

Land Capacity Analysis

As part of Shoreline's 2044 Comprehensive Plan update, Leland Consulting Group (LCG) was retained as part of a consultant team led by Otak to complete an analysis of land capacity for housing and jobs, including considerations of housing by income band as required by RCW 36.70A.070(2)(c) and adequate provisions for meeting all housing needs as required by RCW 36.70A.070(2)(d). This memo outlines the methodology and results of this analysis, using the process outlined in the Washington Department of Commerce's 2023 guidebook "Guidance for Updating Your Housing Element."¹

Land Capacity Analysis

Housing and Jobs Targets

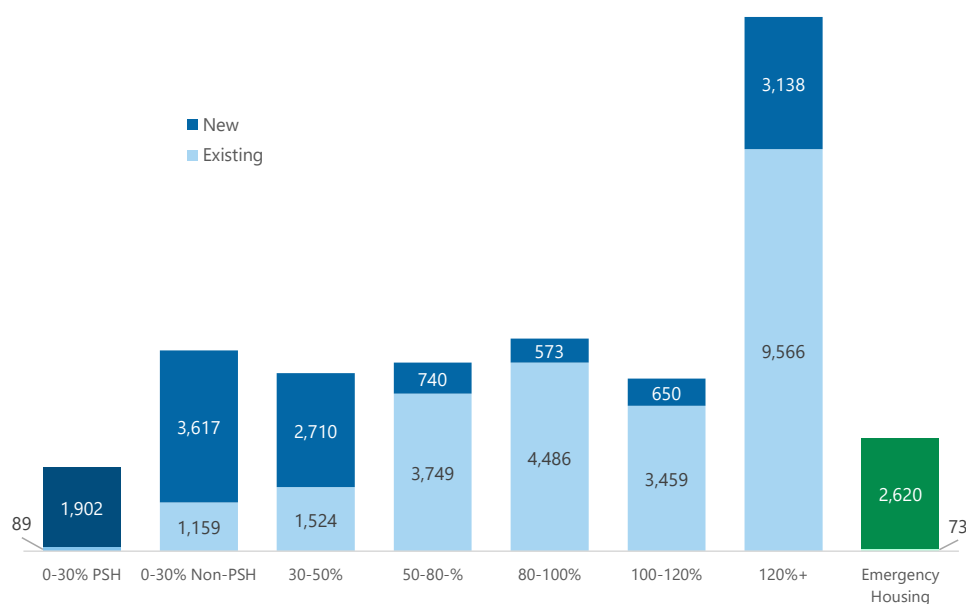
Shoreline is required to show **land capacity to meet 2044 targets for housing units and jobs** based on the Washington Office of Financial Management countywide projections as allocated to jurisdictions through the Countywide Planning Policies. As outlined in the 2021 King County Countywide Planning Policies, Shoreline must show capacity to accommodate **13,330 new Housing Units** and **10,000 new jobs** by 2044.

The housing unit targets are further broken down by what income band the housing units can serve, expressed as a percentage of the HUD Area Median Income (AMI). For reference, the 2023 AMI for King County used in this analysis was **\$146,500**. The AMI is determined by the U.S. Department of Housing and Urban Development (HUD), and is generally higher than the Census-reported Median Household Income for a given city, since it is a countywide metric and adjusted for household size. The HUD AMI is used to determine eligibility and income limits for subsidized affordable housing units.

The housing targets for families earning under 30% AMI are broken down into permanent units (i.e. standard housing units) and permanent supportive housing (PSH), defined in the Department of Commerce guidebook as "subsidized, leased housing for people who are experiencing homelessness or are at risk of homelessness and living with a disabling condition." Finally, each jurisdiction received a housing target for emergency housing, defined as "temporary accommodations for households who are experiencing homelessness or are at imminent risk of becoming homeless." Shoreline's housing baseline and 2044 targets by income band are shown below:

¹ <https://deptofcommerce.box.com/s/1d9d517g509r389f0mjpowh8isjpirlh>

Figure 1. Shoreline Existing and Target Housing Units by Income Band, 2019-2044



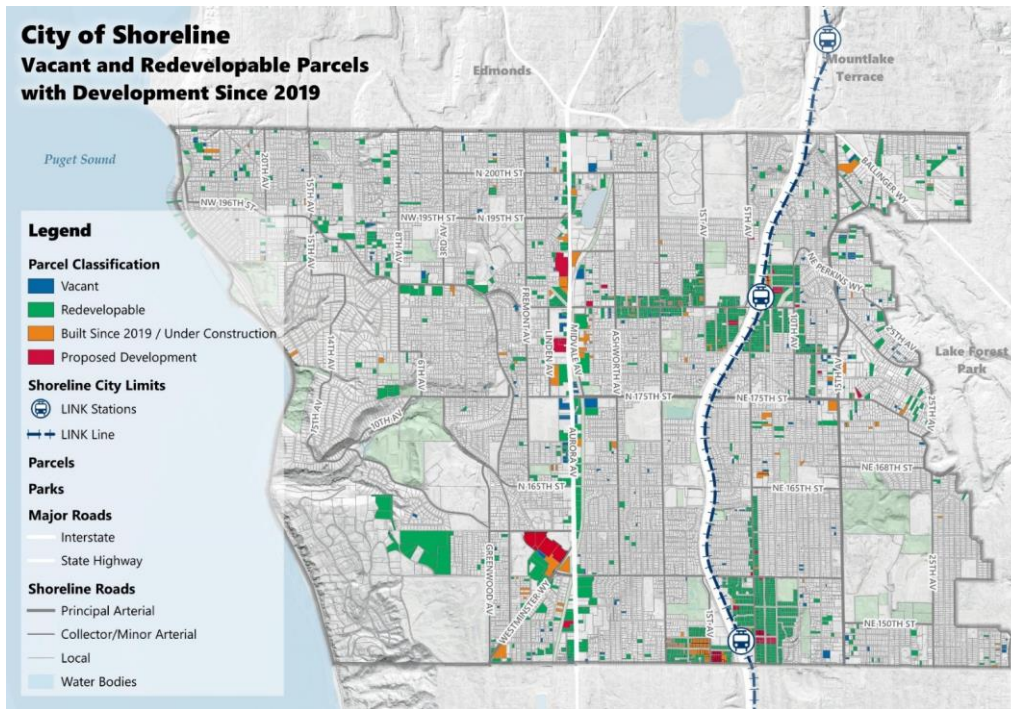
Source: 2021 King County Countywide Planning Policies (as amended 3/2023)

Vacant and Redevelopable Parcels and Pending Development

The first step in the land capacity analysis is to determine which parcels could accommodate new development over the 20-year planning horizon. King County provided GIS data from their Urban Growth Capacity Report classifying parcels in Shoreline as **vacant, redevelopable** (based on low building to land value ratio and other considerations), or **constant** (not likely to change over the next 20 years). Working with city staff, LCG refined the set of vacant and redevelopable parcels to account for planned and proposed development, some changes in land classification, and new development which has taken place since the County assessment. Additionally, environmentally constrained acreage within **stream buffers** and **steep slope areas** was excluded from the total parcel acreage of vacant and redevelopable parcels.

Next, development which has occurred since 2019 or is planned, proposed, or under construction was totaled. These new housing units and jobs **count towards the growth targets**, since the baseline established by King County was for 2019. The map below in Figure 2 shows the revised vacant and redevelopable classifications and parcels with recent or forthcoming development. This recent and forthcoming development totals **8,275 housing units and 183 jobs**.

Figure 2. Vacant and Redevelopable Parcels and Recent/Pending Development in Shoreline, 2023



Source: King County, City of Shoreline, Leland Consulting Group

Reduction Factor

Commerce's HB 1220 guidance indicates that jurisdictions should reduce the amount of vacant and redevelopable acreage by a reasonable amount to account for land which may not be available for redevelopment due to the need for new **right-of-way, public space, stormwater facilities, or other dedications**, as well as a reasonable estimate of the amount of land that will remain unavailable due to the **market**. The Department of Commerce suggests a minimum reduction of 15% for vacant parcels and 25% for redevelopable parcels. Using these as minimum deductions, LCG calculated an additional market factor based on recent development trends by zone in Shoreline to arrive at a reasonable estimate of redevelopment capacity in the city. The reduction factors are shown below in Figure 3.

Figure 3. Market Factor by Zone in Shoreline

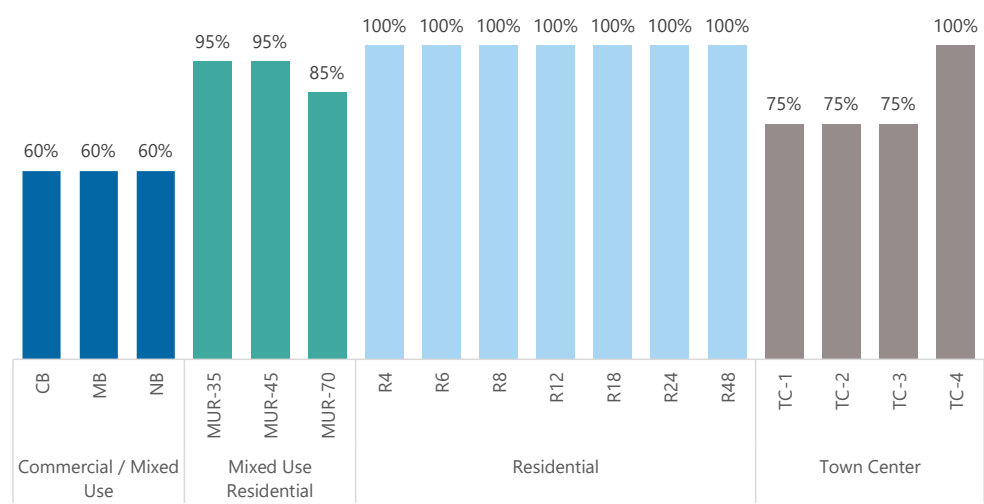
Zone	Vacant Parcel Acreage (less Critical Areas)	Vacant Reduction Factor	Net Vacant Acreage	Redevelopable Parcel Acreage (less Critical Areas)	Redevelopable Reduction Factor	Net Redevelopable Acreage
Commercial / Mixed Use						
CB	5.0	15%	2.6	4.6	25%	2.1
MB	6.8	36%	2.6	51.5	40%	18.6
NB	0.1	18%	0.1	10.0	25%	4.5
Mixed Use Residential						
MUR-35	0.6	45%	0.3	43.5	50%	20.8
MUR-45	0.7	15%	0.6	63.5	25%	45.2
MUR-70	0.5	35%	0.3	66.9	38%	35.0
Residential						
R4	0.4	75%	0.1	49.1	83%	8.3
R6	20.7	55%	9.4	65.1	60%	25.8
R8	0.3	15%	0.2	3.1	25%	2.3
R12	0.0	95%	0.0	4.1	95%	0.2
R18	0.0	15%	0.0	2.7	25%	2.0
R24	0.1	58%	0.0	4.0	64%	1.4
R48	0.0	61%	0.0	5.9	68%	1.9
Town Center						
TC-1	2.8	15%	1.8	6.0	25%	3.4
TC-2	6.4	15%	4.1	6.1	25%	3.4
TC-3	0.1	15%	0.1	13.1	25%	7.3
TC-4	0.5	15%	0.5	1.1	25%	0.8

Source: King County, City of Shoreline, CoStar, WA Department of Commerce, Leland Consulting Group

Housing and Job Density Assumptions

Having established the amount of available developable acreage, the next step in the analysis is to determine the share of this acreage which will redevelop as residential and nonresidential uses in each zone. This was based on recent and permitted development trends as well as input from Shoreline staff regarding future policy direction moving towards encouraging increased job growth in the city. Figure 4 below shows the percentage of net acreage in each zone assumed to redevelop as residential uses.

Figure 4. Share of Acreage Expected to Redevelop as Residential Uses by Zone in Shoreline



Source: CoStar, City of Shoreline, Leland Consulting Group

The next step was to estimate the density at which the residential acreage could redevelop. Following Commerce guidance, single-family zones are assumed to redevelop at the **maximum allowed density in the zoning code**. Note that additional capacity for middle housing and ADUs in low-density zones will be addressed at the parcel level later in this report. Housing unit density assumptions for multifamily zones are based on the **density of recent development** in that zone over the past five years. Representative recent or forthcoming projects used as prototypes in this analysis are shown below in Figure 5.

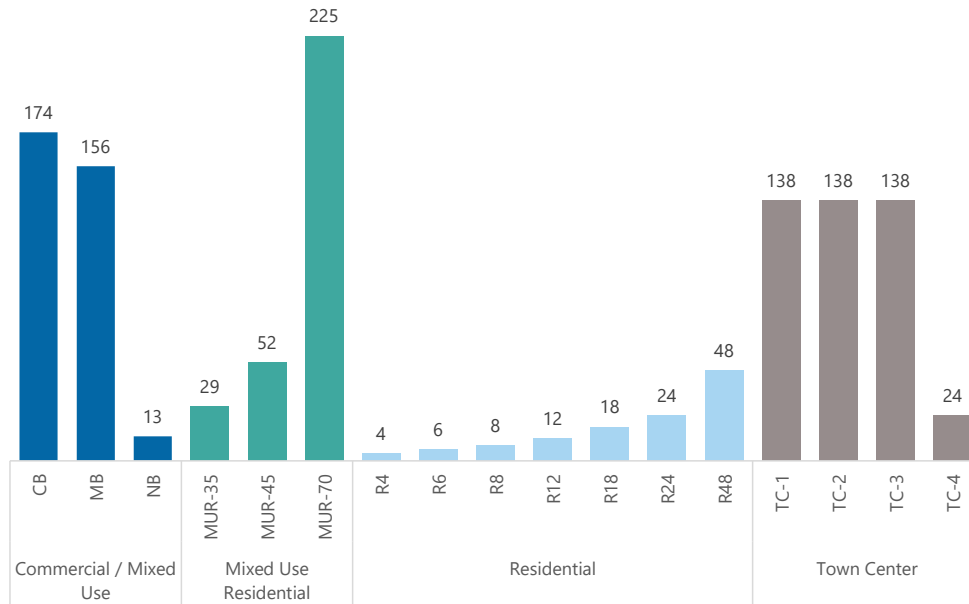
Figure 5. Prototype Developments Used in Capacity Analysis



Source: CoStar

Figure 6 below shows the housing unit density in dwelling units per acre assumed for each zone that allows housing. These densities were applied to the net vacant and redevelopable acreage shown above in Figure 3 to determine housing unit capacity in each zone.

Figure 6. Housing Density Assumptions for Shoreline Land Capacity Analysis (units/acre)



Source: Shoreline Zoning Code, CoStar, City of Shoreline, CoStar, Leland Consulting Group

Employment density was calculated in two steps. Shoreline has recently adopted an ordinance requiring ground floor commercial space in new multifamily residential development. Given this requirement, a number of regional developments in Shoreline and surrounding municipalities with ground floor commercial space were analyzed to determine an average job density of **10 jobs per acre** in this type of development. Representative examples are shown below.

Figure 7. Mixed-Use Employment Prototypes

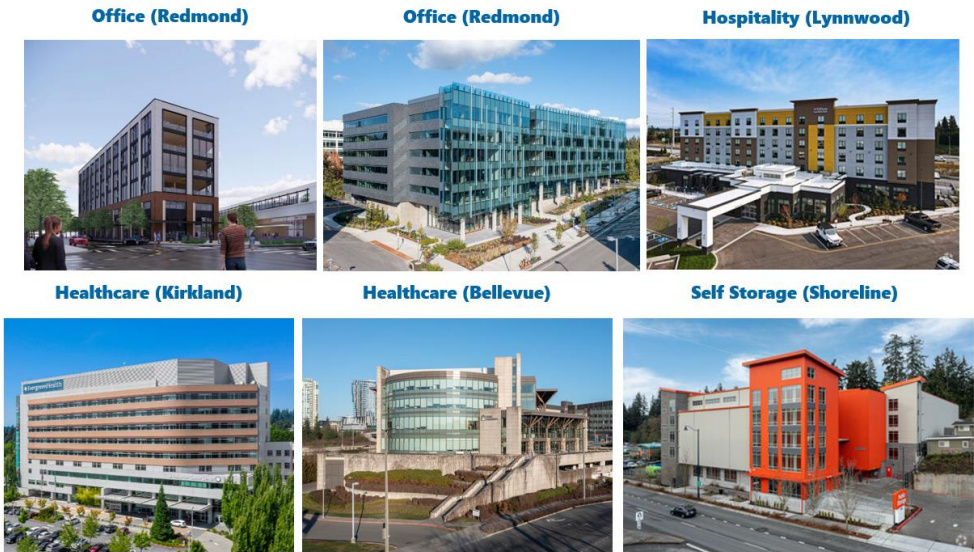


Source: CoStar

This job density was then applied to the expected acreage of mixed-use development in the CB, MB, NB, MUR-70, TC-1, TC-2, and TC-3 zones from the previous step, generating a total capacity of **946 jobs** in mixed-use buildings.

To estimate employment capacity on the expected nonresidential vacant and redevelopable acreage, **FAR** for regional prototypes for office, health care, hotel, and self-storage buildings were analyzed and then converted into **jobs per acre** using employment density assumptions from the King County Urban Growth Capacity Report. Regional prototypes analyzed and job density calculations are shown below. These prototypes and densities were then applied to the nonresidential available acreage by zone in various shares corresponding to potential future development patterns to determine potential employment capacity.

Figure 8. Regional Employment Prototype Examples



Source: CoStar

Figure 9. Employment Densities Used in Shoreline Job Capacity Analysis

	FAR	SF/Job	Jobs/Ac
Office	4.13	500	360
Health Care	1.15	500	100
Hospitality	1.15	500	100
Self Storage	2.98	20,000	7

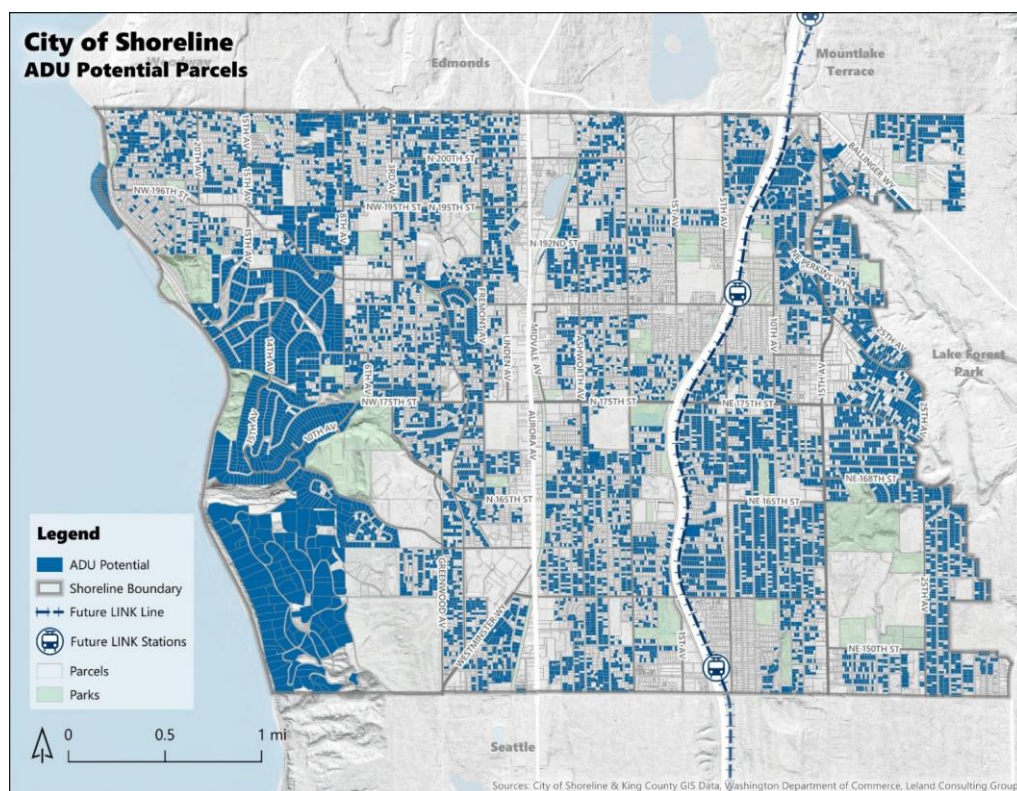
Source: CoStar, 2021 King County Urban Growth Capacity Report, City of Shoreline, Leland Consulting Group

Additional ADU Capacity

HB 1337, passed by the legislature in 2023, requires that cities allow two ADUs, detached or attached, on all parcels currently zoned for low-density residential (i.e. single-family). As part of this capacity analysis, LCG considered the additional housing capacity that this new legislation could create in Shoreline. Parcels in the existing single-family zones were considered for this analysis. The built square footage was first removed from the parcel acreage, and then the remaining acreage within the allowed lot coverage ratio (per the zoning code) was calculated. Assuming at least 1,000 square feet

would be required to construct an ADU, this resulted in a total of **7,737 parcels which have sufficient space for an ADU**. Based on Commerce guidance and regional trends, LCG assumed that **five percent** of homeowners might choose to develop an ADU over the planning horizon. Assuming that a small share of those might also choose to construct 2 ADUs given new legislation, averaging 1.2 ADUs per lot, this would result in an **ADU capacity of 464 units**. This would average out to about 19 ADUs per year, compared to 10.8 ADUs per year which have been permitted on average over the past five years, according to city data.

Figure 10. Potential ADU Parcels in Shoreline



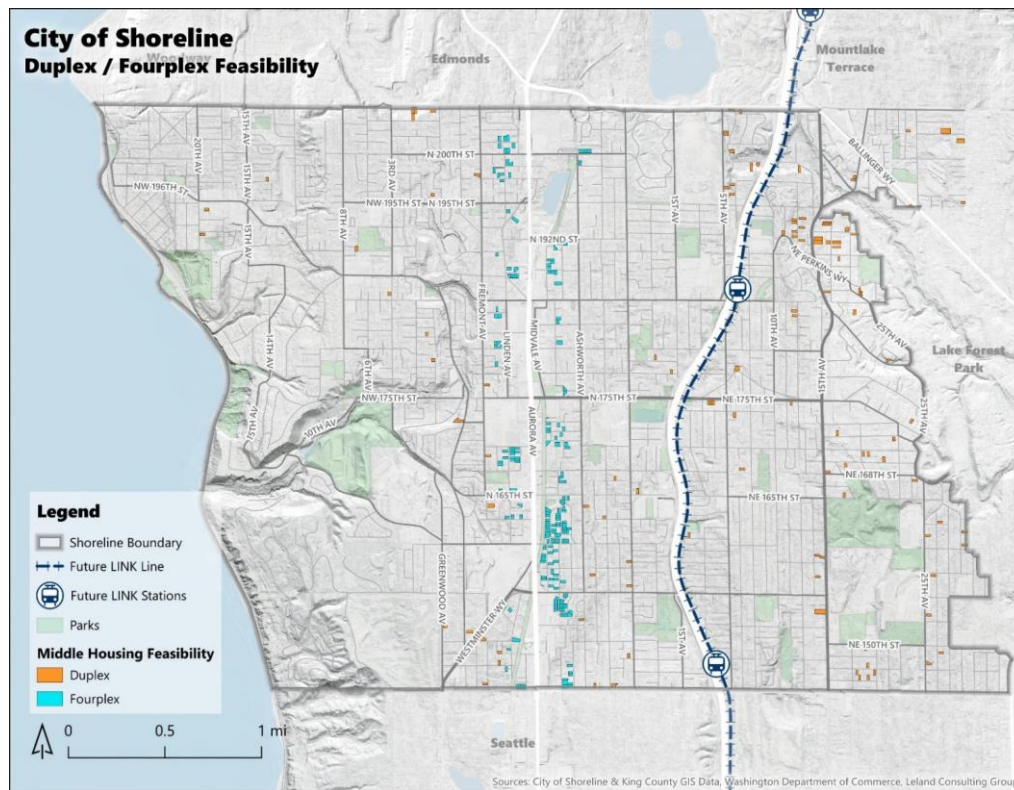
Additional Duplex and Fourplex Capacity

HB 1110, also passed by the legislature in 2023, requires that Shoreline allow two units on all lots in low-density residential zones, and four units near high-capacity transit. To determine the potential for added units, LCG conducted a high-level feasibility analysis of parcels in the city. Similar to the ADU analysis, the net buildable area within the allowed lot coverage was analyzed, with an assumption of at least 2,000 square feet of buildable area needed to construct a duplex. Next, potential sales prices and construction costs developed by the Department of Commerce's Pro Forma tool for middle housing were compared with the assessed value of each parcel to determine lower-value parcels where a developer could make a 15 percent rate of return after buying the parcel and redeveloping it as a duplex or fourplex. This analysis shows a total of **323 parcels where a duplex or fourplex would be feasible**, shown on the map below. Assuming that at most half

Commented [EK1]: Has this analysis been run with the revised land use map which expands the area of effect for 4-plexes?

of these properties might redevelop over the next 20 years yields a capacity of **384 additional units** of middle housing in the city.

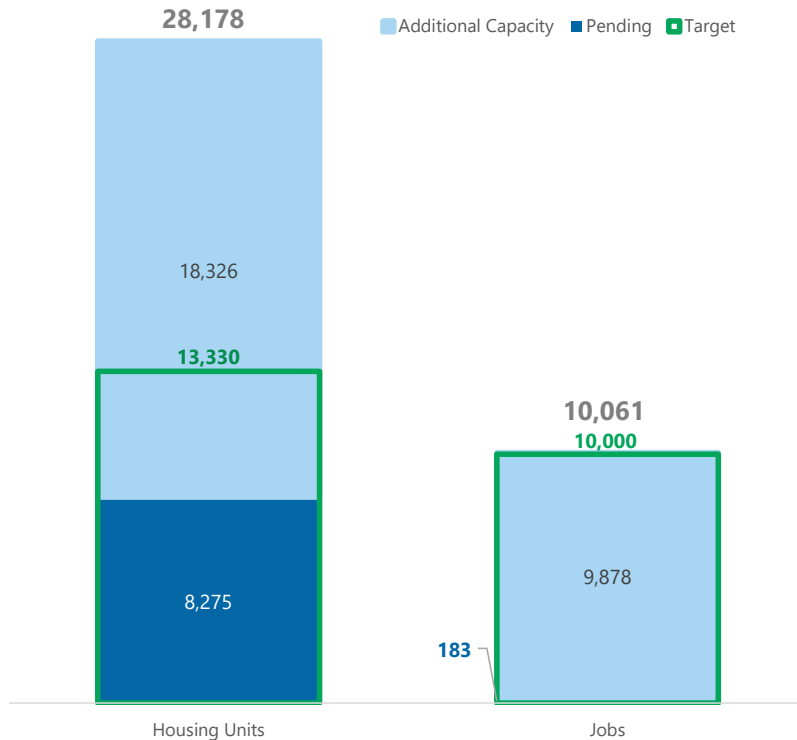
Figure 11. Potential Duplex/Fourplex Parcels in Shoreline



Overall Results

Figure 12 below shows the results of the housing and jobs capacity analysis. Pending units or jobs developed since the baseline and/or permitted but not yet constructed are shown in dark blue, and additional zoned capacity for housing and jobs calculated as detailed above is shown in light blue. Overall, **Shoreline has sufficient capacity to meet both housing and jobs targets, and to greatly exceed its overall housing target.** Although recent development has been very heavily weighted towards housing, given market demand, Shoreline does have adequate zoned capacity to meet the employment targets, particularly as markets shift in the coming decades and the city takes steps to encourage more job growth. As a result of new state legislation passed in 2021, the city must also break down the total housing capacity by the potential income bands served, detailed in the following section of this report.

Figure 12. Shoreline Housing Unit and Jobs Targets and Results, 2019(20)-2044

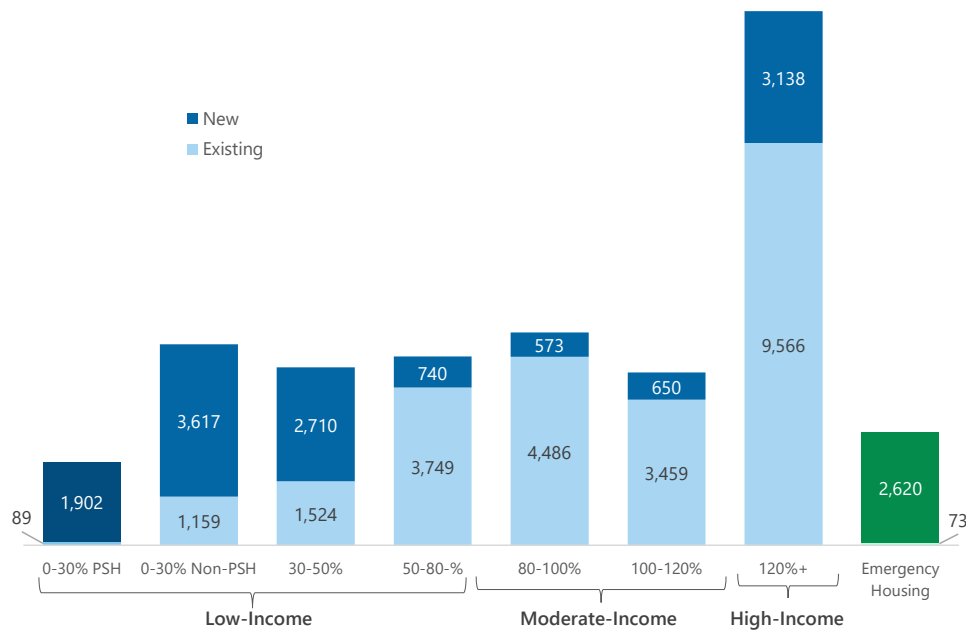


Housing Needs by Income Band

HB 1220 requires jurisdictions to analyze their housing capacity by what household income level the new units can serve. Each county establishes income-based targets for each city within the county, and the cities must then demonstrate that

they have sufficient land capacity for the number of units allocated in each income band, as well as capacity for emergency housing units. Shoreline's existing and target housing units for the 2019-2044 period are shown below in Figure 13.

Figure 13. Shoreline Existing and Target Housing Units by Income Band, 2019-2044



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

Pending Units by Income Band

The first step in this analysis is to break down the units which have been built since 2019, are proposed, or are under construction by the income level that they will serve. LCG analyzed existing average rents by zone and by unit size based on data from CoStar and corroborated with data from the Washington Center for Real Estate Research at the University of Washington. Average ownership housing prices from the WA Center were also analyzed. These rents and housing prices were then compared to the HUD Area Median Income (AMI) for the appropriate household size to determine what income levels (as a percentage of the AMI) could afford to rent or purchase housing in Shoreline without being cost-burdened (defined as spending more than 30 percent of

Income Categories

This analysis uses three main income categories:

Low-Income (Households earning under 80% AMI)

Moderate-Income (Households earning 80-120% AMI)

High-Income (Households earning more than 120% AMI)

household income on housing costs). The table below shows the breakdown of recent and planned units by income bracket and zone based on this analysis and city data on subsidized affordable units serving low-income households.

Figure 14. Breakdown of Pending (Recent and Planned) Units by Income Band

AMI	Pending Units
0-80%	1,791
80-120%	6,171
120%	313

Source: City of Shoreline, CoStar, WA Center for Real Estate Research, Leland Consulting Group

Land Capacity by Income Band

The next step in this analysis is to break down the land capacity for future units into income bands that those units could serve. Following Department of Commerce guidance, this is accomplished by grouping zones into **zone categories** based on the housing types that are allowed. This classification is shown below, along with the net unit capacity by zone:

Zone	Housing Types Allowed	Assigned Zone Category	Zone Capacity
Commercial / Mixed Use			
CB	Apartments and higher intensity mixed-use developments	Mid-Rise	802
MB	Vertical or horizontal mixed-use	Mid-Rise	3,213
NB	Medium and higher-density residential townhouses, and mixed-used types of development (buffer zone)	Moderate Density	59
Mixed Use Residential			
MUR-35	Detached and attached single-family, multifamily apartments up to 3 stories	Moderate Density	467
MUR-45	Attached single-family, multifamily apartments up to 4 stories	Low-Rise	2,131
MUR-70	Multifamily apartments up to 7 stories	Mid-Rise	7,714
Residential			
R4	Detached single-family and ADU	Low Density	30
R6	Detached single-family and ADU	Low Density	149
R8	Detached and attached single-family, duplex, triplex	Moderate Density	15
R12	Detached and attached single-family, duplex, triplex	Moderate Density	2
R18	Detached and Attached single-family, multifamily apartments	Moderate Density	30
R24	Detached and Attached single-family, multifamily apartments	Moderate Density	3
R48	Detached and Attached single-family, multifamily apartments	Low-Rise	60
Town Center			
TC-1	High intensity	Mid-Rise	714
TC-2	High intensity	Mid-Rise	1,037
TC-3	High intensity	Mid-Rise	1,022
TC-4	Detached and Attached single-family, multifamily apartments	Moderate Density	30

Commented [EK2]: In units

Following this classification, the zone categories are then aggregated and future capacity assigned to various income bands based on the zone category. Since some of Shoreline's zone categories can serve **multiple income bands**, an additional step was added at this point. The aggregated capacity in each zone category was broken down by income band based on the share of multifamily vs single-family/townhome development in each zone category in the past five years. Following commerce guidance and housing trends in Shoreline, multifamily capacity can potentially serve the 0-80% AMI category, whereas townhomes and single-family homes serve households earning over 120% AMI. This categorization and breakdown are shown below:

Figure 15. Zone Category and AMI Classification

Zone Category	Aggregated Capacity	Assumed % Single-Family/Townhome	120% AMI +	80-120 % AMI	0-80 % AMI
Low Density	179	100%	179	0	
Moderate Density	607	56%	340	266	
Low-Rise	2,190	41%	907	1,284	
Mid-Rise	14,501	0%			14,501
ADUs	464			464	
Additional Duplex/4-Plex Units	384		79	305	

Source: Leland Consulting Group

Finally, the housing targets by income band are compared with the above capacity breakdown by income band. In addition, pipeline/pending units are added in at this point to account for development which has occurred since 2019 and/or is permitted, planned, or under construction. The results are shown below in Figure 16.

Figure 16. Shoreline Housing Targets and Capacity by Income Band

Income Band	Housing Types	Housing Needs	Aggregated Housing Needs	Pipeline Units	Remaining Housing Needs	Total Capacity	Surplus/Deficit
0-30 PSH	Multifamily Units	1,902	8,969	1,791	7,178	14,501	7,323
0-30 Non PSH		3,617					
30-50		2,710					
50-80		740					
80-100	Triplexes, Fourplexes, ADUs, Condo Units, Higher-End Multifamily Units	573	1,223	6,171	-4,948	2,320	7,268
100-120		650					
120+	Single-Family, Townhomes, Duplexes	3,138	3,138	313	2,825	1,505	(1,320)
	Total	13,330	13,330	8,275	5,055	18,326	13,271

Source: Washington Department of Commerce, Leland Consulting Group

Overall, this analysis shows that Shoreline has sufficient overall housing capacity to meet its growth targets, as discussed in the previous section of this report. The GMA requires that cities show sufficient capacity for low- and moderate-income households – the 0-80% AMI and 80-120% AMI categories. **Shoreline has a significant surplus in both of these zone categories, satisfying the requirements of HB 1220.**

As shown above, Shoreline has a deficit of capacity in the 120% AMI category. **Statute does not require that this deficit be addressed through zoning**, and as noted previously, there is an overall surplus of zoned capacity for housing. However, the targets reflect an expectation for a larger influx of higher-income households into the city in the coming decades brought on by the increase in regional housing demand. Traditionally, these households have been served by single-family detached housing units at the higher end of the housing market. Due to the lack of available land for additional, new construction of single-family detached housing in Shoreline, these households may increase demand for existing housing stock that is currently serving lower-income levels, subsequently increasing their costs. In order to alleviate this cost pressure, and also due to the overall lack of single-family detached housing, households across the income spectrum may be forced to look to housing options in the other zone categories, such as duplexes, fourplexes, and higher-end apartments or condominiums, rather than in the more traditional single-family development patterns which have served higher-income households in the past.

Emergency Housing

RCW 36.70A.070(2)(c) requires that, in addition to land capacity for permanent housing, jurisdictions also show sufficient land capacity for their allocations of emergency housing as part of their comprehensive plan updates. This section outlines the methodology and results of this analysis, which is based on the Emergency Housing Land Capacity Analysis Option B (assumed density method) as outlined on pp. 44-48 of the WA Department of Commerce's "Guidance for Updating Your Housing Element" (August 2023).²

The use table in Shoreline Municipal Code Chapter 20.39.040 allows for "homeless shelter" in the CB, MB, and TC-1, 2, and 3 zones and "enhanced shelter" in the MB zone. "Homeless shelter" is defined as *"a facility operated within a building to provide short-term, temporary or transitional housing for individuals or families who are otherwise homeless and have no immediate living options available to them. Such facilities may provide support services, food, and other services as an accessory use."* "Enhanced shelter" is defined as *"a 24-hour-a-day facility which is open to adults experiencing homelessness regardless of prior criminal history, addiction or mental health challenges as long as the individual is able to live safely in the community with others and abide by established program rules. The purpose is to provide safe shelter and access to resources including, but not limited to, housing, basic needs, hygiene, case management and social programs as they transition to permanent housing."*

Per Commerce guidance, this analysis considers parcels in these zones which were classified as "Vacant" or "Redevelopable" in the overall land capacity analysis as detailed above. Shoreline does not have any intensity or spacing requirements for emergency housing which would limit the number of these potential parcels that could be used. After removing critical area acreage as detailed previously, the total net area in these zones available for emergency housing is **102.5 acres**.

This acreage is then multiplied by a density assumption for potential emergency shelters, measured in beds per acre. The density assumption is based on a combination of prototypes drawn from the Commerce guidebook which most closely match staff expectations for the types of potential emergency housing that could be developed in Shoreline under current zoning. Details and densities on the prototypes used and the percentage of each prototype used in generating the average density assumption of **33 beds per acre** are shown below.

² <https://deptofcommerce.box.com/s/1d9d517g509r389f0mjpowh8isjpirlh>

Figure 17. Density Prototypes for Shoreline Emergency Shelter Land Capacity Analysis

Name	Location	Details	Density			
			Beds	Acres	(beds/acre)	Percentage
Serenity of House of Clallam County	Port Angeles	Clustered 2 story buildings, parking, open spac	70	1.89	37	10%
Benedict House	Bremerton	2 story SF home conversion	24	0.21	128	5%
North King County Enhanced Shelter	Shoreline	1 story former nursing home, parking, open sp	60	2.66	23	75%
The Gateway	Seattle	3 story former hotel with parking	135	2.25	60	10%
Average Density for LCA:					33	100%

Source: WA Department of Commerce, City of Shoreline, Leland Consulting Group

Applying this density assumption to the available acreage by zone results in a capacity for **3,417 beds** on vacant and redevelopable parcels in zones where emergency housing is allowed in Shoreline, as broken down below in Figure 18. In addition, Shoreline has seen 60 shelter beds in The Oaks completed in 2021, per city staff. Since this occurred after the 2020 baseline, these 60 beds are added in the "Pending" category below, for a total capacity of **3,477 beds** in the 2020-2044 horizon.

Figure 18. Emergency Shelter Capacity by Zone in Shoreline, 2020-2044

Zone	Number of Sites	Gross Acres	Critical Area Acres	Net Acres	Beds / Acre	Emergency Shelter Bed Capacity
CB	34	9.7	0.0	9.7	33	322
MB	95	61.4	3.1	58.3	33	1,945
TC-1	7	8.8	0.0	8.8	33	295
TC-2	21	12.5	0.0	12.5	33	417
TC-3	14	13.1	0.0	13.1	33	439
TOTAL	171	105.6	3.1	102.5		3,417
Pending	1					60
TOTAL	172					3,477

Source: WA Department of Commerce, City of Shoreline, Leland Consulting Group

Shoreline's target for emergency housing is 2,620 beds, as shown in the target allocations above in Figure 18. Therefore, the city has a **surplus capacity of 857 shelter beds** for the 2020-2044 planning period, as shown below in Figure 19.

Figure 19. Emergency Shelter Capacity and Target in Shoreline, 2020-2044

Total Emergency Shelter Need (Beds)	Total Emergency Shelter Capacity (Beds)	Surplus/Deficit
2,620	3,477	857

Source: King County, WA Department of Commerce, City of Shoreline, Leland Consulting Group

Adequate Provisions

In addition to this analysis by income band, HB 1220 also requires cities to show that their housing element "[m]akes adequate provisions for existing and projected needs of all economic segments of the community." This analysis requires a

comparison of the historic rate of housing production to the rate of housing production needed to meet housing targets by income band. The results of this analysis are shown below in Figure 20, using historic production data from the City, Census building permit survey, and PSRC's Income-Restricted Housing Inventory. Similar to the analysis above, the income levels are correlated with housing types based on LCG's analysis of housing prices affordable to various income levels in Shoreline. As shown below, historic production trends indicate sufficient production overall to meet targets for low- and moderate-income housing.

Figure 20. Historic and Target Housing Production Trends in Shoreline, 2012-2023

Income Band	Yearly Need	Historic Yearly Production	Barrier Exists?
0-30 PSH			
0-30 Non PSH	287	639	No
30-50			
50-80			
80-100	-198	20	No
100-120			

However, Commerce guidance also requires that cities disaggregate the lower income bands and analyze recent production of 0-50% AMI units as well as emergency housing. This analysis, shown below, indicates that Shoreline has as shortfall of production compared to the amount that would be needed to meet targets for these housing types.

Figure 21. Historic and Target Housing Production Trends in Shoreline, 2012-2023

Income Level	Projected Housing Need	Annual Unit Production Needed	Historic Average Annual Unit Production	Barrier Exists?
Emergency Housing/Shelter	2620	105	0	Yes
0-30% PSH	1,902	76	32	Yes
0-30% Other	3,617	145	11	Yes
30-50%	2,710	108	15	Yes

Source: King County, City of Shoreline, U.S. Census Building Permit Survey, PSRC Income-Restricted Housing Inventory

In order to address this shortfall, Commerce has developed a checklist for cities to address four categories of barriers to housing production:

- Development regulations
- Process obstacles
- Limited land availability and environmental constraints
- Funding gaps

Cities should document how these barriers may be affecting the production of units at the income level specified using this checklist, and document the potential steps they could take to overcome the barriers. Note that cities do not need to implement these steps as part of the comprehensive plan update, but they can help guide goal and policy development and cities will be required to produce a report documenting their progress towards increasing housing production five years after the adoption of the comprehensive plan.

These checklists and potential actions to remove barriers to housing production are found in Appendix A.

APPENDIX A: Adequate Provisions Checklists and Potential Actions to Remove Barriers to Housing Production

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Exhibit B2: Low-Rise or Mid-Rise housing barrier review checklist (30%-50% AMI)

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
DEVELOPMENT REGULATIONS			
Unclear development regulations	Yes	Regulations can be difficult to find within the code - affordable housing requirements and incentive programs can be found in multiple places.	Create a more centralized place for base zone, affordable housing, and incentive program information.
High minimum lot sizes	No	There are no minimum lot sizes in the MUR zones. R-12 to R-48 zones have a minimum lot area of 2,500 SF.	
Low maximum densities or low maximum FAR	No	MUR zones do not have a maximum density and TC-4's density is based on bulk limits. R-zone density ranges from 4 units per acre to 48 units per acre. There is a 50% bonus density for projects that include units available below 80% AMI.	
Low maximum building heights	Yes	The R-48 and MUR-35 zones have a maximum height of 35 feet. This allows for roughly three stories of development, significantly limiting what can be built on site and negatively impacting feasibility, particularly for affordable housing.	Increase height limits to allow for at least four stories in R-48 and MUR-35 zones.
Large setback requirements	Yes	The MUR zones require higher front setbacks on 145th Street (22 ft) and 185th Street (15 ft) than on other streets and arterials in Shoreline. It is not clear why these larger setbacks are required on these streets.	Consider reducing the setbacks on these streets to either the arterial (0 ft) or non-arterial (10 ft) standard.

Commented [JS4]: Action 2.1.2
They have also implemented an IZ program in the MUR zones (Action 2.1.3)

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
High off-street parking requirements	No	For multifamily housing, parking requirements range from 0.75 to 1.5 spaces per unit depending on the number of bedrooms. Up to a 25% reduction is allowed near high-frequency transit.	The City could consider waiving the requirement that 20% of shared garage spaces be EV-ready in housing intended for those making below 50% AMI
High impervious coverage limits	No	In R-18 to R-48, TC-4, NB, and MUR zones maximum hardscape ranges from 85% to 90%.	
Lack of alignment between building and development codes	No	Building and development codes appear to align	
Other (for example: ground floor retail requirements, open space requirements, complex design standards, tree retention regulations, historic preservation requirements)	No		
PROCESS OBSTACLES			
Conditional use permit process			
Design review	Yes	Design Review is only required for specific cases, such as departures from standards, the Deep Green Incentive Program, and developments in MUR-70 exceeding the base height without utilizing the significant tree retention height incentive or Deep Green height incentive. Design review is required for projects exceeding base height in MUR-70 zones for affordable housing.	Consider waiving design review for affordable housing taller than 70' in the MUR-70 zone.
Lack of clear and accessible information about process and fees	No	Information about process and fees is within the development code.	
Permit fees, impact fees and utility connection fees			

Commented [JS5]: Waiver for affordable housing? (Action 2.2.4)

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Process times and staffing challenges			
SEPA process	No	While this is not a planned action area, the SEPA barriers are not higher than in other jurisdictions. However, the SEPA process does add time and expense to projects, impacting the feasibility of affordable housing.	
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS			
Lack of large parcels for infill development			
Environmental constraints			

Exhibit B3: Supplementary barrier review checklist for PSH and emergency housing

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
DEVELOPMENT REGULATIONS			

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
Spacing requirements (for example, minimum distance from parks, schools or other emergency/PSH housing facilities)³	yes	Enhanced shelters must be located with frontage on a principal arterial within a quarter mile of a transit stop	Allow enhanced shelters where other shelters or PSH would be allowed
Parking requirements	maybe	Submittal of a parking plan acceptable to the City prior to occupancy. Typical parking requirements are 0.75-1.5 spaces per unit, with up to a 25% reduction near transit.	Emergency housing and PSH should not require on-site parking, especially near transit. City should ensure that parking plans requiring fewer spaces are not rejected
On-site recreation and open space requirements	no	Larger of either 800 SF or 50 SF/dwelling unit is required for open space in all multifamily projects.	
Restrictions on support spaces, such as office space, within a transitional or PSH building in a residential zone	no	Office is allowed in the same zones as shelters and PSH	
Arbitrary limits on number of occupants (in conflict with RCW 35A.21.314)	yes	While there do not appear to be specific density requirements in the zones where this type of housing is allowed, there is a cap of 100 residents for enhanced shelters.	Allow the number of residents to be determined by building envelope and/or availability of services
Requirements for PSH or emergency housing that are different than the requirements imposed on housing developments generally (in conflict with RCW 36.130.020)	yes	A 6-foot fence is required to be built around enhanced shelters in residential areas	Do not require a fence around the perimeter

³ Note that RCW 35A.21.430 expressly states requirements on occupancy, spacing, and intensity of use may not prevent the siting of a sufficient number of permanent supportive housing, transitional housing, indoor emergency housing or indoor emergency shelters necessary to accommodate each code city's projected need for such housing and shelter under RCW 36.70A.070(2)(a)(ii). The restrictions on these uses must be to protect public health and safety.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
Other restrictions specific to emergency shelters, emergency housing, transitional housing and permanent supportive housing	Ground floor commercial	The zones in which shelters are allowed require 75% of lineal frontage on the ground floor to have commercial space.	While this is not specific to affordable housing or shelters in these zones, it could be a significant challenge, especially for shelters.