



**Department of Community and Economic Development  
Planning Division  
ADMINISTRATIVE POLICY/CODE INTERPRETATION**

**ADMINISTRATIVE  
POLICY/CODE  
INTERPRETATION #:** CI-91

**MUNICIPAL  
CODE SECTIONS:** 4-11-010 Definitions A; 4-11-190 Definitions S; 4-2-110.A Development Standards for Residential Zoning Designations (Primary and Attached Accessory Structures); RMC 4-2-110.B, Development Standards for Residential Zoning Development (Detached Accessory Structures); and 4-2-110.D Conditions Associated with Development Standards Table for Residential Zoning Designations.

**SUBJECT:** Modifications of Residential Building Height Standards

**BACKGROUND:** Ord. 5790 instituted new standards for residential building height, specifically, limiting the number of stories, limiting the maximum height of topmost wall plates, and establishing standards for vertical projections from the topmost wall plates.

Ord. 5790 utilized the existing definition of "story" to implement the new restriction of the number of allowed stories. That definition qualifies the topmost story as "that portion of a building included between the upper surface of the topmost floor and the ceiling or roof above." The definition would qualify any floor commonly regarded as an attic to be a story. The intent of limiting the number of stories was to ensure that if a lot has a grade difference the building may be designed so that the first floor is partially subterranean, which partially obscures building mass, and thereby qualified as a basement.

The R-14 Zone was determined to be a suitable "transitional zone" between the greater maximum wall plate height (32') and number of stories (3) allowed in the RMF Zone, and the R-6, R-8, and R-10 zones where maximum wall plate height is limited to 24' and the number of stories is limited to two. The R-14 Zone was afforded only 24' of maximum wall plate height, but allowing three stories was intended to not require a partially subterranean basement where a grade difference is present.

Footnote 18.b of RMC 4-2-110.D states "nonexempt vertical projections (e.g., roofs pitched less than 4:12, decks, railings, etc.) may extend up to six (6) vertical feet above the maximum wall plate height if the projection is stepped back one-and-a-half (1.5) horizontal feet from each minimum building setback line for each one vertical foot above the maximum wall plate height." The intent of this provision was to not obscure natural light that would otherwise exist if the roof was sloped with at least a 4:12 pitch.

Footnote 19 of RMC 4-2-110.D states "Shed Roofs: Wall plates supporting a primary roof surface that has only one sloping plane (e.g., shed roof) may exceed the stated maximum if the average of wall plate heights is equal to or less than the maximum wall plate height allowed." This provision is not currently applied to RMC 4-2-110.B, Development Standards for Residential Zoning Development (Detached Accessory Structures), which is in part to provide standards for sheds.

**JUSTIFICATION:**

Because the definition of "story" unequivocally qualifies what is commonly regarded as an attic (whether habitable or inhabitable) to be a story, and this was not the intent of limiting the number of stories, a definition of "attic" should be established within Title IV. Renton has adopted the 2012 International Residential Code, which defines a habitable attic as being at least 70 square feet in area and 50% of which having a floor to ceiling height of at least seven feet. Because the restriction of the number of stories serves to minimize the apparent mass of a residential structure, the new definition of "attic" must be somewhat restrictive, otherwise there would be no cause to make the first floor subterranean. Therefore, an attic is proposed to be defined as "a finished or unfinished area, not considered a story, located between the upper surface of the topmost floor and the ceiling or roof above, and having a ceiling height of less than seven feet (7') for an area that constitutes at least fifty percent (50%) of the building footprint."

The R-14 Zone remains an appropriate transitional zone for height, but there may be locations where an increase of the maximum wall plate height may be appropriate to further this intent. Allowing an increase of maximum wall plate height up to 32' through an Administrative Conditional Use Permit would provide greater flexibility and help to realize a better height transition between zones.

Because a required step-back for features located above the maximum wall plate height was intended to incentivise pitched roofs and not limit natural light on abutting properties, railings of rooftop decks should not be required to be stepped-back if they are at least 50% transparent.

Footnote 19 of RMC 4-2-110.D should apply to RMC 4-2-110.B, Development Standards for Residential Zoning Development (Detached Accessory Structures) because the exception is intended to provide roofing structures commonly found on sheds.

**DECISION:**

A definition of "attic" will be added to Title IV RMC, and referenced within the definition of "story." In the R-14 Zone, a provision to increase the maximum wall plate height up to 32' through a Administrative CUP will be added to RMC 4-2-110.A. Footnote 18.b of RMC 4-2-110.D will be

amended to exempt deck railings from the step-back requirement if the railings are at least 50% transparent. Footnote 19 of RMC 4-2-110.D will apply to RMC 4-2-110.B, Development Standards for Residential Zoning Development (Detached Accessory Structures).

**ADMINISTRATOR APPROVAL:**

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C. E. "Chip" Vincent

**EFFECTIVE DATE:**

August 23, 2016

**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:**

4-11-010 DEFINITIONS A:

**ATTIC:** A finished or unfinished area, not considered a story, located between the upper surface of the topmost floor and the ceiling or roof above, and having a ceiling height of less than seven feet (7') for an area that constitutes at least fifty percent (50%) of the building footprint.

**STORY:** That portion of a building included between the upper surface of any floor and the upper surface of the floor above, except that the topmost story shall be that portion of a building included between the upper surface of the topmost floor and the ceiling or roof above, unless such area meets the definition of an attic. If the finished floor level directly above a usable or unused under-floor space is more than six feet (6') above grade for more than fifty percent (50%) of the total perimeter or is more than twelve feet (12') above grade at any point, such usable or unused under-floor space shall be considered as a story.

**NOTE:** The graphic distinguishing a basement from a story is not shown, but will remain below the definition of "story."

**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
<b>Maximum Wall Plate Height</b> <sup>8, 9,</sup> <sub>12, 18, 19</sub>	32 ft.			24 ft.			24 ft., increase up to 32 ft. possible subject to administrative conditional use permit	32 ft.

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

MAXIMUM WALL PLATE HEIGHT <sup>18, 19</sup>	
RC	Accessory building – 12 ft.
R-1, R-4, R-6, and R-8	Accessory building – 12 ft. Accessory dwelling units and animal husbandry or agricultural related structures are subject to the maximum wall plate height of subsection A of this Section, and associated conditions. Additionally, the structure shall not be taller than the primary dwelling.
R-10 and R-14	Accessory building – 12 ft. Accessory dwelling unit and agricultural related structures are subject to the maximum wall plate height of subsection A of this Section, and associated conditions, except that the structure shall not be taller than the primary dwelling.
RMF	25 ft. <sup>20</sup> , except that the structure shall not be taller than the primary building(s).

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

**18. Vertical Projections from Wall Plates:**

- a. 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. If the height of wall plates on a building are less than the stated maximum the roof may project higher to account for the difference, yet the combined height of both features shall not exceed the combined maximums (e.g., if the maximum wall plate height of a zone is twenty-four feet (24') and the wall plates of a structure are no taller than twenty feet (20'), the roof may project up to ten feet (10') instead of six feet (6')). Common rooftop features, such as chimneys, may project an additional four (4) vertical feet from a roof surface.

b. ~~Nonexempt vertical projections (e.g.,~~ The topmost surface of roofs pitched less than 4:12, and rooftop decks shall be below the maximum wall plate height, railings, etc.) may extend up to six (6) vertical feet above the maximum wall plate height if the projection is unless such surfaces are stepped back one-and-a-half (1.5) horizontal feet from each minimum building setback line for each one vertical foot above the maximum wall plate height, in which case they may extend up to six (6) vertical feet above the maximum wall plate height. Railings located above the maximum wall plate height and not stepped back shall be at least fifty percent (50%) transparent.

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