Auzins, Erin

From: Clerk, King County Council

Sent: Monday, December 5, 2022 1:29 PM **To:** KCC - All Members (Email Group)

Cc: Clerk, King County Council

Subject: FW: COMMENT

Good afternoon Councilmembers,

The following email was received in the Clerk's Inbox.

Thank you,
Gavin Muller (he/him)
Legislative Clerk - Metropolitan King County Council
516 Third Ave, Room 1200 | Seattle, WA 98104
(206) 263-3138 | gavin.muller@kingcounty.gov

From: Elizabeth Studer <emstuder@icloud.com> Sent: Monday, December 5, 2022 5:04 AM

To: Clerk, King County Council <Clerk@kingcounty.gov>

Subject: COMMENT

To whom it may concern,

I am writing to express my concern and opposition to the rezoning of my neighborhood to "Urban-High Density. I cannot attend the hearing in person but may be able to log in to the Zoom call.

It is important to me, that my voice is heard in this matter, so in case I am unable to call in, I wanted to submit my comments.

I recently purchased my home in the Glendale / Boulevard Park area. I was born and raised in Seattle, and my extended family including my great-grandmother have all lived in Boulevard Park at one time or another. One of my first jobs as a teenager was in this area.

When looking for a home to purchase, I looked at 12 houses in one day. There were many great homes in all kinds of neighborhoods. When I turned to come into this neighborhood, I saw a woman walking her baby in a stroller, and she waved to me. I immediately thought, this is a good neighborhood. I immediately sensed that this was a close-knit neighborhood that was well established.

I have purchased a few homes in other states, and no matter how much I love a house, it ultimately comes down to a question I ask myself, "would you sleep here alone tonight?" The answer for me was clear with only one house. The home I purchased in this neighborhood that is up for re-zoning, was the only neighborhood I felt safe in.

The day of my inspection, my mother was at my house because I was at work. She called me to tell me how wonderful my neighbors were. I feel honored to be a part of this neighborhood. There is an established sense of community and pride in our homes that comes from ownership. Within the first month of being here, I have met more of my neighbors and experienced the connectivity of this community. I trust my neighbors. I know them. We look out for each other. When I am out in my yard and someone walks by, they always say hello, but most of the time they also stop by and chat.

My concerns with over-crowding and increased traffic, along with transient residents who are renting will make me feel less safe. I do not want this special place to become a thru-way to a larger rental community. I bought this home to feel safe, and to live in this very special neighborhood that has been a part of my family for years.

Please do not approve this re-zoning. I truly believe it will ruin this very special place that my neighbors and I call home, and that so many of my family members have called home before me.

Thank you for your consideration and for hearing my concerns. I truly appreciate your time, and your willingness to hear from our community.

Sincerely, Elizabeth Studer 10444 16th Ave. S. Seattle, WA 98168

Auzins, Erin

From: Tracy, Jake

Sent: Monday, December 5, 2022 4:55 PM

To: Auzins, Erin; Ngo, Jenny

Subject: FW: 2022-0162 - Equity Requires Revision of the North Highline Subarea Plan

Attachments: NH SAP Comments to KCC 12-5-22.docx

Jake Tracy

Principal Legislative Analyst King County Council 206-263-0875

From: Camp, Cherie < Cherie. Camp@kingcounty.gov > On Behalf Of Clerk, King County Council

Sent: Monday, December 5, 2022 4:49 PM

To: KCC - All Members (Email Group) < ZZCNCMEMBERS@kingcounty.gov>

Cc: Clerk, King County Council <Clerk@kingcounty.gov>; Tracy, Jake <JTracy@kingcounty.gov>

Subject: FW: 2022-0162 - Equity Requires Revision of the North Highline Subarea Plan

Good Afternoon Councilmembers,

The following email and attachment were received in the Clerk's Inbox.

Thank you,

Chérie Camp

Legislative Clerk –

Clerk of the Council's Office –

Metropolitan King County Council

516 Third Ave, Room 1200 | Seattle, WA 98104 206-263-3639 | cherie.camp@kingcounty.gov

From: liz giba@comcast.net < liz giba@comcast.net >

Sent: Monday, December 5, 2022 4:44 PM

To: Clerk, King County Council < Clerk@kingcounty.gov>

Cc: McDermott, Joe <<u>Joe.McDermott@kingcounty.gov</u>>; Dembowski, Rod <<u>Rod.Dembowski@kingcounty.gov</u>>; Zahilay,

Girmay <Girmay.Zahilay@kingcounty.gov>; Perry, Sarah <Sarah.Perry@kingcounty.gov>; Kohl-Welles, Jeanne

<Jeanne.Kohl-Welles@kingcounty.gov>; %20Dave.Upthegrove@kingcounty.gov; Balducci, Claudia

<<u>Claudia.Balducci@kingcounty.gov</u>>; %20Pete.vonReichbauer@kingcounty.gov; Dunn, Reagan

<Reagan.Dunn@kingcounty.gov>

Subject: 2022-0162 - Equity Requires Revision of the North Highline Subarea Plan

Please forward the attached Comments on 2022-0162 to Councilmembers for Tuesday's meeting. Thank you. -Liz Giba

Please Reject the Proposed North Highline Subarea Plan

Comments of Liz Giba to King County Council – 11.21.22

In 1973, I moved from Chicago, a beautiful city with segregated poor "bad" neighborhoods, to White Center (WC), home to the King County Housing Authority's largest housing project (Park Lake I & II). Today, WC is also the largest neighborhood in the 3.7ish square mile unincorporated area of North Highline (NH). To many, NH is WC.

I've witnessed almost 50 years of NH/WC history. Most notably, the removal of countless trees to make room for a heavily urbanized, infrastructure poor community with over 2,300 bedrooms in nearly 1,300 units of tax-exempt housing. Many of those units are home to large, often poor immigrant families.

I grew up in a poor immigrant family. My Polish father came to America after fighting the Nazis, settling in Great Britain, and meeting my mother after the war. They settled in the Southside of Chicago. When I was 4, we moved to a mostly Polish and Italian community right outside the Chicago border.

I followed in my parents' footsteps and moved to WC with my boyfriend when I was 21. We had \$2000 to make the trip and get established. We rented an old house across from WC Park for \$95 a month from a lady who worked in the Satterberg WC law office. (WC Park is now Steve Cox Memorial after White Center's Superman" Slain deputy had become White Center's "Superman" | The Seattle Times)

Some of WC's more recent history is described on Pages 154 and 155 of Attachment C to the 2022 Update to 2016 Comprehensive Plan. I am not associated with the WC Community Development Association (WCCDA. However, history leads me to agree with their concerns and believe their comments outline some of the reasons to reject the proposed NH Subarea Plan.

In April of 2021, the WCCDA contracted with King County. In the \$100,000 contract the WCCDA agreed to do community outreach; provide feedback to the County; and make suggestions. After the outreach for the Public Review Draft - the WCCDA's comments included (emphasis added):

"...We have found the County's methods....not responsive and needs to be more adaptive to the community's challenges and solutions. There was no real process to keep the County accountable to their equity and social justice values...."

"Instead of owning its accountability, the County cultivated a relationship that was inherently more transactional and passed on community's concerns about process and content to Council's timeline and decision making power, leaving community's concerns unaddressed, with little to no room for collaboration and inclusivity. The shared values are not evident throughout the subarea planning process..."

"County staff did make a few changes...the changes left much to be desired in creating equity and inclusion within this work."

"We conclude that we are experiencing an inequitable planning process needing reassessment. Resident's [sic] and business owners' overall ability to understand subarea planning materials have not been supported, given the lack of time, understandable tools and limited processes. In addition, the ongoing personal challenges of the pandemic, and rash of fires that occurred within the White Center business core has impacted the communities [sic] ability to engage quickly. The process has resulted in skewed data, limited engagement lacking depth and substance...."

Perhaps you think the WCCDA is being too subjective in its assessment of King County's approach to decisions that will continue to shape the resource and infrastructure poor community of NH/WC for decades. If I am reading Pages 148 – 154 of the NH Proposed Subarea Plan (Att. 3) correctly, the WCCDA had only **113 contacts** with community members. As surprising as that was, they only **2 months** (from October 4th - December 4th of 2021)?

The process should be amended in a variety of ways including to comply with laws and ordinances such as HUD's Affirmatively Furthering Fair Housing regulations. Affirmatively Furthering Fair Housing - HUD Exchange

Thank you for your time and willingness to acknowledge that this is a new process and needs to be improved before enacted.

Please Reject the Proposed North Highline Subarea Plan

Liz Giba

Liz giba@comcast.net

Councilmembers,

The proposed North Highline Subarea Plan requires substantial revision before it meets the requirements of the Fair Housing Act. Please stand up for equity and opportunity for all by sending the proposal back to the drawing board on December 6th.

-Liz Giba

Liz Giba's Comments on King County's Proposed

North Highline Subarea Plan & Inclusionary Housing Plans

12-5-22

On June 10, 2021 "U.S. Department of Housing and Urban Development (HUD) Secretary Marcia L. Fudge announced that HUD <u>published</u> an interim final rule ... to restore the implementation of the Fair Housing Act's Affirmatively Furthering Fair Housing (AFFH) requirement. <u>Federal Register</u> :: Restoring Affirmatively <u>Furthering Fair Housing Definitions and Certifications</u> The publication provides a robust definition of the duty to affirmatively further fair housing, to which many HUD grantees must certify compliance. Additionally, HUD is committed to providing communities that receive HUD funding with the technical support they need to meet their long-standing fair housing obligations....

In addition to barring housing discrimination, the Fair Housing Act requires HUD and its funding recipients, such as local communities, to also take affirmative steps to remedy fair housing issues such as racially segregated neighborhoods, lack of housing choice, and unequal access to housing-related opportunities. To fulfill this requirement, in 2015, HUD promulgated a rule that compelled each covered funding recipient to undertake a defined fair housing planning process. Funding recipients were required to complete an assessment of fair housing issues, identify fair housing priorities and goals, and then commit to meaningful actions to meet those goals and remedy identified issues, with HUD reviewing each assessment. The last administration suspended implementation of this rule and eliminated the 2015 rule's procedural requirements, redefining the regulatory AFFH requirement so it was no longer consistent with the actual requirements of the Fair Housing Act....The interim final rule will go into effect on July 31, 2021.

King County's Subarea Plan for North Highline and associated inclusionary zoning proposals will sabotage King County's intention of meeting King County's duty to Affirmatively Further Fair Housing (AFFH) and start transforming segregated King County into a healthy, vibrant, and diverse county of opportunity rich communities. As drafted, King County's proposals ignore "opportunities that address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws." (AFFH FACT SHEET, HUD)

<u>HUD Restores Affirmatively Furthering Fair Housing Requirement | HUD.gov / U.S. Department of Housing and Urban Development (HUD)</u>

The Alliance for Housing Justice supports the AFFH including:

"AFFH:

Equips local communities for decision making by providing local officials with data and mapping and other analytical tools. This data equips HUD grantees to better analyze patterns, trends, and conditions. Grantees are encouraged to gather additional local data and knowledge to ensure that the full local context and conditions inform the analysis."

Understanding AFFH: What It Is and How Does It Work? (allianceforhousingjustice.org)

Why is KC proposing a plan that will mold the future of this neighborhood without facts? Facts matter!

Remember this? King County Equity & Social Justice Initiative (E&SJ)

Working toward fairness and opportunity for all

What if all residents of King County had the same opportunities regardless of race, ethnicity, gender, immigration status, sexual orientation or disability?

What if all residents of King County had the opportunity to receive the same quality education, the same access to basic health care, the same opportunities to work for a living wage, the same access to affordable housing, the same ability to live in safe neighborhoods, and the same opportunity to enjoy the natural environment?

A new, better and very different King County would emerge. We can be the catalyst for this change.

-King County Executive Ron Sims (2008)

The people of North Highline deserve a fair chance at long, healthy, and opportunity-filled lives. The Subarea Plan and associated zoning proposals would not lead to equity. Equitable planning decisions require facts.

Data-based decision making resulted in the 2010 study **The Geography of Opportunity Mapping to Promote Equitable Community Development and Fair Housing in King County, WA** by the Kirwan Institute which reported:

"The goal of the opportunity mapping initiative is to explore how low-income groups and racial and ethnic populations are situated within King County's geography of opportunity....

Essential opportunities needed to succeed, thrive and excel in our 21st-century society include high quality education, a healthy and safe environment, sustainable employment, political empowerment and outlets for wealth building. By assuring access to these critical opportunity structures the likelihood that people can meet their full development potential benefiting both the individual and society as a whole increases dramatically. Unfortunately, access to these critical building blocks of opportunity is not equal, or even possible, for many people. This isolation from opportunity is even more pronounced in low-income communities, especially communities of color. Many low-income communities are deprived of the essential elements needed to advance and succeed in our society....

Due to the critical importance of affordable housing in providing access to opportunity, the King County opportunity mapping initiative analyzed the supply of subsidized housing in the County in relation to opportunity. **The results suggest that the County's subsidized housing supply is**

isolated from many high opportunity communities. Nearly 62% of the subsidized housing sites in the County were found in low opportunity communities....

Racialized isolation from neighborhoods of opportunity is highly evident in King County." (Emphasis added.)

In August of 2011, the Kirwan Institute released the **Opportunity & Mapping Analysis for White Center.** The Kirwan Institute were explained as:

"The Kirwan Institute for the Study of Race and Ethnicity at the Ohio State University partners with people, communities, and institutions worldwide to think about, talk about, and engage issues of race and ethnicity in ways that create and expand opportunity for all. We envision a society and world that is fair and just for all people, where opportunity is not limited by race, ethnicity, gender, or class, where democratic ideals inform social policy, and where all people recognize and embrace the universal responsibility that each person has for the welfare of every other person."

The Opportunity Analysis included many important facts about life in White Center, lack of opportunity in White Center, segregation in King County and how housing was a significant tool in achieving segregation. Now, a decade later, it also raises some important questions:

1) The Impacts of Life in Poor, Segregated Neighborhoods Are Well-Documented.

Why doesn't the Subarea Plan Discuss Them?

Excerpts from Opportunity Analysis:

- In 1968, the Kerner Commission Report, in response to the 1960s urban uprisings, noted that "the single overriding cause of rioting in the cities was not any one thing commonly adduced unemployment, lack of education, poverty, exploitation it was all of those things and more...."4 (p. 14)
- The description of the **systematic and structural challenges facing distressed communities** was repeated nearly 40 years later in a study of concentrated poverty released by the U.S. Federal Reserve and The Brookings Institution. The report authors noted that "[e]ach of the headline issues examined in this chapter schools and skills, housing, lack of mainstream investment, and limited community capacity— plays a role in **perpetuating the disadvantage confronting these high-poverty urban... areas** today." (p. 14)
- The **quality of neighborhood** conditions affects the life chances of **all** families and their access to social, political, and economic resources. (p. 14)
- Children growing up in very poor families with low social status can also experience **unhealthy levels of stress hormones**, which impair neural development.10 (p. 14)
- The impact of health status on school achievement is so important that an estimated **25% of the** "achievement gap" in education is attributable to difference in child and maternal health.11 (p. 14)
- New studies are showing that **living in a severely disadvantaged neighborhood is equivalent to** missing an entire year of school.12 (p. 14)
- High percentages of students eligible for free and reduced lunch suggest that children are experiencing hardship beyond the school walls. **School poverty has serious implications** not just for students, but for

districts, communities, and the region. **Research has consistently found** that there is a negative effect of high poverty concentrations in school on students' academic achievement.1 (p. 8)

- Researchers commonly refer to a "tipping point," that point at which a school crosses a threshold and the **challenges associated with poverty in the school spirals beyond the control of the school.** Most experts place that point at 50%. At this point, **all** students' prospects are depressed. (p. 8)
- As one study has found, **high poverty schools** have to devote far more time and resources to family and health crises, security, children who come to school not speaking standard English, seriously disturbed children, children with no educational materials in their homes, and many children with very weak educational preparation.2 (p. 8)
- We also know that **school poverty negatively impacts** educational outcomes for **every** student within that school, regardless of individual promise and whether an individual student is poor or not.13 (p. 14 & 15)

2) Health Inequities in WC Are Serious and Life-Threatening.

How Would the Subarea Plan and Inclusionary Zoning Proposals Rectify These Inequities?

Excerpts from Opportunity Analysis:

- White Center/Boulevard Park had some of the **worst health outcomes in King County** in 2009, ranking number one for diabetes-related deaths, infant mortality, and heart disease. (p. 7)
- White Center youth engage in high-risk behaviors in greater numbers than King County youth overall. In a 2002 survey of 10th grade White Center youth, the youth reported higher levels of alcohol consumption, more favorable attitudes towards drugs, lower commitment to school, and less opportunity for positive social involvement in their communities, schools, and families than other students in King County. (p. 8)
- [I]n 2008, White Center still **ranked number two** in King County in **alcohol-induced deaths**, **homicide rates**, **and firearm-related deaths**. In 2009, roughly a third of households were **highly suspicious of neighbors** and only about half gave the neighborhood a high safety score. (p. 10)

3) Educational Inequities in WC Are Serious and Life-Limiting.

<u>How Would the Subarea Plan and Inclusionary Zoning Proposals Give the Children of WC a Fair Chance?</u>

Excerpts from Opportunity Analysis:

- In the 2009-2010 school year, **82.2% of the students in White Center** promise neighborhood area qualified for free and reduced lunch; a rate much higher than the **state average of 40.4%.** (p. 8)
- White Center students continue to perform at a **lower level** than King County students overall. In the 2009-2010 school year, only a little over half of elementary school and middle school students met the state reading test standard and even less met the math test standard; only 29.6% of White Center Heights Elementary School students met the math standard. (p. 8)
- English Language Learners did **significantly worse** on both standards: less than 20% met the reading standard and between 8 and 14% (depending on which school attended) met the math standard. (p. 8)
- Student poverty and proficiency scores in math and reading were troubling; the **only education** indicator with a positive score was the student/teacher ratio. (p. 17)

- An important contributing factor to the poor academic achievement indicators is poverty. In the 2009-2010 school year, **82.2**% of the students in the zone area qualified for free and reduced lunch, representing the highest concentration of such White Center Promise Neighborhood students within the school district; a rate much higher than the **60.3**% for the Highline School District or the state average of **40.4**%. (p. 8)
- Another report finds that once the concentration of **poverty in a district reaches 60%** or above, the district can no longer rely on its own internal efforts to improve outcomes.3 (p. 9)
 - 4) <u>Lack of Parks & Greenspace in WC Limit Physical Activity, Impair Health and</u>
 <u>Limit Space for Urban Species.</u>

Why Are the Subarea Plan and Inclusionary Zoning Proposals Attempting to Increase Density Without Planning for More Parks, Greenspaces and Trees?

Excerpts from Opportunity Analysis:

- Within White Center there are 5 parks, comprising just **2.8%** of the total land area compared with **10.2**% in Seattle proper.17 (p, 45)
- In 2007, an analysis conducted by the University of Washington (UW) found two areas of White Center that are **under-served by parks** and suggested that White Center should improve access to existing parks, improve connectivity between parks, and seek vacant lots within these two areas to create parks. (p. 13)
- The University of Washington's analysis also noted that White Center's habitat zones were largely a patchwork of unlinked sanctuaries, leaving little space for urban species to thrive. Habitats have been improved in the White Center green way, including efforts to ensure that native plant species can thrive. Despite these improvements, work remains to be done; the renovated parks are not part of the under-served areas, the connectivity of parks and the lack of accessibility continue to be a problem, and wetlands and other habitat zones in White Center require attention. (p. 13)
 - 5) Poverty, Economic Segregation and Inequity Are Associated with the Lack of Opportunity in WC.

 How Will the Subarea Plan and Inclusionary Zoning Proposals

 Increase Poverty, Segregation, Density, and Inequity Increase Opportunity in WC?

Excerpts from Opportunity Analysis:

- As stated in the findings of the bipartisan Congressional Millennial Housing Commission in 2002, "Neighborhood quality plays an important role in positive outcomes for families. Stable housing in an unstable neighborhood does not necessarily allow for positive employment and child education outcomes." This is just one example of how neighborhoods and their lack of opportunity can impact people's life chances. 15 (p. 15)
- **[D]ecades of social science** research have demonstrated that neighborhood conditions and access to opportunity play a significant role in quality of life and self-advancement. **(p. 15)**
- **[C]ompared to Seattle**, White Center has become a welcoming gateway for immigrants and refugees, who arrive, settle, raise families, establish businesses and build social, cultural and religious institutions. However, White Center has also experienced many difficulties, including **high poverty and crime**, **disinvestment**, and **low academic achievement**. (p. 5)

- White Center is a neighborhood of low opportunity. Ninety-two percent of White Center's population resides in very low opportunity census tracts compared to 20% of King County's population overall... (p. 17)
- The neighborhood poverty rate for White Center was **18%** compared to **10%** for King County, the average housing price only increased **6.6%** in White Center compared to **10.8%** in King County from 2005 to 2010... (p. 17)
- Not only does White Center consist of low and very low opportunity areas, but it is surrounded by very low to moderate opportunity areas on every side. **This leaves White Center residents with few opportunities to access opportunity even in nearby communities.** Furthermore, some areas within and next to White Center experienced a decrease in opportunity from 2009 to 2011.... (p. 17)
- All racial groups in White Center experience low to very low access to opportunity (p. 22)
- King County's racial inequity is mirrored in White Center, a racially diverse community of low and very low opportunity. (p. 22)
- The **poverty rate** in White Center is almost **twice** that of **King County** (p. 26)
- The household data suggests a close relationship between low-income and low opportunity (p. 26)
- ...opportunity in King County correlates to higher income communities a reality that affects White Center, which has almost double the poverty rate of King County overall. (p. 26)
 - 6) <u>Subsidized Housing Is Associated with the Lack of Opportunity in WC.</u>

How will Increasing Subsidized Housing Make WC a Healthier, More Equitable Community?

Excerpts from Opportunity Analysis:

- Over half of the subsidized housing in King County is located in areas of low opportunity, including White Center (p. 32)
- White Center and many other low opportunity areas have a significant amount of subsidized housing and housing vouchers. (p. 32)

King County has not been tracking equity or social justice in White Center/North Highline although its need was acknowledged in King County's Equity & Social Justice Initiative:

"A key ingredient of solutions is the need for intentional and systematic focus on inequities, including spending resources on measuring inequities. As noted earlier in this report, the facts alone are disturbing and compelling. However, to prevent equity and social justice from returning to the back burner when the next crisis erupts, these issues and trends should be tracked and reported regularly so that this region can assess its progress." (KC E&SJ Initiative, pg. 10)

Since 2018, King County has ignored this petition asking for a Fair Housing Assessment and Opportunity Analysis of North Highline.

"TO: King County Executive Dow Constantine and King County Council

RE: Affirmatively Furthering Fair Housing and Opportunity in North Highline Neighborhoods

Recognizing that:

- (1) Opportunity gives people access to what they need to succeed.
- (2) According to a 2011 Opportunity Mapping Analysis, White Center is a "low opportunity neighborhood" with "some of the worst health outcomes in King County... ranking number one for diabetes-related deaths, infant mortality, and heart disease...." The report also cites "academic achievement and poverty challenges." "School poverty has serious implications not just for students, but for districts, communities and the region."
- (3) In 1970, North Highline's median household income was \$1,200 only less than King County's. By 2010, the gap had grown to almost \$30,000 and 25% of us were living in poverty.
- (4) The Seattle-King County region is experiencing a high-tech boom. Despite the wealth of information it could be accumulating, King County continues to rely on programs to achieve social equity. Programs are important, but they come and go. Policies are the way government makes real, lasting change. Good government requires fact-based policies. The people of North Highline deserve to live in a community of opportunity. (Emphasis added.)

We, the undersigned:

Ask King County to conduct a Fair Housing Assessment and Opportunity Analysis of the North Highline community as part of White Center's "community of opportunity" designation. "

More than a decade has passed since the 2011 Opportunity Analysis. King County is now proposing a Subarea Plan and Inclusionary Zoning legislation that will decrease opportunity and increase ethnic and economic segregation and concentrate even more subsidized housing in a low opportunity, struggling area.

Subsidized housing, segregation and the lack of opportunity it brings are not limited to King County as discussed in **Out of Balance: Subsidized Housing, Segregation and Opportunity in Connecticut.**

"Our nation's painful history of intentional government-sponsored segregation, and current seemingly entrenched housing policies, separate us by race and income. And this has consequences: Data reveals significantly improved outcomes for low-income families who choose to move from high poverty to lower poverty neighborhoods, if they have that option."

Out of Balance Report - Open Communities Alliance (ctoca.org)

Again: Why should we rely on the data in "Appendix A: Supporting Maps and Tables...data, charts, and maps that supported the development of the Subarea Plan" since King County's disclaimer clearly says we can't?

"...King County makes no representations or warranties...as to its accuracy, completeness, timeliness, or right to use such information...."

Why is KC proposing a plan that will mold the future of this neighborhood without facts? **Facts matter!** As referenced above, according to HUD:

"In addition to barring housing discrimination, the Fair Housing Act requires HUD and its funding recipients, such as local communities, to also take affirmative steps to remedy fair housing issues such as racially segregated neighborhoods, lack of housing choice, and unequal access to housing-related opportunities."

I saw no mention in King County's Subarea Plan and associated documents of the Fair Housing Act or AFFH. It is not sufficient to cite "Community Priorities" when the community is largely poor folks, many of whom believe North Highline is their only option because they have been displaced from Seattle or are immigrants who came to White Center because of the subsidized housing. Opportunity matters!

Given the opportunity and facts, why wouldn't people be willing, even happy, about moving to West Seattle where they'd be living in a community that offers more opportunities for a healthy, better, and longer life?

As the 2011 Opportunity Analysis showed: White Center/Boulevard Park had some of the worst health outcomes in King County in 2009, ranking number one for diabetes-related deaths, infant mortality, and heart disease. (p. 7)

2019 CITY HEALTH PR	OFILES: Percentage An	nong 48 King County Areas			
Public Health of Seattle & King County Data (Updated 8.31.21)					
	North Highline	West Seattle			
POVERTY					
Receive Food Stamps	27.5%	4.2%			
Below Poverty	17.2%	5.6%			
Below 200% Poverty	39%	12.5%			
	North Highline	West Seattle			
HEALTH					
Fair or Poor Health	26%	10%			
Unmet Medical Need	30%	11%			
MORTALITY					
Infant Mortality	7.4%	3.1%			
Life Expectancy	79.6%	83.6%			

"America is one of only three advanced countries which spends less on the education of poorer children than richer ones" (Minton-Bedoes, 2012). A child's zip code continues to play a role in that child's future.... By providing high-quality education for all students, we can make sure that all students have the potential to succeed no matter what they can afford.... graduating from high school and going to college, obtaining a postsecondary degree can mean the difference between a lifetime of poverty and a secure job to bring in money to support you

and maybe a future family. However, in the United States, high school graduation and college-readiness rates are alarmingly low. "Just over 69 percent of students—and only about 50 percent of African-American, Hispanic and low-income students—graduate from high school on time, many without the skills needed for college or work." ("Education and Poverty")

Poverty Affects Many Students In Education, Although It | Bartleby

If they have the facts, what parent wouldn't want their child to graduate from 113th ranked West Seattle High instead of 318th ranked Evergreen High School?

2020 Washington High School Rankings https://www.schooldigger.com/go/WA/schoolrank.aspx Highest to Lowest of 418 High Schools in Washington State				
State Rank	School	School District	Free & Discount Lunch Recipients	
113	West Seattle HS 3000 California Ave SW 98116	Seattle	19%	
318	Evergreen HS 830 SW 116 th St. 98146	Highline	76% Over the 50% Tipping Point*	

^{* &}quot;Researchers commonly refer to a "tipping point," that point at which a school crosses a threshold and the challenges associated with poverty in the school spirals beyond the control of the school. Most experts place that point at 50%. At this point, all students' prospects are depressed."

Opportunity Analysis of White Center by Kirwan Institute (2011)

Not surprisingly, Evergreen's low ranking can be tied to its high poverty level - **76% of students receive free and discount lunches** - which mirrors the struggle with poverty that exists in the community at large.

Another area of inequity identified in the 2011 Opportunity Analysis is access to parks and greenspaces.

According to the Opportunity Analysis, "Within White Center there are 5 parks, comprising just **2.8%** of the total land area compared with **10.2%** in Seattle proper.17 (p. 45)"

This inequity is common in poor, segregated neighborhoods. The University of British Columbia conducted a study of parks and greenspaces in 10 US cities, including Seattle. The study compared the amount of parkland and greenspaces in neighborhoods with residents' income, race, and education.

"Vegetation keeps our cities cool, improves air quality, reduces storm water runoff and reduces stress -- it makes a huge difference in citizens' well-being," said lead author Lorien Nesbitt, a postdoctoral research and teaching fellow in the department of forest resources management at UBC's faculty of forestry. The issue is that when access to greenery isn't equitable, those benefits aren't always fairly distributed, reducing access for our most marginalized citizens who need them most....people should be able to access parks within a

10-minute walk from home, and trees and vegetation along their street or in their backyard..."

Lack of fair access to urban green spaces -- ScienceDaily

These are only a few examples of the inequities North Highline suffers.

Since my time to comment on the North Highline Subarea Plan is running out, I have three more questions.

According to page 18 of the NH SAP:

"The 2019-2044 growth targets for North Highline proposed by the King County Growth Management Planning Council are 1,400 housing units and 1,220 jobs. These targets reflect the subarea's role in accommodating growth given planned transit investments and urban centers designated in the Comprehensive Plan, and are achievable within the current zoned capacity of the subarea."

That seems to conflict with the NH SUP, which adds an unknown number of units.

Voluntary and mandatory inclusionary zoning (MIZ) are being proposed to accomplish the unknown amount of growth that would result from NH SAP. MIZ has been used to increase housing in high opportunity neighborhoods for decades. Where has inclusionary zoning been used to increase low-income housing in poor neighborhoods like North Highline? What has been the long-term (at least 10 year) result?

Another focus of the NH SUP is keeping property values low. This is a traditional result of American ghettoes. Because they are economically segregated, they are also ethnically segregated. As a result, keeping North Highline property values low is likely to result in generational poverty. How is that that equitable or just? How does that conform with AFFH?

"In 2020, of the 74 million children living in the United States,³³ an estimated 1 in 6 children lived in poverty.³⁴ There were more children in poverty than individuals of any other age group.³⁵ This data suggest that perhaps intergenerational poverty is the leading factor of poverty across the nation."

<u>Intergenerational Poverty in the United States — Ballard Brief</u>