



October 3, 2019

VIA EMAIL ONLY

Shoreline Planning Commission
17500 Midvale Ave N
Shoreline, WA 98133

RE: Townhouse design standards

Dear Members of the Planning Commission,

I submit this letter in my capacity as a housing developer/ builder doing business in Shoreline, and also a lifelong resident of the community that we all value. For many years, my family's real estate investment & development company has been actively developing for-sale housing in Seattle and the surrounding suburbs, including Shoreline. Our specific focus has been, and continues to be, higher density residential infill product such as town homes, row houses and small multi-family developments. In 2016, we developed the first townhome project within the 185th rezone, and continue to invest in Shoreline to this day. We've been directly involved in more than a dozen infill townhome projects totaling nearly 60 units, and have evaluated well over 100 similar projects. All this to say, we have a genuine interest in Shoreline and significant first-hand experience navigating the Development Code.

We appreciate the efforts of City staff who have sought input on the proposed Townhouse Design Standards from us (the development community) as well as other stakeholders. The stated goals of the project are: 1) to "address gaps in the Development Code," and 2) achieve "townhouse developments with a higher quality of design"- both goals that seem to benefit Shoreline. In our view, many of the proposals could provide more housing choice and may result in "a higher quality of design." However, this is clearly subjective and a few of the well-intentioned code proposals which you are considering, have consequences that we predict will result in an effective development moratorium on the majority of MUR 35 and MUR 45 zoned parcels in Shoreline. Most notably, is the regulation proposal related to 40% of the units placed along the "street wall."

SMC 20.50.160(C) Site Configuration-

We understand the intent to eliminate "inline row houses" on mid-block lots which have little to no connection with the street frontage. The proposed 40% of units required to be placed within the "street wall" will almost certainly make development infeasible for any mid-block lot that is less than 70 feet wide. A typical 60' wide by 120' deep MUR 45 lot has a required minimum density of 3 units. Considering the 40% rule alongside the minimum density requirement, simple math tells us that at least

two of those units must be within the “street wall.” Using that same lot as an example, reduce the buildable width by 25’ (20’ for the required driveway and 5’ for the building setback). The remaining 35’ of buildable width results in two units with maximum interior width dimensions of 16.5’ each. Market conditions dictate that these skinny units are infeasible. If it was feasible, this would actually decrease housing choice opportunities and site design options. Ask yourself, which is “higher quality design,” two skinny units up front and connected to the street, alongside a 20’ impervious driveway that serves a single unit in back, OR one larger unit up front with yard space, landscaping and street connection alongside a 20’ impervious driveway serving two units in the back?

SMC 20.50.490 Landscaping along interior lot line-

(This section highlighted to illustrate the compounding effect) This proposal would require landscaping that is 5’ wide (the same width as the side setback) as a prescriptive requirement. Considering that the intent of the Code is to separate pedestrian walkways from vehicle access drives, this regulation disincentivizes developments to meet that intent. Here’s why: when considered alongside SMC 20.50.150, the result is an effective 9’ setback (5’ landscape plus 4’ walkway) between a building and a side lot line. Another significant dimensional constraint on design options when considering typical lot widths in Shoreline.

Earlier, I mentioned the cumulative effect of code and the resulting physical constraints. The examples above did not consider other applicable codes such as retained trees, entry canopies and building modulation to name just a few. These regulations compound to have an absolute impact on available physical space, often contradict the intent of other sections, and will render much of the potential development in Shoreline infeasible.

I respectfully request that you review the specific concerns described above and really take the time to consider the cumulative effect of these proposed regulations within the context of the entire Development Code. The Commission has acknowledged that this proposal will likely slow development and it was even suggested that the City of Shoreline “...struggle along {with the 40% requirement} until they can come up with a better plan...” This approach is impetuous and I strongly urge you to draw on the available resources, identify additional options and do just that, come up with a better plan to address the concern

I appreciate your consideration as these important decisions before you will directly impact the likelihood of Shoreline realizing its Vision 2029 Framework Goal #12 supporting housing choice, affordability, diversity and the quality of life we value in our community.

Thank you,



Erik Ekstrom, Managing Member
Beachworks, LLC

Cc: Nathan Daum, City of Shoreline Economic Development Program Manager