



# GMA Racially Disparate Impact Report

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City of Enumclaw

Enumclaw Middle Housing Project  
April 2023

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## GMA Racially Disparate Impact Report

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## Executive Summary

In 2021, the Washington State legislature enacted House Bill 1220. House Bill 1220 amended the *Growth Management Act* community planning requirements related to affordable housing, updated requirements for local governments to plan for housing for all economic segments of the population, and added a new requirement for local governments to identify, evaluate, and amend local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing. These amendments are codified in *Revised Code of Washington* (RCW) 36.70A.070(2) and are required to be addressed in the City of Enumclaw's (City's) Comprehensive Plan housing element.

This report contains the following: (1) an assessment of housing needs in the City and (2) the evaluation necessary to update the housing element of the City's Comprehensive Plan to address disparate impacts and displacement required by RCW 36.70A.070(2)(e) through (g) and policy recommendations to support compliance with RCW 36.70A.070(2)(h).

## Housing Needs and Characteristics

The City's housing stock is primarily (59 percent) single-family homes. Approximately 31 percent of housing is more affordable housing types such as apartments, manufactured homes, duplexes or triplexes. The majority of land designated for housing by the Comprehensive Plan and zoning is limited to primarily single-family dwellings.

Housing affordability is an issue for approximately 1,550 (32 percent) of the City's households who are cost burdened.<sup>1</sup> Lack of affordable housing impacts primarily those with incomes less than 80 percent of the U.S. Department of Housing and Urban Development (HUD) area median family income (HAMFI), which includes households of color and those who rent their housing. The City will continue to have a need for the following:

- Housing types suitable for residents over the age of 65.
- Rental housing affordable to all age groups but especially for those under the age of 35.
- Housing choices affordable to households that make 80 percent or less of the HAMFI.

## Disparate Impacts and Exclusion

The evaluation shows indicators of exclusion, disparate impacts in housing, and displacement risk in the City. These indicators include fewer households of color, lower homeownership rates, and higher poverty rates for people of color in the City. The following are likely the primary factors contributing to inequity:

- **Regional and systemic root causes:** Although Enumclaw is less diverse than King County, there has been growth in households of color over the last decade indicating that observed impacts are influenced by larger regional and systemic causes, such as income disparity. Regionally, households of color receive lower incomes than white households, making homeownership difficult and resulting in higher rates of cost-burdened households.
- **Zoning or housing policies:** Zoning regulations and policies limit less-expensive housing types, such as middle housing, apartments, or manufactured homes, and promote or require development of more expensive single-family homes on large lots. These policies contribute to exclusion in the following ways: (1) excluding households of color because they cannot afford to live in the community and (2) limiting availability of transit service because of low housing density.
- **Limited transit service:** The City is far from the region's employment centers and has limited public transit opportunities, which likely makes it a more difficult place for households of color to live because

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<sup>1</sup> As of 2021, there were 4,948 households in the City (Table S1101; UCSB n.d.) and approximately 32 percent of households in the City are cost-burdened (USCB 2021); this equals approximately 1,550 households that are cost-burdened in the City.

they have less access to cars than white households in this area. In King County, 13 percent of households of color do not have access to a car, whereas only 9 percent of white households do not have access to a car. The percentage of Black or African American households without access to a car is even higher at 19 percent (National Equity Atlas n.d.).

### Displacement

The evaluation indicates that rising housing costs that can cause risk of displacement results in 32 percent cost-burdened households in the City. As prices and rents rise in the area, cost-burdened households will spend more of their income on housing and will have less available money for other essentials, such as food or transportation. This rise in prices may force cost-burdened households to relocate if they are unable to continue to pay for housing.

Existing businesses may be subject to displacement as land prices increase. A few areas with existing businesses shown as redevelopable on the City's buildable lands map could be vulnerable to displacement as land prices increase in the area (Appendix C). If the areas of displacement have a higher proportion of businesses owned by people of color, this could result in cultural displacement.

### Policy Recommendations

Local policies and regulations that may be contributing to disparate impacts and exclusion are related to zoning, including prevalence of single-family residential zoning with large minimum lot sizes and zoning that limits most affordable housing types such as duplexes and triplexes to a few areas in the City. Many of these impacts can be mitigated by inclusionary zoning measures that allow a wider variety of housing types throughout the City and increase the availability of affordable housing. Increasing the availability of affordable housing choices also mitigates displacement risk of cost-burdened households.

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## Acronyms and abbreviations

ACS	American Community Survey
City	City of Enumclaw
EHD	Environmental Health Disparity
EMC	<i>Enumclaw Municipal Code</i>
FMR	fair market rent
GMA	<i>Growth Management Act</i>
HAMFI	HUD area median family income
HUD	U.S. Department of Housing and Urban Development
MHI	median household income
PSRC	Puget Sound Regional Council
RCW	<i>Revised Code of Washington</i>
RMHP	Residential Manufactured Home Park
SFR	single-family residential
SR	State Route

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## Definitions

**American Community Survey:** An ongoing survey conducted by the U.S. Bureau of the Census that collects demographic and socioeconomic information on a wide variety of topics, including population, race and ethnicity, income, jobs, occupations, education attainment, tenure, and housing characteristics.

**Affordable Housing ( *Enumclaw Municipal Code 3.60.020.A*):** Residential housing that is rented by a person or household whose monthly housing costs, including utilities other than telephone, do not exceed 30 percent of the household's monthly income.

**Affordable housing (RCW 36.70a.030(2)):** , Unless the context clearly indicates otherwise, residential housing whose monthly costs, including utilities other than telephone, do not exceed 30 percent of the monthly income of a household whose income is:

- (a) For rental housing, 60 percent of the median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development; or
- (b) For owner-occupied housing, eighty percent of the median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development.

**Community planning requirements:** Requirements set forth in the Growth Management Act, which requires jurisdictions to plan for population and job growth and develop Comprehensive Plans for their jurisdictions, which are aligned with countywide planning policies and projections of population from the Office of Financial Management (Washington State Department of Commerce, 2022).

**Cost-burdened households:** Households that pay more than 30 percent of their household income for housing, including rent or mortgage and utilities. Severely cost-burdened households are those that pay more than 50 percent of their household income for housing.

**Discriminatory effect:** The effect, regardless of intent, of differentiated outcomes for a group based on a protected classification. May be an action or failure to act. Protected classifications include race/color, national origin, religion/creed, sex/gender/domestic violence status, familial status, disability, marital status, sexual orientation, and military/veteran status (Washington State Department of Commerce, 2022).

**Disinvestment:** A process by which a community is not prioritized for investment, or by which a system, policy or action disincentivizes investment in a specific area. Disinvestment processes occur over time, often in the long term (Washington State Department of Commerce, 2022).

**Disparate impacts:** When policies, practices, rules, or other systems result in a disproportionate impact on one or more racial groups, also known as "racially disparate impacts," as described in RCW36.70A.070(2)(e) and (f).

**Displacement:** The process by which a household is forced to move from its community because of conditions beyond their control (Washington State Department of Commerce, 2022).

**Displacement, Physical:** Households are directly forced to move for reasons such as eviction, foreclosure, natural disaster or deterioration in housing quality (Washington State Department of Commerce, 2022).

**Displacement, Economic:** Households are compelled to move by rising rents or costs of home ownership like property taxes (Washington State Department of Commerce, 2022).

**Displacement, Cultural:** Residents are compelled to move because the people and institutions that make up their cultural community have left the area (Washington State Department of Commerce, 2022).

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**Displacement risk:** The likelihood that a household, business or organization will be displaced from its community (Washington State Department of Commerce, 2022)

**Environmental health:** The processes by which environmental conditions affect human health.

**Environmental Health Indicator:** A specific environmental risk factor or a specific measure of population susceptibility or vulnerability. Indicator refers to the measure of a condition that is tracked or assessed. These conditions fall under the categories of sensitive populations, socioeconomic factors, environmental effects, or environmental exposures. Examples of indicators include proximity to toxic waste, poverty, and unaffordable housing.

**Exclusion in housing:** The act or effect of shutting or keeping certain populations out of housing within a specified area in a manner that may be intentional or unintentional but which leads to non-inclusive impacts.

**Extremely low-income household :** A single person, family, or unrelated persons living together whose adjusted income is at or below 30 percent of the median household income adjusted for household size, for the county where the household is located, as reported by the U.S. Department of Housing and Urban Development (HUD; RCW 36.70A.030(11)).

**Fair Market Rents (FMRs):** Represent the cost to rent a moderately priced dwelling unit in the local housing market. HUD annually estimates FMRs for Office of Management and Budget defined metropolitan areas, some HUD-defined subdivisions of Office of Management and Budget metropolitan areas and each nonmetropolitan county. FMRs are used by HUD to determine payment standard amounts for the Housing Choice Voucher Program to determine initial renewal rents for some expiring project-based Section 8 contracts and for other HUD programs.

**Gentrification:** The process in which the character of an area is changed, resulting in households being unable to remain in their neighborhood or move into a neighborhood that would have been previously accessible to them. This is also referred to as “neighborhood exclusionary change” or “exclusionary displacement.”

**Housing Choice Vouchers (Section 8):** Allow low-income households to rent homes on the private market. The voucher pays the difference between what the household can afford to pay and the market rate. The Housing Choice Voucher Program is administered locally by the King County Housing Authority.

**HUD Area Median Family Income (HAMFI):** The median family income calculated by HUD for each jurisdiction to determine FMRs and income limits for HUD programs, such as eligibility for income-restricted housing units or Section 8 vouchers. HAMFI will not necessarily be the same as other calculations of median incomes (such as a simple Census number) due to a series of adjustments that are made. HAMFI is not calculated at the City level. The City is part of the larger metropolitan area that includes King County.

**Inclusionary zoning:** A regulatory tool that requires permanent affordable units to be included within new residential development projects, or requires payment for construction of such units elsewhere (fee-in-lieu). “Permanent” refers to affordable unit availability in the long term, specifically, for 50 years as defined by Washington code (Washington State Department of Commerce, 2022).

**Infrastructure:** The facilities and systems that serve a country, city, or area, such as transportation, parks, communication systems, energy and utility systems, and schools.

**Land disposition policies:** Conversion of underutilized and surplus public land for other uses, guided by state law. State law has identified affordable housing as a public benefit and allows cities to sell or lease land at a reduced cost, or donate it altogether, for development of affordable housing.

**Low-income household :** A single person, family, or unrelated persons living together whose adjusted income is at or below 80 percent of the median household income adjusted for household size, for the county where the household is located, as reported by HUD (RCW 36.70A.030(16)).

**Market forces:** Economic factors that impact the provision, price, or demand for housing.

**Median Household Income (MHI):** The household income at which half of all households is above and half is below as reported by the American Community Survey (ACS) 2015-2019 Five-year Estimates, Table S2503 (USCB 2021). The median is typically a better measure than average income because averages tend to be skewed by a few extremely high or low values. MHI is typically lower than the HAMFI.

**Moderate-income household :** Single person, family, or unrelated persons living together whose adjusted income is at or below 120 percent of the median household income adjusted for household size, for the county where the household is located, as reported by the United States department of housing and urban development (RCW 37.70A.030(18)).

**Permanent supportive housing :** Subsidized, leased housing with no limit on length of stay that prioritizes people who need comprehensive support services to retain tenancy and utilizes admissions practices designed to use lower barriers to entry than would be typical for other subsidized or unsubsidized rental housing, especially related to rental history, criminal history, and personal behaviors. Permanent supportive housing is paired with on-site or off-site voluntary services designed to support a person living with a complex and disabling behavioral health or physical health condition who was experiencing homelessness or was at imminent risk of homelessness prior to moving into housing to retain their housing and be a successful tenant in a housing arrangement, improve the resident's health status, and connect the resident of the housing with community -based health care, treatment, or employment services. Permanent supportive housing is subject to all of the rights and responsibilities defined in chapter 59.18 RCW (RCW 37.70A.030(19)).

**Very low-income household :** A single person, family, or unrelated persons living together whose adjusted income is at or below 50 percent of the MHI adjusted for household size, for the county where the household is located, as reported by HUD (RCW 36.70A.030(11)).

**Vulnerable populations (RCW 70A.(14)(a)):** Groups that are more likely to be at higher risk for poor health outcomes in response to environmental harms due to: (i) Adverse socioeconomic factors, such as unemployment, high housing and transportation costs relative to income, limited access to nutritious food and adequate health care, linguistic isolation, and other factors that negatively affect health outcomes and increase vulnerability to the effects of environmental harms; and (ii) sensitivity factors, such as low birth weight and higher rates of hospitalization. "Vulnerable populations" include, but is not limited to:

- (b) Vulnerable populations include, but are not limited to, the following:
  - (i) Racial or ethnic minorities
  - (ii) Low-income populations
  - (iii) Populations disproportionately impacted by environmental harms
  - (iv) Populations of workers experiencing environmental harms

## 1. Introduction

In 2021, the Washington State legislature enacted House Bill 1220. House Bill 1220 amended the *Growth Management Act* (GMA) community planning requirements related to affordable housing, updated requirements for local governments to plan for housing for all economic segments of the population, and added a new requirement for local governments to identify, evaluate, and amend local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing. These amendments are codified in *Revised Code of Washington* (RCW) 36.70A.070(2) and are required to be addressed in the City of Enumclaw's (City's) Comprehensive Plan housing element.

The Enumclaw Middle Housing Project is a project funded by a grant from the Washington Department of Commerce to evaluate racially disparate impacts in the community, identify policies and regulations that may be contributing to inequity, and review opportunities to increase "middle housing" within the City. Middle housing is house-scale buildings located in single-family neighborhoods that contain more than one housing unit such as duplexes, triplexes, and accessory dwelling units. The project will achieve the following:

- Complete the analysis of disparate impacts, displacement, and exclusion in housing required by GMA.
- Recommend changes to policies and regulations that may contribute to disparate impacts, displacement, and exclusion in housing.
- Evaluate potential zoning and regulatory measures to increase "middle housing" within the City.
- Consider design standards to address neighborhood compatibility.

This report contains the evaluation of disparate impacts and the identification of local policies and regulations required by RCW 36.70A.070(2)(e) through (g) and policy recommendations to support compliance with (h) as it does the following:

(e) Identifies local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:

- (i) Zoning that may have a discriminatory effect;
- (ii) Disinvestment; and
- (iii) Infrastructure availability;

(f) Identifies and implements policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions;

(g) Identifies areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments; and

(h) Establishes antidisplacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.

## 2. Community Profile

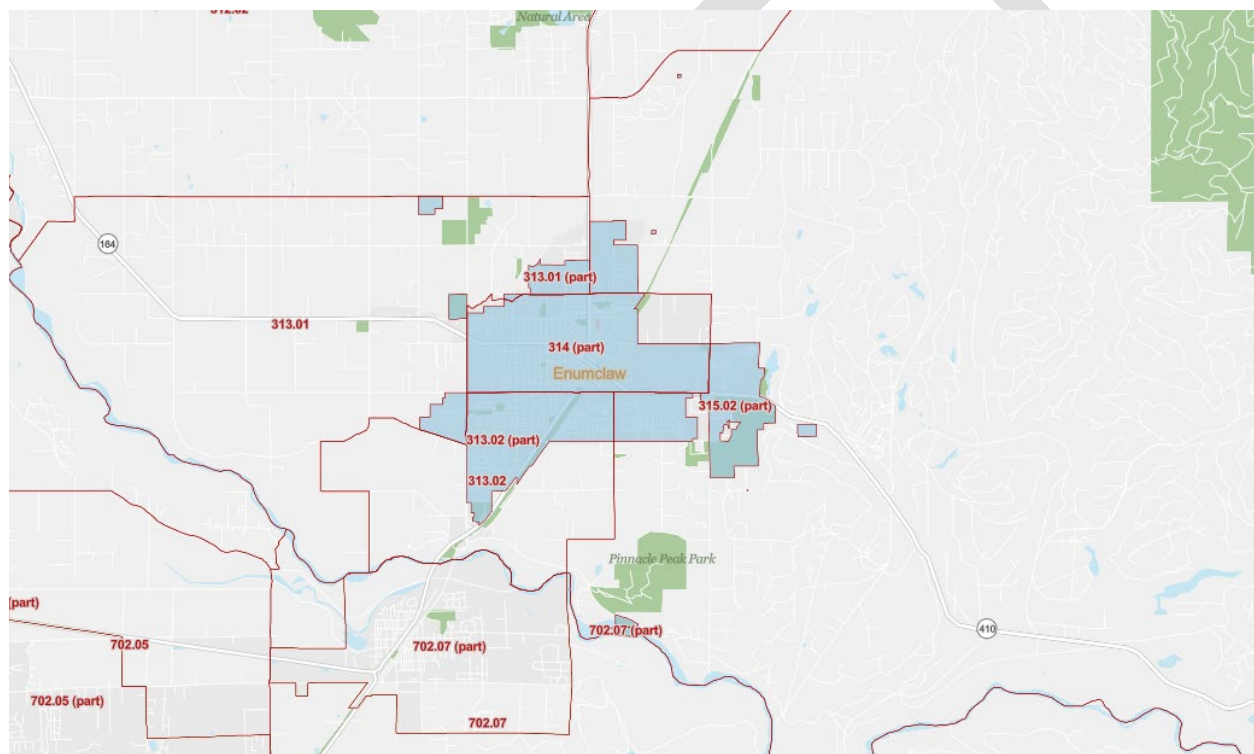
Understanding the City's community profile provides regional location context, information about the City's population, demographics, and housing characteristics. Lack of affordable housing impacts primarily those with incomes less than 80 percent of the HUD area median family income (HAMFI), which includes households of color and those who rent their housing.

### 2.1 Regional Location and Context

The City is in suburban southeast King County, approximately 42 miles from Seattle and 28.4 miles from Tacoma. Enumclaw is approximately 30 to 40 minutes travel time via automobile from the closest employment and activity centers in the Cities of Seattle, Renton, Bellevue, and Tacoma. It is served by limited bus transit via Route 915 that connects to Auburn via State Route (SR) 164.

The City is within four census tracts as shown on Figure 2-1. The census tracts extend beyond the City boundary but can be used for comparative purposes. Sociodemographic characteristics of the census tracts are summarized in Table A-2, Appendix A.

Figure 2-1. Enumclaw Census Tracts



Source: USCB2020.

### 2.2 Population and Demographics

The population and demographic data provide the City information about how much housing is needed, for whom, and whether it can be used by the City to plan for the future to ensure that housing needs of the community can be met.

### 2.2.1 Population and Households

The population and number of households provide information about how much housing is needed today and how much housing the City should plan for in the future to ensure that housing needs of the community can be met. As of 2021, the City’s population was 12,543, and there were 4,948 households (Table S1101; USCB n.d). Between 2010 and 2020, household size grew from 2.37 to 2.41 persons per household, and the population increased 11.6 percent (USCB n.d).

The 2019 to 2044 housing target for the City is 1,057 housing units (King County 2021 a). The City is required to ensure that there is sufficient land zoned and available to accommodate the housing target. The City is also required to ensure that there are sufficient provisions for housing for all types of households, including very low-, low-, and moderate-income households.

### 2.2.2 Age Distribution

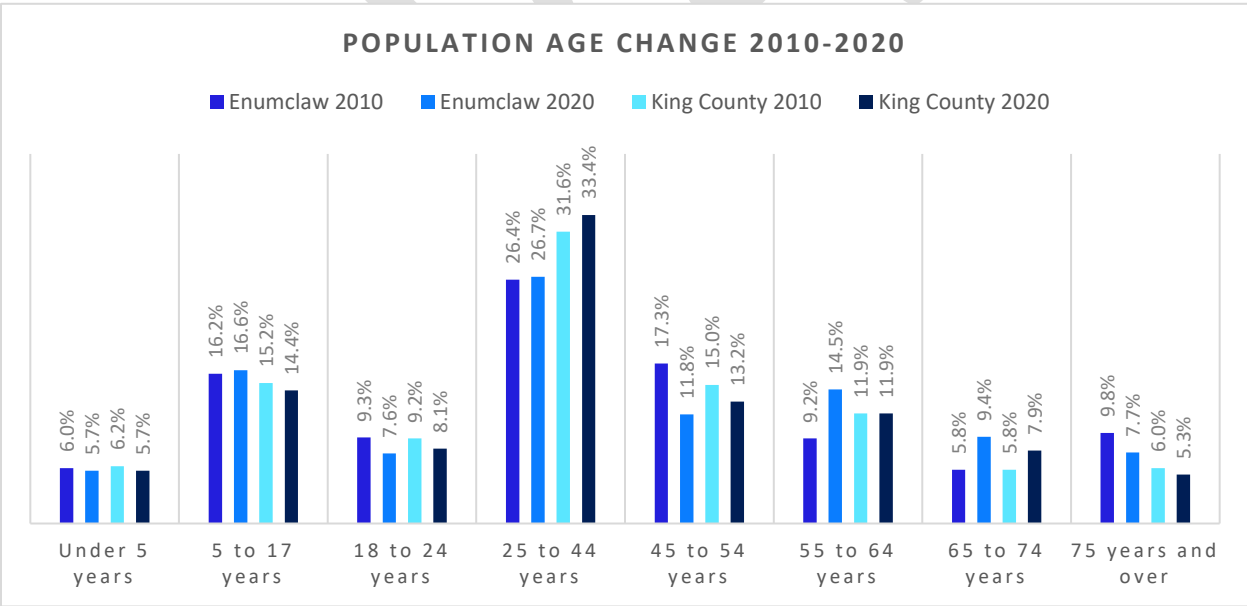
The distribution of age is an indicator of the type of housing that may be necessary to meet the needs of the community. Older households generally need smaller homes than families with children. Older households also typically have lower incomes and are thus more vulnerable to economic displacement.

The City’s community is older than the general population in King County, with a median age of 39.3 compared with King County’s median age of 37. However, between 2010 and 2020, the City’s population became younger with a reduction in median age from 41.2 to 39.3. The City has a higher proportion of school-age children (under 17 years), residents 55 to 64 years of age, and elderly residents (over 65 years) than does King County (Figure 2-2). (USCB n.d).

Age distribution for the City is summarized as follows:

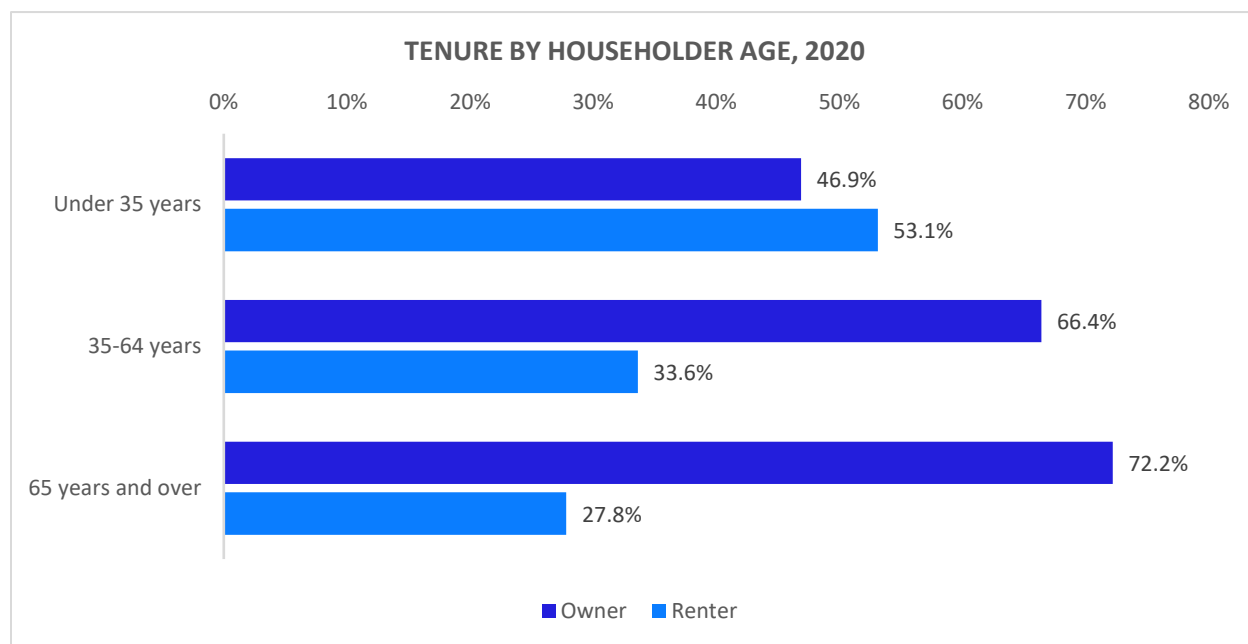
- The City will continue to have a significant need for housing types suitable for elderly residents as residents in the 55- to 64-year and 65- to 74-year cohort age.
- Rental housing is important for those under the age of 35 (Figure 2-3).

Figure 2-2. Population Age Comparison: Enumclaw and King County



Source: ACSTable S010 for Enumclaw City and King County for 2010 and 2020 (USCB n.d).

Figure 2-3. Tenure by Householder, 2020



Source: ACSTable B25007 for Enumclaw City in 2020 (ACS 2020).

### 2.2.3 Vulnerable Populations

Vulnerable populations are those groups at higher risk for poor health outcomes due to a variety of factors, including high housing costs. Vulnerable people include, but are not limited to, those with disabilities, racial or ethnic minorities, low-income populations, and people over the age of 65 who live alone.

Approximately 14 percent of the City’s population (1,743 residents) live with a disability. Disabilities include vision, hearing, ambulatory, cognitive, self-care, and independent living. People living with disabilities have very low incomes. The median income for disabled people is who earn income is \$29,151 (USCB n.d.).

There are approximately 2,239 people over the age of 65; of those, 42 percent (949) live alone. People over the age of 65 also have lower incomes. The median household income (MHI) for people over the age of 65 is \$42,500 (Table S1903; USCB n.d.).

Vulnerable populations for the City are summarized as follows:

- There are approximately 2,692 residents who are considered vulnerable living in the City.
- These households are extremely low- and very low-income households.

### 2.2.4 Race and Ethnicity

Both the City and King County are becoming more diverse (Figure 2-4 and Figure 2-5). Between 2010 and 2020, the number of non-white and Hispanic households nearly doubled, growing from 1,202 to 2,430 residents (Figure 2-4). With 21.1 percent of the population identifying as a race other than white, the City is less racially diverse than King County, with 41.8 percent of its population identifying as a race other than white (Figure 2-4). Population by race and ethnicity is shown in Table A-3, Appendix A.

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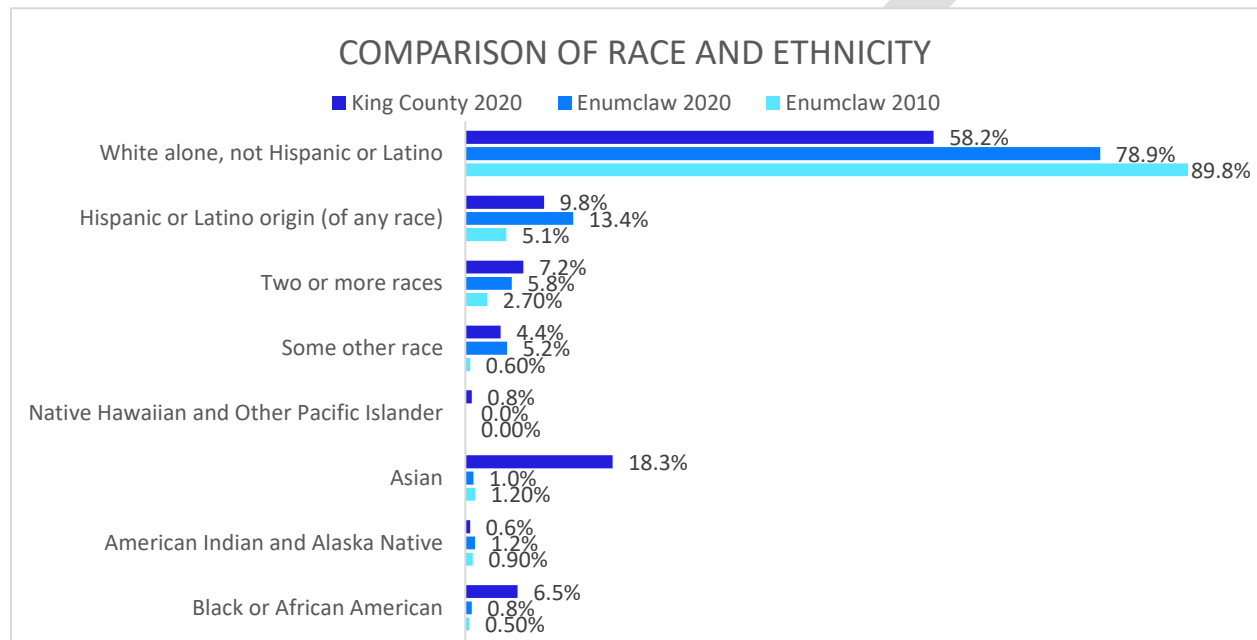
The City attracted additional households between 2010 and 2020 in the following racial/ethnic groups:

- Hispanic/ Latino
- Two or more races
- Some other race
- American Indian and Alaska Native
- Black or African American

Race and ethnicity for the City is summarized as follows:

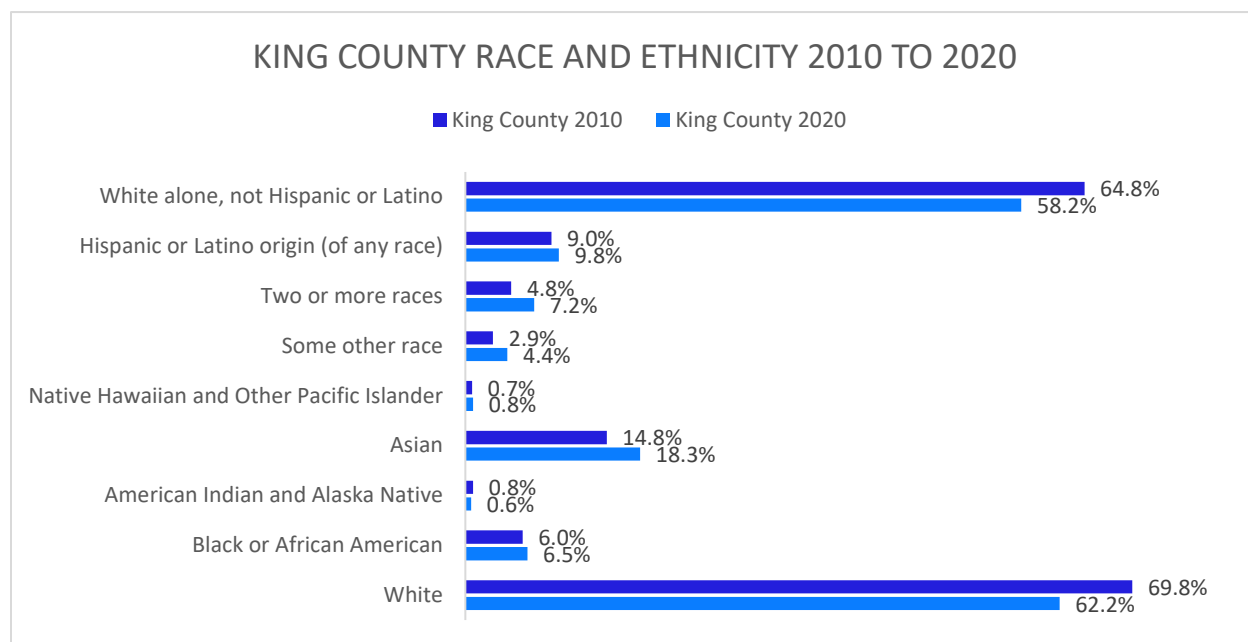
- The City is significantly less diverse than King County as whole.
- Race or ethnic groups identifying as non-white have increased over the last decade.
- The City has a higher proportion of Hispanic and Latino population than King County.

**Figure 2-4. Race and Ethnicity Comparison: Enumclaw and King County**



Source: ACSTable S0601 for Enumclaw City and King County in 2010 and 2020 (USCB n.d).

Figure 2-5. Race and Ethnicity Change 2010 through 2020: King County



Source: ACSTable S0601 for King County in 2010 and 2020 (USCB n.d).

## 2.2.5 Income and Poverty Status

Income and poverty status provide information about the types of housing necessary to meet the needs of the community and whether housing is affordable to all households. Households with lower incomes cannot typically afford to purchase or rent single-family homes, so income is an indicator of how much middle housing might be needed to meet the community need.

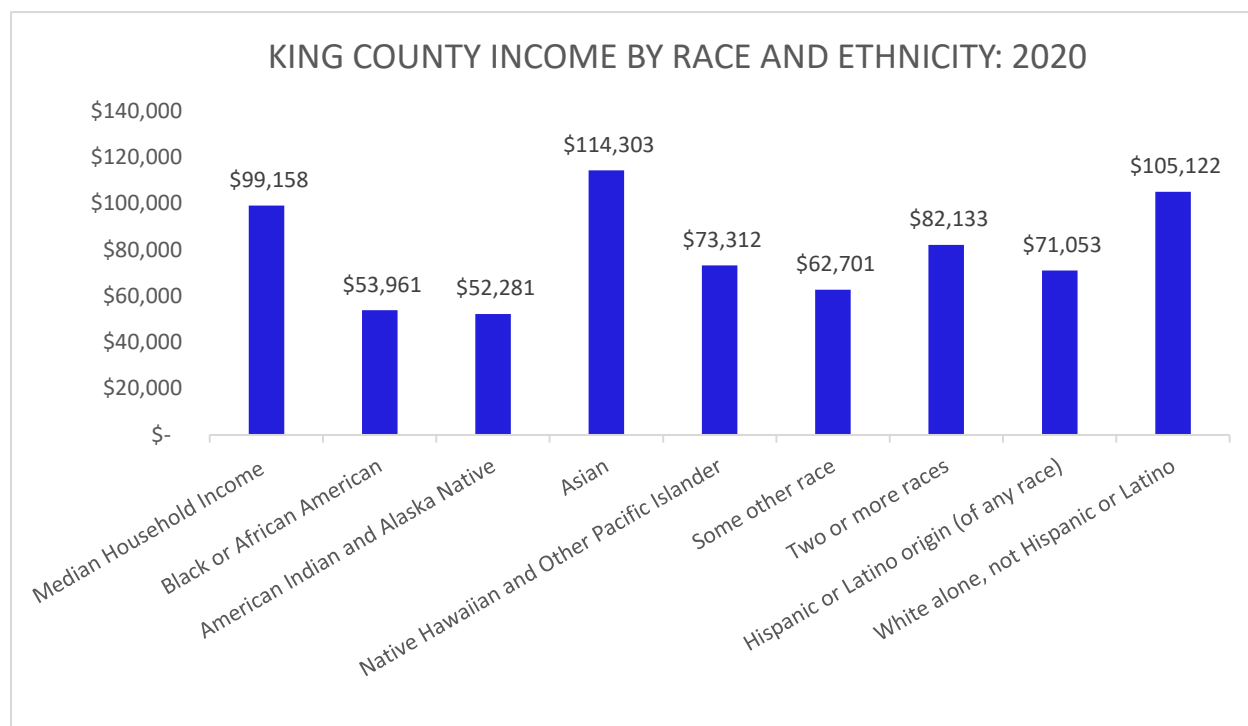
MHI in the City is slightly lower than King County as a whole. The 2021 median income in the City was \$91,855 as compared with \$99,855 for King County (Table 2-1 and Figure 2-6; USCB n.d.).

Table 2-1. 2021 Median Household Incomes by Tenure

2021 Median Household Income	Total	Owner	Renter
King County	\$99,158	\$128,737	\$67,990
Enumclaw	\$91,855	\$103,036	\$52,622

Source: ACSTable B25119 for Pierce County, King County, and Enumclaw City in 2020 (USCB n.d).

Figure 2-6. Income by Race and Ethnicity, 2020, King County



Source: ACSTable S1903 (USCB n.d.).

Households of color in King County receive significantly lower incomes than white households (Figure 2-6). The gap in income based on race or ethnicity is the “racial wealth gap.” In King County, the 2020 MHI for white households was \$105,122, and, for households of color (not including Asian American households), it ranges from \$52,281 (53 percent of MHI) for American Indian and Alaska Native households to \$82,133 (83 percent of MHI) for households with two or more races (Figure 2-6). Income by race or ethnic group is not reported in the City due to the small size of the population, so King County percentages are used to evaluate income by race or ethnicity.

The 2021 MHI in the City was \$91,855 (Table 2-1), so the MHI for households of color can be extrapolated based on King County data. MHI for households of color (except Asian households) likely ranges from \$48,683 to \$76,240. Hispanic or Latino household income is likely approximately \$66,136. GMA defines the MHI income range for households of color as low-income households.

Poverty rates in the City are higher for people of color than they are for the white community (Figure 2-7 and Figure 2-8). The poverty rate for the white community is 7.8 percent, whereas the poverty status of Hispanic and Latino population is 12.9 percent, Asian populations is 10.8 percent, and Black or African American population is 20.5 percent.

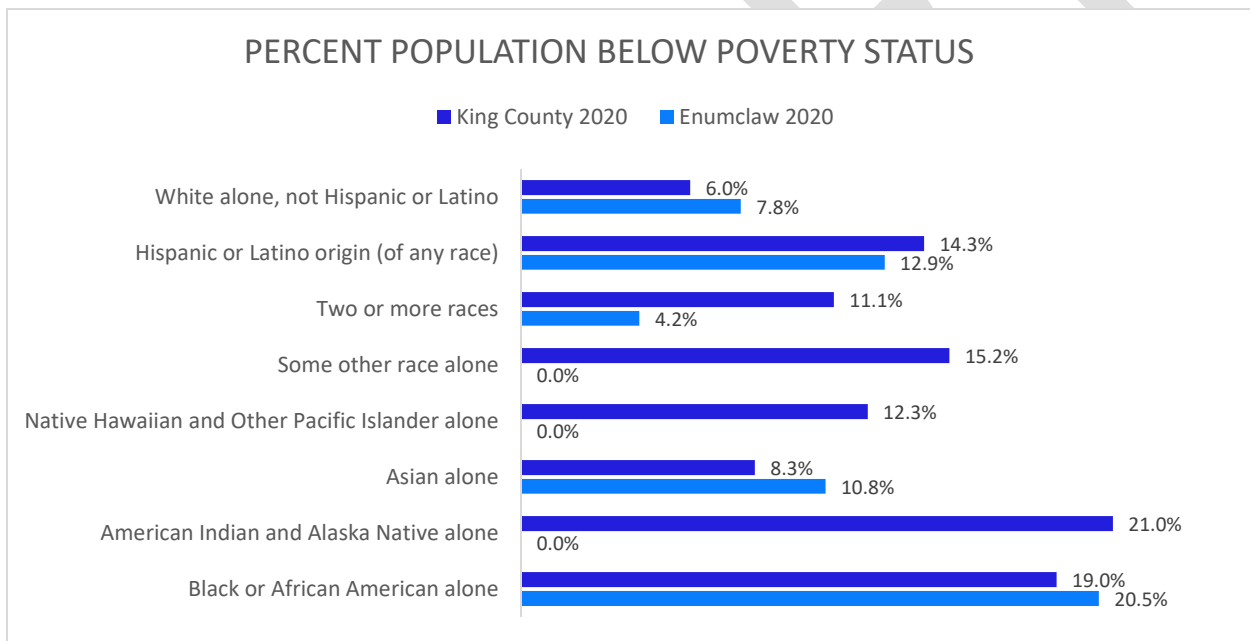
Residents over the age of 65 have lower incomes and higher poverty rates in the City than in King County (Figure 2-9). The MHI for City households over the age of 65 is \$42,500, whereas in King County it is \$60,276 (Table S1903; USCB n.d.). GMA defines households with this income as low-income households because they receive less than 80 percent of MHI for the City.

Overall, poverty conditions in the City are improving; however, poverty rates are still higher than in King County. Poverty rates decreased for white, Hispanic or Latino, and Black or African American households between 2012 and 2020 (Figure 2-8).

Income and poverty status for the City are summarized as follows:

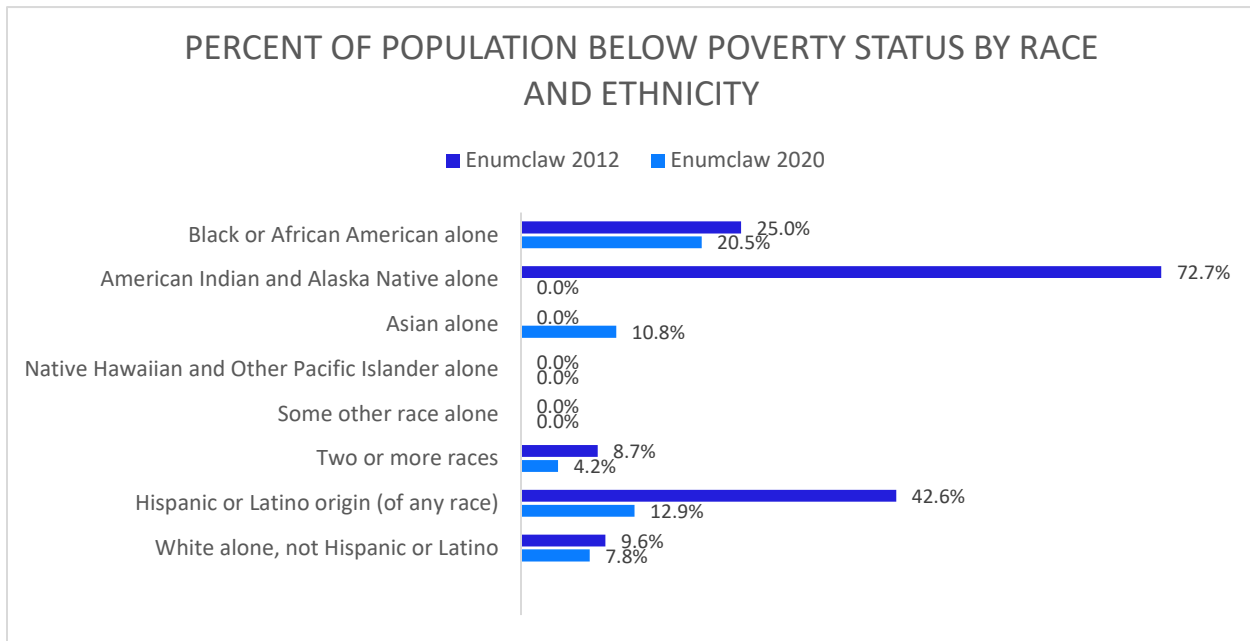
- Incomes increased in the City from 2010 to 2021, but the City’s MHIs are lower than the MHIs in King County.
- Renters have significantly lower incomes than homeowners.
- Households of color in the City likely receive lower incomes than white households.
- Based on MHI, most households of color are likely considered low-income households by GMA.
- Based on MHI, most households over the age of 65 are likely considered low-income households by GMA.
- People of color have higher rates of poverty. Poverty rates by race and ethnicity in the City are as follows:
  - Less than 1 out of every 10 white persons lives below the poverty level.
  - 1.3 of every 10 Hispanic and Latino persons live below poverty status.
  - 1 of every 10 Asian persons lives below poverty status.
  - 2 of every 10 Black and African American persons live below poverty status.
- Poverty rates for those over the age of 65 are higher in the City than in King County.

**Figure 2-7. Poverty Status by Race and Ethnicity Comparison: Enumclaw and King County**



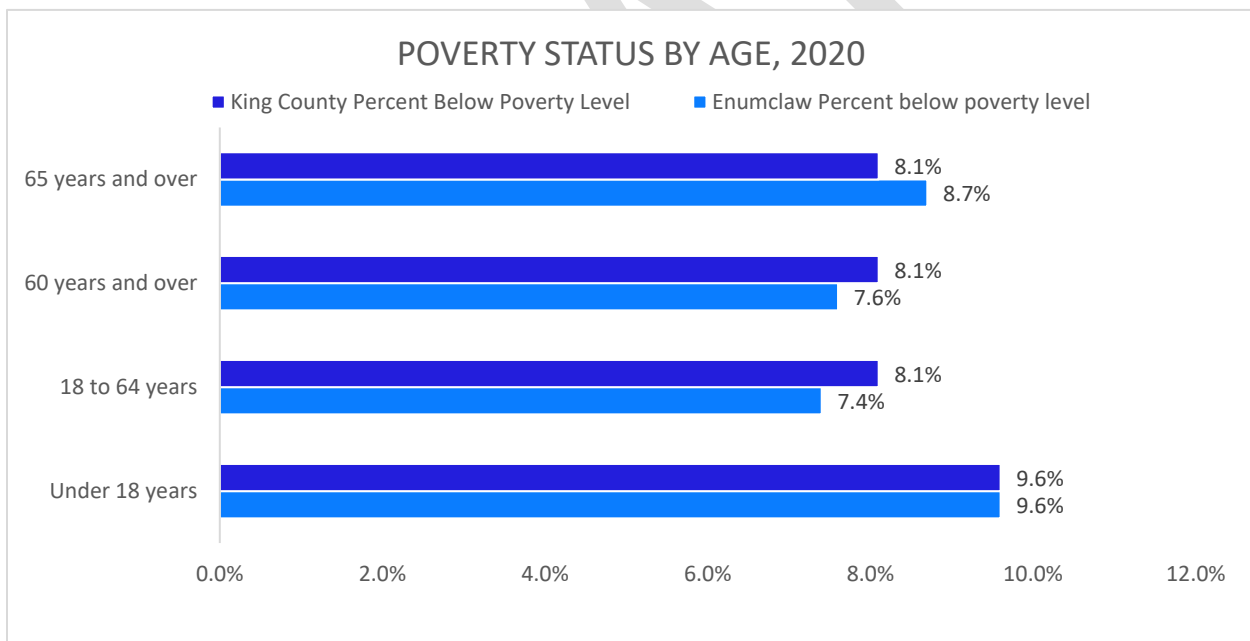
Source: ACS Table S1701 for Enumclaw City and King County in 2020 (USCB n.d.).

Figure 2-8. Change in Poverty Status by Race and Ethnicity, 2012 to 2020



Source: ACSTable S1701 for Enumclaw City in 2012 and 2020 (USCB n.d.)

Figure 2-9. Poverty Status by Age Comparison: Enumclaw and King County



Source: ACSTable S1701 for Enumclaw City and ACSTable S1101 for King County in 2020 (USCB n.d.)

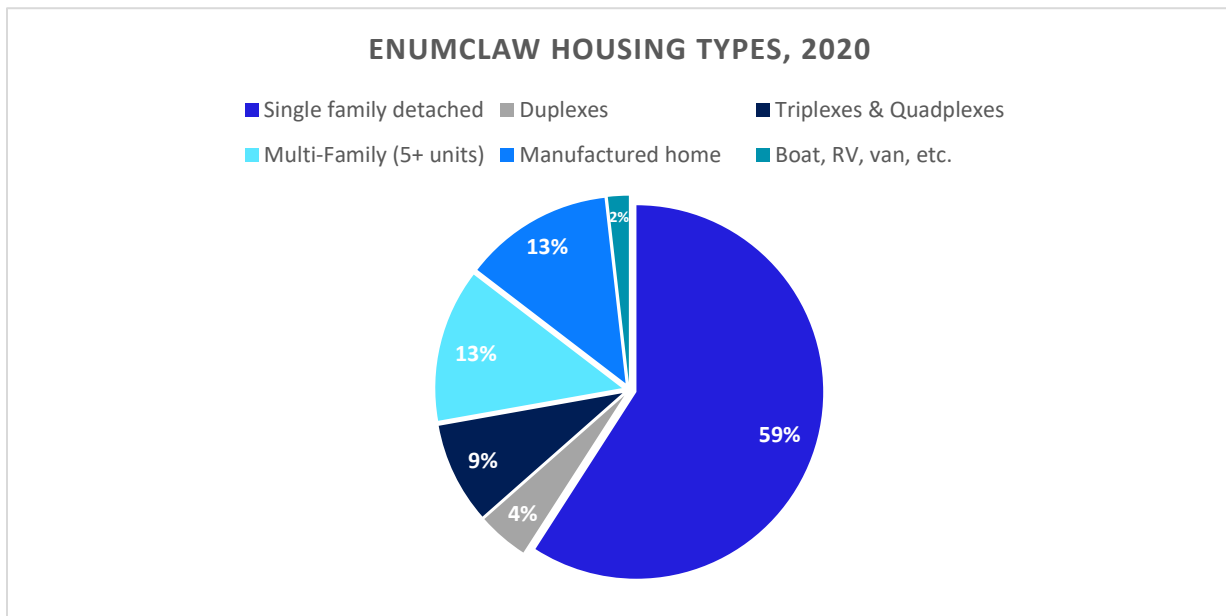
## 2.3 Housing Characteristics

Housing characteristics, including housing types, vacancy rates, housing tenure, and subsidized and affordable housing, provide indicators of disparate impacts in housing based on race or ethnicity.

### 2.3.1 Housing Types and Composition

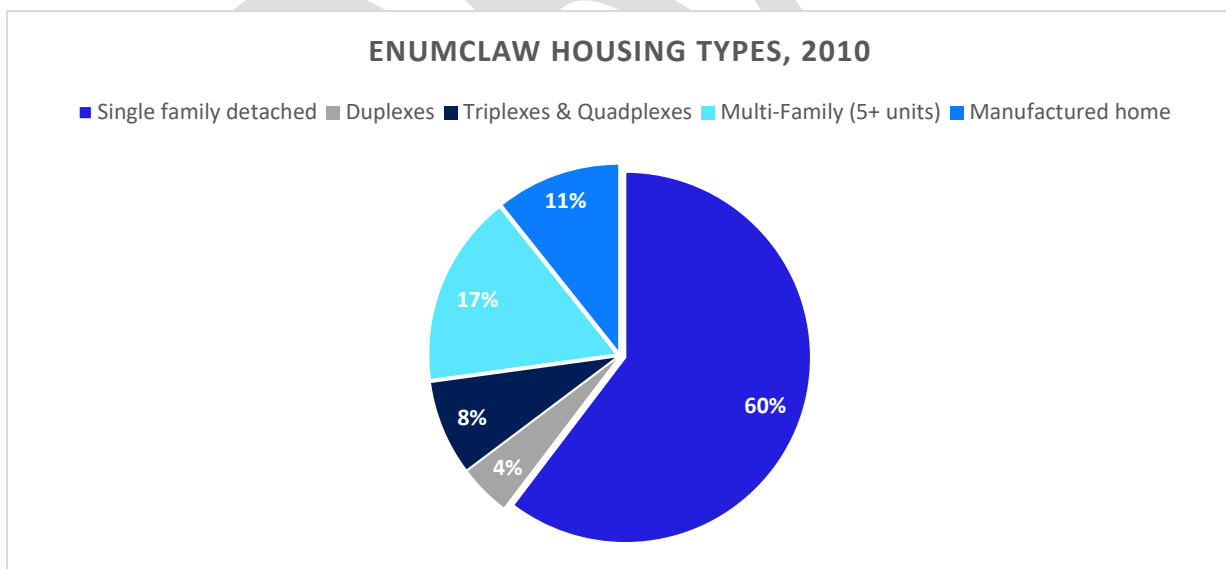
As of 2020, there were approximately 5,125 housing units in the City. The housing stock is predominately single-family detached units (59 percent) (Figure 2-10). The other 41 percent of housing is evenly distributed between multi-family, manufactured homes, and triplexes and quadplexes (Figure 2-10). Middle housing makes up approximately 13 percent of the housing stock. The distribution of housing types did not change significantly between 2010 and 2020 (Figures 2-10 and 2-11). Housing units that are in attached units, duplexes, triplexes, and other middle housing types are almost entirely renter occupied. Only 9 percent of single-family detached homes are renter occupied (Figure 2-12).

**Figure 2-10. Enumclaw Housing by Type, 2020**



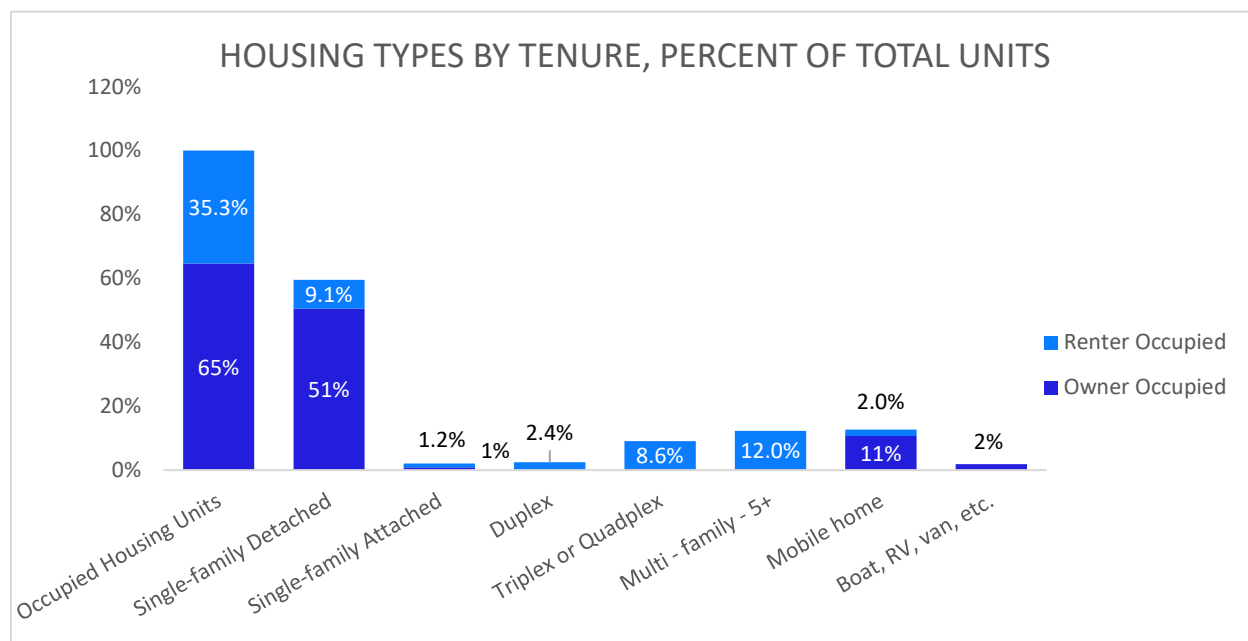
Source: ACSTable S2504 for Enumclaw City in 2010 (USCB n.d.).

**Figure 2-11. Enumclaw Housing by Type, 2010**



Source: ACSTable S2504 for Enumclaw City in 2020 (USCB n.d.).

**Figure 2-12. Tenure by Housing Type 2020, Enumclaw, WA**



Source: ACSTable B25032 for Enumclaw City in 2020 (USCB n.d).

### 2.3.2 Vacancy Rates

Vacancy rates indicate whether there is sufficient supply of housing available for the community. Vacancy rates below 5 percent indicate that there is insufficient supply of housing. The City’s vacancy rate in 2020 was 3.5 percent, which indicates that there is insufficient supply of housing in the community (USCB 2020).

### 2.3.3 Housing Tenure

Occupied housing units are characterized as being renter occupied or owner occupied. Understanding tenure today helps to determine how housing will be needed for owner-occupied and renter-occupied units in the future and whether there are disparate impacts in housing based on race or ethnicity. In the City, 65 percent of homes are owner occupied and 35 percent are renter occupied (Figure 2-13). The homeownership rates in the City are higher overall than in King County.

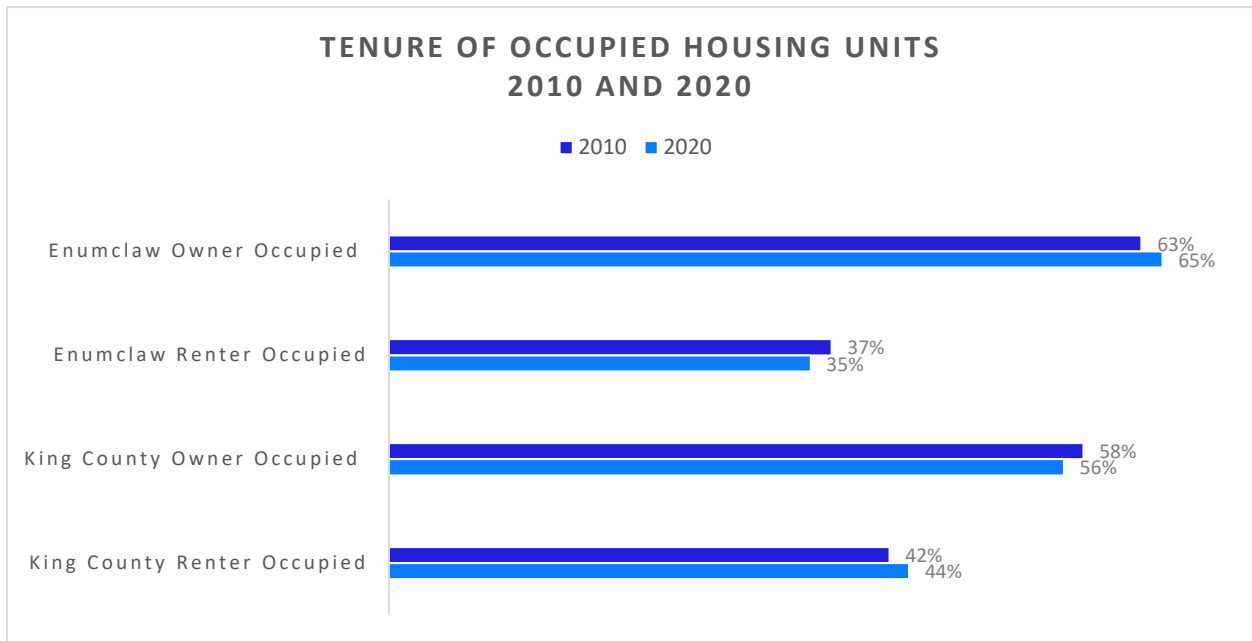
Rental units as a percentage of total housing units decreased by 2 percent between 2010 and 2020. This could be due to construction of more ownership-occupied units relative to rental units or a decrease in the number of units available for rental.

Households of color are less likely to be homeowners than white households; however, homeownership rates for households of color are higher in the City than in King County (Figure 2-14 and Figure 2-15).

Housing tenure for the City is summarized as follows:

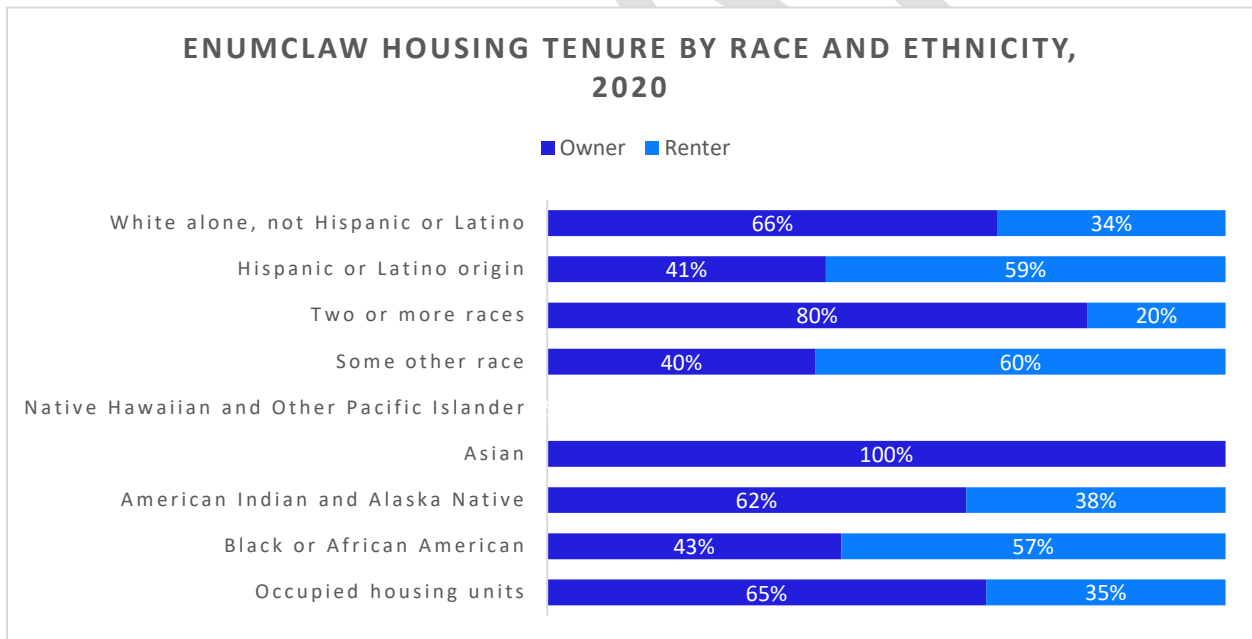
- Homeownership rates for most households in the City are higher than in King County.
- Nearly 7 out of 10 white households in the City own homes.
- Approximately 4 out of 10 Black or African American or Hispanic or Latino households in the City own homes.

Figure 2-13. Change in Tenure of Occupied Housing Units, 2010 and 2020



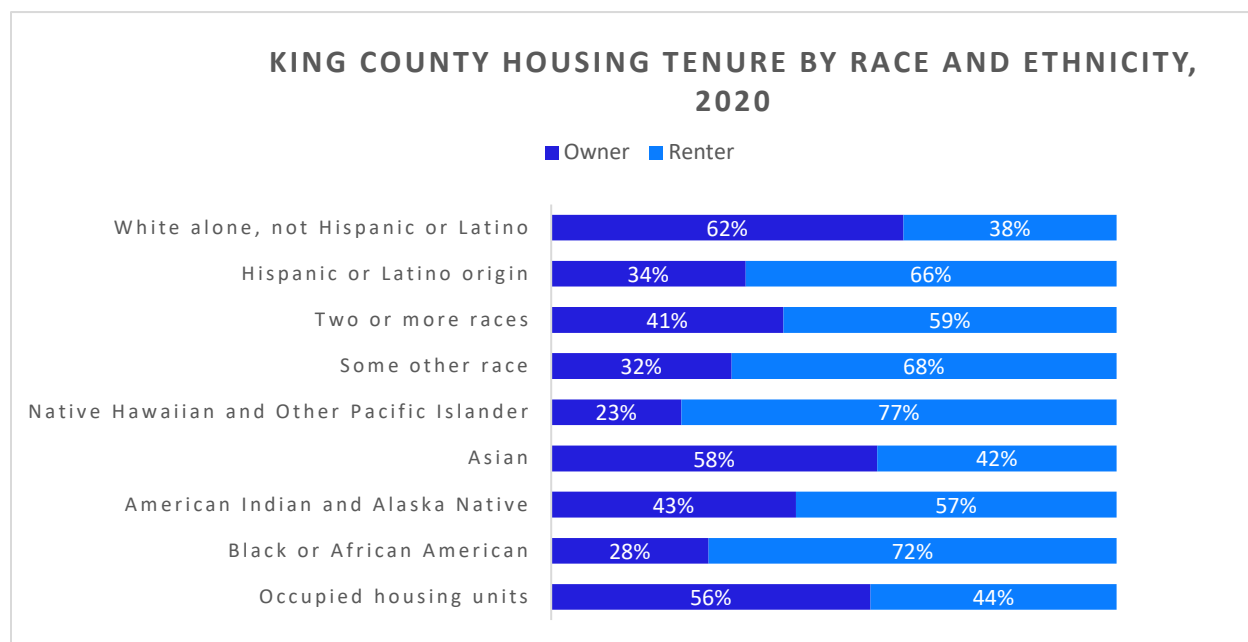
Source: ACSTable 2502 for Enumclaw City and King County in 2010 and 2020 (USCB n.d.).

Figure 2-14. Tenure by Race and Ethnicity



Source: ACSTable 2502 for Enumclaw City in 2020 (USCB n.d.).

Figure 2-15. Housing Tenure by Race and Ethnicity in King County



Source: ACSTable 2502 for King County in 2020 (USCB n.d).

### 2.3.4 Subsidized Housing

In the City, there are two forms of housing assistance available to low-income households making 80 percent or less of the area median income: publicly owned subsidized housing and the U.S. Department of Housing and Urban Development (HUD) Housing Choice Voucher Program. The King County Housing Authority operates both of these programs.

King County Housing Authority owns and operates two affordable rental housing complexes in the City near the intersection of Warner and Semanski. Rainier View I consists of 48 two-bedroom units for families, people 55 years of age and older, and people with disabilities. Rainier View II consists of 36 one-bedroom units for people 62 years of age and older and people with disabilities. These units make up about 1.64 percent of housing units in the City.

The Housing Choice Voucher Program allows low-income households to rent on the private market by providing subsidy of the difference between what the household can afford and the market rate.

Demand for housing assistance exceeds available units and funding, so there is a waiting list. The King County Housing Authority holds a lottery to place applicants on a waiting list. The current waiting was closed in March 2020, and King County Housing Authority does not know when the waiting list will reopen (King County Housing Authority 2023).

There are no known developments with affordable covenants or restrictions within the City and, thus, no expiring affordable covenants.

### 2.3.5 Housing Affordability

Housing affordability encompasses evaluating the number of cost-burdened households, the availability of affordable rent, and how many residents can afford home prices. An increase to rents and home prices significantly can have a significant impact to a large portion of the City’s residents.

### 2.3.5.1 Cost-burdened Households

The number of cost-burdened households is a measure of how affordable housing is in a community because it indicates the number of households who are paying more for housing than they can afford. This section uses the household area median family income (HAMFI), published by HUD, rather than MHI, because it is usually what measures housing cost burden. HAMFI is not the same as the MHI reported by ACS. HAMFI is calculated for the larger metropolitan area and not at the City level.

In 2021, the HAMFI for King County was \$115,700, and the MHI was \$103,793. In comparison, MHI in the City reported by ACS Table S1903 for 2020 was \$91,855 (USCB n.d.).

The City's households are similarly cost burdened as compared with King County as a whole (Figure 2-16). Approximately 32 percent of households in the City and King County are cost burdened (USCB 2021), meaning they pay more than 30 percent of their income for housing. There are approximately 1,550 cost-burdened households in the City.

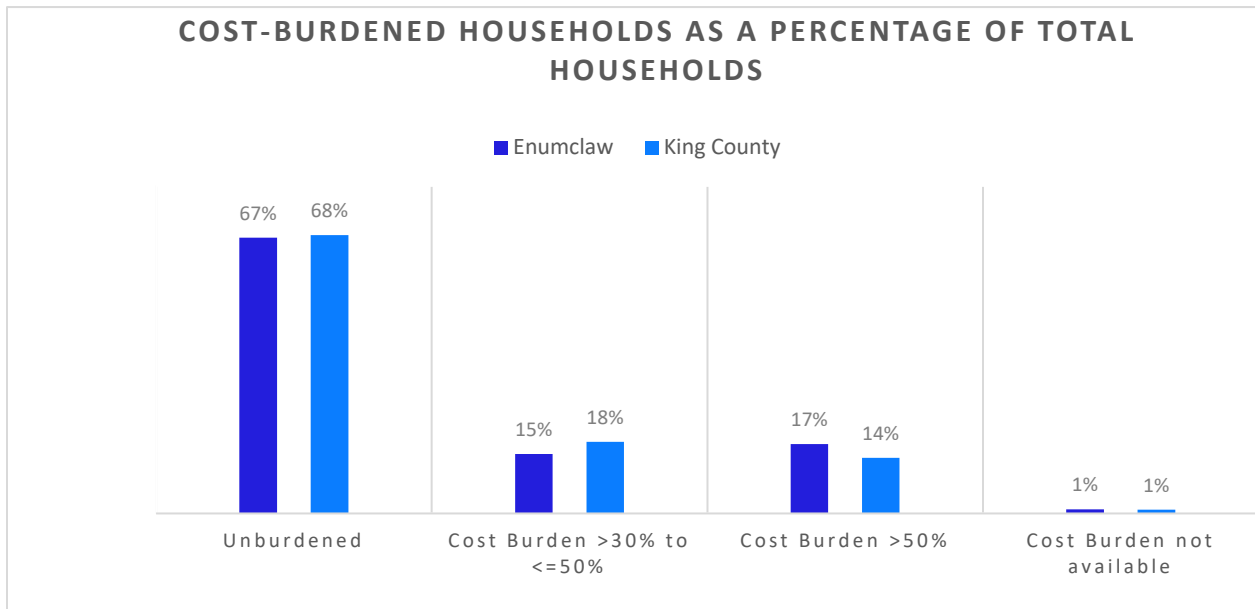
Housing affordability most acutely impacts renters (Figure 2-17) and low-income households (Figure 18 and Figure 2-19) in the City. Nearly all of the cost-burdened households in the City are low-income households (low-income households are defined as those making 80 percent or less of the HAMFI). More than 40 percent of all renters are cost burdened (Figure 2-18). Most households of residents over the age of 65, vulnerable people, and color are low-income households (Sections 2.2.2, 2.2.3, and 2.2.4, respectively).

Households with the lowest incomes are the most severely cost burdened. Figures 2-18 and 2-19 show cost-burdened and severely cost-burdened households by income level for renters and homeowners. Figure 2-20 shows the number of City households by HAMFI income category for renters and homeowners.

Cost-burdened household analysis for the City is summarized as follows:

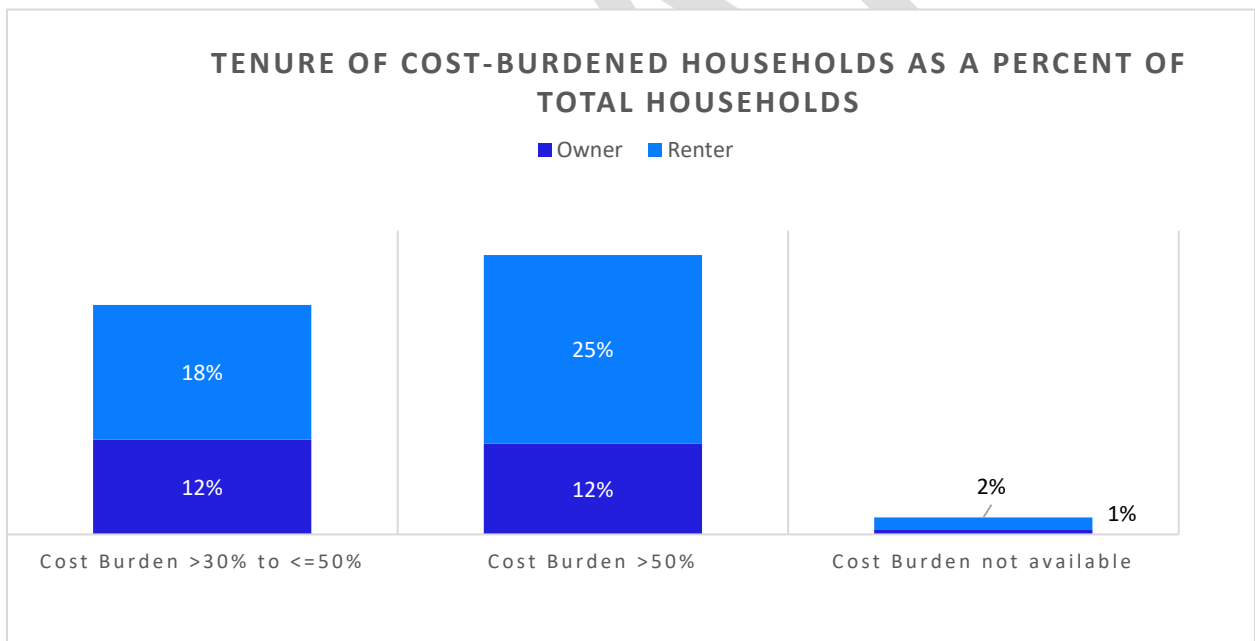
- Housing affordability is a challenge for 32 percent of the City's households, which is approximately 1,550 households:
  - Three in 10 City households are cost burdened.
  - Four in 10 renters are cost burdened.
- Housing affordability most acutely impacts the City's low-income households, including households of color, vulnerable populations, residents over the age of 65, and renters.

Figure 2-16. Comparison of Cost-burdened Households: Enumclaw and King County



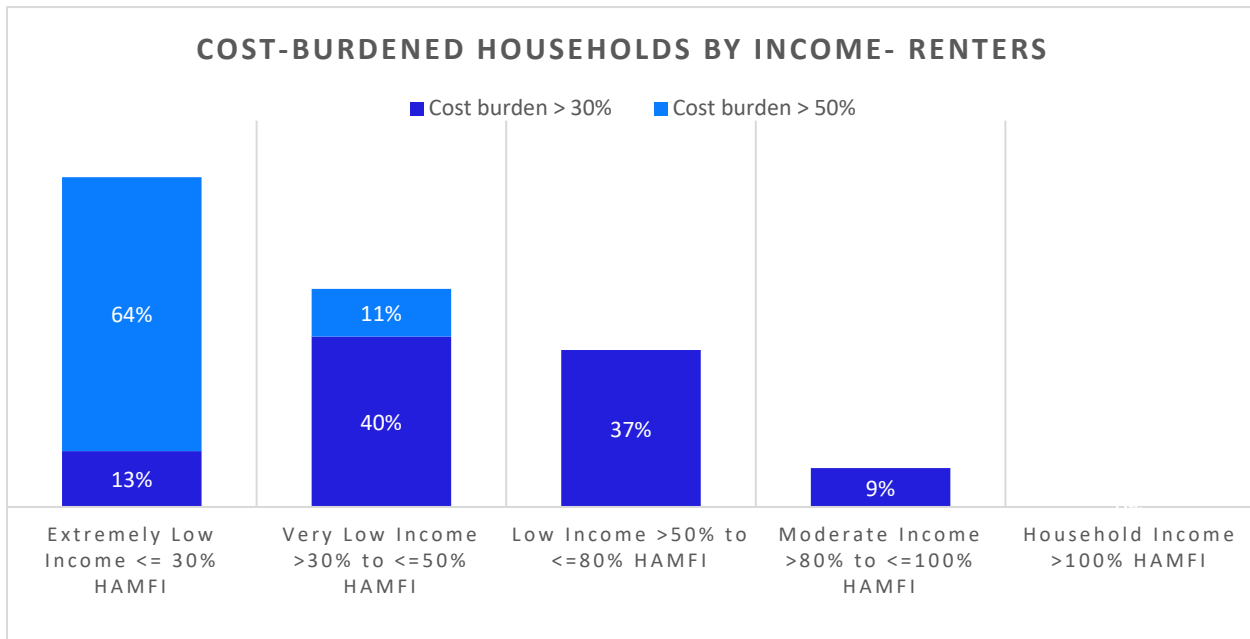
Source: HUD User 2022.

Figure 2-17. Cost-burdened Households by Tenure, Enumclaw



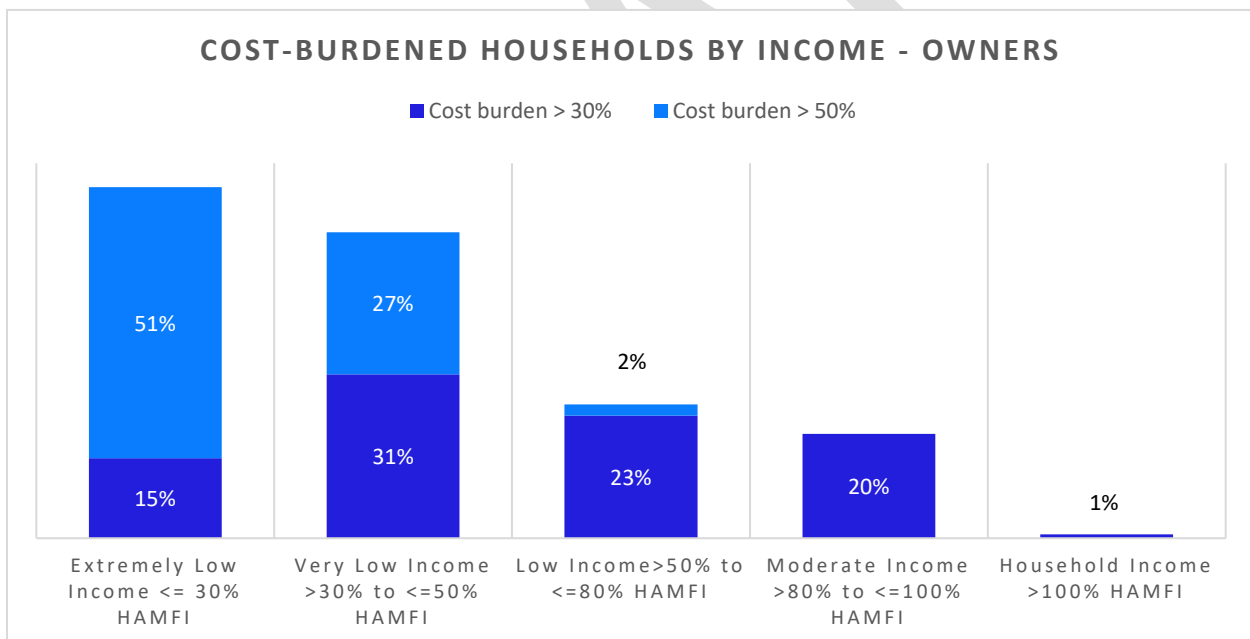
Source: HUD User 2022.

Figure 2-18. Cost-burdened Households by Income for Renters



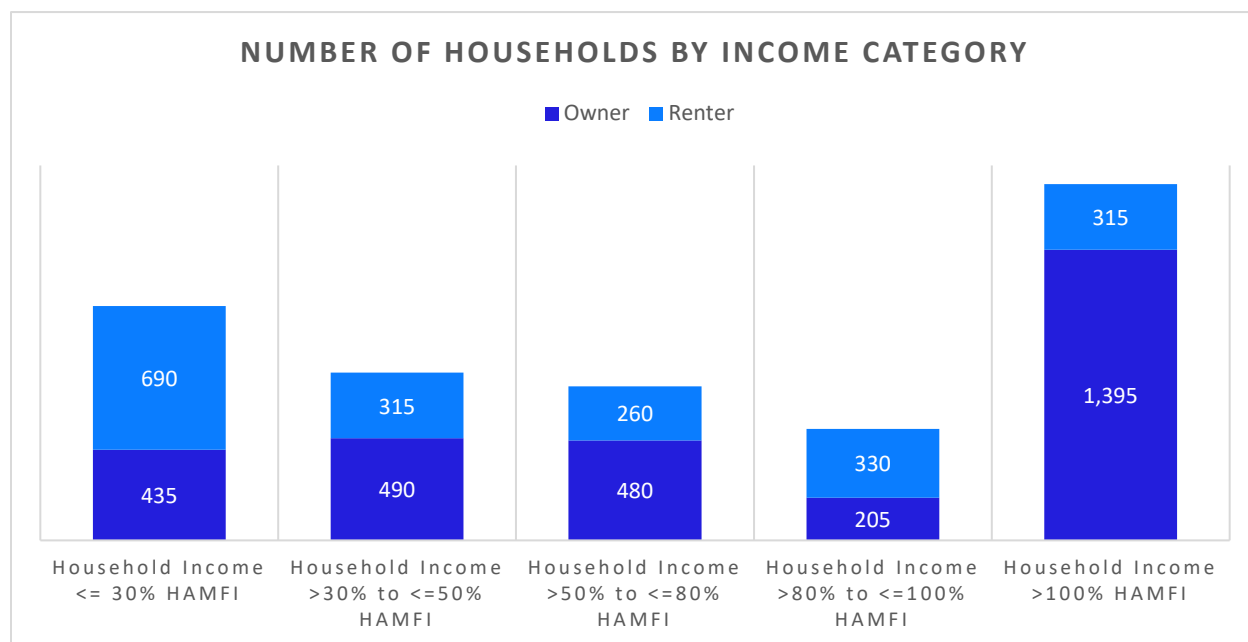
Source: HUD User 2022.

Figure 2-19. Cost-burdened Households by Income for Homeowners



Source: HUD User 2022.

Figure 2-20. Enumclaw Households by HAMFI Income Category



Source: HUD User 2022.

### 2.3.5.2 Affordable Rent

Monthly rent is affordable to renters in one census tract (Census Tract 313.02) in the City. Renters in City had an MHI of \$52,622 in 2021. Monthly rent is affordable if it is less than 30 percent of a renter’s income. The average monthly rent that is affordable to renters is \$1,315 per month<sup>2</sup>. For the three primary City census tracts, gross rent reported by ACS (2021) ranged from \$1,137 (Census Tract 313.02), to \$1,381 (Census Tract 314), to \$1,811 (Census Tract 315.02). Gross rent is the contract rent plus average monthly cost of utilities and fuels, if paid by the renter).

Although the census data indicates the amount of money that residents were paying for rent at the time of the census, market rents in King County have increased significantly in the last few years. HUD fair market rent (FMR) for the City’s zip code (98022) in 2023 ranges from \$1,829 to \$3,446, which is significantly higher than reported gross rent (Table 2-2). This indicates market pressure for increasing rents.

The annual household income necessary to rent an efficiency apartment at fair market value is \$73,160<sup>3</sup>. HUD FMR is not affordable for the approximately 40 percent of City households with incomes less than \$73,160 (Table A-1, Appendix A). It is also not affordable for renters who have a median income of just \$52,622 (Table 2-1).

Table 2-2. HUD Fair Market Rents 2020 to 2023

Year	Area	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
2023	98022	\$1,829	\$1,881	\$2,199	\$2,953	\$3,446
2022	98022	\$1,674	\$1,739	\$2,044	\$2,796	\$3,285

<sup>2</sup> Affordable monthly payment = \$56,622 / 12\*0.30

<sup>3</sup> Annual income needed to afford rent of \$1,829 per month = 1829\*12/0.30

## GMA Racially Disparate Impact Report

Year	Area	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
2021	Seattle-Bellevue (King County)	\$1,523	\$1,599	\$1,906	\$2,694	\$3,172
2020	Seattle-Bellevue (King County)	\$1,627	\$1,741	\$2,099	\$2,993	\$3,524

Source: HUD User 2023.

### 2.3.5.3 Home Prices

Housing in the City is less expensive than King County as a whole, but home prices are on the rise (Figure 2-21) and there are few homes available at prices affordable to households with incomes at or greater than the MHI. In 2021, median home value in the City was \$358,000, a little more than half the median home value in King County at \$750,100 (Figure 2-22). The disparity in value is an indicator that prices in the City are likely to rise as people move from more expensive areas of King County.

Home prices are much higher than home values and out of reach for most households with income at or less than the median, including most renters. A home priced at \$381,333 is affordable to households with income at or greater than the MHI of \$91,855 (Table 2-3). However, there are few homes available at an affordable price. In 2021, only 13 homes sold in the City at prices affordable to households with incomes at or greater than MHI (King County 2017). The Zillow home price data indicate an average home price of \$592,930 as of January 31, 2023, an increase of more than 30 percent since November 2018 (Zillow 2023).

Because income affects a household's ability to purchase a home, the lack of available homes for sale at affordable prices is more acute for low-income households, which include most households of color, renters, and over the age of 65. In King County, households of color make only 52 percent to 83 percent of the MHI; homes affordable at 100 percent of MHI are not affordable to households within this range of MHI (Section 2.2.4).

**Table 2-3. Affordable Monthly Payments Based on Median Household Income: 2010 through 2021**

Year	2010	2015	2019	2020	2021
MHI	\$ 56,494	\$ 54,325	\$ 61,010	\$ 78,750	\$ 91,855
Affordable Monthly Payment ≤ 30%	\$ 1,262	\$ 1,208	\$ 1,375	\$ 1,819	\$ 2,146
Affordable Mortgage for 100% MHI <sup>a</sup>	\$ 249,200	\$ 238,500	\$ 271,500	\$ 290,900	\$ 343,200
Affordable Home Purchase Price	\$ 276,889	\$ 265,000	\$ 301,667	\$ 323,222	\$ 381,333
Number of Homes Sold Affordable to 100% MHI					13
Assumed Interest Rate	4.5	4.5	4.5	6.4	6.4

Source: ACS Table S1901 for Enumclaw City in 2015 and 2020 and King County in 2021 (USCB n.d.).

<sup>a</sup> 6.4% fixed interest rate and 10% down payment on a 30-year mortgage minus \$150 for utilities; does not include property taxes or insurance

≤ less than or equal to

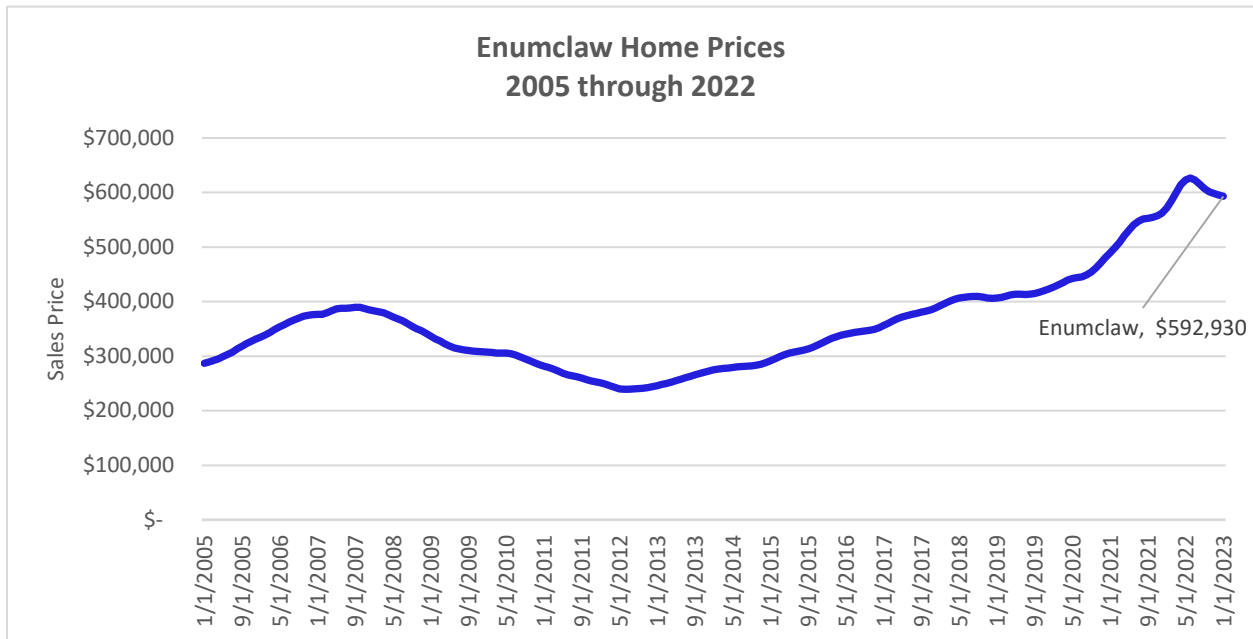
Housing affordability for the City is summarized as follows:

- Home prices and rents have increased significantly in the last decade and are not affordable to a significant portion of the City's residents:
- Approximately 40 percent of households in the City have income of less than \$76,160 and cannot afford to pay FMR for housing (households are categorized by income in Table A-1, Appendix A).

## GMA Racially Disparate Impact Report

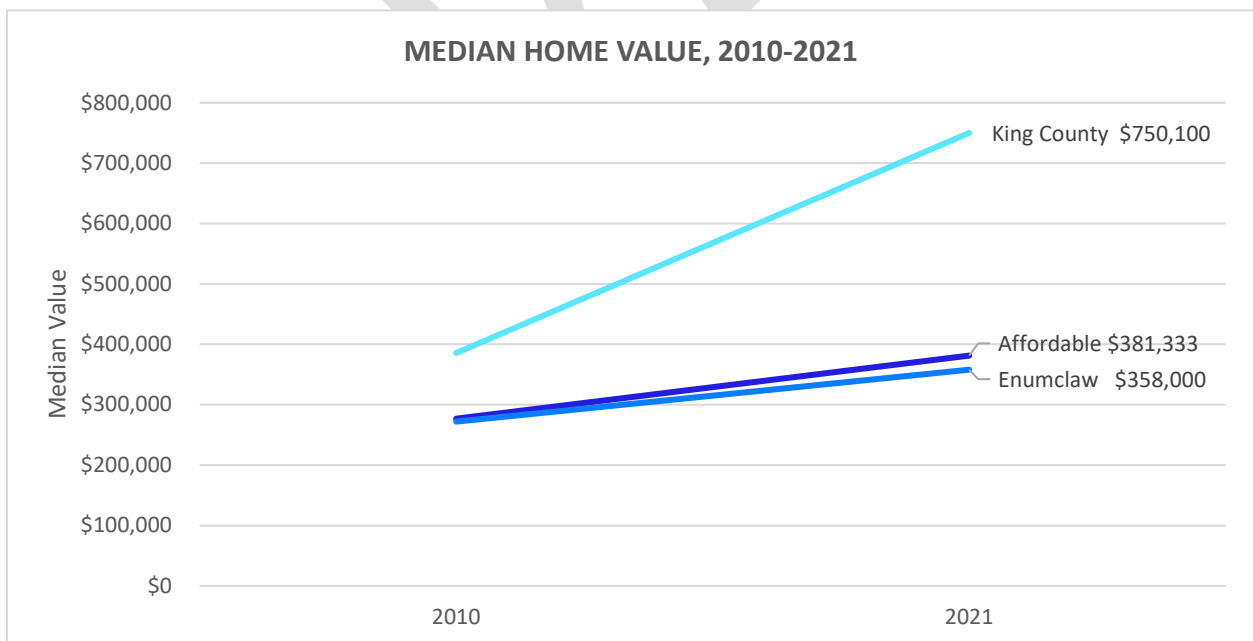
- Fifty percent of City households make less than \$91,955 and cannot afford to purchase a median valued home in the City.
- There are few homes available at prices affordable toMHIs.

**Figure 2-21. Change in Enumclaw Home Prices, 2005 through 2022**



Source: Zillow 2023.

**Figure 2-22. Change in Median Home Value, 2010 through 2021**



Source: ACSTable B25077 for Enumclaw City and King County in 2010 and 2020 (USCB n.d.)

## 2.3.6 Land Use, Zoning, and Land Supply

Land use, zoning, and land supply may be contributing to disparate impacts and exclusion with the prevalence of single-family residential zoning with large minimum lot sizes and zoning that limits the most affordable housing types such as duplexes and triplexes to a few areas in the City.

### 2.3.6.1 Land Use and Zoning Designations

The City has five zones designated primarily for residential housing: R-1, R-2, R-3, R-4, and Residential Manufactured Home Park (RMHP). The majority of the City is designated and zoned R-1 and R-2 by the City of Enumclaw Future Land Use Map (Appendix B) and City of Enumclaw Zoning Map (Appendix C). The uses allowed pursuant to *Enumclaw Municipal Code* (EMC) 18.05.020, Residential land use matrix, and EMC 18.06.030, Densities and Dimensions, are provided in Appendices D and E, respectively, and are summarized as follows:

- R-1 – R-1 is low-density, single-family residential (SFR) zoning with a minimum lot size of 18,000 square feet. R-1 zoning allows only cottage housing, single-family dwellings, and accessory dwelling units as permitted uses. Duplexes, triplexes, and multi-family housing are not permitted.
- R-2 – R-2 is moderate-density SFR zoning with a minimum lot size of 8,400 square feet. R-2 zoning allows cottage housing, single-family dwelling, and accessory dwelling units as permitted uses. Duplexes are allowed as a conditional use.
- R-3 – R-3 is mixed residential. R-3 zoning allows single-family residences, duplexes, and cottage housing. Triplexes and multi-family residential are not permitted.
- R-4 – R-4 is multi-family residential. R-4 zoning allows duplexes, triplexes, multi-family, and cottage housing.
- RMHP – RMHP zoning allows placement of manufactured homes within a mobile home park.

This pattern of single-family zoning likely results in exclusion because most of the City is zoned R-1 and R-2, which require single-family development on large lots and limit more affordable housing types such as duplexes.

### 2.3.6.2 Available Land Supply

King County periodically assesses development capacity for future housing and employment at the county and City levels. This assessment evaluates whether King County's and cities' comprehensive plans and regulations are meeting the housing and employment targets established in the King County Countywide Planning Policies (King County 2021a). Under GMA, King County and the cities are required to designate sufficient land suitable to accommodate these housing and employment targets. If King County or cities do not have sufficient land to meet the targets, they are required to take reasonable measures to increase capacity to meet the targets.

The most recent results of this assessment are published in the *King County Urban Growth Capacity Report* (King County 2021b). The report summarizes information based on Puget Sound Regional Council (PSRC) regional geographies for metropolitan cities, core cities, larger cities, small cities, urban unincorporated, regional growth centers, and manufacturing industrial centers. The City is a small city under this organization.

The analysis calculated achieved densities and the supply of vacant, redevelopable and underdeveloped land using permit data collected between 2012 and 2018 and a snapshot of King County Assessor from January 2019. The additional employment and housing capacity allowed by zoning and development regulations for each city was estimated based on development trends and available land supply. Developments in the pipeline (permitted but not built) as of 2018 were accounted for in the capacity analysis.

King County’s capacity analysis shows that the City has capacity for 1,308 housing units, which exceeds its 2044 target of 1,057 units, indicating that there is sufficient land supply (King County 2021b). Although this analysis indicates that there is sufficient supply for the housing target, it does not indicate whether the supply meets the requirement of RCW 36.70A.070(2)(c) by identifying sufficient capacity for a variety of housing types including:

housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes (RCW 36.70a.070(2)(e))

The majority of vacant and redevelopable residential land is zoned for SFR uses (Table 2-4). More than 40 percent of the vacant or redevelopable land in the City is zoned R-1 or R-2, which allows primary for SFR dwellings. Only 11.9 percent of vacant or redevelopable land is zoned R-3, R-4, or RMHP, which allows for housing types affordable to low, very low, and extremely low-income households, such as multi-family, duplexes, and manufactured home parks (Table 2-4).

**Table 2-4. Vacant and Redevelopable Land**

Zone	Vacant and Redevelopable Land Supply (Acres)	Percent of Total
Total Non-residential and Mixed Use	354.0	43.4%
Total Planned Unit Development	7.5	0.9%
Total R-1	40.8	5.0%
Total R-2	308.4	37.8%
Total R-3	12.7	1.6%
Total R-4	35.7	4.4%
RMHP	55.9	6.9%

Source: King County, 2021b.

## 3. *Growth Management Act House Bill 1220 Analysis*

### 3.1 Disparate Impacts

Disparate impacts occur when policies, rules, or other systems result in disproportionate impact on one or more racial groups. Identifying and measuring disparate impacts will help inform recommended changes to policies and regulations that may contribute to disparate impacts, displacement, and exclusion in housing.

#### 3.1.1 Potential Measures of Disparate Impacts

Home ownership or housing tenure, cost burden, environmental hazard exposure, overcrowding, and fair housing violations are possible causes of disparate impacts.

##### 3.1.1.1 Home Ownership or Housing Tenure

Households of color in the City are more likely to be renters and have lower rates of homeownership than white households. Approximately 66 percent of white households are homeowners, whereas homeownership rates for all other races and ethnicities range from 41 percent (Hispanic or Latino) to 62 percent (American Indian or Alaska Native)(Figure 2-14). This indicates that households of color may experience disparate impacts in homeownership in the City.

##### 3.1.1.1.1 Possible causes of disparate impacts in housing tenure

**Regional and systemic root causes:** Because non-white households in the City have higher homeownership rates than in King County, disparate impacts are likely not a result of local policies, but likely from larger regional and systemic causes, such as pay inequity.

**Income disparity :** The majority of households of color in King County and the City have lower incomes than their white counterparts , which makes home ownership more difficult or even impossible.

##### 3.1.1.2 Cost burden

The majority of American Indian and Alaska Native, Black and African American, and Hispanic and Latino households are cost burdened and do not live in housing that is affordable (Figure 3-1). Only 31 percent of white households are cost burdened. This indicates that households of color experience disparate impacts in housing.

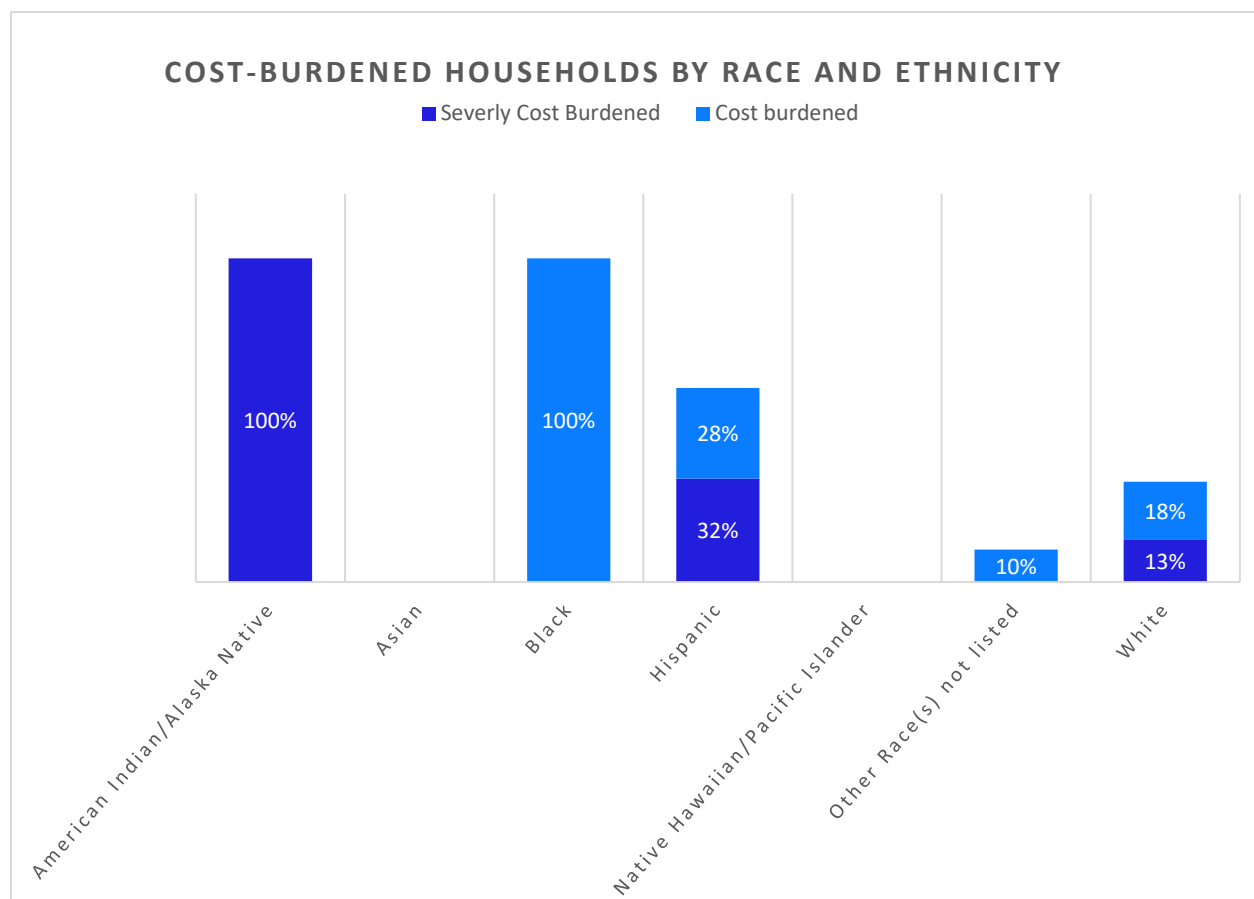
##### 3.1.1.2.1 Possible causes of disparate impacts related to cost burden

**Income disparity :** Households of color do not receive as high an income as white households.

**Lack of housing affordable to households making less than MHI:** The majority of non-white households (except for Asian households) make less than MHI (Figure 2-6). There is not enough housing available that is affordable to these households.

**Zoning or housing policies :** Policies or regulations that exclude less-expensive housing types, such as middle housing, apartments, or manufactured homes, or that promote or require development of single-family homes on large lots likely result in a limited supply of affordable housing.

Figure 3-1. Cost-burdened Households by Race and Ethnicity



Source: King County 2021c.

### 3.1.1.3 Environmental hazard exposure

The Washington environmental health disparity (EHD) map (Washington State Department of Health n.d.) is an interactive mapping tool that compares communities across Washington State for environmental health disparities. The EHD map identifies communities most affected by cumulative impacts of pollution. The EHD map evaluates environmental health indicators and rates for each census tract in the state. Ratings range from 1 to 10, with 10 indicating the highest impact.

Indicators include ozone concentration, diesel emissions, toxic releases from facilities, proximity to heavy traffic roadways, lead risk from housing, proximity to hazardous waste treatment storage and disposal facilities and superfund sites, wastewater discharge, socioeconomic factors, and sensitive populations.

The City is located within four census tracts (Figure 3-2). Several census tracts are ranked 8 and 9 for the following factors:

- Unaffordable housing (Census Tracts 314 and 313.02) (Appendix F)
- Vulnerable populations, including limited English; population 65 year and older living alone; population with a disability; and single-parent households (Census Tracts 314 and 313.02) (Appendix F)
- Social vulnerability to natural hazards (Census Tracts 314, 313.02, and 315.02) (Appendix F)
- Environmental exposures (Census Tract 314) (Appendix F)

There do not appear to be disparate impacts from environmental exposures based on race or ethnicity; however, there are census tracts with high-risk factors for environmental exposures due to toxic releases from facilities, unaffordable housing, and risk to vulnerable populations from natural hazards.

### 3.1.1.4 Overcrowding

More than one occupant per room is an indicator of overcrowding. ACS Tables B25014A through B25014I indicate that approximately 16 percent of the Hispanic or Latino population live in overcrowded conditions in the City (USCB n.d.). There is no other apparent overcrowding by race or ethnicity reported by ACS. The data have large margins of error for the City that make them an unreliable source of information.

### 3.1.1.5 Fair Housing violations

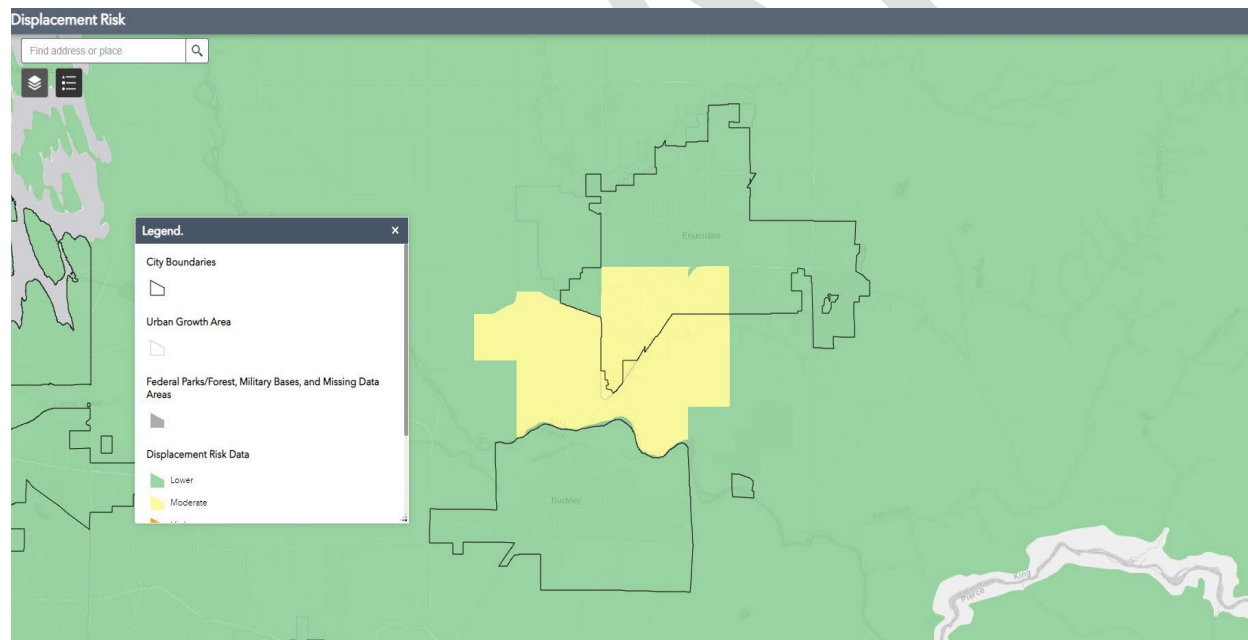
There is no available information about fair housing violations in the City. This is a data gap that will be included as part of the public and stakeholder surveys.

## 3.2 Displacement Risk

Displacement can result from a variety of factors, including the inability to afford rising rents or costs of homeownership; demolition, redevelopment, or rehabilitation of rental housing, or a loss of institutions or people supporting a cultural community.

PSRC publishes a displacement risk map that identifies Census Tract 313.20 as an area of moderate displacement risk (Figure 3-2).

**Figure 3-2. Displacement Risk Map for Enumclaw**



Source: PSRC n.d.

In addition to PSRC there are other indicators of displacement risk (Washington State Department of Commerce 2022). These indicators are based on the draft guidance provided by Washington State Department of Commerce (2022) and include patterns of change, such as increases in evictions, demolition of manufactured homes, expiring affordable housing covenants, and sociodemographic and market indicators.

There appear to be no significant patterns of change that would indicate that displacement is occurring in the City. The number of households of color has not decreased in the last decade, the number of evictions is low (KCBA n.d.), and there are no known expiring affordable housing covenants in the City.

Sociodemographic and market indicators are discussed in the following subsections. The presence of these indicators in a community suggests a higher risk of displacement.

### 3.2.1 Sociodemographic Indicators

Sociodemographic indicators of displacement risk include changes in tenure over time, housing cost burden, and the number of lower-income households (Washington State Department of Commerce 2022).

#### 3.2.1.1 Changes in Tenure

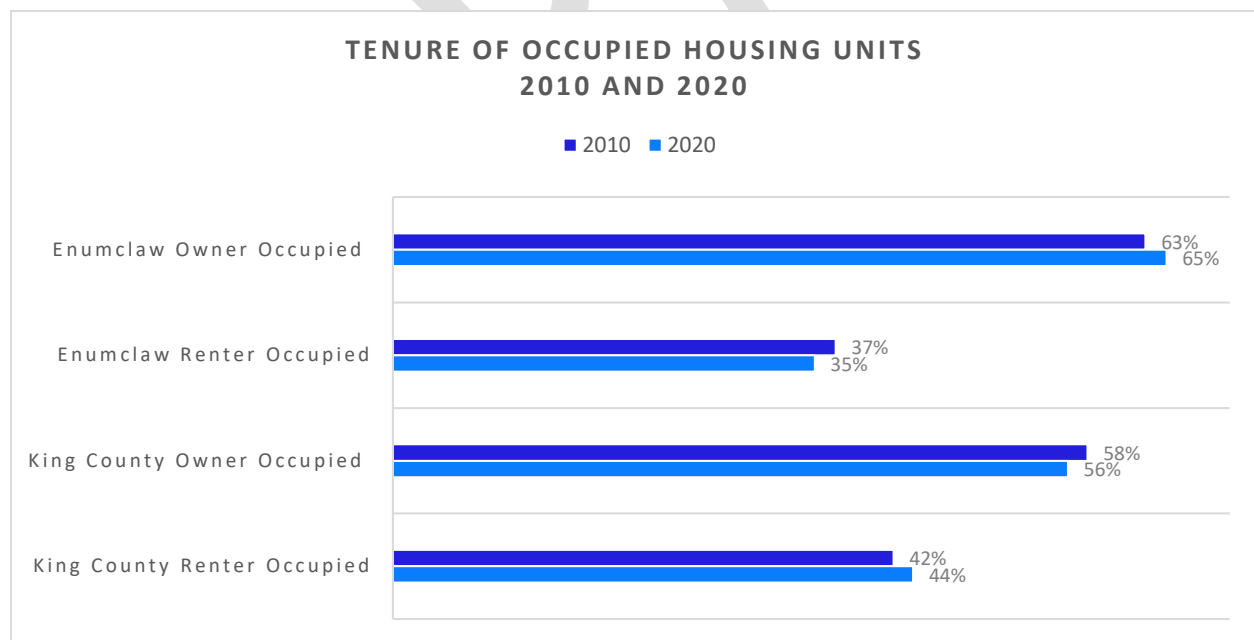
Changes in tenure, such as a reduction in the percent of renter households, may indicate that renters are being displaced as rental housing is converted to ownership housing (Washington State Department of Commerce 2022).

Between 2010 and 2020, the percentage of renter-occupied units declined by 2 percent, and owner-occupied units increased by 2 percent in the City in the same period. King County renter-occupied units increased by 2 percent (Figure 3-3). This change in renter-occupied housing units may be a result of the following:

- Development of new single-family, owner-occupied units may have occurred at a higher rate than new renter-occupied units.
- Renters may have been displaced when single-family housing units that had been rented for economic reasons during the “Great Recession” were sold as market conditions improved between 2012 and 2020.

The changes in tenure do not appear to be a significant indicator of displacement in the City.

**Figure 3-3. Change in Tenure of Occupied Housing Units, 2010 and 2020**



Source: ACSTable 2502 for Enumclaw City and King County in 2010 and 2020 (USCB n.d).

### 3.2.1.2 Housing Cost Burden

A high housing cost burden increases a household's risk of displacement. As more is spent on housing, there is less available for other essentials such as food or transportation. Cost-burdened households may be forced to move due to increases in rent, price of food, or medical care that result in their inability to continue to pay for housing.

Approximately 32 percent of the City's households are cost burdened and at risk of displacement (Figure 2-16). Low-income households and renters are the most vulnerable to displacement. The risk of displacement is higher for households of color in the City because nearly all are cost burdened and at risk of displacement (Figure 3-1).

## 3.2.2 Market Indicators

Market indicators that may result in the displacement of lower - and moderate-income households include raising prices and redevelopable land, loss of locally owned businesses, and Census Tract characteristics.

### 3.2.2.1 Rising prices and redevelopable land

Renters in areas with underutilized development capacity and increasing housing prices are at risk for displacement as properties are sold for redevelopment (which can lead to gentrification). As the supply of affordable housing declines, lower- and moderate-income households are displaced because they are unable to find housing that they can afford.

Based on the City's buildable lands analysis and map, there is not a significant number of properties that are likely to be at risk of displacement. There are one or two properties currently developed with duplexes that are identified as "redevelopable." These properties could be sold for redevelopment and contribute to the displacement risk in the City (Appendix G).

### 3.2.2.2 Displacement risk of locally owned businesses

Commercial land that is redevelopable, based on developable land inventory, has low building-value-to-land-value ratio and may be attractive to developers. The presence of redevelopable land may indicate a displacement risk for locally owned businesses located on the redevelopable land. If the areas of displacement are areas with a significant number of businesses or cultural institutions that support households and communities of color, the loss of these businesses and institutions could result in displacement because households that depend on the businesses or institutions are forced or choose to leave the community.

Based on the City's buildable lands map, there are two areas that are developed with existing businesses that are identified as redevelopable. They are the area between Griffin Avenue and Stevenson Avenue east of First Street, and the area south of Roosevelt/SR 410 and east of Watson Street N. The areas that may be at risk do not appear to have a concentration of businesses or institutions that support households and communities of color (Appendix G).

## 3.2.3 Identification of Areas at Higher Displacement Risk (by Census Tract)

By and large, the census tracts have similar characteristics with the exception of Census Tract 313.02. Census Tract 313.02 is an area of higher displacement risk than the rest of the City. Census Tract 313.02 has a higher percentage of Hispanic or Latin population, higher poverty rate (nearly triple), lower rent, and significantly lower median household income than the other census tracts.

Displacement risks for the City is summarized as follows:

- Approximately 32 percent of the City's households are cost burdened and at risk of displacement. Low-income households and renters are the most vulnerable to displacement.

- There are no significant patterns or trends that indicate that displacement is occurring in the City.
- CensusTract 313.02 is an area of higher displacement risk than the rest of the City. It has a higher percentage of Hispanic or Latino population , higher poverty rate (nearly triple), lower rent , and significantly lower median household income than the other census tracts.

### 3.3 Exclusion in Housing

Exclusion in housing is the act or effect of shuttering or keeping certain populations out of housing within a specified area in a manner that may be intentional or unintentional but that leads to non-inclusive impacts. This can be measured by the presence of an over- or under-represented subgroup, the concentration of affordable housing vouchers in a specific area of the city, and segregation at the Census Tract level.

#### 3.3.1 Measures of Exclusion

Based on the draft guidance from the Washington State Department of Commerce (2022), the following are indicators of exclusion in housing:

- Over- or under-representation of a subgroup
- Concentration of affordable housing vouchers in one area or within the City
- Segregation by race or ethnicity within the City

These measures show whether communities have been excluded by race or ethnicity and provides a starting point for communities to evaluate housing policies that may contribute to exclusion.

##### 3.3.1.1 Over- or under-representation of a subgroup

The City is significantly less diverse than King County as whole, which is an indicator of exclusion in housing. However, race and ethnic groups identifying as non-white have increased over the last decade. Notably, the City has a higher proportion of Hispanic and Latino population than King County (Section 2.2.4). Because there has been an increase in non-white households, conditions are improving. This exclusion may be a result of historical inequities. It may also be a result of zoning and housing policies that resulted in a prevalence of more expensive forms of housing.

Possible causes of exclusion include the following:

- **Limited transit service** : The City's location far from employment centers with limited transit likely makes it a difficult place for households of color to live because they have less access to cars. In King County, 13 percent of households of color do not have access to a car, whereas only 9 percent of white households do not have access to a car. The percentage of Black or African American households without access to a car is even higher at 19 percent (National Equity Access n.d.).
- **Zoning and housing policies** : Zoning and housing policies that require more expensive housing types, such as large-lot SFR development, contribute to exclusion in two ways: (1) households of color who receive lower incomes are excluded because they cannot afford to live in the community, and (2) large-lot development with average densities of less than seven units per acre cannot be efficiently served with public transit and contributes to limited transit service.
- **Regional transportation policies** : Regional policies that focus public transit service and improvements in metropolitan, core, and larger cities may contribute to exclusion in smaller cities.
- **Racial covenants**: Covenants recorded on land subdivisions have historically been used to exclude people of color in other communities. The City does not have a history of discriminatory zoning or plan policies, and no racially discriminatory covenants have been identified. Although an exhaustive search was not conducted, plat conditions on most of the plat in the City were reviewed. In addition, a search of racial covenants through the University of Washington's Racial Restrictive Covenants webpage on

the Seattle Civil Rights & Labor History Project did not produce any Racial Restrictive Covenants in the City (University of Washington n.d.).

### 3.3.1.2 Concentration or Dispersion of Affordable Housing or Housing Choice Voucher Usage

When housing patterns or policies concentrate subsidized housing into a few areas, it may mean that low-income households have reduced access to places of opportunity. There are some indicators that affordable housing is concentrated in Census Tract 313.02. There are two subsidized affordable housing developments in the City, both located in Census Tract 313.02. Census Tract 313.02 also has the most affordable rents in the City (Table A-2, Appendix A).

#### 3.3.1.2.1 Possible causes of concentration

**Housing or zoning policies :** Most of the City's multi-family zoning (R-4) has historically been located in Census Tract 313.02, and other census tracts have mostly been zoned for SFR development.

**Capital facilities needs :** Multi-family zoning on the eastern side of the City near Farman and Roosevelt/ SR 410 require extensions of sewer lines or improvements that may limit development of more affordable housing choices. This area is not within Census Tract 313.02.

### 3.3.1.3 Segregation

Segregation occurs where there are census tracts or neighborhoods with a higher percentage of households of color than the surrounding area or King County as a whole. There does not appear to be a pattern of segregation between City census tracts (Table A-2, Appendix A), although Census Tract 313.02 has a higher percentage of Hispanic or Latino population.

## 4. Policy and Regulation Review

Using framework criteria to identify local policies and regulations that can result in disparate impacts, displacement, and exclusion in housing, all policies in the City's Comprehensive Plan, Comprehensive Sewer Plan, Stormwater Plan and zoning regulations, and utility rate schedules were reviewed.

### 4.1 Framework for Evaluation

GMA requires cities and counties to identify local policies and regulations that result in disparate impacts, displacement, and exclusion in housing, including zoning that may have a discriminatory effect, disinvestment, and infrastructure availability.

The United States has historically used zoning to exclude based on race or ethnicity. The Supreme Court banned the use of explicit race-based zoning in 1917; however, communities continued to segregate and exclude via indirect methods such as the following :

- Rezoning minority communities from residential to industrial or commercial uses resulting in displacement
- Enforcing restrictive land use regulations, such as large minimum lot sizes, that result in higher housing prices that keep poorer families out of wealthier, high-opportunity neighborhoods; significant wealth gap between white families and families of color resulted in exclusion and segregation
- Implementing or constructing parks, green spaces, or infrastructure in predominantly single-family or wealthy neighborhoods, resulting in disparate impacts

The intent of the GMA is to ensure that that these types of past discriminatory policies, regulations, and practices are identified and replaced with policies, regulations, and practices to undo disparate impacts that may have been caused by local policies, plans, or actions. The questions posed in the following subsections were used to evaluate policies, plans, and practices for disparate impacts, exclusion, segregation, and displacement.

#### 4.1.1 Disparate Impacts

- Does the policy or regulation limit housing types or locations based on income, tenure, or race?
- Does the policy or regulation prioritize parks, green spaces, or infrastructure construction in single-family neighborhoods?

#### 4.1.2 Exclusion

- Does the policy or regulation limit most types of housing except for single-family residences?
- Does the policy or regulation support or encourage development of housing for higher-income households?

#### 4.1.3 Segregation

- Does the policy or regulation concentrate or limit higher-density housing or affordable housing to certain geographic areas?

#### 4.1.4 Displacement

- Does the policy or regulation propose to change existing residential neighborhoods from residential to non-residential zoning?
- Does the policy propose replacement of lower-priced housing with higher-priced housing?

- Does the policy or regulation require nonconforming duplexes, triplexes, and multi-family developments in single-family zones to be brought into conformance?

## 4.2 Local Policies and Regulations that May Result in Disparate Impacts, Exclusion, Segregation, or Displacement

All policies in the City’s Comprehensive Plan, Comprehensive Sewer Plan, Stormwater Plan and zoning regulations, and utility rate schedules were reviewed against the previously listed framework questions. Table 4-1 lists the policies, regulations, and fees that may contribute to disparate impacts, exclusion, segregation, or displacement, along with the reason or explanation. Because households of color receive much lower incomes than white households, policies that exclude or result in segregation for lower-income households also are likely to result in racial exclusion or segregation.

**Table 4-1. Local Policies and Regulations that May Contribute to Disparate Impacts, Exclusion, Segregation, or Displacement**

Goal, Policy, or Regulation	Text	Possible Impact	Reason
Goal LU5 Policy 5.4	Allow placement of manufactured homes in existing manufactured home parks or in residential zones that have residential design standards in place to preserve neighborhood character.	Exclusion	Excludes manufactured homes in SFR areas because they are not likely to meet design standards. Manufactured homes are more affordable than stick-built homes, so this policy may exclude households with lower incomes.
Goal LU6:	Encourage the development of upper-middle-income residential neighborhoods that appeal to a variety of age groups.	Exclusion, Displacement	Excludes based on income and may contribute to displacement as affordable housing is replaced with upper-middle-income housing (gentrification).
Goal T-4 Policy 4.11	Develop standards for private streets in subdivisions that will allow gated communities in areas that are not necessary for the future connectivity and continuation of the City’s street grid.	Exclusion	Encourages gated communities. Gated communities exclude lower-income residents, thus increasing inequality at the local level (Vesselinov 2008; Traub 2000).
Goal ED3	Encourage or attract upper-middle-income residential development.	Exclusion, Displacement	Excludes lower income households and may contribute to displacement as affordable housing is replaced with housing for upper-middle incomes.
Goal ED3 Policy 3.1	Develop incentives to encourage development of large homes on large lots attractive to upper-middle-income families. Incentives (such as reduction in building fees and construction sales taxes) should be developed for homes.	Exclusion, Displacement ; Disparate impacts	Excludes lower income households (which includes the majority of non-white households in the City) and may contribute to displacement as affordable housing is replaced with housing for upper-middle-income households. Developable land is earmarked for high-income, SFR housing, eliminating options for middle-income housing, which supports a range of socioeconomic needs.

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Goal, Policy, or Regulation	Text	Possible Impact	Reason
SFRLand Use Designation	Provide for the development of housing at approximately four dwelling units per gross acre. This density range anticipates development of homes on individual lots or the development of duplexes or detached second units in specific areas. This designation is applied to areas developed into SFR neighborhoods and to areas expected to develop in lower-density residential patterns.	Exclusion Segregation	Makes up most of the land use in the City. It limits most middle-income housing (except for duplexes) in the majority of the City and results in SFR development on large lots and in low densities. This results in exclusive and expensive neighborhoods that exclude lower income households. This regulation may also result in segregation because lower-income households (which include the majority of non-white households in the City) are limited to those areas that are designated for higher densities and a variety of housing types.
EMC 18.05020, Residential Land Use Matrix	Limits allowed housing types in the R-1 and R-2 zones to single-family residences. Duplexes are allowed as conditional use in the R-2 and R-3 zone (on lots less than 12,400 square feet).	Exclusion	The R-1 and R-2 zones make up most of the zoning for housing in the City. Because these zones limit the types of housing to more expensive single-family homes (with duplexes being a conditional use), it likely excludes low-income households from living in many neighborhoods by reducing the housing options available.
EMC 18.06.030, Densities and Dimensions	Requires a minimum 8,400 and a maximum 15,000 square-foot lot sizes.	Exclusion	Large minimum lot sizes may result in more expensive exclusive neighborhoods that are unaffordable to lower-income households.
EMC 19.12.075, Single Family Design Standards	EMC 19.12.075.F.3, Roof Pitch Roof pitch should be a minimum of 4:12 and maximum of 12:12 for the primary roof structure. EMC 19.12.075.F.6 Roof Eaves Roof eaves with a minimum projection of 12 inches from the intersection of the roof and exterior wall shall be required for all homes. EMC 19.12.075.F.7.f Tile, metal, or 30-year composition roof shingles are permitted. Three-tab shingles are not permitted.	Segregation, Exclusion	This regulation may have the effect of segregating manufactured homes to the RMHP zone, and excluding them from most areas in the R-1, R-2, and R-3 zones because lower-cost manufactured homes typically have 3:12 roof pitches and three-tab roofing in accordance with HUD standards. Because lower-cost manufactured homes are more affordable than stick-built homes, this may result in exclusion of lower-income households from large areas of the City and segregating them in the RMHP zone.
EMC 19.12.075, Single Family Design Standards	Entire section of municipal code.	Exclusion	May limit the availability of housing choices available at lower prices affordable to low-income households.

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Goal, Policy, or Regulation	Text	Possible Impact	Reason
EMC 19.34.060, Accessory Dwelling Unit Occupancy Standards	No lot shall will be occupied by more than one family as defined in Chapter 15.04 This limitation shall be interpreted to accomplish its purpose, which is to ensure that the approval of an accessory dwelling unit shall not increase the overall density of a SFR neighborhood.	Exclusion	Excludes use of the accessory dwelling unit as housing for another household or family as an affordable housing option.
EMC 19.40.110.J	Duplexes in the R2 zoning district shall be separated by a distance of no less than 300 feet, measured from lot line to lot line .	Exclusion	The separation requirement is a barrier to duplex development, which is more affordable. It also does not treat all properties equally because it would prohibit construction of a duplex on a property located adjacent to an existing duplex.

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## 5. Conclusions

The evaluation shows indicators of exclusion, disparate impacts in housing, and displacement risk in the City. These indicators include few households of color, lower homeownership rates, and higher poverty rates for people of color in the City. The evaluation also indicates risk of displacement for approximately 32 percent of cost-burdened households. The following are likely the primary factors contributing to inequity and displacement risk:

- **Regional and systemic root causes:** Although the City is less diverse than King County, there has been growth in households of color over the last decade, indicating that observed housing disparity is influenced by larger regional and systemic causes, such as income disparity. Regionally, households of color receive lower incomes than white households, making homeownership difficult and resulting in higher rates of cost-burdened households.
- **Zoning or housing policies :** Zoning regulations and policies limit less-expensive housing types, such as middle housing, apartments, or manufactured homes, and promote or require development of more expensive single-family homes on large lots. These policies contribute to exclusion in two ways: (1) excluding low-income households (including many households of color) because they cannot afford to live in the community and (2) limiting availability of transit service because of low housing density (many households of color rely on transit service).
- **Limited transit service :** The City's location far from employment centers with limited transit likely makes it a difficult place for transit-dependent households; a higher percentage of households of color are transit dependent than white households. In King County, 13 percent of households of color do not have access to a car, whereas only 9 percent of white households do not have access to a car. The percentage of Black or African American households without access to a car is even higher at 19 percent (National Equity Atlas n.d.).
- **Rising costs and limited housing supply :** The rising cost of housing in the City and the region and a lack of supply of housing affordable to lower-income households is likely the main cause of displacement risk in the City.

The American Planning Association (2019) recommends the following policy measures to promote equity in housing policy:

- Promote diverse housing stock.
- Reform development regulations to promote fair housing.
- Remove regulatory barriers in zoning and subdivision regulations to create more opportunities for low-income households and remove discriminatory regulations regarding housing tenure and SFR definitions.
- Prepare master plan housing elements that identify housing needs for the entire community, including special populations, such as elderly, disabled, and homeless families and individuals.
- Increase the supply of housing through new production with specific goals around diversity of stock, tenure type and design and combating displacement.

Most impacts that result from local policies and regulations are related to exclusionary zoning, including prevalence of SFR zoning with large minimum lot sizes and zoning that limits most affordable housing types such as duplexes and triplexes to a few areas in the City. Many of these impacts can be mitigated by measures that allow a wider variety of housing types throughout the City and remove barriers to development of more affordable housing types such as middle housing.

Table 5-1 provides potential measures for the City to undertake “to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions” as required by RCW 36.70A.070(2)(f).

Table 5-1. Menu of Measures to Address Possible Disparate Impacts, Exclusion, Segregation, and Displacement Risk

Identifier	Measure	Effectiveness (Low, Moderate, High)	Ease of Implementation (Simple, Moderate, Complex)	Effort (Low, Moderate, High)
A	Adopt a policy resolution and framework for evaluating policies and regulations for disparate impacts.	High. This ensures that policies and regulations are evaluated for equity issues before adoption.	Moderate to Complex. This could be adopted by the City Council as a standalone resolution. It should also be included in the City's Comprehensive Plan.	Low to Moderate. This requires development of a policy resolution but requires an educational component for City staff and the public.
B	Replace or delete goals and policies that encourage development of upper-middle-income neighborhoods.	High. These policies promote displacement and exclusion of lower-income households.	Complex. This requires an amendment to the City's Comprehensive Plan.	Moderate. This requires an amendment to the City's Comprehensive Plan.
C	Require a percentage of units or lots in developments to be affordable. Require reduced lot sizes or a density bonus.	High. This mitigates for exclusion, displacement, and disparate impacts. It results in affordable housing in all developments in the City.	Complex. This requires an amendment to multiple sections of EMC to reduce lot size or create bonus incentives and also requires new code sections that address affordable housing covenants.	High. Requires amendment to the Comprehensive Plan. Implementation of housing affordability covenants would likely require additional staffing and legal review.
D	Implement a system of density bonuses for affordable housing in all zones.	Moderate. This would mitigate for exclusion, displacement, and disparate impacts. It may not result in construction of additional affordable housing.	Complex. This requires an amendment to multiple sections of EMC to reduce lot size or create bonus incentives and also requires new code sections that address affordable housing covenants.	High. Requires amendment to the Comprehensive Plan. Implementation of housing affordability covenants would likely require additional staffing and legal review.
E	Allow lot size to be reduced in the R1 and R-2 zones in return for affordable housing covenant guaranteeing affordability for some time period.	High. Mitigates for exclusion and displacement. Sufficient reduction in lot size would allow developers to add affordable units into market-rate subdivisions.	Complex. This requires an amendment to multiple sections of EMC to reduce lot size or create bonus incentives and also requires new code sections that address affordable housing covenants.	High. Implementation of housing affordability covenants would likely require additional staffing and legal review.
F	Allow duplexes in the R-1 and R-2 zones as permitted uses.	Moderate. This would mitigate for exclusion by allowing households of all income levels to live throughout the City if	Moderate. This requires an amendment to one section of EMC.	Low. This would be a relatively minor EMC amendment, affecting one section.

Identifier	Measure	Effectiveness (Low, Moderate, High)	Ease of Implementation (Simple, Moderate, Complex)	Effort (Low, Moderate, High)
		units are constructed. It may or may not result in construction of any duplexes.		
G	Allow duplexes in all zones as permitted uses.	Moderate. This would mitigate for exclusion by allowing households of all income levels to live throughout the City if units are constructed. It may or may not result in construction of any duplexes.	Moderate. This requires an amendment to one section of EMC.	Low. This would be a relatively minor EMC amendment, affecting one section.
H	Allow duplexes, triplexes and quadplexes in all zones as permitted uses.	High. This would mitigate for exclusion by diversifying housing stock and allowing households of all income levels to live throughout the City. It may or may not result in construction of additional units.	Moderate. This requires an amendment to several sections of EMC.	Moderate. This would require amendment to EMC and one or more sections in the Comprehensive Plan.
I	Provide a density bonus for construction of duplexes in the R2 and R-3 zones.	High. This would mitigate for exclusion, segregation, and displacement by allowing households of all incomes to live throughout the City. A density bonus may increase the number of affordable housing units and could help improve future transit service.	Moderate to Complex. This requires an amendment to multiple sections of EMC. It could become complex if the density bonus is tied to performance standards or form-based design.	Moderate. Requires one or more amendments to EMC and possible amendment of the Comprehensive Plan.
J	Provide a density bonus for the construction of duplexes in the R2 and R-3 zones with affordability covenants guaranteeing affordability for some time period.	High. This would mitigate for exclusion, segregation, and displacement by allowing households of all incomes to live throughout the City. A density bonus may increase the likelihood that units will be constructed. Density bonus could help improve future transit service.	Complex. This requires an amendment to multiple sections of EMC to create incentives and also requires new code sections that address affordable housing covenants.	High. Implementation of housing affordability covenants would likely require additional staffing and legal review.
K	Increase density from one dwelling unit per	Moderate. This may result in a wider	Complex. This requires an amendment to	Moderate. This requires one or more

Identifier	Measure	Effectiveness (Low, Moderate, High)	Ease of Implementation (Simple, Moderate, Complex)	Effort (Low, Moderate, High)
	6,200 square feet to one dwelling unit per 3,100 square feet in R-3 zone.	variety of middle-income housing that may allow lower-income households more choices. However, it may still promote segregation if there is a limited amount of R-3 zoning.	multiple sections of EMC and may require an amendment to the Comprehensive Plan.	amendments to EMC and may require an amendment of the Comprehensive Plan. It likely requires need for additional traffic analysis.
L	Increase density from one dwelling unit per 2,900 square feet to one dwelling unit per 1,400 square feet in R-4 zone.	Moderate. This may create an incentive for development of additional choices for low-income households. However, it may still promote segregation if other types of housing are not allowed in R-1 and R-2.	Complex. This requires an amendment to multiple sections of EMC and may require an amendment to the Comprehensive Plan.	Moderate. This requires one or more amendments to EMC and may require an amendment of the Comprehensive Plan. It likely requires need for additional traffic analysis.
M	Exempt small houses from the SFR design standards.	Moderate. This may mitigate for exclusion by making it easier for smaller, more affordable homes to be constructed, but it is unlikely to result in significant construction of additional affordable housing without a reduction in lot size.	Moderate. This would require amendments to several sections of EMC.	Moderate. Requires one or more amendments to EMC and possible amendment of the Comprehensive Plan.
N	Simplify design standards for middle housing.	Low. Simplifying the design standards for middle-income housing is unlikely to promote construction of additional affordable housing unless combined with a density bonus or an expansion of permitted uses.	Moderate. This would require amendments to several sections of EMC.	Moderate. Requires one or more amendments to EMC and possible amendment of the Comprehensive Plan.
O	Simplify or eliminate design standards for all single-family residences	Moderate. This may mitigate for exclusion by reducing the cost of construction, but it is unlikely to result in significant construction of additional affordable housing without another measure.	Moderate. This would require amendments to several sections of EMC.	Moderate. Requires one or more amendments to EMC and possible amendment of the Comprehensive Plan.

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Identifier	Measure	Effectiveness (Low, Moderate, High)	Ease of Implementation (Simple, Moderate, Complex)	Effort (Low, Moderate, High)
P	Allow accessory dwelling units to be rented separately from the primary residence.	Moderate. This may mitigate for exclusion by allowing lower-income households to rent in existing SFR zones. It may make accessory dwelling units available for rental.	Moderate. This requires amendment to one section of EMC.	Low to Moderate. This requires one amendment to EMC.
Q	Eliminate lot coverage requirements for accessory dwelling units.	Moderate. This may mitigate for exclusion by facilitating construction of ADUs if combined with measure P.	Moderate. This requires amendment to one section of EMC.	Low. This requires one amendment to EMC.
R	Designate additional areas for medium density residential and R-3 zoning.	High. This would reduce exclusion, segregation, and displacement by increasing affordable housing options for households of all incomes.	Complex. This involves rezoning properties.	High. This involves amendment of the Comprehensive Plan, which would likely involve the need for additional traffic analysis. It requires rezone of individual properties.
S	Rezone R1 to R-2 or R-3.	Moderate. This would reduce exclusion, segregation, and displacement by increasing the supply of land available for residential construction at more affordable lot sizes.	Complex. This involves rezoning properties.	High. This involves amendment of the Comprehensive Plan, which would likely involve the need for additional traffic analysis. It requires rezone of individual properties.
T	Reduce minimum lot sizes and eliminate maximum lot size in the R-1 and R-2 zones	Moderate. This would reduce exclusion, segregation, and displacement by increasing the supply of land available for residential construction at more affordable lot sizes.	Moderate. This requires amendment of several sections of EMC.	High. This involves amendment of the Comprehensive Plan, which may involve the need for additional traffic analysis.
U	Publicize the process for property owners to remove racial covenants from the chain of title as allowed by RCW49.60.227(1).	Moderate. Effectiveness is moderate if there are racial covenants in place.	Simple. This uses existing City website to educate homeowners. The law was amended to make the process simple and inexpensive for homeowners.	Low. This could be added to the City website with links to forms and information.
V	Reduce regulatory requirements such as minimum lot size and	Moderate. This inclusion could create one story homes for	Moderate. This requires amendments to the	Moderate. Requires one or more amendments to EMC

Identifier	Measure	Effectiveness (Low, Moderate, High)	Ease of Implementation (Simple, Moderate, Complex)	Effort (Low, Moderate, High)
	design standards for low cost dwellings. Define low cost dwelling as a dwelling that is limited to 1000 - 1500 square feet in size excluding garage	young adults and seniors at a price point that is more affordable. Likely would require lot size reduction to be most effective.	EMC development regulations.	and possible amendment of the Comprehensive Plan.
W	Amending municipal code to increase building heights in residential areas	Moderate. This would allow for better quality and encourage the development of more multifamily and Accessory dwelling Units.	Moderate. This requires amendments to the EMC development regulations.	Moderate. Requires one or more amendments to EMC and possible amendment of the Comprehensive Plan.

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## GMA Racially Disparate Impact Report

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**Appendix A**  
**Supplemental Tables**

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## Appendix A. Supplemental Tables

**Table A-1. Households by Income Category**

2021 Income in Past 12 Months (inflation-adjusted dollars)	Percent	Households
Less than \$10,000	2.9%	151
\$10,000 to \$14,999	5.2%	270
\$15,000 to \$24,999	8.7%	452
\$25,000 to \$34,999	3.4%	176
\$35,000 to \$49,999	11.0%	571
\$50,000 to \$74,999	12.0%	623
\$75,000 to \$99,999	9.8%	509
\$100,000 to \$149,999	21.3%	1106
\$150,000 to \$199,999	17.0%	882
\$200,000 or more	8.6%	446

**Table A-2. Comparison of Sociodemographic Characteristics between Census Tracts, Enumclaw, 2020 and 2021**

	Census Tracts				City
	314	313.02	315.02	313.01	
Population	5,811	4856	5000	2518	12,543
Median household income	95,874	54,729	98,882	113,750	78,750
Housing units	2,586	1950	2074	992	5365
Bachelor's degree or higher	30%	22%	28%	27%	26%
Employment rate	63%	64%	62%	53.40%	63%
Without healthcare	4.70%	7.40%	5.8%	3.5%	5.7
Immigrants	6.50%	6.80%	7.2%	9.5%	6.8
Over 65%	17.30%	16.90%	19.5%	21.4%	17.10%
Poverty	4.30%	13.20%	4.2%	5.0%	8.10%
Commute time (minutes)	30.7	35.2	39.70	38.00	33.70
Gross rent	\$ 1,381	1,137	1,811	1,825	1,199
Homeownership rate	60%	70.3%	80%	88.6%	64.7%
Vacancy rate	6.0%	4.4%	3.1%	12.8%	3.5%
Occupied housing units	2,427	1865	1927	956	5077
Vacant units	159	85	147	36	288
American Indian/Alaska Native	57	62	83	30	-
Asian	34	59	59	34	-
Black or African American	45	48	33	12	-
Hispanic or Latino	454	570	317	354	-
Hawaiian or Pacific Islander	8	15	26	5	-
White alone	4,833	3,798	4,222	1,998	-
Some other race	201	279	136	221	-
Two or more races	519	484	441	218	-

Source: ACS Tables P1, P2, H1, DP02, DP03, DP04, DP05, S1901, and S1501 for Enumclaw City in 2020-2021 (USCB n.d.).

**Table A-3. Population by Race and Ethnicity**

Race or Ethnicity	2020 Population
Black or African American	93
American Indian and Alaska Native	112
Asian	135
Native Hawaiian and Other Pacific Islander	46
Some other race	58
Two or more races	694
Hispanic or Latino origin (of any race)	1,176
White alone, not Hispanic or Latino	10,113
Total	12,427




Source: ACS Table S0601 for Enumclaw City in 2020 (USCB n.d.).

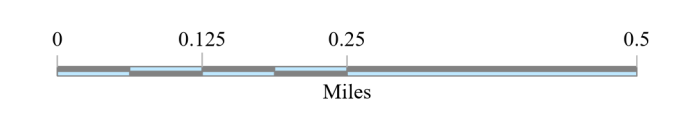
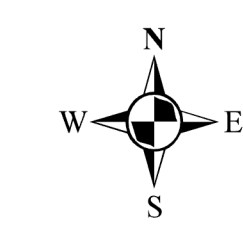
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**Appendix B**  
**City of Enumclaw Future Land Use Map**

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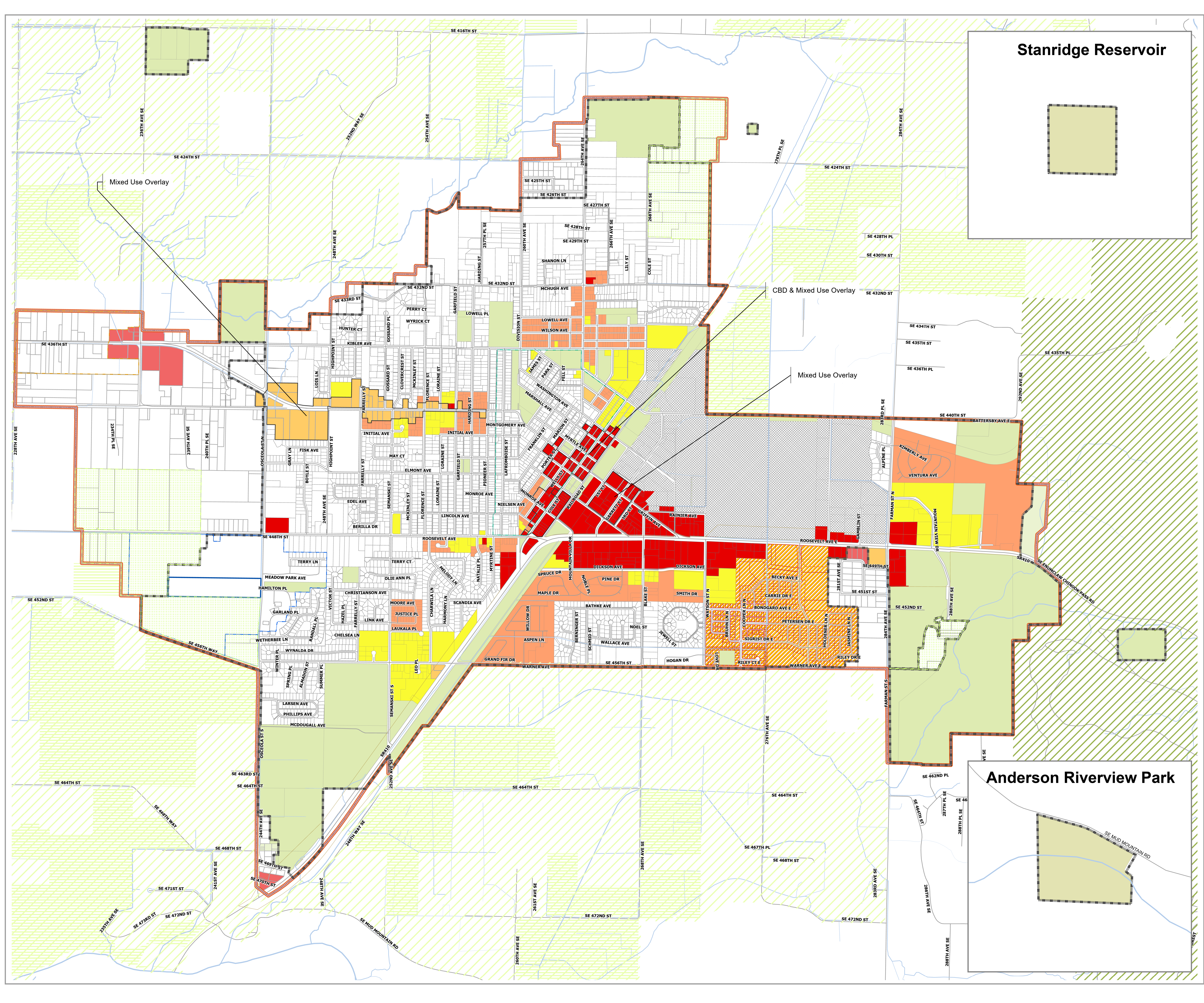
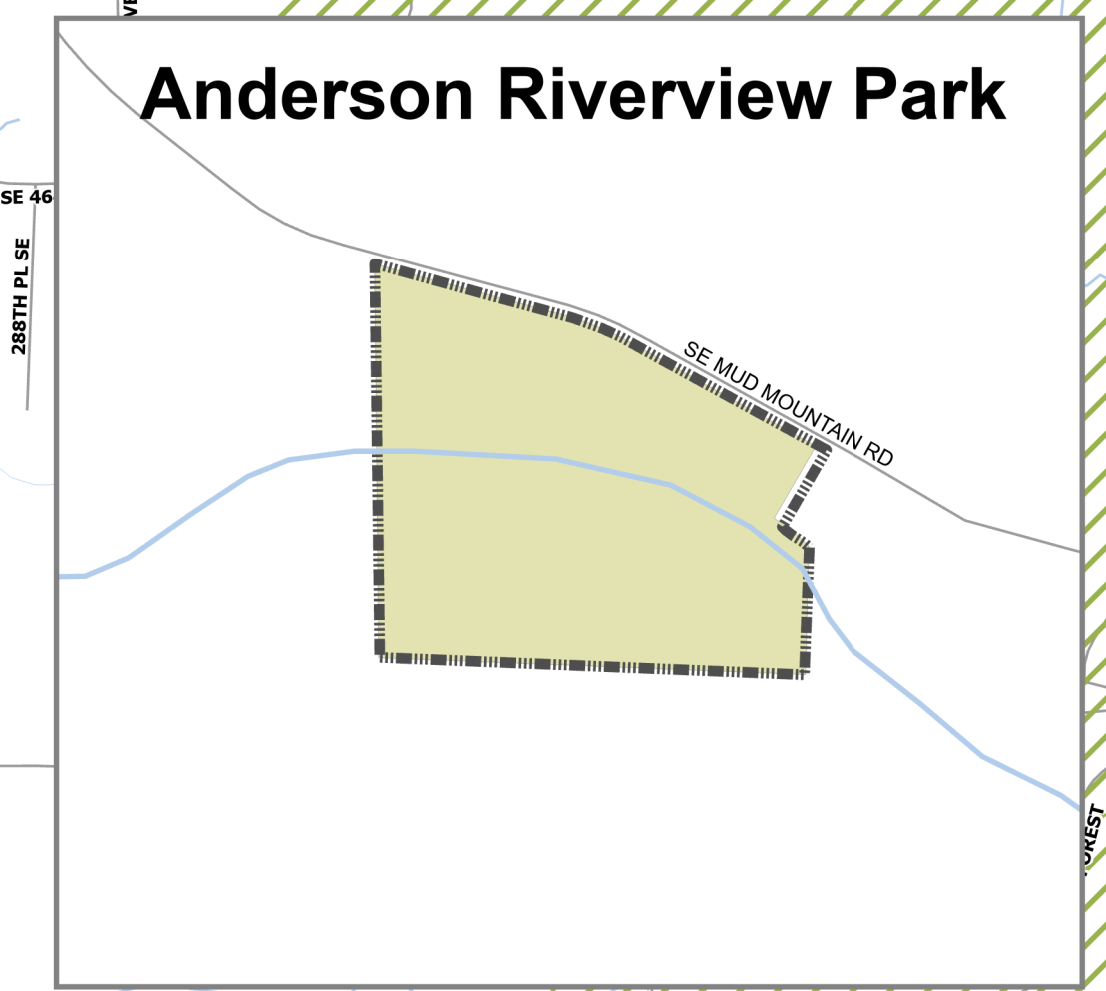
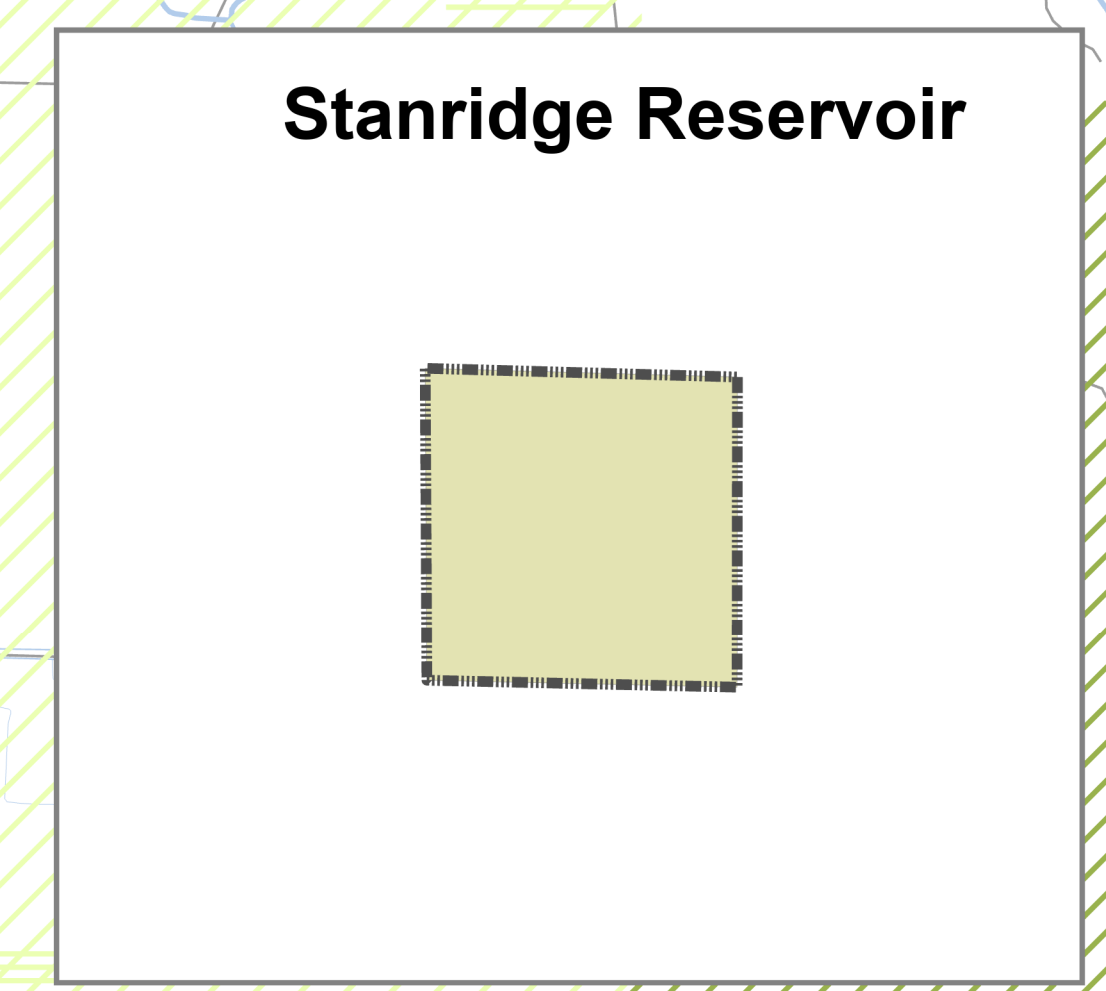
## ENUMCLAW OFFICIAL LAND USE MAP

-  Airport
-  Corridor Overlay
-  Mixed Use Overlay
-  Old Town Overlay
-  Airport Overlay
-  Home Occupation Overlay
-  Urban Rural Transition Overlay
-  City Limits
-  Urban Growth Boundary
-  King County Ag Resource Land
-  King County Forest Resource land
-  Streets
-  Commercial
-  Light Industrial
-  Mixed Density Residential
-  Multi-Family Residential
-  Office
-  Public/Institutional
-  Planned Unit Development
-  Single Family Residential
-  KC Farmland Preservation Program



*The City of Enumclaw makes every effort to provide correct information, but makes no representation as to the completeness or accuracy of this map.*

*September 2021  
 As of Ordinance No. 2715*



**Appendix C**  
**City of Enumclaw Zoning Map**

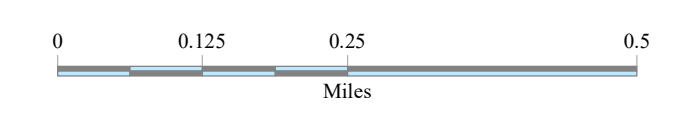
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DEPARTMENT OF PLANNING  
1309 MYRTLE AVE, ENUMCLAW, WA. 98022  
PHONE (360) 825-3593 FAX (360) 825-7232

## ENUMCLAW OFFICIAL ZONING MAP

- Airport
- Corridor Overlay
- Mixed Use Overlay
- Old Town Overlay
- Airport Overlay
- Home Occupation Overlay
- Urban Rural Transition Overlay
- City Limits
- Urban Growth Boundary
- King County Ag Resource Land
- King County Forest Resource land
- Streets
- Residential 1 (15,000 sq. ft.)
- Residential 2 (8,400 sq. ft.)
- Residential 3 (6,200 sq. ft.)
- Residential 4 (6,200 sq. ft.)
- Residential Mobile Home Park
- Planned Unit Development
- Central Business 1
- Central Business 2
- Neighborhood Business
- Highway and Community Business
- General Office
- General Office-Hospital
- Hospital
- Light Industrial
- Public
- KC Farmland Preservation Program

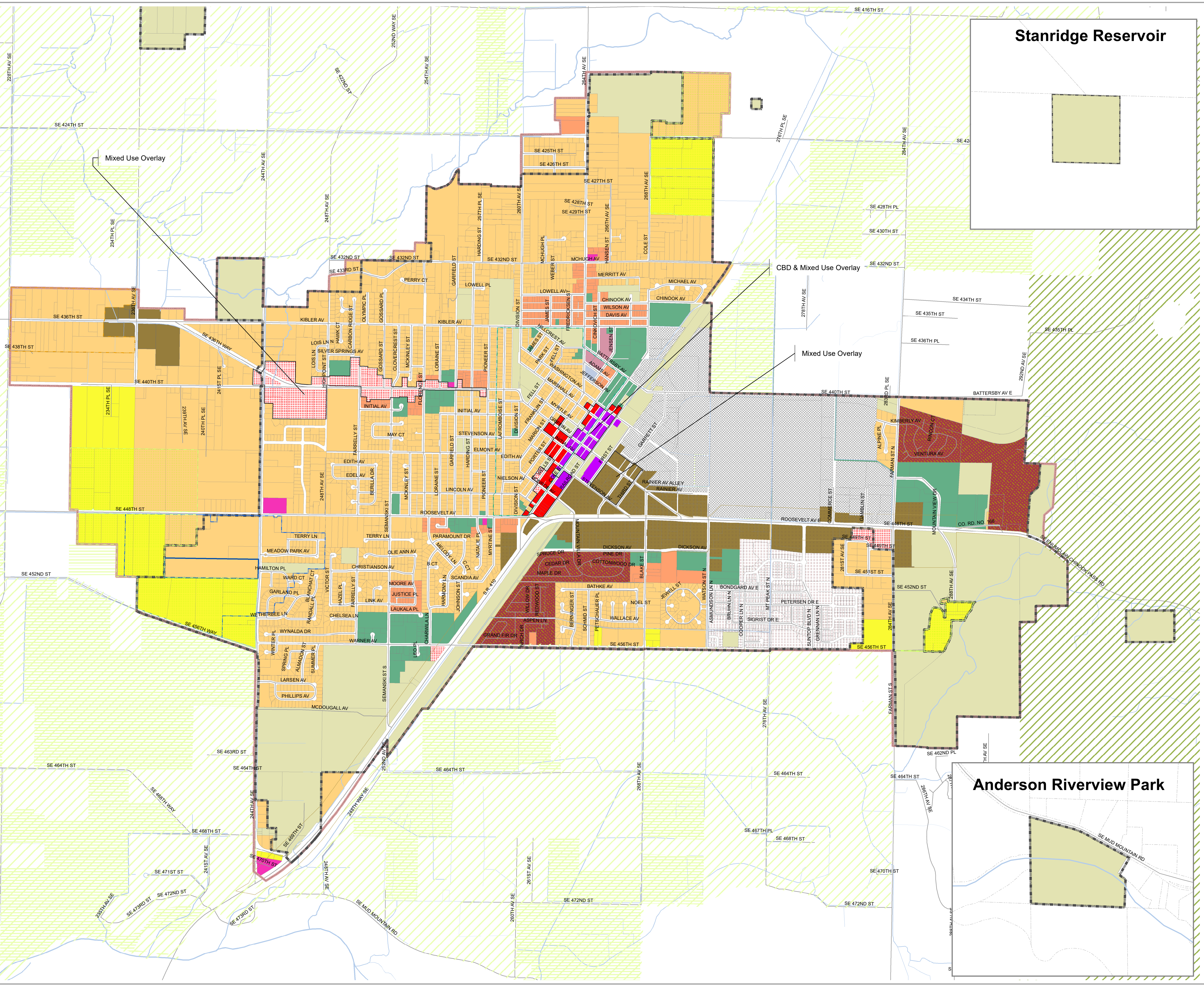


*The City of Enumclaw makes every effort to provide correct information, but makes no representation as to the completeness or accuracy of this map.*

August 2022  
As of Ordinance No. 2739

Stanridge Reservoir

Anderson Riverview Park



**Appendix D**  
***Enumclaw Municipal Code Section***  
**18.05 – Permitted Uses**

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## 18.05.020 Residential land use matrix.

### A. Residential Land Use Matrix.

KEY P – Permitted Use C – Conditional Use S – Special Use	RESIDENTIAL ZONES					COMMERCIAL/INDUSTRIAL ZONES								
	Low Density SF	Mod Density SF	Mixed Residential	Multifamily Res	Residential Mobile Home Park	General Office	General Office-Hospital	Neighborhood Business	Highway Community Business	Central Business 1	Central Business 2	Light Industrial	Public Use	Hospital
SPECIFIC LAND USE	R-1	R-2	R-3	R-4	RMHP	GO	GO-H	NB	HCB	CB-1	CB-2	LI	P	H
<i>Adult family home</i> protected by state and federal law	P	P	P	P	P	P	P	P	P	P	P	P	P	P
<i>Assisted care living facility, nursing home</i> , subject to EMC <a href="#">19.32.040</a>				P			P		P	C	C			
Cottage housing, subject to Chapter <a href="#">19.40</a> EMC	P <sup>1</sup>	P <sup>1</sup>	P <sup>1</sup>	P <sup>1</sup>	P <sup>1</sup>									
<i>Dwelling unit, accessory</i> subject to Chapter <a href="#">19.34</a> EMC	P	P	P	P								P <sup>2</sup>		
<i>Dwelling unit, duplex</i> (two units per structure), subject to Chapter <a href="#">19.40</a> EMC		C	P <sup>3</sup> /C	P						C	C			
<i>Dwelling unit, single-family detached</i> (one unit per structure)	P	P	P	P		C	C			C	C			
<i>Dwelling unit, live-work</i>				P <sup>4</sup>				P <sup>5</sup> /C	P <sup>6</sup> /C	P <sup>6</sup> /C	P <sup>6</sup> /C			
<i>Multifamily development</i> (3+ units per structure), subject to Chapter <a href="#">19.40</a> EMC				P		P <sup>2</sup>			P <sup>5</sup> /C	P <sup>5,6</sup> /C	P <sup>5,6</sup> /C			
Group quarters, dormitories, fraternal houses, <i>boardinghouse</i> , not including <i>secure</i>				C			P		P <sup>5</sup> /C					

GMA Racially Disparate Impact Report  
 Appendix D – *Enumclaw Municipal Code* Section 18.05 – Permitted Uses

KEY	RESIDENTIAL ZONES					COMMERCIAL/INDUSTRIAL ZONES								
	Low Density SF	Mod Density SF	Mixed Residential	Multifamily Res	Residential Mobile Home Park	General Office	General Office-Hospital	Neighborhood Business	Highway Community Business	Central Business 1	Central Business 2	Light Industrial	Public Use	Hospital
SPECIFIC LAND USE	R-1	R-2	R-3	R-4	RMHP	GO	GO-H	NB	HCB	CB-1	CB-2	LI	P	H
<i>community transition facilities or halfway house</i>														
<i>Home occupations, subject to Chapter 19.36 EMC</i>	P	P	P	P		P	P							
<i>Mobile home park, subject to Chapter 18.16 EMC</i>					P									
<i>Recreational vehicle parks, subject to Chapter 19.30 EMC</i>					C				C				P	
<i>Retirement homes</i>				P										
<b>GENERAL CROSS REFERENCES:</b>	Land use table instructions, see EMC <a href="#">18.05.010</a> ; Development standards, see EMC Titles <a href="#">18</a> and <a href="#">19</a> ; Application and review procedures, see Chapters <a href="#">15.16</a> through <a href="#">15.36</a> EMC; General provisions, see Chapter <a href="#">15.06</a> EMC; Italicized uses are defined in Chapter <a href="#">15.04</a> EMC.													

**B. Residential Land Use Footnotes.**

1. Upon approval of an innovative cottage demonstration project per Chapter 19.46 EMC.
2. A nightwatchman’s quarters are allowed as an accessory use to a use permitted in the zone.
3. Permitted with a minimum lot size of 12,400 square feet per duplex, otherwise conditional use. Reference EMC [18.06.030](#).
4. Allowed as part of a live-work project. The work space must clearly constitute an accessory use of the building and property, and the use shall not result in a conversion of the property or building from primarily multifamily to primarily nonresidential use.
5. Dwellings or living quarters must be located above primary use. Parking is provided in private parking areas or garages on the basis of one parking space for each dwelling unit within 400 feet.
6. Multifamily residential and live-work uses shall be permitted only in the mixed use overlay when included within a mixed use development. (Ord. 2533 § 1 (Exh. A), 2013).

**Appendix E**  
***Enumclaw Municipal Code Section***  
**18.06.030 – Densities and Dimensions**

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**18.06.030 Densities and dimensions – Residential zones.**

A. Density and Dimension Table.

STANDARDS	R-1	R-2	R-3	R-4	RMHP	PUD
Minimum Lot Area	15,000 sf	8,400 sf <sup>1</sup>	6,200 sf	6,200 sf <sup>2</sup>	5 acres	Requirements found in Chapter <a href="#">18.34</a> EMC, Planned Unit Development (PUD)  Requirements found in Chapter <a href="#">18.16</a> EMC, Residential Manufactured Home Park District (RHMP)
Maximum Density	N/A	N/A	1 DU per 6,200 sf <sup>3</sup>	1 DU per 2,900 sf <sup>4</sup>	1 DU per 6,200 sf	
Maximum Lot Area	N/A	18,000 sf <sup>5</sup>	12,500 sf <sup>5</sup>	N/A	N/A	
Minimum Street Frontage	50 ft	50 ft	50 ft	50 ft <sup>2</sup>		
Minimum Front Yard Setback	20 ft	20 ft	20 ft	20 ft		
Minimum Side Yard Setback <sup>6,7</sup>	9 ft	9 ft	9 ft	9 ft <sup>2,8,9</sup>		
Rear Yard	25 ft	25 ft	25 ft	25 ft		
Maximum Building Coverage <sup>10</sup>	30%	40%	40%	40% <sup>11,12</sup>		
Maximum Building Height	30 ft	30 ft	30 ft	30 ft <sup>13</sup>		
Maximum Height of Accessory Building	≤ 120 sf 10 ft > 120 sf 18 ft	≤ 120 sf 10 ft > 120 sf 18 ft	≤ 120 sf 10 ft > 120 sf 18 ft	≤ 120 sf 10 ft > 120 sf 18 ft		
Detached Accessory Building ≤ 120 sf Minimum Side and Rear Setbacks	3 ft	3 ft	3 ft	3 ft		
Detached Accessory Building >120 sf Minimum Side and Rear Setbacks	7.5 ft	7.5 ft	7.5 ft	7.5 ft		
Maximum Detached Accessory Building Coverage <sup>14</sup>	50%	50%	50%	50%		

B. Residential Density and Dimension Development Conditions.

1. When a short plat provides for one or more lots with a minimum square footage of 8,400 square feet, one lot of not less than 7,500 square feet may be included in the short plat if approved by the administrator; provided, that all lots surrounding the parcel to be short platted are substantially greater than the minimum 8,400 square feet and it is compatible with the area surrounding the proposed short plat. The substandard area lot, when recorded, shall be restricted from applying for a variance which is related to lot area, yard setbacks and lot coverage. This restriction shall be placed on the face of the short plat when so recorded. This provision shall not apply to a short plat in which maximum lot size is exceeded per subsection (B)(5) of this section.
2. Lot size, minimum street frontage and minimum side yard setback may be modified for single-family, duplex, townhouse, cottage and zero lot line developments, subject to EMC [18.06.130](#).
3. Duplexes and cottage developments may be permitted at a density of 3,100 square feet per dwelling unit by conditional use permit.
4. Densities of up to 1,452 square feet per dwelling unit (30 units per acre) may be permitted for retirement homes and assisted care living facilities by conditional use permit.
5. Maximum lot size does not apply in the following circumstances:
  - a. Creation of a lot that is developed with an existing house located such that compliance with the maximum lot size would require removal of the house or unusual lot configuration in order to subdivide the property.
  - b. Creation of a lot through a lot line adjustment where one or more of the existing lots are larger than the maximum lot size; provided, that a lot that conforms to the maximum lot size may not be made nonconforming.
  - c. Creation of an open space, critical area or future development tract.
6. Side yard setback for public and semipublic buildings shall be a minimum of 25 feet in width.
7. Where a utility easement is recorded adjacent to a side lot line, there shall be a side yard no less than the width of the easement.
8. There shall not be less than 15 feet between each multifamily building on a single lot.
9. Optional Aggregate Setback Allowance. The city may reduce the individual required setbacks for lots with unusual geometry, flag lots with undesignated setbacks, or lots with

special site conditions such as an existing cluster of significant trees or other unique natural, cultural, or historic features that should be preserved without disturbance. However, the total of the setbacks shall be no less than the sum of the minimum front, rear and side yard setbacks for that zone. In order to exercise this option the city must determine that a public benefit is gained by relaxing any setback standard.

10. On any lot over one acre in area, an additional five percent may be used for buildings related to agricultural or forestry practices.

11. Maximum parking area coverage: 30 percent.

12. Combined maximum lot and parking area coverage: 60 percent.

13. Except for pitched-roof buildings, which shall have a maximum peak not to exceed 35 feet, subject to the following conditions:

a. The average roof height shall not exceed 30 feet (defined as the midpoint between the roof peak and roof eave for a single pitch); and

b. The minimum side yard setbacks shall be increased two feet for every additional foot in building height above 30 feet.

14. Combined area of the rear and side yards. (Ord. 2537 § 1 (Exh. A), 2014).

**Appendix F**  
**Washington Department of Health**  
**Environmental Health Maps**

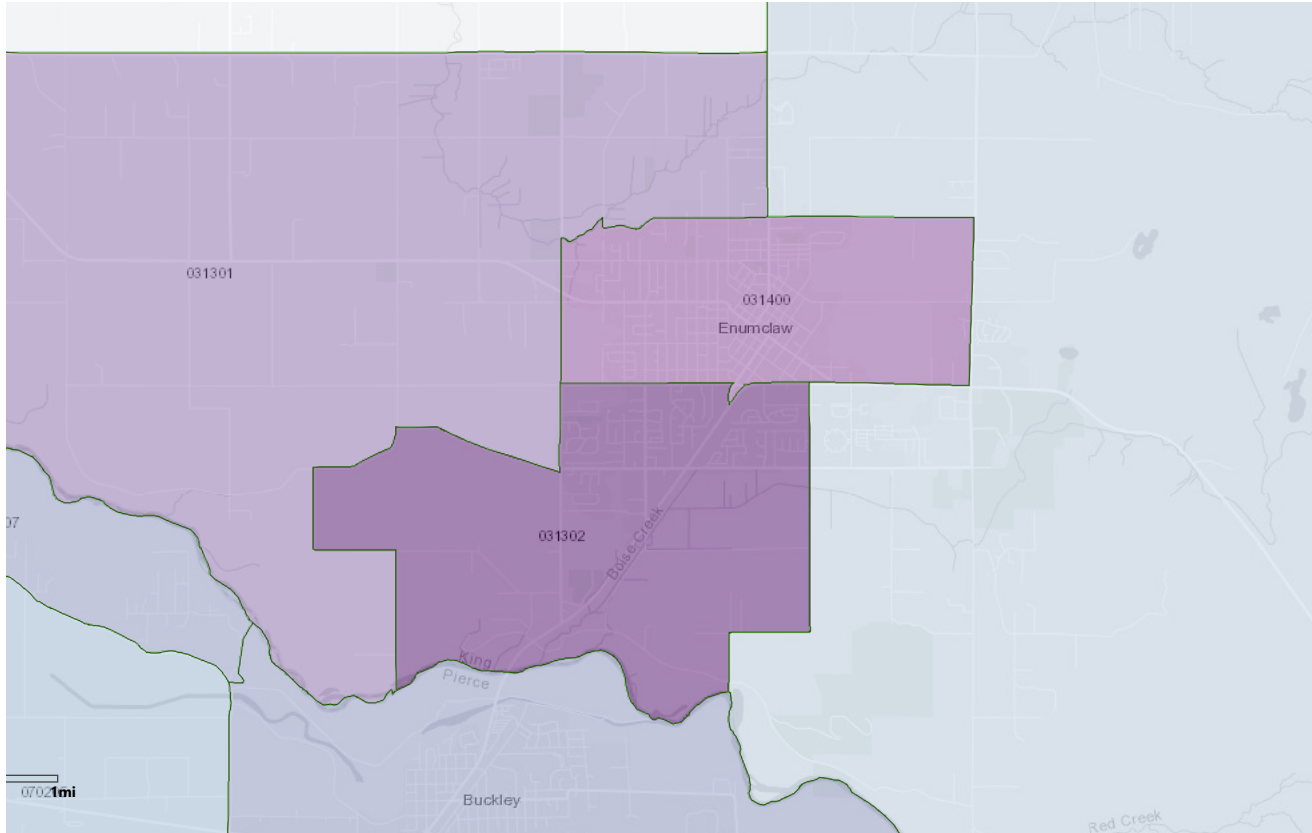
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**Environmental Health Disparities V 2.0 -> Socioeconomic Factors -> Unaffordable Housing (>30% of Income)**

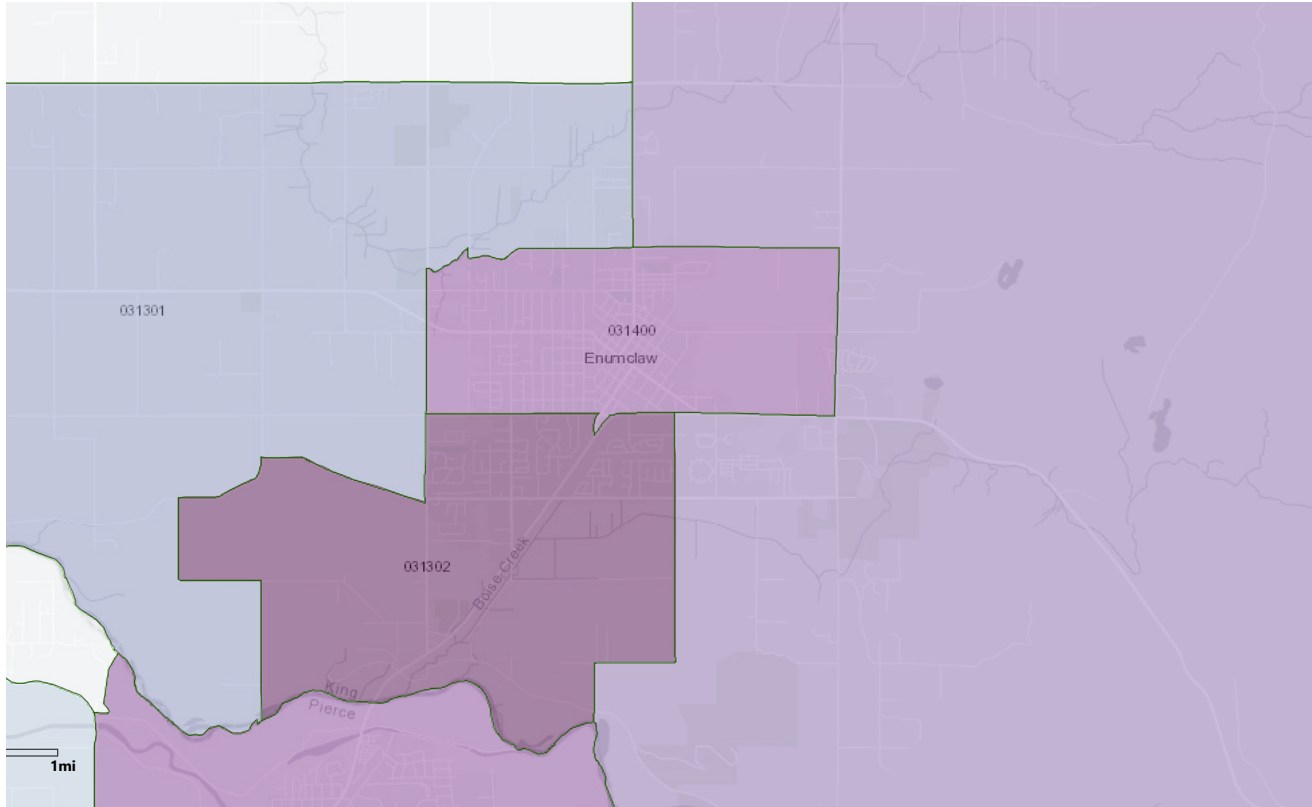
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**Legend**

- City Limits
- Historical Redlining (HOLC)
- National Flood Hazard Layer
- Wildfire Smoke Days
- Climate Projections ~2050
- County Boundaries
- Electric Utilities - Investor
- Electric Utilities - Public
- Former Orchard Lands
- Legislative Districts
- Opportunity Zones
- Railroads
- Rural/Urban Tiers2&4 CT
- School District Boundaries
- Arsenic Tacoma Smelter Plume
- Tribal Boundaries
- Zip Codes
- 100-year Flood Zone
- All Care Facilities - Census Tract
- Care Facilities - Adult Family Homes
- Center-Based Childcare Centers
- Ethnic Radio Stations
- Farmworkers Housing
- Prisons
- PM2.5 Pollution Exposure Zones from Traffic
- Hazardous Waste Sites
- Superfund National Priority List Sites
- Toxic Release Inventory (TRI) Sites
- WA Ecology Cleanup Sites

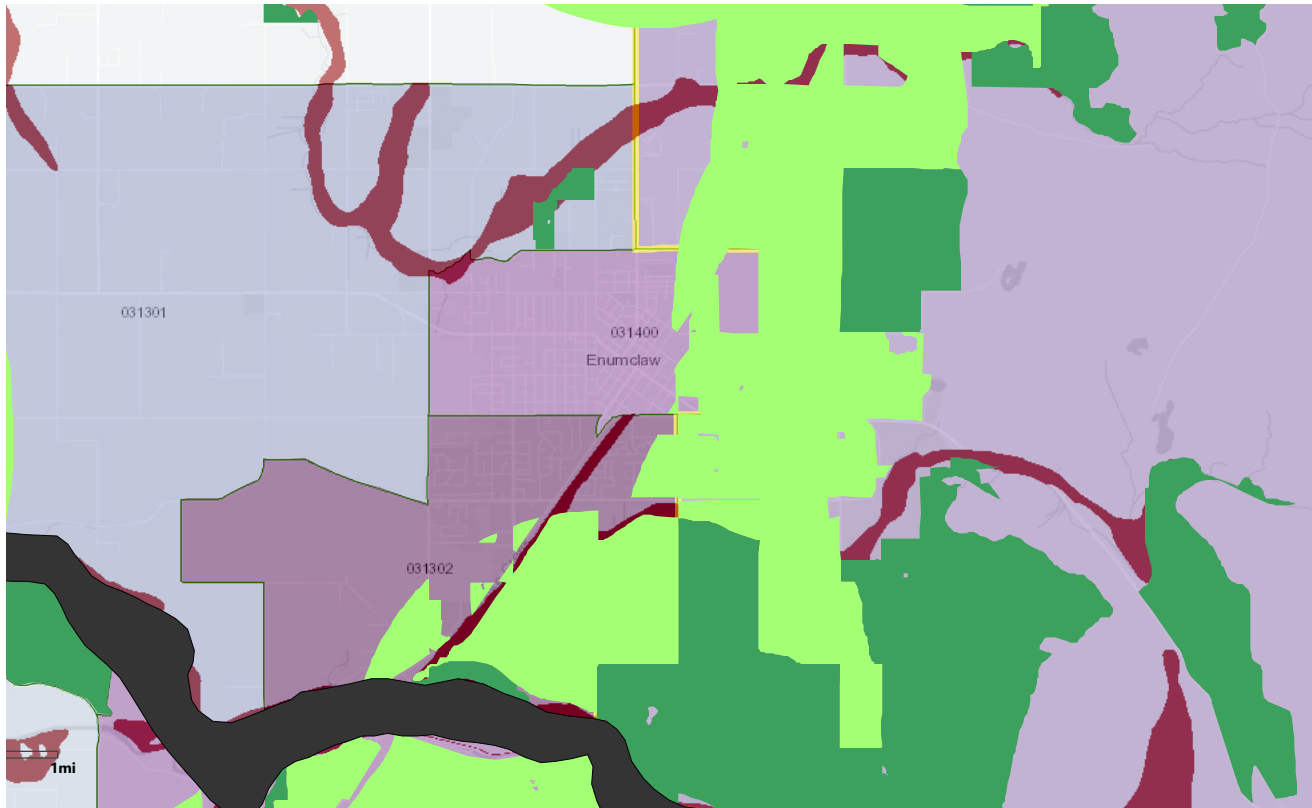
**Legend: (High)** 10 9 8 7 6 5 4 3 2 1 **(Low)**



**Legend**

- National Flood Hazard Layer
- Current Wildfires
- Current Wildfire Area
- Accountable Communities of Health
- County Boundaries
- Legislative Districts
- Rural/Urban Tiers 2&4 CT
- Tribal Boundaries
- Wildland Urban Interface
- Zip Codes
- 2015 Wildfire Burn Area
- 100-year Flood Zone
- Water Resource Inventory Areas
- Care Facilities - Adult Family Homes
- Care Facilities - Assisted Living
- Care Facilities - Nursing Homes
- Center-Based Childcare Centers
- All Care Facilities - Census Tract
- All Care Facilities - County
- Clinics
- Correctional Facilities
- Farmworkers Housing
- Faults
- Hospitals
- K-12 Public Schools (Zoom in to View)
- Tsunamis
- Lava Flows
- Near Volcano Hazards
- Lahars (mudflows)
- Sedimentation
- Leaking storage tank
- Diesel spill
- Spilling thermal liquid
- Pipeline
- Deep well

Legend: (High) 10 9 8 7 6 5 4 3 2 1 (Low)



Legend

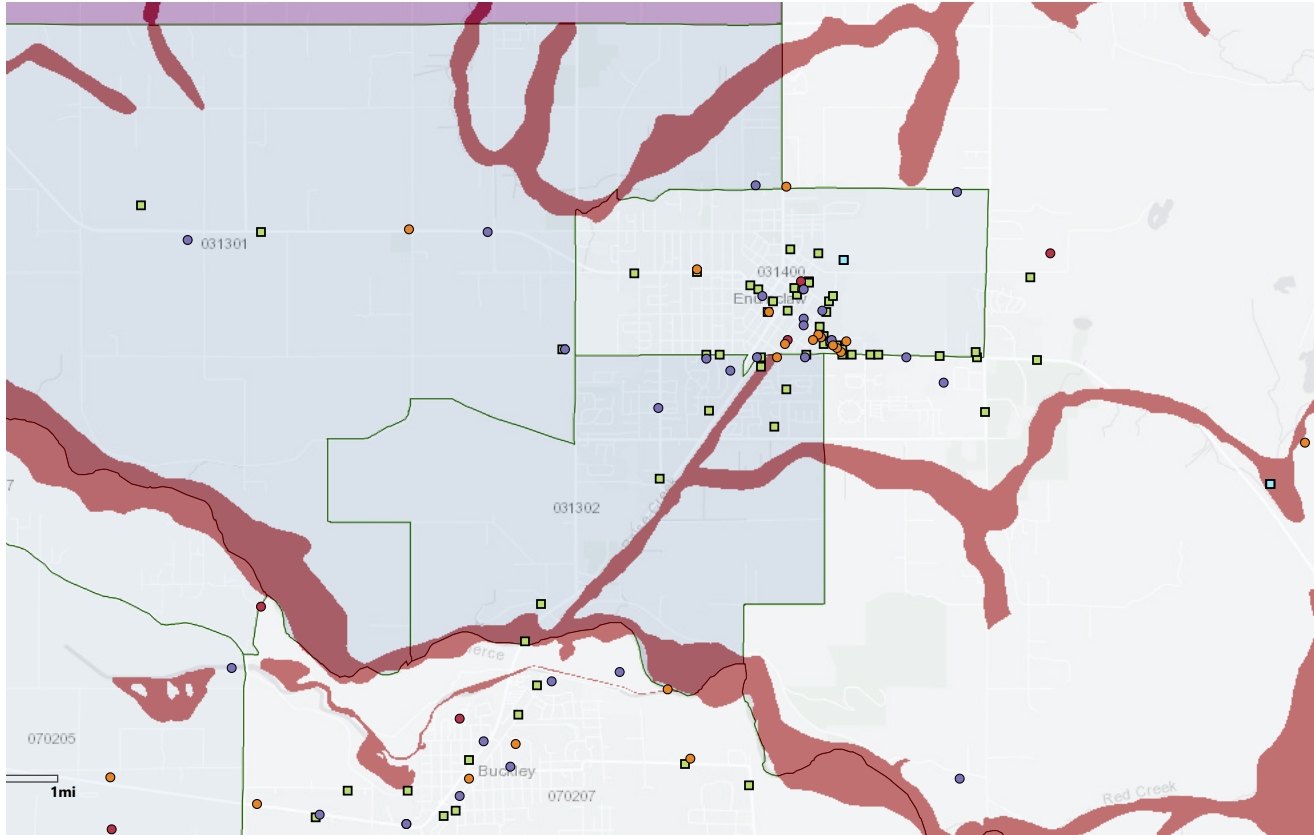
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- Lava Flows
- Near Volcano Hazards
- Lahars (mudflows)
- Sedimentation
- WA Ecology Cleanup Sites
- WA Ecology Cleanup Sites
- WA Ecology Cleanup Sites
- WA Ecology Cleanup Sites

Selection:

Date: 02/02/2023 at 4:04 PM

Environmental Health Disparities V 2.0 -> Socioeconomic Factors -> People of Color (Race/Ethnicity)

Legend: (High) 10 9 8 7 6 5 4 3 2 1 (Low)



Legend

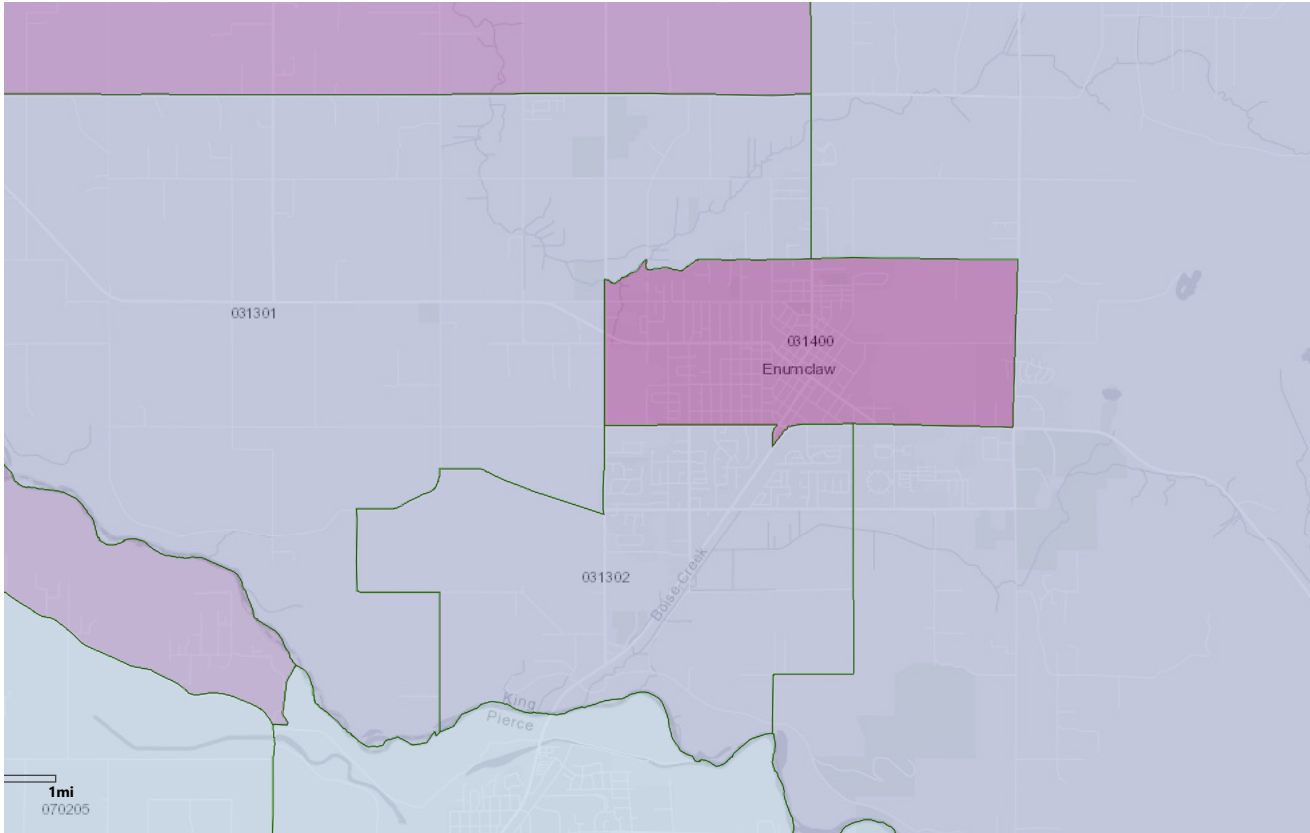
- City Limits
- Historical Redlining (HOLC)
- National Flood Hazard Layer
- Wildfire Smoke Days
- Climate Projections ~2050
- County Boundaries
- Electric Utilities - Investor
- Electric Utilities - Public
- Former Orchard Lands
- Legislative Districts
- Opportunity Zones
- Railroads
- Rural/Urban Tiers 2&4 CT
- School District Boundaries
- Arsenic - Tacoma Smelter Plume
- Tribal Boundaries
- Zip Codes
- 100-year Flood Zone
- All Care Facilities - Census Tract
  - Care Facilities - Adult Family Homes
  - Center-Based Childcare Centers
  - Ethnic Radio Stations
  - Farmworkers Housing
  - Prisons
- PM2.5 Pollution Exposure Zones from Traffic
- Hazardous Waste Sites
- Superfund National Priority List Sites
- Toxic Release Inventory (TRI) Sites
- WA Ecology Cleanup Sites
  - Cleanup action
  - Cleanup action
  - Monitoring action
  - Cleanup action

**Selection:**

**Date:** 02/02/2023 at 2:55 PM

**Environmental Health Disparities V 2.0 -> Environmental Exposures -> Toxic Releases from Facilities (RSEI Model)**

**Legend: (High)** 10 9 8 7 6 5 4 3 2 1 **(Low)**



**Legend**

- City Limits
- Historical Redlining (HOLC)
- National Flood Hazard Layer
- Wildfire Smoke Days
- Climate Projections ~2050
- County Boundaries
- Electric Utilities - Investor
- Electric Utilities - Public
- Former Orchard Lands
- Legislative Districts
- Opportunity Zones
- Railroads
- Rural/Urban Tiers2&4 CT
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- Arsenic Tacoma Smelter Plume
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  - Center-Based Childcare Centers
- Ethnic Radio Stations
- Farmworkers Housing
- Prisons
- PM2.5 Pollution Exposure Zones from Traffic
- Hazardous Waste Sites
- Superfund National Priority List Sites
- Toxic Release Inventory (TRI) Sites
- WA Ecology Cleanup Sites
  - Cleanup priority
  - Cleanup status
  - Monitoring priority
  - Progress
  - Cleanup complete

**Appendix G**  
**Areas of Potential Displacement Risk**

DRAFT

**ALL BUILDABLE / DEVELOPABLE LANDS**

Natural Area

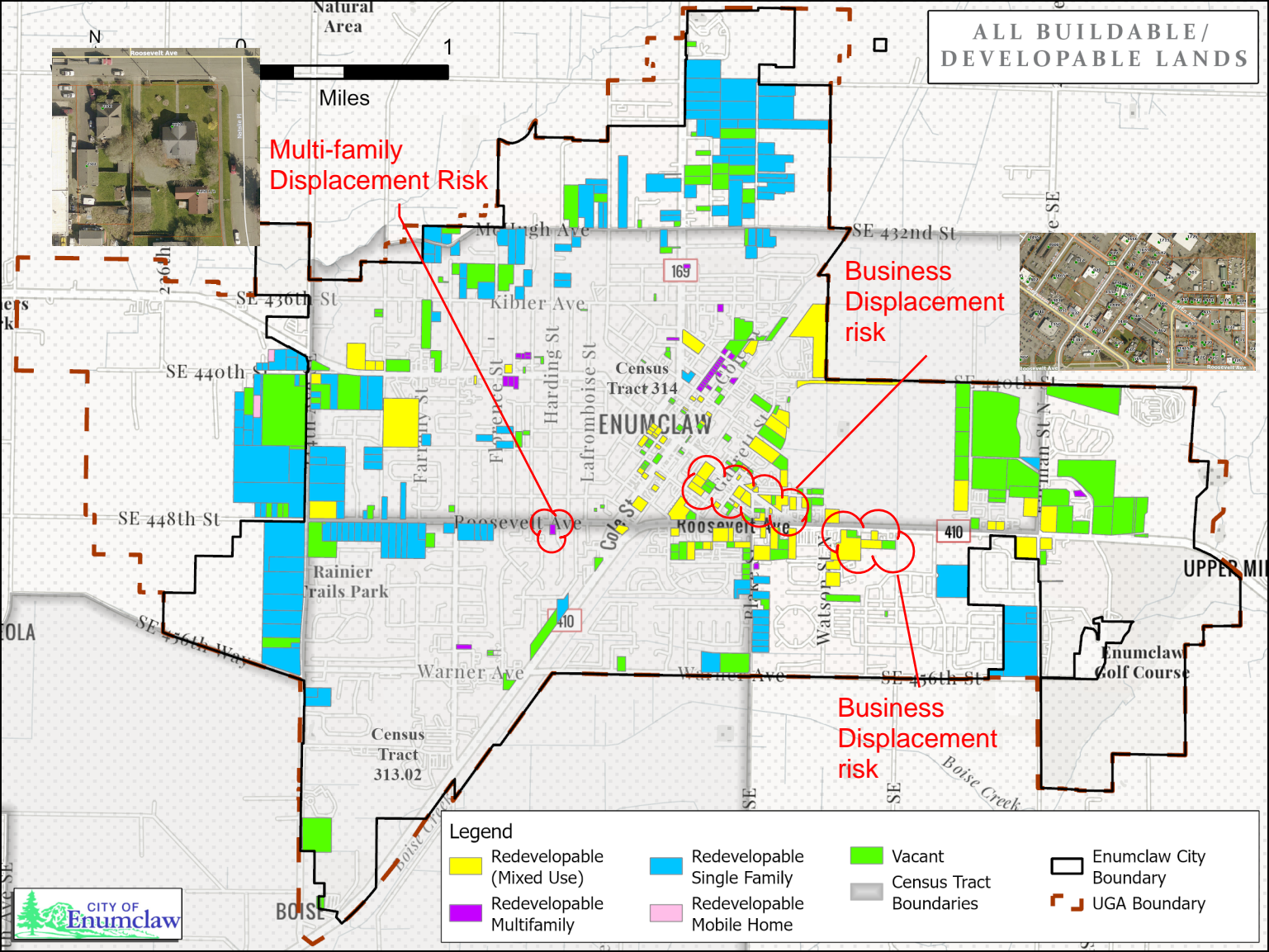
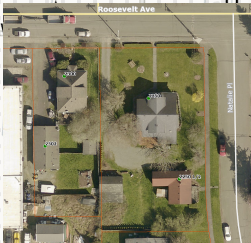
1

Miles

**Multi-family Displacement Risk**

**Business Displacement risk**

**Business Displacement risk**



**Legend**

- Redevelopable (Mixed Use)
- Redevelopable Single Family
- Vacant
- Census Tract Boundaries
- Redevelopable Multifamily
- Redevelopable Mobile Home
- Enumclaw City Boundary
- UGA Boundary



## **Appendix B**

### **Land Capacity Analysis and Adequate Provision to Accommodate All Housing Needs**



**REVIEW DRAFT**

**April 2024**

**Appendix B**

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## Appendix B

### 1. Introduction

The Washington State Growth Management Act (GMA) requires that the City's Comprehensive plan to include a Housing Element that identifies that the City has sufficient capacity of land to accommodate its projected housing needs during the Comprehensive Plan's planning period (RCW 36.70A.070(2)(c)). House Bill 1220 amended the GMA to require the City's housing element to include special consideration for the following housing needs:

- Housing for moderate, low, very low, and extremely low-income households;
- A mixture of housing types, including a special consideration of duplexes, triplexes and townhomes;
- emergency housing and emergency shelters; and
- permanent supportive housing.

House Bill 1220 also added an additional requirement for the City's housing element to make adequate provisions for existing and projected needs of all economic segments of the community, including (RCW 36.70A.070(2)(d)):

- Incorporating consideration for low, very low, extremely low, and moderate-income households;
- Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations;
- Consideration of housing locations in relation to employment location; and
- Consideration of the role of accessory dwelling units in meeting housing needs;

The purpose of this report is to determine if the City has sufficient capacity of land to accommodate its projected housing targets for 2044 and to evaluate the City's current development standards, processes, and available land to determine if there are any barriers to the construction of certain housing types. This report uses the Washington State's Department of Commerce "Guidance for Evaluating Land Capacity to Meet All Housing Needs" and "Guidance for Making Adequate Provisions to Accommodate All Housing Needs" documents as resource for the analysis.

### 2. Land Capacity Analysis Results

Appendix 1 provided the methodology and results of the City's Land Capacity Analysis (LCA). The following provides an analysis of the results of the LCA and determines if the City has sufficient capacity of land to accommodate its projected housing targets for 2044.

#### 2.2 Land Capacity Analysis Results

The results of the LCA (Table 1) identify that City has a net capacity for 2017 new residential housing units and that all of the City's residential zoning districts have capacity for new housing units. The residential zone with the greatest capacity for new housing units is R-2, which allows for detached single family home. The R-4 zone, which allows a maximum density of 1 dwelling unit per 2,900 square feet and for multi-unit housing types (low-rise apartment, townhomes, duplexes, triplexes, etc.), had the second most capacity for new housing units (559 units).

The LCA included the projected residential capacity for the CB-1, CB-2, and GO zonings districts because portions of those zones are located in the City's Mixed-Use Overlay. The LCA, however, included an assumption that very little new residential development would occur in these zones based on past development trends. Due to including this assumption, the LCA resulted in only a net capacity of 5 new housing units for the CB-1, CB-2 and GO zones.

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### 2.3 Accessory Dwelling Units

Accessory dwelling units (ADU) were not included in the LCA due to past construction trends. For example, as shown in Table 2, only 7 ADUs were constructed between 2018 and 2023. The City recognizes that ADUs could provide new housing units that are affordable to households with an annual income that is between 30% and 100% of the City's median annual income, however due to pasted building trends, ADUs were not considered a reliable source of new housing units.

Year	ADU Constructed
2018	2
2019	0
2020	0
2021	2
2022	3
Total	7
Annual Average Production	1.4

As part of the City's public outreach for the Comprehensive Plan Update the City hosted a Housing Open House and Housing Survey, where participants were asked about ADUs. Participants showed interested in detached ADUs and how they could be a possible option for new housing in the city, however, many participants identified the cost to construct a detached ADU as the limiting factor to why more have not been constructed. To address the comments from the input received from the public the City should include policies in the Housing Element, which reduce the cost to construct an ADU, like reducing impact fees and utility connection fees, to reduce the barrier that cost contributes to the construction of ADUs.

**Appendix B**

<b>Table 1: Residential Zones Land Capacity Analysis (LCA)</b>									
<b>Zone</b>	<b>Gross Developable Land (acre)</b>		<b>Infrastructure/Land Availability Deduction Factor</b>	<b>Net Developable Land (acres)</b>		<b>Planned Density (units/acre)</b>	<b>Gross Residential Capacity (units)</b>	<b>Pipeline + Units building between Jan 2019-May 2023</b>	<b>Net Residential Capacity (Units)</b>
R-1 Low Density Single-Family Residential District	Vacant	2.49	15%	2.1	16	2.902	47	0	47
	Redevelopable	18.71	25%	14					
R-2 Moderate Density Single-Family Residential District	Vacant	19.65	15%	16.7	102	6.5	477	451	928
	Redevelopable	113.18	25%	84.9					
R-3 Mixed Residential District	Vacant	0.13	15%	0.1	2.9	6.48	19	26	45
	Redevelopable	3.68	25%	2.8					
R-4 Multifamily Residential District	Vacant	15.83	15%	13.5	18	15.013	277	282	559
	Redevelopable	6.65	25%	5					
PUD Planned Unit Development	Vacant	0.11	15%	0.1	4.6	6.8	32	262	294
	Redevelopable	6.07	25%	4.6					
RMHP Residential Manufactured Home Park	Vacant	0.85	15%	0.7	0.7	7.023	5	133	138
	Redevelopable	0.00	25%	0					
CB-1 Central Business District (Mixed Use)	Vacant	1.36	15%	1.2	4.7	0.9	4	0	4
	Redevelopable	4.67	25%	3.5					
CB-2 Central Business District (Mixed Use)	Vacant	1.07	15%	0.9	2	0.9	2	0	2
	Redevelopable	1.45	25%	1.1					
GO General Office (Mixed Use)	Vacant	12.07	15%	10.3	20	0	0	0	0
	Redevelopable	13.35	25%	10					

### 3. Planning For Income Segments

HB 1220 amended the Growth Management Act to require the City’s Housing Element to include consideration for the following housing needs:

- Moderate, low, very low, and extremely low-income households;
- Permanent supportive housing;
- Emergency housing and emergency shelters; and
- Duplexes, triplexes and townhomes.

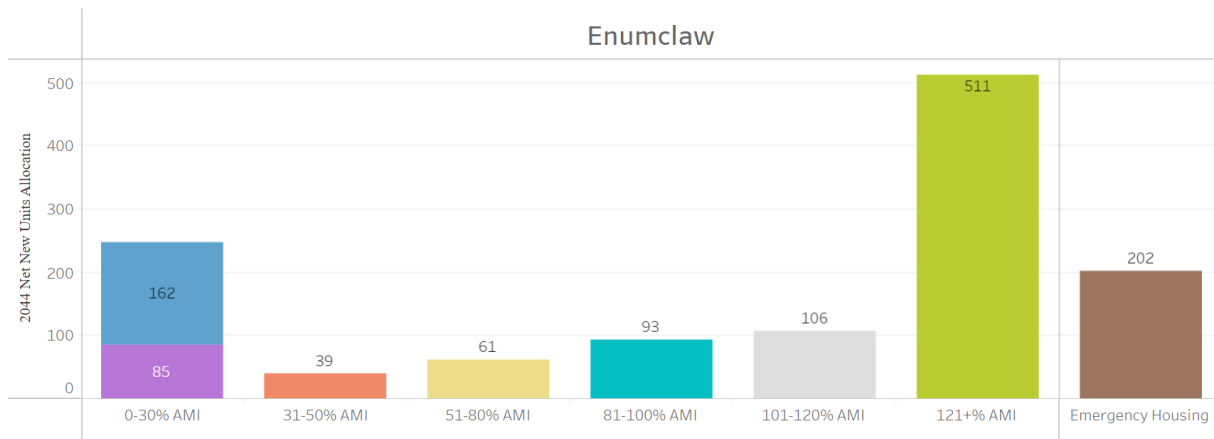
To determine if the City has land with adequate capacity to accommodate its housing targets for all economic segments and special housing needs, the following analysis was used.

#### 3.1 Housing Growth Targets

As required by the Growth Management Act, King County provided the City of Enumclaw and the other jurisdictions in the county with future projected housing targets for new housing units between 2019 and 2044. The housing targets were split up by new housing units that are affordable to households making a certain percentage of the annual median income (AMI). The purpose for categorizing the new housing units into household economic segments was to ensure that the jurisdictions in the County are planning for new housing units for household that have a moderate (81-100% AMI), low (51-80% AMI), very low (31-50% AMI), and extremely low (0-30% AMI) annual income. The City’s future housing targets also included targets for future emergency housing beds.

Figure 1 provides the City’s housing targets for 2044. As shown, the City has a total housing target of 1,057 new housing units and 202 emergency housing beds. The economic segment with the largest housing target is for high income households with an annual income of 121+% of the City AMI. The City’s second highest housing target is for housing units that make less than 30% of the City’s AMI. This means that the city will need both new detached single-family homes and low-rise apartment because households making more than 121% of the City’s median income can afford to buy detached single-family homes and households that make less than 30% of the City AMI can typically only afford to rent a low-rise apartment unit.

Figure 1: City of Enumclaw Hight Targets 2019-2044



Source: King County Jurisdictional Housing Needs Allocations, 2023

## Appendix B

### 3.1 Zoning Categories

The first step in determining if the City has enough land with capacity to accommodate its housing targets for moderate, low, very low, and extremely low-income households, was to place the allowed housing types in the City into zoning categories (Table 3). Next an assumed affordability level was assigned to each zoning category based on the lowest potential annual income a household would need to afford the housing types in the zoning category. When determining the lowest potential income needed to afford a housing type in each zoning category, the affordability of the housing type at market rate or with subsidies (government assistance) was considered.

Table 3: Zoning Categories				
Zoning Category	Typical Housing Types Allowed	Lowest Potential Income Level Served*		Assumed Affordability Level for Capacity Analysis
		Market Rate	With Subsidies	
Low Density	Detached single-family house on large lot (>6,200 sq ft)	Higher income (>121% AMI)	Not typically feasible	Higer Income (>121% AMI)
Moderate Density	Detached single-family house on small lot (>6,200 sq ft), townhome, duplex, triplex, quadplex, cottage	Moderate income (81-120% AMI)	Not typically feasible	Moderate Income (81-120% AMI)
Low-Rise	walk-up apartments, condominiums (2-3 stories)	Low income (>51-80% AMI)	Very low income (0-50% AMI)	Low Income (0-80% AMI) and PHS
Manufacture Home Park	manufactured home	Low income (>51-80% AMI)	Very low income (0-50% AMI)	Low Income (0-80% AMI)

\* Assumed affordability levels were identified using the Washington State Department of Commerce "Guidance for Evaluating Land Capacity to Meet All Housing Needs", 2023

### 3.2 Applying Zoning Districts to Zoning Categories

The next step was to determine which of the City's zoning district allowed the housing types in each zoning category (Table 4).

Table 4: Zoning Categories		
Zoning Category	Typical Housing Types Allowed	Zoning District
Low Density	Detached single-family house on large lot (>6,200 sq ft)	PUD, R-1, R-2, R-3
Moderate Density	Detached single-family house on small lot (>6,200 sq ft), townhome, duplex, triplex, quadplex, cottage	CB-1, CB-2, R-3, R-4
Low-Rise	walk-up apartments, condominiums (2-3 stories)	CB-1, CB-2, R-4

## Appendix B

Table 4: Zoning Categories		
Zoning Category	Typical Housing Types Allowed	Zoning District
Manufacture Home Park	manufactured home	RMHP

### 3.3 Capacity By Household Income Segment

The third step was to apply the results of the land capacity analysis to each economic segment. As provided in “Methods and Assumptions” section in [Section 6](#), each zoning district’s capacity was allocated to each economic segment bases on an assumed allocation percentage.

The results of this allocation identified that the City has enough capacity to facilitate its housing growth targets for households in all economic segments besides households with an extremely low income (0-30% AMI).

Table 5: New Housing Capacity By Household Income Bracket							
Household Income Segment	Income Bracket	Affordable Housing Types	Zones Housing Types Allowed in	Zone Category	Project Housing Need	Total Capacity + Pipeline Allocated	Surplus/(Deficit)
Extremely Low Income	0-30% AMI	Low-rise apartment/condo	R-4	Low-rise	247	209	(38)
		Manufactured home	RMHP	Manufactured home			
Very Low Income	31-50% AMI	Low-rise apartment/condo	R-4	Low-rise	39	209	170
		Manufactured home	RMHP	Manufactured home			
Low Income	51-80% AMI	Low-rise apartment	R-4	Low-rise	61	141	80
		Mixed Use Apartment/Condo	CB-1, CB2				
Moderate Income	81-100% AMI	Mixed Use Apartment/Condo	CB-1, CB2	Moderate Density	93	152	59
		Duplex, Triplex, Quadplex	R-3 (Duplex only), R-4 (All), PUD (All)				
		Townhome	R-4				
	Cottage	R-4					
	101-120% AMI	Mixed Use Apartment/Condo	CB-1, CB2	Moderate Density	106	161	55
		Duplex	R-3, PUD				

**Appendix B**

<b>Table 5: New Housing Capacity By Household Income Bracket</b>							
<b>Household Income Segment</b>	<b>Income Bracket</b>	<b>Affordable Housing Types</b>	<b>Zones Housing Types Allowed in</b>	<b>Zone Category</b>	<b>Project Housing Need</b>	<b>Total Capacity + Pipeline Allocated</b>	<b>Surplus/(Deficit)</b>
		Detached single-family on small lots	R-3, PUD				
High Income	>121% AMI	Detached single-family on large lots	R-1, R-2, R-3, PUD	Low Density	511	1144	633

3.4 Capacity by Zoning Category

The final step was aggregating the city’s new housing unit capacity by zoned category (Table 6). This analysis is important because it can be used to determine if a housing unit defect for households in one economic segment can be accommodated by a surplus in other economic segments.

<b>Table 6: Zoning Category Capacity</b>					
<b>Household Income Segment</b>	<b>Income Level</b>	<b>Zone Category</b>	<b>Projected Housing Need</b>	<b>Capacity</b>	<b>Surplus/(Deficit)</b>
Extremely Low-Income	0-30% AMI	Low rise/ Manufactured Home park	347	559	212
Very Low-Income	31-50% AMI				
Low-Income	51-80% AMI				
Moderate Income	81-100% AMI	Moderate density	199	313	114
	101-120% AMI				
High Income	>121% AMI	Low Density	511	1,144	633
	<b>Total</b>		<b>1,057</b>	<b>2,016</b>	<b>959</b>

As provided in Table 6, the city has enough capacity to accommodate its projected housing targets for moderate, low, very low, and extremely low-income households. The deficit identified in table 5 for new housing units available to households with an extremely low annual income (0-30% AMI), can be accommodated by the surplus in housing units that are available to households with a very low and low annual income. This is possible because the low, very low and extremely low-income economic segments are served by the low rise and manufactured home park categories and the same types of housing units can be affordable to each household economic segment. This means that the City should include goals and policies in the Housing Element that support subsidies or encourage reducing that construction cost of low-rise housing units so they can be affordable to a household with an extremely low annual income (0-30% AMI).

## Appendix B

### 4. Emergency Housing

Enumclaw’s current city code does not specify rules regarding the spacing, intensity, or locations for Permanent Supportive and Emergency Housing. In anticipation of future regulations, we’ve updated our Land Capacity Analysis to reflect potential locations for Emergency Housing, specifically in zones where hotels are currently allowed: HCB, CB1, and CB2.

#### Goal

The analysis evaluates the city's capacity to provide 202 emergency housing beds, the target set by the County.

#### Methodology

Using the Department of Commerce's approach, we examined several factors to estimate the city's capacity for emergency housing. The analysis included:

- **Buffer Distances:** We explored how the required distance between emergency housing facilities impacts capacity, comparing scenarios with 0.5-mile and 0.25-mile buffers.
- **Bed Count Estimation:** The City does not currently have any hotel density standards or any comparable shelters or service centers to create an assumed density. So, the analysis assessed capacity using the following two methods.
  - A fixed maximum of 40 beds per facility.
  - Assuming 30% of a parcel's area could be used for living quarters and requiring at least 400 square feet per bed.

#### Results:

The quarter-mile buffer scenario identified six parcels suitable for emergency housing. The half-mile buffer scenario identified three parcels suitable for emergency housing. The following table shows the resulting capacity under each scenario based on the two different methods of estimating bed capacity. Under the quarter-mile buffer scenario, the City can anticipate meeting its emergency housing capacity. However, the analysis found insufficient capacity under the 0.5-mile buffer scenario.

	0.25-Mile Buffer	0.5-Mile Buffer
<b>Max bed occupancy method</b> (40 beds/site)	240 (38 bed surplus)	120 (82 bed deficit)
<b>Square footage method</b> (400 sf/bed with 30% of each parcel area being useable for living quarters)	202 (0 beds needed)	127 (75 bed deficit)

The following table includes a summary of the analysis parcels and their square footage.

Analysis Parcel	Buffer Scenario	Site Area (sf)	Assumed Housing Quarter Area (30% of site)	Square Foot Method (400sf/bed)	Max Occupancy Method (beds)
1	0.25 & 0.5 mile	90,261	27,078	68	40
2	0.25 & 0.5 mile	44,567	13,370	33	40
3	0.25 & 0.5 mile	35,091	10,527	26	40
4	0.25 mile only	58,575	17,573	44	40
5	0.25 mile only	22,591	6,777	17	40

## Appendix B

6	0.25 mile only	18,056	5,417	14	40
<b>Total:</b>		<b>269,142</b>	<b>80,743</b>	<b>202</b>	<b>240</b>

### 5. Adequate Provisions

RCW 36.70A.070(2)(d) requires a Housing Element to “make adequate provisions for existing and projected housing needs of all economic segments of the community, including:

- i. Incorporating consideration of low, very low, extremely low, and moderate income households
- ii. Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations.
- iii. Consideration of housing locations in relation to employment locations; and
- iv. Consideration of the role of accessory dwelling units in meeting housing needs.”

To determine if adequate provisions are being made for all economic segments and housing types, the following process was followed.

#### 5.1 Housing Production Trends and Barriers

Table 7 uses past building trends as an indicator to identify if there are protentional barriers to the production of housing that is affordable to households in different economic segments. The analysis identifies that there are no barriers to the production of housing types that are affordable to households that make more than 120% of the city’s median annual income and there are barriers in the production in housing types that are affordable to households making less than 120% of the city’s median income. This determination was made because historically only detached single-family homes have been constructed in the city and there has been no construction of middle housing types (duplexes, triplexes, fourplexes, townhomes, etc.) and low-rise apartments.

Household Income Segment	Income Level (%AMI)	Projected Housing Need (2018-2044)	Zone Category	Aggregated Housing Need (units)	Annual Unit	Historic Average Annual Unit Production*	Is there a Barrier to Sufficient Production?
Extremely Low-Income	0-30% AMI	162	Low rise/ Manufactured Home park	347	13	9 Manufactured Homes 0 Low-Rise	Yes
	0-30% AMI PSH	85					
Very Low-Income	31-50% AMI	39					
Low-Income	51-80% AMI	61					
Moderate Income	81-100% AMI	93	Moderate Density	199	8	0	Yes

## Appendix B

Table 7: Housing Production Barriers							
Household Income Segment	Income Level (%AMI)	Projected Housing Need (2018-2044)	Zone Category	Aggregated Housing Need (units)	Annual Unit	Historic Average Annual Unit Production*	Is their a Barrier to Sufficient Production?
	101-120% AMI	106					
High Income	>121% AMI	511	Low Density	511	20	133	No
	Total	1057					

### 5.2 Barrier Analysis

To determine if there are barriers to the production of housing types that are affordable to households making less than 120% of the city’s median household income, further review of the City’s development code, permitting process and other constraints is necessary. Appendix 2 provides barrier review tables for moderate density, low-rise, ADU, and emergency housing construction. The tables specifically determine if there are barriers based on evidence collected from public outreach and from city staff institutional knowledge, and then identifies actions that the City could consider addressing the barriers.

### 5.4 Housing to Employment

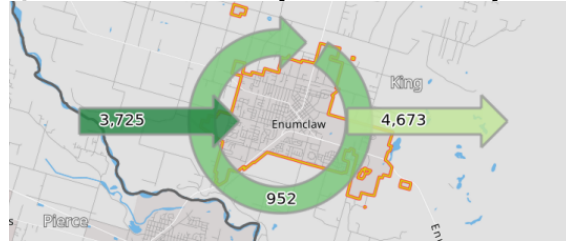
When reviewing housing and determining if the City is making adequate provisions for existing and projected housing needs for households in all economic segments of the community, it is important to take employment into account. Housing and employment are closely related because how much a household makes determines they type of housing they can afford and the type of services that they will need to travel to and from work.

The first consideration when reviewing employment and housing is the location of the employment centers and the housing that is located near those centers. Table 8 identifies three employment centers in the City and provides a description of the jobs within the center and the housing that surround it. Generally speaking, the city is small enough that an employee can walk to each employment center from anywhere in the City, however, special review in the Comprehensive Plan’s transportation element should take place to determine if there are safe walking and biking conditions for employees to get to these employment centers.

Table 8: Employment Centers		
Center Location	Employment Types	Surrounding Housing
Downtown (CB-1 and CB-2 zoning districts)	Retail, restaurants, professional office space	Detached single family homes, duplexes, triplexes, four-plexes, townhomes, low-rise apartments
Highway Community Business Zone along State Route 410 (Roosevelt Ave)	Retail, restaurants, automotive services	Detached single family homes, low-rise apartments
Light Industrial zone	Manufacturing, construction services, automotive services	Detached single family homes, duplexes, triplexes, four-plexes, townhomes, low-rise apartments

## Appendix B

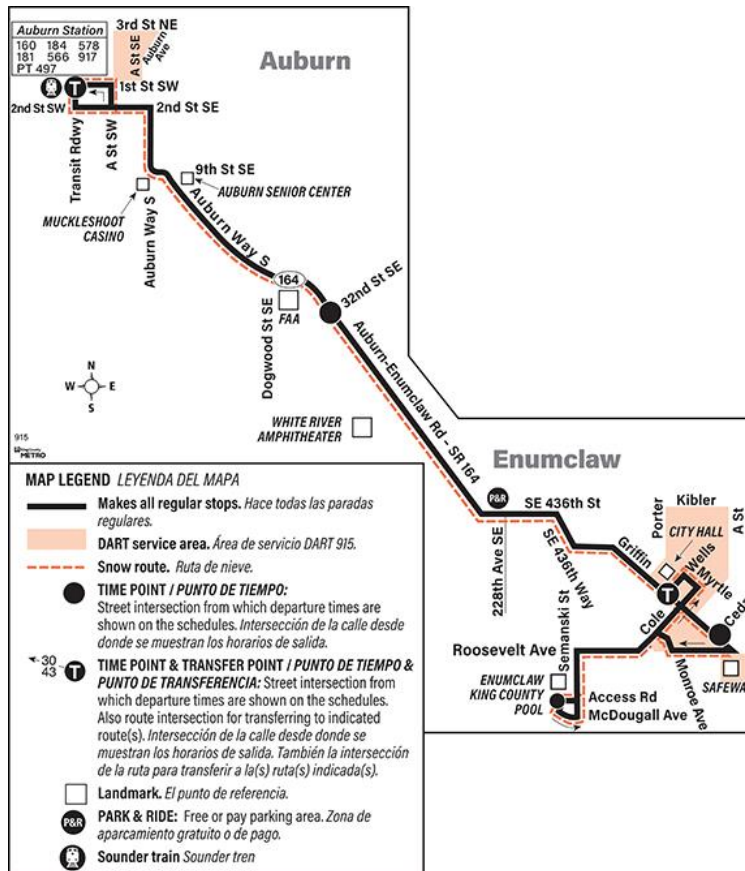
**Figure 2 Inflow/Outflow of Primary Jobs in the City of Enumclaw, 2020**



Source: United States Census Bureau, OnTheMap, 2020

The next consideration is employment centers outside of the City. As shown in figure 2, in 2020 most of the City's employed residents will work at jobs that are outside of the City (4,673 residents). Households making above the City's AMI can afford to drive to work, however, for households making less than the City's AMI, public transit may be required. The City has one public transit route provided by King County Metro (figure 3), which travels between the City and to Auburn Station in the City of Auburn, where riders can transfer to busses and trains that can transport them south to Tacoma and north to Seattle. Most of the land that surrounds the bus route is already developed with detached single-family homes, however due to the City's small size, residents living in more dense housing types can comfortably walk or bike to a bus stop.

**Figure 3: Route Map – King County Metro Route 915**



Source: King County Metro, 2023

**Appendix B**

**5.5 Adequate Provisions Checklist**

**Table 1: Moderate Density Housing Barrier Review Checklist**

Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
<b>Development Regulations</b>			
Unclear development regulations	Yes/No	<ul style="list-style-type: none"> <li>• EMC 18.05.020(A) permits cottage homes in all residential zones, upon approval of an innovative cottage demonstration project per EMC 19.46, however, EMC 19.46 does not exist. This means that the cottage requirements in EMC 18.06.130 and EMC 19.40 Article III would apply and both code provisions only allow cottage homes in the R-4 zone.</li> <li>• EMC 18.06.130(C) provides development standards for zero lot line developments in the R-4 zone, which treat zero-lot line developments different than if the same housing type was proposed on one lot. For example, EMC 18.06.130(C) requires that an interior townhome lot have a minimum street frontage of 30-feet, however if a townhome building was constructed on a single lot, then an interior unit does not have a minimum street frontage. By having strict development standards for zero lot line</li> </ul>	<ul style="list-style-type: none"> <li>• The City should consider revising EMC 18.05.020(A), add EMC 19.46, or apply the standards in EMC 18.06.130 and EMC 19.40 Article III to all zones that cottages are a permitted use.</li> <li>• The City should consider having similar development standards for zero-lot line developments and multi-unit developments on one lot.</li> </ul>

**Appendix B**

**Table 1: Moderate Density Housing Barrier Review Checklist**

Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
		developments and not for developments with multi-unit buildings on one lot, it acts as a barrier for zero lot line developments.	
Prohibiting some moderate density housing types, such as: <ul style="list-style-type: none"> <li>• Duplexes</li> <li>• Triplexes</li> <li>• Four/five/six-plexes</li> <li>• Townhomes</li> <li>• Cottage housing</li> <li>• Live-work units</li> <li>• Manufactured homes</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• All the listed housing types are allowed in the R-4 and PUD zones.</li> <li>• in the R-2 zone, duplexes are a conditional use (EMC 18.05.020(A)), which has deterred new duplex construction due to the additional permitting. Also, in the R-2 zone, duplex properties have a required separation of 300-feet (EMC 19.40.110(J)). In the past, the separation requirement has made it not possible for new developments to have more than one duplex and has limited duplexes as an option for infill development on existing lots.</li> </ul>	<ul style="list-style-type: none"> <li>• Consider updates to its Residential Land Use Matrix (EMC 18.05.020(A)) to allow triplexes, four/five/six-plexes, townhomes, and live-work units in more than just the R-4 and PUD zoning districts.</li> <li>• Consider allowing duplexes as a permitted use in all residential zones.</li> <li>• Consider removing the 300-foot separation requirement for duplex properties in the R-2 zone (EMC 19.40.110(J)).</li> </ul>
High minimum lot size	Yes	<ul style="list-style-type: none"> <li>• In the R-3 zone duplexes are required to have a minimum lot size of 12,400 square feet (2 times the minimum lot size in the R-3 zone; EMC 18.05.020(B)(3)). This could</li> </ul>	<ul style="list-style-type: none"> <li>• Establish comp plan goals and policies to consider smaller lot sizes through development regulations.</li> </ul>

**Appendix B**

**Table 1: Moderate Density Housing Barrier Review Checklist**

Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
		<p>result in a lot that is too large and not economical for duplex buildings with smaller units. This requirement also, limits fee-simple duplexes, where each unit is on its own lot.</p> <ul style="list-style-type: none"> <li>• EMC 18.06.130(C), provides minimum lot sizes for zero lot line developments, developers have not provided any comments on these standards, however, the minimum lot sizes could be too large for some housing products. For example, EMC 18.06.130(C) requires townhomes in a zero-lot line development to have a minimum lot area of 3,000 square feet, which could be too large for an interior townhome unit lot.</li> </ul>	<ul style="list-style-type: none"> <li>• Consider reducing the minimum lot size for duplexes in the R-3 zone (EMC 18.05.020(B)(3)).</li> <li>• Consider updating the development standards to allow for lot sizes for fee simple (zero lot line) duplexes.</li> <li>• Consider treating zero lot line projects with moderate density housing types the same as similar project where the housing types are proposed on one lot.</li> </ul>
Low maximum densities	No	<ul style="list-style-type: none"> <li>• Developers have not identified the City's current maximum densities for moderate density housing types as a barrier to why these housing types are not being constructed.</li> </ul>	
Low maximum building heights	No	<ul style="list-style-type: none"> <li>• Developers have not identified the City's current maximum building height for moderate density housing types as a</li> </ul>	

**Appendix B**

**Table 1: Moderate Density Housing Barrier Review Checklist**

Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
		barrier to why these housing types are not being constructed.	
Large setback requirements	No	<ul style="list-style-type: none"> <li>• Developers have not identified the City’s current setbacks for moderate density housing types as a barrier to why these housing types are not being constructed.</li> <li>• EMC 19.40.110(A), 19.40.140(A), and EMC 19.40.170(A), require that duplexes, cottages, and townhomes that are not fee simple, comply with the underlying zones setbacks. However, EMC 18.06.13(C) provides minimum setbacks for zero lot line (fee simple) duplex, cottage, and townhome projects that are less than the setbacks for the underlying zoning district.</li> </ul>	<ul style="list-style-type: none"> <li>• Could consider treating zero lot line projects with moderate density housing types the same as similar project where the housing types are proposed on one lot.</li> </ul>
High off-street parking requirements	No	<ul style="list-style-type: none"> <li>• Developers have not identified the City’s parking requirements for moderate density housing types as a barrier to why these housing types are not being constructed.</li> <li>• 1.35 spaces per unit per EMC 19.40.040</li> </ul>	<ul style="list-style-type: none"> <li>• No action needed, however, Comprehensive Plan policy H-2.6 was updated to encourage the City to consider a parking reduction as an incentive for new affordable housing units.</li> </ul>

## Appendix B

<b>Table 1: Moderate Density Housing Barrier Review Checklist</b>			
Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
Lack of alignment between building codes and development codes	No	<ul style="list-style-type: none"> <li>Developers have not identified this as a barrier to why these housing types are not being constructed.</li> </ul>	
Other (for example: complex design standards, maximum impervious surface cover, tree retention regulations, historic preservation requirements)	No.		
<b>Process Obstacles</b>			
Conditional use permit process	Yes.	<ul style="list-style-type: none"> <li>A conditional use permit is required for duplexes in the R-2 zone, and for duplexes in the R-3 zone if the duplex is on a lot that is less than 12,400 square feet. Staff has observed this as being a barrier to the construction of duplexes in the R-2 and R-3 zone because developers don't want to go through the conditional use process.</li> </ul>	<ul style="list-style-type: none"> <li>Consider allowing duplexes in the R-2 and R-3 zones.</li> <li>New Comprehensive Plan policy H-3.5.</li> </ul>
Design review	Yes	<ul style="list-style-type: none"> <li>EMC 19.40 provides design standards for moderate density developments and City staff reviews proposed projects for consistency with the code provision.</li> <li>EMC 19.40.050(F)(2)(a), requires the Design Review</li> </ul>	<ul style="list-style-type: none"> <li>The City should consider removing the requirement that the design review board needs to approve light plans in EMC 19.40.050(F)(2)(a).</li> <li>Streamline requirements</li> </ul>

## Appendix B

**Table 1: Moderate Density Housing Barrier Review Checklist**

Table 1: Moderate Density Housing Barrier Review Checklist			
Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
		<p>Board approval of a moderate density housing project's outdoor lighting plan. City Staff believe that this is a barrier to the construction of moderate housing types because the Design Review Board does not have to review any other part of a moderate density housing project and it ultimately adds time and an additional fee to the project.</p> <ul style="list-style-type: none"> <li>• Design Standards for SFR/Mixed Use/Duplex and Cottage Housing</li> </ul>	
Lack of clear and accessible information about process and fee	No.	<ul style="list-style-type: none"> <li>• The City follows a standard review process and fee structure for building permits. For Land Use Permits, the permit process is outlined in EMC Title 15. All applications and the current year's fee schedule are posted on the City's website.</li> </ul>	
Permit fees, impact fees and utility connection fees	No	<ul style="list-style-type: none"> <li>• Fees are significantly lower than most communities, Code does treat Multifamily different from Single-family</li> </ul>	<ul style="list-style-type: none"> <li>• The City could consider providing a discount/fee reduction for the construction of affordable housing.</li> <li>• New Comprehensive Plan policy H-2.10.</li> </ul>
Processing times and staffing challenges	No.	<ul style="list-style-type: none"> <li>• The City has relatively quick review timelines and has online</li> </ul>	

**Appendix B**

<b>Table 1: Moderate Density Housing Barrier Review Checklist</b>			
<b>Barrier</b>	<b>Is the barrier likely to affect housing production? (yes or no)</b>	<b>Why or Why not? Provide evidence.</b>	<b>Actions needed to address barriers</b>
		<ul style="list-style-type: none"> <li>• permitting and electronic plan review software.</li> </ul>	
SEPA process	Yes/No	<ul style="list-style-type: none"> <li>• Maximum Exemption Levels not adopted.</li> <li>• SEPA is taken care of concurrently with a project's preliminary plat land disturbing activities application, or building permit application review and a determination is issued before or with the permit decision.</li> <li>• The City has only adopted the minimum minor development exemption for new construction (WAC 197-11-800(1)(b)(ii)).</li> </ul>	<ul style="list-style-type: none"> <li>• The City could consider increasing its SEPA minor development exemption (WAC 197-11-800(1)(C)).</li> <li>• New Comprehensive Plan policy H-2.11</li> </ul>
<b>Limited Land Availability and Environmental Constraints</b>			
Lack of large parcels for infill development	Yes.	<ul style="list-style-type: none"> <li>• By restricting moderate density housing types to the R-4 zone and PUD zone, it creates competition between the other housing types in those zones that may be more profitable.</li> </ul>	<ul style="list-style-type: none"> <li>• The City could consider allowing moderate density housing types in other residential zoning districts.</li> <li>• Identify grant and funding opportunities to implement infrastructure improvements to support housing in buildable lands.</li> </ul>
Environmental constraints	No	<ul style="list-style-type: none"> <li>• Generally, the City does not have many critical areas that would have an impact on housing capacity</li> </ul>	NA

**Appendix B**

<b>Table 2: Low-Rise Housing Barrier Review Checklist</b>			
<b>Barrier</b>	<b>Is the barrier likely to affect housing production? (yes or no)</b>	<b>Why or Why not? Provide evidence.</b>	<b>Actions needed to address barriers</b>
<b>Development Regulations</b>			
Unclear development regulations	No	<ul style="list-style-type: none"> <li>The City has specific development regulations and design standards for low-rise housing.</li> </ul>	NA
High minimum lot sizes	Yes	<ul style="list-style-type: none"> <li>Identified barrier in the 2023 Race and Disparate Impact Report (p. 4-3).</li> </ul>	<ul style="list-style-type: none"> <li>Explore opportunities for smaller homes on smaller lots.</li> </ul>
Low maximum densities or low maximum FAR	Yes.	<ul style="list-style-type: none"> <li>Developers have indicated that the allowed density for low-rise housing is below what surrounding jurisdiction have and the density makes it challenging to economically develop the required site improvements and amenities.</li> <li>Identified barrier in the 2023 Race and Disparate Impact Report (p. 4-3).</li> </ul>	<ul style="list-style-type: none"> <li>The City could consider increasing the maximum density in the R-4 zone. This could be through density incentives if the development includes a certain percentage of affordable housing.</li> <li>Consider a wider range of densities allowed to enable smaller homes on smaller lots.</li> </ul>
Low maximum building heights	Yes/No	<ul style="list-style-type: none"> <li>The maximum building height in the R-4 zone is 30-feet. Developers have provided input that a 30-foot tall low-rise building makes it challenging to construct a product with unit heights that are marketable.</li> </ul>	<ul style="list-style-type: none"> <li>The City could consider increasing the maximum building height in the R-4 zone, perhaps to 35 feet by right. This could be used as an incentive based on a certain percentage of affordable housing included in the project.</li> <li>New Comprehensive Plan policy H-2.6.</li> </ul>

## Appendix B

<b>Table 2: Low-Rise Housing Barrier Review Checklist</b>			
Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
Large setback requirements	No	<ul style="list-style-type: none"> <li>Setback requirement for low-rise projects have the same setbacks as other residential development types.</li> </ul>	NA
High off-street parking requirements	No	<ul style="list-style-type: none"> <li>There has been no evidence provided from developers or institutional knowledge that identifies that the off-street parking requirements are too high.</li> </ul>	NA
High impervious coverage limits	No	<ul style="list-style-type: none"> <li>No impervious limit. There is a max building coverage of 30% (EMC 18.06.030).</li> </ul>	<ul style="list-style-type: none"> <li>If smaller homes on smaller lots is implemented, consider increasing this limit to encourage more flexibility</li> </ul>
Lack of alignment between building and development codes	No	<ul style="list-style-type: none"> <li>Developers have not identified this as a barrier to why these housing types are not being constructed.</li> </ul>	NA
Other (for example: ground floor retail requirements, open space requirements, complex design standards, maximum impervious surface cover, tree retention regulations, historic preservation requirements)	Yes	<p>Roof pitch design regulations in EMC 19.12.075 was identified as a barrier in the 2023 Race and Disparate Impact Report (p. 4-3).</p>	<ul style="list-style-type: none"> <li>Consider relaxing roof design standards.</li> </ul>
<b>Process Obstacles</b>			
Conditional use permit process	No	<ul style="list-style-type: none"> <li>Low-rise projects are not a conditional use in any residential zone.</li> </ul>	NA
Design review	Yes/No	<ul style="list-style-type: none"> <li>Design review is required for the a low-rise project, but the review is done by city staff during the review of the</li> </ul>	<ul style="list-style-type: none"> <li>The City should consider removing the requirement that the design review board needs</li> </ul>

**Appendix B**

**Table 2: Low-Rise Housing Barrier Review Checklist**

Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
		<p>project’s Land Disturbing Activities application and Building Permit application.</p> <ul style="list-style-type: none"> <li>EMC 19.40.050(F)(2)(a), requires the Design Review Board approval of a low-rise housing project’s outdoor lighting plan. City Staff believe that this is a barrier to the construction of moderate housing types because the Design Review Board does not have to review any other part of a moderate density housing project and it ultimately adds time and an additional fee to the project.</li> </ul>	<p>to approve light plans in EMC 19.40.050(F)(2)(a).</p>
Lack of clear and accessible information about process and fees	No	<ul style="list-style-type: none"> <li>All applications and the city’s fee schedule are located on the City’s website. Staff also recommends a preapplication meeting for low-rise projects, where permitting process and fees are discussed with the developer.</li> </ul>	NA
Permit fees, impact fees and utility connection fees	Yes	<ul style="list-style-type: none"> <li>The City does not provide any discounts for the production of certain housing types or the production of housing types that are affordable to certain income brackets.</li> </ul>	<ul style="list-style-type: none"> <li>The City could consider providing a discount/fee reduction for the construction of affordable housing.</li> </ul>

**Appendix B**

<b>Table 2: Low-Rise Housing Barrier Review Checklist</b>			
<b>Barrier</b>	<b>Is the barrier likely to affect housing production? (yes or no)</b>	<b>Why or Why not? Provide evidence.</b>	<b>Actions needed to address barriers</b>
Process times and staffing challenges	No	<ul style="list-style-type: none"> <li>The City's permitting times are relatively low, and developers tell the City that our reviews take less than surrounding jurisdictions.</li> </ul>	
SEPA process	Yes/No	<ul style="list-style-type: none"> <li>SEPA is taken care of concurrently with a project's land disturbing activities application review and is issued prior to when the LDA is issued.</li> <li>The City has only adopts the minimum minor development exemption of the construction of multi-family developments (WAC 197-11-800(1)(b)(ii)).</li> </ul>	<ul style="list-style-type: none"> <li>The City could consider increasing its SEPA minor development exemption (WAC 197-11-800(1)(C)).</li> <li>New Comprehensive Plan policy H-2.11.</li> </ul>
<b>Limited Land Availability and Environmental Constraints</b>			
Lack of large parcels for infill development	No	<ul style="list-style-type: none"> <li>The City has vacant large lots available for the construction of low-rise developments.</li> </ul>	NA
Environmental constraints	No	<ul style="list-style-type: none"> <li>The land that is available to have low-rise development on it has minimal environmental constraints.</li> </ul>	NA

## Appendix B

**Table 3: Supplementary Barrier Review Checklist for PSH and Emergency Housing**

Table 3: Supplementary Barrier Review Checklist for PSH and Emergency Housing			
Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
<b>Development Regulations</b>			
Spacing requirements (for example, minimum distance from parks, schools or other emergency/PSH housing facilities) <sup>1</sup>	No	The adopted code is currently silent on emergency housing spacing requirements.	The City is currently updating PSH/emergency housing development regulations while being compliant with state law and ensuring adequate capacity.
Parking requirements	No	The adopted code is currently silent on emergency housing spacing requirements.	The City is currently updating PSH/emergency housing development regulations while being compliant with state law and ensuring adequate capacity. Parking requirements will be adopted with any code changes
On-site recreation and open space requirements	No	The adopted code is currently silent on emergency housing spacing requirements.	The City is currently updating PSH/emergency housing development regulations while being compliant with state law and ensuring adequate capacity.
Restrictions on support spaces, such as office space, within a transitional or PSH building in a residential zone	No	The adopted code is currently silent on emergency housing spacing requirements.	The City is currently updating PSH/emergency housing development regulations while being compliant with state law and ensuring adequate capacity.
Arbitrary limits on number of occupants (in conflict with RCW <a href="#">35A.21.314</a> )	No	The adopted code is currently silent on emergency housing spacing requirements. The propose code limits to a maximum number of occupants to 40.	The City is currently updating PSH/emergency housing development regulations while being compliant with state law and ensuring adequate capacity.

<sup>1</sup> Note that RCW 35A.21.430 expressly states requirements on occupancy, spacing, and intensity of use may not prevent the siting of a sufficient number of permanent supportive housing, transitional housing, indoor emergency housing or indoor emergency shelters necessary to accommodate each code city's projected need for such housing and shelter under RCW 36.70A.070(2)(a)(ii). The restrictions on these uses must be to protect public health and safety.

**Appendix B**

**Table 3: Supplementary Barrier Review Checklist for PSH and Emergency Housing**

Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
			Definitions of family will need to be amended.
Requirements for PSH or emergency housing that are different than the requirements imposed on housing developments generally (in conflict with <a href="#">RCW 36.130.020</a> )	No	The adopted code is currently silent on emergency housing spacing requirements.	The City is currently updating PSH/emergency housing development regulations while being compliant with state law and ensuring adequate capacity.
Other restrictions specific to emergency shelters, emergency housing, transitional housing and permanent supportive housing	No	The adopted code is currently silent on emergency housing spacing requirements.	The City is currently updating PSH/emergency housing development regulations while being compliant with state law and ensuring adequate capacity.

**Appendix B**

**Table 4: Accessory Dwelling Units Barrier Review Checklist**

Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
<b>Development Regulations</b>			
<p>Consistent with HB 1337 (2023)</p> <ul style="list-style-type: none"> <li>• Must allow two ADUs on each lot in urban growth areas;</li> <li>• May not require the owner to occupy the property, and may not prohibit sale as independent units, but may restrict the use of ADUs as short term rentals;</li> <li>• Must allow an ADU of at least 1,000 square feet;</li> <li>• Must set parking requirements based on distance from transit and lot size;</li> <li>• May not charge more than 50% of the impact fees charged for the principal unit;</li> <li>• Must permit ADUs in structures detached from the principal unit;</li> <li>• May not restrict roof heights of ADUs to less than 24 feet, unless that limitation applies to the principal unit;</li> <li>• May not impose setback requirements, yard coverage limits, tree retention mandates, restrictions on entry door locations, aesthetic requirements, or requirements for design review for ADUs that are more restrictive than those for principal units;</li> <li>• Must allow an ADUs on any lot that meets the minimum lot size required for the principal unit;</li> <li>• Must allow detached ADUs to be sited at a lot line if the lot line abuts a public alley, unless the city or county routinely plows snow on the public alley;</li> <li>• Must allow conversions from existing structures, even if they violate current code requirements for setbacks or lot coverage; and</li> <li>• May not require public street improvements as a condition of permitting ADUs.</li> </ul>	No	Addressed in EMC 19.34.070	None

## Appendix B

**Table 4: Accessory Dwelling Units Barrier Review Checklist**

Table 4: Accessory Dwelling Units Barrier Review Checklist			
Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
Unclear development regulations	No	EMC 19.34.080 regulates architectural design, but provides specific elements to maintain consistently with the principal use, including materials, colors, etc, rather than unclear regulations.	NA
Large setback requirements	No	ADU are subject to accessory structure setbacks.	NA
Prohibiting existing structures from being converted into ADUs	No	The City does not restrict existing structures from being converted into ADUs	NA
Off-street parking requirements	No	ADUs are required to have one off street parking space. Due to there not being a high intensity transit stop in the City, it is appropriate to require off street parking for ADUs.	NA
Other (for example: complex design standards, tree retention regulations, historic preservation requirements, open space requirements, etc.)	No	EMC 19.34.080 regulates architectural design, but only to maintain similar design as the existing, principal use.	NA
<b>Process Obstacles</b>			
Conditional use permit process	No	ADUs are allowed in all residential zones.	
Design review	No	Design review is not required for ADUs.	
Lack of clear and accessible information about process and fees	No	ADU permit fees are outlined within the Fee Resolution	
Permit fees, impact fees and utility connection fees	Yes	Impact fees and connections are proportionately scaled based on the proposed residential intensity and as required by law (50% of the SFR fee).	<ul style="list-style-type: none"> <li>• As required by House Bill 1337, the City will reduce the impact fees for ADUs to half of the impact fees for a new</li> </ul>

## Appendix B

Table 4: Accessory Dwelling Units Barrier Review Checklist			
Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
			detached single-family house by June 2025. <ul style="list-style-type: none"> <li>• New Comprehensive Plan policy H-2.10.</li> </ul>
Processing times and staffing challenges	No	The City's permitting times are relatively low, and developers tell the City that our reviews take less than surrounding jurisdictions.	NA

Table 5: Local option tools for addressing affordable housing funding gaps		
Local option tools for addressing affordable housing funding gaps*	Implementation status	Plans for implementation
Housing and related services sales tax ( <a href="#">RCW 82.14.530</a> )	Not implemented	No plans for implementation
Affordable housing property tax levy ( <a href="#">RCW 84.52.105</a> )	Not Implemented	No plans for implementation
REET 2 ( <a href="#">RCW 82.46.035</a> ) – GMA jurisdictions only and only available through 2025	Not implemented	No plans for implementation
Affordable Housing Sales Tax Credit ( <a href="#">RCW 82.14.540</a> ) – was only available to jurisdictions through July 2020	Implemented (EMC 3.50)	Already implemented

## Appendix B

**Table 5: Local option tools for addressing affordable housing funding gaps**

Local option tools for addressing affordable housing funding gaps*	Implementation status	Plans for implementation
Lodging Tax ( <a href="#">RCW 67.28.150</a> and <a href="#">RCW 67.28.160</a> ) to repay general obligation bonds or revenue bonds	Yes (EMC 3.06)	Does not repay general obligation bonds
Mental Illness and Drug Dependency Tax ( <a href="#">RCW 82.14.460</a> ) – jurisdictions with a population over 30,000	N/A	N/A
Donating surplus public lands for affordable housing projects ( <a href="#">RCW 39.33.015</a> )	Not implemented	No plans for implementation
Impact fee waivers for affordable housing projects ( <a href="#">RCW 82.02.060</a> )	Not implemented	No plans for implementation
Application fee waivers or other benefits for affordable housing projects ( <a href="#">RCW 36.70A.540</a> )	Not implemented	No plans for implementation
Multifamily Tax Exemption (MFTE) with affordable housing requirement ( <a href="#">RCW 84.14</a> )	Implemented (EMC 3.60)	Already implemented
General funds (including levy lid lifts to increase funds available)	Not Implemented	No plans for implementation

\* Some tools may be unavailable for certain jurisdictions. For example, only GMA jurisdictions can use REET 2, or the surrounding county may have already implemented the housing and related services sales tax. See MRSC’s summary of [Affordable Housing Funding Sources](#) for more details and the Association of Washington Cities (AWC)/MRSC booklet on [Homelessness & housing toolkit for cities](#) (2022).

## **6. Housing Needs and Land Capacity Analysis Methods and Results Memo**

*– Starts on the next page –*



# MEMORANDUM

**Date:** April 2024  
**To:** Chris Pasinetti, Community Development Director  
**From:** Eli Mulberry, Planner  
**Subject:** Housing Needs and Land Capacity Analysis Methods and Results

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## 1. Background

This memo discusses the results of the City of Enumclaw’s analysis of housing capacity, need, and surplus/deficits for planning year 2044. This work has been conducted according to 2021 Washington House Bill 1220, which updated the Growth Management Act (GMA). The new legislation requires that jurisdictions plan for very low-, low-, and moderate-income housing needs when conducting their Comprehensive Plan updates. Jurisdictions are required to demonstrate that land capacity exists in their Urban Growth Areas for housing types that meet these income needs. In other words, *do the current zoning and development regulations allow housing types and quantities that meet need by income bracket.* Whether development occurs to meet this need ultimately depends on private market trends.

The Department of Commerce provided a Housing for All Planning Tool (HAPT) for counties to project housing needs by income level, as a percentage of Area Median Income (AMI), for each jurisdiction. Enumclaw’s targets under this approach are summarized in the following:

**Exhibit 1 – Housing Need under HAPT for Enumclaw**

Housing Need Targets by income (HAPT)	2044 Net new need allocation (units)
0-30% AMI, Non-Permanent Supportive Housing (PSH)	162
0-30% AMI, Permanent Supportive Housing (PSH)	85
30-50% AMI	39
50-80% AMI	61
80-100% AMI	93
100-120% AMI	106
>120% AMI	511
<b>Total</b>	<b>1,057</b>
<i>Emergency housing (beds)</i>	202

This memo evaluates whether the housing need targets can be reasonably accommodated in the next 20 years under different policy scenarios. The following land use scenarios are tested:

- “No change” to current policies.
- Lot size reductions (smaller homes on smaller lots).
- A slight increase in density in the R-4 zone.

## 2. Methods and Assumptions

At its core, this process compares available land for housing against projected housing unit demand. If there is an excess, or surplus, of land, the current zoning policies suffice. However, if there is a shortage, the city needs to update its policies to meet projected housing demand.



This analysis used the following steps to find the surplus or deficit of housing units by income bracket:

1. **Determining housing unit capacity.** Housing capacity is determined using a Land Capacity / Buildable Lands analysis. Using GIS, this study identified vacant and redevelopable parcels. Critical areas and infrastructure limitations were then removed from these to find a total, buildable acreage by zone.<sup>1</sup> In addition to buildable lands, this analysis includes “pipeline” units. These are housing units that are undergoing the permit process but are not yet constructed. By combining the buildable capacity and the pipeline units, the analysis calculates the total unit capacity.
2. **Allocating capacity to income brackets.** To compare housing capacity against the designated housing need targets, jurisdictions must establish assumptions for each zone, specifying the income levels each zone’s housing can reasonably accommodate. These assumptions may be either “all or nothing”—if a zone only accommodates one income bracket—or based on allocation ratios if the zone provides housing across multiple income brackets.
3. **Evaluating allocated capacity against adopted housing targets.** This analysis then compares adopted housing targets against housing unit capacity allocated to each income bracket. If the capacity exceeds the need, current development regulations and policies will likely support the housing units needed. However, if there is a deficit, the jurisdiction will need to consider policy changes to meet the state statute.

To determine the number of units that can reasonably be accommodated under the land capacity, this analysis uses an assumed density, rather than the maximum zoned density. An assumed density considers the existing built density and likely density of further development. For example, if an area has a zoned density of 7 units per acre, but market trends show lower densities being built, a lower assumed density

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<sup>1</sup> Methods for this are consistent with Washington State’s Buildable Lands Guidelines (2018) and

would be more reasonable in capacity analysis. Using assumed density is consistent with the Department of Commerce’s Guidance on housing need and capacity.<sup>2</sup>

Under the Commerce guidance, to compare land capacity with housing need by income band, the assessment needs to create assumptions, based on existing housing diversity and local conditions, of what income levels the existing zones reasonably accommodate (see Exhibit 4 for the assumed densities used in the baseline, “no change” scenario).<sup>3</sup> For example, if a single-family residential zone has land values and home costs that would not be affordable to lower income brackets, the analysis allocates the capacity in that zone to higher income brackets.

The baseline assumptions used for the “no change” scenario of the analysis are established in Exhibit 2. Appendix A shows the full allocation ratio assumptions.

**Exhibit 2 – Assumed Zones Serving Income Levels: No Change**

Income Level	Zones Serving
0-30% AMI	R-4, RMHP
30-50% AMI	R-4, RMHP
50-80% AMI	CB1, CB2, R-4
80-100% AMI	CB1, CB2, R-3, R-4
100-120% AMI	CB1, CB2, PUD, R-3
>120% AMI	PUD, R-1, R-2, R-3

### 3. Housing Capacity Outputs and Pipeline Projects

Our analysis looked at the total land capacity together with known housing development underway (i.e. pipeline projects) to determine the total current residential capacity. Land capacity calculation differentiated buildable versus unbuildable areas by identifying vacant and redevelopable parcels while factoring in critical areas and infrastructure. Pipeline projects included projects completed since the buildable lands analysis had been completed, as well as projects anticipated through land use applications and permit approval processes. The residential capacity is identified in the following table, using the assumed density calculations in Section 2. The full acreage calculations can be seen in Appendix B.

**Exhibit 3 – Housing Capacity**

Zone	Gross Residential Capacity (units)	Pipeline + Recently Built (units)	Total
CB1 – Central Business 1	4	0	4
CB2 – Central Business 2	2	0	2
GO – General Office	0	0	0

<sup>2</sup> Department of Commerce. “Draft Guidance for Evaluating Land Capacity to Meet All Housing Needs.” Washington State Department of Commerce, 2022 <https://deptofcommerce.app.box.com/s/k14gbqe7z8d7ek6z8ibui79zb7bo9vpa>.

<sup>3</sup> Ibid.

Zone	Gross Residential Capacity (units)	Pipeline + Recently Built (units)	Total
GO-H – General Office Hospital	0	0	0
HCB – Highway and Community Business	0	0	0
NB – Neighborhood Business	0	0	0
PUD – Planned Unit Development	32	262	294
R-1 – Residential 1 (15,000 sq. ft.)	47	0	47
R-2 – Residential 2 (8,400 sq. ft.)	477	451	928
R-3 – Residential 3 (6,200 sq. ft.)	19	26	45
R-4 – Residential 4 (6,200 sq. ft.)	277	282	559
RMHP – Residential Mobile Home Park	5	133	138
<b>Total</b>	<b>862</b>	<b>1,154</b>	<b>2,016</b>

#### 4. No Change Scenario

The No Change scenario assumes that development regulations will not significantly change over the next 20 years. It also assumes that, despite the new legislation allowing two Accessory Dwelling Units (ADUs) per parcel under HB 1337, applications for ADUs will not increase, consistent with historic trends. Assumed densities to estimate housing units per acre of capacity are listed in Exhibit 4 – Assumed Densities: No Change Scenario. These assumptions reflect achieved, zoned, and market trends to better reflect likely build-out for the available land capacity.

**Exhibit 4 – Assumed Densities: No Change Scenario**

Zone	Assumed density (du/acre)
CB1 – Central Business 1	0.9
CB2 – Central Business 2	0.9
GO – General Office	0
GO-H – General Office Hospital	0
HCB – Highway and Community Business	0
NB – Neighborhood Business	0
PUD – Planned Unit Development	6.8
R-1 – Residential 1 (15,000 sq. ft.)	2.902
R-2 – Residential 2 (8,400 sq. ft.)	6.5
R-3 – Residential 3 (6,200 sq. ft.)	6.48
R-4 – Residential 4 (6,200 sq. ft.)	15.013
RMHP – Residential Mobile Home Park	7.023

With the high number of recent construction and permit applications in the pipeline, many of the deficits under the needs analysis have been addressed through recent construction. However, households making

0-30% AMI would likely face fewer housing choices in the next 20 years without any policy changes, as shown in Exhibit 5.

**Exhibit 5 – Housing Need Surplus/Deficit: No Change Scenario**

Income Level	Income Bracket	Zones Serving Income Levels	Projected Housing Need	Total Capacity + Pipeline Allocated	Surplus/ (Deficit)
0-30% AMI	\$0 - \$27,557	R-4, RMHP	247	209	(38)
30-50% AMI	\$27,557 - \$45,928	R-4, RMHP	39	209	170
50-80% AMI	\$45,928 - \$73,484	CB1, CB2, R-4	61	141	80
80-100% AMI	\$73,484 - \$91,855	CB1, CB2, R-3, R-4	93	152	59
100-120% AMI	\$91,855 - \$110,226	CB1, CB2, PUD, R-3	106	161	55
>120% AMI*	\$110,226+	PUD, R-1, R-2, R-3	511	1,144	633
<b>Total</b>			<b>1,057</b>	<b>2,016</b>	<b>959</b>

\*HB 1220 does not require jurisdictions to demonstrate policy changes to meet sufficient capacity for upper incomes.

## 5. Smaller Lots for Starter Homes Scenarios

Community engagement and public comments have identified a desire for smaller homes on smaller lots to create more “starter” homes for younger professionals—who may not be able to afford traditional single-family homes on larger lots—and “downsized” homes for seniors. The following options explore scenarios that adjust the density calculations to reflect a smaller lot size. The first scenario (5.1) explores lot size reductions to R-1 and R-2 zones, as referenced as an option in the Race and Disparate Impact Analysis.<sup>4</sup> The second scenario (5.2) explores size reductions for R-3 to determine how many more additional R-4 scale units would be needed to meet housing need for the bracket 0-30% AMI.

Note that the resulting surplus deficit estimates in these scenarios only consider vacant and redevelopable lands under existing conditions. Practically, the impact of such changes would likely extend beyond just vacant and buildable lands, as existing units on large lots become available for infill with such changes.

<sup>4</sup> This is separate study document with recommendations to meet the Racially Disparate Impacts requirements of HB 1220.

### 5.1 R-1 and R-2 lot size reductions

The following density calculations reduce the minimum lot size for R-2 to 6,200 sf and 10,000 sf for R-1. The assumed densities used for this analysis are shown below in Exhibit 6 – Assumed Densities: R-1 and R-2 Lot Size Reduction Scenario. The assumed income levels served by these zones are 80% AMI and above for the R-2 zone and 100% AMI and above for the R-1 zone. The table in Exhibit 7 shows these assumption changes in bold underlines.

**Exhibit 6 – Assumed Densities: R-1 and R-2 Lot Size Reduction Scenario**

List zones (jurisdiction)	Assumed density (du/acre)
R-1 – Residential 1 (15,000 sq. ft.)	2.902
R-2 – Residential 2 (8,400 sq. ft.)	6.5

The lot size reduction increases the total residential land capacity from 388 to 457 units. While this scenario did not reduce the deficit for the lowest income bracket (0-30% AMI), it does increase capacity among middle-income brackets, which could likely result in less competition for units affordable at lower income levels in the future. However, renter/buyer competition for housing stock is not included in the calculations of this model, as they cannot be accurately forecasted.

**Exhibit 7 – Housing Need Surplus/Deficit: Smaller Lots Scenario 5.1**

Income Level	Income Bracket	Zones Included	Projected Housing Need	Total Capacity + Pipeline Allocated	Surplus/ (Deficit)
0-30% AMI	\$0 - \$27,557	R-4, RMHP	247	209	<b>(38)</b>
30-50% AMI	\$27,557 - \$45,928	R-4, RMHP	39	209	170
50-80% AMI	\$45,928 - \$73,484	CB1, CB2, R-4	61	141	80
80-100% AMI	\$73,484 - \$91,855	CB1, CB2, R-3, R-4, <b><u>R-2</u></b>	93	430	337
100-120% AMI	\$91,855 - \$110,226	CB1, CB2, PUD, R-3, <b><u>R-2, R-1</u></b>	106	462	356
>120% AMI	\$110,226+	PUD, R-1, R-2, R-3	511	748	237
<b>Total</b>			<b>1,057</b>	<b>2,199</b>	<b>1,142</b>

### 5.2 R-3 Lot Size Reduction

This policy option seeks to answer the question, how much more moderate-density land would be needed to meet the lowest income bracket deficit? This scenario adjusts the assumed density for R-3 from 6.5

dwelling units/acre to 8 dwelling units/acre, assuming a minimum lot size of 5,000 sf. This also assumes that some of the R-3 zone will then serve 0-50% AMI (20% of the zone), with half of units in the zone serving 100-120% AMI. While adjusting the R-3 zone lot size does reduce the deficit, it does not erase it entirely, as seen in Exhibit 8.

**Exhibit 8 – Housing Need Surplus/Deficit: Smaller Lots Scenario 5.2**

Income Level	Income Bracket	Zones Included	Projected Housing Need	Total Capacity + Pipeline Allocated	Surplus/ (Deficit)
0-30% AMI	\$0 - \$27,557	R-4, RMHP, <u>R-3</u>	247	214	(33)
30-50% AMI	\$27,557 - \$45,928	R-4, RMHP, <u>R-3</u>	39	214	175
50-80% AMI	\$45,928 - \$73,484	CB1, CB2, R-4, <u>R-3</u>	61	149	88
80-100% AMI	\$73,484 - \$91,855	CB1, CB2, R-3, R-4	93	149	56
100-120% AMI	\$91,855 - \$110,226	CB1, CB2, PUD, R-3	106	174	68
>120% AMI	\$110,226+	PUD, R-1, R-2	511	1,122	611
<b>Total</b>			<b>1,057</b>	<b>2,021</b>	<b>964</b>

## 6. Increase Achieved Density in the R-4 Zone

Since R-4 accommodates the majority of the lowest income segments of Enumclaw, this scenario asks, what would be the likely impact of increasing the achieved density for R-4 from 15 dwelling units/acre to 18? This analysis applies the same assumptions regarding income levels served by different zones as those used in the 'no change' scenario.

**Exhibit 9 – Housing Need Surplus/Deficit: Increased Density in R-4**

Income Level	Income Bracket	Zones Included	Projected Housing Need	Total Capacity + Pipeline Allocated	Surplus/ (Deficit)
0-30% AMI	\$0 - \$27,557	R-4, RMHP	247	223	(24)
30-50% AMI	\$27,557 - \$45,928	R-4, RMHP	39	223	184
50-80% AMI	\$45,928 - \$73,484	CB1, CB2, R-4	61	155	94
80-100% AMI	\$73,484 - \$91,855	CB1, CB2, R-3, R-4	93	166	73
100-120% AMI	\$91,855 - \$110,226	CB1, CB2, PUD, R-3	106	161	55

Income Level	Income Bracket	Zones Included	Projected Housing Need	Total Capacity + Pipeline Allocated	Surplus/ (Deficit)
>120% AMI	\$110,226+	PUD, R-1, R-2, R-3	511	1,144	633
<b>Total</b>			<b>1,057</b>	<b>2,072</b>	<b>1,015</b>

## 7. Summary

Overall, Enumclaw has sufficient capacity to meet the projected housing units required for the next 20 years (see Exhibit 10 for a summary of all scenario results). However, this report suggests that additional policies and programs are necessary to adequately support the 0-30% AMI bracket. Considering the surplus capacity for the 30-50% AMI bracket, the City can support reallocating surplus units across different income brackets by implementing policies changes to incentivize more affordable housing. This can be achieved through measures such as offering density bonuses, adjusting lot sizes, or allowing cottage developments, if there are affordability agreements and conditions.

**Exhibit 10 – Scenario Summary Table**

Income Level	Income Bracket	Scenario Surplus/ (Deficit) Results			
		4: No change	5.1: R-1 and R-2 Lot Size Reductions	5.2: R-3 Lot Size Reduction	6: Increased Density in R-4
0-30% AMI	\$0 - \$27,557	(38)	(38)	(33)	(24)
30-50% AMI	\$27,557 - \$45,928	170	170	175	184
50-80% AMI	\$45,928 - \$73,484	80	80	88	94
80-100% AMI	\$73,484 - \$91,855	59	337	56	73
100-120% AMI	\$91,855 - \$110,226	55	356	68	55
>120% AMI	\$110,226+	633	237	611	633
<b>Total</b>		<b>959</b>	<b>1,142</b>	<b>964</b>	<b>1,015</b>



## Appendix A

The following table shows the allocation ratios used to allocate zoned capacity to income bracket. This method recognizes that zones can accommodate more than a single income level or bracket. Ratios add up to 100% by row.

**Assumed Allocation Ratios Table – No change**

Residential Zones	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	100-120% AMI	>120% AMI
CB1 – Central Business 1			0.25	0.25	0.50	
CB2 – Central Business 2			0.25	0.25	0.50	
GO – General Office						
GO-H – General Office Hospital						
HCB – Highway and Community Business						
NB – Neighborhood Business						
PUD – Planned Unit Development					0.50	0.50
R-1 – Residential 1 (15,000 sq. ft.)						1.00
R-2 – Residential 2 (8,400 sq. ft.)						1.00
R-3 – Residential 3 (6,200 sq. ft.)				0.25	0.25	0.50
R-4 – Residential 4 (6,200 sq. ft.)	0.25	0.25	0.25	0.25		
RMHP – Residential Mobile Home Park	0.50	0.50				



Appendix B

Buildable Acre Capacities and Deductions

Zone	Gross Developable Land (acres)			Infrastructure/ Market Factor Deductions			Net Developable Land (acres)			
	Vacant	Partially-utilized	Under-utilized	Vacant	Partially-utilized	Under-utilized	Vacant	Partially-utilized	Under-utilized	Total
CB1 – Central Business 1	1.36	4.67	0.00	15%	25%	25%	1.2	3.5	0.0	4.7
CB2 – Central Business 2	1.07	1.45	0.00	15%	25%	25%	0.9	1.1	0.0	2.0
GO – General Office	12.07	13.35	0.00	15%	25%	25%	10.3	10.0	0.0	20.3
GO-H – General Office Hospital	0.00	0.00	0.00	15%	25%	25%	0.0	0.0	0.0	0.0
HCB – Highway and Community Business	15.77	34.76	0.00	15%	25%	25%	13.4	26.1	0.0	39.5
NB – Neighborhood Business	0.10	3.43	0.00	15%	25%	25%	0.1	2.6	0.0	2.7
PUD – Planned Unit Development	0.11	6.07	0.00	15%	25%	25%	0.1	4.6	0.0	4.6
R-1 – Residential 1 (15,000 sq. ft.)	2.49	18.71	0.00	15%	25%	25%	2.1	14.0	0.0	16.2
R-2 – Residential 2 (8,400 sq. ft.)	19.65	113.18	0.00	15%	25%	25%	16.7	84.9	0.0	101.6
R-3 – Residential 3 (6,200 sq. ft.)	0.13	3.68	0.00	15%	25%	25%	0.1	2.8	0.0	2.9
R-4 – Residential 4 (6,200 sq. ft.)	15.83	6.65	0.00	15%	25%	25%	13.5	5.0	0.0	18.4
RMHP – Residential Mobile Home Park	0.85	0.00	0.00	15%	25%	25%	0.7	0.0	0.0	0.7
	69.44	205.93	0.00				59.0	154.5	0.0	213.5