Welcome.

Thank you for coming to the public hearing on the Accessory Dwelling Units Draft Environmental Impact Statement.

5:30 p.m. Open House
6:30 p.m. Public Hearing
An Environmental Impact Statement (EIS) is a tool to inform decision makers about the positive and negative effects of a proposal. The proposal might be a project, like construction of a new building or road, or a new policy or plan that could affect the environment. Washington's State Environmental Policy Act (SEPA) requires Environmental Impact Statements so that the public, tribes, and other public agencies can help identify a proposal's environmental impacts, as well as strategies for reducing or avoiding them. Decision-makers can then approve, modify, or deny the proposal as appropriate.

**What is an EIS?**

**Conduct SEPA Scoping**

We issued a Determination of Significance (DS) and Scoping Notice for the ADU EIS on October 2, 2017.

We extended the comment period 15 days to close on November 16, 2017. We also held two public scoping meetings on October 17 and 26.

We reviewed scoping comments and prepared the Draft EIS.

We issued the Draft EIS on May 10, 2018.

**Draft EIS Public Comment Period**

The Draft EIS public comment period will close on June 25, 2018. The comment period includes tonight’s public hearing.

**Prepare Final EIS**

The Final EIS will address comments received during the comment period.

Tentatively scheduled to be issued in late summer or early fall 2018.

**Issue Final EIS**

The City Council will discuss and vote on proposed legislation to amend the Land Use Code.

**City Action**

**How can I comment?**

The Draft EIS comment period is from May 10 to June 25, 2018.

All comments received will be published in the Final EIS.

You can sign up to comment at tonight’s hearing or in one of the following ways:

- Complete our online comment form, available at seattle.gov/council/ADU-EIS
- Send an email to ADUEIS@seattle.gov
- Write to Aly Pennucci, PO Box 34025 Seattle, WA 98124-4025

**Making a Draft EIS Comment**

A Draft EIS provides an opportunity for the public to review the environmental analysis and make comment about how to improve its adequacy and completeness. Later this year, we will prepare a Final EIS that responds to Draft EIS comments and includes a preferred alternative.

An effective Draft EIS comment focuses on the EIS. The purpose is to comment on the analysis and alternatives, not issues outside the proposal, and not about support of or opposition to ADUs in general.

Written comments carry the same weight as verbal comments and are being accepted until June 25, 2018. We encourage you to consider submitting a written comment because a written comment:

- Ensures the comment is captured in your own words
- Can include more detailed and specific information than a brief verbal comment
- Allows you more time to review the content of DEIS before commenting

There is no additional weight to your verbal comment if it duplicates a written comment you submit. All verbal comments received at the hearing are recorded and part of the official record.
We are proposing to change regulations in the Land Use Code to remove regulatory barriers to the creation of ADUs in single-family zones. 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.

**WHAT IS AN ADU?**
ADUs are small, secondary units on a single-family lot. A detached accessory dwelling unit (DADU), often called a backyard cottage, is a secondary unit located in a separate structure from the main house. An attached accessory dwelling unit (AADU), often called a basement apartment or in-law unit, is a secondary unit located within or connected to the main house.

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. Our 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. 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.

**WHAT'S THE GOAL?**
The objectives of this proposal 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

This proposal aims to implement Seattle’s Comprehensive Plan policies related to development of 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.

**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.
## Alternatives

<table>
<thead>
<tr>
<th>Alternative 1 (No Action)</th>
<th>Alternative 2</th>
<th>Alternative 3</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Number of ADUs allowed on lots in single-family zones</strong></td>
<td>Lots in single-family zones can have one AADU or one DADU, but not both.</td>
<td>Lots in single-family zones can have an AADU and a DADU.</td>
</tr>
<tr>
<td><strong>Off-street parking requirements</strong></td>
<td>One off-street parking space is required for an AADU or a DADU unless the lot is in an urban village.</td>
<td>No off-street parking required.</td>
</tr>
<tr>
<td><strong>Owner-occupancy requirements</strong></td>
<td>An owner must occupy either the main house or the AADU/DADU for six months of the year.</td>
<td>No requirement for an owner to occupy the house, AADU, or DADU.</td>
</tr>
<tr>
<td><strong>Minimum lot size</strong></td>
<td>4,000 square feet</td>
<td>3,200 square feet</td>
</tr>
<tr>
<td><strong>Maximum gross floor area</strong></td>
<td>AADU 1,000 square feet, including garage and storage areas.</td>
<td>AADU 1,000 square feet, excluding garage and storage areas.</td>
</tr>
<tr>
<td></td>
<td>DADU 800 square feet, including garage and storage areas.</td>
<td>DADU 1,000 square feet, excluding garage and storage areas.</td>
</tr>
<tr>
<td><strong>Maximum height</strong></td>
<td>No change from existing height limits, which vary by lot width and range from 15 to 23 feet.</td>
<td>Height limits are 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.</td>
</tr>
<tr>
<td><strong>Lot coverage</strong></td>
<td>No change from current regulations.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Lots greater than 5,000 square feet: 35 percent of lot area.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Lots less than 5,000 square feet: 15 percent of lot area plus 1,000 square feet.</td>
<td></td>
</tr>
<tr>
<td><strong>Rear yard coverage</strong></td>
<td>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.</td>
<td>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 cannot exceed 40 percent.</td>
</tr>
<tr>
<td><strong>Roof features</strong></td>
<td>No exceptions for roof features on accessory structures are allowed.</td>
<td>Height limit exceptions are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.</td>
</tr>
<tr>
<td><strong>Location of DADU entry</strong></td>
<td>DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.</td>
<td>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).</td>
</tr>
<tr>
<td><strong>Maximum household size</strong></td>
<td>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.</td>
<td>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.</td>
</tr>
<tr>
<td><strong>MHA requirements</strong></td>
<td>Mandatory Housing Affordability (MHA) does not apply to creation of ADUs on lots in single-family zones.</td>
<td>No change from Alternative 1 (No Action).</td>
</tr>
<tr>
<td><strong>Predevelopment costs</strong></td>
<td>No change.</td>
<td>Contemplates a 10-percent reduction in predevelopment costs.</td>
</tr>
</tbody>
</table>
| **Maximum floor area ratio (FAR) limit** | 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). | New construction 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. 
Existing houses: 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.
BACKGROUND
Seattle has about 348,000 housing units. Currently, less than two percent of Seattle’s roughly 135,000 lots in single-family zones have an AADU.

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).

HOUSING AFFORDABILITY
- 37 percent of all Seattle households pay more than 30 percent of their income on housing costs, meaning they are housing cost burdened.
- Renter households are significantly more likely to experience cost burden than owner-occupied households and nearly twice as likely to be severely cost-burdened.
- 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.
- The median closed sales price for residential units in King County in 2017 was $627,000.
- Recent data shows that affording a single-family rental is out of reach for most households. For households with incomes of 80 percent of the area median income (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 unaffordable.

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

Housing & Socioeconomics

INCOME & WEALTH

Median Household Income by Number of Units in Structure, Seattle Metropolitan Area
Source: 2015 American Housing Survey

Median Household Income by Race, Seattle
Source: 2016 5-Year American Community Survey

Housing Tenure by the Householder’s Racial or Ethnic Group, Seattle
Source: 2016 5-Year American Community Survey
Housing & Socioeconomics

**APPRAOCH TO THE ANALYSIS**

The housing and socioeconomics analysis explores the following questions:

- **Underlying Development Economics.** How might the proposed changes alter the underlying real-estate economics in single-family zones? Could the proposed Land Use Code 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?

Based on those findings, we 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)?

**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. To analyze the potential impacts of the alternatives on highest and best use in the study area, we used pro forma analysis, a common decision-making tool used by real estate developers and policymakers.

Our pro forma model evaluated more than 6,000 possible development outcomes based on residual land value, a metric that compares the relative feasibility of different development projects. 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?

The table to the right identifies the highest and best use for four prototypical parcels across various market areas and under each EIS alternative.
The land use analysis evaluates potential impacts by considering whether the proposal would result in changes to building density, population density, or scale that would be incompatible with existing development in Seattle’s single-family zones. We also discuss the city’s shoreline areas, environmentally critical areas (ECAs), and tree canopy and vegetation.

**CURRENT ZONING AND LAND USE**

- **Zoning**:
  - Industrial: 12%
  - Multifamily: 10%
  - Other (3%)
  - Downtown: 1%
  - Commercial / mixed-use: 8%
- **Land Use**:
  - Single-family: 66%
  - Parks, open space, cemeteries: 16%
  - Commercial / mixed-use: 8%
  - Industrial: 5%
  - Multifamily: 8%

**IMPACT ANALYSIS**

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 Seattle’s Comprehensive Plan.

Two types of land use impacts are relevant to the construction of ADUs and considered in this analysis:

- Increased density
- Change in building scale

**ALTERNATIVE 2**

- Higher likelihood of two ADUs constructed on the same lot but fewer lots with only one ADU constructed.
- 1,400 additional ADUs constructed in Alternative 2 (compared to Alternative 1) could lead to minor changes to building scale.
- Fewer existing houses torn down and rebuilt (2,460) compared to Alternative 1 (2,610).
- Localized impacts could occur if ADU production is higher in a concentrated area, such as a particular block in the study area.

- Overall, impacts would be negligible to minor and would not constitute a fundamental change in the land use pattern of Seattle’s single-family zones.
- 390 additional DADUs under Alternative 2 could result in more vegetation and tree removal, though in the context of the 135,000 lots in Seattle’s single-family zones, impacts would likely be minor overall.
- Removing the off-street parking requirement could also reduce the amount of vegetation and tree removal otherwise needed to accommodate a parking space when creating an ADU.

**ALTERNATIVE 3**

- Like Alternative 2, additional ADUs could increase the density and scale of development. Impacts would be less than under Alternative 2, since we anticipate fewer ADUs constructed.
- Fewer demolitions (2,200) than both Alternative 1 and Alternative 2. The feasibility of retaining an existing house and adding one or more ADUs would be higher under Alternative 3 due to the maximum FAR limit for new houses.

**SEATTLE’S COMPREHENSIVE PLAN**

Seattle’s Comprehensive Plan describes existing and future land use and policies to guide the development of the city in the context of regional growth management. The 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.”

Some goals and policies in the Plan’s Land Use Element related to ADUs include:

- **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.
- **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.
Aesthetics

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.

CURRENT URBAN FORM

The form of existing development varies widely across single-family zones in Seattle. The proposal would affect infill development in already developed neighborhoods, so typical existing conditions provide 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 and smaller than the largest houses zoning allows. Many recently built homes are three stories and fill the allowed zoning envelope.

ANALYSIS

Alternative 1 (No Action)

Under Alternative 1 (No Action), no Land Use Code changes would occur. Existing houses on single-family lots would continue to be torn down and rebuilt and new ADUs would be constructed at their current rates. The 10-Year Scenario above illustrates:

- 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

Alternative 2

The 10-Year Scenario above for Alternative 2 shows the following outcomes:

- 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
- 1 lot with an AADU where the main house is retained
- 1 lot with a DADU where the main house is retained
- 1 lot with an AADU and a DADU where the main house is retained
- 54 lots with no changes

Alternative 3

The 10-Year Scenario above for Alternative 3 shows the following outcomes:

- 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
Aesthetics

Alternative 1 (No Action)  Alternative 2  Alternative 3

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. If a concentration of ADUs arose in a particular 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, helping retain the overall aesthetic character of neighborhoods in the study area.

The aesthetics impacts from Alternative 3 would be very similar, but slightly less than, those described under Alternative 2 since slightly fewer ADUs would be constructed.

MAXIMUM HEIGHT

Under current regulations, the maximum height limit for DADUs varies by the width of its lot and ranges from between 15 to 23 feet. Alternatives 2 and 3 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. In Alternative 2, 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.

Combined with an increase in the maximum gross floor area limit, taller DADUs would create an increase in bulk and scale. However, because building heights would increase by three 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, impacts from shading would be minimal. In addition, building setbacks would still apply, alleviating shadowing of adjacent properties.

MAXIMUM FLOOR AREA RATIO

Currently, development in single-family zones is not subject to a floor area ratio (FAR) limit. Instead, the size of new houses in single-family zones is governed by yard requirements, a maximum height limit, and an overall lot coverage limit. Alternative 3 would limit new houses to half the lot size or 2,500 square feet, whichever is greater. This would tend to reduce the size of new houses and their aesthetic impacts to bulk and scale. An FAR limit would reduce teardowns by limiting the size (and therefore value) of new houses and could encourage ADUs because floor area in basement apartments and DADUs would be exempt.
**Parking and Transportation**

**Parking.** 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.

**Transportation.** 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 Seattle 2035 Comprehensive Plan EIS.

### PARKING ANALYSIS

To analyze potential impacts from the proposal, we selected four study locations that provide a representative sample of neighborhoods where ADUs could be constructed. 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.

Our analysis focused on unrestricted parking spaces and their utilization. In residential areas, peak parking demand usually occurs overnight on a weeknight, so we used weekend overnight parking data to estimate parking utilization. We evaluated the potential parking impacts by comparing the existing availability of on-street parking with the expected increase in demand for on-street parking under each alternative. We first estimated the vehicle ownership rates for residents in ADUs, then used the results of the housing analysis to determine the expected number of new ADUs in the study locations. We assumed each vehicle would park on the street and evaluated the resulting change in parking availability.

### IMPACTS ANALYSIS

We do not expect increased parking demand resulting from ADU production to exceed existing on-street parking availability under typical conditions. There could 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.

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 or Alternative 3. The 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.

### 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.

### PARKING RESULTS BY STUDY LOCATION

<table>
<thead>
<tr>
<th>Study Location</th>
<th>ADUs produced</th>
<th>Vehicles added</th>
<th>Existing Conditions</th>
<th>After ADU Production</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Spaces available</td>
<td>Parking utilization</td>
</tr>
<tr>
<td>North Study Location</td>
<td>Alternative 1</td>
<td>34</td>
<td>39</td>
<td>1,140</td>
</tr>
<tr>
<td></td>
<td>Alternative 2</td>
<td>68</td>
<td>78</td>
<td>1,140</td>
</tr>
<tr>
<td></td>
<td>Alternative 3</td>
<td>51</td>
<td>59</td>
<td>1,140</td>
</tr>
<tr>
<td>Southeast Study Location</td>
<td>Alternative 1</td>
<td>4</td>
<td>5</td>
<td>72</td>
</tr>
<tr>
<td></td>
<td>Alternative 2</td>
<td>8</td>
<td>10</td>
<td>72</td>
</tr>
<tr>
<td></td>
<td>Alternative 3</td>
<td>6</td>
<td>8</td>
<td>72</td>
</tr>
<tr>
<td>Southwest Study Location</td>
<td>Alternative 1</td>
<td>24</td>
<td>24</td>
<td>1,311</td>
</tr>
<tr>
<td></td>
<td>Alternative 2</td>
<td>48</td>
<td>49</td>
<td>1,311</td>
</tr>
<tr>
<td></td>
<td>Alternative 3</td>
<td>36</td>
<td>37</td>
<td>1,311</td>
</tr>
</tbody>
</table>

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.
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.

**IMPACTS**

Alternatives 2 and 3 could result in 1,440 or 1,210 additional ADUs, respectively, between 2018 and 2027 compared to Alternative 1 (No Action). Population change from additional residents on lots with ADUs in single-family zones could be important, with growth considered in the Comprehensive Plan EIS. The Comprehensive Plan EIS considered the potential impacts of 8,400 new households in 2035 in areas outside urban villages. Since the study area, potentially affected resources, and timeframe for this ADU EIS all fall within what was considered in the Comprehensive Plan EIS, we considered the estimated increase in households from the ADU proposal and evaluated the impacts in the context of the changes analyzed in the Comprehensive Plan EIS.

**METHODOLOGY**

We considered possible changes in population under each alternative relative to the existing service levels for each public service and utility. For stormwater impacts, we consider 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, considering the population growth evaluated in the Comprehensive Plan EIS.

In 2016, the average household size in Seattle was 2.12 people and 2.74 people for households in one-unit structures (detached or attached). 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. 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, the maximum household size would be eight unrelated people for lots with up to one ADU and 12 unrelated people for lots with an ADU 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, which shows an average of 1.36 people 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 evaluated the population change resulting 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, 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. We also considered a scenario where every lot reaches the maximum household size.

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**SEWER AND STORMWATER**

None of the alternatives contemplates a change to the existing maximum lot coverage limit (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 and 2016 Seattle Stormwater Manual have both adopted best management practices to address potential impacts. During the scoping period, SPU reported that the ADU proposal would be unlikely to lead to increased amounts of impervious surfaces beyond what is currently allowed and, therefore, would not have a measurable impact on the drainage system.

**PUBLIC SCHOOLS**

We do not anticipate that additional ADU residents between 2018 and 2027 would have an adverse impact on the enrollment capacity of Seattle Public Schools (SPS). 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 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, or pursuing future capital programs.