City of Renton

Department of Community and Economic Development
Planning Division

ADMINISTRATIVE POLICY/CODE INTERPRETATION

ADMINISTRATIVE POLICY/CODE INTERPRETATION #: CI-73 - REVISED

MUNICIPAL CODE SECTIONS: 4-2-110.A, 4-2-110.B, 4-2-110.D, 4-2-115, 4-11-020, and 4-11-230

REFERENCE:

SUBJECT: Residential Building Height (RC thru RMF)

BACKGROUND:

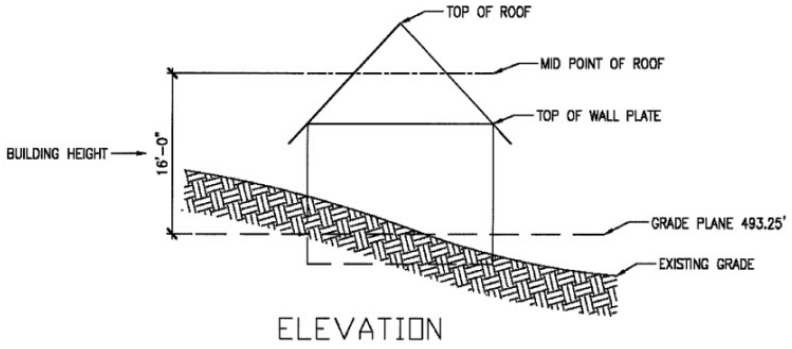
Erratum Statement: CI-73 implemented changes to the method of height measurement for structures in the RC through RMF zones. This erratum statement affects the two-story limitation for R-14 zoned properties by increasing it to three. Docket #116 advocates for increased height and story limits for select zones, including the RMF zone. The R-14 zone is transitional between the R-10 and RMF, and therefore R-14 standards are intended to offer a compromise between the restrictions of the R-10 and the allowances of the RMF zone. By limiting wall plate height to 24' yet allowing three stories, the R-14 zone would provide an appropriate transition between the R-10 and RMF zones with respect to building height.

By definition, the current method to determine a building's height is to measure the average height of the highest roof surface from the grade plane (i.e., average grade). The maximum height allowed in the RC through R-14 zones is 30 feet (35' in the RMF). The implementation of a "maximum height" (RMC 4-2-110.A) as applied to roofed buildings is inconsistent and contradictory with the intent and purpose statements of Title IV related to residential design (RMC 4-2-115). Further, regulating the height of non-roofed structures is unenforceable by Title IV (except for Building Code). The ambiguity and contradictory aspects of the code exist for two reasons:

1. Height is measured to the midpoint of a roof; and
2. Flat roofs are able to be as tall as buildings with pitched roofs, which increases the building's massing.

Issues stemming from existing code and consequent construction of new single family houses include inappropriate massing relative to the existing and desired character of neighborhoods, the loss of views from existing residences, and the loss of direct sunlight on properties adjoining those with structures designed with tall wall elements and shallow or flat roofs.

Shown below is a graphic included in the definition of "building height:"



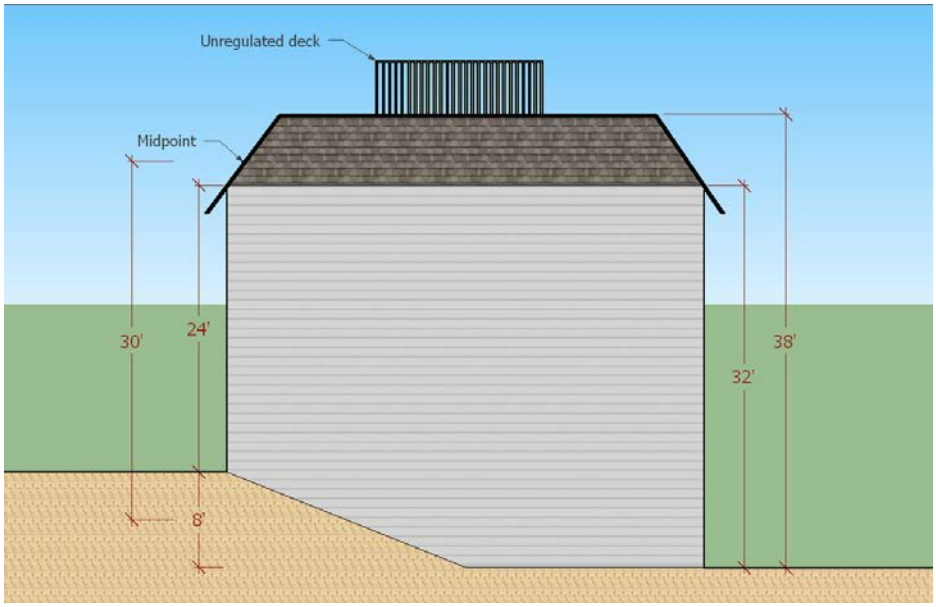
DETERMINATION OF BUILDING HEIGHT

The definition contradicts itself because it states that the measurement is to "the average height of the highest roof surface" (i.e., midpoint between the eave and apex), but the graphic implies the average would be the distance between the top of the wall plate and the apex of the roof. Besides being contradictory, the definition omits any portion of a building that lies below the grade plane and any portion that exists above the midpoint of the roof. The definition provides a means to measure "building height" if there is a roof surface, but any structure without a roof surface (e.g., decks, railings, etc.) is effectively unregulated.

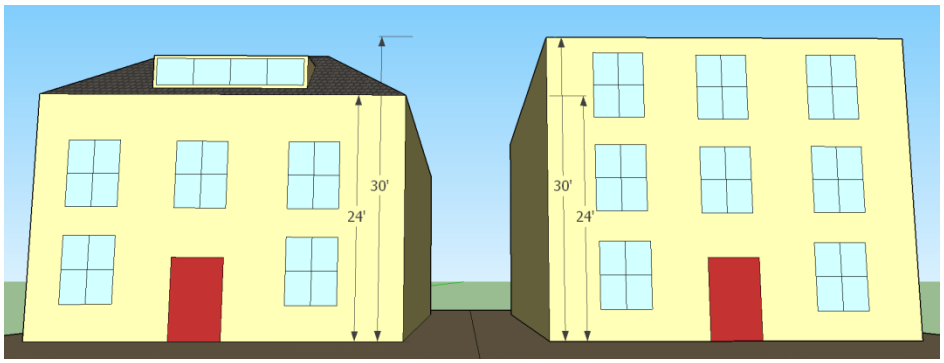
Although the "maximum height" in all zones from RC to R-14 is 30 feet (35' in the RMF zone), because building height is measured from the grade plane to the roof midpoint, a building that is only 30 feet tall (per RMC) can have a facade over 30 feet tall and an effective height close to 40 feet. The same structure that is effectively taller than 30 feet can have non-roofed additions (e.g., decks) that extend even higher.

Because the definition does not address non-roofed structures and does not acknowledge portions of roofed structures above the roof midpoint, an accurate measurement of building height is undeterminable per Title IV, and therefore regulating the height of roofed and non-roofed structures with the application of a "maximum height" (RMC 4-2-110.A) is unclear.

Below is a graphic that illustrates how the ambiguity of the definition allows buildings to be effectively taller than the maximum height for all structures.



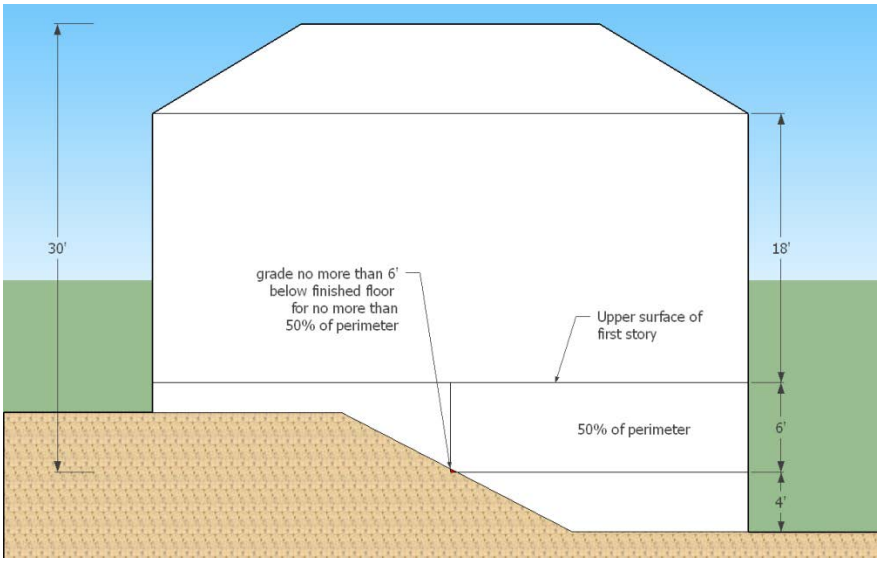
Furthermore, the intent behind the definition of “building height” and the application of a 30-foot height limit are reliant upon having a pitched roof; a 30-foot height limit provides enough height for two stories (~24’) with additional height for the roof. The design guidelines for residential development (RMC 4-2-115) require a 6:12 pitched roof; however, alternative designs can be approved by a Modification Permit. When a lesser pitch is approved the maximum height of 30 feet remains unchanged even though shallow or flat roofs allow facades to be taller, thereby increasing the “mass” of the building (see illustration below).



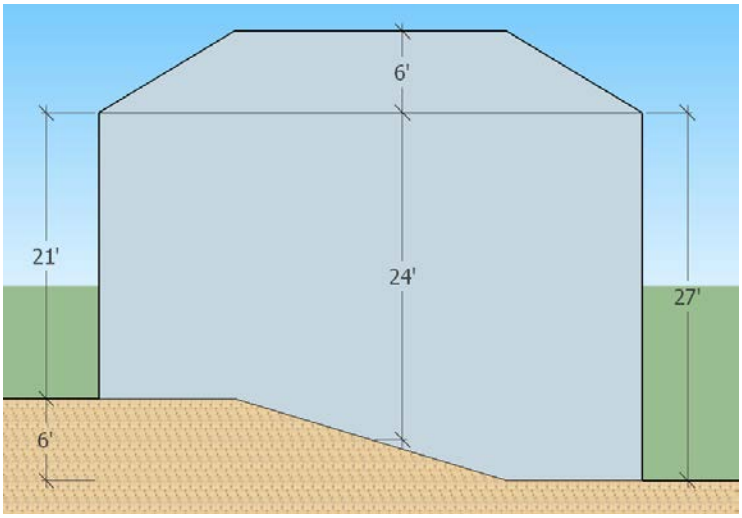
Inappropriate massing alters the scale of buildings and can diminish the character of residential communities, which are intended to be oriented towards people. Existing regulations do not provide a means to limit façade height for flat/shallow roofs in order to prevent inappropriate massing; therefore, the current method of regulating height contradicts the intent and purpose of RMC 4-2-115, Residential Design and Open Space Standards. “Roof forms and profiles are an important component in the architectural character of homes **and contribute to the massing, scale, and proportion of the home**” (purpose statement for roof design guidelines, RMC 4-2-115.E.3). “Residential communities are intended for people and homes that have **appropriate scale and bulk** [and] contribute to the sense of **orientation to people**” (purpose statement for scale, bulk, and character guidelines, RMC 4-2-115.E.3).

JUSTIFICATION: Because current code fails to regulate the effective height of all structures, and measuring to the midpoint of the roof can result in buildings that are taller and/or more massive than intended by Title IV, building height is proposed to be regulated by the number stories and the wall plate height.

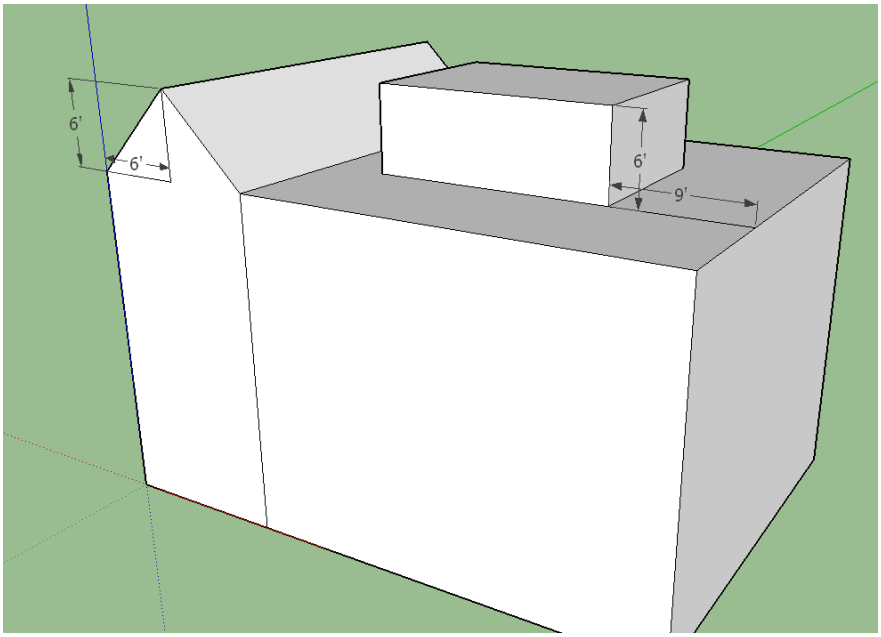
Because the application of a 30 feet “maximum” building height combined with the requirement to pitch a roof at 6:12 or greater is intended to provide enough height for two stories, a limit on the number of stories within residential buildings is proposed. Limiting residential buildings to two stories will enable some sloped lots to build into the earth enough so as to qualify the first floor as a non-story (e.g., a daylight basement or “tucked” garage) per the definition of “story” in RMC 4-11-190, Definitions S. The grade plane would need to cover enough of the façade so that the upper surface of the first story is no more than six feet above grade for no more than 50% of the perimeter (see illustration below).



Maximum wall plate heights will be applied to residential structures in the RC through RMF zones. In response to apparent market demand for roofs pitched at 4:12, roof guidelines of RMC 4-2-115.E are proposed to be reduced from a minimum roof pitch of 6:12 to 4:12. Roofs with at least a 4:12 pitch will be allowed to project up to six vertical feet from the maximum wall plate height. This will result in relatively equal massing between flat-roofed houses and pitched-roofed houses (assuming all other variables are equal). For example, the building below has a wall plate height of 24 feet, with a pitched roof that projects six feet.



Because a roof could be designed with a 12:12 pitch (a 45o angle), an exception to the maximum height for shallow-roofed buildings (less than 4:12 pitch) is proposed that would require additions to be far enough stepped back from the facade to be no less injurious to adjoining properties than a 12:12 pitched roof. A step back ratio of one-and-a-half (1.5) horizontal feet from each facade for each one (1) vertical foot above the maximum wall plate height results in an 8:12 pitch, as measured from the wall plate to the encroachment, and therefore blocks natural light no more than a 12:12 pitched roof (see graphic below).



Because shed-style roofs require wall plate heights of varying height, compliance with the maximum wall plate height standard will be satisfied if the average of wall plate heights does not exceed the maximum wall plate height.

DECISION: In the RC through RMF zones, residential and accessory structures shall be subject to the maximum wall plate height standard, defined as the vertical distance from the grade plane to the highest wall plate. Wall plates shall not exceed 24' in height (except structures in the RMF zone, which shall be granted 30' of wall plate height based on the current building height limitation of 35'). Roofs pitched at a 4:12 slope or greater may project an additional six vertical feet from the maximum wall plate height. Common rooftop features, such as chimneys, may extend an additional four feet from the roof surface.

Non-exempt vertical projections (e.g., decks) from a roof pitched less than 4:12 shall not extend above the maximum wall plate height unless the projection is stepped back one-and-a-half (1.5) horizontal feet from each façade for each one (1) vertical foot above the maximum wall plate height.

Measurement of the wall plate height for shed-style roofs shall be taken from the grade plane to the average of wall plate heights associated with the shed roof.

Residential buildings in the RC through R-10 zones shall be limited to two stories, while the R-14 and RMF zones shall be limited to three stories.

ADMINISTRATOR APPROVAL: _____
C. E. "Chip" Vincent

EFFECTIVE DATE: September 16, 2015

APPEAL PROCESS: To appeal this determination, a written appeal--accompanied by the required filing fee--must be filed with the City's Hearing Examiner (1055 South Grady Way, Renton, WA 98057, 425-430-6515) no more than 14 days from the date of this decision. Your submittal should explain the basis for the appeal. Section 4-8-110 of the Renton Municipal Code provides further information on the appeal process.

CODE AMENDMENTS NEEDED TO IMPLEMENT DETERMINATIONS:

4-2-110A DEVELOPMENT STANDARDS FOR RESIDENTIAL ZONING DESIGNATIONS (PRIMARY AND ATTACHED ACCESSORY STRUCTURES)

	RC	R-1	R-4	R-6	R-8	R-10	R-14	RMF
Maximum Number of Stories	2	2	2	2	2	2	3	3
Maximum Wall Plate Height[8, 9, 18, 19]	~~30 ft.~~ 24 ft.						~~Residential: 30 ft. Commercial: 20 ft.~~	~~35~~ 30 ft.[20]

4-2-110B DEVELOPMENT STANDARDS FOR RESIDENTIAL DEVELOPMENT (DETACHED ACCESSORY BUILDINGS)

MAXIMUM BUILDING HEIGHT	
RC	Accessory building – 15 ft.
R-1, R-4, R-6, and R-8	Accessory building – 15 ft. Accessory dwelling units and Animal husbandry or agricultural related structures – subject to the maximum wall plate height of RMC 4-2-110.A, and any associated conditions. ~~30 ft., except that the accessory unit structure (dwelling space, garage space, etc.) shall not be taller than the primary dwelling.~~

	~~Animal husbandry or agricultural related structures – 30 ft.~~
R-10 and R-14	Accessory building – 15 ft. Accessory dwelling unit and Animal husbandry or agricultural related structures – subject to the maximum wall plate height of RMC 4-2-110.A, and any associated conditions.~~30 ft.~~
RMF	25 ft.
Maximum Height for Public Facilities – see RMC 4-2-110D9.	
Maximum Height for Wireless Communication Facilities (Including Amateur Radio Antennas)	
RC, R-1, R-4, R-6, R-8, R-10, R-14, and RMF	See RMC 4-4-140, Wireless Communication Facilities. Freestanding vertical monopole amateur radio antennas are allowed a maximum height of 45 ft. without a Conditional Use Permit. Taller structures will have maximum height determined pursuant to RMC 4-9-030, Conditional Use Permits.

4-2-110D CONDITIONS ASSOCIATED WITH DEVELOPMENT STANDARDS TABLE FOR RESIDENTIAL ZONING DESIGNATIONS

18. Roofs with a pitch equal to or greater than 4:12 may project an additional six (6) vertical feet from the maximum wall plate height; common rooftop features, such as chimneys, may project an additional four (4) vertical feet from the roof surface. Non-exempt vertical projections (e.g., decks, railings, etc.) shall not extend above

the maximum wall plate height unless the projection is stepped back one-and-a-half (1.5) horizontal feet from each façade for each one (1) vertical foot above the maximum wall plate height. ~~Reserved.~~

19. Wall plates supporting a roof with only one (1) sloping plane (e.g., shed roof) may exceed the stated maximum if the average of wall plate heights is equal or less than the maximum wall plate height allowed. ~~Reserved.~~

20. An additional ten feet (10') height for a residential dwelling structure may be obtained through the provision of additional amenities such as ~~pitched roofs,~~ additional recreation facilities, underground parking, and additional landscaped open space areas; as determined through the site development plan review process and depending on the compatibility of the proposed buildings with adjacent or abutting existing residential development. In no case shall the maximum wall plate height of a residential structure exceed ~~forty~~ thirty-five feet (~~45'~~35').

4-2-115 RESIDENTIAL DESIGN AND OPEN SPACE STANDARDS:

E. REQUIREMENTS:

3. Residential Design:

ROOFS: Roof forms and profiles are an important component in the architectural character of homes and contribute to the massing, scale, and proportion of the home. Roofs also provide opportunity to create variety, especially for homes of the same model.	
Guidelines: Roofs shall represent a variety of forms and profiles that add character and relief to the landscape of the neighborhood. The use of bright colors, as well as roofing that is made of material like gravel and/or a reflective material, is discouraged.	
Standards:	
RC and R-1	n/a
R-4, R-6, and	One of the following is required for all development:

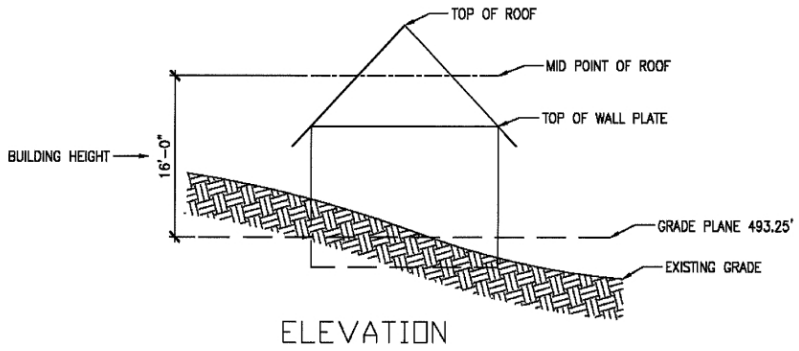
R-8	1. Hip or gabled with at least a ~~six~~ four to twelve (~~6~~4:12) pitch for the prominent form of the roof (dormers, etc., may have lesser pitch), or 2. Shed roof. Additionally, for subdivisions greater than nine (9) lots: A variety of roof forms appropriate to the style of the home shall be used.
R-10 and R-14	Both of the following are required: 1. Primary roof pitch shall be a minimum ~~six~~ four to twelve (~~6~~4:12). If a gable roof is used, exit access from a third floor must face a public right-of-way for emergency access, and 2. A variety of roofing colors shall be used within the development and all roof material shall be fire retardant.

RMC 4-11-020 DEFINITIONS B

BUILDING HEIGHT: The measurement of building height depends on the applicable zone, as follows:

1. **Within the RC, R-1, R-4, R-6, R-8, R-10, R-14, and RMF zones: The vertical distance from grade plane to the highest wall plate combined with any portion of the structure that extends above the wall plate (e.g., roof, deck, etc.), excluding chimneys, ventilation stacks, and similar elements as determined by the Administrator.**

2. All other zones: The vertical distance from grade plane to the average height of the highest roof surface.



DETERMINATION OF BUILDING HEIGHT

RMC 4-11-230 DEFINITIONS W

WALL PLATE HEIGHT, MAXIMUM: The vertical distance from the grade plane to the highest wall plate.

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