Background:
The draft Director’s Rule 9-2017 for Small Efficiency Dwelling Units (SEDU) outlines criteria that allows design flexibility to create living spaces smaller than required by Seattle Building Code (SBC) Section 1208.4 for Efficiency Dwelling Units (EDU), commonly called studio apartments, and provides a method for developers to achieve the 220 SF minimum unit size specified by the Seattle Land Use Code. (SEDU’s) are single, independent, residential units on one level consisting of one habitable room provided with natural light, a kitchen, bathroom, and closet within the unit, and an additional storage space anywhere within the building.

In response to comments received from architects on SEDU DR7-2016 and SDCI interpretations regarding SEDUs, and through the public process described below, a new draft Director’s Rule 9-2017 has been posted for public review and comment.

Description of Changes:

**DR7-2016**
- 150 SF single room with all portions of 150 SF meeting 7’ minimum horizontal dimension from floor to ceiling.
- Alternate: If the single room area is at least 120 net square feet, the balance shall be from an unobstructed floor area of an attached kitchen area whose width is not less than 5’-6” from backsplash wall to adjacent parallel wall
- Unit cannot exceed total gross unit floor size of 320 SF. Exception: Total gross unit size can be increased only to meet the minimum requirements for accessibility provisions for Type A units.

**DR9-2017 Draft**
- 120 SF single room with all portions of 120 SF meeting 7’ minimum horizontal dimension from floor to ceiling.
- Additional 30 SF occupiable space only having to meet the ceiling height requirements of SBC 1208.2 and be contiguous to the 120 SF habitable space.
- Unit cannot exceed total gross unit floor size of 320 SF and this Rule does not modify the required standards for Type A or Type B units.

Basic Unit Requirements (SBC 1208.4 and DR 9-2017):

<table>
<thead>
<tr>
<th>Dwelling Unit</th>
<th>Single Room</th>
<th>Other Habitable / Occupiable Spaces</th>
<th>Natural Light</th>
<th>Food Prep Area</th>
<th>Bathroom</th>
<th>Closet</th>
<th>Storage</th>
<th>Gross Unit Size</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>≥ 120 SF net floor area</td>
<td>≥ 70 SF* net floor area</td>
<td>Yes*</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>N/A</td>
</tr>
<tr>
<td>Efficiency Dwelling Unit (EDU)</td>
<td>≥ 220 SF</td>
<td>N/A</td>
<td>Yes*</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>N/A</td>
</tr>
<tr>
<td>Small Efficiency Dwelling Unit (SEDU)</td>
<td>≥ 120 SF</td>
<td>≥ 30 SF**</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>≤ 320 SF</td>
</tr>
</tbody>
</table>

*SBC allows an exception.  **Must be contiguous to 120 SF living room space.

During the process developing the new Director’s Rule, these issues and concerns were considered:

Concerns with the requirements and SDCI interpretations of DR 7-2016:
- 7’ in any plan dimension discourages innovation of adding design features that help smaller spaces work for occupants such as sleeping nooks, small home office areas, etc.
• 150 SF living area makes getting to 220 SF gross unit size virtually impossible, as developers stated they just couldn’t get a unit to 220 SF with the 150 SF as well as include the other required items such as the food prep area, bathroom, and closet.
• The Director’s Rule discourages good design since the Rule assumes that 150 SF of clear space is needed for placement of furniture and a designer could not show built-ins that served the same purpose as traditional furniture being placed in the 150 SF of clear space.

Concerns of altering DR7-2016:
• Create units that won’t meet FHA or accessibility standards for Type A & B Units.
• Drive up the inventory of units that may or may not be as attractive in the future as demographics and tastes change.
• Create new units but not necessarily affordable units.
• Put more pressure on neighborhoods that currently allow this type of development.
• Negatively impact occupant health through confined space living.

Health Standards:
• Representatives from academia spoke to the committee about Public Health principles and room sizes. They indicated that the minimum room size adopted in the national model codes wasn’t based on any empirical studies, just years of use and the professional judgement of experts. They discussed the innovation of modern medicines and technologies have eliminated some of the factors driving minimum room size requirements. In general, Public Health experts now believe denser housing with walkable neighborhoods is healthier housing.

Public Process (Construction Codes Advisory Board)
The Construction Codes Advisory Board (CCAB) is a 13-member volunteer board comprised of construction industry professionals and public members that is staffed by SDCI. CCAB provides advice and guidance on proposed code amendments and Director’s Rules that relate to technical codes.

SDCI asked CCAB to review DR7-2016 to see if modifications should be made to address the concerns of size limitations on SEDU’s while still ensuring the protection of health, life and safety. CCAB created a committee with 4 Board members and 7 other stakeholders, including architects that design SEDU’s, affordable housing developers, a renter/small housing advocate, a neighborhood representative and a former SDCI employee with residential code expertise, that were invited to participate on the committee provide recommendations to CCAB. The committee held several meetings, open to the public, that discussed a range of topics, as described above.

Several committee members submitted proposals for revising the Director’s Rule. Based on these proposals and committee discussions, recommendation was made, by majority vote of the committee, for the Construction Advisory Board to modify DR7-2016.

The committee felt the modified Director’s Rule would:
• Balance the profit motive of developers with the needs of occupants for livable space.
• Reflect changes in societal norms resulting from the sustainability and tiny home movements which make smaller units more generally acceptable to the public; and
• Acknowledge changing demographics seeking different housing options than those provided in suburban single family dwellings.

The Construction Code Advisory Board voted to approve the language developed by SDCI Technical Code staff for the draft DR9-2017, with one dissenting vote.