



GMA Racially Disparate Impact Report

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City of Enumclaw

Enumclaw Middle Housing Project
April 2023

DRAFT



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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.¹ 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

¹ 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

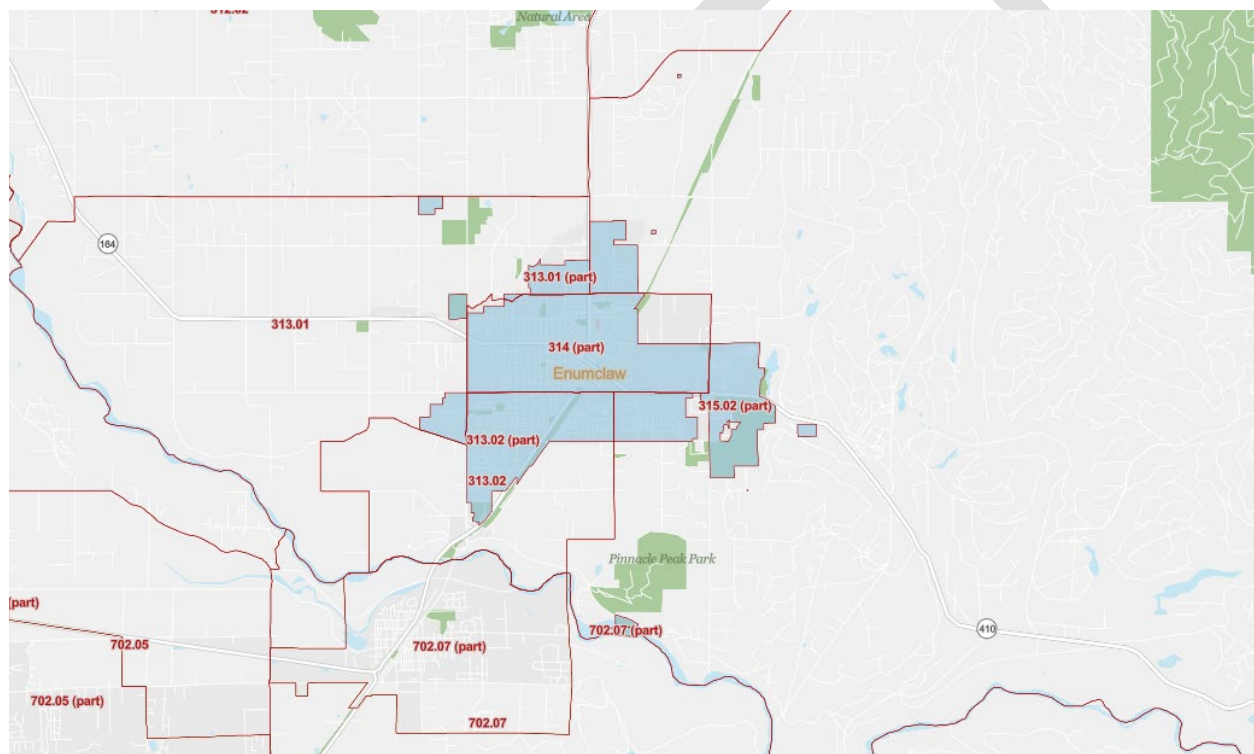
Understanding the City's community profile provides regional location context, information about the City's population, demographics, and housing characteristics. Lack of affordable housing impacts primarily those with incomes less than 80 percent of the HUD area median family income (HAMFI), which includes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

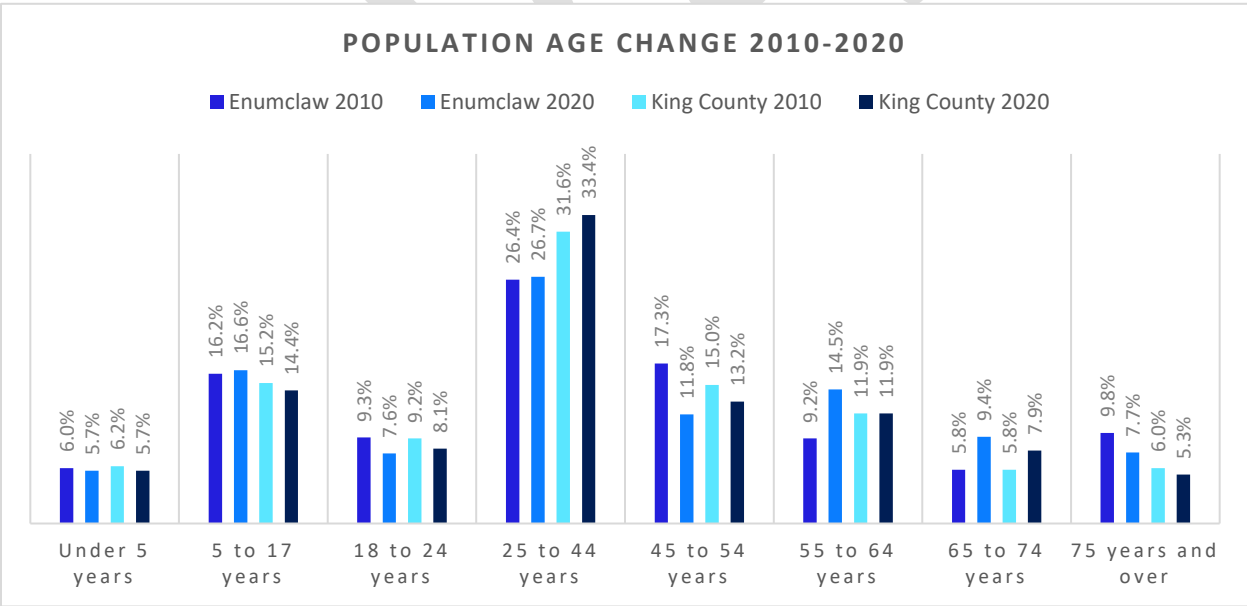
The distribution of age is an indicator of the type of housing that may be necessary to meet the needs of the community. Older households generally need smaller homes than families with children. Older households also typically have lower incomes and are thus more vulnerable to economic displacement.

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:

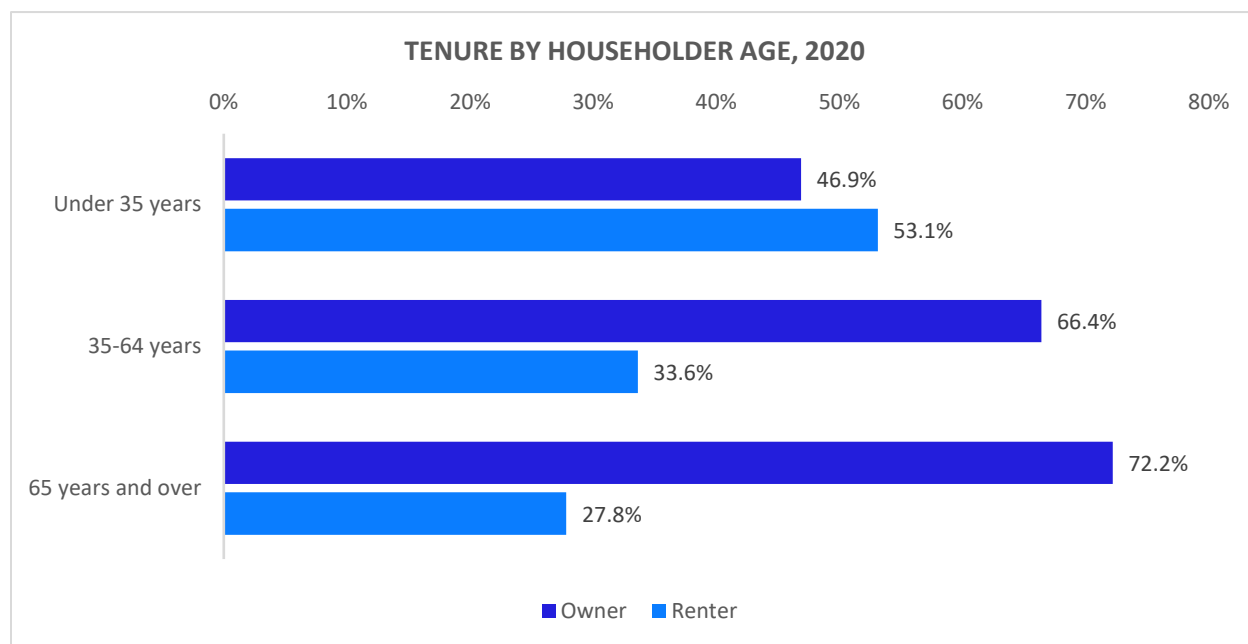
- The City will continue to have a significant need for housing types suitable for elderly residents as residents in the 55- to 64-year and 65- to 74-year cohort age.
- Rental housing is important for those under the age of 35 (Figure 2-3).

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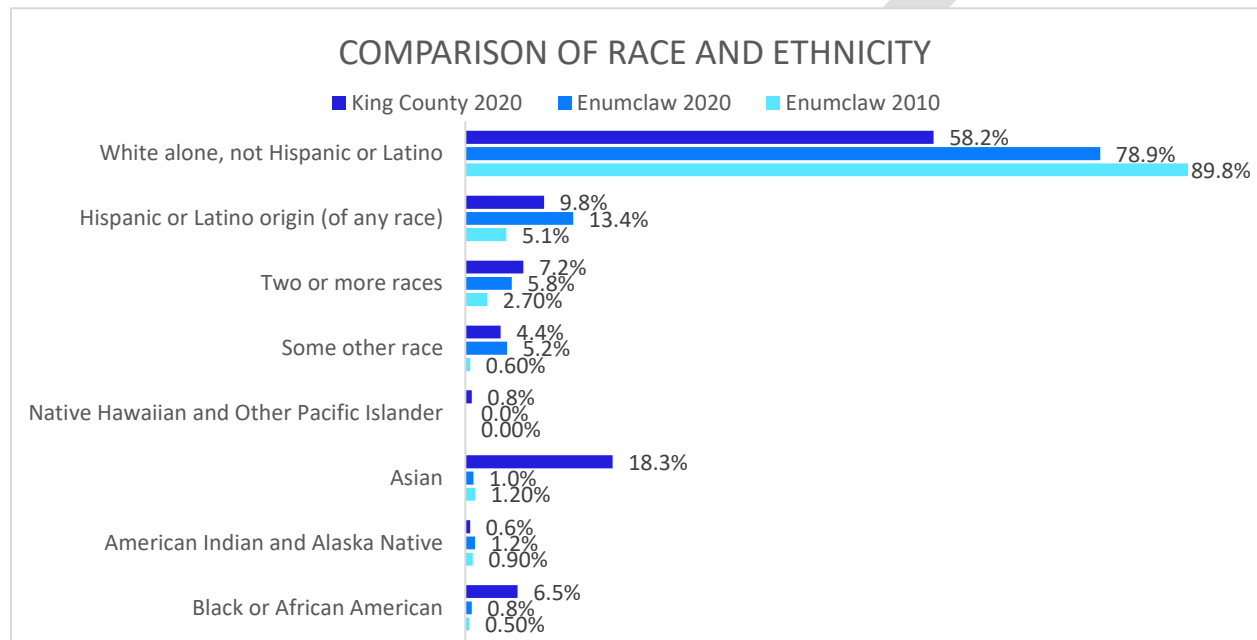
The City attracted additional households between 2010 and 2020 in the following racial/ethnic groups:

- 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:

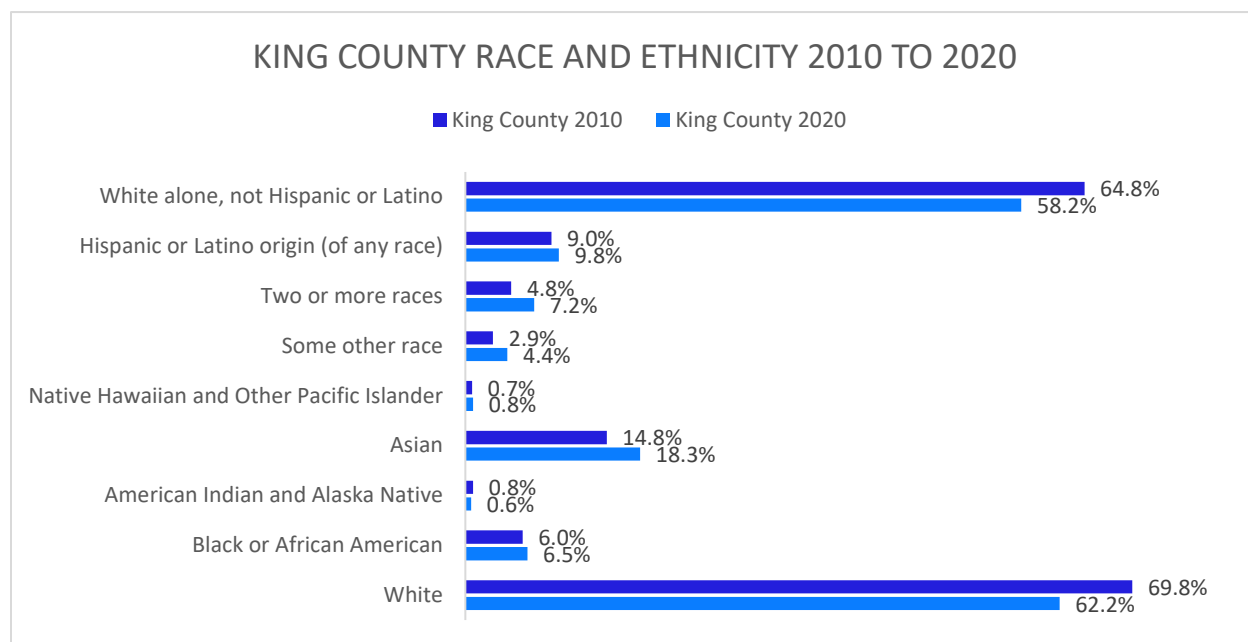
- The City is significantly less diverse than King County as whole.
- Race or ethnic groups identifying as non-white have increased over the last decade.
- The City has a higher proportion of Hispanic and Latino population than King County.

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.

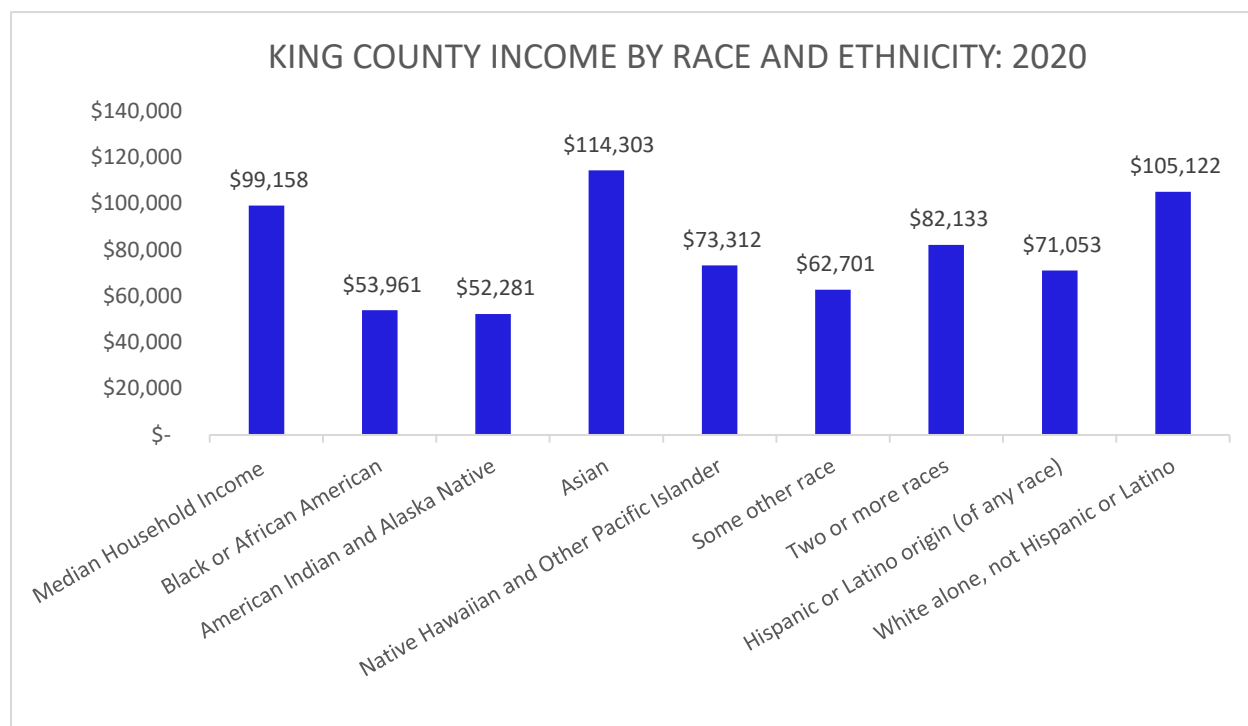
MHI in the City is slightly lower than King County as a whole. The 2021 median income in the City was \$91,855 as compared with \$99,855 for King County (Table 2-1 and Figure 2-6; USCB n.d.).

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 2021 (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.

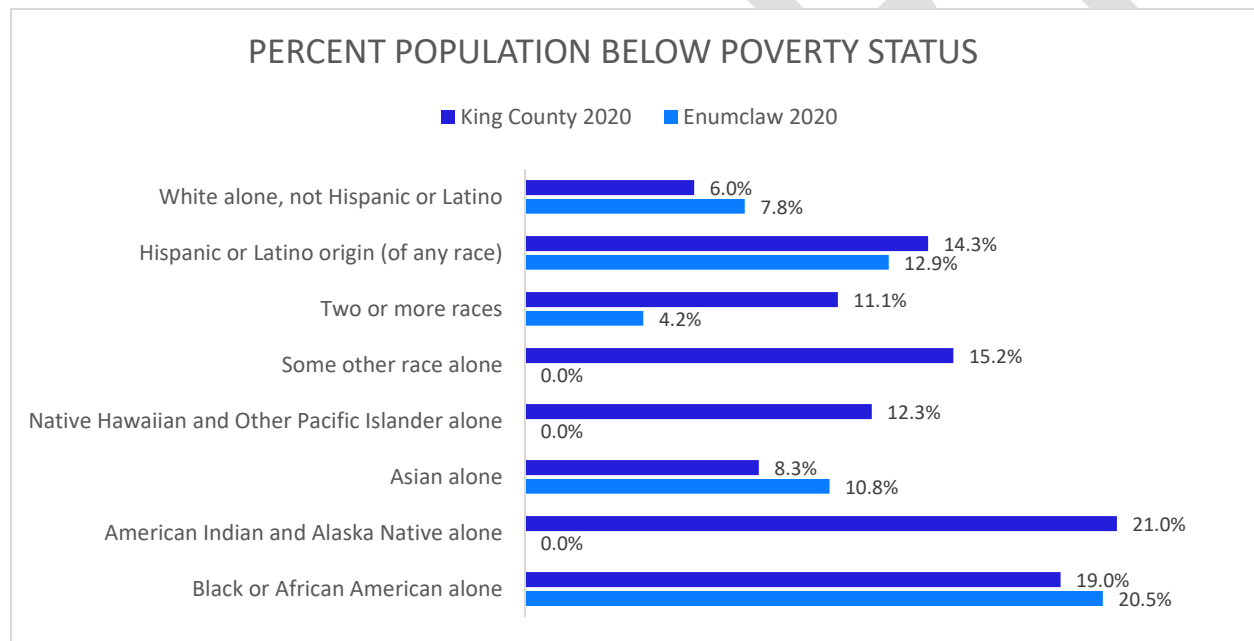
Residents over the age of 65 have lower incomes and higher poverty rates in the City than in King County (Figure 2-9). The MHI for City households over the age of 65 is \$42,500, whereas in King County it is \$60,276 (Table S1903; USCB n.d.). GMA defines households with this income as low-income households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

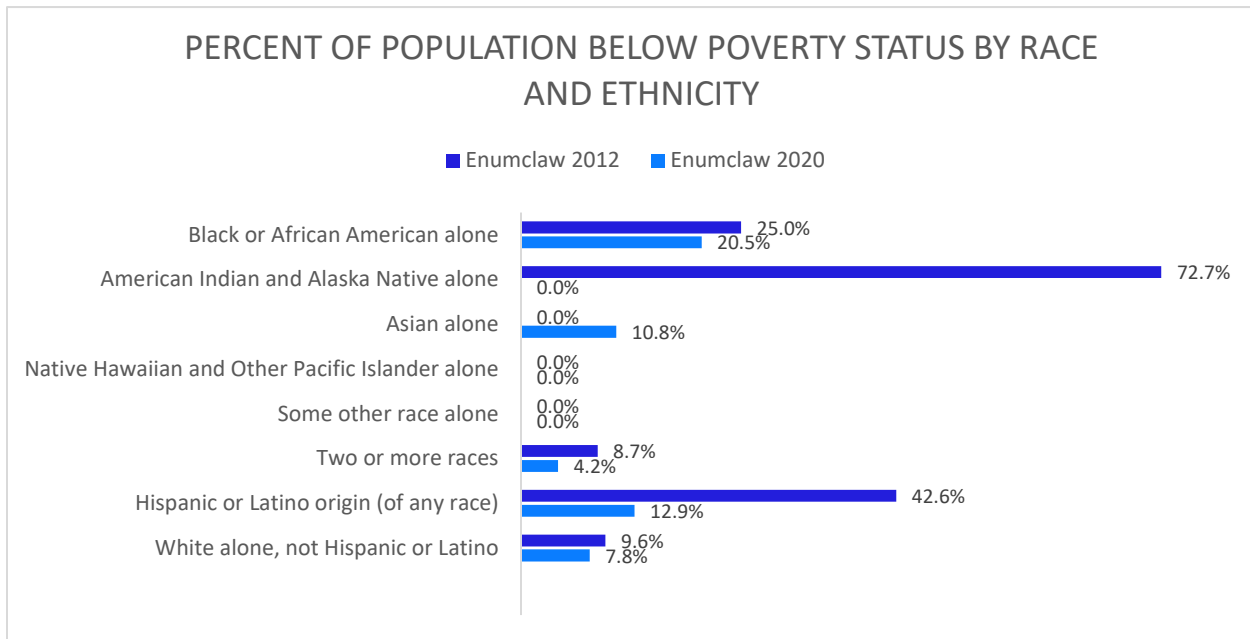
- Incomes increased in the City from 2010 to 2021, but the City’s MHIs are lower than the MHIs in King County.
- Renters have significantly lower incomes than homeowners.
- Households of color in the City likely receive lower incomes than white households.
- Based on MHI, most households of color are 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



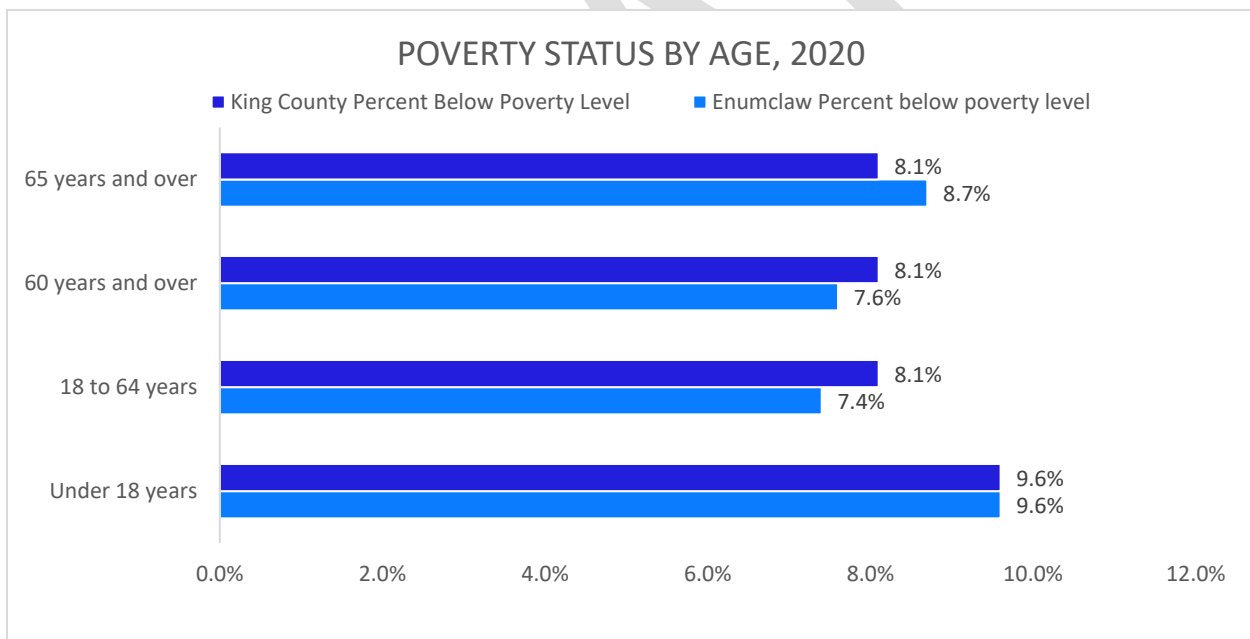
Source: ACSTable S1701 for Enumclaw City and King County in 2020 (USCB n.d.).

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.)

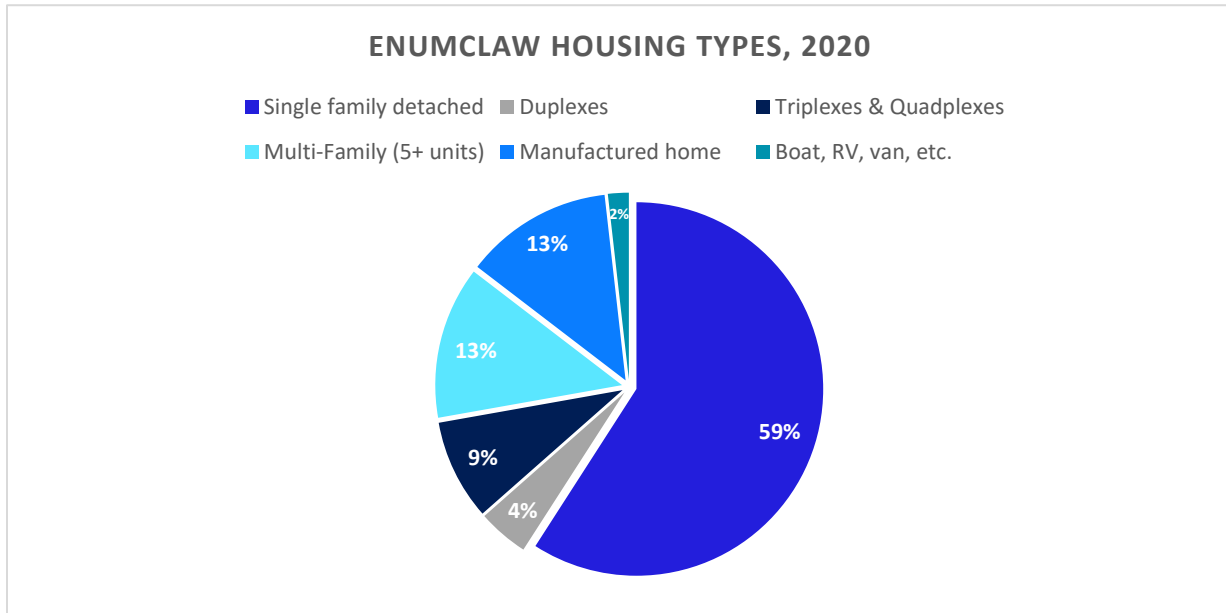
2.3 Housing Characteristics

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

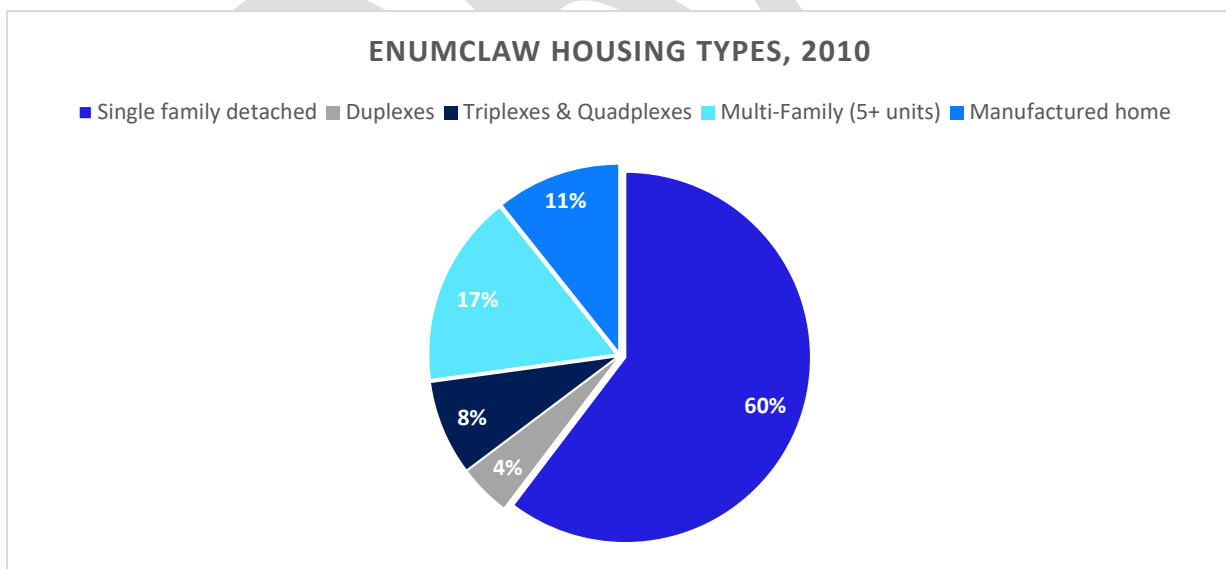
As of 2020, there were approximately 5,125 housing units in the City. The housing stock is predominately single-family detached units (59 percent) (Figure 2-10). The other 41 percent of housing is evenly distributed between multi-family, manufactured homes, and triplexes and quadplexes (Figure 2-10). 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



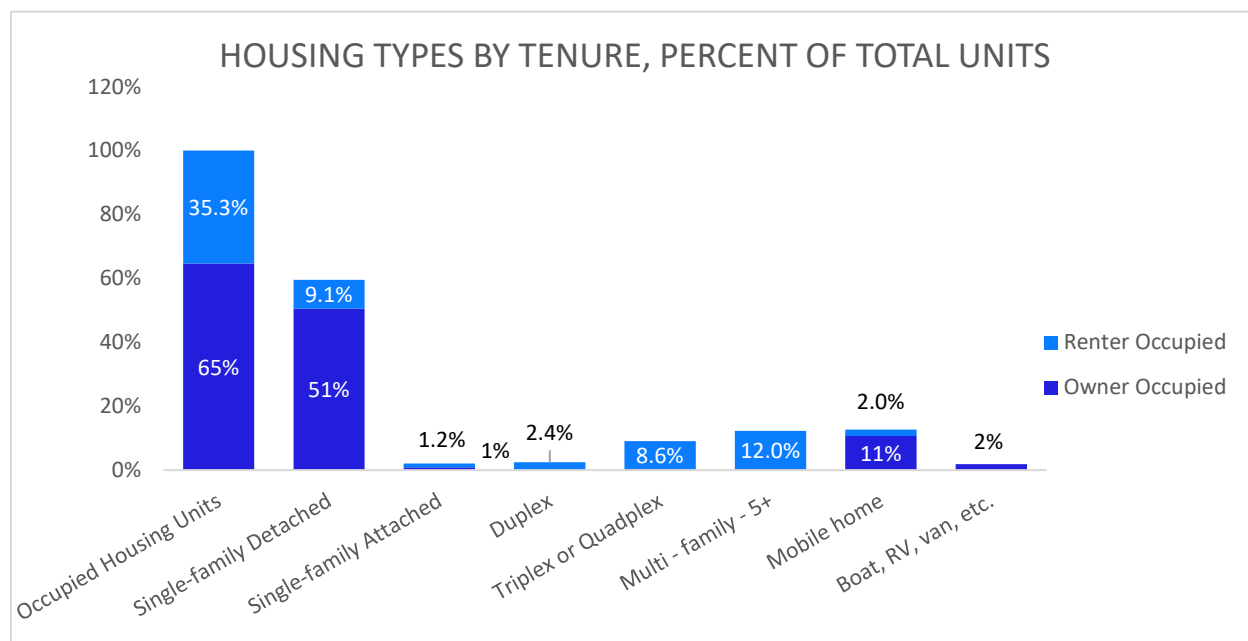
Source: ACSTable S2504 for Enumclaw City in 2010 (USCB n.d.).

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.

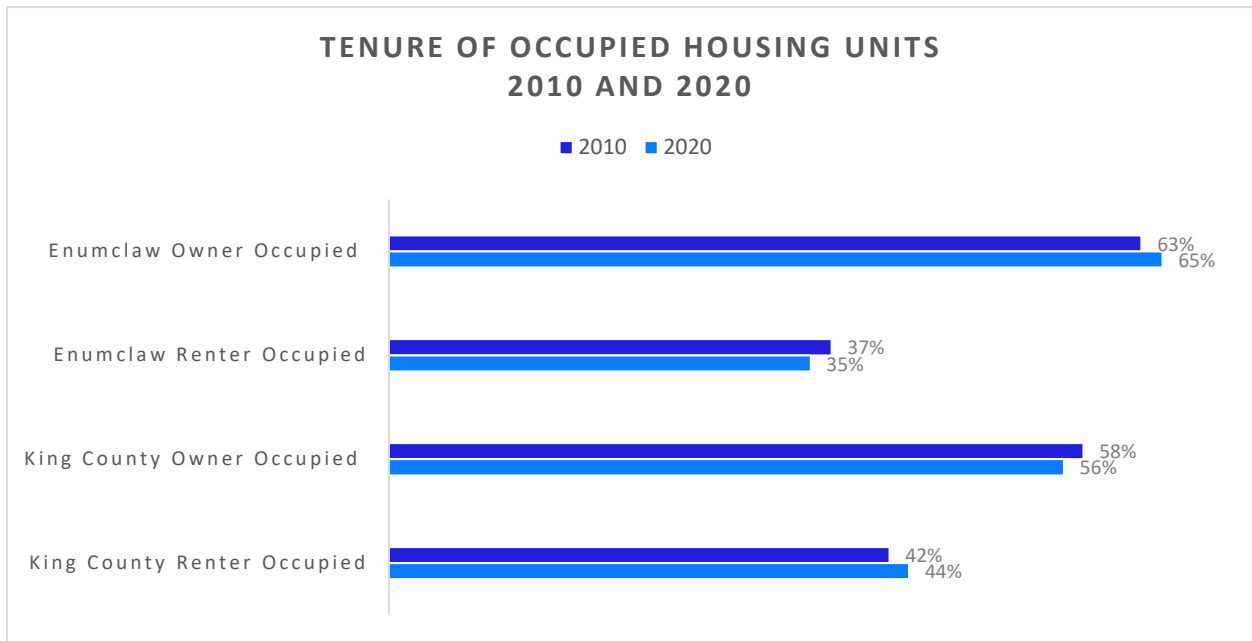
Rental units as a percentage of total housing units decreased by 2 percent between 2010 and 2020. This could be due to construction of more ownership-occupied units relative to rental units or a decrease in the number of units available for rental.

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:

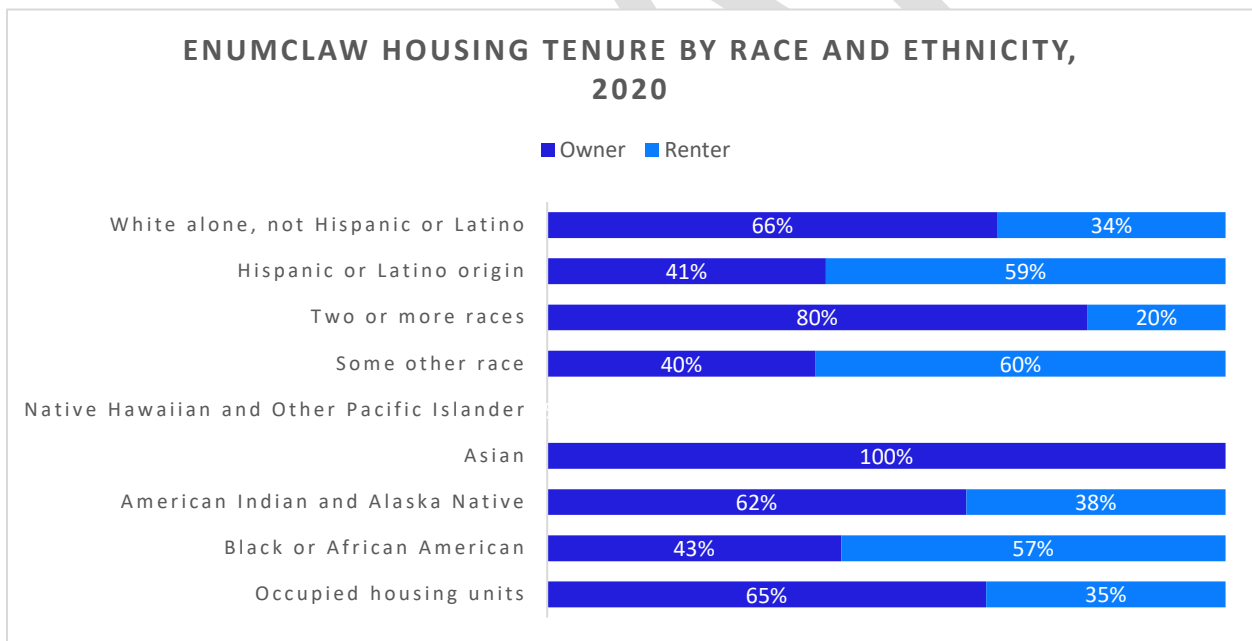
- Homeownership rates for most households in the City are higher than in King County.
- Nearly 7 out of 10 white households in the City own homes.
- Approximately 4 out of 10 Black or African American or Hispanic or Latino households in the City own homes.

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



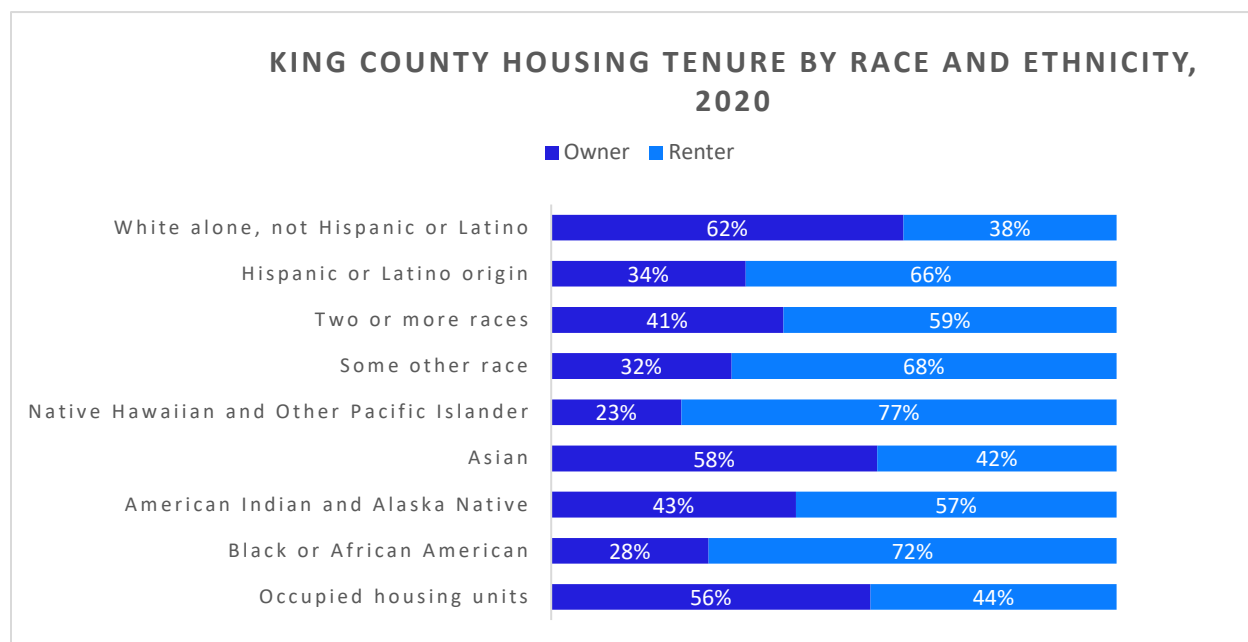
Source: ACSTable 2502 for Enumclaw City and King County in 2010 and 2020 (USCB n.d.).

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.

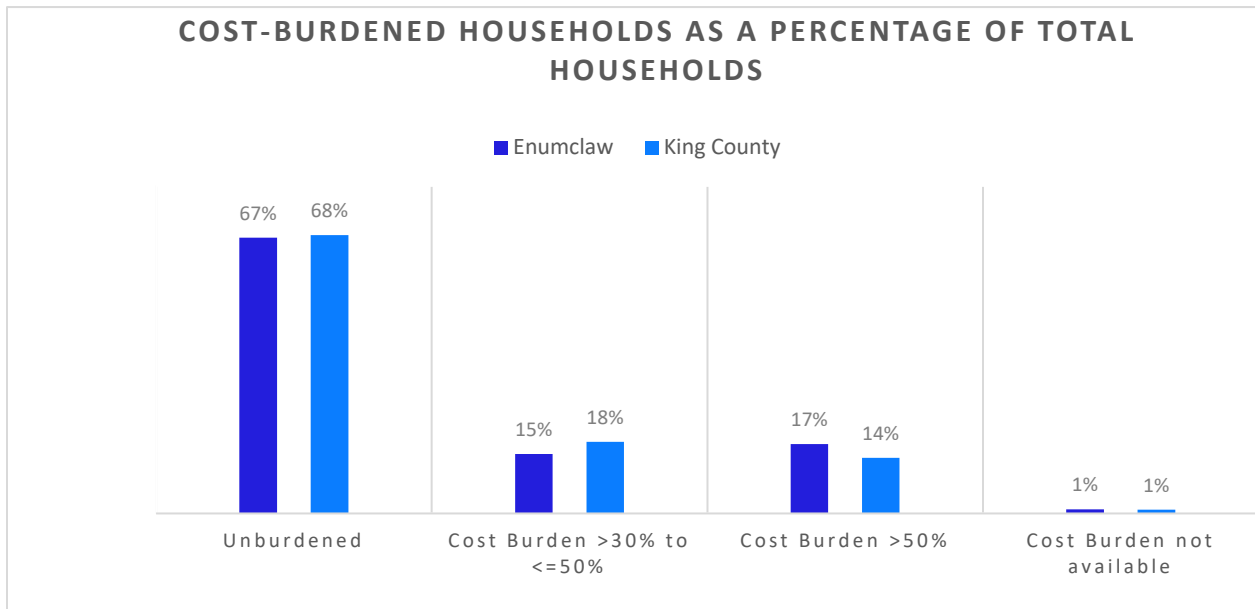
Housing affordability most acutely impacts renters (Figure 2-17) and low-income households (Figure 18 and Figure 2-19) in the City. Nearly all of the cost-burdened households in the City are low-income households (low-income households are defined as those making 80 percent or less of the HAMFI). More 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:

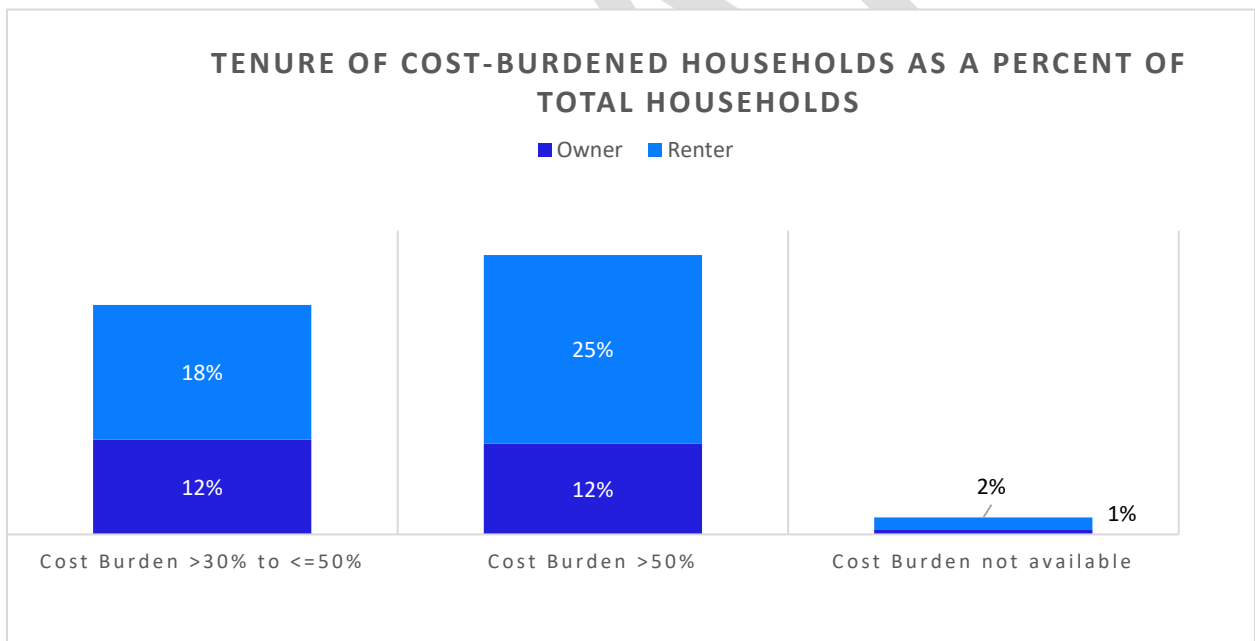
- Housing affordability is a challenge for 32 percent of the City's households, which is approximately 1,550 households:
 - Three in 10 City households are cost burdened.
 - Four in 10 renters are cost burdened.
- Housing affordability most acutely impacts the City's low-income households, including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



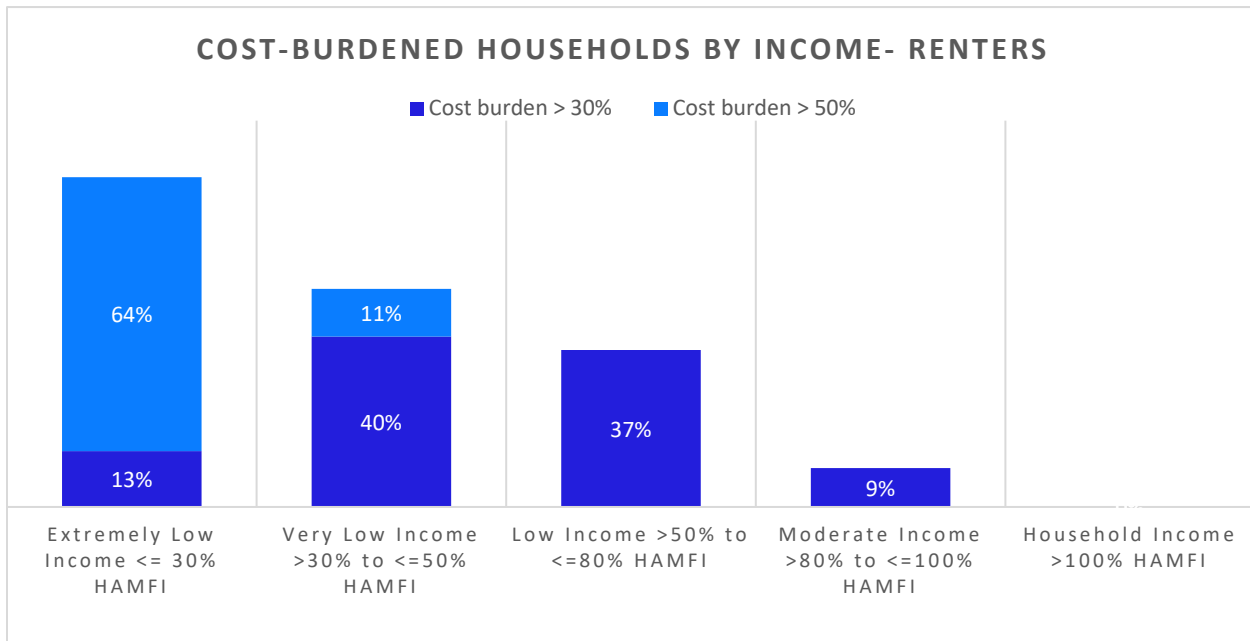
Source: HUD User 2022.

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



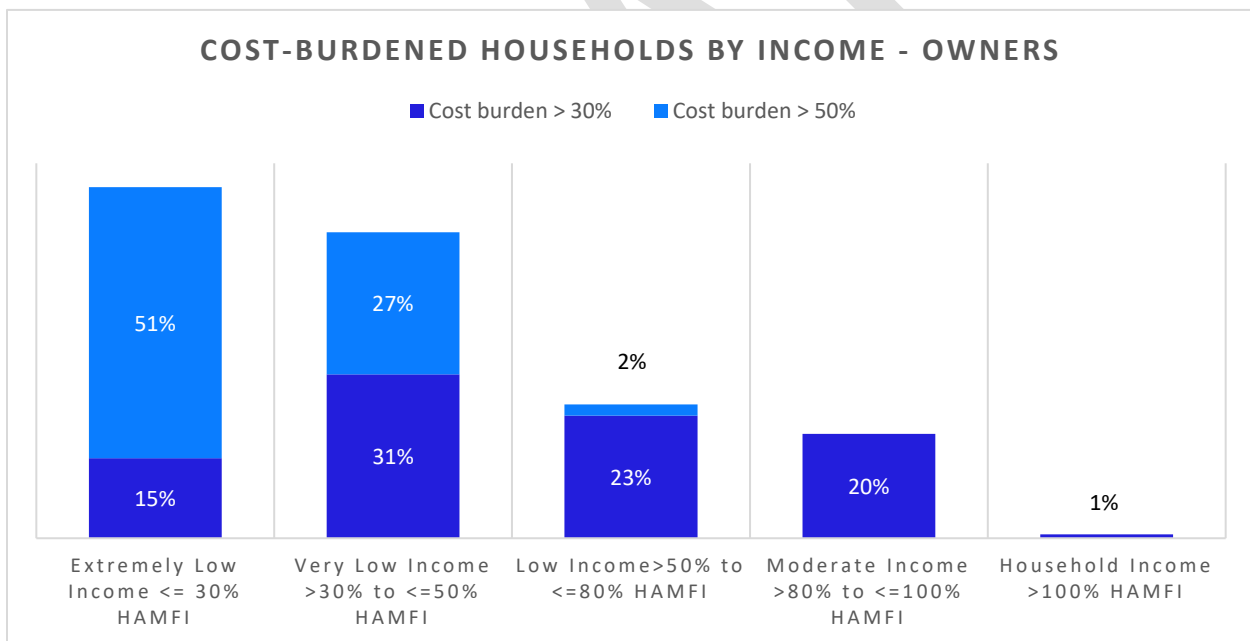
Source: HUD User 2022.

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



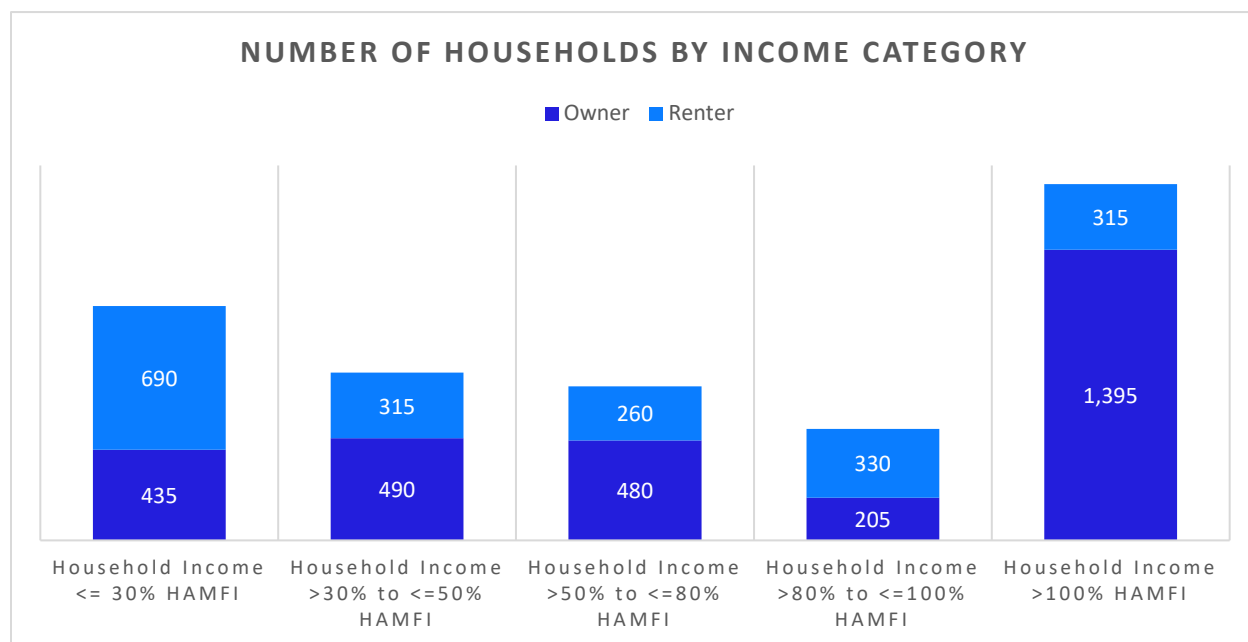
Source: HUD User 2022.

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 month². 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 \$73,160³. 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

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

³ 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 ^a	\$ 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.).

^a 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

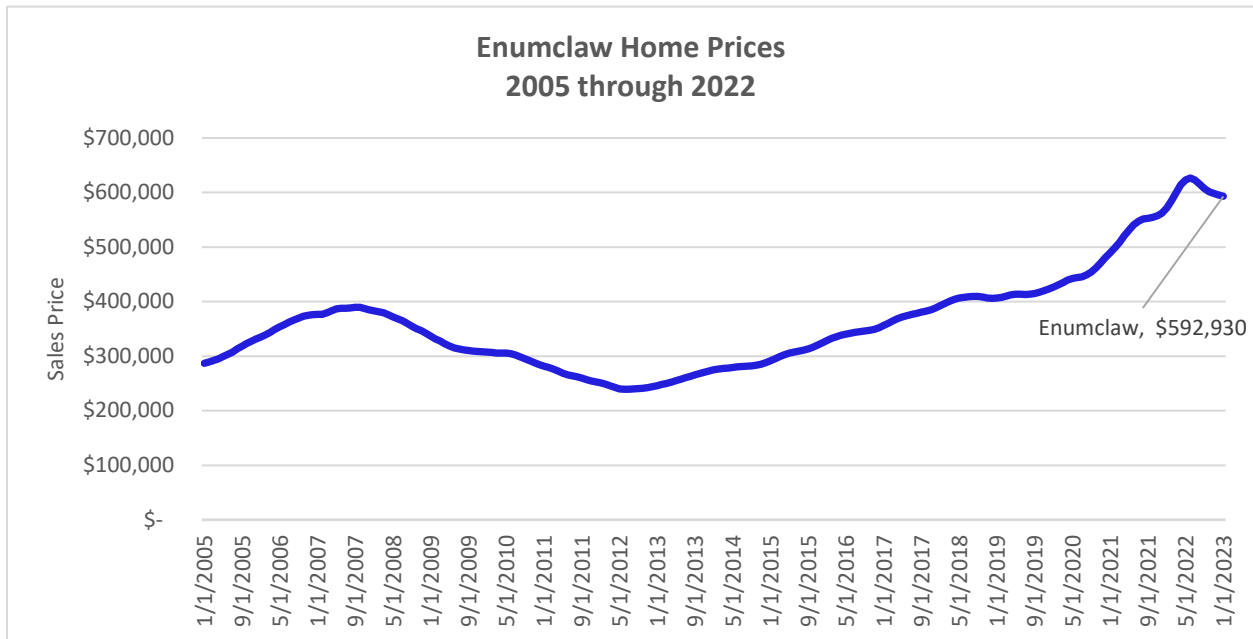
Housing affordability for the City is summarized as follows:

- 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

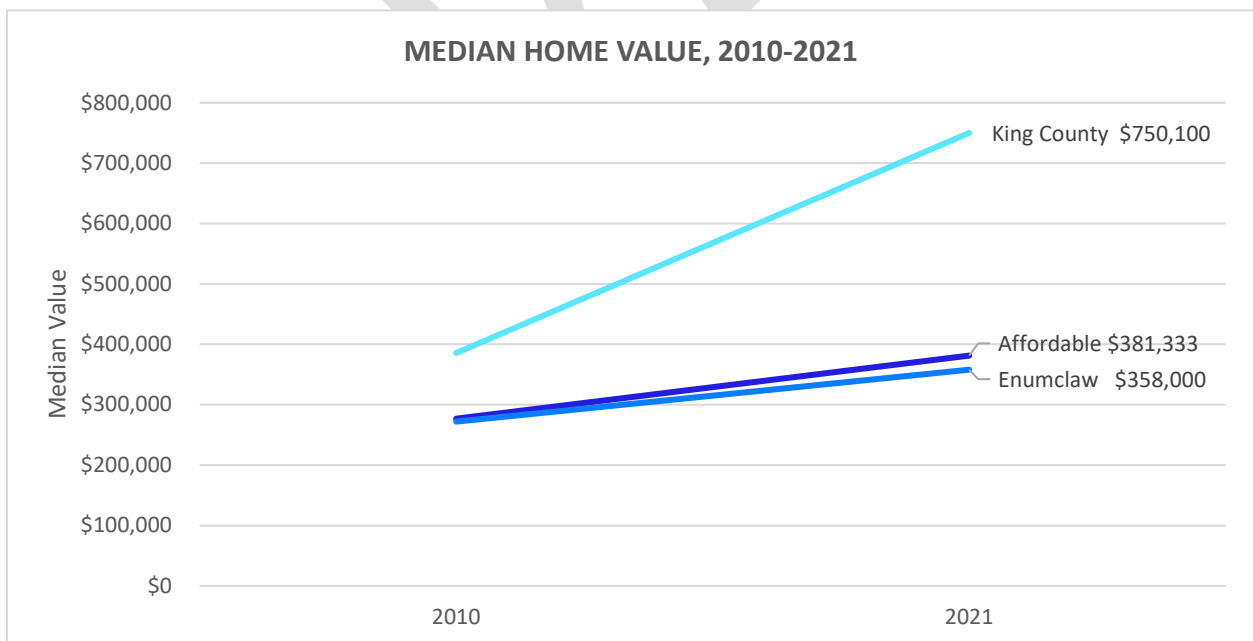
- Fifty percent of City households make less than \$91,955 and cannot afford to purchase a median valued home in the City.
- There are few homes available at prices affordable toMHIs.

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.

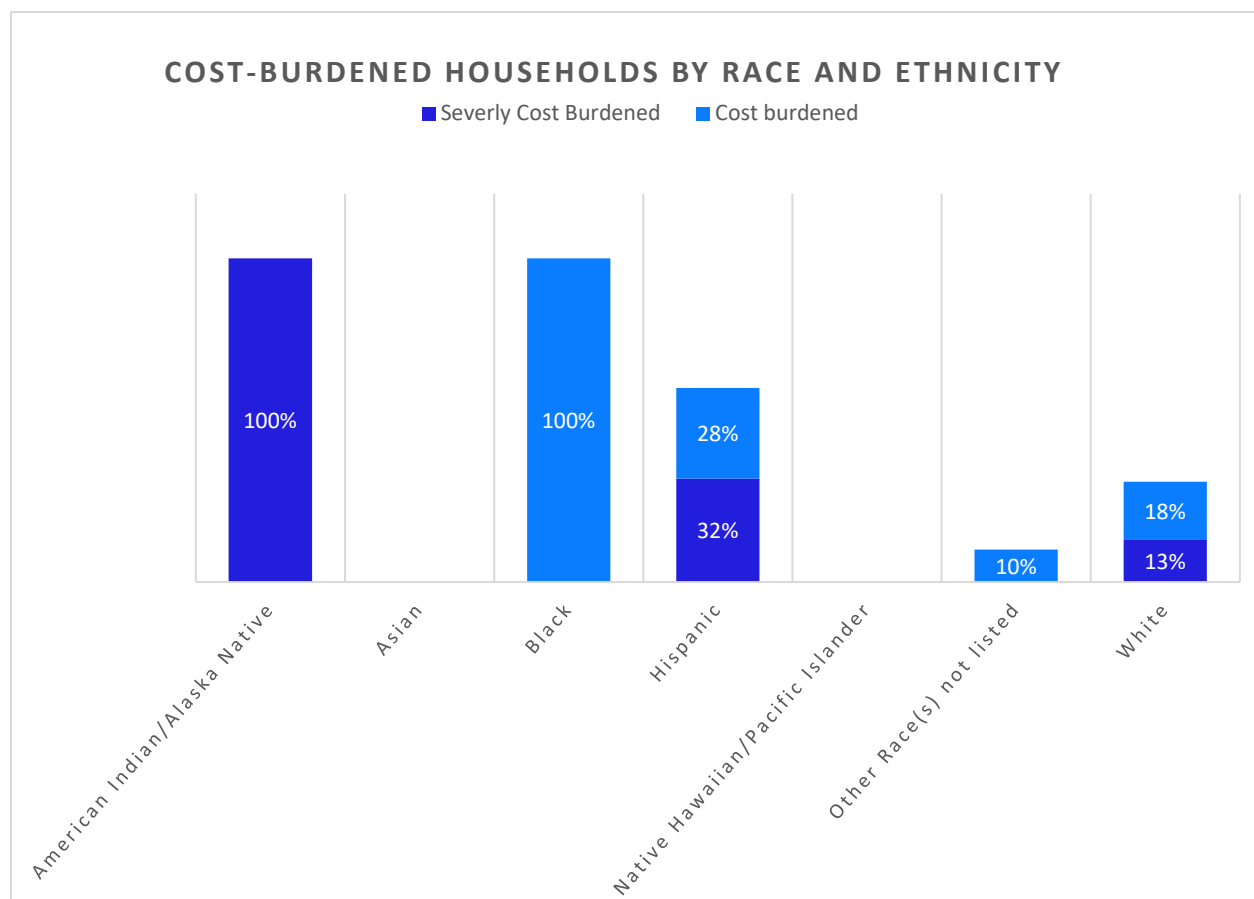
3.1.1.2.1 Possible causes of disparate impacts related to cost burden

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

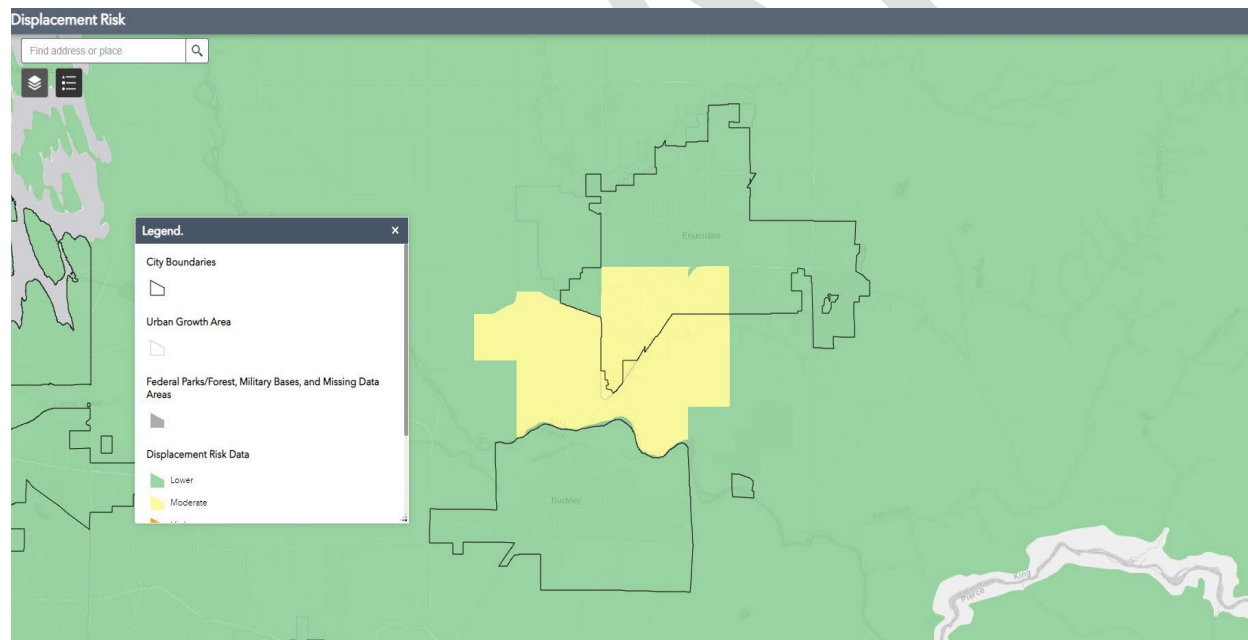
There is no available information about fair housing violations in the City. This is a data gap that will be included as part of the public and stakeholder surveys.

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

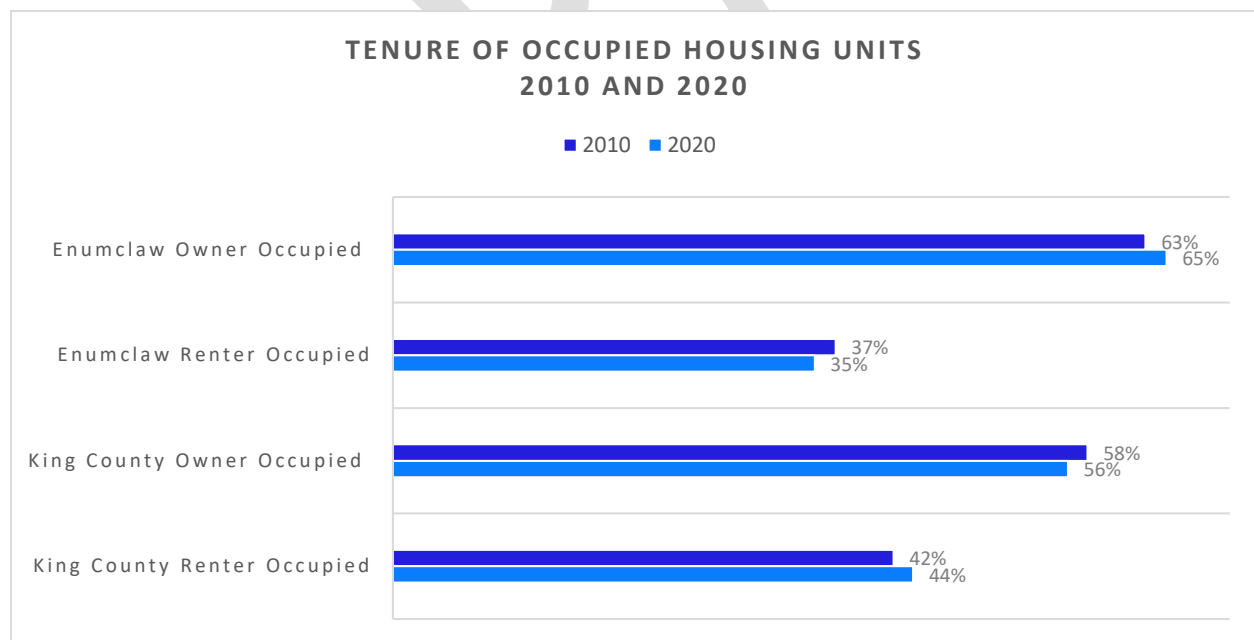
Changes in tenure, such as a reduction in the percent of renter households, may indicate that renters are being displaced as rental housing is converted to ownership housing (Washington State Department of Commerce 2022).

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 lower 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 R-1 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 to 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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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.).

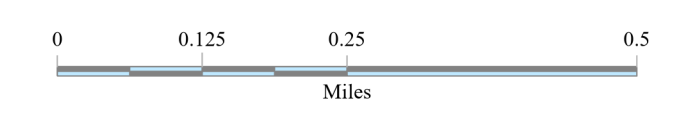
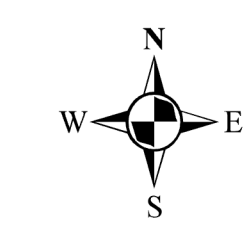
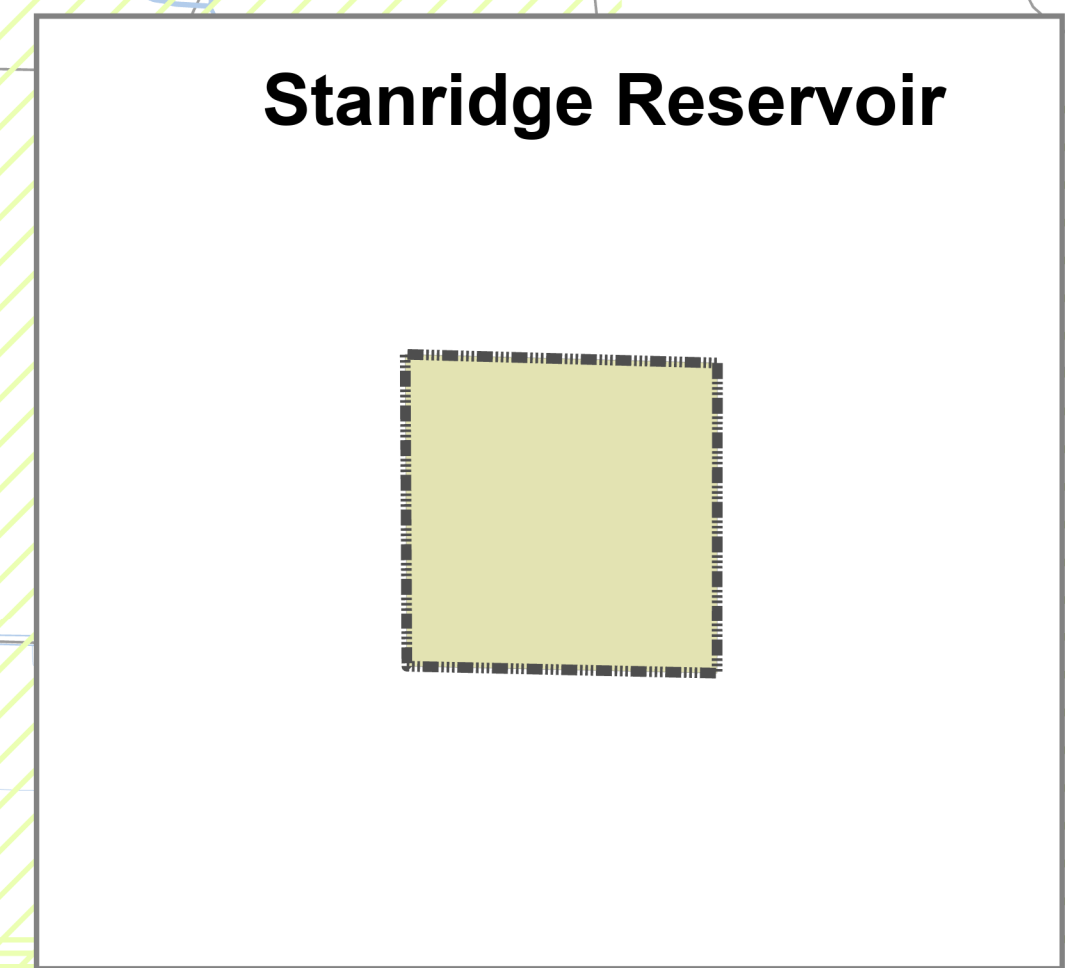
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Appendix B
City of Enumclaw Future Land Use Map

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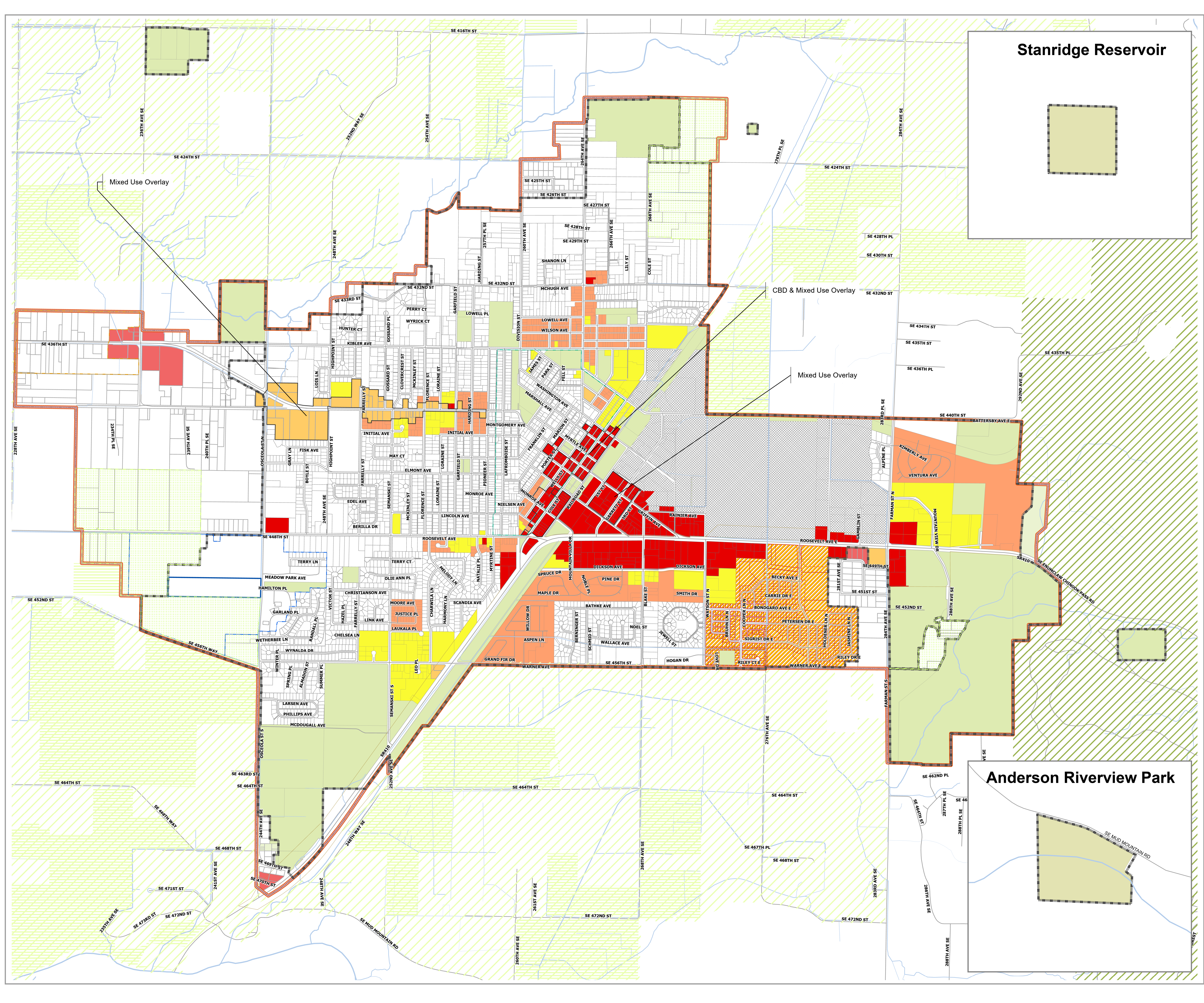
ENUMCLAW OFFICIAL LAND USE MAP

-  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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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 19.32.040				P			P		P	C	C			
Cottage housing, subject to Chapter 19.40 EMC	P ¹	P ¹	P ¹	P ¹	P ¹									
<i>Dwelling unit, accessory</i> subject to Chapter 19.34 EMC	P	P	P	P								P ²		
<i>Dwelling unit, duplex</i> (two units per structure), subject to Chapter 19.40 EMC		C	P ³ /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 ⁴				P ⁵ /C	P ⁶ /C	P ⁶ /C	P ⁶ /C			
<i>Multifamily development</i> (3+ units per structure), subject to Chapter 19.40 EMC				P		P ²			P ⁵ /C	P ^{5,6} /C	P ^{5,6} /C			
Group quarters, dormitories, fraternal houses, <i>boardinghouse</i> , not including <i>secure</i>				C			P		P ⁵ /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										
GENERAL CROSS REFERENCES:					Land use table instructions, see EMC 18.05.010 ; Development standards, see EMC Titles 18 and 19 ; Application and review procedures, see Chapters 15.16 through 15.36 EMC; General provisions, see Chapter 15.06 EMC; Italicized uses are defined in Chapter 15.04 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 ¹	6,200 sf	6,200 sf ²	5 acres	Requirements found in Chapter 18.34 EMC, Planned Unit Development (PUD) Requirements found in Chapter 18.16 EMC, Residential Manufactured Home Park District (RHMP)
Maximum Density	N/A	N/A	1 DU per 6,200 sf ³	1 DU per 2,900 sf ⁴	1 DU per 6,200 sf	
Maximum Lot Area	N/A	18,000 sf ⁵	12,500 sf ⁵	N/A	N/A	
Minimum Street Frontage	50 ft	50 ft	50 ft	50 ft ²		
Minimum Front Yard Setback	20 ft	20 ft	20 ft	20 ft		
Minimum Side Yard Setback ^{6,7}	9 ft	9 ft	9 ft	9 ft ^{2,8,9}		
Rear Yard	25 ft	25 ft	25 ft	25 ft		
Maximum Building Coverage ¹⁰	30%	40%	40%	40% ^{11,12}		
Maximum Building Height	30 ft	30 ft	30 ft	30 ft ¹³		
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 ¹⁴	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

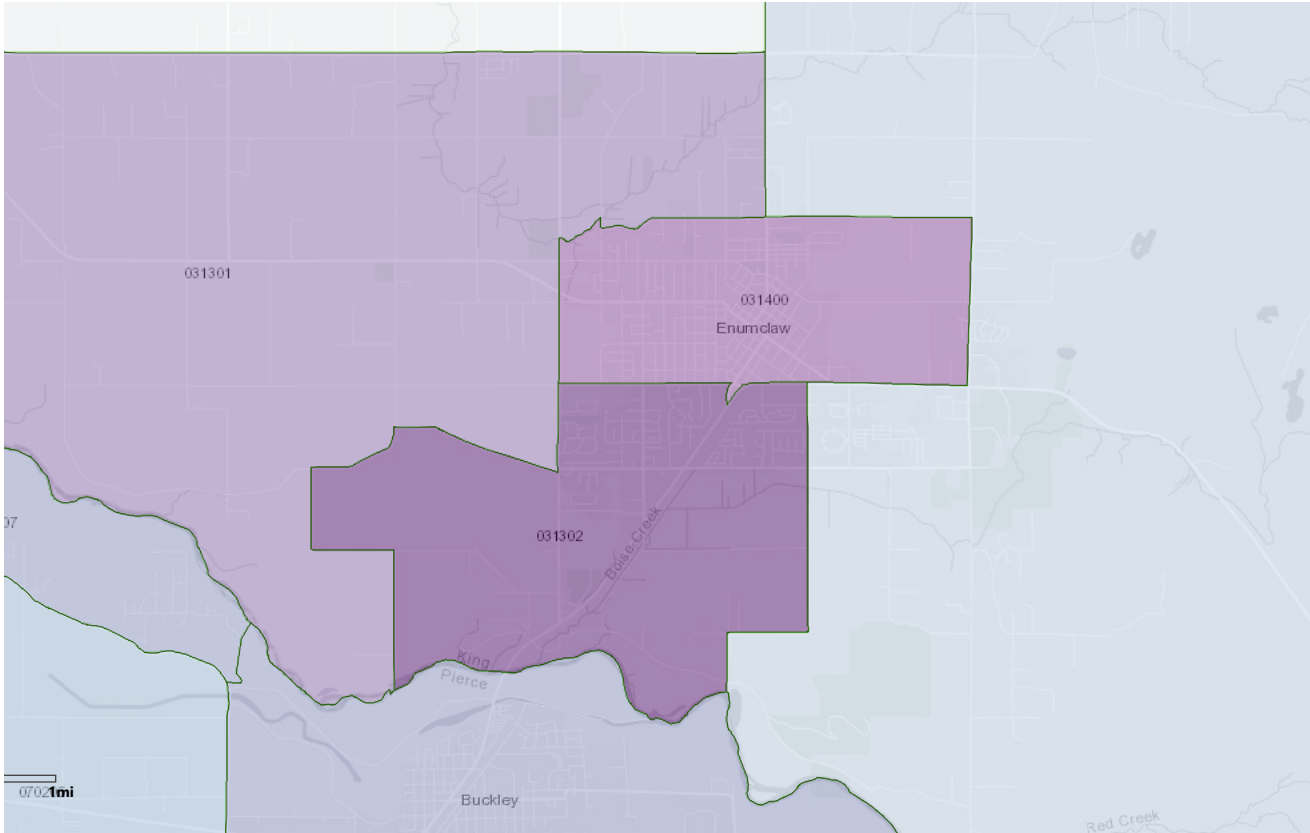
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Selection:

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

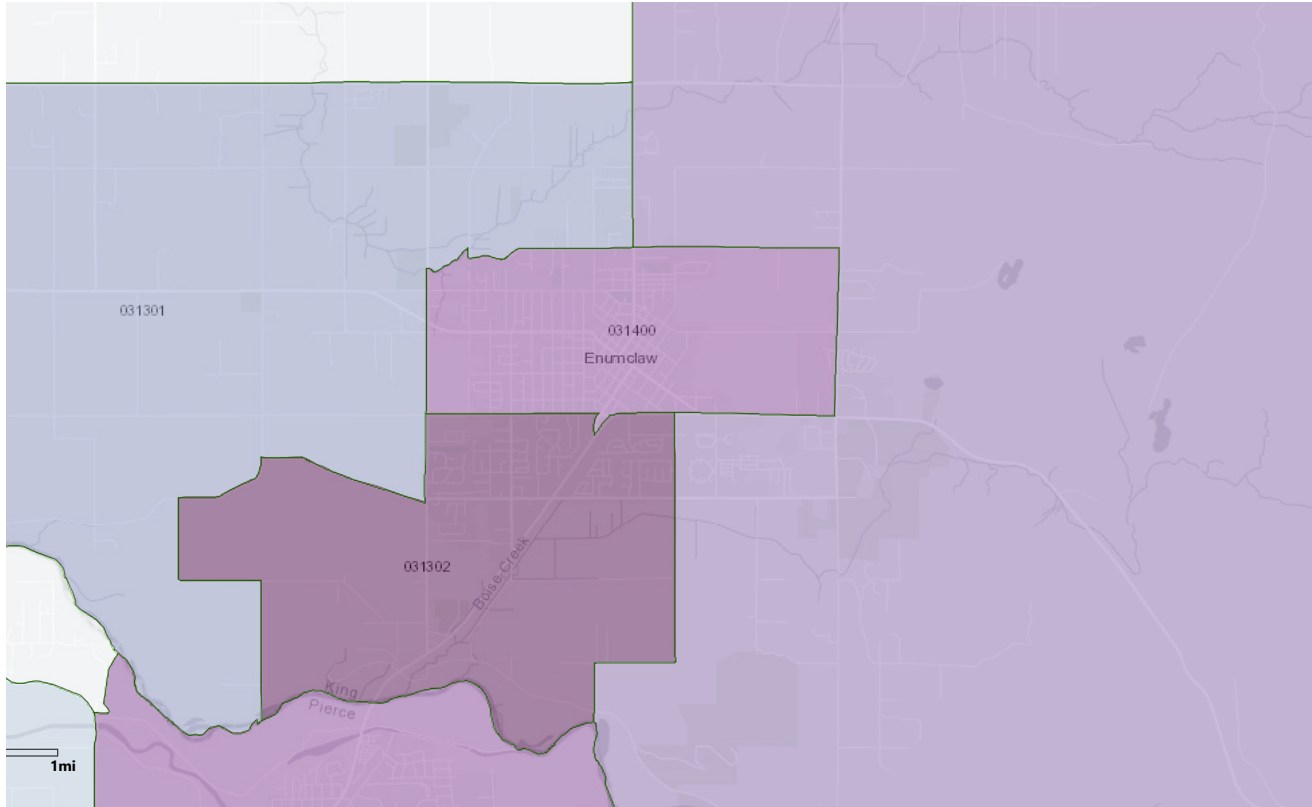
Legend: (High) 10 9 8 7 6 5 4 3 2 1 **(Low)**



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
- 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

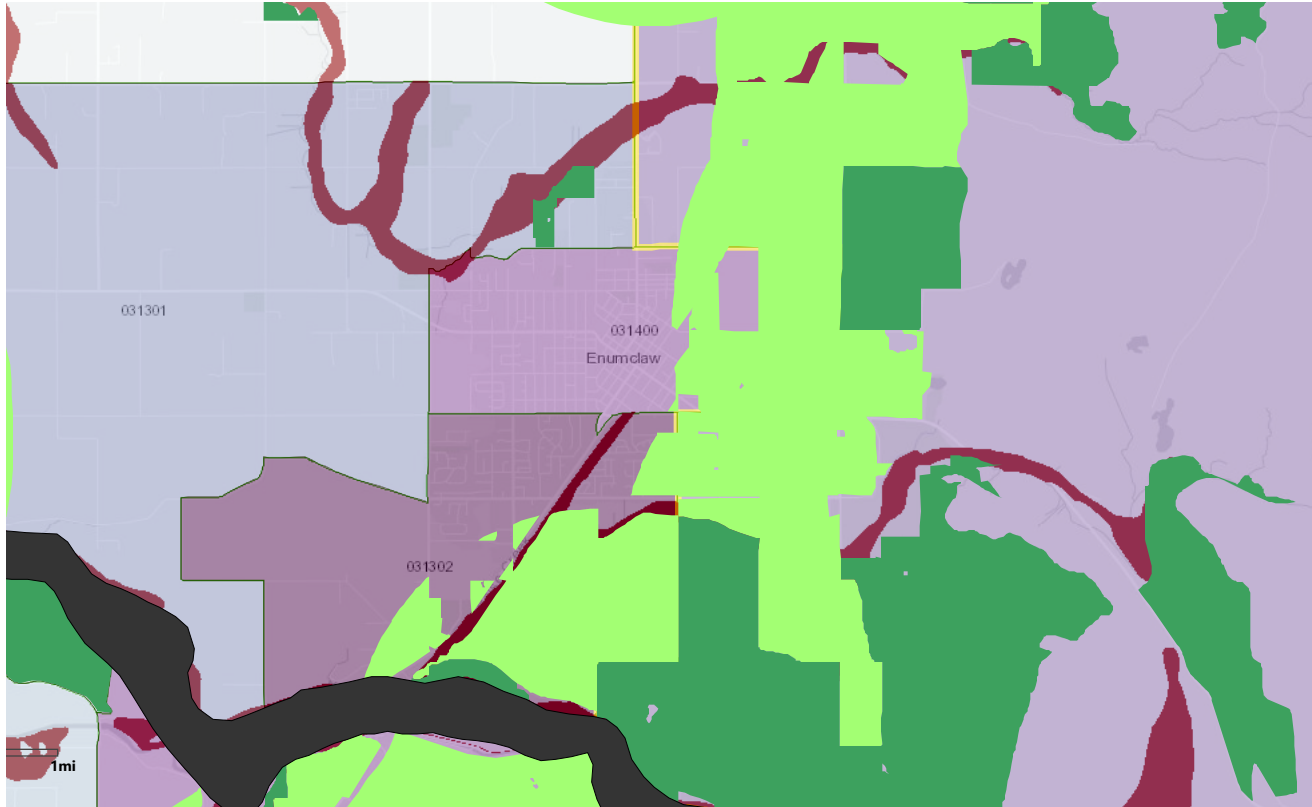
Legend: (High) 10 9 8 7 6 5 4 3 2 1 **(Low)**



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
- WA Ecology Cleanup Sites

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



Legend

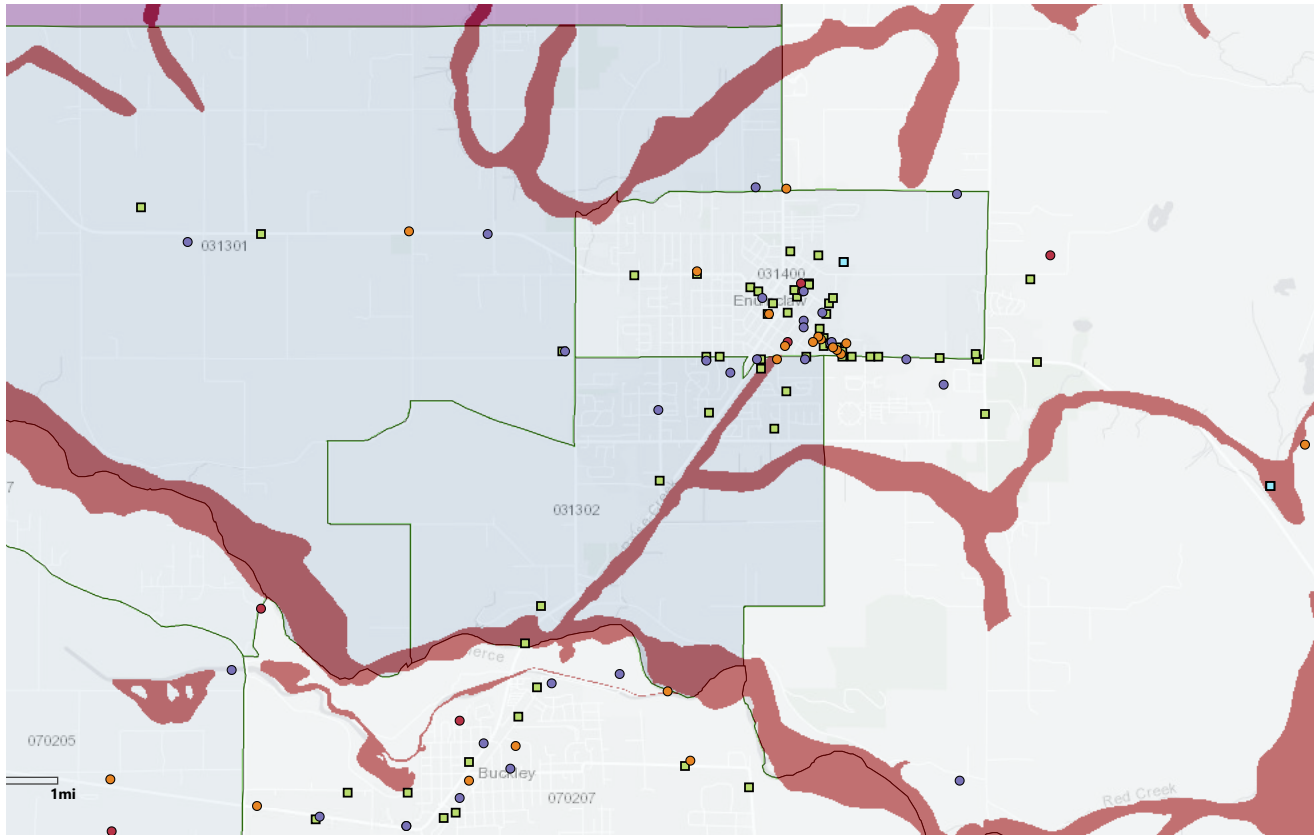
- National Flood Hazard Layer
- Current Wildfires
- Current Wildfire Area
- Accountable Communities of Health
- County Boundaries
- Legislative Districts
- Rural/Urban Tiers 2&4 CT
- Tribal Boundaries
- Wildland Urban Interface
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- 2015 Wildfire Burn Area
- 100-year Flood Zone
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- Care Facilities - Nursing Homes
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- 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
- 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

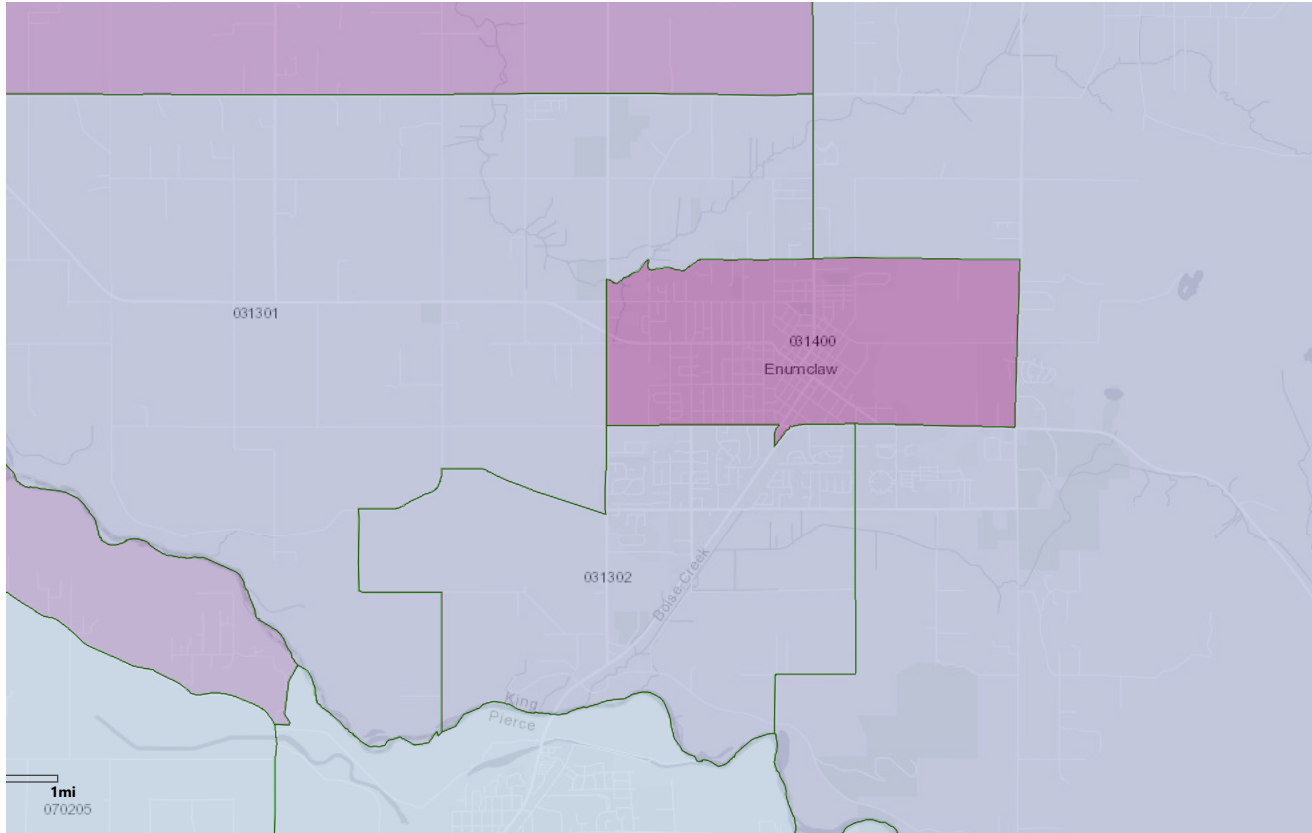
- City Limits
- Historical Redlining (HOLC)
- National Flood Hazard Layer
- Wildfire Smoke Days
- Climate Projections ~2050
- County Boundaries
- Electric Utilities - Investor
- Electric Utilities - Public
- Former Orchard Lands
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- Tribal Boundaries
- 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
 - Leaking container
 - Closed container
 - Monitoring station
 - Storage
 - Closed container

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
- 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
 - Remedial action
 - Cleanup action
 - Monitoring/assessment
 - Ongoing
 - Cleanup complete

Appendix G
Areas of Potential Displacement Risk

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ALL BUILDABLE / DEVELOPABLE LANDS

Natural Area

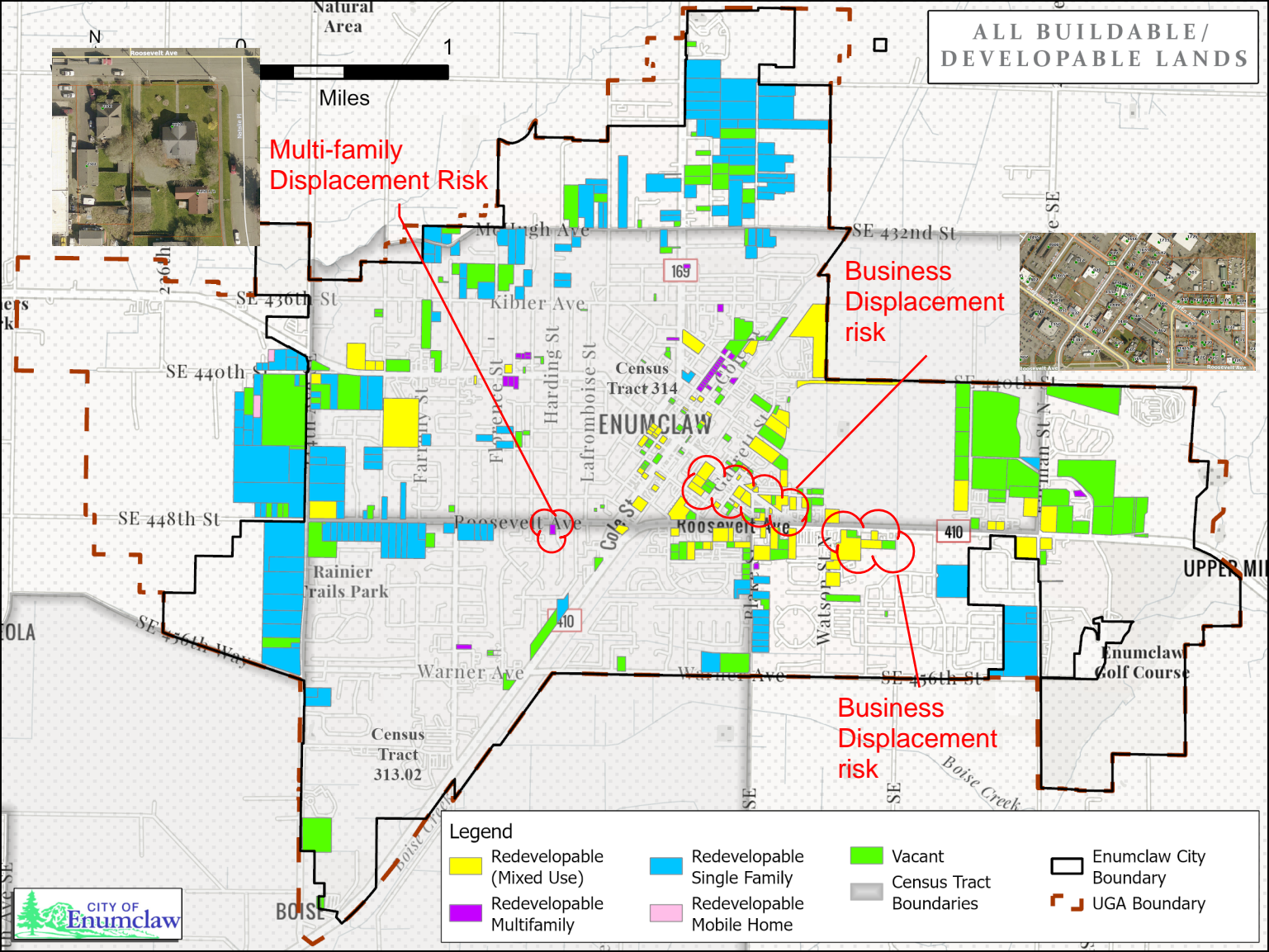
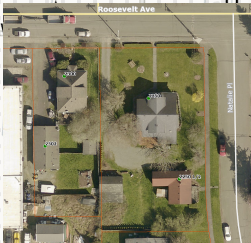
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Miles

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

