



# CITY OF LAKE FOREST PARK PLANNING COMMISSION SPECIAL MEETING

Thursday, April 04, 2024 at 7:00 PM

Meeting Location: In Person and Virtual / Zoom  
17425 Ballinger Way NE Lake Forest Park, WA 98155

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## INSTRUCTIONS FOR PARTICIPATING IN THIS MEETING VIRTUALLY:

**Join Zoom Webinar:** <https://us06web.zoom.us/j/85451347181>  
**Call into Webinar:** 253-215-8782 | **Webinar ID:** 854 5134 7181

The Planning Commission is providing opportunities for public comment by submitting a written comment or by joining the meeting webinar (via computer or phone) or in person to provide oral public comment.

### **HOW TO PARTICIPATE WITH ORAL COMMENTS:**

If you are attending the meeting in person, there is a sign-in sheet located near the entrance to the room. Fill out the form and the presiding officer will call your name at the appropriate time. Oral comments are limited to 3:00 minutes per speaker.

If you are attending the meeting via Zoom, in order to address the Commission during the Public Comment section of the agenda, please use the “raise hand” feature at the bottom of the screen. Oral comments are limited to 3:00 minutes per speaker. Individuals wishing to speak to agenda items will be called to speak first in the order they have signed up. The meeting host will call your name and allow you to speak. Please state your name and whether you are a resident of Lake Forest Park. The meeting is being recorded.

Instructions for how to make oral Public Comments are available <https://www.cityofflp.gov/617>

### **HOW TO SUBMIT WRITTEN COMMENTS:**

<https://www.cityofflp.gov/617/Hybrid-Planning-Commission-Meetings>

Written comments for public hearings will be submitted to Planning Commission if received by 5:00 p.m. on the date of the meeting; otherwise, they will be provided to the Planning Commission the next day. Because the City has implemented oral comments, written comments are no longer being read under Public Comments.

For up-to-date information on agendas, please visit the City’s website at [www.cityofflp.gov](http://www.cityofflp.gov).

# AGENDA

1. **CALL TO ORDER: 7:00 P.M. (confirm recording start)**

2. **PLANNING COMMISSION'S LAND ACKNOWLEDGEMENT**

*We'd like to acknowledge we are on the traditional land of a rich and diverse group of Native Peoples who have called this area home for more than 10,000 years. We honor, with gratitude, the land itself and the descendants of these Native Peoples who are still here today.*

3. **APPROVAL OF AGENDA**

4. **APPROVAL OF MEETING MINUTES**

A. Approval of March 12, 2024 Regular Meeting Minutes

5. **MEETING DATES**

6. **PUBLIC COMMENTS**

*The Planning Commission accepts oral and written citizen comments during its regular meetings. Written comments are no longer being read during the meeting. **Comments are limited to three (3) minutes.***

7. **REPORT FROM CITY COUNCIL LIAISON**

8. **OLD BUSINESS**

A. 2024 Comprehensive Plan Update-Housing Study

LFP Housing Discussion Guide  
LFP Housing Element Goals & Policies  
LFP Housing Element Background Analysis  
LFP RDI Analysis - Background Analysis  
LFP Middle Housing Feasibility and Recommendations Report

B. 2024 Comprehensive Plan Update- Transportation Discussion

C. 2024 Comprehensive Plan Update- Climate Update Status

9. **NEW BUSINESS**

A. Formation of a Climate Policy Advisory Team

10. **REPORTS AND ANNOUNCEMENTS**

11. **ADDITIONAL CITIZEN COMMENTS**

12. **AGENDA FOR NEXT MEETING**

13. **ADJOURN**

*Any person requiring a disability accommodation should contact city hall at 206-368-5440 by 4:00 p.m. on the day of the meeting for more information.*

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**City of Lake Forest Park - Planning Commission  
Draft Regular Meeting Minutes: March 12, 2024  
In-person and Zoom Hybrid Meeting**

**Planning Commissioners present:** Maddy Larson; Cherie Finazzo; Meredith LaBonte; Lois Lee, Chair  
Ashton McCartney; Sam Castic; Melissa Cranmer (via zoom); David Kleweno; Vice Chair Janne Kaje

**Staff and others present:** Mark Hofman, Community Development Director, Nick Holland, Senior Planner;  
Sarah Phillips, Climate Committee Chair; Cristina Haworth (via zoom)

**Members of the Public:** Don Fiene; Chelsea Lee

**Planning Commissioners absent:** Maddy Larson; Cherie Finazzo; Councilmember Bodi

**Call to order:** Chair McCartney called the meeting to order at 7:03 pm.

**Land Acknowledgement:** Cmr. LaBonte read the land acknowledgement.

**Approval of Agenda**

Cmr. Kleweno made a motion to approve the agenda, Cmr. LaBonte seconded, and the motion to approve the agenda was carried unanimously.

**Approval of Meeting Minutes**

Cmr. Castic made a motion to approve the March 4, 2024, special meeting minutes. Cmr. Lee seconded the motion.

All voted to approve the February 13, 2024, minutes as amended, and the motion was carried unanimously.

**Meeting Dates:**

The next special meeting is scheduled for April 4, 2024. The next regular meeting is scheduled for April 9<sup>th</sup>. Several Commissioners indicated that they may miss the meeting due to school district spring break schedules.

**Citizen Comments**

None.

**City Council Liaison Report**

Councilmember Bodi was not in attendance. Chair McCartney suggested having a Council update when Councilmember Bodi is in attendance.

**Old Business**

***Comprehensive Plan Update***

***Transportation Element Discussion***

Chair McCartney suggested reviewing the transportation section language, as presented by SCJ Consultants. She recommended that Ms. Haworth present the information she has prepared for the transportation element. Ms. Haworth introduced the material and went over the schedule for tonight’s meeting. She mentioned that tonight’s information is very similar to that of the special meeting last week. She talked about the difference between the use of the terms ‘equality and ‘equity’. She suggested that the Commission give their opinions on which term to use and in which context. Cmr. LaBonte said she prepared a statement to

1 share regarding the topics of equality and equity to share with the group. She read a couple of quotes she  
2 found and then shared her own statement with the group. Chair McCartney thanked her for her statement  
3 and time spent on it. She asked the group for input. Cmr. Kleweno asked for some clarity as it related to the  
4 slides presented by Ms. Haworth. Cmr. LaBonte elaborated on her statements and explained the background  
5 to her thoughts. Cmr. Kleweno said he wanted to make sure he understands the meaning of the statements.  
6 Discussion continued on Cmr. LaBonte’s statement and how it relates to planning policies in LFP. Cmr.  
7 Kaje said he appreciated the statement and said he sees the issue differently, as his position as a public  
8 servant. He provided some examples of equity, that he experiences through his professional work. He said  
9 that the policies developed through the governmental process are often made by a narrow group of people  
10 and not by those who may not know how to participate or even understand the notion of participation. Cmr.  
11 Lee asked Cmr. LaBonte if there are areas in the comprehensive plan that could be identified and changed for  
12 this purpose. Cmr. LaBonte provided a response and indicated that the language should not include  
13 references to race. Cmr. Lee shared a story about her background and how she relates to the governmental  
14 process. She said that language that supports minority racial groups should be included, because those  
15 groups may not feel comfortable participating in the policy making process. Cmr. Lee and LaBonte  
16 continued to discuss the issue of equality and how it is reflected, referenced, and used in the policy planning  
17 documents. Cmr. Castic provided his opinion on the issue and made a brief statement. He suggested moving  
18 on with analysis of the transportation element. Cmr. Cranmer provided her perspective on use of the terms  
19 and her experience. Chair McCartney summarized the issue and moved the group onto continued analysis of  
20 the draft language. Director Hofman provided guidance on how the group needs to include the mandates of  
21 equity by way of GMA requirements.

22  
23 Ms. Haworth thanked the Commission for the discussion and said that the information was very useful. She  
24 presented the updates for the comprehensive plan and reminded the group of the statutory requirements the  
25 state mandated. She presented the information prepared by Fher and Peers, the transportation sub-  
26 consultant who teams with SCJ. Ms. Haworth said that the current transportation element of the LFP  
27 comprehensive plan is generally consistent with the various state agency mandates, but that it could be  
28 amended to minimize conflicts between freight mobility and general transportation methods along truck  
29 route corridors. She talked about the need for a continued development of traffic calming in sections of LFP  
30 neighborhoods. She continued to present the findings and recommendations from the sub-consultant, as  
31 they relate to potential updates to the transportation element. She also talked about how the climate element  
32 blends with the transportation element for an overall strategy to create policies. Ms. Haworth said that non-  
33 motorized transportation options should be prioritized in the transportation planning process. Cmr. Kaje  
34 asked about the emphasis on stormwater system improvements to prevent tire and rubber runoff in the Lyon  
35 Creek basin, as it was drafted. He suggested having the recommendations in all of the watershed basins, not  
36 just Lyon Creek. Ms. Haworth suggested having a conversation about non-motorized levels of services  
37 standards and potentially including those in the comprehensive plan. She also suggested updating the capital  
38 improvement plan to identify funding sources for transportation improvement projects. Director Hofman  
39 said that his suggested notes have been forwarded to SCJ so that they have the Commission’s input in the  
40 draft suggestions. Cmr. Castic asked for clarity on what the ‘MPP’ sections quoted referred to and Ms.  
41 Haworth responded and indicated that they come from the countywide planning policies. Cmr. Castic  
42 suggested finishing transportation prior to moving onto the next section. Ms. Haworth presented the  
43 information on freight, Cmr. Kaje asked for background information on the freight conversation. Director  
44 Hofman responded and provided some background information on how the freight corridor is classified in  
45 LFP. Cmr. Castic provided his opinion on what suggestions to include for the freight topic. Chair  
46 McCartney directed Ms. Haworth to write in just the minimum requirements for freight. The feeling of the  
47 Commission was to maintain local street character in the majority of LFP neighborhoods. Ms. Haworth  
48 presented the recommendation on reducing the need for new capital improvements through investment  
49 operations and management activities that improve the existing system. Cmr. Lee suggested incorporating a  
50 policy for safe pathways to city and public park lands. Ms. Haworth presented the information on  
51 transportation resilience. The Commission agreed to incorporate the required language. Ms. Haworth  
52 presented the requirement for transportation technologies, such as electric vehicle infrastructure in multi-

1 family zoned projects as suggested by Cmr. Lee. Ms. Haworth continued to present the requirements for the  
2 transportation element that are mandated by the state and county, as well as recommendations by the sub-  
3 consultant for which LFP Commissioners could have discussions about adding into the comprehensive plan.  
4 The required element of racial and social equality came up and the discussion surrounding Cmr. LaBonte’s  
5 statement and her opinions continued, she elaborated on her position. Chair McCartney asked if the  
6 Commission had any alternative language, she offered some alternative language. Cmr. Lee provided some  
7 alternative language for this requirement. Ms. Haworth presented the information on stormwater pollution  
8 for transportation corridors. Director Hofman provided his notes from the previous discussion to include  
9 and indicated that the section will need to be drafted, then evaluated. Ms. Haworth presented the  
10 recommendations on concurrency, the Commission decided to go with only the required portion of the  
11 recommendations. Ms. Haworth presented the information on future travel forecasts. Chair McCartney did a  
12 time check and suggested moving onto the next section, given the time left. Ms. Haworth finished presenting  
13 the recommendations in the transportation element and Director Hofman shared his notes from the special  
14 meeting on the topics.

15  
16 It was decided that the group needed to discuss community outreach prior to the discussions on Climate  
17 topics.

18  
19 ***Outreach Plan Status and Community Survey Status***

20  
21 Ms. Haworth said that the outreach plan has been a bit slow, due to the grant funding received for housing,  
22 but the survey is ready to distribute very soon. She said a testing session for the survey is planned, and then  
23 the survey will be out the community very soon. Director Hofman provided his input and asked the  
24 Commission if the survey should be a mailer that is distributed citywide. Discussion occurred about the  
25 costs of a citywide mailer and the benefit associated. Chair McCartney provided her perspective and said that  
26 a citywide mailer would be a worthwhile expense. Cmr. Kaje said he agreed. The Commissioners provided  
27 their opinions, a majority voted to mail a survey to each property in the city. Cmr. Castic suggested that the  
28 Commission spread the word about the ability to have input in the process.

29  
30 Ms. Haworth said that a housing workshop will be needed soon, probably sometime in April. She mentioned  
31 that the topic of middle housing will be emphasized. She then said that the draft comprehensive plan would  
32 be discussed next. Cmr. Kaje thanked those who participated in the sub-committee for the public outreach  
33 process. He asked to see the draft survey prior to it being sent out. Director Hofman mentioned that an  
34 incentive prize will be offered to one lucky winner who participates in the survey process.

35  
36 ***Joint Meeting with Climate Action Committee***

37 Director Hofman mentioned that that the other boards and commissions have been consulted about the  
38 update to the comprehensive plan and the Climate Action Committee suggested having a joint meeting with  
39 the Planning Commission. He said it may not be possible, but that the idea would be presented to the  
40 Commissions for consideration. Cmr. Kleweno suggested postponing a potential future joint meeting, until  
41 the draft comprehensive plan is completed, so that appropriate comments can be made. Chair McCartney  
42 agreed. The Commission agreed to delay a joint meeting with the Climate Action Committee. Director  
43 Hofman said that the Planning Commission’s work plan for 2024 was approved by the City Council. He also  
44 said that within the next week, the Commission must form a joint climate policy advisory committee to  
45 coordinate with the Council. He said that the city has received a \$500k grant to draft the climate action plan.

46  
47 ***Climate Planning***

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49 ***Climate Action Plan (January 2024 Working Draft)***

50 Cmr. Castic said that the Commission very much agreed with the direction of the draft information presented  
51 by SCJ on climate. Director Hofman said that he had provided SCJ with notes from the last special meeting.  
52 Ms. Haworth summarized the required and mandated climate topics, as the state and county have laid out.

1 She talked about how the comprehensive plan will set the policy and the climate action plan will be the  
2 implementation document. She asked for some input from the Commission and had a couple of outstanding  
3 questions she was seeking answers to. Cmr. Kleweno talked about how the Climate Action Committee (CAC)  
4 needed a consultant to investigate the equity provisions of their climate action plan. Cmr. Lee suggested  
5 language for mitigating development on SR 522, as it relates to climate. Chair McCartney said they want to  
6 see language on equity and inclusion for the climate element.

7  
8 **New Business**  
9 Not applicable.

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11 **Reports and Announcements**  
12 None.

13  
14 **Citizen Comments:**  
15 Don Fiene said that the post office offers a method of getting mail to most of the city. He said it costs  
16 around \$4,500.00.

17  
18 **Agenda for Next Meeting:**  
19 Additional discussion on comprehensive plan amendments. Director Hofman provided some details about  
20 housing, which is the next chapter for discussion. Ms. Haworth provided an indication on when the  
21 Commission would see draft transportation language.

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23 **Adjournment:**  
24 Cmr. Castic made a motion to adjourn the meeting, Cmr. Kleweno seconded, and the motion was carried  
25 unanimously. The meeting was adjourned at 9:03 pm.

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27 APPROVED:

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31 Ashton McCartney, Planning Commission Chair  
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# Housing Element & Middle Housing Discussion Guide

## 2024 Comprehensive Plan Update & Middle Housing Code Update

**Date** March 29, 2024  
**To** Lake Forest Park Planning Commission; Mark Hofman, Lake Forest Park Planning Director  
**From** David Fiske, Andrew Oliver and Jennifer Shuch, Leland Consulting Group  
**CC** Cristina Haworth, SCJ Alliance

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### Introduction

This discussion guide is intended to assist the Lake Forest Park Planning Commission in their initial discussion of two separate but related work products relevant to the City’s approach to housing: 1) draft updates to the Comprehensive Plan Housing Element, and 2) draft report on Middle Housing Feasibility and Recommendations. Both of these documents have also been provided to the Commission as part of this packet. It sets out relevant state, regional, and county requirements, policies, and background, and contains two sections of discussion questions, first on the Housing Element revisions and second on Middle Housing policy and regulations.

### GMA Housing Element Requirements

The Housing Element requirements of the Growth Management Act were substantially amended in 2021 by HB 1220, requiring a much more detailed analysis of future housing needs by income level as well as considerations of racially disparate impacts, exclusion, and displacement in housing. As outlined in the Department of Commerce’s *Guidance for Updating Your Housing Element*, the updated requirements for a housing element include the following:

- **Housing needs assessment (HNA):** *An inventory and analysis of existing and projected housing needs by income level as provided by the Department of Commerce that identifies the number of housing units necessary to manage projected growth.*
  - The City’s Housing Needs Assessment was updated as part of this Comp Plan update to include all of the required elements outlined by the Department of Commerce, and can be found in the Housing Element Background section. The key conclusions included:
    - Lake Forest Park’s population is aging, signaling a potential need for more accessible units
    - Renters face significant affordability challenges compared with homeowners in the city
    - Many people employed in Lake Forest Park do not get paid enough to afford to live in the community
    - Lake Forest Park is mostly built out, with significant environmental constraints and limited land availability. Most homes are large single-family detached units, with limited options for smaller housing types.
    - Ownership housing prices in Lake Forest Park are very high, and most homes sold in the past year would not be affordable to the average household in the city.
    - Lower-income residents and BIPOC communities are concentrated in areas of the city that allow multifamily housing. Creating more opportunities for infill in Lake Forest Park’s neighborhoods would help alleviate these spatial inequities.



- **Goals, policies and objectives:** *A statement of goals, policies, objectives and mandatory provisions for the preservation, improvement and development of housing, including policies for moderate density housing options in urban growth areas.*
  - The Goals and Policies are included in the attached Housing Element draft, and discussion questions are below. The Middle Housing work discussed further below also addresses the requirement to address moderate density housing options.
- **Residential land capacity analysis:** *Analysis to identify sufficient land to accommodate projected housing needs by income level.*
  - Lake Forest Park has sufficient land capacity to meet its projected housing needs by income level, primarily through multifamily zoning in the Southern Gateway, and to a lesser degree in the Town Center. Allowing more Middle Housing types and ADUs will also help contribute to meeting housing targets. A full discussion of the methodology and results of the land capacity analysis are included in the Housing Element Background Section.
- **Provisions for all economic segments:** *Adequate provisions to address existing and projected needs of households at all income levels, including documenting programs and actions needed to achieve housing availability, consideration of housing locations in relation to employment locations and consideration of the role of accessory dwelling units (ADUs) in meeting housing needs.*
  - Commerce has provided Adequate Provisions checklists to analyze barriers to production of needed units by income level which will be included as an appendix to the Housing Element. In addition, the city will be required to allow two ADUs per lot as mandated by House Bill 1337. Although Lake Forest Park is primarily residential, there is discussion of employment location in the Housing Element Background section, and provisions for new commercial space in the Town Center and Southern Gateway.
- **Address racially disparate impacts, exclusion, displacement and displacement risk:** *Identify policies and regulations that result in racially disparate impacts, displacement and exclusion, and implement policies and regulations that begin to undo these impacts. Also, identify areas that may be at higher risk of displacement and establish anti-displacement policies.*
  - Based on PSRC’s regional displacement risk map, Lake Forest Park has a low displacement risk, although there are significant disparities in income, race, and ethnicity in areas of the city, and a large amount of parcels with historic racially restrictive covenants. Further analysis can be found in the Racially Disparate Impacts Analysis (also provided as part of this packet) as well as in suggested revisions to Goals and Policies addressing displacement and exclusion below.

## PSRC VISION 2050 and King County Countywide Planning Policies

The housing element must also be consistent with PSRC Vision 2050 and King County’s Countywide Planning Policies. Many of the suggested updates to the 2015 Goals and Policies were drafted to better align with these documents, particularly around new housing planning requirements which flow from the 2021 changes to the GMA detailed above. Some key themes incorporated in the new goals and policies to better align with PSRC and King County policies include:

- Specifics of planning for future housing unit targets by income band.
- Additions of specific middle housing types and ADUs, and policies to allow more housing types in neighborhoods.
- Discussion of racially disparate impacts in past housing policy and future policies to address these historic inequities and mitigate future displacement risk.
- Adjustments of language to acknowledge the need for some changes in housing types and locations, such as near future high-capacity transit

Further details on specific suggested policy changes and related discussion questions can be found below under “Discussion Questions and Guidance.”

## Middle Housing Grant and Scope of Work

In 2023, Lake Forest Park received a Middle Housing Grant from the Washington State Department of Commerce to study and implement code amendments in compliance with RCW 36.70A.635 and related RCW sections codifying House Bill 1110.

Adopted in 2023, HB 1110 requires 77 cities, including Lake Forest Park, to update their Comprehensive Plan housing elements and development regulations to allow for middle housing in all residential zones by June 30, 2025. If jurisdictions fail to meet this deadline, the State will impose a model code in the stead of a locally adopted option (Lake Forest Park would be subject to the [model code](#) that applies to Tier 3 cities).

As a part of this work, LCG analyzed middle housing typologies and development feasibility in Lake Forest Park. This analysis is part of a larger effort to ensure Lake Forest Park's implementation of middle housing regulations and policies is compliant with HB 1110 and meets the unique needs and contexts of the city.

Though this work is a separate effort, this same team is working in parallel as part of the City's Comprehensive Plan update, and the Housing Needs Assessment conducted as a part of that planning effort helped inform the potential for new middle housing types within the city's residential areas.

## Discussion Questions and Guidance

### Housing Goals & Policies

- 1. Housing Supply and Diversity.** We recommend expanding and strengthening many of the policies under this goal in support of local objectives for inclusive housing outcomes and to address housing gaps identified in the Housing Needs Assessment, as well as to better align with new state, regional and county mandates and policies, by amending existing policies through the following actions:
  - Strengthen policy on access to housing with a more inclusive list of demographic groups (H-1.1)
  - Expand policy on adequate supply of land to include state mandates to plan for housing needs across all income levels, including emergency housing and permanent supportive housing (H-1.2)
  - Strengthen policy on variety of residential densities by stating the purpose of the policy to meet the needs of different incomes, life stages and tenure (H-1.3)
  - Expand policy on housing capacity to align with regional and county policies requiring regular monitoring of housing needs and effectiveness of housing partnerships and policies (H-1.4)
  - Reframe and strengthen policy on infill development and compact housing to focus on provision of middle housing as a means of meeting more diverse housing needs; updated call out on "clustered development" to provide a description of middle housing (H-1.5)
  - Expand and strengthen policy on mix of commercial and residential uses to include multi-unit development (middle housing and apartments) and clarify how housing can increase economic vitality through access to opportunity and services and proximity to transit (H-1.6)
  - Expand policy on housing types, sizes and affordability levels in a variety of settings to specifically focus on access to homeownership for BIPOC populations (H-1.7), as Policy H-1.3 already states overall intent to provide variety of housing types throughout the city.
  - Strengthen and expand policy on flexibility in zoning and development regulations by changing language of "support" and "consider" to "allow", clarifying the City's intent to amend zoning and regulations, and included other middle housing types.
  - NEW policy on equitable development to mitigate displacement and address impacts of racially disparate impacts

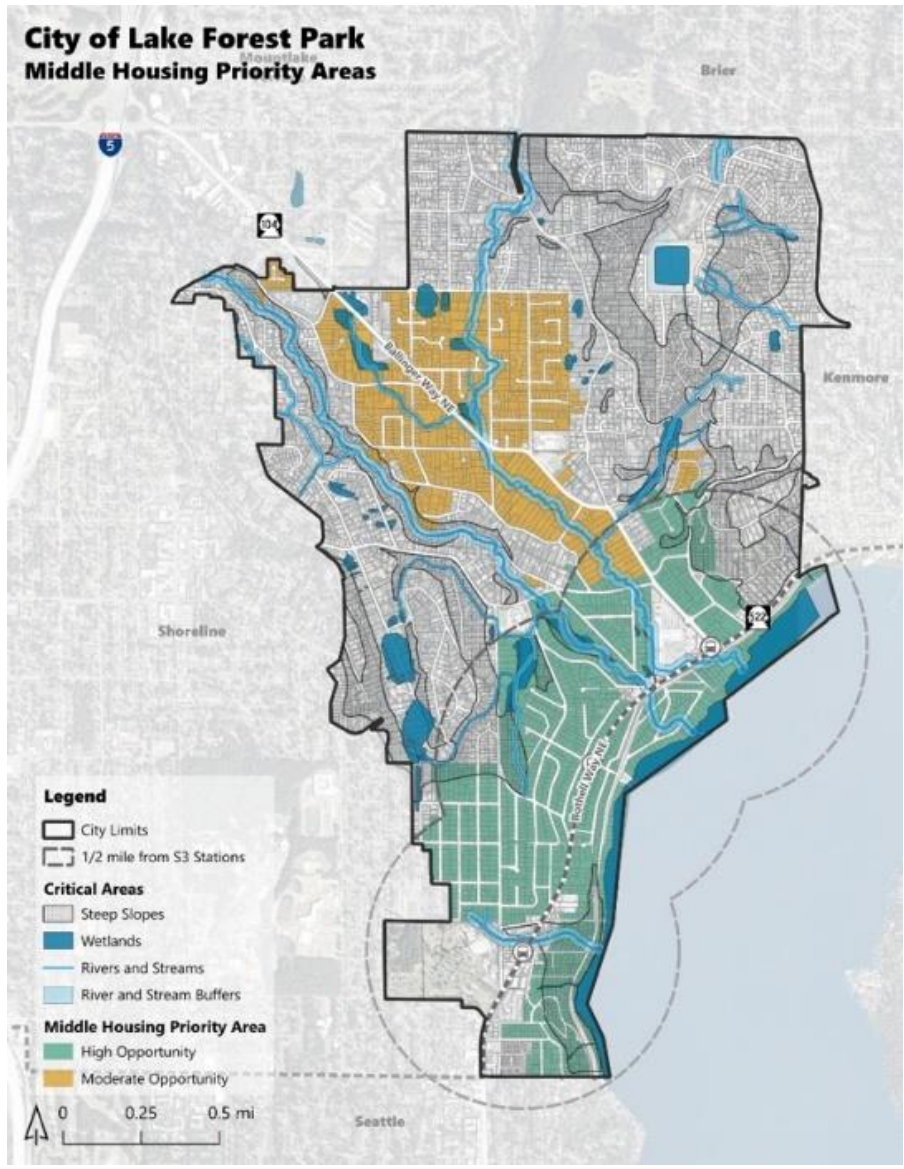
- a. Please discuss word choice and intention behind these policies. While most updates have been made to better align with state, regional and county requirements, it is important the language and intent of the policies align with local goals and objectives. What's missing? Are there any other policies we should consider?
  - b. Discuss how housing variety, especially middle housing, is represented and promoted through these policies. Should policies be more or less specific? Should more or fewer types of housing be listed? Do these policies accurately reflect the Commission's goals for expanding housing types throughout the city?
  - c. Consider how equity and inclusion are covered by these policies. Should they be strengthened or refined? Cities are required to deliberately address past and present racially disparate impacts and exclusive housing policies through their policies and implementation strategies. Do these policies adequately address the City's history of racially restrictive covenants and homogeneity of incomes?
2. **Housing Form and Scale.** We recommend amending this goal, and the policies within it, to remove exclusionary language stating intent to "preserve neighborhood character", and shift the direction to focus more on complementing form and scale of existing neighborhoods. Please discuss whether these updates still adequately capture the intent of original policy (if still relevant). Also consider whether other character-defining features of neighborhoods *beyond form and scale* should be highlighted through policy.
3. **Housing Affordability.** We recommend strengthening policies within this to goal better differentiate between income-restricted affordable housing and other forms of housing affordability, with most amendments and additions to policy language made to better align with state, regional and county policy direction. Please discuss word choice and intention behind these policies. What's missing? Are there other policies we should consider?
- a. Policy H-3.8 was shifted to strengthen language on the variety of City controlled policies, regulations or other barriers impacting overall housing costs and construction. Please discuss whether any of these should be prioritized or omitted.
  - b. NEW policy H-3.11 is included to align with state, regional and county mandates or policies to promote housing stability for renters and mitigate displacement. Displacement risk is low throughout Lake Forest Park, and strategies for addressing renter stability can be difficult to implement, especially for a city of Lake Forest Park's size and resources. Please discuss whether this is an area the City should consider exploring further.

## Middle Housing

Lake Forest Park is required by HB 1110 to plan for middle housing in all residential neighborhoods. As the City works to update its regulations to conform to state requirements, it should ensure that these changes are aligned with local priorities, including **opportunities for affordable homeownership, environmental stewardship of critical areas, and maintenance of the city’s lush tree canopy**. The questions below are intended to encourage discussion around how to balance state requirements and city priorities. The page numbers included with each discussion question reference additional detail in the Middle Housing Feasibility and Recommendations Report, also included in this packet.

1. **Location and Density.** While HB 1110 sets a baseline requirement that Tier 3 cities allow two units on all residential lots, Lake Forest Park could choose to allow more than two units in some residential areas. We recommend allowing more than two units in some areas of the city to balance housing needs and affordable homeownership goals with critical area and tree canopy protections. *Which of these options is most desirable?* (pgs. 58-59)

Option 1	Option 2	Option 3	Option 4
Limit middle housing to two units per lot in all residential areas.	Allow more than two units on lots in RS-7.2 and RS-15 zones within ½ mile of future BRT stops (the green area in the Middle Housing Priority Areas map below).	Allow more than two units on lots in the RS-7.2 and RS-15 zones within ½ mile of future BRT stops AND on lots zoned RS-7.2, RS-10, and RS-15 zones adjacent to Ballinger Way (the yellow area in the Middle Housing Priority Areas map below).	Allow more than two units on all residential lots throughout the city.



2. **Typologies and Form.** Lake Forest Park has some unique environmental constraints as well as a lush tree canopy that the community prioritizes preserving, while also containing relatively large lots with the potential to accommodate existing housing types. Allowing a wider array of housing in residential zones could help the city achieve its housing goals of additional affordability while limiting disruption to the natural environment. Multi-unit dwellings can be regulated and built at a compatible form and scale to existing single-family dwellings through the introduction of a form-based code that defines allowable uses based on the form of the building rather than the density of units. Other novel housing types that allow for unconventional orientations, like cottage clusters or front/side-yard ADUs, can also be regulated in a way integrates with existing tree canopy on lots. *To what extent is the City willing to explore building flexibility into its residential zoning code and development regulations to enable development around environmental constraints?* (pgs. 41-50, 60)

3. **Parking.** Many streets in Lake Forest Park are not designed to accommodate street parking. City code requires 1.5 parking spaces per unit of multifamily housing to ensure that there are adequate parking facilities for residents. However, if the City plans to allow more than two units per lot in some neighborhoods, it should consider reducing the parking requirements, calibrating required parking with the number of bedrooms and/or proximity to transit. This could potentially help limit tree removal and development in critical areas and improve the feasibility of a variety of middle housing types. *Are there neighborhoods within the city that could support additional on-street parking? Are there other ways that the City could support increased density while protecting the tree canopy?* (pg. 61)
  
4. **Development Regulations.** As the City embarks on writing its new middle housing code, it will have to determine how and whether to change existing development regulations to improve the feasibility of middle housing. Most impactful regulations include height, lot coverage, and floor area ratio (FAR). Lot coverage ratios are particularly important in the feasibility of middle housing types beyond two-units in some of your high opportunity areas. *Which (if any) of these regulations does the City view as essential to maintain, and which could be recalibrated to align with state regulations and city priorities?* (pgs. 61-63)
  
5. **Incentivizing Affordable Homeownership.** Allowing middle housing throughout the city will help increase opportunities for affordable homeownership, especially if denser typologies are allowed in some or all city neighborhoods. However, some additional policies and programs could help boost the supply of more affordable homes. These could include:
  - Partnering with affordable homebuilders and community land trusts to better understand the needs of the communities they serve and ensure that development regulations allow for these types of housing.
  - Incentivizing affordable housing development through density bonuses, fee waivers, or other programs.
  - Offering opportunities for fee-simple lot splitting to increase wealth building opportunities.
  - Establishing a funding source, such as an affordable housing trust fund, to support local affordable housing construction through direct subsidies or land purchases (the latter of which can contribute to a community land trust or similar).

*To what extent is the City interested in pursuing these types of policies or programs to achieve its goal of increasing more affordable homeownership opportunities?* (pgs. 26-27)

6. **Critical areas.** Lake Forest Park includes a number of critical areas, including waterways, slopes, wetlands and their buffers. It is a priority for the City to protect these areas and promote environmental resilience. HB 1110 offers two potential paths for protecting critical areas – a full exemption and an alternative compliance path. However, LCG recommends that the City not utilize these paths due to the number of large parcels with minimal constraints. *Which of the options below is most desirable?* (pgs. 32-33, 39, 64-69)

	<b>Option 1: Full Exemption</b>	<b>Option 2: Alternative Compliance Path</b>	<b>Option 3: Maintain Existing Regulations</b>
<b>Description</b>	HB 1110 gives cities the option to exclude all lots that contain critical areas (as defined by the GMA) from middle housing regulations.	The Alternative Compliance Path would allow Lake Forest Park to exempt up to 25 percent of its lots from increased density requirements. However, this must be weighed against the Racially Disparate Impacts of excluding middle housing in these areas.	Lake Forest Park currently prohibits the development of structures in critical areas and their buffers unless a property owner successfully pursues a Reasonable Economic Use Exemption.
<b>Considerations</b>	This type of blanket exemption would prevent the construction of any middle housing, including on large lots with minimal environmental constraints. The City already has a process for determining whether building should be allowed in critical areas. In addition, Commerce does not recommend fully exempting critical areas from middle housing regulations.	This option is complicated by the fact that there are a lot of parcels in Lake Forest Park that have racial covenants and would not be eligible for exclusion. In addition, this option is inferior to existing critical area regulations in Lake Forest Park.	Current regulations protect critical areas while ensuring that an adequate supply of housing can be built. The City may choose to consider allowing duplexes or other middle housing types with footprints no greater than 1,000 SF to be permitted through the Reasonable Economic Use Exemption.

**GOALS & POLICIES**

**HOUSING**

**Introduction**

The Housing Element addresses the preservation, improvement, and development of housing; identifies land to accommodate different housing types; and makes provisions for the existing and projected housing needs of all economic segments of the community. Lake Forest Park’s housing element ensures that there will be enough housing to accommodate expected growth in the city, and the variety of housing necessary to accommodate a range of income levels, ages, and special needs. At the same time, the element seeks to ~~preserve~~ ensure new housing is consistent with existing neighborhood ~~character~~ form and scale by including policies that will keep new development compatible.

Recognizing that housing is an issue in which multiple interests need to be balanced—including ~~community character~~ environmental conservation, demographic characteristics, and affordability—the Housing Element is supported by the Housing Element Background Analysis (Volume II). The background analysis reviews existing and projected housing needs and the housing inventory necessary to accommodate projected growth. This analysis prompts the City to consider the needs of current and future residents, which in turn informs policies that shape the zoning and development standards in place today and planned for the future. Information included in the Background Analysis includes:

- Planning context—summary of state and regional framework for housing planning
- Who we are—demographic characteristics and trends
- Where we live—what kind, how much and where is our housing
- Forecast of future need

**Commented [DF1]:** Should the introduction to Goals & Policies Include mention of new GMA requirements and other state legislation requiring cities to plan for middle housing and other new requirements?



## Goals & Policies

**Goal H-1 Housing Supply and Diversity.** Ensure that Lake Forest Park has sufficient quantity and variety of housing types to meet projected growth and needs of ~~the community~~ **people of all income levels and demographic groups.**

- **Policy H-1.1** Promote fair and equitable access to housing for all persons, regardless of race, religion, ethnic origin, age, household composition or size, disability, marital status, sexual orientation, or income.
- **Policy H-1.2** Provide an adequate supply of land to meet the city’s housing growth target, as established in the King County County-wide Planning Policies, for moderate-, low-, very low-, and extremely low-income households as well as emergency housing, emergency shelters, and permanent supportive housing.
- *Adopted and ratified in 2021-23, and amended in 2023, the King County Countywide Planning Policies (CPPs) provide a countywide vision and serve as a framework for each jurisdiction to develop its own comprehensive plan. As updated from the CPPs, the **Lake Forest Park growth targets are 551-870 housing units and 244-550 jobs by 2044, with other targets for housing needs by income and special needs**35.*
- **Policy H-1.3** ~~Provide~~ Increase the for a variety of residential densities and housing types allowed throughout Lake Forest Park’s residential areas to meet the needs of people of all incomes and life stages and increase access to housing for both renters and homeowners.
- **Policy H-1.4** Consider the impact of land use policies and regulatory decisions on housing capacity and diversity, when making land use policy and regulatory decisions and regularly monitor and assess existing and projected housing needs, gaps in partnerships, policies and dedicated resources for meeting housing needs of all segments of the population.
- **Policy H-1.5** Promote residential clustering-infill development of compact middle housing types as a means of meeting a more diverse range of housing needs while to protecting environmentally sensitive areas and encouraging infill development.
- ~~**Clustered development**~~ Middle housing means buildings that are compatible in scale, form, and character with single-family houses and contain two or more attached, stacked, or clustered homes. the grouping of buildings on small lots within a development site to preserve sensitive natural features, open spaces, or other important characteristics while increasing housing opportunity and choice.
- **Policy H-1.6** Encourage opportunities for multi-unit and mixed use development in areas where a mix of commercial and residential uses would promote desired character and economic vitality increased access to economic opportunity and services, including transit-oriented development near planned or existing transit stops and along transit corridors.
- **Policy H-1.7** Create opportunities for a variety of housing in a variety of settings types, sizes, and affordability levels throughout ~~the City~~ different settings and neighborhoods of the City as a recognition of historic inequities in access to homeownership opportunities for Black, Indigenous and People of Color communities.
- **Policy H-1.8** ~~Support~~ Allow for flexibility in zoning and development regulations to encourage a variety of housing types that responds to the diverse needs of a range of different household sizes, incomes and ages, including: Consider amending regulations to encourage more accessory dwelling units (mother-in-law units), duplexes, townhouses, small apartments, and other types of middle housing.

**Commented [DF2]:** Changed to focus on infill and middle housing instead of “clustered development”

- **Policy H-1.9** Continue to ensure that manufactured housing, as defined in the current building code, is allowed in all single family residential zones and regulated the same as stick-built housing.
- **Policy H-1.10** Adopt policies and strategies that promote equitable development, mitigate displacement of low-income households and address impacts of past and present racially exclusive and discriminatory policies and practices.

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**Commented [DF3]:** New policy

**Goal H-2 Neighborhood Character Form and Scale. Preserve Complement and enhance the unique character form and scale of the City’s residential neighborhoods while meeting the housing needs of existing and future residents.**

- **Policy H-2.1** Continue to incorporate clear and predictable site standards, landscaping, and building design guidelines into land use regulations to ensure that that integrate infill development complements surrounding uses and the character of Lake Forest Park with consideration to form and scale that complements surrounding uses while not creating additional barriers or increased costs to new housing development.
- **Infill development** is the process of developing vacant or under-used parcels within a surrounding area that is already largely developed.
- **Policy H-2.2** Promote site planning techniques residential neighborhoods that protect and promote create quality outdoor spaces and contribute to an equitable distribution of parks and open space throughout the city are in harmony with neighboring properties.
- **Policy H-2.3** Provide Develop guidelines for transitions and buffers around different types of uses that integrate and connect higher intensity uses with surrounding development to enhance a sense of community in neighborhoods, in order to mitigate any negative impacts associated with higher intensity uses.
- **Policy H-2.4** Preserve and Enhance the condition of neighborhoods by supporting the maintenance and improvement of existing and housing through the both public and private investment and regulations.

**Commented [DF4]:** Removed any mention of “preserving neighborhood character” per RDI assessment and state guidance. Instead focusing on complementary form and scale.

**Commented [DF5]:** Reframed policy from overly restricted site planning guidelines that could be seen as a barrier to new development and aligned with regional policy to promote equitable distribution of open space.

**Commented [DF6]:** This is a departure from previous policy which mentioned higher intensity uses in a negative light. This language around integration is more in line with equity goals and considerations for multi-unit development.

**Goal H-3 Housing Affordability. Provide for a range of housing opportunities to promote access to housing that is address the needs of affordable, accessible, healthy, and safe to people of all economic segments of the community.**

*Affordable housing is generally defined as costing no more than 30% of gross household income. It also refers to income-restricted subsidized housing that meets the needs of low-income households. Additional information is provided in the Housing Element Background Analysis in Volume II.*

- **Policy H-3.1** Preserve and enhance Invest into neighborhoods with existing affordable housing stock by investing in existing neighborhoods to enhance access to opportunity and services.
- **Policy H-3.2** Implement and promote incentives to increase the supply of long-term income-restricted affordable housing for extremely low-, very low-, and low-income households i.e development of affordable housing, such as through density bonuses, height increases, tax incentives, and simplified and streamlined design requirements.

- **Policy H-3.3** Support and collaborate with non-profit and community-based organizations, and other local and regional partners, that fund, construct and manage income-restricted affordable housing.
- **Policy H-3.4** Encourage the development and preservation of location of new income-restricted affordable housing units near community amenities and services, particularly within walking distance to planned or existing high-capacity and frequent ~~such as~~ transit.
- **Policy H-3.5** ~~Support~~ Expand access to both rental and ownership forms of affordable housing in a wide variety of locations, types, and sizes to reduce disparities in access to housing and neighborhood choices.
- **Policy H-3.6** Encourage energy efficient design features in new affordable housing units.
- **Policy H-3.7** Connect residents to community-based organizations and programs providing information on affordable housing, financial literacy, and homeownership counseling.
- **Policy H-3.8** ~~Consider~~ Evaluate the impacts of City regulations and policies on housing costs and supply, including development standards and regulations, permitting fees and timelines, parking requirements, and implement strategies to address impacts and overcome barriers and take steps to address impacts.
- **Policy H-3.9** Collaborate with regional jurisdictions to implement policies and strategies, and address funding gaps, meet housing growth targets and that address housing issues that cross jurisdictional boundaries.
- **Policy H-3.10** Work with community and regional partners, including the King County Housing Authority, to address the demand for special needs housing and affordable housing in Lake Forest Park and the surrounding area.
- **Policy H-3.11** Explore policies that protect housing stability for renter households and expand protections and supports for moderate-, low-, very low-, and extremely low-income renters and renters with disabilities.

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Commented [DF7]: New policy

**Goal H-4 Special Needs. Encourage and support a variety of housing opportunities for those with special needs, including older adults, people with disabilities, and the homeless.**

- **Policy H-4.1** Support measures that allow those with special needs to remain in the community as their housing needs change, including connecting them with available services and benefits.
- **Policy H-4.2** Explore creating incentives to encourage universal design to maximize building lifecycle and accessibility.
- **Universal design** *is the design of products and environments to be usable by all people, to the extent possible, without the need for specialized adaptation. Examples of universal design in a house could include wide doors, elimination of entrance steps, or electrical outlets installed higher up from the floor.*
- **Policy H-4.3** ~~Provide housing opportunity for~~ Ensure development regulations support housing opportunity for special needs populations in a variety of locations, including permanent supportive housing and emergency shelters, with a focus on high opportunity areas with access to transit and services, through development regulations.
- **Policy H-4.4** Incentivize the location of special needs housing near services and public transportation to promote access to jobs, medical care, social contacts, and other necessities.

- **Policy H-4.5** ~~Support Partner with~~ public and private ~~partners and prioritize the use of resources to support~~ housing services for people ~~who are experiencing~~ homelessness and others with ~~disproportionately greater housing needs.~~

**Goal H-5 Internal Consistency. Balance and maintain consistency between housing needs and related City policies, including land use, environmental preservation, human services, and economic development.**

- **Policy H-5.1** Provide physical infrastructure and amenities to support vibrant residential neighborhoods, consistent with adopted land use designations.

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# HOUSING BACKGROUND ANALYSIS

## Housing

### Introduction

This section contains background information supporting the goals and policies in the Housing Element of the Comprehensive Plan, including:

- Planning ~~context~~Context—summary of state and regional framework for housing
- ~~planning~~
- Who we are—demographic characteristics and trends
- ~~Where we live~~—what kind, how much and where is our housing
- ~~Where we work~~—commuting trends and jobs in Lake Forest Park
- ~~Forecast of future need~~

## Planning Context

### State & Regional Framework

The Housing Element requirements of the Growth Management Act were substantially amended in 2021 by HB 1220, requiring a much more detailed analysis of future housing needs by income level as well as considerations of racially disparate impacts, exclusion, and displacement in housing. As outlined in the Department of Commerce's *Guidance for Updating Your Housing Element*, the updated requirements for a housing element include the following:

- **Housing needs assessment (HNA):** An inventory and analysis of existing and projected housing needs by income level as provided by the Department of Commerce that identifies the number of housing units necessary to manage projected growth.
- **Goals, policies and objectives:** A statement of goals, policies, objectives and mandatory provisions for the preservation, improvement and development of housing, including policies for moderate density housing options in urban growth areas.
- **Residential land capacity analysis:** Analysis to identify sufficient land to accommodate projected housing needs by income level.
- **Provisions for all economic segments:** Adequate provisions to address existing and projected needs of households at all income levels, including documenting programs and actions needed to achieve housing availability, consideration of housing locations in relation to employment locations and consideration of the role of accessory dwelling units (ADUs) in meeting housing needs.
- **Address racially disparate impacts, exclusion, displacement and displacement risk:** Identify policies and regulations that result in racially disparate impacts, displacement and exclusion, and implement policies and regulations that begin to undo these impacts. Also, identify areas that may be at higher risk of displacement and establish anti-displacement policies.

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### PSRC VISION 2050 and King County Countywide Planning Policies

The housing element must also be consistent with PSRC Vision 2050 and King County's Countywide Planning Policies. Some key themes incorporated in the new goals and policies to better align with PSRC and King County policies include:

- Specifics of planning for future housing unit targets by income band.
- Additions of specific middle housing types and ADUs, and policies to allow more housing types in neighborhoods.
- Discussion of racially disparate impacts in past housing policy and future policies to address these historic inequities and mitigate future displacement risk.
- Adjustments of language to acknowledge the need for some changes in housing types and locations, such as near future high-capacity transit

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The Growth Management Act (GMA) requires that cities provide a comprehensive plan with a housing element that identifies sufficient land (zoning capacity) and strategies to accommodate existing and projected housing needs for all segments of the community. The Washington Administrative Code (WAC) identifies features of a housing element as listed below.

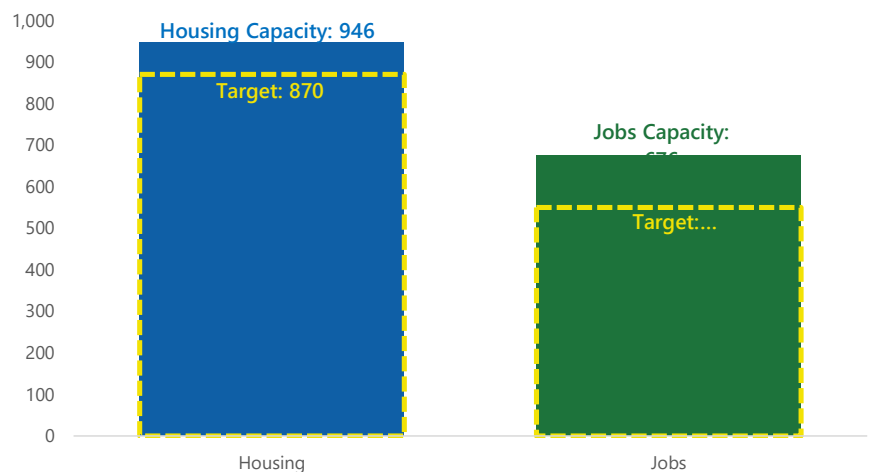
- a. Inventory and analysis of existing and projected housing needs.

- b. Statement of goals, policies, and objectives for preservation, improvement, and development of housing.
- c. Identification of sufficient land for housing including group homes and foster care facilities, government assisted, manufactured, multi-family, and low-income family housing.

Similarly, the Puget Sound Regional Council *VISION 2040* and King County Countywide Planning Policies (CPPs) provide guidance that also informs Housing Element goals and policies.

**Growth Targets & Land Capacity.** An overview of the Lake Forest Park growth targets for the 2035-2044 Comprehensive Plan update, and the City's land capacity to meet these targets is described in [Volume II, Land Use Element Background Analysis](#), [the HB 1220 Methodology and Results Report](#) and summarized in [Table II.2, 2035 Growth Targets and Land Capacity](#) below in Figure 1. As shown, the City's 2035-2044 growth target is 551-870 housing units and 244-550 jobs. The City has adequate land capacity to meet these targets without making any changes to its current land use or zoning designations.

**Figure 1. Net New Housing and Jobs Targets and Capacity in Lake Forest Park, 2019-2044**



The city also has targets for housing units by income band set by King County. These targets are set based on the city's allocation of countywide need for housing that can serve all economic segments of the population, as determined by the Department of Commerce. Lake Forest Park's targets by income band, as a percentage of Area Median Income, as well as the target for emergency housing capacity are shown below.

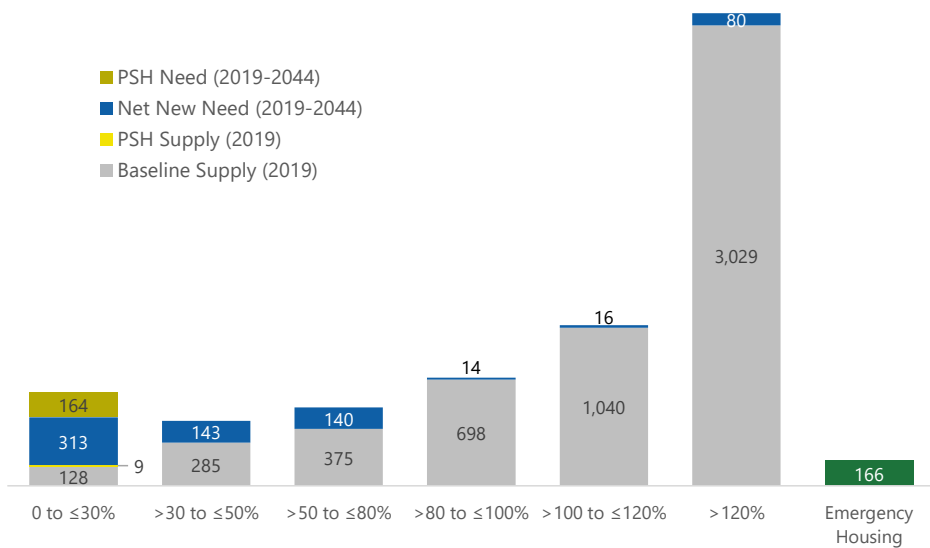
**Commented [AO1]:** Currently a separate document, can be integrated as an appendix or chapter to the Housing Element or stand-alone appendix to the Comp Plan depending on City/SCJ preference.

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Figure 2. Lake Forest Park Existing and Target Housing Units by Income Band, 2019-2044



Source: King County 2021 Countywide Planning Policies (as amended in 2023)

As detailed further in the *HB 1220 Methodology and Results Report*, Lake Forest Park has sufficient zoned capacity to meet those targets. A summary table of the results of this analysis is shown below.

Figure 3. Lake Forest Park Housing Targets and Capacity by Income Band, 2019-2044

Income Band (% of AMI)	Zone Category	Housing Needs	Aggregated Housing Needs	Total Capacity	Surplus/ Deficit
0-30 PSH	Mid-Rise, Low-Rise	164	760	761	1
0-30 Non PSH		313			
30-50		143			
50-80		140			
80-100	ADUs, Middle Housing	14	30	68	12
100-120	16				
120+	Low Density	80	80	117	37
<b>TOTAL</b>		<b>870</b>	<b>870</b>	<b>946</b>	<b>76</b>

Source: Leland Consulting Group

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**Table II.2 2035 growth targets and land capacity**

	Housing	Jobs
2035 Target	551 units	244 jobs
Land Capacity	631 units	285 jobs

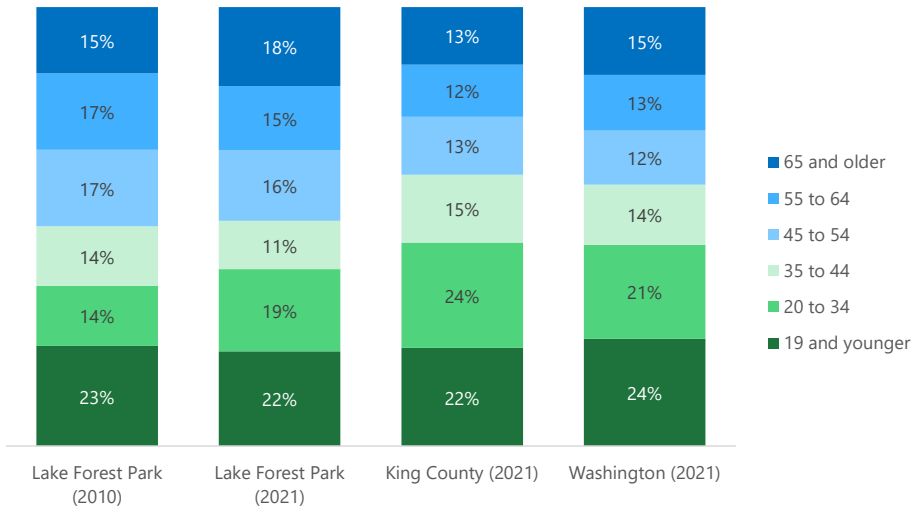
## Who We Are

The demographics described below provide a description of population and household characteristics in Lake Forest Park and neighboring communities.

*Age Characteristics.* Overall, the City's age profile has remained relatively stable since 2000, with a small decrease in persons below age 20 (25 percent in 2000 and 22 percent in 2012) and an increase in persons over age 65 (13 percent in 2000 and 17 percent in 2012). The median age of City residents is about 45 years, which is relatively older than the median age in surrounding cities. Comparatively, the City of Shoreline has a median age of about 41 years and Bothell has a median age of about 35 years. Please see Figure II.5 for the City's estimated population distribution by age. Lake Forest Park's population is substantially older than regional and statewide averages. Half of residents are over 45, compared to around 40 percent county and statewide. In addition, 18 percent of residents are over 65, compared to 13 percent countywide and 15 percent statewide. Since 2010, the share of residents over 65 has increased from 15 to 18 percent of the city's population, or an increase of 534 residents. At the same time, the city has also seen a significant increase in residents aged 20 to 34.

The age composition of Lake Forest Park's residents has important implications for housing needs in the city. An increasing share of older residents who may be "downsizing" can often signal the need for smaller housing units. On the other hand, an increasing share of young adults may result in new families which need more bedrooms. Older residents may also have specific housing needs such as accessible units or assisted living.

Figure 4. Age Distribution in Lake Forest Park with Regional Comparisons, 2010-2021



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Source: 2021 American Community Survey 5-Year Estimates, Table DP05, 2010 US Census, Table P12

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Figure II.5 City of Lake Forest Park population pyramid

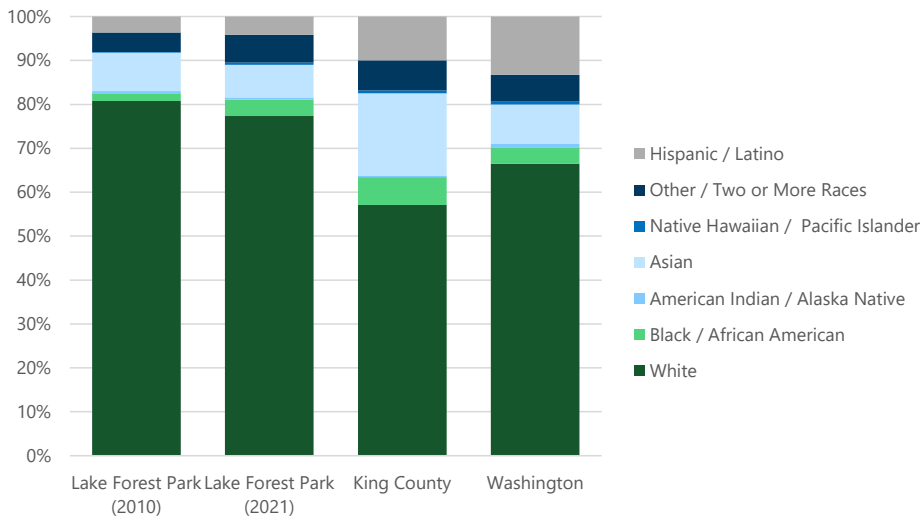


Source: U.S. Census Bureau, 2012 5-Year American Community Survey.

[Race & Ethnicity](#). The population of Lake Forest Park is significantly less ethnically and racially diverse than King County as a whole, with 77 percent of residents identifying as White, compared with 57 percent countywide. Of the city's non-White population, there are similar shares of Mixed-Race, and Asian populations at six to seven percent each, with smaller shares of Hispanic/Latino and Black residents (three to four percent) and Native American / Hawaiian residents (less than one percent). The city has become more diverse since 2010, with an overall increase in BIPOC residents, particularly mixed-race residents.

[When considering housing needs, race and ethnicity can present compounding challenges to housing affordability and accessibility](#). For example, in Lake Forest Park, 88 percent of homeowners are White, compared to only 57 percent of renters. Renters face greater housing instability than homeowners, and less opportunities for wealth-building. These type of reinforcing housing challenges are important to [consider when planning for the housing needs of all residents in the city](#).

**Figure 5. Race/Ethnicity in Lake Forest Park with Comparisons, 2010-2021**



[Source: 2021 American Community Survey 5-Year Estimates, Table DP05](#)

[This map below](#) shows the share of BIPOC (Black, Indigenous and people of color) populations by Census block in Lake Forest Park. There are noticeable concentrations of BIPOC populations in the Southern Gateway and Town Center areas. Notably, the Southern Gateway area allows denser multifamily housing than other parts of the city.

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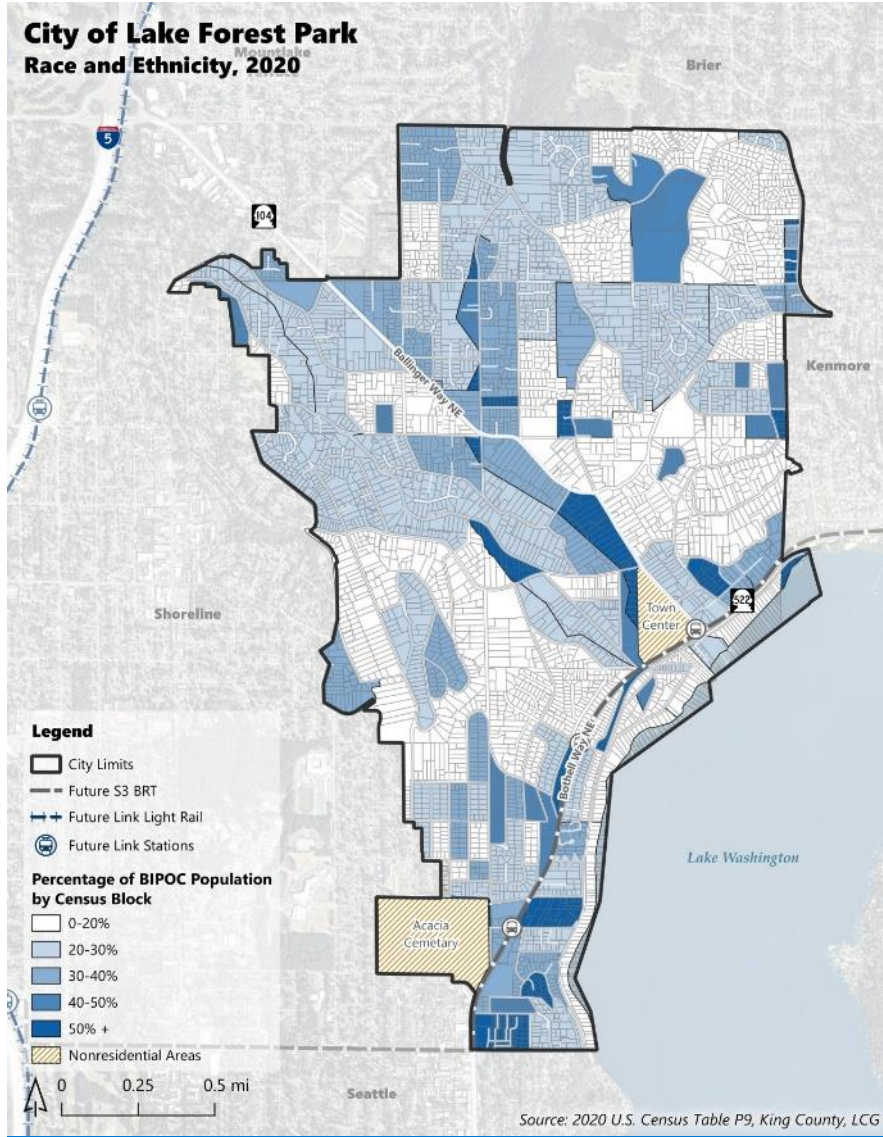
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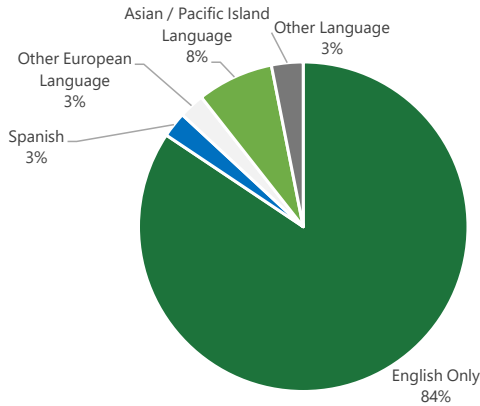
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Figure 6. Race and Ethnicity by Census Block in Lake Forest Park, 2020



The majority of households in Lake Forest Park speak English at home, as shown below, but about 15 percent speak other languages. Most of these residents also speak English, according to the 2021 American Community Survey.

Figure 7. Language Spoken at Home in Lake Forest Park, 2021



Source: 2021 American Community Survey, 5-Year Estimates, Table S1601.

**Household Characteristics.** Table II.3 and Figure II.6, on the following page, provide a comparison of 2000 U.S. Census and 2012 American Community Survey data for Lake Forest Park. As of 2023, there are 5,589 housing units in Lake Forest Park, up from around 5,100 in 2012 (an increase of just under 10% over that time). The majority of households in Lake Forest Park (69 percent) are family households. Of these, most are married couples. About 30 percent of Lake Forest Park households have children under 18. The city has a higher share of family households and of families with children than both King County and the state.

The other 31 percent of Lake Forest Park households are non-family households, which includes individuals living alone or any arrangement of unrelated residents. The majority of these households are residents living alone. Of these, 387 households are individuals over 65 living alone. This is a smaller share of older householders living alone than the county and state. The average household size in the city is 2.54, higher than the King County average of 2.44 and an increase from Lake Forest Park's 2010 average household size of 2.36.

This data shows a need in Lake Forest Park for both larger units to accommodate families and smaller units to accommodate residents living alone.

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**Figure 8. Household Type in Lake Forest Park, 2021**

	Lake Forest Park		King County		Washington	
	Total	%	Total	%	Total	%
<b>Total Households</b>	5,308		902,308		3,022,255	
<b>Family households</b>	3,680	69%	536,432	59%	1,937,081	64%
Married-couple family	3,242	61%	427,498	47%	1,503,723	50%
Other family	438	8%	108,934	12%	433,358	14%
With own children of householder under 18 years	1,521	29%	238,894	26%	809,198	27%
<b>Nonfamily households</b>	1,628	31%	365,876	41%	1,085,174	36%
Householder living alone	1,268	24%	269,580	30%	819,693	27%
Householder 65 years and over	387	7%	77,899	9%	304,599	10%

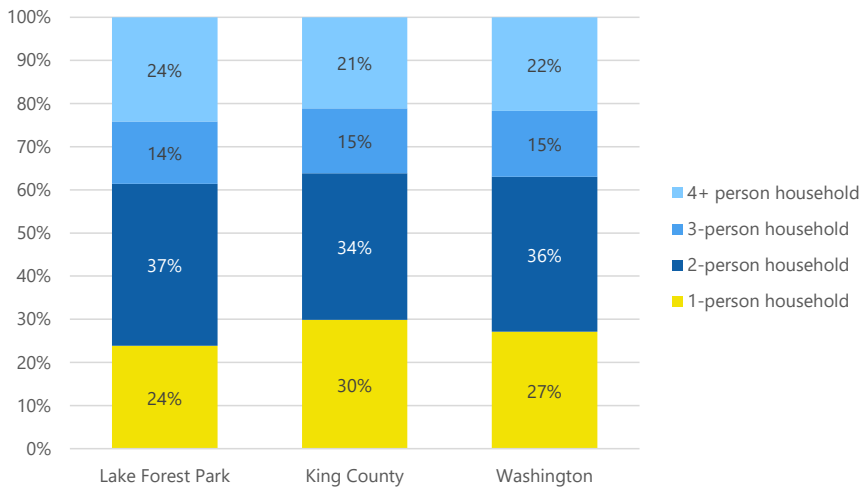
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Source: 2021 American Community Survey 5 Year Estimates (Table S2501).

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Lake Forest Park's households are similar in size to county and statewide averages. There is a slightly smaller share of one-person households than the county. Overall, the largest number of households are two-person households, at 37 percent.

**Figure 9. Lake Forest Park Household Size, 2021**



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Source: 2021 American Community Survey 5-Year Estimates, Table DP04

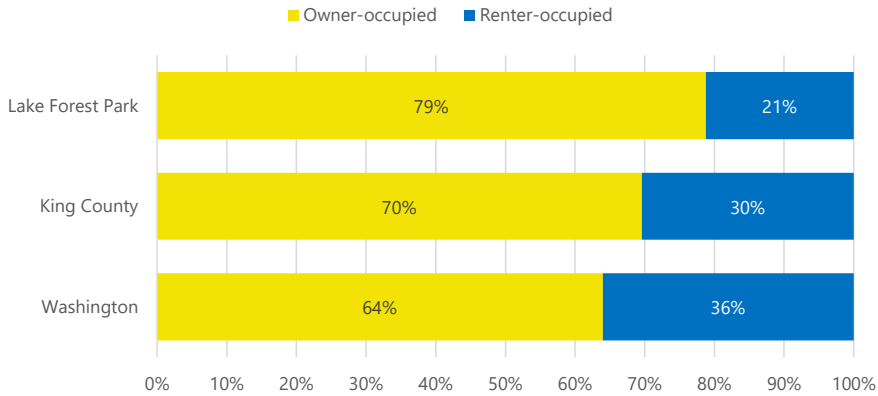
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More than three-quarters of Lake Forest Park households are homeowners, a larger share than King County and the state overall, as shown below. This is consistent with current zoning in the city, in which 96 percent of the land is zoned for single-family residential development.

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Figure 10. Tenure in Lake Forest Park, 2021



Source: 2021 American Community Survey 5-Year Estimates, Table DP04

As Table II.3 shows, trends in Lake Forest Park over the period between 2000 and 2012 include:

- The number of households has remained relatively stable, increasing slightly from about 5,000 to about 5,100 households.
- Average household size for owner-occupied units has decreased from 2.64 to 2.55 persons per household. For renter-occupied units, the average household size has remained stable at about two persons per household.
- The proportion of households with children under age 18 has decreased and with adults age 65 and over has increased.

The proportion of non-family households has increased, with a corresponding decrease in family households. As part of this change, the proportion of single-family households has increased.

Figure 11 below shows selected changes over the past two decades in Lake Forest Park's households. Household size has been relatively constant for homeowners, but renter households have increased in size, a trend seen nationally as increasing housing prices have caused more people to share housing. There are a smaller share of households with children and a larger share of older households in the city, which reflects the age trends discussed earlier in this report. Additionally, the share of single-person households has also risen over time, also reflective of the aging of Lake Forest Park's population as well as implying the future need for smaller housing units in the city.

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**Figure 11. Selected Household Trends in Lake Forest Park, 2000-2021**

	2000	2012	2021
<b>Total Households</b>	5,029	5,087	5,308
<b>Average Household Size: Owner-Occupied Units</b>	2.64	2.55	2.65
<b>Average Household Size: Renter-Occupied Units</b>	1.99	2.01	2.12
<b>Family Households with One or More Persons Under 18</b>	32%	28%	29%
<b>Households with One or More Persons 65 or Older</b>	23%	26%	30%
<b>Family Households</b>	72%	66%	69%
<b>Non-Family Households</b>	28%	34%	31%
<b>Single Person Households</b>	21%	27%	24%
<b>Single Person Households, Age 65 or Over</b>	6%	9%	7%

Source: 2021 American Community Survey 5-Year Estimates, Tables DP04, S2501, and S1101

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**Table II.3 Selected household characteristics in 2000 and 2012 in Lake Forest Park**

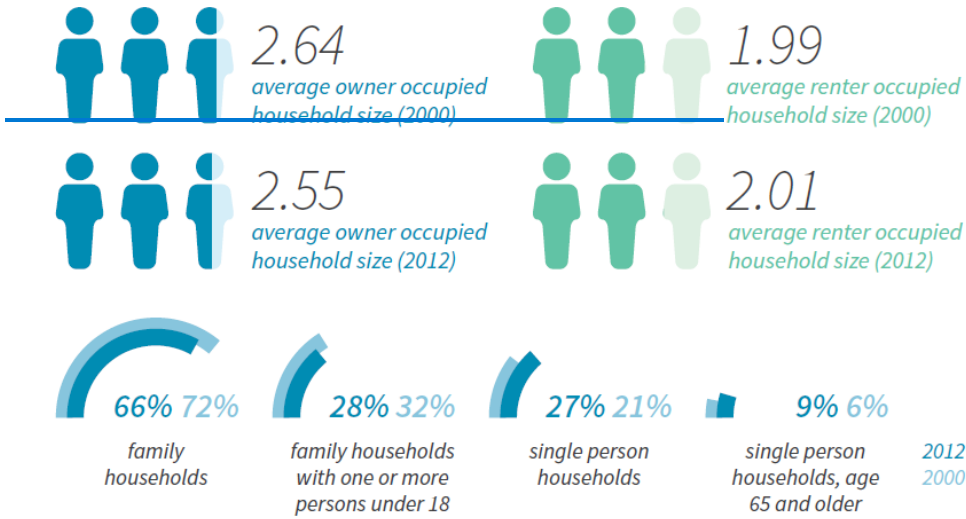
Household Characteristics	2000	2012
Total Households	5,029	5,087
Average Household Size: Owner Occupied Housing	2.64	2.55
Average Household Size: Renter Occupied Housing	1.99	2.01
Family Households With One or More Persons Under 18	32%	28%
Households With One or More Persons 65 And Older	23%	26%
Family Households*	72%	66%
Non-Family Households*	28%	34%
Single Person Households	21%	27%
Single Person Households, Age 65 and Older	6%	9%

\* Family households are households maintained by two or more persons residing together and related by birth, marriage, or adoption. Non-family households are defined as households maintained by a person living alone or with non-relatives only.

Source: U.S. Census Bureau, 2000 Decennial Census and 2012 5-Year American Community Survey.



Figure II.6 Infographics of selected household characteristics in 2000 and 2012 in Lake Forest Park



Lake Forest Park continues to be a city where families make up the majority of the households and households with children make up over a quarter of all households. Within the 20-year timeframe of the Comprehensive Plan, significant housing demand for families and households with children will likely continue. Characteristics that are often identified as making cities friendly to families include affordable housing, high public safety, available job opportunities, good schools, and good access to parks and recreation activities.

In the longer term, if demographic change in Lake Forest Park continues in the current direction, there will likely be increasing demand for housing stock and services to meet the needs of smaller families, including single parent families and single person head of households. Demand for housing and services that meet the needs of older residents may also increase.

**Household income.** Household incomes in Lake Forest Park are higher than county and statewide averages, with the 2021 median household income as reported by the Census at \$139,881, about 1.3 times higher than King County. This represents a 47 percent increase since the 2010 Census. Countywide, the median income increased 56 percent between 2010 and 2021.

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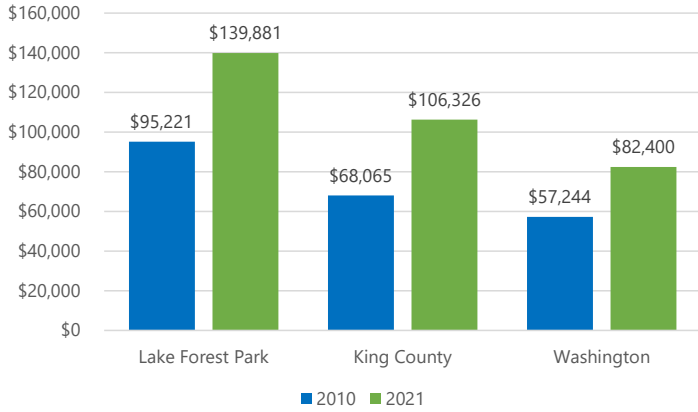
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Figure 12. Lake Forest Park Median Household Income, 2010-2021



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Source: US Census Bureau, 5-Year American Community Survey (Table S1501)

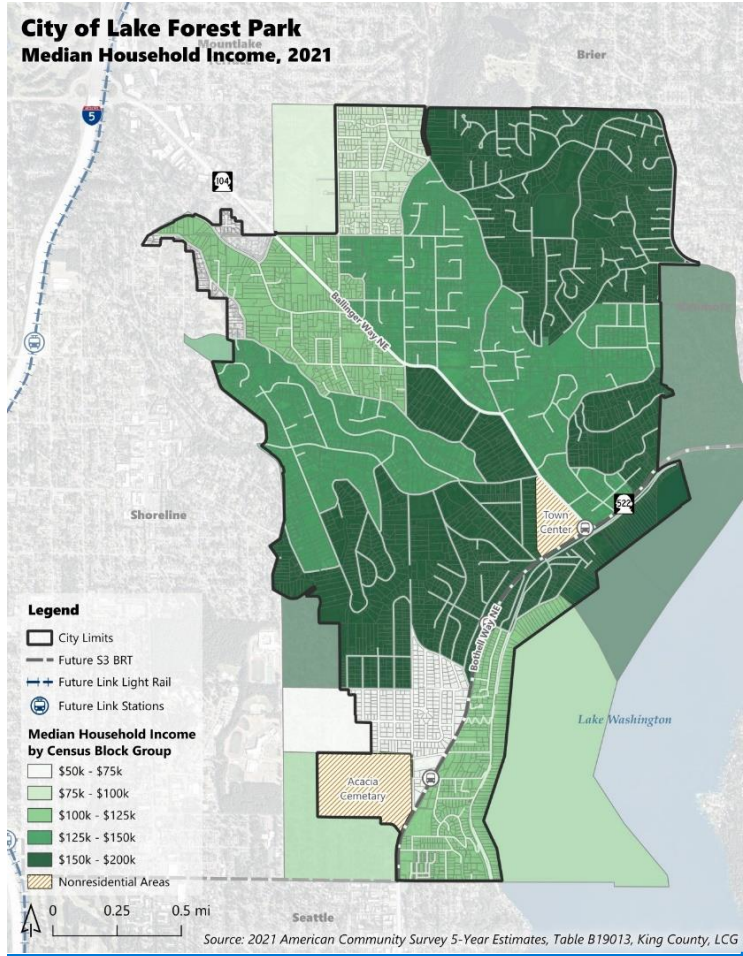
Household incomes in Lake Forest Park are not distributed evenly. Many of the lower-income households are in Census Block Groups near the Southern Gateway and in the NW of the city.

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Figure 13. Household Incomes by Census Block Group in Lake Forest Park, 2021



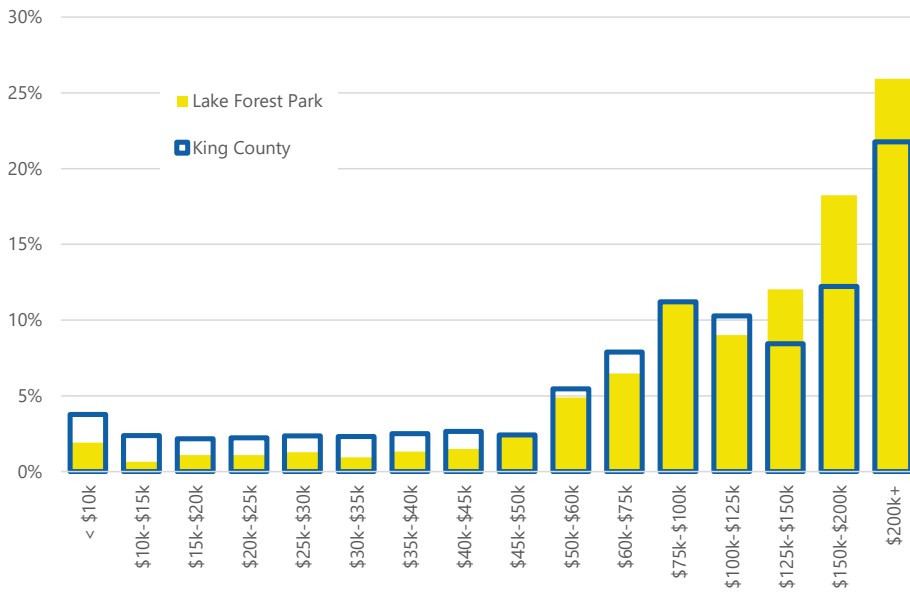
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The chart below in Figure 14 shows the breakdown of household incomes in Lake Forest Park by income bands, compared with King County. There are a significantly larger share of households earning over \$125,000 in the city when compared with the county, and smaller shares earning under \$45,000. In the \$50,000 - \$125,000 range, the share of households in the city is relatively similar to that seen countywide.

An analysis of household income required to afford housing at various price points is found later in this report, under "Housing Market Conditions."

Figure 14. Household Income Bands in Lake Forest Park and King County, 2021



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Source: 2021 American Community Survey 5-Year Estimates, Table B19001

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As shown previously in Figure 10, about 20 percent of Lake Forest Park households are renters. Compared with homeowners, renters can face greater housing challenges from circumstances beyond their control such as rent increases and evictions. Both nationally and in Lake Forest Park, renters are more likely to be lower-income and more diverse. Roughly 30 percent of Lake Forest Park rental households earn 100 of the Area Median Income or higher, compared to three-quarters of homeowner households, as shown below in Figure 15.

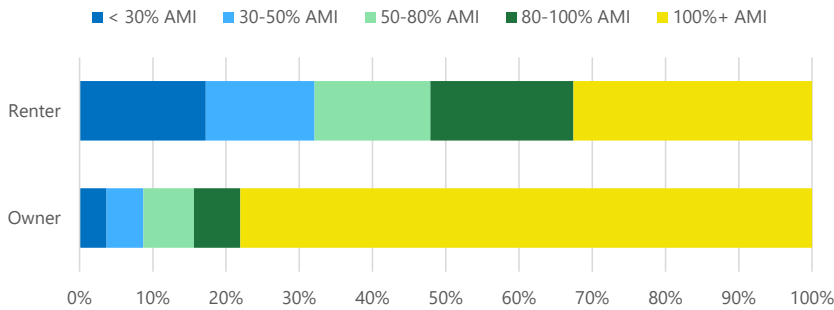
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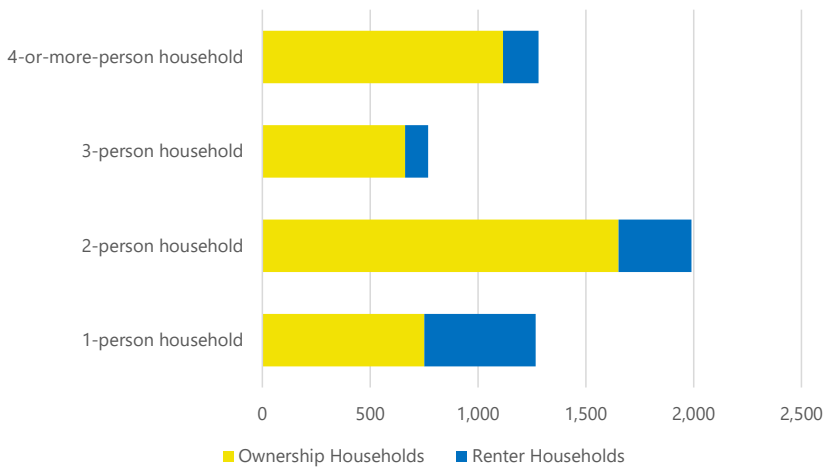
Figure 15. Income by Tenure in Lake Forest Park, 2020



Source: 2020 HUD Comprehensive Housing Affordability Strategy (CHAS)

Renters also tend to have smaller household sizes in the city, as shown in Figure 16. About 40 percent of renter households are one-person households. When planning for housing needs in the city, this data shows that renters in the city have a much more acute need for affordable rents and are more likely to need smaller units. It also shows the challenges renters may face moving from renting to home ownership in the city, which will be further discussed below under "Affordability."

Figure 16. Lake Forest Park Household Size by Tenure, 2021



Source: 2021 American Community Survey 5-Year Estimates, Table DP04

As noted previously, Lake Forest Park residents are older than regional and statewide averages. This can introduce compounding challenges to housing affordability. As shown in Figure 17, older households earn considerably less than younger households in Lake Forest Park. Nonetheless, most older

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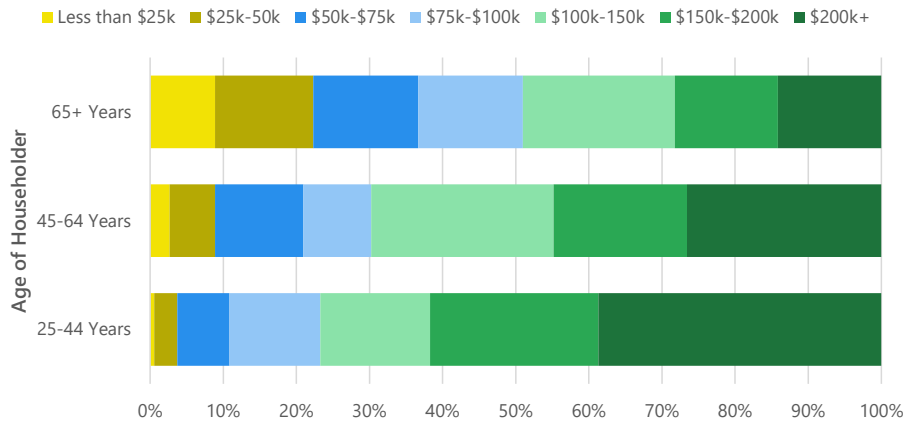
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households are homeowners, as shown in Figure 18. Given the rising housing prices in the city discussed further under “Housing Market Conditions” later in this report, these households would likely be unable to afford their current housing units if they had to buy them today and may also face challenges if they need or wish to move and stay within the community.

Figure 17. Age and Household Income in Lake Forest Park, 2021

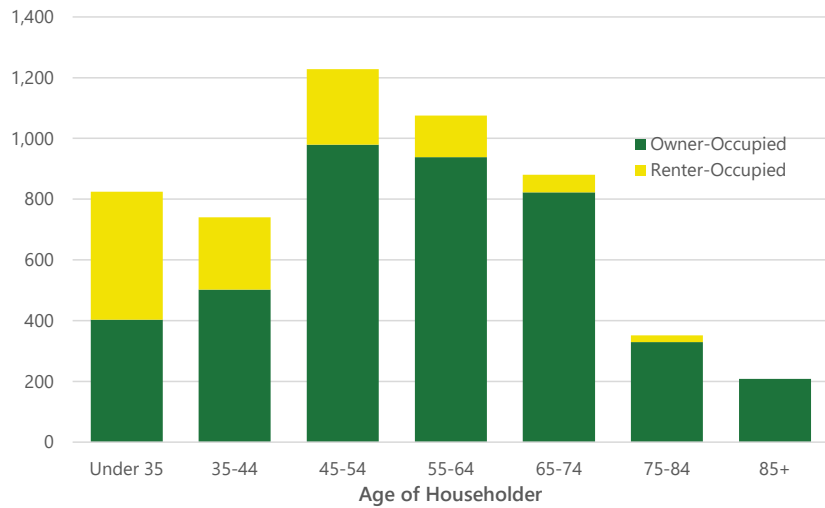


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Source: 2021 American Community Survey 5-Year Estimates, Table B19037

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Figure 18. Age and Tenure of Households in Lake Forest Park, 2021



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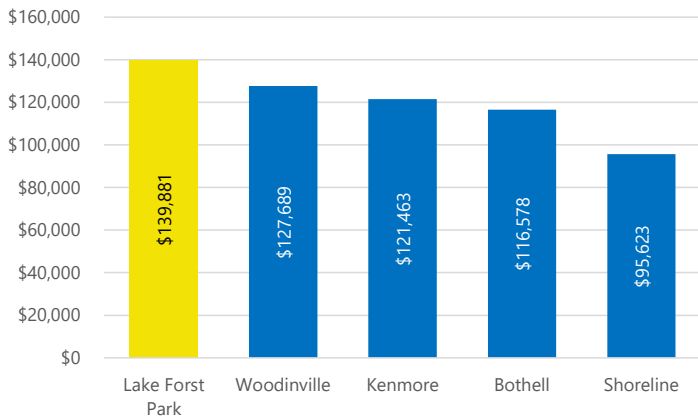
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Source: 2021 American Community Survey 5-Year Estimates, Table S2503

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Figure II.7 The chart below summarizes household income in Lake Forest Park and surrounding communities. As shown in Figure II.7, the median income in Lake Forest Park is higher and poverty rate lower, compared to nearby cities. This has remained consistent since the previous Comprehensive Plan in 2012, though as of 2021 the poverty rate is slightly lower in Woodinville than in Lake Forest Park.

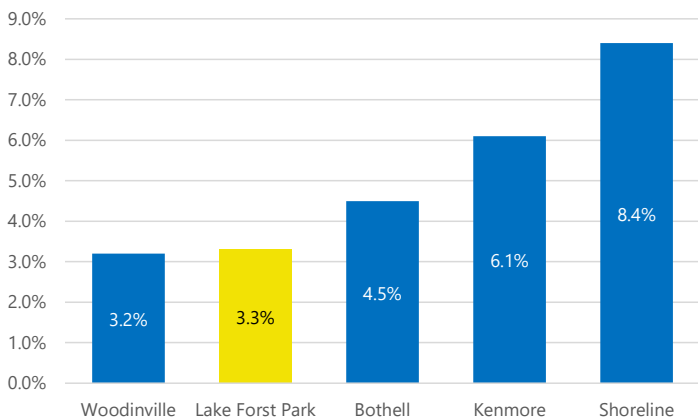
Figure 19. Median Household Income in Lake Forest Park and Comparison Communities, 2021



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Source: US Census Bureau, 2021 5-Year American Community Survey (Table S1901)

Figure 20. Percent of Households Below Poverty Level in Lake Forest Park and Comparison Communities, 2021



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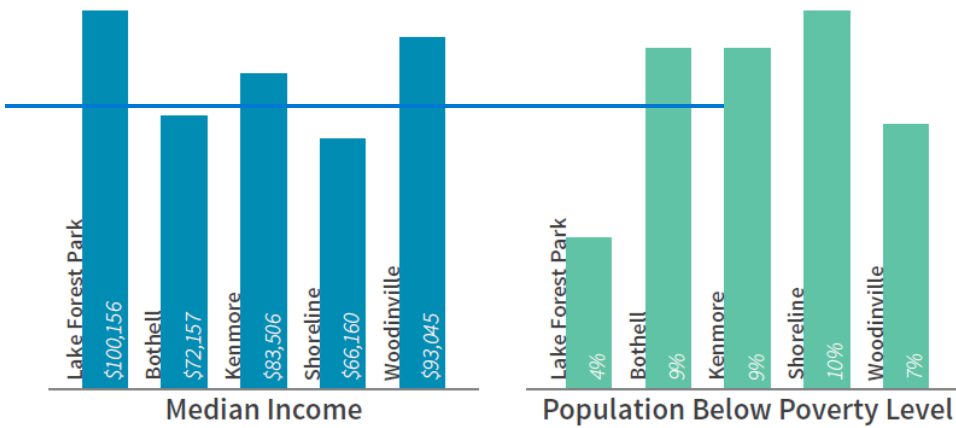
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Source: US Census Bureau, 2021 5-Year American Community Survey (Table S1701)

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Figure II.7 Household incomes in Lake Forest Park and comparison communities



Source: U.S. Census Bureau, 2012 5-Year American Community Survey.

**Cost Burden.** One metric used by HUD to determine housing challenges is “Cost Burden.” A household is considered cost-burdened if they spend more than 30 percent of their income on housing costs (including rent or mortgage and utilities). A severely cost-burdened household spends more than 50 percent of their income on housing costs. Although there are a number of measures for affordability, 30 percent of gross annual household income is generally used as a rule of thumb for the amount that a household could spend and still have enough left over for other nondiscretionary spending. Households that spend more than this are typically considered cost-burdened. Over a third of Lake Forest Park households that own homes and have a mortgage are cost-burdened, as are nearly half of households that rent. When housing costs exceed this threshold of affordability, households may be forced to trade-off the cost of housing with other nondiscretionary needs, such as health care, child care, and others.

The most recent available data on cost burden is from HUD’s 2020 Comprehensive Housing Affordability Strategy (CHAS) dataset. Overall, nearly a quarter of households in Lake Forest Park are cost burdened. Renters experience significantly higher rates of cost burden, with 31 percent of renters spending between 30 and 50 percent of their income on housing costs and another 16 percent spending more than half their income on housing costs, as shown in

Figure 21.

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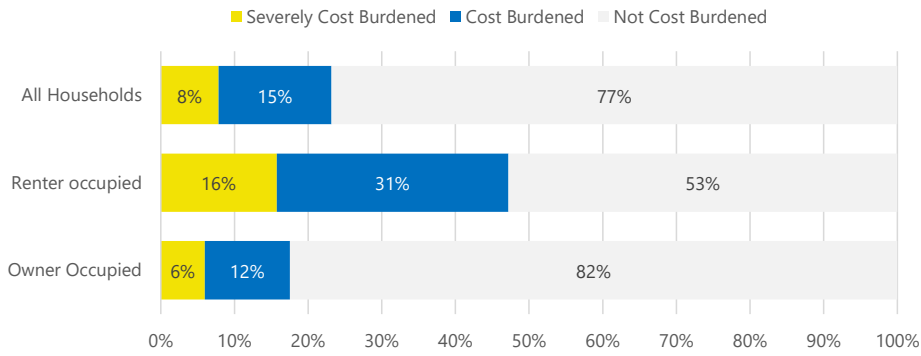
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Figure 21. Cost-Burdened Households by Tenure in Lake Forest Park, 2020



Source: 2020 HUD Comprehensive Housing Affordability Strategy (CHAS).

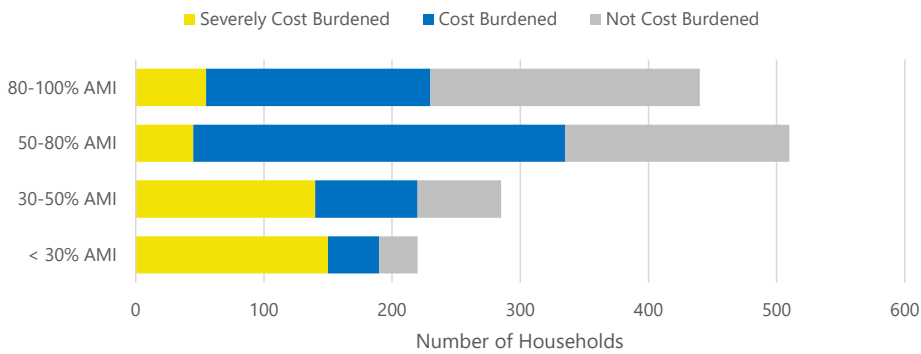
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Figure 22 The lower chart shows cost burden by household income. Two-thirds of Lake Forest Park's extremely low-income households, or 150 households, are spending more than half their income on housing costs. However, over half of lower- and middle-income households are also spending at least 30 percent of their income on housing.

Overall, this data shows a need for more affordable units in the city, particularly for renters and lower-income households.

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Figure 22. Cost-Burdened Households by Income in Lake Forest Park, 2020



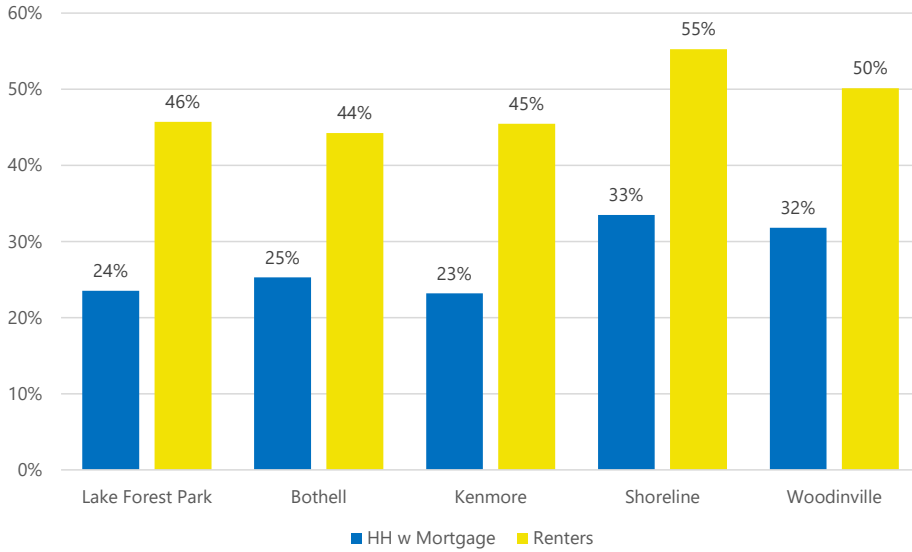
Source: 2020 HUD Comprehensive Affordability Strategy (CHAS).

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Compared with neighboring cities, Lake Forest Park has similar rates of cost burden as Bothell and Kenmore. Among owner households with a mortgage, 24 percent spend more than 30 percent of their gross annual income on rent. Among renters, 46 percent are cost burdened.

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Figure 23. Rent Burden for Renters and Owner-Occupied Households with Mortgages, 2021

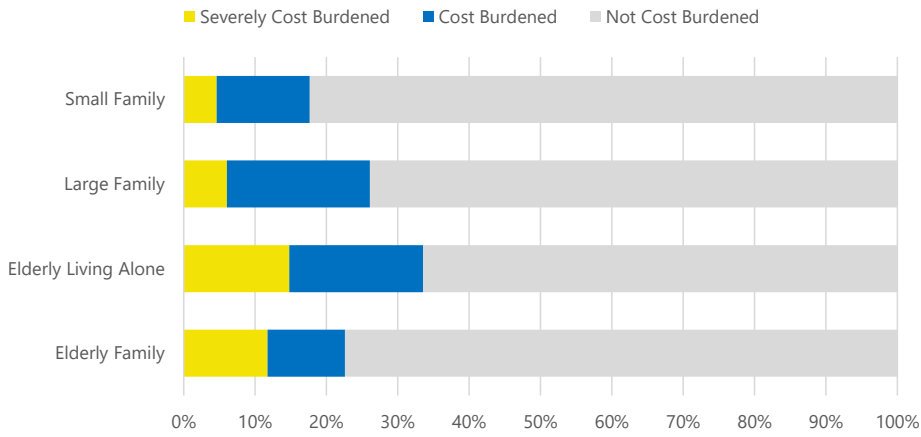


Source: US Census 2021 American Community Survey 5 Year Estimates (Tables S2503, B25074).

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HUD also breaks down cost burden by a variety of other metrics, including household type in several categories, as shown at right below in Figure 24. This data reinforces some of the data on age and income discussed earlier in this report, since “Elderly Families” overall have higher rates of severe cost-burden than other family types. Furthermore, about a third of older residents living alone are cost-burdened in Lake Forest Park. This data again shows the need for affordable, and potentially smaller units for the city’s older residents.

**Figure 24. Cost Burden by Household Type in Lake Forest Park, 2020**



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Source: 2020 HUD Comprehensive Affordability Strategy (CHAS).

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**Disability.** About 14 percent of the households in Lake Forest Park have one or more members with a disability, according to the most recently available HUD data shown below in Figure 25. at right. These numbers show households where any member has one of the limitations listed. Note that some residents may have more than one limitation, so the totals do not add up to 100 percent.

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When planning for housing, it is important to take into consideration households which may need accessible units or units without stairs. Additionally, this data shows the need for some assisted living facilities in the city.

**Figure 25. Disability in Lake Forest Park, 2020**

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Disability Status	Number of Households	Share of Households
Household member has a cognitive limitation	285	5%
Household member has a hearing or vision impairment	260	5%
Household member has a self-care or independent living limitation	325	6%
Household member has an ambulatory limitation	300	6%
Household member has none of the above limitations	4,520	86%

Source: 2020~~19~~ HUD Comprehensive Affordability Strategy (CHAS).

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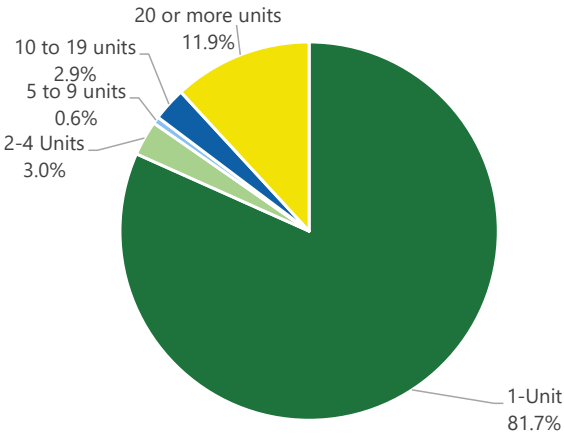
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## Where We Live

The following provides a brief overview of housing characteristics in Lake Forest Park, including inventory, ~~tenure, affordability, market and trends, affordability, and~~ special needs housing.

**Inventory.** Lake Forest Park’s housing inventory reflects the City’s history as a low density residential community. Most of Lake Forest Park’s housing units are single-family homes, at 82 percent, compared to 52 percent across King County and 63 percent statewide. About 4 percent of units in the city are “Middle Housing” units of between 2 and 9 units, and the remaining 15 percent are in apartment buildings of 10 units or more. As discussed previously, a lack of diversity of housing types can present barriers to housing for some segments of the population.

**Figure 26. Housing Unit Type in Lake Forest Park, 2021**



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Source: 2021 American Community Survey 5 Year Estimates (Table DP04)

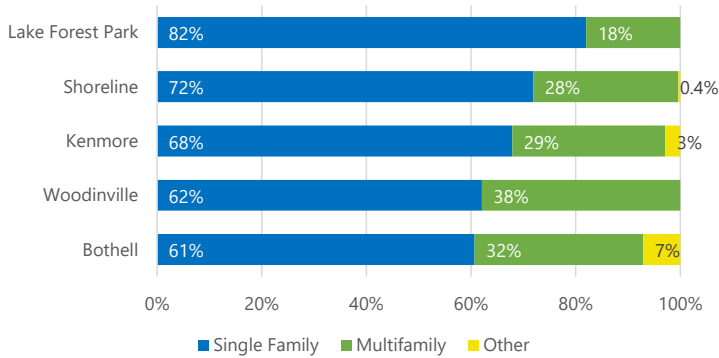
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As show in Figure II.8, single family residential houses are the predominant housing type, comprising roughly 87 percent of the city's housing units. Comparatively, the City's neighbors are also characterized primarily by single family residential development, although to a notably lesser degree; at 72 percent single family housing, the City of Shoreline is most similar to the mix of housing types in Lake Forest Park. ~~Single family residential houses are the predominant housing type, comprising roughly percent of the city's occupied housing units. When compared with neighboring communities, Lake Forest Park has the highest share of single-family homes, at 82 percent, as shown below in Figure 27. Comparatively, while this is a higher percentage than neighboring communities. Although this is higher than other cities, the regional market is dominated by single family homes.~~

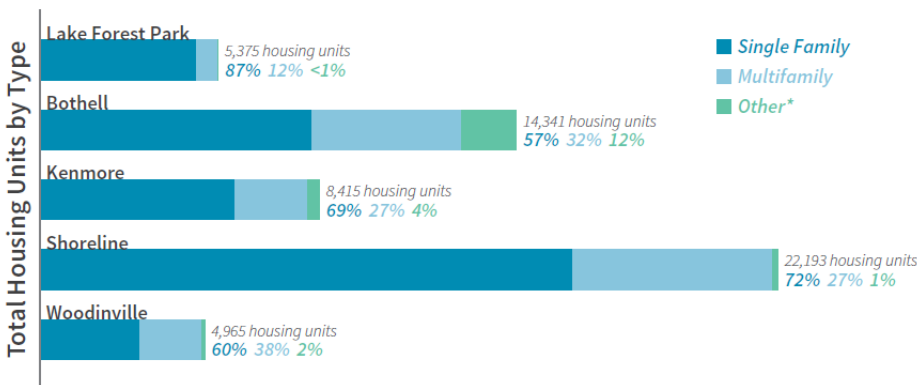
Figure 27. Occupied Housing Types in Lake Forest Park with Comparison Communities, 2021



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Source: 2021 American Community Survey 5 Year Estimates (Table S2504).

Figure II.8 Housing types in Lake Forest Park and comparison cities



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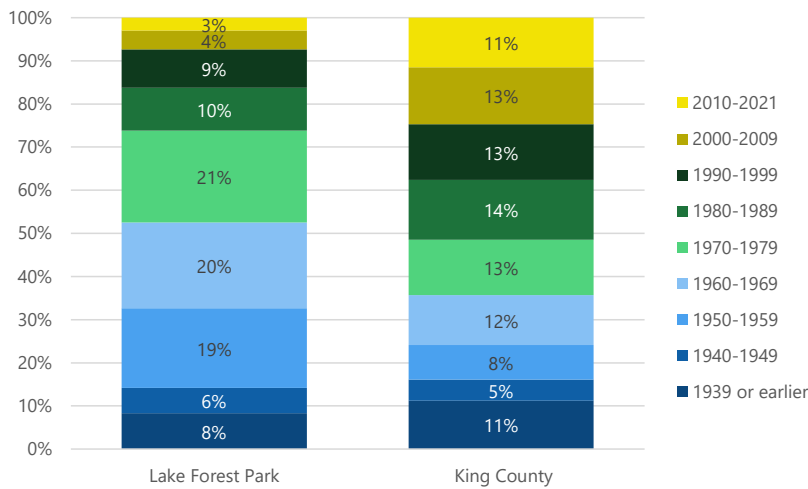
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\* Includes mobile homes, boat, recreational vehicle, vans.

Source: U.S. Census Bureau, 2012 5-Year American Community Survey.

Housing in Lake Forest Park was predominantly built between 1950 and 1980, with very little production since the 1980s compared with King County as a whole, as shown below. A lack of sufficient production to keep up with housing demand can hamper housing affordability, as discussed subsequently in this report.

Figure 28. Year Housing Built in Lake Forest Park, 2021



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Source: 2021 American Community Survey 5 Year Estimates (Table DP04).

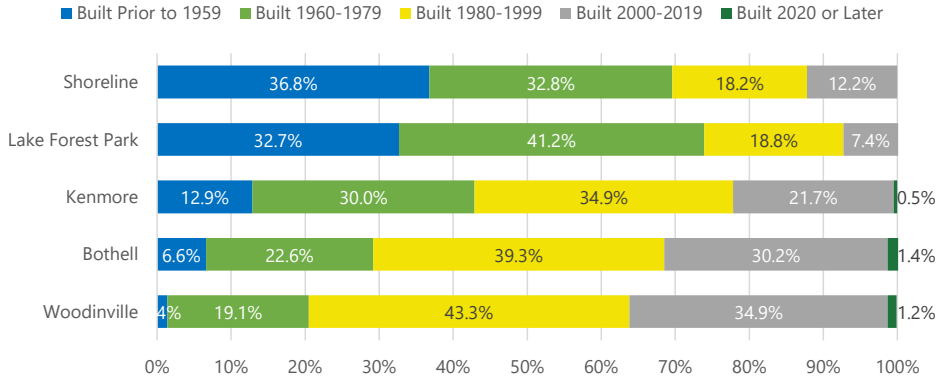
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As shown in Figure II.9, the age of Lake Forest Park's housing stock is also relatively more similar to the City of Shoreline housing inventory than the other surrounding cities, all of which have a comparatively younger housing inventory.

As in 2012, the age of Lake Forest Park's housing stock is more similar to the city of Shoreline's compared with other neighboring jurisdictions. Neither Lake Forest Park nor Shoreline added new housing units between 2020 and 2021. Just under one third of Lake Forest Park's housing was built before 1960 and an additional 41 percent was built between 1960 and 1979. In Woodinville, over three quarters of housing units were built in 1980 or later.

In some communities, the presence of a relatively large inventory of older housing may be associated with lower prices and increased affordability. However, in the case of Lake Forest Park, housing values have remained strong (see Table II.4). This is likely due to a number of factors, including the unique natural setting, proximity to employment centers, construction quality, school district reputation, and others. Over time, the demand for housing in Lake Forest Park has remained strong while supply has failed to keep up with the increase in regional population.

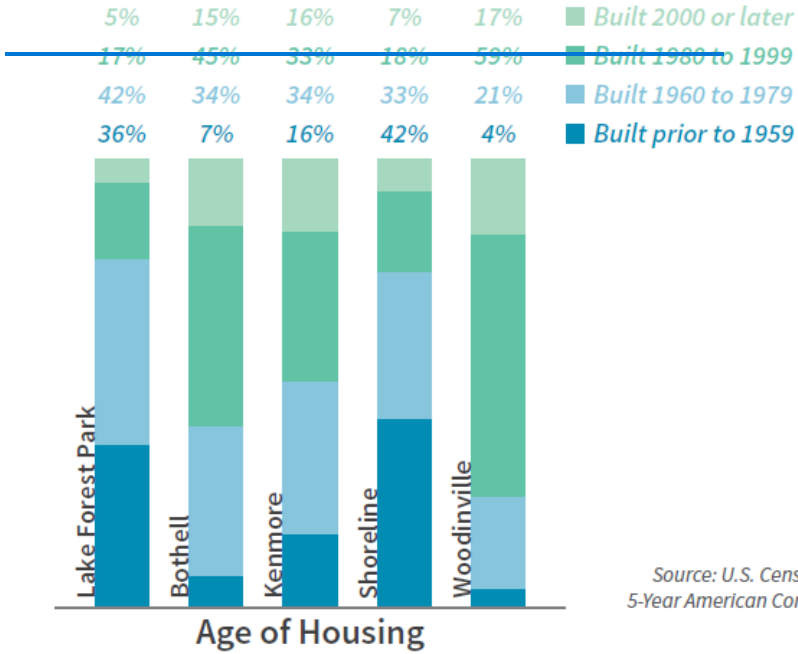
Figure 29. Age of Housing in Lake Forest Park and Comparison Communities, 2021



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Source: 2021 American Community Survey 5 Year Estimates (Table DP04).

Figure II.9 Year structure built in Lake Forest Park and comparison cities



Source: U.S. Census Bureau, 2012 5-Year American Community Survey.

**Housing Tenure Value.** As shown in Table II.4 and Figure II.10 on the following page, As was the case in 2012, as of 2021 Lake Forest Park has a high proportion of property owners to renters compared to surrounding communities. The city also has comparatively high home values. Although the city has significantly fewer rental units compared to surrounding communities, rental rates are comparable with the surrounding communities.

**Figure 30. Tenure and Housing Value in Lake Forest Park with Comparison Communities, 2021**

	Lake Forest Park	Bothell	Kenmore	Shoreline	Woodinville
<b>Median Home Value</b>	\$746,400	\$638,000	\$656,200	\$627,500	\$770,800
<b>Total Occupied Units</b>	5,308	18,371	9,266	22,510	5,527
<b>Percent Owner Occupied</b>	78.8%	64.8%	69.6%	67.1%	61.4%
<b>Percent Renter Occupied</b>	21.2%	35.2%	30.4%	32.9%	38.6%
<b>Median Rent</b>	\$1,839	\$1,956	\$1,704	\$1,730	\$2,097

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Source: 2021 American Community Survey 5 Year Estimates (Table DP04).

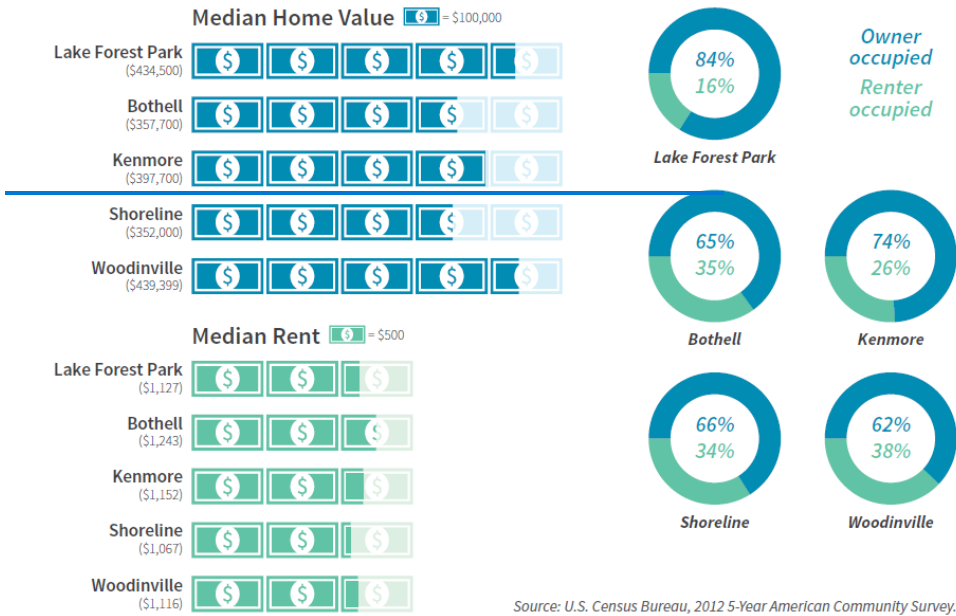
**Table II.4 Tenure and housing costs in Lake Forest Park and comparison cities**

	Lake Forest Park	Bothell	Kenmore	Shoreline	Woodinville
<b>Median Home Value</b>	\$434,500	\$357,700	\$397,700	\$352,000	\$439,399
<b>Total Occupied Units</b>	5,087	13,677	7,867	21,218	4,561
<b>Percent Owner Occupied</b>	84%	65%	74%	66%	62%
<b>Percent Renter Occupied</b>	16%	35%	26%	34%	38%
<b>Median Rent</b>	\$1,127	\$1,243	\$1,152	\$1,067	\$1,116

Source: U.S. Census Bureau, 2012 5-Year American Community Survey.



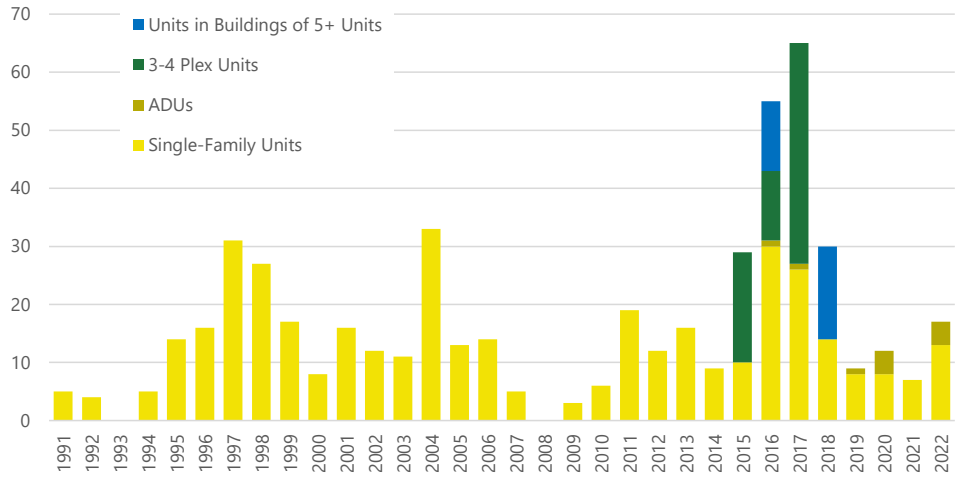
Figure II.10 Infographics of tenure and housing costs in Lake Forest Park and comparison cities



**Housing Development Trends.** Single-family housing production in Lake Forest Park has followed prevailing economic trends over the past few decades, as shown [herebelow in Figure 31](#). About 15-30 units per year were permitted in from the mid-1990s until the 2008 recession. After the economy recovered, single-family development resumed a similar pace with the addition of some multifamily, triplex and four-plex construction in 2015-2018.

The city has not seen any new multifamily projects permitted since 2018 and a lower rate of single-family construction in the past five years as well. There has been a slight uptick in ADU permitting in recent years, with several units permitted in 2020 and 2022, and additional ADU allowances adopted by the council in 2022 ~~as well~~.

Figure 31. Housing Permits Issued in Lake Forest Park, 1992-2022

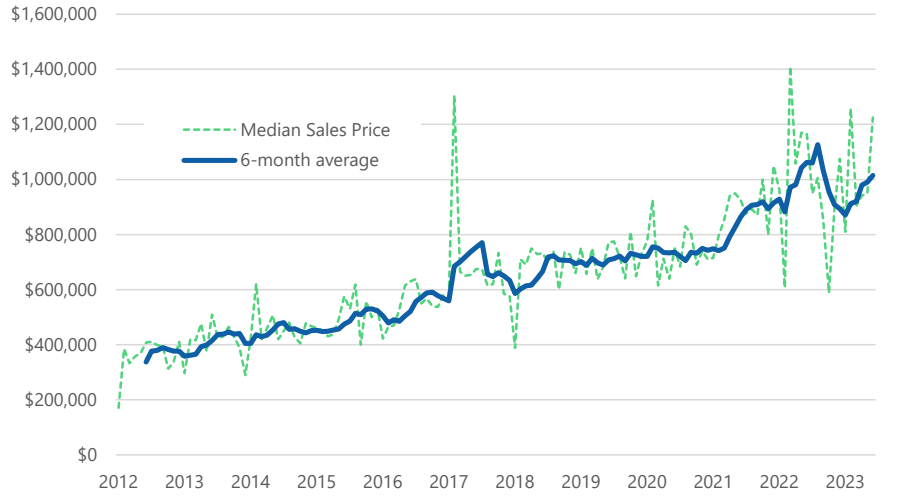


Source: US Census Building Permits Survey.

**Home Sales.** Sales prices in Lake Forest Park have been rising steadily over the past decade from around \$400,000 in 2012 to around \$1,000,000 in mid-2023, an increase of 150 percent, as shown below at left in Figure 32. As with many suburban municipalities, housing prices rose rapidly immediately following the onset of the COVID-19 pandemic, though they subsided slightly as the housing market cooled in 2022. However, in 2023 prices have been slowly rising again.

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Figure 32. Lake Forest Park Median Home Sales Prices, 2012-2023



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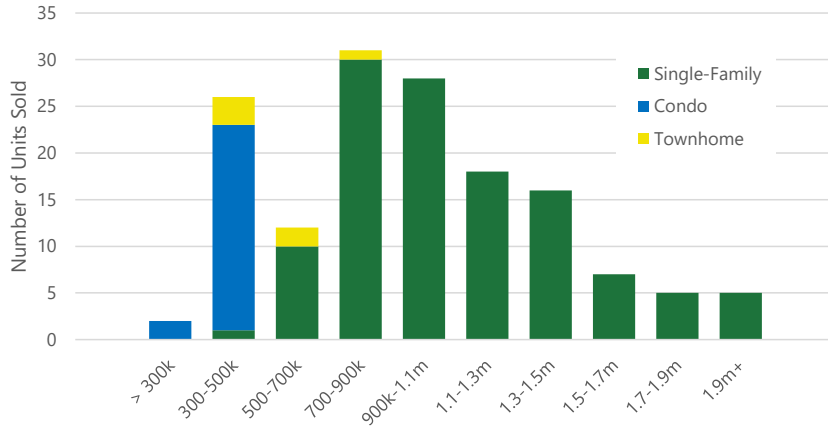
Source: Redfin.

The chart below shows the breakdown of sales prices for homes sold in Lake Forest Park between 2022 and 2023. Most single-family homes sold were relatively close to the median sales price of \$1 million, although there were several sales in excess of \$2 million and very few houses sold for under \$700,000. On the other hand, condos and townhomes sold in the past year were considerably less expensive, with most condos selling for between \$300,000 and \$500,000, and townhomes averaging slightly higher. This shows the value to potential homebuyers which can be achieved through increased density of development in ownership housing.

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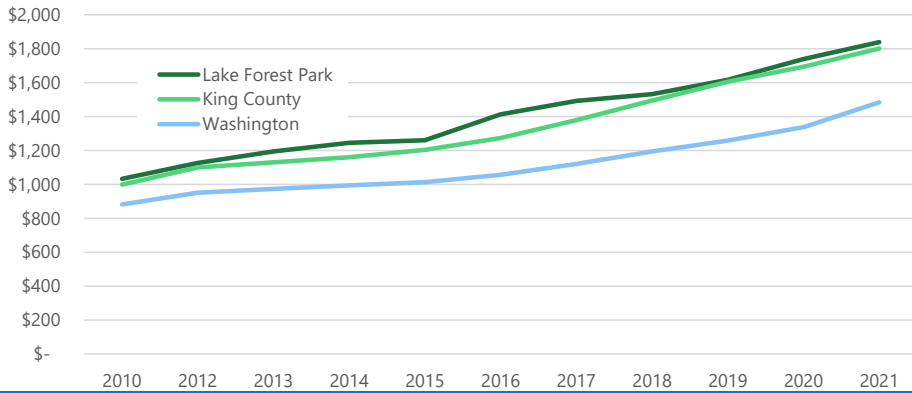
Figure 33. Lake Forest Park Home Sales by Price and Type, July 2022-July 2023



Source: Redfin.

Rental Market Trends. Rents in Lake Forest Park have also been increasing over the past decade, as reported by the Census. The median rent in 2021 was \$1,839, just above the King County average of \$1,801. This is significantly higher than the statewide rent average. Rent prices are more difficult to track than housing sales prices and Census rent data often underestimates or lags behind the market reality. Costar, a national commercial real estate data provider, estimates current average rents in Lake Forest Park at \$1,993 as of mid-2023. Overall, the Census data does show a general picture of increasing rents in the city and region.

Figure 34. Median Gross Rent in Lake Forest Park, 2011-2021



Source: US Census 2021 American Community Survey 5 Year Estimates (Table DP03).

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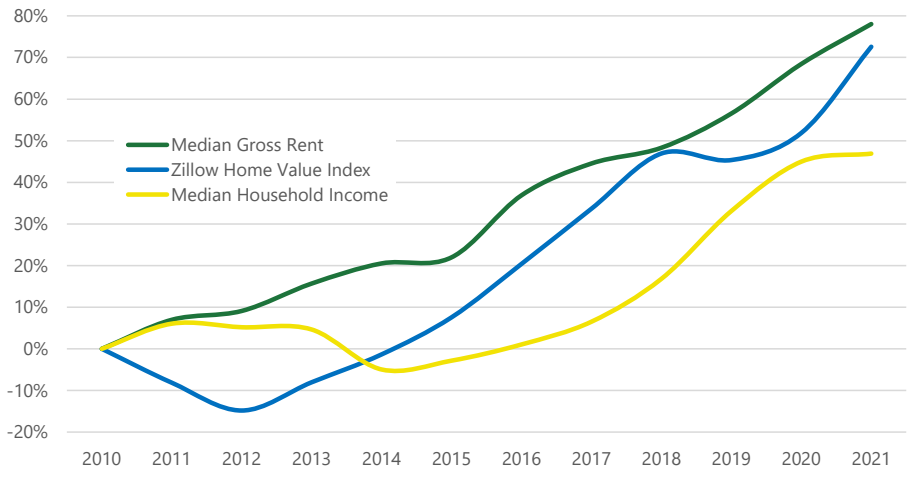
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The chart below shows the change in rent and home values compared with the change in household income in Lake Forest Park over the past decade. Although home prices and incomes were relatively stable in the first half of the 2010s, both have increased significantly in recent years, with home prices and rental prices outpacing income growth overall.

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Figure 35. Change in Rent, Home Value, and Income in Lake Forest Park, 2010-2021

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Source: US Census 2021 American Community Survey 5 Year Estimates (Tables S2503, DPO3); Zillow.

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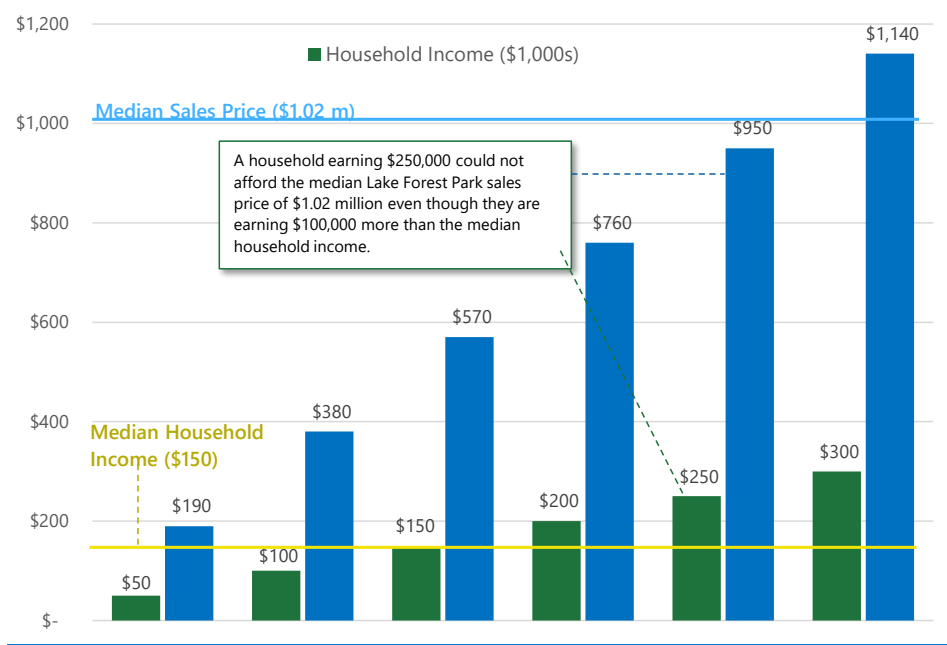
**Housing Affordability.** Although there are a number of measures for affordability, 30 percent of gross annual household income is generally used as a rule of thumb for the amount that a household could spend and still have enough left over for other nondiscretionary spending. Households that spend more than this are typically considered cost burdened. Over a third of Lake Forest Park households that own homes and have a mortgage are cost burdened, as are nearly half of households that rent. When housing costs exceed this threshold of affordability, households may be forced to trade off the cost of housing with other nondiscretionary needs, such as health care, child care, and others.

The chart below shows the price of housing that would be affordable to various Lake Forest Park households based on their income, using the average 2023 year-to-date sales price from Redfin, Freddie Mac mortgage interest rates as of August 2023, and 2023 income estimates from ESRI, a global provider of Geographic Information Systems data.

A household earning the median income of \$150,000 could afford a home worth about \$570,000, whereas the median home sales price in the city is \$445,000 higher, at \$1.02 million. Or, to put it another way, the median household would need to earn \$117,000 more in order to afford the median home price.

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Figure 36. Housing Affordability in Lake Forest Park, 2023



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Source: Esri; Redfin; Freddie Mac; Leland Consulting Group.

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~~A household earning the median income of \$150,000 could afford a home worth about \$570,000, whereas the median home sales price in the city is \$445,000 higher, at \$1.02 million. Or, to put it another way, the median household would need to earn \$117,000 more in order to afford the median home price.~~

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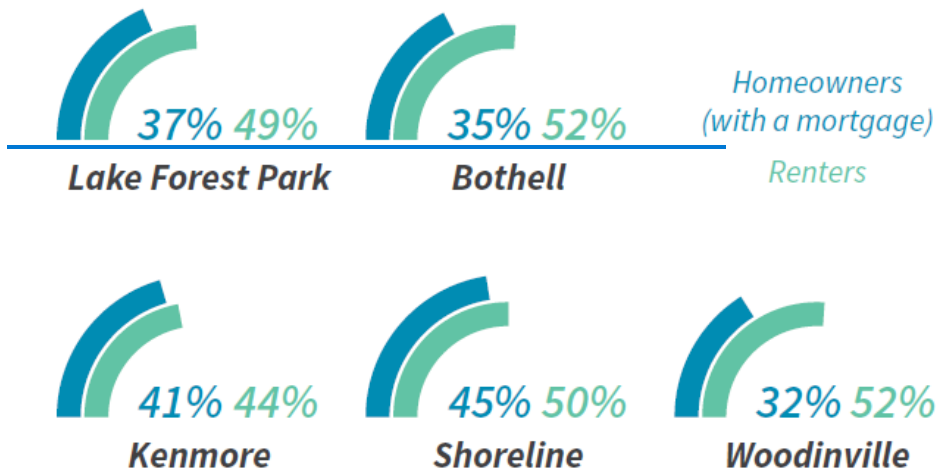
Comparing this data with the breakdown of household incomes shown earlier in this report, less than 25 percent of Lake Forest Park households would be able to afford the median home in the city as of this year. On the other hand, the types of housing which would be affordable to households earning the median income – housing priced around the \$500,000 mark – is condominium or townhome units, based on sales prices from the past year in Lake Forest Park shown previously.

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As the city plans for future housing needs, this gap between incomes and housing prices will need to be carefully considered to ensure the availability of housing to a wider range of current and future residents of Lake Forest Park.

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**Figure II.11** Cost-burdened households\* in Lake Forest Park and comparison cities



\* Cost-burdened households are those paying 30 percent or more of their income for housing.

Source: U.S. Census Bureau, 2012 5-Year American Community Survey.

**Special Needs Housing.** In Lake Forest Park, the Woodland North apartments are part of the King County Housing Authority’s moderate income housing program. The development contains 105 units, comprised of a mix of studio, one-bedroom and two-bedroom apartments. The Housing Authority’s moderate income program is for people who can pay rent closer to market rates. Tenants pay a flat rent amount each month instead of a percentage of income. Three adult family homes, providing a total of 18 units and including a mix of assisted living and Alzheimer’s memory care services, are located in Lake Forest Park.

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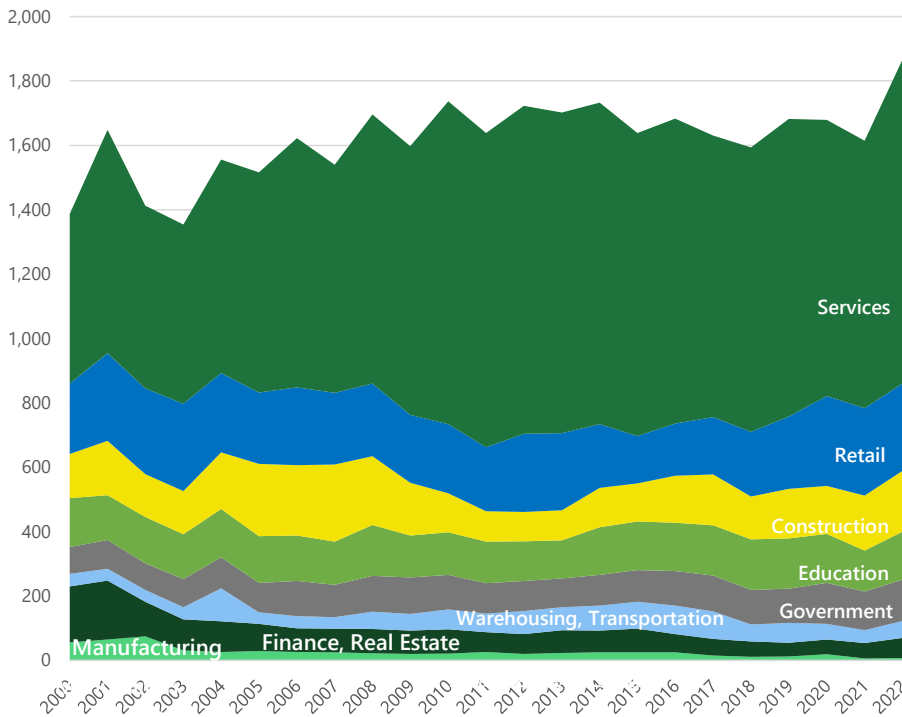
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## Where We Work

**Employment.** Lake Forest Park is primarily a residential community with little commercial development or activity outside of the Town Center and Southern Gateway. In 2022, the jobs-to-housing ratio was 0.34, compared to the King County average of 1.34.

Overall, Lake Forest Park’s employment numbers have been steady over the past two decades as shown here, and the breakdown by sector has also been consistent, particularly over the past decade. The services sector accounts for the largest share of jobs, and has seen a small spike post-pandemic, up to 1,006 jobs in 2022. The retail sector is the city’s second largest, and construction, education, and government each employ around 150 people in the city. There are much smaller numbers of jobs in warehousing and transportation, finance, and manufacturing.

Figure 37. Employment by Sector in Lake Forest Park, 2000-2022



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Source: Puget Sound Regional Council (PSRC) Covered Employment Estimates.

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**Workforce Housing Affordability.** Lake Forest Park’s top job sectors shown previously are generally sectors with relatively low wages. This chart shows the latest wages for retail workers, construction workers, teachers, and an average of a variety of service industry jobs in the Seattle Metro region as of

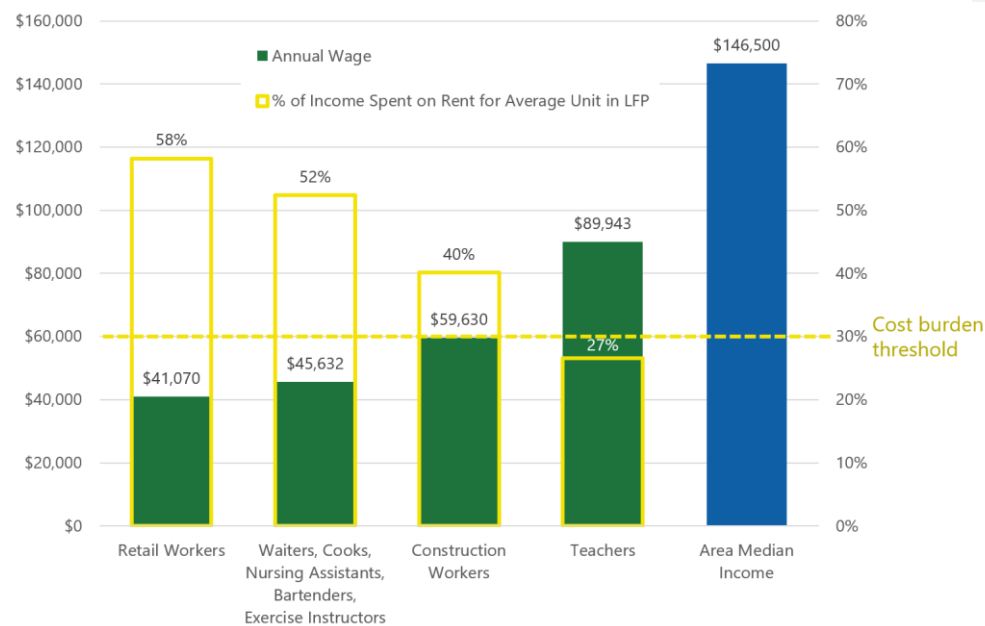


2023. All of these jobs, but particularly those in services and retail, are paying substantially lower wages than the Lake Forest Park median income. When compared with the most recent rent data in the city from CoStar, employees in all of these sectors (except teachers) would be cost-burdened, spending more than 30, or in some cases, more than 50 percent of their income to afford the average rents in the city, as shown in the yellow boxes to the right.

From the perspective of ownership housing, only teachers would be able to afford any of the units which sold in the city over the past year, and then only at the price points of some condominium or townhome units, around \$350,000.

This shows that Lake Forest Park is essentially unaffordable to the majority of employees in its main employment sectors, particularly in a single-income household. If the city wishes to provide housing for its service and retail employees, reduce commuting, and provide more housing choice for workers in the city, more affordable units and smaller units will need to be developed in the city in the coming decades.

Figure 38. Wages and Housing Costs for Top Employment Sectors in Lake Forest Park, 2023

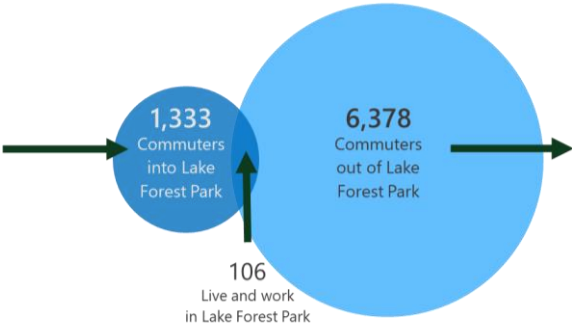


Source: Washington Employment Security Department; CoStar; LCG.

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Commuting Patterns. Most Lake Forest Park residents commute out to work, as shown above in Figure 39, from the most recently available Census commuting data. The heatmap at right in Figure 40 shows employment density in the city, with most jobs concentrated in the Town Center and Southern Gateway, as well as some commercial activity at Ballinger and 35<sup>th</sup>.

Figure 39. Commuting Patterns in Lake Forest Park, 2020

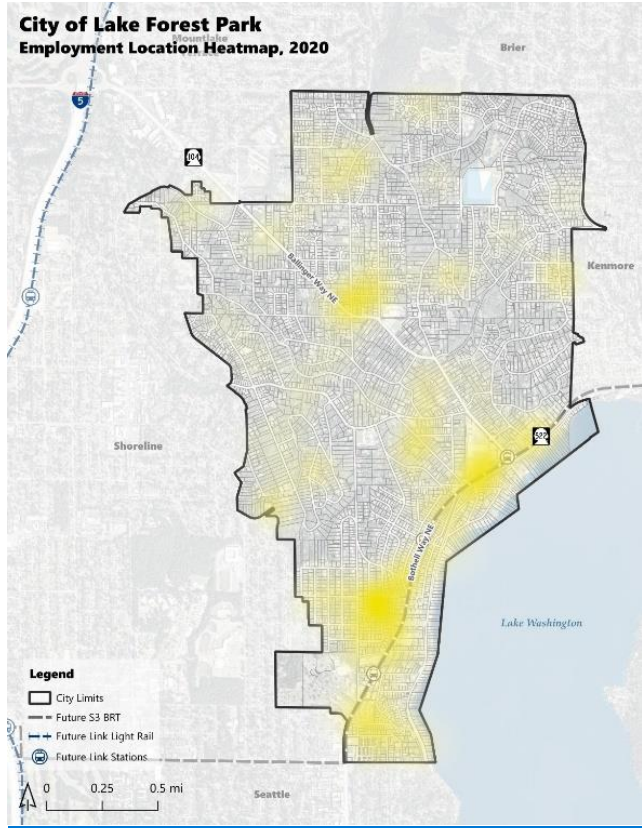


Source: U.S. Census Longitudinal Employer-Household Dynamics (LEHD) via Census OnTheMap

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Figure 40. Lake Forest Park Employment Location Heatmap, 2020



## Forecast of Future Needs

**Special Needs Housing.** Special needs housing helps to ensure that the needs of all community members are met. It can include low income housing, financially assisted housing, group quarters, and transitional housing. As discussed previously, within the 20-year time-frame of the plan, a large portion of the demand for housing will likely continue to be from families and households with children. Longer term, if demographic change in Lake Forest Park continues in the current direction, there will likely be increasing demand for housing stock and services to meet the needs of smaller families, including single parent families and single person head of households. Demand for housing and services that meet the needs of older residents may also increase.

Housing Element goals and policies in Volume I addressing special needs housing are found in Goal H-4.

**Affordable Housing.** The 2012 King County Countywide Planning Policies (CPPs) Appendix 4, Technical Housing Appendix, establishes a methodology for each jurisdiction to address countywide affordable housing need. The summary of the methodology is excerpted below:

- 1.—Moderate Income Housing Need.** Census Bureau estimates indicate that approximately 16 percent of households in King County have incomes between 50 and 80 percent of area median income; establishing the need for housing units affordable to these moderate income households at 16 percent of each jurisdiction's total housing supply.
- 2.—Low Income Housing Need.** Census Bureau estimates indicate that approximately 12 percent of households in King County have incomes between 30 and 50 percent of area median income; establishing the need for housing units affordable to these low income households at 12 percent of each jurisdiction's total housing supply.
- 3.—Very Low Income Housing Need.** Census Bureau estimates indicate that approximately 12 percent of households in King County have incomes between 0 and 30 percent of area median income; establishing the need for housing units affordable to these very low income households at 12 percent of each jurisdiction's total housing supply. This is where the greatest need exists, and should be a focus for all jurisdictions.

**Commented [AO4]:** Detailed forecast methodology and results will be provided in a separate methodology appendix

Table II.5 summarizes household income levels corresponding to 80, 50 and 30 percent of King County and City of Lake Forest Park median household incomes.

**Table II.5 City of Lake Forest Park and King County household income categories**

	Median Household Income	80% of Median Household Income	50% of Median Household Income	30% of Median Household Income
Lake Forest Park	\$99,637	\$79,710	\$49,819	\$29,891
King County	\$71,811	\$57,449	\$35,096	\$21,543

Source: U.S. Census Bureau, 2009–2013 5-Year American Community Survey.

Based on the guidance provided by the King County CPP Appendix 4 and the City’s housing target of 551 units, the future affordable housing need in Lake Forest Park can be projected as follows:

**Table II.6 City of Lake Forest affordable housing need by income**

Annual Household Income	Needed Affordable Households
\$21,543 or less	66
\$21,543–\$35,906	66
\$35,906–\$57,449	88

Housing Element goals and policies in Volume I identify a wide range of strategies to promote affordable housing in the city. The most applicable strategies can be found in Goal H-3.

**Conclusions and Considerations**

The data presented in this Housing Needs Assessment points to several important considerations for the potential needs of Lake Forest Park residents over the course of the planning horizon:

- **Aging Population**
  - The city’s older population is increasing, signaling a potential need for smaller and/or more easily accessible units.
- **Challenges for Renter Households**
  - Lake Forest Park’s renter households are significantly lower-income than homeowners, face higher rates of housing cost burden, are more racially and ethnically diverse, and are generally smaller households. More affordable units and a greater quantity and variety of rental units, ranging from apartments to ADUs, would better meet the needs of Lake Forest Park’s renter households.
- **Challenges for Workers**
  - The main job sectors in Lake Forest Park pay wages which are not sufficient for those employees to live comfortably in the city. Increasing housing choice would help employees have the opportunity to live in Lake Forest Park, reducing commuting time and resources and balancing jobs and housing.
- **Lack of Housing Size Options**

- The vast majority of housing in the city are larger single-family homes. This provides fewer options for smaller households or those who wish to downsize. Smaller units also tend to be more affordable.
- **Limited Land Availability**
  - Lake Forest Park is zoned nearly exclusively for single-family development, and much of it is built out, with significant environmental constraints in many areas. There is limited land for denser housing development. Rezoning some areas may increase land capacity, but there are also concerns about displacement of naturally occurring affordable units.
- **High Ownership Housing Prices**
  - The majority of houses sold in Lake Forest Park in the past year were not affordable to most residents of the city. Housing prices are very high and continuing to increase. Production of more units, particularly townhomes and condominium units which have been selling at prices affordable to a wider range of Lake Forest Park Households, is necessary to help mitigate the continued increase in housing costs.
- **Spatial Equity Considerations**
  - Lower-income residents, a higher share of BIPOC households, and zones which allow multifamily housing are concentrated in several small areas of Lake Forest Park. Creating more opportunities for all residents to live in a larger area of the city through an increase in housing types such as ADUs and duplexes, which increase affordability while still maintaining neighborhood character, could help alleviate these spatial inequities.

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Lake Forest Park Comprehensive Plan

# Racially Disparate Impacts Analysis

**Date** March 29, 2024  
**To** Mark Hofman, Community Development Director, Lake Forest Park  
**From** David Fiske, Andrew Oliver, Jennifer Shuch, Leland Consulting Group  
**CC** Cristina Haworth, SCJ Alliance

## Introduction

In 2021, the Washington State Legislature passed House Bill 1220 (HB 1220) as an amendment to the state Growth Management Act (GMA). HB 1220 requires that local governments plan for housing at all income levels and assess the racially disparate impacts (RDI) of existing housing policies. Conditions that indicate that policies have racially disparate impacts can include segregation, cost burden, displacement, educational opportunities, and health disparities.

According to state guidance, there are five steps to understanding and addressing racially disparate impacts:

- Step 1: Engage the Community
- Step 2: Gather & Analyze Data
- Step 3: Evaluate Policies
- Step 4: Revise Policies
- Step 5: Review & Update Regulations

This report accounts for both Step 2 and Step 3 – it includes a summary of findings based on data from the US Census Bureau, US Department of Housing and Urban Development (HUD), and other sources. These findings then inform the policy evaluations and recommendations found at the end of the report.

## Key Findings

- Lake Forest Park is less diverse than King County.
- Census block groups in Lake Forest Park where racial covenants were prevalent are still largely less diverse than other areas of the city.
- Households of color, particularly Hispanic/Latino and Asian households are more likely to be cost burdened than white households. In addition, renting is more common among non-white households and the cost burden for renter households is significantly higher than for owner households. Hispanic/Latino and Black/African American households are significantly more likely to rent than own their homes.
- There is a shortage of housing available for those making less than 30% of the Area Median Income (AMI) and those making between 80% and 100% AMI.
- One third of Black/African American households in Lake Forest Park are classified as extremely low-income, making less than 30% of AMI. Just 14% of Hispanic/Latino households earn more than 100% AMI.

# Historical Context

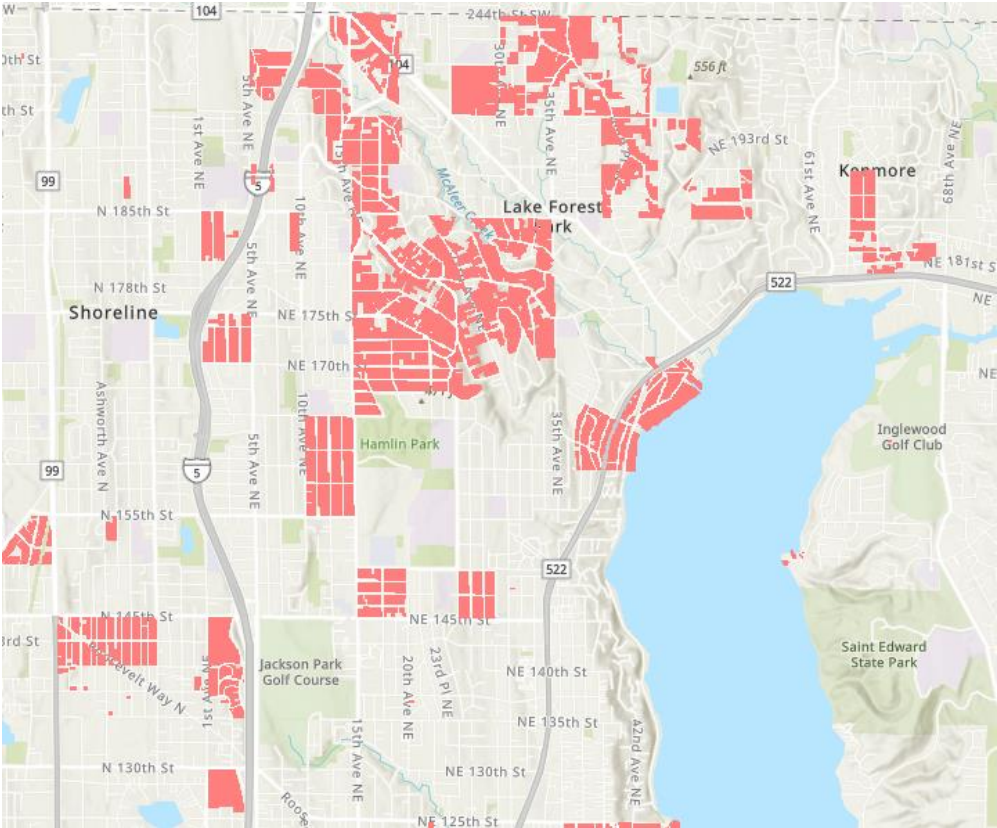
Throughout the history of the United States, a combination of laws and practices have impacted where specific groups of people live, what opportunities they have access to, and their ability to build wealth through stable housing. Unfortunately, many of these policies explicitly or implicitly benefited white residents at the expense of all others. The legacy of policies like redlining, which used racial criteria in determining which neighborhoods were suitable for government-backed loans, highway development through predominantly-Black neighborhoods, and racial covenants explicitly excluding certain groups from owning specific properties continues to impact non-white communities today.

While many cities have acknowledged the harms of these policies, many of which are no longer legal, there are still policies in effect today that hold cities back from rectifying systemic harms. These can include policies that reference vague concepts like "neighborhood character," as well as those that permit only the most expensive homes to be built, thus shutting lower-income residents out of high-opportunity areas.

This section contains a historic review of some of the known policies and programs that caused racially disparate impacts in Lake Forest Park as a starting point in understanding present-day conditions.

Throughout the United States, including in Lake Forest Park, racial covenants were used to exclude certain races and religious groups from residing in specific neighborhoods, creating exclusive areas for white, Christian residents. The map in Figure 1 below shows parcels in Lake Forest Park and surrounding communities that had racial covenants or deed restrictions. These were legally enforceable from 1927 to 1968.

**Figure 1. Racially Restricted Parcels in Lake Forest Park and Surrounding King County Communities**



Source: Washington State Racial Restrictive Covenants Project.

Figure 2 below shows some of the language used to exclude non-white residents from subdivisions in Lake Forest Park:



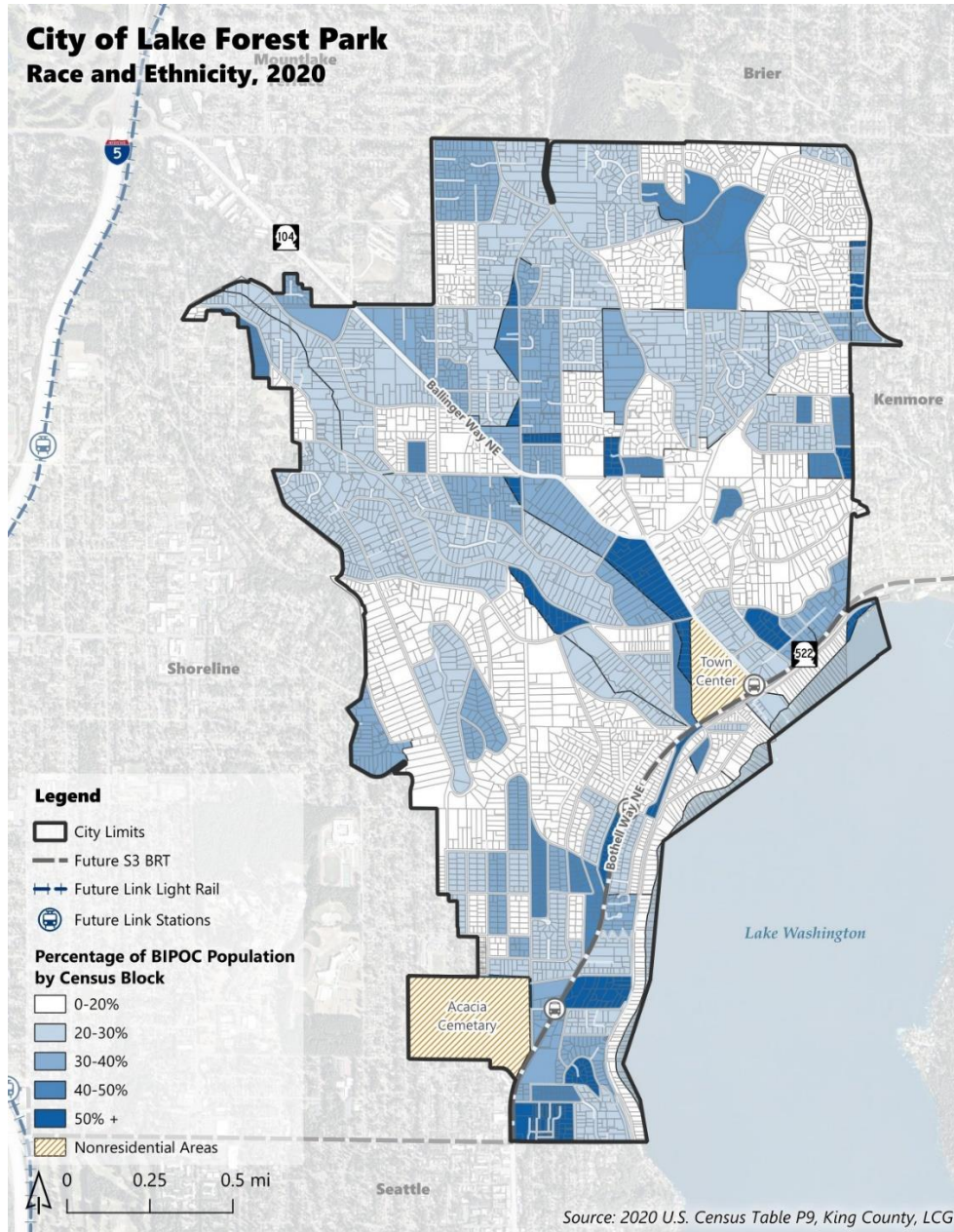
Figure 2. Language Used for Restrictive Subdivisions in Lake Forest Park

Lake Forest Park	Brookside Addition to Lake Forest	<p><i>The said property, or any part thereof, shall used for residence purposes only, and shall be occupied only by persons of the white race, except that servants not of the white race but actually employed by a white occupant, may reside on said premises.</i></p> <p>Developer: Harper, Guy, Properties covered: 3,</p>
	Chittenden's Terrace Park	<p><i>No person excepting of the Caucasian race shall ever be permitted to own or occupy said premises or reside thereon, excepting the capacity of a domestic servant</i></p> <p>Developer: Chittenden, Clyde and Grace, Properties covered: 5,</p>
Lake Forest Park	Lake Forest Park	<p><i>said property or any part thereof, shall be used for residence purpose only, and shall be occupied only by persons of the white race except that servants not of the white race but actually employed by a white occupant may reside on said property.</i></p> <p>Developer: Seattle Title Trust Co., Properties covered: 286,</p>
Lake Forest Park	Lake Forest Park 2nd Addition	<p><i>It is the purpose of the Seller to make and keep said Addition a high-class residence district, and it is further agreed that said premises or any part thereof shall not be sold or leased or permitted to be occupied by any person or persons not of what is commonly known as the White or Caucasian Race.</i></p> <p>Developer: North Seattle Improvement Co., Properties covered: 233,</p>

Source: Washington State Racial Restrictive Covenants Project.

The combination of racially restrictive covenants and redlining impacted the ability of Black veterans to fully access homeownership loan benefits through the Servicemen’s Readjustment Act of 1944 (GI Bill), which enabled white veterans to buy housing and build wealth in the suburbs. Racial covenants have since been declared unconstitutional, and Fair Housing laws have been put into effect. Lake Forest Park has gone from nearly 100% white in 1960 to 77% white in 2020. While this is a significant improvement, Lake Forest Park is still significantly less diverse than King County overall, which is 58% white. In Lake Forest Park today, Census Block groups where racial covenants were in effect are still largely white today.

Figure 3. Race and Ethnicity in Lake Forest Park by Census Block Group (2020)



## Assessing Racially Disparate Impacts

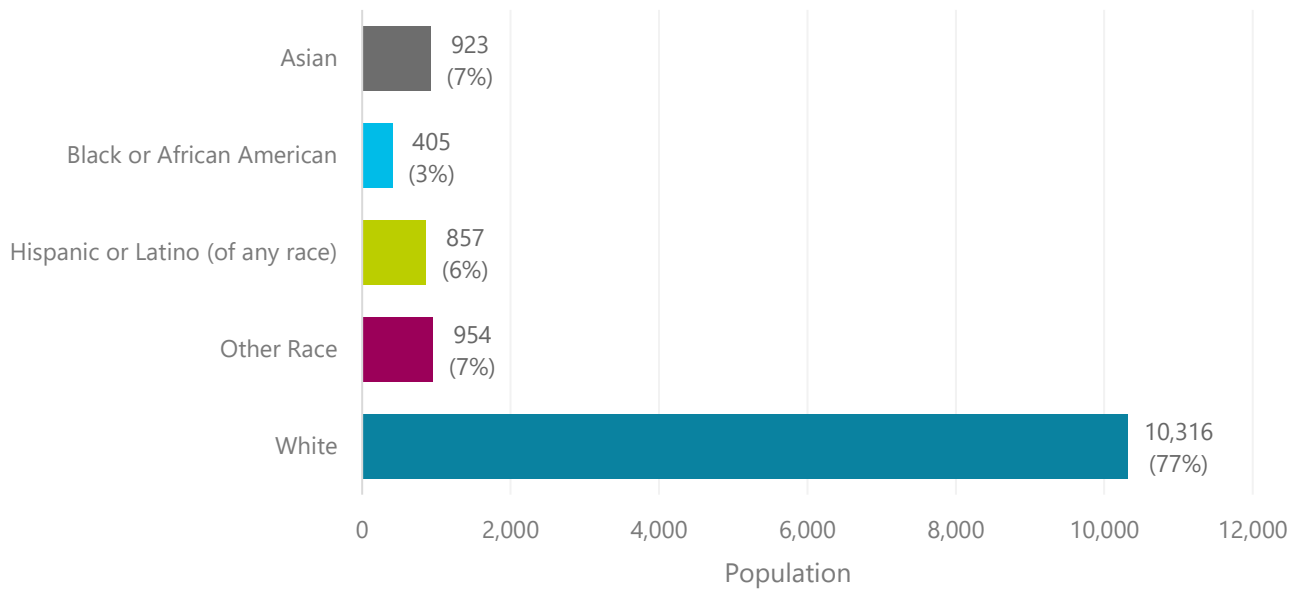
Between 2015 and 2020, Lake Forest Park became slightly more diverse, as the population of white residents declined and the population of Hispanic/Latino residents increased. The population went from 81% white to 77% white over the course of five years. Over the same period, King County's population went from 63% white to 58% white, with Asian, Hispanic/Latino, and multi-racial residents seeing the highest population gains.

Figure 4. Change in Population by Race/Ethnicity, Lake Forest Park and King County

Race or Ethnic Category	Lake Forest Park			King County		
	2015	2020	Change	2015	2020	Change
American Indian and Alaska Native	9	29	20	11,972	10,307	-1,665
Asian	912	923	11	317,214	405,835	88,621
Black or African American	291	405	114	123,350	141,566	18,216
Hispanic or Latino (of any race)	508	857	349	189,808	218,763	28,955
Native Hawaiian and Other Pacific Islander	45	19	-26	15,681	16,673	992
Other Race	12	28	16	3,756	9,449	5,693
Two or more races	715	878	163	99,291	127,070	27,779
White	10,567	10,316	-251	1,284,684	1,295,401	10,717
<b>Total</b>	<b>13,059</b>	<b>13,455</b>	<b>396</b>	<b>2,045,756</b>	<b>2,225,064</b>	<b>179,308</b>

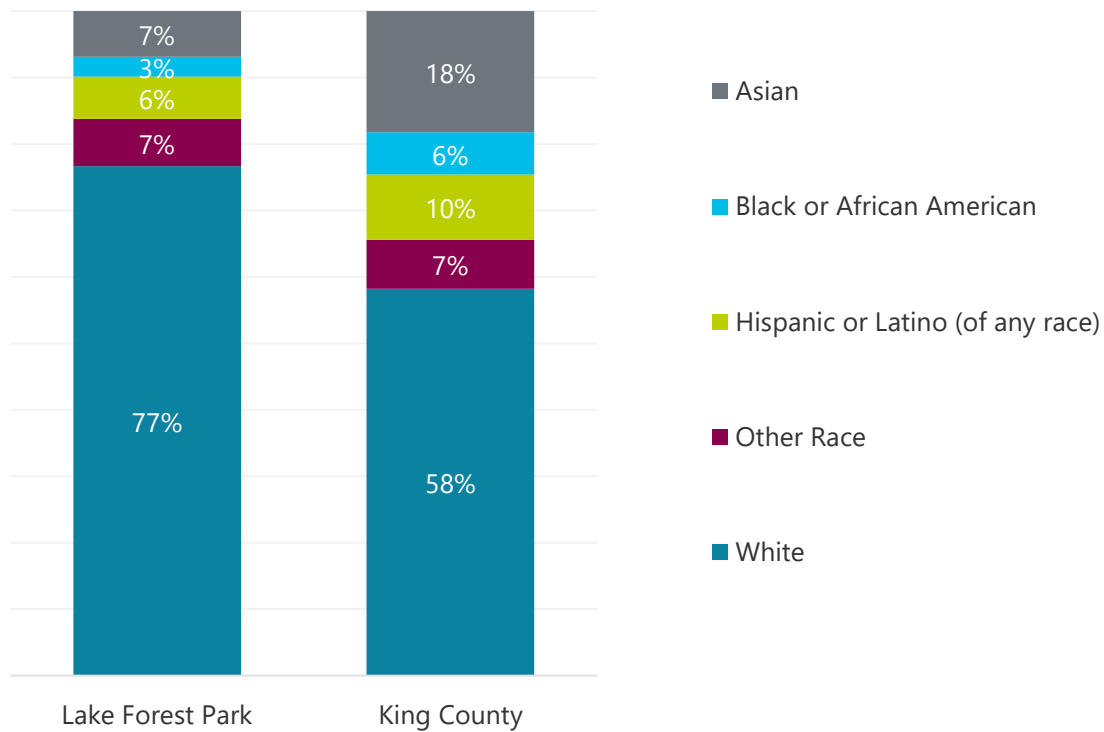
Source: US Census Bureau, 2011-2015 and 2016-2020 American Community Survey 5-Year Estimates (Table DP05); Washington Department of Commerce, 2023

Figure 5. Population by Race/Ethnicity in Lake Forest Park (2020)



Source: US Census Bureau, 2016-2020 American Community Survey 5-Year Estimates (Table DP05); Washington Department of Commerce, 2023.

Figure 6. Racial Composition of Lake Forest Park and King County (2020)



Source: US Census Bureau, 2016-2020 American Community Survey 5-Year Estimates (Table DP05); Washington Department of Commerce, 2023.

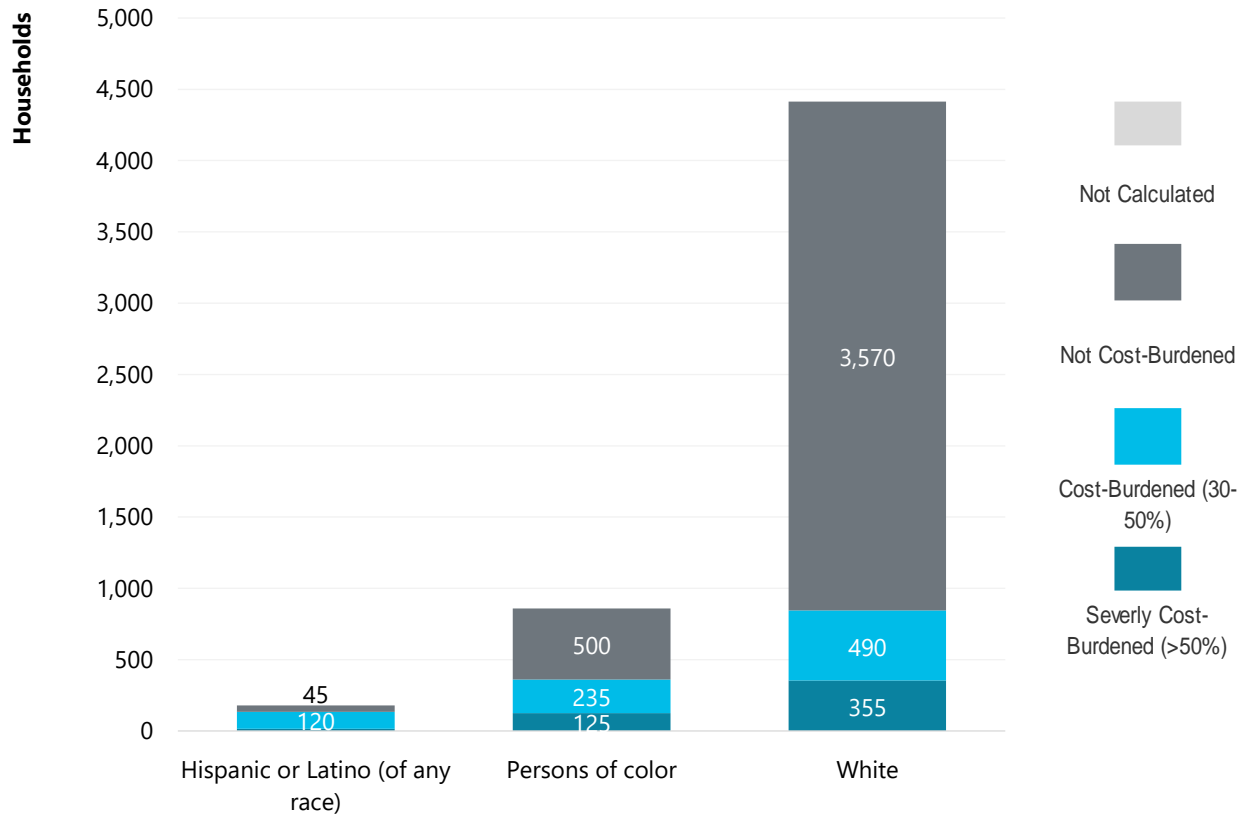
Lake Forest Park is a relatively wealthy community with high housing costs. The city includes 4,190 owner households and 1,085 rental households. Of the owner households, 16.6% are cost burdened, with 10% spending between 30% and 50% on housing costs and 6.6% spending more than 50% on housing costs. By contrast, 47% of renter households in Lake Forest Park are rent burdened, with 28% spending between 30 and 50% on housing costs and 19% spending more than 50% on housing costs. This sharp divide in stability between renters and owners can result in racially disparate impacts when renters are more likely to be people of color. In Lake Forest Park, 81% of Hispanic/Latino households and 82% of Black/African American households rent their homes, compared with 16% of white households. While 67% of Hispanic/Latino households are cost burdened and another 8% are severely cost burdened, 81% of white households are not cost burdened.

Figure 7. Number of Households by Cost Burden in Lake Forest Park (2019)

	White	Black or African American	Asian	American Indian or Alaska Native	Pacific Islander	Other Race	Hispanic or Latino (of any race)	Total
<b>Owner Households</b>								
Not Cost Burdened	3,160	15	205	0	0	75	35	3,490
Total Cost-Burdened	570	0	90	0	0	35	0	695
<i>Cost-Burdened (30-50%)</i>	350	0	50	0	0	20	0	420
<i>Severely Cost-Burdened (&gt;50%)</i>	220	0	40	0	0	15	0	275
Not Calculated	0	0	0	0	0	0	0	0
<b>Total</b>	<b>3,730</b>	<b>15</b>	<b>300</b>	<b>0</b>	<b>0</b>	<b>110</b>	<b>35</b>	<b>4,190</b>
<b>Renter Households</b>								
Not Cost Burdened	410	60	50	0	10	40	10	580
Total Cost-Burdened	275	15	70	0	0	15	135	510
<i>Cost-Burdened (30-50%)</i>	140	0	30	0	0	15	120	305
<i>Severely Cost-Burdened (&gt;50%)</i>	135	15	40	0	0	0	15	205
Not Calculated	0	0	0	0	0	0	0	0
<b>Total</b>	<b>685</b>	<b>70</b>	<b>120</b>	<b>0</b>	<b>10</b>	<b>55</b>	<b>145</b>	<b>1,085</b>
<b>Total Households</b>	<b>4,415</b>	<b>85</b>	<b>420</b>	<b>0</b>	<b>10</b>	<b>165</b>	<b>180</b>	<b>5,275</b>

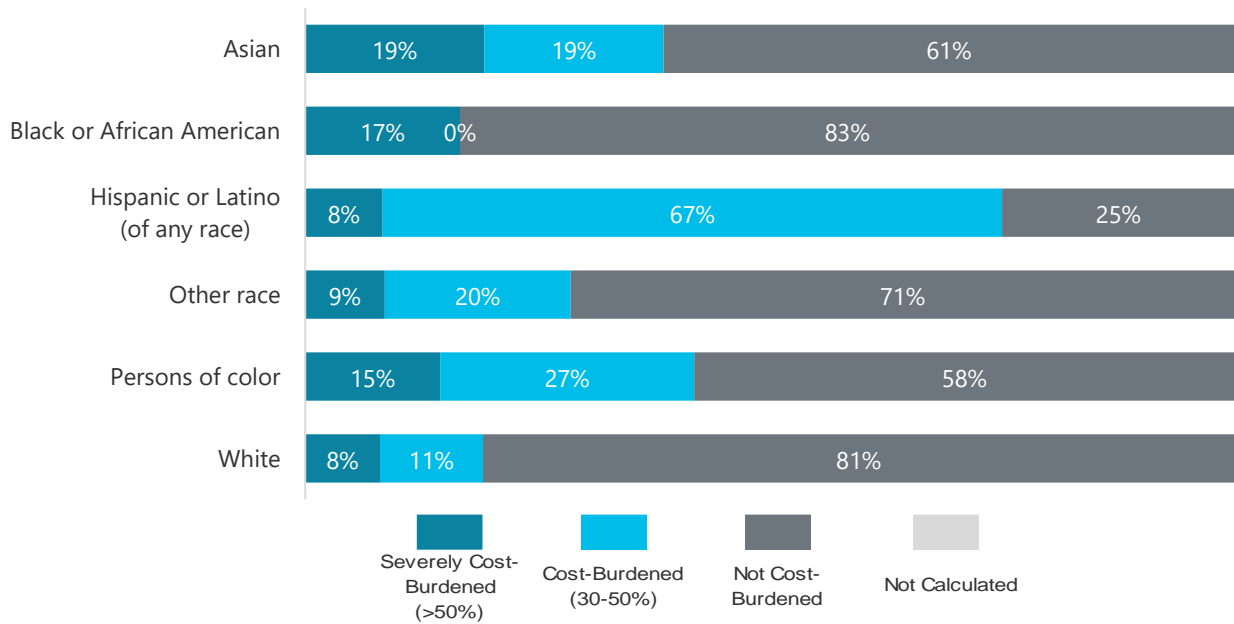
Source: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 9); Washington Department of Commerce, 2023

Figure 8. Lake Forest Park Total Housing Cost Burden by Racial & Ethnic Group, 2019



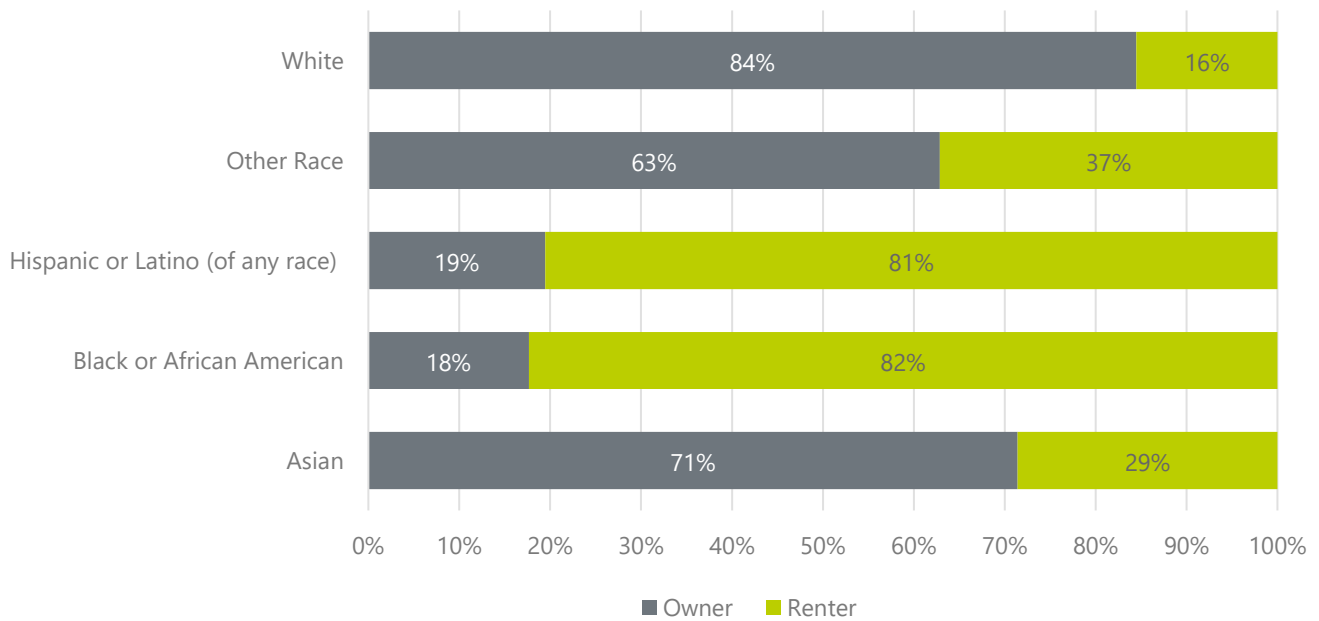
Source: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 9); Washington Department of Commerce, 2023 .

Figure 9. Lake Forest Park Percent of All Households Experiencing Housing Cost Burden, 2019



Source: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 9); Washington Department of Commerce, 2023 .

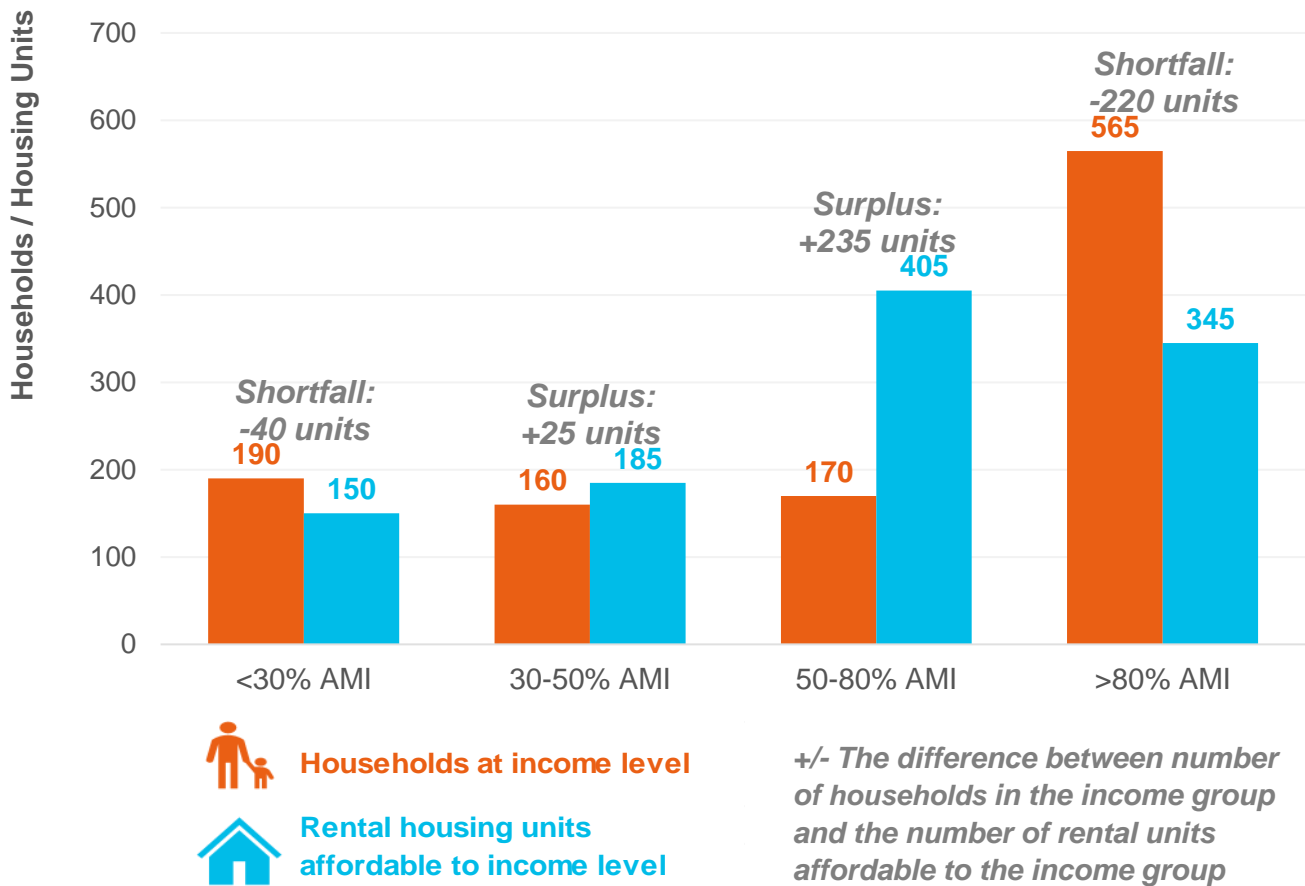
Figure 10. Lake Forest Park Owner and Renter Households by Race & Ethnicity (2019)



Source: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 9).

The renter cost burden in Lake Forest Park is driven by a 40-unit shortfall of units affordable for households making less than 30% of area median income (AMI) and a 220-unit shortfall of units affordable for households making 80% AMI.

Figure 11. Lake Forest Park Renter Households by Income Compared to Rental Units by Affordability, 2019

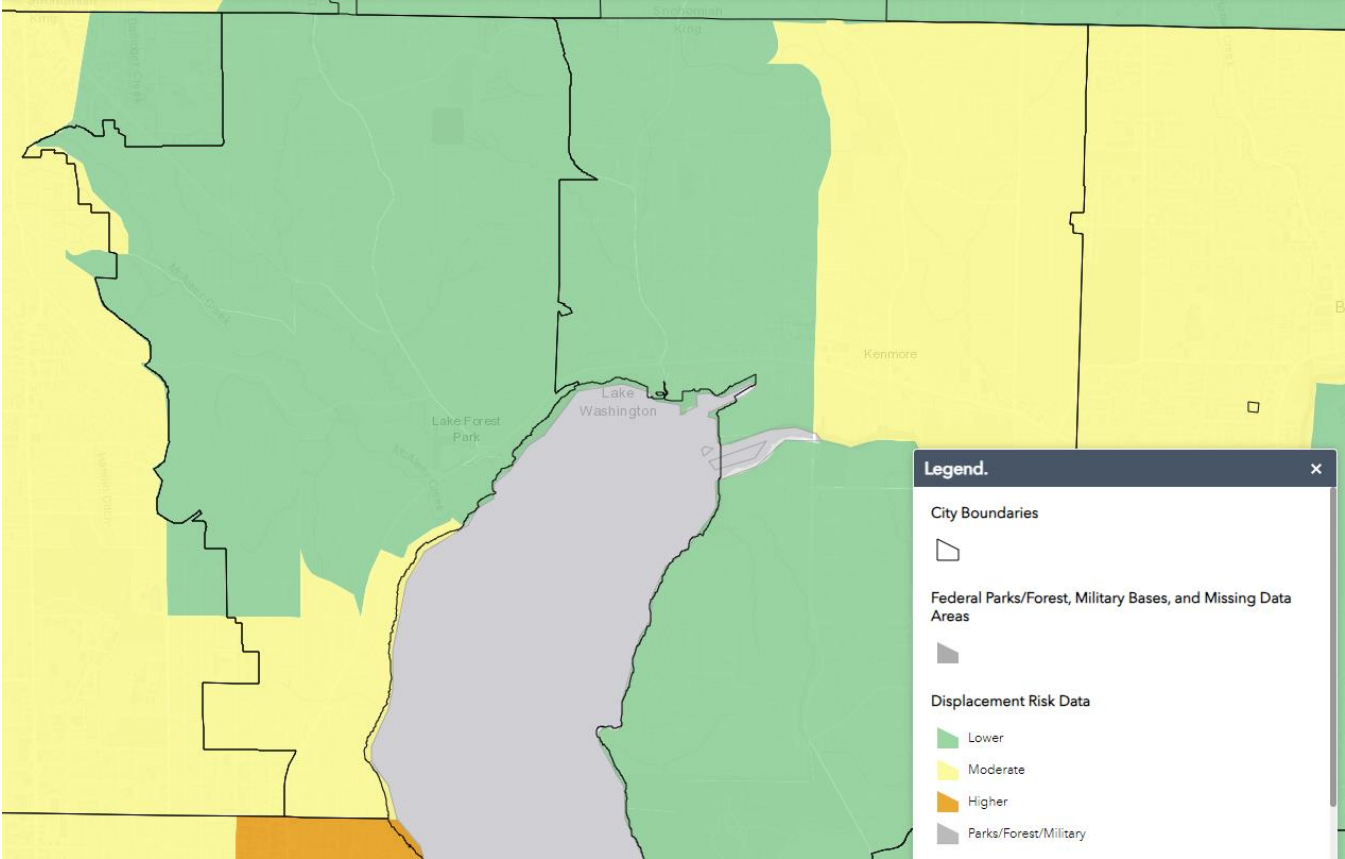


Sources: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 15C) & US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 14B).

Despite housing unit shortfalls in the lower and upper income categories, Lake Forest Park has a relatively low displacement risk compared with nearby communities. Figure 12 below shows PSRC’s displacement risk map – most of Lake Forest Park is considered “lower risk” compared with Kenmore and Mountlake Terrace, where the risk is “moderate.” However, the southern portion of Lake Forest Park, where the majority of the City’s multifamily units are concentrated, has a higher displacement risk than the rest of the city.



Figure 12. PSRC Displacement Risk Map for Lake Forest Park and Surrounding Communities



Sources: Puget Sound Regional Council Displacement Risk Map Tool.

PSRC also considers Lake Forest Park to be a High Opportunity area, due to its high education and economic index scores.

Figure 13. PSRC Opportunity Index Map for Lake Forest Park and Surrounding Communities



Sources: Puget Sound Regional Council Opportunity Index Map Tool.

In Lake Forest Park, 73% of white households make above the median income – the highest share among racial and ethnic groups. Just 14% of Hispanic/Latino households and 54% of Asian households make above 100% AMI. Among Black/African American households, there is a sharp divide – 67% make above the median income, while 33% are considered extremely low-income (making 30% of AMI or less).

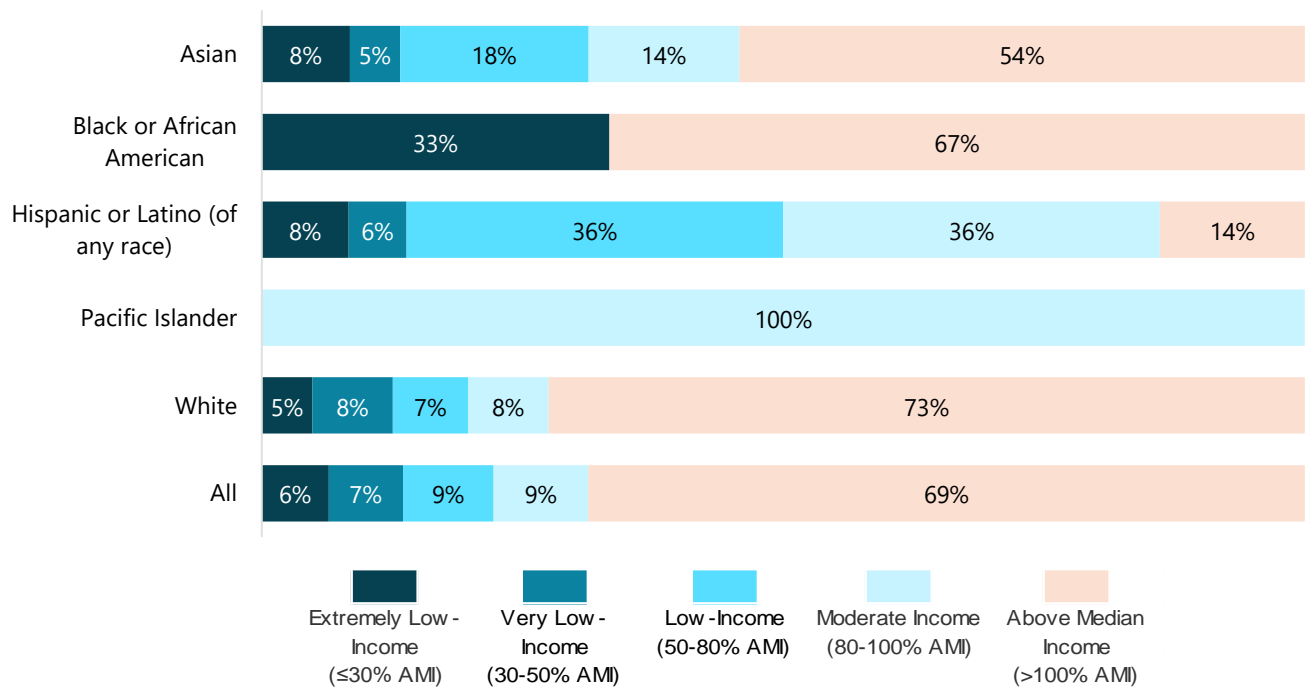
Figure 14. Lake Forest Park Count of Households by Income and Race, 2019

Income Category (% of AMI)	American Indian or Alaska Native	Asian	Black or African American	Hispanic or Latino (of any race)	Pacific Islander	White	Not Reported*	All
<b>Number</b>								
Extremely Low-Income (≤30% AMI)	-	35	30	15	-	215	45	340
Very Low-Income (30-50%)	-	20	-	10	-	340	5	375
Low-Income (50-80%)	-	75	-	65	-	320	-	460
Moderate Income (80-100%)	-	60	-	65	10	340	5	480
Above Median Income (>100%)	-	225	60	25	-	3,205	115	3,630
Total for published estimates	-	415	90	180	10	4,420	170	5,275
<b>Percentage</b>								
Extremely Low-Income (≤30% AMI)	0%	10%	9%	4%	0%	63%	13%	
Very Low-Income (30-50%)	0%	5%	0%	3%	0%	91%	1%	
Low-Income (50-80%)	0%	16%	0%	14%	0%	70%	0%	
Moderate Income (80-100%)	0%	13%	0%	14%	2%	71%	1%	
Above Median Income (>100%)	0%	6%	2%	1%	0%	88%	3%	

\* The category "Other (including multiple races, non-Hispanic)" is suppressed in source data(CHAS 2015-2019 Table 1)

Sources: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 1) & US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 8)

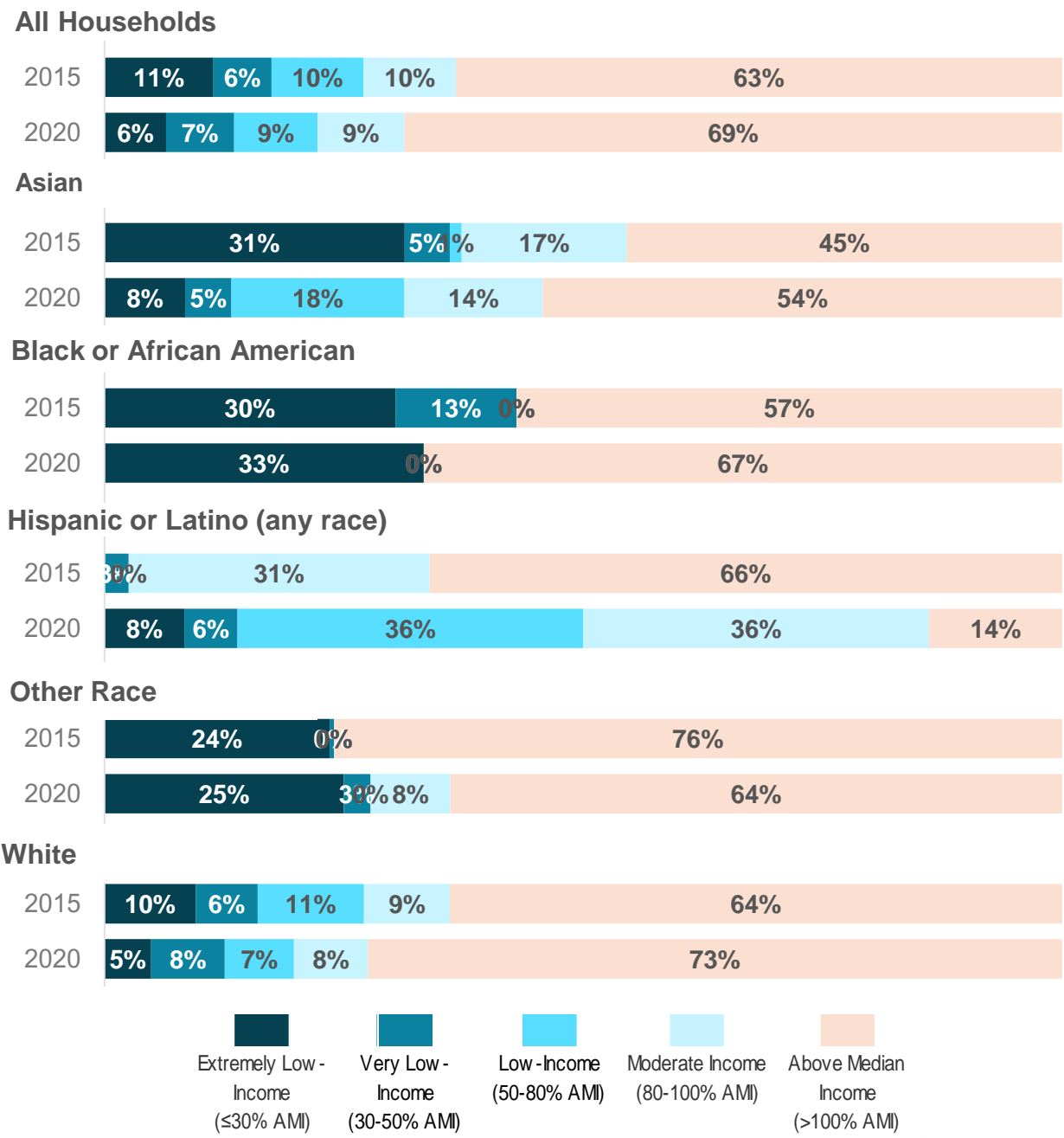
Figure 15. Lake Forest Park Distribution of Households by Income and Race or Ethnicity, 2019



Sources: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 1).

Between 2015 and 2020, the percentage of households making above the median income increased from 63% to 69%. However, over that same period the percentage of Hispanic/Latino households making above the median income decreased significantly – from 66% in 2015 to just 14% in 2020.

Figure 16. Lake Forest Park Percentage of All Households by Income Category and Race (2010-2014 vs. 2015-2019)



Sources: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 1).

# Policy Evaluation

Based on the above analysis, there is room for improvements to policies in Lake Forest Park to reduce racially disparate impacts, and the data was used to inform the next steps of the racially disparate impacts assessment process – evaluating and revising policies that reinforce historical patterns of segregation, displacement, and inequitable outcomes. Taking a proactive approach in shaping policy to address these challenges will benefit all Lake Forest Park households as they City seeks to build a more equitable future.

Based on guidance provided by the Washington State Department of Commerce, the following policy evaluation framework was used to evaluate Lake Forest Park’s existing Housing Element policies:

Criteria	Evaluation
The policy is valid and supports meeting the identified housing needs. The policy is needed and addresses identified racially disparate impacts, displacement and exclusion in housing.	<b>S</b> Supportive
The policy can support meeting the identified housing needs but may be insufficient or does not address racially disparate impacts, displacement and exclusion in housing.	<b>A</b> Approaching
The policy may challenge the jurisdiction’s ability to meet the identified housing needs. The policy’s benefits and burdens should be reviewed to optimize the ability to meet the policy’s objectives while improving the equitable distribution of benefits and burdens imposed by the policy.	<b>C</b> Challenging
The policy does not impact the jurisdiction’s ability to meet the identified housing needs and has no influence or impact on racially disparate impacts, displacement or exclusion.	<b>NA</b> Not applicable

Existing Goal / Policy #	Existing Goal / Policy	Equity Assessment	Why	Notes
<b>Goal H-1: Housing Supply and Diversity.</b> Ensure that Lake Forest Park has sufficient quantity and variety of housing types to meet projected growth and needs of the community.				
Policy H-1.1	Promote fair and equitable access to housing for all persons.	<b>Supportive</b>	The RDI found disparities in housing tenure and cost burden between racial and ethnic groups in Lake Forest Park. Promoting fair and equitable housing policies should help ensure that these disparities do not result in displacement.	As written, this policy is relatively vague. The City should consider employing more specific language related to housing opportunities and Fair Housing laws.
Policy H-1.2	Provide an adequate supply of land to meet the city's housing growth	<b>Approaching</b>	King County's County-wide policies require an adequate supply of housing at a variety of cost levels. While providing an adequate land supply is	As the City works to provide an adequate supply of land to meet its growth target, it should consider that the location and types of housing

	target, as established in the King County County-wide policies		likely to improve racial housing disparities, this policy does not directly address racially disparate impacts.	that can be built are aligned with the needs of households of color.
Policy H-1.3	Provide for a variety of residential densities and housing types.	<b>Approaching</b>	Increasing the density in residential areas and increasing flexibility in the zoning code to allow for more types of housing could potentially help increase opportunities for homeownership and reduce cost burden.	The City should consider working directly with communities of color to understand what types of housing would best meet their needs. This would help the City ensure that the variety of housing types allowed matches community preferences.
Policy H-1.4	Consider the impact on housing capacity and diversity when making land use policy and regulatory decisions.	<b>Approaching</b>	Considering the impacts of policies and regulations on housing capacity and diversity could help steer the City toward more equitable outcomes. However, the City should also explicitly consider the potential impacts of policies on different racial and ethnic groups.	Potentially re-word this to: "Consider the impact of land use policies and regulatory decisions on housing capacity, diversity, and racial equity."
Policy H-1.5	Promote residential clustering as a means to protect environmentally sensitive areas and encouraging infill development.	<b>N/A</b>		Keep
Policy H-1.6	Encourage opportunities for mixed-use development in areas where a mix of commercial and residential uses would promote desired	<b>Approaching</b>	Providing new, high density housing near services and transit can help increase opportunities for those previously shut out of high-opportunity areas due to housing costs or other policies.	[talk about need for density to support affordable TOD]

	character and economic vitality, including transit-oriented development along transit corridors.			
Policy H-1.7	Create opportunities for housing in a variety of settings, sizes, and affordability levels throughout the City.	<b>Approaching</b>	Housing is not one-size-fits-all. Different households will need housing of different sizes and with different characteristics and amenities. While apartments near transit may be ideal for some families, others might want to live in intergenerational households where they have more space. By allowing a variety of housing types throughout different neighborhoods, the City will help meet the needs of a diverse population.	Regulations related to this policy should ensure that different housing types are allowed in a wide variety of neighborhoods. This will help prevent wealthier, whiter neighborhoods from becoming enshrined as protected areas and increase integration.
Policy H-1.8	Support flexibility in zoning that responds to the diverse needs of a range of household sizes, incomes, and ages. Consider amending regulations to encourage more accessory dwelling units (mother-in-law units), duplexes, townhouses, and other types of housing.	<b>Approaching</b>	Middle housing types, including duplexes, townhomes, and small apartment buildings provide lower-cost opportunities for homeownership and can be particularly suitable for intergenerational families. Flexible zoning that allows these housing types can increase opportunities for households of color in historically exclusive neighborhoods.	Regulations related to this policy should ensure that different housing types are allowed in a wide variety of neighborhoods. This will help prevent wealthier, whiter neighborhoods from becoming enshrined as protected areas and increase integration.
Policy H-1.9	Continue to ensure that manufactured housing, as defined in the	<b>Approaching</b>	Manufactured housing is a more affordable option than traditional stick-built housing. It could potentially provide homeownership opportunities	Allowing manufactured homes on single family lots could provide a pathway to homeownership, but the limited number of suitable

	current building code, is allowed in all single-family zones and regulated the same as stick-built housing.		for lower income residents and households of color.	vacant parcels in single family zones in Lake Forest Park indicates that this policy is unlikely to have a significant impact on racial disparities.
<b>Goal H-2: Neighborhood Character.</b> Preserve and enhance the unique character of the City's residential neighborhoods				The phrase "unique character" is vague and is typically used to signal a preference for preserving the status quo rather than improving policies to increase opportunities for historically excluded communities.
Policy H-2.1	Continue to incorporate site standards, landscaping, and building design guidelines into land use regulations to ensure that infill development complements surrounding uses and the character of Lake Forest Park.	<b>Challenging</b>	While it is not unreasonable to implement design or site standards aimed at reducing impacts on residents of a particular neighborhood, often these requirements negatively impact feasibility or limit what can be built beyond what is allowed in the City Code. They also communicate to residents that denser housing types are inherently a nuisance.	Ensuring that new development "complements the character" of Lake Forest Park insinuates that the City seeks to preserve the largely white status quo, which was created through past policy decisions. The City should consider a more forward-looking approach that builds toward a vision of Lake Forest Park as a diverse and vibrant community.
Policy H-2.2	Promote site planning techniques that create quality outdoor spaces and are in harmony with neighboring properties.	<b>Challenging</b>	Outdoor space is an important element in neighborhoods. However, policies that require high quality outdoor space on every parcel can limit what can be built on site. It also privileges private outdoor spaces over community spaces.	The City should ensure that there is adequate park space throughout neighborhoods so that on-site requirements for outdoor space are not necessary to ensure that all residents have equitable access to green space.



Policy H-2.3	Provide guidelines for transitions and buffers around different types of uses, in order to mitigate any negative impacts associated with higher-intensity uses.	<b>Challenging</b>	Higher-intensity uses, including apartment and mixed use commercial and residential buildings, are not inherently a detriment to a neighborhood or community. The framing of this policy indicates a belief that residents in single-family homes must be protected from those in multifamily housing - a belief often perpetuated by racial stereotypes.	The City should specify what types of uses require a buffer - while a buffer may be appropriate between a residential neighborhood and a light industrial site or a concert venue, the City should not aim to segregate different types of housing from each other.
Policy H-2.4	Preserve and enhance the condition of neighborhoods and housing through public and private investment and regulations.	<b>Challenging</b>	Public and private investments into neighborhood maintenance and improvements benefit all residents. However, preserving neighborhood conditions is relatively vague, and could lead to regulations aimed at protecting specific neighborhoods from new development.	The City should increase the specificity of this policy to make it clear that this is intended to help residents and homeowners maintain and improve their properties rather than to preserve the status quo.
<b>Goal H-3: Housing Affordability.</b> Provide for a range of housing opportunities to address the needs of all economic segments of the community.				
Policy H-3.1	Preserve and enhance affordable housing stock by investing in existing neighborhoods.	<b>Approaching</b>	Public investment in neighborhoods, particularly those with concentrations of affordable housing, is a policy that could benefit all residents. However, it is unlikely to decrease racially disparate impacts.	The City should prioritize investment in neighborhoods that have been historically underserved to ensure that this policy addresses racial disparities
Policy H-3.2	Incentivize development of affordable housing, such as density bonuses, height increases, tax incentives, and simplified	<b>Approaching</b>	Incentives aimed at increasing the supply of affordable housing will help provide more opportunities for residents with lower incomes, who are disproportionately in non-white households. However, the location of where these incentives will be available will	The City should target these incentives in high-opportunity areas connected to services and transit, and where there has not previously been significant investment in affordable housing.

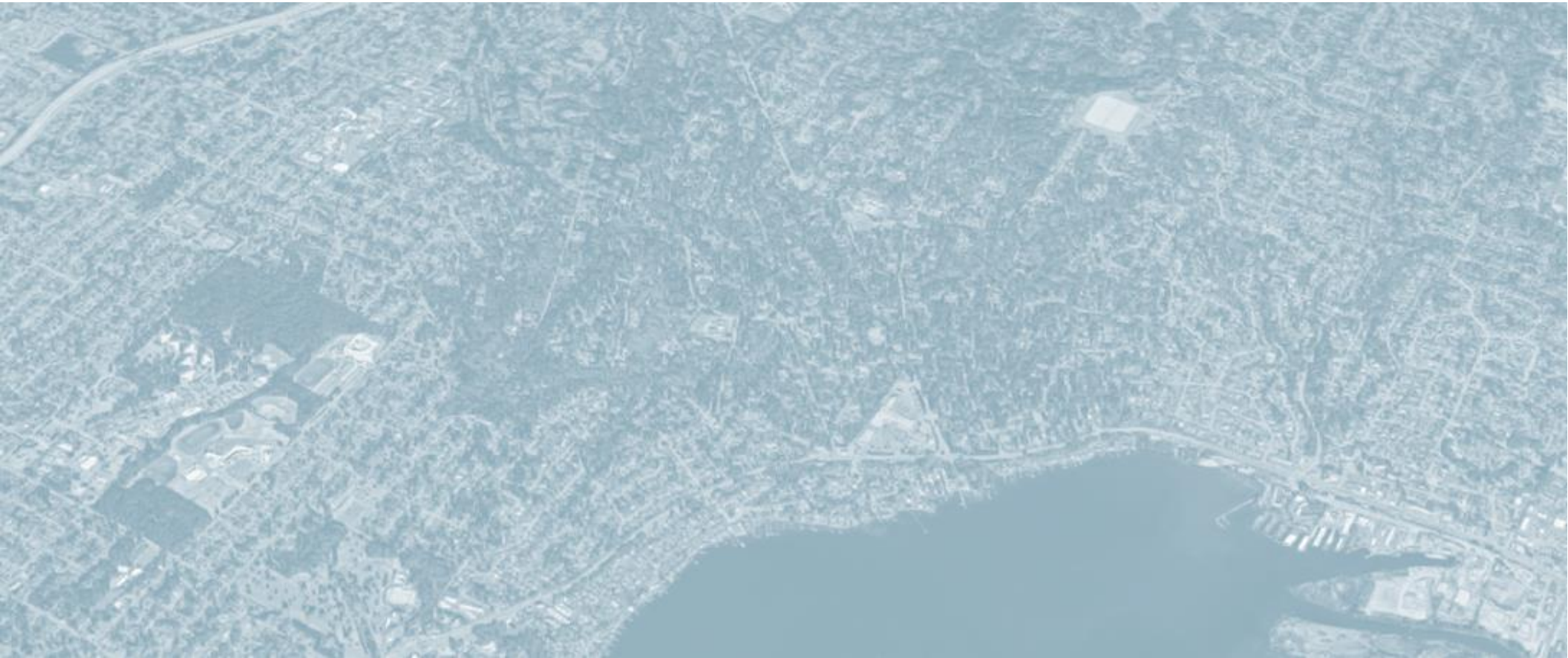
	design requirements.		impact its ability to address racial disparities more directly.	
Policy H-3.3	Support non-profit organizations that construct and manage affordable housing.	<b>Approaching</b>	Supporting non-profit organizations that construct and manage affordable housing is crucial for attracting new affordable housing development. However, while some of these organizations specifically serve local households of color, this is not the case for all non-profit affordable housing providers.	The City should ensure that as it builds these relationships it is not overlooking local, specialized organizations with racial equity and environmental justice goals.
Policy H-3.4	Encourage the location of new affordable housing units near community amenities and services, such as transit.	<b>Supportive</b>	Affordable housing near community amenities and services can increase opportunities for households of color in areas where barriers to housing tend to be higher.	
Policy H-3.5	Support both rental and ownership forms of affordable housing in a variety of locations, types, and sizes.	<b>Supportive</b>	Housing is not one-size-fits-all. Different households will need housing of different sizes and with different characteristics and amenities. While apartments near transit may be ideal for some families, others might want to live in intergenerational households where they have more space. By allowing a variety of housing types throughout different neighborhoods, the City will help meet the needs of a diverse population.	Regulations related to this policy should ensure that different housing types are allowed in a wide variety of neighborhoods. This will help prevent wealthier, whiter neighborhoods from becoming enshrined as protected areas and increase integration.
Policy H-3.6	Encourage energy efficient design features in new affordable housing units.	<b>N/A</b>		Keep

<p>Policy H-3.7</p>	<p>Connect residents to programs providing information on affordable housing, financial literacy, and homeownership counseling.</p>	<p><b>Supportive</b></p>	<p>While programs that provide information on housing and financing do not increase the housing supply, they can address barriers to homeownership by connecting qualified households with resources they may not be aware of. The implementation of this policy and the types of resources it connects residents to will determine its impact on racial disparities.</p>	<p>To understand the demand for this type of program and the specific types of assistance needed by those who have historically been shut out of housing opportunities in Lake Forest Park, the City should develop this program with the assistance of groups representing and connected to communities of color.</p>
<p>Policy H-3.8</p>	<p>Consider the impacts of City regulations on housing cost and supply and take steps to address impacts.</p>	<p><b>Approaching</b></p>	<p>Evaluating the impacts of local regulations on the housing supply will help the City plan for better outcomes. However, as written this policy is relatively vague and it is not clear what its impact will be.</p>	<p>The City should ensure that as it reviews its policies it considers each policy's impacts on segregation, racial equity, and displacement along with housing cost and supply.</p>
<p>Policy H-3.9</p>	<p>Collaborate with regional jurisdictions to meet housing growth targets and address housing issues that cross jurisdictional boundaries.</p>	<p><b>Approaching</b></p>	<p>Collaborating and coordinating with regional jurisdictions is essential to addressing the housing crisis. However, while this policy could potentially increase housing options for households of color, it does not directly address racial disparities.</p>	<p>Through the Comprehensive Plan process, cities throughout the region will be conducting racially disparate impact analyses as well as goal and policy reviews. These analyses should be incorporated into regional partnerships to address housing challenges.</p>
<p>Policy H-3.10</p>	<p>Work with community and regional partners, including the King County Housing Authority, to address the demand for special needs housing and affordable housing in Lake Forest Park and</p>	<p><b>Supportive</b></p>	<p>Communities of color that have faced housing discrimination and segregation typically have higher rates of chronic illness, disability, and homelessness. By ensuring there is not only a sufficient supply of affordable housing but also a sufficient supply of housing designed to accommodate residents with specific needs will help address racial disparities.</p>	

	the surrounding area.			
<p><b>Goal H-4: Special Needs.</b> Encourage and support a variety of housing opportunities for those with special needs, including older adults, people with disabilities, and the homeless.</p>				
Policy H-4.1	Support measures that allow those with special needs to remain in the community as their housing needs change, including connecting them with available services and benefits.	<b>Supportive</b>	Allowing people to age in place and maintain ties to their communities can improve health outcomes and reduce social isolation.	
Policy H-4.2	Encourage universal design to maximize building lifecycle and accessibility.	<b>Supportive</b>	Universal design benefits a wide variety of people, including children, the elderly, parents, and disabled residents. It is particularly important for fostering multi-generational communities.	The City should create incentives specifically designed to encourage universal design. It should also connect with households of color to better understand their specific accessibility needs.
Policy H-4.3	Provide housing opportunity for special needs populations through development regulations.	<b>Approaching</b>	The City's development regulations should allow for a variety of housing types, including those that serve disabled, homeless, or otherwise vulnerable populations. However, the impact of these regulations on racial disparities depends on	As the City considers development regulations that allow for a wider variety of housing types, it should ensure that these regulations do not exacerbate existing patterns of segregation.

			the types of regulations that are adopted.	
Policy H-4.4	Incentivize the location of special needs housing near services and public transportation.	<b>Supportive</b>	Locating housing for disabled, homeless, and/or elderly residents near transit and services is essential for maintaining social contacts and accessing jobs, medical care, and other necessities.	The location of where these incentives will apply is important to its success. The City should ensure that these types of housing are not allowed only on the busiest streets or corridors near transit.
Policy H-4.5	Support public and private housing services for people who are homeless.	<b>Approaching</b>	Functional services are essential for the success of permanent supportive housing, or other housing types aimed at supporting homeless residents. Offering consistent financial support for these programs will help them maintain an adequate level of service to meet resident needs.	The City should be specific in defining what kind of support it will provide. Monetary support to keep programs running and building capacity is ideal. Moral support is unlikely to improve outcomes for homeless residents.
<b>Goal H-5: Internal Consistency.</b> Balance and maintain consistency between housing needs and related City policies, including land use, environmental preservation, human services, and economic development.				
Policy H-5.1	Provide physical infrastructure and amenities to support vibrant residential neighborhoods, consistent with adopted land use designations.	<b>N/A</b>		Keep

# LAKE FOREST PARK MIDDLE HOUSING FEASIBILITY AND RECOMMENDATIONS REPORT



## Introduction

In 2023, Lake Forest Park received a Middle Housing Grant from the Washington State Department of Commerce to study and implement code amendments in compliance with RCW 36.70A.635 and related RCW sections codifying House Bill 1110. HB 1110, adopted in 2023, requires 77 cities, including Lake Forest Park, to update their Comprehensive Plan housing elements and development regulations to allow for middle housing in all residential zones by June 30, 2025. If jurisdictions fail to meet this deadline, the State will impose a model code in the stead of a locally adopted option (Lake Forest Park would be subject to the [model code](#) that applies to Tier 3 cities).

The City engaged an interdisciplinary team led by SCJ Alliance, and including Leland Consulting Group (LCG) and Fehr & Peers, to complete a series of analyses to ensure Lake Forest Park's implementation of middle housing is not only in compliance with HB 1110 requirements, but also meets the unique needs and contexts of the city.

LCG was hired as part of this team to analyze middle housing typologies and development feasibility. The balance of this report includes this analysis, and includes:

- Analysis of Middle Housing Types & Development Feasibility in Lake Forest Park Neighborhoods
- Analysis of Alternative Compliance Path for Alternative Density Requirements
- Implementation & Policy Recommendations for Middle Housing

Though this work is a separate effort, this same team is working in parallel as part of the City's Comprehensive Plan update, and the Housing Needs Assessment conducted as a part of that planning effort helped inform the potential for new middle housing types within the city's residential areas.

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## EXECUTIVE SUMMARY

This executive summary highlights the major takeaways from each section of this report. Included below are the basic requirements and intent of House Bill 1110 as it applies to Lake Forest Park, the defining characteristics of Lake Forest Park's various neighborhoods and zoning, and the complete list of implementation recommendations that resulted from the analysis.

The recommendations in this report are outlined as key considerations for City review, and are meant to highlight potential policy decisions or implementation actions for the City to consider as it moves towards code amendments and further study of middle housing opportunities in Lake Forest Park.

## HB 1110 and Middle Housing

- As a Tier 3 city, **Lake Forest Park is required to allow at least two dwelling units per lot** on all lots zoned predominantly residential.
- **HB 1110 also allows cities to follow an Alternative Compliance Path**, which would allow the City to exclude up to 25% of its residential parcels from increased density requirements if they meet specific criteria, such as being located in critical areas or buffers. These parcels cannot be near future high-capacity transit or in areas with racially restrictive covenants. Balancing these requirements in Lake Forest Park is complex and makes this path challenging for the city.
- The nine types of middle housing introduced by HB 1110 include duplexes, triplexes, fourplexes, fiveplexes, sixplexes, townhouses, stacked flats, courtyard apartments, and cottage housing. While Lake Forest Park is only required to allow two units per residential lot, it is **required to allow four of these nine housing types within the city**.
- **There are a wide variety of benefits associated with allowing middle housing** in all residential zones. Middle housing fits well into established residential neighborhoods, promotes affordability (particularly affordable homeownership), helps to address historical patterns of segregation, and aligns with climate goals.

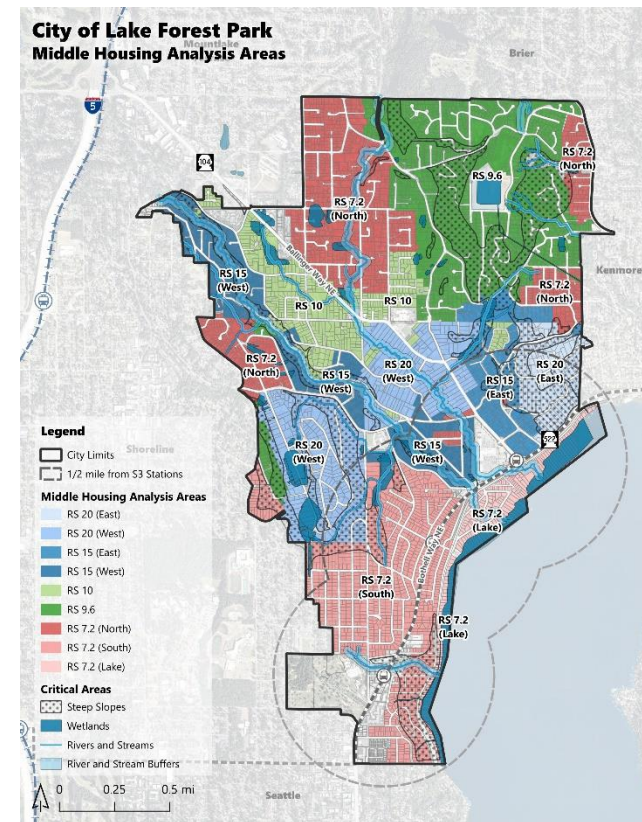


## Lake Forest Park Neighborhood Characteristics

- **Lake Forest Park's five RS zones make up 96 percent of total parcel acreage.** These zones allow single family dwellings, ADUs, and manufactured housing but do not currently allow for duplexes or other middle housing types.
- To analyze the feasibility of middle housing in these five residential zones, **LCG categorized different areas of the city by zone, location, and environmental constraints.** Lake Forest Park's RS 10 and RS 15 zones have a particularly high share of environmentally constrained parcels. The RS 10, RS 15, and RS 20 zones also have a higher share of parcels that are below the minimum lot size required by Lake Forest Park's zoning code.
- **The neighborhoods along Bothell Way NE and Ballinger Way NE are the most walkable areas of the city.** These neighborhoods should be considered potential targets for higher-density middle housing types.
- Lake Forest Park's municipal code includes a Reasonable Economic Use Exemption that enables some low intensity building on lots that are fully constrained by critical areas and buffers. **Depending on the middle housing strategy the City chooses to pursue, it should consider allowing duplexes, cottage clusters, or others to be considered through this same process.**
- **There are currently at least 22 existing middle housing units located in Lake Forest Park's single-family zones according to assessor data,** despite not being allowed under current zoning regulations. These middle housing units fit in with the surrounding residential construction

and offer examples of how middle housing could look in the future.

- LCG analyzed existing parcels in five different areas of Lake Forest Park to determine what could be built on lots of various sizes and with differing environmental constraints. Due to the large size of many city lots, **a wide variety of housing types are feasible in the city's residential neighborhoods.**



## Implementation Considerations

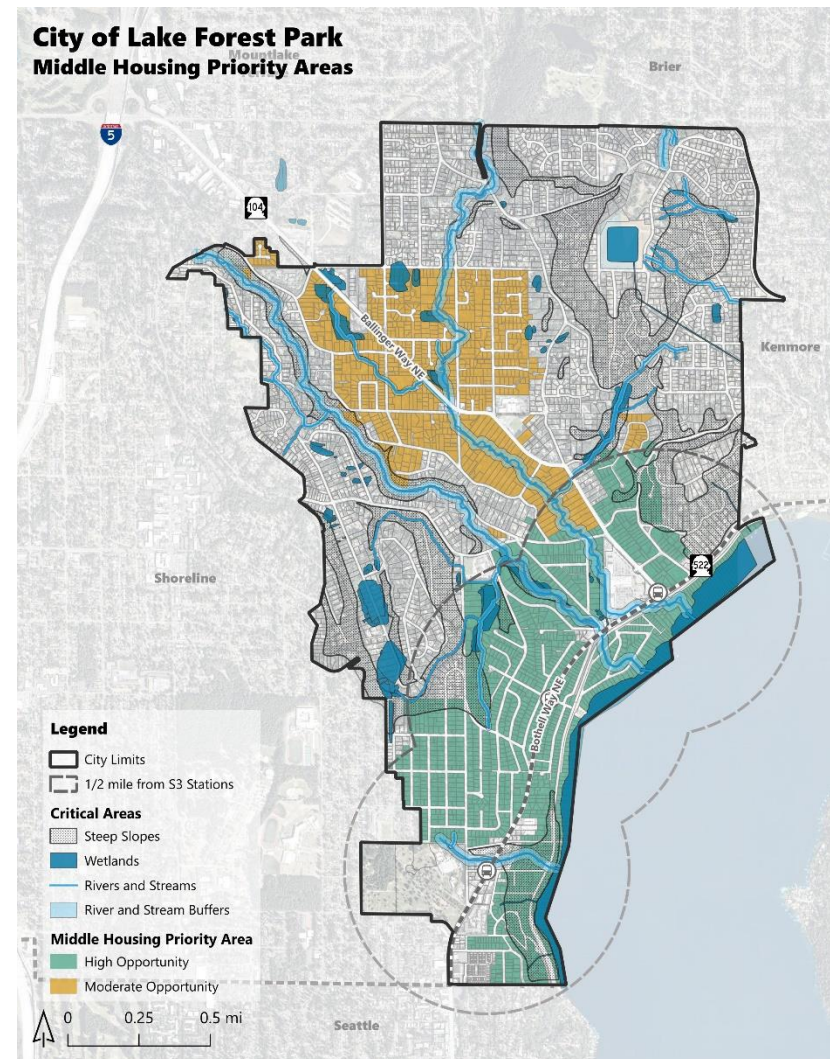
### Location

Lake Forest Park is required to allow up to two units per lot in all residential zones. However, the city may wish to allow additional middle housing types in some areas, including areas with walkability to transit and amenities, less existing tree canopy, fewer critical areas, and where parcel size and configuration are amenable to a variety of middle housing typologies.

#### Recommendation for consideration:

Consider allowing more middle housing types such as triplexes, fourplexes, sixplexes, or cottage clusters in the “High Opportunity” and potentially “Moderate Opportunity” areas shown in Figure 1. The “High Opportunity” areas comprise RS-7.2 and RS-15 zoned parcels within ½ mile of the future BRT stops, and the “Moderate Opportunity” parcels are adjacent to Ballinger Way in the RS-7.2, RS-10, and RS-15 zones.

Figure 1. Prioritized Locations for Middle Housing in Lake Forest Park



Source: City of Lake Forest Park, Leland Consulting Group

## Typologies

Lake Forest Park is required under HB 1110 to allow up to two units on all residential lots. However, the City may want to consider allowing a wider variety of housing types in targeted areas or citywide.

### Recommendation for consideration:

Increasing flexibility in zoning regulations to regulate new housing based on form and scale, rather than density or number of units, could allow a wider variety of housing types throughout the city and help Lake Forest Park meet some of its housing goals while mitigating pressure for tree removal or development in environmentally sensitive areas that more intense multi-unit housing types can bring. The City should consider allowing more than two units per lot either citywide or in targeted areas, particularly within a half-mile of transit.

## Off-Street Parking

Lake Forest Park currently requires 1.5 parking spaces per unit for multi-unit dwellings. Though many residential lots are large enough to accommodate off-street parking, existing parking ratios could impact the feasibility of middle housing.

### Recommendation for consideration:

Reducing the amount of parking required for middle housing, especially for smaller units in areas near transit or where there is adequate street parking, would help increase the feasibility of new middle housing units as well as internal conversions and ADUs.

## Building Heights

The City's residential zones allow housing up to 30 feet. While this is adequate for most middle housing types, there could be an opportunity to increase the allowed building height for middle housing to avoid conflicts between housing and critical areas.

### Recommendation for consideration:

Increasing building heights to 40 or 45 feet would allow developers to build vertically in cases where building horizontally would require either development of environmentally sensitive areas or tree removal.

## Lot coverage

The prevalence of large lots in Lake Forest Park increases the feasibility of a wide variety of middle housing types. However, current lot coverage standards are a major limiting factor.

### Recommendation for consideration:

Raising the allowed lot coverage to 50 percent would significantly increase the feasibility of middle housing especially on lots that are partially constrained by environmental factors.

## FAR Bonuses

Best practices for encouraging the construction of middle housing include creating a system of Floor Area Ratio (FAR) bonuses in which FAR increases with the number of units.

### Recommendation for consideration:

If Lake Forest Park chooses to allow more than two units per lot, it should implement the Washington Model Code's recommended FAR bonuses for Tier 1 and Tier 2 cities.

## Novel Housing Typologies

The lots in Lake Forest Park's residential zones are a wide variety of shapes and sizes, and many are constrained by critical areas, tree coverage, or other challenges. Allowing unusual housing types beyond the typologies cataloged by the Department of Commerce could improve the feasibility of housing on more challenging sites.

### Recommendations for consideration:

Lake Forest Park should ensure that its development regulations allow for unusual types and configurations of middle housing, such as side-by-side plexes or nontraditional cottage clusters.

## ADU Regulations

Current regulations for Accessory Dwelling Units in Lake Forest Park permit such buildings only in rear yards. However, many homes in Lake Forest Park are located at the rear of a lot and include long driveways with enough room to build a front or side ADU.

### Recommendations for consideration:

The City should consider allowing ADUs to be built in front and/or side yards as well as rear yards. Under HB 1337, Lake Forest Park will also be required to allow two ADUs per lot and ensure that lot coverage and setback units for ADUs are not different from primary structures.

## Lot Division

Current City regulations require 75 feet of street frontage, preventing lot divisions that would result in a small lot.

Combining flexible middle housing regulations and less stringent lot division requirements would help promote affordable homeownership opportunities.

### Recommendations for consideration:

Lake Forest Park should consider allowing the creation of smaller lots with reduced street frontage to enable affordable homeownership and wealth building opportunities on existing large lots.

## Accessibility

Despite an aging population and an increase in prevalence of multigenerational households, there is a lack of accessible housing nationwide. If Lake Forest Park chooses to allow middle housing types with four or more units, requiring some percentage of those units to be accessible (meeting ADA standards) or visitable would help reduce the accessible unit gap.

### Recommendations for consideration.

Lake Forest Park should require that some percentage of units in higher-density middle housing, such as fourplexes or townhomes, meet accessibility or visitability standards in order to improve housing access for elderly and disabled residents and their families.

## Affordable Middle Housing Incentives

Lake Forest Park has a goal of increasing opportunities for affordable homeownership citywide. Incentives or requirements for the inclusion of affordable units if more units are built in middle housing could help the City achieve this goal.

### Recommendations for consideration:

To promote opportunities for affordable homeownership, the City should partner with affordable homebuilders to understand community needs and look to establish incentives including density bonuses and/or fee waivers. This could be coupled with an affordability requirement if four or more units are built.

## Critical Areas

While HB 1110 does allow cities to exclude any lots that contain critical areas (as defined in the GMA), this broad exemption would have an outsized impact on Lake Forest Park due to the large number of constrained or partially constrained lots. Many of the partially constrained lots in Lake Forest Park are large enough that middle housing could be built relatively easily on non-constrained portions.

### Recommendations for consideration:

Lake Forest Park should follow the Commerce recommendation that middle housing be subject to the same critical areas regulations as detached single-family housing.

## Alternative Compliance Path

The Alternative Compliance Path would allow Lake Forest Park to exempt up to 25 percent of its lots from increased density requirements. However, this must be weighed against the Racially Disparate Impacts of excluding middle housing in these areas.

### Recommendations for consideration:

Because so much of Lake Forest Park had racially restrictive covenants, LCG does not recommend that Lake Forest Park pursue the Alternative Compliance Path.

# HB 1110 AND MIDDLE HOUSING



## Purpose

This section discusses the general requirements under Washington House Bill 1110 (HB 1110), which requires cities to allow for middle housing in all residential zones. It includes:

- Information specific to Lake Forest Park as a Tier 3 City
- Characteristics of different types of middle housing Lake Forest Park may consider allowing in its residential areas
- A summary of the potential benefits of middle housing, clarifying the purpose and intent of HB 1110

## Key Takeaways

- As a Tier 3 city, Lake Forest Park is required to allow at least two dwelling units per lot on all lots zoned predominantly residential.
- HB 1110 also allows cities to follow an Alternative Compliance Path, which would allow the City to exclude up to 25% of its residential parcels if they meet specific criteria, such as being located in critical areas or buffers. However, the City would be required to weigh this against Racially Disparate Impacts (RDI) and other considerations.
- The main types of middle housing include duplexes, triplexes, fourplexes, fiveplexes, sixplexes, townhouses, courtyard apartments, and cottage housing. While Lake Forest Park is only required to allow duplexes, allowing a wider variety of housing in targeted areas could promote greater housing diversity and opportunity.
- There are a wide variety of benefits associated with allowing middle housing in all residential zones. Middle housing fits well into established residential neighborhoods, promotes affordability (particularly affordable homeownership), helps to address historical patterns of segregation, and aligns with climate goals.

## HB 1110 Intent and Requirements

HB 1110 is a middle housing bill that was passed by the State Legislature in 2023, now codified in RCW 36.70A.635. It requires cities to allow middle housing (multiple units per residential lot), with specific requirements based on the population of the city. There are three population-based tiers where the requirements apply:

- **Tier 1** cities are those with at least 75,000 residents
- **Tier 2** cities are those with between 25,000 and 75,000 residents
- **Tier 3** cities are those with populations under 25,000 that are contiguous with the UGA of the largest city in the county

Based on this criteria, **Lake Forest Park is a Tier 3 city**. Tier 3 cities are required to allow two dwelling units per lot on all lots zoned predominantly residential, unless zoning already permits higher densities. This requirement is a baseline – cities can choose to allow a wider variety of housing types in their residential zones, such as fourplexes, cottage clusters, or other middle housing types. The characteristics of various middle housing types are described below.

The intent of HB 1110 is to add housing capacity to the state and region in order to combat the broader housing affordability crisis, while particularly attempting to address the harms of exclusionary land use practices that have historically been most harmful to households of color. Allowing more housing types in all residential zones can help reduce the price of entry in high-opportunity neighborhoods and address patterns of racial segregation.

## Alternative Compliance Path

Cities have the option to pursue an “Alternative to Density Requirements” compliance path for HB 1110, as outlined in RCW 36.70A.635(4). This alternative permits a city to implement the density requirements outlined above to “at least” 75 percent of parcels in the city primarily dedicated to single-family detached units, rather than to all such lots. The 25 percent (or less) of parcels excluded from the density requirement must include but are not limited to:

- Lots designated with critical areas or their buffers
- Any portion of a city within a one-mile radius of a commercial airport with at least 9,000,000 annual enplanements
- Areas subject to sea level rise, increased flooding, susceptible to wildfires, or geological hazards over the next 100 years

There are also requirements for parcels which must be included in the “at least” 75 of lots which are subject to the new density requirements. These include:

- Any areas for which the exclusion would further racially disparate impacts or result in zoning with a discriminatory effect;
- Any areas within one-half mile walking distance of a major transit stop;
- Any areas historically covered by a covenant or deed restriction excluding racial minorities from owning property or living in the area, as known to the city at the time of each comprehensive plan update.

There are also other exemptions to some HB 1110 density requirements for cities lacking infrastructure capacity (such as sewer and water) and for areas with a high risk of displacement which likely do not apply to Lake Forest Park. Further details on the alternative compliance path and relevant legislation are found in Chapter 6 of the [Commerce User Guide for HB 1110 Model Ordinances](#).

The intention of this “Alternative Compliance Path” is to allow cities to ensure preservation of critical areas and limit densification in areas subject to future hazards arising from climate change and other natural disasters, while maintaining the intention of HB 1110 to increase housing supply in single-family residential neighborhoods throughout the city. An analysis of the potential for Lake Forest Park to undertake this alternative compliance path is found later in this report starting on page 64.

## Types of Middle Housing

Under HB 1110, Tier 3 cities like Lake Forest Park are required to allow at minimum four of the nine middle housing types listed below:

- Duplexes
- Triplexes
- Fourplexes
- Fiveplexes
- Sixplexes
- Townhouses
- Stacked flats
- Courtyard apartments
- Cottage housing

Details for each of these types of middle housing are described below, however, only four of the nine types are defined in statute, and some of these types overlap. For example, a three-story stacked flat building (with one unit per floor) could also be considered a triplex. Due to this overlap, it is important cities carefully consider how to define their “plex” housing types.

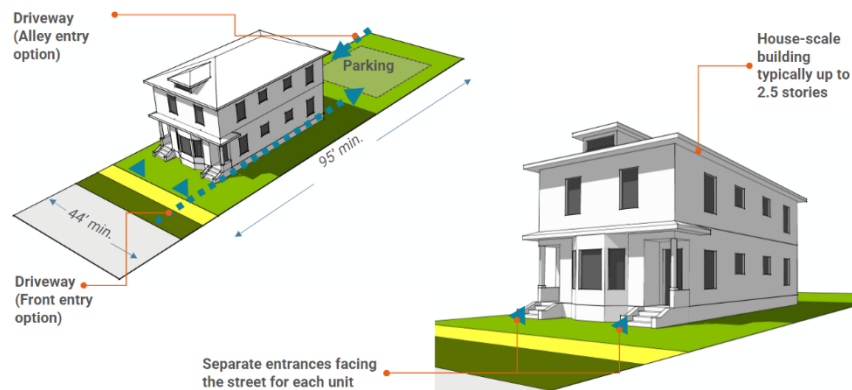
Additional information on middle housing types, including more details on the typologies and graphics shown in this section, are provided by the [WA Department of Commerce](#).

## Duplexes

Duplexes are buildings with two attached units. They are distinctive from homes with attached accessory dwelling units because the two units are typically similar in size. The units can be stacked, with one unit on the ground floor and the other on the upper floor, or side-by-side in a variety of configurations.

**Stacked duplexes** are house-scale buildings, typically up to two and a half stories, where one unit is on the ground floor and the other is above. Most commonly, stacked duplexes have two entrances facing the street, though some older stacked duplexes have a single entrance. Stacked duplexes are ideal for smaller or constrained lots because they are vertically rather than horizontally laid out. They fit well into residential neighborhoods as they have a similar appearance to larger single-family homes.

Figure 2. Typology Drawings for Stacked Duplexes



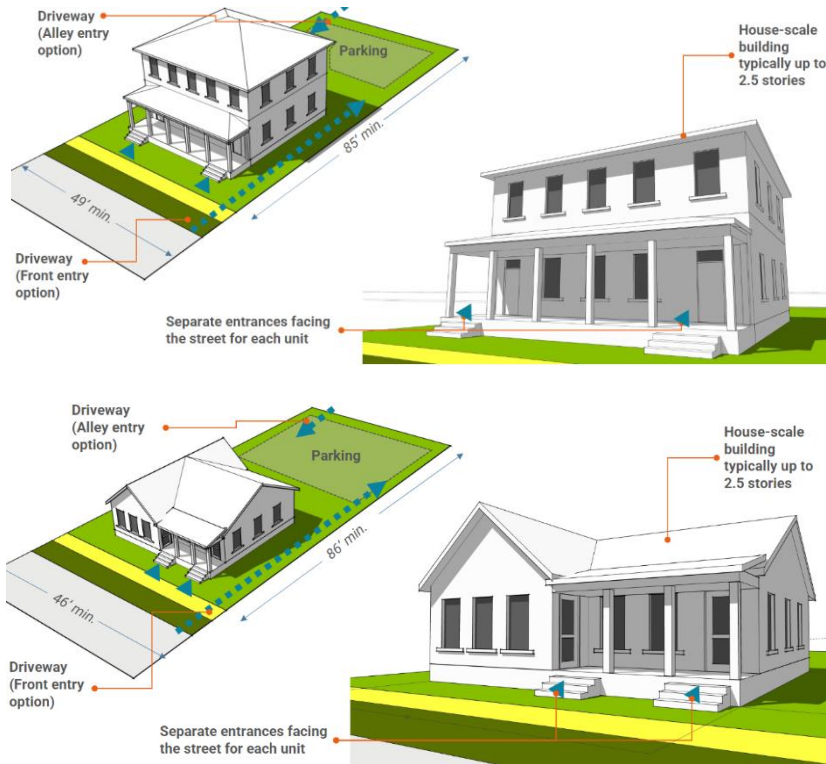
Source: Washington State Department of Commerce ([Link](#)).

Figure 3. A Stacked Duplex in the Wallingford Neighborhood of Seattle, WA



**Side-by-Side duplexes** can have a variety of layouts. They can be similar to townhouses, or they can be in smaller one- or two-story structures. Like stacked duplexes, side-by-side duplexes typically have two entrances facing the street. They also reflect the typologies of existing residential neighborhoods. Side-by-side duplexes are ideal for wider, more shallow lots.

Figure 4. Typology Drawings for Side-by-Side Duplexes



Source: Washington Department of Commerce ([Link](#))

Figure 5. A Single-Story Side-by-Side Duplex in Portland, OR (Source: Zillow ([Link](#))).



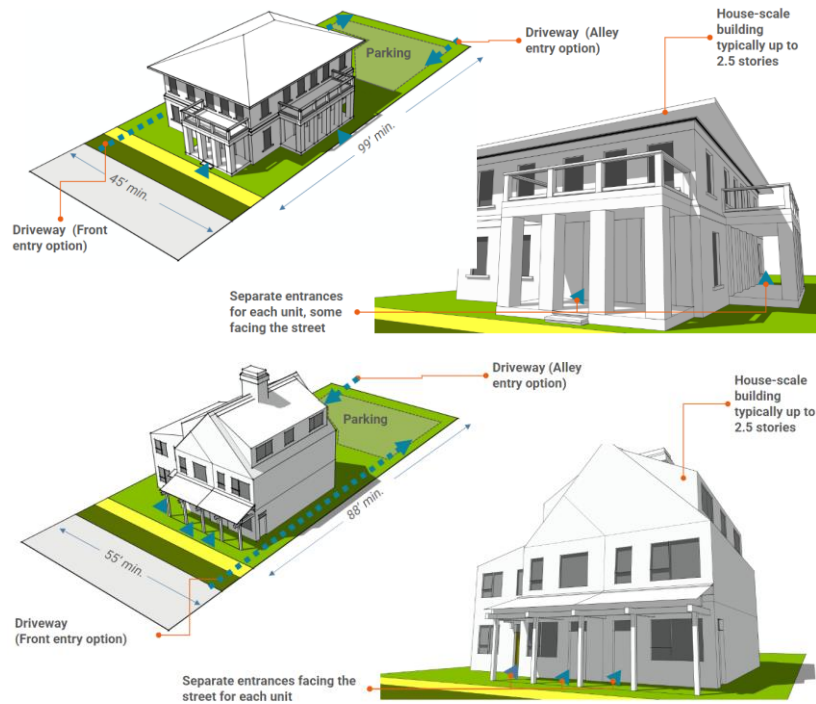
Figure 6. A Two-Story Side-by-Side Duplex in the Alberta Neighborhood of Portland, OR (Source: Sinclair Construction ([Link](#))).



## Triplexes

Triplexes are three-unit buildings that come in a variety of configurations. They are typically in structures up to two and a half stories, with entrances facing the street and/or the side of the building. Units can all be the same size, or one unit may be smaller than the other two. Like duplexes, house-scale triplexes fit well into residential neighborhoods. Depending on the configuration, they could fit either on long and narrow or wide and shallow lots.

Figure 7. Typology Drawings for Triplexes



Source: Washington Department of Commerce ([Link](#)).

Figure 8. A Triplex Building in Seattle, WA



Source: Workshop AD ([Link](#)).

## Fourplexes

Fourplexes are four-unit buildings that can be configured in a variety of ways, and can have between one and four entrances. According to the Department of Commerce, they are typically up to two and a half stories tall. Because of this, they fit well into residential neighborhoods. They can have two units per floor, or four units centered around a small forecourt. Because of the variety of configurations, fourplexes can be built on a wide range of lot types.

Figure 9. Typology Drawings for Fourplexes



Source: Washington Department of Commerce ([Link](#)).

Figure 10. A Fourplex with Three Front Entrances in the Ballard Neighborhood of Seattle, WA



Source: Apartments.com ([Link](#)).

Figure 11. A Historic Fourplex in Tacoma, WA



Source: Windermere Real Estate ([Link](#)).

Figure 12. A Newly Built Fourplex in Portland, OR



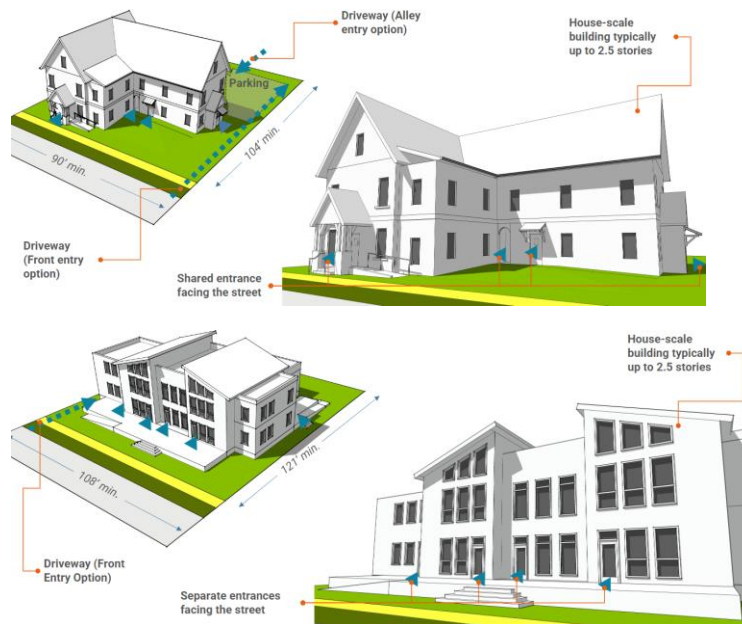
Source: Crexi ([Link](#)).



## Fiveplexes

Fiveplexes are five-unit buildings that are typically up to 2.5 stories in height, though allowing structures up to three stories can provide developers with more flexibility. Each unit generally has its own entrance, but not all entrances face the street. Fiveplexes typically require larger lots than duplexes, triplexes, and fourplexes – generally between 9,000 and 15,000 square feet. Fiveplexes are therefore a good fit for neighborhoods with larger lot sizes, and where there are fewer environmental constraints.

Figure 13. Typology Drawings for Fiveplexes



Source: Washington Department of Commerce ([Link](#)).

Figure 14. A Fiveplex in the Fremont Neighborhood of Seattle, WA



Source: Zillow ([Link](#)).

Figure 15. A Fiveplex in the Eastlake Neighborhood of Seattle, WA

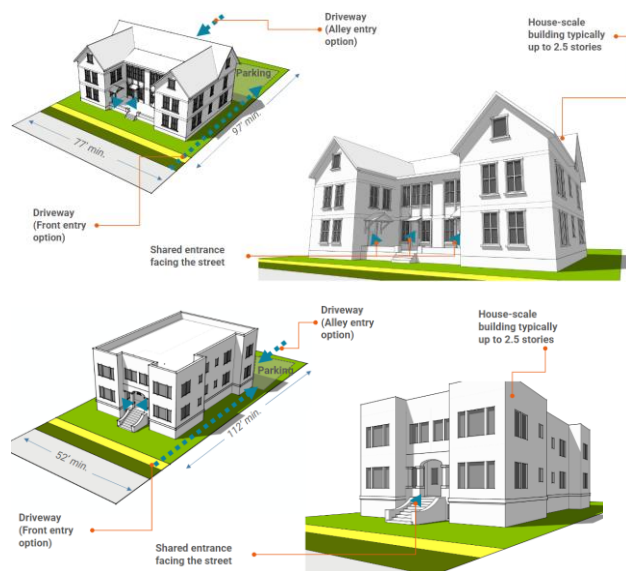


Source: CoStar.

## Sixplexes

Sixplexes are structures with six units, typically two and a half stories in height. Like fiveplexes, sixplexes can benefit from the flexibility of allowing three stories. Three-story sixplexes typically have two units per floor. Sixplex configurations typically include shared entrances, which can be situated around a small forecourt. Sixplexes can have three units on each floor or a variety of unit types and sizes within the building. Sixplexes can be built on slightly smaller lots than fiveplexes. They are ideal for neighborhoods near transit and amenities. The City of Portland recently legalized a style of sixplex called “side by side” that allows entrances on the side of the building. This accommodates sixplex structures on lots that are narrow but deep.

Figure 16. Typology Drawings for Sixplexes



Source: Washington Department of Commerce ([Link](#)).

Figure 17. A Sixplex Building in the West Woodland Neighborhood of Seattle, WA



Source: CoStar.

Figure 18. The 22 Monroe Sixplex in the Eliot Neighborhood in Portland, OR



Source: CoStar.

Figure 19. A Side-by-Side Sixplex in the Lents Neighborhood of Portland, OR

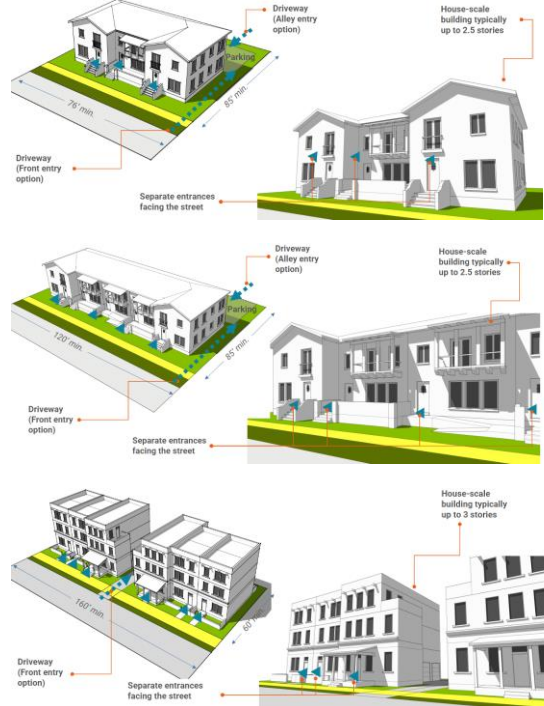


Source: CoStar.

## Townhouses

Townhouses (or townhomes) typically consist of individual units with their own entrances (usually facing the street) and attached walls. They are typically suitable for lots that are wide but not necessarily deep. Because townhouses may be individually platted, they can also be built on adjoining lots. Townhouses can range from two to four stories and can be arranged in one structure or multiple. Townhouse structures can consist of two or more units. Because of this flexibility, townhouses are suitable in most places.

Figure 20. Typology Drawings for Townhouses



Source: Washington Department of Commerce ([Link](#)).

Figure 21. Townhouses in Everett, WA



Source: CoStar.

Figure 22. Park Central Townhouses in Bellevue, WA



Source: CoStar.

Figure 23. Rainier View Townhouses in Burien, WA



Source: CoStar.

Figure 24. Townhouses in Troutdale, OR

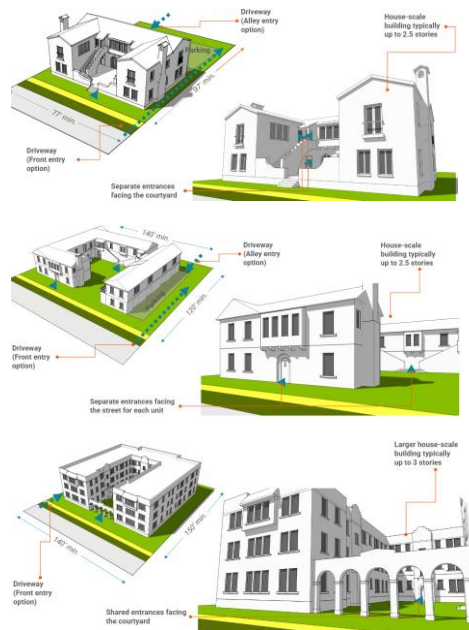


Source: CoStar.

## Courtyard Apartments

Courtyard Apartments are detached or attached house-scale buildings with six or more units, where the unit entrances are off of a central courtyard. These apartments are typically in structures that are either two and a half or three stories tall. Larger courtyard buildings are typically built at a greater scale than other middle housing types. Depending on the configuration, courtyard apartments can be on a variety of lot types. However, they are more suited to larger, less constricted lots. Many of the existing courtyard apartment buildings in the Seattle area are older, historic buildings.

Figure 25. Typology Drawings for Courtyard Apartments



Source: Washington Department of Commerce ([Link](#)).

Figure 26. The Devonshire Building in the Belltown Neighborhood of Seattle, WA



Source: Community Roots Housing ([Link](#)).

Figure 27. Courtyard Apartments in the Concordia Neighborhood of Portland, OR



Source: Zillow ([Link](#)).

Figure 28. Courtyard Housing in the Irvington Neighborhood of Portland, OR



Source: Zillow ([Link](#)).

## Cottage Housing

Cottage Housing, also called Cottage Clusters, is a type of middle housing that typically has around six units of detached housing. Each unit is a small home, generally up to one and a half stories tall. Some cottage housing also includes some attached units, like small duplexes. The units are generally organized around a shared open court and are visible from the street. The primary difference between cottage housing and courtyard apartments is that cottage housing includes multiple structures. Cottage housing typically requires larger (at least 12,600 SF), less constrained lots. However, cottage housing is a particularly flexible typology that can also fit on more unusually shaped lots with structures oriented around existing trees or other constraints.

Figure 29. Typology Drawings for Cottage Housing



Source: Washington Department of Commerce ([Link](#)).

Figure 30. Cully Green Cohousing in the Cully Neighborhood of Portland, OR



Source: Communitecture ([Link](#)).

Figure 31. The Southard Development in Tukwila, WA



Source: The Southard ([Link](#)).

Figure 32. Greenwood Avenue Cottages in Shoreline, WA



Source: The Cottage Journal ([Link](#)).

## Benefits of Middle Housing

Middle housing can have several advantages, including:

- Their appearance and scale typically fit well in residential neighborhoods.
- They add “gentle density” in areas that may not be ideal for large apartment buildings, either because of a lack of buildable land or because of existing infrastructure challenges.
- Middle housing units tend to be smaller, making them more affordable than traditional single-family homes without the need for public subsidy.
- Middle housing units can be renter-occupied, reducing the cost of entry into high-opportunity single-family neighborhoods.
- Increasing the diversity of housing types provides opportunities for moderate-income workers like teachers and firefighters to live in the communities they serve.
- Adding middle housing to residential neighborhoods can help address historical patterns of segregation across cities and regions.
- Denser housing in infill neighborhoods, as opposed to greenfield construction, promotes climate resilience by reducing greenhouse gas emissions and protecting critical environmental areas.

In Lake Forest Park, middle housing could have also the benefit of leaving more environmentally sensitive areas underdeveloped without restricting housing supply, increasing resilience by adding more housing on lots or portions of lots that are not environmentally constrained by slopes and wetlands.

## Strategies for Affordable Homeownership

Allowing a diverse array of middle housing types presents opportunities for more affordable homeownership. Middle housing units are typically smaller than traditional single-family homes, and new units sell for less. Middle housing also helps increase the housing supply, taking some pressure off of rising home prices. By offering a variety of housing – including townhouses, flats, and cottage clusters – Lake Forest Park will help meet the needs of more homeowners.

In addition, nonprofit organizations like Habitat for Humanity as well as local Community Land Trusts (CLT) throughout the Pacific Northwest have embraced middle housing as an opportunity to provide more regulated affordable homeownership opportunities. In Portland, advocacy from Habitat for Humanity and local CLT Proud Ground advocated for an affordability bonus that lets developers build six units on a lot if half are affordable.

Lake Forest Park should consider the following strategies to increase opportunities for more affordable homeownership:

- **Partner with affordable homebuilders** and community land trusts to better understand the needs of the communities they serve and ensure that development regulations allow for these types of housing.
- **Incentivize affordable housing development** through density bonuses, fee waivers, or other programs.
- **Offer opportunities for fee-simple lot splitting** to increase wealth building opportunities.
- **Establish a funding source**, such as an affordable housing trust fund, to support local affordable housing construction through direct subsidies or land purchases.

## Partner with Affordable Homebuilders

Affordable homebuilders, including nonprofits and community land trusts, are experts in the feasibility of the types of properties they develop, as well as the subsidies potentially available for different product types. They are also in regular contact with the communities that would benefit from more affordable homeownership opportunities. Working closely with these organizations will give the City a better understanding of local needs, as well as what actions it can take to meet those needs. The City can then take the information gleaned from conversations with these organizations to ensure that the City Code enables the types of housing that reflect both community needs and economic realities.

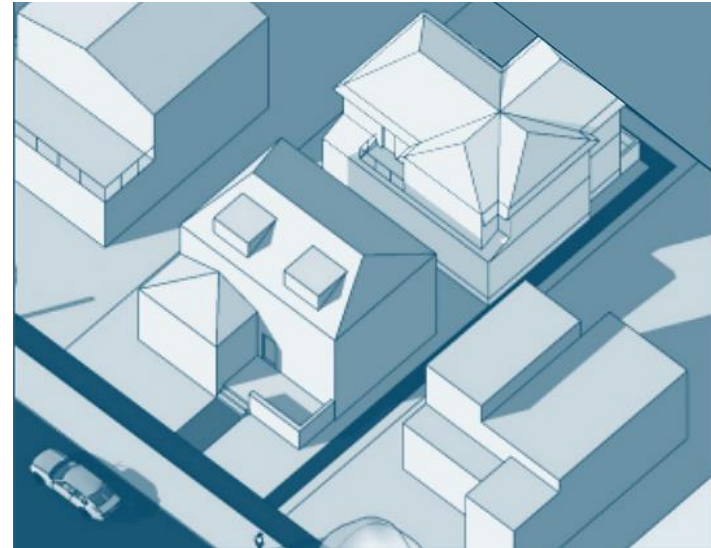
## Incentivize Affordable Housing Development

The City has an opportunity to create incentive programs for affordable housing directly within its middle housing code. This can be in the form of bonuses – extra units or additional height if a development includes some number of affordable units – or financial incentives like waivers for System Development Charges (SDCs) or permitting fees. The partnerships the City forms with affordable housing developers will be crucial to adequately calibrating these bonuses. If the bonuses are not sufficient to make affordable housing construction feasible, the City will not get any new affordable homeownership units through its middle housing program.

## Enable Fee-Simple Lot Splitting

Recent changes to Portland’s Residential Infill Project (RIP) allow for a new type of housing called “detached duplexes” along with fee simple lot splitting. This allows homeowners on larger lots to build a detached unit larger than what would typically be allowed for an ADU and then split the lot to sell the second unit and associated land to a buyer. This enables wealth building opportunities for existing homeowners through the sale of part of their lot as well as affordable homeownership opportunities. Currently, however, Lake Forest Park’s Municipal Code requires that lot sizes and shapes must be consistent with zoning regulations, and lots must have 75 feet of frontage on the right of way. This would make it extremely difficult to increase homeownership options, even on larger lots. The State Legislature recently attempted to pass HB 1245, which would have required cities to allow lot splitting and the creation of new lots as small as 2,000 square feet. Although this law did not pass, it serves as a potential model for Lake Forest Park.

Figure 33. Rendering of a Detached Duplex



Source: Portland Bureau of Planning & Sustainability ([Link](#)).

## Establish an Affordable Homeownership Funding Source

The construction of affordable homeownership units is typically undertaken by nonprofits such as Community Land Trusts rather than by city governments. However, many funding sources are targeted to larger affordable housing projects, especially rental apartments. To support the affordable homebuilders interested in developing new housing in Lake Forest Park, the City should consider creating a new funding source like a Housing Trust Fund that can either directly fund affordable housing or fund the purchase of land that the City can then turn over to a nonprofit organization for development.



# LAKE FOREST PARK NEIGHBORHOOD CHARACTERISTICS

## Purpose

This section discusses the potential for the development of the middle housing types outlined in the previous section in Lake Forest Park's residential areas. The city's neighborhoods are first grouped by zone and similar site characteristics and analyzed at a high level, followed by a profile of existing Middle Housing units in the city. Then, five representative areas with differing parcel sizes, configurations, and constraints are analyzed to determine the potential for middle housing types in the city's varying neighborhood areas.

## Key Takeaways

- Lake Forest Park's five RS zones make up 96 percent of total parcel acreage in the city. These zones allow single family dwellings, ADUs, and manufactured housing but do not currently allow for duplexes or other middle housing types.
- To analyze the feasibility of middle housing in these five residential zones, LCG categorized different areas of the city by zone, location, and environmental constraints. Lake Forest Park's RS 10 and RS 15 zones have a particularly high share of environmentally constrained parcels. The RS 10, RS 15, and RS 20 zones also have a higher share of parcels that are below the minimum lot size required by Lake Forest Park's zoning code.
- The neighborhoods along Bothell Way NE and Ballinger Way NE are the most walkable areas of the city. These neighborhoods should be considered potential targets for higher-density middle housing types.
- Lake Forest Park's municipal code includes a Reasonable Economic Use Exemption that enables some low intensity building on lots that are fully constrained by critical areas and buffers. Depending on the middle housing strategy the City chooses to pursue, it should consider allowing small duplexes or other middle housing types through this process.
- There are currently 22 middle housing units located in Lake Forest Park's single-family zones, despite not being allowed under current zoning regulations. These middle housing units fit in with the surrounding residential form and scale and offer examples of how middle housing could look in the future.
- LCG analyzed existing parcels in five different areas of Lake Forest Park to determine what could be built on lots of various sizes and with differing environmental constraints. Due to the large size of many city lots, a wide variety of housing types could fit in the city's residential neighborhoods.

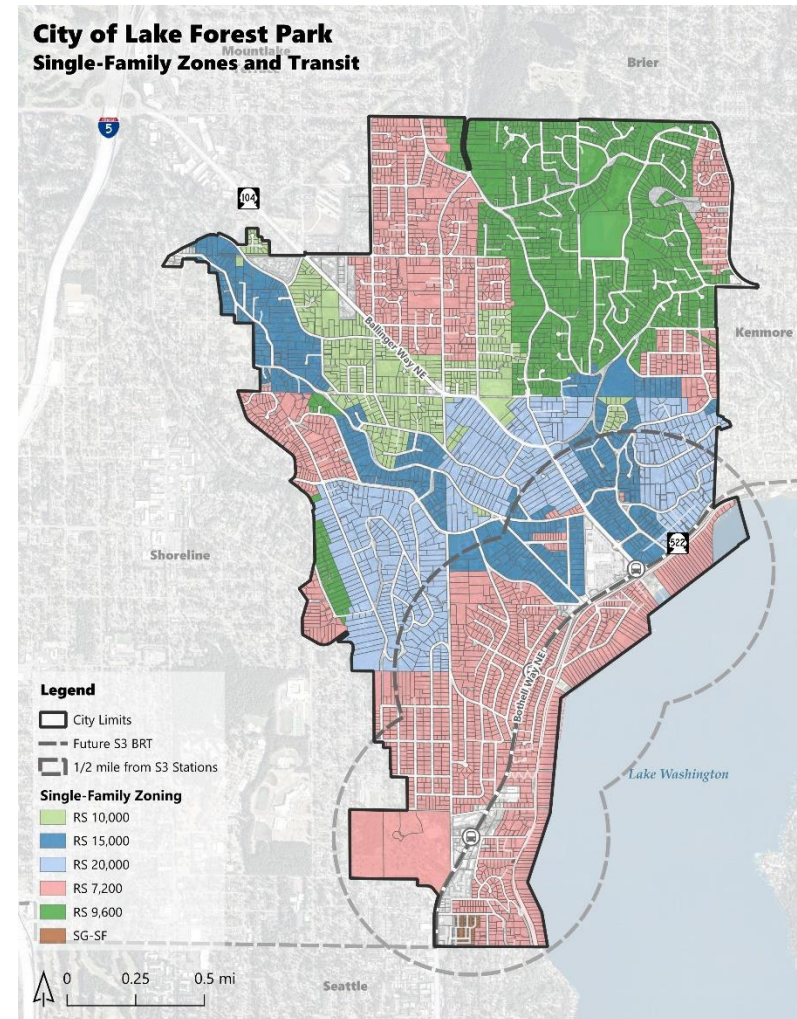
## Lake Forest Park's Residential Zones

Lake Forest Park's zoning code currently contains five single-family residential zones (RS 20, 15, 10, 9.6, and 7.2), making up 96 percent of the city's parcel acreage. The minimum lot sizes in these zones range from 20,000 square feet (RS-20) down to 7,200 square feet (RS-7.2). All five zones currently permit the same uses, per Chapter 18 of the Lake Forest Park Municipal Code:

- Single-family dwellings
- Home occupations
- Accessory buildings and structures, including ADUs<sup>1</sup>
- Manufactured housing
- Signs
- Type 1 day care facilities

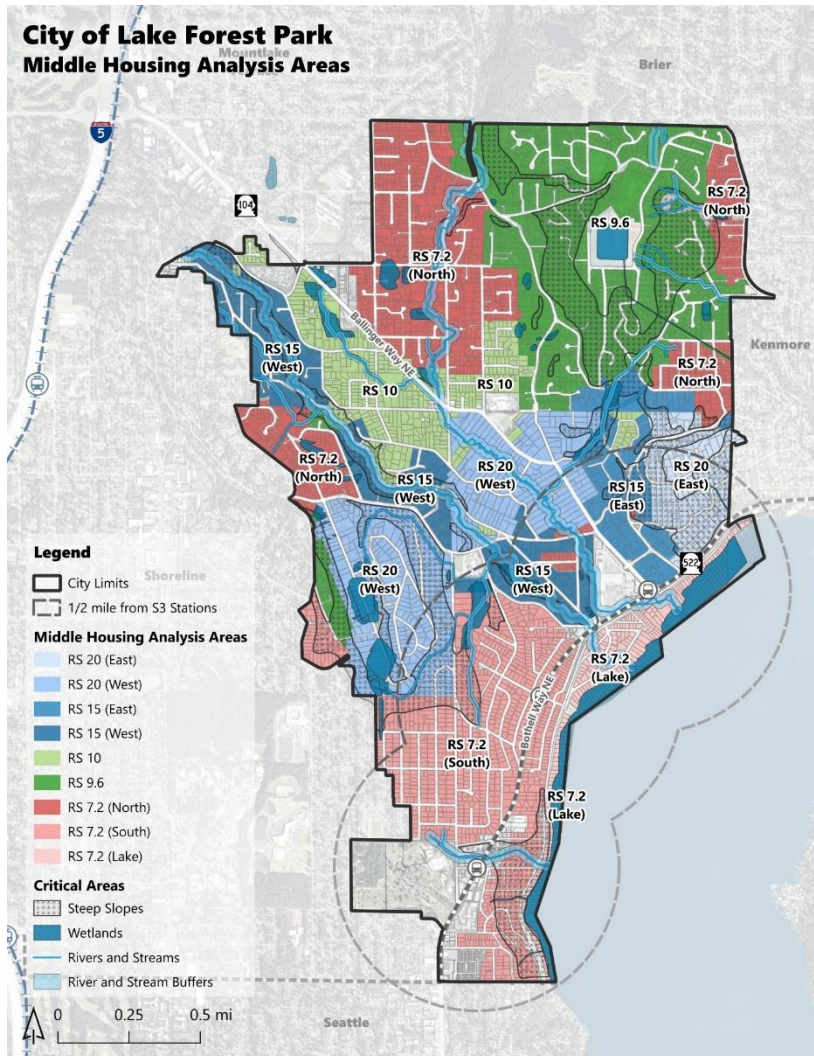
These zones are spread throughout Lake Forest Park with lot sizes roughly corresponding to various geographic and environmental constraints, with larger lots in areas containing wetlands, creeks, and steep slopes, and smaller lots in relatively flatter parts of the city. For this analysis, the RS-20, RS-15, and RS-7.2 zones were broken down into sub-areas based on their geographic distribution in the city to reflect different characteristics present with those zones. Figure 34 below shows these middle housing analysis areas in Lake Forest Park, along with critical areas likely to constrain development – steep slopes, wetlands, streams, and their buffers.

<sup>1</sup> Per LFPMC 18.50.050, there are various restrictions on ADUs, including a provision that new detached ADUs must be on lots of 10,000 square feet or more, owner occupancy requirements, and other



provisions which will be preempted by HB 1337 (2021). Revised ADU regulations will need to take effect by June 30, 2025 for compliance with the GMA.

Figure 34. Lake Forest Park Residential Zones and Middle Housing Analysis Areas



- The **RS-20 (West)** and **RS-15 (West)** areas are very deep lots which back up onto creeks and have significant sloped areas.
- The **RS-20 (East)** parcels are also sloped, but without the significant stream constraints.
- The **RS-15 (East)** cluster is more uniform in size and layout, without creek areas.
- The **RS-10** zone has relatively uniform lots, and several smaller stream areas.
- The **RS-9.6** zone is found in the north of the city, and contains significant areas with steep slopes, and a more suburban road network and layout with numerous cul-de-sacs and few through roads.
- The **RS-7.2 (North)** clusters are similar to the RS-9.6, with typical subdivision layouts though fewer sloped areas than found in the RS-9.6 zone.
- The southern part of the city has two areas of RS-7.2 zoning, a large, relatively flat area in the southwest (**RS-7.2 (South)**) with a more conventional street grid network, and a narrow area adjacent to Lake Washington (**RS-7.2 (Lake)**), with lakefront properties and some irregular neighborhood layouts near the Town Center where some existing ADUs and middle housing have been observed.

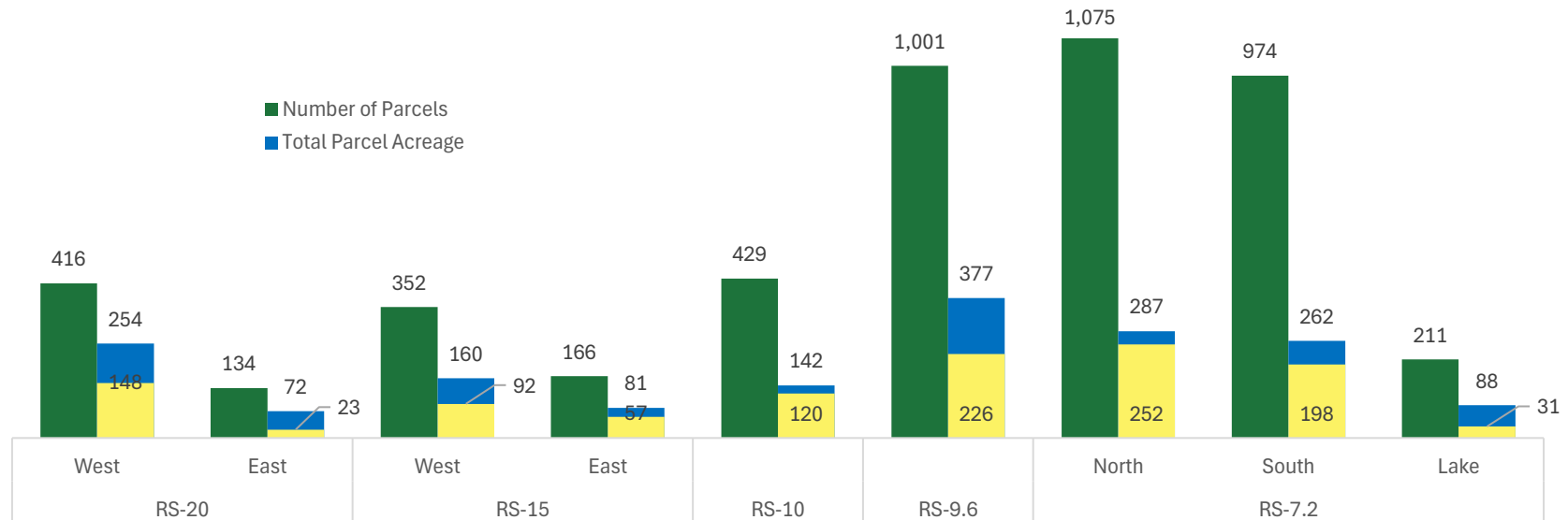
Source: City of Lake Forest Park, King County, Leland Consulting Group

## Parcel Acreage and Critical Areas

Figure 35 below shows the total number of parcels in each middle housing analysis area as well as the total acreage (in blue) and acreage outside of critical areas (in yellow). The steep slopes, streams, buffers, and wetlands used in this analysis do not represent completely undevelopable areas, since Lake Forest Park allows some development in these areas through reasonable use exemptions. Nonetheless, the acreage shown below gives an idea of the most likely and administratively straightforward development area in each analysis area.

The larger RS-20 and RS-15 zones contain very little acreage outside of critical areas, particularly in the RS-15 West area along the creek, and the highly sloped RS-20 East area. The RS-10 zone is relatively unconstrained, as are the RS-7.2 North and South areas. More than half of the RS-9.6 zone is constrained, primarily by steep slopes, and much of the parcel acreage in the RS-7.2 Lake area is at or beyond the shoreline and therefore unbuildable.

Figure 35. Parcels and Acres in Middle Housing Analysis Areas



Source: City of Lake Forest Park, King County, Leland Consulting Group

The table below in Figure 36 shows details on the acreage and percentage of each type of environmental constraint in the analysis areas. Note that due to overlapping streams, wetlands, and steep slopes, the total constrained area is typically smaller than the sum of all the individual critical areas.

Figure 36. Critical Areas Detail in Middle Housing Analysis Areas

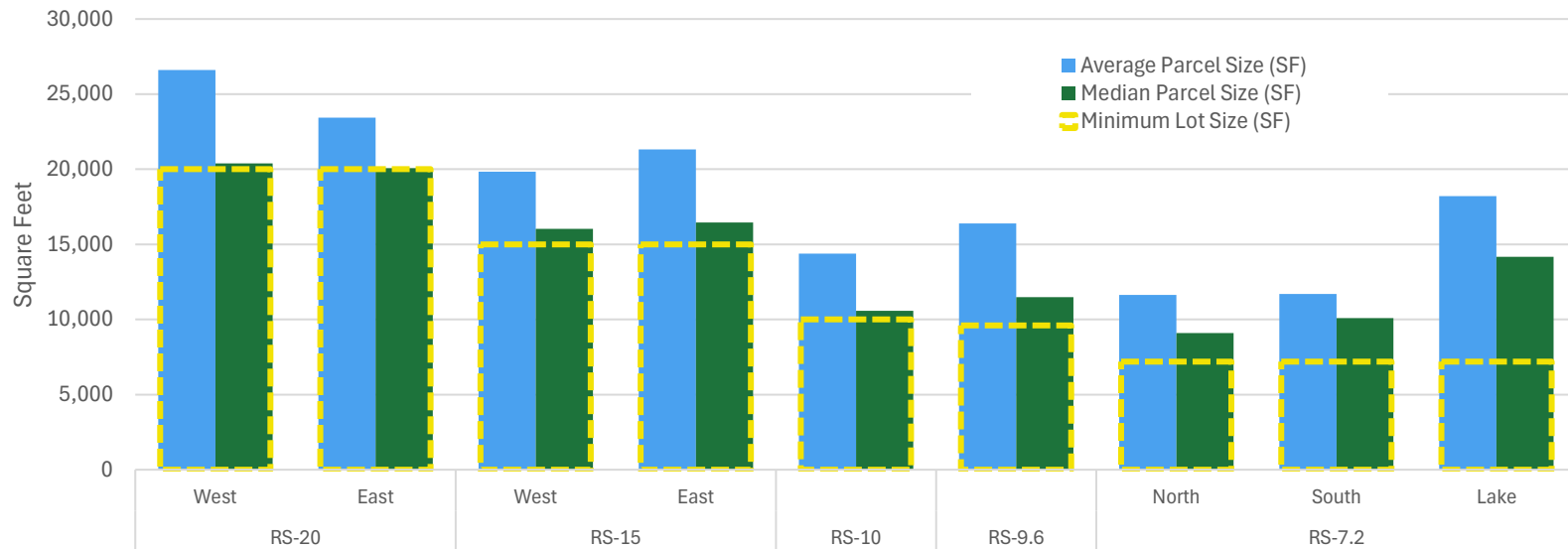
	RS-20		RS-15		RS-10	RS-9.6	RS-7.2		
	West	East	West	East			North	South	Lake
Stream Buffer (Ac)	28.8	0.0	50.5	1.9	13.0	21.4	22.7	10.8	10.2
% Stream Buffer Area	11%	0%	32%	2%	9%	6%	8%	4%	12%
Wetland (Ac)	20.1	0.3	11.9	2.3	9.8	5.8	10.6	7.5	45.0
% Wetlands	8%	0%	7%	3%	7%	2%	4%	3%	51%
Steep Slope (Ac)	67.8	49.4	42.1	23.0	5.1	131.6	6.6	54.7	5.2
% Steep Slopes	27%	69%	26%	28%	4%	35%	2%	21%	6%
Total Constrained Area	106.2	49.4	68.5	24.2	21.9	150.4	35.7	63.7	57.3
% Constrained	42%	69%	43%	30%	15%	40%	12%	24%	65%

Source: City of Lake Forest Park, King County, Leland Consulting Group

### Existing Nonconforming Parcels

The chart below in Figure 37 shows the relationship between the zoned minimum lot size and the actual parcel sizes in the analysis areas. Both average and median parcel size are shown, since the presence of a few large parcels can significantly influence the average size. In most of the analysis areas, the median parcel size is similar or slightly larger than the minimum lot size. As the minimum lot size decreases, there are more larger lots, as seen in RS-7.2 South and Lake areas (although some of the parcel acreage in the Lake area is water). The disparity between the median and average lot sizes indicates that there are likely some very large lots which are either unbuildable or have the potential to be subdivided. Overall, however, the achieved lot sizes confirm relatively closely with the zoned lot sizes in most of Lake Forest Park’s residential areas.

Figure 37. Parcel Sizes in Middle Housing Analysis Areas (Source: City of Lake Forest Park, King County, Leland Consulting Group)



Although the median lot sizes in the analysis zones are typically larger than the minimum allowed lot size under current zoning, there are also nonconforming lots in the city which are smaller than the zoned minimum size. Figure 38 below shows the percentage of parcels in each analysis area which are smaller than the minimum lot size. If a current parcel were being subdivided, these lots would not be allowed. Zones with larger minimum lot sizes have more nonconforming small lots as shown, likely reflecting the intention of the zoning code to discourage further development in those areas in the RS-20 and 15 zones with more significant environmental constraints from slopes and creeks. The smaller zones have fewer nonconforming lots, particularly the RS 7.2 South area, which is platted on a more traditional grid pattern with very uniform lots.

Figure 38. Share of Parcels Under Minimum Lot Size by Middle Housing Analysis Area

Source: City of Lake Forest Park, King County, Leland Consulting Group

In addition to lot size, there are current limitations on lot coverage – the percentage of the parcel area that can be covered by buildings. The maximum lot coverage by zone is shown at right in **Error! Reference source not found.** In all the residential zones together, about 6 percent of lots contain buildings that exceed the maximum lot coverage. In most of the analysis areas, the share of lots is around 5 percent, but the RS-7.2 South and Lake areas have about 10 and 15 percent of lots, respectively, where the built square footage exceeds the maximum allowed lot coverage of 35 percent, as shown below in **Error! Reference source not found.** with a detail map of those areas in



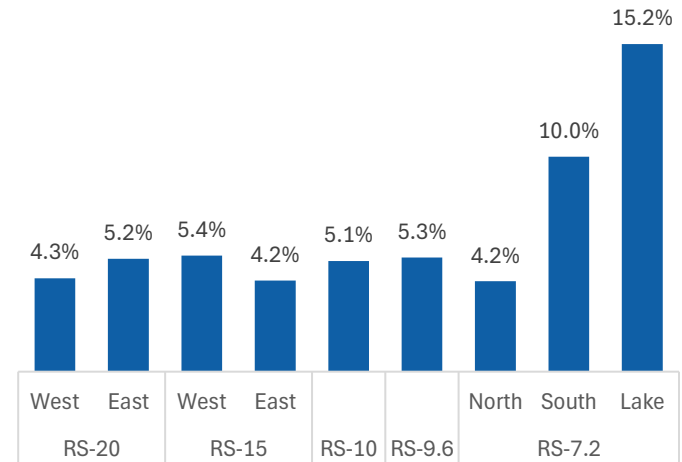
Figure 40. The existence of these numerous nonconforming uses suggests that this minimum lot size may be overly restrictive compared with development patterns already being seen in Lake Forest Park.

Figure 38. Maximum Lot Coverage by Zone

<b>RS-20</b>	<b>25%</b>
<b>RS-15</b>	<b>27.5%</b>
<b>RS-10</b>	<b>30%</b>
<b>RS-9.6</b>	<b>30%</b>
<b>RS-7.2</b>	<b>35%</b>

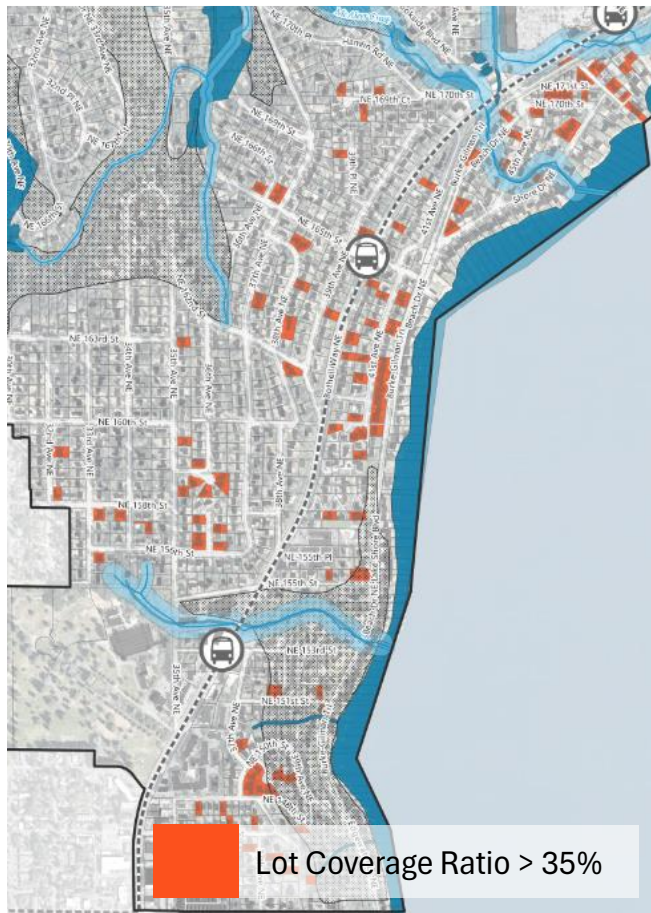
Source: City of Lake Forest Park, King County, Leland Consulting Group

Figure 39. Percentage of Lots Exceeding Maximum Lot Coverage by Analysis Area



Source: City of Lake Forest Park, King County, Leland Consulting Group

Figure 40. RS-7.5 Detail Map



Source: City of Lake Forest Park, King County, Leland Consulting Group

## Walkability

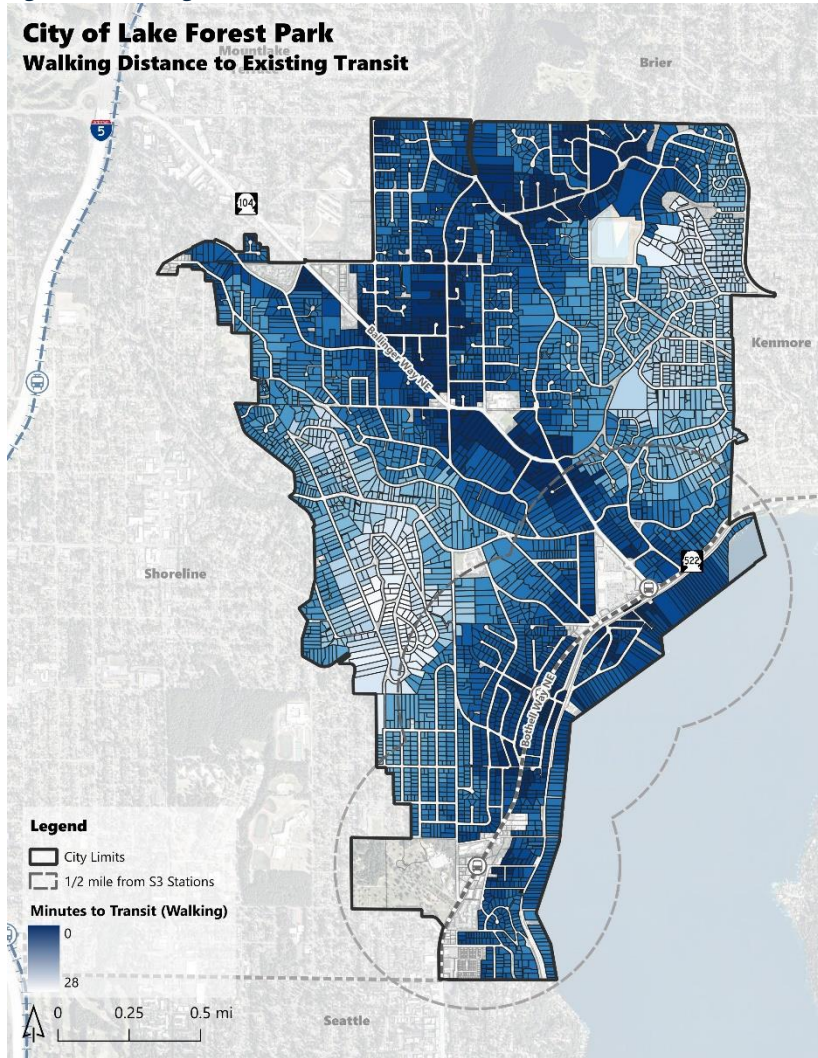
When considering potential locations for middle housing, one important factor to consider is non-motorized access to employment and transit.

Encouraging middle housing and increased density in areas with good walkability can improve health and quality of life, help reduce automobile dependence and associated greenhouse gas emissions, reduce the demand for parking spaces, and improve community. The maps below show walking distance (in minutes) to the nearest transit stop and nearest retail land use.

Similar patterns emerge in both analyses, with the hilly RS-20 West area near the border with Shoreline showing the least pedestrian accessibility to amenities and transit. The east side of the city also shows relatively long walking times to transit, and the northeast corner is relatively inaccessible to retail and amenities.

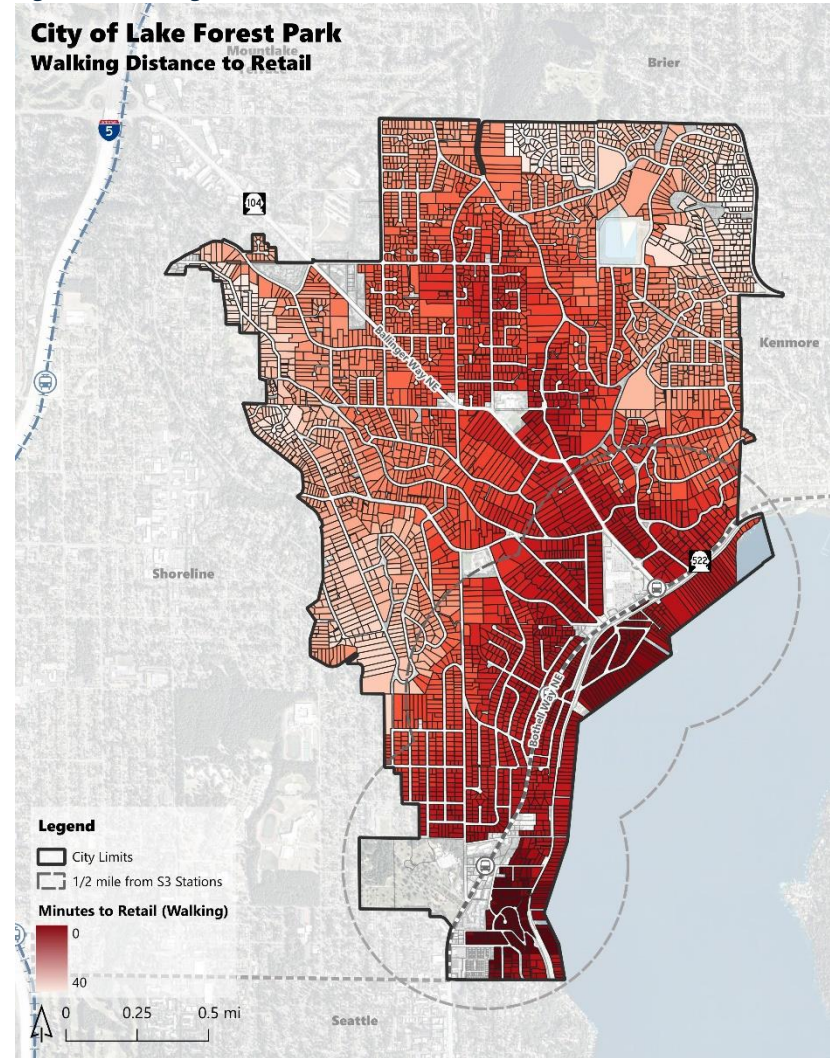
On the other hand, the areas near the Town Center, adjacent to Bothell Way and to the Burke-Gilman Trail, and in the south of the city near the border with Seattle show high pedestrian access to retail amenities, and the Ballinger Way corridor also shows proximity to current transit service. The S3 Bus Rapid Transit (BRT) line will be opening near the end of this comprehensive planning horizon, and the route, proposed station locations, and as ½ mile buffer around those stations are also shown. When that service opens, the neighborhoods in the southern part of the city (the RS-7.2 South and Lake areas in particular, as well as the Town Center), will have increased access to higher-capacity and more frequent transit service.

Figure 41. Walking Distance to Transit



Source: Urban Footprint, Leland Consulting Group

Figure 42. Walking Distance to Retail



Source: Urban Footprint, Leland Consulting Group

## Reasonable Economic Use Exemption

In Lake Forest Park's critical areas and their buffers, alteration or development of structures is typically prohibited. However, to prevent the unconstitutional taking of property rights, the City's municipal code allows property owners to apply for an exception to critical area regulations (16.16.250). Case law related to the [takings clause](#) in the Fifth Amendment has established that economic use of one dollar is sufficient to prove that a taking did not take place and the property owner is not owed compensation.

The reasonable economic use exemption allows for single family dwellings with footprints no greater than 750 square feet and gross floor area of no more than 1,500 square feet, though an additional attached garage of 250 square feet is permitted.

Property owners interested in pursuing a reasonable economic use exemption apply to the planning department, which forwards the application to the hearing examiner for a decision. The criteria for approval include:

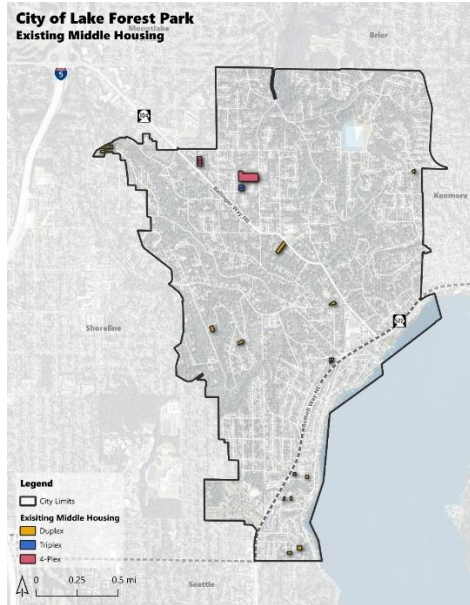
- Application of critical area regulations deny all reasonable economic use of the property
- There is no other reasonable economic use with less impact
- There is no unreasonable threat to public health, safety, or welfare
- Alterations are the minimum necessary to allow for economic use
- The inability to derive economic use is not due to actions of the current or previous property owner

Because of the size limits and minimum impact requirements, it is unlikely that middle housing would be granted an economic use exemption. However, the City could potentially choose to allow a small duplex with a footprint no greater than 1,000 square feet (the equivalent of a home with a 750 square foot footprint and 250 square foot attached garage) through this exemption. Duplexes do not have a substantially greater environmental impact than single family homes, and a 1,500 to 2,000 SF duplex could accommodate modest one- to two-bedroom units. Because exemptions are at the discretion of a hearing officer, the City would retain control over the process and ensure that development is within an acceptable threshold.

## Existing Middle Housing

According to King County Assessor data, there are 65 units of existing middle housing in Lake Forest Park, in the form of duplexes, triplexes, and 4-plexes. These housing types, as well as apartments, townhouses, co-ops, and condominiums are currently allowed in Lake Forest Park's multifamily zones (RM 3600, 2400, 1900, and 900). These multifamily zones contain 43 of the 65 middle housing units, but 22 units are nonconforming uses in the city's RS-9.6 and RS-7.2 zones. The map below in Figure 43 shows the locations of duplexes, triplexes, and 4-plexes according to the most recent King County Assessor data.

Figure 43. Existing Middle Housing in Lake Forest Park



Source: King County Assessor, King County GIS, Leland Consulting Group

Some examples of these units in the RM and RS zones are shown in the figures below. The duplexes and triplex in the RS-7.2 zone in particular demonstrate existing middle housing in the city which blends in architecturally with surrounding buildings and retains a similar scale to adjacent single-family uses.

Figure 44. Duplexes in RM 3600 Zone



Source: Google Maps

Figure 45. Duplex in RS-7.2 Zone



Source: Google Maps

Figure 46. Duplex in RS-7.2 Zone



Source: Google Maps

Figure 47. Triplex in RS-7.2 Zone



Source: Google Maps

## Example Parcels in Residential Neighborhoods

LCG analyzed five sites in residential zones throughout the city to understand what types of middle housing would be most suitable given lot dimensions and environmental constraints. Common environmental constraints in Lake Forest Park include wetlands, streams, steep slopes, and buffers. Lake Forest Park also has a variety of non-standard parcel shapes that could potentially impact what could be built on a given site.

### Site 1: RS 9.6 Cul De Sac

The first site is a cul-de-sac in the RS 9.6 zone near the northern border of Lake Forest Park. The cul-de-sac lots have non-standard shapes, and each lot currently has a single-family home on site. The lots shown in Figure 48 below are not constrained by major environmental factors. The two lots highlighted in dashed red lines are the sample parcels used in this analysis. The structure on the 9,800 square foot lot takes up approximately 29% of the land area, while the structure on the 12,100 square foot lot takes up 26% of the land area.

Figure 48. Site 1: RS 9.6 Cul De Sac

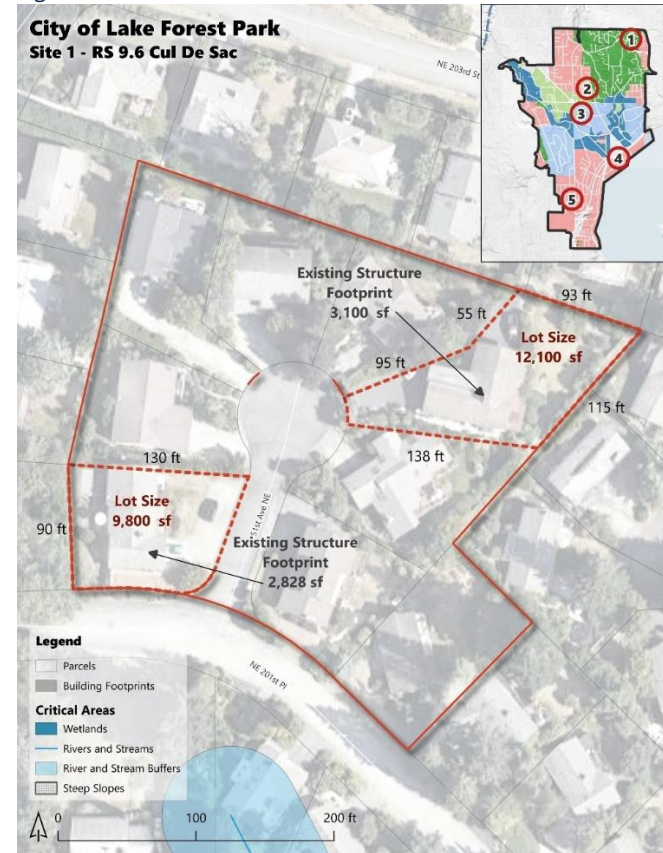


Figure 49. Street View of 51<sup>st</sup> Avenue NE from NE 201<sup>st</sup> Place



Figure 50. Aerial View of the Cul-de-Sac on 51<sup>st</sup> Avenue NE



Source: Google Maps.

Because of the shape of the existing structure on the 9,800 square foot lot, it is unlikely that an additional structure (such as an ADU) could be built on site. However, an ADU would likely be feasible on the rear portion of the 12,100 square foot lot. Because of the narrow width of the street-facing portion of the 12,100 square foot lot, setbacks could potentially need to be adjusted to allow for middle housing toward the rear of the lot.

	<b>9,800 Square Foot Lot</b>	<b>12,100 Square Foot Lot</b>
<b>Infill Opportunities</b>	Internal Conversion	Backyard ADU Internal Conversion
<b>Redevelopment Opportunities</b>	Duplex (side by side or stacked) Triplex Fourplex Fiveplex Sixplex Townhouse (up to 3) Courtyard Building	Duplex (stacked) Triplex Fourplex Fiveplex Sixplex Courtyard Building



## Site 2: RS 10 Grid North

The RS 10 zoned site in Figure 51 below is located at NE 189<sup>th</sup> Place and 37<sup>th</sup> Avenue NE. As in the previous example, these lots are not constrained by major environmental factors. However, there are a significant number of large trees on this site. The lots are a more regular rectangular shape than the lots on the Cul de Sac site. The two lots highlighted in dashed red lines are the sample parcels used in this analysis. The structure on the 9,284 square foot lot facing NE 189<sup>th</sup> Place takes up approximately 33% of the land area, while the structure on the 10,245 square foot lot facing NE 188<sup>th</sup> Street takes up 25% of the land area.

Figure 51. RS 10 Grid North Site

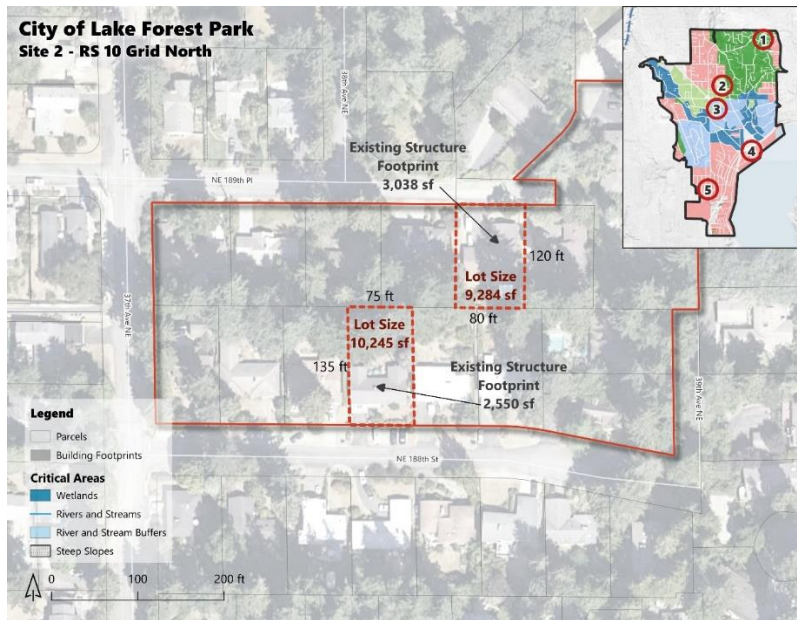


Figure 52. Houses on NE 189<sup>th</sup> Place



Figure 53. Houses on NE 188<sup>th</sup> Street



Figure 54. 3D Aerial View of the RS 10 Grid North Site



Source: Google Maps.

While both lots are large enough to include a backyard ADU on site, the existing tree coverage would make that challenging. It is likely, therefore, that the conversion of existing structures or redevelopment would be required on these lots to accommodate middle housing.

	<b>9,284 Square Foot Lot</b>	<b>10,245 Square Foot Lot</b>
<b>Infill Opportunities</b>	Internal Conversion	Internal Conversion
<b>Redevelopment Opportunities</b>	Duplex (stacked or side-by-side) Tri-plex Fourplex Sixplex	Duplex (stacked or side-by-side) Tri-plex Fourplex Sixplex Townhouse (up to 3 units) Courtyard Building

### Site 3: RS 20 Deep Creek

Site 3: RS 20 Deep Creek, shown in Figure 55 below, is bound by 35<sup>th</sup> Avenue NE, Ballinger Way NE, 40<sup>th</sup> Avenue NE, and NE 182<sup>nd</sup> Street. It includes long lots that are constrained by Lyon Creek and the associated buffered wetland area. Like Site 2, Site 3 has a significant number of large trees that could potentially constrain building. Ballinger Way NE is served by bus route 331, which reaches from Kenmore to Shoreline. The lots are approximately 100 feet wide and most currently include single family homes. The two lots highlighted in dashed red lines are the sample parcels used in this analysis. The structure on the 40,950 square foot lot facing Ballinger Way NE takes up approximately 6.7% of the unconstrained land area, while the two structures on the 59,677 square foot lot facing NE 182<sup>nd</sup> Street take up 8.8% of the unconstrained land area.

Figure 55. RS 20 Deep Creek

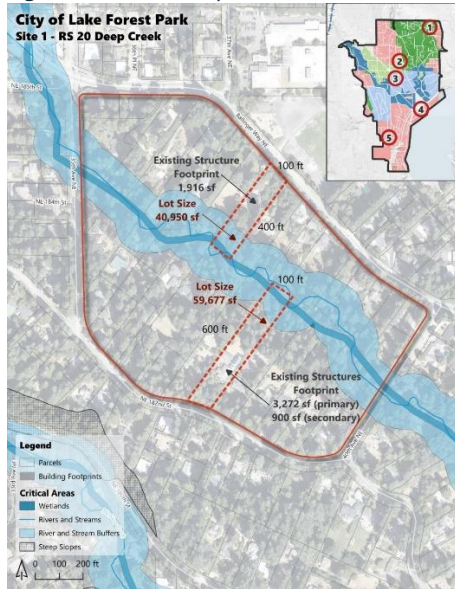


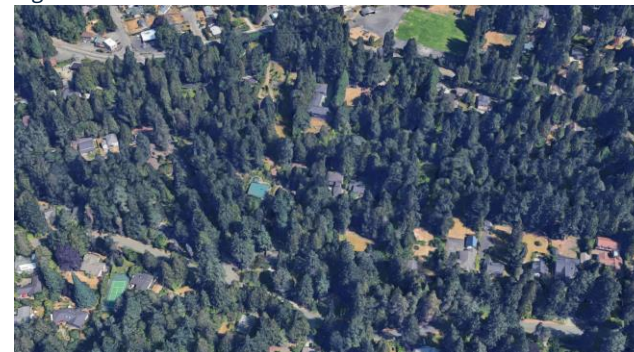
Figure 56. View of Site 3 from Ballinger Way NE



Figure 57. View of Site 3 from NE 182<sup>nd</sup> Street



Figure 58. 3D Aerial View of Site 3



Source: Google Maps.

Even accounting for the area constrained by Lyon Creek and its buffer, the lots in Site 3 are large. While the significant tree coverage could be a major constraint, the site's adjacency to Ballinger Way NE and bus route 331 along with the large lot sizes could potentially make it an ideal location for middle housing. Redevelopment opportunities would allow for middle housing, especially non-uniform cottage clusters, without impacts to tree coverage.

	<b>40,950 Square Foot Lot (28,691 SF unconstrained)</b>	<b>59,677 Square Foot Lot (47,651 SF unconstrained)</b>
<b>Infill Opportunities</b>	ADU Duplex ADU	ADU Duplex ADU
<b>Redevelopment Opportunities</b>	Duplex (stacked or side-by-side) Tri-plex Fourplex Fiveplex Sixplex Townhouse (up to 3 units) Courtyard Building	Duplex (stacked or side-by-side) Tri-plex Fourplex Fiveplex Sixplex Townhouse (up to 3 units) Courtyard Building

### Site 4: RS 7.2 Lake Adjacent

The RS 7.2 zoned site in Figure 59 below is a lakeside block bound by NE 171<sup>st</sup> Street, Shore Drive NE, NE 170<sup>th</sup> Street, and Beach Drive NE. The lots at this site not constrained by major environmental factors, and the tree coverage is not as significant as Sites 2 and 3. The lots are relatively small and vary in size, with the western lots smaller than the eastern ones. This block is also proximate to Bothell Way NE, which is served by bus routes 322 (Kenmore to Seattle), 372 (Bothell to Seattle), 522 (Woodinville to Seattle), and 981 (Lakeside School to Mercer Island). The two lots highlighted in dashed red lines are the sample parcels used in this analysis. The structure on the 5,000 square foot lot takes up approximately 37% of the land area, while the structure on the 7,500 square foot lot takes up 32% of the land area.

Figure 59. Site 4: RS 7.2 Lake Adjacent

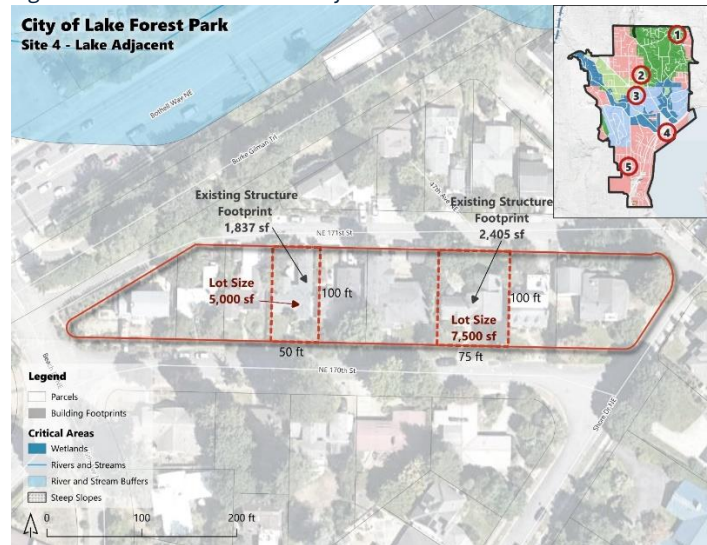


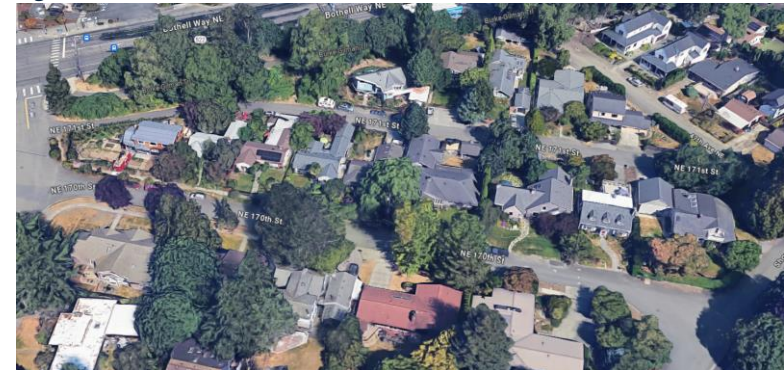
Figure 60. View of Site 4 from NE 170<sup>th</sup> Street



Figure 61. View of Site 4 from NE 171<sup>st</sup> Street



Figure 62. 3D Aerial View of Site 4



Source: Google Maps.

Because these lots are smaller than those at other sites, there is likely less of an opportunity for detached ADUs, though it may be possible to subdivide the existing structures or potentially build an attached ADU on the 7,500 square foot site. While a two- to four-unit structure could potentially be built on these sites through redevelopment, there are fewer options for middle housing construction here than at the other sites evaluated in this report.

	<b>5,000 Square Foot Lot</b>	<b>7,500 Square Foot Lot</b>
<b>Infill Opportunities</b>	Internal Conversion	Attached ADU Internal Conversion
<b>Redevelopment Opportunities</b>	Duplex (stacked or side-by-side) Tri-plex Fourplex	Duplex (stacked or side-by-side) Tri-plex Fourplex

### Site 5: RS 7.2 Grid South

The RS 7.2 zoned site in Figure 63 below is bound by NE 160<sup>th</sup> Street, 35<sup>th</sup> Avenue NE, NE 158<sup>th</sup> Street, and 34<sup>th</sup> Avenue NE. The lots at this site not constrained by major environmental factors, and while there is some tree coverage it is not as densely wooded as other sites evaluated in this report. The lots are regularly sized and within a neighborhood with a regular street grid. The two lots highlighted in dashed red lines are the sample parcels used in this analysis. Both lots are 13,054 square feet. The structure on the northeast lot takes up 12% of the land area while the structure on the southeast lot takes up 19% of the land area.

Figure 63. Site 5: RS 7.2 Grid South

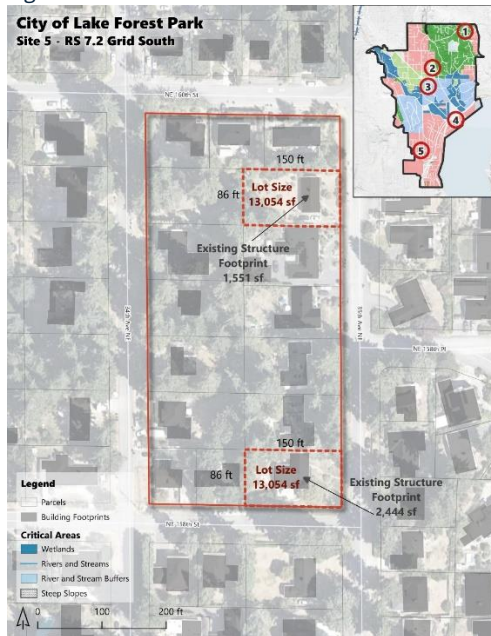


Figure 64. View of Site 5 from 34<sup>th</sup> Avenue NE



Figure 65. View of Site 5 from 35<sup>th</sup> Avenue NE



Figure 66. 3D Aerial Image (facing west) of Site 5



Source: Google Maps.

The southeast lot is not constrained by significant tree coverage, and the current structure on site takes up less than a fifth of lot area. However, the structure is situated in the middle of the lot, which may impact the ability to build a detached duplex on site. The northeast lot does not have significant tree coverage and has ample room on the rear portion of the site for a detached or attached ADU.

	<b>Northwest Lot</b>	<b>Southeast Lot</b>
<b>Infill Opportunities</b>	Attached ADU Detached ADU	Attached ADU

<b>Redevelopment Opportunities</b>		
	Duplex (stacked or side-by-side)	Duplex (stacked or side-by-side)
	Tri-plex	Tri-plex
	Fourplex	Fourplex
	Sixplex	Sixplex
	Townhouse (up to 3 units)	Townhouse (up to 3 units)
	Courtyard Building	Courtyard Building



# IMPLEMENTATION CONSIDERATIONS

## Purpose

The purpose of this section is to analyze the specific context of Lake Forest Park's zones and neighborhoods to inform specific regulatory strategies aimed at meeting the City's goals while complying with new state middle housing requirements. LCG analyzed dimensional feasibility of different middle housing types across the City's zones to identify the areas where more dense middle housing could fit, highlighted regulatory considerations that will inform the code writing process, and suggested strategies to promote affordable homeownership.

## Key Takeaways

- The prevalence of large lots in Lake Forest Park increases the feasibility of a wide variety of middle housing types. However, current lot coverage standards are a major limiting factor. Raising the allowed lot coverage to 50 percent would significantly increase the feasibility of middle housing up to six units, especially on lots that are partially constrained by environmental factors.
- Increasing flexibility in zoning regulations and allowing a wider variety of housing types than is required under HB 1110 would help Lake Forest Park meet its housing goals while reducing the need for tree removal or development in environmentally sensitive areas.
- Lake Forest Park should consider allowing more than two units per lot in targeted areas, such as within a half mile of transit.
- Building increased flexibility into the City's zoning code will require decisions regarding density, height, lot coverage, parking, lot size, and floor area ratio regulations. This decision-making process should weigh City goals and priorities with established best practices and state requirements.
- To promote opportunities for affordable homeownership, the City should partner with affordable homebuilders to understand community needs, establish incentives including density bonuses and/or fee waivers, loosen regulations on fee-simple lot splitting, and establish a funding source for affordable housing development.

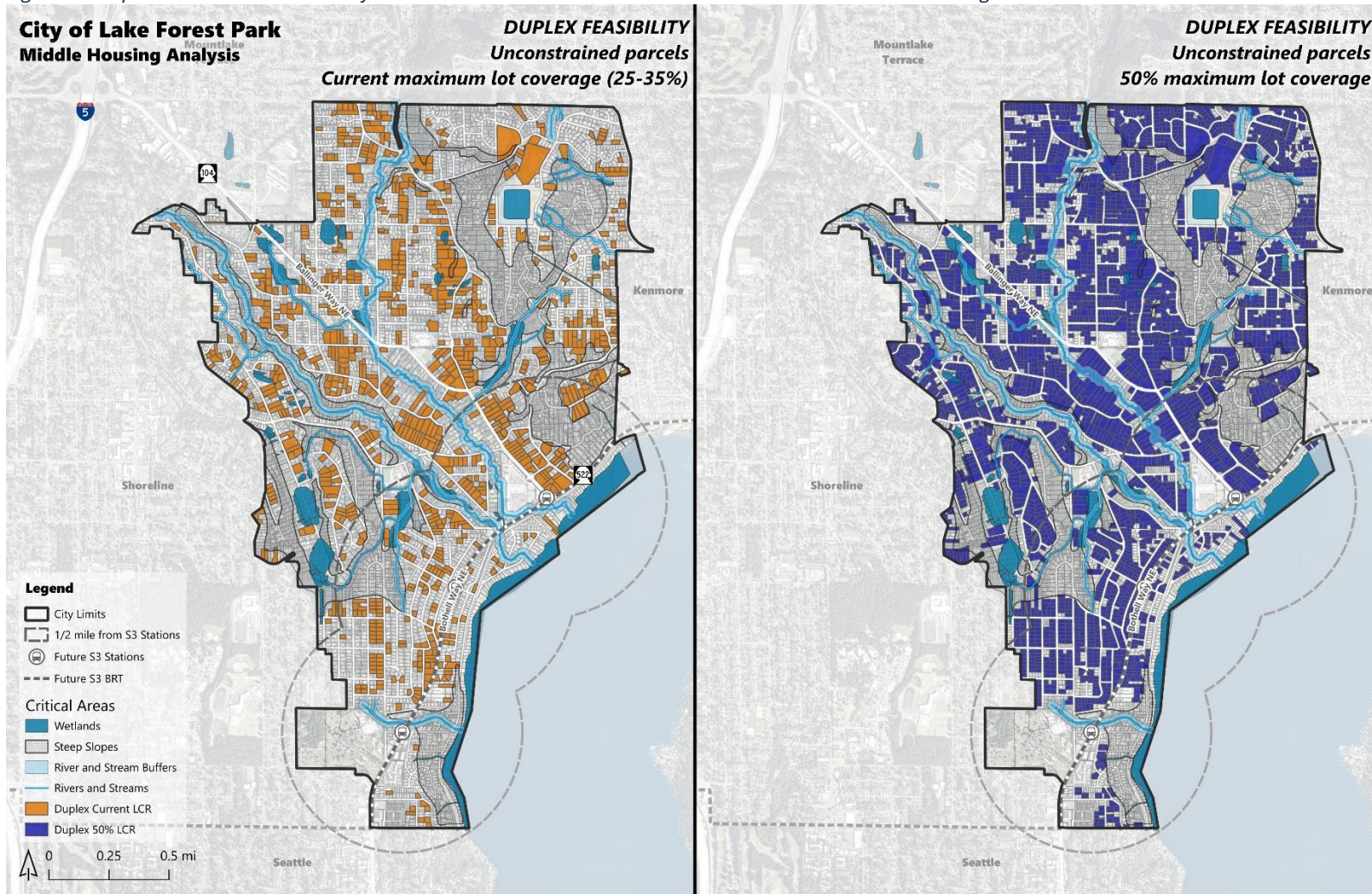
## Feasibility by Lot Size

Based on the dimensional requirements for various middle housing types discussed above, LCG analyzed Lake Forest Park's residential lots to obtain a high-level overview of where various middle housing types could be developed in the city. These estimates were based on Opticos and Commerce's estimates of 4,000 square feet of land needed for a duplex, 4,500 square feet for a triplex or fourplex, 5,800 square feet for a sixplex, and 12,000 square feet for a cottage cluster. These estimates only take into account total lot size rather than a detailed dimensional analysis of parcel characteristics, but give a general overview of the city's capacity for middle housing.

For each housing type, maps are shown where the development would be dimensionally feasible under the current maximum lot coverage in each zone, as well as a scenario where the maximum lot coverage is increased to 50 percent citywide.

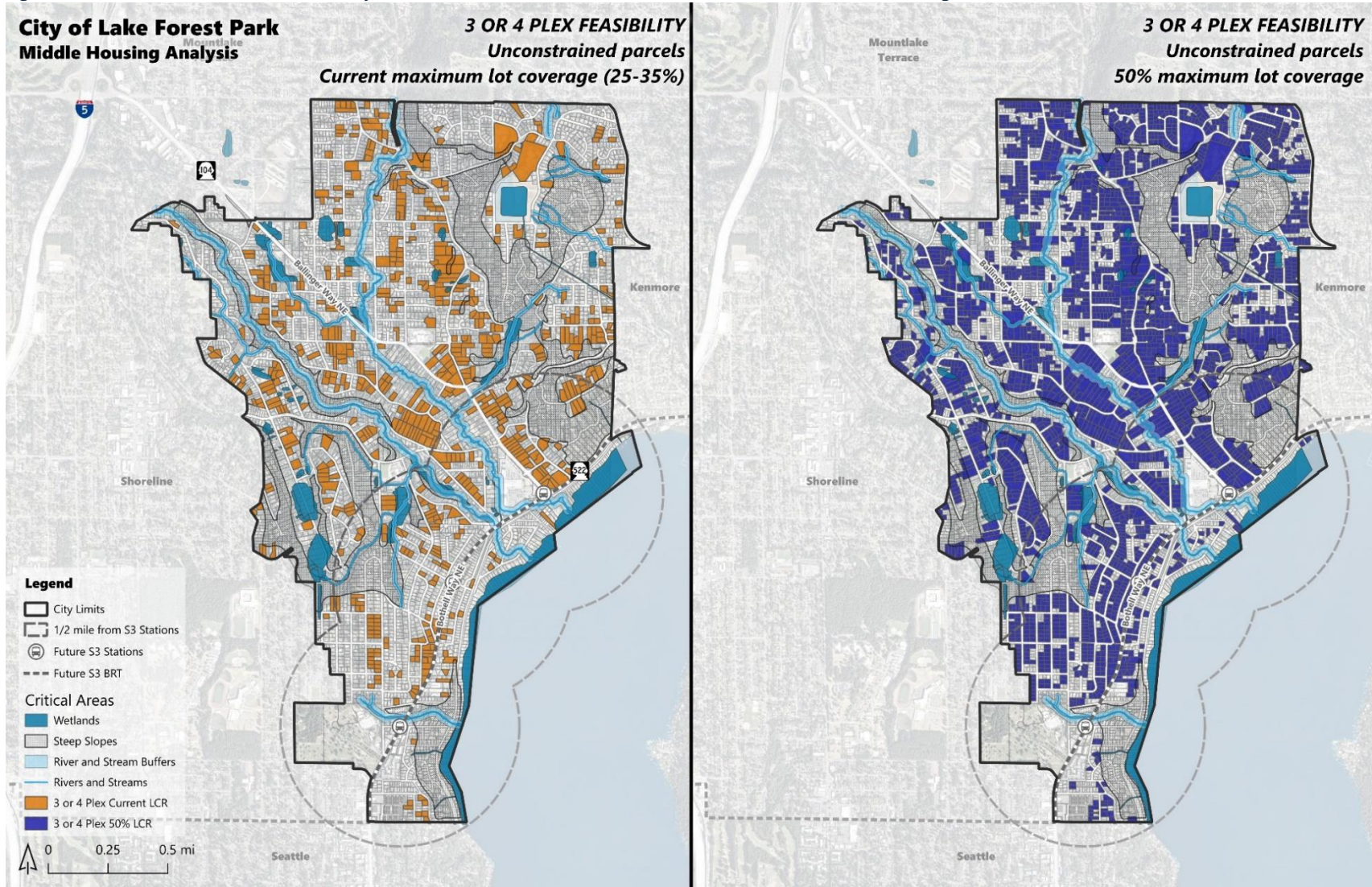
Notably, the capacity for middle housing in high-potential areas such as within ½ mile of future BRT service, in the RS-7.2 (South) area with less existing tree coverage and better walkability to retail amenities, and in the RS-10 area along Ballinger way are significantly increased with the increased maximum lot coverage allowances. Although the city may not wish to increase maximum lot coverage to 50 percent in all zones, this analysis suggests that an increased maximum lot coverage in the smaller-lot zones (RS-10, RS-9.6 and particularly RS-7.2) would notably increase the capacity for duplexes, triplexes, and fourplexes in desirable areas for middle housing. As noted previously in this report, the largest numbers of nonconforming lots already exceeding the maximum lot coverage are found in the RS-7.2 South and Lake areas, where an increase in lot coverage would be most impactful.

Figure 67. Duplex Dimensional Feasibility in Lake Forest Park with Current and Increased Maximum Lot Coverage



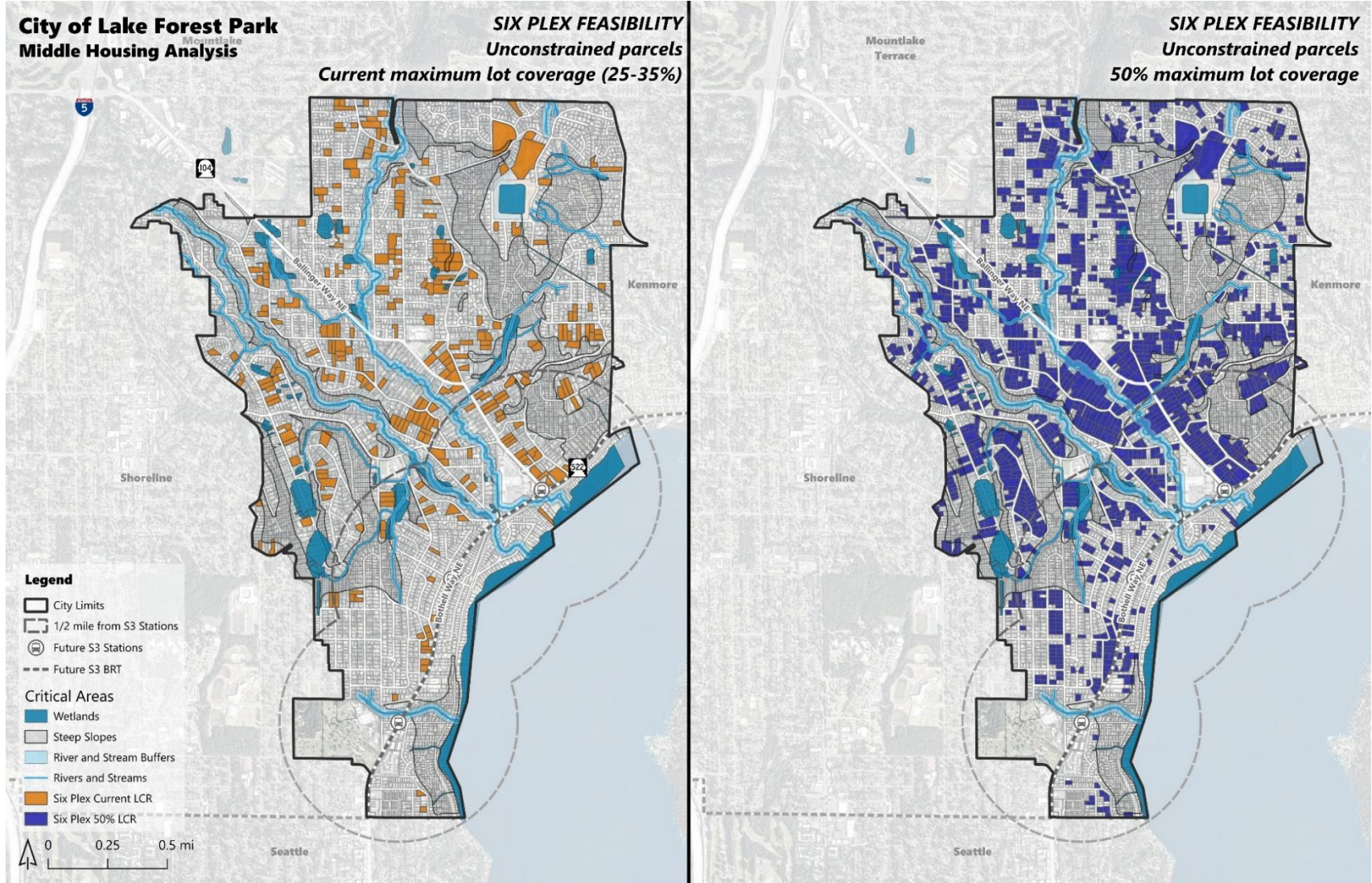
Source: City of Lake Forest Park, King County, Leland Consulting Group

Figure 68. 3 or 4-Plex Dimensional Feasibility in Lake Forest Park with Current and Increased Maximum Lot Coverage



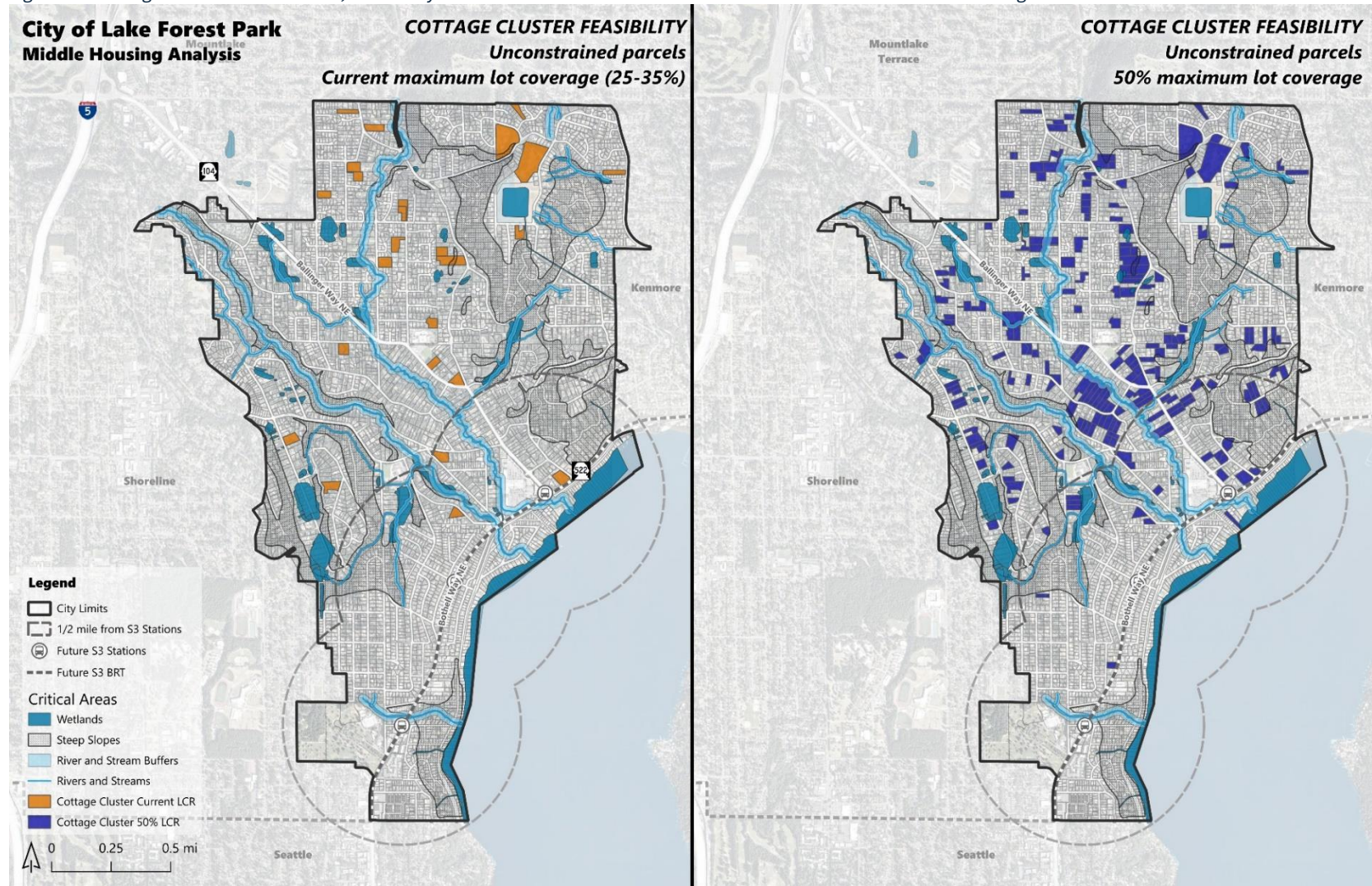
Source: City of Lake Forest Park, King County, Leland Consulting Group

Figure 69. Six-Plex Dimensional Feasibility in Lake Forest Park with Current and Increased Maximum Lot Coverage



Source: City of Lake Forest Park, King County, Leland Consulting Group

Figure 70. Cottage Cluster Dimensional; Feasibility in Lake Forest Park with Current and Increased Maximum Lot Coverage



Source: City of Lake Forest Park, King County, Leland Consulting Group

## Regulatory Considerations

### Prioritized Locations for Middle Housing

Lake Forest Park is required to allow up to two units on all residential zones. However, there may be some zones or locations within the city where denser middle housing types should be allowed. These include areas that are walkable to transit and retail, as shown in the “Walkability” section of this document. The most walkable areas of the city generally coincide with the RS 10 and RS 7.2 zones. If the City chooses to target denser middle housing types by zone, these should be the prime targets for increased density.

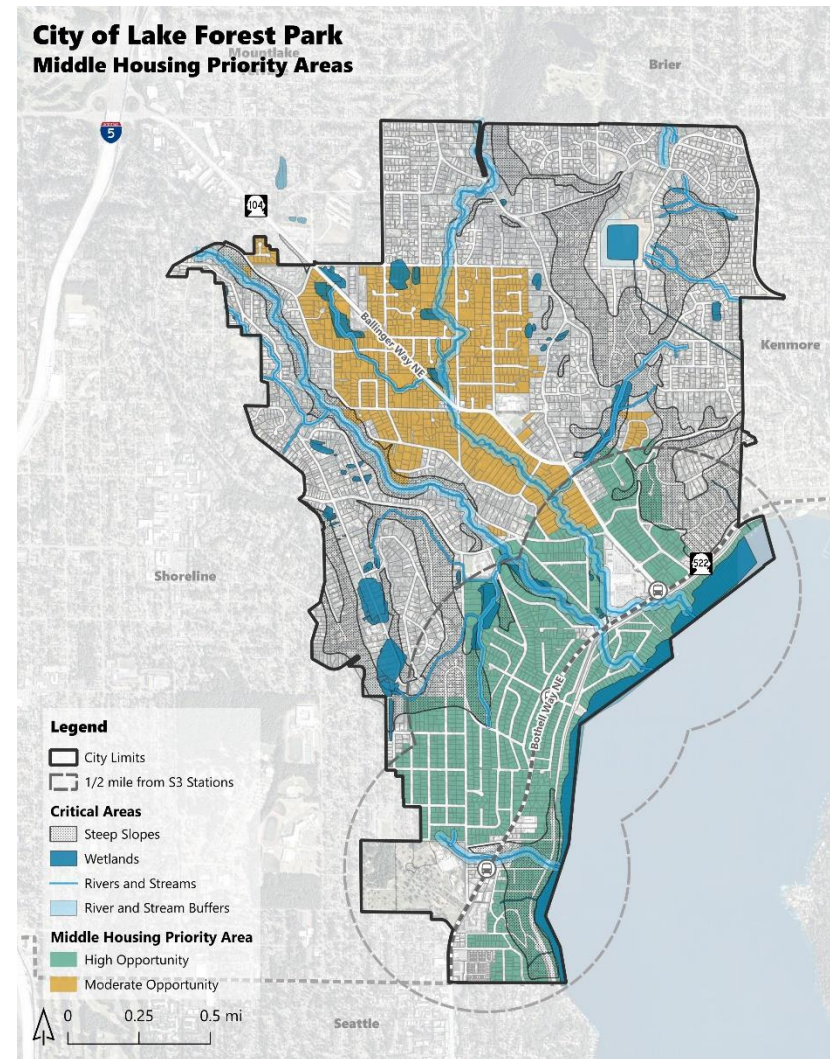
Alternatively, the City could choose to allow denser middle housing types in all areas within a half mile of high-frequency transit. This would include portions of the RS 7.2, RS 15, and RS 20 zones. The areas near transit also typically have less dense tree canopy – increasing the density allowed on these lots would help reduce the impact of construction on the existing tree canopy and promote climate resilience.



The map in Figure 71 shows LCG’s assessment of key areas in which the city could choose to allow additional middle housing types. The green “High Opportunity” areas comprise the RS-7.2 and RS-15 zoned areas within ½ mile of future BRT stops. These areas have the highest potential walkability to both amenities and transit, have less existing tree canopy and fewer critical areas than other parts of the city, and have more regular gridded lots, making placement and access for additional middle housing types easier. Additionally, with an increase in allowed lot coverage from the current 35 up to 45 or 50 percent, many middle housing types up to a sixplex could be built in these areas, as shown above in Figure 67 through Figure 69.

The yellow parcels represent “Moderate Opportunity” areas for increased middle housing density if the city wishes to further expand housing choice and opportunity. This area comprises the existing RS-10 zone, a portion of the northern part of the RS-7.2 zone, and two blocks of deep RS-20 parcels. Although somewhat farther from the future BRT stations, these areas are still within walking distance of existing transit and more accessible to existing retail and amenities than many other residential areas of the city. Additionally, many of the parcels in these areas are already of a size that can accommodate several middle housing types, even within current lot coverage maximums.

Figure 71. Prioritized Locations for Middle Housing in Lake Forest Park



Source: City of Lake Forest Park, Leland Consulting Group

## Types of Middle Housing

Because Lake Forest Park is a Tier 3 city, it is only required to allow two dwelling units per lot on all lots zoned predominantly residential. However, the City could choose to allow a wider variety of housing types on residential lots to increase housing opportunity on the city's non-uniform lots while reducing impacts on environmentally constrained areas (including steep slopes, wetlands, streams, buffers, and large-tree coverage). Fourplexes, for instance, require a minimum lot size of 50 feet by 90 feet. This could be ideal for lots with significant tree coverage or wetland buffers.

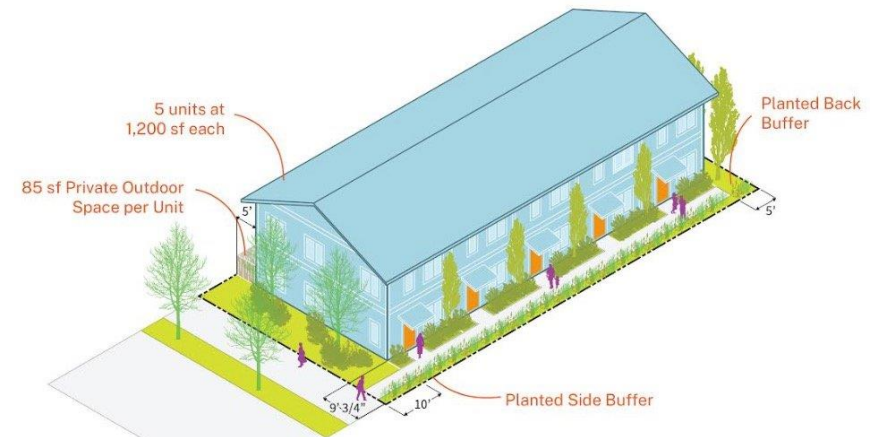
Allowing more units on each lot (or on lots in some zones) could potentially reduce the number of lots that need to be redeveloped to meet new housing demand. Increasing flexibility in the typologies allowed, by permitting cottage clusters, detached ADUs, or courtyard buildings, could also allow developers to build housing without needing to remove existing large trees.

Because of the environmental constraints and access challenges in some Lake Forest Park zones, the City could also choose to allow different middle housing densities in different zones or areas. For instance, allowing up to six units in areas within a half mile of transit while allowing up to four units in other areas. As discussed below, the City could also consider implementing density bonuses for affordable housing.

Housing should also respond to community needs. In 2016 Portland State University surveyed communities of color for its proposed [Pathway 1000 Community Housing Plan](#), finding that these communities preferred housing with front doors and porches rather than stacked flats. This led to the inclusion of

novel housing types in the Residential Infill Project, like side-by-side sixplexes which are essentially townhouses oriented sideways to fit on more narrow lots. Community needs and preferences can vary, so Lake Forest Park should ensure it is working with vulnerable communities and nonprofit development organizations to understand and plan for community needs.

Figure 72. Five Townhouses in a “Side-by-Side” Configuration, with Doors Facing the Side of the Lot



Source: Portland: Neighbors Welcome ([Link](#)).

## Considerations for Middle Housing Development Standards

As Lake Forest Park embarks on implementing its middle housing code, it should consider the following:

Potential Policy / Goal	Considerations
Allow more units per lot than the minimum required by HB 1110 to increase development feasibility	<ul style="list-style-type: none"> <li>Allowing four to six units per lot would increase the feasibility of middle housing being developed, and increase the affordability of units that are built.</li> <li>The City could choose to allow more than two units on every residential lot or in targeted zones or geographical areas (such as within a half mile of transit).</li> </ul>
Redefine Density	<ul style="list-style-type: none"> <li>Density must be defined by units per lot rather than units per acre or other measures of density.</li> </ul>
Reduce Off-Street Parking Requirements	<ul style="list-style-type: none"> <li>The City currently requires 1.5 parking spaces per unit for multifamily dwellings. This is likely to negatively impact the feasibility of middle housing development, especially on lots constrained by environmental issues and/or tree coverage.</li> <li>Parking requirements could be reduced across all zones or specifically in the areas targeted for more dense middle housing types, such as neighborhoods near transit, and areas with the potential for on-street parking.</li> <li>The number of spaces could also be tied to the number of bedrooms, with lower parking requirements for smaller studio and one-bedroom units.</li> <li>Per HB 1337, the City cannot require parking for ADUs within a half mile of transit.</li> </ul>
Increase Height Limits	<ul style="list-style-type: none"> <li>Lake Forest Park's residential zones allow construction up to 30 feet. While this is adequate for most middle housing types, given the environmental constrictions (including tree canopy), the City should consider increasing height limits to allow for taller buildings with smaller footprints.</li> <li>Height limits can vary by zone – if the City chooses to allow more than two units per lot in some zones, it should ensure that the height limit is not lower than 35 feet in those zones.</li> <li>Three-story buildings are typically compatible with low-density residential development.</li> </ul>
Increase Maximum Lot Coverage	<ul style="list-style-type: none"> <li>The current maximum lot coverage in Lake Forest Park's residential zones ranges from 25% to 35%. This is inadequate to accommodate multiple buildings or buildings with more than one unit on site. The <a href="#">Washington model code</a> states that a lot coverage limit for middle housing of less than 40% is invalid.</li> <li>Increasing the maximum lot coverage will allow developers greater flexibility to build a wider variety of homes, particularly on smaller lots that have fewer environmental constraints.</li> <li>Changing these regulations may require adjustments to setbacks as well.</li> </ul>

<p>Create FAR Bonuses for Middle Housing</p>	<ul style="list-style-type: none"> <li>• To incentivize a wider variety of middle housing types, it is a best practice to create FAR bonuses for each additional unit included. This can vary by zone or target area.</li> <li>• The <a href="#">Washington model code</a> for middle housing in Tier 1 and 2 cities recommends a minimum FAR of 0.6 for a single-family home increasing by 0.2 for each additional unit up to six units. In Portland, FAR starts at a base of 0.4 for single family homes and increases by 0.1 for each additional unit up to four units.</li> </ul>
<p>Preserve the Tree Canopy</p>	<ul style="list-style-type: none"> <li>• Preservation of the tree canopy is a priority of Lake Forest Park residents.</li> <li>• To reduce the need for tree removal, the City should consider more flexible development regulations that allow for a wider variety of housing types, which can be built around existing trees.</li> </ul>
<p>Allow Novel Housing Typologies</p>	<ul style="list-style-type: none"> <li>• Environmental constraints and non-standard lot shapes and sizes will impact middle housing development in Lake Forest Park.</li> <li>• The City should consider allowing a wider variety of housing types than is currently included in the <a href="#">Opticos typology report</a> commissioned by the Department of Commerce. While this report is a useful guide in understanding the typical layouts and dimensions of common middle housing types, it is not an exhaustive list of all possibilities. Allowing flexibility for cottage clusters or other detached unit arrangements could allow for these types of developments on lots that don't meet the dimensional standards in the report.</li> <li>• Writing flexibility into the code, especially regarding the orientation and location of buildings and building entrances, will be a key component of enabling the construction of new housing types.</li> </ul>
<p>Loosen ADU Regulations</p>	<ul style="list-style-type: none"> <li>• Currently, Lake Forest Park's Municipal Code requires that ADUs cover no more than 10% of land area up to a maximum of 1,000 SF. They are only permitted in a rear yard, ten feet or more from main buildings. The ADU-specific lot coverage limit will need to be removed due to the regulations in HB 1337, which prohibit lot coverage limits and setbacks more restrictive than those applicable to the principal structure.</li> <li>• Because many of the residential lots in Lake Forest Park are wooded and include long driveways that conceal houses from the street, the City should allow ADUs to be built in front and/or side yards as well as rear yards. This would reduce impacts to the tree canopy and enable the construction of new housing on more lots.</li> <li>• Under HB 1337, the City is required to allow at least two ADUs per lot. There are a large number of lots in Lake Forest Park (for instance the "Deep Creek" lots mentioned above) that could accommodate multiple detached structures. This could help preserve tree canopy by allowing for multiple small structures placed around a site rather than a single multi-unit structure.</li> </ul>

<p>Change Lot Division Standards / Reduce Minimum Lot Sizes</p>	<ul style="list-style-type: none"> <li>• Current City regulations require 75 feet of street frontage for newly created lots and do not allow minimum lot sizes smaller than those defined by the existing zones.</li> <li>• Increasing opportunities for lot division can help promote more affordable homeownership options.</li> <li>• While HB 1245 did not pass the State Senate, it could be a guide for allowing middle housing lot division. This law would have allowed lots created through division to be as small as 2,000 square feet.</li> </ul>
<p>Require Accessible or Visitable Units</p>	<ul style="list-style-type: none"> <li>• The City could choose to require some number or percentage of units within middle housing development to be accessible or visitable.</li> <li>• Accessible units meet the ADA requirements for housing, while visitable units have a limited number of accessibility features on the ground floor.</li> <li>• The City should consider targeting accessibility and/or visitability regulations to larger housing types such as fourplexes, sixplexes, and courtyard apartments.</li> <li>• The inclusion of these features would help improve housing access for elderly and disabled residents and their families.</li> </ul>
<p>Establish Incentives for Affordable Housing</p>	<ul style="list-style-type: none"> <li>• To achieve its goal of increasing affordable homeownership opportunities, the City should include bonuses for the inclusion of affordable units in middle housing developments.</li> <li>• These can include density or height bonuses or a reduction in parking requirements if some percentage of units is affordable. In Portland, six units are allowed if half are affordable – the City should work with nonprofit housing developers to determine the appropriate calibration of incentives given local market conditions.</li> <li>• Alternatively, the City could consider waiving some or all fees for middle housing developments that include affordable units.</li> <li>• Similar incentives could also be targeted to accessible housing.</li> </ul>

## ALTERNATIVE COMPLIANCE PATH & CRITICAL AREA EXEMPTIONS

## Purpose

This section discusses Lake Forest Park’s potential options for addressing critical areas in the context of HB 1110 implementation. As outlined in the introductory section of this report, HB 1110 contains a provision for cities to exempt up to 25 percent of parcels from increased density requirements under an “Alternative Compliance Path.” In addition, HB 1110 contains other provisions and options for cities relating to the exemption of parcels in critical areas from increased density requirements.

## Key Takeaways

- While HB 1110 does allow cities to exclude any lots that contain critical areas (as defined in the GMA), this broad exemption would have an outsized impact on Lake Forest Park due to the large number of constrained or partially constrained lots.
- Many of the partially constrained lots in Lake Forest Park are large enough that middle housing could be built easily on non-constrained portions. Commerce recommends that middle housing be subject to the same critical areas regulations as detached single-family housing, in order to “better implement the Housing Element requirements to make adequate provisions for existing and projected needs of all economic segments of the community.”
- The Alternative Compliance Path would allow Lake Forest Park to exempt up to 25 percent of its lots from increased density requirements. However, this must be weighed against the Racially Disparate Impacts of excluding middle housing in these areas. Because so much of Lake Forest Park had racially restrictive covenants, LCG does not recommend that Lake Forest Park pursue the Alternative Compliance Path.

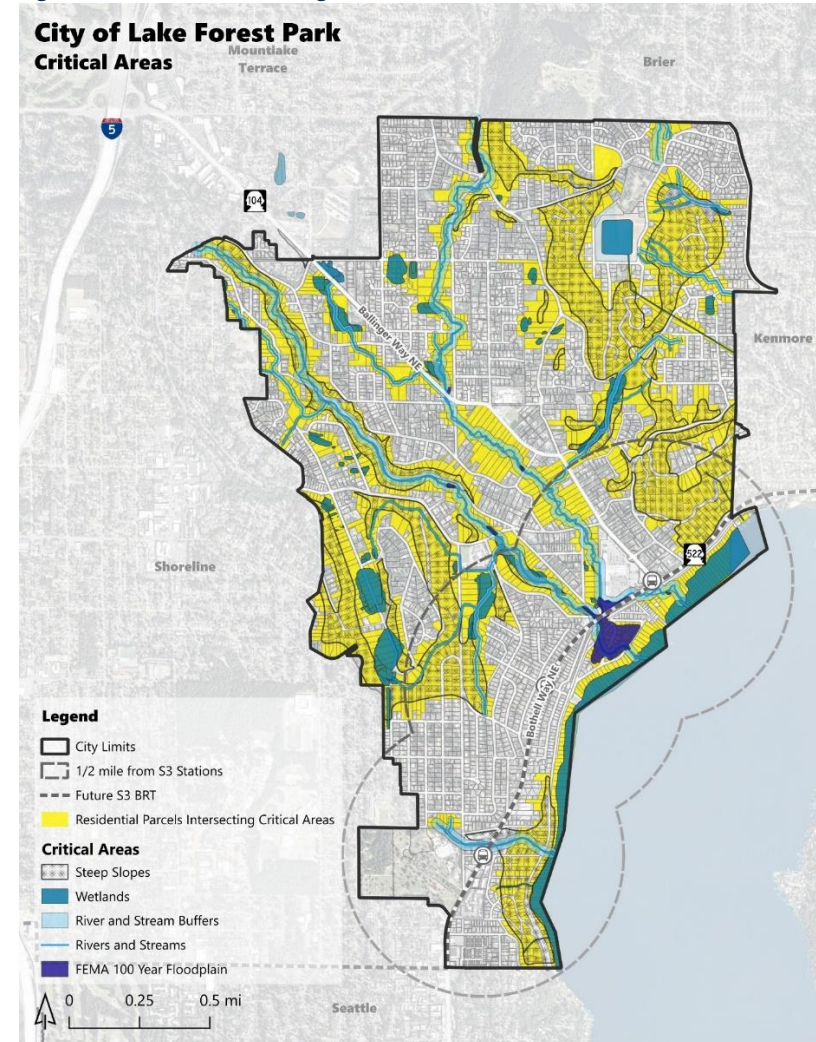
## Critical Areas Exemption

RCW 36.70A.635(8)(a) states that the increased density requirements of HB 1110 do not apply to lots where any portion of the lot has a designated critical area or its buffer. This provision is separate from the option for cities to exempt parcels with critical areas through the “Alternative Compliance Path,” which is discussed further below. Under this exemption, the following critical areas and their buffers apply, as defined in the GMA (RCW 36.70A.030(6)):

- Wetlands
- Areas with a critical recharging effect on aquifers used for potable water
- Fish and wildlife habitat conservation areas (this does not include such artificial features as irrigation delivery systems, irrigation infrastructure, irrigation canals, or drainage ditches)
- Frequently flooded areas<sup>2</sup>
- Geologically hazardous areas

Due to Lake Forest Park’s large amount of critical areas, this exemption would result in a very large amount of parcels being exempted from the requirements of HB 1110. A total of 1,885 parcels intersect one of Lake Forest Park’s critical areas or buffers, representing 40 percent of the total single-family parcels in the city. The map below in Figure 73 shows the locations of these parcels.

Figure 73. Parcels Intersecting All Critical Areas in Lake Forest Park



Source: King County, City of Lake Forest Park, Leland Consulting Group

<sup>2</sup> These are defined using FEMA floodplain maps



In the [User Guide for the Middle Housing Model Ordinance](#), the Department of Commerce suggests that this method of exempting critical areas, though allowed, is not recommended and “could substantially reduce housing capacity by restricting development on lots where a middle housing development could otherwise meet critical area code requirements.” Instead, Commerce recommends that middle housing be subject to the same critical areas regulations as detached single-family housing, in order to “better implement the Housing Element requirements to make adequate provisions for existing and projected needs of all economic segments of the community.”

Given the large amount of critical areas in Lake Forest Park, and the many parcels shown in Figure 73 which are only partially or slightly constrained, adopting this exemption would significantly reduce capacity for middle housing in the city, and would significantly impact Lake Forest Park’s ability to encourage increased housing affordability throughout its neighborhoods and to serve a wide variety of residents’ needs. The city’s existing critical areas ordinance for single-family development contains sufficient provisions to ensure protection of these areas if applied to middle housing types. Under [16.16.020](#), “any alteration of or work in or development of critical areas and their buffers is prohibited.” Furthermore, the “Alternative Compliance Path” does provide a more nuanced option if the city wishes to carve out certain critical areas from increased middle housing density.

However, in their guidance for implementing the Model Ordinance, Commerce notes that this exemption “could

substantially reduce housing capacity by restricting development on lots where a middle housing development could otherwise meet critical area code requirements,”<sup>3</sup> and recommends that cities do not adopt this exemption into their code and instead apply existing critical areas ordinances to middle housing types in the same way they are currently applied to single-family housing, or use the more nuanced “Alternative Compliance Path,” discussed below.

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<sup>3</sup> Washington Department of Commerce “[Middle Housing Model Ordinances User Guide](#),” January 26, 2024

## Alternative Compliance Path

As discussed in the introductory section of this report, cities may pursue an “Alternative to Density Requirements” Compliance Path for HB 1110, as outlined in RCW 36.70A.635(4). This alternative permits a city to exempt up to 25 percent of single-family lots from increased density requirements. These 25 percent (or less) of parcels must include but are not limited to:

- Lots designated with critical areas or their buffers
- Any portion of a city within a one-mile radius of a commercial airport with at least 9,000,000 annual enplanements (only applies to the City of SeaTac)
- Areas subject to sea level rise, increased flooding, susceptible to wildfires, or geological hazards over the next 100 years

In addition, this option has requirements for parcels which cannot be exempted from additional density requirements, as follows:

- Any areas for which the exclusion would further racially disparate impacts or result in zoning with a discriminatory effect;
- Any areas within one-half mile walking distance of a major transit stop;
- Any areas historically covered by a covenant or deed restriction excluding racial minorities from owning property or living in the area, as known to the city at the time of each comprehensive plan update.

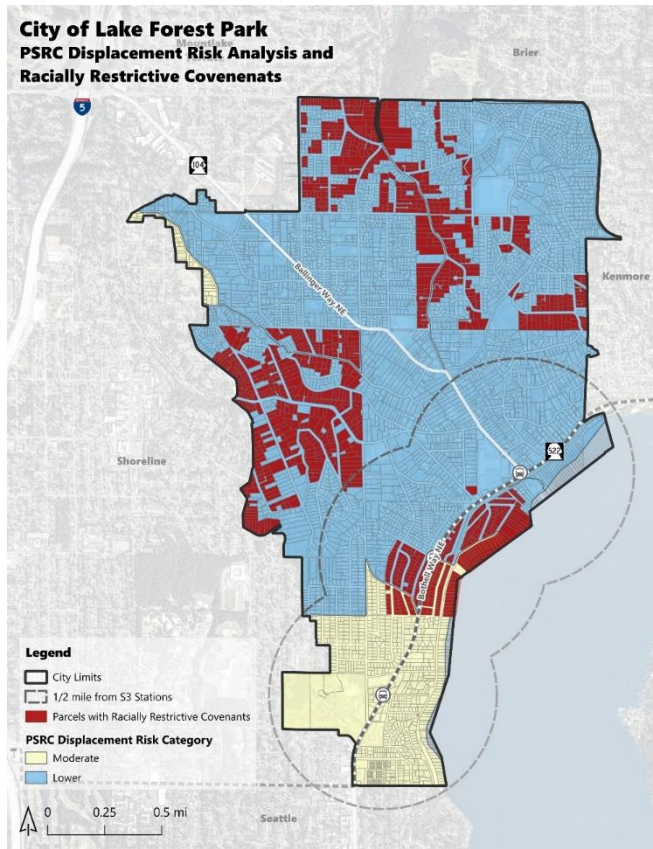
The total universe of parcels which could be exempted due to containing critical areas or their buffers is shown above in Figure 73. As discussed previously, this constitutes 40 percent of

parcels in the city, well above the maximum of 25 percent which could be exempted under this provision.

The restrictions on which parcels can be exempted also apply in various areas of Lake Forest Park. The planned S3 Bus Rapid Transit line along Bothell Way NE is expected to begin operation within the planning horizon of this Comprehensive Plan update. There are 1,754 single-family parcels within ½ mile of the S3 stops, which is shown with a dashed circle below in Figure 74. These parcels would be ineligible for exclusion from additional density requirements under the Alternative Compliance Path.

Additionally, PSRC’s displacement risk index shows that the southern part of the city (shown in yellow in the map below) has a moderate risk of displacement, though nowhere in the city qualifies as a high-risk area. This may indicate the potential for further racially disparate impacts in that area. Finally, there are at least 1,194 known parcels in Lake Forest Park with existing racially restrictive covenants prohibiting them from being occupied by non-White residents, according to research from the [Racial Restrictive Covenants Project](#) at the University of Washington and Eastern Washington University. These parcels are shown in red in the map below. Although these covenants are no longer enforced, they are not eligible for exclusion from the requirements of HB 1110 under the Alternative Compliance Path.

Figure 74. PSRC Displacement Risk and Racially Restrictive Covenants in Lake Forest Park

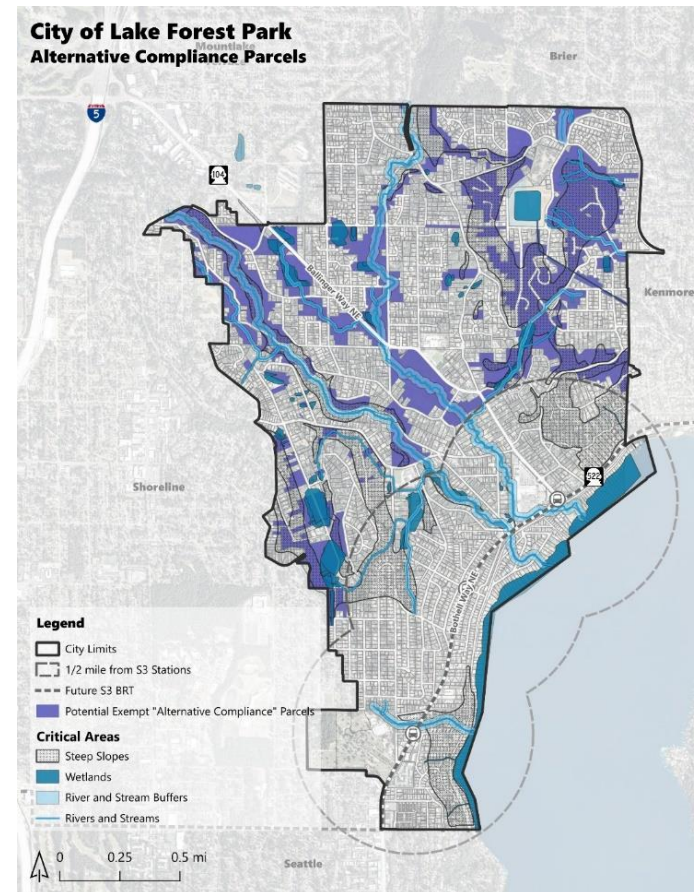


Source: Puget Sound Regional Council, University of Washington Civil Rights and Labor History Consortium, King County, Leland Consulting Group

Taking all these considerations into account, there are a total of 885 parcels, or 19 percent of the total single-family parcels in Lake Forest Park, that could be exempted from HB 1110 additional density under the “Alternative Compliance Path.” These parcels are shown below in Figure 75. Since this set of

parcels represents less than 25 percent of parcels in Lake Forest Park, the city could potentially exempt all of these parcels under the “Alternative Compliance Path,” or it could choose a subset of these parcels where increased density may have particularly adverse environmental effects.

Figure 75. Potential Parcels Exempt Under “Alternative Compliance” Path



Source: Puget Sound Regional Council, University of Washington Civil Rights and Labor History Consortium, King County, Leland Consulting Group