

Appendix B

Land Capacity Analysis and Adequate Provision to Accommodate All Housing Needs



REVIEW DRAFT

April 2024

Appendix B

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1. Introduction

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

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

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

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

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

2. Land Capacity Analysis Results

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

2.2 Land Capacity Analysis Results

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

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

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2.3 Accessory Dwelling Units

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

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

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

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

3. Planning For Income Segments

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

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

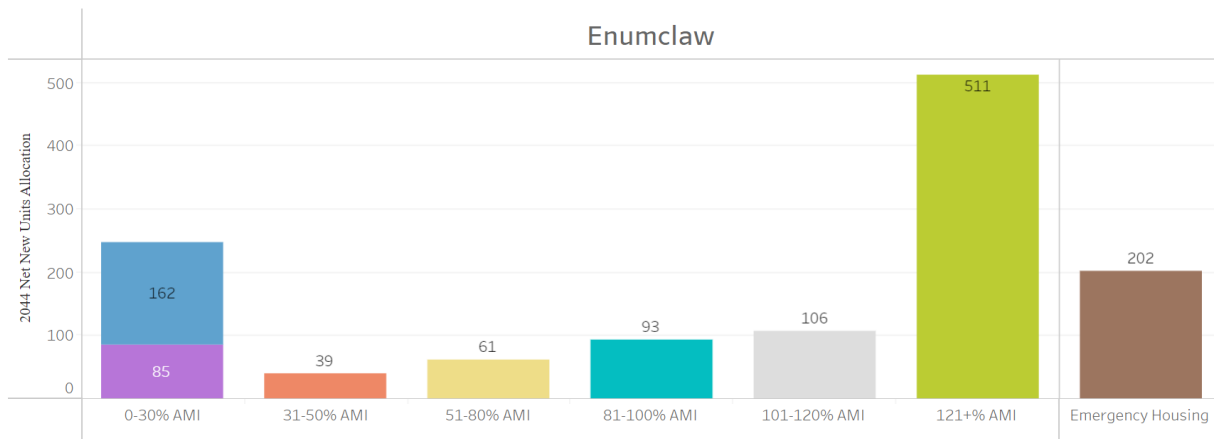
To determine if the City has land with adequate capacity to accommodate its housing targets for all economic segments and special housing needs, the following analysis was used.

3.1 Housing Growth Targets

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

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

Figure 1: City of Enumclaw Hight Targets 2019-2044



Source: King County Jurisdictional Housing Needs Allocations, 2023

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3.1 Zoning Categories

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

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

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

3.2 Applying Zoning Districts to Zoning Categories

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

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

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

3.3 Capacity By Household Income Segment

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

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

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

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

3.4 Capacity by Zoning Category

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

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

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

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4. Emergency Housing

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

Goal

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

Methodology

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

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

Results:

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

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

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

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

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

5. Adequate Provisions

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

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

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

5.1 Housing Production Trends and Barriers

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

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

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

5.2 Barrier Analysis

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

5.4 Housing to Employment

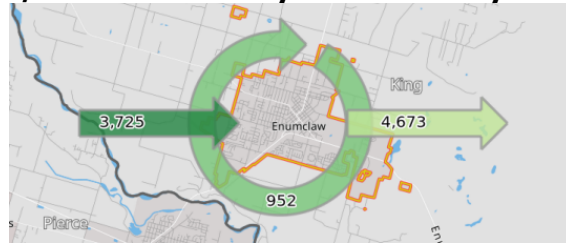
When reviewing housing and determining if the City is making adequate provisions for existing and projected housing needs for households in all economic segments of the community, it is important to take employment into account. Housing and employment are closely related because how much a household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

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

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

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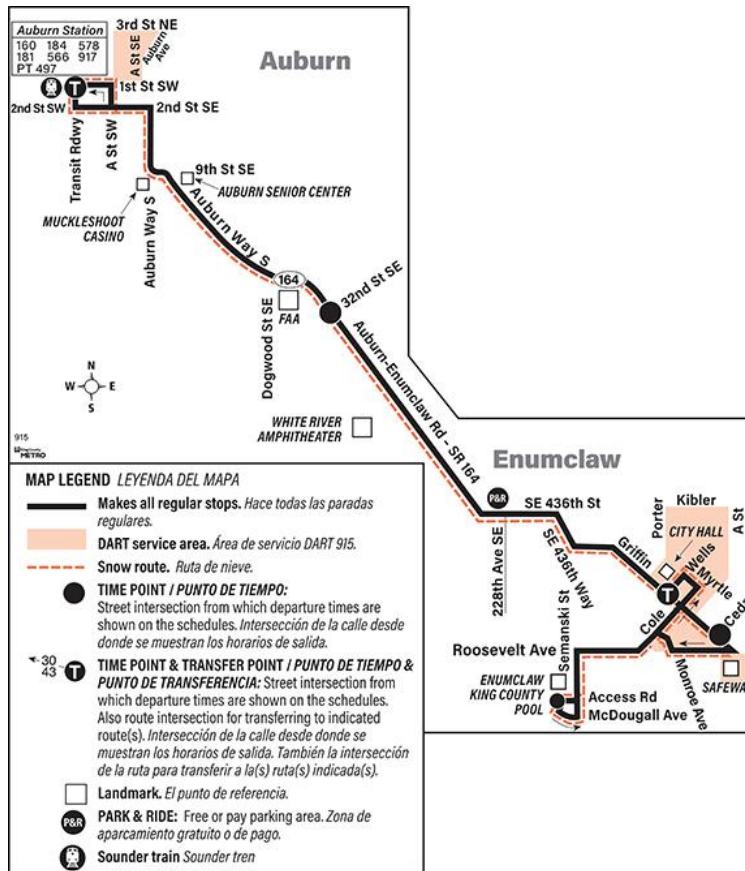
Figure 2 Inflow/Outflow of Primary Jobs in the City of Enumclaw, 2020



Source: United States Census Bureau, OnTheMap, 2020

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

Figure 3: Route Map – King County Metro Route 915



Source: King County Metro, 2023

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5.5 Adequate Provisions Checklist

Table 1: Moderate Density Housing Barrier Review Checklist

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

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Table 1: Moderate Density Housing Barrier Review Checklist

Table 1: Moderate Density Housing Barrier Review Checklist			
Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
		developments and not for developments with multi-unit buildings on one lot, it acts as a barrier for zero lot line developments.	
Prohibiting some moderate density housing types, such as: <ul style="list-style-type: none"> • Duplexes • Triplexes • Four/five/six-plexes • Townhomes • Cottage housing • Live-work units • Manufactured homes 	Yes	<ul style="list-style-type: none"> • All the listed housing types are allowed in the R-4 and PUD zones. • in the R-2 zone, duplexes are a conditional use (EMC 18.05.020(A)), which has deterred new duplex construction due to the additional permitting. Also, in the R-2 zone, duplex properties have a required separation of 300-feet (EMC 19.40.110(J)). In the past, the separation requirement has made it not possible for new developments to have more than one duplex and has limited duplexes as an option for infill development on existing lots. 	<ul style="list-style-type: none"> • Consider updates to its Residential Land Use Matrix (EMC 18.05.020(A)) to allow triplexes, four/five/six-plexes, townhomes, and live-work units in more than just the R-4 and PUD zoning districts. • Consider allowing duplexes as a permitted use in all residential zones. • Consider removing the 300-foot separation requirement for duplex properties in the R-2 zone (EMC 19.40.110(J)).
High minimum lot size	Yes	<ul style="list-style-type: none"> • In the R-3 zone duplexes are required to have a minimum lot size of 12,400 square feet (2 times the minimum lot size in the R-3 zone; EMC 18.05.020(B)(3)). This could 	<ul style="list-style-type: none"> • Establish comp plan goals and policies to consider smaller lot sizes through development regulations.

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Table 1: Moderate Density Housing Barrier Review Checklist

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

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Table 1: Moderate Density Housing Barrier Review Checklist

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

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

Appendix B

Table 1: Moderate Density Housing Barrier Review Checklist

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

Appendix B

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

Appendix B

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

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

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Table 2: Low-Rise Housing Barrier Review Checklist

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

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

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

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

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

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

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

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Table 4: Accessory Dwelling Units Barrier Review Checklist			
Barrier	Is the barrier likely to affect housing production? (yes or no)	Why or Why not? Provide evidence.	Actions needed to address barriers
Development Regulations			
<p>Consistent with HB 1337 (2023)</p> <ul style="list-style-type: none"> • Must allow two ADUs on each lot in urban growth areas; • May not require the owner to occupy the property, and may not prohibit sale as independent units, but may restrict the use of ADUs as short term rentals; • Must allow an ADU of at least 1,000 square feet; • Must set parking requirements based on distance from transit and lot size; • May not charge more than 50% of the impact fees charged for the principal unit; • Must permit ADUs in structures detached from the principal unit; • May not restrict roof heights of ADUs to less than 24 feet, unless that limitation applies to the principal unit; • May not impose setback requirements, yard coverage limits, tree retention mandates, restrictions on entry door locations, aesthetic requirements, or requirements for design review for ADUs that are more restrictive than those for principal units; • Must allow an ADUs on any lot that meets the minimum lot size required for the principal unit; • Must allow detached ADUs to be sited at a lot line if the lot line abuts a public alley, unless the city or county routinely plows snow on the public alley; • Must allow conversions from existing structures, even if they violate current code requirements for setbacks or lot coverage; and • May not require public street improvements as a condition of permitting ADUs. 	No	Addressed in EMC 19.34.070	None

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Table 4: Accessory Dwelling Units Barrier Review Checklist

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

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

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

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

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

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

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

– Starts on the next page –



MEMORANDUM

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

1. Background

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

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

Exhibit 1 – Housing Need under HAPT for Enumclaw

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

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

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

2. Methods and Assumptions

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



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

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

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

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

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

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

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

Exhibit 2 – Assumed Zones Serving Income Levels: No Change

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

3. Housing Capacity Outputs and Pipeline Projects

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

Exhibit 3 – Housing Capacity

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

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

³ Ibid.

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

4. No Change Scenario

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

Exhibit 4 – Assumed Densities: No Change Scenario

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

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

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

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

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

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

5. Smaller Lots for Starter Homes Scenarios

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

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

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

5.1 R-1 and R-2 lot size reductions

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

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

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

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

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

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

5.2 R-3 Lot Size Reduction

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

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

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

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

6. Increase Achieved Density in the R-4 Zone

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

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

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

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

7. Summary

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

Exhibit 10 – Scenario Summary Table

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



Appendix A

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

Assumed Allocation Ratios Table – No change

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



Appendix B

Buildable Acre Capacities and Deductions

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