



AGENDA

PLANNING COMMISSION

Virtual Meeting

Attend Live Meeting Here: <https://www.cityofpa.us/984/Live-Virtual-Meetings>

September 14, 2022

6:00 p.m.

I. CALL TO ORDER

II. ROLL CALL

III. PUBLIC COMMENT

IV. APPROVAL OF MINUTES

Minutes of the August 10, 2022 Regular Meeting

V. DISCUSSION

1. Proposed changes to Port Angeles Municipal Code Title 17

Presentation of staff memorandum providing itemized feedback and recommendations in response to the Commission's proposal to proceed with implementation of amendments to Title 17 of the Port Angeles Municipal Code aimed at advancing housing solutions.

VI. STAFF UPDATES

1. Overview of Planning Commission Recommendations presented at September 6th City Council Meeting
2. September 6th City Council Motion

VII. REPORTS OF COMMISSION MEMBERS

VIII. ADJOURNMENT

MINUTES

PLANNING COMMISSION

Virtual Meeting
Port Angeles, Washington 98362
August 10, 2022 6:00 p.m.
REGULAR MEETING

CALL TO ORDER

Chair Stanley opened the regular meeting at 6:02 P.M.

ROLL CALL

Commissioners Present: Richie Ahuja, Tammy Dziadek, Stephen Luxton, Andrew Schwab (Vice-Chair), Marolee Smith, Benjamin Stanley (Chair), Colin Young

Commissioners Absent: None

City Staff Present: Ben Braudrick (*Senior Planner*)
Norman Gollub (*Interim Director of Community and Economic Development*)
Zach Trevino (*Assistant Planner*)

Public Present: Jodi Fairchild

PUBLIC COMMENT

Chair Stanley opened the meeting to public comment.

No member of the public provided comment.

Chair Stanley closed the meeting to public comment.

APPROVAL OF MINUTES

Vice Chair Schwab moved to approve the minutes from the July 27, 2022 regular meeting of the Planning Commission. **Commissioner Smith** seconded. The motion passed 6-0-1, with Commissioner Ahuja abstaining.

ACTION ITEM

1. **Façade Grant No. 22-02**

Skincare Suites and Wellness Spa, 106-108 East 1st Street

Planner Braudrick displayed a slide presentation and introduced the applicant's request. He explained the location of the building, noting that an interior and exterior remodel of the building is already underway. The exterior remodel will integrate the two units into a single storefront with cohesive architectural elements. While keeping with the historic nature of the building, the applicant is installing a new entry door, rehabilitating the transom windows, and restoring the entire façade of the building. The applicant is facing a projected cost of \$76,800 for the exterior façade

rehabilitation, so is requesting a façade grant of \$20,000 from the City of Port Angeles to cover a portion of the total cost. He concluded the overview by noting that staff recommends the approval of funding for the requested grant, based on the findings and conclusions and subject to the conditions contained in the staff report.

Chair Stanley asked whether \$20,000 has always been the upper limit for façade grant amounts. Planner Braudrick responded that the site is located in an improvement area between Race Street and Laurel Street, so there is no maximum amount for this area. Part of the reason for this is due to the anticipated restoration of the Lincoln Theater.

Chair Stanley opened the item to Commissioner discussion.

Commissioner Smith expressed support for the proposal, noting that this building has experienced interior alterations that did not comply with building code and needs improvement. She added that the request is an excellent way to spend the City's money.

Commissioner Dziadek asked for clarification about what type of spa the proposed use is. **Jodi Fairchild**, project applicant, explained that the business is moving from its current location, and provided an overview of services offered to customers by the business, which has been operating for 15 years.

Chair Stanley asked staff whether certain façade features, such as the upper windows, can be considered historic and, if so, whether they are being preserved. The applicant responded that they are installing more energy efficient windows that will not change the visual character of the building. Chair Stanley responded that such an improvement makes sense, especially considering the City's ongoing focus on climate resiliency planning.

Commissioner Smith noted that this building existed prior to the street being raised in the 20th century, so possesses a full lower level below current grade. She noted the proposed improvements will restore the building closer to its original configuration.

Planner Braudrick added that the applicant is trying to use the same architectural style and typology that have historically been present, which is appreciated.

Chair Stanley noted that no part of Port Angeles is more deserving of façade grants than the block where this building is located. He expressed his full support for the proposal.

Commissioner Young motioned to approve the funding for Façade Improvement Grant No. 22-02, citing the seven findings, three conclusions, and seven conditions contained in the staff report. Commissioner Dziadek seconded. The motion passed unanimously (7-0).

DISCUSSION ITEM

1. Discussion: Review of Process to Amend Port Angeles Municipal Code Title 17

Continued discussion of the Commission's options for how to proceed with pursuing implementation of proposed changes to Title 17 of the Port Angeles Municipal Code (PAMC).

Commissioner Stanley introduced the continued discussion about Commissioner Luxton's recommendations for changing the Zoning Code to encourage more housing.

Planner Braudrick explained that staff has been working for two weeks to compile additional information as requested by the Commission. Chair Stanley noted, in response to a request for clarification by Commissioner Luxton, that staff discovered that the Commission does have the ability to change the PAMC quicker than previously anticipated.

Planner Braudrick presented background to staff's process and a recommended timeline for the proposed Title 17 Code Amendments requested by the Commission. He noted that the shared goal

of staff and the Commission is to acquire as many tools in the City's "toolbox" as possible to facilitate housing construction. He provided an overview of Revised Code of Washington (RCW) 36.70A.600, which contains provisions that prevent certain actions proposed through the Building Residential Capacity (BRC) legislation from being legally challenged until April 1, 2023. In order to aid the Commission in understanding recent trends in housing construction in the City, he displayed a table of dwelling unit construction by housing type that has occurred since 2017. One notable aspect of the trend is the increase in accessory dwelling unit (ADU) and duplex production after the requirement that a conditional use permit be obtained was eliminated, which caused the uses to be allowed outright. He recommended that the Commissioners review the City's Housing Action Plan adopted in 2019 to understand the unmet need for certain types of housing that had been identified in 2017. One trend identified in the plan was the projected reduction in demand for single-household dwellings, and the increase in the number of single individuals and smaller households in the City of Port Angeles.

After providing relevant background information, **Planner Braudrick** presented staff's recommended procedure for adopting an interim ordinance by March 2023, which would sunset in July 2025 during the Comprehensive Plan update process. The next step in the recommended process timeline is for staff to prepare a general memorandum addressed to City Council notifying the Councilmembers of the proposed changes to PAMC that have been proposed by the Commission. The memorandum would provide the recommended process timeline so the Council can understand what their workload will be in the future.

Chair Stanley asked for clarification on whether the process would result in a single ordinance or multiple ordinances enacted at once. **Planner Braudrick** responded that a single ordinance would include every section of PAMC that is proposed to be changed. He noted that staff does have certain changes that will be incorporated into this amendment effort in order to aid the initiative to build additional residential capacity. Some existing design requirements may be cost prohibitive and onerous, so will be reevaluated and potentially simplified.

Commissioner Smith asked whether the proposal to allow the use of RVs as temporary housing will be included in the process staff described. **Chair Stanley** responded that he would like to see that topic incorporated into the conversation moving forward.

Commissioner Young asked whether the proposed timeline can be expedited, as the changes will not produce an immediate effect and the housing unit shortage, which he perceives as an emergency, will take years to remedy. **Planner Braudrick** noted that the process is already expedited, and that the Zoning Code is only one component of any solution to housing capacity, so staff needs adequate time to consider the whole situation with accurate facts. **Commissioner Luxton** responded that facts are unnecessary, as the problem is apparent, with a solution overdue. He added that the most important piece of the puzzle is enabling fourplexes in low-density residential zones, which would open up much of the City to eligibility for the multi-family tax exemption without increasing density. **Planner Braudrick** noted that he is unaware of any fourplex recently proposed in a zone where such development is already allowed, so allowing it in more places may not solve the housing shortage problem. **Commissioner Luxton** responded that there is little available land in the RMD and RHD zones, and allowing such development in the R7 zone would significantly increase the amount of available development land.

Chair Stanley stated that planning is perhaps the most bureaucratic field that exists, so he understands staff's desire to proceed with caution, but noted that an emergency necessitates taking additional risk. He suggested that a comprehensive approach should be avoided in order to expedite change, which could be reassessed later, and reminded the Commission that they have the power to send proposed PAMC changes directly to the City Council. Public comment could occur after the ordinance is adopted. Further Commission discussion of the merits of this approach in comparison to a slower process ensued.

Commissioner Smith motioned to recommend that the City Council and City staff proceed with a process to adopt an ordinance enabling the emergency use of RVs as residential dwelling units when parked on private property in the City, as long as they are connected to water, sewer, and electricity utilities. **Vice Chair Schwab** seconded. Discussion followed, clarifying the intent and refining the language to yield an amended motion that was restated before a vote occurred. During this discussion, anecdotes were provided to demonstrate that illegal occupancy of RVs with inadequate utility service is already occurring in the City.

Chair Stanley proposed an official amendment to **Commissioner Smith's** original motion to incorporate a reference to the August 22, 2018 agenda packet as articulated by **Vice Chair Schwab**. Before a vote occurred, the Commission discussed the code enforcement practices of the City in response to violations of the Zoning Code.

After lengthy discussion involving all Commissioners, the Commission agreed upon the following final motion: **In light of the perceived housing emergency affecting the City of Port Angeles and the recently improved City staff capacity to pursue enforcement of occupancy violations, the Planning Commission motions for City Council and City Staff to proceed with review and consideration of the Temporary Dwelling Unit Ordinance as discussed at the August 22, 2018 Planning Commission meeting, then proceed with the necessary process to adopt a similar ordinance to allow for the use of recreational vehicles as temporary dwelling units on private property in the City, provided they are legally connected to water, sewer, and electrical utilities.** Chair Stanley called for a vote on the amended motion. Motion passed 5-2 with Commissioners Luxton and Young voting nay.

After the vote, the Commission returned to its discussion of the proposed changes to Title 17 through amendment of the PAMC.

Commissioner Young clarified that he is not seeking to reduce the level of staff work that occurs as part of the proposed process, but does want to shorten the public comment period in order to present the item to City Council sooner. He explained that shortening the timeline would not cost the City more money, but would require reprioritization of resources. **Planner Braudrick** responded by expressing the importance of the comment period, which could include the SEPA public comment period and the public comment period for the proposed ordinance running in conjunction.

Chair Stanley added that a proper process is a significant part of what provides legitimacy to final decisions made by elected officials. He asked **Commissioner Luxton** if he had interest in drafting a proposed process and timeline for Planning Commission review. **Commissioner Luxton** responded by stating that this meeting would be his last Planning Commission meeting, as he would be resigning from the Commission.

Commissioner Stanley asked whether, if fourplexes were enabled in the R7 zone immediately, **Commissioner Luxton**, acting as a developer, would be ready to start on a development project. **Commissioner Luxton** responded that it would take years to actually develop, as there are other significant barriers in addition to zoning regulations, such as mortgage rates.

Chair Stanley called for "radical" discussion of how the Commission can address the barriers to housing production. Further discussion of this issue and potential solutions ensued among the Commission. **Planner Braudrick** noted that the next regular Planning Commission meeting will be cancelled, so the discussion could continue at the next meeting date after that recess. In the interest of maintaining open communication between staff, the Commission, and City Council, staff will prepare a memorandum for the City Council, and noted that the Council has the ability to review Planning Commission meeting minutes.

Chair Stanley motioned to continue the discussion of the process for implementing the proposed changes to Title 17 of the Port Angeles Municipal Code at the next regular meeting,

to encourage Planning Commissioners to research and bring ideas about potential housing solutions to the next meeting for Commission discussion, and for staff to proceed with the recommended process as outlined in the staff presentation, including the preparation of a memorandum to City Council. Commissioner Young seconded. Brief discussion occurred before a vote. The motion passed unanimously (7-0).

STAFF UPDATES

Planner Braudrick provided updates to the Commission, as follows:

- The conversation that has occurred, incorporating every Commissioner's perspective on the housing issues facing the City, has been productive and appreciated by staff.
- A short educational course on local planning will likely be scheduled for the Commission in September.

Interim Director Gollub provided an update to the Commission, as follows:

- The City has one Code Enforcement officer and is currently training a second officer, who should be prepared to begin handling enforcement duties within approximately six weeks.

Planner Trevino provided an update to the Commission, as follows:

- The Temporary Building Permit Fee Waiver program documents, including application form, are now available on the City's website for public use.
- A date needs to be determined for the annual training provided by the City's Legal Staff regarding the Public Records Act, open public meeting procedures, and ethics training for elected and appointed officials.

REPORTS OF COMMISSION MEMBERS

Commissioner Luxton reiterated his resignation from the Planning Commission mentioned earlier in the meeting, noting that he will continue to monitor events in the City. Other commissioners provided parting comments and thanked Commissioner Luxton for his service to the Commission.

ADJOURNMENT

Commissioner Young made a motion to adjourn the meeting. Commissioner Smith seconded the motion. The motion passed unanimously (7-0).

The meeting adjourned at 8:28 p.m.

Zach Trevino, Secretary

Ben Stanley, Chair

MINUTES PREPARED BY: Zach Trevino, Secretary



MEMORANDUM

DATE: September 14, 2022

TO: Port Angeles Planning Commission

FROM: Planning Division Staff

RE: Staff Response to Planning Commission Proposed Amendments to Title 17

In an effort to assist the Planning Commission and move the amendment process forward, Planning Division staff has prepared a memorandum addressing the amendments to Title 17 of the Port Angeles Municipal Code (PAMC) initially brought forward by former Planning Commissioner Stephen Luxton. This response provides constructive feedback accompanied by historical context and the rationale behind staff's analysis of the Planning Commission's unanimously adopted motion to move forward with the proposed Title 17 amendments. Each suggested amendment is provided an individual response and staff recommendation, which staff can elaborate on at the September 14th Planning Commission meeting as necessary. The original document suggesting the amendments is included in the appendix.

Changes to Chapter 17.08 – Definitions

➤ Rearrangement of dwelling type definitions

Staff understands the desire of the Commission to allow users of the PAMC to efficiently find entries for commonly used terms, including different types of dwelling units. However, there is a benefit to having all definitions for the multiple types of dwelling units allowed in the City in one section for ease of reference and comparison. One possible solution would be to take a hybrid approach that retains the definitions of different types of residential dwellings in Section 17.08.025 PAMC, while adding corresponding definitions in the appropriate sections for each type of dwelling unit, so users can find the definition regardless of which place they look first. For example, the definition for *Dwelling, single-household* should remain in Section 17.08.025 PAMC, while a definition for "single-household dwelling" is added to Section 17.08.095 PAMC. Either the definitions should be identical, or one should reference the other in the manner commonly used in glossaries (e.g. See *Dwelling, single-household*) to ensure that users obtain the same information regardless of where they look for a definition in Chapter 17.08 PAMC.

➤ Take multi-family definition from Chapter 17.46 and add it to Chapter 17.08

The definition of "*Multi-family housing*" as used in Section 17.46.020 PAMC is derived from RCW 84.14.010 and is not meant to be applied to any other scenario in the City of Port Angeles other than those activities undertaken pursuant to Chapter 17.46 - PROPERTY TAX EXEMPTIONS FOR MULTI-FAMILY HOUSING. As such, staff believes it beneficial to update the definition found in Section 17.46.020 PAMC to reflect this status rather than updating the definition found in Chapter

17.08 PAMC. A sentence could be added to the definition in Section 17.46.020 PAMC stating something similar to “The definition of “multi-family housing” as included in this section is derived from Washington State law, is for use only in relation to property tax exemptions as regulated by Chapter 17.46 PAMC, and shall not be applied to other occurrences of “multi-family housing” or similar terms elsewhere in the PAMC.”

➤ Add “corner shop” definition

Staff supports this proposal. As part of the amendment process, research can be done to provide an updated definition based upon similar definitions from other municipalities within Washington State.

Changes to Chapter 17.10 - R7, Residential, Low Density Zone

➤ Removal of pluralism for “single-household dwellings” and “duplexes”

Staff does not support this proposal. In municipal code language generally, “zones” are defined differently than “property”. Whereas a single property might currently allow only one duplex due to Comprehensive Plan land use standards, a zone is an overlay over multiple properties that provides standards for design and use. More than one duplex is allowed in the R7 zone. In fact, there are currently no minimum and maximum density standards for duplexes in the zone as a whole, which is one reason why the use of the term is plural in Section 17.10.020 PAMC. The zone’s density is meant to be controlled by the minimum and maximum lot sizes, dependent upon whether the lot has access to an alley. In other words, use of plural terms in a list of permitted uses for a zone does not imply that multiple structures of that type can be permitted on a single property in that zone.

Moreover, Section 1.04.020 PAMC makes it clear that use of the plural can connote the singular in the PAMC, and vice versa. Given this rule, current language of Section 17.10.020 PAMC does not imply that multiple duplexes can be permitted on one lot in the R7 zone, even though the zone allows “duplexes” as a use. The same can be said for single-household dwellings.

➤ Defining minimum lot size for certain permitted uses in Section 17.10.020 PAMC

With the potential for multi-family development in the R7 zone, staff does not see this change as being necessary. Table 17.10.050-1 PAMC already defines minimum lot area for all lots in the R7 zone, regardless of primary use. However, there is not currently a maximum net density specified. Staff suggests changing the density maximum to 1 dwelling unit per 1,750 square feet of lot area, allowing for 2 dwelling units on a 3,500 square foot lot and 4 dwelling units on a 7,000 square foot lot. No change should be made to the minimum lot area.

➤ Addition of two duplexes

Staff does not support this proposal, but does support its intent regarding density of development, which is to allow for four dwelling units on a single lot. Staff supports the allowance of multi-family housing in the R7 zone and the provision of maximum density standards that will control the total

number of units allowed per square foot of lot area.

➤ Addition of multi-family buildings containing up to four units on a 7,000 square foot lot

Staff supports this change and has also determined that this is already allowed for detached structures. Section 17.21.30 PAMC, which establishes development requirements for cottage housing development, currently defines each cottage as being counted as one-third of a dwelling unit. There are no minimum lot size standards applicable to cottage housing, as long as the housing complies with density standards of the zone. Cottage housing is also subject to design standards including those related to separation, height, size, open space, and roofed porches for those cottages facing open space.

Inclusion of multi-family housing of up to 4 units per 7,000 square feet would require basic design standards to ensure that the use is harmonious with the surrounding neighborhood. These standards could include height, open space, screening, setback, and location along certain street classifications. Amending the PAMC to allow multi-family housing in the R7 zone would also require a Comprehensive Plan Amendment.

RCW Chapter 84.14 – “New and Rehabilitated Multiple-Unit Dwellings in Urban Centers” was recently amended to define multiple-unit housing to include a building *or a group of buildings* having four or more dwelling units not designed or used as transient accommodations and not including hotels and motels. Using this definition and a maximum density standard of one unit per 1,750 square feet would allow for a multi-family tax exemption to be utilized for the property, which would help incentivize this type of development.

➤ Addition of “corner shop” to conditional uses

Staff supports this proposal. Adding commercial uses into Euclidean based residential zones will ultimately improve quality of life for the residents of Port Angeles. This proposal is a small step in a larger effort staff is interested in initiating to amend the Comprehensive Plan Future Land Use Map and rezone certain areas that are currently zoned residential and abut minor and primary arterial streets to allow for more flexibility in use, including mixed use structures and a mix of uses on separate properties. This could include the redesignation of some streets to extend mixed use development corridors into primarily residential districts, thereby creating more commercial edges.

Staff suggests including this conditional use in all residential zones. The corner shop use will allow for limited commercial uses on local access streets that abut collector arterials, or at any intersection within an area zoned RMD or RHD. The use should be accompanied by design standards that ensure it exists harmoniously with the surrounding residential development.

Changes to Chapter 17.11 - R9, Residential, Low Density Zone

➤ Removal of pluralism for “single-household dwellings” and “duplexes”

See the above discussion of this proposed amendment in the R7 zone, which is also applicable to

the proposal in the R9 zone.

➤ Addition of “corner shop” to conditional uses

See the above discussion of this proposed amendment in the R7 zone, which is also applicable to the proposal in the R9 zone.

Delete Chapter 17.23 – Commercial Arterial and its reference in Chapters 17.01 and 17.03

Staff supports this proposal. This is a scrivener’s error. The chapter has been removed, and was not intended to appear in the PAMC, especially considering that standards applicable to the Commercial Arterial zone are also contained in Chapter 17.20. Chapter 17.01 does need to be reviewed and changed to address this as well. References remain in the PAMC for obsolete chapters that individually address commercial zones, which have all been included in Chapter 17.20 – Commercial Zones. The intent of the consolidated chapter addressing all commercial zones was to simplify the use of the PAMC for developers of commercial property.

Delete Chapter 17.25 – Commercial Regional and its reference in Chapters 17.01 and 17.03

Staff does not support this proposal. The Commercial Regional zoning designation has been assigned to areas within the Urban Growth Area (UGA) along the Highway 101 corridor that are not yet annexed into the City of Port Angeles. While these properties are not currently zoned Commercial Regional, that zone is their intended designation if the properties are ever annexed. The zone was intended to remain independently designated outside of the other commercial zones covered by Chapter 17.20 because of this unique situation. If any of the areas designated in the UGA are annexed at some point in the future, retention of this chapter will ensure the City already has standards in place to govern development on those properties.

Delete Chapter 17.45 – Infill Overlay Zone

Staff does not currently support this proposal. Staff intends to review and propose consolidation of the City’s various overlay zones into a single overlay zone process during Phase II of the Building Residential Capacity code changes. Until that occurs, the Infill Overlay Zone serves a unique and necessary purpose.

Replace occurrences of “apartments” with “multi-family building” throughout Title 17

Staff agrees with this recommendation and believes that eliminating or replacing the terms “apartment building” or “apartment” throughout Title 17 in favor of using the term “multi-family dwelling” as defined in Section 17.08.025 PAMC would be an improvement. This should increase flexibility, decrease redundancy in use of terms, and eliminate the potential for confusion of terms by staff and developers. “Apartment” is not defined in Chapter 17.08 PAMC, so it is unclear why it is currently distinguished from “multi-family dwelling” in certain sections throughout Title 17.

Appendix

Exhibit A: Original Suggestions Presented by Commissioner Stephen Luxton

Addition of commercial uses in residential zones

Add below definition to Title 17 - Zoning: Definitions "C"

Corner Shops

Corner shops are establishments such as cafes, restaurants, convenience stores, lounges, coffee shops, food, vegetable and fruit stands and pubs developed on corner lots where streets face on two sides. Corner shops are developed in residential zones to promote walkability, community economic development, sustainability and health. No corner shop shall have a gross floor area greater than 1000 sq ft. Corner shops shall not conduct business later than 9PM or before 7:30 AM.

Add below Conditional Use in R7, R9 and R11

Corner Shops

Fixes and expansions of uses within the R7 zoning without density increases - additions in red

17.10.020 Permitted uses.

- A. Adult family home.
- B. Single-household **dwelling. Minimum lot size 5000 sq. f.**
- C. Small lot single-household dwelling. **Minimum lot size 3500 sq. f.**
- D. Exempted home occupations.
- E. Child care provider.
- F. Group living.
- G. **Duplex. Minimum lot size 3500 sq. f.**
- H. Cottage Housing
- I. **Two Duplexes. Minimum lot size 7000 sq.f.**
- J. **Multi-Family. Maximum of 4 units. Minimum lot size 7000 sq. f.**

Fixes for the R9 - additions in red - Correcting plural uses

- A. Adult family home.
- B. Single-household **dwelling**.
- C. Exempted home occupations.
- D. Child care provider.
- E. Group living.
- F. **Duplex**.
- G. Cottage housing.

Fixes to Commercial Zones/Block Frontages

When Building residential capacity was brought in, it overwrote three of the city's six commercial zones and repealed one. Now some of the commercial zones have their own chapter and others don't. 17.20 was supposed to be a consolidated chapter to cover all 5 commercial zones.

Delete chapter 12.23: Commercial Arterial

Delete chapter 17.25: Commercial Regional

Delete references in 17.01 and 1703

This zoning does not exist anywhere and is not even on the City zoning map legend. It's not included in the new 17.20 zoning chapter. CR should be removed as a zone and deleted from the code.

Infill Overlay Zone 17.45 - Pointless and unneeded

Delete Infill overlay zone 17.45

Our residential zoning already allow density higher than what could be achieved by utilizing this overlay. Rendering it pointless.

Exhibit A

Fixes to definitions 17.08

Instead of having all the different types of residential buildings under definition “D” Dwellings, remove dwelling from in front of the building types and put them in the definitions page so they are consistent with how they appear in the permitted uses, conditional uses and accessory use tables throughout the rest of the code.

Take Multi-family definition from 17.46 and add it to 17.08 Definitions “M”

Multi-family is defined in 17.08 as three units or more and in 17.46 as four units or more.

Swap Multi-Family for Apartments everywhere in the entire code. Where an apartment house or apartment building appears, swap from multifamily building.