

5 Responses to Comments

This chapter provides responses to public comments provided on the Draft EIS during the comment period. The Draft EIS was published on May 10, 2018, with a 45-day comment period. The written comments we received are available in Appendix D. We held a Draft EIS public open house and hearing on May 31, 2018. Appendix E provides verbal and written comments received at the public hearing.

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5.1 Organization of Public Comments

Many comments we received on the Draft EIS address common issues and themes. We first provide responses to these frequent comments in Section 5.2. Responses to individual comments often reference these responses to frequent comments.

Subsequent sections include responses to individual comments received in written form via email, the online comment form, and letter. These comments are organized in alphabetical order by last name.

For comments asking questions, requesting clarification or corrections, or concerning the Draft EIS analysis, we provide responses that explain the EIS approach, offer corrections, identify where we have supplemented the Draft EIS analysis, or provide other appropriate replies. We acknowledge comments expressing an opinion, a preference, or general support or opposition to the proposed Land Use Code changes with a response indicating that we have noted the comment.

5.2 Responses to Frequent Comments

Exhibit 5-1 Summary of Frequent Comment Topics

Topic	Description of comments
Request for greater flexibility than contemplated in Alternative 2 or 3	Proposal should include policies like eliminating the minimum lot size requirement, allowing two or three ADUs on a single lot, increasing the maximum ADU size to 1,500 square feet, or removal of other regulations.
Individual neighborhood review	Each single-family neighborhood in Seattle is unique. The EIS does not consider the unique characteristics of each neighborhood in its analysis of potential impacts. Impacts to each neighborhood should be examined individually.
Impacts to water, drainage, and sewer systems	There will be impacts to the water, sewer and stormwater, and drainage systems due to the proposal.
Housing affordability	The proposal does not have an impact on housing affordability.
Proposal provides insufficient housing options	The proposal should go further than encouraging ADUs to address Seattle's housing shortage.
Multifamily zoning	The proposal would allow multifamily residential uses (e.g., triplexes) on all lots in single-family zones.
Estimates of ADU production and single-family teardowns	The EIS underestimates the number of ADUs that would be created and single-family houses that would be demolished under the proposal.
Parking impacts	The EIS underestimates how the proposal would affect parking availability. The analysis does not adequately address impacts to on-street parking and ignores conditions in denser, more central neighborhoods.
Tree canopy impacts	The EIS underestimates impacts on tree canopy and vegetation.
Short-term rentals	Some or all ADUs will be used as short-term rentals through platforms like Airbnb or VRBO.
King County sewage treatment capacity charge	The King County sewer capacity charge is too high for DADUs.
Permit fees	The City should waive or reduce permit fees for ADUs.
Other barriers to ADU development	Land Use Code changes are insufficient to reduce the barriers owners face to creating ADUs.
Positive impacts	The EIS does not include sufficient discussion of the positive impacts of the proposal.

REQUEST FOR GREATER FLEXIBILITY THAN CONTEMPLATED IN ALTERNATIVE 2 OR 3

Proposal should include policies like eliminating the minimum lot size requirement, allowing two or three ADUs, increasing the maximum ADU size to 1,500 square on a single lot feet, or removal of other regulations.

As described in Section 1.2, Proposal Objective, the proposed action evaluated in this EIS is intended to remove regulatory barriers to the creation of ADUs and increase the number and variety of housing choices available in Seattle's single-family zones. While further Land Use Code changes beyond those contemplated in Alternative 2, Alternative 3, or the Preferred Alternative analyzed in this Final EIS could advance the second of those two objectives by allowing even greater housing production, the first objective calls for strategies to promote *accessory dwelling units*. Therefore, changes suggested in Draft EIS comments that would effectively allow creation of new *principal dwelling units*, such as modifying the minimum size for subdividing land in single-family zones to create new lots or rezoning to Residential Small Lot (RSL), are outside the scope of this proposal.

Some Draft EIS comments suggested further changes to encourage accessory units specifically. A few of these suggestions have been incorporated as features of the Preferred Alternative. We carry forward the floor area ratio (FAR) limit studied in Alternative 3, which would encourage ADU creation, address concerns about the scale of new single-family development, and reduce demolition of principal structures. Likewise, in addition to an AADU and a DADU, the Preferred Alternative would allow two AADUs on a lot.

Other comments called for policies we have not incorporated in the Preferred Alternative. The action alternatives considered in this EIS primarily resemble draft legislation that the City Council developed in 2015, which was intended to address the most frequently cited regulatory barriers to ADU development. Since that draft, we have incorporated additional changes for consideration in the EIS based on public input. The Preferred Alternative reflects a range of perspectives on ADUs, including concerns raised during the scoping process for this EIS and comments received on the Draft EIS. As one example, while eliminating the minimum lot size for a DADU could remove a regulatory barrier to creating housing, we also hear concerns about greater bulk or density on small lots. For the Preferred Alternative, we considered multiple factors, including the

critical need for housing in Seattle, the existing context and pattern of development in the study area, and concerns about privacy and the scale of development in single-family zones.

The City can consider implementing other changes to the Land Use Code beyond the Preferred Alternative as part of a separate proposal that will have its own environmental review process. The analysis in this EIS could inform future environmental review.

INDIVIDUAL NEIGHBORHOOD REVIEW

Each single-family neighborhood in Seattle is unique. The EIS does not consider the unique characteristics of each neighborhood in its analysis of potential impacts. Impacts to each neighborhood should be examined individually.

This EIS is a programmatic environmental impact statement. SEPA does not require that the City prepare separate analyses or documents for each ADU constructed. This EIS uses an appropriate level of analysis to evaluate the effects of a broad proposal that may include numerous individual projects, implemented over a long timeframe, and/or across a large geographic area.

For programmatic proposals, including areawide zoning and land use changes like the proposed action, SEPA Rules require only that an EIS contain a general discussion of the impacts of alternative proposals for plans, land use designations, or implementation measures. SEPA does not require site-specific analyses for individual geographic areas (WAC 197-11-442[3] and [4]). Therefore, analyzing impacts of the proposed Land Use Code changes at a broader scale is appropriate.

To understand the effects of this broad proposal, the EIS contains substantial information and analysis about, and based on review of, generalized variations among individual neighborhoods, subareas, and parcels. While these analyses do not specifically review every possible individual scenario, they provide sufficient information to understand the types and magnitude of impacts that could result in a broad range of cases. The highest and best use analysis in Section 4.1, Housing and Socioeconomics, relies on pro formas that consider varying market conditions by neighborhood area (see Exhibit 4.1-10). We developed and used a parcel typology that accounts for variation in parcel characteristics across the study area (see Exhibit 4.1-11). We present the frequency of these parcel types in each single-family neighborhood, so findings

that vary by parcel type can be understood in the context of actual neighborhood conditions (see Exhibit A-23).

The parking analysis also considers differing neighborhood-level conditions. We used empirical data on parking utilization and availability gathered through parking studies in four representative neighborhoods (see Exhibit B-1). The transportation section identifies unimproved sidewalks across the entire study area (see Exhibit 4.4-6). We present the existing transit network and illustrate areas of Seattle according to their proximity to frequent transit (see Exhibit 4.4-10, Exhibit 4.4-11, and Exhibit 4.4-12).

The aesthetics analysis similarly examines the proposal's likely effects on a range of parcel configurations. This includes considering various parcel sizes, location on the block (e.g., an interior lot or corner lot), and whether the parcel does or does not have alley access.

Chapter 3, Housing and Planning Context, discusses and presents several exhibits that illustrate the variation in cultural, economic, and social conditions across Seattle. In particular, Exhibit 3-12 shows population by race, and Exhibit 3-15 shows housing tenure across the city. Exhibit 4.1-16, Exhibit 4.1-18, and Exhibit 4.1-19 present further information about demographic and socioeconomic variation across neighborhoods in the study area.

IMPACTS TO WATER, DRAINAGE, AND SEWER SYSTEMS.

There will be impacts to the water, sewer and stormwater, and drainage systems due to the proposal.

Section 4.5, Public Services and Utilities, discusses how City and County utilities plan for population growth and the potential effects of additional ADU production and resulting population increase on the availability of public services and utilities. The review in the EIS of water, drainage, and sewer systems suggests that no significant impacts are likely to result from the 2,460 additional ADUs anticipated under the Preferred Alternative compared to Alternative 1 (No Action).

Even during a period of historic growth in Seattle, total usage of the water system has declined in recent years, in part due to conservation efforts like encouraging low-flow fixtures in new development. Seattle's water system currently has excess capacity. Seattle Public Utilities (SPU) develops long-range plans for maintaining and upgrading the water system based on growth forecasts from the Puget Sound Regional Council

(PSRC) and Washington State Office of Financial Management (OFM). While concentrated ADU production in a particular area could increase demand on localized parts of the water supply and distribution systems, they have sufficient excess capacity currently to withstand the additional population anticipated under the Preferred Alternative, as described in Section 4.5.2.

Water conservation measures have also led to a reduction in discharges to the sanitary sewer. For that reason, the Preferred Alternative would generally not be expected to exceed the total design assumptions for sanitary waste (which assumes no water conservation) in residential zones. After reviewing the alternatives evaluated in this EIS, SPU concluded that increased sewer demand resulting from ADU construction will not substantially impact sewer capacity.

SPU also designs and maintains drainage systems based on assumptions about the type and amount of developed land cover and characteristics of weather events like frequency, duration, and intensity. Future weather events are constant across all alternatives. All alternatives also share the same maximum lot coverage limit; no change to this standard is contemplated under any alternative. From its review, SPU concluded that consistency with existing lot coverage regulations suggests that none of the alternatives would result in increased area of impervious surfaces beyond what is already allowed under single-family zoning. SPU therefore found that none of the alternatives is likely to have a measurable impact on the drainage system.

HOUSING AFFORDABILITY

The proposal does not have an impact on housing affordability.

As described in Section 1.2, the objectives of the proposed Land Use Code changes are to remove regulatory barriers to make it easier for property owners to permit and build ADUs and to increase the number and variety of housing choices in single-family zones. Section 4.1, Housing and Socioeconomics, describes how the proposal could also have slight benefits for housing affordability by increasing housing supply, increasing the number of smaller homes available, increasing income for homeowners operating ADUs as rentals, and reducing the number of existing homes demolished compared to Alternative 1 (No Action).

The terms *affordable housing* and *housing affordability* are used in both formal and informal contexts, and definitions can vary greatly.

Generally, *affordable housing* refers to housing (often with income and rent restrictions) that a lower-income household can afford. *Housing affordability* refers to a broad set of issues and actions related to the relationships among housing production costs, housing prices, and local demographic needs.

Two types of affordable housing exist: regulated affordable housing and private market affordable housing. Regulated affordable housing typically relies on public subsidy, targets households with incomes at a particular level, and has legally restricted rents or sales prices to provide affordability for those households. Regulated affordable housing can be publicly or privately (i.e., non-profit and for-profit) owned and found in a wide range of neighborhoods and building types. In all cases, creating affordable housing requires proactive public policy and/or investment. Private market affordable housing (or low-cost market-rate housing) is provided at an affordable price on the open market without subsidy or legal restriction.

Housing affordability is typically measured as the relationship between housing price and household income. An affordable home is one a household can afford and have sufficient remaining income for basic needs like transportation, food, and healthcare. A common definition for affordability is housing whose monthly costs do not exceed 30 percent of household income. Housing affordability is therefore a function of income and housing costs for each individual household, which can vary substantially given the unique circumstances of a household and housing unit.

Median household income is a standard measure of income that varies by geography and household size and comes from U.S. Census Bureau data. For programs it administers, the Department of Housing and Urban Development (HUD) establishes median household income thresholds based on household size. In Seattle, for example, using these HUD guidelines, the Office of Housing considers \$1,505 to be affordable rent for a one-bedroom unit for a household whose income is 80 percent of the area median income (AMI). For a household with an income of 30 percent of AMI, the affordable rent for a one-bedroom unit is \$563.

ADU production analyzed in this EIS represents market-rate units, with rents set by the property owner. This EIS does not analyze the creation of rent- and income-restricted ADUs. (See Section 3.2 for information on separate City efforts to support equity and affordability through ADUs.) Some ADUs might provide relatively lower-cost housing choices in the study area. ADU rental rates tend to be lower due to the characteristics

of the units (e.g., small size). ADU rents are generally determined by what tenants are willing to pay, not by the property owner's cost to build the unit. Development cost is often an important factor in the decision of whether to build an ADU, but it generally does not determine rent. A 2014 study by the Oregon Department of Environmental Quality of ADUs in Portland, Oregon, found median rent for attached and detached ADUs is slightly below Portland's median rent for studio, one-bedroom, and two-bedroom apartments. Our survey of Seattle ADUs listed on Craigslist in October–November 2017 found an average monthly rent for one-bedroom unfurnished ADUs of \$1,420, 14 percent lower than the citywide average of \$1,645.¹

Even when their rents are not affordable to low-income households, ADUs contribute to housing goals by increasing the overall supply of housing in Seattle and the number of housing choices available in single-family zones specifically. These additional housing options allow more people to access Seattle neighborhoods and help to address the scarcity that pushes housing prices upward.

ADUs can also allow homeowners to generate rental income that offers financial stability. An ADU can provide housing for a family member whom a homeowner otherwise supports by paying for rent elsewhere. The ADU might house a family member or caregiver who provides childcare or other services that offer value to the homeowner. Nevertheless, as the EIS acknowledges in Section 4.1.2, high construction costs mean that most households able to create an ADU are disproportionately wealthy or have access to substantial equity in their home. This phenomenon will likely persist absent other actions beyond Land Use Code changes to reduce costs and support lower-income households. As described in Section 3.2, Planning Context, the City is considering such programmatic strategies for advancing equity and affordability goals through ADUs.

PROPOSAL PROVIDES INSUFFICIENT HOUSING OPTIONS

The proposal should go further than encouraging ADUs to address Seattle's housing shortage.

Seattle currently suffers from an acute housing shortage of both market-rate and income-restricted affordable housing. Numerous measures discussed in Section 4.1, Housing and Socioeconomics, illustrate the

¹ Citywide average from Costar for one-bedroom units, Q4 2017.

degree of the housing crisis: More than one-third of Seattle households pay 30 percent or more of their income on housing costs. Ninety-two percent of single-family rentals are unaffordable to households earning 80 percent of the area median income. Income, homeownership, and wealth all present disparities by racial and ethnic group.

As described in Section 3.2, Planning Context, the City is currently exploring strategies beyond Land Use Code changes to support ADU production and affordability goals. The City is also pursuing other actions related to housing affordability beyond encouraging ADUs, many of them identified in the 2015 recommendations of the Housing Affordability and Livability Agenda (HALA) Advisory Committee, such as implementation of Mandatory Housing Affordability (MHA) requirements for new development.

Under all alternatives studied in this EIS, however, housing affordability will likely continue to be a challenge for many current and prospective Seattle residents, especially for lower-income households and renter households, and especially in the study area for this EIS. While the additional ADU production anticipated under the Preferred Alternative would create new housing choices and reduce upward pressure on housing costs compared to Alternative 1 (No Action), other actions — including land use changes in the study area, investments in rent- and income-restricted housing, and programmatic strategies to support lower-income homeowners and renters — are likely necessary under any alternative to address Seattle's housing challenges fully.

MULTIFAMILY ZONING

The proposal would allow multifamily residential uses (e.g., triplexes) on all lots in single-family zones.

As described in Chapter 2, Alternatives, Alternative 1 (No Action) represents current regulations for development in Seattle's single-family zones. Under today's existing rules, all lots in single-family zones can have an ADU. A lot can have either an attached ADU or, depending on lot size, a detached ADU. The Preferred Alternative would allow two ADUs on one lot and would modify the minimum lot size required for a DADU.

The Land Use Code (i.e., Title 23 of the Seattle Municipal Code) includes specific definitions for "Residential use." Under this definition, a "single-family dwelling unit" means a detached structure that has a permanent foundation, contains one dwelling unit, plus its associated authorized

accessory dwelling unit or detached accessory dwelling unit. In other words, the code considers an ADU to be part of the single-family dwelling unit. (As part of the proposed action evaluated in this EIS, we would amend this definition to encompass a principal dwelling unit and one or two ADUs.) By contrast, "multifamily residential use" means a use consisting of two or more principal dwelling units in a structure or portion of a structure, excluding accessory dwelling units. A "dwelling unit" is a room or rooms occupied by one household as living accommodations.

These terms thus differentiate a lot in a single-family zone with one or two accessory dwelling units from multifamily uses comprising two or three principal dwelling units. The latter are typically called "duplexes" and "triplexes," which the code defines, respectively, as a single structure containing only two dwelling units, neither of which is an accessory dwelling unit, and a single structure containing three dwelling units.

How is a lot with an ADU different from a building with multiple principal dwelling units? Aside from definitions in the code, certain land use regulations further distinguish multifamily development from the type of development allowed in single-family zones under the Preferred Alternative. First, ADUs have size limits that do not apply to principal dwelling units. The Preferred Alternative would restrict ADUs to 1,000 square feet, while single-family homes and multifamily housing types like townhomes and apartments generally have no size limit (though the Preferred Alternative would limit the size of a single-family home to 2,500 square feet or half the lot size, whichever is greater). Second, rules for land division differ in single-family and multifamily zones. Minimum lot sizes regulate subdivision in single-family zones, while multifamily zones generally have no minimum lot sizes. This means that, in a single-family zone, a 5,000-square-foot lot with a DADU cannot be divided into two lots and separately owned. In a multifamily zone, a 5,000-square-foot lot could be divided into multiple lots, each sold to a separate owner. Third, a lot in a single-family zone, with or without ADUs, can be occupied by only one household, defined as any number of related people or up to eight unrelated people; the Preferred Alternative would allow a household comprising 12 unrelated people on a lot with two ADUs. In a multifamily development, however, each unit can contain a household; a duplex and triplex, therefore, can contain two and three households, respectively, or up to 16 and 24 unrelated people.

ESTIMATES OF ADU PRODUCTION AND SINGLE-FAMILY TEARDOWNS

The EIS underestimates the number of ADUs that would be created and single-family houses that would be demolished under the proposal.

We are not aware of any other empirically based estimates of ADU production or demolition of single-family houses that would provide a basis for asserting that the approach used in this EIS categorically underestimates those figures. The methodology used in this EIS and described in Section 4.1, Housing and Socioeconomics, and Appendix A draws on the most current permit data and represents a reasonable approach using the best available information to estimate ADU production. It incorporates empirical data about past development events; applies econometric methods to analyze the parcel-level factors that predict ADU production; considers the effects of regulations under each alternative; and includes conservative adjustments to account for new policies not reflected in available parcel data, such as allowing two ADUs on one lot. Some barriers to ADU development exist outside Land Use Code regulations, like the cost to construct an ADU. While proposed City programs to reduce DADU construction costs are independent of this proposal, the Final EIS considers DADU construction cost reductions to ensure our impacts analysis is based on our best estimate of future conditions.

Section 4.1, Housing and Socioeconomics, describes the forecast model we use to estimate the number of ADUs and single-family teardowns we could expect under each alternative. In brief, the model (1) analyzes historical development data to discern the factors and characteristics associated with ADU creation and single-family teardowns, (2) develops a baseline forecast for Alternative 1 (No Action) by updating underlying variables for the 2018-2027 period to match regional growth projections, and (3) develops forecasts for each action alternative by modeling its Land Use Code changes. We then apply adjustment factors that further increase the estimates of ADU production to account for factors not included in the forecast model. Section 4.1, Housing and Socioeconomics, and Appendix A describe this methodology in greater detail. In this Final EIS, this methodology yields 10-year estimates of 1,970 to 4,430 ADUs and 2,030 and 1,580 demolitions of principal structures for Alternative 1 (No Action) and the Preferred Alternative, respectively.

While we expect more ADUs under all action alternatives compared to Alternative 1 (No Action), we also anticipate the number of teardowns would decrease. This occurs for multiple reasons. First, as noted in the description of the forecast model and its results on page 4-18, empirical permit data suggests that property owners tend to decide between adding an ADU and tearing down and rebuilding a house. Therefore, regulatory changes that increase the relative feasibility of ADU development also increase the likelihood that property owners in the future decide to create an ADU instead of demolishing the house. In other words, flexibility for creating ADUs gives homeowners more options to use their land and meet their changing household needs in place, rather than selling and/or tearing down the house. Second, Alternative 3 and the Preferred Alternative both include an FAR limit that would lower the maximum allowed size of new single-family houses. This reduces the incentive to demolish an existing house in order to build a new house because that new house cannot be as large as allowed under Alternative 1 (No Action).

SEPA requires consideration of probable impacts, defined in WAC 197-11-782 as likely or reasonably likely to occur. SEPA does not require consideration of every remote and speculative consequence of an action (RCW 43.21C.110). By using an appropriate methodology for estimating real estate feasibility and best available data for forecasting future ADU production, this Final EIS evaluates the likely outcomes for each alternative.

PARKING IMPACTS

The EIS underestimates how the proposal would affect parking availability. Impacts to on-street parking are not adequately addressed and ignores conditions in denser, more central neighborhoods.

Section 4.4 describes our methodology for analyzing potential parking impacts likely to occur under each alternative. The analysis relies on and is consistent with the ADU production estimates developed for the housing and socioeconomics analysis and described in Section 4.1, Housing and Socioeconomics. In brief, we compare the existing availability of on-street parking with the expected increase in demand for on-street parking in each alternative. The increase in demand reflects the ADU production rates expected for the 2018-2027 period and estimates of vehicle ownership rates for ADU residents. Finally, we use empirical parking data collected in four study locations throughout Seattle to

identify potential impacts and evaluate the extent to which impacts from the action alternatives could vary geographically. Section 4.4, Parking and Transportation, and Appendix B describe this methodology in greater detail.

The findings in Section 4.4 conservatively evaluate how the proposal would affect on-street parking availability. While the ADU production estimates in Section 4.1, Housing and Socioeconomics, indicate that the percentage of parcels with ADUs would vary according to several variables, we conservatively use the upper end of this range to evaluate parking availability in each study location. Likewise, we assume that all ADU residents would park on the street, even though some alternatives require off-street parking for new ADUs, and even though some property owners might have existing parking spaces or elect voluntarily to create one even if not required. Further, this Final EIS discloses that, if a particular block has a concentration of ADUs and/or if currently parking utilization is particularly high, localized impacts on parking availability could occur.

The four study locations are identified in Appendix B. We chose these locations to examine different geographic areas of Seattle and to represent a range of conditions found in single-family zones, including lots of various sizes; blocks with and without alleys, driveways, and sidewalks; and various levels of transit service. Many areas outside these study locations resemble the conditions found within the study locations. Please see Exhibit B-3 through Exhibit B-14, which provide maps of each parking study location, illustrate the distribution of lot sizes in each study location, and compare this distribution to the EIS study area overall. In general, the parking study locations represent a range of conditions in terms of lot sizes, resembling conditions found in the entire EIS study area. To the extent that there are areas distinctly different than the study locations, the EIS discloses that, within a specific context or location, localized impacts on parking availability could occur.

TREE CANOPY IMPACTS

The EIS underestimates impacts on tree canopy and vegetation.

The land use analysis in Section 4.2, Land Use, includes information and analysis related to tree canopy and vegetation. Based on feedback on the Draft EIS, this Final EIS includes several additions to this analysis. We added Exhibit 4.2-8 to show tree canopy coverage in the study area based on the most current data available. Using a 2016 LiDAR

dataset, we compared average tree canopy coverage on study area parcels with DADUs, without DADUs, and with new single-family houses constructed since 2010. We also added more description of current tree regulations from Chapter 25.11 of the Land Use Code, and information about proposed updates to Seattle's tree policies that the City Council is currently considering.

The Preferred Alternative analyzed in this Final EIS also incorporates several features intended to minimize potential impacts on tree canopy and vegetation. The proposed increase in the rear yard coverage limit for a one-story DADU would be allowed only if DADU construction does not result in tree removal. Flexibility in the rear yard requirement would allow property owners to site DADUs in a way that eliminates or minimizes impacts on trees. The City will also clarify the requirement that site plans submitted with ADU permit applications must show the location of trees on the lot so that permit reviewers can consider tree impacts. Creating an off-street parking space often involves converting a vegetated part of one's property into an impervious surface. Removing the off-street parking requirement could reduce the amount of tree canopy and vegetation otherwise needed to accommodate a parking space.

SHORT-TERM RENTALS

Some or all ADUs will be used as short-term rentals through platforms like Airbnb or VRBO.

In 2017, the City Council enacted new regulations for short-term rentals. In Section 3.2, Planning Context, we describe this recent legislation in more detail. The short-term rental regulations allow a licensed short-term rental operator to offer one dwelling unit as a short-term rental, or two dwelling units if one is the operator's primary residence. Currently, in single-family zones, an operator could offer both the main house and an ADU as short-term rentals only if one is the operator's primary residence. Under the Preferred Alternative, a lot could have two ADUs. Seattle's short-term rental regulations would not allow the main house and both ADUs to be used as short-term rentals. Further, if the owner does not occupy the house or ADU, only one unit could be offered as a short-term rental.

The housing analysis described in Section 4.1, Housing and Socioeconomics, considers these regulations when comparing various ways to value development outcomes on a single-family lot under each alternative. In addition to the limits established in the short-term rental regulations, we evaluated whether offering an ADU as a short-

term rental was likely to be more profitable than as a long-term rental. (See Appendix A for details on the methods used to evaluate different valuation options, including short-term rentals.) Exhibit A-28, Exhibit A-33, Exhibit A-38, and Exhibit A-43 show that, across all alternatives, it is generally more profitable to rent an ADU as a long-term rental. This is true for all three market areas and all four parcel prototypes we evaluated. While the results of this valuation analysis do not mean that *no* homeowners will choose to use their ADU as a short-term rental, they suggest that short-term rentals are not likely to be the most profitable way that property owners can use their ADUs. (Some property owners will nonetheless choose to offer their ADUs as short-term rentals for reasons of preference or flexibility, as is true of owners of single-family houses.) Further, the results suggest that the action alternatives do not increase the likelihood that ADUs in Seattle would be used as short-term rentals compared to Alternative 1 (No Action).

KING COUNTY SEWAGE TREATMENT CAPACITY CHARGE

The King County sewer capacity charge is too high for DADUs.

Since 1990, King County has levied a capacity charge on structures with new connections to the sanitary sewer system. Property owners in Seattle and other cities in King County establishing a DADU are required to pay this charge, which in 2018 amounts to \$11,268 paid monthly for 15 years. Currently, a new DADU and a new single-family residence receive the same capacity charge.

We include this fee in our pro forma analysis as one of several cost inputs for new ADUs or single-family houses. In the Draft EIS, Alternative 2 considered a reduction of 10 percent in predevelopment costs for DADUs. Although we applied a 10-percent reduction to costs including the King County sewage treatment capacity charge, this reduction did not reflect a specific proposal to lower costs. Rather, it represented a theoretical reduction that could be implemented through various mechanisms or actions that helped us understand how ADU production might increase. In this Final EIS, all alternatives incorporate a cost reduction based on ongoing City efforts to develop pre-approved plans and other potential actions to reduce cost.

Because the City does not administer this charge or control its rate structure, the City cannot unilaterally or independently modify its application or the fee charged as part of developing an ADU. However, in 2017 King County began a comprehensive review of how its capacity

charge is allocated to newly connecting customers. While the amount of the charge has been updated continually over time, the way it is allocated to different building types has not been evaluated since 1990. Since then, new building types have emerged that use water in different ways, including AADUs and DADUs. As a result, the County is conducting a study on how the capacity charge is allocated to different building types with the goal of graduating the charge to reflect the amount of wastewater that each type of building tends to discharge.

When we issued this Final EIS, the County had formed and was working with a Capacity Charge User Classification Work Group for this study. Seattle Public Utilities is part of this group. Through conversations with builders and other stakeholders and by reviewing data from several local agencies, the working group is evaluating which features reflect the amount of wastewater a building's occupants will eventually generate. These features include square footage, number of bedrooms, number of plumbing fixtures, water meter capacity, and unit type. Currently, the capacity charge for residential development is based solely on the number of units.

Through a separate study, King County is also exploring assistance for low-income customers. The County expects to share findings from both studies in late 2018 or early 2019.

PERMIT FEES

The City should waive or reduce permit fees for ADUs.

A fee is required to apply for a permit to establish an ADU. The cost of the permit depends on the size and complexity of the project, how long it takes to review, and additional permits that might be required.

Waiving or reducing permit fees for a certain project type would require that the City's general fund resources be used to subsidize the permits for those projects. Because Seattle Department of Construction and Inspections (SDCI) permit staff must review an ADU application, waiving the associated fee means that General Fund revenue needed to support other City services would pay for the review.

Permit fees are based in part on the time required to review the application, however. Therefore, efforts to reduce permitting time in turn reduce permit fees. As described in Section 3.2, Planning Context, the City is exploring options for developing standard DADU designs that SDCI permitting staff would review and pre-approve. Homeowners interested

in creating a DADU could save time and money by using a pre-approved plan due to a faster plan review process and reduced permit fees.

OTHER BARRIERS TO ADU DEVELOPMENT

Land Use Code changes are insufficient to reduce the barriers owners face to creating ADUs.

Regulatory barriers are just one of several factors constraining ADU production. Other barriers include high construction costs; the challenge of obtaining financing and the limited number of financing tools available for ADUs; the duration and complexity of the permitting process; managing a construction project; and operating a rental unit. Efforts to address some of these other barriers are underway. Section 3.2, Planning Context, describes several programmatic strategies the City is exploring to reduce barriers beyond changes to Land Use Code regulations.

The City is exploring options for developing pre-approved DADU designs that could streamline the permitting process and save time and money for homeowners. New resources and tools could help homeowners explore DADU designs and understand the feasibility of adding an ADU to their property. A programmatic or financial partnership between the City and a nonprofit lender or other organization could improve access to ADU financing for homeowners. Likewise, innovation in the private sector could lower construction costs, or simplify the development and tenanting process for homeowners.

As described in the response above related to how we estimate the number of ADUs in each alternative and in Section 4.1, Housing and Socioeconomics, the ADU production estimates reflect reasonable assumptions about potential cost reductions that could increase the number of ADUs created under each alternative.

POSITIVE IMPACTS

The EIS does not include sufficient discussion of the positive impacts of the proposal.

SEPA requires that an agency prepare an EIS for proposals likely to have significant adverse impacts on the environment. Consistent with SEPA, the analysis in the EIS focuses on the environmental resources most likely to be impacted by the proposal as identified during the scoping period and in the Hearing Examiner's decision from December 2016.

Nevertheless, several comments on the Draft EIS recommended that we discuss positive impacts of the proposal in greater depth. As appropriate, the positive impacts of the proposal are discussed throughout the EIS; however, SEPA Rules state that the beneficial aspects of a proposal shall not be used to balance adverse impacts in determining significance.

5.3 Responses to Comments Submitted by Email

This section provides responses to Draft EIS comments provided by email. Copies of the email comments we received are available in Appendix D.

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RESPONSES TO COMMENTS SUBMITTED VIA EMAIL

350 Seattle

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response concerning the proposal's positive impacts.
- 3 Thank you for your comment. The comment is noted.
- 4 Please see Chapter 2, Alternatives. The Preferred Alternative would allow at least one ADU; two ADUs would be permitted if the property is under the same ownership for at least one year. Please also see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.
- 5 Please see Chapter 2, Alternatives. The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 6 Please see Chapter 2, Alternatives. The Preferred Alternative would remove the owner-occupancy requirement. A minimum of one year of continuous would be required to establish a second ADU on a lot that already has an ADU.
- 7 The minimum lot size for DADUs in the Preferred Alternative would be reduced from 4,000 square feet to 3,200 square feet. Please also see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.
- 8 Please see Chapter 2, Alternatives. The Preferred Alternative would increase the maximum size of a DADU to 1,000 square feet, excluding storage and parking areas.
- 9 The maximum height for DADUs in the Preferred Alternative would be increased 1-3 feet depending on lot width. Please also see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.
- 10 DADUs can be located in front of the main house if it is outside of the required front yard. Please see Exhibit 2-6 that illustrates required yards in single-family zones.
- 11 Please see the frequent comment response regarding requests for greater flexibility than contemplated in Alternative 2 or 3.
- 12 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative does not include an affordability requirement.
- 13 Please see Chapter 2, Alternatives, for a description of what is included related to reducing costs, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 14 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The proposed FAR limit included in the Preferred Alternative incentivizes production of ADUs by exempting any floor area in an ADU (both attached and detached).

Abolins, Talis

- 1 Please see Section 4.2, Land Use. This section has been updated to include a discussion of historic resources.
- 2 The proposal in this EIS to revise the Land Use Code related to accessory dwelling units is unrelated to the adoption of MHA as analyzed in the [MHA EIS](#).

Aderhold, Eric

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes removing the off-street parking requirement and removing the owner-occupancy requirement.
- 3 Please see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.
- 4 Please see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.
- 5 Please see Chapter 2, Alternatives, for a discussion of what is studied in the action alternatives. This includes considering an increase in maximum household size.
- 6 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative, including allowing both an AADU and a DADU on the same lot.
- 7 Please see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.

AIA

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative, which includes allowing two ADUs (either two attached or one attached and one detached).
- 3 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. This includes removing the off-street parking requirement.
- 4 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. This includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet.
- 5 The Preferred Alternative includes allowing some additional height for a DADU. Height limits would be one to three feet higher than existing limits, depending on lot width. One to two additional feet would be allowed for a DADU that incorporates green building strategies.
- 6 The Preferred Alternative includes allowing for additional rear yard coverage for a single-story DADU provided construction does not result in tree removal.

- 7 The Preferred Alternative would increase the maximum size of a DADU to 1,000 square feet.
- 8 Please see Chapter 2, Alternatives, for a description of what is included related to reducing costs, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 9 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes exempting floor area in an ADU from the maximum FAR calculations to incentivize ADUs and allows for some additional height for DADUs that incorporate green building features.

Allegro, Justin

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Please see Section 3.2, Planning Context, for added discussion about short-term rentals.

Anderson, David — 1

- 1 Thank you for your comment. The comment is noted.
- 2 The proposal in the Draft EIS pertains to proposed changes to the Land Use Code related to ADUs. Changing the zoning designations within neighborhoods or throughout the city is outside of the scope of the EIS.
- 3 The proposal in the Draft EIS pertains to proposed changes to the Land Use Code related to ADUs. Changing the zoning designations within neighborhoods or throughout the city is outside of the scope of the EIS.

Anderson, David — 2

- 1 Thank you for your comment. The comment is noted.
- 2 The proposal in the Draft EIS pertains to proposed changes to the Land Use Code related to ADUs. Changing the zoning designations within neighborhoods or throughout the city is outside of the scope of the EIS.

Bartfield, Esther

- 1 Alternative 1 - No Action, considers impacts from existing regulations; this alternative only allows one ADU. This suggestion would not meet the proposal's objective to increase the number and variety of housing choices in single-family zones and therefore is not included as an alternative in the EIS.
- 2 Please see the frequent comment response regarding individual neighborhood review.
- 3 Please see Section 4.1, Housing and Socioeconomics, for discussion and analysis of the owner-occupancy requirement.

- 4 MHA requirements are considered in the 2017 [MHA EIS](#) and are outside the scope of this EIS. MHA upzoning occurs outside of single family zones and is therefore, not part of the cumulative impact analysis in this EIS.
- 5 See Appendix A for detailed methodology for how we arrived at the conclusions regarding potential teardowns and the frequent comment response on the estimates of ADU production and single-family teardowns.
- 6 Please see the frequent comment response concerning housing affordability.
- 7 Please see the frequent comment response concerning impacts to parking.
- 8 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use. In addition, please see Chapter 2, Alternatives, for a description of lot coverage requirements. As established in Seattle Municipal Code 23.44.010, the maximum lot coverage varies by lot size. For lots under 5,000 square feet, the maximum lot coverage allowed for principal and accessory structures is 1,000 square feet plus 15 percent of lot area. The maximum lot coverage for a lot of any size is not proposed to be changed; adding a DADU to a 3,200-square-foot lot would require that the main house and any other structures on the lot have not already exceeded the maximum lot coverage allowed.
- 9 As described in Section 4.3, Aesthetics, under Alternative 2 the minimum lot size on which an ADU could be constructed would be reduced to 3,200 square feet. The hypothetical two-block scene includes about 20 lots between 3,200 and 3,999 square feet. The primary aesthetic impact of lowering the minimum lot size would be an increase in visual bulk and scale on lots that cannot have a DADU under current regulations. Because houses on lots under 4,000 square feet tend to be smaller, it's also possible that DADUs on such lots would be more visible from the street when compared to larger lots. However, other development standards, such as maximum lot coverage limits, would continue to regulate the location and scale of DADUs. On lots under 4,000 square feet, the maximum lot area that could be covered (equal to 1,000 square feet plus 15 percent of the lot area) would limit the size of DADUs or, in some cases, preclude their construction altogether.
- 10 See Appendix A for detailed methodology for how we arrived at the conclusions regarding potential teardowns and the frequent comment response on the estimates of ADU production and single-family teardowns.
- 11 See Appendix A for detailed methodology regarding parcel types.
- 12 The EIS analyzes how each alternative could affect the maximum residual land value of each combination of parcel type and neighborhood. (Residual land value is the developer's land budget for a particular project. Increases to residual land value indicate the potential for increases in property values.) Please see Section 4.1, Housing and Socioeconomics, and Appendix A for discussion of potential changes to property values under each alternative. We have added additional analysis and discussion of potential property tax implications as part of this Final EIS.

As shown in Exhibit A-44, in higher- and medium-price neighborhoods, the amount a developer could afford to pay for land increases for parcel types C and D, suggesting that property values could increase for those properties. Smaller parcel types (A and B) in higher- and medium-price neighborhoods show minimal changes across the four alternatives. In lower-price neighborhoods, the amount a developer could afford to pay shows only small changes across the four alternatives, suggesting minimal change in property values. As discussed in Section 4.1, Housing and Socioeconomics, risk of displacement is generally higher in lower-price neighborhoods, so those at greatest risk of displacement will generally be less effected by any changes in property values.

However, changes to residual land value do not directly impact property tax bills, for several reasons.

First, we use residual land value to better understand the underlying economics of the ADU provisions contemplated in the EIS. Changes in property valuations (used for tax assessments) will only show up to the extent that the potential for ADU creation results in increased sales prices, which is determined by ADU production rates and individual homebuyer and investor decisionmaking. It is not possible to use the residual land value analysis to directly forecast changes in property tax assessments. Second, actual property tax payments are a function of how properties are valued by the assessor and in conjunction with rules for levying property taxes in the State of Washington. The King County Assessor assesses residential properties each year based on a complex statistical estimate of real market value. This Assessor's estimate relies on recent sales of comparable properties in the neighborhood and does not automatically reflect any changes to estimated residual land value. (In addition, all properties are inspected once every six years). This process is imperfect; in Seattle in 2017, the median appraised value for residential properties was \$528,000, while the median sales price was \$650,000.

Third, a homeowner's property tax bill does not scale proportionately with changes to assessed real market value. This is due to the complexities of Washington State's budget-based property tax system. In Washington, each jurisdiction's annual property tax levy cannot increase by more than 1 percent over the previous year's levy, unless the public votes for a greater increase. Taxes on new construction are exempt from the 1 percent limit. To illustrate this effect, consider the amount of taxes levied by the City of Seattle as part of its general rate (excluding voter-approved measures). Between 2010 and 2016, assessed value within the city increased by 33 percent, or 4.8 percent per year. Over the same period, the City's tax levy increased by 9 percent, or 1.5 percent per year. Holding all else constant (assuming no new construction or voter-approved levies), any assessed value increases over 1 percent per year will result in lowered property tax rates.

Recent increases to Seattle property tax bills are driven primarily by 1) statewide changes in how education is funded and 2) voter-approved measures, not by increased property values. In Seattle, nearly 50 percent of the property tax bill is due to voter-approved measures.

Finally, Washington State provides property tax exemption or deferral programs for people who are seniors, disabled, low-income, or widows/widowers of veterans. These programs are intended to minimize displacement due to property tax increases.

Bellan, Susan

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding individual neighborhood review.

Benjamin, Harriet

- 1 Please contact the Seattle Department of Construction and Inspections for questions related to sewer scope requirements.

Bennett, Jan

- 1 Thank you for your comment. The comment is noted.

Bernard, Barbara

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

Bhakti, Sara

- 1 Thank you for your comment. The comment is noted.

Bloomquist, Al

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

Boris-Brown, Kathryn

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

Borrow, James

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.
- 4 Thank you for your comment. The comment is noted.
- 5 Thank you for your comment. The comment is noted.

Boyd, Marilyn

- 1 Storage space entirely outside ADU would not be included when calculating the size of an ADU. For example, if you have an existing garage where you have storage space on the main level and build a ADU as a second story above the garage and storage, that storage area would not be included in the size calculation for the ADU. This allows people to maintain existing parking and storage areas and add an ADU.

Boyd, Marilyn

- 1 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative, including increasing the size of a DADU to 1,000 square feet.
- 2 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative, including removing the off-street parking requirement for ADUs.
- 3 Please see Chapter 3, History and Planning Context, for a discussion of additional programmatic strategies the City could pursue in addition to and independent of the Land Use Code changes evaluated in this EIS.
- 4 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative does not include an affordability incentive or requirement.
- 5 The ADU EIS pertains to proposed changes to the Land Use Code related to ADUs. Changing zoning designations or allowing for multifamily housing (i.e. duplexes, triplexes, and fourplexes) is outside the scope of this EIS.
- 6 Please see the frequent comment response concerning housing affordability.

Boyd, Robyn

- 1 Thank you for your comment. The comment is noted.

Bradshaw, Liam

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

Brauner, Kal

- 1 Please see the frequent comment response regarding individual neighborhood review.
- 2 Please see the frequent comment response regarding individual neighborhood review.
- 3 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative, which would eliminate the owner-occupancy requirement and Section 4.1, Housing and Socioeconomics, for analysis of removal of the owner-occupancy requirement.

- 4 Please see the frequent comment response regarding parking. Please also see Chapter 3, History and Planning Context, for information added about the City's existing regulations regarding short-term rentals.
- 5 Thank you for your comment. The comment is noted.
- 6 Please see the frequent comment response regarding individual neighborhood review.

Brod, Brooke

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response concerning housing affordability.
- 3 Please see Section 3.3 for a discussion of ADUs permitted between 1994 and 2017. Data on ADUs built without a permit is not available.
- 4 Please see the frequent comment responses related to insufficient housing options and the positive impacts of the proposal.

Cali, Suzanne

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

Campbell, Julie

- 1 As outlined in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would result in the creation of more ADUs under all action alternatives compared to Alternative 1 (No Action). While construction cost certainly impedes construction of additional ADUs, the analysis in the EIS shows that existing regulations also act as a barrier.
- 2 Please see Section 4.1. Additional discussion of the owner-occupancy requirement has been added to Section 4.1, Housing and Socioeconomics, and Appendix A of this Final EIS.
- 3 Thank you for your comment. The comment is noted.
- 4 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. As noted, floor area in an ADU would be exempt to encourage production of ADUs.
- 5 Thank you for your comment. The comment is noted.

Campbell, Julie

- 1 Please see Section 3.2, Planning Context, for added discussion about short-term rentals. See Section 4.1, Housing and Socioeconomics, and Appendix A for discussion of how short-term rentals were considered in the analysis.

Carlson, Amy

- 1 Please see the frequent comment response regarding individual neighborhood review.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative and the owner-occupancy requirement. See Section 4.1, Housing and Socioeconomics, for analysis of removal of the owner-occupancy requirement.
- 3 Please see the frequent comment response regarding parking. Please also see Chapter 3, History and Planning Context, for information added about the City's existing regulations regarding short-term rentals.
- 4 Thank you for your comment. The comment is noted.
- 5 Please see the frequent comment response regarding individual neighborhood review.

Chase, Ronald

- 1 Please see the frequent comment response regarding individual neighborhood review.
- 2 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 3 The same design requirements for neighborhood character in the 2035 Comprehensive Plan would apply to the construction of new ADUs.
- 4 Please see Chapter 2, Alternatives, for a description of lot coverage requirements. As established in Seattle Municipal Code 23.44.010, the maximum lot coverage varies by lot size. For lots under 5,000 square feet, the maximum lot coverage allowed for principal and accessory structures is 1,000 square feet plus 15 percent of lot area. The maximum lot coverage for a lot of any size is not proposed to be changed; adding a DADU to a 3,200-square-foot lot would require that the main house and any other structures on the lot have not already exceeded the maximum lot coverage allowed.
- 5 Please see the frequent comment response concerning impacts to parking.
- 6 Attached ADUs are allowed on any single-family lot, regardless of lot size. The percent of lots that have an ADU includes both attached and detached accessory units.
- 7 As outlined in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would result in the creation of more ADUs under all action alternatives compared to Alternative 1 (No Action). While construction cost certainly impedes construction of additional ADUs, the analysis in the EIS shows that existing regulations also act as a barrier.
- 8 Additional discussion of short term rentals has been added to Chapter 3, History and Planning Context, and Section 4.1, Housing and Socioeconomics, of this Final EIS.
- 9 Thank you for your comment. The comment is noted.
- 10 Thank you for your comment. The comment is noted.

Cherry Hill Community Council (DiLeva, Mary Pat)

- 1 Thank you for your comment. The comment is noted.

Christensen, Thor

- 1 Please see Chapter 3, History and Planning Context, for a discussion of additional programmatic strategies the City could pursue in addition to, and independent of, the Land Use Code changes evaluated in this EIS.

Clabots, Barbara

- 1 Thank you for your comment. The comment is noted.

Clark, Karen

- 1 Please see the frequent comment response regarding individual neighborhood review.
- 2 The reestablishment of community councils is not being considered as part of the proposed Land Use Code changes and is outside the scope of the EIS.
- 3 The proposal evaluated in EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Determining what specific parcels will include an affordable housing project is outside the scope of this EIS.
- 4 Additional discussion of short term rentals has been added to Chapter 3, History and Planning Context, and Section 4.1, Housing and Socioeconomics, of this Final EIS.
- 5 MHA requirements are considered in the 2017 [MHA EIS](#) and are outside the scope of this EIS.
- 6 Thank you for your comment. The comment is noted.

Cook, Jeffrey

- 1 Thank you for your comment. The comment is noted.

Cooper, Valerie

- 1 Thank you for your comment. The comment is noted.

Coulter, Sara

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

Culver, Aleksandra

- 1 Thank you for your comment. The comment is noted.

- 2 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative, including removing the off-street parking requirement.
- 3 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 4 Please see Chapter 2, Alternatives. The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 5 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative that includes allowing two ADUs (either two attached or one attached and one detached).
- 6 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes increases in height and rear yard coverage for a single-story ADU provided construction does not result in tree removal.
- 7 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 8 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 9 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes exempting floor area in an ADU from the maximum FAR calculations to incentivize ADUs and allows for some additional height for DADUs that incorporate green building features.
- 10 Please see Chapter 2, Alternatives. The Preferred Alternative does not include an affordability requirement.

DeForest, Stephen

- 1 Please see the frequent comment response regarding individual neighborhood review.

Denison, Sharon

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

Eyler, Alicia

- 1 Thank you for your comment. The comment is noted.

Eytinge, Jonathan

- 1 The objective of the EIS is remove regulatory barriers to ADUs to make it easier to build an ADU and to increase the number and variety of housing choices in single-family zones.
- 2 Please see the frequent comment response regarding individual neighborhood review.

- 3 Thank you for your comment. The comment is noted.
- 4 Thank you for your comment. The comment is noted.
- 5 Thank you for your comment. The comment is noted.
- 6 Please see the frequent comment response regarding individual neighborhood review and parking impacts.

Fauntleroy CC

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment responses regarding individual neighborhood review and housing affordability.
- 3 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 4 Staff from Seattle Public Utilities have been involved in the review of the EIS. Please see the frequent comment response concerning impacts to the water, drainage and sewer systems.
- 5 The EIS analyzes how each alternative could affect the maximum residual land value of each combination of parcel type and neighborhood. (Residual land value is the developer's land budget for a particular project. Increases to residual land value indicate the potential for increases in property values.) Please see Section 4.1, Housing and Socioeconomics, for discussion of potential changes to property values do the proposed alternatives. We have added additional analysis and discussion of potential property tax implications as part of this Final EIS.
- 6 As shown in Section 4.1, Housing and Socioeconomics, in higher- and medium-price neighborhoods, the amount a developer could afford to pay for land increases for parcel types C and D, suggesting that property values could increase for those properties. Smaller parcel types (A and B) in higher- and medium-price neighborhoods show minimal changes across the four alternatives. In lower-price neighborhoods, the amount a developer could afford to pay shows only small changes across the four alternatives, suggesting minimal change in property values. As discussed in Section 4.1, risk of displacement is generally higher in lower-price neighborhoods, so those at greatest risk of displacement will generally be less effected by any changes in property values. However, changes to residual land value do not directly impact property tax bills, for several reasons.

First, we use residual land value to better understand the underlying economics of the ADU provisions contemplated in the EIS. Changes in property valuations (used for tax assessments) will only show up to the extent that the potential for ADU creation results in increased sales prices, which is determined by ADU production rates and individual homebuyer and investor decisionmaking. It is not possible to use the residual land value analysis to directly forecast changes in property tax assessments. Second, actual property tax payments are are function of how properties are valued by the assessor

and in conjunction with rules for levying property taxes in the State of Washington. The King County Assessor assesses residential properties each year based on a complex statistical estimate of real market value. This Assessor's estimate relies on recent sales of comparable properties in the neighborhood and does not automatically reflect any changes to estimated residual land value. (In addition, all properties are inspected once every six years). This process is imperfect; in Seattle in 2017, the median appraised value for residential properties was \$528,000, while the median sales price was \$650,000.

Third, a homeowner's property tax bill does not scale proportionately with changes to assessed real market value. This is due to the complexities of Washington State's budget-based property tax system. In Washington, each jurisdiction's annual property tax levy cannot increase by more than 1 percent over the previous year's levy, unless the public votes for a greater increase. Taxes on new construction are exempt from the 1 percent limit. To illustrate this effect, consider the amount of taxes levied by the City of Seattle as part of its general rate (excluding voter-approved measures). Between 2010 and 2016, assessed value within the city increased by 33 percent, or 4.8 percent per year. Over the same period, the City's tax levy increased by 9 percent, or 1.5 percent per year. Holding all else constant (assuming no new construction or voter-approved levies), any assessed value increases over 1 percent per year will result in lowered property tax rates.

Recent increases to Seattle property tax bills are driven primarily by 1) statewide changes in how education is funded and 2) voter-approved measures, not by increased property values. In Seattle, nearly 50 percent of the property tax bill is due to voter-approved measures.

Finally, Washington State provides property tax exemption or deferral programs for people who are seniors, disabled, low-income, or widows/widowers of veterans. These programs are intended to minimize displacement due to property tax increases. The proposal does not require a homeowner to charge below market rent for ADUs.

- 7 Please see the frequent comment response concerning impacts to parking.
- 8 Please see the frequent comment response concerning impacts to parking.
- 9 Thank you for your comment. The comment is noted.

Feather, Aunt

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.
- 4 We discuss impacts on housing supply and affordability in Section 4.1, Housing and Socioeconomics. This section includes estimates of ADU production and single-family teardowns likely to occur under each alternative (see Appendix A for a full methodology). In general, this EIS considers an increase in housing supply to have the effect of reducing upward pressure on rents that results from competition for scarce housing, thereby marginally reducing economic displacement pressure through more housing choices.

The EIS also considers the number of single-family teardowns in each alternative and understands that fewer demolitions suggests lower potential for physical displacement.

Fernandez, Bryan

- 1 Thank you for your comment. The comment is noted.

Fiedler, Charles

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.

Fies, Michael

- 1 Thank you for your comment. The comment is noted.

Fitz-Hugh, Lynn

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

Foltz, Mark

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives. The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 3 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 4 The Preferred Alternative includes allowing some additional height for DADUs and additional rear lot coverage for a single-story DADU provided construction does not result in tree removal.
- 5 The Preferred Alternative would increase the maximum household size to up to 12 unrelated people if a lot has two ADUs.
- 6 Thank you for your comment. The comment is noted.

Fox, Rebecca

- 1 Additional discussion of short term rentals has been added to Chapter 3, History and Planning Context, and Section 4.1, Housing and Socioeconomics, of this Final EIS.
- 2 Thank you for your comment. The comment is noted.

Freeman, Robin

- 1 Thank you for your comment. The comment is noted.

Frisch, Janet

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding individual neighborhood review.
- 3 Thank you for your comment. Despite the perceived contradiction, the statement that ADUs "would likely continue to be distributed throughout the city" and the statement that "ADU production rates would likely vary by neighborhood profile" are both accurate. As described in Section 4.1, Housing and Socioeconomics, our analysis indicates that ADU production will occur on all four parcel types and in all neighborhood profiles. This is consistent with existing trends for ADU production. As shown in Exhibit 4.1-1, Seattle's existing ADUs are distributed across all single-family neighborhoods in the city.
- 4 However, the production of ADUs is not uniformly distributed across the city. As seen in Exhibit A-20, our analysis indicates that both observable parcel-level characteristics and neighborhood fixed effects are predictors of ADU production. This can be seen in the estimates of future ADU production. For example, in Alternative 4 we estimate that 4.4 percent of parcels in higher-price neighborhoods will add ADUs over the 10-year period, compared with 3.5 percent of parcels in medium-price neighborhoods and 2.8 percent of parcels in lower-price neighborhoods. Although there are differences in ADU production between neighborhoods, the highest ADU production rate is still quite low in absolute terms, with less than 0.5 percent of parcels adding an ADU each year.
- 5 The review of other cities' policies is not required under SEPA. Portland, OR, and Vancouver, B.C., are used as an instructive comparison with Seattle in Chapter 3, History and Planning Context, because those cities have adopted similar regulations to what is considered in this EIS. The EIS incorporates empirical parking data from Portland, OR, in order to inform assumptions about parking utilization and vehicle ownership in our analysis.
- 6 As outlined in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would result in the creation of more ADUs under Alternative 2, Alternative 3 and the Preferred Alternative compared to Alternative 1 (No Action). While construction cost certainly impedes construction of additional ADUs, the analysis in the EIS shows that existing regulations also act as a barrier.
- 7 Thank you for your comment. The comment is noted.
- 8 Please see Section 4.3, Aesthetics for revised graphics showing more cars and additional discussion in Appendix C.

Fuller, G

- 1 Thank you for your comment. The comment is noted.

Futurewise

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes removing the off-street parking requirement for ADUs.
- 3 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 4 The Preferred Alternative allows for additional height for DADUs that incorporate green building features.
- 5 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 6 Please also see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 7 The Preferred Alternative would increase the maximum household size to up to 12 unrelated people if a lot has two ADUs.
- 8 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

Goodwin, Jennifer

- 1 Thank you for your comment. The comment is noted.

Gordon, Joan

- 1 Thank you for your comment. The comment is noted.

Gordon, Richard

- 1 Please see the frequent comment response on housing affordability.

Greigs, The

- 1 Thank you for your comment. The comment is noted.

Haggberg, Marie

- 1 Thank you for your comment. The comment is noted.
- 2 Please see additional discussion of parking and transit access in Section 4.4, Parking and Transportation.
- 3 Thank you for your comment. The comment is noted.
- 4 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section

3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.

- 5 Thank you for your comment. The comment is noted.

Harris, Marlow

- 1 Thank you for your comment. The comment is noted.
- 2 The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding apartments are not considered as part of the proposed Land Use Code changes and are outside the scope of the EIS.

Harrison, Rob — 1

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding suggestions for greater flexibility than contemplated in Alternative 2 or 3.
- 3 Thank you for your comment. The comment is noted.
- 4 Please see the frequent comment response regarding suggestions for greater flexibility than contemplated in Alternative 2 or 3.
- 5 Thank you for your comment. The comment is noted.
- 6 Please see the frequent comment response regarding suggestions for greater flexibility than contemplated in Alternative 2 or 3.
- 7 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes allowing additional height for DADUs that incorporate green building features.
- 8 Yard requirements in single-family zones help maintain a consistent building pattern, allow for maintenance of the side of buildings, and provide a visual break between building footprints in the lowest-density residential zone. Changes to measurement techniques for required yards is not included in this EIS.
- 9 Thank you for your comment. The comment is noted.
- 10 Thank you for your comment. The comment is noted.
- 11 Please see Chapter 2, Alternatives. Alternatives 2 and 3 and the Preferred Alternative would allow greater flexibility to locate the entrance to a DADU.
- 12 Please see the frequent comment response regarding suggestions for greater flexibility than contemplated in Alternative 2 or 3.
- 13 Thank you for your comment. The comment is noted.
- 14 Thank you for your comment. The comment is noted.
- 15 Please see Chapter 2, Alternatives. The Preferred Alternative exempts floor area within any ADU (attached or detached) from the FAR limits.

Harrison, Rob — 2

- 1 Yard requirements in single-family zones help maintain a consistent building pattern, allow for maintenance of the side of buildings, and provide a visual break between building footprints in the lowest-density residential zone. Changes to regulations regarding measurement of required yards is outside the scope of this EIS.

Hatlen, Kari

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 3 Thank you for your comment. The comment is noted.

Herrin, Joe

- 1 Please refer to Section 4.1, Housing and Socioeconomics, for a discussion of the owner-occupancy requirement. Units could potentially be sold as condo units, but the land could not be subdivided.

Hirami, Eileen and Gosciwski, Victor

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response concerning individual neighborhood review.
- 3 The city is not building rental units as part of the proposed Land Use Code changes. This suggestion is outside the scope of the analysis.

Hoffman, Sara

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative that includes allowing two ADUs (either two attached or one attached and one detached). Please also see the frequent comment response regarding requests for greater flexibility than contemplated in Alternative 2 or 3.
- 3 The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 4 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 5 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. This includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.

- 6 Please see the frequent comment response regarding requests for greater flexibility than contemplated in Alternative 2 or 3.
- 7 The Preferred Alternative includes allowing for additional rear yard coverage for a single-story DADU provided construction does not result in tree removal.
- 8 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes allowing additional height for DADUs that incorporate green building features.
- 9 The Preferred Alternative would increase the maximum household size to up to 12 unrelated people if a lot has two ADUs.
- 10 The Preferred Alternative does not include an affordability requirement.
- 11 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 12 Please see Section 4.1, Housing and Socioeconomics, for a discussion related to the FAR limit and the associated impacts on teardowns related to displacement.

Holverstott, Brett

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding suggestions for greater flexibility than contemplated in Alternative 2 or 3.

Hurley, D Brad

- 1 Thank you for your comment. The comment is noted.

Ingham, Susan

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

Jagiello, Tom

- 1 Thank you for your comment. The comment is noted.

Johnson, Kathy

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section

3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.

Johnston, Emily

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 3 Thank you for your comment. The comment is noted.

K., Rick

- 1 As described in Section 4.1, Housing and Socioeconomics, our analysis indicates that ADU production will occur on all four parcel types and in all neighborhood profiles. This is consistent with existing trends on ADU production. As shown in Exhibit 4.1-1, Seattle's existing ADUs are distributed across all single-family neighborhoods in the city. While the analysis does assume that trend will continue, if a concentration of ADUs arises on a particular block, some localized impacts could occur.

Kallin, Chris

- 1 Thank you for your comment. The comment is noted.

Karakowski, Jonathan

- 1 Please see the frequent comment response regarding individual neighborhood review.
- 2 Please see Section 4.1, Housing and Socioeconomics, and Appendix A for a discussion of how the individual changes included in each alternative are considered as individual inputs into the analysis of ADU production. Under SEPA rules, the lead agency shall discuss impacts and alternatives at a level of detail appropriate to the scope of the nonproject proposal and to the level of planning for the proposal. Alternatives should be emphasized. In this EIS, the impacts are generally considered based on the combination of changes contemplated under each alternative.
- 3 Please see the frequent comment response concerning parking impacts. Please also see Appendix B for a discussion of the study locations that describes that data was repurposed from separate parking studies for two of the study locations and new data was collected for two study areas and for
- 4 Please see the Parking Analysis Area section in Section 4.4, Parking and Transportation, which describes how some of analysis relies on data previously collected, while new data was collected for two of the study areas (northeast and northwest) and

generally followed TIP 117. Please also note that TIP 117 provides guidance but does not require that data is collected on a Tuesday, Wednesday, or Thursday.

- 5 Exhibit 4.4-10 is correct. Route 2 is considered a 15-minute route. It has 56 outbound trips and 57 inbound trips between 6:00 a.m. and 7:00 p.m. (minimum is 52), and no individual hour has fewer than four trips (minimum is three). Route 29 is not symbolized as a 15-minute route; rather its entire extent is almost entirely covered by other more frequent routes: Route 2 through Queen Anne, Routes 3/4 on 3rd Ave W, Routes 31/32 on Nickerson St, D Line and 40 on the Ballard Bridge, Route 40 on Leary Way, and Route 44 on Market St. These all provide either 10- or 15-minute service along the same corridors. The one exception is W McGraw St between 6th Ave and 3rd Ave, where a segment of Route 29 is symbolized as "any frequency."
- 6 Routes 2 and 29 are correctly symbolized in Exhibit 4.4-10.
- 7 Thank you for the suggestion regarding the symbols we used for bus stops. We have updated those in Exhibit 4.4-12. As noted in previous responses, no changes are necessary for Exhibit 4.4-10 because it correctly represents routes 2 and 29.
- 8 The Full Build-Out scenario was included only in the aesthetics analysis to illustrate a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it here to illustrate the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.
- 9 As noted in Section 4.4, Parking and Transportation, and Appendix B, the study locations are representative samples and are intended to be presented as such. However, Exhibits B-12 through B-15 have been updated to include street names.
- 10 As noted in Section 4.4, Parking and Transportation, and Appendix B, the study locations are representative samples and are intended to be presented as such.
- 11 Our assumption of two parking spaces available for each parcel type was chosen to ensure that the analysis of highest and best use in Section 4.1, Housing and Socioeconomics, was not constrained by lack of parking for ADUs. On the whole, this assumption may result in an overestimate of the feasibility of adding ADUs, which would translate into an overestimate of ADU production. (In reality, some parcels likely would be constrained from adding ADUs by lack of parking or the cost of adding an additional parking space. However, parking waivers are available in cases where adding a parking space is physically infeasible due to steep topography or the location of existing structures.) The parking analysis in Section 4.3, Aesthetics, used the parcel types to classify parcels in the study areas but did not assume that new ADUs would use off-street parking. On the contrary, the parking analysis assumed that all ADU vehicles would park on-street. This assumption likely results in an overestimate of parking effects, as some ADU residents would likely park off-street (where off-street parking is available).

Katz, Andy

- 1 The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. This includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 3 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 4 The Preferred Alternative includes allowing two ADUs (either two attached or one attached and one detached). Please also see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 5 The Preferred Alternative includes allowing additional height for DADUs that incorporate green building features.
- 6 The Preferred Alternative includes allowing for additional rear yard coverage for a single-story DADU provided construction does not result in tree removal.
- 7 The Preferred Alternative would increase the maximum size of a DADU to 1,000 square feet.
- 8 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 9 Please see Section 4.1, Housing and Socioeconomics, for a discussion of the FAR limit and the associated impacts on teardowns related to displacement.
- 10 The Preferred Alternative does not include an affordability requirement.

Keeley, Karen

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 4 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 5 Thank you for your comment. The comment is noted.
- 6 Please see Chapter 2, Alternatives. Changes to subdivision regulations are not considered as part of the proposed Land Use Code.
- 7 The stated objective of the proposal is to increase the production levels of ADUs. As described in the analysis in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would increased those production levels.
- 8 Thank you for your comment. The comment is noted.

Kettle, Robert

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

Kimelman, David

- 1 Thank you for your comment. The comment is noted.

Kirschner, Bryan and Ferguson, Holly

- 1 Thank you for your comment. The comment is noted.
- 2 The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 3 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. This includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet. Please also see the frequent comment response regarding requests for greater flexibility than contemplated in Alternative 2 or 3.
- 4 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 5 The Preferred Alternative includes allowing two ADUs (either two attached or one attached and one detached). Please also see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 6 The Preferred Alternative includes allowing additional height for DADUs that incorporate green building features.
- 7 The Preferred Alternative includes allowing for additional rear yard coverage for a single-story DADU provided construction does not result in tree removal.
- 8 The Preferred Alternative would increase the maximum size of a DADU to 1,000 square feet. Please also see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 9 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 10 Please see Section 4.1, Housing and Socioeconomics, for a discussion of the FAR limit and associated impacts on teardowns related to displacement.
- 11 The Preferred Alternative does not include an affordability requirement.
- 12 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 13 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.

- 14 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 15 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 16 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.

Krom, Georgi

- 1 Thank you for your comment. The comment is noted.

Lai, Kevin and Jennifer

- 1 Thank you for your comment. The comment is noted.
- 2 Additional discussion of the owner-occupancy requirement has been added to Section 4.2, Land Use, and Appendix A of this Final EIS.
- 3 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The owner occupancy requirement would not be removed in the Preferred Alternative. Under existing regulations or what is proposed in Alternative 3, if the owner sold the property the new owner would have to live on site if they want to rent out either the main house or an ADU.
- 4 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The owner occupancy requirement would not be maintained in the Preferred Alternative. Under existing regulations or what is proposed in Alternative 3, if the owner sold the property the new owner would have to live on site if they want to rent out either the main house or an ADU.
- 5 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The owner occupancy requirement would be removed in the Preferred Alternative

Lange, Larry

- 1 The parking analysis presented in Section 4.4, Parking and Transportation, uses the conservative assumption that any cars associated with newly ADU constructed would parking on the street, regardless of the proposed Land Use Code change.
- 2 Please see Appendix B for a description of data sources. As noted, peak parking demand usually occurs overnight on a weeknight, therefore we collected data on both weeknights and weekend overnight parking supply and utilization to estimate residential parking usage.
- 3 Please see the frequent comment response concerning impacts to parking.
- 4 The same design requirements for neighborhood character in the 2035 Comprehensive Plan would apply to the construction of new ADUs.

- 5 Please see Section 4.4, Parking and Transportation, for a discussion of impacts on parking and transportation and Section 4.3, Aesthetics, for a discussion of impacts on height, bulk, and scale.

LaPierre, Curtis

- 1 Areas in urban villages are outside the scope of the Land Use Code changes considered in this EIS. However, RSL zoning would not preclude creation of an ADU.
- 2 Thank you for your comment. The comment is noted.

Latoszek, Mira

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding individual neighborhood review.
- 3 Thank you for your comment. The comment is noted.
- 4 Please see the frequent comment response regarding individual neighborhood review.

Lau, Andy

- 1 Thank you for your comment. The comment is noted.

Laurelhurst CC

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.
- 4 The analysis of the potential impacts to public services and utilities in the EIS for the Seattle 2035 Comprehensive Plan (Seattle 2015 and Seattle 2016) is incorporated by reference into this EIS. The Comprehensive Plan EIS and this EIS both consider the same question: How does projected growth in the city affect the ability of public services and utilities to provide adequate service? The Comprehensive Plan EIS thoroughly analyzed the potential impacts to public services and utilities from a projected growth of 70,000 households in the city through 2035, including approximately 8,400 households in areas outside designated urban villages. Since the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS, we considered the estimated increase in households from the proposed Land Use Code changes and evaluated the impacts in the context of the changes analyzed in the Comprehensive Plan EIS. As noted in Section 4.5, Public Services and Utilities, Seattle Public Schools plans for student populations changes in the facility planning and is actively planning for future growth.
- 5 Please see the frequent comment response concerning parking impacts.
- 6 Additional discussion of short term rentals has been added to Chapter 3, History and Planning Context, and Section 4.1, Housing and Socioeconomics, of this Final EIS.

- 7 As described in Section 4.3, Aesthetics, under any alternative, development of new buildings could contribute new sources of light and glare from additional night lighting, higher visibility of interior lighting through windows at night, and reflection from windows. Although these light sources would increase, none of these sources is expected to cause adverse aesthetic impacts because many of these types of lights already exist in the study area.
- 8 Thank you for your comment. The comment is noted.
- 9 Any separate storage space that is entirely outside of the accessory dwelling unit would not be counted towards the size of ADU. For example, if you have an existing garage where you have storage space on the main level and build a ADU as a second story above the garage and storage, that storage area would not be included in the size calculation for the ADU. Under existing regulations the storage and parking areas count towards the maximum ADU size. This change modifies how the size of the ADU is calculated.
- 10 Thank you for your comment. The comment is noted.
- 11 Thank you for your comment. The comment is noted.
- 12 Section 4.2, Land Use, of the EIS notes that impacts in areas with an increase in population density could include changes in privacy, which are likely to be minor.
- 13 Thank you for your comment. The comment is noted.
- 14 The EIS discusses impacts on housing supply and affordability in Section 4.1, Housing and Socioeconomics. This section includes estimates of ADU production and single-family teardowns like to occur under each alternative (see Appendix B for a full methodology). In general, the EIS considers an increase in housing supply to have the effect of reducing upward pressure on rents that results from competition for scarce housing, thereby marginally reducing economic displacement pressure through more housing choices. The EIS also considers the number of single-family teardowns in each alternative and understands that fewer demolitions suggests lower potential for physical displacement.
- 15 As noted, short-term rentals were considered in the housing and socioeconomic analysis. Additional discussion is added in Chapter 3, History and Planning Context, and Section 4.1, Housing and Socioeconomics, of this Final EIS.
- 16 Thank you for your comment. The comment is noted.

Lazerwitz, Jay

- 1 The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. This includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 3 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.

- 4 The Preferred Alternative includes allowing two ADUs (either two attached or one attached and one detached). Please also see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 5 The Preferred Alternative includes allowing additional height for DADUs generally, additional height for DADUs that incorporate green building features and would increase the maximum size of a DADU to 1,000 square feet.
- 6 The Preferred Alternative includes allowing for additional rear yard coverage for a single-story DADU provided construction does not result in tree removal.
- 7 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 8 Please see Section 4.1, Housing and Socioeconomics, and a discussion related to the FAR limit and the associated impacts on teardowns related to displacement.
- 9 The Preferred Alternative does not include an affordability requirement.

Leman, Chris

- 1 Thank you for your comment. The comment is noted.

LeVine, Sharon

- 1 Please see the frequent comment response regarding individual neighborhood review.

Loesche, Patricia

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

Lowe, Marco

- 1 Thank you for your comment. The comment is noted.

Mackay, Mary Jane

- 1 Thank you for your comment. The comment is noted.

Magnolia Community Council

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 2 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

- 3 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 4 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 5 Please see the frequent comment response concerning impacts on tree canopy. Please also see Section 4.2, Land Use for an updated discussion of tree canopy and new section on parks and open space.
- 6 Thank you for your comment. The comment is noted.
- 7 Thank you for your comment. The comment is noted.

McCain, Cheryll

- 1 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative and the owner-occupancy requirement. See Section 4.1, Housing and Socioeconomics, for analysis of removal of the owner-occupancy requirement.
- 2 Thank you for your comment. The comment is noted.
- 3 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 4 The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to parking regulations applicable to all uses citywide are not considered as part of the proposed Land Use Code changes and are outside the scope of the EIS.
- 5 Thank you for your comment. The comment is noted.

McGuire, Hank

- 1 Construction of new ADUs would continue to be subject to all requirements of the Seattle Fire Code, including fire department access requirements to units.
- 2 Seattle Municipal Code 23.84a.032.R.20.f provides the definition for rowhouse development. The definition of accessory dwelling unit is found in Seattle Municipal Code 23.84a.032.R.1.

McQuiston, Cheryl

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

Miles, Don

- 1 As discussed in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would have a marginal benefit for housing affordability due to increasing the supply of housing in the city.

"The EIS discusses impacts on housing supply and affordability in Section 4.1. This section includes estimates of ADU production and single-family teardowns like to occur under each alternative (see Appendix B for a full methodology). In general, the EIS considers an increase in housing supply to have the effect of reducing upward pressure on rents that results from competition for scarce housing, thereby marginally reducing economic displacement pressure through more housing choices. The EIS also considers the number of single-family teardowns in each alternative and understands that fewer demolitions suggests lower potential for physical displacement.

- 2 In the EIS, the phrase "upward pressure" in general refers to the phenomenon wherein population growth leads to increased competition for a finite number of homes on the market, resulting in higher prices as sellers respond to increasing demand and purchasing power among higher-income households. Given the many complex and interdependent factors that contribute to and determine housing costs, it would be speculative to project a specific increase in housing costs for each alternative.

The estimated number of teardowns for each alternative is quantified in Exhibit 4.1-12. The phrase "marginally more teardowns" in general means slightly more teardowns. As shown in Exhibit 4.1-12, the estimated number of teardowns in Alternative 2, Alternative 3, and the Preferred Alternative is lower than Alternative 1 (No Action) due to policy changes contemplated in each alternative, including removal of parking and owner-occupancy requirements and/or addition of an FAR limit for development in single-family zones. These changes tend to reduce the relative feasibility of demolishing a house and building one large new house compared to development that includes ADUs.

The phrase "displacement pressure" refers to the likelihood of involuntary dislocation that households face. The EIS estimates potential direct displacement due to demolition of existing housing (see Exhibit 4.1-12). While not all demolished single-family homes result in the displacement of a low-income household, the production model used in Section 4.1, Housing and Socioeconomics, results in an estimate of lots in the study area where the existing single-family house would be torn down and rebuilt. Economic displacement is more difficult to estimate. The EIS considers that greater ADU production likely increases rental housing options in the study area, thereby moderating housing price increases and reducing economic displacement pressure. The EIS also considers that greater ADU production allows more households to benefit from rental revenue, though we recognize that, absent other actions, overall construction costs will tend to limit ADU development to homeowners with relatively higher income under all alternatives."

- 3 Please see Section 4.2, Land Use. This chapter has been updated to include a discussion of historic resources.
- 4 The Full Build-Out scenario was included only in the aesthetics analysis to illustrate a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it here to illustrate the maximum scale of development

allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.

- 5 The highest and best use analysis and ADU production estimates generally suggest that, similar to past trends, future ADU development will tend to be distributed across parcel types and market areas. See Section 4.1 for discussion of market areas that may see marginally different rates of ADU production.
Each section of the EIS then considers potential impacts of population increases using a methodology appropriate for the area of the environment in question. While production estimates suggest ADU production is likely to remain distributed, the EIS acknowledges that localized impacts could occur if ADU production is particularly concentrated in an area, such as a single block. The EIS also considers anticipated population increases due to ADU production in the context of 20-year growth estimates evaluated in the Final EIS for the Seattle 2035 Comprehensive Plan
- 6 Please see Section 4.3, Aesthetics, for added graphics and text related to development on a sloping site.
- 7 The Full Build-Out scenario was included only in the aesthetics analysis to illustrate a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it here to illustrate the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.
- 8 Please see the frequent comment response concerning impacts to parking.
- 9 The highest and best use analysis and ADU production estimates generally suggest that, similar to past trends, future ADU development will tend to be distributed across parcel types and market areas. See Section 4.1, Housing and Socioeconomics for discussion of market areas that may see marginally different rates of ADU production.
Each section of the EIS then considers potential impacts of population increases using a methodology appropriate for the area of the environment in question. While production estimates suggest ADU production is likely to remain distributed, the EIS acknowledges that localized impacts could occur if ADU production is particularly concentrated in an area, such as a single block. The EIS also considers anticipated population increases due to ADU production in the context of 20-year growth estimates evaluated in the Final EIS for the Seattle 2035 Comprehensive Plan
- 10 Please see Section 4.3, Aesthetics, for added graphics and text related to development on a sloping site.

Nicol-Blades, Berta

- 1 Thank you for your comment. The comment is noted.

Nicolosi, Michelle

- 1 Thank you for your comment. The comment is noted.

Okamoto, Margaret

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 The analysis of the potential impacts to public services and utilities in the EIS for the Seattle 2035 Comprehensive Plan (Seattle 2015 and Seattle 2016) is incorporated by reference into this EIS. The Comprehensive Plan EIS and this EIS both consider the same question: How does projected growth in the city affect the ability of public services and utilities to provide adequate service? The Comprehensive Plan EIS thoroughly analyzed the potential impacts to public services and utilities from a projected growth of 70,000 households in the city through 2035, including approximately 8,400 households in areas outside designated urban villages. Since the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS, we considered the estimated increase in households from the proposed Land Use Code changes and evaluated the impacts in the context of the changes analyzed in the Comprehensive Plan EIS.
- 4 Staff from Seattle Public Utilities have been involved in the review of the EIS. Please see the frequent comment response concerning impacts to the water, drainage and sewer systems.
- 5 Thank you for your comment. The comment is noted.
- 6 The analysis of the potential impacts to public services and utilities in the EIS for the Seattle 2035 Comprehensive Plan (Seattle 2015 and Seattle 2016) is incorporated by reference into this EIS. The Comprehensive Plan EIS and this EIS both consider the same question: How does projected growth in the city affect the ability of public services and utilities to provide adequate service? The Comprehensive Plan EIS thoroughly analyzed the potential impacts to public services and utilities from a projected growth of 70,000 households in the city through 2035, including approximately 8,400 households in areas outside designated urban villages. Since the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS, we considered the estimated increase in households from the proposed Land Use Code changes and evaluated the impacts in the context of the changes analyzed in the Comprehensive Plan EIS.

As noted in Section 4.5 of the EIS, Seattle Public Schools plans for student populations changes in the facility planning and is actively planning for future growth.
- 7 The EIS discusses impacts on housing supply and affordability in Section 4.1, Housing and Socioeconomics. This section includes estimates of ADU production and single-family teardowns like to occur under each alternative (see Appendix A for a full methodology). In general, the EIS considers an increase in housing supply to have the effect of reducing

upward pressure on rents that results from competition for scarce housing, thereby marginally reducing economic displacement pressure through more housing choices. The EIS also considers the number of single-family teardowns in each alternative and understands that fewer demolitions suggests lower potential for physical displacement.

Oliver, H. Pike

- 1 Thank you for your comment. The comment is noted.
- 2 The Preferred Alternative includes allowing two ADUs (either two attached or one attached and one detached). Please also see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 3 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. This includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 4 The Preferred Alternative includes allowing additional height for DADUs depending on lot width. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 5 The Preferred Alternative includes allowing additional height for DADUs that incorporate green building features.
- 6 The Preferred Alternative would increase the maximum size of a DADU to 1,000 square feet. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 7 The Preferred Alternative would increase the maximum household size to up to 12 unrelated people if a lot has two ADUs. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 8 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. DADUs can be located in front of the main house if it is outside of the required front yard. Please see Exhibit 2-6 that illustrates required yards in single-family zones.
- 9 The Preferred Alternative does include greater flexibility for placement of the DADU entrance. Please also see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 10 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 11 Please see response to comment #2 above.
- 12 Please see response to comment #3 above.
- 13 Please see response to comment #4 above.
- 14 Please see response to comment #3 above.
- 15 Please see response to comment #7 above.
- 16 Please see response to comment #8 above.

- 17 Please see response to comment #9 above.
- 18 Thank you for your comment. Please see Section 4.1, Housing and Socioeconomics, for discussion of the FAR limit and how that input affects the estimated number of teardowns.
- 19 Please see the frequent comment response regarding request for greater flexibility than contemplated in Alternative 2 or 3.
- 20 Thank you for your comment. The comment is noted.

Osborne, George

- 1 The EIS analyzes how each alternative could affect the maximum residual land value of each combination of parcel type and neighborhood. (Residual land value is the developer's land budget for a particular project. Increases to residual land value indicate the potential for increases in property values.) Please see Section 4.1, Housing and Socioeconomics, for discussion of potential changes to property values do the proposed alternatives. We have added additional analysis and discussion of potential property tax implications as part of this Final EIS.

As described in Section 4.1, Housing and Socioeconomics, in higher- and medium-price neighborhoods, the amount a developer could afford to pay for land increases for parcel types C and D, suggesting that property values could increase for those properties. Smaller parcel types (A and B) in higher- and medium-price neighborhoods show minimal changes across the four alternatives. In lower-price neighborhoods, the amount a developer could afford to pay shows only small changes across the four alternatives, suggesting minimal change in property values. As discussed in Section 4.1, risk of displacement is generally higher in lower-price neighborhoods, so those at greatest risk of displacement will generally be less effected by any changes in property values.

However, changes to residual land value do not directly impact property tax bills, for several reasons.

First, we use residual land value to better understand the underlying economics of the ADU provisions contemplated in the EIS. Changes in property valuations (used for tax assessments) will only show up to the extent that the potential for ADU creation results in increased sales prices, which is determined by ADU production rates and individual homebuyer and investor decision-making. It is not possible to use the residual land value analysis to directly forecast changes in property tax assessments. Second, actual property tax payments are a function of how properties are valued by the assessor and in conjunction with rules for levying property taxes in the State of Washington. The King County Assessor assesses residential properties each year based on a complex statistical estimate of real market value. This Assessor's estimate relies on recent sales of comparable properties in the neighborhood and does not automatically reflect any changes to estimated residual land value. (In addition, all properties are inspected once every six years). This process is imperfect; in Seattle in 2017, the median appraised value for residential properties was \$528,000, while the median sales price was \$650,000.

Third, a homeowner's property tax bill does not scale proportionately with changes to assessed real market value. This is due to the complexities of Washington State's budget-based property tax system. In Washington, each jurisdiction's annual property tax levy cannot increase by more than one percent over the previous year's levy, unless the public votes for a greater increase. Taxes on new construction are exempt from the 1 percent limit. To illustrate this effect, consider the amount of taxes levied by the City of Seattle as part of its general rate (excluding voter-approved measures). Between 2010 and 2016, assessed value within the city increased by 33 percent, or 4.8 percent per year. Over the same period, the City's tax levy increased by 9 percent, or 1.5 percent per year. Holding all else constant (assuming no new construction or voter-approved levies), any assessed value increases over 1 percent per year will result in lowered property tax rates.

Recent increases to Seattle property tax bills are driven primarily by 1) statewide changes in how education is funded and 2) voter-approved measures, not by increased property values. In Seattle, nearly 50 percent of the property tax bill is due to voter-approved measures.

Finally, Washington State provides property tax exemption or deferral programs for people who are seniors, disabled, low-income, or widows/widowers of veterans. These programs are intended to minimize displacement due to property tax increases.

- 2 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

Pearson, Linda

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

Pedroso, Anna

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

Pehl, Tom

- 1 Thank you for your comment. The comment is noted.

Perkins, Sandra

- 1 Thank you for your comment. The comment is noted.

Peterson, S Brook

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

- 3 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 4 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 5 Please see Section 3.2, Planning Context, for added discussion about short-term rentals and Section 4.1, Housing and Socioeconomics, for a discussion of how short-term rental income was included in the pro-forma analysis.
- 6 The Preferred Alternative includes allowing two ADUs (either two attached or one attached and one detached). Allowing for multifamily structures is outside the scope of this EIS; please see the frequent comment response concerning multifamily zoning.
- 7 Please see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 8 The Preferred Alternative includes allowing additional height for DADUs that incorporate green building features. Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.

Phinney Ridge CC

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding individual neighborhood review.
- 3 Please see the frequent comment response concerning impacts to parking.
- 4 The EIS analyzes how each alternative could affect the maximum residual land value of each combination of parcel type and neighborhood. (Residual land value is the developer's land budget for a particular project. Increases to residual land value indicate the potential for increases in property values.) Please see Section 4.1, Housing and Socioeconomics, and Exhibit A-44 for discussion of potential changes to property values do the proposed alternatives. We have added additional analysis and discussion of potential property tax implications as part of this Final EIS.

As shown in Exhibit A-44, in higher- and medium-price neighborhoods, the amount a developer could afford to pay for land increases for parcel types C and D, suggesting that property values could increase for those properties. Smaller parcel types (A and B) in higher- and medium-price neighborhoods show minimal changes across the four alternatives. In lower-price neighborhoods, the amount a developer could afford to pay shows only small changes across the four alternatives, suggesting minimal change in property values. As discussed in Section 4.1, risk of displacement is generally higher in lower-price neighborhoods, so those at greatest risk of displacement will generally be less effected by any changes in property values.

However, changes to residual land value do not directly impact property tax bills, for several reasons.

First, we use residual land value to better understand the underlying economics of the ADU provisions contemplated in the EIS. Changes in property valuations (used for tax assessments) will only show up to the extent that the potential for ADU creation results in increased sales prices, which is determined by ADU production rates and individual homebuyer and investor decision-making. It is not possible to use the residual land value analysis to directly forecast changes in property tax assessments. Second, actual property tax payments are a function of how properties are valued by the assessor and in conjunction with rules for levying property taxes in State of Washington. The King County Assessor assesses residential properties each year based on a complex statistical estimate of real market value. This Assessor's estimate relies on recent sales of comparable properties in the neighborhood and does not automatically reflect any changes to estimated residual land value. (In addition, all properties are inspected once every six years). This process is imperfect; in Seattle in 2017, the median appraised value for residential properties was \$528,000, while the median sales price was \$650,000.

Third, a homeowner's property tax bill does not scale proportionately with changes to assessed real market value. This is due to the complexities of Washington State's budget-based property tax system. In Washington, each jurisdiction's annual property tax levy cannot increase by more than one percent over the previous year's levy, unless the public votes for a greater increase. Taxes on new construction are exempt from the 1 percent limit. To illustrate this effect, consider the amount of taxes levied by the City of Seattle as part of its general rate (excluding voter-approved measures). Between 2010 and 2016, assessed value within the city increased by 33 percent, or 4.8 percent per year. Over the same period, the City's tax levy increased by 9 percent, or 1.5 percent per year. Holding all else constant (assuming no new construction or voter-approved levies), any assessed value increases over 1 percent per year will result in lowered property tax rates.

Recent increases to Seattle property tax bills are driven primarily by 1) statewide changes in how education is funded and 2) voter-approved measures, not by increased property values. In Seattle, nearly 50 percent of the property tax bill is due to voter-approved measures.

Finally, Washington State provides property tax exemption or deferral programs for people who are seniors, disabled, low-income, or widows/widowers of veterans. These programs are intended to minimize displacement due to property tax increases.

- 5 Thank you for your comment. The comment is noted.
- 6 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 7 Thank you for your comment. The comment is noted.
- 8 Please see the frequent comment response regarding individual neighborhood review.

Pittenger, Glenn

- 1 Thank you for your comment. The comment is noted.

- 2 Please Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative would eliminate the off-street parking requirement for ADUs.
- 3 Per Seattle Municipal Code Section 23.40.020, variances may be sought from the provisions of Subtitle III, Divisions 2, 3, and 4 of this Title 23. This provision would allow an applicant to seek a variance.
- 4 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 5 Thank you for your comment. The comment is noted.
- 6 Capacity charges are levied by King County; the City does not have authority to waive those fees. King County has two studies underway that may lead to changes to the capacity charge, including charges for a new ADU (see <https://www.kingcounty.gov/services/environment/wastewater/capacity-charge/review-studies.aspx> for more information). Please also see the frequent comment response regarding King County Sewage Treatment Capacity Charges.

Pleusnin, George

- 1 Thank you for your comment. The comment is noted.

Queen Anne Historical Society

- 1 Please see the frequent comment response regarding individual neighborhood review.

Queen Anne Community Council

- 1 The City does not disagree that existing Land Use Code regulations enable the construction of ADUs in single-family zones; however, the stated objective of the proposal is to increase those production levels. And, as described in Section 4.1, Housing and Socioeconomics, of the EIS, the results of the analysis indicate that changing the Land Use Code would result in an increase in the productions of ADUs. The impacts from the construction of additional ADUs are discussed in Chapter 4, Environmental Analysis .
- 2 The proposed action would amend, not overturn, the Land Use Code regulations related to ADUs. The Seattle Planning Commission has submitted comments in support of the proposed code changes.

While review of other cities' policies is not required under SEPA, the EIS incorporates empirical parking data from Portland, Oregon, to inform assumptions about parking utilization and vehicle ownership in our analysis. Please see Appendix B for a discussion of this methodology. In particular, see the equations beginning on page B-21 for examples of mathematical equations we used to adjust Portland data based on Seattle-specific metrics. Along with normalizing Portland data in this way, we conservatively rounded several assumptions upward so that the analysis considers impacts from relatively higher numbers of vehicles. For example, as described on page B-24, our ADU production estimates show that between 1.63 and 4.64 percent

of parcels would have an ADU depending on parcel characteristics, we estimated demand for on-street parking by conservatively applying the highest estimated ADU production rate at the nearest whole number for all eligible parcels.

Portland is an instructive comparison with Seattle. The December 2016 Hearing Examiner's Decision notes only that Portland allows one ADU of up to 800 square feet and the proposal evaluated in this EIS would allow two larger units. The EIS accounts for that distinction by modeling unit size and two-ADU outcomes in the highest and best use analysis and then incorporating those findings into the ADU production model.

- 3 The ADU EIS is a programmatic environmental impact statement. It uses an appropriate level of analysis to evaluate the effects of a broad proposal that may include numerous individual projects, implemented over a long timeframe, and/or across a large geographic area. SEPA does not require that the City prepare separate analyses or documents for each ADU constructed.

For programmatic proposals, including areawide zoning and land use changes like the proposed action, SEPA Rules require only that an EIS contain a general discussion of the impacts of alternative proposals for plans, land use designations, or implementation measures. SEPA does not require site-specific analyses for individual geographic areas (WAC 197-11-442[3] and [4]). Therefore, analyzing certain impacts of the proposed Land Use Code changes at a broader scale is appropriate.

To understand the effects of this broad proposal, the EIS contains substantial information and analysis about, and based on review of, generalized variations among individual neighborhoods, subareas, and parcels. The highest and best use analysis in Section 4.1, Housing and Socioeconomics, relies on pro formas that consider varying market conditions by neighborhood area (see Exhibit 4.1-10). We developed and used a parcel typology that accounts for variation in parcel characteristics across the study area (see Exhibit 4.1-11). We present the frequency of these parcel types in each single-family neighborhood, so findings that vary by parcel type can be understood in the context of actual neighborhood conditions (see Exhibit A-23).

The parking analysis also considers differing neighborhood-level conditions. We used empirical data on parking utilization and availability gathered through parking studies in four representative neighborhoods (see Exhibit B-1). The transportation section identifies unimproved sidewalks across the entire study area (see Exhibit 4.4-6). We present the existing transit network and illustrate areas of Seattle according to their proximity to frequent transit (see Exhibit 4.4-10, Exhibit 4.4-11, and Exhibit 4.4-12).

Chapter 3, Housing and Planning Context, discusses and presents several exhibits that illustrate the variation in cultural, economic, and social conditions across Seattle. In particular, Exhibit 3-12 shows population by race, and Exhibit 3-15 shows housing tenure across the city. Exhibit 4.1-16, Exhibit 4.1-18, and Exhibit 4.1-19 present further information about demographic and socioeconomic variation across neighborhoods in the study area.

Under SEPA Rules, the purpose of an EIS is to identify likely significant adverse environmental impacts. Used in this context, "significant" means a reasonable

likelihood of more than a moderate adverse impact on environmental quality. The EIS identifies many effects and outcomes that could result from the Land use Code changes contemplated under each alternative, such as potential increases in parking utilization, or localized impacts if a concentration of ADU development occurs in a parking block. However, the analysis in this EIS does not find that the proposal would result in significant adverse impacts on any element of the environment to be analyzed under SEPA.

4 See the response to comment #3 above.

This statement, which appears on page 4-86 of the Final EIS, is provided specifically in the context of describing the existing conditions for the aesthetics analysis, which evaluates impacts to height, bulk, and scale. The paragraph goes on to state that the analysis considers common built form conditions since the proposed Land Use Code changes would affect infill development in already developed neighborhoods. Accordingly, a comprehensive summary of every aesthetic feature in the study area is not required under SEPA.

5 The EIS relies on detailed analysis and study of the potential effects of the Land Use Code changes and ties the results of the study to support the conclusions in the EIS. The EIS quantitatively evaluates the number of new ADUs that would result from the proposed Land Use Code changes and evaluates how the anticipated changes to the rate of ADU production would impact elements of the environment, providing a basis of comparison among the alternatives considered in the EIS.

6 This statement, which appears on page 4-86 of this Final EIS, is provided specifically in the context of describing the existing conditions for the aesthetics analysis. The paragraph goes on to state that the analysis considers common built form conditions since the proposed Land Code Use changes would affect infill development in already-developed neighborhoods.

As outlined in Section 4.4.1 of the Draft EIS, the parking analysis area provides a representative sample of neighborhoods where ADUs could be constructed. Four study locations were selected that represent a range of conditions found in single-family zones and include areas that vary by lot size; the presence of alleys, driveways, and sidewalks; and proximity to transit. We identified blocks with unrestricted parking, restricted parking, and no parking allowed. Many areas outside these study locations resemble the conditions found within the study locations. To the extent that there are areas distinctly different than the study locations, the EIS discloses that, in specific contexts or locations, localized impacts on parking availability could occur. Please see Exhibit B-3 through Exhibit B-14, which provide maps of each parking study location, illustrate the distribution of lot sizes in each study location, and compare this distribution to the EIS study area overall. In general, the parking study locations represent a range of conditions in terms of lot sizes, resembling conditions found in the entire EIS study area. To the extent that there are areas distinctly different than the study locations, the EIS discloses that, within a specific context or location, localized impacts on parking availability could occur.

- 7** Please see the previous response to comment #3 and the frequent comment response related to neighborhood-level analysis.
- 8** Please see the previous responses to comments #2, #3, and #6.

The parking analysis evaluated parking utilization overnight on weeknights and during the afternoon on weekends in the four study locations. These are typically when peak parking demand occurs. Effects of commuters entering Seattle and parking on City streets close to transit service were not specifically considered as this effect would not be realized during weekend or weeknight parking, nor would the practice of "park and hide" increase due to the changes contemplated in this EIS.
- 9** As described in Section 3 of Appendix B, no data exists for vehicle ownership rates for ADU residents in Seattle. Therefore, the average rate of vehicle ownership for ADU residents in Seattle was calculated using data from a survey of vehicle ownership for ADU owners in Portland, Oregon, and U.S. Census data for vehicle ownership for renters in Seattle. The analysis conservatively assumes that all ADU residents would utilize on-street parking, regardless of whether off-street parking is available or whether the alternative includes an off-street parking requirement.

We did not directly borrow the vehicle ownership rate for ADU residents observed in Portland. Instead, we calibrated our assumptions to Seattle's context by adjusting the ratio of ADU- and renter-household vehicle ownership in Portland by Seattle's renter-household vehicle ownership rate (see Equation 1 in Appendix B). We further refined our assumptions to Seattle by considering the average number of bedrooms per rental unit not just in Seattle compared to Portland overall, but within each parking study location. Finally, we conservatively adjusted our assumption about vehicle ownership among ADU renters upward compared to the overall renter population to reflect the fact that, in general, ADUs in single-family zones are relatively further from frequent transit than other rental housing.
- 10** Please see the frequent comment response related to neighborhood-level analysis and previous response to comment 6 related to parking.
- 11** The issues noted by the Hearing Examiner include expanding the assessment of housing and displacement impacts. Section 4.1, Housing and Socioeconomics, describes the potential impacts to both from the proposed Land Use Code changes.
- 12** As outlined in Section 1.2, Proposal Objective, the objectives of this proposal are to remove regulatory barriers to make it easier for property owners to permit and build ADUs and to increase the number and variety of housing choices in single-family zones.

As outlined in Section 4.1, housing affordability would remain a concern and burden for many Seattle residents under all alternatives evaluated including Alternative 1 (No Action). However, compared to Alternative 1 (No Action), Alternative 2, Alternative 3, and the Preferred Alternative would all have marginal benefits with respect to housing affordability; would decrease the potential for economic displacement by reducing

upward pressure on rents and housing prices; and reduce the potential for physical displacement by reducing the number of teardowns. As a result, no mitigation is required.

- 13** As outlined in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would result in the creation of 2,310 additional ADUs under Alternative 2, 1,430 additional ADUs under Alternative 3, and 2,460 additional ADUs under the Preferred Alternative compared to Alternative 1 (No Action). While construction cost certainly impedes construction of additional ADUs, the analysis in the EIS shows that existing regulations also act as a barrier.

The City is considering a range of strategies and tools outside of Land Use Code regulations that could help produce ADUs with lower rents and reserved for lower-income households and/or make it possible for homeowners with relatively lower incomes to create an ADU. See Section 3.2, Planning Context, for additional details. These possible strategies are not a specific proposal or action, and they are outside the scope of this EIS; we provide them for your information.

- 14** The EIS discusses how Seattle's short-term rental regulations affect properties with ADUs. See page 3-28 for information about this policy, which would apply under all alternatives considered in the EIS.

No data exists to confirm or deny the number of ADUs currently used as short-term rentals. However, the EIS does explicitly study the highest and best use of ADUs including as potential short-term rental housing. Specifically, the EIS considers short-term rentals in the pro forma analysis, whose results and methodology are presented in Section 4.1, Housing and Socioeconomics, and discussed in detail in Appendix A. Please see Exhibit A-28, Exhibit A-33, Exhibit A-38, and Exhibit A-43 for estimates of residual land values resulting from several ways of valuing ADUs, including as short-term rentals, in different market areas and on different lot types across Seattle's single-family zones

- 15** As described in Section 1.2, Proposal Objective, the objectives of the proposed Land Use Code changes are to remove regulatory barriers to make it easier for property owners to permit and build ADUs and to increase the number and variety of housing choices in single-family zones. Section 4.1, Housing and Socioeconomics, describes how the proposal could also have marginal benefits for housing affordability by increasing housing supply, increasing the number of smaller units available, and reducing the number of existing homes demolished compared to Alternative 1 (No Action). Please also see the frequent comment response related to housing affordability.

This EIS discusses impacts on housing affordability and displacement in Section 4.1. This section includes estimates of ADU production and single-family teardowns likely to occur under each alternative (see Appendix B for a full methodology). In general, the EIS considers an increase in housing supply to have the effect of reducing upward pressure on rents that results from competition for scarce housing, thereby marginally reducing economic displacement pressure through more housing choices. The EIS also considers the number of single-family teardowns in each alternative and understands that fewer demolitions suggests lower potential for physical displacement.

In this EIS, the phrase "upward pressure" in general refers to the phenomenon wherein population growth leads to increased competition for a finite number of homes on the market, resulting in higher prices as sellers respond to increasing demand and purchasing power among higher-income households. Given the many complex and interdependent factors that contribute to and determine housing costs, it would be speculative to project a specific increase in housing costs for each alternative.

The estimated number of teardowns for each alternative is quantified in Exhibit 4.1-15. In general, the phrase "marginally more teardowns" means slightly more teardowns. As shown in Exhibit 4.1-15, the estimated number of teardowns in Alternative 2, Alternative 3, and the Preferred Alternative is lower than Alternative 1 (No Action) due to policy changes contemplated in each alternative, including removal of off-street parking and owner-occupancy requirements and/or addition of an FAR limit for development in single-family zones. These changes tend to reduce the relative feasibility of demolishing a house and building one large new house compared to development that includes ADUs.

The phrase "displacement pressure" refers to the likelihood of involuntary dislocation that households face. The EIS estimates potential direct displacement due to demolition of existing housing (see Exhibit 4.1-15). While not all demolished single-family homes result in the displacement of a low-income household, the production model used in Section 4.1 results in an estimate of lots in the study area where the existing single-family house would be torn down and rebuilt. Economic displacement is more difficult to estimate. To evaluate displacement impacts, the EIS considers that greater ADU production likely increases rental housing options in the study area, thereby moderating housing price increases and reducing economic displacement pressure. The EIS also considers that greater ADU production allows more households to benefit from rental revenue, though we recognize that, absent other actions, overall construction costs will tend to limit ADU development to homeowners with relatively higher income under all alternatives.

16 Please see previous response to comment 15 related to affordable housing.

Further, as outlined in Section 4.1, Housing and Socioeconomics, the pro forma analysis specifically considers the probability of various development outcomes on parcels of different sizes and in different parts of the city. The analysis considers the financial performance of 44 legally permissible development outcomes. For example, a property owner could tear down an existing structure and build a new house (with or without an ADU); or they could keep an existing house and do nothing, remodel, or add an ADU. The results of the pro forma analysis are presented in Exhibit 4.1-13. Compared to Alternative 1 (No Action), the results suggest that Alternative 2 and Alternative 3 would not increase the likelihood that a property owner would demolish existing housing.

Among the results presented in Exhibit 4.1-13 for 48 distinct scenarios — an evaluation of four parcel types, in three market areas, for each of four alternatives — in no case is tearing down an existing house to build a new house with one or two ADUs the most feasible development outcome. The analysis indicates that, in some cases, the highest and best use of property shifts from demolition of existing housing under Alternative

1 (No Action) to preserving existing housing and adding one or two ADUs, an outcome that reduces demolition and displacement and creates new housing options.

Exhibit A-28, Exhibit A-33, Exhibit A-38, and Exhibit A-43 present estimates of residual land value for different valuation options for each parcel type, in each market area, for each of the four alternatives. In no scenario is renting all units the most feasible outcome for a property owner under any alternative. Likewise, renting one ADU as a short-term rental (Seattle's short-term rental regulations would not allow two ADUs on the same lot to be used as short-term rentals) is not the most feasible development outcome on any parcel type, in any market area, across all alternatives. Further, these exhibits show that the Land Use Code changes contemplated in Alternative 2, Alternative 3, and the Preferred Alternative would increase the relative feasibility of preserving housing and adding ADUs (thereby reducing demolitions and physical displacement) compared to Alternative 1 (No Action).

- 17** The EIS assumes that reducing regulatory barriers would increase the number of ADUs produced. This approach allows us to identify potential environmental impacts resulting from ADU construction. The pro forma analysis considers the policy changes included in each alternative and informs the forecast model that estimates ADU production.

As outlined in Section 4.1, the proposed Land Use Code changes would result in the creation of 2,310 additional ADUs under Alternative 2, 1,430 additional ADUs under Alternative 3, and 2,460 additional ADUs under the Preferred Alternative compared to Alternative 1 (No Action). While costs are certainly an additional impediment to construction of additional ADUs, our analysis indicates that the current Land Use Code also serves as a barrier.

See Exhibit 3-21 for a chart of ADU production in Seattle from 1994 to 2017. Between 2010 and 2015, 307 DADUs were permitted, an average of slightly more than 51 per year. In 2016 and 2017, 247 DADUs were permitted, an average of about 124 in the last two years. Construction costs have increased in recent years and thus do not explain the increased rate of ADU production.

- 18** See Appendix A for a detailed description of the methodology for the highest and best use analysis. The analysis considers the presence or absence of an owner-occupancy requirement in each alternative; the potential for smaller lots to have DADUs if the minimum lot size is lower; and the financial consequences of allowing larger DADUs, like slightly greater construction cost and higher rents. While a "traditional property owner" might create an ADU for reasons unrelated to profit, like creating additional living space or to house family members, the pro forma analysis evaluates development outcomes from the perspective of a profit-maximizing owner or developer. We consider, for example, whether it is more profitable to value a house and its ADU(s) as square footage on the for-sale market, as long-term rental units, with a short-term rental unit, or a combination of these.
- 19** As described in Section 4.1, Housing and Socioeconomics, and Appendix A of the Draft EIS, the EIS analyzes how each alternative might change the highest and best

use in the study area. This approach allows us to explicitly analyze this question. The highest and best use analysis evaluates which development outcome(s) would maximize return on investment from the perspective of a profit-maximizing developer. The analysis compares the financial performance of 44 development outcomes under a range of valuation options, including scenarios in which a house with ADU(s) is treated as a multifamily rental property. In no scenario is renting all units the most feasible outcome for a property owner under any alternative. See Exhibit A-25 through Exhibit A-39 for detailed analysis results from the highest and best use analysis.

- 20** The EIS relies on detailed analysis and study of the potential effects of the Land Use Code changes and ties the results of the study to support the conclusions in the EIS. The EIS quantitatively evaluates how many new ADUs would be created by the proposed Land Use Code changes and evaluates how the proposed changes to the rate of ADU production would impact the elements of the environment, providing a basis of comparison among the alternatives considered in the EIS.
- 21** The highest and best use analysis and ADU production estimates generally suggest that, similar to past trends, future ADU development will tend to be distributed across parcel types and market areas. See Section 4.1, Housing and Socioeconomics, for discussion of market areas that may see marginally different rates of ADU production. Each section of the EIS then considers potential impacts of population increases using a methodology appropriate for the area of the environment in question. While production estimates suggest ADU production is likely to remain distributed, the EIS acknowledges that localized impacts could occur if ADU production is particularly concentrated in an area, such as a single block. The EIS also considers anticipated population increases due to ADU production in the context of 20-year growth estimates evaluated in the Final EIS for the Seattle 2035 Comprehensive Plan.
- 22** The Full Build-Out scenario was included only in the aesthetics analysis to illustrate a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. As noted in Section 4.3, we do not expect this scenario to occur, but we include it in the results section beginning on page 4-95 to illustrate the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.
- 23** Construction of new ADUs would continue to be subject to all requirements of the Seattle Fire Code, including fire department access requirements to units.
- 24** The Full Build-Out scenario was included in the aesthetics analysis to show a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it to illustrate the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.

- 25** SEPA requires disclosure of likely significant impacts. No significant impact was identified here either because the impacts are minimal overall or because the impacts have been mitigated.

The Full Build-Out scenario was included in the aesthetics analysis to show a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it to illustrate and compare the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.

- 26** Please see updated illustrations in Section 4.3, Aesthetics. For analysis related to the effects of the proposal on parking availability, please refer to Section 4.4, Parking and Transportation. The aesthetics analysis is not intended to evaluate parking availability or impacts on parking. We show vehicles for illustrative purposes only.

See Section 4.3, Aesthetics, for a discussion of impacts of each alternative. Section 4.3 follows the illustrations of development scenarios under each alternative and analyzes whether and how each policy change is likely to result in changes to height, bulk, and scale. In particular, Exhibit 4.3-13, Exhibit 4.3-22, Exhibit 4.3-31, and Exhibit 4.3-40 show potential changes to views from rear yards in each alternative. The proposal does include a change to the maximum rear yard coverage limit only for DADUs with a total height of 15 feet or less. The policy is intended to make it easier for owners to create one-story DADUs appropriate for people with limited mobility, people with disabilities, and aging in place. The proposal to increase the rear yard coverage limit would not adversely affect privacy. In fact, the current rear yard coverage sometimes limits an owner's ability to create a usable living space on one story, thereby incentivizing construction of a taller and more visually impactful two-story DADU, which has greater impacts on privacy than a one-story DADU. See Section 4.3, Aesthetics, for a visual illustration of this proposed change to the rear yard coverage limit.

Please see Section 4.2, Land Use, for a discussion of impacts of each alternative on tree canopy. In particular, please see Exhibit 4.2-8 and Exhibit 4.2-9, both added in the Final EIS. Please also see Exhibit 2-2 (new in the Final EIS) and the discussion of rear yard coverage on page 2-13, which together explain that the Preferred Alternative would allow rear yard coverage above the current limit of 40 percent only if the DADU does not result in the removal of trees.

- 27** A 3,200-square-foot lot does not enjoy an exception from maximum lot coverage limits. As established in Seattle Municipal Code 23.44.010, the maximum lot coverage allowed for principal and accessory structures depends on lot size. For lots 5,000 square feet and larger, the maximum coverage allowed is 35 percent of lot area. For lots under 5,000 square feet, the maximum coverage is 1,000 square feet plus 15 percent of lot area. These calculations apply whether or not the lot has an ADU. Further, this standard applies equally across all alternatives, including Alternative 1 (No Action); no change to the maximum lot coverage limit is proposed.

Under all alternatives, the lot coverage limit applies to principal and accessory structures combined. For all lots, regardless of size, the same area can be covered by a single-family house as can be covered by a single-family house and an ADU.

The proposal does include a change to the maximum rear yard coverage limit only for DADUs with a total height of 15 feet or less. The policy is intended to make it easier for owners to create one-story DADUs appropriate for people with limited mobility, people with disabilities, and aging in place. The proposal to increase the rear yard coverage limit would not adversely affect privacy. In fact, the current rear yard coverage sometimes limits an owner's ability to create a usable living space on one story, thereby incentivizing construction of a taller and more visually impactful two-story DADU, which has greater impacts on privacy than a one-story DADU. See Section 4.3, Aesthetics, for a visual illustration of this proposed change to the rear yard coverage limit.

Please also see Exhibit 2-2 and the discussion of rear yard coverage on page 2-13, which together explain that the Preferred Alternative would allow rear yard coverage above the current limit of 40 percent only if the DADU does not result in the removal of trees.

- 28** As outlined in Section 4.5, Public Services and Utilities, the analysis of the potential impacts to public service and utilities in the EIS for the Seattle 2035 Comprehensive Plan was incorporated by reference into the EIS. The Comprehensive Plan EIS and this EIS both consider the same question: How does projected growth in the city affect the ability of public services and utilities to provide adequate service? The Comprehensive Plan EIS thoroughly analyzed the potential impacts to public services and utilities from a projected growth of 70,000 households in the city through 2035, including approximately 8,400 households in areas outside designated urban villages. Since the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS, we considered the estimated increase in households from the proposed Land Use Code changes and evaluated the impacts in the context of the changes analyzed in the Comprehensive Plan EIS.

In addition, Seattle Public Utilities provided input during the scoping period and DEIS public comment period. SPU recommended that when homeowners convert areas below grade to ADUs (or to any other habitable space), they should demonstrate compliance with the requirements of Seattle Plumbing Code section 710 which requires backflow prevention on fixtures installed on a floor level that is lower (in elevation) than the next upstream manhole cover of the public sewer. SPU noted that the increase in sewer demand resulting from ADU construction will not substantially impact sewer capacity. However, they further noted, as outlined in the EIS, that there could be localized impacts if ADU production is higher in a concentrated area, such as a particular block in the study area.

- 29** The results of the ADU production model in Section 4.1, Housing and Socioeconomics, suggest that, through ADU development, the Preferred Alternative could result in approximately 4,430 additional households over 10 years compared to Alternative 1 (No Action). The results show that these additional ADUs are likely to be distributed across all market sub-areas and all parcel types evaluated in the analysis. Because changes in

the relative feasibility of constructing ADUs between Alternative 1 (No Action) and the Preferred Alternative are similar across these different geographies and parcel types, and because neighborhoods tend to be similarly heterogenous with respect to parcel type as shown in Exhibit A-24, we anticipate that ADU production would be generally dispersed throughout Seattle. This would continue the pattern observed empirically in historical permit data, as shown in the distribution of existing ADUs in Seattle in Exhibit 4.1-1.

- 30** The EIS is a programmatic environmental impact statement that uses an appropriate level of analysis to evaluate the effects of a broad proposal that may include a wide range of individual projects, and that may be implemented over a long timeframe, and/or across a large geographic area. SEPA does not require that the City prepare separate analyses or documents for each ADU constructed.

For programmatic proposals, SEPA Rules require that an EIS contain only a general discussion of the impacts of alternative proposals for plans, land use designations, or implementation measures; site specific analyses are not required for individual geographic areas (WAC 197-11-442(3) and (4)). Therefore, analysis of certain impacts is appropriate at a broader scale that does not detail impacts at a project level or sub-areas scale for some aspects.

This EIS includes information about how conditions vary across Seattle neighborhoods. Please see Exhibit 4.4-6 for a map identifying unimproved sidewalks in Seattle. See also Exhibit 4.4-10, Exhibit 4.4-11, and Exhibit 4.4-12, which identify the existing transit network and illustrate areas of Seattle according to their proximity to frequent transit, respectively. Please see Exhibit 4.2-8 for a map added to the Final EIS illustrating tree canopy in the study area. Please see Chapter 3, History and Planning Context, for discussion and several exhibits illustrating the variation in cultural, economic, and social conditions across the city. In particular see Exhibit 3-12, which shows population by race, and Exhibit 3-15, which shows housing tenure across the city. See also Exhibit 4.1-16, Exhibit 4.1-18, and Exhibit 4.1-19, which present further information about demographic and socioeconomic variation across neighborhoods in the study area.

Reichert, William and Geness

- 1** Thank you for your comment. The comment is noted.
- 2** Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

Rental Housing Association of Washington

- 1** Thank you for your comment. The comment is noted.
- 2** The city is not considering a change to the zoning classification as part of the proposed Land Use Code changes. This suggestion is outside the scope of the analysis.
- 3** Please see Section 3.2, Planning Context, for information added in the Preferred Alternative and a discussion of additional strategies related to reducing permitting costs.

- 4 Thank you for your comment. The comment is noted.
- 5 The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to non-conforming house types and uses are not considered as part of the proposed Land Use Code changes and are outside the scope of the EIS.
- 6 The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations that would modify minimum lot size requirements or changes to lot subdivision regulations to create a new principal unit are outside the scope of the EIS.
- 7 Thank you for your comment. The comment is noted.

Ritzman, Mary

- 1 Thank you for your comment. The comment is noted.

Roll, Helen

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 3 Thank you for your comment. The comment is noted.

Ross, Chuck

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 2 Thank you for your comment. The comment is noted.

Rowen, Suzanne

- 1 Thank you for your comment. The comment is noted.

Roxby, Alison

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 The Draft EIS was issued with a notice of availability and the methods of publication required in SMC 25.05.510 Public Notice.

Rulifson, Brian

- 1 Thank you for your comment. The comment is noted.

- 2 The analysis of the potential impacts to public services and utilities in the EIS for the Seattle 2035 Comprehensive Plan (Seattle 2015 and Seattle 2016) is incorporated by reference into this EIS. The Comprehensive Plan EIS and this EIS both consider the same question: How does projected growth in the city affect the ability of public services and utilities to provide adequate service? The Comprehensive Plan EIS thoroughly analyzed the potential impacts to public services and utilities from a projected growth of 70,000 households in the city through 2035, including approximately 8,400 households in areas outside designated urban villages. Since the study area, potentially affected resources, and timeframe for this EIS all fall within what was considered in the Comprehensive Plan EIS, we considered the estimated increase in households from the proposed Land Use Code changes and evaluated the impacts in the context of the changes analyzed in the Comprehensive Plan EIS.
- 3 As noted in Section 4.5, Public Services and Utilities, Seattle Public Schools plans for student populations changes in the facility planning and is actively planning for future growth.

Scherba, Elaine

- 1 Thank you for your comment. The comment is noted.

Scherba, Stephen

- 1 Thank you for your comment. The comment is noted.

Schneider, S.

- 1 Thank you for your comment. We were unable to open the attachment and did not receive a response to requests to provide an alternative.

Schweinberger, Sylvia

- 1 Thank you for your comment. The comment is noted.

Seattle Planning Commission

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes allowing two ADUs (either two attached or one attached and one detached). Allowing for multifamily structures is outside the scope of this EIS; please see the frequent comment response concerning multifamily zoning.
- 3 The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 4 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 5 The Preferred Alternative includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet.

- 6 The Preferred Alternative would increase the maximum size of a DADU to 1,000 square feet.
- 7 The Preferred Alternative includes allowing additional height for DADUs depending on lot width.
- 8 The Preferred Alternative includes allowing for additional rear yard coverage for a single-story DADU provided construction does not result in tree removal.
- 9 The Preferred Alternative would increase the maximum household size to up to 12 unrelated people if a lot has two ADUs.
- 10 The Preferred Alternative does not include an affordability requirement.
- 11 The Preferred Alternative includes an FAR limit, with an exemption for any floor area in an ADU f to incentivize ADUs.
- 12 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 13 See response to comment #12 above.

Seattle Public Utilities

- 1 Please see Section 4.5, Public Services and Utilities, for updates to the discussion on sewer and stormwater impacts.
- 2 Thank you for your comment. The comment is noted.

Seattle Urban Forestry Commission

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 2 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 3 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 4 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 5 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 6 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 7 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

- 8 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use and exceptions added to the Preferred Alternative to preserve trees.
- 9 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 10 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes an FAR limit in single-family zones.

Sequeira, Debra

- 1 Thank you for your comment. The comment is noted.

Siegfriedt, Sarajane

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs. Please also see Section 4.1, Housing and Socioeconomics, for a discussion of how removing the owner-occupancy requirement meets the objective of the EIS to increase ADU production.
- 3 Thank you for your comment. The comment is noted.

Sightline

- 1 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 2 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative and the owner-occupancy requirement. See Section 4.1, Housing and Socioeconomics, for analysis of removal of the owner-occupancy requirement.
- 3 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 4 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 5 Thank you for your comment. The comment is noted.
- 6 Thank you for your comment. The comment is noted.
- 7 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 8 The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Modifying the definition of household size that applies to all zones is outside the scope of the EIS.

- 9 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 10 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 11 Please see Section 4.1, Housing and Socioeconomics, for updated text that provides more detail on the FAR limit included in the Preferred Alternative.
- 12 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.

Smith, Alan

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.

Steckler, Mike — 1

- 1 Thank you for your comment. The comment is noted.

Steckler, Mike — 2

- 1 All comments submitted on the Draft EIS have been included and are publicly available in this Final EIS.

Stixrod, Carl

- 1 Thank you for your comment. The comment is noted.

Sucher, David — 1

- 1 Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative and updated discussion of MHA.

Sucher, David — 2

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The discussion in Appendix A has been updated in this Final EIS.

Sutherland, Loretta

- 1 Please see Section 4.2, Land Use. This section has been updated to include a discussion of parks and open space.
- 2 Thank you for your comment. The comment is noted.

- 3 Thank you for your comment.

Taylor, Patrick

- 1 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 2 The Preferred Alternative includes reducing the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet. Please also see the frequent comment response concerning request for greater flexibility than contemplated in Alternative 2 or 3.
- 3 The Preferred Alternative would remove the owner-occupancy requirement for ADUs.
- 4 The Preferred Alternative includes allowing two ADUs (either two attached or one attached and one detached).
- 5 The Preferred Alternative includes allowing additional height for DADUs and would increase the maximum size of a DADU to 1,000 square feet.
- 6 The Preferred Alternative includes allowing for additional rear yard coverage for a single-story DADU provided construction does not result in tree removal.
- 7 Please see Chapter 2, Alternatives, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs.
- 8 The Preferred Alternative includes an FAR limit, with an exemption for any floor area in an ADU to incentivize ADUs.
- 9 The Preferred Alternative does not include an affordability requirement.

Tenenbom, Buzz

- 1 Please see the frequent comment response regarding individual neighborhood review.
- 2 Please see the frequent comment response concerning impacts to parking.
- 3 Thank you for your comment. The comment is noted.
- 4 Thank you for your comment. The comment is noted.

TreePAC.org, Ellison, Richard

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 2 SEPA regulations require a 30-day public comment period with a 15-day extension upon request. The public comment period for this EIS was for 45 days to give the public extra time to contemplate the proposal.
- 3 Additional discussion of impacts to tree canopy has been added to Section 4.2 of this Final EIS.
- 4 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

- 5 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 6 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 7 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 8 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 9 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 10 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 11 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 12 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 13 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 14 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

University Park Community Club

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding individual neighborhood review.
- 3 Thank you for your comment. The comment is noted.
- 4 Thank you for your comment. The comment is noted.
- 5 Please see Section 4.2, Land Use. This section has been updated to include a discussion of historic resources.
- 6 Thank you for your comment. The comment is noted.
- 7 Thank you for your comment. The comment is noted.
- 8 Thank you for your comment. The comment is noted.
- 9 Thank you for your comment. The comment is noted.
- 10 Thank you for your comment. The comment is noted.

Wall, Irene

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response regarding parking impacts.

- 3 Thank you for your comment. The comment is noted.
- 4 Thank you for your comment. The comment is noted.
- 5 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.
- 6 As outlined in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would result in the creation of more ADUs under Alternative 2, Alternative 3 and the Preferred Alternative compared to Alternative 1 (No Action). While construction cost certainly impedes construction of additional ADUs, the analysis in the EIS shows that existing regulations also act as a barrier.

Warner, Kurt

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Alternative 1 is the No Action Alternative. It considers the potential impacts from existing Land Use Code regulations. Please see Chapter 2, Alternatives, for a discussion of an ownership requirement included in the Preferred Alternative.
- 4 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 5 Thank you for your comment. The comment is noted.

Wilkins, Steve

- 1 Thank you for your comment. The comment is noted.

Williams, Bonnie

- 1 Thank you for your comment. The comment is noted.
- 2 Please see the frequent comment response concerning impacts to parking.
- 3 Please see the frequent comment response regarding individual neighborhood review.

Williamson, Bill

- 1 Thank you for your comment. The comment is noted.
- 2 The proposal evaluated in the EIS considers changes to the Land Use Code for the construction of ADUs in single-family zones. Creating a new overlay zone is not considered as part of the proposed Land Use Code changes and is outside the scope of the EIS.

Woods, Jerry

- 1 Thank you for your comment. The comment is noted.

5.4 Responses to Comments Submitted through the Online Comment Form

This section includes Draft EIS comments submitted through our online comment form and provides responses to those comments. They are listed in alphabetical order according to last name. Note that the comment form included fields for name and email address. Many commenters left the name field blank. In these cases, rather than identify commenters by their email addresses, we list these comments as "anonymous."

We present online comments and responses in the following format:

Commenter name

Online comment.

» **Response to online comment.**

Exhibit 5-3 Commenters Providing Comments through the Online Comment Form

Commenter	
Abolins, Talis	5-90
Adams, Ryan	5-91
Adkins, Matt	5-91
Alexander, Noelani	5-91
Alexander, Zachary	5-92
Amster-Burton, Laurie	5-93
Andreini, Elizabeth	5-93
Ankrom Moisan Architects	5-93
Baab, Mike	5-94
Badwin, Emory	5-94
Balsky, Sonia	5-95
Basom, Ezra	5-96
Baumgarten, Eric	5-96
Becker, Arnold	5-96
Becker, Dan	5-96
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RESPONSES TO COMMENTS SUBMITTED THROUGH OUR ONLINE COMMENT FORM

Abolins, Talis

The alternatives should include features necessary to minimize displacement risk, and incentivize affordable units. For instance, how about conditioning the creation of the third unit on rent restriction? Ownership of DADU and ADU should remain with the property owner.

- » **Please see Section 4.1 for a discussion of displacement and Section 3.2, Planning Context, for information related to costs and financing.**

See above. The ADU / DADU program is an important opportunity to minimize displacement for owners struggling with increasing property tax burdens. If a third unit is allowed, it should be subject to an affordability performance requirement -- with affordability options for either rent restriction, or an ownership sales price restriction tied to an objective benchmark, and protected by covenant.

- » **Please see Section 3.2 Planning Context, for information related to costs and financing**

The ADU / DADU presents a rare opportunity for existing Seattle residents to stay in place, and generate revenue to offset tax burdens (for seniors and others) and avoid displacement. Some of the graphics showing the multiple DADU's on a city lot reflect substantial damage to neighborhood landscapes, tree canopy, architecture, and historic value. Balance is the key"" mitigation should be more thoughtfully outlined, so the decisionmakers can assess the true impacts and the options to manage these threats. There must be restrictions on the VRBO conglomerates that are buying up small units around the City -- removing them from housing stock, and profiting with transitory residents and, in some cases, illegal activities (prostitution in VRBO units is confirmed on Capitol Hill). A VRBO ADU can avoid displacement for a Seattle resident facing rising property taxes "" and facilitate extended family support arrangements. Vacation rental activity should be limited to owner-occupied ADU and DADU's. Don't let the lobbyists bake the cake again. Corporate VRBO and Air B&B operators are making a killing with little benefit for the City.

Historic districts (federal, state and/or local) must be considered and mitigated from these DADU opportunities. A design review process should kick in to require accommodation of architectural character for DADU's within or adjacent to historical resources -- and to the extent the City has not yet documented the existence of these resources in the EIS -- it should do so, or at least have a mitigation strategy that allows adjacent residents notice and an opportunity to identify adjacent historic resources in areas not yet surveyed by the City

- » **Please see Section 4.2, Land Use. This section has been updated to include a discussion of historic resources. Please see Chapter 3, History and Planning Context, for information added in the Final EIS on the City's short-term rental regulations.**

The graphics demonstrate the potential for severe impacts on land use bulk and scale, as well as aesthetics and historical resources. Design review must be enhanced to avoid the substantial risk of harm to these EIS values.

- » **Please see Section 4.2, Land Use, for the analysis of potential impacts from changes to density and scale and a new section added in this Final EIS that discuss Historic Resources. Please also see Section 4.3, Aesthetics, for analysis of aesthetics impacts.**

Adams, Ryan

I strongly support Alternative 2. We don't need more parking. I'm in my 30's. Most of my friends don't own cars or drive regularly.

» **Thank you for your comment. The comment is noted.**

Adkins, Matt

Housing prices are rising dramatically in Seattle and in the suburbs as our city continues to grow to more than 700,000 people, and we will probably continue to grow for the foreseeable future. I think that we should create more opportunities to build homes so that the supply of homes can keep up with our population growth. I believe that encouraging more ADUs and DADUs to be built in the city can help increase the supply of homes and provide more opportunities for people.

» **Thank you for your comment. The comment is noted.**

Cities like Portland and Vancouver BC seem to be also trying to add more ADUs and DADUs to their housing supply. Hopefully Seattle can monitor the performances and outcomes in those cities to determine best practices Seattle can follow.

» **The City has previously required ongoing monitoring of ADUs and may include that requirement in the final legislation.**

Alexander, Noelani

I have been eagerly waiting for this this EIS to finish and for the changes to DADUs to happen so we can build a structure at a price point that creating a rental will be a long term investment and will keep us in our home during our retirement.

» **Thank you for your comment. The comment is noted.**

I like to think the character of the neighborhoods will be better preserved with the addition of AADUs and DADUs then it might be with the construction of town homes, new construction, and other multi-family projects.

» **Thank you for your comment. The comment is noted.**

Alternative 2 would be an excellent way to increase the possibility that homeowners could build DADU's and AADU's in a cost effective way. Alternative 3 is still an improvement on the existing code, but would limit many options that would appeal to me, as a homeowner, who would like to build a DADU that would give me a rate of return worth investing in.

» **Thank you for your comment. The comment is noted.**

Watching the city change, as many long time residents are forced to leave due to the expensive and limited housing options has been difficult. I feel fortunate to be able to have a single family home in this city, and also fear that, in time, this will become less affordable for me as well. I do see this as a small part of a solution for keeping people in their homes as taxes increase and keeping low to mid income renters living in the city.

» **Thank you for your comment. The comment is noted.**

I do worry about parking in the Alternative 2. Ideally, we would not need off street parking in our neighborhoods because of the other transport options. However, parking will be a challenge for

individuals. My profession forces me to drive larger than average vehicles (work trucks) through our neighborhoods and I see the challenge getting worse, not better and removing the off street parking restriction on Alternative 2 is the only issue I have with the proposal.

» **Thank you for your comment. The comment is noted.**

Alexander, Zachary

My household is made up of 2 adults, 2 children, and a rotating cast of in-laws. I live in District 5. I want more housing because it's critical to address climate goals. Higher density allows more people to be closer to critical infrastructure like bus stops and grocery stores. Personally, I think I have the right to construct additional "in-law" housing in my backyard. I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing

elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Amster-Burton, Laurie

I support Alternative 2.

- » **Thank you for your comment. The comment is noted.**

Andreini, Elizabeth

Please make larger apartment developments provide off-street parking for residents to stop clogging up neighborhoods and business areas. Then it will be possible to absorb the additional cars in neighborhoods for houses which have "mother-in-law" cottages .

- » **Thank you for your comment. The comment is noted.**

I support allowing broader flexibility for "mother-in-law" cottages on single family lots. I believe that will substantially help younger and lower income individuals find places to live that are closer to work/ education opportunities and provide better access to public transportation.

- » **Thank you for your comment. The comment is noted.**

Please give families the flexibility to house extended family members or provide options for long-term rentals on their property. This will help increase density and allow more housing in the city as well as provide rental income options to offset rising costs of housing allowing more people to stay in the city and decrease traffic.

- » **Thank you for your comment. The comment is noted.**

Ankrom Moisan Architects

This comment is directed towards simplicity and alignment of zoning with financial lending. Dwelling units is a term in common through Building codes and Financial lending institutions. Accessory Dwelling units whether detached or attached is NOT a qualified term and traditional funding vehicles are NOT available at this time. Under FHA - up to 4 units may be financed as a single family home loan. By declaring a unit something other than dwelling unit, it confuses the financing agencies and reduces number of lending sources to fund the work. This adds unnecessary cost and time to process and works at cross purposes the the intended goal of creating more homes and affordable homes within single

family zoned city districts. Since the end goal is to increase the number of dwelling units within a single family housing zone, I propose that the terminology simply call the units 'Dwelling Units' and delete unnecessary nomenclature of AADU or DADU that creates confusion with funding and lending agencies. For example, the number of dwelling units on a single family zoned property may be increased from 1 dwelling unit to 4 dwelling units when the following provisions are met....

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs. Please also see the frequent comment response discussing multifamily zoning, which defines those terms and distinguishes accessory units and other dwelling types.**

Baab, Mike

Part of transitioning away from car dependence requires no longer subsidizing parking. I support any initiative that removes mandatory parking requirements.

- » **Thank you for your comment. The comment is noted.**

I vastly prefer Alternative 2. We need more housing in this city. The solution is obvious: Make it as easy as possible to build all housing types, including ADU/DADUs

- » **Thank you for your comment. The comment is noted.**

I'm disappointed that this process has been delayed for so long. I'd like ADUs/DADUs to be expanded and for the EIS process to not be weaponized for delay in the future. It needs to be easier for cities to do the right thing. This was an easy choice 3 years ago and it's an easy choice now.

- » **Thank you for your comment. The comment is noted.**

Everyone likes pretty neighborhoods. The problem comes when we prioritize them above our moral imperatives, such as housing the homeless and ensuring affordability in our city. Expand them.

- » **Thank you for your comment. The comment is noted.**

I am not concerned in the slightest about scale or neighborhood character. I want to live in a city where families of all income levels can stay. Accessory dwelling units are a huge part of this. Make it easier to build them.

- » **Thank you for your comment. The comment is noted.**

The evidence is clear, and has been for years: The existence of single-family zoning is a giveaway to the whitest and wealthiest Seattle residents. Do the right thing and expand the right to build ADU/DADUs.

- » **Thank you for your comment. The comment is noted.**

Let's adequately fund our public utilities!

- » **Thank you for your comment. The comment is noted.**

Badwin, Emory

8 unrelated people on one property should be the maximum. Any more than that, and there will be big impacts to noise and parking.

- » **Thank you for your comment. The comment is noted.**

I cannot tell you strongly enough how important I think it is that the owner occupancy requirement remain in place. I have seen too many absentee owners let their rental homes become 'party houses' that detract from the neighborhood. If the owner does not reside on the property, then they don't have much incentive to ensure harmony with neighbors. It's not fair to the other homeowners if an absentee owner lets their house be used by renters who don't care about their neighbors and reduce the quality of life in the neighborhood. This is a big, BIG deal to everyone I talk with about the ADU options. Please do NOT get rid of the owner occupancy requirement.

» **Thank you for your comment. The comment is noted.**

I prefer alternative #3 because I think it is very important that the owner occupancy requirement remain in place. I have seen too many absentee owners let their rental homes become 'party houses' that detract from the neighborhood. If the owner does not reside on the property, then they don't have much incentive to ensure harmony with neighbors. It's not fair to the other homeowners if an absentee owner lets their house be used by renters who don't care about their neighbors and reduce the quality of life in the neighborhood. This is a big, BIG deal to everyone I talk with about the ADU options. Please do NOT get rid of the owner occupancy requirement.

» **Thank you for your comment. The comment is noted.**

I think it is fine to not require an off-street parking space for a single ADU, but I feel strongly that there needs to be an off-street parking space for a second ADU. Parking has become so tight in Seattle, that we cannot afford to keep adding density without finding a place to put the cars. It's not fair to all of the other neighbors if there are 12 people living on one property who hog all of the parking along their street.

» **Thank you for your comment. The comment is noted.**

Balsky, Sonia

I am strongly in favor of Alternative 2. Alternative 3 is better than no action, but seems less permissive especially with regards to size, which is important. I think there should be very few barriers to building ADUs on any lot - in fact, I'd support a new option that further reduces lot size requirements and increases allowable ADU size and placement.

» **Thank you for your comment. The comment is noted.**

The visual character will be fine, and also, is not important compared to increasing needed housing options.

» **Thank you for your comment. The comment is noted.**

Alternative 2 definitely seems like the best choice given these factors as well.

» **Thank you for your comment. The comment is noted.**

Density is critical - finding ways such as this to increase density in single family zones will be very helpful.

» **Thank you for your comment. The comment is noted.**

More transit, less parking. Thank you forever.

» **Thank you for your comment. The comment is noted.**

Basom, Ezra

I hope policy makers will continue to explore ways to create incentives for landowners to build housing that serves moderate income families, there is a 'missing middle' in Seattle.

» **Thank you for your comment. The comment is noted.**

Existing zoning rules create housing types that favor the wealthy. The rules to add additional units should favor construction of lower cost housing. In addition to rental housing I strongly urge policy makers to consider options for homeowners to sell ADU units to individuals that are purchasing homes as part of a land trust such as Homestead Community Land Trust. The sale of homes as part of a land trust creates permanent affordable housing.

» **Thank you for your comment. The comment is noted.**

I strongly support removing regulatory barriers so that its easier to build additional housing units on single family zoned lots.

» **Thank you for your comment. The comment is noted.**

Laneway housing along alleys is athetically pleasing.

» **Thank you for your comment. The comment is noted.**

Single family zones in Seattle historically permitted many different housing types, many of the historical apartments and duplexs continue to exist in these neighborhoods. Returning to this model encourages housing diversity which in turn supports people who have different sized incomes and backgrounds. Existing policies create communities that are largely white and wealthy.

» **Thank you for your comment. The comment is noted.**

The notion that parking should be required for any housing creates a system that makes housing more expensive to build and less accessible to people of moderate incomes. Parking should not be required anywhere in my opinion.

» **Thank you for your comment. The comment is noted.**

Baumgarten, Eric

Remove single family zoning entirely from Seattle. It was born from classist and racist sentiment and continues those ideas into the present.

» **Thank you for your comment. The comment is noted.**

Becker, Arnold

I am opposed to changing single family neighborhoods into multi family units.

» **Thank you for your comment. The comment is noted.**

Becker, Dan

I support making it easier for property owners to permit and build ADUs and backyard cottages. Our city would greatly benefit from increasing the number and variety of housing choices available in single-

family zones. As a homeowner in a single family neighborhood I would not be unhappy to see every one of my neighbors do this.

- » **Thank you for your comment. The comment is noted.**

Beetem, Jennifer

I am in favor of Alternative 3 for its lower impact on tree canopy and vegetation.

- » **Thank you for your comment. The comment is noted.**

I am in favor of Alternative 3 for the reduced amount of teardowns of existing houses and greater spacing around redeveloped main houses under FAR. Maintaining a small amount of green buffer vs. building right to the property line not only improves aesthetics, it is good for people psychologically.

- » **Thank you for your comment. The comment is noted.**

I am in favor of Alternative 3. Although the number of affordable units created will be slightly lower, Alternative 3 will precipitate less displacement, which has devastated many Seattle communities.

- » **Thank you for your comment. The comment is noted.**

I prefer Alternative 3, specifically for the owner-occupancy requirement and the MHA requirement for a 2nd ADU/DDU. However, I would prefer to see incentives that result in affordable rents for rentable ADUs/DDUs rather than only paying into the affordable housing fund since the square footage for these units is so modest it will limit the impact of the affordability contribution. I am in favor of the owner-occupancy requirement to promote housing as housing and to ensure homeowners have a personal stake in the community they live in.

- » **Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative would remove the owner-occupancy requirement; two ADUs would be allowed only if the property is under the same ownership for at least one year.**

Does the parking usage projections include the fleets of carshare vehicles like ReachNow and Car2go that use street parking? Can we encourage homeowners to use their garages for cars instead of for storage?

- » **Please see Section 4.4, Parking and Transportation, for discussion of parking and transportation. Any carshare vehicles would have been counted as any other car parked on the street.**

Bicknell, Natalie

I wholehearted support the idea of ADUs in Seattle neighborhoods and I hope that this plan moves forward. I also hope that the City considers offering Housing Cooperatives the opportunity to build multifamily dwellings in single family zoned areas. We need to extend both affordable rental and ownership opportunities to city residents and Housing Cooperatives are an excellent means of increasing ownership. I live in a HOA townhome that is affordable and community focused and I would like to see other people have the same chance to secure similar ownership opportunities.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code change**

ADUs are an excellent way to increase density and maximize land use in single family neighborhoods while maintaining the general aesthetic and feel of the neighborhood.

» **Thank you for your comment. The comment is noted.**

Design is important and I am glad the City is taking steps to ensure that aesthetics are considered in this plan.

» **Thank you for your comment. The comment is noted.**

Parking and transportation scarcity are issues every growing city faces. I feel strongly that ADUs are a great means of increasing density because they allow for that density to occur as infill in neighborhoods throughout the city.

» **Thank you for your comment. The comment is noted.**

I strongly support making it easier for home owners to build ADUs.

» **Thank you for your comment. The comment is noted.**

ADUs are an important means of generating affordable housing and allowing home owners to collect revenue from their property.

» **Thank you for your comment. The comment is noted.**

bloom, gail

alternative 2 best reduces sprawl and therefore concentrates resources for public services... good services are expensive and should be well utilized. transit ridership works better when there is density - similarly all services function when there is concentration of effort - IMO.

» **Thank you for your comment. The comment is noted.**

housing is appropriate in existing residential districts. families are smaller now and so the numbers of residents per parcel could often be the same, even with a secondary unit. ownership is irrelevant to use. alternative 2 will likely produce more housing in established neighborhoods. seattle permitted housing to be developed where services were absent or underserved. that is the larger civic challenge in my mind.

» **Thank you for your comment. The comment is noted.**

parking is challenging throughout seattle. parking is analogous to musical chairs and building without it, assumes that your neighbor won't want a car. uber or whatever won't solve congestion - parking maybe - but it really causes more cars to circulate and slows overall travel speed - eating into transit ridership. alternative 2 reduces pressure to build in non-residential neighborhoods without schools and parks, because parents w kids for sure will still need to haul those children to sports with their bats and balls etc across town from childcare to school... and not on the backs of their bikes.

» **Thank you for your comment. The comment is noted.**

thank you for the opportunity to comment on the alternatives - i favor more flexibility, more than even contemplated by the zoning changes, but support the goals of alternative 2.3

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

alternative 2, the most permissive, is more protective of setbacks and rear yards than i would personally think is appropriate. multistory secondary units are by their nature inefficient w staircases and inaccessible for aging and disabled.

» **Thank you for your comment. The comment is noted.**

infill housing will reduce the gross impacts of new development in large complexes. existing neighborhoods have public resources than the new neighborhoods are missing - schools, libraries, parks, local retail - all things that make cities communities. alternative 2 best achieves that objective supporting more housing... the underlying real estate economics are more a function of external dynamic economy. a recession or downturn of a major sector would do more to impact the housing market's economic structure than this zoning change. think 2009 or boeing's impact in the 70s.

» **Thank you for your comment. The comment is noted.**

many single family neighborhoods have by my observation, large homes with large footprints. one wonders if those building additions were even built with permits or earlier zoning was just more permissive.

» **Thank you for your comment. The comment is noted.**

Bloom, Robert

Please adopt the following changes:

1. Lots in single-family zones should be entitled to have an AADU and a DADU or two AADUs.
2. No off-street parking should be required.
3. There should be no minimum lot size for an ADU.
4. In terms of size, should allow AADUs up to 1,200 square feet, excluding garage and storage areas, DADUs up to 1,200 square feet, excluding garage and storage areas. Additionally, AADUs or DADUs should be allowed to exceed 1,200 square feet if the portion of the structure in which the ADU is located existed on December 31, 2017, and if the entire ADU is located on one level.
5. Increase height limits by 1 to 3 feet higher than existing limits, depending on lot width. Allow 1 to 2 additional feet for a DADU that meets green roof standards.
6. The maximum household should be changed to allow any number of related people, or up to eight unrelated people, can live on lots in single-family zones with an AADU or a DADU. If the lot has an AADU and a DADU, the limit should be 12.
7. Height limit exceptions should be modified to allow for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.
8. The front entrance location for DADUs should be on any façade if they are 10 feet from the lot line and if located on the façades facing the nearest side or rear lot line (unless abutting right-of-way).
9. Impose Floor Area Ratio requirements. New construction should be subject to FAR limits in single-family zones. New houses (i.e., principal structures) should be subject to a FAR limit of 0.5 or 2,500 square feet, whichever is greater. Below-grade floor area and floor area in DADUs should be exempt. For existing houses in single-family zones exceeding the FAR or 2,500-square-foot limits should be allowed to convert existing space to an AADU and add a DADU subject to the size limit above.

10. In terms for rear lot coverage, the code should be changed so that 60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is 15 feet or less in height. Rear yard coverage for structures other than a DADU should not exceed 40 percent.

11. Find ways to reduce permitting costs.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Bostrom, Kevin

I support alternative 2

- » **Thank you for your comment. The comment is noted.**

Bradford, Ethan

I'd like to see a maximum density option. There are a couple of features in Option 3 that allow more density than Option 2, in particular allowing two AADUs. Given the severity of the housing shortage in Seattle, we need the most density we can reasonably achieve.

- » **Thank you for your comment. The comment is noted.**

Seems clear enough.

- » **Thank you for your comment. The comment is noted.**

Brandalise, James

As long as they are limited to rear yards, I will not--despite having an almost 18,000 square foot lot--be able to construct a DADU. My lot is over 285 feet long, but the house is situated at the rear, and the back yard is inaccessible for building.

I would very much like to construct a DADU, because despite owning my own home, I am close to being displaced by the rising tax burden. Being displaced from a home my father built with own hands in 1963, adjacent to the Rainier Beach urban farm that he grew up on (I am not very happy with Seattle at the moment).

- » **DADUs can be located in front of the main house if it is outside of the required front yard. Please see Exhibit 2-6 that illustrates required yards in single-family zones.**

I would be in favor of Action Alternative 2, although I do not believe that it provides enough financial incentives--fee reductions--to convince me to build a DADU, as much as I would like to.

- » **Thank you for your comment. The comment is noted.**

Bronson, Eric

I live in district 6, in Greenwood just off of Aurora. I wish that ADUs were plentiful in my neighborhood. That would make Greenwood a more vibrant place to live and play. It would also allow more folks of diverse income levels to live in an area that has high access to opportunities.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.
10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.
11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification.

Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Brooks, Kyle

I prefer as loose of regulations around building accessory units as possible. Excessive regulations like owner-occupancy and parking minimums slow down our ability to build new housing and therefore prevent housing costs from decreasing.

Of the options available, I support Alternative 2 as the best path forward for Seattle. However, I would prefer an even less restrictive approach to building accessory units that would allow for triplexes and quadruplexes in areas zoned for single family.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code and the frequent comment response regarding multifamily zoning.**

ADU's are a good way to strike a balance between redevelopment and preserving historical buildings because they allow homeowners to build housing adjacent, below, or on top of existing "legacy" structures. For this reason, ADU's will help preserve Seattle's architectural heritage.

- » **Thank you for your comment. The comment is noted.**

Too much of Seattle's growth has been absorbed by high-density areas, which tend to be poorer than single family areas. Allowing AADU's and DADU's to be built will help distribute the burden of Seattle's increasing population more equitably by allowing single family neighborhoods to make contributions to density.

- » **Thank you for your comment. The comment is noted.**

We cannot fight global warming without building dense housing. The environmental review process should remember that every ADU built in Seattle prevents sprawl in the suburbs and shortens commute times and greenhouse gas emissions.

- » **Please see the frequent comment response concerning the proposal's effects on climate change.**

We must eliminate single family zoning in Seattle.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to the underlying zoning are not considered as part of the proposed Land Use Code changes and are outside the scope of the EIS.**

Reducing car use is essential for fighting global warming. Also, advances in our region's public transportation, in self-driving cars, and in the availability and cost of electric bicycles are all dramatically decreasing the public's demand for street parking. For these reasons, I believe we should not have parking minimums for ADU's.

- » **Thank you for your comment. The comment is noted.**

Property taxes should be able to provide for the increased utilization of public services due to building ADU's.

Adding fees to the development of accessory units will reduce overall housing affordability.

- » **Thank you for your comment. The comment is noted.**

Brown, Richard

I support Alternative 1(No Action Alternative)

- » **Thank you for your comment. The comment is noted.**

Buhlmann, Glen

We need to make it easier to build more housing of every type in every part of the city. I support alternative 3. However, I don't think we need to require any parking even if 2 or 3 D/ADU's. We have too much parking already. Requiring more will just make the homes more expensive and this is only being considered to appease wealthy homeowners who feel that they own the on-street parking in their neighborhoods and anyone new who moves into the neighborhood wouldn't have any similar claim to owning it. This is nonsensical. Do not require additional parking.

- » **Thank you for your comment. The comment is noted.**

Every neighborhood has multi-family housing since it used to be legal everywhere in the city. We created single family zoning and setback requirements to artificially inflate the cost of housing in white neighborhoods to keep out people of color. Stop supporting these racist policies. They must go.

- » **Thank you for your comment. The comment is noted.**

It is not the city's business to worry about maintaining the wealth of landowners. This is not medieval/feudal times. The existing homeowners are not lords. Allowing ADU's will prevent displacement. It will allow cost-burdened homeowners to be able to afford their mortgages by giving them income from 1 or 2 ADU/DADU's.

- » **Thank you for your comment. The comment is noted.**

We need to abolish single family zoning. It was created for racist reasons to keep white neighborhoods white. The city cannot continue to support this relatively recent restrictive zoning. Townhomes and small apartment buildings used to be legal everywhere in the city. Stop listening to wealthy single family homeowners who are digging up every excuse they can think of so they don't have to admit that they don't want brown, black or not-wealthy people living near them.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units and rezoning single-family zones are outside the scope of the EIS.**

More housing. More housing of all types. More housing everywhere. Get rid of single family zoning and minimize setback requirements for all housing. These were created for racist reasons to segregate neighborhoods. Seattle needs to stop supporting these policies which are still allowing wealthy white neighborhoods to exclude others from living there.

- » **Thank you for your comment. The comment is noted.**

ADU/DADUs are for people with less income than those who own or rent SFH's. These are people who are less likely to own cars. It makes absolutely no sense to require any additional parking even if building 2 or 3 ADU/DADUs. Get rid of the parking requirement and choose the Alternative 3 which allows more ADU/DADUs

- » **Thank you for your comment. The comment is noted.**

This is nonsense. The number of homes we are talking about is infinitesimal. It will have no impact.

- » **Thank you for your comment. The comment is noted.**

Burke, Cynthia

I believe Alternative 2 is the path to take.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is the best option

- » **Thank you for your comment. The comment is noted.**

Alternative 2

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is the best option

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is the best option, although the owner should have the option to specifically say there is no parking for the unit and show a preference for non-car renters.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is the best option

- » **Thank you for your comment. The comment is noted.**

Thanks for sharing analysis. I think a property-tax reduction in exchange for below-market rental rates on DADU should be part of policy. Lower rents could allow more people who earn below median to live in the city. That includes new college grads, teachers, city workers, restaurant workers, etc.

Lower property taxes allow homeowner to limit tax costs after incurring significant costs to improve to their property to provide a rental.

The homeowner is taking on one of the social responsibilities - providing lower-income housing - that the city might otherwise have responsibility for - and should receive some tax relief as long as they rent -20% below market (or whatever a reasonable percentage would be).

While the homeowner may increase their equity by adding a DADU, until they sell the house and receive the equity, they are only taking on risk (the house may NOT increase in equity over time), taking on construction expense, and losing space and privacy. The ROI rate for a DADU with rents at market rates is about 6-8 years, not including property tax rate increases. The ROI rate with rent below market rates is about 10-15 years, not including property tax rate increases.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Burke, Paula

None of the action alternatives appear to have probable significant impacts. This EIS does an excellent job of demonstrating the overall lack of impacts from providing another option for addressing a critical housing shortage.

- » **Thank you for your comment. The comment is noted.**

I support the preferred alternative.

- » **Thank you for your comment. The comment is noted.**

Burns, Gust

I encourage the adoption of Alternative 2.

- » **Thank you for your comment. The comment is noted.**

I support the elimination of "single family zoning" and the legalization of plexes (duplexes, triplexes, fourplexes, etc.)

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code change**

I support the elimination of parking requirements.

- » **Thank you for your comment. The comment is noted.**

Cababa, Sheryl

The parking requirement needs to be removed. Our neighborhood has good access to public transportation, to bike shares, and alternatives to driving. It does not make sense to require parking as it's possible to reside in the neighborhood without a car. Most households -- including mine -- do not have space to add parking, but do have room to add an ADU or backyard cottage.

- » **Thank you for your comment. The comment is noted.**

The parking requirement needs to be removed. Our neighborhood has good access to public transportation, to bike shares, and alternatives to driving. It does not make sense to require parking as it's possible to reside in the neighborhood without a car. Most households -- including mine -- do not have space to add parking, but do have room to add an ADU or backyard cottage.

- » **Thank you for your comment. The comment is noted.**

Cantor, Clara

We need to allow multiple in-house and detached units. It doesn't make sense that a large home with a basement apartment or two in-house apartments can't make use of a large property to also build a backyard cottage. In fact, families already used to sharing space with others might even be more inclined to build a backyard cottage than others. Are we worried about creating too many homes for people to live?

Additionally, get rid of the unrelated occupants limit. I have lived over the course of my life with many people who were unrelated to me. This is not the city's concern, and is rooted in racist, classist, assumptions about renters. Similarly, the owner-occupancy rule is unnecessary and should be removed. If an owner were to have to suddenly move for any reason, it doesn't make sense to have to evict residents and board up their backyard houses. Renters are just as valuable to a neighborhood as homeowners, and the rules shouldn't treat them differently.

» **Thank you for your comment. The comment is noted.**

More height for green roofs. Don't we want people to help retain stormwater during big rains? Green roofs are ideal for Seattle and we should be actively encouraging and incentivizing their construction.

» **Thank you for your comment. The comment is noted.**

The permitting process needs to be streamlined - in our current affordable housing state of emergency we should be making it easier for people to create housing units, on their own properties, not more difficult.

» **Thank you for your comment. The comment is noted.**

Remove the parking requirement. Why would a city that claims to want to reduce driving and greenhouse gas emissions require people to build car parking spaces whether they own a car or not? The city is actively reducing parking requirements in other developments near public transit. Why keep this antiquated rule in play?

» **Thank you for your comment. The comment is noted.**

Population has actually decreased over the last 50 years in most of these areas zoned for single-family homes. This means that public utilities have not been growing with the city's actual population. Scaling public utilities for growth in single-family zones can happen and will happen the same as it's happened in all other zones in Seattle.

» **Thank you for your comment. The comment is noted.**

We should be planning a city with more urban density, and backyard cottages are a perfect way to do so. Restricting large swaths of valuable land to single-occupancy homes doesn't make sense from a land use perspective at all. Traditionally, backyard cottages are most often used by family members, friends, and others that are in need of an affordable place to live. Help Seattleites help others by allowing them to build backyard cottages.

» **Thank you for your comment. The comment is noted.**

Caroline Umeda

As someone who has lived in ADU units for 12 of the 14 years I have lived in Seattle, I am strongly in favor of removing regulatory barriers that currently limit the construction of these housing options. ADU units have been affordable, flexible, safe, and community-building housing options for me, and have substantially impacted my quality of life in a city where affordable housing has become extremely challenging to find. I believe ADU units bring needed diversity to Seattle's housing options. They offer flexibility for many individuals who are either new to Seattle, here on short term bases, in transition, or those looking to invest in a neighborhood community. As a graduate student, ADU units opened up neighborhoods close to the UW campus that otherwise would be off limits to me as a renter and someone living on a graduate student stipend. They allowed me the opportunity to invest in a neighborhood and build relationships with my landlords who owned and lived in the main portion of the homes. They offered flexibility in lease terms and other logistics that large property management

companies do not. ADUs are a key part of the solution to Seattle's affordable housing shortage and barriers to their construction must be addressed and removed.

» **Thank you for your comment. The comment is noted.**

Caron, Chad

The expense and effort of adding units to an existing property requires too much time for most home owners already struggling with time. The easier the city makes it to add density, the faster it'll address the housing crisis. Alt. 2 provided is a good start, but does not go far enough addressing the density required to maintain (let alone increase) affordability with the current zoning law. Make it easier.

» **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Alt. 2 is preferable for affordable housing development.

» **Thank you for your comment. The comment is noted.**

Alt. 2 is just relaxed enough to help encourage me to add a dadu to my property.

» **Thank you for your comment. The comment is noted.**

Cary, Cameron

Dear Ms. Pennucci and the Seattle City Council,

As Seattle rental rates are continuing to increase and home ownership is out of reach for many, many of my friends and colleagues are choosing to move out of Seattle for cheaper cities such as Tacoma, Bellingham, or Vancouver. Some are moving closer so they can still work in Seattle, but I myself am considering moving several hours away and finding new employment as Seattle is no longer a livable location for the middle class or under.

ADU's are a solution that everyone can love. By increasing housing stock, they help keep rental prices down and they provide flexibility for homeowners, who can leverage their positions to help defray their cost of living, while also providing housing for others. I strongly support additional housing, because want Seattle to be affordable, and households living in dense, transit-rich cities typically generate ¼ to ½ the climate-destroying CO2 of those displaced to the suburbs. Neither of the existing "alternatives" maximizes the benefits and flexibility, though Alternative 2 is a good start. I strongly urge the following changes, but only if they wouldn't trigger another round of EIS (we can't afford the delay):

NO PARKING REQUIREMENT because requiring parking for ADUs that means we're privileging space for cars over housing for people.

Lots should be allowed 2 ADU's and a DADU; we want to encourage the subdivision of existing large houses, especially for empty-nesters. If someone has divorced or their kids have left home and they have space for a DADU and also a 2500 square foot house, it's good for everyone if they can do 2 ADU's as well as the DADU: it creates more affordable units, and allows people to stay in their own homes when circumstances change. See this Portland study about "internal conversions".

Remove the owner-occupancy requirement; it discriminates against renters and greatly disincentivizes building ADUs. Would you build and rent out a backyard cottage if you knew that its

existence would block you from later moving out and renting your main house? Additionally, why shouldn't existing rental houses also be able to add ADUs?

Incentivize affordable rentals by eliminating development charges for units when owners commit to holding them as rentals affordable to people making under 60% AMI for 15 years.

Incentivize green building standards like passivhaus and "living buildings", by eliminating development charges on any units built to those standards.

Incentivize rentals of more than one month by lowering development charges for homeowners who commit to month-plus-long rentals for at least 10 years (to encourage rentals for residents, and not AirBNB units).

Streamline permitting by dedicating specialized reviewers to ADU/ DADU projects. With just three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots or green roofs, residents who want to build an ADU have a clear and predictable pathway through permitting.

No MHA Fees. MHA fees can add 15K+ to the cost of an ADU, thus making it less likely people will build them. Much better to lower costs on ADU's held affordable, as mentioned above.

Lower the minimum square footage for lots that can support DADU's and ADU's to 2500. A 2500 sq. ft. lot can easily support a 2-story house with a footprint of 800 sq. ft. and an ADU inside, and also a DADU with a 400 sq. foot footprint.

We need to enable ADU's, not just allow them. These changes could make a big difference to how much affordable new housing gets built.

Sincerely,

Cameron Cary

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Cassidy, Sean

The link for this chapter is incorrectly pointing to 4.3 Aesthetics.

Adding parking requirements will raise the cost of building ADUs, which will raise rents overall. Rising rents is only good for rich landlords and hurts poorer renters.

- » **Thank you for your comment. The comment is noted.**

Strong preference for Alternative 2, followed by Alternative 3

- » **Thank you for your comment. The comment is noted.**

ADUs have no significant negative effect on aesthetics

- » **Thank you for your comment. The comment is noted.**

Looser regulations (like Alternative 2) for ADUs will help keep families together, lower the rent burden, and not substantially change the neighborhood characteristics.

- » **Thank you for your comment. The comment is noted.**

Population density is a good thing and will help the environment overall

» **Thank you for your comment. The comment is noted.**

Strong support for ADUs!

» **Thank you for your comment. The comment is noted.**

CAST Architecture

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity through land use planning, and inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation.

» **Thank you for your comment. The comment is noted.**

Catalano, Gus

Alternative two is the best approach for two reasons:

- No Far Limit
- Aid with predevelopment costs

However Alternative 3 does have MHA requirements that should apply, for a 2nd ADU and that's should be incorporated into Alternative 3.

Additionally the lot coverage rules specially how they are not changed is not good. Neither of the Alternatives attempts to save this. In very small lots <5,000 sq ft, which is a lot of Seattle SFH, the houses already existing cover a significant amount. It would limit the size of ADUs in smaller lots to the point it's not worth it. On my particular lot, I wouldn't be able to build one larger than 300sq ft, that's barely a studio. I think the lot coverage limit should go through one of these changes:

- Increased for smaller lots to Lots less than 5,000 square feet: 1,000 square feet plus 25 percent of lot area

- DADUs in rear yards next to an alley are not subject to lot coverage so long as they are under 800sq ft (or some other number)

This will help increase how many DADUs can actually be built.

» **Thank you for your comment. The comment is noted.**

Alternative 2 and 3 are good, it will keep houses from being torn down while increasing density

» **Thank you for your comment. The comment is noted.**

I disagree with the impacts of displacement/affordability. Since in smaller lots you're not able to build DADUs that are worthwhile (a studio doesn't count) I'm encouraged to demolish my existing house and make a giant one. The new house will be more expensive and makes house prices rise even more. Not to mention the effects on architecture and the neighborhood character.

With the current alternatives only large lots can have DADUs. Basically anything under 65th st in north seattle will not be able to have DADUs, these are small lots by far. You're going to be pushing DADUs to the outskirts of the city where while there is more space, there is less opportunity. Not everyone want's to have an apartment in their home.

Notice that in most of your examples, you either use a 3000 sq ft lot or a 5000 sq ft lot, nothing in between and nothing with a single-floor house which is fairly common.

» **Thank you for your comment.**

Please relax limits for lots between 4,000 and 5,000 sq ft on lot coverage.

» **Please see Chapter 2, Alternatives, for a description of lot coverage requirements. As established in Seattle Municipal Code 23.44.010, the maximum lot coverage does vary by lot size. For lots under 5,000 square feet, the maximum lot coverage allowed for principal and accessory structures is 1,000 square feet plus 15 percent of lot area. The maximum lot coverage for a lot of any size is not proposed to be changed; adding a DADU to 3,200 square foot lot would require that the main house and any other structures on the lot have not already exceeded the maximum lot coverage allowed.**

Both alternatives have downsides that are unavoidable. I suggest you do two things to mitigate the impacts:

- Provide more relaxed limits for green roofs (like the height limit) or for planting trees (that are then protected for x number of years)

- Entice the ADUs to be near high frequency transit areas with lower limits, again these are in parts of seattle that are old and have lots of small lots. The limits that currently exist will push ADUs to places with less opportunity

» **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes additional height for a broader range of green building strategies. In terms of incentivizing ADUs near frequent transit, the objective of the EIS is to increase the number and variety of housing choices in single-family zones throughout the city, including areas near transit.**

I think something that is missing here is encouraging DADUs with garages underneath, while this increases the height, it won't impact parking spaces as much.

» **Thank you for your comment. The comment is noted.**

Cave, Donn

The approach described in Appendix A does not adequately account for the economic factors associated with the removal of the owner occupancy requirement, in Alternative 2.

If you refer to the previous SEPA appeal decision, see findings of fact item 28 and conclusions item 9, showing that this change exposes a new option for global real estate investment capital, that isn't accounted for in the historical trends that the Appendix A approach relies on for the scale of impact. Whether value analyses are accurate or not, if orders of magnitude more capital is available for only certain outcomes, that seems very likely to affect the results, and no hint of this is to be expected in historical performance, where the owner occupancy requirement has always been in force.

The observation (page 4-13) that lower priced areas may be rising faster in value, spotlights the obvious consequences for this effect, in terms of displacement.

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative, which would eliminate the owner-occupancy requirement, and Section 4.1, Housing and Socioeconomics, which analyzes removal of the owner-occupancy requirement.**

Chapman, Paul (Member of Welcoming Wallingford)

Remove the parking requirements. These requirements increase the cost of creating housing, making it less affordable. They also restrict the number of parcels where housing can be built. Most importantly, given global climate change, our city should encourage less personal car use rather than more is environmentally prudent. Removing the parking requirements

- » **Thank you for your comment. The comment is noted.**

Allow Permits for AADUs entirely within an existing house under Subject to Field Inspection rules, rather than the full permit process. There is very little difference between finishing a basement with a bathroom and wet bar and constructing an AADU. The full permit process adds thousands of dollars to the cost of an AADU because it demands the services of an architect.

Remove the owner occupancy requirement. While I know there are some concerns over the financialization of housing, even more concerning are the restrictions on rental housing that are created by the owner occupancy requirement. We already allow rentals of entire houses, and of apartment buildings. Requiring owner occupancy in perpetuity means that it is impossible for home owners to downsize while maintaining their property as a rental. To placate opposition, reasonable owner-occupancy requirements would be acceptable, such as requiring that a legitimate owner be resident on the property for a year, including after each sale of the property.

- » **Thank you for your comment. The comment is noted.**

Thank you for your hard work on this Draft EIS!

The ADU DEIS demonstrates that there are no significant impacts to policy changes that make it easier for homeowners to build more housing that integrates well with existing neighborhood development. By creating options for homeowners to build additional housing within the stereotypical characteristics of single-family housing helps

1. Create much needed housing to ameliorate the housing affordability crisis,
2. Without creating adverse impacts to the physical characteristics of single-family zones,

3. While reducing the number of houses torn down and replaced with McMansions because the existing structure can now support more value,

4. And providing homeowners options to withstand cost of living increases by using their property to generate additional income.

I prefer Alternative 2, with certain changes:

1. I prefer that you research allowing 2 AADUs plus a DADU as in Alternative 3. Given that we are not changing lot coverage or materially changing the maximum envelope for the main house, this is a non-impactful way to provide additional family-sized housing in our neighborhoods.

2. I prefer you investigate changing the rules for lot coverage to exclude non-permeable decks higher than three feet from counting against the 35% lot coverage limit. This limit currently prevents additional housing without creating any environmental benefits.

3. I prefer you investigate decreasing the costs for building ADUs by:

3a. Permitting AADUs entirely within an existing house under Subject to Field Inspection rules, rather than the full permit process. There is very little difference between finishing a basement with a bathroom and wet bar and constructing an AADU. The full permit process adds thousands of dollars to the cost of an AADU because it demands the services of an architect.

3b. Reducing/eliminating the cost for sewer hookups for DADUs. The \$15,000+ fee to begin sewer service for a tiny house is prohibitive. As an example, the city and county could explore a rebate system on the fees in return for maintaining the DADU with below market rents.

I agree with the DEIS Alternative 2 conclusions that the following won't have adverse impacts. I encourage you to maintain this in the final EIS and ordinance.

1. Removing parking requirements. These requirements increase the cost of creating housing, making it less affordable. They also restrict the number of parcels where housing can be built. Most importantly, given global climate change, our city should encourage less personal car use rather than more is environmentally prudent. Removing the parking requirements

2. Removing the owner occupancy requirement. While I know there are some concerns over the financialization of housing, even more concerning are the restrictions on rental housing that are created by the owner occupancy requirement. We already allow rentals of entire houses, and of apartment buildings. Requiring owner occupancy in perpetuity means that it is impossible for home owners to downsize while maintaining their property as a rental. To placate opposition, reasonable owner-occupancy requirements would be acceptable, such as requiring that a legitimate owner be resident on the property for a year, including after each sale of the property.

3. No MHA requirements. By allowing 2 AADUs within a structure without any MHA requirements, we can incentivize the creation of low-impact family sized housing by existing homeowners.

- » **Please see Chapter 2, Alternatives, for a description of what is included related to reducing costs and the frequent comment response regarding requests for additional changes to the Land Use Code.**

Reduce/eliminate the cost for sewer hookups for DADUs. The \$15,000+ fee to begin sewer service for a tiny house is prohibitive. As an example, the city and county could explore a rebate system on the fees in return for maintaining the DADU with below market rents.

- » **Capacity charges are levied by King County; the City does not have authority to waive those fees. King County has two studies underway that may lead to changes to the capacity charge, including charges for a new ADU. See kingcounty.gov/services/environment/wastewater/**

[capacity-charge/review-studies.aspx](#) for more information. Please also see the frequent comment response regarding King County Sewage Treatment Capacity Charges.

Chiachiere, Frank

I wholeheartedly support Alternative 2. As a homeowner, I want to see more options for people of different incomes in my community and my neighborhood.

» **Thank you for your comment. The comment is noted.**

Childs, Brian

Parking is a huge problem. These structures rarely have or are required to provide parking. The timeline disconnect between public transportation infrastructure and efforts to reduce car ownership make this a real problem. I do not want to see more ADUs in our neighborhood primarily because developers who do not live in the neighborhood are adding more units at a total disregard for the character of those neighborhoods. Existing homeowners bought both a property and a community, and these kinds of units dramatically change the quality of life ... again, because of parking, congestion, and the aesthetic they bring. Please don't allow these units anymore.

» **Thank you for your comment. The comment is noted.**

Chong, Jessica

My husband and I have been renting in Seattle and are about to close on a house. We have a new baby and my mother is planning to move to Seattle to help take care of our baby (and future kids). She cannot afford to buy her own place given Seattle prices, and there aren't rentals near our future home. We would like to build an ADU or DADU on our future property so that she can live with us. We almost put offers on 5 houses that we had to rule out because the houses just barely did not meet the current, restrictive DADU requirements, even though the properties actually had plenty of lot space overall. For example, some of the lots did not have space for a parking space - which should not be a problem because my mother does not drive a car. Also, many lots had a garage that was ripe for adding a second story to support an apartment upstairs while still allowing a parking space for us, but then we would not have enough square footage left for her living space. The current rules forced us to prolong our house search 6 months more than if we had had more flexibility in building a DADU in the future. During those 6 months, average Seattle housing prices increased by >\$200,000!! We'd love to live in a multigenerational setup while still maintaining our desires for privacy and independent living.

The proposed changes that are most important to us are:

Elimination of the parking requirement for ADUs regardless of number

.Elimination of minimum lot size for ADUs.

Increasing the allowed gross floor area

More allowable rear yard coverage.

.Incremental increases in size and height allowances and options for roof features such as dormers and green roofs.

.Do not apply Mandatory Housing Affordability.

» **Thank you for your comment. The comment is noted.**

Christensen, Charles

I like option 3. It seems to balance housing and parking needs well.

» **Thank you for your comment. The comment is noted.**

Christianson, Liane

I support alternative 2 in order to add a Dadu to my home

» **Thank you for your comment. The comment is noted.**

Totally support option 2 and have been waiting for this for a few years now. Thanks for considering it. I hope it passes.

» **Thank you for your comment. The comment is noted.**

Don't see any impact here

» **Thank you for your comment. The comment is noted.**

Having this option will enable me to stay in my house longer as a retired person I will not be able to afford my mortgage without more income and would need to move. I have owned my home since 1986, remodeled it in 2008 and do not want to move.

» **Thank you for your comment. The comment is noted.**

My property is large enough for a another accessory dwelling on the property. It is 1/2 block from bus and a short bus ride to light rail and the Univ of WA

» **Thank you for your comment. The comment is noted.**

Wedgwood is a walking neighborhood and many owners here walk everywhere. Think it would have a very small impact on the neighborhood

» **Thank you for your comment. The comment is noted.**

Am already impacted by people parking here for the bus etc. and I plan on providing parking on the property

» **Thank you for your comment. The comment is noted.**

Chu, Gerry

I support changing Seattle law to make it easier to build ADUs / DADUs. We need to build more housing. Having ADUs will not significantly change neighborhood character, and neither should neighborhood character be viewed as static.

» **Thank you for your comment. The comment is noted.**

Clark, Gina, , Master Builders Association '

When done correctly, ADUs and DADUs can have little to no significant impact on the character or aesthetics of a neighborhood community. Design, land use, and aesthetic guidelines that consider backyard coverage limit, bulk, scale, building height, overhangs, roof lines, architectural features, and

landscaping, to name a few, can help blend and integrate ADUs and DADUs into existing buildings. Under the draft EIS, the City of Seattle has determined that both Alternatives #2 and 3 have no significant impact on aesthetics because of the regulations that are currently or will be in place to keep design features flexible to incentive construction while preserving community character. The Master Builders Supports limiting regulations that hand tie design and over regulate, creating barriers to construction, disincentivizing production, and increasing cost.

» **Thank you for your comment. The comment is noted.**

In a time of rising housing costs and decreasing supply, the Master Builders Association supports the City of Seattle's efforts to increase the number and variety of housing choices available in single-family zones by making it easier for property owners to permit and build ADUs. Alternative #2 would result in the construction of 3,300 units over 10-years with no significant impacts to utilities, schools, or EMS. While overall citywide and regional affordability will remain a concern, the addition of 3,300 units adds to housing supply, reducing pressure in many ways including entry level housing, the "missing middle" and for those wishing to age in place. Alternative #2 also allows for a maximum square foot of 1000 without significant additional regulations, including FAR or off-site parking, keeping footprint and design flexible, design flexible, not impacting FAR calculations on the main home, and not requiring owner occupancy of the ADU or main home. Anything that can be done to reduce regulatory cost on production will help to reduce the cost on renters and owners. This provides incentive to construct, as well as design and building flexibility on the lot to enhance integration of the building into the lot and character of the neighborhood, taking into account height, setbacks, and other surrounding aesthetics. Maintaining regulation that balances environment, smart growth, and a healthy housing supply to reduce cost can be maintained with early, open, and frequent communication with all deeply engaged stakeholders in the home construction process. The Master Builders Association stands ready to work closely with the City of Seattle to work on these tough issues to further reduce regulatory barriers while protecting the environment, community character, increasing housing supply, and reducing cost.

» **Thank you for your comment. The comment is noted.**

Alternative 2 will allow for the construction of 3,300 units and provide additional housing choices with a range of size, location and alternative housing options at price points that do readily exist. Alternative #2 will also result in less tear downs than Alternative #1, and about the same as Alternative #3, preserving existing housing in communities, community character, and hopefully resulting in less gentrification. Construction of ADUs will be broadly scattered throughout the city in neighborhoods of varying socioeconomic differences, each with unique demographics and current and future needs. Some have a need for more student housing, some a need to fill gaps for more senior housing, others a need for more workforce housing. But all have a need for more accessible and attainable housing at price points that are currently difficult to find within (or outside) the city. By building ADUs, the desire is to take the pressure off other types of units to open those markets to other renters and buyers who can afford that product. The Master Builders supports this shift in market pricing without tearing down current units or broadly gentrifying neighborhoods.

» **Thank you for your comment. The comment is noted.**

While 3,300 units over 10 years can and will help increase housing supply and attainability for certain sectors of the population, the units will be spread out over the city, and likely not densely centered in a particular neighborhood or community. It would provide housing for 2,160 more residents over a 10-year period which would be a minor, at best, increase. If ADU or DADU production does happen to center in a particular community or neighborhood, density or production can be offset by limiting the maximum number of people per ADU, and design standards and regulations that remain flexible to maintain community character within the footprint of the project. The Master Builders also supports increased density that is consistent with updates to the city's Comprehensive Plan and HALA's recommendations to provide for and increase the type of accessibility to housing within the city. With limited buildable

land in production within the city limits, it is paramount that the city maximize the current land available within the Urban Growth Area to meet density targets, maximize investment in infrastructure including transit, and create jobs/housing balance that brings equitable investment to all communities while producing housing at all price points in production.

» **Thank you for your comment. The comment is noted.**

Thank you for the opportunity to comment on the Draft EIS.

» **Thank you for your comment. The comment is noted.**

Although the draft EIS determined the addition of ADUs and DADUs would not have a significant impact on off-street parking, it was acknowledged, and the Master Builders agrees, there is the potential for adverse impacts on particular blocks within certain areas as production of ADUs and DADUs commences. While on-site and off-site parking requirements can add a significant and at times costly regulatory burden to developers and builders, it can also be a significant issue for neighborhoods already struggling with challenging off-street parking realities. In addition, incentives for the construction of on-site parking is often necessary to accommodate the reality of the need for some individuals or families to own a car (single-moms who shuttle children, those with inflexible work schedules, those who must work more than one job not within the city, those not within a 1/2 mile of bus service). While the Master Builders does not disagree with the analysis conducted by the City, the reality could be that the parking and transportation debate is not over as ADUs and DADUs are constructed and full community buy-in is needed on a project-by-project basis. The Master Builders urges the City to remain open about the possibility of parking incentives and flexibility in the future as projects are constructed, and neighbors comment about the need for additional parking as ADU and DADU production begins.

» **Thank you for your comment. The comment is noted.**

The City of Seattle has determine no significant impacts the level of service for sewer, water, utilities, schools or EMS. The Master Builders Association would tend to agree the construction of ADUs and DADUs under either Alternative #2 or 3 would be widespread throughout the city and over a 10-year period, resulting in little to no significant impact to these services.

» **Thank you for your comment. The comment is noted.**

Clark, Judy

Parking availability is already a crisis. We have already exceeded the availability of street parking in our neighborhood of Capitol Hill, as well as at our son's house on Beacon Hill, while public transportation does not appear to be keeping up with the demand. I believe that any building, DADU, ADU, apartment or condo should include off street parking.

» **Please see the frequent comment response discussion parking impacts.**

It is time to change the land use code for DADUs and ADUs! For those of us who want to build a new unit, the price of building keeps increasing, while the city prevents the addition of new rental units in a housing crisis by deferring the vote.

The lack of changes in the land use code encourages more illegal units. It is better to have reasonable rules, safe units and more fees for Seattle with a change in the land use code

» **Thank you for your comment. The comment is noted.**

Alternative #2 is best for our neighborhood with the 2 exceptions: There should be a parking requirement of 1 parking space/ unit as in alternative #3, and the owner should be on premises part of the year for

accountability purposes. I found the FAR limit confusing, and the present lot coverage limit is sufficient. Present maximum gross floor area limits are highly restrictive, and the proposed 1000 square foot limit for DADUs, excluding garage and storage areas, is essential.

» **Thank you for your comment. The comment is noted.**

The addition of more AAUs and DADUs would keep more owners in their homes and fewer apartments in the neighborhoods. This land use code change is a win-win for Seattle residents.

» **Thank you for your comment. The comment is noted.**

Collins, Drew

I think that there are flaws in all alternatives, but that the city should choose the policy that allows the greatest number of ADUs to be built and with the least restrictions on owner-occupancy or parking.

» **Thank you for your comment. The comment is noted.**

I would like to be able to afford a house and ADU legislation should help housing affordability. I would gladly live in an ADU.

» **Thank you for your comment. The comment is noted.**

We have a housing crisis.

» **Thank you for your comment. The comment is noted.**

We have a housing crisis.

» **Thank you for your comment. The comment is noted.**

We have a housing crisis. Single family zoning is racist.

» **Thank you for your comment. The comment is noted.**

Ignore parking.

» **Thank you for your comment. The comment is noted.**

Connolley, Melissa

We NEED less parking to keep people out of traffic, we should be limiting parking and forcing our public to utilize community based transit, walking or riding. I support Alternative 2.

» **Thank you for your comment. The comment is noted.**

Alternative 2 meets most of the needs in our city; invites housing and use of public transportation.

» **Thank you for your comment. The comment is noted.**

Neighborhoods are essential to calling a city HOME, to keep the nature of the neighborhoods, ADU's are a good use.

» **Thank you for your comment. The comment is noted.**

We NEED more neighborhood alternatives to take out homes and putting in box style apartments, this ADU's provide for maintaining HOME/NEIGHBORHOOD while increasing housing. Alternative 2 still preferred.

» **Thank you for your comment. The comment is noted.**

Alternative 2 does limit parking needs, this is GOOD, we need to get people out of cars and utilizing public transportation.

» **Thank you for your comment. The comment is noted.**

Still on Alternative 2 - so many older resident could use the added income of renting out an accessory dwelling in order to maintain their home in Seattle.

» **Thank you for your comment. The comment is noted.**

Crosser, Nicholas

If Owner occupancy requirement remains I will be forced to stop offering ADU as an affordable housing option. Owner Occupancy requirement of ADU's is unjust, not required of other rental housing sectors and should stop immediately. This requirement hurts middle class families trying to keep their house.

» **Thank you for your comment. The comment is noted.**

Unfortunate that removal of owner occupancy requirement is only under Alternative 2 and not 3. If Owner Occupancy mandate remains I will have to get rid of my ADU decreasing an affordable housing option. Removal of owner occupancy requirement allows me to keep my house that I worked so hard for if I need to move due to work but ever hope of coming back to the home that I own one day. Keeping the owner occupancy requirement places an undue burden on a middle class family like mine just trying to keep their own house. It makes no sense that currently I have to live on the property of the ADU but I can by all means own several other rental properties in Seattle and not have to live there. Living on the property has not been proven to make for a better landlord. It is not a requirement for landlords to live on the property for other types of rentals and ADU's should be absolutely no different. It is just wrong to continue to force this upon owners trying to increase affordable living options in Seattle and the owner occupancy requirement must cease. Otherwise, I will be forced to either sell my own home or get rid of my ADU which has provided a good option of affordable living.

» **Thank you for your comment. The comment is noted.**

Cruikshank, Bill

More and more people are relying on alternative modes of transportation. Seattle is also the only major city in the US that is seeing an increase in public transportation ridership. Car sharing and bike sharing are become a more seamless part of our city. Alternative 2 allows for more aggressive densification without the need for additional parking. Requiring additional parking isn't necessary and will get in the way of ADUs being built. Alternative 2 will allow people to develop ADUs more effortlessly. Please pursue Alternative 2

» **Thank you for your comment. The comment is noted.**

Alternative 2 will help increase density in areas that are traditionally low density. Too high of a percentage of SFH exist near Seattle's urban zones

» **Thank you for your comment. The comment is noted.**

In many cases it is hard to notice ADUs. They are way more aesthetically pleasing than the huge new SFH developments seen in our neighborhoods. Alternative 2 will reduce the chance a SFH will be torn down.

» **Thank you for your comment. The comment is noted.**

No impact to public services or utilities is predicted. Please pursue Alternative 2 for increased housing supply.

» **Thank you for your comment. The comment is noted.**

Please pursue Alternative 2 for increased overall ADU and lower percentage of tear-downs

» **Thank you for your comment. The comment is noted.**

Please pursue Alternative 2 for the increase in housing supply that will result from additional ADUs. I'm a young adult and stress about my ability to buy a home for the first time. Relaxed ADU laws would help me with alternative living options

» **Thank you for your comment. The comment is noted.**

Culver, Aleksandra

Please support the most flexible options for increasing the number of new Accessory Dwelling Units.

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity through land use planning, and inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allowed by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Darsie, Jean

DADUs in proportion to existing buildings should be the goal. We don't need more McMansions that change the look and feel of a neighborhood.

- » **Thank you for your comment. The comment is noted.**

Yes, do make the Land Use Code changes that would reduce barriers to the creation of ADUs.

- » **Thank you for your comment. The comment is noted.**

Keep the requirement that the property owner live there for some time. We want to avoid creation of AirBnBs which would be counter to the goal of making more affordable housing available to more Seattle residents.

- » **Thank you for your comment. The comment is noted.**

DADUs in proportion to existing buildings should be the goal. We don't need more McMansions that change the look and feel of a neighborhood.

- » **Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes an FAR limit for single-family homes that will reduce the maximum size allowed for new construction.**

Perhaps with a few more people living in my neighborhood, Metro will see fit to restore our service. They left us stranded (I'm a senior citizen) with no bus services because we didn't have enough people riding the bus.

» **Thank you for your comment. The comment is noted.**

Some sidewalks would be helpful but I don't think those are part of this proposal.

» **Thank you for your comment. The comment is noted.**

Davis, Cody

I find it ridiculous that you will allow essentially 3 units with 8 people on a lot size so small.

» **To clarify, current regulations allow any number of related people or up to eight unrelated people to live on a lot in a single-family zone, including occupants of an AADU or DADU. The Draft EIS studied the option of increasing this to a total of 12 people on the entire lot.**

I do not want my single family neighborhood re zoned.

» **Thank you for your comment. The comment is noted.**

Do not upzone our single family neighborhoods.

» **Thank you for your comment. The comment is noted.**

I love the current aesthetic of the single family home neighborhoods. It is what makes Seattle unique. Ballard is aesthetically unpleasant because of all the young homes. Any up zoning will ruin the neighborhood.

» **Thank you for your comment. The comment is noted.**

Schools, busses, roads and other forms of public transportation are already crowded. Our infrastructure cannot support any upzoning.

» **Thank you for your comment. The comment is noted.**

This is a terrible idea. This would have several negative impacts on the quality of life me and my neighbor's enjoy. Regardless of what you believe, contractors will buy the property, not give a shit about quality or the people around them and they will ruin our single family home neighborhoods.

» **Thank you for your comment. The comment is noted.**

Allowing zero parking spaces for 8 people is an absolute joke. Probably the dumbest portion of this whole proposal. Classic Seattle government engineering congestion.

» **Thank you for your comment. The comment is noted.**

DeLucas, Karen

I am writing in support of the findings of the ADU Draft EIS (DEIS) published May 10, 2018. I particularly want to praise the city for the historical context that was written in Chapter 3. In order to move forward, we need to learn from our past wrongs so we do not repeat them or perpetuate them in the future. So thank you for including this here.

While I support the elimination of the owner occupancy requirement, I would recommend more in-depth study of the effects this may have. It appears to be the most contested amendment and a stronger case may need to be documented.

I am curious, too, at whether it is possible to study the effects of inaction. "Seattle 7th most costly place to build worldwide", <http://www.djc.com/news/co/12111485.html> Homeowners will still have a financial challenge to build these units. The longer this process is drawn out, the more expensive it will be. House sale prices are of course a part of this, too.

What is the environmental impact of our large population of homeless we are seeing on our streets and setting up camps in available open space. Not that ADUs will be the magic solution, but it is one tool in the toolbox for increasing housing options and spreading out the impact of growth throughout our city.

To be clear, I fully support all the options listed in Alternate 2. I have concerns about the MHA requirements in Alternate 3. If the goal is to build more, adding to the cost burden is not the way to do it.

An added FAR suggested in Alternate 3, needs further study and bonuses could be used to incentivize ADU construction. I would encourage the flexibility of the location of ADUs and DADUs on various sites. The way it is currently written it would encourage basement ADUs which have their own cost challenges and aesthetic issues. Many basements are not easily accessed and therefore are more challenging for elders and people with disabilities. In my own home, I designed a street facing, ground level ADU, that also has a direct access to the main house for when my parents are with us, but also can be locked when there are renters. The main house is located more towards the back of the property.

I have neighbors who live in a big box 3300 SF house that I know wasn't designed for the 3 generations that are living in it. All 4 bedrooms are on the upper floor. If the builders had had an incentive to design differently, it might have had more flexibility for changing demographics. While I like the idea of FAR and FAR bonus' for ADUs, I prefer the flexibility of not limiting the location.

Most lots in Seattle come with their own unique challenges. As an architect, I first have to help my clients with understanding all of restraints imposed on each including zoning, building code, costs, and potential site issues. When drafting the new code, I encourage maximum flexibility so that we can design and build more ADUs.

Thank you,

Karen DeLucas

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code and the response regarding the positive impacts of the proposal. Please also see the response to the form letter included in Section 5.5. Finally, please see Section 4.1, Housing and Socioeconomics, and Appendix A for additional discussion of removal of the owner-occupancy requirement.**

Deutsch, Rebecca, 350 Seattle

I support eliminating all off-street parking requirements for ADUs. Eliminating this requirement would make it possible for our backyard space to accommodate an ADU/DADU and would make a difference in our ability to proceed with building an ADU.

Also, I already park on the street, and I acknowledge that the increased density from more ADUs may make on-street parking a little harder. I fully accept that tradeoff in order to prioritize our space for housing people and creating dense, diverse neighborhoods. We can't privilege space for cars over housing for people - housing is a human right, parking is not.

Fundamentally, giving so much free space to cars means that we're building less housing, having fewer sidewalks and bike lanes, and "of course" encouraging the use of fossil fuels that are devastating the climate. It's time to start thinking about how we move people, not cars.

» **Thank you for your comment. The comment is noted.**

I'm writing in support of removing regulatory barriers around ADUs to encourage more affordable, and low-carbon, housing options.

I want Seattle to be affordable, and households living in dense, transit-rich cities typically generate ¼ to ½ the climate-destroying CO2 of those displaced to the suburbs. The EIS needs to cover the impacts to climate change and carbon emissions, and in particular how the no-action alternative 1 continues on our path of displacement and people moving further away, thus increasing longer commutes and carbon-heavy lifestyles.

Neither of the existing "alternatives" maximizes the benefits and flexibility, though Alternative 2 is a good start. In particular, I support a "preferred alternative" proposal that combines elements of Alternative 2 and 3 to maximize flexibility and prioritize policies that *actively encourage* affordable and green ADUs being built.

Further, my partner and I are considering building a ADU (or DADU) in our backyard, with the desire to create more affordable housing in North Capitol Hill and generate supplemental income. But, we have been daunted so far by the requirements and overhead planning/permitting costs. Reducing regulations to allow for more flexible ADU building would help us make this goal happen.

However, all changes I'm advocating for come with the caveat that I'd only support including them if they wouldn't trigger another round of EIS (we can't afford the delay).

» **Thank you for your comment. The comment is noted.**

We need much, much more affordable housing and more dense neighborhoods, to address the interlinked homelessness /housing crisis and the climate crisis. ADUs have the potential to significantly increase housing supply in close-to-city-center neighborhoods, especially adding smaller, more affordable units among larger single family houses in the least dense neighborhoods.

The EIS needs to cover the potentially large benefits to reducing emissions and getting us on track for the city's Climate Action Plan goals from more mixed-mode and denser, affordable housing options within our single-family-neighborhoods. We need ADUs to stop involuntary displacement to the suburbs, where people have much larger carbon footprints. This is an essential part of an analysis of environmental impact. Please cover the climate as part of our essential environment.

» **Please see the frequent comment response concerning the proposal's effects on climate change.**

I support the final "preferred alternative" option incorporating the following changes. However, all changes I'm advocating for come with the caveat that I'd only support including them if they wouldn't trigger another round of EIS (we can't afford the delay).

1) Lessen property line setback requirements for ADUs (or possibly allow it as an incentive for ADUs that agree to make it affordable and/or built green). This would particularly help our situation, giving greater flexibility to site an ADU in our backyard while preserving a few majestic old, evergreen trees. If we could site the ADU a few feet closer to the property line, this would keep the ADU further from the trees' root lines.

2) Remove the owner-occupancy requirement. It discriminates against renters and disincentivizes building ADUs. While we have all intention of staying as owner-occupiers in our main house in the foreseeable future, it has given us pause in considering building an ADU incase our life/job situation

changes in the future. We don't want an ADU to potentially block us from later moving out and renting our main house. Additionally, why shouldn't existing rental houses also be able to add ADUs?

3) Incentivize affordable rentals by eliminating development charges and MHA fees when owners commit to holding them as rentals affordable to people making under 60% AMI for 15 years and/or when homeowners commit to longer-term rentals for at least 10 years (e.g. not AirBnB units). In our case, we would definitely agree to that deal, as we want to increase the affordable housing available in the city, and the lower overhead costs would make it more feasible for us to build an ADU.

4) Streamline permitting as much as possible. With just three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots or green roofs, residents who want to build an ADU have a clear and predictable pathway through permitting.

5) Lower the minimum square footage for lots that can support DADU's and ADU's to 2500. A 2500 sq. ft. lot can easily support a 2-story house with a footprint of 800 sq. ft. and an ADU inside, and also a DADU with a 400 sq. foot footprint. While in our case of a 5000 sqft lot, we would still be able to build an ADU, I support all efforts to encourage more people to build more units.

6) Allow 2 ADUs plus 1 DADU. We should encourage the subdivision of existing large houses, especially for empty-nesters, and we want flexibility for more units. If someone has divorced or their kids have left home and they have space for a DADU and also a large house, it's good for everyone if they can do 2 ADU's as well as the DADU: it creates more affordable units, and allows people to stay in their own homes when circumstances change.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Dimond, Al

I strongly support an increase in housing capacity and options. Alternative 2, with no requirement for expensive/space-consuming/disruptive off-street parking, and removing the owner-occupancy requirement, is a good step in the right direction.

» **Thank you for your comment. The comment is noted.**

Some of the best-looking side streets in Seattle are full of duplexes, triplexes, and small apartment buildings. Unfortunately they're often on the periphery of major highways.

» **Thank you for your comment. The comment is noted.**

This study generally seems to support the idea that more ADU production, especially in more expensive areas, should be a boon for affordability and opportunity.

» **Thank you for your comment. The comment is noted.**

Particularly on the fringes of urban villages I welcome changes to the character of existing development. We have lots of places walkable to frequent transit and practical retail that could add a lot of people, reinforcing these healthy qualities of urban life, with few plausible negative impacts.

» **Thank you for your comment. The comment is noted.**

Since you'll probably get lots of complaints about parking availability, I want to counter that: I don't think parking availability should be a policy objective. On the public streets, car parking is the lowest-priority

use of space. Off-street, any increase to the number of cars is counterproductive, adding to pollution and congestion. "And I vote," as the saying goes... not for the car-coddling candidates!

» **Thank you for your comment. The comment is noted.**

Dodd, Bayley

Please don't increase the required street parking. We need safer streets for cyclists, pedestrians, and buses. We don't need to accommodate for more cars!

» **Thank you for your comment. The comment is noted.**

Please remove all barriers to increase the amount of ADUs!

» **Thank you for your comment. The comment is noted.**

Let's increase density!

» **Thank you for your comment. The comment is noted.**

Please make it possible to increase density. We need more affordable units- apartments, townhomes, fourplexes, etc. I'm a married young professional who dreams of buying a home and even though I make good money with my husband, we couldn't afford a single family home. But we could afford a townhome or a condo. Please create more townhomes!

» **Thank you for your comment. The comment is noted.**

Dodson, Bret

I support Alternative 2. Parking should not be required. Owner's should not be required to live in any unit.

» **Thank you for your comment. The comment is noted.**

I support Alternative 2.

» **Thank you for your comment. The comment is noted.**

We also need to increase the area in the city that is zoned for multi-family housing.

» **Thank you for your comment. The comment is noted.**

I support Alternative 2. More protected bike lanes!

» **Thank you for your comment. The comment is noted.**

Duggan, Phillip

My name is Phillip Duggan.

My household is made up of Phillip and Terra Duggan and regular family and friends as guests and occasional roommates.

I live in District 5 in the Pinehurst Neighborhood.

I want more housing because because it's the only way we can be a welcoming city. I've got mine doesn't mean others shouldn't have theirs. More personally, I want a city where my father doesn't have to move

away in order to retire. He's going to sell his house on Queen Anne but I would like him to stay in the area and even smaller houses in our neighborhood are getting too expensive for him. I would also love for my future kid to be able to live nearby but that also won't be possible unless they pick a narrow range of careers.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allowed by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12 or more.
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.
10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

eliason, michael

My name is Mike Eliason. I am a father, husband of two, social housing advocate and safe streets activist. I live in Fremont, we own a car but rarely use it. We utilize transit and cargo bikes to get around. I want more housing because we have zero security of tenure long term and we are effectively priced out of Seattle because of the nearly city-wide ban on multifamily housing. Removing onerous and moronic restrictions to ADUs and DADUs won't solve our housing crisis but it is a step in the right direction. If a family like ours - union job, middle class, two kids in public school can't afford to live here, what does that say about those who are less fortunate than us? We need to open up neighborhoods to more households - especially ones that have seen declining or relatively flat population growth since the 1970s. We need more housing in the city, more transit-oriented housing regionwide - to address our housing and climate crises.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8. Support raising maximum household size, total number of residents on site to 12 - we could easily support a cooperative of 3-family sized households on a typical 5000 sf lot - and this would allow more low-income and non-market housing in single family zones. The city looked at doing this in the late 70s, but ultimately relented to anti-housing homeowners.

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

With a federal government that is attempting to build walls to close off our country - we don't need cities closing off entire neighborhoods from those who aren't wealthy. Our exclusionary zoning is the byproduct of a segregationist ([link: http://www.sightline.org/2018/05/23/this-is-how-you-slow-walk-into-a-housing-shortage/](http://www.sightline.org/2018/05/23/this-is-how-you-slow-walk-into-a-housing-shortage/)) and before the first zoning ordinance, multifamily housing was legal everywhere in Seattle. Today, it is illegal in nearly 90% of the entire city. It is long time we reversed these classist land use policies and made for a more welcoming, more equitable, more sustainable, and more livable city.

Regards,

Mike Eliason,

Fremont renter, dad, husband.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

remove all parking requirements for ADUs and backyard cottages.

» **Thank you for your comment. The comment is noted.**

Engelson, Andrew

I support eliminating the requirement of off-street parking for ADUs. I have a family of four and we don't own a car. We get by on transit & car sharing, and the city is improving more and more each year in making transit a more viable option for getting around the city. If we're going to have an affordable city,

it needs to be dense and with robust transit system of buses, light rail, bike lanes, walking routes, and car-sharing.

» **Thank you for your comment. The comment is noted.**

I own a lot with a substantial backyard and am considering building an ADU, and Alternative 2 or 3 would make that easier (since my home was built in 1922 and has no off-street parking). Building more ADUs could make it easier for young people like my daughters or retired people to afford to live in Seattle.

» **Thank you for your comment. The comment is noted.**

I support increasing density in the city and changing zoning laws to allow many more apartment buildings to be built to meet demand for housing.

» **Thank you for your comment. The comment is noted.**

I support the plan that would allow for the creation of the most ADUs and DADUs, to I support Alternative 3. I believe the city should go farther reducing parking requirements, and not require parking set aside, even if 2 ADUs or 1 ADU & DADU are built.

» **Thank you for your comment. The comment is noted.**

We're in an affordability crisis in Seattle. I believe the priority should be building housing, not worrying about the fine points of aesthetics.

» **Thank you for your comment. The comment is noted.**

Enns, Lisa

Support alternative 2, no off-street parking requirements

» **Thank you for your comment. The comment is noted.**

Generally, I support Alternative 2, which seems to allow greater densities and fewer restrictions. As half of a dual income, no kids couple, we can't even afford to buy a condo in our desired neighborhood. Partnering with a family who wants to build a ADU or DADU is really the only way we can afford to move out of our tiny one bedroom apartment and gain a small yard if we want to stay in the neighborhood we've lived in for 10 years. Seattle needs to grow and add "missing middle" housing, such as ADU/DADUs, rowhouses, duplexes, and small apartment buildings in SFR neighborhoods. Thank you for attempting to make it easier to add density.

» **Thank you for your comment. The comment is noted.**

Etheredge, Nick

Alternative 2 (the most aggressive change) is great! Removing owner occupancy requirement is crucial to maximizing number of ADU's, and removing parking is also really important. Please pursue this option. We need as many new homes in single family zones as possible to accommodate more middle class families!

» **Thank you for your comment. The comment is noted.**

Evans, Elise

I would like to see improved pedestrian networks, protected bike lanes (specifically, as opposed to other bike infrastructure), and comprehensive public transit routes, hopefully reducing need for parking in urban spaces.

» **Thank you for your comment. The comment is noted.**

I am in support of Alternative 2 or Alternative 3, whichever may allow more than one ADU and the most added numbers of housed people in a space.

» **Thank you for your comment. The comment is noted.**

I think that while aesthetics are worth considering, as buildings in a community where people live would ideally be beautiful, that this is the least of my concern when it comes to pursuing more options for housing in a dense city.

» **Thank you for your comment. The comment is noted.**

There is clearly a disproportionate housing cost burden on people from racial and ethnic minorities. Seattle has a history of housing discrimination policy against racial and ethnic minorities, and revising current policy to allow for ADUs would be a step in the right direction to make all neighborhoods accessible to people who have families that were unable to build equity in a house due to that housing discrimination. The government needs to support policy that minimizes displacement of historically marginalized groups.

» **Thank you for your comment. The comment is noted.**

That was (all of this is) a lot of information to take in for public comment purposes. I appreciate how well-researched this is, but it's hard for me to make concise comments with limited time with all this information!

I think it's important to make sure shorelines are cared for and canopy of trees is maintained in a city, for our health. If ADU's are added that decrease canopy or add to runoff, I hope owners will be responsible for mitigating those effects.

» **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

Ewing & Clark, Inc.,

I am upset to hear the City is thinking that single family areas should become another place to cram in as many people into the City as possible. The City is not thinking about the many people that have lived in this City for years and made Seattle what it is today. More density means less area for the animals that live in the City, less plant life from the development of added structures. More cars, pollution and untreated water runoff. Stop this massive rezoning that will turn us into an overcrowded smog laden City. Thank you.

» **Thank you for your comment. The comment is noted.**

Fessel, Andy

Homeowners should be able to downscale to a DADU lifestyle and comfortably age in place. To deny these older residents (you have to be older with more financial holdings to be able to afford property

in Seattle) the right to park in their homes (have a garage), have a minimum of 1000 SF allowing 2 bedrooms and 2 baths, and to NOT include storage areas (above or below ground) denies them their federally guaranteed right to occupy and use their property to fulfill their lifestyle needs.

» **Thank you for your comment. The comment is noted.**

Home owners should not be selectively required to have on-site parking, while many of their traditional neighbors do not. Regulations must apply evenly to all homeowners, or to none.

» **Thank you for your comment. The comment is noted.**

Cities are not made up of single-family homes. That is the Seattle of yesteryear, when trees were plentiful and jobs were in shipping and transportation. Seattle is now a technology driven city - and as the downtown landscape has changed so must the residential structure and design.

» **Thank you for your comment. The comment is noted.**

Family sizes have dropped dramatically - from the average of 5 or more to a family size to a level closer to 3 or 4. The presence of DADUs will allow for more families and young children who will keep the neighborhoods vibrant, schools fully utilized, and usage of mass transit.

» **Thank you for your comment. The comment is noted.**

Seattle faces the threat of continued developer destruction of the fabric of old neighborhoods and the construction of new square box houses - built for maximum square footage at the least possible cost. DADU's would allow for existing home owners to realize some rental from their property - and thus afford to continue living in the neighborhood.

» **Thank you for your comment. The comment is noted.**

The additional of small additional dwellings to a residential schema can take the pressure off the housing crisis, and avoid more of the "cubbyhole" apartment buildings that are springing up all over lower Queen Anne and the Interbay sector.

» **Thank you for your comment. The comment is noted.**

The future of Seattle depends the presence of strong family relationships and multiple generations. It is in risk of being a place only for the old , who continue to live in the homes they bought years ago - and the wealthy young - who can afford the exceptionally high housing prices. DADU's allow an additional and more affordable housing option for young families and multi-generational housing accommodations.

» **Thank you for your comment. The comment is noted.**

Fessel, Melissa

Owners should not have to live on-site.

» **Thank you for your comment. The comment is noted.**

The DADU size should increase in size to 1000 sq feet - not including the garage.

» **Thank you for your comment. The comment is noted.**

I live in a house in upper Queen Anne with my husband and we are expecting children. I would like to be able to have my parents live in a DADU on our lot, and increasing the size of DADUs to 1000 Sq feet makes this feasible.

» **Thank you for your comment. The comment is noted.**

Larger DADU size would allow for more families to live in family zones at an affordable cost.

» **Thank you for your comment. The comment is noted.**

Required parking space takes away from the green space in the lot.

» **Thank you for your comment. The comment is noted.**

Fields, Shalon

The homeowner that is building the ADU should have to provide 1 off street parking space per unit. If there is not enough land to do that then they should not be allowed to build the ADU.

» **Thank you for your comment. The comment is noted.**

I agree we should allow ADUs, however, additional parking should be made mandatory for Alternative 2 as it is in Alternative 3. I support Alternative 2 with additional parking made mandatory.

» **Thank you for your comment. The comment is noted.**

Fies, Michael

The no change alternative is the only realistic way to preserve the parking availability current now, which is under stress anyway.

» **Thank you for your comment. The comment is noted.**

Imagine your next door neighbor's building becomes a high-density zoned structure that blocks your views and the sun-light which you have always had and enjoyed. Imagine the destruction to your enjoyment of your property and that of all the others in your neighborhood. Once gone, the character of the street and your housing is forever gone, replaced by more noise, crowding, and stress.

» **Thank you for your comment. The comment is noted.**

It seems like the real-estate economics cited for single-family zones, in which higher density building is encouraged, is certainly beneficial for the construction industry and builders especially. I am opposed to higher-density zoning. I have seen New Jersey up close do not wish to see the same thing happen here.

» **Thank you for your comment. The comment is noted.**

I think the No Action Alternative is the preferable choice. Streets are already full of cars, further crowding is undesirable, resulting in serious degradation of quality of life. Building density increases without concomitant parking spaces for residents of the new buildings has already caused unsurprising problems of cars jamming residential streets at night.

» **Thank you for your comment. The comment is noted.**

The ADU and DADU proposals might benefit builders, but property owners will in the main be disadvantaged. And not just for a short term. I am opposed to the city-plan of such ghettoization.

» **Thank you for your comment. The comment is noted.**

The impacts of the proposed changes were presented as single impacts, and not apparently judged in their totality. But the impacts would be city-wide and negative for all the residents. And they would be negative for just about all residents.

» **Please see the frequent comment response regarding individual neighborhood review.**

Utilities services in my neighborhood were improved in the last few years after failing to provide reliable electricity. We used to experience black-outs more often than one would expect in a modern city. But that is we hope a thing of the past. Having to provide for higher density demands suddenly can only be regarded with a skeptical eye, given the circumstances.

» **Thank you for your comment. The comment is noted.**

Street parking in many parts of town is difficult, sometimes not available during the daytime at all. No change has these problems now. Imagine what the other alternatives will do to compound it into no-solution misery.

» **Please see the frequent comment response concerning impacts to parking.**

Electrical power where I live was dicey until an upgrade was installed a few years ago. Intensifying a great power need with increased population density does not bode well for reliable service. No change does not assure reliability, but the other alternatives will put more demands on a system that to me would become questionable as to reliability.

» **Thank you for your comment. The comment is noted.**

No change is preferable for reasons cited above.

» **Thank you for your comment. The comment is noted.**

No change is preferable to degrading real-estate economics for existing home owners with the other alternatives. Degradation by creating high density conditions would be permanent. It is really a grotesque concept.

» **Thank you for your comment. The comment is noted.**

No change is preferable. The increase of population density proposed in the alternatives will degrade existing living conditions and create unsolvable parking problems. To create deliberately unsolvable problems is not good for Seattle; why do it? It would be dereliction of duty to proceed with such harm.

» **Thank you for your comment. The comment is noted.**

Why create ugliness where beauty resides? No change is preferable to having continuing crowding, unmanageable parking problems, loss of privacy, and all the problems of noise that come with high density.

» **Thank you for your comment. The comment is noted.**

Instead of the City Council imposing top-down regulations, I think that such weighty matters should be put to a vote so all citizens of Seattle can judge for themselves. Few matters could have more consequence for us than these unwelcome high-density proposals.

» **Thank you for your comment. The comment is noted.**

Fitzgerald, Jac

Choose Alternative 2, but don't bother specifying "1 AADU and 1 DADU", just say "2 ADUs"

» **Thank you for your comment. The comment is noted.**

I'm a homeowner in Capitol Hill, with 2 adults in a 1200sqft condo. I believe that we need to build more housing, and make the city a more dense, transit-oriented place in order to maintain any form of social equality and enable people to live in the city of Seattle without a job as a programmer. I believe that loosening ADU restrictions are a good first step towards a more reasonable city zoning policy to encourage this outcome. I also support the advocacy of various groups that have been helping push for increased density around Seattle.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Why doesn't this chapter address the existence of multi-family dwellings in single-family zoned areas, from back when zoning was more reasonable?

- » **Please see Chapter 3, History and Planning Context, for a discussion of the history of zoning in the study area.**

Flannery, Eliot

(1) If Seattle isn't willing to rezone large amounts of single family zoned lots the city's housing affordability crisis will only get worse. Limits on number of unrelated people living in a single family zoned lot serves no purpose other than to make housing more expensive. (2) Parking requirements are downright offensive in a city with thousands of homeless citizens. We need to build more homes for people not for cars!

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see Chapter 2, Alternatives, for a discussion of the Preferred Alternative that removes the off-street parking requirement for ADUs.**

Seattle residents do not have any fundamental or even legislated right to own a car. An automobile is a privilege. Seattle should charge much higher fees for residential parking zone permits and use the money to build affordable housing accessible by mass transit. Low income residents already receive discounts for RPZ permits. High income residents should pay more for RPZ permits to subsidize housing for the low income residents.

- » **The proposal evaluated in the EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to the Restricted Parking Zone (RPZ) program are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

Thousands of homeless citizens forced to camp on the street will affect single family zoned lots' aesthetics vastly more than any ADUs will. Serious compromise is required to address the housing affordability crisis. The time and money spent on this aesthetics study was a waste of resources done to appease NIMBY voters who were never going to be satisfied with the conclusions of the report in the first place.

- » **Thank you for your comment. The comment is noted.**

Fleming, Andrew

Please support the most flexible options for increasing the number of new Accessory Dwelling Units.

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity through land use planning, and inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Fletcher, Kathryn

I support getting rid of the offstreet parking requirement. I live in the CD and we have room for at least 2-3 cars per house and most of us have one or no cars and have plenty of space on the street.

- » **Thank you for your comment. The comment is noted.**

I have been following this issue for several years waiting for loosening regulations. The things that have been prohibitive for us building DADU are off- street parking regulations, owner occupancy (though we would be living in house foreseeable future but wonder about future sale issues), and general costs of development. I like the idea of some streamline design options and reduced sewer hook up fees along with reduced development fees for those who will rent at reduced rate. There is no time to waste as this process has gone on a long time already.

- » **Thank you for your comment. The comment is noted.**

Fliss, Tim

Single family zones in Seattle have more than enough parking. In a city with an affordability crisis, this should be the least concern. Transit and biking improvements are the right way to address people's need to get around. Alternative 2 is correct in eliminating parking requirements.

- » **Thank you for your comment. The comment is noted.**

Flexibility in entrance locations helps keep design simple.

The elimination of the parking requirement is a major cost saving.

- » **Thank you for your comment. The comment is noted.**

Backyard cottages look great and fit in just fine. They will also allow people to have more choice in living in the size of house they want to.

- » **Thank you for your comment. The comment is noted.**

Overall alternative 2 is preferable because it lowers barriers to getting ADUs built. It provides needed flexibility in Seattle's widespread single family zones.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is less likely to encourage tear-downs than alternative 3. It will be more helpful in allowing families to remain in their neighborhoods by extending their houses (i.e. for aging parents) rather than

needing to move. Alternative 2 will help providing affordable housing options in the widespread single family housing zones in Seattle. Seattle's single family housing zones have contributed to our current housing crisis, wealth inequality and transportation difficulties. This is a change for the better.

» **Thank you for your comment. The comment is noted.**

ADU's are an incremental change if anything, and hardly differ from the impacts of tearing down small old single family houses to build giant new single-family houses. Alternative 2 is the best way to relieve some of that pressure.

» **Thank you for your comment. The comment is noted.**

Seattle easily has the capacity to absorb these changes. In fact many of the single family zones have remained constant in population or dropped slightly in recent decades.

» **Thank you for your comment. The comment is noted.**

Follis-Goodkind, Maxx

Alternative 3 seems like the best action to me, HOWEVER - I don't understand why the requirement for the owner to occupy the residence is applied to Alternative 3 and not to Alternative 2. I think this would result in many owners not adding ADU/DADU and instead just selling properties instead of renting them. It feels like that was added just to make Alternative 3 unrealistic/unhelpful to solving the housing needs problem.

» **Thank you for your comment. The comment is noted.**

Foltz, Mark A., Welcoming Wallingford

Mark A. Foltz

Welcoming Wallingford

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Seattle, WA 91803

markafoltz@alum.mit.edu

June 24, 2018

Councilmember O'Brien, Ms. Pennucci,

I am writing to provide comments on the Council's Draft Environmental Impact Statement for backyard cottages and granny flats ("ADUs").

First, I want to thank the Council staff for preparing a comprehensive and thorough EIS that studies the history of single family zoning in Seattle, and in particular draws several important conclusions that set context:

Seattle's single family zoned areas have failed to absorb an equitable amount of the city's growth. In fact, single family zoned areas have lost population since 1970, when single family areas were downzoned and new housing was banned.

Single family zoned areas have generally become wealthier and whiter over time. Banning new housing in over 60% of the city's area have exacerbated Seattle's historical segregation by race and class.

Adding housing to single family zoned areas through ADUs will not lead to significant displacement of low income renters by tearing down rental properties. Nearly all of the single family homes on the rental market are already out of reach to low income renters.

On the contrary, homeowners who add a revenue stream to an existing property by building an ADU will be able to stay in their homes, helping with living expenses and sharply increasing property taxes.

My comments consider some of the 14 elements of the two action alternatives and recommends which aspects be included or amended in the Final EIS Preferred Alternative.

Welcoming Wallingford looks forward to working with the City to shape legislation based on this EIS that will increase affordable housing options across the city, which are desperately needed now more than ever.

Yours,

Mark A. Foltz

Welcoming Wallingford

Welcoming Wallingford are Wallingford residents and friends who welcome more neighbors and say "YES! in our backyard." Our vision is a more equitable, sustainable, and inclusive Wallingford and Seattle.

CC: Seattle City Council members, Susie Levy

Number of ADUs allowed on lots in single-family zones

The entire point of this exercise is to legalize and encourage the development of new housing in single-family zones, where it is now illegal; the past attempt to do so in 2010 has failed. In this light, a modified Alternative 3 - that allows two AADUs or two DADUs per lot - should be included in the Preferred Alternative.

The DEIS shows that two additional units have no adverse impacts, so why not provide maximum flexibility? This would legalize triplex style construction in single family zones. Note that there are many such units already in existence in Wallingford and in other neighborhoods that were historically downzoned from multi-family zoning. Let's look at the single block that I myself live on in Wallingford:

(image copyright Sightline Institute)

Green blocks represent duplexes and yellow blocks represent units that hold 4 or more people (including a quad-plex and a 6-unit apartment building). These have been here for decades and no one has been complaining about them or their "adverse impacts!"

Off-street parking requirements

Please include Alternative 2 in the Preferred Alternative as it removes off-street parking requirements from the construction of new housing. This is consistent with the recent effort by the City to unbundle parking from rent for tenants and to reduce minimum parking requirements throughout the city. Forcing the construction of off-street parking will essentially bundle its costs with that of the ADU, making them more expensive or impossible to build. Moreover, the DEIS shows that Alternative 2 will minimize the impact on tree canopy in single family areas. Some ADUs will have offstreet parking - that is fine - but give homeowners and tenants a choice and don't force people who don't need a car to subsidize the cost of building parking for everyone.

Owner-occupancy requirements

Single family homeowners are free to rent their entire property - even on platforms like AirBNB - with no owner occupancy restriction. Why should the owners of homes with ADUs face additional restrictions? More importantly, adding owner occupancy restrictions will discourage or prohibit the construction of new ADUs on second homes or households with seasonal occupancy, which goes counter to the goals of this process. Finally what happens if a homeowner with an ADU has to relocate on short notice? Kick out their tenants and tear down their ADUs? Please include Alternative 2 in the Preferred Alternative to remove the owner occupancy requirement out of a sense of basic fairness to property owners and future ADU tenants alike. The DEIS shows no adverse impacts for removing the owner occupancy requirements.

Minimum lot size, Gross Floor Area, and Height

In these aspects, the proposals in Alternative 2 will enable more properties to add ADUs. Please incorporate them into the Preferred Alternative. As the City needs to continue to invest in green stormwater infrastructure and also encourage deep green building, an extra two feet of height throughout would permit more efficient and greener construction techniques.

Maximum Household Size

I see no reason to limit households as they are today - common sense dictates increasing the household size in conjunction with the increase in the number of living units per lot. Please include Alternative 2 in the Preferred Alternative and raise the limit to 12 people per lot.

MHA requirements

Out of a sense of fairness to other housing developers, and to continue to build Seattle's base of permanent affordable housing, it makes sense to incorporate MHA in a specific fashion for a second ADU. I recommend customizing the MHA program for ADUs in two ways.

1. Ramp up the MHA fees over time based on the number of permitted second ADUs. The first 250 (or so) second ADUs would be fee-free, the next 250 at 25% fee etc. This will prevent MHA from immediately discouraging the construction of second ADUs at the time the program is rolled out.
2. Allow MHA fees to be prorated for 5 years after the unit is constructed. This will allow the homeowner to use rental income to pay off MHA instead of requiring a large upfront payment on top of construction and permitting costs. Homeowners do not have the same access to capital as real estate investors/ developers and the MHA program should take this into account.

Please consider alternative MHA fee schedules as suggested above in the final EIS.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Note, I will be sending these comments separately by email as the form does not preserve the images or formatting.

- » **Thank you for your comment. The comment is noted.**

Fomon, Josh

Alternatives 2 and 3 are great options to create affordable housing. We should prioritize creating more housing over aesthetics -- especially when it comes to single-family zones. Every neighborhood is already diverse in its aesthetics -- and it always changing to accommodate new housing. Higher buildings and mixed-use buildings add to a neighborhood's character, economy, and sense of community. Seattle should embrace these aesthetics before any arbitrary factor such as tree canopy.

- » **Thank you for your comment. The comment is noted.**

Adding ADUs, DADUs, and backyard cottages is critical for Seattle moving forward on affordable housing and stopping from too many members of our community being pushed out of our city or even onto the streets. Changing our land use code must be done, and a mixture of both Alternatives 2 and 3 are important to getting this enacted properly and effectively --- with as many affordable units as possible.

» **Thank you for your comment. The comment is noted.**

Seattle is an overwhelmingly single-family zoned city. We need to change our understanding of what a single-family zone means, and add smaller ADUs and DADUs, and mix-used housing to drive down the costs of living. Creating affordable housing, market-rate housing, under-market rate housing, and affordable homes needs to be a priority to allow all Seattleites an opportunity to live and work in our great city. Seattle should not simply be a playground for the wealthy.

» **Thank you for your comment. The comment is noted.**

Seattle needs density and Alternatives 2 and 3 alleviate a small burden the Seattle housing affordability crisis faces. We need either of these option, in which we lose a bit of Seattle's tree canopy, but gain accommodations that could be affordable. 28% is a tremendous level of tree canopy for a city to already have -- and there are opportunities to expand it with city- and county-owned properties that aren't zoned for buildings or housing.

Furthermore, Seattle has an over-abundance of single-family homes. Reducing lot sizes, adding additional ADUs and DADUs must be a priority of the city to tackle the housing affordability crisis, property tax crisis, and housing inventory crisis. We must recognize that single-family dwellings aren't a one-size fits all solution and invest in density and anti-displacement measures.

» **Thank you for your comment. The comment is noted.**

The best parts of Alternatives 2 and 3 are strategies that will alleviate the housing crisis, create affordable housing, create density and vibrant communities throughout our city, and ultimately benefit every Seattleite who is able to stay in Seattle.

» **Thank you for your comment. The comment is noted.**

Parking and transportation don't matter if our neighborhoods don't have sidewalks, safe bike lanes, safe roadways, or adequate public transportation in which Seattleites can get around. Alternatives 2 and 3 provide for the density exceptions in which Seattle is already facing a crisis -- and we need make fewer cars a priority. Denser, walkable neighborhoods that are accessible de-prioritize the need for cars and consequently, parking spots.

» **Thank you for your comment. The comment is noted.**

Foxley, Collin

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3.Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4.Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

5.Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6.More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7.Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8.Support raising maximum household size, total number of residents on site to 12.

9.Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10.Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11.Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Foxley, Jennifer

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detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

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11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Francis, Susan

Owners should not be required to live on site. There are many single family homes that are currently being rented in the Queen Anne neighborhood. To require people who have an ADU or DADU to live on site is an unequal application of the law.

» **Thank you for your comment. The comment is noted.**

DADUs should increase in size to 1000 sq. Ft not including the garage

» **Thank you for your comment. The comment is noted.**

Making parking spaces required takes away from yard, and therefore green, space.

» **Thank you for your comment. The comment is noted.**

More density should be allowed in single family zones. It would be good to allow people to be able to live, and therefore afford, smaller units in the single family zones.

» **Thank you for your comment. The comment is noted.**

My residence is in Upper Queen Anne. We want to be able to build a reasonably sized DADU to live in. Our daughter and son in law are going to live in the main house with their family.

» **Thank you for your comment. The comment is noted.**

Frisch, G

An EIS does not need the history of racism in the city. What has that to do with the proposed changes? Seems like a topic that is placed in the EIS for political reasons unless the city is saying the proposed changes will undo the past or solve the socioeconomics involved. If the city believes Single Family Zoning is inherently racist, they should say so in the EIS and defend it.

» **The comment is noted.**

After reading the EIS, I find it totally inadequate to support or defend the proposed changes. Stating "No Significant Impact" due to the proposed changes is totally unsupported by the information contained in the EIS. There are no facts provided or sound study methodologies described that even begin to address the environmental impacts caused by the proposed changes. Increasing the housing density in single family zoned neighborhoods will obviously impact parking, traffic, tree canopies, utilities, etc. Denying it by the authors of the EIS will not change the obvious facts.

There are too many inadequacies in the EIS to address them all in this comment form. An adequate EIS would at least address all of the concerns raised by the hearing examiner that forced this EIS. Each issue should be listed somewhere in the EIS and addressed with facts or sound study methodologies.

Facts and study methodologies need to address the entire city as the proposed changes apply to the entire city. Picking certain neighborhoods/zones of the city to study is inadequate as there is a diversity of neighborhoods/zones in the city. If a neighborhood/zone is picked to study, the EIS needs to defend why that is representative of the entire area being impacted by the proposed changes.

» **Please see the frequent comment response regarding individual neighborhood review.**

Trees. Destroying the character of the city's diverse single family neighborhoods (with the existing tree canopies and small scale) seems like a poor trade-off for few market rate housing units that would be created. It only takes one large ADU placed in a neighborhood to destroy the aesthetics of a block. A

visual representation of this would be easy to provide. The EIS is inadequate in assessing the loss of tree canopy caused by the proposed changes.

- » **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use, and exceptions added to the Preferred Alternative to preserve trees.**

The EIS does not provide an adequate assessment of the impacts of increased density on public services and utilities. Especially in the older neighborhoods.

- » **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

Fucoloro, Thomas

Density allows more people to walk, bike and take transit. Homes for people are more important than homes for cars. Eliminate the parking requirements.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is clearly the best, though I wish it went even further.

- » **Thank you for your comment. The comment is noted.**

Backyard cottages are great for aesthetics.

- » **Thank you for your comment. The comment is noted.**

We need even more density.

- » **Thank you for your comment. The comment is noted.**

We need more homes.

- » **Thank you for your comment. The comment is noted.**

Gagne-Maynard, Will

Again, I feel that Alternative 3 is still the winner here. Despite the possibility of decreasing street parking, the amount of space that we devote to storing people's cars on the public right of way is unfair to those who cannot afford or choose not to have cars.

- » **Thank you for your comment. The comment is noted.**

Alternative 3 is the winner in my mind. It will allow for the creation of additional rental properties or allow families to live together.

- » **Thank you for your comment. The comment is noted.**

I firmly support the implementation of Alternative 3 to reduce the barriers for the creation of ADUs and increase the number of housing units that we have available in our city. I think that this represents an incredibly easy way to add density to our city and the impacts are minimal enough for this to be worth implementing.

- » **Thank you for your comment. The comment is noted.**

I think that the land use impacts are minimal enough to pursue alternative 3.

» **Thank you for your comment. The comment is noted.**

This is of 0 importance to me. We are in a housing crisis and shouldn't be worrying about how this will affect the looks of the area.

» **Thank you for your comment. The comment is noted.**

Gaynor, Robert

Building more housing is important to stop climate change and make more affordable for everyone.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Do not require parking. We need to move beyond everyone owning a car to stop climate change. Instead increase transit frequency, safe streets, and electric bikes.

- » **Thank you for your comment. The comment is noted.**

ADUs and DADUs look great. They add more variety to the residential areas.

- » **Thank you for your comment. The comment is noted.**

Expanding and improving utilities is much cheaper than continuing to increase sprawl and much much cheaper than hot much climate change will cost.

- » **Thank you for your comment. The comment is noted.**

Increasing urban density is required to address climate change.

- » **Thank you for your comment. The comment is noted.**

More housing options will allow more people to afford housing.

- » **Thank you for your comment. The comment is noted.**

Support the options that give the most housing options. (combination of options 2 and 3)

- » **Thank you for your comment. The comment is noted.**

Geenen, Hugh

Please support the most flexible options for increasing the number of new Accessory Dwelling Units.

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity and institutional racism through land use planning as well as inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for

affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

Further study needed on limiting the size of the main house. For the final preferred alternative, we recommend that the city not include the maximum size limit on new houses proposed as part of Alternative 3. The DEIS indicates that the size limit would make teardowns less likely and ADU construction more likely. However, Alternative 3 also includes rules likely to impede ADU production (owner occupancy, parking, MHA). The analysis doesn't isolate the impact of each change, so it's unclear which change is doing what. For the final EIS, the city should conduct further analysis to assess the effect of the house size limit in isolation. A straightforward way to do that would be to apply the size limit to Alternative 2 and rerun the econometric model. If the city opts to include a size limit in the preferred alternative, it should exempt all AADU floor area from the size maximum, whether below grade or not.

Request for additional analysis to test limits. In general the DEIS shows that the action alternatives have substantial "breathing room" for causing any adverse impacts. This suggests that rules could be further relaxed without risk. Most importantly, the city should analyze allowing three ADUs per lot. Analysis could be simplified by assuming an upper-bound of 50 percent increase in ADU production. The city should also analyze a lower minimum lot size for DADUs (2,000 ft²), an allowance for two DADUs, an increase in the maximum size for AADUs (at least 1,500 ft²), and removal of limits on the number of unrelated occupants.

Thank you for the opportunity to provide comments.

Sincerely,

Hugh Geenen

[These comments having been submitted, I would like to add that the rules around land use as well as the requirements of the State of Washington Growth Management Act, like SEPA and the EIS process, are dated and no longer reflect needed environmental oversight. The Legislature needs to revisit these tools in light of the fact that the underlying principles of them are steeped in 20th century thinking before we fully entered our current period of a climate change emergency. The Growth Management Act needs to be updated for the 21st century and opposed to the long history of anti-urbanism, racism and classism that has historically driven land use and zoning in the United States. The proof that this is the case is that these processes are used time and time again *against* the types of initiatives, growth and development that are, in fact, more environmentally sound and more equitable than what is being replaced or substituted or frozen in amber by anti-growth, anti-development, anti-future, anti-change residents.]

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Gibbs, Susan

I believe these dwellings are good for the city. They allow affordable housing and give homeowners a means to generate income Thank You Susan Gibbs

- » **Thank you for your comment. The comment is noted.**

Glenn, Kelly

I support the removal of barriers to ADUs as an effective and economic way to increase the supply of affordable housing. Before we invest millions in subsidized housing, we should give people a chance to create their own and to benefit from it.

» **Thank you for your comment. The comment is noted.**

Goodman, Naomi

Please enact the following changes to the proposed ADU regulation: 1) Remove the parking requirement. The extra car parking space takes away both indoor square footage and garden space. 2) More height for green roofs. Current rules make it hard or impossible to build a comfortable two-story house with a green roof. 3) Don't count a garage as house square footage. If you build a home above a garage, why should the garage space count against the maximum square footage of the house? 4) Allow multiple in-house and detached units. Why can't a property have both a backyard cottage and a basement apartment? Or two in-house apartments and a backyard cottage? We have a housing crisis in the city and these are low impact options to a neighborhood's character while increasing the supply of housing in the city. 5) Get rid of the unrelated occupants limit. 6)

Streamline permitting. 6) Remove the owner-occupancy rule. If someone needs to move from their home for some reason (job, longterm family emergency, financial changes, because they want to, etc), should they have to evict residents and board up their backyard houses? Renters are just as valuable to a neighborhood as homeowners, and the rules shouldn't treat them differently.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Goodwin, Jennifer

Aesthetics will not be significantly impacted by allowing more ADUs, certainly no more so than what is currently allowed.

» **Thank you for your comment. The comment is noted.**

Creating more & smaller housing options via accessory dwellings is beneficial in allowing the aging, the young and the working class to remain in Seattle with housing they can afford vs. leaving the city. The city has approved so few ADUs since they became legal because the applicable regulations make doing so for many impossible.

» **Thank you for your comment. The comment is noted.**

I support option 3 in order to increase options for aging homeowners to age in place, and for their children or other renters to have more affordable options for housing without leaving the city.

» **Thank you for your comment. The comment is noted.**

More housing options will help the working class, the young and the elderly and will contribute to economic diversity.

» **Thank you for your comment. The comment is noted.**

Option 3 will promote the most density in neighborhoods while maintaining single family homes and I support that.

» **Thank you for your comment. The comment is noted.**

Homeowners contributing to available housing by creating ADUs should receive expedited permitting for hooking up utilities to their new construction.

» **Thank you for your comment. The comment is noted.**

Gordon, Jason

Very supportive of Alternative 2 to remove barriers to create more ADUs/DADUs and therefore more housing.

» **Thank you for your comment. The comment is noted.**

Gyncild, Brie

Alternative 2 makes the most sense for a city that is desperate for flexible, affordable housing options. Most important, we should not be requiring off-street parking for ADUs or DADUs, should not require MHA participation (the goal of MHA is to provide affordable housing, which ADUs and DADUs already help with), and should not require owner-occupancy.

» **Thank you for your comment. The comment is noted.**

We should not require off-street parking for ADUs and DADUs, period. We need to increase transit services - especially reliability and frequency - to all parts of the city, and we need to make our neighborhoods walkable and bikeable. But in 2018, we should not be prioritizing space for personal vehicle storage over space for people to live.

» **Thank you for your comment. The comment is noted.**

I am excited about Alternative 2, in particular, and anxious for this process to move forward, making it easier for people to stay in their homes, earn extra income or provide for elderly relatives, and create additional housing in our city. I support the changes recommended by groups such as 350 Seattle, but I urge you not to do anything that would trigger a second DEIS. We must move forward now!

» **Thank you for your comment. The comment is noted.**

Before Seattle had a single family zone, many neighborhoods had a mix of single-family houses, duplexes, triplexes, and small apartment buildings. As the EIS found, ADUs and DADUs would provide a mix of housing options in acceptable density that is compatible with Seattle's 2035 comprehensive plan. Moreover, Alternative 2 would likely decrease the number of existing homes that are demolished and redeveloped, which helps retain the character and history of the neighborhood.

» **Thank you for your comment. The comment is noted.**

Hall, Brady

The proposed "alternative 2" change the the Seattle ADU/DADU rules is needed and necessary for the city to address the current housing crisis. The changes would also allow homeowners in this economic

transition period to generate extra income. It's a win/win. The current rules are outdated and applicable to an older version of Seattle that doesn't exist anymore.

» **Thank you for your comment. The comment is noted.**

Hall, Leanne

2 ADUs should be allowed.

» **Thank you for your comment. The comment is noted.**

Hance, Ginnie

Please adopt Alternative 2 with the following additions: within an Urban Village, the limit should be two ADUs and one or two DADUs depending on lot size.

One concern that came up in the public hearing was the diminishing of the tree canopy when increasing buildings in SF zones. A requirement could be added to plant a new tree if one was removed.

» **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use, and exceptions added to the Preferred Alternative to preserve trees.**

The aesthetic of a DADU or simple ADU on an existing property could not possibly be any worse than some of the amazingly ugly file cabinet/kleenex boxes they are currently putting up all over our SF zones.

» **Thank you for your comment. The comment is noted.**

Purchasing a home with an ADU or DADU becomes more affordable as a renter or a family member can contribute to the mortgage / utility costs. They also help prevent displacement as a home owner is not forced to move as they now have a renter to share in expenses.

» **Thank you for your comment. The comment is noted.**

Current single family houses were built for families - sometimes large families - 8 to 10 or more people. Today these same single family houses have one or two people. Adding an ADU or DADU for one to five people often does not even bring it up to the original occupant capacity.

Also, the current SF zoning lot coverages are usually much larger than the houses on those lots - I know because our family has built two new single family houses after tearing down the old tired originals. Adding one or two ADUs even if the house foot print is increased in most cases would not come close to what would be allowed for new construction. That could be a requirement, depending on the lot size - additions cannot exceed existing SF lot setback restrictions.

» **Thank you for your comment. The comment is noted.**

1. Financing for lower or fixed income home owners should be considered. This could be a good use for some of the MHA funds.

2. Please speed up the permitting process and cost.

3. A catalog of approved DADU city designs a home owner could choose from would help with costs and speed up the process.

4. Simplify the landlord/tenant laws for ADU/DADU owners. The current laws are difficult to navigate and could scare off a lot of folks.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

One area parking should be a concern in my neighborhood would be around the Fauntleroy Ferry Area. They are already swamped with folks parking in the neighborhood catching the ferry. In the same vein, there should be some parking requirements in Urban Villages - but that's another email.

- » **Please see the frequent comment response concerning impacts to parking.**

Again, the increase in capacity of these ADU/DADU SF homes are not any more than large families of a couple decades ago. It seems the public service/utility concern would be far greater in the urban village up zones - going from SF5000 to LR3, RSL, and NC3 or 5.

- » **Thank you for your comment. The comment is noted.**

Harding, Kathy

Among the many differences that are obvious and avoided in the discussion of impacts within this section are the significantly low number of cars parked, the height, scale and bulk of the buildings, the lack of backyards and privacy, and elimination of most of the tree canopy, and of course the "heat island effect" which contributes to the increase in ambient temperature of the environment.

Additionally, the DEIS suggests that there will be no adverse impacts because maximum lot coverage calculations will not change and therefore no additional building area can occur. This is false on several levels:

A. The proposal calls for the reduction in allowable lot size from 4,000 sq ft down to 3,200 sq ft. The current code calls for a maximum lot coverage to be no greater than 35% on any lot above 5,000 sq ft. However, a 3,200 sq ft lot enjoys an exception and allows a lot coverage of 46.25% or 11.25% greater lot coverage than a typical single-family lot.

B. The proposal also changes a current regulation in place to preserve back yards, trees, open space and privacy. The current code limits lot coverage in rear yards to 40%. The proposal changes that to 60% which equates to a significant increase in building opportunities and diminishment of the rights of neighbors protected in the current code.

Beauty matters. Cramming tons of people into overdeveloped single-family lots by building ADUs is not the answer. Replacing silly townhouses that serve no one particularly well--not families with children, not elderly with mobility issues, not single people who want to stay in their homes as their needs change, not everyone's need for green space and privacy--with APARTMENT BUILDINGS is the answer to growth and increasing density!

- » **Please see Section 4.3, Aesthetics, for revised graphics showing cars and additional discussion of the aesthetics analysis methodology in Appendix C. Please also see Chapter 2, Alternatives, for a discussion of the Preferred Alternative, which would allow increased rear lot coverage for a one-story DADU only if its construction does not result in tree removal.**

For all the time and work you seem to put into these drafts, you seem to simply borrow from Portland planners. We are not the same city. Use your imagination and borrow from the dense cities of the east coast, where wonderful neighborhoods were organized around distinct identities. Ruining the beauty,

green canopy, and quiet of single-family neighborhoods in order to create density that benefits mainly property owners, landlords, and developers is short-sighted--and misses the entire point of creating affordable housing. We already know the the city doesn't encourage true affordable housing because the city doesn't require developers to pay fair market rate for affordable units not built and the city doesn't track the minimal fee developers do pay. Why not offer tax breaks or other monetary benefits to homeowners who want to develop mother-in-law apartments within their existing structure (either basement or garages)? Why not guarantee that the city will build parks to make up for the lost green space and places for children, pets, and grown ups to play and gather? Why not reject the out-of-character elevated "luxury" townhouses with rooftop decks -- that kill green canopy, create massive shadows, increase traffic/congestion, and sell for well over 1M dollars, in an absolute cynical slap in the face to cause of affordable housing -- and make developers build smaller, kinder houses with green space and smaller footprint? The people buying those townhouse, typically developers moving in from out of town, will indeed survive. The people of Seattle have enjoyed their smaller homes in single-family neighborhoods for generations.

» **Thank you for your comment. The comment is noted.**

NO ACTION IS BEST.

» **Thank you for your comment. The comment is noted.**

The DEIS does not address or present mitigations concerning the fact that ADU's are by definition not affordable. City witness Matt Hutchens, Architect who designs and builds ADU's and DADU's testified that these units are not affordable as construction costs can average \$250 -\$350 per sq ft to construct and would be rented for at least \$2,000-\$3,500 per month to cover development costs.

Why should the general public subsidize a property owners private investment?

Another very critical issue absent from the DEIS is the recognition that over 50% of these ADU's and DADU's are occupied not by Seattle renters, but by short term tourist and visitor stays through Airbnb, VRBO and others. The city's own survey and witnesses testified that ADU's and DADU's provided rental housing, and housing choices for family members as well. But they also admitted that 50% were being used as portfolio investments as short-term nightly rentals.

Again, why should the general public subsidize a property owners private investment?

The city has done no comprehensive analysis to determine how the ADU alternative options would impact -- increase or decrease -- the supply of affordable housing.

The issues of displacement are not comprehensively studied within the DEIS. As noted above within the Hearing Examiners Decision, the opportunities for displacement are broad and include many unintended consequences proposed in Alternatives 2 and 3. For instance, the City's own expert witness Sam Lai testified that by removing the owner occupancy requirement from the code, there

would most likely be a significant increase in destruction of affordable housing and displacement of communities that rely on those affordable homes, cultural displacement from neighborhoods that have enjoyed security for generations, and gentrification of vulnerable neighborhoods due to anticipated rampant speculation.

The ownership issue was completely overlooked and ignored as a potential environmental impact. The greatest concern among all citizens who provided commentary, testimony, and evidence in the last

few years has been the elimination of the owner occupancy requirement "" again rendering this DEIS inadequate.

- » **As outlined in Section 1.2, Proposal Objective, the objectives of this proposal are to remove regulatory barriers to make it easier for property owners to permit and build ADUs and to increase the number and variety of housing choices in single-family zones.**

The position that eliminating these protections and opening up every neighborhood to multi-family speculation would have no impact is absurd and lacks adequate professional study, any documented unbiased proof and a responsible and comprehensive study within the DEIS. There has been no analysis of the impacts of "scattershot" population density increases under ADU development, versus strategic development in urban centers and villages which focus development proximate to alternative transportation and social services investments.

Under full build-out, there is no analysis of public safety and security and social equity issues of population densities oriented to alleys and backyards, rather than to street sidewalks ("eyes on the street" security issues and social integration and community cohesion). There has been no analysis of fire and life safety issues with regard to fire protection from alleys, which currently the Seattle Fire Department prohibits.

And what are the shade and shadow impacts under full build-out for each alternative?

It is inconceivable to us that the DEIS cannot identify even one adverse impact.

- » **Please see the frequent comment response regarding individual neighborhood review.**
- » **The Full Build-Out scenario was included only in the aesthetics analysis to illustrate a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it here to illustrate the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.**

Your assumption that only 2-3 percent of single family parcels would develop ADUs is extraordinarily low. Indeed, why bother with this code change if that is the only anticipated growth? Therefore your projections for increased parking needs are not credible. You also fail to note that increased cars means not only increased parking needs but increased traffic -- speeding cars down narrow streets where children play, people walk their dogs, and neighbors gather to talk. We have already this seen shift DRAMATICALLY as people hurry to work downtown and to SLU. I have personally witnessed four near fatal collisions of speeding drivers into small children. Outside my house. If this doesn't impact livability, I don't know what does.

- » **Please see the frequent comment response concerning impacts to parking.**

During our appeal hearing, the City admitted that they had not even called Seattle Public Utilities to confirm that single-family neighborhoods could accommodate a doubling or tripling of households. While this was shocking then, this section of the DEIS basically appears to defend that decision by holding that any impacts upon utilities, schools, and other infrastructure has already been considered within the Comprehensive Plan, and therefore no further or much deeper study is necessary. Obviously, you lose credibility with this stance.

- » **Staff from Seattle Public Utilities have been involved in the review of the EIS. Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

Harris, Marlow

Eliminate the parking requirement for MIL's, ADU's and DADU's.

» **Thank you for your comment. The comment is noted.**

I prefer Alternative #3 and believe that homeowners should be encouraged to build MIL apartments, ADU's and DADU's. Many folks can remodel their basements or garages and add living space. But it's important to make the rules simple and not so complicated, so more of these additional units can be simply and cheaply built.

» **Thank you for your comment. The comment is noted.**

By encouraging MIL's and ADU's, this is equivalent to "scatter site housing" and will help bring low-income people into already established neighborhoods.

» **Thank you for your comment. The comment is noted.**

Most MIL and ADU's will not even be noticable, as they will be inside the current building envelope. No design review required!

» **Thank you for your comment. The comment is noted.**

There will not be any additional impact on public services and utility use for most MIL's and ADU's as most of these are small and will only house one or two extra people.

» **Thank you for your comment. The comment is noted.**

Haugerud, Tosten

City streets are a public asset, and access to street parking is not a right of property owners.

» **Thank you for your comment. The comment is noted.**

"Backyard cottages" are by definition not visible from the street. The average lot size in Seattle single-family zones has plenty of space for additional density without blocking views or light to neighboring houses.

» **Thank you for your comment. The comment is noted.**

"incompatible with existing development" is a misnomer. This proposed Land Use Code changes are wise and forward-thinking.

» **Thank you for your comment. The comment is noted.**

I support the proposal to remove regulatory barriers to ADU/DADU construction in Seattle. This is cost- and space-effective method for adding density and (relatively) affordable housing in our city.

» **Thank you for your comment. The comment is noted.**

These are positive outcomes!

» **Thank you for your comment. The comment is noted.**

Finally! 23 members of the QACC wasted 2 years of precious time, only to be re-told "ADUs/DADUs are still a great idea". Keep pushing this forward!

» **Thank you for your comment. The comment is noted.**

Heerwagen, Troy

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity through land use planning, and inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of

available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Herron -- Homeowner, resident

My hope would be for Seattle for Seattle to remove the owner occupancy requirement. Neither Portland nor Vancouver Require owner occupancy in their ADUs. Life is unpredictable and it's impossible to require every owner to have to either sell their house (instead of keeping it as a hard-earned investment) or stay in their house because the city makes them.

- » **Thank you for your comment. The comment is noted.**

Just because people can add ADUs, doesn't mean that every house will become a duplex or triplex.

- » **Thank you for your comment. The comment is noted.**

Hevly, Nancy

This entire proposal is repugnant but the worst element is encouraging profit-seeking developers to take over single family neighborhoods when the city erases the requirement for owner-occupied rental properties. Our prime example is the University Park neighborhood north of the UW campus. Every kind of housing is available there -- boarding houses, accessory units, mother-in-laws, units in garages, basements and attics. All of this works as a desirable neighborhood for, families, students and tenants of all ages, races and incomes because the owner-occupied rule is the wall that repels slumlords and profiteers. It is shocking and dismaying that the city government hopes to hand this city of families (who vote for school and parks levies) over to the Sisleys of this world.

- » **Thank you for your comment. The comment is noted.**

Hickey, Nate

Allowing height limit exceptions for dormers, skylights, and other projections is extremely important.

- » **Thank you for your comment. The comment is noted.**

Please remove all parking requirements and focus on residential parking zones and transit upgrades.

- » **Thank you for your comment. The comment is noted.**

Great work. Don't let the NIMBY's get you down. Seattle needs more creative legislation. One aspect that isn't covered is working with banks to ensure they value the income stream like a commercial property when they value loans, otherwise financing is more difficult.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Alternative 3 is superior if there were no owner occupancy requirement, which is a major hindrance to more units being developed. Alternative 2 is the next best option. We cannot afford to keep the status quo for ADU development when we have such good regional examples in Portland and Vancouver.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 seems slightly better than Alternative 3, but both do a good job of encouraging less tear-down scenarios, which will help retain neighborhood character. High levels of displacement around Greenlake is curious.

- » **Thank you for your comment. The comment is noted.**

Good impact statements that summarize the positive benefits of ADU and DADUs.

- » **Thank you for your comment. The comment is noted.**

Hilde, Jean

I don't think DADUs or backyard cottages will change the aesthetic of a neighborhood. There are many DADUs in place now that no one ever sees or is even aware that they exist.

- » **Thank you for your comment. The comment is noted.**

If the City of Seattle is serious about increasing affordable housing, then adopting new ADU and DADU regulations, preferably Action Alternative #2, is the way to do it!

- » **Thank you for your comment. The comment is noted.**

I prefer Action Alternative #2. Homeowners should not be required to live on the property in order to build an ADU or DADU. This stifles the ability to build and to provide more housing. For instance, we own a property in Seattle that we rent to our children and their friends at low market rates because these young people cannot afford the going rates that Seattle demands. However, we ourselves do not live on that property. With the current regulations, we cannot build an ADU or DADU (which would provide more housing for our young family friends) even though our family members live on the property.

- » **Thank you for your comment. The comment is noted.**

Hill, Gregory

The DEIS provides an limited discussion regarding this important issue. During the 1980's, Seattle was routinely mentioned as one of the most livable cities. The most often cited reason was the ability to own a house relatively close to downtown and a network of neighborhood businesses that made it possible for many shopping trips to be walking trips, and the supply of low cost, older buildings for start up businesses.

The proposed changes to the DADU ordinance (now ADU to confuse the issue) are particularly traumatic as regards the cost of housing. Proponents like to suggest that having a DADU will make it cost less to live in your house. However, no realistic proforma has been provided. What can be said is that we know there is vast wealth in Asia looking for a place to invest. We can see the affects in Vancouver B.C. The proposed elimination of the owner occupancy requirement will convert our city of homes, to investment properties. This will significantly raise the value of homes and the vast wealth will quickly convert our city from one with ownership opportunities to one without. I fail to see the economic impacts of converting the housing in Seattle from family home ownerships to investment opportunities for non-residents from other countries.

I understand that some members of the city council believe this will create thousands of new homes. It is clear that only half of the DADUs built to date are even rented. The notion that we can solve housing cost by selling out city to foreign investors is really not adequately discussed or weighed as befits such an important change.

- » **Please see Section 4.1, Housing and Socioeconomics, for a discussion of housing and socioeconomics, including a pro forma analysis to help understand how the proposed changes might alter the underlying real-estate economics.**

Trees are an important resource in our city. Already people buying on speculation are asking that all trees be cut down as a term of sale. It is easy to see our city being changed to a barren landscape under the current proposal.

This has happened in the commercial and lowrise zones, it should not be allowed to happen in the SF zones.

- » **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use, and exceptions added to the Preferred Alternative to preserve trees.**

The graphics in this document appear to be calculated to hide the impacts of this DADUs as proposed.

- » **Please see Section 4.3 - Aesthetics and Appendix C for information about the methodology used in the aesthetics modeling and analysis.**

Hollowed, Danae

I prefer Alternative 2.

- » **Thank you for your comment. The comment is noted.**

Hornyack, Peter

Please support the most flexible options for increasing the number of new Accessory Dwelling Units. Seattle's long history of codified inequity through land use planning has resulted in an unprecedented shortage of housing, skyrocketing rents and rampant economic displacement. I support reform for ADU and DADU construction because we need to use every tool available to help alleviate Seattle's housing shortage.

The Draft EIS has concluded that the environmental impacts of reducing regulation of ADUs are non-significant. I would like to see the preferred alternative in the final EIS recommend all options that increase ADU flexibility and reduce barriers to the construction of new ADUs. I strongly support all of the recommendations from the Seattle Planning Commission [<https://www.seattle.gov/Documents/Departments/SeattlePlanningCommission/MinutesAndAgendas/FinalSPCADUDEISLetter.pdf>] and urge

that the final EIS incorporate these recommendations. I would like to see the preferred alternative in the final EIS recommend:

- Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize housing, trees and open space over vehicle storage.
- Striking all owner-occupancy restrictions. Owner-occupancy requirements are classist because they are predicated on the idea that renters are inferior neighbors to owners. For that reason alone they should be eliminated, but even worse these requirements would reduce the overall number of accessory units constructed. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement [<https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/EncouragingBackyardCottages/RemovingBarrierstoBackyardCottages.pdf>]. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Eliminating owner occupancy restrictions would allow maximum flexibility for both renters and owners.
- Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allowed by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
- Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key.
- Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
- More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
- Increasing the allowed gross floor area for detached accessory dwelling units to 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
- Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.
- Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.
- Finally, do not apply Mandatory Housing Affordability (MHA) for ADU and DADU construction, and eliminate as many other permitting fees as possible. Any fees will reduce the overall number of accessory units constructed at a time when a severe shortage of housing of all types is the primary contributor to rising rents and economic displacement in our city.

Sincerely,

Peter Hornyack

3806 Evanston Ave N (District 6)

Seattle, WA 98103

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Howard, Oralea

I support Alternative 3.

- » **Thank you for your comment. The comment is noted.**

My only concern is related to permeability. I understand that there is an incentive to have a green roof but I would like to see further discussion of how Seattle will address runoff as our density increases and we see greater amounts of precipitation from the effects of global warming in the years ahead.

- » **Please see Section 4.5, Public Services and Utilities, for discussion of stormwater and Chapter 2, Alternatives, for a discussion of lot coverage.**

Hunter, Collin

I believe it is important to match the look and feel of the original house as well as the neighborhood.

- » **Thank you for your comment. The comment is noted.**

Having two children that are graduating or in college, or parent in-laws that are aging, I have no simple way to provide assistance like I could if permitted to build a back yard cottage, that is a livable space. The financial impact on them is huge. By allowing me to have this as an option it would provide tangible benefits to my family in the short term as well as rental income in the long term.

- » **Thank you for your comment. The comment is noted.**

Current land use is inconsistent at best. You can take a 7000 sq ft lot and split it, while having lot coverage of 80% or more. You should provide a home owner that same ability with a detached dwelling, other wise you benefit the developers but not the homeowners. I agree the dwelling should match the look and feel of the neighborhood.

- » **Thank you for your comment. The comment is noted.**

I support expanding the ability of homeowners to have this as a viable option. Current restricts do not allow a homeowner to capitalize on providing housing to family or renters. We looked into building a detached mother-in-law and could build a 300 sq ft dwelling at a cost of \$200k, the math did not add up. Not to mention who would want to live in a closet.

- » **Thank you for your comment. The comment is noted.**

As Seattle is moving towards enticing folks to not drive cars, the need for off street parking is inconsistent with that goal. I would also say many current houses are not required to have off street

parking so why should you place an additional barrier on folks that want this as an option, when it is not required by a stand along house.

» **Thank you for your comment. The comment is noted.**

Seattle is growing and the density is increasing. This provides an option that helps address the issue.

» **Thank you for your comment. The comment is noted.**

hutchins, matt

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity through land use planning, and inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

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Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

parking is a huge impediment, leads to unnecessary impervious area and often is immediately abandoned, so also money down the drain

- » **Thank you for your comment. The comment is noted.**

concur that slight increases in bulk do not increase environmental impact

- » **Thank you for your comment. The comment is noted.**

Thank you for your excellent work on the options!

- » **Thank you for your comment. The comment is noted.**

Please study the FAR limitation, but with incentives to get back to the SFZ bulk by building accessory dwellings, building green, preserving existing housing

Owner Occupancy restrictions limit many of the potential options over the life of a dwelling and should be stricken outright.

- » **Thank you for your comment. The comment is noted.**

increase height, and rear yard lot coverage. do not apply MHA fees to accessory uses.

- » **Thank you for your comment. The comment is noted.**

streamline permitting by dedicating three reviewers to ADUs--it would make the process much friendlier to neophytes who'd like to build an ADU for themselves

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Please study the FAR limitation, but with incentives to get back to the SFZ bulk by building accessory dwellings, building green, preserving existing housing

Owner Occupancy restrictions limit many of the potential options over the life of a dwelling and should be stricken outright.

- » **Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes an FAR limit. Please see section 4.1, Housing and Socioeconomics for how that impacts the estimated number of ADUs built.**

Jacoby, Kathryn

I am a homeowner in District 6, in Greenwood. I would like to see more density within neighborhoods, including my own. Before I bought, finding an affordable place to rent, with outdoor space (private or shared) where our pets could run around and we were removed from busy, noisy roads, proved difficult. Had there been any ADUs or backyard cottages to choose from, we would have had a better set of options. ADUs are a great alternative to apartments for a peaceful place to live, family friendly, and affordable, with outdoor access. I would like to see the City make them easy and attractive to build and occupy. *I support and echo the recommendations of pro-density/pro-ADU/DADU groups, like Sightline and SeaTech 4 Housing.* If we're being honest, I don't want to live on a busy, trafficky, exhaust-heavy thoroughfare like Aurora or Holman; I'm guessing you don't either. Allowing/encouraging low-impact density to neighborhoods gives people more choice in their housing situations and healthier, safer, happier places to live. Thank you for considering the needs of all Seattleites, including renters.

- » **Thank you for your comment. The comment is noted.**

James, Rochelle

This is what I am most concerned about. Our infrastructure is failing and pushed to its limits. The idea that this City would allow more density without developers carrying the lion's share of the infrastructure repair/update costs is beyond me. We have an aging sewer system and on older lots, they will probably

need to replace old pipes that lead from the property to the main line. Density should not come before infrastructure improvements.

» **Thank you for your comment. The comment is noted.**

No one should ever have to park on a public street every day in front of their home. My street is always full of car to go and adding more permanent cars would be a nightmare. Our streets are already too narrow as it is. In the places where there are no sidewalks, the street will be turned into an unsafe one lane road if people cannot park in their driveway. No new density without dedicated parking.

» **Thank you for your comment. The comment is noted.**

Visually this looks like a shanty town. The loss of privacy and natural light due to increased height is already bad enough. Adding the accessory dwellings affects privacy and noise as well.

» **Thank you for your comment. The comment is noted.**

Increased density is already putting a strain on neighborhood resources including fire, police, healthcare, childcare and other necessity services. Changing the land use also eliminates options for people. Single family neighborhoods offer a sense of community and stability that people desperately need. As a person of color who lives in South Seattle, I know first hand that density is negatively affecting people of color. The City must rectify this by slowing growth in South Seattle. The residents here are less equipped to handle it. Unlike Madison Park, Wallingford, Magnolia, Ballard etc. All of these neighborhoods are already wealthy and can better handle the high prices that density brings. We cannot in the south end.

» **Thank you for your comment. The comment is noted.**

Option 1 is the preferred option - No action should be taken at this time

» **Thank you for your comment. The comment is noted.**

Stop this density nonsense. We have a ton of available housing. Numbers are not the issue. Affordability is the issue. The City needs to get a backbone and require that all of these new apartments have a percentage of units that minimum wage earners can afford. Seattle policies are causing segregation and displacement. If every new building was required to have a percentage at 30% earners and the rest at market rate they would still make money, units would be filled and our communities would be more diverse.

» **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Increasing the number of units has not increased affordability in Seattle whatsoever. However, the lack of planning on the part of the City to mitigate the impacts of our increase in population has had negative effects on current and new residents. The quality of life in Seattle is going down as prices go up and the strain on our roads, utilities and other vital services are stretched.

» **Please see Section 4.1, Housing and Socioeconomics, for a discussion of potential impacts of proposed changes on housing affordability. Please see Section 3.2, Planning Context, for information related to additional strategies the City is considering related to ADU cost and affordability.**

Jensen, Eric

Alternative 2 looks like the best option.

- » **Thank you for your comment. The comment is noted.**

Jensen, Jim

Please support Alternative 2, which provides the greatest flexibility in establishing attached and detached ADUs in our neighborhoods.

- » **Thank you for your comment. The comment is noted.**

I appreciate the opportunity to create up to two ADUs per lot without the owner occupied restriction previously in place, including the option of putting the ADU in the front or side yard as may be viable on any particular lot. I support this flexible approach to creating more density in our single-family neighborhoods.

- » **Thank you for your comment. The comment is noted.**

Jeremy Swirsley

Lots should allow 2 ADUs and an ADU. Remove owner occupancy requirement. Do not limit the size and footprint of ADU.

- » **Thank you for your comment. The comment is noted.**

I would support allowing more ADUs to be constructed.

- » **Thank you for your comment. The comment is noted.**

Please remove all parking requirements.

- » **Thank you for your comment. The comment is noted.**

Seattle seems well prepared for this.

- » **Thank you for your comment. The comment is noted.**

Johnson, Cathy

I support Alternative 2: one in-law apartment and one backyard cottage allowed on the same lot; parking no longer required for ADUs; the homeowner may live elsewhere.

- » **Thank you for your comment. The comment is noted.**

Johnson, Maggi

We have to allow our single-family zones to be used more efficiently and allow them to get a little denser. I think the ADU's and DADU's are compatible with that. One great thing about DADU's is that, unlike in apartment buildings, residents have a little bit of access to private outdoor space for gardening and relaxation. As long as we have requirements that limit lot coverage and, I think, requiring owners to live

on site (to prevent developers from maximizing occupancy in an unthoughtful manner), I think we can continue to have lovely, green, vibrant neighborhoods.

» **Thank you for your comment. The comment is noted.**

As mentioned above, I wonder if it is possible to "tune" the parking requirement to the neighborhood. For instance, in our neighborhood (Lakewood--southeast Seattle) there are generally far fewer cars parked on the neighborhood streets than in, say, Phinney. So maybe our neighborhood is more capable of having units without off-street parking.

» **Thank you for your comment. The comment is noted.**

Generally, I support Alternatives 2 or 3, or some combination of alternatives. I wonder if it is possible to "tune" the parking requirement to the neighborhood. For instance, in our neighborhood (Lakewood--southeast Seattle) there are generally far fewer cars parked on the neighborhood streets than in, say, Phinney. So maybe our neighborhood is more capable of having units without off-street parking. We have a 800 sf backyard building that was built as a work-studio/storage space. We would love to convert it now to a DADU. It would be perfect for someone--snug and comfortable, nice setting. However, it was built to 2002 energy code. Due to the design, it would be prohibitive to insulate it up to today's code to get it permitted. Our main barriers to turning this viable living space into a DADU is the energy code requirement and the off-street parking requirement. However, I do think that owners should be living in the house where there are ADU's and DADU's. I think if people start developing lots completely for rental, that will adversely affect land use and aesthetics.

» **Thank you for your comment. The comment is noted.**

As mentioned above, I did not see any chapters addressing access to parks, trails and other public places (is it included and I missed it?). In a denser City, these types of spaces are critical to maintaining quality of life. The final EIS ought to specifically address the needs for green spaces in a denser City, the load on existing resources, and the expected costs of making sure these resources will be in good shape and meet the needs of the growing population.

» **Please see Section 4.2, Land Use. This section has been updated to include a discussion of parks and open space.**

I prefer options that would result in fewer tear-downs. As I mentioned above, I also think that owners should be living in the house where there are ADU's and DADU's. I think if people start developing lots completely for rental, that will adversely affect land use and aesthetics.

» **Thank you for your comment. The comment is noted.**

I have read studies of all the empty bedrooms in Seattle, due to a number of factors including empty-nesters and foreign investors. With our critical housing shortage, I support changes that make more affordable units available and make better use of our land and housing stock. We absolutely have to provide more housing for people, and this seems like a relatively gentle way of doing it.

» **Thank you for your comment. The comment is noted.**

In a denser City, access to parks, trails and other public places where people can comfortably hang out and recreate is critical. I think this is should be addressed in this chapter.

» **Thank you for your comment. The comment is noted.**

Johnson, Matthew

I support the alternative that provides the maximum number of housing units in the shortest time. WE HAVE A HOUSING CRISIS.

» **Thank you for your comment. The comment is noted.**

WE HAVE A HOUSING CRISIS, NOT A BAD LOOKING BUILDING CRISIS!

» **Thank you for your comment. The comment is noted.**

All SF zoning should be rezoned to LR3.

» **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations to rezone single-family zones is outside the scope of thi EIS.**

WE HAVE A HOUSING CRISIS. ACT LIKE IT!

» **Thank you for your comment. The comment is noted.**

Get rid of all parking minumums. WE HAVE A HOUSING CRISIS.

» **Thank you for your comment. The comment is noted.**

Johnson, Whitney

I'm a long time member of Seattle's Central District (district 3), a neighborhood my family has lived in for over 50 years (experiencing redlining and other racist land use policies & practices). Currently I live with my mother and grandmother (a household of 3). I want more housing and simpler, easier regulations guiding ADU development because I see it as one of the only ways that I and my family will be able to continue to afford to live in this city, and in this neighborhood. The ability to construct an ADU is one of the few ways that I see being able to also maintain inter-generational, as well as mixed-income housing in the city.

I support final EIS recommendations that do not apply Mandatory Housing Affordability rules, since I know of many ADUs that are used for family, or rented well below market -- which is what I will do if I am able to construct an ADU for my family! Adding a fee for their creation for affordable housing would drastically reduce the ability of normal people like me to make their own contribution to more housing that is affordable!

In addition -- I support reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans people who want to build an ADU have a clear and predictable pathway through permitting. Permitting challenges have been a huge and expensive hurdle for my church (Madrona Grace Presbyterian) in trying to build a tiny house and house a homeless person on our property - during which our city declares a homelessness state of emergency! Please align our city policies with our stated investment in, and dedication to, equity and racial justice by allowing people to build affordable housing in simple, straightforward ways!

Lastly, I hope that these recommendations reflect a sense of environmental equity and justice by reflecting how much housing development and displacement has been concentrated in some neighborhoods (like the CD) and not others (e.g. <https://www.seattletimes.com/seattle-news/data/some-seattle-neighborhoods-are-untouched-by-rapid-population-growth-why/>) -- I think ADUs/DADUs

are one avenue to creating both more housing and greater equity as far as development and growth has touched this city.

Thank you!

- » **Thank you for your comment. The comment is noted.**

Jonas, Melissa

We need to make it easier to build all kinds of housing, and we need zoning solutions that make it easier for people to remain in our community. Lowering barriers to building ADUs will help everyone.

- » **Thank you for your comment. The comment is noted.**

Please prioritize race and social equity toolkit results over public comment.

- » **Thank you for your comment. The comment is noted.**

Jude, Roxane

I strongly oppose ADU zone change on single family zones! I live in a mixed zone neighborhood and parking is a nightmare, blocking driveways and mailboxes! We don't even have sidewalks. Out of country buyers snap up Seattle property for profit before a resident hopeful has a chance to bid.

- » **Thank you for your comment. The comment is noted.**

Over crowding is already a problem

- » **Thank you for your comment. The comment is noted.**

Terrible affect on parking and traffic is already bad. Parking a problem in my mixed zone neighborhood

- » **Thank you for your comment. The comment is noted.**

Terrible idea that will only impact quiet neighborhoods and turn them into where I live off Greenwood Ave and Bitterlake! Terrible parking problems with car prowlers regularly.

- » **Thank you for your comment. The comment is noted.**

Justice, Kathy, Johnston Architects

I support Alternative 2, most importantly to remove the owner-occupancy requirement, since it not required of the rental of single-family homes. The rules should be consistent.

- » **Thank you for your comment. The comment is noted.**

The rules for height and the direction that the front door is oriented should be consistent.

- » **Thank you for your comment. The comment is noted.**

Not only do ADUs help non-developers invest in their community using smaller construction budgets, allowing mother-in-law apartments to give older family members a place to age in place or to give young adult kids a place to jump start their lives.

- » **Thank you for your comment. The comment is noted.**

Reducing restrictions on ADUs is the least impactful way to increase density without sacrificing the character of individual neighborhoods. Current Land Use Code promotes tearing down a small single family home and replacing it with a massive single family home.

» **Thank you for your comment. The comment is noted.**

Be swift. Expedite permit processing. Hire more SDCI staff, especially SDOT. Thanks.

» **Thank you for your comment. The comment is noted.**

The rules should be consistent for ADUs, single-family homes, and apartment buildings. Parking exceptions that are available for those housing types need to be available for ADUs.

» **Thank you for your comment. The comment is noted.**

Having greater density is an efficient use of public transit, community services, and utilities.

» **Thank you for your comment. The comment is noted.**

kaminski, robert

Please support the most flexible options for increasing the number of new Accessory Dwelling Units.

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity through land use planning, and inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Kaufman, Pat

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

- » **Thank you for your comment. The comment is noted.**

Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

- » **Thank you for your comment. The comment is noted.**

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

- » **Thank you for your comment. The comment is noted.**

Support raising maximum household size, total number of residents on site to 12

- » **Thank you for your comment. The comment is noted.**

Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

- » **Please see Chapter 2, Alternatives, for a description of what is included related to reducing permitting costs.**

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

- » **Thank you for your comment. The comment is noted.**

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

- » **Thank you for your comment. The comment is noted.**

Keller, Jeremy

I don't believe this analysis addresses some of the benefits of requiring less parking spaces. Less parking means less impervious surfaces which reduces runoff, increases rainwater infiltration, and decrease the urban heat island effect. Other benefits to less parking requirements are decreased construction costs, which lowers housing costs and will lead to more affordability.

- » **Please see the frequent comment response concerning the positive impacts of the proposal.**

In general the study understates the benefits of option 2 to the environment and community from increased density and more housing stocks ability to drive affordability.

- » **Please see the frequent comment response concerning the positive impacts of the proposal.**

My impression is that the owner-occupancy requirements in options 1 and 3 are more onerous than given credit for in the analysis. The owner-occupancy covenant limits a home owners options to address future uncertainty. Personally I have wanted to build an DADU, but we live close enough to the university that we expect we will want to rent the house out in the future. Furthermore the home value would be reduced with a covenant in place limiting the ability to rent it.

- » **Please see Section 4.1, Housing and Socioeconomics, for additional discussion related to the effects of the owner-occupancy requirement on ADU production.**

This chapter doesn't fully address the benefits of increased density to the delivery of public services and utilities. Spreading the fixed infrastructure costs of the utilities over more consumers will decrease cost of service for all residents of the city.

- » **Please see the frequent comment response concerning the positive impacts of the proposal.**

Kelsey, AM

Alternative 2 is preferred as it brings the most units into existing developed areas. Aesthetic impacts will be acceptable.

» **Thank you for your comment. The comment is noted.**

Alternative 2 is preferred.

» **Thank you for your comment. The comment is noted.**

Alternative 2 is preferred. Changes to density and scale will be acceptable.

» **Thank you for your comment. The comment is noted.**

Alternative 2 is preferred. Transportation, and parking impacts will be acceptable.

» **Thank you for your comment. The comment is noted.**

Let's please get going on this! We can't have the sort of housing crisis seen in San Francisco. In-fill is critical. Allow homeowners some flexibility in helping create more housing choices in desirable, close-in neighborhoods. Level the playing field between homeowners and developers and waive the parking requirement.

» **Thank you for your comment. The comment is noted.**

Kennedy, Iola

please do not apply MHA rules to ADU or DADU construction

» **Thank you for your comment. The comment is noted.**

treehouses would allow us to keep more of our canopy in place.

» **Thank you for your comment. The comment is noted.**

visual interest could be greatly improved by encouraging unusual building types.

» **Thank you for your comment. The comment is noted.**

I would like building codes to be modified such that unusual structures such as treehouses can be approved if they meet livability standards.

» **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to the building code are outside the scope of this EIS.**

Kent, Le'a

I support Alternative 2 because it does not maintain the owner-occupancy requirement in perpetuity. I hope that eventual legislation will have a temporary owner-occupancy requirement of 2-5 years--long enough to deter developer use of ADU/DADU as a "single family triplex loophole," but short enough to allow for flexibility for the property owner and to ensure that the housing stock created by additional ADUs and DADUs is not destroyed if the original owner/builder is no longer able to live on the property. The FAR ratio changes in Alternative 3 are interesting because they disincentivize the building of unaffordable, very large houses, but without the ability for the property to eventually go into the hands

of a non-owner-occupant, Alternative 3 does not result in the long-term creation of more affordable housing stock.

» **Thank you for your comment. The comment is noted.**

Alternative 2 does not require permanent owner-occupancy of the property. Alternative 3 does. This Chapter failed to consider long-term marketability of the ADU property and failed to consider whether the affordable, denser housing options created by more ADUs and DADUs will be sustained if the only option when the original owner dies or chooses to sell is to sell to another owner who will owner-occupy. Under Alternative 2, the next owner could either be an owner who lived on the property or an investment purchaser. Under Alternative 3, the only possible sale is to an owner who wishes to live on the property. Indeed, under current code, if the new owner did not want to live on the property or was eventually unable to live on the property, the DADU or ADU would have to be destroyed as a separate dwelling unit. The impact of future destruction of housing units under Alternative 3 is not set forth in the analysis.

» **Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes removing the owner-occupancy requirement.**

Kirk, Christopher

It is impossible and unnecessary to list all of the missing and inadequate aspects of the draft EIS because the scope of the proposed action is so grossly and irrationally broad. The proposed land use changes cover all of the single-family zoned land in the city, and about half total city land area, and therefore the analyses of impacts are unrealistically crude and inappropriate. The EIS lumps together all of the many different types, scales, locations, geographies, economies, and populations of the diverse areas and neighborhoods in the city into a few generic examples for analysis. The EIS must be broken up into separate environmental impact reviews, one for each identifiable sub-area of the city, the same way normal, rational urban planning is conducted. This is not too much to require when considering the potential impacts to so much area and so many people.

» **Please see the frequent comment response regarding individual neighborhood review.**

Kolton, Bryce

Parking requirements are totally unnecessary for any single family housing within a ten minute walk of a frequent bus line. Instead of subsidizing cars and single occupancy vehicles, which make up a small minority of people entering Seattle, let's reinvest money into the bus and bike networks which carry far more people. Do not require parking on the property; with parking spots costing up to hundreds of thousands to build per space, we should not be investing in such a wasteful transportation method in Seattle.

» **Thank you for your comment. The comment is noted.**

It's nice to see that models predict increasing AADU and DADU properties will keep so many local and older houses from being torn down for the new giant houses we see developers creating. It means more families can live in Seattle

» **Thank you for your comment. The comment is noted.**

Large DADUs, so long as they remain somewhat shorter than the original building, do not seem to negatively damage the aesthetics of a neighborhood because they tend to sit behind the existing home.

» **Thank you for your comment. The comment is noted.**

I prefer Alternative 3 for its higher density and more potential units, which will hopefully increase affordability in Seattle. However, requiring off-street parking seems unnecessary for most units, especially those along transit corridors.

- » **Thank you for your comment. The comment is noted.**

If possible, urban villages should be expanded, and general zoning around Seattle should allow denser buildings in single family areas, especially near current and future transit lines.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to urban village boundaries are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

Kranwinkle, Sara

Every house should have 2 parking spaces.

- » **Thank you for your comment. The comment is noted.**

The city's environmental impact study should reflect every neighborhood.

- » **Please see the frequent comment response regarding individual neighborhood review.**

The EIS is too general- it doesn't reflect the different qualities of each neighborhood.

- » **Please see the frequent comment response regarding individual neighborhood review.**

Yes, the visual impact of a lack of trees and large number of boxy structures is depressing, and not the Seattle I was raised in. Please try to vote for something that helps retain the charm of our neighborhoods.

- » **Thank you for your comment. The comment is noted.**

I vote for No Action Alternative (Alternative 1) to the Land Use Code

- » **Thank you for your comment. The comment is noted.**

You can't use a blanket approach with single family homes as they differ depending on the neighborhood. Adding ADU's/DADU's in Magnolia for instance will increase property taxes and not increase affordable homes.

- » **Please see the frequent comment response regarding individual neighborhood review.**

Increasing the height of buildings and their setbacks on Queen Anne Ave N will change the entire feel of the main street. It will lose its charm and neighborhood feeling. If QA Ave is on the list, why isn't Madison Ave in Madison Park on it?

- » **The study area for the EIS includes land zoned single-family outside of existing urban villages and urban village expansion areas studied in the Mandatory Housing Affordability EIS (please see Exhibit 2-1 in Chapter 2 Alternatives for a map of the study area). A duplex is not a permitted use in single-family zones. An existing duplex would be considered a nonconforming use. Adding an ADU to a nonconforming use might be possible but would require review by the Seattle Department of Construction and Inspections to determine that the existing duplex is legally nonconforming.**

Kuever, Karyn

I was unable to read the entire draft, but saw nothing regarding the requirement that the electrical box had to be in a common area to both the dwelling and the ADU. I had what could have been a nice ADU when I lived in Seattle, but the box was in the ADU. We had friends living in it for awhile and they were perfectly OK with us entering their unit in an emergency if we had to access the breaker. They only lived there a short time, but in the 6 years we had the home, we only had to access the box twice. It seems unnecessarily expensive to have to move the electrical box when it is such a rare need and the landlord does have the legal right to enter a tenant's dwelling in an emergency. People who are interested in the lower rent and convenience of ADU's are quite willing to accept an inconvenience or two, and this should not be a barrier. If this were changed, it would remove a financial barrier to lots of people with potential ADU's in accessible basement areas.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to building or electrical codes are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

Kundig, Olson

Parking should not be an issue in SFO zoning. This is a non-issue. I do not think ADUs or DADUs should have ANY required parking.

- » **Thank you for your comment. The comment is noted.**

I support Option 2 and 3, we need as much housing as possible in the city

- » **Thank you for your comment. The comment is noted.**

This is a really great study. Ultimately, I think it proves we need to simply upzone our Single Family zones. I don't think this is a good solution, at all, and the neighborhood would be better off if it simply upzoned to allow for larger development. Some people would hang onto their single family properties and others wouldn't, ultimately, it would provide a variation in scale that makes Capitol Hill so pleasant. This proposal is a band aid, not a solution. That said, since I'm arguing for the most density possible, I'm for Option 3, still.

- » **Thank you for your comment. The comment is noted.**

If, your first goal is: "Community. Developing strong connections between a diverse range of people and places" we should be upzoning all SFO neighborhoods.

- » **Thank you for your comment. The comment is noted.**

LaBenz, Scott

I am in favor of Alternative # 2 for the proposed changes to ADUs / DADUs

- » **Thank you for your comment. The comment is noted.**

Lague, Rich

I support Alternative 2

- » **Thank you for your comment. The comment is noted.**

We desperately need more affordable housing. Increasing the density of our neighborhoods is the best way we can create that housing.

» **Thank you for your comment. The comment is noted.**

Lamb, Jim

The EIS seems to show a huge oversupply of parking in our city. This doesn't even count the tens of thousands of garages that aren't used for cars. If we aren't going to force homeowners to park in their garages, we shouldn't be forcing parking to be included with ADU/DADUs

» **Thank you for your comment. The comment is noted.**

Strong preference for Alternative 2

» **Thank you for your comment. The comment is noted.**

Strong preference for Alternative 2. Owner occupancy will be a headache to police and can easily be gotten around. If the owner isn't required to live in a home that doesn't have an ADU, I don't see why having an ADU should require them to be there. That restriction feels like a made up way to suppress construction.

» **Thank you for your comment. The comment is noted.**

More units and fewer McMansions make this city accessible to more people. Alternative 2.

» **Thank you for your comment. The comment is noted.**

We allow such a variety of styles and sizes for single family residence that the impact to scale for DADUs seems small. The smaller DADU buildings provide a nice contrast to giant homes being built.

» **Thank you for your comment. The comment is noted.**

We should take a regional view here. It's more efficient to have residents living in higher density than to have suburban sprawl. These new residents will also increase tax base in Seattle, which can go towards expanding utility capacity.

» **Thank you for your comment. The comment is noted.**

Langager, Mark

Either 2 or 3 would be good, because of the dire need. This doesn't directly benefit me, because increasing supply reduces home value for my wife and me, potentially. But the need is dire, and it's the right thing to do. It's Seattle's turn to show tech we're serious. When we do "build more" they will "come more", and there's the indirect benefit. Option 2 might avoid some junkiness, but the need can certainly justify Option 3. I hope that supporting one or the other of these two doesn't diminish overall support for allowing these buildings. But forced to choose, I would choose 3.

» **Thank you for your comment. The comment is noted.**

Yes, we will have a greater share of rentals with ADU increases. But rentals are apparently what we as a city lack. I would rather have more rentals and fewer homeless around town.

» **Thank you for your comment. The comment is noted.**

Lara, Myra

Considering both our housing crisis and environmental crisis (sprawl = car dependency = further detriment to our planet), I personally support Alternative 2 with a few caveats. Ideally, duplex/triplex/ garden style apartments are legalized in the entire city, which give amazing flexibility to many household sizes, and would make a lot of Alternative 3 options moot.

Allow more than 1000 sf for family sized units.

Consider FAR limits for single family zones in general (better put, "Residential Zone") in Alternative 2

-OR-

Consider increasing the lot area coverage to 45% when DADU/ADU combo present. That gives a nice possible 1,000sf footprint for both cottage/principal structure for better ground floor accessibility.

No owner occupancy requirement in any alternative. This is a barrier mostly informed by fear and classism without looking into the core of how to dissolve speculation. The majority of Seattlelites are now renters, and many "homeowners" are also "property owners" i.e. own single family homes throughout the city as rental properties.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

Consider either reducing, eliminating or delaying development and permitting costs for low-income people building cottages, but housing in general OR owners/landlords that provide <60%AMI housing costs. We want to encourage these homes.

Find ways to codify smaller lots to encourage diverse ownership.

Allow up to 12 NON-RELATED people in one lot with DADU or ADU present.

- » **Thank you for your comment. The comment is noted.**

Consider renaming "Single Family Zones" as "Residential Zone" to truly transition into a post-climate change, post-fossil fuel world.

Consider reducing the front yard setback to 10' when cottage present (gives both room to breathe/ cultivate green space and trees.)

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

Thank you for tackling this. I'm commenting because I am someone who would love to live in a cottage either on a parcel of land I bought from an owner or a friend. I think the livability of Seattle won't be compromised with the addition of these and more, especially when in today's economy, the "traditional" single family house is not only unaffordable and but also has too much space for the average household. Thank you!

- » **Thank you for your comment. The comment is noted.**

In general, we need better bus and rail services. Remove all parking requirements for DADU/ADU for maximum flexibility.

- » **Thank you for your comment. The comment is noted.**

Laurie Amster-Burton

My name is Laurie Amster-Burton. I live in a rented apartment on Capitol Hill with my husband, teenage daughter, and our cat. I want more housing for personal reasons: we live near three households of close relatives who are also renters. Our rent, and theirs, goes up every year; I'd like us all to be able to continue living in Seattle. More ADUs in Seattle will help to provide more affordable options for families like ours, and ADUs in more neighborhoods around Seattle means more options for places to live, rather than being limited just to the areas that have apartments right now. I also want more housing for everyone in our city. Working in Seattle Public Schools, I encounter many families who have had to move and change schools due to economic eviction, leaving them unable to find affordable housing in the neighborhood of their children's school. I want the city to streamline the ADU permitting process and make it as affordable as possible for property owners to construct new housing. I do not want an owner occupancy requirement. I don't expect to ever buy a home in Seattle; many others are in my position. As renters we are responsible residents who contribute to our communities.

» **Thank you for your comment. The comment is noted.**

The city should not require parking spaces when accessory dwelling units are built. Required parking takes space that could be open space/green space for gardens and trees. It also encourages people to own cars. As a renter who has traveled by transit and not owned a car for nineteen years, I know that not having a parking space in my apartment building has been instrumental in discouraging me from buying a car.

» **Thank you for your comment. The comment is noted.**

Lawton, Marsha

This is a personal issue for me, as I have moved to Seattle to be able to provide care for my grandchild. Given the real estate market in the area, it is a stretch financially to maintain an independent residence. The option of living on the property owned by my daughter and son-in-law would relieve both my own financial pressure, but add to their equity and free up the housing I'm using now for someone else. We would certainly be sensitive to environmental issues and be happy to follow city regulations to allow me to be in a home where we are available to care for each other with such great convenience.

» **Thank you for your comment. The comment is noted.**

Lawton-Crane, Jessie

My name is Jessie Lawton-Crane. I am a mother of one, married in a single-family home. I live in Lake City, and bought my home there because we love the diversity of the residents here. I'm in favor of more housing because, simply put, I want more neighbors! Having rental units available means that my son will grow up surrounded by a wider variety of people, including those who would not be able to afford a single-family home in Seattle. I bought my home assuming that density would increase; I do not want to exclude others from living in my neighborhood.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Lazerwitz, Jay

I support Alt 2, with additional considerations: Elimination of the parking requirement for ADUs regardless of number. Elimination of minimum lot size for ADUs. Striking the owner occupancy restriction. Increasing the size and height allowances.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative would remove the off-street parking requirement and the owner-occupancy requirement.**

Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification.

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes an FAR limit. Please see the analysis in Section 4.1, Housing and Socioeconomics, for a discussion of teardowns and displacement.**

Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence, will make this legislation more effective. Also, not applying the Mandatory Housing Affordability for the 2nd added unit will reduce the development costs for homeowners.

- » **Thank you for your comment. The comment is noted.**

Increasing the size and height allowances will make these structures more useful for the tenants, providing sufficient storage and additional bedroom options. Roofs that include photo-voltaic systems should also qualify for additional height. Also, separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number and size of dwellings that can be constructed.

- » **Thank you for your comment. The comment is noted.**

Having dedicated staff to review ADU/DADUs could reduce the turnaround for permit reviews.

- » **Thank you for your comment. The comment is noted.**

Elimination of the parking requirement for ADUs regardless of number. Providing parking is expensive, often unnecessary as more and more residents do not own cars.

- » **Thank you for your comment. The comment is noted.**

Reducing the sewer hookup charges would greatly reduce the development costs.

- » **Thank you for your comment. The comment is noted.**

Leckrone, Judith

I strongly support Alternative 2. Our city needs affordable housing and as single family homeowner, I welcome and encourage ADUs and backyard cottages in all neighborhoods - including mine which is Seward Park. We need to reduce the barriers and costs of ADUs and Alternative 2 seems to do that best.

- » **Thank you for your comment. The comment is noted.**

Lee, Jacob

Every DADU/AADU I've seen has been all but hidden from street view by the main house. There's no aesthetic impact. If anything, what's aesthetically offensive is the 3k sf giant McMansions going in when we can't build multiple reasonably-sized units on a property.

» **Thank you for your comment. The comment is noted.**

I'm strongly in favor of Alternative 2. That provides the lowest barriers to owners adding more housing to our city, which we desperately need, through the addition of AADUs & DADUs, and removing the owner-resident requirement, which improves the ability to get financing to build those units.

» **Thank you for your comment. The comment is noted.**

Street parking is a privilege, not a right. Street parking should not be considered in any zoning decisions. If a property owner wants parking, they can put it on their own property.

Improved sidewalks, bike transit, and public transit options are important, but I believe they can come behind increased resident density.

» **Thank you for your comment. The comment is noted.**

Alternative 3 is not sufficient, Alternative 2 is a great first step to adding density in the SF lots that make up the majority of the city.

» **Thank you for your comment. The comment is noted.**

I think this research is substantial and good, and that Alternative 2 is a good choice with these in mind.

» **Thank you for your comment. The comment is noted.**

Not sure what is meant by Land Use impacts? It's residential land, being put to residential use.

» **Thank you for your comment. The comment is noted.**

Leed, Roger M.

The ADU proposal was developed without any meaningful effort to elicit neighborhood input and opinions. Neighborhood councils and civic organizations were ignored by the City. This proposal was developed behind closed doors and will produce strongly negative impacts on neighborhoods throughout the City, particularly the lower income areas. Allowing ADU's will attract speculators and get rich quick developers who will see opportunity for profit. They will focus on lower-income neighborhoods with the lowest housing prices. Even if the ADU is built by the homeowner, the effect will be the same: the property will increase in value. The prospective homebuyer who simply wants a family home will have to pay for a home plus an ADU. The City's ideologically motivated program, proclaimed to increase affordable housing, will do just the opposite. The sharp operators will snap up available affordable "starter houses" and the families looking for such homes will lose out. The sharp operators will build to the maximum density to add a rental housing income stream, and then resell to make a profit. The City's intent is easily skirted: developers can live in the house for a short time, then sell and move on. The neighborhood will lose stable long-term residents who will be outbid by developers. The higher value former single-family house, now an income property, will move the neighborhood toward gentrification. Increasing the population in single family neighborhoods will have numerous adverse impacts, depending on area. Can the schools handle the new students? Are there enough parks and libraries to serve the needs of the higher population? Are there sidewalks and safe streets to walk and ride bicycles? Is there adequate healthy food shopping supply within reasonable distance? Is the

transit service adequate to handle the increased demand? Are there enough police and fire resources to handle the larger population? Who is going to pay to meet these needs and where will the money come from? Why hasn't the City fully analyzed these impacts? That analysis requires projecting probable population increases by neighborhood, listing the City and other public services that will be degraded, and the adverse impacts on existing residents, and estimating whether these impacts can be avoided or mitigated. If mitigation is possible, how much will it cost and how long will it take and who will pay for it?

- » **Please see Section 4.1, Housing and Socioeconomics, for a discussion of potential impacts on affordability as well as a discussion of estimated ADU production and number of tear downs by neighborhood profile. In addition, please also see Section 4.4, Parking and Transportation, for a discussion of transportation and Section 4.5, Public Services and Utilities, for a discussion of impacts on public services and utilities.**

This misguided proposal will decrease the supply of affordable single-family housing. It will significantly increase the population of short-term renters in single-family neighborhoods with insufficient City services and improvements, thus adversely affecting the quality of life for all residents. Renters with children will further overcrowd City schools. Many neighborhoods have almost no available on street parking because the streets are narrow and there are numerous curb cuts. Renters with cars will cause parking problems for all residents. Transit service is spotty and not close in many areas. If people can't get to work they can't pay the mortgage or the rent. The EIS ignores or minimizes these impacts because it is trying to justify ADU's instead of doing what the law requires, analyzing impacts objectively.

- » **Please see Chapter 3, History and Planning Context, for a discussion of the City's short-term rental regulations and Section 4.1, Housing and Socioeconomics, for information about how we considered short-term rentals in the analysis. Please also see Section 4.5, Public Services and Utilities, for a discussion of impacts on school capacity.**

ADU's are a gift to property speculators and developers, and will undercut the viability and livability of all Seattle neighborhoods. Seattle's strong single-family neighborhoods are its' most outstanding residential feature, These span the whole range of family incomes and ethnic groups. To harm these in order to serve an ideological objective that has been pushed by policy theorists cheered on by development interests would be a mistake that could never be corrected.

- » **Thank you for your comment. The comment is noted.**

Leibrand, Scott

This analysis comprehensively demonstrates that neither alternative 2 nor 3 would significantly worsen on-street parking availability, and therefore parking and transportation issues should not prevent moving forward with the proposed zoning changes.

- » **Thank you for your comment. The comment is noted.**

Overall, this EIS does an excellent job demonstrating that marginal changes in the direction of allowing additional infill development of Seattle's single-family residential zoned neighborhoods would be almost entirely beneficial, with marginal improvements on housing availability and affordability, and negligible negative impacts on land use, parking, transportation, or public services. I would encourage the city to adopt alternative 2, and then consider further changes to support additional infill development of duplexes, triplexes, and even apartments in denser areas (those near transit, and where significant numbers of multi-unit attached buildings already exist in single-family residential areas).

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

Alternative 2 seems like the most suitable of the proposed alternatives, as it would encourage the most production of much-needed new housing units, improve housing affordability, and maximize flexibility to respond to changes in market conditions.

» **Thank you for your comment. The comment is noted.**

None of the land use changes contemplated here appear problematic in any way. The anticipated land use actions spurred by alternatives 2 and 3, appear to be quite compatible with the nature of Seattle's single-family zones, and in fact would appear to be beneficial in encouraging infill development consistent with current neighborhood character and discouraging tear downs that would place expensive neighborhoods even more out of reach of most Seattle residents.

» **Thank you for your comment. The comment is noted.**

The impacts of both alternatives 2 and 3, but especially alternative 2, are positive overall compared to alternative 1. I appreciate the focus on continued marginal improvements to improve housing supply and affordability.

» **Thank you for your comment. The comment is noted.**

Levine, Al

As a homeowner in the Green Lake Neighborhood I support significant liberalization of the ADU requirements in order to create as many units as possible. If that ends up with three units on every residential lot, great. I lost support the elimination of off street parking requirements in all single family zones. Costco garages and two cars per household are not a sustainable strategy for our city or our planet.

» **Thank you for your comment. The comment is noted.**

Lewis, Adam

I support Alternative 2. I would prefer that there be some requirement that the owner occupy the property for a period after the ADU is built, but no requirement is preferable to a long-term requirement.

» **Thank you for your comment. The comment is noted.**

Lindenbaum, Kathleen and Jeffrey

Alternative 2 and 3 are premature proposals without adequate planning or justification. And as such, are not acceptable proposals by the city - at this time.

» **Thank you for your comment. The comment is noted.**

Alternative #1 should be chosen. In the same way that the "so-called Headtax" came before a thorough explanation of how taxes would be used, there is no compelling reason(s) stated for this proposal. Currently property owners are building ADUs throughout our neighborhood of Queen Anne, and throughout the city in our friends' neighborhoods. In addition, if the proposal cannot produce a "comprehensive impact summary" about neighborhoods (because they're too diverse for such a summary - my reading), this is a super important reason not to act. To approve Alternative 2 or 3 would be a significant lack of responsibility on the part of City governance.

» **Please see the frequent comment response regarding individual neighborhood review.**

There have already been enough studies to support Alternative #1, and a thorough study of future services and utility needs. Current documentation indicates there is no plan in place to meet current needs, let alone future needs that have not been well documented.

- » **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

Linn, Jeffrey

My name is Jeffrey Linn

I live in Wallingford

I have a 12 year-old daughter. I am concerned about her ability to live in Seattle when she grows up.

We need a much wider variety of housing options than is currently allowed in Seattle.

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Loe, Laura, volunteer organizer with MOAR

My name is Laura Loe Bernstein. I'm a U District renter that lives with two roommates in a single house and I live in the basement. I'd love my own kitchen downstairs and have this be an official ADU. I make music and we musicians love basement ADUs! Please make the changes our city needs to have more housing choices for aging in place, intergenerational living.... making it easier and cheaper to build cottages and granny flats are the bare minimum changes we should be making during a housing and climate crisis!

As part of the group MOAR we are recommending the following for the final EIS:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures. This is a way to help folks save money!
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage. Do we have a car storage - crisis vs a people need housing and our climate is changing too fast- crisis?
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings. Don't side with anti-renter neighbors. RENTERS MAKE GREAT NEIGHBORS, TOO!
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots

fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Thanks for taking the time to consider my recommendations!

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

There is enough parking in Seattle compared to most other cities I've lived in. We need to stop prioritizing this in our decision making.

- » **Thank you for your comment. The comment is noted.**

Thanks for this work.

- » **Thank you for your comment. The comment is noted.**

I'm frustrated this is even a consideration in a housing crisis and a climate crisis.

- » **Thank you for your comment. The comment is noted.**

The Sewage Canard shouldn't be a reason to stop people from having housing.

- » **Thank you for your comment. The comment is noted.**

Lui, Henry

I strongly support proposal #2 due to the calculation of 1000sqft excluding garage and storage space. If proposal #2 is not chosen, it will not be feasible to build an ADU unit on my property.

» **Thank you for your comment. The comment is noted.**

Lunden, Zach

I strongly support reducing the restrictions on ADU's and DADU's. I would like to see the requirement for setbacks eliminated. I would also like to see higher FAR's, height limits, and total square footage allowances for ADU's and DADU's. Parking should not be required for any of these, and there should be no limit on short term rentals or requirements for owner occupation of any structures.

» **Thank you for your comment. The comment is noted.**

Lustig, Ankrom Moisan Architects

The historic neighborhoods with the older house will have a complete identity loss at the expense of developers.

» **Please see Section 4.2, Land Use. This chapter has been updated to include a discussion of historic resources.**

Lustig, Kurt

I think that there should be neighborhoods preserved as single family communities as many other cities have done. We have historic homes being torn down everyday for profit, and this will too become a money game. Lofty expectations of creating more housing is not why people will be participating--at the expense of the neighborhood's identity.

» **Please see Section 4.2, Land Use. This chapter has been updated to include a discussion of historic resources.**

I'm not for cramming more houses into less space. QA already has densities that are high.

» **Thank you for your comment. The comment is noted.**

This will be a "for profit" movement--people with lots not big enough to participate will lose value on their homes and have to deal with issues were part of the reason they bought in the neighborhood to begin with (e.g traffic etc)

» **Thank you for your comment. The comment is noted.**

I'm 100% against this and intend to take legal action if needed to protect the integrity of our neighborhood. This will be a lengthy process for the city.

» **Thank you for your comment. The comment is noted.**

This will be a disaster. Parking is becoming harder already at current densities. Traffic has become dangerous on neighborhood streets already due to the increasing populations commuting from the eastside to the waterfront. Please see for yourself during rush hours and mid-day weekends.

» **Thank you for your comment. The comment is noted.**

Our utilities already are antiquated. A full upgrade will be required, paid by the embedded single family tax payer w/o any gains. The developers and new families utilizing the ADU will have the only gains.

- » **Staff from Seattle Public Utilities have been involved in the review of the EIS. Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

Lyles, Lizabeth

I don't care which of the options, I'm fine w/ more ADU's & also apts w/in the home, either/or/both. We need more housing, not rent control or penalizing landlords. BUT, you need to require at least 1 parking spot for the home if there is extra housing. It's probably not as crucial here, but the city is "gave away the farm" not requiring parking in new developments. Another 22 unit went in w/ ZERO parking near here, penalizing existing homeowners. Now the mayor wants to charge tolls since now due to crowded streets (w/ all the tenants who don't have spots now occupying them). Let alone the unused bike lanes. We need more parking, not less!

- » **Thank you for your comment. The comment is noted.**

MacAdam, Matthew

I share the concerns (noted in the EIS) that parking will be an issue in certain neighborhoods. I think the EIS underestimates the potential problems, though--certain neighborhoods are already maxed out on parking, and Metro transit is not doing a good enough job yet that Seattle is really liveable without a car. Metro needs to step up it's game for this to really work. Transit works better with density, so perhaps this will work itself out, but Metro's track record is not great.

- » **Please see the frequent comment response concerning impacts to parking.**

Alternative 2 is better, if no other reason than that the current rules that include garage/utility space in ADU square footage discourage property owners from using the lot coverage from their existing garage for a DADU. Folks don't want to give up their garage. Under alternative 2, property owners can basically just throw an apartment on top of their garage--no increase in lot coverage, no real environmental impacts.

- » **Thank you for your comment. The comment is noted.**

MacArthur, Rob

Accessory dwellings are a necessary step, whatever their impacts might be.

- » **Thank you for your comment. The comment is noted.**

This concern is irrelevant compared to the scale and severity of the housing crisis.

- » **Thank you for your comment. The comment is noted.**

This concern is irrelevant when weighed against the scale of the housing crisis.

- » **Thank you for your comment. The comment is noted.**

Magula, Claire, Bellwether Housing

I cannot wait for the City of Seattle to make building ADUs more accessible and easy. I'm encouraged by cities, such as Portland, that have had huge increases in ADUs built after changing the regulations. Seattle needs every possible unit of housing that can be built here and MUST take every action possible to make it easier to build a diverse range of housing options. I personally would love to live in an ADU and one day hope to even own a home with one. This gives renters and homeowners more choices about affordable places to live. Densify-ing our single family zones in particular is a critical way to help manage population growth that might alleviate some of the burden urban villages have been carrying as the centers of urban density growth. We need to utilize ALL our housing resources and tools and ADUS are a fantastic way to do that.

» **Thank you for your comment. The comment is noted.**

I am in favor of Alternative 2. We should maximize ADU production. We need every unit of housing we can get.

» **Thank you for your comment. The comment is noted.**

I am in favor of Alternative 2. We cannot limit home building because of parking; we need to reduce single-occupancy car driving and continue to expand transit.

» **Thank you for your comment. The comment is noted.**

Mann, Amy

One of the joys of living in the city, in an urban area, is public transportation and NOT having to deal with traffic as the driver of a single- or low-occupancy vehicle. More folks should embrace that. The savings of not owning and garaging and servicing a car are not insignificant and the peace of mind is worth a lot.

» **Thank you for your comment. The comment is noted.**

ADUs will allow more housing without the building density of high rises; a compromise between single-family only (which is not forward-thinking) and high rises everywhere which can be a bit much. Remember when cities developed row houses which provide higher density than single-family neighborhoods???

» **Thank you for your comment. The comment is noted.**

Again, ADUs offer a transition from single family homes to higher density without having to go the route of high rises.

» **Thank you for your comment. The comment is noted.**

Change is something we should all embrace and ADUs offer a tweaking of the single family neighborhood toward row houses and town houses and garden apartments without a drastic upset of the look of the single family neighborhood.

» **Thank you for your comment. The comment is noted.**

The more diversity the better; neighborhoods that become mono-cultures don't build as vibrant a community as diversity; diversity of age, income, ethnicity, etc. are all important parts of a vibrant community.

» **Thank you for your comment. The comment is noted.**

With enough civic will public services and utilities can be adapted to deal with ADUs.

- » **Thank you for your comment. The comment is noted.**

Mar, Sibyl

Alternative 2 is preferred

- » **Thank you for your comment. The comment is noted.**

Marcum, Luke

Adopting Alternative 2 will help increase housing affordability throughout the city. This will help reduce the number of restrictions placed on property owners that could benefit from another rental unit on their property. Homeowners across the city are suffering from increased cost of living every year. With the help of a DADU/AADU's rental income, it helps prevent these homeowners from being priced out of the city.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 would help increase the quantity of smaller rental units in residential areas closer to the city's core. The current code tends to favor properties away from urban cores rather than closer to busier urban centers. The current land use code restricts certain people from having the opportunity to construct a DADU/AADU. By adopting action 2, it gives people with more property restrictions the option to add another unit within their property.

- » **Thank you for your comment. The comment is noted.**

Mark, Jonathan

I agree with the DEIS' conclusions that Alternatives 2 and 3 would not create significant adverse environmental impact.

I appreciate the background information this DEIS provides, showing that Seattle's zoning has become more restrictive since 1923, creating widespread single-family areas which are relatively unaffordable, less accessible to the non-white population, and have failed to absorb any of Seattle's 17% population growth between 1970 and 2010.

Allowing increased ADU's is a small but necessary step and I am grateful for this report's thoughtful analysis.

- » **Thank you for your comment. The comment is noted.**

Marris-Swann, Anthony, City of Renton

Cities are for people, not cars. No new parking.

- » **Thank you for your comment. The comment is noted.**

Aesthetics are important, providing housing is more important

- » **Thank you for your comment. The comment is noted.**

Benefits of increased density outweigh costs

- » **Thank you for your comment. The comment is noted.**

Build housing faster to bring costs down

- » **Thank you for your comment. The comment is noted.**

Yes, make the process as simple as possible

- » **Thank you for your comment. The comment is noted.**

Martinez, Ian

We are in a housing emergency. The City should take action immediately to allow up to two ADUs per lot, without any onerous restrictions, such as parking or occupancy requirements. The City should allow for the maximum proposed number of unrelated people (8) and an unlimited number of related people on lots, while square footage limits should exclude garage and storage areas, which are clearly being used as a "loophole" to prevent development.

Please use this opportunity to take bold action and stem the housing crisis, while moving our city into the new century.

- » **Thank you for your comment. The comment is noted.**

My name is Ian Martinez; my household is made up of myself and my partner. I live in Capitol Hill. I want more housing because right now, the dream of ownership is slipping away from middle class people like me; simply affording rent is slipping away from my blue collar brothers and sisters; lack of housing means more and more people have to sprawl out into surrounding cities, which is bad for congestion, traffic, civic harmony, and the region generally.

- » **Thank you for your comment. The comment is noted.**

While homeowners value aesthetics, the look and feel of a house is not something I believe the city or even neighbors should be able to determine at the expense of a homeowner's autonomy. A neighborhood's character is determined by the people who live there, by the arts and culture created there, by the shops and commerce offered there, not by what the buildings look like. To quote a famous urban planner "if your neighborhood character depends on how the buildings look, you don't have a neighborhood; you have a theme park."

- » **Thank you for your comment. The comment is noted.**

The existing ban on apartments across nearly two thirds of the city produces extremely class-biased outcomes; perpetuating it through a ban on ADUs generally and the owner-occupancy requirement specifically is therefore classist by definition. Renters are shown to make good neighbors and class diversity is proven to benefit neighborhoods.

- » **Thank you for your comment. The comment is noted.**

I strongly urge the city NOT to require any parking. Parking requirements make building new housing incredibly difficult and sustain our city's unhealthy addiction to cars.

- » **Thank you for your comment. The comment is noted.**

McConachie, Anders

I appreciate and support either of the alternatives (2 or 3). However I think greater moves/impacts need to be made. Density is important to Seattle, while also having the freedom to have a single family dwelling. Allowing home-owners to build AADUS/DADUs and also have the option for movable ADUS. Appendix Q needs to be adopted in Seattle(<http://www.ecobuilding.org/code-innovations/policy-profiles/2018-tiny-house-appendix-to-residential-code/tiny-house-appendix-q-as-proposed>) with allowances for movable tiny houses, and alternative eco-friendly options such as compostable toilets and gray water systems. Also residential uses for small parcels of land that are too small to develop. As someone who wants to make Seattle my long-term home, but has no hope of owning a house or condo, DADUs/movable ADUs are my best option.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

I support alternatives 2 and 3. I would also ask that there be allowances made for AADUS/DADUS to use things such as movable tiny houses, composting toilets instead of plumbed toilets, and graywater systems.

- » **Thank you for your comment. The comment is noted.**

DADUs/ADUs would preserve the existing look and feel of many neighborhoods as many of these structures wouldn't be visible by the street while also increasing density. Movable tiny houses should be allowed in order to allow someone to own the tiny home, but move it to various backyards as the host families buy/sell houses. This allows for the tiny house owner to own a house, but still have flexibility within the city if the property is bought/sold by the main homeowner, without the investment of the permanent AADU/DADU.

- » **The proposal evaluated in this EIS focuses on proposed changes to the Land Use Code for the construction of ADUs. Modifying what constitutes a single-family dwelling by removing the requiring that the structure has a permanent foundation is outside the scope of this EIS.**

Many people see established trees as beneficial to property values in single family homes. Another option would be to take smaller land parcels that are too small for development and ensure they have electric and water utility service to allow for smaller dwellings to be developed to also increase density.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to zoning are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

There could be an option where homeowners (empty nesters, retirees) move into an DADU/AADU and rent out the larger main house. This would lower their need for upkeep, supplement a limited income, potentially provide community and support, and avoid displacement or the need to move into a retirement community for longer. Current permitting system is not cost effective/ easy enough for many people to attempt. There is more incentive just to sell.

- » **Under existing regulations, the owner-occupancy requirement allows an owner to live in either the ADU or the main house. If the owner-occupancy requirement was maintained, as described in Alternative 3, an owner could still live in either ADU or the main house.**

McKay, Ali

My name is Ali McKay.

My household is made up of 4 people plus an ADU with 2 more.

I live in District 43.

I want more housing because increasing housing density it is vitally important both for the environment and for equitable and just housing. Obviously, we have a lot of people moving to the city, and the increase in housing prices is directly adding to our homelessness crisis. Adding accessory dwelling units can help people on fixed incomes afford to stay in their homes. I also think that single-family home zoning perpetuates previous racist practices such as red lining and restrictive covenant"~s based on race. We need to undo that, and one way to start doing so is to increase density.

» **Thank you for your comment. The comment is noted.**

McMahan, Kevin

I am writing in strong support of Alternative 2 in the Draft EIS published on May 10. I believe it best leverages current single family zoning to increase density in a manner that maximizes property owners' discretion and respects neighborhood character. We have a very large lot in north Seattle with a very narrow easement to access the rear lot. The flexibility of not requiring owner occupancy offers a great incentive for development and use of such units for owners. Removing the requirement for off-street parking would also fit our neighborhood since running a driveway through a narrow easement to a large back lot such as we have on our property might be unnecessarily disturbing to renters of the current house and neighbors to the south. It is also possible that renters be Metro commuters since express buses to the UW are in easy walking/biking distance from our property.

» **Thank you for your comment. The comment is noted.**

mcmillen, sam

I've been exploring the option of building a dadu but the current restrictions are making it too costly to make financial sense. Please increase the square footage to 1000' increase the rear yard coverage to 60% and remove the owner occupancy requirement. and I will build a dadu asap and help out with the housing issues seattle is facing.

» **Thank you for your comment. The comment is noted.**

I've been exploring the option of building a dadu but the current restrictions are making it too costly to make financial sense. Please increase the square footage to 1000' increase the rear yard coverage to 60% and remove the owner occupancy requirement. If you do this I will build a dadu asap and help out with the housing issues seattle is facing.

» **Thank you for your comment. The comment is noted.**

Mengstu, Asrade

I own an AADU in Leschi, and I very much support Alternative 2. I think homeowners with an ADU should be given the choice of renting out their entire house (both the main house and the ADU) if they choose to do so. Tying them to their house because of the ADU is one of the reasons people shy away from building an ADU in the first place. I support the elimination of the homeowner occupancy requirement.

» **Thank you for your comment. The comment is noted.**

Merkle-, Michelle

I like the direction we're going with these alternatives. Agree that min. lot size of 3200 s.f. is wise. I like the idea of extending area to 1,000 sf, excluding garage and storage areas. Would you also consider including mechanical spaces? Are mechanical spaces part of a storage area? Wondering if there could be even greater height flexibility in the alternatives.

I notice that the DADU sketches/representations tend to hide the structure behind the main house. Instead, I would like to be able to announce a beautiful structural, along with functionality, versatility, great design, and many sustainable aspects. If I were able to raise the height limit by 3-4 ft., I could create a structure that is close to the same height as my current home, and allow for railing for a rooftop deck, which would have views on all sides, including a view of the ball park across the street (a view my husband and I have enjoyed from our home for many years, and would like to make available for the cottage, as well).

The extra height would also allow for an elevator addition (in 10 years) which would extend to the rooftop deck. We plan to retire in the DADU, eventually, and like the idea of building accessibility/aging in place options into the design. I wonder if I designed a home that more than met (and on many components exceeded) standards, and could show benefit to my building design (solar, heat pump, green roof and green deck, water catchment system, shed roof, and green, local materials + a well-insulated structure) with a list of economic benefits (versatile area- 7 minutes to downtown, across street from 16-acre park, 5-minute bus ride to the UW, etc.), if you would consider reducing the structure height limit.

In one alternative, there's mention of height limit restriction excluding things like 'dormers that add space' (not an exact quote). I believe my overall design (which has no dormers) makes great use of space with no wasted areas. My DADU design is an example of how you can do a lot with 1,000 sf, and preserve green space, have minimal impact, and add tremendous beauty to the neighborhood. Hoping you would consider one exception (height limit) with my design. In addition to the above points, I think the DADU would look better if it were the same height or slightly higher than my current home height (2 stories w/ semi-lit basement).

Thanks for your time and energy.

Michelle Merkle

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

Messier, Judie

I support Alternative 2 WITH THE FOLLOWING EXCEPTIONS: (1) Off-Street Parking Requirements should be Alternative 1 or Alternative 3; (2) Owner-Occupancy Requirements should be Alternative 1 or Alternative 3; (3) Predevelopment costs: I suggest that Seattle follow the lead of Portland, OR which on May 3, 2018 permanently waived their system development charges on their ADUs. This will strongly incentivize those who are considering constructing an ADU or DADU.

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. Please see Chapter 2 for a description of what is included related to reducing costs, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

There should be an off-street parking requirement, equivalent to Alternative 1 or Alternative 3.

- » **Thank you for your comment. The comment is noted.**

ADUs and DADUs can only be an improvement on the UGLY multi-unit buildings that developers are constructing everywhere, that look like cardboard boxes with windows, and do not in any way match the character of the extant neighborhood..!!

» **Thank you for your comment. The comment is noted.**

microhouse

There is already a parking waiver system which allows for conditions where the cost to add parking is expensive or otherwise infeasible. If we are serious about building equitable communities we shouldn't be cavalier about parking. Those who depend most on cars are the working poor and families with children. More than others, the working poor don't have the luxury of having just one job in an urban center served by transit. They need a car to get to multiple jobs in dispersed locations, often in off hours. Similarly, it is virtually impossible for families with young children to function in Seattle without a car.

» **Please note that the existing regulations do not allow a parking waiver due to financial constraints. The Director of the Seattle Department of Construction and Inspections may waive the off-street parking space requirement for an ADU if: the topography or location of existing principal or accessory structures on the lot makes provision of an off-street parking space physically infeasible; or the lot is located in a Restricted Parking Zone (RPZ) and a current parking study is submitted showing a utilization rate of less than 75 percent for on-street parking within 400 feet of all property lines of the site.**

Special consideration should be given to alley and corner lots to handle increased density.

» **Thank you for your comment. The comment is noted.**

Comment by Alternate:

1. Number of ADU's on a lot: Alternative 1 no action or Alternative 3 Allow an ADU and DADU on lot while maintaining the owner occupancy covenant.

DADUs built under current land-use have an impact to the built environment but one generally in keeping with current development patterns in SFR zones. Allowing three units especially in combination with the removal of the owner occupancy requirement will lead to SFRs designed and built to be rentals with a much higher combined value. Because the combined rentals will have a higher value than one smaller SFR there will be financial incentive to increase the demolition of naturally occurring affordable SFR housing. In addition, the higher combined value of three units will make their purchase that much less obtainable for a family and more appealing for an out of area investor. It has been well documented in the HALA literature that opportunity gaps exist based on proximity and home ownership. Ownership is one of the primary means of accumulating and maintaining household wealth. This is true for marginalized communities but also for middle class families. Allowing more than one ADU per lot, and eliminating the owner occupancy requirement, will reduce the amount of affordable housing available to families to own.

2. Parking: Remove parking requirement for ADUs. Alternative 1: no action.

There is already a parking waiver system which allows for conditions where the cost to add parking is expensive or otherwise infeasible. If we are serious about building equitable communities we shouldn't be cavalier about parking. Those who depend most on cars are the working poor and families with children. More than others, the working poor don't have the luxury of having just one job in an urban center served by transit. They need a car to get to multiple jobs in dispersed locations, often in off hours. Similarly, it is virtually impossible for families with young children to function in Seattle without a car.

3. Owner Occupancy: Alternative 1 or Alternative 3

The EIS looks at the effects of removing the requirement all together for the sake of studying the impacts. The original proposal to sunset owner occupancy after a period of time is good and should minimize the destruction of naturally occurring affordable housing by speculative developers. The period of time should be 3 years. However, owner occupancy should be required for all DADUs used short term rentals.

4. Reduce minimum lot size: Alternative 3

We already design many cottages on lots less than 4,000 sq. ft in size and the size of the cottage on smaller lots is driven by lot coverage as it should be.

Additional alternatives: Portland and Vancouver give special consideration to alley lots and corner lots. These lots can more readily handle increased development without disrupting the neighborhood fabric.

5. Increasing the allowable cottage size from 800 to 1,000 sq ft.: Alternative 3

increasing the allowable size 200 sq. ft. is a great idea and makes it easier to fit in two bedrooms. However, Alternative 2 excludes the garage and other storage from this calculation potentially allowing 2,000 sq. ft. ADUs. We frequently design cottages where the garage space is not intended for parking but as part of the cottage. The city can't and shouldn't mandate that garages are used for parking but not including this space in the allowable square footage will unnecessarily increase the allowable size and bulk of DADUs. And will have a negative impact on the character of neighborhoods, the amount of natural light and vegetation available.

6. Additional Height: Alternative 1 (no action)

While almost all of the cottages we design are built to the allowable height limit the current height limit is adequate for a two story structure. Additional height can reduce the amount of sunlight reaching neighboring yards. The multi-family code has provisions that allow additional height with a consideration for the impact of shading on neighboring properties. Something similar can and should be adopted for DADUs wanting higher height limits.

7. Lot coverage Limit: Maintain.

Recognizing that yards do have a value both for families raising children and as green spaces and as a way to reduce stormwater runoff.

8. Rear yard coverage alternate: Increase to 60% (Support):

The proposed changes don't actually increase the total amount of lot coverage allowed.

9. Rooftop features alternate (Support):

Allowing rooftop features, namely shed dormers to extend above the base ("eave height") will not increase the bulk of DADUs allowed under the current land use code and therefor have no environmental impact but will facilitate good design.

10. Location of entry alternate (Support): the alternative to allow entries located facing the nearest lot line as long as the entrance is located 10 ft or more away.

11: Maximum Household Size: No change, Alternate 1 or 3

Alternative: increase the household size along with maintaining owner occupancy requirements.

12: MHA fees would apply when an owner applies for a second ADU.

MHA fees will discourage the creation of additional units. It would seem better to require that additional units, if allowed, meet affordable housing guidelines.

13: Reduce pre-development costs by 10%.

SDCI can start by assigning a designated reviewer for DADUs which will eliminate inconsistencies and streamline the review process saving both time and money.

Additional alternative: SDCI can waive fees for DADUs with affordable housing criteria.

14. Introduce a maximum FAR ratio: Alternate 3

This is a big introduction into the EIS study. Currently, the FAR is not restricted in single family zones and size is restricted by setbacks and lot coverage. As shown in the EIS introducing an FAR limit will increase the number of smaller more affordable houses being built and reduce the destruction of naturally occurring affordable housing.

- » **Please see Section 4.1, Housing and Socioeconomics, for a discussion of impacts due to removal of the owner-occupancy requirement. The analysis shows that under all action alternatives, the number of demolitions will decrease. Please also see the frequent comment response concerning impacts to parking.**

The EIS provides a useful tool for community members and the city to evaluate the impacts of growth in residential neighborhoods. The information gathered can and should be used shape policy in our changing city. Given the information presented, we support Alternative 3 with its emphasis on maintaining the scale of existing development in single family residential zones. Most importantly the EIS finds that Alternate 3 will reduce the amount of natural occurring affordable housing lost to redevelopment. We feel that a moderate pace of scaled growth will lead to more equitable and environmentally sustainable Seattle that maintains a strong sense of place.

- » **Thank you for your comment. The comment is noted.**

Backyard cottages are a great addition to our city providing the low hanging fruit for increasing urban density while providing housing opportunities for families. The EIS study finds that backyard cottages increase housing options in areas that are deemed to have the highest access to opportunity. In fact we see this trend on an ongoing basis. A majority of the cottages we design (greater than 10% of Seattle DADUs to date) are being built as rentals. And while the cost of construction is relatively uniform across the city, rental rates vary greatly. As a result, the return on investment is higher for a cottage built in a more desirable neighborhood with higher rental rates.

As rental rates have increased so to have the number of backyard cottages built. Current rates of production are close to 150 new DADUs per year. The EIS analysis finds that Alternate 1 (no action) would result in the production of 1,890 new DADUs, Alternate 2 (representing the broadest range of changes) would result in 1,820 new DADUs and Alternative 3 would result in 1,705 new DADUs being built in the next ten years. It is interesting to note, that of the alternates, the highest number of DADUs would be produced under Alternate 1 which represents no change to the current land use code. The increase in number of AADUS under the proposed alternates seems to come from the removal of the owner occupancy covenant and the allowance of an additional ADU.

Allowing three units especially in combination with the removal of the owner occupancy requirement will lead to SFRs designed and built to be congregate rentals (not well suited to families) with a much higher combined value. Because the combined rentals will have a higher value than one smaller SFR there will be financial incentive to increase the demolition of naturally occurring affordable SFR housing. This is borne out by the draft EIS results. In addition, the higher combined value of three units will make their purchase that much less obtainable for a family and more appealing for an out of area investor. It has been well

documented in the HALA literature that opportunity gaps exist based on proximity and home ownership. Ownership is one of the primary means of accumulating and maintaining household wealth. This is true for marginalized communities but also for middle class families. Allowing more than one ADU per lot, and eliminating the owner occupancy requirement, will reduce the amount of affordable housing available to families to own.

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative, which would eliminate the owner-occupancy requirement, and Section 4.1, Housing and Socioeconomics, which analyzes removal of the owner-occupancy requirement.**

While a majority of the code changes are geared towards DADUs, it is interesting to note, that of the alternates, the highest number of DADUs would be produced under Alternate 1 which represents no change to the current land use code. Given those results, it would be hard to argue that the proposed changes are necessary to encourage DADUs.

The rate of AADU construction is scheduled to increase as a result of the changes in Alternates 2 and 3. Of these, the primary impact appears to be increasing the number of ADUs allowed per property. Alternate 3 does this while maintaining the owner occupancy requirements. Alternate 2 only marginally increasing the amount of ADUs built. However, removal of the owner occupancy requirement (Alt 2) will decrease inventory for home ownership, increase the loss of naturally occurring affordable housing through redevelopment, and encouraging speculative development from out of area investment groups.

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative, which would eliminate the owner-occupancy requirement, and Section 4.1, Housing and Socioeconomics, which analyzes removal of the owner-occupancy requirement.**

Stormwater: The EIS study is not adequate. Simply stating that the maximum allowable lot coverage is not increased under the proposal does not mean that there is no impact to increasing development in single family neighborhoods. Most ADU and DADU projects are under the drainage review threshold so do not provide any on site storage or mitigation. Seattle does not limit the amount of impervious surface or require stormwater management for projects that create less than 1,500 sf of new impervious surface. The result is that the impervious surface for a lot with a new backyard cottage could be 65%, or more for a small lot.

Increasing development in single family zones will increase stormwater runoff. As we witnessed, when the west point waste treatment plant went down, we are at capacity for dealing with urban stormwater runoff. The best alternative is maintain vegetation and to allow stormwater to enter the ground where it can be filtered and recharge streams and lakes. The rainwise program recognizes the value of groundwater infiltration but also importantly that it is less expensive to provide point source treatment than to create new treatment capacity. No funding source is identified in the draft EIS for increasing capacity for stormwater management.

- » **Thank you for your comment. The comment is noted. Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

Miller, Chad

Remove parking requirements. Single car culture isn't sustainable and transportation infrastructure has shifted to transit, pedestrian, and bike based.

- » **Thank you for your comment. The comment is noted.**

Miller, Krystal

I enthusiastically support Alternative 2 for changes to the rules around ADU and DADU development in the city of Seattle. The removal of a parking requirement, the repeal of the owner-occupancy requirement and the easing of other existing restrictions would help to create a variety of housing types for our diverse population, many who may be forced to leave to keep their housing costs a reasonable part of their spending.

Alternative 2 would provide an option for those who would like to provide nearby housing for senior or disabled family members they would like to care for while allowing the dignity and independence for those individuals to have their own space and privacy. This is something my husband and I frequently discuss as my parents age out of the ability to care for my brother with autism--this is one way we could provide care for him and still allow them the ability to care for his own space and maintain his right to privacy.

The easing of the owner-occupancy requirement would also create more housing options for those who wish to own real estate as part of their business or estate, but for various reason are not able to live in Seattle. It gives more freedom for those who need or want to leave the city to open their home to renters without needing to sell their home, possibly reducing the housing supply should the future owner not rent out units on the property.

The removal of the parking requirement is simply common sense for a rapidly urbanizing city during a critical moment in our local and global environment. Parking requirements also keep the cost of housing higher, and also would prevent units from being build on properties that aren't able to provide off-street parking.

» **Thank you for your comment. The comment is noted.**

Thank you so much for considering changes to the existing ADU requirements to help lower the cost of housing and increase the availability and type of housing for those who currently live, and want to live, in Seattle. I am a single-family homeowner, who owns a personal vehicle, with ADU's on my block, and support the work by the City of Seattle to increase housing choices in Seattle.

» **Thank you for your comment. The comment is noted.**

Miller, Scott

I'm so please to see the City of Seattle making progress on bringing common sense reforms to the development of housing options that integrate with existing single family zoned neighborhoods. This is especially important with the context of the fight over low income housing costs and proposed taxes. The Queen Anne Council's fight against this common sense reform reflects the worst aspects of NIMBYism in our City.

» **Thank you for your comment. The comment is noted.**

Mitchell, Ben

In general the DEIS shows that the action alternatives have substantial "breathing room" for causing any adverse impacts. This suggests that rules could be further relaxed without risk. Most importantly, the city should analyze allowing three ADUs per lot. Analysis could be simplified by assuming an upper-bound of 50 percent increase in ADU production. The city should also analyze a lower minimum lot size for DADUs (2,000 ft²), an allowance for two DADUs, an increase in the maximum size for AADUs (at least 1,500 ft²), and removal of limits on the number of unrelated occupants.

Thank you for the opportunity to comment.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

The DEIS demonstrates that the proposed ADU rule changes under either action alternative would have no significant adverse impacts on communities. I believe that the DEIS supports the broadest range of changes to the land use code, and therefore I strongly support Alternative 2 rather than Alternative 3.

Alternative 2 updates Seattle's existing ADU regulations in all the most important ways to allow more homeowners to construct these much-needed, flexible homes:

- allows two ADUs per lot
- removes all off-street parking requirements
- lowers the minimum lot size for detached ADUs from 4,000 to 3,200 ft²
- removes the owner occupancy requirement
- raises the occupancy limit on unrelated people from 8 to 12
- relaxes various size restrictions for detached ADUs

For the final preferred alternative, I support Alternative 2 as proposed, with the following modifications:

1. allowance for two attached ADUs (as in Alternative 3) or two detached ADUs, or one of each
2. minimum lot size of 2,000 ft² for detached ADUs
3. increase in maximum height of three feet over the existing limit, regardless of lot width, for detached ADUs
4. increase in maximum height of two additional feet for projects with green roofs or those pursuing the city's "Priority Green" program
5. maximum size limit of 1,500 ft² for attached ADUs
6. removal of the occupancy limit on unrelated people
7. allowance for placement of a detached ADU in a lot's front yard or side yard
8. removal of all restrictions on the location of entries for detached ADUs

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Monteleone, Rebecca, Sierra Club Seattle Group

Dear Ms. Pennucci,

Thank you for the opportunity to comment on the draft Environmental Impact Statement regarding Accessory Dwelling Units (ADUs). The Sierra Club strongly supports policies that will allow for more ADUs, especially by reducing barriers to their construction.

Sierra Club supports Alternative 2, along with a preference for one provision from Alternative 3. Alternative 2 represents the most improvement in adding to supply of ADUs, and has the greatest

potential for the city to make progress in sustainability and affordability. We also support the Alternative 3 provision that allows construction of a second attached ADU as a substitute for a backyard cottage. The minimum lot size assessed in the Draft EIS for adding an ADU should be reduced below the 3,200 square foot area which was considered. We suggest reworking the pertinent analyses using a 2,500 square foot minimum lot size in the final EIS.

ADUs and DADUs represent greener, more affordable housing and give owners more flexibility. ADUs and DADUs can support large or intergenerational families who have outgrown their existing home or whose elders have moved in with their younger relatives. They can provide an opening for a young family to buy a home and offset their mortgage through rental income--allowing them to build equity in a difficult market. ADUs and DADUs are also more sustainable. Smaller homes generally use less energy and have a smaller climate impact. They also allow for more urban density, which reduces sprawl and the destruction of the environment. And by reducing commute times, carbon emissions are also reduced.

One reason Sierra Club strongly supports Alternative 2 is because it eliminates the requirement for off-street parking when building ADUs and DADUs. Overall, the EIS finds that ADU production would not have an adverse impact on the availability of on-street parking. In cases where the City anticipates minor impacts (>85% of street parking capacity is utilized), parking strategies such as providing secure bike parking, subsidized transit passes for ADU residents, and subsidized ride or car sharing access should be required as mitigation for local parking impacts. Single-occupancy vehicles cannot be the future if we are going to combat climate change and manage traffic in a vibrant urban area. Requiring ADUs to have off-street parking is a tremendously limiting factor that will only prevent their development while solidifying reliance on single-occupancy vehicles.

The projected number of new backyard cottages would cover "less than 0.1 percent of the total tree canopy in single-family residential areas" according to the EIS analysis. We especially support having no off-street parking required for ADUs given the EIS finding that, "removing the off-street parking requirement could reduce the amount of vegetation and tree removal otherwise needed to accommodate a parking space when creating an ADU."

We also believe that the development of more ADUs is an equitable solution that represents our works in centering equity, justice, and inclusion. Alternatives 2 and 3 both represent fewer physical teardowns, and thus less physical displacement, than taking no action. Projections for Alternative 2 lead to fewer teardowns than does the status quo because making it easier to build ADUs shifts the financial benefit away from teardowns in many cases. And, as detailed above, ADUs also present opportunities for intergenerational and/or large families. Additionally, creating more living units is one factor that mitigate the increase in housing prices, since supply does not currently meet demand.

The Sierra Club urges the city to adopt Alternative 2 and expand housing choices by supporting more ADUs and DADUs.

Thank you for considering our comments.

Sincerely,

Rebecca Monteleone

Chair, Sierra Club Seattle Group

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Moriarty, Ryan

Removing the barrier of creating additional parking is essential for growing our density and improving transit ridership. Please ensure this is part of the solution.

» **Thank you for your comment. The comment is noted.**

Mountjoy-Venning, Cliff

Your report notes that single-family zoning was started as a way to exclude minorities and low-income people from certain areas of the city, and that it continues to serve that function today. So instead of considering how changes might be "incompatible with existing development in Seattle's single-family zones", perhaps we should be looking at how single-family zones are incompatible with creating an equitable city as we continue to grow.

» **Thank you for your comment. The comment is noted.**

Alternative 2 is clearly the superior option in almost every category: it doesn't make sense for there to be owner occupancy requirements - what if the owner needs to move away? They shouldn't be forced to sell or leave the property vacant. There should also be no parking requirements. We already have too much empty parking in the city, and if that ever changes, we should rely on market forces to provide additional parking rather than force every lot to include parking whether it will be used or not. It's also important to exclude any garages from the floor area, since that isn't actually part of the livable structure. The one change I would suggest is to remove the limit on percentage of area roof features can take up. You should be able to design any kind of roof provided it is within the height limit.

» **Thank you for your comment. The comment is noted.**

Allowing more ADUs, and making them easier and cheaper to build is a necessary step towards solving our housing crisis. However, it doesn't go nearly far enough. The best alternative would only add 3,300 units according to your analysis, far below what is needed to keep up with demand for housing. If we really want to solve this crisis, then it's time for Seattle to do away with single-family zoning. SFZ is racist in origin and continues to exclude minorities and low income people, and yet it makes up over half of the residential land in our city. Having broader areas of lowrise and medium rise density has numerous advantages over our current system of largely suburban style lots with pockets of intense density. Medium and lowrise buildings are much more visually appealing than full-block behemoths. People decry much of the development in Ballard because it's ugly, yet the blocks of pre-war three-story buildings in Capitol Hill are celebrated. It also increases the resilience of neighborhoods by allowing smaller changes over time. Those full block behemoths can only be replaced one full block at a time, whereas smaller scale density can change and grow more naturally. Finally, smaller scale density is cheaper to build - both because it's smaller and because you can avoid needed steel and concrete with shorter buildings. This allows a wider swath of the city to potentially own property and build equity, rather than forcing all new development to be made by multi-million dollar companies.

Increasing the supply of ADUs is an overdue step, but really the conversation should be about making LR1 the minimum zoning code in the city.

» **Please see updated information in Section 4.1, Housing and Socioeconomics, on proposed ADU production resulting from the proposed changes. Please note that the proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Rezoning single-family zones to multifamily zones is outside the scope of this EIS.**

Alternative two will add the most housing units and therefore should be selected. We need more housing now!

» **Thank you for your comment. The comment is noted.**

Mullendore, Zoe

I am supportive of this concept and encourage the city to move forward with allowing ADU's in Seattle.

» **Thank you for your comment. The comment is noted.**

Murphy, Akira

I strongly support alternative 3 in the hopes that it will reduce rent.

» **Thank you for your comment. The comment is noted.**

I strongly support alternative 3, and 2 to a lesser extent, and wish this process had been quicker and not held up as much.

» **Thank you for your comment. The comment is noted.**

Myers, Zachary

I agree on certain aspects of both alternatives which will reduce barriers to construction such as removing required parking and the owner-occupancy requirement. The former will help with flexibility on siting and construction of ADUz and the later will help create a more dynamic housing market. However such restrictions as arbitrary unit sizes for these cottages may limit the amount of potential units created in Single Family Home Areas.

» **Thank you for your comment. The comment is noted.**

We are drastically under built in most areas of the city especially in the areas presented in this plan. ADU's will do little to change the aesthetics, I believe it will help create a more robust neighborhood culture to a majority of the city. I think figuring out a way to utilize green space effectively will be important for the city to try to incentivize. We will need to figure out a viable and expedited replacement method if tree canopy or vegetation is reduced to fit a home on a lot.

» **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use, and exceptions added to the Preferred Alternative to preserve trees.**

These units also create more density and options for people who don't want to live in a busy urban district or on a main commercial strip. Relaxing these ADU requirements will also allow local homeowners to utilize their existing parcel and provide extra income to stay in the city. Local landlords are key to a healthy city and rental market, development and housing corps from out of town our market for their bottom-line is worrisome to say the least. With median home prices approaching a million dollars in most single family home neighborhoods in the city and half of the current work force making under 50,000 dollars it is important that we have affordable options for homebuyers and ADU's fit somewhere in the area's housing mix. We should be building neighborhoods that strive to house people from diverse income brackets. Helping prod this equity will create a more stable social fabric in the city.

» **Thank you for your comment. The comment is noted.**

I agree with the governments findings on this, ADU's will allow for a more flexible and more robust land use on existing land within the city of Seattle. It will benefit the city because there will be more people living on one parcel therefore making it more efficient for those parcels to be serviced by the city.

» **Thank you for your comment. The comment is noted.**

Taking the parking requirement out will help better utilize parcel development and also help increase the density of these neighborhoods. A car is a vastly inefficient way to move around the city and the parking space and structures related to it's storage is space ill-allocated. This current pattern of land use in single family homes creates a weak car urbanism that benefits no one. It creates a system where households have too many cars per capita and transit routes go under-utilized by a majority of the neighborhood. Also this would help reduce congestion and help meet our climate goals if these adus were placed in neighborhoods with high transit frequency but low density. Renters and buyers of these units will figure out ways to get to and from work without a personal car.

» **Thank you for your comment. The comment is noted.**

As I mentioned in land use, besides a more complex connection to the main utility lines and infrastructure these dwellings will make more economical sense to hook up and scale up with this development. It is more efficient than traditional development and will take less linear feet of infrastructure for these utilities to connect to these units rather than a suburban style development. As far as schools, these smaller homes might be one of the only affordable units for families in these neighborhoods. This is one reason i'm against the 1,000 sq ft limit, a few extra hundred square feet might allow a family of 4 to live a bit more comfortably and stay in the city. Most good Seattle Public Schools are located in neighborhood's with 1 million + home values. These ADU's will help retain some smaller families and help diversify schools in Seattle by allowing lower income families to attend schools with traditionally high incomes and wealth. Lastly, with the development of more roof runoff it will be important for SPU's Rainwise Program to expand and allow for cistern or rain garden installations at the ADU's especially if the existing house on the parcel is eligible. Adding a Adu might double the potential captured area of rain on one parcel. It will be crucial to figure out a way to reduce CSO's in basins that are single family and benefit from this development. Also from a design perspective it may be more practical to combine cisterns and rain gardens installations on one parcel.

» **Thank you for your comment. The comment is noted.**

Naess, Ralph

I think including parking in the footprint of the ADU's is reasonable as outlined in alternative 3.

» **Thank you for your comment. The comment is noted.**

I am doubtful that this will have a meaningful impact on affordability, but its worth a try. Alternative 3 is preferred in that it will require property owners to live on the property. This will help to maintain neighborhood integrity and reduce the opportunity for landlords to create "boarding houses" out of ADU's and DADU's.

» **Thank you for your comment. The comment is noted.**

Gradual, smaller scale is the way to start. The law of unanticipated consequences means we cannot accurately project how this will impact communities, until it is implemented. Start slow. You can always ease regulations later.

» **Thank you for your comment. The comment is noted.**

Alternative 3 is a good compromise between aesthetics and improving housing access.

» **Thank you for your comment. The comment is noted.**

I support Alternative 3, because it will help maintain neighborhood integrity.

» **Thank you for your comment. The comment is noted.**

I support Alternative 3. Best compromise between increasing housing and maintaining neighborhoods.

» **Thank you for your comment. The comment is noted.**

Namkung, Ju

I live in Wallingford, in District 4 and am very concerned about the lack of affordable housing in Seattle. I myself am fortunate to be a homeowner but there are thousands who are no longer able to afford to buy homes in Seattle. We should allow for more rentable housing to help more people all along the income spectrum to be a part of our vibrant community. I favor Alternative 2 because it removes the owner-occupancy requirement and the parking requirement and reduces the barriers for owners to add ADUs to their properties.

» **Thank you for your comment. The comment is noted.**

Nan Todd -Smethurst

If your area is red lined to become multi- family what are your options

» **Thank you for your comment. The comment is noted.**

I am surprised that there are no allowances in the new code proposals for "true tiny houses " that are built to a standard building code of the City or A RIVA Code. In addition there is no indication of a staged conversion submittal .

There appears to be no increased pricing diversity if the new code changes are implemented .

In a City where lower cost options are necessary to provide for extended family living accommodations which will be rapidly increasing with the onslaught of an aging population , and disabled adults and children with special needs-- there are no provisions in this code.

» **The proposal evaluated in this EIS focuses on proposed changes to the Land Use Code for the construction of ADUs. Modifying what constitutes a single-family dwelling by removing the requirement that the structure has a permanent foundation is outside the scope of this EIS.**

Neiman, David

I support Option 2, as it provides the most opportunity for homeowners to build ADU's and DADU's with the fewest restrictions. I support incorporation of one idea from alternative 3 which would allow (2) ADU's in any form (either attached or detached. I would also recommend loosening of restrictions that govern where DADU's can be placed, and removal of all restrictions for where unit entries can be located.

» **Thank you for your comment. The comment is noted.**

Nest Architecture & Design,

Thank you for all your work! I support comments by Dan Bertolet of Sightline dated June 8, 2018. Mine is an abridged version of MOAR Backyard Cottages' comments by co-organizers Matt H & Laura L with added comments based on my experience designing 10 DADUs. I support:

- * Eliminate parking requirement. All of the DADUs ive designed had ample street parking. Owners still park on the street and have planted gardens and chicken coops in the driveways.
- * Reduce minimum lot size for ADUs. Anyone regardless of lot size they own should be able to add an ADU.
- * Portland and Vancouver dont have owner occupancy requirements and they are ahead of Seattle in production. Single Family rental houses dont have owner occupancy requirements.
- * Freedom to choose best fit and type when creating accessory dwelling units. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures. In addition, allow Jr Adus with minimal permitting, to create more affordable, legal units (until they turn 21).
- * Increase height allowances for green roofs. Add height allowances and flexibility of material and methods to shield from view/privacy between poorly scaled transition from SF zones to NC zones (if those SF zones have no chance of being rezoned to a MF, to buffer between SF & NC).
- * Increase rear yard coverage for additional flexibility/buffering neighbors privacy, better chance of preserving trees.
- * Reduce pre-development & permit costs by dedicating specialized reviewers to ADU/ DADU projects. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.
- * No MHA. Even without this fee, 3 potential homeowner clients have backed away. It is important to have owner/builders who have equity in home, as part of the affordable housing on solution.
 - » **Please see the response to the form letter included in Section 5.5.**

Newbold, Sheri

Thank you for the opportunity to comment on the Draft EIS, and for providing this thorough Draft EIS document.

I support providing the most flexibility for creating ADUs and DADUs. The more flexibility the code provides, the more units that will be created since the code will have more potential to meet the individual personal and property circumstances.

Alternative 2 of the three alternatives studied provides the most flexibility, and so I support all of the changes in Alternative 2.

Items where I suggest further study:

Alternative 2 #6: The height limit ought not be determined by lot width because regardless of lot width, there are building code requirements for minimum interior height as well as cultural preferences about interior height. Please study increasing the height limit for all DADUs regardless of lot width.

Alternative 2 # 13: Construction costs in Seattle are expensive. Construction cost (hard cost) is the main cost of creating DADUs and ADUs and is also one of the main impediments to their creation. To be clear, soft costs (pre-development and design) are a small portion of the total cost of building an ADU or DADU. There are multiple current ideas on how to reduce soft costs for ADU and DADU creation. These need to be studied more extensively.

One idea that has been discussed is to immediately remove the sewer capacity charge from the addition of a new DADU.

Another is to dedicate staff to review DADUs and ADUs. They also would review other projects; however, this trained, dedicated staff would consistently review all submitted ADU and DADU projects which will reduce the amount of calendar and design time needed to permit these structures. Beyond this, developing a protocol for ADUs and DADUs to be permitted under the Subject to Field Inspection (STFI) process would further reduce the calendar time and therefore cost required to permit these structures.

The idea of pre-approved plans has been discussed by various parties to save on soft costs. There are many constraints on Seattle sites: Existing topography, existing trees, total lot coverage already used by other existing to remain structures, access to the property, plus desired site design, etc. In order for a pre-approved plan to actually be functional and work without alteration, the city will need to allow departures from other rules, such as allowing additional total lot coverage when using a pre-approved plan, or allowing a departure from the height limit. Without this built-in flexibility, pre-approved plans will need to be altered significantly, which will negate their intended purpose.

Getting back to construction cost, which is one of the main impediments to building ADUs and DADUs, there needs to be more information studied and put in place:

A) Education: Workshops and seminars on why and process and costs to create an ADU and DADU.

B) Some property owners have cash or equity (HELOC) that they can use to pay for a DADU/ADU. If one does not, there needs to be a clear path for a construction loan to build an additional unit. To my knowledge, construction loans underwritten by FNMA/ FMAC are not approved for second units, so only banks that do portfolio lending programs (not underwritten by FNMA/FMAC) can do construction loans for ADUs/DADUs. Research and publication of streamlined construction loan programs for building DADUs and ADUs from local lenders would go a long way to help owners finance the process. Beyond this, allowing the potential rental income to be used for qualification would help more people be approved.

C) Those owners who would not qualify for a bank construction loan could use alternate financing programs that may be created for this purpose.

D) Incentives: All of the items in Alternative 2 create more flexibility which in itself is a passive incentive. Beyond this ADUs and DADUs need to be incentivized proactively. Please study what would actually promote their creation, such as programs for low-cost construction loans in exchange for leasing the dwelling unit for a to be determined period of time at a lower rent; or allowing greater total lot coverage than 35% if creating both a DADU and ADU; or extra height for using a sustainable building method and creating both a DADU and ADU, etc. Please do not disincentivize them by adding MHA fees to the cost of creating a DADU or ADU.

Thank you.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Nguyen, Denis

I refer to Section 1.7 which states that Alternative 2 would produce an extra 1440 ADUs over a 10-year period. I find it absurd that the city is spending an inordinate amount of money on this study when the number of new units we're discussing amounts to 4 apartment towers OVER TEN YEARS.

Seattle is in a housing *emergency*. While we waste time with these EIS meetings, 1500 people settle in the Greater Seattle Area every week. Why are we giving existing property owners the opportunity to hold up rezoning while they sit on their laurels and capture appreciating land values because they are actively withholding supply in the market.

The problem is simple: Seattle has a housing supply problem. Let's put a stop to the unfounded transfer of wealth to property owners by approving these types of rezones rapidly.

» **Please see the frequent comment response concerning ADU production estimates.**

NK Architects,

My comments address the Draft EIS as numbered by the Draft document;

1. Number of ADU's allowed: Either Alt 2 or Alt 3 is a win for the city's desire to make affordable housing take place in a simple and cost effective manner. I support both Alts but feel that Alt 2 is more readily acceptable than Alt 3.

2. Off-street Parking: I strongly encourage the City to require NO off-street parking. Parking of personal vehicles on city streets is a benefit offered by the citizens of this community and should be available to all, especially those living in smaller units that are allowed as AADU's and DADU's. The community owns the streets. All members of the community should share access. As our neighborhoods are today, most of the existing single family homes have cars that are parked on this public property. Therefore extending this opportunity to newer members of the community who may occupy accessory dwellings seems to be the right thing to do. Reduce the cost of such housing by any and all means necessary.

3. Occupancy Requirements: I strongly support Alt 2 in which owners occupancy is NOT required as this will lead to more affordable units being available in creating the diverse neighborhoods that are healthy and efficient.

4. Minimum Lot Size: I support the reduced minimum lot size of 3200 sq. ft.

5. Maximum gross floor area: I support Alt 2 with 1,000 sq. ft. EXCLUDING the garage and storage areas. Instead the lot coverage of both AADU's and DADU's should govern as suggested in item #7.

6. Maximum height: It is critical that the height be increased to allow for the real needs of 2-story DADU's versus a severely constrained and tortured design. In addition, special allowance needs to be allowed for renewable energy features such as PhotoVoltaic panels and Solar Thermal collection arrays. Our impending climate disruption requires that we maximize the available roof area for renewable energy generation wherever and whenever possible.

7. Lot Coverage: I support the NO Change proposed.

8. Rear Yard coverage: I support the proposed change as noted.

9. Roof Features: Please, very important, we must allow PV and Solar Thermal features exceed otherwise required height limits. Very critical to our community response to Climate Change which is a stated City goal.

10. Location of DADU entry: My strong preference is to allow for entries on a case by case basis rather than a simple rule that will not fit many conditions. Let's not create obstacles to creative design. Instead the city can recommend mitigating impacts that may affect neighboring properties and have this evaluated on a case by case basis.

11. Maximum household size: Yes, please change to 12 to allow for reasonable occupancy of the proposed two accessory units.

12. MHA requirements: no need to burden what is already a more affordable alternative with such constraints as MHA requirements.

13. Predevelopment costs: Alt 2 - very important. Please make any and all accommodations to reduce the costs of developing AADU's and DADU's including Sewer Capacity Charges (impacts are diminishing with low flow fixtures) and permitting costs and time frames.

14. Maximum floor area ration FAR: Bad ideas in Alt 3 to propose new FAR limits on single family lots. Stick with lot coverage and height limits. Thank you.

» **Please also see the response to the form letter included in Section 5.5.**

Parking: The Congress for New Urbanism has promoted street parking of cars as an improvement to the pedestrian quality of service on our streets. I am in agreement that street parking should allowed and encouraged. If parking becomes a challenge we are therefore encouraging other forms of transportation that are generally available such as: car sharing services, bike sharing, public transportation, walking etc.

» **Thank you for your comment. The comment is noted.**

Thank you for the City of Seattle taking a leading role in improving the livability and affordability of our neighborhoods by proposing the changes herein addressed. Please proceed to approve such legislation as soon as reasonably possible.

» **Thank you for your comment. The comment is noted.**

Aesthetics: I support the idea that allowing for more smaller units will result in fewer tear downs of our existing housing and therefore serve to preserve the existing look and feel our neighborhoods.

» **Thank you for your comment. The comment is noted.**

As a single family home owner in a popular and desirable in-city neighborhood, I fully support the changes being proposed in that they would improve our communities with diverse living accommodations, more choice in living arrangements for existing home owners and make better use of the existing city infrastructure of streets and utilities. Our communities will be improved.

» **Thank you for your comment. The comment is noted.**

I agree with the conclusion of the DRAFT EIS:

"No significant adverse impacts are anticipated to public services and utilities; therefore, no mitigation measures are proposed."

» **Thank you for your comment. The comment is noted.**

I strongly support the analysis put forth in the EIS related to affordability and displacement. Since LAND is the current key cost factor that remains very difficult to mitigate, allowing small accessory dwelling units allow for long term affordability of such smaller units within the land use pattern that we already

hve in place. I expect that fewer tear downs of exiting small homes will occur with the proposed relaxing of restrictions on accessory dwellings.

- » **Thank you for your comment. The comment is noted.**

No Phree Rent,

I prefer Alternate #2

- » **Thank you for your comment. The comment is noted.**

Nordby, Evan

I support Alternative 2. In particular, I support increasing the size of DADU's allowed, and removing the owner occupancy and parking requirements, in order to allow a broader range of ADU building under a broader range of circumstances, to encourage more affordable housing for families.

- » **Thank you for your comment. The comment is noted.**

Novak, Vaclav

I'm missing some positive impacts discussed: Reduced (not only CO₂) emissions from shorter commutes; increased safety coming with increased usage of bicycle infrastructure; decrease in car traffic associated with increased transit and bicycle ridership; increased walkability of the neighborhoods.

- » **Please see response to the frequent comments regarding positive impacts of the proposal.**

Nunes-Ueno, Elsa

The owner occupant requirement is a hindrance to people taking the plunge to build a backyard cottage or ADU if when they sell they either have to dismantle it or reduce the pool of buyers and eliminate investors. I feel there should be no owner occupancy requirement or a one-three year requirement that sunsets as the additional unit becomes grandfathered into the neighborhood.

- » **Thank you for your comment. The comment is noted.**

No parking requirement, please. We cannot become a denser place and reserve space for cars.

- » **Thank you for your comment. The comment is noted.**

We should free up homeowners to become part of the solution here and we do not need as much parking as people think we do.

- » **Thank you for your comment. The comment is noted.**

We need more density in single family zones

- » **Thank you for your comment. The comment is noted.**

Incentivize homeowners to build affordable housing too, not just developers! Many people want to do their part to help the housing crisis.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion**

of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.

Omana, Juan C.

Single family zoned areas are already vastly underserved by public transportation. Encouraging density in these areas (even if low-rise and low-impact like ADUs and DADUs) will only make congestion worse as these tenants will bring their single-occupancy vehicles to clog up neighborhood streets. As ideal as it would be to have excellent transit service and reduce car use, many Seattleites still drive cars, and that will not change in the near-term.

» **Thank you for your comment. The comment is noted.**

Rather than trying this half-hearted compromise, the city should be looking to encourage the development of condominiums and townhouses in select neighborhoods to allow for more ownership, as opposed to rentals. Likewise, the city should aim to preserve specific neighborhoods with exemplary character that give Seattle a sense of place. This can be achieved by allowing selective development to take hold in specific neighborhoods to increase property ownership but also maintain character (ADUs and DADUs will only create an underclass of tenants). The city should then seek to change the zoning in areas that are vastly under-utilized, such as along major arterials (Delridge Way SW; Aurora Ave N), to encourage more mixed-use development. This is where rental properties should be congregated, so that businesses and services can compete to meet the needs of tenants in the buildings above, while allowing many single family neighborhoods to maintain the charm that gives Seattle its identity. Finally, the city should do more to keep existing affordable housing from disappearing by offering incentives and assistance to landlords so that needed improvements can be made without raising rents significantly.

» **The proposal evaluated in the EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

I encourage the City of Seattle to make NO CHANGES to the current Land Use Code related to ADUs (pursuing the No Action Alternative).

» **Thank you for your comment. The comment is noted.**

I ask that the city council stop proposing stupid band-aid fixes to the housing crisis, and start getting serious about urban development and planning. Zoning changes and upzoning are going to be needed in some areas to meet housing demands, but you also have to realize that good times don't last forever. The headwinds are telling us that the current boom is reaching past its climax, and Seattleites don't want to be stuck with badly implemented policies during bust times. DADUs and ADUs are terrible way to close the housing gap.

» **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Please see Chapter 2, Alternatives, for a description of the objectives of the EIS; changes that go beyond ADUs are outside the scope of this EIS.**

The ratio of renters to property owners in Seattle is high. Encouraging more renters to live in single family zones will have broader negative economic impacts on the electorate which would favor less action on improving livability and more city resources spent addressing the needs of residents who are not rooted in the community. This will fundamentally change the character not just of single-family neighborhoods, but of the city as a whole. The property tax contributions of renters and property owners are not 1 to 1. The free market will only support so many rent increases to cover the costs of rising property taxes, and so those costs cannot necessarily be passed on to tenants. Encouraging more

tenants also reduces the tax base, which will make it more difficult for the city to fund various social program, much less meet the needs of the citizenry by maintaining infrastructure and providing services.

- » **The proposed Land Use Code changes would increase the number of renters; however, the owner of the rental units would still be required to pay property taxes.**

Seattle's public utilities are aging, and it is unfortunate that the impetus to replace sewer lines that are nearing their 8th decade of usage is on homeowners instead of the city. Allowing more density in single family neighborhoods through DADUs will put pressure on the existing utilities that could have disastrous consequences. It is unrealistic to expect that there will be sufficient new development to spur wholesale replacement of aging utility infrastructure. Further, more density requires greater services in terms of public safety. As stated above, tenants cannot be expected to absorb or contribute 1:1 on property taxes. Increasing the ratio of tenants to property owners in the city will de facto lower the tax base, so there will be less money to cover necessary services like police and fire departments. These deficiencies cannot be closed by asking for more money from property owners. At some point, they will leave if the tax burden is too troublesome.

- » **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

O'Meara, Erin

I support EIS Alternative 2, because it includes all the most needed changes:

allowance for 2 ADUs

removal of owner occupancy requirement

removal of parking requirements

reduction of minimum lot size

relaxation of DADU size limits

- » **Thank you for your comment. The comment is noted.**

Please continue to think about how we can create more housing for residents, and how these rules can support that effort.

- » **Thank you for your comment. The comment is noted.**

Owens, Eva

I dont think parking should be a requirement for building ADU and DADUS

- » **Thank you for your comment. The comment is noted.**

I am a home owner and tech worker based in Ballard. I believe that we should increase density and increase access to housing including allowing DADU and ADUs in single family home zones (like mine).

- » **Thank you for your comment. The comment is noted.**

Padelford, Gordon

reduce car parking requirements

- » **Thank you for your comment. The comment is noted.**

Please act to give people more housing options!

- » **Thank you for your comment. The comment is noted.**

I hope Seattle moves to adopt pre-approved designs that reflect our region's character like using natural materials (wood and stone).

- » **Thank you for your comment. The comment is noted.**

Parker, Grace

I strongly oppose this proposal. Single family neighborhoods become essentially upzoned without required infrastructure. There are also no safe-guards to turn quiet residential areas into transient rental properties. People who come and go as renters don't have the same level of concern as home owners. This is a direct blow to the concept of neighborhood in Seattle.

- » **Thank you for your comment. The comment is noted.**

Parker, Jeff

This one-size-fits-all effort to rezone sounds good because it simple, but long-term urban planning is hard and demands time and deep thought by trained experts. Let's not fool ourselves into thinking we can take shortcuts.

- » **Please see the frequent comment response regarding individual neighborhood review.**

Proposal to radically changed settled zoning laws may be driven by good intentions, but seemed to be uninformed at best and deliberately negligent at worst. The promised benefits of the proposed rezone are not supported by facts or best urban planning/development practices. The unintended consequences of such ideologically-driven programs are almost always negative and sometimes catastrophic.

- » **Thank you for your comment. The comment is noted.**

Single biggest beneficiary of zoning change will be developers, who will pack lots with grim and poorly constructed town homes they can sell for \$2 million each.

- » **Thank you for your comment. The comment is noted.**

Economics of rezone will be to drive cost of land up and by extension, the cost housing. It just transforms livable neighborhoods of un-affordable single family homes into unlivable neighborhoods of un-affordable townhomes.

- » **Please refer to Section 4.1, Housing and Socioeconomics, and Appendix A for a discussion of potential effects on the price of housing.**

Best example of aesthetic impact of proposed rezoning is Ballard. This once healthy community of families is now a blight -- so much so that urban planners around the world have added the pejorative

term "Ballardization" to their professional lexicon (to destroy the social fabric and aesthetic charm of a neighborhood).

» **Thank you for your comment. The comment is noted.**

Virtually no parking requirements for new town homes? Really?

» **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs in single-family zones. Parking requirements for townhomes are not considered and are outside the scope of the EIS.**

Pary, Miller

Hi! We need more housing in this city! Please help people build ADUs and backyard cottages.

» **Thank you for your comment. The comment is noted.**

Pederson, Art

ADUs/DADUs are an important means for increasing small scale affordable housing options in large sections of the city, otherwise limited by the underlying zoned housing density, such as in single-family zones. We need to do more than maintain the current system that the "no change" alternative would maintain.

Alternatives 2 and 3 share many good elements. I won't comment on those but instead focus on the removal of the owner occupancy requirement and the impact it will have on the ability of individuals/families to own an affordable stand-alone house in Seattle.

The proposal to remove the current owner occupancy requirement will open up all affected single-family zones to immense pressure from absentee investors who rightly see an opportunity to have 2 or more rental units on a lot without the burden of occupancy of at least one of those units. This business based decision (speculative exchange value) is at odds with the primarily non-business based interest (use value) of owner occupancy.

The Draft EIS does not consider this issue in any depth. The effects of dislocation and building tear-downs, which are important issues, are analyzed. But no analysis is presented of the price pressure this new and greatly expanded investment opportunity will create on the ability of a non-investor to simply own a stand-alone dwelling unit, whether on a small Fremont lot or large Broadview lot.

Currently, or as proposed in Alternative 3, which maintains the owner occupancy requirement, there are several reasons why a person would add an ADU: it could be simply to house a relative (a true "mother in law" unit) in a fully separate dwelling unit. Or it could be to have a dwelling unit to bring in extra income from an otherwise unused yard or interior area. Or it would be for the altruistic goal of increasing the pool of housing, maybe even in combination with the first two reasons. But that occurs now and would continue to occur within the context of an owner occupant making that choice.

Removal of the owner occupancy requirement will remove the natural break on escalating housing costs and thus the ability of the non-investor/not investor backed individual or family to afford ownership of a stand alone structure.

A second issue related to removing the owner occupancy requirement not addressed in the Draft EIS is the aesthetic impact of absentee ownership. One of the wonderful effects of owner occupancy on Seattle's visual quality are wonderfully landscaped yards, planting strips and other improvements. These are created through the immense amount of free labor/sweat equity that owner occupants invest into

their properties. These aren't done as economic decisions, like any improvement on an investment is done. While these sweat equity improvements likely add to the property's value at the time of eventual sale, they don't add any day to day marketability or income benefits to the property. That is not their purpose. Because the true cost of these improvements is mitigated/lessened by the owner's non-economic goal of the joy of gardening or landscaping and not paid out of pocket to a landscape designer or maintenance company, it is affordable.

However, an investor looks at the cost of everything relative to the return it brings, there is no "sweat equity" investment (there may be with the very small one property investor, but it diminishes to nothing with the larger investors). Improvements have costs for installation and maintenance; a lawn or standard "shrubbed-up" landscape tended by landscape management company is a much lower cost for installation and maintenance than a complex garden with a variety of plants that require constant tending and attention. Unless the rents are so high that they cover extra and extensive extraneous costs, any aesthetic investment will not be made.

I am a single family home owner as well as an owner of a multi-family building. I take great pride in my care of both. As a "landlord" I am proud that I provide a safe and attractive property to my tenants. But I do not put the same sweat equity into my rental property as into my house for the above reasons. I know that to add a couple of thousand dollars a year to an enhanced landscape plan (maintenance company, watering, plants and hardscape) means adding that directly to each tenant's monthly rent.

Some assert that the owner occupancy requirement suppresses the development of ADU's by somehow restricting owner flexibility for long term travel or living elsewhere. This is not true, as the current rules only require occupancy 6 months of the year with the ability to waive this for a longer absence time provided a statement of intent to return is made. While this may seem burdensome or inflexible to a few, it is far better to avoid the inevitable upward price pressure that will occur in single-family zones due to the economic logic of multi-family investment calculation. Or that if a single-family homeowner moves to another location and rents their former home they will now be prevented from adding an ADU. But this is a choice by the homeowner to become an investor. It should not be the goal of the revised ADU regulations to encourage or support non-owner occupant investment. The goal is to add affordable housing while preserving the character and affordability of single-family areas.

I strongly encourage the City to move ahead with adding flexibility to the current ADU/DADU regulations to increase the availability of smaller and affordable housing options throughout the City. Please do not do this at the expense of the affordability of ownership. The availability of affordable rental housing will increase under all three alternatives. Unless the intention of the City is to increase the ratio of renters to owners, only by retaining the owner occupancy requirement will the dual and worthy promises of affordable ownership and affordable rents have a chance of being maintained.

Thank you

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative and the owner-occupancy requirement and Section 4.1, Housing and Socioeconomics, for analysis removal of the owner-occupancy requirement.**

Pfister, Matt

Support Alternative 2

- » **Thank you for your comment. The comment is noted.**

Pickard, William

1. Off-street parking is a material issue. Insufficient parking is already a significant problem in single family zones. If someone who is adding an ADU does provide off street parking, they should receive a bonus of 300 sqft and 3 feet of additional height in return for each parking space added. Phrased differently, the City should provide an incentive for homeowners to provide off-street parking.

2. ALL utilities, including power and telephone lines, should be buried.

» **Thank you for your comment. The comment is noted.**

Piering, Pam

I am in favor of Alternate #3 in the following areas:

1. I oppose the idea of no off-street parking required, and support the requirement for off street parking when there is more than one additional unit on the lot.

2. I strongly oppose the idea that the home/ADU does not need to be owner-occupied, and I support the requirement that the home (or ADU) be owner occupied. This the most critical issue, in my opinion.

» **Thank you for your comment. The comment is noted.**

Pin, Yih

I fully support Alternative 2.

» **Thank you for your comment. The comment is noted.**

I do not care about visual character of SFH zones.

» **Thank you for your comment. The comment is noted.**

I fully support any change that allows more housing to be built.

» **Thank you for your comment. The comment is noted.**

I don't think compatibility with existing development is a valid concern.

» **Thank you for your comment. The comment is noted.**

I think we should make all offstreet parking metered.

» **Thank you for your comment. The comment is noted.**

I fully believe the city can scale to a larger population.

» **Thank you for your comment. The comment is noted.**

Pinsker, Danny

I support alternative 2, and generally any efforts that permit infill development to support multifamily housing without owner occupancy and parking requirements.

» **Thank you for your comment. The comment is noted.**

I support EIS Alternative 2 and the original HALA proposal.

» **Thank you for your comment. The comment is noted.**

Vienna (11,799/sq mi) : Seattle (4,271/sq mi) - we can do it.

» **Thank you for your comment. The comment is noted.**

More and better housing and transit options can only improve affordability and livability for all income types.

» **Thank you for your comment. The comment is noted.**

Multifamily development is prohibited by zoning in 90% of Seattle. This is very poor land use and encourages sprawl throughout the region. Increase density, improve infrastructure with the improved tax base.

» **Thank you for your comment. The comment is noted.**

We need grade separated transit everywhere. Bikes and buses should both have restricted access routes throughout the city, please. Also more light rail.

» **Thank you for your comment. The comment is noted.**

This city should be promoting efficiency, ruggedization and availability improvements for all consumers and producers. More encouragement of roof top solar, grid tied storage, municipal broadband and finally consumer grade rainwater/stormwater management.

» **Thank you for your comment. The comment is noted.**

Placido, Allison

I suspect upgrades should be made throughout the city (SPECIFICALLY sewers in north Seattle/Broadview).

» **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

I like Alt 2, which seems to remove the most barriers

» **Thank you for your comment. The comment is noted.**

We MUST do better to make Seattle affordable for people of all income levels.

» **Thank you for your comment. The comment is noted.**

AUDs are common in my neighborhood (Broadview). I have 2. Honestly, you really don't even notice them when thoughtful landscaping/tree canopy care is taken.

» **Thank you for your comment. The comment is noted.**

Just do whatever needs to be done to remove barriers to AUDs and get this crackin'.

» **Thank you for your comment. The comment is noted.**

This is an extensive study. No comment here

» **Thank you for your comment. The comment is noted.**

Sidewalks should be readily available everywhere first. It increases use of public transportation and gets kids to school safely. I see that is addressed here, but it should be prioritized. In Broadview, it's terrible (elementary aged kids walking on muddy, sloped grass or gravel on roadsides to keep out of the way of vehicles) because there are no sidewalks for them to use to get to school.

» **Thank you for your comment. The comment is noted.**

Pryor, Inness

Yes please!

» **Thank you for your comment. The comment is noted.**

Pugh, Kathleen

I encourage a full environmental impact analysis especially concerning loss of grass, trees and bushes where the accessory dwelling units are built and the effect of encouraging even more cars by not limiting them in neighborhoods.

» **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

Pullman, Aubrey

Don't require parking!

» **Thank you for your comment. The comment is noted.**

Make them easier to build!

» **Thank you for your comment. The comment is noted.**

Mixed income neighborhoods are important for the social well-being of the city.

» **Thank you for your comment. The comment is noted.**

Single family zoning is incompatible with an inclusive, affordable city.

» **Thank you for your comment. The comment is noted.**

Rabatin, George

All recent changes have made things worse. Seriously consider option 1 and stop the mess you've already created with allowing all this additional density.

» **Thank you for your comment. The comment is noted.**

Alternative 1

» **Thank you for your comment. The comment is noted.**

Alternative 3

» **Thank you for your comment. The comment is noted.**

Alternative 3. A large portion of the big increases have been caused by levy

- » **Thank you for your comment. The comment is noted.**

Randall, Chris

Alternative 2 seems like the most effective plan. I would like to see this put into action to maximize the housing availability in Seattle.

- » **Thank you for your comment. The comment is noted.**

Ranieri, Katherine

Number of ADUs: prefer alternate 3, Parking: prefer no parking required, Max SF: pref alt 3, Max Height: prefer alt 3, lot coverage: prefer alt 2/3, roof features: prefer allowed, dadu entrances: pref alt 2/3, max household: prefer alt 2, MHA: prefer alt 2, predevelopment: prefer alt 2, FAR: alt 2,

- » **Thank you for your comment. The comment is noted.**

looks great

- » **Thank you for your comment. The comment is noted.**

Ray-Keil, John

I'm in favor of Alternative 2, but would like to see financial support new plumbing lines required for dadu.

- » **Capacity charges are levied by King County; the City does not have authority to waive those fees. King County has two studies underway that may lead to changes to the capacity charge, including charges for a new ADU. See kingcounty.gov/services/environment/wastewater/capacity-charge/review-studies.aspx for more information. Please also see the frequent comment response regarding King County Sewage Treatment Capacity Charges.**

Alternative 2 is much better than current. I'd like to see backyard coverage ratio changed to 60% regardless of height of dadu.

- » **Thank you for your comment. The comment is noted.**

I'm in favor of Alternative 2, but would like to see existing duplexes keep both units, as well as add both an adu and dadu for a total of 4 living spaces.

- » **The study area for the EIS includes land zoned single-family outside existing urban villages and urban village expansion areas studied in the Mandatory Housing Affordability EIS. Please see Exhibit 2-1 in Chapter 2, Alternatives, for a map of the study area. A duplex is not a permitted use in single-family zones. An existing duplex would be considered a nonconforming use. Adding an ADU to a nonconforming use might be possible but would require review by the Seattle Department of Construction and Inspections to determine that the existing duplex is legally nonconforming.**

Rearick, Whitney

Do not apply a Mandatory Housing Affordability contribution to ADU and DADU construction. Many existing ADUs are rented well below market. Permitting and construction costs are already high

enough. Adding more costs would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

Streamline permitting by dedicating reviewers to ADU/ DADU projects. With dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months.

Allow the most flexibility possible when creating accessory dwelling units. Consider allowing owners to make a mix of attached and detached ADUs or DADUs.

Eliminate the owner occupancy requirement. We don't require owners to live on site of other rentals, why require it of ADUs?

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative does not include an affordable housing incentive or requirement. Please also see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

Increase the allowed gross floor area for detached accessory dwelling units to 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to the inclusion of more much-needed two-bedroom (or larger) dwellings for larger Seattle households.

Raise the maximum number of residents on a single lot to 12 - we could easily support a cooperative of 3-four-person households on a typical 5000 sf lot.

- » **Thank you for your comment. The comment is noted.**

Eliminate minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allowed within the zone.

- » **Currently, there is no minimum lot size for an AADU. The Preferred Alternative includes reducing the minimum size required for a lot with a DADU from 4,000 square feet to 3,200 square feet.**

I support of the ADU/DADU options outlined in the draft Environmental Impact Statement that enable the most housing to be built for the lowest cost. Any policies that increase housing density and diversity within Seattle city limits will reduce the pressure on our transportation systems and on the environment. In the fact of climate change, reducing our impact as much as we can, and quickly, is especially important.

- » **Thank you for your comment. The comment is noted.**

Eliminate the parking requirement for ADUs. More and more people are successfully car-free in Seattle, and this trend will continue. Already many homes "" both old and new construction - in Seattle have no on-site parking. It's working. The neighborhoods where on-street parking is the norm are still just as in demand as areas where there's plenty of off-street parking.

- » **Thank you for your comment. The comment is noted.**

Keep costs low so that more people can afford to build more units.

- » **Thank you for your comment. The comment is noted.**

Reiner, Cathy

Allowing ADUs and MIL is the best way to add housing AND to make it more affordable for people to afford to buy houses.

- » **Thank you for your comment. The comment is noted.**

Many of our neighborhoods have big lots and plenty of room for ADUs

» **Thank you for your comment. The comment is noted.**

So many houses have more space than needed, and could affordably and relatively easily be turned into a duplex, so many big seattle yards have room for backyard cottages -- allow tiny houses in backyards!!

» **Thank you for your comment. The comment is noted.**

Rempfer, Jean

Keep the eight person limit, neighborhoods stay basically the same

» **Thank you for your comment. The comment is noted.**

I vote for alternative 2 no owner occupancy needed, alternative 3, allow 2 AADU's

» **Thank you for your comment. The comment is noted.**

Please allow 2 AADU's per dwelling and allow the owner to live elsewhere

» **Thank you for your comment. The comment is noted.**

No change, do 2 AADUS, no owner occupancy, building looks exactly the same

» **Thank you for your comment. The comment is noted.**

Enough space where we are (adjacent to Salmon Bay Park) that strangers park here all the time, there's a guy out there right now living in his long trailer attached to his huge truck right outside. Allow 2 AADU'S, no owner occupancy and I can get him in here! We are elderly, we keep rent down, have low income person in our existing AADU right now, sad to see someone on the street, even if he does have a trailer. We were homeless once, by the grace of God got this place. Please allow us to share with as many as we can. Usually, a single man on s fixed income, usually 1 senior citizen. Also, please hurry with your decision. People are suffering, p.s. Our tenants are good, quiet people who are definite asset to our neighborhood, but if someone else got noisy tenants there are already safeguards against nuisance.

» **Thank you for your comment. The comment is noted.**

I just pay all utilities for all, although the AADU has separate meter, this way tenant has to write only one check and no worries, tenant says he feels lucky he found this place. We are trying hard for him, I think homeowners are more human and compassionate with their tenants, better place to live than disinterested owners of multiple apt units or condos. We care. We even love his cats, they have own yard (we partitioned off yard) natural setting by the park. We would similarly partition off our south side for extra AADU, charge low rent, help someone. If we could move out, a third person or family could have the middle. All would have separate entries, yards, and a home feeling, not some condo with only a deck to experience the weather on, with a non-caring owner. If our tenants need something we get it NOW, we just want to give people a chance at house-like structure with yard where they can grow garden and have their pets and also their privacy, with private entries and yards, you know like a real house.

» **Thank you for your comment. The comment is noted.**

This would make a lot if cheaper housing in residential areas with no changes to building or appearance of surrounding lawns, yards, keeping the "homestead" style, no condos.

» **Thank you for your comment. The comment is noted.**

Resident-West-Seattle-Sunrise-heights,

While public transportation is available, it is less widely used and most residents do own vehicles. Parking is already difficult in most neighborhoods without off street parking. Not requiring off street parking for ADU's would add exponentially to the street parking density would be disastrous.

» **Thank you for your comment. The comment is noted.**

Alternative 1 is preferred by most home-owners. Alternative 2 would ONLY be preferred by developers who don't have to actually live in the neighborhoods they destroy.

» **Thank you for your comment. The comment is noted.**

The most important aspect of these 3 alternatives is the requirement that the owner must live on the property- This is critical to keep speculative developers from buying properties and developing them in the cheapest means possible without regards to aesthetics or quality of life issues for the neighborhood, which would greatly erode the quality of life for the actual homeowners who live there, as well as the renters. It would discourage neighborhood involvement by residents as they would be primarily transient and not vested in the neighborhood.

The second most important component is that on site parking be provided. While public transportation is available, it is less widely used and most residents do own vehicles. Parking is already difficult in most neighborhoods without off street parking. Not requiring off street parking for ADU's would add exponentially to the street parking density would be disastrous.

Alternative 1 is obviously preferred by the vast majority of SF home owners. If the City is not going to honor their wish to go with Alternative 1, please adopt option 3 because: 1) it requires homeowners to live on the property and 2) it requires off street parking.

A hidden negative aspect of Alternative 2, is that it would result in speculative development, so the neighborhoods most affected would be the cheapest neighborhoods, thereby having the greatest negative affect on the poorest segment of homeowners. Developers won't be targeting Queen Anne, they will be targeting Delridge and MLK, which would by default make it a racially biased system.

» **Please refer to Section 4.1, Housing and Socioeconomics, and Appendix A for a discussion of the potential effects on housing economics.**

The most important aspect of these 3 alternatives is the requirement that the owner must live on the property- This is critical to keep speculative developers from buying properties and developing them in the cheapest means possible without regards to aesthetics or quality of life issues for the neighborhood, which would greatly erode the quality of life for the actual homeowners who live there, as well as the renters. It would discourage neighborhood involvement by residents as they would be primarily transient and not vested in the neighborhood.

» **Please refer to Section 4.1, Housing and Socioeconomics, and Appendix A for a discussion of the potential effects on housing economics.**

Alternatives 2,3 would increase lot coverage and increase runoff. It would also overburden the utility infrastructure designed and sized for single family neighborhoods

» **Thank you for your comment. Please note that none of the alternatives contemplates changes to the overall lot coverage limit.**

Revello, Katharine

Any kind of increase in density in single family zoning is excellent!

- » **Thank you for your comment. The comment is noted.**

ADUs should be allowed in front yards, or anywhere on the property with enough room. Limiting this to the backyard doesn't do anything but influence aesthetics, it's an arbitrary line to draw.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. DADUs can be located in front of the main house if it is outside of the required front yard. Please see Exhibit 2-6 in Chapter 2, Alternatives, that illustrates required yards in single-family zones.**

Richmond, Lisa

I strongly support Alternative 2. I am a homeowner who wants to add a DADU on our property with an existing ADU, in order to provide short-term rental income and long-term accessible housing options for our family's health and mobility issues. Removing the parking requirement is the single most important step for us to enable construction of a DADU, and is a critical and welcome part of this alternative. Alternative 3 requires MHA participation for the second unit, and that additional fee would make it that much harder for us to make the numbers work to add a DADU.

- » **Thank you for your comment. The comment is noted.**

NOTE this appears to be the incorrect link. But I can just say that I know parking is the thing my neighbors worry the most about. In reality, there is plenty of parking on our street, and the folks that complain about it often have garages full of yard equipment and bikes that they choose not to use for their cars, so I honestly don't share their concern. Removing the parking requirement is the single most important change in this proposal that will allow our family to construct a DADU, and I strongly support Alternative 2.

- » **Thank you for your comment. The comment is noted.**

Again, I support Alternative 2. DADUs and ADUs won't make a significant impact to the appearance of our neighborhood. But I think that having more people living in my neighborhood will significantly increase its liveliness, feeling of safety, and the number of businesses that can be successful nearby.

- » **Thank you for your comment. The comment is noted.**

I support Alternative 2. However, I'm concerned Alternative 2 doesn't do enough to encourage more housing options in single family neighborhoods. Like most people in Seattle, I'm really concerned about the growing affordability crisis that is affecting my neighbors and co-workers. Seattle can't address our housing challenges through the small gesture of making DADUs and ADUs easier to build. Since single family neighborhoods are the bulk of our land use, we need to go further to incorporate a sensitive increase in housing in these areas.

- » **The comment is noted. Please see the frequent comment response regarding housing affordability.**

This proposal has suffered from an unfortunate series of delays. I hope it can now move quickly. Our family has been anxiously waiting for this change so we can build our DADU. Thank you.

- » **Thank you for your comment. The comment is noted.**

From the analysis, it appears Alternative 2 would result in less physical displacement and the most (although still modest) increase in housing alternatives. I support Alternative 2. Encouraging a more vigorous DADU building program could result in even more DADU construction, but costs and financing are the big obstacles. Our family's ability to build a DADU is very much defined by cost and ability to get funding. I would like to see the city tackle the financing issue directly to encourage more DADU and ADU development.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Roberto, Michael

I'm excited for this to finally come into effect!

- » **Thank you for your comment. The comment is noted.**

Robideau, Jason

Eliminate any parking requirements!

- » **Thank you for your comment. The comment is noted.**

I support more housing EVERYWHERE in the city and this proposal is one of the few options we have to positively impact our housing supply on the table. If we are serious about facing the challenges of climate change and housing affordability, allowing gentle infill in the most populous city in the northwest is an easy yes. I encourage the swift implementation of the alternative 3 of the DIES!

- » **Thank you for your comment. The comment is noted.**

I support Alternative 3, and any alternatives that increase the number and size of units allowed.

- » **Thank you for your comment. The comment is noted.**

Rooney, Mike

It is essential in "Option 2" that there is no requirement for owner occupancy (as written). If there IS an owner occupancy requirement, banks will not use the additional unit(s) as collateral, therefore there will remain no primary funding mechanism for creating these units and the city will get what it currently has. If banks can use a LEGAL, non-owner occupied, two or three unit property as collateral, there are plenty of funding opportunities to create the additional units.

- » **Thank you for your comment. The comment is noted.**

I support Option 2.

- » **Thank you for your comment. The comment is noted.**

Rulifson,, Brian

The Map (on your website introducing the Draft EIS) showing the area with the scope of the EIS has but two items in the Legend and one of them mis-identifies the map color signifying Urban villages. Urban villages are shown in GRAY, whilst the legend identifies them as WHITE.

This kind of level of inattention to detail has been common throughout this process and serves to misinform, misguide, and erode trust in the data presented. If you can't get your FIRST AND MOST BASIC MAP correct, why would a reasonable person to expect the data in the 52MB file to be correct?

- » **Thank you for your comment and pointing out the information missing in the legend. We have updated the map on the website to match the map included in both the Draft and Final EIS (please see Exhibit 2-1 in Chapter 2 Alternatives).**

Salomon, Andres

I prefer Alternative 2. The Owner-Occupancy Requirement is classist and unconstitutional, and needs to simply go away. Parking requirements encourage car ownership and cars are the largest source of carbon emissions for Seattle. Parking requirements also need to go away. Finally, anything we can do to encourage people to build ADUs should be prioritized. ADUs (and especially AADUs) are naturally affordable housing that can keep people from falling into homelessness.

Though it is strange that when it comes to the number of ADUs on lots in single family zones, Alt 3 is more permissive than Alt 2. Alt 3 allows both an AADU and DADU, or 2 AADUs. Alt 2 only allows the former. This is the only instance where I prefer the option from Alternative 3.

- » **Thank you for your comment. The comment is noted.**

We have a housing crisis. Economic displacement is rampant. Homelessness is rampant. There are simply not enough homes. The lack of supply drives up rent, and results in people being thrown out onto the street. Are you serious with this "Aesthetics" nonsense?

- » **Thank you for your comment. The comment is noted.**

Savel, Shirley

Hi my name is Shirley and in 2008 we were fortunately to move into a small 2 bedroom DADU our landlady built on her property in southeast Seattle. At the time we were 3 and didn't need a lot of space and it worked out well for our family for 5 years until we had another child and more space was needed but we would have gladly stayed in the small until. We had a small vegetable garden and it was really nice. Later on I found out this was a pilot project and haven't seen more of these units built as other people find DADU and ADU dwellings difficult to build due to the way in which the city regulates them. I am asking that you allow more diverse dwellings so families can choose to live in these space. Not everyone wants to live in a huge house. Compared to other places we rented this was the most space and energy efficient house we have ever lived in. Please continue to make it easier for people to choose to build these and provide more housing choices.

- » **Thank you for your comment. The comment is noted.**

Scheer, Gabriel

Get rid of parking minimums. Start charging for curb cuts/access to private driveways. Implement paid on-street parking city-wide. If we're serious about achieving climate goals, congestion reduction, and

equity, its time to significantly change modesplit. Pour the money that can be attained above into supporting alternatives to auto-based mobility.

- » **Thank you for your comment. The comment is noted.**

Love it. More please.

- » **Thank you for your comment. The comment is noted.**

This is a great idea. I strongly support this and more such efforts to remove barriers to dramatically increasing the density of Seattle housing as well as the overall number of units. We should significantly reduce the portion of the city zoned single family, and add as much density & new housing, particularly multi-unit and multi-bedroom (to support families) housing.

- » **Thank you for your comment. The comment is noted.**

Changes will result. The flow of people into Seattle isn't stopping, and barely slowing. Climate change will exacerbate that. Time to dramatically increase building.

- » **Please see the frequent comment response concerning the positive impacts of the proposal.**

Schletty, Mark

Even if alt. #2 or 3 are chosen, the no off street parking changes are completely unacceptable. People have cars, like it or not, and not providing off street parking is a direct assault on the neighbors livability.

- » **Thank you for your comment. The comment is noted.**

Alternate 1 is the only acceptable alternative. The others are a formula for destroying Seattle's livability.

- » **Thank you for your comment. The comment is noted.**

The city's infrastructure is already insufficient to handle even alt. #1, and totally unable to handle alt. #2 and 3. Kill this whole program. It is a total giveaway to developers at the expense of Seattle's citizens.

- » **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

Schlosser, John

Seattle is a city of hills and valleys. This topography should be taken into account when setting maximum DADU heights. For example, the main house may be low, with lot sloping up to the rear where the DADU is built. In these cases, no one wants the DADU to be nearly as tall as the main house. Please consider height rules that take these topographic conditions into account.

- » **Please see Section 4.3, Aesthetics, for graphics and text added related to development on a sloping site.**

As described in the EIS (Exhibit 4.5-3), the proposed ADU rule changes would, compared to current regs, add only 144 units/yr (Alternative 2) or 121 units/yr (Alternative 3). This is miniscule, in context. There are 100-150 units in one good sized apt building!

I do not oppose reasonable changes in ADU regs, but we should make clear to all that ADU's will not have much impact on housing supply & affordability. They will add very few units and the rents will likely be HIGHER than many apartments.

The most critical and sensitive element of Alternative 2 is to eliminate the Owner-occupancy requirement. Please do not do this. This idea is promoted by small landlords, who will inevitably cut up homes & build DADU's to maximize the number of units. Note that the bulk of the added units under Alternative 2 (and Alt 3) are estimated to be "2-ADU" properties. Consider this from the point of view of the neighbors of such a home: before they had a family next door, but after Alt 2, they have three units next door, including possibly a new 20-25' structure (DADU) covering the backyard.

Are these impacts worth it, when the over increase in housing supply is miniscule (see above)?

» **Thank you for your comment. The comment is noted.**

Please consider a software application to help owners judge the suitability of lots for DADU's. Few are, because they already are at 35% lot coverage, or don't have the side yard space, or don't have the parking space, or have space but it is far (ie "expensive") from the side sewer.

The company "Cover" in LA, for example, seems to offer this:

<https://la.curbed.com/2018/3/9/17101336/prefab-los-angeles-adu-back-house>

» **Please see Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and support homeowners interested in developing an ADU.**

The EIS did not cover development costs sufficiently. DADU's I see built are expensive projects. Thus they become "luxury" housing, rather than a low-moderate income solution.

For example, I did not note cost-related discussion of \$20,000 sewer-connection fees charged by our sewer utility for new DADU connections. Regardless of zoning/land use rule changes, these costs, and similar, will deter owners/developers from building even the limited number of DADU's that are projected.

» **Independent of the Land Use Code changes evaluated in this EIS, the City is exploring options to lower the upfront costs associated with ADU production. See Chapter 1, Summary, and the updated analysis in Section 4.1, Housing and Socioeconomics, for additional details.**

1. The largest impact of Alt 2 and Alt 3 would be to add more "2 ADU" properties--with associated off-street parking for at least 1 unit. Where there is no alley, this will result in new curb cuts--the bane of pedestrians, strollers, wheelchairs and other sidewalk users. Please consider restricting curb cuts as part of any ADU changes.

2. Despite access to transit etc, people in units without designated parking will still own cars--absent any deterrent. When changing rules to increase the # of units without parking, please consider requiring leases ask renters to agree to not have a car.

» **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative would remove the off-street parking requirement for ADUs.**

Schueler, Dashel

Thanks for the opportunity to provide feedback on this plan. I own a home in Mount Baker neighborhood, just outside the Mount Baker urban village, in District 2. I live there with my wife, two young daughters, and a roommate. I'm writing to indicate my very strong support for the plan to expand the opportunity to build ADUs throughout the city. I want more people to be able to afford to live in my wonderful neighborhood, and I see density as crucial to fighting climate change.

I also support the recommendations of MOAR, including:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.
10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.
11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification.

Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Schuldt, Dave

We really need more housing and ADUs are a small part of the solution. The city should move forward with this ASAP. An ADU would be a nice boost to retirement income and will allow some seniors to stay in Seattle. All the people moving here have to go somewhere.

- » **Thank you for your comment. The comment is noted.**

Schumann, Frank

I see no reason why we need to allow DADU's to destroy our traditional single-family neighborhoods! The Seattle Times just today had an article titled "Seattle renters score big as landlords dangle freebies to fill empty apartments". There's now a glut of apartments:

"At newly opened properties, 40 percent of all brand-new units across the region are sitting empty "" that works out to about 5,000 units that have never been lived in, according to Apartment Insights/RealData. About 10,000 additional units across King and Snohomish counties are sitting empty at buildings that aren't brand new, largely because of regular turnover."

No DADU's!!

- » **Thank you for your comment. The comment is noted.**

Parking's impossible anywhere now. All apartments should be required to have parking for their tenants. You want us old folks to ride bike-shares downtown to see the doctors. Wait til you're 80!!

- » **Thank you for your comment. The comment is noted.**

Schwab, Erik

Please support the most flexible options for increasing the number of new Accessory Dwelling Units.

I am concerned that Seattle is faced with a housing crisis, increasingly unaffordable housing, a long history of codified inequity through land use planning, and inaction on climate change.

The recent Draft EIS has concluded that the environmental impacts of reducing regulation of Accessory Dwelling Units are non-significant. The benefits of ADUs could be widespread, if we select options that maximize the production of this very adaptable and accessible form of dwelling.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots

fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation while maintaining high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Scrivner, Kim

I support the city easing restrictions on both AADU's and DADU's. I personally lived on a property where the house had two units (I assume these would qualify as AADU's) and I lived in the DADU in the backyard. This was a wonderful living situation as each unit has some semblance of privacy, we all

enjoyed different areas of the yard and we able to enjoy neighborhood living space, access to a yard and the outside without being crammed in a building and I was even able to garden. I support expanding the square footage maximums as well as height limits but the height limits should be carefully considered due to the impact of privacy and light on neighbors. DADU's should not be allowed taller than two-stories plus dormers. Otherwise, this can have a significant impact on neighboring properties, particularly in single family or RSL neighborhoods. I do not believe DADU's should be allowed to be three stories.

I also support DADU entrances facing rear or side lot-lines. The cottage I lived in faced the rear lot line that had high hedges. This provided me much desired privacy from the main house and the shared yard. It also provided me with a tiny oasis which was a blessing for living in such a small living space.

Regarding owner occupancy, it is ridiculous to require where an owner of a property actually lives. These spaces provide much needed housing and do not require owners to live on-site. I've lived in both a DADU with no owner on site and an AADU with the owner on-site. Both functioned just fine.

» **Thank you for your comment. The comment is noted.**

Shafchuk, John

I vote for Alternative 2

» **Thank you for your comment. The comment is noted.**

Shoegnome Architects,

Option 2 is by far the best option. Option 3 is crazy. Limited FAR to .5 is anti-growth and the exact opposite of what Seattle must be doing. Only Option 2 increases options and encourages more houses.

» **Thank you for your comment. The comment is noted.**

More density where ever possible.

» **Thank you for your comment. The comment is noted.**

Siepak, George

Seattle's strength is in its neighborhoods. This is a sell out to developers.

» **Thank you for your comment. The comment is noted.**

Doing all this without parking is a terrible idea. Without adequate parking the streets will be even more crowded. Developers must provide adequate parking.

» **Thank you for your comment. The comment is noted.**

Smyth, Don

Prefer alternative 3. Best choice to increase housing density in the short term.

» **Thank you for your comment. The comment is noted.**

Reduce or eliminate the cost of the impact analysis -- too burdensome.

» **Thank you for your comment. The comment is noted.**

Stahre, Grace

I do not have the time to address each item individually. I am a homeowner in the Central District and we are interested in adding a DADU to our property. Here are the items I do and do not support.

There should be NO PARKING REQUIREMENT because requiring parking for ADUs that means we're privileging space for cars over housing for people. It is likely that personal cars are going to be on the decline as automated cars take to the road anyway.

Lots should be allowed 2 ADU's and a DADU; we want to encourage the subdivision of existing large houses, especially for empty-nesters.

I do NOT believe in removing the owner-occupancy requirement because I have seen the results of AirBnb and the catastrophic loss of neighborhood feel due to some many absent owners on our block. There are people waiting to capitalize on this and will make properties into squashed, money making machines. There isn't a shortage of owners who CAN afford to own. If the situation were different, then the other option might be amenable. I do believe that erasing the owner occupation requirement would unleash a race to destroy the neighborhood, and even more deadbeat landlords. I don't believe this world needs to be accommodating of people who accumulate property. That is why we are in the mess that we are.

Incentivize affordable rentals by eliminating development charges for units when owners commit to holding them as rentals affordable to people making under 60% AMI for 15 years - but only if you are ACTUALLY going to enforce this.

Incentivize green building standards like passivhaus and "living buildings", by eliminating development charges on any units built to those standards. But only if you are going to enforce it.

I don't believe in lowering the lot square footage, as we already are suffering from a lack of light and diminishing open space that has been proven to have a negative psychological effect on people.

I do believe that the size of a DADU should be allowed up to 1200 sq feet, not including a garage. Being able to build a reasonable 2 bedroom home that is not just a "starter" makes more sense.

» **Thank you for your comment. The comment is noted.**

Stair, Sherri

Give incentives for trees and rain gardens but do not require them.

» **Thank you for your comment. The comment is noted.**

Do not require parking spots. Build out public transit and sidewalks.

» **Thank you for your comment. The comment is noted.**

A balance between affordability, tree canopy, and some minimum aesthetics is a common sense approach. I don't buy what can be an elitist and racist 'neighborhood character' line on single family

dwellings in the city. We can have a reasonable balance of trees, house-sharing, ADUs, and a place where non-rich elite can simply live.

» **Thank you for your comment. The comment is noted.**

ADUs will help elderly and low income owners and long-term renters to stay in single family homes via the cost-sharing of an ADU on the property. As a senior who downsized from a large single family home, I was unable to find affordable housing and would love to find a ADU in the city so that I don't have to leave my home town and support system. Support communities by offering incentives for long-term rentals. YES to getting ADUs available ASAP.

» **Thank you for your comment. The comment is noted.**

Wallingford, Ballard, Wedgewood, and other close-in neighborhoods should be zoned for ADUs. Otherwise they will either become rich white ghettos or apodments taking over the neighborhoods. ADUs allow a neighborhood character and community.

» **Thank you for your comment. The comment is noted.**

Suryan, Sara

Based on this analysis, I still agree that Alternative 2 is the most comprehensive and sensible plan.

» **Thank you for your comment. The comment is noted.**

I fully support Alternative 2 as laid out in the above chapter.

» **Thank you for your comment. The comment is noted.**

I support all outcomes that will increase the number of affordable housing options, especially in high cost areas and zones that are currently single family use only. We need more affordable housing.

» **Thank you for your comment. The comment is noted.**

The visual character of single family zones is a benign point when you understand that we need more affordable housing.

» **Thank you for your comment. The comment is noted.**

We need to increase public transit options if we are going to increase affordable housing. Most people who are income or housing insecure can not afford a car, and need to utilize public transit.

» **Thank you for your comment. The comment is noted.**

We should work harder to decrease the areas designated as single family homes, and increase the residential urban hubs and multi family areas

» **Thank you for your comment. The comment is noted.**

Szeles, Jean

This needs to happen sooner than later. This is a viable option for so many of us if the lot size is reduced and some of the restrictions are lifted and minimized. Thank you

» **Thank you for your comment. The comment is noted.**

Parking can be an issue. However, Columbia City and so many other places are accessible because of the light rail, buses, UBER, etc. I don't think parking should be mandatory.

» **Thank you for your comment. The comment is noted.**

We need to reduce barriers to make housing options available and affordable for so many folks in Seattle. Reducing the mandatory lot size and minimizing, if not eliminating, restrictions as to years of owner occupancy, parking, etc, will help make building ADU'S a possibility for those of us that are interested. Seattle is growing and changing and we need to make housing options grow and change as well.

» **Thank you for your comment. The comment is noted.**

Again, Seattle's growth and how costly it is for many to live here could result in more people leaving if housing options do not vary and become more affordable for all.

» **Thank you for your comment. The comment is noted.**

Housing is a critical need and something everyone deserves to have...not be entitled to have but deserves to have. The number of homeless and the lack of affordable housing is at a critical stage and has been for years. There need to be more options.

» **Thank you for your comment. The comment is noted.**

Yes, aesthetics in the neighborhoods would change. This does not mean they have to change for the worse. All the condos and townhouses look the same anyhow. Some backyard cottages and ADU's are very sweet and artsy adding appeal to the neighborhoods.

» **Thank you for your comment. The comment is noted.**

Thompson, Schuyler

My name is Schuyler Thompson. I live in district 5. I want more housing in Seattle, because the city is experincing a massive economic boom, and excluding people who want to move here but can't afford it due to the housing shortage isn't fair. We talk a lot about reducing inequality, and liberalizing zoning is the number one thing local governments can do to help.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters

(27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Thomson, Alexander

I believe that Alt 2 best fits the goals of the city, to provide affordable housing for all.

» **Thank you for your comment. The comment is noted.**

The density increases in SF zones that result in Alt 2 changes are minimal and not a large impact.

» **Thank you for your comment. The comment is noted.**

Transit Riders Union,

The housing situation in Seattle has reached a crisis and we need all kinds of solutions. This plan won't solve all our problems but it will help both the home owner and renter.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
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available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

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- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Trumm, Doug

We should strive to generate the most housing, which gives Alternative 2 the edge. That said, expanding the mandatory affordability program has its own attraction as does having two AADUs per lot. We should mix and match between Alternatives 2 and 3 to generate the most units and affordability. We should not have an owner-occupancy requirement because limit housing options.

- » **Thank you for your comment. The comment is noted.**

I think rowhouses are very aesthetically attractive and we should encourage them rather than encouraging parking eating up frontage.

- » **Thank you for your comment. The comment is noted.**

MHA should apply truly citywide. I don't think ADUs should face the fee if single family homes do not, but it does seem a shame that teardowns creating million-dollar homes generate no MHA fees. Mansions should contribute to affordability too.

- » **Thank you for your comment. The comment is noted.**

We should consider using a mansion ban like Portland is considering to driving production away from more million dollar mansions and toward moderately-priced housing.

- » **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative includes an FAR limit but exempts floor area included in any ADU to incentivize ADU production.**

Please pass ADU reform as soon as possible and help more working class people stay in Seattle.

- » **Thank you for your comment. The comment is noted.**

No parking requirements. We are facing a climate change crisis and requiring car ownership is regressive and harmful.

- » **Thank you for your comment. The comment is noted.**

Trumm, Doug, The Urbanist

We do not need parking requirements, and including them could block projects. Most neighborhoods have curb parking that is not beyond the 85% threshold of use. The only rationale I see for including them is appeasing opponents.

- » **Thank you for your comment. The comment is noted.**

Next stop fourplexes everywhere. I think MHA would apply to ADUs because I think the next step is to make something like fourplexes or even LR2 the base zoning everywhere. If Seattle wants to continue to be a climate action leader it should push growth to the fringe of the region. If Seattle wants to continue to be an economic engine, it should build housing to support that without massive economic displacement. Single-family zoning should be a relic of Seattle history, much like racial covenants and redlining.

- » **The comment is noted. The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code and are outside the scope of this EIS.**

ADUs would be very compatible with single-family zones. They are not intrusive and in fact returns Seattle's zoning closer to its original level.

- » **Thank you for your comment. The comment is noted.**

I like a combination of Alternatives 2 and 3 guided by the principle of getting the most homes build but also implement MHA to maximize affordability but with streamlined permitted and reduced fees to not stifle development. The status quo is not good since it makes ADUs very hard to build in much of the city.

- » **Thank you for your comment. The comment is noted.**

The ADU reforms will bring a modest increase in population growth and should in no way "break the camel's back" when it comes to utilities. Let's not let this red herring block this needed reform.

- » **Thank you for your comment. The comment is noted.**

We need to get more affordable housing out of single-family zones. We should make it easy to build ADUs.

- » **Thank you for your comment. The comment is noted.**

We should not let aesthetics stifle housing production. Just need some base minimum standards.

- » **Thank you for your comment. The comment is noted.**

Tucker, Jeffrey

More ADUs would improve neighborhoods aesthetically. It would create more things to look at, and permit more people to live in Seattle's most aesthetically pleasing neighborhoods.

- » **Thank you for your comment. The comment is noted.**

It would be good to increase the building density, population density, and scale in the affected neighborhoods, such as mine. More homes means lower housing costs and more varied options for homebuyers. More people means more neighbors to talk to, share recipes with, help out with household tasks, babysit, more kids for my son to befriend, more community, more taxpayers, more business patrons.

- » **Thank you for your comment. The comment is noted.**

My name is Jeffrey Tucker. I live in District 1, with my wife and soon-to-be-born son. I support more housing because Seattle is in the midst of a historic housing shortage. I think Western Washington, and Seattle in particular, is one of the most beautiful, temperate, lovely places in the world to live, and I want more people to have the opportunity to live here. My house is on a split lot, which is the only reason we

could afford to buy it. The changes to ADU regulations proposed in Alternative 1 are a good start but do not go far enough. We have plenty of land, and many willing homeowners and would-be buyers, and builders standing by, all happy to build more homes on the land we have -- permitting them to do so is a small but helpful step in the right direction to ameliorate our housing shortage.

I would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Treating "reduced availability of on-street parking" as an environmental impact is practically Orwellian. Public policy that subsidizes abundant, cheap car ownership is obviously bad for the environment. If this policy change makes parking harder, that will be good for the environment

» **Thank you for your comment. The comment is noted.**

Unterschute, Keith

Pre-approved Designs: I would suggest that you look at designs done by a local architect named Ross Chapin at <https://rosschapin.com/>. He has quite a variety of small cottage designs such as the Lissie Cottage, Lisette Cottage and Gilann Cottage.

» **Thank you for your comment. The comment is noted.**

Van, Paul

My name is Paul Van Bodegom and my household is made up of two adults working full time

I live in District 4. I want more housing because given recent and projected job growth there is a lack of housing in the area, especially round transit and other public amenities.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.
10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.
11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.
 - » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

van, Rhys

lose parking requirements, they're an undue burden and prevent many otherwise usable lots from adding ADUs.

- » **Thank you for your comment. The comment is noted.**

Access to light, retention of trees, and promotion of new trees and vegetation ought to be the only aesthetic concerns the city dictates.

- » **Please see the frequent comment response concerning impacts on tree canopy.**

more neighborhood mixed use zones, fewer exclusive SF zones

- » **Thank you for your comment. The comment is noted.**

Given the current housing affordability crisis the city should be doing everything possible to reduce barriers to construction of new housing. This is especially true of housing outside of dense urban centers. It's not only unjust to only allow new housing in dense, neighborhood villages, we need more home types in between apartments and single family homes. Townhomes, rowhouses, ADU's, etc.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

Vander, Ann

The requirement to build off-street parking spaces comes at the expense of the greenery surrounding our dwellings. Trees, gardens, shrubs, lawns are eliminated with a resulting detriment to our physical and mental health. I favor Alternative 2.

» **Thank you for your comment. The comment is noted.**

I favor Alternative 2 which is most consistent with an affordable Seattle where teachers and other human service providers can own houses within the city limits.

» **Thank you for your comment. The comment is noted.**

I favor Alternative 2, that will stop demolition of modest houses and building oversized houses in our residential neighborhoods.

» **Thank you for your comment. The comment is noted.**

I favor Alternative 2.

» **Thank you for your comment. The comment is noted.**

Varley, Matthew

It is unfortunate that we are not considering the reclamation of on-street parking as more space for housing or public transit. The public roadway should not be used for the storage of private property.

» **Thank you for your comment. The comment is noted.**

Doing nothing will have the worst impact on the environment of all options.

» **The comment is noted. Please see the frequent comment response concerning the positive impacts of the proposal.**

The economics are a tiny step towards alleviating the housing crisis, but it is nowhere near enough.

» **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

The proposed land use does not create enough density given the lack of housing in Seattle and the environmental costs of building even more suburbs. More please.

» **Thank you for your comment. The comment is noted.**

Doing nothing will create the worst environmental impact of all the alternatives. Doing nothing will force new construction further outside the city with corresponding increases in car traffic. The environmental impact of doing nothing far outweighs the impact of changing the rules.

» **Thank you for your comment. The comment is noted.**

Aesthetics won't be impacted, but even if they were, any aesthetic impacts pale in comparison to our housing crisis.

» **Thank you for your comment. The comment is noted.**

Vinal, Ariel

Compatible design is an important factor in maintaining the character of our older existing neighborhoods.

» **Thank you for your comment. The comment is noted.**

I think it would be unfortunate to lose the nature of our single-family zones. The existing (Alternative 1) allows for significant development in these neighborhoods. I do feel it is important that there is a resident owner in occupancy at least 6mos. of the year to have a 'hands on' view of maintenance.

» **Thank you for your comment. The comment is noted.**

I feel there should be a restriction high density zones to areas where adequate public transportation exists.

» **Thank you for your comment. The comment is noted.**

I think it is critically important to require off street parking for at least one vehicle when adding additional units. Our neighborhood streets are already congestion with existing vehicles. Many are reduced to single lane which hinder traffic and pose a safety concern for children and pedestrians in general.

» **Thank you for your comment. The comment is noted.**

Vrignaud, Andre

I strongly support Alternative 2, as it excludes garage space from total size consideration. This makes it much easier to expand an existing garage and create a useable DADU above it. Alternative 3 is also better than the current status (Alternative 1/no change), but not as strong as Alternative 2 in my opinion.

» **Thank you for your comment. The comment is noted.**

Vrsek, Jamie

While I am super excited about the progress that's being made and am absolutely in favor of 99% of the proposed alternatives, I am DEEPLY concerned about the maximum gross floor area restrictions proposed in Alternative 3. Including garages and storage areas in gross floor area calculations for DADUs effectively eliminates the option to build a DADU for many, if not most homeowners in Seattle. This factor is a main reason why more DADUs have not been built under the current rules.

Under Alternative 3, in order to add DADU living space, whether rent \$-generating or not, homeowners would need to eliminate the lot's garage space in order to build the DADU in the first place. Eliminating garage parking will obviously increase the demand for on-street parking to beyond capacity for most neighborhoods, and does not make sense. Especially while adding occupants to the lot via the DADU! Garage space should absolutely be excluded from gross floor area. Alternative 2 gets this aspect right.

Obviously, any homeowner taking on the cost of building a DADU wants to maximize its use and provide desirable, livable, (and hopefully affordable) housing for the DADU occupants. While some garage space may be maintained by building a DADU on top of garage at 500sqft or less, this option is not desirable, practical, or economical, and will certainly be under-utilized. My aging parents do not want to live in space less than 500 sqft, nor would a small family. People who most need an affordable option (i.e., those on a fixed income, or families with children) are generally in need of more than a micro-studio sized apartment. 1000 sqft of living space is much more desirable, versatile (2 bedrooms are possible), and

economically viable to build. DADU on top of a garage is the MOST desired and reasonably attainable (affordable to build, easier to plan and design) form of DADU for homeowners, so why on earth would we effectively eliminate that option? The other aspects of Alternative 3 make good sense, but this one is such a huge miss that I seriously hope you'll reconsider. The cost of adding "affordability" by way of DADUs falls on the homeowners, so please don't make it impractical. As it stands, Alternative 2 is the better option if you want to see change happen.

» **Thank you for your comment. The comment is noted.**

Wadsworth, Tim

I own a home in North Seattle but have been living out of state due to my work for the last few years. I rent out my house and the backyard cottage on the property lies vacant. This is both a financial burden to me and a significant waste of house stock in Seattle. While I support most of the issues promoted by MOAR as discussed above, I want to voice my especially strong support for removing the owner occupancy requirement. That said, I encourage the final EIS to include:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allowed by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing

elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Wagner, Annie

Alternative 2 produces the most new housing, which should be the number 1 priority.

- » **Thank you for your comment. The comment is noted.**

I strongly prefer Alternative 2.

- » **Thank you for your comment. The comment is noted.**

Wallace, Danielle

I support financing support for low income households, especially in communities of color, to have access to building ADUs so that there are more affordable housing options in areas of high displacement risk.

- » **Thank you for your comment. The comment is noted.**

I support this

- » **Thank you for your comment. The comment is noted.**

Additional parking should not be required.

- » **Thank you for your comment. The comment is noted.**

Warburton, Neil

Prefer EIS Alternative 2

- » **Thank you for your comment. The comment is noted.**

Warren, Ruth

ADU and DADU will provide urgently needed affordable housing and help homeowners on fixed income stay in their homes with extra rental income. I support either Alternative 2 (best) or Alternative 3.

- » **Thank you for your comment. The comment is noted.**

Wedekind, Blake

Building ADUs allows people without access to many public goods to integrate into neighborhoods with better schools and economic opportunities, without having to spend their whole paycheck on rent. This is how we bridge the gap between limited economic opportunities for the disadvantaged. We need more ADUs.

» **Thank you for your comment. The comment is noted.**

Increase density! There comes a time when the character of a neighborhood loses its value - and that's when no one can afford to live there.

» **Thank you for your comment. The comment is noted.**

YES. Please remove barriers to building ADUs. ADUs are one of the best policy tools we have to address our affordability crisis, and we need to be able to streamline the process of getting them built.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

Wehri, Peter

By their very nature, ADUs are unlikely to have significant impact on aesthetics. They are either within an existing structure or in the backyard and small. The building code itself is far more impactful, as it can be exploited for max lot coverage, tree removal, etc.

» **Thank you for your comment. The comment is noted.**

Overall, if I had to choose, I would choose Alternative 2, with its flaws. See last question.

» **Thank you for your comment. The comment is noted.**

I don't believe land use impacts are significant in any of the proposed changes. Greater density is a necessity, so the impact is mostly positive. The exception may be on the tree canopy. As a real estate investor/realtor who moved here 10 years ago, my impression is that the tree canopy is not really well protected, and my fellow investors generally cut first and apologize later. Increasing DADUs can only add pressure to the canopy. Also, there is always negative impact on groundwater and stormwater runoff when structures are added.

» **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use, and exceptions added to the Preferred Alternative to preserve trees.**

1. There really is no practical reason to limit the lot size where DADUs can be constructed; the setbacks and other code requirements will keep backyard units within reason, so the minimum size should be dropped. The homeowners with small lots are more likely to need and benefit from a rental or family unit on their property. This is just an old mindset and we should let go of it.

2. As a real estate broker/investor, I am certain the key reason that Seattle is so slow to build backyard cottages is economic, not current regulation, and I don't believe any of these proposals will significantly accelerate production. The economic factors should be foremost. Permitting and fees should be cut dramatically for DADUs; 50% is reasonable, 10% is not. From a business perspective, RE investors are not drooling over any of this, only architects--who do not grasp the economics, but always believe they do--are interested in this issue. Cut the cost and you will get more units.

3. The parking requirement is a possible cost issue, so as in #2 above, it should go. But I am skeptical about it making a large impact. I see no need to require parking, maybe for a 3rd unit, as in Alternative 3.
4. I have no problem with a residency requirement. We RE investors generally increase housing costs, and a house with ADU is not especially attractive in Seattle. Must have 3 units or more to get me interested.
5. What my architect friends have right on is the great value of increasing height limits. It actually does impact cost and feasibility. So absolutely, heights restrictions should be increased.
6. If you want the middle and lower class homeowners to build ADUs, then we must, must, make the permitting faster and less complicated. The average Joe can't be expected to drop \$20k on an architect to marshal things through on such a small project. The permitting struggle is serious for the average homeowner, and will kill many of these projects. Fast track it and give them dedicated all-in-one ADU code specialists.
 - » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

There is likely to be some impact on parking availability, but we appear to have the capacity. My question is whether it will disproportionately effect low income residents? As density increases, public transit must increase as well. The fewer restraints on density near transit hubs the better.

- » **Please see Section 4.1, Housing and Socioeconomics, for discussion of estimated ADU production and number of tear downs by neighborhood profile. The analysis suggests that lower-income neighborhoods will see fewer ADUs built over the 10-year period.**

Weill, Jason

Much of Seattle's single-family housing was built hastily in the mid 20th century in response to previous population booms. We should preserve a small representative sample of historically significant housing while also acknowledging the need for higher-density housing to accommodate the city's shrinking household sizes.

- » **Thank you for your comment. The comment is noted.**

I urge the city to proceed with increased ADU permits pursuant to the findings in this EIS.

- » **Thank you for your comment. The comment is noted.**

I support Alternative 2. Our city will benefit from additional housing units in residential areas. In addition, we should not mandate that more of our city be designated for vehicle storage. We should instead be encouraging residents to think outside of the previous worldview of parking being expected outside one's residence.

- » **Thank you for your comment. The comment is noted.**

Building additional housing units will limit the amount of economic displacement. The choices Seattle has made to reduce residential construction have been far more damaging to the city's accessibility than any ADU project would be.

- » **Thank you for your comment. The comment is noted.**

Seattle's street parking is extremely underpriced with permits selling for as little as \$65 per 2 years in neighborhoods such as Capitol Hill where off-street parking commands thousands of dollars per 1 year. We should not plan for a 21st century where people still insist on parking their personal vehicle right

outside their home for free. If people would like to rent the city's land for vehicle storage, they should pay a fair market price for doing so.

- » **The proposal evaluated in the EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to the Residential Parking Zone (RPZ) program and other on-street parking regulations are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

I agree with the city's assessment that there would be a modest impact to fire, police, and utility services by permitting ADUs in greater numbers than today.

- » **Thank you for your comment. The comment is noted.**

Wheeler, Mattie

I have lived in Seattle my whole life (33years) as a lower end middle class citizen and I want to strongly encourage our city to select Alternative 2 for Land Use Codes with ADU/DADU. DADU have the ability to address many issues the city is facing currently (some of which directly impact me and my family). The largest issue is affordability for residents in the city. By allowing homeowners to rent out both dwelling units or build additionally units on smaller properties increases the supply for folks looking for rentals, decreases the burden of the on current homeowners (particularly mid to low income owners who might have a larger benefit from additional income per month), and allows for historical neighborhoods to maintain their charm.

For me (the youngest in my family), I am the only one out of a family of five who is able to still live within city limits. For my co-workers and friends, many are completely unable to live within the city limits anymore (up until two-three years ago they had lived here for many years) and are now commuting anywhere from an hour or two to still work within the city. This does not help our city strive for our greener goals nor is it possible for families who are even lower income brackets to afford the high cost associated with such travel.

I can go further, however, in short Alternative 2 would make Seattle a more sustainable city moving forward.

- » **Thank you for your comment. The comment is noted.**

Whisner, Jack

Liberally legalized ADU could be good for householders and renters alike; there would be income for the former and housing for the latter; there would be more eyes on the street.

- » **Thank you for your comment. The comment is noted.**

Parking: there should be no parking requirement; the number of vehicles associated with a house is more closely correlated to its bedrooms and not its kitchens; single family houses with several adults may have several vehicles even if it has only one kitchen; if parking is an issue, it is better to price curb space rather than limit ADU.

Height: please allow DADU to be as tall as single family houses. This would allow narrow houses to achieve the same square feet. The impact of a tall DADU is less than that of a tall mega house.

- » **Thank you for your comment. The comment is noted.**

If an area is parked out, and data seems to show little of that, pricing should be used. In the mid-term, please consider revising the RPZ program to have higher rates that would help allocate a scarce common property resource. Could the budget process allow RPZ revenue to be targeted to local transportation projects?

Many single family areas are within easy walking distance of frequent transit service. Bus routes tend to serve corridors and not urban village nodes. Many along the corridor can take advantage of the short waits for service to gain access to the network. Frequent routes will connect with Link or RapidRide.

- » **The proposal evaluated in the EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to the Residential Parking Zone (RPZ) program are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

White, Emily

The key to maintaining our family neighborhoods in terms of neighborliness, housing maintenance and retention of aesthetically coherent architecture is owner-occupancy. Option 3 provides that and will yield almost as many new units (1815 vs 2160) as option 2. Option 3 yields the fewest teardowns vs both option 1 and 2. Option 3 also has a requirement for affordability for a 3rd unit, which is the goal of these proposed changes, while option 2 does not. We must go with option 3.

- » **Thank you for your comment. The comment is noted.**

Very hard to believe that allowing 12 people on a single family lot will not affect parking.

- » **Please see the frequent comment response concerning impacts to parking.**

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- » **Please see the frequent comment response concerning impacts to parking.**

The key to maintaining our family neighborhoods in terms of neighborliness, housing maintenance and retention of aesthetically coherent architecture is owner-occupancy. Option 3 provides that and will yield almost as many new units (1815 vs 2160) as for option 2. Option 3 yields the fewest teardowns vs both option 1 and 2.

- » **Thank you for your comment. The comment is noted.**

Williams, Florence

I am deeply in support of Alternative 2.

- » **Thank you for your comment. The comment is noted.**

I believe that Alternative 2 will lessen the upward pressure on housing costs and will help prevent the displacement that has become epidemic in Seattle.

- » **Thank you for your comment. The comment is noted.**

I am unconcerned about the effects of AADUs and DADUs on parking and transportation.

- » **Thank you for your comment. The comment is noted.**

Windermere Real Estate,

ADUs can offer affordable housing units without substantially altering the existing look and feel of the neighborhood. I would hope that any increases in height and reductions in set backs would be looked at very carefully to avoid backyard cottages looming over neighboring yards.

- » **Please see Section 4.2, Land Use, for a discussion of changes to height and yard requirements.**

I am supportive of MIL and AADUs and DADUs but the idea of having up to 12 unrelated people living on one residential lot is very unappealing. One of the reasons that backyard cottages are so appealing is that it is absolutely in the homeowners best interest to rent to a good neighbor as there is no one closer than the homeowner themselves. It helps families who may be struggling to stay in their home share the burden of their mortgage or retirees who want to keep their home while still doing some travelling (and having a built in property sitter), while helping someone else with a safe affordable housing option. It is the definition of win win. The ability to rent both units (or all three) out individually completely shatters the residential zoning definition. If that is your intent, just change the zoning for all SFR to triplex and be done with it. The city can save a lot of money on monitoring and compliance. In case that was not clear...I absolutely DO NOT support doing away with the requirement of owner occupancy. Thanks for the opportunity to give feedback.

- » **Thank you for your comment. The comment is noted.**

I am supportive of the preapproved plans and streamlined permit process that makes it easier and less expensive for homeowners to build ADUs and increase the number of affordable housing units.

- » **Thank you for your comment. The comment is noted.**

No one can dispute the need for additional lower cost housing.

- » **Thank you for your comment. The comment is noted.**

Please for the love of pete do not remove the need to provide at LEAST one off street parking space. Increasing street parking is making our neighborhood streets extremely narrow. In many cases two cars cannot pass each other. There are areas in west seattle with no sidewalk or curb where multiple cars are parked

in front of homes/in front yards. This is not helpful to maintaining property values.

- » **Please see Chapter 2, Alternatives, for a discussion of off-street parking requirements. All alternatives would continue to require one off-street parking house for a principal dwelling unit in single-family zones.**

Withey, Joe

My name is Joe Withey and I live in West Seattle District 34. I would like more housing to prevent working class people from being priced out of Seattle. I support Alternative 2 because housing options should not be restricted due to parking. My house is close proximity to a bus where a car is not needed and close proximity to grocery stores and other necessities.

- » **Thank you for your comment. The comment is noted.**

Woland, Jake

Alternative 2 is a great direction. Alternative 3 encumbers the process of implementation more with the additional fees - the fact that this is adding stock, likely of an affordable nature should give it credit against paying into other housing affordability goals. Alternative 1 was difficult to make feasible, onsite parking sucks up space that has so much greater value (open space, stormwater mitigation, social space)

» **Thank you for your comment. The comment is noted.**

Alternative 2 is the best encouragement for appropriately adding density to the City

» **Thank you for your comment. The comment is noted.**

Wood, Kyle

I perceive that there are many homeowners in the city who wish to add much-needed housing stock by adding an ADU or DADU to their properties. For many, the outdated, car-centric rule requiring an additional parking space per ADU or DADU is a significant obstacle. Removing this requirement, especially in neighborhoods well-served by ample public-transit options, will go a long way toward encouraging the construction of many additional affordable housing options in our city.

» **Thank you for your comment. The comment is noted.**

I support Alternative 2. This alternative would encourage greater housing density without requiring a change to the single-family zoning that so many Seattle residents love. The out-dated rule requiring an additional parking space per ADU or DADU is a significant obstacle for many homeowners who wish to add housing stock to our city through the construction of a DADU. Alternative 2 would also encourage the construction of more housing stock in the rental market by removing the owner-occupancy requirements.

» **Thank you for your comment. The comment is noted.**

Alternative 2 would remove two key obstacles to the construction of more housing units in Seattle's restrictive single-family zoned neighborhoods. Removing the owner-occupancy requirement would encourage homeowners to make the long-term investments required to add permanent housing stock to the rental market. Under the current scheme, homeowners who build a DADU or ADU must take the radical step of gutting their additional housing units should they decide to rent out the main house. Making the changes under Alternative 2 would remove this onerous requirement and encourage owners to make the long-term investments in the rental market that our city needs. Removing the car-centric parking requirements under Alternative 2 removes another key obstacle to the construction of much-needed housing in our city, in which significant changes to single-family zoning is politically unpalatable.

» **Thank you for your comment. The comment is noted.**

Wright, Eric

Among the risks to on-street parking availability, ADUs seem to have minimal impact according to your analysis - and also my personal experience. Also, I think it's likely that increasing density will lead more people to walk or use transit, at least in areas where those two forms of transportation are nurtured.

» **Thank you for your comment. The comment is noted.**

Reading through this EIS, I was impressed that the authors wrote about the history of zoning and red-lining in Seattle. I think it is really important to point out that reserving more than half of the residential

land in the city for single family homes is a relatively recent *choice* and that it is a choice that is rooted in exclusion, financial interest on the part of home owners, and, in some cases, racism.

This EIS goes beyond the debate about ADUs and hints at the greater question of 'who is this city really for?' I, myself, am a home owner (although in a multi-family structure) and I see the damage that housing supply restriction causes here and in other, similar cities. I was lucky to be able to buy in Seattle; I want more people to have that opportunity. Please, let's not become (more) like our Bay Area neighbors to the south, waving a flag of progressive inclusivity while simultaneously refusing to allow new neighbors who don't meet an increasingly out-of-reach wealth threshold.

Reversing exclusionary zoning in the city will not fix all of our equity and affordability issues by itself, but it is certainly a good start that opens up a lot of options for more targeted efforts. I support the city's vision for relaxed ADU rules and I hope we can go much further along the way to increasing density in single family zones.

» **Thank you for your comment. The comment is noted.**

I live in a neighborhood where ADUs are present, although not in large quantities. I find that they generally fit in with the existing structures quite well and I see no reason not to have more of them.

» **Thank you for your comment. The comment is noted.**

Regardless of the analysis here, I have no problem with increasing density in the city - especially in single family zones. ADUs should be a component of that, even if they have a fairly small effect on density. But much more important, in my view, is to allow more general types of multi-family housing in SF areas - houses on smaller lots, townhouses/rowhouses, even small apartment buildings. I know that the political obstacles to this are tremendous; I just want to voice my support for that sort of effort.

» **Thank you for your comment. The comment is noted.**

Wyatt, Bonnie

The North Police Precinct is already over burdened. Low barrier tiny housing has added to crime and undesirable stigma on surrounding neighborhoods. The current city council decisions are trashing my neighborhood of 29 years.

» **Please see Section 4.5, Public Services and Utilities, for a discussion of police services.**

Again, I prefer alternative 2.

» **Thank you for your comment. The comment is noted.**

Alternative 2 looks best to me. As we get to larger lot sizes, the highest and best use is to add rental space rather than tear down for a higher priced SFR

» **Thank you for your comment. The comment is noted.**

I find the full build out scenario for Alt 2, drawing 4.3-25 to be more compatible with the aesthetics of Seattle SFR neighborhoods

» **Thank you for your comment. The comment is noted.**

I support alternative 2

» **Thank you for your comment. The comment is noted.**

Growth must be accommodated. Overall I prefer Alt 2. It is my understanding that the city of Vancouver BC put in utilities and lighting in alleyways in SFR, simplified permitting, and offered low interest loans to homeowners to build "cottage housing". I would love to build a DADU, but as a senior on fixed income, it is out of reach for me in Seattle.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Projection says utilization of existing parking is highest in Alt 2

- » **Thank you for your comment. The comment is noted.**

Yakima Ave Group,

I support Alternative 2 and 3

- » **Thank you for your comment. The comment is noted.**

I think the neighborhoods can absorb these changes.

- » **Thank you for your comment. The comment is noted.**

Our families are smaller. Many single family homes have only 1-2 people in them. Adding the ADUs would be using more water/sewage, etc but probably no more that with families.

- » **Thank you for your comment. The comment is noted.**

Yakima,

The basic nature of the neighborhood won't change with ADUs or backyard cottages. There will be more people living there which may impact the # of cars. But I think that single family homes/neighborhoods can incorporate that change without significant harm to the neighborhood.

- » **Thank you for your comment. The comment is noted.**

There may be more cars. But there may be more people to ride on the buses.

- » **Thank you for your comment. The comment is noted.**

Zemke, Steve - Chair - Friends of Seattle's Urban Forest

As written alternatives 1, 2 and 3 provide a mixture of options and each should be evaluated separately. Alternatives 2 and 3 could also be 4 and 5 by adding the components differently. For example 2 and 3 could both include no off street parking which is preferable for saying space for vegetation and trees. This is not a reasonable way to look at the differences with only 2 options for alternatives,

- » **The final proposal can include any combination of the alternatives considered in the EIS. Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes aspects of Alternatives 2 and 3.**

It seems this proposal where owners do not have to occupy one of the units basically turns the property into rental housing and the units would now basically comprise the property becoming like a duplex or a

triplex from an economic sense in that landlords now would have up to 3 rental units per lot. It is a sneaky way to upzone the property by calling it another name. 1000 square units would have 2 bedrooms I think they would have more than 1.5 people occupy them and if a family could easily have several kids also. Using Portland figures is questionable to estimate how many people would be in a unit.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

Calculation of ADU's impact on tree canopy as only covering the footprint of the building does not take into account the fact that the footprint alone is not the potential total impact. All trees around the building footprint would have to be evaluated as to the building's impact on their root system, particularly the critical root zone. This is not discussed. In addition the impact on saving trees groves is not discussed. A grove comprising 8 or more trees 12 " in diameter is exceptional. Removing one or two trees would obviously make the tree grove no longer exceptional and it would lose it's protection. How many tree groves do you expect the ADU buildings to impact this way?

Also you make no mention of the mitigation requirement in the current ordinance to replace all exceptional trees and trees 24 " DBH removed during development. Why is this provision not being enforced and why is it being ignored? This is SMC 25.11.090.

Also your new current system of data entry does not tally tree size, species and

whether exceptional or not or over 24' DBH. Having them on site plans alone does not measure impact on the tree canopy. How hard is it to enter this data on your new system and why are you not doing it? SMC 25.11.090 would indicate that there is a need to track the trees being removed as well as what's being replaced and where. Again why are you not doing this? You need to implement a system of tree permits to track loss of trees 6 " DBH and larger in an updated tree ordinance. 24" trees are less than 15% of the trees on single family lots. 6" trees are about 46% according to Seattle's Forest Ecosystem Values report in 2012.

Why do you not mention the tree impact referenced in the Tree Regulations Research Report of March 31, 2017? It says the current ordinance is not working. Why do you not mention or propose any mitigation as being required as recommended in that report? The mention of updating the tree ordinance is not a certainty. The City Council proposed updating the ordinance in 2009 and it is now 9 years later. Urging mitigation for expected tree loss from this proposal would help to update the current ordinance.

How is this EIS adequately describing the impact of increased ADU development on tree loss when it is not urging mitigation but saying there is "no significant adverse impacts"? What is your definition of significant? Obviously this ordinance will result in tree loss and make it harder to reach city canopy goals. How many trees over 6 " DBH will be lost? How many exceptional trees will be removed? How many tree greater than 24" DBH will be removed? where will the replacement trees under 25.11.090 be planted? How much will the city charge for the replacement fees?

- » **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

Anonymous 1

ABSOLUTELY Option #1: maintain current ordinance! FAMILIES want to keep Seattle Seattle and NOT become another NYC or Hong Kong. And we VOTE: pay attention Mr. Brian!

- » **Thank you for your comment. The comment is noted.**

Anonymous 2

I think we have done enough to mess up our single family neighborhoods without making it easier for the developers.

» **Thank you for your comment. The comment is noted.**

Anonymous 3

My name is Austin Gunsaulley. I live in District 6. I want more housing because it is abundantly clear that our current housing situation is inadequate for the city's burgeoning population, and because the financial situation is such that we need to take advantage of every opportunity we are presented with.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Anonymous 4

Please remove the parking requirement. It increases housing cost and stock.

- » **Thank you for your comment. The comment is noted.**

Anonymous 5

Support the proposal outlined in Alternative 3 for Off Street Parking ("No off-street parking required for lots with one ADU. One off-street parking space is required for lots adding a second ADU."). This allows for both ample street parking for moderate/small build outs with only one ADU, but increases requirements for larger occupancy lots.

- » **Thank you for your comment. The comment is noted.**

Support Alternative 2 for Owner Occupancy ("No requirement for an owner to occupy the house, AADU, or DADU.").

- » **Thank you for your comment. The comment is noted.**

Support Alternative 2 in Maximum Gross Floor Area & Rear Yard Coverage for more effective lot coverage and usable space. In order to accommodate the community dynamic we are after in single-family dwelling areas, we must provide enough square footage for ADUs & DADUs to feel like single family homes. Without the flexibility for indoor space in Seattle's climate, we won't maintain that community dynamic.

- » **Thank you for your comment. The comment is noted.**

Support the proposal outlined Alternative 2 ("Lots in single-family zones can have an AADU and a DADU."). For single family dwellings with 1-4 occupants (the majority of single family lots in Seattle), land & utility use is minimal. We must support cluster living in the metropolis for better efficiency and maintenance of public lands outside of the city. Alternative 2 achieves reasonable density in single-family zones within the city limits.

- » **Thank you for your comment. The comment is noted.**

Anonymous 6

I am absolutely in support of making it easier - and even incentivizing - the construction of more ADU's! I own a house in a single- family neighborhood in Ballard, but I am a young woman in my 20's who was fortunate to be able to purchase my house from my parents. I'm not as financially comfortable as many of my neighbors, and being able to supplement my income by constructing an additional unit on my (large) property would be an enormous help.

» **Thank you for your comment. The comment is noted.**

I don't care and don't think this should be a factor that prevents our city from becoming more dense. Again, I am a Ballard homeowner

» **Thank you for your comment. The comment is noted.**

I definitely feel that I would be benefited by more housing in my neighborhood. I am young and employed in the public sector, as are most of my friends. If I had not been fortunate to purchase my home from my parents, there is no way I would have been able to afford a home in Ballard. None of my friends will be able to afford a home in the city, or at least not anywhere near me. I don't understand why it's supposed to be better for me to have neighbors who can afford to buy a \$1.5 million property (as the house next door just sold for) than to have three or four homes on that same lot, which could be occupied by people who are more similar to me in age and income.

» **Thank you for your comment. The comment is noted.**

I am a Ballard homeowner and I am absolutely, 100% in favor of changing the single family zoning to create more multi family housing in all parts of the city, including mine! I think it's selfish and discriminatory not to do so.

» **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code changes and are outside the scope of the EIS.**

PLEASE make it easier to build ADU's! In other cities they have incentivized homeowners to build ADU's and rent them out at market rate. If I could get some help - or at least get a reduction in hassle - to build an ADU in my (sizable and unused) backyard, I absolutely would!

» **Thank you for your comment. The comment is noted.**

People do not have an inherent right to store their private property (i.e. Park their car) on public land. Many people have garages or driveways that they do not use, and then complain about not being able to find a spot on the street. Not a right! Let's invest in our public transit system, prioritize affordable housing near transit hubs, and get more people to adopt a car-free lifestyle.

» **Thank you for your comment. The comment is noted.**

Anonymous 7

One thing that came to mind after learning that the total number of people in all structures on a single family housing lot equal ONE HOUSEHOLD: let's say that 2 people rent a DADU in Queen Anne; it's affordable enough for them (one of them works full-time, one works part-time). In their previous apartment they signed up for the Utility Discount Program to help reduce overall expenses. But, now that they are in a DADU, they must include ALL PERSONS (and their accompanying incomes) living on the lot (ie, they must include those living in the main house plus possible AADU) as members of their household when applying for UDP - and now, most likely they will not qualify. This has the potential to

reduce the number of folks who can take advantage of the UDP - and I know that SCL is trying to increase the number of people who sign up for it!

» **Thank you for your comment. The comment is noted.**

Generally speaking, more transit service is desperately needed. You can't reduce parking requirements (which is a good incentive to get people out of their car) without first having excellent transit in place.

» **Thank you for your comment. The comment is noted.**

Anonymous 8

I support flexibility in designing ADUs, no owner occupancy restrictions, and no parking requirements. We need the biggest variety of housing we can get.

» **Thank you for your comment. The comment is noted.**

Density is a GOOD thing. It brings economic development to my neighborhood in the form of more healthy businesses. It allows for more folks to capitalize on the wonderful opportunities afforded by our city, currently large exclusively capitalized upon by the wealthiest who can afford single family homes. I don't care at all about how many people live in a house, be it 1 or 10. Just get this legislation passed and legalize housing!

» **Thank you for your comment. The comment is noted.**

We need to stop giving credence to parking concerns as an environmental issue. Nobody owns street parking for gods sake and I am sick and tired of entitled drivers whining about the loss of their formerly exclusive capitalization of the public ROW! That said I think it mildly concerning that we're building units potentially far from public transportation though, though really I'm sure it'll be fine for the most part. If there are concerns about buses being more full, I think that's a GOOD thing. For example I live in Ravenna, and I'm very concerned that my 71 bus will get cut because there simply aren't enough riders. Adding more folks, esp. lower income folks who are more likely transit users and are more inclined to ride the bus, increases the chances my route stays alive.

» **Thank you for your comment. The comment is noted.**

I think aesthetics should be totally disregarded as an impact, since for the most part, few people will ever even see the units in question.

» **Thank you for your comment. The comment is noted.**

I have no concerns with respect to this.

» **Thank you for your comment. The comment is noted.**

I'm currently really conflicted on the issue of whether or not I support ADUs. On one hand, I am concerned that ADUs will make it harder to densify SFH regions in the future and add more housing (which I consider to be a public good). They will add improvements to the land, which will make it more expensive to purchase for redevelopment. Furthermore, more people will be living on this land, specifically lower income folks, whose eviction will pose a political challenge to redevelopment, an argument I'm certain will be employed by anti-housing people, some of whom might even be opposing this very piece of legislation. On the other, we are currently in a housing crisis, and every drop of supply helps with the abatement of these surging rents, and these units might allow for folks to age in place which is something I strongly support.

» **Thank you for your comment. The comment is noted.**

I want these units to ensure these units are built as cheaply built as possible, so in the future when it comes time to further densify our city, they will be ready to be torn down. Furthermore, lower the cost of construction (including regulatory costs) the cheaper it is to build this kind of housing, ensuring that these savings can be passed onto lower income folks. I want these units built, just be sure that it's possible (both politically and economically) to replace them with midrises or something in the future

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

I support more housing. I am however concerned about the long term ramifications of this legislation.

- » **Thank you for your comment. The comment is noted.**

Anonymous 9

Please expand to include ADU addition for Duplexes with adequate lot size.

- » **The study area for the EIS includes land zoned single-family outside of existing urban villages and urban village expansion areas studied in the Mandatory Housing Affordability EIS. Please see Exhibit 2-1 in Chapter 2, Alternatives, for a map of the study area.**

I am in support of Alternative #3.

- » **Thank you for your comment. The comment is noted.**

Anonymous 10

Please choose Alternative 2! Dormers and green roofs are wonderful, I would love to see more of them in my neighborhood and for our cottages to be as pretty and green as our city deserves.

- » **Thank you for your comment. The comment is noted.**

This underscores the need to go with Alternative 2. Raising maximum household size and allowing multiple ADUs will be best for equity and affordability.

- » **Thank you for your comment. The comment is noted.**

I support Alternative 2. Minimizing parking and lot coverage requirements makes sense. We are becoming a real city. The house I own will soon be walking distance from Link Light Rail.

- » **Thank you for your comment. The comment is noted.**

A majority of Seattle is very restrictive and exclusive single-family zoning with very large lot sizes. We have lots of space to add ADUs while remaining compatible with a residential development pattern. I have no concerns with Alternative 2 in this regard, and it has the most benefits in other areas such as affordability.

- » **Thank you for your comment. The comment is noted.**

Please choose Alternative 2! It will have the largest impact the fastest. Seattle's housing crisis can't wait.

- » **Thank you for your comment. The comment is noted.**

Please don't let process delay these changes any longer. People in Seattle are desperate for more housing. We can't wait.

» **Thank you for your comment. The comment is noted.**

Please encourage the building of ADUs by reducing utility hook-up fees and paperwork. Our housing crisis can't wait.

» **Capacity charges are levied by King County; the City does not have authority to waive those fees. King County has two studies underway that may lead to changes to the capacity charge, including charges for a new ADU. See kingcounty.gov/services/environment/wastewater/capacity-charge/review-studies.aspx for more information. Please also see the frequent comment response regarding King County Sewage Treatment Capacity Charges.**

Anonymous 11

It's a bad idea to destroy the special quality of our single family neighborhoods and this will achieve such a negative result. Parking will worsen. Already overburdened amenities will be further overcrowded. Noise and privacy will be lessened. Many of these will be rented out via Airbnb, etc. causing a revolving cast of strangers on what were close knit blocks.

This stinks of an urbanist "camel's nose under the tent" measure to further erode the amount of quality within Seattle single family neighborhoods. I'm vehemently opposed.

Existing zoning can accommodate all of the projected population growth expected in the next decades. Why wreck such a wonderful element of the city with this misguided idea?

» **Thank you for your comment. The comment is noted.**

Anonymous 12

ADUs have great potential to be a net good for Seattle! I love living here, and I love the number of new people coming into the region. I encourage the City to adopt Alternative 2 or 3 and increase density, so that those of us who are already here are able to stay, and those of us who want to come here are able to do so.

» **Thank you for your comment. The comment is noted.**

I was particularly pleased to see that Alternatives 2 and 3 result in fewer teardowns and help maintain the aesthetic character of neighborhoods. I currently live in a condo in Wallingford and love the character of the houses in the Wallingford/Fremont area. Solutions that can increase density while reducing teardowns are wonderful!

» **Thank you for your comment. The comment is noted.**

As a renter in Seattle, a solution that decreases housing prices even marginally is something I'm in favor of. Both Alternative 2 and Alternative 3 would increase my options for housing by providing more types of housing, and by increasing the housing supply and helping to flatten out housing prices.

» **Thank you for your comment. The comment is noted.**

Anonymous 13

We need to have more housing and aadu/dadu are key to making that work. Please don't make it too dependent on parking.

» **Thank you for your comment. The comment is noted.**

Alternative 3

» **Thank you for your comment. The comment is noted.**

Anonymous 14

Thank you for your hard work on the ADU EIS and the opportunity to provide comment.

I am writing in support of Alternative 2, and would like to provide some additional suggestions. My comments are as follows:

1. Roughly 1/5 (25,000) of the houses in the SFR zone are rentals. Please don't preclude those owners from adding housing units in high opportunity neighborhoods!

As the EIS made clear, eliminating the owner occupancy will NOT result in a rush on single family homes by developers. The economics will continue to result in tear downs being replaced by large single family homes, and this trend is even more likely to continue if ADUs and DADUs are not allowed on rental properties! By prohibiting landlords from adding ADUS or DADUs on their properties, Seattle is effectively legislating unsustainable development in the form of teardowns and the subsequent construction of McMansions.

Providing access to high opportunity neighborhoods for low income people will result by adding more rental units in the SFR zone, not by eliminating competition from developers and lowering costs for buyers. Lower income families can no more afford to buy a home for \$600,000 than \$1.5 million. But they may be able to afford to rent a small DADU if those options are made more available. It is also quite likely that landlords will be more inclined than homeowners to add an ADU or DADU. Why prohibit that?

2. The suggestion in Alternative 3 to allow 2 ADUs is a good one. Include that in Alternative 2 as well.

3. The Alternative 3 suggestion to implement an FAR limit is a good one to the extent that it might decrease the number of teardowns and the subsequent construction of McMansions. However, I would suggest that a size allowance be added if an ADU is included in the structure, whether it is below grade or not. The 2500 sq ft limit on lots 5000 sq ft and smaller does not allow much room for an ADU, much less two ADUs as proposed in Alternative 3. I suggest increasing the house size to 3000 sq ft if an ADU is included. The city's goal is to encourage the construction of ADUs, not just limit the construction of McMansions. With this stipulation, I would include the FAR limit in Alternative 2 as well.

To take the FAR idea a step further, consider allowing larger DADUs on oversized lots. There are a lot of lots in the SFR 5000 zone that are significantly larger than 5000 sq ft and could easily accommodate a larger DADU. The FAR concept would be a better limit in these cases than the proposed 1000 sq ft limit. A 1000 sq ft DADU on a 5000 sq ft lot would be a FAR of .2. How about establishing the greater of 1000 sq ft or .2 FAR as the limit? If there is a desire to limit the size of the main house, impose a combined FAR of .5. That way, someone could build two 1500 sq ft houses on a 6000 sq ft lot, which would be far preferable to one 3000 sq ft McMansion.

4. The suggestion in Alt 3 to apply MHA requirements for a second ADU or DADU is a terrible idea. ADUs and especially DADUs have a high cost per square foot given their small size. Construction cost

is often cited as one of the main reasons that more are not being built. If the city's goal is to encourage more ADUs, why would you want to impose this barrier? I understand the need for more affordable housing, and I am in favor of MHA requirements on large multi-family projects, but small landlords and homeowners can't afford this additional cost.

A few additional thoughts that I don't believe were discussed in the EIS:

5. Consider allowing an ADU or DADU to be added to pre-existing duplexes in the SFR zone. Current regulations prevent owners of these structures from adding more than 500 sq ft of living space, much less adding an ADU or DADU. Get rid of this outdated regulation.

6. Consider allowing 2nd story decks to be added to DADUs. Existing rules prohibit decks over a certain height in backyards and thus prevent adding a deck when a DADU is constructed over a garage. Outdoor living space is critical to healthy living. If the concern is that the DADU resident will be staring down into the neighbor's backyard, consider requiring that the deck not be adjacent to a property line (unless there is an alley).

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

Anonymous 15

Dear members of the Seattle City Council--

My name is Brice Maryman. I live in the Central District in a single-family home that was originally built as affordable housing after WSDOT sold the land--originally part of the I-90 construction staging--in the early 1990s. This home is no-longer affordable and, if I wanted to build an ADU, my reading of the rules shows that it would be illegal.

While I have no illusion that removing unnecessary restrictions to ADUs and DADU development will solve our housing crisis, I also know that liberalizing the rules relating to this development type is a strong, necessary step. We need to open up neighborhoods to more households and more types of residents. We can't use our land use code to build walls of unaffordability. We need more housing in the city, more transit-oriented housing regionwide - to address our housing and climate crises.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12 - we could easily support a cooperative of 3-family sized households on a typical 5000 sf lot - and this would allow more low-income and non-market housing in single family zones. The city looked at doing this in the late 70s, but ultimately relented to anti-housing homeowners.
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.
10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.
11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

Thank you for your consideration for these changes, and for continuing to make it easier for a variety of people

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Anonymous 16

The Owner Occupancy Requirement should not change from what it currently is. This requirement is necessary to ensure houses are not redeveloped by businesses. The current requirement means the owner has skin in the game. There is absolutely pride in ownership verses an all rental property.

- » **Thank you for your comment. The comment is noted.**

Anonymous 17

It is absurd to claim in the EIS that allowing construction of three multi-story units on smaller lots will not destroy the aesthetics of SF neighborhoods. Over time, a decreasing number of SF houses will be surrounded by incompatible clusters of three poorly designed multi-occupant rentals. Since developers won't have to reside on their property, they will have no incentive to preserve the character of SF neighborhoods.

- » **As noted throughout the Final EIS, localized impacts from clustering of new ADUs could occur.**

Allowing three multi-occupant units per lot, and decreasing lot size, is grossly incompatible with existing development in SF zones. It will rapidly eliminate SF neighborhoods, other than hold-outs who will become islands surrounded by multi-story, multi-occupant rentals. If the true goal is to eliminate SF zones, be honest enough to state this and make the case to the public for such a large change in demography.

- » **Thank you for your comment. The comment is noted.**

The city has not presented any data to support O'Brien's claim that his proposal will increase affordable rental housing. Developers will build to market rate and accessory units in currently desirable residential areas will rent at the higher end of the scale, not for those seeking affordable units.

- » **The objective of the project is to remove regulatory barriers to make it easier for property owners to permit and build ADUs and increase the number and variety of housing choices in single-family zones. As outlined in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would result in a slight reduction in the upward pressure on rents and housing prices.**

The city has not made a convincing case that existing code imposes a barrier to demand by property owners for adding ADUs and backyard cottages. The proposed code change will lead to the elimination of single family housing in much of the city. Instead of opening the flood gate to irreversible loss of SF neighborhoods through rapid development, the city should take an incremental approach. Instead of allowing property owners to build both ADUs and DADUs on their lots, the city should make small changes to existing code to remove perceived barriers to construction of ONE ADU OR DADU per lot, but not both. Wait five years to see whether there is a substantial increase in owner construction of one accessory unit, and whether this provides some relief to demand for affordable housing. To preserve the intended character and purpose of the existing accessory unit code, MAINTAIN the current requirement that the owner must reside on the property in order to be granted a permit. Also maintain existing code for the number of unrelated occupants per accessory structure to help preserve character of residential neighborhoods.

These are all good faith steps that council should take to convince property owners that the intent of this proposal is truly to facilitate the ability of owners to remain on their property by constructing a rental unit, as has been stated repeatedly by O'Brien. His proposal for large changes in the code to allow rapid construction of three multi-occupant units per lot is widely viewed as a thinly veiled way of circumventing the city's master plan and allowing single family houses to be replaced by dense development outside the bounds of the urban villages. The removal of the owner residence requirement can only be interpreted as a means of allowing developers to tear down existing SF houses and replace them with three multi-occupant structures without having to live with the consequences of these changes to neighborhood character.

- » **As outlined in Section 4.1, Housing and Socioeconomics, the proposed Land Use Code changes would result in the creation of 2,310 additional ADUs under Alternative 2, 1,430 additional ADUs under Alternative 3, and 2,460 additional ADUs under the Preferred Alternative, compared to**

Alternative 1 (No Action). While construction cost certainly impedes construction of additional ADUs, the analysis in this EIS shows that existing regulations also act as a barrier.

The EIS completely fails to discuss impacts of the proposed Land Use changes on how increases in stormwater runoff will be mitigated. If these changes are adopted, whole residential neighborhoods could be rapidly converted to three multi-occupant units per lot. These changes would increase ground coverage dramatically, leading to much greater levels of water runoff from new structures. The city and county's wastewater treatment infrastructure is wholly inadequate to handle existing levels of runoff. For the EIS to be credible, it must address this critical issue of how large potential increases in wastewater runoff will be mitigated. Council should not adopt the proposed code change without a detailed and feasible plan for large scale mitigation of wastewater runoff.

- » **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

The EIS ignores the expert witness testimony in the examiner's hearing about the parking impact of allowing the construction of three multi-occupant units per lot in residential neighborhoods. On-street parking is already tightly limited in many neighborhoods, and allowing a large increase in the number of occupants per lot, while removing the current requirement for off-street parking, will explode the parking problem in neighborhoods. It is demagogic to suggest that many of the new occupants in residential neighborhoods will rely on public transport. These areas are often remote from transit and inadequately served. The nearest bus stop may be far from interior streets in residential areas and residents will inevitably rely on cars as most do now in these areas. The few buses that serve residential neighborhoods are chronically over-crowded and behind schedule. A massive increase in population density in these neighborhoods, without a scaled increase in transit service, and re-routing to provide closer stops, will result in even greater traffic congestion getting in and out of these areas than currently exists.

- » **Please see the frequent comment response concerning impacts to parking.**

As discussed below, existing stormwater runoff treatment infrastructure is grossly inadequate to meet current levels of waste water. Allowing a large increase in population density in residential neighborhoods, without a comparable upgrading of wastewater utilities, will increase flooding and pollution due to large increases in demand and ground coverage.

Sewage lines in these neighborhoods are antiquated and barely able to cope with existing demand. Massively increasing population density without scaled upgrading and increases in sewage lines will result in increased failures and pollution.

Road maintenance in residential areas cannot keep up with current levels of use and local roads suffer from long-term potholes, cracked surfaces, and disintegrating curbs. The large increase in local traffic that will follow the proposed large increase in density in these neighborhoods will worsen road condition.

- » **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

Anonymous 18

I think this is one of the most efficient options to increase housing options with minimal aesthetic impact.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 seems to best serve the greatest number of seattle residents

» **Thank you for your comment. The comment is noted.**

I appreciate that this puts more creative options for homeowners to afford in this expensive market while also leveling the rental prices and supply

» **Thank you for your comment. The comment is noted.**

I think this is a great way to allow the city to grow along with the increase to multi fam and still giving people an economical option in a smaller more private setting.

» **Thank you for your comment. The comment is noted.**

I don't agree with the forecast. This can only cause increased parking issues in an already constructed parking situation especially with the decrease in parking spaces from bike lanes and lack of parking and economical parking planned near new light rail stops

» **Please see the frequent comment response concerning impacts to parking.**

Increasing alternative energy incentives in general and with A/DADUs could be helpful.

» **Thank you for your comment. The comment is noted.**

Anonymous 19

Please support option 2. Adus are a way to increase housing in the city and do so across the board, not only in neighborhoods without entrenched opposition to new development.

» **Thank you for your comment. The comment is noted.**

The lack of impact on displacement make this a clear step forward to increase housing and hold down skyrocketing cost of living without adversely impacting low income and people of color. It is a clear win and alternative 2 should be supported.

» **Thank you for your comment. The comment is noted.**

The fact that adu liberalization such as in alternative 2 would slow home demolition shows that more adus are needed to help neighborhoods retain their character while adding much needed units.

» **Thank you for your comment. The comment is noted.**

Please support alternative 2

» **Thank you for your comment. The comment is noted.**

Anonymous 20

I support Alternative 2.

» **Thank you for your comment. The comment is noted.**

Anonymous 21

I am glad to see these proposals and strongly advocate for more housing options and making the process of adding dwellings to a property a less onerous process. I think option 3 is the best middle ground but would like to see the same permitting benefits offered for option 2 applied here. The streamlining of permitting on option 2 feels like steering on the part of the city and I do not like that. Design review should play a vital role in helping create appealing and useful built environments as this moves forward.

» **Thank you for your comment. The comment is noted.**

I favor option 3 ultimately but like streamlined permitting in option 2. I would like to see the same streamlining for option 3.

» **Thank you for your comment. The comment is noted.**

I think adding one parking space when two ADU's are built is responsible and will help make the housing approachable to more people, many of whom need a car for their work or life, and would mitigate the sense of claustrophobia that could easily create a more hostile feeling environment. Our public transit infrastructure and timing is woefully under developed to get as many people out of cars as the city seems to want to.

» **Thank you for your comment. The comment is noted.**

I think option 3 offers the most pragmatic balance of increasing density and scaling up services. I would like to see more of our power lines buried during this growth to create a more robust and aesthetically pleasing power grid,

» **Thank you for your comment. The comment is noted.**

I know that I, and I believe many citizens, would embrace the opportunity to offer an affordable rent and stable home for a fellow citizen. We as a community can improve the life situation for many and do so literally in our own back yards.

» **Thank you for your comment. The comment is noted.**

I think balancing scale is important and allowing AADU/DADU size to be big enough to fit the needs of a broader group of people without being crowded or overwhelming.

» **Thank you for your comment. The comment is noted.**

I think with proper design we can increase density across the city and in the process create stronger and more inclusive communities.

» **Thank you for your comment. The comment is noted.**

Anonymous 22

First, the proposal seems well defined and reasonable to me. Well thought out.

Second, costs and time required associated with permitting and inspection is constricting and discouraging. While expediting and lowering costs is addressed, it is not in detail. Final results in this regard will be very important to encouraging these units to actually be built, and increasing the housing

stock in Seattle, the actual aim of this proposal. Permitting, inspection costs and time requirements must be significantly reduced.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

As a homeowner and retiree with no background or experience in planning or building, but an interest in adding a dadu, the economics need to look encouraging. Costs associated with permitting, inspections, code compliance, construction and afterwards the increase in tax liability will all contribute to the decision to build or not. There needs to be a determined effort to cut these expenses for this proposal to be effective.

- » **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Anonymous 23

There should be no owner occupancy requirement for ADUs.

- » **Thank you for your comment. The comment is noted.**

There should be no off-street parking requirements for ADUs. On that measure, alternative 2 is best.

- » **Thank you for your comment. The comment is noted.**

Alternative 1 is non option.

- » **Thank you for your comment. The comment is noted.**

Anonymous 24

We are property owners in Montlake and like alternative #3. We currently have an ADU and would like to "downsize" ourselves by adding an additional ADU. If we can't do this, we will move out of the area. We have lived here for over 20 years and love the location and our neighbors. We have had great success with our ADU and have fantastic renters. The house is too big for us and we would like to grow old in place. This would help us maintain our house here and help out with affordable housing for Seattle.

- » **Thank you for your comment. The comment is noted.**

Anonymous 25

It appears the proposed revisions to existing Land Use codes are in conflict with the goals to improve living conditions here in Seattle. Making revisions to existing Land Use Codes to force changes in our citizen's lifestyles to conform to some master plan of life in Seattle is completely out of the realm of building a more vibrant city..

- » **Thank you for your comment. The comment is noted.**

The visual scenarios presented herein are not realistic, much the same as the expected outcome of suggested revisions to the Land Use Codes her in Seattle.

» **Thank you for your comment. The comment is noted.**

Given the values in the tables included, revisions to the Land Use Codes do not truthfully reflect the nature of transportation/parking in Seattle. The public transportation system in this city is horrendous, yet is still being proposed as a measure of travel in and around Seattle. Do not regulate properties by assuming other cities' methods will work in Seattle (i.e. Portland).

» **Please see the frequent comment response concerning impacts to parking.**

The barrier's to be removed while claimed to be in the interest of property owners, apply mainly to costs associated with developers and contractors. Has there been a study about how many land developers actually reside in Seattle?

» **Please see Section 4.1, Housing and Socioeconomics, for a discussion how the proposal might change the underlying real-estate economics in single-family zones and if it makes properties more attractive as rental investments rather than as owner-occupied assets.**

The statistics used for the Socioeconomics relating to this proposal are conflicting and completely opposite what I see in my neighborhood. People cannot afford to rent living spaces, let alone the units up for rent are higher in order for landlords to remain profitable.

» **Thank you for your comment. The comment is noted.**

Once again, the impacts listed in this report are in conflict with the experience in real life. Every month we get newsletters agonizing over the increased burden on our public utilities and the increased costs thereof. Condensing the population by using ADU's, as defined by the numbers presented in this report, can only increase the cost of our Public Services hence pushing the cost of living in Seattle ever higher.

» **Thank you for your comment. The comment is noted.**

Anonymous 26

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allowed by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Anonymous 27

The current owner occupancy requirement is too burdensome because there are times and circumstances where it simply is not feasible.

- » **Thank you for your comment. The comment is noted.**

My house is close to bus lines and retail outlets, so I do not think it needs extra parking spaces.

- » **Thank you for your comment. The comment is noted.**

I strongly support alternative 2.

- » **Thank you for your comment. The comment is noted.**

Anonymous 28

I support Alternatives 2 and 3. Increasing density is desperately needed in the city, but allowing specifically more ADUs will allow the city to maintain its neighborhood charm while adding much needed housing.

» **Thank you for your comment. The comment is noted.**

With the analysis from this chapter in mind, I still strongly support alternatives 2 and 3 to better maintain aesthetics of neighborhoods while allowing growth

» **Thank you for your comment. The comment is noted.**

With the analysis from this chapter in mind, I still strongly support alternatives 2 and 3.

» **Thank you for your comment. The comment is noted.**

With the analysis from this chapter in mind, I still strongly support alternatives 2 and 3, although greater for alternative 2

» **Thank you for your comment. The comment is noted.**

With the analysis from this chapter in mind, I still strongly support alternatives 2 and 3, although greater for alternative 2

» **Thank you for your comment. The comment is noted.**

With the analysis from this chapter in mind, I still strongly support alternatives 2 and 3.

» **Thank you for your comment. The comment is noted.**

Anonymous 29

Less regulations and more housing please.

» **Thank you for your comment. The comment is noted.**

I like alternative 2

» **Thank you for your comment. The comment is noted.**

more housing = lower rents

» **Thank you for your comment. The comment is noted.**

I live in district 1. I support alternative 2.

Please eliminate the parking requirement.

» **Thank you for your comment. The comment is noted.**

Anonymous 30

As a homeowner I strongly support easing construction of ADUs

» **Thank you for your comment. The comment is noted.**

I think pricing people out of their homes is far more aesthetically concerning than more home options

» **Thank you for your comment. The comment is noted.**

I would like to see zoning changes to allow more housing to address the rising costs associated with a successful city

» **Thank you for your comment. The comment is noted.**

Increased density allows for better access to services like busses, it is environmentally responsible

» **Thank you for your comment. The comment is noted.**

The environmental impact of forcing people out of their homes by not having housing for a growing city is damaging in the increase in commuter traffic and the increase in homelessness. ADUs are a small step in the right direction that is coming far later than it should.

» **Thank you for your comment. The comment is noted.**

If we build to require parking, we force a car per person; we've already exceeded the population that idea can support.

» **Thank you for your comment. The comment is noted.**

Anonymous 31

I am interested in changes that improve the aesthetics of housing opportunities within our neighborhood where housing demand is very high because of the proximity to downtown and university employment. Parking and transportation are very important as are access to public services and utilities. Alternative 2 offers realistic gross floor area for DADU. In most cases a height limit 1 to 3 feet higher than existing limits makes sense. Owner occupied housing will assure accountability to neighbors. An off street parking requirement is a good way to encourage effective use of public transportation which is quite accessible in our neighborhood. This neighborhood has excellent tree coverage and I am in favor of continuing this policy.

» **Thank you for your comment. The comment is noted.**

Anonymous 32

I much prefer Alternative 2 due to the lifting of the requirement that homeowners live in the home for 6 months of the year. This is the only barrier keeping me from building a DADU on my property in Greenlake.

» **Thank you for your comment. The comment is noted.**

Anonymous 33

It is hard to imagine that the models used for illustration can have led to the conclusion that there is no significant impact on aesthetics.

» **The Full Build-Out scenario was included only in the aesthetics analysis to illustrate a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it here to illustrate the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.**

In trying to tackle serious problems in a hurry you risk many unintended consequences that could be avoided with more careful study. People who want to and can afford to build ADUs or DADUs can and do construct them now, at increasing rates. It is not at all evident that this is the solution to the affordability problem. However increased density makes sense where it makes sense. Alternatives 2 and 3 do not take that into consideration with their one-size-fits-all recommendations.

» **Please see the frequent comment response regarding individual neighborhood review.**

The fallacy in the options is that the proposals do not take into account the differences in neighborhoods in the city of Seattle and their ability to accommodate the proposed changes in policy and regulation. Seattle is not a one-size-fits-all city, based largely on geography. Current regulations allow the flexibility to increase density where it can be accommodated.

» **Please see the frequent comment response regarding individual neighborhood review.**

As noted above, it is incomprehensible that the study concludes there is no need for mitigation in the area of land use. By using study locations that exclude neighborhoods close in to the city and suggesting that solutions that may have marginal impact to those locations also have marginal impact to the very different neighborhoods not studied defies logic. And there are certainly public safety and security issues that received no attention at all.

» **Please see the frequent comment response regarding individual neighborhood review.**

It is incomprehensible that the study concludes there are only marginal impacts and no need for mitigation in any area. In the area of housing affordability and displacement, the cost of building ADUs is such that they would not be affordable to lower income residents since homeowners would have to recoup their costs. If a house sold, it is most likely a developer would purchase the property and profit from resale of multiple units, thus reducing the availability of what affordable housing exists. ADUs are being built at an increasing rate by those who can afford to do so, but half of those are used as short-term rentals for visitors or tourists, not for Seattle residents.

» **Thank you for your comment. The comment is noted.**

This is an extreme example of not taking into consideration varying impacts of the proposals by using study locations that do not represent all neighborhoods. I can barely drive through North Queen Anne because of the narrow, winding streets with cars parked all along both sides of the roads. I actually bought a smaller car when we moved here so I could navigate the streets. To state there is marginal impact to adding more cars to the streets in these neighborhoods removes any semblance of objectivity from the report.

» **Please see the frequent comment response concerning impacts to parking.**

This is clearly an area where impacts vary by neighborhood. Sewer pipes in older neighborhoods are going on 100 years old. We just had to replace ours, and yards up and down the streets show signs we are not alone. You must consider all the neighborhoods when making a proposal - not four areas unrepresentative of all.

» **Thank you for your comment. The comment is noted.**

Anonymous 34

I just strongly believe that whatever you decide to do it should be city wide, not just certain zones. If you are going to allow these the option should be available to all homeowners, not just sum. In a city as

expensive to live in as Seattle this is as much an economic issue (supplemental income for people) as it is a housing one. If the option is going to be available it should be available to all.

- » **Thank you for your comment. The comment is noted.**

Anonymous 35

Aesthetics should be considered so that ADUs don't change the aesthetic character of a neighborhood.

- » **Please see Section 4.3 for a discussion of aesthetics.**

Many Seattle neighborhoods are already suffering from lack of parking and congested streets. ADUs will exacerbate this problem. Please don't ignore this! Neighborhoods are too crammed as it is, and new occupants are not car-free as is sometimes hoped/suggested.

- » **The parking analysis presented in Section 4.4 analyzed potential impacts that could result from reducing or eliminating off-street parking requirements.**

Anonymous 36

Please allow more homeowner and infill development through DADUs. I'm trying to get my backyard cottage planned and the county/city won't let me connect to my existing sewer stack, wants to charge me a 12K connection fee, parking is required, etc.

- » **Thank you for your comment. The comment is noted.**

Anonymous 37

I strongly support alternative 2. Alternative 3 is too restrictive for ADU owners and causes reduced housing stock and flexibility.

- » **Thank you for your comment. The comment is noted.**

Parking should not be required.

- » **Thank you for your comment. The comment is noted.**

Anonymous 38

There needs to be a requirement for ALL new development including ADU, DADU to provide off street parking for the residents. As a tax payer I shouldn't have to subsidize any developer or home owner who is renting out their property by providing the on street parking. Every home should have a minimum of one space for every unit on their property.

- » **Thank you for your comment. The comment is noted.**

Off Street Parking Requirements - There should be a parking requirement for ALL alternatives - as in Alternative 1 - if we are adding density to our neighborhoods then the property owners need to be responsible for providing parking on their property and not leave it to the tax payers to be responsible for street parking. Our roads are so busy now with cars parked on both sides and only place for one single car to drive down the middle - it is dangerous to drive and to be a pedestrian.

Owner occupied - There should be a requirement than an owner occupy either the main dwelling or the ADU or DADU - as in Alternative 1 or 3. We cannot allow developers or absent landlords to buy up the homes and turn them into multi-unit housing and not be present living in the neighborhoods. Please protect what makes our neighborhoods great by ensuring that owners occupy their homes or ADUs.

Number of ADUs - I support either Alternative 2 - I think it is fine to increase the number of living units in the neighborhood as long as the there is off street parking provided and the owner occupies the property.

Entry, Lot coverage, Max Height - etc - I support any of the alternatives and think these are fine things to change for more density.

» **Thank you for your comment. The comment is noted.**

I am supportive of increasing density if done in a smart way - I don't think changing all Single Family housing into multi-family is the smart way but do think that with proper planning, owner occupancy requirements and off street parking requirements that adus could be added into all neighborhoods. Let's grow without taking away the livability in our Seattle neighborhoods.

» **Thank you for your comment. The comment is noted.**

Anonymous 39

We are concerned about the light pollution and light trespass. However, we are 100% in support of density/affordable housing and DADUs. Just please require all lighting of 2700K color temperature/ lower lumens/full shield/full cut off fixtures/and pointed down/mounted on first story preferred to stop light trespass.

» **Existing regulations applicable in single-family zones requires that all exterior lighting is shielded and directed away from adjacent residentially zoned lots. In addition, the Director of the Seattle Department of Construction and Inspections may require that the intensity of illumination be limited and that the location of the lighting be changed.**

Anonymous 40

Adding ADU / Dadu helps the supply side of housing

» **Thank you for your comment. The comment is noted.**

Building & population residential area densities would still be low

» **Thank you for your comment. The comment is noted.**

Not any different than building more apartments

» **Thank you for your comment. The comment is noted.**

Demand on limited neighborhood parking would unavoidably increase

» **Thank you for your comment. The comment is noted.**

Waiving the Owner occupancy requirement gives flexibility for those who have to move but want to keep their property - not forced to sell

» **Thank you for your comment. The comment is noted.**

I support Alternative 2

- » **Thank you for your comment. The comment is noted.**

The scale mitigation and setbacks are adequate

- » **Thank you for your comment. The comment is noted.**

Anonymous 41

This impressive research confirms common sense: exclusionary single family only zoning is bad for the environment, affordability, and diversity. I hope something like Alt.2 is adopted--reducing pre-development costs is important and will place ADU/DADU development in the reach of more homeowners, and removing the owner occupancy requirement is important as well.

Home ownership has become the primary way the middle class to accumulate wealth, but it comes with a catch--it's difficult to access that wealth if you want to continue living in your home. This is good for homeowners who want to downsize, and renters looking for more options. The changes to facilitate ADU/DADU growth should be implemented as quickly as possible.

- » **Thank you for your comment. The comment is noted.**

Anonymous 42

Our city is in a housing crisis. Outside of rezoning our single-family zones to allow more housing options, this remains the easiest choice to add housing to 3/4's of the City. After reviewing the draft EIS I fully support Alternative 2 as the best option for the future of Seattle.

- » **Thank you for your comment. The comment is noted.**

Please consider alternative 2 as the way to address our housing affordability and shortage.

- » **Thank you for your comment. The comment is noted.**

Under alternative 2 there is less risk of displacement in high displacement areas, while not causing significant increases in land value. It has the added benefit to allow current landowners an additional income stream to help alleviate the high cost of living. Further, alternative 2 has the greatest potential to add much needed housing throughout the city, not just in urban villages.

- » **Thank you for your comment. The comment is noted.**

Under the current system, the majority of the population growth the City has experienced has been in located within Urban Villages or along traffic choked arterial's. It has been widely reported most SFR zones have actually lost population since the 1970's. This has largely been a result of household size declining. Adding density to single-family zones gives residents more living options and places them near other amenities, such as parks, while spreading the population growth over the entire City.

- » **Thank you for your comment. The comment is noted.**

Anonymous 43

I'm in favor of alternative 3 for maximum flexibility -- in our current housing crisis we need as much higher density housing as possible. Alternative 2 is fine, however.

- » **Thank you for your comment. The comment is noted.**

Anonymous 44

My name is Bryant Durrell. My household is made up of myself and my wife.

I live in District 6. I want more housing because rental and purchase prices are too high in Seattle; lower cost of living keeps our city diverse and vibrant and directly helps the homeless problem.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.
10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit

reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Anonymous 45

I believe that the most permissive program for ADUs is best. In that light, Alternative 2 with some modifications would be best. I prefer the Sightline Institute's approach.

"For the final preferred alternative, we support Alternative 2 as proposed, with the following modifications:

1. allowance for two attached ADUs (as in Alternative 3) or two detached ADUs, or one of each
2. minimum lot size of 2,000 ft² for detached ADUs
3. increase in maximum height of three feet over the existing limit, regardless of lot width, for detached ADUs
4. increase in maximum height of two additional feet for projects with green roofs or those pursuing the city's "Priority Green" program
5. maximum size limit of 1,500 ft² for attached ADUs
6. removal of the occupancy limit on unrelated people
7. allowance for placement of a detached ADU in a lot's front yard or side yard
8. removal of all restrictions on the location of entries for detached ADUs"

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

ADUs not only provide additional lower cost housing options, but also can help reduce displacement. Residents facing displacement pressure can gain rental incomes by producing ADUs. Reducing barriers to building ADUs and DADUs is essential to providing the housing mix that we need and to adding units in single family zones.

- » **Thank you for your comment. The comment is noted.**

It would be best to remove any additional parking requirements for ADUs, not only in urban villages.

- » **Thank you for your comment. The comment is noted.**

Anonymous 46

The question is a little unclear, but I prefer Alternative 2. I am strongly opposed to requiring additional off-street parking and do not think the owner-occupation requirement is beneficial.

» **Thank you for your comment. The comment is noted.**

I grew up on Queen Anne, in one of the now-most expensive of the single family areas. The housing prices there and throughout the city are unconscionable, particularly as household size goes down in many areas. I support Alternative 2 because it appears likely to lead to the greatest production of additional housing and will require the fewest additional parking spots in this city that is overwhelmed by cars.

» **Thank you for your comment. The comment is noted.**

I think the added variety will enhance the aesthetic appeal of single-family neighborhoods.

» **Thank you for your comment. The comment is noted.**

The changes in density are so minor as to be unnoticeable, and in any case are certainly compatible given the fact that density has decreased over the years as household sizes have gone down.

» **Thank you for your comment. The comment is noted.**

This does not appear to be an issue under any alternative.

» **Thank you for your comment. The comment is noted.**

This underscores the need to maximize the production of units.

» **Thank you for your comment. The comment is noted.**

Anonymous 47

I support making it easier to build Accessory Dwelling Units. Please also do more to increase density throughout the city and to implement the full scope of the Housing and Livability Agenda in even more impactful ways.

» **Thank you for your comment. The comment is noted.**

I support making it easier to build accessory dwelling units. Our city needs more housing of all kinds, and removing current barriers and red-tape to expanding housing seems like a basic win-win part of the solution.

» **Thank you for your comment. The comment is noted.**

I do not think that the aesthetics of ADUs is valid criteria for making policy decisions on par with more important impacts like region-wide housing affordability and equity.

» **Thank you for your comment. The comment is noted.**

The population boom has a major impact on transportation region wide. While changes to ADU policy may have an additional effect on certain neighborhoods, I think that it is important to recognize that this is a system of a much larger issue that goes well beyond these proposed changes. Moreover, the current zoning rules and barriers to building ADUs is not fair because it only pushes these transportation

impacts into other neighborhoods where it becomes a much larger problem than if the impacts had been more spread out.

» **Thank you for your comment. The comment is noted.**

I support anything which will allow greater density in more parts of the city. While removing barriers to ADUs will not single-handedly solve the housing crisis, it is a step in the right direction and I can see no compelling reason not to make it easier to build an ADU.

Increasing density leads to both positive and negative externalities. Failing to increase density in certain neighborhoods also has severe consequences. In both cases, zoning policies can have far-reaching effects on housing prices region wide, and artificially limiting density in some areas leads to higher housing costs everywhere.

I believe that the land-use consequences of perpetuating the unsustainable single-family zoning model in approximately two-thirds of the land in the city has a much greater negative consequences region wide than the proposed changes would have. I also think that it is not fair to push the negative externalities of growth into certain neighborhoods in order to attempt protect other neighborhoods from the impacts of the population boom.

» **Thank you for your comment. The comment is noted.**

Anonymous 48

I support the reduction of barriers to the creation of ADUs

» **Thank you for your comment. The comment is noted.**

Seattle needs more housing of all types. Encouraging the production of ADUs is one way to add more housing

» **Thank you for your comment. The comment is noted.**

Seattle needs more housing of all types. Encouraging the production of ADUs is one way to add more housing in areas zoned for single-family that is compatible with other uses of single-family areas.

» **Thank you for your comment. The comment is noted.**

Please move forward with the proposal to reduce restrictions on building of ADUs and DADUs

» **Thank you for your comment. The comment is noted.**

We need even greater changes to parking in single-family neighborhoods. I suggest a modest annual fee for a permit to park on the street in any residential area of the city. Perhaps the fee could vary based on demand.

» **Thank you for your comment. The comment is noted.**

Anonymous 49

Alternative # 1

» **Thank you for your comment. The comment is noted.**

Anonymous 50

A mandatory parking space must be required for all backyard dwellings. Too many homeowners are using these for Airbnb & VRBO income and NOT affordable housing as the City Council wants us to believe. I know, our neighbor applied for a permit under the guise of having their disabled daughter live in their newly constructed ADU. Well they lied and have started advertising it as a short-term VRBO rental.

» **Please see the frequent comment responses related to parking impacts and short-term rentals.**

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» **The comment is noted. Please see the frequent comment responses related to parking impacts and short-term rentals.**

Anonymous 51

As a home owner, I have a huge interest in building a backyard cottage. The parking requirement is particularly deterring me though. I am very in favor of removing it. My lot doesn't have on site parking at all, so I'd have to add a spot where one doesn't exist. That means either a larger structure (at high cost) or losing a lot more surface area from my back yard. Those options alone are enough to prevent me from adding a cottage.

» **Thank you for your comment. The comment is noted.**

I live within blocks of the 40, 44, 28X, and D line. I have also never had an issue in 2 years finding a parking spot around my house. Yet it is zoned single family. That is too restrictive, and the minor change of making it easier to allow backyard cottages will not have any negative impact on parking or transportation.

» **Thank you for your comment. The comment is noted.**

Let's ease the restrictions. Smaller minimum lot size, no owner occupancy, no parking requirement, less restrictions on unit access (Seattle has a ton of clean maintained alleys).

» **Thank you for your comment. The comment is noted.**

My neighborhood is full of apartments that predate the restrictive single family zoning that was later enacted. Allowing backyard cottages won't ruin the aesthetics. Even with multi unit apartments on and within a few blocks of my home in a single family zoned area, the location is still quiet, beautiful, and desirable. Backyard cottages would not harm that.

» **Thank you for your comment. The comment is noted.**

Our housing stock is woefully underutilized. Family sizes are smaller so there are less people per house, per lot. Backyard cottages would allow more people per lot without having to force people to change

their family structure. A large portion of my neighborhood is rich young childless couples (like me) and empty nesters (my neighbors). Between us we own 10,000 sq feet of property for 4 people. We should house more people in this desirable area with access to transit.

» **Thank you for your comment. The comment is noted.**

You did the study, you saw that population has decreased in a lot of single family census tracts. The utilities can handle some cottage residents, no problem.

» **Thank you for your comment. The comment is noted.**

Anonymous 52

I think the current "eight people per lot" is reasonable. So as long as the ADUs are tiny houses (rather than large developments) it can be safe to allow the current values to remain unchanged.

» **Thank you for your comment. The comment is noted.**

Since the people living in the DADUs (rather than the AADUs) are more likely to be unrelated to those in the original residence they are therefore unlikely to share a car with those in the original residence. That is why although additional parking is always recommended, only the DADUs should be required to have a parking space.

» **Thank you for your comment. The comment is noted.**

The goal of this reform is to encourage more housing so in order to maximize the living space it makes sense for residences to have the option to build both forms of ADU (lot size permitting). That said, I think that only the DADUs should be required to have an additional parking space since the people living there are more likely to be unrelated to those in the original residence (and therefore unlikely to share a car with those in the original residence). Garage space should never be counted towards gross floor area because it would be counting it as a livable space. However, my reasoning is that if it holds a car, it's unlikely to double as something like a kitchen or bedroom. As for available heights of the units, the second alternative is best; in reality height shouldn't matter unless a developer is attempting to add a four-story unit in a low rise limit (which is ridiculous). My last comment is to the requirement of the owner to live in one of the houses. This is a great idea when limiting huge scale developers, but for families just renting a property--the targeted audience of these reforms--it could become a nightmare. For that reason, the requirement for the owner to occupy the house should be removed or at least shortened to something along the lines as 'residency during the first year'.

» **Thank you for your comment. The comment is noted.**

The reforms, overall seem like a good idea. I am especially fond of how it eases the role of noncommercial parties in aiding Seattle's need for housing.

» **Thank you for your comment. The comment is noted.**

As a project designed to encourage construction of more living spaces, so long as these facilities meet the living and privacy requirements, aesthetics such as backyard coverage are irrelevant. This also means that building height and roof features don't require regulation unless they are outrageously different from the surrounding structures.

» **Thank you for your comment. The comment is noted.**

Looking into the cost is certainly an important issue. I understand that specific areas of Seattle charge more based on location, but this should simply be a project to house the in-laws or supplement to

owners' current income. Seattle as it is has a huge gentrification problem where everyplace you go allows for overcharging and a continuous raising of rent. The reforms for the ADU projects are intended to help create more housing, so shouldn't it be affordable housing? For that reason, strongly agree with a limiting system for rent (should the owners decide to rent the space). Although the owners should expect to get benefits based on the area they build in, as ADUs are only additional units, it is my strong belief that rent should not take on the value of a whole house or any value larger than that the main structure on the property. Property limitations on minimum requirements to build should be low but not inhumanely so. If eight people total are allowed per lot, the reform should only allow lots that can provide a reasonable space (in addition to that required additional parking spot).

» **Thank you for your comment. The comment is noted.**

With a growing population, public services are a must. However, as the number of residents per area will not increase drastically, public services should continue to serve on a need-based system rather than assume a huge influx of residents and therefore a greater need. The city's plans should change for the people not the other way around; the ADUs shouldn't be limited by these services.

» **Thank you for your comment. The comment is noted.**

Anonymous 53

End all barriers to developing ADU and DADU, legalize duplex everywhere. Maximize and incentivize their creation.

» **Thank you for your comment. The comment is noted.**

Anonymous 54

DADUs should not require onsite parking. Many renters I know solely rely on public transportation or rent-by-use vehicles.

» **Thank you for your comment. The comment is noted.**

Fully in support of Alternative 3

» **Thank you for your comment. The comment is noted.**

Fully support alternative 3.

» **Thank you for your comment. The comment is noted.**

Our kids are 5th generation on Queen Anne Hill and we are nearing retirement. Allowing us to build a DADU would enable us to stay in the city that we adore. Without such an option, we'll need to sell our family home since 1962 because we won't be able to afford taxes. We are heartbroken.

» **Thank you for your comment. The comment is noted.**

Strongly support alternative 3

» **Thank you for your comment. The comment is noted.**

Anonymous 55

I would be more in support of a maximum number of parking spaces, rather than a minimum.

» **Thank you for your comment. The comment is noted.**

Allow people to build homes the city desperately needs. We should be going further and allowing everywhere in Seattle to increase in density while supporting efforts to not only halt displacement, but make room for those already displaced. Invest in communities, allow them to shape their future but do not allow them to exclude people.

» **Thank you for your comment. The comment is noted.**

More density and people is good. No more single family zoning.

» **Thank you for your comment. The comment is noted.**

More homes please.

» **Thank you for your comment. The comment is noted.**

More housing, less displacement

» **Thank you for your comment. The comment is noted.**

More people to help pay = good

» **Thank you for your comment. The comment is noted.**

Yes

» **Thank you for your comment. The comment is noted.**

Anonymous 56

Lots should be allowed 2 ADU's and a DADU / Incentivize affordable rentals by eliminating development charges for units when the owners commit to holding them as a rentals affordable to people making under 60% AMI for 15 years / Incentivize green building standards / Incentivize rentals of more than one month by lowering development charges for homeowners who commit to month-plus-long rentals for at least 10 years. / Lower the minimum square footage for lots that can support DADU's and ADU's to 2500 / the ability to build ADU's should never depend on adding parking

» **Thank you for your comment. The comment is noted.**

Anonymous 57

I know more ADUs will make it harder for us to be a two car family without off-street parking and we will probably need to opt for more transit and car sharing. So be it.

» **Thank you for your comment. The comment is noted.**

I am a single family home owner. I realize that by increasing supply of housing, ADUs could in theory reduce the value of my home but believe that this danger is offset by potential to create richer, denser, and more diverse communities and combating homelessness and blight.

» **Thank you for your comment. The comment is noted.**

I support ADUs and would encourage their use throughout the city.

» **Thank you for your comment. The comment is noted.**

I think single family housing area benefit by offering ADUs because they allow for more economic diversity while maintaining a less dense feel.

» **Thank you for your comment. The comment is noted.**

The aesthetics that matter to me are keeping trees and reducing homelessness.

» **Thank you for your comment. The comment is noted.**

Anonymous 58

Support alternative 1. The parking issue is not going away anytime soon. Better public transportation helps but what if you want to go hike in the mountains? It will take a car. People are going to have cars.

» **Thank you for your comment. The comment is noted.**

Great work to support a poorly thought out solution to how to get people to new jobs due to over development of business assets.

» **Thank you for your comment. The comment is noted.**

Support alternative 1. Over time cheaply constructed housing on alleys will cause a degradation of the City's livability.

» **Thank you for your comment. The comment is noted.**

Support alternative 1. Why should residents of the City support big business's overbuilding. Jobs are created but at what cost? I don't want to subsidize developers who are responsible for these problems.

» **Thank you for your comment. The comment is noted.**

Support alternative 1. If a dwelling unit is behind a unit facing the street, it needs a fire sprinkler system as advised by the Seattle Fire Department.

» **Thank you for your comment. The comment is noted.**

Support alternative 1. I think in the long run a city will be created that people want to get out of. None of this will create affordable housing. All of this is an attempt to support the over building in the City core of office buildings. We should not be in the business of fixing poor developer business decisions.

» **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Support alternative 1. It looks like ADU's have been allowed prior to changing the Code. They need an approved fire suppression system like sprinklers as the Fire Department does not want to fight a fire from the alley. Additional housing will not be affordable.

» **Thank you for your comment. The comment is noted.**

Anonymous 59

I support working on changes in building and other codes in the city of Seattle to allow living full time in tiny houses on wheels, with no minimum size requirements.

I also support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8. Support raising maximum household size, total number of residents on site to 12

9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of

available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Anonymous 60

Alt 1 already addresses the ability to add an additional living unit, with a parking requirement, and to me is a compromise. We don't need 3 units on small urban lots, and we don't need to "look to other way" by denying the new occupants won't come with cars and walk to a bus stop (where the C line is already at or above capacity during commute times)

- » **Thank you for your comment. The comment is noted.**

Alt 1 no change

- » **Thank you for your comment. The comment is noted.**

Anonymous 61

Reducing parking will benefit the environment by encouraging folks to use alternatives to single occupancy vehicles such as walking, biking, and transit.

- » **Thank you for your comment. The comment is noted.**

Increasing density is very important in meeting our climate change goals. For this reason, we need to proceed with this planned change to City regulations.

- » **Thank you for your comment. The comment is noted.**

Anonymous 62

Of the three options Alternative 2 is the best. In order to tackle the housing problems in Seattle we need more housing and need to increase density. There is no need for off street parking and owner occupancy is unneeded.

- » **Thank you for your comment. The comment is noted.**

Anonymous 63

I am mostly in favor of Alternative 2 though I'd prefer that the following were true: decrease the minimum lot size even further (2000 sq feet?). I like the removal of needing off-street parking (my neighborhood

has plenty of street parking, for instance) and the fact that ADU and DADU users do not need to be related to the owner.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

Anonymous 64

Please vote for alternative 2!

- » **Thank you for your comment. The comment is noted.**

As my parents age, they have said they can no longer afford to retire in Seattle. I'm an only child. I need them close by to take care of them. I need to be in Seattle in order to work. By having a comfortable place for them to live close by I can take care of them and know they are safe.

- » **Thank you for your comment. The comment is noted.**

Please vote for alternative 2!

- » **Thank you for your comment. The comment is noted.**

Anonymous 65

I would urge the adoption of Alternative 2, the superior means to aggressively tackle our housing shortage and provide additional homes for individuals and families throughout the city.

- » **Thank you for your comment. The comment is noted.**

I'm excited to see the growth of our transit, bicycle and pedestrian network and am depressed to see the ongoing focus on private cars and parking in an urban area.

- » **Thank you for your comment. The comment is noted.**

Anonymous 66

Of course, none of these would be large enough to require design review. Views would be blocked with no guarantee that compatible or attractive architecture would be required. These terrible ideas should not be entertained.

- » **Thank you for your comment. The comment is noted.**

Likely the value of the property would rise and displace those who did not have the resources to build the units or who wanted to maintain some type of yard or gardening space. Many such existing spaces are AirBnBs now, which do not add to the housing stock. These would not be much larger than apartments which just today were reported to have a rising vacancy rate. Not good for socioeconomic health of the neighborhood and would encourage speculators to buy up property and thus drive up prices for the lots as they are. Seattle is a fairly health conscious city. Increased density will destroy bird and wildlife habitat, along with our canopy. Research demonstrates that being in an environment where you can hear birds and appreciate some nature positively impacts health. More density and forced living with even less private space tends to bring more noise pollution and less privacy, both contribute to stress in human beings. This is an unnecessary drive toward an imagined need for more small units.

- » **Thank you for your comment. The comment is noted.**

It is not necessary to make changes to allow more of this type of development. Seattle is already beginning to build a glut of apartments. It would not necessarily increase the type of housing that is most underserved--single family and may overtax the existing infrastructure and would lead to the destruction of even more of our canopy. Before moving forward, we need to know that there is a real need and who this would really serve. Begin by not allowing AirBnBs in residential--non comercial neighborhoods. If this type of housing is needed, ban the curent 5000+ units of AirBnB that are eating up this space.

- » **Please see Section 3.2, Planning Context, for added discussion about short-term rentals.**

Yes, likely the current infrastructure does not anticipate this degree of density and land use. Many homes would stand in the shadow of those boxy three story homes and much yard space and canopy that currently helps with shade and clean air would be destroyed. Drainage would change and less ground would exist to absorb water. Parking would be a disaster. We would become even less family friendly than we are now.

- » **Please see Section 4.5, Public Services and Utilities, for a discussion of utility impacts; Section 4.4, Parking and Transportation, for an analysis of likely parking impacts; and Section 4.3, Aesthetics, for an illustration of aesthetic impacts, including shade and shadow.**

It is not necessary to make changes to allow more of this type of development. Seattle is already beginning to build a glut of apartments. It would not necessarily increase the type of housing that is most underserved--single family and may overtax the existing infrastructure and would lead to the destruction of even more of our canopy. Before moving forward, we need to know that there is a real need and who this would really serve. Begin by not allowing AirBnBs in residential--non comercial neighborhoods. If this type of housing is needed, ban the curent 5000+ units of AirBnB that are eating up this space.

- » **See Chapter, History and Planning Context, for background on Seattle's housing crisis and Section 1.2, Proposal Objective, for discussion of the proposal's objectives. See also the frequent comment response related to short-term rentals.**

Well there seems to be no limits or requirements that short term rentals not be an option for these units. The tourists often arrive with a car. RPZs increase the cost of living for current residents. While not all adu residents will not own a vehicle, many will. Also many transit friendly neighborhoods are experiencing very full buses and there is not guarantee that the street infrastructure exists to accomodate yet even more buses. We do not need more stress around the need for parking.

- » **Thank you for your comment. The comment is noted.**

With increased density the odds of fire and emergencies increases. When buildings are squeezed too close together any fire in one is more likely to damage another. Emergency vehicles may have a more difficult time accessing the small units and be negatively impacted due to the congestion caused by so little parking and people driving around trying to find parking and their visitors.

- » **Access for the Seattle Fire Department is part of the fire and life safety review that the City undertakes for any application for development.**

Anonymous 67

Alternative 2 has my support. Alt 3 is my fallback.

- » **Thank you for your comment. The comment is noted.**

Anonymous 68

No additional parking for up to two ADUs is preferred.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is best. Alternative 3 is second best. No action is a loser.

- » **Thank you for your comment. The comment is noted.**

Anonymous 69

Alternative 2

- » **Thank you for your comment. The comment is noted.**

Anonymous 70

I could support Alternative 3. It provides the best protection for our single family neighborhoods while allowing an increase in affordable housing.

#2 would result in a proliferation of developers & investors ripping down existing dwellings and manipulating every rule to their profit advantage, while maintaining high price rentals. There MUST be an owner (or co-owner) living there for the duration.

- » **Thank you for your comment. The comment is noted.**

Seattle's Exceptional Tree rules are a joke. The definition applies to ridiculously few trees and all that is required to cut one down is to bemoan that it would make building more difficult. Our current residential canopy needs to be maintained and this is not happening. Our natural ground water runs amok and soils slide whenever we lose trees in our neighborhood.

- » **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

We must consider our tree canopy as more than an 'aesthetic' value. It is essential to human health & well being, especially in a hectic urban environment. Currently permitting up to 3 trees to be removed from a residential property every year without replacement is incredibly wrong. For builders to be allowed to cut mature evergreens and then substitute deciduous trees is also a totally unbalanced solution - there is absolutely no comparison for the amount of air purifying that takes place. Whichever 'alternative' is adopted, there needs to be requirements that trees are maintained, with a preference given to evergreens for year round benefits.

- » **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

Anonymous 71

These are probably intentionally misleading drawings - power lines and city tree codes inhibit size of trees on streets.

- » **Please see Section 4.3, Aesthetics, and Appendix C for information about the methodology used in the aesthetics modeling and analysis.**

Hi, Sorry I accidentally submitted demographics and no answers the first time, I didn't understand how it worked so it may look like I submitted it twice but I didn't.

» **Thank you for your comment. The comment is noted.**

Only rich people can afford to remodel their small house for ADA's.

» **Thank you for your comment. The comment is noted.**

Transportation needs major investment by business taxes since their employees contribute to most traffic: there needs to be subways and lite rail or even a monorail East West or North South. There needs to be more than one N/S line in Seattle and more than one E/W line to Eastside. Needs to be robust. Our current situation is not good for emergencies. We need more totally protected bike lanes and paths like the Burke Gillman. Bikes on busy city streets with green stripes but without barriers are ridiculously unsafe. An overpass for Burke Gillman missing link would be nice. People who drive on busy streets should not have to risk hitting bicyclists and feeling guilty the rest of their lives. Everyone gets in vehicle accidents now and then. There needs to be biking and local only transport streets parallel to arterials and they they need to have 15 mph speed limitsthe State rules on local speed limits need to be over-turned to do this. I have to admit I question the sanity of politicians who think housing is solved by ada's and transportation is solved by biking on busy streets and one light rail line with a bottleneck going through downtown is the answer. Surely the creative geniuses who live in Seattle or work for the University can help plan something better than this.

» **The comment is noted. The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Broader transportation policy and requirements are outside the scope of this EIS.**

High rises - 10-20 stories in a very few areas have less impact on green space.

» **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding high rise structures are not considered as part of the proposed Land Use Code changes and are outside the scope of the EIS.**

Totally misleading study leaves out best solution to housing - the best solution by far is high rises in a few areas 10-20 story such as on Greenwood Ave or Roosevelt far North, 35th Ave in South Seattle, and Central Seattle, all the ADA solutions impact our real estate value, our pleasant back yards, our birds, bees and wildlife, our gardens. Fewer people and home owners would be impacted if made high rises on a few streets, ideally at tops of hills on arterials or one street behind. Our home is our main investment and we cannot afford to redo it or move.

» **Thank you for your comment.**

My name is Kimberly Kinchen. My household is made up of two adults in a 650-sqft co-op condo on Capitol Hill. I support more housing in urban areas because it will help stall the wild increase on housing costs we have seen in this region, create more options for housing (not everyone can afford or wants to live in a single-family home), and reduce pressure to build outward instead of upward. Creating more options and fewer restrictions for so-called soft infill like ADUS, DADUS and the like also makes it easier for long-term sfh residents to stay in their homes as prices rise and property taxes increase, by providing a revenue stream. Further, because Capitol Hill has already borne the brunt of so much dense housing growth, relaxing restrictions on ADUs and the like could relax the disproportionate responsibility that my neighborhood has taken on in the current boom.

» **Thank you for your comment. The comment is noted.**

Anonymous 73

This is absurd. While I fully support affordable housing this isn't the answer. Why is there an 'OR' in the proposal. Developers have an out. They build & can pay a fee or agree to build affordable housing in different areas. Take out the 'OR,' have developers agree 100% of their units will be rent controlled for 20 yrs. & see how many developers will agree to this. They are the ones making millions. The community is left w/ dealing w/ the infrastructure of increased parking, water, sewerage & we will not see reduced rent!

- » **Please see Section 4.1, Housing and Socioeconomics, for a discussion of how the proposal may impact affordability and Chapter 2, Alternatives, for a description of what is included related to reducing costs. See also Section 3.2, Planning Context, for a discussion of additional strategies the City might consider to reduce costs and increase the affordability of ADUs. Please also see the response to frequent comments related to housing affordability.**

Anonymous 74

go with alternative #3

- » **Thank you for your comment. The comment is noted.**

Anonymous 75

Please make sure DADus and ADUs don't result in loss of tree canopy or impacts to environmentally critical areas. flexible design standards are essential.

- » **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

Please require one off street parking spot for each ADU/DADU added to a lot.

- » **Thank you for your comment. The comment is noted.**

Please do not remove the owner occupied requirement.

- » **Thank you for your comment. The comment is noted.**

Anonymous 76

I have adequate off-street parking now as I am on a corner lot with off-street parking now.

- » **Thank you for your comment. The comment is noted.**

Building such an addition is an expense I would undertake and would be able to provide additional housing in Lake City. This would help keep rents more reasonable.

- » **Thank you for your comment. The comment is noted.**

I have owned house in Lake City since 1994. I live in New Hampshire due to work requirements. My house has a 1150 square feet detached garage. I want to build 2nd floor over the garage and rent it out until I retire in 6 to 10 years at which time I would live above the garage and rent out the house. The house is already rented out. To do so I need Owner-occupancy requirements of alternative 2 (no occupancy required) . If there is concern about investors buying houses to convert them to higher density, I suggest that alternative 1 be amended to allow owners that have owned their home for some number of years

(such as 3 or 5 years) to not be required to live on property. That would prevent buyers from buying with the intent to convert properties immediately.

A height limit of 18 feet to the bottom of the roof line is needed. My property is 63 feet wide and on a corner lot. Perhaps corner lots could have increased limits since they do not create large structures in the middle of a block.

» **Thank you for your comment. The comment is noted.**

I need ability to have separate electric service for the DADU. It needs to have its own postal address. It currently shares water and waste water service with the house, so having a code that allows for these three needs is preferred.

» **Thank you for your comment. The comment is noted.**

Anonymous 77

Population is going to increase regardless of this legislation. This legislation will increase the options for housing.

» **Thank you for your comment. The comment is noted.**

I prefer Alternative 2 as it will remove the most barriers to building a backyard cottage. I see the owner occupancy requirement as a very large barrier to building a DADU which is probably most likely and preferred by many homeowners. Many homes do not have enough square footage to add an AADU and many people aren't comfortable with "sharing" their house. Adding a detached structure is a very expensive project when the future of where you are going to live is uncertain.

» **Thank you for your comment. The comment is noted.**

Anonymous 78

I support alternative 2 and 3.

» **Thank you for your comment. The comment is noted.**

Anonymous 79

Can 3,200 SF lot size be applicable to both option 2 and 3?

» **The final proposal can include any combination of the alternatives considered in the EIS. Please see Chapter 2 for a discussion of the Preferred Alternative. The Preferred Alternative includes reducing the minimum lot size required for a DADU to 3,200 square feet.**

Alternative 2 seems to be the best option although it seems arbitrary that only option 3 allows 2 AADUs. Why can't option 2 also offer that?

» **The final proposal can include any combination of the alternatives considered in the EIS. Please see Chapter 2 for a discussion of the Preferred Alternative. The Preferred Alternative includes allowing two AADUs.**

Anonymous 80

My Lower Wallingford neighborhood has been inflicted/wounded over the past several years through the massive development along streets with zoning that allows for massive apartment complexes (i.e. Stoneway, Wallingford, 45th street). In addition, the plan with the urban village will dramatically hurt the neighborhood, This proposal will just POUND the last vestiges of single family zoning in lower Wallingford out of existence. All of the negative transformation has not resulted in lower rents, just profits for the businesses that build them (then flip them), rent out the rooms at rents that I could not afford. The bottom line is that there are too many high income folks living in the area that want to live here and building MORE UNITS will not lower the rents, ONLY REDUCE THE LAST BIT OF VALUE OF THE NEIGHBORHOOD, and only after business interests take their profits, and then the cost will go down b/c the building mess created the accumulation of the city permitted action will ruin the neighborhood.

» **Thank you for your comment.**

Anonymous 81

I support option 2. Change the codes

» **Thank you for your comment. The comment is noted.**

Anonymous 82

Seattle is having enough difficulty adjusting to HALA and growth without having to deal with disappearing green belts that are provided by neighborhoods. Don't change current AADU and DADU code.

» **Thank you for your comment. The comment is noted.**

What a disaster! Looks like an urban refugee camp.

» **Thank you for your comment. The comment is noted.**

Alternative 1 is the only reasonable choice. The other 2 choices are great for developers/builders and horrible for families, neighborhoods and livable Seattle. From what I have read, most AADUs and DADUs are used to generate income through venues such as Air B&B or VRBO. They are not used to house families. Without additional off-street parking requirements, neighborhood streets become impossibly congested and dangerous. Many single-family neighborhoods do not have reasonable bus service so cars are needed.

» **Please see Chapter 3, History and Planning Context, for information added on the City's existing regulations related to short-term rentals. Please also see the frequent comment response on parking.**

Forecasting what the economics of single-family housing in Seattle will do over the next 10+ years under all 3 but particularly the last 2 alternatives is based on so much uncertainty that it provides little more than vague possibilities. The global economy could tank, lots of out-of-town buyers could buy properties as investments and let them sit vacant. On the other hand, the \$275 head tax (which I favor) could reduce corporate employment and housing demand, the increasing numbers of aging Seattleites down-sizing is adding to the number of available homes, our overdue earthquake could appear and cause a great eastward migration, etc.

Until our city government (and county, state, etc) does something meaningful to fix the horrendous traffic problem, it has no business exacerbating the problem by enticing out-of-towners to move here so

they too can store their cars on the streets. Just because the city council let developers destroy lots of low-income housing units in order to build far less affordable units, does not mean that now they can try to fix their mistake by turning single-family neighborhoods into mini-motels with parking lots for streets and small patches of green for pet toilets.

» **Thank you for your comment. The comment is noted.**

The sentence: "However, no significant unavoidable adverse impacts on land use are anticipated as a result of the proposed Land Use Code changes." sums up the city council's approach of "grow till you rot". Of course there will be significant unavoidable adverse impacts on land use under Alternatives 2 and 3.

» **Thank you for your comment. The comment is noted.**

The estimated parking availability and bus frequency times used by the city are meaningless. In fact, city code was changed to essentially state that transit times on the bus schedules are always correct. Not. True.

» **Please see the frequent comment response concerning impacts to parking.**

Anonymous 83

We don't need to put parking spots ahead of housing units. Alternative 2 is the best.

» **Thank you for your comment. The comment is noted.**

Alternative 2 is the best/most impactful. This city needs more housing. Let's make it slightly less difficult to build more housing.

» **Thank you for your comment. The comment is noted.**

I can't see any issues with choosing Alternative 2.

» **Thank you for your comment. The comment is noted.**

Seattle needs to sprinkle this development throughout the city. Don't just upzone a few blocks here and there (and make parking impossible in those areas). Allow scaled increases in density throughout the city. Only way to do this is Alternative 2.

» **Thank you for your comment. The comment is noted.**

Services and amenities become more efficient and robust with higher density. I want Alternative 2.

» **Thank you for your comment. The comment is noted.**

I would like to build an AADU and a DADU in south end of West Seattle. It would naturally be at affordable rents as the neighborhood is poorer than most other places of Seattle.

» **Thank you for your comment. The comment is noted.**

Anonymous 84

ADUs without parking should only be allowed in urban centers/villages.

» **Thank you for your comment. The comment is noted.**

I oppose Alternative 2. To reduce barriers to creating ADUs, it makes sense to remove the parking space requirement. However, increasing the number of ADUs per lot, and also excluding garage/storage in the calculations for max gross floor area, would create loopholes against the spirit of ADUs. People will build larger garages and storage, or what they can classify as such, to increase usage space to augment the max gross floor area. Also, by increasing the maximum rear yard coverage to 60% if DADU is <15 feet, that is encouraging cheaper horizontal than vertical builds. All of these negatives point to less efficient development, loss of green space, and more costs for drainage, pollution, climate change, and environmental health.

Alternative 3 is not much better, by allowing 2 ADUs. This largely benefits larger landowners, which will increase wealth inequity in Seattle. Also, larger parcels of land may not be where transit is convenient and density should be increased.

Take Alternative 1 and remove the parking requirement. Increase max gross floor area of DADUs to 1000 sf or more if you have to. Alternative 1 has been in place without causing significant issues (which is a great marker of good policy) and needs more tweaking than wholesale changes.

» **Thank you for your comment. The comment is noted.**

Charge properties drainage fees based on contributing impervious area.

» **Thank you for your comment. The comment is noted.**

Obviously green space and trees would be better, but to balance housing needs and vegetation, it would help to have Alternative 1 with modifications discussed above which is more likely to lead to dense, vertical development.

» **Thank you for your comment. The comment is noted.**

Who do ADUs benefit? Homeowners, who are less housing cost burdened in Seattle than renters. Of homeowners, who do ADUs benefit? Those with large lots, by and large. If those larger lots are in a desirable neighborhood, ADUs are going to benefit wealthier landowners. If those large lots are in a less desirable neighborhood, chances are that area is less centrally convenient and increasing density might overwhelm the local transportation network. But the bottom line is, yes, alternatives 2 and 3 might increase the housing supply, but it will also exacerbate wealth inequality in a stratified Seattle.

» **Please see Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

Well designed density would be the most efficient.

» **Thank you for your comment. The comment is noted.**

Anonymous 85

I favor a No Action Alternative.

» **Thank you for your comment. The comment is noted.**

Lot lines are already non-existent in many areas; this is not appealing. Again, this is more loss of green space.

» **Thank you for your comment. The comment is noted.**

Adding more ADUs decrease the amount of green space.

» **Thank you for your comment. The comment is noted.**

Rather than add more housing options the city should work with multifamily dwelling units/apartments/ etc on reducing housing costs.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding multifamily dwelling units are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

Anonymous 86

I support more Accessory Dwelling Units and would like to see the final EIS recommend: 1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.

2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.

3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.

5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.

6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.

7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.

8. Support raising maximum household size, total number of residents on site to 12. This also allows for people in communities that practice multigenerational living to feel included in the Seattle community as a whole.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Anonymous 87

I support Alternative 2

» **Thank you for your comment. The comment is noted.**

Anonymous 88

My name is Marina Gordon. I live in Wallingford with my husband and daughter. I want more housing because I'd love to see that a wider range of people can have access to Seattle housing similar to what I had when I moved here in 1992 and bought a home in 1993.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases unfeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.
4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing

elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.

10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.

11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Anonymous 89

Alternative 3 would encourage more parking spaces overall in the city, which is counterintuitive with the changes the city is making to encourage mass transit and biking in lieu of car use. Alt 3 would increase the number of ADU's while requiring additional parking. I am strongly opposed to Alternative 3.

- » **Thank you for your comment. The comment is noted.**

The extra off street parking space requirements needs to go. We don't have the space on the street. We need to go with Alternative 2.

- » **Thank you for your comment. The comment is noted.**

I will do my own little part to help alleviate the housing crisis by building a DADU cottage if Alternative 2 passes. But I can't if Alternative 3 passes. Alternative 2 should be passed with no revisions.

- » **Thank you for your comment. The comment is noted.**

My preference is Alternative 2. I would love to build a backyard cottage so my family can share our home with another family (and will if this option passes). However, to invest the several hundred thousands of dollars to do so, I need to know that we can recoup that investment when we someday sell. The owner occupied requirement will limit the interest from future buyers and it is exceedingly difficult to find a reasonable bank loan if this limit is in place.

- » **Thank you for your comment. The comment is noted.**

The report makes it clear that there would be more housing created in Alternative 2 while keeping housing affordable. Given our lack of housing, supporting Alternative 2 seems like a no brainer.

- » **Thank you for your comment. The comment is noted.**

Providing more living space is the only way we can reduce our housing shortage, just like you reduce a food shortage by importing more food.

- » **Thank you for your comment. The comment is noted.**

Anonymous 90

Don't require added parking for DADU/ADU units! The young people who are going to move in there are unlikely to own cars, ever. Car sales are plummeting in the urban US. Self driving cars and ride share will start to take care of our parking crises around the time that these ADUs go into effect, so prioritize people over parking.

» **Thank you for your comment. The comment is noted.**

Alternative 2 is the best way to keep this city from becoming completely unaffordable and non diverse. San Fran's culture has been completely eroded by the rich and the tech bros. Let's prevent that here!

» **Thank you for your comment. The comment is noted.**

Alternative 2 is the best way to keep this city from becoming completely unaffordable and non diverse. San Fran's culture has been completely eroded by the rich and the tech bros. Let's prevent that here!

» **Thank you for your comment. The comment is noted.**

ADUs are so much better (and affordable) than high rises!

» **Thank you for your comment. The comment is noted.**

Anonymous 91

I think this is a major concern as the cosmetic of Seattle will be negatively impacted by these boxy new builds. Seattle's traditional neighborhoods and streets that have been a staple for many communities will be ripped (literally) apart by homes on postage stamp size "lots." Where will all the kids play? In the streets?

» **Thank you for your comment. The comment is noted.**

Unfortunately parking is already a major challenge and increasing density will create an even bigger challenge.

» **Thank you for your comment. The comment is noted.**

I don't believe these codes need to be relaxed as it relates to ADU's or backyard cottages. Simply put, revising these zoning restrictions will compromise the lifestyle that manner homeowners originally purchased into. Many folks (including myself) purchased a home because of it's SFR zoning and enjoy lighter traffic, parking availability, and space. Allowing for higher density negatively impacts traditional Seattle neighborhoods.

» **Thank you for your comment. The comment is noted.**

Many homeowners are faced with challenging situations as the cost of living in Seattle has increased. The potential of higher priced real estate surrounding them could make paying their (increased) property taxes unattainable.

» **Thank you for your comment. The comment is noted.**

Seattle clearly has a growing population - knowing this, it's important to avoid growing in the wrong ways. Rather than adjusting land use codes for SFR's, why can't there be affordable options to buy into

condo's (versus all the apartments). There should be conversation releasing developers of liabilities with condominium projects.

» **Thank you for your comment. The comment is noted.**

Many Seattle neighborhoods don't even have an option to connect to the City's gas line - our infrastructure is not setup to handle the stress of a higher capacity of usage.

» **Thank you for your comment. The comment is noted.**

Anonymous 92

Anything other than option #1 is going turn our City into a trashpile of outsourced rentals with zero accountability.

» **Thank you for your comment. The comment is noted.**

Anonymous 93

Overall, alternative #2 seems to be the most effective option to reduce barriers to the creation of ADUs. The FAR requirement in alternative #3 seems particularly restrictive and against the objective of this revision process. Taking no action (alternative 1) will result in excessive regulations on parking that have no positive impact on the street parking situation as demonstrated in this survey data.

» **Thank you for your comment. The comment is noted.**

Anonymous 94

My name is Michael Nash. My household is made up of myself and my wife. I live in District 5. I want more housing because we are currently rent-burdened and considering having children soon. I have friends who are also rent-burdened or homeless. Allowing more people to move to Seattle can help reduce climate change.

I support more Accessory Dwelling Units and would like to see the final EIS recommend:

1. Freedom to choose best fit and type when creating accessory dwelling units. Allowing owners to make two accessory dwelling units either both as attached to the primary dwelling or one attached, one detached, or both in a detached structure, in front or to side of primary residence. Flexibility is key, as long as the overall form fits within the bulk of currently allowed Single Family Zoned structures.
2. Elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary, and in many cases infeasible. This will prioritize vegetation and open area over vehicle storage.
3. Striking the owner occupancy restriction. Owners of Seattle backyard cottages surveyed by OPCD stated the greatest barrier to creating a DADU was the owner occupancy requirement. Both Portland and Vancouver do not have owner occupancy requirements and have not experienced widespread problems with speculation. Both maintain high percentages of owner occupancy without need for regulation. Finally, the underlying rationale that renters or landlords are not adequately invested in their communities is an outdated and classist prejudice, especially considering the majority of Seattleites are renters, and that there are very few new opportunities to own. Seattle's houses are filled with renters (27%) and Seattle's Single Family zones are filled with thousands of grandfathered lowrise multi-dwellings.

4. Elimination of minimum lot size for ADUs. If you can put a house on it, you should also be able to create an ADU by right, within the same bulk restrictions allows by the zone. Fourteen percent of Seattle lots fall below the current lot size threshold and they are often in neighborhoods with the best access to transit, schools, parks and jobs, exactly where most people would like to live.
5. Increasing the allowed gross floor area for detached accessory dwelling units for 1000 square feet and attached dwellings units to 1500 square feet. This small increase will lead to more two bedroom plus dwellings for the larger Seattle households. Separating non-livable space from the accessory dwelling unit's gross floor area calculation will increase the number of dwellings that can be constructed on top of or adjacent to existing garages by allowing for more flexibility on constrained sites. Requiring occupancy separation and separate entrance to living and storage spaces would reduce illegal conversions.
6. More allowable rear yard coverage. Having increased rear yard coverage allows additional flexibility in design, to preserve trees, yard space, or existing accessory structures.
7. Incremental increases in size and height allowances and options for roof features such as dormers and green roofs. These cottages are still 10 feet shorter than what is allowed for the primary residence.
8. Support raising maximum household size, total number of residents on site to 12
9. Do not apply Mandatory Housing Affordability. Many of the ADUs we have are used for family, or rented well below market. Adding a potentially five figure fee at their creation for affordable housing elsewhere would drastically reduce the ability of everyday people to make their own contribution to affordable housing on their own land.
10. Reducing pre-development costs and streamlining permitting by dedicating specialized reviewers to ADU/ DADU projects. With three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots, residents who want to build an ADU have a clear and predictable pathway through permitting.
11. Studying how limiting new principal structures to .5 FAR can incentivize the creation of additional attached and detached accessory dwellings, and limit displacement/ demolition/ gentrification. Additional FAR bonuses for green building, specific site conditions such as alley and corners should also be a component of this study.
 - » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see the response to the form letter included in Section 5.5.**

Please choose alternative 3 to allow the most ADUs to be built.

- » **Thank you for your comment. The comment is noted.**

Anonymous 95

I support the loosening of regulations on building DADUs/ADUs. I think the population will benefit and impact will be mostly positive.

- » **Thank you for your comment. The comment is noted.**

YES!

- » **Thank you for your comment. The comment is noted.**

Anonymous 96

I think the requirements on parking should be eased and there should not be requirements that single family homes, DADUs, or AADUs, require preservation of parking. At least in our neighborhood, there is sufficient street parking. Also, less parking may cause people to drive less, which would be a plus. This should be mitigated with increased funding for mass transit or bicycle infrastructure. (E.g. condition the grant of a waiver of a parking place requirement on a one-time \$500 fee dedicated to bicycle infrastructure.)

» **Thank you for your comment. The comment is noted.**

We already have a mixed type architecture in the City. I prefer alternative 3, and then 2, in part because this may decrease the number of "tear downs" in the City. What I do not like, are blocky new construction homes that completely fill the building envelope and dwarf their neighbors.

» **Thank you for your comment. The comment is noted.**

The rules should be amended so it is easier to put up DADUs and AADUs.

» **Thank you for your comment. The comment is noted.**

I am hopeful that the creation of more DADUs and AADUs will ease our affordability and homelessness problems.

» **Please see Section 4.1, Housing and Socioeconomics, for a discussion of how the proposal may impact affordability.**

I support alternative 3, and 2, in that order of preference. I want the City laws to be changed so that it is easier for property owners, like our family, to permit and build AADUs and DADUs and to increase the number and variety of housing choices in single-family zones, like the one where we own our home. I think this is totally doable and will be a positive change for our community.

» **Thank you for your comment. The comment is noted.**

Anonymous 97

This study is very one sided and unrealistic.

» **Thank you for your comment. The comment is noted.**

Alternatives 2 and 3 are completely insensitive to the discourse related to the initial proposal. Current traffic and utilities will not support the proposed action nor the alternative. Do the work, review block by block for expansion of ADUs or DADUs or choose alternative 1 until sufficient time and planning can occur for more controlled growth.

» **Please see the frequent comment response regarding individual neighborhood review.**

Our aged sewer lines are simply not up to par and would require extensive costs and will take years to update. This work would need to be completed prior to passage of the new zoning.

» **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems.**

Expectations of this study are unrealistic for 10 year scenarios and beyond.

» **Thank you for your comment. The comment is noted.**

Parking on Queen Anne is not as sparse as shown in the studies and the 10-year scenario is unrealistic with alternative 2 or 3.

- » **Please see the frequent comment response concerning impacts to parking.**

Construction downtown has not included sufficient affordable housing due to the low penalties for new construction. The low fees allowed developers to build high-end homes without affordable and only raised the prices for the high-end homes. Taking it out on the urban villages is not called for and a better plan for growth must be considered.

- » **The proposal evaluated in the EIS is related to proposed changes to the Land Use Code for the construction of ADUs in single-family zones. Changes within urban villages are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

City planners are only concerned about affordable housing but not willing to do the work to better control growth. There should be a campaign to enlist community counsels to review and assist with planning.

- » **Thank you for your comment. The comment is noted.**

Anonymous 98

Please reduce the barriers

- » **Thank you for your comment. The comment is noted.**

We need denser neighborhoods

- » **Thank you for your comment. The comment is noted.**

We need density, and developers should pay impact fees toward schools & services

- » **The proposal evaluated in the EIS is related to proposed changes to the Land Use Code for the construction of ADUs in single-family zones. Impact fees are outside the scope of this proposal.**

Idk

- » **Thank you for your comment. The comment is noted.**

Who cares, cars should be less convenient

- » **Thank you for your comment. The comment is noted.**

Anonymous 99

My preference is alternative 2, second choice of 3.

- » **Thank you for your comment. The comment is noted.**

I like that houses will be kept and converted to have multiple AADU

- » **Thank you for your comment. The comment is noted.**

I have few comments. With a big lot and facing up-zoning in my Urban Village, I will build tastefully and try to blend in with both my McMansion neighbor to one side, and whatever boxy LR-1 that will rise up to the other.

» **Thank you for your comment. The comment is noted.**

Alt 2 is best. It is important to make the process easier, to allow larger DADUs, and to allow both an AADU and a DADU on a property. It is so expensive to live in Seattle that owners may need the extra income and additional ADUs will help with the housing crunch. More unrelated people if there is both an AADU and a DADU.

Do not impose MHA if both an AADU and DADU.

The 1000 SF allowance should NOT include storage and garage.

» **Thank you for your comment. The comment is noted.**

Like all my neighbors in an Urban Village where parking will NOT even be REQUIRED, I am upset about the issue. We already have spillover from apartment complexes and townhouses.

As long as the City does NOT put in sidewalks -- or require us who develop ADUs to do so -- then maybe we can park perpendicularly to the road when the roadway is sufficiently wide. Where I plan to develop my AADU/DADU, there is already a sidewalk across the street, so please do not require me to spend a lot of money putting a sidewalk in front of my property.

The Alt 2 DADU can have a garage and enough house size for 2 bedrooms. Please allow the 1000 SF to exclude the garage and storage area!

» **Thank you for your comment. The comment is noted.**

I have few comments on this subject. I live in an Urban Village with a 11,000 sf lot. Easily accessible to North Seattle College, Ballard and Downtown. Probably will rent to students or workers taking the D Line downtown.

» **Thank you for your comment. The comment is noted.**

I have few comments on this subject. I live in an Urban Village with a 11,000 sf lot. I expect and somewhat welcome the densification.

» **Thank you for your comment. The comment is noted.**

I am worried about the sewer and water supply lines. If I have an AADU and a DADU will I have to have a 6 inch sewer line? And a 1" or more water line?

How do all the utilities get to the DADU?

What about firefighter access to a backyard DADU? I plan to have a driveway to the Alternative 2 garage and its 2 bedroom 1000 SF living space.

» **Please see the frequent comment response concerning impacts to the water, drainage, and sewer systems. Access for the Seattle Fire Department is part of the fire and life safety review that the City undertakes for any application for development.**

Anonymous 100

Do not require parking for ADU, whether on- or off-street.

- » **Please see Chapter 2 Alternatives for a description of the Preferred Alternative. The Preferred Alternative would eliminate the off-street parking requirement for ADUs.**

Do not require parking for ADU, whether on- or off-street.

- » **Thank you for your comment. The comment is noted.**

Remove all parking requirements from ADUs.

- » **Thank you for your comment. The comment is noted.**

Do not let 'aesthetics' perpetuate the housing crisis.

- » **Thank you for your comment. The comment is noted.**

Increase density throughout the entire city.

- » **Thank you for your comment. The comment is noted.**

Anonymous 101

It would be nice if there was some way to have DADUs be constructed in a similar style to their neighborhood homes, instead of having, for example, boxy structures stuck amongst mostly bungalow or Craftsman style homes.

- » **Thank you for your comment. The comment is noted.**

I think getting rid of the requirement for parking for an ADU/DADU is reasonable, especially given that the city is currently permitting apartment/condo buildings that are *not* required to provide one space per unit (I'm aware of several multi-unit, multi-story projects either recently built or under construction that provide residential parking spaces for less than 1/2 the number of units in the building). ADUs built in single-family neighborhoods will not significantly push more cars to park on the street. If potential renters are able to live closer to where they work, especially near transit, they may not want to drive a car anyway.

- » **Thank you for your comment. The comment is noted.**

My family lives in North Capitol Hill, in an area of single-family homes (except for the old time apartment buildings that are evidence of previous zoning rules that allowed multi-family dwelling). We moved to Seattle in 2005, and even then the price of housing here made my jaw drop. There are not a lot of affordable options IN the city, and it continues to get worse as prices rise. I would like to see the ADU/DADU rules changed to make it easier to build these units for several reasons: to allow multi-generational living more easily, to allow housing diversity beyond the boxy townhomes popping up in many areas, to allow more affordable housing for renters looking to live close-in to their jobs and thereby take more traffic off our roads (if renters use transit, bike, or walk), to allow homeowners to supplement their incomes while at the same time providing solutions to enable families without insane amounts of money to live in nice neighborhoods. If Seattle is serious about addressing affordable housing, not to mention the added side benefit of rectifying some of its shameful history of redlining residential neighborhoods to the detriment of families of color, the changes to the ADU/DADU rules are a good start.

- » **Thank you for your comment. The comment is noted.**

I support Alternative 2. It seems the most reasonable approach to me.

» **Thank you for your comment. The comment is noted.**

ADU/DADUs seem to me to provide one alternative to making housing more affordable in some of the more expensive neighborhoods in the city, which seems like a good idea. Additionally, if later in our lives we no longer want/need the size of home we have, it would also be nice to be able to move into an ADU/DADU on our property (if we build one) and rent out the house in our retirement years without being forced out of our home due to lower income in retirement.

» **Thank you for your comment. The comment is noted.**

Anonymous 102

Permits drag the timeline and financial viability of the project for most individuals considering building a DADU. Please allow a more speedy processing time and a lesser number of corrections on permits. Also, time during correction cycles takes way too long! Maybe permit sets could be pre-approved pending that the last bits of final corrections are approved, allowing the architect to start ahead on bids, site and foundation work.

» **Thank you for your comment. The comment is noted.**

Dropping the parking requirement is critical to give a legitimate incentive for individuals to build DADU on their lots. Hopefully, this initiative can also give a long term incentive for the city to build more public transportation since density in some areas will increase due to the construction of DADUs.

» **Thank you for your comment. The comment is noted.**

Alternative 2 is best suited given the housing crisis in Seattle

» **Thank you for your comment. The comment is noted.**

Allowing the owners to not live on the lot on which they build a DADU would allow more owners to consider building a second home for someone else.

» **Thank you for your comment. The comment is noted.**

Allowing for 1,000 SF would allow a family to comfortably live in a DADU.

» **Thank you for your comment. The comment is noted.**

Anonymous 103

I have two concerns related to the lack of requirement for on-site parking.... I know studies were done showing the percent of current use of on-street parking and showing there was room for more cars on the streets so in essence justifying that when ADUs are added to a property that they do not have to provide on-site parking. This type of research does not take in to account pedestrian safety or the increased car break-in crimes in the whole city. I live in NW Seattle where there are no sidewalks. When all of the cars are parking on the street, that puts the pedestrians out in the street. With cars parked on both sides, there is not enough room for two cars to pass in either direction and for pedestrians... and/or strollers and bicycles which is already dangerous. The cars park so close to the intersections it is impossible to see on-coming traffic when you are trying to turn. In addition, having more cars on the street provides more opportunity for auto break-ins in a city that is battling opioid addiction and increased crime. Putting more cars on the streets makes this worse!

I know the city is encouraging Seattleites to get rid of their cars so they think not requiring on-site parking is okay.... I think the idea that Seattleites will get rid of their cars is also unrealistic. People typically move to Seattle not just for their jobs but because they like the outdoors. They like to hike, ski and boat which all require a vehicle. They might take public transportation to work but they have cars for the weekends. Uber and Lyft are not going to take people to the trailheads or up skiing. I know the city is trying shuttles to get people to trailheads... the reality is.... most true hikers will avoid those hikes because they will have too many people. Shuttles will be good for a few but not the majority of hikers... or skiers.

Please take these factors in to consideration in the environmental impact studies.... and require on-site parking....

I also am bothered by buildings being built that do not fit in to the neighborhood architecture.... I hope there will be stronger requirements for design review and that the architecture should blend in with the existing structure and neighbors. I have seen too many tall boxes that loom over smaller neighboring houses blocking their light and making it impossible to garden other than a shade garden.... and offer no pleasant architecture.

- » **Please see the frequent comment response concerning impacts to parking.**

Anonymous 104

ADUs will contribute to higher densities, which will allow for better transit service. This is the only real way to improve Seattle's transportation system.

- » **Thank you for your comment. The comment is noted.**

As someone who grew up in and still lives in Seattle's single family neighborhoods, I would like to say that any change in the character of the neighborhoods is minimal and unimportant.

- » **Thank you for your comment. The comment is noted.**

Cities have buildings in them. More buildings won't have a negative impact on that.

- » **Thank you for your comment. The comment is noted.**

Please expedite the implementation streamlined ADU regulation. This city has a housing shortage. That concern is more important than any other.

- » **Thank you for your comment. The comment is noted.**

Whatever concerns exist regarding utility services, they should not be used to restrict ADU construction.

- » **Thank you for your comment. The comment is noted.**

Anonymous 105

As a homeowner in an area zoned SF7200 (Pinehurst neighborhood) I have the luxury of a small house on an 8000 square foot lot. I have two goals in commenting on this proposal. The first goal is to encourage more dense housing in Seattle generally and in my Northgate/Lake City area particularly. The second goal is to allow me to reasonably construct a DADU backyard cottage on my own property sometime in the next 5-10 years. In that time, I will want an option to house my parents, or my children, or use it as rental property.

Other people more knowledgeable than I will comment on the broad implications of the various ADU specifics, I am going to say only a few things that affect my personal decisions. I realize that my comments are only anecdotal, but they may be representative of Seattle homeowners generally.

Regarding parking requirements. Given the layout of my lot, adding additional parking and a proper driveway into the rear of the yard will absolutely prohibit any DADU development. I live in an area that's easy walking distance to two roads (15th Ave NE, Lake City Way) that well-served by public transit and so there's no need for the city to insist on storage for a privately-owned vehicle. Current zoning for parking requirements is based on transportation patterns of fifty years ago, and to assume that those patterns will carry forward even ten years into the future is insane. On my lot, a parking requirement would dramatically increase the cost of adding any structure, to the point that I will abandon thinking about it at all.

The lot size requirements restrict flexibility in building structures. My own lot has quite a few trees, and I would prefer to maintain as many as possible. For that reason, I would prefer as few predefined "aesthetic" restrictions on the building as possible. Each additional restriction means additional constraints, and likely, additional costs. For me, building a DADU will be affordable if I can use stock plans and as much prefabrication as possible, which means I need the regulations to be flexible to fit what I can afford to do.

As for other issues, I'd prefer to see the owner occupancy restriction relaxed. I certainly have no objection to having neighbors who are partly or wholly renting their houses or backyard cottages. My neighborhood adjoins a quite a lot of apartment buildings along 15th Ave NE and along Lake City Way, and owner occupancy is just not a problem.

- » **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.**

Please discard as many parking requirements as possible, and let the city evolve with alternative transportation patterns.

- » **Thank you for your comment. The comment is noted.**

Anonymous 106

Not much to comment about parking here. However as a cyclist for both commute and errands I would love to see continuous improvements in the biking infrastructure. Adding more density should make those investment have a higher return. Higher density also makes high frequency transit more feasible. I live in Magnolia and we don't have a single 10 or 15 minute line. I hope that the added density would make it possible to implement a 15 minutes line through the center of Magnolia.

- » **Thank you for your comment. The comment is noted.**

I'm really excited to see that these changes are being considered. I'm really looking forward to build a DADU in my backyard. I will then be able to move into it while I remodel my main house to add an ADU in the basement. I think that this is the right thing to do for the city and that this is a gentle way to increase density without impacting the charm of the city.

- » **Thank you for your comment. The comment is noted.**

I'm a strong supporter of Alternative 2. It seems to provide the most options and makes it the most likely that ADUs will be built. As a property owner looking forward to start my Backyard cotage project, this would definitely enable me to execute on my vision with minimal barriers. I would also expect that Illegal

ADU would be less common under these new rules. A couple of things that I would change would be, first take from Alternative 3 regarding the number of ADUs. You can either have 2 AADU or one AADU and one DADU.

» **Thank you for your comment. The comment is noted.**

Nothing surprising here this is bound to happen with bigger structures that are required in order to increase density. I think all options are acceptable for this section.

» **Thank you for your comment. The comment is noted.**

As a owner of a Parcel D in a Higher price neighborhood, Option 2 incentivizes me to do the "right" thing by creating the most hosing and help control price increase while generating good rental income.

» **Thank you for your comment. The comment is noted.**

No comment here except for the fact that DADU should be able to use the same sewer line and water supply line as the main house.

» **Thank you for your comment. The comment is noted.**

I was mostly interested by the tree canopy question here. I think that there should more incentive to either plant more/replace trees that have to be removed for the construction of DADU. I would also like to see more incentive for green roofs. Maybe provide a slightly larger coverage for a verified green roof.

» **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

Anonymous 107

Option 2 - Removes the barrier for owner-occupancy properties to create an ADU on their property can provide more affordable housing.

» **Thank you for your comment. The comment is noted.**

I supports option 2

» **Thank you for your comment. The comment is noted.**

Lift this regulation will provide more affordable housing.

» **Thank you for your comment. The comment is noted.**

Anonymous 108

We need RPZ along the entire C-Line, as non-residents park in front of our buildings and older homes (without adequate indoor parking), and clog up the streets as much as five blocks in either direction.

» **The proposal evaluated in this EIS concerns proposed changes to the Land Use Code for the construction of ADUs. Implementation of specific Residential Parking Zones (RPZs) is not considered as part of the proposed Land Use Code changes and is outside the scope of this proposal.**

Anonymous 109

The city should adopt Alternative 2, with no owner occupancy requirement. Currently, Seattle has lots of single-family houses that are rented out whole. Obviously, there is no owner living on site at these rentals. This hasn't been a problem. The owner occupancy requirement addresses a problem that does not exist.

» **Thank you for your comment. The comment is noted.**

In most cases, requiring an off-street parking space will require an additional curb cut. This is undesirable because having more cars driving across the sidewalk impairs the walking environment. Furthermore, the extra curb cut usually eliminates one on-street parking space, so there is often no actual increase in parking. I urge the city to adopt Alternative 2 in order to avoid this outcome.

» **Thank you for your comment. The comment is noted.**

My name is David Thaler. I am a renter in the Montlake area. In the last 6 years, my rent has increased about 63%, but my income has not gone up anywhere near as much. We need more housing in Seattle and that need is urgent. The need for more housing should take priority over other considerations (parking, etc.), because the current housing shortage and the resulting rent increase is impoverishing the working class and driving much of the increase in homelessness. The city should adopt Alternative 2 because it will produce the most additional housing.

» **Thank you for your comment. The comment is noted.**

We really need more housing

» **Thank you for your comment. The comment is noted.**

Seriously, more housing. No time for aesthetics when hundreds of seattleites are homeless.

» **Thank you for your comment. The comment is noted.**

Most of the city is single family zoning. This could bring more density to those areas.

» **Thank you for your comment. The comment is noted.**

No more parking.

» **Thank you for your comment. The comment is noted.**

Anonymous 110

The City should provide incentives, like property tax exemptions, to homeowners to encourage them to build ADUs and DADUs.

» **Thank you for your comment. The comment is noted.**

Anonymous 111

Allowing dormers just makes sense. Approved in both alternatives.

» **Thank you for your comment. The comment is noted.**

19% of existing detached one-unit structures are already renter occupied? Why should a DADU/AADU require the owner live there for 6 months? What type of owner is this geared towards that would have the option to live elsewhere for half the year, maybe say when it's cold?

» **Thank you for your comment. The comment is noted.**

Alternative 2 is built to fail. Therefore, I hope for the progression of diversifying away from single-family zoning, an increase in ADUs is a practical first step. I am in favor of either Alternative 2 or 3. Both will take that step.

» **Thank you for your comment. The comment is noted.**

33% of single-family homes are currently in plots smaller than the minimum sized for SF5000, which prohibits subdivision of existing large lots. Minimum size for proposed ADU is for lots of 3,200sqft. Why not make a zoning for SF3200?

» **The proposal evaluated in the EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to regulations regarding subdivisions and minimum lot size requirements for single-family zones are outside the scope of this proposal.**

"Your answer" as the type field is directed as provoking the commentor to come up with the solution. "Your comments" would be more apt when requesting public comment. Similarly, your graphic at the header shows these box homes indicating that's what the neighborhood will look like with an AADU/DADU. Beauty of these construction is that they would be geared towards existing properties. Another slight design cue against the proposed alternatives 2 &3 provided in this study.

» **Thank you for your comment. The comment is noted.**

Alternate option in lieu of parking space could be covered bike storage. Rather than the city tax ADU creation, why not subsidize Orca Cards for ADU renters? If decreasing cars is the desire, increasing public transportation usage will help provide an alternative.

» **Please see Chapter 2, Alternatives, for a description of the Preferred Alternative. The Preferred Alternative would eliminate the off-street parking requirement for ADUs.**

Anonymous 112

Cars are reality, so too our buses walking, and light rail. All need to be considered and to some extent supported. Option 3 represents best plan for this necessary diversity.

» **Thank you for your comment. The comment is noted.**

I support option 3 or it's capacity to increase the housing stock in a manner that is closer to being sustainable by our existing infrastructure, and attend to significant issues regarding livability for those already in these neighborhoods and those who wish to join them

» **Thank you for your comment. The comment is noted.**

Serious attention needs to be paid to the issue of tree canopy and global warming warming. It astounds me that up till now the city's government appears to be paying very little attention to either issue. Trees can't speak, but our children can and we'll have a lot to say if our city government continues it's hypocritical course.

» **Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.**

Anonymous 113

Please relax parking requirements.

- » **Thank you for your comment. The comment is noted.**

Adu's are small so the scale is not an issue. New mega houses are the opposite.

- » **Thank you for your comment. The comment is noted.**

Higher density please.

- » **Thank you for your comment. The comment is noted.**

More housing options please.

- » **Thank you for your comment. The comment is noted.**

Please go with option 2

- » **Thank you for your comment. The comment is noted.**

Not applicable

- » **Thank you for your comment. The comment is noted.**

Anonymous 114

Overcrowded lots are not appealing. They look overcrowded. It feels claustrophobic. There is no parking and apparently you will not mandate enough provided parking.

Why does the City Council allow oversized mega-homes to be built after an average or small house is torn down, dwarfing and darkening the homes around it?

This is okay, but I cannot live peacefully in my single family home??? The destruction of traditional northwest homes for the mega-box monstrosity is what you should focus on.

No one needs this sort of space unless they have a large family. Just because someone has money, it should not exempt them from responsible land use.

Why you want me to live crowded in around multiple other homes while you allow this sort of egregious and excessive hogging of land for the sake of being decadent, is beyond me.

Can you please explain this?

The quality and character of Seattle neighborhoods, which have defined our city, is being eroded, and all you want to do is cram more houses in?

Why not halt the destruction of scaled duplexes and triplexes, which the average person can afford, and allow lower and middle income Seattleites the ability to continue living in their homes?

Halt the destruction of average size home for mega-homes. Take care of the average person instead of the rich, you are chasing around with your tongue hanging out.

- » **Please see Chapter 2, Alternatives, for a discussion of the Preferred Alternative. The Preferred Alternative includes a floor area ratio (FAR) limit that would limit the size of new single-family homes.**

I am opposed to these actions.

Regulatory barriers were placed for a reason. Making these changes removes safeguards for keeping our neighborhoods as they were designed, SINGLE FAMILY HOUSING. This is what I worked hard for a paid for and chose to live in 24 years ago.

I do not like the presumption of the City COuncil that they can impose something different upon me.

Instead control growth and deal with our current issues related to rapid growth.

You have already shown yourself incompetent and unwilling to listen to citizens you serve.

» **Thank you for your comment. The comment is noted.**

I don't want these ridiculous home values that tax long standing homeowners out of their homes so newcomers can crowd us out.

I am born and raised here and am tired of being treated like a second class citizen.

There is a definite feeling of hostility towards Seattle natives and those of us over 40.

Age discrimination is a real concern.

» **Thank you for your comment. The comment is noted.**

I like my large lot and enjoy it immensely.

I worked for it and paid for it.

I did not work for and pay for overcrowded neighborhoods and no parking.

I am tired of the City Council, who gladly and aggressively collects my tax dollars, to then guilt me into thinking I don't have a right to live in the city I grew up in, in some level of comfort, able to move about freely and park my car.

» **Thank you for your comment. The comment is noted.**

Once again, deal with the current deficits in service and then consider making things worse. There has been no actions by the Seattle City Council that have proven you are worthy of trust, increased funding or any other major decision making responsibilities. Listen to your constituents and quit forcing your personal agendas down the citizens of Seattle's throats.

» **Thank you for your comment. The comment is noted.**

What you have done to parking in my city is ridiculous. There is no decrease in car ownership and usage. According to studies the only group using more transit is under 40 year olds.

So now you can add age discrimination. to your list of blunders. You should respect those of us who drive, pretty much everyone. Road diets and eliminating parking haven't stopped people from driving. Mass transit is grossly inadequate.

Instead of improving it you have simply chosen to change the definition of buses being timely, etc.

Despicable. You should be ashamed.

So rather than creating traffic problems where we idle cars for prolonged periods of time, why not improve traffic flow and get people moving. And stop blowing exorbitant amounts of money on bike lanes, sharrows and the like. This farce has been exposed and blown wide open. For the small minority who do ride bikes, there are plenty of bike lanes. Stop now!

- » **Please see the frequent comment response concerning impacts to parking.**

Anonymous 115

I prefer Alternative 2 or Alternative 3. I think they both strike a balance between those that prefer to keep their neighborhoods as is and those that to be part of increasing the housing supply. I particularly like that single family homeowners can be part of adding to the housing supply and get the revenue from doing so. I have been following what has happened with Portland ADUs and what is happening with California ADUs, and most of that appears to be quite positive.

- » **Thank you for your comment. The comment is noted.**

It seems logical that increasing the supply of ADUs will create more naturally affordable housing. It may take a few years for this to happen. In particular, it may take a few years for ADU design & construction itself to become affordable and for credit unions to create the loan products that finance ADU construction.

- » **Thank you for your comment. The comment is noted.**

Anonymous 116

I strongly support reducing and eliminating parking requirements. The City is building light rail and bike lanes. Making new housing contingent on additional parking spaces doesn't make sense in a densifying city with increasing transit options.

- » **Thank you for your comment. The comment is noted.**

Accessory dwelling units are desperately needed in Seattle to provide more housing and also more ways for people to afford to own a home. I support reducing restrictions and eliminating hurdles to DADU and ADU construction.

- » **Thank you for your comment. The comment is noted.**

I strongly support Alternative 2. That option does the most to increase flexibility. I know from experience that current standards only allow the development of extremely small living units, and that if they are units on 2 stories they are forced to have very low ceiling heights. I applaud the changes that would allow slightly larger sizes with slightly higher ceilings. This is critical for supporting long term residence and multi-generational living. I also appreciate the reduction in parking requirements. With light rail expanding through our city it makes sense to reduce

parking requirements. Streamlining permitting would also take a major hurdle out of the process, and facilitate building more permits faster. I also applaud the move to allow both a DADU and an ADU on the same site, and eliminate the owner occupancy requirement. Allowing more units to be built in single family neighborhoods is a way to increase density while also reducing the economic incentive to tear down older small houses that give neighborhoods their charm.

» **Thank you for your comment. The comment is noted.**

ADU's and DADU's are greatly needed to increase density in Seattle's single family neighborhoods and improve affordability. They can also be a way to keep families together through multi-generational living. I strongly support Alternative 2 because it does the most to increase design flexibility and reduce permitting hurdles for accessory dwelling units. In the future I would like to see even larger DADU's allowed. In SF 7000 areas of the city larger backyard cottages would make a lot of sense and do even more to improve housing affordability by making small homes that could be large enough for more types of renters.

» **Thank you for your comment. The comment is noted.**

I strongly support Alternative 2 because it does the most to allow increased density in single family zones. We have a crisis of affordability in Seattle, and the only way to solve it is to construct more housing. ADU's and DADU's are comparatively inexpensive to construct, and do not require demolishing charming older homes. I applaud the City's efforts to reduce hurdles to constructing as many accessory dwelling units as possible.

» **Thank you for your comment. The comment is noted.**

I strongly support Alternative 2. DADU's and ADU's have very little impact on neighborhood aesthetics while at the same time allowing more housing on existing single family lots. This reduces the economic incentive to tear down older homes and build tall grey boxes, and means that the charming character of our single family neighborhoods can be retained while also increasing density.

» **Thank you for your comment. The comment is noted.**

Anonymous 117

I oppose the proposed changes which I feel will further erode Seattle's single family neighborhoods. Density should be placed in discrete places and not spread all over Seattle. Single family neighborhoods are part of the fabric of Seattle and need to be preserved, rather than turning every 'neighborhood' into condo-ville.

» **Thank you for your comment. The comment is noted.**

The council is out of touch with the people who live in the city.

» **Thank you for your comment. The comment is noted.**

In our neighborhood there are already insufficient parking places for the people that live in the existing homes. Adding multiple new residents will make it impossible for existing residents to park anywhere near their home. It's not

possible to mandate that people living in new ADUs not own cars so the policy proposed will create a lot of tension between new residents and old residents. In addition, it's already hard to drive on some streets when cars are parked wall to wall; the streets are so narrow one has to back up to the last intersection if someone comes in your direction. That's not particularly safe or pleasant. There is public transportation though not super close. How do we convince the new tenants that they are the ones who must use it?

» **Thank you for your comment. The comment is noted.**

Anonymous 118

I strongly urge there to be NO requiring parking for ADUs -- requiring parking means we're privileging space for cars over housing for people. Fewer people are choosing to have cars in the city (including our family!) and giving so much free space to cars means that we're building less housing, having fewer sidewalks and bike lanes, and encouraging the use of fossil fuels that are devastating the climate. It's time to start thinking about how we move people, not cars. Please remove all off-street parking requirements!

» **Thank you for your comment. The comment is noted.**

It would be fantastic if the city could incentivize affordable rentals by eliminating development charges when owners commit to holding them as rentals affordable to people making under 60% AMI for 15 years.

» **Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.**

I believe that the minimum lot size for DADUs and ADUs should be decreased to 2500 square feet. Other land use requirements will constrain lot coverage and ensure enough open space. There are more sub-divided lots in the city and every lot should have the opportunity to add an DADU or ADU!

I also think the city should incentivize green building standards like passivhaus and "living buildings" by eliminating development charges on any units built to those standards.

» **Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code. Please also see Chapter 2, Alternatives, for a discussion of the Preferred Alternative, which would allow additional height for DADUs that incorporate green building standards.**

Anonymous 119

I support no parking requirements

» **Thank you for your comment. The comment is noted.**

I support alternative 3, triplex buildings are a great way to add density to single family zones

» **Thank you for your comment. The comment is noted.**

Many single family zones are in areas of the city with access to better schools, parks, and other amenities. Providing more rental units will open these areas to people of more diverse socioeconomic backgrounds

» **Thank you for your comment. The comment is noted.**

Anonymous 120

As the report shows, parking impact will be very minimal.

» **Thank you for your comment. The comment is noted.**

I believe increasing housing options will be a benefit to both owners and tenants.

» **Thank you for your comment. The comment is noted.**

I support the loosening of regulations on building DADUs/ADUs. I think the population will benefit and impact will be mostly positive.

» **Thank you for your comment. The comment is noted.**

I think the impact in this regard will not be a detriment to SF zones.

» **Thank you for your comment. The comment is noted.**

Objections to this are overblown. There already exists a wide variety of styles and sizes of housing in SF zones. Adding DADU/ADUs would not impact this.

» **Thank you for your comment. The comment is noted.**

The number of additional units we're talking about is pretty small in the grand scheme of utilities at a city level.

» **Thank you for your comment. The comment is noted.**

Anonymous 121

I am in favor of the most flexible possible option. We need fewer barriers and more ADUs.

» **Thank you for your comment. The comment is noted.**

Anonymous 122

With 77 people moving to the city each day, many of them are also bringing cars. We currently live in a rental where finding a parking spot 3 blocks away is a miracle... and we don't even live in a dense part of Seattle like Capitol Hill, Ballard, etc. We support commuting initiatives also, but people still have their

cars and spaces are being removed, car lanes are being removed, and it just adds to the congestion.

» **Thank you for your comment. The comment is noted.**

I strongly prefer option 2. As a Seattle resident, married, in my mid-30s it's nearly impossible to afford a home with an modest salary. We've tried to purchase a home and had 7 offers not be up to snuff. Allowing home owners to add ADU's would help us find more affordable living options to rent.

» **Thank you for your comment. The comment is noted.**

Anonymous 123

its a very small start.

» **Thank you for your comment. The comment is noted.**

good start

» **Thank you for your comment. The comment is noted.**

Need to get rid of rpz's.

» **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Removal of Residential Parking Zones (RPZs) is not considered as part of the proposed Land Use Code changes and is outside the scope of the EIS.**

Anonymous 124

Solid work that you should be proud of. It's a shame that we, as a city in crisis, have been forced to waste this time and effort on unnecessary analysis by those who feel that their desire to freeze a neighborhood in nostalgia is more important than other people having affordable housing options.

» **Thank you for your comment. The comment is noted.**

I support any alternative that better enables rapid development of ADU/ DADUs across the city. Elimination of antiquated/misguided restrictions like minimum parking requirements, height restrictions, minimum lot size, and owner occupancy should be prioritized to increase the range of potential sites for development. We're in the middle of a housing crisis, we should act like it. Of the current proposals, Alternative 2 achieves this best.

» **Thank you for your comment. The comment is noted.**

Anyone concerned about the aesthetic impact of small backyard cottages should instead be worried about the aesthetics of the immediate indignity of a society that forces people into homelessness and the long-term disaster of rising sea-levels eventually reclaiming the land.

» **Thank you for your comment. The comment is noted.**

While we're talking land use, look into scaling back the primacy of single-family zoning that limits housing options, inhibits transit deployment, and reinforces class/race inequities.

» **Thank you for your comment. The comment is noted.**

Housing people is more important than the free or discounted storage of private vehicles on public lands.

» **Thank you for your comment. The comment is noted.**

Anonymous 125

I support Alternative 2 as the most viable option for the new regulations. This allows homeowners to feel that they can undertake an ADU/DADU project without difficult new hurdles to surmount (thus potentially REDUCING the addition of these types of units). This will also allow renters to find more options for housing in neighborhoods that are quieter and offer suitable homes for a variety of lifestyle/family makeups.

» **Thank you for your comment. The comment is noted.**

I support Alternative 2 as the most viable option for the new regulations. Alternative 1 (no change) does not solve our housing and best use of land in any real and immediate way. And Alternative 3, while removing some barriers, creates new ones that would discourage homeowners from pursuing the development of ADU/DADUs. Alternative 2 creates opportunity for homeowners and future renters of these units to fill in housing gaps on underutilized SFR land. Density needs to increase, and not just in the higher density MFR zones. Large areas occupied by SF zoning can only be sustainable in a growing city if the uses on those properties are densified.

» **Thank you for your comment. The comment is noted.**

I support Alternative 2 as the most viable option for the new regulations, as it provides a reasonable threshold for homeowners and greatest immediate options for renters.

» **Thank you for your comment. The comment is noted.**

Typo on page 4-28: First full paragraph, first sentence should read 2018-2027.

» **Thank you for notifying us of this error. It is corrected in this Final EIS.**

Anonymous 126

agree with proposal to allow ADU's to use on street parking - eliminating requirement for off street parking. Off street requirement was too burdensome and would limit the amount of ADU's

» **Thank you for your comment. The comment is noted.**

Would love to move this through quickly - option #2 seems best

» **Thank you for your comment. The comment is noted.**

Agree with changes outlined in Alternative #2 - please move forward with these changes

» **Thank you for your comment. The comment is noted.**

I am not concerned about the current outlined # of increase impacting

» **Thank you for your comment. The comment is noted.**

I have no concerns regarding aesthetics with outlined proposal

» **Thank you for your comment. The comment is noted.**

Prefer ADU/DADU density to large apartment buildings. The apartment buildings are having a bigger impact of fabric of neighborhood, especially the Roosevelt, Eastlake corridor

» **Thank you for your comment. The comment is noted.**

Prefer option of ADU/DADU to generate more affordable housing than giant apartment buildings appearing in my neighborhood.

» **Thank you for your comment. The comment is noted.**

Anonymous 127

Alternative 1 concerns me - I think tearing down existing homes and building huge mansions on the lots does more to ruin the character of the neighborhood than increased density.

» **Thank you for your comment. The comment is noted.**

I do not care about parking. People should be nudged to use public transportation anyway - this includes current homeowners.

» **Thank you for your comment. The comment is noted.**

I support Alternative 2, or anything that would increase density. I do not care about off-street parking requirements

» **Thank you for your comment. The comment is noted.**

Anonymous 128

Neighborhoods without parking are lousy to live in for everyone over the age of 25. While a car-free city is a worthy goal, I can count on one hand the number of adults I know who don't own cars. Most of my coworkers, friends, and family want to own a car, and they want to park it at home. And your EIS is dead wrong, there will be a huge impact, and in most city neighborhoods, if you do this, there will be no parking.

» **Please see the frequent comment response concerning impacts to parking.**

Allowing DADUs that are of the same scale or larger than the existing houses changes the entire feel of a neighborhood. Rarely do the DADUs match the style of the neighborhood; they often are hulking, modern boxes, maximizing the volume of space on the smallest footprint. And this is not how Seattle's single-family neighborhoods were built. Because the DADUs are intermittent, chaotic, and variable in design, it creates a feeling of a packed shantytown.

Further, the loosening of rules will decimate what remains of our tree canopy. Seattle will be hotter, drier, dirtier, and uglier, simply because big trees are an integral part of our city's identity, and packing density only allows little trees. Big trees will get felled to allow construction, or they will go in a year or two when their branches, needles and root swells are incompatible with packed-in housing.

» **Please see the frequent comment response concerning impacts on tree canopy.**

Don't add any more density to Seattle's single family neighborhoods. The people living there want to live in a single-family neighborhood, which is why they bought their house in the first place. And it's their neighborhood--they live there, so they should get to decide how it grows, if at all.

» **Thank you for your comment. The comment is noted.**

Most residential Seattleites resist neighborhood character change, push back against upzoning, and flat-out hate HALA because they don't want our city government to do things like this. And, this is a sneaky way to get around traditional density increases.

» **Thank you for your comment. The comment is noted.**

Single-family residents are being pushed and crushed on all sides. They want to live in real neighborhoods, not packed-in and crushed in vertically and horizontally.

This proposed change is a zoning workaround, to try and undermine the will of the silent majority of people in Seattle, who don't want density or upzoning --or, underhanded urban planner tricks--worked upon their neighborhoods. Concentrate density downtown, so people who want urban culture can enjoy urban culture. Allow people who want quiet, family-friendly, green neighborhoods, and have paid for many years to have them, to keep their neighborhood the way they are.

Remember, the neighborhood is theirs--not yours. "Urban planners" don't have to live with the effects of the changes they are making, and those of us on the ground--we do.

» **Thank you for your comment. The comment is noted.**

Removing the residency requirement will make these house simply rental fodder for REITs and big investors. These investors pepper Seattle with offers all the time. Single family residences are the underlying foundation for America's middle class, and the reduction in home ownership that comes from changes like this is a huge transfer of wealth from everyday citizens to the rich. Additionally, neighborhoods without resident owners are very different than those with a preponderance of renters. They are less attractive to long-term, family, and stable residents, are louder, and have more petty crime. And most people I know that want to live in Seattle's single-family neighborhoods don't want to live in a neighborhood that is mostly renters.

We lived in Fremont before it went to L2. It was fun, safe, clean, with good neighbors that we knew. Our kids could walk around the yard safely. But we couldn't raise a family there after it changed, and had to move. Where? to another single family neighborhood, of course. One with less property crime, nighttime gunshots, drunk people vomiting in our bushes, garbage on the streets, people alternately speeding and gridlocked--and one where the police actually show up when you call. The difference? Our new neighborhood had fewer people, and they were many more owners than renters.

» **Thank you for your comment. The comment is noted.**

There is no future scenario where utility costs are eased for Seattle residents, and I don't see this being any help.

» **Thank you for your comment. The comment is noted.**

Anonymous 129

I am greatly concerned about the proposal to eliminate the requirement that the owner of the property (or a family member) be a resident of the property on which the ADU is proposed to be built. Elimination of the owner-resident requirement will result in speculators and real estate investment funds buying properties with the sole purpose of maximizing their investment. This will further fan the flame of rising home prices, particularly, I think, in Seattle's more affordable neighborhoods. Since the stated intent of this proposed measure is to increase affordability in the City, opening the door to non-resident investors would be a grave mistake.

By all means make it easier and more affordable for homeowners to build well designed backyard cottages, with or without parking. But don't turn Seattle's neighborhoods into a battleground between Seattle families and real estate investment trusts. We all know who will come out the loser in that fight.

- » **Please refer to Section 4.1, Housing and Socioeconomics.**

Anonymous 130

You should not require additional parking. Additional parking spaces raise the cost and encourage driving. Removal of off street parking should be rewarded.

- » **Thank you for your comment. The comment is noted.**

Upzone everything.

- » **Thank you for your comment. The comment is noted.**

Composting toilet systems should be allowed for reduction of water use.

- » **The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of ADUs. Changes to the plumbing code are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.**

Anonymous 131

Finally a step toward letting homeowners find a ways to pay increased property taxes

- » **Thank you for your comment. The comment is noted.**

Anonymous 132

I am not a supporter of more density, I would support the no action alternative

- » **Thank you for your comment. The comment is noted.**

I am opposed to changes in the current codes the would allow more housing on residential property.

- » **Thank you for your comment. The comment is noted.**

Anonymous 133

Seattle has to allow more housing. Alternative 2 does this best.

- » **Thank you for your comment. The comment is noted.**

Alternative 2 is the best.

- » **Thank you for your comment. The comment is noted.**

Anonymous 134

Make it easier to build them, the city really needs extra units

- » **Thank you for your comment. The comment is noted.**

Cities are pretty because of density and shops and people, not because of trees-
-but still, we have plenty of space for trees

- » **Thank you for your comment. The comment is noted.**

Anonymous 135

I'm 100% in favor of increasing the variety and # of housing types available in Seattle. Every neighborhood needs more places to live, fewer free places to park and more transit. Anything the city can do to allow homeowners and developers to increase the # of places to live is good. NIMBY fears are BS, please ignore them.

- » **Thank you for your comment. The comment is noted.**

Anonymous 136

I think these units are an attractive and unique design and contribute variety and aesthetically pleasing variation to the urban landscape. These units create a more human scaled landscape and create facades that are sized for the human form.

- » **Thank you for your comment. The comment is noted.**

I support Alternative 2 and the overall construction of ADUs and DADUs. I do not believe there should be off-street parking requirements for those living in the units.

- » **Thank you for your comment. The comment is noted.**

I believe that ADU and DADUs are an excellent response to the demand of our growing city and provide equitable housing options to people who otherwise would not be able to live in the city where they work. Not providing a variety of options for citizens will increase vehicle miles traveled which also increases pollution, decreases road safety, and decreases quality of life.

- » **Thank you for your comment. The comment is noted.**

Yay ADUs!!!!!!!

- » **Thank you for your comment. The comment is noted.**

I believe that there should not be any parking requirements for housing, especially related to these units. Transit should be prioritized throughout the city

which includes the neighborhoods where these units would be located. The point of increasing housing is to make the city more accessible and available to a wider group of people, so transit should be provided to improve access to their jobs to simulate the economy. The parking analysis showed no serious impacts due to any of the alternatives proposed, so adding parking requirements is going to induce demand and negatively impact congestion, the environment, and quality of life.

» **Thank you for your comment. The comment is noted.**

Public services and utilities are exactly what the name implies. They are services to the public and those who pay taxes to the city that they live in with the expectation that they are receiving basic services. These units are housing citizens of Seattle and are deserving of the same benefits and levels of service as homeowners.

» **Thank you for your comment. The comment is noted.**

Anonymous 137

I believe that this will effect small lots adding sometime massive, bulky homes while distracting from the character of our established neighborhood and your fellow neighbors

» **Thank you for your comment. The comment is noted.**

Agree with City makes no changes Alternative 1

» **Thank you for your comment. The comment is noted.**

Do not agree

» **Thank you for your comment. The comment is noted.**

Permitting in my experience is always understaffed and has a difficult time keeping up with growth and onsite inspections as it is. The current zoning regulations and rules need to be changed and updated to avoid over development not just for ADU

» **Thank you for your comment. The comment is noted.**

I am opposed to this whole concept it is not for us as home owners to be the ones to solve the growth and development of the City in the end this would add monthly financial gain to the homeowner however, more financial benefit for the City in the end

» **Thank you for your comment. The comment is noted.**

This would only add excessive traffic within the residential core while not making a compatible neighborhood and being able to actually park in your neighborhood and at the same time the City has not been able to maintain proper transportation to vital communities already. I strongly believe this will cause our neighborhoods to become over developed, excessive traffic within the residential core and unable to maintain residential character and making not making a compatible neighborhood.

» **Thank you for your comment. The comment is noted.**

This will cause other issues needed by the city such as sidewalks, crosswalks, stop signs etc.

» **Thank you for your comment. The comment is noted.**

5.5 Responses to Form Letters and Petitions

A number of commenters submitted the same form letter or signed onto a petition. We identify the names of people who submitted each form letter or signed a petition and then provide a single response to each.

FORM LETTER SUBMITTED BY EMAIL

Exhibit 5-4 Commenters Who Submitted a Form Letter

Commenter
Adams, Marsha
Altamirano, Yolanda
Anderson, Anthony
Antman, Iris
Armstrong, Rep. Seth
Arvidson, Heather
ashton, lynne
Baker, PhD, Norman
Berg, Ericka
Berkelhammer, Jessi
Berlin, Sue
Besmer, Kelly
Betz-Zall, Rosy
Bhikkhu, Nuntiyo
Bishop, Tarun
Bowers, Joan
Bradford, Nicole
Brendler, Stefanie
Briggs, Geoff
Brotherton, Carolyn
Buckley, Christopher
Bush, Veronica

Commenter
Buttry, Corey
Campbell, Liz
Card, Jesse
Cawley, Curtis
Chapman, Ben
Chase, Jayne
Chippendale, Art
Christensen, David
cochran, deirdre
cohen, judith
corr, nancy
Costamagna, Marilyn
Crimmins, Nancy
Danford Hirsch, Barbara
Darsie, Jean
Denning, Asphodel
Dowson, Eleanor
Ehrlich, Isaac
Eiger, Cheryl
Elder, Heather
Ellis, Jan
Feldman, Sheryl
Fenstemake, Lois
ferrara, kathleen
Fine, Kelly
Fosburgh, Eric
Gallagher, Kevin
Gannon, Vicky
Gillis, Marian
Gish, Edith
Godfrey, Jennifer

Commenter
Goldwarg, Jordan
Gonzales, Mikhaila
Grantier, Clara
Haase, Debra
Harlan, Rick
Harmell, Jack
Herbig, Eric
Hildebrand, Nate
Hoff, Michelle
Howe, Jared
Hughes, Kevin
Humphreys, Anna
Jacobson, Bonnie
Johnson, Alyssa
Johnson, Emma
Johnston, Lloyd
Jones, Clayton
Kauffman, Katherine
Kavage, Sarah
Klein, Leah
Knapp, Dee
Knudsen, Constance
Kretchmer, Andrea
Lafferty, carrie
Lamb, Barbara
Lang, Tom
LaRue, Erik
Liberge, Marcel
Liebermann, Jerry
Lindeke, Lianne
Locascio, Gillian

Commenter
Loe Bernstein, Laura
Loewenstein, Jenny
Louchard, Ed
Low, Sammy
Manderville, Bartholda
Mar, Nora
Markley, Shannon
Martinson, Julianne
Mascall, Nel
Mathews, Holger
Mcgavin, Alora
McLaughlin, Emily
Mermelstein, Jon
Michaels, Melissa
Michel, Morgan
Miknaitis, Gajus
milller, bruce
Miller, Travis
montacute, merv
Montacute, Susan
Moore, Janet
Morgan, Anne
Morrison, Debra
Mouton, Alexander
Murphy, Kyle
Murti, Deven
Nachman, Roger
Neuwald Falcon, Ruth
Newman-Henson, Bridgid Persephone
Nuess, Tegra
Oaks, Stacy

Commenter
Olsheskie-Gray, Andrea
Olson, Chris
Pan, Michael
Pantastico, Hoa
Parker, Deborah
Parsley, Adina
Pavcovich, Michelle
Perfrement, Eileen
Perkins, Sherry L
Peterson, Katrina
Pezely, Rob
Phillips, Ruby
Phinney, Barbara
Ploger, James
Pollock, Thomas
Portney, Miriam
Post, Heather
Powell, Emily
Prentice, Selden
Ramos, Miguel
Rasmussen, Erin
Reep, Irene
reuter, lacey
Robison, David
Ruffin, Sandy
Scheer, David
Scheer, David
Scott-Thoennes, Eliana
Seguel, Leopoldo
Shelton, Anita
Shimeall, Nancy

Commenter
Shisk, Diane
slocum, jean
Smith, Clayton
Smith, Daniel
Smith, Sandra
Southwell, Nicole
Stack, Megan
STIFFLER, TONYA L
Stinson, Greg
Stoller, Elliot
Stroud, Lucinda
Syracopoulos, Thalia
Tam-Claiborne, Daniel
Tarbutton, Don
Thomas, Elissa
Thompesen, Linda S
Thomsen, Don
Tkachuck, Candace
Tollefson, Todd
Tozzi, Lauren
Tracy, Jake
Traff, susan
trospen, michelle
Tucker, Roger
Van Voast, Jordan
Vergara, Laura
Voli, Carlo
Wallach, Jessica
Weaver, Stefanie
West, Rusty & Candice
Wheeler, Gilda

Commenter
Wilson-Briggs, Rosie
Winters, Briar
Winters, Johnna
Wirth, Mark
Yang, Fanny
Yang, Huiling
Yogev, Yonit
Young, KC
Zygas, Kovas

Exhibit 5-5 Form Letter Submitted by Email

Dear Ms. Pennucci and the Seattle City Council,
With the affordable housing shortage Seattle is facing, I think that encouraging people to create more accessory dwelling units would go far to alleviate the issue.

ADU's are a solution that everyone can love. By increasing housing stock, they help keep rental prices down—and they provide flexibility for homeowners, who can leverage their positions to help defray their cost of living, while also providing housing for others. I strongly support additional housing, because want Seattle to be affordable, and households living in dense, transit-rich cities typically generate ¼ to ½ the climate-destroying CO₂ of those displaced to the suburbs. Neither of the existing “alternatives” maximizes the benefits and flexibility, though Alternative 2 is a good start. I strongly urge the following changes, but **only if they wouldn't trigger another round of EIS** (we can't afford the delay):

- **NO PARKING REQUIREMENT** because requiring parking for ADUs that means we're privileging space for cars over housing for people. 1
- **Lots should be allowed 2 ADU's and a DADU;** we want to encourage the subdivision of existing large houses, especially for empty-nesters. If someone has divorced or their kids have left home and they have space for a DADU and also a 2500 square foot house, it's good for everyone if they can do 2 ADU's as well as the DADU: it creates more affordable units, and allows people to stay in their own homes when circumstances change. See [this Portland study](#) about “internal conversions”. 2
- **Remove the owner-occupancy requirement;** it discriminates against renters and greatly disincentivizes building ADUs. Would you build and rent out a backyard cottage if you knew that its existence would block you from later moving out and renting your main house? Additionally, why shouldn't existing rental houses also be able to add ADUs? 3
- **Incentivize affordable rentals** by *eliminating* development charges for units when owners commit to holding them as rentals affordable to people making under 60% AMI for 15 years. 4
- **Incentivize green building standards** like passivhaus and “living buildings”, by eliminating development charges on any units built to those standards. 5
- **Incentivize rentals of more than one month** by lowering development charges for homeowners who commit to month-plus-long rentals for at least 10 years (to encourage rentals for residents, and not AirBNB units). 6
- **Streamline permitting by dedicating specialized reviewers to ADU/ DADU projects.** With just three dedicated staff positions, DCI could reduce the turnaround on permit reviews to a matter of weeks rather than months. If the city pre-approved stock plans with a list of available zoning departures, such as 2 extra feet of allowable height for sloping lots or green roofs, residents who want to build an ADU have a clear and predictable pathway through permitting. 7
- **No MHA Fees.** MHA fees can add 15K+ to the cost of an ADU, thus making it less likely people will build them. Much better to *lower* costs on ADU's held affordable, as mentioned above. 8
- **Lower the minimum square footage for lots that can support DADU's and ADU's** to 2500. A 2500 sq. ft. lot can easily support a 2-story house with a footprint of 800 sq. ft. and an ADU inside, and also a DADU with a 400 sq. foot footprint. 9

We need to enable ADU's, not just allow them. These changes could make a big difference to how much affordable new housing gets built. 10

RESPONSES TO FORM LETTER COMMENTS

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Chapter 2, Alternatives. The Preferred Alternative would remove the off-street parking requirement for ADUs.
- 3 Please also see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.
- 4 Please see Chapter 2, Alternatives. The Preferred Alternative would remove the owner occupancy requirement for ADUs.
- 5 Please see the Chapter 2, Alternatives, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 6 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative that includes allowing additional height for DADUs that incorporate green building features. Please also see the frequent comment responses regarding King County capacity charges and permit fees.
- 7 Please see the frequent comment responses regarding King County capacity charges and permit fees.
- 8 Please see the Chapter 2, Alternatives, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 9 Please see Chapter 2, Alternatives. The Preferred Alternative does not include an affordability requirement.
- 10 Please also see the frequent comment response concerning requests for greater flexibility than contemplated in Alternative 2 or 3.

PETITION FROM THE MAGNOLIA COMMUNITY COUNCIL

Exhibit 5-6 Commenters Who Signed the Magnolia
Community Council Petition

Commenter
Allison, Craig
Alt, Deborah
Birk, Edyth
Bjorkland, Lori
Blums, Angela
Blums, Martin
Boswell, Natasha
Bothell, Linda
Broche, Golen
Brodie, John
Brooks, Christina
Brooks, Kevin
Bucher, James
Buildeschmitter, Sean
Butler, David
Carter, Bruce
Cook, Brian
Cooper, Laura
Cooper, Mark
Crippen, Pat
Dahlman, Carl
DeGrande, JoAnn
Derr, Denise
Diamasis, George
Eckels, Alison
Ellison, Richard
Field, Julia

Commenter
Fine, Phoebe
Fitzgibbons, Dawn
Fitzgibbons, Kerry
Fliegel, Joshua
Frankenburg, Carrie
Galpering, Luis
Gibbs, Judith
Green, Barbara Jo
Haledyne, Helen
Johnson, Gretchen
Kaserzik, David
Katzenberger, Jan
Kirk, Christopher
Kirsh, Andrew
LeVine, Sharon
Ley, Robin
Lipo, Patrick
Loesche, Patricia
Martin, Mellissa
Martinez, Anna
Martinez, Joel
McDuffie, Helen
McHugh, Michael
Moehring, David
Mount, Chris
Moylen, Patrick
Mullen, James
Munroe, John
Opeila, Tim
Parks, Valeria
Pelter, Tracy

Commenter
Poggi, Alice
Porter, Barry
Porter, Frederick
Porter, Heidi
Porter, Margaret
Price, Janice
Risser, David
Risser, Rebecca
Ross, Betsy
Ross, Charles
Ross, Julie
Rulifson, Brian
Sanders, Beth
Shearer, Wendy
Smith, Michael
Soukup, Jake
Stanishaw, Kristin
Studivant, Margaret
Suh, Katie
Sullivan, Joann
Swanberg, Irene
Thompson, Chase
Tollerson, Martin
Torrigo, Albert
Vo, Tri
Watlers, Susan
Williamson, Bill
Wing, Lauren

Exhibit 5-7 Magnolia Community Council Petition

David Moehring, AIA
Magnolia Community
Council Board Member
3444-B 23rd Ave W
Seattle, WA 98199



Land Use Committee

of the Magnolia Community Council

Magnolia Community Council
P.O. Box 99564
Seattle, WA 98139-0564

May 31, 2018

**RE: THREE DWELLINGS ON SINGLE FAMILY LOTS
Resulting in Local Climate Change Impacts proposed with City of
Seattle's Accessory Dwelling Units Draft Environmental Impact Study**

Dear City of Seattle,

Seattle residents look to the City Council to assure growth with a blend of residential density AND urban forests. Seattle's focus is to avoid climate change, Mayor Burgess issued an Executive Order to strengthen tree protections; and Mayor Durkan publicly stated that one (density) size does not fit all communities. To the contrary, the proposed Accessory Dwelling Units Draft Environmental Impact Study (ADU DEIS) opposes these directions by:

- Eliminating housing diversity that exists with SF zones;
- Eliminating sufficient open space on private property for trees;
- Expanding Seattle's Climate-Changing Heat Islands citywide;
- Eliminating environments that support Seattle's Natural Habitats.



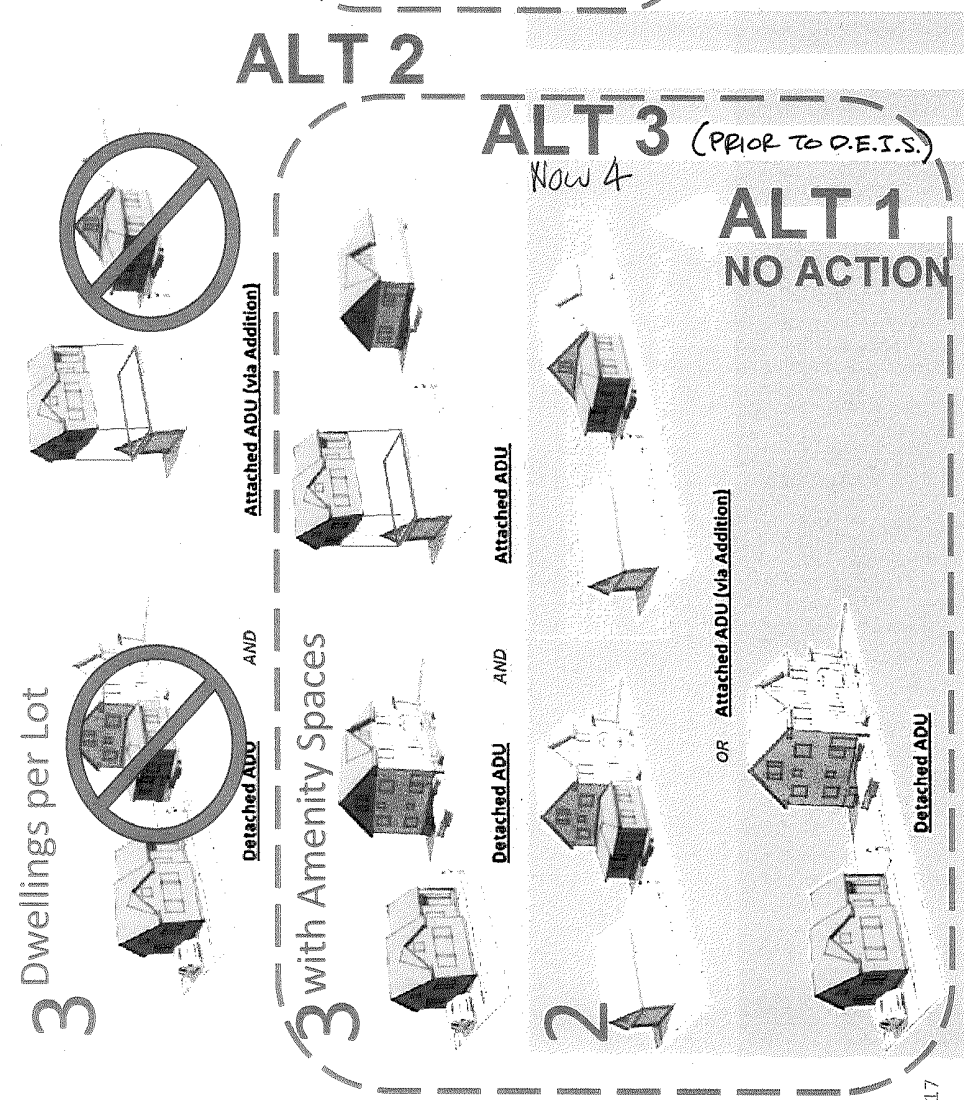
FIGURE 1- SEATTLE'S SINGLE-FAMILY ZONES AS RENDERED WITHIN THE DEIS FOR ADU

Please include these local climate change and natural habitat concerns any proposed changes to Seattle Accessory Dwelling Unit (ADU) legislation. Include in the ADU Study the alternative approach endorsed by 87 Seattle residents.

Sincerely,

David Moehring AIA NCARB, Architect
Board Member, Magnolia Community Council and TreePAC

- ALT 2 includes both AADU and DADU in backyard
 - Reduced green space and trees.
 - No parking required
 - Reduced privacy
- Community Proposed*
 ALT 3 allows only 1 ADU in backyard, where AADU must be mostly within primary dwelling footprint if DADU is also provided.
- Parking required.
 - Min. required outdoor space for each ADU
- No Action (ALT 1) allows only 1 ADU.
 - Parking Required.



Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017
Petition to Seattle EIS Scoping for Accessory Dwelling Units (ADU and DADU) within Single-Family Residential Zones

The undersigned Seattle residents *do not support* proposed Alternative #2 proposed for Accessory Dwelling Units (ADU) as we find the alternative’s parameters are contrary to the goal of “livable communities”, diverse affordable housing options, and consequential reduction of Seattle’s heritage and exceptional trees and ‘green canopy’.

Therefore, this petition calls to broaden the scope of the Environmental Impact Study (EIS) regarding the City’s proposed incentives for Accessory Dwelling Units (ADU). The EIS shall include the additional environmental impact parameters for all Alternatives being considered:

- A mandatory evaluation period 2 and 4 years after implementation to ensure any Attached and Detached ADU legislation is achieving the intended goals.
- Incremental impacts to Seattle’s designated Tree Canopy and goals for 30% coverage by 2037.
- Given increased density proposed by the City with Alternate #2, the EIS shall require enforcing tree protection rules for proposed ADU developments in accordance with similar provisions for *Lowrise Zones* including Streamlined Design review (including SMC 23.41.018, 23.09.320, 23.44.008, 23.45.015 and 25.11.060 to 070).
- Analyze the demand for additional public park space in residential areas where open space is replaced by ADU on single-family lots.
- Impact with or without ADU financing options incentives for existing homeowners (verses only speculative ADU development.)
- Impacts of short plat subdivisions of lots over 6,000 square feet by those owners and developers looking to further increase the potential number of dwellings within single-family residential zones.

In addition to the expanded scope of the EIS for all alternatives as outlined, this petition calls for additional **Alternative Number 3** (hereafter ‘ALT 3’) to be studied within the Study:

Criteria	ALT 1 (No Change)	ALT 3
Number of ADU Allowed on a single-family lot	One Attached ADU or one Detached ADU, but not both.	Same as ALT 1. If at least 80% of the Attached ADU gross floor area is below the primary dwelling, then both a detached ADU and attached ADU is allowed.
Parking	One off-street parking space is required for the ADU unless within Urban Village.	Same as ALT 1. Exception to ADU parking only allowed if frequent transit options are demonstrated for the property.
Owner Occupancy	Owner must occupy the primary residence or ADU at least 6 months in a year.	Same as ALT 1. Owner must occupy the primary residence or one ADU at least 6 months in a year.
Minimum lot size for a DADU	4,000 square feet	Same as ALT 1: 4,000 square feet
Maximum square footage of ADU	Attached ADU: 1000 square feet <i>including</i> garage and storage areas; Detached ADU: 800 square feet <i>including</i> garage and storage areas.	Similar to ALT 1: Attached ADU: 1000 square feet <i>including</i> garage and storage areas; Detached ADU: 1000 square feet <i>including</i> garage and storage areas.
Maximum Height of ADU	No change from existing height limits, which vary by lot width and range from 15-23 feet.	Same as ALT 1.
Lot Coverage Limit (of Primary Residence)	35% of lot area for lots 5,000 square feet and larger; and 15% of lot area plus 1,000 square feet for lots under 5,000 square feet	35% of parent lot area for lots 5,000 square feet and larger; and 15% of lot area plus 1,000 square feet for parent lots under 5,000 square feet

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

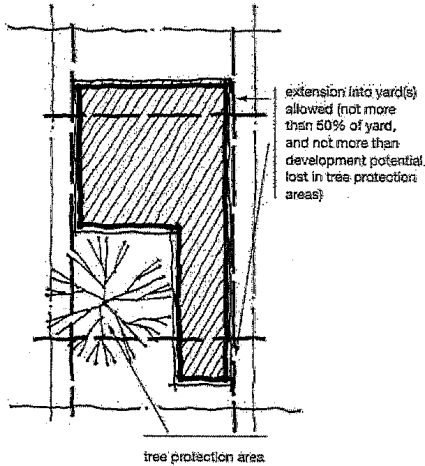
Criteria (continued)	ALT 1 (No Change)	ALT 3
Rear Yard Coverage Limit	40% of a rear yard can be covered by DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage limit.	Provide 150 SF of private amenity area for each ADU plus 150 SF of common amenity area for all ADU. (Similar to SMC 23.45.522 - Amenity area.) This area excludes required side and rear yard setbacks less than 10 feet in width. Remaining rear yard can be covered by DADU and accessory structures (like a garage).
Location of entries	DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right of way.	Same as ALT 1.
Roof features	No exception to the height limits are allowed for roof features on accessory structures.	Exceptions to the height limit are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.
Household Size	Any number of related people, or up to 8 unrelated people can live on a single family lot, including in an Attached or Detached ADU.	Any number of related people, or up to 8 unrelated people can live on a single family lot, including in an Attached or Detached ADU. If the lot qualifies for Attached and Detached ADU, the limit = 12.
MHA Requirements	Not applicable	Same as ALT 1
Rental Registration and Inspection Ordinance	No change to present requirements.	Same as ALT 1

	Alternative 1 (No Action)	Alternative 2
Number of ADUs allowed on a single-family lot	A single-family lot can have one AADU or one DADU, but not both.	A single-family lot can have an AADU and a DADU.
Parking	One off-street parking space required for an AADU or DADU unless the lot is in an urban village.	No off-street parking required.
Owner occupancy	Owner must occupy either the main house or the AADU/DADU for 180 days per year.	No requirement for an owner to occupy the house AADU or DADU.
Minimum lot size for a DADU	4,000 square feet	3,200 square feet
Maximum square footage	AADU: 1,000 square feet, including garage and storage areas. DADU: 600 square feet, including garage and storage areas.	AADU: 1,000 square feet, excluding garage and storage areas. DADU: 1,000 square feet, excluding garage and storage areas.
Maximum height	No change from existing height limits, which vary by lot width and range from 15-23 feet.	Height limits are 1-3 feet higher than existing limits, depending on lot width.
Lot coverage limit	25 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet.	
Rear yard coverage limit	40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage limit.	60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story and if rear yard coverage from other accessory structures is less than 40 percent.
Location of entries	DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.	DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).
Roof features	No exceptions from the height limit are allowed for roof features on accessory structures.	Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.
Household size	Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.	Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.
MHA requirements	Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.	
Rental Registration & Inspection Ordinance (RRIO)	Property owners, including those in Single Family zones, must register for inspections to ensure housing is safe and meets basic maintenance requirements.	

Figure 1 – (above) for reference, current alternative as published by the City of Seattle

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

Figure 1. Example of tree protection in single family zones



limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018,
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DFD/Publications/CAM/can242.pdf>

Lowrise 1, Lowrise 2 and Lowrise 3 Zones

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

1 Name Pat Carroll Crippen Signature Pat Carroll
Street Address 6811 Phinney Ave^N or email patutiel@comcast.net
Registered Seattle voter? (Circle One) Yes No Date _____

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

2 Name CHRISTOPHER KIRK Signature Chris Kirk
Street Address 1925 35th Ave W or email CHRIS@KIRKELL.COM
Registered Seattle voter? (Circle One) Yes No Date 10/28/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).
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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

3 Name Vibekha Parks Signature Vibekha N. Parks
Street Address 4335 32nd Ave W or email vibekhaparks@me.com
Registered Seattle voter? (Circle One) Yes No Date Resident / Green Card

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).
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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

4 Name Patrick + Nancy Maylan Signature NJ Maylan
Street Address _____ or email nancy.j.wade@yahoo.com
Registered Seattle voter? (Circle One) Yes No Date 10/28/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).
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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

5 Name Sean Buldeschewer Signature S. Buldeschewer
Street Address _____ or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/28/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).
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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

6 Name Michael Smith Signature Michael Smith
Street Address 4321 31st Ave West or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/28/2017

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study - Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

7 Name Brian Cook Signature Brian Cook
Street Address 9334-32ND AVE or email tobecooked@earthlink.net
Registered Seattle voter? (Circle One) Yes No Date 10/27/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

8 Name Judith M. Gibbs Signature Judith M Gibbs
Street Address 4338 32nd Ave West or email jude@writeguru.com
Registered Seattle voter? (Circle One) Yes No Date 10/28/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

9 Name Alice Fogari Signature A Fogari
Street Address 1510 Francis or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/29/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

10 Name JAN KATZENBERGER Signature JAN KATZENBERGER
Street Address 2051 NW 60th ST or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/30/2017

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

11 Name Chase Thompson Signature [Signature]
Street Address 4343 31st Ave W or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/23/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

12 Name John De Grande Signature [Signature]
Street Address 4009 W. Bertina St or email _____
Registered Seattle voter? (Circle One) Yes No Date 10.28.17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

13 Name Michael McHugh Signature [Signature]
Street Address 4009 W Bertina or email _____
Registered Seattle voter? (Circle One) Yes No Date 10.28.17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

14 Name Carrie Husein Signature [Signature]
Street Address 3514 W. BERTINA ST. or email CARRIE@CRABAPPLESANDRICE.COM
Registered Seattle voter? (Circle One) Yes No Date 10/28/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

15 Name Margaret Sturdivant Signature Margaret Sturdivant
Street Address 6412 34th NW or email psturdivant@earthlink.net
Registered Seattle voter? (Circle One) Yes No Date _____

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

16 Name Andrew Kirsh Signature Andrew Kirsh
Street Address 1414 E. Harrison St. or email andrewkirsh@hotmail.com
Registered Seattle voter? (Circle One) Yes No Date 10-30-17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

17 Name David Moehring Signature David Moehring
Street Address 3444 73rd Ave #B or email dmoehring@consultant.com
Registered Seattle voter? (Circle One) Yes No Date 10-30-2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

18 Name Kerry C. Fitzgibbons Signature Kerry C. Fitzgibbons
Street Address 6016 20th AVE NW or email Fitzgibbons.Kerry@gmail.com
Registered Seattle voter? (Circle One) Yes No Date 10/30/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

19 Name Dawn Fitzgibbons Signature Dawn Fitzgibbons
Street Address 6016 20th Ave NW or email dawn.fitzgibbons@gmail.com
Registered Seattle voter? (Circle One) Yes No Date 10/30/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

20 Name Linda Bothell Signature Linda Bothell
Street Address 1728 Magnolia Blvd West or email lindabothell@me.com
Registered Seattle voter? (Circle One) Yes No Date 10/30/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

21 Name Barry Porter Signature [Signature]
Street Address 2802 35th Ave West or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/30/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

22 Name Kristin Stanislaw Signature [Signature]
Street Address 2823 35th Ave West or email Kristin.Stanislaw@gmail.com
Registered Seattle voter? (Circle One) Yes No Date 10/20/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

23 Name Tim Opriela Signature [Signature]
Street Address 2923 35th Ave West or email Kristin.Stanislaw@gmail.com
Registered Seattle voter? (Circle One) Yes No Date 10/30/17

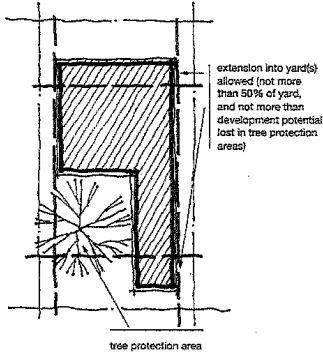
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

24 Name Levi Bjorklund Signature [Signature]
Street Address 2829 35th Ave W or email LEVI.BJORKLUND@GMAIL.COM
Registered Seattle voter? (Circle One) Yes No Date 10-30-17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

Figure 1. Example of tree protection in single family zones



Lowrise 1, Lowrise 2 and Lowrise 3 Zones

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018.
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DD/Publications/CAM/cam22.pdf>

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

25 Name Bruce D. Carter Signature [Signature]
Street Address 3012 W. Eaton, Seattle or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/26/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

26 Name KEITH SANDERS Signature [Signature]
Street Address 3012 West Belmont or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/26/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

27 Name Keon Brooks Signature [Signature]
Street Address 2855 35th Ave W or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/30/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

28 Name Christina Brooks Signature [Signature]
Street Address 2855 35th Ave W or email christinabrooks@gmail.com
Registered Seattle voter? (Circle One) Yes No Date 10/30/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

29 Name Colin Sachs Signature [Signature]
Street Address 2945 35th Ave W or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/30/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

30 Name Carrie Frankenburg Signature [Signature]
Street Address 2906 39th Ave W or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/30/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

31 Name James M. Muller Signature James M. Muller
Street Address 3916 W. Barton or email jim.muller.com@gmail.com
Registered Seattle voter? (Circle One) Yes No Date Oct 28, 2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

32 Name PATRICK LIPO Signature Pat Lipo
Street Address 3712 W. Prospect St or email patlipo@yahoo.com
Registered Seattle voter? (Circle One) Yes No Date 10/28/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

33 Name CARL DAHLMAN Signature Carl Dahlman
Street Address 3214 37th AVE NW or email carldahlman1@comcast.net *
Registered Seattle voter? (Circle One) Yes No Date 10/28/17

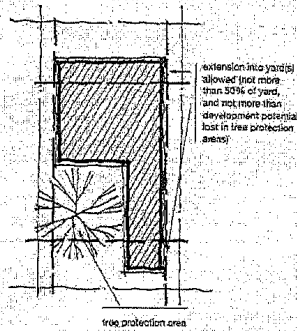
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

34 Name JOHN MUNROE Signature John Munroe
Street Address 6553 25th AVE NW or email john@oceancurrents.biz
Registered Seattle voter? (Circle One) Yes No Date 10-30-17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

Figure 1. Example of tree protection in single family zones



Lowrise 1, Lowrise 2 and Lowrise 3 Zones

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018.
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a principal structure with a minimum slope of 5:12 for a pitched roof with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.
<http://www.seattle.gov/DED/Publications/CAM/2012.pdf>

Figure 2 – Current tree protection measures in lowrise development shall be extended into ADU development parameters.

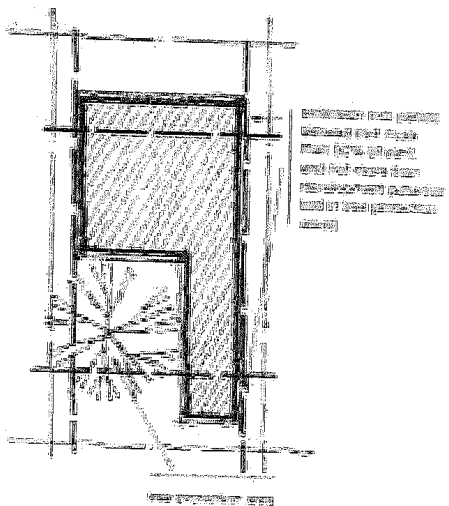
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying visibility of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

795 Name Patricia Loesche Signature Patricia Loesche
Street Address 4317 2nd Ave NW 98107
or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/31/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – May 2017

Figure 1. Example of tree protection in single family zones



Protect tree preservation zones (TPZ) surrounding the tree during construction. The TPZ is defined by the diameter of the tree trunk and the height of the tree. The TPZ is defined by the diameter of the tree trunk and the height of the tree. The TPZ is defined by the diameter of the tree trunk and the height of the tree.

- Minimum tree preservation zone (TPZ) for trees with DBH 4-6 inches
- Minimum tree preservation zone (TPZ) for trees with DBH 7-12 inches
- Minimum tree preservation zone (TPZ) for trees with DBH 13-18 inches
- Minimum tree preservation zone (TPZ) for trees with DBH 19-24 inches
- Minimum tree preservation zone (TPZ) for trees with DBH 25-30 inches
- Minimum tree preservation zone (TPZ) for trees with DBH 31-36 inches
- Minimum tree preservation zone (TPZ) for trees with DBH 37-42 inches
- Minimum tree preservation zone (TPZ) for trees with DBH 43-48 inches
- Minimum tree preservation zone (TPZ) for trees with DBH 49-54 inches
- Minimum tree preservation zone (TPZ) for trees with DBH 55-60 inches

Lowercase 1, Lowercase 2 and Lowercase 3 Zones

These zones are designated for trees with a diameter less than 4 inches. The purpose of these zones is to protect trees with a diameter less than 4 inches. The purpose of these zones is to protect trees with a diameter less than 4 inches.

Additional tree preservation zones are defined in the following table.

See page 150 for more information.

Figure 2. Current tree preservation standards in Seattle's designated single family zones (ADU) and general parameters.

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope, and hereby petition for the City of Seattle to include within the EIS Scope existing current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts on Seattle's designated tree canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plot subdivisions of less than 6,000 square feet in density.

36 Name: Julia Field Signature: [Signature]
 Street Address: 2834 N 44th St or email: juliafield@gmail.com
 Registered Seattle voter? (Circle Yes/No) Yes Date: 10/26/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope, and hereby petition for the City of Seattle to include within the EIS Scope existing current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plot subdivisions of less than 6,000 square feet in density.

37 Name: Julie Galper no back Signature: [Signature]
 Street Address: _____ or email: ju.galper@gmail.com
 Registered Seattle voter? (Circle Yes/No) Yes Date: 10/26/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

38 Name James Bucher Signature [Signature]
Street Address 3451 22nd Ave W. unit B or email James.e.bucher@gmail.com
Registered Seattle voter? (Circle One) Yes No Date Nov 5, 2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

39 Name David Bille Signature [Signature]
Street Address 3465 22nd Ave W or email _____
Registered Seattle voter? (Circle One) Yes No Date 11/5/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

40 Name Deborah Alt Signature [Signature]
Street Address 5024 Puget Blvd SW or email _____
Registered Seattle voter? (Circle One) Yes No Date Nov 5, 2017

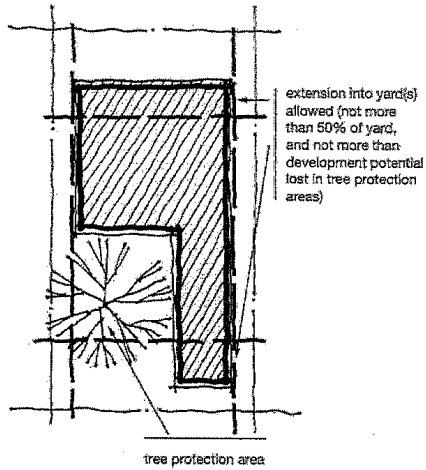
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- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

41 Name Robin Lee Signature [Signature]
Street Address 3011 23rd Ave W or email roblee@jefferson.com
Registered Seattle voter? (Circle One) Yes No Date 11/10/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov.2017

Figure 1. Example of tree protection in single family zones



limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018,
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.614.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DPD/Publications/CAM/cam242.pdf>

Lowrise 1, Lowrise 2 and Lowrise 3 Zones

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

42 Name Brian Rulifson Signature [Signature]
Street Address 4335 2nd AVE NW, 98107 or email brgovmail@rulifson.com
Registered Seattle voter? (Circle One) Yes No Date 31 October 2017

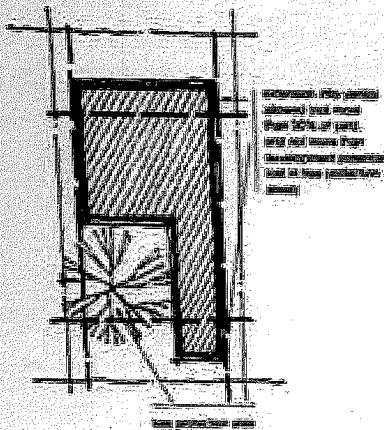
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

43 Name Julie Ross Signature [Signature]
Street Address 3630 244th Ave W or email julieross@yahoo.com
Registered Seattle voter? (Circle One) Yes No Date 11-10-17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study - Nov 2017

Figure 1. Example of tree protection in single family zones



When construction plans are submitted for the tree clearing (removal) shall provide the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio rules. The project developer (applicant) must use one of the more of the following options if it should also preserve nature of the tree:

- Development shall not exceed the maximum allowed floor area ratio pursuant to 23.41.030.
- Development standard departures, including setbacks and required setbacks pursuant to 23.41.017.
- Increase in covered height as permitted in 23.41.030.A.3 of up to 20 feet to the level of finished floor with a maximum slope of 4:12 for a finished structure with a total height area of all feet that is subject to the proposed floor coverage of 23.45.010.C. The additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by existing development within the tree protection zone.
- Reduction in number of required parking spaces as permitted in 23.41.020.A.3.

Applicants may use any of the above departures to meet these rules.

http://www.seattle.gov/development/CADU.html.pdf

Figure 2 - Current tree protection measures in lower development shall be extended into ADU development parameters

As a Seattle resident, I do not support proposed Alternative #3 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope containing current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet to density.

44

Name: Tanice Price Signature: Tanice E. Price
 Street Address: 118 N. 43rd St. or email:
 Registered Seattle voter? (Circle One) Yes No Date: 10/31/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope containing current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

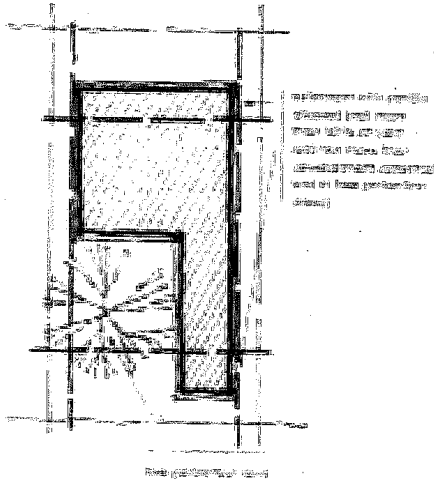
- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet to density.

45

Name: Latasha Signature: Latasha
 Street Address: 2032 23rd Ave or email:
 Registered Seattle voter? (Circle One) Yes No Date: 11-10-17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

Figure 1. Example of tree preservation in single family zones



When a tree is located within the proposed ADU footprint, the tree should be preserved. If the tree is located within the proposed ADU footprint, the tree should be preserved. If the tree is located within the proposed ADU footprint, the tree should be preserved.

- The proposed ADU footprint shall not encroach on the minimum 10-foot buffer zone around the tree trunk or canopy.
- The proposed ADU footprint shall not encroach on the minimum 10-foot buffer zone around the tree trunk or canopy.
- The proposed ADU footprint shall not encroach on the minimum 10-foot buffer zone around the tree trunk or canopy.
- The proposed ADU footprint shall not encroach on the minimum 10-foot buffer zone around the tree trunk or canopy.

Lowrise 1, Lowrise 2 and Lowrise 3 Zones

In zones 1, 2, and 3 of the city, the proposed ADU footprint shall not encroach on the minimum 10-foot buffer zone around the tree trunk or canopy. The proposed ADU footprint shall not encroach on the minimum 10-foot buffer zone around the tree trunk or canopy.

- The proposed ADU footprint shall not encroach on the minimum 10-foot buffer zone around the tree trunk or canopy.
- The proposed ADU footprint shall not encroach on the minimum 10-foot buffer zone around the tree trunk or canopy.

Figure 2 - Current tree preservation measures in residential development shall be extended into ADU development parameters

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope, and hereby petition for the City of Seattle to include within the EIS Scope maintaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy
- Identifying the demand for additional public park space in residential areas
- Identifying viability of existing homeowner ADU financing options incentives
- Measuring impacts of street plat subdivisions of lots over 6,000 square feet in density.

49 Name DAVIDYA KOPCZYK Signature D. Kopyczk
Street Address 1543 NW 62nd St or email kzkbi@icloud.com
Registered Seattle voter? (Circle One) Yes No Date - Oct 27, 2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope, and hereby petition for the City of Seattle to include within the EIS Scope maintaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy
- Identifying the demand for additional public park space in residential areas
- Identifying viability of existing homeowner ADU financing options incentives
- Measuring impacts of street plat subdivisions of lots over 6,000 square feet in density.

50 Name Phoebe Fine Signature Phoebe Fine
Street Address 1543 NW 62nd St or email Phoebe.Fine@u.wa.edu
Registered Seattle voter? (Circle One) Yes No Date 10/27/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study - Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope, and hereby petition for the City of Seattle to include within the EIS Scope containing current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homes for ADU financing options alternatives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet in density.

46 Name: Susan Walters Signature: [Signature]
Street Address: 2016 NW 60th St or email: _____
Registered Seattle voter? (Circle One) Yes No Date: 10/29/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope, and hereby petition for the City of Seattle to include within the EIS Scope containing current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homes for ADU financing options alternatives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet in density.

47 Name: Laura Wix Signature: [Signature]
Street Address: 3652 23rd Ave W or email: laurawix@comcast.net
Registered Seattle voter? (Circle One) Yes No Date: 11/10/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope, and hereby petition for the City of Seattle to include within the EIS Scope containing current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homes for ADU financing options alternatives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet in density.

48 Name: Jake Sankup Signature: [Signature]
Street Address: 3652 23rd Ave W or email: _____
Registered Seattle voter? (Circle One) Yes No Date: 11/10/17

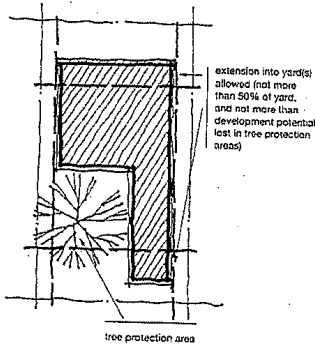
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope, and hereby petition for the City of Seattle to include within the EIS Scope containing current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homes for ADU financing options alternatives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet in density.

Name: _____ Signature: _____
Street Address: _____ or email: _____
Registered Seattle voter? (Circle One) Yes No Date: _____

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

Figure 1. Example of tree protection in single family zones



limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018.
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DFD/Publications/CAM/cam242.pdf>

Lowrise 1, Lowrise 2 and Lowrise 3 Zones

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

51 Name Betsy Ross Signature Betsy Ross
Street Address 2146 40th Ave W or email Betsy.Ross@gmail.com
Registered Seattle voter? (Circle One) Yes No Date 10/20/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

52 Name Charles Ross Signature Charles Ross
Street Address 2146 40th Ave W or email charles.ross@gmail.com
Registered Seattle voter? (Circle One) Yes No Date 10/20/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

53 Name BARBARA JO GREEN Signature Barbara J. Green
Street Address 201 NW 40th St or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/31/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

54 Name Denise Perry Signature Denise Perry
Street Address 2912 4th Ave W or email _____
Registered Seattle voter? (Circle One) Yes No Date 11/6/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

55 Name Sharon Levine Signature Sharon Levine
Street Address 2819 4th Ave W or email sweetumsseattle@yahoo.com
Registered Seattle voter? (Circle One) Yes No Date 11/6/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

Name _____ Signature _____
Street Address _____ or email _____
Registered Seattle voter? (Circle One) Yes No Date _____

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).
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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

56 Name Melissa Martin Signature [Signature]
Street Address 1745 25th Ave NW or email MELISSAMARTIN@GMAIL.COM
Registered Seattle voter? (Circle One) Yes No Date 10-30-2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

57 Name ALBERT TORRICO JR. Signature [Signature]
Street Address 6745 25th Avenue or email TORRICOJR@GMAIL.COM
Registered Seattle voter? (Circle One) Yes No Date 10/30/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).
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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

58 Name Debra Abrahamson Signature [Signature]
Street Address 1533 Eastern Ave N or email SCOTT WA 98103
Registered Seattle voter? (Circle One) Yes No Date 10/31/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).
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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

59 Name David L. Risser Signature DAVID L. RISSER
Street Address 2833 35th Ave W or email _____
Registered Seattle voter? (Circle One) Yes No Date 10-31-17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

60 Name Irene Swanberg Signature Irene Swanberg
Street Address 2613 35th Ave or email iswanlets@comcast.net
Registered Seattle voter? (Circle One) Yes No Date 11/12/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

61 Name TRIVU Signature Triv
Street Address 2638 35th Ave W or email triv0300@yahoo.com
Registered Seattle voter? (Circle One) Yes No Date 11/12/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

62 Name Gratchen Johnson Signature G Johnson
Street Address 2629 35th Ave W or email gratchen-johnson@live.com
Registered Seattle voter? (Circle One) Yes No Date 11/12/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

63 Name JOSE MARTINEZ Signature J Martinez
Street Address 7319 35th Ave W or email martinez.jose@gmail.com
Registered Seattle voter? (Circle One) Yes No Date 11/12/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).
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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

64 Name Bill H. Williamson Signature Bill Williamson
Street Address 2856 36th Ave W or email billwilliamson352@gmail.com
Registered Seattle voter? (Circle One) Yes No Date 11/12/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).
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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

65 Name Jean M. Sullivan Signature Jean M. Sullivan
Street Address 2856 36th Ave W or email jean212@email.com
Registered Seattle voter? (Circle One) Yes No Date 11/12/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).
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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

66 Name Martin Blums Signature M. Blums
Street Address 2812 35th Ave W or email MBLUMS@GMAIL.COM
Registered Seattle voter? (Circle One) Yes No Date 11/12/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).
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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

67 Name Angela Blums Signature Angela Blums
Street Address 2812 35th Ave W or email angela.blums@gmail.com
Registered Seattle voter? (Circle One) Yes No Date 11/12/17

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

Name _____ Signature _____
Street Address _____ or email _____
Registered Seattle voter? (Circle One) Yes No Date _____

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

68 Name John Brodie Signature John Brodie
Street Address 2845 35th Ave W or email JOHN.BRODIECGMAIL.COM
Registered Seattle voter? (Circle One) Yes No Date _____
(I'm Canadian!)

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

69 Name REBECCA BISSER Signature Rebecca Bisser
Street Address 2893 35th Ave W or email broneur@swede.comcast.net
Registered Seattle voter? (Circle One) Yes No Date 10-31-17

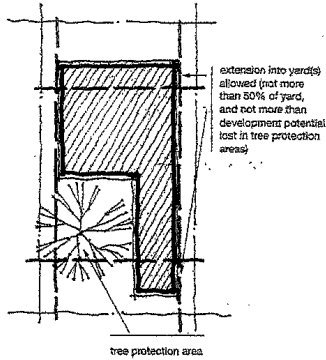
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

70 Name EDYTH BIRK Signature Edyth Birk
Street Address 2602 35th Ave W or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/31/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

Figure 1. Example of tree protection in single family zones



Lowrise 1, Lowrise 2 and Lowrise 3 Zones

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

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- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
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- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DPD/Publications/CAMF-csm212.pdf>

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

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- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

71 Name Heidi Porter Signature Heidi Porter
Street Address 3018 34th Ave W. or email _____
Registered Seattle voter? (Circle One) Yes No Date Nov 4, 2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

72 Name Margaret Porter Signature Margaret Porter
Street Address 3018 34th W. or email _____
Registered Seattle voter? (Circle One) Yes No Date November 4, 2017

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study - Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

73 Name Frederick C. Parks Signature Frederick C. Parks
Street Address 3018 34th W. or email _____
Registered Seattle voter? (Circle One) Yes No Date Nov. 4, 2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

74 Name Natasha Boswell Signature Natasha Boswell
Street Address 2014 West Bayview or email ntshboswill85@gmail.com
Registered Seattle voter? (Circle One) Yes No Date _____

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

75 Name George Dimas Signature George Dimas
Street Address 2637 35th Ave W or email dimas2@comcast.net
Registered Seattle voter? (Circle One) Yes No Date 11/6/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

76 Name Chris Mount Signature Chris Mount
Street Address 2803 35th Ave W or email chridome@gmail.com
Registered Seattle voter? (Circle One) Yes No Date 11/6/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

77 Name TICOM PELTER Signature [Signature]
Street Address 10412 DAVENPORT AVE N or email _____
Registered Seattle voter? (Circle One) Yes No Date 10-2-17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

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- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

78 Name Helen R. Haladyna Signature [Signature]
Street Address _____ or email hthaladyna@gmail.com
Registered Seattle voter? (Circle One) Yes No Date 11-2-17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

79 Name Helen McDuffie Signature [Signature]
Street Address _____ or email helenmcduffie34@gmail.com
Registered Seattle voter? (Circle One) Yes No Date 11-2-17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

80 Name Alicia Eckels Signature [Signature]
Street Address 311 N 7th St #2005 or email _____
Registered Seattle voter? (Circle One) Yes No Date _____

81 ~~Wendy~~ Wendy Thompson Shearer
2107J NW 65th St
Seattle, WA 98117
wendythompsonshearer@gmail.com
(yes)

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study Nov 2017
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet to density.

82 Name MARK COOPER Signature [Signature]
Street Address 2630 NW 82nd ST or email _____
Registered Seattle voter? (Circle One) Yes No Date 11/1/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet to density.

83 Name ANNE HENNINGSEN Signature [Signature]
Street Address 2650 NW 86th ST or email _____
Registered Seattle voter? (Circle One) Yes No Date 11/2/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet to density.

84 Name ALFON TOLLESON Signature [Signature]
Street Address 4112 3rd AVE S or email _____
Registered Seattle voter? (Circle One) Yes No Date 13 Nov 2017

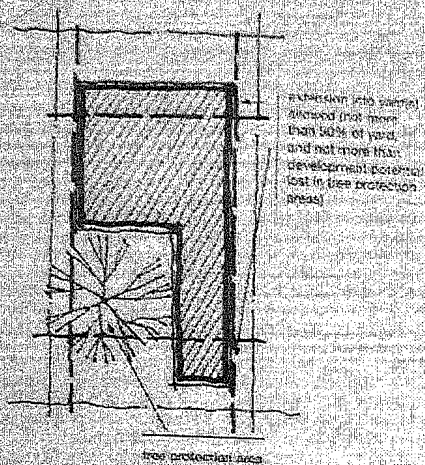
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plot subdivisions of lots over 6,000 square feet to density.

Name _____ Signature _____
Street Address _____ or email _____
Registered Seattle voter? (Circle One) Yes No Date _____

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study Nov 2017

Figure 1. Example of tree protection in single family zones



Lowrise 1, Lowrise 2 and Lowrise 3 Zones

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.016), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

limited circumstances where preserving the tree is not a feasible alternative. The applicant must demonstrate that the tree is exceptional and that its removal is necessary for the project. The applicant must also demonstrate that the tree's removal is necessary for the project and that the tree's removal is necessary for the project.

- Development shall not exceed a height of 20 feet above the finished ground level.
- Development shall not exceed a height of 20 feet above the finished ground level.
- Increase in maximum height shall be limited to 20 feet (70 feet) or 10% to 50 feet to the top of a pitched roof with a maximum slope of 12:12 on a principal structure with a base height limit of 40 feet that is subject to the dual setback provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional area is limited to the amount of lot area lost by avoiding development within the tree protection area.
- Reduction in number of detached parking spaces is permitted in 25.11.030 A.5.c.

Applicants may use any of the above alternatives to retain these trees.

http://www.seattle.gov/DPD/Publications/CADU_eis/2017.pdf

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

Name _____ Signature _____
 Street Address _____ or email _____
 Registered Seattle voter? (Circle One) Yes No Date _____

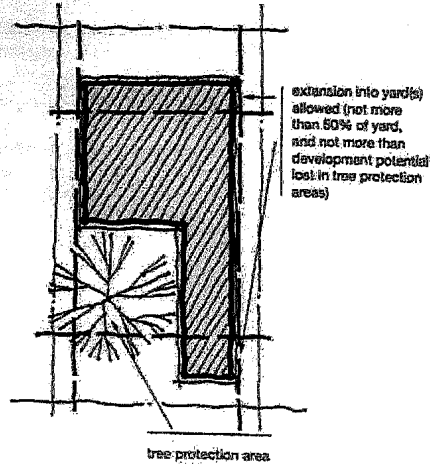
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

85 Name Richard Ellison Signature [Signature]
 Street Address 8003-28th Ave NE or email climbwall@msn.com
 Registered Seattle voter? (Circle One) Yes No Date 0-31-17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

Figure 1. Example of tree protection in single family zones



limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018,
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012,
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DPD/Publications/CAM/cam242.pdf>

Lowrise 1, Lowrise 2 and Lowrise 3 Zones

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in:

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

86 Name Laura Cooper Signature [Signature]
Street Address 7710 31st Ave NW or email _____
Registered Seattle voter? (Circle One) Yes No Date Oct 27, 2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

87 Name Joshua Hiesel Signature [Signature]
Street Address 1409 NE 70th St or email _____
Registered Seattle voter? (Circle One) Yes No Date 10/27/2017

RESPONSES TO MAGNOLIA COMMUNITY COUNCIL PETITION

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.
- 4 Thank you for your comment. The comment is noted.
- 5 Thank you for your comment. The comment is noted.
- 6 The City has previously required ongoing monitoring of ADUs and may include that requirement in the final legislation
- 7 Please see frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use, and exceptions added to the preferred alternative to preserve trees.
- 8 Please see frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use, and exceptions added to the preferred alternative to preserve trees.
- 9 Please see Section 4.2, Land Use, which has been updated in this Final EIS to include a discussion of parks and open space.
- 10 Please see Chapter 2, Alternatives, for a description of potential reductions in development costs included in the Preferred Alternative. See Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 11 The proposal evaluated in this EIS is related to proposed changes to the Land Use Code for the construction of Accessory Dwelling Units. Implementation of subdivisions are not considered as part of the proposed Land Use Code changes and are outside the scope of this EIS.
- 12 Thank you for your comment. The comment is noted.
- 13 Thank you for your comment. The comment is noted.
- 14 Thank you for your comment. The comment is noted.
- 15 Thank you for your comment. The comment is noted.
- 16 Thank you for your comment. The comment is noted.
- 17 Thank you for your comment. The comment is noted.

5.6 Responses to Verbal and Written Comments Received at the Public Hearing

This section provides responses to verbal and written comments we received at the Draft EIS Public Hearing on May 31, 2018. Responses to verbal comments appear in the order that people commented. Appendix E includes a transcript of verbal comments and scanned copies of written comments we received at the hearing.

RESPONSES TO VERBAL COMMENTS SUBMITTED AT THE PUBLIC HEARING

Hosford, Shawn

- 1 Thank you for your comment. The comment is noted.

Johnston, Emily

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Please see Chapter 2, Alternatives, for a description of what is included related to reducing costs, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.
- 4 Thank you for your comment. The comment is noted.

Compton, Angela

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

Malaba, Patience

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

Bernstein, Laura

- 1 Thank you for your comment. The comment is noted.

Jones, Calvin

- 1 Thank you for your comment. The comment is noted.

- 2 Please see Chapter 2, Alternatives, for a description of what is included related to reducing costs, and Section 3.2, Planning Context, for a discussion of additional strategies the City may consider to reduce costs and increase the affordability of ADUs.

Ludwick, Rachel

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

Eric

- 1 Thank you for your comment. The comment is noted.

Lubarsky, Zach

- 1 Thank you for your comment. The comment is noted.

Ike, Elaine

- 1 Please see the frequent comment response concerning impacts on tree canopy and updated discussion of tree canopy in Section 4.2, Land Use.

Kaplan, Marty

- 1 Please see the frequent comment response regarding individual neighborhood review.

Shaner, Zach

- 1 Thank you for your comment. The comment is noted.

Lockhart, Alice

- 1 Please see the frequent comment response concerning the proposal's positive impacts.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

Newbold, Sheri

- 1 Thank you for your comment. The comment is noted.

Nourish, Bruce

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

Hutchins, Matt

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

Miles, Don

- 1 Thank you for your comment. The comment is noted.
- 2 Please see Section 4.3, Aesthetics, for graphics and text added related to development on a sloping site and Section 4.2, Land Use, which has been updated to include a discussion of historic resources. Please also see the frequent comment response concerning impacts to parking.
- 3 The Full Build-Out scenario was included only in the aesthetics analysis to illustrate a hypothetical redevelopment of all lots with the largest possible main house and maximum number of ADUs allowed. We do not expect this scenario to occur but include it here to illustrate the maximum scale of development allowed under each alternative. It is included for illustrative purposes only and is not an expected outcome of any alternative analyzed in this EIS.

Simpson, Jesse

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

Westgren, Jessica

- 1 Thank you for your comment. The comment is noted.

Pittenger, Glenn

- 1 Thank you for your comment. The comment is noted.

Cali, Larry

- 1 Thank you for your comment. The comment is noted.

Fessel, Andy

- 1 Thank you for your comment. The comment is noted.

Ilgenfutz, Kris

- 1 Thank you for your comment. The comment is noted.

Chapman, Paul

- 1 Thank you for your comment. The comment is noted.

DeLucas, Karen

- 1 Thank you for your comment. The comment is noted.

Wadsned, Ben

- 1 Thank you for your comment. The comment is noted.

Kahn, Marie

- 1 Thank you for your comment. The comment is noted.

Moehring, David

- 1 Please see the frequent comment response regarding suggestions for additional changes to the Land Use Code.
- 2 Thank you for your comment. The comment is noted.

Scruggs, Gregory

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.

Murphy, Megan

- 1 Thank you for your comment. The comment is noted.

Refer, Kelli

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

Williams, Bonnie

- 1 Thank you for your comment. The comment is noted.

- 2 Thank you for your comment. The comment is noted.
- 3 Thank you for your comment. The comment is noted.

Hirami, Eileen

- 1 Thank you for your comment. The comment is noted.

Bird, Denny

- 1 Thank you for your comment. The comment is noted.

Nachtigal, M.C.

- 1 Thank you for your comment. The comment is noted.

RESPONSES TO WRITTEN COMMENTS SUBMITTED AT THE PUBLIC HEARING

Murishia, Sean

- 1 Thank you for your comment. The comment is noted.

Smith, Brecca

- 1 Thank you for your comment. The comment is noted.

Jaeger, Sam

- 1 Thank you for your comment. The comment is noted.

Gudonis, Peter

- 1 Thank you for your comment. The comment is noted.
- 2 Thank you for your comment. The comment is noted.
- 3 Please see Chapter 2, Alternatives, for a description of the Preferred Alternative, which would eliminate the owner-occupancy requirement.
- 4 Thank you for your comment. The comment is noted.
- 5 Thank you for your comment. The comment is noted.

Zerrell, Tim

- 1 Thank you for your comment. The comment is noted.

Olwell, Carol

- 1 Thank you for your comment. The comment is noted.
- 2 The public has been afforded opportunities to comment on the proposal during the scoping period and Draft EIS public comment period. The City has made adjustments to the proposal based on feedback received as outlined in Chapter 1, Summary.
- 3 Thank you for your comment. The comment is noted.
- 4 Please see Chapter 2, Alternatives, for a description of the alternatives. The proposal would not eliminate the property owner's responsibility to comply with all applicable laws and regulations.
- 5 Thank you for your comment. The comment is noted.
- 6 Thank you for your comment. The comment is noted.
- 7 Thank you for your comment. The comment is noted.
- 8 Thank you for your comment.
- 9 Thank you for your comment. The comment is noted.