Memo

То:	King County Affordable Housing Committee Members
From:	McCaela Daffern, Regional Affordable Housing Implementation Manager
cc:	Housing Interjurisdictional Team
Date:	November 9, 2023
Re:	Revised Draft AHC Federal and 2024 State Legislative Priorities

Summary

This report provides background on the development of the Affordable Housing Committee (AHC or the Committee) Federal and 2024 State Legislative Priorities and amendments proposed by AHC members. AHC members should prioritize reviewing the proposed amendments in advance of the November 16 AHC meeting and prepare to possibly adopt state and federal legislative priorities at the meeting.

Process to Date

The AHC's 2023 work plan states that the AHC will potentially adopt state or federal legislative priorities. In consultation with the Housing Interjurisdictional Team and consistent with potential King County priorities, staff developed draft priorities that:

- 1. align with the AHC's Shared Revenue Principles;
- 2. support implementation of 2023 AHC State Legislative Priorities;
- 3. resurface 2023 AHC State and 2021 Federal Legislative Priorities that did not pass;
- 4. adjust priorities that reference bills that passed last state legislative session; and
- 5. include more detail about federal fund sources in King County.

At the September 21 AHC meeting, AHC staff briefed Committee members on the draft AHC federal and 2024 state legislative priorities and timeline for adoption. The Committee provided feedback during the meeting, and AHC staff solicited potential amendments from the AHC on October 23, with a deadline of November 2. This staff report includes the following exhibits:

- 1. Draft 2024 AHC state legislative priorities;
- 2. Draft AHC federal legislative priorities;
- 3. Proposed amendments from two AHC members;
- 4. Crosswalk of draft 2024 AHC state legislative priorities and other relevant agendas;
- 5. Housing Development Consortium 2024 Lead Advocacy Agenda; and
- 6. South King Housing and Homelessness Partners 2024 Legislative Priority.

Next Steps and Timeline

Committee members will consider and may adopt amendments and approve the legislative priorities during the November 16 AHC meeting. If approved, AHC staff will post the legislative priorities by the end of November and the AHC Chair will circulate the adopted agendas to the state and federal delegation representing King County communities.

Exhibit 1: Draft 2024 Affordable Housing Committee State Legislative Priorities

Revised draft per AHC feedback at 9/21/2023 AHC meeting King County Affordable Housing Committee's

2024 State Legislative Priorities

The King County <u>Affordable Housing Committee</u> of the Growth Management Planning Council recommends actions and assesses regional progress towards advancing affordable housing solutions. The King County Countywide Planning Policies recently established that the county needs to add approximately **195,000 net new affordable units** by 2044 to ensure that no low-income household pays more than 30 percent of its income on housing. That means countywide, the region must build or preserve an average of 9,750 affordable units every year for the next 20 years to meet the need. With current resources, about 3,700 affordable homes are built or preserved each year, leaving **an annual remaining gap of 6,050 units**.

We appreciate the state rising to the challenge in recent years, authorizing new revenue tools for affordable housing, specifically the:

- Affordable and Supportive Housing Sales and Use Tax Credit (RCW 82.14.540, authorized by 2019 SHB 1406) authorizing a new state-shared local tax; and
- Housing and Related Services Sales and Use Tax (RCW 82.14.530, authorized by 2020 HB 1590) of up to 0.1 percent which can now be imposed councilmanically.

Based on an analysis we performed in 2021, together, an estimated \$22.5 million had been collected since enactment of this new authority. Combined, this represented about 0.1 percent of the overall \$18 billion we projected needing from existing and new revenue sources between 2019 and 2024 and about 0.5 percent of the local share of \$5 billion in revenue needed.¹ This points to the need for substantial new public revenue to ensure that all low-income households in King County haves a place to call home that they can afford.

In light of this, the committee of 17 elected, nonprofit, and business leaders adopted these state legislative priorities, which call on the state government to:

- increase funding to preserve, operate, and increase the supply of affordable housing;
- support equitable housing planning, monitoring, and community engagement; and
- help people remain stably housed.

Affordable Housing Committee's 2024 State Legislative Priorities

1. Preserve and increase the supply of affordable housing

a. Increase and find a dedicated source of funding for the Housing Trust Fund, the state's primary source of financial equity for developing and preserving affordable housing across Washington State. This is a critical source of leverage for housing projects in King County.

¹ May 14, 2021 Revenue and Expenditure Monitoring for Affordable Housing staff report to King County Affordable Housing Committee members [link].

- b. Create or authorize a new permanent funding source for affordable housing that minimizes disproportionate burden on low-income households to the greatest extent possible, keeps pace with rising capital and operating costs, and retains local flexibility to support uses including:
 - i. Capital investments and ongoing operating and services support for new and existing projects serving households below 50 percent area median income. This includes support for permanent supportive housing and workforce housing serving households below 30 percent area median income.
 - ii. Projects that promote access to opportunity, prevent and mitigate displacement, and create wealth building opportunities for Black, Indigenous, and People of Color communities most disproportionately impacted by housing cost burden. This should include funding for capacity building for community organizations to develop community-driven projects, land acquisition, affordable homeownership, and the non-housing project components that meet the needs identified by communities most disproportionately impacted by housing cost burden.
- c. Exempt affordable housing construction and rehabilitation costs from sales tax.
- d. Identify an insurance coverage and cost solution for affordable housing providers that addresses the increasing cost of deductibles and premiums, including for builder's risk, property, and liability insurance.
- e. Expand and make permanent the Connecting Housing to Infrastructure Program (CHIP) Grants Program.

2. Support local jurisdictions in planning for and accommodating housing affordable to households at or below 80 percent area median income

- a. Fund Commerce to provide technical assistance to jurisdictions in complying with requirements set forth in 2021 House Bill 1220.
- b. Fund Commerce to evaluate the effectiveness of 2021 House Bill 1220 in meeting its stated goals in the Puget Sound region and prepare recommendations based on findings.
- c. Identify and share best practices, model legislation, and other tools to support effective and equitable jurisdictional implementation of comprehensive plan housing policies.
- d. Increase housing affordability near planned and existing high capacity and frequent transit.
- e. Replace the arbitrary one percent property tax cap and provide flexibility for local governments to implement a more progressive tax system.
- f. Give jurisdictions the authority to easily capture value from commercial development for affordable housing.

3. Increase housing stability for low-income households

- a. Maintain or expand the Housing and Essential Needs program to keep up with rising rents for the lowest income community members.
- b. Increase behavioral health resources to support housing stability for people living in supportive and affordable housing.

- c. Increase equitable opportunities for tenants to learn about and enforce their rights.
- d. Increase funding for legal assistance to help keep tenants housed.
- e. Ban discrimination against renters based on a prior criminal record.
- f. Protect tenants from excessive rent increases and related fees by strengthening statewide requirements for notice of residential rent increases.

Exhibit 2: Draft Affordable Housing Committee Federal Legislative Priorities

Revised Draft per AHC Feedback at 9/21/2023 AHC meeting King County Affordable Housing Committee's

Federal Legislative Priorities

The King County Affordable Housing Committee of the Growth Management Planning Council recommends actions and assesses regional progress towards advancing affordable housing solutions. The King County Countywide Planning Policies recently established that the county needs to add approximately **195,000 net new affordable units** by 2044 to ensure that no low-income household pays more than 30 percent of its income on housing. That means countywide, the region must build or preserve an average of 9,750 affordable units every year for the next 20 years to meet the need. With current resources, about 3,700 affordable homes are built or preserved each year in King County, leaving **an annual remaining gap of 6,050 units**.

In light of this, the committee of 17 elected, nonprofit, and business leaders adopted these federal legislative priorities, which call for significantly increased federal investments in affordable housing to address the critical need for more affordable homes in King County.

Affordable Housing Committee's Federal Legislative Priorities

- 1. Strengthen and expand the Low-Income Housing Tax Credit (LIHTC) Program: LIHTC is the single largest driver of affordable housing production and preservation in the nation. The bipartisan "Affordable Housing Credit Improvement Act" (S.1557/H.R.3238 of 2021), sponsored by Sen. Maria Cantwell and Rep. Suzan DelBene, among others, would expand production and help preserve affordable housing—producing an additional two million more rental homes nationwide than would otherwise be possible over the next decade. It would also provide state Housing Credit allocating agencies new tools to strengthen program administration, including rule changes to improve access for veterans, students, and victims of domestic violence and human trafficking.
- 2. Expand affordable housing resources in the federal budget: The federal government is a critical partner for addressing the housing crisis in King County. King County and its Consortium receive important grant funding from the federal government through the Community Development Block Grant, HOME Investment Partnership, and Emergency Solutions Grant. However, the grant amounts have not kept pace with the increasing need for affordable housing and are an increasingly small component of the affordable housing response in King County.
 - The King County, Seattle, and Renton Housing Authorities provide significant resources for affordable housing in our region. However, the King County Housing Authority's waitlist for Housing Choice Vouchers has been closed since March 2020 due to inadequate resources.
 - The Department of Housing and Urban Development's Section 4 Capacity Building for Community Development and Affordable Housing Program enhances the ability for nonprofits to navigate the complex process of affordable housing development. Increasing Section 4 funding could support equitable development efforts in King County that seek to increase control and ownership of affordable housing within Black, Indigenous, and People of Color communities.

• Enacting a full-year spending bill with the highest funding possible for housing and community development programs would have a meaningful impact towards meeting King County's housing needs.

Exhibit 3: Proposed Amendments to Draft Affordable Housing Committee Federal and 2024 State Legislative Priorities

Amendment #	Sponsor	Amendment	Context Statement
1.1	Maiko Winkler-Chin, Director of the Seattle Office of Housing on behalf of Mayor Bruce Harrell	Amendment to 2024 State Legislative Priority 1.c : "Exempt <u>publicly funded</u> affordable housing construction and rehabilitation costs from sales tax."	Without this modifier a sales tax exemption on housing construction and rehabilitation costs could apply to properties not subject to restrictive housing covenants or for which the cost of housing units is not below market-rate given the geographic location or type and configuration of the units.
1.2	Robin Walls, Executive Director/CEO of King County Housing Authority	Amendment to Federal Legislative Priority 2: "((The King County, Seattle, and Renton Housing Authorities provide significant resources for affordable housing in our region. However, the King County Housing Authority's waitlist for Housing Choice Vouchers has been closed since March 2020 due to inadequate resources.)) Federally-subsidized rental assistance administered by the King County, Seattle, and Renton Housing Authorities provides permanent affordable housing supports primarily for households earning less than 30% of AMI. Housing Choice Vouchers are a proven, flexible, and effective resource, but demand from eligible households far exceeds the supply. Congress should enact a significant expansion of general purpose Housing Choice Vouchers to bring needed relief to households in King County."	National industry groups as well as the Association of Washington Housing Authorities continue to call for the expansion of the Housing Choice Voucher program. HCVs can be used in a variety of ways to address local housing challenges and keep families in their homes in King County, preventing displacement. They are providing operating support and affordable rents at permanent supportive housing (PSH) while providing the broader community access to quality and affordable housing throughout the region.

Exhibit 4: Crosswalk of Draft Affordable Housing Committee State Legislative Priorities to Other Relevant Agendas

AHC State Legislative Priorities, Draft	Housing Development Consortium of Seattle- King County	South King Housing and Homelessness Partners
1.a. Increase and find a dedicated source of funding for the Housing Trust Fund, the state's primary source of financial equity for developing and preserving affordable housing across Washington State. This is a critical source of leverage for housing projects in King County.	~	\checkmark
 1.b. Create or authorize a new permanent funding source for affordable housing that minimizes disproportionate burden on low-income households to the greatest extent possible, keeps pace with rising capital and operating costs, and retains local flexibility to support uses including: i. Capital investments and ongoing operating and services support for new and existing projects serving households below 50 percent area median income. This includes support for permanent supportive housing and workforce housing serving households below 30 percent area median income. ii. Projects that promote access to opportunity, prevent and mitigate displacement, and create wealth building opportunities for Black, Indigenous, and People of Color communities most disproportionately impacted by housing cost burden. This should include funding for capacity building for community organizations to develop community-driven projects, land acquisition, affordable homeownership, and the non-housing project components that meet the needs identified by communities most disproportionately impacted by housing cost burden. 		✓ Identifies need for full funding for permanent supportive housing, but not a need for a new fund source
1.c. Exempt affordable housing construction and rehabilitation costs from sales tax.		
1.d. Identify an insurance coverage and cost solution for affordable housing providers that addresses the increasing cost of deductibles and premiums,	\checkmark	

AHC State Legislative Priorities, Draft	Housing Development Consortium of Seattle- King County	South King Housing and Homelessness Partners
including for builder's risk, property, and liability insurance.		
1.e. Expand and make permanent the Connecting Housing to Infrastructure Program (CHIP) Grants Program.		
2.a. Fund Commerce to provide technical assistance to jurisdictions in complying with requirements set forth in 2021 House Bill 1220.		
2.b. Fund Commerce to evaluate the effectiveness of 2021 House Bill 1220 in meeting its stated goals in the Puget Sound region and prepare recommendations based on findings.		
2.c. Identify and share best practices, model legislation, and other tools to support effective and equitable jurisdictional implementation of comprehensive plan housing policies.	✓ "Shape the framework for Housing Element updates across King County and help jurisdictions implement zoning regulations allowing for affordable and middle housing"	
2.d. Increase housing affordability near planned and existing high capacity and frequent transit.	Specifically advocates for a funding framework for counties and cities to acquire land near transit for affordable	

AHC State Legislative Priorities, Draft	Housing Development Consortium of Seattle- King County	South King Housing and Homelessness Partners
	homes (Housing Benefit District)	
2.e. Replace the arbitrary one percent property tax cap and provide flexibility for local governments to implement a more progressive tax system.		
2.f. Give jurisdictions the authority to easily capture value from commercial development for affordable housing.		
3.a. Maintain or expand the Housing and Essential Needs program to keep up with rising rents for the lowest income community members.		
3.b. Increase behavioral health resources to support housing stability for people living in supportive or affordable housing.		
3.c. Increase equitable opportunities for tenants to learn about and enforce their rights.	\checkmark	
3.d. Increase funding for legal assistance to help keep tenants housed.		
3.e. Ban discrimination against renters based on a prior criminal record.	\checkmark	
3.f. Protect tenants from excessive rent increases and related fees by strengthening statewide requirements for notice of residential rent increases.		



2024 Lead Advocacy Agenda

The Housing Development Consortium of Seattle-King County (HDC) is the nonprofit membership association of 200+ private businesses, nonprofit organizations, and public partners dedicated to the vision that all people throughout King County live with dignity in safe, healthy, and affordable homes. HDC invites you to join us as we advocate for the following policies in 2024.

FUND AFFORDABLE HOMES

Addressing the affordable housing crisis will take a comprehensive and holistic approach and cannot be solved without vastly increasing the funding for affordable housing. Significantly increasing capital and operating dollars to support the production of affordable housing is a priority for us. Because our need for housing is tremendous, we need funding at every level—local, state, and federal—to collaborate and think creatively about leveraging resources. In 2024, HDC will:

- Advocate for a state bill to authorize an expanded Real Estate Excise Tax (REET) for affordable housing.
- Fund the State Housing Trust Fund (HTF) at a historically high level in the biennial Capital Budget and establish a permanent funding source for the HTF.
- Lead the work to create a framework for regional investments in affordable housing.
- Support the update of the Seattle Housing Levy Administrative & Financial Plan.
- Advocate for investments in affordable homeownership to create new homes for buyers that include those eligible for the Covenant Homeownership Account Program, among other programs.
- Support implementation of the JumpStart Seattle spend plan and its robust allocation for affordable homes.

BUILD & MAINTAIN INCLUSIVE COMMUNITIES

To promote equitable growth and prosperity for all, King County and our cities should implement best practices and policies that ensure low-income residents can live or remain in communities of opportunity near jobs, services, and transit. This must be accompanied by recognizing that the segregation created by government policies, like redlining and other discriminatory practices, resulted in long-lasting racial inequities in housing. In 2024, HDC will:

• Lead the Complete Communities Coalition work on the major update of Seattle's Comprehensive Plan—a rare, critical opportunity to change the City's land use strategy and its support for housing affordability.

- Advocate for mandatory inclusionary zoning in Bellevue through a Comprehensive Plan Update that leverages commercial and residential development growth.
- Shape the framework for Housing Element updates across King County and help jurisdictions implement zoning regulations allowing for affordable and middle housing.
- Advocate for regulatory reform and effective departmental coordination to accelerate housing production and reduce the cost to build housing, including:
 - o Increasing allowed densities, height, and floor area ratios.
 - Facilitating efficient permitting and coordination between responsible departments.
 - o Advancing utility waivers for affordable homes.
 - o Exempting affordable housing developments from infrastructure improvement fees.
 - o Eliminating design review for affordable homes.
 - Reducing or eliminating parking requirements.
 - o Exempting affordable housing from ground floor commercial space requirements.
 - o Supporting funding to offset costs of creating community-serving ground floor uses.
- Lead education and coalition building initiatives on statewide efforts to create a funding framework for counties and cities to acquire land near transit for affordable homes.
- Partner in leading and continuing support for the Black Home Initiative Policy Framework and regulatory reform recommendations.

IMPROVE HEALTH, STABILITY & SUSTAINABILITY OF HOUSING

Far too many low-income King County households—disproportionately people of color—are now perpetually housing insecure or pushed into homelessness. Enveloping everything is the climate crisis. In recognition of the issue's urgency and the effects of the built environment, HDC looks at housing unaffordability, the inequity that leads to housing insecurity, and climate change as fundamentally interdependent. Affordable, safe, quality housing is a social determinant of health and a key element in creating an overall healthy community. This calls for a proactive approach to ensure housing stability for renters and low-income homeowners, and a sustainable built environment for heathier and livable places. In 2024, HDC will:

- Advocate for sustainable operations funding at the state level to address the operating challenges faced by affordable housing providers.
- Lead education and advocacy work to ensure affordable housing providers can obtain reliable and affordable property and liability insurance.
- Promote policies, practices, funding, and incentives that support affordable housing in reducing energy and water use, minimizing carbon emissions, and optimizing for the health and safety of residents.



2024 Support Advocacy Agenda

The Housing Development Consortium of Seattle-King County (HDC) is the nonprofit membership association of 200+ private businesses, nonprofit organizations, and public partners dedicated to the vision that all people throughout King County live with dignity in safe, healthy, and affordable homes. HDC invites you to join us as we advocate for the following policies in 2024.

FUND AFFORDABLE HOMES

- Advocate for progressive revenue that will ease the burden on low-income and working households, adequately fund affordable housing and homelessness programs, and make our economy more resilient in the long-term.
- Support federal advocacy for expanded funding for affordable housing, including through Low Income Housing Tax Credit (LIHTC) reforms to:
 - Renew the temporary 12.5% increase in LIHTC allocations that expired in 2021.
 - Increase the allocation of the 9% LIHTC by 50%.
 - Reduce the tax-exempt private activity bonds threshold test for the 4% LIHTC from 50% to 25%.
 - Provide a 50% basis boost for homes set aside for extremely low-income households in 9% LIHTC properties.
- Advance funding and policy solutions that reflect the role of affordable homeownership in ensuring wealth-building for individuals and families affected by racial and ethnic segregation, marginalization, and discrimination, including:
 - Increase the per-household funding cap for affordable homeownership projects imposed by King County and the Washington State Department of Commerce.
 - Establish a new revolving construction loan fund for affordable homeownership.
 - Support reforms to allow jurisdictions increased flexibility to allocate affordable housing funding for affordable homeownership and operations, maintenance, and service needs.
 - Expanding the real estate excise tax exemption to all affordable homeownership developments.
- Support policies that improve pay, equity, and sustainability in the affordable housing sector.
- Support the exemption of publicly funded affordable housing projects from sales taxes on construction materials.

BUILD & MAINTAIN INCLUSIVE COMMUNITIES

To promote equitable growth and prosperity for all, King County and our cities should implement best practices and policies that ensure low-income residents can live or remain in communities of opportunity near jobs, services, and access to transit. This must be accompanied by recognizing that the housing segregation achieved by government policies, such as redlining and other discriminatory practices, resulted in long-lasting racial inequities in housing. Support policies that empower BIPOC-led community-based organizations, such as the JumpStart Community Self-Determination Fund. In 2024, HDC will:

- Support a state-level bill to enable lot-splitting.
- Advocate for expansion of permanent supportive housing as a proven solution for homelessness.
- Support Seattle's Equitable Development Zoning Pilot and facilitate expansion of land use policies to support increased capacity for affordable housing development.
- Support implementation of the countywide Equitable Development Initiative fund.
- Support use of anti-displacement strategies like acquisition of naturally occurring affordable housing, community ownership or preference, right of first refusal, tenant opportunity to purchase, etc.
- Support disposition of publicly owned surplus or underutilized land at reduced or no cost for affordable housing.
- Support implementation of the Health through Housing Initiative in King County.

IMPROVE HEALTH, STABILITY & SUSTAINABILTY OF HOUSING

Households faced with high-cost burdens, housing instability, and homelessness may see the impacts of those experiences on both their physical and mental health. Affordable, safe, quality housing is a social determinant of health and a key element in creating an overall healthy community. In addition, the climate crisis' intersection with housing calls for a proactive approach to ensure a sustainable built environment for heathier and livable places. In 2024, HDC will:

- Support efforts to establish well-calibrated rent stabilization, among other tenant protections, to increase resident stability while ensuring housing providers can sustainably operate affordable housing and create new housing.
- Support state policies that address the arbitrary barriers that people exiting the criminal justice system face in renting housing.
- Advocate for increased funding for rental assistance.

- Support funding of housing counselors working to prevent foreclosures and assist first-time homebuyers.
- Support the implementation of Apple Health and Homes and its efficient utilization for permanent supportive housing development.
- Continue education efforts on the impact of Residential Prevailing Wage rates and work towards a methodology that supports affordable housing production and provides relief for small projects.

South King Housing and Homelessness Partners (SKHHP)

Auburn • Burien • Covington • Des Moines • Federal Way • Kent • Maple Valley • Normandy Park • Renton • Tukwila • King County

Legislative Priority

South King County is facing a growing affordable housing crisis. In order to address this crisis, we need to fund all aspects of affordable housing, including:

- Homeownership for moderate income households and below
- Preservation of naturally occurring affordable housing (NOAH)
- Land acquisition to secure permanent affordability
- Permanent supportive housing (PSH)
- Infrastructure around affordable housing developments
- Workforce housing

Our Communities

- Residents in South King County face rising housing costs and decreasing affordable supply in ways not found elsewhere in King County.¹
- SKHHP member cities are under intense pressure to support their residents' ability to remain in the community.
- 52% of South King County residents identify as persons of color.²
- SKHHP member cities' average household income is 36% lower than King County's (\$97,975 vs \$154,122).³
- Life expectancy among South King County residents declined between 2011 and 2021.⁴
- In King County, infant mortality is highest in South King County, where babies are twice as likely to die before their first birthday than babies born in East King County.⁵

Housing Capital Fund

SKHHP member cities pool funds to support the production and preservation of affordable housing in South King County through the SKHHP Housing Capital Fund. Funding supports the needs of low-income households earning up to 60% of area median income. Funding priorities include projects that advance racial equity, geographic equity, and economic opportunity. To date, 109 units of affordable housing in South King County have been supported by SKHHP and over \$7 million has been pooled.

Executive Board

SKHHP is governed by a joint board, referred to as the Executive Board, created by an Interlocal Agreement. Each SKHHP partner jurisdiction appoints an elected official or administrator to serve as their representative to guide the work of SKHHP staff. The Executive Board sets SKHHP's workplan and budget and makes final recommendations on Housing Capital Fund projects.

Community Advisory Board

An advisory board made up of members of the community and local housing organizations provides guidance to the Executive Board and informs the selection of Housing Capital Fund projects. The Advisory Board ensures representation of South King County's diverse communities within SKHHP's work.

- 4 King County Community Health Needs Assessment 2021/2022 (p. 115-116)
- 5 King County Community Health Needs Assessment 2021/2022 (p. 115)

Who We Are

Formed in 2019 by an Interlocal Agreement, we are a collaboration between 10 South King County cities and King County united under the common goal to ensure the availability of housing for all income levels of residents in South King County. We achieve this through a focus on the production and preservation of affordable housing, partnership with public and private organizations, pooling and sharing resources, and advancing housing policies.

Purpose

Create a coordinated, comprehensive, and equitable approach to increasing housing stability, reducing homelessness, and producing and preserving quality affordable housing in South King County.

SKHHP Staff Contact

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Program Coordinator Dorsol Plants Phone: 253.804.5089 dplants@skhhp.org



For more info: Scan QR Code or visit skhhp.org

¹ Puget Sound Regional Council: <u>Regional Housing Strategy 2022 Monitoring Report</u> (p. 31)

^{2 2021} American Community Survey 5-year Estimates: P1 - Race

³ Calculated the weighted average household income of SKHHP member cities using total number of households by city and average household income by city as published in the 2021 ACS: <u>S1901 – Income in the Past 12 Months</u>