

(Date)

Aly Pennucci  
Council Central Staff

Dear Ms. Pennucci:

The Planning Commission appreciates the opportunity to provide our scoping comments for the Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS). We have been consistent supporters of Attached ADUs, often called in-law units, and Detached Accessory Dwelling Units (DADUs), also known as backyard cottages, as a means to provide a mix of housing types at more accessible prices to a wide range of people. ADUs ~~and DADUs~~ are also a means to help increase housing supply. This support has been clearly articulated in our June 2010 publication in partnership with the Department of Planning and Development, “A Guide to Backyard Cottages,” as well as our January 2014 “White Paper and Action Agenda on Family-Sized Housing.” ADUs ~~and DADUs~~ support many of the housing goals and policies in the City’s Comprehensive Plan and can provide alternatives in single-family neighborhoods for a variety of household types, including singles, families with children, and multi-generational households. We believe that removing some of the barriers to the construction of ADUs ~~could-would~~ provide more flexibility and accessibility for more ~~affordable~~ housing options in neighborhoods where homes are often unaffordable to many people.

The Planning Commission strongly supports changing regulations in the Land Use Code to remove barriers to the permitting and construction of ADUs in single-family zones. One of the July 2015 final recommendations by the Housing Affordability and Livability Agenda (HALA) Advisory Committee was to boost production of ADUs ~~and DADUs~~ by removing specific code barriers that make it difficult to build them. In March 2016, we submitted a preliminary comment letter to Councilmembers Rob Johnson and Mike O’Brien with our guidance and recommendations to encourage increased production of ADUs. We look forward to this effort moving forward with the preparation of an EIS to analyze the benefits and impacts of the proposed regulatory changes. The Planning Commission supports the analysis of the two alternatives as proposed and we offer the following comments on specific elements to be studied.

**Land Use.** Both alternatives are compatible with current Single-Family zoning. The Planning Commission is supportive of Alternative 2, which would modify the Land Use Code to encourage increased production of ADUs while maintaining many of the development standards that are applicable to structures on a Single-Family zoned parcel. Current City code states that a lot with or proposed for a single-family house may have only one accessory unit. Regulatory changes to be studied under Alternative 2 would modify the Land Use Code to allow both an ADU and a DADU on suitable lots with a single-family home as the primary unit. Another change to be studied under Alternative 2 would reduce the minimum lot size for a DADU from 4,000 square feet to 3,200 square feet ~~allow DADUs on lots of 3,200 square feet or greater~~. This change alone would make approximately 7,300 additional parcels eligible for construction of a DADU. To ascertain the cumulative impact of the proposed change, we suggest an analysis to quantify the potential number of single-family lots that could accommodate both an Attached ADU and a DADU, as compared to the number of lots that can have only one ADU under current regulations.

**Housing & Socioeconomics.** ADUs provide a greater diversity and supply of housing options in single-family zones. The Planning Commission recommends analyzing the both alternatives’ impact of potential for increasing affordable housing options ~~and, as well as the potential benefits of Alternative 2~~ allowing

flexibility for larger ADUs on changing household needs and families with children. We also recommend an analysis of the potential elimination of existing housing and ~~potential~~ displacement resulting from the proposed changes. Specifically, it would be helpful to understand from an economic feasibility perspective the potential of tearing down existing single-family homes and building new homes with an ADU and/or DADU on the same lot. Lastly, Given the current housing shortage in Seattle, the Planning Commission would like to see an increase in the number of ADUs contribute to long-term housing options rather than short-term rentals. We recommends an analysis to determine the economic likelihood of these regulatory changes resulting in an increase of short-term rental properties.

**Transportation.** Current regulations require one off-street parking space for each ADU unless the lot is in an urban village. The changes to be studied in the EIS propose to remove the requirement for an off-street parking space. To assess the potential impacts of this change, the Planning Commission recommends analyzing the amount of existing available on-street parking in single-family neighborhoods. We also recommend quantifying how many eligible single-family lots are within a 10-minute walk of frequent and reliable transit, as well as how many single-family lots have access to other multi-modal mobility options, such as the bike/pedestrian network, ~~carshare, bikeshare, etc~~ or other alternatives to single-occupancy vehicles. Lastly, the Planning Commission recommends an analysis to determine the number of eligible single-family lots in areas with planned pedestrian improvements according to the City's adopted Pedestrian Master Plan.

Thank you for considering our comments during the ADU EIS scoping process. Beyond the scoping of this EIS, the Planning Commission would like to offer our support for future studies to address the impacts of additional housing typologies in single-family zoned areas of Seattle. If you have any questions, please do not hesitate to contact me or our Executive Director, Vanessa Murdock, at 733-9271.