

Racial Equity Toolkit (RET) Summary Sheet: Cover Sheet and Questions

Department/Office: Seattle Public Utilities

Name of policy, program, etc. analyzed: Fats, Oils, and Grease (FOG) Program Restructure

Names and titles of key staff that led this RET process: Steve Hamai (Environmental Justice and Service Equity), Louise Kulzer (Source Control and Pollution Prevention Division Director)

Dates of RET process (e.g., 8/2015 – 10/2015): Jan/2015 – June 2015

***Please respond to the following questions on a separate document (no more than two pages).
Please include this page as the cover sheet along with your response.***

1. List the racial equity outcome(s) that you set in Step 1 of the RET process. (Max 300 characters)

The Fats, Oils, and Grease Program (FOG) is restructuring to more effectively and efficiently keep FOG out of the sewer system, reducing maintenance and pipe replacement costs and the risk of sewer back-ups into residences and commercial businesses. A more equitable outcome would be a program redesign that reduces the impact to all business customers, but especially low income customers of color, including smaller businesses owners.

2. Which stakeholders (groups and/or key individuals) did you engage in this RET? In what ways did you engage them? (Max 600 characters)

Staff conducted five interviews with small and medium sized business owners (Food Service Establishments – FSEs) to determine what assistance options they would find most helpful in meeting the FOG control requirements of the City. Public Health Environmental Health Division staff were also contacted to gather their perspectives on regulatory compliance and determine if there were collaborative efficiencies to be gained in kitchen inspections. SPU staff from different key internal business areas to participated on this team to share their knowledge and perspectives (e.g. Customer Programs, Sewer Rehab, Capacity Management and Operation Maintenance etc.)

3. Please describe up to five key benefits and/or burdens for people of color of this policy, program, project, or other decision, which the RET process helped you to identify or confirm. (Max 300 characters each)

- Awareness of FOG (and prevention measures) may be inequitable in their impact on businesses, leading to disparities adherence to regulatory compliance
- Some businesses contribute more FOG, impacting neighbors who are connected to the same sewer main
- Mandatory and immediate required installation and maintenance of grease interceptors may be unaffordable for some business and property owners
- A more gradual implementation of a FOG control solution helps keep FSEs thriving, still reduces impacts to the public wastewater system but more gradually, and helps keep future rate increases to a minimum

4. Please describe up to five key actions – things that you will do differently or begin to do now – of this policy, program, project, or other decision, which will increase opportunity and/or minimize harm for people of color. (Max 300 characters each)

The recommended change includes adjustments to reduce disproportionate impacts to small business owners.

- Focusing on more targeted situations for requiring full Code compliance for FOG control, including better plan review. These situations are:
 - new FSE startup
 - major remodel work at FSEs
 - FSEs contributing to sewer back ups
- Changing the FOG program focus from enforcing code to confirming code compliance
- Focus on improving plumber and design engineer’s knowledge of uniform plumbing code for grease interceptors so that correct control is established as part of business planning.

5. How will leadership ensure implementation of the actions described in question 4? (Max 800 characters)

The SPU Asset Management Committee (AMC) is expected to review and adopt the project team’s recommendation in early spring 2016. Their approval will provide direction to seek funding from the LOB. Major program changes post-AMC approval require reauthorization. The FOG Program is scheduled for AMC review in three years (regularly scheduled program review), and will include a report on program changes and expectation for future program development in keeping with the original direction set in the Stage gate process. A SPU Service Equity Subject Matter Expert will routinely be available as the implementation of FOG Program changes are carried out.

6. How have/will you report back to your stakeholders? (This includes the people who were directly engaged in this RET process, those who will be affected by decisions made, and other departments or divisions impacted by the RET findings and the actions described in question 4.) (Max 800 characters)

Re-engaging the FSEs that participated in original information gathering interviews will not be developed. Because the recommended alternative does not include broad (and immediately costly) actions to all FSEs, SPU will delay any communication with FSEs until the program is further developed.

7. What additional racial equity issues did this RET reveal? Consider how these unresolved issues present opportunities for structural transformation (i.e. working across departments, and with other institutions and sectors to achieve racial equity). (Max 800 characters)

- Future need/opportunity to collect select demographic data when building the database of FSE registrants (would help create a baseline profile, determine whether inequity was occurring, and determine the effectiveness of future actions) will be explored
- As research is done on FOG “hot spots” include diversity and economic characteristics to determine if hot spots affect this segment of the City disproportionately.
- Because multiple City and County departments interface with FSEs, there may be future opportunities to collectively go through a RET process (to possibly build a more holistic approach to FSE regulatory compliance and inspection, as well as conducting outreach and collecting information from these businesses).