



May 10, 2024

Mr. Chris Pasinetti
Community Development Director
City of Enumclaw
1309 Myrtle Avenue
Enumclaw, WA 98022

RE: Request to update the Townhouse standards within the Code municipal codes.

The existing City regulations and standards for Townhouse development will not allow for this housing product to be efficient, aesthetic or achieve the typical densities that are associated with townhomes. Therefore, we propose the following changes to EMC 18.06.030.A Densities and Dimension Table, EMC 18.06.130.C. Zero Lot Line Development Conditions Table, 19.40.170.B.2.c. Garage Configuration and 19.40.170.B.4. Driveway on Private Internal Streets. We believe that townhomes should achieve densities in the 10-12 units per acre, allow for a variety of unit sizes and widths and be allowed to be built up to 3 stories with varying roof lines. The market supports ownership type townhomes on individual lots.

18.06.030.A. Density and Dimension Table

Maximum Building Height: The current code allows a maximum building height of 30 feet which significantly constrains the number of stories and the aesthetic opportunities of the buildings. In order to achieve the allowed densities with the desired units sizes; townhomes need to be built with 2 and 3 story units.

Townhouse units today are typically 2 and 3 story with the top floor having a vaulted ceiling to meet the expectations of the buyer and to compete in the market. Although a 3 story building can be built at a height of 30 feet for apartments (rental units); buyers of single family units (attached and detached) desire higher ceilings and in some cases vaulted ceilings; therefore an industry standard 3 story townhouse unit requires a building height of at least 40 feet. This minimum height will allow for 9 and 10 foot ceilings, framing between floors and a variety of roof lines to help create aesthetic buildings that appear smaller (see attached the EMC 18.06.030.A. Density and Dimension Table with edits).

The market and the City desire to avoid boring flat roofs without peaks over entrances or varying hip lines to break up the scale of the buildings. A variety of roof lines improve the aesthetics of the building, the neighborhood and the community as a whole.

18.06.130.C. Zero Lot Line Development Conditions Table

Minimum Lot area: The code allows a minimum of 3,000 square feet for a townhouse lot and this minimum should be revised to be 1,500 square feet. Townhomes are typically 18-30 feet wide, 43 – 53 feet deep, have a 20 foot driveway in the front and a 15 – 20 foot deep back yard. Based on these dimensions of product being built to meet the market demands, townhome lots would need to be 1,500 – 1,600 square feet as a minimum standard, with the typical range landing between 1,500 – 2,600 square feet. These are typical because builders can build them efficiently while meeting the demands of the buyers, thereby creating successful housing opportunities within the community. These unit widths are dictated by the need for livable spaces; including halls, bathrooms, bedrooms and not to mention garages. The market supports 2, 3 and 4 bedroom units and typical sizes of 1,300 square feet to 3,500 square feet. It should be noted that the units with more bedrooms typically are on the ends of the building due to the need for more windows. We request that the Minimum Lot Area be revised to 1,500 square feet.

It should be noted that the Minimum Lot Size in this code does not correlate to the density directly. In other words a minimum lot size of 3,000 square feet for townhouse products will not result in a density of 14.5 units per acre as taking the acre and dividing it by the lot size ($43,560\text{sf} / 3,000\text{sf unit} = 14.5\text{u/a}$). Due to the requirements for streets, roads, access tracts, parking, utilities, drainage facilities, parks, open space, critical areas, grades, size and configuration of parcels; theoretical densities are typically reduced by 25% to 50%, therefore it is realistic to expect the existing code standards to generate around 7-8 units per acre. The proposed revisions to the standards could result in a density of about 10-12 units per acre, which is more in-line with expected attached housing densities.

Minimum Street Frontage (interior lot): The code allows a minimum width of 30 feet which also dictates that the lot width must also be 30 feet wide since townhouse units are attached and have lot lines running along the side walls for the majority of the units. The 30 foot minimum does not allow to flexibility or a range of product types since most townhomes are between 18-30 feet, therefore the minimum Street Frontage (aka: lot width) should be revised to 18' This minimum lot width will allow for individual driveways and walkways for the smaller units.

Minimum Street Frontage (corner lot): The code allows a minimum width of 40 feet, which would include the end unit width and the side yard that is adjacent to the street. End units are typically the wider units, which would be the 25-30 foot wide units and we believe that a side yard setback next to a street should be reduced to 10 feet, therefore, the Minimum Street Frontage (AKA: Minimum lot width) for end units should be 35'.

Minimum Side Yard Setback: The code allows a minimum width of 0 feet for common wall and 15 feet for the end wall. We request that the minimum side yard setback should be reduced to

7.5 feet since townhomes are intended to be more dense than standard detached single family homes and to be consistent with other attached housing product standards.

Front Yard (minimum): The code allows a minimum depth of 20 feet, which allows for a car to be parked in front of the garage door with our extending into the public right of way or the sidewalk.

Rear Yard (minimum): The code allows a minimum depth of 25 feet which is the same as for single family detached home standards. Typical townhome units have back yards that are 15-20 feet deep depending on the site constraints and topography, therefore we request that the minimum rear yard setback be revised to 15'. This will also help create a wider range of product types, sizes and prices.

See attached the EMC 18.06.130.C. Zero Lot Line Development Conditions Table with edits.

19.40.170.B.2.c. Garage Configuration

The code currently requires single-width parking configurations for at least 50 percent of the units. This standard will significantly restrict the unit types, flexibility, price and marketability. Townhome users and thus the Townhouse market, expect convenient pedestrian and vehicular access to the unit, especially in suburban communities (Enumclaw is not Urban). Unlike Urban Townhomes, Suburban Townhomes rely on high daily vehicular use and storage, therefore we request that Townhome developments be allowed double width parking/driveway configurations where the unit width and available garage door widths allow, based on design and the market and not on a 50% limitation..

19.40.170.B.4 Driveways on Private Internal Streets

The code currently encourages units to limit the driveway depth to five to eight feet when served by private internal streets. The intent is to deemphasize vehicular access but vehicular access is a priority when buyers are looking for a home, whether attached or detached since the car is very important to American lifestyle, especially in suburban communities. Typical 20 foot deep driveways allow for additional off street parking for residents and guests alike, along with other uses and pedestrian access can still be emphasized with materials and landscaping. We request that Townhome units not be restricted from providing the standard 20 foot deep driveways in order to meet lifestyle expectations and thus the market.

Our requested revisions to the Townhouse standards are considered typical for the industry and collectively create marketable housing opportunities with price ranges that are below larger detached single family homes and above apartment style condominiums. Please see the example townhouse layout and samples of typical Townhouse products.

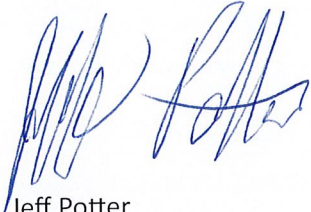
In addition to the desire to be competitive in the housing market, the City is also obligated to address the current King County directive for Cities to allow for future growth within the existing City boundaries but at the same time, most cities have very little if any undeveloped land remaining, therefore, reasonably increased building heights, decreased lot sizes and setbacks for Townhomes (predominantly owner

occupied) will be required to achieve the desired population growth throughout the County, and within each City in the foreseeable future.

In conclusion, we are asking that the City consider the above stated revisions to the standards for Townhome units.

Thank you for your time in considering our request to update your Townhouse zoning during your 2024 Comprehensive Plan Update.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Potter". The signature is stylized and cursive.

Jeff Potter

Director Of Land Development

INTEGRITY LAND LLC

18.06.030 Densities and dimensions – Residential zones. (with edits)

A. Density and Dimension Table.

STANDARDS	R-1	R-2	R-3	R-4	RMHP	PUD
Minimum Lot Area	15,000 sf	8,400 sf ¹	6,200 sf	6,200 sf ²	5 acres	Requirements found in Chapter 18.34 EMC, Planned Unit Development (PUD)
Maximum Density	N/A	N/A	1 DU per 6,200 sf ³	1 DU per 2,900 sf ⁴	1 DU per 6,200 sf	
Maximum Lot Area	N/A	18,000 sf ⁵	12,500 sf ⁶	N/A	N/A	
Minimum Street Frontage	50 ft	50 ft	50 ft	50 ft ²	Requirements found in Chapter 18.16 EMC, Residential Manufactured Home Park District (RHMP)	
Minimum Front Yard Setback	20 ft	20 ft	20 ft	20 ft		
Minimum Side Yard Setback ^{6,7}	9 ft	9 ft	9 ft	9 ft ^{2,8,9}		
Rear Yard	25 ft	25 ft	25 ft	25 ft		
Maximum Building Coverage ¹⁰	30%	40%	40%	40% ^{11,12}		
Maximum Building Height	30 ft	30 ft	30 ft	35 ft¹³ 40 ft		
Maximum Height of Accessory Building	≤ 120 sf 10 ft > 120 sf 18 ft	≤ 120 sf 10 ft > 120 sf 18 ft	≤ 120 sf 10 ft > 120 sf 18 ft	≤ 120 sf 10 ft > 120 sf 18 ft		
Detached Accessory Building ≤ 120 sf Minimum Side and Rear Setbacks	3 ft	3 ft	3 ft	3 ft		
Detached Accessory Building > 120 sf Minimum Side and Rear Setbacks	7.5 ft	7.5 ft	7.5 ft	7.5 ft		
Maximum Detached Accessory Building Coverage ¹⁴	50%	50%	50%	50%		

B. Residential Density and Dimension Development Conditions.

2. Lot size, minimum street frontage and minimum side yard setback may be modified for single-family, duplex, townhouse, cottage and zero lot line developments, subject to EMC [18.06.130](#).

18.06.130 Zero lot line development - R-4 zone. (with edits)

A. Zero Lot Line Development in the R-4 Zoning District. This concept is intended to make available needed housing at an affordable price, allow and encourage fee simple land ownership in the R-4 zone, maximize the use of public infrastructure, and provide development flexibility. It is intended to allow for alternate siting of single-family, duplex, cottage housing, and townhouse dwellings on individual lots if the development standards of the zone can be met.

B. Density and Dimension Table. These special provisions shall be considered as modifications to the zoning requirements provided all applicable development conditions are met.

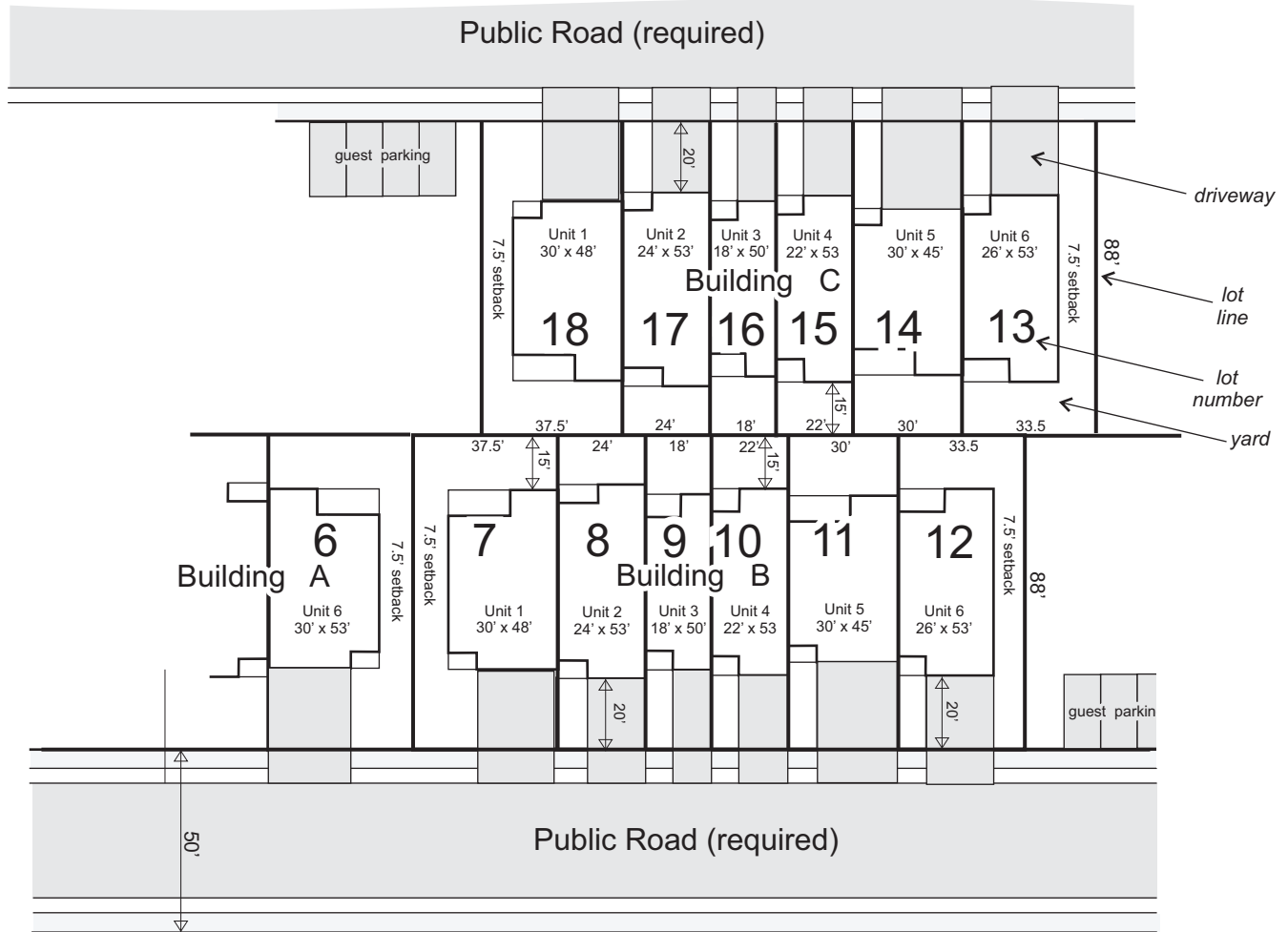
C. Zero Lot Line Development Conditions Table.

STANDARDS	SINGLE-FAMILY	DUPLEX	COTTAGE	TOWNHOUSE
Minimum Lot Area (per dwelling unit)	3,000 sf	3,000 sf	2,500 sf	3,000 sf 1,500 sf
Minimum Street Frontage (interior lot)	40 ft	30 ft	25 ft	30 ft 18 ft
Minimum Street Frontage (corner lot)	50 ft	40 ft	30 ft	40 ft 25 ft
Minimum Side Yard Setback	0 ft min for common wall/opposite side 15 ft (15 ft min between buildings)	0 ft min for common wall/opposite side 10 ft	5 ft/0 ft min for common wall/opposite side 10 ft	0 ft min for common wall/end wall 15 ft 7.5 ft
Front Yard	20 ft	20 ft	10 ft	20 ft
Rear Yard	20 ft	20 ft	10 ft	25 ft 15 ft

Typical Townhouse Lots

6 Unit Buildings
Attached Townhomes on individual lots

(requires revisions to EMC 18.06.030 & EMC 18.06.130)



1" = 50'

1. Min Lot Area: 1,300sf
2. Min Street Frontage (interior lot): 18' (same as lot width)
3. Min Street Frontage (corner lot): 25'
4. Min Side Yard Setback (end wall): 7.5'
5. Min Front Yard Setback: 20'
6. Min Rear Yard Setback: 15'
7. Max building height: 40' (for 3 story units with aesthetic roof lines)

Samples - Typical Townhouse Lots

