

City of Spokane

Racially Disparate Impacts Analysis

HB 1220: Racially Disparate Impacts, Displacement, and
Exclusion in Housing

A requirement of the Growth Management Act (RCW 36.70A.70)

October 2025



PLAN SPOKANE
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Prepared by City of Spokane

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Land Acknowledgement

We acknowledge that we are on the unceded land of the Spokane people. And that these lands were once the major trading center for the Spokanes as they shared this place and welcomed other area tribes through their relations, history, trade, and ceremony. We also want to acknowledge that the land holds the spirit of the place, through its knowledge, culture, and all the original peoples Since Time Immemorial.

As we take a moment to consider the impacts of colonization may we also acknowledge the strengths and resiliency of the Spokanes and their relatives. As we work together making decisions that benefit all, may we do so as one heart, one mind, and one spirit.

We are grateful to be on the shared lands of the Spokane people and ask for the support of their ancestors and all relations. We ask that you recognize these injustices that forever changed the lives of the Spokane people and all their relatives.

We agree to work together to stop all acts of continued injustices towards Native Americans and all our relatives. It is time for reconciliation. We must act upon the truths and take actions that will create restorative justice for all people.

Adopted by Spokane City Council on the 22nd day of March, 2021 via Resolution 2021-0019

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1. Introduction

Housing and homeownership are foundational parts of belonging in a community. However, access to housing and housing challenges have not been felt equally and has impacted racial and ethnic groups in different ways. Understanding housing disparities is an important part of understanding who is being left out, what the systems are that are creating unequal access, and how the City of Spokane can undo the impacts.

In 2021, the Washington State Legislature changed the way communities are required to plan for housing. House Bill 1220 (HB 1220) amended the Growth Management Act (GMA) to require local governments to “plan for and accommodate” housing affordable to all income levels. This significantly strengthens the previous goal, which was to “encourage” affordable housing. In addition, new changes require local jurisdictions to examine racially disparate impacts, displacement, exclusion, and displacement risk in housing policies and regulations and adopt policies to begin to undo the impacts and address patterns of disinvestment ([RCW 36.70A.070\(2\)](#)).

The purpose of this report and evaluation is to move forward the work of analyzing the impacts of Spokane’s housing policies and regulations related to racially disparate impacts, displacement, exclusion, and displacement risk. This will inform changes to policies in the Comprehensive Plan relating to housing and land use as part of the [City’s Plan Spokane 2046 Periodic Update](#).

Specifically, the new requirements in RCW 36.70A.070(2) state that jurisdictions must now adopt a housing element that:¹

- (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 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.

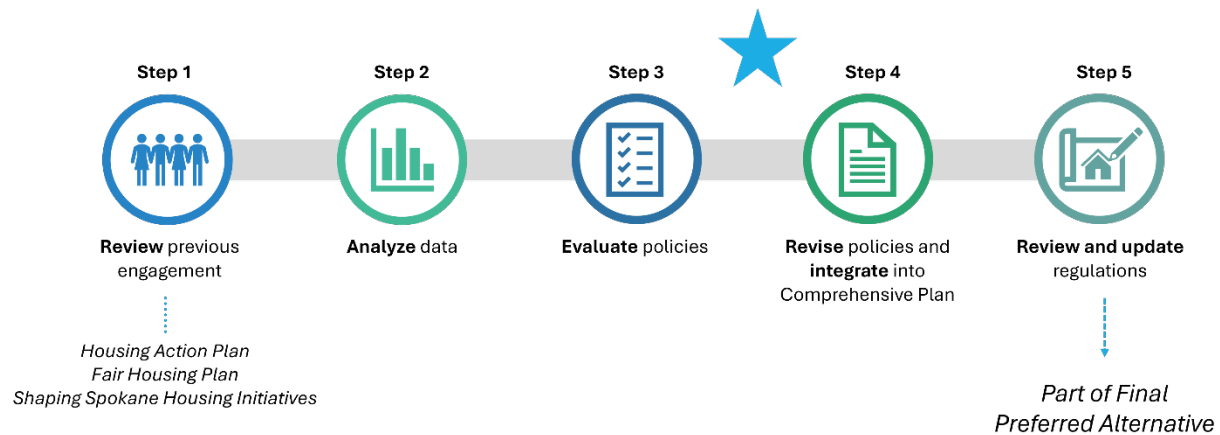
The Washington State Department of Commerce developed a guidebook in 2023, “Guidance to Address Racially Disparate Impacts,” for how to update the Housing Element to address the new

¹ RCW 36.70A.070(2). <https://app.leg.wa.gov/RCW/default.aspx?cite=36.70A.070>

requirements.² This analysis follows the guidance as the framing for the report and as a template for evaluation.

The process is outlined below in Figure 1. The first step is to review previous engagement and understand the community by identifying measures to evaluate racially disparate impacts, exclusion and displacement and populations at risk. The next step is data analysis to examine data for racially disparate impacts, exclusion and displacement and identify areas of higher displacement risk. Then policy evaluation helps to identify which policies contribute to disparate impacts, displacement or exclusion, and what new or improved policies are needed to undo impacts and prevent displacement. The recommendations of the policy evaluation are then integrated into the comprehensive plan policies. The final step is to review and revise regulations as part of the comprehensive plan periodic update.

Figure 1. Process for analyzing racially disparate impacts



The Draft RDI Report was released in September 2025 on the [PlanSpokane 2046 project page](#). City staff shared information via the PlanSpokane and Community Update newsletters, and presented to various committees, commissions, and boards for discussion:

- City Council Urban Experience Committee - September 8
- City Council Equity Subcommittee - September 17
- City Council Housing Action Subcommittee - September 18
- Plan Commission - September 24
- Community, Housing, and Human Services Board - October 1 (information only)
- Spokane Human Rights Commission - October 2

The RDI Report addresses the Steps 1-3 through policy evaluation. The Final Report will be an appendix to the PlanSpokane 2046 Comprehensive Plan, providing important context and foundational information. Ultimately, policy changes to the Housing Element will be presented in the adopted Comprehensive Plan. Additional public engagement will be part of the PlanSpokane 2046

² Washington State Department of Commerce (Commerce). (2023a). *Guidance to Address Racially Disparate Impacts: Updating your housing element to address new requirements*. <https://deptofcommerce.app.box.com/s/1I217I98jattb87qobtw63pkplzhxege>

process with workshops in November 2025 and reflected with analysis in the draft environmental impact statement. **Steps 4-5 will be policy revision, integration in the comprehensive plan, and review and update of the development regulations.**

1.1 Principal Definitions and Acronyms

Key terms from the statute are defined here, while the full list of definitions is included in the Commerce guidance.³

- **BIPOC:** Refers to “Black, Indigenous, and People of Color,” often shortened to BIPOC, and widely used to be inclusive of diverse races and ethnicities. For the purposes of this report, BIPOC includes Black or African American, Indigenous (referred to as American Indian and Alaska Native or AI/AN), Asian, Native Hawaiian and Other Pacific Islander (referred to as NHOPI), some other race groups, two or more races groups, and people of Hispanic/Latino ethnicity.⁴
- **Disinvestment:** The effect, regardless of intent, of differentiated outcomes for a group based on a protected classification. May be an action or failure to act.
- **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.
- **Exclusionary Zoning:** Zoning that limits the production of housing in a greater variety of housing forms that is affordable to low and moderate-income households, in a manner that may be intentional or unintentional, but which leads to non-inclusive impacts. This includes zoning laws such as exclusively single-family zones, minimum lot sizes, and separating multi-family development from single-family development.
- **Neighborhood Access:** Neighborhood access is the ability of a household to access housing in a specific neighborhood. Neighborhood access can be assessed by comparing household incomes to housing costs.

³ Commerce, 2023a

⁴ WA State Department of Commerce. (2022). *Homeownership rates for Black, Indigenous, and People of Color in Washington: Recommendations from the Homeownership Disparities Work Group*. https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Homeownership%20Disparities%20Recommendations%20Report%20-%20FINAL%20-%20Sep2022_e0b6a028-62cf-478c-aa9b-52e5e5c66609.pdf

- **Racially Disparate Impacts:** When policies, practices, rules or other systems result in a disproportionate, or unequal, impact on one or more racial groups.
- **Racially Restrictive Covenants:** Racially restrictive covenants were clauses within property deeds that prevent specific people from buying or occupying land, often people of color such as Asian, Jewish and Black buyers. These covenants, at the time of their use, were legally enforceable contracts, prohibiting property owners, developers and realtors from selling or renting property to specified racial or ethnic groups.⁵
- **Redlining:** In the late 1930s, the federal Home Owner's Loan Corporation (HOLC) evaluated mortgage risks in cities across the country, rating neighborhoods as "best," "still desirable," "definitely declining," or "hazardous" (Honig, 2021). Neighborhoods that were evaluated as being financially risky were marked in red—which gave way to the term "redlining"—and lenders were discouraged from financing property in those areas. Because neighborhood boundaries were often drawn along racial lines, this practice disproportionately prevented people of color from accessing credit and buying homes.

1.2 Measures Used in Evaluation

The WA Commerce Guidance to Address Racially Disparate Impacts (2023a) outlines several indicators to conduct data analysis for an assessment of racially disparate impacts, exclusion, displacement and displacement risk in housing.⁶ Additional analysis is included to provide deeper assessment of data and insights specific to Spokane.

The measures are defined as the following:

- **Direct Measures:** When policies, practices, rules or other systems result in a disproportionate impact on one or more racial groups.
- **Indirect Measures:** Measures of well-being that are related to where a person lives, including health, educational access, recreational access, and environmental risk exposure. Examining downstream effects of housing location and choice can help identify policies that may cause a racially disparate impact.
- **Measures of Exclusion:** 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. Exclusion is assessed by examining patterns of segregation; that is, identifying areas of the city in which the population does not reflect the composition of the overall population.
- **Displacement:** The process by which a household is forced to move from its community because of conditions beyond their control.
- **Displacement Risk:** The potential for households to be forced or pressured to move from their homes due to factors like high housing costs, development pressure, and economic hardships.

⁵ Seattle Civil Rights and Labor History Project. (2020). *Racial Restrictive Covenants*. Retrieved from University of Washington. <https://depts.washington.edu/civilr/covenants.htm>

⁶ Commerce, 2023a

1.3 Data List

Data Indicator	Primary Source	Type of Measure
HOLC Redlining Map	University of Richmond	Exclusion
Racially Restrictive Covenants	Eastern Washington University	Exclusion
Historic Trends in Homeownership	University of Washington	Direct
Homeownership	U.S. Census Bureau	Direct
Housing Cost-Burden	U.S. Census Bureau	Direct
Overcrowding	U.S. Census Bureau	Direct
Household Income	U.S. Census Bureau	Direct
Neighborhood Access	U.S. Census Bureau	Direct
Educational Access	Washington Office of Superintendent of Public Instruction	Indirect
Environmental Health Disparities	Washington State Department of Health EPA EJ Screen	Indirect
Climate Vulnerability	Spokane Climate Vulnerability Index	Indirect
Diversity Index	PolicyMap	Exclusion
Housing Choice Voucher	Spokane Housing Authority City of Spokane	Exclusion
Concentrations of Population Groups	City of Spokane Policy Map	Exclusion
Employment	U.S. Census Bureau	Exclusion
Evictions	Eastern Washington University	Existing Displacement
Foreclosures	City of Spokane	Existing Displacement
Demolitions	City of Spokane	Existing Displacement
Right of Way Acquisition	Washington State Department of Transportation	Existing Displacement
Rental Affordability	U.S. Census Bureau	Displacement Risk
Homeowner Affordability	U.S. Census Bureau	Displacement Risk
Unpaid Property Taxes	Spokane County Assessor	Displacement Risk
Access to Services	City of Spokane Spokane Transit Authority	Displacement Risk
Housing Age	U.S. Census Bureau Spokane County Assessor's Office	Displacement Risk
Development Pressure	City of Spokane	Displacement Risk
Social Vulnerability Index	Centers for Disease Control	Displacement Risk
Market Assessment	Washington State Department of Commerce	Displacement Risk

1.4 Key Findings

There is a persistent gap in homeownership rates for Black, Indigenous, and People of Color (BIPOC) households compared to White households, with the highest disparity among Black or African American households, Native Hawaiian and Other Pacific Islander households, and American Indian and Alaska Native households. In 2023, 61% of White, Non-Hispanic households owned their home in Spokane. In comparison, only 42% of people of color households were homeowners, making a gap of 19 percentage points, known as the racial homeownership gap.

Exclusionary zoning enacted by the City of Spokane reinforced the impacts of redlining and racially restrictive covenants, wherein redlined areas historically had a lower percentage of single unit zoning in residential areas. This had a segregating effect on BIPOC households and lower income households and played a significant role in influencing outcomes like homeownership opportunities and property values by disproportionately preventing people of color from accessing credit and buying homes.

Neighborhood access, income disparities, and housing affordability vary by race, putting homeownership farther out of reach for BIPOC households, who have limited access to neighborhoods and higher performing schools. The ability of Black or African American, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander households to access housing is considerably more limited, with access generally limited to Central and Northeast Spokane.

Environmental health disparities reflect systemic disparities of historic disinvestment, exasperating disparate outcomes for overburdened communities, including higher levels of exposure to environmental hazards and lower life expectancy. Almost one-third of Spokane's population live in an area that is considered extremely environmentally overburdened, with highest exposure to environmental harms along the I-90 corridor, particularly East Central, and Northeast Spokane, as well as the lower South Hill.

Patterns of segregation are reflected in the concentration of BIPOC households and uneven distribution of racial groups among neighborhoods within Spokane. However, data suggests that exclusion of people of color from Spokane for employment or housing is limited, based on residential and worker composition compared to Spokane County as a whole. This is likely due to Spokane being the leader in the region for affordable housing provision and a diversity of housing types that provide a range of options for residents and their needs.

Access to employment areas varies, with areas closer to downtown having better access to jobs, suggesting there is not an exclusion to jobs proximity. However, the proximity to I-90 in the central and downtown areas, which historically and currently have higher populations of communities of color, is still reflective of the legacy of divisive highway infrastructure. All workers of color had higher rates of taking public transit to work than White, Not Hispanic workers.

While Spokane has grown consistently over the last decade, growth has not been spread equally across the city, with both areas of increasing integration and areas experiencing displacement. Spokane has experienced diversifying population growth in areas with historically lower BIPOC populations. In contrast, areas with historically larger BIPOC populations saw a decrease in BIPOC population, which can suggest displacement or gentrification within these historic cultural communities.

In Spokane, households at both ends of the income spectrum have fewer rental units available for their income level. For households at moderate-income levels or greater, this indicates a lack of availability of market-rate units. For households at the extremely low-income level, this points to a constraint in affordability and availability, potentially exacerbated by competition for housing from higher income levels.

Housing patterns and policies concentrate multi-family subsidized housing primarily into Central Spokane and Northeast Spokane, which limits access and choice for low-income households, excluding them from large parts of the city.

Higher displacement risk exists in Central and Northeast Spokane, areas that have higher proportions of BIPOC and lower income households. This overlaps with areas that also have higher eviction and demolition rates, as well changing market factors that is increasing redevelopment.

The City of Spokane has made recent progress through land use and code changes that begin to undo the impacts of racially disparate impacts from historic policies and practices that continue to impact residents' ability to access housing and opportunities today. The policy evaluation outlines additional work to implement changes for a continued and strengthened focus on housing equity and accessibility over the next 20 years.

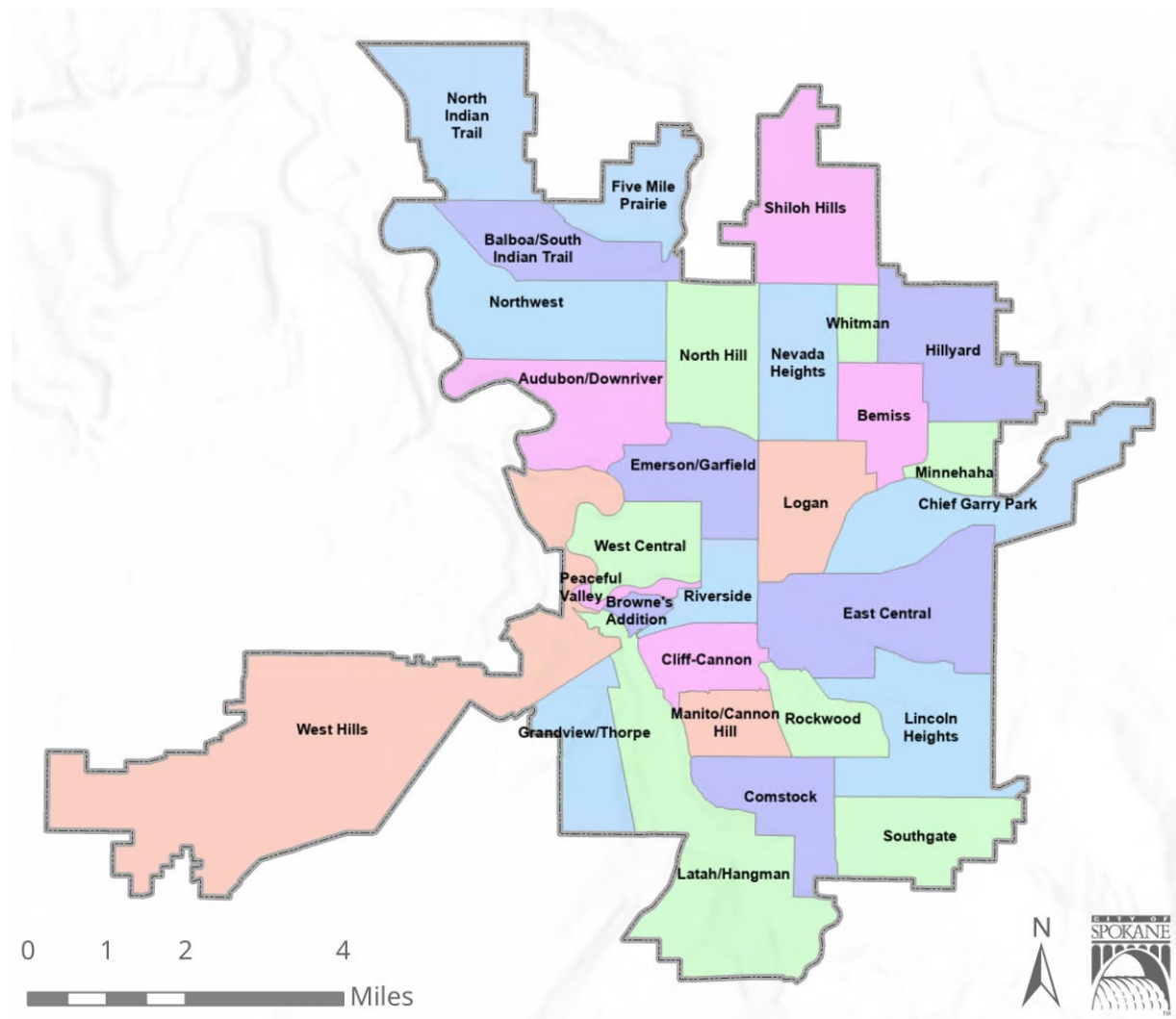
1.5 Neighborhoods

The City of Spokane has 29 neighborhoods, each providing a mix of housing and services. These boundaries, in addition to Census Tracts, are used throughout the analysis to tie data to specific locations and highlight where racially disparate impacts are occurring within the city when present. For more information on neighborhoods, visit the Office of Neighborhood Services on the City of Spokane website.⁷ See Figure 2.

While neighborhoods are important geographies, this analysis primarily utilizes Census Tracts to align with Census data. Census Tracts are usually smaller than the neighborhood scale and do not always align with neighborhoods or the city limits.

⁷ City of Spokane, Office of Neighborhood Services (ONS). <https://my.spokanecity.org/neighborhoods/>
Spokane Racially Disparate Impacts in Housing Analysis – October 2025

Figure 2. City of Spokane Neighborhoods



Source: City of Spokane, 2025

2. Historical Context

Racially disparate impacts are the result of direct and indirect policies and practices throughout history. Many of these actions entailed government support at all levels and some were implemented directly by government. The legacy of these policies continues to impact where present day Spokane residents can live, the quality of investments and services available to them, their homeownership opportunities, and access to generational wealth.

2.1 Tribal History and Settlement

The Spokane River has drawn people to the area for thousands of years and is part of the ancestral landscape of the Spokane Tribes of Indians, Coeur d'Alene Tribe, and Kalispel Tribe of Indians. The Spokane River and salmon were the reasons for native people gathering in this area, and continuous urban centers have flourished over the millennia, including at the confluence of Hangman Creek and the Spokane River.⁸ The Spokane Tribe and visitors from the Coeur d'Alene, Nez Perce and Palouse country gathered at the Spokane Falls to trap, dry and store many thousands of pounds of salmon.

The **Spokane Tribe of Indians** have called this area home for time immemorial. Their ancestors were a river people, living a semi-nomadic way of life hunting, fishing, gathering, according to the Spokane Tribe of Indians tribal history.⁹ They lived along the banks of the Spokane and Columbia Rivers and the tributaries in much of northeastern Washington, which consisted of approximately three million acres. During salmon runs, other tribes joined the Spokanes at the falls for fishing, trade, games, celebration, and socializing. The name "Spokane" is often translated as "children of the sun."

In the 1800s, U.S. soldiers arrived and displaced the Spokanes from their ancestral land as White settlement increased. In 1858, with no treaty established or adequate communications from the Federal Government, the Spokane's defended their families and country as U.S. soldiers marched through their country. Settlement increased within the area in the 1870s as the first sawmill was built, followed by stores, churches, schools, banks, hotels, saloons, and a newspaper. In 1881, President Rutherford B. Hayes formally established the Spokane Indian Reservation of approximately 154,602 land acres known as Chief Lot's reservation, which was located northwest of the present city.

From 1908, dams on the Spokane River displaced the Spokane Tribe's salmon-based way of life, further removing them from their ancestral homelands and way of life. In 1951, the Spokane Tribe officially became one of 574 recognized tribal governments within the United States following the passage of their formal Constitution that governs them today. Today, the Spokane Tribe of Indians primary government operations are located in Wellpinit, WA with a citizen population of approximately 2,900 enrolled members. The people of the Spokane Tribe have persevered through loss of land, forced relocation, and loss of their economic and spiritual base, the salmon.

⁸ Spokane Riverkeeper. *Spokane River History*. <https://www.spokaneriverkeeper.org/history-1>

⁹ Spokane Tribe of Indians. *The History of the Spokane Tribe of Indians*. <https://www.spokanetribe.com/history/>

The **Coeur d'Alene Tribe** has been in this area for many thousands of years, and was known as Schitsu'umsh, meaning "Those who were found here" or "The discovered people".¹⁰ The tribes' original homeland spans almost five million acres, stretching from Montana in the east to the Spokane River Valley, from near the Canadian border in the north to near the confluence of the Snake and Clearwater Rivers in north Idaho. Villages were established along the Coeur d'Alene, St. Joe, Clark Fork and Spokane Rivers. The Coeur d'Alene Indian Tribe has a current enrollment of over 2,190 members. The tribe has sovereign authority on a reservation covering 345,000 acres of mountains, lakes, timber and farmland, spanning the western edge of the northern Rocky Mountains and the abundant Palouse country.

The **Kalispel Tribe of Indians** traditional homeland surrounds the Pend Oreille River. It included the mountains, river, lakes and prairies that stretch from Lake Pend Oreille in North Idaho to where Paradise, Montana now stands and northwestward across northeastern Washington to the mouth of the Salmo River in British Columbia.¹¹ From 1880 to 1910, as more white settlers moved into Kalispel territory, the Tribe witnessed its land disappearing. The Kalispel Reservation was established on March 23, 1914 and is located in Usk, Washington. The Tribe also has Trust Land that includes a half square mile in the neighboring City of Airway Heights. The Kalispel Tribe includes 470 members, with a third of members live on the Reservation, a third live in Spokane, and a third live throughout the rest of the United States.

City of Spokane Historic Context

The removal of the Spokanes and other tribes opened the site of Spokane to homesteaders, and soon after settlers began arriving in the early 1800s.¹² By the late 1850s increasing numbers of White people were encroaching on tribal lands in pursuit of newly discovered gold in the Columbia River and its tributaries. Spokane became an incorporated city on November 29, 1881, with about 1,000 residents, encompassing 1.56 square miles. In 1880, just a year before incorporation, there were only 350 White people living in the town of Spokan Falls. By the time of the next census in 1890, Spokane residents had dropped the "Falls" from the town's name (and added an "e") and the city's population had increased to over 19,000 people. That number continued to grow and when the 1910 census was taken, over 100,000 Spokane residents were counted.

The expansion west brought mining, railroad, and timber industries, which also brought new immigrants from all over the world in the 1800s, including people from China and Japan who helped build local industries and established Spokane's Chinatown on Front Street.¹³ According to the history provided by Spokane Historical, Spokane's Chinatown began in the 1880s and was at first mostly populated by Chinese laborers who had immigrated in the 1850s and 1860s to work in the local railroad and mining industries, with Japanese immigrants arriving in the 1890s. Many Chinese and Japanese businesses were destroyed in the Spokane Fire of 1889 and the population of Chinese

¹⁰ Coeur d'Alene Tribe. *Ancestral Lands*. <https://www.cdatribe-nsn.gov/our-tribe/tribal-lands/>

¹¹ Kalispel Tribel of Indians. *Our Story*. <https://kalispeltribe.com/our-story>

¹² City-County of Spokane Historic Preservation Office (SHPO). (2023). *East Central Historic and Cultural Context*. <https://www.historicspokane.org/eastcentral>

¹³ Reames, Nicolette. (n.d.). "Spokane's Chinatown." Spokane Historical, accessed September 2, 2025, <https://spokanehistorical.org/items/show/400>

residents declined, partly due to the Chinese Exclusion Act of 1882 that prevented Chinese laborers from immigrating and denied recently-arrived Chinese citizenship. In 1921, Washington State passed the Alien Land Law which barred Asians from owning land, and the number of Japanese families declined in Spokane.¹⁴ WWII reversed this trend, however, when Spokane became a haven for Japanese families fleeing the threat of Internment camps on the West Coast, many of whom settled into what became known as Trent Alley. In 1974, the remaining buildings and courtyards of Trent Alley were destroyed to facilitate construction for Expo '74.¹⁵

African Americans began migrating to Spokane in the late 1800s, when the Great Northern Railroad brought Black workers to the area.¹⁶ Early families established businesses and organizations that served the growing Black population, including Peter B. Barrow, Sr. who established Spokane's Calvary Baptist Church in 1890, the oldest and longest-serving African-American Baptist Church in the State of Washington.¹⁷ Initially, Spokane's Black community was not confined to a specific area, however segregation later developed through local policies enacted on racial covenants and redlining, eventually concentrating the Black community in the East Central neighborhood. This history is explored more in [Section 2.3 Housing Segregation in Spokane](#).

2.2 Housing Segregation in Spokane

2.2.1 Racially Restrictive Covenants

Racially restrictive covenants were deed restrictions that kept homes from being sold to non-White racial or ethnic groups and were frequently applied during the first half of the 20th century.¹⁸ Restrictive covenants were used by developers to increase the desirability of new neighborhoods for White homeowners and to prevent the establishment of other groups into their neighborhoods. [See Figure 3](#). This resulted in segregated residential neighborhoods and reduced opportunities for disfavored groups to own a home.

Figure 3. Example of Racially Restrictive Covenant in Spokane

(c) No race or nationality other than the white race shall use or occupy any building on any lot, except that this covenant shall not prevent occupancy by domestic servants of a different race or nationality employed by an owner or tenant.

Source: The Local History. (2016). <https://thelocalhistory.com/interesting-bits/mapping-segregation-racially-restrictive-covenants-in-spokane/>

¹⁴ Northwest Fair Housing Alliance (NWFHA). (2020). *Systemic Residential Race Discrimination in Spokane - A 6 Minute History*. <https://www.facebook.com/watch/?v=2720561091490253>

¹⁵ Reames, n.d.

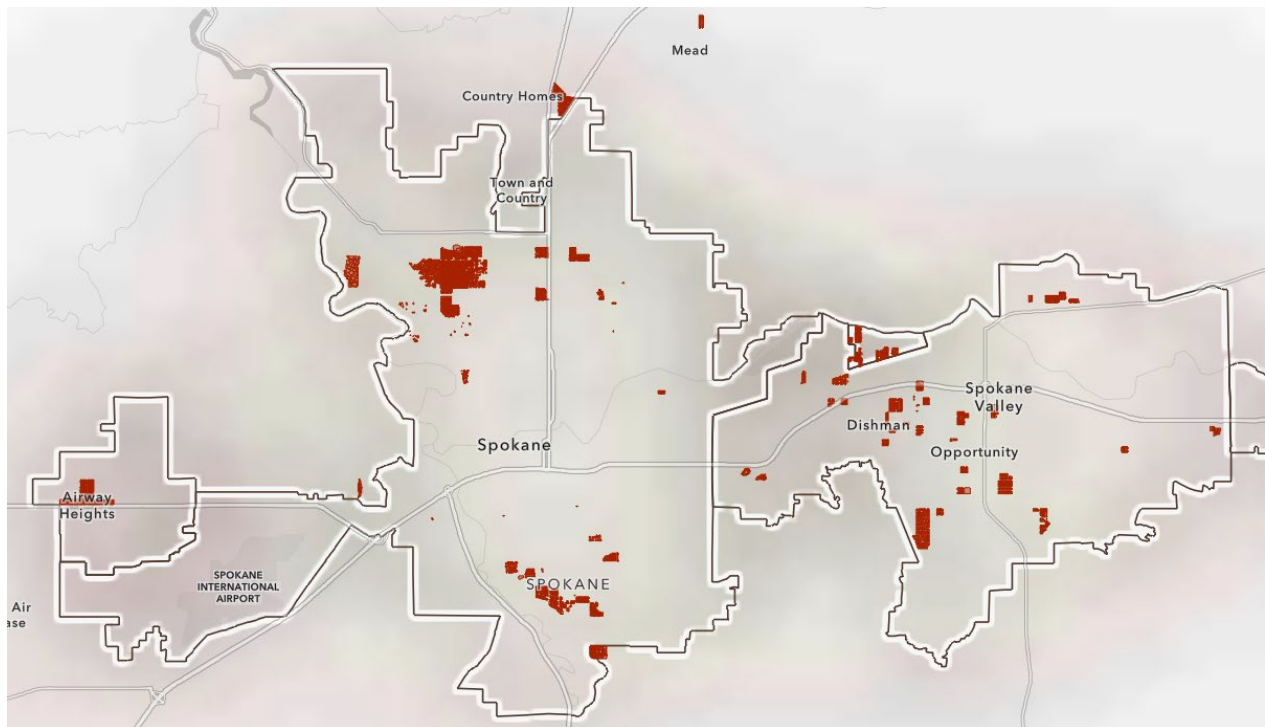
¹⁶ NWFHA, 2020

¹⁷ Wyngaert, Whitney. (n.d.) *Early African-American Pioneers in Spokane*. Spokane Historical. <https://spokanehistorical.org/items/show/738>

¹⁸ Commerce, 2023a

White property owners added racial restrictions to over 7,000 lots in Spokane County between the 1920s and 1950s.¹⁹ See Figure 4. Covenants were most common in Spokane in the northwest part of the city and on the South Hill. They were often applied to entire neighborhoods when an addition or subdivision was surveyed and platted, but they were also included in deeds when a single lot changed hands. Although covenants were agreements between private groups, they still required government action to record and enforce. Racial covenants were struck down as unenforceable by the Supreme Court in 1948 and discrimination based on race was banned by the 1968 Fair Housing Act, however difficulties securing home loans, obtaining fair interest rates, and disparities in access to credit persist to this day.

Figure 4. Location of Racial Covenants in Spokane County



Source: EWU, 2024.

2.2.2 Redlining

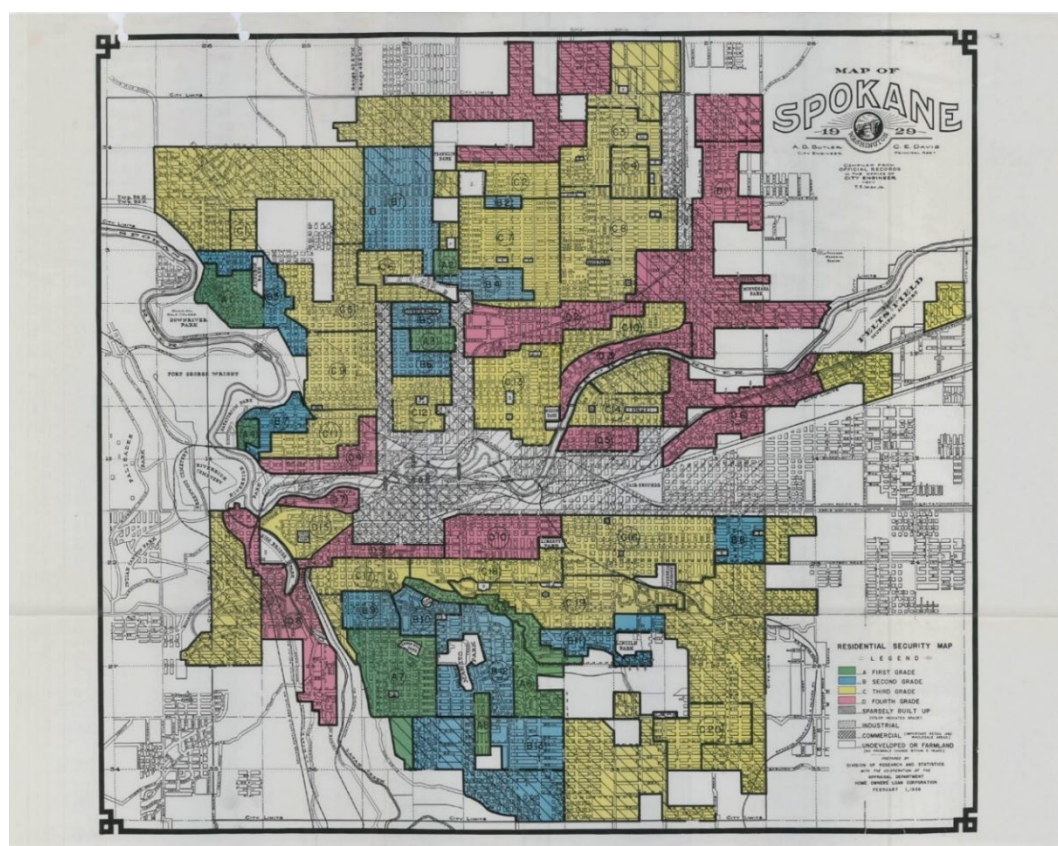
Redlining was the practice of denying financial services to residents of certain areas based on race or ethnicity, and has also had a lasting impact on communities nationwide. During the Great Depression, the US government created the Home Owners' Loan Corporation (HOLC) for the purpose of increasing access to home mortgages. To minimize risk, the HOLC created maps with ratings of the stability and desirability of each area and used the maps to limit loan guarantees. The HOLC developed the ratings with criteria that were explicitly biased against minority racial or ethnic groups as well as low-income households. Lenders, loan officers, and realtors used these maps to steer investments into White, predominantly higher-income areas, while "risky" areas, colored in

¹⁹ Eastern Washington University (EWU). (2024). *Racial Restrictive Covenants Project*.
<https://ewuracialcovenants.org/map/>

yellow and red on the maps, were excluded. Homogeneity (i.e. White-only areas), neighborhood quality (i.e. households with high income), and other attributes of neighborhoods were used in rating areas of Spokane. ²⁰

In the HOLC map from 1938, areas of Spokane were categorized into “grades” – the first grade in green signified the lowest risk for lending (A), blue was moderate (B), yellow was declining (C), and the fourth grade, indicated in red, signified a “hazardous” risk area for lending (D).²¹ See Figure 5. The ratings played a significant role in influencing outcomes like homeownership opportunities and property values by disproportionately preventing people of color from accessing credit and buying homes. Though the practice of redlining is no longer legal, its legacy continues to negatively impact communities of color through the historic lack of investment in yellow and red neighborhoods and the exclusion of those communities from transferring wealth to younger generations. See Figure 6 for example of HOLC scan.

Figure 5. Spokane Residential Security “Redlining” Map, 1938



Source: Mapping Inequality, University of Richmond

²⁰ Commerce, 2023a

²¹ The Digital Scholarship Lab. University of Richmond. (2025). *Mapping Inequality*. <https://dsl.richmond.edu/panorama/redlining/map/WA/Spokane/areas#loc=12/47.668/-117.3898>

Figure 6. HOLC Scan for Area D4, Old Court House District, Spokane, 1938

4. AVAILABILITY OF MORTGAGE FUNDS: a. Home purchase limited; b. Home building limited

5. CLARIFYING REMARKS: Zoned for industry, business and multi-family residential. Two or three negro families in area. Lot values run from \$2 to \$7 per front foot. Three or four blocks along Broadway and College in the western part are very much higher grade than the balance of the area and if it were not for their environs might be included in C-11. The area as a whole is a typical "red" area.

6. NAME AND LOCATION Old Court House Dist., Spokane, Wn. SECURITY GRADE D AREA NO. 4

Source: Mapping Inequality, University of Richmond (2025)

The University of Richmond's Digital Scholarship Lab collaborated with the National Community Reinvestment Coalition to create *Not Even Past: Social Vulnerability and the Legacy of Redlining*, a project that juxtaposes redlining maps from the 1930s with contemporary health disparities.²² The Social Vulnerability Index (SVI) from the Center for Disease Control provides an index to evaluate demographic and socioeconomic factors (such as poverty, lack of access to transportation, and crowded housing) that adversely affect communities that encounter hazards and other community-level stressors.²³ The SVI provides insight into where communities are more susceptible to those hazards or stressors and may lack the resources to adapt or respond, with areas closer to 1 having a higher vulnerability risk.

Comparing the HOLC map with the SVI, data shows that areas that were graded as A and B on the Spokane HOLC maps have lower social vulnerability today and areas that were graded as C and D have higher social vulnerability today.²⁴ When looking at the population data, areas graded C or D have higher percent of minority population today than areas that were graded A or B. Similarly, areas graded C or D also have lower life expectancy and higher percentage of poverty. No areas graded A or B on the HOLC map indicated a presence of a Black population, while 20% of the areas graded C and 60% of the areas graded D had a Black population. Areas that had a Black population indicated on the HOLC maps have a higher percentage of minority population today than areas that did not, as well as lower life expectancy and higher percentage of poverty—even higher than the areas graded D regardless of the presence of a Black population. [See Table 1.](#)

²² The Digital Scholarship Lab and the National Community Reinvestment Coalition, "Not Even Past: Social Vulnerability and the Legacy of Redlining," *American Panorama*, ed. Robert K. Nelson and Edward L. Ayers, <https://dsl.richmond.edu/socialvulnerability>

²³ Centers for Disease Control (CDC). *CDC/ATSDR Social Vulnerability Index (SVI)*. [2022]. Database [Washington]. <https://www.atsdr.cdc.gov/place-health/php/svi/index.html>

²⁴ The Digital Scholarship Lab

Table 1. HOLC Graded Areas and Social Vulnerability

HOLC Graded Areas	% Minority Population	% Population in Poverty	Life Expectancy in Years	Social Vulnerability Index
A (Green)	8%	12%	78.5	0.31
B (Blue)	14%	14%	77.3	0.42
C (Yellow)	17%	25%	74.3	0.64
D (Red)	19%	29%	73.9	0.65
Areas Noted with Black Population	20%	30%	72.7	0.70

Source: The Digital Scholarship Lab, "Not Even Past: Social Vulnerability and the Legacy of Redlining"

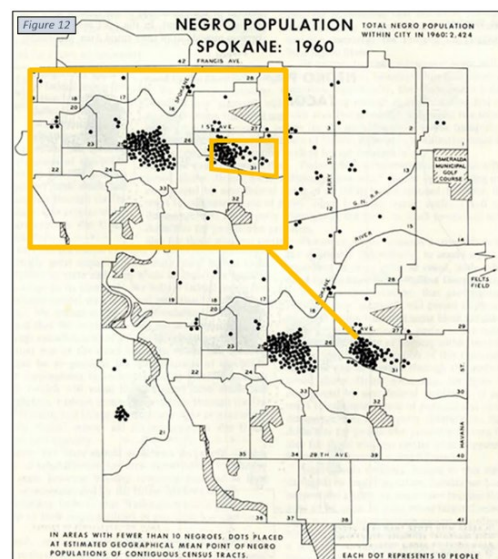
2.2.3 Housing Discrimination

Based on the practices of racially restrictive covenants and redlining, Spokane has a legacy of housing discrimination, including discrimination against African Americans who have been in Spokane since the days of the Washington Territory.²⁵ As population grew in the early 1900s, so did racial discrimination, with Black residents in Spokane increasingly steered into the East Central neighborhood starting in the 1940s. East Central, which had a diverse immigrant population from its establishment including many Italian families, had already been facing a post-war economic decline for decades. Spokane's Black population doubled from 1940 to 1950, and gained an additional 50% from 1950 to 1960, eclipsing one percent of the city's total population for the first time. This rapid growth in the number of Black Spokane residents intensified segregation, particularly in housing. By the 1960s, nearly a quarter of the Black population in Spokane lived in East Central, and the area around the 5th Avenue Business District became a residential center of Spokane's Black community.

When the 1938 HOLC map was created, East Central's Black population made up about 1% of the total, which was similar to the city as a whole. But by 1960, the Black population in East Central was larger than anywhere in the city except for downtown.²⁶ **See Figure 7.** As redlined, the properties in East Central were uninsured, which discouraged homeownership and encouraged renting. **Within two decades, Spokane shifted from a city where Black residents had relative freedom in housing choices to a city with a clearly defined Black neighborhood with vast swaths of residential land off-limits to Black residents.**

Nationally across the United States, there was a lack of investment in neighborhoods of color, which meant that redlined areas were more likely to be marked as blighted and slated for urban renewal projects including

Figure 7. Black Population in Spokane, 1960.



Source: Spokane Historic Preservation Office, 2023

²⁵ Spokane Historic Preservation Office, 2023

²⁶ Spokane Historic Preservation Office, 2023

federal highway construction.²⁷ In many cases, interstate routes were chosen based on areas where land costs were the lowest or where political resistance was weakest. In practice, this meant that low-income and communities of color, bore the burden of displacement caused by the development of divisive highway infrastructure.

East Central fell into the pattern of demolition for freeways was caused to many other redlined neighborhoods, and East Central was targeted for the construction of I-90 in the 1950s. When completed, I-90 bisected the neighborhood, displaced over a thousand residents, devastated the local economy, and significantly reduced the size of Liberty Park, an esteemed park planned by the Olmsted Brothers that had fallen into disrepair. The scars of redlining in East Central remain, a reminder of the legacy of housing discrimination in Spokane and a cause for action to address it going forward.

2.3 Zoning and Land Use

Zoning and other land use practices enacted by cities emerged in the 20th century and furthered the pattern of discrimination and shaped racially disparate impacts that are perpetuated today, as outlined by the WA State Department of Commerce.²⁸ Local zoning originated in the early 1900s as a tool to address growth and industrialization. From its beginning, zoning laws have been used to segregate households by race and ethnicity. The American Planning Association explains that “zoning, which is intended to separate incompatible land uses, has also been used to exclude certain population groups from single-family neighborhoods and to exclude multifamily rental housing from neighborhoods with better access to jobs, transit, and amenities.”²⁹

Cities often applied zoning in higher-income areas to limit housing types to single-family housing or to impose large minimum lot size requirements. In these areas, households with higher incomes could afford the extra land and larger houses required by local codes. These limitations artificially suppressed the production of new housing in middle- and upper-income neighborhoods, further limiting housing opportunities for lower- and moderate-income households, many of which include people of color. These practices are often referred to as “exclusionary zoning” because of their effects.

Comparison of HOLC maps can be made with the City of Spokane zoning map from 2006, which is shortly after the City adopted the first Growth Management Act compliant comprehensive plan in 2001, *Shaping Spokane*. Spokane, like many cities, has historically zoned a majority of residential areas for single units. **As the City’s Planning Department zoned residential areas, areas that were graded A and B coincided with areas that have a higher percentage of single unit zoning than areas that were graded C and D. See Figure 8.** Analysis demonstrates that:

- Areas graded A in Spokane were almost exclusively zoned for single units at 98%, while areas graded D had much lower representation at 59.6% single unit zoning.

²⁷ Commerce, 2023a

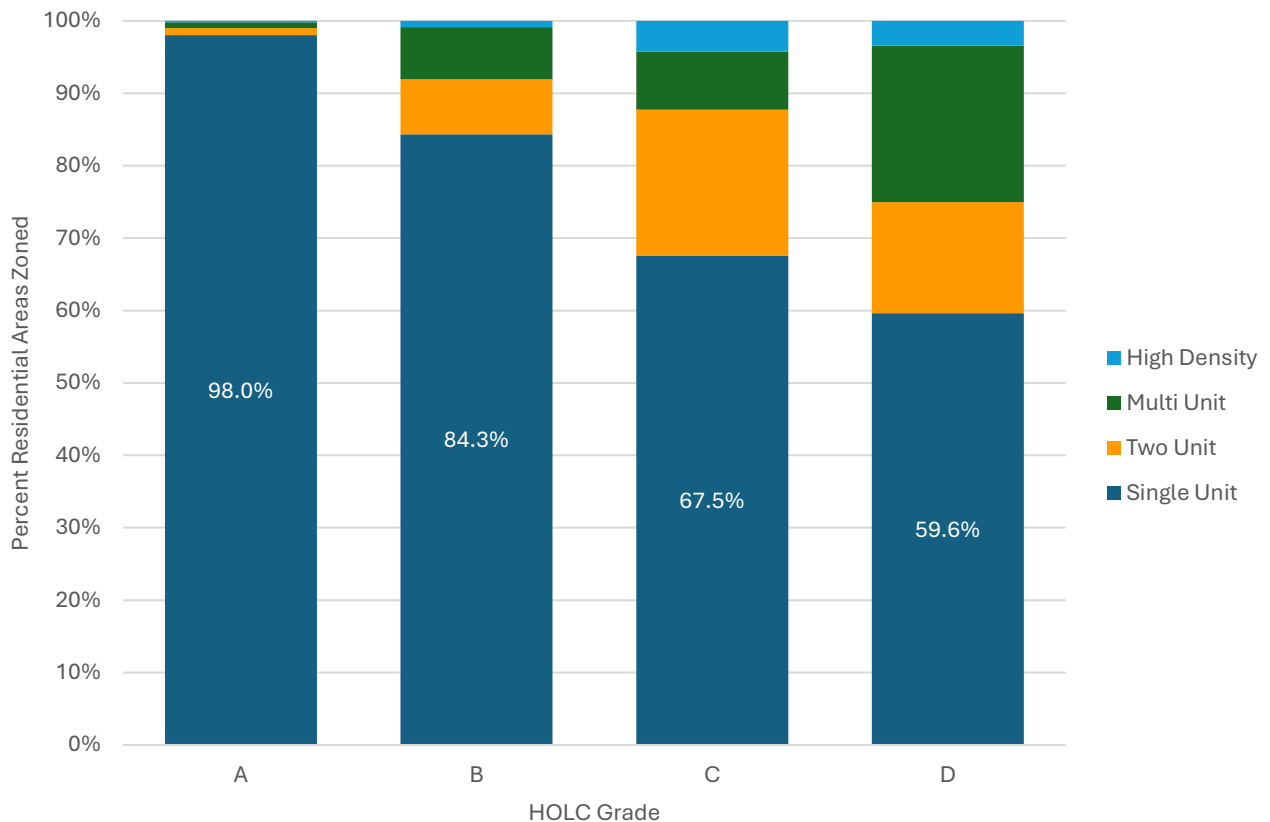
²⁸ Washington State Department of Commerce. (2020). *Guidance for Developing a Housing Action Plan*. <https://deptofcommerce.box.com/shared/static/pophc16jetggsctctmnbjomm0qa7tpu8.pdf>

²⁹ American Planning Association. (2019). *Planning for Equity Policy Guide*. American Planning Association. <https://www.planning.org/publications/document/9178541/>

- Areas graded D had higher percentage of multi-unit zoning than other graded areas, suggesting higher rates of apartments and fewer homeownership options.
- Areas graded C had a higher percentage of two-unit zoning than other areas, suggesting more housing diversity and options for homeownership.

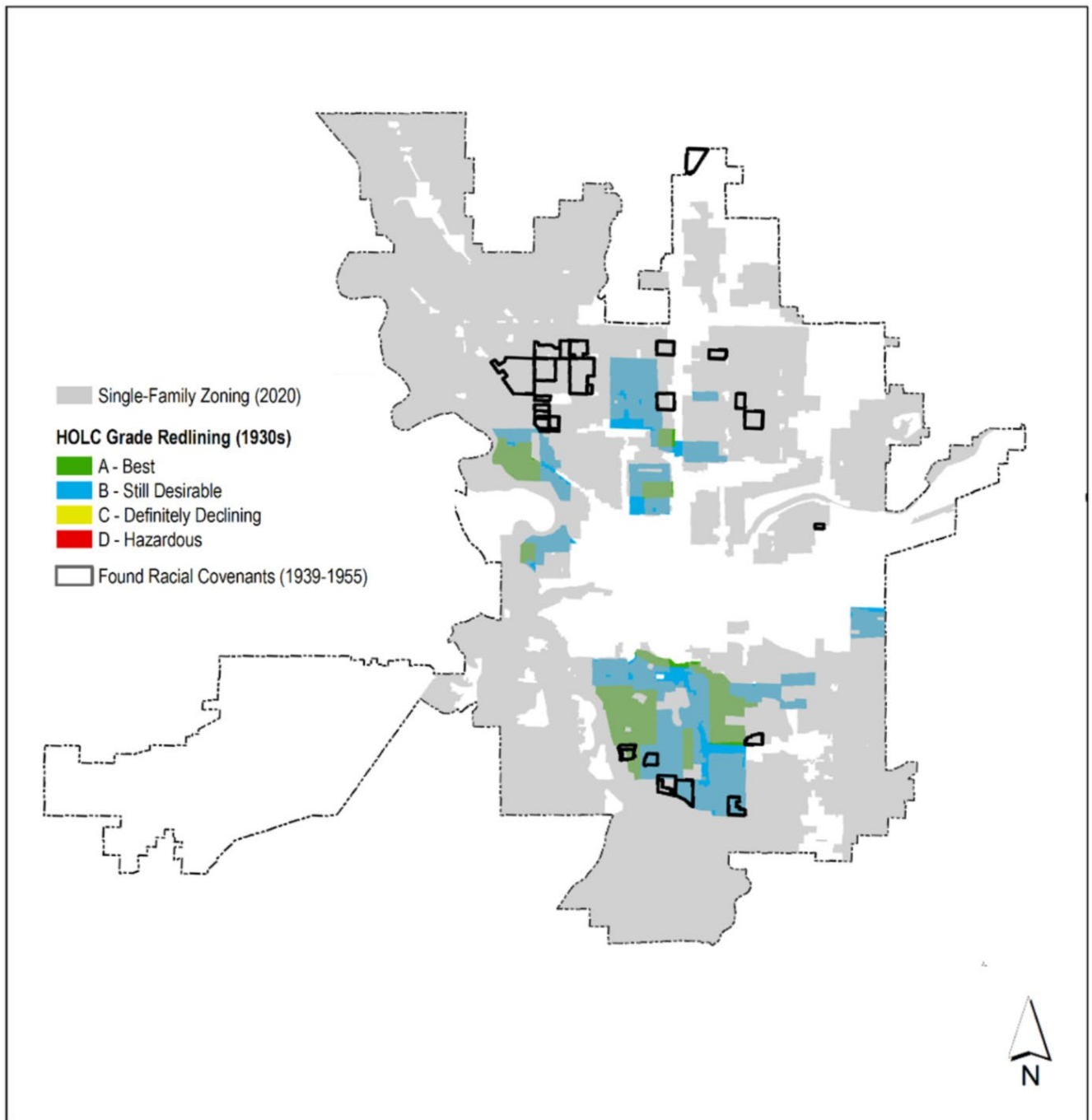
This comparison draws out the spatial pattern between redlining and historic zoning enacted by the City of Spokane, and identifying areas in Spokane that were rated as best and desirable through redlining and racially restrictive covenants that were further protected by zoning. [See Figure 9](#)

Figure 8. HOLC Grade by City of Spokane 2006 Zoning



Source: City of Spokane; Mapping Inequality, 2025

Figure 9. Single-Family Zoning and HOLC Grade



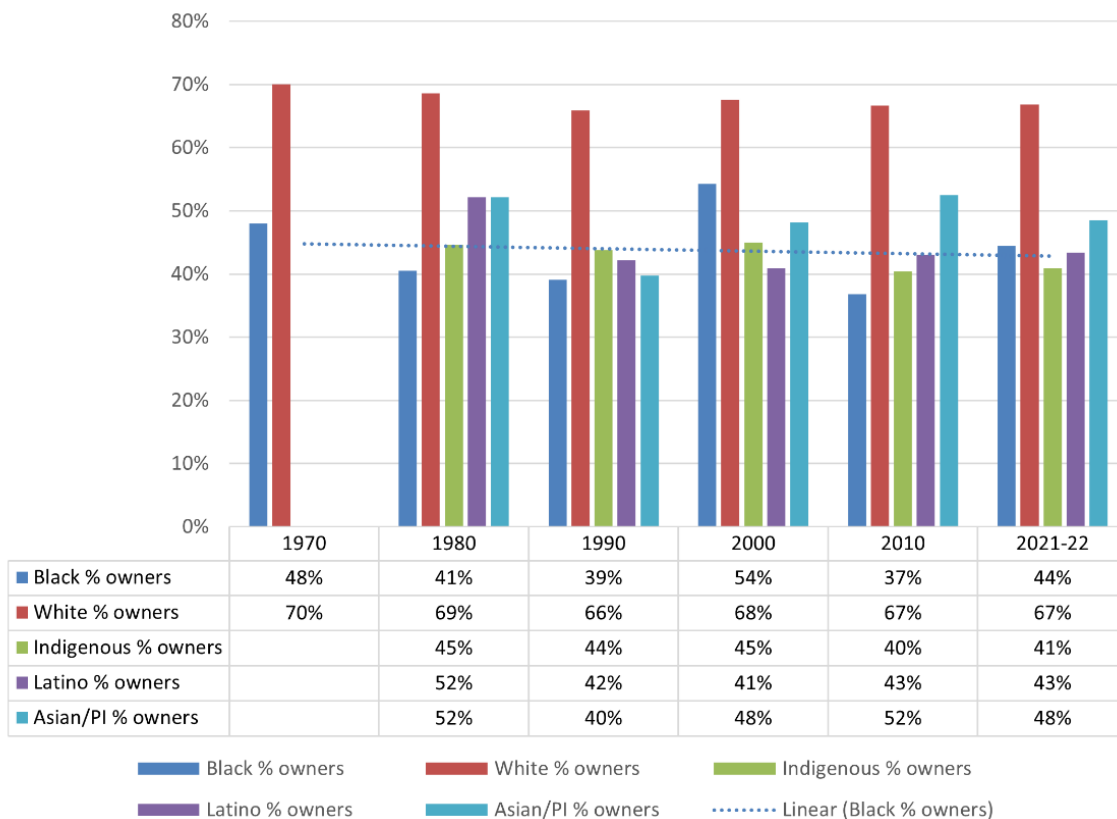
Sources: City of Spokane; EWU 2021; Mapping Inequality (2020)

2.4 Trends in Historic Homeownership Rates

The University of Washington Racial Restrictive Covenants Project shows homeownership rates and home values differentiated by race since 1970 for Washington State and for major counties in the state. **Statewide, about 69% of White families were homeowners in 2022 compared to 34% of Black families, which has decreased from 1970 when 48% of Black families owned homes.**³⁰

In Spokane County, homeownership for households of color has consistently been less than homeownership for White households and has dropped since the 1970s.³¹ Homeownership rates has varied over the decades, but by 2022, rates for all households of color in Spokane County had decreased at least 4 percentage points since 1970. Homeownership for White households has stayed constant with at least 66% since 1970. Two-thirds of White families are homeowners compared to 48% of Asian American families, 44% of Black families, 43% of Latinos, and 41% of Indigenous families. **See Figure 10**

Figure 10. Homeownership by Race, Spokane County, 1970-2022



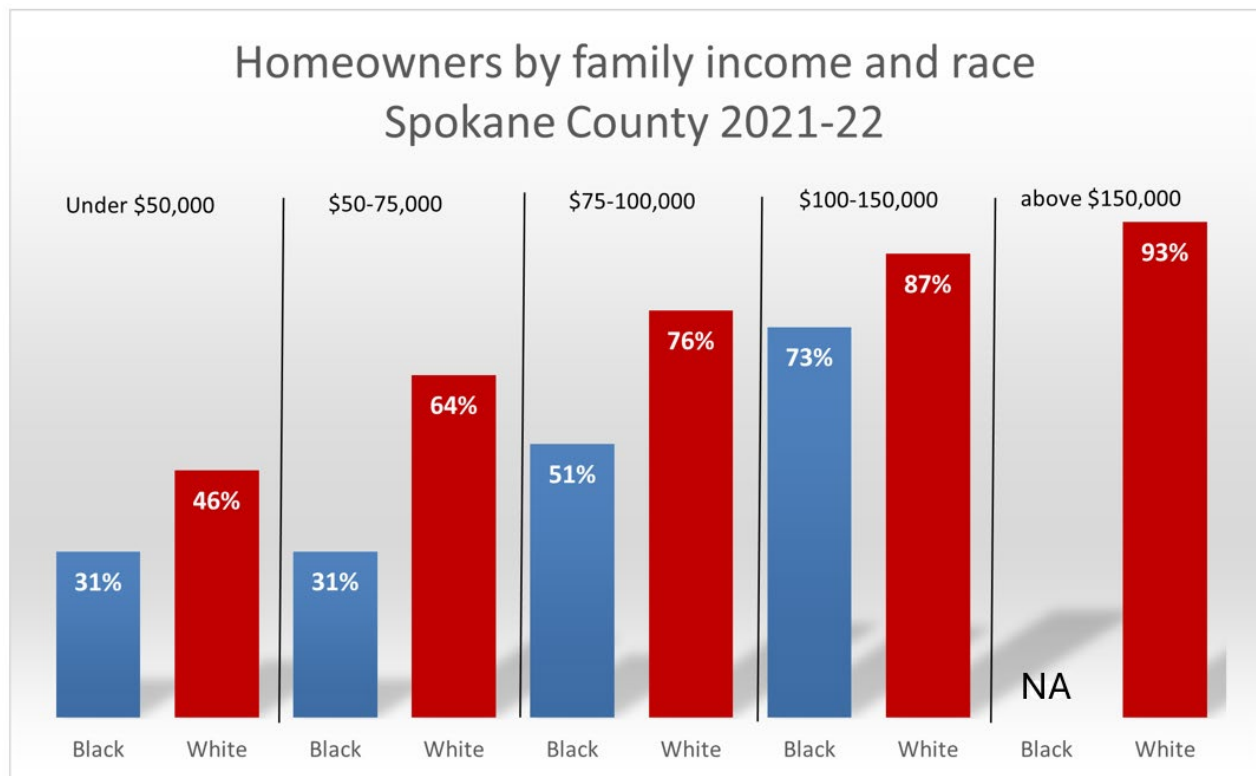
Source: UW Racial Restrictive Covenants Project, 2022. Note: Data is based on 1% samples of the population and may be subject to sampling error.

³⁰ University of Washington (UW). (2022a). Civil Rights & Labor History Consortium. *Racially Restrictive Covenants Project Washington State*. <https://depts.washington.edu/covenants/homeownership.shtml>

³¹ University of Washington (UW). (2022b). Civil Rights & Labor History Consortium. *Racially Restrictive Covenants Project Washington State – Spokane County*. https://depts.washington.edu/covenants/homeownership_spokane.shtml

The disadvantage that families of color face is still present when considering income and homeownership. When comparing homeownership rates between White and Black households, at every income level, White families are more likely to own homes than Black families. [See Figure 11.](#) For families earning \$100,000 to \$150,000, there is a 14% ownership gap between Black and White households, which grows even larger at more modest income levels. For those earning between \$50,000 and \$75,000, 64% of White families were owners compared to only 31% of Black families. There were too few Black families in the income over \$150,000 sample to report, demonstrating the disparity in high income earners that further suggests disparities in homeownership.

Figure 11. Homeowners by Family Income and Race, Spokane County, 2021-22



Source: UW Racial Restrictive Covenants Project, 2022. Note: Data is based on 1% samples of the population and may be subject to sampling error. There were too few Black families in the income over \$150,000 sample to report.

3. Current Housing Experience

3.1 Community Context

The City of Spokane (referred to as Spokane) is the second largest city in Washington State with a population of 229,447 in 2023.³²

Population Highlights (See Table 3):

- 78.5% of the population identify as White, Not Hispanic.
- Black, Indigenous, and People of Color (BIPOC) populations in Spokane account for 21.5% of the total population.
- The largest racial or ethnic group alone, other than White, is Hispanic or Latino at 7.8%, followed by multi-racial at 9.3%. Asian and Black or African American populations have similar rates at 2.9% and 2.7% respectively, while American Indian and Alaska Native and Native Hawaiian and Other Pacific Islander populations each account for 1% or less of Spokane's population.
- There are close to 81,000 White, Not Hispanic households (83.6% of households), and close to 16,000 BIPOC households (16.4% of households), totaling just over 95,000 households.
- 8.5% of the population 5 years and over, or 18,432 individuals, speaks a language at home other than English:
 - 2.8% speaking Spanish (6,163 individuals),
 - 2.5% speaking Indo-European languages (5,492 individuals),
 - 2.2% speaking Asian and Pacific Islander languages (4,834 individuals), and
 - 0.9% speaking other languages (1,943).

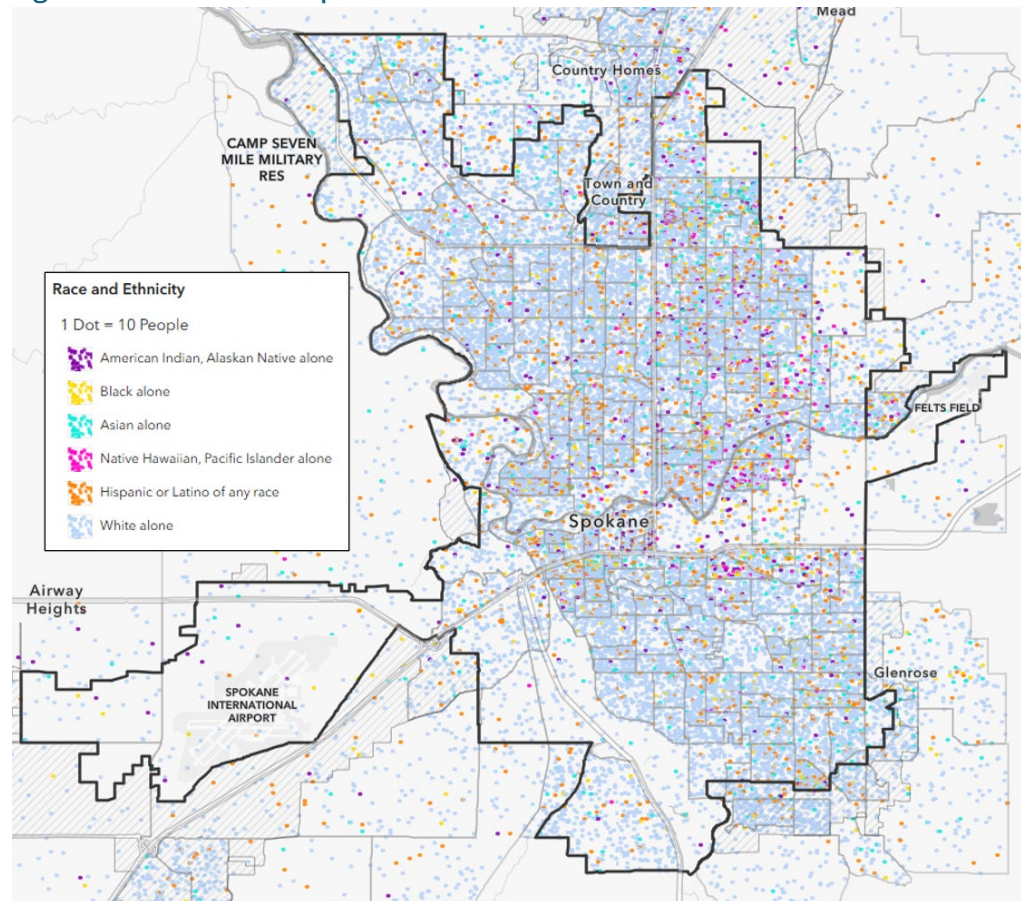
Table 2. Spokane Population by Race, 2023

Race/Ethnicity	2023	% Pop
White, Not Hispanic alone	179,992	78.5%
Black or African American alone	6,162	2.7%
American Indian and Alaska Native alone	3,006	1.3%
Asian alone	6,595	2.9%
Native Hawaiian and Other Pacific Islander alone	1,853	0.8%
Some Other Race alone	4,729	2.1%
Two or More Races	21,297	9.3%
Hispanic or Latino	17,904	7.8%

Source: U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table DP05

³² U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table DP05

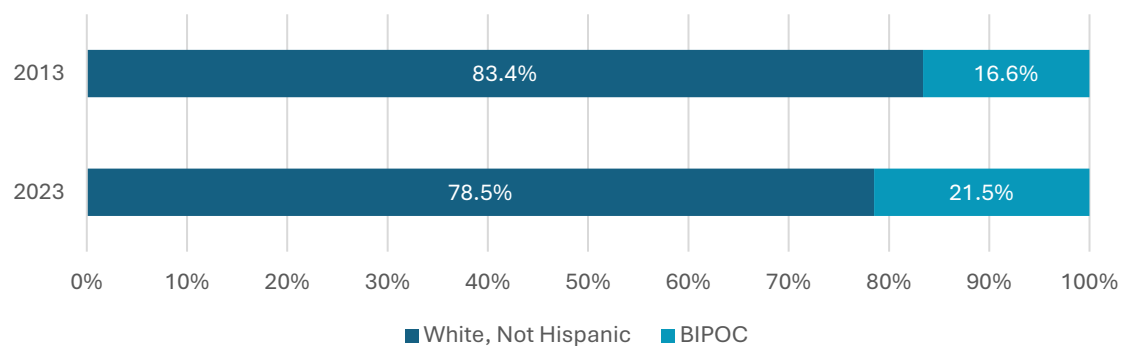
Figure 12. Racial Dot Map



Source: City of Spokane, Spokane Climate Vulnerability Index

From 2013 to 2023, Spokane gained close to 20,000 residents, an increase of 9.4%. During this time, the city became more diverse with the **proportion of BIPOC residents increasing from 16.6% to 21.5%** of residents while the proportion of the White, Not Hispanic or Latino residents decreased from 83.4% to 78.5% of residents. [See Figure 13](#)

Figure 13. Race and Ethnicity Composition, 2013 & 2023



Source: City of Spokane; U.S. Census Bureau. American Community Survey, ACS 5-Year Estimates Data Profiles 2013 & 2023, Table DP05.

Most of the population growth from 2013 to 2023 is seen in people who identify as multiracial (Two or More Races) and Hispanic or Latino population of any race. Other populations that more than doubled include the Native Hawaiian and Other Pacific Islander population and people identifying as Some Other Race. Smaller increases were seen in the Asian population, while the American Indian and Alaska Native population decreased during this timeframe. [See Table 3](#)

Table 3. Population Demographic Change, 2013 – 2023

Race/Ethnicity	2013	2023	% Pop	2013-2023 Pop Change	2013-2023 % Change
Total Population	209,478	229,228	-	19,750	9.4%
White, Not Hispanic alone	174,730	179,992	78.5%	5,262	3.0%
Black or African American alone	5,461	6,162	2.7%	701	12.8%
American Indian and Alaska Native alone	3,441	3,006	1.3%	-435	-12.6%
Asian alone	6,392	6,595	2.9%	203	3.2%
Native Hawaiian and Other Pacific Islander alone	882	1,853	0.8%	971	110.0%
Some Other Race alone	2,175	4,729	2.1%	2,554	117.4%
Two or More Races	9,454	21,297	9.3%	11,843	125.3%
Hispanic or Latino (or any race)	11,158	17,904	7.8%	6,746	60.5%

Source: City of Spokane; U.S. Census Bureau. American Community Survey, ACS 5-Year Estimates Data Profiles 2013 & 2023, Table DP05.

Multiracial Population: Two or More Races

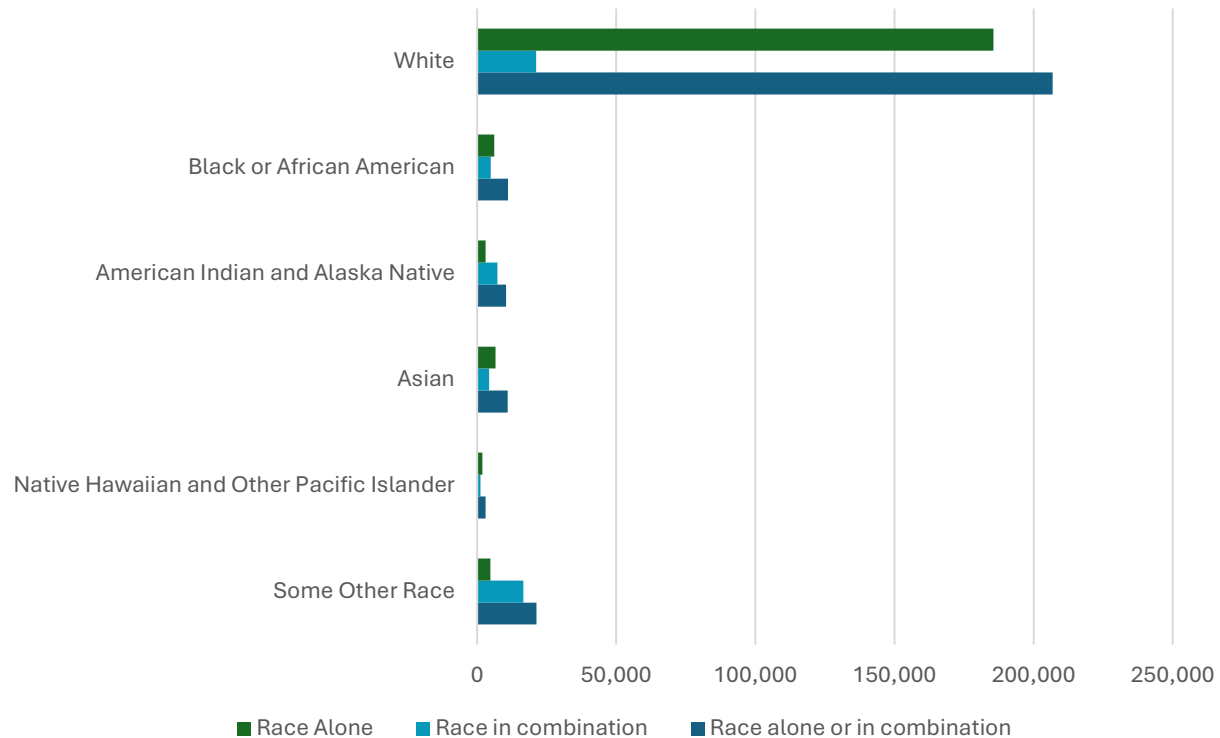
As Spokane is becoming more diverse, the city is seeing an increase in its multiracial population. When exploring the racial combinations that make up the multiracial category further, additional diversity beyond the race alone categories is revealed. In 2020, White multiracial was the largest category for Two or More Races, with an additional 21,000 people more than White alone in Spokane.³³ The Some Other Race population was the second largest in combination race group, with an additional 16,000 people—over 11,000 more than the Some Other Race alone group. When combining race alone or multiracial population, the Some Other Race group is over 22,000 people in Spokane, jumping from 2.4% of the population to 9.6% of the population. [See Figure 14](#)

The American Indian and Alaska Native population in particular had a larger multiracial population than AI/AN alone. When combining race alone or multiracial population, the AI/AN group is over 11,000 people in Spokane, jumping from 1.9% of the population to 5.1% of the population. All other racial groups had smaller multiracial populations than race alone. Black multiracial and Asian

³³ U.S. Census Bureau, U.S. Department of Commerce. 2020 Decennial Census.

multiracial populations both had over 4,000 additional people, jumping the race alone group from over 2% each to a combined population over 4% each.

Figure 14. Multiracial Population Comparisons by Race



Source: City of Spokane; U.S. Census Bureau. American Community Survey, 2020 Decennial Census.

Urban Native Population

The increase in American Indian and Alaska Native population when exploring multiracial population points to the diversity of the urban Native community in Spokane. Spokane is the eighth-largest urban Indian city in the United States, and Spokane County has people from over 300 tribes.³⁴ For many Native communities, systemic issues like racism, poverty, and poor education have given rise to health disparities. The Urban Indian Health Institute provides a community health profile for the Spokane Urban Indian Health Program, published in 2021. The report gives context for how government policies have impacted urban Indians, starting with policies that forced relocation in the 1950s, and termination policies that forced assimilation into non-Native culture.³⁵ Indigenous people come to cities for educational, employment, or housing opportunities and health care needs, resulting in an Indigenous urban population that is diverse and inter-tribal. Race, lack of access to education, unemployment, poverty, and housing all create inequities between urban Native populations. Urban

³⁴ The Native Project. *Who We Are*. <https://nativeproject.org/about-us/>

³⁵ Urban Indian Health Institute, Seattle Indian Health Board. (2021). *Spokane Urban Indian Health Program: Community Health Profile & Individual Site Report*. Seattle, WA: Urban Indian Health Institute. <https://www.uihi.org/uihp-profiles/spokane/>

American Indians and Alaska Natives frequently experience higher proportions of poverty and inequities in mortality, disabled status, infant and maternal health, and access to health insurance when compared to their White, non-Hispanic counterparts.

Native people who do not reside on their reservation or territorial land have many different residential and cultural experiences, outlined in a report on *Urban Indian America* by the National Urban Indian Family Coalition (2008).³⁶ Spokane was highlighted in the report as one of 10 major metropolitan areas that had a significant proportion of Native people in the country. Urban Indians exhibit higher rates of mobility than non-Natives, both within the same county and moving from one county to a different county. One way to capture the diverse experiences to is consider the many reasons that urban Indians live in cities and the length of time they have done so, including:

- Long term: Residents in cities for several generations, including the Native people who traditionally owned the land on which the urban center is based.
- Forced: Those forced to relocate to urban centers by government policy or the need to access specialized health or other services.
- Permanent: Those who have permanently relocated from other areas in search of different or better opportunities.
- Medium and short term: Those who may visit for specific purposes but do not intend to stay permanently (as in visits to family, relocation to pursue higher education, etc.)

This discussion on the urban Native community is included to highlight the significance of the population in Spokane and the emphasis for further consideration. This Racially Disparate Impact Report is limited in scope and currently restricted to available data for American Indian and Alaska Native demographics, primarily using Census data based on the AI/AN race alone. In providing baseline information, this report encourages further investigation to better understand housing needs and priorities of the urban Indian population in Spokane with quality, accurate data.

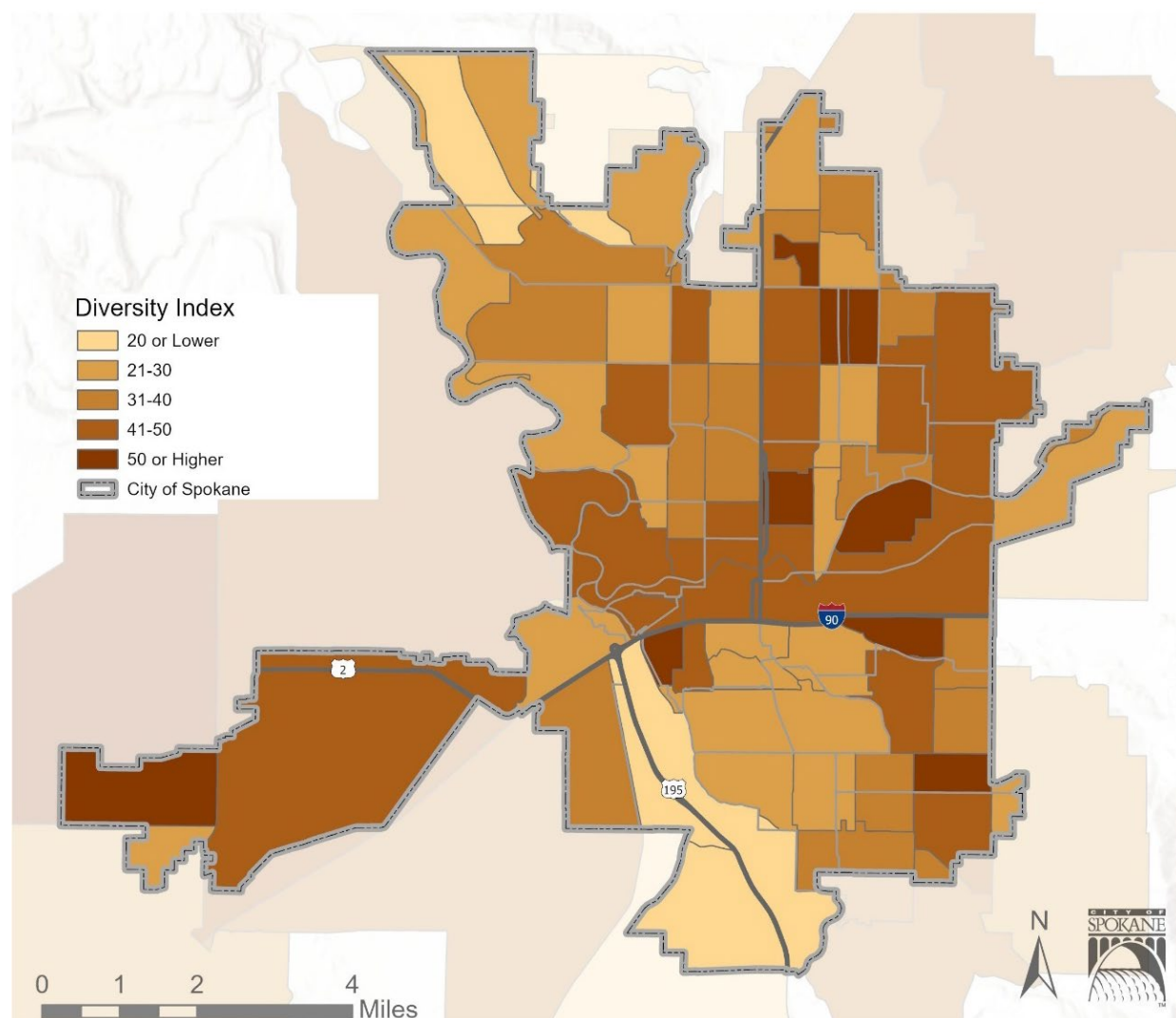
Diversity Index

The Diversity Index is another way to look at the racial composition of an area.³⁷ The index shows the probability that two individuals chosen at random would be of different races or ethnicities. Spokane County has a diversity index of 32.57 as a whole, indicating a 32.57% chance that two people chosen at random in the county would be of different races. **See Figure 15.** Neighborhoods that have Census Tracts with a high diversity index (50 or higher) in the City of Spokane include Chief Garry Park, Whitman, Shiloh Hills, and Logan in Northeast Spokane, and East Central, Cliff-Cannon, and Lincoln Heights south of I-90.

³⁶ National Urban Indian Family Coalition. (2008). *Urban Indian America: A discussion paper addressing the status of American Indian & Alaska children and families today*. A Report to the Annie E. Casey Foundation. <https://www.aecf.org/resources/urban-indian-america>

³⁷ PolicyMap. (2023). Diversity Index. <https://www.policymap.com/data/dictionary#Census%20and%20PolicyMap:%20Racial%20and%20Ethnic%20Diversity>

Figure 15. Diversity Index



Source: City of Spokane; Policy Map, US Census 2019-2023 ACS 5-Year Estimates. Note: Many Census Tracts stretch beyond the City.

3.2 Homeownership

In 2023, 61% of White, Non-Hispanic households owned their home in Spokane. In comparison, only 42% of Black, Indigenous, and people of color households were homeowners, making a gap of 19 percentage points, known as the racial homeownership gap.³⁸ The racial homeownership gap refers to the disparity in homeownership rates between different racial and ethnic groups, particularly between White and Black Americans.³⁹ This gap has persisted for decades,

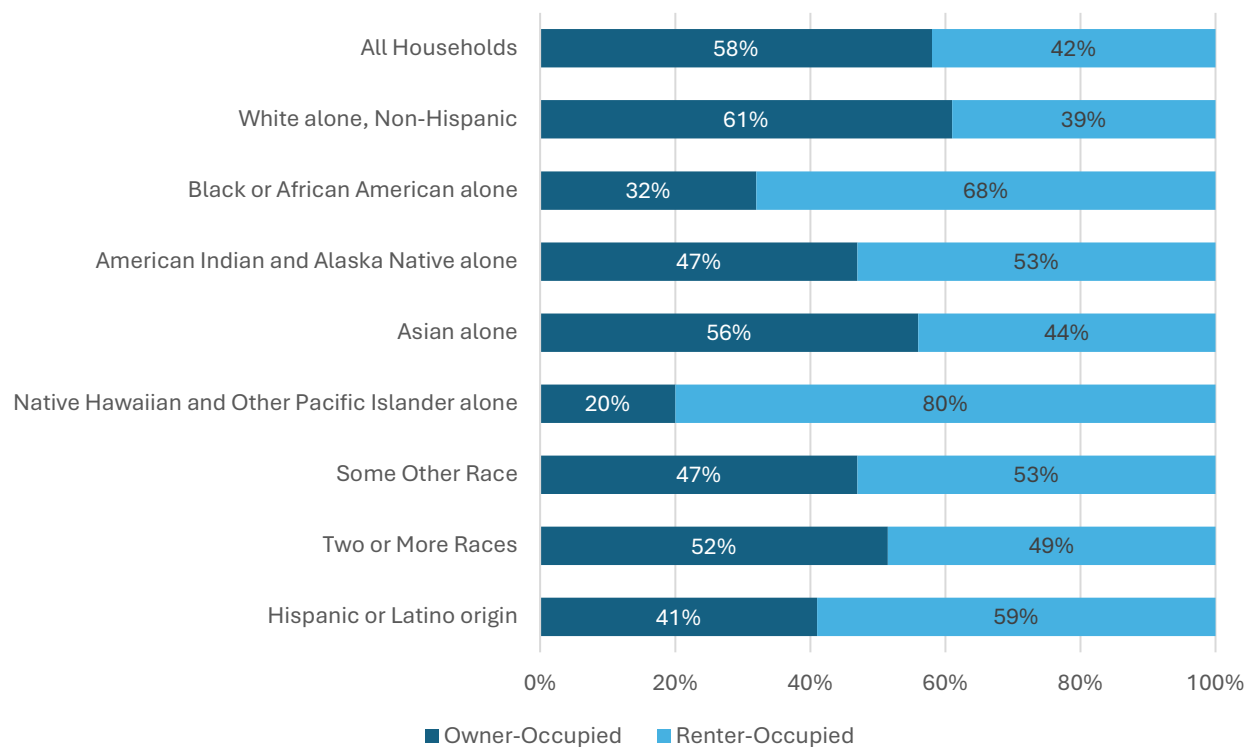
³⁸ The BIPOC homeownership rate is calculated by combining Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, and Hispanic or Latino origin homeownership data.

³⁹ Urban Institute. (2017). *Reducing the Racial Homeownership Gap*. <https://www.urban.org/policy-centers/housing-finance-policy-center/projects/reducing-racial-homeownership-gap>

with Black Americans consistently having lower homeownership rates than their white counterparts, and it is a significant contributor to the racial wealth gap. When looking at specific racial groups, the gap between White, Non-Hispanic households and Black households in Spokane was 29 percentage points, and 41 points for NHOPI households in 2023. [See Figure 16](#)

Compared to state and national levels, the homeownership rate for Black households in the city of Spokane is lower than WA State or the United States. The racial gap in homeownership rate is similar in Spokane as it is to the national level, but smaller than the racial gap at the State level.

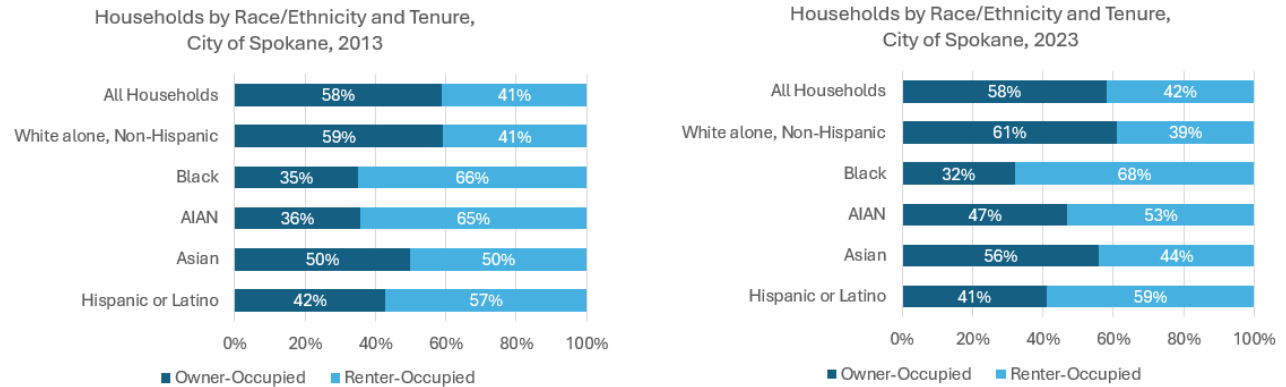
Figure 16. Homeownership by Race/Ethnicity and Tenure, 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table S2502

Homeownership rates in Spokane have remained consistent for all households when comparing 2013 and 2023 data, at 58% owner-occupied and 42% renter-occupied. When looking at data by racial groups, **homeownership rates have increased for all racial groups since 2013 except for Black households and Hispanic/Latino households**, which have both decreased by 3% and 1% respectively. [See Figure 17](#)

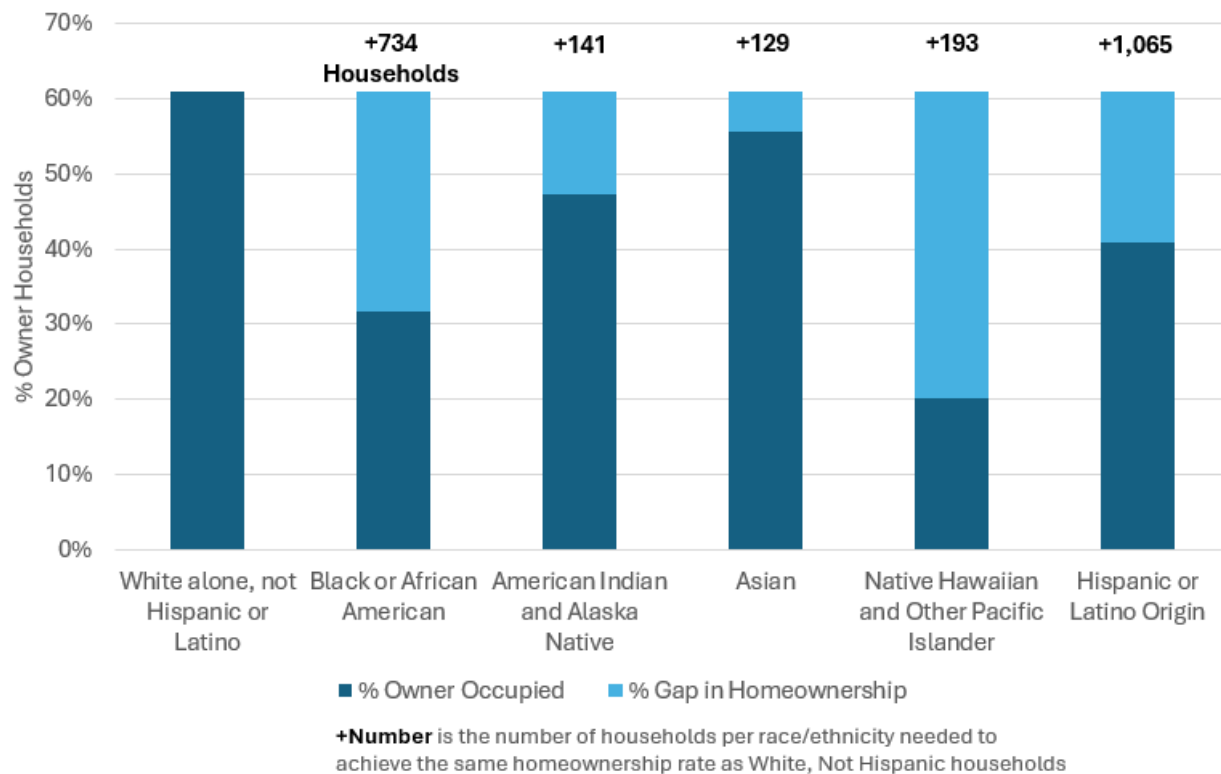
Figure 17. Households by Race/Ethnicity and Tenure, 2013 and 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey 2023: 5-Year Estimates and 2013: 5-Year Estimates, Table S2502. Note: Native Hawaiian and Other Pacific Islander households were omitted due to the margin of error in 2013 exceeding the population estimates.

Closing the homeownership gap will require an increase in homeownership for all populations of color. To achieve the same homeownership rate for BIPOC householders as White, Non-Hispanic householders, at 61%, there would need to be **2,261 more households of color as homeowners** in Spokane, using a 2023 snapshot. See Figure 18.

Figure 18. Gap in BIPOC Homeownership in Spokane, 2023



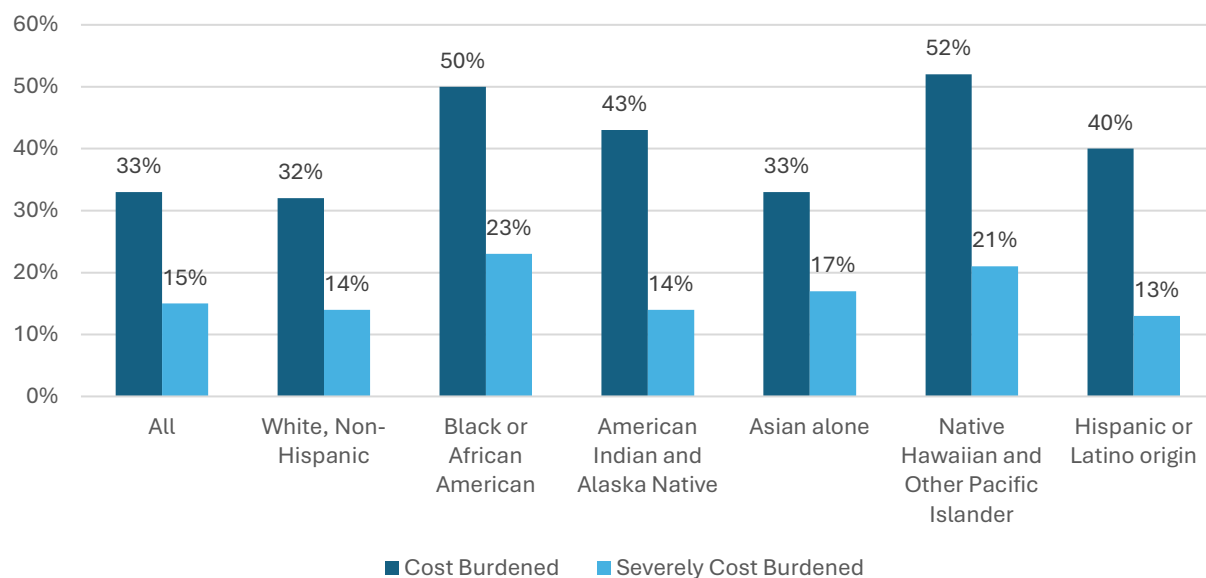
Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey 2023: 5-Year Estimates.

3.3 Housing Cost-Burden and Overcrowding

One indicator of a community's unmet housing need is the number of households that are experiencing housing "cost-burden," that is households that are paying more than 30 percent of their income on housing.⁴⁰ Households spending more than 50% of their income on housing costs are considered "severely cost-burdened." Households experiencing housing cost burden have limited resources left to pay for other life necessities such as food, clothing, medical care, transportation, and education. They are also at higher risk of displacement when housing costs rise, or life circumstances change. The risks increase in severity for lower income households in which remaining income may not cover basic needs.

In Spokane, 1 in 3 households are cost-burdened, with almost 1 in 6 severely cost-burdened. **Households of color have higher cost-burdened rates than White, Non-Hispanic households.** When looking at specific racial groups, half of Black and Native Hawaiian and Other Pacific Islander households are cost-burdened, and over 20% are severely cost-burdened. [See Figure 19.](#)

Figure 19. Housing Cost-Burden by Race/Ethnicity, 2023

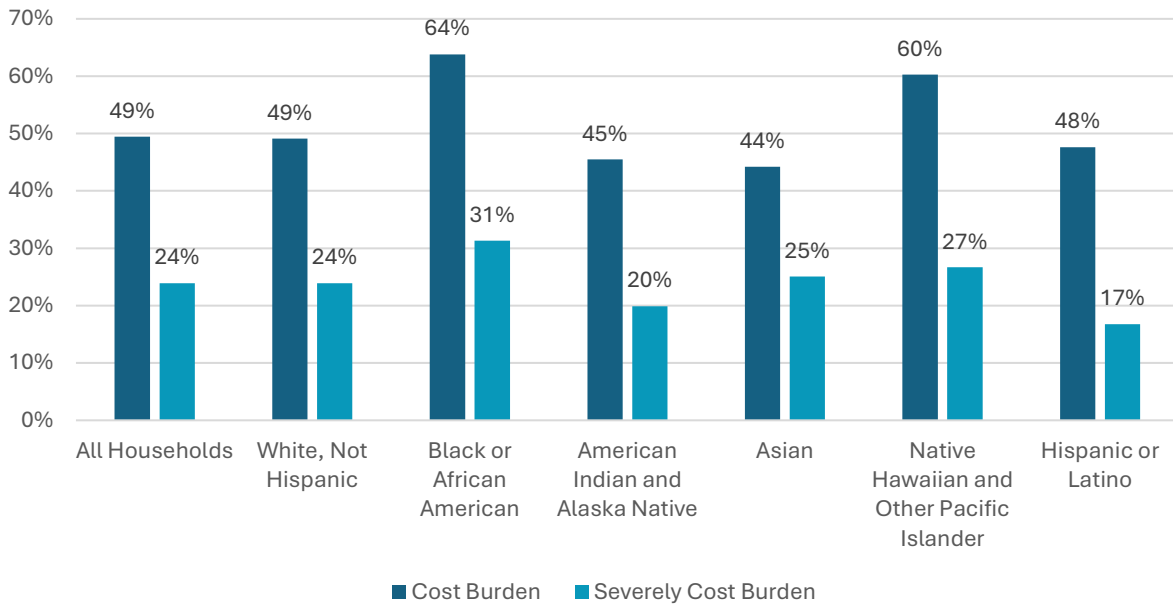


Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table B25140

For renter-occupied households, over 60% of Black and Native Hawaiian and Other Pacific Islander renter households paid more than 30 percent of their income on housing costs, which is more than 10 percentage points higher than White alone, Non-Hispanic households. Black and NHOPI renter households also have the highest rates of severely cost burden. [See Figure 20.](#)

⁴⁰ Commerce, 2023a

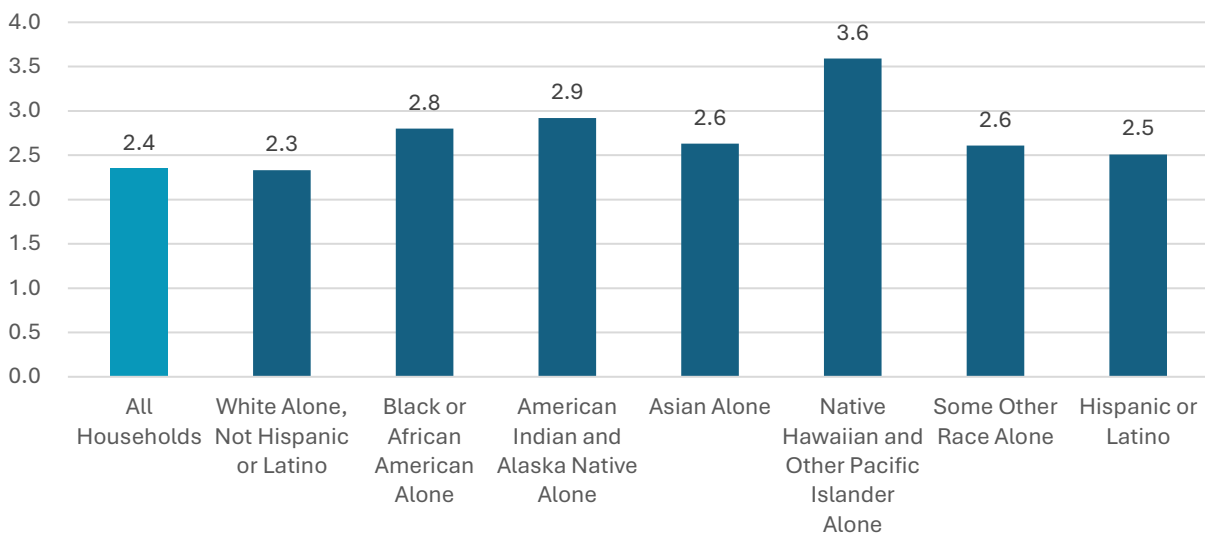
Figure 20. Renter Households with Housing Cost Burdens by Race/Ethnicity, 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table B25140

Household type and size are important considerations when finding a place to live. **On average, BIPOC households are larger at 2.8 persons per household compared to 2.3 persons per household for White households, which is consistent with the indicator of higher percentages of cost burden.** The average household size for all households is 2.4, while NHOPI has the largest at 3.6 persons per household. [See Figure 21](#)

Figure 21. Household Size by Race/Ethnicity, 2023

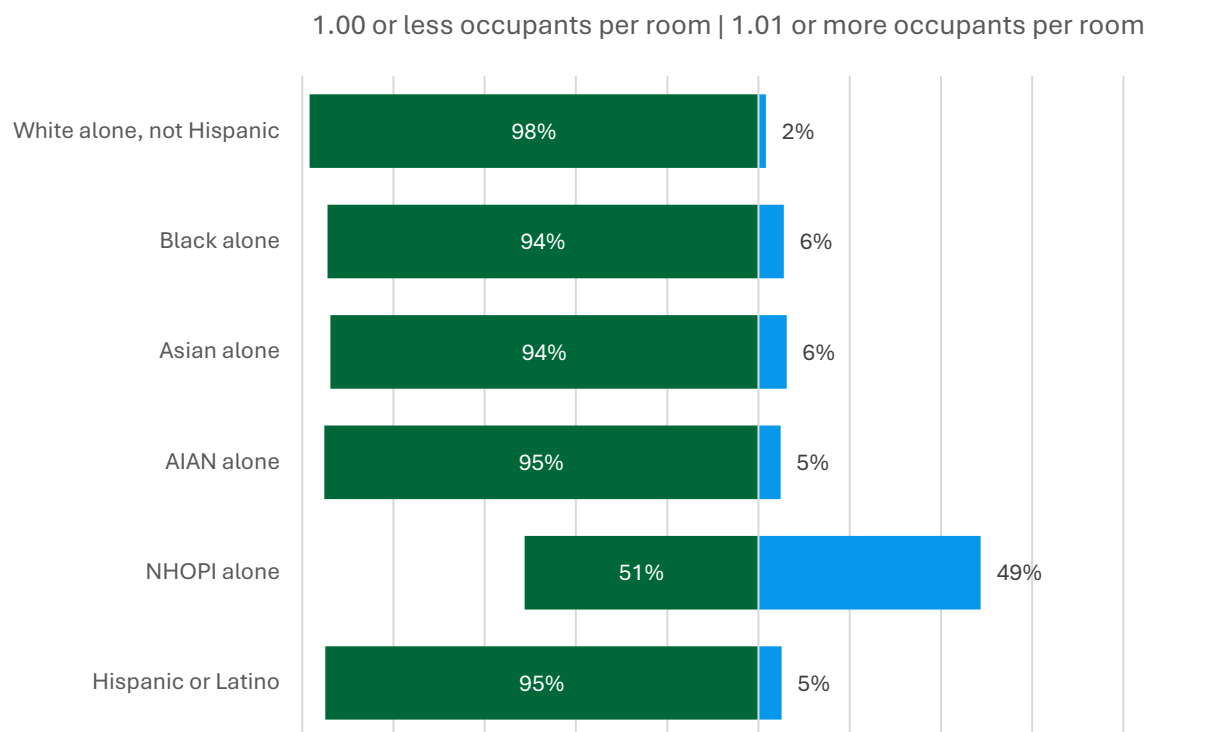


Source: City of Spokane; U.S. Census Bureau, Average Household Size of Occupied Housing Units by Tenure (2023). American Community Survey, ACS 5-Year Estimates Detailed Tables, Tables B25010A-H

Overcrowding, measured by more than one person per room in a dwelling unit, can be an indication that the available housing stock is too expensive relative the purchasing power of households or does not match household sizes.⁴¹ When people are living in homes that are too small for their household needs and size, this can indicate that more appropriate housing options are inaccessible due to a range of factors such as cost or location. Overcrowding is associated with negative health impacts related to physical health, mental health, and personal safety. Reviewing overcrowding rates by race and ethnicity may indicate disparities in housing impacts.

Knowing communities that are experiencing overcrowding in Spokane can help inform mitigating strategies to prevent negative health impacts. In Spokane, **BIPOC households experienced overcrowding at a rate higher than White, not Hispanic households** in 2023. NHOPI households experiencing a significantly higher rate (49%) of overcrowding than all other races. This may be an indicator of housing affordability issues, as well as multi-generational living. [See Figure 22](#)

Figure 22. Occupants per Room by Race/Ethnicity, 2023



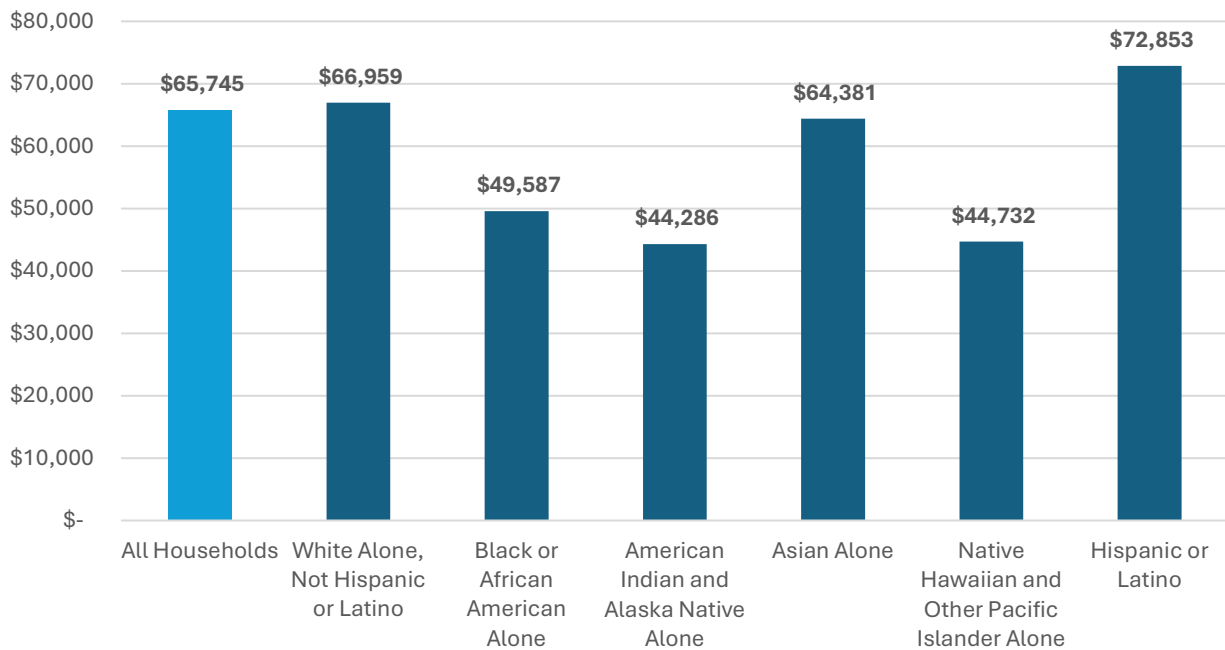
Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. (2023). American Community Survey 2023: 5-Year Estimates. Tables B25014A-I.

⁴¹ Commerce, 2023a

3.4 Income and Housing Cost

The median household income in the city of Spokane in 2023 was \$65,745, less than the median household income for Spokane County at \$73,380. The median household income for White, Non-Hispanic households was higher than the city level at \$66,959, while Hispanic or Latino households had the highest income at \$72,853. **The median household income was nearly a third less for Black or African American, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander households. See Figure 23**

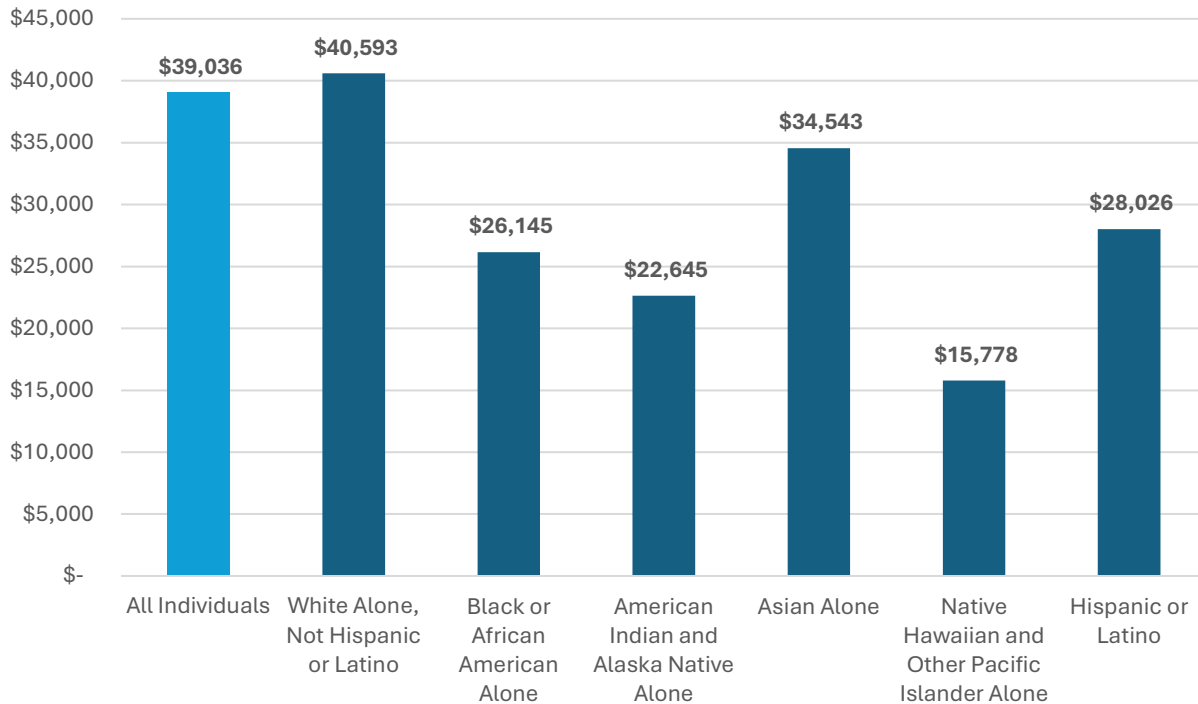
Figure 23. Median Household Income in Past 12 Months, 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. (2023). Median Household Income in the Past 12 Months (in 2023 Inflation-Adjusted Dollars). American Community Survey, ACS 5-Year Estimates Detailed Tables, Tables B19013A-I

While housing is experienced at a household scale, larger household sizes for households of color, whether cultural or economically driven, play into household income. When income and race are compared at the individual level, rather than household level, disparities become more apparent. **The median individual income in 2023 for all households was \$39,036. See Figure 24**

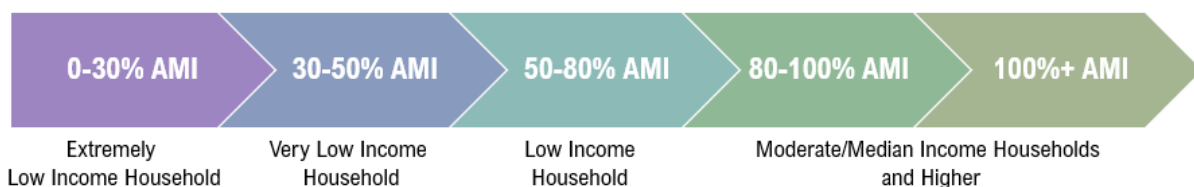
Figure 24. Median Individual Income in Past 12 Months, 2023



Source: City of Spokane; U.S. Census Bureau, Per Capita Income in the Past 12 Months (in 2023 Inflation-Adjusted Dollars). American Community Survey, ACS 5-Year Estimates Detailed Tables, Tables B19301A-H. Note: This figure represents the income of individuals over the age of 15 who earned \$1 or more in the past year.

When examining household income levels, the Area Median Income (AMI) is a helpful benchmark for understanding what different households can afford to pay for housing expenses. Since housing needs vary by family size and costs vary by region, the Department of Housing and Urban Development (HUD) produces a median income benchmark for different family sizes and regions on an annual basis. These benchmarks help determine eligibility for HUD housing programs and support the tracking of different housing needs for a range of household incomes.

Area Median Income

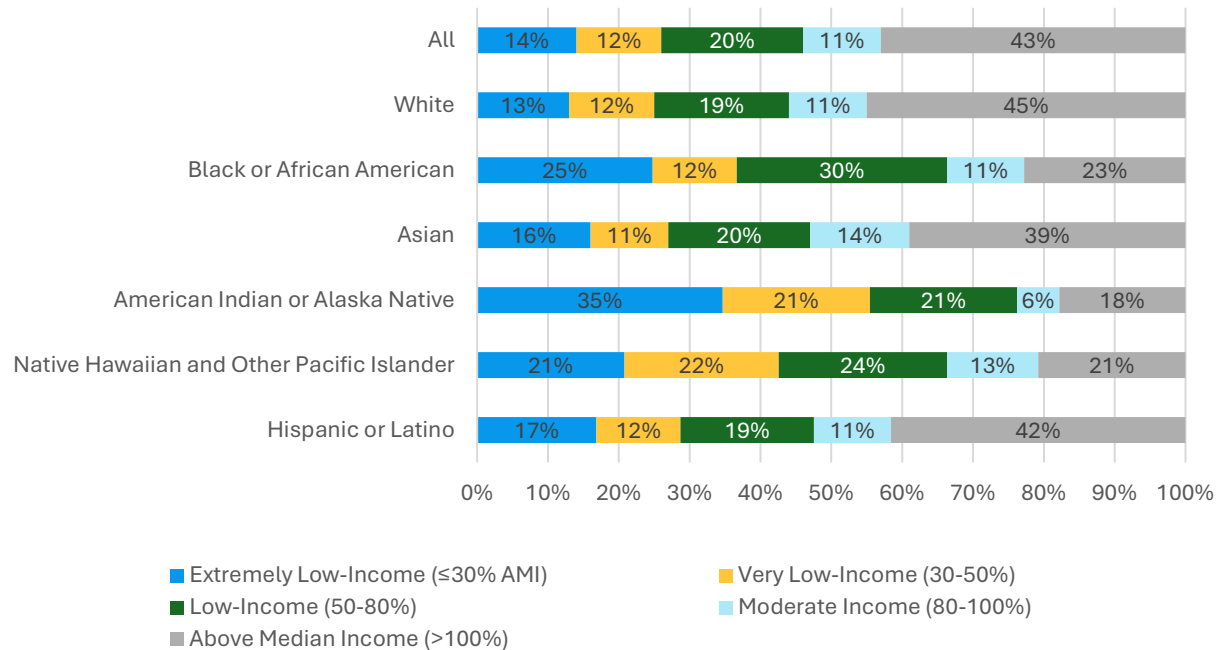


Source: Spokane Housing Action Plan, 2021

With 45% of households making greater than 100% AMI, the community with the highest percentage of households earning above the area median income is White households, followed by Hispanic or Latino households with 43% of households making more than median income. **A higher distribution of households of color earn less than 80% of the City's AMI, compared to White households. See**

Figure 25. Over 60% of Black and NHOPI households earn less than 80% AMI. American Indian and Alaska Native households earn less, with over three quarters of households earning less than 80% AMI and a third making less than 30% AMI (extremely low-income).

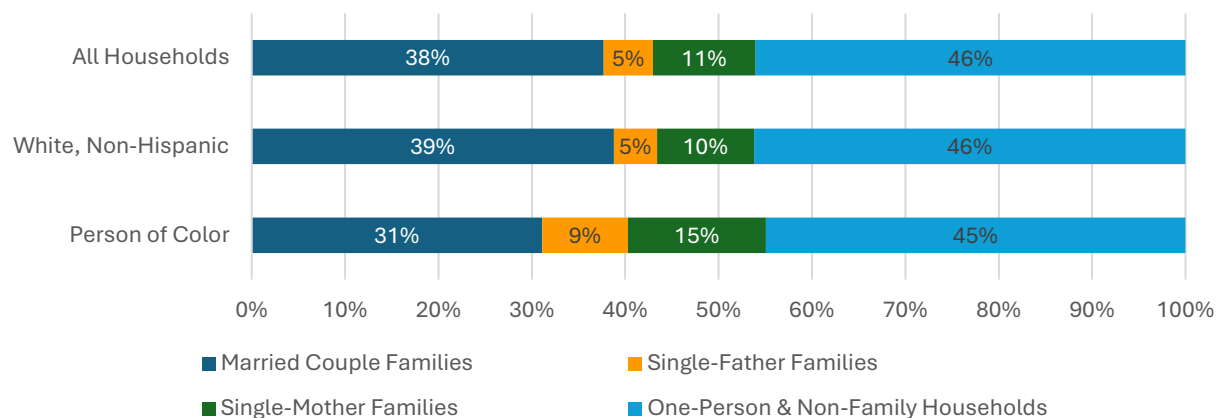
Figure 25. Distribution of Households by AMI and Race/Ethnicity, 2021



Source: City of Spokane; US HUD, 2017-2021 Comprehensive Housing Affordability Strategy (CHAS) (Table 1)

When looking at the composition of households by race, there is almost an equal percentage of White Non-Hispanic households and BIPOC households that consist of families. **Nearly a quarter of BIPOC households are a single-parent family**, compared to 15% of White, Non-Hispanic households. See [Figure 26](#)

Figure 26. Household Type by Race/Ethnicity of Householder, 2023



Source: City of Spokane; U.S. Census Bureau, Average Household Size of Occupied Housing Units by Tenure (2023). American Community Survey, ACS 5-Year Estimates Detailed Tables, Tables B11001A-I

3.5 Access to Fair Housing

The Fair Housing Act of 1968 protects people seeking homes from discrimination based on race, color, national origin, religion, sex, familial status and disability. The Fair Housing Act requires that recipients of federal housing and urban development funds take meaningful action to address housing disparities caused by both public and private actions. This includes undoing segregated living patterns, transforming racially and ethnic concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

The City of Spokane adopted the [2024-2027 Fair Housing Plan](#), developed by the Northwest Fair Housing Alliance which works to is to eliminate housing discrimination and to ensure equal housing opportunity for the people of Washington State through education, counseling and advocacy. The Fair Housing Plan outlines extensive data and reporting on fair housing impediments, as well as providing feedback from community members and recommendations for policy changes.⁴²

The Fair Housing Plan outlined the following complaint data for Spokane, which was obtained from HUD and the Washington State Human Rights Commission. Between July 2019 and March 2024, at least 62 complaints filed with HUD and/or the WSHRC originated in Spokane. [See Table 4](#)

Table 4. Fair Housing Complaints, 2019-2024

Complaint	Percent of complaints
Disability-based housing discrimination	71% (33 complaints) 11 complaints as disability with one or more secondary protected classes (race, sex, familial status, retaliation)
Familial Status	12%
Sex and Sexual Orientation & Gender Identity	11%
Race complaints	5%
National Origin complaints	3%
Marital Status	1.6%

The 2024 Fair Housing Plan provides more details on fair housing issues, contributing factors, and protected class groups adversely impacted.

⁴² City of Spokane. (2024a). *Spokane Fair Housing Plan*.
<https://static.spokanecity.org/documents/chhs/plans-reports/planning/2024-draft-fair-housing-plan.pdf>

4. Disparities in Access and Wellbeing

Where people can live is a determination of several factors related to quality of life and wellbeing such as access to services, education, environmental health outcomes, and life expectancy. It is important to recognize where in the city different populations can access housing and how that adversely impacts their lives. Examining these downstream effects of housing location and choice can help identify policies that may cause a racially disparate impact.

4.1 Neighborhood Access

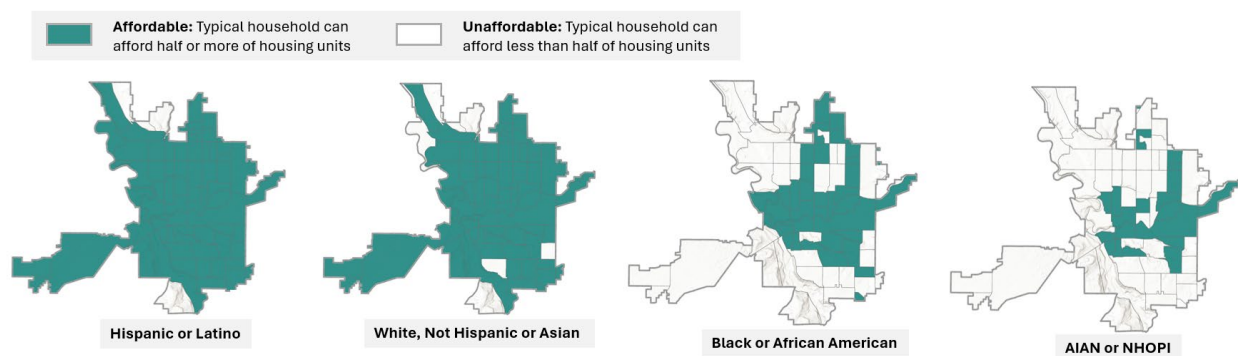
Neighborhood access is defined by the WA Department of Commerce as the ability of a household to access housing in a specific neighborhood.⁴³ Neighborhood access can be assessed by comparing household incomes to housing costs. Analyzing the areas of the city accessible by racial groups based on patterns of household income can help to identify areas of the city that are functionally inaccessible to different racial groups and reflect on how that accessibility has changed over time. Comparing the outcome of this analysis across racial groups can demonstrate whether land use policies are in effect creating a racially disparate impact or are exclusionary.

Access to Rental Housing

The analysis evaluated the areas in which the typical household can afford half or more of housing units (affordable) to areas in which they can afford less than half of housing units (unaffordable). In 2023, Hispanic or Latino, White Non-Hispanic, and Asian households had the broadest ability to access rental housing across Spokane based on household income and housing costs. **The ability of Black, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander households to access rental housing was considerably more limited, with access generally limited to Central and Northeast Spokane. See Figure 27**

Figure 27. Access to Rental Housing, 2023

Ability of a household to access rental housing by race/ethnicity, City of Spokane, 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, ACS 5-Year Estimates, 2023. Median Household Income in the Past 12 Months, Table B19013. Selected Housing Characteristics, Table DP04.

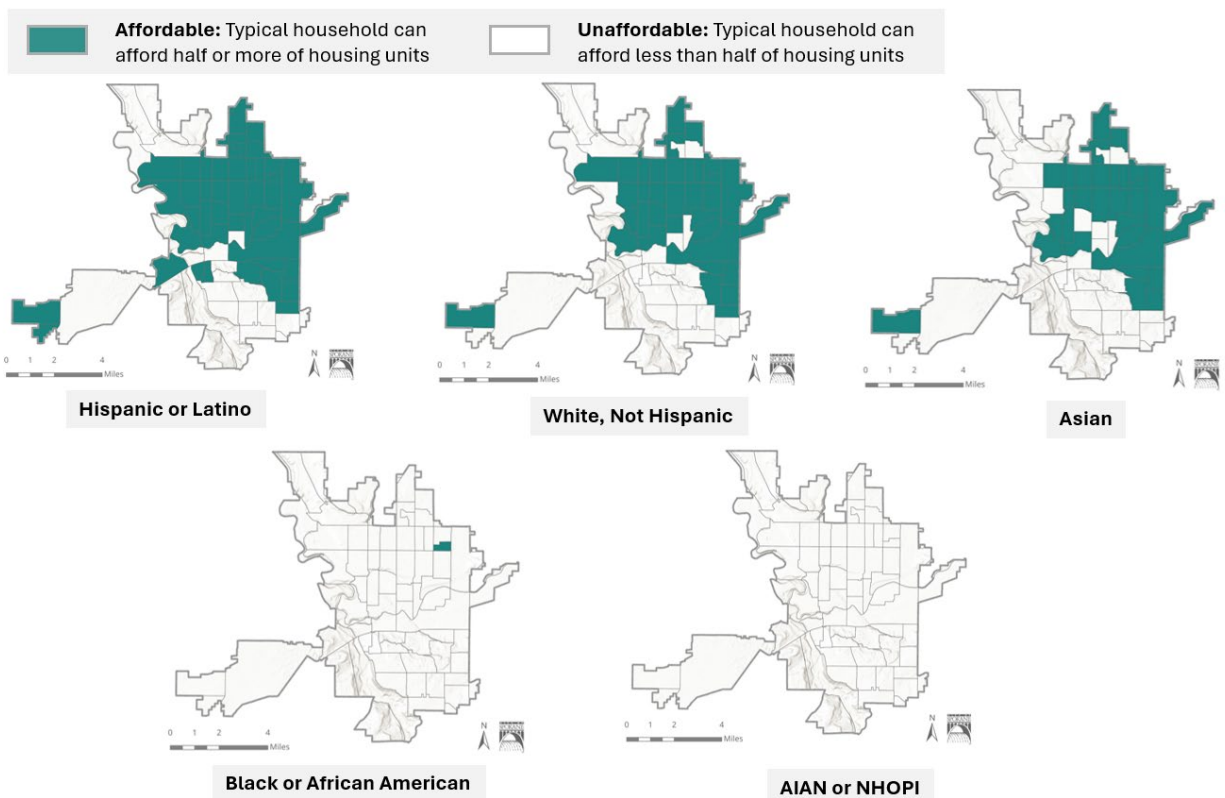
⁴³ Commerce, 2023a

Access to Homeownership

Similar to rental housing, Hispanic or Latino, White Non-Hispanic, and Asian households have the broadest ability to access homeownership across Spokane based on household income and housing costs, though it is more limited than access to rental housing. In comparison, **the ability of Black or African American, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander households to access homeownership based on household income and housing costs is severely limited across large portions of the city.** South Spokane had the least accessibility for homeownership of all races, but no area south of I-90 was affordable for a typical Black, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander household. See Figure 28

Figure 28. Access to Homeownership, 2023

Ability of a household to access homeownership by race/ethnicity, City of Spokane, 2023

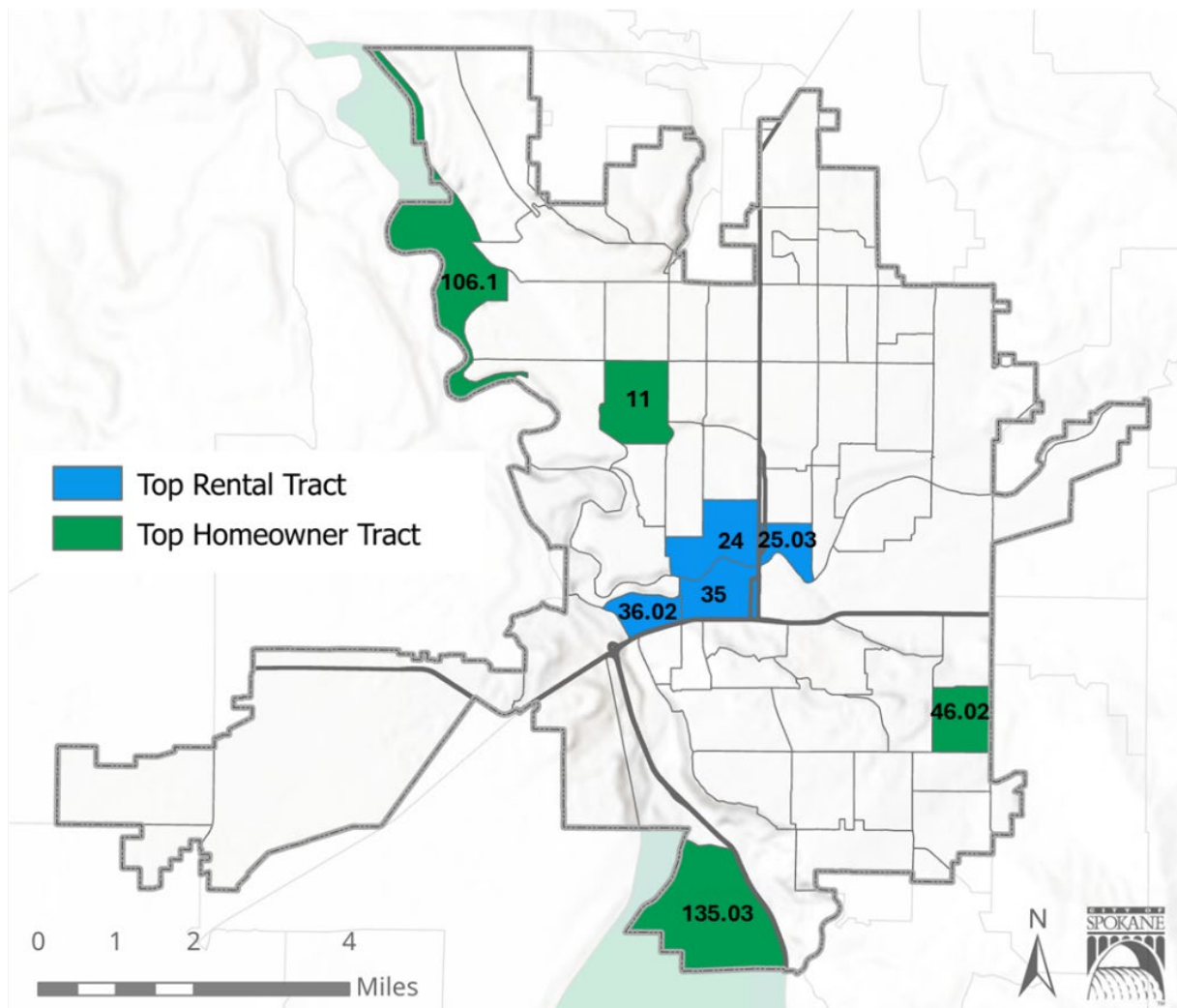


Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, ACS 5-Year Estimates, 2023. Median Household Income in the Past 12 Months, Table B19013. Selected Housing Characteristics, Table DP04.

Rental and Homeownership Rates by Census Tract

Looking at the highest concentrations of households renting and owning by Census Tracts, the Census Tracts with the highest percentage of renters are in Central Spokane, in portions of the Browne's Addition, Riverside, Emerson/Garfield, West Central, and Logan neighborhoods, while the Census Tracts with the highest homeownership rates are on the South Hill and in Northwest Spokane, specifically the Northwest, Audubon-Downriver, Lincoln Heights, and Latah/Hangman neighborhoods. Census Tract 25.03, which covers Gonzaga University, has the highest rental rate in the city and reflects the large student population. See Figure 29

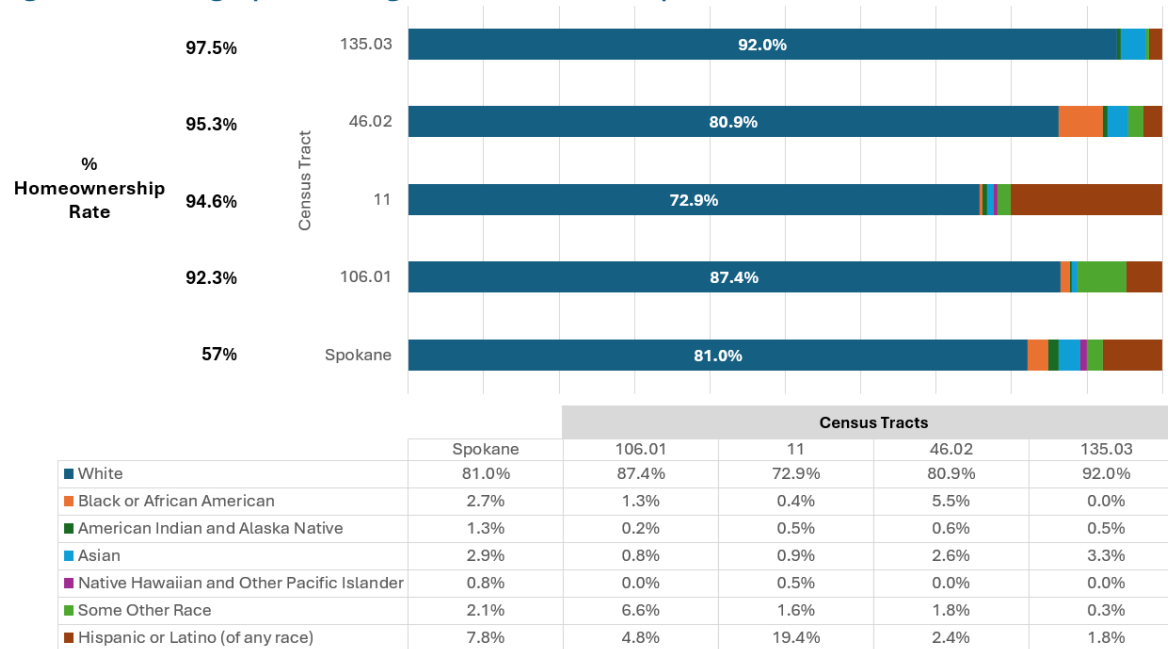
Figure 29. Highest Homeownership/Rental Census Tracts, 2021



Source: City of Spokane; US HUD, 2017-2021 Comprehensive Housing Affordability Strategy (CHAS)(Table 1)

Looking at the demographics of the Census Tracts with the highest rental and homeownership rates, there is a racial disparity in the representation of households. **For the Census Tracts with the highest homeownership rates, 3 of 4 census tracts have a higher percentage of White population than citywide.** Some Census Tracts also had higher rates of BIPOC populations, suggesting a concentration of racial groups for homeownership. These percentages, however, are still lower than the percentage of White population in the census tracts. **Native Hawaiian and Other Pacific Islander and American Indian and Alaska Native households are underrepresented in all the highest homeownership Census Tracts.** Census Tract 11, in Audubon/Downriver, had the most diversity in homeownership in both racial groups and household incomes. [See Figure 30](#)

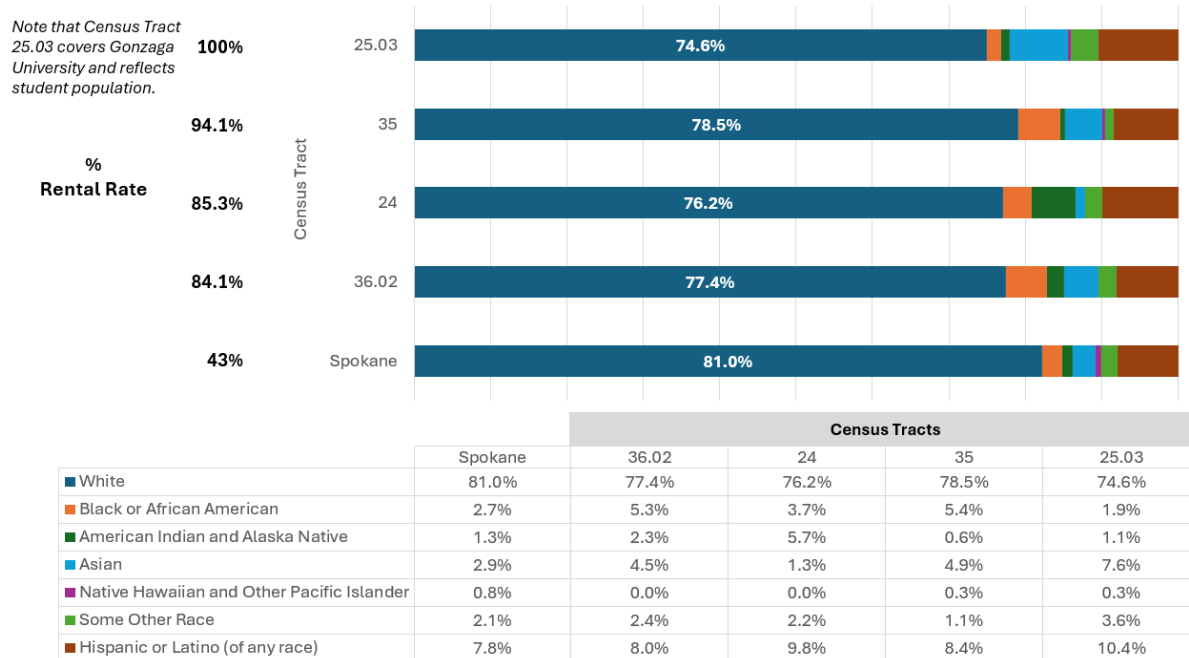
Figure 30. Demographics of Highest Homeownership Census Tracts, 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table DP05

All of the Census Tracts with the highest rental rates have a lower percentage of White population than the city level. **These Census Tracts all had at least two BIPOC racial groups overrepresented compared to the city level.** American Indian and Alaska Native households were overrepresented in half of the highest rental Census Tracts. [See Figure 31](#)

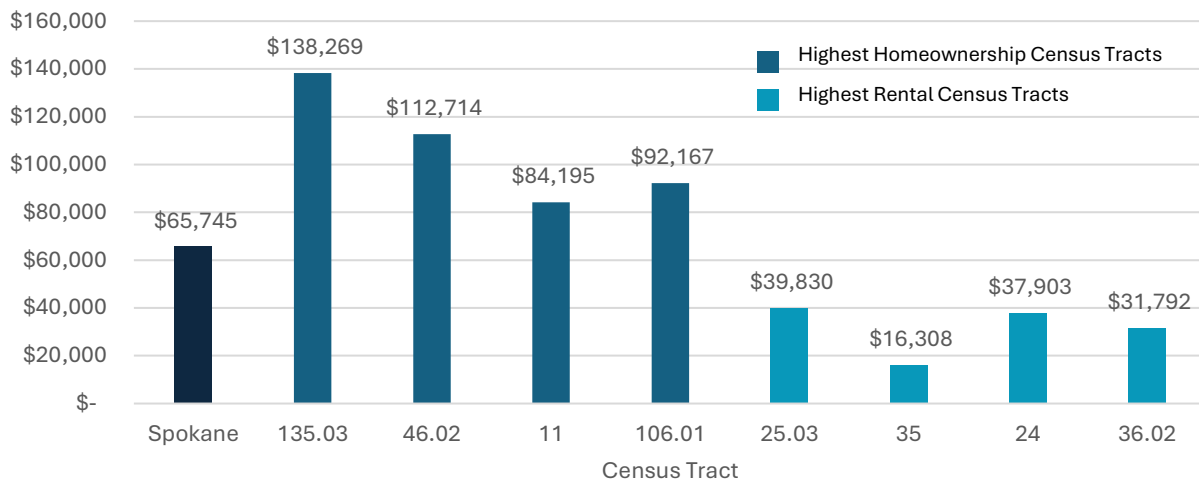
Figure 31. Demographics of Highest Rental Census Tracts, 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table DP05

All highest homeownership Census tracts had higher median household incomes than the city, and all highest rental tracts had lower median household incomes than the city overall. **The range between the highest majority homeowner household income and the lowest majority renter household income was \$121,961, meaning the median household income of Census Tract 135.03 was eight times greater than that of Census Tract 35. See Figure 32**

Figure 32. Median Household Incomes of Highest Homeownership & Rental Census Tracts, 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. American Community Survey, 2023: 5-Year Estimates, Table DP03

4.2 Educational Access

The quality of access to education can be impacted by where families can access housing. Assessment of educational access by race includes racial representativeness of children in higher performing schools compared to lower performing schools and locations of higher performing schools relative to racial composition of the surrounding neighborhood.⁴⁴

Kindergarten Readiness

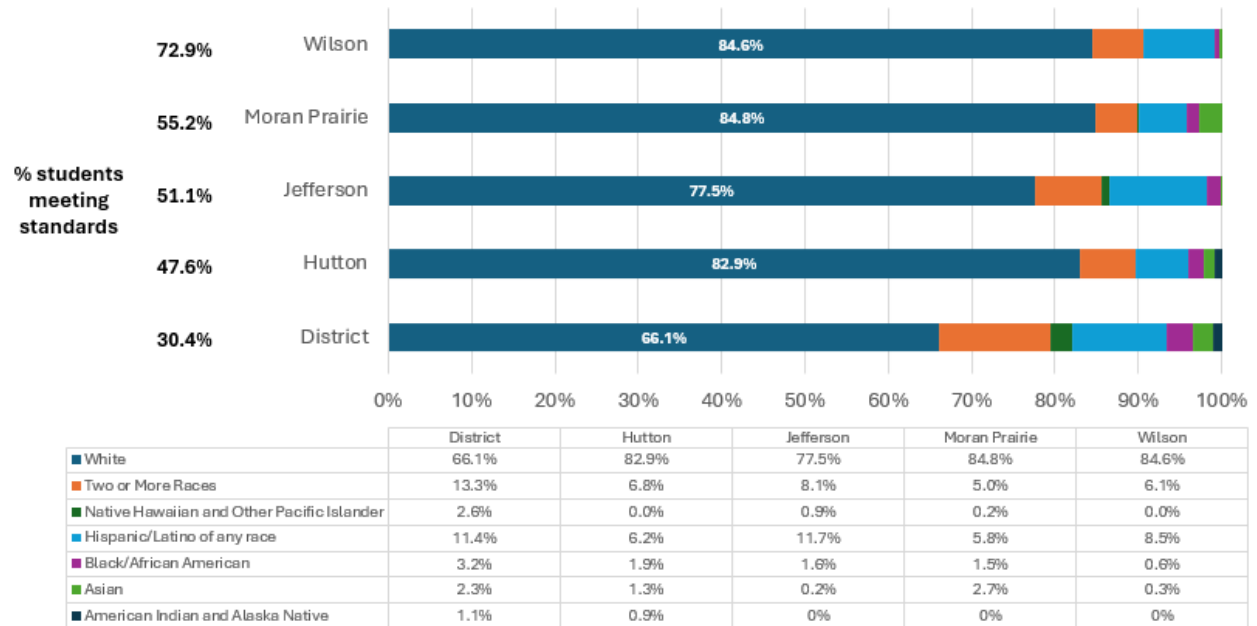
To document kindergarten readiness, six areas of development are assessed by the Washington State Office of the Superintendent of Instruction: social-emotional, physical, cognitive, language, literacy, and mathematics. Children who demonstrate readiness in all six areas have a greater likelihood of success in kindergarten and beyond. These assessments largely reflect a student's experiences and learning before entering public school (rather than school performance).

District wide demographics for Spokane Public Schools (SPS) provide a reference point. **The top kindergarten readiness schools in SPS have higher percentage of White students compared to the district overall. Hispanic, Black, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander students are majority under-represented in the top schools compared to the district overall.** Two schools had higher representation of Asian and Hispanic/Latino students than the district overall. **See Figure 33.** Comparatively, the lowest

⁴⁴ Commerce, 2023a

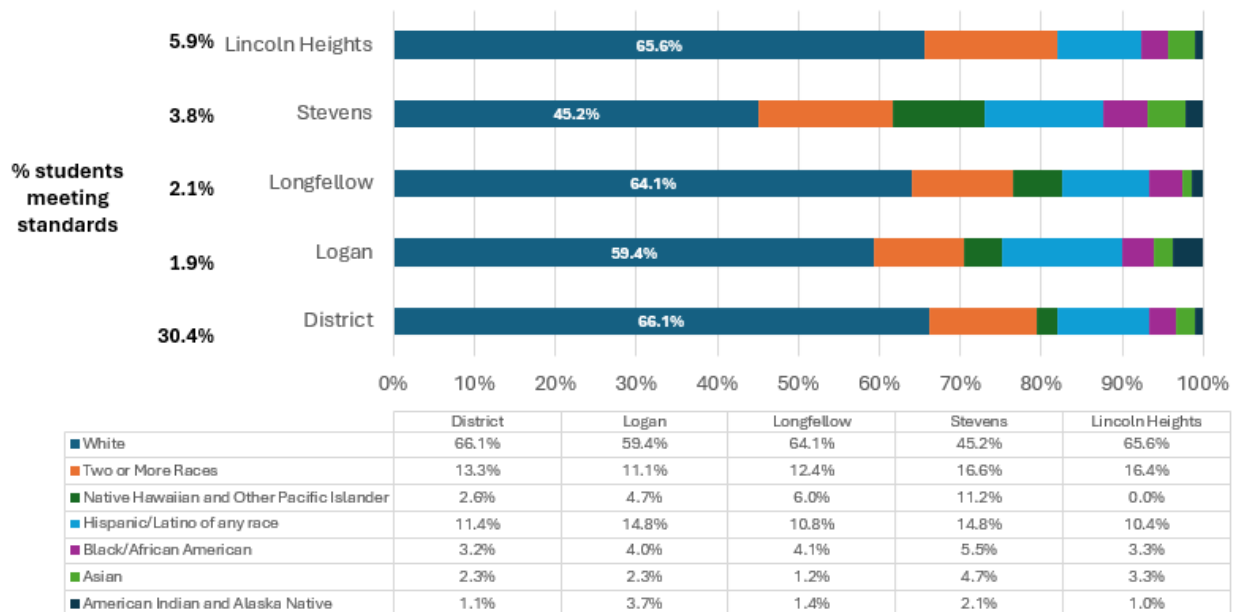
kindergarten readiness schools had a lower percentage of White students compared to the district overall. BIPOC students match the district demographics or are over-represented compared to the district overall. See Figure 34

Figure 33. Demographics of Top Four Kindergarten Readiness Schools, Spokane Public Schools, 2022-2023



Source: City of Spokane; Washington OSPI. Report Card Kindergarten Readiness 2022-23 School Year. https://data.wa.gov/education/Report-Card-WaKids-2022-23-School-Year/3ji8-ykgj/about_data

Figure 34. Demographics of Lowest Four Kindergarten Readiness Schools, Spokane Public Schools, 2022-2023

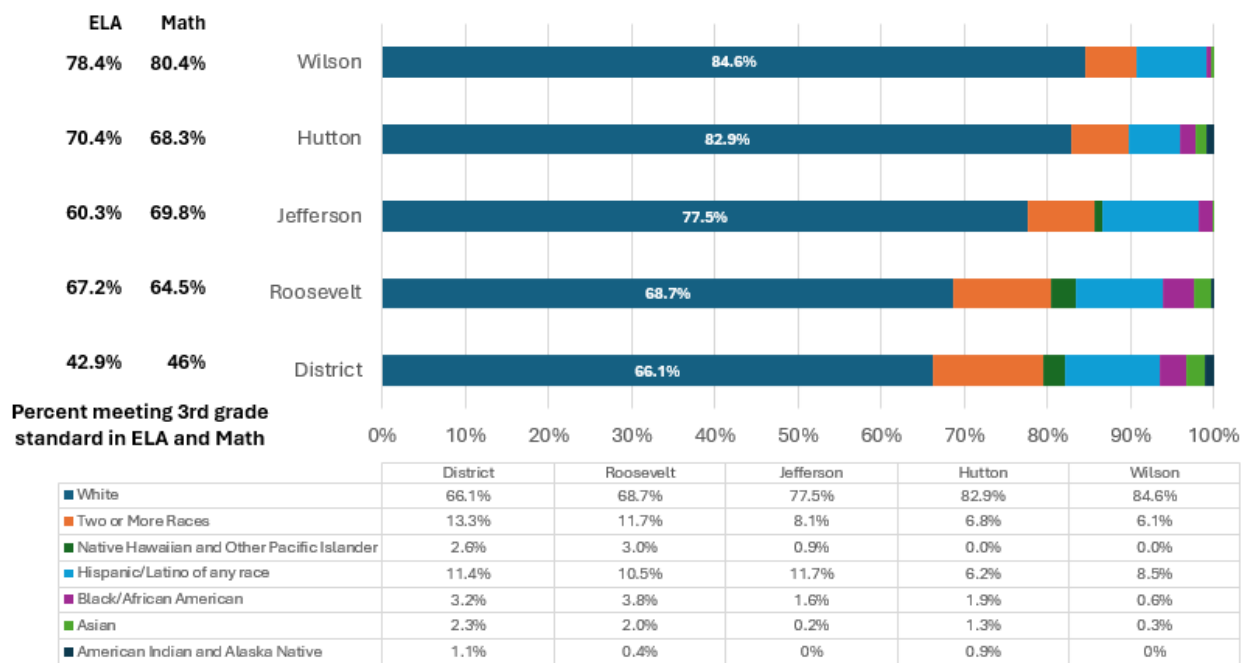


Source: City of Spokane; Washington OSPI. Report Card Kindergarten Readiness 2022-23 School Year. https://data.wa.gov/education/Report-Card-WaKids-2022-23-School-Year/3ji8-ykgj/about_data

Third Grade ELA and Mathematics Assessments

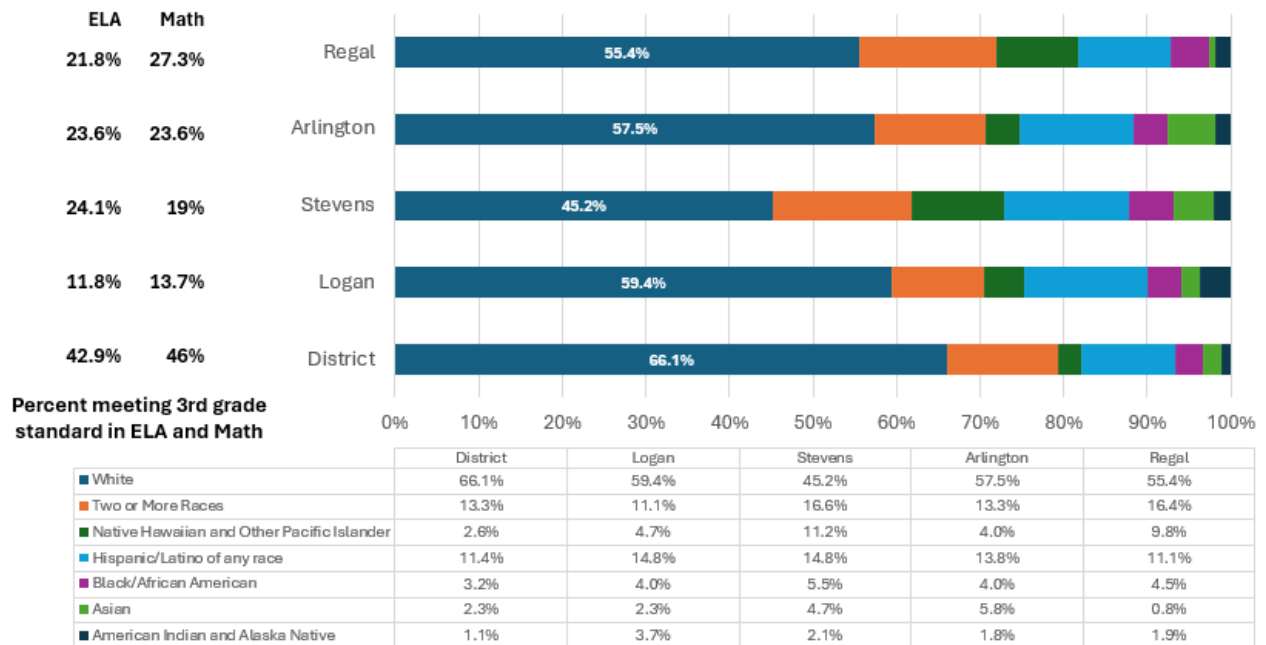
SPS offers assessments at 3rd grade in English Language Arts (ELA) and Mathematics, which helps to reflect school performance and resources available to the students while at school, as well as in homes and neighborhoods. **At the top performing elementary schools by 3rd Grade Assessment, White students are overrepresented compared to the district overall, while BIPOC students are majority underrepresented at these schools**, particularly American Indian and Alaska Native and Native Hawaiian and Other Pacific Islander students. **See Figure 35.** At the lowest performing four elementary schools, BIPOC students match the demographic rates of the district or are over-represented. White students are below the district level for all the lowest performing schools. **See Figure 36**

Figure 35. Demographics of Top Four Elementary Schools by 3rd Grade Assessment, Spokane Public Schools, 2022-2023



Source: City of Spokane; Washington OSPI. Report Card Assessment Data 2022-23 School Year. https://data.wa.gov/education/Report-Card-Assessment-Data-2022-23-School-Year/xh7m-utwp/about_data

Figure 36. Demographics of Lowest Four Elementary Schools by 3rd Grade Assessment, Spokane Public Schools, 2022-2023

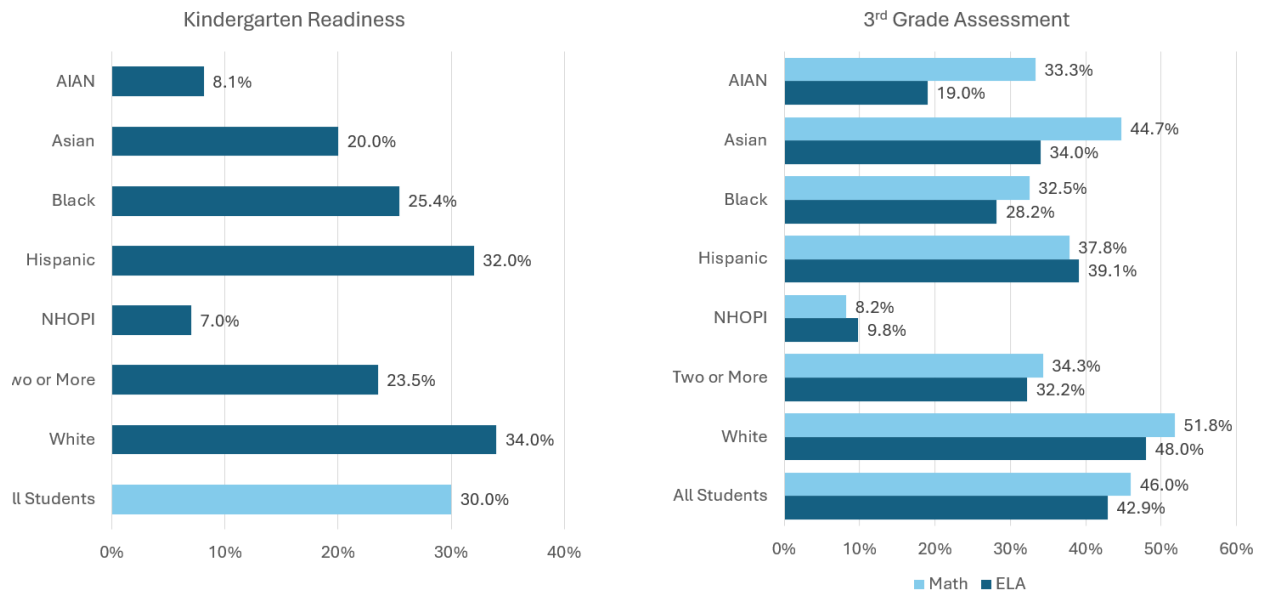


Source: City of Spokane; Washington OSPI. Report Card Assessment Data 2022-23 School Year. https://data.wa.gov/education/Report-Card-Assessment-Data-2022-23-School-Year/xh7m-utwp/about_data

Districtwide Assessments

District wide readiness rates for Native Hawaiian and Other Pacific Islander, American Indian and Alaska Native, Asian, Black, and multiracial students in Spokane Public Schools were below the district overall, and below Hispanic and White students. For the 3rd grade assessment rates, all students of color were below the district overall and below White students in ELA. Rates for math were lower for all students of color other than Asian students, which was higher than the district but still lower than White students. Disparities in achieving grade-level standards are seen particularly in NHOPi students, who increased the least in meeting standards from Kindergarten to 3rd grade. [See Figure 37](#)

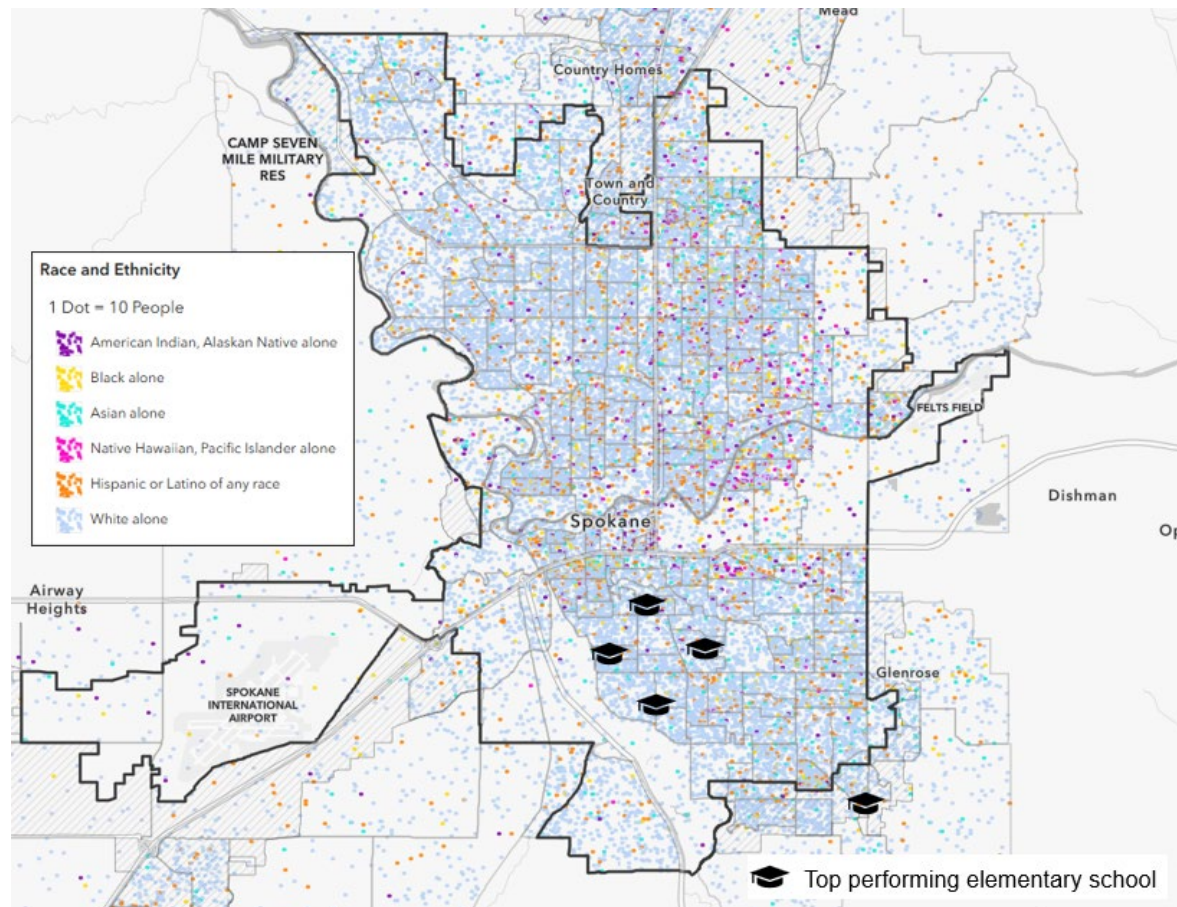
Figure 37. Demographics of Student Assessments, Spokane Public Schools, 2022-2023



Sources: City of Spokane; Washington OSPI. Report Card Kindergarten Readiness 2022-23 School Year. https://data.wa.gov/education/Report-Card-WaKids-2022-23-School-Year/3ji8-ykgj/about_data. Washington OSPI. Report Card Assessment Data 2022-23 School Year. https://data.wa.gov/education/Report-Card-Assessment-Data-2022-23-School-Year/xh7m-utwp/about_data

When considering the disparities in educational access, all top 5 elementary schools are located south of I-90 on the South Hill. While the school boundaries cover larger areas compared to census tracts, **there is a disparity in access to quality education for populations living north of I-90, compared to those living south of I-90.** The racial distribution map shows a higher concentration of White population in south Spokane, with non-White populations more concentrated in Central and Northeast Spokane. See Figure 38

Figure 38. Location of Higher Performing Schools Relative to Racial Composition



Source: City of Spokane; Spokane Climate Vulnerability Index; Washington OSPI, 2022-2023

4.3 Park Access

Spokane Parks produced the Spokane Parks and Natural Lands Master Plan in 2021 to guide the Parks and Recreation Department's focus and direction over the next ten years.⁴⁵ Outlined in the Parks Master Plan, parks are distributed throughout the city to provide 89% of households a publicly available park within a comfortable walking distance. Although serving the smallest number of households, City Council District 2 (South Spokane) has approximately 1,000 more park acres than District 1 (Northeast Spokane) and 900 more acres than District 3 (Northwest Spokane). District 2 holds the most individual parks – 43 park properties compared to 28 in both District 1 and 2. District 2 also holds nine distinct natural lands properties compared to one in District 1 and four in District 3, meaning that residents in this district are afforded more access to recreation in a natural setting. District 1 has the least amount of park acreage, resulting in more competition and use of park amenities. [See Table 5](#)

⁴⁵ City of Spokane. Spokane Parks and Recreation Department (Spokane Parks). (2021). *Spokane Parks and Natural Lands Master Plan*. <https://my.spokanecity.org/parksrec/master-plan/>

Table 5. Spokane Parks and Households per City Council District

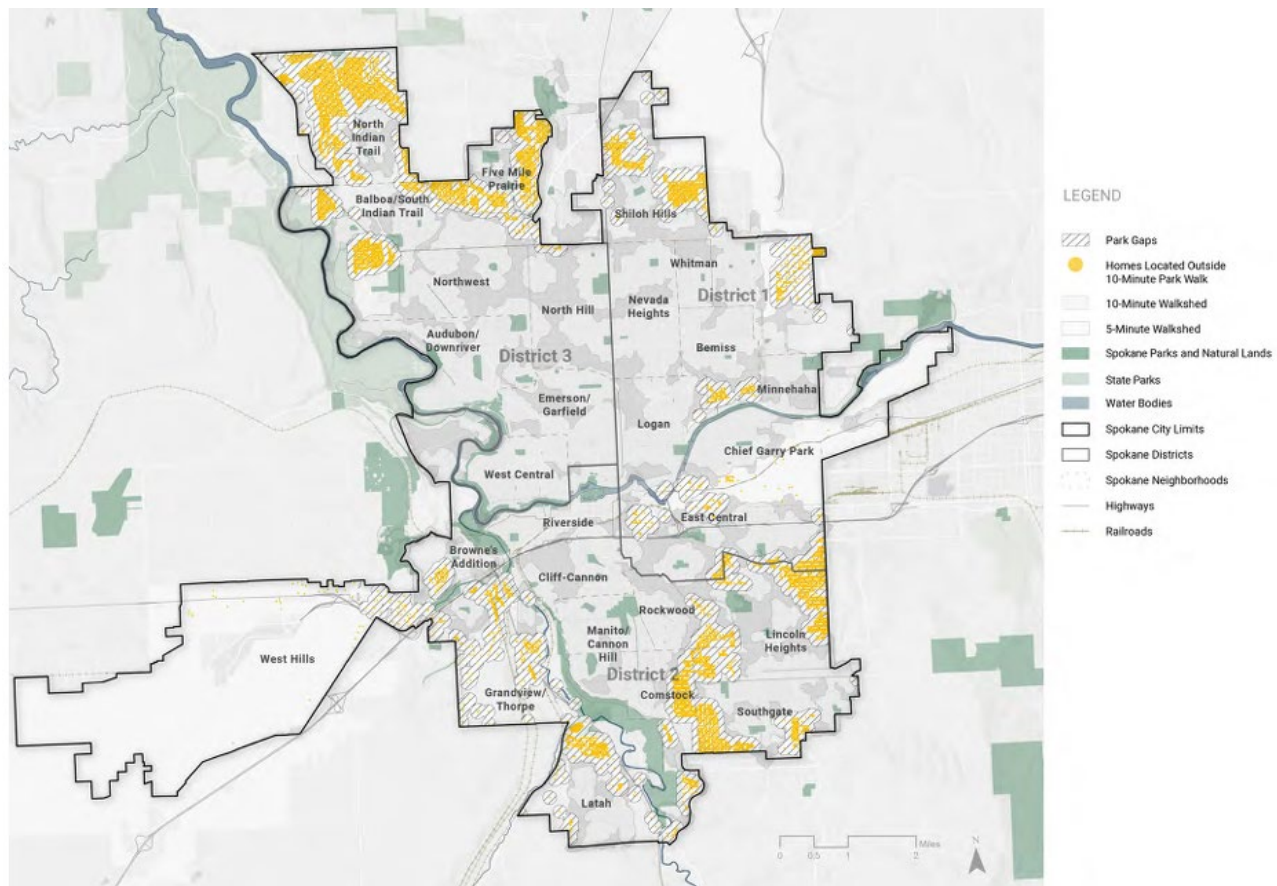
DISTRICT	HOUSEHOLDS	PARK ACRES	PARK PROPERTIES	PARK ACRES PER HOUSEHOLD
District 1	32,267	458	28	0.014
District 2	29,380	1,681	43	0.057
District 3	33,466	748	28	0.02
Total	95,113	3,863	105	0.04

Source: City of Spokane GIS data 2021

Source: Spokane Parks Master Plan, 2021

The Parks Master Plan outlines that larger amenities like neighborhood and regional parks are not distributed equally, and are more closely connected to higher income and homeownership areas. See [Figure 39](#). This suggest that not just the presence of amenities like parks is important, but the quality and investment of the amenities could contribute to overall outcomes when considering amenities and infrastructure.

Figure 39. Spokane Parks Walkshed Park Gaps



Source: Design Workshop Analysis 2021, City of Spokane GIS data 2021, Spokane County GIS Data

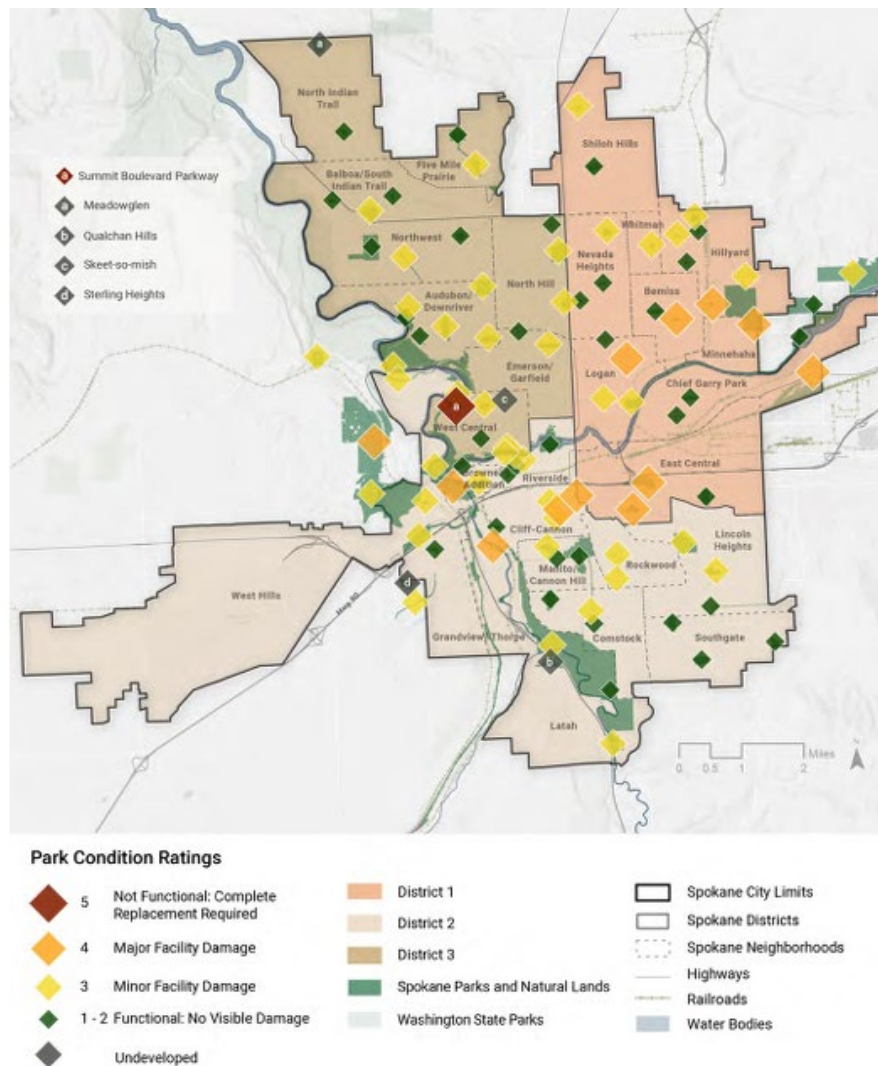
Source: Spokane Parks Master Plan, 2021

The following outlines the percentage of households outside 10-minute walk access to a City-owned park:⁴⁶

- **District 1** has 15% of its households without a park within walking distance (equates to 4,720 households). They have a larger percentage of households with parks within walking distance of their homes, but the smallest total acreage of parks. According to public feedback, the quality of some of these parks is less desirable and that they are used less. This indicates that walkshed is not the only measure of park need. The majority of parks with major facility damage are in District 1. [See Figure 40](#)
- **District 2** has 18% of its households without a park within walking distance (equates to 7,403 households). Many of their parks are larger natural areas or larger acreage parks. The large number of households without park access indicates a need for better connections between park spaces and to residential areas of the district, particularly in the Lincoln Heights and Southgate neighborhoods. District 2 has more park acres per household than both Districts 1 and 3 combined.
- **District 3** has 14% of the district's households are without a park within a 10-minute walk of their home (equates to 4,232 households). District 3 parks appear to be in the best overall shape when compared to other districts. Investments on City-owned property within the northwest portion of the district will improve park access for residents in this quickly growing part of the city.

⁴⁶ Spokane Parks, 2021

Figure 40. Spokane Parks Condition Ratings



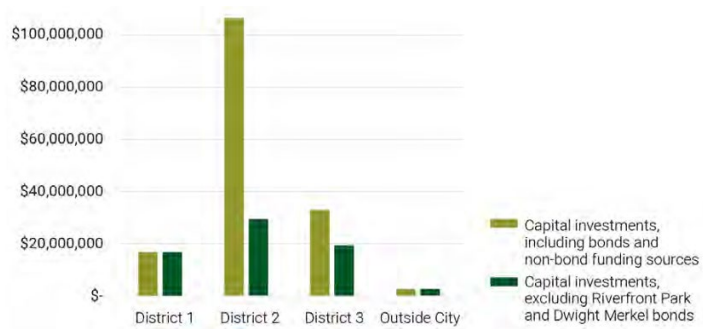
Source: City of Spokane Parks & Recreation, City of Spokane GIS data 2021, Spokane County GIS Data

Source: Spokane Parks Master Plan, 2021

When looking at the distribution of spending across Spokane's three council districts, there is a disparity in various parts of the city.⁴⁷ Park investments made in District 2 are more than six times that of District 1 and three times greater than District 2 over a 22-year period; however, this also includes major investment in Riverfront Park. To account for this, shown in dark green are capital investments per district with the exclusion of Riverfront Park and Dwight Merkel Sports Complex. This data depicts greater spending in District 2 between 1999 and 2021, with less spending in Districts 1 and 3. When excluding bond initiatives, capital investment spending data by council district between 2017 and 2021 illuminates that investments made in District 2 have still exceeded that of Districts 1 and 3 by 200 percent or more than \$4 million. [See Figure 41](#)

⁴⁷ Spokane Parks, 2021

Figure 41. Capital Investments by Council District, 1999-2021



Source: City of Spokane. History of Park Investments, 1999-2021

4.4 Environmental Health Disparities

Where residents can access housing also determines what pollution and other environmental hazards they are exposed to. The Washington State Department of Health (DOH) compiles information on environmental health and hazard risk information for each census tract in Washington state in the Environmental Health Disparities Map.⁴⁸ The dataset identifies which areas are most impacted by environmental pollution and can help determine where more attention needs to be placed in order to address and reduce the specific pollution, societal, and health harms affecting people.

Environmental health disparities are defined as the increasing combination of factors (social, medical, climate, and environmental) that create inequities in health, which cause more sickness, disease, pollution, and other problems to Washington communities with more economic need, specifically providing data on exposure to:

- Diesel exhaust PM2.5 emissions
- Ozone Concentration
- Particulate matter (PM2.5)
- Toxic releases from facilities
- Proximity to heavy traffic roadways

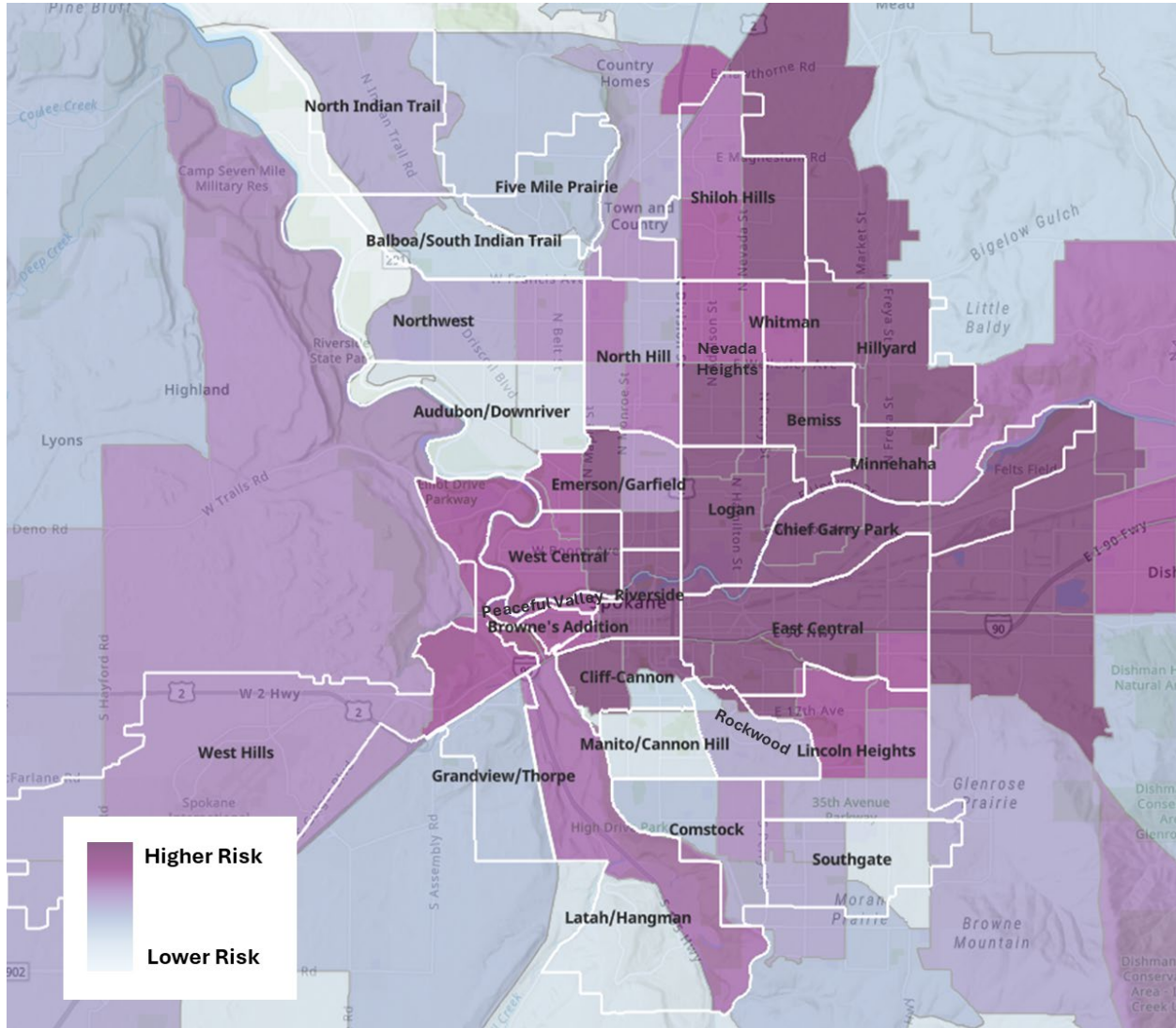
Almost one-third of Spokane's population (32.7%) live in an area that is considered extremely environmentally overburdened, ranking 10 out of 10 on the Washington State DOH map comparing environmental health disparities across the state.⁴⁹ The highest-ranking census tracts for exposure to environmental harms are along the I-90 corridor, particularly East Central, and Northeast Spokane, as well as the lower South Hill. According to DOH, Spokane has higher rates of death from cardiovascular disease and lower birth weights than much of the state, especially in central

⁴⁸ Washington State Department of Health. (2022). Environmental Health Disparities Map – Version 2.0. <https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map>

⁴⁹ City of Spokane. (2024). *Spokane Climate Impacts and Climate Justice Memo*. <https://static.spokanecity.org/documents/planspokane/climate-planning/spokane-climate-impacts-and-climate-justice-memo-2025-03-07.pdf>

neighborhoods in the city, like downtown (Riverside), West Central, and East Central.⁵⁰ Other areas in the northwest and towards the edge of Spokane experience much lower environmental health risks. See Figure 42

Figure 42. Environmental Health Disparities



Source: WA DOH, Environmental Health Disparities Map

Vulnerability to environmental harms is represented by indicators of socioeconomic factors and sensitive populations for which there is clear evidence that they may affect susceptibility or vulnerability to an increased pollution burden.⁵¹ Indicators in socioeconomic factors measure population characteristics that modify the pollution burden itself, including:

- No high school diploma;

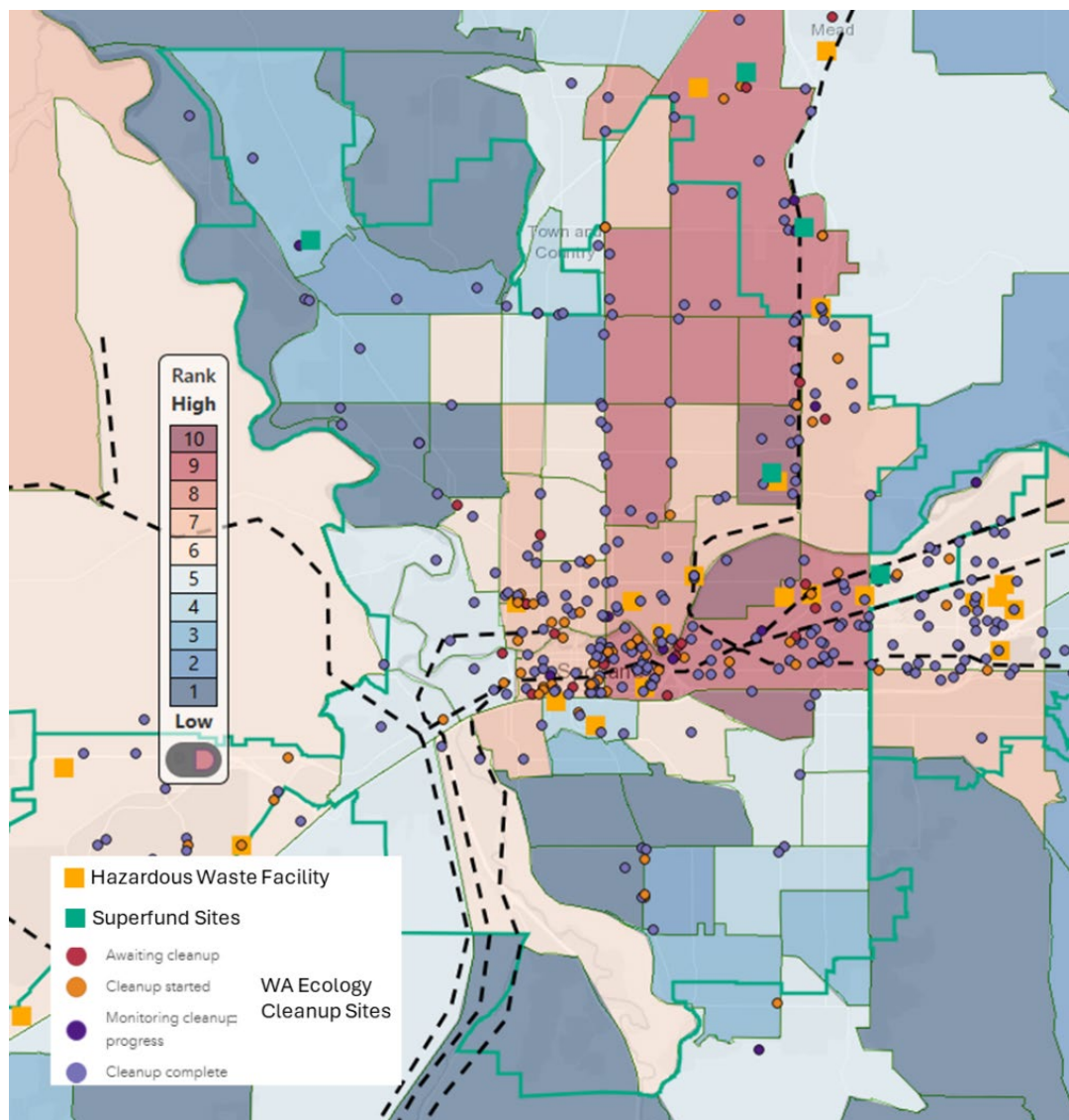
⁵⁰ City of Spokane, 2024b. *Spokane Climate Impacts and Climate Justice Memo*.

⁵¹ WA DOH, 2022

- People of color (race/ethnicity);
- Population living in poverty;
- Primary language other than English;
- Transportation expense;
- Cost-burdened; and
- Unemployment.

Residents in Spokane who are more vulnerable to hazards and pollution based on socioeconomic factors are more likely to be exposed to hazardous facilities and pollution from transportation corridors including railroads and highways like I-90 and US 395. This is primarily concentrated in neighborhoods in Central and Northeast Spokane. See Figure 43

Figure 43. Socioeconomic Factors and Hazardous Facility Locations

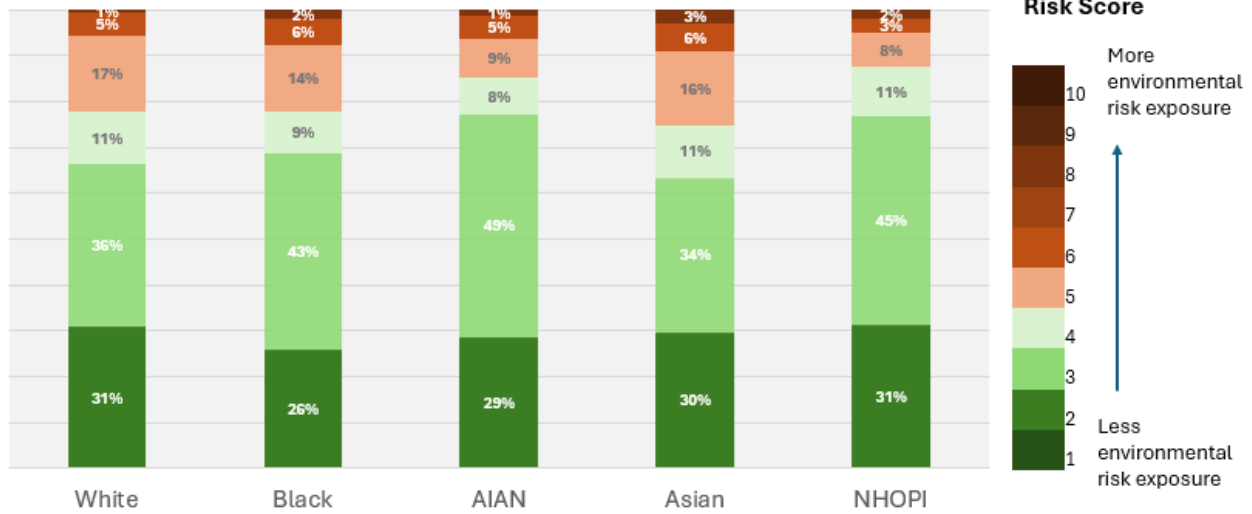


Source: WA DOH, Environmental Health Disparities Map

Toxic releases from facilities refers to chemicals emitted into the air from industrial facilities. These hazardous pollutants, including hazardous waste and emissions, are monitored by the EPA in their Toxic Release Inventory and measured for each census tract. **In the city of Spokane in 2020, Asian households had a higher proportion of people living with more severe exposure to toxic releases from facilities compared to other racial groups. See Figure 44**

Figure 44. Exposure to Toxic Releases from Facilities, 2020

**Exposure to toxic releases from facilities (RSEI Model),
City of Spokane, 2020**

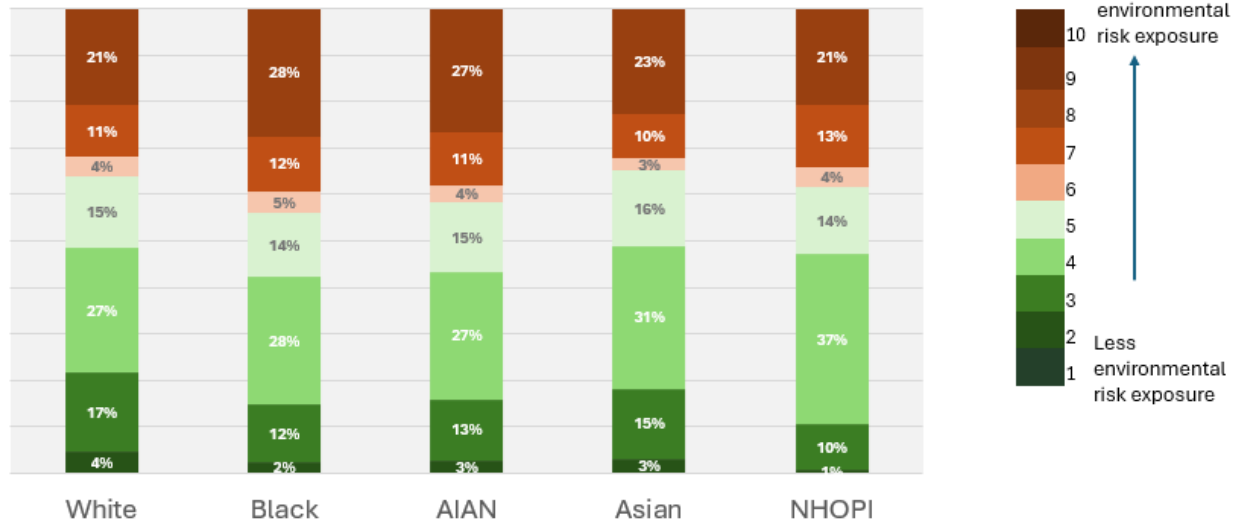


Source: City of Spokane; US EPA EJ Screen 2021, based on Risk Screening Environmental Indicator (RSEI) 2018-2020 3-year average

Exposure to high levels of pollution affects residents' health. Traffic volume and density greatly impact health conditions and are associated with cardiovascular diseases and cancers. This data was based on traffic along Washington highways and collected for each census tract. The chart below presents the exposure to air pollutants from roadways for each racial group based on where those populations live. **Black, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander households have a higher proportion of people living with more severe exposure to traffic air pollution compared to White and Asian households. See Figure 45**

Figure 45. Air Pollution Exposure, 2019

Air pollution exposure from proximity to heavy traffic roadways, City of Spokane, 2019.



Source: City of Spokane; Washington Tracking Network, Washington State Department of Health, 2019 roadway traffic data from WSDOT

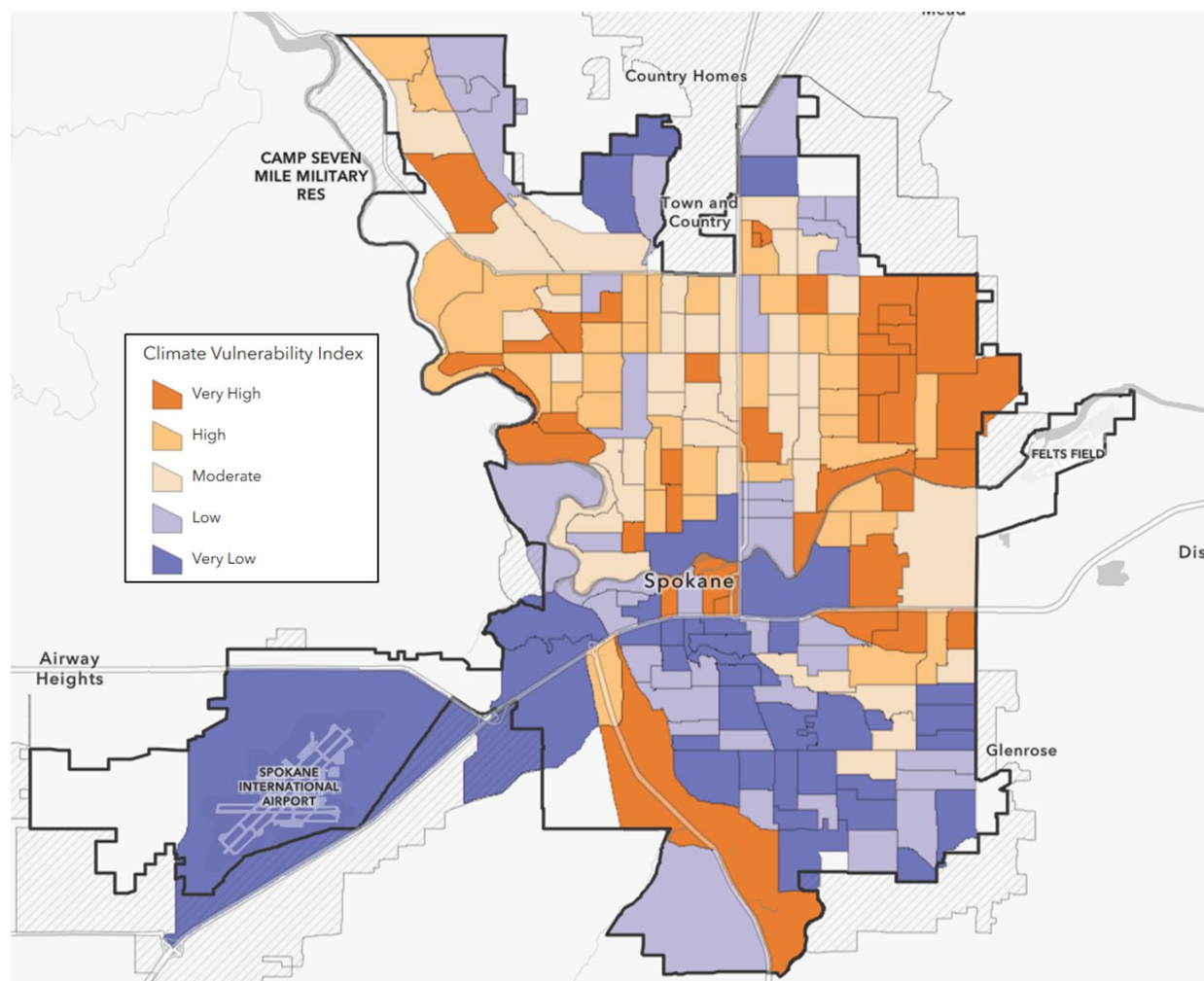
4.5 Climate Vulnerability

The Spokane Climate Vulnerability Index (CVI), prepared as part of the City's climate planning efforts in the comprehensive plan, helps identify areas, people, and infrastructure in Spokane that are more at risk from changing climate hazards like extreme heat, wildfire risks, and health issues caused by heat and smoke.⁵² Climate vulnerability is defined as the combination of exposure to a changing climate, the health and environmental sensitivity to a changing climate, and the capacity of the community and place to cope with the impacts of a changing climate. The CVI combines over 30 indicators of climate vulnerability and identifies which census block groups are more or less vulnerable to extreme heat or extreme precipitation, relative to other areas in the city of Spokane.

Like the DOH Environmental Health Disparities Map, **the Spokane Climate Vulnerability Index identifies that neighborhoods in NE Spokane have the highest level of climate vulnerability**, particularly Hillyard, Bemiss, Minnehaha, and East Central. [See Figure 46](#)

⁵² City of Spokane. (2025). *Spokane Climate Vulnerability Index*.
<https://storymaps.arcgis.com/collections/f6e4fae1a4eb400bab2c236ce63b75da>

Figure 46. Spokane Climate Vulnerability Index

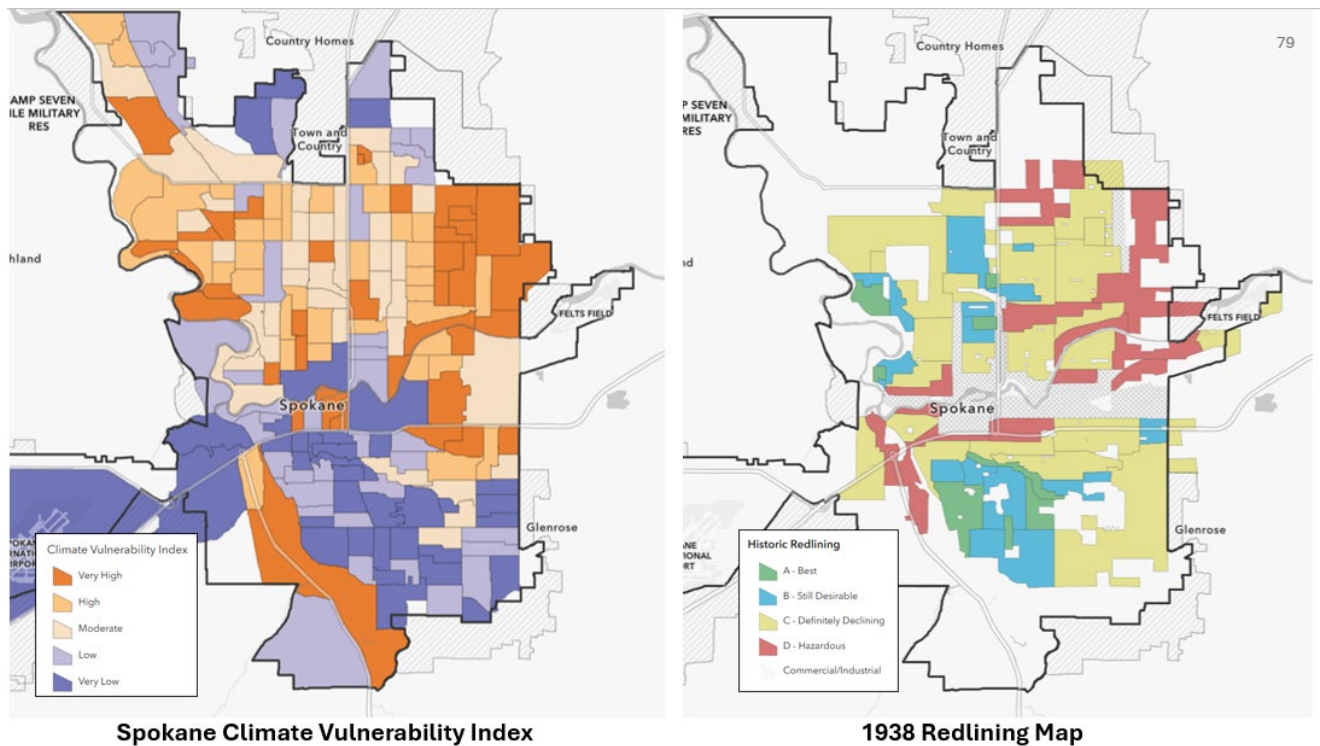


Source: Spokane Climate Vulnerability Index, 2025

Redlining led to a legacy of disinvestment in communities resulting in reduced tree canopy and green spaces, lower-quality housing, and increased impervious surfaces, which are hardened areas like roads, roofs, and parking lots that prevent water from soaking into the ground. This increases stormwater runoff and pollution, decreases the viability of trees, leads to higher temperatures, and contributes to other environmental and human health defects. Redlined areas were subjected to practices like highway construction, railroads, toxic waste siting, and other uses that have created health disparities today. This exacerbates climate risks and has left communities disproportionately vulnerable to climate change impacts like extreme heat.

When comparing climate vulnerability in Spokane today to redlining in the past, there is a pattern between the areas that have higher climate vulnerability and areas that were redlined, particularly neighborhoods in Northeast Spokane and the East Central neighborhood. See Figure 47

Figure 47. Climate Vulnerability and Redlining

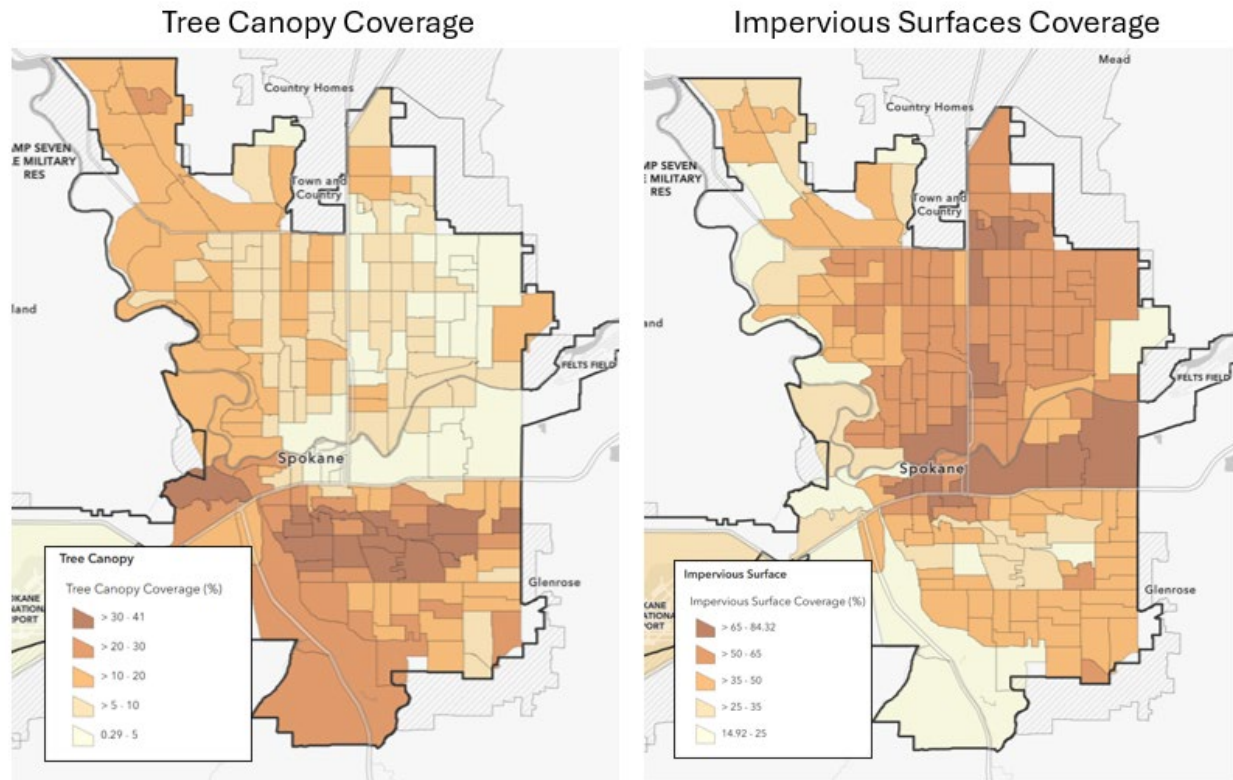


Sources: City of Spokane; Spokane Climate Vulnerability Index, 2025; Spokane HOLC "Redlining" Map

Relating to climate vulnerability, neighborhoods in Northeast Spokane have the lowest percent of tree canopy coverage and higher impervious surfaces coverage, particularly Hillyard, Bemiss, Minnehaha, Chief Garry Park, and East Central. Spokane on average has 20% canopy coverage, with the highest tree coverage being in neighborhoods on the South Hill at almost 40% canopy coverage.⁵³ Compare that with Northeast Spokane which has the neighborhood with the lowest tree canopy coverage and an average of 13% canopy coverage, lower than the city average, and significantly lower than the South Hill. [See Figure 48](#)

⁵³ The Lands Council. Urban Forestry – SpoCanopy & CoolCanopy. <https://landscouncil.org/urban-canopy>

Figure 48. Tree Canopy and Impervious Surface Coverage



Source: City of Spokane; Spokane Climate Vulnerability Index, 2025

4.6 Life Expectancy Outcomes

Disparities in access to services, education, and quality of environment, determined by where people can access housing, have long term impacts on their health. The Spokane Regional Health District (SRHD) provides the County Health Insights Eye on Equity to identify, communicate, and improve health inequity by illustrating differences in health and well-being across different groups within Spokane County.⁵⁴ SRHD defines health inequity as differences in population health that can be traced to unequal economic and social conditions and are systemic and avoidable – and thus inherently unjust and unfair.

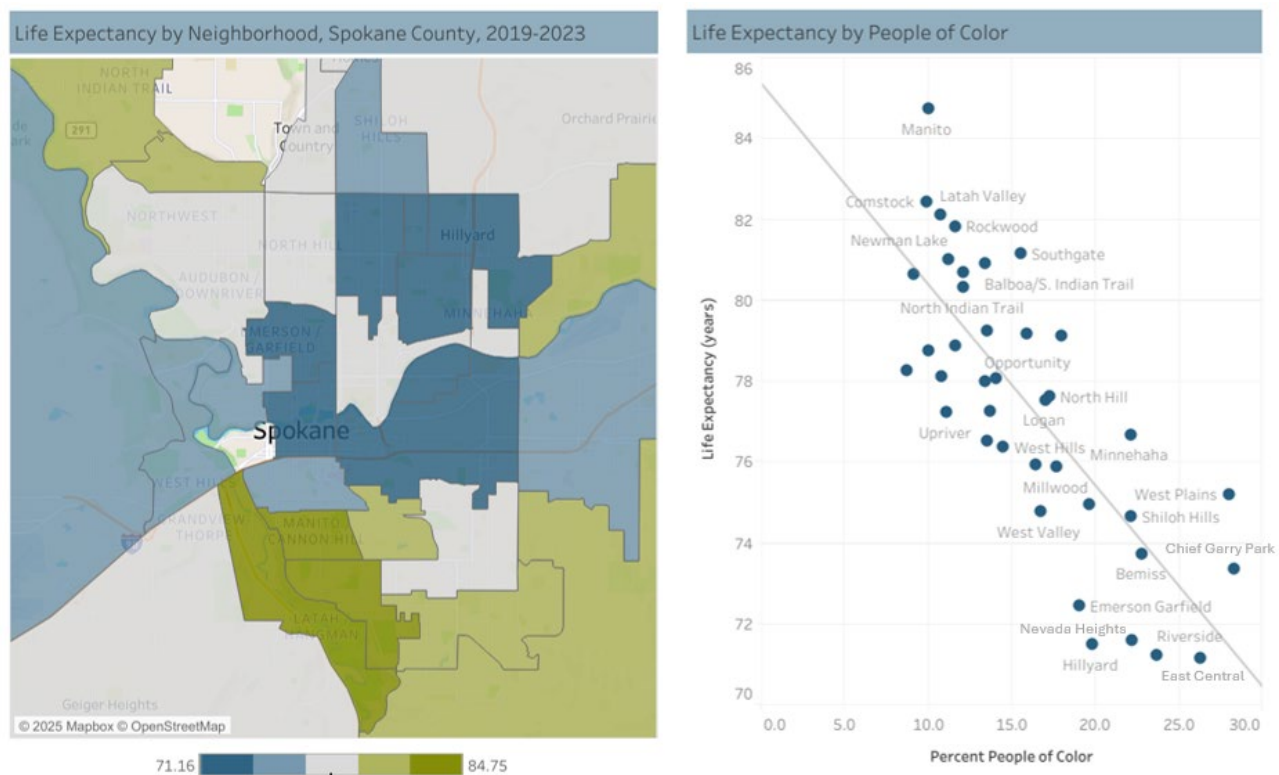
Different neighborhoods have different access to stable housing, quality schools, good jobs, and affordable healthcare, leading a neighborhood or a zip code to be a strong indicator of life expectancy. Life expectancy varies significantly between zip codes, even within the same city or county, and is often influenced by socioeconomic and environmental factors.

⁵⁴ Spokane Regional Health District (SRHD). (2023). *Spokane County Health Insights Eye on Equity*. <https://countyhealthinsights.org/county/spokane/dashboard/eye-on-equity-life-expectancy/>

The average life expectancy in Spokane is 76.9 years,⁵⁵ lower than Spokane County at 78.2 years and Washington State at 79.6 years.⁵⁶ **In the city of Spokane, there is a 13.6-year difference between the neighborhoods with the highest life expectancy of 84.75 years and the neighborhood with the lowest life expectancy 71.16 years.** The neighborhoods with the lowest life expectancy outcomes are in Central Spokane, including East Central, Riverside and West Central, and Northeast Spokane, including Hillyard, Whitman, and Nevada Heights. Neighborhoods on the South Hill have higher life expectancy outcomes, in particular Manito/Cannon Hill, Comstock, Latah/Handman, Rockwood, and Southgate.

There is a relationship between life expectancy and where people live. Neighborhoods with lower life expectancies also contain a higher percent of BIPOC population. Racial groups within neighborhoods also have different life expectancy, with lower life expectancy outcomes for American Indian and Alaska Native, Black, Hispanic, and Native Hawaiian and Other Pacific Islander. In Manito/Cannon Hill, with the highest life expectancy at 84.75 years, Black residents have a lower life expectancy by 24 years than White, Non-Hispanic and Hispanic residents. **See Figure 49**

Figure 49. Life Expectancy by Neighborhood and Race, 2023



Source: Spokane Regional Health District, 2023

⁵⁵ Spokane Regional Health District, 2023

⁵⁶ EWU Institute for Public Policy and Economic Analysis. Spokane Trends. (2025). *5.1.8 Life Expectancy by Zip Code: Average Top 5 to Bottom 5 Zip Codes.*
https://www.spokanetrends.org/graph.cfm?cat_id=5&sub_cat_id=1&ind_id=20

5. Exclusion In Housing

Exclusion 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.⁵⁷ Exclusion is assessed by examining patterns of segregation, that is identifying areas of the city in which the population does not reflect the composition of the overall population. Exclusion may extend beyond race to income, ethnicity, or other sociodemographic characteristics. Analysis of these other factors indicates areas where land use policies may have had a segregating impact.

5.1 Publicly Subsidized Affordable Housing

Publicly supported affordable housing provides access to safe, affordable housing for households within specific income limits.⁵⁸ Some publicly supported housing is owned and operated by the Spokane Housing Authority (SHA) and others by not-for-profit or for-profit entities. The Spokane Housing Authority offers housing choice vouchers (HCV) for households to use to rent private housing can segregate voucher-users into low-rent areas.

Housing incentives for affordable housing projects like Low Income Housing Tax Credits (LITHC) and Multi-Family Tax Exemption (MFTE) appear to be consistently distributed within several areas of Spokane. **The highest concentration of housing choice voucher usage is located in Central Spokane**, particularly downtown in the Riverside neighborhood (more than 750 units), and in the East Central and Chief Garry Park neighborhoods. [See Figure 50](#). When housing patterns or policies concentrate subsidized housing into a few areas, it may mean that low-income households have reduced choice and access to places of opportunity.

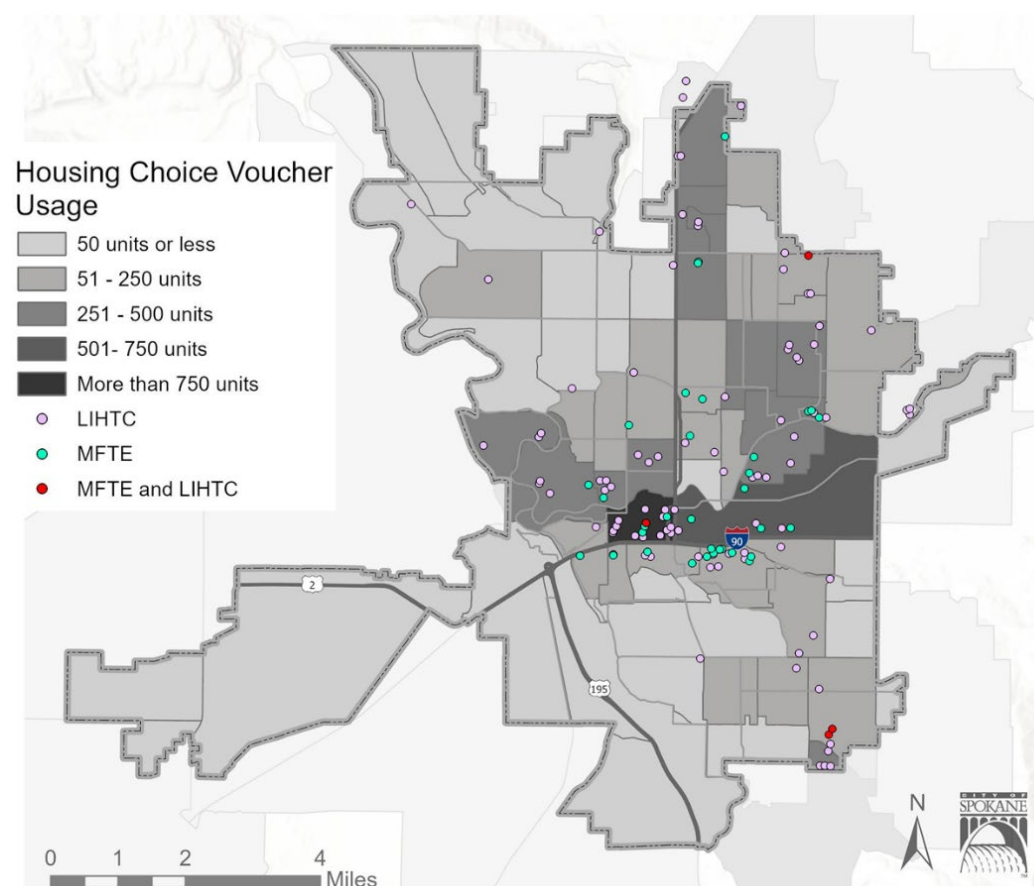
The Spokane 2024 Fair Housing Plan found that Black and Indigenous people participate in publicly supported housing programs at higher rates than other people.⁵⁹ The percent of households participating in HUD subsidized housing programs who are Black, non-Hispanic in Spokane has remained between 7-8% since 2014, while American Indian and Alaska Native made up 4% of all HUD subsidized housing program participants.

⁵⁷ Commerce, 2023a

⁵⁸ Commerce, 2023a

⁵⁹ City of Spokane, 2024a

Figure 50. Publicly Subsidized Affordable Housing



Sources: City of Spokane; Spokane Housing Authority - Housing Choice Voucher usage data, 2020-2024; City of Spokane Planning Services - MFTE and LIHTC project locations, 2024

People with disabilities are disproportionately represented among publicly supported housing programs, making up over 40% of participants. Additionally, 68% of HCV participants have a disability, and the majority of these are single person households (76%). However, there is a shortage of available subsidized accessible units and private market units which HCV rent standards will cover. **The Fair Housing Plan found that accessible units are majority found in newly constructed multi-unit housing, due to the requirements and exemptions in the Fair Housing Act for design and construction. People with disabilities are thus often limited to residing in areas with multi-unit housing, which includes a concentration of usage downtown and in neighborhoods farther north.** People with physical disabilities are likely to have less opportunity to reside in areas with predominantly single-unit housing. Additionally, people with disabilities are also often dependent upon public transportation, which further limits housing choice to regions of the city to where they can access public transportation.

In 2019, SHA converted all 125 public housing units to project-based vouchers under the HCV program, which the Fair Housing Plan identified as a concern for the loss of public housing.⁶⁰

⁶⁰ City of Spokane, 2024a

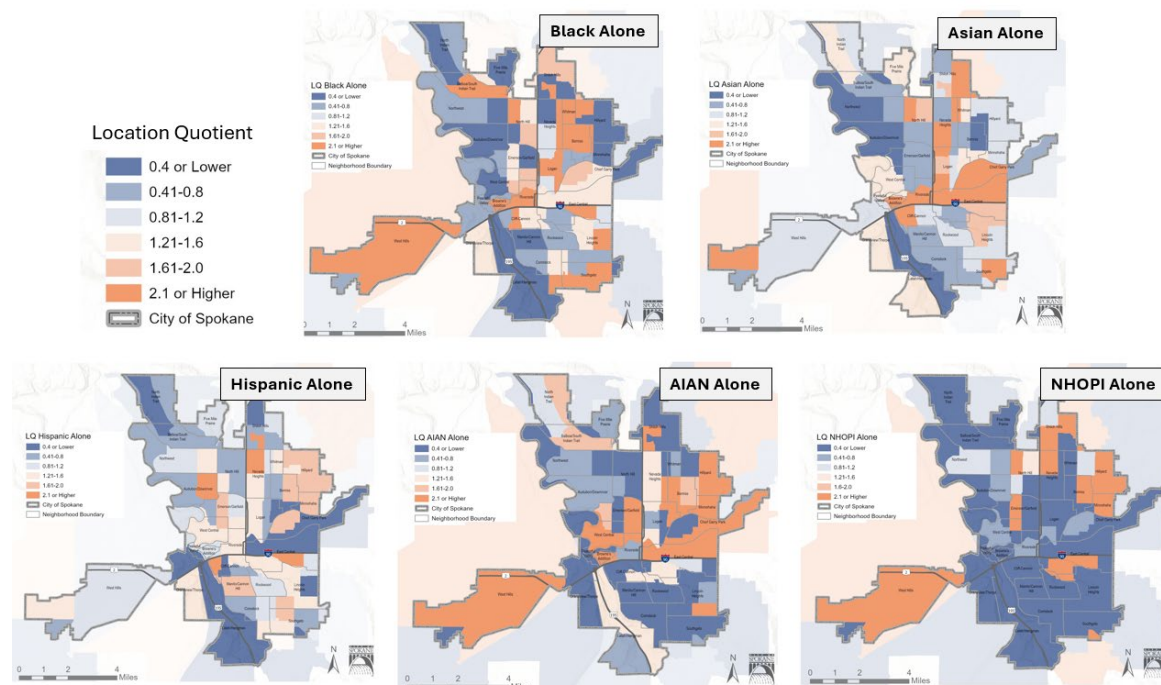
5.2 Concentrations of Population Groups

Another way to assess segregation is by using a location quotient.⁶¹ The location quotient is a measure of how concentrated a particular demographic group is within an area. Calculating the location quotient of a specific demographic group can show the relative concentration of that group in each census tract relative to the city as a whole.

- **Equal:** A value of 1 means the census tract has the same proportion of people of a race/ethnicity than the County.
- **Higher:** A value higher than 1 means the census tract has a higher proportion of people of a race/ethnicity than the County, meaning where people are segregated.
- **Lower:** A value lower than 1 means the census tract has a lower proportion of people of a race/ethnicity than the County, meaning where people are excluded.

Northeast Spokane has the highest diversity in the city, and many neighborhoods have a location quotient over 1, with a higher concentration of Black, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander populations. Asian and Hispanic populations are slightly less concentrated but still follow a similar pattern in Northeast Spokane. AI/AN and NHOPI populations are almost entirely excluded from neighborhoods in South Spokane and Northwest Spokane. NHOPI populations are most concentrated and primarily live in northeast Spokane and East Central. Hispanic populations are most evenly distributed throughout Spokane, with a large number of neighborhoods with a location quotient close to 1. **See Figure 51**

Figure 51. Concentration of Race/Ethnicity in Neighborhoods



Source: City of Spokane; PolicyMap, 2025.

⁶¹ Commerce, 2023a

5.3 Employment and Access to Jobs

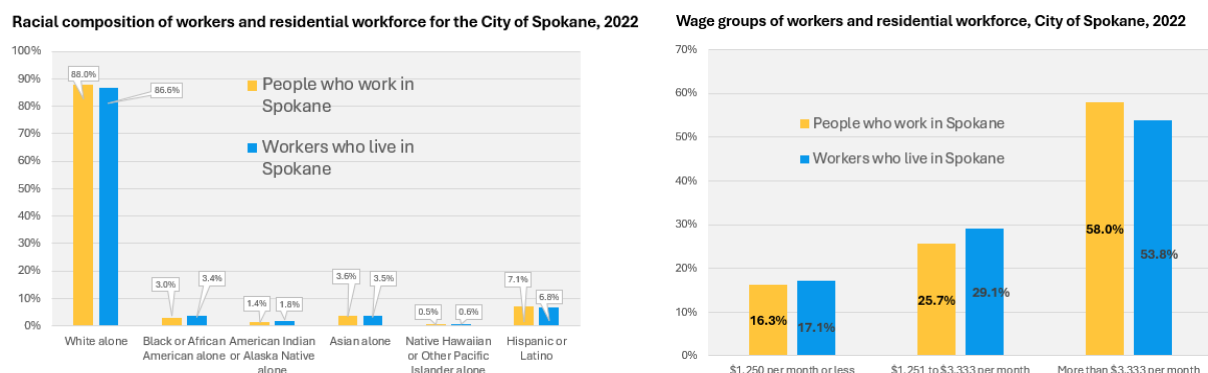
People of all racial and ethnic backgrounds should have equitable access to Spokane's employment opportunities.⁶² However, BIPOC households have encountered many structural barriers to accessing housing in high demand areas due to such factors as racially restrictive covenants and regulations that prohibit housing suited to their needs. One approach to assess whether there is evidence of exclusion from a jurisdiction as a whole is to compare the racial profile of the local workforce (the people who work in a jurisdiction) to the workers who live in a jurisdiction (the working residents) to see if the residential profile and the workforce profile are similar or different, which would suggest an exclusionary effect in housing.

The racial profile of the Spokane workforce is similar to the overall demographics of the city. A slightly larger proportion of the people who work in Spokane are White (88%) than compared to the workers who live in Spokane (86.6%). There are slightly more people of color who live in the city of Spokane than people of color who work in the city of Spokane. The data suggests a lack of residential exclusion of BIPOC households from living within the city. [See Figure 49](#)

For workers who earn less than \$3,333 per month, there is more workers who live in Spokane, than people who work in Spokane. For workers who earn more than \$3,333 per month, there is more people who work in Spokane than workers who live in Spokane. However, higher income earners have more access to housing choice. This data suggests that there is housing opportunity across all income groups for workers in the city of Spokane.

Overall, while there are clear impacts to housing access by income and race for different areas within the city of Spokane, the data does not suggest that people who want to live in Spokane are excluded from doing so based on race or income. This is likely due to Spokane being the leader in the region for affordable housing provision and a diversity of housing types that provide a range of options for residents and their needs.

Figure 52. Composition of Workers and Residential Workforce, 2022



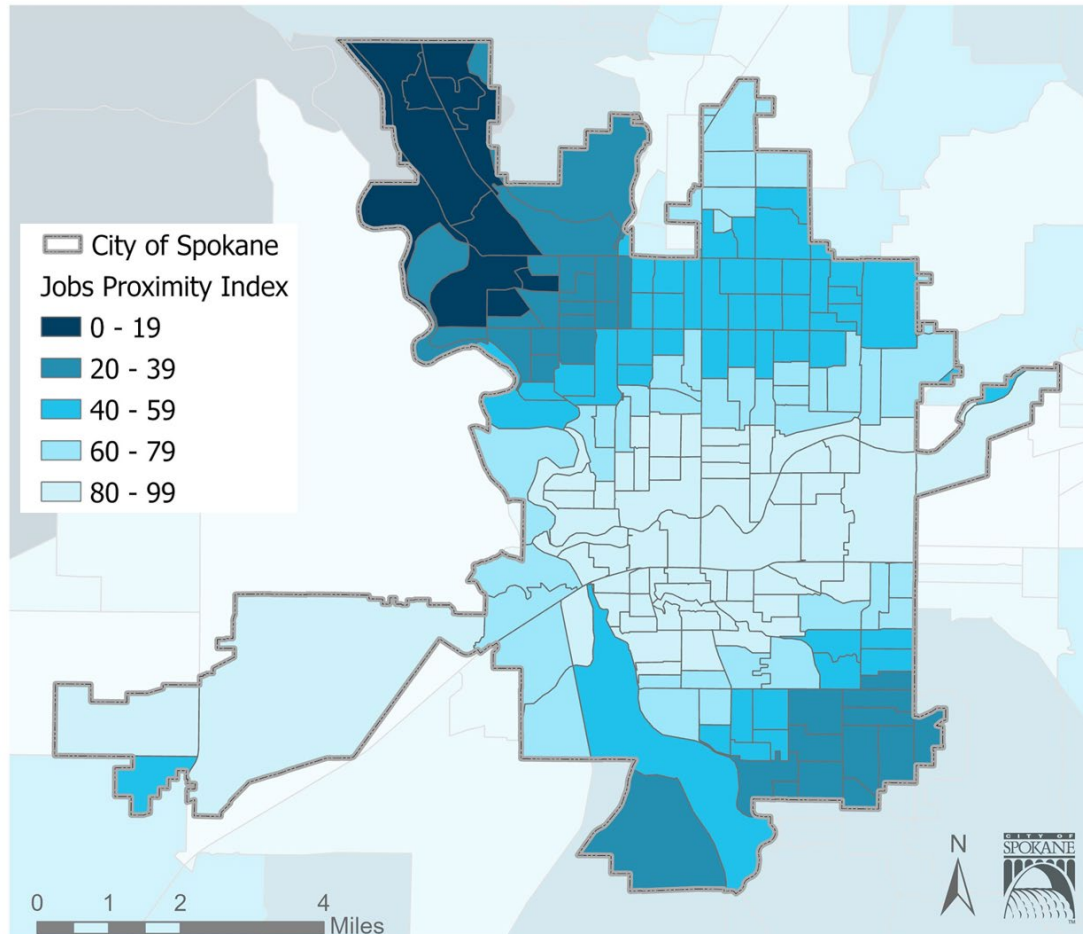
Source: City of Spokane; US Census Bureau LEHD Origin Destination Employment Statistics (On TheMap), 2022

⁶² Commerce, 2023a

5.4 Jobs Proximity & Commute Burden

The jobs proximity index quantifies the accessibility of a given census block group related to its distance to all job locations within Spokane, with larger employment centers weighted more heavily. The higher the index value, the better access to employment opportunities for residents. **Due to I-90, areas closer to downtown have better access to jobs compared to those on the outskirts of the city, suggesting there is not an exclusion to jobs proximity. See Figure 53**

Figure 53. Jobs Proximity Index



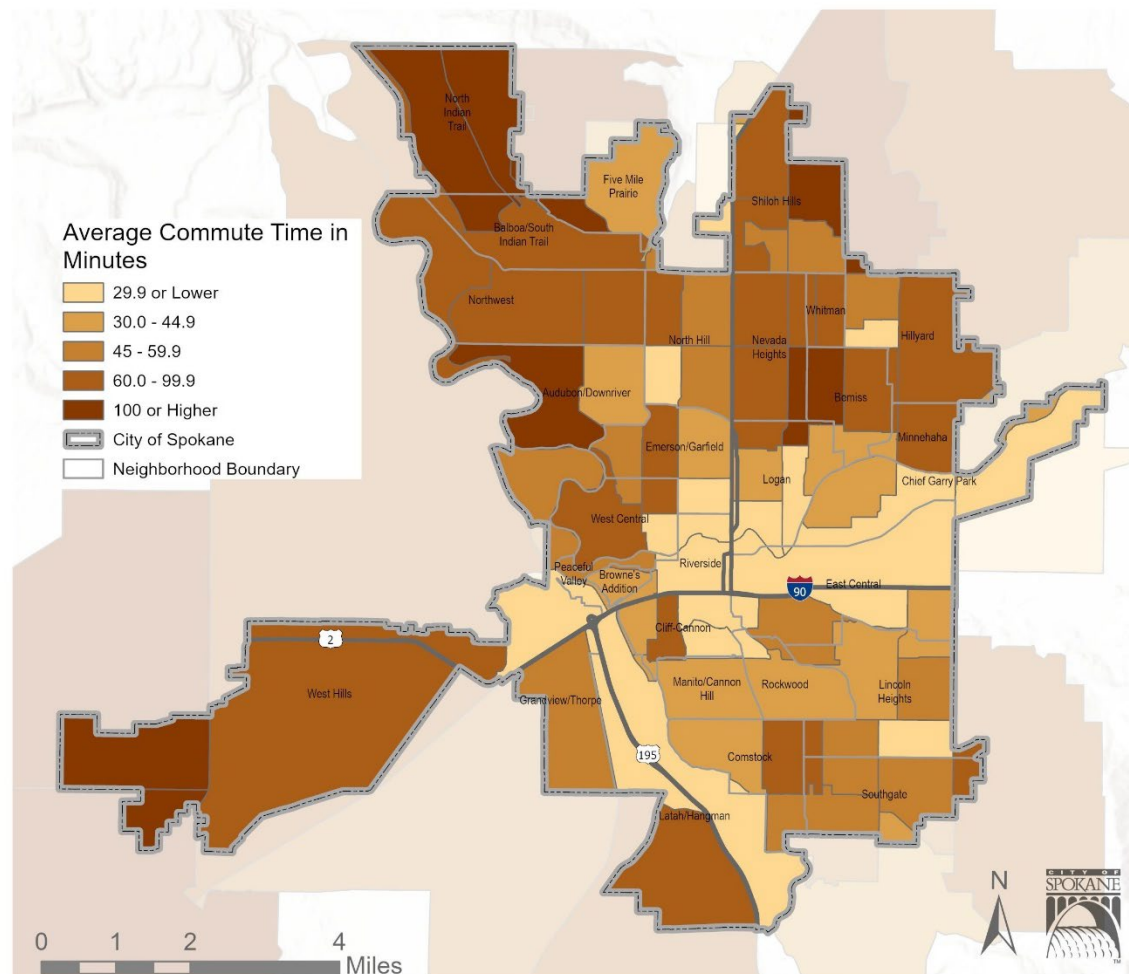
Source: City of Spokane; HUD AFFH-T Data documentation-AFFHT0006, 2020

Looking further at commute burden can identify if different populations experience different work commute lengths, which may be due to lack of affordable housing near job centers, inadequate transit and segregation impacts of historical housing policies.⁶³ By examining travel time at the Census tract level alongside race, ethnicity and income data, analysis can explore whether certain subgroups are impacted by commuting.

⁶³ Commerce, 2023a

In Spokane, Census tracts at the edges of the city, especially north and west, have a higher commute burden (60 minutes or higher) compared to those closer to downtown. Understanding the demographic concentration of people of color in northeast Spokane, East Central, and the central city, the commute trends suggest there is not a racially disparate impact for commute burden. **The proximity to I-90 in East Central and Riverside neighborhoods, which historically and currently have higher populations of communities of color, suggest a lower commute burden but is still reflective of the legacy of divisive highway infrastructure and a reminder of the benefits and burdened associated with proximity to transportation corridors. See Figure 54**

Figure 54. Average Commute Time in Minutes

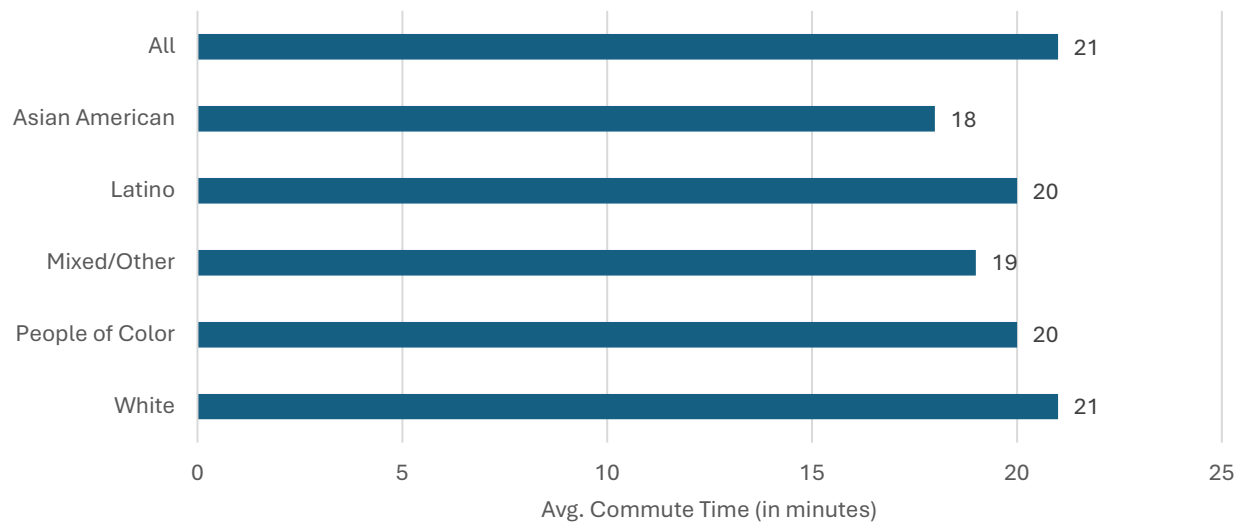


Source: City of Spokane; US Census Bureau, 2019-2023 ACS-5 Year Estimates

Data suggests there is a slightly higher commute burden for people of color below the 200% poverty level. While the commute is shorter for those in Central Spokane and East Central, it comes at high cost of noise and air pollution, environmental harms, and increased health disparities. **See Figure 55**

White residents have the highest commute burden when comparing race and income levels. This commute burden generally aligns with neighborhoods also that have higher household incomes and higher homeownership census tracts in the northwest and southwest, which suggests that wealthier people are able to live further from the city center.

Figure 55. Commute Burden by Race, 2022

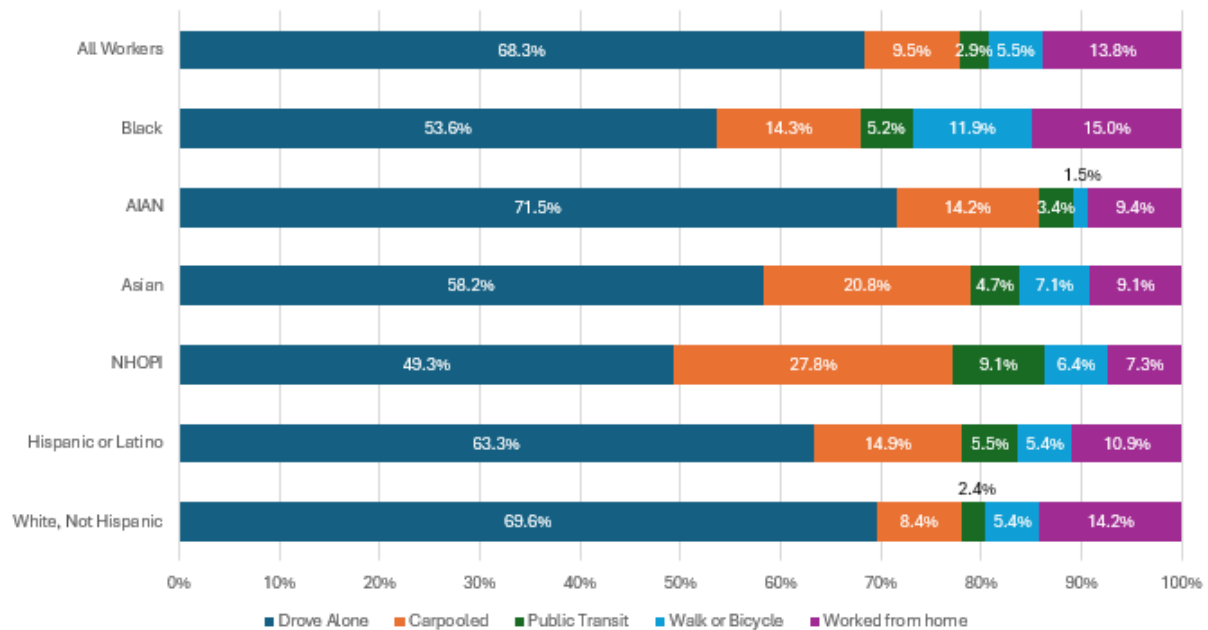


Source: City of Spokane; National Equity Atlas, IPUMS USA, https://nationalequityatlas.org/indicators/Commute_time?geo=07000000005367000

For means of transportation to work, 68% of workers in Spokane drove to work alone. **See Figure 56.** Specific findings suggest differing access and proximity to housing, jobs, and are reflective of income levels:

- American Indian and Alaska Native workers and White, Not Hispanic workers had the highest percentage of driving to work alone, both higher than the average of all workers.
- American Indian and Alaska Native had the lowest use of public transit, which could suggest living far from public transit routes.
- Asian workers had high rates of carpooling, while Native Hawaiian and Other Pacific Islander workers had the highest percentage of public transit use and carpooling.
- Black workers had the highest rate of working from home, and nearly double walking or cycling to work than other racial groups, while also high rates of carpooling.
- White, Not-Hispanic workers had the lowest use of carpooling and public transit use of any race/ethnicity group.
- All workers of color had higher rates than the city level for transportation by other means than driving alone, including taking public transit.

Figure 56. Means of Transportation for Workers by Race/Ethnicity, 2023



Source: City of Spokane; U.S. Census Bureau, U.S. Department of Commerce. (2023). Means of Transportation to Work. American Community Survey, ACS 5-Year Estimates Detailed Tables. Tables B08105 A-I

6. Displacement

In addition to analyzing racially disparate impacts regarding access to housing and the outcomes associated with where someone is able to live, it is also important to consider the potential risk of losing that housing. Displacement is when a household is forced or pressured to move from their community by factors outside of their control.⁶⁴ Displacement can have a life-changing negative effect on households that are directly impacted. It can also disrupt the social fabric and networks of trust and support that exist within a community. Displacement can happen to households, businesses, and community institutions. Importantly, the scale of displacement analysis should be at the neighborhood level; that is, whether households or businesses are forced out of their neighborhood.

While displacement due to rising costs is the most common form, there are many forms of displacement, including:

- **Economic displacement:** Displacement due to inability to afford rising rents or costs of homeownership like property taxes.
- **Physical displacement:** Displacement resulting from eviction, acquisition, rehabilitation or demolition of property, or the expiration of covenants on rent-or income-restricted housing. Climate-related displacement, such as increasing flood risk, dangerous heat or forest fire, falls into this category.
- **Cultural displacement:** Residents are prompted to move because the people and institutions that make up their cultural community have left the area. This may also include displacement as residents seeking opportunities such as education, employment, amenities, or community institutions cannot find them within their neighborhood.

6.1 Demographic Change

While Spokane has grown consistently over the last decade, the growth has not been spread equally across the city. **There has been higher percent change in total population between the 5-year periods of 2014-2018 and 2019-2023 in Central Spokane and pockets in Northeast and Southeast Spokane, particularly on the southeastern edge of the city.** There has been percent decrease in Northwest Spokane, as well as areas closer in neighborhoods in West Central and Chief Garry Park. [See Figure 57](#)

When looking at the percent change in the count of BIPOC population over the same time periods, the majority of Census Tracts in Spokane experienced population growth in BIPOC population, particularly in South Spokane in areas that have had historically lower BIPOC populations. This suggests an increase in integration into areas that have historically had more exclusion.

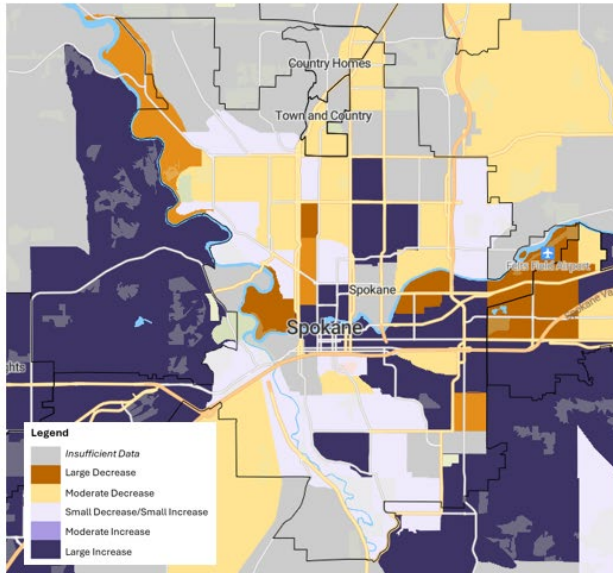
In contrast, **areas that have historically had larger BIPOC populations saw a decrease in BIPOC population during the same time frame,** including East Central and Chief Garry Park neighborhoods, which can suggest displacement or gentrification within these historic cultural

⁶⁴ Commerce, 2023a

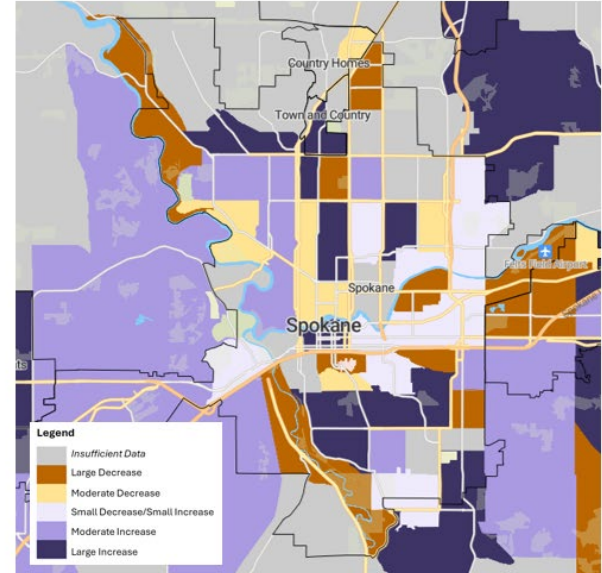
communities. Areas that had a decrease in total population but an increase in BIPOC population include the West Central, Bemiss, Minnehaha, and Grandview/Thrope neighborhoods.

Figure 57. Population Percent Change, 2014-2023

Total Population: Percent Change between 2014-2018 and 2019-2023



People of Color Population: Percent Change between 2014-2018 and 2019-2023



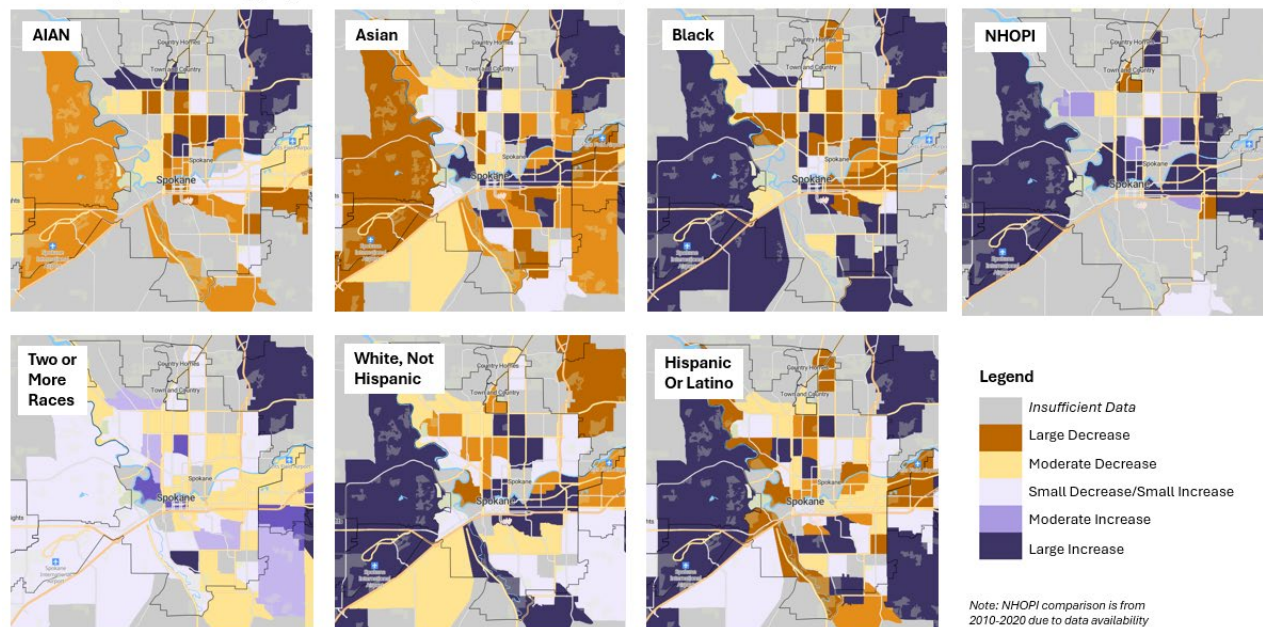
Source: PolicyMap. (n.d.). Estimated percent change in the number of the population between the periods of 2014-2018 and 2019-2023 [Map based on data from Census: US Bureau of the Census]. <http://www.policymap.com>

When looking more specifically at changes in the East Central Neighborhood, population groups that had a moderate to large decrease in proportion of that population within the Census Tract were Black, Two or More races, and Hispanic or Latino populations. East Central saw an increase in proportion of American Indian and Alaska Native, Asian, and Native Hawaiian and Other Pacific Islander populations, as well as a larger increase in the proportion of White, Not Hispanic and Latino populations. As a diverse neighborhood with a historically Black population, the increases in proportion of other races within East Central, along with a decrease in the Black population, suggests potential ongoing displacement of Black residents.

The Chief Garry Park Neighborhood saw a decrease among Asian, Black, Hispanic or Latino, and White, Not Hispanic residents while seeing an increase in Native Hawaiian and Other Pacific Islander, Asian, and multiracial populations, suggesting shifting population demographics over time. [See Figure 58](#)

Figure 58. Population Percent Change by Race and Ethnicity, 2014-2023

Estimated percent change by race and ethnicity between the periods of 2014-2018 and 2019-2023



Source: PolicyMap. (n.d.). Estimated percent change in the number of the population between the periods of 2014-2018 and 2019-2023 [Map based on data from Census: US Bureau of the Census]. <http://www.policymap.com>

6.2 Evictions and Foreclosures

Eviction is the process by which a household is forced to leave their housing due to a failure to meet the conditions of the leasing contract and is a direct form of displacement to the household.⁶⁵ People who have experienced eviction are at a greater risk of housing insecurity, vulnerability to exploitation, and homelessness.

Between 2018 and 2022, the highest concentration of evictions in Spokane was in the Central and Northeast neighborhoods, especially those directly north of I-90 or east of Division Street. Downtown (Riverside), West Central, and Shiloh Hills neighborhoods had the highest number of evictions overall, while Shiloh Hills, Minnehaha, and West Hills had the most individual properties with the highest number of evictions. **See Figure 59**

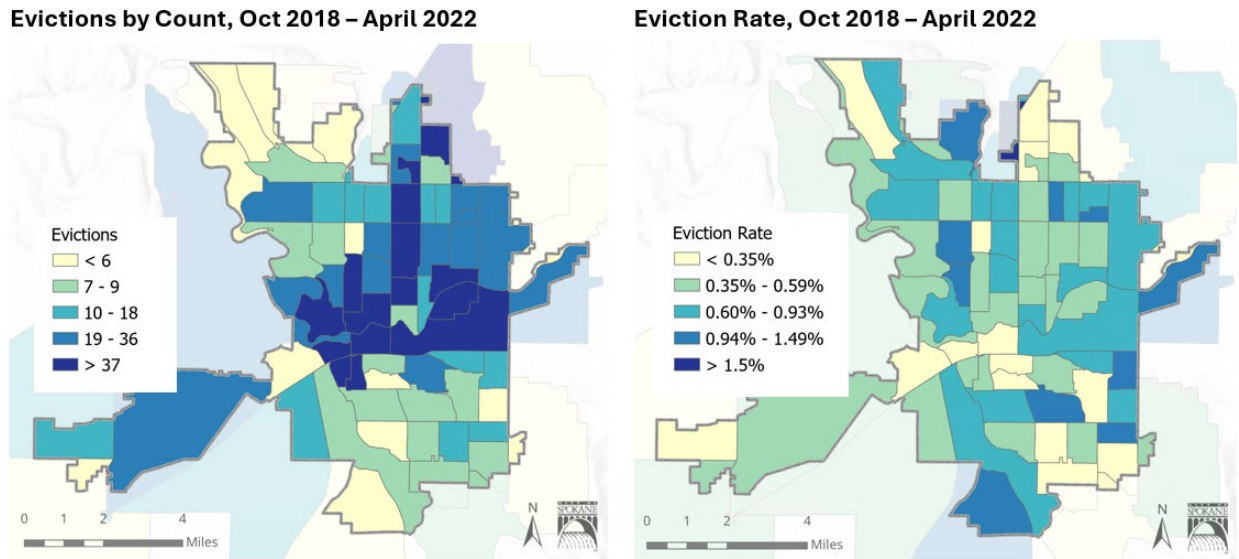
During the COVID pandemic, the City of Spokane had an eviction moratorium, initially implemented as part of the state-wide eviction moratorium. The state-wide moratorium ended in June 2021 and the City of Spokane ended COVID protections in July 2023. It is likely evictions have risen since this time, post-eviction moratorium, so the analysis focuses on the difference in concentration of evictions by area, rather than total number.

When considering the concentration of rental housing in each Census Tract, citywide spatial patterns of evictions are less apparent. Areas that do not stand out when looking at eviction count alone, especially those with the highest homeowner rates, stand out as having higher evictions rates because

⁶⁵ Commerce, 2023a

those few evictions make up more of the limited rentals units available. On the other hand, areas with more rental opportunities like in Central Spokane appear less impacted by evictions when reviewing eviction rate, rather than total evictions, due to the larger number of rental units available.

Figure 59. Evictions, 2018-2022



Source: City of Spokane; Staal, A., Zickefoose, G., Mutungi, D., Newton, T., Andrie, T., Deitz, S., Ramos, D., and M. Anderson. (2022), Displacement, Houselessness, and Gentrification in Spokane, WA: Empirical Analysis of Housing, Eviction, and PIT Data. Eastern Washington University.

To understand not only where these evictions occurred, but also who was impacted, the demographic data from the *Washington State's Appointed Counsel Program: Baseline Report* (August 2023) was used.⁶⁶ The Washington State Appointed Council Program provides legal representation to low-income residents facing eviction in Washington State. Highlighted within the 2024 Fair Housing Plan, the report states that the statewide racial composition of clients served was 54.8% White, 10.4% Black, 6% Native American, and 4% Latino. This means that Black and Native American people disproportionately participated in the right-to-counsel program while facing eviction.⁶⁷

In addition to renters, homeowners face the potential for direct displacement through mortgage foreclosures. Foreclosures affect homeowners who are no longer able to maintain mortgage payments.⁶⁸ Foreclosures can indicate the presence of vulnerable homeowners. If a property owner hits financial distress and enters foreclosure, the tenants could be at risk of displacement when the building is sold. In foreclosures, the homeowner and household members are displaced, often at a time with limited financial resources.

⁶⁶ Fyall, R., Martin, K., and von Geldern, W. (2023). *Washington State's Appointed Counsel Program: Baseline Report*. University of Washington. https://ocla.wa.gov/sites/default/files/2025-06/OCLA_202310_FinalReportonImplementationofTenantAppointmentCounselProgram.pdf

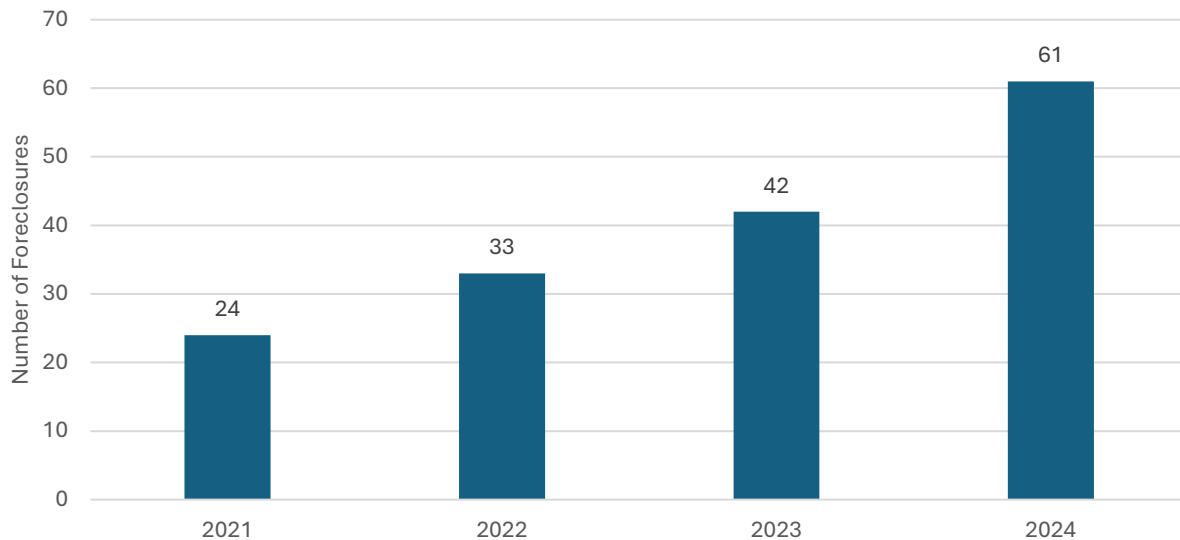
⁶⁷ City of Spokane, 2024a

⁶⁸ Commerce, 2023a

Mortgage foreclosures in the Spokane have increased consistently since 2021, with a total of 160 foreclosures from 2021 to 2024. Foreclosures occurred across the entire city, with a majority being along and north of I-90. [See Figure 60](#)

Foreclosure can also occur in the context of unpaid property taxes. Tax foreclosure occurs after three consecutive years of non-payment. Between 2021 and 2024, there were also a total of 17 tax foreclosures in the city of Spokane.⁶⁹

Figure 60. Mortgage Foreclosures, 2021-2024



Sources: City of Spokane; Spokane County Auditor Online Recorded Documents, 2021-2024, Trustee Deeds.
<https://recording.spokanecounty.org/recorder/web/>

6.3 Demolitions

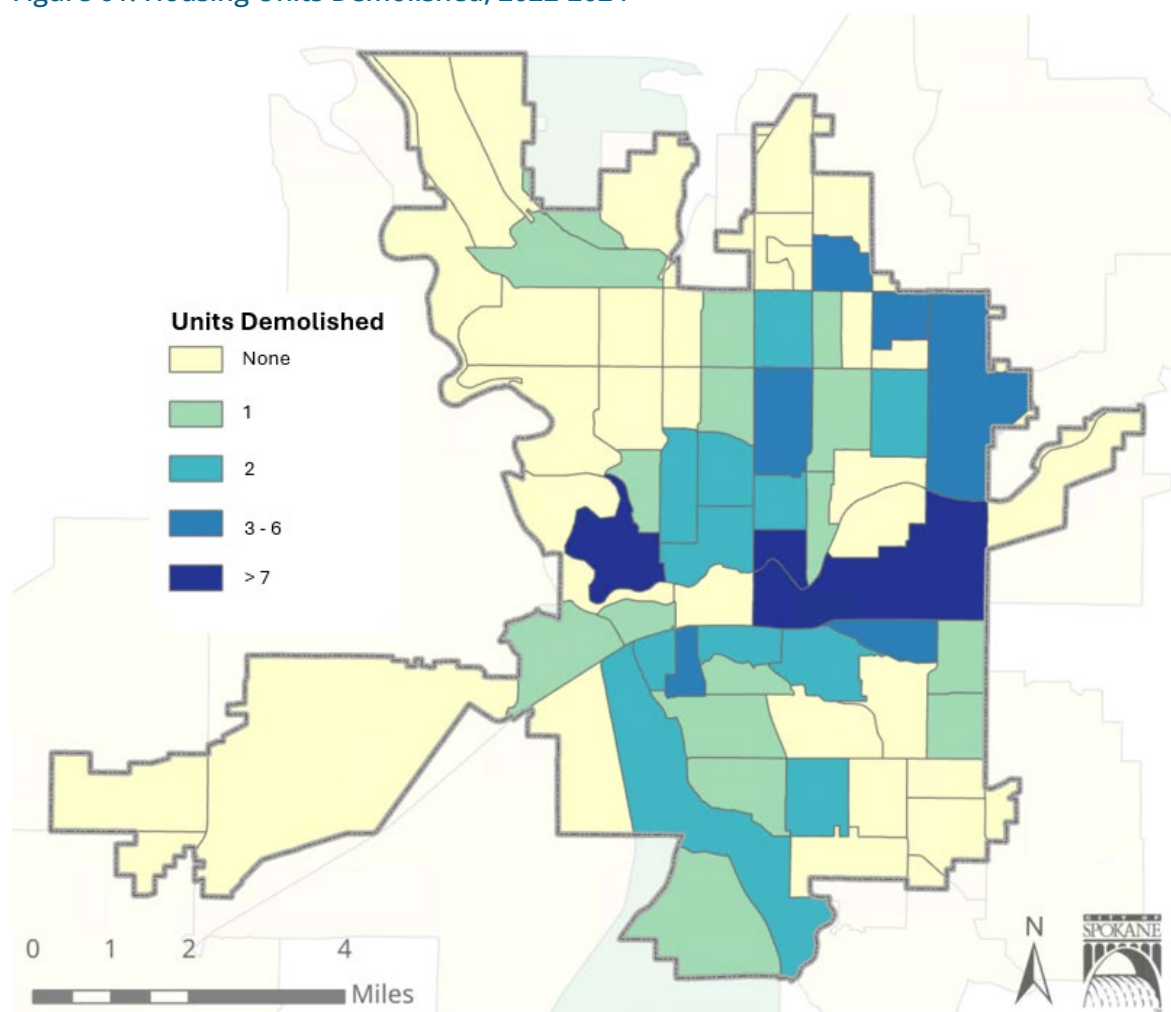
Reviewing where housing has been lost over time due to demolition, condemnations, natural disasters, conversions, or public acquisition can reveal additional evidence of physical displacement that has already occurred.⁷⁰ Though housing units lost may be replaced by new structures through redevelopment, the new development may not meet the needs of the displaced residents, either due to lack of affordability, change in size of unit(s), or the development of a non-residential use. Not only do demolitions and redevelopment displace residents from their homes, but it may also lead to rising housing costs and eventually displace them from their neighborhoods.

A total of 154 residential units were lost in the city to demolitions between 2022 and 2024. Census Tract 145 in East Central had the largest number of demolitions with more than 15 units lost, closely followed by Census Tract 25.03 in Logan and Census Tract 23 in West Central. [See Figure 61](#)

⁶⁹ Spokane County Treasurer

⁷⁰ Commerce, 2023a

Figure 61. Housing Units Demolished, 2022-2024



Source: City of Spokane DSC, 2022-2024

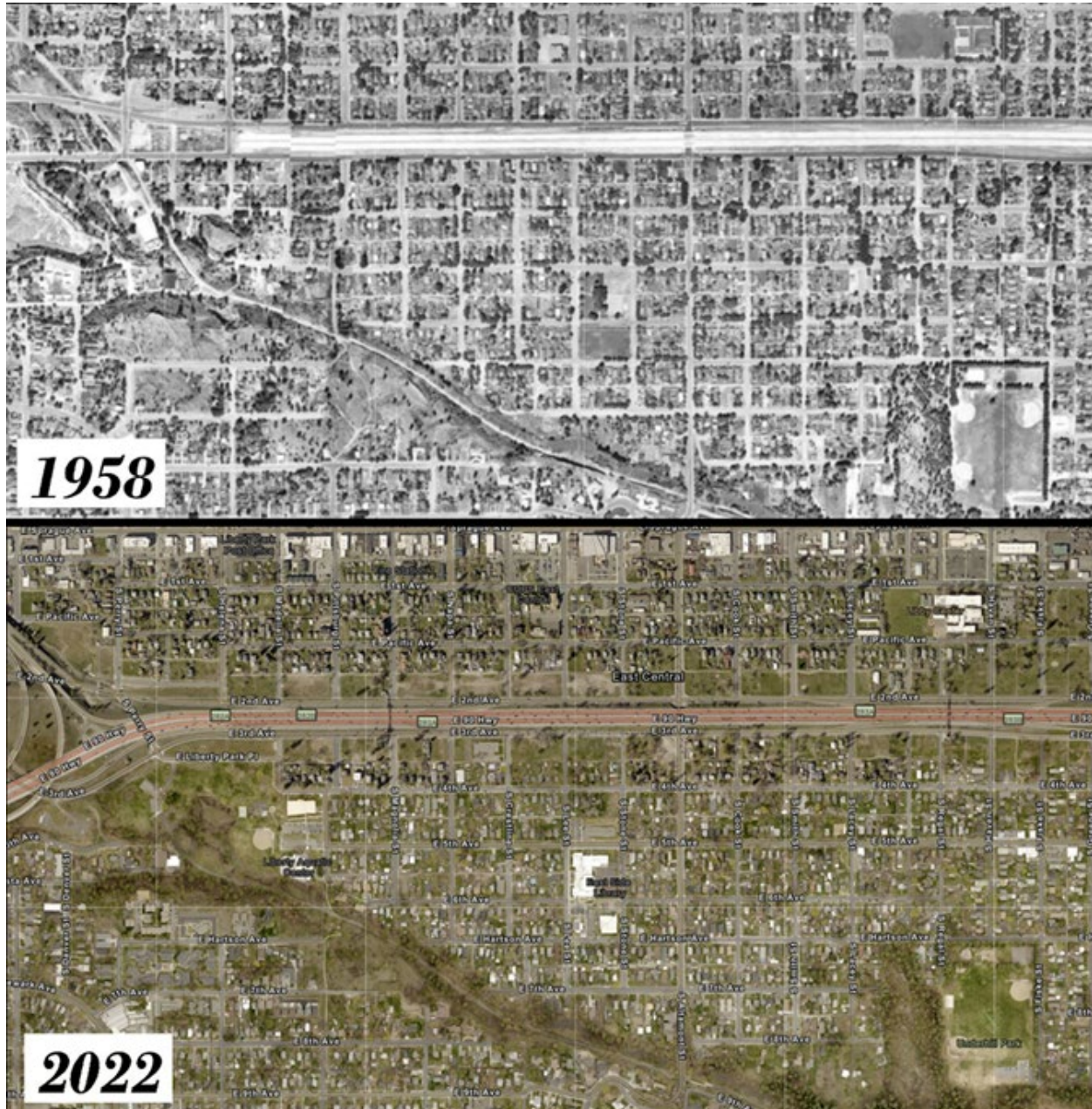
6.3.1 Right of Way Acquisition

Spokane neighborhoods have also experienced displacement through right of way acquisition from freeway building, both historic and ongoing. In East Central, freeway construction by the Federal Highway Administration divided the neighborhood with the I-90 surface level freeway in the 1950s and 1960s as part of the development of the interstate highway system. Federal highway construction across the country had a disproportionately negative impact on Black and Brown communities, often leading to displacement, segregation, and economic disinvestment. Federal highway construction impacted East Central with the same patterns. In 1953, Washington State Department of Transportation (WSDOT) acquired lots for the planned I-90 freeway, and they auctioned off the buildings on the sites.⁷¹ Research provided by the Spokane Office of Historic Preservation outlined: “Some families were willing to sell their homes for the state’s offer price, but other’s homes were taken through eminent domain.”

⁷¹ Spokane Historic Preservation Office, 2023

Research conducted by the New Urban Mobility Alliance (NUMO) in 2025 in partnership with the Carl Maxey Center and City of Spokane, estimated that 657 parcels were removed in East Central for I-90 between 2nd and 3rd Avenues from Liberty Park and Havana Street.⁷² See Figure 62. Exact uses are not currently available, but most likely would have included residential and commercial parcels. In addition, 19 of 21 acres of Liberty Park were taken over by the freeway.

Figure 62. Comparison of Aerial Imagery in East Central, 1958 and 2022



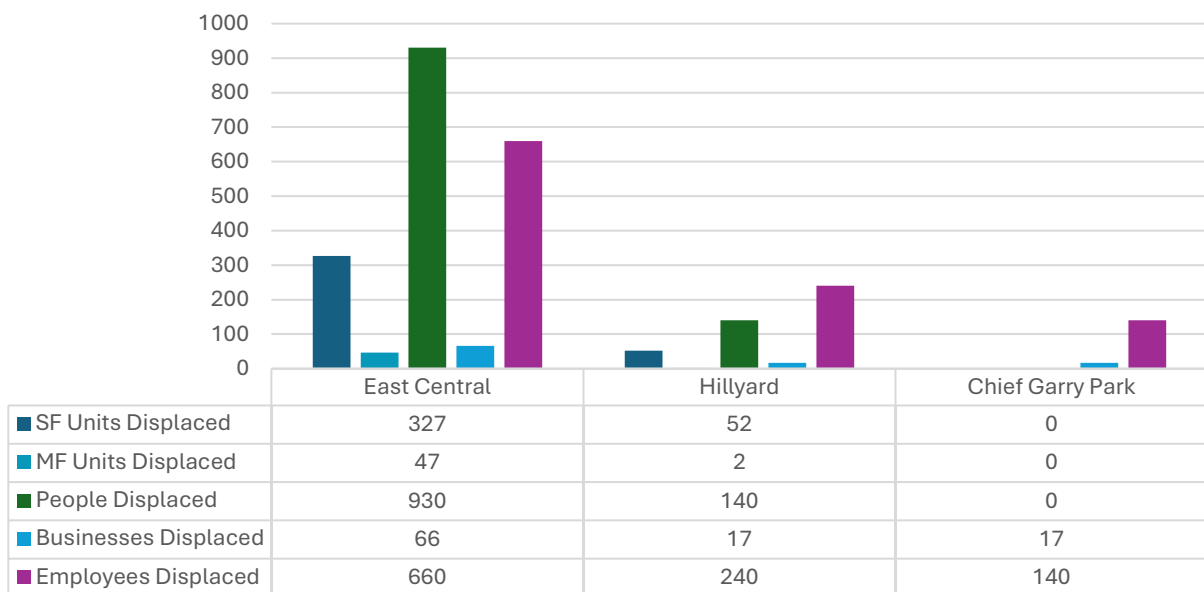
Source: Spokane Historic Preservation Office, 2023

⁷² New Urban Mobility Alliance (NUMO). (2025). *Spokane Land Use Analysis*.
<https://my.spokanecity.org/projects/fifth-avenue-plan/>

Around the same time as the I-90 planning, the North Spokane Corridor (NSC) was conceived in the mid-1940s as an alternate north/south route through Spokane.⁷³ It took more than 50 years of research, planning, legislation, and public input for WSDOT to gain approval for the North Spokane Corridor (US 395), which would once again impact the East Central Neighborhood by connecting the new freeway to I-90 in East Central. To prepare for the construction, WSDOT pursued right of way acquisition to acquire additional properties for the US 395 and I-90 interchange beginning in the early 2000s. Running north and south, US 395 would come to bisect four neighborhoods, Hillyard, Minnehaha, Chief Garry Park, and East Central—all in Northeast Spokane.

In the North Spokane Freeway Final Environmental Impact Statement undertaken by WSDOT in 1997, analysis outlined that the preferred alternative for the US 395 development would displace 450 single family homes and 53 multi-family units for a total of 503 housing units, estimated to be 1,280 people displaced.⁷⁴ Additionally, it was estimated that 114 businesses would be displaced, totaling 1,220 employees. By neighborhood, East Central had the greatest displacement with 374 housing units (327 SF and 47 MF units) lost, estimated to be 930 people displaced; as well as 66 businesses, totaling 660 employees. Displacement in Hillyard was estimated to be 54 housing units, 140 people, 17 businesses, and 240 employees. The NSC route through Chief Garry Park did not impact a residential area but displaced an estimated 17 businesses, totaling 140 employees. **See Figure 63**

Figure 63. Displacements by Neighborhood for the North Spokane Corridor Preferred Alternative, 1997



Source: City of Spokane; Washington State Department of Transportation, 1997. Note: The table was created using data from the FEIS.

⁷³ Washington State Department of Transportation (WSDOT). (2025). *Major Project: North Spokane Corridor*. <https://wsdot.wa.gov/construction-planning/major-projects/north-spokane-corridor>

⁷⁴ U.S. Department of Transportation, Federal Highways Administration, and Washington State Department of Transportation (WSDOT). (1997). *North Spokane Freeway Final Environmental Impact Statement and Section 4(f) Evaluation*

The 1997 Final Environmental Impact Statement (FEIS) further outlined displacement impacts in East Central due to the freeway infrastructure: “Displacement of persons living along the south side, and more especially the north side, of I-90 will further erode the neighborhood’s residential quality. The area along the north side of I-90 would be reduced from two to one and one-half blocks wide, or even less in some cases. Added to this is a higher level of activity resulting from the freeway and the Sprague Avenue business district, which could further affect neighborhood livability. Stability for single family homeowners would be less certain. Expanding businesses and replacing single family houses with apartments could create a speculative rather than a stable environment.”⁷⁵

The FEIS analyzed that widening this section of the I-90 corridor unavoidably displaced many families, particularly minorities, as quoted: “This predominately white neighborhood, where the highest percentage of family displacement occurs, also has higher percentages of minorities than the city as a whole. There is a moderate change in the majority percentage, from 81% within the neighborhood as a whole to 75% within the impacted area.”

In East Central, the racial and ethnic characteristics of displaced families included 9.3% Black residents, 5.8% American Indian residents, 2.1% Asian residents, 4.8% Hispanic residents, and 2.7% other racial/ethnic groups—for a total of 24.3% of the population representing people of color. **See Figure 64.** In the 1990 Census, the closest decennial Census to the FEIS publication, the White, Not Hispanic or Latino population for the city of Spokane was 92% of the population and 8% people of color. For a city with only 1.9% Black population in 1990, 9.3% was more than four times the concentration of Black residents in East Central than the city overall. A similar concentration existed with American Indian and Hispanic populations, which were both 2% of the city’s 1990 population, respectively by close to or over 5% in East Central. **This highlights that people of color in East Central, and particularly Black residents, have been disproportionately impacted by displacement from the NSC freeway construction.**

Figure 64. Ethnic Characteristics of Displaced Families in East Central from the US 395 Preferred Alternative in the FEIS, 1997

White	Black	Amer. Indian	Asian	Hispanic	Other
75.3%	9.3%	5.8%	2.1%	4.8%	2.7%
NOTE: Percentages were calculated from US Census data, supplied by SRTC, using block data. The C/D takes are by ½ blocks on either side of the freeway & includes some partial block takes for the NSF/I-90 I/C.					

Ethnic Characteristics of Displaced Families Within the East Central Neighborhood

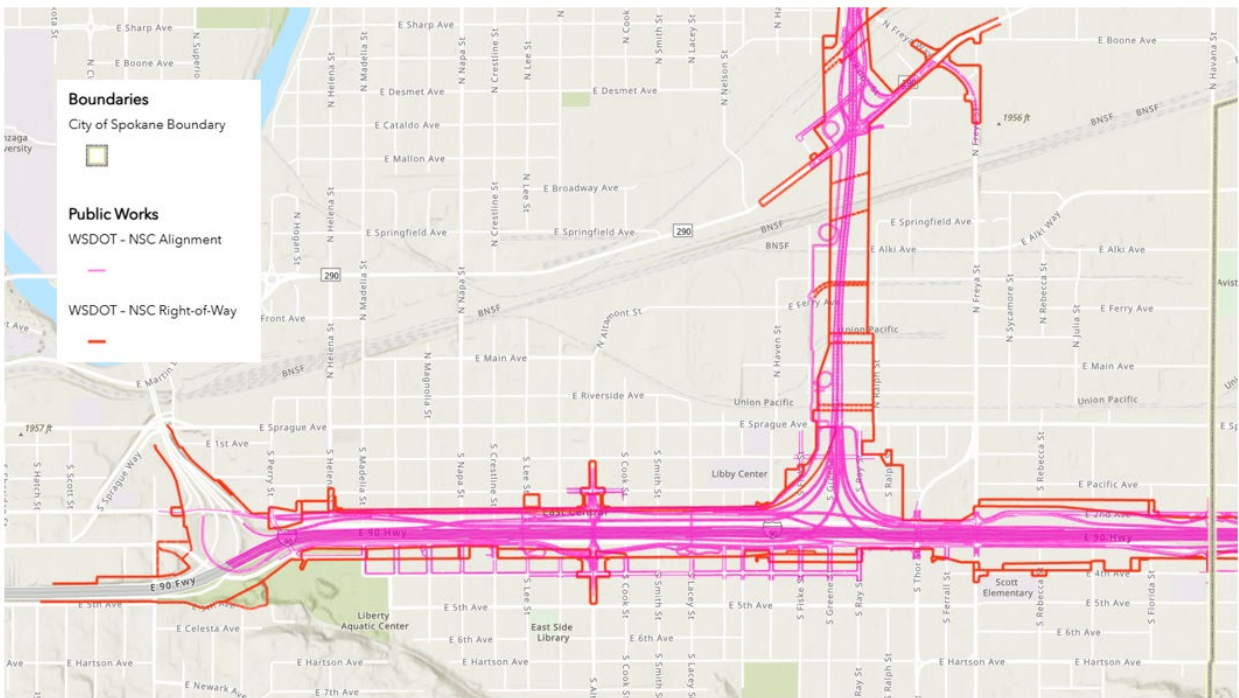
Table 4-33

Source: WSDOT FEIS, 1997, Page 4-136. Note that the highlight is included in source text to highlight revisions to the body of the text after the September 1995 publication of the Draft EIS.

⁷⁵ WSDOT, 1997

As of 2025, the estimated number of housing units displaced in East Central from right of way property acquisition is between 400-450, nearly 100 more than anticipated—located primarily along I-90 immediately north and south of the freeway in Census Tracts 29, 30 and part of Tract 145. There remains a lasting impact from the development of these freeways in East Central and Northeast Spokane, which displaced many Spokane residents and businesses, and disproportionately affected communities of color. [See Figure 65](#)

Figure 65. North Spokane Corridor Alignment and Right of Way in East Central



Source: City of Spokane; WSDOT

7. Displacement Risk

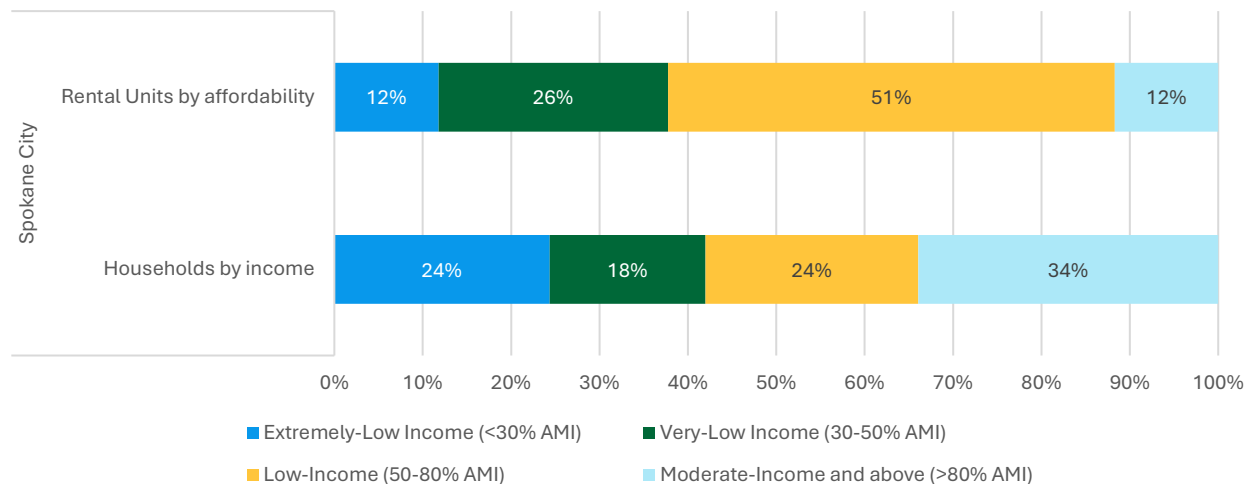
Whereas analysis of displacement assesses where people have been displaced, displacement risk analysis looks at where future displacement is likely to occur given the current and expected market conditions and characteristics of households in the area.⁷⁶ The GMA requires communities to identify areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments (RCW 36.70A.070(2)(g)). Identifying these areas allows a community to better plan for the needs of impacted households and implement protective measures.

7.1 Housing Affordability and Availability

One way to look at housing constraints and losses is to look at the change in rental unit availability by affordability level. HUD CHAS data provides estimates of housing units affordable to households with incomes ranges at various area median income levels, known as AMI.⁷⁷ AMI is used to determine eligibility for various housing and income-based programs, varying by household size and income.

In the city of Spokane, extremely low-income households (< 30% AMI) have fewer affordable rental units available to them than other income groups (24% of households earn <30AMI, but only 12% of rental units are affordable to households with that income). Households earning moderate income and above (>80% AMI) also have fewer rental units available to them. [See Figure 66](#)

Figure 66. Spokane Renter Income Compared to Rental Unit Affordability, 2021



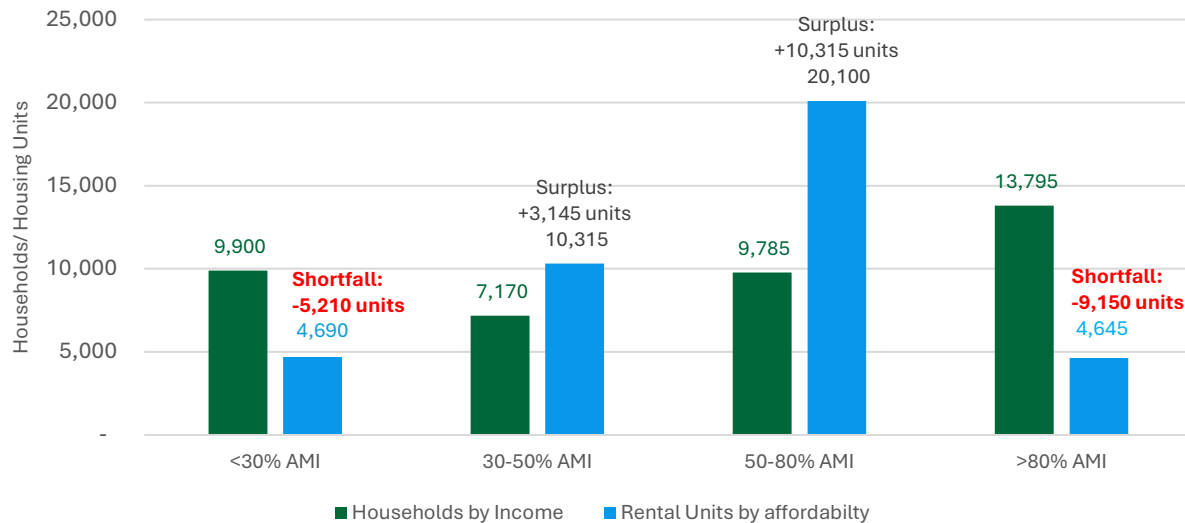
Source: City of Spokane; US HUD, 2017-2021 Comprehensive Housing Affordability Strategy (CHAS) (Table 8)

⁷⁶ Commerce, 2023a

⁷⁷ Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low-income households.

In 2021, the difference between the number of extremely low-income households (< 30% AMI) and the number of rental units available and affordable at the price resulted in a shortfall of 5,210 units, meaning they had access to fewer housing options they could afford. Households earning moderate income and above (>80% AMI) also had fewer rental units available to them. [See Figure 67](#)

Figure 67. Spokane Renter Income and Rental Unit Availability, 2021



Sources: City of Spokane; US HUD, 2017-2021 Comprehensive Housing Affordability Strategy (CHAS) (Table 8), (Table 15C) & US HUD, 2017-2021 Comprehensive Housing Affordability Strategy (CHAS) (Table 14B). Note: +/- The difference between number of households in the income group and the number of rental units affordable to the income group.

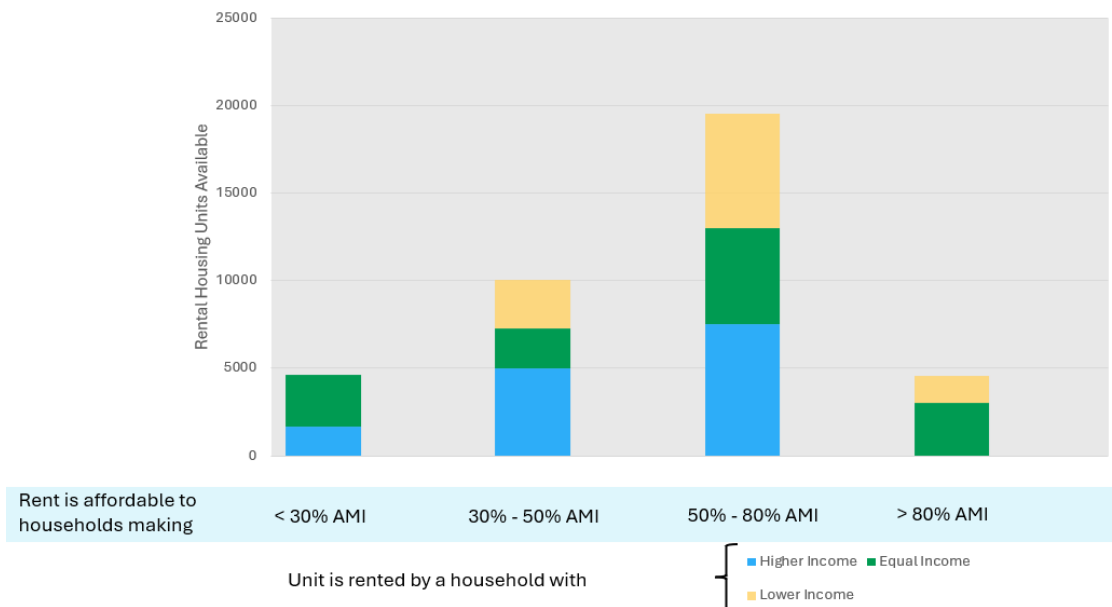
The difference in number of households at each affordability level and the number of units available to them suggests households are being forced to over-rent and under-rent. In Spokane:

- About half of the units affordable to 30 – 50% AMI income households and about one third of units affordable to 50 – 80% AMI income households are rented by households with more income, meaning they are under-renting.
- About a quarter of the units affordable to 30 – 50% AMI income households and about one third of units affordable to 50 – 80% AMI income households are rented by households with less income, meaning they are spending more than 30% of their income on housing and are cost burdened.
- **The lack of units affordable to households making below 30% or above 80% AMI results in households over and under renting, reducing the number of units available to the renters in those affordability brackets.** [See Figure 68](#)

Over-renting is when families are cost-burdened and pay more than 30% of their income on housing.

Under-renting is when households pay less than they can afford for rent, further reducing housing available to lower income households.

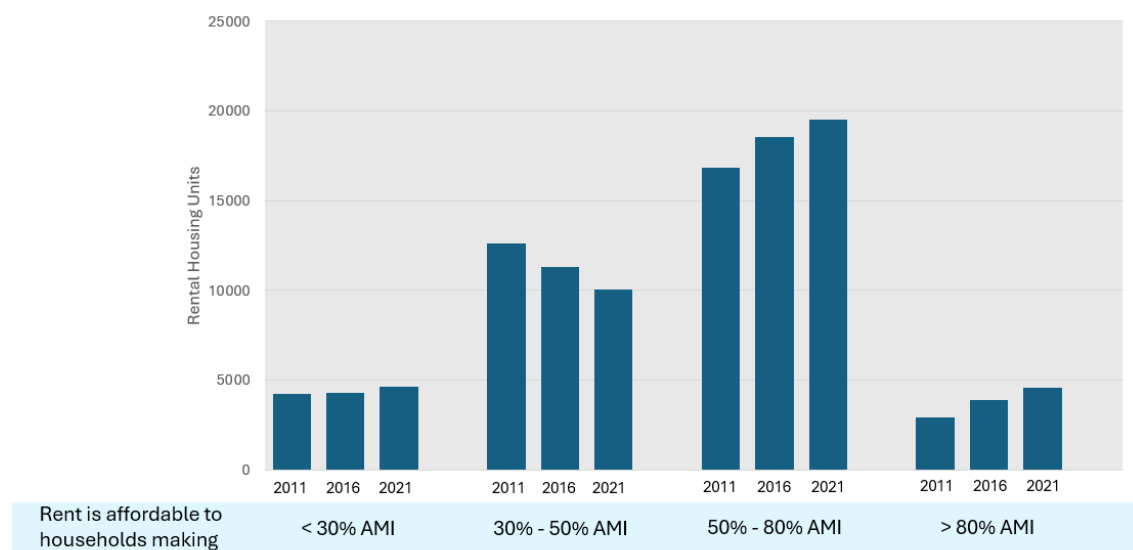
Figure 68. Rental Units by Affordability Level and Renter Income, 2017-2021



Sources: City of Spokane; US HUD, 2017-2021 Comprehensive Housing Affordability Strategy (CHAS) Table 15C

The proportion of households under and over renting remains generally consistent over time in Spokane. The more apparent change is the number of units affordable to each income band over time. The number of rental units affordable to households making 30%-50% AMI has decreased between 2011 and 2021 while it has increased for all other affordability levels. **This suggests that the City is making progress in meeting the needs of the higher income renters through new market-rate construction, but the progress is slower for lower-income housing, including the loss of units affordable to very low-income households. See Figure 69**

Figure 69. Rental Units Available by Affordability Level, 2011-2021

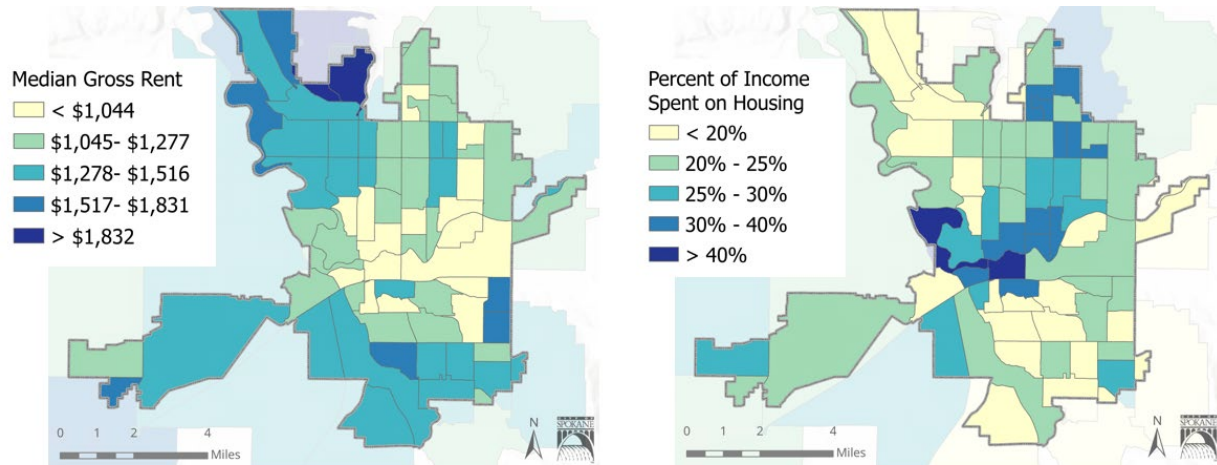


Sources: City of Spokane; US HUD, 2017-2021 Comprehensive Housing Affordability Strategy (CHAS) Table 15C

Rental Affordability

Looking at the geographic areas where residents are spending more of their income on housing could indicate places at risk for future displacement. While rental costs are highest on the South Hill and in Northwest Spokane, income is also generally higher in those areas. When looking at the percent of income spent on housing, median households in Central and Northeast Spokane spend a higher proportion of their income on housing than the remaining areas of the city and may be less likely to be able to adapt to displacement pressures. [See Figure 70](#)

Figure 70. Rental Housing Affordability, 2023



Sources: City of Spokane; US Census ACS Table B25031 Median Gross Rent (2023) and Table S2503 Financial Characteristics (2023)

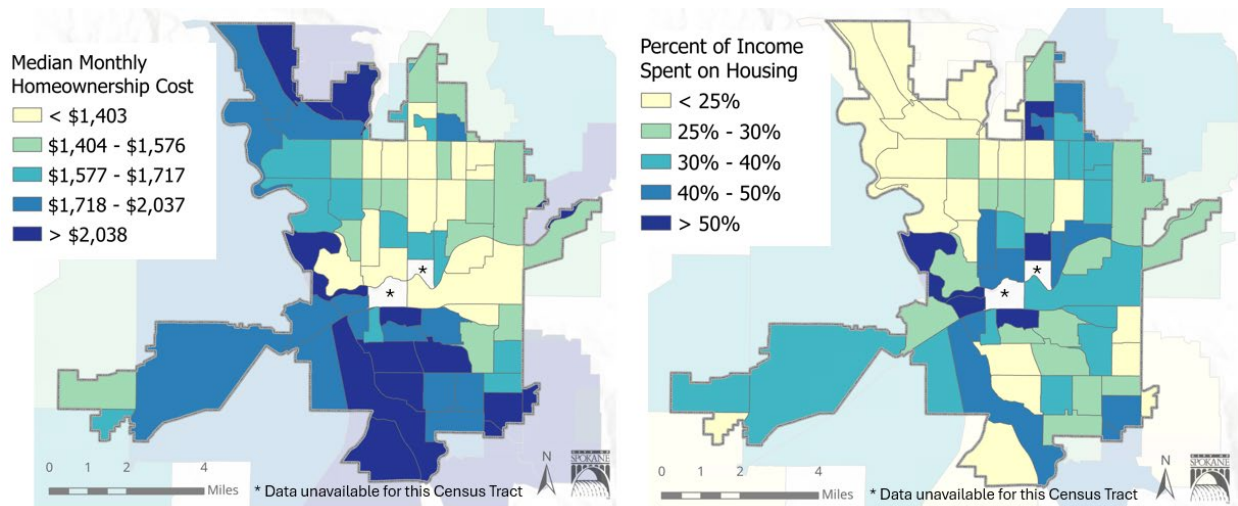
Homeownership Affordability

Monthly homeownership costs are generally higher than rental costs, and are highest in South Spokane, particularly in the Manito/Cannon Hill, Comstock, Rockwood, Latah/Hangman, and Southgate neighborhoods. There are also higher homeownership costs in Northwest Spokane on the edge of the city in North Indian Trail and 5 Mile Prairie neighborhoods. [See Figure 71](#)

There are some Census Tracts with higher homeownership costs that are adjacent to Tracts with lower homeownership costs, which can suggest proximity to a gentrifying area, patterns of historic investment or disinvestment, or other market pressures such as proximity to amenities like view corridors or barriers from topography, infrastructure, and environmental disparities.

When looking at percent of income spent on housing, some of the Census Tracts with higher homeownership costs have lower cost burden, suggesting higher incomes and the ability to afford higher costs in neighborhoods like Manito/Cannon Hill and Comstock. Conversely, there are some Census Tracts that have lower homeownership costs but are cost-burdened, suggesting households may be struggling to afford housing in neighborhoods in Northeast Spokane and Central Spokane. There are three Census Tracts that have both higher homeownership costs and are severely cost burdened which include portions of West Hills, East Central, Cliff-Cannon, and Shiloh Hills, suggesting higher risk for homeowner displacement and vulnerability.

Figure 71. Homeownership Affordability, 2023



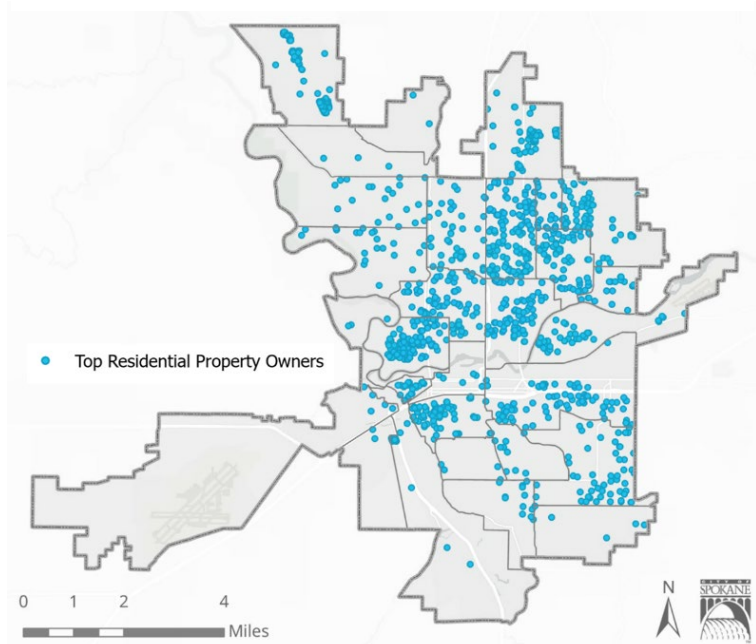
Source: City of Spokane; US Census ACS Table S2503 Financial Characteristics (2023)

Large-scale Property Owners

Large-scale corporate ownership of rental properties, especially by outside investors, has been linked to increased sale and rental prices due to the reduction in number of units available for homeownership opportunities and the ability of the corporate investors to influence the market through the scale of units they control. The top 23 rental property owners in Spokane own 1,230 properties, totaling more than 6,350 rental units, with high concentrations in North Indian Trail, Nevada Heights, West Central, East Central, and neighborhoods in the northeast as well as closer in central city.⁷⁸ See Figure 72.

Two-thirds of the rental units are single unit properties, with the remaining third are 2-4 unit and 5-plus unit properties. Nearly 10% of the properties have been built since 2018, with a larger majority built before 1960. The majority of the owners are categorized as large, local landlords.⁷⁹

Figure 72. Top Residential Property Owners in Spokane



Source: City of Spokane; Spokane County Assessor; Tolemi, Top Residential Property Owners, 2025

⁷⁸ City of Spokane, Spokane County Accessors Office

⁷⁹ City of Spokane, Code Enforcement

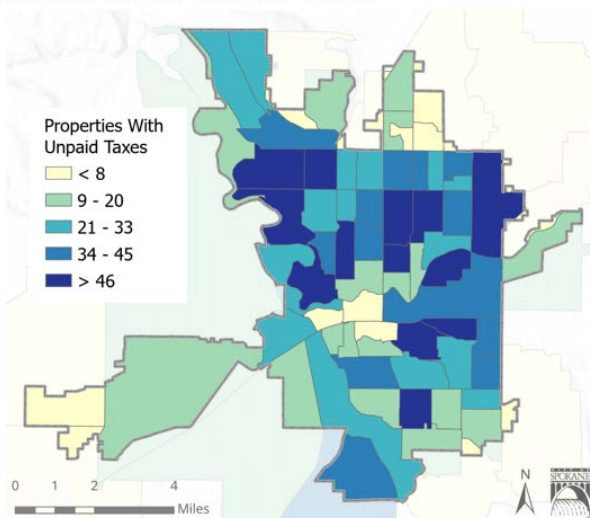
7.2 Unpaid Property Taxes

Unpaid taxes can also be an indicator of financial stress and lead to tax foreclosure after three consecutive years of non-payment. In Spokane, 2,188 parcels, roughly 3% of residential properties, have unpaid taxes that were due in 2023 or 2024 totaling over \$4.73 million. [See Figure 73](#)

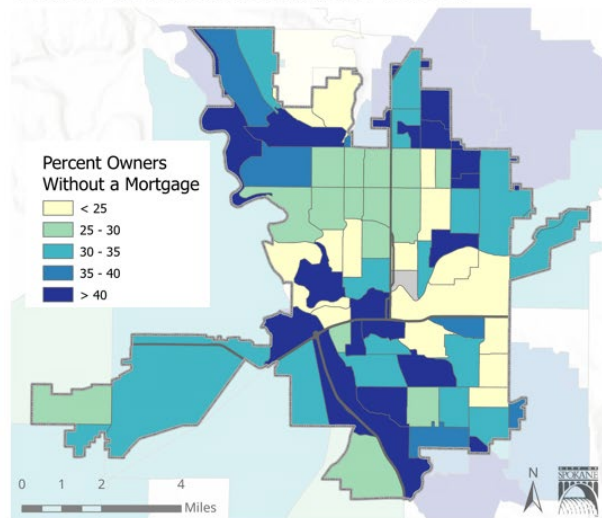
Homeowners who have paid off their mortgage may choose to defer their property tax up to two years without penalty which may skew the unpaid property tax results. For example, in North Spokane, Census Tracts south of Francis Avenue generally have lower homeowner rates and higher unpaid property taxes than Tracts on the South Hill or in North Indian Trail. This could mean that the areas with higher homeownership rates are taking advantage of the property tax deferral rather than not paying based on economic burden. If that is the case, North Spokane has a higher risk of tax foreclosure based on economic hardship than South Spokane and has a higher risk for future displacement.

Figure 73. Unpaid Property Taxes, 2025

Unpaid Property Taxes, by count



Owners Without a Mortgage, by Percent



Sources: City of Spokane; Spokane County Accessors Office, 2025

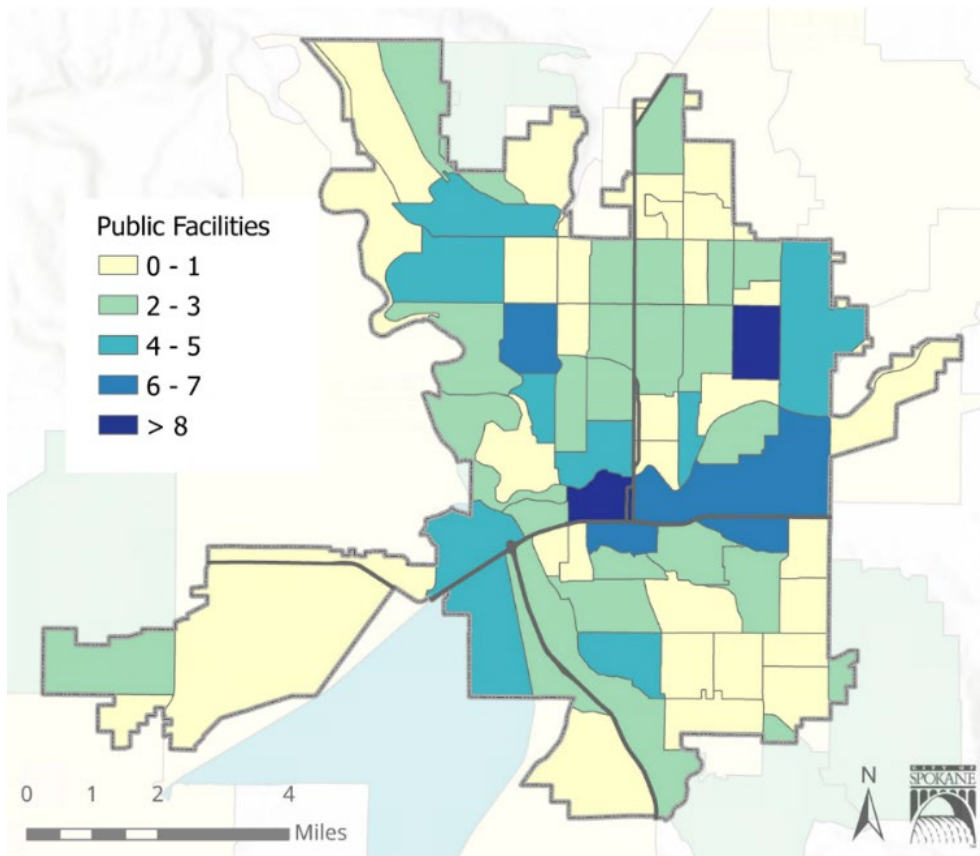
7.3 Amenities and Infrastructure

Displacement risk can also be influenced by proximity to or presence of amenities, including access to parks, schools, community centers, libraries, and aquatic centers. These desirable amenities provide stability and quality of life, which can both help preserve neighborhoods and put pressure on existing residents if investments and desirability changes over time. Cumulatively, locations where multiple amenities are concentrated include downtown, Liberty Park, the Northeast Community Center, and Shadle Park. [See Figure 74](#)

Access to public transportation can also impact the desirability and access of neighborhoods with lasting impacts on displacement risk for existing residents. Some areas of the city have no current

access to public transportation or infrequent service, while others have access to multiple routes with frequent service.

Figure 74. Presence of Public Facilities

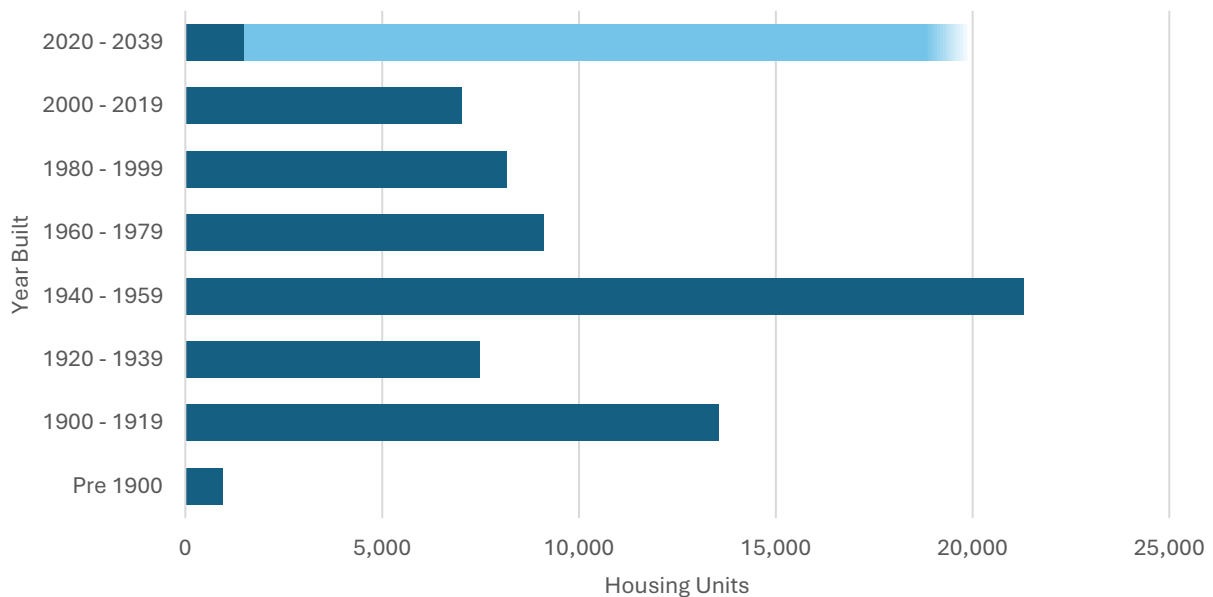


Source: City of Spokane, 2025

7.4 Housing Age and Quality

Housing age can provide indication of housing quality and condition. While older housing does not inherently mean poorer quality, it can mean additional maintenance costs for residents that could contribute to financial stress and eventually displacement. **In Spokane, 21% of the city's housing units are more than 100 years old, while more than 75% were built before 1980.** Close to half of housing units were built before 1960, the adoption date of modern building codes. [See Figure 73](#)

Figure 75. Spokane Housing Units by Year Built

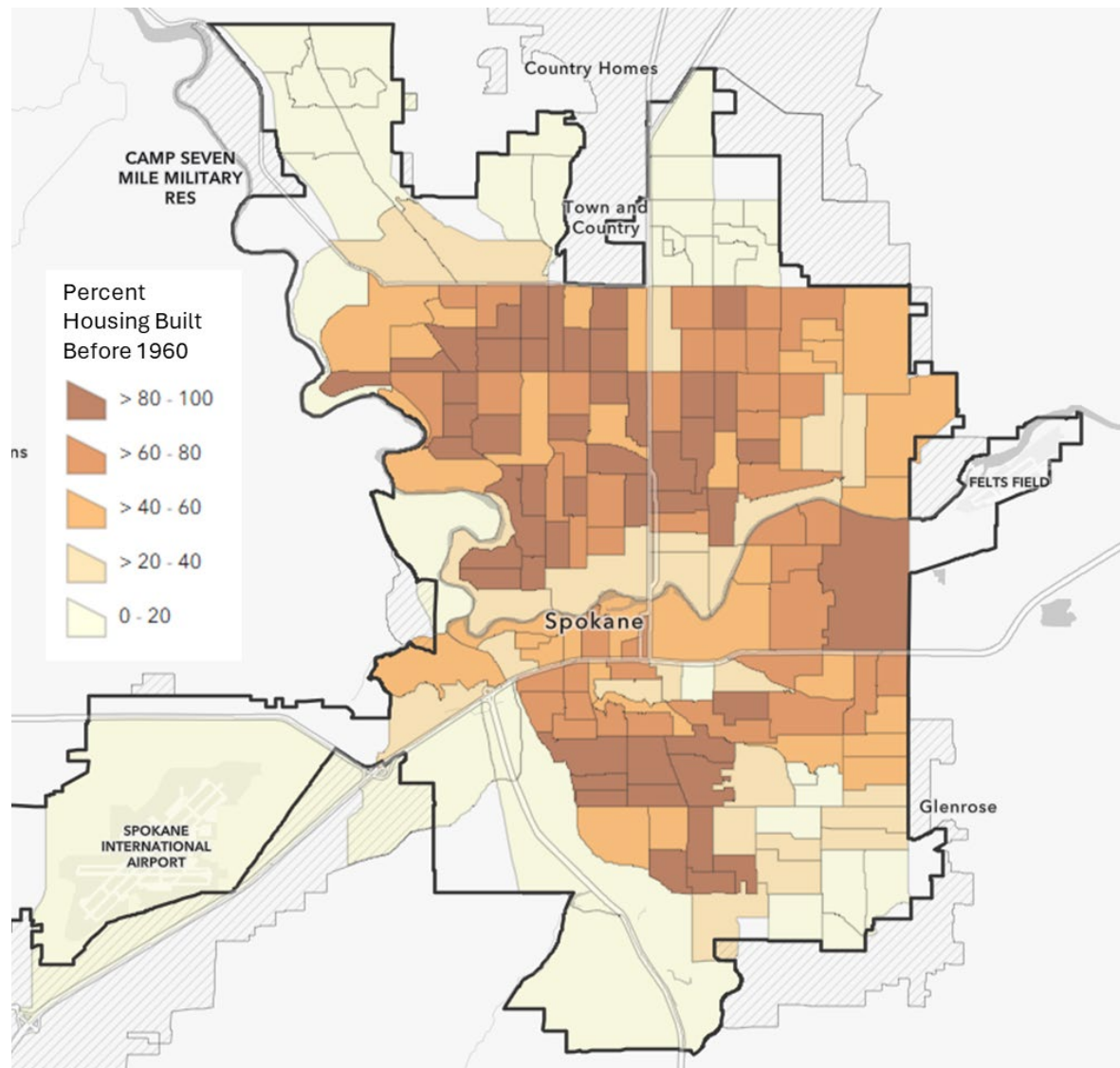


Source: City of Spokane; Spokane County Assessors Office, 2025. Note: Permits from 2020 – 2024 shown. Permitted units through 2040 projected based on 1,000 units a year, more conservative than current permitting.

Neighborhoods with older homes in Spokane do not always relate to poorer housing condition. Many of the older homes are in traditionally established single-family neighborhoods that developed in the early- to mid-1900s, have high rates of homeownership, higher household income, higher percentage of White, Not Hispanic or Latino population, and have quality of life amenities, like parks, high tree canopy coverage, and high performing schools. This is particularly present on the South Hill around Manito/Cannon Hill, Comstock, and Rockwood neighborhoods. [See Figure 76.](#)

Many of the areas with now older homes were not redlined but considered as most desirable on the HOLC maps and highlighted in the grade descriptions, which can be connected to higher investment and resources in these areas over time. [See Figure 77.](#) A similar pattern is also seen in pockets of West Central, Audubon/Downriver, Emerson/Garfield, and North Hill neighborhoods in North Spokane.

Figure 76. Housing Age before 1960



Source: Spokane Climate Vulnerability Index, 2025

Figure 77. HOLC Scan Area Description of A6, 1938

AVAILABILITY OF MORTGAGE FUNDS: a. Home purchase ample; b. Home building ample

CLARIFYING REMARKS: Highly deed restricted and zoned single family residential. Lot values \$12 to \$20 per front foot. The rugged terrain lends itself to the effective landscaping and the beautiful gardens for which the area is noted. Also notable is the excellence of architectural design, construction, and maintenance. Many families of wealth and position have their homes in this area which is one of the best in the city and is accorded a "high green" grade.

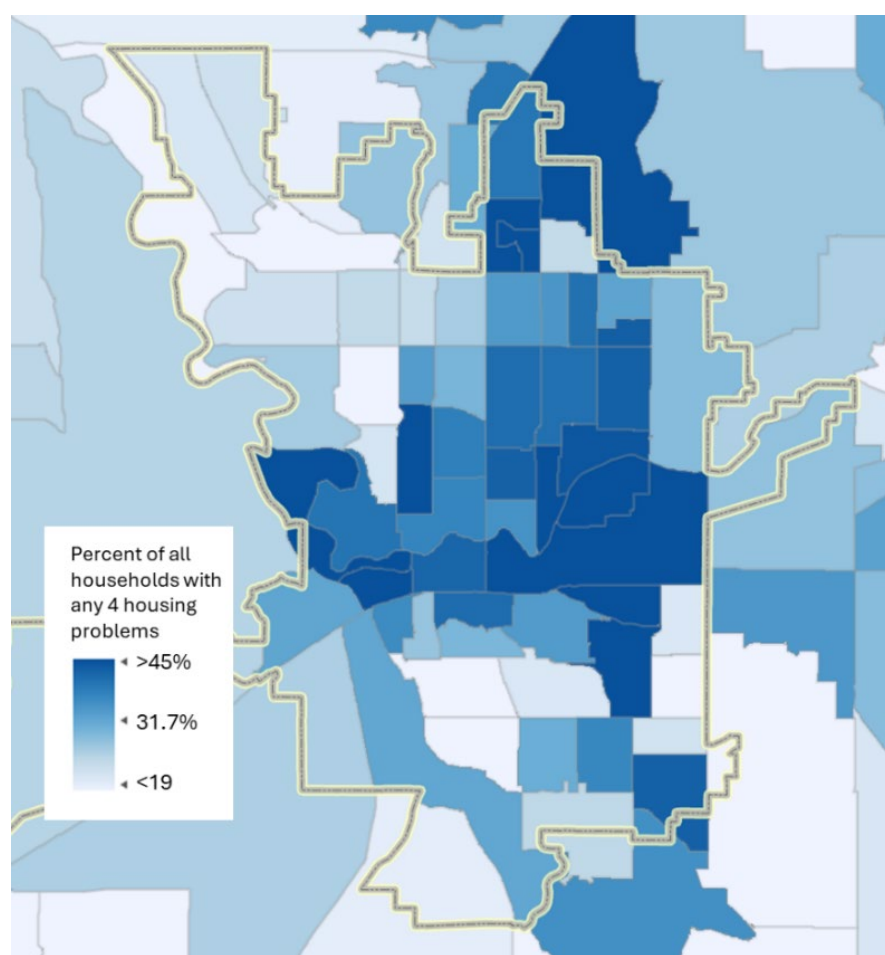
NAME AND LOCATION South Rockwood District, Spokane, W SECURITY GRADE A AREA NO. 6

Source: Mapping Inequality, University of Richmond

Housing quality can also be assessed by analyzing data identifying instances where “housing problems” exist. HUD provides information on housing problems that document the extent of housing problems and housing needs, particularly for low-income households, at the Census Tract level. The four housing problems are: incomplete kitchen facilities; incomplete plumbing facilities; more than 1 person per room; and cost burden greater than 30 percent.⁸⁰

Higher percentage of households with any one of the four housing problems are found in East Central, West Central, the lower South Hill, and northeast including Chief Garry Park and Shiloh Hills. See Figure 78. These areas also have a higher population of people of color, lower income households, and other indicators that suggest a disparate impact in housing quality and ability to repair those housing problems without risk of displacement.

Figure 78. Households with Housing Problems



Source: HUD ACS 5 YR CHAS Estimate Data by Tract, 2016-2020

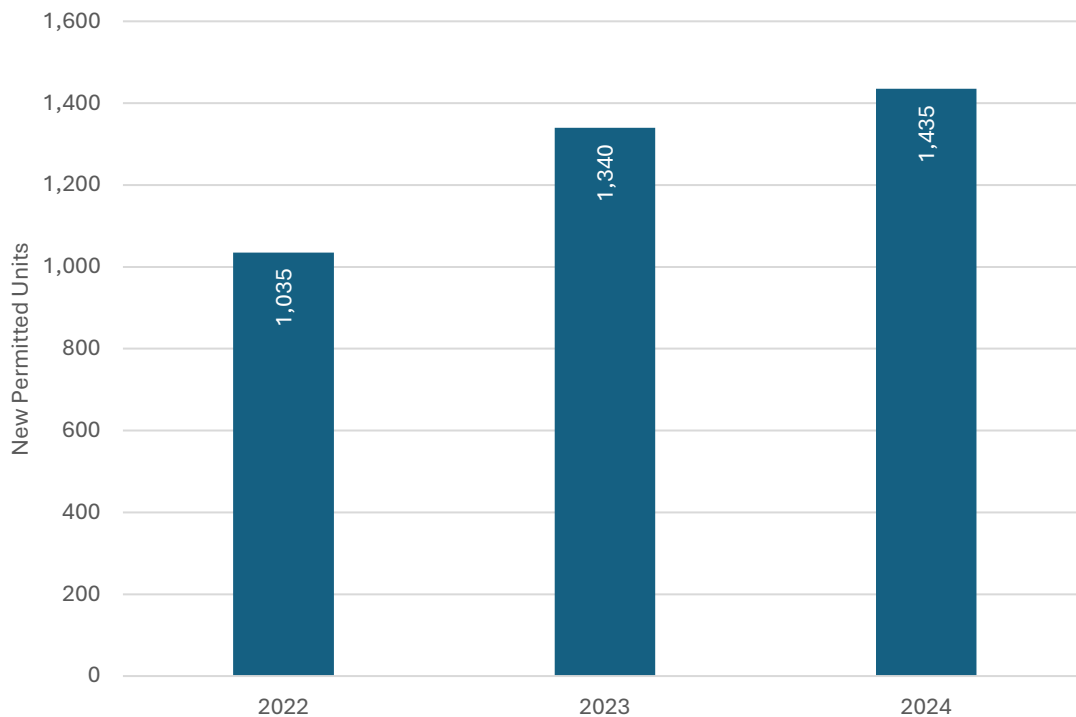
⁸⁰ Department of Housing and Urban Development (HUD). (2023). ACS 5 YR CHAS Estimate Data by Tract, 2016-2020. <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::acs-5yr-chas-estimate-data-by-tract/about>

7.5 Development Pressure

New residential construction, especially in areas seeing a rise in residential speculation, can make areas less affordable for existing neighborhood residents. Since 2022, the City of Spokane has permitted more new housing units each year than the year before. [See Figure 79](#). The highest concentration of new housing units permitted between 2022 and 2024 is in the East Central, Shiloh Hills, and Cliff-Cannon neighborhoods. [See Figure 80](#)

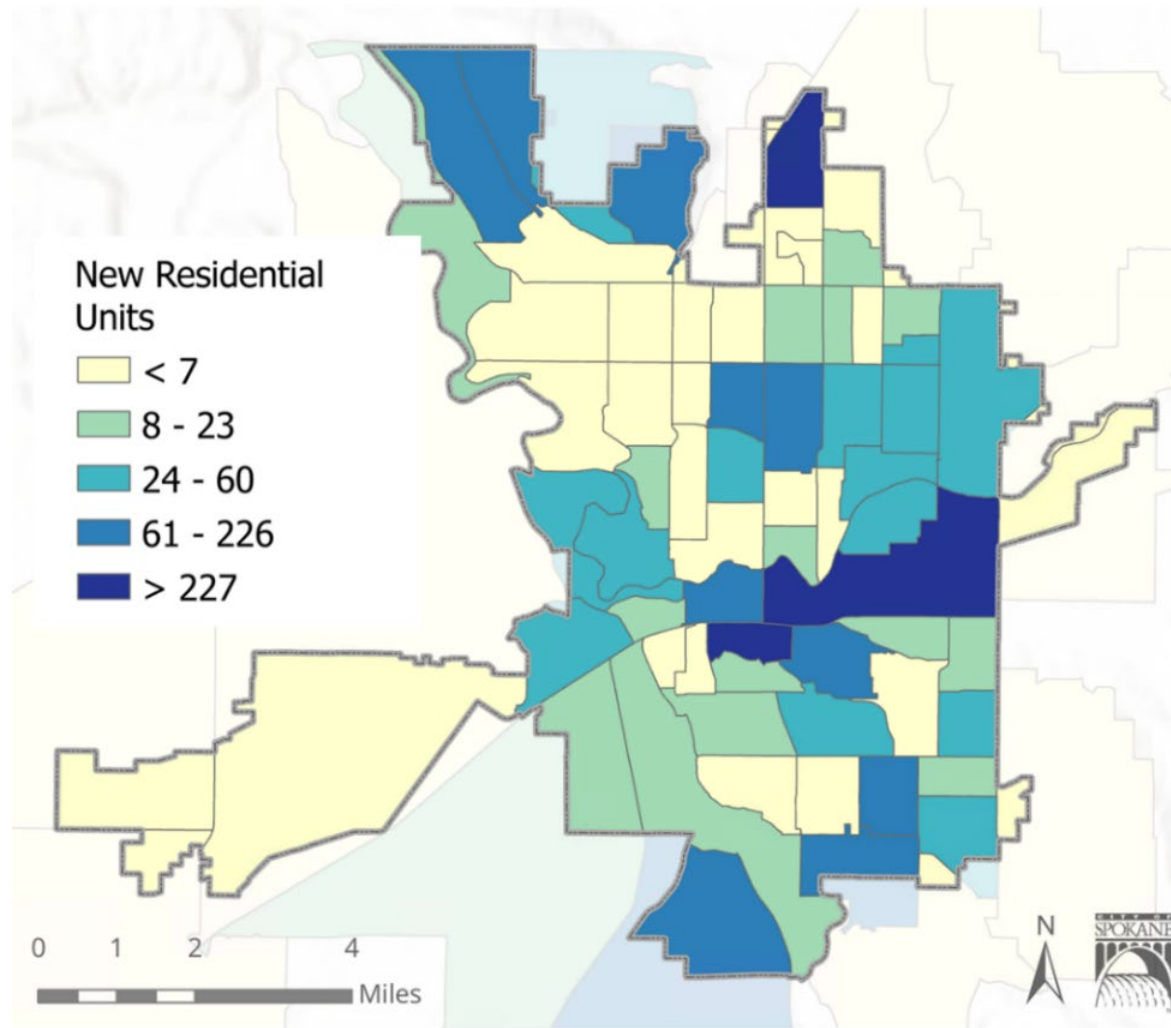
Redevelopment can also be a driver of displacement through the direct loss of units through demolition. Though there may be a net increase in housing units, in the short term, these units are generally less affordable than the units they are replacing, limiting a resident's ability to remain in their neighborhood. Under the City's most recent comprehensive plan and adopted zoning with changes made in 2024, additional development capacity exists throughout Spokane, especially in the central, southwest, and northeast areas.

Figure 79. New Housing Units Permitted, 2022-2024



Source: City of Spokane DSC, 2022-2024

Figure 80. New Residential Units, 2022-2024



Source: City of Spokane DSC, 2022-2024

7.6 Displacement Risk Assessment

The displacement risk assessment identifies if a specific population in a specific area is currently being, or is under elevated risk of being, forced out of the area based on factors outside of their control.⁸¹ Displacement risk was last mapped for the city of Spokane as part of the Housing Action Plan, adopted by City Council in 2021.⁸²

A displacement risk assessment includes a combination of measures that can be categorized into groups:

- **Sociodemographic measures** include variables that are associated with a higher risk of displacement such as households that rent their housing, have household incomes lower than other households in the area, are BIPOC, speak a language other than English or have lower educational attainment than adjacent areas. These factors are associated with greater housing vulnerability and structural barriers that decrease their ability to find and access replacement housing in the neighborhood should they be forced from their current housing.
- **Sociodemographic change measures** assess whether the pattern of change in the demographic profile of a neighborhood is diverging from the pattern of change in the jurisdiction.
- **Market change measures** include variables of housing cost and housing cost change in the area, typically compared to a larger market reference of the jurisdiction or the region. These may include some observations of whether the area was previously a low or high-cost area. Rising costs in previously low-cost areas suggest a higher displacement risk than rising costs in previously high-cost areas.
- **Proximity or presence of amenity measures** often include access to transit, parks, schools, libraries, and community centers. Change in the presence of amenities, particularly transit services, are regarded as predictive of increased displacement pressure.

Displacement risk analysis typically includes a map showing areas of higher risk of displacement. Measures to identify higher risk of displacement also includes a combination of inputs: **community engagement** with residents, developers, community-based organizations, housing agencies and other parties that would have knowledge of displacement; and **staff knowledge** of areas that have experienced redevelopment/displacement or how a change in zoning or regulations could influence the development feasibility of the area.

Commerce has provided a baseline statewide map of displacement risk at the Census tract level to support jurisdictions in meeting the new requirements of the housing element.⁸³ Displacement risk for this assessment builds off this work by integrating the following data factors:

⁸¹ Commerce, 2023a

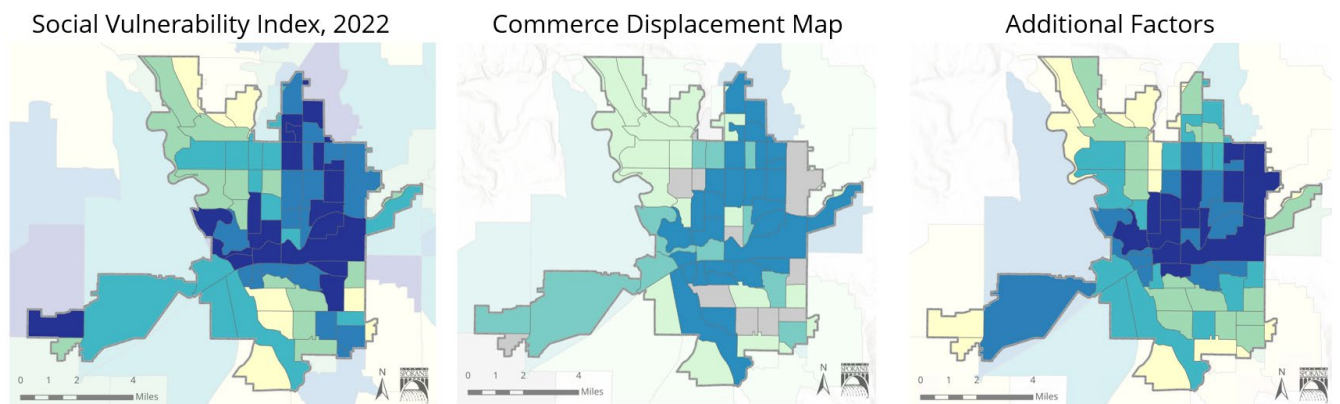
⁸² City of Spokane. (2021). *Spokane Housing Action Plan*. <https://my.spokanecity.org/housing/spokane-housing-action-plan/>

⁸³ Washington State Department of Commerce. (2023b). *Draft Displacement Risk Map*. https://experience.arcgis.com/experience/d26f4383cab3411cb45f39ddfc666b74/?data_id=83713d4b3ea34743bed49d3d61be4fb3-187dd75e9f2-layer-27-187dcfb6357-layer-4%3A499

- **WA Department of Commerce’s Statewide Displacement Risk Map.** This displacement risk analysis is modeled on the work of researcher and Portland State University Professor Lisa K. Bates (2013), which focuses on three factors to determine displacement risk based on demographic and market change: the social vulnerability of the residential population, evidence of demographic change, and market conditions (Bates, 2013).⁸⁴
- **Center for Disease Control’s (CDC) Social Vulnerability Index (SVI), 2022.** The CDC SVI provides vulnerability index values for all census tracts in the United States. The service includes an interactive map and ability to download the SVI scores across four dimensions of vulnerability: socioeconomic, household composition and disability, minority status and language, and housing type and transportation.⁸⁵
- **Additional Housing and Market Factors.** Additional factors that may impact displacement risk, but are not found within the previous data sets, include concentration of existing displacement, affordability, public infrastructure, and anticipated future development.

Each map input outlined provided a set of indicators which contribute to displacement risk. They were each weighted equally to create an overall index of displacement risk in Spokane. Census Tracts with unknown risk in the Commerce map were evaluated only on the remaining indicators. For those Tracts, the Commerce map was not used to develop the index score. [See Figure 81](#)

Figure 81. Displacement Risk Assessment Inputs



Source: City of Spokane; CDC Social Vulnerability Index, 2022; Department of Commerce Displacement Risk Map, 2023

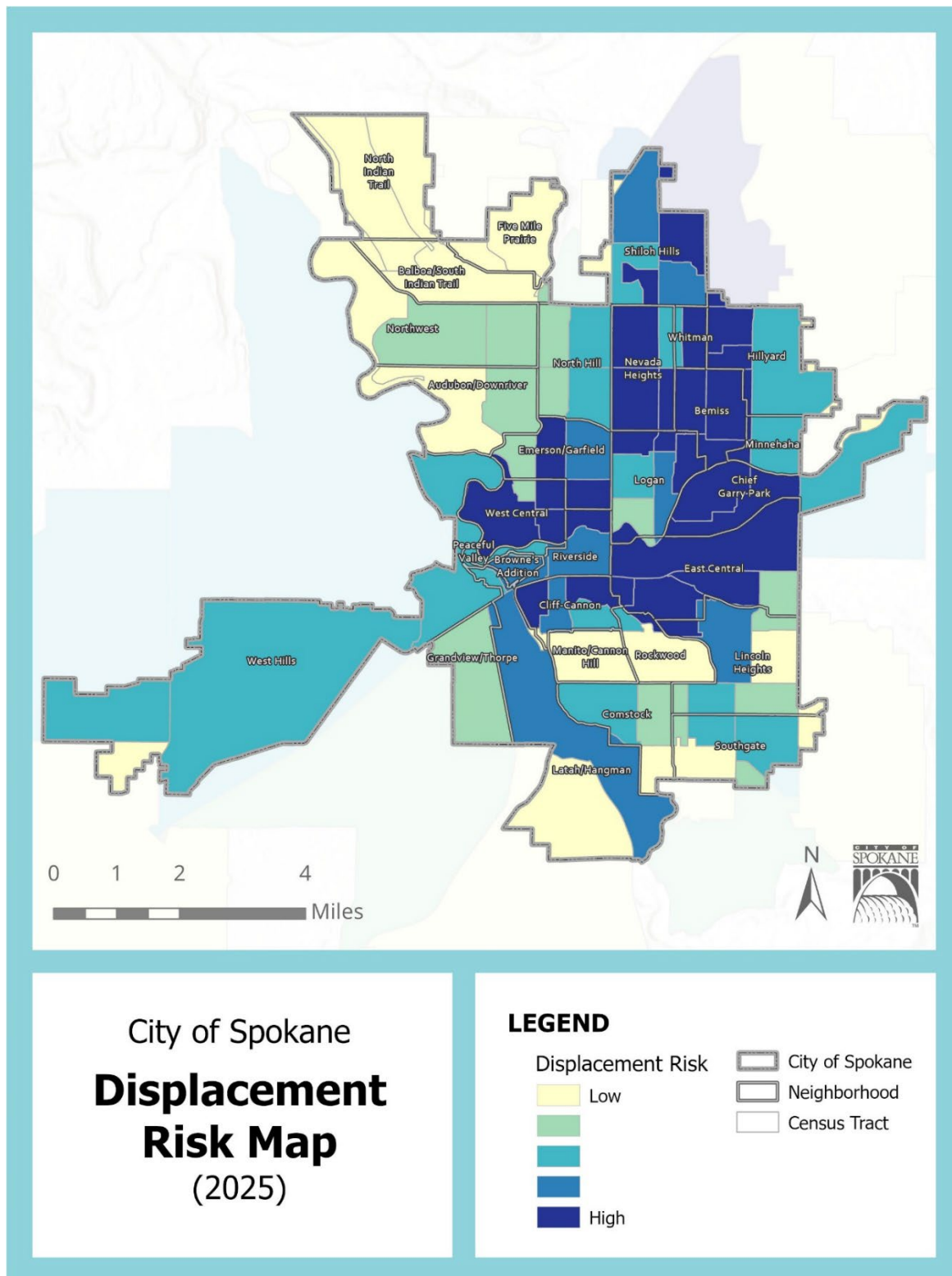
When combined into a single displacement risk assessment, all indicators point toward a higher displacement risk in Central and Northeast Spokane, with some variation. [See Figure 82 for Displacement Risk Map.](#)

⁸⁴ Bates, L. K. (2013). *Gentrification and Displacement Study: implementing an equitable inclusive development strategy in the context of gentrification*. Commissioned by the City of Portland, Bureau of Planning and Sustainability.

⁸⁵ Centers for Disease Control (CDC). *CDC/ATSDR Social Vulnerability Index (SVI)*. [2022] Database [Washington]. <https://www.atsdr.cdc.gov/place-health/php/svi/index.html>. Accessed 2025.

7.6.1 Displacement Risk Map

Figure 82. Displacement Risk Map, 2025



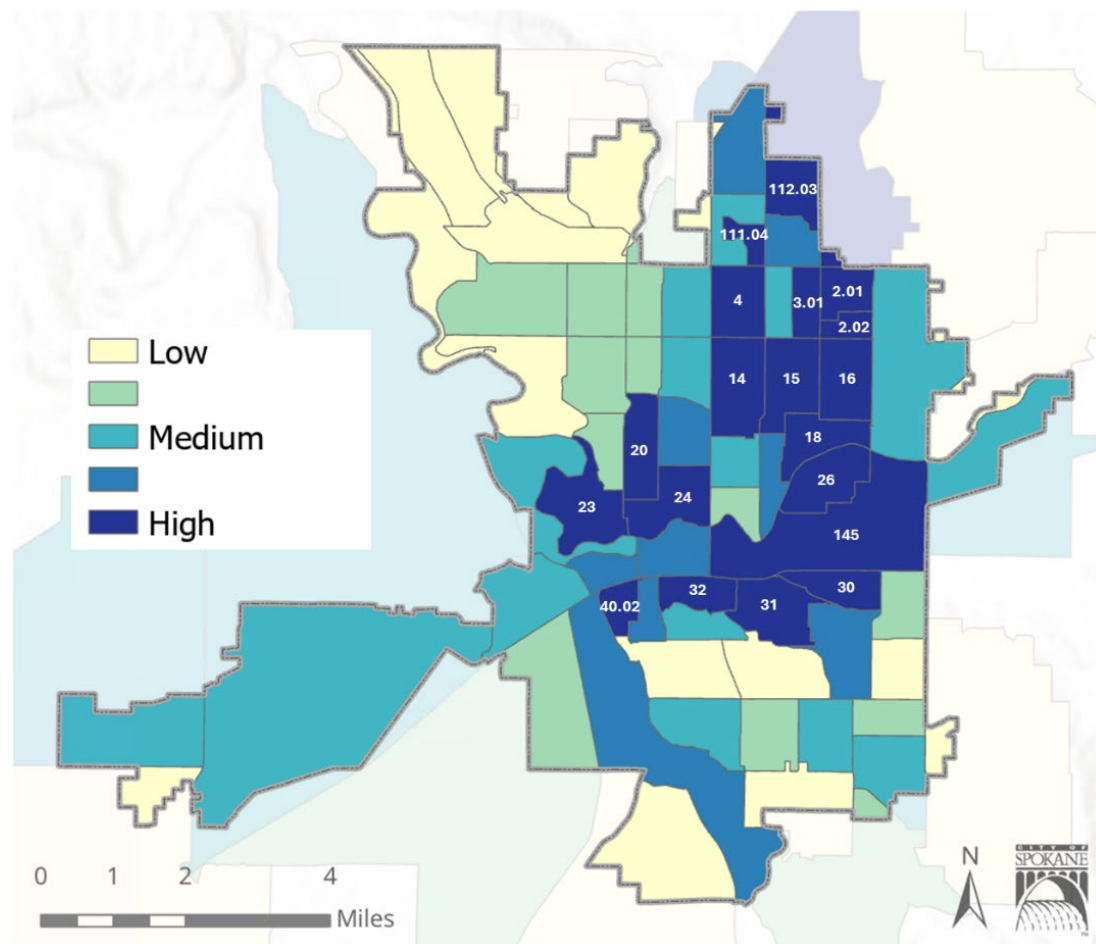
Highest Displacement Risk Census Tracts

For the highest displacement risk Census Tracts in Spokane, an average of 25.6% of the population is BIPOC, which is higher than the city level of 21.5%. [See Figure 83](#). The highest displacement risk Census Tracts have:

- 12 of 19 Census tracts (63%) have higher BIPOC populations and similar or lower White, Not Hispanic populations than the city level
- 18 of 19 Census tracts (95%) have a median household income lower than the city level
- 16 of 19 Census tracts (84%) have higher poverty rate than the city level
- 11 of 19 Census tracts (58%) had a higher percentage of population that had a different residence one year ago than the city level
- 14 of 19 Census tracts (73%) have a higher percentage of renter households than the city level
- 5 of 19 Census tracts (26%) have a higher percentage of homeowners than the city level

Table 6 features demographics and socioeconomics from the Census tracks ranked by the highest risk for displacement.

Figure 83. Highest Risk Displacement Census Tracts



Source: City of Spokane, 2025

Table 6. Highest Displacement Risk Census Tracts Socioeconomics

Lower than City Level				Similar or higher than City level			
Census Tract	White, Not Hispanic or Latino	BIPOC	Median Household Income	Poverty Rate	Different Residence 1 Year Ago	Owner Occupied	Renter Occupied
145	74.2%	25.8%	\$44,655	33.5%	23.3%	28.8%	71.2%
20	78.6%	21.4%	\$41,250	30.3%	14.7%	48.6%	51.4%
24	72.9%	27.1%	\$37,903	39.5%	38.1%	14.7%	85.3%
16	72.9%	27.1%	\$48,424	27.7%	11.9%	50.2%	49.8%
4	73.2%	26.8%	\$65,661	12.3%	18.9%	45.3%	54.7%
30	66.9%	33.1%	\$53,686	25.7%	16.0%	66.4%	33.6%
18	81.8%	18.2%	\$39,263	24.2%	18.2%	45.1%	54.9%
2.02	72.7%	27.3%	\$41,071	36.0%	28.9%	42.6%	57.4%
26	64.4%	35.6%	\$58,692	14.6%	12.9%	54.6%	45.4%
112.03	79.6%	20.4%	\$38,844	22.8%	11.8%	27.4%	72.6%
14	73.6%	26.4%	\$56,641	21.3%	22.9%	58.1%	41.9%
23	71.5%	28.5%	\$54,458	20.8%	15.6%	66.6%	33.4%
3.01	67.8%	32.2%	\$49,493	11.6%	14.4%	74.2%	25.8%
32	83.7%	16.3%	\$51,591	21.6%	34.3%	28.3%	71.7%
2.01	78.6%	21.4%	\$45,083	14.1%	15.2%	66.8%	33.2%
111.04	65.1%	34.9%	\$48,750	29.7%	26.8%	20.2%	79.8%
15	85.0%	15.0%	\$63,651	18.9%	22.5%	69.5%	30.5%
31	83.6%	16.4%	\$73,097	22.5%	24.6%	49.2%	50.8%
40.02	66.9%	33.1%	\$45,690	25.4%	28.8%	27.9%	72.1%
<i>Average</i>	74.8%	25.2%	\$48,750 <i>(Median)</i>	23.7%	20.6%	47.6%	52.4%
Spokane	78.5%	21.5%	\$65,745	14.6%	18.2%	58.3%	41.7%

Source: City of Spokane; U.S. Census Bureau, ACS 5-Year Estimates, 2019-2023

8. Policy Evaluation

8.1 Housing Element Policy Evaluation

To ensure existing policies no longer exacerbate disparate impacts, WA Commerce provides guidance on how to evaluate policies for racially disparate impacts. **Following the guidance, once jurisdictions have identified if there is evidence of racially disparate impacts, displacement, and exclusion in housing, the next step is to review goals, policies, and regulations to assess whether policies contribute to those impacts.**

The first lens for policy evaluation focuses on actions the policies support or prohibit, using the questions below for consideration. The second lens focuses on the narrative effect of the policy and whether it furthers harmful biases about groups of people and communities. Racial bias is a predisposition for or against based on unconscious associations about people based on race, whether intentional or unintentional. Jurisdictions are expected to review each goal and policy in the existing Housing Element for terminology that encodes bias, racially informed presumptions or phrases that promote exclusion.

Questions for Consideration:

- Is the policy effective in accommodating needed housing?
- Does the policy contribute to racially disparate impacts? Displacement? Exclusion in housing?
- Who benefits and who is burdened by the policy?
- Does the policy increase displacement risk? If so, can this be mitigated through policies or actions?
- Does the policy provide vulnerable communities protection from displacement?
- Does existing terminology encode bias, racially informed presumptions or phrases that promote exclusion?

Evaluation Criteria

RDI Criteria	Evaluation	Code
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.	Supportive	S
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.	Approaching	A
The policy may challenge the jurisdiction's 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.	Challenging	C
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.	Not Applicable	NA

Housing Element Policy Evaluation

Policy	Discussion	RDI Criteria	Analysis
<i>Policy from the Comprehensive Plan as of Sept 2025</i>	<i>Discussion underneath policy in the Comprehensive Plan. This is not the policy but adds context to understand intent.</i>	<i>Criteria for advancing RDI</i>	<i>Draft staff analysis for consideration of policy intent, outcomes, focus, and relevancy.</i>
H 1 HOUSING CHOICE AND DIVERSITY Goal: Provide opportunities for a variety of housing types that is safe and affordable for all income levels to meet the diverse housing needs of current and future residents.			
H 1.1 Regional Coordination Coordinate the city's comprehensive planning with other jurisdictions in the region to address housing-related needs and issues.	Discussion: It is critical to maximize the effectiveness of scarce public resources in improving housing opportunities throughout the region with coordination and management programs across jurisdictional boundaries.	A	Policy supports regional coordination to efficiently address housing needs, which is supportive of providing housing opportunities to all residents. However, the policy could focus more directly on addressing housing needs, leaving coordination as a tool, but not the focus of the policy itself.
H 1.2 Regional Fair Share Housing Participate in a process that monitors and adjusts the distribution of low income housing throughout the region.	Discussion: An issue within the greater Spokane region is the distribution of affordable housing for all income groups. Areas that continue to accommodate large shares of the low-income housing market have higher demands to satisfy social health and service needs. A regional process that periodically monitors progress toward achieving the region's housing goals and makes adjustments to policy, programs, and land use plans helps bring about the desired distribution of housing cost diversity.	C	Policy supports regional coordination of provision of low-income housing, which supports housing options where people might want to live. While the Discussion text is meant to clarify the need for other jurisdictions, <i>in addition to</i> the City of Spokane, to provide adequate affordable housing, the language could be misinterpreted as challenging the requirement to provide low-income housing as too costly.
H 1.3 Housing Employer-Sponsored Provide incentives	Discussion: Housing should be available near employment areas in order to provide transportation options, to increase	A	Policy supports reducing commute burden by developing affordable housing close to jobs and referencing in the discussion those most impacted by commute burden.

for employers to sponsor or develop affordable housing in proximity to their place of employment.	accessibility to employment for those most in need and least able to afford personal vehicle transportation, and to create shorter trips.		It does not specifically refer to low-income or marginalized groups, leaving intent of benefits uncertain. Could include language about prioritizing historically marginalized areas and integrating anti-displacement mitigation measures to protect current housing stock affordability and prevent increased housing costs. Could be further be paired with affordability criteria and stronger incentives direction to provide more policy direction.
H 1.4 Use of Existing Infrastructure Direct new residential development into areas where community and human public services and facilities are available.	Discussion: Using existing services and infrastructure often reduces the cost of creating new housing. New construction that takes advantage of existing services and infrastructure conserves public resources that can then be redirected to other needs such as adding amenities to these projects.	A	Policy supports making housing development more affordable by focusing development on infill and where infrastructure and services (schools, transit, healthcare) already exist. Could potentially increase displacement if already well-served areas are higher in cost and have desirable amenities, as these areas historically have been less accessible to racial groups and lower income households. Anti-displacement measures should be considered to preserve residents in well-served areas while also protecting residents in areas that receive new infrastructure upgrades. Policy could also clarify the City's commitment to equitable distribution of services citywide.
H 1.5 Housing Information Participate in and promote the development of educational resources and programs that assist low and moderate-income households in obtaining	Discussion: A lack of financial literacy or how to obtain housing and home financing is often an impediment to finding and maintaining suitable housing. A place such as a resource center where financing assistance is available and home purchasing techniques are taught can help households find suitable housing.	S	Policy supports educational resources to raise awareness and increase access to important housing information for historically marginalized communities. Could be made stronger by including additional focus on culturally relevant education, partnerships with community-based organizations serving BIPOC communities, and translation of materials. May help reduce displacement risk by supporting housing access and stability.

affordable and suitable housing.			
H 1.6 Fair Housing Promote compliance with fair housing laws.	Discussion: Provide information to the general public about their rights and obligations under the fair housing laws and the grievance procedures available in case of violation. The city should document and forward violations of state and federal civil rights laws related to housing to the appropriate authorities.	S	Policy recognizes fair housing in housing, which is rooted in anti-discrimination and removing barriers to housing. This helps reduce racially disparate impacts and exclusion by protecting protected classes from discriminatory housing practices. Could be made stronger by changing "promote" language to focus on requirements, identifying anti-discrimination measures, and integrating specific policies from the Fair Housing Plan into the Comprehensive Plan, particularly policies addressing BIPOC households and income levels most impacted by fair housing issues. Also, the creation of the Office of Civil Rights, Equity, and Inclusion in 2023 and the Human Rights Commission helps track civil rights violations for reporting. Mention of these kinds of bodies in the policy, as sources for promoting these ideals, could strengthen the policy.
H 1.7 Socioeconomic Integration Promote socioeconomic integration throughout the city.	Discussion: Socioeconomic integration includes people of all races, color, religion, sex, national origin, handicap, disability, economic status, familial status, age, sexual orientation, or other arbitrary factors. Often, housing affordability acts as a barrier to integration of all socioeconomic groups throughout the community.	S	Policy supports socioeconomic integration of different economic backgrounds throughout the city. Should increase access for low-income households to higher opportunity areas to expand housing choice and options. The language is vague overall and could be more direct in language around diversity, equity, and affordability by including language from the Discussion into the policy. Could also include language about access and opportunity. Similar to H 1.9 so could be revised and combined.
H 1.8 Affordable Housing Requirement	Discussion: Requiring that affordable housing be incorporated in every new housing development helps	S	Policy directs affordable housing be integrated into all new developments, and the Discussion references reversing economic

Include a percentage of affordable housing within all new developments that include housing.	reverse the economic segregation trends within the city. This has the positive effect of integrating households of varying incomes. Housing types such as smaller homes on smaller lots or townhouse structures should be allowed to accommodate this requirement. This housing should be priced so that it is available to households that earn up to eighty percent of the countywide median household income.		segregation. Reduces exclusion by ensuring affordable housing is part of new developments in various neighborhoods, identifying an AMI target. Could be made stronger to include language addressing racial segregation as well. Mandating affordable housing into developments would further create mixed income housing, not singling out affordable development only but supporting integration to give people of all income levels more choices.
H 1.9 Mixed-Income Housing Encourage mixed-income developments throughout the city.	Discussion: Mixed-income housing provides housing for people with a broad range of incomes on the same site, development, or immediate neighborhood. Mixed-income housing provides socio-economic diversity that enhances community stability and ensures that low-income households are not isolated in concentrations of poverty.	S	Policy supports integration of different economic backgrounds and diversity throughout the city and addresses the need for community stability in the Discussion. Could be made stronger by adding some Discussion language into the policy language to be more direct about diversity and focusing on historically disenfranchised neighborhoods to overcome socioeconomic isolation and loss of community wealth building, particularly when paired with anti-displacement measures. Similar to H 1.7 so could be revised and combined. In discussing mixed-income housing, focus on moderate income housing could help broaden to include workforce housing, which can help increase housing options and support the stability of mixed-income housing.
H 1.10 Lower-Income Housing Development Incentives Support and assist the public and private sectors to	Discussion: When addressing the housing needs of lower-income households, public funding, incentive programs, and technical help may be needed in order for housing development projects to be successful. Local incentives	A	Policy is focused on developing lower income housing for households not typically supported in the market, which when implemented can directly increase the supply of subsidized and lower-income housing and address gaps where market-rate housing is unaffordable. This supports low-

develop lower-income or subsidized housing for households that cannot compete in the market for housing by using federal, state, and local aid.	to lower or subsidize the cost of developing new housing may include density bonuses, fee exemptions, priority permit processing, property tax deferral, increased options in housing types, and inclusionary zoning requirements.		income households, which also supports opportunities for lower income BIPOC households to access housing with more options and programmatic support. There is a growing gap in supporting development for moderate income households at the 80-120% AMI, so this could be recognized further or be focused on in a separate policy. Funding is going to the developer and housing providers, so additional policy focus could be on supporting residents with rental assistance and other programs that benefit residents directly.
H 1.11 Access to Transportation Encourage housing that provides easy access to public transit and other efficient modes of transportation.	Discussion: Transportation is the second largest expenditure after housing and can range from 10 to 25 percent of household expenditures. Examining where housing is located and the associated transportation costs may provide a more realistic evaluation of housing affordability in the future.	A	Policy addresses high cost of transportation on households and promotes reducing commute burden. This is supportive of nearly all households in the city, but particularly lower income and renter households which have higher rates of cost burden. Could contribute to displacement in transit-rich areas due to rising demand, access to services, and desirably, particularly if housing affordability is not preserved. Should clarify inclusion of all income levels and accessibility needs or emphasis on providing benefits to historically marginalized communities or areas with historic disinvestment to avoid exclusion.
H 1.12 Affordable Housing Funding Sources Support the development of affordable housing development funding sources.	Discussion: Lower-income housing development funding sources may include but are not limited to a community land trust, trust fund, mortgage revenue bonds, levies, or low-income housing tax credits.	A	Policy is supportive of affordable housing and addressing ways to identify funding through different housing models. The Discussion includes many policy solutions that could be fleshed out further to give better direction in the comprehensive plan for what the city will prioritize. Additionally, the relationship between this policy and H 1.10 should be better understood and refined, as they call for similar action on the part of the City and

			others. Affordable housing typically focusing on low income may create gaps for moderate income households that typically don't qualify for supportive funding. As housing prices rise, the need to support moderate income households is also growing. This could be included here or developed in another policy.
H 1.13 Siting of Subsidized Low-Income Housing Set clear site selection criteria for publicly subsidized housing to minimize geographic concentrations of publicly subsidized housing projects in neighborhoods with a high percent of minority or low-income households.		A	Policy acknowledges consideration of siting publicly subsidized housing to help integrate neighborhoods. Providing subsidized housing in higher income areas in addition to supporting housing options in lower income areas provides the most options for households to find housing that fits their needs. Policy could be enhanced by being more direct at integrating affordable housing that supports low income as well as moderate income into higher income neighborhoods while also acknowledging the historic practices of redlining and racially restrictive covenants that limited housing options for BIPOC and low-income households and segregating higher income, White neighborhoods. Site selection criteria should integrate RDI analysis to ensure impacts are addressed.
H 1.14 Building, Fire, Infrastructure, and Land Use Standards Review periodically and, when needed, revise building, fire, infrastructure, and land use standards and requirements to	Discussion: City standards need to be reviewed periodically to ensure that they are efficient, cost effective, reflect current technology, and maintain the goal of affordable housing.	A	Policy has the potential to address displacement risk by keeping housing affordable. Need to clarify "community standards" so that it is not discriminating against racial groups that may be different from dominant culture.

ensure community standards are implemented and that new or rehabilitated housing remains affordable.			
H 1.15 Performance Standards Create a flexible project review process that allows for the use of alternative standards, but only if their use results in a project that is equal or superior to using existing standards.	Discussion: Often several ways of achieving a standard exist. Health and safety concerns must be preserved but flexibility in how to achieve the desired standard is needed. A review process should be available to address a proposed development practice that is different from the existing development standards. When the proposed development practice is demonstrated to achieve the same ends as those prescribed in the existing development standards, the procedure should be approved. Different methods should be allowed when the results of the development practice achieve identical results in comparison to the prescribed standards. In many cases, allowing alternative development methods to be used can reduce development costs.	NA	As currently worded, this policy concerns itself with development standards and design requirements for housing. While these topics are important, they have less direct impact on BIPOC residents. The topic here is not where housing is constructed or how much, thus it's impact on RDI and Displacement topics is limited. That said, flexibility in standards can extend to topics of RDI and Displacement concern, thus this policy is worth mentioning.
H 1.16 New Manufactured Housing Permit manufactured homes on individual lots in all areas where	Discussion: Courts have ruled against discriminatory ordinances which restrict the location of Uniform Building Code compliant manufactured housing. Manufactured housing cannot be regulated	S	Policy supports manufactured homes in all residential areas, which can help lower the barrier to entry for lower-income households and increase housing options for all. Could be made stronger include focus on mobile home preservation and consideration of community-owned models so residents are able

residential uses are allowed.	differently than on-site built housing.		to build equity and ownership. It is worth considering a policy calling for updated manufactured home standards in Spokane that allow for a greater amount of diversity in type, construction, and location. Currently, the City limits manufactured housing to double-wide housing, excluding many modern types that might lower barriers to homeownership for all parts of the community.
H 1.17 Partnerships to Increase Housing Opportunities Create partnerships with public and private lending institutions to find solutions that increase opportunities and reduce financial barriers for builders and consumers of affordable and lower-income housing.		S	Policy supports affordable housing partnerships to increase housing opportunities. No solutions identified, so could give better direction on how to increase opportunities and reduce financial burdens. Could be further enhanced to support partnerships with BIPOC organizations and support workforce development and training to build up more BIPOC individuals in the development, construction, real estate, finance, and other private sectors. Again, consideration of moderate income housing for homeownership opportunities to address a growing gap in supportive policies and funding sources.
H 1.18 Distribution of Housing Options Promote a wide range of housing types and housing diversity to meet the needs of the diverse population and ensure that this housing is available throughout the community for people of all	Discussion: A variety of housing types should be available in each neighborhood. Diversity includes styles, types, size, and cost of housing. Many different housing forms can exist in an area and still exhibit an aesthetic continuity. Development of a diversity of housing must take into account the context of the area and should result in an improvement to the existing surrounding neighborhood.	S	Policy supports housing options in every neighborhood, which promotes integration of housing types and can ultimately support integration of people. Includes reference to diversity and could be made stronger to promote housing opportunities that meet the needs of communities of color, different cultural backgrounds, and accessibility. Language should be included from discussion to bolster emphasis on all neighborhoods. Updating outdated language around special needs will need to be more inclusive. Discussion language on

income levels and special needs.			context and improvements to existing neighborhood should be cautious to not leave higher-income, White neighborhoods unchanged or in some way “protected” from change.
H 1.19 Senior Housing Encourage and support accessible design and housing strategies that provide seniors the opportunity to remain within their neighborhoods as their housing needs change.	Discussion: Accessory dwelling units, condominiums, and existing home conversions within centers are examples of other arrangements that reduce maintenance worries and increase access to services.	S	Policy supports accessible design standards for aging in place and addresses displacement risk, though not directly. Policy ideas can also be applied to all to support people of all incomes, racial groups, and abilities to remain in their neighborhood as housing needs change. Could be expanded to include focus on universal accessibility standards that support everyone at all life stages. Housing types referenced in the discussion are not just solutions for senior housing but housing types that could be affordable options for all households. The policy should highlight the need for proximity to health and community services, design standards that promote physical as well as financial accessibility, and the idea that multi-generational housing is as beneficial to a neighborhood as is diversity of housing in general.
H 1.20 Accessory Dwelling Units Allow one accessory dwelling unit as an ancillary use to single-family homes in all designated residential areas as an affordable housing option.	Discussion: Accessory dwelling units (ADUs) increase the amount and variety of available affordable housing. Increasing the variety of housing can help to satisfy changing family needs and the trend of smaller households. ADUs help provide an avenue for seniors, single parents, and families with grown children to remain in their homes and neighborhoods while obtaining extra income, security, companionship and	A	Policy supports more housing options for all, but needs to be updated with current regulations allowing two ADUs per lot and code language to be more inclusive. This was addressed previously in the Building Opportunity and Choices for All and Building Opportunity for Housing initiatives that addressed zoning changes to allow for more housing types across all residential zones. As SMC 17C.300 outlines, ADUs can increase the housing stock and provide a mix of housing that responds to changing family needs and smaller households, and provide a broader range of

	services. Often ADUs allow a more efficient use of existing housing and infrastructure. Accessory dwelling units should be built in a manner that does not adversely affect the neighborhood. They should be designed to be physically and visually compatible with surrounding structures.		accessible and more affordable housing. Policy should be updated to reflect current policy direction and language. Also of note is that allowing for ADUs does not address affordability directly or availability of long-term rental options. ADUs could contribute to displacement risk if ADUs lead to increased property values or rents without mitigation. The policy could be enhanced to reflect affordable housing goals and reduce the impacts of short-term rentals on housing options. This policy should also be reviewed to ensure an equitable distribution of benefits and burdens across neighborhoods. An additional opportunity exists here for a new policy calling on the City to continue its efforts towards making ownership of ADUs separate from the primary home possible, as this could provide another avenue for homeownership citywide.
H 1.21 Development of Single-Room Occupancy Housing Allow development of single-room occupancy units in downtown Spokane and in other areas where high-density housing is permitted.	Discussion: Single-room occupancy (SRO) housing contains units for occupancy by one person. These units may contain food preparation areas, sanitary facilities, or both. Due to their small size, SRO units are less expensive to rent than regular apartments, so they often serve as the only affordable housing option for many lower-income individuals. Maintaining and increasing the supply of SRO housing is an important part of the lower-income housing market.	A	Policy supports single-room occupancy housing as a housing option. Current regulations allow SROs anywhere hotels are allowed. To meet HB 1998, adopted in 2024, the City will need to allow SROs in all residential zones except RA. SROs historically have been a part of the housing stock for people at various life stages, and inclusion of this option allows for people who are not able obtain other forms of housing as an affordable and accessible housing option. Housing quality needs to be considered critical to this to ensure housing conditions are maintained with public health and safety, integrity, and dignity for residents. Could be part of a solution to address homelessness.
H 1.22	Discussion: Both the Growth Management Act and	A	Policy acknowledges need for housing supportive for people with

Special Needs Housing Encourage the retention, inclusion, and development of special needs and assisted living housing.	Countywide Planning Policies require that essential public facilities be fairly and equitably distributed. This applies within jurisdictions, as well as between neighboring jurisdictions. This policy does not apply to criminal or prerelease transitional housing.		disabilities by increasing stable housing. Individuals living with a disability experience inherent barriers to accessing housing and there is a high need for more accessible units for people with disabilities and policies to ensure units are accessible or modified to be accessible. Policy should include universal design standards in all housing by moving away from segregated housing to include independent living and housing options that expand where people can live not limit it. Language needs to be updated to be more culturally inclusive by changing to first-person language. Additional Discussion includes references to criminals, which perpetuates inaccurate and harmful stigma towards people with disabilities and should be removed. The policy should also mention the need for housing to be of the same quality and standard as other housing, avoiding development of substandard housing targeted at vulnerable communities.
H 1.23 Distribution of Special Needs Housing Include units that are affordable for low-income special need families in all housing developments.	Discussion: Adequate housing for special needs populations is in very short supply. New units required within housing developments help fill this need while also helping to distribute the supply of special needs housing throughout the community.	A	Policy is supportive of inclusion and integration of accessible housing into neighborhoods. Language needs to be updated to be more inclusive. Policy should avoid concentrating housing in isolated areas, which can reinforce segregation. Focus should be enhanced to include affordable accessible housing that meets the needs of people with disabilities. The Spokane Fair Housing Plan found that most accessible units are in newly constructed multi-family housing. People with disabilities are often limited to residing in rental units in zones which allow multi-family housing. Policy should support more housing types for

			people with disabilities to find housing that meets their needs.
H 1.24 Taxes and Tax Structure Support state consideration of property tax reform measures that provide increased local options that contribute to housing choice and diversity.	Discussion: Other methods of taxing land have shown different effects on the long-term use of land. Local options for property taxation methods furnish increased tools to guide the health and development of the region. Providing tax relief for low-income housing improvements is one way to encourage community revitalization. Tax increment financing is also a tool for housing improvement in target areas. Taxing land based upon the current use of residential property rather than taxing land on the basis of the highest and best use can help preserve lower-income housing. Developing a tax structure that does not hinder home and land improvements will encourage community revitalization.	A	Policy supports tax relief for low-income households. This can lower household costs, which can minimize displacement risk for low-income households and historically impacted BIPOC communities. One concern raised by this policy is the City's limited ability to control the overall tax structure—language requires update to better represent what is possible rather than an aspirational goal that is unreachable.
H 2 HOUSING QUALITY Goal: Improve the overall quality of the City of Spokane's housing.			
H 2.1 Housing Rehabilitation Provide assistance for housing rehabilitation beyond housing maintenance code requirements if the assistance is supportive of general community development		S	Policy is supportive of preserving and improving existing housing stock, potentially increasing safe and affordable housing availability without requiring new construction. Also supports anti-displacement measures by emphasizing financial solutions to help people stay in their homes. Could be clarified to be more focused on anti-displacement.

activity and is on a voluntary basis.			
H 2.2 Property Responsibility and Maintenance Assist in and promote improved and increased public and private property maintenance and property responsibility throughout the city.	Discussion: Recognition of “good” property owners can help set the standard for others to follow. The city should lead by example and maintain its property to community standards, at a minimum. Additionally, the city should continue to support and fund the repair and rehabilitation of single-family and multifamily housing using federal, state, and local funding sources. Emergency code compliance loans are another method of maintaining standards. When other methods of maintaining minimum community standards fail, a strong code enforcement program is needed to protect surrounding property owners. Enforcement of city codes should not depend solely on complaints filed by neighbors but should be driven by the city’s awareness of a violation.	C	Policy supports neighborhood stability, which can support housing retention and community pride. Policy discussion uses coded language around “good property owners” that can reinforce emphasis on dominant culture and who is considered a good property owner by rewarding or targeting certain groups. Policy needs to balance code enforcement with proactive measures to help people address property maintenance to further avoid reinforcement of disparities. Policy should be updated to focus on recent City efforts to integrate proactive code enforcement, like rental registries, and steps to avoid foreclosure and demolition.
H 2.3 Housing Preservation Encourage preservation of viable housing.	Discussion: Housing that is susceptible to redevelopment is often serving lower income households and is an important part of the housing mix within the city. Future sub-area plans should preserve existing viable housing outside of designated center or corridor environments where redevelopment and intensification are encouraged. Often the	A	Policy is focused on anti-displacement. Could integrate language to be emphasize the concept of displacement and the need to mitigate and prevent. Could address areas at highest risk of displacement, and communities most impacted by RDI. Should also expand as a tool not just limited to subarea planning, but throughout the city. Should revise and expand with a stronger set of anti-displacement policies. Beyond anti-displacement, retention and maintenance of existing housing can

	housing that is destroyed cannot be replaced by new housing elsewhere at the same cost level. Sub-area plans should permit the transfer of unused development rights from low-income housing to eligible sites elsewhere in the planning area or the city as a preservation strategy. Information about soon-to-be-demolished housing should be made available to the public, such as on the internet, so that concerned housing-related groups can determine if there are alternatives to demolition when the structure is worth preserving. Options might include purchase of the property or relocation of the housing.		support current affordability of housing, in that even those older units that are well maintained and cared for are generally rented at a lower level than newly constructed housing. The affordability aspect of this policy can benefit all of the community, BIPOC households included.
H 2.4 Linking Housing With Other Uses Ensure that plans provide increased physical connection between housing, employment, transportation, recreation, daily-needs services, and educational uses.	Discussion: The location of housing in relation to other land uses is a part of what determines the quality of housing. The desirability and viability of housing changes for different segments of the community, based on an area's mix of land uses. As complementary land uses become spread further apart, transportation options decrease while transportation costs increase. These added transportation costs reduce the amount of household income available for housing and other household needs. This affects lower-income households first. In urban areas, basic services, such as	A	Policy supports fostering efficient land use that can improve access to housing near key amenities. Acknowledges how housing is integral to a community, and how access to housing can limit or enhance access to other resources, services, and opportunities. Redlining, racially restrictive covenants, and historic zoning practices created the inequities across neighborhoods, so addressing this is critical to ensuring people have well-resourced neighborhoods wherever they live. Policy could be revised to refocus on equity and ensuring all have access to amenities that support their needs, so that improved connectivity does not increase displacement risk from increased property values and rents. It's important to note that several policies in the Social Health

	grocery stores, public transportation, and public parks, should be available within a mile walk of all housing.		and Neighborhoods chapter support the goal of this policy and enhance its effectiveness and application.
H 2.5 Housing Goal Monitoring Provide a report annually to the City Plan Commission that monitors progress toward achieving the housing goals and includes recommended policy change if positive direction toward achieving the housing goals is not occurring.	Discussion: Using readily available datasets as a basis for a simple set of indicators can illustrate progress that has been made to achieve housing goals and policies and provide assistance in determining what actions are needed to implement the goals and policies and whether revisions to the policies are needed. The public can provide feedback about the indicators that are most important to them.	A	Accountability and transparency is an important part of addressing disparate impacts. RDI analysis should be included in any reporting to ensure the city is moving forward on addressing the impacts and that policies are supporting the outcomes intended and not creating new impacts.

8.2 Spokane Housing Action Plan

The City Council adopted the Spokane Housing Action Plan in 2021, with the support of Washington Department of Commerce guidance and grant funding, to help identify actions that the City can consider to promote greater housing diversity, affordability, and access to opportunity for residents of all income levels in Spokane.⁸⁶ The Housing Action Plan (HAP) followed a data-driven, community-informed approach, with a focus on equity, to understand the current state of housing needs, identify trends, and develop strategies which can address the need for more housing. Developed between 2019 and 2021, the HAP was a foundational piece to guide implementation of Comprehensive Plan policies and identify policies for future consideration to further encourage housing development to meet our housing goals and policies.

The Spokane HAP outlined four priorities, with strategies and potential actions to assist with the development of more housing for Spokane:

- A. **Increase housing supply, options, and affordability for all incomes.** This looks at strategies to support the availability of housing options and encourage the construction of both affordable and market-rate housing.
- B. **Preserve housing affordability and quality to help people thrive where they live.** This priority highlights the connections between housing affordability and quality to preserve and enhance existing housing throughout Spokane and support residents in every neighborhood.
- C. **Enhance equitable access to housing and homeownership.** This priority seeks to understand and consider the historic context that have contributed to patterns of inequity and encourage the City to break down barriers to accessing housing.
- D. **Leverage and grow partnerships to support housing initiatives across the region.** This priority encourages local and regional partnerships to tackle the full scale of housing challenges faced by the community, and across the greater region.

Community engagement informed the priorities and strategies in the HAP. The City assembled a working group with community members representing housing developers, local realtors, nonprofit housing advocates, community groups, faith-based organizations, housing providers, City Boards and Commissions, and agency partners. The City worked with stakeholders and partners to discuss concerns, issues, and feedback on housing, and invited community input through several opportunities. Summaries of the engagement outcomes are available on the HAP City project webpage.

- A series of four roundtable discussions were held in the fall of 2020 discussing development regulations, land use and housing policy, equity in housing, and affordable housing and rental housing.
- The City also conducted a community survey on housing experiences and issues, receiving over 1,200 responses with language access in six languages: English, Arabic, Marshallese, Russian, Spanish, and Vietnamese.

⁸⁶ City of Spokane, 2021

- The City conducted a survey targeted at housing industry professionals, regarding housing development trends and gaps.

As a foundational document, the Spokane HAP provided important information, data, and community discussion into identifying housing needs, gaps, challenges, and opportunities. The following table outlines policies from the HAP that support expanding housing options, and implicitly or explicitly address racially disparate impacts and anti-displacement. More details of individual strategies and actions are included in the Spokane HAP.

Housing Action Plan Supportive Strategies

HAP Strategy	Action
<i>Strategy that is supportive of expanding housing options, RDI, and equity in housing.</i>	<i>Action that implicitly or explicitly addresses RDI and equity in housing.</i>
Goal A. Increase housing supply, options, and affordability for all incomes.	
A1. Explore and expand allowed housing types to encourage missing middle housing throughout Spokane's neighborhoods.	More housing types in currently zoned single-family residential areas
A1. Explore and expand allowed housing types to encourage missing middle housing throughout Spokane's neighborhoods.	Encourage increased density and housing types in all residential areas
A2. Target efforts to increase the development of affordable housing throughout the City to support mixed-income neighborhoods.	Examine incentives for affordable housing, including fee waivers for development of income-restricted units, while also exploring policies to mitigate displacement.
A2. Target efforts to increase the development of affordable housing throughout the City to support mixed-income neighborhoods.	Target efforts to create and preserve dedicated affordable housing in areas with greater services and amenities and expand efforts in lower income neighborhoods to grow economic opportunity.
A2. Target efforts to increase the development of affordable housing throughout the City to support mixed-income neighborhoods.	Explore incentives for the inclusion of more affordable homes in new market-rate development, consistent with Comprehensive Plan Housing Policy H 1.8.
A2. Target efforts to increase the development of affordable housing throughout the City to support mixed-income neighborhoods.	Support efforts among local and regional partners to re-engage and grow a community land trust, including identifying ways to use the City's assets to support this effort.
A6. Leverage public and partner-owned land for housing, including a land bank.	Work with the community to create a land bank that facilitates redevelopment and supports the development and preservation of affordable housing.
A6. Leverage public and partner-owned land for housing, including a land bank.	Consider adaptive reuse and brownfield remediation, when suitable, for affordable housing.

A6. Leverage public and partner-owned land for housing, including a land bank.	Allow more flexibility for faith institutions to increase the number of affordable homes they can build on their property, pursuant to RCW 35A.63.300 and RCW 36.70A.545.
B. Preserve existing housing affordability and quality to help people thrive where they live.	
B1. Expand preventative and proactive code enforcement to help maintain safe and quality housing.	Improve resolution to “zombie” properties by prioritizing receivership instead of demolition.
B1. Expand preventative and proactive code enforcement to help maintain safe and quality housing.	Expand the current model of residential foreclosure property monitoring to include monitoring of other situations that tend to result in concentration of code violations, such as vacancy.
B1. Expand preventative and proactive code enforcement to help maintain safe and quality housing.	Continue to support the City’s code enforcement efforts and initiatives aimed at preserving safe and quality housing, including the continued development of a proactive and preventative-based approach to code enforcement, as called for in Comprehensive Plan policy H 2.2.
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.	Streamline navigation for community members and City processes to support improved access to housing and community development programs, including providing housing program materials in more languages, increase the frequency of announcements, and improve websites and other materials.
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.	Highlight and grow City and partner programs that support affordable homeownership, including single-family rehab programs, essential home repair programs, derelict housing programs, and similar programs offered by partner organizations.
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.	Expand resources to mitigate and reverse the effects of environmental hazards, past and present, and promote the health and safety of existing housing, including remediation of existing lead and asbestos in some homes.
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.	Explore a local housing trust fund as an ongoing source of dedicated funding to support housing affordability and meet the most critical housing needs.
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.	Consider forgiveness of City-controlled liens (i.e. rehab liens) for derelict properties under certain affordable housing criteria.
B2. Align and leverage programs, funding, and resources to preserve the quality and livability of existing affordable housing.	Consider developing criteria for forgiveness of City-controlled liens in order to facilitate redevelopment of derelict properties for affordable housing.

B3. Enhance protections and assistance for renters, particularly the most vulnerable.	Work with community members and tenant advocates to address ongoing barriers to accessing rental housing.
B3. Enhance protections and assistance for renters, particularly the most vulnerable.	Continue community discussions around a set of tenant protections policies.
B3. Enhance protections and assistance for renters, particularly the most vulnerable.	Monitor the efficacy of recently adopted state laws aimed at mitigating tenant displacement, identifying opportunities and gaps where local strategies may be helpful.
B3. Enhance protections and assistance for renters, particularly the most vulnerable.	Identify ongoing sources of rental and utility assistance to promote housing stability post-COVID for low-income households.
B4. Maintain and improve existing affordable rental housing.	Continue to support the purchase of existing affordable housing by non-profit housing organizations and community-based organizations to preserve the housing stock and prevent displacement.
B4. Maintain and improve existing affordable rental housing.	Consider incentives to preserve affordable single-family rentals, to support the maintenance and utilities of homes, and encourage financially responsible involvement.
B5. Study the local short-term rental market to reduce impact on housing affordability, neighborhood identity, and displacement.	Study current short-term rental regulations, informed by local market data, and amend them to limit negative impacts where appropriate.
C. Enhance equitable access to housing and homeownership.	
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.	Expand information provided in Spanish, Russian, Marshallese, Vietnamese, Arabic, and other languages to help increase access to housing and community development programs and resources.
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.	Support land use and development code regulations that allow diverse housing types and support mixed-income communities, consistent with Comprehensive Plan Policy H 2.2.
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.	Prioritize investment and incentives that support housing affordability and stability for low-income residents and people of color in historically underserved neighborhoods, while also increasing access to high-resource neighborhoods.
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.	Support partner organizations' efforts to expand homeownership education, outreach, and assistance programming to reach more potential homebuyers, including expanding down payment assistance and financial counseling classes.

C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.	Support community-based organizations with a commitment to increasing Black, Indigenous, Latinx and People of Color homeownership and reducing the racial homeownership gap.
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.	Promote universal design in residential development to support all people regardless of their age, size, and ability in accessing housing to the greatest extent possible, without the need for adaptation or specialization.
C1. Reduce barriers and expand access to housing and homeownership for lower income households, first-time homebuyers, people of color, and people with disabilities.	Work with the community and partner organizations to explore shared equity models to provide home ownership opportunities to low- and moderate-income families, including limited-equity resident-owned communities, cooperatives, and deed restrictions.
C2. Address racial inequities and disparities in housing.	Develop a racial equity framework and expand analysis of equity indicators to inform housing and land use policy, code regulations, and to mitigate displacement.
C2. Address racial inequities and disparities in housing.	Conduct an equity review and update the Comprehensive Plan Housing Chapter if needed.
C2. Address racial inequities and disparities in housing.	Continue work to eliminate barriers identified in the City's Analysis to Impediments of Fair Housing, and affirmatively further fair housing practices in City government.
C2. Address racial inequities and disparities in housing.	Expand research and application of equity and anti-displacement practices to deepen place-based analysis and reflect in policy development.
C2. Address racial inequities and disparities in housing.	Work with community partners to encourage actions that address unfair/discriminatory housing, lending and appraisal practices and increase access to credit.
C2. Address racial inequities and disparities in housing.	Equitably engage and empower all community members to participate in shaping housing policies, particularly those most impacted including but not limited to people of color, people with disabilities, lower income households, renters, refugees, immigrants, women and LGBTQIA+ and other under-represented groups.
C2. Address racial inequities and disparities in housing.	Partner with local organizations to provide fair housing education for housing providers, and fair housing design and construction training for developers, contractors, architects, engineers, and city planning and development personnel.
C3. Preserve and stabilize the viability of existing homeownership for low-income homeowners.	Identify and allocate additional resources for the rehabilitation and maintain viable affordable housing that goes beyond regular upkeep.

C3. Preserve and stabilize the viability of existing homeownership for low-income homeowners.	Encourage proactive counseling and education for homeowners on maintenance and upkeep of their homes.
C3. Preserve and stabilize the viability of existing homeownership for low-income homeowners.	Support programs that reduce tax burdens to help homeowners with costs and stay in their neighborhoods, targeting but not limiting such programs to lower and moderate income, elderly, disabled, and veteran homeowners.
C3. Preserve and stabilize the viability of existing homeownership for low-income homeowners.	Investigate expanding City resources, programming, and partnerships to support home safety modification projects for lower income, disabled, and elderly homeowners.
D. Leverage and grow partnerships to support housing initiatives across the region.	
D2. Leverage partnerships within the health, education, parks, and transportation fields to support housing affordability, access to opportunity and quality of life.	Continue to explore connections and partnerships with school districts on housing, planning, and education outcomes to support greater access to opportunity for all students and families.
D2. Leverage partnerships within the health, education, parks, and transportation fields to support housing affordability, access to opportunity and quality of life.	Leverage partnerships with hospitals and health care institutions to address upstream causes of inequity, promote safe and healthy housing, and maximize positive health outcomes.
D3. Grow and expand use of both local and regional housing data and analysis.	Build partnerships to create a database or registry of affordable and accessible housing. Monitor expiring affordability.

8.2.1 Housing Action Plan Implementation

Following the adoption of the Spokane HAP, and in recognition of the growing housing crisis, the City of Spokane embarked on an ambitious effort to increase housing options and affordability through the reduction of barriers to housing development of all types.

Code changes were made in 2022 to permit accessory dwelling units and streamline and simplify the development permit process:

- **Housing Action Plan Code Changes Phase I.** On June 27, 2022 City Council passed changes to the development code to make Accessory Dwelling Unit (ADU) development more feasible by making development and design standards more flexible for ADUs; removing the Lot Size Transition requirement for subdivisions in the RA and RSF zones, and modifying the notification requirements for short subdivisions and reducing the application fees for preliminary and final short subdivisions.⁸⁷
- **Housing Action Plan Code Changes Phase II.** The Housing Action Plan directed the City to streamline and simplify the development permit process to remove obstacles to building

⁸⁷ <https://my.spokanecity.org/projects/shaping-spokane-housing/hap-phase-one/>

housing. Following recommendations from the Washington Legislature listed in RCW 36.70A.600, the City proposed changes to the permitting process for environmental reviews required under the State Environmental Policy Act (SEPA). Additionally, the City made updates to where and how short-term rentals are approved, recognizing how they impact the housing supply locally.⁸⁸

In 2022, the City adopted an interim zoning ordinance called *Building Opportunity and Choices for All*.⁸⁹ This was a pilot program focused on expanded zoning regulations to allow middle housing such as duplexes, triplexes, fourplexes, and townhomes, on any residentially zoned lot in the city and modified site standards to make their development more feasible.

After the interim ordinance, *Building Opportunity for Housing* developed lasting Comprehensive Plan and Municipal Code amendments that increase housing choice and diversity throughout the city in 2023.⁹⁰ The goal of this program was to increase housing choice and attainability in the city for all income levels and housing types, focusing most intensely on middle housing options (2-unit, 3-unit, and 4-unit developments).

Policy discussions focused heavily on the Land Use chapter of the Comprehensive Plan so that it was supportive of a diversity of housing types and affordability throughout the city, was more inclusive, and was flexible enough to meet the evolving needs of the community.⁹¹ The City heard from residents that language focused on protecting neighborhood character and emphasizing single-family as the housing type was exclusionary, with a past of racial discrimination, and competed with the interests of providing more housing options everywhere in the city

Key changes to the Comprehensive Plan in 2023 included:

- Changed biased and exclusionary language, including:
 - Removed single-family and two-family residential language to focus on intensity of residential uses
 - Removed language on protecting the character of single-family neighborhoods to instead promote the uniqueness of each neighborhood and diversity
 - Changed focus from compatible uses that can highlight sameness, to complementary which emphasizes an array of options and acknowledges how differences can be beneficial
- Added new language in policy descriptions that support housing choice and diversity
- Added value statement: “Ensuring equitable housing supply by encouraging diversity of housing choice, mitigating the effects of displacement on existing residents, and ensuring attainable and accessible housing for all members of the community”

⁸⁸ <https://my.spokanecity.org/projects/shaping-spokane-housing/hap-phase-two/>

⁸⁹ <https://my.spokanecity.org/housing/building-opportunity/>

⁹⁰ City of Spokane. (2023a). *Building Opportunity for Housing*.

<https://my.spokanecity.org/projects/shaping-spokane-housing/building-opportunity-for-housing/>

⁹¹ City of Spokane. (2023b). *Building Opportunity for Housing - 2023 Comprehensive Plan Amendment*.

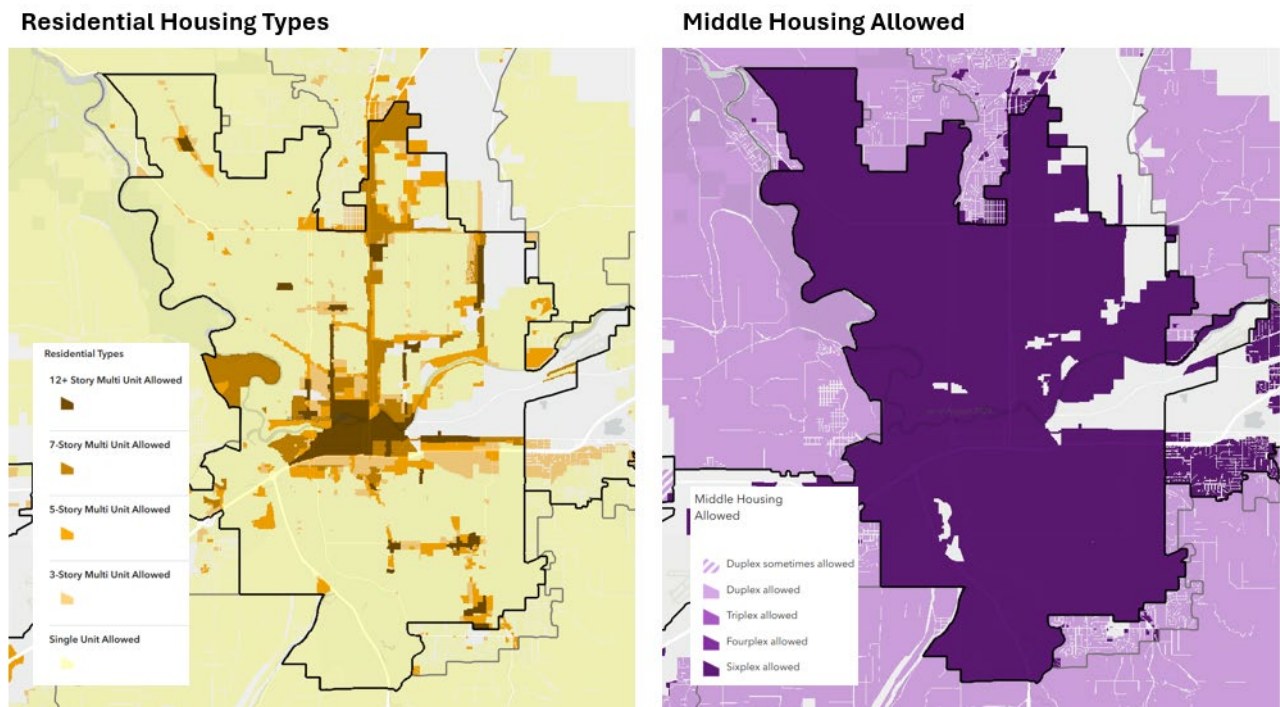
<https://my.spokanecity.org/projects/shaping-spokane-housing/building-opportunity-for-housing/2023-comprehensive-plan-amendment/>

These changes were incorporated into the Comprehensive Plan in 2023 and adopted by ordinance in the Spokane Municipal Code in 2024 with permanent development code changes that continued to reduce barriers to developing housing.⁹² Reduced lot size requirements and setbacks, increased height, and removal of parking minimums, along with no maximum density on infill lots provides the regulatory framework for developing even more residential units at a more affordable price. See **Figure 84 and Figure 85**

Key changes to the development code in 2024 included:

- Renamed "Residential Single-Family" to "R1" and "Residential Two-Family" to "R2"
- Matching design standards for single-unit detached homes and Middle Housing developments
- Added Multi-Unit Residential Building to list of permitted housing types in R1/R2 zones to allow Middle Housing types
- No parking required for residential uses within ½ mile of a transit stop, later reduced to no parking required for any use citywide
- No lot density maximums for lots less than 2 acres in size
- Reduced lot size minimums to 1,200 square feet across the majority of the city
- Expanded Unit Lot Subdivision process to allow for greater site flexibility
- Increased building height and reduced front and rear setbacks for some zones

Figure 84. Residential Zoning Uses Allowed

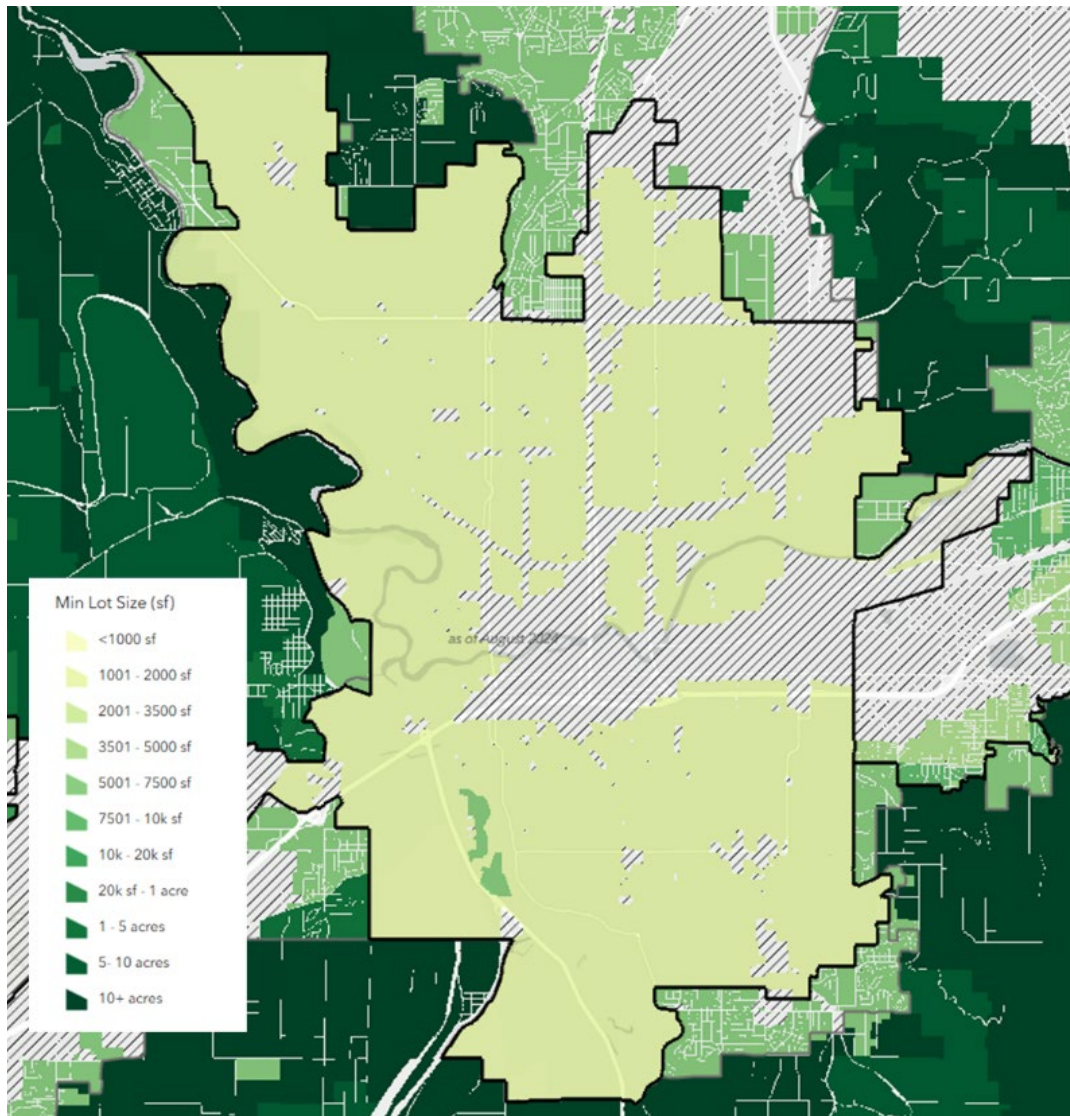


Source: Washington State Zoning Atlas, 2025.⁹³

⁹² City of Spokane, 2023b

⁹³ Washington State Department of Commerce. (2025). *Washington State Zoning Atlas (WAZA)*. <https://www.commerce.wa.gov/growth-management/data-research/waza/>

Figure 85. Minimum Lot Size Allowed



Source: Washington State Zoning Atlas, 2025.

8.3 Additional Considerations

8.3.1 Anti-Displacement Menu of Measures

The City of Spokane has identified a menu of anti-displacement measures in previous subarea planning projects, including in the South Logan Transit-Oriented Development (TOD) Plan⁹⁴ and the West Central Neighborhood Infrastructure Project that can be implemented to potentially mitigate the risks of displacement.⁹⁵ The following table includes anti-displacement measures for further consideration in the Housing Element:

Measure	Details	Target
Community Engagement	Engage early and often with neighborhood stakeholders to ensure all voices are heard.	Community
Rental Assistance Fund	A Rental Assistance Fund is a relatively low-cost way to minimize the impacts of displacement on the most economically vulnerable populations. The Fund could be capitalized through development-related fees or through government or grant subsidy. The Fund would be available to those residents needing relocation cost assistance or to cover security deposit requirements or moving expenses.	Community
Tenant Protections	Support residential anti-displacement strategies for tenants, including relocation assistance, rent stabilization, and 'right to return' policies that give highest preference for housing support due to displacement from new development.	Community, Residential
Community Preference Program	Consider a "community preference" policy which establishes preference for existing residents of the community in applications for affordable housing units to allow for disadvantaged residents of high displacement areas to access priority to new affordable housing units which could directly address displacement.	Community, Residential
Right-to Purchase Programs	Provides tenants and cities with the right to purchase government-assisted multifamily rental properties and mobile home parks when the owner decides to sell a property or exit an affordable housing program. This right is typically provided to qualified nonprofit organizations	Community, Residential

⁹⁴ Wharton, B., E. Kang, and L. Striar. Heartland LLC. (2023). *South Logan Strategies Memorandum – Housing & Anti-Displacement*. <https://static.spokanecity.org/documents/projects/south-logan-tod/south-logan-tod-final-housing-and-anti-displacement-memo-september-2023.pdf>

⁹⁵ City of Spokane. (2024c). *West Central Neighborhood Infrastructure Project*. <https://my.spokanecity.org/projects/west-central-infrastructure-project/>

	with the intent to keep current tenants housed and to prevent disruption of residence.	
Community Land Trusts	Land acquired by public agencies, nonprofits, or community-based organizations that maintain permanent ownership of land. Prospective homeowners are able to enter long-term (i.e., 99-year), renewable leases at an affordable rate. Upon selling, homeowners only earn a portion of the increased property value, while the trust keeps the remainder, thereby preserving affordability for future low- to moderate-income families.	Community, Residential
Housing Rehabilitation	Promote City programs that support affordable homeownership, including single-unit rehabilitation programs and essential home repair programs to help low- and moderate-income homeowners with home maintenance for health and safety.	Residential
Land Bank	Land banks can be used in service of other forms of public benefit, which might include in the creation of affordable housing and the development of properties which offer below-market commercial space, both of which contribute directly to anti-displacement goals.	Residential
Use of Development Agreements	A development agreement is a contract between a city and a property owner which summarizes responsibilities associated with redevelopment of land. Development agreements are highly customized and specific to a particular site to maximize public and private benefits. Development agreements can be a useful tool to document an agreement between the City and the property owner to guide development towards certain policy goals, including the creation of housing.	Residential
Minimum Density Requirements	Setting a right-sized minimum density to be structured as an incentive rather than as a requirement. If the density requirement is set at too high a level, development could be discouraged in the near- and medium-term, a counterproductive and unintended consequence. If the requirement is too low, opportunities to add density in strategic locations could be less than capacity.	Residential
Credit Support for Small-scale Developers	Lack of sufficient financial capacity is typically the primary barrier to financing of small projects and stands in the way of a citizen-developer corps who can do the hard but valuable work of locally-led, tactical, small-scale development.	Residential
Subsidy for Less Common Ownership Models	Land trusts, limited-equity cooperatives, and co-housing are relatively rare in the United States, but can be powerful models for long-term affordability and anti-displacement protection.	Residential
Middle Housing	Address housing choice and affordability, considering requirements for deeper affordability outcomes	Residential

Affordable Housing Density Bonus	In Spokane, projects with 25% or more units designated as “affordable” are granted expanded ground floors (building coverage) and additional floor area. Affordable housing bonuses can expand beyond these provisions to include bonus height, density, and waivers to typical costs such as off-site infrastructure impact fees.	Residential
Public Investments in Infrastructure to Support Development	Building housing along older commercial corridors can involve hidden risks and challenges. Chief among those risks is uncertainty and cost associated with older infrastructure like sewer, water, and electricity. Cities, regional governments, and states can play a role in accelerating housing production by making investments in aging sewer, water, and electric infrastructure at a neighborhood-wide scale to reduce financial barriers to housing development.	Residential
Low-Cost Rental Housing Preservation	Preventing displacement and preserving “naturally occurring” affordable housing through acquisition, low-interest loans/revolving loan fund for preservation, and/or code enforcement. Example: The Oregon Legislature committed \$15 million in lottery bonds to Oregon Housing and Community Services (OHCS) in 2019 to create a naturally occurring affordable housing loan fund modeled after the Greater Minnesota Housing Fund.	Residential
Public Development Authority (“PDA”)	PDAs play a critical role in addressing displacement pressures arising from rising housing costs and gentrification in urban environments. These authorities can implement a range of strategies to promote equitable development and prevent the displacement of vulnerable residents and businesses. Consider structuring PDAs to respond to community needs, like the example of Cultural Space Agency (CSA) in Seattle, which is a Public Development Authority that secures long-term affordable cultural space with community partners. Cultural spaces forestall cultural displacement by giving community members a place to assemble, organize, celebrate, and create a sense of connection. CSA partners with communities of color to create opportunities for ownership of commercial cultural space.	Commercial, Residential
Reduce or Eliminate Minimum Parking Requirements	Reduce or eliminate parking requirements, in exchange for a contribution in lieu which furthers the public benefit.	Residential, Commercial
Building Heights	Support increasing allowable building heights along transit corridors. Consider pairing with neighborhood Design Standards, especially in critical, high visibility areas.	Residential, Commercial
Commercial Anti-Displacement	Create and implement commercial anti-displacement strategies to keep and give preference to local, historic, and unique businesses in redevelopment.	Commercial

Flexibility for Ground Floor Retail Requirement	Flexible ground floor standards that permit but do not require retail, or require a smaller portion of the ground floor (e.g. corner space of buildings at intersections), would allow opportunities for retail to flourish in the right locations without also creating an impediment to new housing construction. Certain ground floor design or construction standards such as minimum floor heights can be employed to ensure flexibility to convert residential or “flex” space to convert to retail over time should demand for retail space increase in a particular location.	Commercial
Tax Increment Financing (“TIF”)	Tax Increment Financing (TIF) can be used for the “purchasing, rehabilitating, retrofitting for energy efficiency, and constructing housing for the purpose of creating or preserving long-term affordable housing,” RCW.39.114.	Commercial
Facilitate Public-Private Partnerships	Partner with institutional partners, like universities, to support business and economic development in strategic areas.	Commercial
Business Improvement District (“BID”)	BID could have as a guiding philosophy the support of new and preservation of existing local businesses, along with provision of funding programs, advisory services, and political advocacy.	Commercial
Affordable Commercial Tenanting	Provides public subsidy of commercial rents for qualified tenants in new construction. In Portland, OR, the City’s Affordable Commercial Tenanting Program addresses the displacement of small businesses from Portland’s urban neighborhoods. The program provides incentives to property owners in exchange for below-market rents for commercial tenants. Tenants must satisfy certain conditions including revenue thresholds, cultural contributions to the neighborhood.	Commercial
Small Developer Technical Assistance	Small loans (\$20,000-\$50,000) coupled with technical assistance to help local land owners and entrepreneurs build new development or renovate existing structures. Program features low-barrier underwriting, and very low or no interest.	Commercial
Storefront Improvement Program	Grants (typically <\$50,000) for small-scale revitalization projects such as rehabilitation of street-facing building facades including storefronts, cornices, gutters and downspouts, signs and graphics, exterior lighting, canopies and awnings, painting and masonry cleaning, and limited security and accessibility improvements.	Commercial
Small Business Alliance	Develop a business association focused on small or home-based businesses. Ensure this group is narrowly focused on issues impacting the neighborhood. Should be facilitated by City staff who can also provide technical assistance.	Commercial

Local Vendor Collective	Resources to support home-based and other businesses without brick-and-mortar space. In Vancouver, BC, the vendor's collective offers vending opportunities to low-income artists, craftspeople, and entrepreneurs with experience in the informal economy. Resources could include booths and/or table space, publicity and event organization, dedicated space for vending activities.	Commercial
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8.3.2 Spokane 2024 Fair Housing Plan

The Spokane 2024 Fair Housing Plan⁹⁶ also outlined several recommendations based on the fair housing analysis and community feedback. These are included here as further consideration for the Housing Element. More information and context are provided in the Fair Housing Plan.

Middle Housing Recommendations:

- Middle housing needs to be expanded to include an affordability requirement.
- Allow and incentivize mid-size development like 6-plexes, which can be harder to build cost-effectively than larger multi-family complexes.
- Anti-displacement measures should be developed with middle housing to minimize displacement that may occur if affordable housing is demolished to make way for new middle housing. Stakeholder concerns expressed include:
 - Affordable housing will be lost and replaced by higher rent units
 - Housing that typically has lower barrier background screening policies will be eliminated and replaced by developments that utilize more stringent screening criteria and check criminal history
 - Remodels, demolition, and building of ADUs will allow tenants to be terminated with no cause notice and displaced
- Consideration of policy for right of first return requirement for displaced tenants
- Open more zoning for larger multi-family housing, not just missing middle type

Mixed Use Housing

- Promotion of “Community Model” of housing to create mixed use and mixed income housing to allow for owners, renters, low- and high-income households, seniors, and families with children to interact with walkable neighborhood development and access to green space, public transit, grocery stores, playgrounds, gardens, and libraries.
- Barrier to developing housing in and near grocery and other commercial amenities is zoning laws which limit commercial development in residential-only neighborhoods.
- Land which the City may have available to develop may be under long-term contracts, during which time it may be difficult to change to mixed-use.
- “Social housing” was suggested by several interviewees and survey participants as a desirable mixed-income housing model, where everyone pays 30% of income, regardless of income.

⁹⁶ City of Spokane, 2024a

Siting of Affordable & Permanent Supportive Housing

- Much of Spokane's affordable housing and permanent supportive housing development has been concentrated downtown, in part due to zoning, available property to build, and central access to social services. Clustered housing can put people recovering from substance use disorder near those currently using and make it difficult to escape a cycle of relapse, a serious concern especially amidst the fentanyl epidemic.
- Need for increased scattered site affordable housing. Scattered site housing allows people more options for neighborhood access and deconcentrates people with low incomes from only living near each other. Scattered site housing also enables people to have different housing experiences besides large apartment building living, access different neighborhoods, and increase equity in school systems.

Tenant Protections

- Changes to tenant screening requirements
- Rental registry should move from voluntary to enforcement, and require inspection before renting, not just cause-based inspections of residential rental property.
- Need for ongoing rental assistance

Racial Equity

- BIPOC people need to be included in City and Regional Boards and Commissions.
- Racial equity analysis to examine policies, programs, and practices to identify racial disparities and uncover systemic biases, and then use race-neutral metrics, such as poverty rates and percentages of area median income, to design equitable programs.
- Expand interpreting and translation services
- Providing rental applications in other languages

8.4 Policy Summary

The policy evaluation analyzed the 29 housing policies currently in the Shaping Spokane Comprehensive Plan, as of August 2025. Based on the evaluation, the Housing Element has a range of policies that are supportive of or approaching addressing housing needs and housing opportunities, with few that are considered challenging. The policy evaluation outcomes include:

- 10 supportive policies
- 16 approaching policies
- 2 challenging policies
- 1 policy found not applicable to the evaluation questions

A summary of the policy analysis outcomes per current Housing policy (as of August 2025) is:

Housing Element Policy	Supportive	Approaching	Challenging	NA
H 1.1 Regional Coordination				
H 1.2 Regional Fair Share Housing				
H 1.3 Housing Employer-Sponsored				
H 1.4 Use of Existing Infrastructure				
H 1.5 Housing Information				
H 1.6 Fair Housing				
H 1.7 Socioeconomic Integration				
H 1.8 Affordable Housing Requirement				
H 1.9 Mixed-Income Housing				
H 1.10 Lower-Income Housing Development Incentives				
H 1.11 Access to Transportation				
H 1.12 Affordable Housing Funding Sources				
H 1.13 Siting of Subsidized Low-Income Housing				
H 1.14 Building, Fire, Infrastructure, and Land Use Standards				
H 1.15 Performance Standards				
H 1.16 New Manufactured Housing				
H 1.17 Partnerships to Increase Housing Opportunities				
H 1.18 Distribution of Housing Options				
H 1.19 Senior Housing				
H 1.20 Accessory Dwelling Units				
H 1.21 Development of Single-Room Occupancy Housing				
H 1.22 Special Needs Housing				
H 1.23 Distribution of Special Needs				
H 1.24 Taxes and Tax Structure				
H 2.1 Housing Rehabilitation				
H 2.2 Property Responsibility and Maintenance				
H 2.3 Housing Preservation				
H 2.4 Linking Housing With Other Uses				
H 2.5 Housing Goal Monitoring				

Substantial progress has been made in addressing policies that have a discriminatory effect through the previous land use and code changes. Additional work can still be done to address the impacts and implement policies and regulations to strengthen the City's ongoing focus on equity in housing, including:

- Editing language to strengthen and clarify existing policies.
- Incorporating the recommendations of the Housing Action Plan, anti-displacement studies, and the Fair Housing Plan.
- Identifying new policies that are needed to better address existing racially disparate impacts, displacement, and exclusion in housing.
- Identifying new policies to prevent future displacement.
- Considering how policies overlap in the Comprehensive Plan to fully address racially disparate impacts, displacement, displacement risk, or exclusion in housing.

With adjustments in the following areas, many policies in the Comprehensive Plan can be adapted to be more supportive:

Anti-Displacement

- Directly address displacement risk by incorporating language, framing, and measures that promote a stronger focus on anti-displacement. This includes adding explicit anti-displacement language to policies encouraging development in well-served or high-cost areas.
- Prioritize supporting residential anti-displacement strategies for tenants, including relocation assistance, rent stabilization, and 'right to return' policies
- Incorporate anti-displacement in transit and commute policies by amending policies that promote infill and transit-oriented development to preserve existing residents, especially in historically marginalized neighborhoods.
- Balance investment with displacement risk in areas that are targeted for housing growth, job growth, and investment over the next 20 years. Ensure that policies do not protect high-income, White neighborhoods from change while pushing new development and growth into historically marginalized areas.
- Explore displacement impact analysis in infrastructure projects and public investments, land use and zoning decisions, housing programs, and use of public funds.
- Create commercial anti-displacement strategies to keep and give preference to local, historic, and unique businesses in redevelopment.

Moderate-Income Housing

- Focus on moderate-income housing (80-120% AMI) to avoid gaps in housing opportunity for households who don't qualify for subsidies, but can't afford market-rate housing.
- Support the preservation and expansion of pathways to homeownership for those who have historically been excluded, including opportunities for single-unit homeownership. This includes a focus on preserving affordable housing and homeownership pathways in historically underinvested areas that have identified housing capacity and may be targeted for housing growth.
- Incentivize midsize residential development to support housing options for lower income households.

Affordable Housing

- Consider an affordability requirement in middle housing to ensure housing development is supporting all income levels.
- Prioritize mixed-income housing to reduce exclusion and avoid concentration of poverty.
- Pair transit investment with housing affordability protections.
- Prioritize low-income and historically marginalized groups, in addition to supporting housing opportunities for all, to ensure outcomes are targeted to equitably distribute benefits, and overcome socioeconomic isolation and loss of community wealth building.
- Incorporate policy tools like rent stabilization, repair/rehab support, tax relief, community preference, and tenant protections to prevent displacement.

Code Enforcement

- Prioritize supportive and proactive approaches and integrate current practices like rental registries and education.

Community Ownership Model

- Promote community-owned homeownership and equity models, including community land trusts, cooperative housing, and resident ownership models.
- Promote mobile home preservation and updated manufactured home standards that allow for a greater amount of diversity in type, construction, and location.

Accessibility and Disability Inclusion

- Remove and update harmful/stigmatizing language.
- Encourage accessible homeownership in addition to accessible rentals.
- Promote inclusive housing design, independent living, and affordable accessible housing.
- Avoid policy outcomes that concentrate housing in isolated areas based on affordable housing types or zoning.

Funding and Partnerships

- Consider expanding funding opportunities and incentives, usually going to developers and housing providers, to include funding or incentives that support and benefit residents directly, like rental assistance.
- Support BIPOC-led development, partnerships with BIPOC organizations, and workforce development and training in the development, construction, real estate, finance, and other private sectors.

Access to Information and Education

- Expand housing information and education to include language access equity.
- Support partnerships with BIPOC organizations to expand culturally relevant homeownership education and outreach.
- Include lived experience in design and programming around housing information to ensure informed and relevant outreach.

Strengthen Accountability

- Reference fair housing as a requirement in the policy language.
- Identify key indicators for monitoring housing and racially disparate impacts that can be included in reporting for accountability and transparency, with community involvement.

8.5 Next Steps

The City of Spokane has taken steps to begin to undo the impacts of racially disparate impacts in housing, a legacy of historic policies and practices that continue to impact residents' ability to access housing and opportunities today. Building on the work the City has already completed, the policy evaluation sets the stage for a strengthened focus on housing equity and accessibility over the next 20 years.

The policy recommendations within this report will be implemented through the PlanSpokane 2046 Periodic Update to the comprehensive plan, in which existing policies will be revised and new policies will be added to better meet the needs of the community and begin to undo the harms of racially disparate impacts and displacement risk. The comprehensive plan lays the foundation for priorities for the City and guides the regulations, plans, funding, and incentives.

In addition to the policies within the comprehensive plan, there are likely both supportive and conflicting regulations within the Spokane Municipal code as well. Once the housing policies within the comprehensive plan have been updated, implementation of these policy priorities will occur through updates to regulations in the Spokane Municipal Code, incentive programs, funding priorities, and additional plans. Updates to these regulations and the establishment of programs to implement the policy priorities will come as part of the adoption of PlanSpokane 2046 in late 2026.

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