

HOUSING & HUMAN SERVICES BACKGROUND REPORT APPENDICES

Appendix A: Land Capacity Analysis Methodology Report

Housing and Human Services Background Report

APPENDIX A

SeaTac 2024 Comprehensive Plan Land Capacity Analysis Methodology and Results Report

Background

As part of SeaTac's 2044 Comprehensive Plan update, Leland Consulting Group (LCG) was retained as part of a consultant team led by Otak to complete an analysis of land capacity for housing and jobs, including considerations of housing by income band as required by HB 1220 (2021), codified in RCW 36.70A.070(2)(c) and adequate provisions for meeting all housing needs as also required by HB 1220 (2021), codified in RCW 36.70A.070(2)(d). This memo outlines the methodology and results of this analysis, using the process outlined in the Washington Department of Commerce's 2023 guidebook "Guidance for Updating Your Housing Element."

Land Capacity Analysis

Housing and Jobs Targets

SeaTac is required to show **land capacity to meet 2044 targets for housing units and jobs** based on the Washington Office of Financial Management countywide projections as allocated to jurisdictions through the Countywide Planning Policies. As outlined in the 2021 King County Countywide Planning Policies, SeaTac must show capacity to accommodate **5,900 new Housing Units** and **14,810 new jobs** between 2019 and 2044.

The housing unit targets are further broken down by what income band the housing units can serve, expressed as a percentage of the HUD Area Median Income (AMI). The AMI is determined by the U.S. Department of Housing and Urban Development (HUD), and is generally higher than the Census-reported Median Household Income for a given city, since it is a countywide metric. It is based on Census-reported family income, which includes families of related persons, excluding one-person households. Therefore, the AMI is inherently adjusted for the various family sizes of the Census respondents.

The table below shows the AMI for King County at various levels.

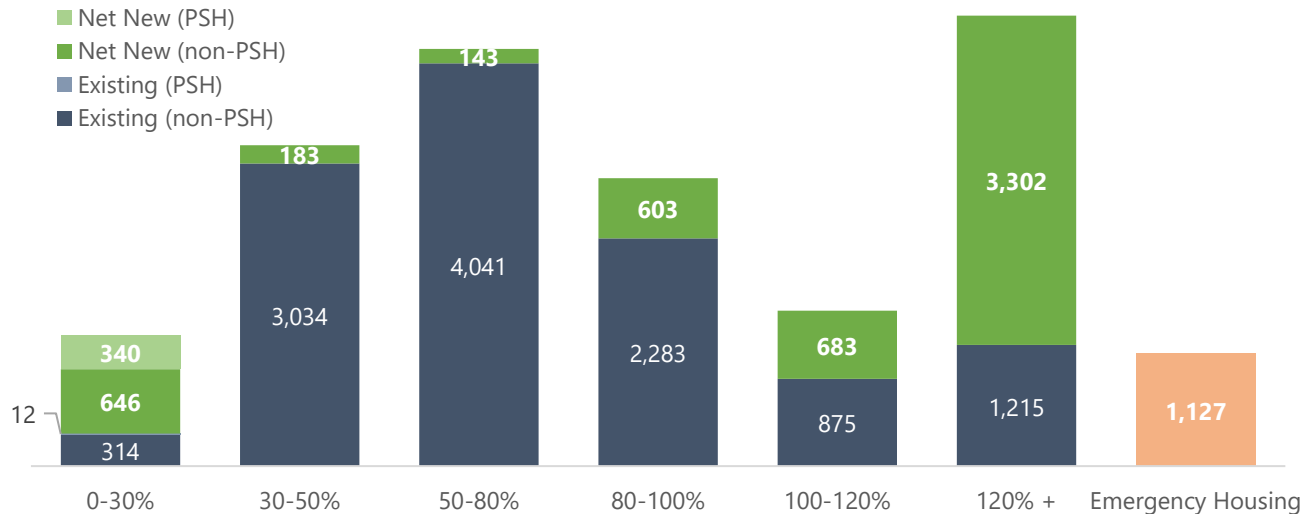
Figure 1. King County AMI at Various Income Levels

30%	50%	80%	100%	120%
\$43,950	\$73,250	\$117,200	\$146,500	\$175,800

Source: HUD

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

Figure 2. SeaTac Existing and Target Housing Units by Income Band, 2019-2044



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

Vacant and Redevelopable Parcels and Pending Development

The first step in the land capacity analysis is to determine which parcels could accommodate new development over the 20-year planning horizon. The City provided GIS data from their most recent Land Capacity Analysis classifying parcels in SeaTac as **vacant, redevelopable** (based on low building to land value ratio and other considerations), or **constant** (not likely to change over the next 20 years). Working with city staff, LCG updated the set of vacant and redevelopable parcels to account for new development which has taken place since the Buildable Lands assessment as well as planned and proposed development. Additionally, environmentally constrained acreage was provided in the City's parcel data. This acreage was excluded from the total parcel acreage of vacant and redevelopable parcels. The total parcel acreage by zone classified as vacant and redevelopable, as well as critical area acreage by zone, is shown below in Figure 3.

Figure 3. Gross Acreage and Critical Area Acreage by Zone for SeaTac LCA

Zone	Vacant			Redevelopable		
	Gross Acres	Critical Area Acres	Unconstrained Gross Acres	Gross Acres	Critical Area Acres	Unconstrained Gross Acres
UL-15,000	11.6	1.5	10.1	35.2	1.8	33.4
UL-9,600	0.6	0.0	0.6	8.7	0.0	8.7
UL-7,200	197.0	86.9	110.1	412.2	5.0	407.3
T	0.3	0.0	0.3	6.0	0.0	6.0
UM-3,600	0.5	0.0	0.5	0.3	0.0	0.3
UM-2,400	3.6	0.0	3.6	18.2	0.0	18.2
MHP	13.6	0.1	13.5	0.0	0.0	0.0
UH-1,800	3.2	0.6	2.6	8.9	0.0	8.9
UH-900	52.6	8.5	44.1	70.7	7.9	62.7
UH-UCR	0.6	0.0	0.6	6.9	0.0	6.9
NB	1.2	0.0	1.2	2.1	0.0	2.1
O/C/MU	2.8	0.0	2.8	0.4	0.0	0.4
OCM	0.0	0.0	0.0	7.0	0.0	7.0
CB	5.5	0.3	5.3	17.3	0.0	17.3
CB-C	8.3	0.0	8.3	103.6	1.7	102.0
RBX	13.8	1.6	12.2	36.2	0.9	35.3
I	17.4	6.3	11.1	38.4	9.5	28.9
AVC	199.7	32.2	167.5	0.2	0.0	0.2
AVO	0.0	0.0	0.0	0.0	0.0	0.0
P	0.0	0.0	0.0	0.0	0.0	0.0
HDS-OZ	0.0	0.0	0.0	10.2	2.2	8.0

Source: City of SeaTac, Leland Consulting Group

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Next, development which has occurred since 2019 or is planned, proposed, or under construction was totaled. These new housing units and jobs **count towards the growth targets**, since the baseline established by King County was for 2019. This **recent and forthcoming development totals 2,235 housing units and 477 jobs**. Details of pending jobs and housing units are shown below in Figure 4.

Figure 4. Pending Development (since 2019 and proposed/under construction) in SeaTac for LCA

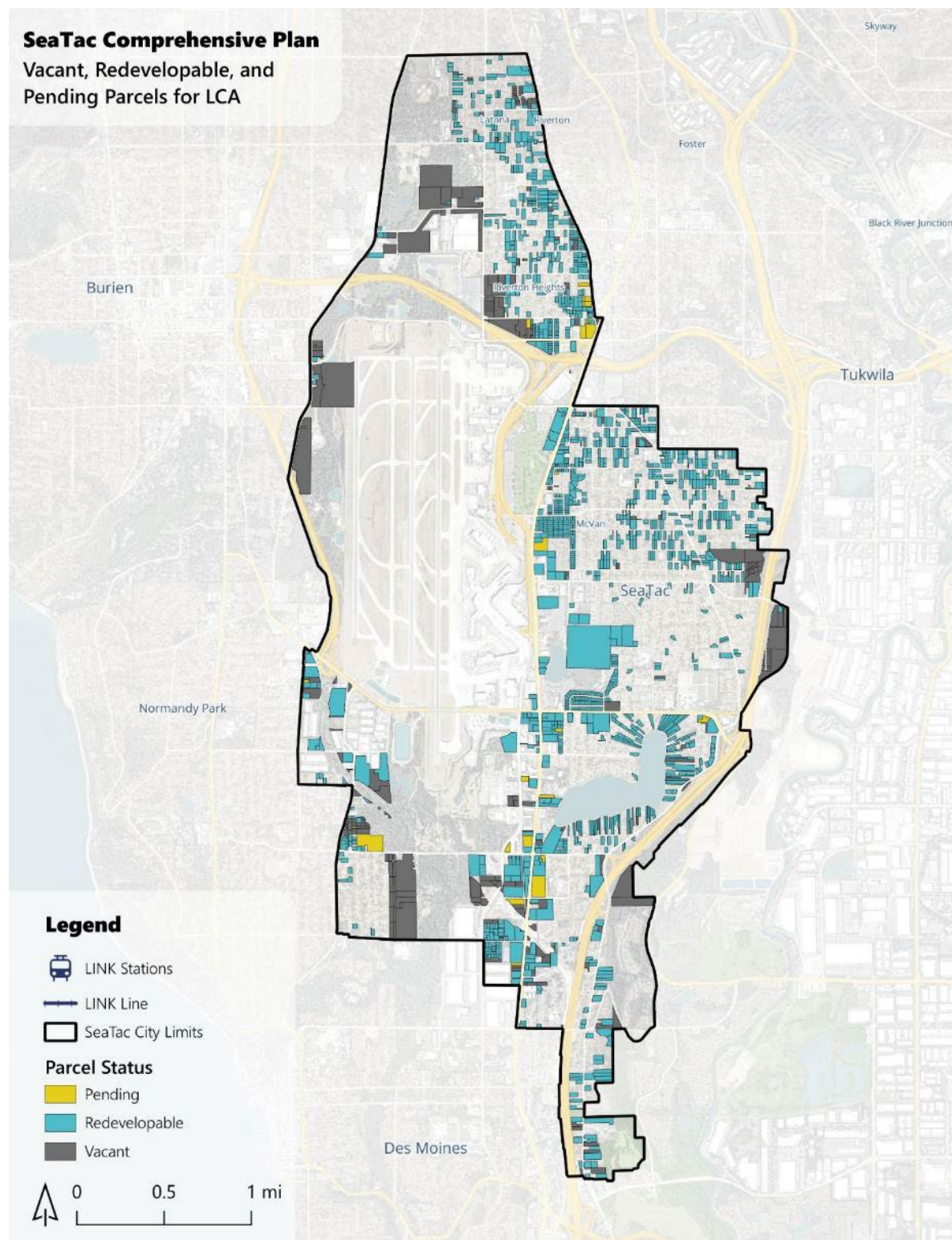
Project Name/Notes	Zone	Project Type	Acres	Townhomes	Mutifamily Units	Jobs
Polaris Apartments @SeaTac	CB-C	Mixed Use	2.9	0	365	31
Adara Apartments @ SeaTac	CB-C	Mixed Use	1.4	0	220	14
Amelia Apts	CB-C	Multifamily	0.5	0	108	0
Angle Lake Apts/Mercy HousingMixed Use	RBX	Mixed Use	0.8	0	130	18
Time (GMC) APARTMENTSMixed Use	CB-C	Mixed Use	2.1	0	289	3
SEATAC AIRPORT HOTEL AND APARTMENTSMixed Use	CB-C	Mixed Use	2.9	0	182	0
Cymbaluk DevelopmentMixed Use	I	Mixed Use	6.2	0	741	12
Mayer Court Apartments	CB-C	Multifamily	1.8	0	117	17
Angle Lake Apartments	UH-900	Multifamily	0.9	0	56	0
Victoria Townhomes	T	Townhomes	0.8	9	0	0
Sibo Apartments	UM-2,400	Multifamily	0.2	0	5	0
Tarmac Heights Apartments	UH-900	Multifamily	0.2	0	13	0
Candelwood Suites Hotel	UH-900	Hotel	0.9	0	0	27
Jiffy Park Expansion	CB-C	Parking	2.3	0	0	10
International Boulevard Site Development	CB-C	Retail	1.8	0	0	52
Bridge Point SeaTac 300	I	Industrial	9.1	0	0	207
Secure Space Self-Storage	RBX	Storage	1.8	0	0	8
Home 2 Suites	CB-C	Hotel	0.7	0	0	22
Avid Hotel	CB-C	Hotel	1.1	0	0	34
Park-N-Jet Expansion	RBX	Parking	4.8	0	0	21
Total				9	2,226	477

Source: City of SeaTac, Leland Consulting Group

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The map below shows the locations of parcels classified as vacant (in grey), redevelopable (in blue), and parcels with pending units or jobs constructed since 2019, planned, or under construction (in yellow).

Figure 5. Vacant and Redevelopable Parcels and Recent/Pending Development in SeaTac, 2023



Source: City of SeaTac, MapTiler, CoStar, King County, Leland Consulting Group

Reduction Factor

Commerce's HB 1220 guidance indicates that jurisdictions should reduce the amount of vacant and redevelopable acreage by a reasonable amount to account for land which may not be available for redevelopment due to the need for new **right-of-way, public space, stormwater facilities, or other dedications**, as well as a reasonable estimate of the amount of land that will remain unavailable due to the **market**. The Department of Commerce suggests a minimum reduction of 15% for vacant parcels and 25% for redevelopable parcels. Using this as a baseline, LCG conducted additional analysis on reduction factors based on the recommended methodologies outlined in the Department of Commerce's 2018 "Review and Evaluation Program Buildable Lands Guidelines." LCG analyzed market factor in three ways as follows:

- **Zone Trends Method A:** This analysis considered how much land in each zone was redeveloped over the past five years compared with the amount of *currently vacant and redevelopable land* in the zone. The acreage redeveloped over the past five years was multiplied by four to extrapolate a continuation of recent trends in that zone over the next 20 years. A reduction factor was then calculated based on the share of total vacant and redevelopable land in the zone that would redevelop assuming a continuation of recent trends.
- **Zone Trends Method B:** This analysis considered how much land in each zone was redeveloped over the past five years compared with *total land* in the zone. The acreage redeveloped over the past five years was multiplied by four, as above, to extrapolate recent trends extending out over a 20 year horizon. A reduction factor was then calculated based on the share of total zone acreage represented by a continuation of recent trends.
- **Improvement Value Method:** This method calculated a reduction factor based on improvement (building) value as a share of total parcel value in each zone. This analysis essentially assigns a higher rate of future development to zones with lower-value buildings when compared to land value.

The overall trends seen by each method were similar, although the two "Zone Trends" methods resulted in numerous zones with 100 percent reduction factors, since there had not been recent development in those zones. The "Improvement Value Method" was more nuanced but did not necessarily reflect trends of more intensive development in the Urban Center as accurately. Therefore, the results of all three methods were **averaged** for each zone to determine the final reduction factor. Finally, the reduction factor for **vacant parcels** was reduced by 10 percent, following the baseline Commerce guidance showing that vacant parcels are more likely to redevelop than those classified "redevelopable." The total unconstrained gross acres by zone were reduced by these final reduction factors to arrive at the net developable acreage in each zone, as shown below.

Figure 6. Deduction Factors and Total Vacant and Redevelopable Acreage for SeaTac LCA

Zone	Vacant Unconstrained Gross Acres	Vacant Deduction Factor	Net Vacant Acres	Redevelopable Unconstrained Gross Acres	Redevelopable Deduction Factor	Net Redevelopable Acres	Total Net Acres
UL-15,000	10.1	79%	2.1	33.4	88%	4.0	6.0
UL-9,600	0.6	79%	0.1	8.7	88%	1.0	1.1
UL-7,200	110.1	78%	24.4	407.3	86%	55.1	79.7
T	0.3	51%	0.1	6.0	56%	2.6	2.7
UM-3,600	0.5	87%	0.1	0.3	97%	0.0	0.1
UM-2,400	3.6	83%	0.6	18.2	92%	1.4	2.0
MHP	13.5	60%	5.4	0.0	67%	0.0	5.4
UH-1,800	2.6	83%	0.4	8.9	92%	0.7	1.2
UH-900	44.1	78%	9.7	62.7	87%	8.3	20.7
UH-UCR	0.6	22%	0.5	6.9	25%	5.2	5.7
NB	1.2	74%	0.3	2.1	82%	0.4	0.7
O/C/MU	2.8	63%	1.0	0.4	70%	0.1	1.2
OCM	0.0	65%	0.0	7.0	72%	1.9	1.9
CB	5.3	71%	1.5	17.3	79%	3.7	5.6
CB-C	8.3	53%	3.9	102.0	59%	41.4	51.4
RBX	12.2	51%	6.0	35.3	57%	15.3	21.2
I	11.1	39%	6.8	28.9	43%	16.5	24.6
AVC	167.5	75%	41.7	0.2	83%	0.0	41.8
AVO	0.0	75%	0.0	0.0	84%	0.0	5.7
P	0.0	75%	0.0	0.0	84%	0.0	0.0
HDS-OZ	0.0	83%	0.0	8.0	92%	0.6	0.6

Source: City of SeaTac GIS and Permit Data, WA Department of Commerce, CoStar, King County Assessor, Leland Consulting Group

Housing and Job Density Assumptions

Having established the amount of available developable acreage, the next step in the analysis was to determine the share of this acreage which may redevelop as residential and nonresidential uses in each zone. This was based on recent and permitted development trends as well as input from SeaTac staff. Figure 8 below shows the percentage of net acreage in each zone assumed to redevelop as residential uses, with the remaining assumed to redevelop as commercial uses.

The next step was to estimate the density at which the residential acreage could redevelop. Following Commerce guidance, low- and moderate- zones are assumed to redevelop at the **maximum allowed density in the zoning code**. This was calculated based on minimum lot size in each zone. (Note that additional capacity for middle housing and ADUs in low-density zones will be addressed at the parcel level later in this report.) Housing unit density assumptions for multifamily zones are based on the **density of recent development** over the past five years in those zones or adjacent zones with similar density allowances. The density assumptions for each zone that allows housing are shown below in Figure 7. These densities were applied to the net vacant and redevelopable acreage shown above in Figure 6 to determine housing unit capacity in each zone.

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Figure 8. Share of Acreage Expected to Redevelop as Residential Uses by Zone in SeaTac

Zone	% Residential
UL-15,000	100%
UL-9,600	100%
UL-7,200	100%
T	100%
UM-3,600	100%
UM-2,400	100%
MHP	100%
UH-1,800	100%
UH-900	100%
UH-UCR	50%
NB	25%
O/C/MU	25%
OCM	25%
CB	70%
CB-C	70%
RBX	50%
I	30%
AVC	0%
AVO	0%
P	0%
HDS-OZ	100%

Source: City of SeaTac, CoStar, Leland Consulting Group

Figure 7. Housing Density Assumptions for SeaTac LCA

Zone	Assumed Density for LCA (du/ac)
UL-15,000	2.9
UL-9,600	4.5
UL-7,200	6.1
T	24.0
UM-3,600	12.1
UM-2,400	18.2
UH-1,800	24.2
UH-900	61
UH-UCR	24.0
NB	55.0
O/C/MU	55.0
OCM	55.0
CB	121.0
CB-C	121.0
HDS-OZ	8.7

Source: City of SeaTac, CoStar, Leland Consulting Group

Employment density was calculated in two steps. Some recent developments in the city have seen ground floor commercial spaces in residential buildings, and this trend is expected to continue. In order to quantify the potential for employment in mixed-use residential buildings, a number of regional developments in the Puget Sound area with ground floor commercial space were analyzed to determine an average job density of **10 jobs per acre** in this type of development. This job density was then applied to 25-50 percent of the expected acreage of mixed-use development in the UH-900, UH-UCR, NB, O/C/MU, OCM, CB, CB-C, and RBX zones from the previous step, based on staff expectations and zoning code requirements for ground floor commercial. This generated a total capacity of **67 jobs** in mixed-use buildings.

To estimate employment capacity on the expected nonresidential vacant and redevelopable acreage, **FAR** for regional prototypes for office, health care, hotel, industrial, and neighborhood-scale retail buildings were analyzed and then converted into **jobs per acre** using employment density assumptions from the 2021 King County Urban Growth Capacity Report. Job density assumptions are shown below. These prototypes and densities were then applied to the nonresidential available acreage by zone in various shares corresponding to potential future development patterns to determine potential employment capacity.

Figure 9. Prototype Job Density Assumptions Used in SeaTac LCA

Office Jobs/Acre	Hotel Jobs/Acre	Industrial Jobs/Acre	Neighborhood Retail Jobs/Acre
659	30	8	67

Source: CoStar, Urban Footprint, Leland Consulting Group

Additional Airport Jobs

The Seattle-Tacoma International Airport was considered separately for this analysis. Based on a study conducted for the Port of Seattle's Sustainable Airport Master Plan¹ a recent study quantifying the potential impacts of proposed terminal expansions, the potential for 4,900 additional jobs by 2044 was applied to the airport parcel and added to the jobs capacity totals.

Additional ADU and Middle Housing Capacity

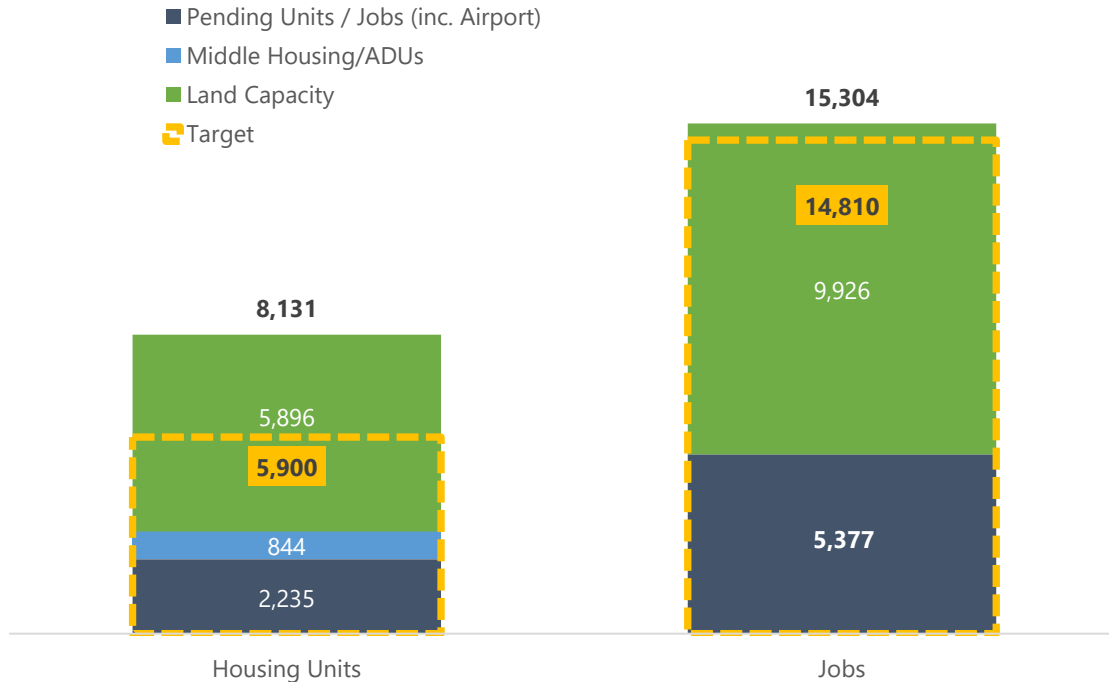
HB 1337 and HB 1110, passed in 2023, require that Washington cities allow for increased ADUs and middle housing types, respectively, on lots zoned for single-family development. SeaTac is obligated to allow at least two units per lot citywide and four units per lot near frequent transit under HB 1337, and the City is also required to allow two ADUs, detached or attached in any configuration, on all lots under HB 1110. Based on Commerce guidance and recent trends, the City assumed that up to 10 percent of landowners may choose to construct an ADU and up to 5 percent may choose to construct middle housing (i.e. duplexes). Therefore, the total number of parcels in single-family zones was multiplied by 15 percent to arrive at a potential **additional capacity of 844 additional units** of housing over 20 years from ADUs and middle housing types.

Overall Results

Figure 10 below shows the results of the housing and jobs capacity analysis. Pending units or jobs developed since the baseline and/or permitted but not yet constructed are shown in dark blue, ADU and Middle Housing capacity is shown in light blue, and additional zoned capacity for housing and jobs calculated as detailed above is shown in green. Overall, **SeaTac has sufficient capacity to meet and exceed both housing and jobs targets**. Although recent development has been somewhat weighted towards housing, given market demand, SeaTac does have adequate zoned capacity to meet the employment targets, particularly as markets shift in the coming decades and the city takes steps to encourage more job growth. As a result of new state legislation passed in 2021, the city must also break down the total housing capacity by the potential income bands served, detailed in the following section of this report.

¹ Source: SEA Sustainable Airport Master Plan, Technical Memo #5. Page 1-17, Table 1-2.
<https://www.portseattle.org/sites/default/files/2018-05/TM-No-05-Facility-Requirements.pdf>

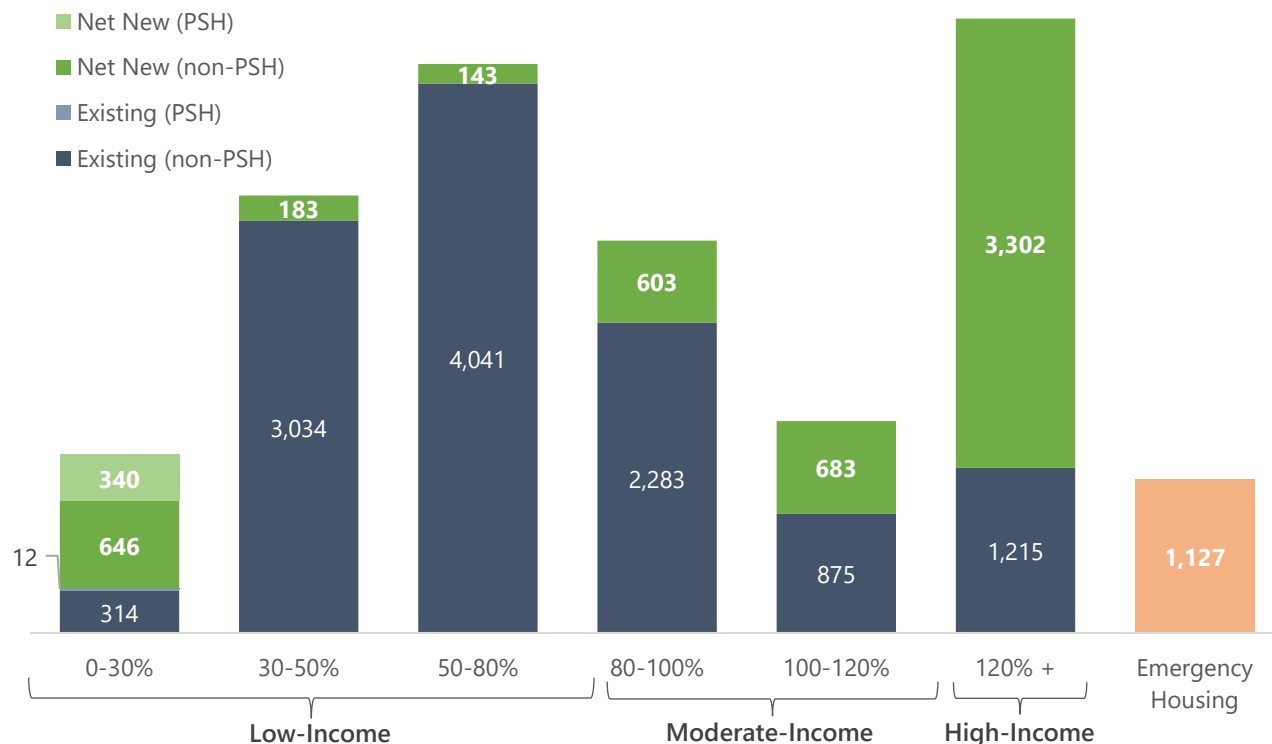
Figure 10. SeaTac Net New Housing Unit and Jobs Targets and Results, 2019-2044



Housing Needs by Income Band

HB 1220 requires jurisdictions to analyze their housing capacity by what household income level the new units can serve. Each county establishes income-based targets for each city within the county, and the cities must then demonstrate that they have sufficient land capacity for the number of units allocated in each income band, as well as capacity for emergency housing units. SeaTac's existing and target housing units for the 2019-2044 period are shown below in Figure 11.

Figure 11. SeaTac Existing and Target Housing Units by Income Band, 2019-2044



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

Pending Units by Income Band

The first step in this analysis is to break down the units which have been built since 2019, are proposed, or are under construction by the income level that they will serve. LCG analyzed existing average rents by zone and by unit size based on data from CoStar. Average ownership housing prices for single-family homes and condos from Zillow were also analyzed. These rents and housing prices were then compared to the HUD Area Median Income (AMI) for the appropriate household size to determine what income levels (as a percentage of the AMI) could afford to rent or purchase housing in SeaTac without being cost-burdened (defined as spending more than 30 percent of household income on housing costs). The table below shows the breakdown of recent and planned units by income bracket and zone based on this analysis. Note that the relatively large amount of low-income pending units are likely due to local housing market conditions and lower average rents in SeaTac compared with King County as a whole. This is also likely related to the City's relatively low household incomes when compared with the Countywide AMI.

Income Categories

This analysis uses three main income categories:

Low-Income (Households earning under 80% AMI)

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

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

Figure 12. Breakdown of Pending (Recent and Planned) Units by Income Band

AMI	Pending Units
0-30%	0
30-50%	0
50-80%	1,966
80-100%	260
100-120%	9
120% +	0

Source: City of SeaTac, CoStar, Leland Consulting Group

Land Capacity by Income Band

The next step in this analysis is to break down the land capacity for future units into income bands that those units could serve. Following Department of Commerce guidance, this is accomplished by grouping zones into **zone categories** based on the housing types that are allowed, and associating those zone categories with potential income levels that can be served by development in those zones, as shown below in .

Figure 13. Commerce Guidance on Income Levels Served by Zone Categories

Zone category	Typical housing types allowed	Lowest potential income level served		Assumed affordability level for capacity analysis
		Market rate	With subsidies and/or incentives	
Low Density	Detached single family homes	Higher income (>120% AMI)	Not typically feasible at scale*	Higher income (>120% AMI)
Moderate Density	Townhomes, duplex, triplex, quadplex	Moderate income (>80-120% AMI)	Not typically feasible at scale*	Moderate income (>80-120% AMI)
Low-Rise Multifamily	Walk-up apartments, condominiums (2-3-floors)	Low income (>50-80% AMI)	Extremely low and Very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
Mid-Rise Multifamily	Apartments, condominiums	Low income (>50-80% AMI)	Extremely low and Very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
ADUs (all zones)	Accessory Dwelling Units on developed residential lots	Low income (>50-80% AMI)	N/A	Low income (>50-80% AMI) – Group with Low-Rise and/or Mid-Rise Multifamily

Source: WA Department of Commerce, "Guidance for Updating Your Housing Element" (August 2023)

SeaTac's current zoning classifications and associated housing types are shown below, along with the net unit capacity by zone. Note that the UH-1,800 and UH-900 zones both allow and contain a wide variety of housing types corresponding to both the Moderate Density and Low-Rise classifications. Therefore, the capacity in these zones was split between these two zone categories:

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Figure 14. Zone Categories and Housing Types in SeaTac

Zone	Zone	HB 1220 Zone Category	Housing Types	Net Unit Capacity
Urban Low Density 15,000	UL-15,000			14
Urban Low Density 9,600	UL-9,600	Low Density	Detached single-family homes	3
Urban Low Density 7,200	UL-7,200			367
High Density Single-Family Overlay Zone	HDS-OZ			56
Townhouse	T	Moderate Density	Townhomes, duplex, triplex, quadplex	1
Urban Medium Density 3,600	UM-3,600			32
Urban Medium Density 2,400	UM-2,400			0
Urban High Density 1,800 (half)	UH-1,800	Moderate Density & Low-Rise (1/2	Townhomes, duplex, triplex, quadplex, walk-up apartments, condominiums (2-3 stories)	16
Urban High Density 900 (half)	UH-900			1,096
Urban High - Urban Center Residential	UH-UCR	Mid-Rise	Apartments, condominiums	53
Neighborhood Business	NB			9
Office/Commercial/Mixed-Use	O/C/MU			15
Office/Commercial Medium	OCM			27
Community Business	CB			440
Community Business in the Urban Center	CB-C			3,761

Source: Washington Department of Commerce, Leland Consulting Group

Following this classification, the zone categories are then **aggregated and assigned to affordability levels** based on Commerce guidance and the previously discussed rent and housing price analysis conducted by LCG. The previously discussed additional parcel-level ADU and Middle Housing capacity is added at this step and assigned to the moderate-income (80-120% AMI) category. The aggregated capacity by zone category is shown below:

Figure 15. Affordability Levels by Aggregated Zone Category in SeaTac

HB 1220 Zone Category	Housing Types Allowed	Additional Unit Capacity	Assumed Affordability Level for Capacity Analysis
Low Density	Detached single-family homes	390	120% +
Moderate Density	Townhomes, duplex, triplex, quadplex	645	80-120%
Low-Rise	Walk-up apartments, condominiums	556	0-80%
Mid-Rise	Apartments, condominiums	4,305	0-80%
ADU + MH	Accessory Dwelling Units, duplexes	844	80-120%

Source: Washington Department of Commerce, Leland Consulting Group

Finally, the housing targets by income band are compared with the above capacity breakdown by income band. In addition, pending units which were previously distributed by income band as shown above in Figure 12 are added in at this point to account for development which has occurred since 2019 and/or is permitted, planned, or under construction. The results are shown below in Figure 16.

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Figure 16. SeaTac Housing Targets and Capacity by Income Band

Income Band	Housing Needs	Pending Units	Remaining Needs	Aggregated Remaining Needs	Total Capacity	Surplus/ Deficit
0-30 PSH	340	0	340			
0-30 Non PSH	646	0	646			
30-50	183	0	183	-654	4,861	5,515
50-80	143	1,966	-1,823			
80-100	603	260	343	1,017	1,489	472
100-120	683	9	674			
120+	3,302	0	3,302	3,302	390	(2,912)
Total	5,900	2,235	3,665	3,665	6,740	3,075

Source: Washington Department of Commerce, Leland Consulting Group

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

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

Land Capacity for Emergency Housing

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

SeaTac Municipal Code Chapter 15.105.050 defines "Emergency housing" as *"temporary indoor accommodations for individuals or families who are homeless or at imminent risk of becoming homeless that are intended to address the basic health, food, clothing, and personal hygiene needs of individuals or families. Emergency housing may or may not require occupants to enter into a lease or an occupancy agreement."* "Emergency shelter" is defined as *"an indoor facility that provides a temporary shelter for individuals or families who are currently homeless. Emergency shelters may not require occupants to enter into a lease or an occupancy agreement. Emergency shelter facilities may include day cooling and warming centers that do not provide overnight accommodations."*

As part of this Comprehensive Plan update, the City is adopting a wide range of changes to its zoning code, including changes to zoning designations and use tables. **This analysis of Emergency Housing land capacity is based on the proposed zoning changes which the City plans to adopt along with the 2024 Comprehensive Plan update.** Under these proposed changes, Emergency Housing and Emergency Shelter will be allowed as permitted uses in the RL, RM, URM, MHP, RH, URH, URH-MU, NVM, UVM, UVH, CB, CB-C and RBX zones. The table at right shows the existing zoning designations in SeaTac and the corresponding new zoning designations after the proposed changes will take effect. This analysis considered parcels which were classified as "Vacant" or "Redevelopable" in the overall land capacity analysis detailed above which were located in the proposed zones in which emergency housing will be allowed, based on conversion of existing zoning to new zoning as shown at right.

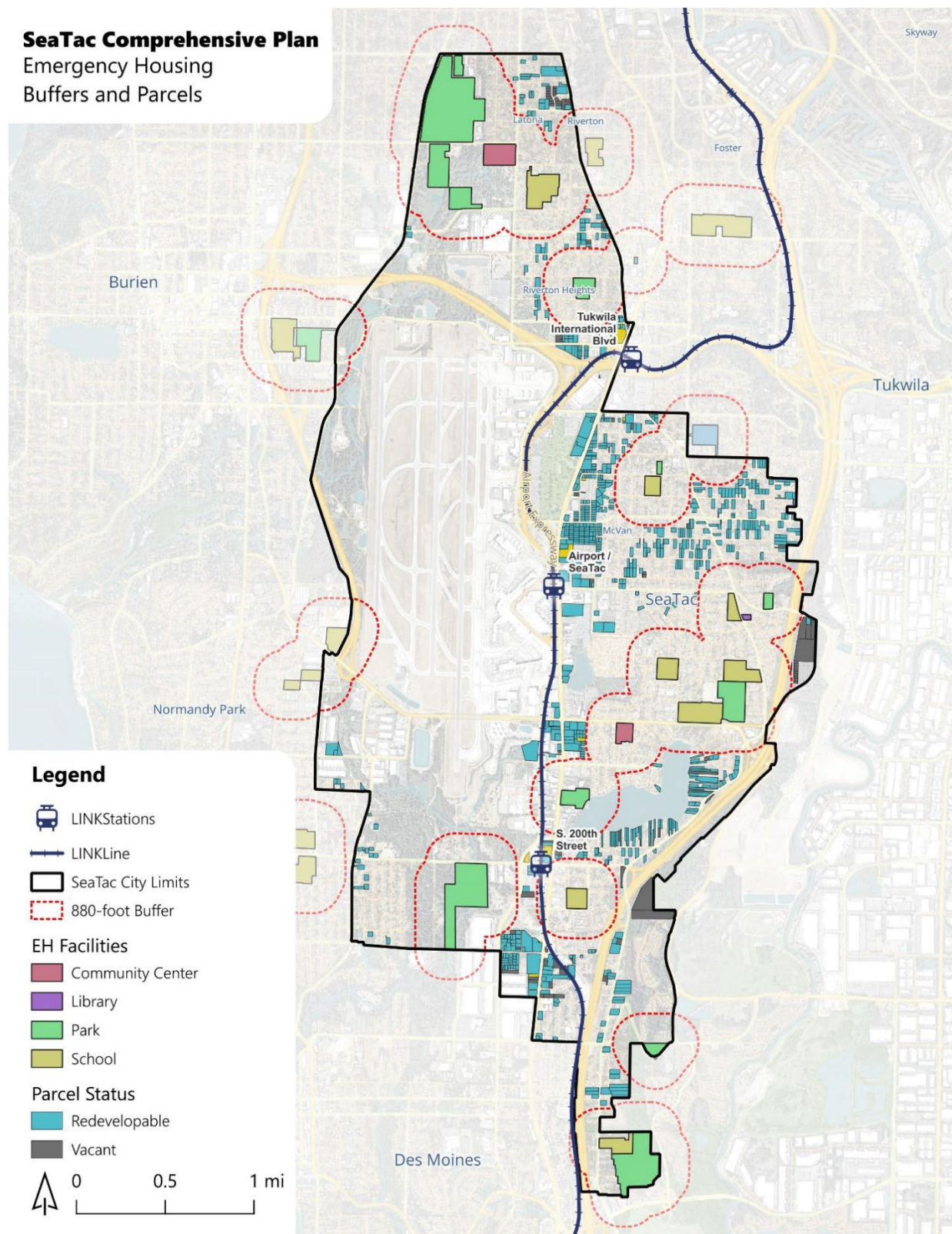
SeaTac's zoning revisions will require a buffer of 880 feet from any elementary-middle school, high school, public park, library, community center, or other emergency housing or emergency shelter facility. In addition, in residential zones (UL, UM, UH, UH-UCR, T, and MHP), no more than one adult bed per 250 square feet of floor area will be allowed, and in all other zones, no more than one adult bed per 35 square feet of floor area will be allowed. Finally, the capacity of each shelter will be capped at 80 residents.

First, the existing community facilities listed above were mapped and an 880-foot buffer was established. These facilities, buffers, and the remaining potential Emergency Housing and Emergency Shelter parcels, classified as "Vacant" or "Redevelopable", are shown below in Figure 17.

Current Zoning Designation	Proposed New Zoning Designation
UL-15,000	RL
UL-9,600	RL
UL-7,200	RL
T	T
UM-3,600	RM
UM-2,400	RM
MHP	MHP
UH-1,800	URH
UH-900	URH
UH-UCR	URH-MU
NB	CS
O/C/MU	UVM
OCM	UVH
CB	CB
CB-C	CB-C
RBX	RBX
I	I
AVC	AVC
AVO	AVO
P	P

² <https://deptofcommerce.box.com/s/1d9d5l7g509r389f0mjpowh8isjpirlh>

Figure 17. Emergency Housing Buffers and Vacant/Redevelopable Parcels



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

In order to account for the requirement that any Emergency Housing or Emergency Shelter facility also have an 880 foot buffer from any other facility, the remaining Vacant and Redevelopable parcels were grouped into non-overlapping areas with centroids separated by 880 feet, totaling 40 potential areas for emergency housing sites. Since it is not known exactly where emergency housing may be built over the next 20 years, this method reasonably estimates the potential siting areas for facilities that would not exceed buffer requirements. Within each area, the net developable square feet of Vacant and Redevelopable parcels (after removing Critical Areas) were averaged, to establish a potential parcel size for each of the 40 areas.

Next, reductions were applied based on zoning within each area. After calculating average parcel size, the acreage was reduced based on the maximum lot coverage in the zone as outlined in the zoning code, along with additional reductions for setbacks in medium- and high-density residential zones where higher lot coverage allowances would be difficult to attain due to required setbacks, based on a average lot dimensions. The resulting buildable parcel square footage was then multiplied by an assumption of building height for emergency housing/shelter uses of 3 stories in low-density residential zones and 4 stories in all other zones. Even though allowed heights are higher in many commercial zones, existing emergency housing and shelter prototypes from across the state detailed in Commerce’s guidance do not exceed 4 stories, so this conservative assumption was applied. Finally, a reduction of 50% was applied to account for potential required parking, open space beyond that provided by lot coverage requirements, and portions of the building potentially used for communal support spaces, as outlined in Commerce’s guidance. The reductions by zone are shown below, for zones considered in this analysis with potentially developable acreage:

Figure 18. Emergency Housing Acreage Reductions by Zone

Zone	Max Lot Coverage	Additional Setback Reduction	Max or Assumed Height (Stories)	Communal Support Spaces Reduction
RL	35%	0%	3	50%
RM	55%	0%	3	50%
URH	75%	25%	4	50%
URH-MU	75%	25%	4	50%
UVH	75%	25%	4	50%
CB	75%	10%	4	50%
CB-C	75%	0%	4	50%
RBX	75%	0%	4	50%

Source: Washington Department of Commerce, Leland Consulting Group

Next, the net resulting square footage of floor area based on the average parcel size of vacant and redevelopable parcels for each of the 40 non-overlapping analysis areas (by zone) was divided by the maximum allowed density of square feet of floor area per bed (35 in residential zones and 250 in commercial zones). This resulted in a capacity (in beds) for a potential emergency housing or shelter site in each of the 40 analysis areas. Finally, for potential sites that showed a capacity of greater than 80 beds, this was capped at 80 beds per the city’s zoning code. **The resulting emergency housing and shelter capacity in SeaTac is 2,485 beds, which exceeds the target of 1,127 with a surplus of 1,128 beds, as shown below.**

Figure 19. Emergency Housing Need and Capacity in SeaTac, 2020-2044

Total Emergency Shelter Need (Beds)	Total Emergency	Surplus/ Deficit
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	Shelter Capacity (Beds)
1,127	2,485
	1,358

Adequate Provisions

In addition to the analysis by income band, cities are also required to show that their housing element “[m]akes adequate provisions for existing and projected needs of all economic segments of the community.” This analysis requires a **comparison of the historic rate of housing production to the rate of housing production needed to meet housing targets by income band**. The results of this analysis are shown below in Figure 16, using multifamily production data from CoStar and middle housing permit data from the Census.

Figure 20. Historic and Target Yearly Production in SeaTac

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

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

As shown, there is no barrier to production of multifamily units overall, but **there are potential barriers to production of middle-income units (i.e. middle housing and ADUs). Therefore, per Commerce guidance, the checklist addressing these potential barriers is included below.** Additionally, even though there is not a demonstrated barrier to the production of units serving households earning 0-80 percent AMI overall, Commerce guidance suggests that cities should complete the checklist provided in the Commerce Housing Element Guidebook to ensure that there are not barriers to the production of subsidized units being produced in the 0-80 percent AMI category, nor to the production of Emergency Housing units. This checklist documents such potential barriers and the actions that the city could take to overcome them. Note that cities do not need to implement these steps as part of the comprehensive plan update, but they can help guide goal and policy development and cities will be required to produce a report documenting their progress towards increasing housing production five years after the adoption of the comprehensive plan.

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

Exhibit B1: Moderate Density housing barrier review checklist

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

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

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Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
PROCESS OBSTACLES			
Conditional use permit process	No	Conditional use permits are only required for multifamily in NB zones and mobile home parks in UM, UH, and UH-UCR zones	
Design review	No	Design review is not required	
Lack of clear and accessible information about process and fees³	No	Information about the process and fees is available	
Permit fees, impact fees and utility connection fees	Maybe	Fees do not seem out of line with what is typical, but it is not clear which fees would apply specifically to middle housing types.	Ensure that fees are not atypically high compared with neighboring jurisdictions. <i>Note that the city is conducting a fee schedule study to ensure consistency with regional fees. Impact fees and stormwater utility connections will be evaluated as part of the forthcoming Middle Housing Code Update in 2025.</i>
Processing times and staffing challenges	No	Local developers and permit customers have commented that SeaTac's permitting process is	

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

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

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

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

⁴ Note that RCW 35A.21.430 expressly states requirements on occupancy, spacing, and intensity of use may not prevent the siting of a sufficient number of permanent supportive housing, transitional housing, indoor emergency housing or indoor emergency shelters necessary to accommodate each code city's projected need for such housing and shelter under RCW 36.70A.070(2)(a)(ii). The restrictions on these uses must be to protect public health and safety.

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	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
Arbitrary limits on number of occupants (in conflict with RCW 35A.21.314)	Yes	Emergency housing and emergency shelters are not allowed to exceed 80 residents (or one adult bed per 250 square feet of floor area) in residential zones	Density limits should not be more restrictive than the zone typically allows.
Requirements for PSH or emergency housing that are different than the requirements imposed on housing developments generally (in conflict with RCW 36.130.020)	Yes	Conditional use permits are required for CRF-I and emergency housing facilities in zones where multifamily is permitted outright. They are always required for PSH that includes more than 5 residents and 2 caregivers.	Ensure that permanent supportive housing follows the same requirements as multifamily housing.
Other restrictions specific to emergency shelters, emergency housing, transitional housing and permanent supportive housing	No	There are no other specific restrictions	