



**AIA**  
Seattle

June 25, 2018

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

RE: ADU Draft EIS Comments

Dear Ms. Pennucci:

AIA Seattle's members – over 2,300 architects and professionals working on the design of our city – care passionately about making better buildings and neighborhoods. We thank you for the opportunity to respond to the Draft EIS (DEIS) related to the city's proposed changes to the Land Use Code on ADUs/DADUs in single-family zones.

Reducing regulatory barriers to the production of additional ADUs and DADUs is a sensible, timely and necessary solution to help address housing scarcity, affordability and equity throughout Seattle's single family-zoned neighborhoods. ADUs can be: distributed widely and gradually; built for a variety of social and financial reasons; used to disincentivize teardowns; and built to assimilate within the context and fabric of any Seattle neighborhood. AIA Seattle is pleased to endorse elements of both Alternatives 2 and 3 in the city's DEIS; we believe these measures are essential to creating more opportunities for new dwellings to house Seattle's booming population.

#### **Determination of non-significance**

AIA Seattle concurs with the DEIS's determination of non-significance indicating that the ADU proposal does not have a significant adverse impact on the environment.

#### **Exclusionary zoning practices**

We applaud the city for including Chapter 3 in the DEIS, outlining the history and context of exclusionary and biased zoning practices that still reverberate today. Acknowledging this history is key to helping us avoid repeating the institutional biases that have shaped Seattle's development over time.

#### **Number of units**

We support the option to choose two accessory dwelling units either both as attached to the primary dwelling or one attached plus one detached.  
(Alternative 3)

#### **Parking**

We strongly endorse the elimination of the parking requirement for ADUs regardless of number. Providing parking is often expensive, unnecessary and in many cases infeasible. Eliminating the parking requirement will also prioritize vegetation and open area over vehicle storage. (Alternative 2)

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**Lot size**

We also support a reduction of minimum lot size for ADUs. Fourteen percent of Seattle lots fall below the current lot size threshold and these are often in neighborhoods with the best access to transit, schools, parks and jobs. (Alternatives 2 and 3)

**Roof allowances**

We support incremental increases in size and height allowances and options for roof features such as dormers and green roofs. (Alternative 2)

**Rear yard coverage**

AIA Seattle endorses the DEIS's comments on allowing additional rear yard coverage for single story DADUs. Greater rear yard coverage provides additional flexibility in design and allows designers the opportunity to design ADA-compliant DADUs that allow existing homeowners, or their parents, to age in place while being part of the community. (Alternatives 2 and 3)

**Floor area**

We support increasing the allowed gross floor area and allowing both attached and detached accessory dwelling units to be the same size. This small increase will allow two-bedroom units that are needed by families. 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 could be used to reduce illegal conversions. (Alternative 2)

**Cost reduction & permit streamlining**

We strongly support measures to reduce pre-development costs and to streamline permitting by dedicating specialized reviewers to ADU/DADU projects. These measures are important so that ADUs can be brought online as quickly as possible to help address Seattle's current housing crisis. (Alternative 2)

**Maximum size**

Finally, we encourage the city to study a potential maximum size for new principal structures through FAR or other means while incentivizing the creation of ADUs and DADUs by refraining from limiting the additional unit size. Adding additional FAR bonuses for green building or specific site conditions such as alley and corners could also be a component of this study. AIA Seattle would be happy to partner with the city to help perform this research.

Again, we thank you for the opportunity to comment on the scope of the DEIS. We are pleased to support this effort, the HALA process and the city's other work to create a more equitable and sustainable city for all.

Regards,

A handwritten signature in black ink, appearing to be 'LR' with a flourish.

Lisa Richmond  
Executive Director

A handwritten signature in black ink, clearly legible as 'Sidney Scarboro'.

Sidney Scarboro  
President