

## Equity Analysis

---

December 2023

*Equity Work Group Workplan & Recommendations  
Excerpt from 2024 Comprehensive Plan Equity Analysis*



**King County**

## C. Community Engagement & Equity Work Group

### 1. Formation

The process improvements to expand the reach and accessibility of public involvement in the 2024 Update netted levels of public interest, engagement, and input that vastly superseded previous Updates. To reach the community engagement goal of “County engages in dialogue,” the Update process required means for sustained conversation with community for deep conversations to help facilitate the advancement of solutions to complex problems, in addition to general public engagement. The power mapping analysis revealed not only the limited role for the public in shaping the development of the Plan, but also the need for developing community capacity to engage on complex conversations about comprehensive planning topics. The formation of the Equity Work Group was driven by this need for deeper community engagement (two-way dialogue, building capacity, and centering community input) focused on the needs and interests of priority populations disproportionately affected by Plan proposals, while building understanding and awareness of comprehensive planning more generally.

Equity Work Group members would gain the opportunity to experience the evolving Update process to build understanding of comprehensive planning topics, and to provide direct input to shape the direction and content of equity impact review, plan proposals, and engagement efforts. The Equity Work Group's experience would also inform future efforts to move Plan engagement up the community engagement continuum and increase process equity.

## 2. Composition

The Equity Work Group was comprised of 15 individuals representing communities and places historically underrepresented in King County's comprehensive planning efforts. While representation was not proportional to the demographic distribution with unincorporated King County, all Equity Work Group members were members of BIPOC communities, and many members were residents or worked in different geographic communities within unincorporated King County, including North Highline, Skyway-West Hill, and East Federal Way. Members included participants of other King County equity cabinets or convened work groups, as well as individuals recommended by community-based groups engaged in King County's equity and racial and social justice work. Members were compensated for their participation at standard compensation rates for 2022-23.

## 3. Workplan

The Equity Work Group met 16 times between September 2022 and October 2023. Staff from various County Executive departments (department staff) attended to better understand the lived experience of community members, participate in more nuanced discussions of community input, and discuss the potential equity impacts of proposals.

In December 2022, the Equity Work Group approved a workplan (Figure 68) to outline its efforts and priorities for 2023. The Equity Work Group identified three focus areas to maximize their influence and build upon the interests and strengths of its members: housing proposals, the equity impact review process, and public engagement efforts.

The Equity Work Group's efforts supporting public engagement on the Update began with review and advisement on public engagement survey content. Members were also critical in advocating for in person engagement, identifying and attending community events for tabling opportunities, and shaping and attending the Public Review Draft open house.

To support deeper discussion on the housing proposals, the Equity Work Group met for several educational sessions to learn about land use and housing planning and to delve into specifics about affordable housing issues within King County. In conversation, staff from the Department of Community and Human Services (DCHS), Department of Local Services, Regional Planning, and the Office of Equity and Racial and Social Justice learned which community hopes, values, fears, and shared experiences were important to consider to ensure equitable outcomes in the housing proposals.

These early conversations also led the Equity Work Group to begin crafting a series of questions to help County staff evaluate and consider equity implications of Plan proposals as part of the equity impact review of the Update. To further the spirit of two-way channels of communication and multiple interactions, department staff provided responses to the Equity Work Group's questions as well as to follow-up questions. This iterative process encouraged both County staff and Equity Work Group members to collaborate in looking for opportunities and identifying unintended consequences to strengthen the proposals.

Figure 68: Equity Work Group 2023 Workplan

Approved Workplan Component	Approved Workplan Description	Equity Work Group Activities
<b>Public Engagement</b>	Work Group members will have an opportunity to be lead and/or participate in various aspects of the public engagement efforts for the comprehensive plan.	<p>Provided input on scoping and early concepts draft proposal survey questions</p> <p>Provided input and prioritized events and locations for in person engagement on Public Review Draft</p> <p>Hosted King County staff at community events and centers</p>
<b>Equity Impact Review</b>	The Work Group will provide feedback on current conditions and community context to integrate racially disparate impacts and illuminate missing data to tell a more compelling story about the conditions in unincorporated King County. Members of the Work Group will also develop a set of questions in dialogue with county staff to ensure that plan proposals are centering equity.	<p>Provided input on current conditions report content</p> <p>Developed standard Equity Analysis Question and guiding prompts</p> <p>Provided review of and input on King County staff equity analysis</p>
<b>Housing Proposals</b>	Work Group members will engage in dialogue with county staff to ensure that the selected proposals for the affordable housing strategies centers equity and community needs. Work Group members will have an opportunity to access additional data, complete background readings, review policy and code language, and provide feedback to staff members throughout the development of affordable housing strategies.	<p>Engaged in initial topic discussions with King County staff subject matter experts</p> <p>Identified community priorities for housing proposal prioritization</p> <p>Provided input on housing proposals in the early concepts and Public Review Draft</p>

## 4. Priorities

The Equity Work Group's efforts to develop the equity analysis questions revealed its priorities for pro-equity and anti-racist outcomes of plan proposals. These priorities form the lens through which equity impacts are analyzed in the Proposals Review section below.

Specific to the housing proposals, the Equity Work Group identified the people, land use, and neighborhood qualities that should be centered in proposal development to achieve equitable outcomes.

Each set of priorities are listed in Figure 69.

Figure 69: Equity Work Group Priorities

Priorities	
<b>Equitable Outcome Priorities</b>	Address and repair structural, racial inequities from land use policies and disparities in the Determinants of Equity
	Encourage and support equitable, thriving existing communities
	Safe and responsible growth for new residents and businesses
	Removing barriers for those most directly affected by structural, racial inequities
	Expand opportunities for racial equity and social justice
	Policies, programs, and investments that balance the negative consequences
<b>Housing Proposal Priorities</b>	Centering the needs and experiences of youth, elders, immigrant communities, and families, particularly multigenerational and single parent families
	Creating mixed-income neighborhoods
	Cultural preservation and strengthening existing communities, including small businesses and community organizations
	Creating opportunity for transit and open space access
	Creating mixed-use neighborhoods

## 5. Input on Plan Process and Proposal Development

Beyond shaping the equity impact review process, the Equity Work Group provided input that influenced public engagement, the development of the Plan, and the Update process. The Equity Work Group's input was collected through its regular meetings, follow-up surveys, and in its review of staff responses to the equity analysis questions. A summary of the Equity Work Group's priorities and detailed input on housing proposals is contained in Equity Analysis Appendix C.

Figure 70 below describes how the Equity Work Group's workplan influenced the Update process and proposal development. The table shows how the input was supported by work already in progress or integrated to the planning process or Plan proposals or could potentially be supported by new bodies of work that are not currently resourced. The intent of this was to demonstrate where the current proposals advance the Equity Work Group's input, as well as highlight areas where the proposals could go further. The Equity Work Group's input influencing the Update process and proposal development was largely received before the release of the Public Review Draft and through August 2023, before proposals were finalized for the Executive Recommended Plan. The table in Figure 70 reflects language about and characterization of Plan proposals included in the Public Review Draft, reflecting the timing of the Equity Work Group's process and the development of this table for the Equity Work Group's review.

Figure 70: Equity Work Group Input and Executive Staff Response

Themes from Equity Work Group	Executive Staff Response
<div>1 Engagement and data</div> <div><ul style="list-style-type: none"><li>Illustrating incomes/AMI with types of jobs/actual incomes is helpful</li><li>Outreach on affordable housing should be by and for community</li><li>A robust and resourced community engagement plan ahead of future updates is essential</li><li>Discuss multiple, not just majority, themes in trend analysis</li><li>Prioritize unincorporated King County comments</li><li>Resource community participation, particularly those most impacted so they can be present early and often in the process, and recognize housing struggles and displacement prevent people from engaging</li></ul></div>	<div>New Strategies</div> <div><ul style="list-style-type: none"><li>Ensure Comprehensive Plan Work Plan Action<sup>175</sup> regarding improving comprehensive planning engagement reflects input</li><li>Include data input and framing in equity impact review of the 2024 Update</li><li>Amend housing policies to include equitable engagement processes</li><li>Add new definitions in the Comprehensive Plan for historically underserved and historically underrepresented communities</li></ul></div> <div>Work already underway</div> <div><ul style="list-style-type: none"><li><i>Program</i> - Building a database of evictions filed in King County since 2015</li><li><i>Policy</i> – Requires the County to use equitable engagement strategies to actively solicit public participation from a wide variety of sources, particularly from populations historically underrepresented or excluded from planning processes, in its planning processes, including the development, update, and implementation of King County plans</li><li><i>Study</i> – In the Equity Impact Review of the 2024 Update: 1) include stronger community input and context and 2) use visuals to illustrate complex issues</li></ul></div> <div>Current and Proposed Comprehensive Plan policies<sup>176</sup></div> <div><ul style="list-style-type: none"><li>King County shall initiate and actively participate in regional efforts to advance solutions that address critical affordable housing needs of all economic segments pursuant to the countywide housing growth targets and other goals established through the Countywide Planning Policies, such as adopting tenant protections, creating mandatory and incentive programs, and developing funding initiatives. King County shall invite jurisdictions, community members, private sector and housing representatives to identify and implement solutions.</li></ul></div>
<div>2 Inclusionary Housing</div> <div><ul style="list-style-type: none"><li>Prioritize requiring affordability within new development</li><li>Bonus programs that increase over time</li><li>Incentivize developments that plan to house more lower-income households (Below 50-80% AMI)</li><li>Low income/fixed income policies for seniors or elders</li><li>Preferences for strong incentives and mandatory inclusionary zoning,</li><li>Preference for community preference policies, excluding areas with limited BIPOC residents erases their existence and struggle</li><li>Enact an Multifamily Tax Exemption (MFTE) program (include a higher affordability limit with MFTE renewal)</li></ul></div>	<div>New Strategies</div> <div><ul style="list-style-type: none"><li><i>Study</i> – Include a Comprehensive Plan Work Plan Action to evaluate whether to expand the mandatory inclusionary housing and/or community preference development regulations to other areas of unincorporated King County (beyond the current areas in Skyway-West Hill and North Highline). Currently, only the voluntary portion of the inclusionary housing regulations is proposed two be expanded into other geographies (all of urban unincorporated King County and the Vashon and Snoqualmie Pass Rural Towns).</li><li><i>Study</i> – Include a Comprehensive Plan Work Plan Action to explore MFTE program feasibility for unincorporated King County.</li></ul></div> <div>Current and Proposed Comprehensive Plan policies</div> <div><ul style="list-style-type: none"><li>King County shall take actions to prevent and mitigate residential and cultural displacement for unincorporated communities at risk of displacement to address racial disparities in housing and help protect cultural communities for Black, Indigenous, and People of Color by supporting cultural institutions, community hubs, and using community preference programs for affordable housing that helps people with a connection to the local community remain in or return to their community of choice.</li></ul></div>

<sup>175</sup> The Comprehensive Plan Work Plan directs additional actions the County will take after adoption of the 2024 Update to: 1) further implement and refine the plan, and/or 2) continue work on issues that arose during plan development but there was not sufficient time or resources to complete the work prior to adoption.

<sup>176</sup> “Current and Proposed Comprehensive Plan Policies” includes applicable policies in the 2024 Update, either as currently adopted or as proposed in the Public Review Draft, that are responsive to the actionable themes in the Equity Work Group’s input. This version of the polices does not reflect the final language as proposed in the Executive Recommended Plan.

Themes from Equity Work Group	Executive Staff Response
<div>3Middle Housing</div> <div><ul style="list-style-type: none"><li>Middle housing posed as a solution for lower income households with incomes too high for subsidized housing</li><li>Concept of “fitting in” to existing (single family) neighborhoods is less important than developing housing supply</li><li>Access to nearby green/garden space, access to transit, and pedestrian safety are important middle housing considerations</li><li>Middle housing options focused for the rural area</li><li>Incentivize renting ADUs/middle housing to lower income households</li></ul></div>	<div>New Strategies</div> <div><ul style="list-style-type: none"><li><i>Development Regulations</i> - Expand the middle housing regulations to include density bonuses to incentivize middle housing developments near transit.</li></ul></div> <div>Current Comprehensive Plan policies</div> <div><ul style="list-style-type: none"><li>King County shall provide opportunities for development of middle housing to increase housing supply affordable to all incomes.</li></ul></div>
<div>4Specific Population Needs</div> <div><ul style="list-style-type: none"><li>Prioritize affordable housing for the lowest income residents</li><li>Incentivize lower-AMI affordable housing to developers</li><li>(Policies to) Limit or prevent destabilizing rent increases</li><li>Prioritize policies that create homeownership opportunities for BIPOC residents</li><li>More clearly define “low-income” to effectively serve populations</li><li>Draw out data on multigenerational households</li><li>Connect/lift-up how middle housing can provide flexibility for multigenerational households, that locating senior housing near low-income housing or childcare</li><li>Necessary to discuss housing for elderly and disabled residents</li></ul></div>	<div>New Strategies</div> <div><ul style="list-style-type: none"><li>Update appropriate policy language to include multigenerational families as priority populations</li><li>BIPOC ownership: Add disparate impact data/language to narrative and support in policy</li></ul></div> <div>Work Already Underway</div> <div><ul style="list-style-type: none"><li><i>Program</i> - DCHS is working with the Community Planning Workgroup (CPW) to develop recommendations for implementation for a potential King County Equitable Development Initiative (EDI). The CPW has identified an annual \$100 million need for possible EDI implementation.</li><li><i>Policy</i> – Existing support for equitable ownership opportunities in Skyway-West Hill &amp; North Highline subarea plans</li><li><i>Development Regulation</i> – Existing mandatory and voluntary Inclusionary Housing program in Skyway-West Hill &amp; North Highline</li></ul></div> <div>Current and Proposed Comprehensive Plan policies</div> <div><ul style="list-style-type: none"><li>King County shall prioritize funding for affordable housing projects that:<ul style="list-style-type: none"><li>Provide low-barrier housing designed to meet the needs of homeless households and other high-need households;</li><li>Provide accessible housing to people with behavioral health, cognitive, physical, or developmental disabilities;</li><li>Create homeownership opportunities for households at or below 80 percent area median income to build generational wealth and promote housing stability;</li><li>Are located near high-capacity transit to give residents access to job opportunities and services;</li><li>Are in areas with communities at risk of displacement and as shortage of affordable housing;</li><li>Reflect an equitable regional distribution of funding; and</li><li>Are inclusive community-driven projects developed and stewarded by and in collaboration with historically underserved communities facing displacement pressures and disparate health and economic outcomes.</li></ul></li><li>King County shall encourage the use of universal design in the development of affordable housing, family-sized housing, and market rate housing to create housing units that are accessible to seniors and people with disabilities.</li><li>King County shall support development of new affordable housing units that include a sufficient number of two-, three-, and four-bedroom units to meet space needs of anticipated households and to promote culturally relevant housing options.</li><li>King County shall take intentional actions that repair harms to Black, Indigenous, and People of Color households from past and current racially exclusive and discriminatory land use and housing practices that result in racially disparate impacts such as development patterns, disparate homeownership rates, disinvestment in lower-income communities, and infrastructure availability.</li><li>Density bonuses and other incentives for the development of affordable housing shall be available within unincorporated urban areas, with a focus on affordable rental and homeownership housing in commercial areas. Bonuses shall be periodically reviewed and updated, as needed, to ensure they are effective in creating affordable housing units, especially in coordination with any mandatory inclusionary housing requirements that may be adopted.</li><li>King County shall prioritize funding for affordable housing projects that:<ul style="list-style-type: none"><li>Provide low-barrier housing designed to meet the needs of homeless households and other high-need households;</li></ul></li></ul></div>



Themes from Equity Work Group	Executive Staff Response
	<ul style="list-style-type: none"><li>b. Provide accessible housing to people with behavioral health, cognitive, physical, or developmental disabilities;</li><li>c. Create homeownership opportunities for households at or below 80 percent area median income to build generational wealth and promote housing stability;</li><li>d. Are located near high-capacity transit to give residents access to job opportunities and services;</li><li>e. Are in areas with communities at risk of displacement and as shortage of affordable housing;</li><li>f. Reflect an equitable regional distribution of funding; and</li><li>g. Are inclusive community-driven projects developed and stewarded by and in collaboration with historically underserved communities facing displacement pressures and disparate health and economic outcomes.</li></ul> <ul style="list-style-type: none"><li>King County shall prioritize community-driven development of permanently affordable homeownership and rental projects led by community-based organizations and community land trusts.</li></ul>
<b>5 Non-land Use Tools</b> <ul style="list-style-type: none"><li>Support community-based organizations in developing capacity for working with developers</li><li>Advocate for policies that increase the housing supply at the state and federal level</li><li>Develop a fund that supports community care and solutions to homelessness and displacement</li><li>Create or facilitate an equity source that defers principal repayment as long as affordability levels are maintained and better yet increased with time</li></ul>	<b>New Strategies</b> <ul style="list-style-type: none"><li><i>Motion</i> – Advocate for adding requests for more funding and/or additional revenue authority for affordable housing to the state and federal legislative agendas<sup>177</sup></li></ul> <b>Current and Proposed Comprehensive Plan policies</b> <ul style="list-style-type: none"><li>King County shall prioritize funding for affordable housing projects that:<ul style="list-style-type: none"><li>a. Provide low-barrier housing designed to meet the needs of homeless households and other high-need households;</li><li>b. Provide accessible housing to people with behavioral health, cognitive, physical, or developmental disabilities;</li><li>c. Create homeownership opportunities for households at or below 80 percent area median income to build generational wealth and promote housing stability;</li><li>d. Are located near high-capacity transit to give residents access to job opportunities and services;</li><li>e. Are in areas with communities at risk of displacement and as shortage of affordable housing;</li><li>f. Reflect an equitable regional distribution of funding; and</li><li>g. Are inclusive community-driven projects developed and stewarded by and in collaboration with historically underserved communities facing displacement pressures and disparate health and economic outcomes.</li></ul></li><li>King County shall work with community members, cities, the private sector, and service providers to establish new, countywide funding sources, and urge the federal and state government to adopt new funding sources, for affordable housing development, acquisition, rehabilitation, preservation, and operating costs.</li><li>King County shall promote equitable outcomes in communities most impacted by racially exclusive and discriminatory land use and housing practices by supporting, in partnership with impacted communities, equitable access to resources, such as surplus properties and affordable housing financing.</li></ul>
<b>6 Preventing displacement of existing residents and businesses</b> <ul style="list-style-type: none"><li>Refer to “displacement” more broadly as “community displacement”</li><li>Refer to “thriving” communities rather than “healthy,” if “healthy” is used define it</li><li>Connect residential/business displacement more broadly as cultural displacement</li><li>Supporting housing co-ops as a community stabilizer</li><li>Prioritize requiring affordability within new developments</li><li>Emphasize stabilization of significant or legacy businesses</li><li>Require considering equity impacts upfront in implementing land use policy</li><li>Limit barriers to home-based and commercial childcare–Incentivize childcare centers in new housing developments, remove existing zoning/land use barriers</li></ul>	<b>New Strategies</b> <ul style="list-style-type: none"><li>Update polices to support equitable and community-driven development</li></ul> <b>Work already underway</b> <ul style="list-style-type: none"><li><i>Program</i> – Encourage and incentivize culturally relevant childcare programming to increase affordability and address childcare access deserts</li><li><i>Program</i> – Eviction database</li><li><i>Policy</i> – Existing anti-displacement policy framework in Skyway-West Hill &amp; North Highline subarea plans</li><li><i>Policy</i> – 2024 Comprehensive Plan proposal to incorporate an anti-displacement policy framework for all unincorporated areas</li></ul>

<sup>177</sup> The County's legislative agenda is a list of key issues that the County prioritizes in its work with the state and federal governments. There are separate state and federal legislative agendas, both of which are approved by motion annually by the King County Council.



Themes from Equity Work Group	Executive Staff Response
<ul style="list-style-type: none"><li>Expand rent caps and rental assistance programs to people with income above limits, but struggle with market rates</li></ul>	<ul style="list-style-type: none"><li><i>Development Regulation</i> – Existing mandatory and voluntary Inclusionary Housing and Community Preference program in Skyway-West Hill &amp; North Highline</li><li><i>Development Regulation</i> – 2024 Comprehensive Plan proposal to expand voluntary Inclusionary Housing program to all of urban unincorporated King County and the Vashon and Snoqualmie Pass Rural Towns</li></ul> <p><b>Current and Proposed Comprehensive Plan policies</b></p> <ul style="list-style-type: none"><li>King County shall take actions to prevent and mitigate residential and cultural displacement for unincorporated communities at risk of displacement to address racial disparities in housing and help protect cultural communities for Black, Indigenous, and People of Color by supporting cultural institutions, community hubs, and using community preference programs for affordable housing that helps people with a connection to the local community remain in or return to their community of choice.</li><li>King County policies, programs, and strategies shall recognize the role and importance of small and locally owned businesses in community stability and creating opportunity for Black, Indigenous, and People of Color (BIPOC); immigrants and refugees; the LGBTQIA+ community; women; and other historically underrepresented groups.</li><li>King County shall protect cultural resources, prevent their displacement, and promote expanded cultural opportunities for its residents and visitors in order to enhance the region's quality of life and economic vitality.</li><li>King County shall encourage and support community based and community led efforts to develop and retain existing small and local businesses and resilient communities. These efforts may include:<ul style="list-style-type: none"><li>Priority hire programs that create middle-wage employment in disadvantaged communities;</li><li>Ensuring public investment decisions protect culturally significant economic assets and community anchors; and</li><li>Engaging communities directly affected by economic development activities in planning, decision-making, and implementation.</li></ul></li><li>King County shall coordinate with a broad range of partners, organizations, businesses, and public sector agencies to support the development of business innovation districts and other community stabilization initiatives to help prevent the displacement of Black, Indigenous, and People of Color (BIPOC), immigrant and refugee, LGBTQIA+, and lower income communities.</li><li>King County shall prioritize funding for community and economic development projects that:<ul style="list-style-type: none"><li>Benefit households at or below 80 percent area median income;</li><li>Create equitable opportunities for economic prosperity, good health, safety, and connection to community;</li><li>Reflect an equitable regional distribution of funding; and</li><li>Meet the needs of historically underserved communities facing economic pressures and disparate health and economic outcomes.</li></ul></li><li>King County shall encourage the development of new housing models that are healthy and affordable by providing opportunities within the unincorporated urban area and near commercial areas. King County shall work to allow innovative housing projects to move forward, including affordable housing demonstration projects, community-driven development projects, affordable owner-built housing, land trusts and cooperative ownership structures for rental and ownership housing, co-housing, and other innovative developments.</li><li>Density bonuses and other incentives for the development of affordable housing shall be available within unincorporated urban areas, with a focus on affordable rental and homeownership housing in commercial areas. Bonuses shall be periodically reviewed and updated, as needed, to ensure they are effective in creating affordable housing units, especially in coordination with any mandatory inclusionary housing requirements that may be adopted.</li><li>King County should provide opportunities for incorporation of the principles of healthy communities and housing, climate resiliency, and sustainability into policy initiatives on housing, affordable housing, and community development in unincorporated areas.</li><li>King County shall actively promote and affirmatively further fair housing in unincorporated King County through its housing programs, and shall participate in efforts with its partners to further fair housing in its regional role promoting housing affordability and choice and access to opportunity for communities that experience disproportionate rates of housing discrimination and communities that bear the burdens from lack of investment and access to opportunity.</li><li>King County shall prohibit restrictive covenants or other land use, permitting, or property conditions that limit the ability of persons from protected classes (as defined in the King County Fair Housing Ordinance) to live in residences of their choice.</li><li>King County shall ensure that there is sufficient zoned capacity in the unincorporated urban areas zoned to accommodate King County's housing need allocations and provide a range of affordable, climate resilient housing types, including higher</li></ul>

Themes from Equity Work Group	Executive Staff Response
	<p>density single detached homes, duplexes, triplexes, fourplexes, townhouses, apartments, manufactured housing, cottage housing, accessory dwelling units, and mixed-use developments.</p> <ul style="list-style-type: none"><li>• King County shall support and implement programs and policies that increase housing stability and help to prevent and reduce homelessness, such as permanent supportive housing, emergency rental assistance, short-term rental assistance, diversion assistance, eviction prevention, and mortgage default and foreclosure counseling.</li><li>• King County shall support:<ul style="list-style-type: none"><li>a. Rental assistance, eviction prevention, and other programs that provide tenants with the resources and information to successfully navigate landlord-tenant disputes; and</li><li>b. Legislation that increases tenants' access to safe, affordable, healthy, and stable housing.</li></ul></li></ul>

# Appendices

## E. Equity Work Group Membership

Eric Alipio

Nimco Bulale

La Tanya VH DuBois

Everly Faleafine

Wanjiku Kahacho

Jill Kong

Spencer Lau

Steven Lewis

Sameth Mell

Whitney Nakamura

Dennis (Bao) Nguyen

Pah-tu Pitt

Gloria Ramirez

Tony To

Lalita Uppala

## F. Equity Impact Review of Plan Proposals Summary Tables

This section contains detailed summaries for each of the twelve scoping topics that formed the basis for the equity impact review of plan proposals. Each summary table includes the Executive staff's review and input from the Equity Work Group.

Scope Topic: General Planning - Implement Countywide Planning Policies
<b>People and Places Disproportionately Affected</b>
<ul style="list-style-type: none"> <li>• People at higher risk for displacement: Low-income households and BIPOC communities in urban unincorporated King County, specifically Black/African American, Asian, Hispanic/Latino/a/e population groups, particularly in North Highline, Skyway-West Hill, and East Federal Way; immigrants, and people with limited English proficiency</li> <li>• Sovereign Indian tribes have had marginal access or inclusion in past countywide planning efforts</li> </ul>
<b>Affected Determinants of Equity</b>
<ul style="list-style-type: none"> <li>• Housing</li> <li>• Healthy Built and Natural Environment</li> <li>• Jobs and Jobs Training</li> <li>• Transportation</li> <li>• Neighborhoods</li> <li>• Parks and Natural Resources</li> </ul>
<b>Related Proposals or Topics</b>
<ul style="list-style-type: none"> <li>• Comprehensive Housing Policy Review and Update</li> <li>• Expand Housing Options</li> <li>• Improve Affordable Housing Supply</li> <li>• Rural and Natural Resources Regulations</li> </ul>
<b>Unintended Consequences of Action</b>
<ul style="list-style-type: none"> <li>• Directing growth towards urban places can destabilize existing communities at risk for displacement</li> <li>• Affordable housing provision frequently depends on market rate growth, which is good for creating mixed-income communities, but growth can have a destabilizing effect</li> </ul>

**Scope Topic: General Planning - Implement Countywide Planning Policies**

- Annexation can be viewed as unloading underserved, diverse urban areas to cities

**Mitigating Actions and Strategies**

- Anti-Displacement strategies
- Inclusionary housing proposals
- Culturally relevant communications
- Equity impact reviews
- Power sharing and community role in decision making

**Equity Work Group Input**

- Mitigating proposals and strategies are insufficient in supporting existing communities, including growth, which has been entirely from BIPOC communities (on net).
- Voluntary inclusionary housing will not construct enough affordable units to meet need.
- There is no MFTE style program to incentivize private landowners to allow low-income or affordable rentals on their properties.
- There is not enough support in King County government at the moment to support entities to build 100% affordable developments in unincorporated King County.

**Measurement**

- Displacement risk
- Access to open space
- Housing Affordability
- Housing supply compared to growth

**Scope Topic: General Planning – Implement Subarea Planning Program**
**People and Places Disproportionately Affected**

- Affordable housing supply on Vashon-Maury Island and in the Snoqualmie Valley/Northeast King County is limited, disproportionately affecting low-income people and renters, who face higher levels of cost burden than county average
- Black/African American residents are more likely to be renters in these subareas
- Sovereign Indian tribes have been marginalized in past planning efforts

**Affected Determinants of Equity**

- Healthy Built and Natural Environment
- Neighborhoods
- Housing
- Parks and Natural Resources
- Community Economic Development

**Related Proposals or Topics**

- Expanding Housing Options
- Improve Affordable Housing Supply
- Implement Countywide Planning Policies
- Anti-displacement Strategies

**Unintended Consequences of Action**

- Delivery on Community Needs Lists is dependent on county funding
- Rural densities can prohibit more affordable housing types
- Changes in comprehensive planning schedule lead to a longer timeline for completing all subarea plans and a longer cadence between updates

**Mitigating Actions and Strategies**

- Community Needs Lists
- Culturally relevant communications
- Collaboration with cities and service providers
- Power sharing and community role in decision making

**Equity Work Group Input**

- Community needs lists and subarea planning outreach need to center the people who don't usually show up to virtual town halls.
- Community participation in subarea planning should be resourced to authentically engage with impacted communities.
- Need to implement tools to invest in existing communities that want to thrive in place and age in place.
- The costs of displacement are communities that lack small businesses and entrepreneurs that bring character, culture, and meaning.

**Scope Topic: General Planning – Implement Subarea Planning Program**

- Equity Work Group input about consideration of BIPOC communities and the erasure of Indian tribes within communities with limited populations of these residents was a learning moment for staff in understanding equity impacts.
- A 10 year schedule will give planners the time to be intentional about 1) Their outreach to communities that will be positively and adversely affected by changes, 2) Have culturally relevant and translation services available for outreach efforts with BIPOC communities, 3) Work off of a thoroughly compiled needs list that is reflective of the whole community in the subarea.

**Measurement**

- Displacement risk
- Access to open space
- Housing Affordability



## Scope Topic: General Planning – Rural and Natural Resources Regulations

### People and Places Disproportionately Affected

- By limited parks and open space access: urban unincorporated King County, Black/African American residents, Hispanic/Latino/a/e residents, and Native Hawaiian/Pacific Islander residents
- High agricultural land costs pose a barrier particularly for BIPOC and young or beginning farmers
- Proposals will aid salmon recovery, which is important for Indian tribes to fully exercise their sovereignty and associated treaty rights
- Proposals benefit the natural environment and working natural resource lands, upstream from most King County communities
- Limited affordable housing opportunity for low-income households and renters working in the rural area

### Affected Determinants of Equity

- Healthy Built and Natural Environment
- Housing
- Access to Parks and Natural Resources
- Food Systems
- Community Economic Development

### Related Proposals or Topics

- Implement Countywide Planning Policies
- Implement Clean Water Healthy Habitat Goals

### Unintended Consequences of Action

- Limiting growth in the rural area and on natural resource lands increases the value of urban land and housing costs
- Limiting mixed use development on commercially zoned rural parcels decreases housing capacity

### Mitigating Actions and Strategies

- Expanding Housing Options
- Improve Affordable Housing Supply
- Green Jobs Strategy

### Equity Work Group Input

- It is critical that adequate resources be apportioned to any planning and implementation efforts for community engagement and co-design and creation processes and not be in the marketing and outreach budgets by default.
- Equitable development and growth always come with unintended consequences. Thus the need to resource those most impacted to be at the table early and often.

**Scope Topic: General Planning – Rural and Natural Resources Regulations**

- The elimination of Urban Planned Developments and the disallowing of additional Mixed use neighborhood business and office zones in rural areas can have the unintended consequence of reducing the possibility to grow thriving communities in places that are not convenient to existing commercial centers that have staples such as daycares, grocery stores, health clinics, and community centers.

**Measurement**

- Access to open space
- Housing affordability

**Scope Topic: General Planning - Transportation****People and Places Disproportionately Affected**

- Places disproportionately affected by a lack of public transportation access: urban unincorporated King County
- People and places disproportionately affected by environmental pollution burden: BIPOC residents, low-income residents, unsheltered residents, urban unincorporated King County
- People disproportionately affected by transit policies: Transit-dependent populations, population with disabilities
- People disproportionately affected by traffic-related deaths and injury: American Indian/Alaska Native residents, Black/African American residents

**Affected Determinants of Equity**

- Transportation
- Healthy Built and Natural Environment

**Related Proposals or Topics**

- Implement Countywide Planning Policies
- Strategic Climate Action Plan Alignment

**Unintended Consequences of Action**

- Focus on non-automotive travel can appear as leaving out populations in areas where transit access does not exist or is very limited, or those who require a personal vehicle for travel
- Limited transportation funding sources to implement equitable service provision
- Actual or perception of gentrification risk from infrastructure investment

**Mitigating Actions and Strategies**

- Metro service guidelines prioritizing access for priority populations
- Prioritization of snow removal routes that serve transit-dependent populations
- Culturally relevant communications in public engagement
- Directing active transportation investments toward neighborhoods priority populations disproportionately reside
- Flexible transportation service programs for “last mile” travel where transit service is lacking

**Equity Work Group Input**

- Appreciation for the County’s recognition of the need to support travel that isn’t through driving and “complete streets.” By taking a more human-centered design and approach to planning “other-than-driving” modes of travel, these proposals can help facilitate the holistic growth and health of communities. More folks will be encouraged to walk on safer, unpolluted roads and develop a strong social

**Scope Topic: General Planning - Transportation**

infrastructure in the process. Leaning into public transit and infrastructure would benefit all.

- Supporting opportunities to travel through other modes than driving alone: it's not just access to economic opportunities (also cultural spaces, community, etc.).
- Priority interest in minority owned planning/design/construction companies that would respond to transit-related RFPs in neighborhoods/areas with large minoritized populations.
- "Culturally appropriate" information could be dispersed and workshopped directly with community orgs and businesses in the affected areas

**Measurement**

- Equitable access to transit
- Mode split, increasing use of alternatives to single occupant vehicle travel
- Environmental pollution burden
- Distribution of regional trails

**Scope Topic: Climate Change and Environment – Implement Clean Water, Healthy Habitat Goals**

**People and Places Disproportionately Affected**

- Proposals primarily benefit the natural environment, literally upstream from most King County communities
- Proposals will aid salmon recovery, which is important for Indian tribes to fully exercise their sovereignty and associated treaty rights
- People and places disproportionately affected by environmental pollution burden: BIPOC residents, low-income residents, unsheltered residents, urban unincorporated King County
- People and places disproportionately affected by limited parks and open space access: urban unincorporated King County, Black/African American residents, Hispanic/Latino/a/e residents, Native Hawaiian/Pacific Islander Residents

**Affected Determinants of Equity**

- Healthy Built and Natural Environment

**Related Proposals or Topics**

- Strategic Climate Action Plan Alignment

**Unintended Consequences of Action**

- Increased taxes, rates, fees to pay for program operation that may not be progressively applied
- “Green gentrification” from rising property values or perceived worth of new climate-friendly infrastructure investments
- Barriers to adoption for systemwide changes (e.g., vehicle electrification, renewable energy) could leave behind renters and low-income households with fewer resources or less autonomy in housing/transportation choices

**Mitigating Actions and Strategies**

- Land Conservation Initiative opportunity areas
- Stormwater Parks
- Green Jobs Strategy
- Anti-Displacement strategies
- Culturally relevant communications
- Climate preparedness focused on frontline communities

**Equity Work Group Input**

- While many impacts from these proposals affect the rural area, urban North Highline and Skyway-West Hill, which are on the Duwamish River and Lake Washington respectively. Portions of East Federal Way and East Renton are also adjacent to or include riverways. These clean water and flood planning proposals could also be applied to urban areas as well.

**Scope Topic: Climate Change and Environment – Implement Clean Water, Healthy Habitat Goals**

- Having the right to land or a garden in the place of residence is important for emotional health and a green space helps to keep the space cooler in addition to having plants cleans the air.
- Ensuring stormwater drainage in urban centers of UKC is able to handle one time devastating events that cost millions in damages and displace priority populations.
- More conversations are needed directly with the community with both youth, adults and seniors.

**Measurement**

- Environmental pollution burden
- Access to open space

## Scope Topic: Climate Change and Environment – Strategic Climate Action Plan Alignment

### People and Places Disproportionately Affected

- Climate change is a threat multiplier that exacerbates existing social and economic inequities driven by environmental injustice, institutional racism, and economic inequality. Disproportionately affected populations map to populations experiencing lack of access to amenities from historical disinvestment and opportunities to build intergenerational wealth, including places where BIPOC communities, households with low-incomes, and people with limited English proficiency disproportionately reside. Urban unincorporated King County, particularly North Highline, Skyway-West Hill, and East Federal Way specifically have greater representation of disproportionately affected populations.

### Affected Determinants of Equity

- Healthy Built and Natural Environment
- Access to Parks and Natural Resources

### Related Proposals or Topics

- Implement Clean Water Healthy Habitat Goals
- Implement Countywide Planning Policies
- Improve Health Equity Outcomes
- Increased tree canopy
- Wildland-urban interface proposals

### Unintended Consequences of Action

- Implementation necessitates additional communication and engagement with frontline communities
- Increased taxes, rates, fees, or costs of implementation may not be progressively applied
- “Green gentrification” from rising property values or perceived worth of new climate-friendly infrastructure investments
- Barriers to adoption for systemwide changes (e.g., vehicle electrification, renewable energy) could leave behind renters and low-income households with fewer resources or less autonomy in housing/transportation choices

### Mitigating Actions and Strategies

- Sustainable and Resourced Frontline Communities and Climate Equity proposals
- Green Jobs Strategy
- Cultural relevant communication proposals
- Wildfire Risk Reduction Strategy
- Heat pump pilot program

### Equity Work Group Input



### Scope Topic: Climate Change and Environment – Strategic Climate Action Plan Alignment

- Youth are a priority population. Schools and educational programs need investment to elevate a just transition from extractive economies and invest in regenerative processes.
- Equity comes in when we center marginalized voices, considering communities who often fall victims of unintended consequences due to economic stability and their inability to keep up with the environmental changes or advancement, like electrification.
- Unintended consequence of talking about transit-oriented development but not providing efficient and safe transit that goes to where people need to go. People drive cars because they don't have transportation choices that get them where they need to go in a reasonable time, especially for most people living in suburban and rural areas.
- Parking is important for many low-income and immigrant workers who drive for work or cannot access multiple jobs via transit.
- Need to work with city, state, and federal partners to repair, maintain, upgrade, and build infrastructure (red tape and delays) that will help to mitigate the effects of climate change in areas, especially those feeling effects from these one time events (ex. King tides in South Park).
- Places with identified past harms from highways or other forms of infrastructure and business have been built and negatively affect existing communities are opportunities.
- Electrification is important, but there needs to be acknowledgement that hybrid is a good alternative to all-electric vehicles as infrastructure at the moment does not have the capacity to have charging stations for everyone to have electric vehicles.
- There needs to be acknowledgement of preserving local food production and acknowledging there may be food insecurity as our environments become warmer, colder, or more weather volatile.

### Measurement

- Environmental pollution burden
- Tree canopy
- Access to open space and parks

**Scope Topic: Climate Change and Environment – Increase Land Conservation**
**People and Places Disproportionately Affected**

- By limited parks and open space access: urban unincorporated King County, Black/African American residents, Hispanic/Latino residents, Native Hawaiian/Pacific Islander Residents
- High agricultural land costs pose a barrier particularly for BIPOC and young or beginning farmers
- Proposals benefit the natural environment and working natural resource lands, upstream from most King County communities

**Affected Determinants of Equity**

- Healthy Built and Natural Environment
- Access to Parks and Natural Resources
- Strong and Vibrant Neighborhoods
- Community Economic Development

**Related Proposals or Topics**

- Strategic Climate Action Plan Alignment

**Unintended Consequences of Action**

- “Green gentrification” from rising property values or perceived worth of new park, open space, or trail investments

**Mitigating Actions and Strategies**

- Land Conservation Initiative opportunity areas for prioritizing open space investments and Conservation Futures funding
- Green Jobs Strategy

**Equity Work Group Input**

- Acknowledge Tribal and local BIPOC leadership should be acknowledged.
- Include support for career pathways for those that can't afford to volunteer.
- Prioritize local food production, preserve productive agriculture lands from development, and be aware that climate change will affect crop yields, not just access to agriculture lands. There may need to be access to programs that help compensate for losses if folks are not aware of or able to access Federal programs.
- A substantial share of population that works in agriculture are undocumented immigrants and the sensitivity that it takes to outreach with these communities is more important than sending out King County employees with logos and official vehicles.
- Landowner incentives should include an anti-displacement lens. Rebate programs should be responsive to all communities and other incentives should be used if certain demographics are not benefitting.

Scope Topic: Climate Change and Environment – Increase Land Conservation	
<ul style="list-style-type: none"><li>• Be aware of cultural differences and immigration status when performing outreach to priority populations.</li><li>• Urban unincorporated King County needs open space and greenery as much as we need to preserve old growth forests, agriculture lands, rural areas, and nature preserves.</li></ul>	
Measurement	
<ul style="list-style-type: none"><li>• Access to open space and parks</li><li>• Tree canopy</li></ul>	

## Scope Topic: Housing – Comprehensive Housing Policy Review

### People and Places Disproportionately Affected

- People disproportionately affected by cost burden: low-income residents that are more likely to be Black/African American residents, Hispanic/Latino/a/e residents, and American Indian/Alaska Native residents, renters
- Households who have disproportionately low rates of homeownership: Black/African American households and residents identifying as “a race not listed”

### Affected Determinants of Equity

- Housing
- Neighborhoods
- Healthy Built and Natural Environments

### Related Proposals or Topics

- Expand Housing Options
- Affordable Housing Supply
- Anti-Displacement Strategies
- Implement Countywide Planning Policies

### Unintended Consequences of Action

- Affordable construction mandates could have a chilling effect on development, and stall needed housing development, particularly affordable units, and investment
- Displacement risk from redevelopment
- Real or perceived gentrification risk from redevelopment or infrastructure investment

### Mitigating Actions and Strategies

- Anti-displacement proposals
- Tenant Protections
- Power sharing and community role in decision making
- Expanding housing options to build a greater variety of housing types
- Voluntary affordable housing incentives
- Community preference program

### Equity Work Group Input

- It would be helpful to show actual household incomes or type of jobs so it's more relatable to lay readers
- The needs for housing and jobs should be put into a context of enabling wealth and asset building for historically marginalized communities. Stable housing near jobs, good education and transit or transportation access, small business location in neighborhoods with strong markets, and access to healthcare are privileges that historically have aided the better off segments of our society. This Comprehensive

### Scope Topic: Housing – Comprehensive Housing Policy Review

Plan Update is being specific and explicit about equity so that historic disparities in asset creation can be offset with more intentional proposals.

- Lift up housing types or mixes that positively support intergenerational connections for household with extended families- e.g., locating senior housing near low-income housing/childcare or homeownership opportunities for larger or extended families.
- Zoning and building code requirements should not make home-based childcare more restricted or infeasible, to support immigrant households and culturally competent childcare needs.
- Community-based organizations collaborating with developers in housing development need support for capacity development so they can equitably engage with the developer. Often, the housing developer has much greater experience with projects financing and processes than the community-based organization partner. Ideally, the CBO can gain some form of tangible equity, like land or acquisition funding or predevelopment funding to bring to the table to be treated as a true real estate partner in addition to mission collaboration.

### Measurement

- Housing affordability
- Displacement risk
- Housing supply compared to growth

**Scope Topic: Housing – Improve Affordable Housing Supply****People and Places Disproportionately Affected**

- People disproportionately affected by cost burden: low-income renters that are more likely to be Black/African American residents, Hispanic/Latino/a/e residents, and American Indian/Alaska Native residents
- Places where most residents earn less than 80 percent of area median income including North Highline and Skyway-West Hill

**Affected Determinants of Equity**

- Housing
- Neighborhoods
- Healthy Built and Natural Environments

**Related Proposals or Topics**

- Expand Housing Options
- Affordable Housing Supply
- Anti-Displacement Strategies
- Improving Health Equity Outcomes

**Unintended Consequences of Action**

- Redevelopment can destabilize vulnerable communities and neighborhoods leading to displacement
- Increasing requirements on developers and development can have a chilling effect on development, preventing supply increases
- Affordable housing provision frequently depends on market rate growth, which is good for creating mixed-income communities, but can have a destabilizing effect

**Mitigating Actions and Strategies**

- Anti-displacement proposals
- Community preference program
- Power sharing and community role in decision making
- Expanding housing options to build a greater variety of housing types

**Equity Work Group Input**

- Overlap with other housing and anti-displacement topics

**Measurement**

- Housing affordability
- Displacement Risk

## Scope Topic: Housing – Expand Housing Options

### People and Places Disproportionately Affected

- People disproportionately affected by cost burden: low-income residents, particularly renters, that are more likely to be Black/African American residents, Hispanic/Latino/a/e residents, American Indian/Alaska Native residents
- Households who have disproportionately low rates of homeownership: Black/African American households and residents identifying as “a race not listed”

### Affected Determinants of Equity

- Housing
- Neighborhoods
- Healthy Built and Natural Environments

### Related Proposals or Topics

- Improve Affordable Housing Supply
- Anti-Displacement Strategies
- Improving Health Equity Outcomes

### Unintended Consequences of Action

- Redevelopment can destabilize vulnerable communities and neighborhoods leading to displacement

### Mitigating Actions and Strategies

- Anti-displacement proposals
- Community preference program
- Power sharing and community role in decision making
- Subarea plan community needs lists
- Priority Hire policies

### Equity Work Group Input

- Clearly define “low-income” for clarity to developers. Suggest relating low-income to the definition for free and reduced lunch.
- Prioritize homeownership for people of color

### Measurement

- Housing affordability
- Displacement Risk
- Housing supply compared to growth
- Homeownership rates



## Scope Topic: Pro-Equity – Anti-Displacement

### People and Places Disproportionately Affected

- Places disproportionately affected by displacement risk: North Highline, Skyway-West Hill. Moderate risk: East Federal Way, Fairwood and unincorporated Auburn, Enumclaw, Redmond, and Renton
- People disproportionately affected by cost burden: low-income residents that are more likely to be Black/African American residents, Hispanic/Latino/a/e residents, American Indian/Alaska Native residents, and renters

### Affected Determinants of Equity

- Housing
- Neighborhoods
- Healthy Built and Natural Environments

### Related Proposals or Topics

- Expand Housing Options
- Affordable Housing Supply
- Implement Subarea Planning Program

### Unintended Consequences of Action

- Over-correction in requiring affordable construction could have a chilling effect on development, and stall needed housing development, particularly affordable units, and investment
- Real or perceived gentrification risk from redevelopment or infrastructure investment

### Mitigating Actions and Strategies

- Public-private partnerships
- Power sharing and community role in decision making
- Subarea plan community needs lists
- Priority hire policies
- Cultural displacement policies

### Equity Work Group Input

- Concerning economic displacement of businesses, emphasize historically significant or legacy businesses where applicable.
- Proposals that promote large-scale development or attract big corporations could potentially disadvantage local small businesses, leading to closures and loss of community character.

### Measurement

- Housing Affordability

Scope Topic: Pro-Equity – Anti-Displacement	
	<ul style="list-style-type: none"><li>• Displacement Risk</li></ul>

## Scope Topic: Pro-Equity – Improve Health Equity Outcomes

### People and Places Disproportionately Affected

- By environmental health burdens: BIPOC residents, low-income residents, unsheltered residents, urban unincorporated King County
- By extreme heat and smoke: youth, older adults, outdoor workers, people with respiratory illness (including American Indian/Alaska Native residents, Multiracial residents), unsheltered residents, south King County and urban unincorporated King County
- By lack of restroom access: youth, older adults, families with children, low-income and unsheltered residents
- By limited parks and open space access: urban unincorporated King County, Black/African American residents, Hispanic/Latino/a/e residents, Native Hawaiian/Pacific Islander Residents
- By limited food access or food insecurity: youth, women, Black/African American residents, Hispanic/Latino/a/e residents, low-income residents, urban unincorporated King County

### Affected Determinants of Equity

- Healthy Built and Natural Environments
- Food Systems
- Health and Human Services
- Parks and Natural Resources

### Related Proposals or Topics

- Strategic Climate Action Plan Alignment
- Implement Countywide Planning Policies
- Increased tree canopy
- Wildland-urban interface proposals

### Unintended Consequences of Action

- Perception of “targeted universalism” as in conflict with population health, i.e., that focusing on interventions for the most burdened takes away from interventions for everyone
- Increased taxes, rates, fees for program operation that may not be progressively applied
- Perception of “green gentrification” from rising property values or perceived worth of new climate-friendly infrastructure investments
- Additional housing costs from improved amenities (e.g., air conditioning)

### Mitigating Actions and Strategies

- Upfront costs mitigate for downstream healthcare costs that are avoided
- Increasing housing supply near transit
- Heat pump grants
- Wildfire Risk Reduction Strategy

**Scope Topic: Pro-Equity – Improve Health Equity Outcomes**

- Land Conservation Initiative

**Equity Work Group Input**

- Health equity related topic descriptions and proposals could be better defined to build greater understanding.
- Engaging impacted communities and incorporating their perspectives and needs into decision-making can help to ensure that the benefits of the changes are equitably distributed and that any negative impacts are minimized.
- Proposals feel reactive and passive.
- Proposals that can balance for negative consequences: targeted workforce development, culturally responsive services, restorative justice and community healing initiatives, affordable and accessible childcare, and addressing biases and systemic discrimination.

**Measurement**

- Environmental pollution burden
- Access to open space and parks
- Food insecurity
- Access to healthy food retail
- Asthma among adults and youth
- Life expectancy

## G. Equity Work Group Priorities & Summary of Comments on Housing Proposals

The following two documents are intended to provide a snapshot of the Equity Work Group's priorities and perspectives on the 2024 Comprehensive Plan proposals.

- The first document – “Compilation of 2024 Comprehensive Plan Equity Work Group Priorities” – is from the Equity Work Group itself. It has been written and approved by the majority of Equity Work Group members and showcases the Work Group's priorities - based on input from learning sessions, guiding equity questions, and retreat consensus building activities.
- The second document, “Summary of Equity Work Group Comments on Housing Proposals” is a document that was written by King County staff that has been included as an attachment to the first document, at the request of Equity Work Group members. It is intended to provide additional nuance and depth to the first document by sharing direct comments from the Equity Work Group members on specific themes.

# Compilation of 2024 Comprehensive Plan Equity Work Group Priorities

Our hope for this Comprehensive Plan update is that the explicit focus on equity and repairing historic disparities and injustices will be met with intentional policies that create a more livable community for all. As current King County residents, we want the King County of 2044 to be a welcoming community where everyone can thrive – whether they are young or elderly; a current resident or a recent immigrant or refugee; a single-parent household or a multi-generational family. Given the time and capacity available for this process, the group focused on shaping 2024 Update proposals related to equity impact review, housing proposals, and public engagement strategies. We encourage continued development and engagement directly with equity and justice focused community groups and tribal nations.

## Priority considerations for all proposals

As King County continues to grow over the next twenty years, we envision a place where growth is placed in the context of enabling wealth- and asset-building for historically marginalized communities. Access to stable housing near career opportunities, good schools, transportation choices, thriving small businesses, and healthcare are not privileges for the few, but available to all.

We understand that equitable development and growth always come with unintended consequences to people and the environment. This is why it is critical to resource meaningful community engagement -- to make sure that those who are most impacted have the opportunity to be at the table early and often. Part of this includes sharing decision making and resources. Another part includes increased support for community-based knowledge and leadership of existing strategies and work -- for instance Black Lives Matter or Landback (in association with Missing and Murdered Indigenous Relatives) -- and reports or calls to action generated by community.

To help community members, decision makers, and County staff center equity and assess unintended consequences -- we designed a framework for reviewing equity impacts of Comprehensive Plan proposals. This reflects themes from our shared experiences with structural inequities, disparate impacts, affected communities, and inequitable outcomes resulting from previous long-range planning efforts.

Figure 1. Framework for considering equity implications



## Policy Priorities

The Comprehensive Plan and accompanying land use regulations create the foundation for producing and preserving affordable housing and thriving, equitable neighborhoods. The following priorities reflect what we see as core community needs and equity considerations.

<b>Increase the supply of affordable housing</b>	<ul style="list-style-type: none"> <li>• Prioritize requiring affordability in new development and anti-displacement for existing residents</li> <li>• Expand mandatory inclusionary housing</li> <li>• Support community preference and Multifamily Tax Exemption programs</li> <li>• Diversify housing options, including opportunities for those not typically served</li> </ul>
<b>Adjust for specific population needs</b>	<ul style="list-style-type: none"> <li>• Address the gap for households that do not qualify for subsidies but cannot afford market rate housing</li> <li>• Prioritize housing, services, and opportunities for the lowest income households, including stabilization and community cohesion to confront climate change and any inequities</li> <li>• Create homeownership opportunities for Black, Indigenous, and People of Color and community managed spaces</li> <li>• Support housing and services for the elderly residents and people with disabilities</li> <li>• Support multigenerational households through mixed use and middle housing development, including incentivizing ethical development that is responsive to and ideally led by the community</li> </ul>
<b>Prevent the displacement of existing communities</b>	<ul style="list-style-type: none"> <li>• Focus on cultural displacement, connecting the impact of residential and business displacement with a sense of belonging in neighborhoods, green spaces, and rural places</li> <li>• Protect tenants and residents from destabilizing rent, tax, and service increases; climate change; and other impacts. This includes job loss and other economic impacts through resourcing, living wages, support for community cohesion, and other strategies</li> <li>• Emphasize stabilization of significant or legacy businesses</li> <li>• Support housing co-ops as a community stabilizer</li> <li>• Incentivize renting accessory dwelling units and middle housing to lower income and households at-risk of displacement</li> </ul>
<b>Invest in data, engagement, and non-land-use tools</b>	<ul style="list-style-type: none"> <li>• Support community-based organizations in developing capacity for working with developers and implementing development</li> <li>• Outreach on affordable housing should be by and for community with an understanding of the history, direction, and community needs - including evaluation that centers the knowledge and experiences of the community</li> <li>• Analysis should not just focus on the majority or solely rely on numerical methodologies with understanding extended to all communities</li> <li>• Require support for meaningful engagement and address equity impacts in implementing land use policy</li> <li>• Advocate for policies that increase the housing supply at the state and federal level and compliance that is responsive to tenants and the community</li> <li>• Include support for community driven equity and justice including data sovereignty, community benefit agreements, and paid support in areas that matter to community, such as engaging with the environment or community-based solution generation</li> </ul>

## About

The 2024 Comprehensive Plan Equity Work Group has met roughly once every three weeks throughout late 2022 and 2023 to center community needs and interests in the Plan. The Work Group is comprised of 15 individuals representing organizations, communities, and places historically underrepresented in King County's comprehensive planning efforts.

Bao Nguyen  
Eric Alipio  
Everly Faleafine  
Gloria Ramirez  
Jill Kong

Lalita Uppala  
La Tanya VH DuBois  
Nimco Bulale  
Pah-tu Pitt  
Sameth Mell

Spencer Lau  
Steven Lewis  
Tony To  
Whitney Nakamura  
Wanjiku Kahacho







## Compilation of Equity Work Group Comments on Housing Proposals

The following table contains housing-related comments from the various Equity Work Group members from September 23, 2022, to July 17, 2023. There are three types of comments: 1) comments shared in post-meeting surveys, 2) comments shared as part of the Equity Analysis response for housing, and 3) paraphrased comments/questions shared during large group discussions in meetings.

A few things to note:

- Any written comment from an Equity Work Group member has been included verbatim (or with slight modifications to provide context – e.g. “Yes to question 1”). While each comment was assigned to a single section, repeated comments on the same subject have been included to show increased levels of interest/emphasis from the group.
- Paraphrased questions from the Equity Work Group also include paraphrased answers from staff in italics for reference

Comments are organized into 7 topic areas for ease of navigation: 1) connecting the dots, 2) displacement, 3) non-land use tools, 4) specific population needs, 5) middle housing, 6) inclusionary housing, and 7) data collection & community outreach.

Topic Area	Comments
 Connecting the dots	<b>GENERAL</b>
	Housing policy work should link to transit and job and services access (11/18/2022)
	Breaking down silos between programs that grow income and provide housing opportunity supports both aims. (12/09/2022)
 Displacement	“Great to see links to the ESJ Strategic Plan, Determinants of Equity Report, and Climate Resiliency Plan referenced.” (Equity Analysis Response)
	“The elimination of Urban Planned Developments and the disallowing of additional Mixed use neighborhood business and office zones in rural areas reduces the possibility to grow thriving communities in places that are not convenient to existing commercial centers that have staples such as daycares, grocery stores, health clinics, and community centers. These policies also encourage far commutes for folks that work in cities, especially if transit is inconvenient. Rural UKC should not have sprawling urban planned or mixed use developments, but disallowing these encourages suburban sprawl and reduces the amount of affordable housing for people who live in these communities already. Having these zones close to existing cities that have urban developments or mixed use neighborhoods is more common sense than taking these tools out of your tool box now and wishing you had them a few years from now.” (Equity Analysis Response)
	<b>EQUITY CONSIDERATIONS</b>
 Displacement	“Good to see connection between health disparities and location of where BIPOC communities reside.” (Equity Analysis Response)
	“Really appreciate connecting housing, historic harms, and equity in this section. Also listing the full range of housing affordability from very low to moderate incomes shows scope and scale of supply problem.” (Equity Analysis Response)
	“The needs for housing and jobs should be put into a context of enabling wealth and asset building for historically marginalized communities. Stable housing near jobs, good education and transit or transportation access, small business location in neighborhoods with strong markets, and access to healthcare are privileges that historically have aided the better off segments of our society. This Comp Plan Update is being specific and explicit about equity so that historic disparities in asset creation can be offset with more intentional policies.” (Equity Analysis Response)
 Displacement	<b>RESIDENTIAL DISPLACEMENT</b>
	Observing patterns of gentrification in the Black community, from Seattle to Puyallup, gentrification in Skyway – people have already been displaced, how can we provide the housing needed? (10/17/2022)
	Suggestion to refer to displacement more broadly as “community displacement” (10/17/2022)

Has there been any discussion about housing co-ops to prevent community dissolution? (12/09/2022) *This has been of interest in the past, but this is not a strategy KC has funded much in the past. There has been strong interest and encouragement of Community Land Trusts. Finance for co-ops is difficult, and they can become exclusive without public monitoring or structuring to prevent exclusivity.*

King County should prioritize requiring affordability within new development (1/20/2023)

#### **BUSINESS DISPLACEMENT**

"In response to economic displacement, King County should emphasize historically significant or legacy businesses where applicable." (Equity Analysis)

"In point 3 concerning economic displacement of businesses- perhaps emphasize historically significant or legacy businesses where applicable- e.g Earl's Barbershop in the CD in Seattle or the Salvadoran Bakery in White Center." (Equity Analysis)

"The Pro Equity and Anti-racist paragraphs in each section address my concern about unintended consequences of promoting growth in the unincorporated and PAA areas. Just hope the implementation phases will require equity consideration upfront and earlier in the process. That being said, we can't expect equity without growth." (Equity Analysis Response)

#### **CULTURAL DISPLACEMENT**

In addition to residential displacement, King County should consider ways to prevent cultural displacement (1/20/2023)

"One thing I'd like to explore in more detail is how to support actions to mitigate and prevent cultural displacement. In particular, we need to support culturally appropriate childcare. Many immigrant childcare providers have in-home childcare in their homes which is a source of income for the household and a much-needed culturally competent service to the respective communities. Zoning and building code requirements should not make this use more restricted or not feasible. I'm interested to explore what kind of incentives are available for having childcare centers on the ground floor of new housing developments." (Equity Analysis Response)

Cultural displacement is not discussed. What kind of growth is going to happen, who do you want to inhabit that area? There are residents currently here who want to thrive, don't drive them into pierce county. Open spaces are very important to communities and need to be preserved and businesses are going to go away. (3/22/2023)

#### **SUPPORTING EXISTING RESIDENTS**

The work is not moving as quickly as people are being moved due to displacement (3/3/2023)

Observation that County staff are taking time acknowledging what community is already aware of, and that the bigger question is "now what?" (10/17/2022)

How will the County invest in the unincorporated urban areas of King County? How will the County partner meaningfully and with honest intent on slowing displacement in unincorporated urban areas of King County and how will there be recognition that distinct communities already exist that need to be interacted with and nurtured? If folks (White or BIPOC) are displaced from unincorporated King County, where do they go, and is it more or less convenient to their places of business, worship, and activities of enjoyment? (12/13/2023)

Noticing people have already been displaced, how can needed housing be provided? (1/20/2023)

"The equity response does a good job about identifying 1) The priorities of King County to create a wealthier tax base in urban UKC by investing capital and changing zoning in these areas, 2) Which will have the "unintended consequence" of displacing the BIPOC communities attempting to thrive in place, 3) So a city will annex these areas to benefit the "wealthier and whiter" populations already residing in these areas to allow them to "thrive". (Equity Analysis Response)

"As written, the proposals do not equitably support existing communities to thrive. If population growth has been 100% from by BIPOC people, why are we not supporting BIPOC people? Why is it an unintended consequence that BIPOC people cannot live in urban UKC?" (Equity Analysis Response)

"Prefer using 'thriving' as opposed to 'healthy' - county gets to be the savior and our communities get to be disempowered. It means existing condition is unhealthy. I'm



Non-Land Use  
Tools

ambivalent because of gentrification and impact of marketplace on growth policies. Somewhere between prioritizing private investment and equitable policies. We need to be clear upfront that we need to have mitigation for market forces that we will not be able to control.” (3/3/2023)

#### **EVICITION/RENTAL DISCRIMINATION**

How is KC dealing with rental discrimination by race or credentials that may be burdensome for immigrants or refugees? (12/09/2022) A “fair housing” report (*Analysis of Impediments to Fair Housing Choice*) that is updated every five years is currently being updated. This is separate from the comprehensive plan update, but findings from the report do influence policy. King County tenant protection staff can be tapped for this group

It would be great to expand these kinds of programs (rent caps, assistance programs) to people with incomes above income limits but that still struggle to afford market rates. (12/09/2022)

“Please do update us on the “Analysis of Impediments to Fair Housing Choice” that was mentioned, and if possible bring on board some people that can speak about rental discrimination.” (12/13/2023)

Concerns re: eviction especially for fixed income households (10/17/2022)

Concerns of eviction especially for those on fixed incomes (1/20/2023)

#### **FUNDING/ADVOCACY**

Suggesting a fund for community care to prevent housing displacement and homelessness (11/18/2022)

“We cannot solve affordable housing locally through taxes; federal funds and advocacy are necessary. Advocate for policies that increase supply (by increasing density and allowed housing types)” (12/09/2022)

“I forget who said it, but there was a comment on federal and advocacy actions necessary to make meaningful change in our communities regarding inclusionary housing. I definitely agree with that sentiment and think that as much as King County can be doing with neighboring counties to garner federal support would be amazing. As we’ve all thought/mentioned before, we will probably be crossing this bridge again if we don’t make that meaningful change in our systems that we all hope to see – middle and inclusionary housing included.” (12/13/2023)

#### **COLLABORATION/PARTNERSHIPS**

“In terms of promoting collaboration and partnerships, it’s important to be explicit about “fair and equitable” agreements. Often times in mixed use development partnerships among non-profits, it is assumed that there is shared mission for the general good. Though this is true, often times the housing developer has much greater experience with project financing and processes than the community-based organizational partner. The CBO’s should be supported with capacity funding so they can equitably engage with the developer. Ideally, the CBO can gain some form of tangible equity, like land or acquisition funding or predevelopment funding to bring to the table to be treated as a true real estate partner in addition to mission collaboration.” (Equity Analysis Response)

#### **LOW-INCOME HOUSEHOLDS**

Need to prioritize incentivizing this group with developers

“Important to incentivize lower AMI affordable housing to developers” (10/17/2022)

King County should prioritize affordable housing for lowest income residents (1/20/2023)

“County staff have a lot of insight on which brackets of AMI need more assistance, but no policies or suggestions on how to address this. Incentives do not exist for developers and property managers to prioritize lower income AMI folks access to properties. Public funded housing scantily exists to address the housing need in the communities, especially where the market has dropped the ball.” (12/13/2023)

“For lower income levels, it can be extremely hard for families to continue renting a place after some time, are there policies put in place to prevent too high of renting price rises? I understand rent control is illegal in Washington, but it can be easy for landlords to have workarounds that raise prices unreasonably for families.” (12/13/2023)

Need to better define “low income” to more effectively serve this community



Specific  
population  
needs



Discussion on how the standard housing data indicators are not inclusive of other costs, do not include the felt reality or relative difficulty of living on a lower/fixed income (10/17/2022)

"The standard housing data indicators are not inclusive of other costs, do not include the felt reality or relative difficulty of living on a lower/fixed income" (1/20/2023)

The "low-income" aspect of "low-income housing" needs to be better defined. (1/20/2023)

"If developers are to implement low-income housing the definition of low income can be led by a personal interpretation. Therefore, low-income must be clearly defined. The failure to do so leads to continued displacement of minorities and low-income residents out of that city area. This should reflect the income of occupants pertaining to the free and reduced lunch definition of low income. To utilize the median income would not be equitable or fair to all residents." (Equity Analysis Response)

#### **MULTI-GENERATIONAL HOUSEHOLDS**

"Multigenerational households are represented in the data, but not often specifically pulled out. King County can take steps to draw out data on multigenerational families to ensure they're a part of our policy considerations." (12/09/2022)

"Noted a connection to missing middle housing forms that can be flexible or accommodating to multigenerational households" (12/09/2022)

"It would be good to mention housing types or mix that positively support intergenerational connections for household with extended families- eg. locating senior housing near low-income housing/childcare or homeownership opportunities for larger or extended families." (Equity Analysis Response)

"I want to lift up housing types or mixes that positively support intergenerational connections for household with extended families- eg. locating senior housing near low-income housing/childcare or homeownership opportunities for larger or extended families." (Equity Analysis Response)

#### **RENTERS/HOMEOWNERS**

Do affordable housing strategies include ownership opportunities and keeping people in their homes, and how rent control fits in? (12/09/2022) *Affordable housing strategies include both affordable rental and ownership strategies, anti-displacement strategies that are aimed at keeping people in their homes or neighborhoods, and repair grants/financing strategies to help keep people in their homes. Property tax exemptions also exist for some low-income households*

"The feedback on taking homeownership by People of Color is well taken." (Equity Analysis Response)

"Homeownership for people of color" (Equity Analysis Response)

#### **MISCELLANEOUS**

"It is necessary to focus more on rural areas for middle housing and salaries since they pay differently in each area and that means a decrease in income" (2/17/2023)

"It is still necessary to talk about housing for the elderly, housing for people with disabilities, land space in the house to have vegetal garden" (2/17/2023)

#### **GENERAL ELEMENTS**

"Thinking about ways to help folks caught between incomes too high for subsidized housing but that cannot afford market rate housing – missing middle housing posed as one solution" (10/17/2022)

"Supporting Duplexes/Triplexes and streamlining regulations. Building fitting into single family neighborhoods - That is not an important priority to me; increased housing is more important than "fit" in an area, 4. Elements that are important to me are access to nearby green/outdoor space and useful transit, and updates to infrastructure to increase pedestrian safety." (2/17/2023)

"Do you support more duplexes, triplexes and fourplexes? Yes! Do you support removing barriers to the development middle housing? Yes. Do you want these buildings to fit well



in single family neighborhoods? Yes. Are there any other elements we should consider as to create incentives for middling housing? Not yet" (2/17/2023)

"Duplexes/Triplexes definitely. Yes, it's critical that as we increase density that we maintain affordability across all market segments. There is no financial equity source to support development of middle housing. We need to create or facilitate equity source that defers principal repayment as long as affordability levels are maintained and better yet increased with time. Payoff principal at time of sale, refi, or restructuring of the property." (2/17/2023)

#### **EQUITY CONSIDERATIONS**

"They have all of the information and data and once again there are politics and policies that are not so equitable that they have to manage as well as trying to get on the right track. Despite missing middle housing not focusing on specifically lowest income households, there should still be incentives & policies put in place that can make it more affordable & easier for those populations to get housing as well, this can be in conjunction with other policies." (12/13/2023)

"Regarding missing middle, adding more structures to a property or ADUs should recognize that these solutions are less likely to generate income and address affordability as units for extended family or friends. Wonder if a strategy could be implemented to incentivize renting to lower income households" (12/09/2022)

"I appreciate how they highlighted it can increase units but not necessarily create affordable options/not reaching folks with low incomes" (12/13/2023)

"So long as we do not sugar coat that missing middle as is currently written only helps landowners then it is acceptable. Missing middle strategies will most likely allow landowners to house their family, friends, and close contacts. If we want to use missing middle strategies to help the housing issues that are present in King County, there needs to be an additional step for incentivizing private landowners to rent out additional space to folks in the community." (12/13/2023)

"Missing middle forms will be most helpful for multigenerational households that already own property vs. affordability for renters" (12/09/2022)

"In terms of generational wealth accumulation, a lack of home ownership is one of the (if not the) biggest hinderance for people. Creating and prioritizing middle housing is a step in the right direction. In addition to inclusionary housing, there could always be more pushes to create middle housing." (12/13/2023)

"Looks good to me. I worry about the displacement of renters in single family homes currently and where they will end up, especially in unincorporated areas. Will the creation of middle housing displace BIPOC families if they do not own their property? How are we ensuring that communities of color are not sold to developers and gentrified as people from out of state move in or cultural centers are removed?" (2/17/2023)

#### **INCENTIVE STRUCTURE**

King County should prioritize requiring affordability within new development (1/20/2023)

Bonus programs that increase over time - more bonus or deeper affordability? (1/20/2023)

"When speaking about development, incentives should be flipped, to incentivize developments that plan to house more lower AMI households than those in the 50%-80%+ ranges. Are we considering low-income/fixed-income housing policies for seniors and elders who need rentals?" (12/13/2023)

"How can we make sure that the incentive is high enough for developers to include enough affordable housing with new developments? What is considered a good threshold especially noting the limitations and challenges with the voluntary program?" (12/13/2023)

#### **MULTI-FAMILY TAX EXEMPTION (MFTE)**

Is there a way to provide higher affordability limit as MFTE is renewed? Thinking that as debt is financed over time, that presents an opportunity to increase affordability (12/09/2022) *KC does not have a MFTE program, but this is a helpful comment to guide the implementation of an MFTE program.*

"Do more discussion on potential policy options such as MFTE and incentive zoning with inclusionary zoning" (12/13/2023)



**MANDATORY INCLUSIONARY**

"The amount of developments or entities that will choose to voluntarily allow for inclusionary housing will probably be low. There is no MFTE style program to incentivize private land owners to allow low-income or affordable rentals on their properties. There is not enough support in King County government at the moment to assist to support entities to build 100% affordable developments in UKC." (Equity Analysis Response)

"I don't have anything to contribute more than what I shared in the meeting/breakout room, but a main observation and concern is the voluntary nature and no community preference feels risky, as many others have also expressed, as strong incentives and a mandatory component in more areas, and some sort of community preference consideration seems like a strategy to advance stability and affordability. Also if the previous residential incentive program was underutilized, and a recommendation from that code study includes mandatory IH, I'm curious how some of those study recommendations are or aren't chosen to move forward here." (2/17/2023)

"One thing that stood out to me was that inclusionary housing policies will include only a voluntary inclusionary housing option. I know we discussed this during our meeting and more specifically in our small groups, but what would it look like to explore making it mandatory? I also want to reiterate that the proposed inclusionary housing policies are strong and make big strides in terms of equity, but hope that we can see" (2/17/2023)

**COMMUNITY PREFERENCE**

"Having voluntary inclusionary housing is fine, forcing it without an MFTE infrastructure would be disastrous. Eliminating community preference altogether rubs salt in the wound for communities like Skyway and White Center who have faced displacement of BIPOC populations to South King County and Pierce County because housing is too expensive. Saying that Vashon Island doesn't qualify because there are too many retired white people living on the island says the Latinx population trying to survive doesn't matter. How will affordable housing stock created by inclusionary housing policies be tracked by King County so that these properties ensure long-term or perpetual affordable housing on site?" (2/17/2023)

"The proposals are comprehensive and inclusive of many solutions. 2. Where appropriate (places where existing residents face the high risk of displacement) preference policies should be included as part of the voluntary inclusive housing. Also coordinating with transit planning options to reconnect displaced households with transit to access jobs and services. 3. This is the first time that equity is being incorporated into the corpus of Comp Plan policies that I am aware of so its real progress. More resources to directly engage communities at the front end of future update processes is critical to sustain this effort. 4. They certainly are beginning to but more connections between housing, climate change/health, and transit would be helpful with future updates." (2/17/2023)

**DATA COLLECTION**

**Data  
Collection &  
Community  
Engagement**

Question whether KC tracks when developers choose not to build affordable housing, or do we track incentives that developers use. (12/09/2022) *KC tracks the use of developer incentives. A fee-in-lieu (for developers to pay into a fund instead of providing affordable units on site) will be going into effect in North Highline and Skyway as a part of recently adopted subarea plans. Determining that the fee is high enough is political and difficult to address through policy*

Who is being surveyed in the data county staff cite- does it include people with extremely low or no income? (12/09/2022) *Yes, the survey includes all households, though county staff share concerns about these groups' underrepresentation in the data.*

Is King County collecting stories from the community? (12/09/2022) *King County held a survey in September and October which collected lots of qualitative feedback and personal stories that we plan to include in policy making and represent in our equity analysis. We need to process the data and share it with King County staff. We plan to complete that in the first few months of 2023.*

Interest in community collecting data from community voices. (1/20/2023)

"Perhaps in section on AMI's, it would be helpful to show actual household incomes or type of jobs so it's more relatable to lay readers even though this is policy document" (Equity Analysis Response)

**COMMUNITY ENGAGEMENT**

Outreach about affordable housing by/for the people who benefit. (1/20/2023)



"The term "healthy" in second bullet needs to be defined or explained. First I think just introducing the concept and impacts of lack of accounting for equity or lack of it is a breakthrough and the first step to restructure how Comp Plans will be updated iteratively over time. A robust and resourced community engagement plan ahead of future updates is essential. The current process is rushed at best but understandable given fixed timeline. But this cannot continue into future updates without tokenizing the process. Kudos to the staff and Workgroup members for making things work with the cards we've all been dealt." (2/17/2023)

"Don't let the majority be the thing in trend analysis- also important to discuss multiple themes. Prioritize UKC comments- the pop the policies will affect" (3/3/2023)

Real engagement is in person- feeling heard, especially if community is speaking languages other than English (3/3/2023)

Displacement and housing struggles prevent people from engagement, especially folks who have previously been discriminated against. Displacement means is hard to find where people are (now) w/o community knowledge- hard to engage people who we can't find (3/3/2023)

"The diversity of KC is glaring in this section. It is critical that adequate resources be apportioned to any planning and implementation efforts for community engagement and co-design and creation processes and not be in the marketing and outreach budgets by default." (Equity Analysis Response)

"Hope the GMPC is equitably represented." (Equity Analysis Response)

"Good to identify GMPC in point 2. Need to get upstream as much as possible." (Equity Analysis Response)

"Yes, we need community participation in subarea planning, and we need to resource their participation so they can authentically engage with impacted communities." (Equity Analysis Response)

"Equitable development and growth always come with unintended consequences. There is the need to resource those most impacted to be at the table early and often." (Equity Analysis Response)