

According to the proposed Residential Intensity Map, the Debarr Vista subdivision is slated to become R3 (Low/Medium Intensity Residential >8-15 dwellings per gross acre). In support of the map, the Land Use Designations Summary Table, page 6 of the Community Discussion Drafts, Residential, Low/Medium Intensity 8.1-15 (dwellings per gross acre), Compatible Implementation Zoning, R-3, NMU-1. Under Residential Designations, page 9, Low/Medium Intensity Residential, the subdivision zoning district is changed due to the proposed new language which states, "This designation is implemented by the R-3 zone." And goes on to list the Location Criteria (6 criteria).

I would like to comment on the Location Criteria. The subdivision consists of mostly single family homes and our streets do not see intensive use. I'm guessing that the average lot size in the area is approximately 10,000 sq/ft. 10th, 11th, 12th & Ermine streets serve local residents only. Based on the departments thinking my neighborhood is slated to become R-3 because it meets the following Locational Criteria: (1) Area with a mix of single and multifamily housing, and/or mobile homes; (2) Areas within 1/4 mile of designated transit-oriented street corridors; (3) Areas once designated for intensive multi-family use that are characterized by single-family scale lots and homes.

Under the third locational criteria, the department proposes to use the term, intensive, to describe the intended density under current R-2M zoned districts. According to 21.40.045 R2-M multiple-family residential district. The following statement of intent and use regulations shall apply in the R-2M district: A. Intent. The R2-M use district is intended to be a medium-density urban and suburban multiple-family residential district, allowing up to eight dwelling units per acre on 20, 000-square-foot lots in the R-2M district (AMC 21.40-12). I think the department is intentionally not recognizing the original intent of the types of residential uses under R-2M. The departments use of the term, intense, to describe the type of density under current R-2M zoning is not supported by the code as a whole.

Under 21.40.045, R-2M multiple-family residential district, A. Intent, "...other needs of such areas are permitted in this district or are permissible as conditional uses subject to restrictions intended to preserve and protect its residential character." In order to preserve and protect the residential character of the R-2M zoned districts the code allows the following Permitted Principal uses and structures: 1. Single-family dwellings; 2. Two-family dwellings; and 3. Multiple-family dwellings.

Strict limitations, as to the number of structures, is limited to the size of the lot. For example, under permitted uses 1 and 2, more than one principal structure may be allowed on any lot or tract with an area of at least one acre; otherwise, only a single principal structure may be allowed on any lot or tract. To preserve and protect the intended character of the R-2M zoned neighborhood, multiple-family dwellings are strictly limited.

3. Multiple-family dwellings containing up to eight dwelling units. More than one principal structure may be allowed on any lot or tract with an area of at least one acre; otherwise, only a single principal structure may be allowed on any given lot or tract.

Under the current R-2M zoning district, to reach the minimum number of dwelling units proposed in the Title 21 draft, the minimum lot size for 8 dwelling units is 20,000 sq/ft. More than one principal structure may be allowed on any given lot or tract with an area of a least one acre, provided the number of dwelling units divided by lot area does not exceed the maximum standard set forth in the table in subsection F.1.c of this section; otherwise, only a single principle structure may be allowed on any lot or tract. I don't think the code is supportive of the locational criteria of an area once designated for intensive multi-family use. The provisions of the code are designed to protect, preserve, and support a mixed of housing types that are not intensive.

To protect and preserve the character of the R-2M residential neighborhood, Multiple-family dwellings may exist under numerous strict requirements such as Minimum yard requirements, Maximum lot coverage by all buildings, Maximum height of structures and so on. For example: G. 4. On lots in the R-2M district containing more than three dwelling units, there shall be a minimum of 400 square feet of usable yard per dwelling unit. No dimension of the usable yard shall be less than ten feet; H. Maximum lot coverage by all buildings is 40 percent; I. Except as provided in this title, no portion of a structure shall exceed 30 feet in height; M. On lots in the R-2M district containing more than three dwelling units, all areas not devoted to buildings, structures, drives, walks, off-street parking facilities, usable yard area or other authorized installations shall be planted with visual enhancement landscaping. I think the existing code is supportive of the conclusion, in looking at the entire section as a whole, that Multiple-family housing isn't intended as a primary type of housing but as an allowable type of housing in the R-2M zoned district.

At a recent meeting, Mr. Nelson, said that R-2M zoning is inefficient use of land. While he is entitled to his opinion I don't think the current code supports the departments contention that the R-2M zoned districts were ever once designated for intense multi-family use. If anything the current code forbids this contention.

In conclusion I think the rewrite process is getting a little too far ahead of itself with the blanket rezoning of R2-M zoned districts to the proposed R3 zoned districts. I think all R2-M zoned districts need to be identified and categorized based on majority housing type, density, traffic and noise. Then, with the majority concurrence of the property owners, a decision as to the type of zoning district that shall apply. This will mean that some R2-M zoned districts will be R1, R2, and of course, some will become R3. There will be some non-conforming issues and this can be addressed by using grandfather rights.

As far as the Debarr Vista Subdivision is concerned it should be rezoned R1.

Thank you.

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