



To: Council Member Rob Johnson, Chair, Select Committee for Mandatory Housing Affordability
From: Sara Maxana, Policy Advisor, Office of Mayor Jenny A. Durkan
Date: August 3, 2018
Re: How race and social justice were considered in the MHA program development

This memo provides background and timeline on how race and social justice were considered in the development of the Mandatory Housing Affordability (MHA) program—from the development of the Housing Affordability and Livability Agenda recommendations in 2014-2015 through the environmental review and legislative proposal in 2017-2018. The memo includes discussion of the Racial Equity Review of the *Draft* Environmental Impact Statement (EIS) and additional work to analyze and address racial equity impacts in the *Final* EIS. Key points include:

- MHA creates rent- and income-restricted housing that will help address the City's urgent affordable housing needs. Residential displacement has disproportionately impacted communities of color, while creating new affordable housing through programs such as MHA is a critical strategy to combat this displacement. Furthermore, affordable housing produced through City programs to date have benefited households of color, and it is expected that will continue under MHA.
- The MHA development process featured inclusive outreach to a broad range of traditionally under-represented communities, including low-income households, communities of color, and immigrant communities. The primary themes that emerged from this engagement included the need for more affordable housing and the desire to minimize and mitigate displacement of current residents. The preferred alternative responds directly to this engagement.
- The MHA EIS used the City's adopted Growth and Equity Analysis as the basis for the *Draft* EIS action alternatives and the *Final* EIS preferred alternative. By doing so, the City integrated a displacement risk lens to MHA that directly considers race as a key factor.
- The MHA Racial Equity Team was one of many individuals and organizations that commented on racial equity issues the *Draft* EIS. In response to these comments from community, the City strengthened the analysis of race and racial equity in the *Final* EIS. Although the City did not receive a formal comment letter on the *Draft* EIS from the MHA Racial Equity Team during the comment period, MHA program staff met with Team members to receive input and addressed their input in the *Final* EIS.
- The *Final* EIS's preferred alternative advances racial equity by focusing more intensive zoning changes in communities with high access to opportunity and low displacement risk—neighborhoods that have historically limited multi-family development and access for households of color. The preferred alternative focuses less intensive zoning changes in communities with high risk of displacement—which includes all neighborhoods with a percentage of minority residents higher than the Seattle average.

The memo concludes with how the City is applying lessons learned from the Racial Equity Review to new RSJI efforts underway and in the future.



Background and Timeline

The MHA program development process considered race and racial equity in several ways, including:

- Building on several large bodies of work that evaluated Seattle’s growth patterns, including implications by race and ethnicity;
- Using a racial equity lens in designing and carrying out community engagement;
- Integrating race and ethnicity directly into the creation of the *Draft* EIS Action Alternatives;
- Expanding on the analysis of racial equity and cultural displacement in the *Final* EIS; and
- Selecting a *Final* EIS Preferred Alternative that differentiates growth based, in large part, on displacement risk.

The following timeline provides detailed background on how race and racial equity shaped the MHA program, including the formal EIS process. While the City should always strive to do better to analyze and understand racial equity implications of policy choices, it is important to note and learn from the many ways in which the City led with racial equity in the development of the MHA proposal.

2015

HALA Recommendations. MHA emerged as the cornerstone recommendation of the Housing Affordability and Livability Agenda (HALA) Advisory Committee. In May 2015, an interdepartmental team of RSJI Change Team members conducted a Racial Equity Analysis on the full set of recommendations to help support the HALA Committee’s final work. That analysis identified the linkage fee proposal (that would later become MHA) as a means to generate new revenue for affordable housing development and increase housing opportunities for people of color.

2016

Community Engagement. The Department of Neighborhoods (DON), Office of Housing (OH), and Office of Planning and Community Development (OPCD) conducted nearly two years of community engagement to shape the MHA proposal. The community engagement process emphasized outreach to communities that have been traditionally underrepresented and underserved in City processes—particularly lower-income households and communities of color. The following list summarizes key engagement activities:

- Meeting community members where they already meet, such as Community Conversations at Seattle Goodwill, Ethiopian Community Center, New Holly, and Filipino Community Center—all with live translation into several languages. City staff worked with existing community-based organizations, such as Urban League and Latino Equity Network, to host lunches to discuss MHA. City staff worked with the Capitol Hill Renter’s Initiative to involve renters in MHA outreach.
- During the nine-month facilitated process that shaped MHA implementation principles, the City selected focus group members based on demographic factors (including race) and offered stipends, transportation assistance, and childcare to facilitate equitable participation. The City also contracted with community-based organization, Puget Sound Sage, to provide assistance to community members from traditionally under-represented groups to ensure that they had the support to fully participate in the meetings.
- The City translated key materials into both people-speak and into seven top-tier languages to make them more accessible to diverse community members. City staff worked with Community Liaisons to provide interpretation at many community meetings. The City also employed an ethnic media strategy to invite community to events.



The City provided translation into seven languages for a mailer sent to 88,000 households, and a translation and voice over for the HALA-related informational videos.

- In the door to door education efforts that targeted over 10,000 homes proposed for MHA rezones, the City hired culturally appropriate door knockers to focus on areas that were high-level Spanish, Mandarin, and Vietnamese speaking.
- The City relied on the DON Community Liaison Program to lead targeted and culturally-appropriate engagement activities with immigrant and refugee communities, communities of color, and low-income communities to gain community input on affordable housing needs and programs, including the Seattle Housing Levy and MHA.
- For additional information on how community engagement shaped the preferred alternative in the *Final EIS*, refer to [FEIS Appendix B: Summary of Community Input](#).

Key themes the City heard from community—particularly from engagement with communities of color and low-income households—were 1) the need to create more affordable housing throughout the city and 2) to minimize and mitigate displacement of Seattle residents as the city grows. The City responded directly to these themes in the *Draft EIS* action alternatives and the *Final EIS* preferred alternative.

Growth and Equity Analysis. OPCD published the [Seattle 2035 Growth and Equity Analysis](#) that analyzed impacts on displacement and opportunity related to Seattle’s Growth Strategy. The analysis relied on demographic data—including percentage of people of color and linguistic isolation—to develop a typology of Seattle’s neighborhoods based on displacement risk and access to opportunity. PolicyLink—a national research and action institute advancing racial and economic equity—served as a consultant to the Seattle 2035 Comprehensive Plan process and reviewed the methodology and findings of the Growth and Equity Analysis. The Growth and Equity Analysis equitable development typology became the fundamental framework for defining and differentiating the action alternatives in the MHA *Draft EIS*, and directly informed the preferred alternative in the *Final EIS*.

New MHA Requirements Matrix. The City announced a new expanded matrix for MHA requirements that calibrated the requirements based on both the market conditions of the geographic neighborhood (low, medium, and high), as well as the scale of the rezone proposed (M, M1, M2). The new matrix increased the range of performance requirements from 5-7% to 5-11%, with commensurate changes in associated payment amounts. With this action, the City also announced that any community at high risk of displacement in the Growth and Equity neighborhood typology, that also was on the cusp of two geographic areas, would be bumped to the higher of the two requirements. This effected higher MHA requirements for many communities at high risk of displacement, ensuring that as redevelopment occurs in those communities, it will make larger contributions to affordable housing.

2017

Fair Housing Assessment. The City published the [City of Seattle and Seattle Housing Authority Joint Assessment of Fair Housing](#). The assessment is Seattle’s most comprehensive and up-to-date evaluation of housing access and choices for protected classes, including race and national origin. The Assessment recommended citywide MHA implementation as a critical strategy to “promote equitable growth that harnesses new development to create diverse, affordable housing choices throughout the city,” and “preserve and increase affordable housing in communities where residents are at high risk of displacement.” The Citywide MHA *Final EIS* includes several analyses on growth and segregation directly from the Fair Housing Assessment.



Racial Equity Review. Former Mayor Murray issued a call to RSJI Change Team members across a dozen departments to participate in an interdepartmental Racial Equity Review of the MHA *Draft* EIS. Approximately 40 City employees volunteered for the MHA Racial Equity Team. They started a five-meeting process to draft a comment letter to the *Draft* EIS that would help inform additional analysis, identify mitigation measures, and advise the selection of a preferred alternative in the *Final* EIS.

Draft EIS. OPCD published the MHA *Draft* EIS on June 9. The *Draft* EIS used the 2016 Growth and Equity Analysis to allocate new development capacity differentially across neighborhoods based on displacement risk and access to opportunity. By using these indices as the foundation for the Action Alternatives, the Citywide MHA *Draft* EIS intentionally makes race an integral, rather than after-the-fact, consideration in evaluating alternative growth patterns.

Expanded analysis in Final EIS. The MHA staff team synthesized and responded to the 800+ comments received on the *Draft* EIS, conducted additional analysis, and selected a preferred alternative for the *Final* EIS. Several individuals and organizations—such as the Seattle Planning Commission, Puget Sound Sage, and Councilmember Herbold—provided formal comments on how the City could strengthen analysis of racial equity in the *Final* EIS. In addition, MHA program staff received some preliminary comments from, and met with several MHA Racial Equity Team members, including the Team’s co-leads, in order to incorporate their suggestions. Office of Housing change team members provided their feedback directly to the OH MHA staff so that the *Final* EIS could reflect their work.

In response to these comments from community members and organizations, the *Final* EIS included considerable additional analysis and discussion of racial equity and cultural displacement:

- The Housing and Socioeconomics chapter added a section on the historical context of racial segregation and included a qualitative discussion of cultural displacement.
- New demographic data on measures like housing cost burden and wealth was presented according to racial and ethnic categories to examine disparities by race.
- A correlation analysis explored the historical relationship in Seattle between housing development and changes in low-income populations and people of color.
- A preferred alternative that centers race by using the displacement risk index to differentiate amounts of new development capacity.
- An expanded consideration of zoning and non-zoning-based measures to mitigate residential and cultural displacement.

Preferred Alternative in Final EIS. Program staff from the Equitable Development Initiative helped shape how the preferred alternative considered displacement risk, as well as consulted on the specific zoning recommendations for neighborhoods at high risk of displacement—which includes *all* urban villages with a percentage of people of color that is above the Seattle average. The two highest priorities that shaped the preferred alternative were displacement risk and transit access. The preferred alternative furthered racial equity by:

- Directing more housing choices through more intensive zoning changes in communities with high access to opportunity and low risk of displacement—many of which are historically white communities with relatively less opportunities for multi-family housing. In many cases, a history of discriminatory land use practices, such as the use of racial covenants, have made these neighborhoods less accessible to communities of color. The Joint Assessment of Fair Housing (2017), which documented greater racial and ethnic integration in several of these



neighborhoods with the recent development of more multifamily housing, recommended MHA rezones as a strategy to increase housing choices in high access to opportunity communities.

- Directing less intensive changes to communities at high risk of displacement, which disproportionately includes communities of color. In these communities, new housing choices are critical to ensure that we are generating new affordable housing through MHA. However, if affordable housing choices are not able to keep pace with larger scale changes, current community members may experience greater displacement pressure as their communities change and grow. Less intensive changes in these communities ensure that market rate development will contribute to affordable housing—a key tool for addressing displacement—while reducing the relative scale of change to these high displacement risk communities.

Racial Equity Review Letter. Dan Nelson at SDCI, the staff lead for the MHA Racial Equity Team, submitted a formal letter on the Racial Equity Review of the *Draft* EIS to MHA program staff, former Mayor Burgess, and City Council, on behalf of the MHA Racial Equity Team. Although the letter was not received in time to be included in the formal *Final* EIS, the substance had been conveyed in previous staff check-in meetings and helped inform the additional analysis in the Final EIS. (See Attachment A for the Racial Equity Review cover letter and narrative.) Key take-aways from the letter include:

- The letter supported MHA implementation, but highlighted the need for better data to understand how communities of color are affected by displacement and housing affordability, and how tools such as MHA can help mitigate these impacts. The letter acknowledged that these data do not currently exist and called on the City to develop new data monitoring programs in conjunction with MHA implementation.
- The letter argued that the State Environmental Policy Act, which defines the parameters for EIS processes, does not provide the appropriate structure for evaluating racial equity impacts or benefits of policy proposals.
- The comments in the letter were based entirely on the *Draft* EIS, and therefore referenced neither the additional analyses and narratives related to racial equity in the *Final* EIS nor the preferred alternative that centered racial equity through its differentiation of neighborhoods based on displacement risk.
- The letter did not document how data on race and ethnicity were used to differentiate the action alternatives in the *Draft* EIS.
- The letter did not just focus on the narrow subject of the *Draft* EIS—the incremental new growth and affordability investments associated with MHA implementation—but offered critiques on the impacts of historical land use patterns and growth already underway.
- The letter did not recommend a preferred alternative but stated that implementing MHA through either of the action alternatives was preferred to the no-action alternative that would not implement MHA.
- The letter did not recommend mitigation measures but urged the City base future policies and programs on better data monitoring on the potential benefits and impacts to communities of color as Seattle changes and grows.
- The letter volunteered the ongoing efforts of MHA Racial Equity Team members to support expanded data collection and monitoring and other measures related to MHA implementation.
- The letter emphasized the importance of deliberate and early RSJ work to inform efforts such as MHA and suggested that formal Racial Equity Toolkits be used.

MHA staff lead, Sara Maxana, responded to Dan Nelson with a letter and attachments to document how racial equity was considered in both the *Draft* and *Final* EIS processes, including the community engagement process that focused on under-represented and under-served communities and the selection of the preferred alternative that furthers racial

equity through its consideration of displacement risk. The letter also outlined opportunities for the MHA Racial Equity Team members to be engaged in MHA implementation and data monitoring moving forward. (See attachment B for the response letter and attachments.)

2018

Council Process and EIS Appeal. In late 2017, OPCD published the *Final* EIS and former Mayor Burgess transmitted the legislation to implement the preferred alternative to City Council. Several neighborhood organizations appealed the adequacy of the *Final* EIS to the City’s Hearing Examiner. The appeal process includes hearings in Summer 2018 and will conclude with a Hearing Examiner decision in early Fall 2018. Meanwhile, the City Council began their legislative process to consider the citywide MHA implementation legislation in January 2018. City Council may not take any action on the legislation until the appeal process is resolved.

Lessons Learned and Next Steps

The MHA experience underscored the importance of integrating RSJI work early in the policy development process and ensuring that RSJI processes are well resourced and supported to ensure successful outcomes. The following section highlights several concrete steps the City is taking to apply these lessons learned to improve and expand our RSJI work.

Strengthening internal structure and accountability for the Race and Social Justice Initiative. On her first day of office, Mayor Durkan signed Executive Order 2017-13 calling on the City to complete an internal review of RSJI efforts and develop recommendations to embed RSJI into department’s programmatic work and strengthen how the City responds to community engagement. The Seattle Office of Civil Rights has completed its internal assessment and recommendations are currently under review. An action plan with immediate and medium-term measures will be issued this Fall.

Improving data collection and monitoring on displacement, housing affordability, and equitable development. The Racial Equity Review letter emphasized the need for better data collection and monitoring to understand the benefits and impacts to communities of color as the City implements programs such as MHA. The MHA staff team response letter elevated the *Equitable Development Monitoring Program* as an opportunity for the MHA Racial Equity Team members to help enhance and shape the types of data the City will be monitoring. The Equitable Development Monitoring Program will include metrics to gauge progress over time in achieving outcomes that benefit people of color as well as a specialized set of metrics designed to provide early warning signals of heightened displacement risk. The Program is conducting a formal Racial Equity Toolkit. OPCD program staff are working across departments, and with assistance of RSJI Change Team members, to design the community engagement process. The Program’s first report is expected by early 2019.

Conducting a formal Racial Equity Toolkit in tandem with an EIS process. Councilmember O’Brien’s office, with support from department staff, are currently completing a Racial Equity Toolkit in tandem with the Accessory Dwelling Unit (ADU) EIS. This will mark the first time the City is completing a formal Toolkit engagement process to inform an EIS. The staff team are partnering with RSJI Change Team members to design and carry out the Toolkit process and working with community-based organizations to inform the engagement process. The scope of the Toolkit will go beyond the regulatory changes considered in the EIS and may help shape mitigation measures to ensure that communities of color benefit from opportunities to build more ADUs in Seattle’s single-family neighborhoods.



Complementing MHA implementation with additional measures to minimize and mitigate residential and cultural displacement. Throughout the three-year MHA program development and community engagement process, the City heard from community members and community-based organizations about their concerns regarding displacement of communities of color and low-income families throughout the City, as well as other issues related to growth and livability as Seattle changes. The City has many programs and initiatives underway, and could consider others to complement MHA implementation, that would address these community concerns. Specific efforts to advance racial equity could include investments in community-based solutions to displacement through the Equitable Development Initiative, as well as improvements to data collection to understand racial implications of growth and change, provisions to strengthen tenant protections, implementation of the Equity & Environment Agenda, and strategies to minimize displacement of low-income renters and homeowners.

Conclusion

MHA creates rent- and income-restricted housing that will help address the City's urgent affordable housing crisis—a crisis that disproportionately impacts communities of color and low-income households struggling to remain in Seattle. As multi-family and commercial development continues throughout Seattle neighborhoods, every day of delay in citywide MHA implementation means more lost opportunity to create the rent- and income-restricted housing that Seattle needs to address its affordability needs and mitigate the displacement of people who call Seattle home.

Attachments

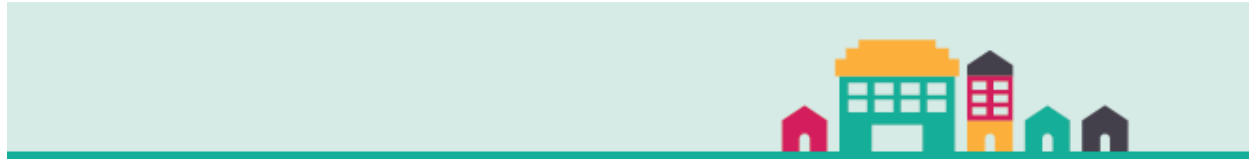
Attachment A: MHA Draft EIS Racial Equity Review materials, November 2017

Attachment B: MHA Draft EIS Racial Equity Review response materials, December 2017

Mandatory Housing Affordability (MHA) Draft Environmental Impact Statement (DEIS)

Racial Equity Review materials, November 2017

- “MHA EIS Racial Equity Review Summary.” Dan Nelson, on behalf of the MHA DEIS Racial Equity Review Team. November 17, 2017. (3 pages)
- “MHA EIS Racial Equity Review Narrative.” Dan Nelson, on behalf of the MHA DEIS Racial Equity Review Team. November 17, 2017. (7 pages)



MHA EIS Racial Equity Review – Summary Page

Purpose:

This document summarizes comments from an interdepartmental team formed in response to City Council’s question "***Is racial equity being considered in the development of MHA EIS?***" The team was composed of Subject Matter Experts (SMEs) from various City departments. Many of the SMEs have also been trained extensively through the City’s Race and Social Justice programs.

Focus:

The team was formed when there was 4-6 weeks left in the public comment period. The City typically uses a Racial Equity Toolkit to examine changes to programs, processes requirements. The toolkit should be applied in advance of proposed changes and it can take months to conduct an adequate analysis.

Since the team was tasked with commenting on a document that was already drafted, and since the public comment period was so short, we opted to take a focused “review” approach on the draft, rather than attempting to apply the Equity Toolkit to the existing document.

Our work therefore focused on three questions:

1. ***Is it clear that racial equity was considered in the development of the chapters? Yes or no.***
2. ***Is there an impact on racial equity based on the alternatives? Positive or negative?***
3. ***What recommendations do we have for mitigation of negative racial equity impact based on the three alternatives?***

Please find our comments and racial equity recommendations for MHA and the MHA EIS attached for your consideration.

What We Found:

In response to questions 1 (*Is it clear that racial equity was considered?*) and 2 (*Is there an impact on racial equity based on the alternative?*) Our group observed that:

- MHA has done a good job of addressing affordability, but EIS doesn’t consistently analyze racial equity impacts across the chapters.
- The EIS does not seem to consider race in the impacts or mitigation.

- The City of Seattle has measured racial equity indicators for a short time, and we don't have enough information to determine how changes to zoning and other requirements impact communities of color.
- The Growth and Equity analysis is the only place race was clearly considered:
 - The Growth and Equity analysis lists many of the historic reasons we are in the predicament we find ourselves in today.
 - The attempt at quantifying action based on the low and high risk of displacement and access to opportunity seems to be a step in the right direction, but it is a high-level approach.
- The EIS chapters don't seem to take the high-level work of the Growth and Equity analysis to a more granular detail. The EIS chapters often don't show how mitigation of inequitable impacts would be handled.

Racial Equity Recommendations for MHA:

Our team's recommended actions are:

- **Include additional racial equity analysis before taking MHA action. Create an MHA Race and Social Justice Team to assist with this work before and after MHA implementation.**
 - The type of information needed to demonstrate specific racial impacts of MHA in the EIS was lacking. The EIS was unclear about which racial equity outcomes were being addressed or which would be improved by MHA or the EIS.
 - We suggest the City Council authorize funding to create an interdepartmental team of SMEs who are trained in race and social justice. The team will be tasked with:
 - i. Gathering better information to measure racial equity impacts and identify whether existing programs and policies provide equitable mitigation.
 - ii. Identifying impacts and recommending strategies to use in implementing MHA: a problem-solving approach that leads with race.
 - iii. Working with communities to understand MHA outcomes after implementation, and identifying potential solutions
- **Engage communities of color in a discussion to identify what is crucial for that community's immediate and long-term success in the City of Seattle.**
 - Racial equity outcomes really couldn't be considered based on data alone, and certainly not on the data we currently have.
 - Communities of color need to be involved in the discussion of what places and programs are critical to their survival.
 - The City of Seattle government and the impacted communities need to answer the question: "To consistently provide racially equitable outcomes, what do we measure and how do we measure it?"

- **Identify and expand existing resources to inform MHA impacts, and make MHA adjustments as needed following implementation.**
 - Clarify measures: establish what information the City of Seattle will use and how we will adjust as we better understand MHA impacts on people of color living in our communities.
 - Consider studies done by various city departments that were not originally included in MHA and the EIS, which have begun to consider racial equity. Some are outlined by our team in their summaries.
 - Establish and maintain a community-lead reporting mechanism to inform a nimble real-time reaction to development and displacement as a means of mitigation.
 - Use the MHA Race and Social Justice team to help inform adjustments to MHA after implementation.

We suggest taking the MHA effort as it was originally intended -- to produce mandatory housing affordability -- and add to that *intentionally* seeking out areas where racial disparity can be addressed, and *intentionally* defining what information is missing to inform us as MHA proceeds, and then apply our findings as MHA is rolled out. If we do this, we can change outcomes and react to outcomes more effectively.

But there is more to our findings than listed above. There is a narrative of what we found was missing as we reviewed the EIS. We discovered a need to change the way we approach the work of RSJI, and invite you to read the attached paper and individual chapter findings based on the questions listed at the beginning of this document.

MHA EIS Racial Equity Review Team
11/17/17



MHA EIS Racial Equity Review

Please find our comments on the Racial Equity review of the draft MHA EIS below for your consideration. While our group specifically reviewed the EIS, we couldn't avoid how it informed the larger MHA, and so you will note our responses often refer to both.

The MHA and its EIS was, and continues to be, a challenging project for OPCD, and all departments involved; even without racial equity as a component there was a lot to consider. Our group found the MHA did a good job of addressing affordability, and the EIS touched on the many parts that make up our city and influence the lives of our residents from many important perspectives. But when we look at it from the perspective of racial equity, we found that there was no consistency of consideration regarding race across chapters. The Growth and Equity analysis is the only place race was clearly considered; in defining and addressing what the vision of equitable development is, as well as outlining a framework to address what racial equity would entail, it touches on many of the historic reasons we are in the predicament we find ourselves in today. Its attempt at quantifying action based on the low and high risk of displacement and access to opportunity seems to be the right direction. But it is a high-level approach, and makes it seem the chapters job would be filling out the details not covered in the Growth and Equity analysis.

For many of the EIS chapters it isn't clear racial equity was considered, and when it appears to have been considered, how it was considered was often contested by our group. In general, the EIS chapters don't seem to take the high-level work of the Growth and Equity analysis to a more granular detail, and show us how mitigation of inequitable impacts would be handled as it relates to the MHA and EIS chapters, and how to proceed with action associated with MHA.

Most of the group found that while the "no action" alternative was not an option, neither of the remaining 2 alternatives was a clear stand out choice, and a combination of alternatives was better for some elements over others. As a result, there was no cumulative group recommendation based on the 3 alternatives, but there are several chapter-specific recommendations we hope will be helpful.

Over all the biggest problem we found was that information, more specifically the type of information needed to demonstrate race was considered in the development of MHA and the EIS, was lacking. We couldn't tell what racial equity outcomes were being addressed or which would be improved by MHA or the EIS. Because of this, our recommendation is not one of mitigation, but of further action to be taken; action that will lead to gathering the information that is missing, that will inform our strategy and help develop an equitable problem-solving approach that leads with race. This approach should be used as MHA adjusts to the inevitable challenges it will face as outcomes unfold. Any action taken should be informed by subject matter experts in the various fields associated with this EIS; subject matter experts who will be, we recommend, continuously educated by exposure to the MHA's effect on racial equity

outcomes in real time, by the latest in racial equity work as provided by RSJI, outside experts, and the community feedback necessary to do work of this nature -- work that has never been attempted before.

Our recommendation would be not to go back and rewrite MHA, but to proceed with MHA generally as is, under the original intent of addressing affordability, and to intentionally include racial equity in the problem-solving approaches developed as MHA proceeds.

How the racial equity review came to be

This group formed as a response to council's question "Is racial equity being considered in the development of the MHA EIS?" It was not clear a toolkit or other such review had been done as it was being conceived and assembled, so we came together to perform a review of the EIS during the public comment period. The public comment period was to be only 4-6 weeks, and this was the principal reason we chose to do a "review" instead of a formal toolkit -- a toolkit on a program and document of this size and nature would take several months to complete.

The Mayor's office sent an email to city directors, asking to help us staff our group with people involved in the creation of the EIS, and who also had RSJI experience. The group first met to discuss scope and set our working schedule. We originally had hoped to produce a plain language version of the document for review by the public, but in the interest of time we set that aside and focused instead on 3 main questions:

- Is it clear that racial equity was considered in the development of the chapters? Yes or no.***
- Is there an impact on racial equity based on the alternatives? Positive or negative?***
- What recommendations do we have for mitigation of negative racial equity impact based on the three alternatives?***

We had 4 meetings over 4 weeks, and the attached summaries of the 3 questions asked is what the team produced in their separate teams.

What we found

Looking at the work as it approaches housing affordability, it is clear the MHA and EIS do a good job of addressing the various perspectives and considerations. But it appears to us, when looking at it from the perspective of race, it did not consider race as deeply. In our discussions it came down to the data, both the lack thereof and the type of data. The city has been looking at data, like housing tenancy and household income for example, for years and it has told us a great deal. But we have only been looking for true racial equity indicators in the form of data for a short time. There are no absolutely accurate indicators available now, in any of the subjects of the EIS, that can tell us how people of color are affected or will be affected by the proposals of MHA. The only real reason we know displacement has occurred is by looking around and seeing it, and hearing about it from those effected. Any data that could tell us what we needed to know wasn't available before displacement happened, and there would be very little if any of it available now to make the same determination.

What information would tell us what we need to know? For example, how could we have known that African Americans were being displaced from the Central district circa 1990 to 2010? But to be preventative, we would have needed it as close to real time -- as it was occurring -- as possible. We

would need to know not only peoples race, but where they live, when they moved there, how much they paid, how much they earn, when they moved away and where, and most importantly why. Was that type of information available then? Even today this information is not really available; we can only make assumptions. Landlords don't write down race on renter information. The DMV doesn't include race on our driver's licenses. While it is tracked in census data, we must make assumptions on demographics and location at a block by block neighborhood level. Also, census information is usually old, at least for our purposes, by the time we get it. As a result, it is difficult to track race. It is tracked in a very broad way, and analyzed with a very broad brush. There is of course an argument against tracking racial data, but that is a big conversation, and for another time.

How could we have known that displacement was taking place? For example, when did the displacement in the Central District actually start? Was it when white people started buying houses in the central district? There have always been white people living in the CD, more in recent years of course. Was it when developers started tearing down century old homes and building 2, 3 and 4 houses per lot? There are certainly more of them now, but again, some version of this has occurred for some time. So, what was it? When did it start? There is no clear answer. We don't know if it was a singular cause, or many. We can see it happened, in hindsight. We don't know truly if it was a choice or an unintended consequence.

I would like to editorialize here for a moment, and say that some in the black community of the CD see things like the federal drug and violent crime program called "Weed and Seed" back in the 1990's as arguably kickstarting displacement in the central area. The City of Seattle was one of 2 cities chosen to receive further funding to implement the next phase of the project. The "Weed" part convicted people, mostly black males, of drug crimes or violent offenses, thus removing them from the community. The "Seed" part, bringing in the community services, didn't do enough to improve conditions and the whole program made the situation worse by creating many broken families, and condemning a generation of black men to permanent second class status, or worse. Once out of prison, they had difficulty obtaining work or housing due to the conviction on their record, which compounds problems for a lifetime. People on the margins have little choice, and as prices increase those choices become fewer.

There is no information tracking how many families left the CD, where they lived after, when they were forced to move away and where, or why. This is the information we would need to be able to tell what was happening, and to be able to do something about it at the time. No one is arguing that something needed to be done about the drugs and violent crime back then, but the long-term consequences were destructive for the Black community in the CD.

And for those who lived there, displacement certainly didn't seem like an unintended consequence.

What to recommend

The majority of the racial equity review group acknowledged that racial equity outcomes really couldn't be considered based on data alone, and certainly not on the data we currently have. No one could have done it based on what we have, so there is no blame being insinuated here.

Learning this, we realized there was no real way for us to recommend mitigation of racial inequity. But it is also clear that without mitigation we risk repeating the mistakes of the past, mistakes which resulted in the loss of historic assets and communities such as in the Central District. We know that the CD has changed because we can see it.

The group came to realize that data and statistics are not all that is needed. There are important parts of our communities that cannot easily be quantified. For example, Chapter 3.5 Historic resources. For this section, it was clear there was little information (when compared to other sections such as land use or transportation), and no information that provided a window into racial equity considerations. However, during the review within our group, it was clear historic resources and cultural assets are the most *moving* elements, and great discussion took place. People's connection with place and space is based in the heart, and frankly cannot be measured unless people are asked about it. We as a municipality can unknowingly do harm if, for example, plans to remove a building do not consider the history and significance to neighborhoods and communities around it. By removing what a community views as cultural anchors, the loss of history and sense of place also feeds displacement. This is acknowledged in the growth and equity analysis, but again, not taken to granularity within the chapters where we could consider the effects and work for better outcomes.

It seems we have been using quantitative information to build the MHA, which can be useful if it is showing us what we need to know, and for housing affordability it does this. But we don't have the right information to consider racial equity. It seems qualitative information is missing to illustrate past racial equity outcomes and inform upcoming action. But how can we get that information?

It is our recommendation that we answer this question: "To consistently provide racially equitable outcomes, what do we measure and how do we measure it?" Unless we change how we gather our data – both quantitative and qualitative: facts, figures, and community story – and unless we change how we measure our effects on communities of color, no amount of information as we currently collect it will ever inform us in ways that can prevent racial inequity.

What to do

It does not make sense to go back to the drawing board with the MHA work. We shared our findings with OPCD as we proceeded with the review, and it is worth noting OPCD and other departments are taking heed of our findings, as well as the findings of other groups and council members during the public comment period, and improving their narrative and clarification of history, context, and outcomes. We look forward to seeing these revisions.

We feel if we take the MHA effort as it was originally intended -- to produce mandatory housing affordability -- and add to that *intentionally* seeking out areas where racial disparity can be addressed, and *intentionally* define what information is missing to inform us as MHA proceeds, and then apply our findings as MHA is rolled out, we can both change outcomes and react to outcomes more effectively.

Consideration of forming an MHA RSJ Team to spearhead that effort, to develop a methodology of how we measure our outcomes and monitor them, echoing the 2035 comprehensive plans mandate of measuring racial equity outcomes, is what is being recommended.

We recommend the following:

- Clarify measures: establish what we will use and how we will adjust as information is collected to better understand outcomes of MHA on people of color living in our communities. Consider studies done by various city departments that were not originally included in MHA and the EIS, which have begun to consider racial equity. Some are outlined by our team in their summaries.
- Establish and maintain a community-lead reporting mechanism to inform a nimble real-time reaction to development and displacement as a means of mitigation.
- Engage a permanent interdepartmental team of RSJ and discipline specific subject matter experts to work with communities on MHA outcomes and responses as they are revealed.

It is not being suggested the team and these points be added directly into MHA, but rather they be included as a companion resolution. They need to stand on their own and support the work of housing affordability in the open as a clear mechanism for racial equity.

On a larger scale, to move our city's thinking toward asking better questions to improve outcomes and solutions, and leading with racial equity in our problem-solving approaches:

- Provide "next generation" education on race and racial equity to leaders and staff alike, based on *their desire* to be involved, to move our culture more toward making racial equity a principle tenet of the City of Seattle's leadership philosophy. Current training could remain as is to maintain awareness city-wide. We can clarify this point for you in person if you like.
- Embed more thorough racial equity consideration in our work via policy and ordinance revision: use racial equity considerations as a means of problem solving at all levels in city departments.

As you will see in reading the chapter summaries, the staff we enlisted to do this work are not only subject matter experts in their field, many of them also have a grasp of the racial equity implications for their subject. If equally qualified people were involved during the development of the MHA, imagine how much more thoroughly racial equity could have been considered and embedded in the 3 alternatives. But we shouldn't go back now and do it over; we should acknowledge what we have learned, and proceed with that new insight.

Our group was also often able to demonstrate where the interconnectivity of subjects and departments can lead to solutions that serve the public better. That is after all the end goal of RSJI, to have a work force that can work effectively together across departments, and lead in its problem solving from a racial equity perspective, creating solutions that serve the most marginalized among us, and providing better outcomes for everyone in Seattle.

The future

To prevent situations such as this missed opportunity during program development in the future, we believe “the next step” must be taken in our city’s Race and Social Justice Initiative. The suggestion of the interdepartmental team, while specific to the MHA at this point, could very well be a model for work throughout the city. This group would be made up of people who are not only SME's in their field, but who are also SME's in racial equity.

We often address racism as if it were a "thing" that can be removed, and attempt to understand it using only quantifiable information and address it using tools. I believe to remove racism, you need to work on the "heart part" first: you need to face your own relationship with race and racism first before you can engage others, take on and understand others position, history etc. You need to understand what you have experienced, what other people have gone through, and what they go through every day. Simply put you need to understand the "why" before you can move on to the "how". Not everyone is comfortable with this part of the work: being uncomfortable at times to gain the knowledge needed to bring about change. But it is necessary and can be a transformational experience, individually and for a group. Only then can you address the "mind part", the subject matter expertise we already bring to our jobs, while considering the viewpoint of racial equity. Our good-will alone and the best tools we can offer will not get the job done unless we understand our part in it, and why it needs to be done.

Any group attempting to undo racism would need to truly be a team, and would need to be able to trust each other and work from a common background and understanding. I suggest this group be involved in a facilitated exploration of race and racism, to learn racism's effect on each of us individually, and on our city, past and present, and how it will affect our future. We need to understand our own relationship with racism before we can understand others, and few take the time to really do this. Again, starting with the "heart part" and moving to the "mind part" as a group builds the trust and hones instincts and ability to recognize what has been there all along, by hearing other people’s experiences and relating them to our own. Through this work, they would begin to isolate and understand the different components of our community, and to understand the effects of our decisions and policies on the people of our city. They would begin to see where their positional expertise is reflected in our community, by speaking to the community, and learn to hone the way they implement their ideas via policy and practice by actually seeing and hearing the outcomes of past work and current conditions. They would eventually be able to employ both their professional discipline and their experience with the RSJ group and the community at large to develop the approaches and the questions that will reveal what is the right approach to equitable development of our city... to answer not only the question "where should development happen" but also "how should development happen to maintain our city's overall diversity?"

Conclusion

The answers to these questions can't be provided by any one person, they can only be revealed through consideration and exploration of oneself, then as a member of a trusted circle, and finally in the communities we work for. That must take place in real time. This inter-departmental, multi-disciplined, race and social justice team is the group who can begin to forge a path toward our equitable future.

As a city, to truly sustain the RSJI effort, it makes sense to develop as many groups over time as is deemed necessary to achieve RSJI's goal: *to remove racism from the city of Seattle*. If we want to remove racism, we must put this work clearly into the necessary budgets and commit to spending the time, building the teams, and doing the work, until capacity is great enough that a new, updated idea can be put forth to better serve the times as they change.

So, there is much to do, but we can start now. All it takes is a decision and the will to change.

Seattle is seen nationwide as a leader in racial equity consideration in municipal government. But the nationwide racial equity effort is huge, and growing. There are many cities who are doing work that will establish and maintain great racial equity outcomes for their communities. We want Seattle to continue to lead the way, but we will have to do better for this to happen; we will have to be brave and innovative. These suggestions may not all be the right answers, but we are using what we have learned and approaching this work by trying to ask better questions. If we all start asking better questions, to say "what if..." more than we say, or even think "we can't..." we just may figure out a way to do what so many in our country say can't be done.

Everyone is learning when it comes to race relations and racial equity. No one is the hands-down expert, and it is going to take brave people to set things in motion, regardless of when we start or what we do.

But we must start somewhere. We must start sometime.

Thank you for the opportunity to review and potentially be included in this work. We truly hope it results in groundbreaking effort to make a more fair and just community for us all.

Dan Nelson
On behalf of the MHA EIS Racial Equity Review Team
11/17/17

MHA program staff response to MHA DEIS Racial Equity Review, December 2017

- “MHA EIS Racial Equity Review Response Letter.” Email from Sara Maxana to Dan Nelson. December 15, 2017. (2 pages)
- Attachment A: “All hands on deck for MHA EIS RSJI review.” Email from Robert Feldstein to Department Directors. May 19, 2017. (2 pages)
- Attachment B: “How EIS process considered racial equity.” Memo by the Office of Planning and Community Development. December 2017. (4 pages)
- Attachment C: “Affordable Housing Community Feedback from Department of Neighborhoods Community Liaison Program.” Memo from Virginia Weihls to Kathy Nyland. August 14, 2017 (6 pages)
- Attachment D: “Equitable Development Monitoring.” Memo from the Office of Planning and Community Development. December 2017. (1 page)

From: "Maxana, Sara" <Sara.Maxana@seattle.gov>

Date: December 15, 2017 at 2:52:21 PM PST

To: "Nelson, Daniel W" <Daniel.Nelson1@seattle.gov>

Cc: "Feldstein, Robert" <Robert.Feldstein@seattle.gov>, "Walker, Steve" <Steve.Walker@seattle.gov>, "Torgelson, Nathan" <Nathan.Torgelson@seattle.gov>, "Kubly, Scott" <Scott.Kubly@seattle.gov>, "Nyland, Kathy" <Kathy.Nyland@seattle.gov>, "Finn Coven, Jessica" <Jessica.FinnCoven@seattle.gov>, "Hara, Mami" <Mami.Hara@seattle.gov>, "Aguirre, Jesús" <Jesus.Aguirre@seattle.gov>, "Weis, Larry" <Larry.Weis@seattle.gov>, "Lester, Catherine L" <Catherine.Lester@seattle.gov>, "Assefa, Samuel" <Samuel.Assefa@seattle.gov>, "Alvarado, Emily" <Emily.Alvarado@seattle.gov>, "Brand, Jesseca" <Jesseca.Brand@seattle.gov>, "Wentlandt, Geoffrey" <Geoffrey.Wentlandt@seattle.gov>, "Podesta, Fred" <Fred.Podesta@seattle.gov>, "Sheehy, Katie" <Katie.Sheehy@seattle.gov>, "Larsen, Shauna" <Shauna.Larsen@seattle.gov>, "McLain, Susan" <Susan.McLain@seattle.gov>, "Auriemma, Anthony" <Anthony.Auriemma@seattle.gov>, "Kelly, Jason W" <Jason.W.Kelly@Seattle.Gov>, "Price, Leslie" <Leslie.Price@seattle.gov>, "Gilliss, Edie" <Edie.Gilliss2@seattle.gov>, "Canzoneri, Diana" <Diana.Canzoneri@seattle.gov>, "Gardheere, Ubax" <Ubax.Gardheere@seattle.gov>

Subject: RE: MHA EIS Racial Equity Review

Dan,

Thank you for the tremendous amount of time and energy that you and members of the Citywide Mandatory Housing Affordability (MHA) Draft Environmental Impact Statement (DEIS) Racial Equity Review Team (hereafter "Racial Equity Team") put toward evaluating the racial equity considerations in the DEIS. As expressed in the May 19th directive from the Mayor's Office to Department Directors to allow staff time to work on this important review process (Attachment A), robust RSJI analyses are key to ensuring our policies shape a more equitable future. An RSJI assessment of an DEIS had never been done before, and we appreciate both your work to complete this unprecedented request and the feedback that you have provided so that we can learn from this experience and improve in the future.

Your November 17th letter assesses the DEIS and offers several recommendations for improved collaboration and monitoring as MHA moves forward. Because the letter concerns the DEIS, we are including in this response an updated summary of how the EIS process—including additional analysis and selection of a Preferred Alternative in the Final EIS—considered issues related to race and racial equity (Attachments B and C). While we feel it is important to provide this documentation as a reflection of our work and principles, we wholeheartedly agree with the spirit of the review letter that we can and should always strive to do better to evaluate, understand, and respond to the potential impacts and benefits of the City's policy actions on racial equity in Seattle.

As you know, the Mayor's Office transmitted the Citywide MHA implementation legislation to City Council on November 14th. City Council will review and consider the legislation from January to August 2018. There could be many opportunities for Racial Equity Team involvement in the Council process. Department Directors and the Mayor's Office should collaborate with Council to discuss and define specific roles for the Racial Equity Team, and determine the appropriate time and resources to carry them out.

Moving forward, we would welcome an opportunity to brief the Racial Equity Team about community engagement activities and how MHA addresses disparities experienced by people of color. In addition, we would value opportunities to work with Racial Equity Team members to evaluate and implement ongoing and future City programs and policies, including MHA. As an example, the Equitable Development Monitoring Program (see Attachment D) addresses several of the issues raised in the DEIS review letter and could benefit from Racial Equity Team members' input.

Thank you again for your time and energy to provide us with this feedback.

Sara

From: [Feldstein, Robert](#)
To: [Walker, Steve](#); [Torgelson, Nathan](#); [Kubly, Scott](#); [Nyland, Kathy](#); [Finn Coven, Jessica](#); [Hara, Mami](#); [Aguirre, Jesús](#); [Weis, Larry](#); [Lester, Catherine L](#)
Cc: [Assefa, Samuel](#); [Maxana, Sara](#); [Majeski, Quinn](#); [Sheehy, Katie](#); [Nelson, Daniel W](#); [Podesta, Fred](#)
Subject: All hands on deck for MHA EIS RSJI review
Date: Friday, May 19, 2017 3:22:00 PM
Attachments: [DRAFT HALA MHA DEIS review v2.docx](#)
[image001.png](#)
[image002.png](#)

Dear Directors –

As you know, the Housing Affordability and Livability Agenda (HALA) is one of Mayor Murray’s highest priority programs. Over the last two years, staff members from your and other City departments have engaged in incredible work – conducting policy analysis and community engagement to help shape Citywide rezones to implement new Mandatory Housing Affordability (MHA) requirements. As a next important step towards introducing legislation this year, an Environmental Impact Statement (EIS) studying these rezones is expected in June.

Growth and equity have been considered in the EIS, however a closer look at RSJI issues and impacts will ensure that we draft legislation with strong racial equity lens. **We are requesting that you identify staff with RSJI experience and/or EIS experience to help create a summary document of the racial equity impacts. I understand that staff members from most of your departments have already assisted with a technical review of the EIS, and may be a helpful resource to the RSJI staff.**

We hope to bring not only a more focused RSJI review of the growth alternatives outlined in the EIS, but also to translate the document into a more easily understood plain language format. This will go a long way to helping our residents engage with this lengthy and technical document. Additionally, this RSJI review team will identify programs underway and policies being developed—in addition to MHA—that will help mitigate residential and commercial displacement as our City grows.

The various subjects in the EIS would be best analyzed by the corresponding departments and their subject matter experts, listed below:

- Housing and socioeconomics – OH
- Land Use – SDCI
- Aesthetics, height/bulk/scale – SDCI
- Transportation – SDOT
- Historic resources – DON (they have staff who support historic district boards)
- Biological resources – OSE, SPU, SDCI
- Open space and recreation – Parks
- Public services and utilities – SPU, City Light, HSD
- Air quality – OSE

Given the tight timeframe, it makes sense we employ the best talent we can get throughout the city. A draft workplan is attached for your sense of scope and schedule. Please work with your staff to make time for this important work.

Robust RSJI analyses are key to ensuring our policies shape a more equitable future, which has been one of the driving goals of this administration. The SDCI\OPCD Change Team will lead this review. Please work with Dan Nelson (Daniel.nelson1@seattle.gov) and Katie Sheehy (katie.sheehy@seattle.gov) to be sure the RSJI analysis is well-staffed or if you need more information.

Thanks again for your help. Happy to answer any questions as well.

-Robert

Robert Feldstein

Director, Office of Policy & Innovation

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How the Citywide MHA Implementation DEIS and FEIS considered race and racial equity

December 2017

The Citywide MHA EIS process considered race and racial equity in several ways, including:

- Building on several large bodies of work that evaluated Seattle’s growth patterns, including implications by race and ethnicity;
- Using a racial equity lens in designing and carrying out community engagement;
- Integrating race and ethnicity directly into the creation of the DEIS Action Alternatives;
- Expanding on the analysis of racial equity and cultural displacement in the FEIS; and
- Selecting an FEIS Preferred Alternative that differentiates growth based, in large part, on displacement risk.

While the following sections highlight some ways in which race and racial equity were considered in the EIS process, we agree that we should always strive to better to analyze and understand racial equity implications of policy choices.

Building on previous work

The Citywide MHA EIS process was a relatively short 14-month process that built upon many years of policy development and analysis from several previous bodies of work that considered racial equity implications of housing policy and growth in Seattle:

- [Housing Affordability and Livability Agenda \(HALA\) Report \(2015\)](#). The HALA report documents Seattle’s housing affordability challenges, including a history of discriminatory land use practices that have contributed to patterns of racial segregation that persist today, and lays out a suite of 65+ strategies to increase affordable and market-rate housing choices, provide better supports to tenants, and prevent residential displacement. The HALA Advisory Committee process used a specialized racial equity lens tool—a set of questions to be applied to measure the racial equity implications of each policy being considered—that was developed by the Office of Civil Rights for the Committees use in their deliberations. Citywide MHA is a cornerstone of the HALA report, and implements several specific HALA recommendations.
- [Seattle 2035 Growth and Equity Analysis \(2016\)](#). The Growth and Equity Analysis developed two indices—Risk of Displacement and Access to Opportunity—to assess socioeconomic equity implications (including factors of race and ethnicity) of Seattle’s growth patterns. The Displacement Risk index was a composite of 14 variables, including people of color (percentage of population that is a race other than non-Hispanic white, 2010 Census) and linguistic isolation (percentage of households in which no one over age 14 speaks English, 2008-2012 ACS). By using these indices as the foundation for the Action Alternatives, the Citywide MHA EIS intentionally makes race an integral, rather than after-the-fact, consideration in evaluating alternative growth patterns.
- [City of Seattle and Seattle Housing Authority Joint Assessment of Fair Housing \(2017\)](#). The Fair Housing Assessment is Seattle’s most comprehensive and up-to-date evaluation of housing

access and choices for protected classes, including race and national origin. The Assessment recommended citywide MHA implementation as a critical strategy to “promote equitable growth that harnesses new development to create diverse, affordable housing choices throughout the city,” and “preserve and increase affordable housing in communities where residents are at high risk of displacement.” The Citywide MHA FEIS includes several analyses on growth and segregation directly from the Fair Housing Assessment.

Engaging Community

Many community members—particularly lower-income households and communities of color—have been traditionally underrepresented and underserved in City processes. [Council Resolution 31612](#) that expressed the MHA program development work plan called on the Department of Neighborhoods’ to create an inclusive engagement plan with targeted outreach to these communities.

These efforts included meeting community members where they already meet, such as Community Conversations at Seattle Goodwill, Ethiopian Community Center, New Holly, and Filipino Community Center—all including live translation into several different languages. City staff worked with existing community based organizations, such as Urban League, Centerstone, and Latino Equity Network, to host lunches to discuss MHA with community members that work with vulnerable populations. City staff worked with the Capitol Hill Renter’s Initiative to involve renters in planning conversations for MHA.

During the nine-month facilitated process in 2016 that shaped the MHA implementation principles, the City selected focus group members based on demographic factors (including race) and offered stipends, transportation assistance, and childcare to facilitate equitable participation. The City also contracted with community-based organization, Puget Sound Sage, to provide assistance to community members from traditionally under-represented demographics to ensure that they had the support to fully participate in the meetings.

The City also translated key materials into both people-speak and into seven top-tier languages to make them more accessible to diverse community members. City staff worked with Community Liaisons to provide interpretation at several of our community meetings. The City also employed an ethnic media strategy to invite community to events. We provided translation into seven languages for a mailer sent to 88,000 households, and a translation and voice over for the HALA-related informational videos.

In the door to door education efforts that targeted over 10,000 homes proposed for MHA rezones, the City hired culturally appropriate door knockers to focus on areas that were high-level Spanish, Mandarin, and Vietnamese speaking. The City also worked with Univision to present the MHA program in language and answer relevant questions about affordable housing.

The City also relied on the Department of Neighborhoods Community Liaison Program to lead targeted and culturally-appropriate engagement activities with immigrant and refugee communities, communities of color, and low-income communities. Attachment C is a memo that summarizes community feedback on affordable housing gathered through the Community Liaison Program from February 2016 through June 2017.

More information on these engagement activities, and how they shaped the Preferred Alternative in the FEIS, may be found in [FEIS Appendix B: Summary of Community Input](#).

Integrating race and ethnicity into the Action Alternatives

The DEIS used the [Seattle 2035 Growth and Equity Analysis](#) to develop the two Action Alternatives. As mentioned above, the Growth and Equity Analysis comprises two indices: a Displacement Risk index and an Access to Opportunity Index. The Displacement Risk index is a composite of 14 variables, including people of color (percentage of population that is a race other than non-Hispanic white, 2010 Census) and linguistic isolation (percentage of households in which no one over age 14 speaks English, 2008-2012 ACS). Therefore, these measures of race and ethnicity were integrated—along with other variables that contribute to displacement risk—into the two Action Alternatives that were the foundation of analysis for each chapter.

Specifically, the two Action Alternative differentiated the amount of new growth directed towards communities based on their displacement risk and access to opportunity index scores. In Alternative 3, communities with high risk of displacement (which, due to the people of color and linguistic isolation measures mentioned above, tend to be communities with a higher percentage of racial and/or ethnic minorities) received less intensive zoning changes than in Alternative 2. In addition, each chapter discussed impacts by the four community types based on displacement risk (high/low) and access to opportunity (high/low). Therefore, it can be inferred throughout the chapters, that greater or lower impacts on communities at high displacement likely translate to greater or lower, respectively, impacts on communities of color.

Expanding analysis in FEIS

The DEIS received over 800 written comments and public testimonies, including comments from City Council members and key stakeholder groups asking for additional analysis in the FEIS to expand the understanding of racial equity and cultural displacement. In response, the MHA team incorporated new analyses and narrative text, including:

- Added historical context about discrimination in land use regulation in Seattle
- Summarized of 2017 Assessment of Fair Housing
- Added more race-specific demographic data
- Identified locations of communities of color more clearly
- Strengthened discussion of cultural displacement
- Improved and updated analysis of relationship between development and displacement, including relationship between new development and gain/loss of households of color
- Discussed specific displacement impacts for communities of color
- Expanded zoning and non-zoning-based mitigation strategies for displacement

The racial equity and displacement related narratives and data analyses in the EIS responded to [Council Resolution 31733](#). These analyses exceeded what is required by state law, and represented the deepest assessments on these topics in any land use EIS the City has ever completed. The Final EIS also identified strategies, including and beyond MHA, that can provide affordable housing and commercial spaces to combat the residential and cultural displacement that disproportionately impacts communities of color in Seattle. These expanded sections address many of the issues raised in the Racial Equity Team review letter attachments.

Selecting a Preferred Alternative

The Citywide MHA Preferred Alternative, which is the basis for the proposed implementation legislation, uses the Seattle 2035 Comprehensive Plan's [Growth and Equity Analysis](#) to distribute new zoning capacity across Seattle communities. The FEIS Preferred Alternative that serves as the Citywide MHA final proposal provides more housing choices through more intensive zoning changes in communities with high access to opportunity and low risk of displacement—many of which are historically white communities with relatively less opportunities for multi-family housing. In many cases, a history of discriminatory land use practices, such as the use of racial covenants, have made these neighborhoods less accessible to communities of color. The [Joint Assessment of Fair Housing](#) (2017), which documented greater racial and ethnic integration in several of these neighborhoods with the recent development of more multifamily housing, recommended MHA rezones as a strategy to increase housing choices in high access to opportunity communities.

The FEIS Preferred Alternative directs less intensive changes to communities at high risk of displacement, which disproportionately includes communities of color. In these communities, new housing choices are critical to ensure that we are generating new affordable housing through MHA. However, if affordable housing choices are not able to keep pace with larger scale changes, current community members may experience greater displacement pressure as their communities change and grow. Less intensive changes in these communities ensure that market rate development contributes to affordable housing—a key tool for addressing displacement—while reducing the relative scale of change to these high displacement risk communities.

Memo

To: Kathy Nyland, Director, Department of Neighborhoods

From: Virginia Weihs, Community Liaison Program, Department of Neighborhoods

Date: 8/14/17

Re: Affordable Housing Community Feedback, 2016-2017 – DON Community Liaison Program

Summary: In 2016 and 2017, the Department of Neighborhoods (DON) Community Liaison Program, through outreach and engagement collaborations with other City departments, talked with and heard from members of various immigrant and refugee communities, communities of color, and low-income communities in Seattle about the topic of affordable housing. This Memo is a summary of the common themes we heard in our outreach work.

Methodology: This information was collected from February 2016 – June 2017. It was collected informally, via observations and notes about what people asked or expressed interest in at community meetings; the reports and comments of our Community Liaisons; notes from post-event evaluation forms; and some topic-specific surveys. Please see Appendix 1 for more details about where this information was collected from.

This is a snapshot. The themes outlined here only represent what we heard via our outreach around specific arenas of affordable housing, with specific communities, where we provided specific ways for community members to share their feedback. It is in no way a comprehensive analysis of the concerns, needs, or questions of immigrant and refugee communities, communities of color, or low-income communities in Seattle as relates to affordable housing. There are many other reports and analyses that address this topic and could importantly enrich and supplement the information we heard— we have listed some of them in Appendix 2.

Themes we heard from community members:

- **Affordable housing is a pressing concern for low-income communities in Seattle.** Specific issues identified included the following:
 - Affordable private market housing is difficult to find in Seattle. Where it does exist, it is often of poor quality and has safety issues.
 - There is a strong interest in accessing publicly subsidized housing.
 - There is interest in homeownership. However, the high costs of homeownership and limited resources for low-income home buyers mean it is out of reach for many.
 - Low-income communities are experiencing high levels of displacement from Seattle due to the lack of affordable housing in the city. Community members feel this results in displacement from community institutions and supports, jobs, and school systems.
- **Though affordability is the primary housing-related issue, other significant barriers to finding and securing housing also exist.** People named the following barriers:
 - Language barriers – These make it challenging to find and apply for housing, to understand leases and navigate other housing paperwork.
 - Credit history – Issues like poor credit, a lack of credit history, or not having a social security number make it difficult to apply for and receive housing.
 - Household size – Larger families described it being difficult to find apartments that were adequate for their family size.
 - Employment verification – Work that is “under the table,” seasonal or unstable prevent community members from providing the employment verifications necessary when applying for housing.

- Section 8 – Section 8 voucher holders reported it being difficult to find housing that accepted their vouchers and to find Section 8 supported housing appropriate for their family size.
- **Though affordability is a driving factor in choosing housing, other factors are also important.** Other factors that people named as being important to them in housing choice included:
 - Proximity to cultural communities and institutions
 - Proximity to support networks
 - Proximity to children’s schools
 - Proximity to employment. This included in-home employment – the specific example of in-home childcare providers was given, where requirements for their childcare businesses necessitated certain kinds of housing units.
 - Safety and living conditions
 - Size
- **There is a strong need for ongoing and culturally specific/community specific opportunities to access information about housing and housing-related resources.**
 - People are not necessarily aware of City resources, supports, and laws. These include cost savings programs like the Utility Discount Program and Orca Lift resources, City programs and processes to support tenants, and legal protections established by federal and city law.
 - Language support and logistical support to understand these programs and apply for them was helpful when it was offered.
 - Communities benefit from community-centered approaches to outreach – for example, collaborating closely with community organizations, meeting in community spaces, giving people the opportunity to address community specific questions and concerns, etc.
 - Sustained community outreach helps ensure communities stay in the loop about both new and existing resources, supports, and laws. It also helps the City understand what issues are impacting communities.
 - It’s easier for communities to understand city programs and policies when there is less jargon used and more clarity offered around the specific impacts of program and policies on people’s day to day lives.

APPENDIX 1: AFFORDABLE HOUSING RELATED OUTREACH DONE BY COMMUNITY LIAISON PROGRAM IN 2016-2017

- Community Liaison Program
 - o The Community Liaison program is operated under the Leadership Development Division in the Department of Neighborhoods. DON's Community Liaisons are a team of paid independent contractors located throughout Seattle. Community Liaisons assist City departments in their outreach and engagement efforts to various historically underrepresented communities, working to ensure that the City provides information to all community members, forges connections, fosters relationships, and receives rich, diverse, and meaningful civic participation.
- Departments partnering with the Community Liaison Program on outreach work related to affordable housing:
 - o Department of Neighborhoods, Housing Affordability and Livability Agenda (HALA) outreach (March 2016-Present)
 - o Office of Housing, Housing Levy outreach (February 2016-March 2016)
 - o Office of Housing, surveys related to proposed Affirmative Marketing program (February 2017-May 2017)
 - o Seattle Department of Construction and Inspections, Rental Registration and Inspection Ordinance (RRIO)/Renting in Seattle Outreach (March 2016-Present)
- Venues for this outreach work
 - o Community Conversation/Staff Conversations
 - Outreach Model:
 - Community Conversations/Staff Conversations are an outreach and engagement model in which DON brings presentations from City departments and information on various City programs and services to different community-based settings and organizations throughout Seattle.
 - o Community Conversations take place where people already congregate, such as low-income housing, ESL/jobs programs, faith-based institutions, etc. Community liaisons provide support through interpretation, translation, and support for attendees to navigate the information/resources.
 - o Staff Conversations are smaller conversations specifically for staff of community based organizations – usually there are only presentations, not services offered, and interpretation is not usually necessary. The intent is to educate staff who are on the front-lines with community members, either through case management or other service provision.
 - Locations:
 - 3/23/16 Goodwill Job Training and Education Center
 - 3/30/16 Ethiopian Community in Seattle
 - 4/28/16 Asian Counselling and Referral Services
 - 7/27/16 Ethiopian Community in Seattle
 - 8/5/16 International Drop-In Center
 - 8/8/16 Latino Community Fund (Staff Conversation)
 - 8/12/16 Urban League (Staff Conversation)
 - 9/4/16 Goodwill Job Training and Education Center
 - 9/23/16 Somali Community Services
 - 9/27/16 Centerstone (Staff Conversation)
 - 1/5/17 People of Color Against Aids Network (Staff Conversation)
 - 2/13/17 Centerstone (Staff Conversation)
 - 2/18/17 Cham Refugees Community
 - 4/19/17 Goodwill Job Training and Education Center
 - 5/24/17 South East Effective Development (SEED)/Senior Housing Association Group (SHAG): Rainier Court
 - Numbers:
 - 688 clients/members of community based organizations in attendance

- 56 staff of community based organizations in attendance
- Non-English languages represented: Amharic, Cantonese, Cham, French, Khmer, Korean, Mandarin, Oromo, Somali, Spanish, Tagalog, Tigrinya, Vietnamese
- Other communities represented: African-American, People experiencing homelessness, People formerly incarcerated, People with disabilities, Seniors
- Office of Housing Surveys
 - Outreach Model:
 - 5 Community Liaisons did individualized outreach to East African, Latino, API, African-American, and Native American community-based organizations to answer a survey sent out by the Office of Housing as they develop their affirmative marketing requirements. Liaisons also arranged meetings with community based organizations and the Office of Housing, when organizations were interested and available.
 - Partnering Departments/Programs and Area of Outreach:
 - Office of Housing, Affirmative Marketing Program Outreach
 - Numbers:
 - 17 surveys completed by community based organizations with assistance from liaisons (out of 32 surveys total). These organizations serve broadly the following communities: African-American, Asian Pacific Islander, East African, Latina/o, Native American
 - 4 meetings between community based organizations and Office of Housing completed
 - Non-English languages represented: Cham (doing outreach to broader Asian Pacific Islander community), Somali (doing outreach to broader East African community), Spanish (doing outreach to broader Latina/o community)
 - Other communities represented: African-American, Native American
- HALA Community Focus Groups
 - Outreach Model:
 - In 2016, the City hosted Community Focus Groups comprised of diverse resident volunteers from neighborhoods across the City. Focus Groups met monthly to discuss and give feedback on the HALA plan, specifically focused on the Mandatory Housing Affordability (MHA) implementation principles. Community Liaisons representing 4 different neighborhoods (Judkins Park/Central Area, Lake City, Rainier Valley, South Park) were participants in the focus groups. 3 of these liaisons also did additional outreach/information gathering work to identify their broader community's priorities for housing affordability and to share information with them about HALA/MHA.
 - Partnering Departments/Programs and Area of Outreach:
 - Department of Neighborhoods/Office for Planning and Community Development, HALA Outreach
 - Numbers:
 - 4 Community Liaisons attended monthly Community Focus Groups for 7 months
 - Community Liaisons collected detailed stories of affordable housing issues from 8 Latina/o and Somali residents of Seattle/King County
 - One Community Liaison hosted a meeting at a Seattle Housing Authority (SHA) building in Lake City with 10 SHA residents and HALA staff to discuss affordable housing issues and questions
- Other Community Meetings
 - Outreach Model:
 - Housing Levy Community Meetings were hosted in February/March 2016 to share information about the upcoming housing levy. Community Liaisons did outreach to bring people to two meetings and provided interpretation at the meetings. Communities represented by the community liaison outreach included: Cantonese, Oromo, Somali, Spanish, Tagalog, Tigrinya, and

Vietnamese. The meetings for which Community Liaisons provided outreach were:

- 2/24/16, at Hing Hay Coworks (Chinatown/International District)
- 2/25/16, at New Holly Community Center (Rainier Valley)
- Partnering Departments/Programs and Area of Outreach:
 - Office of Housing, 2016 Housing Levy Outreach
- Numbers:
 - Approximately 150 people in attendance at 2/24 and 2/25 Community Meetings, including representation from all communities outreached to by the Community Liaisons
 - Non-English languages represented: Cantonese, Oromo, Somali, Spanish, Tagalog, Tigrinya, and Vietnamese (Community liaisons did outreach in these languages specifically, but other language speakers/communities were also in attendance)

APPENDIX 2: ADDITIONAL COMMUNITY AND GOVERNMENT REPORTS RELATED TO AFFORDABLE HOUSING NEEDS

- This is a selection of several community and government reports related to affordable housing needs that could provide helpful additional context. It is meant to be a snapshot of some other local work done on this topic and is by no means complete or comprehensive.
 - [Vietnamese Community Assessment Report](#) – Vietnamese Friendship Association, 2010
 - [“Our People, Our Planet, Our Power”](#) – Got Green, 2016
 - [Quiet Crisis: Age Wave Maxes Out Affordable Housing, King County 2008-2025](#) – Aging and Disability Services, City of Seattle Office of Housing, Seattle Housing Authority, King County Housing Authority, City of Seattle Human Services Dept, King County Housing and Community Development, 2009
 - [“Voices of Seattle’s East African Communities” Report](#) – City of Seattle, Office of Immigrant and Refugee Affairs, 2016
 - [City of Seattle and Seattle Housing Authority Joint Assessment of Fair Housing](#) – City of Seattle and Seattle Housing Authority, 2017

Equitable Development Monitoring Program

OPCD is currently leading an interdepartmental process to develop an Equitable Development Monitoring Program. This program responds directly to [Council Resolution 31577](#), which called for greater integration of racial equity in the Comprehensive Plan, the creation of the Equitable Development Initiative (EDI), and monitoring of associated equity measures.

The Equitable Development Monitoring Program is described in the 2035 [Comprehensive Plan](#) (page 16) and outlined in more detail in the [EDI Implementation Plan](#) (pages 37-41). As laid out in the EDI Implementation Plan, OPCD is managing the monitoring program and designing the equitable development indicators with the involvement of the Planning Commission, community leaders, marginalized populations, and interdepartmental collaboration.

The EDI indicators will include metrics to gauge progress over time in achieving equitable development outcomes as well as a specialized set of metrics designed to provide early warning signals of heightened displacement risk.

- [Heightened Risk Indicators](#) will be compiled and updated on a frequent basis—generally at least annually—to facilitate a timely response. Examples of potential indicators are included in EDI Implementation Plan.
- [Equitable Outcome Indicators](#) are longer-term indicators and will be updated as data sources allow. The indicators selected for inclusion in the monitoring program will be based on further research and input. OPCD is currently in the process of conducting this research and working with the Planning Commission, EDI Advisory Board, EDI Interdepartmental Team, and others to obtain input and plan broader outreach to identify the indicators.

[Opportunity for Racial Equity Team Input](#). Providing input on the development of the EDI indicators would provide members of the Racial Equity Team with an opportunity to help shape some of the key information the City will be monitoring related to displacement, housing affordability, and equitable development more broadly. Factors affecting the risk of displacement, the amount of progress being made on housing affordability, and the related problems of disparate access to opportunity are central to the scope of the EDI Monitoring Program. These represent some of the key issues that the Racial Equity Team raised, and we appreciate the team members' keen interest in the collection and monitoring of data needed to more fully understand racial and social equity regarding these issues. The Racial Equity Team's experience using a racial equity lens in grappling these issues would provide valuable insights to help inform the development of the EDI indicators.

[Next Steps](#): Diana Canzoneri, OPCD, who is coordinating the EDI Monitoring Program, will reach out to Racial Equity Team members to follow up.