

Appendix 6-B

Racially Disparate Impacts (RDI)
Analysis

Racial Equity Analysis Report

BACKGROUND

The City of Monroe is undertaking a periodic update to the 2015-2035 Monroe Comprehensive Plan. The Comprehensive Plan is a document that guides the City of Monroe’s decisions on local policy, planning, and capital facility investment over a 20-year period. The Plan acts as a blueprint for growth and development in the City; it will impact neighborhoods, businesses, traffic, public facilities and services, the environment, and residents. The Plan is also meant to reflect the vision and priorities of Monroe communities and residents, while meeting requirements of local, county, regional, state and federal law.

Several new state laws that passed since the last periodic Comprehensive Plan update in 2015 will affect the content and focus of the current update effort, including WA State House Bill 1220, passed in 2021. This bill amended the Washington State Growth Management Act (GMA), requiring local governments to plan for and accommodate housing affordable to all income levels. Recent changes also require jurisdictions to examine racially disparate impacts, displacement, exclusion, and displacement risk in housing policies and regulations and ultimately adopt policies to begin to undo the impacts.

Land use and other related policies directly affect a community’s housing conditions as they impact the development and location of jobs, recreational areas, educational facilities, infrastructure, medical facilities, and other needed services. Land use requirements and decisions also shape the cost of housing developments by defining the types and sizes of homes that are allowed to be built. These constraints affect the affordability and accessibility of housing for different households, and more specifically, determine if and where households can live within a community, based on their income.

This report examines current housing patterns to assess racially disparate impacts, displacement, and exclusion in Monroe, evaluates existing housing policies, and includes a range of housing policies for the City to consider in the updated Comprehensive Plan.

Key Components of the Report

This report, developed as part of the overall planning process for the Monroe 2044 Comprehensive Plan update and based on the Washington State Department of Commerce’s Racially Disparate Impacts Guidance, includes the following sections:

1. **Background** provides an overview of the document, describes the purpose, and reviews the regulatory requirements.
2. **Community Information** provides an overview of the Monroe community and key population, demographic, and land use information.
3. **Impact Assessment** uses available data to look at current housing patterns and assess whether there are racially disparate impacts, displacement, and exclusion in Monroe’s housing.

4. **Housing Policy Evaluation** evaluates the City’s housing policies to determine whether they support GMA goals for housing and adequately address racially disparate impacts, displacement, and exclusion in housing.
5. **Housing Policy Recommendations** describes a variety of policies that should be considered in the City’s Comprehensive Plan Housing Element.

Definitions

The State of Washington defines the following commonly used terms:¹

Racially disparate impacts occur when policies, practices, rules, or other systems result in a disproportionate impact on one or more racial groups. Racial disparities exist when policies disproportionately confer benefits to one group and burdens to another.

Displacement refers to instances where a household is forced or pressured to move from their home by factors outside of their control. There are three main types of displacement:

- **Economic displacement:** Displacement due to inability to afford rising rents or costs of homeownership like property taxes.
- **Physical displacement:** Displacement as a result of eviction, acquisition, rehabilitation or demolition of property, or the expiration of covenants on rent-or income-restricted housing.
- **Cultural displacement:** Residents are compelled to move because the people and institutions that make up their cultural community have left the area.

Displacement risk refers to the likelihood that a household, business, or organization will be displaced from its community.

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

Regulatory Requirements

The Washington State GMA requires cities and counties to develop a local Housing Element (RCW 36.70A.070(2)). The Housing Element provides goals and policies for promoting the preservation, improvement, and development of housing and the identification of adequate land for all housing needs. The Housing Element must include adequate provisions for existing and projected housing needs of all the economic segments of the community and these needs should be identified through an inventory and analysis of existing and projected housing needs. Based on the analysis, strategies should be developed to meet the housing needs and their performance should be measured to allow for continual adjustment to meet housing needs and goals.

House Bill 1220 significantly strengthened the GMA housing goal, changing a requirement to encourage affordable housing to “plan for and accommodate housing affordable to all income levels.” This requires local jurisdictions to take an active role in not only shaping housing policy but ensuring that housing plans reflect existing and projected housing needs of all economic segments of the community.

¹ *Racially Disparate Impacts Guidance* (2023). Washington State Department of Commerce. Available: <https://www.commerce.wa.gov/uncategorized/final-guidance-to-address-racially-disparate-impacts-in-comprehensive-plans/>.

In addition, each fully planning jurisdiction must now do the following as outlined in RCW 36.70A.070(e-h)

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

Disclaimer

The information in this report provides a perspective on the relationship between housing and racial equity. While addressing housing disparities through local policies and regulations can be a potential approach to improving racial equity, it is crucial to understand that it is a complex social issue that requires a multi-faceted approach to address effectively. Addressing housing issues through regulations alone cannot comprehensively solve the disparities and systemic challenges related to racial equity. It should be considered one aspect within a broader strategy aimed at improving conditions.

COMMUNITY INFORMATION

The following information provides an overview of the racial and ethnic makeup of Monroe and other communities of interest.

Population

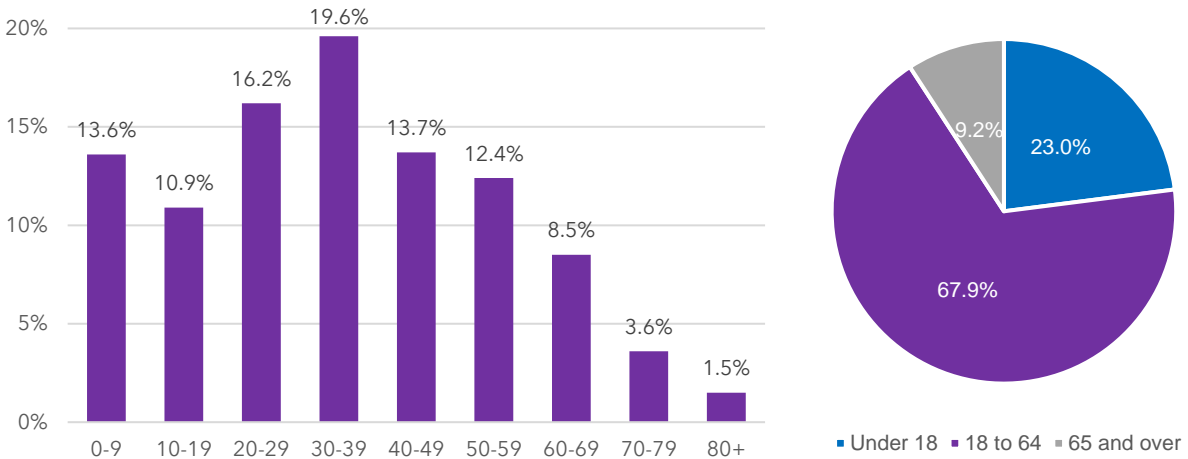
The population size of a city is a fundamental piece of demographic information that provides insights into Monroe's scale and dynamics. The age distribution is also an important factor for understanding social dynamics and can help identify specific needs and challenges with each age group.

Monroe is home to a population of just over 20,000 people with a median age of 33.9.² Just under 10% of the population is under the age of 18. Conversely, almost 25% of the population is comprised of

² This includes the population at the WA State Department of Corrections (DOC) Monroe Correctional Complex. This population varies and is currently just under 1,500 people (2023). Maximum facility capacity is currently 1,779; however, the facility was designed to accommodate a total of 2,400 people.

seniors, those aged 65 and older (see Figure 1). There are 5,498 households with an average size of 2.9 people per household.

Figure 1: Population Distribution by Age



Source: US Census Bureau, 2016-2020 American Community Survey 5-Year Estimates (Table S0101)

Race and Ethnicity

Race and ethnicity play a significant role in understanding Monroe’s diversity and inclusivity. Examining the racial and ethnic composition provides insight into various community groups within Monroe. With proper engagement, the City can tailor services and programs to meet the unique needs of different communities present.

Table 1 provides a summary of racial and ethnic populations within Monroe. The share of minority populations in Monroe and Snohomish County are similar at 28.9% and 27.9%, respectively. There are two key exceptions, however. The Asian population in Monroe is underrepresented (4.5%) compared to the County (11.3%). Conversely, the Hispanic/Latino population is overrepresented (16.4%) compared to the County (10.5%). While each race and ethnicity had different growth trends over time, the percentage of communities of color as a whole have increased in Monroe (Figure 2).

Table 1: Race and Ethnicity, Monroe, Snohomish County, and Washington State (2020)

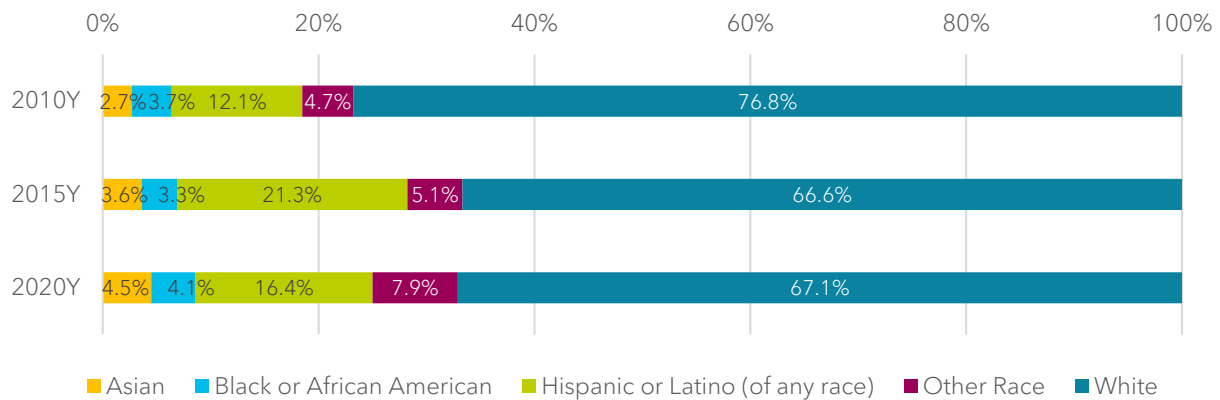
Race or Ethnic Category	Monroe	%	Snohomish County	%	Washington	%
Asian	875	4.5%	91,482	11.3%	656,578	8.7%
Black or African American	799	4.1%	25,918	3.2%	279,720	3.7%
Hispanic or Latino (any race)	3,177	16.4%	85,321	10.5%	971,522	12.9%
Other Race*	1,542	7.9%	56,338	6.9%	536,736	7.2%
White	13,010	67.1%	552,513	68.1%	5,067,909	67.5%
Total	19,403		811,572		7,512,465	

* Other race includes people who self-identify as American Indian or Alaska Native, Native Hawaiian and Other Pacific Islander, another race (Other), and two or more races and are not Hispanic or Latino

* American Community Survey sample includes both institutional and non-institutional group quarters

Source: US Census Bureau, 2016-2020 American Community Survey 5-Year Estimates (Table DP05)

Figure 2: Racial Composition Trend in Monroe, 2010-2020



Source: US Census Bureau, 2010, 2015, 2020 American Community Survey 5-Year Estimates (Table DP05)

Household Income

Household income and poverty rates provide essential insights into the socioeconomic well-being of Monroe’s residents. Examining income distribution and poverty levels can help identify economic disparities and areas of need and groups that may be disproportionately affected by economic hardships.

Table 2 provides a summary of income characteristics in Monroe and Washington. In 2020, the median household income in Monroe was \$88,683, about 20% higher than the overall population in Washington at \$77,006. Per capita income was \$29,664, about three-quarters of the amount in Washington (\$40,837). It is important to note that if group quarters populations are removed, per capita incomes among households increases in Monroe to \$33,607, which is still significantly lower than the County and State. The higher median household income in the City compared to the state average indicates that there are relatively more households with higher incomes. However, the lower per capita income suggests that a significant portion of the population has lower individual incomes, which may contribute to income inequality within the City.

Table 2: Income, Monroe, 2020

Income	Monroe	Snohomish County	Washington
Per Capita Income	\$29,664	\$41,126	\$40,837
Median Household Income	\$88,683	\$89,273	\$77,006

Source: US Census 2016-2020 American Community Survey 5-Year Estimates (Table S1901, B19301)

Note: Monroe’s per capita income in Table 6.3 includes the total population, including groups quarters. The per capita household population, which does not include group quarters, is higher at \$33,607.

Education

Analyzing educational data allows for the identification of disparities and inequities in access to quality education. Table 3 provides a summary of educational attainment in Monroe and Washington. As shown, approximately 20% of the population in Monroe have a bachelor’s degree or post-graduate degree. This is lower compared to the state at approximately 35%. The proportion of the population without a degree in Monroe is comparable to that of Washington, at approximately 10% and 8%, respectively. The lower percentage of individuals with a college degree indicates that there may be disparities in access to higher education within Monroe. Factors such as limited educational resources, lower college enrollment rates, or socioeconomic barriers can contribute to this disparity.

Table 3: Education Attainment, Monroe (2020)

Education	Monroe		Snohomish County		Washington	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
No Degree	1,280	9.6%	42,201	7.5%	431,403	8.3%
High School	3,500	26.3%	133,655	23.6%	1,133,689	21.8%
Some College	5,757	43.3%	204,574	36.1%	1,727,441	33.2%
Bachelor’s Degree	2,207	15.3%	125,052	22.1%	1,183,949	22.8%
Post-Graduate	724	5.5%	60,294	10.7%	723,289	13.9%
Total	13,288		565,776		5,199,771	

Source: US Census 2016-2020 American Community Survey 5-Year Estimates (Table S1501)

IMPACT ASSESSMENT

This section of the report provides an assessment of current housing conditions using multiple data sources and approaches. The assessment provides valuable information on the nature and degree of impacts, as well as factors contributing to disparities and areas at a higher risk of displacement. By understanding these impacts, community members and policymakers can develop strategies to address racial equity issues in housing.

It is important to acknowledge the limitations posed by data availability when interpreting and drawing conclusions from this assessment. This assessment notes where these limitations exist and where additional research or data collection may be necessary.

Racially Disparate Impacts

Homeownership

Homeownership is an important pathway to wealth building and economic stability. It can lead to intergenerational wealth transfer, improved access to credit, and greater stability in housing expenses.

Homeownership can also have positive impacts on neighborhood and community development as homeowners have a vested interest in the maintenance and improvement of their properties, which contributes to the overall stability and desirability of the neighborhood.

Understanding the disparities of how homeownership rates vary among different racial and ethnic groups can provide insight to the challenges and opportunities faced by each group. Table 4 provides a summary of homeownership among racial/ethnic groups within Monroe. As shown in the table, homeownership rates among most minority groups in Monroe are similar to or exceed the average homeownership rates for Snohomish County. The one exception being among American Indian or Alaska Native households, which are more likely to rent than own. Similarly, homeownership rates among the white population are similar, albeit slightly lower than the average for the county. The higher homeownership rates among minority groups in Monroe may reflect unique characteristics of the local housing market. Factors such as lower housing costs, favorable lending practices, availability of affordable housing units, or cultural preferences for homeownership may contribute to this difference from the county average.

Table 4: Monroe Share of Owner and Renter Households by Racial/Ethnic Group, 2019

Race & Ethnicity	Monroe				Snohomish County		Washington State	
	Own	Rent	Own	Rent	Own	Rent	Own	Rent
American Indian or Alaska Native	4	15	21%	79%	57%	43%	54%	46%
Asian	150	35	81%	19%	72%	28%	62%	38%
Black or African American	45	15	75%	25%	40%	60%	32%	68%
Hispanic or Latino (of any race)	335	445	43%	57%	44%	56%	44%	56%
Other Race	155	80	66%	34%	55%	45%	47%	53%
Pacific Islander	0	0	0%	0%	38%	63%	32%	68%
White	2,710	1,285	68%	32%	70%	30%	68%	32%

Source: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 9)

Housing Cost Burdens

Housing costs in Washington, particularly in major urban areas, have been rising faster than median household incomes. High housing costs relative to income can result in households making trade-offs in other essential areas such as healthcare, education, or future savings. Rising housing costs can also contribute to displacement and gentrification. As housing prices increase, long-term residents, including minority communities, may face challenges in maintaining their housing and may be forced to move to more affordable areas. High housing costs relative to household incomes can also have an impact on the workforce and economy. When housing costs are high relative to income, it becomes challenging for employers to attract and retain employees.

Housing cost burden refers to the proportion of income that households spend on housing expenses, including rent or mortgage payments, utilities, and other related costs. Housing cost burdens is defined as when a household spends more than 30% of their income on housing costs. Minority communities may face affordability challenges due to lower incomes and limited access to affordable housing options.

High housing cost burdens can result in financial stress, limited disposable income for other necessities, out-migration from the community, and difficulty saving for future expenses or investments. Housing cost burdens can also vary based on location and neighborhood. Some minority communities may face

higher housing costs in areas with limited affordable housing options, fewer amenities, and fewer opportunities for economic advancement.

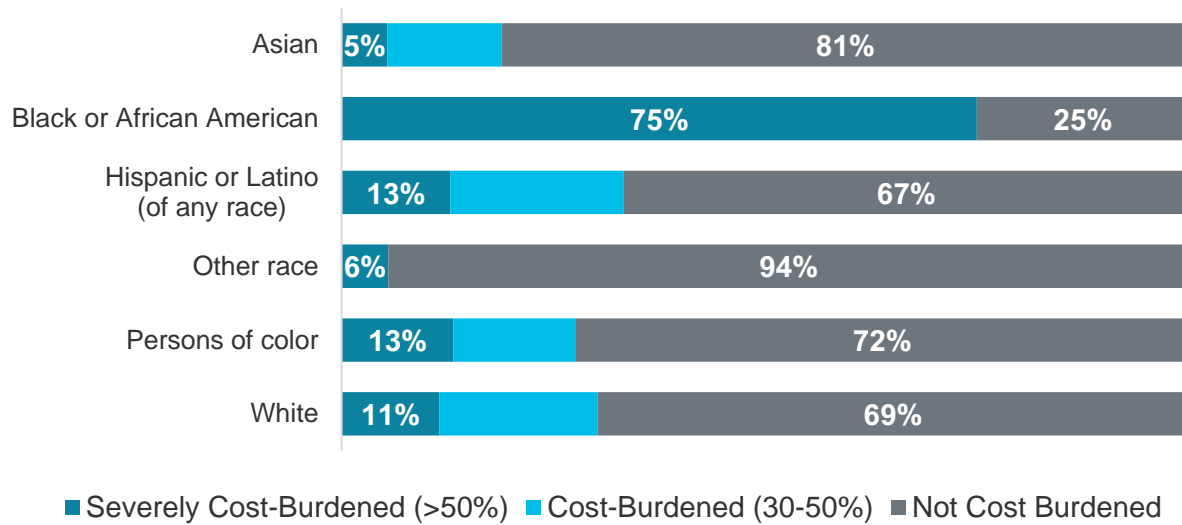
Table 5 and Figure 3 provide summaries of housing cost burdens among racial/ethnic groups within Monroe. As shown in the table and figure, the overall share of cost-burdened households between the white and minority populations is similar at 30% and 28%, respectively. However, within the minority groups, nearly three-quarters of Black or African American residents in Monroe are severely cost-burdened; meaning more than 50% of their household income is spent on housing expenses.

Table 5: Number of Households in Monroe by Housing Cost Burden, 2019

	White	Black or African American	Asian	American Indian or Alaska Native	Pacific Islander	Other Race	Hispanic or Latino (of any race)	Total
Owner Households								
Not Cost Burdened	2,080	15	125	0	0	145	205	2,570
Total Cost-Burdened	620	30	25	4	0	10	130	819
Cost-Burdened (30~50%)	470	0	15	0	0	0	75	560
Severely Cost-Burdened (>50%)	150	30	10	4	0	10	55	259
Not Calculated	10	0	0	0	0	0	0	10
Total	2,710	45	150	4	0	155	335	3,399
Renter Households								
Not Cost Burdened	670	0	25	15	0	80	315	1,105
Total Cost-Burdened	570	15	10	0	0	0	130	725
Cost-Burdened (30~50%)	265	0	10	0	0	0	85	360
Severely Cost-Burdened (>50%)	305	15	0	0	0	0	45	365
Not Calculated	40	0	0	0	0	0	0	40
Total	1,285	15	35	15	0	80	445	1,875
Total Households	3,995	60	185	19	0	235	780	5,274

Source: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 9)

Figure 3: Percentage of Households in Monroe by Housing Cost Burden, 2019



Source: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 9)

Overcrowding

The U.S. Census defines an overcrowded unit as one occupied by 1.01 persons or more per room and units with more than 1.5 persons per room are considered severely overcrowded. Overcrowding is often connected to challenges with housing affordability. As shown in Table 6, approximately 5% of housing units are overcrowded in Monroe. This is higher compared to the county and state both at approximately 3.4%.

Higher housing costs and limited affordable housing options can force low-income individuals and families, including many minority groups, to live in crowded conditions due to financial constraints. Overcrowding in households can have adverse impacts on health and education. Living in crowded spaces increases the risk of communicable disease, stress, and mental health issues. It can also hinder studying and concentration as students may face difficulties completing homework or finding quiet spaces for learning. Overcrowding is often associated with housing instability as families may be forced to share living spaces or move frequently to find affordable options.

Table 6: Overcrowded units in Monroe, 2020

Occupants Per Room	Monroe		Snohomish County		Washington State	
	2011-2015	2016-2020	2011-2015	2016-2020	2011-2015	2016-2020
Occupied Housing Units	4,777	5,498	274,766	298,815	2,668,912	2,905,822
1.00 or less	94.2%	94.7%	97.2%	96.6%	97.0%	96.6%
1.01 to 1.50	3.6%	4.0%	2.1%	2.4%	2.2%	2.2%
1.51 or more	2.3%	1.3%	0.7%	1.0%	0.9%	1.2%

Source: US Census 2016-2020 American Community Survey 5-Year Estimates (CP04 Comparative Housing Characteristics)

Commute

Commuting plays a crucial role in accessing job opportunities. Longer commute times or limited access to transportation can hinder a person’s ability to reach job centers or access a wider range of

employment opportunities. Longer commute times can also reduce the amount of time available for other activities such as childcare, education, and leisure, which can impact work-life balance, career advancement, and overall economic well-being. Minority communities that face income disparities are more likely to seek affordable housing options farther away from employment centers. This can result in longer commutes and increased time spent traveling to and from work.

Additional research and analysis of available data would be necessary to provide insight on commute patterns and its impact on housing for minority groups for Monroe.

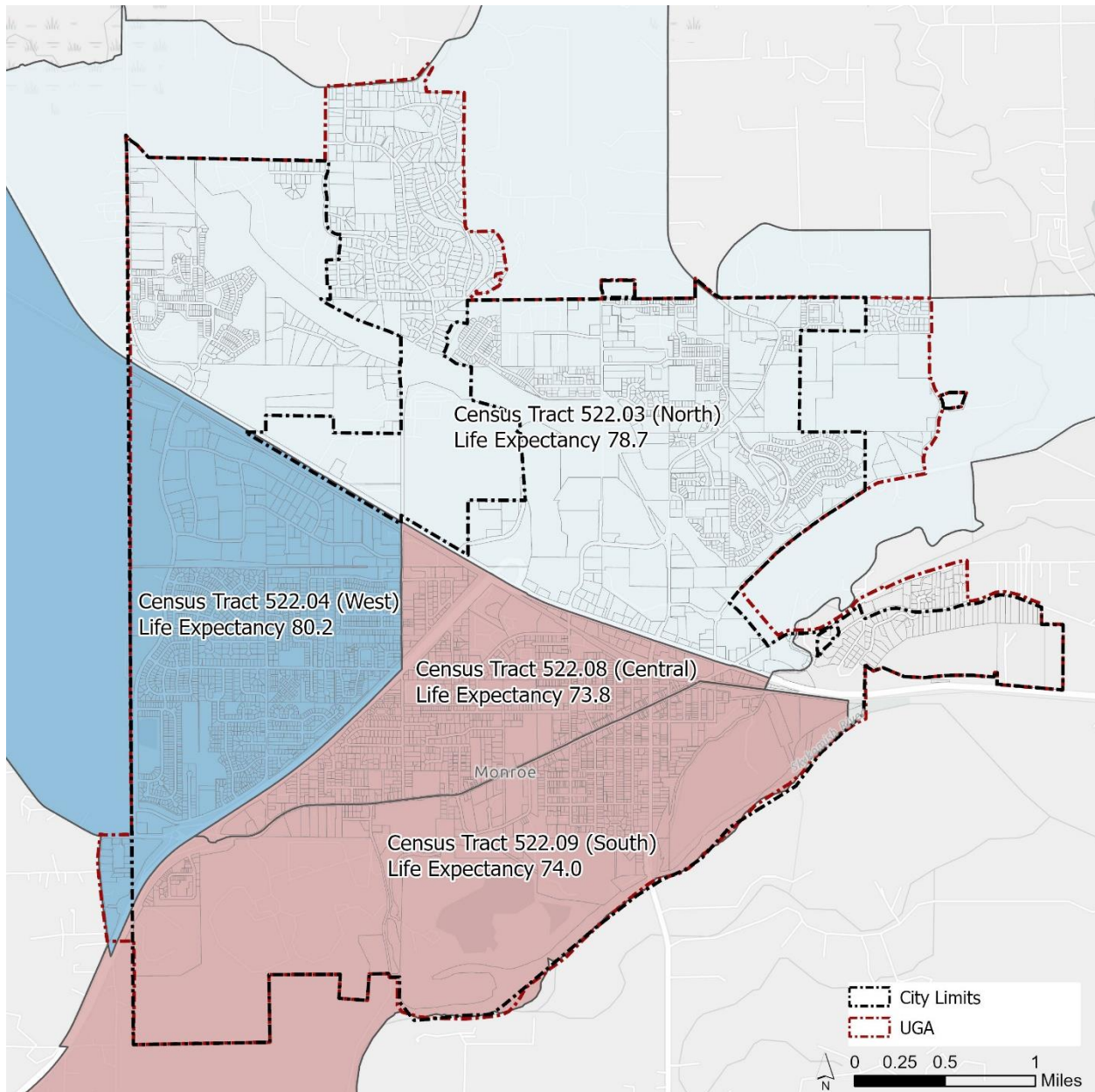
Life Expectancy

Life expectancy refers to the average number of years a person is expected to live. Social determinants of health, such as housing, education, employment, and environmental factors impact life expectancy.

Information on life expectancy is available from the Washington State Health Disparities data at the Census Tract geographic level from 2015 (see Figure 4). According to the information, life expectancy for all residents in the State of Washington is 80.3 years. The life expectancy for people living in Census Tracts within Monroe covers a wide range, ranging between 73.8 and 80.7.

Lower life expectancy among a city's residents suggests there may be health disparities and challenges that can impact overall well-being and longevity. The health disparities may be the result of health inequities or socioeconomic, environmental, or lifestyle/behavioral factors. Additional research and analysis would be needed to understand the specific factors contributing to the lower life expectancy in Monroe.

Figure 4: Average Life Expectancy in Monroe By Census Tract, 2010-2015



Source: NCHS Life Expectancy at Birth for US States & Census Tracts, 2010-2015

Neighborhood Location

Neighborhood location can play a significant role in residential segregation, where minority communities may be concentrated in specific areas. Historic patterns of discrimination, socioeconomic disparities, and systemic factors have contributed to uneven distribution of populations across neighborhoods. Neighborhood segregation can have implications on access to resources, educational opportunities, healthcare services, and overall quality of life. Some neighborhoods may have higher levels of poverty, limited economic opportunities, and inadequate access to essential services, which can perpetuate inequalities and impact social and economic mobility.

Additional research and analysis of available data would be necessary to provide a better understanding of the City's on the racial/ethnic impacts of neighborhood location for Monroe.

Displacement

Foreclosures

Foreclosures are the legal process by which a lender can seize property from a borrower who has defaulted on their mortgage payments. The impact of foreclosure can be particularly severe for minority groups, who have historically faced discrimination and systemic barriers to homeownership and wealth building. African American and Hispanic/Latino groups are more likely to experience foreclosure than white homeowners.³ A foreclosure can result in the loss of homeownership and the accumulation of wealth that come with it. Minority homeowners who lose their homes to foreclosure may experience a significant setback in their ability to build wealth. Foreclosures can also contribute to neighborhood instability as vacant or abandoned properties can attract crime.

Information on foreclosures in Monroe and Snohomish County is not readily available. Additional research into notice of trustee sales, County recordings, and/or Zillow reports would be needed.

Patterns of Evictions

Evictions are the legal process of removing a renter from a rental property. This can have significant impacts on renters, particularly those from historically marginalized communities. Renters from minority communities may face discrimination in the rental application process or be steered towards housing in lower quality neighborhoods with higher rates of eviction. Evicted renters may have difficulty finding new housing, leading to temporary or long-term homelessness, or may have to pay higher rents or put down larger security deposits due to an eviction on their rental history.

The University of Washington conducted research on evictions for King, Pierce, Snohomish, and Whatcom counties between 2004 and 2017.⁴ They provide data about evictions for selected geographies, risk factors that contribute to housing instability such as cost-burden households, and relative eviction risk by race of tenant. Information for the City of Monroe and Census Tracts within the City is summarized in Table 6 (following page). According to the study, the relative risk of eviction compares the probability of eviction occurring for a renting household compared to the probability of eviction across the four-county study area. A risk score greater than one means that eviction was more likely to occur, while a risk score of less than one means that eviction was less likely to occur. As shown in the table, all parts of Monroe have a relative risk of eviction score of less than one. This suggests that residents in Monroe are less likely to face eviction compared to the four-county study area. Note, that the census tracts with the highest relative risks are found in central and southern parts of Monroe which include a higher share of minority populations than the rest of the city.

Table 6: Eviction Rate Summary

Location ⁵	Evictions	Eviction Rate	Relative Risk of Eviction
Snohomish County	2,063	2.17%	1.27

³ Washington State Homeownership Policy Report

⁴ <https://tesseract.csde.washington.edu:8080/shiny/evictionmaps/>

⁵ Note Census Tract geographies do not align with Monroe's city boundary. Some Census Tracts may extend outside of the city's boundary.

City of Monroe	16	0.83%	0.60
Census Tract 522.03 (North Monroe)	0	0%	0.00
Census Tract 522.04 (West Monroe)	1	0.40%	0.29
Census Tract 522.08 (Central Monroe)	9	0.87%	0.62
Census Tract 522.09 (South Monroe)	6	1.08%	0.77

Source: University of Washington Evictions Study

Tenant Relocation Assistance Programs

Tenant relocation assistance programs are designed to provide financial assistance to tenants who are facing displacement due to factors such as eviction, demolition, or the conversion of rental units to condominiums. Minority renters are more likely to face displacement due to factors such as rising rents, gentrification, and redevelopment, and are likely to need relocation assistance as a result. Where tenant relocation assistance programs are available, policy makers and advocates should work to ensure these programs are designed and implemented in an equitable manner. This could include providing outreach and support to minority renters to help them access available resources, increasing the level of financial assistance, and prioritizing assistance for those facing the greatest risk of displacement.

The City of Monroe does not currently have a tenant relocation assistance program. However, the City provides resources to connect residents who need support with other resources. These include county, state, and a network of nonprofits. These can be found on the City’s website at <https://www.monroewa.gov/997/Housing-Utilities-and-Food-Support#:~:text=2%2D1%2D1%20Washington%20is,Rent%20and%20mortgage%20assistance>

Manufactured Home Closures

Manufactured homes are a source of affordable housing for many low-income individuals and families, including minority groups. The closure of manufactured home parks can result in displacement of residents, leading to the loss of affordable housing options. This displacement exacerbates existing housing disparities and potential homelessness risk among minority communities in mobile home parks. Households in mobile home parks face greater economic challenges and financial barriers to relocating when a manufactured park closes.

Once a manufactured park is closed, finding suitable and affordable replacement housing can be challenging. Moving costs, finding alternative housing options, and the potential loss of home equity can significantly impact their financial stability. The lack of affordable replacement housing options can disproportionately affect minority communities, who may face additional barriers related to discrimination, language, and financial resources.

Efforts to protect and preserve manufactured home parks and ensure adequate affordable housing options can help mitigate adverse impacts to low-income households, particularly for minority groups.

The City of Monroe’s Housing Element includes a policy to support the development of manufactured homes. Policy 118 under Goal 5 states:

Permit a variety of smaller-sized housing, including cottage housing, manufactured home parks, or other types where compatible with surrounding neighborhoods.

In addition, the housing inventory in the Housing Element, completed in 2011, found that approximately 1.2% of the overall housing supply in the City consisted of mobile homes.

Snohomish County’s Housing Element includes sections to support the development and preservation of mobile and manufactured home parks. Subsections in Housing Element 1.B.3 state:

Create a comprehensive plan designation and development regulations that will encourage the long-term preservation of mobile and manufactured parks.

Investigate the development of site size and buffering standards for mobile and manufactured parks that permit development in all medium and high density residential zones and conditional development in low density residential zones.

The Department of Commerce’s Manufactured/Mobile Home Relocation Assistance Program provides information on registered manufactured/mobile home communities as well as a list of closures.⁶ According to the data, the City of Monroe includes four manufactured home parks that provide a combined total of 120 housing units. Available information on manufactured home park closures indicates there have been no closures in the City of Monroe since at least 2008.

Housing Lost to Eminent Domain or Condemnations

Eminent domain refers to the government’s power to acquire private property for public use, while condemnation is the legal process by which property is taken through eminent domain. When housing is lost due to eminent domain or condemnation, residents are typically displaced from their homes. This displacement can disrupt communities and social networks and may result in residents having to find alternative housing options, potentially leading to increased housing costs or risks of homelessness. Eminent domain and condemnations can disproportionately affect marginalized and low-income communities. Historically, these communities have been more likely to face displacement and may have fewer resources to secure suitable replacement housing. While eminent domain can result in housing loss, it’s typically pursued for public purposes such as infrastructure projects or urban redevelopment. It’s important that impacted residents receive fair and just compensation for their properties and that any public benefits resulting from eminent domain are realized in a manner that benefits the broader community.

Information on housing lost to eminent domain and condemnations in Monroe is not readily available. Additional research into City records and City actions would be needed.

Displacement Risk Analysis

The Puget Sound Regional Council (PSRC) developed a mapping tool to identify places in the Puget Sound region where people and businesses may be at risk of displacement. The tool combines data of local community characteristics into an index that classifies areas as having lower, moderate, or higher risk of displacement based on current neighborhood conditions.⁷

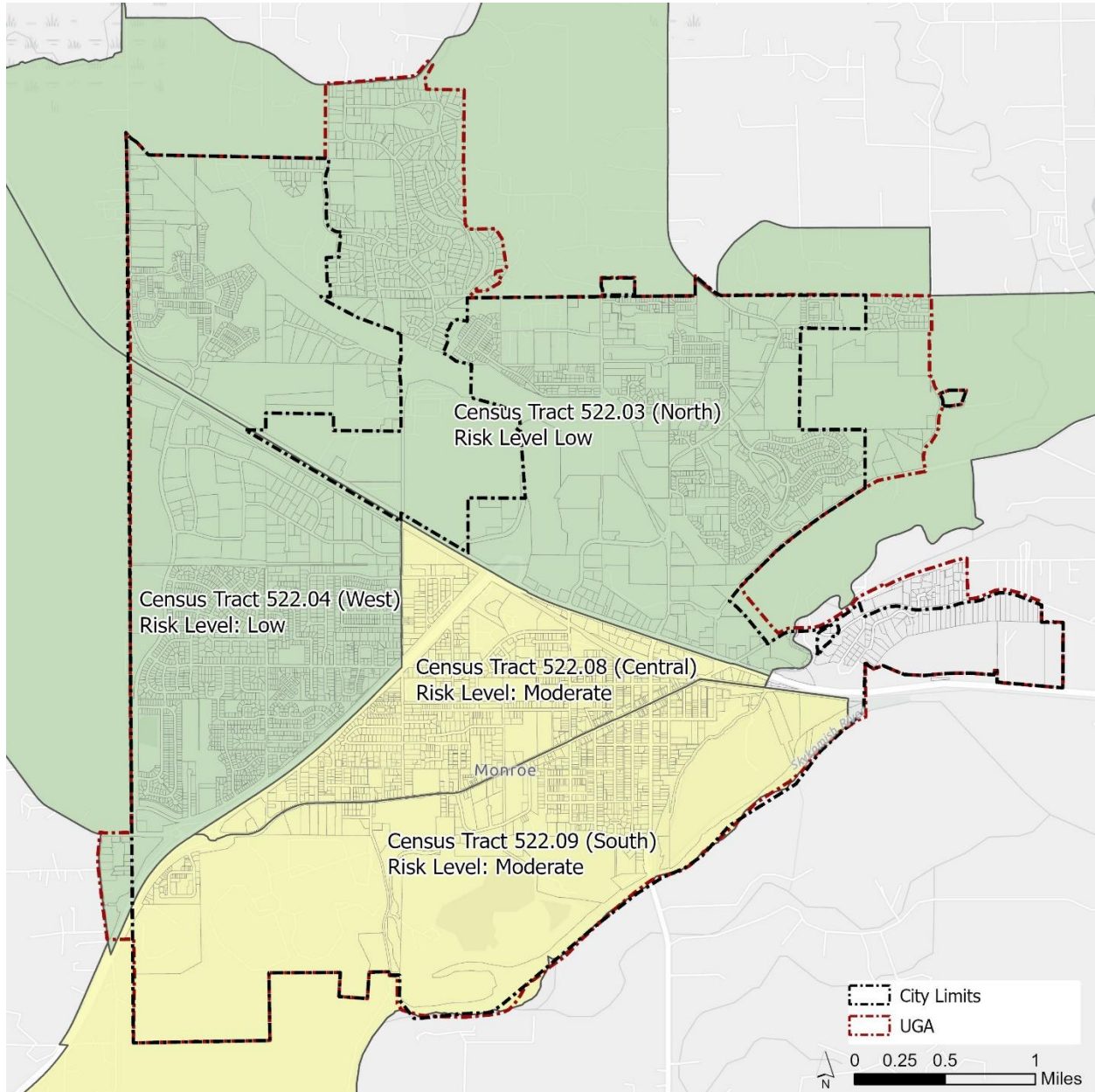
The displacement risk mapping tool is intended to help users understand potential environmental and social impacts associated with the Regional Growth Strategy. Displacement risk is a composite of indicators representing five elements of neighborhood displacement risks. They include socio-economic, transportation qualities, neighborhood characteristics, housing, and civic engagement. The map defines areas with lower, moderate, or higher risk of displacement based on current neighborhood conditions. The data from these displacement indicators provide a comprehensive risk assessment for all census

⁶ <https://www.commerce.wa.gov/building-infrastructure/housing/mobile-home-relocation-assistance/>

⁷ <https://www.psrc.org/media/1780>

tracts in the PSRC region. According to available data, the central and southern areas of Monroe have a moderate risk of displacement (Figure , following page). Other areas of Monroe have low displacement risk.

Figure 5: PSRC Displacement Risk Map Assessment



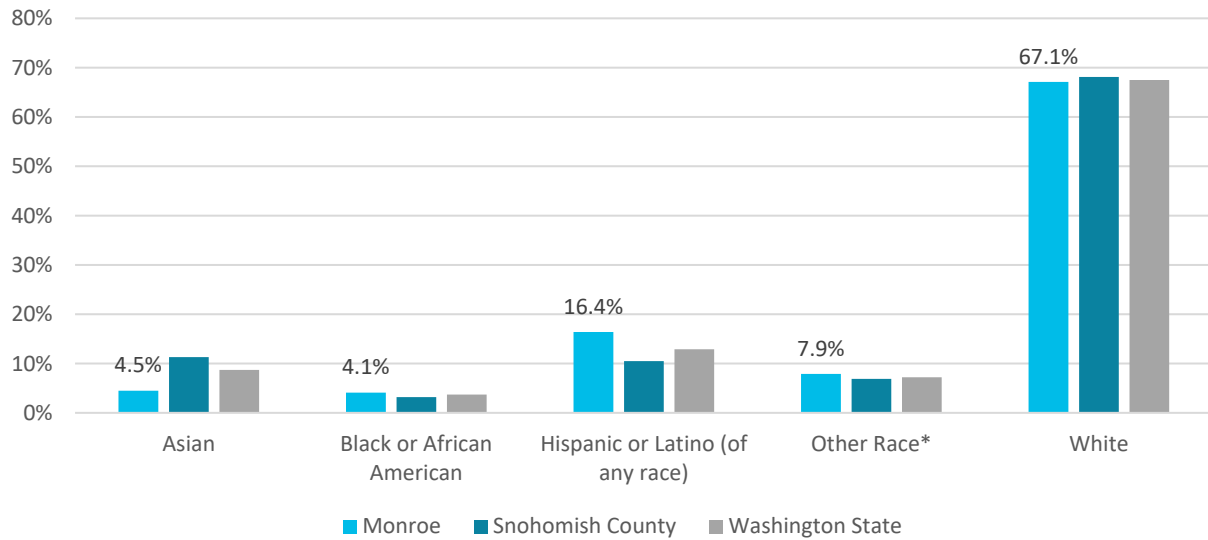
Source: PSRC Displacement Risk Mapping (<https://www.psrc.org/our-work/displacement-risk-mapping>)

Exclusionary Housing

This section of the report focuses on assessing patterns of segregation and exclusion in housing within Monroe. The assessment aims to identify instances of over- or under-representation of demographic groups relative to the overall population, providing insights into spatial patterns and disparities.

Figure 6 provides a summary of racial and ethnic populations within Monroe and Snohomish County. According to the information, the City is similar to the County. The overall share of minority populations in Monroe and Snohomish County are similar at 28.9% and 27.9%, respectively, with two exceptions. The Asian population in Monroe is underrepresented (4.5%) compared to the County (11.3%). Conversely, the Hispanic/Latino population is overrepresented (16.4%) compared to the County (10.5%).

Figure 6: Race and Ethnicity, Monroe, Snohomish County, and Washington State (2020)



* Other race includes people who self-identify as American Indian or Alaska Native, Native Hawaiian and Other Pacific Islander, another race (Other), and two or more races and are not Hispanic or Latino

Source: Source: US Census Bureau, 2016-2020 American Community Survey 5-Year Estimates (Table DP05)

Figure 7: Distribution of Non-white population, Monroe

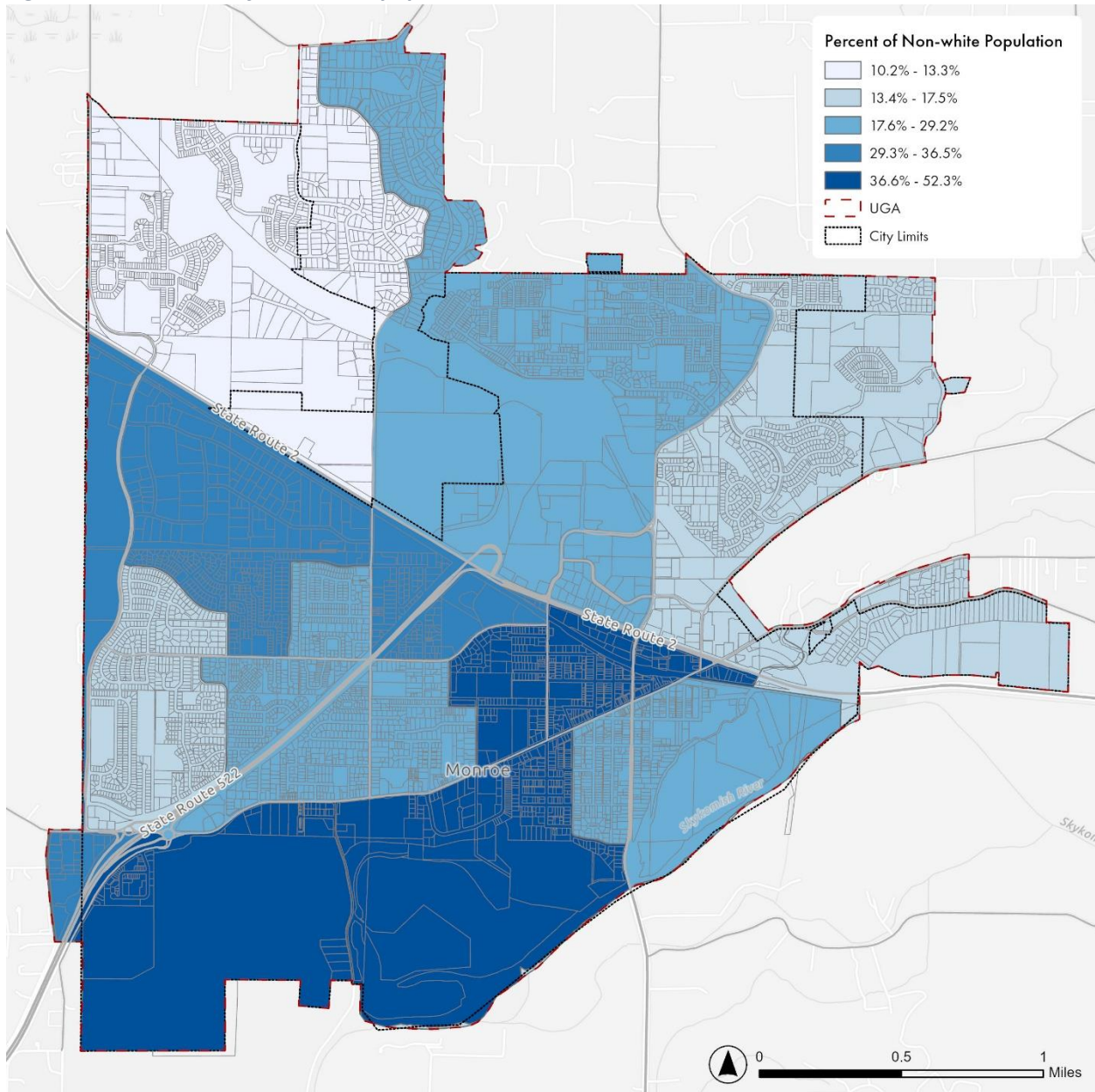


Figure 7 illustrates the composition of white and minority populations among Census Block Groups in Monroe. As shown on the map, areas with a higher proportion of minorities than the city are located south of US- 2. The highest concentrations are located south of Main Street and generally west of S Lewis Street. A similar concentration is located north of Main Street generally between King Street and US- 2. This area also happens to have the highest concentration of renter occupied housing and households with limited English-speaking proficiency.

HOUSING POLICY EVALUATION

As part of the 2024 Comprehensive Plan Update, the project team conducted an Inclusive Planning Assessment for the current 2015-2035 adopted Comprehensive Plan. This initial assessment provided a foundation to assess how the existing Comprehensive Plan goals and policies could influence inclusivity and opportunities accessible for people that live, work, and visit Monroe. The assessment included preliminary findings of all comprehensive plan policies that have guided development and program decisions for Monroe since its adoption in 2015.

This report builds upon that work and uses the Washington State Department of Commerce Racially Disparate Impacts Guidance Draft to evaluate the City’s housing policies and determine whether they are ultimately supportive of GMA goals for housing and adequately addresses racially disparate impacts, displacement, and exclusion in housing.

Initial Screening and Evaluation

As recommended by the Department of Commerce, initial screening questions were considered for each applicable policy:

- 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?

Based on the answers to these initial screening questions, each housing policy was then evaluated and assigned as supportive, approaching, challenging, or not applicable.

Table 7: Racially Disparate Impacts Guidance – Policy Evaluation Framework

Criteria	Evaluation
The policy is valid and supports achieving the GMA goal for housing. There is a need for the policy and/or it addresses identified racially disparate impacts, displacement and exclusion in housing.	S: Supportive
The policy can help achieve the GMA goal for housing but may be insufficient or does not specifically address racially disparate impacts, displacement, and exclusion in housing.	A: Approaching
The policy may challenge the jurisdiction’s ability to achieve the GMA goal for housing. The policy’s benefits and burdens should be reviewed to optimize the ability to meet the policy’s objectives while improving the equitable distribution of benefits and burdens imposed by the policy.	C: Challenging

Policy Evaluation

The following table lists selected adopted City policies that implement the eight goals from the 2015-2035 Monroe Comprehensive Plan. Comprehensive Plan policies were selected based on whether they affected housing development, production, location, or conditions; not all Monroe Comprehensive Plan policies are listed in Table 11. Each row includes a policy, the evaluation outcome, and an explanation for why the policy is assigned that evaluation.

Table 8: City of Monroe Housing Policy Evaluation

Policy	Evaluation	Assessment
P.002, P.064 Implement code enforcement programs and promote ongoing repair and maintenance of buildings.	C	Cost-burdened households in Monroe are more likely to be occupied by Hispanic/Latino or persons of color.
P.014 & P.154 - Establish a maximum number of units that can be served by a single traffic outlet.	C	While this addresses traffic and evacuation, this is a barrier to housing construction as existing transportation infrastructure may not support new housing construction.
P.059, P.088, & P.109 Sustain and enhance the Highway 2/North Kelsey commercial area as a local and regional draw, enhancing its range of retail, service and housing options.	N/A	
P.062, P.089, & P.221 Stimulate the long-term growth of Main Street between Kelsey and 179th Avenue as an important service area, and as a mixed-use extension of Downtown vitality.	A	This section of Main Street contains households that on average have a lower income, are more likely to be renter occupied, crowded, and are more likely to be occupied by Hispanic/Latino or persons of color compared to other areas of Monroe. This policy could be revised to identify potential displacement issues and focus on equitable development.
P.063, P.095 Identify and promote the development of neighborhood commercial centers which serve and are compatible with surrounding residential areas, using location criteria and regulations.	A	Areas that have been historically marginalized often lack or have inadequate community resources such as neighborhood commercial centers. This policy can be revised to include an equitable focus on future development.

Policy	Evaluation	Assessment
<p>P.076, P.099, & P.115 Promote redevelopment and infill along the west Main Street corridor, including higher-density residential and mixed-use development.</p>	A	<p>Main Street overall contains households that on average have a lower income, are more likely to be renter occupied, crowded, are more likely to be occupied by Hispanic/Latino or persons of color compared to other areas of Monroe, and are more likely to have three or more factors that have a risk of displacement. This policy can be revised to address displacement.</p>
<p>P.078 Allow home-based occupations and 'cottage industries' if compatible with neighborhoods and adjacent land uses.</p>	C	<p>Neighborhood compatibility is a vague and subjective term and is often used by those with means and resources to prevent new development. This policy could be updated to provide clear and objective standards for home occupations.</p>
<p>P.090 Consider alternative approaches to development, such as clustering or lot size policies that support overall density targets without undermining desired land use character.</p>	S	<p>Alternative development approaches can allow for smaller lot sizes and smaller or more compact housing which can be a more accessible alternative to a single-family home. However, "character" is a vague term and can lead to inconsistencies in its application.</p>
<p>P.093 & P.110 Support maintenance and revitalization of older housing to stabilize and beautify existing neighborhoods.</p>	A	<p>Homeowners and tenants can benefit from expanded funding for housing rehabilitation assistance. This policy could be further strengthened by developing dedicated local funding sources and staff administration as well as formalized partnerships with community-based organizations.</p>
<p>P.094 Require buffering where new commercial or industrial uses abut residential neighborhoods.</p>	N/A	
<p>P.096 & P.111 Encourage the provision of higher density housing in close proximity to retail, health-care services, parks, and transportation routes.</p>	A	<p>Providing more housing near existing services and public facilities supports the goals of GMA. The City can also study and identify a suite of incentives for housing in these areas and streamline permitting for all housing, including higher density.</p>

Policy	Evaluation	Assessment
P.112 Coordinate with non-profit agencies and other groups providing low to moderate-income housing.	S	Non-profit agencies and affordable housing developers are key partners in meeting GMA goals and furthering housing supply.
P.113 Promote the development of affordable housing.	S	The provision of affordable housing supports the goals of GMA.
P.114 Promote housing design and construction that enhances community image and fosters compatibility with surrounding development.	C	In this context, “community image” and “compatibility” are unspecific and vague and could lead to inconsistencies in where and how this policy applies. This policy may serve as a barrier to meeting GMA goals and housing needs. This policy and any implementing provisions could be revised to streamline housing design and construction through objective standards that do not restrict the types of homes that can be built.
P.116 Allow increased building heights and density within the Downtown and Al Borlin neighborhoods.	S	This policy supports GMA goals by reducing restrictions on housing types in these geographic areas.
P.117, P.225 Allow the development of Work/Live units within Mixed Use areas and Downtown.	S	This policy can benefit lower-income and/or Hispanic/Latino or persons of color to the extent that these units remain affordable. However, work/live units may not be accessible to all Monroe residents, especially in highly desirable areas. This policy could be strengthened by allowing streamlined conversion of non-residential, commercial buildings to work/live units and providing access to measures that could protect Hispanic/Latino or persons of color from rent increases or other displacement measures.
P.118 Permit a variety of smaller-sized housing, including cottage housing, manufactured home parks, or other types where compatible with surrounding neighborhoods.	C	In this context, “compatible with” is unspecific and vague and could lead to inconsistencies in where and how it applies. If implemented with emphasis on compatibility this policy may serve as a barrier to meeting housing needs.

Policy	Evaluation	Assessment
<p>P.119 Encourage the development of housing for special needs populations that may include the following:</p> <ul style="list-style-type: none"> • integration of universal design standards to assist elderly and other special needs populations to stay in their homes; • coordination of housing and service providers in serving special needs populations; and • promoting the development of ongoing operations of supportive housing with appropriate services for people with special needs throughout the county and region. 	S	Seniors and people with disabilities significantly benefit from universal design that closes ADA loopholes. Supporting seniors and those with disabilities to remain in their housing furthers GMA goals.
<p>P.120 Seek investment in streetscape improvements, transportation infrastructure, and public facilities.</p>	S	Increasing public facilities and services in existing neighborhoods promotes inclusive and accessible neighborhoods.
<p>P.125 Coordinate with transit providers to establish public transit service in areas of higher density land use and mixed use development.</p>	S	Increasing public transit services to population dense areas promotes inclusive and accessible neighborhoods.
<p>P.156 Direct new development to those areas where adequate transportation facilities exist or will be provided as defined in City-adopted facilities plans.</p>	A	Use of existing transportation facilities supports the goals of GMA and results in neighborhoods with transit services. At the same time, new or upgraded transportation facilities should be considered for areas that have been historically disinvested in.
<p>P.167 Encourage the development of east/west corridors.</p>	A	Corridor development can increase multi-modal transportation options. However, if implemented without regard to other housing needs, this policy may result in displacement.
<p>P.170 Strive to provide an access point to the Skykomish greenbelt at the southern terminus of 179th Avenue.</p>	S	Increasing neighborhood access to parks and open space furthers GMA goals.

Policy	Evaluation	Assessment
<p>P.215 Encourage new development and redevelopment in the downtown area, including related investment in streetscape improvements, transportation infrastructure, and public facilities.</p>	<p>A</p>	<p>Increasing investment in the downtown area furthers GMA goals. However, the downtown area overall contains households that on average have a lower income, are more likely to be renter occupied, crowded, are more likely to be occupied by Hispanic/Latino or persons of color compared to other areas of Monroe, and are more likely to have three or more factors that have a risk of displacement. This policy can be revised to address displacement.</p>

Policies that begin to undo disparate impacts, displacement, exclusion, and reduce displacement risk are grouped into five broader categories. Policies can:

- Increase affordable housing production.
- Preserve existing affordable housing.
- Protect existing communities and households.
- Ensure the benefits of investment and development are equitably distributed.
- Begin to undo racially disparate impacts, exclusion, and displacement.

Increase affordable housing production.

Adopted policies that further this category includes the promotion of affordable housing production and coordination with non-profit agencies and other groups providing low to moderate-income housing. The Monroe Development Code contains several incentives for affordable housing including density bonuses. However, these incentives may not fully encourage affordable housing production as they are still subject to development standards that can constrain housing development including lot coverage, lot size, and parking requirements.

Monroe’s existing policies that support this aim could be strengthened by a variety of implementing programs as the policies are broad and lack specificity.

Preserve existing affordable housing.

None of the existing City policies directly address the preservation of existing affordable housing.

Protect existing communities and households.

Many Monroe policies encourage development or redevelopment of certain areas or corridors in the City but do not address the potential impacts or displacement that existing communities and households in these areas could experience.

Ensure the benefits of investment and development are equitably distributed.

Existing policies encourage the development of housing near existing retail, health-care services, parks, and transportation routes which can help ensure new housing units have access to these amenities. However, there is no existing policy that encourages investment in areas where existing households do not have access to these types of amenities.

Begin to undo racially disparate impacts, exclusion, and displacement.

None of the existing City policies directly address undoing racially disparate impacts, exclusion, and displacement.

HOUSING POLICY RECOMMENDATIONS

Housing Policies to Consider

This section presents a menu of housing strategies and policies that the City of Monroe could include in the Comprehensive Plan Housing Element update to address housing affordability, racially disparate impacts, exclusion, and displacement. Addressing these issues will require a variety of strategies at different scales.

Category	Policies
<p>Increase affordable housing production</p>	<p>Use local and/regional resources to generate revenue for housing, particularly for households with extremely low-, very low- and low-incomes.</p>
	<p>Adopt funding tools to support the development of affordable housing. The City could consider several programs to lower the cost of development:</p> <ul style="list-style-type: none"> ▪ SDC financing Credits ▪ Sole Source SDCs ▪ Fees or other dedicated revenue such as street, stormwater, or sewer funds.
	<p>Adopt incentives, strategies, actions, and regulations that increase the supply of housing for households with extremely low-, very low- and low-incomes. This could include:</p> <ul style="list-style-type: none"> ▪ Studying permit reviews for affordable housing ▪ Encouraging land acquisition and land banking
	<p>Implement strategies that address cost barriers to housing affordability.</p>

Category	Policies
	Increase affordable housing options for all residents in areas with that are within easy access to job centers or transit.
Preserve existing affordable housing	Dedicate resources to preserve existing housing for low-income households. <ul style="list-style-type: none"> ▪ Apply long-term housing affordability controls ▪ Assist in maximizing use of housing rehabilitation programs
	Adopt incentives, strategies, actions, and regulations that reduce barriers and promote access to affordable homeownership.
	Develop and promote community land trusts to allow permanently affordable ownership housing.
	Consider adopting regulations or ordinances that could condition the demolition or replacement of certain housing types on the replacement of such housing elsewhere, fees in lieu of replacement, or payment for relocation expenses of existing tenants.
Protect existing communities and households	Adopt incentives, strategies, actions, and regulations that encourage equitable development and mitigate displacement.
	Put in place strategies and regulations that protect housing stability for rental households. This could include tenant protections.
	Proactively conduct outreach and educate the community about fair housing rights and responsibilities.
Ensure the benefits of investment and development are equitably distributed.	Adopt incentives, strategies, actions, and regulations to create and sustain neighborhoods that provide equitable access to parks and open space, safe pedestrian and bicycle networks, clean air, soil and water, healthy foods, high-quality education, affordable and high quality transit options, and jobs.
	Adopt incentives, strategies, actions, and regulations that increase the ability of all residents to live in the neighborhood of their choice and reduce disparities in access to areas with access to transit, open space, good schools, jobs, and amenities.
	Protect the health of residents and mitigate any exposure to environmental hazards in neighborhoods.
	Use measures to track implementation and performance to ensure policies are working as intended to address racially disparate outcomes, exclusion, displacement, and displacement risk.

Category	Policies
<p>Begin to undo racially disparate impacts, exclusion, and displacement</p>	<p>Engage with communities disproportionately impacted by housing challenges in developing, implementing, and monitoring policies that reduce and undo harm to these communities. Prioritize the needs and solutions expressed by these disproportionately impacted communities for implementation.</p>
	<p>Engage and partner with communities most disproportionately impacted by housing challenges to inform strategies, actions, regulations, and resource allocation decisions that reduce and undo harm to these communities.</p>
	<p>Adopt intentional, targeted strategies, incentives, actions, and regulations that repair harm to households from past and current racially discriminatory land use and housing practices.</p> <ul style="list-style-type: none"> ▪ Promote and ensure equal opportunity housing ▪ Implement inclusionary housing policy ▪ Conduct a comprehensive review of City code and policies to remove discriminatory language or policies that may directly or indirectly perpetuate segregation. This includes reviewing the use of the terms “single-family” residential use, “neighborhood compatibility,” and finding of conditional approval.
	<p>Participate in relocation assistance to low- and moderate-income households whose housing may be displaced by condemnation or city-initiated code enforcement.</p> <ul style="list-style-type: none"> ▪ Link code enforcement with public information programs
	<p>Strive to increase class, race, and age integration by equitably dispersing affordable housing opportunities. Discourage neighborhood segregation and the isolation of special needs populations. When possible, help the Housing Authority and non-profit organizations buy such housing.</p> <ul style="list-style-type: none"> ▪ Encourage universal design practices and visitability (housing designed in such a way that it can be lived in or visited by people who have trouble with steps or who use wheelchairs or walkers)
	<p>Work to decrease disparities in homeownership by race and ethnicity.</p> <ul style="list-style-type: none"> ▪ Encourage first time homebuyer programs

CONCLUSIONS

Based on the comprehensive assessments and review of available data and policies, the following key conclusions can be drawn.

- It is evident some racial and ethnic disparities exist with housing in Monroe. Black or African American households are severely cost-burdened and homeownership rates among American Indians and Alaska Natives is low compared to the overall County.
- Although some data related to outcomes for various racial and ethnic groups is limited or not available, information for the City as whole indicates there are disparities present in per capita income, education attainment levels, and life expectancy when compared to the State or County. These areas may contribute to racial/ethnic disparities.
- Residents in Monroe are less likely to face eviction compared to other residents throughout the County.
- Residents have a low or moderate risk of displacement based on PSRC's displacement risk analysis. Areas where moderate risk of displacement exists – central and southern parts of Monroe – also have a higher overall share of minority populations within the City.
- Some housing policies include subjective language that has the potential to contribute to inequitable outcomes and perpetuate disparate impacts.

In conclusion, this report highlights the need to achieve fair and equitable housing outcomes for all residents in Monroe. The information in this report can be used to inform needed targeted policies and interventions to address these issues. A comprehensive and multi-faceted approach is required to tackle housing inequities effectively. This should include further exploration of this report's housing policy recommendations to identify the appropriate strategy, or strategies needed to address known disparities.