	Shelter	
	Capacity	
	(Beds)	
1,127	2,485	1,358

## **Adequate Provisions**

In addition to the analysis by income band, cities are also required 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 multifamily production data from CoStar and middle housing permit data from the Census.

Figure 20. Historic and Target Yearly Production in SeaTac

Income Band	Annual Unit Production Needed	Historical Average Annual Unit Production 2012-2024	Barrier Exists?
0-30 PSH 0-30 Non PSH 30-50 50-80	55	95	No
80-100 100-120	54	2	Yes

Source: King County, CoStar, Census Building Permit Survey, Leland Consulting Group

As shown, there is no barrier to production of multifamily units overall, but there are potential barriers to production of middle-income units (i.e. middle housing and ADUs). Therefore, per Commerce guidance, the checklist addressing these potential barriers is included below. Additionally, even though there is not a demonstrated barrier to the production of units serving households earning 0-80 percent AMI overall, Commerce guidance suggests that cities should complete the checklist provided in the Commerce Housing Element Guidebook to ensure that there are not barriers to the production of subsidized units being produced in the 0-80 percent AMI category, nor to the production of Emergency Housing units. This checklist documents such potential barriers and the actions that the city could take to overcome them. 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.

The adequate provisions checklist and potential actions to remove barriers to middle-income, low-income and emergency housing production are found below:

**Exhibit B1: Moderate Density housing barrier review checklist** 

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	No	Development regulations are clear	
Prohibiting some moderate density housing types, such as:  Duplexes Triplexes Four/five/six-plexes Townhomes Cottage housing Live-work units Manufactured home parks	Yes	Under current code, duplexes and townhomes are the only typologies allowed in the medium and lower density residential zones and duplexes are only allowed within townhouse developments. Neither are allowed in the UL zone. Mobile Home Parks are only allowed by right in the MHP zone and are not allowed in the T zone. Mobile homes are allowed in the UM zone, but not mobile home parks.	Legalize moderate density housing types in residential zones as required by statewide regulations.
High minimum lot sizes	Yes	The minimum lot size for duplexes and townhomes is 14,400 square feet (0.33 acres)	Do not employ minimum lot size requirements beyond what is allowed for single family detached housing.
Low maximum densities or low maximum FAR	No	Allowed density for townhomes and duplexes is 10-24 du/ac in-within urban centers-village/station area boundaries and 10-18 du/ac in all other neighborhoods. This density would typically allow for duplex or townhome construction.	If the city intends to legalize or encourage denser product types like cottage housing or mobile home parks, increase the allowed density. In addition, SeaTac should follow new state regulations regarding middle housing density requirements.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Low maximum building heights	Maybe	The maximum building height is 35 feet for duplexes and townhomes.	While 35 feet should be sufficient for duplexes and townhomes, the City should ensure that height limits are not lower for middle housing than for other housing allowed in the specific zone.
Large setback requirements	Yes	The minimum front setback outside of urban centers is in single family zoned areas is 15-20 feet	This will limit the types of middle housing that can be built on site.
High off-street parking requirements	Yes	Outside of the City Center Overlay District, duplexes are required to have 1.25 spaces per du, while townhomes are required to have 2.25 spaces per dwelling unit. Multifamily requirements vary by number of bedrooms, from 1 to 2 spaces. Mobile homes must have 2 spaces per dwelling unit.	The City could reduce parking requirements for middle housing to no more than 1 per unit.  Note that the City is currently conducting a parking study to assess parking needs for new development.
High impervious coverage limits	Maybe	The maximum <u>building</u> lot coverage for townhomes and duplexes is 55 percent.	Maximum lot coverage requirements should not be lower for middle housing than for other allowed housing types.
Lack of alignment between building codes and development codes	No	There is alignment between building and development codes	
Other (for example: complex design standards, tree retention regulations, historic preservation requirements)	No	There are no other regulations specific to middle housing	

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
PROCESS OBSTACLES			
Conditional use permit process	No	Conditional use permits are only required for multifamily in NB zones and mobile home parks in UM, UH, and UH-UCR zones	
Design review	No	Design review is not required	
Lack of clear and accessible information about process and fees <sup>3</sup>	No	Information about the process and fees is available	
Permit fees, impact fees and utility connection fees	Maybe	Fees do not seem out of line with what is typical, but it is not clear which fees would apply specifically to middle housing types.	Ensure that fees are not atypically high compared with neighboring jurisdictions.  Note that the city is conducting a fee schedule study to ensure consistency with regional fees. Impact fees and stormwater utility connections will be evaluated as part of the forthcoming Middle Housing Code Update in 2025.
Processing times and staffing challenges	No	Local developers and permit customers have commented that SeaTac's permitting process is	

<sup>&</sup>lt;sup>3</sup> For example: guidance resources are unclear or difficult to find, no digital permit tracking system, staff do not provide fee estimates or permitting time estimates are unavailable or inaccurate.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		efficient and faster than neighboring cities.	
SEPA process	No	See above comment.	
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS	Yes	There is limited land available for infill or greenfield development in residential neighborhoods in SeaTac	Ensure that where there is available land, regulations permit development of middle housing types.
Lack of large parcels for infill development	Yes	SeaTac has a number of large parcels that could support infill development, but these are currently primarily used as park-and ride-fly facilities. They could support higher density housing in the future but are unlikely to be redeveloped in the near term, and are also unlikely to be used for middle housing.	Ensure that where there is available land, regulations permit development of middle housing types.
Environmental constraints	No	Although there are environmental challenges associated with the airport, there are not significant topographical environmental constraints.	

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

	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
DEVELOPMENT REGULATIONS			
Spacing requirements (for example, minimum distance from parks, schools or other emergency/PSH housing facilities) <sup>4</sup>	Yes	Facilities are not allowed to be closer than 1,750 feet from a school, park, library, community center, or other emergency shelter facility	Spacing requirements will be reduced to the Commerce guidance minimum on 880 feet.
Parking requirements	No	Parking requirements are determined through the approval process, based on number of residents and site conditions	
On-site recreation and open space requirements	No	There are no on-site recreation or open space requirements beyond what would typically be required in each zone	
Restrictions on support spaces, such as office space, within a transitional or PSH building in a residential zone	Yes	Social service offices are only allowed outright in NB, O/C/MU, O/CM, CB, CB-C, RBX, and I zones	Ensure that zones where permanent supportive housing, CRF-I, and emergency housing are permitted also allow social service offices

<sup>&</sup>lt;sup>4</sup> 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.

	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
Arbitrary limits on number of occupants (in conflict with RCW <u>35A.21.314</u> )	Yes	Emergency housing and emergency shelters are not allowed to exceed 80 residents (or one adult bed per 250 square feet of floor area) in residential zones	Density limits should not be more restrictive than the zone typically allows.
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	Conditional use permits are required for CRF-I and emergency housing facilities in zones where multifamily is permitted outright. They are always required for PSH that includes more than 5 residents and 2 caregivers.	Ensure that permanent supportive housing follows the same requirements as multifamily housing.
Other restrictions specific to emergency shelters, emergency housing, transitional housing and permanent supportive housing	No	There are on other specific restrictions	