



City of Seattle
Seattle Planning Commission

David Cutler and Amalia Leighton, Co-Chairs
Vanessa Murdock, Executive Director

MEMORANDUM

April 11, 2014

TO: Diane Sugimura, Director, Department of Planning & Development

FROM: Seattle Planning Commission

RE: **Commission Comments on Lowrise Multifamily Code Corrections**

CC: Mayor Ed Murray; Seattle City Councilmembers; Hyeok Kim, Andrea Riniker, Robert Feldstein, Kathy Nyland, Mayor's Office; Marshall Foster, Nathan Torgelson, Susan McLain, Mike Podowski, Geoff Wentlandt, DPD; Rebecca Herzfeld, Eric McConaghy, Lish Whitson, Council Central Staff

Dear Ms. Sugimura,

The Planning Commission has been briefed by Geoff Wentlandt and Mike Podowski on the Lowrise Multifamily Code Corrections work undertaken by the Department of Planning and Development (DPD) at the request of Councilmember Sally Clark. We understand that review and modification of this zone is intended to improve future development, and we appreciate being asked for our feedback on DPD's approach to modifying the zone.

As stewards of the Comprehensive Plan, we would like to highlight some of the broad considerations shaping our recommendations on the Lowrise Multifamily Code Corrections:

Development in Multifamily Lowrise zones helps the City meet the goals of the Growth Management Act. Seattle's Lowrise Multifamily zones play an important role in the city's

ability to welcome and retain a diverse combination of households with a spectrum of income levels. As noted in our recently released [Family-Sized Housing Action Agenda](#), Lowrise zones provide the greatest potential within Seattle for adding to the stock of affordable, family-sized housing.

Additionally, through reports such as [Seattle Transit Communities](#) and [Housing Seattle](#), the Planning Commission has an established history of supporting citywide policies that enable new development to contribute positively to neighborhoods and to facilitate a variety of housing choices affordable for people who want to live there.

We appreciate the thoughtfulness with which DPD has been exploring potential modifications to the Lowrise Multifamily Code, and we offer the following recommendations and observations on the preliminary DPD staff recommendations for Lowrise Multifamily Code Corrections shared with us at our March 11 Commission meeting.

Introduce a new maximum height for street-facing façade.

DPD has communicated that concerns regarding scale/context are focused in the Growth Areas within the Lowrise 3 zone, where apartment buildings have a 40-foot height limit and where the use of multiple allowances or incentives results in buildings that exceed this height.

The Commission supports DPD's recommendation to introduce a new street-facing façade height limit, measured from the adjacent sidewalk. We agree that this will help address imposing street frontages, particularly on the downward side of sloping sites. The Commission is very supportive of efforts to improve the pedestrian experience and the manner in which buildings interact with street-level activities.

Keep the Floor Area Ratio (FAR) exemption for exterior stairs, hallways and breezeways.

The Commission has concern with the preliminary recommendation to eliminate the FAR exemption for exterior stairs, hallways, and breezeways. Exempting these areas from FAR calculations may result in less bulk and more modulation of the building by encouraging exterior circulation. In addition,

exterior circulation has benefits to the overall energy performance of buildings, thus encouraging greener building practices.

Require a façade setback for clerestories.

Clerestories may contribute to better design, adding functional interior space as well as visual interest. At the same time, these elements can also unnecessarily add to the perceived bulk of a building and accentuate its height as perceived from the street.

Requiring a setback from the street-facing facade would preserve a good amount of flexibility in the way these features are incorporated with a building's design and would potentially offer an effective way to reduce potential and/or perceived visual impact.

Maintain the FAR exemption and the additional 4-foot height allowance for a partially below-grade story in the Lowrise 3 zone and encourage grade-related units with stoops.

Part of the intent of the current development standards in Lowrise 3 zones is to promote building types that have street-facing, ground-related dwelling units that are elevated above the sidewalk and that have below-grade parking. The goal has been to encourage a more positive, pedestrian-friendly experience that includes eyes on the street. To further support this goal, the Commission recommends continuing the current FAR exemption for a partially below-grade floor, provided that the street-facing ground floor has grade-related units with stoops, or terraces facing the street.

Explore adding performance criteria for accessing the 40-foot height limit and 2.0 FAR maximum.

The City updated the Lowrise Multifamily Code in 2010 in part to promote well-designed buildings, encourage a variety of housing, and help direct growth to urban centers, villages, and transit station areas. It is important to preserve flexibility for developers to build to the height limits and FAR maximums in the current code, including those for apartments in LR3 zoning within Growth Areas. At the same time, it may make sense to require developers to undergo discretionary design review or meet additional performance criteria in order to access the 40 feet and 2.0 FAR maximums. We would advise that DPD further explore this idea.

Consider the potentially ameliorating effect of micro-housing legislation

Many of the new buildings brought to the City’s attention by residents concerned with development in Lowrise zones are micro-housing developments. We believe this form of housing plays an important role in increasing in-city housing options for individuals as noted in our [June 2013 letter](#) to the Council PLUS Committee and our [August 2013 memo](#) to you. These communications also indicated our support for the introduction of scale-based design review thresholds for micro-housing that will enable more consistent treatment of micro-housing relative to other forms of multifamily development types.¹

We are largely supportive of the micro-housing legislation that DPD has submitted for Council consideration, and will be providing specific comments regarding that legislation in the near future. We anticipate that design review provisions for micro-housing will help alleviate some design issues that have exacerbated concerns about the Lowrise zones, and we would ask that this be kept in mind as DPD prepares draft legislation to modify Lowrise zoning.

We look forward to continuing to work with you in making improvements to the Lowrise zones in response to the concerns raised recently by community members and in bolstering the City’s ability to encourage a greater variety of affordable housing choices over the long term.

We are available to answer any questions and would be happy to discuss all of our recommendations in more detail. You can contact either of us or call our Director, Vanessa Murdock, at (206) 684-0431.

Sincerely,



David Cutler
Co-Chair



Amalia Leighton
Co-Chair

¹ As part of the letter the Commission sent to Council President Burgess in March of this year responding to his request for recommendations related to large lots in LR 1 and 2 zones, we suggested that the City also conduct a broad look at design review thresholds in all three Lowrise zones.

SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURES & RECUSALS:

Commissioner Bradley Khouri disclosed that his firm, b9 architects, works on multifamily housing projects and that he works in the development of Lowrise housing that may be impacted by changes to the Lowrise zones. He also disclosed that he has advocated on the Lowrise Code Update as a private citizen.

Commissioner Colie Hough-Beck disclosed that the firm for which she works, HBB Landscape Architecture, works on multifamily housing projects that may be impacted by changes to Lowrise zones.