
Racial equity and Displacement Analysis

CITY OF SNOQUALMIE

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I. Introduction

In 2022, the City of Snoqualmie received a Middle Housing grant from the Washington State Department of Commerce. The grant program was authorized by the 2022 supplemental state operating budget and was developed to support the adoption of ordinances authorizing middle housing types, along with conducting a racial equity and anti-displacement study. The intent is for cities to study their existing housing conditions, develop options to provide a greater variety of housing types, and identify any communities that may be at risk of racial discrimination or displacement.

The timing for this project is ideal, as the City is beginning the required 2024 periodic update to the comprehensive plan and development regulations. The Middle Housing study plays an even more important role in the update given recent legislative changes. In 2021, the Washington State Legislature amended the Housing Element requirements of the Growth Management Act (GMA) through [House Bill 1220](#).

The amendment strengthened the GMA Housing Element in a variety of ways. This includes modifying language from encouraging the availability of affordable housing to a requirement to plan and accommodate affordable housing to all economic segments of the population. This puts a greater responsibility on local government to plan for housing for low- and moderate-income households. Middle Housing types can help meet this need.

Housing Element amendments also include new requirements to analyze racially disparate impacts, displacement, and exclusion in housing. This report is focused on providing the City with initial information on each of these issues as it pertains to the City. The report's findings can then be utilized as part of the comprehensive plan update to assist in meeting new Housing Element requirements. Snoqualmie is taking the opportunity to address current challenges and proactively plan for the future as the community grows.

Excerpt from GMA Housing - Element RCW 36.70A.070(2)

- (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

Figure 1. Excerpt from GMA Housing Element (RCW 36.70A.070(2))

II. Report Purpose

The Racial Equity and Displacement Analysis Report is focused on addressing each of the Department of Commerce Middle Housing grant program requirements. These sync with new Housing Element requirements listed in RCW 36.70A.070(e-h):

1. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including: zoning that may have a discriminatory effect; disinvestment; and infrastructure availability. ([Link to analysis](#))
2. Identify areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations. ([Link to analysis](#))
3. Evaluate displacement risk of very low, low, and moderate-income households. ([Link to analysis](#))
4. Evaluate displacement risk of individuals from racial, ethnic, and religious communities which have been subject to discriminatory housing policies in the past. ([Link to analysis](#))
5. Evaluate displacement risk of locally owned businesses. ([Link to analysis](#))

Based upon the findings from this analysis, [which are provided within each report section and summarized at the end of this report in Section VI](#), a separate report that outlines a range of options the City of Snoqualmie can consider during the comprehensive plan update will be developed. This will include:

- Options and recommendations the city could consider (both policy and regulatory) to address any identified impacts from current policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing.
- Identification of anti-displacement strategies and programs which could minimize displacement of low-income residents resulting from redevelopment.

III. Background

Land Use Regulation & Relationship to Racial Inequity

Institutional racism can be defined as, “The perpetuation of discrimination on the basis of “race” by political, economic, or legal institutions and systems ... institutional racism reinforces inequalities between groups – e.g., in wealth and income, education, health care, and civil rights – on the basis of the groups’ perceived racial differences”¹. Harmful beliefs, policies, and regulations of the 20th century political environment influenced the practice of urban planning in the United States, which was another avenue through which discriminatory ideologies materialized. Two of these practices are discussed below.

In the early 20th century, before the Supreme Court’s *Buchanan v. Warley* decision in 1917, local ordinances in many communities explicitly prohibited black people from buying homes or occupying blocks where the majority of residents were white.

Exclusionary zoning also promoted the segregation of income levels and spread quickly across the country after the first zoning ordinances were established in the Northeast and Midwest. Suburbs developed in the post-World War II era were primarily occupied by wealthy white families, and, due to racially restrictive covenants, redlining, and other institutional practices, it was very difficult if not impossible for other racial and ethnic groups to achieve homeownership and build household wealth in the same way.

Requirements for large minimum lot and building footprint sizes, single residence per lot regulations, and the geographic separation and dependence on cars made the suburbs an expensive and exclusive place to live. Racial and economic discrimination often act as one in the same, as minority groups are more likely to be living in poverty when compared against white populations.

Redlining was a practice established by the Roosevelt administration in 1934 through the Federal Housing Administration (FHA) and Homeowner’s Loan Coalition (HOLC) and was ultimately institutionalized through the development of the FHA’s underwriting manual. According to the Fair Housing Center of Greater Boston, “Redlining is the practice of denying or limiting financial services to certain neighborhoods based on racial or ethnic composition without regard to the residents’ qualifications or creditworthiness”². The Fair Housing Act of 1968 prohibited discrimination based on race, color, national origin, sex, ability, and familial status; however, it did not make discrimination based on class illegal. As communities of color had been the target of harmful practices and policies up until this point, they were unable to build household wealth through housing security and real property ownership to the same degree as the white population and thus disproportionately fell into lower economic classes. This left them unprotected by the Fair Housing Act. Regulations like large minimum lot and building footprint sizes, limiting lots to one residence, and enforced car dependency put large swaths of communities functionally out of reach for communities of color. While these regulations do not

¹ Britannica, The Editors of Encyclopaedia. “institutional racism”. Encyclopedia Britannica, 20 Feb. 2023, <https://www.britannica.com/topic/institutional-racism>. Accessed 18 April 2023.

² “The Federal Housing Administration (FHA) Institutionalizes Racism.” 1934–1968: FHA Mortgage Insurance Requirements Utilize Redlining, <https://www.bostonfairhousing.org/timeline/1934-1968-FHA-Redlining.html>.

explicitly mention race or ethnicity, the effect was the same due to economic class disparities.

There were other significant ways racial discrimination shaped the field of urban planning. Ultimately the political, economic, and environmental landscapes of U.S. cities had lasting, generational impacts. Cities across the U.S., including in Washington State, have since recognized these impacts and have begun working towards reconciliation.

Even today, there are subdivisions and properties that have race-based restrictions. According to the [University of Washington](#), there are 342 subdivisions and 30,000 properties with such restrictions in King County; a relic of past practices which excluded housing opportunities for non-white people. Today housing exclusion is manifested in concentrations of lower income housing types in areas where investments in schools, parks, and infrastructure may be less than in more affluent areas.

This research did not uncover any restrictive covenants or restricted parcels in Snoqualmie.

The Puget Sound Region has experienced population and employment growth that has created a challenging housing environment. It is important for the City of Snoqualmie to address these issues and plan proactively for the future. This study is meant to identify if racial discrimination and displacement risks exist and to suggest policies to address these issues as the City plans for future growth and change.

Displacement

The Washington State Department of Commerce defines Displacement as:

“The process by which a household is forced to move from its community because of conditions beyond their control.”³

This is a different phenomenon than when property owners voluntarily sell their interests out of personal choice. There are several types of displacement, including:

- Physical displacement - Households are directly forced to move for reasons such as eviction, foreclosure, natural disaster or deterioration in housing quality.
- Economic displacement - Households are compelled to move by rising rents or costs of home ownership like property taxes.
- Cultural displacement – Residents are compelled to move because the people and institutions that make up their cultural community have left the area.

³ Washington State Department of Commerce, Growth Management Services. “Racially Disparate Impacts

Guidance”. 28 November 2022. https://www.ezview.wa.gov/site/alias_1976/37776/resources.aspx

The Puget Sound Regional Council (PSRC) has prepared a Displacement Risk map, which compiles a variety of displacement risk measures to rank locations and identify displacement risk. More information can be found on the PSRC [website](#).

The Displacement Risk map (Figure 2, right) indicates that the overall displacement risk in the Snoqualmie Valley region is low. Still, communities that have a relatively high share of poverty and ALICE⁴ households, like North Bend, could face greater displacement risk in the future if home prices continue to outpace income levels. And because housing is a regional issue, unequal displacement risk from community to community affects everyone.

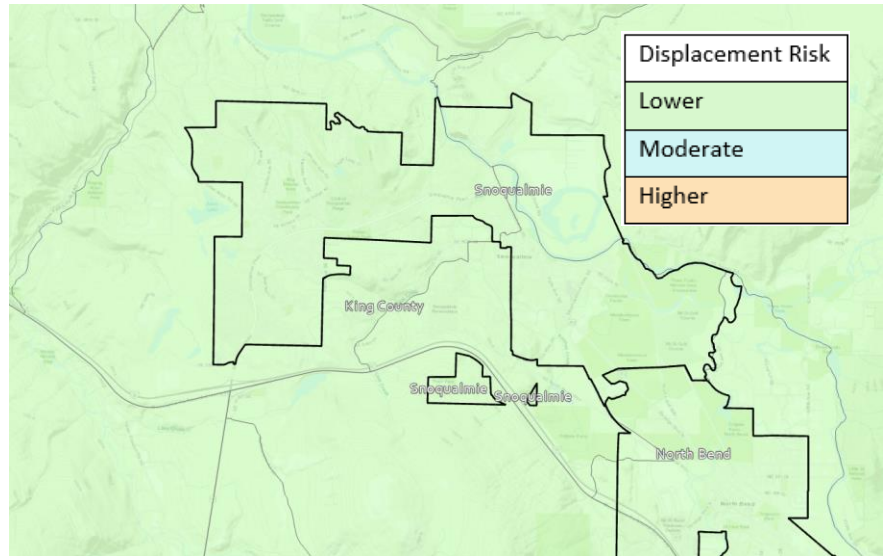


Figure 2. PSRC Displacement Risk Map

⁴ Asset Limited, Income Constrained, Employed. <https://www.unitedforalice.org/>

Household Income

The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs including the Public Housing, Section 8 project-based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities programs. HUD defines limits for Low, Very Low, and Extremely Low incomes relative to the HUD Area Median Family Income (HAMFI), which varies by county or metro area. In this report, the analysis will use the income brackets to the right to summarize data including household incomes greater than the HUD Low bracket.

Label	HUD Definition
Extremely Low Income	<=30% HAMFI
Very Low Income	>30% HAMFI and <=50%
Low Income	>50% HAMFI and <=80%
Moderate Income	>80% HAMFI and <=100%
Greater than HAMFI Median	>100% HAMFI

Figure 4. HUD Income Categories

HUD uses HAMFI defined for the Seattle-Bellevue metro area to calculate income limits for the City of Snoqualmie. Figure 4 is a breakdown of the income limits based on family size.

FY 2022 Income Limit Area	Median Family Income	FY 2022 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Seattle- Bellevue, WA HUD Metro FMR Area	\$134,600	Low (80%) Income Limits (\$)	66,750	76,250	85,800	95,300	102,950	110,550	118,200	125,800
		Very Low (50%) Income Limits (\$)	45,300	51,800	58,250	64,700	69,900	75,100	80,250	85,450
		Extremely Low Income Limits*	27,200	31,050	34,950	38,800	41,950	45,050	48,150	51,250

Figure 3. HUD Income Limits, Seattle-Bellevue Metro FMR Area

Source: HUD Annual Fiscal Year Income Limits Determination

Cost Burden

HUD considers a household to be cost burdened if they spend more than 30 percent of their income on housing costs, which can include mortgage payments and property taxes (for owner households), rent (for renter households), and utilities (for all households). A household is severely cost burdened if they spend more than 50 percent of their income on housing costs. Cost-burdened households often are forced to make tradeoffs in other areas of their spending, such as food, transportation, health care, or childcare. Excessive housing cost burden contributes to economic displacement pressures, to which households with lower incomes are especially vulnerable.

IV. Snoqualmie Community Profile

A community profile outlines existing conditions in the City to help analyze equity and displacement risk. This includes community demographics and current housing affordability information. The following data have been collected and summarized from the Housing Strategy Plan (HSP) prepared for the City of Snoqualmie in May of 2023.

Snoqualmie is majority white, and the primary language spoken is English.

Of the Snoqualmie residents of one race (Figure 5), 81 percent are White, 13 percent are Asian, 0.5 percent are Black or African American, and 0.1 percent are American Indian and Alaska Native alone. When compared against King County, Snoqualmie is somewhat less diverse.

According to the U.S. Census Bureau (Figure 6), the dominant language spoken at home by Snoqualmie's residents who are 5 years of age and above is English (84.7 percent). The second most spoken language is other Indo-European languages (7.9 percent). Smaller percentages of households speak Asian and other Pacific Island languages and Spanish.

	Population	Percent of Population
White	11,005	81.2%
Black or African American	69	0.5%
American Indian and Alaska Native	10	0.1%
Asian	1,792	13.2%
Native Hawaiian and Other Pacific Islander	0	0.0%
Some other race	64	0.5%
Two or more races	610	4.5%

Figure 5. Snoqualmie population by racial group of one race
Source: US Census Bureau, ACS 2020 5-Year Estimates, Table B02001

- English only
- Spanish
- Other Indo-European Languages
- Asian and Pacific Island Languages
- Other

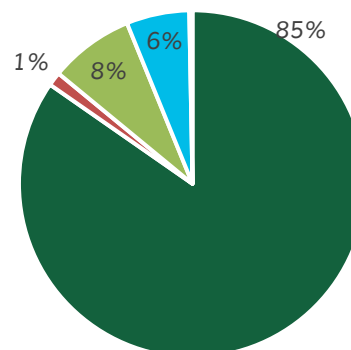


Figure 6. Languages spoken at home, population aged 5 and over
Source: US Census Bureau, ACS 2020 5-Year Estimates, Table DP05

Snoqualmie has many young families.

Since housing needs change over a person's lifetime, it is important to track shifts among age cohorts to anticipate expected demand.

Snoqualmie's age makeup is concentrated first in adults ages 35 to 44, and then in children ages 5 to 14. This age distribution indicates that the city is home to a large number of families with school-aged children.

This age distribution means that if today's residents age in the community, by 2040, around a quarter of Snoqualmie's current residents would be 65 or older.

Increased demand, housing scarcity, rising costs, and lagging household incomes particularly for households who own their home.

ACS data from three 5-year estimates between 2006 and 2021 showed growth in both median rents and median home values. In estimates between 2006 and 2021, the median home value in Snoqualmie rose from \$468,400 to \$681,500, a change of 31 percent; in the same period King County experienced a 44 percent increase in median home values. Similarly, estimates between 2006 and 2021 Snoqualmie median rent rose from \$1,629 to \$2,429, a 33 percent increase; in the same period, King County's median rent increased by 41 percent. While Snoqualmie has experienced a slower increase in housing cost compared to King County, Snoqualmie median rents and home values have been consistently higher than the counties. On average, Snoqualmie had 7 percent higher median homes values

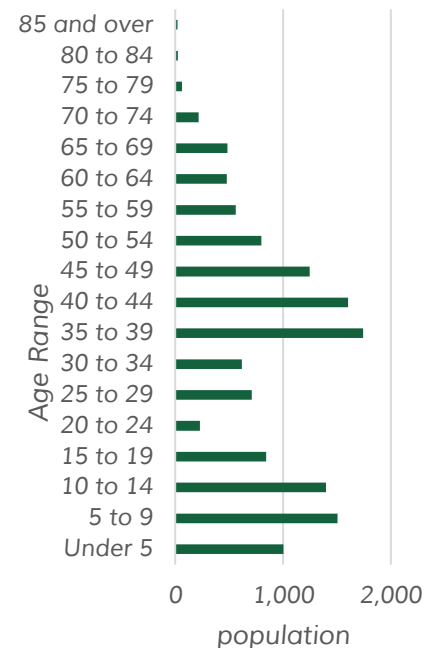


Figure 7. Population by age range
Source: US Census Bureau, ACS 2020 5-Year Estimates, Table S0101

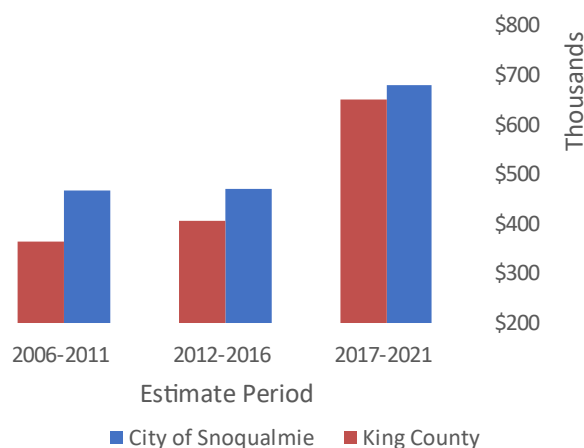


Figure 9. City and County Median Owner-Occupied Unit Value
Source: U.S. Census Bureau; American Community Survey 5-Year Estimates, Table DP04

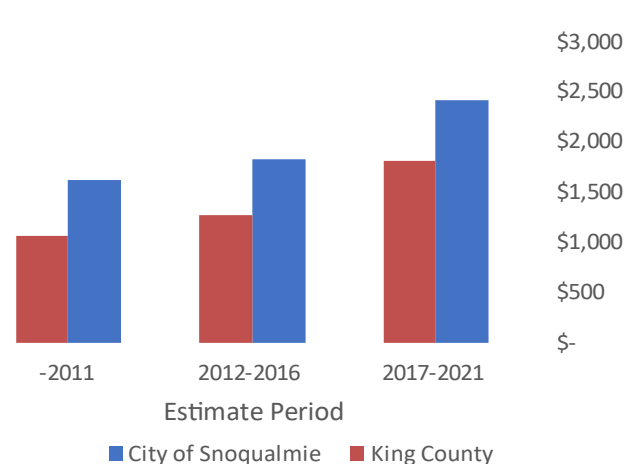


Figure 8. City and County Median Rents
Source: U.S. Census Bureau; American Community Survey 5-Year Estimates, Table DP04

and 19 percent higher median rents than King County. The figures below show estimates for how median rents and home values have changed between 2006 and 2021.

Alongside housing cost increases, the median household income in Snoqualmie was \$116,020 in 2010 and \$159,450 in 2020, for an increase of 37 percent and an average annual increase of 3.2 percent. Median income for households who own their unit increased from \$123,795 in 2011 to \$167,768 in 2021, an increase of 35 percent. Median income for households who rent their housing unit increased from \$66,744 in 2010 to \$95,896 in 2021, an increase of 44 percent.

This suggests that the incomes for both renters and owners have largely kept up with the rising cost of homes to buy and rent. Home prices have risen by 34 percent and the incomes of homeowners have risen by 35 percent. Rental rates have risen by 43 percent and the incomes of renters have increased by 44 percent.

Cost Burden is prevalent throughout the population.

In HUD-CHAS data compiled from the 2015-2019 American Community Survey data, 32 percent of Snoqualmie renter-occupied households and 21 percent of owner-occupied households were cost burdened. The majority of cost burdened households have incomes greater than the median family income. This only accounts for 9 percent of the households in that income bracket, but this nevertheless speaks to the housing pressure that some higher-income households face in Snoqualmie. Households with very low incomes have the highest percentage of cost burdened households.

	Renter Households		Owner Households	
	> 30%	> 50%	> 30%	> 50%
Cost Burden				
Household Income <= 30% HAMFI	45	265	70	115
Household Income >30% to <=50% HAMFI	130	415	115	70
Household Income >50% to <=80% HAMFI	330	10	55	55
Household Income >80% to <=100% HAMFI	155	0	105	20
Household Income >100% HAMFI	20	30	240	10
Total	680	720	585	270

Table 12. Cost burden by income, owners and renters
Source: HUD-CHAS 2015-2019 Data (Table 8)

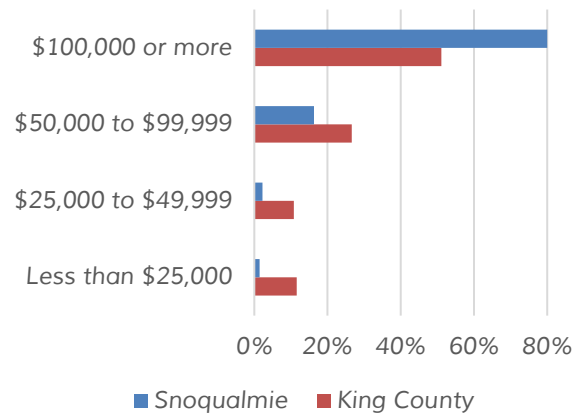


Figure 10. Household income ranges
Source: US Census Bureau, ACS 2021 5-Year Estimates, Table S1901

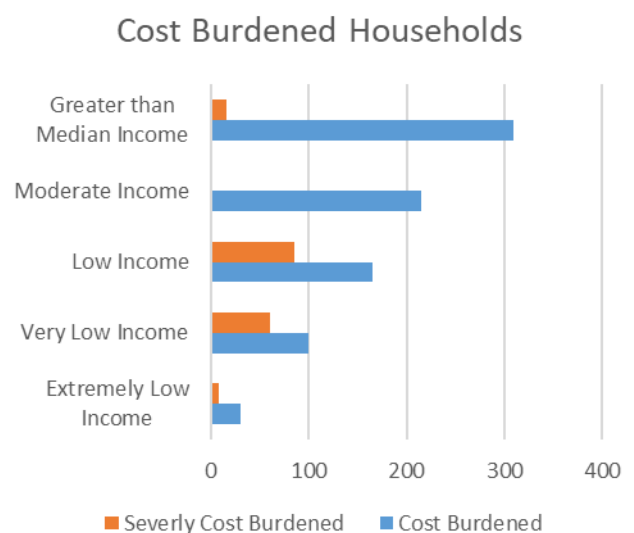


Figure 11. Snoqualmie Cost Burdened Households
Source: 2015-2019 HUD-CHAS Data (Table 8)

V. Analysis

This section will analyze each of the grant requirements (numbered below) outlined in the “Report Purpose” section above.

Policy Analysis

1. **Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including: zoning that may have a discriminatory effect; disinvestment; and infrastructure availability.**

The Washington State Department of Commerce Racially Disparate Impacts guidance has been utilized to evaluate existing City of Snoqualmie Housing policies which could result in racially disparate impacts, displacement, and exclusion in housing.

When evaluating existing Housing Element policies, the Department of Commerce suggests asking:

- Does the policy contribute to racially disparate impacts, displacement, or exclusion in housing? (for example: by making large areas of the city effectively “off-limits” to most types of housing except single-family houses?)
- Is the policy effective in accommodating more housing? If not, does it cause disparate impacts, displacement or exclusion in housing?
- Does the policy increase displacement risk? If so, can this be mitigated through policies or actions?
- Does the policy provide protection to communities of interest from displacement?

The policy evaluation also considers language which has been historically utilized to marginalize certain communities. This could be policies which speak to segregating certain housing types, enforcement policies which could impact those with lower incomes to a great extent, or references to things like “community character” or other vague phrases which could communicate exclusionary housing practices.

The following table includes all the current Housing Element policies and evaluates them for support of inclusive housing practices as follows:

Supportive = supports a valid housing approach which achieves the GMA Housing Element goal for housing.

Approaching = supports an inclusive housing approach but could use minor changes to address racially disparate impacts, displacement, or exclusion in housing.

Challenging = policy could use changes or modifications to meet GMA Housing Element goals

N/A = Not applicable

Policy	Evaluation	Explanation
GOAL HO 1: The integrity of Snoqualmie's existing older neighborhoods has been maintained to provide a range of diverse, affordable housing choices that supports the community's character and distinctiveness.	Approaching	"Integrity", "character", and "distinctiveness" are difficult to define. "Integrity" and "character" in particular are words that can encode bias, prejudice, or exclusion. If an existing older neighborhood or area is majority-white, for example, policy language that seeks to protect the "character" or "integrity" of that area can present as unwelcoming to people who may have different backgrounds than the people who currently live there. The existing neighborhoods containing Pickering Court and Panorama Apartments provide affordability in two distinct areas, so this goal could be made more supportive with more precise language.

Policy	Evaluation	Explanation
HO 1.1: Maintain zoning and development regulations that support the continued integrity and ongoing residential use of existing older neighborhoods and housing wherever feasible.	Approaching	This policy is vague and can be read to support assisting people living in older neighborhoods to stay in those neighborhoods. If these existing older neighborhoods and housing types are predominately single-family in nature, this would be considered exclusion in housing. Snoqualmie's older neighborhoods, in actuality, do already contain a range of housing types. Changes to policy language, such as simply removing the words "continued integrity" and adding language on maintaining infrastructure and access to opportunity in older neighborhoods would help alleviate this.
HO 1.2: As available, seek funding to assist homeowners in the 100 year floodplain with housing elevations.	Supportive	This is a sound policy for Snoqualmie and supports efforts to combat displacement. Consider adding "property owners" to this policy to ensure help is available for the duplexes and triplexes located in the floodplain as well.

Policy	Evaluation	Explanation
HO 1.3: Make street, storm drainage, sidewalk, streetscape and other infrastructure improvements as appropriate to support revitalization of housing, protect significant capital investments, avoid higher costs from deferred maintenance, and preserve property values.	Supporting / Approaching	This policy is mostly sound, although the last clause regarding preserving property values could use a re-examination. This could be interpreted as supporting requirements to do expensive frontage improvements as a result of minor tenant improvements in the name of preserving property values. However, such improvements do not require frontage improvements that are typically required with platting, i.e. short plat and subdivision. Lack of improvements could create inequity of quality neighborhoods.
HO 1.4: Work with Residential Owners Associations like the Ridge ROA to implement comprehensive plan policies.	Supportive / Approaching	This policy has to walk a fine line, as many requirements of ROAs can be more restrictive than cities can be under the Growth Management Act. As long as the other policies in the plan are brought up to date as needed, this is a sound policy.
HO 1.5: Support the rehabilitation or relocation of existing, structurally sound housing, and provide referrals where appropriate to agencies such as to the King County Home Repair program to facilitate reuse.	Supportive	This is a strong policy for combating displacement. Could use more specificity as to whether the relocation portion of this is specific to the floodplain and what improvement would be needed, such as elevations to keep occupants safe.

Policy	Evaluation	Explanation
HO 1.6: Assist in the effort to reach low-income households eligible for free weatherization through existing programs.	Supportive	Generally good policy. Could be made somewhat more specific in terms of what "the effort" means. What specifically is the city's role (i.e., distributing information, provide grant money for improvements, conducting outreach, providing data, sending out mailers, etc).
GOAL HO 2: A sufficient mix of housing types, sizes, costs and densities enables current and future citizens from a wide range of economic levels, age groups and household make-ups to live within the City and provides housing to meet the needs of local employees.	Approaching	Consider changing language from "citizens" to "residents" to more accurately capture all who may live in the city. Could be made more supportive by stating "ALL" economic levels rather than "a wide range".
HO 2.1: Encourage innovative housing that helps promote City goals for affordability, high-quality sustainable design, and housing to meet diverse household sizes, types and age ranges, and consider flexibility in density and design standards to support such projects.	Supportive	This is a good policy that effectively supports affordability and type of housing to meet a wide range of needs as well as the tools needed to accomplish this.
HO 2.2: Encourage accessory dwelling units and small-lot housing through appropriate regulation and incentive programs, with regulations that minimize procedural requirements and address neighborhood compatibility.	Supportive Approaching	This is a good policy, but "compatibility" is hard to define. The recent changes in state law related to ADUs regulates this at the code level. When the city implements code changes to comply with HB 1337, that would be a good opportunity to examine other ways policy can support dimensional regulations and design standards for ADUs.

Policy	Evaluation	Explanation
HO 2.3: In residential areas with alley access, encourage and allow for small-lot and cottage housing subject to regulations to address issues of neighborhood compatibility, such as reduced or aggregated parking areas, streetscape orientation, common amenities and open space.	Supportive	This is a good policy that is specific about where small-lot and cottage housing is encouraged and what other standards should apply.
HO 2.4: Assure that land use regulations allow for the siting and operating of emergency, transitional and permanent special needs housing, and ensure that sufficient land is zoned to allow their location near shops, services and transit.	Approaching	This policy could be made more specific as a result of changes to Housing Element requirements for permanent supportive and transitional housing and where they must be allowed. Additional language supporting these housing types in all the areas required in the Housing Element would be a good next step, as well as possibly getting more specific about safe non-automobile access to shops, services, and transit, rather than just proximity.
HO 2.5: To increase opportunities for seniors to live in accessible housing with nearby services, allow and encourage a range of housing types for seniors, such as independent living, various degrees of assisted living, and skilled nursing care facilities, and provide incentives for developing senior housing such as reduced or waived permit fees, density bonuses and reduced parking requirements.	Supportive	This is a good policy that provides solid support for a range of senior housing opportunities and types as well as incentives for how the city can encourage them.

Policy	Evaluation	Explanation
HO 2.6: Require some number of living units in Planned Residential zones to be designed with Universal Design principles, so that there is at least one no-step entrance, the master bedroom suite or all bedrooms are on the ground floor and the floor plan is wheelchair-friendly.	Approaching	This is a good policy, except that there is no developed housing with the Planned Residential zoning. (This is highlighted and discussed in the Housing Action Plan as well.) The City could consider also applying this to the R-3 zone if it intends to implement that zone in future annexation areas.
HO 2.7: Support the development of rental apartments that are appropriate for families with children, including the provision of services, recreation and other amenities as feasible.	Supportive	This is a sound policy. It could be somewhat improved with additional support for incentives or requirements to make that happen, as offered in HO 2.5 and HO 2.6.
GOAL HO 3: A sufficient amount of quality affordable housing with healthy living environments is available to meet the needs of low and moderate-income residents, and provide the opportunity for our business' lower-wage employees to live within the City.	Approaching Supportive	This should be updated to reflect the income bands of low-, very low-, and extremely low-income households as adopted in the CPPs and as added to the Housing Element in RCW 36.70A.070(2)(a)(i) .
HO 3.1: Strive to meet the targets established and defined in the Countywide Planning Policies for low- and moderate-income housing as a percentage of projected overall household inventory.	Approaching Supportive	This should be updated to reflect the income bands of low-, very low-, and extremely low-income households as adopted in the CPPs and as added to the Housing Element in RCW 36.70A.070(2)(a)(i) .

Policy	Evaluation	Explanation
HO 3.2: Work with County, State, Federal and non-profit organizations to create and retain affordable housing, and apply for federal and state housing funds available to assist in the development or improvement of affordable housing.	Supportive	This is a strong policy that supports the Housing Strategy Plan's recommendations on building partnerships with affordable housing partner organizations.
HO 3.3: Evaluate the supply and condition of affordable housing in the City every five years to measure the effectiveness of City housing policies, regulations and incentives and provide assistance to retain low-income units where feasible.	Supportive	This might be part of the 5-year check-in (implementation progress report) for comprehensive plans as established by HB 1241, which passed in 2022 and was signed into law as RCW 36.70A.130 (9). Consider adding this to this policy.
HO 3.4: To the maximum extent feasible, require affordable housing to be: provided in new Mixed Use, Planned Residential and Innovative Development district projects; either proximal to services or dispersed throughout new developments; and include an appropriate mix of rental and owner-occupied units that are made available to people with qualifying incomes.	Approaching	This seems supportive of using MFTE more broadly to provide affordability, which is a good strategy to meet housing element requirements. Consider defining affordability using the categories of low-, very low-, and extremely low-income as defined in the Housing Element. Could also consider adding R-3 to this mix as well when it is implemented. There seems to be potentially a conflict inherent in "proximal to services" versus "dispersed throughout new developments." This is a genuine subject of debate in planning and should be explored more fully in the comprehensive plan update.

Policy	Evaluation	Explanation
HO 3.5: With the cooperation of other government entities, non-profit housing organizations, and housing developers, investigate alternative means for keeping affordable housing affordable, so that units do not immediately appreciate beyond the reach of applicable income levels.	Supportive	This is a sound policy that provides support specifically for maintaining affordability of units that are existing or new affordable units.
HO 3.6: Consider strategies and mechanisms such as density bonuses, expedited permit processes, and where allowed by law, tax waivers and relief from development fees, to encourage very low- and low-income housing development.	Supportive	This is a sound policy. Also consider adding "extremely low-income" to ensure this also applies to households at the lowest end of the income spectrum. Expedited permit review could be removed as it is already provided for in HO 3.7.
HO 3.7: Grant priority in the development review process for projects providing 15 percent or more of the proposed residential units as affordable units.	Supportive	This is a good concept. This means that if 15 percent or more is affordable the project jumps to the front of the queue. Also, the City could define more specifically what "affordable" means in this context (in terms of percent AMI, for example).
HO 3.8: Encourage development and utilization of Community Land Trusts as one tool for addressing the community's affordable housing needs.	Supportive	Generally a good policy. The City could also consider defining what "encourage" might look like in this context – offering favorable ground lease terms on city-owned land, for example.
GOAL HO 4: The City supports sustainable housing design through applicable code, programs, partnerships and educational efforts.	Supportive	This is a good general goal and supportive of the Housing Strategy Plan's options.

Policy	Evaluation	Explanation
HO 4.1: To reduce housing operation and maintenance costs, energy use and impact on natural resources, encourage the use of high quality, durable, and low-maintenance building materials, high-efficiency energy systems, and environmentally responsible building principles in all new housing and renovation projects.	Approaching	This is generally a good idea. However, care should be taken to ensure that encouraging these features does not come at the expense of affordability. The City could consider adding language (or another policy) supporting anything the City can do to balance the increased costs that come with these features and ensure that affordability is still achieved.
HO 4.2: Provide education to citizens on green housing renovation options and energy conservation.	Supportive	This is generally a good idea, if such education and funding could lower the cost of daily housing expenses, i.e., electricity or recycling run-off water.
HO 4.3: Require new housing developments to provide streetscape improvements, open space, and recreation amenities to support the City's urban forest goals, establish a sense of neighborhood cohesion and permanence, and promote community distinctiveness.	Challenging	As with a couple other policies, "cohesion and permanence" and "distinctiveness" are hard to define. Consider more specific language here such as subdivisions or units proposed greater than 6 would trigger this, as the policy as written could in some cases conflict with the goal of providing housing that is affordable. ADUs do not trigger streetscape improvements, but infill or redevelopment of existing lots could be challenging to make affordable if small projects are required to do streetscape improvements.

Policy	Evaluation	Explanation
HO 4.4: Utilize floor area ratio and other standards as appropriate to promote housing that is affordable, in-scale with the lot, and has reduced environmental impacts over its lifetime.	Approaching Supportive	This is generally sound policy. However, the city should try to make sure that when affordable housing for families with children is being pursued (HO 2.7), an FAR does not work at cross-purposes, since FARs can often incentivize more and smaller units than would otherwise be built.
HO 4.5: Maintain a Housing Inspection and Code Enforcement Program to ensure the continued safety and viability of rental housing, with annual Building Department inspections.	Approaching	This is a good policy, and the City could consider additional language supporting its voluntary compliance efforts, which help property owners to bring them into compliance and avoid displacement through condemnation.

Findings

- The City of Snoqualmie has generally strong housing policies that provide support for housing identified in the Growth Management Act (GMA) including:
 - Providing a variety of housing types at different affordability levels
 - Incentivizing affordable housing
 - Providing more options for first time home buyers
 - Support for Housing types, such as ADUs
 - Providing for housing diversity
 - Promoting retention of older housing stock
 - Providing housing to meet market demand
- The City will need to update housing policies as part of the 2024 Comprehensive Plan update to provide a greater focus on new language added to Housing Element requirements (RCW 36.70A.070(f) and (h)). This includes policies to address racially disparate impacts, displacement, and exclusion in housing. In many cases, this only requires updating existing policies. Policy suggestions will be provided as part of a follow-up report.
- There are a few policies identified where changes should be considered to provide more inclusive language. Suggestions for policy change will be provided as part of the follow-up report.

Displacement Risk Analysis

2. Identify areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations.

Based upon PSRC mapping, the City of Snoqualmie is at low risk for significant displacement. Proactive policies can be developed to get ahead of these issues and to be ready when displacement occurs. While not mentioning displacement, the City already has policies that are proactive in this way, such as promoting the retention of housing that is affordable and housing assistance for people living in the floodplain.

- a) Snoqualmie will need to make changes to its comprehensive plan and additions to its zoning regulations to accommodate projected growth but is constrained from causing much displacement in doing so, since the eastern half of the city is in the floodplain and has limited redevelopment potential, and the western half of the city is almost entirely within a master-planned community, much of which is quite new. Policy options which could limit redevelopment displacement risks will be explored as part of the follow-up report.
- b) There are a few small, and two larger, properties with capacity where the City is contemplating pursuing strong housing affordability. One of these is city-owned. This could likely help offset any limited displacement that may result from changes to zoning development regulations. This may require development of a right of first refusal policy when pursuing a development agreement or other mechanism for ensuring affordability on city-owned land.
- c) Some business displacement **may** result from some of the potential land use changes. The City should consider economic development policies in its comprehensive plan update to assist businesses with displacement, since this also affects the workforce and thus middle housing issues.

3. Evaluate displacement risk of very low, low, and moderate-income households.

To evaluate risk for displacement, there are many risk indicators that can reveal possible past displacements or trends that may indicate future displacement risk. Some displacement risk indicators that were utilized in analysis of displacement risk of very low, low, and moderate-income households analysis were:

- a) Household Income
 - b) Housing Cost Burden
 - c) Affordability of Rental Housing
- a) Household income

How this indicator relates to displacement

Household income is not by itself an indicator of displacement risk; rather, it is a factor that feeds into the calculation of displacement risk and provides outside context for how the community is changing.

Analysis

Analysis for the City of Snoqualmie was based on HUD data showing a total of 4,365 occupied housing units (households) in the period of 2015-2019. Of these, 84.8 percent are owner occupied and 15.3 percent are renter occupied.

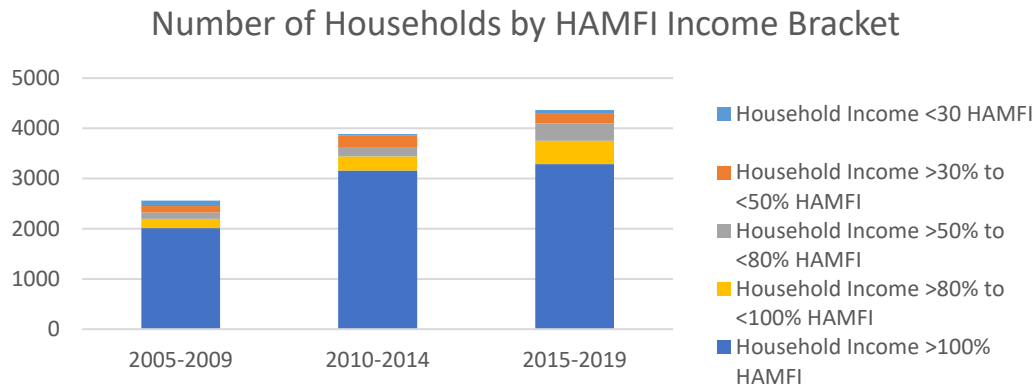


Figure 13. Number of Households by HAMFI Income Bracket
Source: HUD-CHAS Data (Table 8)

Income bracket household counts have fluctuated since 2005, but there has been little overall change since then in the distribution. Changes in HAMFI can be observed throughout the period from 2005-2019, yet the most income brackets experienced household count changes of around 3 percent or less.

Further evaluation of the income bracket data reveals differences in income brackets between owner and renter-occupied households. The most notable change in renting households was a decrease of 9 percent in the number of household incomes between 30 and 50 percent HAMFI; owner households have

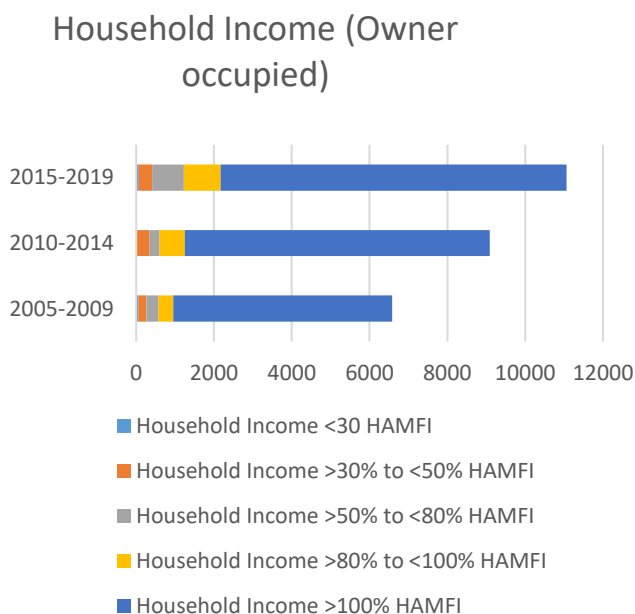


Figure 15. Household Income (Owner occupied)
Source: HUD-CHAS Data (Table 8)

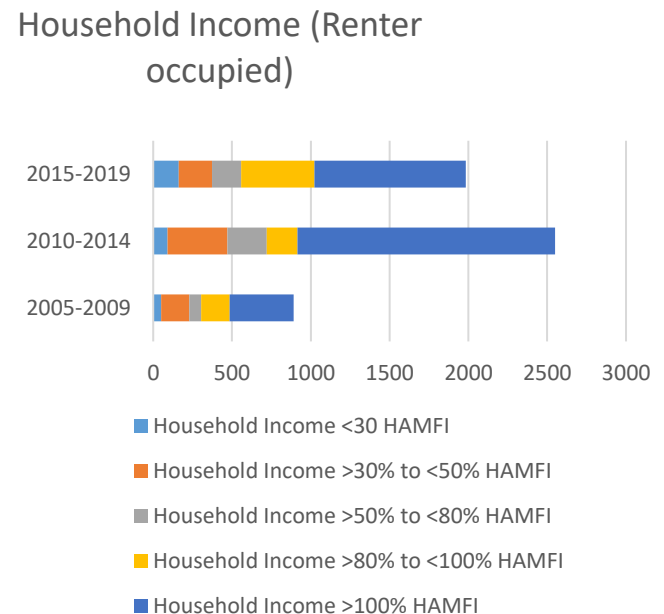


Figure 14. Household Income (Renter occupied)
Source: HUD-CHAS Data (Table 8)

seen a steady decrease in the share of households making more than 100 percent HAMFI.

Income category distribution for renter households in Snoqualmie have changed little overall but remain higher in the lower income brackets. Despite this difference in income bracket percentages by tenure, owner-occupied households generally outnumber the renter-occupied households with incomes below 50 percent HAMFI.

Household Incomes less than 50% HAMFI

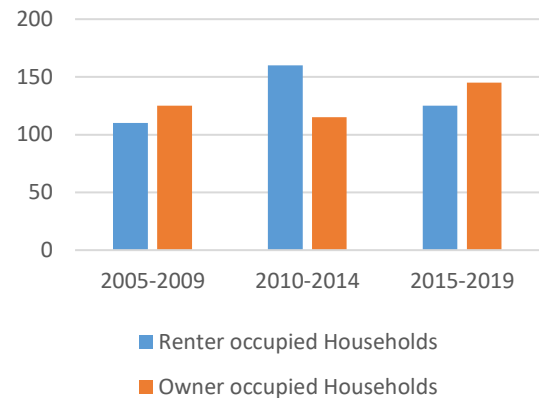


Figure 16. Household Incomes less than 50% HAMFI

Source: HUD-CHAS Data (Table 8)

Findings

- Renting households have significantly lower incomes than owning households.
- The number of renting households that make less than 30 percent of the HAMFI has increased substantially over the last 13 years. This indicates increasing levels of economic displacement pressure.

b) Housing Cost Burden

HUD considers a household to be housing cost burdened if they spend more than 30 percent of their income on housing costs, which can include mortgage payments and property taxes (for owner households), rent (for renter households), and utilities (for all households). A household is severely housing cost burdened if they spend more than 50 percent of their income on housing costs.

How this indicator relates to displacement

Housing cost burden increases the risk of displacement in multiple ways. As more of a household's income goes to housing, they have less money to spend on other essentials such as food and transportation. Cost-burdened households may choose to move to a more affordable area or may be forced to move -- by eviction or foreclosure -- as a result of their inability to continue paying for housing. Severely housing cost burdened households in the lowest income categories generally are at the greatest risk of displacement with the potential to become homeless.

Housing cost burden is an indicator of **indirect/economic displacement**, as increasing levels of housing cost burden can ultimately force people out of their housing, their neighborhood, or even the city entirely.

Analysis

Between 2005 and 2019, housing cost burden in Snoqualmie has generally decreased, with overall percentage of households spending more than 30 percent of their income on housing costs being lower in the 2015-2019 HUD-CHAS data than in the 2005-2009 HUD-CHAS data. When analyzing this data further, the data reveals a contrast between renters and homeowners in their cost burden status. Over the period of analysis, less owner-occupied households have experienced housing cost burden while more renter-occupied households have been experiencing cost burden. It is common to see higher rates of cost burden for renting household as opposed to owner occupied households; the shift in the ratio of cost-burden is notable though as it indicates that renters are being disproportionately affected by cost burden which translates to an increased level of displacement risk for these burdened households.

Housing cost burden can be further broken down by income bracket. This analysis shows decreasing rates of cost burden across most income brackets except for an increase in the percentage of very low income households (30-50 percent HAMFI) being cost burdened, which has substantially increased since the 2005-2009 HUD-CHAS estimates, see table 18. This

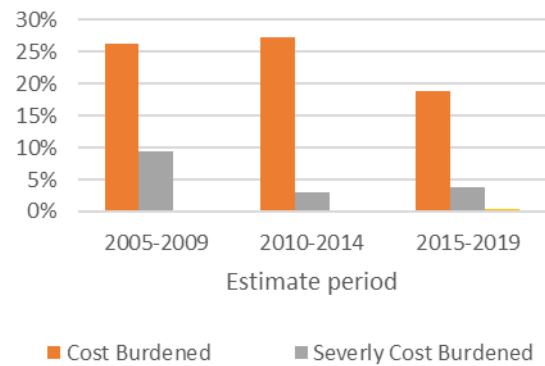


Figure 17. Percent Housing Cost Burdened Households
Source: HUD-CHAS Data (Table 8)

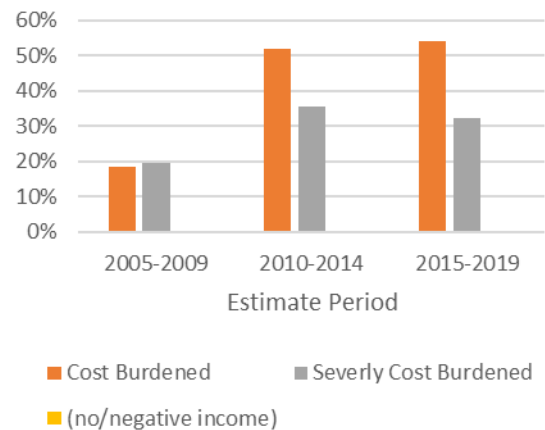


Figure 20. Percent Housing Cost Burdened Low Income Households
Source: HUD-CHAS Data (Table 8)

Cost Burdened Households (Owners)

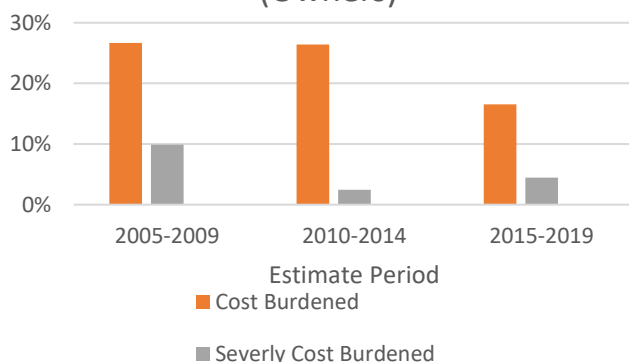


Figure 19. Percent Cost Burdened House Holds (Owners)
Source: HUD-CHAS Data (Table 8)

(Renters)

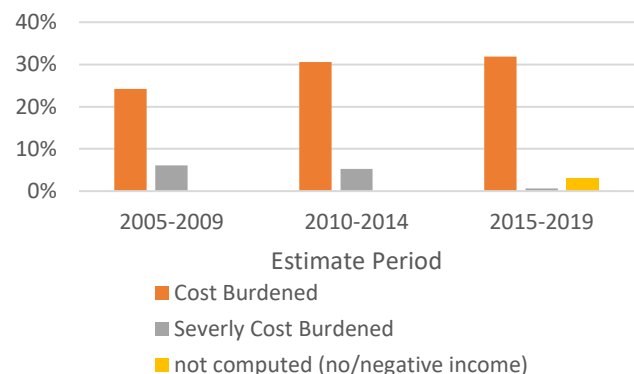


Figure 18. Percent Cost Burdened House Holds (Renters)
Source: HUD-CHAS Data (Table 8)

increased rate accounts for an additional 111 households in this bracket experiencing cost burden for a total of 160 households in the 2015-2019 HUD-CHAS data. This income bracket represents a small portion of Snoqualmie's population, but they are being increasingly cost burdened at a rate that outpaces their growth within the community. This economic hardship indicates a lack of housing that is affordable (will not result in cost burden) to households in this income bracket.

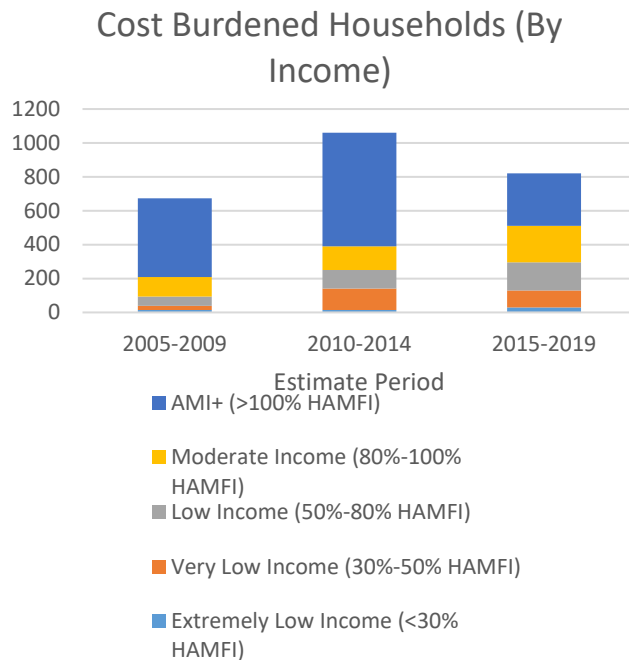


Figure 22. Cost Burdened Households (By Income)
Source: HUD-CHAS Data (Table 8)

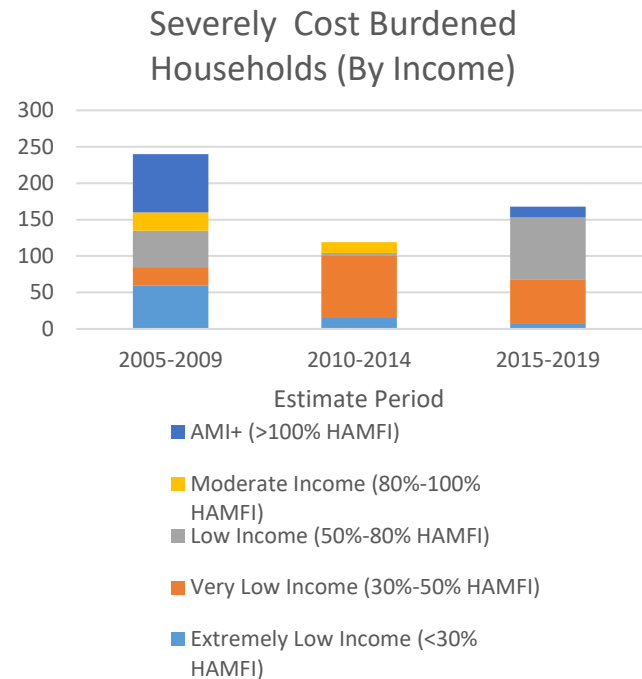


Figure 21. Severely Cost Burdened Households (By Income)
Source: HUD-CHAS Data (Table 8)

While the overall rates of cost burden among Snoqualmie households decreased between 2005 and 2019, they have been trending upwards among low-income and renting households. Specifically, low and very low income households experienced high levels of housing cost in the period of analysis. Approximately 250 cost burdened households were added to each of these income brackets; in the 2015-2019 HUD-CHAS data, 76 percent of low income households and 86 percent of very low income households were cost burdened. These households are relatively income constrained and most of them are experiencing standard-to-severe levels of cost burden. This results in increased displacement risk for these households. Displaced renter households may be able to stay in Snoqualmie in cheaper housing if it is available, but they may face similar levels of displacement risk.

Findings

- The rate of housing cost burden overall in Snoqualmie is decreasing, likely due to the decrease in housing cost burden for homeowners.

- Rates of housing cost burden are increasing for renters signifying that those who cannot afford to buy a home in Snoqualmie may be facing a greater risk of displacement.
- The rate of housing cost burden has increased for owners and renters in the Very Low Income (30-50 percent HAMFI income) bracket which may indicate a lack of housing affordable to households in this income bracket.

c) Affordability of Rental Housing

HUD publishes affordability indexes for rented and owned housing units that can be used to evaluate availability and utilization of affordable housing.

How this indicator relates to displacement

This indicator relates to indirect/economic displacement. The insufficient supply of rental units that are both affordable and available to low-income households forces many households to rent units that are not affordable to them. The associated financial pressure can ultimately force these households out of Snoqualmie. This indicator also signals a risk of exclusionary neighborhood change, as shortages in affordable and available units make it difficult for low-income households to move to the city.

Analysis

In recent years, the amount renter-occupied housing units in Snoqualmie have fluctuated, but have experienced no net growth, at the same time, owner-occupied housing units have been steadily increasing. This does not directly relate to rental unit affordability, but it does imply a reduction in the available supply of rental housing within Snoqualmie. Renting households are more susceptible to displacement pressures, and the reduced supply of rental housing will likely lead to

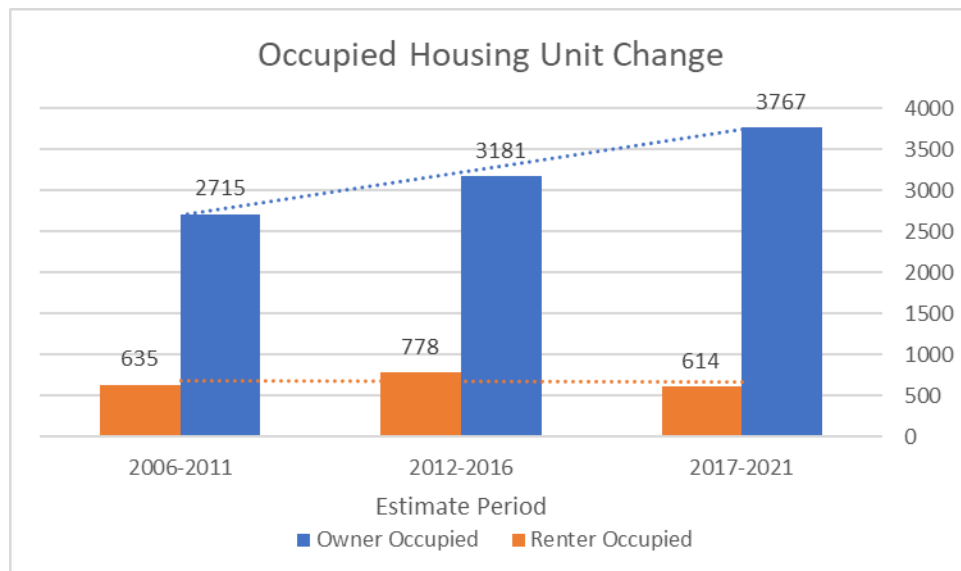


Figure 23. Snoqualmie Housing Unit Change (By Tenure)

Source: U.S. Census Bureau; American Community Survey 5-Year Estimates, Table DP04

increased rent cost and increased levels of cost burden for low-income households.

Affordable options for renters in Snoqualmie have decreased since 2005, with fewer rental units available to all income levels, particularly for household incomes greater than 80 percent HAMFI and between 30 and 50 percent HAMFI. This has likely contributed to increased rates of housing cost burden in renting households and contributes to neighborhood exclusion towards prospective new residents. For example, households in the 30-50 percent HAMFI bracket will likely have to seek rental housing that costs more than 30 percent of their income and would then become cost burdened.

HUD provides data on the household income within affordable housing units. HUD provides data on households rent expenses that shows both household income in HUD income brackets, and the minimum income bracket level that their rent is “affordable” to; affordable in this sense means housing expenses not resulting in cost burden. Even if units are priced to be affordable to lower- or higher-income brackets, some households will be found living in housing that either is greater than their affordability limit (cost burdened) or less than their affordability limit (extremely affordable).

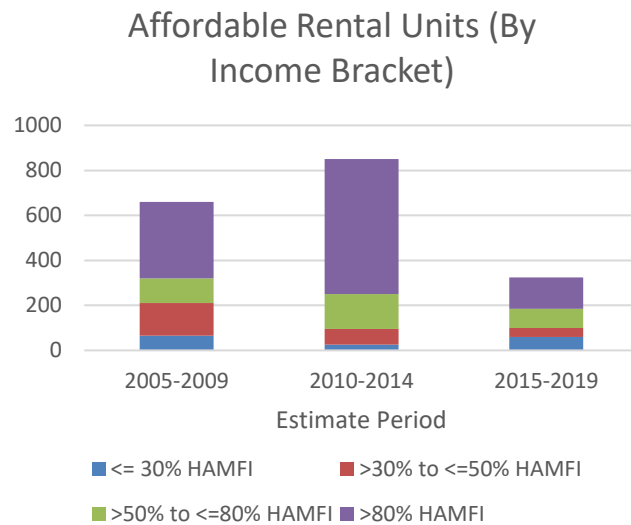


Figure 24. Affordable Rental Units (By Income Bracket)
Source: HUD-CHAS Data (Table 15C)

According to HUD, from 2015 to 2019, households making 30 percent of HAMFI or less represented 8 percent of all renter households in Snoqualmie, and households making 30-50 percent HAMFI were 11 percent of renters. Since 2005, renting households in the 30-50 percent HAMFI income bracket have transferred from living in housing affordable to HAMFI 30-80 percent to living primarily in housing affordable to HAMFI <30 percent. This change in housing affordability for the 30-50 percent HAMFI households indicates possible displacement for households with incomes <30 percent HAMFI, as there is housing affordable to this bracket, but it is not available for their utilization because it is being occupied by households in the next income bracket.

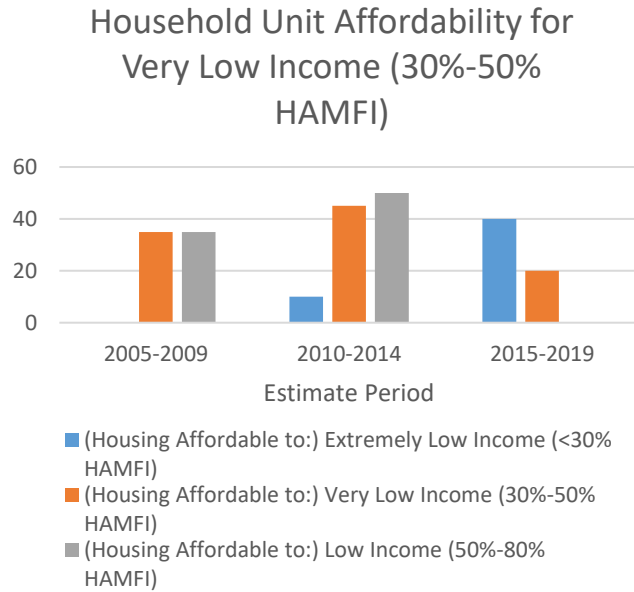


Figure 25. Household Unit Affordability for
Source: HUD-CHAS Data (Table 15C)

Findings

- The housing supply available for rent has changed little while owner housing has grown significantly.
- Availability of rental housing affordable to households with incomes 30-50 percent of HAMFI is decreasing at a greater rate than overall renter housing.
- Households with incomes <30 percent HAMFI may have been displaced by households with income 30-50 percent HAMFI due to lack of rental housing availability.

4. Evaluate displacement risk of individuals from racial, ethnic, and religious communities which have been subject to discriminatory housing policies in the past.

As part of the racial equity and anti-displacement report, the City of Snoqualmie identified the displacement risk of communities of individuals which have been subject to discriminatory housing policies in the past. This will focus on individuals from racial, ethnic, and religious communities. Some displacement risk indicators that were utilized in this analysis were:

- a) Rentership
- b) Educational Attainment
- a) Rentership

One of the ways displacement risk can be measured is by the percentage of renter households occupied by BIPOC⁵ over the percentage of non-BIPOC. Using CHAS data based on 2015-2019 ACS 5-year estimates we found that communities of individuals which have been subject to discriminatory housing policies in the past rent at a higher rate than white non-Hispanic people. This was true for Hispanic people of any race. Non-Hispanic people identifying as multiple races rented at a higher rate than non-Hispanic white people by the largest margin. See figure 26 below for a full summary of rentership vs ownership.

Analysis

The overall percentage of renter-occupied and owner-occupied households in the City of Snoqualmie is 15 percent renters and 85 percent owners.

Figure 20 (next page) shows that from 2015 to 2019, 32 percent of Hispanic households of any race (40 total households) and 64 percent of non-Hispanic households identifying as multiple races (105 total households) rent their units. These figures are above the average rate of renter households in the City of Snoqualmie, which means that there is a higher risk of displacement for these communities that have been subject to discriminatory housing policies in the past.

According to US Census Bureau, there are currently 575 households that identify as black, Asian, and/or Hispanic in the city. 195 of these households are renter-occupied, about 34 percent of the total households.

For the 20 households that are Black or African American alone, non-Hispanic, homeownership is at 100 percent.

For non-Hispanic Asian households, rentership in Snoqualmie is at 11 percent. This figure is below the average rate of renter households in the city.

It is important to note that this census data lists no households identifying as American Indian, Alaska Native non-Hispanic or Pacific Islander non-Hispanic. However, this does not necessarily mean that there are no households of American Indian, Alaska Native non-Hispanic or Pacific Islander non-Hispanic

⁵ Black, Indigenous, and People of Color

descent in the City of Snoqualmie. Instead, their data may be captured elsewhere within the Census dataset; for example, within Hispanic households of any race or non-Hispanic households identifying as multiple races.

With the City of Snoqualmie being located on the ancestral lands of the Snoqualmie Tribe, understanding rentership data for Indigenous peoples in the area is an important aspect to displacement risk for this community. Snoqualmie Tribal membership⁶ is spread out through the region between the cities of Snoqualmie, North Bend, Fall City, Carnation, Issaquah, Mercer Island, and Monroe and is estimated around 650 Tribal members⁷. To better understand rentership data for Indigenous households in the City of Snoqualmie, further data is needed to determine their displacement risk.

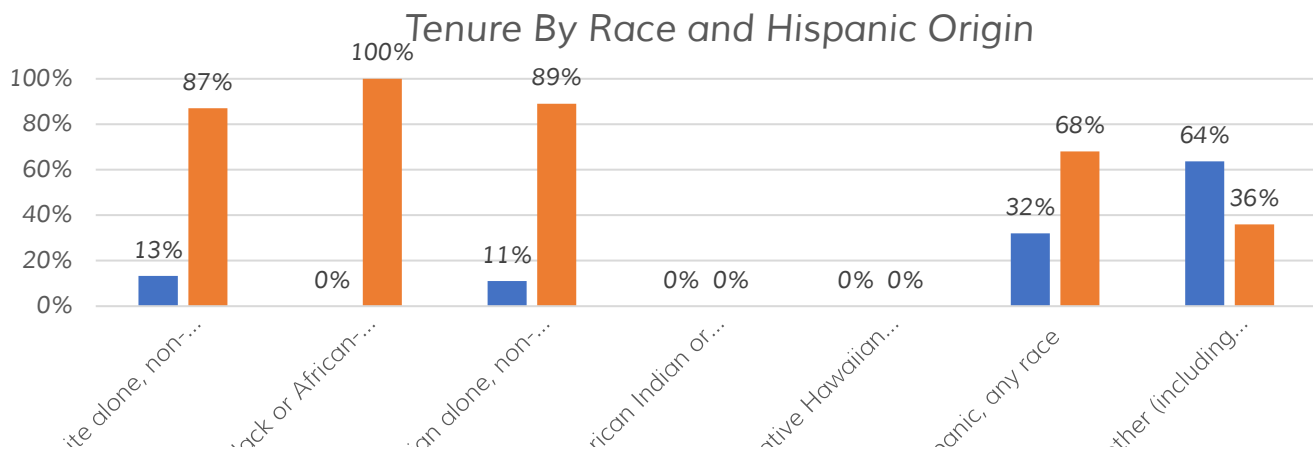


Figure 26. Tenure By Race and Hispanic Origin

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates Table S2502

b) Educational Attainment

Analysis

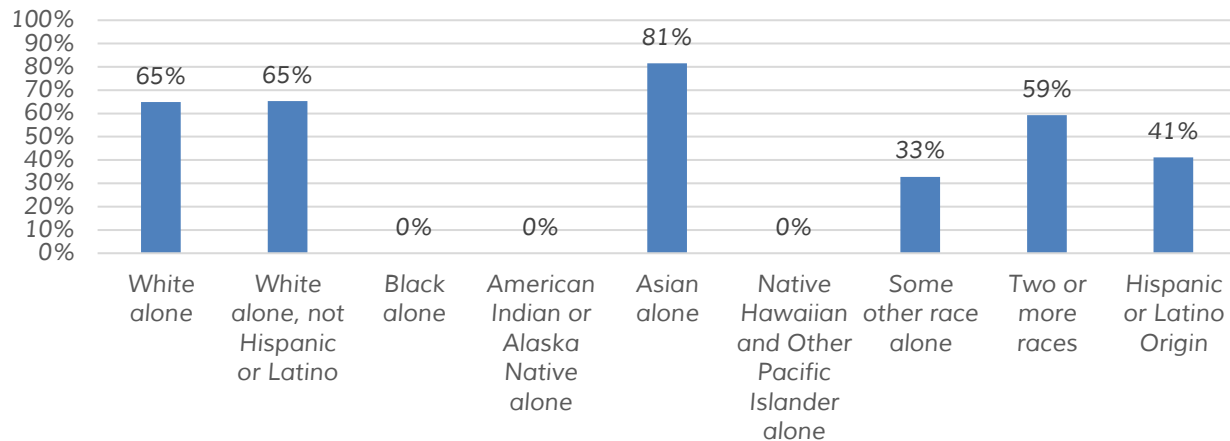
An additional method that acts as a proxy for measuring displacement risk is educational attainment; that is the percent of individuals with college bachelor's degree within specific communities in comparison to the City's average. A lower percentage of college degrees for individuals of a community can mean that they are more likely to be priced out of their homes, neighborhoods, and even the city. This is because in the region and city, individuals with a college degree (bachelor's+) make higher incomes on average than those without a college degree (see Figure 22 and 23 below). The City of Snoqualmie has a population of 8,913 over the age of 25 and 66 percent (5,898) have bachelor's degrees or higher education attainment. This analysis found that 0 percent Black, American Indian or Alaska Native, Native Hawaiian and other Pacific Islander, 32.8 percent other race alone, 59.2 percent two or more races, and 41.2 percent of Hispanic or

⁶ Snoqualmie Tribal membership is based on a 1/8th blood quantum (Snoqualmie Indian Tribal Constitution Article 2, Section 1).

⁷ Source: [Northwest Portland Area Indian Health Board](#)

Latino origin over the age of 25 in Snoqualmie have a bachelor's degree or higher in the city. See table below for total numbers.

Educational Attainment for ages 25 and older (Holders of Bachelors Degrees)



Age 25+ Origin by Educational Attainment	Total Population	Not high school graduate	High school graduate or higher	Bachelor's degree or higher	Percent bachelor's over total
White alone	7439	68	7371	4831	64.9%
White alone, not Hispanic or Latino	7278	68	7210	4749	65.3%
Black alone	44	0	44	0	0%
American Indian or Alaska Native alone	7	7	0	0	0%
Asian alone	1080	26	1054	880	81.5%
Native Hawaiian and Other Pacific Islander alone	0	0	0	0	0%
Some other race alone	61	15	46	20	32.8%
Two or more races	282	2	280	167	59.2%
Hispanic or Latino Origin	277	17	260	114	41.2%
City Totals (25+)	8913	118	8795	5898	66.2%

Figure 27. Educational Attainment for ages 25 and older

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates Table S1501

Findings

- Results show that individuals 25 or older of communities that have experienced discriminatory housing practices in the past have a lower percentage of bachelor's degrees than the overall average in the city. This suggests that these populations may face a higher risk of displacement. Data show that residents of Black alone, American Indian or Alaska Native alone, some other race alone, Hispanic or Latino origin and those of two or more races may be more at risk of displacement based on their educational attainment.
- Displacement risk of individuals from religious communities that have been subject to discriminatory housing policies in the past is difficult to measure for the City of Snoqualmie. Current and historical land use policies in the city do not inhibit religious uses in any abnormal ways.

5. Evaluate displacement risk of locally owned businesses

Displacement of locally owned businesses can occur from physical (direct) or economic (indirect) displacement forces in a community.

a) Re-development Potential

King County created the Urban Growth Capacity Report (Buildable Lands) in 2021 for all parcels in the county. This report evaluates parcels based on a number of physical and regulatory factors to scope where additional capacity for residential housing could be feasibly placed within the county. Classifications of interest are re-developable land and vacant land.

How this indicator relates to displacement

Displacement risk is often seen where commercial or industrial land is re-developed as residential to accommodate population growth within the city limits. If there is insufficient vacant commercial land, re-development will likely lead to businesses being displaced from the area all together.

Snoqualmie has limited risk of displacement as described above. The PSRC displacement risk mapping tool shows that all of Snoqualmie is considered at low risk of displacement of all types.

More specifically, the Buildable Lands data from King County (2021 Urban Growth Capacity Report) show that Snoqualmie has the following amounts of nonresidential square footage on redevelopable land by zone and assumed jobs:

Zone	Existing Nonresidential Square Footage on Redevelopable Parcels	Estimated Jobs
Business General	3,372	7
Business Office	0	0
Business Retail 1	241	1

Business Retail 2	0	0
Office Park	0	0
Planned Commercial/Industrial	7,780	16
Resource Extraction	0	0
SRI Commercial – Retail	0	0
SRI Commercial – Office Park	0	0
FBMU Commercial	0	0

Source: Snoqualmie Phase 4 Excel data submitted to King County for 2021 Urban Growth Capacity Report data collection.

This indicates that roughly 24 jobs are at risk of market-related displacement.

The updated land capacity analysis produced as part of this Middle Housing program revealed no additional developed commercial or industrial uses that met the definition of redevelopable land as defined in the Urban Growth Capacity Report. However, part of this recommendation process may include policy and code recommendations to encourage construction of 2nd floor commercial or residential uses above parking that is currently associated with neighboring businesses to mitigate displacement risk and assist with housing capacity.

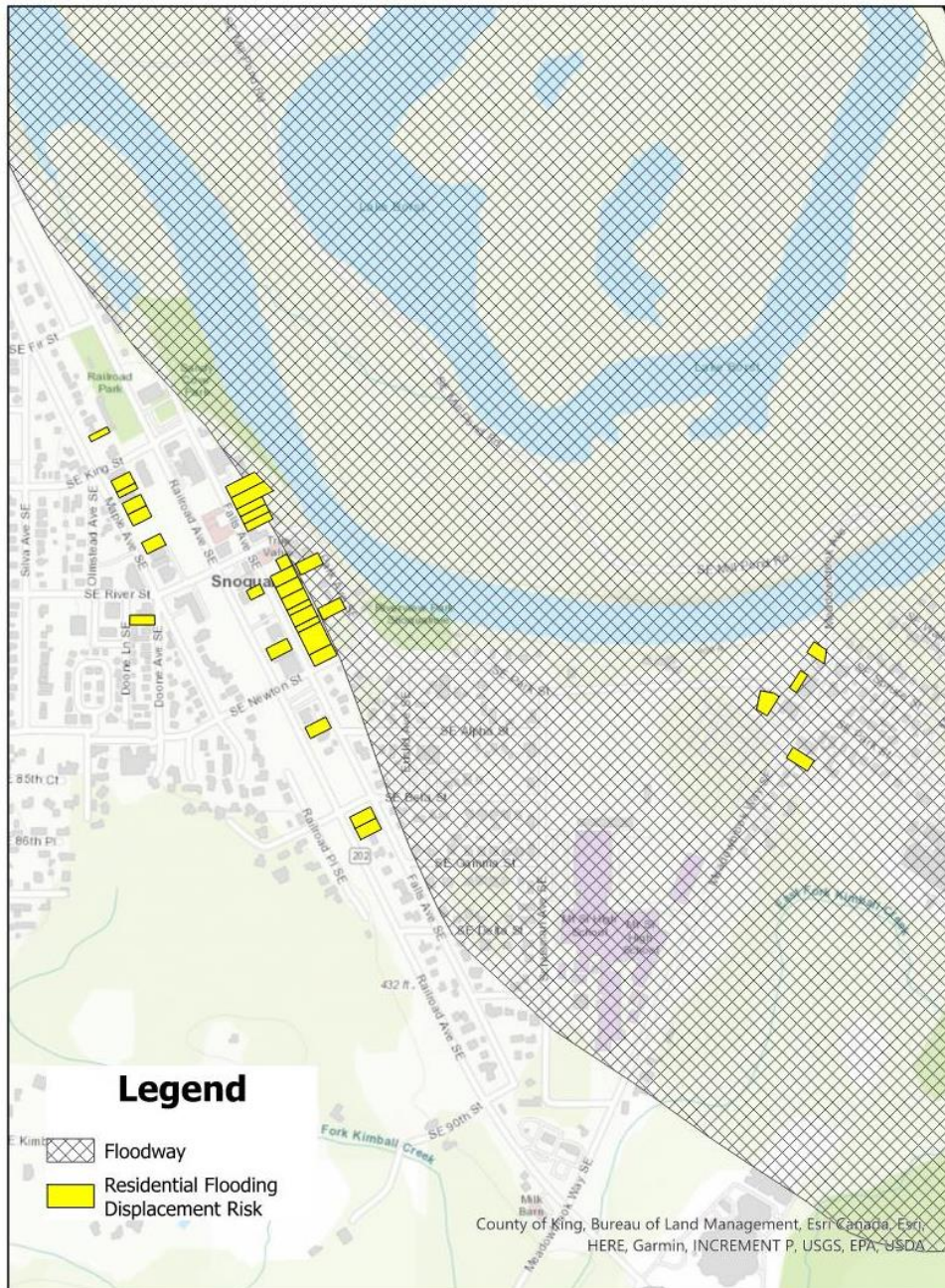
It is important to note that while Snoqualmie has little business displacement risk from redevelopment, there are many nonresidential uses in the floodplain of the Snoqualmie River that are risk of displacement due to flooding. The map below shows parcels with employment uses located within the floodplain of the river. There are 75 parcels with current employment-generating uses (not counting parking associated with other uses and not counting the Mill site) in the floodplain, and 14 located within the floodway. These sites would be most vulnerable to geographic displacement. In applying the employees per square footage assumptions of the Urban Growth Capacity Report, the following jobs per zone might be at risk of displacement due to flooding. This represents a total of 1,249 jobs (including schools).

Zone	Number	Sum of Square Footage	Square Footage per Employee	Employees
BG	16	50345	450	111.8778
BO	0	0	300	0
BR1	18	69187	400	172.9675
BR2	11	52796	400	131.99
FBMU	10	27387	375	73.032
PCI	2	33200	490	67.7551
RC	12	526559	800	658.1988
Other (OS2/OS3)	6	26518	800	33.1475
Total	75			1249

Note: RC and OS employment density taken from Resource Extraction because it was not estimated in UGCR

6. Evaluate other residential displacement risk

As with employment, residences within the floodplain and especially the floodway are at risk of displacement. The Land Capacity Analysis conducted as part of this Middle Housing program resulted in the identification of 33 parcels with single-family or middle housing uses located in non-residential zones in the floodplain. These 33 parcels contain 51 dwelling units that would be at risk of displacement should a flood occur, because first-floor residential as a primary use is nonconforming to the zoning code. Those parcels are shown in the map below.



VI. Report Findings

The following items in italics come directly from the new Housing Element requirements listed in RCW 36.70A.070(e-h) and are outlined in the Department of Commerce grant program requirements. Responses from this analysis are outlined below each requirement.

- 1) Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including: zoning that may have a discriminatory effect; disinvestment; and infrastructure availability.
 - a) The City of Snoqualmie has generally strong housing policies that provide support for housing identified in the Growth Management Act (GMA) including:
 - i) Providing a variety of housing types at different affordability levels
 - ii) Incentivizing affordable housing
 - iii) Providing more options for first time home buyers
 - iv) Support for Housing types, such as ADUs
 - v) Providing for housing diversity
 - vi) Promoting retention of older housing stock
 - vii) Providing housing to meet market demand
 - b) The City will need to update housing policies as part of the 2024 Comprehensive Plan update to provide a greater focus on new language added to Housing Element requirements (RCW 36.70A.070(f) and (h)). This includes policies to address racially disparate impacts, displacement, and exclusion in housing. In many cases, this only requires updating existing policies. Policy suggestions will be provided as part of a follow-up report.
 - c) There are a few policies identified where changes should be considered to provide more inclusive language. Suggestions for policy change will be provided as part of the follow-up report.
- 2) Identify areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations.

Based upon PSRC mapping, the residents of the City of Snoqualmie are at low risk for significant displacement. Proactive policies can be developed to get ahead of these issues and to be ready when displacement occurs. Without necessarily mentioning displacement, the City already has policies that are proactive in this way, such as promoting the retention of housing that is affordable and housing assistance for people living in the floodplain.

- a) Snoqualmie will need to make changes to its comprehensive plan and additions to its zoning regulations to accommodate projected growth but is constrained from causing much displacement in doing so, since the eastern half of the city is in the floodplain and has limited redevelopment potential, and the western half of the city is almost entirely within a master-planned community, much of which is quite

new. Policy options which could limit redevelopment displacement risks will be explored as part of the follow-up report.

- b) There are a few small, and two larger, properties with capacity where the City is contemplating pursuing strong housing affordability. One of these is city-owned. This could likely help offset any limited displacement that may result from changes to zoning development regulations.
 - c) Some business displacement may result from some of the potential land use changes. The City should consider economic development policies in its comprehensive plan update to assist businesses with displacement, since this also affects the workforce and thus middle housing issues.
- 3) Evaluate displacement risk of very low, low, and moderate income households.
- a) Renting households have significantly lower incomes than owning households.
 - b) The number of renting households that make less than 30 percent of the HAMFI has increased substantially over the last 13 years. This indicates increasing levels of economic displacement pressure.
 - c) The rate of housing cost burden overall in Snoqualmie is decreasing, likely due to the decrease in housing cost burden for homeowners.
 - d) Rates of housing cost burden are increasing for renters signifying that those who cannot afford to buy a home in Snoqualmie may be facing a greater risk of displacement.
 - e) The rate of housing cost burden has increased for owners and renters in the Very Low Income (30-50 percent HAMFI income) bracket which may indicate a lack of housing affordable to households in this income bracket.
 - f) The housing supply available for rent has changed little while owner housing has grown significantly.
 - g) Availability of rental housing affordable to households with incomes 30-50 percent of HAMFI is decreasing at a greater rate than overall renter housing.
 - h) Households with incomes <30 percent HAMFI may have been displaced by households with income 30-50 percent HAMFI due to lack of rental housing availability.
- 4) Evaluate displacement risk of individuals from racial, ethnic, and religious communities which have been subject to discriminatory housing policies in the past.
- a) Results show that individuals 25 or older of communities that have experienced discriminatory housing practices in the past have a lower percentage of bachelor's degrees than the overall average in the city. This suggests that these populations may face a higher risk of displacement. Data show that residents of Black alone, American Indian or Alaska Native alone, some other race alone, Hispanic or Latino origin and those of two or more races may be more at risk of displacement based on their educational attainment.
 - b) Displacement risk of individuals from religious communities that have been subject to discriminatory housing policies in the past is difficult to measure for the City of

Snoqualmie. Current and historical land use policies in the city do not inhibit religious uses in any abnormal ways.

- 5) Evaluate displacement risk of locally owned businesses.
 - a) Snoqualmie has limited displacement risk as outlined in Commerce guidance and PSRC displacement risk mapping.
 - b) Data prepared for the King County Urban Growth Capacity Report identified roughly 24 jobs' worth of commercial and industrial land that was redevelopable.
 - c) Additional analysis did not reveal any additional businesses at risk of displacement.
 - d) Roughly 1,249 jobs (including at three schools) are potentially at risk of displacement due to flooding.
- 6) Evaluate other residential displacement risk.
 - a) Roughly 51 housing units on 33 parcels are nonconforming ground-level primary uses in the floodplain and are thus potentially at risk of displacement due to flooding.