

# Lake Forest Park Comprehensive Plan Emergency Housing Land Capacity and Code Changes

Date September 4, 2024  
To Mark Hofman, City of Lake Forest Park  
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## Background

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 considerations for potential code updates required by Lake Forest Park, as well as an analysis of potential capacity for emergency housing based on those code changes.

## Zoning Update Considerations

Currently, Lake Forest Park's municipal code does not explicitly allow emergency housing, emergency shelter or permanent supportive housing. Per changes made to state law in 2021 (RCW 35.21.683 and RCW 35A.21.430), "*city codes cannot prohibit indoor emergency housing or indoor emergency shelters in areas where hotels are allowed unless the community has already permitted such development in more than 50% of their zones within one mile of transit. Cities must also allow permanent supportive housing and transitional housing in all areas zoned for hotels and all areas zoned for residential dwellings.*" Cities must also allow Permanent Supportive Housing (PSH) in all residential zones. Cities are also prohibited from imposing most spacing, intensity, and occupancy limits on these housing types. **Therefore, Lake Forest Park will need to make revisions to its code to allow these uses.**

Commerce's recent **STEP Model Ordinance, User Guide, and Best Practices Report** (July 2024) contains background, model code language, and definitions which can assist the city in making the necessary code changes. The Commerce guidance contains code-ready definitions of "emergency housing," "emergency shelter" and "permanent supportive housing", as well as a wealth of background information and best practices for consideration. LCG recommends the City consult this document to assist in updating the specific definitions and code language around these uses.

In Lake Forest Park, hotels are currently allowed in the CC zone, and "temporary lodging" (which has the same definition as a hotel per LFPMC 18.08.352) is allowed in the TC zone. The CC zone is comprised of only one fully developed parcel, and the TC zone comprises the city's Town Center area. Because development of emergency housing in the CC zone is essentially impossible, and the TC zone has already undergone an extensive planning process envisioning a mixed-use development, it is unlikely that emergency housing or shelter will develop in either of these areas. However, LCG recommends that the city add emergency housing and emergency shelter to the use tables for these zones to comply with state law. Additionally, LCG recommends that the city consider allowing these uses in the SG-C zone, a zone where multifamily development is allowed and where the Land Capacity Analysis conducted as part of the Comprehensive Planning process has found a reasonable amount of potential redevelopable parcels. The proximity to transit, to denser areas in Seattle, and to an area where the City already envisions future potential for multifamily development make the SG-C zone a logical place to allow emergency housing and emergency shelter, should the demand arise for such a facility in the City.

## Land Capacity for Emergency Housing

As part of Lake Forest Park’s housing allocations through the HB 1220 process, as determined by King County and set forth in the 2021 King County Countywide Planning Policies (amended August 15, 2023), Lake Forest Park must show land capacity for 166 emergency shelter beds. Since emergency housing and emergency shelter are currently not allowed in any zones, the current capacity in the city is 0 beds. In order to assess potential compliance with this requirement, LCG analyzed the potential for emergency housing in two zones: TC (since hotels are allowed in this zone) and SG-C (potentially a more logical place for emergency housing as discussed in the previous section of this memo). Although hotels are allowed in CC, this zone was not analyzed since the only parcel with this zoning designation is fully developed. This analysis was 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).<sup>1</sup>

Per Commerce guidance, this analysis considers parcels which were classified as “Vacant” or “Redevelopable” in the overall land capacity analysis conducted by LCG as part of this comprehensive plan update. This analysis assumed that Lake Forest Park will not adopt any intensity or spacing regulations on emergency housing or shelter.

The analysis first takes the developable acreage (outside of critical areas) from the TC and SG-C zones, and then multiplies this acreage 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 Lake Forest Park under current zoning. Details and densities on the prototypes used and the percentage of each prototype used in generating the average density assumption of 31 beds per acre are shown below.

Figure 1. Density Prototypes for Lake Forest Park Emergency Shelter Land Capacity Analysis

Name	Location	Context	Zoning	Details	Density			
					Beds	Acres	(beds/acre)	Percentage
Tri-City Union Gospel Mission	Pasco	Urban	Light Industrial	1 story, parking, open space	162	6.30	25	50%
Serenity of House of Clallam County	Port Angeles	Suburban	Residential Moderate Density	Clustered 2 story buildings, parking, open space	70	1.89	37	50%

Source: WA Department of Commerce, Leland Consulting Group

Applying this density assumption to the available acreage by zone results in a capacity for 908 beds on vacant and redevelopable parcels in zones where emergency housing is allowed in Lake Forest Park, as broken down below in Figure 2.

Figure 2. Potential Emergency Shelter Capacity by Zone in Lake Forest Park with Proposed Changes, 2020-2044

Zone	Net Acres	Beds / Acre	Emergency Shelter
			Bed Capacity
SG-C	11.7	31	363
TC	17.6	31	545
<b>TOTAL</b>	<b>29.3</b>		<b>908</b>

Source: WA Department of Commerce, City of Lake Forest Park, Leland Consulting Group

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

Commented [A01]: Add citation to whatever appendix that ends up in

Lake Forest Park's target for emergency housing is 166 beds. Therefore, if emergency housing and emergency shelter were allowed in these zones, the city would have a surplus capacity of 742 shelter beds for the 2020-2044 planning period, as shown below in Figure 3.

Figure 3. Emergency Shelter Capacity and Target in Lake Forest Park, 2020-2044

Total Emergency Shelter Need (Beds)	Total Emergency Shelter Capacity (Beds)	Surplus/ Deficit
166	908	742

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

Note that based on this analysis, the city could satisfy its emergency housing allocation by allowing these uses in **either** the TC or SG-C zones alone, or in both. However, if the City were not to allow emergency housing in the TC zone, by state law, hotels would also need to be removed as an allowed use in TC.

Commented [AO2]: @David Fiske seemed worth mentioning. We can discuss if you think we should expand upon this point. For example, if they allow it ONLY in TC, that is fine, and that's the only meaningful zone that allows hotels. However, if they DON'T want to allow it in TC and only allow it in SG-C, given their general reticence to touch TC, it seems they will also have to disallow hotels in TC....etc.