



# KING COUNTY

1200 King County Courthouse  
516 Third Avenue  
Seattle, WA 98104

## Signature Report

### Motion 16194

**Proposed No.** 2022-0256.1

**Sponsors** Perry

1           A MOTION acknowledging receipt of the Townhouse  
2           Accessory Dwelling Unit Analysis report, in response to  
3           the 2021-2022 Biennial Budget Ordinance, Ordinance  
4           19210, Section 87, Proviso P2.

5           WHEREAS, the 2021-2022 Biennial Budget Ordinance, Ordinance 19210,  
6           Section 87, Proviso P2, states that \$75,000 of the appropriation "shall not be expended or  
7           encumbered until the executive transmits a townhouse accessory dwelling unit analysis  
8           report and a motion that should acknowledge receipt of the report and a motion  
9           acknowledging receipt of the report is passed by the council," and

10           WHEREAS, King County has adopted the Equity and Social Justice Strategic  
11           Plan with the goals of promoting equity within decision making processes, and

12           WHEREAS, King County is committed to mitigating the potential effects of  
13           displacement, especially in the county's identified priority communities;

14           NOW, THEREFORE, BE IT MOVED by the Council of King County:

Motion 16194

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- 15 The council acknowledges receipt of the Townhouse Accessory Dwelling Unit  
16 Analysis Report, Attachment A to this motion.

Motion 16194 was introduced on 7/12/2022 and passed by the Metropolitan King County Council on 9/6/2022, by the following vote:

Yes: 9 - Balducci, Dembowski, Dunn, Kohl-Welles, Perry,  
McDermott, Upthegrove, von Reichbauer and Zahilay

KING COUNTY COUNCIL  
KING COUNTY, WASHINGTON

DocuSigned by:

*Claudia Balducci*

7E1C273CE9994B6...

Claudia Balducci, Chair

ATTEST:

DocuSigned by:

*Melani Pedroza*

8DE1BB375AD3422...

Melani Pedroza, Clerk of the Council

**Attachments:** A. Townhouse Accessory Dwelling Unit Analysis Report, June 30, 2022

**Townhouse Accessory Dwelling Unit**  
**Analysis Report**

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June 30, 2022



**King County**

## I. Contents

|      |   |    |
|------|---|----|
| II.  | Proviso Text.....   | 3  |
| III. | Executive Summary.....  | 4  |
| IV.  | Background .....  | 6  |
| V.   | Racial Equity Analysis of the Changes to Accessory Dwelling Unit Regulations for Townhomes .... | 11 |
|      | Utilization of Office of Equity and Social Justice and Other Tools.....                         | 11 |
|      | Consultant Findings .....   | 12 |
| VI.  | Conclusion.....   | 14 |
| VII. | Appendices.....   | 16 |

## II. Proviso Text

Ordinance 19210, Section 87, Department of Local Services, P2, as amended by Ordinance 19364<sup>1, 2</sup>

### ER3 EXPENDITURE RESTRICTION:

Of this appropriation, \$50,000 shall be expended or encumbered solely to support a townhouse accessory dwelling unit analysis report as described in Proviso P2 of this section.

### P2 PROVIDED FURTHER THAT:

Of this appropriation, \$75,000 shall not be expended or encumbered until the executive transmits a townhouse accessory dwelling unit analysis report and a motion that should acknowledge receipt of the report and a motion acknowledging receipt of the report is passed by the council. The motion should reference the subject matter, the proviso's ordinance number, ordinance section and proviso number in both the title and body of the motion.

The report shall include racial equity analysis of the changes to accessory dwelling unit regulations for townhomes adopted by the 2020 King County Comprehensive Plan update using tools from the office of equity and social justice.

The executive should electronically file the report and motion required by this proviso no later than June 30, 2022, with the clerk of the council, who shall retain an electronic copy and provide an electronic copy to all councilmembers, the council chief of staff and the lead staff for the mobility and environment committee, or its successor.

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<sup>1</sup> Ordinance 19210 [\[LINK\]](#), p. 57, p. 58-59

<sup>2</sup> Ordinance 19364 [\[LINK\]](#)

### III. Executive Summary

Ordinance 19210 contained a budget proviso that requested a “racial equity analysis of the changes to accessory dwelling unit regulations for townhomes adopted by the 2020 King County Comprehensive Plan update using tools from the office of equity and social justice.” The proviso is due to the King County Council by June 30, 2022.

King County declared racism a public health crisis on June 11, 2020. King County has made commitments, via the King County Strategic Plan and Equity and Social Justice (ESJ) Strategic Plan, to advance equity and social justice. Assessing code changes and modifying them to eliminate racially inequitable impacts advances equity and counters the public health crisis.

The King County Comprehensive Plan contains policies that direct the County to provide a range of affordable housing types, as well as to consider equity and social justice in the County’s planning. Ordinance 19146 made a variety of changes to the King County Code, including an update to section 21A.08.030 of the Zoning Code that allows townhouses to have detached accessory dwelling units (ADUs). Previously, ADUs were only allowed on properties developed with single detached dwellings.<sup>3</sup> The code changes increased flexibility around zoning standards, lowering barriers to developing ADUs to increase affordable housing.

The racial equity analysis used the King County Office of Equity and Social Justice's (OESJ's) Equity Impact Review Process.<sup>4, 5</sup> Determining the racial equity impacts of the code change was based on data showing: 1) areas in King County where communities of color would be vulnerable to displacement; and 2) areas where townhouses (including those with ADUs) are most likely to occur.

The analysis incorporated multiple types of demographic data. It relied on research from the University of California, Berkeley’s Urban Displacement Project to incorporate data on income levels and housing market prices.<sup>6</sup> Together, this data indicated the areas in King County where communities of color could be vulnerable to displacement. A development feasibility analysis determined where ADU development would be most likely to occur.

Project oversight was provided by a steering team, which included staff from the Department of Local Services (DLS), the Department of Community and Human Services (DCHS), the Office of Equity and Social Justice (OESJ), and the Office of Performance, Strategy, and Budget (PSB). The project steering team guided the work of the consultant. The selected proposal was submitted by ECONorthwest, a firm with substantial experience and recognized expertise in housing policy and socioeconomic research.<sup>7</sup> The consultant was hired to perform the racial equity analysis.

The consultant report found that there is a risk of disparate impact, on the basis of race, due to code changes allowing ADUs on properties developed with townhouses. The consultant report also found that across King County, “the allowances for ADUs are not likely to significantly increase the likelihood of development of townhouses that otherwise would not have occurred without the new ADU

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<sup>3</sup> King County Code 21A.08.030 [\[LINK\]](#)

<sup>4</sup> Office of Equity & Social Justice Tools and Resources [\[LINK\]](#)

<sup>5</sup> 2015 Equity Impact Review Process Overview [\[LINK\]](#)

<sup>6</sup> Urban Displacement Project [\[LINK\]](#)

<sup>7</sup> ECONorthwest [\[LINK\]](#)

allowance".<sup>8</sup> However, despite the low likelihood of increased development across all of the six unincorporated communities *combined*, the unincorporated communities had differing levels of displacement vulnerability and development potential *individually*. Two of the six communities (North Highline and Skyway-West Hill) were projected to experience both greater displacement vulnerability and development potential, leading to disparate impacts on the basis of race.

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<sup>8</sup> Ordinance 19364 [\[LINK\]](#), p. 19

## IV. Background

### Department Overview

King County is the local service provider for the estimated 247,000 people who live in the unincorporated areas of King County.<sup>9</sup> The Department of Local Services (DLS), created in 2018 by Ordinance 18791, is dedicated to improving local services for unincorporated areas by improving coordination and collaboration between County agencies, communities, and other entities.<sup>10</sup> The mission of DLS is to promote the well-being of residents and communities in unincorporated King County by seeking to understand their needs and delivering responsive local government services. DLS includes two divisions:

- The Roads Services Division is responsible for all County-owned roads, bridges, and related infrastructure in the unincorporated areas of King County.
- The Permitting Division provides infrastructure and land use planning services; land use, building, and fire regulatory and operating permits; code enforcement; and a limited number of business licenses in unincorporated areas of the county. The Permitting Division is responsible for maintaining and implementing Title 21A (“the Zoning Code”) of the King County Code, where development regulations can be found.

### Community Service Areas

In 2011, with guidance from the County’s 2010-2014 Strategic Plan, the County created seven Community Service Areas (CSAs) to represent all unincorporated residents and communities.<sup>11</sup>

1. Bear Creek/Sammamish
2. Snoqualmie Valley/Northeast King County
3. Four Creeks/Tiger Mountain
4. Greater Maple Valley/Cedar River
5. Southeast King County
6. West King County
7. Vashon/Maury Island

West King County is further divided into five potential annexation areas: East Federal Way, East Renton, Fairwood, North Highline, and Skyway-West Hill.

### Key Context:

*Equity* - The King County Strategic Plan presents a vision for “King County where all people have equitable opportunities to thrive.”<sup>12</sup> This vision is consistent with and furthered by the 2016-2022 Equity and Social Justice (ESJ) Strategic Plan, which contains four strategies to advance equity and social justice that include investing:

- Upstream and where the needs are greatest
- In community partnerships
- In employees
- With accountable and transparent leadership<sup>13</sup>

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<sup>9</sup> Statistical Profile on Unincorporated King County, 2018 [\[LINK\]](#)

<sup>10</sup> Ordinance 18791, p. 25 [\[LINK\]](#)

<sup>11</sup> 2010-2014 King County Strategic Plan (King County Executive Office) [\[LINK\]](#)

<sup>12</sup> 2020 Update to the 2016 King County Comprehensive Plan [\[LINK\]](#)

<sup>13</sup> Equity and Social Justice Strategic Plan, p.4 [\[LINK\]](#)



The equity and social justice shared values that guide and shape King County’s work are:

- Inclusive and collaborative
- Diverse and people focused
- Responsive and adaptive
- Transparent and accountable
- Racially just
- Focused upstream and where the needs are greatest<sup>14</sup>

King County declared racism a public health crisis on June 11, 2020.<sup>15</sup> All of King County government is committed to implementing a racially equitable response to this crisis, centering on community.

The Equity Impact Review process (EIR) is a tool to help departments across the County identify, evaluate, and communicate the potential impact - both positive and negative - of a policy or program on equity.<sup>16</sup> The EIR process requires that planning and analyses consider and apply the following equity frameworks:

- Distributional Equity: Fair and just distribution of benefits and burdens to all parties;
- Process Equity: Inclusive, open, and fair process with meaningful opportunities for input; and
- Cross-generational Equity: Consideration of effects of current actions on future generations.<sup>17</sup>

*Comprehensive Plan* - This report is guided by current King County Comprehensive Plan policies. Specific Comprehensive Plan policies applicable to this document include:

- Policy H-125, requiring that King County provide a range of affordable housing types, including higher-density single-family homes, multifamily properties, manufactured housing, cottage housing, accessory dwelling units and mixed-use developments;<sup>18</sup>
- Policy H-126, requiring King County to provide opportunities for attached and detached accessory dwelling units in urban residential areas;<sup>19</sup> and
- Policy U-201a, requiring King County to consider equity and social justice in its planning, project development, and service delivery approach.<sup>20</sup>

Ordinance 18810 adopted the 2020 Comprehensive Plan update, which included a recommendation to amend the County’s accessory dwelling unit (ADU) regulations.<sup>21</sup> Ordinance 19146 made a variety of changes to the King County Code, including an update to the Zoning Code that allowed townhouses to have ADUs. ADUs may be attached to the primary unit or detached from it. The combination of

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<sup>14</sup> Ibid, p. 16

<sup>15</sup> Racism as a Public Health Crisis in King County [\[LINK\]](#)

<sup>16</sup> King County Equity Impact Review Tool [\[LINK\]](#)

<sup>17</sup> Office of Equity and Social Justice Equity Impact Review Process Overview [\[LINK\]](#)

<sup>18</sup> King County Comprehensive Plan, p. 4-11 [\[LINK\]](#)

<sup>19</sup> Ibid

<sup>20</sup> Ibid, p. 2-39

<sup>21</sup> Ordinance 18810 [\[LINK\]](#)

pertinent regulations—existing ADU regulations newly applied to townhouse ADUs and entirely new regulations—can be found starting on line 1613 of Ordinance 19146 (Section 43.7a).<sup>22</sup>

During the Council’s consideration of the above legislation, concerns were shared that the amendment could create disproportionate adverse impacts on the basis of race, and such equity impacts should be analyzed (Appendix B). A proviso was therefore added to the 2021-2022 Biennial Budget Ordinance (Ordinance 19210) requiring the Department of Local Services to analyze the racial equity impacts.<sup>23</sup>

Prior to the development regulation updates adopted under Ordinance 19146, King County only allowed ADUs on lots with a single detached dwelling. ADUs were required to be located in the same building as the primary dwelling unit. Under these standards, for example, a basement unit or "mother-in-law" unit above a garage would be allowed, but an ADU within a backyard cottage would not.

Ordinance 19146 allows ADUs to be located on lots developed with townhouses, in addition to single detached dwellings, and allowed ADUs to be either attached or detached (e.g., located in a backyard cottage). The Ordinance also:

1. reduces the minimum lot size required to develop a detached ADU, meaning more properties would be eligible to add ADUs;
2. adds a requirement that either the primary or accessory dwelling unit be occupied either by the owner of the primary dwelling unit or by an immediate family member of the owner; and
3. raises the maximum floor area limit for ADUs by removing the floor area contained in basements from the calculation of floor area maximum.

**Report Development Methodology:** In June 2021, DLS issued a Request for Qualifications for firms to analyze the racial equity impacts of changes to the County’s zoning code to allow ADUs to be constructed in, or on the same lot as, townhouses. The selected proposal was submitted by ECONorthwest, a firm with substantial experience and recognized expertise in housing policy and socioeconomic research.

The consultant team began its work in July 2021, concluding in December 2021. Project oversight was provided by a steering team which included staff from DLS, the Department of Community and Human Services (DCHS), the Office of Equity and Social Justice (OESJ) and the Office of Performance, Strategy and Budget (PSB).

With concurrence from OESJ, the steering and consultant teams began outreach early in the process. The steering team also determined that racial equity impacts were likely to be manifested in terms of displacement, and that displacement would occur in areas where development would be more likely to occur. It concluded that conducting focused engagement with housing advocacy groups, developers, and providers would yield the most robust information to inform this Proviso response.

Participants in the outreach meetings included:<sup>24</sup>

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<sup>22</sup> Ordinance 19146 [\[LINK\]](#)

<sup>23</sup> Ordinance 19210 [\[LINK\]](#)

<sup>24</sup> Multiple efforts were made by DLS to engage the South King County Housing and Homelessness Partnership (SKHHP) in this work.

- **Housing Development Consortium (HDC)** – a local housing advocacy group, who drafted the initial letter stating their concerns which resulted in this Proviso;<sup>25</sup>
- **White Center Community Development Association (WCCDA)** – a non-profit group that promotes economic development in the North Highline and White Center area;<sup>26</sup>
- **Master Builders of King and Snohomish Counties (MBAKS)** – a membership association for the building industry in the region, who advocated for the change in code that precipitated this analysis;<sup>27</sup>
- **Green Canopy** – a developer of affordable and market-rate townhouse products who has constructed townhouses, including some with ADUs; and<sup>28</sup>
- **A Regional Coalition for Housing (ARCH)** – an affordable housing agency, mostly serving King County east of Lake Washington.<sup>29</sup>

The steering team found that while countywide metrics, such as demographic and real estate data, were useful for identifying general trends, they were not useful for identifying racial equity impacts of the changes to ADU regulations for townhomes. Countywide metrics also include areas of the County where townhouses cannot be built according to the zoning code, thereby diluting data on the impacts of the subject zoning code change. Further, averaging out demographic data across the County obscured racial equity impacts within specific geographic areas. It was therefore determined to study several discrete neighborhoods within unincorporated King County. This allowed the teams to focus on potential disparate impacts based on race, which was not possible using a larger geographic scale.

The team examined six unincorporated communities for specific racial equity impacts. The selected communities are located in zones that allow for townhouse development, which is generally allowed

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<sup>25</sup> Housing Development Consortium [\[LINK\]](#)

<sup>26</sup> White Center Community Development Association [\[LINK\]](#)

<sup>27</sup> Master Builders of King and Snohomish Counties [\[LINK\]](#)

<sup>28</sup> Green Canopy [\[LINK\]](#)

<sup>29</sup> A Regional Coalition for Housing [\[LINK\]](#)

only in the urban area and rural towns, but not the rural area where such development patterns are prohibited.<sup>30, 31, 32,33</sup> The selected communities included:

- Fairwood Subarea
- Fall City Rural Town
- Redmond Ridge Subarea
- North Highline Subarea
- Skyway-West Hill Subarea
- Vashon Rural Town

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<sup>30</sup> Urban areas are the portions of unincorporated King County within the Urban Growth Area, defined as follows in the King County Comprehensive Plan: "The Growth Management Act requires King County's Comprehensive Plan to designate an Urban Growth Area, where most future urban growth and development is to occur to limit urban sprawl, enhance open space, protect Rural Areas and Natural Resource Lands, and more efficiently use human services, transportation and utilities. The Comprehensive Plan designates an Urban Growth Area which includes areas and densities sufficient to permit the urban growth that is projected to occur in the county for the succeeding 20-year period." [\[LINK\]](#) p. G-30

<sup>31</sup> Rural Towns are defined in the King County Comprehensive Plan as: "unincorporated towns governed directly by King County. They provide a focal point for community groups such as chambers of commerce or community councils to participate in public affairs. The purposes of Rural Town designations within the Comprehensive Plan are to recognize existing concentrations of higher density and economic activity in Rural Areas and to allow modest growth of residential and economic uses to keep them economically viable into the future." [\[LINK\]](#) p. G-24

<sup>32</sup> Rural Area is defined in the King County Comprehensive Plan as: "The Growth Management Act requires that counties designate a Rural Area in order to conserve the rural character and quality of the existing rural lands in Washington. King County's Rural Area refers collectively to the geography that primarily contains the following land use categories – Rural Towns, Rural Neighborhood Commercial Centers, and Rural Area (RA-2.5, RA-5, RA-10 and RA-20) in unincorporated King County. The Rural Area geography also includes a limited amount of acreage with land use categories such as Industrial, Commercial Outside of Center, etc. The Rural Area geography does not include designated Natural Resource Lands, although resource activities occur on them. The Rural Area contains very low-density residential development, commercial and industrial development, farms, forests, watersheds crucial for both fisheries and flood hazard management, mining areas and towns, historic sites and buildings, archaeological sites and regionally important recreation areas." [\[LINK\]](#) p. G-23

<sup>33</sup> K.C.C. 21A.08.030 [\[LINK\]](#)

## V. Racial Equity Analysis of the Changes to Accessory Dwelling Unit Regulations for Townhomes

### Utilization of Office of Equity and Social Justice and Other Tools

As noted above, OESJ provides tools to King County departments for examining the equity implications of decisions and other actions under consideration. These tools include the Equity Impact Review (EIR) process, Community Engagement and Language Access guides, and the COVID-19-related Equity Impact Awareness Tool.

For the purpose of conducting the racial equity analysis required by the Proviso, ECONorthwest used the EIR process in the development of its work (Appendix A). Interviews with a cross section of interested organizations provided community context and first-hand knowledge of priorities and concerns. Participants included: A Regional Coalition for Housing (ARCH), the White Center Community Development Association (WCCDA), the Master Builders Association of King and Snohomish Counties (MBAKS), the Housing Development Consortium (HDC), and Green Canopy. Participant feedback is detailed in the consultant report in Appendix A. Key themes from participant feedback are summarized here. Themes included:

- Concern that the County zoning code provision that removed basement floor area from the calculation of maximum floor area could increase development likelihood, which could in turn increase displacement risk.
- Concern that the additional ADUs constructed under the new zoning code might be used as short-term rentals, thereby increasing displacement risk without simultaneously increasing the supply of long-term rental housing.
- Interest and uncertainty regarding separating the ownership of ADUs from townhouses, which could create more affordable homeownership opportunities. The County's zoning code requires that either the townhouse or ADU be occupied by the property owner or by an immediate family member (typically called an "owner occupancy requirement"). This led to uncertainty as to whether separate ownership of the units could be allowed.
- Concern that the County zoning code's owner occupancy requirement could deter potential buyers who anticipate needing to relocate for jobs or other reasons, leading to a smaller pool of potential buyers than there would be without the owner occupancy requirement.
- Concerns about potential negative impacts on the pedestrian environment and neighborhood character due to this zoning code change.
- Estimation that use of the new zoning code provision was likely to be low.

The consultant team adapted and utilized OESJ's Equity Impact Awareness Tool for COVID-19 quarantine and recovery sites to conduct the racial equity analysis. The Tool incorporates multiple types of demographic data and indicators relevant to economic resiliency, including the racial makeup of a given community, the prevalence of households below the federal poverty level, and homeownership levels. Although the Equity Impact Awareness Tool utilized for this project was originally developed for different subject matter, it is applicable to this work because the variables that make communities vulnerable to the economic impacts of COVID-19 are also those that cause people to be vulnerable to other forms of economic hardship, such as displacement. The Tool was chosen for this project because it

provides a method for understanding the relative vulnerability of communities. The Tool was used to develop a composite score that indicated vulnerability to equity impacts.

In addition to using OESJ tools for this report, the consultant team incorporated research from the University of California, Berkeley's Urban Displacement Project (UDP). UDP seeks to "understand and describe the nature of gentrification, displacement, and exclusion, and also to generate knowledge on how policy interventions and investment can support more equitable development."<sup>34</sup> This work complemented the Equity Impact Awareness Tool by incorporating data specifically related to housing market dynamics, including data on income levels, the change in income over time, and housing market prices. The racial equity data incorporated into OESJ's Equity Impact Awareness Tool, combined with the housing market analysis provided by the UDP, provided a picture of the vulnerability to displacement overlain on racial demographic data. This data in turn informed the racial equity analysis described in the Consultant Findings sections that follows.

### Consultant Findings

For the purpose of understanding racial equity impacts, impact was measured in terms of displacement risk due to development pressure caused by the expected effects of the code change allowing ADUs on properties developed with townhouses. To understand displacement risk through the lens of race, the consultant team analyzed two indicators to identify potential disparate impacts:

- 1) Areas in King County where there are communities of color that could be vulnerable to displacement
- 2) Areas where townhouses (including those with ADUs) are most likely to occur

The first indicator listed above was determined using the OESJ's Equity Impact Awareness Tool combined with the Urban Displacement Project analysis. Together, these tools showed vulnerability to displacement when combined with racial demographic data within the report study areas.

The second indicator was determined by conducting a development feasibility analysis, which identified areas where townhouses, specifically those with ADUs, would be most likely to occur, and therefore where development pressure was most likely to be exerted. The development feasibility analysis factored in the costs of meeting zoning standards (i.e., constructing a building that would meet height and size requirements, provide sufficient space for parking, and provide required open space) with the revenue that could be derived from the townhouse (i.e., rental income). If costs exceed revenue, development is infeasible; if revenue exceeds costs, development is feasible. When data on local land values is combined with the development feasibility analysis, a location-specific likelihood of redevelopment emerges.

Using indicator data as above for 1) areas in King County where there are communities of color that could be vulnerable to displacement; and 2) areas where townhouses (including those with ADUs) are most likely to occur, the consultant finds a risk exists for disparate impact on the basis of race due to the code change allowing ADUs on properties developed with townhouses. The consultant report also finds that across King County, "the allowances for ADUs are not likely to significantly increase the likelihood of development of townhouses that otherwise would not have occurred without the new ADU

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<sup>34</sup> Urban Displacement Project [\[LINK\]](#)

allowance".<sup>35</sup> However, despite the low likelihood of increased development across all of the six unincorporated communities *combined*, the unincorporated communities demonstrated individual differing levels of displacement vulnerability and development potential. Two of the six communities are projected to experience both greater displacement vulnerability and development potential, leading to potentially disparate impacts on the basis of race: Skyway-West Hill and North Highline. See Figure 1 below.

Figure 1: Equity Impact Results<sup>36</sup>



North Highline is identified as the community most likely to experience increased development pressure due to the proposed code change. It is home to relatively high Black, American Indian, Alaska Native, and Latinx populations vulnerable to displacement compared to other areas. In this neighborhood, the consultant report notes that there could be a "marginal increase in the ability for townhouses with ADUs to pay for land due to the regulation changes", meaning that redeveloping properties with townhouses would be marginally more favorable than it would be without the code change.<sup>37</sup> North Highline is also classified as being susceptible to gentrification by the UDP analysis.<sup>38</sup>

Skyway-West Hill is also identified as likely to experience increased development pressure due to the proposed code change. It is also home to relatively high Black, American Indian, Alaska Native, and

<sup>35</sup> Ibid, p. 19

<sup>36</sup> Ibid, p. 23

<sup>37</sup> Ibid, p. 24

<sup>38</sup> Ibid, p. 25

Latinx populations vulnerable to displacement compared to other areas, although to a lower degree than North Highline.<sup>39</sup>

The other four unincorporated communities (Fairwood Subarea, Fall City Rural Town, Redmond Ridge Subarea, and Vashon Rural Town) are found to have a low risk of disparate impact based on race, due to low displacement risk and/or low development likelihood of ADUs in townhouses.<sup>40</sup>

The consultant report also identified potential positive and negative impacts of allowing ADUs in townhouses across King County, although these impacts did not undergo the same racial equity impact analysis to assess displacement risk and development pressure.

Positive impacts:

- Adds a source of income for homeowners if they build and rent out an ADU. This could increase the ability for a household to stay in their home in a gentrifying neighborhood by creating an additional source of household income.
- Increases the value of the home.
- Creates flexibility for a growing or multigenerational family by allowing for additional and separate living spaces.
- Increases the amount of rental housing in areas with limited supply.
- Provides flexibility for public or non-profit programs providing affordable and middle-income housing by allowing development of larger townhouse units to serve larger household sizes while also providing more units and types. Organizations that already have townhouses in their portfolios could retrofit them to create additional units on existing sites.

Negative impacts:

- Lowers revenue from impact fees because ADUs are exempt from paying them. This could mean less revenue for schools as compared to if those same housing units were constructed as single-family or multifamily homes.
- Physical form could create a detriment to the pedestrian and streetscape as the ADUs are less likely to have porches and entrances that face the street and might increase the height and bulk of the townhouses to fit two units.
- ADUs might be used as short-term rentals (i.e., rented through online platforms like Airbnb or VRBO). If ADUs were used as short-term rentals, this could negate one of the potential benefits of ADUs in townhouses as they wouldn't add to the supply of long-term rental or ownership housing.

## VI. Conclusion

The analyses performed for this report yield a picture of racial equity impacts of the code change. Although the allowance for ADUs is unlikely to significantly increase the likelihood of townhouse

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<sup>39</sup> Ibid, p. 28

<sup>40</sup> Ibid. p. 33-49



development that otherwise would not have occurred, this report finds that there is a risk of disparate impact on the basis of race within certain neighborhoods in unincorporated King County.

Based on work performed by ECONorthwest, in consultation with King County, this report finds that both North Highline and Skyway are considered to be at higher risk of displacement if development occurs as a result of the code change. Development is also slightly more likely to occur in these two areas as a result of the code change than in the other areas examined. Data shows that North Highline and Skyway have relatively high Black, American Indian, Alaska Native, and Latinx populations vulnerable to displacement. The Fairwood Subarea, Fall City Rural Town, Redmond Ridge Subarea, and Vashon Rural Town are assessed to have low displacement risk and/or low development likelihood of ADUs in townhouses and therefore, a much lower risk of disparate impact due to race.

The code also has potential positive and negative impacts for any area of King County, apart from the racial equity analysis results. For example, building an ADU in a townhouse could result in rental income or increased property value for the homeowner; however, use of ADUs as short-term rentals would not add to the supply of long-term rental or ownership housing.

Understanding the equity implications of the County's code changes informs the legislative process so that it can be made more equitable. Examining the legislative process through an equity lens also supports the ESJ Strategic Plan value of being racially just. Through this work, King County can support a pro-equity policy agenda.

## VII. Appendices

- A. "King County Townhouse ADU Regulations: Analysis of Racial Equity Impacts" Consultant Report
- B. Comment letter from Housing Development Consortium RE: HDC Opposes the Proposed Language on Townhouses and Accessory Dwelling Units Provisions Included in the Striking Amendment S4 to Proposed Ordinance 2019-0413

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# King County Townhouse ADU Regulations Analysis of Racial Equity Impacts

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December 22, 2021

Prepared for: King County

**DRAFT Report**

**ECONorthwest**  
ECONOMICS • FINANCE • PLANNING

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# Table of Contents

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|  |    |
|--|----|
| 1. BACKGROUND AND PURPOSE.....             | 1  |
| 2. EQUITY FRAMEWORK AND ANALYSIS.....      | 4  |
| 3. RESULTS AND FINDINGS BY FOCUS AREA..... | 19 |
| 4. TECHNICAL APPENDIX.....                 | 50 |

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# Summary

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## Background and purpose

As part of the 2020 update to the 2016 King County Comprehensive Plan, the King County Council approved multiple regulatory updates, collectively referred to as Ordinance 19146. Within this ordinance was a collection of regulations that allowed accessory dwelling units to be built as an accessory use to townhouse residential units. Following the approval of the ordinance, King County Council directed staff, via a proviso, to study the racial equity impacts of the changes to accessory dwelling unit regulations.

This report addresses the requirement for a racial equity analysis of the changes to accessory dwelling unit regulations for townhouses adopted by the 2020 King County Comprehensive Plan update using tools from the Office of Equity and Social Justice.

## Approach

The findings in this report were informed by an analysis that was structured to evaluate the relationship between vulnerability to displacement, development likelihood, and displacement risk based on the code changes adopted in Ordinance 19146.

- **Vulnerability to displacement:** Areas of King County where there are communities that are more vulnerable to economic and physical displacement, specifically communities of color as race is a critical component of vulnerability to displacement.
- **Development likelihood:** Areas of King County where townhouses, specifically townhouses with ADUs, are more financially feasible based on current market conditions.
- **Displacement risk:** The level of displacement risk, given the level of vulnerability to displacement of the community and where townhouses with ADUs are more feasible and have an increased likelihood of creating development pressure that can lead to physical displacement.

This analysis was conducted across all unincorporated areas of King County with a specific drilled down analysis on six focus areas: the rural town center on Vashon-Maury Island, the North Highline subarea, the Skyway-West Hill subarea, the Redmond Ridge subarea, the rural town of Fall City, and the Fairwood subarea. For these six focus areas, the consultant did deeper analysis to evaluate parcel-level data that focused on the locations and characteristics of the housing in the study areas to understand how many existing renter-occupied units might be at risk of redevelopment.

## Key Findings

The proviso directed this analysis to identify the impact from very specific and narrow regulatory changes that allow for ADUs in townhouses. Overall, this analysis found that across King County, the recent code changes to allow ADUs within townhouses only marginally increase development feasibility above baseline allowances for townhouses in the zones evaluated. While the likelihood of development feasibility for townhouses varies significantly across the County depending on local market conditions, the allowances for ADUs is not likely to significantly increase the likelihood of development of townhouses that otherwise would not have occurred without the new ADU allowances. This analysis also found that the marginal increases in development value from the ADU allowances were realized across all focus areas and not disproportionately realized in areas with greater vulnerability to displacement, including areas with higher share of communities of color.

However, this analysis did find that some of the focus areas evaluated are more likely to see potential displacement pressures than others. These displacement pressures are not the direct result of increases in development allowances from the ADU code changes, but rather are likely the result of cumulative disparate impacts from historic land use policy and land use decisions. These regulatory changes could result in marginal increases in townhouse feasibility in areas that are already experiencing development likelihood and greater vulnerability from a legacy of land use policies that were made without considering racial equity impacts. Some focus areas that are more vulnerable to displacement also have a higher share of zoning that allows for more dense residential development, including townhouses.

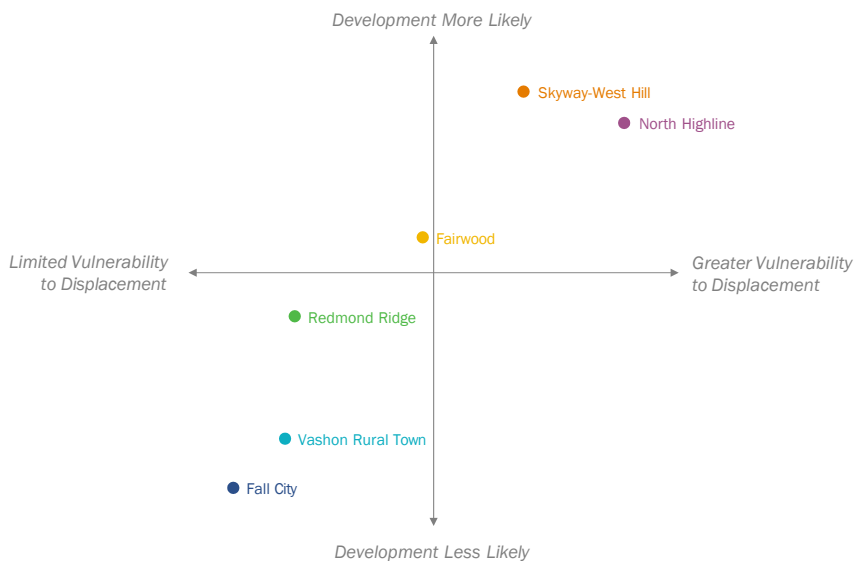
- **North Highline has the greatest vulnerability risk of the focus areas and relatively high development likelihood.** It has seen substantial market interest for townhouses in recent years, and there could be a marginal increase in the ability for townhouses with ADUs to pay for land due to the regulation changes (however, townhouses were already feasible in much of the North Highline area). Not only are these townhouses with ADUs marginally more feasible, but they are also likely to be more feasible in more locations due to the existing land use pattern in North Highline compared to other focus areas.
- **Skyway-West Hill has slightly greater development likelihood than North Highline and slightly lower vulnerability risk.** It has also seen substantial market interest for townhouses in recent years, and there could be a marginal increase in the ability for townhouses with ADUs to pay for land due to the regulation changes. Like in North Highline, these housing types are likely to be more feasible in more locations due to the existing land use pattern in Skyway-West Hill. While there are more parcels that could result in development in Skyway-West Hill, as compared to North Highline, the analysis indicates lower vulnerability to displacement.
- **Fairwood has some development likelihood and some vulnerability to displacement.** It has seen substantial market interest for townhouses in recent years, but the feasibility results indicate there could be a lower marginal increase in the ability for townhouses with ADUs to pay for land as compared to North Highline and Skyway-West Hill. The marginal increase is also only in the higher density zones like R-24 and R-48, the latter of which is



not currently mapped to many parcels in Fairwood. This focus area has fewer parcels that allow for townhouses, and substantially fewer households that are vulnerable to displacement as compared to other study areas.

- **Redmond Ridge has lower relative development likelihood and lower vulnerability to displacement.** While Redmond Ridge has seen substantial market interest for townhouses in recent years, there could be a marginal increase in development feasibility from these regulations is only in the highest density zone of R-48, which is not currently mapped to any parcels in Redmond Ridge. This focus area has fewer parcels that allow for townhouses, and substantially fewer households that are vulnerable to displacement, as compared to other study areas.
- **Vashon Rural Town has limited development likelihood and low vulnerability to displacement.** There has been limited market interest for townhouses in recent years and there could be a very limited increase in feasibility from these regulation changes as townhouses were already somewhat feasible in the Vashon Rural Town. However, these changes could have an impact on development likelihood if higher density zones were applied in the Vashon Rural Town. This focus area has very few parcels that allow for townhouses, and fewer households that are vulnerable to displacement as compared to other study areas.
- **Fall City has the lowest development likelihood and the lowest vulnerability to displacement.** There has been limited market interest for townhouses in recent years and there could be a very limited increase in feasibility from these regulation changes, as townhouses were already somewhat feasible in Fall City. There is only one zone in Fall City that allows for townhouses, and it only allows townhouses as part of a mixed use development. Therefore, Fall City as a focus area has fewer parcels that allow for townhouses.

**Figure 1: Equity Impact Results**



Source: ECONorthwest

## Background and Purpose

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As part of the 2020 update to the 2016 King County Comprehensive Plan, the King County Council approved multiple regulatory updates, collectively referred to as Ordinance 19146. Within this ordinance was a collection of regulations that effectively allowed accessory dwelling units to be built as an accessory use to townhouse residential units. Following the approval of the ordinance, King County Council directed staff, via a budget proviso, to study the racial equity impacts of the changes to accessory dwelling unit regulations. More specifically, the proviso language reads:

“P2 PROVIDED FURTHER THAT: Of this appropriation, \$75,000 shall not be expended or encumbered until the executive transmits a townhouse accessory dwelling unit analysis report and a motion that should acknowledge receipt of the report and a motion acknowledging receipt of the report is passed by the council. The motion should reference the subject matter, the proviso's ordinance number, ordinance section and proviso number in both the title and body of the motion. The report shall include racial equity analysis of the changes to accessory dwelling unit regulations for townhomes adopted by the 2020 King County Comprehensive Plan update using tools from the office of equity and social justice. The executive should electronically file the report and motion required by this proviso no later than June 30, 2022, with the clerk of the council, who shall retain an electronic copy and provide an electronic copy to all councilmembers, the council chief of staff and the lead staff for the mobility and environment committee, or its successor.”

King County contracted with ECONorthwest to conduct the directed racial equity analysis of the regulatory changes approved by council. This report documents the methods, assumptions, and results of the analysis and is a retrospective look at the impacts of the approved regulatory changes.

## Regulatory Changes

Among the many changes adopted by Ordinance 19146, the County revised multiple regulations that apply to the allowance of an accessory dwelling unit (ADU) as an accessory use to townhouse residential units. Generally, these changes fall into a couple main categories of regulations: **total area of the ADU, minimum lot size requirements, height limits, parking minimums, and occupancy requirements**. The following approved language, some newly approved and some existing, is the most relevant for this analysis and can be found starting on line 1613 of Ordinance 19146 (Section 43.7a).

- 1) Only one accessory dwelling per primary single detached dwelling or townhouse unit;
- 2) Only allowed in the same building as the primary dwelling unit, except that detached accessory dwelling units are allowed when there is no more than one primary dwelling unit on the lot, and the following conditions are met:
  - a. the lot must be three thousand two hundred square feet or greater if located in the urban area or a rural town; or

- b. the lot must meet the minimum lot area for the applicable zone if located in the rural area but not in a rural town, except that if one transferable development right is purchased from the Rural Area or Natural Resource Lands under K.C.C. chapter 21A.37, a detached accessory dwelling unit is allowed on a RA-5 zoned lot that is two and one-half acres or greater;
- 3) The accessory dwelling unit shall not exceed one thousand square feet of heated floor area and one thousand square feet of unheated floor area except:
  - a. when the accessory dwelling unit is wholly contained within a basement or attic, this limitation does not apply;
  - b. for detached accessory dwelling units, the floor area contained in a basement does not count toward the floor area maximum; or
  - c. on a site zoned RA if one transferable development right is purchased from the Rural Area or Natural Resource Lands under K.C.C. chapter 21A.37, the accessory dwelling unit is permitted a maximum heated floor area of one thousand five hundred square feet and one thousand five-hundred square feet of unheated floor area;
- 4) Accessory dwelling units that are not wholly contained within an existing dwelling unit shall not exceed the base height established in 21A.12.030;
- 5) When the primary and accessory dwelling units are located in the same building, or in multiple buildings connected by a breezeway or other structure, only one entrance may front a street;
- 6) No additional off-street parking spaces are required for accessory dwelling units;
- 7) The primary dwelling unit or the accessory dwelling unit shall be occupied either by the owner of the primary dwelling unit or by an immediate family member of the owner. Immediate family members are limited to spouses, siblings, parents, grandparents, children and grandchildren, either by blood, adoption or marriage, of the owner. The accessory dwelling unit shall be converted to another permitted use or shall be removed if neither dwelling unit is occupied by the owner or an immediate family member;

## Stakeholder Engagement

As part of the project scope, King County staff and members the consultant team met with various stakeholders to help inform the project approach and considerations for analysis. More specifically, we reached out to seven organizations and were able to engage five of those we contacted through stakeholder interviews.

These stakeholders included advocacy organizations, developers of townhouse-type housing, and affordable housing providers. We met with A Regional Coalition for Housing (ARCH), White Center Community Development Association (WCCDA), Master Builders Association of King and Snohomish Counties (MBAKS), Housing Development Consortium (HDC), and Green Canopy Development. A few key themes and considerations arose from these interviews that helped inform our analysis.

## Concerns and implications from unlimited basement allowances

Some of the stakeholders raised a concern regarding the square footage limit for ADUs not including the area that is contained below grade or within a basement. The implication is that it could potentially double the size of the ADU (if the ADU had a basement) thereby increasing the development likelihood which could increase displacement risk. Other stakeholders saw this area exemption as a way to build in flexibility to the square footage limitation, specifically for ADUs that are detached and separate from the primary unit – this could help navigate specific constraints on parcel-by-parcel basis, such as sites with slopes or oddly configured parcels. However, they noted this would rarely be used given the cost to excavate soils.

## Concern about additional housing being used as short-term rentals

Various stakeholders expressed concern with the potential outcomes of new ADUs, either as an internal conversion or new construction, being used as short-term rentals. This concern is especially acute for communities close to the airport as well as those near recreational and tourist destinations. This feedback highlights the issue that if the ADUs are allowed as short-term rentals then they could increase the displacement risk without simultaneously increasing the supply of long-term rental housing.

## Interest and uncertainty around individual sale of ADUs

Some stakeholders are interested in the potential to create a condominium association to separately sell each townhouse and ADU unit. This could create more affordable ownership opportunities in places with limited supply and places where the demand for ownership units is high. If the ADUs can't be sold separately, the area within the ADU would be included in the sale of the primary townhouse unit and would require a higher purchase price that many potential homeowners might not be able to afford. If both units on a site (the primary townhouse and the accessory unit) were able to be sold and owned separately more moderate-income households might more easily access these housing types. However, there is uncertainty given existing owner occupancy requirements that restrict this potential.

## Concern regarding owner occupancy requirements

Some stakeholders noted that existing owner occupancy requirements limit the interest from the market as buyers sometimes need to relocate for jobs or other personal reasons. If this requirement is attached to the sale of the unit, this could deter future owners who might anticipate a relocation in their future and are concerned about having to continue paying the mortgage while also paying for housing in another location. This lack of flexibility likely reduces the potential pool of buyers and market demand, which in turn limits the likelihood that these units will be developed.

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**How buyers will qualify for townhouses with ADUs.** We confirmed via our stakeholder engagement that if a new construction townhouse includes an ADU, a mortgage lender will not allow a prospective buyer to count the future revenue from the ADU as additional income to help them qualify for a mortgage - an ADU typically needs two years of demonstrated rental income for a lender to include it in their underwriting. This means that only higher-income households will likely qualify for a mortgage to purchase a townhouse with an ADU.

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## Interest and concern about the form and urban design of the units

Stakeholders expressed both interest and concern about the form and urban design impacts of these units. Some stakeholders saw a benefit in allowing denser housing in smaller scale buildings, as compared to higher density market rate multifamily buildings that are not perceived as accessible to lower-income households. Additionally, smaller scale housing is likely to be more compatible with the existing development pattern in most of King County. However, there was also concern from other stakeholders that the physical form could negatively impact the pedestrian and neighborhood character as the ADUs are less likely to have porches and entrances that face the street. They could also contribute to builders more likely using the full building envelope that is allowed which might otherwise be smaller if they only contained the one primary unit.

## Estimate that utilization of these allowances will be limited

Given the parameters of the code, and the market dynamics in unincorporated King County, a couple of stakeholders estimated that the use of these regulatory changes will be limited to very specific cases based on site suitability. They expressed support for these changes, however, as they allow for greater flexibility and could serve to meet market demand for housing at different scales and price points.

# Equity Framework and Analysis

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## Introduction to the Analytic Framework

To understand the racial equity impacts of the townhouse and ADU code changes, this analysis evaluated two key spatial indicators to identify potential disparate impacts:

- 1) Areas in King County where there are communities of color that could be vulnerable to displacement
- 2) Areas where townhouses, specifically those with ADUs, are most likely to occur.

This analysis used this two-track approach – the equity and displacement analysis and the townhouse feasibility analysis - to arrive at an understanding of displacement risk and any racial equity impacts from the changes to the regulations. The combination of these two tracks was guided by the following key concepts:

- **Vulnerability to displacement:** Areas where there are communities that are more vulnerable to economic and physical displacement, specifically communities of color as race is a critical component of vulnerability to displacement.
- **Development likelihood:** Areas where townhouses, specifically townhouses with ADUs, are more financially feasible based on current market conditions.

- **Displacement risk:** The level of displacement risk, given the level of vulnerability to displacement of the community and where townhouses with ADUs are more feasible and have an increased likelihood of creating development pressure that can lead to physical displacement.

Given the geographic extent of King County, ECONorthwest worked with staff to identify focus areas for the analysis that serve as a sample of the various combinations of community and market dynamics present in the county. For this analysis, we evaluated the following six focus areas (see

Figure 2): the rural town center on Vashon-Maury Island, the North Highline subarea, the Skyway-West Hill subarea, the Redmond Ridge subarea, the rural town of Fall City, and the Fairwood subarea.

**Figure 2: Map of Focus Areas**



Source: ECONorthwest

## Equity Analysis Framework and Methodology

The first track of our analysis is structured to provide a clear understanding of demographic conditions across King County with an emphasis on understanding vulnerability to

displacement, specifically for communities of color. This analysis utilized existing methodologies used by both King County’s Office of Equity and Social Justice (OESJ) and the University of California at Berkeley’s Urban Displacement Project (UDP).

The King County OESJ has created both an Equity Impact Review Process and produced other work that analyzed equity impacts of policies and programs in King County. As a starting point for our analysis, we first replicated OESJ’s Equity Impact Awareness Tool that was developed to help understand the impacts of COVID-19 and an associated King County program for locating and placing isolation/quarantine sites. This tool was based on the Center for Disease Control’s Social Vulnerability Index. It evaluated multiple demographic data, identified indicators relevant to economic resiliency, and produced a composite score for identifying risk of prolonged economic impact from COVID-19. While this project is not related to health equity, the variables that make certain communities vulnerable to the economic impact from COVID-19 are similar to vulnerability from other forms of economic hardships, such as displacement.

OESJ identified seven indicators based on demographic data related to race, asset poverty, income, home ownership, and age (see Figure 3). To arrive at a composite score, “the higher (>25%) threshold in the race indicator, the higher (>30%) income indicator and the asset poverty indicator are each scored as 2 points. The lower (>10%) Race indicator, the lower (>20%) income and the age indicator were each scored as 1 point.”<sup>1</sup> For this report, we recreated the analysis at the census tract level given the increasing margins of errors for smaller geographies (e.g., census blocks, census block groups). We evaluated any census tract that intersected with the boundaries of the relevant focus area. This serves as one approach for understanding vulnerability to displacement and equity impacts.

A second approach utilized in this report was to incorporate the methodology developed by the University of California at Berkeley’s Urban Displacement Project (U<sup>Source: King County OESJ</sup> UDP has partnered with “universities, government agencies, philanthropy, and local organizations, in an effort to understand unique dynamics of displacement and potential

**Figure 3: King County Equity Impact Awareness Tool**



<sup>1</sup> King County Office of Equity and Social Justice. <https://kingcounty.gov/~media/elected/executive/equity-social-justice/2020/COVID-19/OESJ-EIA-942020.ashx?la=en>

negative impacts of gentrification on communities across the United States. These efforts have culminated in the creation of interactive typology maps, which summarize housing market dynamics and displacement and gentrification risk into eight distinct categories”<sup>2</sup> (see Figure 6). UDP has made their analysis code open source which allowed us to access their data and methods used for characterizing King County.

Although the UDP methodology does not currently incorporate race, it does incorporate income levels, the change in income over time, and housing market prices. These differences created a nice complement to the OESJ approach. Additionally, the UDP approach not only characterized areas that were “susceptible to displacement” or “experiencing gentrification,” but also areas that were “mixed income” and “exclusive” (see Figure 6 for typology definition). The equity impacts and any associated policy implementation recommendations will likely be different for each focus area and relative to this range of typologies.

Using the UDP methodology along with the OESJ Impact Awareness Tool allows us to understand both areas of King County that might see disparate impacts from policy decisions on communities of color as well as areas of exclusion that could see positive benefits from allowing more diverse housing types.

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<sup>2</sup> University of California, Berkeley’s Urban Displacement Project. <https://github.com/urban-displacement/displacement-typologies>



## How did this work incorporate the King County Equity Impact Review Toolkit?

Jurisdictions that plan with equity in mind must ensure that proposed policies and regulations will serve and benefit all residents of a community in ways that reduce or eliminate inequity. We used a customized approach for analyzing equity and recommendations to promote equity that integrates a framework inspired by King County’s Equity Impact Review Process focused on planning, decision-making and implementation of actions (see Figure 4) and another method focused on planning (see Figure 5) that asks a series of questions to explore evidence associated with the problem, context, and solutions (Cohen, S., Morrison, S., Price, 2020).<sup>3</sup> These methods guided the team on what issues to look for in the data analysis and helped the team deeply explore any relevant data problems.

**Figure 4: King County’s Equity Impact Review Process**

Source: King County Office of Equity and Social Justice



*Evaluation focuses on:*

**Distributional Equity:** Fair and just distribution of benefits and burdens to all affected parties and communities across the community.

**Process Equity:** Inclusive, open, and fair access for all stakeholders to decision processes that impact community and operational outcomes.

**Cross-Generational Equity:** Promotes policies that create fair and just long-term distribution of benefits and burdens including equitable income, wealth, and health outcomes.

The proviso directed the work to use “tools from the office of equity and social justice.” We referenced this toolkit and the checklist associated with “Phase 1: Scope. Identify who will be affected.” Key to the scope for the consultant work was the first bullet in the checklist: “Identify how your action will affect / serve people and places using demographic information. Consider in particular low income populations, communities of color, and limited-English speaking residents.”

**Figure 5: Evidence for Planning**

Source: Cohen, S., Morrison, S., Price, K. (2020). Center for the Study of Social Policy



*Evidence of Problem Questions:*

- What are people experiencing?
- How widespread is the experience and how acute is it?
- What inequities exist across population groups?
- What are the causes of the problem, including systemic and institutional factors?

**Figure 6: Urban Displacement Project's Typologies**

| Modified Types                                | Criteria  |
|---|---|
| Low-Income / Susceptible to Displacement      | <ul style="list-style-type: none"> <li>• Low or mixed low-income tract in 2018</li> </ul>   |
| Ongoing Displacement of Low-Income Households | <ul style="list-style-type: none"> <li>• Low or mixed low-income tract in 2019</li> <li>• Absolute loss of low-income households, 2000-2018</li> </ul>  |
| At Risk of Gentrification                     | <ul style="list-style-type: none"> <li>• Low-income or mixed low-income tract in 2018</li> <li>• Housing Affordable to low or mixed low-income households in 2018</li> <li>• Didn't gentrify 1990-2000 or 2000-2018</li> <li>• Marginal change in housing costs OR Zillow home or rental value increases in the 90<sup>th</sup> percentile between 2012-2018</li> <li>• Local and nearby increases in rent were greater than the regional median between 2012-2018 OR the 2018 rent gap is greater than the regional median rent gap</li> </ul> |
| Early / Ongoing Gentrification                | <ul style="list-style-type: none"> <li>• Low-income or mixed low-income tract in 2018</li> <li>• Housing affordable to moderate or mixed moderate-income households in 2018</li> <li>• Increase or rapid increase in housing costs OR above regional median change in Zillow home or rental values between 2012-2018</li> <li>• Gentrified in 2990-2000 or 2000-2018</li> </ul>   |
| Advanced Gentrification                       | <ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018</li> <li>• Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018</li> <li>• Marginal change, increase, or rapid increase in housing costs</li> <li>• Gentrified in 1990-2000 or 2000-2018</li> </ul>   |
| Stable Moderate / Mixed Income                | <ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018</li> </ul>  |
| At Risk of Becoming Exclusive                 | <ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018</li> <li>• Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018</li> <li>• Marginal change or increase in housing costs</li> </ul>  |
| Becoming Exclusive                            | <ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018</li> <li>• Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018</li> <li>• Rapid increase in housing costs</li> <li>• Absolute loss of low-income households, 2000-2018</li> <li>• Declining low-income in-migration rate, 2012-2018</li> <li>• Median income higher in 2018 than in 2000</li> </ul>  |
| Stable / Advanced Exclusive                   | <ul style="list-style-type: none"> <li>• High-income tract in 2000 and 2018</li> <li>• Affordable to high or mixed high-income households in 2018</li> <li>• Marginal change, increase, or rapid increase in housing costs</li> </ul>   |

Source: Urban Displacement Project

<sup>3</sup> King County Equity and Social Justice Strategic Plan, 2016-2022: <https://kingcounty.gov/elected/executive/equity-social-justice/strategic-plan.aspx> and Cohen, S., Morrison, S., Price, K. (2020). Center for the Study of Social Policy.

## Home Ownership and Relationship to Vulnerability to Displacement

Based on our conversations with stakeholders and staff, the consultant team did deeper analysis into one of the indicators identified in the OESJ methodology: the percent of households that own their home (or, inversely, the percent of households that are renters). Displacement concerns typically center around renters instead of homeowners for several reasons. In Washington, homeowners are largely insulated from the financial effects of market changes due to the property taxation system, which limits the annual increase in assessed values, meaning that rising home values only impact property tax amounts in very limited circumstances. In addition, renters tend to have lower incomes than homeowners and rental leases provide renters with less housing stability and cost predictability compared to typical mortgages. Generally, renters only have the right to remain in a given location for the duration of their lease, and shorter leases can be relatively easily broken. Renters are also not in control of decision-making about the property; the property owner is the one who decides whether to upgrade the property, redevelop it, or make other changes that would affect the rent and the tenants.

North Highline has a small percentage of households owning the home they live in (per Census data) as compared to other focus areas. However, part of this is due to a larger share of rental units in regulated affordable housing in North Highline. A closer look at the data is warranted to better characterize vulnerability to displacement. However, detailed data about households is very limited, and prone to larger margins of error, at smaller geographies than the Census Tract level.

To solve for this limitation, we created a framework (see Figure 7) to evaluate parcel-level data (data about housing units are available at the level of individual properties) that focuses on the locations and characteristics of the housing in the study area as a proxy for vulnerable renter households. More specifically, this framework identifies attributes such as the tenure of the units, the age of the building (something recently built is less likely to get demolished for redevelopment), and the value of the property relative to similar properties (higher valued properties are less likely to get demolished for redevelopment).

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**Physical Displacement:** In the context of this analysis, physical displacement can occur due to redevelopment of older, less expensive (but not income/rent-restricted) housing where existing tenants must move out. Even if the redevelopment results in the same or more units as were on the previous site, existing residents may not be able to afford the higher rents in the new development.

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**Figure 7: Classifying vulnerability to displacement of existing housing units on tax lots**

| Tenure         | Housing Type                 | Size     | Value                        | Parcel Adjacency                | Potential Physical Displacement  |  |
|----------------|------------------------------|----------|------------------------------|---------------------------------|--|--|
| Owner-Occupied | Condominium                  | Any      | Any                          | Any                             | Very Low Risk  |  |
|                | Single Family                | Any      | Any                          | Any                             | Very Low Risk  |  |
| Rental         | New Construction             | Any      | Any                          | Any                             | Very Low Risk: Unlikely to be redeveloped  |  |
|                | Regulated Affordable Housing | Any      | Any                          | Any                             | Very Low Risk: Unless restrictions expire or ownership changes   |  |
|                | Older Unregulated Housing    | >4 Units | Any                          | Any                             | Any  | Low Risk: Little precedent for larger, privately-owned buildings to be redeveloped |
|                |                              |          | Higher Value per square foot | Any                             | Any  | Medium Risk: Higher value makes redevelopment less likely                          |
|                |                              | <4 units | Low value per square foot    | Not adjacent to similar parcels | High Risk: Lower value makes redevelopment more likely   |  |
|                |                              |          |                              | Adjacent to similar parcels     | Very High Risk: Adjacency to other, older unregulated, rental housing, of low value, increases potential for parcel assemblage which makes redevelopment more likely |  |

Source: ECONorthwest

Given the scope of the proviso and this analysis, we chose to focus more closely on the Low Risk, Medium Risk, High Risk, and Very High Risk categories. In reality, some of the Very Low Risk types of housing units could indeed still be vulnerable to displacement – specifically the Regulated Affordable Housing, especially if affordability restrictions expire. However, in our experience, larger, multifamily developments are less likely to get replaced by lower-density developments such as townhouses and would instead more likely be replaced by higher-density developments.

Using the framework in Figure 7, we collected residential tax lot data from the King County Assessor website and evaluated various attributes of the data to categorize the Low Risk, Medium Risk, High Risk, and Very High Risk parcels across all six focus areas. The following steps were taken to evaluate tax lots using this framework.

1. Identify where parcels were likely rented versus owned. To do this, we used the site address and compared that to the owner address – differences in the address could indicate the property was rented. However, this required a modest amount of data cleaning to guarantee data entry differences (such as “street” versus “st” in the address field) were not deemed an actual site address difference.

2. Filter the parcel data to eliminate newer construction by only evaluating parcels with a year-built date that was older than 2000. We then
3. Filter the data for parcels that had fewer than 4 units and find the median value of those parcels, by focus area, to use as a threshold to divide the parcels into the two value categories – those that had a higher value we determined to be Medium Risk versus those with a low value we deemed to be at least High Risk if not Very High Risk.
4. Spatially evaluate the parcels to find any parcels that we determined to be at least High Risk to see if they shared a parcel boundary with another presumed rental parcel, or if two or more parcels with a common owner were adjacent. We determined these parcels to be Very High Risk.
5. The remaining tax lots were categorized as Low Risk.

## Townhouse ADU Feasibility Analysis Framework and Methodology

Central to the analysis for this report is the assumption that the changes to the regulations will create more opportunity for ADUs to be built within townhouses or on townhouse lots. This second component seeks to confirm that assumption is true, and if so, to understand the instances when creating ADUs in townhouses leads to benefits and when it leads to negative impacts.

### How might allowing ADUs in townhouses create benefits, especially for people vulnerable to displacement?

There are multiple potential benefits of allowing ADUs in townhouses for both homeowners and the larger community. Through conversations with stakeholders and staff, and based on prior work, we have identified the below list of potential benefits:

For households that own an existing townhouse

- **Adds a source of additional income** if they build and rent out an ADU. This could increase the ability for a household to stay in their home in a gentrifying neighborhood by creating an additional source of household income.
- **Increases the value of the home** if a homeowner were to sell their townhouse.
- **Creates flexibility for a growing, or multigenerational family** by allowing for additional and separate living spaces.

For other households in the community

- **Could increase the amount of rental housing** in areas with limited supply, should townhouse owners choose to rent out these units. This could be especially beneficial in places that are some level of “exclusive” (per the UDP typologies) and that have little rental housing stock. Additionally, ADUs can cost less to construct on a per unit basis than denser multifamily housing. This could create an opportunity to leverage these units to be rented at below market prices given they do not need as much revenue to cover the costs of construction.

- **Could create an opportunity to leverage other potential public or non-profit programs for providing affordable and middle-income housing** such as providing units for residents who are housing insecure. Affordable housing providers and community organizations are increasingly looking at additional opportunities to support community stability through housing. ADUs can be helpful for these organizations who might undertake new development of larger townhouse units to serve larger household sizes while also providing more units and more types of units than they could provide through only townhouses. Some organizations also maintain a dispersed site portfolio that could include townhouses that could be retrofitted to create additional units on existing sites.

### Are there any conditions that might limit the ability of a household to realize the benefits of being allowed to build an ADU (and therefore contribute other benefits to the community)?

Although there are many potential benefits of allowing ADUs in townhouses, there are some conditions that could limit those benefits, specifically when it comes to existing individual households desiring to add an ADU in their townhouse.

#### Other “regulatory” barriers

For individual homeowners that aren’t accustomed to navigating the permit process, it can be daunting, costly, and a perceived barrier to pursuing adding an ADU. Additionally, many townhouses are not individually owned and are instead part of a condominium. These condominium structures of ownership have homeowners’ associations (HOAs) typically with covenants, conditions, and restrictions (CC&Rs) that layer another set of regulations on what homeowners are allowed to do with their property. These CC&Rs might restrict the physical form of an addition or retrofit that would allow for an ADU without additional changes to the CC&Rs that require support from the HOA board.

#### Physical barriers for existing townhouse construction

Adding an ADU can be difficult, despite any regulatory barriers, given the size and potential footprint of the unit. This is especially true for adding ADUs to an existing townhouse as they are often smaller than single-family homes, which leaves little space for conversion unless they can convert a garage, attic, or basement. Most existing townhouses don’t have a larger enough lot to physically add a detached ADU in the backyard. These physical constraints get more complicated given the need to maintain parking spaces for the townhouse per the zoning code standards, Although King County’s Regulations don’t mandate additional parking provisions for the ADUs themselves.

#### Financial barriers

The cost of building an ADU can be prohibitive for most homeowners – ADU construction, whether a retrofit or new construction, can easily be over \$100,000 per unit and more likely

closer to \$200,000 (depending on the market, site conditions, and local fees and regulations).<sup>4</sup> Most homeowners are unlikely to have the full cost in cash or savings and will need to access some type of loan to help finance the construction. Depending on the income of the homeowner and the value of the home there are different sources of money and loan products available (see Figure 8). For instance, if the home has appreciated substantially in value since when the owner bought it, they might be able to pursue a cash-out refinance or home equity line of credit, both of which have limited, or no cost associated with using those funds. Whereas a renovation loan (e.g., an FHA 203(k) or bank financed renovation loan), which is more likely the source of money available for an owner with limited equity in their home, will have an interest rate associated, increasing the cost of borrowing and using the money. Most importantly, for low-income households depending on their credit score and other characteristics, banks might associate a greater risk and therefore increase the interest rate for any loan product, therefore increasing the overall cost of building an ADU.

**Figure 8: Households by Income and Equity in Comparing Existing Mortgage and Loan Products**

|                  | High-Income                                  | Low-Income                              |
|------------------|--|---|
| High Home Equity | Cash-Out Refinance or Home Equity Loan/HELOC | Special FHA or Fannie Mae Loan Products |
| Low Home Equity  | Renovation Loan                              | Cash Savings and Personal Resources     |

Source: Adapted from UC Berkeley Center for Community Innovation, 2017



It is also possible that banks could qualify a homeowner for a loan, to fund the cost of building an ADU, without providing the owner with information on the likelihood of being able to rent out the unit at a price point great enough to cover the loan payment. In this case, building an ADU could put a homeowner in greater debt rather than create a source of additional income, thereby increasing the displacement risk.

### What is the likelihood that townhouses with ADUs could increase redevelopment pressure? Would these outcomes negatively impact communities vulnerable to displacement?

To understand where there might be development that leads to displacement, we had to consider which zones allowed for townhouses, the form of townhouses and ADUs those zones would allow, and how the form of those units might result in the units being bought or rented.

<sup>4</sup> Accessorydwellings.org; ADU Development Costs Keep Going Up; <https://accessorydwellings.org/2019/05/28/adu-development-costs-keep-going-up/>

We first conducted research on the King County zoning code and any relevant changes approved by council. In total, there are 15 base zones that allow for townhouses either as a permitted use or conditional use. However, many of the zones where townhouses were a permitted use had development conditions that will impact the form and likelihood of development.

**Figure 9: Zones that allow Townhouses**

|                                 | Conditional Use  | Permitted Use but with Development Conditions   |   | Permitted Use          |
|---------------------------------|--|---|---|------------------------|
| Zones                           | RA-2.5, RA-5, RA-10  | R-1, R-4, R-6, R-8  | NB, CB, RB, O   | R-12, R-18, R-24, R-48 |
| Relevant Development Conditions | 4. Only in a building listed on the National Register as an historic site or designated as a King County landmark subject to K.C.C. chapter 21A.32 | 11. Townhouses are permitted, but shall be subject to a conditional use permit if exceeding base density.<br>12. Conditional use permit is required before approving more than one dwelling on individual lots, except on lots in subdivisions, short subdivisions or binding site plans approved for multiple unit lots, and except as provided for accessory dwelling units in subsection B.7. of this section. | 3. Only as part of a mixed-use development subject to the conditions of K.C.C. chapter 21A.14, except that in the NB zone on properties with a land use designation of commercial outside of center (CO) in the urban areas, stand-alone townhouse developments are permitted | N/A                    |

Source: King County zoning code sections 21A.08.030 and 21A.12.030

Based both on our research of the zoning standards and on the stakeholder feedback which indicated interest in building townhouses as stand-alone developments, we chose to evaluate the feasibility of townhouses in the zones where the use was permitted outright without conditions. Therefore, the subset of zones we chose to analyze was R-12, R-18, R-24, and R-48. These zones have standards that are similar to other zones not modeled (e.g., height, dwelling units per acre, impervious coverage) such that they present a representative sample of zones and the results of the feasibility analysis in these zones will be applicable for interpreting feasibility in the zones not modeled. We have summarized the specific zoning code standards we considered in the analysis in Figure 10.

**Figure 10: Zoning Standards Considered in Analysis**

|  | R-12   | R-18     | R-24     | R-48     |
|--|--|----------|----------|----------|
| Base Density: Dwelling Units/Acre (DUA)* | 12 du/ac   | 18 du/ac | 24 du/ac | 48 du/ac |
| Base Height*                             | 60 ft  | 60 ft    | 60 ft    | 60 ft    |
| Impervious Coverage                      | 85%  | 85%      | 85%      | 90%      |
| Setbacks: street / interior              | 10 ft street setback, 5 ft interior setback (interior setback can be modified under the provisions for zero-lot-line and townhouse developments) |          |          |          |



|                                   |   |
|-----------------------------------|---|
| Parking minimum (spaces per unit) | 2 stalls per unit for townhouses. No parking minimum requirement for ADUs   |
| Open Space                        | Residential developments, other than cottage housing developments, of more than four units in the UR and R-4 through R-48 zones, stand-alone townhouse developments in the NB zone on property designated commercial outside of center in the urban area of more than four units, and mixed-use developments of more than four units, shall provide recreation space for leisure, play and sport activities as follows:<br>-For developments of 8 DUA or less: 390 sf per unit<br>-For developments greater than 8 DUA: 170 sf per unit<br>For developments of five dwelling units or more, a tot lot or children's play area, that includes age-appropriate play equipment and benches |
| Minimum lot size for Detached ADU | ADU is only allowed in the same building as the primary dwelling unit, except when the lot is three thousand two hundred square feet or greater if located in the urban area or a rural town  |
| Owner occupancy requirement       | The primary dwelling unit or the accessory dwelling unit shall be occupied either by the owner of the primary dwelling unit or by an immediate family member of the owner. The accessory dwelling unit shall be converted to another permitted use or shall be removed if neither dwelling unit is occupied by the owner or an immediate family member.   |

\*For the purposes of this analysis we assumed developments would be market-rate and not 100% affordable which means they would be subject to the base density and not entitled to the maximum density for the zone  
Source: King County zoning code section 21A.12.030 and County Council code amendments in Ordinance 19146

We used the above zoning standards (Figure 10) to inform the scale of townhouse development that was possible as a factor in our analysis of development likelihood. For this analysis we created a model that employs the same financial considerations a real estate developer would use to determine if a proposed development is financially feasible. These financial calculations are referred to as a *pro forma* model. A pro forma considers the size of the building allowed by zoning and the revenue that building can deliver (from rents and sales prices) relative to the costs of constructing and operating the building. We ran the pro forma model on example developments (or *prototypes*) that are reflective of the types and scales of development allowed in the R-12 through R-48 zones in King County.

Although the County Council code amendments in Ordinance 19146 allowed for unlimited basements for ADUs, based on our stakeholder engagement we did not consider this zoning standard for our prototypes. The unlimited basement allowance would likely only be used occasionally for detached ADUs given the cost to excavate soils and attached ADUs would likely be constrained by the footprint of the townhouse unit and not need additional area.

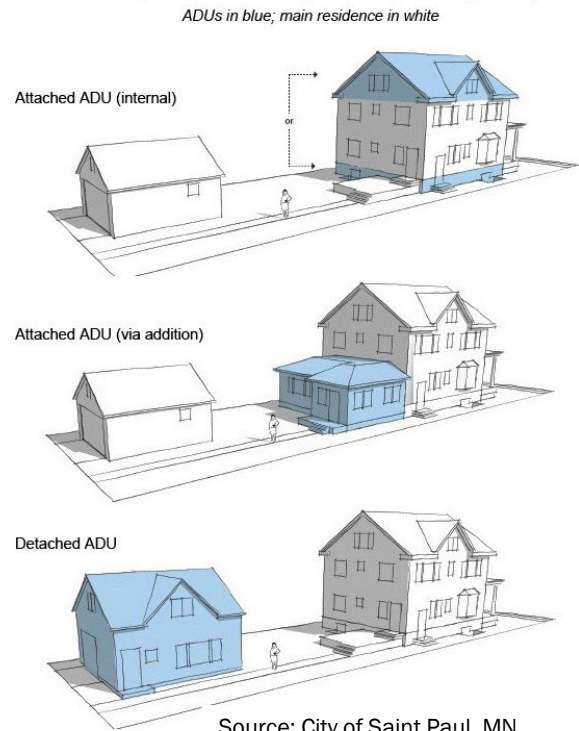
We considered both attached ADUs (AADU) and detached ADUs (DADU) when we determined the relevant prototypes. Although a DADU is a more preferred development form, according to the stakeholders we interviewed, this form of construction is unlikely in King County because most townhouse lots are unlikely to be financially feasible given the minimum lot size requirement for DADUs of three thousand two hundred square feet. Instead, an AADU is more likely to be the common form of an ADU built in new construction townhouses if they are financially feasible. We assumed the access to an AADU would begin on the ground floor of a three-story townhouse. Due to this form, we assumed a basement beneath the ground floor (which houses both the AADU and garage) was unlikely. This form constraint plus the zoning code constraint for DADUs leads us to conclude that the use of the unlimited basement allowances would be rare. It is unlikely that these allowances would increase the development likelihood and associated displacement risk. We also assumed the AADU would be a 1-bedroom unit, at approximately 650 square feet, to appeal to the market of unincorporated King County which has very few comparable units smaller than a 1-bedroom.

We modeled the financial feasibility of three townhouse with AADU prototypes to capture various market preferences for townhouse size and bedroom count:

- A smaller-sized, 2-bedroom townhouse that was approximately 1,200 square feet plus the 1-bedroom AADU;
- A medium-sized, 3-bedroom townhouse that was approximately 1,600 square feet plus the 1-bedroom AADU; and
- A larger-sized, 4-bedroom townhouse that was approximately 1,800 square feet plus the 1-bedroom AADU.

Using these prototypes, we used a common financial pro forma method called a *residual land value analysis* to analyze the impact of regulatory and incentive changes on development feasibility. Residual land value (RLV) is an estimate of what a developer would be able to pay for land given the property's income from rental or sales revenue, the cost to build as well as to operate the building, and the investment returns needed to attract capital for the project. In other words, it is the budget that developers have remaining for land after all the other development constraints have been analyzed. An advantage of the RLV approach is that it does not rely on land prices as an input. Rather, observed land prices can be compared with the model outputs to help calibrate the model and ensure it reflects reality. Because RLV is essentially a land budget, a higher RLV relative to existing land prices indicates better development feasibility.

**Figure 11: Examples of DADUs and AADUs**



To conduct this analysis, 2021 real estate data inputs were gathered from multiple sources including CoStar, Redfin, RS Means, the King County Assessor, and interviews with local developers and real estate experts. Data include building program assumptions (e.g., unit size, parking ratios, building heights), operating assumptions (e.g., sales prices, rents, operating costs), development cost assumptions (e.g., hard costs, soft costs), and valuation metrics (e.g., spread on cost thresholds). The RLV results were then compared to land values of improved tax lots, which was derived from the assessor data for land of tax lots zoned R-12 to R-48 in our focus areas.

We analyzed each of the prototypes using this RLV approach. The results from this method describe a general analysis of prototypes and do not consider the many potential unique conditions that could be a factor in development feasibility (e.g., increased predevelopment costs, low land basis from longtime land ownership). For these reasons, a residual land value analyses should be thought of as a strong indicator of the relative likelihood of development, rather than an absolute measure of return to the investor or developer.

In the results section of this report, we compare the development likelihood of townhouses to the vulnerability to displacement for each of the focus areas. In areas with higher vulnerability and higher development likelihood, these regulations could result in increased displacement risk.

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**Land budget**-This term is used throughout this report and is defined as the price (or price per square foot) of land that a site would need to be purchased at to make a development type feasibility. The land budget is what a developer can pay for land and still maintain a financially feasible development project.

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### Are there any other negative impacts of allowing ADUs in townhouses?

The primary negative impact we are assessing in this report is the resulting displacement risk from development likelihood in each of the focus areas. However, there are other potential negative impacts that could result from allowing ADUs in townhouses should they get built. Through conversations with stakeholders and staff, and based on prior work, we have identified the below list of additional negative impacts:

- **Lower revenue from impact fees** because ADUs are exempt from paying them. This could mean less revenue for schools as compared to if those same housing units were constructed as single-family or multifamily homes.
- **Physical form could create a detriment to the pedestrian and streetscape** as the ADUs are less likely to have porches and entrances that face the street and might increase the height and bulk of the townhouses in order to fit two units.
- **ADUs might be used as short-term rentals** given that King County does not regulate or restrict short term rentals such as those listed with Airbnb or VRBO. ADUs as short-term rentals could negate one of the potential benefits of ADUs in townhouses as they wouldn't add to the supply of long-term rental or ownership housing. We explored this issue for each focus area and compared long-term rental monthly rents for studio, 1-bedroom, and 2-bedroom units to the nightly rates of similarly sized Airbnb units. We found that, at the minimum, short-term rentals would need to be rented at least 10 nights a month to generate the same revenue of the unit rented as a long-term rental.

This comparison excludes any additional operating costs of having a short-term rental such as cleaning the unit after each stay. Therefore, this negative impact might not be likely in the short term, given current pricing, but should still be a consideration especially for areas with increased displacement risk.

### Considerations for ADU regulatory flexibility

From a financial perspective, most townhouse owners would not be incentivized to rent out the ADUs as short-term rentals given current market conditions. However, there are other motivations for homeowners that might make them more inclined to lease the space on a short-term basis, thereby reducing the supply of long-term housing. National research on why homeowners decide to build ADUs (or buy housing with ADUs) indicates that flexibility for a variety of uses over time is one of the biggest drivers of decision making.<sup>5</sup> Homeowners use ADUs as long-term rentals, habitable space for friends and family, short-term rentals, or as flexible extensions of the primary structure over different periods of time. Using ADUs as short-term rentals allows some flexibility for personal use of space within ADUs while also covering costs of construction or purchase that can allow these units to get built and transition to different uses over time.

If the ADU is not allowed to be sold separately as a condo, a new construction ADU within a home will be counted in the sales price of the home, thereby increasing the price of the home and making it only available to higher-income buyers. These buyers are less likely to need the revenue from renting the ADU, either as a short-term rental or long-term rental. Being able to sell the ADU unit as a separate condo, so long as there are short-term rental regulations in place, might make it more likely that the ADU unit adds a missing option to the existing housing supply at a price point lower than other new construction ownership options.

## Results and Findings by Focus Area

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### Key findings across King County

Overall, this analysis found that across King County, the recent code changes to allow ADUs within townhouses only marginally increase development feasibility above baseline allowances for townhouses in the zones evaluated. While the likelihood of development feasibility for townhouses varies significantly across the County depending on local market conditions, the allowances for ADUs is not likely to significantly increase the likelihood of development of townhouses that otherwise would not have occurred without the new ADU allowances. The recent code changes to allow ADUs only create only a marginal increase in development value beyond previous townhouse allowances. This analysis also found that the

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<sup>5</sup> <https://www.aarp.org/content/dam/aarp/livable-communities/livable-documents/documents-2019/ADU-guide-web-spreads-071619.pdf>

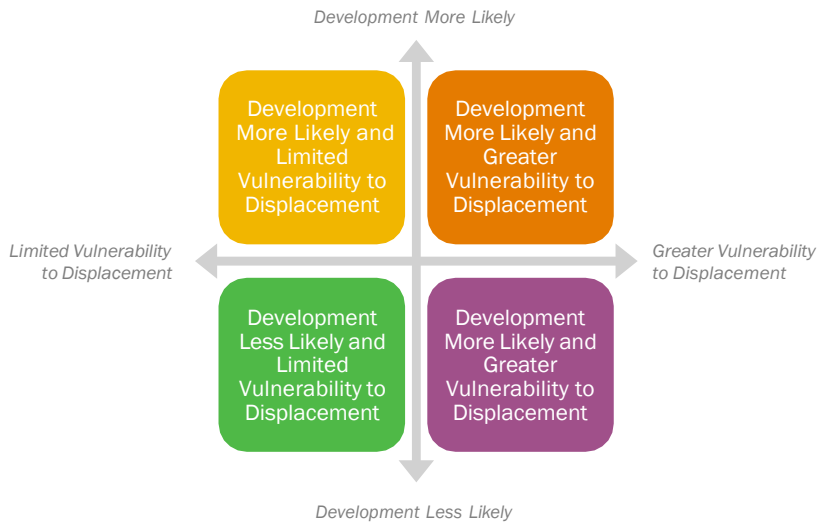
marginal increases in development value from the ADU allowances were realized across all focus areas and not disproportionately realized in areas with greater vulnerability to displacement.

However, this analysis did find that some of the focus areas evaluated are more likely to see potential displacement pressures than others. These displacement pressures are not the direct result of increases in development allowances from the ADU code changes, but rather are likely the result of cumulative disparate impacts from historic land use policy and land use decisions. The proviso directed this work to identify the impact from very specific, and narrow, regulatory changes that allow for ADUs in townhouses. These regulatory changes could result in marginal increases in townhouse feasibility in areas that are already experiencing development feasibility and greater vulnerability from a legacy of land use policies that were made without considering racial equity impacts. Some focus areas that are more vulnerable to displacement are also the focus areas that have a higher share of zoning that allows for more dense residential development, including townhouses.

### Framework for results and findings by focus areas

We arrived at understanding a focus area's development likelihood and vulnerability to displacement based on multiple various factors that composed each of the two tracks of our analysis, such as recent development trends, existing zoning, financial feasibility of townhouses with ADUs, existing equity frameworks using census demographic information (e.g., the UDP and OESJ methodologies), and the parcel-level assessment of vulnerability. For each of the focus areas we have created summary maps, charts, and other data that summarize the results of our analysis.

In addition to the summary maps and charts for each focus area, we created a framework for summarizing where the results of the analysis fall in relation to both vulnerability to displacement and development likelihood. This framework helps to summarize focus area results for development likelihood ranging from more likely to less likely and vulnerability to displacement ranging from greater vulnerability to limited vulnerability.

**Figure 12: Example of Equity Impact Results**

Source: ECONorthwest

## Summary of Results and Key Findings

All focus areas differ from one another in terms of vulnerability to displacement and development likelihood. This means the resulting racial equity impacts and displacement risk vary drastically.

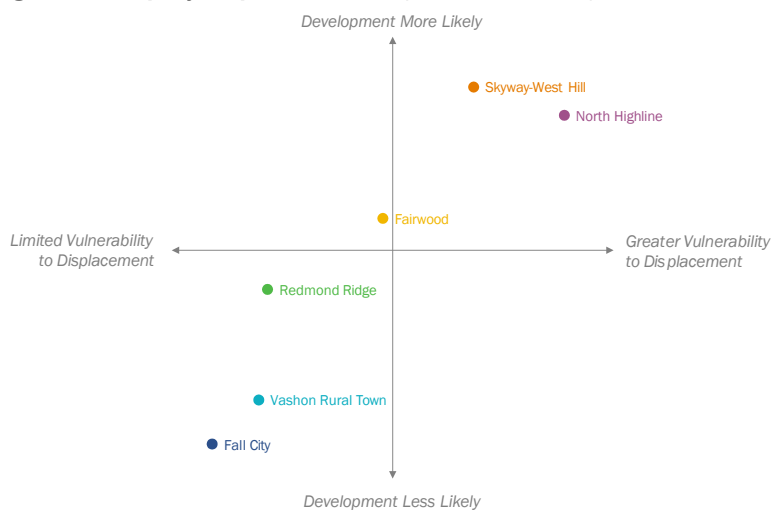
- North Highline has the greatest vulnerability risk of the focus areas and relatively high development likelihood.** It has seen substantial market interest for townhouses in recent years, and there could be a marginal increase in the ability for townhouses with ADUs to pay for land due to the regulation changes (however, townhouses were already feasible in much of the North Highline area). Not only are these townhouses with ADUs marginally more feasible, but they are also likely to be more feasible in more locations due to the existing land use pattern in North Highline compared to other focus areas.
- Skyway-West Hill has slightly greater development likelihood than North Highline and slightly lower vulnerability risk.** It has also seen substantial market interest for townhouses in recent years, and there could be a marginal increase in the ability for townhouses with ADUs to pay for land due to the regulation changes. Like in North Highline, these housing types are likely to be more feasible in more locations due to the existing land use pattern in Skyway-West Hill. While there are more parcels that could result in development in Skyway-West Hill, as compared to North Highline, the equity data from the UDP and OESJ methodologies indicate lower vulnerability to displacement.
- Fairwood has some development likelihood and some vulnerability to displacement.** It has seen substantial market interest for townhouses in recent years, but the feasibility results indicate there could be a lower marginal increase in the ability for townhouses with ADUs to pay for land as compared to North Highline and Skyway-West Hill. The marginal increase is also only the higher density zones like R-24 and R-48, the latter of

which is not currently mapped to many parcels in Fairwood. This focus area has fewer parcels that allow for townhouses, and substantially fewer households that are vulnerable to displacement as compared to other study areas. However, there could still be equity impacts if the zones that allow for townhouses were mapped to more areas in Fairwood.

- **Redmond Ridge has lower relative development likelihood and lower vulnerability to displacement.** While Redmond Ridge has seen substantial market interest for townhouses in recent years, there could be a marginal increase in development feasibility from these regulations is only in the highest density zone of R-48, which is not currently mapped to any parcels in Redmond Ridge. This focus area has fewer parcels that allow for townhouses, and substantially fewer households that are vulnerable to displacement, as compared to other study areas, given that the majority of parcels contain relatively new construction.
- **Vashon Rural Town has limited development likelihood and low vulnerability to displacement.** There has been limited market interest for townhouses in recent years and there could be a very limited increase in feasibility from these regulation changes, as townhouses were already somewhat feasible in the Vashon Rural Town. However, these changes could have an impact on development likelihood if higher density zones were applied in the Vashon Rural Town. This focus area has very few parcels that allow for townhouses, and fewer households that are vulnerable to displacement as compared to other study areas.
- **Fall City has the lowest development likelihood and the lowest vulnerability to displacement.** There has been limited market interest for townhouses in recent years and there could be a very limited increase in feasibility from these regulation changes, as townhouses were already somewhat feasible in Fall City. There is only one zone in Fall City that allows for townhouses, and it only allows townhouses as part of a mixed use development. Therefore, Fall City as a focus area has fewer parcels that allow for townhouses, and fewer households that are vulnerable to displacement as compared to other study areas.

We charted each focus area on an axis based on the various factors and results that composed the range of development likelihood and vulnerability to displacement (see Figure 13).

**Figure 13: Equity Impact Results (all focus areas)**



Source: ECONorthwest

## Focus Area 1: North Highline

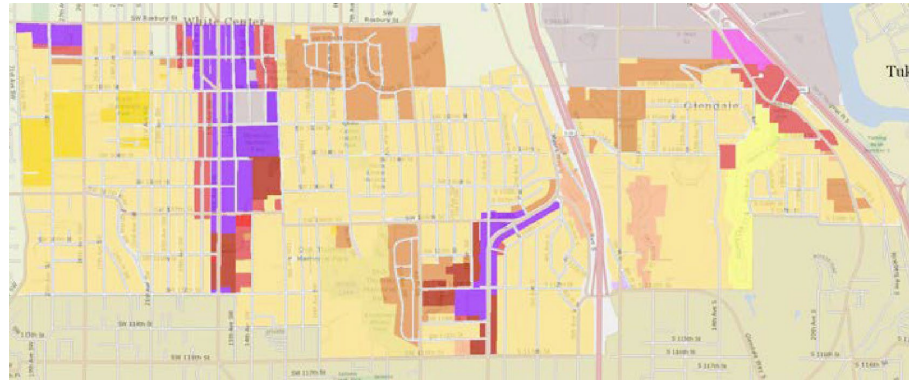
### Current Land Use Pattern

The North Highline focus area has approximately 1,000 parcels zoned to allow townhouses outright as a permitted use in zones R-12 through R-48 (13.6% of parcels in the focus area).



**Figure 14: North Highline Zoning map**

- R-1 - residential, one DU per acre
- R-4 - residential, 4 DU per acre
- R-6 - residential, 6 DU per acre
- R-8 - residential, 8 DU per acre
- R-12 - residential, 12 DU per acre
- R-18 - residential, 18 DU per acre
- R-24 - residential, 24 DU per acre
- R-48 - residential, 48 DU per acre
- NB - neighborhood business
- CB - community business
- RB - regional business
- O - office
- I - industrial



Source: King County iMap

### Development Likelihood in North Highline

The North Highline area has seen recent market interest in townhouses. Since 2010 approximately 550 townhouse units have been built in the focus area. This is in part due to the increased zoning allowances for townhouses, and likely in part due to proximity to Seattle and other market pressures similar to other close in King County locations.

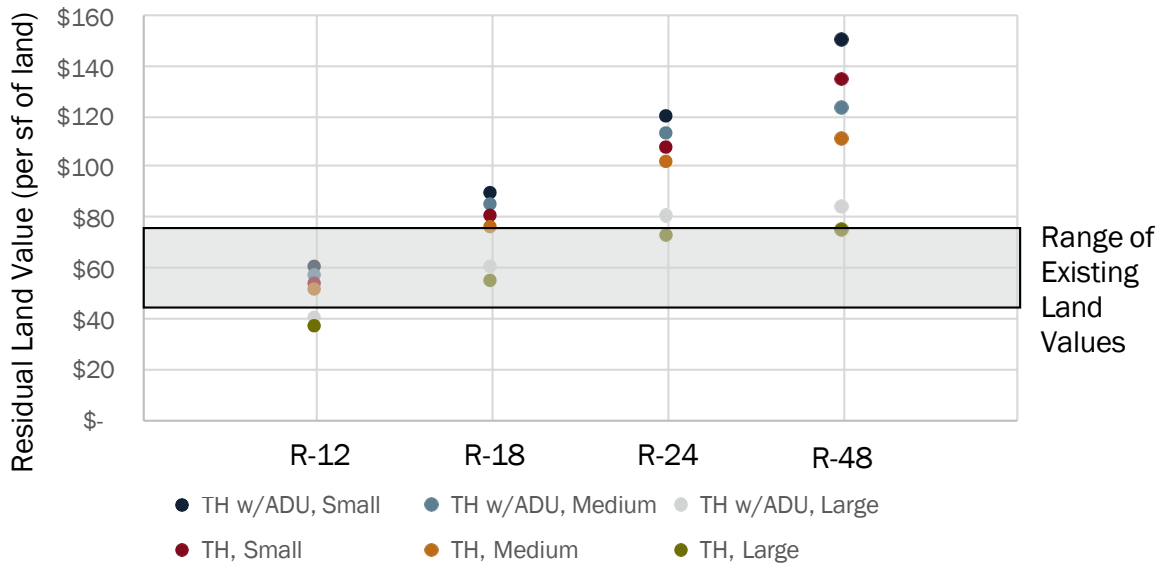
Existing land prices in North Highline, for properties zoned to allow townhouses, on average range from \$45 to \$75 per square foot of land (with improvements). Given this, multiple forms of townhouses could be able to pay for land at current prices. Adding the ADU to a townhouse increases the feasibility of development in each zone, especially in the higher density zones, like R-18 through R-48, which are prevalent in North Highline.

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**How to interpret the development likelihood charts in this section of the report.** Each dot represents the land budget needed to support development of that prototype within each zone. If the dot is within or above the grey box (existing land values), that prototype is financially feasible.

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**Figure 15: Development Likelihood in North Highline**

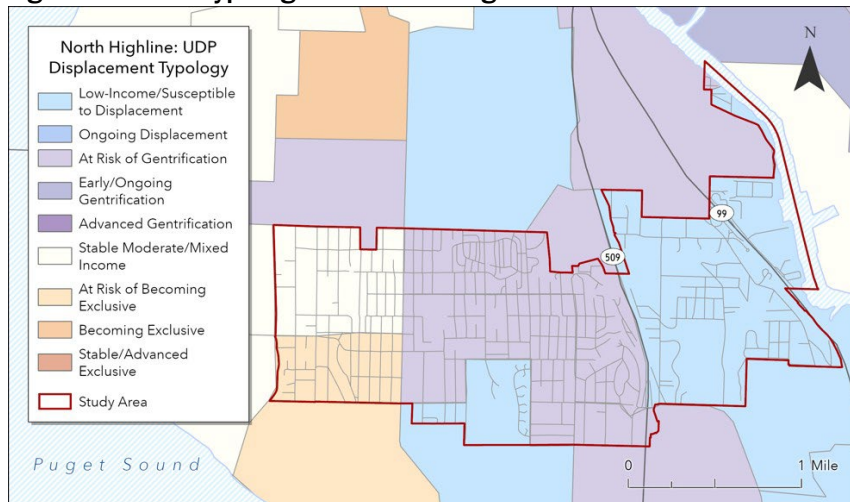


Source: ECONorthwest

### Vulnerability to Displacement in North Highline

According to Urban Displacement Project’s (UDP) methodology, the census tracts that intersect with North Highline contain a range of typologies, but almost all that indicate some level of vulnerability to displacement, specifically the areas that are zoned to allow the type of townhouses that are financially feasible. These areas are classified as “Low-Income/Susceptible to Displacement” and as “Risk of Gentrification.”

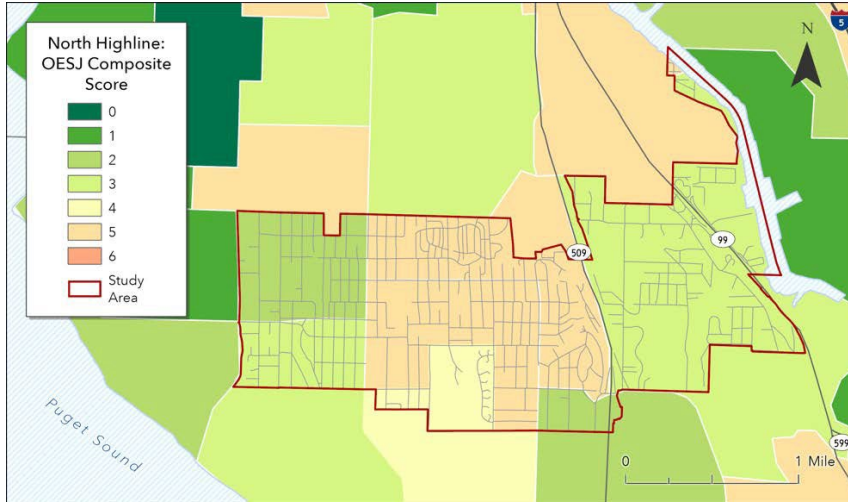
**Figure 16: UDP Typologies for North Highline**



Source: ECONorthwest and UDP

Employing King County’s Office of Equity and Social Justice’s methodology for a composite score for economic impact, but at the census tract level, we see a mix of composite scores near the top of the range – composite scores of 2 through 6 – which indicates a higher risk for economic impact as compared to other focus areas.

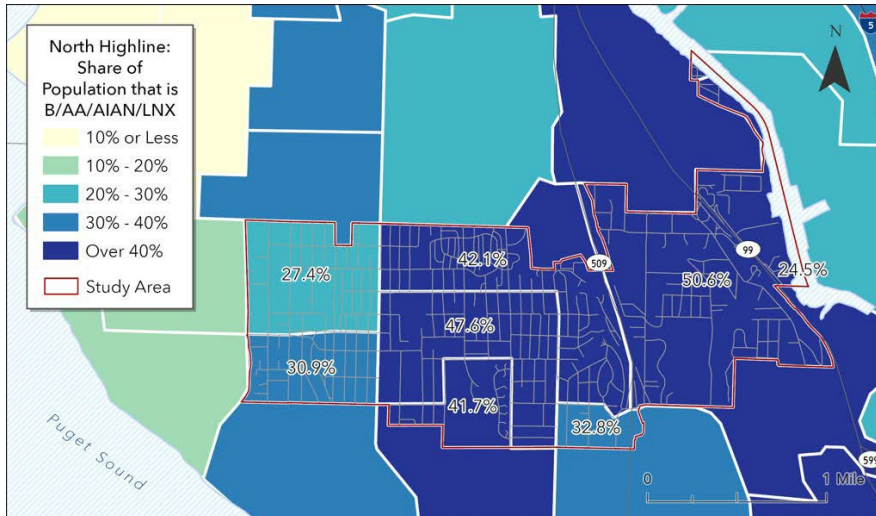
**Figure 17: OESJ Composite Scores for North Highline**



Source: ECONorthwest and King County OESJ

Although the OESJ composite score is inclusive of race, we have isolated that indicator given the specifics of the proviso language. The prior OESJ work indicated a high risk factor as having its “Black, American Indian/Alaska Native, and Latinx residents together exceed 10% of that community.” All of the census tracts that intersect with the North Highline area exceed this threshold.

**Figure 18: Percent of Population in North Highline that are Black, American Indian & Alaska Native, and Latinx**



Source: ECONorthwest and King County OESJ

Lastly, we estimated the number of tax lots with existing housing that are vulnerable to physical displacement.

**Figure 19: Vulnerability to displacement of existing housing units on tax lots in North Highline**

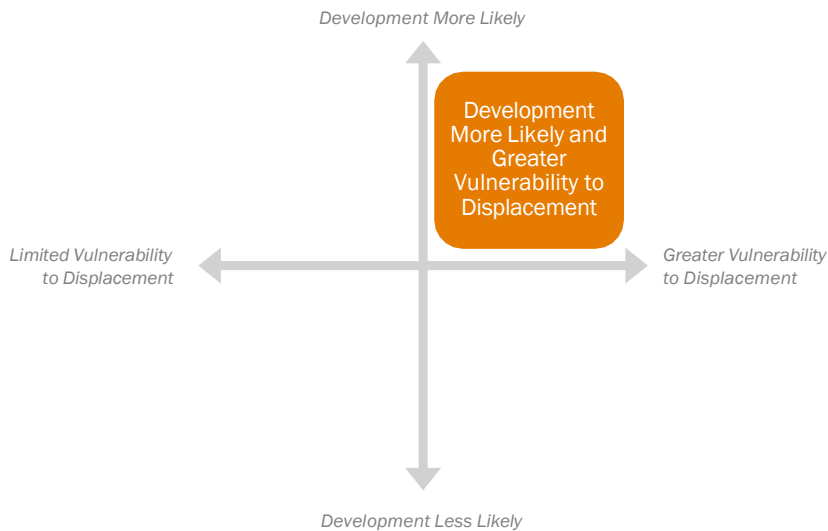
|  | Very High Risk | High Risk | Medium Risk |
|--|----------------|-----------|-------------|
| Number of parcels in zones R-12 through R-48 | 34             | 30        | 36          |
| Number of parcels in other zones             | 207            | 220       | 265         |

Source: ECONorthwest

### Displacement Risk and Equity Impact in North Highline

- Marginal increment in the ability for townhouses with ADUs to pay for land, however, townhouses were already feasible in the zones where there is development likelihood for townhouses with ADUs.
- Where this might have more impact is on the lower density zones where townhouses were close to being financially feasible - these regulatory changes increase that likelihood marginally.
- Not only are these townhouses with ADUs marginally more feasible, they are likely to be more feasible in more locations due to the existing land use pattern in North Highline.
- North highline as a focus area has both more parcels that allow for townhouses, more households of color, and more households that are vulnerable to displacement.

**Figure 20: Equity Impact Results for North Highline**



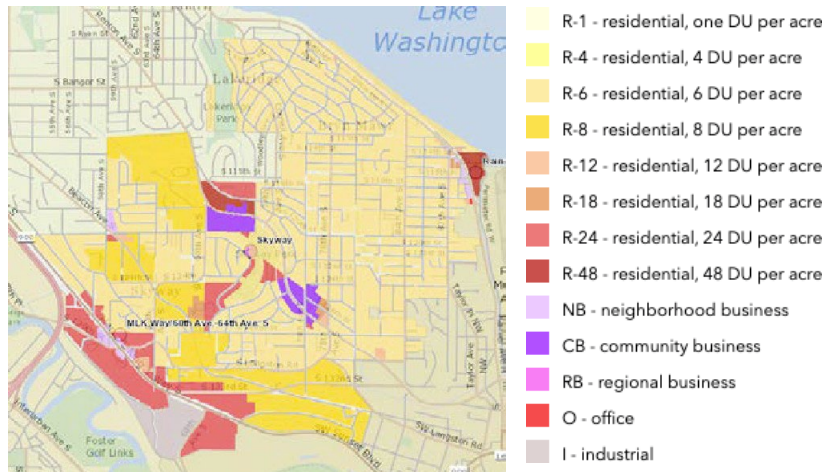
Source: ECONorthwest

## Focus Area 2: Skyway-West Hill

### Current Land Use Pattern

The Skyway-West Hill focus area has 196 parcels zoned to allow townhouses outright as a permitted use in zones R-12 through R-48 (9.9% of parcels in the focus area).

**Figure 21: Skyway-West Hill Zoning map**



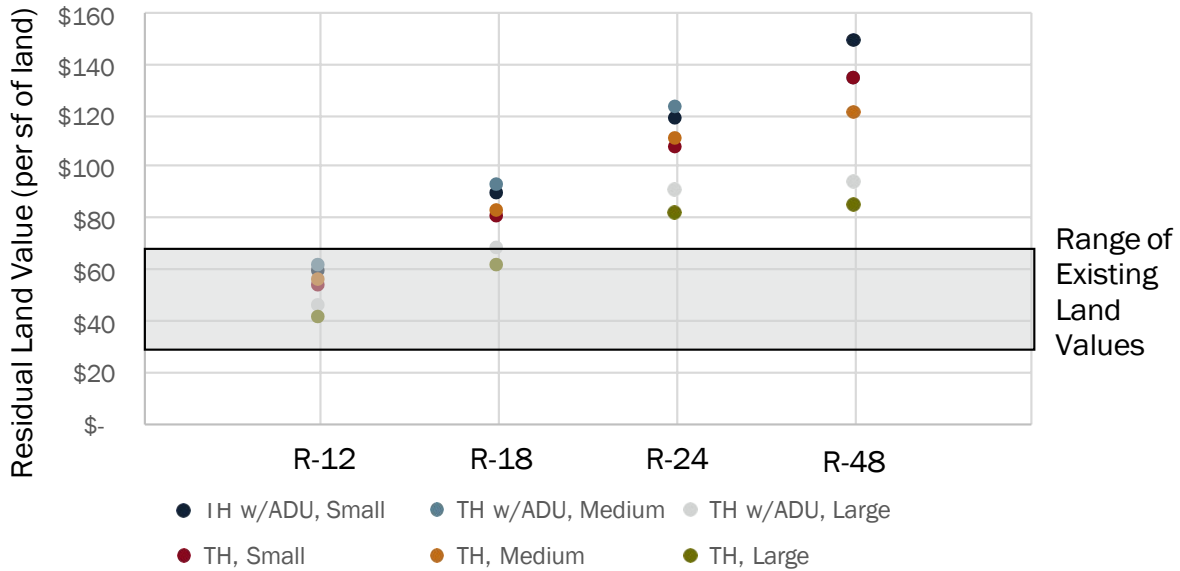
Source: King County iMap

### Development Likelihood in Skyway-West Hill

The Skyway-West Hill area has seen some recent market interest in townhouses. Since 2010 approximately 165 townhouse units have been built in the focus area. This is in part due to the increased zoning allowances for townhouses, and likely in part due to proximity to Seattle and the associated market pressures.

Existing land prices in Skyway-West Hill, for properties zoned to allow townhouses, on average range from \$30 to \$70 per square foot of land (with improvements). Given this, multiple forms of townhouses could be able to pay for land at current prices. Adding the ADU to a townhouse increases the feasibility of development in each zone, especially in the higher density zones, like R-18 through R-48, which are prevalent in Skyway-West Hill.

**Figure 22: Development Likelihood in Skyway-West Hill**

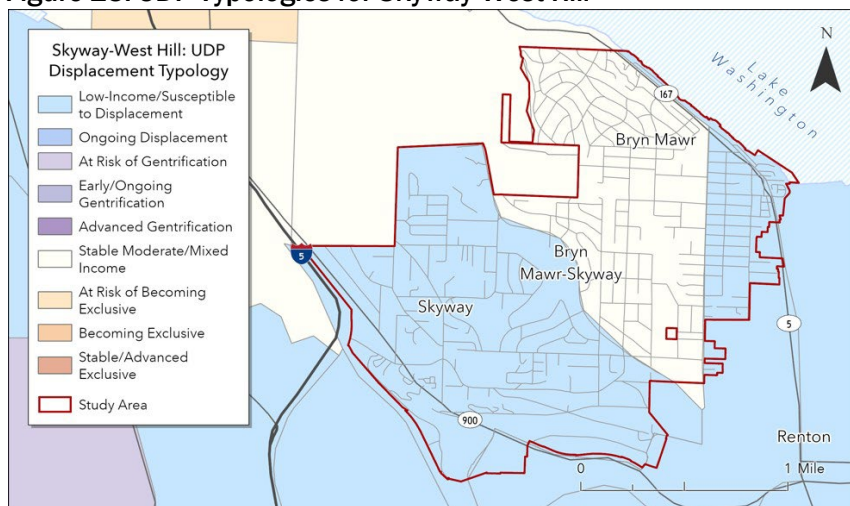


Source: ECONorthwest

### Vulnerability to Displacement in Skyway-West Hill

According to Urban Displacement Project’s (UDP) methodology, the census tracts that intersect with Skyway-West Hill contain a range of typologies, but almost all that indicate some level of vulnerability to displacement, specifically the areas that are zoned to allow the type of townhouses that are financially feasible. These areas are classified as “Low-Income/Susceptible to Displacement” and as “Stable Moderate/Mixed Income.”

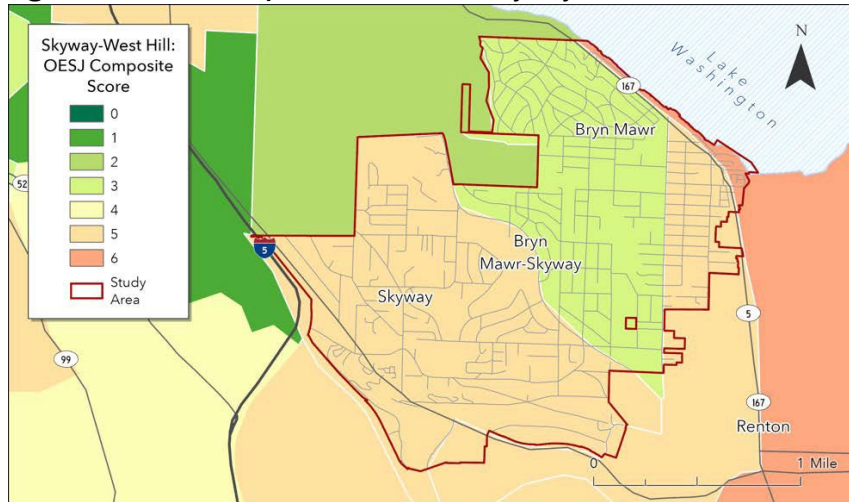
**Figure 23: UDP Typologies for Skyway-West Hill**



Source: ECONorthwest and UDP

Employing King County’s Office of Equity and Social Justice’s methodology for a composite score for economic impact, but at the census tract level, we see a mix of composite scores near the top of the range – composite scores of 3 through 5 – which indicates a higher risk for economic impact as compared to other focus areas.

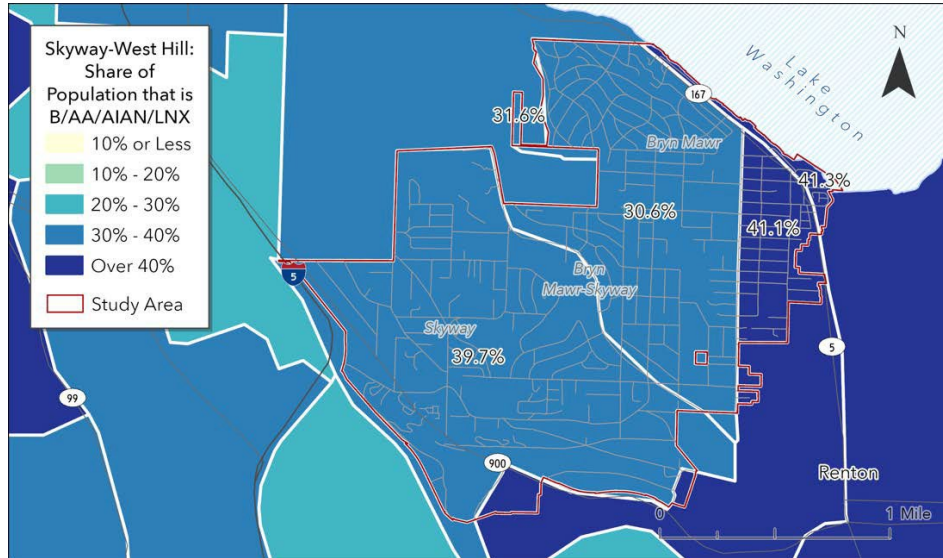
**Figure 24: OESJ Composite Scores for Skyway-West Hill**



Source: ECONorthwest and King County OESJ

Although the OESJ composite score is inclusive of race, we have isolated that indicator given the specifics of the proviso language. The prior OESJ work indicated a high risk factor as having its “Black, American Indian/Alaska Native, and Latinx residents together exceed 10% of that community.” All of the census tracts that intersect with the Skyway-West Hill area exceed this threshold.

**Figure 25: Percent of Population in Skyway-West Hill that are Black, American Indian & Alaska Native, and Latinx**



Source: ECONorthwest and King County OESJ

Lastly, we estimated the number of tax lots with existing housing that are vulnerable to physical displacement.

**Figure 26: Vulnerability to displacement of existing housing units on tax lots in Skyway-West Hill**

|  | Very High Risk | High Risk | Medium Risk |
|--|----------------|-----------|-------------|
| Number of parcels in zones R-12 through R-48 | 52             | 48        | 7           |
| Number of parcels in other zones             | 179            | 198       | 293         |

Source: ECONorthwest

### Displacement Risk and Equity Impact in Skyway-West Hill

- Marginal increment in the ability for townhouses with ADUs to pay for land, however, townhouses were already feasible in the zones where there is development likelihood for townhouses with ADUs.
- This might have more impact in the lower density zones where townhouses were close to being financially feasible - these regulatory changes could slightly increase that likelihood.
- Not only are these townhouses with ADUs marginally more feasible, they are likely to be more feasible in more locations due to the existing land use pattern in Skyway-West Hill.
- Skyway-West Hill as a focus area has more parcels that allow for townhouses, more households of color, and more households that are vulnerable to displacement.



**Figure 27: Equity Impact Results for Skyway-West Hill**

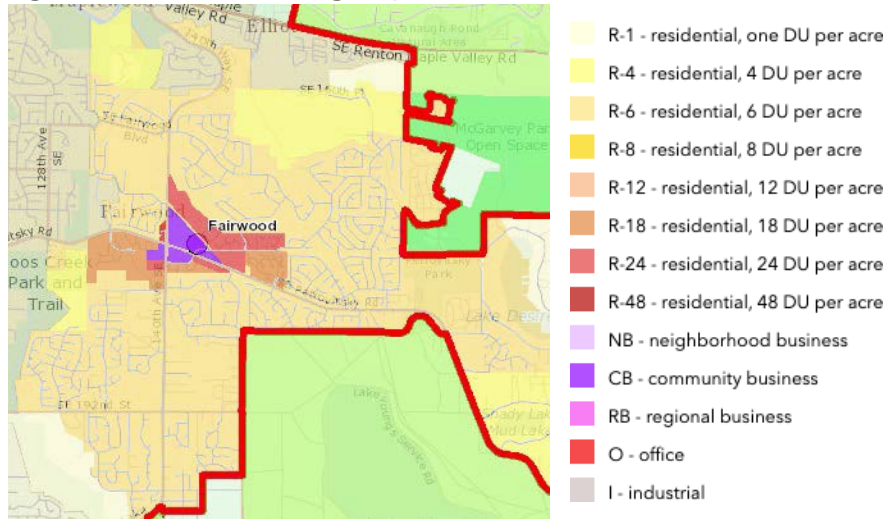


Source: ECONorthwest

### Focus Area 3: Fairwood

#### Current Land Use Pattern

The Fairwood focus area has 25 parcels zoned to allow townhouses outright as a permitted use in zones R-12 through R-48 (4.58% of parcels in the focus area).

**Figure 28: Fairwood Zoning map**

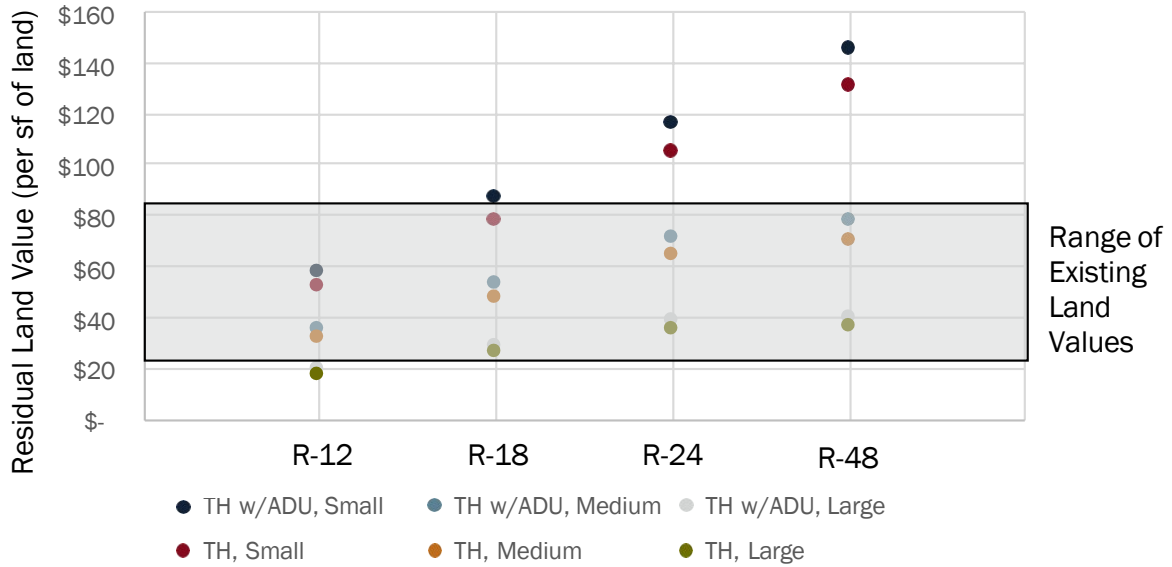
Source: King County iMap

### Development Likelihood in Fairwood

The Fairwood area has seen recent market interest in townhouses. Since 2010 approximately 425 townhouse units have been built in the focus area. This is likely due to proximity to multiple cities in King County which leads to higher market pressures as compared to other focus areas.

Existing land prices in Fairwood, for properties zoned to allow townhouses, on average range from \$25 to \$85 per square foot of land (with improvements). Given this, multiple forms of townhouses with ADUs could be able to pay for land at current prices, especially in the higher density zones, like R-24 and R-48. However, there is very little R-48 zoning in Fairwood, whereas R-18 and R-24 are more common.

**Figure 29: Development Likelihood in Fairwood**

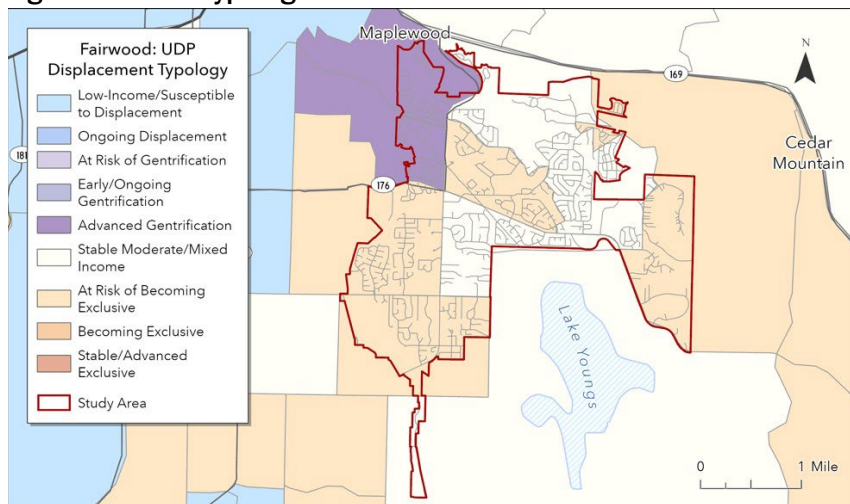


Source: ECONorthwest

**Vulnerability to Displacement in Fairwood**

According to Urban Displacement Project’s (UDP) methodology, the census tracts that intersect with Fairwood contain a range of typologies, but they indicate relative stability as compared to vulnerability to displacement. Most of the area is classified as “Stable Moderate/Mixed Income” or “At Risk of Becoming Exclusive” but there are also areas characterized as “Advanced Gentrification.”

**Figure 30: UDP Typologies for Fairwood**

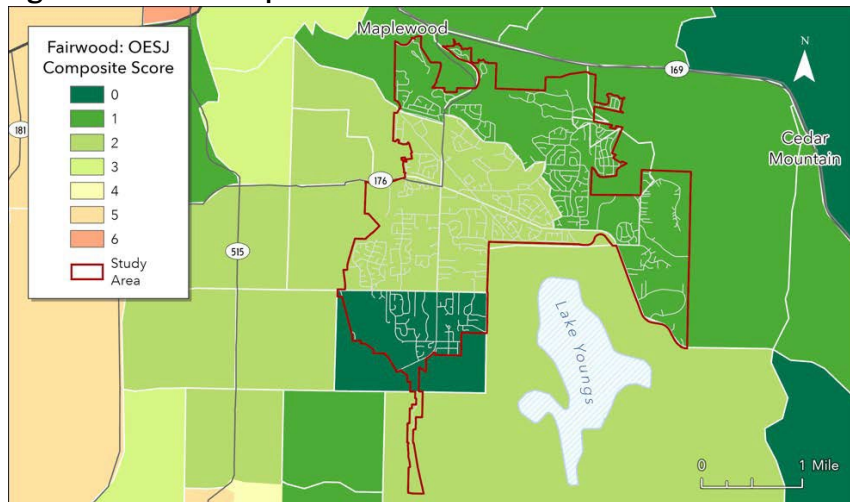


Source: ECONorthwest and UDP

Employing King County’s Office of Equity and Social Justice’s methodology for a composite score for economic impact, but at the census tract level, we see a mix of composite scores near

the bottom of the range – composite scores of 0 through 2 – which indicates a low risk for economic impact.

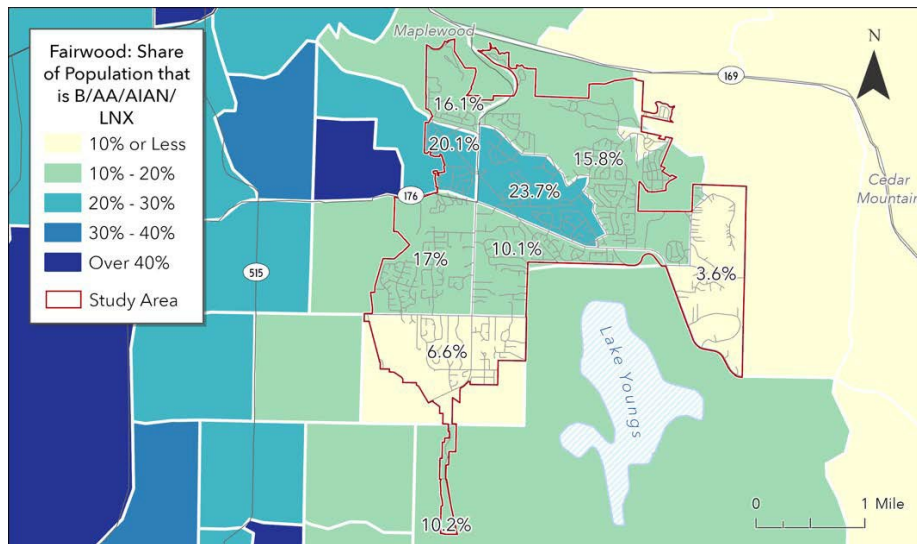
**Figure 31: OESJ Composite Scores for Fairwood**



Source: ECONorthwest and King County OESJ

Although the OESJ composite score is inclusive of race, we have isolated that indicator given the specifics of the proviso language. The prior OESJ work indicated a high risk factor as having its “Black, American Indian/Alaska Native, and Latinx residents together exceed 10% of that community.” Multiple of the census tracts that intersect with the Fairwood area exceed this threshold, but a couple are at or below it.

**Figure 32: Percent of Population in Fairwood that are Black, American Indian & Alaska Native, and Latinx**



Source: ECONorthwest and King County OESJ

Lastly, we estimated the number of tax lots with existing housing that are vulnerable to physical displacement. In Fairwood, the majority of the parcels that are zoned for townhouses have newer construction, meaning that there is likely very low vulnerability to displacement of existing housing units on tax lots in Fairwood.

**Figure 33: Vulnerability to displacement of existing housing units on tax lots in Fairwood**

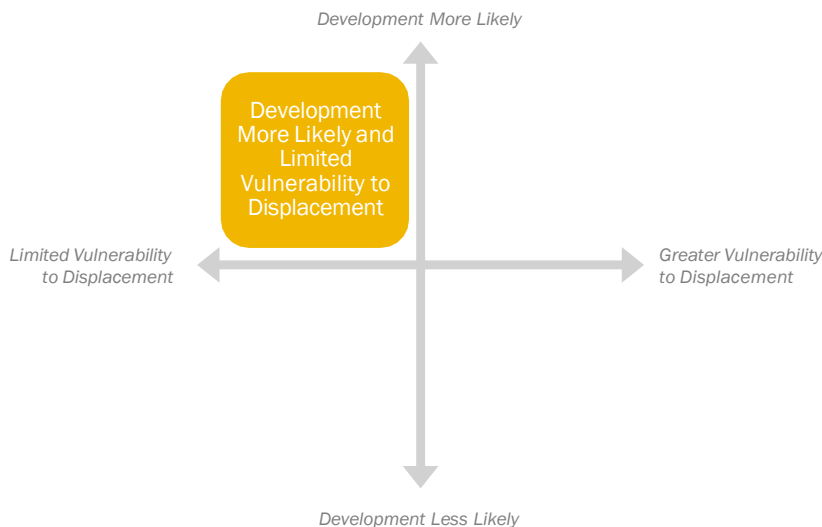
|  | Very High Risk | High Risk | Medium Risk |
|--|----------------|-----------|-------------|
| Number of parcels in zones R-12 through R-48 | 0              | 0         | 0           |
| Number of parcels in other zones             | 175            | 292       | 222         |

Source: ECONorthwest

### Displacement Risk and Equity Impact in Fairwood

- Marginal increment in the ability for townhouses with ADUs to pay for land, however, this would only increase development likelihood in the higher density zones like R-24 and R-48, the latter of which is applied to only a few small parcels in Fairwood.
- This might have more impact in the lower density zones, such as R-18, where townhouses were close to being financially feasible - these regulatory changes increase that likelihood marginally. However, lower density zones that permit townhouses without conditions aren't currently mapped in Fairwood.
- Fairwood as a focus area has fewer parcels that allow for townhouses, and substantially fewer households that are vulnerable to displacement as compared to other study areas. However, there could still be equity impacts if the zones that allow for townhouses were mapped to more areas in Fairwood.

**Figure 34: Equity Impact Results for Fairwood**



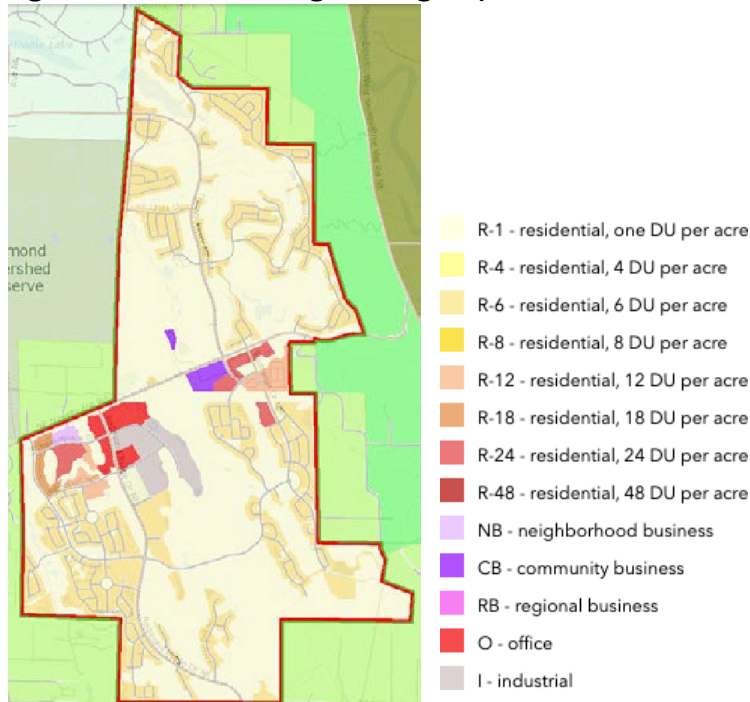
Source: ECONorthwest

## Focus Area 4: Redmond Ridge

### Current Land Use Pattern

The Redmond Ridge focus area has 18 parcels zoned to allow townhouses outright as a permitted use in zones R-12 through R-48 (3.15% of parcels in the focus area).

**Figure 35: Redmond Ridge Zoning map**



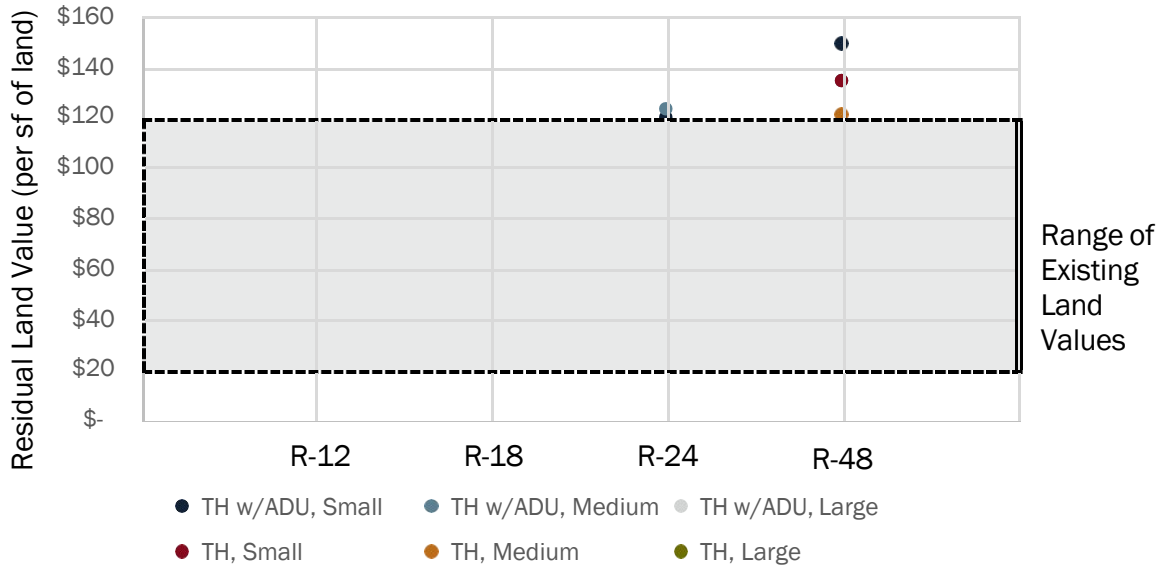
Source: King County iMap

### Development Likelihood in Redmond Ridge

The Redmond Ridge area has seen recent market interest in townhouses. Since 2010 approximately 705 townhouse units have been built in the focus area. This is in part due to the increased zoning allowances for townhouses, and likely in part due to proximity to Redmond and other market pressures.

Existing land prices in Redmond Ridge, for properties zoned to allow townhouses, on average range from \$20 to \$120 per square foot of land (with improvements). Given this, very few forms of townhouses with ADUs could be able to pay for land at current prices, likely only in the R-48 zones which aren't currently mapped in Redmond Ridge.

**Figure 36: Development Likelihood in Redmond Ridge**

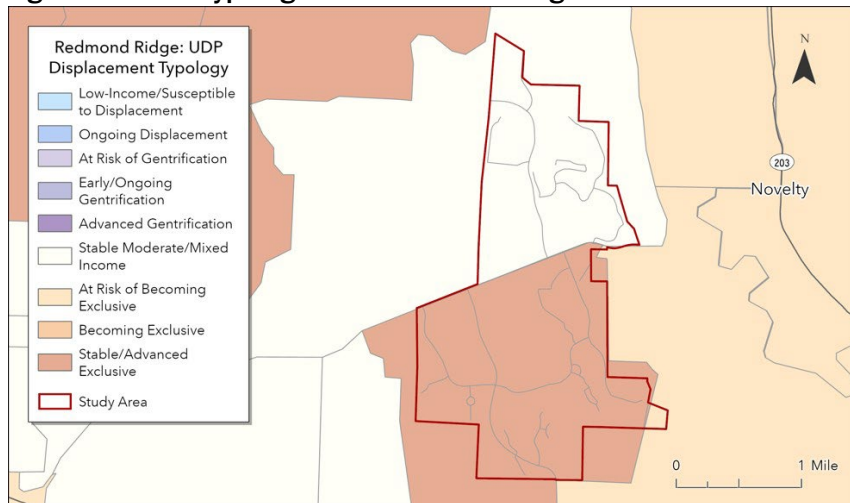


Source: ECONorthwest

### Vulnerability to Displacement in Redmond Ridge

According to Urban Displacement Project’s (UDP) methodology, the census tracts that intersect with Redmond Ridge contain a range of typologies, but they indicate relative stability as compared to vulnerability to displacement. These areas are classified as “Stable Moderate/Mixed Income” and as “Stable/Advanced Exclusive.”

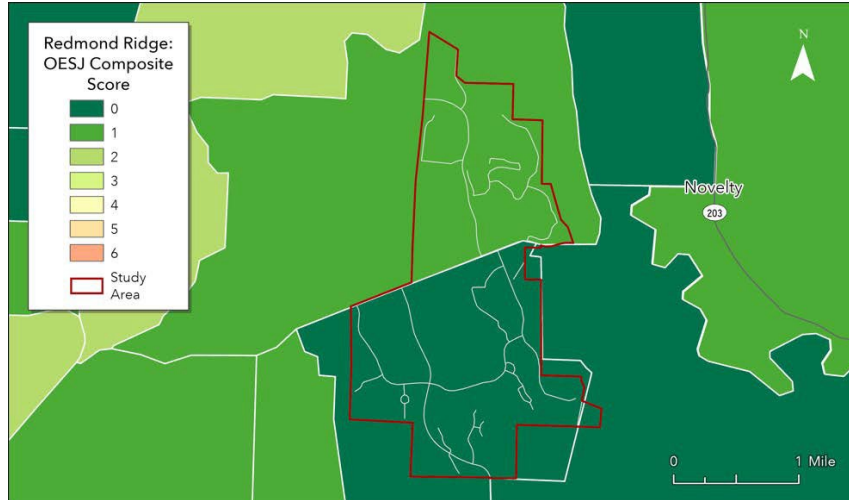
**Figure 37: UDP Typologies for Redmond Ridge**



Source: ECONorthwest and UDP

Employing King County’s Office of Equity and Social Justice’s methodology for a composite score for economic impact, but at the census tract level, we see a mix of composite scores near the bottom of the range – composite scores of 0 through 1 – which indicates a low risk for economic impact.

**Figure 38: OESJ Composite Scores for Redmond Ridge**

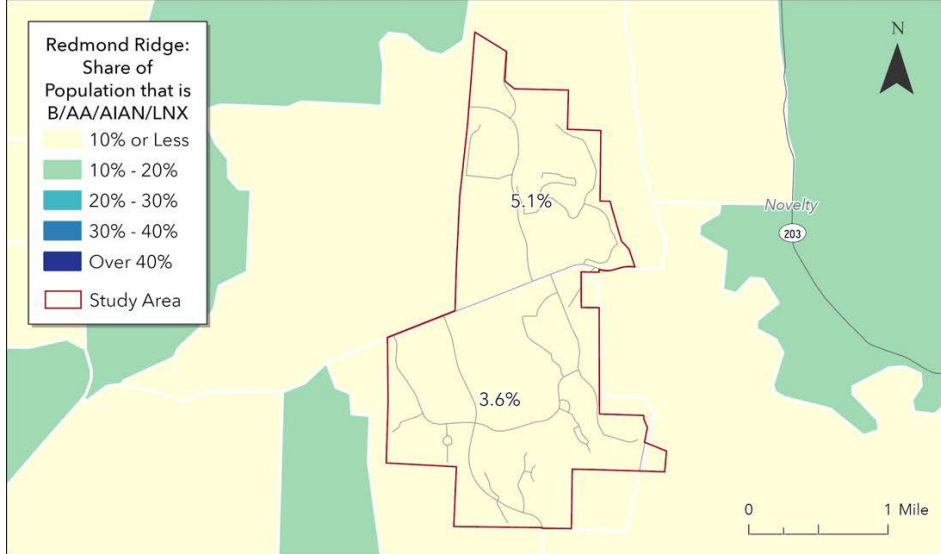


Source: ECONorthwest and King County OESJ

Although the OESJ composite score is inclusive of race, we have isolated that indicator given the specifics of the proviso language. The prior OESJ work indicated a high risk factor as having its “Black, American Indian/Alaska Native, and Latinx residents together exceed 10% of that community.” The two census tracts that intersect with the Redmond Ridge area are both well below this threshold.



**Figure 39: Percent of Population in Redmond Ridge that are Black, American Indian & Alaska Native, and Latinx**



Source: ECONorthwest and King County OESJ

Lastly, we estimated the number of tax lots with existing housing that are vulnerable to physical displacement. In Redmond Ridge, the majority of the parcels that are zoned for townhouses have newer construction, meaning that there is likely very low vulnerability to displacement of existing housing units on tax lots in Redmond Ridge.

**Figure 40: Vulnerability to displacement of existing housing units on tax lots in Redmond Ridge**

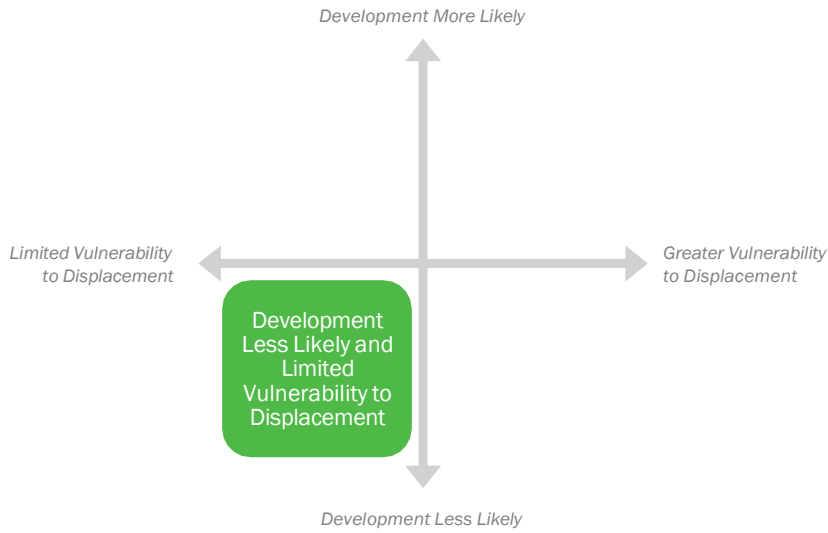
|  | Very High Risk | High Risk | Medium Risk |
|--|----------------|-----------|-------------|
| Number of parcels in zones R-12 through R-48 | 0              | 0         | 0           |
| Number of parcels in other zones             | 0              | 0         | 0           |

Source: ECONorthwest

### Displacement Risk and Equity Impact in Redmond Ridge

- Marginal increment in the ability for townhouses with ADUs to pay for land, however, this would only increase development likelihood in the highest density zone of R-48, which is not mapped to any parcels in Redmond Ridge.
- Redmond Ridge as a focus area has fewer parcels that allow for townhouses, and substantially fewer households that are vulnerable to displacement as compared to other study areas given that the majority are relatively new construction.

**Figure 41: Equity Impact Results for Redmond Ridge**

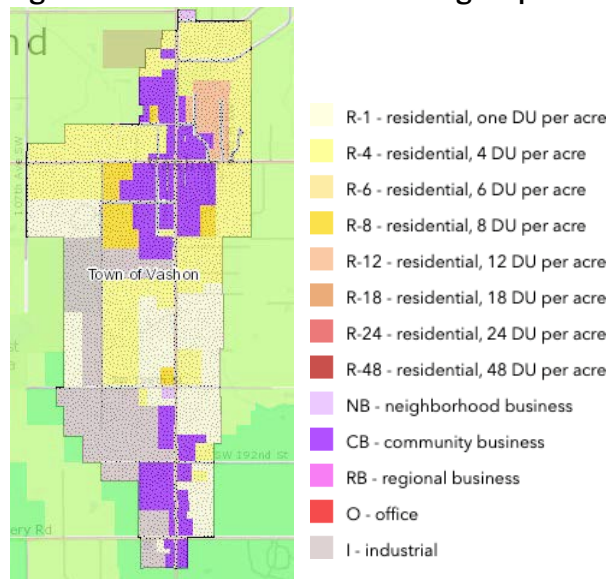


Source: ECONorthwest

## Focus Area 5: Vashon Rural Town

### Current Land Use Pattern

The Vashon Rural Town focus area has 46 parcels zoned to allow townhouses outright as a permitted use in zones R-12 through R-48 (2.85% of parcels in the focus area). In addition to the focus area, there are a couple parcels elsewhere on the island that are zoned to allow townhouses with development conditions.

**Figure 42: Vashon Rural Town Zoning map**

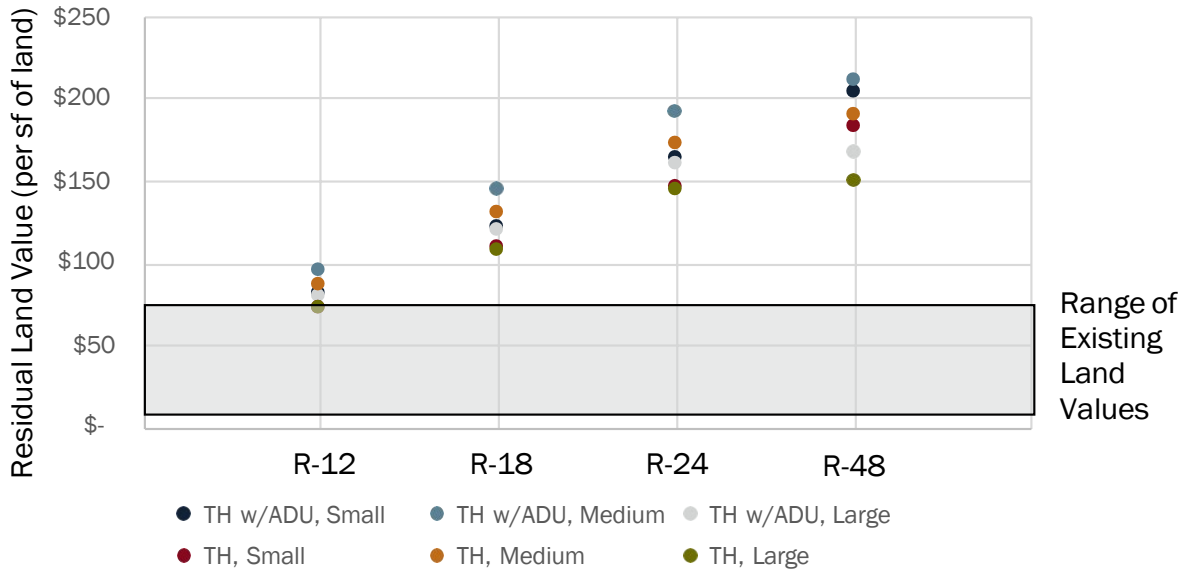
Source: King County iMap

## Development Likelihood in Vashon Rural Town

The Vashon Rural Town area has seen limited market interest in townhouses. Since 2010 approximately 20 townhouse units have been built in the focus area. This is in part due to the limited zoning allowances for townhouses, and also in part due to limited market interest.

Existing land prices in the Vashon Rural Town, for properties zoned to allow townhouses, on average range from \$10 to \$75 per square foot of land (with improvements). Given this, multiple forms of townhouses with ADUs could be able to pay for land at current prices, however, only the R-12 zone is currently mapped in the Vashon Rural Town which limits the development likelihood.

**Figure 43: Development Likelihood in the Vashon Rural Town**

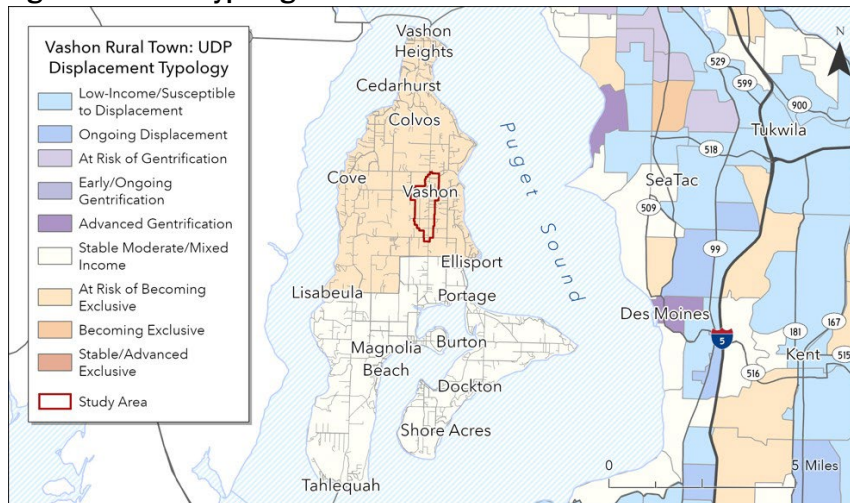


Source: ECONorthwest

### Vulnerability to Displacement in the Vashon Rural Town

According to Urban Displacement Project’s (UDP) methodology, the census tract that includes the Vashon Rural Town focus area indicates relative stability as compared to vulnerability to displacement. The area is classified as “At Risk of Becoming Exclusive.”

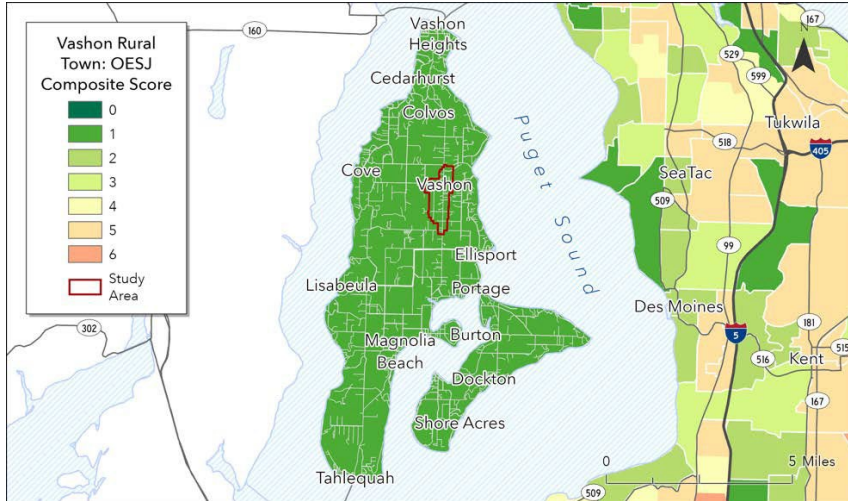
**Figure 44: UDP Typologies for the Vashon Rural Town**



Source: ECONorthwest and UDP

Employing King County’s Office of Equity and Social Justice’s methodology for a composite score for economic impact, but at the census tract level, we see a composite score at the bottom of the range – a composite score of 1 – which indicates a low risk for economic impact.

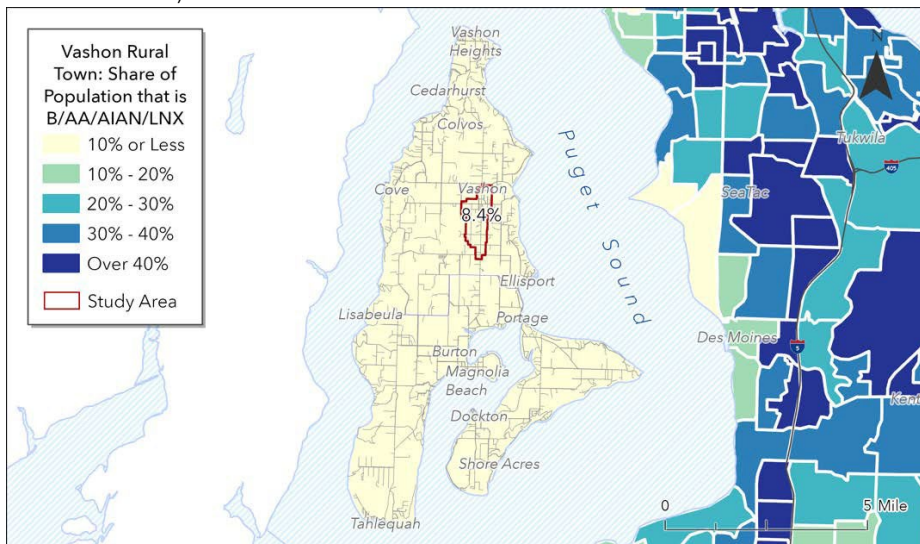
**Figure 45: OESJ Composite Scores for the Vashon Rural Town**



Source: ECONorthwest and King County OESJ

Although the OESJ composite score is inclusive of race, we have isolated that indicator given the specifics of the proviso language. The prior OESJ work indicated a high risk factor as having its “Black, American Indian/Alaska Native, and Latinx residents together exceed 10% of that community.” The census tract that intersects with the Vashon Rural Town is below this threshold.

**Figure 46: Percent of Population in the Vashon Rural Town that are Black, American Indian & Alaska Native, and Latinx**



Source: ECONorthwest and King County OESJ

Lastly, we estimated the number of tax lots with existing housing that are vulnerable to physical displacement.

**Figure 47: Vulnerability to displacement of existing housing units on tax lots in the Vashon Rural Town**

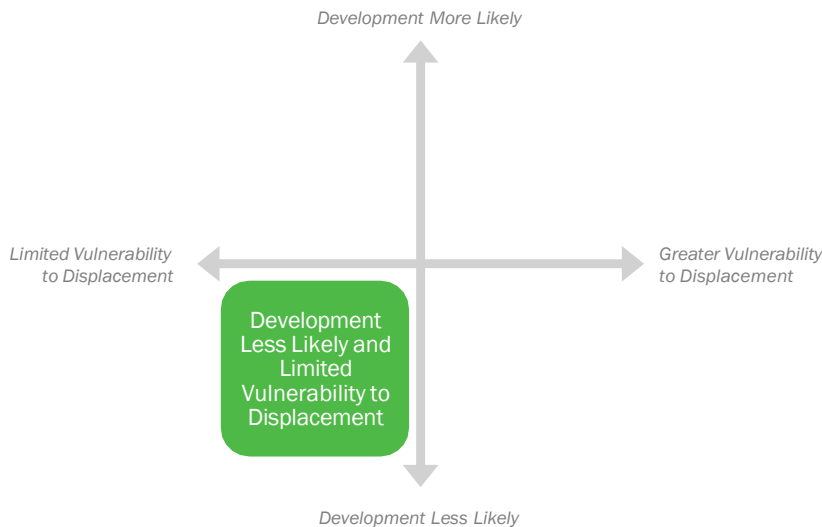
|  | Very High Risk | High Risk | Medium Risk |
|--|----------------|-----------|-------------|
| Number of parcels in zones R-12 through R-48 | 3              | 1         | 10          |
| Number of parcels in other zones             | 12             | 26        | 10          |

Source: ECONorthwest

### Displacement Risk and Equity Impact in the Vashon Rural Town

- Very marginal increment in the ability for townhouses with ADUs to pay for land, as townhouses were already somewhat feasible in the Vashon Rural Town.
- This might have more impact in higher density zones if they were applied in the Vashon Rural Town.
- The Vashon Rural Town, as a focus area, has fewer parcels that allow for townhouses, and fewer households that are vulnerable to displacement as compared to other study areas. There is has also been historically limited development interest in townhouses.

**Figure 48: Equity Impact Results for the Vashon Rural Town**

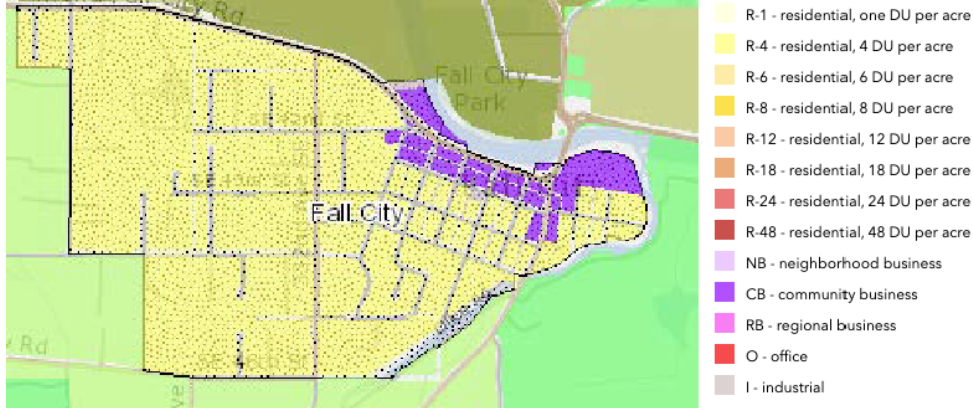


Source: ECONorthwest

### Focus Area 6: Fall City

#### Current Land Use Pattern

The Fall City focus area does not have any parcels that are zoned to allow townhouses outright as a permitted use, and instead only parcels that are zoned to allow townhouses as part of a mixed-use development, subject to conditions, or in zones with density limitations that does not work for feasible townhouse development.

**Figure 49: Fall City Zoning map**

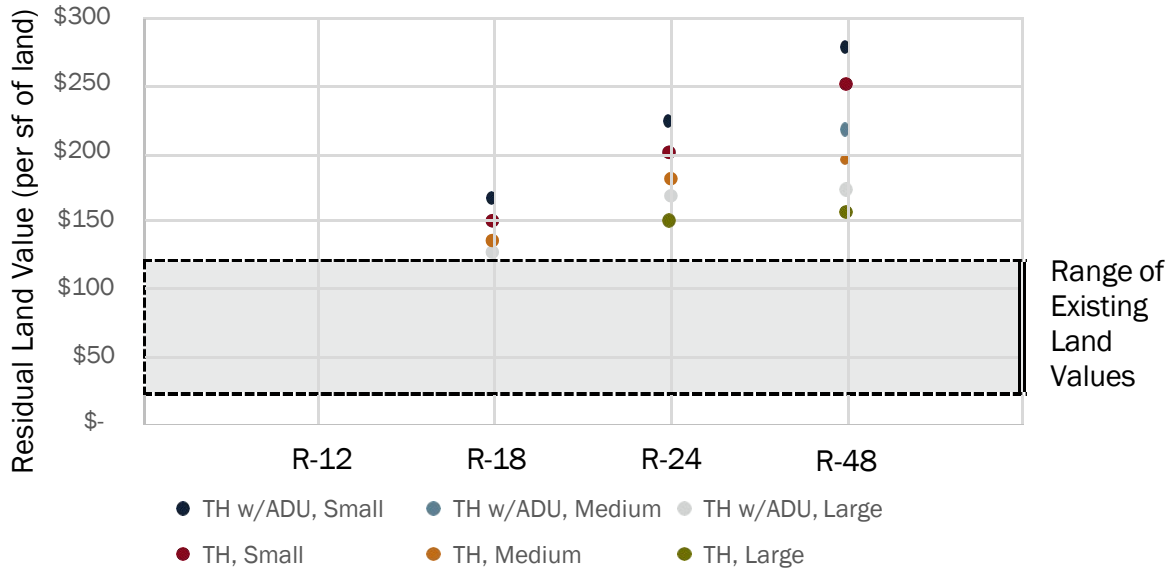
Source: King County iMap

### Development Likelihood in Fall City

The Fall City focus area has seen limited market interest in townhouses. Since 2010, fewer than 20 townhouse units have been built in the focus area. This is in part due to the limited zoning allowances for townhouses, and also in part due to limited market interest.

Given that there are no parcels zoned to allow townhouses at densities that make sense over single family residential development, we estimated the existing land prices for Fall City based on the other study areas to be \$20 to \$120 per square foot of land (with improvements). Based on our estimate of current land prices, multiple forms of townhouses with ADUs could be able to pay for land. However, since only the CB zone is mapped, which includes development conditions that only allow townhouses as part of a mixed-use development, the development likelihood is limited.

**Figure 50: Development Likelihood in Fall City**

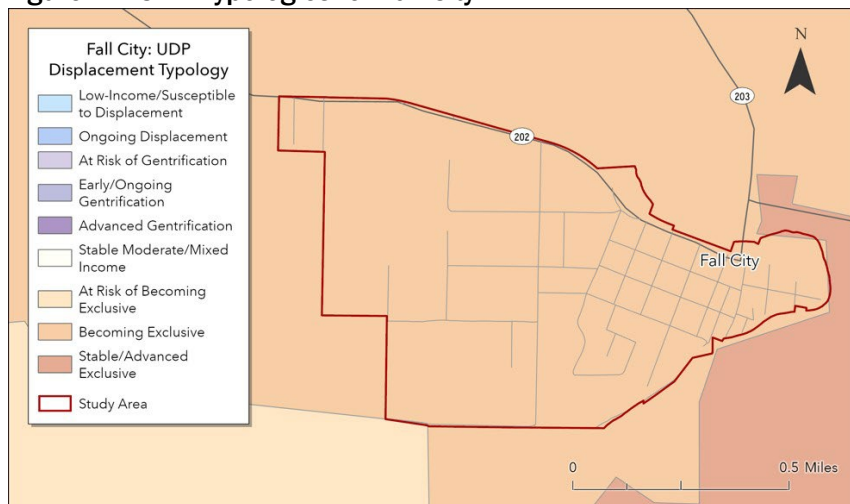


Source: ECONorthwest

### Vulnerability to Displacement in Fall City

According to Urban Displacement Project’s (UDP) methodology, the census tract that includes the Fall City focus area indicates stability as compared to vulnerability to displacement. The area is classified as “Becoming Exclusive.”

**Figure 51: UDP Typologies for Fall City**

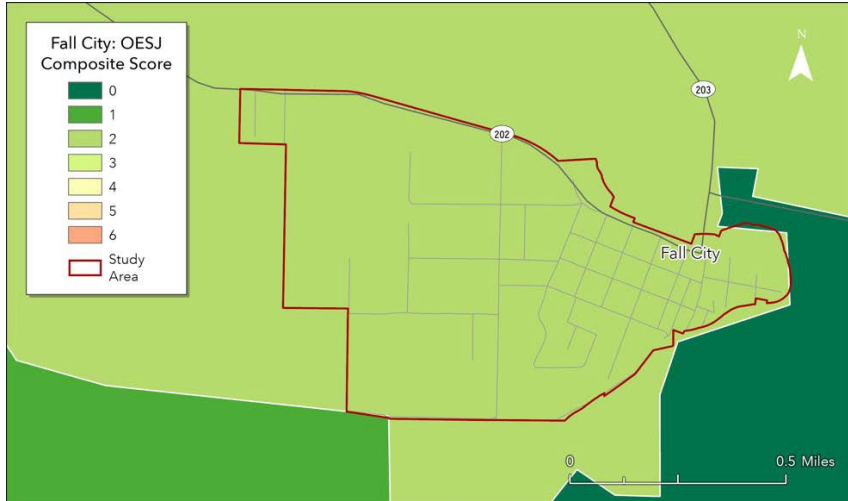


Source: ECONorthwest and UDP



Employing King County’s Office of Equity and Social Justice’s methodology for a composite score for economic impact, but at the census tract level, we see a composite score near the bottom of the range – a composite score of 2 – which indicates a low risk for economic impact.

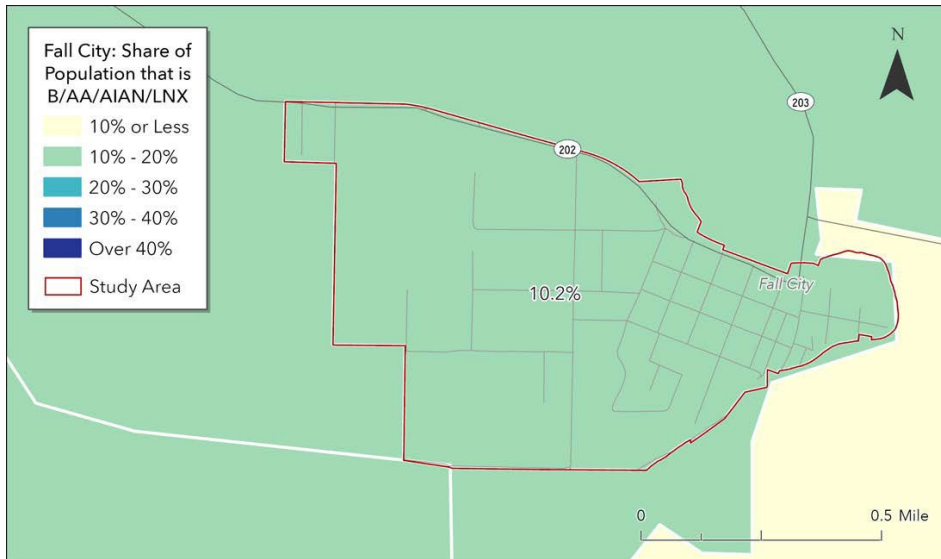
**Figure 52: OESJ Composite Scores for Fall City**



Source: ECONorthwest and King County OESJ

Although the OESJ composite score is inclusive of race, we have isolated that indicator given the specifics of the proviso language. The prior OESJ work indicated a high risk factor as having its “Black, American Indian/Alaska Native, and Latinx residents together exceed 10% of that community.” The census tract that intersects with the Fall City area is right at this threshold.

**Figure 53: Percent of Population in Fall City that are Black, American Indian & Alaska Native, and Latinx**



Source: ECONorthwest and King County OESJ

Lastly, we estimated the number of tax lots with existing housing that are vulnerable to physical displacement. In Fall City, there is likely very low vulnerability to displacement of existing housing units on tax lots.

**Figure 54: Vulnerability to displacement of existing housing units on tax lots in Fall City**

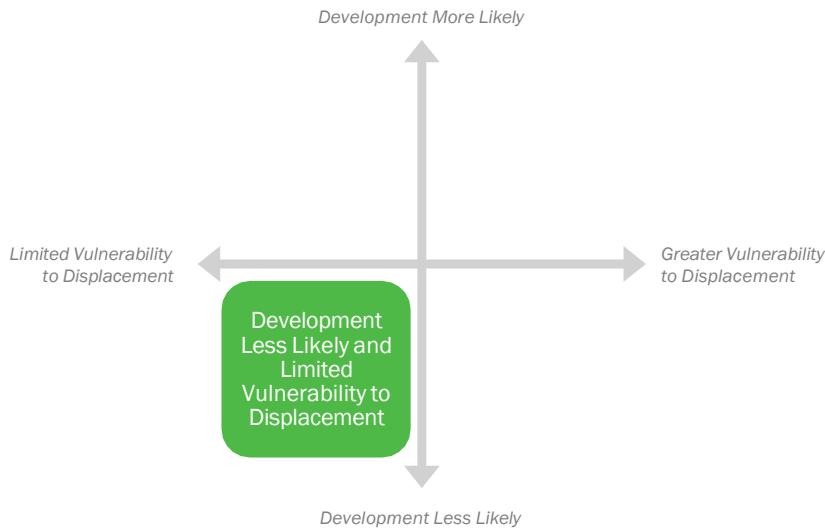
|  | Very High Risk | High Risk | Medium Risk |
|--|----------------|-----------|-------------|
| Number of parcels in zones R-12 through R-48 | 0              | 0         | 0           |
| Number of parcels in other zones             | 50             | 34        | 81          |

Source: ECONorthwest

### Displacement Risk and Equity Impact in Fall City

- Marginal increment in the ability for Townhouses with ADUs to pay for land, however, townhouses were already feasible in the zones where there is development likelihood for townhouses with ADUs.
- This might have more impact in higher density zones if they were applied in Fall City.
- Fall City as a focus area has fewer parcels that allow for townhouses, and fewer households that are vulnerable to displacement as compared to other study areas. There is has also been historically limited development interest in townhouses.

**Figure 55: Equity Impact Results for Fall City**



Source: ECONorthwest

# Technical Appendix

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## Equity Impact Maps and Details on Methodologies

The first track of our analysis is structured to provide a clear understanding of demographic conditions across King County with an emphasis on understanding vulnerability to displacement, specifically for communities of color. This analysis utilized existing methodologies used by both King County's Office of Equity and Social Justice (OESJ) and the University of California at Berkeley's Urban Displacement Project (UDP).

The King County OESJ has created both an Equity Impact Review Process and produced other work that analyzed equity impacts of policies and programs in King County. As a starting point for our analysis, we first replicated OESJ's Equity Impact Awareness Tool that was developed to help understand the impacts of COVID-19 and an associated King County program for locating and placing isolation / quarantine sites. This tool was based on the Center for Disease Control's Social Vulnerability Index. It evaluated multiple demographic data, identified indicators relevant to economic resiliency, and produced a composite score for identifying risk of prolonged economic impact from COVID-19. While this project is not related to health equity, the variables that make certain communities vulnerable to the economic impact from COVID-19 are similar to vulnerability from other forms of economic hardships, such as a displacement.

OESJ identified seven indicators based on demographic data related to race, asset poverty, income, home ownership, and age (see Figure 3). To arrive at a composite score, "the higher (>25%) threshold in the race indicator, the higher (>30%) income indicator and the asset poverty indicator are each scored as 2 points. The lower (>10%) Race indicator, the lower (>20%) income and the age indicator were each scored as 1 point."<sup>6</sup> For this report, we recreated the analysis at the census tract level and collected the data for these maps primarily from the 2018 American Community Survey (ACS), 5-year estimates. Below is a list of each indicator included in the composite score and the source of the data:

- **Race** - Share of population that is Black, American Indian / Alaska Native, and Latinx (B/AA/AIAN/LNX): ACS, Table B01001H
- **Asset Poverty** - Share of population that is experiencing food insecurity: ACS, Table S2201
- **Income** - Share of population that is within 200% of the Federal Poverty Level: ACS, Table B17026
- **Home Ownership** - Share of population that owns their home: ACS, Table S2502
- **Age** - Share of population that is age 65 and older: ACS, Table S0101

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<sup>6</sup> King County Office of Equity and Social Justice. <https://kingcounty.gov/~media/elected/executive/equity-social-justice/2020/COVID-19/OESJ-EIA-942020.ashx?la=en>

A second approach utilized in this report was to incorporate the methodology developed by the University of California at Berkeley's UDP. Since 2011, UDP has partnered with "universities, government agencies, philanthropy, and local organizations, in an effort to understand unique dynamics of displacement and potential negative impacts of gentrification on communities across the United States. These efforts have culminated in the creation of interactive typology maps, which summarize housing market dynamics and displacement and gentrification risk into eight distinct categories"<sup>7</sup> (see Figure 6). UDP has made their analysis code open source which allowed us to access their data and methods used for characterizing King County.

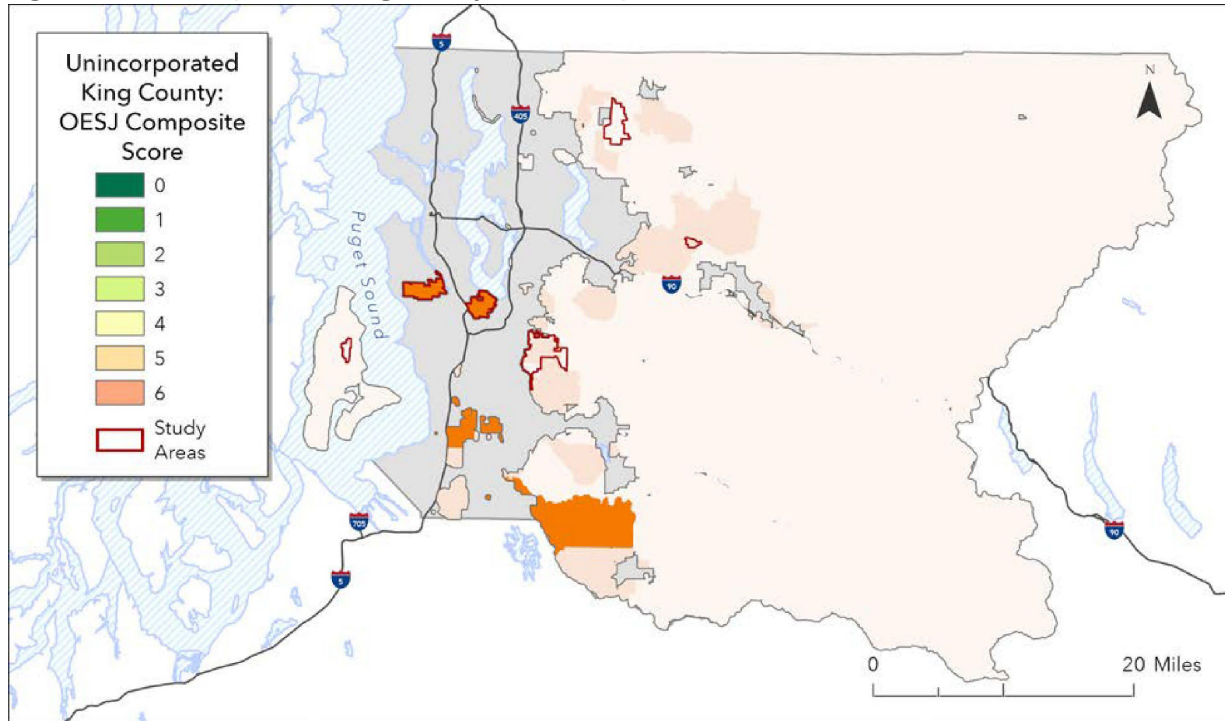
Although the UDP methodology does not currently incorporate race, it does incorporate income levels, and the change in income over time, as well as housing market prices. These differences created a nice complement to the OESJ approach. Additionally, the UDP approach not only characterized areas that were "susceptible to displacement" or "experiencing gentrification," but also areas that were "mixed income" and "exclusive" (see Figure 6 for typology definition).

In the following maps, we present the UDP typologies, and both the resulting OESJ composite scores as well the individual indicators. We do this for all of unincorporated King County as well as for each focus area.

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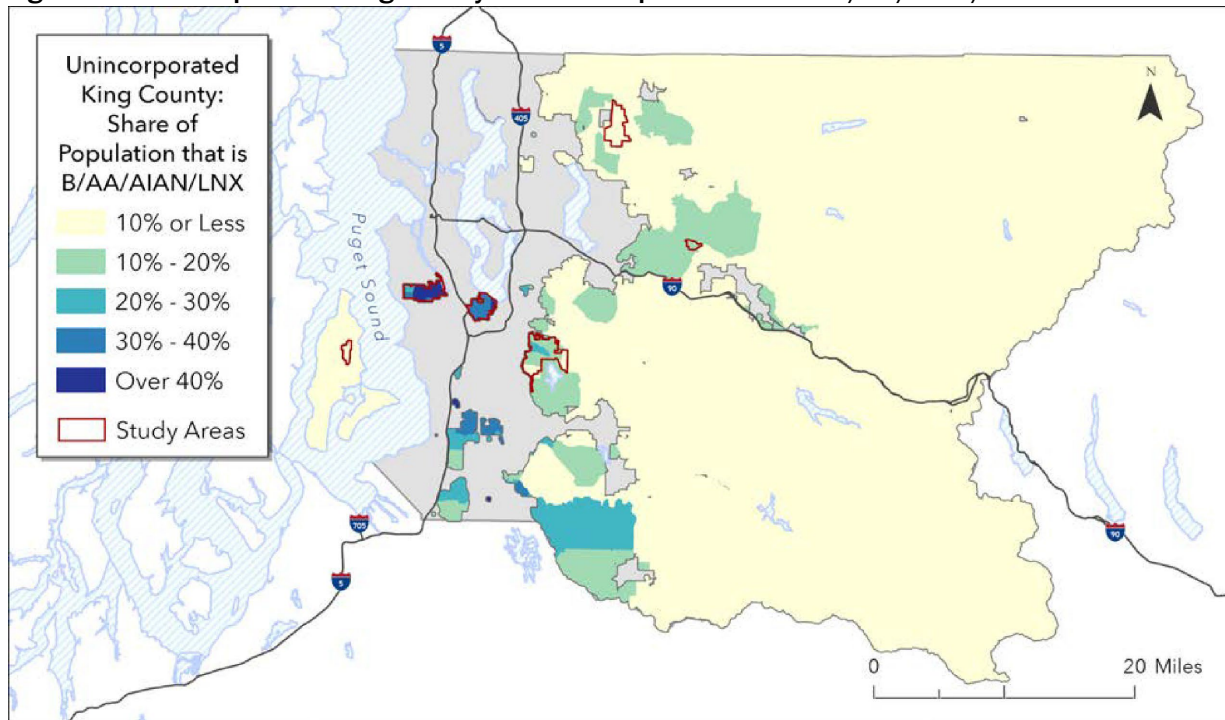
<sup>7</sup> University of California, Berkeley's Urban Displacement Project. <https://github.com/urban-displacement/displacement-typologies>

Figure 56: Unincorporated King County OESJ Composite Score



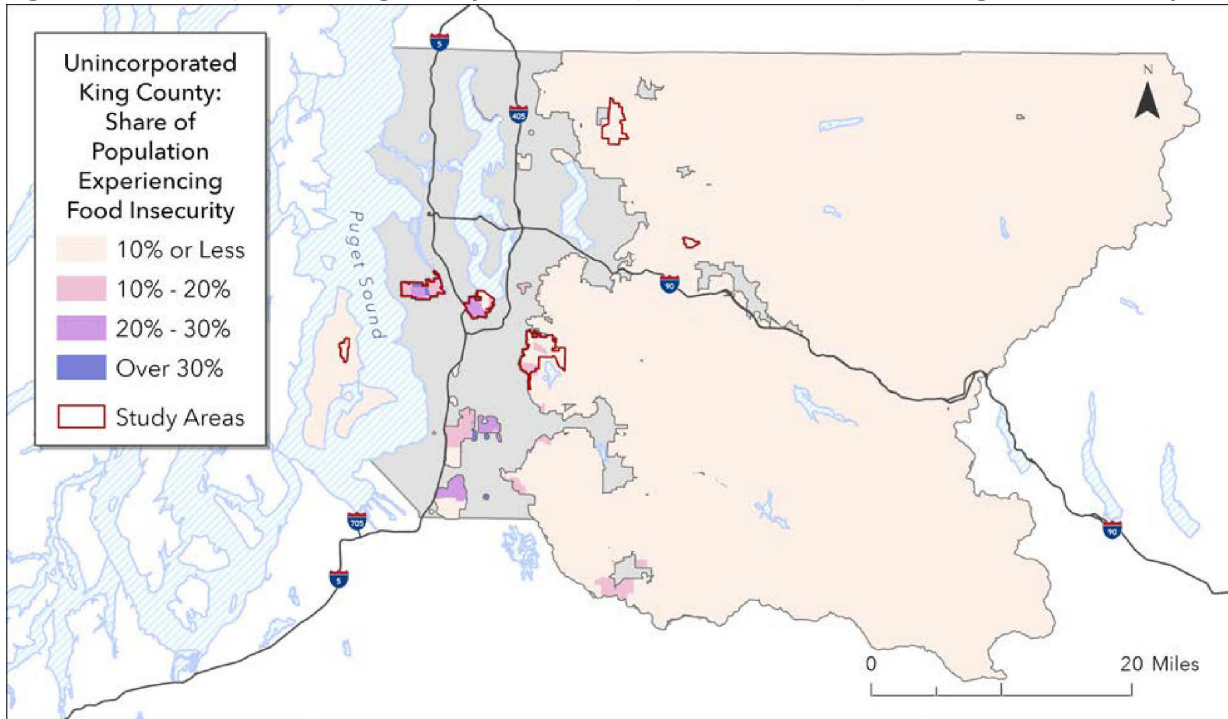
Source: ECONorthwest; ACS

Figure 57: Unincorporated King County Share of Population that is B/AA/AIAN/LNX



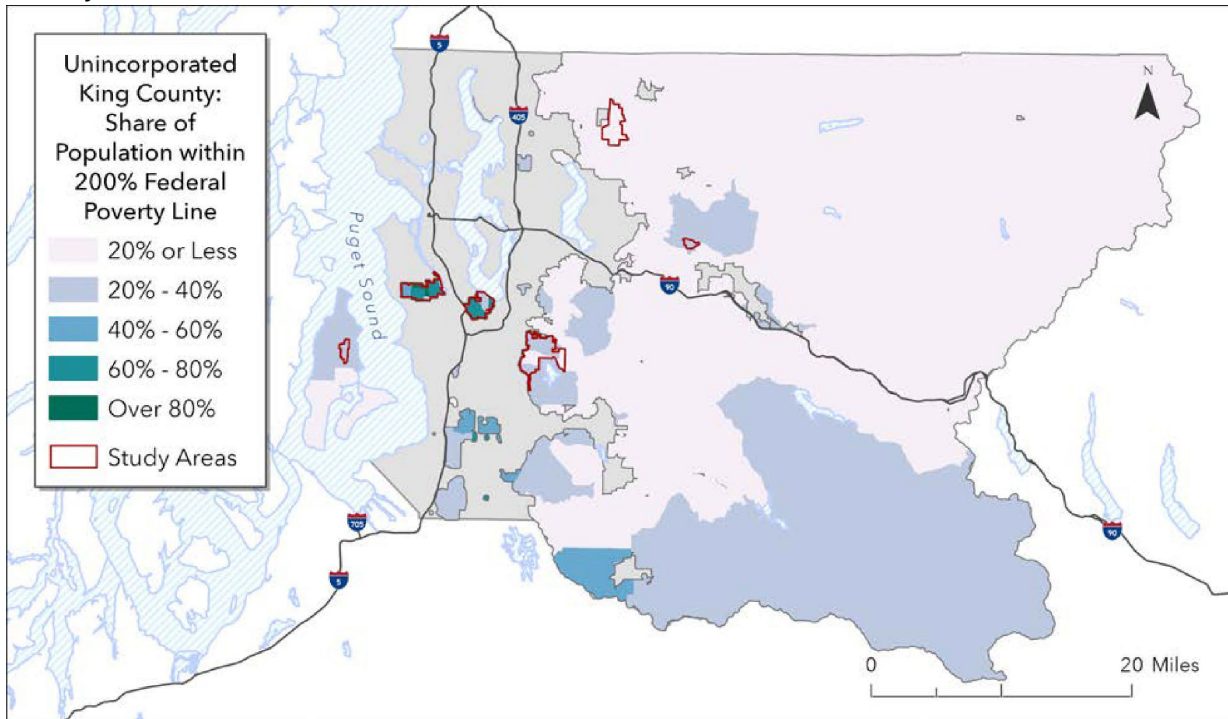
Source: ECONorthwest; ACS

**Figure 58: Unincorporated King County Share of Population that is Experiencing Food Insecurity**



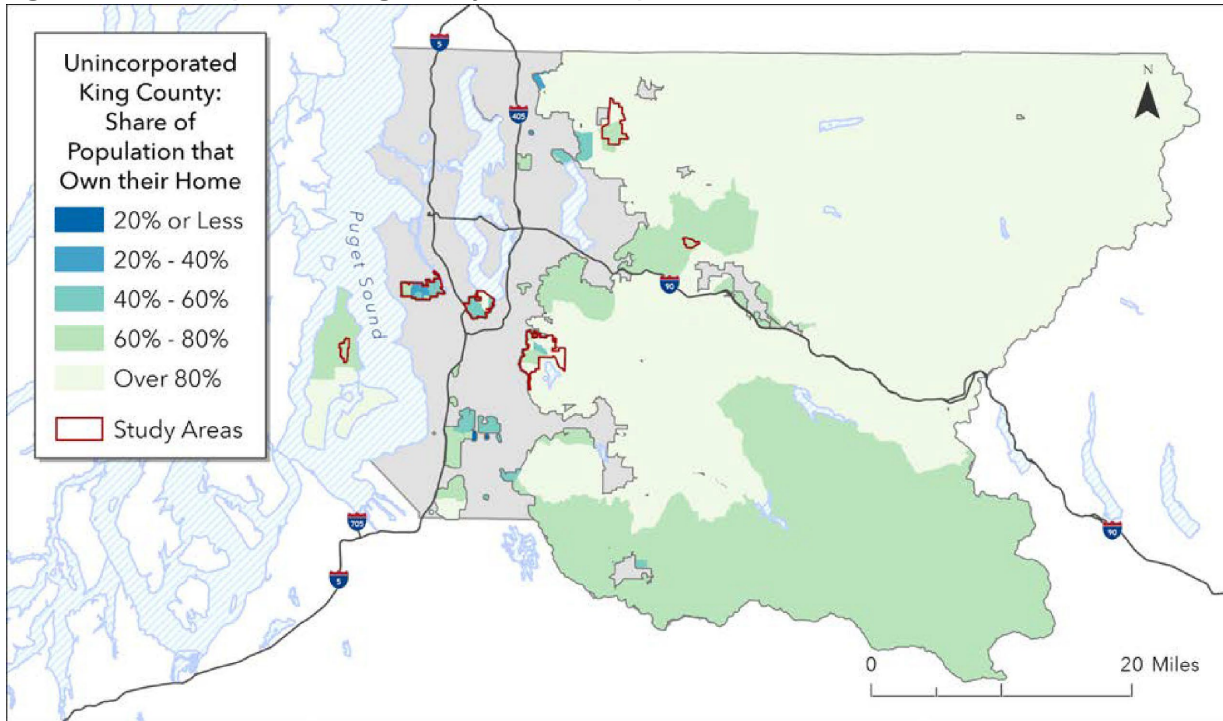
Source: ECONorthwest; ACS

**Figure 59: Unincorporated King County Share of Population that is Within 200% of the Federal Poverty Level**



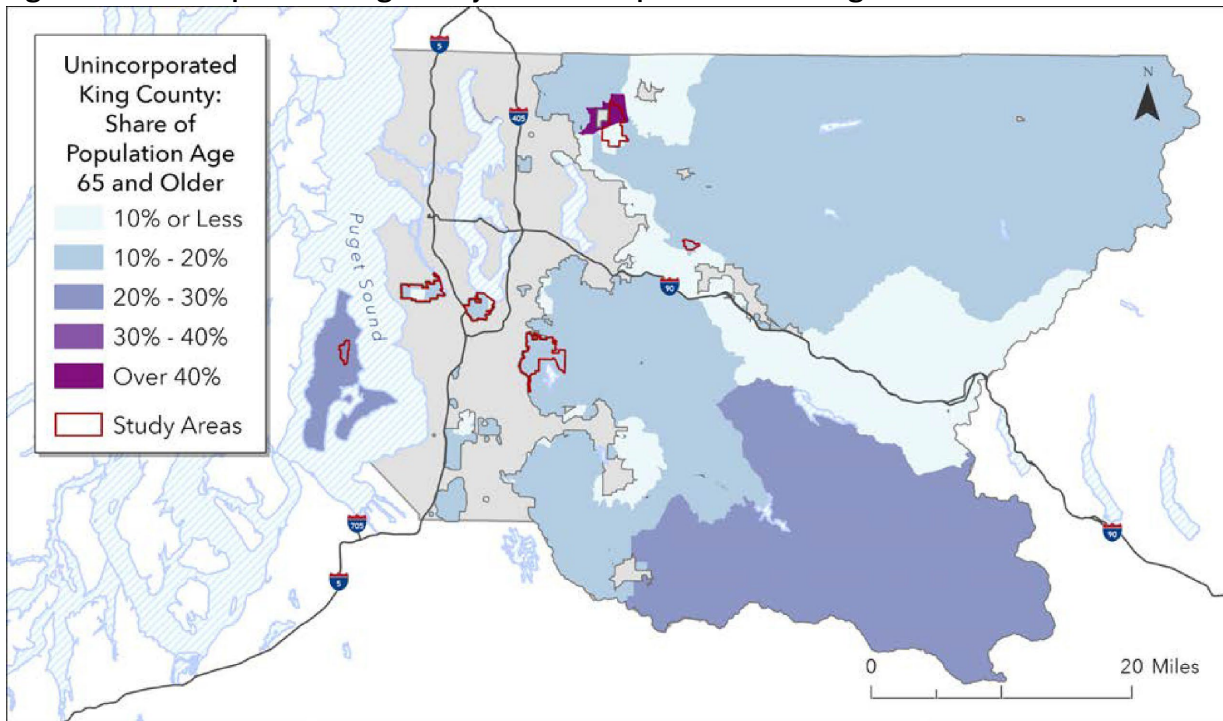
Source: ECONorthwest; ACS

**Figure 60: Unincorporated King County Share of Population that Owns Their Home**



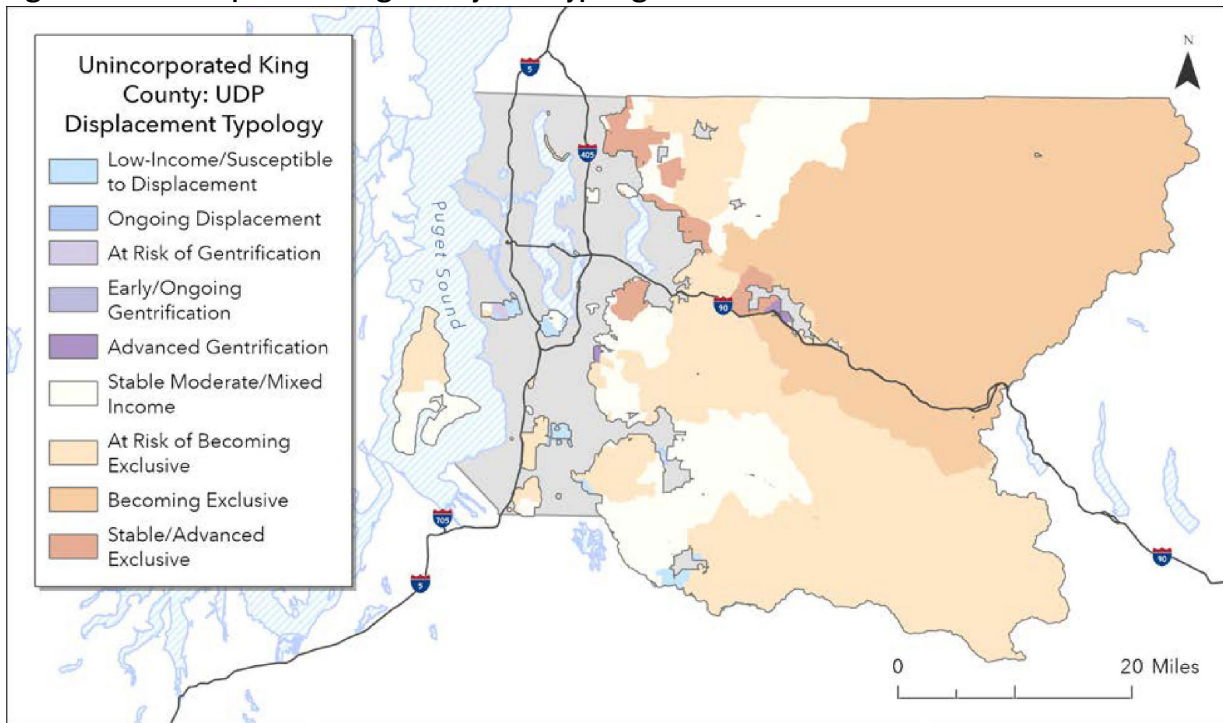
Source: ECONorthwest; ACS

**Figure 61: Unincorporated King County Share of Population that is Age 65 and Older**



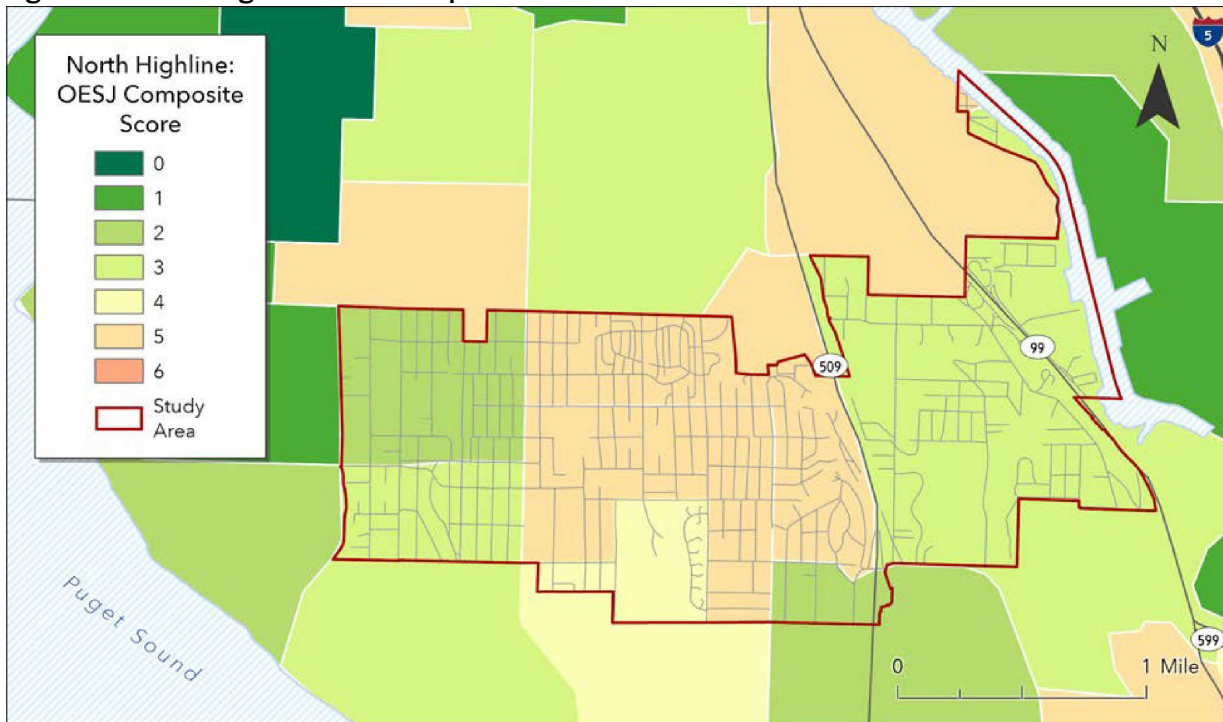
Source: ECONorthwest; ACS

Figure 62: Unincorporated King County UDP Typologies



Source: ECONorthwest; UDP

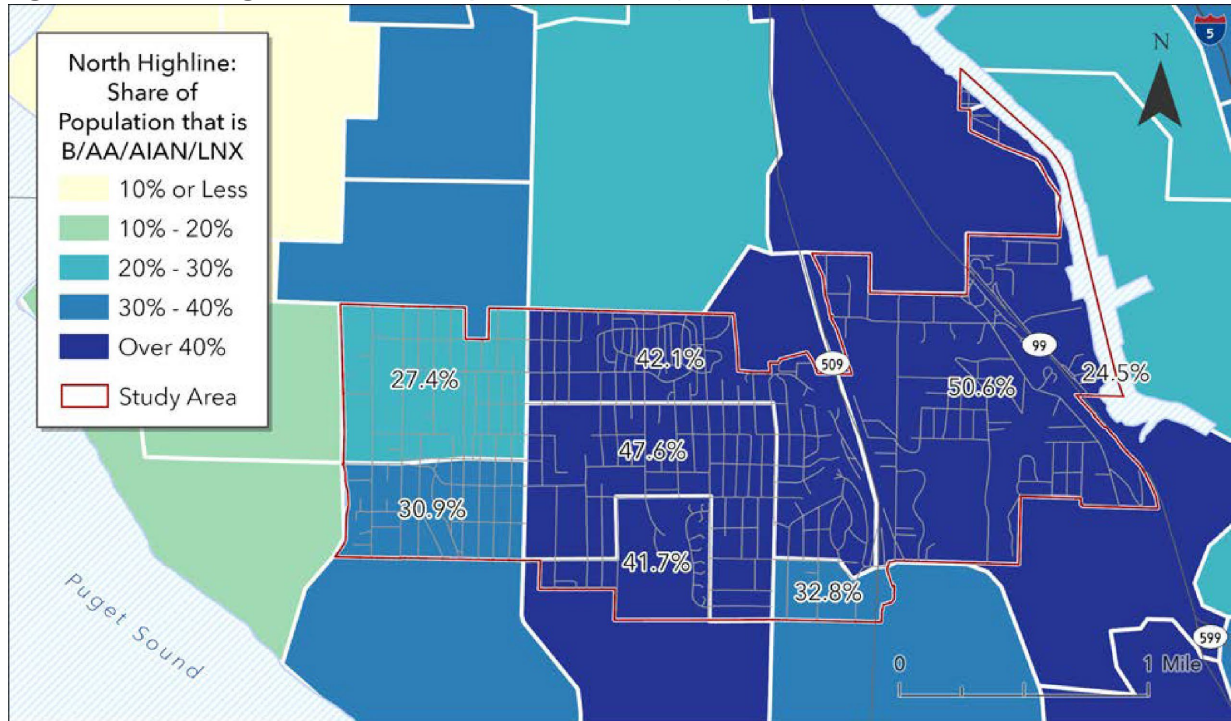
Figure 63: North Highline OESJ Composite Score



Source: ECONorthwest; ACS

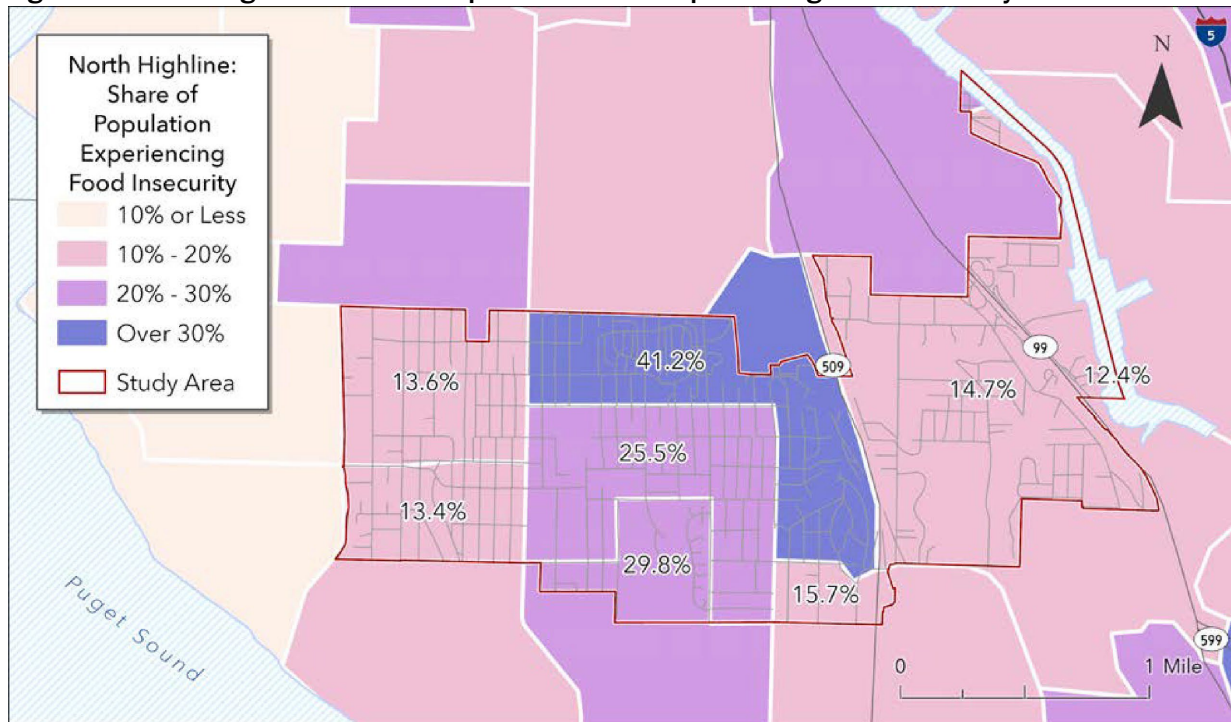


**Figure 64: North Highline Share of Population that is B/AA/AIAN/LNX**



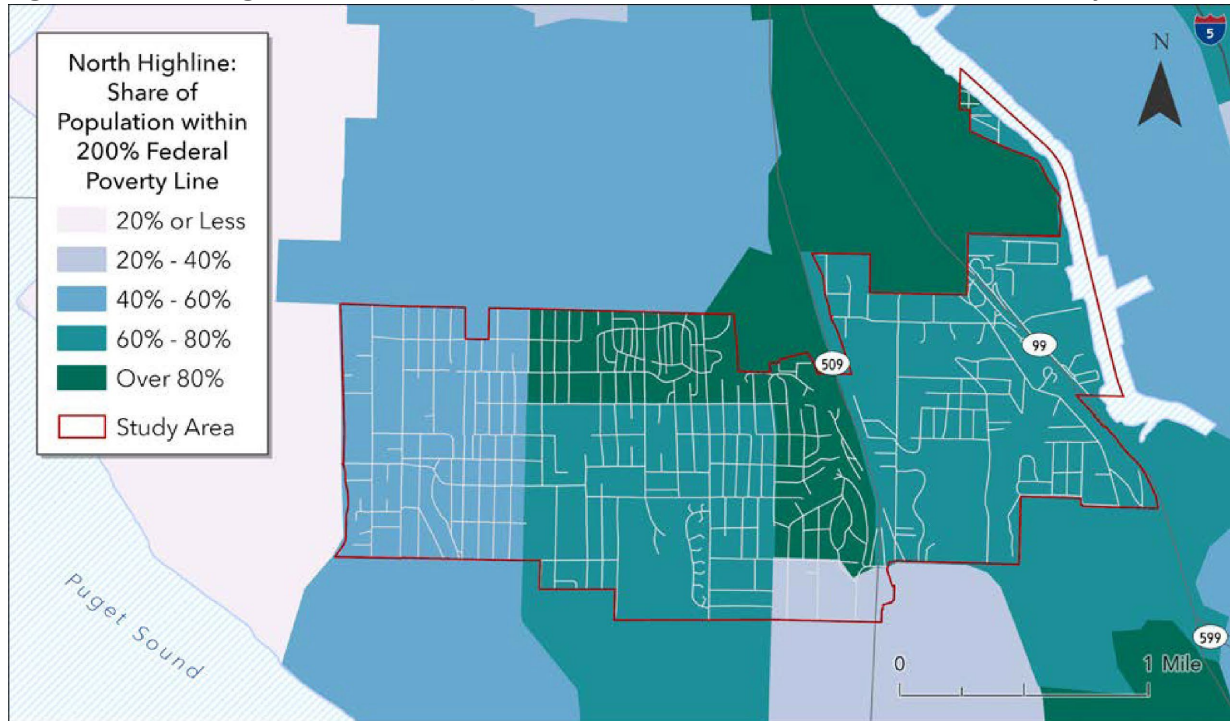
Source: ECONorthwest; ACS

**Figure 65: North Highline Share of Population that is Experiencing Food Insecurity**



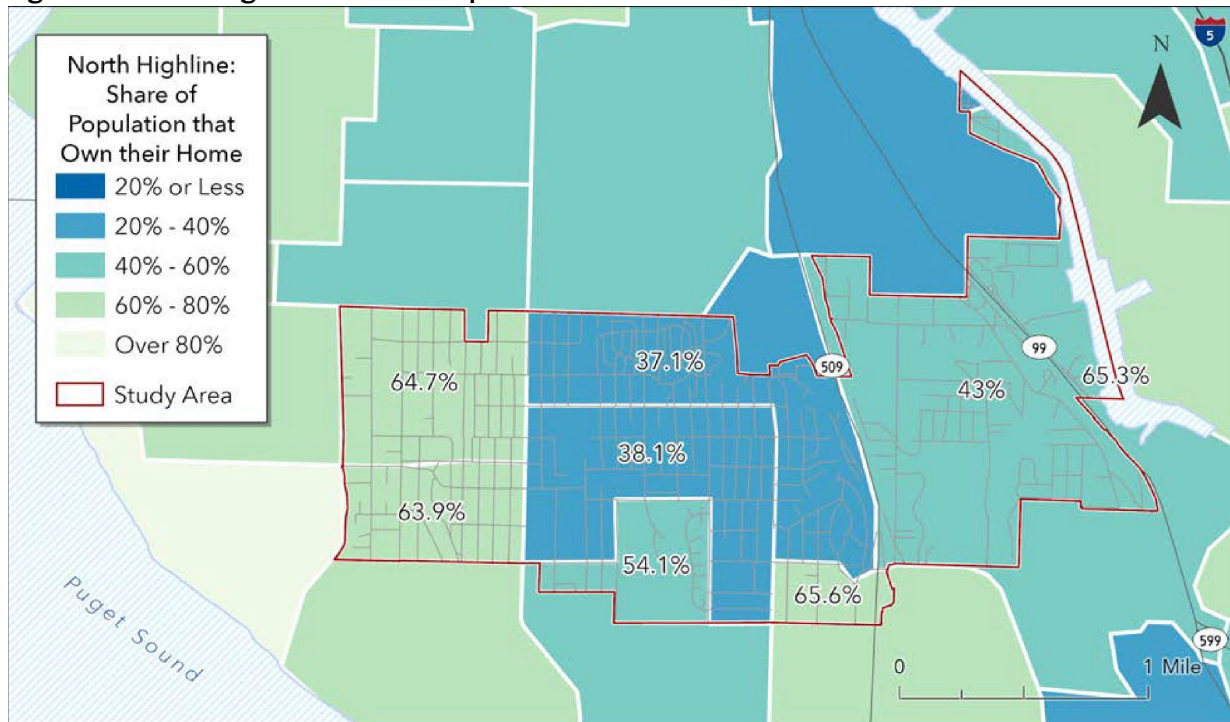
Source: ECONorthwest; ACS

**Figure 66: North Highline Share of Population that is Within 200% of the Federal Poverty Level**



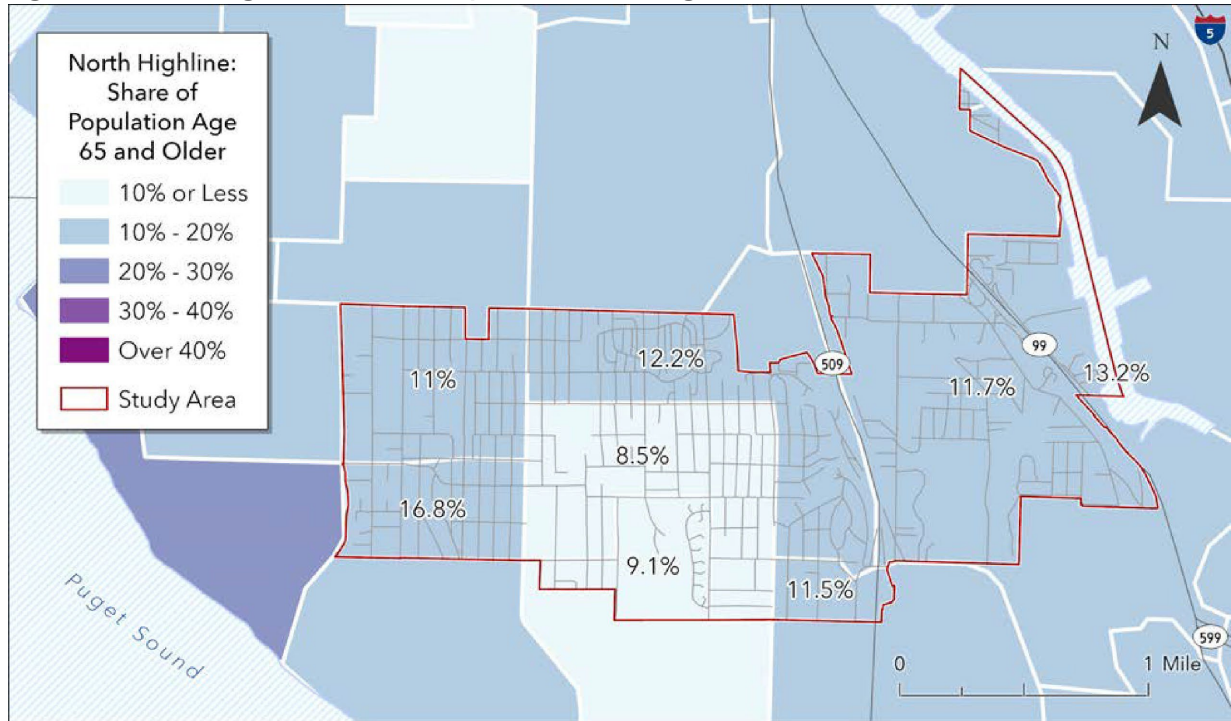
Source: ECONorthwest; ACS

**Figure 67: North Highline Share of Population that Owns Their Home**



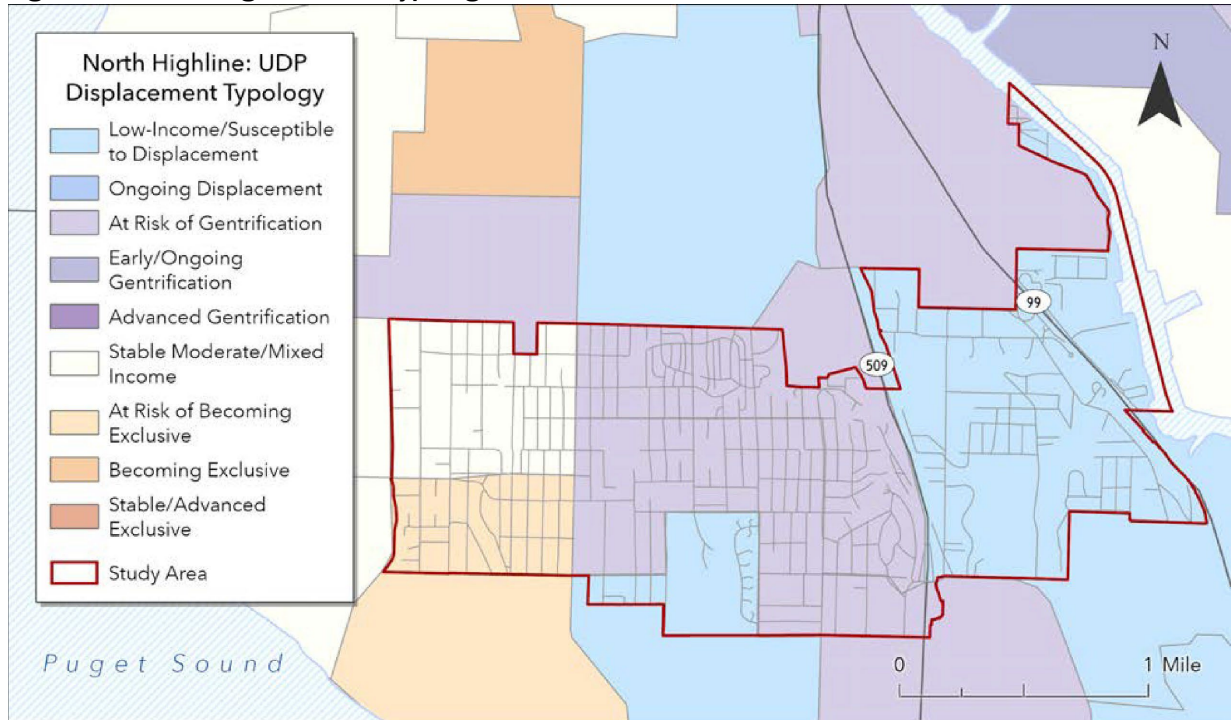
Source: ECONorthwest; ACS

**Figure 68: North Highline Share of Population that is Age 65 and Older**



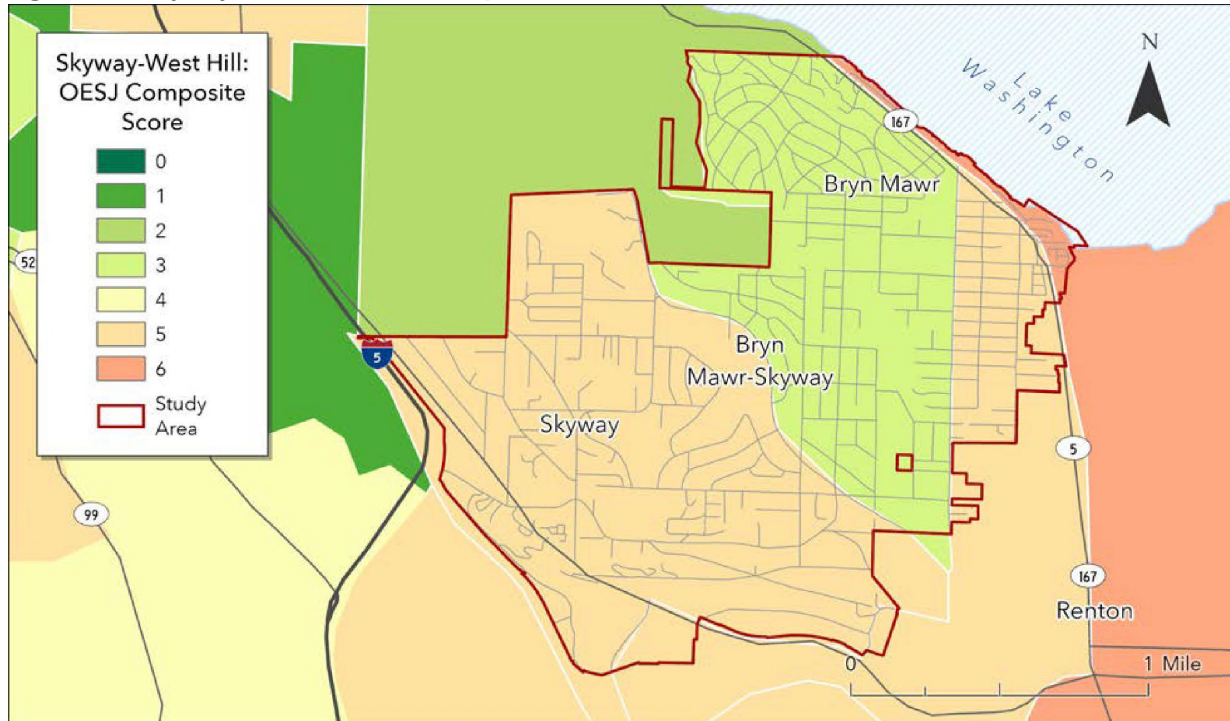
Source: ECONorthwest; ACS

**Figure 69: North Highline UDP Typologies**



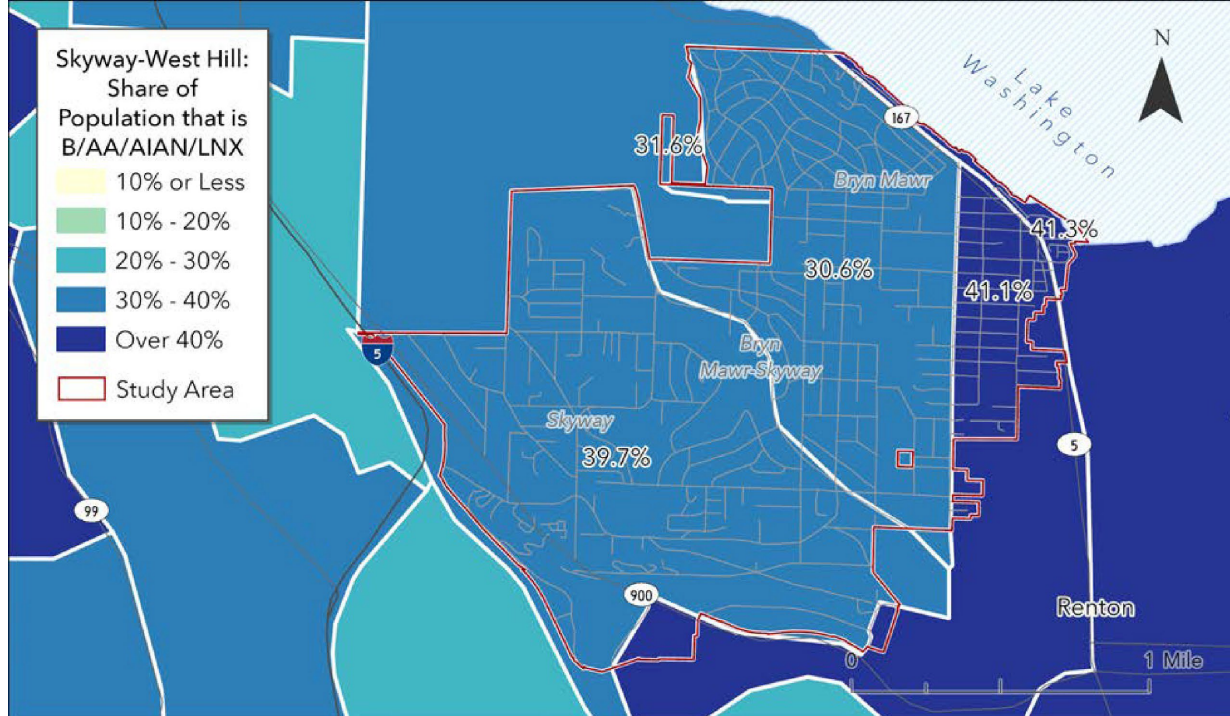
Source: ECONorthwest; UDP

**Figure 70: Skyway-West Hill OESJ Composite Score**



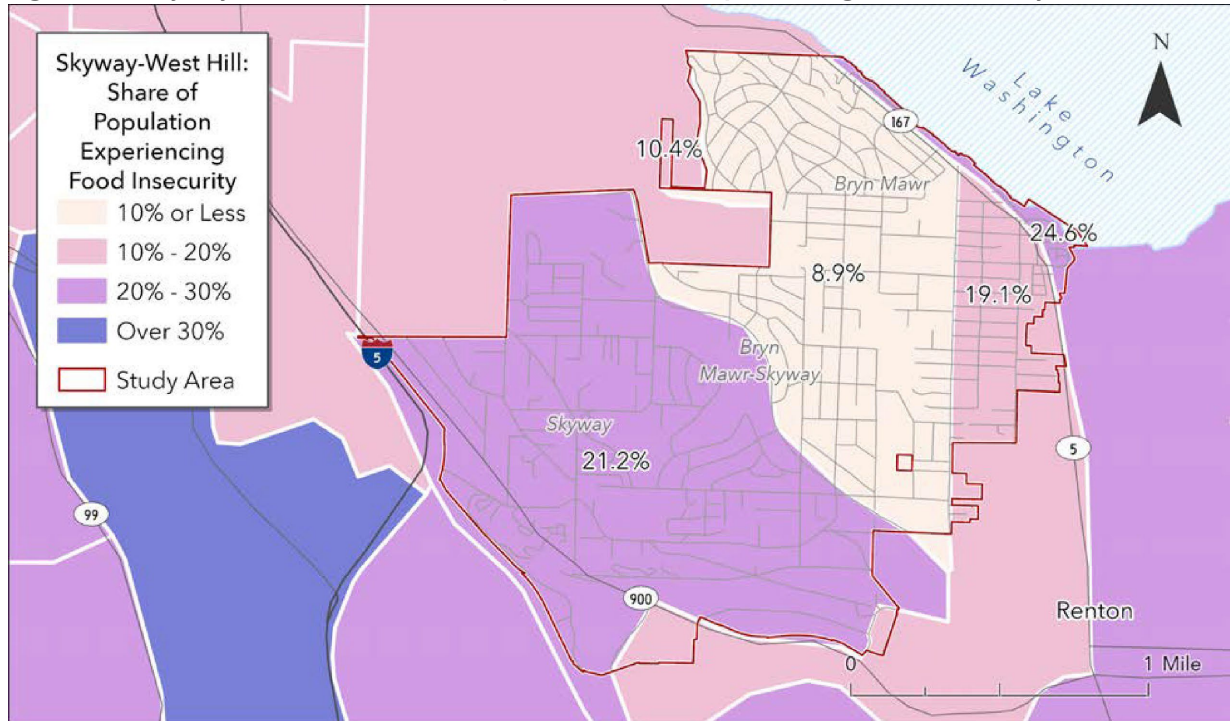
Source: ECONorthwest; ACS

**Figure 71: Skyway-West Hill Share of Population that is B/AA/AIAN/LNX**



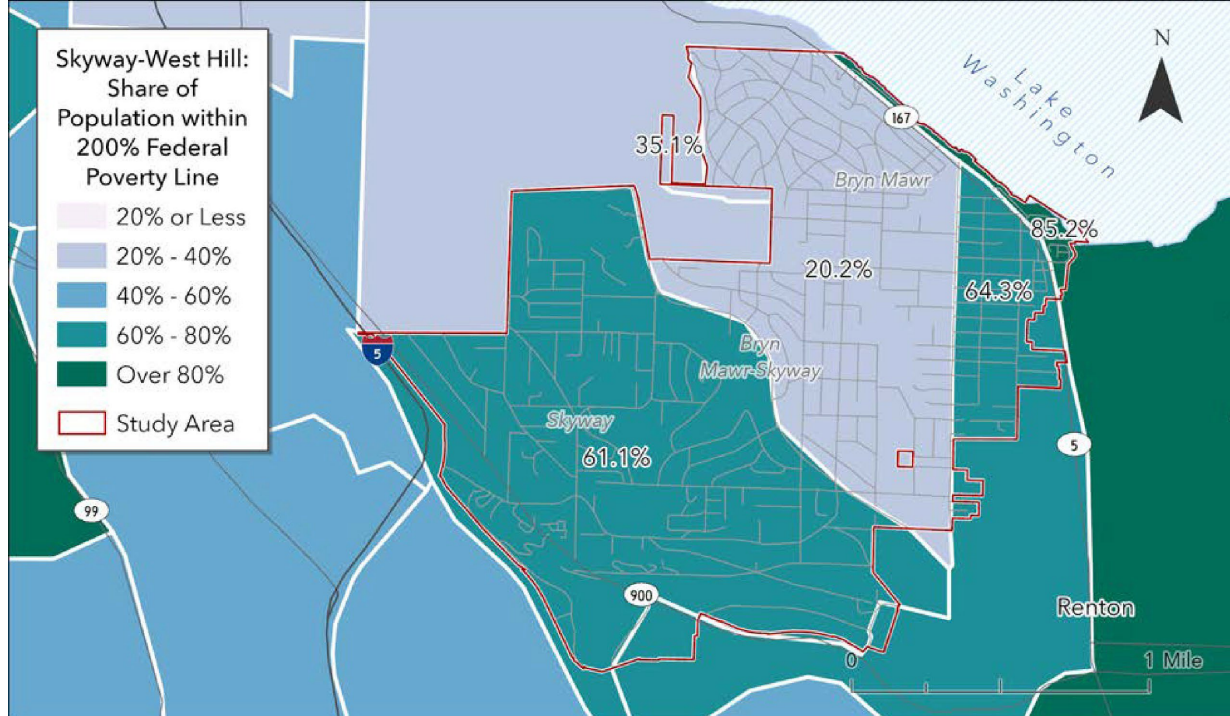
Source: ECONorthwest; ACS

**Figure 72: Skyway-West Hill Share of Population that is Experiencing Food Insecurity**



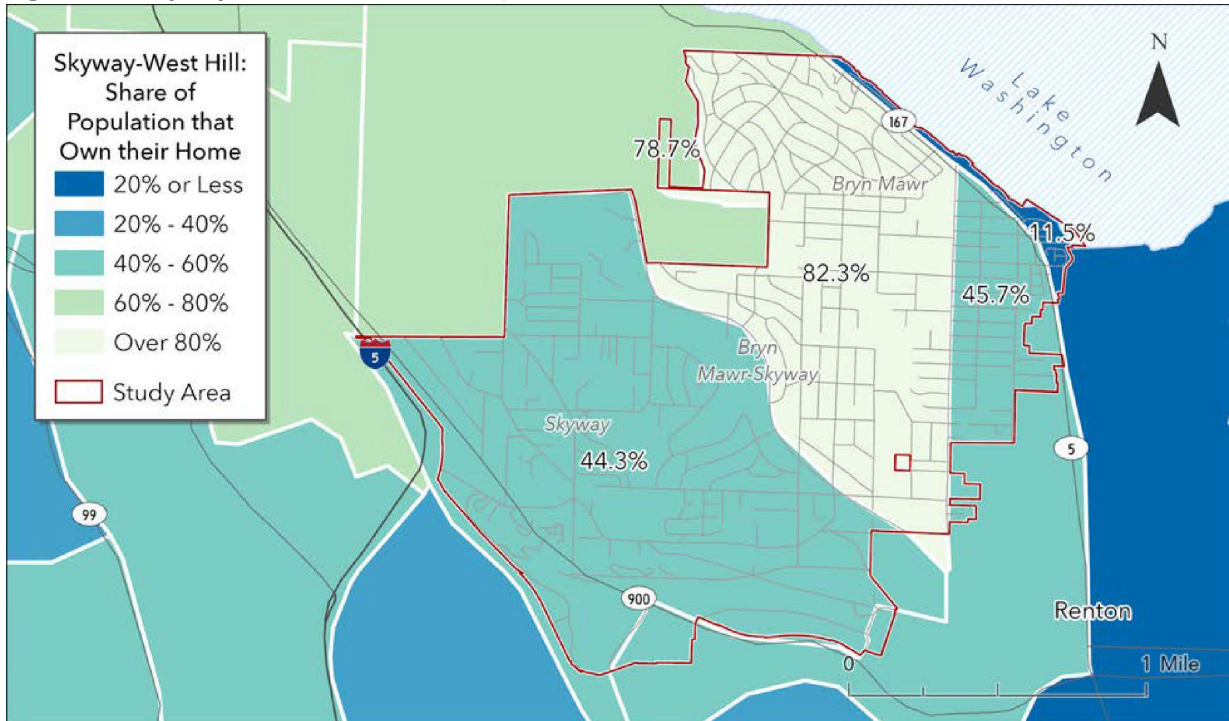
Source: ECONorthwest; ACS

**Figure 73: Skyway-West Hill Share of Population that is Within 200% of the Federal Poverty Level**



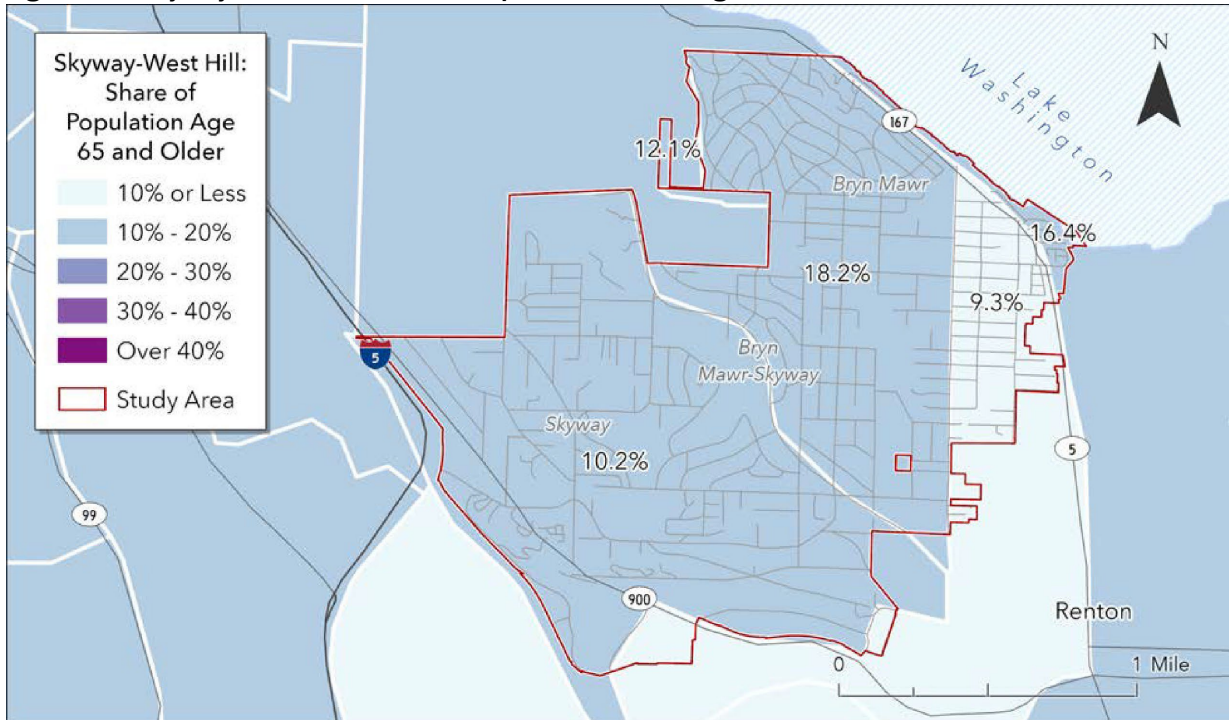
Source: ECONorthwest; ACS

**Figure 74: Skyway-West Hill Share of Population that Owns Their Home**



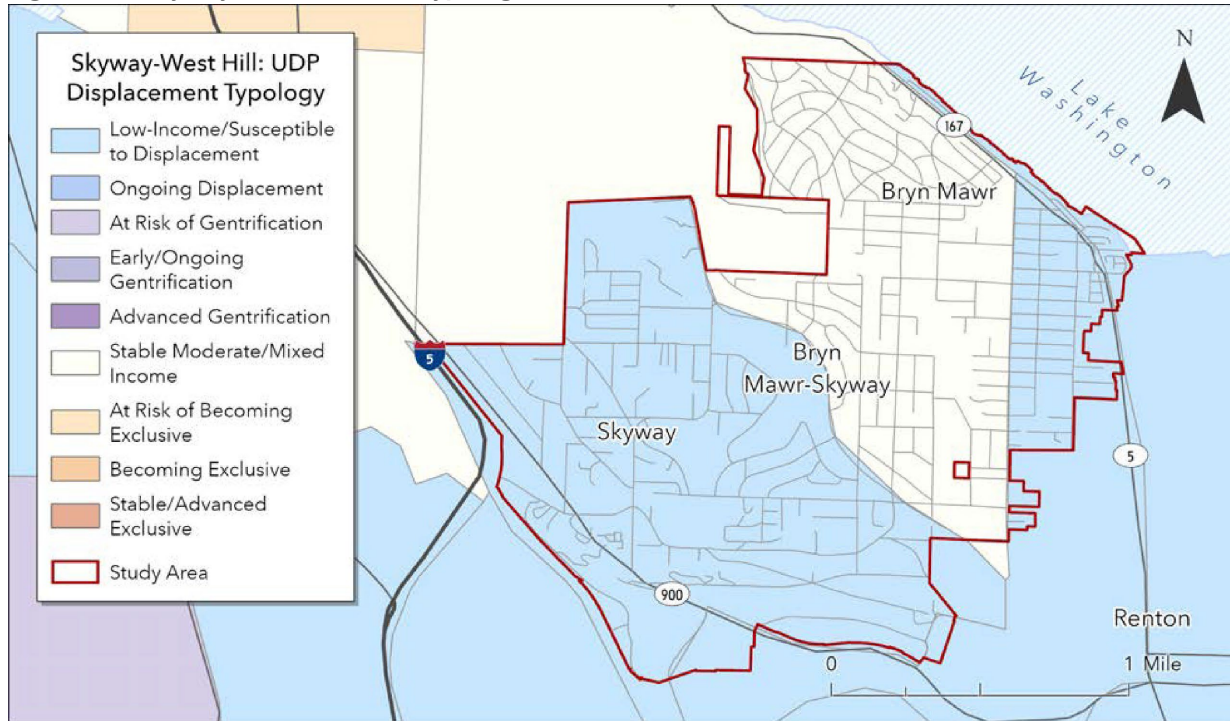
Source: ECONorthwest; ACS

**Figure 75: Skyway-West Hill Share of Population that is Age 65 and Older**



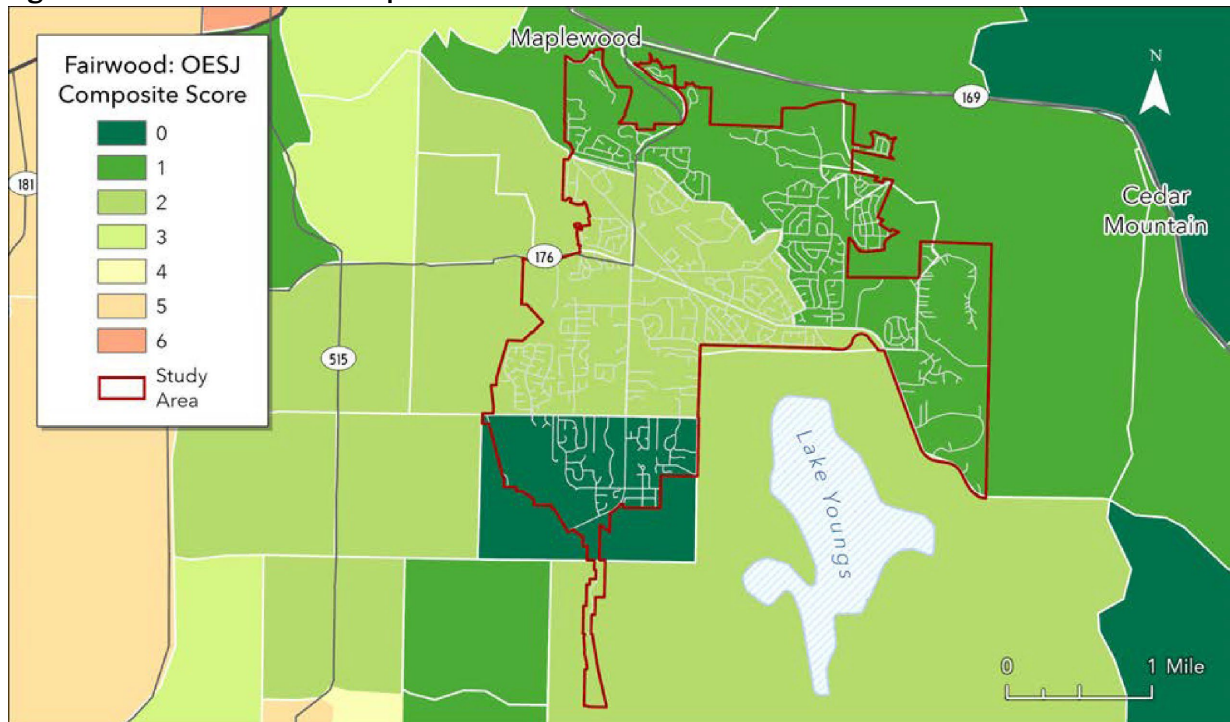
Source: ECONorthwest; ACS

Figure 76: Skyway-West Hill UDP Typologies



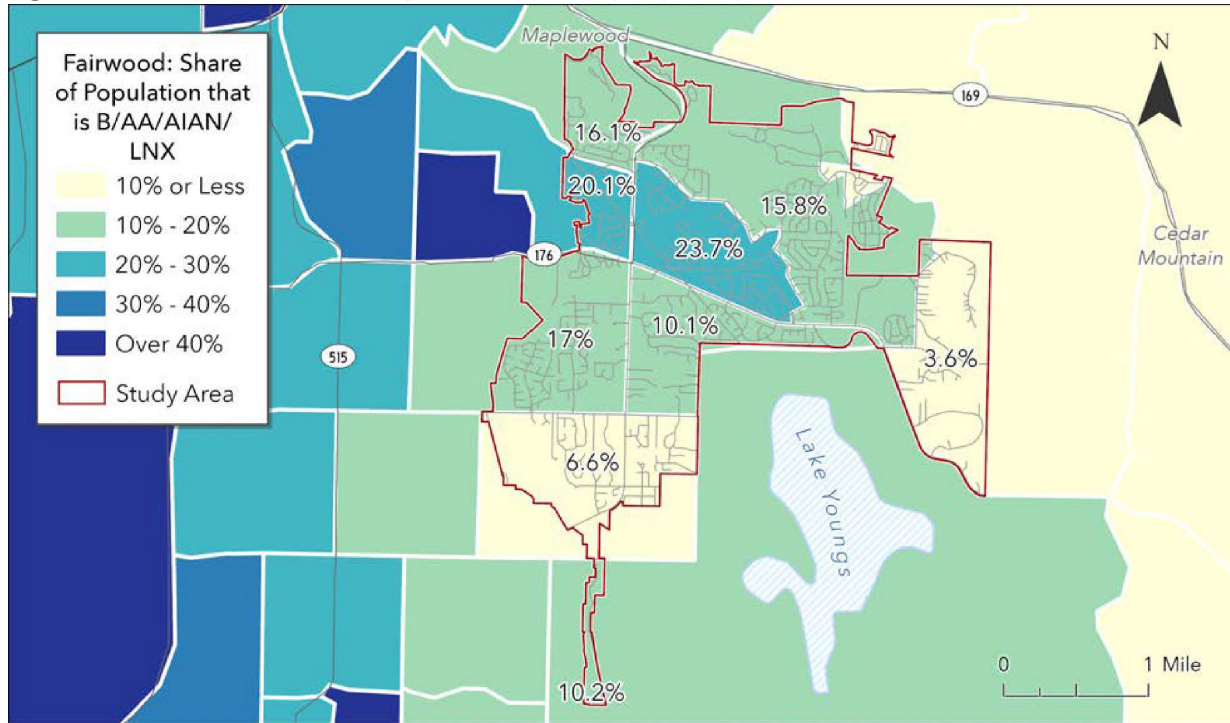
Source: ECONorthwest; UDP

Figure 77: Fairwood OESJ Composite Score



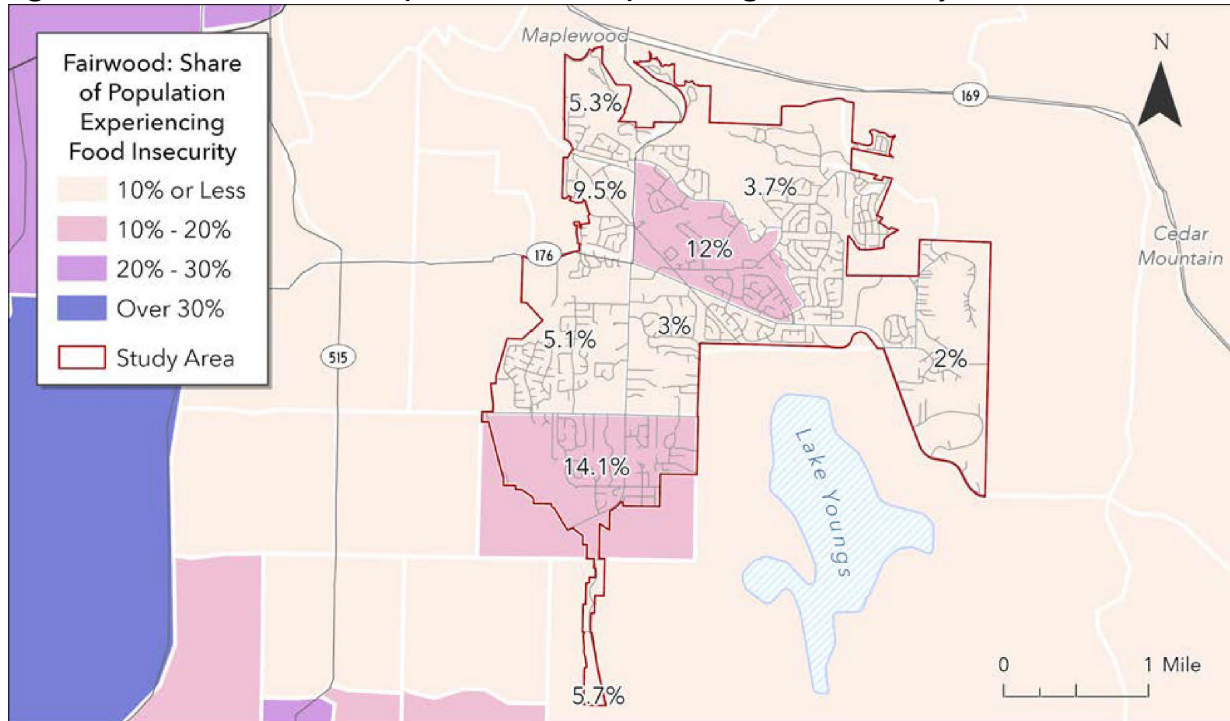
Source: ECONorthwest; ACS

**Figure 78: Fairwood Share of Population that is B/AA/AIAN/LNX**



Source: ECONorthwest; ACS

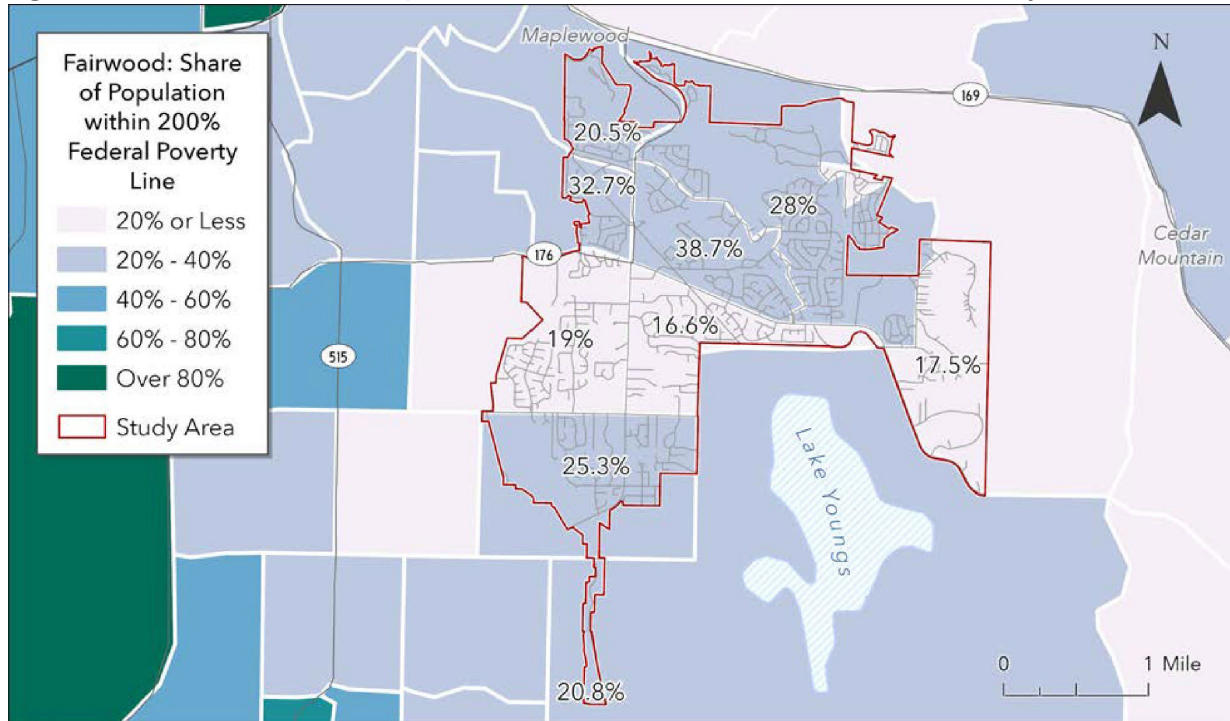
**Figure 79: Fairwood Share of Population that is Experiencing Food Insecurity**



Source: ECONorthwest; ACS

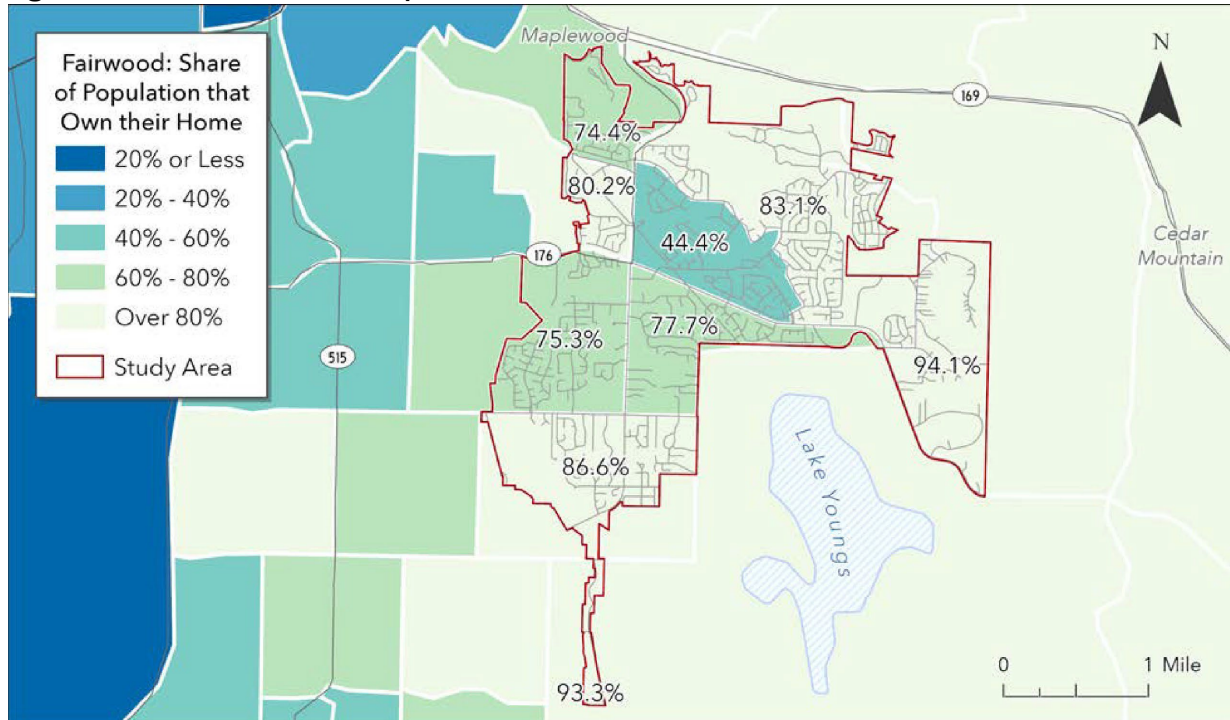


**Figure 80: Fairwood Share of Population that is Within 200% of the Federal Poverty Level**



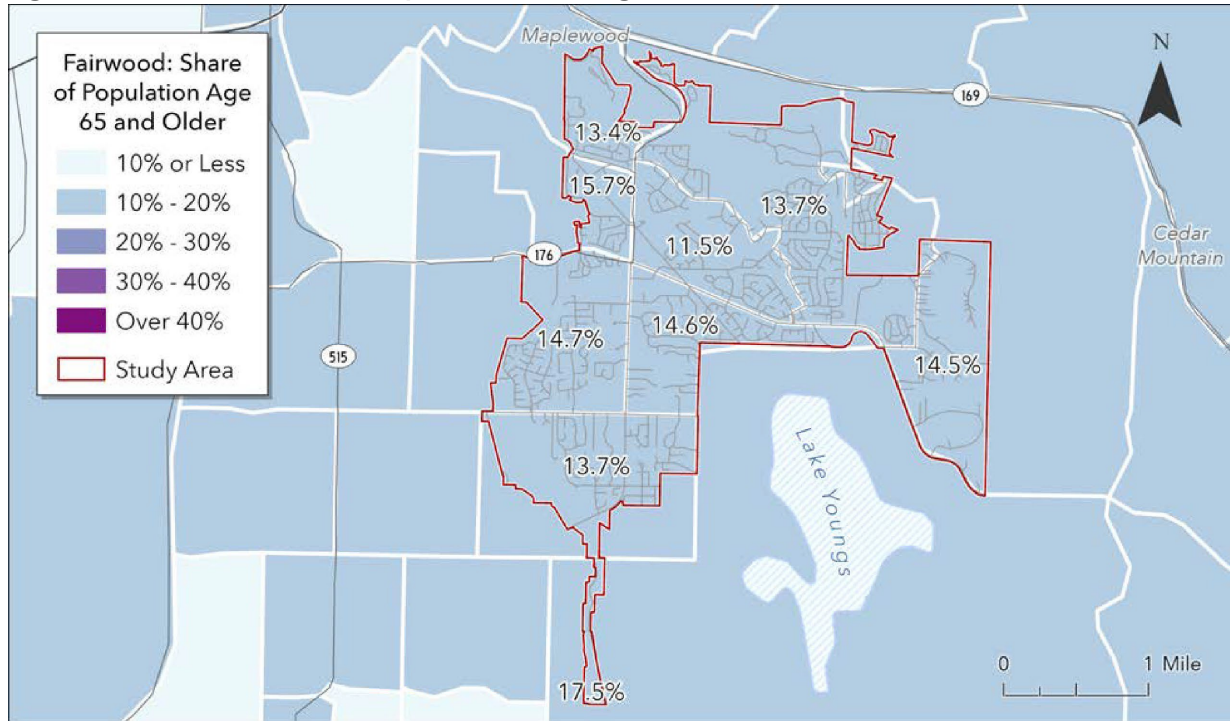
Source: ECONorthwest; ACS

**Figure 81: Fairwood Share of Population that Owns Their Home**



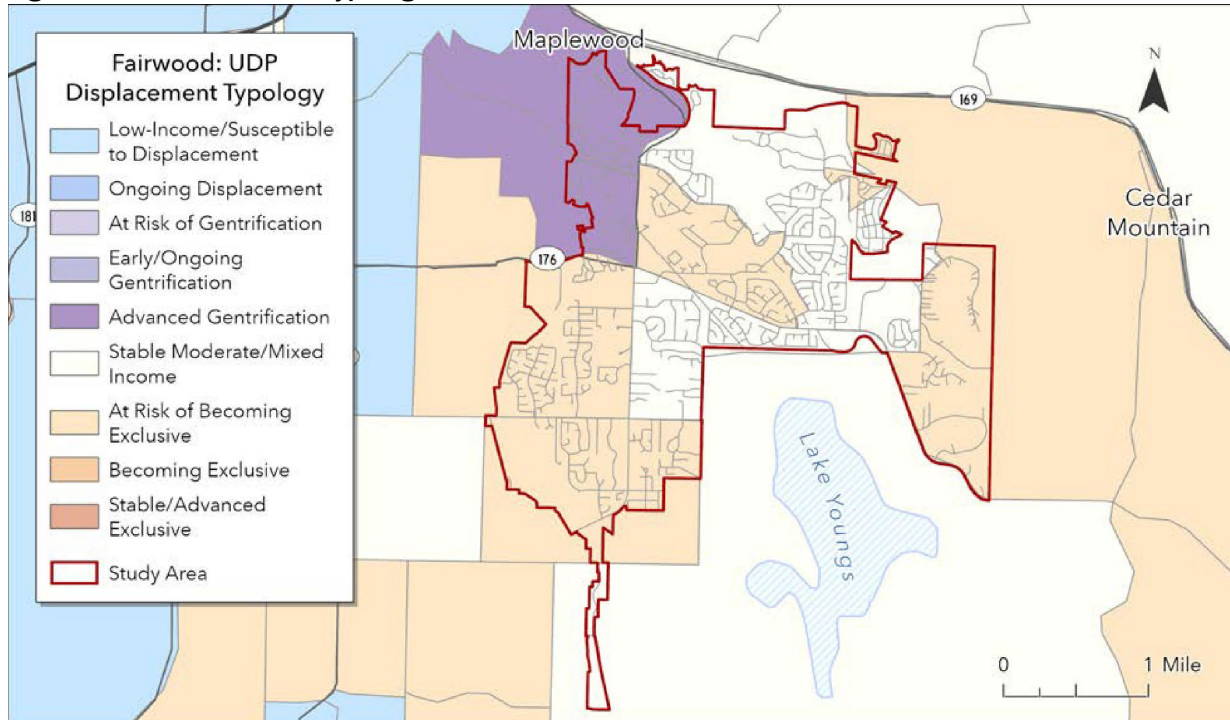
Source: ECONorthwest; ACS

**Figure 82: Fairwood Share of Population that is Age 65 and Older**



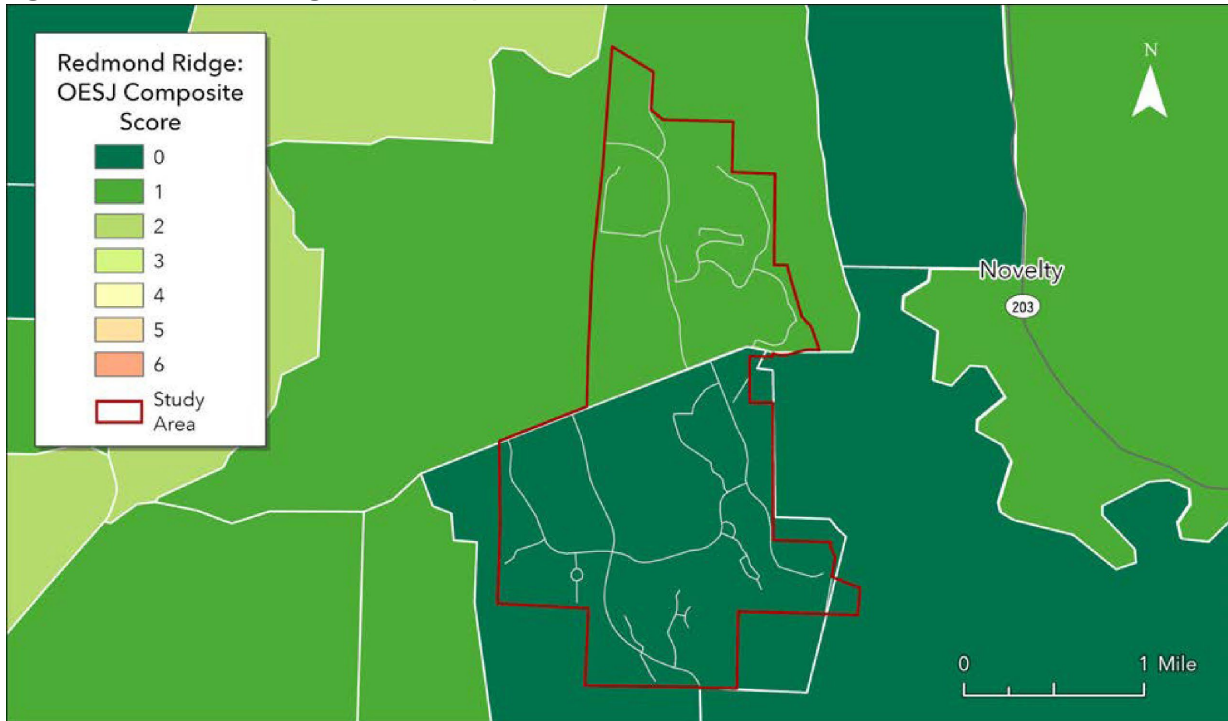
Source: ECONorthwest; ACS

**Figure 83: Fairwood UDP Typologies**



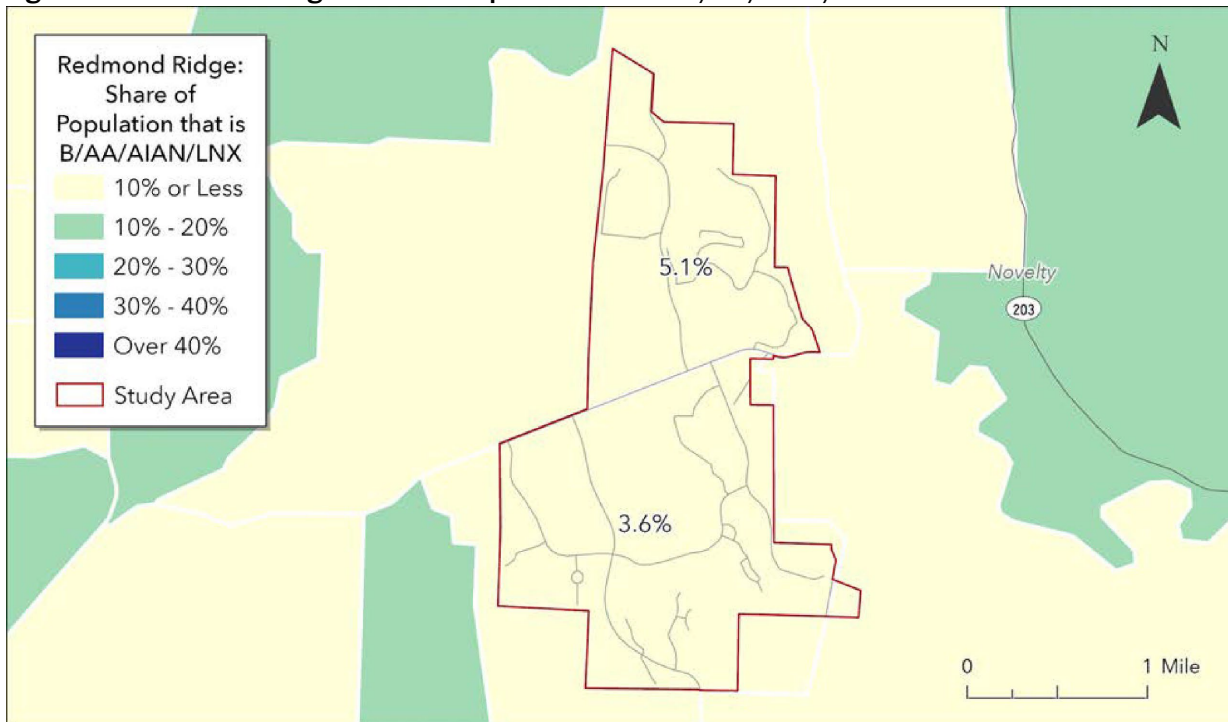
Source: ECONorthwest; UDP

Figure 84: Redmond Ridge OESJ Composite Score



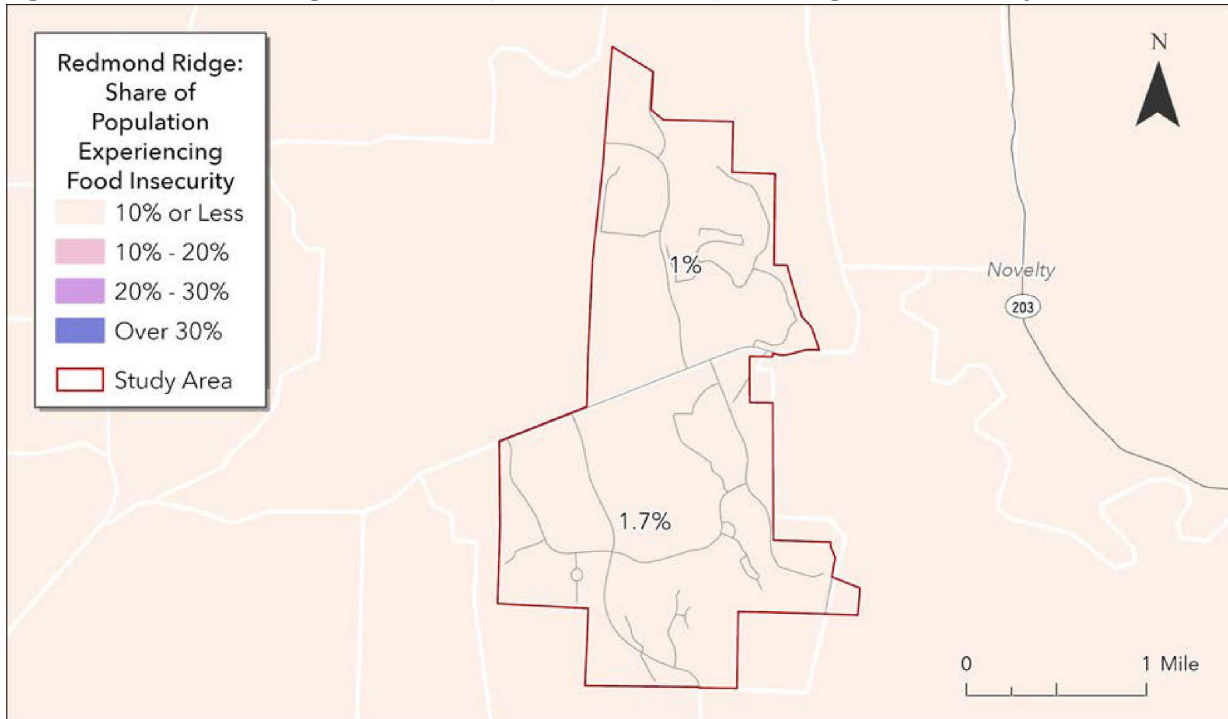
Source: ECONorthwest; ACS

Figure 85: Redmond Ridge Share of Population that is B/AA/AIAN/LNX



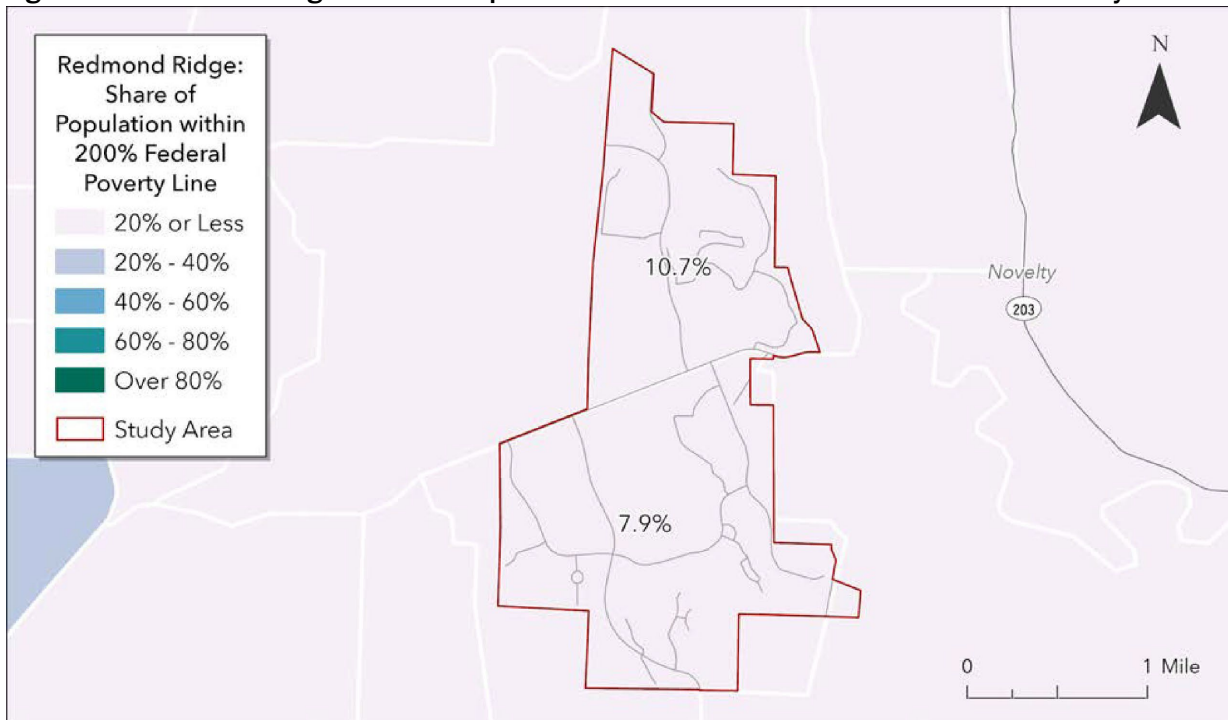
Source: ECONorthwest; ACS

**Figure 86: Redmond Ridge Share of Population that is Experiencing Food Insecurity**



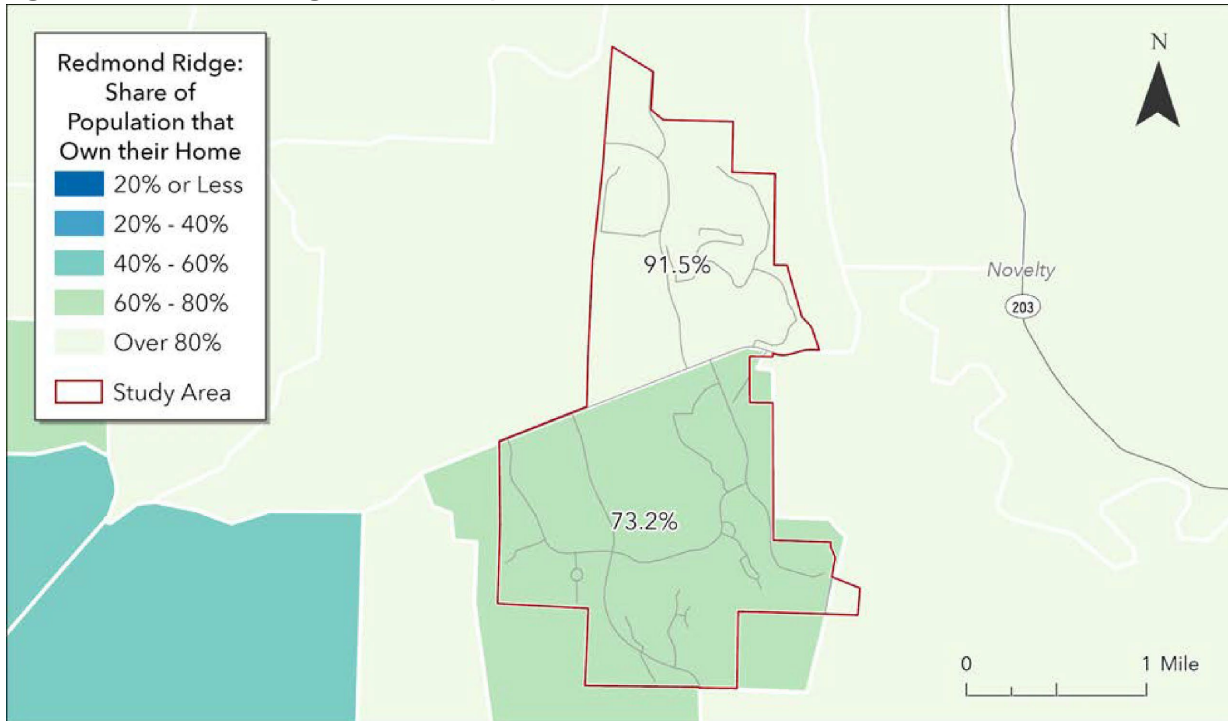
Source: ECONorthwest; ACS

**Figure 87: Redmond Ridge Share of Population that is Within 200% of the Federal Poverty Level**



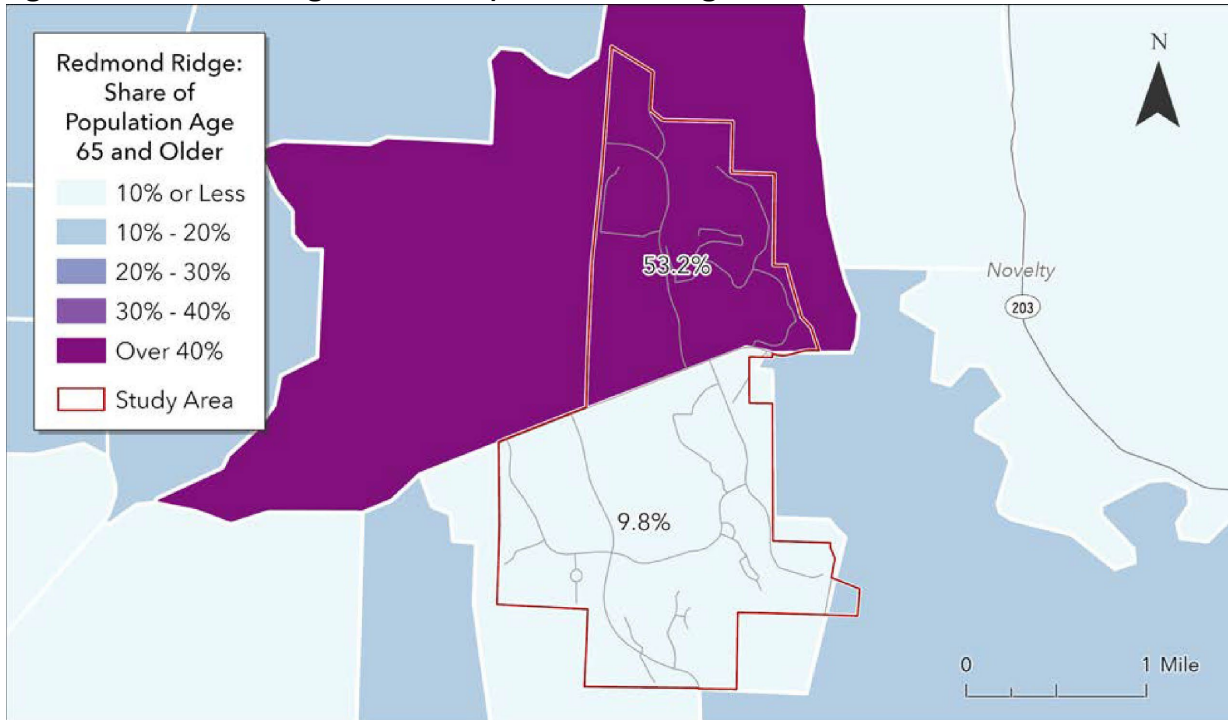
Source: ECONorthwest; ACS

Figure 88: Redmond Ridge Share of Population that Owns Their Home



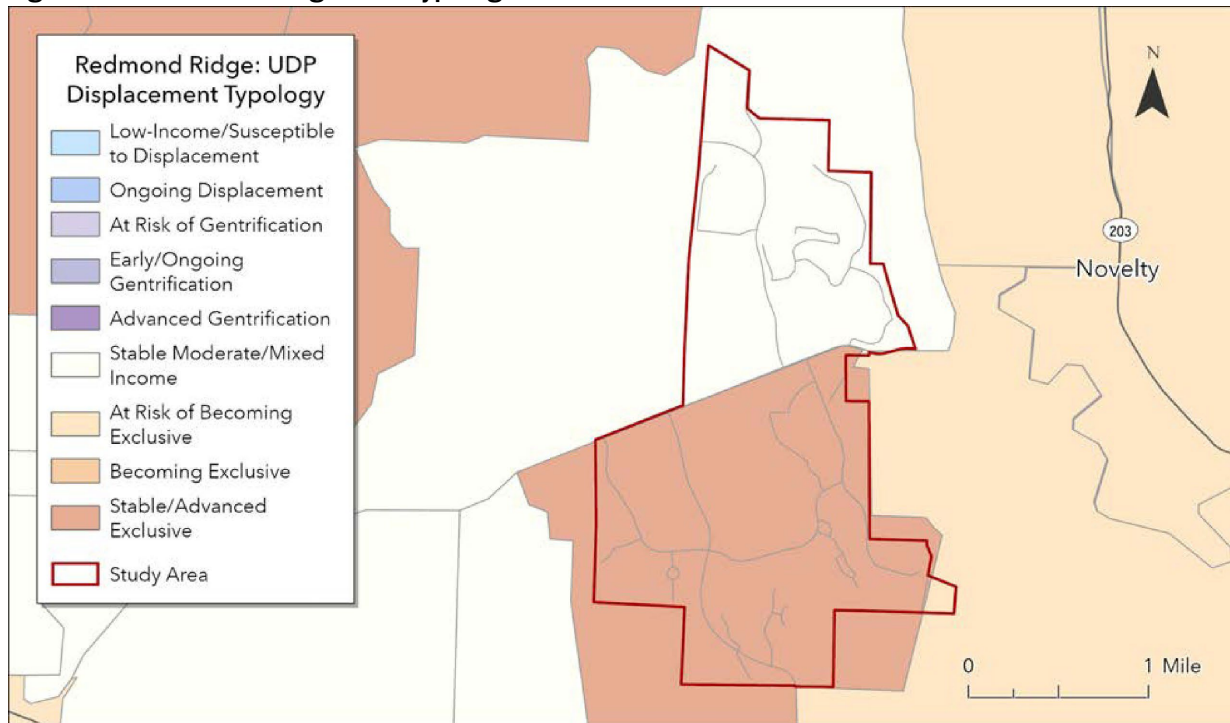
Source: ECONorthwest; ACS

Figure 89: Redmond Ridge Share of Population that is Age 65 and Older



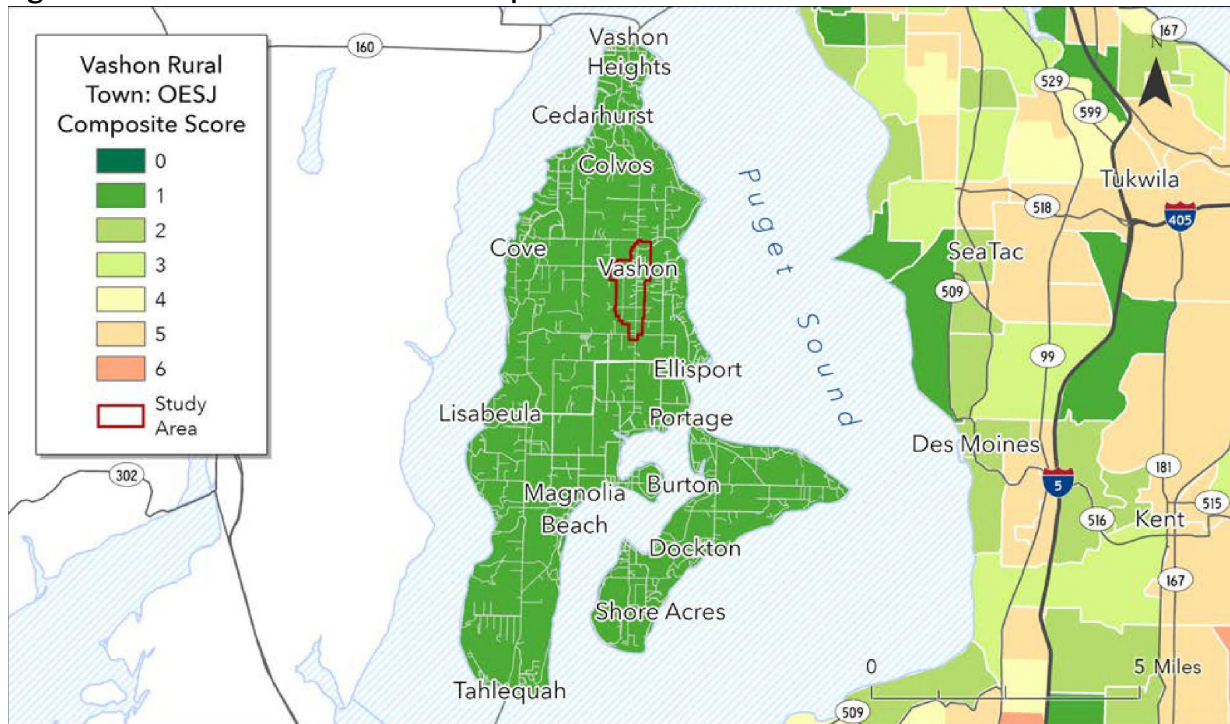
Source: ECONorthwest; ACS

**Figure 90: Redmond Ridge UDP Typologies**



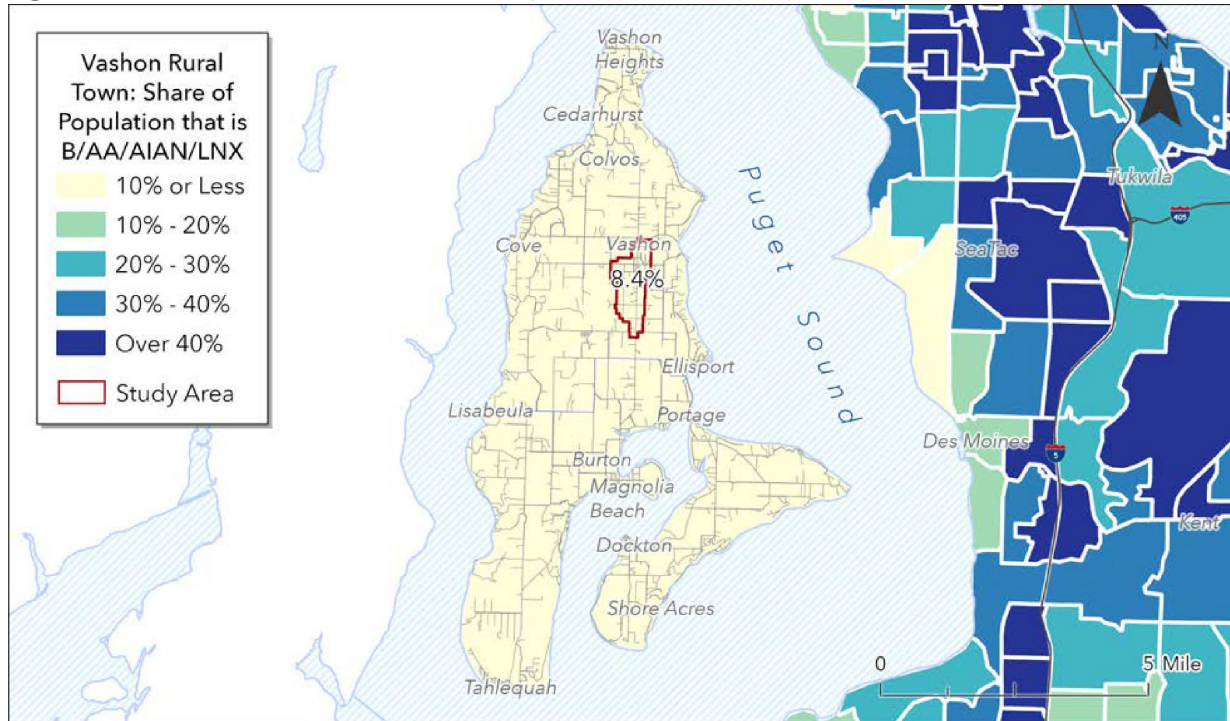
Source: ECONorthwest; UDP

**Figure 91: Vashon Rural Town OESJ Composite Score**



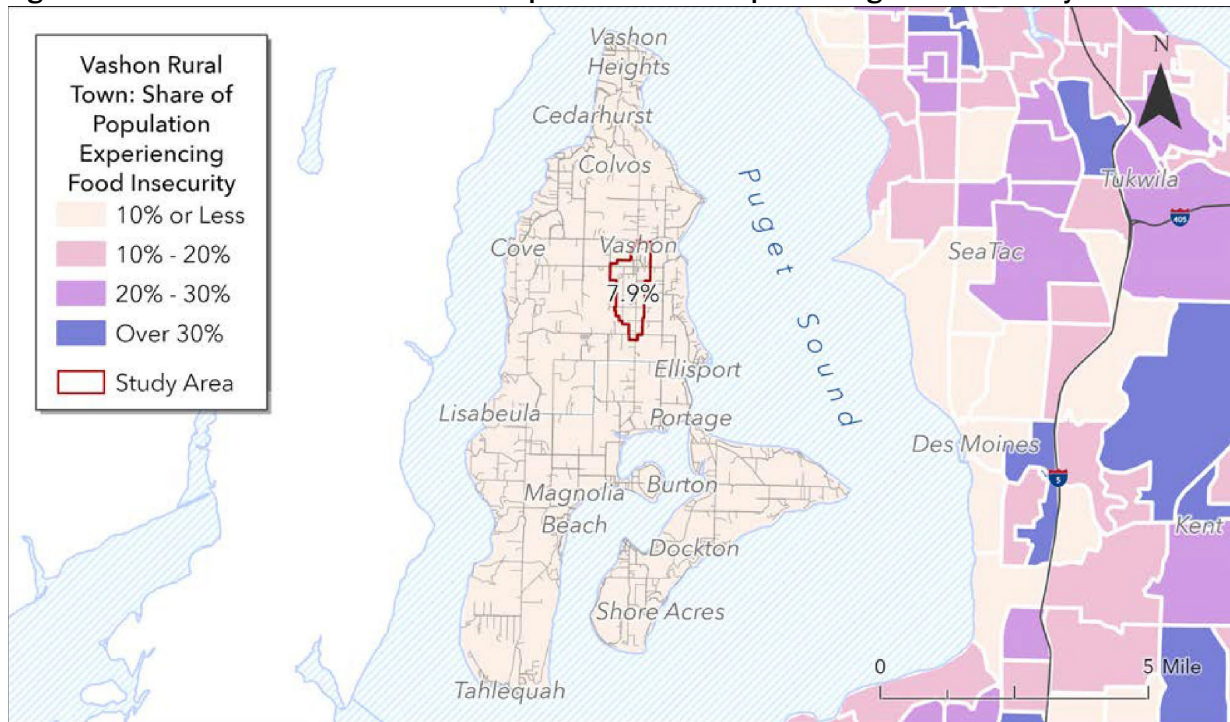
Source: ECONorthwest; ACS

Figure 92: Vashon Rural Town Share of Population that is B/AA/AIAN/LNX



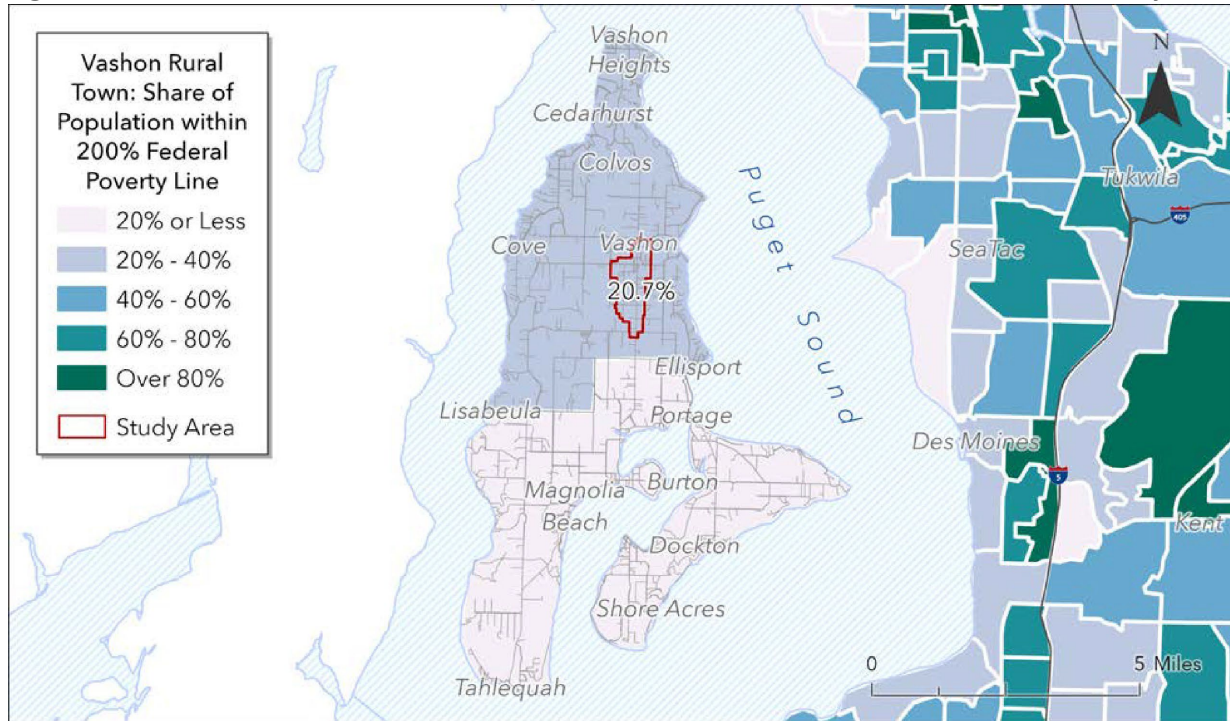
Source: ECONorthwest; ACS

Figure 93: Vashon Rural Town Share of Population that is Experiencing Food Insecurity



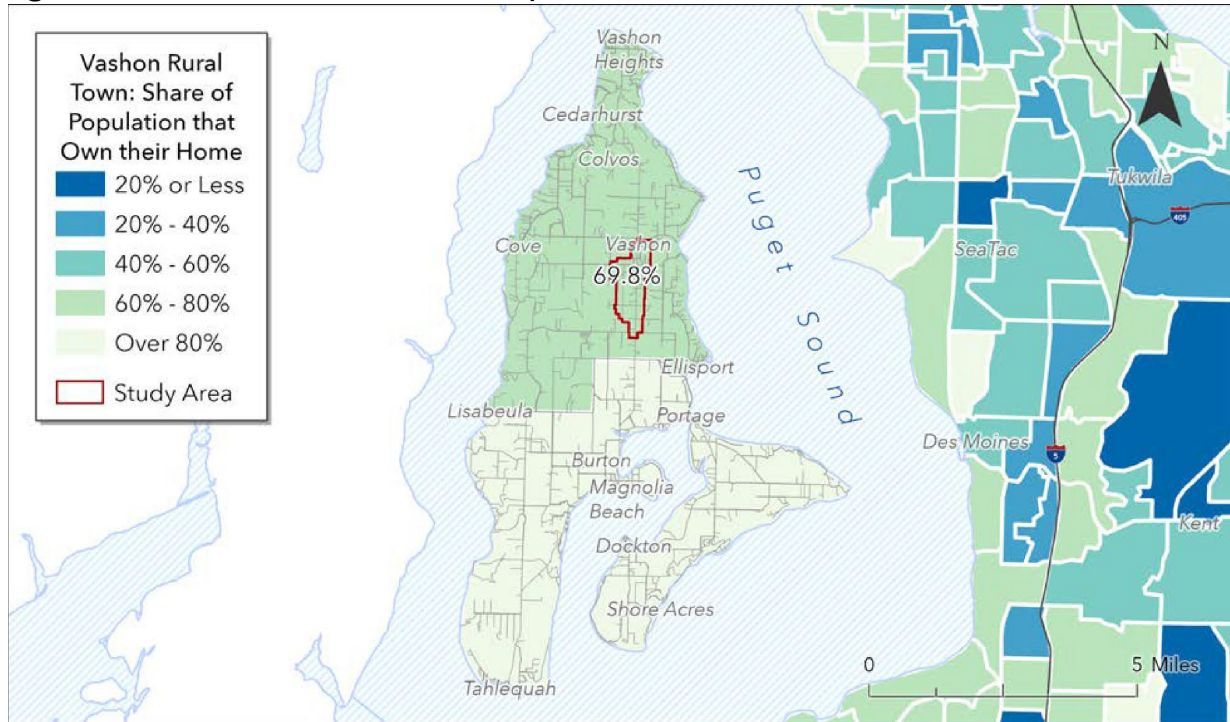
Source: ECONorthwest; ACS

**Figure 94: Vashon Rural Town Share of Population that is Within 200% of the Federal Poverty Level**



Source: ECONorthwest; ACS

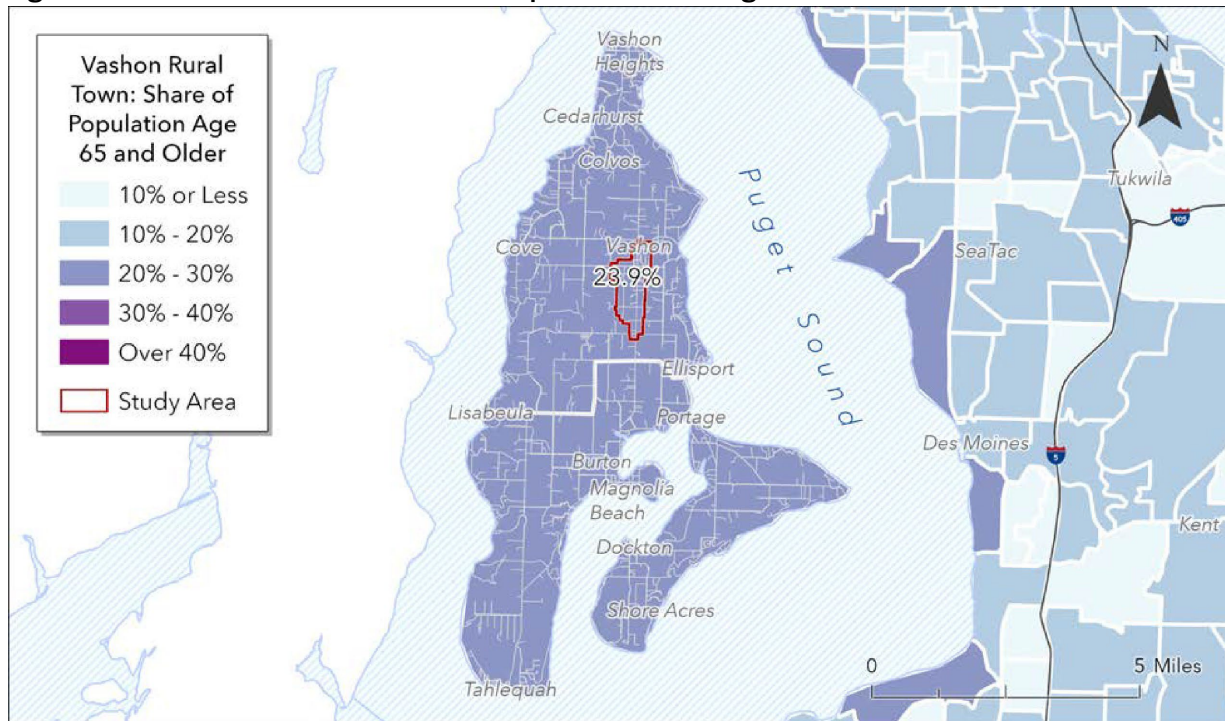
**Figure 95: Vashon Rural Town Share of Population that Owns Their Home**



Source: ECONorthwest; ACS

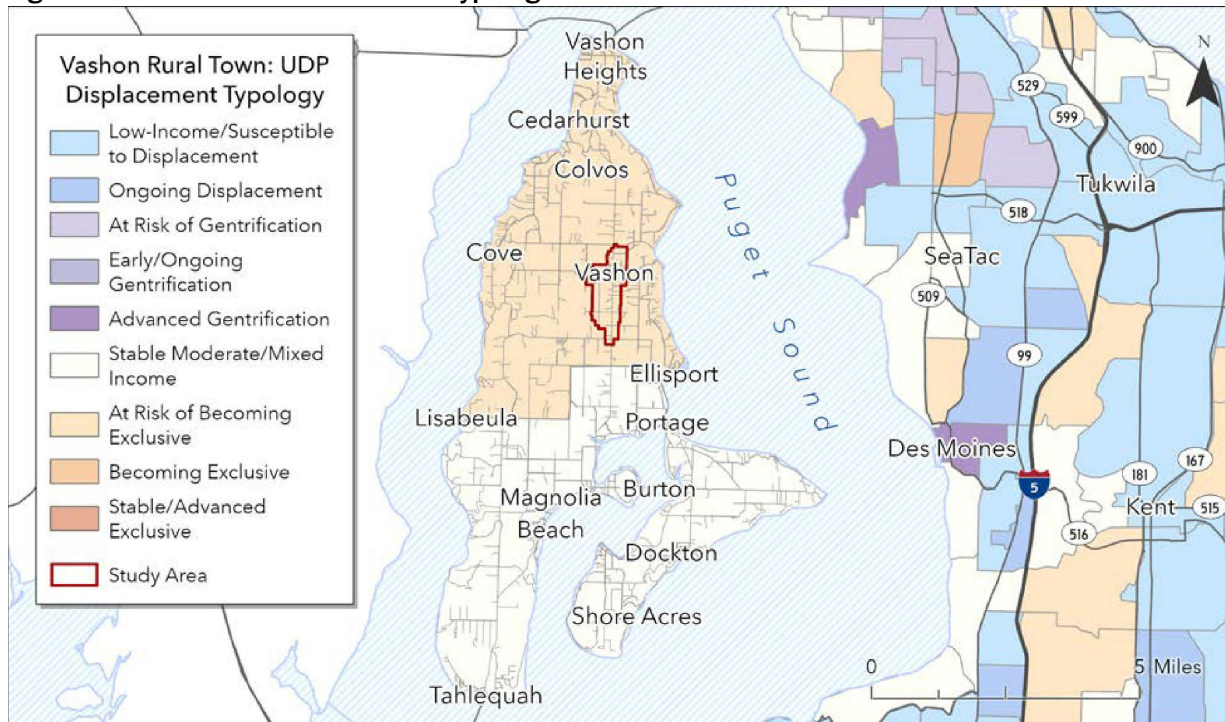


**Figure 96: Vashon Rural Town Share of Population that is Age 65 and Older**



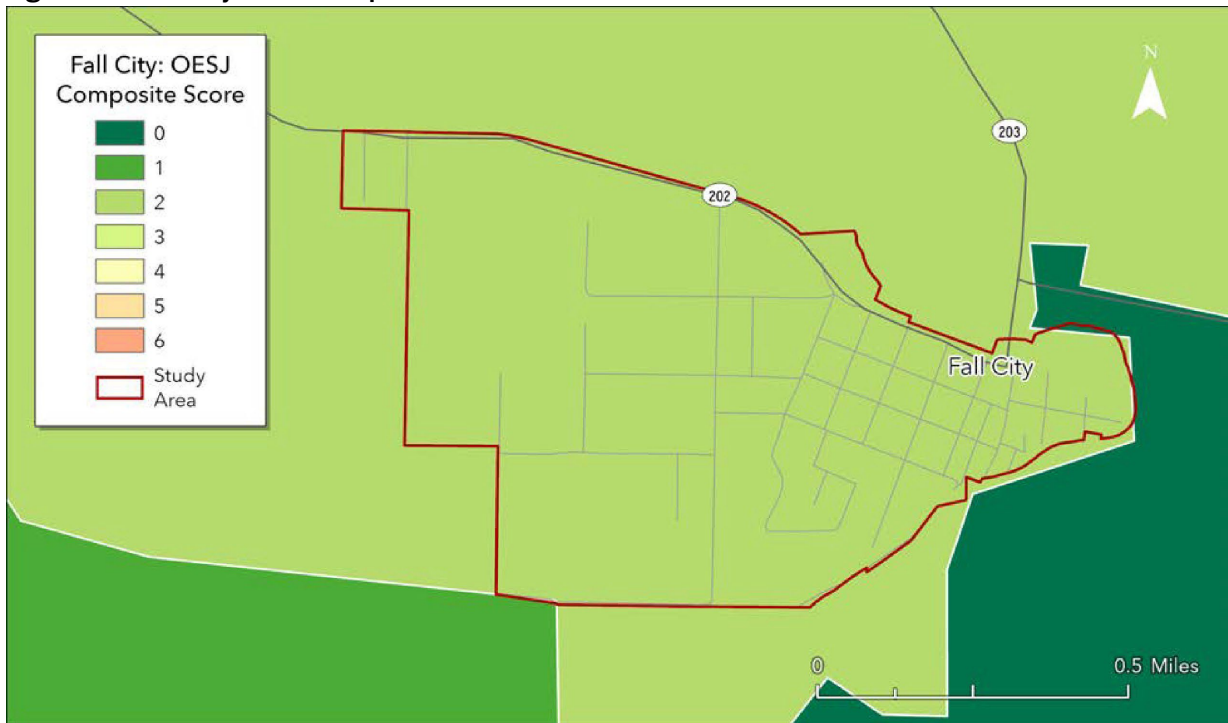
Source: ECONorthwest; ACS

**Figure 97: Vashon Rural Town UDP Typologies**



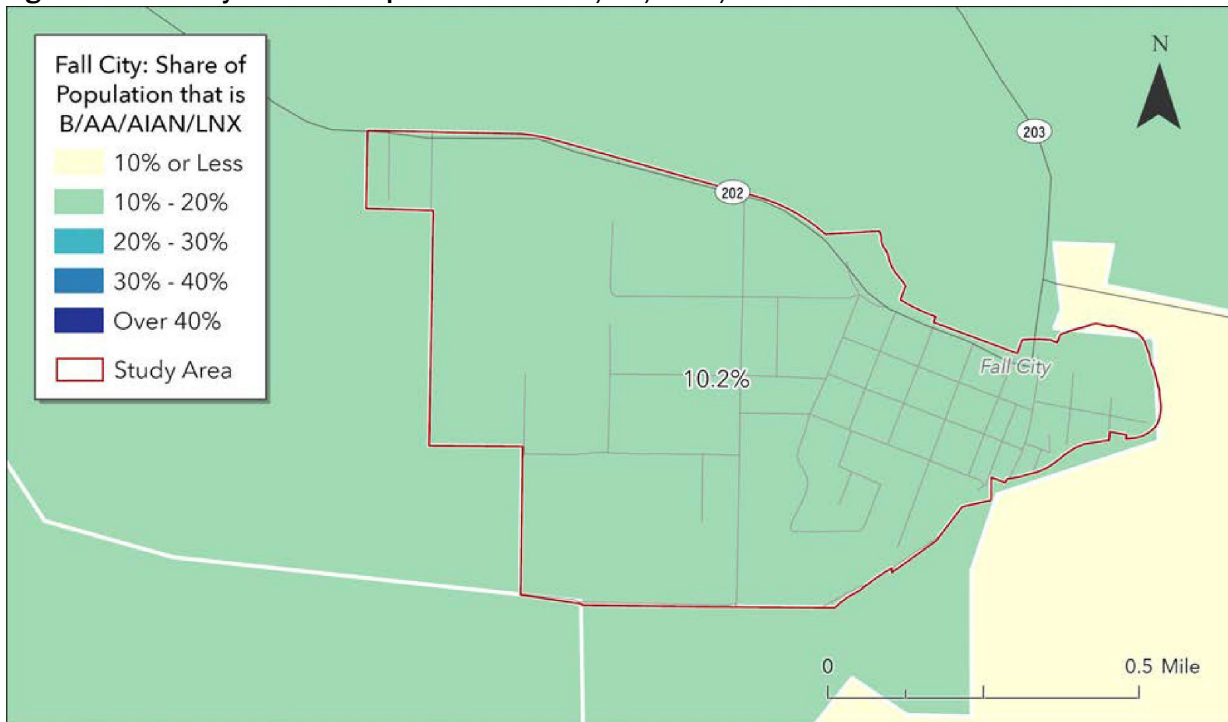
Source: ECONorthwest; UDP

Figure 98: Fall City OESJ Composite Score



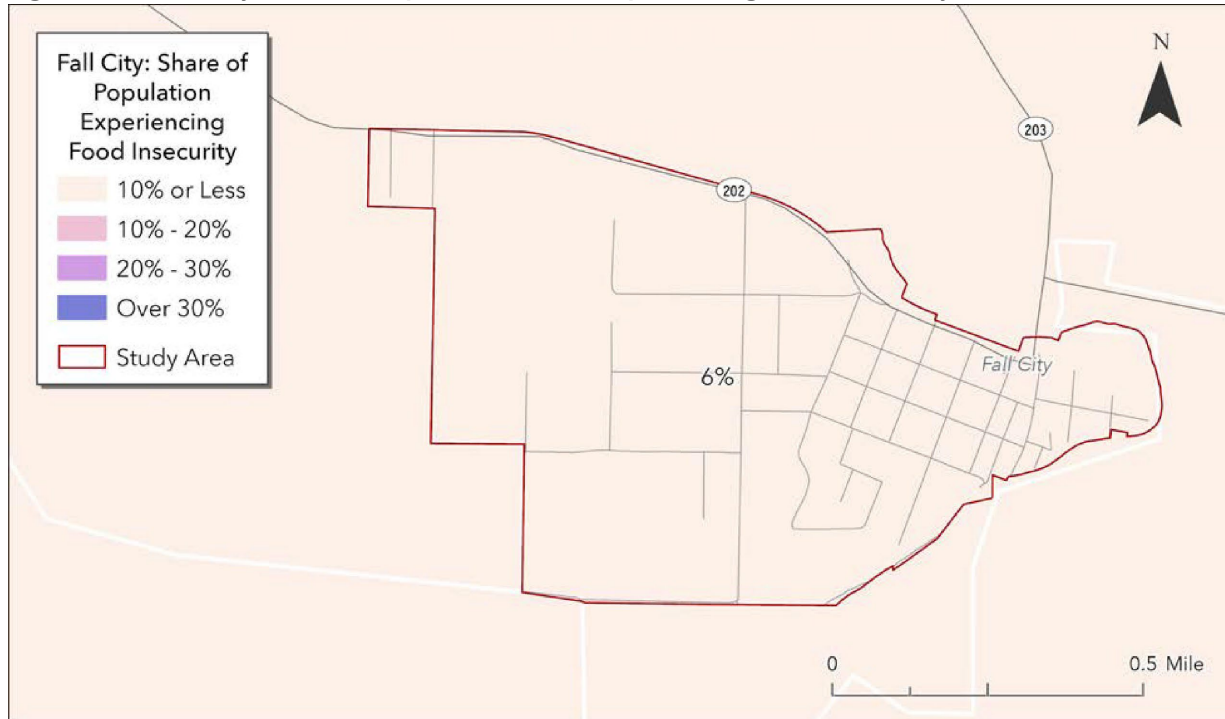
Source: ECONorthwest; ACS

Figure 99: Fall City Share of Population that is B/AA/AIAN/LNX



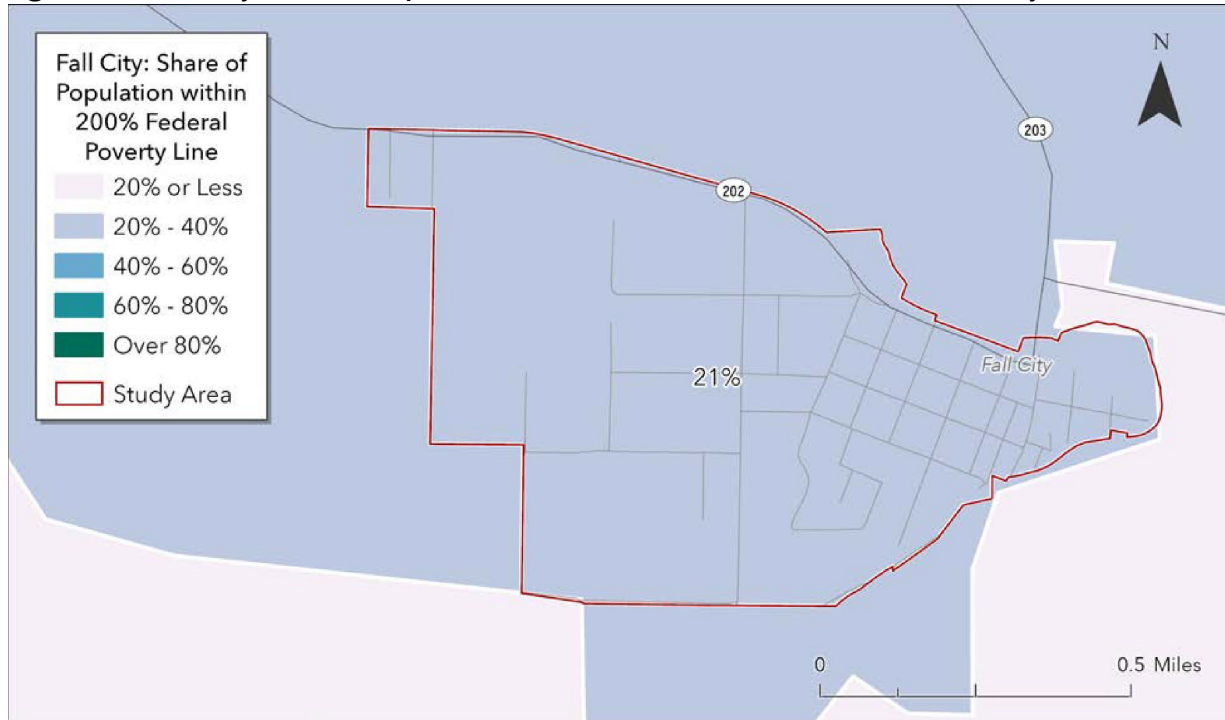
Source: ECONorthwest; ACS

**Figure 100: Fall City Share of Population that is Experiencing Food Insecurity**



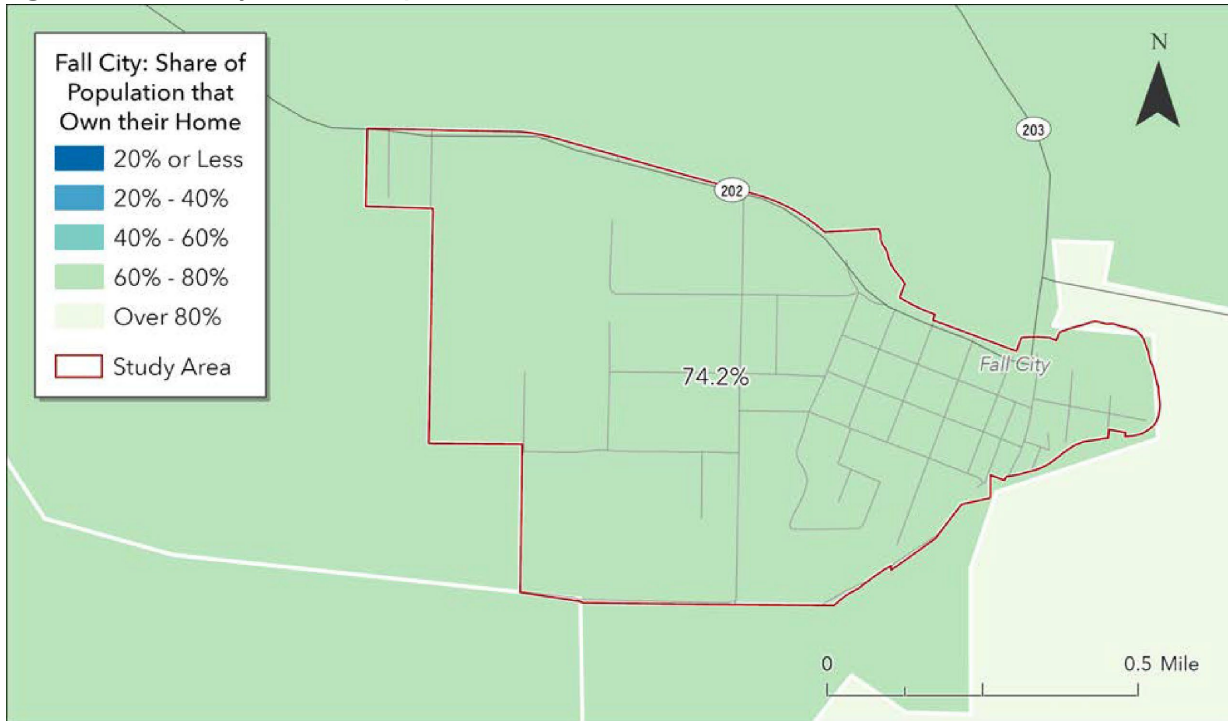
Source: ECONorthwest; ACS

**Figure 101: Fall City Share of Population that is Within 200% of the Federal Poverty Level**



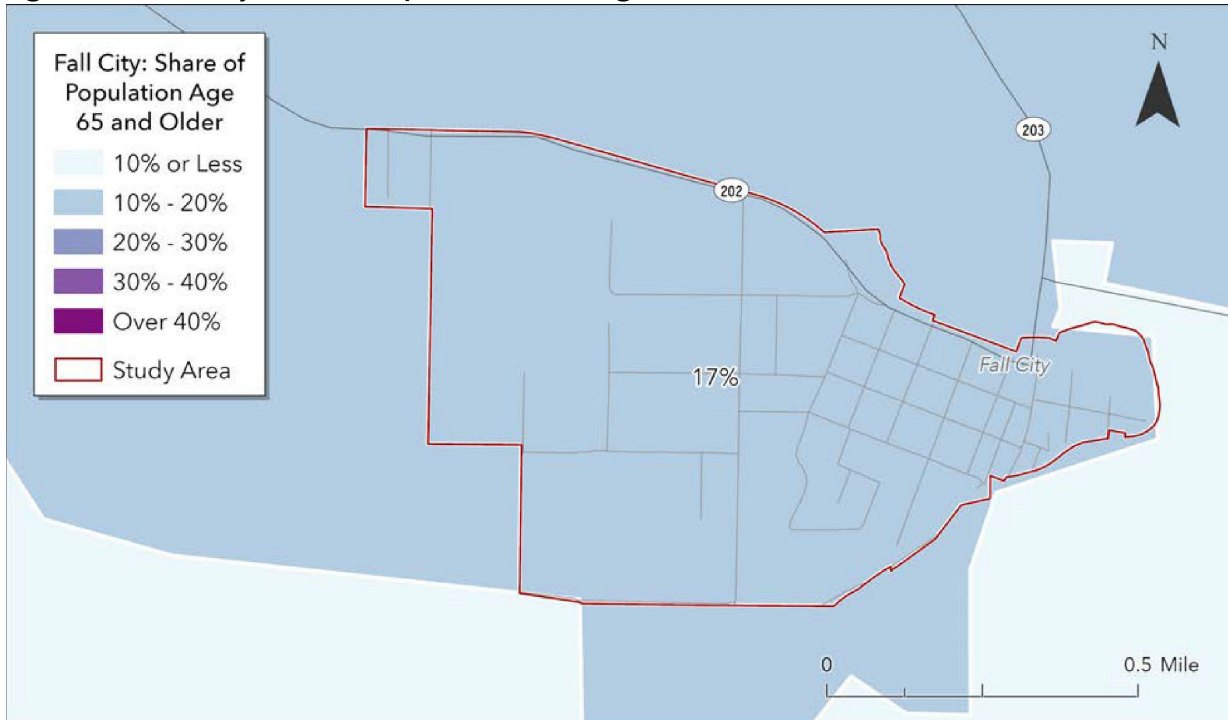
Source: ECONorthwest; ACS

**Figure 102: Fall City Share of Population that Owns Their Home**



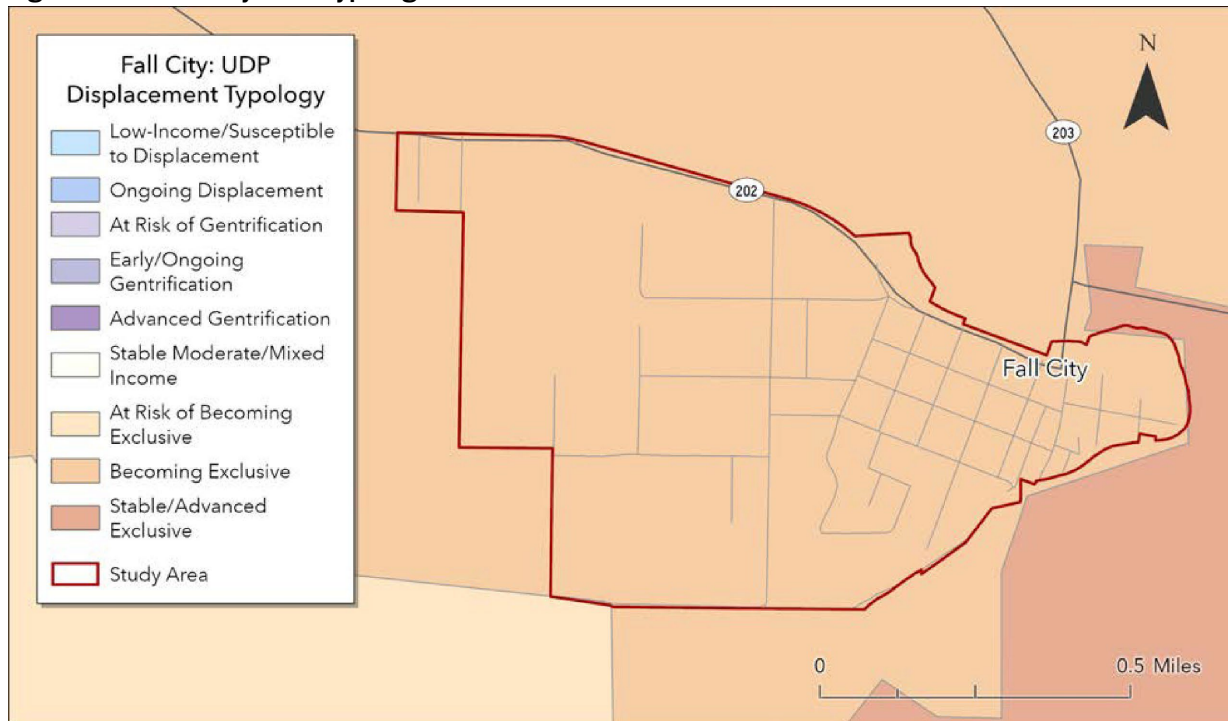
Source: ECONorthwest; ACS

**Figure 103: Fall City Share of Population that is Age 65 and Older**



Source: ECONorthwest; ACS

Figure 104: Fall City UDP Typologies



Source: ECONorthwest; UDP

## Financial Feasibility Methods

The second track of our analysis included comparing development feasibility, and the impact of the zoning changes, across different areas and prototypical townhouse developments, or *prototypes*. To do this, ECONorthwest used a common method called a *residual land value analysis*. Residual land value (RLV) is an estimate of what a developer would be able to pay for land given:

1. The property's income from rental or sales revenue
2. The cost to build as well as to operate the building
3. The investment returns needed to attract capital for the project.

In other words, it is the budget that developers have remaining for land after all the other development constraints have been analyzed. The RLV approach has multiple advantages:

1. It does not rely on land prices as an input. Rather, observed land prices can be compared with the model outputs to help calibrate the model and ensure it reflects reality.
2. It can assess the impacts of changes to the development code because these policies principally affect land value, especially in the short run.

---

**Land budget**-This term is used throughout this report and is defined as the price (or price per square) of land that a site would need to be purchased at to make a development type feasibility. The land budget is what a developer can pay for land and still maintain a financially feasible development project.

---

We analyzed each of the prototypes using this RLV approach. The results from this method describe a general analysis of prototypes and do not consider the many potential unique conditions that could be a factor in development feasibility (e.g., increased predevelopment costs, low land basis from longtime land ownership). For these reasons, a residual land value analyses should be thought of as a strong indicator of the relative likelihood of development, rather than an absolute measure of return to the investor or developer.

To conduct this analysis, 2021 real estate data inputs were gathered from multiple sources including CoStar, Redfin, RS Means, the King County Assessor, and various interviews with local developers and real estate experts. Data include building program assumptions (e.g., unit size, parking ratios, building heights), operating assumptions (e.g., sales prices, rents, operating costs), development cost assumptions (e.g., hard costs, soft costs), and valuation metrics (e.g., spread on cost thresholds). The RLV results were then compared to land values of improved tax lots, which was derived from the assessor data for land of tax lots zoned R-12 to R48 in our focus areas. Because RLV is essentially a land budget, a higher RLV relative to existing land prices indicates better development feasibility.

**Example: Exploring the RLV Method of a Feasible vs. Infeasible Project**

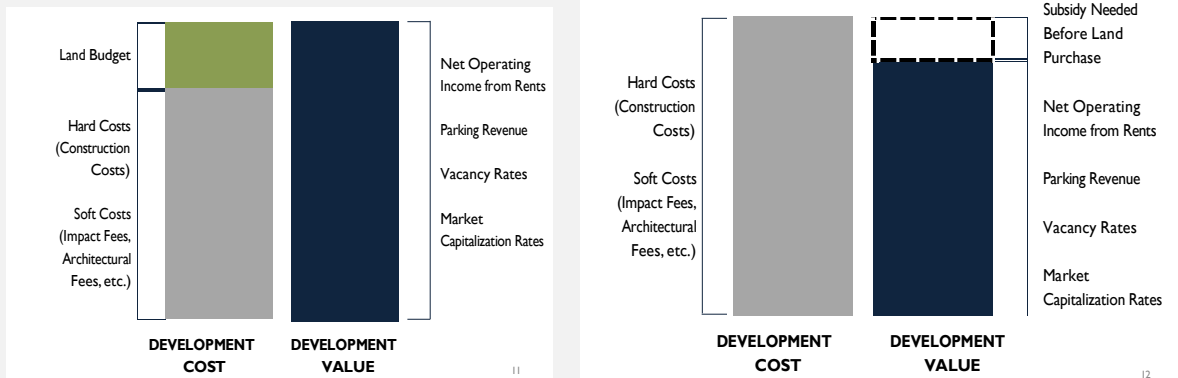
Figure 105 summarizes the residual land value method by illustrating two example developments (or prototypes), one which is feasible and the other likely infeasible. In both scenarios, the right-hand column (shown in dark blue) illustrates the total value that comes from the project (derived from rental revenue less any operating expenses and vacancy costs). The left-hand column (shown primarily in grey) shows the total costs to build the project, both the hard construction costs and the soft costs such as the design and city fees.

If the blue column is greater than the grey column, there is budget leftover to buy the land (shown in green). A positive land budget means that a proposed development project is likely to be feasible (contingent on the price for which the land is being offered). If the blue column is smaller than the grey column, then a subsidy is needed to get the project to be feasible (shown in a dashed outline). A land budget below \$0 means that a proposed development project is not feasible, absent offsetting subsidies or incentives that can cover the difference.

**Figure 105: Land Budget (RLV) Method for Pro Forma Modeling**

*Likely Feasible– Developer has money to pay for land*

*Likely Infeasible– Development requires subsidy, even before land purchase*



Source: ECONorthwest.

## Financial Feasibility Assumptions

**Figure 106: Operating Cost Assumptions**

| Operating Revenue and Cost Assumptions |             |                |           |           |           |           |
|--|-------------|----------------|-----------|-----------|-----------|-----------|
| Variable                               | Assumption  |                |           |           |           |           |
| Revenue for Sale TH                    | Vashon      | North Highline | Skyway    | Redmond   | Fall City | Fairwood  |
| Studio                                 | \$384,000   | \$388,000      | \$344,500 | \$344,500 | \$502,000 | \$439,000 |
| 1-Bed                                  | \$473,000   | \$447,000      | \$415,000 | \$415,000 | \$589,000 | \$466,000 |
| 2-Bed                                  | \$583,000   | \$500,000      | \$499,000 | \$499,500 | \$693,000 | \$494,000 |
| 3-Bed                                  | \$753,000   | \$601,000      | \$621,000 | \$621,000 | \$763,000 | \$523,000 |
| 4-Bed                                  | \$1,045,000 | \$649,000      | \$635,000 | \$635,500 | \$898,000 | \$618,000 |
| <u>Revenue for Sale ADU</u>            |             |                |           |           |           |           |
| Studio                                 | \$365,000   | \$369,000      | \$327,000 | \$327,000 | \$477,000 | \$417,000 |
| 1-Bed                                  | \$449,000   | \$405,000      | \$394,000 | \$394,000 | \$560,000 | \$443,000 |
| 2-Bed                                  | \$554,000   | \$475,000      | \$474,000 | \$475,000 | \$658,000 | \$469,000 |

Source: ECONorthwest; Redfin, Zillow

**Figure 107: Development Cost Assumptions**

| Development Cost Assumptions              |            |                                |
|---|------------|--------------------------------|
| Variable                                  | Assumption | Unit of Measure                |
| <u>Hard Costs</u>                         |            |                                |
| Kitchen                                   | \$ 390     | Per square foot                |
| Bathroom                                  | \$ 460     | Per square foot                |
| Other Interior Space                      | \$ 70      | Per square foot                |
| Garage                                    | \$ 60      | Per square foot                |
| Surface                                   | \$ 10      | Per square foot                |
| Landscape                                 | \$ 10      | Per square foot                |
| Rental costs as percent of ownership cost | 90%        |                                |
| <u>Other Development Costs</u>            |            |                                |
| Soft costs (incl permitting and taxes)    | 25%        | Percent of hard costs          |
| Contingency fee                           | 5%         | Percent of hard and soft costs |
| Developer fee/rental                      | 4%         | Percent of development costs   |
| Sales Commission                          | 4%         |                                |
| <u>Financial Returns</u>                  |            |                                |
| Spread on cost (ownership)                | 12%        |                                |
| Loan to Cost                              | 80%        |                                |
| Interest Rate                             | 5.5%       |                                |
| Number of Periods                         | 30         |                                |
| Debt Service Coverage Ratio               | 1.3        |                                |

Source: ECONorthwest; Developer Interviews, RS Means





King County City Council  
1200 King County Courthouse  
516 Third Avenue  
Seattle, WA 98104

Chair Balducci and King County Councilmembers,

**RE: HDC Opposes the Proposed Language on Townhouses and Accessory Dwelling Units Provisions Included in the Striking Amendment S4 to Proposed Ordinance 2019-0413**

On behalf of the Housing Development Consortium (HDC), thank you for this opportunity to comment on the Cottage Housing and Accessory Dwelling Units (ADUs) provisions included in the striking amendment S4 to proposed ordinance 2019-0413. We express concerns about the proposed changes allowing unlimited basement floor area for Detached Accessory Dwelling Units (DADU) and allowing siting of townhouses as accessory units. We ask you to introduce an amendment striking line 1553 of striker 4 allowing townhouses as accessory and Line 1577 of striker 4 providing the detached accessory dwelling units, unlimited basements. We urge you to not include the language in the final striker amendment and require Council Central Staff to conduct a racial equity analysis to assess if these proposed ADU policy changes would impact some communities differently and include a special focus on race-based disparities.

As you conduct the analysis, we implore you to lead with questions on who benefits most and if there are tools that can be put in place to prevent continuation of exclusionary zoning. An example of a jurisdiction to learn from is Seattle's analysis that showed that wealthy white homeowners would benefit the most from similar policy changes. This is especially crucial at a

**Housing Development Consortium  
of Seattle-King County**

1326 5th Avenue, Suite 230, Seattle, WA 98101  
206.682.9541 | [www.housingconsortium.org](http://www.housingconsortium.org)



time when an increasing number of homeowners across the US are attracted to the flexibility and income generating potential of ADUs.

HDC fully supports ADUs and DADUs as tools that provide opportunities for multigenerational housing, help us decrease our environmental and carbon footprint, and provide some homeowners with a way to stay in their homes and age in place—an important benefit as the cost of living rises in King County. It is a step that would generate gentle infill housing options, but much more must be done to ensure that the regulatory changes ensure equitable growth. However, there are longstanding race-based disparities in homeownership rates and household incomes in Unincorporated King County that must be further considered before acting.

ADUs as potential tools for both increasing affordable housing stock in the private market and **curbing displacement of low-income homeowners**, must be committed to addressing racial disparities so that communities of color across the UIKC benefit from created ADU opportunities.

As you well know, the lack of affordable housing is an ongoing crisis in our region, a crisis only made worse by the coronavirus (COVID-19) pandemic and laying bare the pre-existing inequities in our housing system. We now face an unprecedented existential threat to King County's most vulnerable residents. Key to our success in addressing the dual affordable housing crisis and pandemic recovery, are policy tools grounded on creating alternative systems that lead with equity. Therefore, we respectfully and urgently request the following:

**Housing Development Consortium  
of Seattle-King County**

1326 5th Avenue, Suite 230, Seattle, WA 98101  
206.682.9541 | [www.housingconsortium.org](http://www.housingconsortium.org)



**HOUSING  
DEVELOPMENT**  
*consortium*

We thank you again for the opportunity to comment and look forward to continuing to work with you on ensuring that King County remains a diverse, inclusive, and affordable community for people of all incomes.

Sincerely,

A handwritten signature in blue ink that reads "Marty Kooistra".

**Marty Kooistra**  
Executive Director

A handwritten signature in black ink that reads "Patience .M. Malaba".

**Patience Malaba**  
Director of Government Relations & Policy

**Housing Development Consortium  
of Seattle-King County**

1326 5th Avenue, Suite 230, Seattle, WA 98101  
206.682.9541 | [www.housingconsortium.org](http://www.housingconsortium.org)

**Certificate Of Completion**

|  |                            |
|--|----------------------------|
| Envelope Id: EFD7D5FBABF14B328F83F01D76B32093                              | Status: Completed          |
| Subject: Please DocuSign: Motion 16194.docx, Motion 16194 Attachment A.pdf |                            |
| Source Envelope:   |                            |
| Document Pages: 2  | Signatures: 2              |
| Supplemental Document Pages: 105   | Initials: 0                |
| Certificate Pages: 2   | Envelope Originator:       |
| AutoNav: Enabled   | Cherie Camp                |
| Enveloped Stamping: Enabled  | 401 5th Ave                |
| Time Zone: (UTC-08:00) Pacific Time (US & Canada)                          | Suite 100                  |
|  | Seattle, WA 98104          |
|  | Cherie.Camp@kingcounty.gov |
|  | IP Address: 198.49.222.20  |

**Record Tracking**

|                                      |                                 |                    |
|--------------------------------------|---------------------------------|--------------------|
| Status: Original                     | Holder: Cherie Camp             | Location: DocuSign |
| 9/8/2022 12:38:57 PM                 | Cherie.Camp@kingcounty.gov      |                    |
| Security Appliance Status: Connected | Pool: FedRamp                   |                    |
| Storage Appliance Status: Connected  | Pool: King County General (ITD) | Location: DocuSign |

**Signer Events**

Claudia Balducci  
 claudia.balducci@kingcounty.gov  
 Council Chair  
 King County General (ITD)  
 Security Level: Email, Account Authentication (None)

**Signature**

DocuSigned by:  
  
 7E1C273CE9994B6...  
 Signature Adoption: Pre-selected Style  
 Using IP Address: 73.181.163.252

**Timestamp**

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 Viewed: 9/9/2022 2:58:17 PM  
 Signed: 9/9/2022 2:58:40 PM

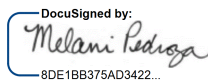
**Electronic Record and Signature Disclosure:**

Not Offered via DocuSign  
 Supplemental Documents:

Motion 16194 Attachment A.pdf

Viewed: 9/9/2022 2:58:21 PM  
 Read: Not Required  
 Accepted: Not Required

Melani Pedroza  
 melani.pedroza@kingcounty.gov  
 Clerk of the Council  
 King County Council  
 Security Level: Email, Account Authentication (None)

DocuSigned by:  
  
 8DE1BB375AD3422...  
 Signature Adoption: Uploaded Signature Image  
 Using IP Address: 50.35.126.47

Sent: 9/9/2022 2:58:44 PM  
 Viewed: 9/9/2022 3:00:00 PM  
 Signed: 9/9/2022 3:00:07 PM

**Electronic Record and Signature Disclosure:**

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 Supplemental Documents:

Motion 16194 Attachment A.pdf

Viewed: 9/9/2022 3:00:04 PM  
 Read: Not Required  
 Accepted: Not Required

**In Person Signer Events****Signature****Timestamp****Editor Delivery Events****Status****Timestamp****Agent Delivery Events****Status****Timestamp****Intermediary Delivery Events****Status****Timestamp****Certified Delivery Events****Status****Timestamp****Carbon Copy Events****Status****Timestamp**

| <b>Witness Events</b> | <b>Signature</b> | <b>Timestamp</b> |
|-----------------------|------------------|------------------|
|-----------------------|------------------|------------------|

| <b>Notary Events</b> | <b>Signature</b> | <b>Timestamp</b> |
|----------------------|------------------|------------------|
|----------------------|------------------|------------------|

| <b>Envelope Summary Events</b> | <b>Status</b> | <b>Timestamps</b> |
|--------------------------------|---------------|-------------------|
|--------------------------------|---------------|-------------------|

|                     |                  |                      |
|---------------------|------------------|----------------------|
| Envelope Sent       | Hashed/Encrypted | 9/8/2022 12:40:42 PM |
| Certified Delivered | Security Checked | 9/9/2022 3:00:00 PM  |
| Signing Complete    | Security Checked | 9/9/2022 3:00:07 PM  |
| Completed           | Security Checked | 9/9/2022 3:00:07 PM  |

| <b>Payment Events</b> | <b>Status</b> | <b>Timestamps</b> |
|-----------------------|---------------|-------------------|
|-----------------------|---------------|-------------------|