



**AIA**  
Seattle

November 16, 2017

Aly Pennucci  
City of Seattle  
P.O. Box 34025  
Seattle, WA 98124-4025

RE: ADU EIS Scoping Comments

Dear Ms. Pennucci:

**AIA Seattle**

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Thank you for the opportunity to respond to the scope of the EIS related to the city's proposed changes to the Land Use Code on ADUs/DADUs in single-family zones. AIA Seattle's members – around 2,000 architects and professionals working on the design of our city – care passionately about making better buildings and neighborhoods. We offer the following suggestions to ensure that the scope of the EIS thoroughly covers the original needs targeted by the proposed changes.

- I. Clearly identify the impacts to housing affordability as a result of each alternative.

This EIS is part of a larger effort related to HALA to increase housing affordability in the city – arguably the biggest crisis Seattle faces today. As a result, the evaluation of any change must focus on whether it increases affordable housing options throughout the city. For example, which alternative will produce more housing close to jobs? Which is more likely to provide more housing options at different price points?

We also believe that the EIS scope should identify and evaluate additional incentives that can produce even more housing, including:

- Waiving building permit fees for five years for ADUs and DADUs, as Portland has done.
- Allowing duplexes or triplexes in some single family zones.
- Assisting homeowners with the high costs of building ADUs and DADUs, such as allowing homeowners to qualify for MHA payments to build additional dwellings

In addition, we would like the EIS to consider whether each alternative might encourage actions that reduce affordable housing alternatives for permanent residents – such as speculative development that raises housing costs or the creation of short-term rental properties that eliminate options for long-term residents.

2. Include environmental impacts that are caused by any of the alternatives.

This EIS does not appear to include the environmental impacts of either alternative. We are particularly interested in understanding how each alternative will impact carbon emissions and help mitigate the impacts of climate change. This year Seattle adopted the goals of the Paris Accord and the city is working on ways to achieve them. As part of this effort, please consider the impacts to carbon emissions from any alternative studied under this proposal. We also encourage you to consider incentives that would facilitate building more green housing. Examples might include size or height bonuses for green buildings or green roofs.

3. Identify additional ownership structures that could positively impact housing affordability.

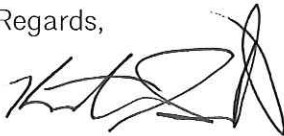
The housing crisis in Seattle is so severe that we need to be creative in identifying ways we can help mitigate it. We encourage the city to consider additional ownership structures that could positively impact housing affordability. Examples might include:

- Allowing homeowners to sell a DADU by dividing their parcel.
- Allowing required side yard setbacks for DADUs to be waived with an agreement between neighbors – similar to what is currently allowed for detached garages. Neighbors could economize their structures by building adjacent DADUs with a shared wall.

Finally, we suggest that definitions used in the descriptions of the alternatives be tightened. Especially helpful would be clear guidance on what is included in height limits or setbacks. For example, are handrails and parapets included in height limits, or are they excluded? Very specific guidance is helpful to our members as they work to create the best possible designs within the city's rules.

Thank you for the opportunity to comment on the scope of the ADU EIS. We are pleased to be part of the HALA process and to support the city's efforts to create a more equitable and sustainable city for all.

Regards,



Kirsten Smith  
Manager of Advocacy for the Built Environment