



December 8, 2023

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

RE: Request to increase the allowable density and building height for multifamily uses in the zoning codes.

The currently allowed maximum density in the R-4 zone is 15 dwelling units per acre with a maximum building height of 30 feet and we believe that the R-4 zoning should be updated to allow a maximum density of 24 dwelling units per acre with a maximum building height of 45 feet.

I have provided some Zoning examples of allowed density and building height from surrounding Cities for reference (see Exhibit A attached). All these Cities include allowable densities that are higher than the 15du/ac that is the maximum allowed in the multifamily zone (R-4) of Enumclaw; these range between 20 to 40 du/ac. A maximum of the 15du/ac will limit the variety of housing product for future residents as well as the potential for a wider variety of Amenities on the sites because typically achieving higher unit counts will entice the developer to provide additional amenities to attract residents which is a critical consideration in a proforma of the overall project. It should be noted that many Cities are currently under a Comprehensive Plan Review and Update, therefore some of these City's zoning codes will be outdated by 2025.

Washington is (and has been) experiencing high levels of population growth and the King County Executive's Office has made it very clear that the County is looking at future growth occurring within the existing limits of the Cities. At the same time, most cities have very little if any undeveloped land remaining, therefore, reasonably increased densities for multifamily housing will be required to achieve the desired population growth throughout the County, and within each City in the foreseeable future.

The relationship between the allowed density and the allowed building height should be considered when a zoning category with an allowed density is developed. The maximum building height should not limit or restrict the allowable density from being achieved and should also allow for variable and flexible roof lines and not just flat roofs. In other words, A 30' maximum building height for three story buildings will either limit the ceiling height of the residential units to 7 or 8 feet and/or limit roofs to flat boring roof lines 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.

Most of the surrounding suburban Cities have zoning that allows for a variety of Low-Rise and Mid-Rise buildings for residential and/or commercial uses. Low-rise buildings are typically defined as being up to 3-4 stories high with a variety of allowed building heights (depending on who you talk to). Our experience is that for our three-story apartment buildings, they typically range from 18-24du/ac in density and need a minimum allowed building height of 40-45'. Some people might think that a building of 45' height would be a four-story building but that is not generally the case these days, in fact four story building would typically be 50-55' high. Multi-family residential buildings should include a variety of roof lines and shapes to improve the building aesthetics and to keep up with the market. A variety of roof lines, especially on larger buildings, makes the building appear to fit more of a "human" scale for the users and passers-by alike. No community wants larger bland buildings that look large and bland. 4 or 5 story buildings require a 60' allowed building height to allow for the proposed buildings to achieve the allowed densities and to be marketable in the trending markets.

We are finding that generally, the easy to develop sites are all gone and the remaining sites available for development are highly constrained. Required parking, drives, maximum impervious surface, drainage, open space and landscaping, not to mention critical areas and other constraints of sites for any multi-family residential development, dictates that only a limited portion of the overall property can actually be buildings, therefore an appropriate allowed building height must be incorporated into the zoning codes to allow flexibility in building stories and heights so as not to contradict with the allowed density within that zoning.

In conclusion, we are asking that the City consider increasing the allowed density within the R-4 (and any other zone that allows multi-family units) to 24du/ac and a related maximum building height of 45' to match.

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

Sincerely,



Jef Potter

Director Of Land Development

INTEGRITY LAND LLC

EXHIBIT A

Zoning Samples:

COVINGTON (CMC 18.30.030):

R-18 (low rise multi-family zone)

- A base density of 18u/a with a maximum density of 24u/c with the use of density incentives (affordable, parks, trails, open space, art and other)
- A height of 35 ft with increased setbacks the maximum height is 70 ft

MR (low to mid rise multi-family zone)

- A base density of 14u/a with a maximum density of 50du/ac with the use of density incentives (affordable, parks, trails, open space, art and/or other)
- A height of 60 ft with increased setbacks the maximum height is 70 ft

MAPLE VALLEY (MVMC 18.40.030) :

R-18 (low rise Multi-family housing zone)

- A maximum density of 18u/a
- A height of 35 ft and up to 45 ft with the use of incentives (tree retention)

R-24 (low to mid rise Multi-family housing zone)

- A maximum density of 24u/a
- A height of 60 ft and an increase with the use of incentives (tree retention)

BUCKLEY (BMC 19.20.010):

HDR (low to mid rise multi-family zone)

- A maximum density of 20du/ac
- A height of 30 ft

AUBURN (AMC 18.07.030):

R-16 (low rise Multi-family housing zone)

- A maximum density of 16du/ac
- A height of 45 ft

R-20 (low to mid rise Multi-family housing zone)

- A maximum density of 20du/ac
- A height of 50 ft

KENT KMC (15.04.170):

MR-G (Low Density Multifamily Residential zone)

- A maximum density of 16du/ac
- 3 story/A height of 40 ft

MR-M (Medium Density Multifamily Residential zone)

- A maximum density of 23du/ac
- 3 story/height of 40 ft

MR-H (High Density Multifamily Residential zone)

- A maximum density of 40du/ac
- 4 story/height of 50 ft

BLACK DIAMOND (Ten Trails) (BDMC 18.98.120):

MPD (all types of residential uses up to low rise Multi-family housing)

- A maximum density of 30du/ac with the use of density incentives (location, open space and/or other)
- A height of 45 ft.