



October 29, 2024

Planning Commission, City of SeaTac  
4800 S. 188th Street  
SeaTac, WA 98118-8605  
[PCPublicComment@seatacwa.gov](mailto:PCPublicComment@seatacwa.gov)

**VIA EMAIL ONLY**

Re: Envision SeaTac 2044: Comprehensive Plan Update Project  
***Public Comments from CPI Bow Lake Estates Owner, LLC Regarding Proposed  
Downzone of Bow Lake Manufactured Home Community Property***

Dear Commissioners:

We appreciate the opportunity to provide additional written comment on the draft SeaTac 2044 Comprehensive Plan Update (the “**SeaTac 2044 Plan**”) on behalf of CPI Bow Lake Estates Owner, LLC (the “**Property Owner**”), which owns property located at 18050 32nd Avenue South, SeaTac, WA 98188 (tax parcel numbers 3423049008 and 3423049096) (the “**Property**”).

As noted in a prior public comment letter submitted on behalf of the Property Owner, we recently learned that the SeaTac 2044 Plan proposes a significant downzone for the Property. The package that is currently before the Commission for discussion would redesignate the Property as Urban Residential Medium (URM) under the Comprehensive Plan and rezone the Property as Manufactured Home Park (MHP) (the “**Bow Lake Proposal**”). The Bow Lake Proposal would also modify the ordinance regulating the current use of the Property for the Bow Lake Estates Manufactured Home Community (“**Bow Lake Community**”).

We write to express several ongoing concerns regarding the Bow Lake Proposal, which are outlined in this letter. We understand and appreciate the City’s desire to protect the ongoing use of the Property for the Bow Lake Community. We share these goals with the City, and the Property Owner has no plans to change this current use of the Property. However, we feel that it would be

premature for the City to proceed with the adoption of the Bow Lake Proposal before its potential impacts to the Property and the community are fully considered. This communication outlines general concerns about the Bow Lake Proposal, although we and the Property Owner have had very little time to study the proposal. For this reason, we may offer further comment on these matters unless the Bow Lake Proposal is removed from the SeaTac 2044 Plan before it is submitted to the City Council for approval.

The Bow Lake Proposal includes changes to the City's regulations governing manufactured home parks ("MHP"), most of which can be found in Section 15.465.600 of the SeaTac Municipal Code (the "Code" or "SMC"). Several provisions of these regulations specifically address existing MHPs and appear to be intended to protect the ongoing use of the Bow Lake Community. However, the language of several provisions is unclear, and does not seem to allow unit owners or the park owner to freely renovate, improve, or replace manufactured home ("MH") units in the Bow Lake Community without bringing the units into compliance with parking requirements and development standards that would apply to new uses.

As you may know, the Bow Lake Community was developed in phases beginning in the 1960s. The age of the housing stock reflects this development timeline and many homes are still original, meaning that even the newest original homes are significantly aged. While these old homes have been satisfactory, they simply are coming to the end of their useful life and will need to be replaced because they are no longer attractive to today's buyers. Even those buyers who seek affordable housing in a manufactured home community are looking for new, modern homes built to U.S. Department of Housing and Urban Development (HUD) standards with attractive layouts, multiple bedrooms, and modern kitchens. Many sites at Bow Lake will not accommodate newer homes that are attractive to today's buyers. In fact, many of the sites are so small, that it is very difficult to find MH units that will fit and when we do, these homes are hard to sell because of their small size. The current and proposed language of the MHP regulations do not seem to appropriately contemplate necessary replacements or renovations of MH units, nor account for other nonconformities that may currently exist in this Community. Unless these provisions are changed, they may operate to force the Property Owner to combine existing lots to comply with current development standards, remove lots from the site plan altogether, or complete prohibitively expensive modifications in order to update units in the future. **In the long run, this could result in a net loss of housing units in the Bow Lake Community.** Moreover, the downzoning may in fact lead to a deterioration of the housing stock itself over time as residents will not be able to make desired improvements or will not be able to replace homes as it is simply too costly to do so. We are bringing this to the Commission's attention because we feel that this cannot be the City's intent.

We are also concerned with the apparent lack of consideration or detailed study of the longer-term impacts of the City's proposal to downzone the entire Property to only allow MH uses. We share the City's desire to maximize housing opportunities, and specifically affordable housing, in the City and in the Bow Lake Community. While the Property Owner has no immediate plans to

redevelop the Property, we understand it was initially designated for higher density uses in the Comprehensive Plan and Code because of its central location in the Urban Center and close proximity to public transit. The bases for these higher-density designation have not changed.

As noted in the Development Capacity Analysis provided by EDA (attached here as **Exhibit A**), up to 2,200 units could be developed on the Property at some time in the future under the density limitations of the current Code. *See, e.g.*, SMC 15.400.100 (residential standards chart); 15.510.050 (density calculations). Further, if even a quarter of these units were developed as affordable housing, this future redevelopment would provide more affordable housing than the total number of homes on the Property today. This downzone was added to the SeaTac 2044 Plan very recently, and we do not see any indication that the City considered this massive decrease in potential housing units, and affordable housing units in particular, prior to adding the Bow Lake Proposal to the package before the Commissioners. But these considerations should be closely analyzed before the City implements a drastic rezone of the entire Property.

Considering the above, we respectfully request that the Planning Commission remove the Bow Lake Proposal from the SeaTac 2044 Plan so that these likely consequences can be adequately studied prior to further formal action with respect to the Property.

Further, if the City elects to proceed with the proposed amendments to its MH regulations, we would ask that the City consider the changes we have proposed in the attached other exhibit to this comment letter. This document (attached as **Exhibit B**) shows our suggested edits to the regulations currently under the Commission's consideration in redline format.

In general, we are concerned about the potential unintended consequences of these regulations being applied to the Bow Lake Community moving forward. And we maintain that a wholesale rezone of the Property without further study would be shortsighted, as well as misaligned with City and Statewide affordable housing and housing density goals. The Property Owner is committed to the continuance of the Bow Lake Community and has no plans to redevelop the Property. But reducing the long-term development opportunities of the Property harms the very people the Bow Lake Proposal is intended to benefit, including the citizens of SeaTac who may ultimately pay higher housing costs because of lost density; the residents of the Bow Lake Community who may be forced to remain in older and deteriorating housing stock for a longer period of time; and any potential future owner of the Property who may be willing to invest in more units of housing for the benefit of all.

We as well as the Property Owner would be happy to provide further comment on the City's plans, or discuss these matters further. We appreciate the Commission's close consideration of these comments.

Sincerely,



Adam Cook  
President  
Commonwealth Real Estate Services

**EXHIBITS:**

- A - EDA Development Capacity Analysis**
- B - Proposed Redline of MH Code Provisions under City Consideration**

October 29, 2024

## **SeaTac Bow Lake Manufactured Housing for 55+ Seniors – Development Capacity Analysis**

Edwards Development & Advisors, LLC (“**Edwards**”) has been asked to provide this development and capacity study in support of Commonwealth Real Estate Services’ review of a proposal to rezone the tract of real property located at 18050 32nd Avenue South, in the City of SeaTac, in the State of Washington, which is associated with King County Assessor’s Tax Parcel Numbers 3423049008 and 3423049096, and currently used for approximately 450 home sites within the Bow Lake Estates Manufactured Home Community (the “**Property**”). As of today’s date, the Property spans several zones under the City of SeaTac (“**City**”) land use and zoning regulations.

The current zoning and lot areas for the two tax parcels is as follows:

**Parcel 1 (342304-9008):** UH-900 and NB = 1,974,216 SF = 45.32 acres

**Parcel 2 (342304-9096):** UH-1800 = 38,160 SF = 0.88 acres

Parcel 1 zoning is Urban High Density (UH) 900, allowing for 1 unit per 900 SF of lot area. This area would yield approximately 2,193 units. A small portion of Parcel 1 at the grocery store is zoned Neighborhood Business (NB). Parcel 2 zoning is UH-1,800, which generally allows for 1 unit per 1,800 SF of lot area. This area would yield 21 units of additional housing.

Thus, based on the current approximate lot areas and zoning of the property, the total potential multi-family residential development capacity would be approximately 2,200 units of housing.

Both parcels are currently in the City Center Overlay District, which was established by the city to specifically encourage high density multi-story development, and encouraged the creation of walkable high-density mixed-use urban centers in the city. The “high-density” goals generally include 3-story and 4-story (55’ height limit) mixed-use residential units with a retail base on the western half of the site, and single-use multi-family buildings on the eastern half of the site. The high-density zoning would have required master planning with the city staff, design review process and city council approval, and the total potential number of residential units and retail square footage would be based upon the future buildings’ bulk, scale, setbacks and pedestrian amenities. However, based on our review of the current land use and zoning regulations, we would not expect the total number of residential units to be less than the 2,200 unit capacity calculated above.

While we understand the ownership does not plan to redevelop the Property, we believe that future redevelopment of the site could significantly expand the affordable housing stock in the City. For example, even if only 25% of the units in a future redevelopment scenario were affordable, this could yield 550 units of affordable housing. Thus, even with a small percentage of affordable units, this kind of redevelopment could add 100 units of affordable housing in the City, not to mention approximately 1,650 market rate units. Considering this, the proposal that is currently being considered by the City’s Planning Commission would drastically reduce the potential future housing that could be provided on the Property.

**Code Provisions Affecting MHPs (proposed 2024 code revisions incorporated;  
[proposed changes shown in redline format](#))**

**15.105.130 “M” Definitions.**

Manufactured Home Park - Land under single ownership and control designed and used for the temporary or permanent placement of two (2) or more manufactured homes for human occupancy. [Any Manufactured Home Park that was established prior to the effective date of this code shall be considered an “existing” park.](#)

**15.200.030 Zones and Map Designations – Purpose Statements**

**D. Manufactured Home Park Zone (MHP).** The purpose of this zone is to provide areas for existing manufactured/mobile home parks [at their current densities](#), locate potential sites for relocation purposes, and/or allow the creation of parks which serve residents while providing sense of ownership and pride.

**15.400.100 Residential Standards Chart**

<b>DEVELOPMENT STANDARDS</b>	<b>UH-1,800</b>	<b>UH-900</b>	<b>MHP(1)</b>	<a href="#">(1) No development standard set forth in this table may be applied to limit the renovation, replacement, or expansion of any individual unit in an existing Manufactured Home Park, subject to the expansion limitations set forth in SMC 15.465.600(D)-(4).</a>
<b>MINIMUM LOT AREA</b>	1,800 SF of lot area per unit (2)(3)(5)(6)	900 SF of lot area per unit (2)(3)(5)(6)	N/A	(2) Minimum lot size 7,200 square feet.  (3) Small lot single-family minimum lot size is 3,000 square feet.  (5) Assisted living facilities and continuing care retirement communities are permitted at

<b>DEVELOPMENT STANDARDS</b>	<b>UH-1,800</b>	<b>UH-900</b>	<b>MHP(1)</b>	(1) No development standard set forth in this table may be applied to limit the renovation, replacement, or expansion of any individual unit in an existing Manufactured Home Park, subject to the expansion limitations set forth in SMC 15.465.600(D)-(4).
				twice (2X) the density of the zone, measured per room.  (6) Retirement apartments are permitted at one and one-half (1.5X) the density of the zone, measured per unit.
<b>MINIMUM AREA – DEVELOPMENT SITE</b>	N/A	N/A	3 acres	
<b>MINIMUM LOT WIDTH</b>	N/A	N/A	N/A	
<b>MINIMUM FRONT YARD SETBACK</b>	10'	10'	N/A	Setback dimensions may change subject to landscape requirements. See SMC 15.445.010(C) in the landscaping chapter for applicable standards.
<b>MAXIMUM FRONT YARD SETBACK</b>	N/A	N/A	N/A	Setback dimensions may change subject to landscape requirements. See SMC 15.445.010(C) in the landscaping chapter for applicable standards.

<b>DEVELOPMENT STANDARDS</b>	<b>UH-1,800</b>	<b>UH-900</b>	<b>MHP(1)</b>	<a href="#">(1) No development standard set forth in this table may be applied to limit the renovation, replacement, or expansion of any individual unit in an existing Manufactured Home Park, subject to the expansion limitations set forth in SMC 15.465.600(D)-(4).</a>
<b>MINIMUM SIDE YARD SETBACK</b>	5'	5'	5'	Setback dimensions may change subject to landscape requirements. See SMC <a href="#">15.445.010(C)</a> in the landscaping chapter for applicable standards.
<b>MINIMUM REAR YARD SETBACK</b>	5'	5'	5'	Setback dimensions may change subject to landscape requirements. See SMC <a href="#">15.445.010(C)</a> in the landscaping chapter for applicable standards.
<b>MAXIMUM BUILDING LOT COVERAGE</b>	75%	75%	N/A	
<b>MAXIMUM IMPERVIOUS SURFACE</b>	N/A	N/A	N/A	
<b>MAXIMUM STRUCTURE HEIGHT</b>	55'	55'	N/A	

**Chapter 15.465 RESIDENTIAL STANDARDS AND REGULATIONS**

**15.465.600 Manufactured Home Park**



**A. Manufactured Home Park Zone Classification.** The purpose of this zone is to provide areas for existing manufactured home parks [to be used at their current densities](#), locate potential sites for relocation purposes, and/or allow the creation of parks which serve residents while providing sense of ownership and pride.

**B. Definitions.**

Leasable Space - That area within mobile home parks designated on an approved master plan as lots for locating mobile home units with utility hook-ups.

Recreational Vehicle (RV) - A vehicle designed primarily for recreational camping, travel or seasonal use which has its own power or is towed by another vehicle, limited to motor home, travel trailer, camping trailer, park trailer, multi-use vehicle and truck camper.

Utility Hook-Ups - The minimum required utility hook-up apparatus (pursuant to city approval) including, but not limited to, sanitary sewer, water and electrical services.

**C. Manufactured Homes – Standards for Locating on Individual Lots.** Manufactured homes [not placed within an existing Manufactured Home Park](#) may be located within the RL, RM, and MHP zone classifications; provided the [following](#) conditions [set forth below in Subsections \(C\)\(1\) through \(C\)\(4\)](#) are met.: [Manufactured homes may be placed within an existing Manufactured Home Park subject to the requirements of Subsection \(D\), below.](#)

1. The home shall be installed in accordance with the manufacturer's instructions, in accordance with the requirements of Chapter 296-150F or 296-150M WAC, as applicable, and shall be hooked up to all utility services;

2. The home must meet the required sound insulation standards as set forth by applicable Federal Aviation Administration regulations when located within established noise remedy zones;

3. Minimum size shall be eight hundred sixty-four (864) square feet;

4. The home shall have exterior siding and skirting similar in appearance to siding materials commonly used on conventional site-built building code single-family residences.

**D. Manufactured Home Park – Standards for Existing Parks.**

1. [Existing m](#)Manufactured home parks [established prior to the effective date of this code](#) shall continue to be governed by all standards relating to density, setbacks, landscaping and off-street parking in effect at the time they were approved.

2. Placement of new accessory structures and replacement of mobile homes, either standard or nonstandard, in these Manufactured home parks shall be governed by the dimensional standards in effect when the parks were approved. If the information is not available to determine the standards, then the average of the prevailing setbacks on the pads to either side of the proposed new or replacement structure shall apply.

3. No spaces or pads in an existing mobile home park shall be used to accommodate RVs except when the spaces or pads were specifically designated (or approved) for RVs by the City pursuant to subsection (G) of this section, Recreational Vehicle Areas, or by King County at the time the park was established.

4. No requirement of this Subsection 15.465.600(D) may be applied to limit the renovation or replacement of any individual unit within an existing Manufactured Home Park, require the merger of two pads within such Park, nor otherwise reduce the density of any existing Manufactured Home Park; provided, however, that any expansion to the footprint of an individual unit that is nonconforming to this code, or that would become more nonconforming to this code with such expansion, shall be limited to the addition of 20% of the total square footage of the unit when this Subsection (D)(4) became effective.

5. ~~All mobile homes installed in established Manufactured Home pParks shall meet the minimum standards set forth by the existing all applicable HUD standards and applicable Building Code and any amendments in effect standards.~~

**E. Manufactured Home Park – Standards for New Parks.** New mobile home parks shall be developed in the mobile home park zone and subject to the following standards:

1. A mobile home park shall be at least three (3) acres in area.

2. Residential densities in a mobile home park shall be as follows:

a. Five (5) dwellings per acre in a RL zone classification;

b. Seven (7) dwellings per acre in a RM zone classification.

3. A manufactured home park shall be exempt from the building footprint and impervious surface limits set forth in SMC 15.400.100, Residential Standards Chart, and 15.400.200, Commercial, Industrial, Park Standards Chart.

4. At least two (2) off-street parking spaces shall be required for each manufactured home and located on or adjacent to each mobile home pad.

5. Internal roads and sidewalks shall provide access to each manufactured home space and shall be constructed in accordance with the adopted City road standards for residential minor access streets.

6. Access to the park site shall be from a major or arterial roadway.

7. There shall be a minimum of sixteen (16) feet of separation maintained between all manufactured homes on the site. Accessory structures shall be located no closer than:

a. Ten (10) feet to manufactured homes on adjacent spaces unless constructed of noncombustible materials, in which case the minimum setback shall be five (5) feet;

b. Five (5) feet to accessory structures of manufactured homes on adjacent spaces; and

c. Five (5) feet to the manufactured home or other accessory structures on the same space. A carport or garage may be attached to the manufactured home, and the separation may be waived when such structures are constructed of noncombustible materials.

8. All manufactured homes shall be pit set and tied down per manufacturer's standards or as prescribed by a licensed engineer in the State of Washington.

9. A manufactured home park may include a storage area for RVs owned by residents of the park; provided the storage area contains no utility hook-ups. No RV within the storage area shall be used as living quarters.

**F. Manufactured Mobile Home Park – Alternative Design Standards.** As an alternative to the building separation and internal streets standards of subsection (E) of this section, Manufactured Home Park – Standards for New Parks:

1. Building separation requirements or setbacks between manufactured homes and accessory structures on adjacent spaces may be modified, provided:

a. The common walls meet the fire protection standards set forth in the Building Code and the standards set forth in the Fire Code for duplexes, multi-family and condominium developments, as applicable; and

b. Rental agreements, clauses, by-laws or other legal mechanisms stipulate maintenance responsibilities for structures, fences and yards; and

c. An open space area for children shall be provided at a ratio of ten percent (10%) of the total park area.

2. Private streets may be used with a minimum driving surface of twenty-two (22) feet in width, provided:

a. The circulation/street pattern is established in one (1) direction and approved by the Fire Marshal;

b. All required parking is located off-street and as specified in Chapter 15.455 SMC, Parking and Circulation; and

c. Such streets shall not serve over one hundred (100) dwelling units within the park.

## **G. Recreational Vehicle Areas.**

1. Purpose. To allow the economic use of perimeter areas in manufactured home parks; to foster affordable housing options; to create designated areas for recreational vehicles; to allow alternative use of land within manufactured home parks, yet protect existing and future manufactured home units.

2. Siting Standards of Recreational Vehicles in Existing Manufactured Mobile/Manufactured Home Parks.

a. A site plan shall be submitted with the following standards for review and approval by the Director.

b. Recreational Vehicle Sites. RVs may be located in a perimeter designated area. The designated area shall be a logically geometric shape, which does not encroach significantly into the area for manufactured mobile/manufactured home units.

It is provided, however, that once the owner of a manufactured home park has given notice of intention to close the manufactured home park pursuant to any applicable relocation plans, pending final closure of the manufactured home park, and in keeping with the provisions of subsections (G)(2)(c), (d) and (e) of this section, the owner may site recreational vehicles in such manufactured home spaces as may become vacant during the closure period without regard to the number of such recreational vehicles or their locations within the manufactured home park. The closure period, which shall include the period of time from the date of the notice of the intention to close the manufactured home park to the final closure of the manufactured home park, shall not exceed one (1) year.

c. Recreational vehicles shall hook up to the utility hook-ups (under permits) and maintain the minimum standards on those utilities. d. Recreational vehicles shall not remain on the leased space longer than one hundred eighty (180) days a year. The recreational vehicle must be physically detached from the utility hook-ups and out of the park for at least twenty-four (24) hours before hooking up again.

e. The recreational vehicles shall meet all applicable health and building standards.

f. The recreational vehicle section shall be screened from both the road and the manufactured home park with Type IV landscaping at a width of five (5) feet.

**H. Manufactured Home Park Relocation Standards.**

1. The owner of a manufactured home park that is relocating must comply with the applicable requirements of Chapters 59.20 and 59.21 RCW.

2. The owner of a manufactured home park that is relocating must notify the City prior to giving notice to the tenants in accordance with RCW 59.20.080(1)(e).