



## ***Securing Solid Commitments, Setting the Stage for Success: Advancing Equity through the Adoption and Implementation of Seattle's 2016 Comprehensive Plan***

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American cities are at a critical moment in history. Central cities have been growing rapidly over the past decade, reversing trends of previous decades. Immigration rates are higher than they have been in almost a century. The population of cities, and of the nation as a whole, is growing in racial and ethnic diversity. Technology is changing where and how people work, with long-term implications for transportation and land use. Amidst this, aging infrastructure, growing economic inequality and disparities in health and wellbeing, along with climate change, threaten the long term viability of cities.

In this critical time, efforts must be taken to ensure that communities are safe, sustainable, and equitable. This will require advancing policies and strategies to build an economy in which everyone can participate, prosper, and reach their full potential. It will require focusing public investments to ensure healthy communities. And it will require collaboration across fields and sectors to leverage wisdom, innovation, and impact. These changes can come about when community advocates have the tools and capacity to promote positive reforms in local government and participate throughout the process, and also when public officials have the tools, resources and political support to create economic opportunity and health in all communities.

### **Planning for Equity in Seattle**

The City of Seattle Comprehensive Plan, *Toward a Sustainable Seattle*, is a 20-year vision and roadmap for Seattle's future. A framework for growth and preservation within Seattle, the plan guides City decisions on where and how to build new jobs and houses, how to improve the transportation system, and where to make capital investments such as utilities, sidewalks, and libraries. The plan – which holds community, environmental stewardship, economic opportunity and security, and social equity as core values – is currently in revision and slated for adoption in 2016.

The revision of Seattle's municipal comprehensive plan represents a key moment in the evolution of the city's commitment to these critical equity-driven strategies. It is a unique opportunity for the city to play a leadership role in the State of Washington – and nationally – demonstrating how to utilize municipal planning, policymaking, goal setting, and budgeting to drive equity through future growth and direction-setting for priority issues. Not only are the familiar domains of land use, housing, transportation, capital budgeting and environmental quality ready for new attention, but they can now be aligned with a broader view of the

components of a successful and equitable city. Health, climate, sustainability, and the role of arts and culture in equitable growth are among the “new wave” of issues being addressed in comprehensive plans.

Seattle is already seen as a national leader in these areas. There are more than a dozen initiatives, offices and programs of the City of Seattle, and others advanced by the King County government, which are increasingly known through the U.S. as pace-setters in these arenas. The City of Seattle made social equity a priority value in 1994 when it initially adopted its comprehensive plan. With the update of this comprehensive plan, the City has the opportunity to deepen and advance equity through stronger, smarter goals and policies. It also can build on what Seattle and other cities have learned in decades of implementation, solidifying the City’s leadership in this arena.

In anticipation of the comprehensive plan adoption, the Seattle Office for Civil Rights and the Department of Planning and Development invited PolicyLink to analyze the draft Comprehensive Plan and to provide guidance on implementation in late 2015. This invitation follows a 2014 contract in which PolicyLink shared best practices with City staff and elected leadership on how to incorporate equity into its growth scenario modeling and into its Comprehensive Plan chapters. It builds on over 16 years’ experience that PolicyLink has amassed increasing equity impact in local government through consultation and advising to scores of cities, counties and regional authorities that have incorporated equity goals into their sustainability strategies.

This report summarizes the research and recommendations from PolicyLink efforts in Seattle in two parts:

- The first part of the report includes in-depth research and analysis of the July 2015 draft plan. It opens with overarching recommendations for cultivating equity in the language of the 2016 Comprehensive Plan. Analysis and recommendations of specific goals and policies are included, along with recommendations for priority measures.
- The second discusses opportunities to achieve equity in the implementation of a comprehensive plan, drawing from prominent examples taking place across the country. A framework for equitable implementation outlines promising strategies for comprehensively addressing equity in the implementation of the comprehensive plan. Finally, specific recommendations for success in Seattle’s implementation build upon information shared at meetings between PolicyLink, the City, and community partners in Seattle in October 2015.

The information in this report has been vetted and updated after meetings with Seattle officials and community leaders in October 2015. PolicyLink does not claim, of course, the local knowledge of Seattle residents and planners, so this review is, by design, limited in its scope and perspective.

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# Part I. Recommendations for Cultivating Equity in the Language of the 2016 Comprehensive Plan

A comprehensive plan can be a vehicle for building bridges across the departments and categories by which local government is organized in order to help residents and officials alike see and act upon the future of the city as an integrated whole. It can stimulate interdepartmental collaborations and focus on the holistic needs of neighborhoods and populations. It can also help residents look beyond their neighborhoods and see how those most immediate issues of stability, growth and change are inextricably tied to the city's trajectory toward overall health and equitable development. In Seattle, where growth management strategies and neighborhood plans have been the focal point of most of the attention so far, the Comprehensive Plan Update (CPU) can provide a guide to how all the operating systems of the City can relate and contribute to those growth patterns.

The breadth of a comprehensive plan also creates two challenges which go along with the opportunity to portray and act upon the 'big picture.' One is simply that there is an enormous amount of information and innumerable moving parts to track and understand, much less get moving in a coordinated fashion. The second is that a comprehensive citywide approach to equity is a relatively new way to think about the operations of government. The equity goals and objectives for each element reflect the ways in which the issues of access to opportunity, displacement, and inclusion in the processes of decision-making have been addressed in each issue area. Now they can be brought together in a way that is consistent and relevant to the core strategies for guiding the city's growth.

With these opportunities and challenges in mind, we offer in the sections that follow a few comments on the growth strategy and a set of overarching recommendations related to the CPU review, followed by comments on each element.

## Overarching Recommendations

A review of the draft plan from a racial equity perspective resulted in:

- Critique of how equity is measured and addressed by the Urban Village Strategy;
- Identification of new equity goals and policies in each Element and ways to strengthen them; and
- Opportunities to create new goals and policies where gaps have been identified.

Among approximately one dozen elements, several themes emerged. These pertain to evenness and consistency across the elements, the use and integration of data across the issues and geographies, the need for better internal cross-referencing for a more integrated approach, and use of language that will facilitate implementation and monitoring.

1. ***Provide a clear vision for an equitable future through the use of shared definitions and consistent framing:***  
One of the biggest challenges to local governments across the nation attempting to address the

nexus between growth and equity is elected officials lacking a clear vision of an equitable future. This often leaves community members and staff feeling at a loss for tools to move forward.

Seattle has Resolution 31577, which provides relevant definitions and guidance that can serve to guide City operations to achieve equity. Resolution 31577 includes a vision, shared operating definitions of key terms, and an analytical frame for growth reflecting the paramount equity issues of our time, access to opportunity and the displacement of low-income communities of color. Integrating these components throughout the comprehensive plan will provide staff and community members with the language and parameters to encourage success.

2. ***Frame each element (chapter) with the role that element/sector plays in accelerating equity:***  
While the policies and goals set direction for equity, few elements utilized the introduction to describe the role that element could bring to equitable growth. Describing how prioritizing spending on both capital projects and services, cultivating a diverse workforce, conducting inclusive procurement, and siting projects for equity outcomes will more clearly illustrate each element's important role in advancing equity.
3. ***Consider the "comprehensiveness" of each element in the equity goals and policies provided:***  
The topics addressed in the Comprehensive Plan are not mutually exclusive from one another, and as a result, throughout this review we have made suggestions for ways to cross-reference issues and policies. While land use policies directly influence transportation patterns and impacts on environment and well-being, goals pertaining to environmental quality and well-being can in turn influence land use. These relationships are important, as development strategies and the communities themselves are not in silos defined by issue area or topic, and it is often the convergence of these issues that deepen divides between communities of opportunity and disinvested communities. However, there does not appear to be any systematic notation across the elements of strategies or policies that are directly linked or related between the elements. Including notations in each element, either in the form of a sidebar or table, may benefit future implementation and tracking. Performing this task would also require a systematic review of the intersections between the various elements, which could be fruitful in refining or improving the existing collection of equity policies. The City of Richmond Health and Wellness Element serves as one example of how to illustrate the breadth and connectedness of one element with multiple topics and accountable parties within the City, both in the format of the element and the table provided at the end.<sup>1</sup>
4. ***Aim for consistency and specificity across elements:*** While several sections of the Comprehensive Plan include a level of detail important for guiding implementation and actions for accountability, drawing from extensive analyses and voluminous presentations and considerable public debate, others are surprisingly brief and pitched at a high level of generality. It is unclear whether this brevity is intended, to provide flexibility in the subsequent creation of statutes and ordinances or implementation and enforcement, or if they are simply the result of collaborative, complicated, and/or intensive drafting processes. The authors should strive for consistency across elements, and an evenness of tone and content depth across the introductory statements, goals, and policies. This evenness should strive for consistency and specificity, particularly with regard to equity goals and strategies to achieve known inequities, is important for both mandatory elements and those the City elected to include. A cohesive equity policy framework with parity across all elements should be

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<sup>1</sup> <http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8816>

clearly identifiable and understood by the community and City staff responsible for implementation.

5. ***Use supportive data to illustrate equity concerns, recommendations, and potential implications:*** To meaningfully address equity in all elements of the Plan, it would be helpful to include relevant and important equity-focused data in the goals and policies. For instance, referencing the different growth alternatives or other big choices to be made regarding land use and development would be essential. The PolicyLink National Equity Atlas provided Seattle-specific data on many indicators of equitable growth that are relevant to Seattle's CPU. For example, measures of housing cost burden and commute times, when disaggregated by race, both show sizable disparities in Seattle. These data are informative for the goals of both the Housing and Transportation elements, and should be included in the strategy development.
6. ***Review each goal and proposed policy with the lens of accountability and measurement:*** The effectiveness of the Comprehensive Plan will be determined by the ability of the City, Seattleites, and their partners to implement the goals and policies therein. Providing stronger legal language and greater specificity for goals will help everyone to start with the same understanding and move toward the same goals. Reviewing the specific language used for each policy, and considering the extent to which they are or could be specific, measurable, attainable, realistic, and time-bound (SMART), will not only help with implementation, but also with measurement.
7. ***Center equitable investments, accountability measures, and inclusive community stewardship as the cornerstones of an equity policy framework:*** The Mayor and Council's foresight to pass a Race and Social Equity resolution before releasing a draft CPU for public review is commendable. It provides the public with a solid touchstone with which to provide feedback on the CPU. This level of transparency in the process creates more community trust, accountability and ultimately buy-in to the finalized plan. To that end, the resolution clearly directed the provision of capital investments and services to eliminate racial disparities, create equity measures with community, and make all bodies responsible for implementing the plan more representative of the city's diverse demographics. And equity policies consistently placed throughout the CPU should codify these practices so there is no question of the City's commitment to achieving equitable outcomes.

## Specific Recommendations for Citywide Goals & Policies

Initial reviews of the elements in the draft CPU unearthed varying levels of comments among our team of reviewers. Reviewers relied on the Growth and Equity Analysis, Resolution 31577, and the Equity Statements developed by the Comprehensive Plan IDT and Seattle Office for Civil Rights using the City's Racial Equity Toolkit during earlier internal drafts of the CPU. The recommendations are summarized below.

## Growth Strategy

### Analysis

The City has developed a growth strategy to accompany the CPU that encourages environmental sustainability by concentrating growth to urban villages. The City has conducted an Equity Analysis of its alternative growth strategies, and it is more ambitious, detailed and empirically focused on highly relevant equity factors than in any other city's general or comprehensive plan that we have seen. The attention given to the implications of different policy scenarios for the levels of opportunity for marginalized populations and the estimation of the risks of displacement has made those issues central to the overall CPU endeavor. The methodology and form of presentation help readers see the relationship between growth and change in each neighborhood in the citywide context with respect to opportunity and displacement risk, and that interplay between very local and citywide is critically important.

We will not get into a critique of the particular measures of displacement risk and opportunity or how distinct or correlated they may be, or what the choice of measures means for these two indexes' sensitivity to the growth alternatives. We suspect, based on our reading, not on any independent calculations, that while the composition of the indexes might be improved, that the basic four-way categorization – and characterization – of Seattle's neighborhoods is sensible, useful, and can stimulate the right discussions. The key comparative finding is that “the alternatives differ in the level of growth projected in areas where displacement risk is high.” While incentivizing growth toward “low risk of displacement/high opportunity” communities sounds like the logical preferred strategy in equity terms, the analysis reminds us that building in those areas cannot be the only approach for several reasons. Development will occur in areas of high displacement risk under any scenario, and must be accompanied by significant, well-planned, near-term public investment to support marginalized communities before their neighborhoods experience rapid changes in their demographics, built environment, and real estate markets. One of the keys to effectively implementing the Comprehensive Plan will be for those targeted investments to be specified in the other relevant City budgets and strategies. These targeted investments can involve not only housing, but “anchor” projects and policies that would support existing small businesses and community serving nonprofits and provide new economic opportunities for residents. Several examples of such projects and policies have been presented by residents and other leaders of the International District, Central District and Southeast in recent meetings with the City.

These are, of course, much more complex choices than described here or in the Equity Analysis, but the right factors are being examined and the right questions prompted. For example, one local nongovernmental reviewer of the alternatives wrote, “[t]he equity analysis leaves us with a choice between the lesser of two evils. We can choose Alternative 2 that keeps development and growth out of vulnerable communities, but will drive up housing prices across the city or we can choose Alternatives 3 or 4 which spread out development, but only into our most vulnerable communities.”<sup>i</sup> That comparison may be overdrawn (and the rest of this writer's analysis is more nuanced) but at least it focuses readers' attention on the right issues.

The Equity Analysis, like the growth alternatives in their own right, can be more thoroughly integrated into the rest of the Comprehensive Plan. As our commentaries on later chapters suggest, the plan does not yet say enough about the areas with high displacement risk and/or low access to opportunity in which neighborhood-stabilizing and neighborhood-enhancing public investment will need to be directed, or the strategies by which equity criteria will guide that investment. Making that connection will go a long way to showing how the plan can be a blueprint not just for growth management but for the overall operations of the City.

The Urban Village typology is based on physical characteristics of places, but its implementation has direct impact on the social characteristics of communities. The Equity Analysis is a start at bridging that gap. The Equity Analysis and Resolution 31577 are reminders that the Urban Village Strategy (UVS) could more fully

address race and social equity issues in its desired vision and outcomes, conceptual framework, use of shared definitions of terms, performance measures, and growth targets by urban village/center.

#### Outcomes and Vision:

The UVS is consistently characterized as directly impacting three core values (community, environment and economy) but only indirectly influencing the fourth core value (race and social equity). This minimizes the role growth has (or could have) in directly achieving equitable outcomes. This lack of emphasis on the race and social equity value is demonstrated by the omission of the major equity issues raised by the Growth and Equity Analysis in the five purposes or four stated outcomes of the Strategy. In fact, the Urban Village Strategy has two purposes that may be problematic from a racial equity perspective:

- 1) “Promotes the most efficient use of public investments, now and in the future”. This depends on our understanding of efficiency. Many racial disparities require public investments that may not be defined as “efficient” from a short-term financial perspective but are necessary to correct historic inequities.
- 2) “Retains the character of less dense single-family neighborhoods outside of urban villages”. Many single-family neighborhoods with high access to opportunity and low displacement risk remain out of reach for low-income households of color because of their high cost of housing. Moderate growth in these areas to increase inclusion would appear to align with Seattle’s race and social equity values.

The UVS could include a purpose of promoting equitable development as defined by the resolution and a new desired outcome to minimize displacement and increase access to opportunity for marginalized populations. Additionally, it appears the resolution’s direction to include the Principles of Equitable Development in the introduction and the definition of “Race and Social Equity” in the core value has not yet been included. Having these shared definitions understood by all is critical to implementation of the CPU’s equity goals and policies.

A Note on Early Implementation: If it is possible to deploy a near-term (0-3 year) public investment strategy, to be rolled out concurrent with the adoption of the CPU, this would go a long way toward establishing the nexus between the growth plan and the operations and capital spending priorities of the City. Best practices for implementation to operationalize an equity policy framework are detailed below.

#### Specific Policy Recommendations:

##### **Planning for Growth**

*New Equity Policy for GS1:* Monitor development activity in areas with high access to opportunity and the extent to which marginalized populations are accessing new opportunities in these areas.

##### **Urban Village Strategy**

Strengthen Existing Equity Goal and Policies:

GSG2 - Accommodate most of the city’s housing and employment growth in designated urban centers and urban villages and look for ways to achieve equitable outcomes for all of the city’s residents.

*Strengthen:* Replace equitable outcomes with equitable development as defined in Resolution 31577.

- GS2.9 - Use zoning and other planning tools in places where growth and development are expected to shape the amount and pace of growth in ways that will control displacement of marginalized populations, community services and institutions.

*Strengthen:* Also refer to culturally relevant commercial businesses.

- GS2.13 Support convenient access to healthful food for all areas where people live by encouraging grocery stores, farmers’ markets and community food gardens. Encourage these food options to be culturally relevant and affordable.

- GS2.14 Allow commercial activity in residential urban villages that supports the overall residential function and character of the village. Consistent with overall City goals for economic development, this kind of commercial activity should include living wage career path jobs with low bar to entry for marginalized populations.
- GS2.15 - Promote meaningful choice for marginalized populations to live and work in urban centers and urban villages throughout the city.  
*Strengthen* – Be explicit about the City’s role in using zoning and planning tools to increase marginalized populations choices to live in areas with high access to opportunity.

New Equity Goal and Policies:

*New Goal:* New growth meets the needs of marginalized people and reduces disparities, taking into account past history and current conditions, so that quality of life outcomes are equitably distributed for the people currently living and working here, as well as for new people moving in.

- *New Policy:* Strive to eliminate known race and social disparities by addressing the inequitable distribution of opportunity throughout the city that limits marginalized populations ability to reach their full potential.
- *New Policy:* Coordinate planning and community development investments in areas with high displacement risks to support marginalized communities as their neighborhoods experience changes in their demographics, built environment, and real estate markets.
- *New Policy:* Quantifiable indicators of equitable growth will be measured over time and reported annually as part of the City’s ongoing monitoring of the Plan’s effects on race and social equity over time. Equity measurements will track growth and displacement issues and be disaggregated by race, ethnicity, and income when possible.

**Distribution of Growth**

Strengthen Existing Equity Policies:

- GS3.1 Encourage residential growth in places around the city that are conducive to compact, well-served urban living, including opportunities for families and low-income households.  
GS3.2 Increase employment growth in areas that are convenient to the city’s residential population as a way to promote walking and transit use and to reduce work commutes. Consistent with overall City goals for economic development, this growth should focus on high quality employment, with the education and training needed for marginalized populations to fully participate in the economy.
- GS3.4 Base 20-year growth estimates for each urban center and manufacturing/industrial center on:
  - Potential benefits and burdens for the city’s marginalized populations*Strengthen:* Specify the burdens as displacement pressures and the benefits as increasing access to opportunity.

New Equity Goal and Policies:

*New Goal:* Achieve a distribution of growth that eliminates race and social disparities by growing great neighborhoods throughout the city with equitable access for all and community stability so growth occurs without displacement.

- *New Policy:* Encourage more affordability and variety of housing types in urban centers and villages that have high access to opportunity.

- *New Policy:* Distribute public investments equitably to address current inequities, fostering growth in neighborhoods that do not have the basic needs people require to reach their full potential.
- *New Policy:* Increase growth in middle-income jobs and educational opportunities in areas that are convenient to marginalized populations as a way to promote economic mobility and reduce commutes.
- Track growth rate of housing unit size and affordability levels, as well as the growth rate of jobs across income quintiles.

### Recommended Measures

- Performance Measures: Current performance measures include housing and employment growth without considering key equity issues like housing affordability or the quality of the jobs or their geographic location, if not also degree of accessibility by transit. As we understand it, we agree with the Mayor’s proposal to develop equity performance measures with the Planning Commission to track annually whether the city’s is growing equitably or not. We recognize that these are dimensions of housing and jobs that were not traditionally included in this type of growth analysis, but they are central to an overall equity-focused plan.
- Growth Targets: The current growth alternatives do not fully reflect the framework and data provided by the Growth and Equity Analysis. We recommend developing a growth scenario that increases access to higher opportunity areas and mitigates private market growth in areas with high displacement risk, recognizing that these goals will not be easy to accomplish.
- Tracking population change in the city and county: It will be important to track with as much detail as possible the populations of the City of Seattle and surrounding areas and jurisdictions of King County, with respect to the composition of neighborhoods by race and ethnicity, age, family composition and other factors associated with growth, displacement and disinvestment. Ideally, tracking moves in and out of the City can be analyzed in close enough to real time to be able to assess trends if not the consequences of housing market trends and policies. Tracking housing values is similarly important for understanding the patterns of change and possible displacement.

## Land Use

### Analysis

The land use element serves as both the skeleton, a central organizing framework for the diverse issues and topics of the Plan, and muscles that, when flexed, move the City to the next stages of its evolution.

The introduction to this element plays an important role in acknowledging important connections and reaffirming desired outcomes and levers. In the introduction, “building community” is stated early on as a priority, although there is not clarification of what the success for this might look like or what achieving it would entail. Beyond this, there is almost no mention of the role of equity in land use (or land use in equity) and or how the development or content of this element might realize benefits for low-income people, communities of color, and other marginalized populations. Likewise, there is little discussion of the interconnectedness between issues across the breadth of the comprehensive plan— health, economic opportunity, environment, etc. – and land use. Instead, the introduction delves fairly deeply into technicalities, regarding location, type, and size of new buildings and connections with zoning.

The policies and goals included in the land use element follow the tone set forth in the introduction. There are many opportunities to address equity issues related to transportation, housing, community development, health, and other issues through land use. The policies that are listed here are among the most important for ensuring that Seattle grows equitably in the next twenty years.

In the next revision of the comprehensive plan, we advise that the City take greater care to address interconnectedness of issues influenced by land use decisions, and to elevate equity throughout.

### Specific Policy Recommendations:

The land use goals and policies are divided into three categories: (1) citywide, (2) by land use type, and (3) by neighborhood. For all of these categories, the City’s land use map plays a central and important role. Because of our limited exposure to and understanding of current local political and geographical dynamics across neighborhoods and various parts of the city, our recommendations remain general and limited to best practices.

#### (1) Citywide goals and policies

- LU1: Strengthen this goal by including an explicit discussion of the needs of low-income people and communities of color. Include considerations related to promoting health equity, minimizing displacement and increasing access to opportunity.

#### (2) Goals and policies by land use type: covers uses and special uses, development standards, parking, and incentives.

- LU2: Strengthen the existing language for this goal by specifying that “diverse” under bullet 3 refers to both racial and economic diversity.
- LU2: Include a specific bullet in the goal around land use requirements for affordability. Inclusionary mechanisms, infill development incentives, commercial linkage strategies, and developer exactions are all land use-linked mechanisms that help to ensure that housing production keeps pace with economic growth and that benefits low income people and communities of color.

- LU2 should include goals that encourage growth of middle-income jobs by expanding the types of businesses permitted to locate within the urban villages and urban centers.
- *New Policy*: Ensure land use codes encourage production, distribution and repair of businesses located within urban villages and urban centers.
- LU2: Stem displacement by introducing a new policy to require land use planning processes to minimize displacement pressures on marginalized populations and increase access to high areas of opportunity to low-income communities and people of color.
- LU2: Stem displacement by introducing a new policy that encourages zoning decisions to increase the supply and variety of housing types
- LU2: Develop a new policy to prioritize land use policies that incentivize private market housing that serves a range of incomes and household sizes in areas where established zoning policies limit those options.
- LU2.8: Strengthen this specific sub-goal by changing “certain groups or individuals to “marginalized populations.”
- LU2: Introduce new policies that encourage private commercial investors and developers to implement local hire policies, provide apprenticeships, offer job training, and create pathways to employment for marginalized populations
- LU3 is vague and leaves lots of room for interpretation; the subsequent policies could state more about process and community leadership.
- LU4: While it is encouraging to see public health considerations named directly here, the goal could be strengthened by providing greater specificity on the types of desired public health outcomes.
- LU5: should include greater considerations of public health and equity, akin to the recommendation in the prior bullet.
- How does LU6 relate to the urban village strategy? How do these policies relate to goals and aspirations related to walkability, bike-ability, transit, and other modes of transportation?
- Considerations related to low-income people, communities of color, and other marginalized groups should be specifically named in LU7.
- LU7.2 should be strengthened to prioritize other needs of marginalized populations, including culturally specific business districts and cultural anchors. Policies toward this aim should also be linked with high quality jobs, job training, education, and apprenticeships.
- In LU8, require systematic consideration of low-income people and communities of color in decisions affecting access to jobs, access to transportation options, and access to healthy foods in single-family residential areas.
- In LU9, include mechanisms to preserve affordability in multifamily residential areas undergoing development.

- Ensure that land use requirements related to commercial and industrial developments promote equity by including requirements for local hire, apprenticeship, job training, and pathways to careers in LU10 and LU11.
- LU14 should be strengthened to encourage major institutions to explicitly consider and provide mechanisms for economic mobility for marginalized populations, particularly those located in proximity to the institution.
- LU14.4 should include stronger language that either incentivizes or requires community involvement, and specifically calls out the inclusion of marginalized populations in these processes. Citizen’s advisory committees should be structured for inclusion over time.
- LU14.6 should be adjusted to allow the MIO to modify underlying zoning provisions and development standards, with consideration to impacts on marginalized populations and input from citizen’s advisory committees including representatives of marginalized communities.
- While reducing number of vehicle trips, LU14.14 should also seek to increase safe, affordable transportation options, by increasing transit and active transportation options in the area.
- LU14.15 should include stronger language about what comprises acceptable expansion for acceptable demolition, particularly for marginalized populations inhabiting those places.
- The master plans referred to in LU14.16 should also:
  - Include required community benefit agreements that include local hiring goals and WMBE goals in the construction and operation of the institution.
  - Include required shared value local economic development plans that address the needs of marginalized populations.
  - Require provision of affordable housing when plans lead to housing demolition or employment growth (per H5.18)
  - Be subject to racial equity analyses and mitigations prior to adoption.

Goals for development in specific neighborhoods include Downtown Areas (LU12), Location-Specific Neighborhoods (LU13), Stadium District (LU15), Historic Districts and Landmarks (LU16), and Environmentally Critical Areas (LU17). We are not commenting on these goals and recommendations, as these include specifics related to the character and priorities of these neighborhoods with which we are not acquainted.

Recommended Measures

1. % policies adopted that included racial equity assessments or analyses
2. % implementation measures pursued that involved input from partners across multiple agencies and community members representing marginalized populations

## Transportation

### Analysis

The transportation element creates a framework for integrating land use, transportation, the economy and growth. It's introduction could be strengthened by framing the ways that transportation can address equity through ensuring that high poverty neighborhoods with greater rates of transit dependent riders and fewer jobs are well-connected to job centers; that transportation service scheduling corresponds to shift changes in major lower-wage employment sectors; that capital investments and procurement power of the City's transportation agencies are oriented toward the most robust and inclusive contracting and hiring goals with firms and workers of color; and that affordable transit costs and housing located near transit together reduce the housing-transportation cost burdens for lower-income residents. It should also call out role that a well-integrated and efficient transportation system plays in addressing climate change by reducing vehicle miles travelled, and emissions exposures of vulnerable populations.

### Specific Policy Recommendations:

Beyond the introduction, some additional goals could strengthen the equity focus of the element:

- TG1 would benefit from a new goal: A connected transportation system that provides equitable access and mobility to everyone, regardless of race, ability, or means. Additional policies in this section could include:
  - *New Policy:* Prioritize transit service to meet the diverse transportation needs of marginalized populations.
  - Policies and investments are informed by engaging marginalized populations in their planning, implementation, and evaluation.
  - Provide equitable levels of transportation service by accounting for existing community conditions, including the impacts on displacement risk and access to opportunity of marginalized communities brought by new transportation investments.
- The section 'Encouraging the Use of Transportation Options' has good equity goals and policies, and could be strengthened by adding additional policies to the TG 3 'Meet people's mobility needs by providing equitable access to, and encouraging use of, multiple transportation options:'
  - Make transit services affordable to lowest income residents through delivery of fare discount programs.
  - Eliminate transportation commute time disparities experienced by residents of color and transit-dependent residents.
- The 'Support a Vibrant Economy' T5.8 Increase efficient and affordable access to jobs, education, and workforce training to promote economic opportunity' could be strengthened by prioritizing transportation access for those marginalized communities experiencing disproportionate rates of unemployment. Additional policies in this section could include:
  - Leverage public investments and agreements with private transportation providers and vendors to create training and living wage job opportunities, particularly for low-income and local residents of color, in planning, design, construction, and operations.
- In 'Safety', T6.3, strengthen :
  - Address safety policies and investments by engaging marginalized communities in their planning, implementation, and evaluation.
  - Ensure education measures are culturally appropriate and accessible

- Provide opportunities for marginalized communities to participate in auto-trip reduction programs
- Strengthen Existing Equity Policy T10.6: Prioritize investment by considering life-cycle costs, safety/risk, environmental benefits, ability to reduce GHG emissions, benefits to public health, and effects on racial and social equity.

#### Recommended Measures

- Reduced commute times for communities with higher proportions of transit dependent residents.
- Improved alignment of transportation schedules and shift schedules of lower income workers.
- Reduced transportation cost burden on low income, transit-dependent riders.
- Improved transit access between higher poverty neighborhoods and key services: healthy food, health clinics, job centers, schools.

## Housing

### Analysis

Overarching principles should stand out in the introduction to this element that mirror the Seattle Housing Affordability and Livability Agenda (HALA): more affordable housing; more resources; more support; more innovation. This introduction should specifically tie these principles to promoting stabilization of current residents; realizing permanent affordability of any affordable investments realized; increasing access of lower income families to higher opportunity neighborhoods; serving communities of color equitably with housing resources; and making housing and infrastructure investments that improve substandard disinvested neighborhoods. This element of the report alludes to equity goals and policies in the housing arena, however, there is room for a more substantial sense of urgency and *regulatory action* in advancing these goals as recently delineated in the HALA Agenda. For example, much of the language is too passive: instead of “encourage” or “consider,” it should “prioritize,” “require,” or “align with adopted HALA goals.” The introduction would also benefit by a data baseline that identifies housing need and disparities in housing security by race and income, to set context for the goals and policies that follow.

Policies to overcome NIMBYism related to density and cross-jurisdiction shared affordability goals should be woven throughout the chapter, such as up-zoning near key urban village centers and intermodal transit hubs. The Planning Department should articulate a more proactive role in removing zoning obstacles that perpetuate exclusionary single-family home neighborhoods near key transit amenities or job centers. The element should also better integrate and discuss the pairing of infrastructure investment/amenities (active transportation, schools, libraries, parks, water, storm water, etc.) with affordable housing goals. It generally addresses the anticipation of growth in demand for housing, as well as expected displacement pressures on low income and communities of color. It could strengthen the nexus of first right to new housing for anyone facing displacement either from rising costs or redevelopment of property.

Tenant protections detailed in the Land Use Code should also be referenced and enumerated in this chapter. Given all the housing data available showing racial disparities in housing the plan should include goals to reduce the disparities by race in ownership rates, rental housing cost burden, and in areas of racially concentrated areas of poverty and affluence. The element should be more specific about who is vulnerable to displacement (the Equity Analysis and the introduction to the Housing Element both identify marginalized populations as being vulnerable to displacement. Further, the element should call out the need for culturally appropriate and inclusive methods of communication. For example, departments should engage marginalized populations in the development, implementation, and evaluation of affordable housing policies and programs in order to reverse known racial disparities. Lastly, it should name the intersection between new housing development and transit, state a goal of working to align them, and lower the combined costs for vulnerable populations.

### Specific Policy Recommendations:

#### **Equal Access to Housing**

- Strengthen Existing Policy H1.4: Seek ways to promote use of tenant-based rental assistance in compact, complete communities in greater parts of Seattle.  
*Strengthen:* Replace “compact, complete communities” with “communities with higher access to opportunity”; and add “for families with young children”

## Diversity of Housing

- Strengthen Existing Equity Policy HG3: Considering allowing additional housing types that respect existing neighborhood character in single-family areas, particularly within or near urban centers and urban villages.
- *Strengthen*: Develop multifamily affordable housing options that respect existing neighborhood character in single-family areas of high opportunity within or near urban centers and urban villages.

## Affordable Housing

- Strengthen Existing Equity Goal and Policies for HG5:
  - H5.9 Address the needs of communities most vulnerable to displacement due to redevelopment pressure through policies and funding decisions related to extremely low-, very low-, and low-income housing.  
*Strengthen*: Specifically call out marginalized communities, protected classes, and extremely low to low income housing.
  - H5.12 Require neighborhood notification when agencies apply for City funding for rental housing preservation and production projects and provide guidelines for effective communication between housing owners and neighbors.  
*Strengthen*: Edit this policy to not seemingly promote NIMBY action, and call out the need for culturally appropriate and inclusive methods of communication. Maybe: “Cultivate neighborhood acceptance of affordable housing preservation and new construction through use of culturally competent facilitation, arts and culture, and communications and effective enforcement of fair housing law.
  - H5.14 Seek to reduce the number of Seattle households who are burdened by housing costs by supporting the production and preservation of affordable housing for extremely low-, very low-, and low-income households.  
*Strengthen*: Target this policy to “Seek to reduce the housing cost burden disparities experienced by Seattle residents of color”. The data illustrating this disparity is provided in the intro to this element. A policy can respond to the problem identified.
- New Equity Policies for HG5
  - *New Policy*: Align affordable housing investments and policies with infrastructure investments that increase the quality of life of disinvested neighborhoods, especially transit investments.
  - *New Policy*: Engage marginalized populations in the development, implementation, and evaluation of city-wide affordable housing policies and programs.

## Recommended Measures

- Reduction of disparities by race in ownership rates and housing cost burdens.
- Increase in residential integration by income, race and ethnicity
- Successful rehousing of low income residents in higher quality homes due to redevelopment-induced displacement (with measure disaggregated by race)
- Quality of life infrastructure investments made in lower cost neighborhoods to support housing.

## Capital Facilities

### Analysis

It appears that most of the relevant categories of equity goals and policies are covered in this draft, albeit at a high level of generality. The discussion makes the appropriate reference to equitable distribution of services and facilities and to the need for the capital plans to dovetail with the growth strategies, which themselves need to be equity-driven. The element does not address the contracting and workforce inclusion strategies that have been shown to direct employment and business opportunities to lower income communities and thereby help to reduce economic disparities. A new policy could be developed to leverage investments and agreements with private vendors to create training and job opportunities, particularly for marginalized populations and local residents. The heart of the matter lies in the next level of detail, not shown here: operationalizing the definitions and measurement of equitable distribution of facilities and services.

### Specific Policy Recommendations:

#### **Strategic Investment**

- **CFG1 Develop and manage capital facilities to maximize the long-term environmental, economic, social, and health benefits for residents of all backgrounds and communities, of public investment, land, and facilities.**
- CF1.1 Assess the policy and fiscal implications of potential major capital facility investments as part of the City's capital decision-making process. The evaluation should include consideration of a capital project's:
  - contributions to an equitable distribution of facilities and services, accounting for existing community conditions, considering how decisions will impact marginalized populations
- New Equity Policy for CFG1
  - Leverage capital investments and agreements with private vendors to create training and living wage job opportunities, particularly for marginalized populations and local residents.

### Recommended Measures

- As the targeted workforce and contracting strategies tied to capital investments are enacted, their outcomes should be fully tracked and reported.

## Utilities

### Analysis

The Introduction outlines specific services and resources provided by private and public entities throughout the city of Seattle, and mentions how fundamentally important utilities are to a community, but it does not make the connection to the socioeconomic benefits it provides: Investments in this sector provide the foundations necessary to create housing, transit, and other infrastructure, which play key roles in the city and regional economy and in communities' access to opportunity. The summary should address the leveraging of utilities investments to strengthen communities of color with low access to opportunity. This will give framework and context to the strong goals and policies of the element.

The Service Delivery subsection should also comment on whether or not higher poverty communities are less resourced than others, and if so, how the City can prioritize them through systems like the budgeting process. In reference to Utility Resource Management: Climate change issues are acknowledged, however, the analysis should go further to address specific vulnerabilities that Seattle faces, such as rising sea level and earthquakes which marginalized populations are less resourced to respond to. It also mentions considerations for future utility facility design and location, but more proactively, it should conduct an equity analysis of *current* facilities for the environmental justice impacts they may have on communities today. A new policy directing use of equity analyses should also serve to guide the mitigation of the identified environmental burdens on marginalized populations.

And finally, Seattle Public Utilities has played a leadership role in developing a “Strategic Framework: Environmental Justice and Service Equity Division 2015-2018” that should be cited and referenced as foundational to this element.

### Specific Policy Recommendations

#### **Service Delivery**

New Equity Policies for UG1:

- *New Policy*: Establish goals to mitigate or reduce the historic concentration of large polluting industries and utility operations in low income, racially diverse communities.
- *New Policy*: Periodically analyze current facilities and services for the environmental justice impacts they may have on marginalized populations and mitigate any identified impacts.

#### **Utility Facility Siting and Design**

- *New Equity Policy for UG3*: Analyze whether marginalized populations are resourced to withstand future climate conditions through the siting and design of facilities.

### Recommended Measures

- Environmental justice impacts of utilities on communities of color are mitigated and reduced
- Increased workforce participation and procurement of firms for utilities design, build, and operation from marginalized communities
- Reduced utility service standards and capital investment disparities in communities of color.

## Economic Development

### Analysis

In the general terms used in this draft of the Plan, the Economic Development chapter hits most of the right notes and makes copious references to the need to develop the city in a way which creates living wage jobs that are accessible to marginalized populations.

There is a section within this element on Workforce, and it is too brief and general to have the necessary impact. While it mentions three large and important policy areas (training, racial/structural barriers to employment, and living wages), these are very brief statements of intentions, not conveying a sense of what should change from the status quo to realize them more completely. It's not clear that the document is intended to have more specificity, but the CPU is an appropriate place to be more specific. This section is a good location to tie together the workforce inclusion policies –for the City and its contractors and vendors -- in elements such as Utilities, Transportation, Parks, and Capital Facilities. This element could also be strengthened by new policies to coordinate workforce strategies targeting priority sectors with place-based planning and community development initiatives designed to operationalize the Urban Village Strategy.

The other subsections of Economic Development, including “Industry Clusters” and “Entrepreneurial and Small Business Development” would be strengthened by including more direct reference and cross-reference to workforce inclusion policies and strategies, to tie the whole section together. We suggest several such possible policies below, either as new goals and policies or amendments to the language of current ones.

### Specific Policy Recommendations

#### **Commercial Districts**

New Equity Policies:

- *New Policy:* Address the needs of culturally relevant businesses most vulnerable to displacement due to redevelopment pressure through policies and funding decisions.
- *New Policy:* Ensure that City strategies for community revitalization help meet the needs of marginalized populations in multi-cultural business districts where small businesses are at risk of displacement due to increasing costs.

#### **Industry Clusters**

New Equity Policies:

- *New Policy:* Support industry clusters to have a workforce that is representative of Seattle’s racial and socio-economic groups.
- *New Policy:* Encourage industry clusters to grow and expand in low-income communities to train and hire local residents.

#### **Business Climate**

- EDG3 - Encourage a business climate that supports new investment, job creation, and resilience, and that values cultural diversity and inclusion.
- *New Equity Policy for EDG3:* Assess new taxes, regulations, incentives, and other government policies and investments to determine the benefits and burdens on marginalized populations

#### **Workforce**

New Equity Policies for EDG4:

- *New Policy:* Explore opportunities to coordinate community development activities with place-based workforce development opportunities in communities with high unemployment rates.

- *New Policy*: Target policies and programs to reduce disparities in Seattle’s unemployment rate.

### **Entrepreneurial and Small Business Development**

- *New Equity Policy for EDG5*: Identify and eliminate the barriers to starting and operating small businesses faced by marginalized populations, especially immigrants and refugees.

### Recommended Measures

- Tracking of standard workforce development performance metrics such as completion of training, placement, and retention in employment, but disaggregated for relevant categories of race, gender, age, disability, veteran’s status, record of incarceration and other features. Maintaining tracking of employment retention as long as is practical, ideally longer than many basic federal requirements.
- Mapping the area of residence for workers in firms assisted by these strategies or placed through City-supported workforce programs.
- Tracking of the number, type and location of businesses assisted by the various industry clusters, small business and other strategies to support firms.
- Tracking of the changes in employment for the firms supported by these strategies, disaggregated as thoroughly as possible.

## Environment

### Analysis

The Environment Element is introduced as a cross-cutting element that has implications for all aspects of the city's growth and development. However, aside from a few statements regarding general relationships to other elements, there are no direct linkages drawn between the goals and policies outlined and levers in transportation, housing, land use, and so on. This element would be strengthened significantly by providing specifics regarding the types of levers available in different elements to achieve environmental priorities.

Most, if not all, of the language used in this element reads as aspirational, with phrases such as "seek to" and "strive to," rather than "will" or "shall." Providing clearer definitions of terms used, such as what constitutes "healthy aquatic systems," and for whom, as well as stronger commitments – both through specific targets and stronger legal language – will promote equity by demonstrating the City's commitments and accountability.

The direct discussion of equity in this element is limited to a paragraph in the introduction and policies related to climate change. To strengthen the links between the goals and policies in this element and the communities that will benefit from an equity approach, the authors of this element could reference the needs of specific groups, and/or how the guidelines could affect or be affected by various urban growth strategies.

This element lacks equity goals. Strong goals could be co-developed in partnership with environmental justice organizations and community leaders. Some of these could focus on reducing the exposure of vulnerable communities to toxins and contaminants, which could be useful in tracking the City's environmental justice work over the life of the plan.

The discussion of land, water, and climate policies should be expanded to include a discussion of natural weather occurrences, drought, and other major changes that are possible in the upcoming decades.

The climate section would benefit from a review of the economic development impacts of climate change on low-income communities and people of color. Goals and policies should not only ensure that vulnerable populations are protected from potential climate impacts, but also that they benefit from necessary mitigation strategies. For instance, efforts to outfit households with "green" energy sources, such as solar and wind, are typically high cost and not accessible to low-income people. As more affluent communities go "off the grid," the City must make plans to ensure that low-income communities and communities of color retain access to affordable energy as the energy environment changes around them. In addition, policies should prioritize low-income people and communities of color in green industry development, offering training and local or even first hire for new jobs produced in the green economy.

### Specific Policy Recommendations

Given the analysis above, it is recommended that two major actions take place in the update of this element:

- Include specific references to any documents or policies with oversight by City agencies on the topic of Environment.
- Update the existing language in this element to address issues outlined in the analysis above. Address any specific issues pertaining to how other documents or policies pertaining to Environment will be updated or reviewed in a congruent manner.

### Recommended Measures

Process measures that capture inclusion of equity analyses in the development and implementation of new policies, such as level of interagency collaboration and community engagement, can be considered here.

## Parks and Open Space

### Analysis

The Parks and Open Space Element has references to the needs of all the components of a diverse population, and recognition that as the city is largely built out, expansion of park space will be rare—though increasingly, cities are turning former industrial uses and construction landfills to park use. The Plan does not appear to make choices or set priorities for operations or capital budgeting, but to simply list all the worthy objectives of a complete parks and recreation system. Absent further information about the pressing issues and vocal constituencies, it would be hard to see what the critical choices would be. Resolution 31577 provides direction to include a policy for provision of capital investments and services that addresses racial disparities. Reducing health disparities through greater access to open space and recreational activities could be a goal of this new policy. This element also omits a policy related to the contracting and workforce inclusion policies that have proven so effective in reducing racial and economic disparities.

Baseline data about current access to parks and open space by neighborhoods, race, and income would provide an important baseline in this introduction. Specific equity language that identifies principles of ensuring equitable access to parks and open space for marginalized communities should be added.

### Specific Policy Recommendations

#### **Distribution of Parks and Open Space**

- *New Equity Policy for PG1:* Use capital investments and services to reduce health disparities through greater access to open space and recreational activities.
- *Strengthen PG1.1:* Specifically name communities of color and low income communities.
- *Strengthen PG1.3:* Prioritize investments in connected networks of active transportation and open space for marginalized communities

#### **Maintaining Park Facilities**

- *New Equity Policy for PG3:* Look for innovative ways to approach construction and major maintenance activities to leverage investments and agreements to create training, apprenticeships, youth employment, and living wage job opportunities for marginalized populations, local residents, and disadvantaged and women owned firms.

### Recommended Measures

- Reduced disparities by race and income in open space and park access

Increased engagement of disadvantaged populations in green space design, build, maintenance and programming (including process, workforce, and contracts).

## Arts and Culture

### Analysis

The Arts and Culture chapter does a good job in naming equity-focused goals and policies, but could be strengthened by specifically identifying actions in the introductory portion of each segment of the plan focused on actions in communities of color. For instance, in the 'Public Art' discussion, specifically call out ensuring equitable investments in public art in communities of color; prioritizing city-wide commissions from artists of color; ensuring public art represents the cultural representation of communities of color.

In the Creative Economy segment, the plan should specifically mention ensuring that tourism and economic development investments highlight and expand the assets of communities of color; Prioritizing Creative Economy activities in communities of color can be a key place to demonstrate equity investments in growth. In Youth Development, the plan could prioritize investment through a progressive funding formula in schools or youth programs in high poverty, high violence, or poor school performance situations. In Cultural Space and Placemaking, call out prioritizing investments in cultural performance and gathering spaces for communities of color that have significant disparities in use, access, ownership and endowment by communities of color.

Additionally, two policy recommendations in the PolicyLink Arts, Culture and Equitable Development framework that would bring crosscutting capacity to the Comprehensive plan include the following:

- Incorporate arts and culture into transportation planning and implementation, especially around transit stations, transit oriented development and transit stops.
- Create strategic open space (such as transit plazas) and park plans or renovations that serve communities of color and recognize parks as inherent expressions of culture as well as venues for expression.

### Specific Policy Recommendations

#### **Historic Preservation**

- Strengthen Existing Equity Policy AC5.2: Consider the use of conservation districts to recognize and sustain the character of unique residential or commercial districts.  
*Strengthen:* Augment this policy with the language rather than 'consider' to "Prioritize" and end "with high risks of displacement".

### Recommended Measures

- Reduced disparities in investment in public art, arts commissions, cultural venues, and arts and culture programming in communities of color and by artists of color.
- Increased access to arts and culture education, programming and youth employment for youth of color.
- Increased use of artists and cultural processes to engage marginalized communities in community design and implementation practices.

## Community Well-Being

### Analysis

The introduction provides important language to set the vision and goals for community well-being in Seattle, and demonstrates an understanding of the relationships between the social, educational, service, and physical environments and community health. However, it assumes a level of understanding of these relationships that might not be true of the reader. It would be important to include up front in the introduction definitions of several key terms, including the basics (e.g., health, well-being) as well as more nuanced terms named in some of the goals (e.g., “sense of belonging”).

The rationale for why health equity is a priority in this Comprehensive Plan Update is not clear. Specific data and information regarding health inequities, and the potential health impacts of the various growth scenarios should be incorporated into the introduction. These analyses can take on multiple forms. Tables and graphs that illustrate city health data disaggregated by race and income can reveal priority health issues and concerns. Maps that illustrate epidemiological patterns, and their relation to race and income, can point to areas of particular need. There is a large volume of material available on mapping health equity, and local health departments are an important resource. Health Impact Assessment (HIA) is also a valuable tool for determining the potential results of development decisions. These can be commissioned by private or public entities.

Given the vast body of work pursued by health advocates in the public, philanthropic, and even private sectors to advance healthy eating, it is surprising to see such thin introductory framework, goals, and policies on “access to healthy foods.” A more comprehensive approach would address issues related to access to healthy foods at multiple scales within a municipality, ranging from the economic development levers that influence where healthy food outlets are located to physical environment factors, such as transportation and safety, that influence how and whether individuals are able to access those opportunities.

Akin to the prior comment, the discourse regarding “active living” has grown over the past decade, and spans the fields of public health, transportation, planning, and economic development. If active living in any of its forms – including increasing walkability and bikability – are important priorities for the Urban Village Strategy, there should be reference to this in the Plan, and certainly in the Community Well-Being element. Because achieving health equity goals requires activating numerous levers across multiple elements, it is critical to ensure that the goals and shared policy strategies are consolidated and clearly stated within one element.

### Specific Policy Recommendations

Given the analysis above, it is recommended that two major actions take place in the update of this element:

- Include specific references to any documents or policies with oversight by City agencies on the topic of Community Well-Being and Public Health.
- Update the existing language in this element to address issues outlined in the analysis above. Address any specific issues pertaining to how other documents or policies pertaining to Community Well-Being and Public Health will be updated or reviewed in a congruent manner.
- Draw ideas and examples from exemplary health equity elements from across the country, such as Richmond, California’s Health and Wellness Element.

### Recommended Measures

Process measures that capture inclusion of equity analyses in the development and implementation of new policies in this element, such as level of interagency collaboration and community engagement, can be considered here.

## Glossary

### Analysis

#### Specific Recommendations

##### Strengthen Existing Equity Terms:

**Displacement:** The involuntary relocation of residents from their current residence. Direct displacement is the result of eviction, acquisition, rehabilitation, or demolition of property, or the expiration of covenants on rent/income restricted housing. Indirect displacement occurs when residents can no longer afford escalating rents or property taxes. Businesses can also be impacted by physical and economic pressures.

*Strengthen:*

- Displacement also affects community and cultural institutions.
- Displacement occurs due to institutional and systemic factors, not just rent increases.

**Social Equity:** Fair access to livelihood, education, and resources; full participation in the political and cultural life of the community; and self-determination in meeting fundamental needs.

*Strengthen:* Define as “Race and Social Equity” and integrate the current definition with the definition provided in Resolution 31577. “The time when all marginalized people can attain those resources, opportunities, and outcomes that improve their quality of life and enable them to reach their full potential”

- **Livability:** Livability is the sum of the factors that add up to a community's quality of life— including the built and natural environments, economic prosperity, social stability and equity, educational opportunity, and cultural, entertainment and recreation possibilities.

*Strengthen:* Refer to race and social equity

##### New Equity Terms:

- **Marginalized People:** Persons and communities of color, immigrants and refugees, those experiencing poverty, people living with disabilities, and people identifying as LGBTQ. These are communities who are systematically blocked from (or denied full access to) various rights, opportunities and resources that are normally available to members of a different group, and which are fundamental to social integration within that particular group (e.g., housing, employment, healthcare, civic engagement, democratic participation, and due process).
- **Equitable Development:** Public and private investments, programs, and policies in neighborhoods to meet the needs of marginalized people and reduce disparities, taking into account past history and current conditions, so that quality of life outcomes such as access to quality education, living wage employment, healthy environment, affordable housing and transportation, are equitably distributed for the people currently living and working here, as well as for new people moving in.

## Conclusion

The CPU Update and its accompanying documents are, as we noted at the outset, more consciously and thoroughly focused on issues of social and economic equity than the comparable efforts of almost all other cities, and it is with that recognition and appreciation that we offer these observations and recommendations for revising it in ways that will complete the ambitious task the City has set for itself. The best plans are those which not only project a positive and ambitious vision for a city but which delineate the connections that can be made between goals and actions in all the domains of municipal government. Seattle is breaking new ground in both respects, the vision of an equitable, growing, prosperous city and the means to achieve it.

# Part II. Recommendations for Advancing Equity through Implementation of the 2016 Comprehensive Plan

Creating a comprehensive plan imbued with equity-based values, principles, criteria and strategies is a substantial job in and of itself, but putting that plan into practice calls for a whole additional set of commitments and partnerships, and the efforts of staff from many departments of the City. In this second part of our report, we address the challenges and opportunities of implementation, drawing from instructive experiences in several other cities as well as from what we have learned about Seattle. After a brief introduction, we will describe those case study examples, and then introduce a four-part framework for thinking about implementation.

## Lessons on Implementation: National Examples

Seattle's leadership in the arena of equitable urban planning policy makes the search for suitable implementation examples a challenge. While more jurisdictions across the nation take the initiative to develop equitable urban policies and community plans, only a small number of cities are steps ahead of the rest, occupied with developing, testing, and refining their approaches to ensure their equity plans and policies make an impact. In our review of cities to profile, we identified an eclectic mix of agencies taking leadership on equity implementation, such as the San Francisco Public Utilities Commission, and cities like Sunnyvale, innovating around the implementation of comprehensive planning more broadly. In this series of case studies, we open with the City of Richmond, California, which is in the midst of implementing its health equity-focused comprehensive plan.

### Richmond, CA

Located east of San Francisco and north of Oakland, Richmond is a racially and socioeconomically diverse city with a storied social, economic and political history. A major oil refinery within city limits has long played a prominent role in local politics, serving as an influential business leader in the community, as well as a source of major concern among local environmental, health, and equity advocates. While City leaders have traditionally lent a sympathetic ear to refinery interests, the mood began to shift in 2008, when a Green Party mayor took office. Since that time, the City has made important strides to address the needs of its low-income residents and communities of color. A strong progressive alliance at City Hall has led to forceful attempts to address the foreclosure crisis, as well as a concerted effort to advance equity throughout the city's comprehensive plan, with staff dedicated to this goal. In the past decade, the City has prioritized a much broader approach to health equity, building on the general plan with the adoption of a "health in all policies" ordinance and the formalization of staffing structures and interagency partnerships.

Richmond began its General Plan update process in 2006, and was the first city in California to address issues related to health equity in its comprehensive planning policy. Additions related to climate and arts were also considered innovative at the time. The Plan was ultimately adopted in 2011, but not until after extensive planning and piloting of implementation projects across the city. (The delay in adoption was not due to issues with the health and wellness element). In this time between completion of the draft plan and its adoption, significant investments were made to develop City leadership, build staff capacity to understand and address

issues, and reach out to the community both directly and through existing partnerships with the County Health Department, the School District, and other entities.

Today, the City is deep into its implementation process, having tried and tested initial strategies for interdepartmental communication, budgeting, and measurement. Multiple ordinances and efforts are under way, putting Richmond at the forefront of state efforts to incorporate health equity in all policies. The City Manager, the Mayor and Council have endorsed a process by which measures of health equity are an essential component of how the City organization assesses its effectiveness. The Manager's Office leads interdepartmental strategies for improving neighborhood services based on principles and concepts of health equity, a process begun during the general plan update. Community-based strategies to prevent gun violence have had a measurable effect. Many of the residents who first became engaged in these neighborhood strategies during the general plan process are still involved.

### San Francisco Public Utilities Commission

The SFPUC is the first public utility in the nation to adopt Environmental Justice and Community Benefits policies. These two policies guide the Agency's long term plan, and bolster its efforts to be a "good neighbor" to all whose lives and neighborhoods are affected by the operation of its Water, Power, and Wastewater Enterprises. The policies direct resources and staff to achieve the following tangible goals: diverse and meaningful community engagement; use of land in a way that maximizes health, environmental sustainability, and innovative ideas; environmental justice; economic and workforce development; community health; arts and culture; and education programming.

SF PUC started with an ambitious long term plan and equity policies in 2009, focused on the environmental justice communities where their pumping stations and water treatment plants were located. They assigned experienced leaders of environmental justice and equity work to lead the endeavor. In an agency with a \$1B annual budget and 2,300 employees, they started off with five high-level staff to implement the equity goals of the plan.

This equity leadership started at the top of every department, enterprise or division within the agency, to understand their business model, priorities, and core responsibilities, and then co-developed pilot structures for the overall endeavor. The first year, they took on policy initiatives, budgets and staffing. This helped leaders and their staff understand goals, vision, and strategy for moving forward. Their 5-year work plan focused on *outcomes* of community benefits. They mapped disadvantaged communities for implementing capital projects, and developed software to analyze Triple Bottom Line of every project.

The San Francisco PUC took three years to fully realize equity implementation of its long range plan. Now capital projects are targeted to the highest poverty communities; and all enterprises of the utility apply their business services, apprenticeships, youth employment, and greening programs to core environmental justice communities. And budgets and staffing are increasingly dedicated to the equity endeavors.

They have dedicated \$1.8B in capital projects to the Bayview Hunter's Point community where their sewage treatment facilities were located in a historically African American community. The projects include community facilities like community college workforce development courses, arts and culture venues, and quality parks.

They partnered with other city agencies to meet their goals: they budgeted \$1.6M/year to the economic development department to run their construction trade training program; invested in the Department of Children, Youth and Families to manage their youth employment and internship programs; partnered with Parks and Recreation and with Public Lands department to do greening projects. They established an

evaluation system with the Controller's Office evaluating expenditures of SE Bayview projects and services, and contracted with UC Berkeley professor Jason Corburn to help model indicators and measures.

### **Lessons from "Reinventing the General Plan" – an exploration by the California Planning Roundtable.**

When the leading practitioners in planning generally concur that one of the field's traditionally most significant processes is systemically seriously flawed and out of touch, it would be a good thing to listen and search for ways to fix it. That was the case when, five years ago, the California Planning Roundtable, whose members included many of the most experienced local planning directors, consultants and academics in the state, agreed that city and county General Plans in the state were losing relevance, readability, policy focus and impact while also becoming impractically lengthy, litigious and expensive. The members took it on themselves to look for the positively peer-reviewed models which flowered amidst this malaise, and to use them as a basis for creating principles and informal guidelines for doing better plans. While there are some differences between comprehensive plans in Washington and general plans in California, the main lessons from this exploration of models and development of principles and guidelines is extremely relevant for Seattle.<sup>2</sup>

The CPR reviewers established a set of principles for what a general plan should achieve, deliberately stretching beyond the legalistic minimum and seeking a document and process which can "enable communities to build a motivating, yet attainable, vision of their future that is broadly shared and pursued." Toward this end they established ten principles. The first four, for example, are to Create a Vision, Manage Change, Make Life Better, and Build Community Identity, and examples from around the state of plans which excelled with an innovative process or especially effective result were described. The fifth principle is Promote Social Equity and Economic Prosperity, for which the text reads: "The Reinvented General Plan ensures that all groups enjoy the benefits of a healthy and prosperous community, with access to housing, transportation, jobs and commerce. It enables a variety of businesses to flourish." That principle is reinforcement for the approach that Seattle has taken.

The Roundtable's ninth principle brings us to our current topic: "Prioritize Action: The Reinvented General Plan is created and written to implement. It is the principal management tool driving budget priorities, public investment, and operational decisions for the community. Local government is held accountable for its successful implementation."

This connection between plans and coordinated action is a very basic concept but is anything but simple to execute consistently in a sizable city. Two cities which did very well in this respect, and which offer some useful lessons for Seattle, are Ontario and Sunnyvale.

#### Ontario, CA

Ontario is a city located in southwestern San Bernardino County, California, 35 miles east of downtown Los Angeles. Located in the western part of the Inland Empire region, the city is a center of warehousing and logistics, home to an international airport, and, for the LA region, relatively less expensive housing. As of the

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<sup>2</sup> Information about this project can be found at <http://reinventingthegeneralplan.org>. There are sections on Principles and Models, from which the material cited in the following sections are taken. The written material was supplemented with an interview in October 2015 with Elaine Costello, AICP, manager of the Reinventing the General Plan project and a member of the California Planning Roundtable. The interview was conducted by Victor Rubin of PolicyLink, who is also a member of the Roundtable.

2010 Census, the city had a population of 163,924, but the Mayor said in 2015<sup>3</sup> that with the available land, the demand for housing, and the strategies for growth, the population will eventually top 300,000. When the City and nearby localities gain control of Ontario Airport from the distant Los Angeles World Airports Authority next year, the General Plan will be a very valuable tool for implementing substantial aviation-related growth.

Ontario's General Plan was designed in 2010 and subsequently implemented to make it central to guiding a transformation of the city, with broad support and diverse linkages to nearly every aspect of the city's governance. It was conceived as a "business plan" connecting the Plan's long-term strategic vision to fiscal sustainability, aligned with the City's budget and daily operations and a clear framework for implementation.

Beginning with a vision of a thriving Ontario in 20-30 years, the Plan presented a framework to ensure that every action of the City would serve these long-range ideals. The six components are: 1) Vision, 2) Governance Manual, 3) Policy Plan, 4) City Council Priorities, 5) Implementation, and 6) Tracking and Feedback.

The City was especially innovative with respect to its Web-based, accessible "Plan of Action," which requires the City to frequently reassess and update its provisions and make the Plan the chief guiding document for major decisions. The move to the Web was effective at drawing in a wider range of resident engagement and making the materials more flexible and accessible.

The key to this approach to implementation is to not see the Plan as the product or responsibility of the planning department as such, but as equally central to every agency and decision-maker in the City organization. Even though Ontario may think of managing growth with a different sensibility than in Seattle, and they are not as explicitly equity-driven, their coordination across agencies, continual updating, and singularity of purpose have served this increasingly diverse community well.

#### Sunnyvale, CA

Sunnyvale is a mid-sized but very complex city located in California's Silicon Valley, with a population of 140,095. It is home to a rapidly expanding technology sector to complement its history in the aerospace industry, and has a relatively diversified housing stock consisting of 41 percent multi-family structures, 39 percent detached single-family homes, 10 percent attached townhomes, and 7 percent mobile homes in 2006. Many aspects of growth management are roughly analogous to those in Seattle, given the largely built-out landscape, high costs of land and construction, the intense demand for housing fueled by the tech sector, and the historic industrial uses.

In Sunnyvale, like Ontario, the General Plan has become a tool for better management, not just a land-use plan. In this case, that approach has been a feature of local government for 40 years, not only in the most recent plan, completed in 2011. The structure and process of planning demonstrate how a General Plan can build confidence in government, while ensuring that the Plan remains relevant and current even as conditions change.

The General Plan is the City's central policy document. This encompasses not just land use decisions, but every action of the City, which must be consistent with the General Plan. A sophisticated monitoring system keeps the Plan relevant and responsive to evolving issues, and ensures that it is faithfully implemented.

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<sup>3</sup> Ontario Mayor Paul Leon, at hearing of the California Assembly Committee on Jobs, Economic Development and the Economy, held in Ontario, CA November 12, 2015.

Monitoring includes Community Condition Indicators, Service Performance Indicators, and a Balanced Growth Profile. This last process may be especially instructive for Seattle:

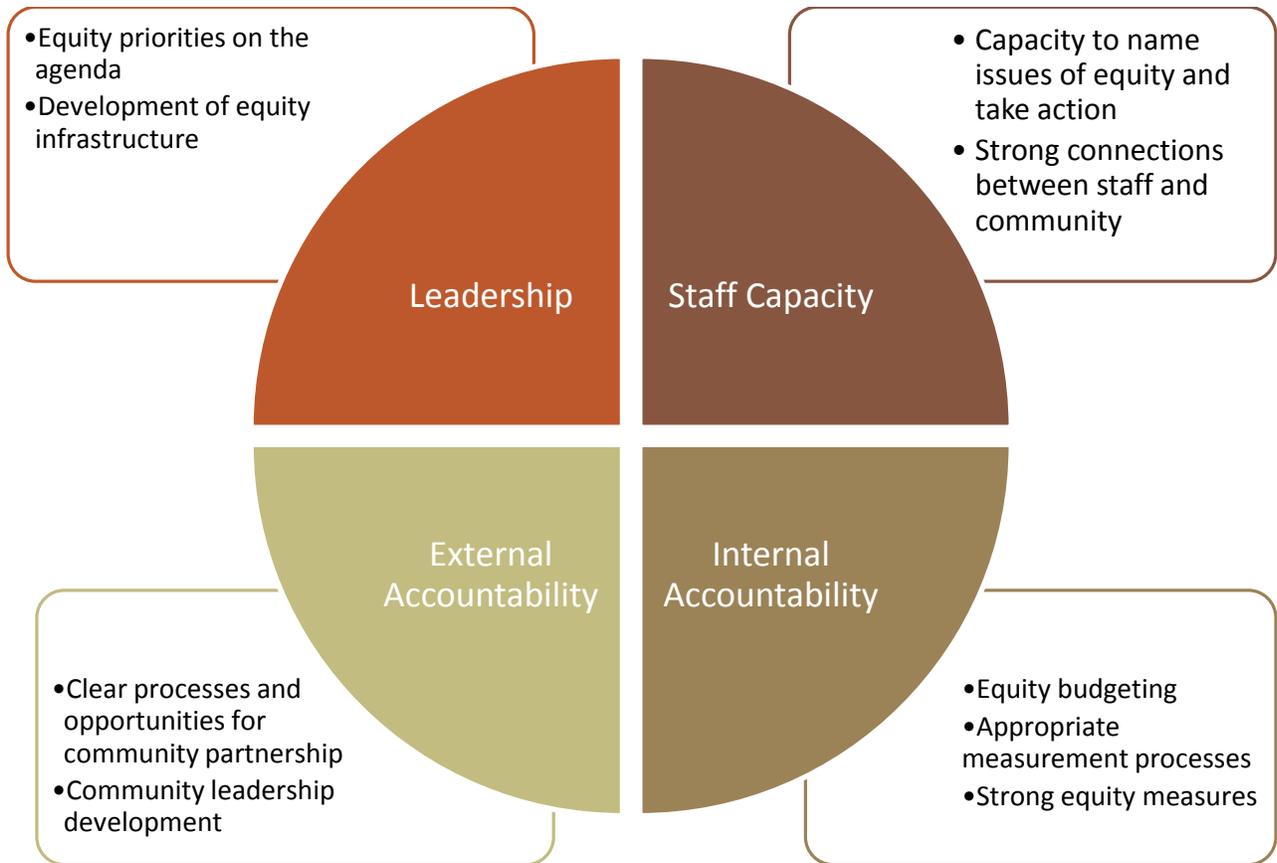
A third monitoring process grew out of City Council's concern over projected population and job growth and its potential negative effects on the City's quality of life. The [Sunnyvale Community Vision](#) devotes an entire chapter to Balanced Growth, creating a Balanced Growth Profile to assist decision-makers in maintaining a reasonable balance between population growth and job growth, and between private development and expansion of the public infrastructure necessary to support it. The Profile is in the form of a bar chart, which plots actual annual increments vs. average projected annual increments over the 20-year life of the Plan. The graphic clearly demonstrates whether jobs and infrastructure (e.g., capacities of schools, utilities, parks and transportation) are keeping up with population growth to maintain overall quality of life.

The planning process was strengthened by incorporating a Community Vision, formulated by residents and businesses. The Mid-Range Strategic Planning process has also been initiated to better link current actions, strategies and budgets to the long-range goals and policies. The independent peer reviewers concluded "During the current climate of widespread cynicism and distrust of local government, residents and businesses in the City of Sunnyvale have considerable respect and confidence in the City's governance and planning. This is due in large part to the City's longstanding success of integrating planning with management."

## Framework for Implementing Equity

Communities vary on many dimensions, of course, but certain features are common to all and certain elements are essential in order to bring about progressive change. The City of Seattle can learn from the experiences of other cities and craft an approach to equity-driven implementation of its Comprehensive Plan which is well-suited to its particular circumstances, issues, population, and form of government.

Our suggestions for how to best implement an equity framework are divided into four categories: Leadership; Staff Capacity; External Accountability; and Internal Accountability. Each of these categories is discussed in further detail below.



### Leadership

Leadership within city government has been essential to the success of equity initiatives at the local level. The support of top decision-makers, ranging from elected officials, city management, and agency heads – depending on the structure of city government – plays a critical role in the speed and effectiveness of efforts. Leadership’s ability to shore up appropriate resources, develop effective staffing structures and cultivate external partnerships are key catalysts for developing, refining, and sustaining the work. While there is great value in leadership itself beating the drum to prioritize and address racial equity within policy and government, leadership that opens channels to financial resources, develops and enables staff to lead, and actively removes impediments and barriers to success can also have a significant impact.

- *Example:* In Richmond, CA, the City Manager provided strong and consistent leadership on health equity as a central value to development in the city. He took great efforts to educate and align all City staff and elected on the City's priorities in this realm. His leadership has helped raise funds and build partnerships across jurisdictional lines and sectors, to support multiple efforts and activities led by City staff. Internally, he promoted interdepartmental collaboration by creating an interdepartmental task force, and requiring this group to meet regularly to discuss and align budget and measurement activities, always with a health equity focus. Staff were appointed within his office to oversee and support interdepartmental efforts, and to build and maintain strong community relationships. Parallel staffing was appointed in the Planning Department, and additional needs supported intermittently by graduate student interns.

Seattle's leadership has played a significant role in advancing equity in all policies, making Seattle a stand out example in creating a strong foundation for just and fair inclusion for all. That said, for the results to match the vision, significant resources must be devoted to support the infrastructure needed to advance and protect an equity agenda. The leadership platform that elected city officials hold allows them to make the case that equity is a superior growth model that will make the entire city more resilient, more prosperous, and more just.

Leadership from both elected officials and appointed City staff is essential to bringing a plan to fruition and making it a policy document for the entire city. Richmond, Ontario, and Sunnyvale have city manager/council forms of government, so the manager, under the policy guidance of, and with the support of, the Mayor and Council, must take the lead to coordinate departments and build the infrastructure for accountability and follow-through: communicating, monitoring and civic engagement. The San Francisco PUC has a General Manager with comparable authority. But in cities where there is not a city manager, the Mayor, his or her staff, and the department heads can and must exercise similar leadership individually and collectively. The SF PUC demonstrated this leadership by strategically partnering with other agencies to effectively deliver on its equity-focused goals: with the arts commission to fulfill its 2% for arts funding obligations; with Department of Youth and Families for its internship and summer jobs programs (1,300 annually); with Parks and Rec for community outreach and programming; with Economic Development for construction trades workforce training and minority contractor procurement support (40% local hire, with 200 adult trainees last year; and 30 contracts with people of color firms); and with the Office of Environment for its environmental justice goals.

### Staff Capacity

At a most basic level, any given city staff member should have the **capacity to identify and act** on equity issues. This requires an understanding of shared definitions of equity and some common equity principles, including (but not limited to) meaningfully partnering with community leaders, ongoing building of community leadership, and collection and disaggregation of data to inform decisions. Training and educating staff requires resources, commitments, and expertise.

Staff ability to implement an equity agenda on the ground level is premised on **strong connections between city staff and the community**. A strong community engagement component is critical to a successful roll out. Critical examinations of community composition are also necessary, as displacement and gentrification grow. Partnerships between departments and agencies that have strong community ties can be built upon or expanded, and new community relationships can be developed, by ensuring staff are tasked with these priorities.

As such, the implementation guidelines frame **must be applicable at multiple levels**. At any single agency, between agencies via interagency offices, at the Office of Planning and Community Development, and at both

the Mayor's office and the City Council, all staff must be given the training, resources, and support to absorb, understand, and implement the equity agenda.

- *Example:* With the rollout of each social justice initiative at SFPUC, staff leadership with expertise on racial equity take explicit steps to provide education to key leaders, and trainings to broader staff. Their lessons directly target the implementation of the new initiative, and also include broader principles for expanded understanding of the issues. The PUC also forms ad hoc advisory groups that include small business leaders and residents to advise them on specific initiatives

### Internal Accountability

The degree that equity principles are manifest, or more simply stated whether the city “walks the equity walk,” will be directly reflected in the city's internal mechanisms for prioritizing and promoting equity. Key structural areas to measure internal accountability are how budgeting, staff, resources, and procurement are shaped around an equity agenda. Specifically, setting and enforcing target percentages for equity budget, procurement, and service delivery goals will be critical to achieving equity goals over the two decades of the comprehensive plan's life. Signature projects that come from the community planning process hold promise, but they run the risk of being held up as one-off pilot projects, emblems of aspirational visions over systemic commitments to addressing structural barriers to equity through regular investments, service improvements, and process improvements. Similarly, systematic monitoring of the growth strategies' impact on community well-being and displacement protections will be a critical internal accountability charge.

- *Example:* As described above, the City of Richmond has introduced a task force of department heads that regularly meets to review shared budget and measurement goals. These budgets and measurement goals, which inform the 20-30-year general plan, align with the 5-year business strategy. At each monthly meeting, rather than provide updates on current activities or needs, the team works with a consistent and ongoing document that requires discussion of outcomes, strategies for measurement of outcomes, time frame, responsible parties, collaborations, funding sources, etc. These discussions, in turn, lead to other updates and ideas.

### External Accountability

Partnering with community partners and making concerted efforts to develop community leadership are key elements to developing a culture of accountability for all City agencies implementing an Equity Agenda. Currently, City agencies have room for growth in developing a deeper community-led process for advancing equity. The key equity outcomes valued by marginalized communities deserve measuring and reporting on—job counts, procurement increases, service improvements, housing affordability, community stability and new capital investments. Regular reporting by race, income, and geography of displacement trends, housing affordability, and commercial stability will need to be a priority external accountability function.

- *Example:* The SF PUC worked with the Office of the Controller (perceived to be independent and objective) to develop an investment evaluation plan for the three environmental justice communities where they are targeting their community benefits outcomes. The evaluation tool includes metrics and data collection strategies to allow regular reporting on progress against annual goals. The SFPUC Community Benefits Program's “Southeast Community Investments Framework Program Evaluation Plan” (March 2015) is a good model for aligning internal and external accountability.

## Specific Recommendations for Seattle’s Implementation

While there are effective methods from other locales that can be adopted fairly directly, implementing Seattle’s Comprehensive Plan will require innovation and creativity to address unique priorities and circumstances, as well as local needs and characteristics.

- Set a cross-department table for addressing implementation, where agreed upon evaluation, measurement, and reporting methodologies and timelines are upheld. The new Office of Planning and Community Development would be a strong candidate for this role.
  - Assign the Race and Social Justice Initiative a central role in co-designing and developing systems that support the four quadrants of the implementation framework.
  - Assign Equitable Development Initiative staff leadership roles in the internal and external accountability quadrants (bringing strong equity capacity to these functions).
  - Utilize this table for development of equity-implementation practices and peer learning to strengthen City capacity in this regard.
  - Create cross-departmental synergies to deliver on equity, such as the Office of Art and Culture helping establish outreach and community collaboration practices; the Office of Economic Development supporting workforce and procurement inclusion goals on City projects; the Office of Education or Human Services on establishing youth jobs and internships across agencies, etc.
  - Establish annual goals for budgeting, service improvements, and equity progress changes (e.g., dedicate 25% of capital budgets to high poverty communities of color; target service improvements in those communities; establish annual internal and external capacity goals).
- Issue a ‘State of Equity Report’ annually to report out to community members and policy makers
  - Establish a ‘Community Leadership Team’ with representatives of Southeast Seattle, Chinatown/International District, and Central District to co-design the report and reporting with the responsible staff.
  - Dedicate funding for qualitative and quantitative data collection and reporting, and for robust community engagement and capacity building.
  - Report on capital investments, service improvements, process changes, and key cross-agency measures, including targeted jobs, contracts, housing and transportation improvements, and residential and commercial stability—disaggregated by race, income and geography.
  - Establish displacement measures and early warning systems to focus attention on highest needs residents and neighborhoods.
  - Align timing of the report with timing of comp plan-related proposal deadlines, and prior to budgeting process to inform annual plan adjustments and resource needs.
  - Make annual adjustments to correct course and build on progress.

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<sup>i</sup> SEATTLE 2035: TOWARD A MORE EQUITABLE GROWTH PLAN: JUNE 12, 2015, BY [ALEX BRENNAN](#)