



City of Seattle

Department of Planning and Development

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Director's Report & Recommendation Lowrise Multifamily Zoning Code Adjustments May, 2014

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(Includes height limit, exceptions, FAR, and density topics.)

1. Purpose and Overview

1.1 Purpose of lowrise zones and the 2010 major update

Seattle's Lowrise Multifamily zones play an important role in accommodating residential growth. The City is currently embarking on a major update to the Comprehensive Plan. Titled "Seattle 2035," the plan update will establish a framework to accommodate an additional 70,000 households over the next 20 years. Though they occupy just 10% of the city's gross land area, lowrise multifamily zones are expected to accommodate a sizeable amount this growth. Lowrise multifamily zones tend to be located in urban villages and urban centers and along arterial roadway corridors and are often a transition between single-family zones and neighborhood commercial centers. Receiving growth in lowrise-zoned areas allows single-family zones to remain single-family neighborhoods.

The Comprehensive Plan provides direction about the purpose of multifamily zones. There are two Land Use Goals related to multifamily-zoned areas:

Land Use Goal 11: Encourage...a diversity of multifamily housing types to meet the diverse needs of Seattle's present and future populations.

Land Use Goal 12: Promote a residential development pattern consistent with the urban village strategy, with increased availability of housing at densities that promote walking and transit use near employment concentrations, residential services and amenities.

Beginning in 2005, DPD and elected officials identified a need for a major update to the City's lowrise multifamily zones. Prior to the update, the basis for the lowrise multifamily zoning code dated to 1982. There were several major reasons for pursuing the update:

- The code was out of date and predated design review.
- The code was not producing good design outcomes (townhouse "six-packs" were very common).
- The code was not adequately encouraging infill density.
- The code did not encourage enough affordable and rental housing stock.
- The code did not encourage sustainable design features.

The Director's Report prepared in July 2008 for the lowrise multifamily code update listed the following seven objectives for the update.

1. Help create high-quality multifamily neighborhoods;
2. Support Comprehensive and Neighborhood Plan objectives;
3. Promote sustainable development;
4. Encourage new investment in a variety of housing types, including affordable housing;

5. Recognize special locational characteristics: urban centers and villages and light rail station areas; adjacency to single-family zoned areas.
6. Foster creative design through development flexibility; and
7. Make the code easier to use and understand, complementing the adopted amendments to neighborhood commercial zoning.

The eventual Lowrise Multifamily Code update (Ordinance 123495) received a final 9-0 vote of approval by City Council in December 2010. The code update completely revamped SMC Chapter 23.45 of the Land Use Code, reducing the number of lowrise zones from five (LDT, L1, L2, L3, L4) to three (LR1, LR2, LR3) and introducing several changes to design standards, including a Floor Area Ratio (FAR*) standard, application of the green factor landscaping requirement, and more flexible front side and rear setback requirements. The code identified a variety of housing types (Townhouse, Rowhouse, Apartments, and Cottage Housing) that would each be subject to varied design standards. The code update also emphasized concentrating future growth in designated urban villages and urban centers. In these areas, certain development types are allowed higher FAR, lower vehicle parking requirements, and higher height limits.

* FAR is an amount of floor area that may be built expressed as a ratio to the size of the lot.

1.2 Events leading to this update

In October 2013, City Council President Sally Clark asked DPD to review building height standards in lowrise multifamily-zoned areas, particularly in response to concerns about the Lowrise 3 zones. Accordingly, DPD began studying buildings recently constructed in lowrise multifamily-zoned areas and considering code changes to help ensure the new buildings fit into neighborhoods. In a memo to Sally Clark, DPD indicated that it would focus primarily on reviewing building height and floor area ratios and aim to submit legislation to Council in the first quarter of 2014.

In early 2014, additional lowrise zoning topics emerged, particularly public comments from residents in Lowrise 1 zoned areas concerned about the density of development and setbacks. After conversation with the Mayor's office, community members, Councilmember Mike O'Brien's office, and others, DPD slightly expanded the project scope to address LR1 areas.

The following recommendations respond directly to Sally Clark's letter and also encompass a few additional topics. We consider these recommendations to be a thorough evaluation of development outcomes in lowrise zones following the 2010 major update and a corresponding set of code adjustments. The intent focuses on identifying and addressing unexpected outcomes that stray from the policy intent of the 2010 major update.

1.3 Executive summary of recommendations

The remainder of this report provides analysis of the key issues leading to unexpected outcomes in the Lowrise zones after the 2010 major update. Our recommendations for code adjustments are described in detail in section 4. The list below is an executive summary of the recommendations and proposed code adjustments.

Encourage better response to context for apartment development, particularly in Lowrise 3 zones in urban villages and urban centers.

- Eliminate a height allowance for an additional 4' of height above the base height limit for apartment developments with a partially below-grade story.
- Eliminate the FAR exemption for a partially below-grade story for apartment housing types.

Address perceived height and scale of development on sloping sites.

- Establish a new height control to limit the maximum street-facing façade height.

Adjust code provisions that allow use of clerestories and FAR calculations in unexpected ways.

- Place limits on the use of clerestories and similar features.
- Include unenclosed exterior stairs, hallways, and breezeways in chargeable FAR.
- Include the floor area of loft spaces in the FAR calculation.

Address unanticipated density levels and adjacencies in the Lowrise 1 zone.

- Add a side setback requirement for rowhouse development if adjacent to other types of housing.
- Change rounding requirements for the density limits in lowrise zones.
- Add density limits for rowhouses in the LR1 zone.

2. Participation

Between December 2013 and March 2014, DPD conducted an outreach process to inform the recommendations. The process included the following steps:

- **Community Meeting on Capitol Hill — January 14, 2014**
Held at Lowell Elementary School, over 170 people attended. DPD received many public comments and suggestions during and following the meeting. See the community comment themes on the next two pages for a recap of the meeting.
- **Meetings with Seattle Speaks Up**
On three occasions, DPD staff met with members of the self-organized Seattle Speaks Up group. Seattle Speaks Up organized a petition asking for changes to height limits in particular and is composed of residents and community members.
- **Seattle Planning Commission**
 - Full Commission briefing
 - Housing and Urban Neighborhoods Committee
- **Architects / Designers**
DPD held a meeting targeted to architects and designers by reaching out to the Congress of Residential Architects (CoRA) and American Institute of Architects (AIA) local chapter groups.
- **Other Community Conversation and Input**
 - Eastlake Community Council, March 2014
 - Livable Ballard petition received April 2014
 - Comment letter from the City Neighborhood Council (CNC) received April 2014
- **Website Social Media and Blogs**
DPD posted periodic project updates on the project website and announced outreach in the department's blog and on social media.
- **Renter-Focused Outreach Strategies (ongoing)**
DPD continues to explore specific outreach targeted to a renter audience, through both the City's Comprehensive Plan (Seattle 2035) outreach and other outreach channels, including collaboration with the Office of Housing.

Community Comment Themes

DPD received a large amount of public comment. Over 170 people attended the January 14 meeting, and DPD received more than 70 letters, handwritten forms, and emails following the

meeting. DPD reviewed all comments and attempted to summarize and quantify the comment themes. (See summary on the following page.) In general, comments predominantly supported reducing height limits across all lowrise zones. Many comments supported returning to the previous 30' height limit (for all types of development) in place before the 2010 multifamily code update and called for better responses to existing neighborhood context in the design of new buildings. There were also a substantial number of comments in support of affordable housing, advocating for minimal or no change to the code, and in support of dense, walkable neighborhoods.



Input From Architects and Designers

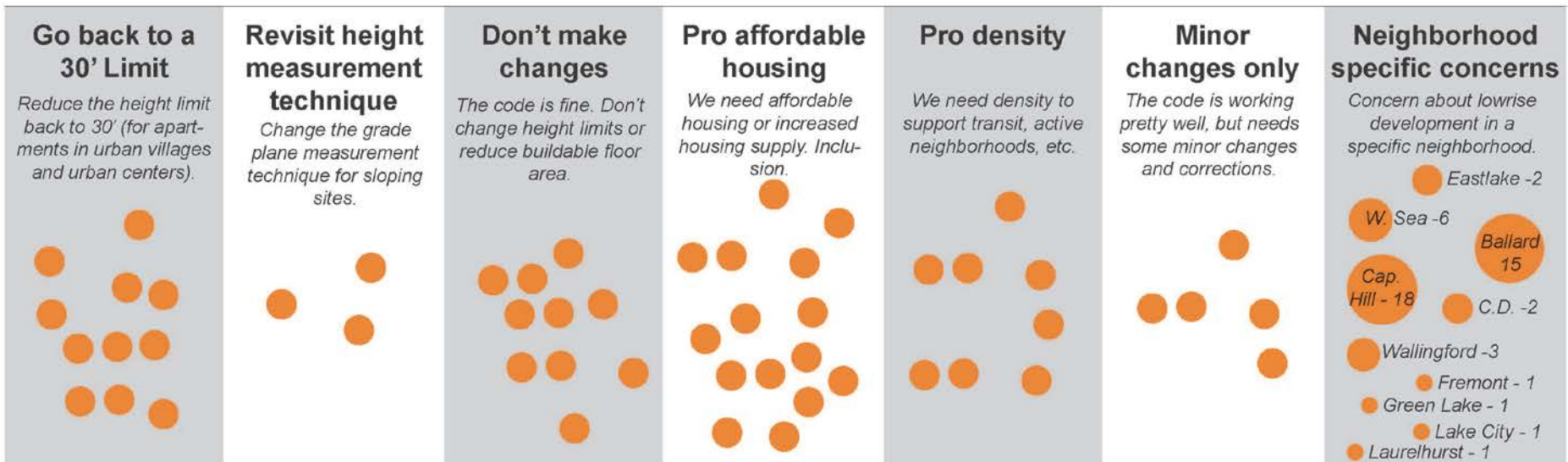
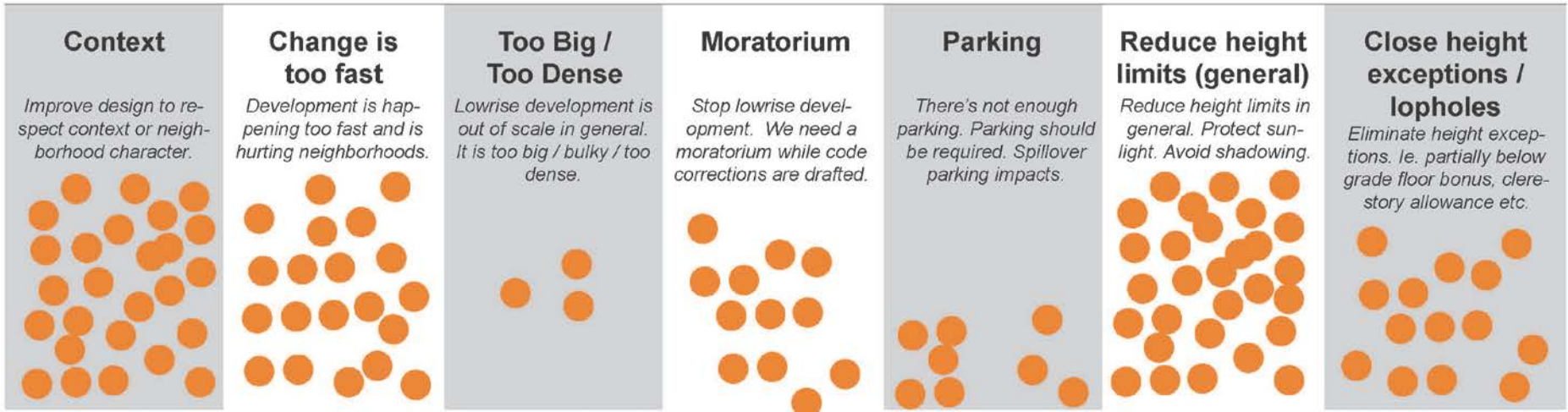
DPD received direct guidance from architects and designers on January 23, 2014. In general, the architects supported the code currently in place. The group supported the existing height limits and current approaches to floor area and agreed with DPD's preliminary recommendation regarding limitations on the use of clerestories subject to height exceptions. The designer group encouraged DPD to consider additional performance criteria, such as design review, in exchange for a 40' height limit for apartment developments in urban villages and urban centers.

Planning Commission Guidance

The Seattle Planning Commission (SPC) provided direct guidance to DPD staff for this project on several occasions. The Planning Commission's recommendation was documented in a memo submitted to DPD on April 11, 2014 (see Appendix). Many of the recommendations contained in this report are consistent with the Planning Commission's memo. The Commission highlighted the important role Lowrise zones play in meeting City goals for welcoming and retaining a diversity of household types and income levels (SPC memo, pg. 2). The Commission supported introducing a new maximum street-facing façade height limit, limiting the use of clerestories. The Commission recommended and retaining incentives and exceptions for buildings that include a partially below-grade story for projects with ground-related units only (SPC memo, pg. 2-3).

The Commission also recommended a new design review requirement or additional performance criteria for any apartment building that accesses a 40' height limit or maximum 2.0 FAR in the Lowrise 3 zone (SPC memo, pg. 3). DPD's recommendation does not carry forward this particular suggestion because we believe design review would already be required of most of these buildings, particularly given pending design review requirements for micro-housing.

The Commission did emphasize the "potentially ameliorating effect" of proposed micro-housing legislation, noting that many of the buildings brought to the City's attention by residents concerned with lowrise development are micro-housing developments. The Commission anticipates that new design review thresholds for micro-housing will help alleviate some design issues that have exacerbated concerns (SPC memo, pg. 4.)



The numbers in the circles in Neighborhood specific concerns indicate the number of comments in letters that were focused on a specific neighborhood.

3. Analysis

DPD reviewed and conducted analysis of building and permitting outcomes under the new Lowrise Multifamily Code. The primary sources of information are 1.) overall permitting data and statistics from developments in LR zones since the new code went into effect; 2.) review of specific representative plan examples; and 3.) direct observation and review of physical built or under-construction projects.

3.1 Lowrise Multifamily Zones Citywide

On the following page, a map shows the extent and location of Lowrise multifamily-zoned areas citywide, summarized as follows:

- Lowrise zones cover 3,489 acres or 10% of Seattle’s total gross acres.
- About half of the lowrise zones are within urban villages and urban centers, and most of the rest are located along arterial corridors.
- Most lowrise zones have been in place for over 30 years.
- Only the specific development standards (not the geography) of lowrise zones changed in 2010.

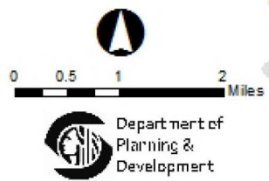
- **Lowrise 1** Zones: 825 acres (21.8% of all LR zones)
- **Lowrise 2** Zones: 1,124 acres (29.7% of all LR zones)
 - 523 acres outside of urban villages, urban centers, or station areas
 - 601 acres inside urban villages, urban centers, or station areas
- **Lowrise 3** Zones: 1,833 acres (48.5% of all LR zones)
 - 874 acres outside of urban villages, urban centers, or station areas
 - 959 acres inside urban villages, urban centers, or station areas

- The largest contiguous areas of LR zoning are found in the following neighborhoods:
 - Capitol Hill
 - Ballard
 - Eastlake
 - Fremont and Phinney Ridge
 - Delridge
 - North Beacon Hill
 - Columbia City
 - Othello

**Lowrise Multi-family Zones,
Urban Centers and Urban Villages**
(Except Manufacturing / Industrial Centers)

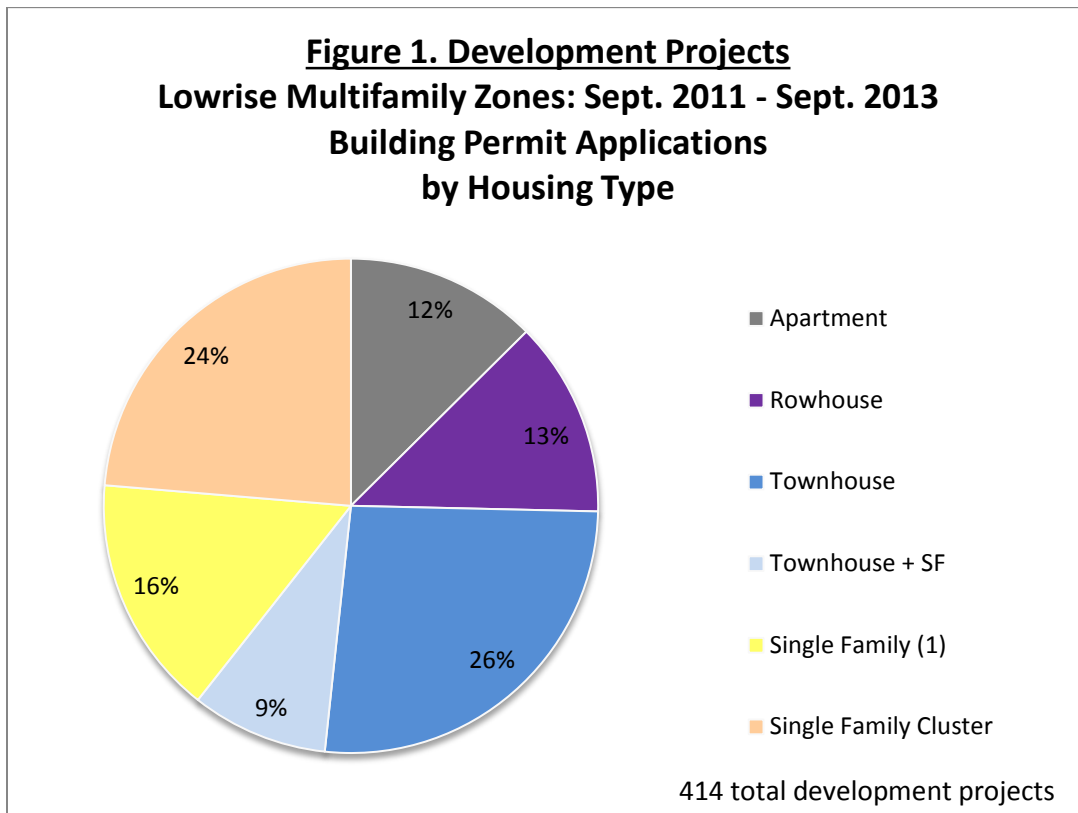
- LR3 
- LR2 
- LR1 

**Urban Centers and
Urban Villages.** 
(Except M/ICs)



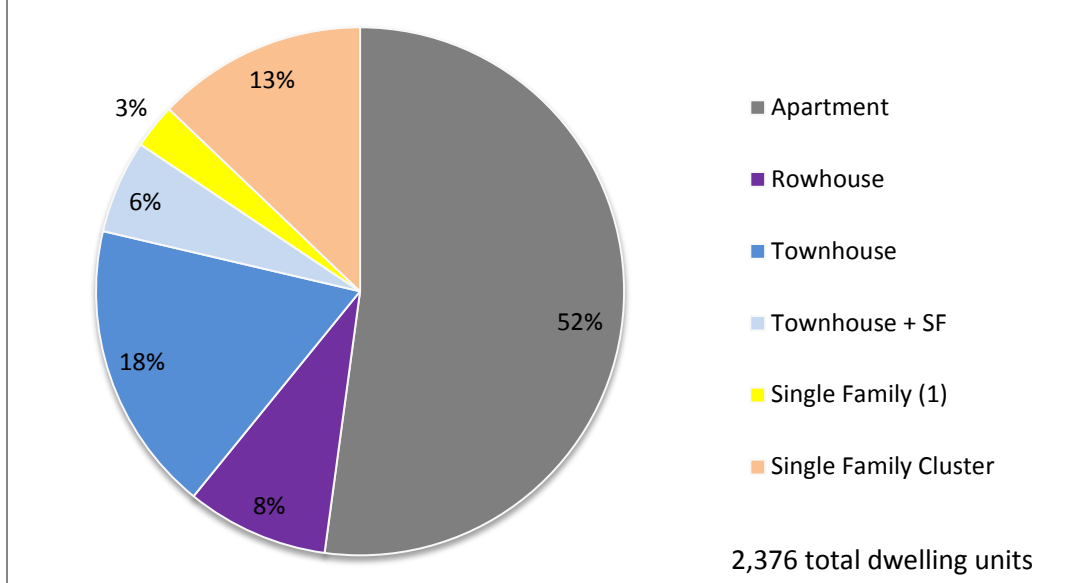
3.2 Summary of Development Activity in all Lowrise Multifamily Zones

For context, it is important to review the full range of development that has occurred in the lowrise zones since the major 2010 code update in order to understand whether the overall objectives of the 2010 code update are being met. We examined two years of building permit application data between September of 2011 (5 months after the new code went into effect) and September of 2013. The analysis below shows how many projects and housing units were permitted and in what housing types (townhouse, rowhouse, apartment, etc.) and is summarized in the charts and discussion below.



Single Family (1) refers to a project that consisted of the addition of one single family structure (not a cluster of single family structures). This includes addition of one structure on a lot which contained other previously existing residences on the lot.

**Figure 2. Dwelling Units
Lowrise Multifamily Zones: Sept. 2011 - Sept. 2013
Building Permit Applications
by Housing Type**



Single Family (1) refers to a project that consisted of the addition of one single family structure (not a cluster of single family structures). This includes addition of one structure on a lot which contained other previously existing residences on the lot.

Figures 1 and 2 above show development in all of the lowrise zones (LR1, LR2, and LR3) for the two year period by housing type. **Figure 1** displays the data by number of development projects. For these purposes, a development project is a single or contiguous construction site, such as a single apartment building or a group of townhouse structures built together on the same lot. At 26%, townhouses were the most common type of development project, followed by single-family cluster developments (24%), individual single-family home construction (16%), rowhouses (13%), and apartments (12%). 9% of projects were townhouse development combined with creation of a new single-family structure or “townhouse plus single-family.”

The data include “single-family cluster” development because we observed that clusters of several stand-alone single-family structures on a single lot are emerging as a type of development in some lowrise zones. Likewise, development of a two-unit townhouse (duplex) plus a stand-alone single-family structure is a common configuration, hence inclusion of the “townhouse plus single-family” format.

Variety of Housing Types: **Figure 1** shows that, overall, there was a broad variety of housing types produced—a key goal of the major 2010 lowrise code update. Rowhouse, townhouse, and apartment development types each comprised more than 12% of development projects.

Single-Family Development: The data also show that single-family housing types continued to be common in the lowrise multifamily zones. It’s important to consider that single-family homes were constructed in a variety of circumstances, including the addition of a single-family home on the site of an existing structure. Still, the quantity of single-family development projects (40% of total projects included at least one detached home) is notable.

Figure 2 displays the same dataset by the number of dwelling units created instead of development projects. More than half of all dwelling units in permitting during the two-year period were in apartment housing types. This is due to the fact that apartment developments contain a higher density of housing units than the other types. 18% of the dwelling units were in townhouse housing types, and 8% were in rowhouse housing types.

Apartment Development: The key finding from **Figure 2** is that a healthy percentage of dwelling units under development in the lowrise zones are now apartment type units. Prior to the 2010 major update, very little of the housing produced in the lowrise zones was conducive to rental housing stock because it was overwhelmingly townhouse development on “fee simple” platted lots. Townhouse development is almost always for-sale housing. This data shows that in the two years following the major update, more than half of the housing produced in the zones was in stacked flats more conducive to rental housing.

Figure 3: Dwelling Units by Zone
Lowrise Multifamily Zones Sept. 2011 – Sept. 2013
Building Permit Applications

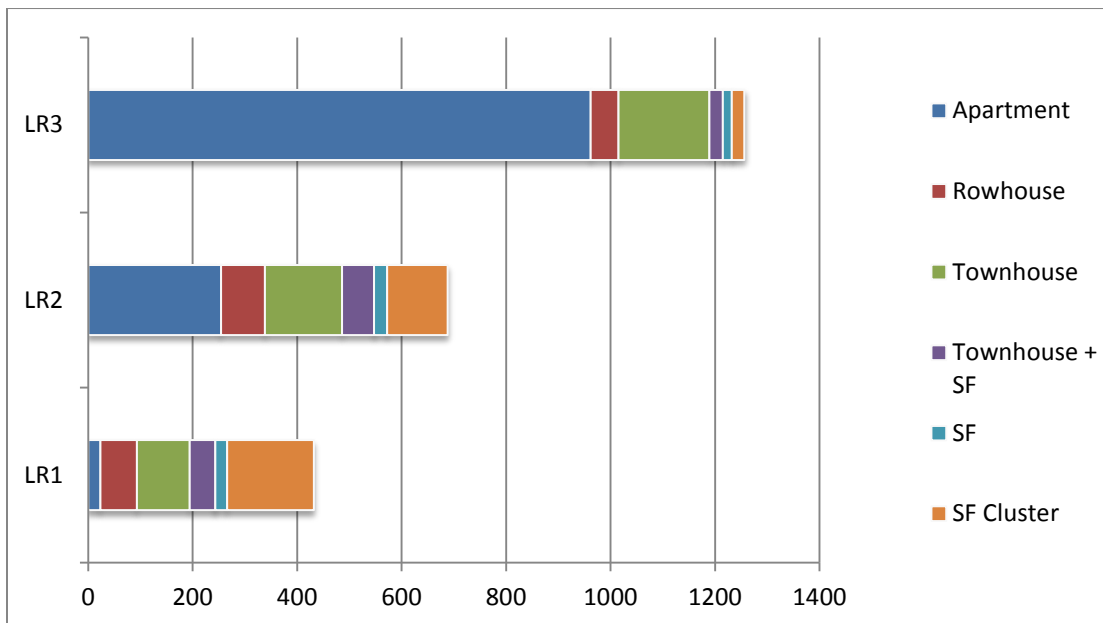


Figure 3 further breaks out the number of permitted dwelling units by the individual lowrise zones (LR1, LR2, and LR3). This figure displays both the relative quantities of housing produced in the three lowrise zones and the composition of the housing types in each individual zone.

More Dwelling Units in Higher-Intensity Zones: **Figure 3** shows that the Lowrise 3 zone is producing the most housing of the three zones on the basis of dwelling units. Of the 2,376 dwelling units in permitting, 1,256 (53%) were in the LR3 zone, 688 (29%) in the LR2 zone, and 432 (18%) in the LR1 zone. This shows that the zone intended for higher-intensity development and most commonly located within urban villages and urban centers (LR3) produced the most housing during the two-year period. Likewise, the quantity of housing produced was lowest in the lowest-intensity zone, LR1, intended for the edges of urban villages or centers and transitions to single-family designated areas.

Denser Housing Types in Higher-Intensity Zones: **Figure 3** also illustrates that most of the dwelling units in apartment housing types were located in the higher-intensity LR3 zone, and that a high percentage of development in the LR3 zone was in apartments. Of the 1,256 dwelling units permitted in LR3, 962 (77%) were in apartment housing types. On the other hand, in the lowest-intensity LR1 zone, only 23 of 432 dwelling units were in apartments (5%) and 189 dwelling units (44%) were in either single-family cluster developments or individual single-family homes. This data indicates a clear differentiation in the composition of development in the different LR zones.

Figure 5: Building Permit Applications Lowrise Zones (LR1, LR2, LR3)				
By Housing Type				
City of Seattle as a Whole				
September 2011 - September 2013				
Housing Type		Development Projects	Dwelling Units	Micros/Sleeping Rooms
Apartment	Conventional	32	1,148	-
	Micro-Housing / Cong.	20	91	705
	All Apartments	52	1,239	705
Rowhouse	Conventional	51	198	-
	Micro-Housing / Cong.	2	9	70
	All Rowhouses	53	207	70
Townhouse		109	423	
Townhouse + SF		37	136	
Single Family (1)		65	65	
Single Family Cluster		98	306	
Total All Types		414	2,376	775

Figure 5 shows permit applications for all lowrise development. It includes the amount of micro-housing or congregate residence development, which can be configured within various types of housing. Micro-housing and congregate residence formats have to do with the organization of

interior living spaces, not the overall building design, mass, and scale, which are governed by the zoning standards for each housing type. **Figure 5** shows that 20 of all 52 apartment projects in permitting included micro-housing or congregate residence formats (38%).

Conclusions

Looking at the overall dataset of two years of permit activity since the 2010 lowrise code update we can draw several conclusions. First, new housing development is fulfilling several of the core policy objectives of the 2010 multifamily code update :

- There are a variety of housing types.
- More housing that is conducive to rental housing is being produced.*
- There is differentiation between the different LR zones:
 - Denser development and more apartments are located in the LR3 zone.
 - Less dense development and more ground-related housing is in the LR1 zone.
- Development is happening in LR1, LR2, and LR3 zones and is distributed among the zones.

- *Changes in the economy after the recession of 2008 also contributed to more demand for rental housing instead of for-sale housing. But the new lowrise code facilitated apartment type construction to fulfill that demand.*

Secondly, we can make several observations about results that were not anticipated by the 2010 multifamily code update:

- A significant percentage of apartment housing types include micro-housing or congregate residences.
- There are still many detached single-family home built, especially in the LR1 zone.

3.3 Review of Permitting Plan Sets

DPD reviewed construction permit sets for detail on how development standards are being applied in plan review and how they contribute to building form. Review of the plans highlighted several key topics. In particular, some combinations of incentives led to outcomes that were not unanticipated at the time of the 2010 code update.

While we considered a large number of plan sets, we identified the sample shown in **Figure 6** as a subset that highlights certain key issues. We refer to this sample of projects throughout this report to inform the discussion of issues and unexpected outcomes.

Figure 6

Sample Lowrise Development Projects that Highlight Key Issues and Unexpected Outcomes

	Project Address	Project Description
<i>Apartment developments in the LR3 zone in urban villages and centers</i>		
1.	2371 Franklin Ave. E.	An apartment development in the LR3 zone containing micro-housing, totaling 39 micros. No parking.
2.	1720 & 1728 E. Olive St.	An apartment development in the LR3 zone containing micro-housing, totaling 54 micros. No parking.
3.	1305 E. Mercer St.	An apartment development in the LR3 zone containing a congregate residence with 56 sleeping rooms. No parking.
4.	4029 7 th Ave. NE	An apartment development in the LR3 zone containing 75 studio apartments. No parking.
5.	123 18 th Ave. E.	An apartment development in the LR3 zone containing 67 apartment units and 36 vehicle parking spaces.
6.	1814 12 th Ave. S.	An apartment development in the LR3 zone containing 22 apartment units and 12 vehicle parking spaces.
<i>Rowhouse developments</i>		
7.	1730 NW 60 th St.	A 4-unit rowhouse development in the LR1 zone.
8.	4463-69 Woodland Park Ave. N.	A 7-unit rowhouse development in the LR1 zone.
9.	418 NW Market St.	4-unit rowhouse development in the LR2 zone.
<i>Lowrise 1 townhouse/rowhouse subdivision developments</i>		
10.	1510 NW 63 rd St.	A 4-unit development in the LR1 zone.
11.	1758 NW 64 th St.	A 4-unit development in the LR1 zone.
12.	2242 NW 62 nd St.	A 4-unit development in the LR1 zone.

The sample projects in **Figure 6** are grouped because they illustrate different key issues. The first 6 projects in the table relate to apartment type developments in the Lowrise 3 zone within urban villages and centers. Because this is the only development type that can access the 40' height limit, DPD has identified that these projects have the most significant scale and context issues (see also Recommendations). The three rowhouse projects identified illustrate key issues specific to rowhouse forms of development, particularly setbacks. The final three projects identified illustrate the key issue of allowable density specifically in the LR1 zone.

Lowrise 3 Apartments

First, we address apartment development in the LR3 zone within urban villages and urban centers. As noted, only these projects have access to a 40' height limit, instead of the 30' limit allowed for most other circumstances. Apartments outside of urban villages and urban centers have the 30' height limit, as do all the other types of housing (townhouse, rowhouse), whether inside or outside of villages or centers. All of the sample projects took advantage of the 40' limit. In addition, these projects took advantage of certain exceptions or incentives related to allowable height or allowable Floor Area Ratio (FAR). The exceptions and incentives, and their combination, were identified as key issues.

Figure 7 below lists five key issue exceptions or incentives and indicates which of the sample projects used them.

Figure 7
Sample Lowrise 3 (LR3) Zone Developments Projects
Summary of Incentives and Exemptions Used

	+4' height allowance for partially below-grade story	FAR exemption for partially below-grade story	FAR exemption for exterior corridors and breezeways	+4' allowance for clerestory	Loft space not included in FAR
2371 Franklin Ave. E.	Yes	Yes	-	Yes	Yes
1720 & 1728 E. Olive Way	-	-	-	Yes	Yes
1305 E. Mercer St.	Yes	Yes	-	Yes	Yes
4029 7 th Ave. NE	Yes	Yes	Yes	-	-
123 18 th Ave. E.	-	Yes	Yes	-	-
1814 12 th Ave. S.	-	Yes	Yes	-	-

Partially Below-Grade Story: +4' Height Allowance

Section 23.45.514.F of the lowrise code allows for an additional 4' of height for certain buildings that include a partially below-grade story. The intent of this provision was twofold. First, it sought to raise the first floor of the building up from street level to provide privacy from passersby on the sidewalk. Second, it sought to emulate the form of traditional lowrise developments, such as popular “brownstone” buildings in cities like New York and Boston. The provision also intended to encourage below-grade parking (instead of surface parking) and more affordable living spaces in a daylight basement portion of the building.

This +4' height allowance is available only in certain conditions:

- Only apartments in LR2 zones and all residential uses in LR3 zones can access the 4' additional height allowance.
- It does not apply to portions of lots within 50 feet of a single-family zoned lot.
- The number of stories above the partially below-grade story is limited to three for residential uses with a 30' height limit and four with a 40' height limit.
- The story above the partially below-grade story must be at least 18” above the elevation of the street, unless waived to accommodate units accessible to the disabled or elderly.
- The average height of the exterior façades of the below-grade portion of the story cannot exceed 4', measured from existing or finished grade, whichever is lower.

- It cannot be used with shed or butterfly roofs.

Findings: (See also plan set images on following pages)

- Three of the six LR3 apartment in the sample used the +4' height allowance for a partially below-grade story.
- Two of these three buildings were able to include tall loft spaces in one or more upper stories of the building.
- All sample buildings using the allowance appear to have five stories from the exterior as viewed from one or more angles.
- In the following three examples, the highest visible façade heights on the downhill side of slopes were 54'4", 56'9", and approximately 50' feet, as explained on pages 19-21.

Figure 9
1305 E. Mercer St.—Plan Set Elevation Drawing

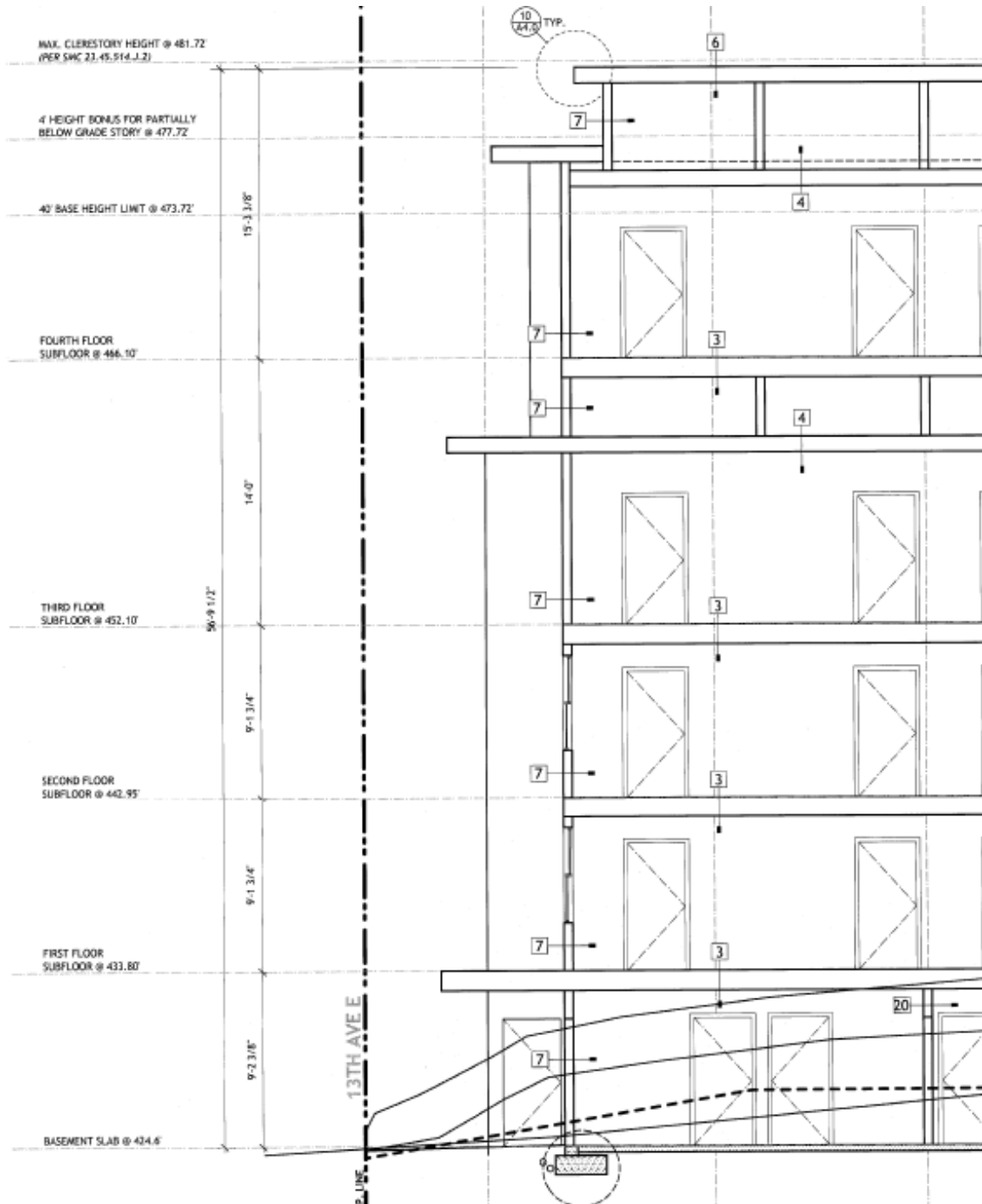
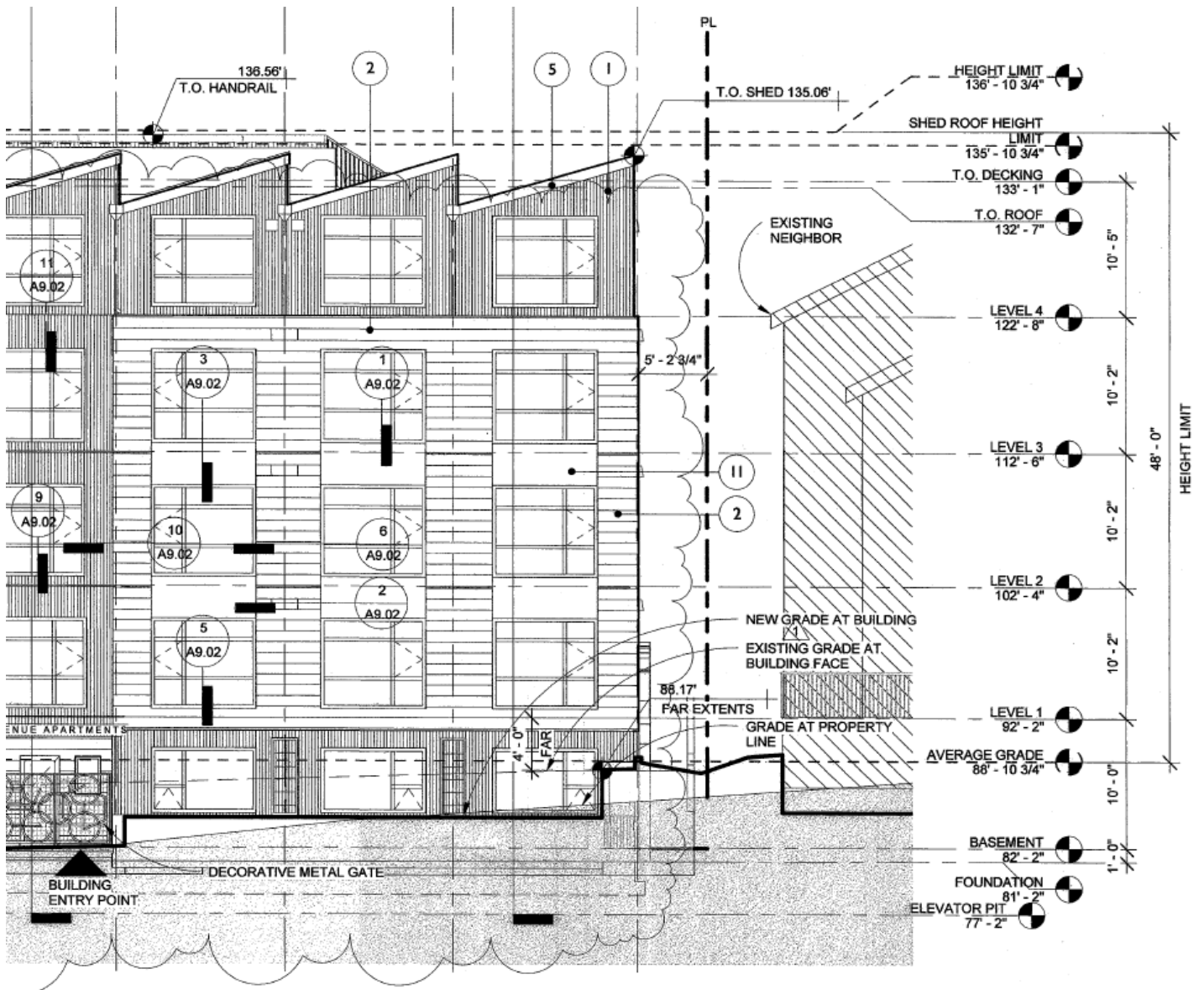


Figure 9 also shows a base height limit of 40' and an additional 4' height allowance for a partially below-grade story. With the 4' allowance and other factors on this sloping site, the downhill façade has a maximum exposed height of 56'9" to the top of the clerestory. It is also noteworthy that the top two floors have heights of 14' and 15' 3/8", and both contain loft space.

Figure 10
4029 7th Ave. NE—Plan Set Elevation



In **Figure 10** above, the height limit of 48' reflects the base height limit of 40' plus a 4' allowance for the partially below-grade story and a 4' allowance for shed roof structures. This results in a downhill façade with a maximum exposed height of over 50' to the top of the roof.

Partially Below-Grade Story: FAR Exemption

In conjunction with the +4' height limit for a partially below-grade story, SMC Section 23.45.510.E.4.a exempts the floor area included in partially below-grade stories from the FAR calculation. The intent of this provision is identical to that of the +4' height allowance. **Figure 11** quantifies the FAR exempted in partially below-grade stories for the sample projects. FAR diagrams from some of the sample plan sets are below.

Findings:

- Five of the six LR3 apartment samples used the partially below-grade floor area exemption.
- The quantity of exempted floor area varies from around 5% to 19% of the building's total floor area (see Figure 11 below).
- Two examples (2371 Franklin Ave. E. and 1305 E. Mercer St.) have an entire floor of the building exempted.
- Three of the buildings that used the exemption featured two or three studio units and storage areas in the exempted floor area.
- The two micro-housing projects that used the exemption most extensively included six and seven sleeping rooms or micros within the exempted area, respectively.

FAR Exemption for Exterior Stairs and Breezeways

In lowrise and other zones, floor area in exterior stairs, hallways, and breezeways is not counted towards chargeable floor area or FAR. Exterior corridors are attractive due to the size and scale of lowrise development. In some apartment buildings, corridors provided as exterior space have increased the buildable floor area as much as 15-20%. This was not the intent of the larger FAR allowances for apartments in the code update . **Figure 11** shows the amount of the floor area not counted towards chargeable FAR for the sample projects. We have provided FAR diagrams from some of the sample plan sets to illustrate this practice.

Findings:

- Three of the six LR3 apartment samples had exterior corridors and circulation that did not count towards chargeable FAR.
- The three conventional apartment buildings in the sample all had exterior corridors, while the three micro-housing examples did not.
- In the three projects that used the exemption, 15-27% of the building's total floor did not count in FAR.

Figure 11
Sample Lowrise (LR3) Apartment Developments
Exempted Floor Area for Partially Below-Grade Story & Floor Area of Exterior Corridors and Breezeways

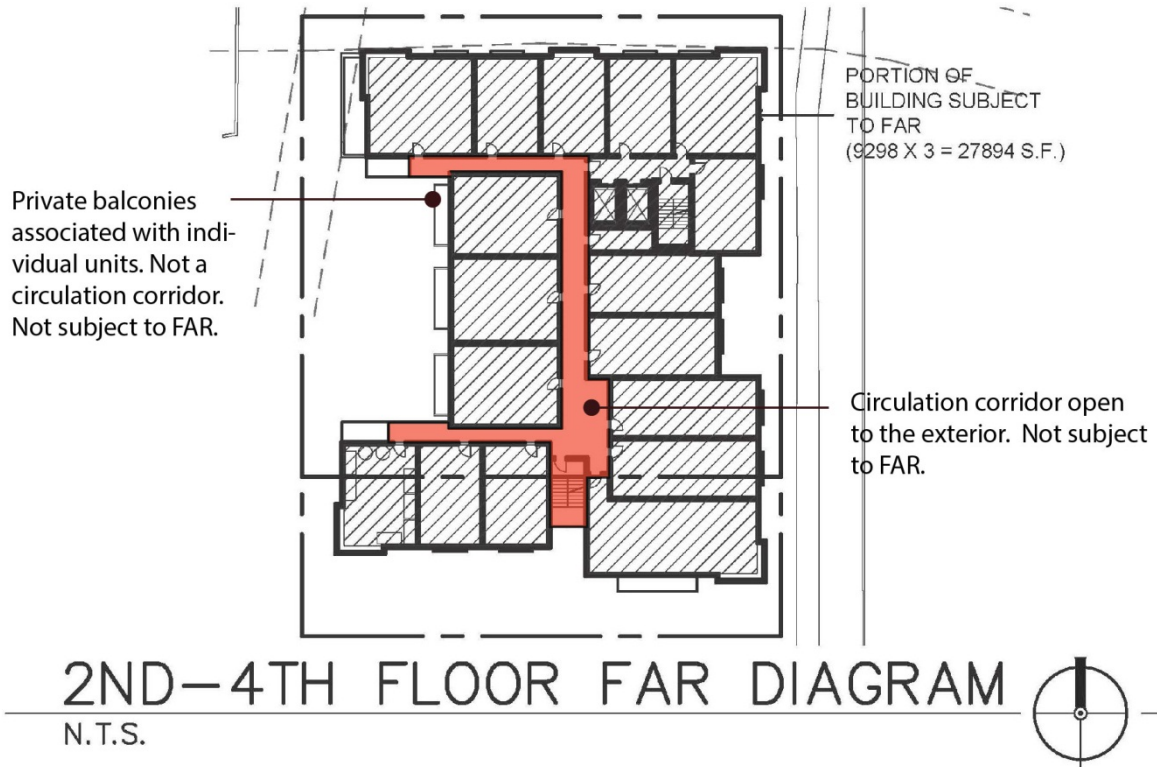
	Eastlake	Capitol Hill	Capitol Hill	U. District	Capitol Hill	Beacon Hill
	2371 Franklin Ave. E.	1720 & 1728 E. Olive	1305 E. Mercer	4033 7th Ave. NE.	123 18th Ave. E.	1814 12th Ave. S.
Total lot and building area.						
Lot Size	4,400	7,205	6,014	10,695	18,672	7,201
Maximum Floor Area @ 2.0 FAR	8,800	14,410	12,028	21,390	37,344	14,402
Total All Gross Floor Area	10,855	14,395	14,228	30,649	47,156	17,717
Total Charged Floor Area	8,763	14,395	11,969	21,377	36,604	14,270
Amount exempted partially below grade floor area (non-parking).						
Exempt Partially Below Grade Floor Area	2,092	0	2,259	1,597	2,315	827
Percentage of Total Floor Area Exempted	19.3%	0.0%	15.9%	5.2%	4.9%	4.7%
Exempted Basement Area Contents	Common area, 7 sleeping rooms, elevator mechanical room.	None	Laundry room, small kitchen, 6 micros.	Storage. A portion of 2 studio units, and amenity area.	2 studio units. 1 1BR unit. Storage and parking.	2 studio units. And storage area.
Amount exempted exterior circulation.						
Exempt Exterior Circulation	None	None	None	6,137	12,867	2,619
Percentage of Total Floor Area Exempted	0.0%	0.0%	0.0%	20.0%	27.3%	14.8%

Figure 11 shows the total amount of gross floor area in each building. This includes the amount of floor area in the entire structure 1) in partially below-grade stories exempted from the FAR calculation and 2) in exterior corridors or breezeways not counted in FAR. The figure also shows the “Total Charged Floor Area,” the amount actually counted against FAR in plan reviews.

The figure specifies for each sample project the amount of floor area in a partially below-grade story that was exempted from FAR and calculates this area as a percentage of the building’s total gross floor area. A note describes what each partially below-grade story contains. The figure also measures floor area of exterior circulation corridors in absolute terms and as a percentage of total gross floor area.

These calculations indicate the magnitude of the floor area increases we are seeing through existing code provisions. The quantities also show the extent to which removing these code provisions could potentially reduce overall buildable floor area in specific instances.

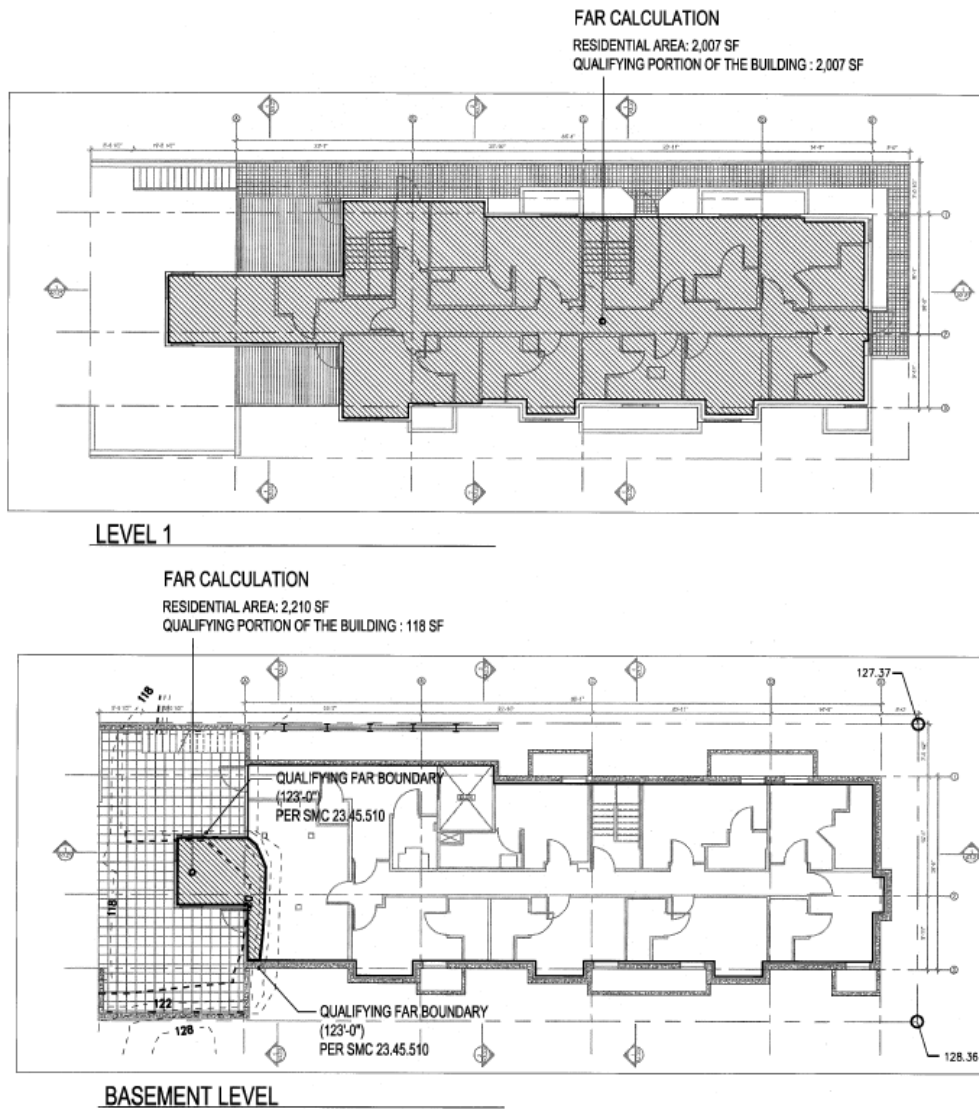
Figure 12
Sample Lowrise (LR3) Apartment Development
123 18th Ave. E.—Example Floor Area Diagram



In **Figure 12**, the hatched portion of the building is floor area that counts against the FAR maximum. All of the building's circulation corridors (highlighted in red) are left open to the exterior and therefore don't count against the FAR limit. This allows the developer to maximize the amount of allowable floor area allocated to apartment units. Since the corridors are additional to that amount, the configuration allows for a larger overall building than could be achieved if the FAR in exterior corridors contributed to the FAR limit.

We should also note that private balconies associated with individual units are not subject to FAR either. However, we do not believe these individual private balconies contribute significantly to increasing the building's floor area beyond expected amounts.

Figure 13
Sample Lowrise (LR3) Apartment Development
2371 Franklin Ave. E.—Example FAR Diagram



Note: In **Figure 13**, the hatched portion of the building is floor area that counts against the FAR maximum. The level 1 floor plan (hatched) is above grade, so its floor area counts against the FAR maximum. The basement level (not hatched), however, which contains seven micros in one dwelling unit, is partially below-grade and thus does not count against the FAR maximum.

Clerestory Rooftop Features: +4' Height Allowance

Pursuant to code subsection 23.45.514.J, various rooftop features can extend above the allowed height limit. While most architectural rooftop features, such as dormers on a sloped roof, are limited to a percentage of the roof, this was not included as a provision for clerestories. As a result, some clerestories add useable interior space in the buildings when adding a clerestory to the roof.

Figures 8 and 9 on pages 18-19 show how the 4' height allowance for a clerestory has been used in conjunction with +4' partially below-grade floor allowance. **Figure 14** below illustrates the use of the clerestory allowance without the +4' partially below-grade story allowance.

Findings: (See also plan set images on following pages)

- Three of the six LR3 apartment samples used the +4' height allowance for clerestories.
- All three of the buildings using the clerestory height exception included tall loft spaces on the top story of the building.
- All sample buildings using the clerestory provision appear to have five stories from the exterior as viewed from one or more angles.
- The highest visible façade heights on the downhill side of slopes in the three examples were 54'4", 56'9", and 44' feet.

Figure 14
Sample Lowrise (LR3) Apartment Development
1720 & 1728 E. Olive St. +4' Height Allowance for Clerestory Example

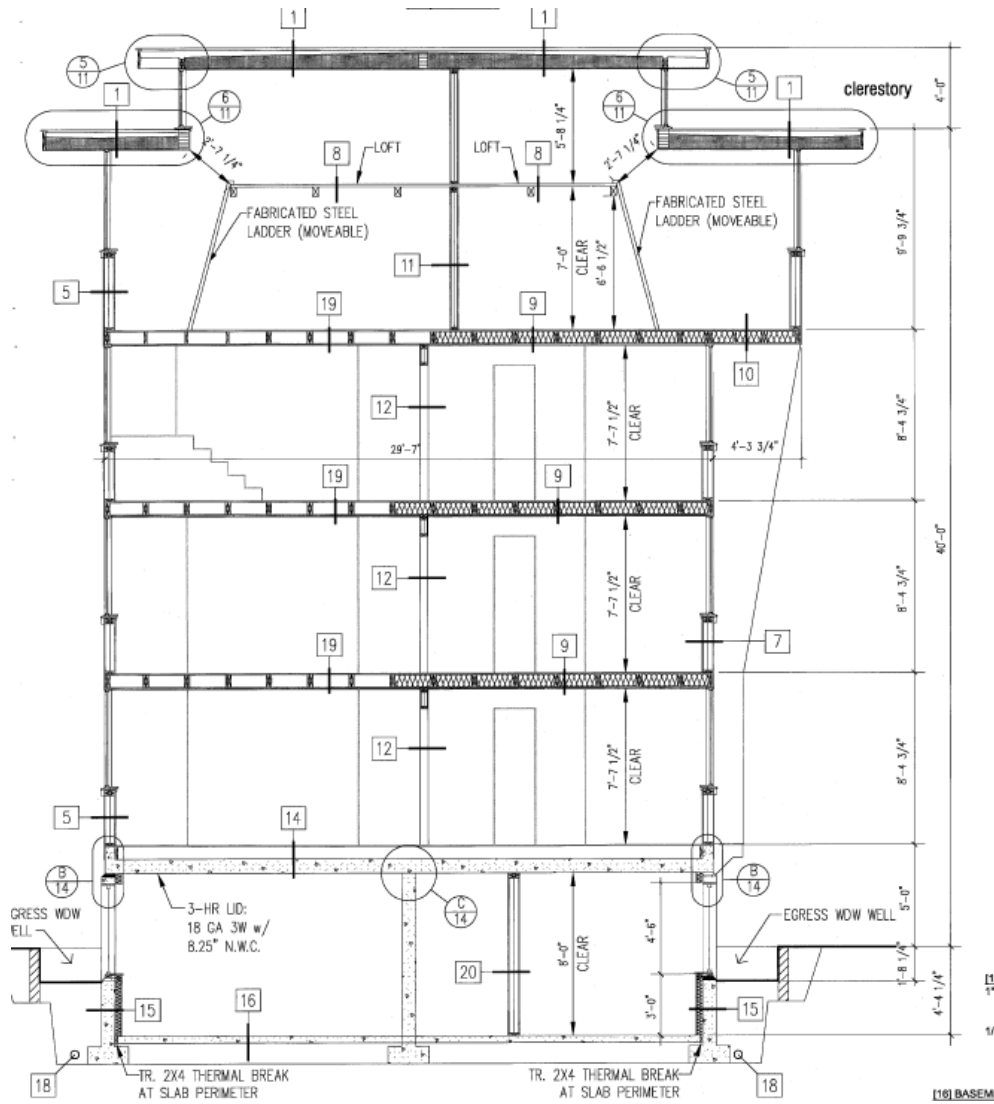


Figure 14 identifies a 4' height allowance for a clerestory roof top feature. The drawing also shows a loft space on the top floor accessible by a fabricated steel ladder. Inclusion of the clerestory facilitates the additional useable space contained within the loft. The loft space, has a clearance height of 5' 8 1/4".

Loft Space Not Included in FAR

As seen in Figure 14 above, some upper story units feature loft spaces. The minimum ceiling height for habitable space in the building code is 7', or 6' 6" clear for beams. Spaces with ceiling heights less than that can be included in a building as storage spaces. However, it appears that some less than full height spaces are being used in practice as sleeping lofts, which has the effect of increasing usable space in the building in a way that was not expected at the time of the 2010 update.

Rowhouse Development: Required Setbacks

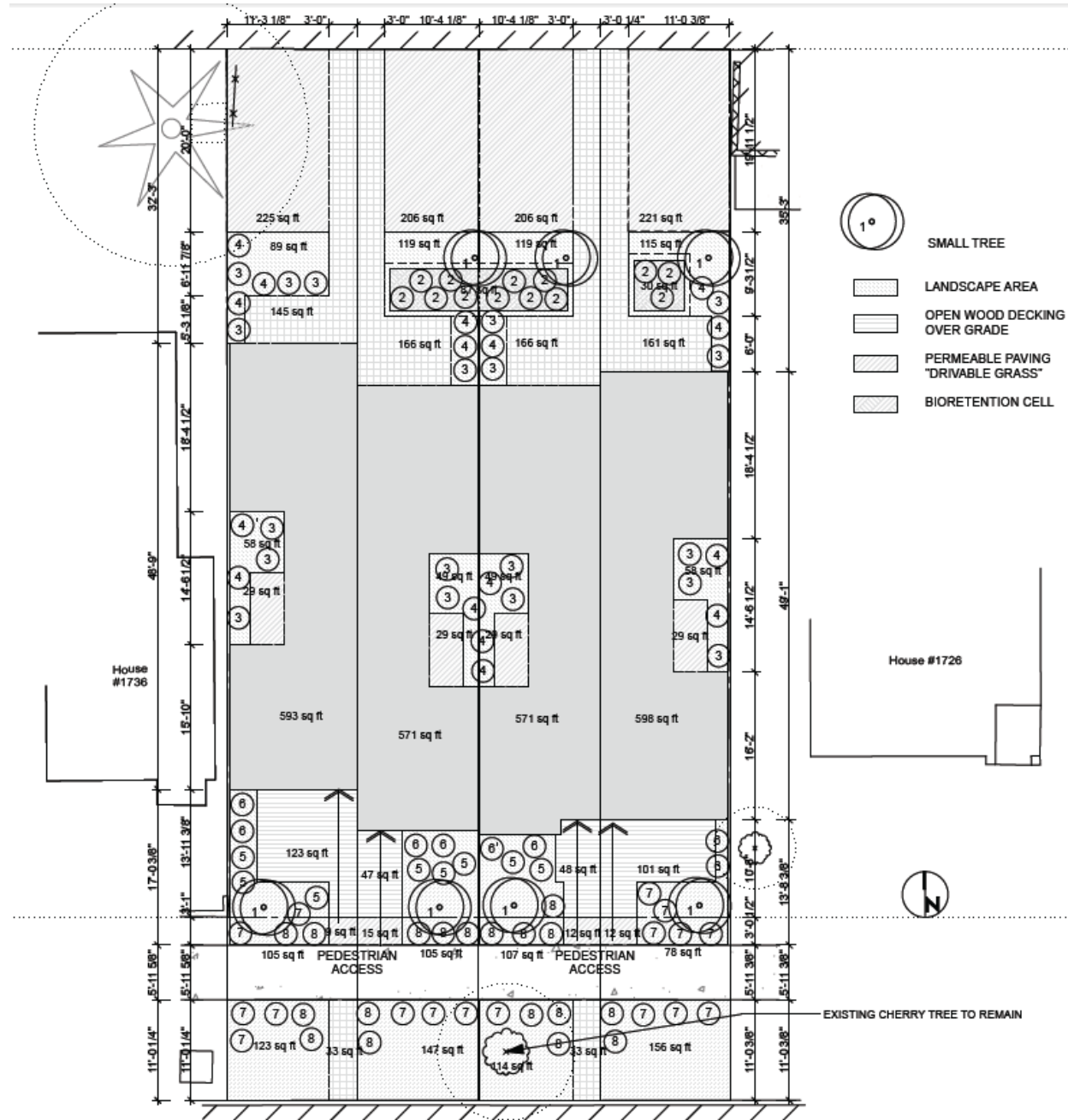
The allowance for rowhouses to be built to the side lot line is a key issue related to the rowhouse housing type. The rowhouse type most commonly occurs in Lowrise 1 and Lowrise 2 zones. We reviewed the plan sets for three sample projects. The specific issue identified for rowhouses is the allowance—only for this housing type—for a 0' side setback. The intention of this provision in the 2010 multifamily code update was to encourage the rowhouse format of housing as an alternative to townhouse development. Rowhouses differ from townhouses in that only one row of units, without another set of units behind it, is positioned on the site, and all units directly face the street. The 2010 code update sought to encourage this format as an alternative housing type observed in other cities.

The 0' side setback is allowed except where adjacent to a single-family zoned lot. The current code, allows a 0' side setback if next to a single-family home that is on a multifamily zoned lot. We heard concerns about the adjacency impacts of a rowhouse development with minimal side setback on abutting neighbor property, including access for maintaining side walls of the existing or new building. In Figures 15-17, three plan set examples of rowhouses show how allowable side setbacks may be used.

Findings:

- Two of the three examples are on corner lots, a common type of lot for rowhouses.
- All three projects used the minimal side setback allowance, with at least one side setback of less than 2'.
- Not all side setbacks were very small. One example projects included a 7' side setback where it was not required.
- The rowhouse sidewalls with narrow setbacks do not have extensive windows or façade treatments due to building code regulations.

Figure 15
Sample Rowhouse Development
1730 NW 60th St.



This example is in a midblock location and includes a 0' side setback on both the east and west sides of the site. The image shows that the width of the rowhouses is as narrow as 13' 4 1/8". The width constraint on the site requires that side setbacks be minimal in order to fit the planned number of units. The plan also shows the proximity of the side units to existing homes on adjacent lots. The house to the west (left) is approximately 3' from the property line, and the house to the east (right) is approximately 10' from the property line.

Figure 16
Sample Rowhouse Development
4463-69 Woodland Park Ave. N.

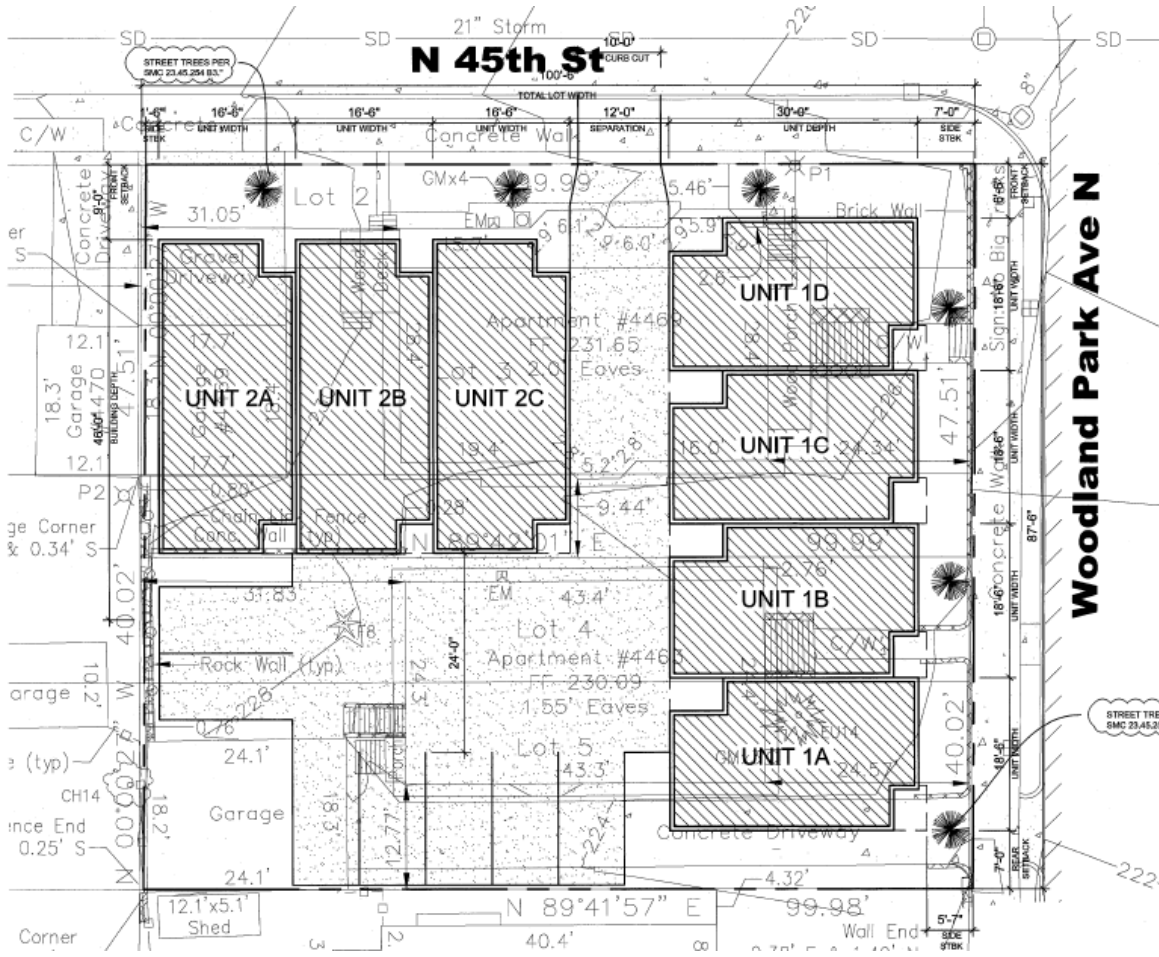


Figure 16 shows a rowhouse development on a corner lot. The example includes a 1'4" side setback the west side of the site adjacent to a garage associated with an existing single-family home. The south side has a 7' setback, which was not required by code. (Photographs of this project are included in section 3.4.)

Figure 17
Sample Rowhouse Development
1730 NW 60th St.

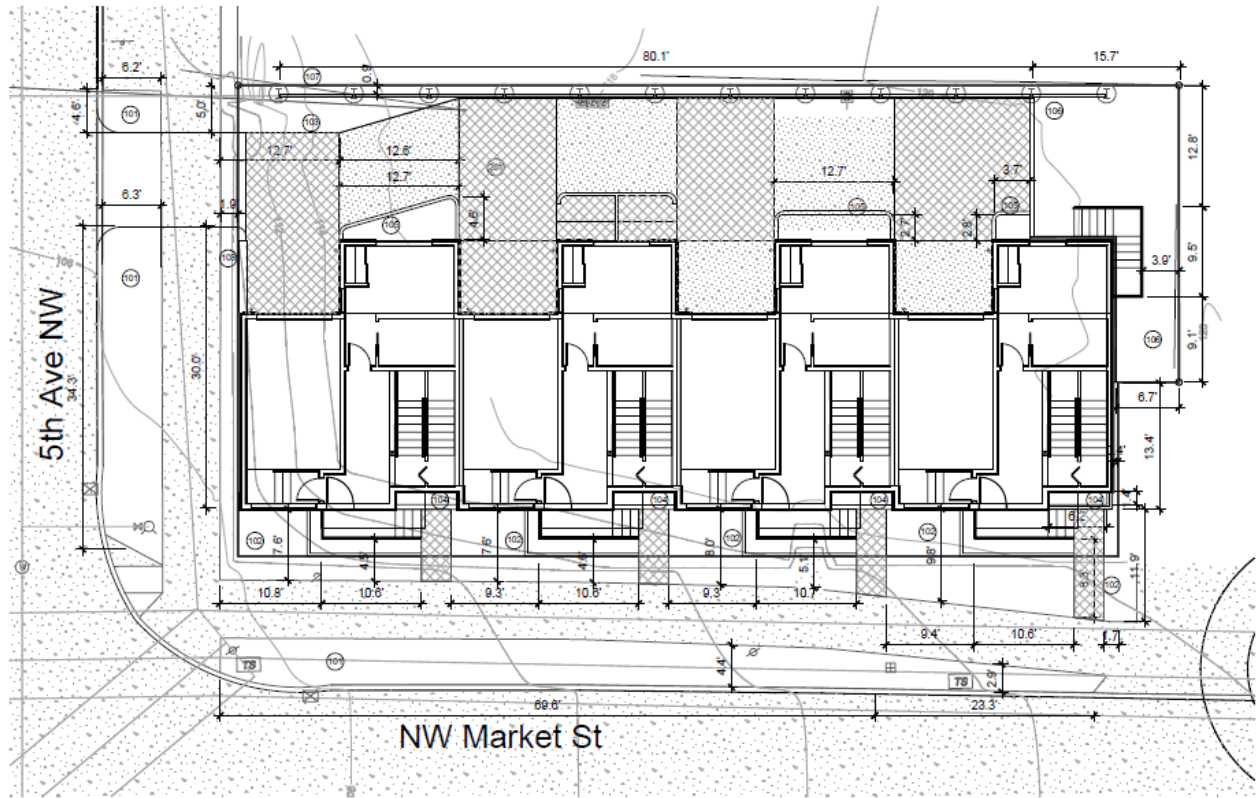


Figure 17 is also a rowhouse development on a corner lot. The example includes a 1' side setback on the west side of the site adjacent to 5th Ave. NW. On the east side of the site, the setback varies because of a jog in the lot. About half of the building is set back 3', the other half over 6'. (Photographs of this project are included in section 3.4)

Lowrise 1 Zone Allowable Density

An unexpected form of development occurs in the LR1 zone due to subdivision of single lots to take advantage of rounding practices. Subdivision of small lots into smaller pieces has also led to the use of the rowhouse type in a manner not anticipated during the 2010 multifamily code update. The practice is described further below and illustrated in three project examples.

A commonly platted lot in a lowrise 1 zone is 5,000 sf. The density limit for townhouses in the LR1 zone is one unit per 1,600 sf. Since $5,000/1,600$ equals 3.125, three townhouses are allowed on a typical 5,000 sf lot. But because density rounding provisions in the code allow for a fraction of dwelling units greater than 0.5 to be rounded up to the next whole number, some builders have first divided 5,000 sf parcels into 2,500 sf (or similarly sized) portions. $2,500 / 1,600$ equals 1.5625. Therefore, two townhouses could be allowed on the 2,500 sf lot, allowing for a total of four townhouses on the two half-lots together.

In a related practice, some builders have divided parcels into two portions, a front street-facing lot and a back lot. If the front lot is sized 2,399 sf or smaller and divided by 1,600 sf, the resulting fraction is less than 1.5, so two townhouses would not be allowed. In some cases, builders have located a pair of rowhouses on a front lot under 2,400 sf. Since rowhouses do not have a density limit, they are not subject to the one unit per 1,600 sf requirement. The rowhouse type was not envisioned as a configuration with a set of townhouse units behind rowhouse units. However, since development standards are applied to the platted lot only (in this case a front street-facing lot) rowhouses located on that lot are allowable.

The examples below illustrate versions of these practices.

Findings:

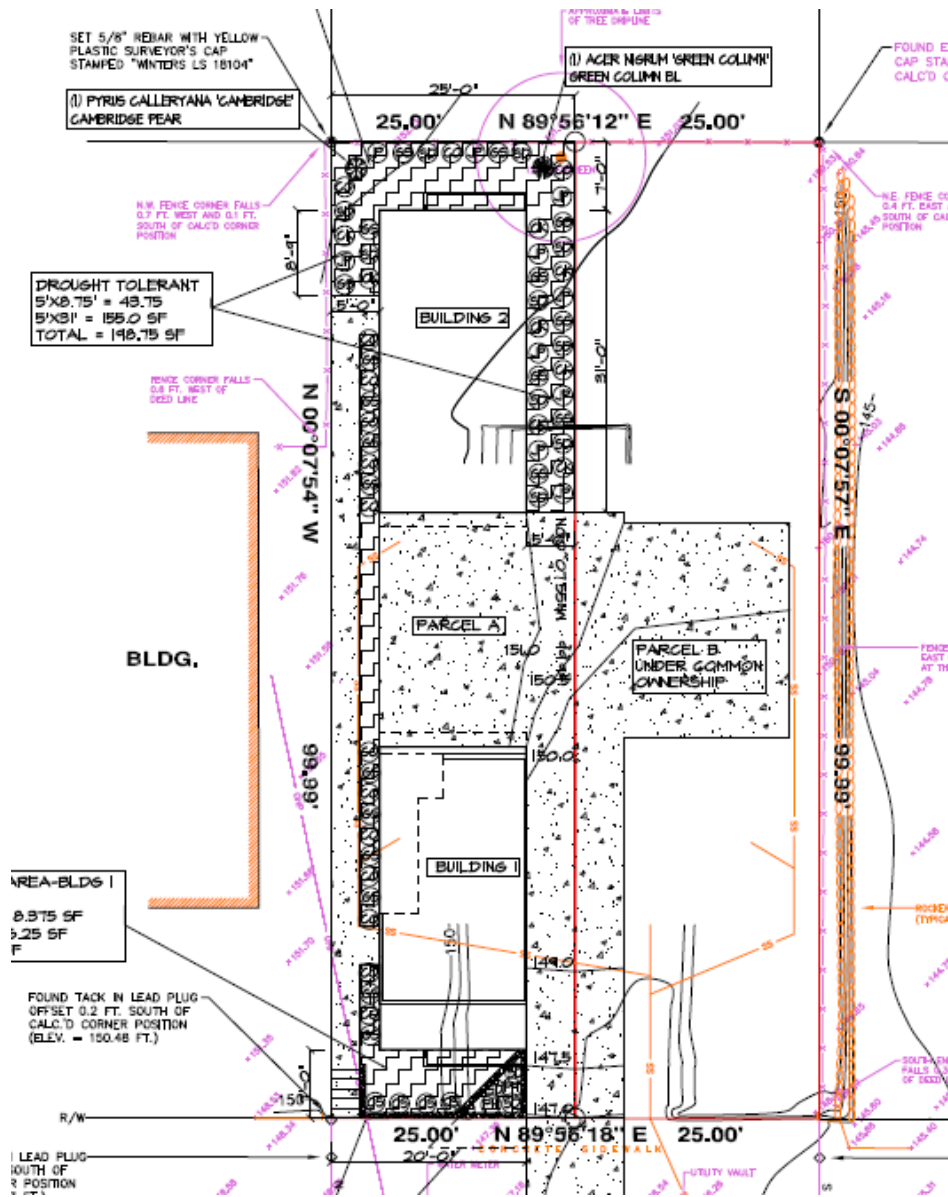
- In all three examples, four townhouses or townhouse-like structures are being located on a commonly platted 5,000 sf lot.
- Two of the sample projects (1510 NW 63rd St. and 1758 NW 64th St.) are identical site plans on different lots several blocks apart, indicating replication of a formula design.
- At 2242 NW 62nd St., the front set of units is permitted as a rowhouse structure but does not have the form of rowhouse development intended with the 2010 code update.

Figure 18

Sample LR1 Development

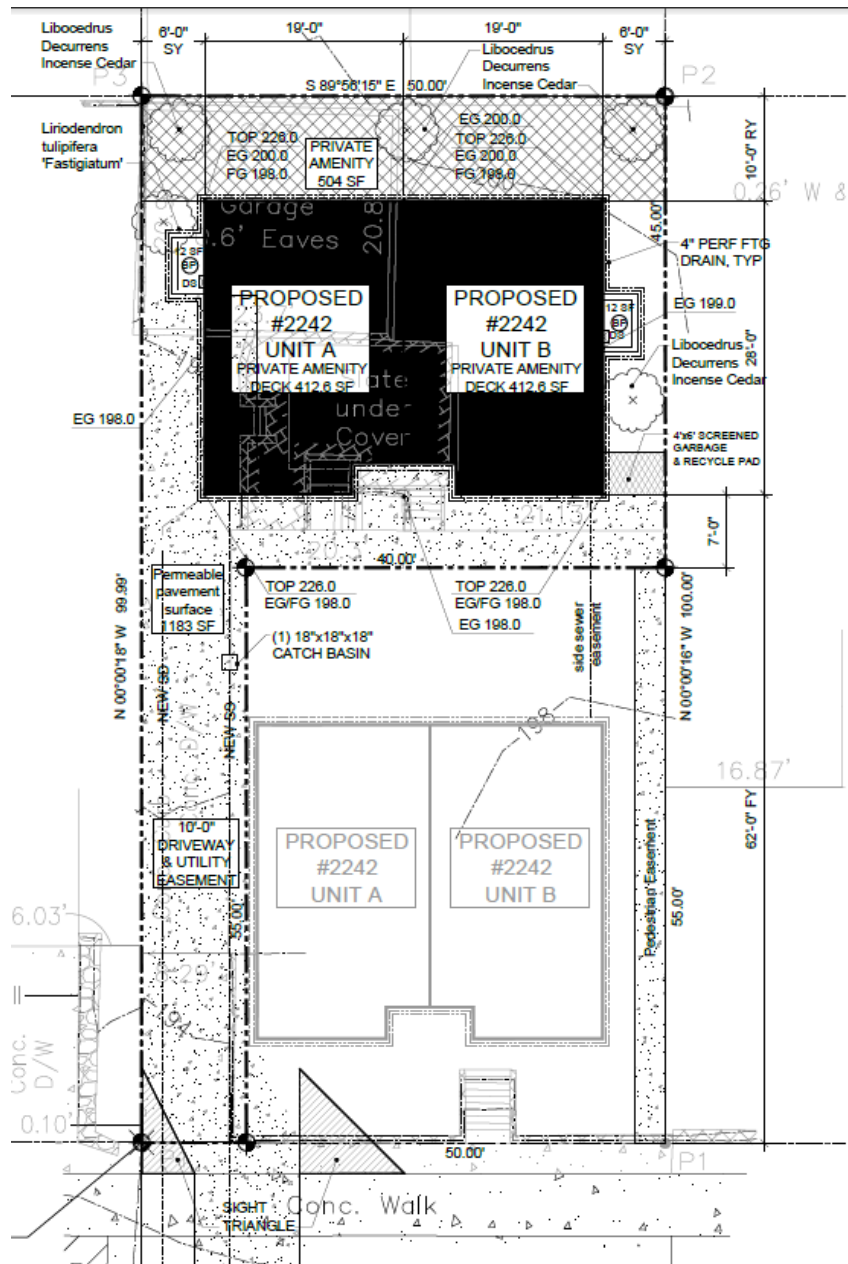
1510 NW 63rd St.—Lowrise 1 Density Example

(Though omitted to avoid redundancy, 1758 NW 64th St. is identical to this site plan.)



The lot in **Figure 18** was a typical 50' wide by 100' deep 5,000 sf platted lot. The plan shows how the lot was divided in two 2,500 sf halves that are 25' wide by 100' deep. The two standalone structures on the half identified as Parcel A meet the density requirement due to rounding. Standalone structures are technically single-family structures but are subject to the townhouse development standards in lowrise zones.

Figure 19
Sample LR1 Development
2242 NW 62nd St.—Lowrise 1 Density Example



In **Figure 19**, a typical 50' wide by 100' deep 5,000 sf platted lot was divided into a 2,800 sf flag lot and a smaller 2,200 sf front lot. The plan shows two townhouses on the flag lot that meet the density requirement. The two attached units on the separate 2,200 sf lot are rowhouses not subject to the one unit per 1,600 sf density limit.

3.4 Direct Observation of Built or Under-Construction Projects

The following pages include photographs of the aforementioned sample projects. Following each photograph, we note observations of the key issues.

Figure 20
Sample Apartment LR3
2371 Franklin Ave. E.

Project is under construction at the time of this photograph.



Top left: From Franklin Ave. Top right: from alley. Bottom: Franklin Ave. streetscape.

Project Information

- The project uses the additional 4' height allowance for a partially below-grade story.
- 19% of the building's total floor area is exempted from FAR as a partially below-grade story.
- The project includes a butterfly roof that is allowed as a height exception. (However, changes to code in adopted in 2013 no longer allow shed roofs to be used in combination with the +4' height allowance for a partially below-grade story.)
- The project contains micro-housing.
- The project did not go through design review but would have been required to undergo design review if the proposed Council Bill 118067 containing micro-housing regulations were in place at the time.
- The highest exposed façade height is 54'4" and is facing the alley.
- The project does not include parking.

Context & Design

- Neighboring structures are under-developed for a Lowrise 3 zone, and the area has been zoned for multifamily development for over 30 years.
- The project is notably larger than adjacent existing structures, where single-family structures still are present.
- The three adjacent lots to the south (foreground in the bottom photograph on the preceding page) have permits in for the development of a 50-60 unit apartment building with 20-45 parking spaces.
- The project casts shadows onto adjacent properties, especially to the north onto the adjacent four-unit multifamily structure.
- The project is on a sloping site, which allows the downhill façade to be the tallest. This façade faces the alley.
- The upper story of the building contains tall spaces that are up to 18' in height and include lofts.
- The wing-like roof form (a shed roof) accentuates the height of the structure.
- The partially below-grade story does not create a recognizable stoop or porch where it faces the street.
- The project makes use of four of the five "key issue" incentives or exemptions we have tracked.

Figure 21
Sample Apartment LR3
1720 & 1728 E. Olive St.



Top: from across 18th Ave. Bottom left: from within courtyard. Bottom right: from across Olive Way.

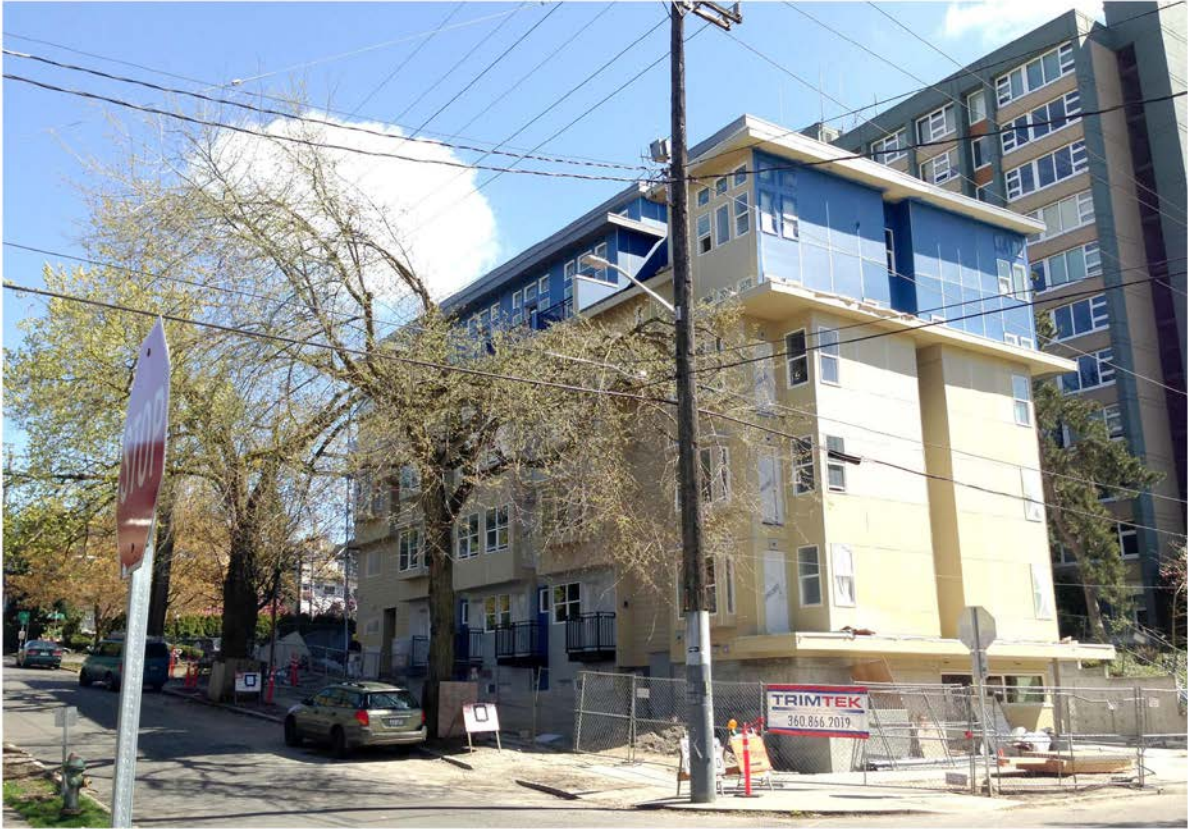
Project Information

- The project uses the additional 4' height allowance for including a clerestory.
- The project contains micro-housing.
- The project did not go through design review but would have been required to undergo design review if the proposed Council Bill containing micro-housing regulations were in place at the time.
- The highest exposed façade height is 44' from finished grade to the top of the clerestory.

Context & Design

- The project is on a corner lot and on a slightly sloping site.
- The site is bermed (the grade of the lot is higher than the sidewalk and covers a portion of the structures) and had a bermed condition prior to the development. It now has a rock wall facing 18th Ave, which makes the building appear taller from sidewalk level than it is pursuant to the applied height limit.
- The two building masses are configured at the edges of the site and an open courtyard is in the middle of the site. This has the effect of placing a tall building closest to the public street, especially along 18th Ave.
- The project is in an area that has been zoned for lowrise development for over 30 years.
- The project appears to be somewhat larger than adjacent structures to the north, which are also multifamily buildings in the LR3 zone.
- The top story extends outward on the 18th Ave façade, accentuating the building's height.
- The existing structure to the west of the site is larger than the project and was built prior to the 2010 code update.
- The project is one block from services and transit on Madison Street including a grocery store.

Figure 22
1305 E. Mercer St.
Sample Apartment LR3



Top: From corner of E. Mercer St. and 13th Ave. Bottom left: From 13th Ave. Bottom right: Along E. Mercer St.

Project Information

- The project includes an additional 4' of height allowance for clerestory.
- About 16% of the building's total floor area is exempted from FAR as a partially below-grade story.
- The project contains a congregate residence arrangement.
- The project did not go through design review but would have been required to undergo design review if the proposed Council Bill 118067 containing micro-housing regulations were in place at the time.
- The highest exposed façade is approximately 56'9" on the downhill side, including the clerestory and partially below-grade story exposed at this frontage.
- The top two stories of the building include tall spaces, 14'-15' high, which include lofts.

Context & Design

- The project is adjacent to an existing large multifamily structure that was built in the 1970s as part of a contract rezone.
- The project is in the vicinity of other existing lowrise multifamily developments, most of which are of slightly smaller scale.
- The project is in an area that has been zoned for lowrise development for over 30 years.
- The project used four of the five "key issue" incentives or exceptions we have tracked.
- At the downhill side of the slope, the partially below-grade story is fully exposed.

Figure 23
4029 7th Ave. NE
Sample Apartment LR3

The project was under construction at the time of this photo.



Top: From across 7th Ave. NE. Bottom left: Building rear from 8th Ave. NE. Bottom right: exterior stairways and circulation.

Project Information

- The project includes 4' height allowances for a partially below-grade story and for shed roof features. (2013 legislation already made changes that would not allow the use of shed roofs with the partially below-grade story).
- 5.2% of the building's total floor area is exempted from FAR due to the partially below-grade story.
- 20% of the building's total floor area is exterior corridors and breezeways and thus not included in chargeable FAR.
- The project went through design review with a design review board.

Context & Design

- The project is located in the University District, an area with a high concentration of student housing in apartment buildings.
- The building is taller than adjacent townhouse structures to the north and south.
- The building is broken into "components" because of the exterior stairs and corridors, and the components generally occupy outside edges of the site. This places building mass close to the street and neighboring structures.
- Though the largest and densest of the sample projects, the building fits into its context well, since the area is already characterized by several existing multifamily developments.

Figure 24
123 18th Ave. E.
Sample Apartment LR3

The project is not yet under construction. The photographs below show the project site. The project would replace the yellow house and the 1.5 story brick apartment building.



Top: From across 18th Ave. E. Bottom: From along E. John St.

Project Information (designed but not built)

- The project will contain 67 apartment units and 36 parking spaces.
- Exterior corridors and breezeways used for building circulation will account for over 25% of the building's total floor area and will not count against FAR.
- The project went through design review with the design review board.

Context & Design

- The project is not yet built, so it is difficult to evaluate its relationship to context or its design.
- The project would replace one large single-family home structure and one 1.5-story Tudor brick, courtyard style apartment structure. The single-family home (yellow house) is currently used as a rental home for a group of unrelated persons.
- Other four-story historic apartment buildings are in the immediate vicinity of the site. Several of these existing examples are built out directly to front and side lot lines.

Figure 25
1814 12th Ave. S.
Sample Apartment LR3

The project was under construction at the time of this photo.



From the corner of 12th Ave. S. and S. Holgate St.

Project Information

- The project includes 22 apartment units and 12 vehicle parking spaces.
- The project uses 4' height allowances for a partially below-grade story and for shed roof features. (The 2013 omnibus already made changes that would not allow the use of shed roofs with the partially below-grade story).
- 5.2% of the building's total floor area is exempted from FAR as a partially below-grade story.
- Exterior courtyards or breezeways comprise 14.8% of the building's total floor area thus are not counted against chargeable FAR.
- The project went through design review by a design review board.

Context & Design

- The project is not yet built, so it is difficult to evaluate its relationship to context or its design.
- The building is across the alley from an existing multifamily structure built in the 1970s.
- Immediately north of the site is an existing single-family home structure, but the next lot north of that home is a six-unit townhome structure constructed in 2010.
- On a corner lot, the building takes advantage of the sloping site to access views over the Duwamish lowlands and westward to Puget Sound.

Figure 26
1730 NW 60th St.
Sample Rowhouse LR1

The project was not yet under construction at the time of this photo. The photo is of the project site. The four-unit rowhouse would replace the center home.



From across NW 60th St.

Project Information

- Four rowhouse units are proposed in a Lowrise 1 zone.
- The project includes 0' side setbacks from both east and west lot lines.
- The rowhouses would be as narrow as 13' 4 1/8".
- Four parking spaces would be located behind the rowhouses and accessed via a rear alley.

Context & Design

- The area has been zoned for lowrise multifamily for over 30 years.
- The structures immediately east and the west of the project are single-family homes.
- The single-family home to the west (left in the photo) had an addition in 2006. The addition used a special provision in the lowrise zoning code that allows single-family structures to protrude into setbacks provided they are at least 3' from a side property line. The structure is 3' from the property line.
- The structure to the east (right in the photo) is approximately 10' from the property line.

Figure 27
4463-69 Woodland Park Ave. N.
Sample Rowhouse LR2



Upper left: from the corner of N 45th St. and Woodland Park Ave. N. Lower left: along Woodland Park Ave. N. Lower right: along N 45th St.

Project Information

- Seven rowhouses are located on a corner lot.
- Parking for seven vehicles is located behind the rowhouses in a surface courtyard.
- There is a 1' 4" side setback at the west lot line adjacent to the garage of a single-family home.
- There is a 7' setback at the south lot line next to an existing single-family home structure. This setback is not required since the single-family home is in a Lowrise 2 zone, but the designer included it anyway.

Context & Design

- The rowhouse design has a strong presence on the corner.
- Parking areas are largely concealed from the public streets and sidewalks.
- The majority of green factor landscaping is provided in planters and bioretention cells near the front stoops.
- The neighborhood contains a mix of multifamily apartments, condominiums, townhomes, and single-family homes. The building appears to fit well into this existing context.

Figure 28
418 NW Market St.
Sample Rowhouse LR1

Project was under construction at the time of this photo.



Top: From southwest, across NW Market St. Bottom left: from across NW Market St. showing small side setback adjacent to a garage. Bottom right: From across 5th Ave. NW.

Project Information

- Four rowhouses are located on a corner lot in a Lowrise 1 zone.
- Four parking spaces are located in “tuck-under” garages behind the rowhouses.
- A portion of the east setback is just 3” from the property line.
- The setback at the west lot line faces NW 5th Ave. but was treated as a 1’ side setback.

Context & Design

- The rowhouses face an arterial roadway and have a strong presence on a corner lot.
- The rear drive court provides a buffer to existing single-family home structures behind the rowhouses.
- The majority of the green factor landscaping will be provided in planter areas near the front stoops facing NW Market St. (The landscaping was not installed at the time of the photo.) Permeable paving in the drive court also contributes to green factor.

Figure 29
1510 NW 63rd St.



All photos from across NW 63rd St.

Project Information

- The project includes four stand-alone single-family structures.
- The lot is 5,000 sf.
- Parking is accessed between the two front structures, and each unit has tuck-under parking accessed at the center of the site.
- The project did not go through design review.

Context & Design

- One lot separates this project from commercially zoned land on 15th Ave. NW.
- The structure to the west is a single-family home.
- Similarly scaled townhouse development is located directly behind the project on NW 64th St.
- The design of the homes places walls with few openings or modulation at the side lot lines.
- Most of the amenity area for the units is located in rooftop terraces.

Figure 30
1758 NW 64th St.

The project was under construction at the time of this photo.



All photos from across NW 64th St.

Project Information

- The project includes four stand-alone single-family structures.
- The lot is 5,000 sf.
- Parking is accessed between the two front structures, and each unit has tuck-under parking accessed at the center of the site.
- The project did not go through design review.

Context & Design

- The structure to the west (left in the photo) is an existing single-family home.
- The structure to the east (right in the photo) is an existing triplex structure.
- The design of the homes places walls with few openings or modulation at the side lot lines.
- Most of the amenity area for the units is located in rooftop terraces.
- The project is directly across the street from a Boys & Girls Club and a baseball field.

Figure 30
2242 NW 62nd St.

The project was under construction at the time of this photograph.



All photos from across NW 62nd St.

Project Information

- The project includes two townhouses on the rear portion of the lot.
- The project was permitted as two rowhouses on the front portion of the lot.
- The lot is 5,000 sf.
- Each unit has tuck-under parking accessed via a central courtyard/drive court.

Context & Design

- The project is located in an area with a mix of duplexes, triplexes, and small apartment buildings.
- The structure to the east (right in the photo) is an existing duplex.
- The structure to the west (left in the photo) is an existing small apartment building.
- Most of the amenity area for the units is located in rooftop terraces.

4. Recommendations

Below are DPD's recommendations for land use code adjustments that respond to the key issues identified. The recommended actions address the items in the memo request by Sally Clark to DPD, as well as other issues identified during our analysis and conversation with community members and others. The recommendations are grouped into four major topics. Please refer to **Section 3.3 Review of Permitting Plan Sets** and **Section 3.4 Direct Observation of Built or Under-Construction Projects** for additional information and findings supporting the recommendations.

A list of the recommendations is below followed by complete descriptions.

Encourage better response to context for apartment development, particularly in Lowrise 3 zones in urban villages and urban centers.

- Eliminate the additional 4' of height allowance for a partially below-grade story for apartments.
- Eliminate the FAR exemption for a partially below-grade story for apartment housing types.

Address perceived height and scale of development on sloping sites.

- Establish new height control to limit the maximum street-facing façade height.

Adjust code provisions that allow use of clerestories and FAR calculations in unexpected ways.

- Place limits on the use of clerestories and similar features.
- Include unenclosed exterior stairs, hallways, and breezeways in chargeable FAR.
- Include the floor area of loft spaces in FAR calculation.

Address unanticipated density levels and adjacencies in the Lowrise 1 zone.

- Add a side setback requirement for rowhouse development if adjacent to other types of housing.
- Change rounding requirements for the density limits in lowrise zones.
- Add density limits for rowhouses in the LR1 zone.

Encourage better response to context for apartment development, particularly in Lowrise 3 zones in urban villages and urban centers.

Buildings that appear to be five or six stories occur only within a specific segment of lowrise development: apartments located in Lowrise 3 zones and in Urban Centers or Villages. Only under these circumstances does a 40' maximum height limit apply. The original intent of the 40' height limit for apartments was to encourage production of rental housing in the LR zones in areas

prioritized for growth. However, when combined with other allowances and exceptions, the 40' height limit resulted in buildings larger than the scale intended by the 2010 update. To address these results, we recommend the following measures to remove combinations of incentives and exemptions.

Eliminate the +4' of height allowance for a partially below-grade story for apartments:

(23.45.514.F). Currently, a +4' height allowance is available for all types of multifamily development in the LR3 zone if the building includes a partially below-grade story. The intent of this allowance was to encourage a stoop or porch condition and raise the building's first level to increase privacy. It also intended to encourage a partial basement for parking or lower-cost housing.

The proposed Ordinance would disallow the use of the +4' height allowance for apartment housing types. The proposed Ordinance would retain the +4' height allowance in the Lowrise 3 zone for townhouse and rowhouse development types. Townhouse and rowhouse types are subject to a 30' height limit not the 40' height limit available to apartment developments in the LR3 zone in urban centers and villages. In other words, the apartment developments have more height to work with than rowhouse and townhouse types, even without the allowance. In addition, the ground-related nature of townhouse and rowhouse development is more conducive to stoop and porch designs. For these reasons, we propose to retain the allowance only for rowhouse and townhouse types and only in the LR3 zone. The following table summarizes the effects of this change on total height limits in the LR3 zone.

**Figure 31 Existing Code and Proposed Ordinance
+4' Height Allowance for Partially Below-Grade Story**

Code Provision	Existing Code (23.45.514.F)	Proposed Ordinance
+4' height allowance for partially below-grade story.	<i>Inside Villages and Centers: LR3</i> <ul style="list-style-type: none"> • Apartments (40' + 4' = 44') • Rowhouse & Townhouse (30' + 4' = 34') 	<i>Inside Villages and Centers: LR3</i> <ul style="list-style-type: none"> • Apartments: <u>Remove +4' allowance</u> (40' + 0' = 40') • Rowhouse & Townhouse (30' + 4' = 34')
	<i>Outside of Villages and Centers: LR3</i> <ul style="list-style-type: none"> • Apartments (30' + 4' = 34') • Rowhouse & Townhouse (30' + 4' = 34') 	<i>Outside of Villages and Centers: LR3</i> <ul style="list-style-type: none"> • Apartments: <u>Remove +4' allowance</u> (30' + 0' = 30') • Rowhouse & Townhouse (30' + 4' = 34')

Eliminate the FAR exemption for a partially below-grade story: (SMC 23.45.510.E.4.a) Currently, floor area included in a partially below-grade story is not counted against chargeable FAR for apartment developments in all lowrise zones if the builder provides certain favorable design features. The FAR exemption is also available to rowhouse developments with certain favorable design features. Similar to the height allowance described above, the intent of this allowance was

to encourage a stoop or porch condition and raise the building’s first level to increase privacy. It was also meant to encourage use of a partial basement for parking or lower-cost housing.

The proposed Ordinance would eliminate the FAR exemption for apartment developments, but retain the exemption for rowhouse developments. As previously mentioned, rowhouses are more conducive to the porch and stoop designs this exemption intended to encourage. It is important to note that allowable FAR maximums are significantly higher for apartment developments than for the other housing types (see Figure 32 below). We find there is adequate allowable FAR to achieve development outcomes with ample rental housing in apartment structures even without the additional exemption for areas in a partially below-grade story.

Figure 32

Existing and Proposed Code Provisions

FAR exemption for partially below grade story Lowrise 3 Zone

Code Provision	Existing Code (23.45.514.F)	Proposed Ordinance
FAR exemption for partially below-grade floor area.	<p><i>Inside Villages and Centers: LR3</i></p> <ul style="list-style-type: none"> • Apartments (Max FAR 2.0* + exemption) • Rowhouse (Max FAR 1.4 + exemption) • Townhouse: no exemption (Max FAR 1.4) 	<p><i>Inside Villages and Centers: LR3</i></p> <ul style="list-style-type: none"> • Apartments: <u>remove exemption</u> (Max FAR 2.0*) • Rowhouse (Max FAR 1.4 + exemption) • Townhouse: no exemption (Max FAR 1.4)
	<p><i>Outside of Villages and Centers: LR3</i></p> <ul style="list-style-type: none"> • Apartments (Max FAR 1.6** + exemption) • Rowhouse (Max FAR 1.4* + exemption) • Townhouse: no exemption (Max FAR 1.4*) 	<p><i>Outside of Villages and Centers: LR3</i></p> <ul style="list-style-type: none"> • Apartments: <u>remove exemption</u> (Max FAR 1.6**) • Rowhouse (Max FAR 1.4* + exemption) • Townhouse: no exemption (Max FAR 1.3*)

* Is available if the building provides favorable design features regarding parking access and green building performance.

** Is available if the building provides favorable design features and is on a frequent transit street.

Based on examples cited in this report and other projects, we find that the use of these exemptions and allowance has, in general, not achieved favorable design outcomes in line with the intent. Observed apartment examples (see Sections 3 and 4 above) have not included the generous stoop or porch-like conditions envisioned in 2010. We believe that goals for slightly raised first floor levels and stoops and porches are more conducive for the ground-related housing types: rowhouses and townhouses. This is consistent with the Planning Commission’s recommendation letter from April of 2014.

Address perceived height and scale of development on sloping sites.

When the Lowrise Code was updated in 2010, the height measurement technique was changed to an average grade plane method. This results in taller facades on the downhill side of sloping sites but shorter ones on the uphill side (see appendices). The primary reason for this change was to harmonize the land use code measurement technique with the building code measurement technique, which also employs an average grade plane measurement. A second reason was that the prior technique—applying the height limit at all points along a slope—creates significant challenges to designing small-scale structures on small sites with slopes.

Despite achieving these objectives, the change to an average grade plane measurement also led to buildings that appear to have more stories or taller facades when viewed from the low side of slopes and as compared with prior development. On the downhill side of a slope, a story that is partially below grade elsewhere on the site may be fully exposed, appearing to be an additional story. This has produced buildings with the appearance from the downhill side of a slope of five (or even six) stories for some apartments in the LR3 zones (see Figures 20, 22, and 23). Five- or six-story buildings were not an anticipated outcome of the 2010 update. Apartments in LR3 zones in urban villages and centers are the only type of housing that may access the 40' height limit, but similar slope issues are present in areas where the height limit is 30'. In these areas, buildings that appear to be four stories have been constructed. To address this issue, DPD proposes a new standard to control tall facades on downhill slopes where they face the street.

New height control to limit the maximum street facing façade height.

Add a new standard (new SMC 23.45.515) limiting the height of any street-facing façade at the edge of a street-facing property line. Apply the limit within 12' of the street-facing property line. Include any parapets, clerestories and rooftop structures in the limitation. We anticipate this standard will create an upper-level setback condition on downhill sides of sites. The upper level setback achieves the public benefit of reducing the visual appearance of bulk and scale to the public street and preserves light penetration and views of sky from the street or sidewalk. The standard would be structured as follows:

- **Where a 40' height limit applies:** limit the height of any street-facing façade to 44' above grade at the edge of a street-facing property line.
- **Where a 30' height limit applies:** limit the height of any street-facing façade to 34' above grade at the edge of a street-facing property line.

The reason the maximum street facing façade height is set at a number 4' greater than the height limit is to accommodate some slope on a lot. On the low side of a slope, the average grade plane measurement enables a higher dimension. For example, a lot that slopes 8' would have an average grade plane 4' higher than grade at the low side of the slope. Since the proposed measurement is taken from the

property line, this new standard would also address cases where a steep slope near the sidewalk allows a structure to appear significantly taller than the height limit as viewed from the street. (See Figure 21). The proposed standard would ensure the structure is no higher than 44' above the sidewalk within 12' of the street. It is expected this standard would create an upper level setback condition in some cases.

Adjust code provisions that allow use of clerestories and FAR calculations in unexpected ways.

This group of code adjustments focuses on several topics where code provisions were used in ways clearly not intended or evaluated during the 2010 update process. Instead of focusing on a single issue or zone, this group of adjustments addresses “clean up” items that are common when a major update is executed.

Place limits on use of clerestories and similar features (23.45.514.J.3): Various rooftop features are allowed to extend above the allowed height limits by specified amounts. Most rooftop projections that result in additional interior space, such as dormers, are limited to 30% of roof coverage pursuant to 23.45.J.3. However, the code did not include such limitation on other types of rooftop features including skylights and clerestories, which may project up to 4' above the height limit. These features were not originally expected to be used to create additional useable space in a building. But without the limitation on roof coverage, some clerestories were used to contribute to more useable area in the building, such as loft space on upper floors. Combined with other exceptions and incentives, the 4' allowance contributed to structures exceeding the numerical height limits by significant amounts (see Figures 20-22 for examples).

To address this issue the following limits are recommended:

- Clerestories, skylights, and other architectural projections may not cover more than 30% of the roof plane and must be set back at least 4' from the edge of the roof. (New 23.45.514.J.3.b)

Include unenclosed exterior stairs, hallways, and breezeways in chargeable FAR (23.86.007). The exemption of exterior stairs, hallways, and breezeways from chargeable FAR has been used in to substantially increase the buildable floor area of some apartment buildings. As seen in Figure 11, exterior corridor or circulation space account for 14.8%, 20%, and 27.3% of overall floor area in some of the sample buildings, effectively increasing each building's floor area by those respective amounts.

These quantities were not anticipated during the 2010 update. Illustrations and diagrams presented to the Council did not include exterior corridors and the corresponding floor area increases associated with them. DPD has also observed that when exterior corridors are used, they tend to

break the building into components that are often shifted towards the edges of sites. We believe this configuration increases the sense of mass and scale (see Figure 12.)

To address this issue the following is recommended:

- **Modify the Floor Area Ratio (FAR) Measurements section (23.86.007)** for lowrise multifamily zones to include covered exterior circulation corridors except for at-grade walkways, courtyards, and similar.

Include floor area of loft spaces in FAR calculation. As noted in Section 3 of the report, several buildings have included upper story loft spaces. While described as storage lofts, these can be used in practice as sleeping lofts. Because ceiling height limits are less than the building code minimum, the areas are not charged against FAR. This additional useable space was not anticipated at the time of the 2010 major update. The loft space can increase the appearance of bulk and scale in the building as viewed from the exterior. To address this issue we make the following recommendation:

- **Include loft space in FAR.** In the calculation of FAR in lowrise zones, identify that any finished space with a clearance of more than 36 inches be included as chargeable floor area.

Address unanticipated density levels and adjacencies in the Lowrise 1 zone.

These recommendations apply primarily to the LR1 zone. The largest area of LR1 zoning where these developments have occurred is within the Ballard Hub Urban Village, where DPD has heard several concerns about unanticipated levels of density. These recommendations seek to reconcile the allowable density level for development in LR1 zones with the levels expected during the 2010 update.

Add a side setback requirement for rowhouse development if adjacent to other types of housing.

Currently no side setback is required for rowhouses except if adjacent to a single-family zone. The intent of this allowance was to encourage rowhouse development as an alternative to townhouses. Rowhouses must share sidewalls and directly face the street. Townhouse development, however, may locate a set of dwelling units behind other dwelling units on a lot. The 0' side setback was intended to provide flexibility so that rowhouse forms could compete with townhouse forms, since the number of rowhouses is limited by the width of the lot. It was also intended to mirror the traditional backyard configuration found in many existing lowrise zoned areas. Lastly, it was meant to encourage a historic form of development observed in other cities.

DPD received public comment and concern about the potential adjacency impacts associated with a 0' side setback. The sidewall of a rowhouse unit often does not have many window penetrations or modulation. The 0' side setback could also result in shadowing impacts. We have heard concerns about inadequate space to construct and maintain the sidewall of the structure if a 0' setback is present (see Figures 27 and 28 above).

To address the issue, DPD proposes:

- **Add a 3.5' side setback requirement for rowhouses where they are adjacent to non-rowhouse development.** This 3.5' side setback provides enough space for basic maintenance and for a modest buffer from an adjacent lot.

Change rounding requirements for the density limits in lowrise zones. Currently density limits allow for rounding of units, so that if the allowable number of units ends up with a fraction greater than 0.5, a developer may round up to include the next dwelling unit. In some cases, subdividing land to lot sizes beneficial for rounding purposes has allowed the creation of more townhouse units than expected during the 2010 update. Specifically, in the Lowrise 1 zone, we have observed four townhouse units located on a common 5,000 sf lot as opposed to three, which was not expected at the time of the 2010 update. Figures and graphics depicting lowrise development during the 2010 update exclusively indicated three townhouse units or fewer on a 5,000 sf lot (see Figure 29 and 30 above and the discussion on page 31).

To address the issue, DPD proposes:

- **Change the rounding threshold from 0.5 to 0.85** for when a fraction of allowable units may be rounded up to the next whole number. Apply this adjustment in the lowrise multifamily zones only.

Add a density limit for rowhouses in the LR1 zone. Currently there is no density limit for rowhouses. No density limit was instituted because the practical width of the lot was expected to control the density of rowhouses. Because all rowhouses share sidewalls and face the street, only a certain number can practically fit side-by-side on the lot. We expected there would be no sets of additional housing units behind rowhouses on a lot. Some developments have subdivided lots in ways that work around this requirement (see page 31).

To address the issue, DPD proposes:

- **Add a density limit for rowhouses in the LR1 zone of one unit per 1,600 sf of lot area.** This density limit is consistent with the limit for townhouses.

Additional or future considerations

We also want to identify ongoing and planned efforts of the City and DPD—beyond the scope of the proposed code changes—that could help respond to the concerns we have heard. We acknowledge that these initial code adjustments will not address the full range of concerns and comments heard during our outreach about lowrise zoning.

- **Dialogue about growth—Seattle 2035:** Continue to work with residents to communicate ideas about growth in the context of the major Comprehensive Plan update. The Seattle 2035 process will set the city’s growth strategy for the next 20 years, and many land use policies and zoning will stem from the plan update.
- **Explore new tools for enhancing livability in fast-growing areas:** In areas experiencing the most growth, evaluate new tools for investments in parks, libraries, transit, and other amenities to ensure excellent livability accompanies growth.
- **Continue improvements to permitting processes and notice:** Evaluate reforms and improvements to permit processes to ensure appropriate levels of notice and design review in proportion to the potential impact of projects.

5. Impact Evaluation of Recommended Code Adjustments

This section considers the overall effects or impacts of the proposed code adjustments. It is important to note that the proposal is a set of code adjustments to the major multifamily zoning code update completed in December 2010 (Ordinance 123495). Therefore, this proposed set of code adjustments is not a completely independent or new initiative. It is an analysis of actual development observed since the 2010 code update and an evaluation of how results compare to expected outcomes.

Due to the nature of the proposed Ordinance, it is appropriate to consider the environmental review (SEPA determination and decision) associated with the 2010 major multifamily code update as a baseline. The 2010 SEPA work identified the expected development capacity and evaluated potential impacts of the new multifamily zoning code. The analysis set a clear level for the scale and intensity of the expected development in multifamily zones and was deemed acceptable and consistent with policy.

The evaluation with this report 1) compares how actual development deviates from the expected 2010 analysis and 2) how the proposed code adjustments would be likely to produce results in comparison with the levels anticipated by the 2010 analysis.

Density Limits

The 2010 environmental analysis estimated projected densities for each of the three zones based on an assumed density of development for each housing type and an assumed ratio of housing types in the zone. The rowhouse housing type was assumed to be encompassed within the townhouse housing type because they have similar density levels. A summary of the assumed densities from the 2010 analysis is below

Figure 33
2010 Lowrise Multifamily Zoning Code Update
Environmental Review Assumptions

	2010 Assumed Blend of Housing Types	2010 Assumed Density
Lowrise 1	All ground-related (rowhouse and townhouse) no split.	1 unit per 1,800 sf lot area
Lowrise 2	50% townhouse 50% apartments	1 unit per 1,110 sf lot area
Lowrise 3 Outside Growth Area	50% townhouse 50% apartment	1 unit per 957 sf lot area
Lowrise 3 Inside Growth Area	25% townhouse 75% apartment	1 unit per 670 sf lot area

We can compare available data and our observation of actual development after new lowrise zones were implemented to these density assumptions.

Housing Type Split

Using the dataset summarized in Section 2 above, we can compare the actual split of development types from September 2011 to September 2013 given the 2010 assumptions. For the comparison, we assume all ground-related housing types (townhouses, rowhouses and single-family clusters) have similar densities.

- In **LR1 Zones**, the 2010 assumption of all ground-related housing is very close to what has actually been built since 2010. Of the actual observed project permits for housing units, 5% were in apartments and 95% were in ground-related housing.
- In **LR2 Zones**, the 2010 assumption of 50% apartment types was slightly higher than the observed data. Of actual observed project permits for housing units, 37% were in apartments and 63% were in ground-related housing.

- In **LR3 Zones**, the 2010 assumption was 50% to 75% apartments depending on whether the area was outside or inside of a growth area. The observed project permit data is for all of the LR3 zones combined and shows that 76% of housing units were in apartments and 23% were in ground-related housing—the high end of the assumed range.

In summary, the 2010 assumptions about the split or “blending” of housing types were close to what was actually developed. Observed development appears to be within an acceptable range of the assumptions about the mix of housing types in the LR zones.

LR1 Density Level

The density level of actual development permits in the Lowrise 1 zone appears to be substantially higher than the assumed amount for the zone. As seen in Figure 33 above, the 2010 assumed density for new housing in LR1 was one unit per 1,800 sf of lot area.

Each of the LR1 housing developments discussed in Sections 2 and 3 of this report resulted in four new housing units in townhouse, rowhouse, or single-family cluster configurations on what was originally a 5,000 sf platted lot. Therefore, the actual achieved density in these examples is one housing unit per 1,250 sf of lot area (5,000 sf / 4 units). This observed density level is 30% higher than the 1 per 1,800 sf lot area we expected. Based on a general review of the LR1 permits and built projects since 2011, we believe this housing configuration is common and being replicated in many LR1 project permits.

In Section 4, we proposed new density rounding practices and density limits for rowhouses in the LR1 zone that would, in most cases, reduce to three instead of four the number of housing units achievable on a standard 5,000 sf lot. If enacted, this code adjustment would reduce the density of infill development on such lots to one unit per 1,666 sf of lot area (5,000 sf / 3 units), a level of density much closer to the amount projected in 2010. Since not every project would achieve maximum lot utilization, in practice the aggregate density level would likely skew upward, even closer to the 2010 assumed amount of one unit per 1,800 sf of lot area.

In summary, the proposed code adjustments for the LR1 zone will have the effect of bringing actual buildable density levels in line with the densities expected during the 2010 code update. Therefore, the proposed LR1 adjustments would not be a reduction of development capacity below levels intended by City policy and evaluated for consistency with growth planning.

LR3 Density Level

The density level of actual development permits in the Lowrise 3 zone appears to be higher than the 2010 expected amount for the zone. As seen in Figure 33, the 2010 assumed density for new housing was one unit per 670 sf of lot area for LR3 zones in growth areas (urban villages, urban

centers, and station areas). Growth areas are the focus of the analysis because the proposed changes directly affect this segment of lowrise development.

In Sections 2 and 3, we reviewed six example LR3 housing developments, all located in urban centers and villages. The actual observed density levels for projects are summarized in Figure 34 below.

Figure 34
Observed Density of Development Projects in LR3 in Growth Areas

	Housing Units (for growth tracking purposes*)	Lot Size	Density (1unit per # sf lot area)
2371 Franklin Ave E.	10	4,400	440
1720 & 1728 E. Olive	14	7,205	515
1305 E. Mercer St.	14	6,014	430
4029 7 th Ave. NE	75	10,695	143
123 18 th Ave. E.	67	18,672	279
1814 12 th Ave. S.	22	7,201	327
Average			355

* The first three projects are micro-housing, and are considered per the bill and Director’s Report on micro-housing related to how micro-housing would be addressed for growth tracking and planning purposes.

Figure 34 shows that the average density for the six sample projects was one unit per 355 square feet of lot area, 47% higher than the 2010 assumed amount of one unit per 670 sf of lot area. Based on a general review of the LR3 permits and projects built since 2010, we believe housing configurations like these are common and would reflect a significant portion of the apartment development in the LR3 zone in growth areas.

DPD proposes to remove the exemption for a partially below-grade floor, and building area in exterior corridors and breezeways would be counted against FAR limits. As seen in Figure 11 above, exempted below-grade floor area accounted for approximately 5% to 19% of total building floor area, while exterior corridors and breezeways were 14% to 20% of building floor area (when included in a project). Therefore, the proposed adjustments would likely reduce maximum building floor area by approximately 15% to 20%. This reduction would translate to a corresponding reduction in density from the one unit per 355 sf of lot area observed above.

Since the observed density level of one unit per 355 sf of lot area is 47% higher than the 2010 assumed amount (one unit per 670 sf lot area), the reduction in buildable floor area and corresponding density associated with the proposed code adjustments can occur without reducing density below the levels expected in 2010. In fact, for several of the observed projects, a density reduction of 20% could result in density levels still in excess of the 2010 expected amounts.

In summary, the proposed code adjustments for development within the LR3 zone in growth areas will have the effect of bringing actual buildable density levels in line with the expected amounts evaluated at the time of the 2010 code update. Therefore, the proposed LR3 code adjustments would not be a reduction of development capacity below levels prescribed by City policy intent and evaluated for consistency with growth planning.

Citywide Development Capacity

The 2010 environmental analysis estimated that, under the proposed new code, the lowrise zones would have a development capacity of 38,903 additional housing units. This was an estimated 10% increase over what was achievable under the code prior to the 2010 update. Development capacity models are the theoretical total capacity of the zones, without any time horizon.

To put the amount of lowrise development in context, we can compare the first two years of development (September 2011-September 2013) to the overall expected capacity. During this period, 2,376 housing units were in permitting in LR zones. This equals 6.1% of the total development capacity of the LR zones. The uptake rate relative to expected capacity was highest in LR1 (7.4% of total capacity), followed by LR3 (6.0% of total capacity). The uptake rate was lowest in LR2 (5.7% of total capacity).

If the same rate were to continue, it would take about 32 years for all development capacity in the LR zones to be used up. While this is a relatively fast rate of uptake, it is not outside the realm of an expected pace of development in the zones.

Figure 35
2010 Expected Development Capacity
And Observed Dwelling Units Permitted

	Expected Capacity 2010 Environmental Documents	Dwelling Units in Permitting September 2011 – September 2013	% Of Expected Capacity Used
LR1	5,839	432	7.4%
LR2	12,005	688	5.7%
LR3	21,059	1,256	6.0%
Total	38,903	2,376	6.1%

As previously noted, DPD has observed densities of development above the 2010 expected amounts, particularly in the LR1 and LR3 zones. Sample LR1 development was up to 30% and sample LR3 development up to 47% denser than assumed amounts. These findings suggest that, without code adjustments, eventual build-out, particularly in the LR1 zone and LR3 growth areas, could push the total capacity beyond the 38,903 additional units expected. The proposed code adjustments would bring the trajectory of actual development in LR zones more closely in line with the 2010 expected amounts.

Effect on Housing Supply and Affordable Housing

One potential concern is that a reduction in buildable area or capacity in LR zones could be a reduction of available supply for affordable housing. However, DPD estimates this potential effect to be very small or negligible when put in context.

The recommended code adjustments will primarily address development in Lowrise 1 and Lowrise 3 zones within urban centers and urban villages. In the most extreme scenario, the adjustments could reduce allowable density in LR1 by a maximum of 25% compared to current development patterns (assuming achievable density on a representative lot is reduced from four units to three and applied broadly throughout.) In the LR3 zone within urban centers and villages, the adjustments could reduce of buildable floor area an estimated 20% compared to present development (assuming removal of exemptions for below-grade floor area and inclusion of exterior corridors in FAR.) In reality, not every project or even a majority of projects would be expected to experience this degree of reduced density of buildable area.

Nevertheless, if we consider these potential maximum effects across the LR zones as a whole, the resulting reductions are minor. Lowrise 1 make up 21.8% of total LR-zoned areas, and LR3 zoned areas within urban villages and centers cover 25.3% of total LR-zoned areas. Code adjustments would directly affect less than half of all lowrise areas. Furthermore, any impact on housing affordability through the lens of supply is indirect and longer term in nature. While increased housing supply in LR zones could reduce prices for older rental housing stock in the overall housing market due to the incremental increase in supply, these effects are difficult to quantify and would take time to realize.

Immediate construction of new housing in LR zones, or any zone, tends not to be on the affordable end of the spectrum due to the cost of new construction. New housing typically has a higher rental cost than older housing. For example, studio apartments built since 2008 in Capitol Hill and First Hill rent on average for around \$1,400 per month, while studios in the same neighborhoods built between 1985 and 1989 rent for around \$1,000 per month. So in the aggregate, increases in housing affordability in the immediate term due to new construction in LR zones in new buildings is not expected to be large. Also keep in mind that the potential capacity reductions due to the code adjustments bring density and buildable area back in line with what was expected at the time of the 2010 update. In that sense, the code adjustments should not be considered reductions in buildable area or density in the first place.