

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 housing typologies and development feasibility. This report includes this analysis, and includes:

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

Though this work is a separate effort, this study was conducted in parallel as part of the City's Comprehensive Plan update. The Housing Needs Assessment conducted as part of this planning effort helped inform the potential for 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.

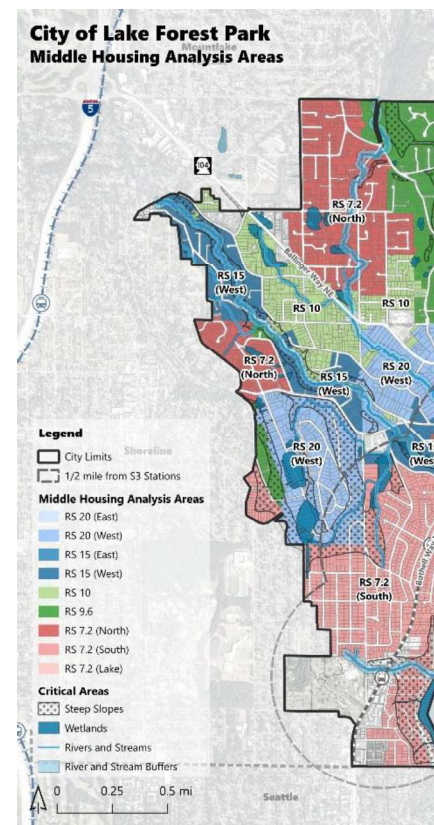


Lake Forest Park Neighborhood Characteristics

- **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 residential zones in Lake Forest Park to determine what types of middle housing could be built on parcels of various sizes and with differing environmental constraints. Due to the large size of the city, **a wide variety of housing types are possible across the city's residential neighborhoods.**



Implementation Considerations

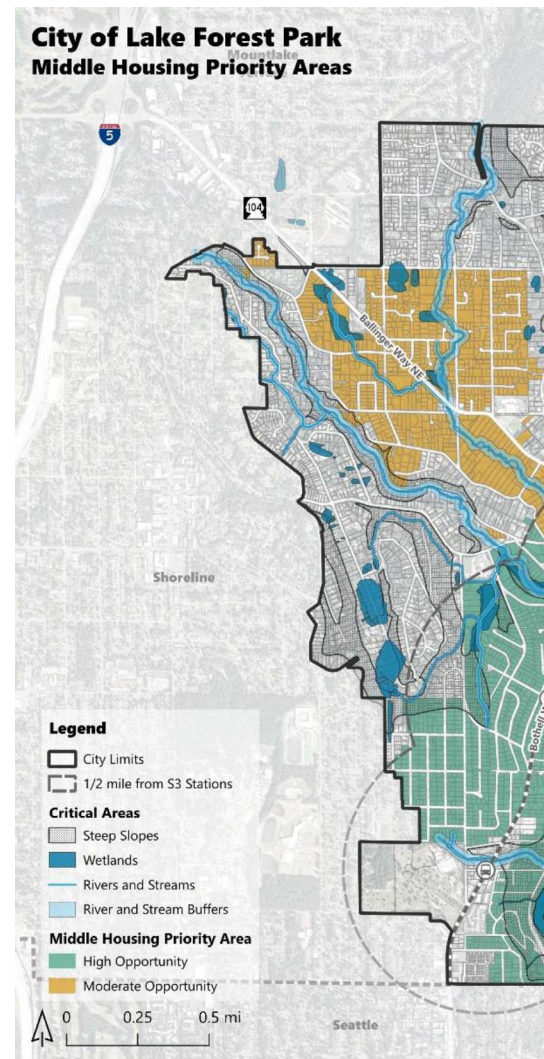
Location

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



Source: City of Lake Forest Park, Leland Consulting

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 heights that are adequate for most middle housing types. There is an opportunity to increase the allowed building heights to avoid conflicts between housing types.

Recommendation for consideration:

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

Lot coverage

The prevalence of large lots in Lake Forest Park makes the feasibility of a wide variety of middle housing types. Current lot coverage standards are a major constraint.

Recommendation for consideration:

Raising the allowed lot coverage to 50 percent would significantly increase the feasibility of middle housing 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 middle housing, it should implement the Washington Model's recommended FAR bonuses for Tier 1 and Tier 2.

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 front setback, preventing lot divisions that would result in smaller lots. Combining flexible middle housing regulations with lot division requirements would help promote homeownership opportunities.

Recommendations for consideration:

Lake Forest Park should consider allowing smaller lots with reduced street frontage to promote homeownership and wealth building opportunities on large lots.

Accessibility

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

Recommendations for consideration:

Lake Forest Park should require that some of the higher-density middle housing, such as four-unit townhomes, meet accessibility or visitability standards 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 the City to exempt up to 25 percent of its lots from inclusionary requirements. However, this must be weighed against the Racially Disparate Impacts of excluding middle housing areas.

Recommendations for consideration:

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

HB 1110 AND MIDDLE HOUSING

Middle Housing Feasibility and Recommendations **DRAFT**

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 a lot that is predominantly residential.
- HB 1110 also allows cities to follow a "Compliance Path", which would allow up to 25% of its residential parcels to be exempt from the criteria, such as being located in a certain zone. However, the City would be required to conduct a Racially Disparate Impacts (RDI) analysis and other considerations.
- The main types of middle housing include triplexes, fourplexes, fiveplexes, sixplexes, courtyard apartments, and cottages. Lake Forest Park is only required to allow triplexes, fourplexes, and fiveplexes. The City is encouraged to allow a wider variety of housing in targeted areas to promote greater housing diversity and opportunity.
- There are a wide variety of benefits to allowing middle housing in all residential zones. Middle housing fits well into established neighborhoods, promotes affordable housing (and affordable homeownership), helps reduce patterns of segregation, and aligns with the City's 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.

Middle Housing Feasibility and Recommendations **DRAFT**

Alternative Compliance Path

Cities have the option to pursue an “Alternative Requirements” compliance path for HB 1110, RCW 36.70A.635(4). This alternative permits the density requirements outlined above to apply to only a portion of parcels in the city primarily dedicated to detached units, rather than to all such lots (or a certain percentage less) of parcels excluded from the density requirements. Exclusions include but are not limited to:

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

There are also requirements for parcels within a city that are in the “at least” 75 of lots which are subject to the density requirements. These include:

- Any areas for which the exclusion would result in disparate impacts or result in zoning that has a discriminatory effect;
- Any areas within one-half mile walking distance of a major transit stop;
- Any areas historically covered by a restrictive covenant or restriction excluding racial minorities from property or living in the area, as known by 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.

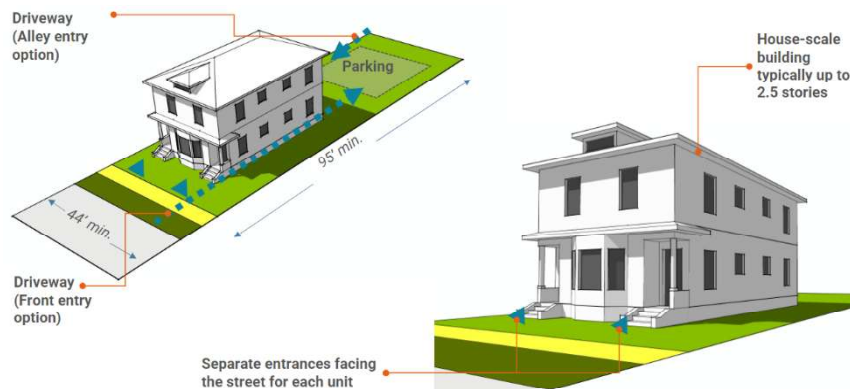
Additional information on middle housing types, including more details on the typologies and graphics shown in this section, are provided by the [WA Department of Commerce](#).

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



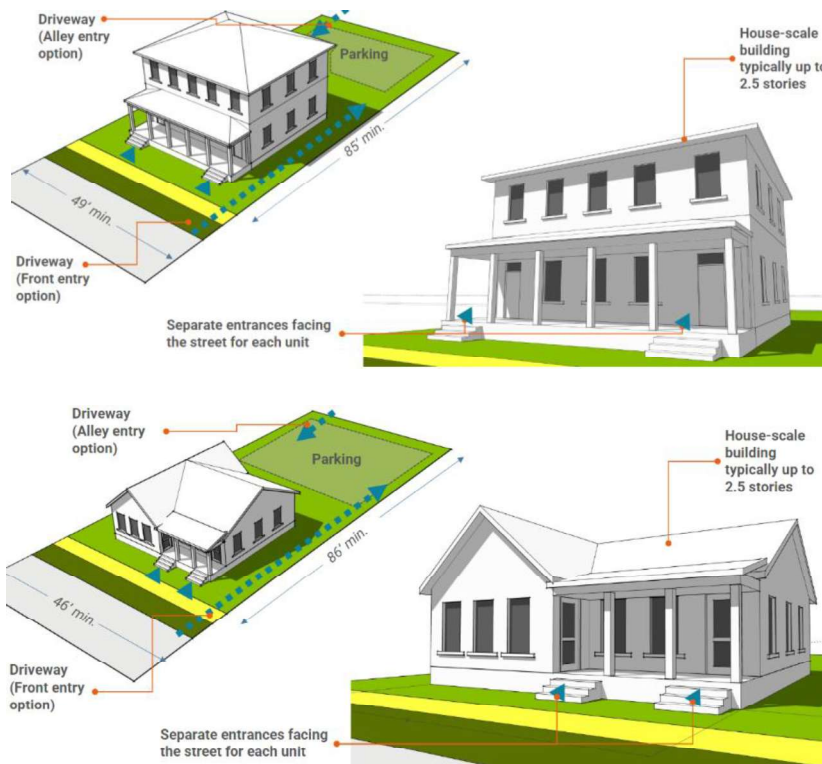
Source: Washington State Department of Commerce ([Link](#)).

Figure 3. A Stacked Duplex in the Wallingford Neighborhood



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](#))

Middle Housing Feasibility and Recommendations **DRAFT**

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



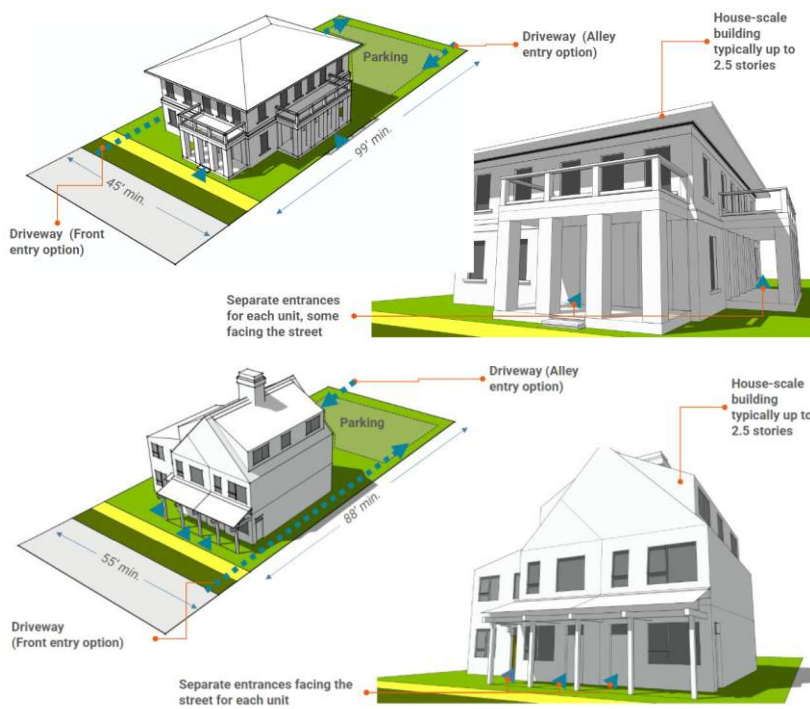
Figure 6. A Two-Story Side-by-Side Duplex in the Albemarle neighborhood, Portland, OR (Source: Sinclair Construction ([Link](#))).



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

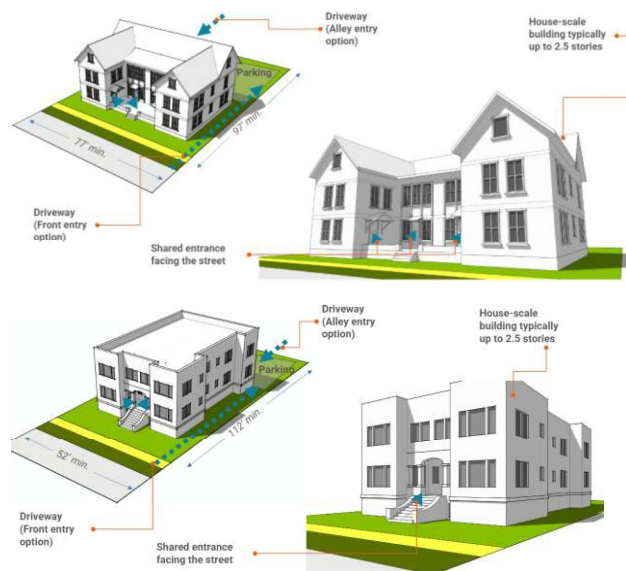


Source: CoStar.

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. A Sixplex Building in the Eliot Neighborhood of Portland, OR



Source: CoStar.

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

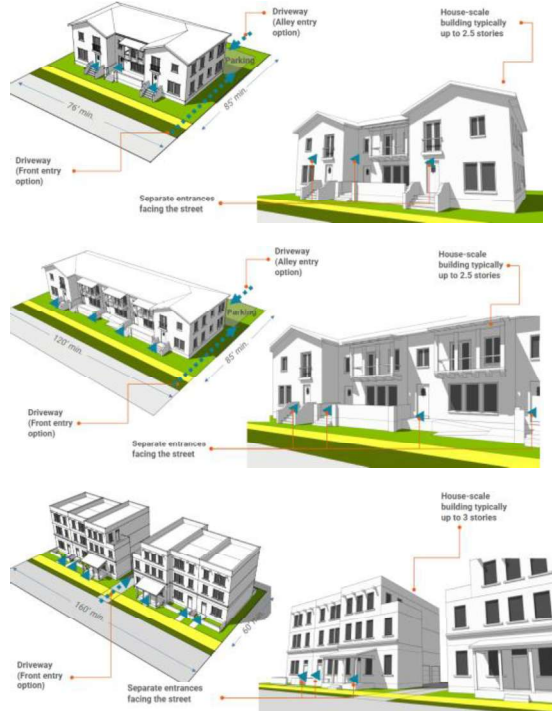


Source: CoStar.

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](#)).

Middle Housing Feasibility and Recommendations **DRAFT**

Figure 21. Townhouses in Everett, WA



Source: CoStar.

Figure 22. Townhouses in Bellevue, WA



Source: CoStar.

Figure 23. Rainier View Townhouses in Burien, WA



Source: CoStar.

Figure 24. Townhouses in OR

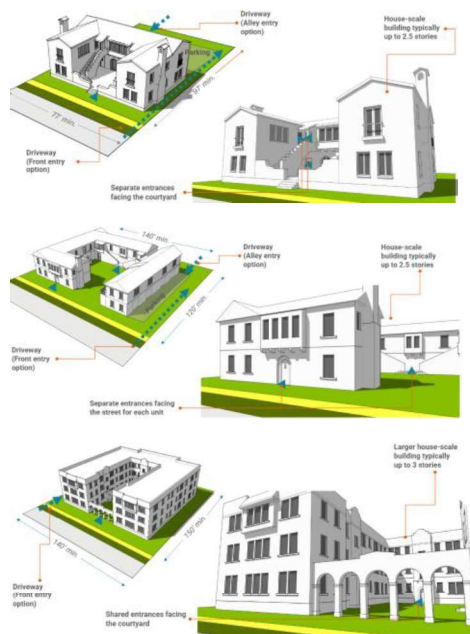


Source: CoStar.

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 Housing in the Irvington Neighborhood of Portland, OR



Source:

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](#)).

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



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

Figure 31. The ... in Tukwila, WA



Source: The ...

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.

Middle Housing Feasibility and Recommendations **DRAFT**

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.

Middle Housing Feasibility and Recommendations **DRAFT**

Partner with Affordable Homebuilders

Affordable homebuilders, including nonprofit organizations and land trusts, are experts in the feasibility of different housing types they develop, as well as the subsidies potentially needed for different product types. They are also in regular contact with 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 address them. The City can then take the information gleaned from these conversations with these organizations to update the City Code enables the types of housing that reflect local needs and economic realities.

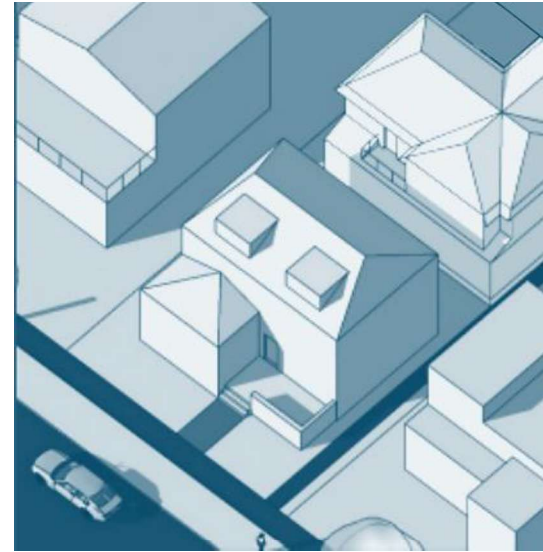
Incentivize Affordable Housing Development

The City has an opportunity to create incentives for affordable housing directly within its middle housing program. This can be in the form of bonuses – extra units allowed on a lot if a development includes some number of affordable units. Financial incentives like waivers for System Development Charges (SDCs) or permitting fees. The park can also work with affordable housing developers to ensure they are adequately calibrating these bonuses. If the incentives are not sufficient to make affordable housing construction viable, the City will not get any new affordable homeownership 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

Establish an Affordable Homeownership Source

The construction of affordable homeownership has been largely undertaken by nonprofits such as Community Development Financial Institutions rather than by city governments. However, many cities have been targeted to larger affordable housing projects, such as multi-unit apartments. To support the affordable homeownership 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 homeownership or 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 allows for low intensity building on lots that are adjacent to critical areas and buffers. Depending on the middle housing strategy the City chooses to implement, it could consider allowing small duplexes or other middle housing types through this process.
- There are currently 22 middle housing units in Lake Forest Park's single-family zones. While not all are allowed under current zoning regulations, these units fit in with the surrounding context and scale and offer examples of how middle housing could look in the future.
- LCG analyzed existing parcels in five representative areas of Lake Forest Park to determine what middle housing types of various sizes and with differing environmental constraints. Due to the large size of the city, a wide variety of housing types could fit in different parts of the neighborhoods.

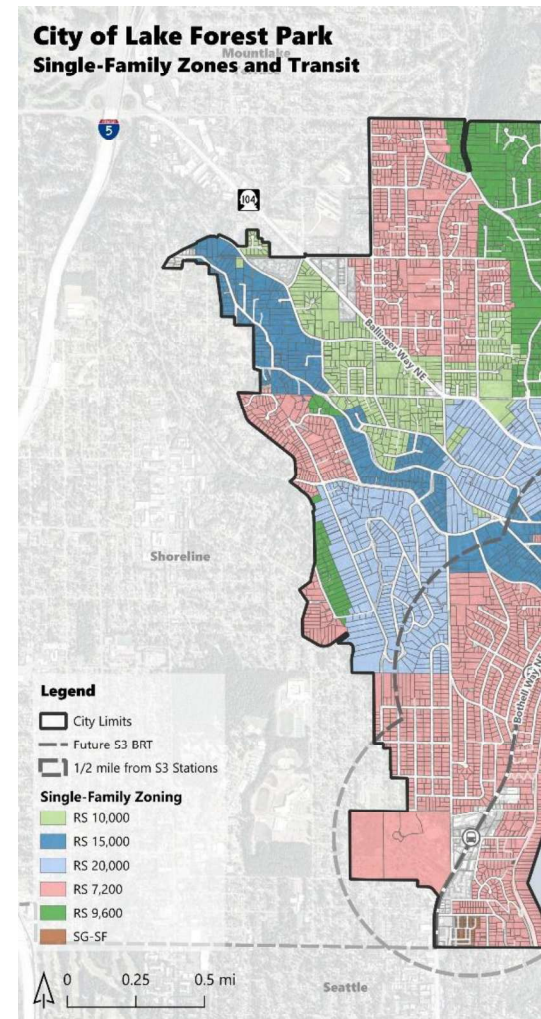
Lake Forest Park's Residential Zones

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 ADUs¹
- Manufactured housing
- Signs
- Type 1 day care facilities

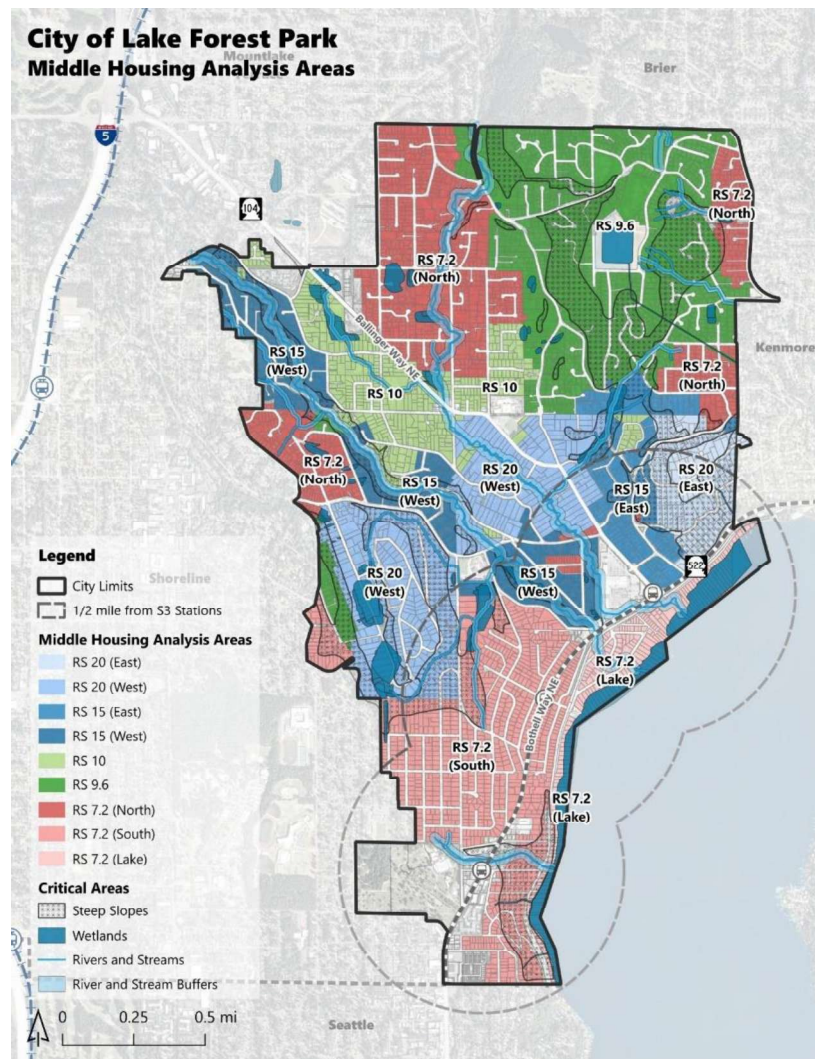
These zones are spread throughout Lake Forest Park with lot sizes roughly corresponding to various geographic and environmental constraints, with larger lots in areas containing wetlands, creeks, and steep slopes, and smaller lots in relatively flatter parts of the city. For this analysis, the RS-20, 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.

¹ 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 1331. Regulations will need to take effect by June 30, 2021, with the GMA.

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



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

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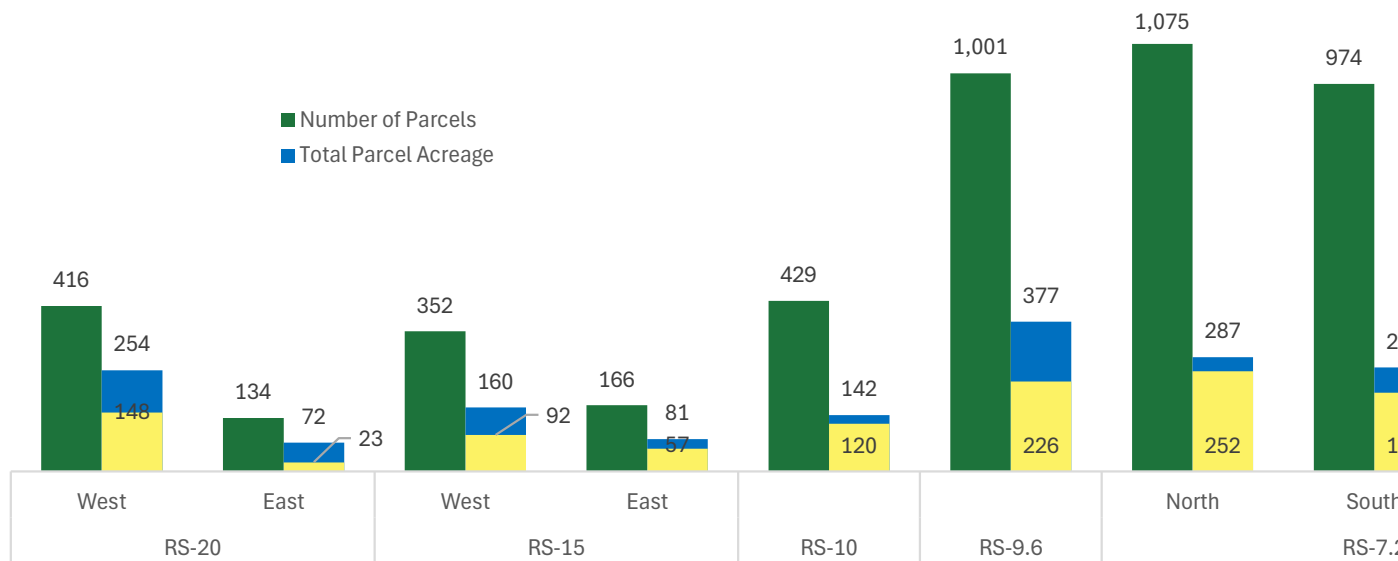
- The **RS-20 (West)** and **RS-15 (West)** zones consist of lots which back up onto creeks and are located in sloped areas.
- The **RS-20 (East)** parcels are also subject to significant stream constraints.
- The **RS-15 (East)** cluster is more uniform in its layout, without creek areas.
- The **RS-10** zone has relatively uniform lot sizes and smaller stream areas.
- The **RS-9.6** zone is found in the northern part of the city and contains significant areas with steep slopes, a dense suburban road network and layout with many cul-de-sacs and few through roads.
- The **RS-7.2 (North)** clusters are similar to the RS-15 in their typical subdivision layouts though they are more spread out than found in the RS-9.6 zone.
- The southern part of the city has two distinct residential zoning, a large, relatively flat area in the south (RS-7.2 (South)) with a more conventional street network, and a narrow area adjacent to the lake (RS-7.2 (Lake)), with lakefront properties and irregular neighborhood layouts near the shoreline where some existing ADUs and micro-units have been observed.

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 more acreage outside of critical areas, particularly in the North and South areas. The highly sloped RS-10 zone is relatively unconstrained, as are the North and South areas. More than half of the RS-9.6 zone is primarily by steep slopes, and much of the RS-7.2 Lake area is at or beyond the shoreline and is 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

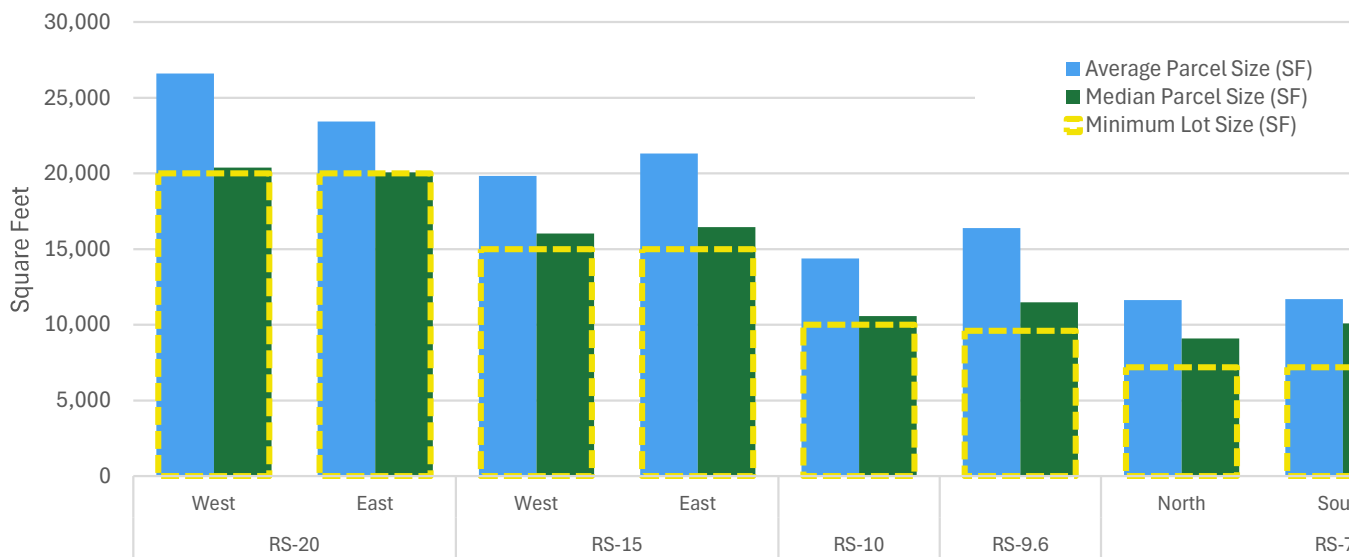
	RS-20		RS-15		RS-10	RS-9.6	North
	West	East	West	East			
Stream Buffer (Ac)	28.8	0.0	50.5	1.9	13.0	21.4	22.7
% Stream Buffer Area	11%	0%	32%	2%	9%	6%	8%
Wetland (Ac)	20.1	0.3	11.9	2.3	9.8	5.8	10.6
% Wetlands	8%	0%	7%	3%	7%	2%	4%
Steep Slope (Ac)	67.8	49.4	42.1	23.0	5.1	131.6	6.6
% Steep Slopes	27%	69%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

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)



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Although the median lot sizes in the analysis areas are generally larger than the minimum allowed lot size, there are also nonconforming lots in the city that are smaller than the zoned minimum size. Figure 38 shows the percentage of parcels in each analysis area that are smaller than the minimum lot size. If a current parcel is subdivided, these lots would not be allowed under the new minimum lot sizes. The areas with the smallest minimum lot sizes have more nonconforming parcels, likely reflecting the intention of the zoning to discourage further development in those areas. The 15 zones with more significant environmental constraints, slopes and creeks. The smaller zones have more nonconforming lots, particularly the RS 7.2 South area, which has a more traditional grid pattern with very uniform lot sizes.

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

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

In addition to lot size, there are current limits on lot coverage – the percentage of the parcel area covered by buildings. The maximum lot coverage by buildings in **Error! Reference source not found.** In some zones together, about 6 percent of lots currently exceed the maximum lot coverage. In most zones, the share of lots is around 5 percent, but there are some Lake areas have about 10 and 15 percent coverage where the built square footage exceeds the maximum lot coverage of 35 percent, as shown below in **source not found.** with a detail map of those areas.

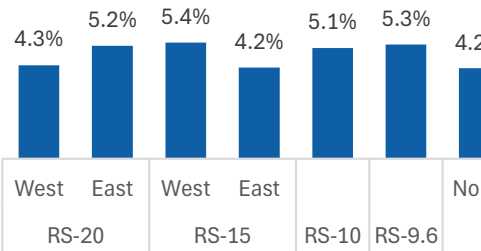
Figure 40. The existence of these numerous nonconforming uses suggests that this minimum lot size may be overly restrictive compared with development patterns already being seen in Lake Forest Park.

Figure 38. Maximum Lot Coverage by Zone

RS-20	25%
RS-15	27.5%
RS-10	30%
RS-9.6	30%
RS-7.2	35%

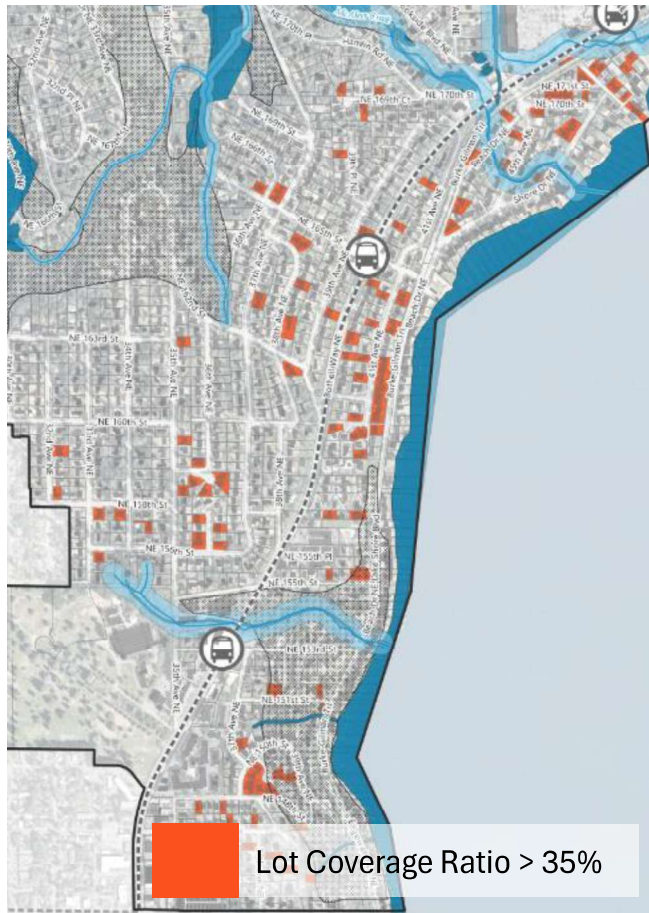
Source: City of Lake Forest Park, King County, Leland Consulting Group

Figure 39. Percentage of Lots Exceeding Maximum 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

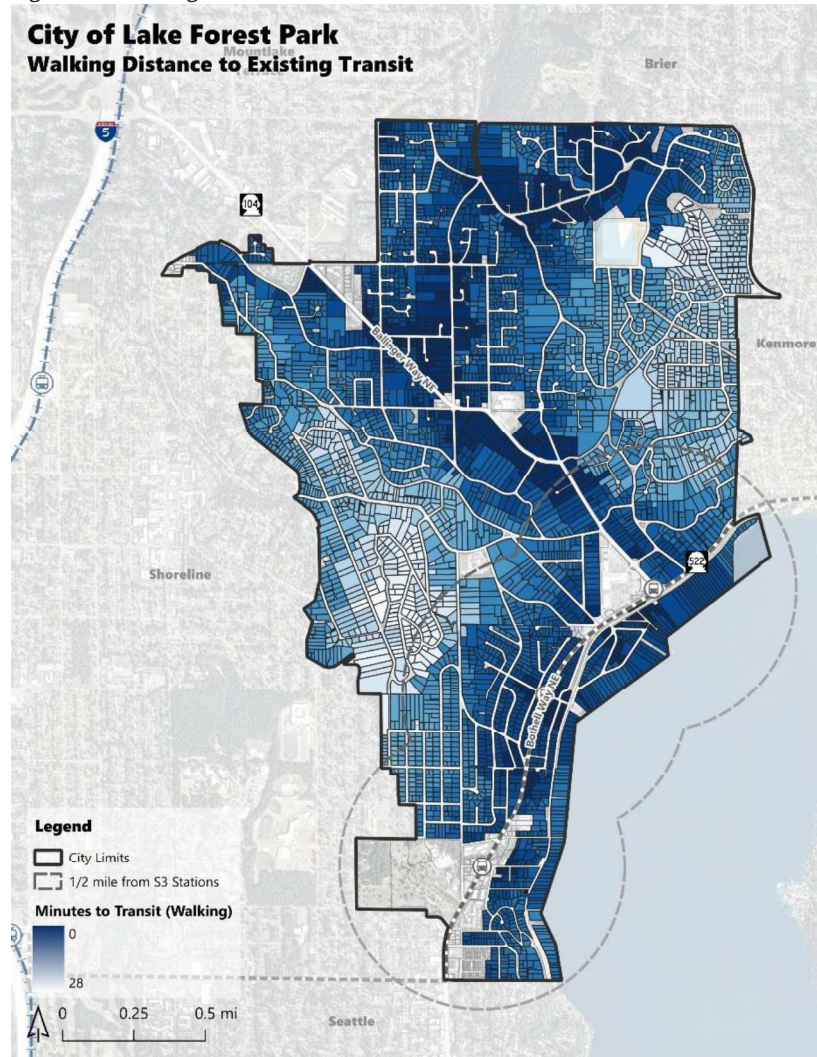
When considering potential locations for middle housing, one important factor to consider is non-motorized access to employment and transit.

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.

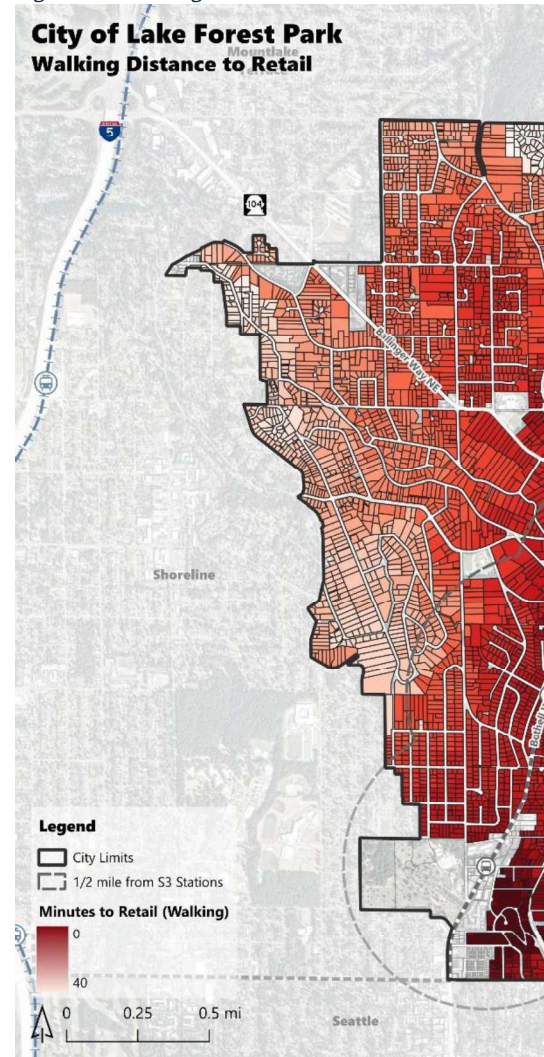
On the other hand, the areas near the Town Center, adjacent to Bothell Way and to the Burke-Gilman Trail, and in the south of the city near the border with Seattle show high pedestrian access to retail amenities, and the Ballinger Way corridor also shows proximity to current transit service. The S3 Bus 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:

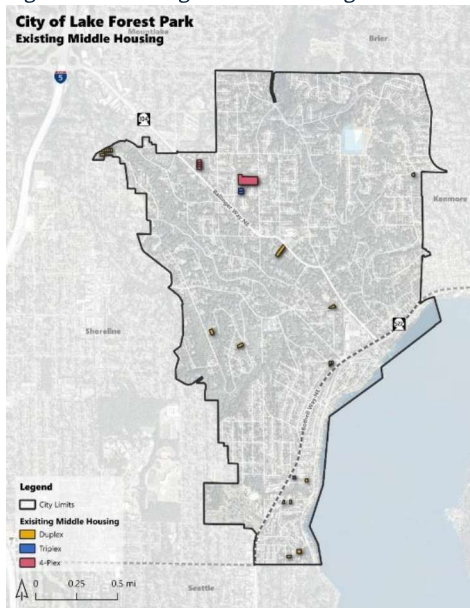
- Application of critical area regulations deny all reasonable economic use of the property
- There is no other reasonable economic use with less impact
- There is no unreasonable threat to public health, safety, or welfare
- Alterations are the minimum necessary to allow for economic use
- The inability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

Because of the size limits and minimum income requirements, it is unlikely that middle housing would be granted a reasonable economic use exemption. However, the City could potentially allow a small duplex with a footprint no greater than 750 square feet (the equivalent of a home with a 500 square foot footprint and 250 square foot attached garage) to qualify for the exemption. Duplexes do not have a substantial environmental impact than single family homes. A 2,000 SF duplex could accommodate moderate density, two-bedroom units. Because exemptions are a discretionary decision by the hearing officer, the City would retain control over the process and ensure that development is within an appropriate context.

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 3600 Zone are shown in the figures below. The duplexes and triplexes in particular demonstrate existing middle housing types which blends in architecturally with surrounding single-family homes and retains a similar scale to adjacent single-family homes.

Figure 44. Duplexes in RM 3600 Zone



Source: Google Maps

Figure 45. Duplexes in RM 3600 Zone



Source: Google Maps

Figure 46. Duplex in RS-7.2 Zone



Source: Google Maps

Figure 47. Duplex 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

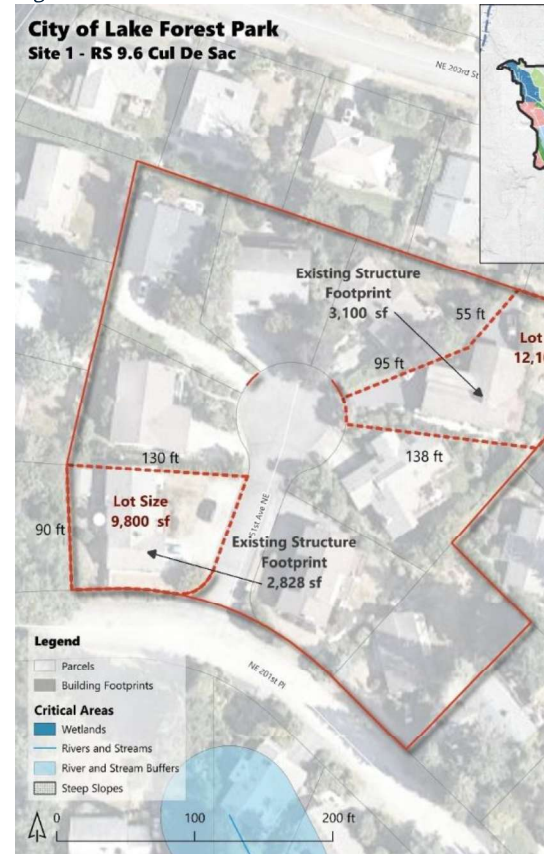
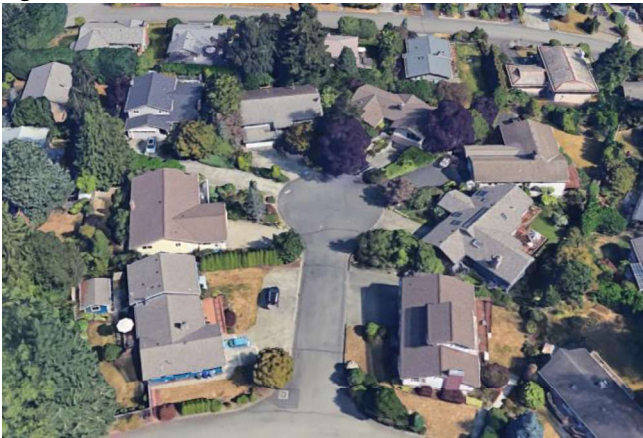


Figure 49. Street View of 51st Avenue NE from NE 201st Place



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



Source: Google Maps.

Because of the shape of the existing structure on the 12,100 square foot lot, it is unlikely that an additional ADU could be built on site. However, an ADU could be feasible on the rear portion of the 12,100 square foot lot. Because of the narrow width of the street-fronted lot, setbacks could potentially be adjusted to allow for middle housing toward the rear of the lot.

	9,800 Square Foot Lot
Infill Opportunities	Internal Conversion
Redevelopment Opportunities	Duplex (side by side or stacked) Triplex Fourplex Fiveplex Sixplex Townhouse (up to 3) Courtyard Building

Site 2: RS 10 Grid North

The RS 10 zoned site in Figure 51 below is located at NE 189th Place and 37th 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 189th Place takes up approximately 33% of the land area, while the structure on the 10,245 square foot lot facing NE 188th Street takes up 25% of the land area.

Figure 51. RS 10 Grid North Site

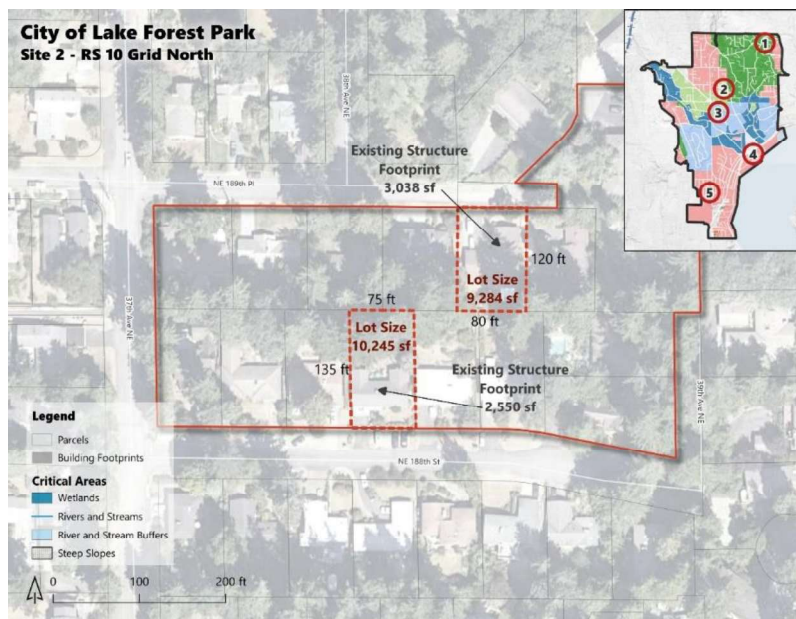


Figure 52. Houses on NE 189th Place



Figure 53. Houses on NE 188th 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.

	9,284 Square Foot Lot	10,245 Square Foot Lot
Infill Opportunities	Internal Conversion	Internal Conversion
Redevelopment Opportunities	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 35th Avenue NE, Ballinger Way NE, 40th Avenue NE, and NE 182nd 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 182nd Street take up 8.8% of the unconstrained land area.

Figure 55. RS 20 Deep Creek

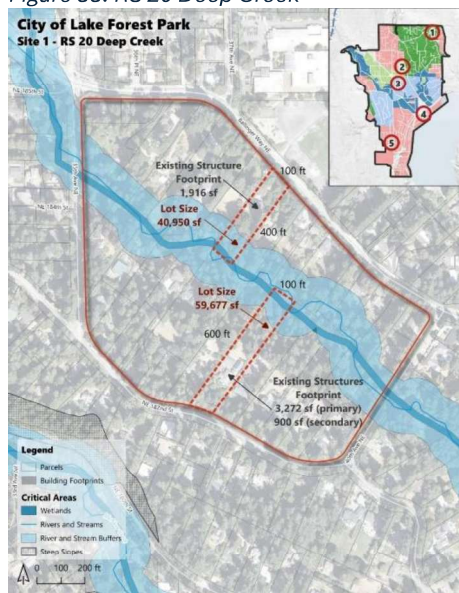


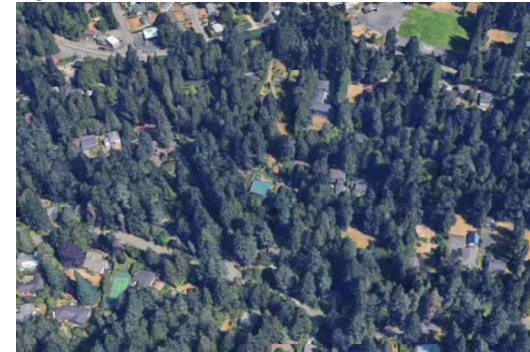
Figure 56. View of Site 3 from Ballinger Way NE



Figure 57. View of Site 3 from NE 182nd 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.

	40,950 Square Foot Lot (28,691 SF unconstrained)	59,677 Square Foot Lot (47,651 SF unconstrained)
Infill Opportunities	ADU Duplex ADU	ADU Duplex ADU
Redevelopment Opportunities	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 171st Street, Shore Drive NE, NE 170th 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

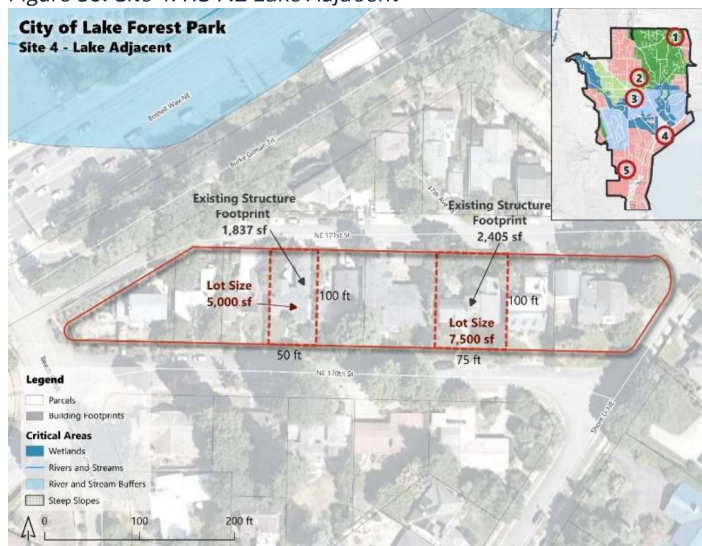


Figure 60. View of Site 4 from NE 170th Street



Figure 61. View of Site 4 from NE 171st 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.

	5,000 Square Foot Lot	7,500 Square Foot Lot
Infill Opportunities	Internal Conversion	Attached ADU Internal Conversion
Redevelopment Opportunities	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 160th Street, 35th Avenue NE, NE 158th Street, and 34th 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

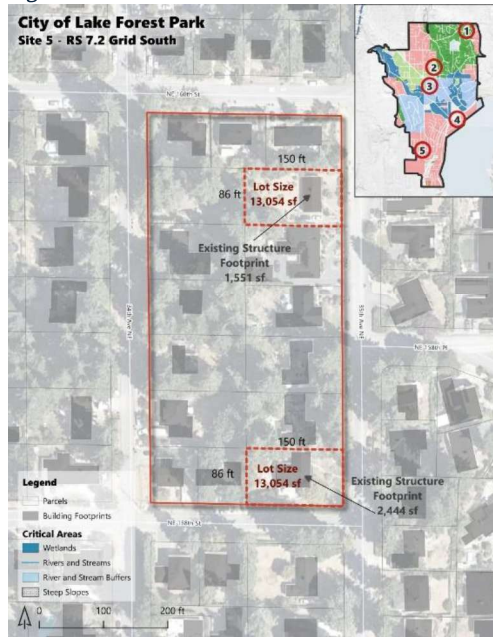


Figure 64. View of Site 5 from 34th Avenue NE



Figure 65. View of Site 5 from 35th 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.

	Northwest Lot	Southeast Lot
Infill Opportunities	Attached ADU Detached ADU	Attached ADU

Redevelopment Opportunities	Duplex (stacked or side-by-side) Tri-plex Fourplex Sixplex Townhouse (up to 3 units) Courtyard Building
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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 limits the feasibility of a wide variety of middle housing types. However, current lot coverage standards are a limiting factor. Raising the allowed lot coverage to 100 percent would significantly increase the feasibility of middle housing up to six units, especially in areas partially constrained by environmental factors.
- Increasing flexibility in zoning regulations to allow a wider variety of housing types than currently permitted by 1110 would help Lake Forest Park meet its goals while reducing the need for tree removal and other impacts in environmentally sensitive areas.
- Lake Forest Park should consider allowing higher density units per lot in targeted areas, such as near transit.
- Building increased flexibility into the code will require decisions regarding density, lot coverage, parking, lot size, and floor area ratio regulations. This decision-making process should align with City goals and priorities with established local, state, and federal and state requirements.
- To promote opportunities for affordable housing, the City should partner with affordable housing providers to understand community needs, establish incentives including density bonuses and/or fee waivers, and revise regulations on fee-simple lot splitting. The City should also explore funding source for affordable housing.

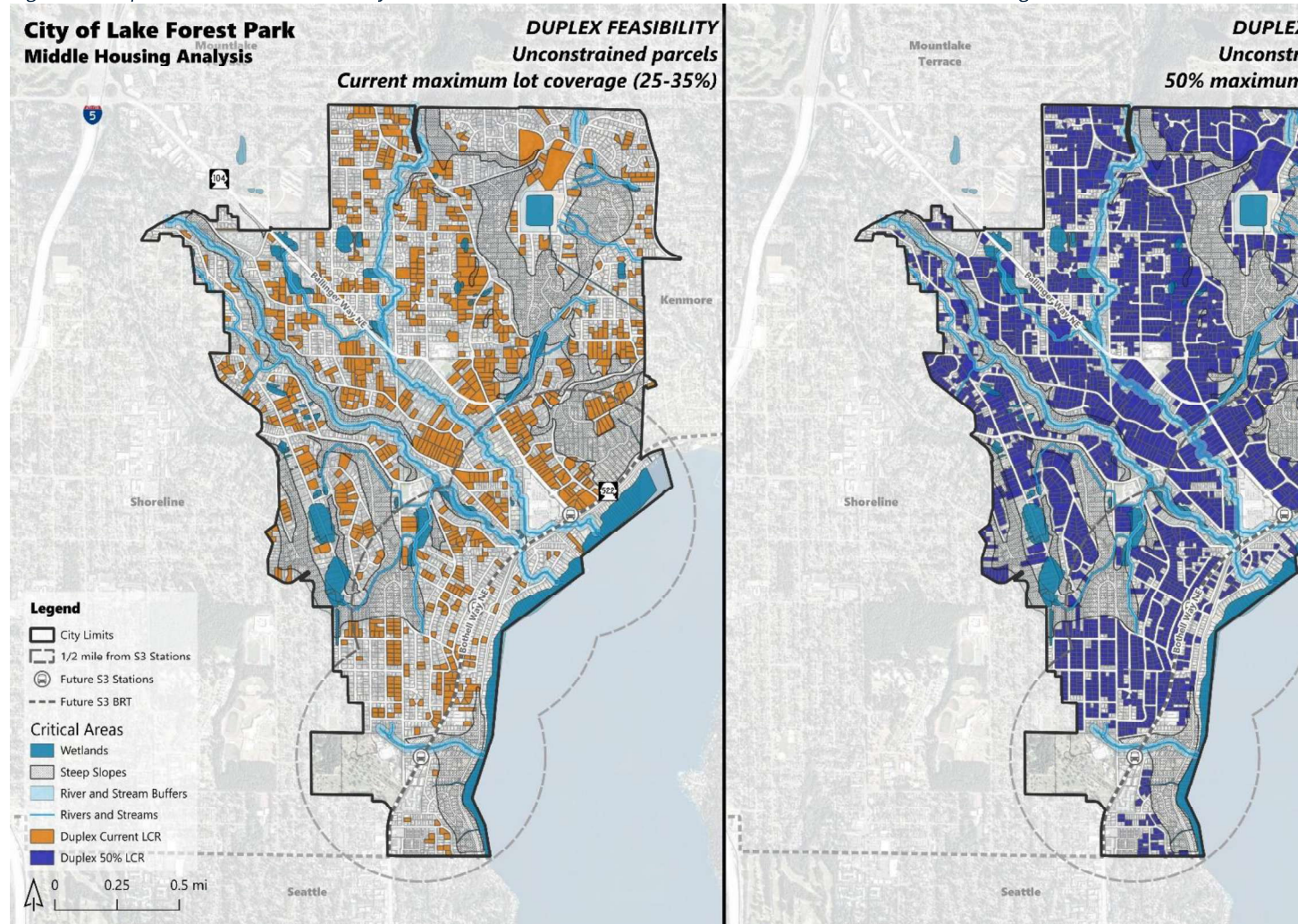
Feasibility by Lot Size

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.

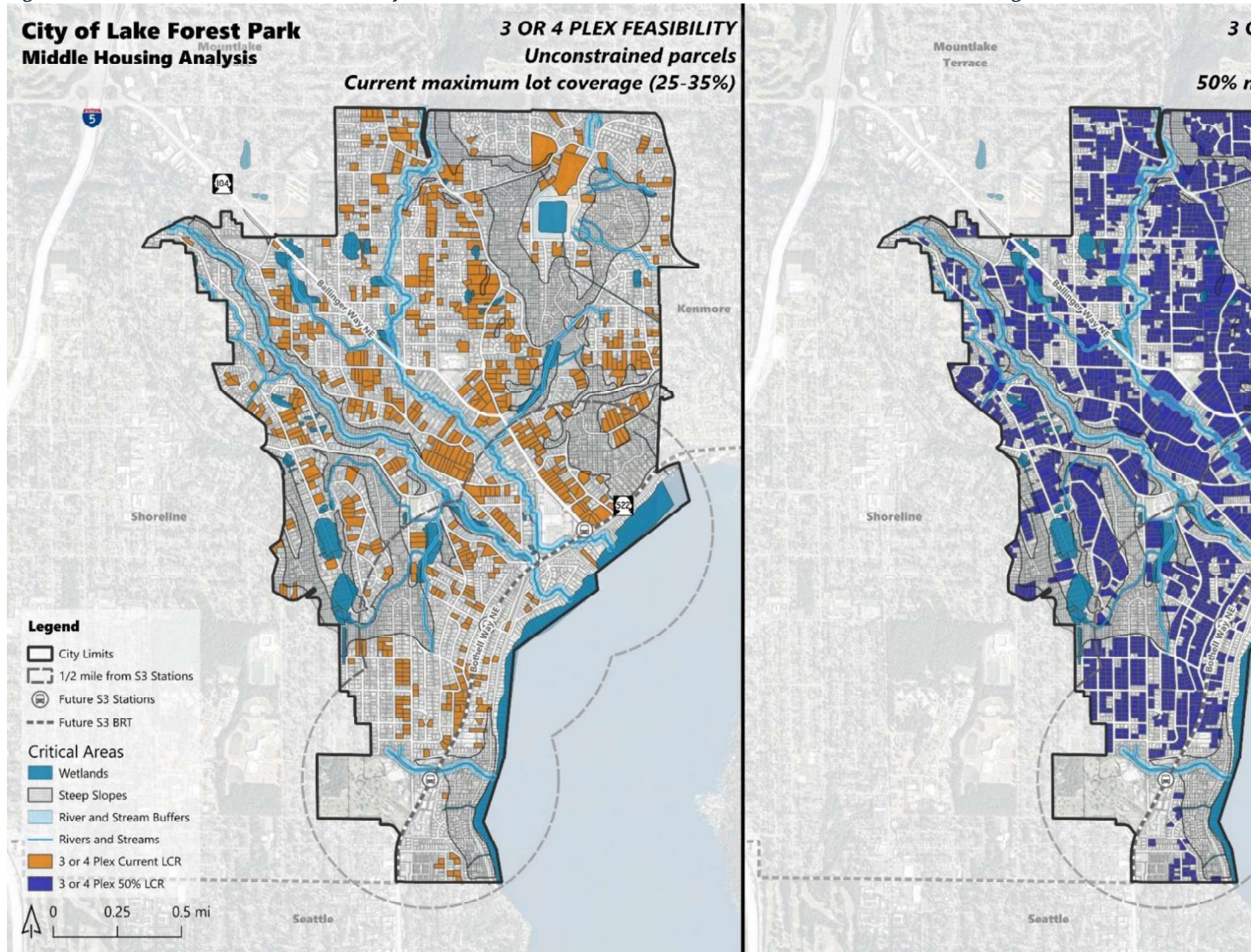
Notably, the capacity for middle housing is significantly increased in areas such as within ½ mile of future BRT service, in the RS-10 area with less existing tree coverage and better access to retail amenities, and in the RS-10 area along the BRT corridor. The capacity significantly increased with the increased allowances. Although the city may not wish to increase the maximum lot coverage to 50 percent in all zones, the analysis suggests that an increased maximum lot coverage in certain lot zones (RS-10, RS-9.6 and particularly RS-9.6) would increase the capacity for duplexes, triplexes, and fourplexes in desirable areas for middle housing. As noted in the previous report, the largest numbers of nonconforming lots are in the 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

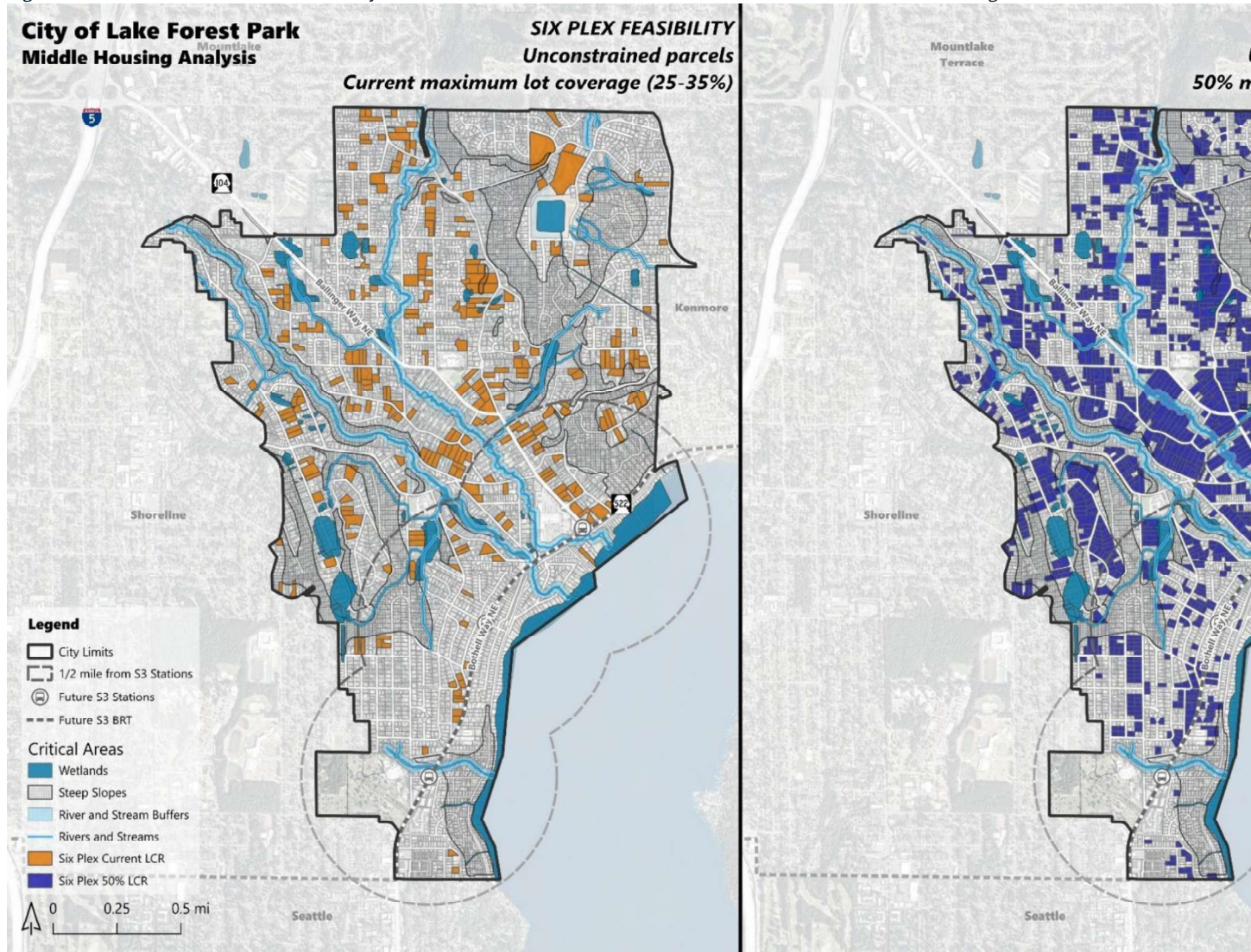
Figure 68. 3 or 4-Plex Dimensional Feasibility in Lake Forest Park with Current and Increased Maximum Lot Coverage



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

Middle Housing Feasibility and Recommendations **DRAFT**

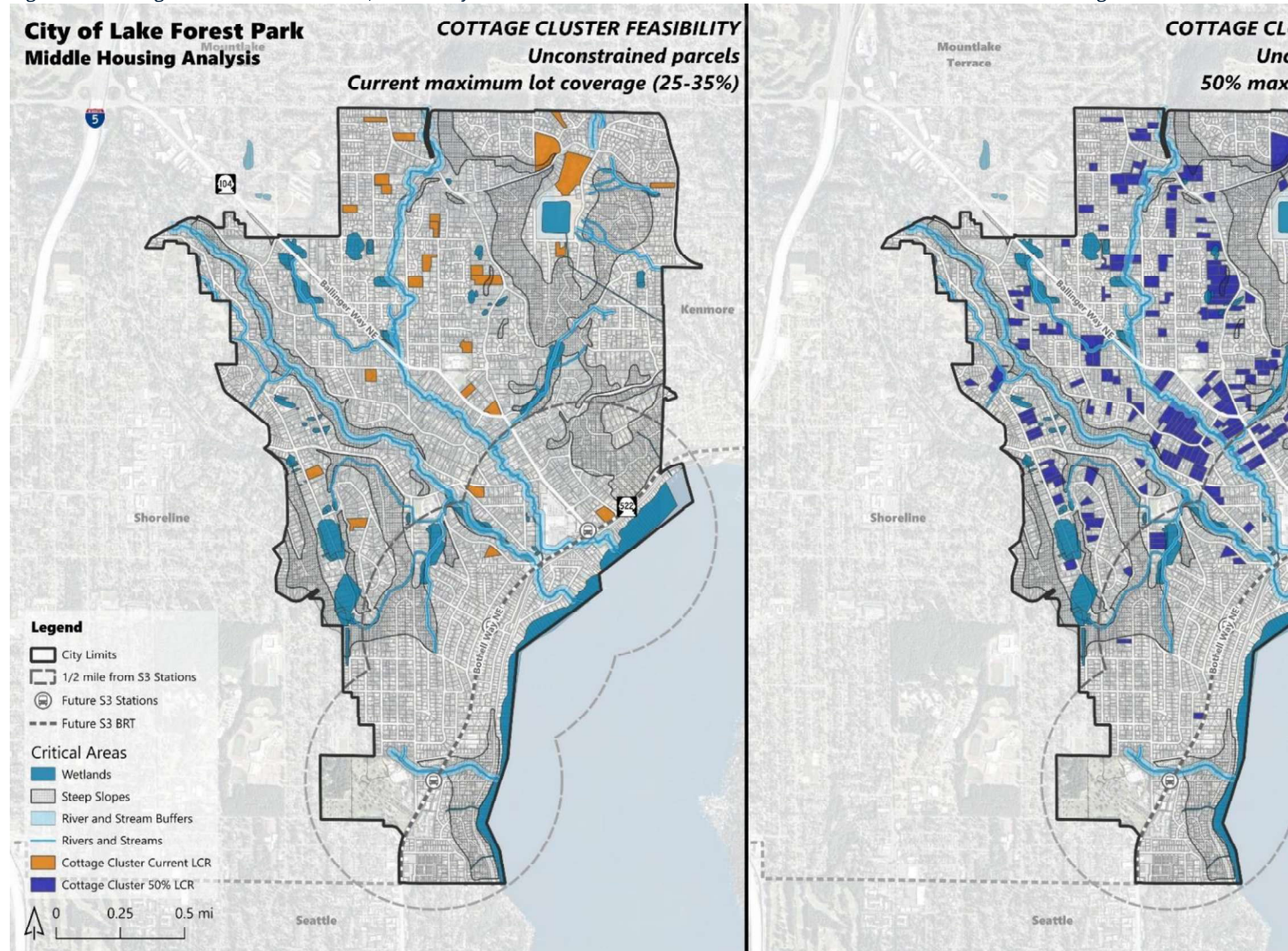
Figure 69. Six-Plex Dimensional Feasibility in Lake Forest Park with Current and Increased Maximum Lot Coverage



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

Middle Housing Feasibility and Recommendations **DRAFT**

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

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Regulatory Considerations

Prioritized Locations for Middle Housing

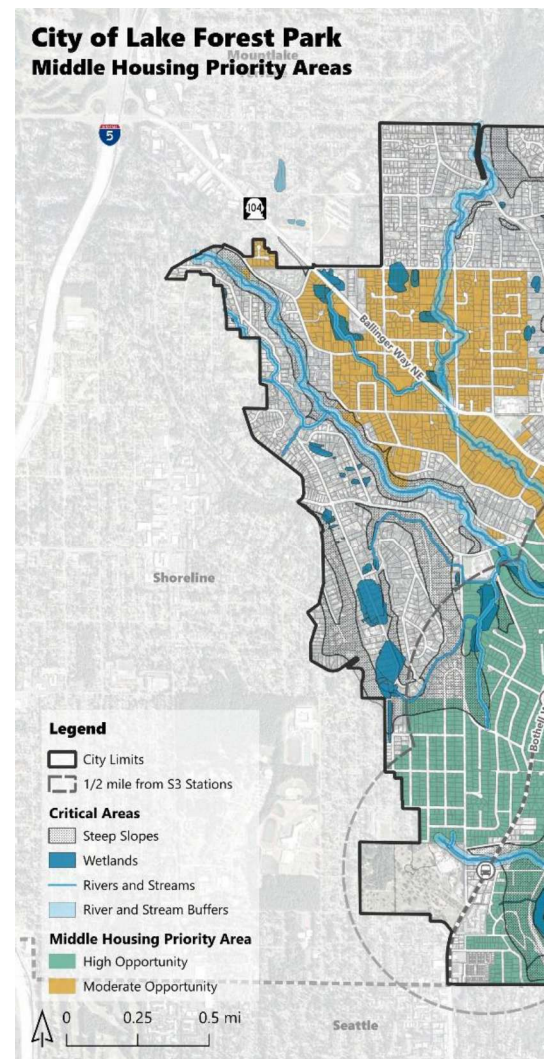
Lake Forest Park is required to allow up to two units on all residential zones. However, there may be some zones or locations within the city where denser middle housing types should be allowed. These include areas that are walkable to transit and retail, as shown in the “Walkability” section of this 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



Source: City of Lake Forest Park, Leland Consulting

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.

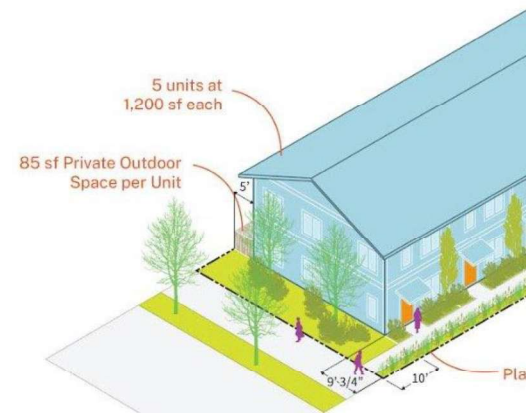
Allowing more units on each lot (or on lots in some zones) could potentially reduce the number of lots that need to be redeveloped to meet new housing demand. Increasing flexibility in the typologies allowed, by permitting cottage clusters, detached ADUs, or courtyard buildings, could also allow developers 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 rule, such as side sixplexes which are essentially townhouses with narrow sideways to fit on more narrow lots. Community preferences can vary, so Lake Forest Park is working with vulnerable communities and development organizations to understand community needs.

Figure 72. Five Townhouses in a “Side-by-Side” Configuration 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	- Allowing four to six units per lot would increase the feasibility of middle housing and increase the affordability of units that are built. - The City could choose to allow more than two units on every residential lot or in certain geographical areas (such as within a half mile of transit).
Redefine Density	Density must be defined by units per lot rather than units per acre or other measures.
Reduce Off-Street Parking Requirements	- The City currently requires 1.5 parking spaces per unit for multifamily dwelling, which could negatively impact the feasibility of middle housing development, especially on lots with environmental issues and/or tree coverage. - Parking requirements could be reduced across all zones or specifically in the zones for more dense middle housing types, such as neighborhoods near transit, and areas with potential for on-street parking. - The number of spaces could also be tied to the number of bedrooms, with lower requirements for smaller studio and one-bedroom units. - Per HB 1337, the City cannot require parking for ADUs within a half mile of transit.
Increase Height Limits	- Lake Forest Park's residential zones allow construction up to 30 feet. While this works 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. - Height limits can vary by zone – if the City chooses to allow more than two units per lot in certain zones, it should ensure that the height limit is not lower than 35 feet in those zones. - Three-story buildings are typically compatible with low-density residential development.
Increase Maximum Lot Coverage	- The current maximum lot coverage in Lake Forest Park's residential zones ranges from 30% to 35%. This is inadequate to accommodate multiple buildings or buildings with larger footprints on site. The Washington model code states that a lot coverage limit for middle housing of 40% is invalid. - Increasing the maximum lot coverage will allow developers greater flexibility to build a variety of homes, particularly on smaller lots that have fewer environmental constraints. - Changing these regulations may require adjustments to setbacks as well.

Create FAR Bonuses for Middle Housing	- To incentivize a wider variety of middle housing types, it is a best practice to create bonuses for each additional unit included. This can vary by zone or target area. - The Washington model code for middle housing in Tier 1 and 2 cities recommends a FAR of 0.6 for a single-family home increasing by 0.2 for each additional unit up to four units. 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.
Preserve the Tree Canopy	- Preservation of the tree canopy is a priority of Lake Forest Park residents. - 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.
Allow Novel Housing Typologies	- Environmental constraints and non-standard lot shapes and sizes will impact the ability to develop a wider variety of housing types in Lake Forest Park. - The City should consider allowing a wider variety of housing types than is currently permitted. The Opticos typology report commissioned by the Department of Commerce. While a useful guide in understanding the typical layouts and dimensions of common housing types, it is not an exhaustive list of all possibilities. Allowing flexibility for cottage, townhome, and detached unit arrangements could allow for these types of developments on lots that do not meet the dimensional standards in the report. - Writing flexibility into the code, especially regarding the orientation and location of building entrances, will be a key component of enabling the construction of new housing types.
Loosen ADU Regulations	- Currently, Lake Forest Park's Municipal Code requires that ADUs cover no more than 15% of the lot area up to a maximum of 1,000 SF. They are only permitted in a rear yard, ten feet from the main buildings. The ADU-specific lot coverage limit will need to be removed due to changes in HB 1337, which prohibit lot coverage limits and setbacks more restrictive than those for the principal structure. - Because many of the residential lots in Lake Forest Park are wooded and include trees that conceal houses from the street, the City should allow ADUs to be built in front yards as well as rear yards. This would reduce impacts to the tree canopy and encourage the construction of new housing on more lots. - Under HB 1337, the City is required to allow at least two ADUs per lot. There are several large 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 multiple small structures placed around a site rather than a single multi-unit structure.

Change Lot Division Standards / Reduce Minimum Lot Sizes	• Current City regulations require 75 feet of street frontage for newly created lots, which means minimum lot sizes smaller than those defined by the existing zones. • Increasing opportunities for lot division can help promote more affordable housing options. • While HB 1245 did not pass the State Senate, it could be a guide for allowing more lot division. This law would have allowed lots created through division to be as small as 25 feet.
Require Accessible or Visitable Units	• The City could choose to require some number or percentage of units within new middle housing development to be accessible or visitable. • Accessible units meet the ADA requirements for housing, while visitable units have a certain number of accessibility features on the ground floor. • The City should consider targeting accessibility and/or visitability regulations to housing types such as fourplexes, sixplexes, and courtyard apartments. • The inclusion of these features would help improve housing access for elderly residents and their families.
Establish Incentives for Affordable Housing	• To achieve its goal of increasing affordable homeownership opportunities, the City could offer density bonuses for the inclusion of affordable units in middle housing developments. • These can include density or height bonuses or a reduction in parking requirements if a certain 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 incentives given local market conditions. • Alternatively, the City could consider waiving some or all fees for middle housing developments that include affordable units. • Similar incentives could also be targeted to accessible housing.

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 contain critical areas (as defined in the bill), an exemption would have an outsized impact on Lake Forest Park due to the large number of 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 of the lots. The report recommends that middle housing be allowed in critical areas regulations as detached single-family housing, in order to “better implement the Comprehensive Element requirements to make adequate provision for existing and projected needs of all segments of the community.”
- The Alternative Compliance Path would allow Lake Forest Park to exempt up to 25 percent of parcels from increased density requirements. However, the report cautions against the Racially Disparate Impact analysis for middle housing in these areas. Because Lake Forest Park had racially restrictive covenants, the report does not recommend that Lake Forest Park use the Alternative Compliance Path.

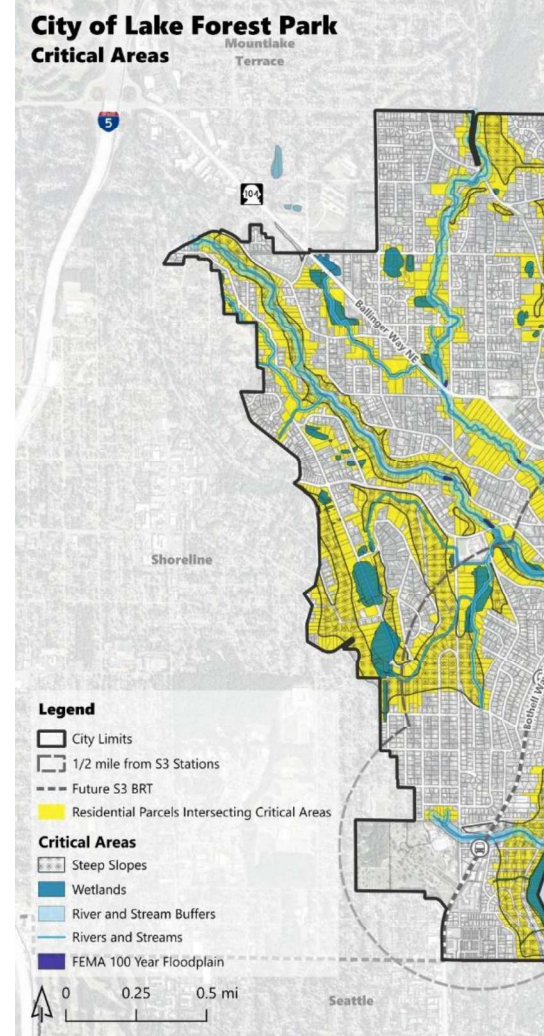
Critical Areas Exemption

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 areas²
- 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, Lelan

² 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.” Commerce recommends that cities do not adopt this exemption code and instead apply existing critical area code requirements to middle housing types in the same way they apply to single-family housing, or use the more nuanced “Alternative Compliance Path,” discussed below.

³ 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.

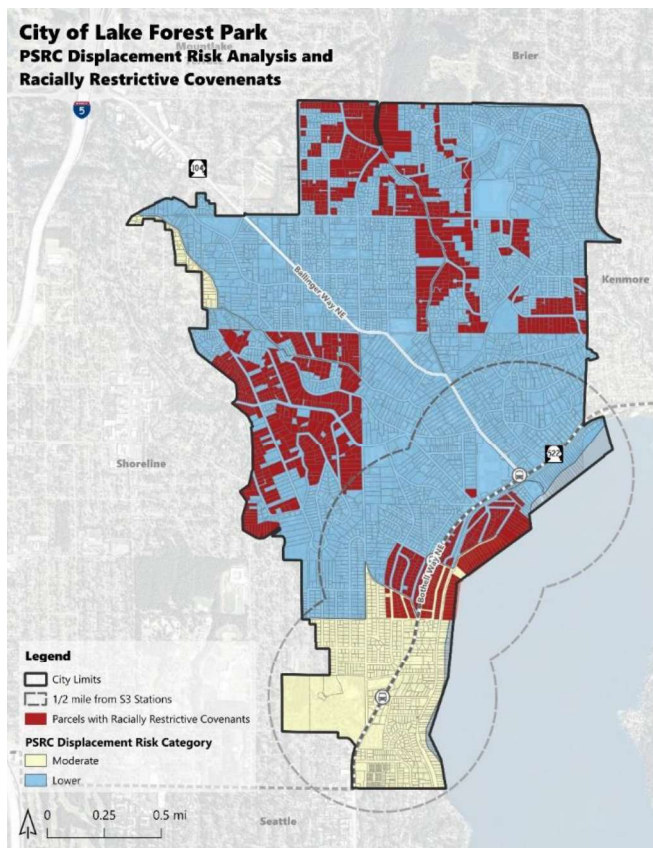
The total universe of parcels which could be exempted due to containing critical areas or their buffers is shown above in Figure 73. As discussed previously, this constitutes 40 percent of

parcels in the city, well above the maximum that could be exempted under this provision.

The restrictions on which parcels can be exempted apply to various areas of Lake Forest Park. The plan area for the Transit line along Bothell Way NE is expected to be within the planning horizon of this Comprehensive Plan. There are 1,754 single-family parcels within the plan area, which is shown with a dashed circle. These parcels would be ineligible for exclusion from 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) is at a moderate risk of displacement, though not currently qualifies as a high-risk area. This may indicate further racially disparate impacts in that area. At least 1,194 known parcels in Lake Forest Park are covered by racially restrictive covenants prohibiting the area from being occupied by non-White residents, according to the [Racial Restrictive Covenants Project](#) at the University of Washington and Eastern Washington University. These areas are shown in red in the map below. Although these covenants are no longer enforced, they are not eligible for exclusion from density requirements of HB 1110 under the Alternative Compliance Path.

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



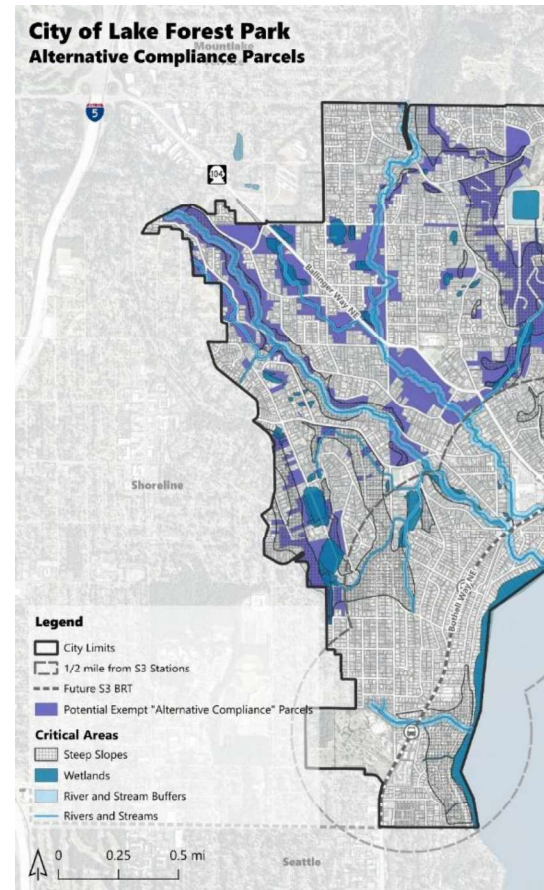
Source: Puget Sound Regional Council, University of Washington Civil Rights and Labor History Consortium, King County, Leland Consulting Group

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

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parcels represents less than 25 percent of Lake Forest Park, the city could potentially exempt all of these parcels under the “Alternative Compliance Path,” or it could exempt some of these parcels where increased density may have 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