



**SHORELINE  
CITY COUNCIL**

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January 28, 2020

The Honorable Joe Fitzgibbon, Chair  
Members of the House Environment and Energy Committee

RE: HB 2570 – Requiring ADU policies to be adopted

Dear Chair Fitzgibbon and members of the committee:

Thank you for the opportunity to submit my testimony with concerns on HB 2570.

I have served on the Shoreline City Council since 2009. I represent cities on the Puget Sound Partnership Ecosystem Coordination Board and I served on the Southern Resident Killer Whale Task Force. I also spent twenty years doing planning and land use work for local governments.

While I strongly agree that we need to increase the supply of housing to keep up with increasing demand, I also strongly feel that we need to do it in ways that support our environmental, mobility, and equity goals.

New construction of detached ADUs does not do that. If the legislation only promoted attached ADUs in existing buildings, I could support it. Instead, it promotes construction of new, detached ADUs. While the provisions in the bill are largely reasonable, and the City of Shoreline already allows ADUs in our residential zones consistent with most of the recommended standards, I cannot support a bill that would undermine our environmental, climate, mobility, and equity goals.

Claims that ADUs are good for affordability, climate, and economic security assume that the only alternative to ADUs are newly constructed large houses. That assumption is not correct, and the arguments supporting ADUs fall apart when you correct that false assumption. The better alternative is to increase the supply of apartments and condominiums near transit. That alternative is better than ADUs for affordability, opportunity, flexibility, housing stability, sustainability, mobility, and equity.

*Affordability.* The cost per unit for apartments would still be less than for detached ADUs even with all of the cost reduction measures in the bill. While condominium liability is still an issue, the legislature made progress last year. If the goal is increasing the housing supply at a low cost in order to meet demand for market rate housing, doesn't it make more sense to promote the less expensive form of construction?

*Opportunity.* There is nothing in the bill that ensures that ADUs will be near jobs, schools, transit, and parks. Although the parking provision is different near fixed guideway transit, that is the only locational consideration other than city size and UGA. Zoning for higher density apartments and condominiums, on the other hand, can be and is done by most cities with careful attention to location. There is also nothing in the bill that ensures that ADUs would be affordable to people of all incomes, and there is no way to require affordability as there is with the multifamily property tax exemption program. While some ADUs may be very affordable, rental rates are set by the market. Even if the bill allows new ADUs to be built at a lower cost, they would still be rented at market rate, so it just gives greater income to the homeowner. Supply and demand set rental rates. Since land is scarce in the UGA, it is easier, faster, and more efficient to significantly increase housing supply with multifamily construction.

*Flexibility.* Apartments and condominiums with level entries and elevators are more accessible than ADUs. Condos would allow more homeowners to stay in their community long after they stop mowing a lawn, walking up stairs, and rolling trash bins to the curb. ADUs only allow people in a community when they are still independent and affluent enough to live in their own place. As we age, many of us need care that can be provided in a group or community setting more effectively and at a lower cost than in a detached home. So ADUs are not the best solution for aging in place whether you own or rent.

*Housing Stability.* To the extent that this provides economic and housing security to a homeowner, it raises an equity issue that I will address below. To the extent it provides a benefit to potential renters of an ADU, apartments provide a less expensive option in better locations close to jobs and transit. Low income families would benefit more from apartments than detached ADUs, and middle income families would benefit from being able to buy into a condominium market at a lower cost than new detached construction.

*Sustainability.* The argument to promote construction of detached ADUs turns out to be completely backwards when you compare them to new apartments instead of only comparing them to new single family detached houses. We need to increase density and energy efficiency beyond what we are currently achieving even in our higher density areas. Going from 6 units per acre to 8 or 12 units per acre doesn't help. In fact, it slows the transition to even higher density by encouraging reinvestment in an inherently inefficient and expensive subdivision form of building.

The per unit energy consumption of new detached ADUs is higher than new apartments or condos. To reach our climate goals, we need to dramatically reduce the carbon footprint of buildings. Retrofitting existing buildings is expensive compared to making them energy efficient when first built. Detached units are inherently inefficient with heating and cooling loss through

all six sides. Shoreline recently strengthened our climate goal to reduce emissions in our city to a level consistent with avoiding a 1.5 degree increase in temperature. The state is considering updating the state climate goals to match this. We can't reduce our GHG emissions if we keep building inefficient buildings, so we should focus on attached housing instead of ADUs.

In addition to energy, the consumption of trees and open space per ADU is many times higher than multistory apartments or condos. Why waste 1,500 square feet of open space to build one unit when you could stack six housing units on the same space?

*Mobility.* To cut traffic and commutes we need to locate a lot more housing near transit. Instead of just adding a few ADUs where a homeowner decides to do it, we should be planning to accommodate all of our future housing needs near transit lines, and that can only be done with higher densities than ADUs can provide. Even if every property owner builds an ADU on every lot in a legacy neighborhood with existing density of 6 units per acre, that only gets us to 12 units per acre. Experts don't generally consider that a transit-supportive density. So increasing ADUs would increase vehicle miles traveled and make traffic worse, not better. In addition to the climate and environmental impacts, that has nasty implications for our transportation system and budgets.

*Equity.* I've learned a lot about redlining since taking office. I've learned a lot about institutional racism. I strongly encourage the Legislature to look at housing through that lens and reconsider supporting policies that may inadvertently carry forward injustices from the past, both racial and economic. Homeowners, including me, are already benefiting from capital appreciation while renters are not. Historical policies reinforced this divide, helping the rich (white) get richer while extracting income from the poor. Current policies, in many cases, inadvertently carry forward this injustice.

Even if we leave institutional racism aside, ADUs are not as good for equity and low income families as appropriately zoned higher density housing near transit. We need to think about people who cannot or choose not to drive. For them, we need to put more housing near transit, not scattered throughout car-dependent legacy subdivisions. We need to think about people who cannot afford to rent or buy a newly constructed detached unit. There is no practical way to build an affordability requirement into ADUs that are built individually. We can require, and Shoreline already does require, affordable units to be included in higher density developments near transit, ensuring that we increase the supply of housing for people at a range of incomes and locating that housing near high capacity transit.

I ask that you seriously consider all of this. We already have problems with mobility, equity, and the environment. The climate crisis threatens our economy and our children's quality of life. We must move beyond the post-war, legacy belief that we are all somehow entitled to our own house, large or small. There isn't enough room. There aren't enough resources. If we continue to choose to grow our state population (and it is a choice), then we should aim to put all future growth immediately adjacent (that is, walking distance) to job centers and high capacity transit in buildings that approach net zero energy. Anything else just makes things worse.

Thank you for your hard work and dedication to making our state a better place.

Sincerely,

A handwritten signature in black ink that reads "Will Hall". The signature is written in a cursive, flowing style.

Will Hall, Mayor