



Racially Disparate Impacts Memorandum

December 2024

Introduction

The following memo provides recommendations for the City of Vancouver’s approach to address the new requirements imposed by Washington State House Bill 1220 (HB 1220), specific to racially disparate impacts (RDI) in housing. This report was completed based on guidance from the Washington State Department of Commerce and examples from other jurisdictions in Washington. The specific requirements for the housing element of the comprehensive plan are discussed followed by explanatory text for meeting each requirement.

Legislative Requirements

[Washington State House Bill 1220](#), which passed in 2021, provided an updated set of requirements to the Growth Management Act (GMA) (RCW 36.70A.070) specific to the housing element. Any jurisdiction in Washington State compelled by the GMA to update their comprehensive plan in 2024 or after must adhere to these new requirements. In addition to the main focus of this bill- matching anticipated population growth with affordable housing- there is an additional component to ensure that new and existing housing policy works to address and mitigate racially disparate impacts (RDIs), displacement and exclusion.

Sec 2. (2) A housing element ensuring the vitality and character of established residential neighborhoods that:

...

(e) Identifies local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:

(i) Zoning that may have a discriminatory effect;

(ii) Disinvestment; and

(iii) Infrastructure availability;

(f) Identifies and implements policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions;

(g) Identifies areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments; and

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

Source: RCW 36.70A.070 (2022)

Definitions

It's important to create a common understanding for the key terms used in HB 1220. The WA State Dept. of Commerce released [Racially Disparate Impacts Policy Review Process](#) which included this set of definitions:

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

- 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.

Displacement risk: The likelihood that a household, business or organization will be displaced from its community.

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

Racially disparate impact (RDI): When policies, practices, rules or other systems result in a disproportionate impact on one or more racial groups.

Commerce Guidance for RDI in Housing Element

The Department of Commerce supplied a [Housing Element Checklist](#) to review for compliance with the newest requirements of HB1220 for both affordable housing and RDI presented as elements 1-4 of the following list. These represent the first four chapters of the following memo.

- 1. Include a statement of whether data shows if there are disparate impacts.**
 - a. This statement should indicate if housing data stratified by racial groups and historic evidence demonstrates RDI.
 - Comprehensive plan should include an analysis of the data collected in the equity analysis, housing needs assessment, and any supplemental US Census demographic data (such as the indices included in the RDI Spatial Mapping Appendix).
- 2. Review of housing element policies and regulations that have led to these impacts.**
 - a. Conduct an audit on past policy and regulation, for form (language) and function (results), and present the results of this analysis.
 - Comprehensive plan should include the results from RDI Policy Audit for Title 20, 2011 Comprehensive Plan, and other applicable housing policy.
- 3. Include policies to address these impacts, or that address development of more affordable housing, preservation of existing affordable housing, and protection of existing housing.**
 - a. Based on the RDI data and previous RDI inducing policies (1 & 2) target new policies to mitigate for those impacts.
 - New housing policy that intends to undo identified RDI, should be denoted within the Comprehensive Plan Housing Element.
- 4. Discussion and/or map of areas that may be at risk of displacement.**
 - a. Identifying displacement risk by neighborhood so as to target policies by specific neighborhoods and groups.
 - Comprehensive plan should present displacement risk map, identified higher risk areas (RDI priority neighborhoods) and any supporting findings of displacement.

Supporting Chapters

The City's response to addressing RDI is best informed if it examines policies that are best suited to the RDI concerns of individual neighborhoods. As such this memo includes two supplemental chapters that identify neighborhoods of particular concern, based on RDI indices or a history of racial segregation, and provide specific policy recommendations.

5. Tailoring RDI Mitigation to the Most Impacted Neighborhoods

- a. Identifies the 5 neighborhoods with a high BIPOC population share and poor RDI outcomes.
- b. For each neighborhood, based on their specific characteristics, provide recommendations to undo RDI and support growth without displacement.

6. De-Segregating White Dominant Neighborhoods

- a. Identifies 4 neighborhoods in Vancouver with a history of racial deed restrictions (one removed due to a lack of present day racial segregation)
- b. For each neighborhood, based on their specific characteristics, provide recommendations to create opportunities for BIPOC groups to move into the neighborhood.

1. Data & Historic Precedent Indicating RDI

Include a statement of whether data shows if there are disparate impacts.

Racially Disparate Impacts

An analysis of RDI in housing involves looking at a community's breakdown of race and ethnicity and comparing it to the number of households that rent as opposed to own, their housing costs (rent/mortgage). The City has already reviewed both of these factors individually through the Equity Analysis (EA) and Housing Needs Analysis (HNA).

Upon a review of the EA and HNA a few statistical findings stand out:

- Population Share
 - Between 2011 and 2021 the population of American Indian and Alaskan Native (AIAN) and Black fell 22 and 20% respectively ([EA](#))
 - Vancouver's Pacific Islander population is rapidly growing, increasing 21% from 2020 to 2021. ([EA](#))
 - In comparison to their distribution in the county overall, POC are more likely to live in urban areas. ([EA](#))
- Housing Type
 - BIPOC residents (excluding Asian) are more likely to live in multifamily and less likely to live in single family. ([EA](#))
 - BIPOC residents (excluding Asian) are more likely to rent instead of own their housing with homeownership rates from 26-35% compared to the city's 51% ([EA](#))
- Economic / Housing Cost-burden
 - Median household income was lower for Black and Hispanic than any other racial group and \$24,185 and \$10,973 respectively, below Vancouver's median. ([HNA](#))
 - Housing cost-burden and severely cost-burden by race is higher for Black or African American (52%), and Hispanic or Latino (45%). ([HNA](#))
- Transportation
 - BIPOC residents (excluding Asian) are more likely to rely on public transit or carpooling for their commutes compared to county. ([EA](#))
- Educational Attainment
 - Hispanic/Latine and Native Hawaiian/Other Pacific Islander students continue to be disproportionately attending lower performing schools according to 3rd grade reading and math standards. ([EA](#))
 - BIPOC (excluding Asian) students perform worse on kindergarten readiness, 3rd and 8th grade standardized tests than their white or Asian peers. ([EA](#))
- Green Space
 - Block groups with higher proportions of people of color have 2.4% less tree canopy than the average for the city. ([EA](#))

These data points demonstrate a Racially Disparate Impact exists between different racial groups and their ability to afford housing, rates of homeownership, and other factors indicating wealth and attainment.

Historic Context

Nearly all racially disparate or equity analyses in housing look at a similar set of known policies or events that have caused inequalities in housing particular to specific racial groups. These include Redlining; VA Homeownership loans; Covenants, Conditions, and Restrictions (CC&R). In addition, Vancouver specifically saw public housing segregation through the Vancouver Housing Authority war-time housing. I will discuss each of these below.

Redlining

The Home Owners' Loan Corporation (HOLC) was a federal agency created under New Deal legislation focused on buying and refinancing loans where borrowers were behind on repayment and issuing lower cost terms. In addition, it was notoriously the entity behind redlining, which graded the "residential security" or riskiness of different neighborhoods of many cities across the US, in a practice later colloquially known as Redlining. These mapped boundaries were defined by racial demographic data with areas having a higher POC percentage given a riskier rating. Banks and lenders would use these maps to determine which areas would be given loans to build and buy homes.

Emerging evidence is continuing to find present-day health disparities and crime for residents in formerly redlined communities. For example, there have been identified higher rates of heart disease, diabetes, pre-term death, COVID-19 outcomes, mental health, and gunshot ER visits. ([Egede, 2023](#)) These neighborhoods also experience increase housing instability and eviction. ([Gerken, 2023](#))

Fortunately, Clark County doesn't have any recognized historic redlining maps, however its larger neighbors Portland, Tacoma, Seattle, and Spokane all have officially recognized redlining maps. ([University of Richmond](#))

Covenants, Conditions, and Restrictions

CCRs were another widespread method to restrict POC homeownership through writing requirements into a property's deed, plat, home owners association, or other property documents. Unfortunately, a fairly common practice during the 1930-50s was to restrict the sale or occupation of the property non-white individuals and families. These requirements "run with the land" to restrict any subsequent property buyer from being a POC. While the earliest so far reported CCR in Washington State was from 1907 the practice became much more common after 1926 after the Supreme Court ruling of *Corrigan v. Buckley*. These deed restrictions were commonplace even after the *Shelley v. Kramer* decision of 1948 which ruled them to be unenforceable, until they were finally made illegal in the 1968 Fair Housing Act.

The [University of Washington Civil Rights and Labor Consortium](#) has an ongoing project to identify and record CCRs across the state. They recently published their findings for Vancouver and Clark County. They found that within Clark County there were 1,367 parcels and 34 subdivisions with racially restrictive covenants. Typical restrictions included language banning sale of the property to "anyone other than the white (or Caucasian) race." However, some spelled out individual races that were restricted from purchase, particularly Black and Asian.

- ❖ "and that they shall never sell, give, convey, or lease any interest therein to any person of the **African or Mongolian races.**" (Home Addition Plat, 1926)
- ❖ "be in any manor used or occupied by **Chinese, Japanese, or Negroes**, except that persons of said races may be employed as servants by residents" (Telocaset Plat I & 2, 1940; Slerat Highlands Repeat Blocks B & C, 1947)
- ❖ "that no **oriental or negroes** may occupy any building except as servants of the owners" (Lincola Park, 1938)

While the earliest reported CCR in Washington State was from 1907 the practice became much more common after 1926 after the Supreme Court ruling of [Corrigan v. Buckley](#). These deed restrictions were commonplace even after the [Shelley v. Kramer](#) decision of 1948 which ruled them to be unenforceable, until they were finally made illegal in the [1968 Fair Housing Act](#). Vancouver's neighborhoods still exhibit residual segregation as a product of CCRs in its past.

The map shown below portrays the distribution of identified racial CCRs in Clark County overlaid on a map of BIPOC as a share of the total population. Broadly, the "white only" neighborhoods with historic CCRs are still some of the least racially diverse, with BIPOC share of the population ranging between 11 and 30 percent. Historic segregation has left its mark on the demographic background of the city as a whole, impacting AAPI, Native American, and all other BIPOC groups.

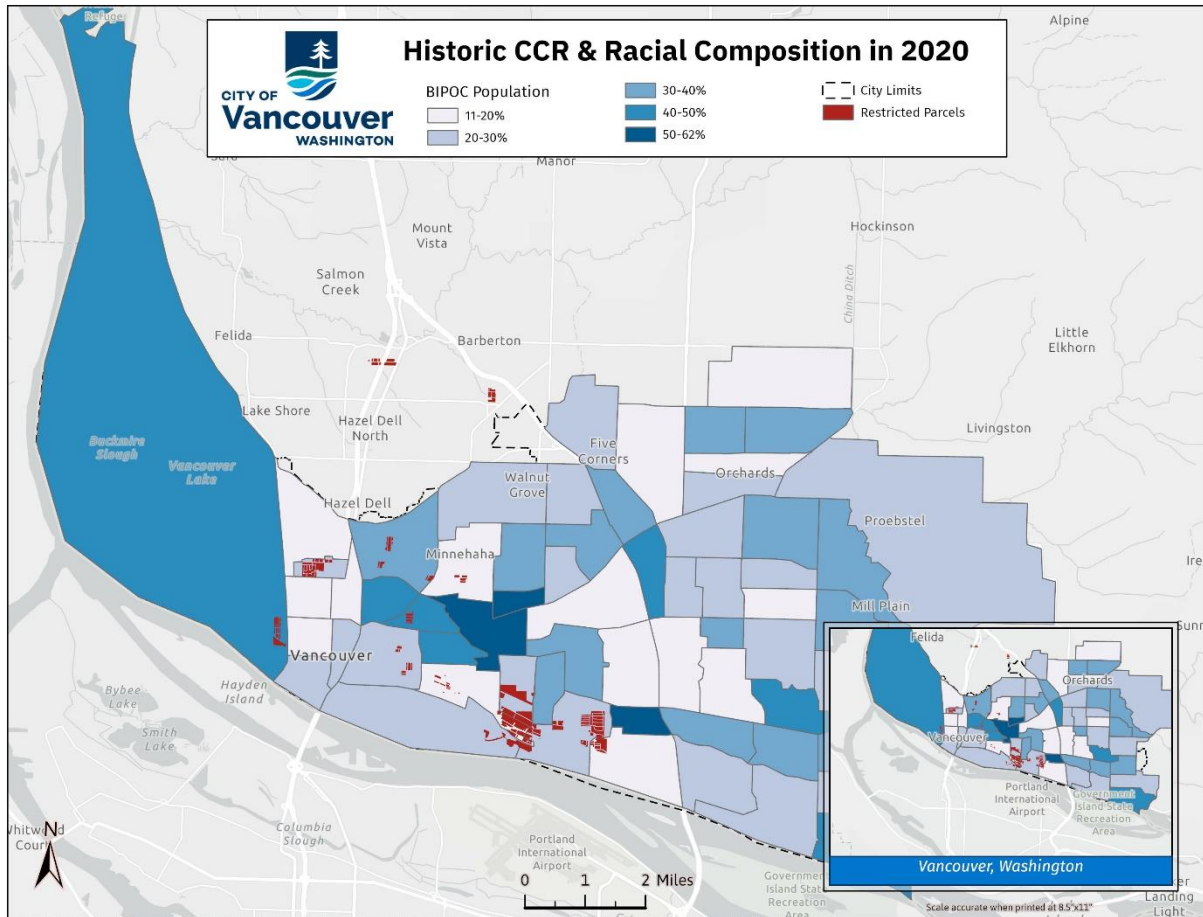


Figure 1. Historic CCR and Racial Composition in 2020 (Source: Washington State, University of Washington)

Within Vancouver, higher prevalence of CCRs is found in Heights and Evergreen Highlands neighborhoods, broadly the area defined by Millplain to the river, and Andresen to 98th Ave. In addition, the Lincoln Neighborhood and Sampson Ave in East Fruit Valley and others scattered throughout Central Vancouver. The presence of historic CCRs within these communities likely contributed to racial inequities present within these neighborhoods.

VHA Public Housing Segregation & Closure

The Vancouver Housing Authority was the city's public housing organization. During WW2, the VHA was responsible in creating 12,350 family units and 10,000 dormitory units for those moving into Vancouver to work in the Kaiser shipyards and the broader war-industry.

([Vancouver Housing Authority, 1945](#)) Many of the emigrants who moved into VHA public housing were black, with the 1945 city census reporting nearly 9,000 black people in 1945 up from just 18 in 1940. ([HistoryLink](#)) There is evidence of segregation within the projects, based on the demographics of the projects and in historic documents. (Fourth Plain Forward).

In addition, upon the end of the war and the wartime industries the VHA opted to demolish much of the public housing ending what many long-term residents described as a “foreign invasion.” The Authority also feared that leaving the housing available could lead to a damaging drop in property values. “The great unbridled development would, inside of a generation, be a slum area that no small community in the country could tolerate.” ([Vancouver Housing Authority, 1945](#)). Only one thousand or roughly 20% of the wartime homes were resold to “postwar stranded population, low-income families, and military personnel.” (Fourth Plain Forward) Internal memos describe how these would not be used to house “colored families.” The remaining nearly 80% of the housing units from the projects were demolished and the land used to create schools and carefully controlled subdivisions, benefitting the pre-war primarily white residents and returning Veterans. VHA’s policies appear to have direct intentions to force out the POC temporary war workers, while creating more affordable housing and public resources for the existing white community.

[VA Homeownership Loans](#)

Following WWII, the federal government provided home loan backing, a \$2,000 guarantee of repayment, for any returning Veteran who served at least 90 days, which went a long way at the time for securing housing. ([Veterans Association](#)) Over time the program was adjusted to provided more financial support as home prices increased, however, because of historic unequal recruiting practices, these policies have disproportionately benefitted white families. This policy has been credited as one of the most damaging to long-term POC homeownership.

2. Existing Policy Audit

Review of housing element policies and regulations that have led to these impacts.

The City of Vancouver is required to complete an audit of past housing policies that have led (or have the potential to have led to identified RDI’s. This policy audit should include a set of guiding questions, criteria (scoring system), and recommended changes. Then reviewing the historic and modern demographic context provides a way to understand the direct and indirect RDIs, displacement, and exclusion.

Specific lenses through which each policy was reviewed include:

1. **Language clarity and potential for bias.** Whether the policy includes use of coded or unclear language that can lead to inequitable application.
2. **Deficit-based language.** Whether the policy uses language that can lead to an under-appreciation of the needs and contributions of people in specific groups.
3. **Impact on housing stock.** Whether the policy introduces barriers, such as excessive regulation, or incentives to overall housing stock and affordable housing to meet Bellevue’s goals.
4. **Impact on housing mix.** Whether the policy prioritizes certain residential uses, and which uses are prioritized.
5. **Distribution of impact by geography, income, and community.** Whether the policy creates benefits and burden or risks that will be unevenly distributed.

6. **Mitigation for anticipated impacts.** Whether the policy includes consideration of impacts and plans to mitigate them, including displacement risk.

These RDI analysis ‘lenses’ are from Bellevue’s [Racially Disparate Impact Analysis](#) based on Washington Department of Commerce Guidance. Vancouver should review each policy through these lenses and subsequently the rubric below provided by WA Dept. of Commerce to score each policy.

Table 1: Equity Policy Analysis

Criteria	Evaluation
The policy is valid and supports meeting the identified housing needs. The policy is needed and addresses identified racially disparate impacts, displacement, and exclusion in housing.	“S” Supportive
The policy can support meeting the identified housing needs but may be insufficient or does not address racially disparate impacts, displacement, and exclusion in housing.	“A” Approaching
The policy may challenge the jurisdictions' ability to meet the identified housing needs. 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
The policy does not impact the jurisdiction’s ability to meet the identified housing needs and has no influence or impact on racially disparate impacts, displacement, or exclusion.	“NA” Not Applicable

Source: [Washington Department of Commerce HB1220 RDI in Housing](#)

Following the discussion on policy evaluation criteria the city provided the results of their RDI analysis on both housing and non-housing policies. These could be useful in Vancouver’s analysis, informing some potential areas of language obscurity, bias, or unintended consequences.

Identified Concerning Policies for RDI in Housing

A preliminary audit of City of Vancouver Policies identified a few instances of potentially concerning policies from the existing 2011 Comprehensive Plan and Development Code.

Table 2: Potentially concerning policies identified in the [2011 Comprehensive Plan](#)

Policy	Language	Comment
H-4 Neighborhood Character	Encourage innovative housing policies that provide for affordable housing and maintain neighborhood character.	Maintain neighborhood character largely means SFR character in Vancouver as the predominant housing type.
CD-3 Infill and Redevelopment	Where compatible with surrounding uses, efficiently use urban land by facilitating infill of undeveloped properties, and redevelopment of	Compatibility with surrounding uses (largely SFR) could mean that the neighborhood is unable to redevelop with increased density. The policy

	underutilized and developed properties. Allow for conversion of single to multi-family housing, where designed to be compatible with surrounding uses.	could better define compatibility as scale or design and/or which neighborhoods this applies to.
CD-9 Compatible Uses	Compatible uses Facilitate development that minimizes adverse impacts to adjacent areas, particularly neighborhoods.	Creating a cohesive, compatible neighborhood is good, but most of the time this means new development must be tailored to suit SFR instead of the neighborhood adapting to higher density.
Land Use Designation (Zoning) Map	The land-use map directs a majority of the city area to be exclusively zoned as SFR, which until recently only allowed one structure per parcel.	Restricting a majority of the city to this land-use type has established a precedent of sprawl, housing unaffordability, and exclusion for socially vulnerable groups including BIPOC.

Table 3: Potentially concerning policies identified in the [Development Code](#) "Title 20"

Code Element	Language	Comment
20.110.010 – Administration – Intent and Purpose	B.5 "preserving the character of existing neighborhoods"	"Preserving the character of existing neighborhoods" can be coded nimby-ism
	B.1 "effectively meet citizens' needs"	"Citizens" can be exclusive to varied immigration statuses. i.e. If you're not a citizen the city isn't designed for you
20.265.010 – Design Review – Purpose	A. 1 "Preserve the character and quality of the City's cultural, historic, and architectural heritage"	Vancouver's cultural heritage almost entirely based on white culture and history and doesn't reflect its present diversifying residents
20.420.050 – Mixed Use Standards and District – Development Standards	A. "create safe, attractive and convenient environment." <i>Note: There are many other chapters where "attractive" occurs, this one serves in place of listing all occurrences</i>	"Attractive" is subjective, and can lead to continuing existing design standards and styles that lend themselves to historic SFR (which are less attainable for BIPOC communities)
20.515.010 – Hough Neighborhood Overlay District – Purpose	"Maintaining the residential character of the neighborhood, which is primarily zoned for low-density residential development (R-9)"	We need to examine if protecting the character of SFR is an important goal. Can be used to exclude other home types and density (which are more often attainable for BIPOC communities)
20.810.010 – ADU – Purpose	"Does not cause unanticipated impacts on the character or stability of single-family neighborhoods"	This language implies that ADU's are likely to cause these kinds of negative impacts to SFR
20.920.060 – Tier 2 Infill Standards	G.1 "ensure compatibility of infill development with the character of existing residential structures."	Compatibility with existing residential structures (especially SFR) can perpetuate lower-scale development and contribute to less opportunity for housing attainable to less affluent and BIPOC communities
	"To encourage new infill development that complements the existing	Similarly, complimenting the existing often SFR neighborhood can lead to

	neighborhood character"	more of the same with less opportunities for BIPOC groups
--	-------------------------	---

There is a common thread between the potential to cause RDI and low-density housing (Single Family Residential) due to historic and present inequities in BIPOC communities' ability to afford a single family detached home. Continuing to zone for and produce only low density housing or requiring that new or infill developments match the standards set by historic single-family neighborhoods perpetuates inaccessibility for affordable housing and homeownership for BIPOC communities and any downstream impacts those cause.

3. Policies to Mitigate for RDI

Include policies to address these (RDI) impacts, or that address development of more affordable housing, preservation of existing affordable housing, and protection of existing housing

Equity Driven City-wide Policies

Not only does HB 1220 require reviewing the city's existing policies, but it asks cities to examine what new policies it can put in place to undo racially disparate impacts, displacement and exclusion associated with past policies. Broadly these policies are any that preserve and promote housing affordability, retain the existing community, support the local economy, and include community voices in planning.

Example policies and their categories:

- **preservation of historical and cultural communities**
 - Identifying neighborhoods at a higher risk of displacement then establish protective policies such as right to return, affordable housing requirements in new developments,
 - Promoting art celebrating cultural groups by artists from those groups
- **investments in low, very low, extremely low, and moderate-income “affordable” housing**
 - providing incentives for developments to maintain a number of housing units at a rate affordable to low-income households
 - Supporting the creation of a community land trust to purchase and manage properties at affordable rates
- **inclusionary zoning**
 - Removing zoning designations that require single family residential (SFR), and instead encouraging “middle housing including SF attached, ADU, Cluster Villages, etc.
- **community planning requirements**
 - Including underrepresented and underserved communities at all stages in planning efforts in a leadership capacity
- **tenant protections**
 - eviction protections;
 - notice of land-sale; and
 - right of first purchase
- **land disposition policies;**
 - right to return
 - right of first refusal
- **consideration of land that may be used for affordable housing.**

- Including policies that require or encourage affordable housing especially in areas that support active transportation and connected neighborhoods (TOD, Mixed Use Neighborhoods)

There are a few more policy categories that lead to reductions in RDI including:

- **Community-led and community-owned housing and development including stewardship and land and home ownership.**
 - Limited Equity Cooperative (MFR and MHP Cooperatives)
 - Community Land Trust
 - Live-work land-use
- **Strategies to increase equitable access to opportunity and generational and community wealth building.**
 - Down-payment assistance
 - Community Investment Trust

The City should further examine policies within these categories that are specific to the local and historic context and encourage community participation in identifying what policies they value.

Community Engagement

Community engagement and representation are crucial to all parts of city planning, and the RDI analysis is no different. While there was no direct mention to community engagement in HB 1220, the Washington Department of Commerce emphasizes how important involving community voices are in this process. It asks that the RDI Analysis include opportunities throughout for the process to hear and include the community's concerns including determining past and present inequities, measurement criteria, and policies they consider to be harmful. Following the RDI analysis, results should be presented to community representatives to determine any missed areas of concern.

The City of Vancouver should provide opportunities for racial minority communities to comment on historic and present RDI, displacement, and exclusion in housing, and to identify existing policy changes and new policies to remove or reduce RDI, displacement, and exclusion in housing. This can be done through targeted workshops, and focus sessions with equity and racial equity and community focused advocacy groups such as:

- City of Vancouver Equity Working Group
- School Affinity Groups
- CBO Working Group

4. Identify Displacement Risk

Discussion and/or map of areas that may be at risk of displacement.

Equity Index & Displacement Risk Assessment Tools

The City of Vancouver has published an [online mapping application](#) that shows areas across the city categorized based on their equity and displacement index scores. These scores were created in 2022, based on the methodology used in the City of Portland’s 2018 Gentrification and Displacement Neighborhood Typology Assessment and Dr. Lisa Bates’ previous work at the University of Portland. The equity index compiles a weighted set of demographic factors including race/ethnicity, age, income, housing, education, English proficiency, and disability. These same indicators were then used alongside Regional Multiple Listing System (RMLS) home value data, from 2000-2020 and 2015-2020.

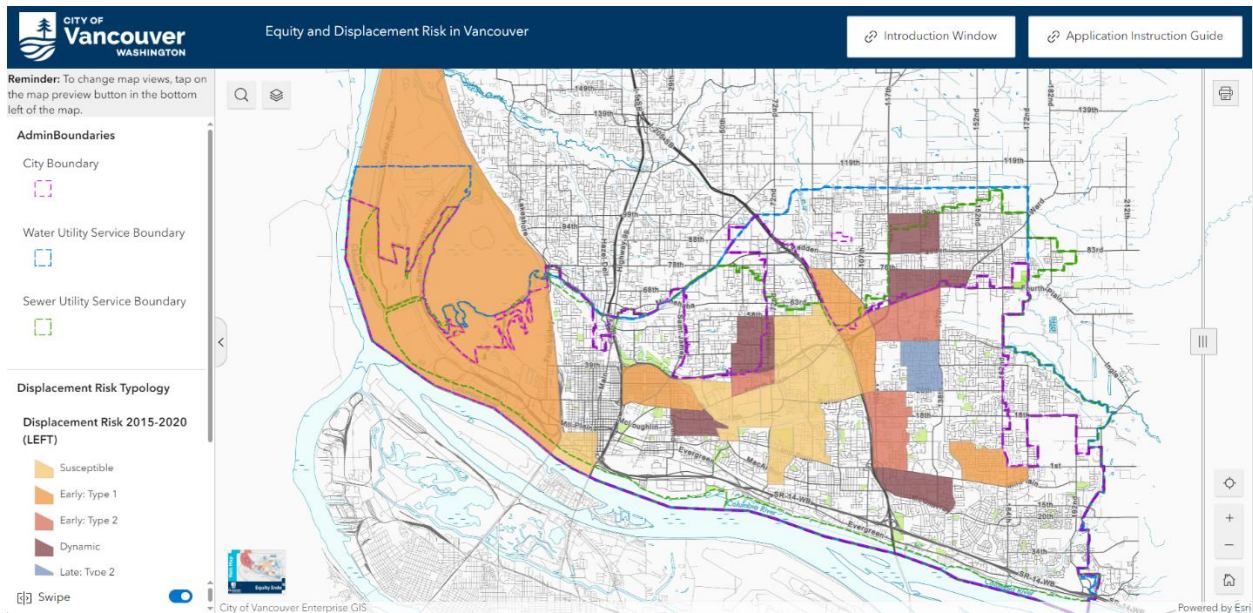
Table 3. Displacement Risk Categories

Typology	Vulnerable population?	Demographic change?	Housing market condition
Susceptible	Yes	No	Adjacent
Early: Type 1	Yes	No	Accelerating
Early: Type 2	Yes	Yes	Adjacent
Dynamic	Yes	Yes	Accelerating
Late: Type 1	Yes	Yes	Appreciating
Late: Type 2	Used to be in 2000	Yes	Accelerating
Continued loss	Used to be in 2000	Increasing share of white people and adults with four-year degree	Appreciating

Source: Displacement Risk Methodology, City of Vancouver, 2022

Vulnerable population includes social vulnerability indicators including median household income, race, housing tenure (renter/owner), educational attainment, and low-income. Demographic change examines if the census tract has become less racially diverse during the time examined, this separates early (may see displacement in the future) from late (has already experienced displacement) typologies. Lastly, housing market conditions examines if the census tract or an adjacent census tract is experiencing significant housing value changes.

This kind of analysis is very important because it not only identifies where displacement has been occurring but where it may be expected in the future. Using this map as reference can inform where new development could have a higher likelihood of causing displacement, indicating where development should be avoided, or more likely, where targeted displacement policies and careful review and planning are necessary.



Source: Equity and Displacement Risk Application

The analysis identified several census tracts just east of I-205, Andresen, and Hudson Bay neighborhoods as already experiencing demographic changes (displacement). Several other areas including fruit valley, downtown, and along fourth plain are in the early stages of displacement (at risk).

5. Tailoring RDI Mitigation to the Most Impacted Neighborhoods

Key Takeaways:

RDI Priority Communities

Tier 1:

1. Fourth Plain
2. Fruit Valley
3. North Cascade Park (East Mill Plain)

Tier 2:

4. Rose Village
5. Central Vancouver Heights

Introduction

Blanket equity policies across the city will always be less effective than policies specific to the neighborhoods most in need. Therefore, establishing a set of neighborhoods most impacted by racial inequities can be especially useful. For RDI, those targeted neighborhoods should be those with larger populations of BIPOC and those who score poorly based on these measures.

The following chapter works to address RDI on a neighborhood specific basis.

1. Review of RDI and BIPOC population spatially to see trends in location.
2. Determining the neighborhoods with higher RDI concern.
3. Identifying policies that mitigate and undo the RDI felt in those neighborhoods.

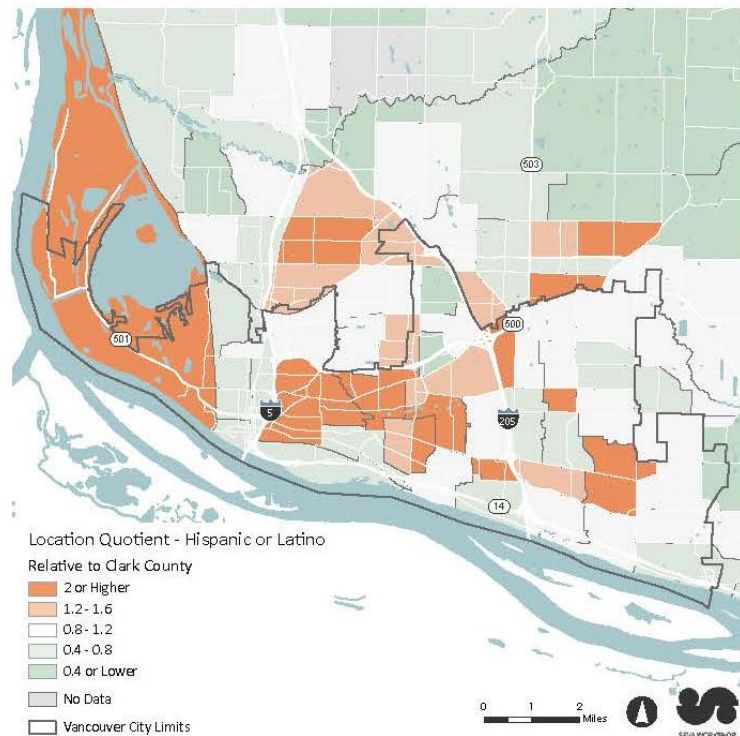
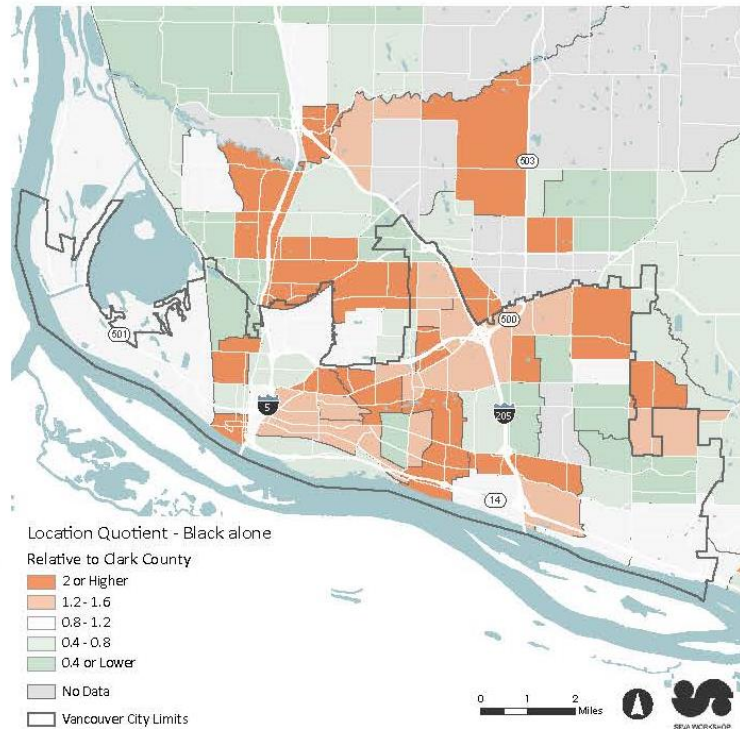
Identifying RDI Priority Communities

BIPOC Population

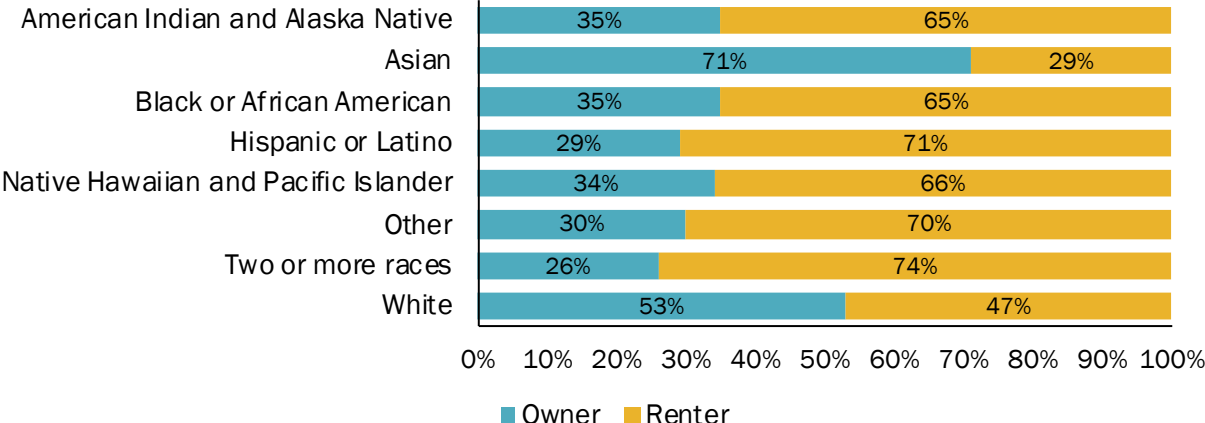
People of color are more likely to live within City of Vancouver boundaries than in other parts of Clark County. The Equity Analysis identifies the three neighborhoods across the city with the highest BIPOC population to be Fruit Valley, Fourth Plain, and East Mill Plain. However, these pockets differ by race and ethnicity within POC.

The following maps show the distribution of race across the city and surrounding Clark County, created as part of the Equity Analysis. Planning efforts to address RDI should focus on where policies would mitigate inequalities for a significant number of BIPOC. Based on Vancouver's racial demographics, the areas of focus should be the census tracts with over 2% of the population in ethical groups other than white. As such, these identified areas include Fourth Plain, Fruit Valley, and North Cascade Park.

Image Source: City of Vancouver, Equity Analysis 2024



Although the Asian population is a racial minority included in BIPOC, it is not of particular concern for RDI, at least in Vancouver. For example, Asian populations in Vancouver have higher incomes, higher educational attainments, and higher homeownership rates than any other racial group, including Whites. The chart below finds the difference in homeownership rates by race, as presented in the Housing Needs Assessment.



Household Tenure by Race and Ethnicity, Vancouver, 2021 (From HNA)
 Source: SEVA, ACS 5-Year Estimates, 2017-2021

Priority Community Rationale

Based on BIPOC population distribution results (2% or higher for Black and Latino) and a review of RDI concerns described in the RDI Spatial Data Appendix the following RDI Priority Communities are identified. Tier 1 priority communities had poor scores for all the RDI indices while Tier 2 scored poorly for only a subset (3 or more indices).

Socioeconomic Vulnerability Indicators:

High BIPOC Population (over 2% BIPOC share of population)

- High or Highest Equity Index Score
- Displacement Risk Index Geographies
- Higher Rates of Poverty (13.5 – 36.8%)
- High Rates of Cost Burden by Housing (> 30% Median Rent/Median HH Income)
- Low Median Household Incomes (< \$70,000)
- Low Educational Attainment (<25% of 25-years-old or older population with a Bachelors Degree or Higher)

RDI Priority Communities

Tier 1:

1. Fourth Plain
2. Fruit Valley
3. North Cascade Park

Tier 2:

4. Rose Village
5. Central Vancouver Heights & Northwood

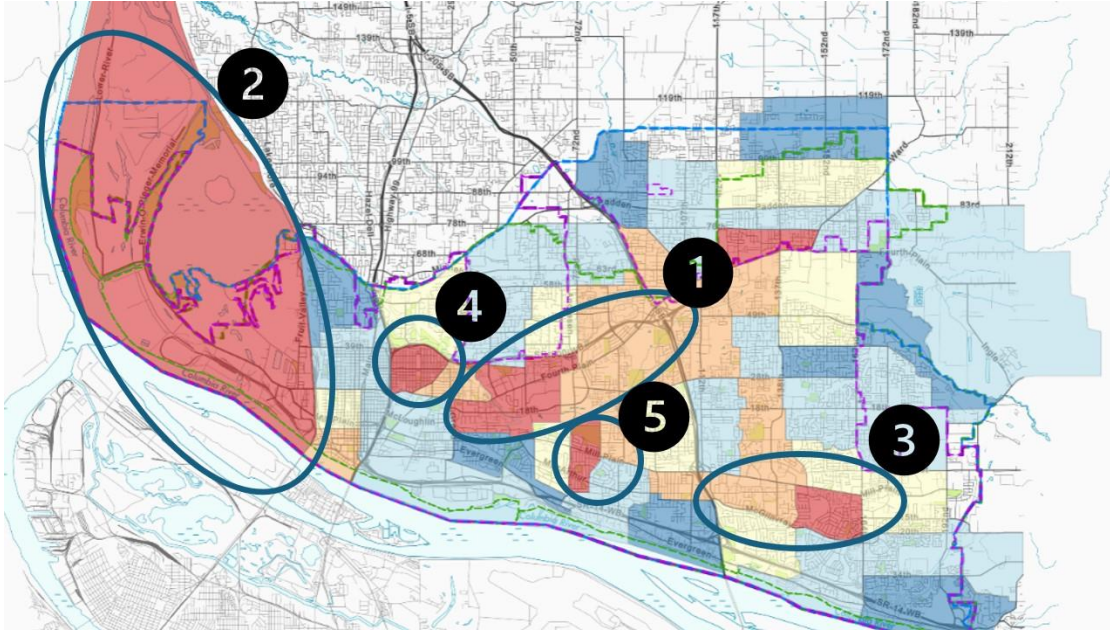


Image: Map shows RDI Priority Communities overlaid on the Equity Index Map, where Red indicates highest measures of inequity and blue for lowest measures of inequity

Fourth Plain

Fourth Plain was developed through the Vancouver Housing Authority during WWII to house the incoming wartime workforce employed in the Kaiser shipyard. Although most of the thousands of black emigrants left the neighborhood following the war's end the neighborhood retained its character as a multicultural community. The Fourth Plain Neighborhood is spatially defined by the area surrounding Fourth Plain Corridor between I-5 and I-205, although subareas have been defined through the Fourth Plain for All (eastern), and Fourth Plain Forward (western). Both have high BIPOC percentages and experience similar concerns particularly low incomes, and low rates of homeownership (see Appendix). In addition, Fourth Plain was identified to have higher displacement risk than other areas of the city – a very critical concern for BIPOC residents.

We are likely to see the Fourth Plain neighborhood densify in the future, supported through the Comprehensive Plan. Much of the corridor will become either Mixed Use or Regional Activity and see significant growth and development. As such, policy should work to mitigate any RDI and any displacement pressures that could result from the new developments.

Targeted Policies:

- ❖ Community Investment Trusts – Work with Mercy Corps or another NPO to facilitate community buy-in for a CIT; a program that allows community members to invest in participating local small businesses a minimum of \$10 per month and receive a dividend of profits. (Reside Vancouver)
 - *Why?* One of Fourth Plain's biggest strengths is its local economy, particularly its small businesses. These employ and are operated by neighborhood residents and cycle money back into the local economy. Supporting these small businesses supports that local economy and builds pride and stewardship.
- ❖ Down Payment Assistance Loan – Create a program that provides loans for qualified low-income households (in certain neighborhoods) with low-interest rates (and loan forgiveness for long-term tenure).
 - *Why?* Fourth Plain has very low rates of owner-occupied housing, with census tracts scoring as low as 4.2% (ACS 2022, Tract ID 411.11) and all within the lowest quintile for the county (36.9%). Homeownership allows for local wealth generation, improved housing security, and often improved affordability.
- ❖ Ensuring a Variety of Housing Types - Encourage new and innovative housing types that meet the evolving needs of our households and expand housing choices in all neighborhoods. These include: SFR; MFR; Middle housing; ADU; pre-fabricated homes such as manufactured, modular, and mobile homes; co-housing; and clustered housing/clustered services.
 - *Why?* Allowing for and encouraging the development of a breadth of housing types for all kinds of households, including multi-generational; and increasing opportunities for smaller, denser, and more affordable housing options.
- ❖ Affordable Housing Replacement – Redevelopment projects are required to, at a minimum, match the number of housing units lost with units maintained at an affordable level.

- *Why?* This neighborhood is likely to experience a great deal of redevelopment that may displace households. By ensuring that no affordable rate housing is lost helps prevent displacement and gentrification.
- ❖ Relocation Assistance (Right to Return) – When relocation is unavoidable determine who is the most likely harmed community and ensure that community is protected from further displacement. Support relocation assistance including the development of replacement housing and prioritize displaced households for new housing.
 - *Why?* All the Fourth Plain Area appears on the Displacement Risk Index within the categories of Susceptible, Early: Type 2, and Dynamic. These categories indicate that it is at risk for or presently ongoing displacement.
- ❖ Mixed Use TOD – Encouraging Mixed-Use Development along transit corridors to encourage connected and accessible neighborhood design housing, employment, and amenities within easy access to transit.
 - *Why?* Fourth Plain Neighborhood is already well supported through public transit; Fourth Plain Blvd is a key transit corridor for BRT and standard bus routes. By directing mixed-use development along transit creates a community that is connected, accessible, and car optional.
- ❖ Density in Multimodal Areas – Direct high-density development to areas with existing development where the terrain is conducive to walking, bicycling and transit use and where sensitive drainage basins will not be impacted.
 - *Why?* Fourth Plain already represents a neighborhood well suited for walking, biking, and public transit with a variety of land uses and amenities. Promoting density in those areas promotes connectivity, accessibility, and healthy.
- ❖ Development Code for Air Quality – Recognizing that locating density and affordable housing along major transportation corridors incurs air quality health impacts; development code will be updated to conform to best practices for indoor air quality.
 - *Why?* Transportation corridors are well suited for densifying and affordable housing due improved connectivity and accessibility. Locating affordable housing along these transportation corridors can put socioeconomically vulnerable communities including racial groups at higher exposures to poor air quality.

Fruit Valley

The Fruit Valley Neighborhood is on the Western Edge of Vancouver and is characterized presently by a mixture of uses including Industrial, Agricultural, Residential, and Open Space. As its name suggests it was historically valued for prosperous fruit and nut orchards. Presently, however, it has become dominated by larger industrial operations including the Port of Vancouver or preserved as Open Space (Vancouver Lake). Its relatively small population of 2,732 has remained working class dominated, and increasingly Hispanic/Latino at 32% (2022 ACS Census).

The Fruit Valley Neighborhood is not likely to experience significant growth pressures, as it is relatively disconnected from the rest of the city and proximity to industrial land uses. This reduces displacement risk from redevelopment, but present RDI's should be mitigated for.

Targeted Policies:

- ❖ Affordable Housing – Retaining existing affordable housing by utilizing deed restrictions and density bonuses to incentivize and secure housing affordability and provide new homeownership opportunities for residents with low incomes.
 - *Why?* Fruit Valley presently has relatively affordable housing (median rent \$914, median owner-occupied cost \$1,322). (ACS 2022) Keeping the neighborhood's affordable housing help prevent displacement and RDI pressures.
- ❖ Limited Equity Cooperative – MFR and MHP can transition into a cooperative ownership structure where residents own shares of the community. Rents are restricted to affordable rates, and profits distributed among residents/shareholders. Example communities: Lakeside Mobile Estates, Fruit Valley Condos, Plum Meadows, and Fruit Valley Commons
 - *Why?* A limited equity cooperative would lock-in these communities as stable housing resistant to redevelopment, affordable, and returning profits to the residents as passive income. All of which would help bring down Fruit Valley's very high Cost-burden Ratio (Median Rent/Median HH Income) of 38.2.
- ❖ Streetscape Improvements for Developers – Require developers to make improvements to their street frontage or pay fees supporting toward local streetscape improvements in the neighborhood.
 - *Why?* The Fruit Valley Neighborhood scores poorly for walkability/bike-ability/public transit. Secondly, streetscape design can improve safety, and lead to future investment in this neighborhood.



Image shows Walkscores in Fruit Valley Neighborhood/ Walkscore: 18, Transit Score 27, Bike Score 53. Source: [Walkscore](https://www.walkscore.com/)

- ❖ Public Transit Improvements – City should budget for improvements and new public transit routes in Fruit Valley.
 - *Why?* Fruit Valley scores very low (27) for transit access, according to Walkscore due to its limited transit service. Fruit Valley only has one bus route (Route 6) at a 30-minute service frequency along its border with Downtown.

North Cascade Park

Mill Plain is Vancouver's other primary east-west arterial, and historically presenting the connection between the fort and lumber and grist mills upriver. Mill Plain in Central Vancouver is categorized by low density residential and institutional land use while east of I-205 transitions into more commercial and high density residential. This eastern segment is of higher equity and RDI concern, particularly the Cascade Park neighborhoods, census tracts 413.22 and 413.23. These have higher rates of BIPOC population alongside RDI concerns like housing cost-burden

(between .30 and .362), high rates of poverty, low median household income, and low homeownership rates (see Appendix).

The comprehensive plan will likely see this neighborhood experiencing a densification, with some properties redeveloping into much larger scale mixed use and multi-family housing. Crucially census tracts in this neighborhood were categorized as dynamic on the Displacement Risk Map, indicating they are actively ongoing displacement; with increasing home values and a decreasing BIPOC population. As redevelopment occurs, policy needs to ensure that housing remains affordable, and residents are not displaced.

Targeted Policies:

- ❖ Community Land Trust – Facilitate the creation of a Community Land Trust; a NPO to purchase and resell properties providing affordable housing to buyers who agree to retain as affordable housing or first-time home buyers as their primary residence at an affordable cost. (Reside Vancouver)
 - *Why?* This policy would allow the CLT to purchase the property and sell to developers who make some agreements to keep the created housing affordable.
- ❖ Right of First Refusal – When a property is listed for sale, provide opportunity for the tenant (if applicable) and Community Land Trust (if applicable) to purchase at market rate before the property is listed on the open market or sold private party. (Reside Vancouver)
 - *Why?* This policy would support the CLT and its ability to function, promoting affordability; and providing the opportunity for the tenant to remain in-place.
- ❖ Relocation Assistance (Right to Return) – When relocation is unavoidable determine who is the most likely harmed community and ensure that community is protected from further displacement. Support relocation assistance including the development of replacement housing and prioritize displaced households for new housing.
 - *Why?* North Cascade Park was categorized as Dynamic according to the Displacement Risk Analysis. This means that the area has a socially vulnerable population, has increasing home values, and has seen a shift toward less BIPOC population in the last few years. Displacement is ongoing; therefore this kind of policy can help keep socioeconomically vulnerable and BIPOC residents, within the neighborhood.
- ❖ Affordable Housing Replacement – Require developers to provide affordable housing for the number of housing units lost through the development.
 - *Why?* The neighborhood has relatively low household incomes and are cost-burdened by housing (>30%). Developing housing set to an affordable level will mitigate for high housing costs compared to income.
- ❖ Neighborhood Livability – Maintain and facilitate development of stable, multi-use neighborhoods that contain a compatible mix of housing, jobs, stores, and open and public spaces in a well-planned, safe pedestrian environment.
 - *Why?* Mixing land use, housing, and amenities help create a connected and accessible community, well suited for North Cascade Park’s high development potential.

Central Vancouver Heights & Northwood

The Vancouver Heights is a historic neighborhood in the city's core, it was developed through the Vancouver Housing Authority providing homes for wartime workers, then redeveloped after the war's end as single family residential neighborhoods. Neighborhoods created during the after war redevelopment were modest, relatively affordable, on smaller lots, and attracted predominantly white working-class residents. It remains single family residential, with much of the original housing stock remaining.

Vancouver Heights falls into three census tracts separated by Andresen, and again by North Garrison Rd/Morrison Rd. Each census tract performs very differently to one another on racial distribution and RDI measurements. Of the three only the middle- Tract 430, presents a concern for RDI. The central neighborhood is more racially diverse, is more cost-burdened by housing at .307, and broadly performs worse for RDI measurements. Importantly, this neighborhood, as discussed in the following chapter was surrounded by neighborhoods like East and West Vancouver Heights and Father Blanchet Park that utilized racially restrictive covenants during the 30s-50s, leading to this as the only neighborhood in the area, allowing BIPOC residents to buy.

- *Note: The Vancouver Heights District, located in the Westernmost edge of Vancouver Heights is undergoing a planned redevelopment project, focused on improving housing affordability and creating a mixed-use neighborhood center.*

Targeted Policies:

- ❖ Down Payment Assistance Loan – Create a program that provides loans for qualified low-income households (in certain neighborhoods) with low-interest rates (and loan forgiveness for long-term tenure).
 - *Why?* This creates opportunities for eligible socially vulnerable households including BIPOC to better buy a home without being cost-burdened.
- ❖ Ensuring a Variety of Housing Types - Encourage new and innovative housing types that meet the evolving needs of our households and expand housing choices in all neighborhoods. These include: SFR; MFR; Middle housing; ADU; pre-fabricated homes such as manufactured, modular, and mobile homes; co-housing; and clustered housing/clustered services.
 - *Why?* Presently the neighborhood is almost entirely single family residential, attracting only those who can afford to pay for those associated higher housing costs and utilize all the space SFR provides. By diversifying the kinds of housing available in this neighborhood diversifies its residents, allows for generational housing, and affordability.

Rose Village

The Rose Village neighborhood is defined by the areas bounded by I-5, SR-500 and St Johns. Its close proximity to downtown, the oldest part of the city, meant that Rose Village was one of the first places to develop, along with Forth Plain the neighborhood experienced the levels of development of housing for wartime industries.

Today, the neighborhood is home to many older residents who have lived here for decades, as well as first time buyers who appreciate the quality craftsmanship of an older home, the affordability of a smaller lot and structure, and the proximity to downtown and I-5. Overtime, zoning changes have allowed the neighborhood to develop duplexes and apartments along Fourth Plain and St Johns corridors. It is racially diverse with 32% BIPOC excluding Asian, lower median household income and Highest Equity Risk and Early: Type 1 Displacement Risk.

Targeted Policies:

- ❖ Community Land Trust – Facilitate the creation of a Community Land Trust; a NPO to purchase and resell properties providing affordable housing to buyers who agree to retain as affordable housing or first-time home buyers as their primary residence at an affordable cost.
 - *Why?* Due to the neighborhoods displacement risk score, Early: Type 1, policies should work to ensure that any redevelopment pressures prioritize the existing residents
- ❖ Right of First Refusal – When a property is listed for sale, provide opportunity for the tenant (if applicable) and Community Land Trust (if applicable) to purchase at market rate before the property is listed on the open market or sold private party.
 - *Why?* This policy would support the CLT and its ability to function, promoting affordability; and providing the opportunity for the tenant to remain in-place.
- ❖ Multi-generational Housing – Encourage multi-generational housing through density increases and design culturally tailored to multi-generational households including, single-story (no-steps) design, flexible floorplans, ADU, and connected and accessible community guidelines.
 - *Why?* To better encourage a mixing in household types including variety of ages policies should facilitate housing styles that allow for aging in place, and all stages of life.

6. De-Segregating White Dominant Neighborhoods

Historic Precedents

These present racial disparities and racial distribution are influenced by historic racial housing inequities. BIPOC groups were excluded from buying housing in Vancouver directly through racial deed restrictions (CCRs), and indirectly through a lack of access to mortgage assistance offered through the Veterans Affairs (VA). The strongest indicators of racist housing policy leading to geographic disparities are from historic deed restrictions.

Presently, decades after racist housing policy were in-place in Vancouver, there are still patterns of racial segregation that line-up with racist housing policy geographically. Thankfully, unlike its larger neighbors, Seattle and Portland with a history of Redlining, Vancouver's only significant spatially disparate racial housing policy is Racial Covenants, Conditions, and Restrictions (CCRs).

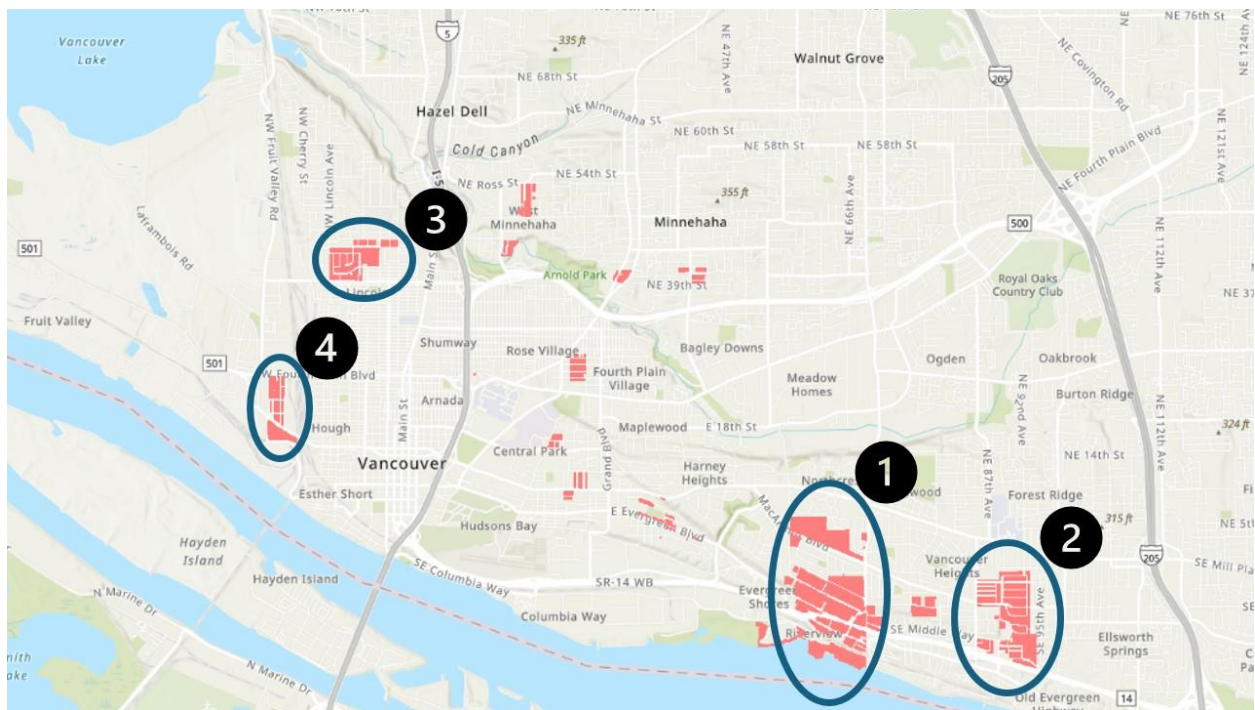


Image: Parcels with CCR's within Clark County identified through Racial Restrictive Covenants Project grouped into 4 categories. Source: Washington State, [University of Washington](#)

As previously discussed in Chapter 1: Data and Historic Precedent Indicating RDI, racially restrictive deeds, were legally binding rules restricting the sale of properties to only white or “non-colored” individuals and households, prevalent during the 1930-50s. Properties within Clark County that were subject to racial CCR's are shown in the above map image, most of which fall within City Boundaries. There are clear geographic trends resulting from large subdivisions with racial restrictions. Four neighborhoods across the city were identified to have a large number of parcels with a history of racial CCRs.

Racial Integration Neighborhoods

1. Evergreen Highlands & Northcrest (Tract 429)
2. Eastern Vancouver Heights (Tract 431)
3. Southern Lincoln (Tract 420)
4. Simpson Ave – Southeastern Fruit Valley (Tract 410.05) – Excluded

Racial segregation caused by racial CCR's has lasting impacts on race/ethnicity demographic distribution across the city. For instance, Evergreen Highlands Neighborhood and Eastern Vancouver Heights in the city's south-central area. Census Tracts in these neighborhoods have very low BIPOC (excluding Asian) population share at around 12 and 13%, much lower than the county average of 20%. The Simpson Avenue neighborhood presents an exception as the neighborhood has a high share of Hispanic/Latino residents at 21%, as such it is excluded for further consideration for integration policy.

These neighborhoods generally score well on RDI and equity matrices, as demonstrated by mapping results shown in the Spatial Data Appendix. A summary of those results are as follows:

- ❖ Equity Index
 - All CCR neighborhoods had a **Low and Lowest Equity Index** score
- ❖ Displacement Risk
 - All CCR neighborhoods had a **low displacement risk** (didn't appear on Displacement Risk Index)
- ❖ Homeownership
 - All CCR neighborhoods have a **high 67-84% homeownership rate**
- ❖ Cost Burden (Housing Cost/Household Income)
 - The neighborhoods have a 25-30 ratio, which is **moderate cost-burden ratio** below the cost-burden threshold of 30
- ❖ Poverty
 - CCR Neighborhoods poverty ratios varied widely from **8.6 - 13.5% in Eastern Vancouver Heights, to Southern Lincoln at 13.5-20%***
**Likely due to a proximity to downtown, which all score similarly*
- ❖ Median Household Income
 - CCR neighborhoods have **moderate median household income** ranging from \$93,000 - 113,000, similar to the County's median of \$97,700
- ❖ Education
 - CCR neighborhoods have **moderate-high educational attainment** of 34-43% of the population 25 and older receiving a bachelor's degree or higher

In general these CCR neighborhoods perform average to above average according to these indices. They have strong homeownership rates and educational attainment and score well in the equity index and displacement risk indices. However, these neighborhoods still have housing security concerns with lower incomes and in some instances poverty, both of which tie into having a moderate-high housing cost burden. Certain policies supporting these concerns can help these neighborhoods reduce historic impacts for housing segregation.

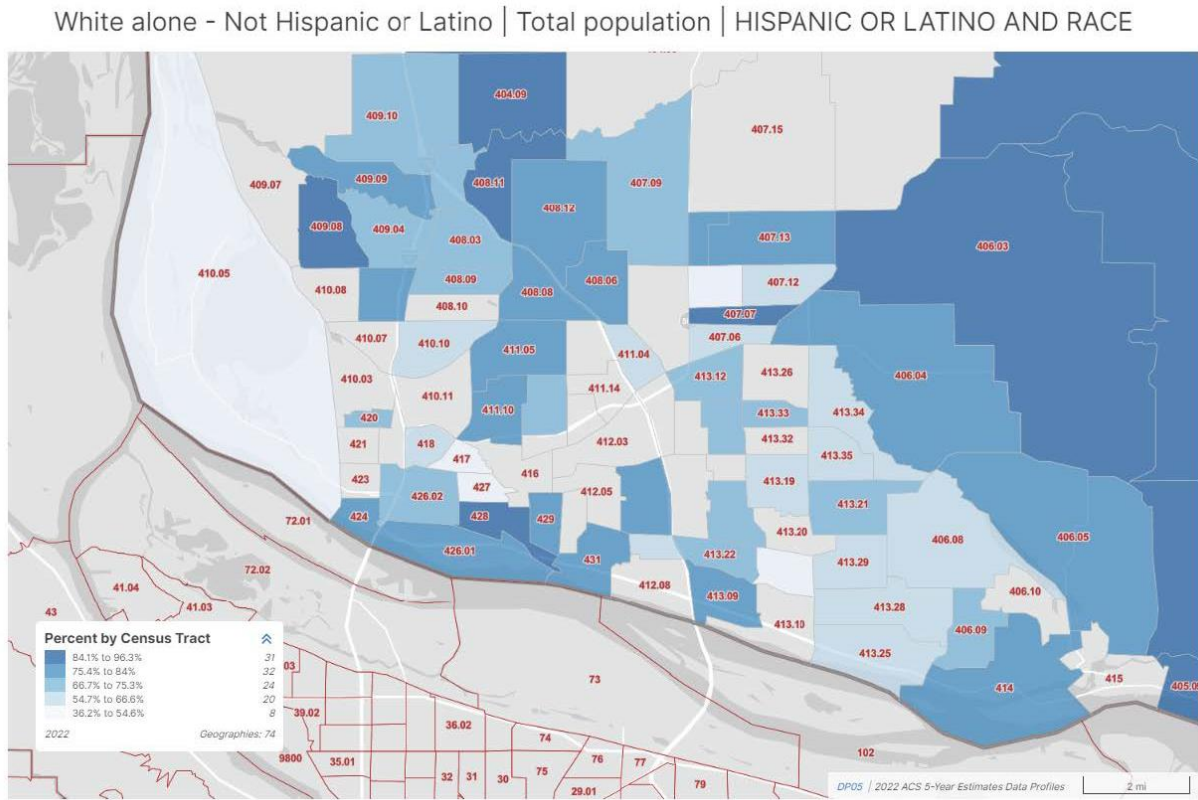
Policies that can be effective at addressing these formerly racial CCR neighborhoods include many of the common policies used to improve housing affordability, choice, and land-use mixing and cohesion. These include:

- 1) **Housing Affordability** - requires or incentivizes developers to include affordable housing units within new market-rate housing developments.
- 2) **Housing Vouchers** - enable low-income families to move into higher-opportunity neighborhoods, breaking up concentrations of racial and economic segregation.
- 3) **Flexibility in Housing Type** - support the creation of a variety of housing types, with specific focus on increasing density, and providing for “missing middle housing” such as townhomes, duplex, triplex, etc., village clusters, and others.
- 4) **Land Use Mixing** - through multiple small zoning districts or mixed-use zoning can a neighborhood that is more connected and accessible and provides opportunities for employment.

Spatial Data Appendix

Non-Hispanic/Latino White as Percent of Population

This map shows census tracts across Vancouver based on the share of the population that is White and Not Hispanic/Latino. Examining where the percentages are low shows the areas that are less racially diverse or have a larger BIPOC share of the population.

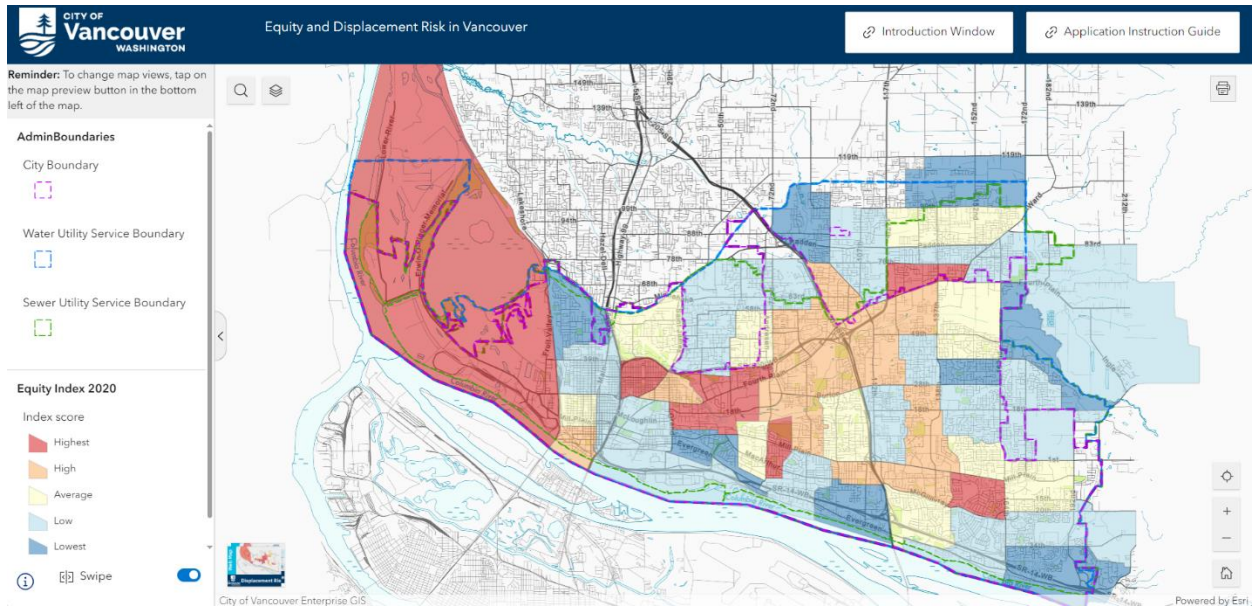


Source: US Census, 5-year ACS, DP05 – Hispanic or Latino and Race

The stand-out areas for having a high BIPOC population includes Fruit Valley, North Main, Fruit Valley, Fourth Plain Corridor, Central Vancouver Heights, East Cascade Park, and other areas. Although this may doesn't pull out specific racial groups, data indicates that East Vancouver has more Asian population, a BIPOC group that according to RDI indicator data, doesn't experience negative impacts in the same way as other racial groups.

Equity Index

The City of Vancouver has prepared an equity index that identifies equity priority communities based on a set of standard social vulnerability/equity indicators from the ACS Census. These indicators included renter/owner rates, race/ethnicity, English proficiency, education, income, disability, and age. This analysis indexed these together and compared to all census block group in the city. Many of these variables are common RDI categories when paired with a BIPOC dominant community.

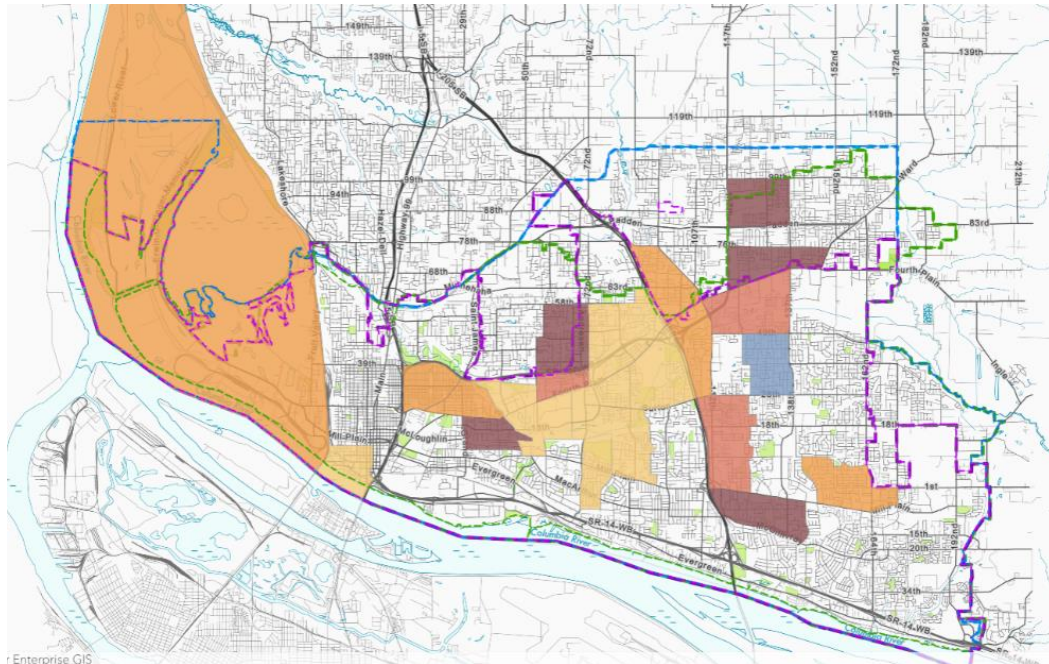


Source: Equity and Displacement Risk in Vancouver (Equity Index Map), City of Vancouver, 2024

The areas of the city in the highest index category according to the equity index are Fruit Valley, Rose Village, Harney Heights, and Cascade Highlands (East Mill Plain), and the whole Fourth Plain Corridor has equity index scores high or highest.

Displacement Risk Index

Alongside the Equity Index, the City prepared the Displacement Risk Index to identify which census tracts are at a higher risk or actively ongoing displacement. This was created through examining socioeconomic vulnerability, areas of increasing home values, and changing racial/ethnic compositions.



Enterprise GIS
 Source: *Displacement Risk Map (Equity and Displacement in Vancouver)*, City of Vancouver 2024

Table 4. Displacement Risk Categories

Typology	Vulnerable population?	Demographic change?	Housing market condition
Susceptible	Yes	No	Adjacent
Early: Type 1	Yes	No	Accelerating
Early: Type 2	Yes	Yes	Adjacent
Dynamic	Yes	Yes	Accelerating
Late: Type 1	Yes	Yes	Appreciating
Late: Type 2	Used to be in 2000	Yes	Accelerating
Continued loss	Used to be in 2000	Increasing share of white people and adults with four-year degree	Appreciating

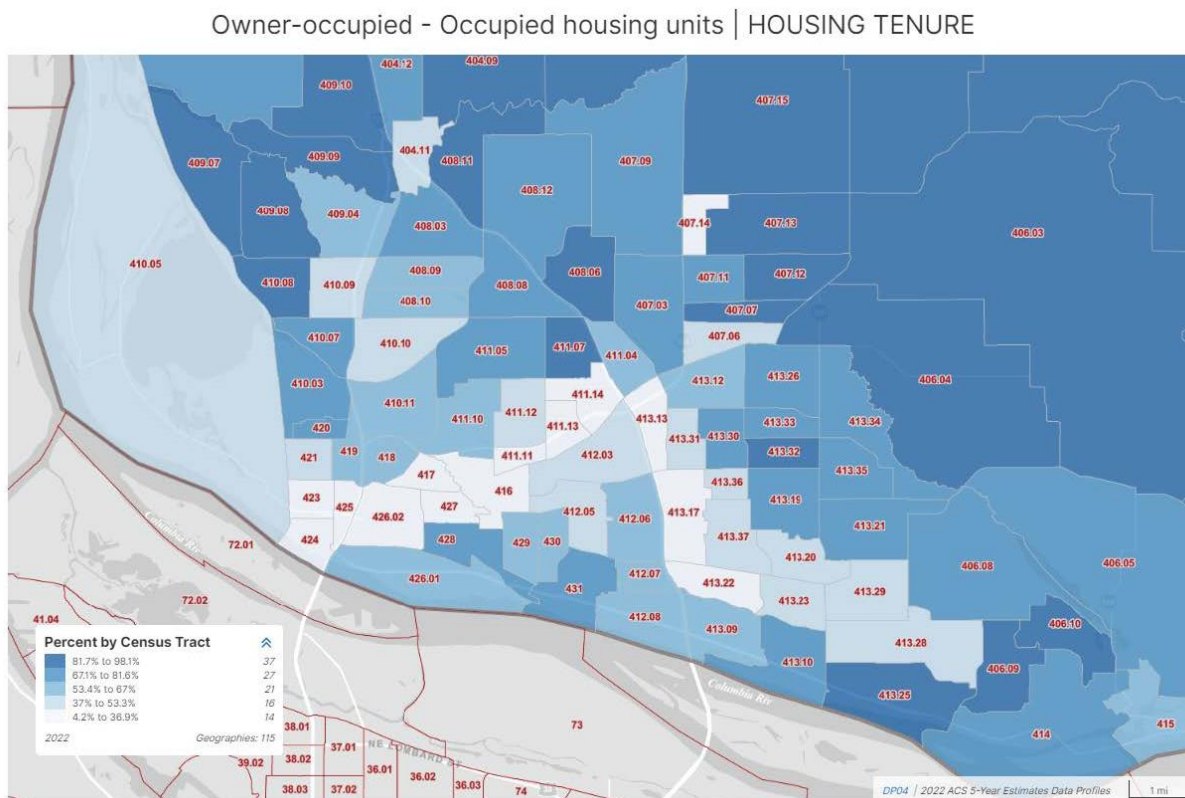
Source: Displacement Risk Methodology, City of Vancouver, 2022

There are a few key results from this analysis:

- Fruit Valley – Early: Type 2
- Fourth Plain (I-5 to 205)– Susceptible and Early: Type 1, Dynamic
- Fourth Plain (East of I-205): Early Type 1 or 2, Dynamic
- Mill Plain (East of I-205): Dynamic
- Hudson Bay: Dynamic
- North Andresen: Dynamic

Homeownership

One of the strongest observed differences between racial groups socioeconomic status' are their ability to own their housing. The Equity Analysis found that BIPOC (excluding Asian) city residents are more likely to rent instead of own their housing, with homeownership rates between 26-31%, compared to the city's average of 51%. ([EA](#))



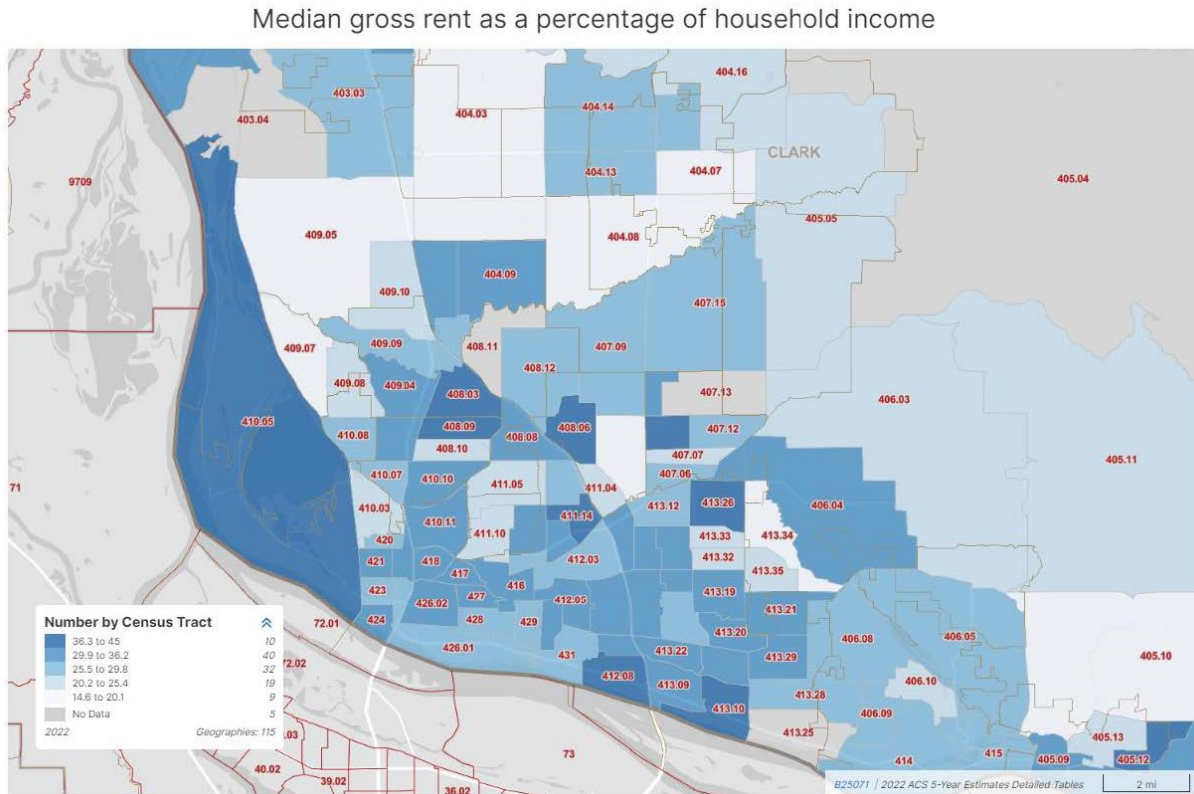
Source: US Census, 5-year ACS, DP04 – Owner-occupied housing, 2022

Spatially we see lower rates of homeownership along the Fourth Plain Corridor, East Mill Plain, Fruit Valley, and St John's Neighborhoods. There are also low rates of homeownership Downtown but those can be explained more by residents housing choice and land value and densities. This lack of homeownership observed is likely a result of present disparities in income and wealth, which in turn may be tied to differences in educational attainment and other factors examined in the Appendix.

Housing Cost Burden

One useful RDI consideration that captures components of both income and housing costs is Housing Cost Burden. Cost burdened by housing is defined as spending over 30% of the household income on housing. Households who are cost burdened by housing are more likely to experience displacement risk or housing insecurity.

On the following Census map the highest two categories both fall within that category (darkest two shades of blue).



Source: US Census, 5-year ACS, B25071 – Median Gross Rent as a Percentage of Household income, 2022

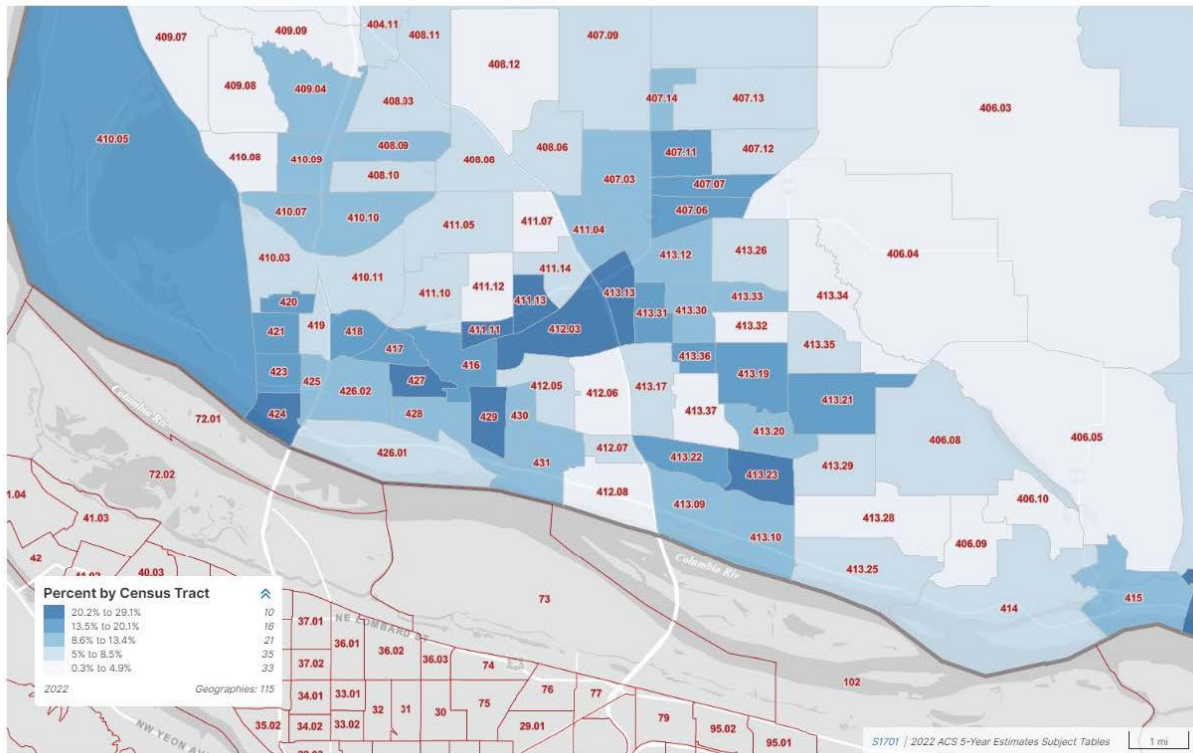
The spread of median gross rent as a percentage of household income is distributed relatively evenly across the city, however there are a few trends identified through this map.

Neighborhoods with the highest ratio of median rent to median household income include:

1. Fruit Valley
2. Along the East side of i-5 (West Minnehaha and Central Park neighborhood)
3. East Millplain and SR-14 neighborhoods

Poverty

Population for whom poverty status is determined - Percent below poverty level



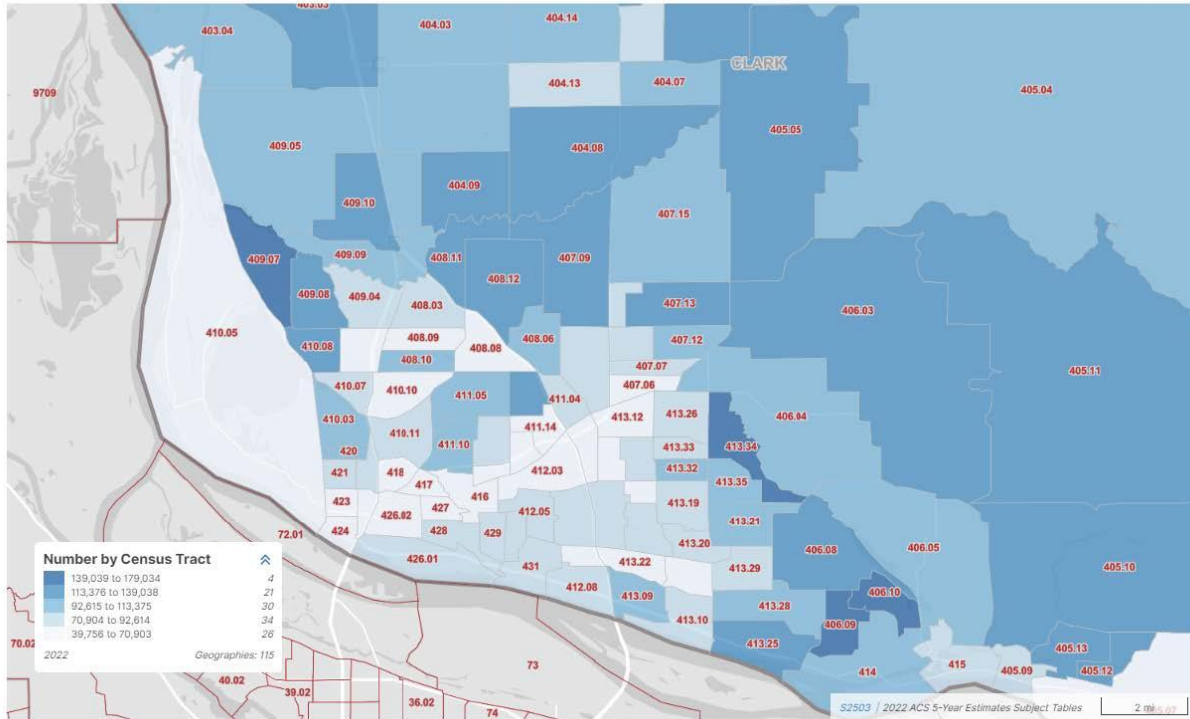
Source: US Census, 5-year ACS, S1701 – Poverty Status in the Past 12-months, 2022

Poverty in Vancouver demonstrates an unequal distribution, focusing on specific areas following these trends:

- Highest rates of poverty (20-30%) are along the Fourth Plain Corridor just west of I-205, Downtown, The Heights, and East Millplain.
- High poverty rates (13.5-20%) are in East Fourth Plain, Upper Main, and Fruit Valley.

Median Household Income

Median household income (dollars) - Occupied housing units | HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2022 INFLATION-ADJUSTED DOLLARS)



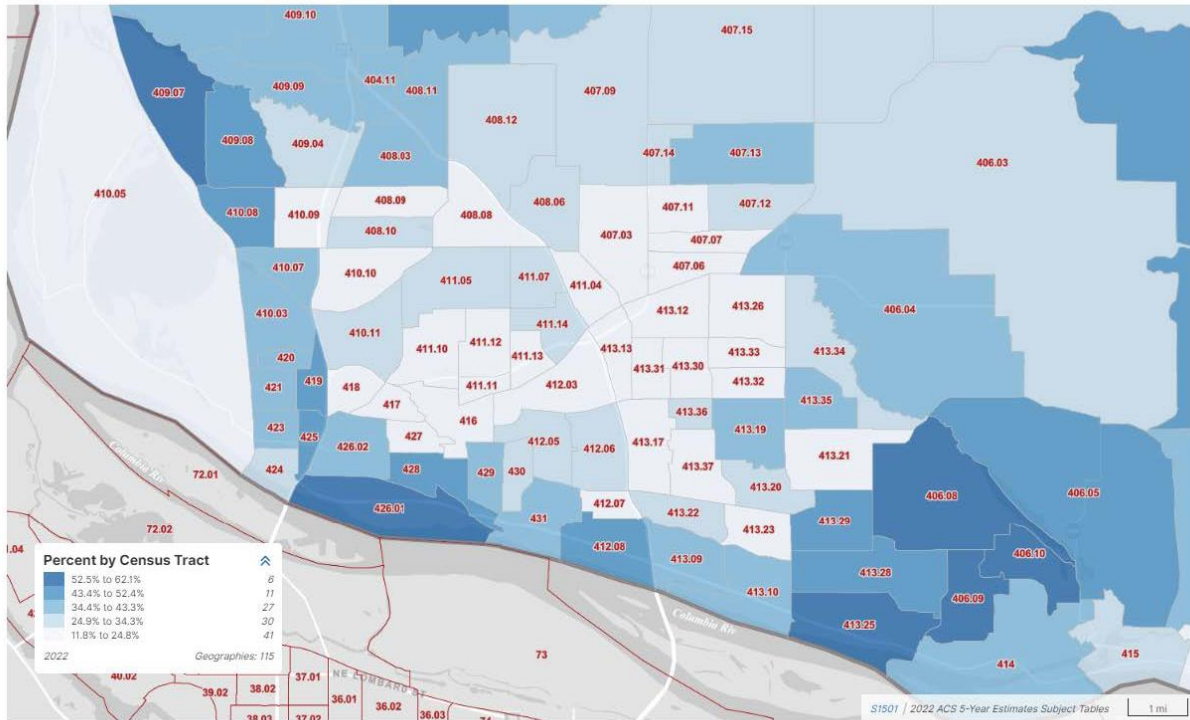
Source: US Census, 5-year ACS, S2503 – Household Income in the Past 12 Months, 2022

Median household income demonstrates a similar (but inverse) pattern to poverty. Income is another useful measure of RDI, as income often lines up with racial/ethnic populations.

There is a distinct band of census tracts with a low median household income following the Fourth Plain Corridor, Downtown, and Fruit Valley, and pockets of low-income in the Heights District, Rose Village, and West Minnehaha. For reference the county's median household income is \$97,678.

Educational Attainment

Bachelor's degree or higher - Percent | Population 25 years and over | AGE BY EDUCATIONAL ATTAINMENT



Source: US Census, 5-year ACS, S1501 – Educational Attainment (Bachelors Degree of Higher for 25 years and older population), 2022

Populations with a low percentage of bachelor's degree or higher for age 25 or higher are more likely to have lower median income and insecure employment. There are obvious trends in the areas of the city with the lowest educational attainment. For instance, the areas in the city's core (fourth plain corridor, East Mill Plain, and St. Johns/St. James) and Fruit Valley have lower percentages of higher education attainment.