

August 27, 2024

City of Enumclaw
Community Development Department
1309 Myrtle Ave.
Enumclaw, WA 98022

RE: March 2024 Draft Comprehensive Plan Periodic Update
Public Comments

Dear City Council and Staff:

Thank you for the opportunity to comment on the draft Comprehensive Plan Update. We have reviewed the plan and, as landowners of property in the Enumclaw UGA, have the following comments.

First, Enumclaw Land L.L.C. owns three parcels within Enumclaw’s Potential Annexation Area (3020079028, -9067 and -9035). Parcel -9028’s pre-annexation zoning is R-1 and the other parcels are R-2. The properties comprise a total of 16.63 acres and are currently developed with one single family residence each. Sewer and water are available at the west boundary of the properties as they were extended by the adjacent development. We submitted a Notice of Intention to Commence Annexation Proceedings in February 2023, which Council voted down. We remain interested in annexation of the properties for future multifamily or middle housing and believe the property could benefit the City in meeting its goals and policies as provided below.

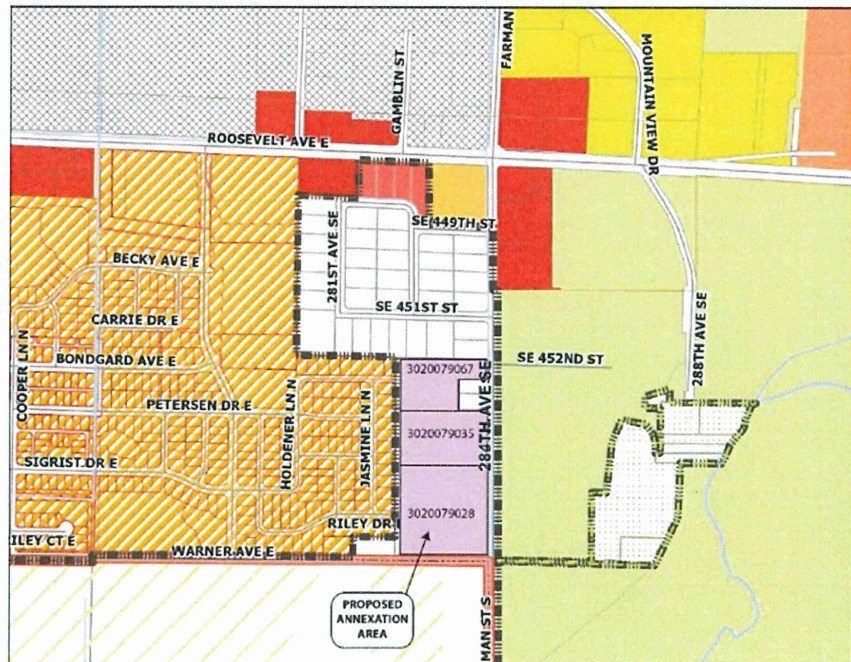


Figure 1 - Subject properties

Community Profile Chapter 2 Comments

- We understand that the Comprehensive Plan addresses and meets the need for the growth targets. However, the city needs to provide diverse housing types, including multifamily and more affordable housing that are dispersed evenly throughout the city. **Annexation of the subject properties could help Enumclaw in achieving a diversity of housing types. The owner is interested in developing middle housing or multifamily.**

Land Use Chapter 3 Comments

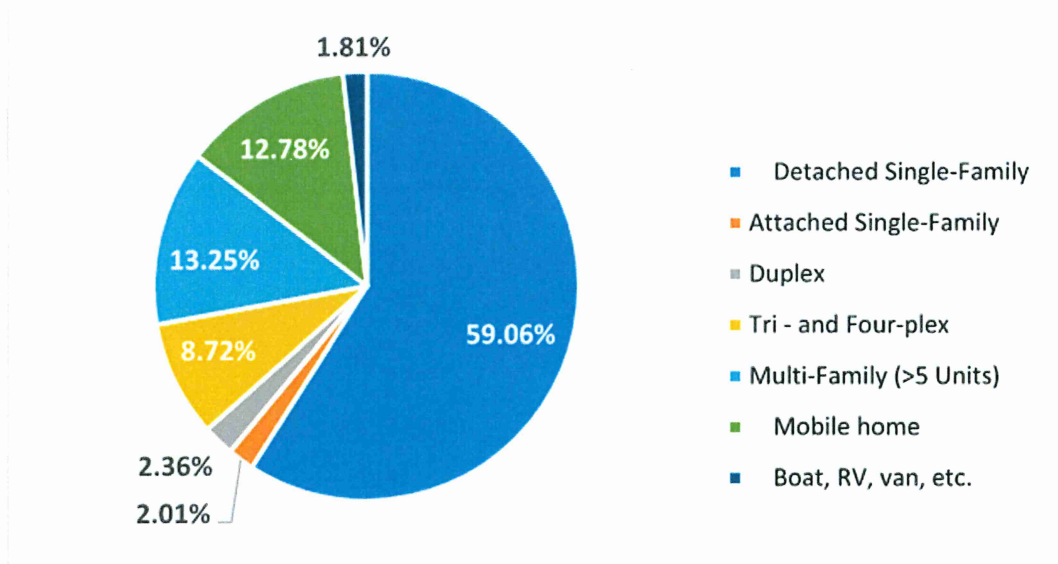
- Goal LU-1 and Policy LU-1.8 Encourages high quality building design in all new construction, renovations, and rehabilitation. **The annexation of this property and the potential housing that would achieve the City's comprehensive plan goals would be some of the highest quality housing within the region. In recent years, we have had two communities receive awards such as The Main apartments located in Sumner, WA and Glacier Run Apartments, located in Puyallup, WA, both were finalists for NAIOPWA's Residential Suburban Development of the year in 2020 & 2021.**
- Goal LU-2 strives to expand into areas that will not result in development beyond the City's financial and physical service capabilities and that will create manageable services areas. **The annexation of the subject properties would be helpful in meeting the financial and physical service capabilities because water and sewer are already stubbed to the property and, upon development, the property would be paying the city's connection charges and monthly utility fees thereby helping the city's financial and physical service capabilities.**
- New/Revised Policy LU2.2 seeks to expand the area of annexation proposals only when it would service to make city boundaries more regular or where urban services have been made available to the proposed annexation area. **The annexation of the subject properties could be completed without expansion and provide regular city boundaries. The urban services are available to the area.**
- Goal LU-5 and Policy LU-5.1 seek sufficient residential land to encourage a variety of housing choices and densities for all stages of life, income levels, and household compositions. Goal LU-6 seeks to distribute more affordable housing opportunities, such as middle housing, in all residential areas. **The annexation of the subject properties and designation for high density housing or middle housing would help the city in meeting these goals by providing a housing choice and density for people needing a more affordable alternative than single family detached housing.**
- Policy LU-8.2 seeks to locate higher density housing within walking distance (1/4 mile) of existing and planned shopping areas, jobs, and multi-modal forms of transportation. **The annexation of subject properties would be about 0.3 miles to the commercial/industrial property to the north and about 1.1 miles to the main retail and shopping center located off of Roosevelt Ave & Griffin Ave.**

Capital Facilities – Chapter 4 Comments

- Goal CF-1 Ensure that necessary public facilities and services can adequately serve development envisioned in the land use element when it is occupied and used without negatively impacting existing service levels. Exhibit CF-10 “City of Enumclaw Potable Water Utility 20-year Needs Analysis” shows a subtotal of \$18,540,000 for projects that need to be completed within the next 6 years and an additional \$19,500,000 subtotal for all other projects analyzed for the remaining 20-year span. Exhibit CF-1213 “City of Enumclaw Wastewater Utility 20-year Needs Analysis” shows a subtotal of \$44,370,000 for projects that need to be completed within the next 20-year horizon. Annexation of subject property and the additional housing developed would connect to the already existing sewer and water infrastructure that is stubbed to the property’s current boundary. The utility connection fees (\$8,661/unit for Sewer and \$4,777/unit for water), in addition to the permitting and impact fees for residential development (\$2,123/unit for transportation, \$801/unit for parks, \$2,383/unit for fire, and \$1,805/unit for schools), would equate to over \$20,000 per unit of development. In addition, each unit would then begin to pay monthly utility billing fees that over the course of a 20-year span could provide an excess of \$1-2 million to the city’s capital facilities fund.

Housing – Chapter 5 Comments

- Policy H-2.2 Blend housing types that are affordable to households in all economic segments as needed throughout the community to avoid over-concentration of one housing type. Per exhibit H-6 “City of Enumclaw Housing Types, 2020”, Detached single-family housing makes up almost 60% of the housing type within the City of Enumclaw. The annexation of subject property could help increase the stock of middle housing that is shown at less than 10% (Tri and Four-plex housing – 8.7% and Attached single-family housing at 2%).



Source: 2020: ACS 5-year estimate Table S2504

- Policy H-2.7 and H-2.12 through 2.14 encourage more senior and multifamily housing to meet the needs of people who work and desire to live in the City. **The annexation of the subject properties and designation for higher density housing or middle housing would help the city in meeting these goals by providing a housing choice and density for people needing a more affordable alternative than single family detached housing.**
- Goals H-3 and its policies allow various densities and diverse housing types for households in all economic segments and for its senior, disables, and younger residents. Policies H.3.3 through H-3.5 encourage duplexes, triplexes, and fourplexes, smaller lot sizes and multifamily housing to increase densities, provide affordable housing and promote opportunities for affordable homeownership. **The annexation of the subject properties and designation for high density housing or middle housing would help the city in meeting these goals by providing a housing choice and density for people needing a more affordable alternative than single family detached housing.**

GMA Racially Disparate Impact Report Comments

- The Racially Disparate Impact Report identifies a need for affordable senior housing and rental housing and housing choices in general.
- The Racially Disparate Impact Report recommends designating additional areas for medium density residential and R3 zoning and the effectiveness of this is considered “high”.
- Vacancy rates in the City are very low at 3.5 percent.

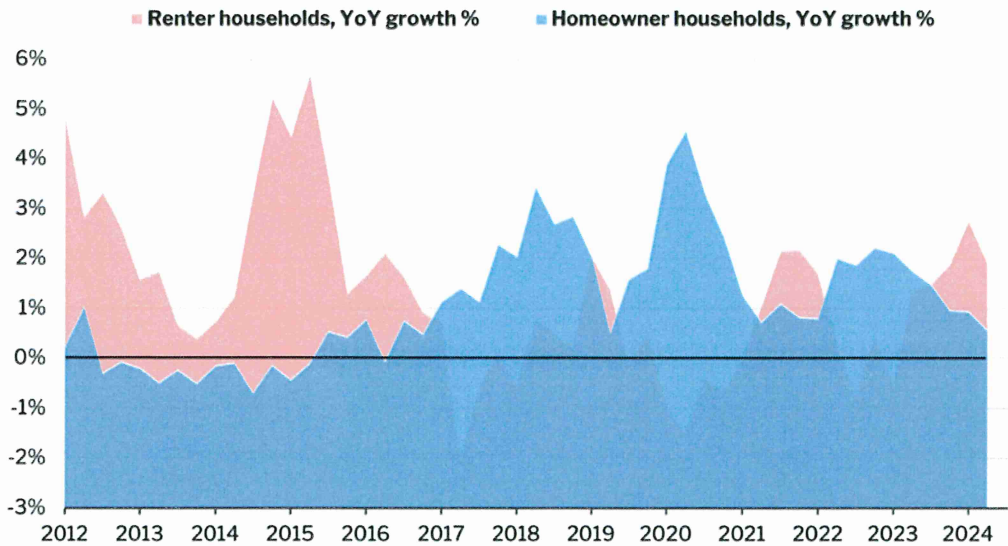
The city needs to provide an increased diversity of housing types, including multifamily and more affordable housing types that are dispersed evenly throughout the City. The annexation of the subject properties and designation for high density housing or middle housing would help the city in addressing racially disparate impacts by providing a housing choice for people needing a more affordable alternative than single family detached housing.

The annexation of subject properties is an attempt to allow the City to keep up with the current housing trends that are impacting the community and our surrounding region. Per a report published by Redfin in August of 2024, “The number of renter households grew *three times* faster than the number of homeowner households”.

- *The number of renter households grew 1.9% in the second quarter—one of the biggest gains in recent years. The number of homeowner households rose 0.6%—the smallest uptick since 2022.*
- *America’s renter population is growing as the cost of homeownership climbs; mortgage payments are up 90% from before the pandemic, while asking rents are up 23%.*
- *The affordability crunch isn’t as severe in the rental market because the U.S. has been building a lot of apartments; still, many renters struggle to cover housing costs.*

U.S. Is Adding Renter Households Faster Than Homeowner Households

Year-over-year change in renter and homeowner households (%); quarterly



Source: Redfin analysis of U.S. Census Bureau data
Note: Most recent data point is Q2 2024

REDFIN

Ultimately, the city of Enumclaw's vision statement declares, "*Enumclaw brings people together with a sense of community that values all ages and incomes. Our vision is to grow with the intention to provide services and institutions for the well-being of our residents and businesses. We plan diverse housing choices that allow new families to flourish, and longtime residents to remain*". If given the chance, we would like to help the City of Enumclaw achieve not only the Comprehensive Plan's goals, but to also give Enumclaw an opportunity to stay true to this vision statement.

Thank you for your consideration. We look forward to the opportunity to work with you on this matter.

Sincerely,

Dennis L. Rattie
President, Tarragon L.L.C.
Authorized Representative of Enumclaw Land L.L.C.