses related to parking impacts and short-term rentals.**

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» **The comment is noted. Please see the frequent comment responses related to parking impacts and short-term rentals.**

## Anonymous 51

As a home owner, I have a huge interest in building a backyard cottage. The parking requirement is particularly deterring me though. I am very in favor of removing it. My lot doesn't have on site parking at all, so I'd have to add a spot where one doesn't exist. That means either a larger structure (at high cost) or losing a lot more surface area from my back yard. Those options alone are enough to prevent me from adding a cottage.

» **Thank you for your comment. The comment is noted.**

I live within blocks of the 40, 44, 28X, and D line. I have also never had an issue in 2 years finding a parking spot around my house. Yet it is zoned single family. That is too restrictive, and the minor change of making it easier to allow backyard cottages will not have any negative impact on parking or transportation.

» **Thank you for your comment. The comment is noted.**

Let's ease the restrictions. Smaller minimum lot size, no owner occupancy, no parking requirement, less restrictions on unit access (Seattle has a ton of clean maintained alleys).

» **Thank you for your comment. The comment is noted.**

My neighborhood is full of apartments that predate the restrictive single family zoning that was later enacted. Allowing backyard cottages won't ruin the aesthetics. Even with multi unit apartments on and within a few blocks of my home in a single family zoned area, the location is still quiet, beautiful, and desirable. Backyard cottages would not harm that.

» **Thank you for your comment. The comment is noted.**

Our housing stock is woefully underutilized. Family sizes are smaller so there are less people per house, per lot. Backyard cottages would allow more people per lot without having to force people to change

their family structure. A large portion of my neighborhood is rich young childless couples (like me) and empty nesters (my neighbors). Between us we own 10,000 sq feet of property for 4 people. We should house more people in this desirable area with access to transit.

» **Thank you for your comment. The comment is noted.**

You did the study, you saw that population has decreased in a lot of single family census tracts. The utilities can handle some cottage residents, no problem.

» **Thank you for your comment. The comment is noted.**

## Anonymous 52

I think the current "eight people per lot" is reasonable. So as long as the ADUs are tiny houses (rather than large developments) it can be safe to allow the current values to remain unchanged.

» **Thank you for your comment. The comment is noted.**

Since the people living in the DADUs (rather than the AADUs) are more likely to be unrelated to those in the original residence they are therefore unlikely to share a car with those in the original residence. That is why although additional parking is always recommended, only the DADUs should be required to have a parking space.

» **Thank you for your comment. The comment is noted.**

The goal of this reform is to encourage more housing so in order to maximize the living space it makes sense for residences to have the option to build both forms of ADU (lot size permitting). That said, I think that only the DADUs should be required to have an additional parking space since the people living there are more likely to be unrelated to those in the original residence (and therefore unlikely to share a car with those in the original residence). Garage space should never be counted towards gross floor area because it would be counting it as a livable space. However, my reasoning is that if it holds a car, it's unlikely to double as something like a kitchen or bedroom. As for available heights of the units, the second alternative is best; in reality height shouldn't matter unless a developer is attempting to add a four-story unit in a low rise limit (which is ridiculous). My last comment is to the requirement of the owner to live in one of the houses. This is a great idea when limiting huge scale developers, but for families just renting a property--the targeted audience of these reforms--it could become a nightmare. For that reason, the requirement for the owner to occupy the house should be removed or at least shortened to something along the lines as 'residency during the first year'.

» **Thank you for your comment. The comment is noted.**

The reforms, overall seem like a good idea. I am especially fond of how it eases the role of noncommercial parties in aiding Seattle's need for housing.

» **Thank you for your comment. The comment is noted.**

As a project designed to encourage construction of more living spaces, so long as these facilities meet the living and privacy requirements, aesthetics such as backyard coverage are irrelevant. This also means that building height and roof features don't require regulation unless they are outrageously different from the surrounding structures.

» **Thank you for your comment. The comment is noted.**

Looking into the cost is certainly an important issue. I understand that specific areas of Seattle charge more based on location, but this should simply be a project to house the in-laws or supplement to

owners' current income. Seattle as it is has a huge gentrification problem where everywhere you go allows for overcharging and a continuous raising of rent. The reforms for the ADU projects are intended to help create more housing, so shouldn't it be affordable housing? For that reason, strongly agree with a limiting system for rent (should the owners decide to rent the space). Although the owners should expect to get benefits based on the area they build in, as ADUs are only additional units, it is my strong belief that rent should not take on the value of a whole house or any value larger than that the main structure on the property. Property limitations on minimum requirements to build should be low but not inhumanely so. If eight people total are allowed per lot, the reform should only allow lots that can provide a reasonable space (in addition to that required additional parking spot).

» **Thank you for your comment. The comment is noted.**

With a growing population, public services are a must. However, as the number of residents per area will not increase drastically, public services should continue to serve on a need-based system rather than assume a huge influx of residents and therefore a greater need. The city's plans should change for the people not the other way around; the ADUs shouldn't be limited by these services.

» **Thank you for your comment. The comment is noted.**

### Anonymous 53

End all barriers to developing ADU and DADU, legalize duplex everywhere. Maximize and incentivize their creation.

» **Thank you for your comment. The comment is noted.**

### Anonymous 54

DADUs should not require onsite parking. Many renters I know solely rely on public transportation or rent-by-use vehicles.

» **Thank you for your comment. The comment is noted.**

Fully in support of Alternative 3

» **Thank you for your comment. The comment is noted.**

Fully support alternative 3.

» **Thank you for your comment. The comment is noted.**

Our kids are 5th generation on Queen Anne Hill and we are nearing retirement. Allowing us to build a DADU would enable us to stay in the city that we adore. Without such an option, we'll need to sell our family home since 1962 because we won't be able to afford taxes. We are heartbroken.

» **Thank you for your comment. The comment is noted.**

Strongly support alternative 3

» **Thank you for your comment. The comment is noted.**

## Anonymous 55

I would be more in support of a maximum number of parking spaces, rather than a minimum.

» **Thank you for your comment. The comment is noted.**

Allow people to build homes the city desperately needs. We should be going further and allowing everywhere in Seattle to increase in density while supporting efforts to not only halt displacement, but make room for those already displaced. Invest in communities, allow them to shape their future but do not allow them to exclude people.

» **Thank you for your comment. The comment is noted.**

More density and people is good. No more single family zoning.

» **Thank you for your comment. The comment is noted.**

More homes please.

» **Thank you for your comment. The comment is noted.**

More housing, less displacement

» **Thank you for your comment. The comment is noted.**

More people to help pay = good

» **Thank you for your comment. The comment is noted.**

Yes

» **Thank you for your comment. The comment is noted.**

## Anonymous 56

Lots should be allowed 2 ADU's and a DADU / Incentivize affordable rentals by eliminating development charges for units when the owners commit to holding them as a rentals affordable to people making under 60% AMI for 15 years / Incentivize green building standards / Incentivize rentals of more than one month by lowering development charges for homeowners who commit to month-plus-long rentals for at least 10 years. / Lower the minimum square footage for lots that can support DADU's and ADU's to 2500 / the ability to build ADU's should never depend on adding parking

» **Thank you for your comment. The comment is noted.**

## Anonymous 57

I know more ADUs will make it harder for us to be a two car family without off-street parking and we will probably need to opt for more transit and car sharing. So be it.

» **Thank you for your comment. The comment is noted.**

I am a single family home owner. I realize that by increasing supply of housing, ADUs could in theory reduce the value of my home but believe that this danger is offset by potential to create richer, denser, and more diverse communities and combating homelessness and blight.

» **Thank you for your comment. The comment is noted.**

I support ADUs and would encourage their use throughout the city.

» **Thank you for your comment. The comment is noted.**

I think single family housing area benefit by offering ADUs because they allow for more economic diversity while maintaining a less dense feel.

» **Thank you for your comment. The comment is noted.**

The aesthetics that matter to me are keeping trees and reducing homelessness.

» **Thank you for your comment. The comment is noted.**

### Anonymous 58

Support alternative 1. The parking issue is not going away anytime soon. Better public transportation helps but what if you want to go hike in the mountains? It will take a car. People are going to have cars.

» **Thank you for your comment. The comment is noted.**

Great work to support a poorly thought out solution to how to get people to new jobs due to over development of business assets.

» **Thank you for your comment. The comment is noted.**

Support alternative 1. Over time cheaply constructed housing on alleys will cause a degradation of the City's livability.

» **Thank you for your comment. The comment is noted.**

Support alternative 1. Why should residents of the City support big business's overbuilding. Jobs are created but at what cost? I don't want to subsidize developers who are responsible for these problems.

» **Thank you for your comment. The comment is noted.**

Support alternative 1. If a dwelling unit is behind a unit facing the street, it needs a fire sprinkler system as advised by the Seattle Fire Department.

» **Thank you for your comment. The comment is noted.**

Support alternative 1. I think in the long run a city will be created that people want to get out of. None of this will create affordable housing. All of this is an attempt to support the over building in the City core of office buildings. We should not be in the business of fixing poor developer business decisions.

» **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Support alternative 1. It looks like ADU's have been allowed prior to changing the Code. They need an approved fire suppression system like sprinklers as the Fire Department does not want to fight a fire from the alley. Additional housing will not be affordable.

» **Thank you for your comment. The comment is noted.**

## Anonymous 59

I support working on changes in building and other codes in the city of Seattle to allow living full time in tiny houses on wheels, with no minimum size requirements.

I also support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of

available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

### Anonymous 60

Alt 1 already addresses the ability to add an additional living unit, with a parking requirement, and to me is a compromise. We don't need 3 units on small urban lots, and we don't need to "look to other way" by denying the new occupants won't come with cars and walk to a bus stop ( where the C line is already at or above capacity during commute times)

- » **Thank you for your comment. The comment is noted.**

Alt 1 no change

- » **Thank you for your comment. The comment is noted.**

### Anonymous 61

Reducing parking will benefit the environment by encouraging folks to use alternatives to single occupancy vehicles such as walking, biking, and transit.

- » **Thank you for your comment. The comment is noted.**

Increasing density is very important in meeting our climate change goals. For this reason, we need to proceed with this planned change to City regulations.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 62

Of the three options Alternative 2 is the best. In order to tackle the housing problems in Seattle we need more housing and need to increase density. There is no need for off street parking and owner occupancy is unneeded.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 63

I am mostly in favor of Alternative 2 though I'd prefer that the following were true: decrease the minimum lot size even further (2000 sq feet?). I like the removal of needing off-street parking (my neighborhood

has plenty of street parking, for instance) and the fact that ADU and DADU users do not need to be related to the owner.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

## Anonymous 64

Please vote for alternative 2!

- » **Thank you for your comment. The comment is noted.**

As my parents age, they have said they can no longer afford to retire in Seattle. I'm an only child. I need them close by to take care of them. I need to be in Seattle in order to work. By having a comfortable place for them to live close by I can take care of them and know they are safe.

- » **Thank you for your comment. The comment is noted.**

Please vote for alternative 2!

- » **Thank you for your comment. The comment is noted.**

## Anonymous 65

I would urge the adoption of Alternative 2, the superior means to aggressively tackle our housing shortage and provide additional homes for individuals and families throughout the city.

- » **Thank you for your comment. The comment is noted.**

I'm excited to see the growth of our transit, bicycle and pedestrian network and am depressed to see the ongoing focus on private cars and parking in an urban area.

- » **Thank you for your comment. The comment is noted.**

## Anonymous 66

Of course, none of these would be large enough to require design review. Views would be blocked with no guarantee that compatible or attractive architecture would be required. These terrible ideas should not be entertained.

- » **Thank you for your comment. The comment is noted.**

Likely the value of the property would rise and displace those who did not have the resources to build the units or who wanted to maintain some type of yard or gardening space. Many such existing spaces are AirBnBs now, which do not add to the housing stock. These would not be much larger than apartments which just today were reported to have a rising vacancy rate. Not good for socioeconomic health of the neighborhood and would encourage speculators to buy up property and thus drive up prices for the lots as they are. Seattle is a fairly health conscious city. Increased density will destroy bird and wildlife habitat, along with our canopy. Research demonstrates that being in an environment where you can hear birds and appreciate some nature positively impacts health. More density and forced living with even less private space tends to bring more noise pollution and less privacy, both contribute to stress in human beings. This is an unnecessary drive toward an imagined need for more small units.

- » **Thank you for your comment. The comment is noted.**

It is not necessary to make changes to allow more of this type of development. Seattle is already beginning to build a glut of apartments. It would not necessarily increase the type of housing that is most underserved--single family and may overtax the existing infrastructure and would lead to the destruction of even more of our canopy. Before moving forward, we need to know that there is a real need and who this would really serve. Begin by not allowing AirBnBs in residential--non comercial neighborhoods. If this type of housing is needed, ban the curent 5000+ units of AirBnB that are eating up this space.

- » **Please see Section 3.2, Planning Context, for added discussion about short-term rentals.**

Yes, likely the current infrastructure does not anticipate this degree of density and land use. Many homes would stand in the shadow of those boxy three story homes and much yard space and canopy that currently helps with shade and clean air would be destroyed. Drainage would change and less ground would exist to absorb water. Parking would be a disaster. We would become even less family friendly than we are now.

- » **Please see Section 4.5, Public Services and Utilities, for a discussion of utility impacts; Section 4.4, Parking and Transportation, for an analysis of likely parking impacts; and Section 4.3, Aesthetics, for an illustration of aesthetic impacts, including shade and shadow.**

It is not necessary to make changes to allow more of this type of development. Seattle is already beginning to build a glut of apartments. It would not necessarily increase the type of housing that is most underserved--single family and may overtax the existing infrastructure and would lead to the destruction of even more of our canopy. Before moving forward, we need to know that there is a real need and who this would really serve. Begin by not allowing AirBnBs in residential--non comercial neighborhoods. If this type of housing is needed, ban the curent 5000+ units of AirBnB that are eating up this space.

- » **See Chapter, History and Planning Context, for background on Seattle's housing crisis and Section 1.2, Proposal Objective, for discussion of the proposal's objectives. See also the frequent comment response related to short-term rentals.**

Well there seems to be no limits or requirements that short term rentals not be an option for these units. The tourists often arrive with a car. RPZs increase the cost of living for current residents. While not all adu residents will not own a vehicle, many will. Also many transit friendly neighborhoods are experiencing very full buses and there is not guarantee that the street infrastructure exists to accomodate yet even more buses. We do not need more stress around the need for parking.

- » **Thank you for your comment. The comment is noted.**

With increased density the odds of fire and emergencies increases. When buildings are squeezed too close together any fire in one is more likely to damage another. Emergency vehicles may have a more difficult time accessing the small units and be negatively impacted due to the congestion caused by so little parking and people driving around trying to find parking and their visitors.

- » **Access for the Seattle Fire Department is part of the fire and life safety review that the City undertakes for any application for development.**

## Anonymous 67

Alternative 2 has my support. Alt 3 is my fallback.

- » **Thank you for your comment. The comment is noted.**

## Anonymous 68

No additional parking for up to two ADUs is preferred.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is best. Alternative 3 is second best. No action is a loser.

- » **Thank you for your comment. The comment is noted.**

## Anonymous 69

Alternative 2

- » **Thank you for your comment. The comment is noted.**

## Anonymous 70

I could support Alternative 3. It provides the best protection for our single family neighborhoods while allowing an increase in affordable housing.

#2 would result in a proliferation of developers & investors ripping down existing dwellings and manipulating every rule to their profit advantage, while maintaining high price rentals. There MUST be an owner (or co-owner) living there for the duration.

- » **Thank you for your comment. The comment is noted.**

Seattle's Exceptional Tree rules are a joke. The definition applies to ridiculously few trees and all that is required to cut one down is to bemoan that it would make building more difficult. Our current residential canopy needs to be maintained and this is not happening. Our natural ground water runs amok and soils slide whenever we lose trees in our neighborhood.

- » **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

We must consider our tree canopy as more than an 'aesthetic' value. It is essential to human health & well being, especially in a hectic urban environment. Currently permitting up to 3 trees to be removed from a residential property every year without replacement is incredibly wrong. For builders to be allowed to cut mature evergreens and then substitute deciduous trees is also a totally unbalanced solution - there is absolutely no comparison for the amount of air purifying that takes place. Whichever 'alternative' is adopted, there needs to be requirements that trees are maintained, with a preference given to evergreens for year round benefits.

- » **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

## Anonymous 71

These are probably intentionally misleading drawings - power lines and city tree codes inhibit size of trees on streets.

- » **Please see Section 4.3, Aesthetics, and Appendix C for information about the methodology used in the aesthetics modeling and analysis.**

Hi, Sorry I accidentally submitted demographics and no answers the first time, I didn't understand how it worked so it may look like I submitted it twice but I didn't.

» **Thank you for your comment. The comment is noted.**

Only rich people can afford to remodel their small house for ADA's.

» **Thank you for your comment. The comment is noted.**

Transportation needs major investment by business taxes since their employees contribute to most traffic: there needs to be subways and lite rail or even a monorail East West or North South. There needs to be more than one N/S line in Seattle and more than one E/W line to Eastside. Needs to be robust. Our current situation is not good for emergencies. We need more totally protected bike lanes and paths like the Burke Gillman. Bikes on busy city streets with green stripes but without barriers are ridiculously unsafe. An overpass for Burke Gillman missing link would be nice. People who drive on busy streets should not have to risk hitting bicyclists and feeling guilty the rest of their lives. Everyone gets in vehicle accidents now and then. There needs to be biking and local only transport streets parallel to arterials and they they need to have 15 mph speed limits ....the State rules on local speed limits need to be over-turned to do this. I have to admit I question the sanity of politicians who think housing is solved by ada's and transportation is solved by biking on busy streets and one light rail line with a bottleneck going through downtown is the answer. Surely the creative geniuses who live in Seattle or work for the University can help plan something better than this.

» **The comment is noted. The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Broader transportation policy and requirements are outside the scope of this EIS.**

High rises - 10-20 stories in a very few areas have less impact on green space.

» **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding high rise structures are not considered as part of the proposed Land Use Code changes and are outside the scope of the EIS.**

Totally misleading study leaves out best solution to housing - the best solution by far is high rises in a few areas 10-20 story such as on Greenwood Ave or Roosevelt far North, 35th Ave in South Seattle, and Central Seattle, all the ADA solutions impact our real estate value, our pleasant back yards, our birds, bees and wildlife, our gardens. Fewer people and home owners would be impacted if made high rises on a few streets, ideally at tops of hills on arterials or one street behind. Our home is our main investment and we cannot afford to redo it or move.

» **Thank you for your comment.**

My name is Kimberly Kinchen. My household is made up of two adults in a 650-sqft co-op condo on Capitol Hill. I support more housing in urban areas because it will help stall the wild increase on housing costs we have seen in this region, create more options for housing (not everyone can afford or wants to live in a single-family home), and reduce pressure to build outward instead of upward. Creating more options and fewer restrictions for so-called soft infill like ADUS, DADUS and the like also makes it easier for long-term sfh residents to stay in their homes as prices rise and property taxes increase, by providing a revenue stream. Further, because Capitol Hill has already borne the brunt of so much dense housing growth, relaxing restrictions on ADUs and the like could relax the disproportionate responsibility that my neighborhood has taken on in the current boom.

» **Thank you for your comment. The comment is noted.**

### Anonymous 73

This is absurd. While I fully support affordable housing this isn't the answer. Why is there an 'OR' in the proposal. Developers have an out. They build & can pay a fee or agree to build affordable housing in different areas. Take out the 'OR,' have developers agree 100% of their units will be rent controlled for 20 yrs. & see how many developers will agree to this. They are the ones making millions. The community is left w/ dealing w/ the infrastructure of increased parking, water, sewerage & we will not see reduced rent!

- » **Please see Section 4.1, Housing and Socioeconomics, for a discussion of how the proposal may impact affordability and Chapter 2, Alternatives, for a description of what is included related to reducing costs. See also Section 3.2, Planning Context, for a discussion of additional strategies the City might consider to reduce costs and increase the affordability of ADUs. Please also see the response to frequent comments related to housing affordability.**

### Anonymous 74

go with alternative #3

- » **Thank you for your comment. The comment is noted.**

### Anonymous 75

Please make sure DADus and ADUs don't result in loss of tree canopy or impacts to environmentally critical areas. flexible design standards are essential.

- » **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

Please require one off street parking spot for each ADU/DADU added to a lot.

- » **Thank you for your comment. The comment is noted.**

Please do not remove the owner occupied requirement.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 76

I have adequate off-street parking now as I am on a corner lot with off-street parking now.

- » **Thank you for your comment. The comment is noted.**

Building such an addition is an expense I would undertake and would be able to provide additional housing in Lake City. This would help keep rents more reasonable.

- » **Thank you for your comment. The comment is noted.**

I have owned house in Lake City since 1994. I live in New Hampshire due to work requirements. My house has a 1150 square feet detached garage. I want to build 2nd floor over the garage and rent it out until I retire in 6 to 10 years at which time I would live above the garage and rent out the house. The house is already rented out. To do so I need Owner-occupancy requirements of alternative 2 (no occupancy required) . If there is concern about investors buying houses to convert them to higher density, I suggest that alternative 1 be amended to allow owners that have owned their home for some number of years

(such as 3 or 5 years) to not be required to live on property. That would prevent buyers from buying with the intent to convert properties immediately.

A height limit of 18 feet to the bottom of the roof line is needed. My property is 63 feet wide and on a corner lot. Perhaps corner lots could have increased limits since they do not create large structures in the middle of a block.

» **Thank you for your comment. The comment is noted.**

I need ability to have separate electric service for the DADU. It needs to have its own postal address. It currently shares water and waste water service with the house, so having a code that allows for these three needs is preferred.

» **Thank you for your comment. The comment is noted.**

### Anonymous 77

Population is going to increase regardless of this legislation. This legislation will increase the options for housing.

» **Thank you for your comment. The comment is noted.**

I prefer Alternative 2 as it will remove the most barriers to building a backyard cottage. I see the owner occupancy requirement as a very large barrier to building a DADU which is probably most likely and preferred by many homeowners. Many homes do not have enough square footage to add an AADU and many people aren't comfortable with "sharing" their house. Adding a detached structure is a very expensive project when the future of where you are going to live is uncertain.

» **Thank you for your comment. The comment is noted.**

### Anonymous 78

I support alternative 2 and 3.

» **Thank you for your comment. The comment is noted.**

### Anonymous 79

Can 3,200 SF lot size be applicable to both option 2 and 3?

» **The final proposal can include any combination of the alternatives considered in the EIS. Please see Chapter 2 for a discussion of the Preferred Alternative. The Preferred Alternative includes reducing the minimum lot size required for a DADU to 3,200 square feet.**

Alternative 2 seems to be the best option although it seems arbitrary that only option 3 allows 2 AADUs. Why can't option 2 also offer that?

» **The final proposal can include any combination of the alternatives considered in the EIS. Please see Chapter 2 for a discussion of the Preferred Alternative. The Preferred Alternative includes allowing two AADUs.**

## Anonymous 80

My Lower Wallingford neighborhood has been inflicted/wounded over the past several years through the massive development along streets with zoning that allows for massive apartment complexes (i.e. Stoneway, Wallingford, 45th street). In addition, the plan with the urban village will dramatically hurt the neighborhood, This proposal will just POUND the last vestiges of single family zoning in lower Wallingford out of existence. All of the negative transformation has not resulted in lower rents, just profits for the businesses that build them (then flip them), rent out the rooms at rents that I could not afford. The bottom line is that there are too many high income folks living in the area that want to live here and building MORE UNITS will not lower the rents, ONLY REDUCE THE LAST BIT OF VALUE OF THE NEIGHBORHOOD, and only after business interests take their profits, and then the cost will go down b/c the building mess created the accumulation of the city permitted action will ruin the neighborhood.

» **Thank you for your comment.**

## Anonymous 81

I support option 2. Change the codes

» **Thank you for your comment. The comment is noted.**

## Anonymous 82

Seattle is having enough difficulty adjusting to HALA and growth without having to deal with disappearing green belts that are provided by neighborhoods. Don't change current AADU and DADU code.

» **Thank you for your comment. The comment is noted.**

What a disaster! Looks like an urban refugee camp.

» **Thank you for your comment. The comment is noted.**

Alternative 1 is the only reasonable choice. The other 2 choices are great for developers/builders and horrible for families, neighborhoods and livable Seattle. From what I have read, most AADUs and DADUs are used to generate income through venues such as Air B&B or VRBO. They are not used to house families. Without additional off-street parking requirements, neighborhood streets become impossibly congested and dangerous. Many single-family neighborhoods do not have reasonable bus service so cars are needed.

» **Please see Chapter 3, History and Planning Context, for information added on the City's existing regulations related to short-term rentals. Please also see the frequent comment response on parking.**

Forecasting what the economics of single-family housing in Seattle will do over the next 10+ years under all 3 but particularly the last 2 alternatives is based on so much uncertainty that it provides little more than vague possibilities. The global economy could tank, lots of out-of-town buyers could buy properties as investments and let them sit vacant. On the other hand, the \$275 head tax (which I favor) could reduce corporate employment and housing demand, the increasing numbers of aging Seattleites down-sizing is adding to the number of available homes, our overdue earthquake could appear and cause a great eastward migration, etc.

Until our city government (and county, state, etc) does something meaningful to fix the horrendous traffic problem, it has no business exacerbating the problem by enticing out-of-towners to move here so

they too can store their cars on the streets. Just because the city council let developers destroy lots of low-income housing units in order to build far less affordable units, does not mean that now they can try to fix their mistake by turning single-family neighborhoods into mini-motels with parking lots for streets and small patches of green for pet toilets.

» **Thank you for your comment. The comment is noted.**

The sentence: "However, no significant unavoidable adverse impacts on land use are anticipated as a result of the proposed Land Use Code changes." sums up the city council's approach of "grow till you rot". Of course there will be significant unavoidable adverse impacts on land use under Alternatives 2 and 3.

» **Thank you for your comment. The comment is noted.**

The estimated parking availability and bus frequency times used by the city are meaningless. In fact, city code was changed to essentially state that transit times on the bus schedules are always correct. Not. True.

» **Please see the frequent comment response concerning impacts to parking.**

### Anonymous 83

We don't need to put parking spots ahead of housing units. Alternative 2 is the best.

» **Thank you for your comment. The comment is noted.**

Alternative 2 is the best/most impactful. This city needs more housing. Let's make it slightly less difficult to build more housing.

» **Thank you for your comment. The comment is noted.**

I can't see any issues with choosing Alternative 2.

» **Thank you for your comment. The comment is noted.**

Seattle needs to sprinkle this development throughout the city. Don't just upzone a few blocks here and there (and make parking impossible in those areas). Allow scaled increases in density throughout the city. Only way to do this is Alternative 2.

» **Thank you for your comment. The comment is noted.**

Services and amenities become more efficient and robust with higher density. I want Alternative 2.

» **Thank you for your comment. The comment is noted.**

I would like to build an AADU and a DADU in south end of West Seattle. It would naturally be at affordable rents as the neighborhood is poorer than most other places of Seattle.

» **Thank you for your comment. The comment is noted.**

### Anonymous 84

ADUs without parking should only be allowed in urban centers/villages.

» **Thank you for your comment. The comment is noted.**

I oppose Alternative 2. To reduce barriers to creating ADUs, it makes sense to remove the parking space requirement. However, increasing the number of ADUs per lot, and also excluding garage/storage in the calculations for max gross floor area, would create loopholes against the spirit of ADUs. People will build larger garages and storage, or what they can classify as such, to increase usage space to augment the max gross floor area. Also, by increasing the maximum rear yard coverage to 60% if DADU is <15 feet, that is encouraging cheaper horizontal than vertical builds. All of these negatives point to less efficient development, loss of green space, and more costs for drainage, pollution, climate change, and environmental health.

Alternative 3 is not much better, by allowing 2 ADUs. This largely benefits larger landowners, which will increase wealth inequity in Seattle. Also, larger parcels of land may not be where transit is convenient and density should be increased.

Take Alternative 1 and remove the parking requirement. Increase max gross floor area of DADUs to 1000 sf or more if you have to. Alternative 1 has been in place without causing significant issues (which is a great marker of good policy) and needs more tweaking than wholesale changes.

» **Thank you for your comment. The comment is noted.**

Charge properties drainage fees based on contributing impervious area.

» **Thank you for your comment. The comment is noted.**

Obviously green space and trees would be better, but to balance housing needs and vegetation, it would help to have Alternative 1 with modifications discussed above which is more likely to lead to dense, vertical development.

» **Thank you for your comment. The comment is noted.**

Who do ADUs benefit? Homeowners, who are less housing cost burdened in Seattle than renters. Of homeowners, who do ADUs benefit? Those with large lots, by and large. If those larger lots are in a desirable neighborhood, ADUs are going to benefit wealthier landowners. If those large lots are in a less desirable neighborhood, chances are that area is less centrally convenient and increasing density might overwhelm the local transportation network. But the bottom line is, yes, alternatives 2 and 3 might increase the housing supply, but it will also exacerbate wealth inequality in a stratified Seattle.

» **Please see Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Well designed density would be the most efficient.

» **Thank you for your comment. The comment is noted.**

## Anonymous 85

I favor a No Action Alternative.

» **Thank you for your comment. The comment is noted.**

Lot lines are already non-existent in many areas; this is not appealing. Again, this is more loss of green space.

» **Thank you for your comment. The comment is noted.**

Adding more ADUs decrease the amount of green space.

» **Thank you for your comment. The comment is noted.**

Rather than add more housing options the city should work with multifamily dwelling units/apartments/ etc on reducing housing costs.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

## Anonymous 86

I support more Accessory Dwelling Units and would like to see the final EIS recommend: 1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8. Support raising maximum household size, total number of residents on site to 12. This also allows for people in communities that practice multigenerational living to feel included in the Seattle community as a whole.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

## Anonymous 87

I support Alternative 2

» **Thank you for your comment. The comment is noted.**

## Anonymous 88

My name is Marina Gordon. I live in Wallingford with my husband and daughter. I want more housing because I'd love to see that a wider range of people can have access to Seattle housing similar to what I had when I moved here in 1992 and bought a home in 1993.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases unfeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
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8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing

elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

### Anonymous 89

Alternative 3 would encourage more parking spaces overall in the city, which is counterintuitive with the changes the city is making to encourage mass transit and biking in lieu of car use. Alt 3 would increase the number of ADU's while requiring additional parking. I am strongly opposed to Alternative 3.

- » **Thank you for your comment. The comment is noted.**

The extra off street parking space requirements needs to go. We don't have the space on the street. We need to go with Alternative 2.

- » **Thank you for your comment. The comment is noted.**

I will do my own little part to help alleviate the housing crisis by building a DADU cottage if Alternative 2 passes. But I can't if Alternative 3 passes. Alternative 2 should be passed with no revisions.

- » **Thank you for your comment. The comment is noted.**

My preference is Alternative 2. I would love to build a backyard cottage so my family can share our home with another family (and will if this option passes). However, to invest the several hundred thousands of dollars to do so, I need to know that we can recoup that investment when we someday sell. The owner occupied requirement will limit the interest from future buyers and it is exceedingly difficult to find a reasonable bank loan if this limit is in place.

- » **Thank you for your comment. The comment is noted.**

The report makes it clear that there would be more housing created in Alternative 2 while keeping housing affordable. Given our lack of housing, supporting Alternative 2 seems like a no brainer.

- » **Thank you for your comment. The comment is noted.**

Providing more living space is the only way we can reduce our housing shortage, just like you reduce a food shortage by importing more food.

- » **Thank you for your comment. The comment is noted.**

## Anonymous 90

Don't require added parking for DADU/ADU units! The young people who are going to move in there are unlikely to own cars, ever. Car sales are plummeting in the urban US. Self driving cars and ride share will start to take care of our parking crises around the time that these ADUs go into effect, so prioritize people over parking.

» **Thank you for your comment. The comment is noted.**

Alternative 2 is the best way to keep this city from becoming completely unaffordable and non diverse. San Fran's culture has been completely eroded by the rich and the tech bros. Let's prevent that here!

» **Thank you for your comment. The comment is noted.**

Alternative 2 is the best way to keep this city from becoming completely unaffordable and non diverse. San Fran's culture has been completely eroded by the rich and the tech bros. Let's prevent that here!

» **Thank you for your comment. The comment is noted.**

ADUs are so much better (and affordable) than high rises!

» **Thank you for your comment. The comment is noted.**

## Anonymous 91

I think this is a major concern as the cosmetic of Seattle will be negatively impacted by these boxy new builds. Seattle's traditional neighborhoods and streets that have been a staple for many communities will be ripped (literally) apart by homes on postage stamp size "lots." Where will all the kids play? In the streets?

» **Thank you for your comment. The comment is noted.**

Unfortunately parking is already a major challenge and increasing density will create an even bigger challenge.

» **Thank you for your comment. The comment is noted.**

I don't believe these codes need to be relaxed as it relates to ADU's or backyard cottages. Simply put, revising these zoning restrictions will compromise the lifestyle that manner homeowners originally purchased into. Many folks (including myself) purchased a home because of it's SFR zoning and enjoy lighter traffic, parking availability, and space. Allowing for higher density negatively impacts traditional Seattle neighborhoods.

» **Thank you for your comment. The comment is noted.**

Many homeowners are faced with challenging situations as the cost of living in Seattle has increased. The potential of higher priced real estate surrounding them could make paying their (increased) property taxes unattainable.

» **Thank you for your comment. The comment is noted.**

Seattle clearly has a growing population - knowing this, it's important to avoid growing in the wrong ways. Rather than adjusting land use codes for SFR's, why can't there be affordable options to buy into

condo's (versus all the apartments). There should be conversation releasing developers of liabilities with condominium projects.

» **Thank you for your comment. The comment is noted.**

Many Seattle neighborhoods don't even have an option to connect to the City's gas line - our infrastructure is not setup to handle the stress of a higher capacity of usage.

» **Thank you for your comment. The comment is noted.**

## Anonymous 92

Anything other than option #1 is going turn our City into a trashpile of outsourced rentals with zero accountability.

» **Thank you for your comment. The comment is noted.**

## Anonymous 93

Overall, alternative #2 seems to be the most effective option to reduce barriers to the creation of ADUs. The FAR requirement in alternative #3 seems particularly restrictive and against the objective of this revision process. Taking no action (alternative 1) will result in excessive regulations on parking that have no positive impact on the street parking situation as demonstrated in this survey data.

» **Thank you for your comment. The comment is noted.**

## Anonymous 94

My name is Michael Nash. My household is made up of myself and my wife. I live in District 5. I want more housing because we are currently rent-burdened and considering having children soon. I have friends who are also rent-burdened or homeless. Allowing more people to move to Seattle can help reduce climate change.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
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4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
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7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.
10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.
11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.
  - » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Please choose alternative 3 to allow the most ADUs to be built.

- » **Thank you for your comment. The comment is noted.**

## Anonymous 95

I support the loosening of regulations on building DADUs/ADUs. I think the population will benefit and impact will be mostly positive.

- » **Thank you for your comment. The comment is noted.**

YES!

- » **Thank you for your comment. The comment is noted.**

## Anonymous 96

I think the requirements on parking should be eased and there should not be requirements that single family homes, DADUs, or AADUs, require preservation of parking. At least in our neighborhood, there is sufficient street parking. Also, less parking may cause people to drive less, which would be a plus. This should be mitigated with increased funding for mass transit or bicycle infrastructure. (E.g. condition the grant of a waiver of a parking place requirement on a one-time \$500 fee dedicated to bicycle infrastructure.)

» **Thank you for your comment. The comment is noted.**

We already have a mixed type architecture in the City. I prefer alternative 3, and then 2, in part because this may decrease the number of "tear downs" in the City. What I do not like, are blocky new construction homes that completely fill the building envelope and dwarf their neighbors.

» **Thank you for your comment. The comment is noted.**

The rules should be amended so it is easier to put up DADUs and AADUs.

» **Thank you for your comment. The comment is noted.**

I am hopeful that the creation of more DADUs and AADUs will ease our affordability and homelessness problems.

» **Please see Section 4.1, Housing and Socioeconomics, for a discussion of how the proposal may impact affordability.**

I support alternative 3, and 2, in that order of preference. I want the City laws to be changed so that it is easier for property owners, like our family, to permit and build AADUs and DADUs and to increase the number and variety of housing choices in single-family zones, like the one where we own our home. I think this is totally doable and will be a positive change for our community.

» **Thank you for your comment. The comment is noted.**

## Anonymous 97

This study is very one sided and unrealistic.

» **Thank you for your comment. The comment is noted.**

Alternatives 2 and 3 are completely insensitive to the discourse related to the initial proposal. Current traffic and utilities will not support the proposed action nor the alternative. Do the work, review block by block for expansion of ADUs or DADUs or choose alternative 1 until sufficient time and planning can occur for more controlled growth.

» **Please see the frequent comment response regarding individual neighborhood review.**

Our aged sewer lines are simply not up to par and would require extensive costs and will take years to update. This work would need to be completed prior to passage of the new zoning.

» **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

Expectations of this study are unrealistic for 10 year scenarios and beyond.

» **Thank you for your comment. The comment is noted.**

Parking on Queen Anne is not as sparse as shown in the studies and the 10-year scenario is unrealistic with alternative 2 or 3.

- » **Please see the frequent comment response concerning impacts to parking.**

Construction downtown has not included sufficient affordable housing due to the low penalties for new construction. The low fees allowed developers to build high-end homes without affordable and only raised the prices for the high-end homes. Taking it out on the urban villages is not called for and a better plan for growth must be considered.

- » **The proposal evaluated in the EIS is related to proposed changes to the Land Use Code for the construction of ADUs in single-family zones. Changes within urban villages are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

City planners are only concerned about affordable housing but not willing to do the work to better control growth. There should be a campaign to enlist community counsels to review and assist with planning.

- » **Thank you for your comment. The comment is noted.**

## Anonymous 98

Please reduce the barriers

- » **Thank you for your comment. The comment is noted.**

We need denser neighborhoods

- » **Thank you for your comment. The comment is noted.**

We need density, and developers should pay impact fees toward schools & services

- » **The proposal evaluated in the EIS is related to proposed changes to the Land Use Code for the construction of ADUs in single-family zones. Impact fees are outside the scope of this proposal.**

Idk

- » **Thank you for your comment. The comment is noted.**

Who cares, cars should be less convenient

- » **Thank you for your comment. The comment is noted.**

## Anonymous 99

My preference is alternative 2, second choice of 3.

- » **Thank you for your comment. The comment is noted.**

I like that houses will be kept and converted to have multiple AADU

- » **Thank you for your comment. The comment is noted.**

I have few comments. With a big lot and facing up-zoning in my Urban Village, I will build tastefully and try to blend in with both my McMansion neighbor to one side, and whatever boxy LR-1 that will rise up to the other.

» **Thank you for your comment. The comment is noted.**

Alt 2 is best. It is important to make the process easier, to allow larger DADUs, and to allow both an AADU and a DADU on a property. It is so expensive to live in Seattle that owners may need the extra income and additional ADUs will help with the housing crunch. More unrelated people if there is both an AADU and a DADU.

Do not impose MHA if both an AADU and DADU.

The 1000 SF allowance should NOT include storage and garage.

» **Thank you for your comment. The comment is noted.**

Like all my neighbors in an Urban Village where parking will NOT even be REQUIRED, I am upset about the issue. We already have spillover from apartment complexes and townhouses.

As long as the City does NOT put in sidewalks -- or require us who develop ADUs to do so -- then maybe we can park perpendicularly to the road when the roadway is sufficiently wide. Where I plan to develop my AADU/DADU, there is already a sidewalk across the street, so please do not require me to spend a lot of money putting a sidewalk in front of my property.

The Alt 2 DADU can have a garage and enough house size for 2 bedrooms. Please allow the 1000 SF to exclude the garage and storage area!

» **Thank you for your comment. The comment is noted.**

I have few comments on this subject. I live in an Urban Village with a 11,000 sf lot. Easily accessible to North Seattle College, Ballard and Downtown. Probably will rent to students or workers taking the D Line downtown.

» **Thank you for your comment. The comment is noted.**

I have few comments on this subject. I live in an Urban Village with a 11,000 sf lot. I expect and somewhat welcome the densification.

» **Thank you for your comment. The comment is noted.**

I am worried about the sewer and water supply lines. If I have an AADU and a DADU will I have to have a 6 inch sewer line? And a 1" or more water line?

How do all the utilities get to the DADU?

What about firefighter access to a backyard DADU? I plan to have a driveway to the Alternative 2 garage and its 2 bedroom 1000 SF living space.

» **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems. Access for the Seattle Fire Department is part of the fire and life safety review that the City undertakes for any application for development.**

## Anonymous 100

Do not require parking for ADU, whether on- or off-street.

- » **Please see Chapter 2 Alternatives for a description of the Preferred Alternative. The Preferred Alternative would eliminate the off-street parking requirement for ADUs.**

Do not require parking for ADU, whether on- or off-street.

- » **Thank you for your comment. The comment is noted.**

Remove all parking requirements from ADUs.

- » **Thank you for your comment. The comment is noted.**

Do not let 'aesthetics' perpetuate the housing crisis.

- » **Thank you for your comment. The comment is noted.**

Increase density throughout the entire city.

- » **Thank you for your comment. The comment is noted.**

## Anonymous 101

It would be nice if there was some way to have DADUs be constructed in a similar style to their neighborhood homes, instead of having, for example, boxy structures stuck amongst mostly bungalow or Craftsman style homes.

- » **Thank you for your comment. The comment is noted.**

I think getting rid of the requirement for parking for an ADU/DADU is reasonable, especially given that the city is currently permitting apartment/condo buildings that are \*not\* required to provide one space per unit (I'm aware of several multi-unit, multi-story projects either recently built or under construction that provide residential parking spaces for less than 1/2 the number of units in the building). ADUs built in single-family neighborhoods will not significantly push more cars to park on the street. If potential renters are able to live closer to where they work, especially near transit, they may not want to drive a car anyway.

- » **Thank you for your comment. The comment is noted.**

My family lives in North Capitol Hill, in an area of single-family homes (except for the old time apartment buildings that are evidence of previous zoning rules that allowed multi-family dwelling). We moved to Seattle in 2005, and even then the price of housing here made my jaw drop. There are not a lot of affordable options IN the city, and it continues to get worse as prices rise. I would like to see the ADU/DADU rules changed to make it easier to build these units for several reasons: to allow multi-generational living more easily, to allow housing diversity beyond the boxy townhomes popping up in many areas, to allow more affordable housing for renters looking to live close-in to their jobs and thereby take more traffic off our roads (if renters use transit, bike, or walk), to allow homeowners to supplement their incomes while at the same time providing solutions to enable families without insane amounts of money to live in nice neighborhoods. If Seattle is serious about addressing affordable housing, not to mention the added side benefit of rectifying some of its shameful history of redlining residential neighborhoods to the detriment of families of color, the changes to the ADU/DADU rules are a good start.

- » **Thank you for your comment. The comment is noted.**

I support Alternative 2. It seems the most reasonable approach to me.

» **Thank you for your comment. The comment is noted.**

ADU/DADUs seem to me to provide one alternative to making housing more affordable in some of the more expensive neighborhoods in the city, which seems like a good idea. Additionally, if later in our lives we no longer want/need the size of home we have, it would also be nice to be able to move into an ADU/DADU on our property (if we build one) and rent out the house in our retirement years without being forced out of our home due to lower income in retirement.

» **Thank you for your comment. The comment is noted.**

## Anonymous 102

Permits drag the timeline and financial viability of the project for most individuals considering building a DADU. Please allow a more speedy processing time and a lesser number of corrections on permits. Also, time during correction cycles takes way too long! Maybe permit sets could be pre-approved pending that the last bits of final corrections are approved, allowing the architect to start ahead on bids, site and foundation work.

» **Thank you for your comment. The comment is noted.**

Dropping the parking requirement is critical to give a legitimate incentive for individuals to build DADU on their lots. Hopefully, this initiative can also give a long term incentive for the city to build more public transportation since density in some areas will increase due to the construction of DADUs.

» **Thank you for your comment. The comment is noted.**

Alternative 2 is best suited given the housing crisis in Seattle

» **Thank you for your comment. The comment is noted.**

Allowing the owners to not live on the lot on which they build a DADU would allow more owners to consider building a second home for someone else.

» **Thank you for your comment. The comment is noted.**

Allowing for 1,000 SF would allow a family to comfortably live in a DADU.

» **Thank you for your comment. The comment is noted.**

## Anonymous 103

I have two concerns related to the lack of requirement for on-site parking.... I know studies were done showing the percent of current use of on-street parking and showing there was room for more cars on the streets so in essence justifying that when ADUs are added to a property that they do not have to provide on-site parking. This type of research does not take in to account pedestrian safety or the increased car break-in crimes in the whole city. I live in NW Seattle where there are no sidewalks. When all of the cars are parking on the street, that puts the pedestrians out in the street. With cars parked on both sides, there is not enough room for two cars to pass in either direction and for pedestrians... and/or strollers and bicycles which is already dangerous. The cars park so close to the intersections it is impossible to see on-coming traffic when you are trying to turn. In addition, having more cars on the street provides more opportunity for auto break-ins in a city that is battling opioid addiction and increased crime. Putting more cars on the streets makes this worse!

I know the city is encouraging Seattleites to get rid of their cars so they think not requiring on-site parking is okay.... I think the idea that Seattleites will get rid of their cars is also unrealistic. People typically move to Seattle not just for their jobs but because they like the outdoors. They like to hike, ski and boat which all require a vehicle. They might take public transportation to work but they have cars for the weekends. Uber and Lyft are not going to take people to the trailheads or up skiing. I know the city is trying shuttles to get people to trailheads... the reality is.... most true hikers will avoid those hikes because they will have too many people. Shuttles will be good for a few but not the majority of hikers... or skiers.

Please take these factors in to consideration in the environmental impact studies.... and require on-site parking....

I also am bothered by buildings being built that do not fit in to the neighborhood architecture.... I hope there will be stronger requirements for design review and that the architecture should blend in with the existing structure and neighbors. I have seen too many tall boxes that loom over smaller neighboring houses blocking their light and making it impossible to garden other than a shade garden.... and offer no pleasant architecture.

- » **Please see the frequent comment response concerning impacts to parking.**

## Anonymous 104

ADUs will contribute to higher densities, which will allow for better transit service. This is the only real way to improve Seattle's transportation system.

- » **Thank you for your comment. The comment is noted.**

As someone who grew up in and still lives in Seattle's single family neighborhoods, I would like to say that any change in the character of the neighborhoods is minimal and unimportant.

- » **Thank you for your comment. The comment is noted.**

Cities have buildings in them. More buildings won't have a negative impact on that.

- » **Thank you for your comment. The comment is noted.**

Please expedite the implementation streamlined ADU regulation. This city has a housing shortage. That concern is more important than any other.

- » **Thank you for your comment. The comment is noted.**

Whatever concerns exist regarding utility services, they should not be used to restrict ADU construction.

- » **Thank you for your comment. The comment is noted.**

## Anonymous 105

As a homeowner in an area zoned SF7200 (Pinehurst neighborhood) I have the luxury of a small house on an 8000 square foot lot. I have two goals in commenting on this proposal. The first goal is to encourage more dense housing in Seattle generally and in my Northgate/Lake City area particularly. The second goal is to allow me to reasonably construct a DADU backyard cottage on my own property sometime in the next 5-10 years. In that time, I will want an option to house my parents, or my children, or use it as rental property.

Other people more knowledgeable than I will comment on the broad implications of the various ADU specifics, I am going to say only a few things that affect my personal decisions. I realize that my comments are only anecdotal, but they may be representative of Seattle homeowners generally.

Regarding parking requirements. Given the layout of my lot, adding additional parking and a proper driveway into the rear of the yard will absolutely prohibit any DADU development. I live in an area that's easy walking distance to two roads (15th Ave NE, Lake City Way) that well-served by public transit and so there's no need for the city to insist on storage for a privately-owned vehicle. Current zoning for parking requirements is based on transportation patterns of fifty years ago, and to assume that those patterns will carry forward even ten years into the future is insane. On my lot, a parking requirement would dramatically increase the cost of adding any structure, to the point that I will abandon thinking about it at all.

The lot size requirements restrict flexibility in building structures. My own lot has quite a few trees, and I would prefer to maintain as many as possible. For that reason, I would prefer as few predefined "aesthetic" restrictions on the building as possible. Each additional restriction means additional constraints, and likely, additional costs. For me, building a DADU will be affordable if I can use stock plans and as much prefabrication as possible, which means I need the regulations to be flexible to fit what I can afford to do.

As for other issues, I'd prefer to see the owner occupancy restriction relaxed. I certainly have no objection to having neighbors who are partly or wholly renting their houses or backyard cottages. My neighborhood adjoins a quite a lot of apartment buildings along 15th Ave NE and along Lake City Way, and owner occupancy is just not a problem.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

Please discard as many parking requirements as possible, and let the city evolve with alternative transportation patterns.

- » **Thank you for your comment. The comment is noted.**

## Anonymous 106

Not much to comment about parking here. However as a cyclist for both commute and errands I would love to see continuous improvements in the biking infrastructure. Adding more density should make those investment have a higher return. Higher density also makes high frequency transit more feasible. I live in Magnolia and we don't have a single 10 or 15 minute line. I hope that the added density would make it possible to implement a 15 minutes line through the center of Magnolia.

- » **Thank you for your comment. The comment is noted.**

I'm really excited to see that these changes are being considered. I'm really looking forward to build a DADU in my backyard. I will then be able to move into it while I remodel my main house to add an ADU in the basement. I think that this is the right thing to do for the city and that this is a gentle way to increase density without impacting the charm of the city.

- » **Thank you for your comment. The comment is noted.**

I'm a strong supporter of Alternative 2. It seems to provide the most options and makes it the most likely that ADUs will be built. As a property owner looking forward to start my Backyard cotage project, this would definitely enable me to execute on my vision with minimal barriers. I would also expect that Illegal

ADU would be less common under these new rules. A couple of things that I would change would be, first take from Alternative 3 regarding the number of ADUs. You can either have 2 AADU or one AADU and one DADU.

» **Thank you for your comment. The comment is noted.**

Nothing surprising here this is bound to happen with bigger structures that are required in order to increase density. I think all options are acceptable for this section.

» **Thank you for your comment. The comment is noted.**

As a owner of a Parcel D in a Higher price neighborhood, Option 2 incentivizes me to do the "right" thing by creating the most hosing and help control price increase while generating good rental income.

» **Thank you for your comment. The comment is noted.**

No comment here except for the fact that DADU should be able to use the same sewer line and water supply line as the main house.

» **Thank you for your comment. The comment is noted.**

I was mostly interested by the tree canopy question here. I think that there should more incentive to either plant more/replace trees that have to be removed for the construction of DADU. I would also like to see more incentive for green roofs. Maybe provide a slightly larger coverage for a verified green roof.

» **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

## Anonymous 107

Option 2 - Removes the barrier for owner-occupancy properties to create an ADU on their property can provide more affordable housing.

» **Thank you for your comment. The comment is noted.**

I supports option 2

» **Thank you for your comment. The comment is noted.**

Lift this regulation will provide more affordable housing.

» **Thank you for your comment. The comment is noted.**

## Anonymous 108

We need RPZ along the entire C-Line, as non-residents park in front of our buildings and older homes (without adequate indoor parking), and clog up the streets as much as five blocks in either direction.

» **The proposal evaluated in this EIS concerns proposed changes to the Land Use Code for the construction of ADUs. Implementation of specific Residential Parking Zones (RPZs) is not considered as part of the proposed Land Use Code changes and is outside the scope of this proposal.**

## Anonymous 109

The city should adopt Alternative 2, with no owner occupancy requirement. Currently, Seattle has lots of single-family houses that are rented out whole. Obviously, there is no owner living on site at these rentals. This hasn't been a problem. The owner occupancy requirement addresses a problem that does not exist.

» **Thank you for your comment. The comment is noted.**

In most cases, requiring an off-street parking space will require an additional curb cut. This is undesirable because having more cars driving across the sidewalk impairs the walking environment. Furthermore, the extra curb cut usually eliminates one on-street parking space, so there is often no actual increase in parking. I urge the city to adopt Alternative 2 in order to avoid this outcome.

» **Thank you for your comment. The comment is noted.**

My name is David Thaler. I am a renter in the Montlake area. In the last 6 years, my rent has increased about 63%, but my income has not gone up anywhere near as much. We need more housing in Seattle and that need is urgent. The need for more housing should take priority over other considerations (parking, etc.), because the current housing shortage and the resulting rent increase is impoverishing the working class and driving much of the increase in homelessness. The city should adopt Alternative 2 because it will produce the most additional housing.

» **Thank you for your comment. The comment is noted.**

We really need more housing

» **Thank you for your comment. The comment is noted.**

Seriously, more housing. No time for aesthetics when hundreds of seattleites are homeless.

» **Thank you for your comment. The comment is noted.**

Most of the city is single family zoning. This could bring more density to those areas.

» **Thank you for your comment. The comment is noted.**

No more parking.

» **Thank you for your comment. The comment is noted.**

## Anonymous 110

The City should provide incentives, like property tax exemptions, to homeowners to encourage them to build ADUs and DADUs.

» **Thank you for your comment. The comment is noted.**

## Anonymous 111

Allowing dormers just makes sense. Approved in both alternatives.

» **Thank you for your comment. The comment is noted.**

19% of existing detached one-unit structures are already renter occupied? Why should a DADU/AADU require the owner live there for 6 months? What type of owner is this geared towards that would have the option to live elsewhere for half the year, maybe say when it's cold?

» **Thank you for your comment. The comment is noted.**

Alternative 2 is built to fail. Therefore, I hope for the progression of diversifying away from single-family zoning, an increase in ADUs is a practical first step. I am in favor of either Alternative 2 or 3. Both will take that step.

» **Thank you for your comment. The comment is noted.**

33% of single-family homes are currently in plots smaller than the minimum sized for SF5000, which prohibits subdivision of existing large lots. Minimum size for proposed ADU is for lots of 3,200sqft. Why not make a zoning for SF3200?

» **The proposal evaluated in the EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding subdivisions and minimum lot size requirements for single-family zones are outside the scope of this proposal.**

"Your answer" as the type field is directed as provoking the commentor to come up with the solution. "Your comments" would be more apt when requesting public comment. Similarly, your graphic at the header shows these box homes indicating that's what the neighborhood will look like with an AADU/DADU. Beauty of these construction is that they would be geared towards existing properties. Another slight design cue against the proposed alternatives 2 & 3 provided in this study.

» **Thank you for your comment. The comment is noted.**

Alternate option in lieu of parking space could be covered bike storage. Rather than the city tax ADU creation, why not subsidize Orca Cards for ADU renters? If decreasing cars is the desire, increasing public transportation usage will help provide an alternative.

» **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative would eliminate the off-street parking requirement for ADUs.**

## Anonymous 112

Cars are reality, so too our buses walking, and light rail. All need to be considered and to some extent supported. Option 3 represents best plan for this necessary diversity.

» **Thank you for your comment. The comment is noted.**

I support option 3 or it's capacity to increase the housing stock in a manner that is closer to being sustainable by our existing infrastructure, and attend to significant issues regarding livability for those already in these neighborhoods and those who wish to join them

» **Thank you for your comment. The comment is noted.**

Serious attention needs to be paid to the issue of tree canopy and global warming warming. It astounds me that up till now the city's government appears to be paying very little attention to either issue. Trees can't speak, but our children can and we'll have a lot to say if our city government continues it's hypocritical course.

» **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

### Anonymous 113

Please relax parking requirements.

- » **Thank you for your comment. The comment is noted.**

Adu's are small so the scale is not an issue. New mega houses are the opposite.

- » **Thank you for your comment. The comment is noted.**

Higher density please.

- » **Thank you for your comment. The comment is noted.**

More housing options please.

- » **Thank you for your comment. The comment is noted.**

Please go with option 2

- » **Thank you for your comment. The comment is noted.**

Not applicable

- » **Thank you for your comment. The comment is noted.**

### Anonymous 114

Overcrowded lots are not appealing. They look overcrowded. It feels claustrophobic. There is no parking and apparently you will not mandate enough provided parking.

Why does the City Council allow oversized mega-homes to be built after an average or small house is torn down, dwarfing and darkening the homes around it?

This is okay, but I cannot live peacefully in my single family home??? The destruction of traditional northwest homes for the mega-box monstrosity is what you should focus on.

No one needs this sort of space unless they have a large family. Just because someone has money, it should not exempt them from responsible land use.

Why you want me to live crowded in around multiple other homes while you allow this sort of egregious and excessive hogging of land for the sake of being decadent, is beyond me.

Can you please explain this?

The quality and character of Seattle neighborhoods, which have defined our city, is being eroded, and all you want to do is cram more houses in?

Why not halt the destruction of scaled duplexes and triplexes, which the average person can afford, and allow lower and middle income Seattleites the ability to continue living in their homes?

Halt the destruction of average size home for mega-homes. Take care of the average person instead of the rich, you are chasing around with your tongue hanging out.

- » **Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes a floor area ratio (FAR) limit that would limit the size of new single-family homes.**

I am opposed to these actions.

Regulatory barriers were placed for a reason. Making these changes removes safeguards for keeping our neighborhoods as they were designed, SINGLE FAMILY HOUSING. This is what I worked hard for a paid for and chose to live in 24 years ago.

I do not like the presumption of the City COuncil that they can impose something different upon me.

Instead control growth and deal with our current issues related to rapid growth.

You have already shown yourself incompetent and unwilling to listen to citizens you serve.

» **Thank you for your comment. The comment is noted.**

I don't want these ridiculous home values that tax long standing homeowners out of their homes so newcomers can crowd us out.

I am born and raised here and am tired of being treated like a second class citizen.

There is a definite feeling of hostility towards Seattle natives and those of us over 40.

Age discrimination is a real concern.

» **Thank you for your comment. The comment is noted.**

I like my large lot and enjoy it immensely.

I worked for it and paid for it.

I did not work for and pay for overcrowded neighborhoods and no parking.

I am tired of the City Council, who gladly and aggressively collects my tax dollars, to then guilt me into thinking I don't have a right to live in the city I grew up in, in some level of comfort, able to move about freely and park my car.

» **Thank you for your comment. The comment is noted.**

Once again, deal with the current deficits in service and then consider making things worse. There has been no actions by the Seattle City Council that have proven you are worthy of trust, increased funding or any other major decision making responsibilities. Listen to your constituents and quit forcing your personal agendas down the citizens of Seattle's throats.

» **Thank you for your comment. The comment is noted.**

What you have done to parking in my city is ridiculous. There is no decrease in car ownership and usage. According to studies the only group using more transit is under 40 year olds.

So now you can add age discrimination. to your list of blunders. You should respect those of us who drive, pretty much everyone. Road diets and eliminating parking haven't stopped people from driving. Mass transit is grossly inadequate.

Instead of improving it you have simply chosen to change the definition of buses being timely, etc.

Despicable. You should be ashamed.

So rather than creating traffic problems where we idle cars for prolonged periods of time, why not improve traffic flow and get people moving. And stop blowing exorbitant amounts of money on bike lanes, sharrows and the like. This farce has been exposed and blown wide open. For the small minority who do ride bikes, there are plenty of bike lanes. Stop now!

- » **Please see the frequent comment response concerning impacts to parking.**

### Anonymous 115

I prefer Alternative 2 or Alternative 3. I think they both strike a balance between those that prefer to keep their neighborhoods as is and those that to be part of increasing the housing supply. I particularly like that single family homeowners can be part of adding to the housing supply and get the revenue from doing so. I have been following what has happened with Portland ADUs and what is happening with California ADUs, and most of that appears to be quite positive.

- » **Thank you for your comment. The comment is noted.**

It seems logical that increasing the supply of ADUs will create more naturally affordable housing. It may take a few years for this to happen. In particular, it may take a few years for ADU design & construction itself to become affordable and for credit unions to create the loan products that finance ADU construction.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 116

I strongly support reducing and eliminating parking requirements. The City is building light rail and bike lanes. Making new housing contingent on additional parking spaces doesn't make sense in a densifying city with increasing transit options.

- » **Thank you for your comment. The comment is noted.**

Accessory dwelling units are desperately needed in Seattle to provide more housing and also more ways for people to afford to own a home. I support reducing restrictions and eliminating hurdles to DADU and ADU construction.

- » **Thank you for your comment. The comment is noted.**

I strongly support Alternative 2. That option does the most to increase flexibility. I know from experience that current standards only allow the development of extremely small living units, and that if they are units on 2 stories they are forced to have very low ceiling heights. I applaud the changes that would allow slightly larger sizes with slightly higher ceilings. This is critical for supporting long term residence and multi-generational living. I also appreciate the reduction in parking requirements. With light rail expanding through our city it makes sense to reduce

parking requirements. Streamlining permitting would also take a major hurdle out of the process, and facilitate building more permits faster. I also applaud the move to allow both a DADU and an ADU on the same site, and eliminate the owner occupancy requirement. Allowing more units to be built in single family neighborhoods is a way to increase density while also reducing the economic incentive to tear down older small houses that give neighborhoods their charm.

» **Thank you for your comment. The comment is noted.**

ADU's and DADU's are greatly needed to increase density in Seattle's single family neighborhoods and improve affordability. They can also be a way to keep families together through multi-generational living. I strongly support Alternative 2 because it does the most to increase design flexibility and reduce permitting hurdles for accessory dwelling units. In the future I would like to see even larger DADU's allowed. In SF 7000 areas of the city larger backyard cottages would make a lot of sense and do even more to improve housing affordability by making small homes that could be large enough for more types of renters.

» **Thank you for your comment. The comment is noted.**

I strongly support Alternative 2 because it does the most to allow increased density in single family zones. We have a crisis of affordability in Seattle, and the only way to solve it is to construct more housing. ADU's and DADU's are comparatively inexpensive to construct, and do not require demolishing charming older homes. I applaud the City's efforts to reduce hurdles to constructing as many accessory dwelling units as possible.

» **Thank you for your comment. The comment is noted.**

I strongly support Alternative 2. DADU's and ADU's have very little impact on neighborhood aesthetics while at the same time allowing more housing on existing single family lots. This reduces the economic incentive to tear down older homes and build tall grey boxes, and means that the charming character of our single family neighborhoods can be retained while also increasing density.

» **Thank you for your comment. The comment is noted.**

## Anonymous 117

I oppose the proposed changes which I feel will further erode Seattle's single family neighborhoods. Density should be placed in discrete places and not spread all over Seattle. Single family neighborhoods are part of the fabric of Seattle and need to be preserved, rather than turning every 'neighborhood' into condo-ville.

» **Thank you for your comment. The comment is noted.**

The council is out of touch with the people who live in the city.

» **Thank you for your comment. The comment is noted.**

In our neighborhood there are already insufficient parking places for the people that live in the existing homes. Adding multiple new residents will make it impossible for existing residents to park anywhere near their home. It's not

possible to mandate that people living in new ADUs not own cars so the policy proposed will create a lot of tension between new residents and old residents. In addition, it's already hard to drive on some streets when cars are parked wall to wall; the streets are so narrow one has to back up to the last intersection if someone comes in your direction. That's not particularly safe or pleasant. There is public transportation though not super close. How do we convince the new tenants that they are the ones who must use it?

» **Thank you for your comment. The comment is noted.**

### Anonymous 118

I strongly urge there to be NO requiring parking for ADUs -- requiring parking means we're privileging space for cars over housing for people. Fewer people are choosing to have cars in the city (including our family!) and giving so much free space to cars means that we're building less housing, having fewer sidewalks and bike lanes, and encouraging the use of fossil fuels that are devastating the climate. It's time to start thinking about how we move people, not cars. Please remove all off-street parking requirements!

» **Thank you for your comment. The comment is noted.**

It would be fantastic if the city could incentivize affordable rentals by eliminating development charges when owners commit to holding them as rentals affordable to people making under 60% AMI for 15 years.

» **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

I believe that the minimum lot size for DADUs and ADUs should be decreased to 2500 square feet. Other land use requirements will constrain lot coverage and ensure enough open space. There are more sub-divided lots in the city and every lot should have the opportunity to add an DADU or ADU!

I also think the city should incentivize green building standards like passivhaus and "living buildings" by eliminating development charges on any units built to those standards.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see Chapter 2, Alternatives, for a discussion of the Preferred Alternative, which would allow additional height for DADUs that incorporate green building standards.**

### Anonymous 119

I support no parking requirements

» **Thank you for your comment. The comment is noted.**

I support alternative 3, triplex buildings are a great way to add density to single family zones

» **Thank you for your comment. The comment is noted.**

Many single family zones are in areas of the city with access to better schools, parks, and other amenities. Providing more rental units will open these areas to people of more diverse socioeconomic backgrounds

» **Thank you for your comment. The comment is noted.**

## Anonymous 120

As the report shows, parking impact will be very minimal.

» **Thank you for your comment. The comment is noted.**

I believe increasing housing options will be a benefit to both owners and tenants.

» **Thank you for your comment. The comment is noted.**

I support the loosening of regulations on building DADUs/ADUs. I think the population will benefit and impact will be mostly positive.

» **Thank you for your comment. The comment is noted.**

I think the impact in this regard will not be a detriment to SF zones.

» **Thank you for your comment. The comment is noted.**

Objections to this are overblown. There already exists a wide variety of styles and sizes of housing in SF zones. Adding DADU/ADUs would not impact this.

» **Thank you for your comment. The comment is noted.**

The number of additional units we're talking about is pretty small in the grand scheme of utilities at a city level.

» **Thank you for your comment. The comment is noted.**

## Anonymous 121

I am in favor of the most flexible possible option. We need fewer barriers and more ADUs.

» **Thank you for your comment. The comment is noted.**

## Anonymous 122

With 77 people moving to the city each day, many of them are also bringing cars. We currently live in a rental where finding a parking spot 3 blocks away is a miracle... and we don't even live in a dense part of Seattle like Capitol Hill, Ballard, etc. We support commuting initiatives also, but people still have their

cars and spaces are being removed, car lanes are being removed, and it just adds to the congestion.

» **Thank you for your comment. The comment is noted.**

I strongly prefer option 2. As a Seattle resident, married, in my mid-30s it's nearly impossible to afford a home with an modest salary. We've tried to purchase a home and had 7 offers not be up to snuff. Allowing home owners to add ADU's would help us find more affordable living options to rent.

» **Thank you for your comment. The comment is noted.**

### Anonymous 123

its a very small start.

» **Thank you for your comment. The comment is noted.**

good start

» **Thank you for your comment. The comment is noted.**

Need to get rid of rpz's.

» **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Removal of Residential Parking Zones (RPZs) is not considered as part of the proposed Land Use Code changes and is outside the scope of the EIS.**

### Anonymous 124

Solid work that you should be proud of. It's a shame that we, as a city in crisis, have been forced to waste this time and effort on unnecessary analysis by those who feel that their desire to freeze a neighborhood in nostalgia is more important than other people having affordable housing options.

» **Thank you for your comment. The comment is noted.**

I support any alternative that better enables rapid development of ADU/ DADUs across the city. Elimination of antiquated/misguided restrictions like minimum parking requirements, height restrictions, minimum lot size, and owner occupancy should be prioritized to increase the range of potential sites for development. We're in the middle of a housing crisis, we should act like it. Of the current proposals, Alternative 2 achieves this best.

» **Thank you for your comment. The comment is noted.**

Anyone concerned about the aesthetic impact of small backyard cottages should instead be worried about the aesthetics of the immediate indignity of a society that forces people into homelessness and the long-term disaster of rising sea-levels eventually reclaiming the land.

» **Thank you for your comment. The comment is noted.**

While we're talking land use, look into scaling back the primacy of single-family zoning that limits housing options, inhibits transit deployment, and reinforces class/race inequities.

» **Thank you for your comment. The comment is noted.**

Housing people is more important than the free or discounted storage of private vehicles on public lands.

» **Thank you for your comment. The comment is noted.**

## Anonymous 125

I support Alternative 2 as the most viable option for the new regulations. This allows homeowners to feel that they can undertake an ADU/DADU project without difficult new hurdles to surmount (thus potentially REDUCING the addition of these types of units). This will also allow renters to find more options for housing in neighborhoods that are quieter and offer suitable homes for a variety of lifestyle/family makeups.

» **Thank you for your comment. The comment is noted.**

I support Alternative 2 as the most viable option for the new regulations. Alternative 1 (no change) does not solve our housing and best use of land in any real and immediate way. And Alternative 3, while removing some barriers, creates new ones that would discourage homeowners from pursuing the development of ADU/DADUs. Alternative 2 creates opportunity for homeowners and future renters of these units to fill in housing gaps on underutilized SFR land. Density needs to increase, and not just in the higher density MFR zones. Large areas occupied by SF zoning can only be sustainable in a growing city if the uses on those properties are densified.

» **Thank you for your comment. The comment is noted.**

I support Alternative 2 as the most viable option for the new regulations, as it provides a reasonable threshold for homeowners and greatest immediate options for renters.

» **Thank you for your comment. The comment is noted.**

Typo on page 4-28: First full paragraph, first sentence should read 2018-2027.

» **Thank you for notifying us of this error. It is corrected in this Final EIS.**

## Anonymous 126

agree with proposal to allow ADU's to use on street parking - eliminating requirement for off street parking. Off street requirement was too burdensome and would limit the amount of ADU's

» **Thank you for your comment. The comment is noted.**

Would love to move this through quickly - option #2 seems best

» **Thank you for your comment. The comment is noted.**

Agree with changes outlined in Alternative #2 - please move forward with these changes

» **Thank you for your comment. The comment is noted.**

I am not concerned about the current outlined # of increase impacting

» **Thank you for your comment. The comment is noted.**

I have no concerns regarding aesthetics with outlined proposal

» **Thank you for your comment. The comment is noted.**

Prefer ADU/DADU density to large apartment buildings. The apartment buildings are having a bigger impact of fabric of neighborhood, especially the Roosevelt, Eastlake corridor

» **Thank you for your comment. The comment is noted.**

Prefer option of ADU/DADU to generate more affordable housing than giant apartment buildings appearing in my neighborhood.

» **Thank you for your comment. The comment is noted.**

### Anonymous 127

Alternative 1 concerns me - I think tearing down existing homes and building huge mansions on the lots does more to ruin the character of the neighborhood than increased density.

» **Thank you for your comment. The comment is noted.**

I do not care about parking. People should be nudged to use public transportation anyway - this includes current homeowners.

» **Thank you for your comment. The comment is noted.**

I support Alternative 2, or anything that would increase density. I do not care about off-street parking requirements

» **Thank you for your comment. The comment is noted.**

### Anonymous 128

Neighborhoods without parking are lousy to live in for everyone over the age of 25. While a car-free city is a worthy goal, I can count on one hand the number of adults I know who don't own cars. Most of my coworkers, friends, and family want to own a car, and they want to park it at home. And your EIS is dead wrong, there will be a huge impact, and in most city neighborhoods, if you do this, there will be no parking.

» **Please see the frequent comment response concerning impacts to parking.**

Allowing DADUs that are of the same scale or larger than the existing houses changes the entire feel of a neighborhood. Rarely do the DADUs match the style of the neighborhood; they often are hulking, modern boxes, maximizing the volume of space on the smallest footprint. And this is not how Seattle's single-family neighborhoods were built. Because the DADUs are intermittent, chaotic, and variable in design, it creates a feeling of a packed shantytown.

Further, the loosening of rules will decimate what remains of our tree canopy. Seattle will be hotter, drier, dirtier, and uglier, simply because big trees are an integral part of our city's identity, and packing density only allows little trees. Big trees will get felled to allow construction, or they will go in a year or two when their branches, needles and root swells are incompatible with packed-in housing.

» **Please see the frequent comment response concerning impacts on tree canopy.**

Don't add any more density to Seattle's single family neighborhoods. The people living there want to live in a single-family neighborhood, which is why they bought their house in the first place. And it's their neighborhood--they live there, so they should get to decide how it grows, if at all.

» **Thank you for your comment. The comment is noted.**

Most residential Seattleites resist neighborhood character change, push back against upzoning, and flat-out hate HALA because they don't want our city government to do things like this. And, this is a sneaky way to get around traditional density increases.

» **Thank you for your comment. The comment is noted.**

Single-family residents are being pushed and crushed on all sides. They want to live in real neighborhoods, not packed-in and crushed in vertically and horizontally.

This proposed change is a zoning workaround, to try and undermine the will of the silent majority of people in Seattle, who don't want density or upzoning --or, underhanded urban planner tricks--worked upon their neighborhoods. Concentrate density downtown, so people who want urban culture can enjoy urban culture. Allow people who want quiet, family-friendly, green neighborhoods, and have paid for many years to have them, to keep their neighborhood the way they are.

Remember, the neighborhood is theirs--not yours. "Urban planners" don't have to live with the effects of the changes they are making, and those of us on the ground--we do.

» **Thank you for your comment. The comment is noted.**

Removing the residency requirement will make these house simply rental fodder for REITs and big investors. These investors pepper Seattle with offers all the time. Single family residences are the underlying foundation for America's middle class, and the reduction in home ownership that comes from changes like this is a huge transfer of wealth from everyday citizens to the rich. Additionally, neighborhoods without resident owners are very different than those with a preponderance of renters. They are less attractive to long-term, family, and stable residents, are louder, and have more petty crime. And most people I know that want to live in Seattle's single-family neighborhoods don't want to live in a neighborhood that is mostly renters.

We lived in Fremont before it went to L2. It was fun, safe, clean, with good neighbors that we knew. Our kids could walk around the yard safely. But we couldn't raise a family there after it changed, and had to move. Where? to another single family neighborhood, of course. One with less property crime, nighttime gunshots, drunk people vomiting in our bushes, garbage on the streets, people alternately speeding and gridlocked--and one where the police actually show up when you call. The difference? Our new neighborhood had fewer people, and they were many more owners than renters.

» **Thank you for your comment. The comment is noted.**

There is no future scenario where utility costs are eased for Seattle residents, and I don't see this being any help.

» **Thank you for your comment. The comment is noted.**

### Anonymous 129

I am greatly concerned about the proposal to eliminate the requirement that the owner of the property (or a family member) be a resident of the property on which the ADU is proposed to be built. Elimination of the owner-resident requirement will result in speculators and real estate investment funds buying properties with the sole purpose of maximizing their investment. This will further fan the flame of rising home prices, particularly, I think, in Seattle's more affordable neighborhoods. Since the stated intent of this proposed measure is to increase affordability in the City, opening the door to non-resident investors would be a grave mistake.

By all means make it easier and more affordable for homeowners to build well designed backyard cottages, with or without parking. But don't turn Seattle's neighborhoods into a battleground between Seattle families and real estate investment trusts. We all know who will come out the loser in that fight.

- » **Please refer to Section 4.1, Housing and Socioeconomics.**

### Anonymous 130

You should not require additional parking. Additional parking spaces raise the cost and encourage driving. Removal of off street parking should be rewarded.

- » **Thank you for your comment. The comment is noted.**

Upzone everything.

- » **Thank you for your comment. The comment is noted.**

Composting toilet systems should be allowed for reduction of water use.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to the plumbing code are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

### Anonymous 131

Finally a step toward letting homeowners find a ways to pay increased property taxes

- » **Thank you for your comment. The comment is noted.**

### Anonymous 132

I am not a supporter of more density, I would support the no action alternative

- » **Thank you for your comment. The comment is noted.**

I am opposed to changes in the current codes the would allow more housing on residential property.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 133

Seattle has to allow more housing. Alternative 2 does this best.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is the best.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 134

Make it easier to build them, the city really needs extra units

- » **Thank you for your comment. The comment is noted.**

Cities are pretty because of density and shops and people, not because of trees-  
-but still, we have plenty of space for trees

- » **Thank you for your comment. The comment is noted.**

### Anonymous 135

I'm 100% in favor of increasing the variety and # of housing types available in Seattle. Every neighborhood needs more places to live, fewer free places to park and more transit. Anything the city can do to allow homeowners and developers to increase the # of places to live is good. NIMBY fears are BS, please ignore them.

- » **Thank you for your comment. The comment is noted.**

### Anonymous 136

I think these units are an attractive and unique design and contribute variety and aesthetically pleasing variation to the urban landscape. These units create a more human scaled landscape and create facades that are sized for the human form.

- » **Thank you for your comment. The comment is noted.**

I support Alternative 2 and the overall construction of ADUs and DADUs. I do not believe there should be off-street parking requirements for those living in the units.

- » **Thank you for your comment. The comment is noted.**

I believe that ADU and DADUs are an excellent response to the demand of our growing city and provide equitable housing options to people who otherwise would not be able to live in the city where they work. Not providing a variety of options for citizens will increase vehicle miles traveled which also increases pollution, decreases road safety, and decreases quality of life.

- » **Thank you for your comment. The comment is noted.**

Yay ADUs!!!!!!!

- » **Thank you for your comment. The comment is noted.**

I believe that there should not be any parking requirements for housing, especially related to these units. Transit should be prioritized throughout the city

which includes the neighborhoods where these units would be located. The point of increasing housing is to make the city more accessible and available to a wider group of people, so transit should be provided to improve access to their jobs to simulate the economy. The parking analysis showed no serious impacts due to any of the alternatives proposed, so adding parking requirements is going to induce demand and negatively impact congestion, the environment, and quality of life.

» **Thank you for your comment. The comment is noted.**

Public services and utilities are exactly what the name implies. They are services to the public and those who pay taxes to the city that they live in with the expectation that they are receiving basic services. These units are housing citizens of Seattle and are deserving of the same benefits and levels of service as homeowners.

» **Thank you for your comment. The comment is noted.**

### Anonymous 137

I believe that this will effect small lots adding sometime massive, bulky homes while distracting from the character of our established neighborhood and your fellow neighbors

» **Thank you for your comment. The comment is noted.**

Agree with City makes no changes Alternative 1

» **Thank you for your comment. The comment is noted.**

Do not agree

» **Thank you for your comment. The comment is noted.**

Permitting in my experience is always understaffed and has a difficult time keeping up with growth and onsite inspections as it is. The current zoning regulations and rules need to be changed and updated to avoid over development not just for ADU

» **Thank you for your comment. The comment is noted.**

I am opposed to this whole concept it is not for us as home owners to be the ones to solve the growth and development of the City in the end this would add monthly financial gain to the homeowner however, more financial benefit for the City in the end

» **Thank you for your comment. The comment is noted.**

This would only add excessive traffic within the residential core while not making a compatible neighborhood and being able to actually park in your neighborhood and at the same time the City has not been able to maintain proper transportation to vital communities already. I strongly believe this will cause our neighborhoods to become over developed, excessive traffic within the residential core and unable to maintain residential character and making not making a compatible neighborhood.

» **Thank you for your comment. The comment is noted.**

This will cause other issues needed by the city such as sidewalks, crosswalks, stop signs etc.

» **Thank you for your comment. The comment is noted.**

## 5.5 Responses to Form Letters and Petitions

A number of commenters submitted the same form letter or signed onto a petition. We identify the names of people who submitted each form letter or signed a petition and then provide a single response to each.

### FORM LETTER SUBMITTED BY EMAIL

**Exhibit 5-4** Commenters Who Submitted a Form Letter

Commenter
Adams, Marsha
Altamirano, Yolanda
Anderson, Anthony
Antman, Iris
Armstrong, Rep. Seth
Arvidson, Heather
ashton, lynne
Baker, PhD, Norman
Berg, Ericka
Berkelhammer, Jessi
Berlin, Sue
Besmer, Kelly
Betz-Zall, Rosy
Bhikkhu, Nuntiyo
Bishop, Tarun
Bowers, Joan
Bradford, Nicole
Brendler, Stefanie
Briggs, Geoff
Brotherton, Carolyn
Buckley, Christopher
Bush, Veronica

<b>Commenter</b>
<b>Buttry, Corey</b>
<b>Campbell, Liz</b>
<b>Card, Jesse</b>
<b>Cawley, Curtis</b>
<b>Chapman, Ben</b>
<b>Chase, Jayne</b>
<b>Chippendale, Art</b>
<b>Christensen, David</b>
<b>cochran, deirdre</b>
<b>cohen, judith</b>
<b>corr, nancy</b>
<b>Costamagna, Marilyn</b>
<b>Crimmins, Nancy</b>
<b>Danford Hirsch, Barbara</b>
<b>Darsie, Jean</b>
<b>Denning, Asphodel</b>
<b>Dowson, Eleanor</b>
<b>Ehrlich, Isaac</b>
<b>Eiger, Cheryl</b>
<b>Elder, Heather</b>
<b>Ellis, Jan</b>
<b>Feldman, Sheryl</b>
<b>Fenstemake, Lois</b>
<b>ferrara, kathleen</b>
<b>Fine, Kelly</b>
<b>Fosburgh, Eric</b>
<b>Gallagher, Kevin</b>
<b>Gannon, Vicky</b>
<b>Gillis, Marian</b>
<b>Gish, Edith</b>
<b>Godfrey, Jennifer</b>

<b>Commenter</b>
Goldwarg, Jordan
Gonzales, Mikhaila
Grantier, Clara
Haase, Debra
Harlan, Rick
Harmell, Jack
Herbig, Eric
Hildebrand, Nate
Hoff, Michelle
Howe, Jared
Hughes, Kevin
Humphreys, Anna
Jacobson, Bonnie
Johnson, Alyssa
Johnson, Emma
Johnston, Lloyd
Jones, Clayton
Kauffman, Katherine
Kavage, Sarah
Klein, Leah
Knapp, Dee
Knudsen, Constance
Kretchmer, Andrea
Lafferty, carrie
Lamb, Barbara
Lang, Tom
LaRue, Erik
Liberge, Marcel
Liebermann, Jerry
Lindeke, Lianne
Locascio, Gillian

<b>Commenter</b>
<b>Loe Bernstein, Laura</b>
<b>Loewenstein, Jenny</b>
<b>Louchard, Ed</b>
<b>Low, Sammy</b>
<b>Manderville, Bartholda</b>
<b>Mar, Nora</b>
<b>Markley, Shannon</b>
<b>Martinson, Julianne</b>
<b>Mascall, Nel</b>
<b>Mathews, Holger</b>
<b>Mcgavin, Alora</b>
<b>McLaughlin, Emily</b>
<b>Mermelstein, Jon</b>
<b>Michaels, Melissa</b>
<b>Michel, Morgan</b>
<b>Miknaitis, Gajus</b>
<b>milller, bruce</b>
<b>Miller, Travis</b>
<b>montacute, merv</b>
<b>Montacute, Susan</b>
<b>Moore, Janet</b>
<b>Morgan, Anne</b>
<b>Morrison, Debra</b>
<b>Mouton, Alexander</b>
<b>Murphy, Kyle</b>
<b>Murti, Deven</b>
<b>Nachman, Roger</b>
<b>Neuwald Falcon, Ruth</b>
<b>Newman-Henson, Bridgid Persephone</b>
<b>Nuess, Tegra</b>
<b>Oaks, Stacy</b>

<b>Commenter</b>
<b>Olsheskie-Gray, Andrea</b>
<b>Olson, Chris</b>
<b>Pan, Michael</b>
<b>Pantastico, Hoa</b>
<b>Parker, Deborah</b>
<b>Parsley, Adina</b>
<b>Pavcovich, Michelle</b>
<b>Perfrement, Eileen</b>
<b>Perkins, Sherry L</b>
<b>Peterson, Katrina</b>
<b>Pezely, Rob</b>
<b>Phillips, Ruby</b>
<b>Phinney, Barbara</b>
<b>Ploger, James</b>
<b>Pollock, Thomas</b>
<b>Portney, Miriam</b>
<b>Post, Heather</b>
<b>Powell, Emily</b>
<b>Prentice, Selden</b>
<b>Ramos, Miguel</b>
<b>Rasmussen, Erin</b>
<b>Reep, Irene</b>
<b>reuter, lacey</b>
<b>Robison, David</b>
<b>Ruffin, Sandy</b>
<b>Scheer, David</b>
<b>Scheer, David</b>
<b>Scott-Thoennes, Eliana</b>
<b>Seguel, Leopoldo</b>
<b>Shelton, Anita</b>
<b>Shimeall, Nancy</b>

<b>Commenter</b>
Shisk, Diane
slocum, jean
Smith, Clayton
Smith, Daniel
Smith, Sandra
Southwell, Nicole
Stack, Megan
STIFFLER, TONYA L
Stinson, Greg
Stoller, Elliot
Stroud, Lucinda
Syracopoulos, Thalia
Tam-Claiborne, Daniel
Tarbutton, Don
Thomas, Elissa
Thompesen, Linda S
Thomsen, Don
Tkachuck, Candace
Tollefson, Todd
Tozzi, Lauren
Tracy, Jake
Traff, susan
trospen, michelle
Tucker, Roger
Van Voast, Jordan
Vergara, Laura
Voli, Carlo
Wallach, Jessica
Weaver, Stefanie
West, Rusty & Candice
Wheeler, Gilda

<b>Commenter</b>
<b>Wilson-Briggs, Rosie</b>
<b>Winters, Briar</b>
<b>Winters, Johnna</b>
<b>Wirth, Mark</b>
<b>Yang, Fanny</b>
<b>Yang, Huiling</b>
<b>Yogev, Yonit</b>
<b>Young, KC</b>
<b>Zygas, Kovas</b>

Exhibit 5-5 Form Letter Submitted by Email

Dear Ms. Pennucci and the Seattle City Council,  
With the affordable housing shortage Seattle is facing, I think that encouraging people to create more accessory dwelling units would go far to alleviate the issue.

**ADU's are a solution that everyone can love.** By increasing housing stock, they help keep rental prices down—and they provide flexibility for homeowners, who can leverage their positions to help defray their cost of living, while also providing housing for others. I strongly support additional housing, because want Seattle to be affordable, and households living in dense, transit-rich cities typically generate ¼ to ½ the climate-destroying CO<sub>2</sub> of those displaced to the suburbs. Neither of the existing “alternatives” maximizes the benefits and flexibility, though Alternative 2 is a good start. I strongly urge the following changes, but **only if they wouldn't trigger another round of EIS** (we can't afford the delay):

- **NO PARKING REQUIREMENT** because requiring parking for ADUs that means we're privileging space for cars over housing for people. 1
- **Lots should be allowed 2 ADU's and a DADU;** we want to encourage the subdivision of existing large houses, especially for empty-nesters. If someone has divorced or their kids have left home and they have space for a DADU and also a 2500 square foot house, it's good for everyone if they can do 2 ADU's as well as the DADU: it creates more affordable units, and allows people to stay in their own homes when circumstances change. See [this Portland study](#) about “internal conversions”. 2
- **Remove the owner-occupancy requirement;** it discriminates against renters and greatly disincentivizes building ADUs. Would you build and rent out a backyard cottage if you knew that its existence would block you from later moving out and renting your main house? Additionally, why shouldn't existing rental houses also be able to add ADUs? 3
- **Incentivize affordable rentals** by *eliminating* development charges for units when owners commit to holding them as rentals affordable to people making under 60% AMI for 15 years. 4
- **Incentivize green building standards** like passivhaus and “living buildings”, by eliminating development charges on any units built to those standards. 5
- **Incentivize rentals of more than one month** by lowering development charges for homeowners who commit to month-plus-long rentals for at least 10 years (to encourage rentals for residents, and not AirBNB units). 6
- **Streamline permitting by dedicating specialized reviewers to ADU/ DADU projects.** With just three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots or green roofs, residents who want to build an ADU have a clear and predictable pathway through permitting. 7
- **No MHA Fees.** MHA fees can add 15K+ to the cost of an ADU, thus making it less likely people will build them. Much better to *lower* costs on ADU's held affordable, as mentioned above. 8
- **Lower the minimum square footage for lots that can support DADU's and ADU's** to 2500. A 2500 sq. ft. lot can easily support a 2-story house with a footprint of 800 sq. ft. and an ADU inside, and also a DADU with a 400 sq. foot footprint. 9

We need to enable ADU's, not just allow them. These changes could make a big difference to how much affordable new housing gets built. 10

## RESPONSES TO FORM LETTER COMMENTS

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives. The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 3 Please also see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.
- 4 Please see Chapter 2, Alternatives. The Preferred Alternative would remove the owner occupancy requirement for ADUs.
- 5 Please see the Chapter 2, Alternatives, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 6 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative that includes allowing additional height for DADUs that incorporate green building features. Please also see the frequent comment responses regarding King County capacity charges and permit fees.
- 7 Please see the frequent comment responses regarding King County capacity charges and permit fees.
- 8 Please see the Chapter 2, Alternatives, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 9 Please see Chapter 2, Alternatives. The Preferred Alternative does not include an affordability requirement.
- 10 Please also see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.

## PETITION FROM THE MAGNOLIA COMMUNITY COUNCIL

**Exhibit 5-6** Commenters Who Signed the Magnolia  
Community Council Petition

<b>Commenter</b>
Allison, Craig
Alt, Deborah
Birk, Edyth
Bjorkland, Lori
Blums, Angela
Blums, Martin
Boswell, Natasha
Bothell, Linda
Broche, Golen
Brodie, John
Brooks, Christina
Brooks, Kevin
Bucher, James
Buildeschmitter, Sean
Butler, David
Carter, Bruce
Cook, Brian
Cooper, Laura
Cooper, Mark
Crippen, Pat
Dahlman, Carl
DeGrande, JoAnn
Derr, Denise
Diamasis, George
Eckels, Alison
Ellison, Richard
Field, Julia

<b>Commenter</b>
Fine, Phoebe
Fitzgibbons, Dawn
Fitzgibbons, Kerry
Fliegel, Joshua
Frankenburg, Carrie
Galpering, Luis
Gibbs, Judith
Green, Barbara Jo
Haledyne, Helen
Johnson, Gretchen
Kaserzik, David
Katzenberger, Jan
Kirk, Christopher
Kirsh, Andrew
LeVine, Sharon
Ley, Robin
Lipo, Patrick
Loesche, Patricia
Martin, Mellissa
Martinez, Anna
Martinez, Joel
McDuffie, Helen
McHugh, Michael
Moehring, David
Mount, Chris
Moylen, Patrick
Mullen, James
Munroe, John
Opeila, Tim
Parks, Valeria
Pelter, Tracy

<b>Commenter</b>
Poggi, Alice
Porter, Barry
Porter, Frederick
Porter, Heidi
Porter, Margaret
Price, Janice
Risser, David
Risser, Rebecca
Ross, Betsy
Ross, Charles
Ross, Julie
Rulifson, Brian
Sanders, Beth
Shearer, Wendy
Smith, Michael
Soukup, Jake
Stanishaw, Kristin
Studivant, Margaret
Suh, Katie
Sullivan, Joann
Swanberg, Irene
Thompson, Chase
Tollerson, Martin
Torrice, Albert
Vo, Tri
Watlers, Susan
Williamson, Bill
Wing, Lauren

Exhibit 5-7 Magnolia Community Council Petition

David Moehring, AIA  
Magnolia Community  
Council Board Member  
3444-B 23<sup>rd</sup> Ave W  
Seattle, WA 98199



Land Use Committee

of the Magnolia Community Council

Magnolia Community Council  
P.O. Box 99564  
Seattle, WA 98139-0564

May 31, 2018

**RE: THREE DWELLINGS ON SINGLE FAMILY LOTS  
Resulting in Local Climate Change Impacts proposed with City of  
Seattle's Accessory Dwelling Units Draft Environmental Impact Study**

Dear City of Seattle,

Seattle residents look to the City Council to assure growth with a blend of residential density AND urban forests. Seattle's focus is to avoid climate change, Mayor Burgess issued an Executive Order to strengthen tree protections; and Mayor Durkan publicly stated that one (density) size does not fit all communities. To the contrary, the proposed Accessory Dwelling Units Draft Environmental Impact Study (ADU DEIS) opposes these directions by:

- Eliminating housing diversity that exists with SF zones;
- Eliminating sufficient open space on private property for trees;
- Expanding Seattle's Climate-Changing Heat Islands citywide;
- Eliminating environments that support Seattle's Natural Habitats.

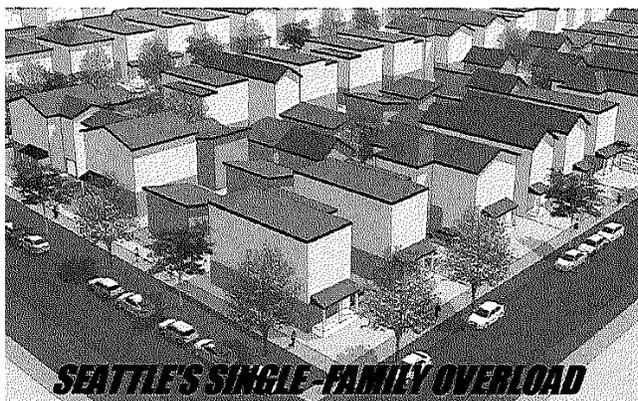


FIGURE 1- SEATTLE'S SINGLE-FAMILY ZONES AS RENDERED WITHIN THE DEIS FOR ADU

Please include these local climate change and natural habitat concerns any proposed changes to Seattle Accessory Dwelling Unit (ADU) legislation. Include in the ADU Study the alternative approach endorsed by 87 Seattle residents.

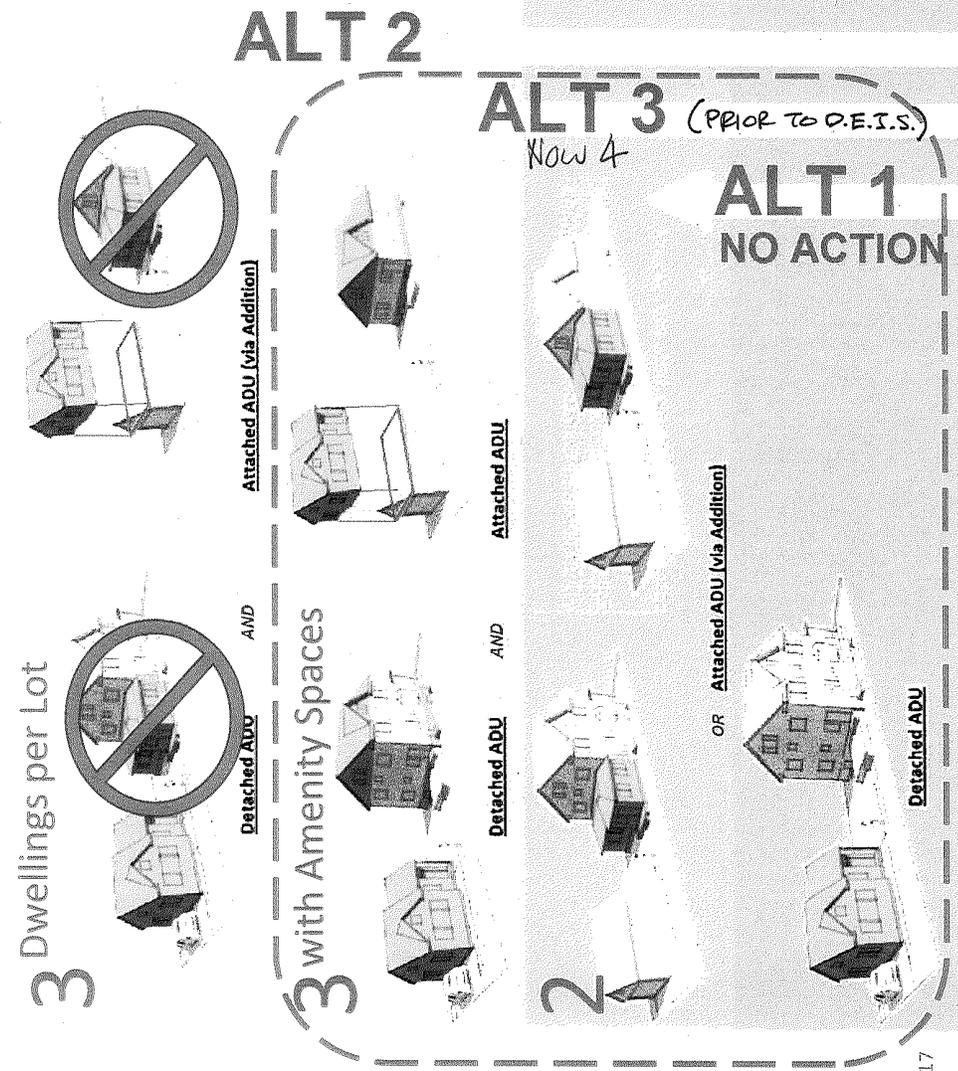
Sincerely,

David Moehring AIA NCARB, Architect  
Board Member, Magnolia Community Council and TreePAC

- ALT 2 includes both AADU and DADU in backyard
- Reduced green space and trees.
- No parking required
- Reduced privacy

*Community Proposed*  
 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.



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 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

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

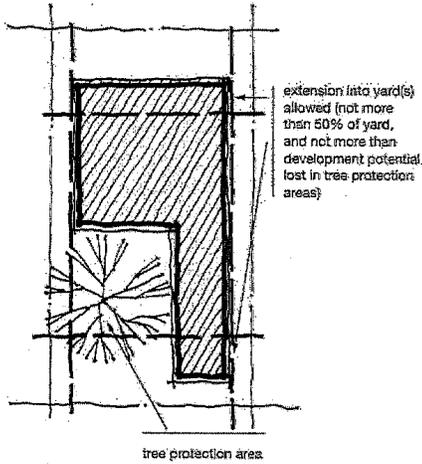
<b>Criteria (continued)</b>	<b>ALT 1 (No Change)</b>	<b>ALT 3</b>
<b>Rear Yard Coverage Limit</b>	40% of a rear yard can be covered by DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage limit.	Provide 150 SF of private amenity area for each 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

	<b>Alternative 1 (No Action)</b>	<b>Alternative 2</b>
<b>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>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.
<b>Owner occupancy</b>	Owner must occupy either the main house or the AADU/DADU for 6 months per year.	No requirement for an owner to occupy the house AADU or DADU.
<b>Minimum lot size for a DADU</b>	4,000 square feet	3,200 square feet
<b>Maximum square footage</b>	AADU: 1,000 square feet, including garage and storage areas. DADU: 600 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.
<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.
<b>Lot coverage limit</b>	25 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>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.
<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>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>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>MHA requirements</b>	Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.	
<b>Rental Registration &amp; Inspection Ordinance (RRIO)</b>	Property owners, including those 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/DFD/Publications/CAM/can242.pdf>

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

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- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

1 Name Pat Carroll Crippen Signature Pat Carroll  
Street Address 6811 Phinney Ave<sup>N</sup> or email patutiel@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:

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- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

2 Name CHRISTOPHER KIRK Signature Chris Kirk  
Street Address 1925 35th Ave W or email CHRIS@KIRKELL.COM  
Registered Seattle voter? (Circle One) Yes No Date 10/28/17

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- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

3 Name Vibekha Parks Signature Vibekha N. Parks  
Street Address 4335 32nd Ave W or email vibekhaparks@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).  
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4 Name Patrick + Nancy Maylan Signature NJ Maylan  
Street Address \_\_\_\_\_ or email nancy.j.wade@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).  
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5 Name Sean Buldeschewer Signature SB  
Street Address \_\_\_\_\_ or email \_\_\_\_\_  
Registered Seattle voter? (Circle One) Yes  No  Date 10/28/2017

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6 Name Michael Smith Signature Michael Smith  
Street Address 4321 31st Ave West or email \_\_\_\_\_  
Registered Seattle voter? (Circle One) Yes  No  Date 10/28/2017

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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:

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8 Name Judith M. Gibbs Signature Judith M Gibbs  
Street Address 4338 32nd Ave West or email jude@writeguru.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:

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9 Name Alice Fogari Signature A Fogari  
Street Address 1510 Francis or email \_\_\_\_\_  
Registered Seattle voter? (Circle One)  Yes No Date 10/29/2017

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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

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11 Name Chase Thompson Signature [Signature]  
Street Address 4343 31st Ave W or email \_\_\_\_\_  
Registered Seattle voter? (Circle One)  Yes No Date 10/23/17

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:

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12 Name John De Grande Signature [Signature]  
Street Address 4009 W. Bertina St or email \_\_\_\_\_  
Registered Seattle voter? (Circle One)  Yes No Date 10.28.17

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13 Name Michael M'Hugh Signature [Signature]  
Street Address 4009 W Bertina 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:

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14 Name Carrie Husein Signature [Signature]  
Street Address 3514 W. BERTINA ST. or email CARRIE@CRABAPPLESANDRICE.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:

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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 \_\_\_\_\_

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16 Name Andrew Kirsh Signature Andrew Kirsh  
Street Address 1414 E. Harrison St. or email andrewkirsh@hotmail.com  
Registered Seattle voter? (Circle One)  Yes No Date 10-30-17

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17 Name David Moehring Signature David Moehring  
Street Address 3444 73rd Ave #B or email dmoehring@consultant.com  
Registered Seattle voter? (Circle One)  Yes No Date 10-30-2017

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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:

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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

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20 Name Linda Botzell Signature Linda Botzell  
Street Address 1728 Magnolia Blvd West or email lindabotzell@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  
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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

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22 Name Kristin Stanislaw Signature [Signature]  
Street Address 2823 35th Ave West or email Kristin.Stanislaw@gmail.com  
Registered Seattle voter? (Circle One)  Yes No Date 10/20/17

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23 Name Tim Opriela Signature [Signature]  
Street Address 2923 35th Ave West or email Kristin.Stanislaw@gmail.com  
Registered Seattle voter? (Circle One) Yes No Date 10/30/17

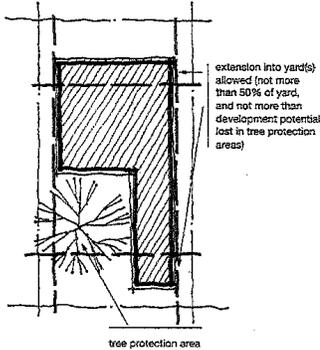
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24 Name Levi Berklow Signature [Signature]  
Street Address 2829 35th Ave W or email LEVI.BERKLOW@GMAIL.COM  
Registered Seattle voter? (Circle One) Yes No Date 10-30-17

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

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Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DD/Publications/CAM/cam21.pdf>

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

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25 Name Bruce D. Carter Signature [Signature]  
Street Address 3012 W. Eaton, Seattle or email \_\_\_\_\_  
Registered Seattle voter? (Circle One)  Yes  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:

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26 Name REITH SANDERS Signature [Signature]  
Street Address 3012 West Belmont or email \_\_\_\_\_  
Registered Seattle voter? (Circle One)  Yes  No Date 10/26/17

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27 Name Keon Brooks Signature [Signature]  
Street Address 2855 35<sup>th</sup> Ave W or email \_\_\_\_\_  
Registered Seattle voter? (Circle One)  Yes No Date 10/30/17

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28 Name Christina Brooks Signature [Signature]  
Street Address 2855 35<sup>th</sup> Ave W or email christinabrooks@gmail.com  
Registered Seattle voter? (Circle One) Yes  No Date 10/30/17

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29 Name Colin Sachs Signature [Signature]  
Street Address 2945 35<sup>th</sup> Ave W or email \_\_\_\_\_  
Registered Seattle voter? (Circle One)  Yes No Date 10/30/17

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30 Name Carrie Frankenburg Signature [Signature]  
Street Address 2906 39<sup>th</sup> Ave W or email \_\_\_\_\_  
Registered Seattle voter? (Circle One)  Yes No Date 10/30/17

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31 Name James M. Muller Signature James M. Muller  
Street Address 3916 W. Barton or email jim.muller.com@gmail.com  
Registered Seattle voter? (Circle One)  Yes No Date Oct 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:

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32 Name PATRICK LIPO Signature Pat Lipo  
Street Address 3712 W. Prospect 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:

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- 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 W or email carldahlman1@comcast.net \*  
Registered Seattle voter? (Circle One)  Yes No Date 10/28/17

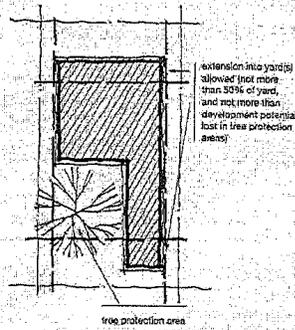
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, 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 MUMROE Signature John Mumroe  
Street Address 6553 25th AVE NW or email john@oceancurrents.biz  
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 principal structure with a minimum slope of 5:12 for a pitched roof 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/DED/Publications/CAM/2017.pdf>

Figure 2 – Current tree protection measures in lowrise development shall be extended into ADU development parameters.

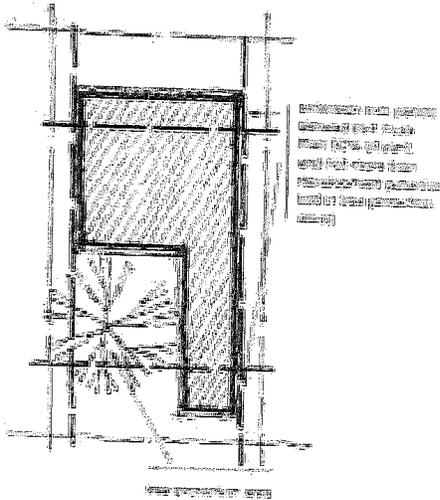
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, 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 visibility of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

795 Name Patricia Loesche Signature Patricia Loesche  
Street Address 4317 2nd Ave NW 98107  
or email \_\_\_\_\_  
Registered Seattle voter? (Circle One) Yes No Date 10/31/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – May 2017

Figure 1. Example of tree protection in single family zones



Protect tree preservation zones surrounding the tree canopy... (text is partially obscured and difficult to read)

- Minimum tree preservation zone (TPZ) for trees with DBH 10-14 inches
- Minimum tree preservation zone (TPZ) for trees with DBH 15-19 inches
- Minimum tree preservation zone (TPZ) for trees with DBH 20-24 inches

Lawrise 1, Lawrise 2 and Lawrise 3 Zones

If there is an existing tree within the proposed... (text is partially obscured and difficult to read)

Additional tree preservation zones... (text is partially obscured and difficult to read)

Figure 2. Current tree preservation standards in Seattle's designated ADU (to be revised per ADU) single family zones.

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 existing 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 on 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 plan subdivisions of lots over 6,000 square feet in density.

36 Name: Julia Field Signature: [Signature]  
Street Address: 2834 N NW 60th St or email: juliafield@gmail.com  
Registered Seattle voter? (Circle Yes/No) Yes 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 existing 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 on 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 plan subdivisions of lots over 6,000 square feet in density.

37 Name: Julie Galper no back Signature: [Signature]  
Street Address: \_\_\_\_\_ or email: yu.jazz@gmail.com  
Registered Seattle voter? (Circle Yes/No) Yes 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 Bille 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

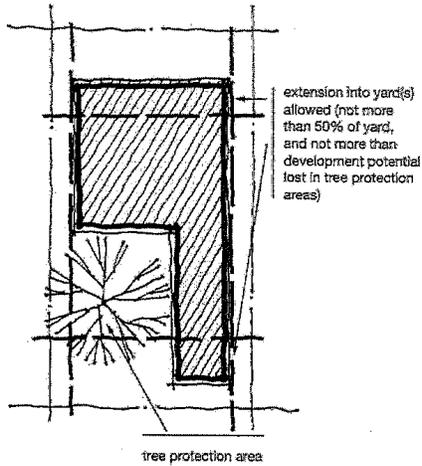
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, 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 [Email]  
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 23.45.614.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 [Signature]  
Street Address 4335 2nd AVE NW, 98107 or email brgovmail@rulifson.com  
Registered Seattle voter? (Circle One)  Yes No Date 31 October 2017

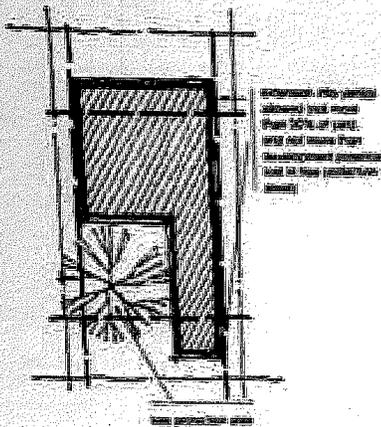
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, 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 [Signature]  
Street Address 3630 244th Ave W or email jewelross@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



When construction plans affecting the tree canopy (removal, pruning, etc.) are submitted, the applicant shall provide the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio rules. The project due to its development potential must use one of the more of the following options if it should also preserve nature of the tree:

- Development shall not exceed the maximum allowed floor area pursuant to 23.41.010.
- Development shall not exceed the maximum allowed floor area pursuant to 23.41.015.
- Increase in covered height as permitted in 23.41.020 A.3 of up to 20 feet to the level of finished floor with a maximum slope of 4:12 for a finished structure with a total height area of 400 sq. ft. that is subject to the proposed floor coverage of 23.45.010. The 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 23.41.020 A.3.

Applicants may use any of the above departments to assist their team.

http://www.seattle.gov/23rd/Petitioner-CRM.html.pdf

Figure 2 - Current tree protection measures in lower development shall be extended into ADU development parameters

As a Seattle resident, I do not support proposed Alternative #3 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope containing 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 plot subdivisions of lots over 6,000 square feet to density.

44

Name: Tanice Price Signature: Tanice E. 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 containing 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:

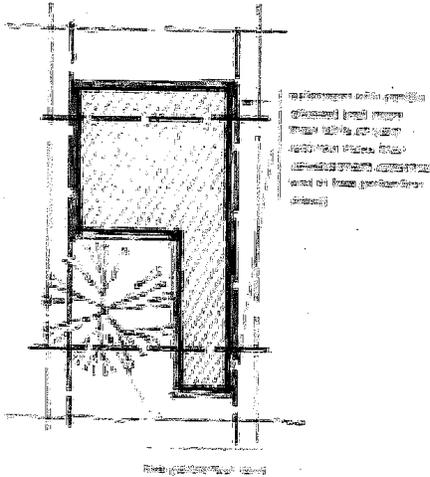
- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet to density.

45

Name: Latasha Signature: Latasha  
 Street Address: 2032 23rd Ave or email:  
 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



Existing tree canopy shall not overlap with proposed ADU footprint. ADU footprint shall not overlap with existing tree canopy.

- Existing trees shall be protected and preserved to the maximum extent possible.
- Existing trees shall be protected and preserved to the maximum extent possible.
- Existing trees shall be protected and preserved to the maximum extent possible.
- Existing trees shall be protected and preserved to the maximum extent possible.

Lowrise 1, Lowrise 2 and Lowrise 3 Zones

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 maintaining 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 street plat subdivisions of lots over 6,000 square feet in density.

Figure 2 - Current tree protection measures in residential 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 maintaining 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 street plat subdivisions of lots over 6,000 square feet in density.

49 Name DAVIDYA KOPCZYK Signature D. Kopyczyk  
Street Address 1543 NW 62nd St or email kzkbi@icloud.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 maintaining 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 street plat subdivisions of lots over 6,000 square feet in density.

50 Name Phoebe Fine Signature Phoebe Fine  
Street Address 1543 NW 62nd St or email Phoebe.Fine@u.wa.edu  
Registered Seattle voter? (Circle One)  Yes  No Date 10/27/17

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 containing 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 homes for ADU financing options alternatives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet in 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 containing 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:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homes for ADU financing options alternatives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet in density.

47 Name: Laura Wix Signature: [Signature]  
Street Address: 3652 23rd Ave W or email: laurawix@comcast.net  
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 containing 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:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homes for ADU financing options alternatives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet in density.

48 Name: Jake Sankup Signature: [Signature]  
Street Address: 3652 23rd Ave W or email: \_\_\_\_\_  
Registered Seattle voter? (Circle One) Yes  No  Date: 11/10/17

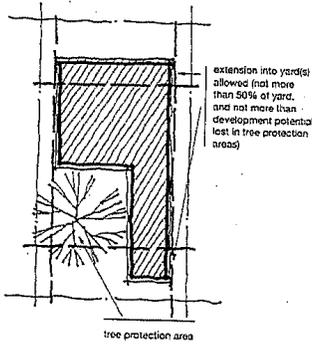
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope, and hereby petition for the City of Seattle to include within the EIS Scope containing current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, 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 homes for ADU financing options alternatives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet in 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:

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- 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/DFD/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:

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- 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 2146 40th Ave W or email Betsy.Ross@gmail.com  
Registered Seattle voter? (Circle One) Yes No Date 10/20/17

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:

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- 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 2146 40th Ave W or email charles.ross@gmail.com  
Registered Seattle voter? (Circle One) Yes No Date 10/20/17

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:

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- 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:

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- 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).  
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- 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 MELISSAMARTIN@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 Avenue 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).  
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- 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 1533 Eastern Ave or email SCOTT@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).  
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- 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. Risser Signature DAVID L. RISSER  
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:

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- 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 Swanberg Signature Irene Swanberg  
Street Address 2613 35th Ave or email iswanlets@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:

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- 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 TRIVU Signature Triv  
Street Address 2638 35th Ave W or email triv0300@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:

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- 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 Gratchen Johnson Signature G Johnson  
Street Address 2629 35th Ave W or email gratchen-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:

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- 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 J 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  
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- 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. W. Williamson Signature Bill H. W. 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).  
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- 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 Jean M. Sullivan Signature Jean M. Sullivan  
Street Address 2856 36th Ave W or email jean212@email.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).  
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- 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 MBLUMS@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).  
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- 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

- 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:

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- 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.BRODIECGMAIL.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:

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- 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 BISSER Signature Rebecca Bisser  
Street Address 2893 35<sup>th</sup> Ave W or email broneur@swede.comcast.net  
Registered Seattle voter? (Circle One) Yes  No  Date 10-31-17

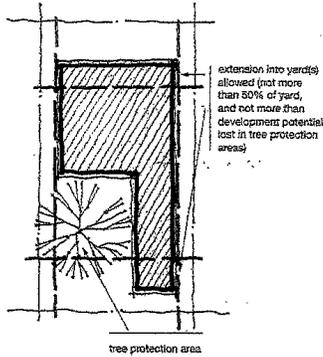
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- 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 EDYTH BIRK Signature Edyth Birk  
Street Address 2602 35<sup>th</sup> 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



**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/DDP/Publications/CAMF-csm212.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:

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- 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:

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- 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 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:

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73 Name Frederick C. Parks Signature Frederick C. Parks  
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:

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- 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 Boswell Signature Natasha Boswell  
Street Address 2014 West Ravenna or email ntshboswill85@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:

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- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

75 Name George Dimas Signature George Dimas  
Street Address 2637 35th Ave W or email dimasgis2@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:

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- 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 chridome@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  
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- 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 TICAM PELTER Signature TICAM PELTER  
Street Address 10412 DAUGHTON 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:

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- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

78 Name Helen R. Haladyan Signature Helen R. Haladyan  
Street Address \_\_\_\_\_ or email hthaladyan@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:

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- 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 helenmcduffie34@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:

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80 Name Alison Eckels Signature alison@eckelsdesign.com  
Street Address 311 N. 7th St. #200 or email \_\_\_\_\_  
Registered Seattle voter? (Circle One)  Yes  No Date \_\_\_\_\_

81 ~~Wendy~~ Wendy Thompson Shearer  
2107J NW 65th St  
Seattle, WA 98117  
(yes)  
wendythompsonshearer@gmail.com

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study Nov 2017  
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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet to density.

82 Name MARK COOPER Signature [Signature]  
Street Address 2630 NW 82<sup>nd</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:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet to density.

83 Name ANNE HENNINGSEN Signature [Signature]  
Street Address 2650 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:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet to density.

84 Name ALFON TOLLESON Signature [Signature]  
Street Address 4112 1<sup>st</sup> AVE S 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:

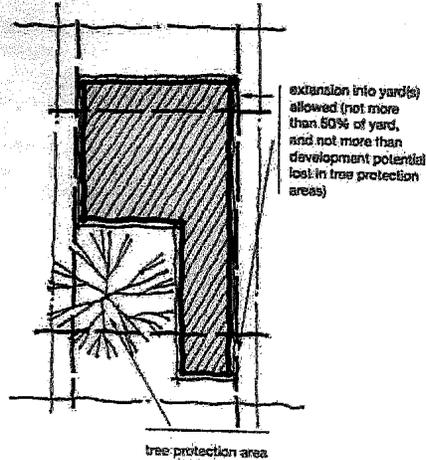
- Measuring the incremental impacts to Seattle's designated Tree Canopy.
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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet to density.

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 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:

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- 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:

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- 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 Hiesel Signature [Signature]  
Street Address 1409 NE 70th St or email \_\_\_\_\_  
Registered Seattle voter? (Circle One)  Yes  No Date 10/27/2017

## RESPONSES TO MAGNOLIA COMMUNITY COUNCIL PETITION

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.
- 4 Thank you for your comment. The comment is noted.
- 5 Thank you for your comment. The comment is noted.
- 6 The City has previously required ongoing monitoring of ADUs and may include that requirement in the final legislation
- 7 Please see frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use, and exceptions added to the preferred alternative to preserve trees.
- 8 Please see frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use, and exceptions added to the preferred alternative to preserve trees.
- 9 Please see Section 4.2, Land Use, which has been updated in this Final EIS to include a discussion of parks and open space.
- 10 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 11 The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of Accessory Dwelling Units. Implementation of subdivisions are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.
- 12 Thank you for your comment. The comment is noted.
- 13 Thank you for your comment. The comment is noted.
- 14 Thank you for your comment. The comment is noted.
- 15 Thank you for your comment. The comment is noted.
- 16 Thank you for your comment. The comment is noted.
- 17 Thank you for your comment. The comment is noted.

## 5.6 Responses to Verbal and Written Comments Received at the Public Hearing

This section provides responses to verbal and written comments we received at the Draft EIS Public Hearing on May 31, 2018. Responses to verbal comments appear in the order that people commented. Appendix E includes a transcript of verbal comments and scanned copies of written comments we received at the hearing.

### RESPONSES TO VERBAL COMMENTS SUBMITTED AT THE PUBLIC HEARING

#### Hosford, Shawn

- 1 Thank you for your comment. The comment is noted.

#### Johnston, Emily

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Please see Chapter 2, Alternatives, for a description of what is included related to reducing costs, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 4 Thank you for your comment. The comment is noted.

#### Compton, Angela

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

#### Malaba, Patience

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

#### Bernstein, Laura

- 1 Thank you for your comment. The comment is noted.

#### Jones, Calvin

- 1 Thank you for your comment. The comment is noted.

- 2 Please see Chapter 2, Alternatives, for a description of what is included related to reducing costs, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.

### **Ludwick, Rachel**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

### **Eric**

- 1 Thank you for your comment. The comment is noted.

### **Lubarsky, Zach**

- 1 Thank you for your comment. The comment is noted.

### **Ike, Elaine**

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

### **Kaplan, Marty**

- 1 Please see the frequent comment response regarding individual neighborhood review.

### **Shaner, Zach**

- 1 Thank you for your comment. The comment is noted.

### **Lockhart, Alice**

- 1 Please see the frequent comment response concerning the proposal's positive impacts.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

### **Newbold, Sheri**

- 1 Thank you for your comment. The comment is noted.

### **Nourish, Bruce**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

### **Hutchins, Matt**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

### **Miles, Don**

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Section 4.3, Aesthetics, for graphics and text added related to development on a sloping site and Section 4.2, Land Use, which has been updated to include a discussion of historic resources. Please also see the frequent comment response concerning impacts to parking.
- 3 The Full Build-Out scenario was included only in the aesthetics analysis to illustrate a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it here to illustrate the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.

### **Simpson, Jesse**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

### **Westgren, Jessica**

- 1 Thank you for your comment. The comment is noted.

### **Pittenger, Glenn**

- 1 Thank you for your comment. The comment is noted.

### **Cali, Larry**

- 1 Thank you for your comment. The comment is noted.

### **Fessel, Andy**

- 1 Thank you for your comment. The comment is noted.

### **Ilgenfutz, Kris**

- 1 Thank you for your comment. The comment is noted.

### **Chapman, Paul**

- 1 Thank you for your comment. The comment is noted.

### **DeLucas, Karen**

- 1 Thank you for your comment. The comment is noted.

### **Wadsned, Ben**

- 1 Thank you for your comment. The comment is noted.

### **Kahn, Marie**

- 1 Thank you for your comment. The comment is noted.

### **Moehring, David**

- 1 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 2 Thank you for your comment. The comment is noted.

### **Scruggs, Gregory**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

### **Murphy, Megan**

- 1 Thank you for your comment. The comment is noted.

### **Refer, Kelli**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

### **Williams, Bonnie**

- 1 Thank you for your comment. The comment is noted.

- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

### **Hirami, Eileen**

- 1 Thank you for your comment. The comment is noted.

### **Bird, Denny**

- 1 Thank you for your comment. The comment is noted.

### **Nachtigal, M.C.**

- 1 Thank you for your comment. The comment is noted.

## **RESPONSES TO WRITTEN COMMENTS SUBMITTED AT THE PUBLIC HEARING**

### **Murishia, Sean**

- 1 Thank you for your comment. The comment is noted.

### **Smith, Brecca**

- 1 Thank you for your comment. The comment is noted.

### **Jaeger, Sam**

- 1 Thank you for your comment. The comment is noted.

### **Gudonis, Peter**

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative, which would eliminate the owner-occupancy requirement.
- 4 Thank you for your comment. The comment is noted.
- 5 Thank you for your comment. The comment is noted.

### **Zerrell, Tim**

- 1 Thank you for your comment. The comment is noted.

### Olwell, Carol

- 1 Thank you for your comment. The comment is noted.
- 2 The public has been afforded opportunities to comment on the proposal during the scoping period and Draft EIS public comment period. The City has made adjustments to the proposal based on feedback received as outlined in Chapter 1, Summary.
- 3 Thank you for your comment. The comment is noted.
- 4 Please see Chapter 2, Alternatives, for a description of the alternatives. The proposal would not eliminate the property owner's responsibility to comply with all applicable laws and regulations.
- 5 Thank you for your comment. The comment is noted.
- 6 Thank you for your comment. The comment is noted.
- 7 Thank you for your comment. The comment is noted.
- 8 Thank you for your comment.
- 9 Thank you for your comment. The comment is noted.

# 6 References

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# 7 Distribution List

The Final EIS has been issued with a notice of availability and methods of publication required in SMC 25.05.510 Public Notice.

## **TRIBAL AND FEDERAL AGENCIES**

Duwamish Tribe

Muckleshoot Indian Tribe

Suquamish Tribe

Tulalip Tribes of Washington

United Indians of all Tribes Foundation

National Oceanic and Atmospheric Administration Fisheries, National Marine Fisheries Service

U.S. Army Corp of Engineers

U.S. Department of Agriculture, Wildlife Services Division

U.S. Department of Ecology, Northwest Regional Office

U.S. Department of Fish and Wildlife Services

U.S. Department of Fish and Wildlife Services, EIS Reviews

U.S. Department of Housing and Urban Development

U.S. Environmental Protection Agency

## **REGIONAL AND COUNTY AGENCIES**

King County Department of Design and Environmental Services

King County Department of Natural Resources, Parks Division

King County Department of Public Health

King County Department of Transportation

King County Executive's Office

King County Housing and Community Development

King County Land Use Services Division

King County Metro Transit

King County Regional Water Quality Committee

King County Wastewater Treatment Division

Port of Seattle Environmental Management

Public Health — Seattle and King County

Puget Sound Clean Air Agency

Puget Sound Regional Council of Governments

Sound Transit

## **STATE OF WASHINGTON**

Department of Archaeology and Historic Preservation

Department of Commerce, Growth Management Services

Department of Community Development

Department of Ecology

Department of Ecology, SEPA Unit

Department of Fish and Wildlife

Department of Health

Department of Natural Resources

Department of Social and Health Services

Department of Transportation

## **CITY OF SEATTLE AND SEATTLE SERVICE PROVIDERS**

City of Seattle Department of Education and Early Learning

City of Seattle Department of Neighborhoods

City of Seattle Department of Neighborhoods,  
Historic Preservation Program

City of Seattle Department of Parks and Recreation

City of Seattle Department of Transportation

City of Seattle Landmarks Preservation Board

City of Seattle Office of Emergency Management

City of Seattle Office of Housing

City of Seattle Office of Planning and Community Development

City of Seattle Police Department

City of Seattle School District

Seattle City Council

Seattle City Light

Seattle Housing Authority

Seattle Indian Services Commission

Seattle Public Library, Public Review Documents

Seattle Public Utilities

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