

Residential Code Initiatives: Range of Alternatives

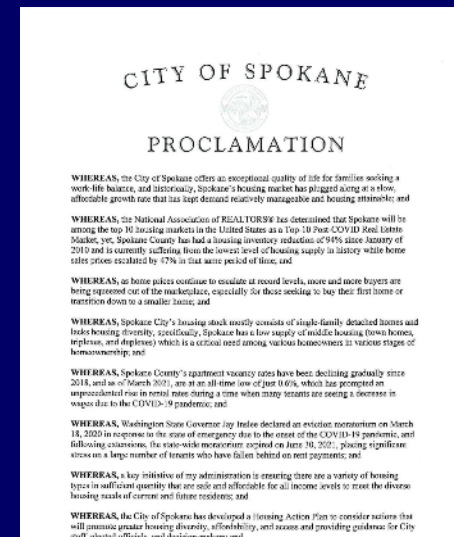
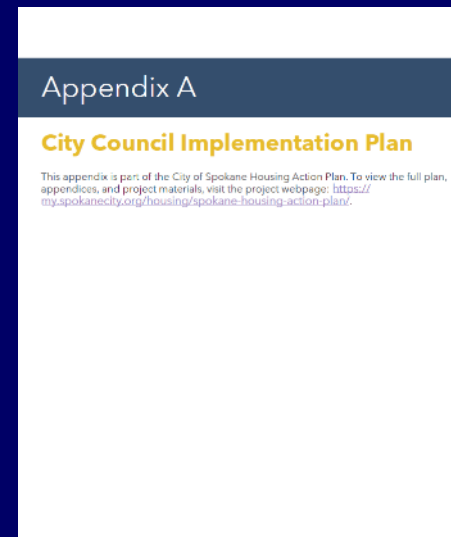
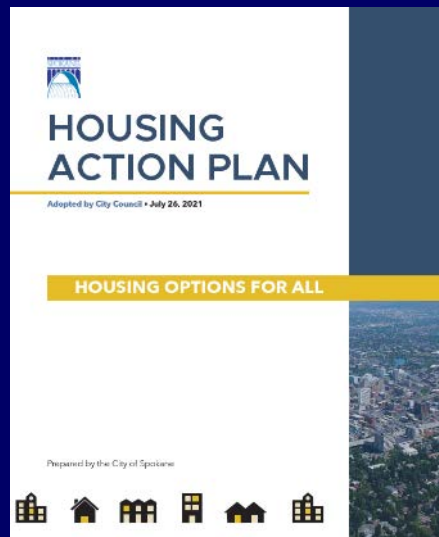
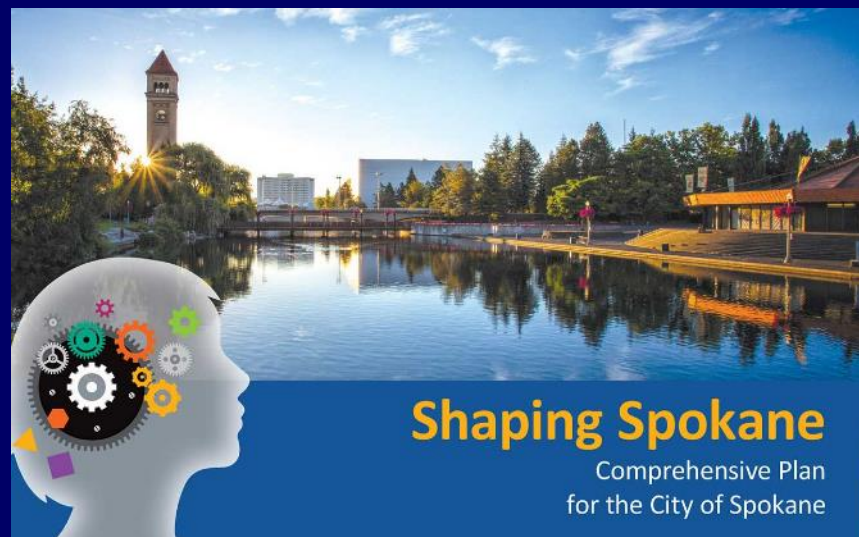
Plan Commission



Nate Gwinn & Amanda Beck | Assistant Planner IIs
Community & Economic Development — Planning Services
December 8, 2021



Guiding Documents



- **Comprehensive Plan**

- Adopted 2001
- Annual Amendment Cycle
- Periodic Updates
 - Last Updated in 2017
 - Next Major Update Due 2026

- **Housing Action Plan and Related Documents**

- Adopted July 2021 (Resolution No. 2021-0062)
- Appendix A: **City Council Implementation Plan**
- **Proclamation of Housing Emergency**

Housing Options – Continuum of Different Types



Cottage Housing

Southeast Boulevard

East 35th Avenue

04/01/2014

© 2014 Pictometry



Cottage Housing





Past Residential Code Amendments

- 2006 Residential Code to Implement Comprehensive Plan
 - Cottage Housing, Attached Housing
 - Detached Accessory Dwelling Units
- 2012 Infill Housing Task Force
 - RSF-Compact Zone | Garage Wall Limitations
 - Pocket Residential Development (Except RA & RSF Zones)
- 2014 Unit Lot Subdivisions - Pre-Existing Development
- 2018 – 2019 Infill Development Code Revisions
 - Cottage Housing
 - Pocket Residential and Compact Lots Added to RSF Zone
 - Attached Homes, Parking Transitions
 - Height Exceptions, Wall Height in Higher-Density Zones (RMF & RHD)



2017 Open House



Proposed Amendments

Phase 1

- More Flexibility - New Residential Development
 - Lot Sizes, Duplexes, Attached Housing (Townhouses), Accessory Dwelling Units
 - Short Term Rentals in Commercial Zones
- Streamlined Permitting
 - Updated Subdivision and Environmental Review Thresholds

Phase 2

- Changes may require Comprehensive Plan amendments
 - Additional housing types (plexes)
 - Additional density/zones
 - Increase number of homes faith institutions can build affordable to low-income households (<80% median family income)

Proposed Amendments

New Residential Development



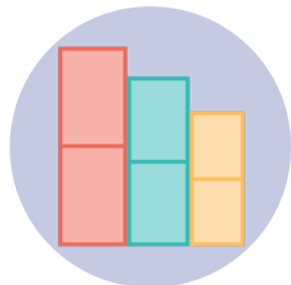
Accessory Dwelling Units



Duplexes

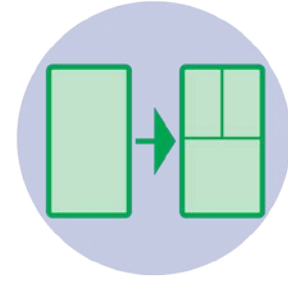


Attached Homes



Lot Size Transitions

Permit Processes



Short Plats

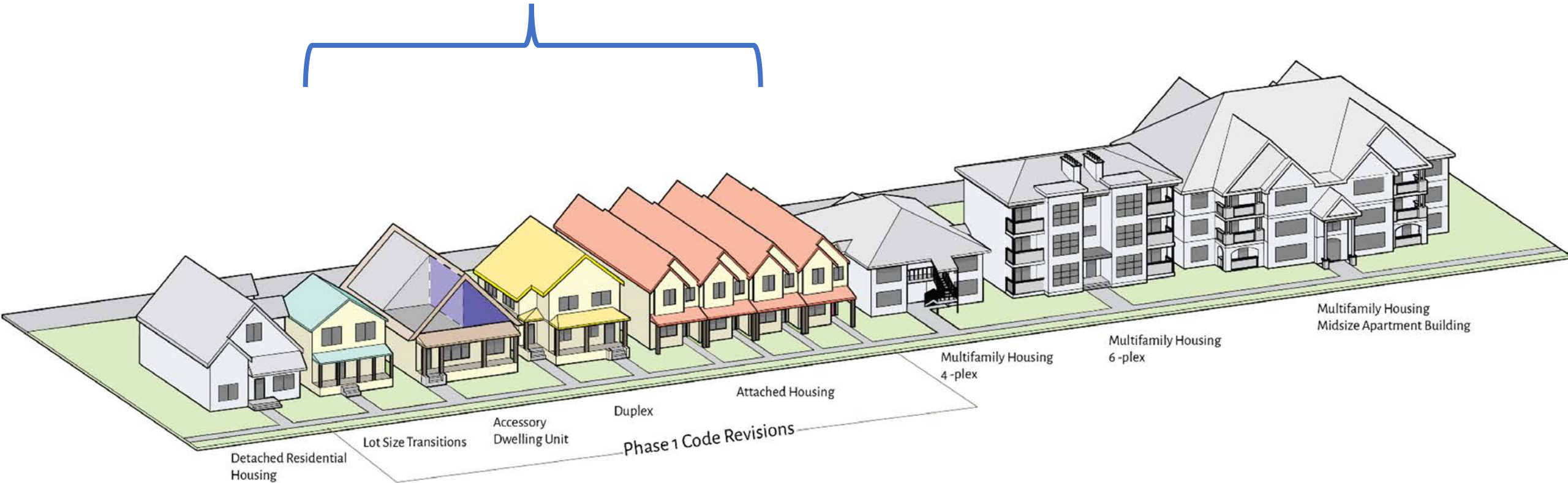


Short Term Rentals



SEPA

Phase 1 Housing Types





Public Engagement

- Pop-up in-person events
 - Spokane libraries
 - Winter Market in Riverfront Park
- Virtual topic open houses
 - Staff will outline the code amendments
 - Invite identified stakeholder groups that align with Housing Action Plan working groups
- Project webpage (going live soon)
 - Blog posts and City social media
- Interested parties email list
- Any comments received will be shared with Plan Commission to guide code amendments

New Residential Development



Accessory Dwelling Units (ADU)

Chapter 17C.300 SMC

- Current regulations allow one ADU as an accessory use in RA, RSF, RTF, RMF, RHD zoning districts
- 1991: WA Growth Management Act
 - Required local governments to incorporate “accessory apartments” in regulations
- 2001: Comprehensive Plan [Chapter 6 Housing](#), H 1.20 Accessory Dwelling Units
- Evolution of regulations favoring easing requirements/permitting
 - 1995: Internal ADUs allowed in Spokane
 - 2006: Attached and detached allowed in residential zones
 - Different approval process for some detached ADUs
 - 2011: Same application process for all ADUs

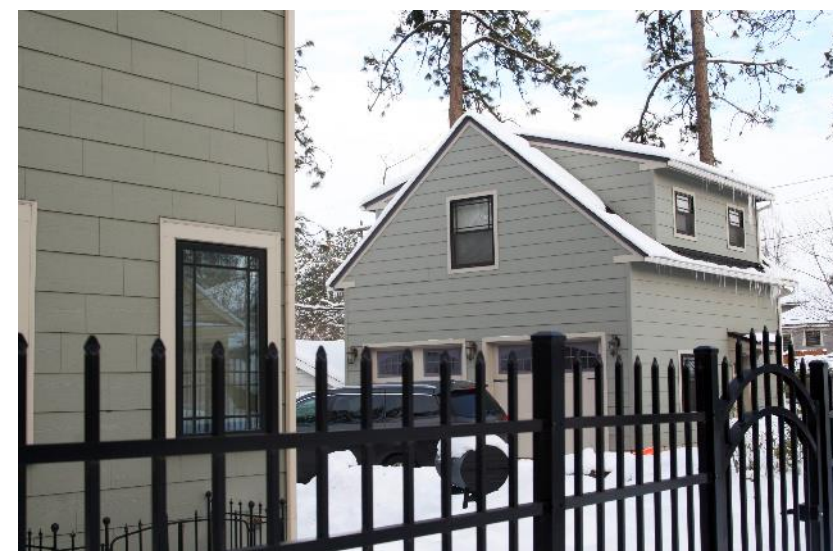
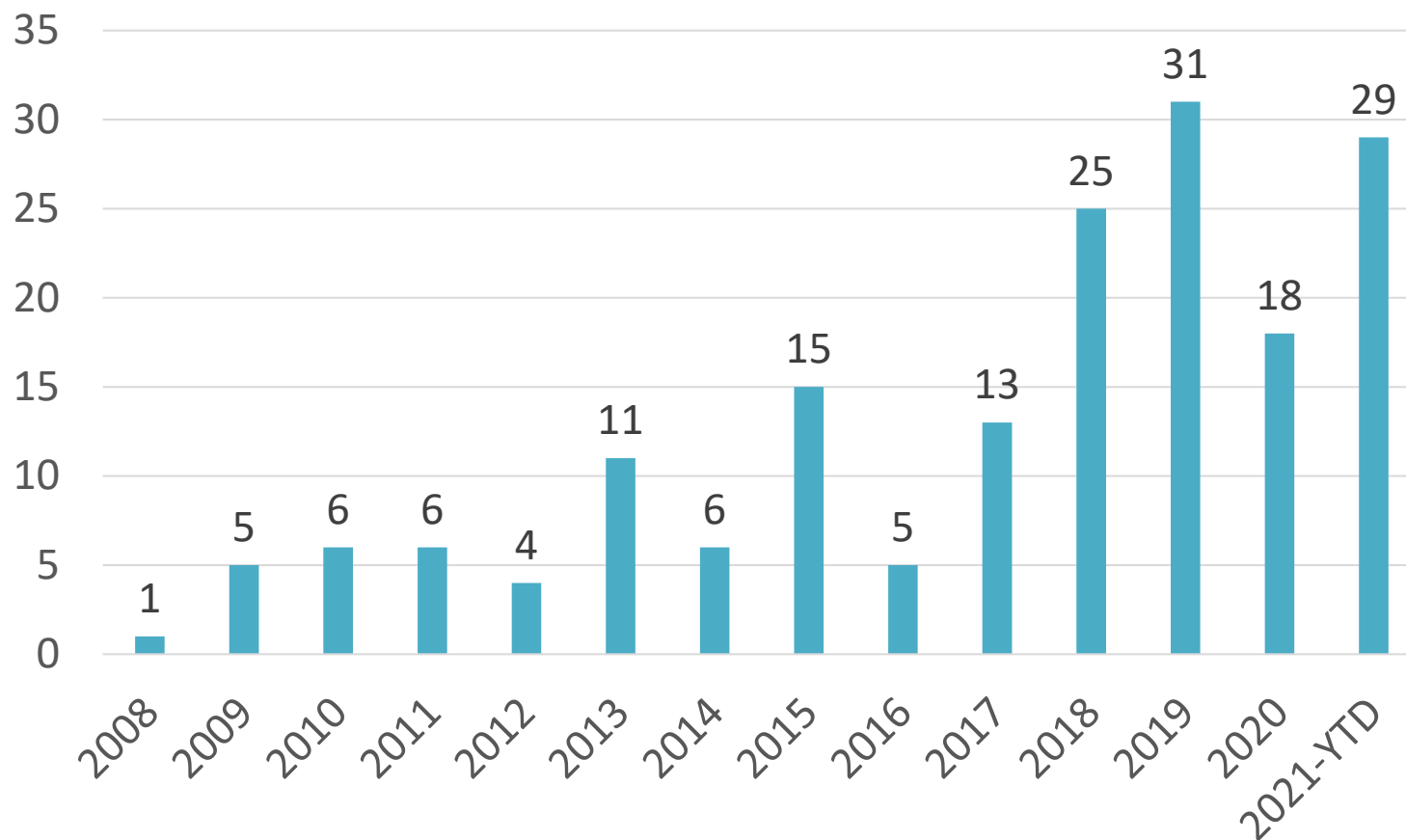




Accessory Dwelling Units (ADU)

Chapter 17C.300 SMC

ADUs Permitted by Year in City of Spokane
2008 to November 2021





Accessory Dwelling Unit: Overview

Planning & Development Services | P: 509.625.6300 | E: bdsinfo@spokanecity.org

Spokane Municipal Code § 17C.300

Definition

Accessory Dwelling Unit (ADU): A separate additional living unit, including separate kitchen, sleeping, and bathroom facilities, attached or detached from the primary residential unit, on a single-family lot. ADUs are known variously as: "Mother-in-law apartments," "Accessory apartments," or "Second units."

What zones can this tool be used in?

Zoning	RA	RSF	RSF-C	RTF	RMF	RHD
Accessory Dwelling Unit						

What housing types are allowed?

Attached and detached accessory dwelling units are permitted with the following limitations:

1. Only one ADU is allowed per lot as an accessory use to a single-family home.
2. A detached ADU must either be combined with a garage or shall be the only detached structure in the rear yard setback area.

How do I apply for an ADU?

1. Submit an ADU application and fee.
2. Receive an ADU application approval letter
3. Submit this letter to be recorded at the County Auditor's Office as a deed restriction
4. Submit a conformed copy of the recorded letter to the City's Planning Dept. prior to the issuance of a building permit or safety inspection.
5. Obtain a building permit and certificate of occupancy

[Complete ADU Application Procedures]

Development Standards

Min. Lot Size: [5,000 sf.](#)

Bulk Limitations: The ADU cannot be larger than the primary dwelling unit. The building coverage of all [detached accessory structures](#) may not exceed 15% of total lot area.

Development Standards Continued

ADU Size Requirements:

	Min. Size	Max. Size
Internal ADU*	250 sf.	800 sf.
Detached ADU	N/A	600 ft.

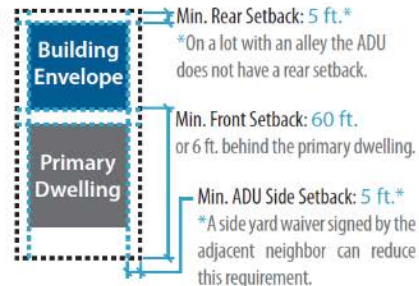
*The footprint of the principal structure, excluding an attached garage, must be not less than 800 sf. Internal ADUs may not exceed 50% of the total square footage of the principal structure's building footprint.

Max. Building Height:

	Max. Wall Height	Max. Roof Height
Detached ADU	10 ft.	20 ft.
Detached ADU Over Accessory Building	16 ft.	23 ft.

Parking: ADUs require [one additional parking space](#). Existing required parking for the house ([one space](#)) must be maintained or replaced on-site.

Setbacks:



Occupancy: The owner of the property shall occupy one of the units as their principal residence and must occupy the dwelling unit for more than six months of each year. [Occupancy Requirement]

Other Development Standards: ADUs must adhere to Site Development Standards relating to [Conversion of Existing Detached Structures](#), [Windows](#), [Floor Area Ratio](#), [Entrances](#), [Finishes](#), and [Utilities](#). [ADU Development Standards]



▲ Detached ADU | Courtesy of [accessorydwellings.org](#)



▲ Detached ADU Over Accessory Building | Logan - Spokane, WA

References:

[Spokane Municipal Code \(SMC\)](#)

[[Accessory Dwelling Units SMC § 17C.300](#)]

[[Accessory Structures SMC § 17C.110.225](#)]

Design Inspiration

[[City of Seattle - A Guide to Building a Backyard Cottage](#)]

[[AccessoryDwellings.org](#)]

General standards are shown. Please refer to the Land Use Code for exceptions and specific regulations. Generally, all points of the building reviewed under the Residential building code will be required to be within 150 feet of a curb for fire access, or will require fire suppression sprinklers.

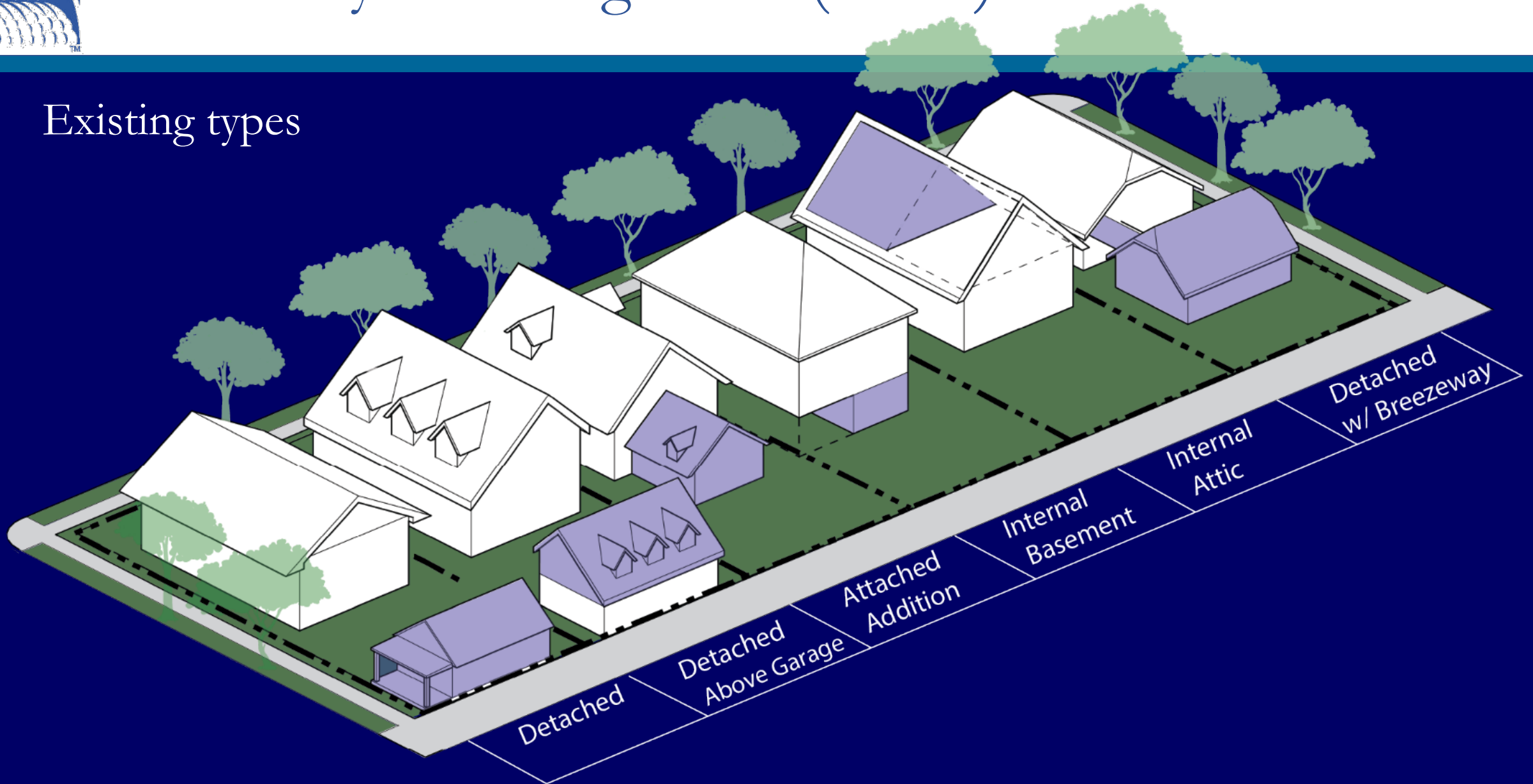
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Spokane Infill Housing Toolkit



Accessory Dwelling Units (ADU)

Existing types





Accessory Dwelling Units (ADU)

- More flexible size/dimension
- Add flexibility to design/roof form
- Reduce parking requirements
- Explore removing owner occupancy/covenant requirement



Housing Action Plan Strategy A5 (p. 33)



City Council Implementation Plan Strategy III.2



Proclamation Addressing Housing Emergency 2.g



RCW 36.70A.600 Increasing residential building capacity



Accessory Dwelling Units

- Dimensional standards
 - Increase maximum ADU size
 - Eliminate or reduce 5,000 sf minimum lot size
 - Adjust FAR formula for <5,000 sf lots
 - Increase allowed wall height
 - Design standards adjustments

Current Spokane ADU maximum size = 600sf
Many WA cities allow larger ADUs:

- Wenatchee: 800 sf
- Bellevue: 800 sf
- Everett: 800 sf
- Seattle: 1,000 sf
- Vancouver: 800 sf
- Anacortes: 900 sf

Out of state:

- Bozeman, MT: 600-800 sf
- Boise, ID: 700 sf
- Bend, OR: 800 sf
- Portland, OR: 800 sf

Also – Max ADU lot coverage of 15% prevents ADUs with a large footprint; Consider relaxing standard while ensuring minimum usable open space.



Accessory Dwelling Units

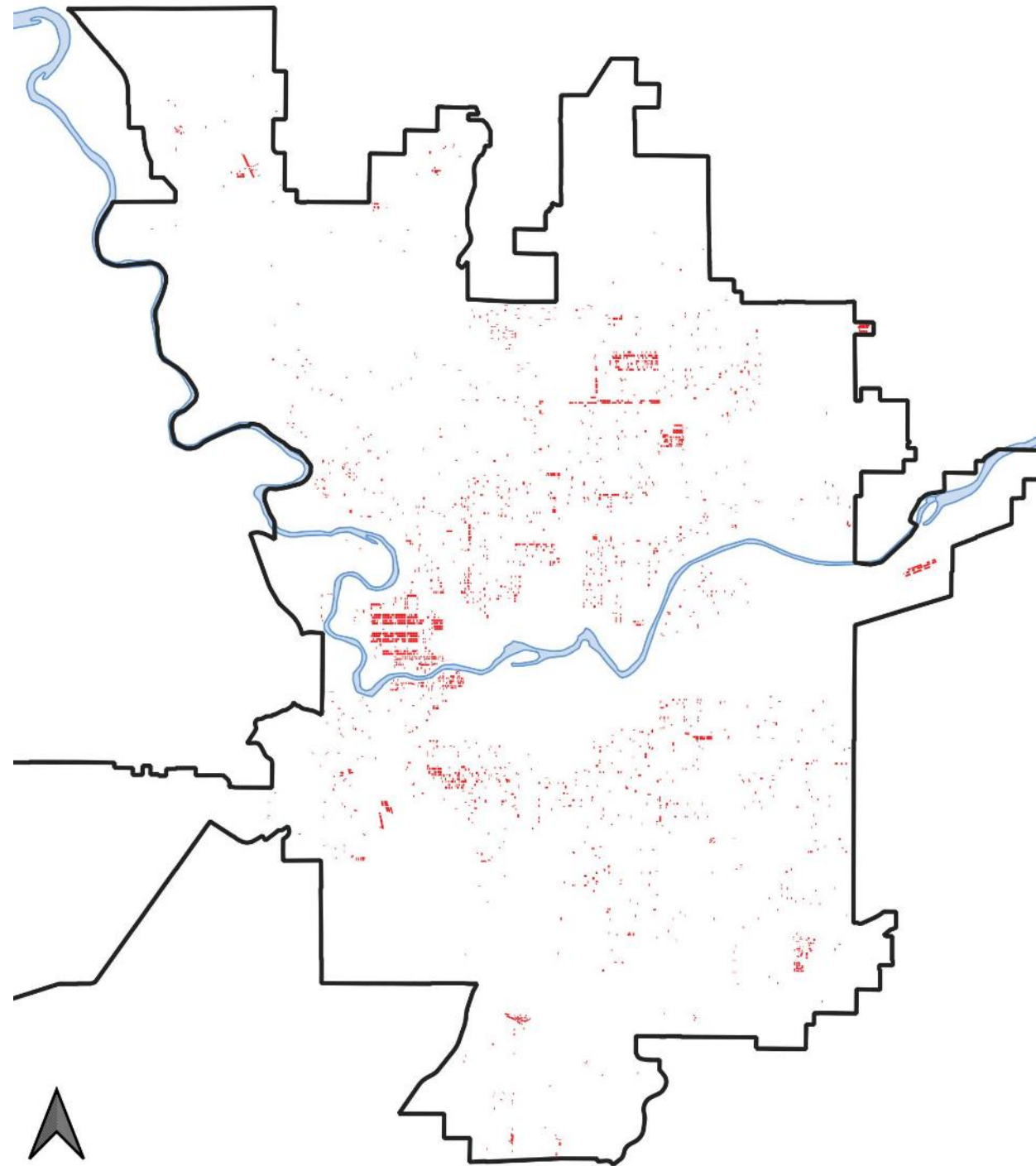
- Dimensional standards
 - Increase maximum ADU size
 - Eliminate or reduce 5,000 sf minimum lot size
 - Adjust FAR formula for <5,000 sf lots
 - Increase allowed wall height
 - Design standards adjustments

Minimum lot size for an ADU is 5,000 sf in Spokane.
Many WA cities do not have a minimum lot size.

- Wenatchee: none
- Bellevue: none
- Everett: none
- Seattle: 3,200 sf (DADU) none (AADU)
- Vancouver: 4,500 sf
- Anacortes: none

The 15% lot coverage maximum effectively prevents ADUs on very small lots.

There are about 3,800 R-zone lots
between 3,000 and 5,000 sf
(highlighted red in map)



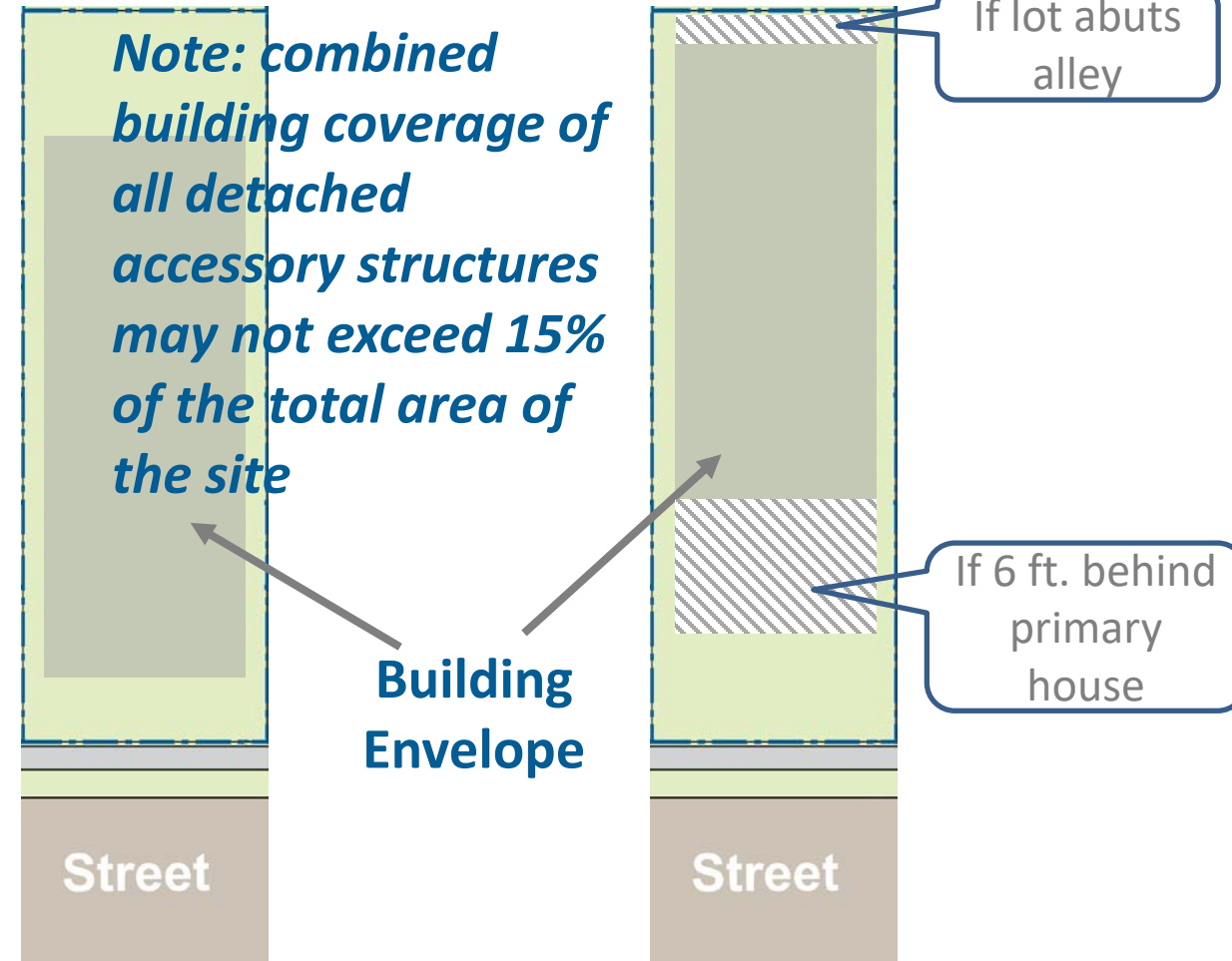


ADU: Setbacks and Floor Area Ratio

- Min. ADU lot area
 - In all Residential zones = 5,000 sf
- Min. lot area – detached house
 - RSF = 4,350 sf
 - RTF = 1,800 sf
- Floor Area Ratio (FAR):
 - The amount of floor area in relation to the amount of site area
 - FAR in RSF, RTF = 0.5
 - No FAR in RMF & RHD zone
- The ADU space **is counted** as part of the Floor Area Ratio (FAR)

Primary Structure
+ Attached ADU

Detached ADU



Example Lot



Accessory Dwelling Units

- Dimensional standards
 - Eliminate or reduce 5,000 sf minimum lot size
 - Adjust FAR formula for <7,200 sf lots
 - Consider adjusting the FAR formula to 0.6 for lots <7,200 to allow adequate house size with an ADU on site.
 - Increase allowed wall height
 - Design standards adjustments

FAR limit of 0.5 for RSF & RTF lots constrains ADU options on smaller lots.

Lot size	FAR 0.5 (max home size)	FAR 0.5 less 600 sf (max home size with ADU)	FAR 0.6 (possible home + ADU size)
3,000 sf	1,500 sf	900 sf	1,800 sf
4,350 sf	2,175 sf	1,575 sf	2,610 sf
5,000 sf	2,500 sf	1,900 sf	3,000 sf
7,200 sf	3,600 sf	3,000 sf	4,320 sf
10,000 sf	5,000 sf	4,400 sf	No change to max 0.5 suggested for house + ADU

- USA average new detached house size is 2,400 sf.
- USA average existing home size (including apartments) is ~1,600 sf.



Accessory Dwelling Units

- Dimensional standards
 - Eliminate or reduce 5,000 sf minimum lot size
 - Adjust FAR formula for <5,000 sf lots
 - Increase allowed wall height
 - Design standards adjustments

Existing maximum wall height of 16' makes it difficult to build garage apartments ADUs.

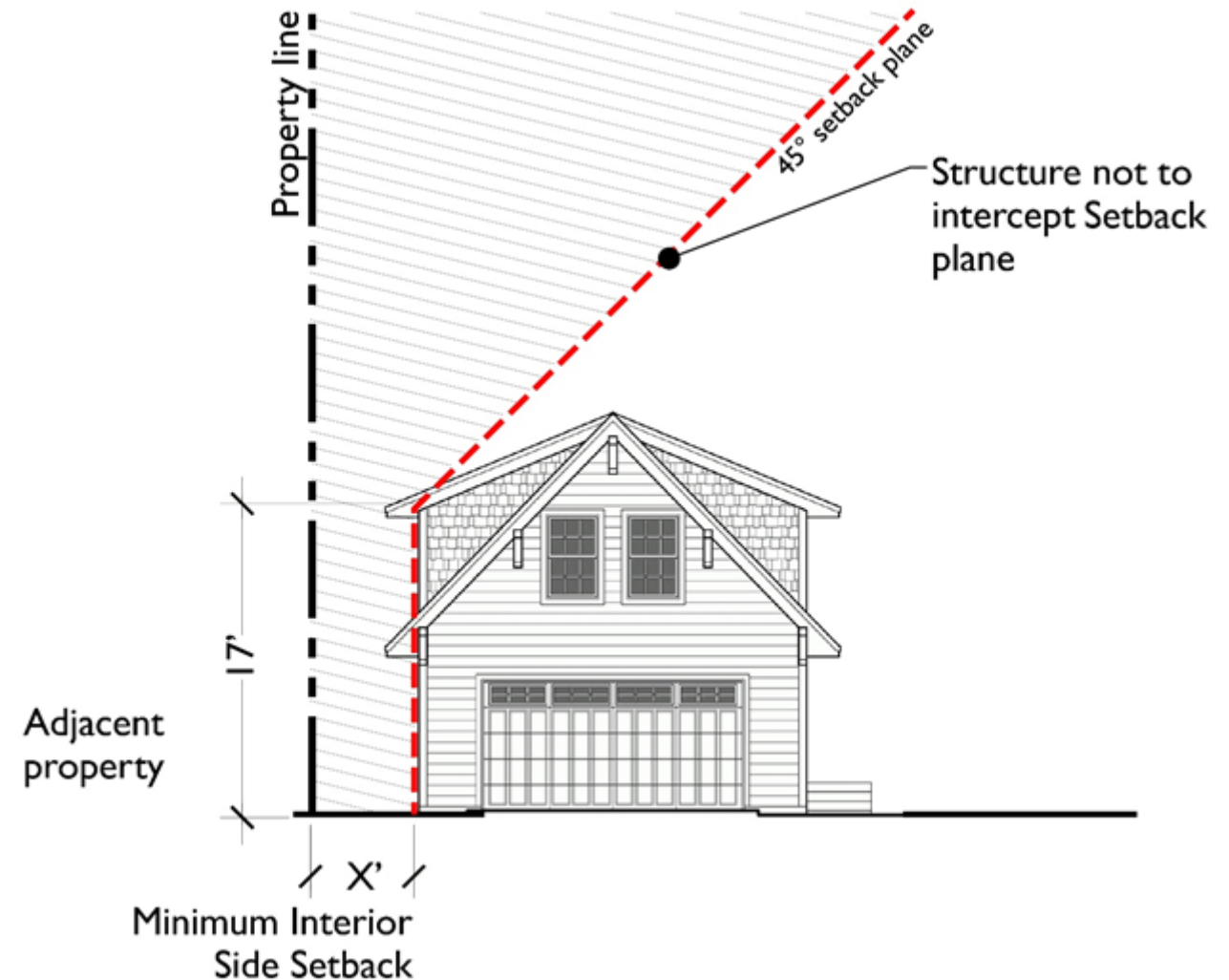
Builders say increasing maximum wall height to 17' would decrease construction costs.





Accessory Dwelling Units

- Dimensional standards
 - Eliminate or reduce 5,000 sf minimum lot size
 - Adjust FAR formula for <5,000 sf lots
 - Increase allowed wall height
 - Design standards adjustments
 - add setback plane stepback from minimum setback starting at 17'
 - greater flexibility around roof design

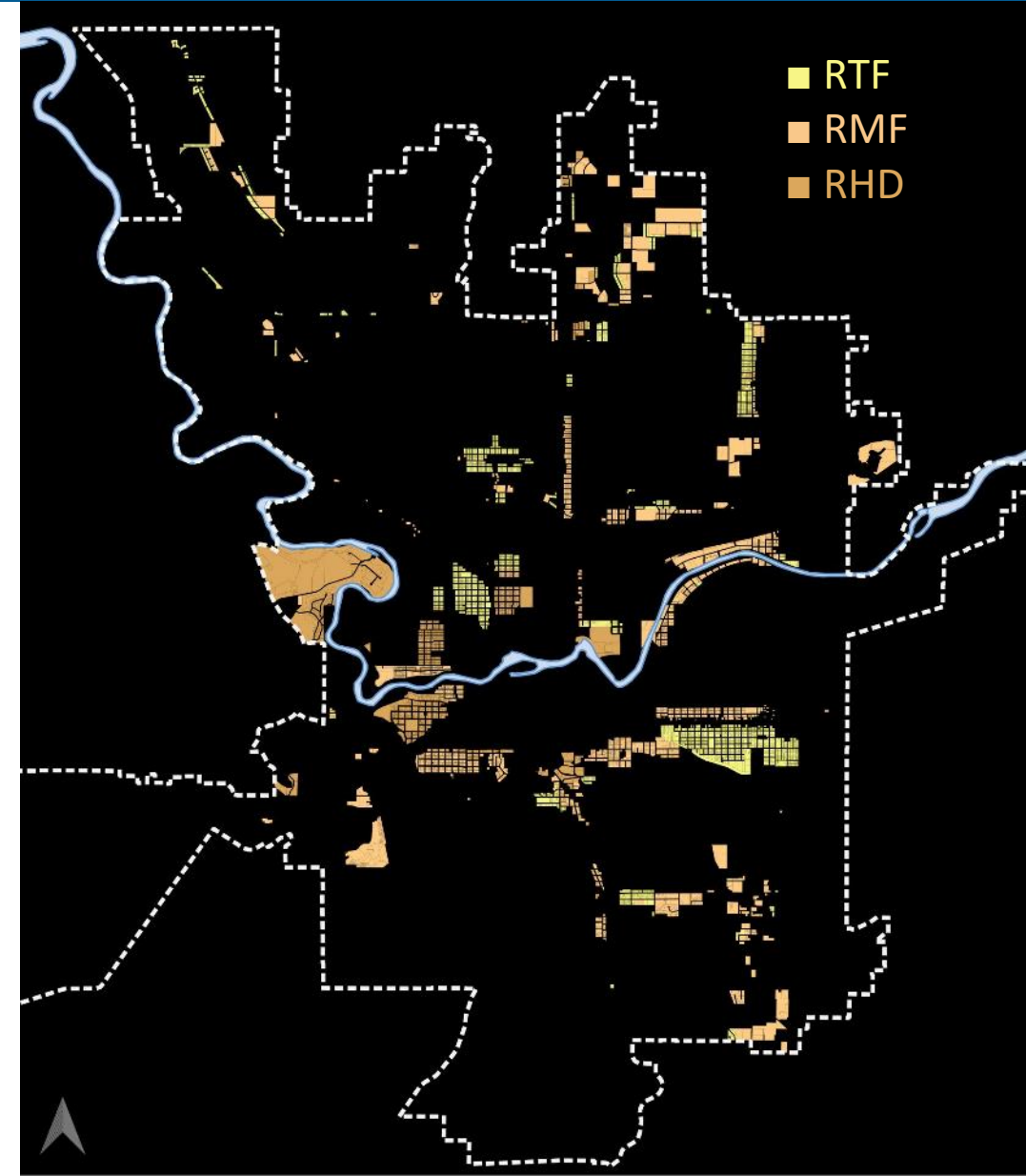




Accessory Dwelling Units

- Owner occupancy
 - Remove ADU owner occupancy requirement in RTF, RMF, and RHD zones
 - Time limited owner-occupancy limit on owner occupancy in RSF zones

These zones are already oriented towards rental housing types – removing owner occupancy requirement puts them more in line with zone intent.





Accessory Dwelling Units

- Owner occupancy

- Remove ADU owner occupancy requirement in RTF, RMF, and RHD zones
- Modify owner-occupancy requirement in RSF zones

Removing owner-occupancy requirements for ADUs makes them easier to build and reduces the enforcement burden for the city.

- Few cities use time-limited owner - occupancy requirements – such as a requirement for the first year of construction
- It is reasonably likely that the state legislature will eliminate owner-occupancy requirements in the coming years.



ADU Owner Occupancy: Example Ideas

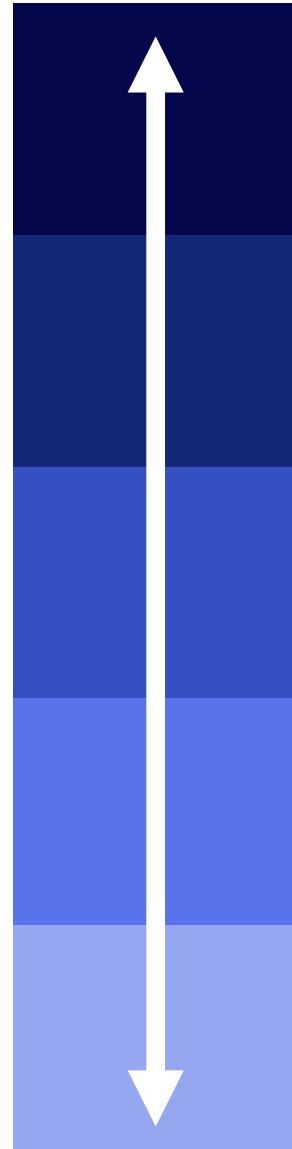
Eliminate requirement altogether

Allow sale after a period of time
(3 years?)

Only remove requirement for PUDs or
developments larger than a certain size

Remove requirement for RTF-RHD zones
But retain requirement for RSF zone

No change



Would allow for more production

Phases in rental tenancy

Add flexibility to new development

Add flexibility while keeping
majority of existing regulations

Less production



Accessory Dwelling Units

- Parking minimums

- No parking minimums with ¼ mile of frequent transit, per state law
 - Possible to still require parking if in an area where there is no availability of on-street parking
- No parking minimums for studio or 1-bedroom ADU

RCW [36.70A.698](#) and ESSB 6617, passed by the state legislature in 2020, removed parking requirements for ADUs within ¼ mile of a “major transit stop”.

Major transit stop defined as:

- **bus** or other transit mode providing fixed route service at **intervals of at least 15 minutes** during the peak hours of operation
- light rail
- commuter rail
- bus rapid transit routes or routes that run on high occupancy vehicle lanes

Boise updated ADU code in 2019 to only require 1 off-street parking space for 2-bedroom ADU's.



Other State Law Changes

- Remove cap on unrelated adults living together
 - Consider impacts to streets with scarce on-street parking availability due to too many adult residents

RCW [35.21.682](#), passed by the state legislature in 2021, prohibited city limits on the number of unrelated adults living together.



Duplex



Attached House





Duplexes in Residential Single Family Zones

SMC 17C.110.115
17C.110.310

- Not permitted in the RSF or RSF-C zones
- Must meet lot development standards for the base zone
- Max height is limited same as single-family
- Design standards to ensure compatibility with the existing neighborhood





Attached Housing / Duplex

Planning & Development Services | P: 509.625.6300 | E: bdsinfo@spokanecity.org

Spokane Municipal Code § 17C.110.310

[Text] = Hyperlink

Definition

Attached Housing: Two or more dwelling units that are single-family residences on individual lots attached by a common wall at a shared property line. These include: Townhouses, Row houses, and other similar structures.

Duplex: A building that contains two primary dwelling units on one lot. The units must share a common wall or common floor/ceiling.

What zones can these tools be used in?

	RA	RSF	RSF-C	RTF	RMF	RHD
Attached Housing	✓	✓	✓	✓	✓	✓
Duplex	✗	✗	✗	✓	✓	✓

[Housing Types Allowed Table]

Lot Development Standards

Each house must be on a lot that complies with the lot development standards in the base zone as provided in [SMC Table 17C.110-3].

Number of Attached Units:

RA, RSF and RSF-C Zones
>2 Requires a PUD



RTF Zone
>8 Requires a PUD



RMF and RHD Zones
No limit to the number of attached houses that may have common walls.



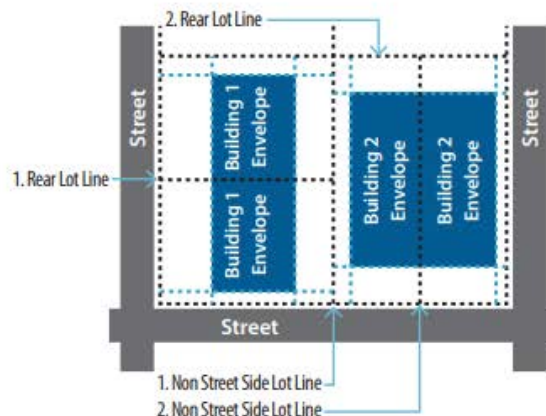
Setbacks

Setbacks:

Interior lots - The side building setback on the side containing the common wall is reduced to zero.

Corner lots - Either the rear setback or non-street side setback may be reduced to zero. However, the remaining street side lot line setback must comply with the requirements for a standard side or rear setback.

Example Site Setbacks:



Design Standards

Attached Housing and Duplexes: Attached Housing and Duplexes in RA, RSF, or RTF zones are subject to the design standards of [SMC 17C.110.310]. Attached Housing and Duplexes in RMF or RHD zones are subject to design standards of [SMC 17C.110.400-465].

Multi-family: Multi-family residential buildings containing three or more units are subject to the design standards of [SMC 17C.110.400-465].



▲ Brown's Addition Townhouse Style Units | Spokane, WA



▲ Kendall Yards Townhouse Style Units | Spokane, WA

References:

Spokane Municipal Code (SMC)
[Attached Housing, Detached Houses on Lots Less Than Forty Feet Wide, And Duplexes SMC § 17C.110.310]

Design Inspiration
[Portland - Infill Design Toolkit]
[Portland Courtyard Housing Design Competition]

General standards are shown. Please refer to the Land Use Code for exceptions and specific regulations. Generally, all points of the building reviewed under the Residential building code will be required to be within 150 feet of a curb for fire access, or will require fire suppression sprinklers.

Revised 2/2019

Spokane Infill Housing Toolkit



Duplex Locations: Example Ideas

- What areas are appropriate?
 - Close to centers/transit
 - New larger developments only
 - Corner lots only, where streets intersect
 - All lots



On corner lots, each unit oriented towards a different street



Housing Action Plan Strategy A1 (pp. 22-24)



City Council Implementation Plan Strategy III.3



Proclamation Addressing Housing Emergency 2.i



RCW 36.70A.600 Increasing residential building capacity



Duplexes

- Allow density exceptions for:
 - Corner duplexes, provided:
 - Driveways and entrances are from opposite streets and units have their own usable side or rear yard open space.
 - Duplexes within close-proximity to schools, parks & transit
 - All duplexes featuring units less than 1,200sf



Duplex example with garage, driveway and main entrances on opposite streets.

Current density limits discourage duplexes (by requiring 2x the area for a duplex as a detached single-family – 8,700 in the RSF zone)



Duplexes

- Allow density exceptions for:
 - Corner duplexes
 - Duplexes within close-proximity to schools, parks & transit
 - All duplexes featuring units less than 1,200sf



Duplexes surrounding a small park



Duplexes

- Allow density exceptions for:
 - Corner duplexes
 - Duplexes within close-proximity to schools, parks & transit
 - All duplexes featuring units less than 1,200sf



Small duplex units



Duplexes

Allow duplexes to count as a single dwelling in new subdivision provided such units are no more than 1,200sf

Place a cap % of such units to manage the maximum potential density.

*Example subdivision
integrating attached housing*

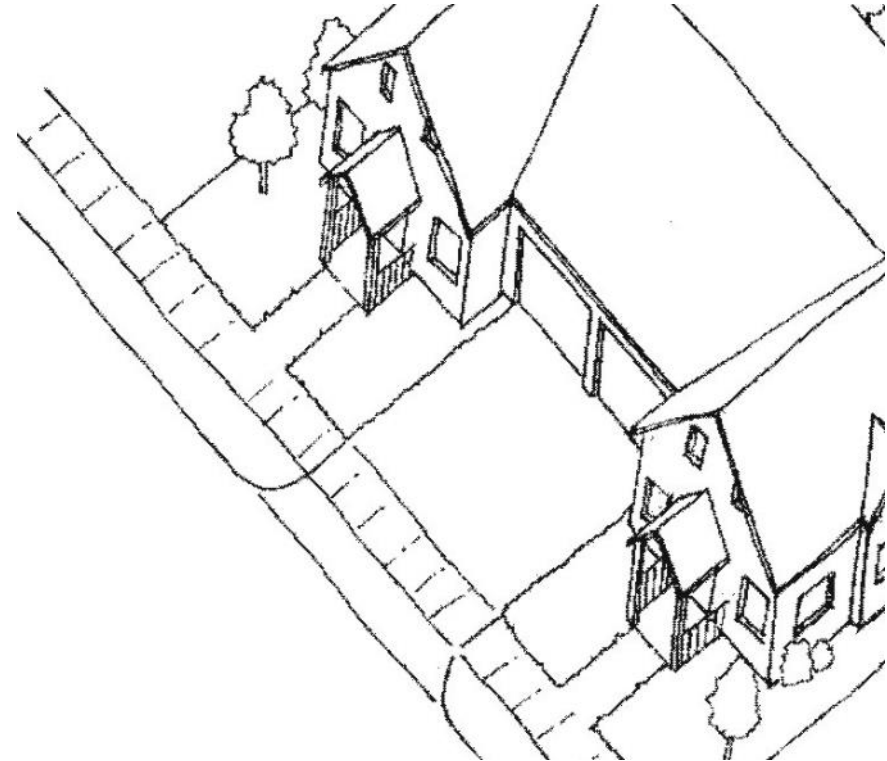




Duplexes

Design

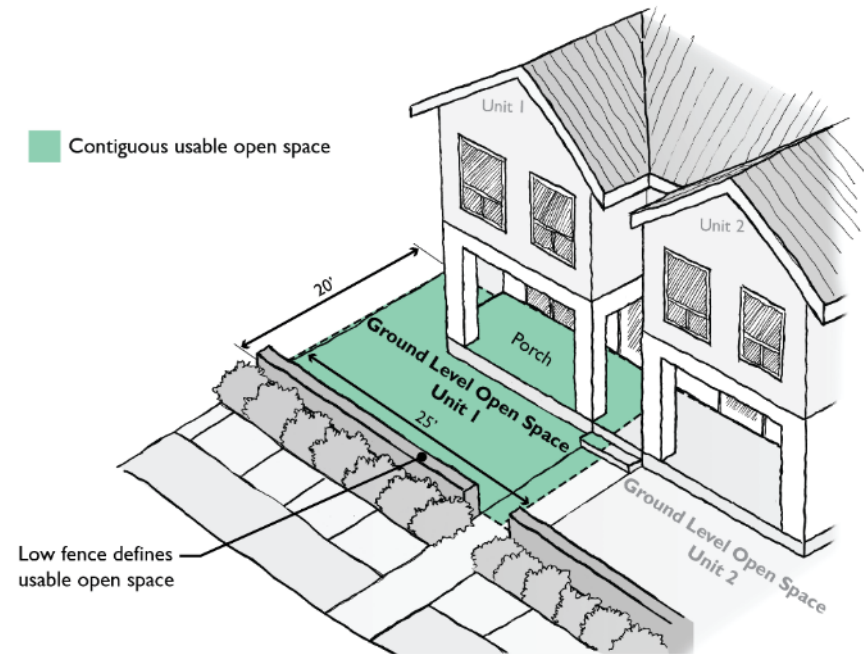
- Allow porches & covered entries to project up to 6' into the front setback
- Require minimum usable open space
- Garages & driveways
- Create a list of prohibited exterior materials



This provision encourages these desirable features by allowing them outside of ordinary roofline projections

Design

- Allow porches & covered entries to project up to 6' into the front setback
- Require minimum usable open space
 - Consider at least 10% of lot area with minimum 12' dimensions
 - Allow front yard to be used provided it's defined in the front by a low fence
- Garages & driveways
- Create a list of prohibited exterior materials

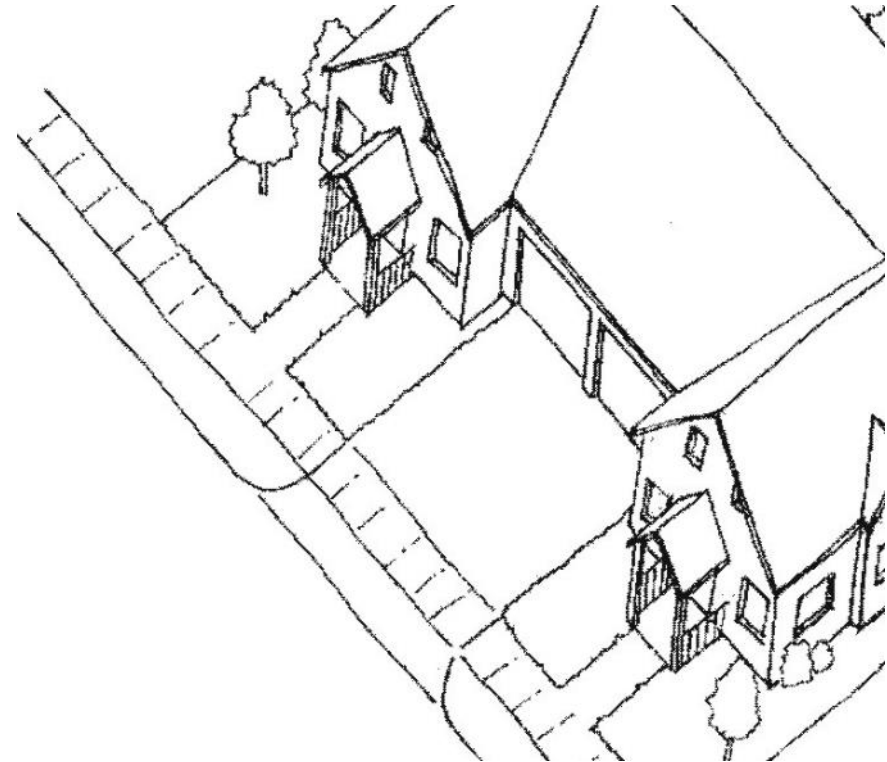


Example usable duplex open space in the front yard.

Duplexes

Design

- Allow porches & covered entries to project up to 6' into the front setback
- Require minimum usable open space
- **Garages & driveways**
 - Retain current 50% rule for garage wall/façade
 - Retain limitation on curb cuts
 - Where alleys are available, require alley access
 - Prohibit garages from projecting closer to the street than the house or front porch projection
- Create a list of prohibited exterior materials



Example duplex complying with driveway/garage provisions



Duplexes

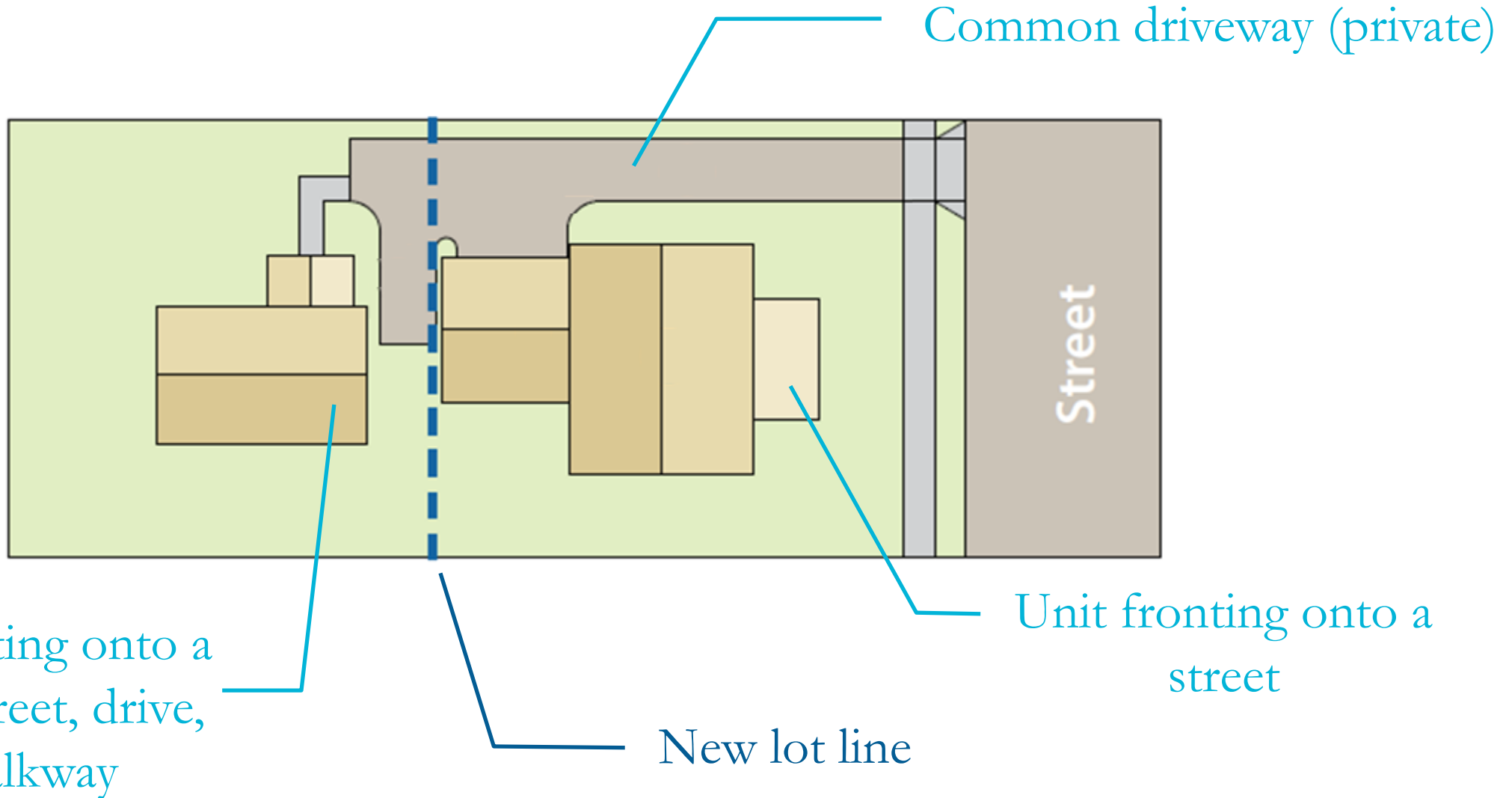
Design

- Allow porches & covered entries to project up to 6' into the front setback
- Require minimum usable open space
- Garages & driveways
- Other general design standards





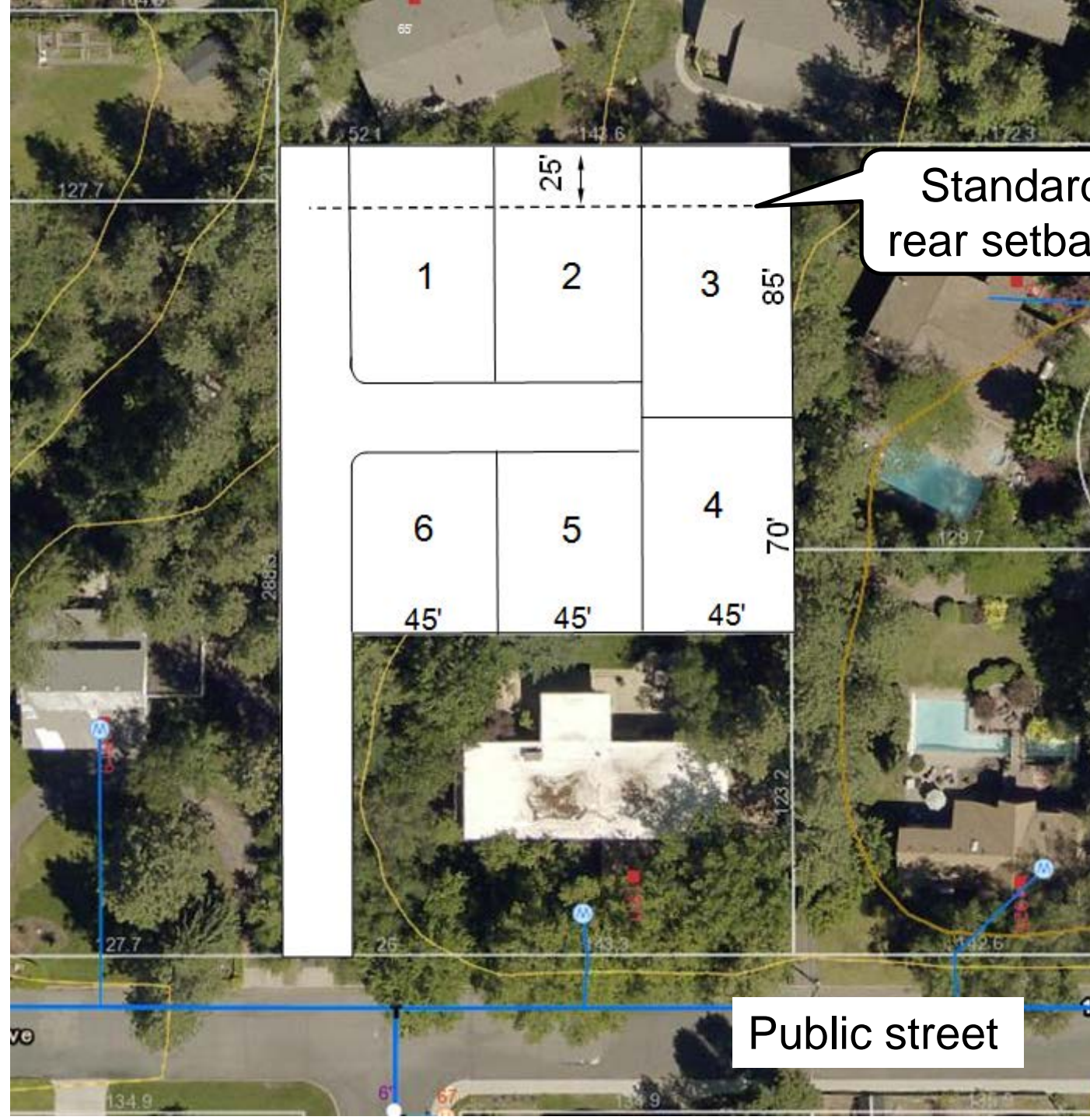
Pocket Residential Development





Pocket Residential Development







Pocket Residential Development

Planning & Development Services | P: 509.625.6300 | E: bdsinfo@spokanecity.org

Spokane Municipal Code § 17C.110.360

[Text] = Hyperlink

Purpose

The purpose of Pocket Residential Development (PRD) is to:

- Stimulate new compact infill housing that is compatible in scale and character to established surrounding residential areas.
- Create broader range of building forms for residential development and allow for frontage on to a private drive, alley, or walkway.

What zones can this tool be used in?

Zoning	RA	RSF, RSF-C, RTF, RMF, RHD, O, OR, CC, CA, NR, CB, and GC
PRD		

[Zoning Map]

Minimum Development Size:

RSF and RSF-C Zones: 8,700 sf. RTF Zone: 4,200 sf.

RMF and RHD Zones: 2,900 sf.

O, OR, CC, NR, CB, and GC Zones: No minimum

Maximum Development Size (RA, RSF, RTF): 1-1/2 acres
There is no maximum size in RMF, RHD, or Commercial zones. PRDs over one and a half acres in RSF or RTF must be approved as a planned unit development.

What housing types are allowed?

The housing types allowed in a PRD are those allowed in the underlying zone. [Housing Types Allowed Table]

How do I apply for a PRD?

- Attend a Predevelopment Conference
[Pre-Development Info Sheet] / [Pre-development Conference Application]
- Follow the processes outlined in the Predevelopment Conference to achieve your specific development goals.

Density

Min. and Max. Density: As allowed in the underlying zone.

Development Density Calculation:

$$\text{Density} = \left(\frac{\text{Number of Units}}{\text{Net Development Area}} \right)$$

[Calculate Residential Density]

Development Standards

Min. Lot Size within Development: No minimum lot size.

Max. Building Height: As allowed in the underlying zone.

Max. Building Coverage (All Buildings in Development)

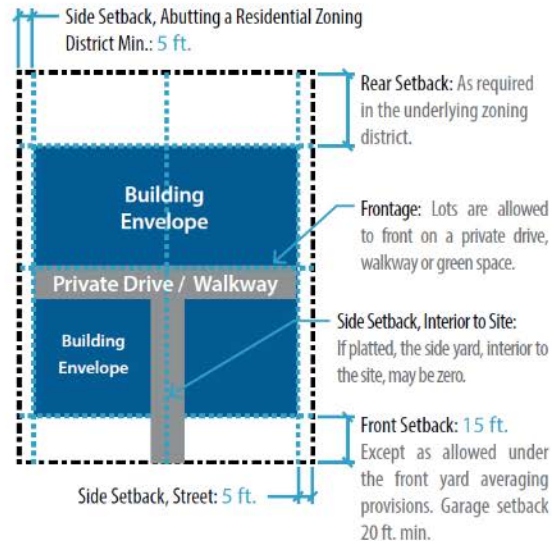
RSF, RSF-C, RTF, RMF, RHD: Varies by zone

O, OR, CC, NR, CB, and GC: Unlimited

Required Outdoor Area:

PRDs shall comply with the required outdoor area standards as required by the underlying zone. [Development Standards Table]

Example Development Setbacks:



Design Standards

PRDs must adhere to design standards relating to: Ground Level Access, Parking Lots, Lighting, Fencing, and Residential Building Design. [PRD Design Standards] In RMF, RHD and Commercial zones, multifamily design standards apply.



▲ Detached Residences with Frontage on Walkway | Kendall Yards - Spokane, WA



▲ Attached Residences | Kendall Yards - Spokane, WA

References:

Spokane Municipal Code (SMC)

[Lot Size Requirements - SMC § 17C.110.200]

[Pocket Residential Development - SMC § 17C.110.360]

Design Inspiration

[Portland - Infill Design Toolkit]

[Portland Courtyard Housing Design Competition]

General standards are shown. Please refer to the Land Use Code for exceptions and specific regulations. Generally, all points of the building reviewed under the Residential building code will be required to be within 150 feet of a curb for fire access, or will require fire suppression sprinklers.

Spokane Infill Housing Toolkit

Revised 2/2019

Attached Housing (Townhouses)

SMC 17C.110.115

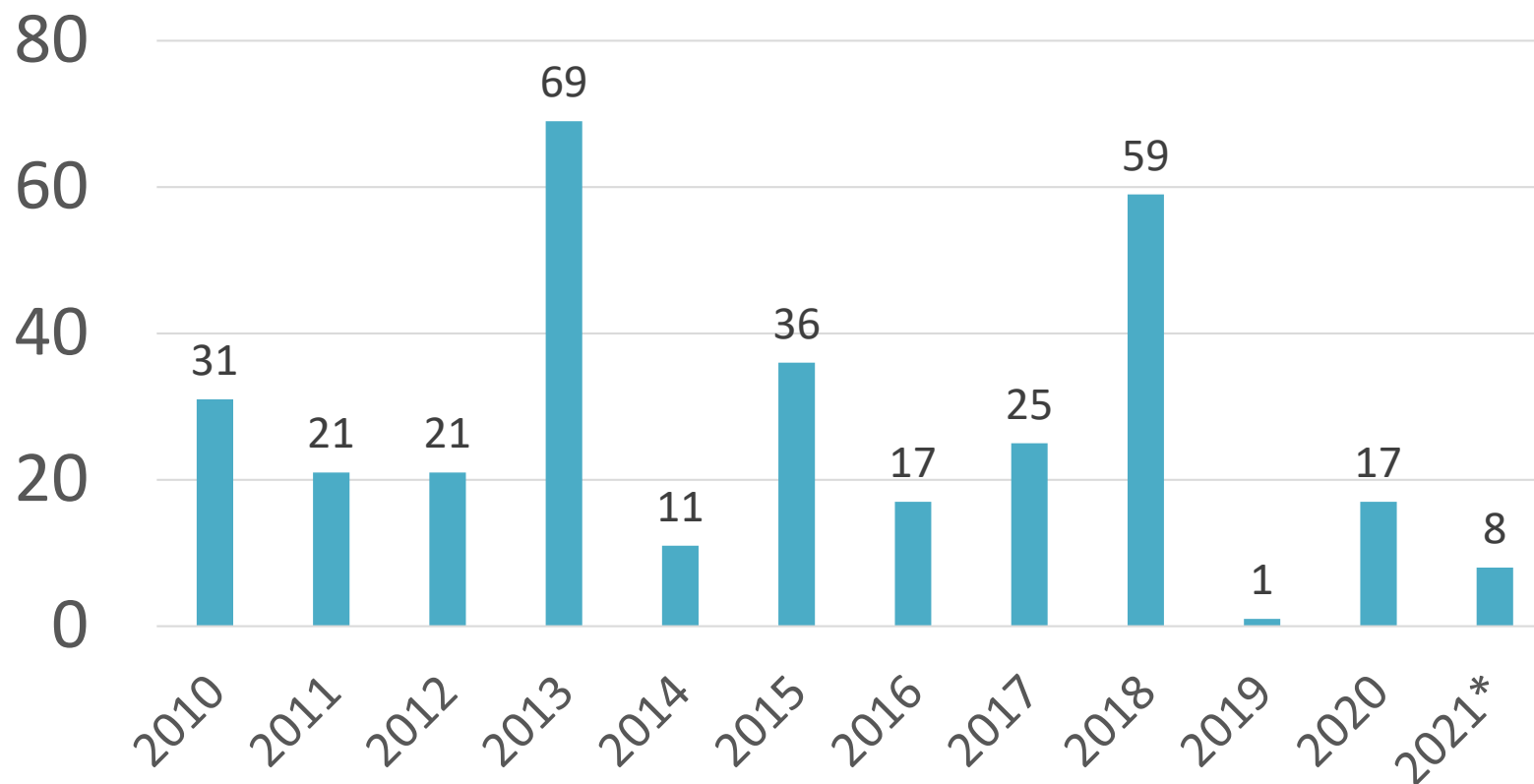
- Permitted in all residential zones
- Must meet lot development standards for the base zone
- Shared property line setback is reduced to zero (side or rear)
- Design standards to align with character of existing neighborhood
- Permitted units vary by zone





Townhouses

Attached Housing Units Permitted by Year
in Spokane
2010 to October 2021



Google Street View (bottom)



Townhouse Units: Example Ideas



- In RSF and RSF-C zones change max. number allowed to more than 2 without PUD process



Housing Action Plan Strategy A1 (pp. 22-24)



Proclamation Addressing Housing Emergency 2.b

Townhouses in New Subdivisions: Example Ideas

- Flexibility in new subdivisions
 - Allow more than two attached units in the RSF and RSF-C zones provided subdivision meets density limits
 - Allow units with no more than 1,200 square feet to count as $\frac{1}{2}$ dwelling unit



Example subdivisions integrating attached housing

Townhouses Infill: Example Ideas

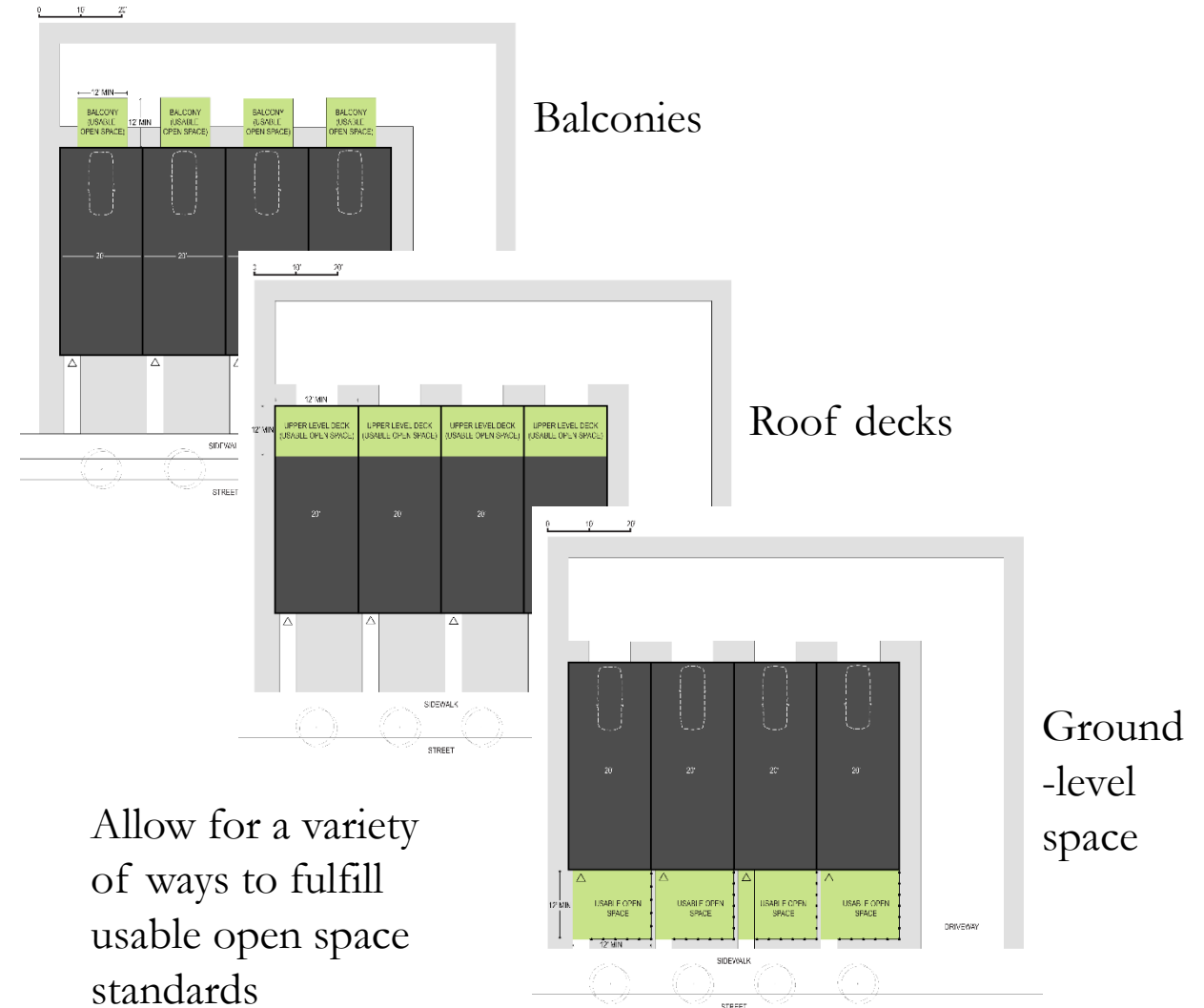
- Flexibility for infill development like exceptions for duplexes
- Allow density exceptions for:
 - Corner attached homes
 - Attached homes within close-proximity to schools, parks, transit, and centers and corridors
 - Attached homes featuring units less than 1,200 square feet



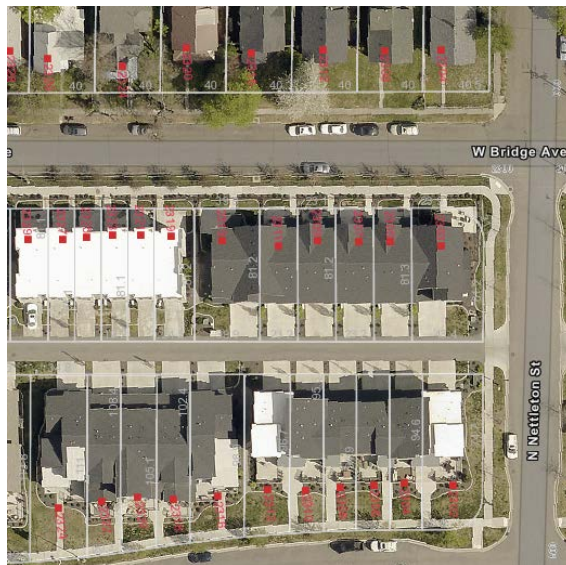
Townhouses integrated along the edge of a park.

Attached Housing Design: Example Ideas

- Add similar façade/building design standards as duplexes:
 - Allow porches & covered entries to project up to 6' into the front setback
 - Require minimum usable open space
 - Garage dominance
 - Other design standards

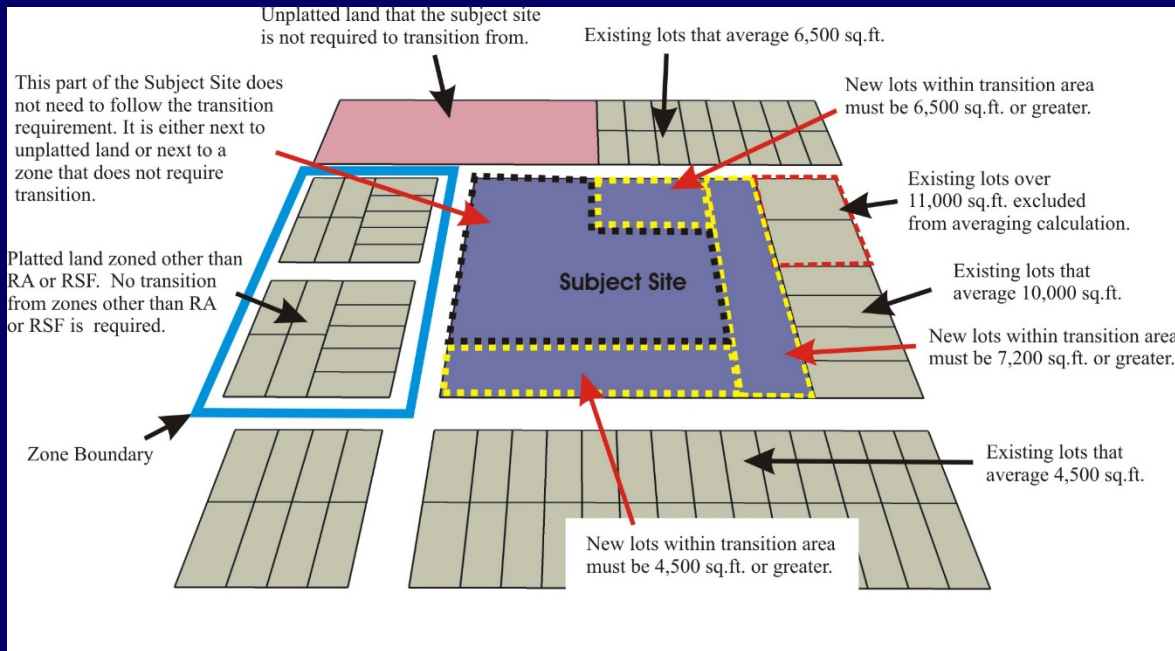






Lot Transition Standards

SMC 17C.110.200



- Only when subdividing sites ≥ 2 acres in RA and RSF zone
- Transitioning required if adjacent or across ROW from RA or RSF
- First 80-feet must transition
- If existing aver. lot size is $>7,200$ SF then transition lot size cannot be $<7,200$ SF
- If existing aver. lot size is $<7,200$ SF then transition lot size can be aver. or larger

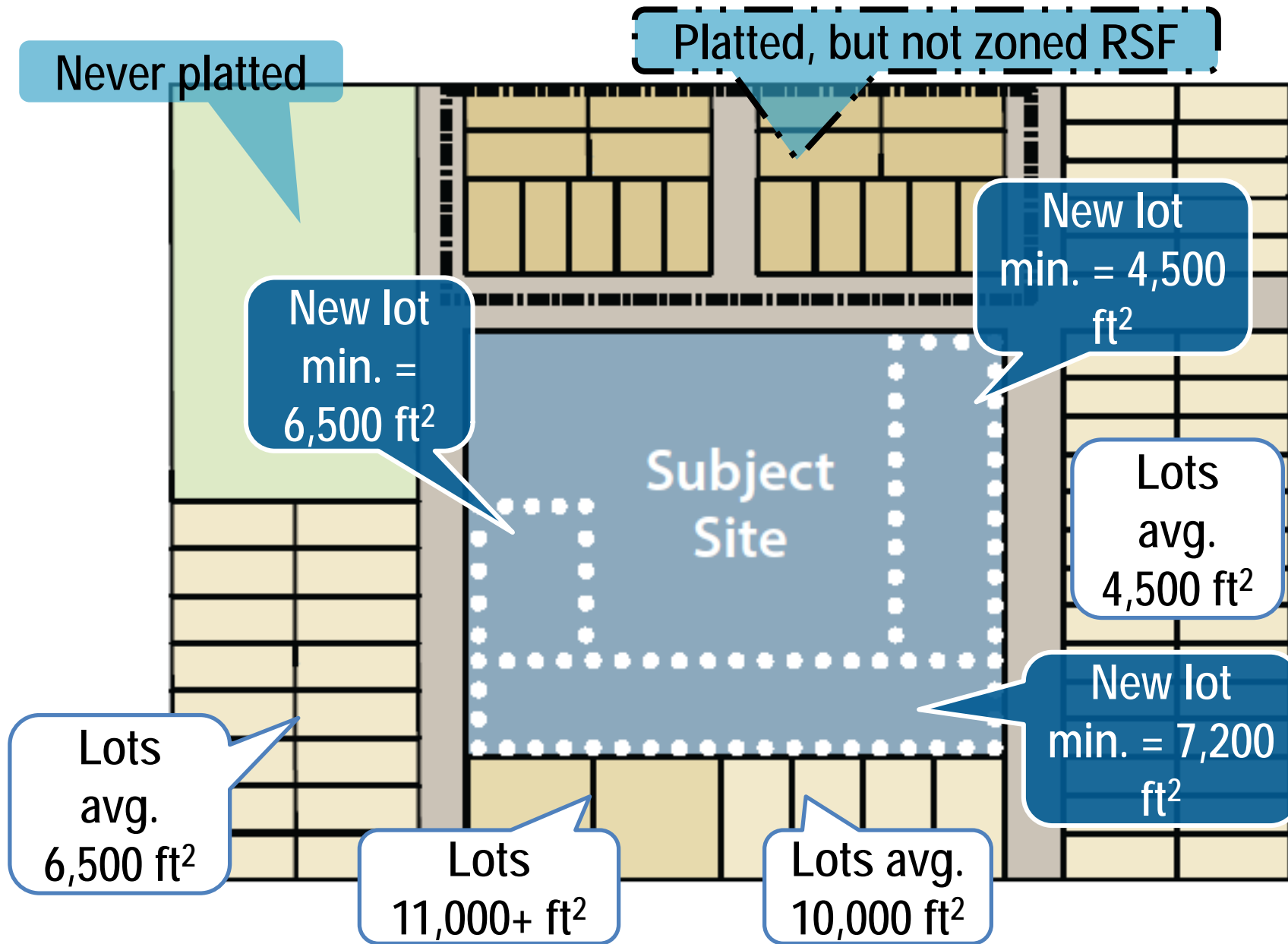


Purpose of Transitioning Lot Sizes

Meant to create a buffer between existing platted land and new subdivisions in order to **facilitate compatible development and a consistent development pattern**

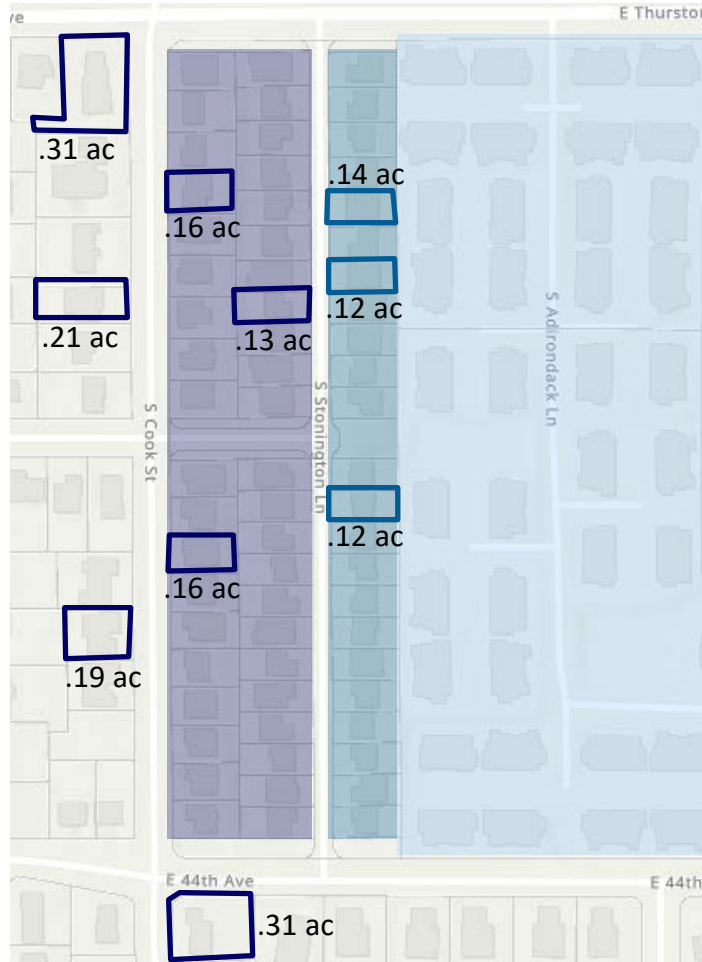


Transition from larger lots to smaller lots then multifamily.





Purpose of Transitioning Lot Sizes



Transition from larger to smaller lots then multifamily.

Meant to create a buffer between existing platted land and new subdivisions in order to **facilitate compatible development and a consistent development pattern**



Housing Action Plan Strategy A1 (p. 25)



City Council Implementation Plan Strategy III.10



Proclamation Addressing Housing Emergency 2.h



Lot Size Transition: Example Ideas

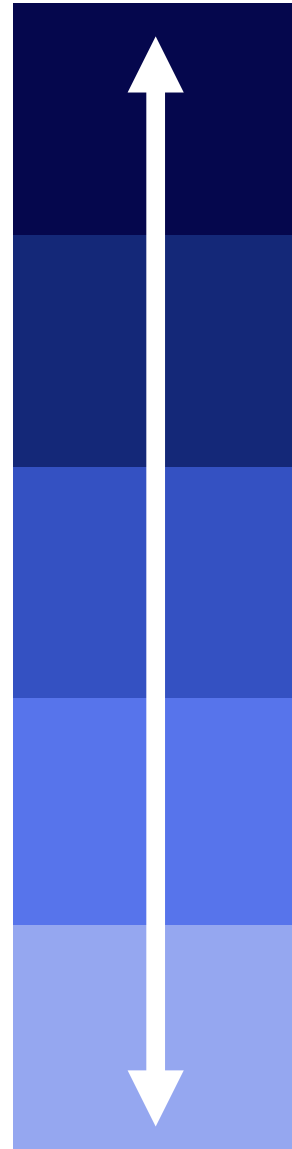
Eliminate requirement altogether

Transition lots cannot be smaller than 75% of the block average

Add size exception for natural topography and geography

Performance standards – vegetative buffers or limitation on adjacent yards

Only remove requirement across right-of-way; or for PUDs to have transition lots



May allow for additional lots

Keeps intent but allows flexibility for smaller sizes

Keeps intent and recognizes challenge of some in-fill lots

Add flexibility while keeping majority of existing regulations

Less opportunity for additional lots