

**White Salmon Joint Work Session
City Council and Planning Commission**

Housing Code Updates

A G E N D A

November 02, 2023 – 5:30 PM

119 NE Church Ave and Zoom

Zoom Link: <https://us02web.zoom.us/j/84186492370>

Meeting ID: 841 8649 2370

Call In: 1 253 215 8782 US (Tacoma)



- I. Introduction**
- II. Presentations**
 - A. Housing Code Update Discussion**
- III. Adjournment**

File Attachments for Item:

A. Housing Code Update Discussion

What type of work does your company do?	What kinds of residential buildings does your company work on? (Single family homes, rowhomes, apartments, mixed-use buildings, etc?)	Are there other kinds of residential development or construction that you would like to see your company do in the future?	What do you see as White Salmon's major strengths and weaknesses as a potential location for future residential projects?	If you are a builder or developer, are there specific barriers in the current code that have limited the number or type of homes you have been able to build in the past, that would have otherwise been profitable and accepted by the market?	If you are a builder or developer, are there specific barriers that have made it generally more difficult for you to build more homes, that you think should be lowered?	If you are a builder or developer, are there other kinds of residential projects that you might build in White Salmon in the future, if specific barriers were removed? What are those barriers?	Are there specific incentives that would have made it easier or more likely for you to build, or work on, more homes?	Do you have any other recommendations for the City as it considers other ways to reform the zoning code and reduce barriers to home construction?
Builder	Single family, duplexes, zero lot line townhomes		Zoning - need more opportunity for multi-family like duplexes, triplexes	Zoning - need more opportunity for multi-family like duplexes, triplexes		Zoning - need more opportunity for multi-family like duplexes, triplexes	Zoning - need more opportunity for multi-family like duplexes, triplexes	Allow multi-family in Commercial zoning -- 100% multi-family residential, not just the 60/40 split
Builder	Single family and townhome	Low income	It is my preferred location to build	Yes, 700 of city road standard road to split a lot here in town.	Just where the city has neglected its infrastructure and wants to pass its entirely cost on to the first person to build on that street.			
Developer	All product. Primarily single family attached and detached product.	We are growing into master plan developers with our first master planned communities in Bend Or.	A major strength is the lifestyle White Salmon promotes. Outdoor adventure and close proximity to amazing outdoor amenities. The tax benefit of living in White Salmon is also a huge draw. The challenge developing over the years in White Salmon is the lack of consistency and clear and objective path for development. There has been staff turn over and more enforcement of staff opinions then clear & objective policies. I have seen this changing and growing and I am optimistic.	The lack of water is the biggest issue. We have wanted to put in a new development for over three years on Spring Street. The inconstant response and feedback from staff has been a challenge. The vision of planning staff to require specific housing types outside of current code.	As noted above.	Yes we would build more housing if the path to development and building was clear, objective and streamlined. We have seen a huge delay in developing from the lack of consistent staff feedback and turn over.	Yes we have a 36 unit project ready to go, right now if the city would respond quickly and help with the water issue. I have begged for a seat to sit down and talk to staff to help get this project going. It is met with a lack of response, weeks or months go by. Many of the staff that struggled with this are no longer there but even current staff is slow to respond and does not appear motivated to help get housing going quickly. Like in many things; time is money and we are ready to roll.	would love to sit down and happy to talk to anyone that wants to work together to build more housing.
Builder	Single family new homes, additions, remodels, ADUs.	No.	We have only remodeled within the White Salmon city limits and have not encountered constraints. My personal opinion is that White Salmon is a highly desirable location in the Gorge. Its surrounded by easily accessible recreational opportunities, great activities, entertainment, food and shops. It offers a unique vibe that either appeals to folks or does not. Of course, its an expensive area to relocate to, for anyone who doesn't already have connections or appropriate resources.	No.	No.	No.	No.	No, but thank you for asking!



TO: Marla Keethler, Mayor, City of White Salmon
Troy Rayburn, City Administrator, City of White Salmon
FROM: Michael Mehaffy, Structura Naturalis Inc.
RE: Initial review and recommendations on zoning changes for implementing the HAP
DATE: September 10, 2023

As requested, I have completed a preliminary review of the City’s zoning code and other associated regulations, and I have developed a series of draft recommendations (attached). I say that these are draft because in many cases, they need further consideration and vetting of potential problems or pitfalls, and or addition of supplemental recommendations. Even then, of course, I recommend that the stakeholders and members of the public have an opportunity to review and comment (and/or be surveyed) before these are formally proposed in the context of hearings and Council or Planning Commission actions.

As we have discussed previously, the City has a number of options on ways to proceed in adopting the Housing Action Plan, and in particular making changes to the existing zoning code and related ordinances. **One option is to make incremental changes to the code** to streamline entitlement and permitting, and to make it possible for more projects to move forward consistent with more recent higher-density design standards (while maintaining safeguards on quality and mitigation of impact to neighbors and the public).

As I noted, some of these incremental changes have already been mandated by recent state laws requiring “clear and objective” standards, higher densities, and related provisions. This is a double-edged sword: while it does compel the City to take certain mandatory actions, it may also help the City to move more quickly on adopting the HAP, since these are elements that must be complied with in any case. That is likely to translate into reduced time for hearings and potential delays from stakeholders.

A second option is to implement a broader zoning reform, shifting to a more graphical form-based coding approach. (This could also include so-called “pattern books” or “pattern languages,” and also prototype plans.) This would likely require more time and more steps in the process. In addition, I would recommend that such a broader action include consideration of street and public space design standards, since they affect the overall walkability, access to services, character and livability as well.

A third option would be to combine the first two, starting with some “low hanging fruit” including immediate zoning changes and streamlining, while working towards more fundamental changes later in the process. This approach would have the advantage of moving more quickly on helpful streamlining, such as making it easier to approve accessory dwelling units, easing minimum building width requirements, etc.

My recommendations follow the general approach of targeting the *impacts* rather than targeting the *use*, or other incidental aspects. This follows the broader shift within the profession away from complicated “non-agile” zoning that seeks to exhaustively list restrictions, and towards more “agile” performance-based zoning, that seeks to specify key performance criteria within a more streamlined coding environment.

Following this approach, I have identified a number of places where, with the best of intentions, the code has gradually become overly complicated and restrictive, and in that sense, “non-agile”. The goal is to streamline as much of this as possible, while ensuring that public good is maintained.

Mayor Marla Keethler
City Administrator Troy Rayburn
September 10, 2023
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Following then are my initial recommendations for short-term changes and streamlining reforms. This will run sequentially through the sections of the code.

16.65.020 Applicability of chapter provisions. Consider increasing the number of lots allowed under short plat chapter provisions. Currently the maximum number is four, and in most jurisdictions this could be increased to eight. (I do not see anything in RCW that restricts you to four lots, but this would need to be confirmed. I do see a restriction of four lots only for secondary subdivisions within 5 years.) This would be helpful in allowing and incentivizing small infill subdivisions.

Title 16 – General. I noticed there is no reference to compliance with RCW 58.17.060:

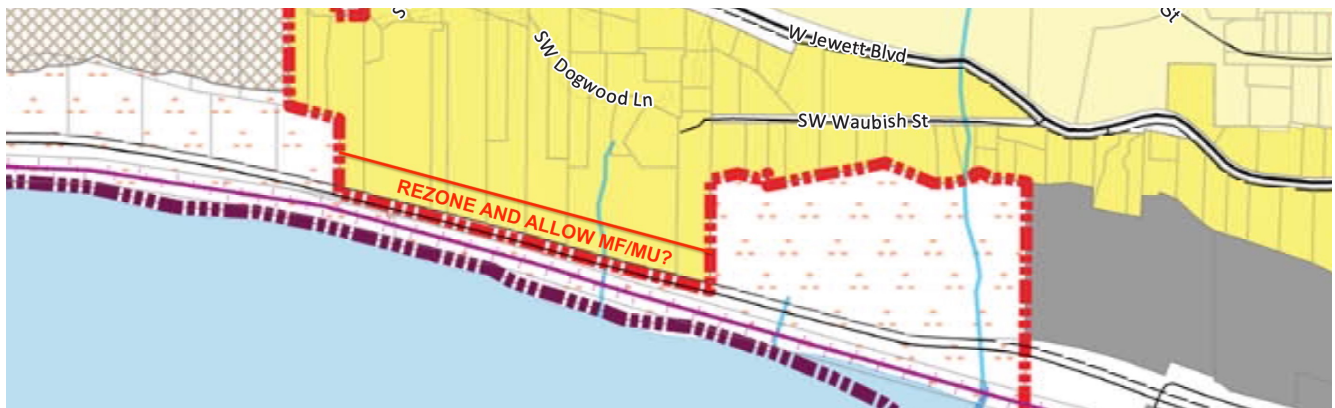
“(2) Cities, towns, and counties shall include in their short plat regulations and procedures pursuant to subsection (1) of this section provisions for considering sidewalks and other planning features that assure safe walking conditions for students who walk to and from school.

And

“(3) All cities, towns, and counties shall include in their short plat regulations procedures for unit lot subdivisions allowing division of a parent lot into separately owned unit lots. Portions of the parent lot not subdivided for individual unit lots shall be owned in common by the owners of the individual unit lots, or by a homeowners' association comprised of the owners of the individual unit lots.:

Title 16 - General. Consider providing technical assistance to small developers in the form of “best practice examples” of subdivision plats and plans that they may consult for “shovel-ready” models.

17.16.020 Boundaries of districts. Consider rezoning some current districts to zones that will accommodate additional housing units, with the consent of existing residents. For example, a portion of the R-1 single family detached zone could be suitable for a rezone along Lewis and Clark Highway, at the bottom of the very long “shotgun” lots that extend down from Dogwood Lane. (This would likely require a parallel “peel” street, however, and would require evaluation for steep grades, proximity to the railroad, etc.) The current owners would not be obliged to partition their lots for redevelopment, but could be allowed to do so, creating additional economic value (see below).



There may also be an opportunity to rezone some of the current RD Riverfront District, either to an existing zone that accommodates housing, or to modify the RD zone to allow more housing (Discussed in more detail below).

17.23.035 Property development standards (RL).

- A1. Consider reducing the minimum floor area from six hundred feet to four hundred feet.
- A3. As discussed previously, consider reducing the minimum width to ten feet, or removing this requirement (since it is covered under the habitability requirements of the building code as well as fire setbacks, etc).
- A5. Consider increasing maximum height from twenty-eight feet to thirty-five feet, except in key view shed areas, to accommodate more residents per building.
- B2. Consider clarifying that when an accessory dwelling is allowed, a stub-out is also allowed. (Currently unclear.)

17.23.040 Density provisions (RL).

- B. Consider increasing to three stories, and maximum height thirty-five feet, except in key view shed areas, to accommodate more residents per building.
- C. Consider reducing minimum lot size from twenty thousand square feet to eleven thousand square feet (~1/4 acre).
- D. Consider increasing flexibility for lot depth, e.g. minimum depth in feet rather than ratio.
- E. Consider reducing minimum width to 50 feet.
- I. Consider making explicit the allowance of accessory dwelling units within 5 feet of the rear yard property line.

17.24.010 Principal uses permitted outright (R1). Consider adding attached dwellings, duplexes, and zero lot line or rowhomes to this section, with appropriate safeguards from impacts to neighboring properties (e.g. setbacks of end units).

17.24.025 Prohibited uses. (R1).

- G. Residents of more affordable homes may want to supplement vegetable gardens by keeping chickens or bees, which are prohibited under this ordinance.

17.24.035 Property development standards (R1).

- A1. As in 17.23.035, consider reducing the minimum floor area from six hundred feet to four hundred feet.
- A3. As in 17.23.035, and as discussed previously, consider reducing the minimum width to ten feet, or removing this requirement (since it is covered under the habitability requirements of the building code as well as fire setbacks, etc).
- A5. As in 17.23.035, consider increasing maximum height from twenty-eight feet to thirty-five feet, except in key view shed areas, to accommodate more residents per building.

17.24.040 Density provisions (R1).

- B. As in 17.23.040, consider increasing to three stories, and maximum height thirty-five feet, except in key view shed areas, to accommodate more residents per building.
- C. Consider reducing minimum lot size from five thousand square feet to three thousand square feet (14.5 DU/AC).
- D. Consider reducing minimum depth to fifty feet.
- E. Consider reducing minimum width to thirty feet for a detached home, and twelve feet for a zero lot line or rowhome.
- F. Consider eliminating maximum lot coverage, or increasing to seventy-five percent.
- F. (Typo, duplicate letter “F” should be revised.) Consider reducing front yard setback to twelve feet, with allowance for porches, stoops or other transitional structures to encroach up to 8 feet into this “frontage zone”.
- G. Consider allowing side yard setback as low as three feet in certain circumstances (e.g. where permitted by fire and building codes) and zero for rowhomes.
- H. Consider reducing minimum side yard setback on flanking street to ten feet.
- I. Consider reducing rear yard setback to ten feet.

17.24.050 Off-street parking space (R1). Consider allowing assigned group parking off-site but within a specified distance of each home, e.g. 100 feet.

17.28.010 Principal uses permitted outright (R2). Consider adding attached dwellings and zero lot line homes to this section, with appropriate safeguards from impacts to neighboring properties (e.g. setbacks of end units).

17.28.025 Principal uses permitted subject to site plan review (R2). Consider expediting approval of site plans conforming to all other provisions through administrative approval.

17.28.030 Conditional uses (R2). See section 17.40.010. Consider shifting from conditional use to permitted use when otherwise in conformance with the zoning code.

17.28.034 Property development standards (R2).

- A1. As in 17.23.035, consider reducing the minimum floor area from six hundred feet to four hundred feet.
- A3. As in 17.23.035, and as discussed previously, consider reducing the minimum width to ten feet, or removing this requirement (since it is covered under the habitability requirements of the building code as well as fire setbacks, etc).
- A5. As in 17.23.035, consider increasing maximum height from twenty-eight feet to thirty-five feet, except in key view shed areas, to accommodate more residents per building.

17.28.040 Density provisions (R2).

- B. Consider reducing minimum lot size from five thousand square feet for single-family structures to three thousand square feet (14.5 DU/AC), duplexes to four thousand square feet, and rowhomes to one thousand square feet.
- C. Consider reducing minimum depth to fifty feet.
- D. Consider reducing minimum width to thirty feet for a detached home, and twelve feet for a zero lot line or rowhome (the smallest and potentially most affordable width).
- E. Consider eliminating maximum lot coverage, or increasing to seventy-five percent.
- F. Consider reducing front yard setback to twelve feet, with allowance for porches, stoops or other transitional structures to encroach up to 8 feet into this “frontage zone”.
- G. Consider allowing side yard setback as low as three feet in certain circumstances (e.g. where permitted by fire and building codes) and zero for rowhomes.
- H. Consider reducing minimum side yard setback on flanking street to ten feet.
- I. Consider reducing rear yard setback to ten feet.

17.28.050 Off-street parking space (R2). Consider allowing assigned group parking off-site but within a specified distance of each home, e.g. 100 feet. Consider waiving or reducing off-street parking space requirements when immediate on-street parking is available, when joint (shared) parking is available, when within a specified distance of a transit stop, or when other specific transportation demand management (TDM) actions are taken.

17.32.020 Accessory uses (R3). Consider amending the prohibition against any “business, trade or industry” to include conditional use permitting of “compatible” commercial uses, including retail uses that serve adjacent residential areas (e.g. “corner store”).

17.32.025 Principal uses subject to site plan review (R3). Consider expediting approval of site plans conforming to all other provisions through administrative approval. Consider increasing the allowable number of rowhome units in each project.

17.32.032 Prohibited uses (R3). Residents of more affordable homes may want to supplement vegetable gardens by keeping chickens or bees, which are prohibited under this ordinance.

17.32.034 Property development standards (R3).

- A1. As in 17.23.035, consider reducing the minimum floor area from six hundred feet to four hundred feet.
- A3. As in 17.23.035, and as discussed previously, consider reducing the minimum width to ten feet, or removing this requirement (since it is covered under the habitability requirements of the building code as well as fire setbacks, etc).
- A5. As in 17.23.035, consider increasing maximum height from twenty-eight feet to thirty-five feet, except in key view shed areas, to accommodate more residents per building.

17.32.034 Density provisions (R3).

- A. Consider increasing maximum stories to three stories, and maximum height thirty-five feet, except in key view shed areas (to accommodate more residents per building).
- B. Consider reducing minimum lot size for single-family structures from five thousand square feet to three thousand square feet (14.5 DU/AC), and duplexes to four thousand square feet.
- C. Consider reducing minimum lot size for rowhomes from two thousand five hundred square feet for the first two homes, and two thousand square feet for additional units, to a simpler flat rate of one thousand square feet. (For a “starter” home at 12 feet in width, this would mean a lot of 83 feet in length, not a small size.)
- D. Consider reducing minimum depth to fifty feet.
- E. Consider reducing minimum width to thirty feet for a detached home, and twelve feet for a zero lot line or rowhome (the smallest and potentially most affordable width).
- F. Consider eliminating maximum lot coverage, or increasing to seventy-five percent.
- G. Consider reducing front yard setback to twelve feet, with allowance for a porch to encroach up to 8 feet into this “frontage zone”.
- H. Consider allowing side yard setback as low as three feet in certain circumstances (e.g. where permitted by fire and building codes) and zero for rowhomes.
- I. Consider reducing minimum side yard setback on flanking street to ten feet.
- J. Consider reducing rear yard setback to ten feet.

17.32.050 Off-street parking space (R3). Consider allowing assigned group parking off-site but within a specified distance of each home, e.g. 100 feet. Consider waiving or reducing off-street parking space requirements when immediate on-street parking is available, when joint (shared) parking is available, when within a specified distance of a transit stop, or when other specific transportation demand management (TDM) actions are taken.

17.36.020 Permitted Uses (MHRP).

- C. Consider allowing home occupation as a permitted use (to provide income from low-overhead businesses to residents needing affordable housing).

17.36.030 Conditional Uses (MHRP).

- A. As above, consider allowing home occupations as a permitted use (to provide income from low-overhead businesses to residents needing affordable housing).
- E. Consider allowing dwelling units with at least fifty-five percent of units meeting affordable housing threshold as a permitted (not conditional) use.

17.36.040 Minimum development standards (MHRP).

- A. Consider reducing minimum setback from ten feet to five feet. Consider reducing public street frontage setback to twelve feet, with allowance for porches, stoops or other transitional structures to encroach up to 8 feet into this “frontage zone”.
- B. Consider simplifying regulations for spacing, and allowing tighter placements (reduce minimum of twenty feet between side-by-side units to ten feet; reduce minimum of twenty feet between end-to-end units to ten feet; reduce average distance from twenty feet to ten feet; reduce minimum of ten feet from mobile home to any cabana, carport or permanent structure to five feet; eliminate storage unit requirement). These make mobile home placements more costly and complex.
- C. Reduce minimum thirty foot wide roadway to twenty feet, with additional seven feet for on-street parking on each side as necessary.
- D. Consider allowing alternatives, e.g. compacted gravel with “tackifier”.

17.36.050 Off-street parking (MHRP). Consider reducing two off-public-street parking spaces minimum to one, where on-street parking is provided.

17.40.010. Uses authorized when (Conditional Uses in Residential Districts). Consider shifting conditional uses to permitted uses when fully conforming to the provisions of the code. Retain conditional uses only for grandfathered non-conforming uses.

17.48.010 Purpose – Use restrictions generally (C). Consider making explicit the goal of a mix of uses, and not strictly a “major shopping and business center”.

17.48.030 Conditional uses (C).

- A. Consider shifting residential use from conditional to permitted with certain restrictions (i.e. ground floor commercial use requirements, etc).
 - o 1. Consider reducing minimum square footage from six hundred to four hundred square feet.
 - o 2. Consider increasing maximum percentage of residential from sixty percent to eighty percent (e.g. 4 of 5 stories).
 - o 3. Consider replacing discretionary review (which may be prohibited by new state laws) with a more “clear and objective” design guidance, e.g. graphical form-based code, pattern book / pattern language, etc.

17.48.060 Density Provisions (C).

- A. Consider increasing maximum stories to four, and maximum height to fifty feet, except in a key view shed areas (to accommodate more residential units above and/or mixed with commercial).

17.50.010 Purpose – Use restrictions generally (RD). Consider shifting the emphasis away from a restricted-use district with limited residential toward a mixed-use district that encourages residential, particularly in vertical mixed-use formats.

17.50.040 Accessory uses allowed (RD). Consider shifting residential from secondary use to principal use allowed under the zone, with conditions.

17.50.050. Density provisions (RD).

- C. Consider (with WSDOT consultation) reducing minimum frontage on SR14 from two hundred feet to twelve feet for zero lot line and rowhomes, and thirty feet for detached homes. Require (with WSDOT consultation as needed) that homes be accessed by vehicles on lanes or alleys, to avoid overly frequent drive entrances. (Recommend minimum two hundred foot access separation, maximum three hundred foot.)
- D. Consider (with WSDOT consultation) reducing front yard setback on SR 14, and on secondary roads from twenty-five feet to twelve feet, with allowance for porches, stoops or other transitional structures to encroach up to 8 feet into this “frontage zone”.
- E. Consider reducing minimum side yard from twenty-five (or twenty) feet to five feet.
- F. Consider reducing minimum rear yard from twenty-five (or twenty) feet to five feet.
- G. Consider reducing minimum landscape buffer on SR14 from twelve feet (or ten feet) to four feet.
- H. Consider removing lot width to length ratio and replacing with minimum width and depth dimensions (e.g. thirty and fifty).

17.50.070 General development guidelines (RD). Consider replacing (or amending) this section with a new section that provides “clear and objective” standards, e.g. graphical form-based code, pattern book / pattern language, etc. (Some portions are in conflict with new state laws in that they appeal to subjective judgments, e.g. “sharp contrasts in building styles” etc.)

17.56.060 Minimum standards (Home Occupations). Consider easing restrictions in this section to allow “variations from the residential character” that are consistent with a compatible “live-work” activity, e.g. small retail, consulting, medical, etc.

17.64.030 Design Standards (Accessory dwelling units).

- B. Consider allowing more than one ADU per single-family residence, with conditions.
- C. Consider allowing ADUs on lots smaller than four thousand five hundred feet, as small as two thousand square feet (with all other conditions to be met).
- E. Consider allowing units smaller than three hundred square feet under a separate “tiny homes” or “tiny homes on wheels” provision.
- G. Consider increasing the allowable portion of the front façade to fifty percent.

- H. Consider removing the off-street parking requirement where when immediate on-street parking is available, when joint (shared) parking is available, or when within a specified distance of a transit stop, or when other specific transportation demand management (TDM) actions are taken.
- J. Consider removing or easing this restriction in favor of more “clear and objective” design standards for the entire neighborhood, including ADUs.

17.68.050 Front yards – projection of steps, fences and other structures (Design and Use Standards). Consider reducing the minimum distance of ten feet from projections to the property line, to four feet. Consider adding a clarifying stipulation that fences are allowed on the property line.

17.68.080 Rear yards – projection limitations (Design and Use Standards). Consider simplifying or eliminating the restriction on “eaves, cornices, steps, platforms, rear porches and similar projections,” and stipulating a simpler maximum projection into the rear yard setback (e.g. ten feet).

17.68.130 Manufactured home siting standards (Design and Use Standards). Consider replacing sections B and C with a more graphical form-based code and/or pattern book or pattern language.

17.68.150 Townhouse siting standards ((Design and Use Standards).

- A. Consider reducing minimum width from twenty feet to twelve feet.
- C. Consider reducing minimum parking requirements for more than three rowhome units from 2.5 spaces per unit when immediate on-street parking is available, when joint (shared) parking is available, when within a specified distance of a transit stop, or when other specific transportation demand management (TDM) actions are taken.
- G. Consider replacing “Project Design” language that is open to interpretation (e.g. “buildings should be articulated to provide identity,” “incorporate design features to reduce the appearance of building mass,” et al.) with “clear and objective” language, e.g. graphical form-based code, and/or pattern book or pattern language.
- G (Continued.) Consider removing unclear language on step-downs required near side yard areas and replacing with a graphical form-based code or pattern book or pattern language, and consider raising the minimum heights to accommodate a minimum of three story rowhomes (e.g. 35 feet). Require step-downs only near property lines bordering transitions to other building types.
- G (Continued). Consider replacing sections 3, 4, 5, 6, 7 with graphical form-based codes and/or pattern books or pattern languages, employing “clear and objective” standards in conformance with recently enacted state laws.
- H. Consider reducing requirement of ten feet of landscaping to four feet. Consider not allowing units to “turn their backs” on the public right of way, but rather, to have a front entrance facing the public right of way. Consider reducing the requirement for one tree per unit to one tree per thirty feet of building frontage.
- I. Consider replacing subjective terminology (“consistent and compatible,” “shall have some design details,” etc.) with a “clear and objective” graphical form-based code and/or pattern book or pattern language, specifying options for acceptable design. Consider requiring all garage doors to

face a separate rear lane and avoid multiple front curb cuts. (This issue is controversial among some builders; however, multiple driveway cuts remove the ability to accommodate needed on-street parking, and thereby cause wasted pavement areas on public streets. Studies also show that the cost of a rear lane is similar to the cost of multiple driveways. A significant public benefit is also produced with increased streetscape walkability and visual attractiveness when garages are removed to the rear.)

17.68.180 Maximum lot coverage (Design and Use Standards). Consider simplifying and/or eliminating this section in favor of graphical form-based code and/or pattern book or pattern language, specifying front, side and rear yard setbacks.

17.72.050 Parking spaces – Location (Off-Street Parking and Loading).

- A. Consider allowing remote parking for one-family and two-family dwellings.

17.72.060 Parking spaces – Expanded or enlarged uses. Consider simplifying this section.

17.72.090 Number of spaces for designated uses. Consider reducing the required number of spaces where on-street parking is provided, within a specified distance of a transit stop (e.g. one thousand feet), or where joint use parking is available per 17.72.070.

17.73 Cottage Infill Projects. (General recommendations.) Consider simplifying this section and/or providing a graphical form-based code, prototypical plans, and/or pattern book / pattern language guidance. The complex regulations may discourage applicants from moving forward.

17.73.020 Density and lot area. Consider increasing maximum density to one unit per 2,000 square feet. Consider increasing maximum number of cottage units to sixteen. Consider decreasing minimum size of cottage infill sites to 10,000 square feet.

17.73.030 Unit size. Consider eliminating ground floor and upper floor percentage regulations in favor of simpler minimum/maximum square footages. The complex regulations may discourage applicants from moving forward.

17.73.040 Lot coverage. Consider increasing allowable lot coverage from forty-five percent impervious coverage to seventy-five percent impervious coverage. New standards favor compactness combined with adequate water quality facilities which may be superior to lower density development with lower impervious coverage.

17.73.050 Open Space. Consider reducing common open space per unit from four hundred square feet two hundred square feet (the size of a generous patio). Consider simplifying the common open space prescriptive specifications. Consider reducing private open space from three hundred square feet to two hundred square feet (the size of a generous patio).

17.73.060 Building separation. Consider reducing ten feet minimum separation to six feet minimum separation. (A provision for avoiding aligned windows may be added.)

17.73.070 Setbacks.

- C. Consider allowing encroachment of porches, stoops and decks into Primary Yard up to 8 feet. Consider reducing Peripheral Yard setbacks from five to three feet.

17.73.080 Building height. Consider raising maximum height from twenty feet to thirty feet (two-story plus attic).

17.73.090. Parking and covered storage. Consider reducing parking requirements in line with other recommendations above. Consider increasing maximum number of stalls in a garage from four to ten.

17.74 Mixed Use Planned Unit Development. (General recommendations.) Consider simplifying and/or replacing part or all of this section with a more user-friendly graphical form-based code, pattern book / pattern language, etc.

17.74.040 MU-PUD development standards.

- A. Clarify whether both or either 1 and 2 are required (two acres and/or two existing zones, one residential and one commercial), and consider easing or eliminating this restriction.
- B. Consider increasing allowable density, and/or simplifying this section with more direct specifications (e.g. minimum lot size, etc). Density bonuses and other incentives may be counter-productive if they add regulatory complexity, and if more units and density are already sought as measures to address a housing shortage.
- C. Consider allowing an encroachment into the front setback up to eight feet to allow porches, stoops, decks, or other transitional structures. Consider requiring rear access for garages in the MU-PUD zone, and eliminating the front curb cut and eighteen foot driveway provision.
- D. Consider reducing the percentage of open space from twenty to ten percent, and increasing the provisions for usability (e.g. paths, furnishings, recreational facilities, etc).

17.74.050 MU-PUD approval criteria. Consider providing clearer guidance on best practice requirements for street patterns and connectivity (e.g. graphical form-based code or other specifications). Consider allowing mitigation where tree removal is required to make the site developable.

17.74.080 Special use – Cottage dwellings within MU-PUD. Consider simplifying or removing this section to encourage development. Consider matching (or deferring to) the provisions of 17.73, including recommended streamlining and easing of restrictions, e.g. formulas for minimum/maximum size by floor, heights, setbacks, impervious cover percentages, parking, etc.

17.74.090 Special use – Accessory dwelling units within MU-PUD. Consider simplifying or removing this section to encourage development. Consider matching (or deferring to) the provisions of 17.64, including recommended streamlining and easing of restrictions, e.g. formulas for minimum/maximum size by floor, heights, setbacks, impervious cover percentages, parking, etc.

17.75 Residential Planned Unit Development (General recommendations). Consider allowing R-PUD in R-2 and R-3 zones, and allowing higher densities, heights, lot sizes, setbacks et al., per the recommendations for those zones herein. Consider waiving the density bonus for affordable housing, since density is already helpful in increasing housing supply and the complexity of the bonus is likely to be a disincentive. Consider reducing the percentage of open space from fifteen to eight percent, and increasing the provisions for usability (e.g. paths, furnishings, recreational facilities, etc). Consider providing clearer guidance on best practice requirements for street patterns and connectivity (e.g. graphical form-based code or other specifications).

17.75.080 Alternative housing types – Cottage dwellings, townhouse and ADUs within an R-PUD. Consider simplifying this section and/or deterring to the relevant standards for each type (with recommended changes) as discussed above.

CONCLUSION

I find a number of significant opportunities to streamline, clarify, and otherwise modify the zoning code to allow and incentivize more residential units to be built in accordance with the Housing Action Plan – but also, importantly, while preserving or even enhancing the quality of development, and minimizing negative impacts to adjoining residents and to the natural environment.

The recommendations provided herein fall under several categories:

- 1) Reducing restrictions on unit numbers, densities, setbacks, heights et al., consistent with changes in the housing market and in best practice housing design.
- 2) Clarifying and streamlining the code where it may be repetitive, ambiguous, or unnecessarily restrictive.
- 3) Clarifying requirements that mitigate impacts on neighbors and/or the quality of the environment, e.g. requiring rear access to garages via lanes rather than multiple curb cuts, front driveways with parked cars, and garage doors that take up large percentages of the building frontages; and clarifying street connectivity and pattern requirements. These clarifications are not likely to increase costs, but will maintain quality even as densities are increased, as benchmark precedents demonstrate.
- 4) Clarifying and in some cases easing requirements for parking and other elements, consistent with recent state laws and changes in best practice. Often these are aimed at increasing housing supply and/or affordability, as well as shifting away from automobile dependence (a major household cost factor). A related requirement is for “clear and objective” approval criteria, in place of discretionary approvals.

I look forward to discussing these recommendations!