



May 24, 2010

TO: Council President Richard Conlin      Councilmember Jean Godden  
Councilmember Sally Bagshaw      Councilmember Bruce A. Harrell  
Councilmember Tim Burgess      Councilmember Nick Licata  
Councilmember Sally J. Clark      Councilmember Mike O'Brien  
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RE: Comments regarding Seattle's Multifamily Code Draft Legislation

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Thank you for your leadership and hard work on revisions to Seattle's Multifamily Housing Code Update. AIA Seattle's 2,000 members share your commitment to making our community better through design. We appreciate the Committee on the Built Environment (COBE)'s diligent work over the last one and a half years to take on the important issue of multifamily development. This is technical, complex, yet highly impactful work and we appreciate the time and effort each of you has put into the development of this draft legislation.

Through the process, we have seen COBE raise and answer many questions, particularly addressing the kinds of building types that would help us accommodate the growth we know is coming, provide quality housing at all income levels, and produce the walkable, beautiful, socially connected neighborhoods we all want. The draft legislation currently under consideration makes significant progress towards better-designed, more sustainable and attractive multifamily development. Many thanks to the COBE for their thoughtfulness in crafting this draft, as it is a step in the right direction in terms of the overall purpose of this update.

Despite the progress made, some of the proposed changes are still reactions to the results of the existing code, rather than fresh thinking about how this regulatory framework can shape our environment. We urge you to take full advantage of the opportunity to determine the effect of these new regulations on multifamily development.

Below is a summary of our review of the proposed legislation.

**We support incentives for good development**

Incentives proposed in the draft legislation will help address the need for a variety of housing typologies and encourage thoughtful solutions to parking. As we know, any changes to parking are controversial, regardless of policy direction. However, with parking being such a significant impact to housing design, we appreciate the Council's foresight in this area. Beyond what is currently proposed, we suggest expanding incentives to including "woonerfs" and green roofs over parking. Woonerfs (see attached imagery) create multi-use spaces, typically at grade, and reduce the impact of the automobile, thus improving the pedestrian experience. We propose allowing a percentage of the pervious woonerf to qualify for a portion of the residential amenity requirement. Additional incentives for green roofs over parking will help minimize the impact of the parking while addressing stormwater concerns.

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### **We support the Green Factor**

The inclusion of Green Factor requirements represent a major step towards development that relies on natural systems and enhances the sidewalk level environment. We suggest updating the Green Factor matrix to cover multifamily residential development. We will provide an updated matrix in the near future that we believe satisfies the goals of the city and provides the appropriate measures to create useable open space at ground level while addressing stormwater concerns.

### **We support your changes to parking requirements and density limits**

Although the draft legislation does not remove the prescriptive parking requirements in all zones, it addresses many of the design community's concerns by eliminating it in growth areas. Coupled with removing density limits specific to certain zones and incentivizing desired housing typologies, this increases the potential to accommodate growth through quality housing at all income levels. We still believe density limits need to be removed in all zones to create variations in unit sizes and affordability at every scale.

### **We applaud design flexibility**

The draft legislation significantly increases design flexibility. Positive changes include balancing mass and bulk through FAR, the reduction in setbacks to engage the public right-of-way in a more meaningful way, increased height limits permitting three stories under a variety of roof types, and the creation of additional housing typologies, such as rowhouses. Most of the incentives outlined in the draft support establishing a variety of housing solutions. Coupling these incentives with an effective Administrative Design Review process can eliminate the auto-court typology, addressing the biggest concern under our current code.

### **We urge you to promote Design Review over Design Standards**

While the draft legislation provides increased flexibility, it retains all of the Design Standards in the original proposal from DPD. We urge you to reconsider the need for such a prescriptive regulatory framework. Simultaneously, the Council is considering the possibility of requiring mandatory Administrative Design Review for all new townhouse projects. That discretionary process would permit the Council to remove the legislative mandate for trim, percentage of windows, etc. We support the Streamlined Design Review process currently before the COBE and advocate for its adoption.

### **We urge more be done to prevent the “four-pack” and “six-pack” typology**

As we are all aware, the controversial four-pack and six-pack townhouse typology emerged as a direct response to the current prescriptive code. Unfortunately, we believe that this typology is not sufficiently addressed in the draft legislation. We suggest adding “auto court townhouse” to the definitions section of the draft legislation and proposed language requiring Administrative Design Review for all “auto-court”-style townhouse developments.

Once again, thank you for your perseverance and hard work on this critical issue impacting the future of our city and region.