

# Racially Disparate Impacts – Housing Policy Evaluation

To: Jonathan Kesler, Planning Manager, City of Medina

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Re: City of Medina 2024 Comprehensive Plan Update

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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
<p>H-G1 The City shall preserve and foster housing development consistent with Medina’s high-quality residential setting.</p>	<p>Challenging</p>	<p>Goal H-G1 aims to preserve and foster housing development but is hindered by vague language and a lack of focus on equity, displacement, and community engagement. The goal may inadvertently limit housing diversity and access. Define what constitutes “high-quality residential setting” to provide clearer guidance on development expectations.</p>
<p>H-G2 The City shall explore affordable housing opportunities.</p>	<p>Approaching</p>	<p>Goal H-2 expresses a positive intention to explore affordable housing opportunities but lacks specificity, clarity, actions, and measures to address equity and displacement risks. Provide details on the types of affordable housing being considered to enhance understanding of the goal’s implications.</p>
<p>H-P1 The City shall minimize changes to existing zoning designations except as to meet above goals when deemed necessary by citizens.</p>	<p>Challenging</p>	<p>Policy H-P1 seeks to minimize zoning changes but is limited by a lack of clarity, equity considerations, and measures to mitigate displacement risks. The policy may restrict opportunities for diverse and affordable housing. Define what “deemed necessary by citizens” entails and establish clear mechanisms for community input.</p>
<p>H-P2 The City shall consider ways to restrict the size of homes in order to retain the character of the community.</p>	<p>Approaching</p>	<p>While policy H-P2 likely will not impact the City’s ability to provide housing in an equitable way, qualifying the goal of the policy with support for “community character” lacks a consideration of community needs and could potentially</p>

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		supportive exclusive policies elsewhere in the City's plans and regulations. Consider referencing other community needs such as housing availability, housing affordability, and environmental protection instead.
H-P3 The City shall seek to maintain the informal single-family character of its neighborhoods, including preventing the intrusion of non-residential activities.	Challenging	Policy H-P3 focuses on maintaining the single-family character of neighborhoods but is limited by its narrow scope, lack of equity considerations, and potential displacement risks. The policy may unintentionally reduce housing diversity and accessibility.
H-P4 When a home is constructed such that it may potentially have no feasible resale market as a single-family residence, the owners should be aware that this would not set the stage for a future conversion to a nonresidential use.	n/a	This policy is not applicable to development standards and is unlikely to have impacts on racial equity, exclusion, and displacement.
H-P5 The City should work with cities and community representatives on countywide or subregional funding sources for housing development, preservation, and related services.	Approaching	Policy H-P5 promotes collaboration on funding for housing but lacks specificity on implementation, equity measures, and strategies to mitigate displacement risks. The intent is positive, but it needs more clarity and commitment to effectively address the community's housing needs.
H-P6 The City should continue participation in inter-jurisdictional organizations to assist in the provision of affordable housing on the Eastside.	Approaching	Policy H-P6 emphasizes collaboration for affordable housing but lacks specificity in implementation, equity measures, and strategies to mitigate displacement risks. The intent is positive, but more clarity and commitment are needed to effectively address housing needs. Outline specific actions the

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		<p>City will take within inter-jurisdictional organizations to ensure effective participation. Include explicit strategies to ensure that affordable housing efforts prioritize the needs of marginalized communities.</p>
<p>H-P7 The City shall continue to make contributions to agencies that support affordable housing.</p>	<p>Approaching</p>	<p>Policy H-P7 emphasizes contributions to support affordable housing but lacks specificity regarding implementation, equity measures, and strategies to mitigate displacement risks. The intent is beneficial, but more clarity and commitment are needed to effectively address community housing needs. Clarify the nature and amount of contributions to agencies, as well as criteria for selecting those agencies, to ensure alignment with community needs. Include specific strategies to ensure that contributions focus on supporting marginalized communities and addressing housing disparities.</p>
<p>H-P8 The City shall explore additional affordable housing options that are compatible with the City’s high-quality residential setting.</p>	<p>Approaching</p>	<p>Policy H-P8 aims to explore additional affordable housing options but lacks specificity in implementation, equity measures, and strategies to mitigate displacement risks. The intent is positive, but more clarity and commitment are necessary to effectively address housing needs. Clarify what specific affordable housing options will be explored and outline criteria for assessing their compatibility with the “residential setting”.</p>

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<p>H-P9 The City shall not discriminate between a residential structure occupied by persons with handicaps and a similar residential structure occupied by a family or other unrelated individuals.</p>	<p>Supportive</p>	<p>Policy H-P9 establishes a strong framework against discrimination, promoting equity for individuals with disabilities in housing. However, it could benefit from additional clarity, community engagement, and consideration of broader equity issues.</p>
<p>H-P10 The City shall assure that zoning does not unduly restrict group homes or other housing options for persons with special needs by making reasonable accommodations in its rules, policies, practices, and services, when such accommodations may be necessary, to afford persons with disabilities equal opportunity to use or enjoy a dwelling.</p>	<p>Supportive</p>	<p>Policy H-P10 establishes a strong framework for ensuring that zoning does not restrict housing options for individuals with special needs. However, it could benefit from additional clarity, community engagement, and broader equity considerations. Clarify what constitutes "reasonable accommodations" and provide examples to guide implementation.</p>
<p>H-P11 The City shall permit group living situations that meet the definition of "family status", including where residents receive such supportive services as counseling, foster care, or medical supervision, within a single-family house.</p>	<p>Supportive</p>	<p>Policy H-P11 establishes a positive framework for allowing group living situations that provide supportive services. However, it could benefit from additional clarity, community engagement, and broader considerations of equity. Needs to clearly define "family status" and provide examples of acceptable group living situations to eliminate ambiguity.</p>
<p>H-P12 To reduce the loss of households, the City should discourage lot aggregation that impacts the scale and character of the neighborhood.</p>	<p>Approaching</p>	<p>Policy H-P12 effectively aims to prevent displacement by discouraging lot aggregation but lacks concrete strategies for accommodating housing needs and promoting equity. The intent is positive, but further clarity and inclusivity</p>

Policy	Evaluation	Explanation
		are needed. Clarify what is meant by "scale and character of the neighborhood" to guide implementation and decision-making.