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:

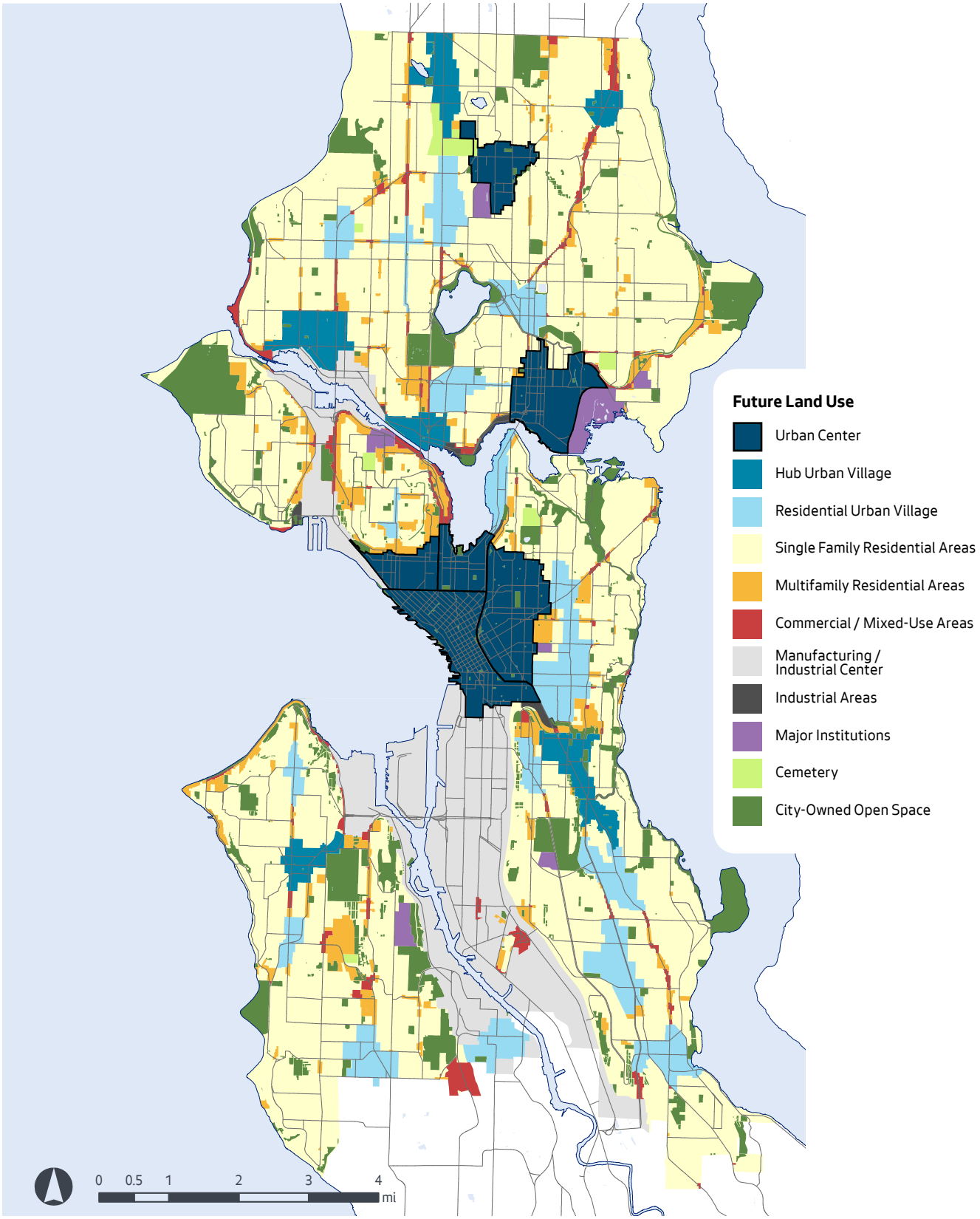
- **Community.** Developing strong connections between a diverse range of people and places.
- **Environmental Stewardship.** Protecting and improving the quality of our global and local natural environment.

- **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



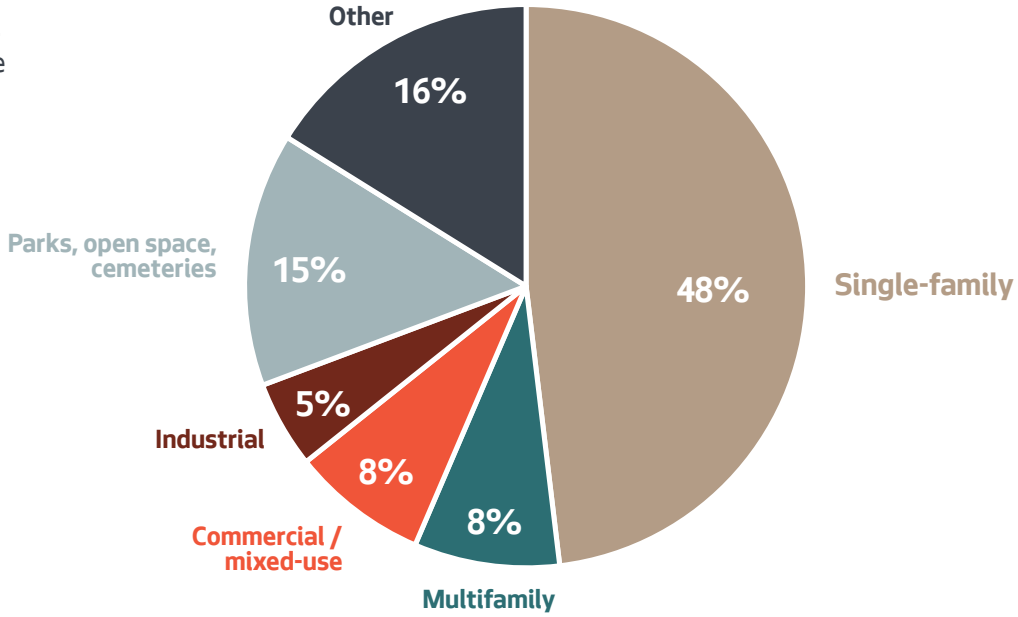
POPULATION DENSITY

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.[1]

Exhibit 4.2-2
Current Land Use in Seattle



1 Excluding rights-of-way.

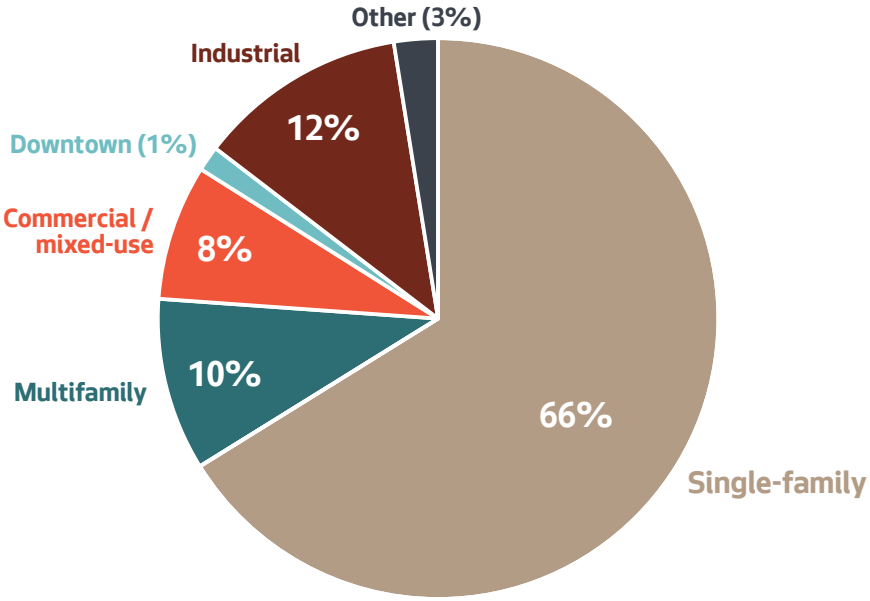


Exhibit 4.2-3
Current Zoning in Seattle

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

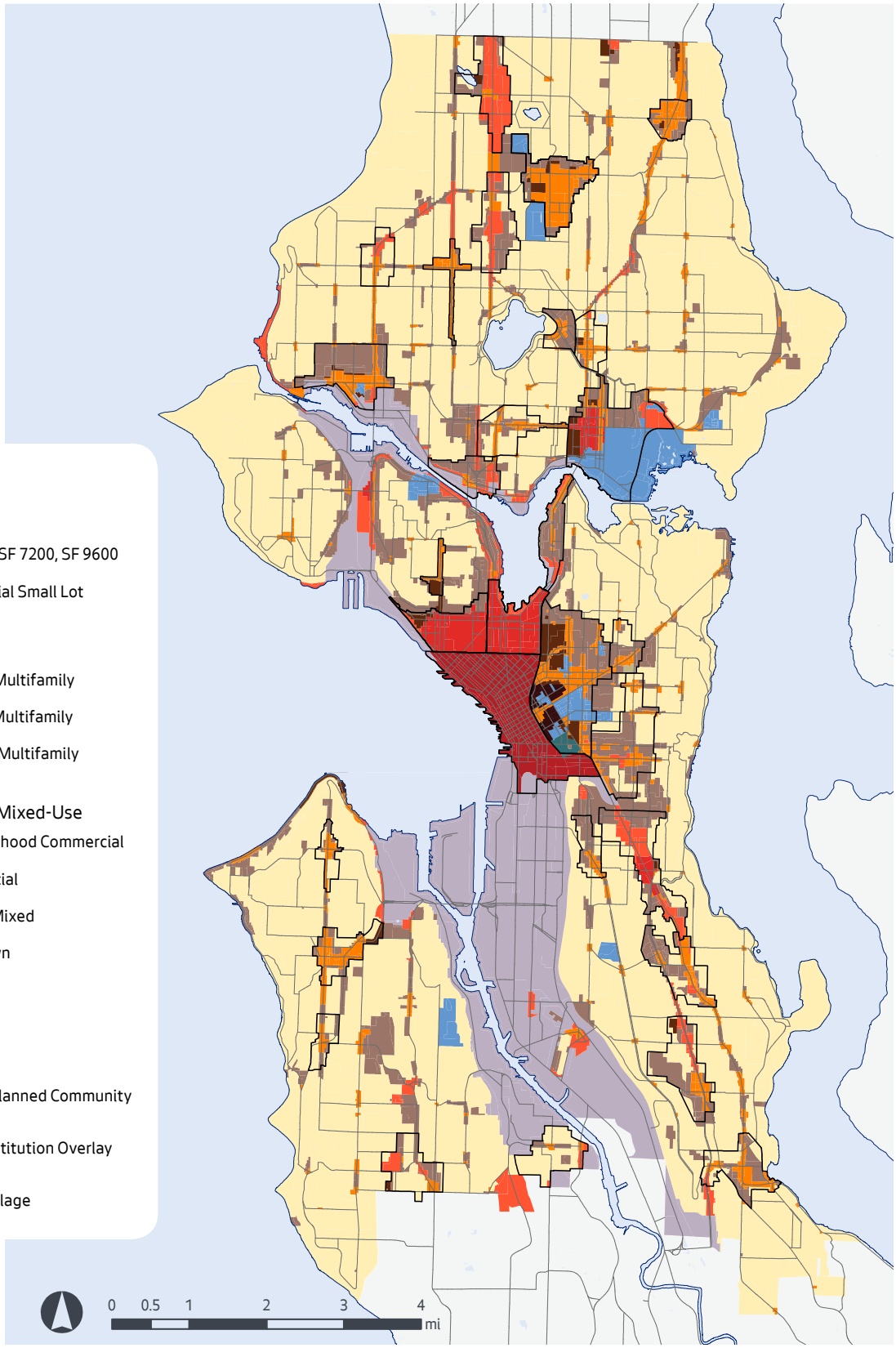
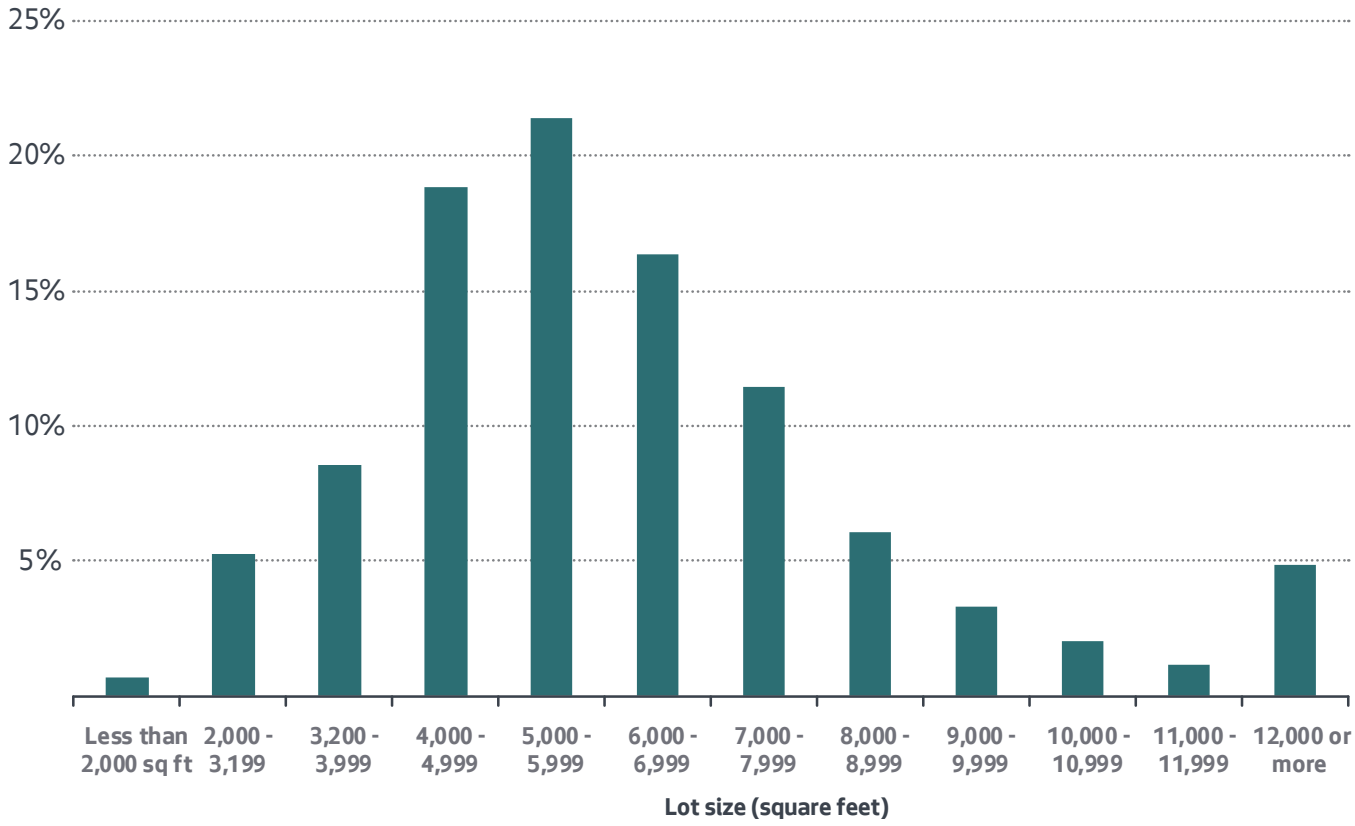


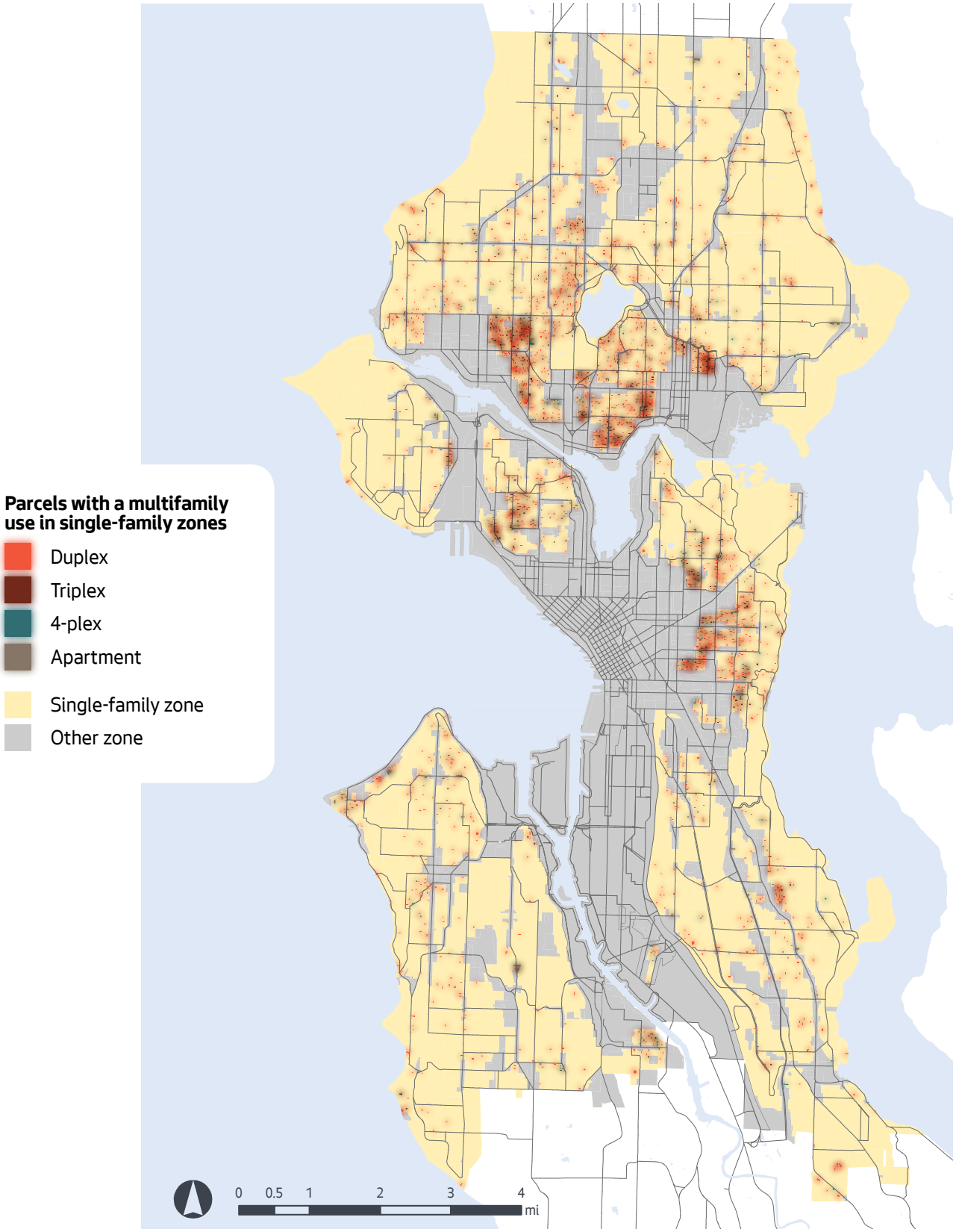
Exhibit 4.2-5 shows the distribution of parcels by lot size across Seattle's single-family zones. About 33 percent of all single-family lots are smaller than 5,000 square feet, the smallest lot size allowed under current zoning. About eight percent have at least twice the minimum area required by the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

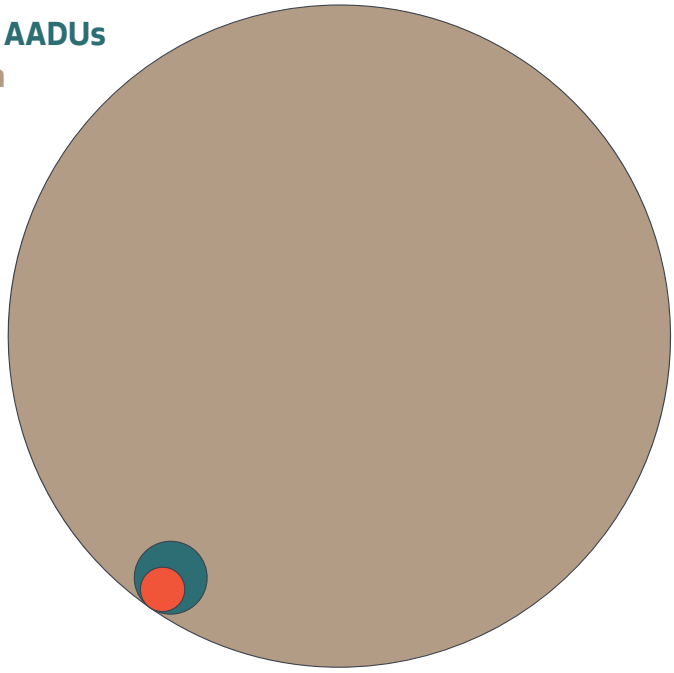


Chapter 23.44 of the Seattle Municipal Code (SMC) regulates single-family zones. Attached ADUs (AADUs) are currently allowed inside or attached to the main house on all lots in single-family zones. Detached ADUs (DADUs) are currently allowed in all single-family zones on lots of at least 4,000 square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

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.

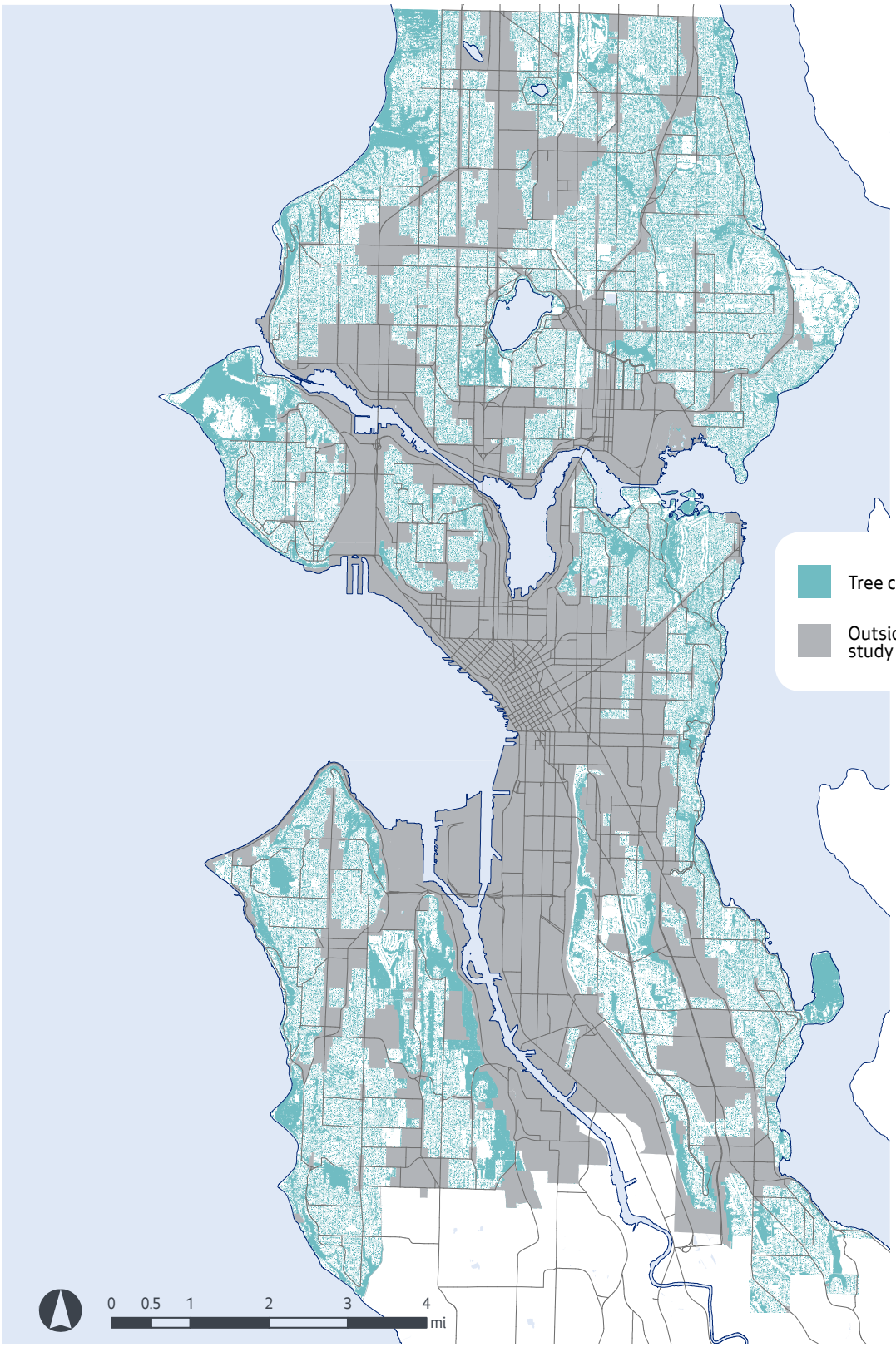
In 2016, the City obtained LiDAR (light detection and ranging) data to assess progress toward its 30-percent canopy cover goal (Seattle 2016). This study represents the most accurate accounting of Seattle's urban canopy to date and shows:

- 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.

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.

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.[2]

New in the FEIS

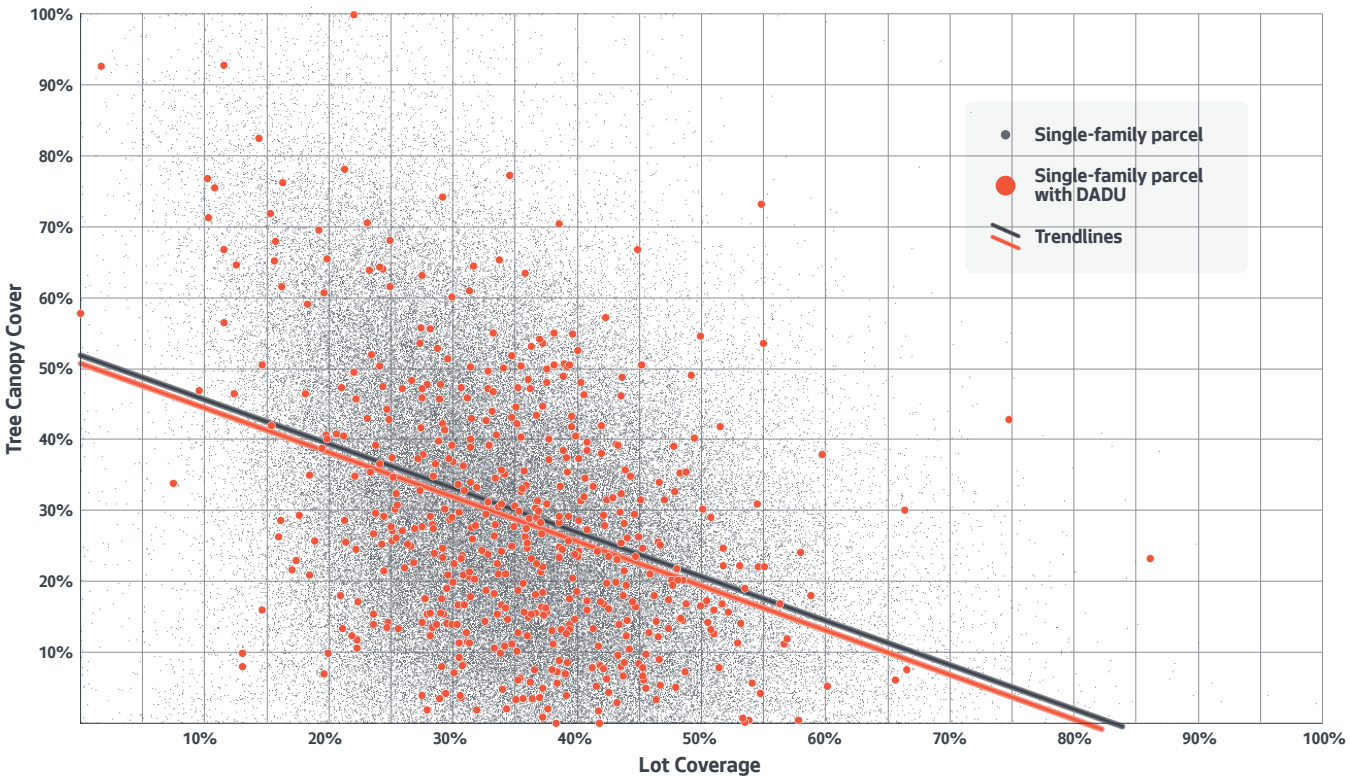
Exhibit 4.2-9 and Exhibit 4.2-10 are new exhibits in the Final EIS.

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



2 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[3] 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

3 "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
Wildlife Habitat	595.7	5,538.5	11%
Wetland	85.8	546.9	16%
Steep Slope Area	1,706.6	4,379.5	39%
Riparian Corridor	452.0	1,496.5	30%
Potential Slide	1,756.3	4,471.4	39%
Potential Liquefaction Area	472.8	8,023.5	6%
Peat Settlement Prone Area	190.1	1,943.8	10%
Landfill	275.6	1,820.4	15%
Known Slide	172.4	380.9	45%
Flood-Prone Area	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.

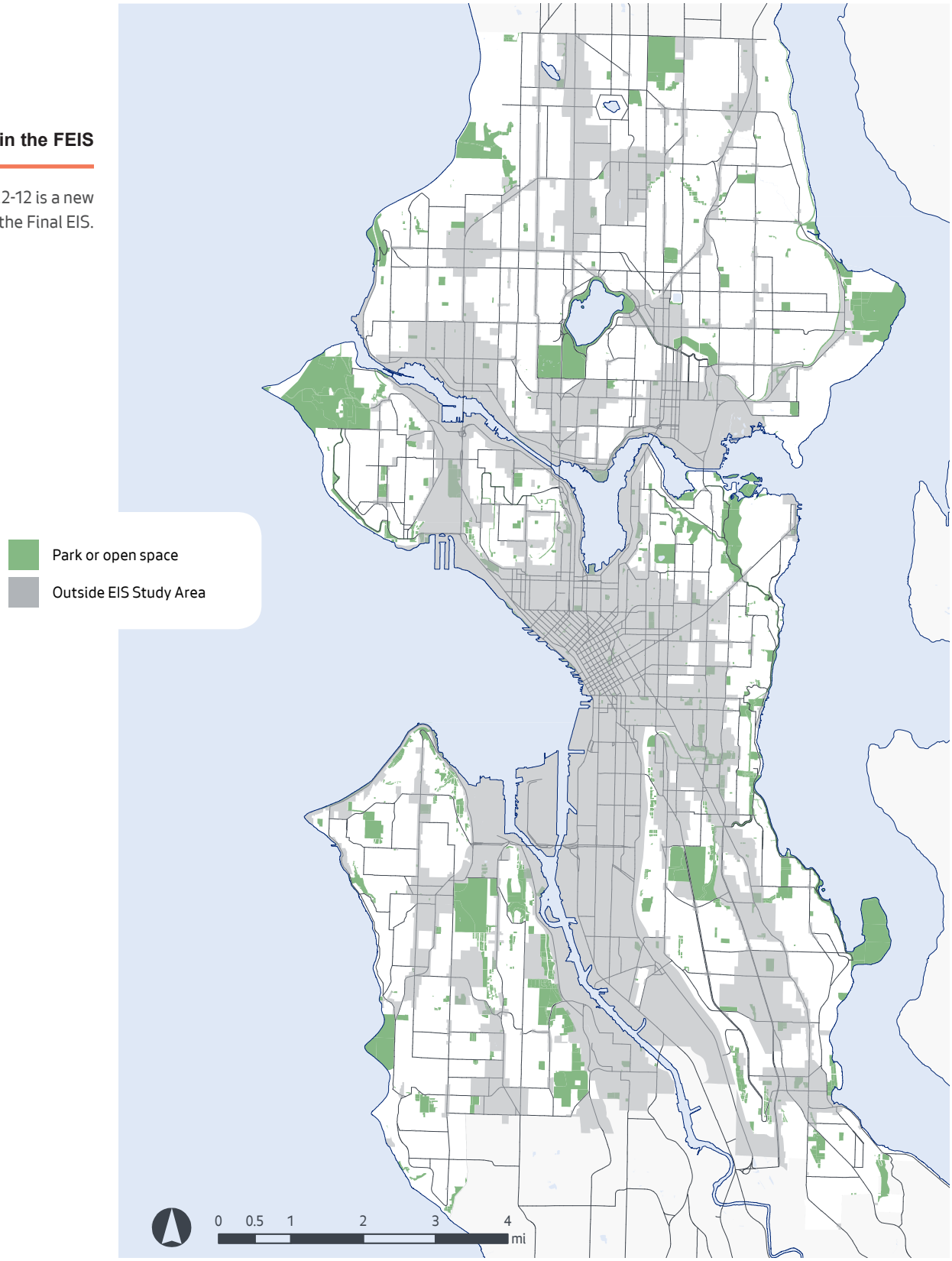
The Parks and Open Space Element of the City's Comprehensive Plan establishes goals and polices for parks, open space, and recreation facilities to serve Seattle's growing population. In 2017, the City adopted the 2017 Parks and Open Space Plan (2017 Plan), a separate but complementary document to the 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.



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

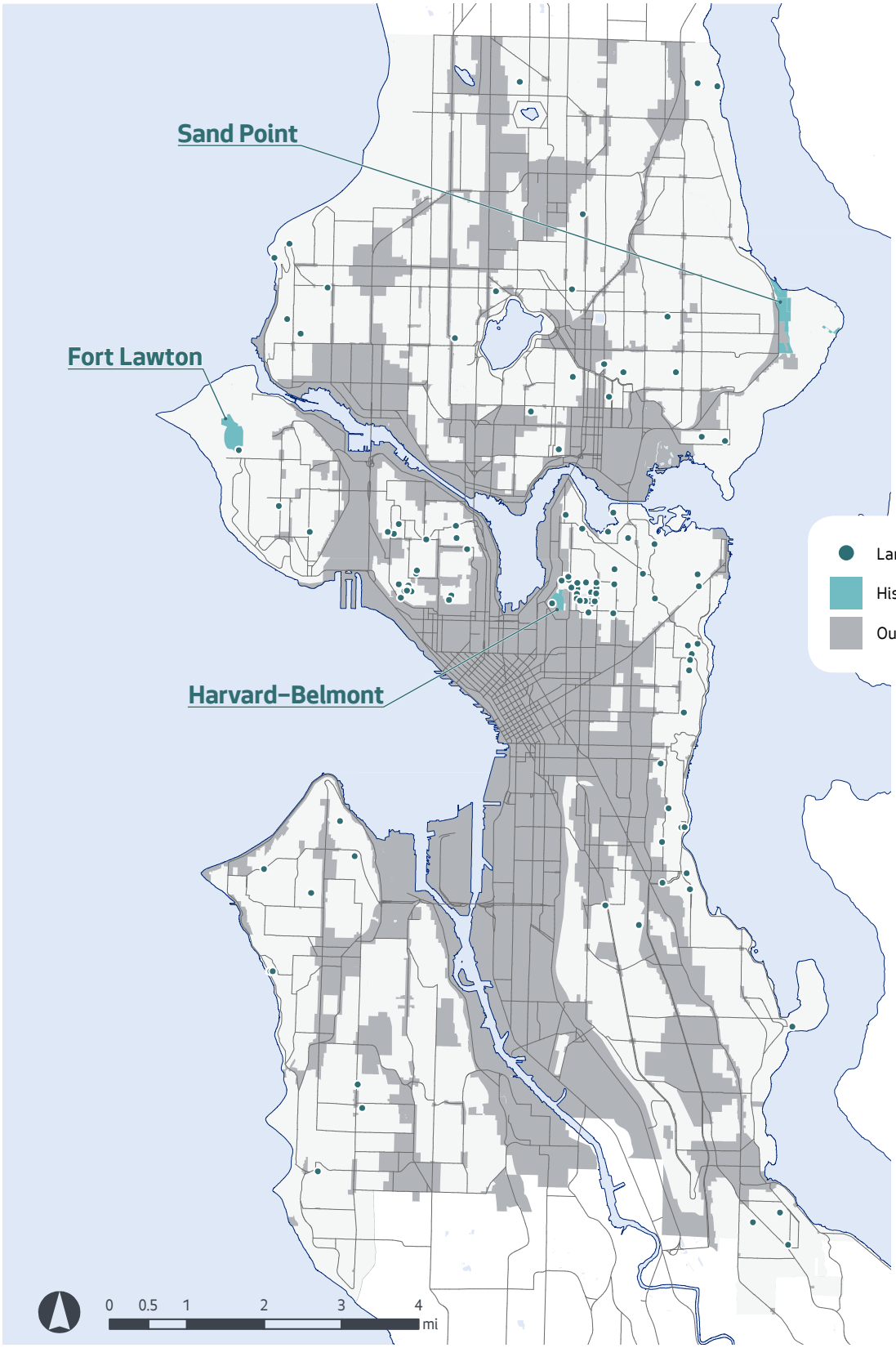
When subject to review under the State Environmental Policy Act (SEPA), projects involving demolition or substantial modifications to structures more than 50 years old adjacent to or across the street from designated Seattle Landmarks are referred to the City's Historic Preservation Officer for an assessment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



New in the FEIS

Exhibit 4.2-13 is a new exhibit in the Final EIS.

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 ~~1,890~~ 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~~ [4]
- 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

4 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 ~~a~~llocated 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 ~~0.1~~ 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.

Exceptional Trees

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

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

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 ~~al~~located 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.