Note:

A third party consultant reviewed the draft plan and land use and zoning map amendments using the King County Equity Analysis framework. In the Public Review Draft, this study is provided as a separate attachment to the Skyway West Hill Land Use Plan. Revisions to the analysis and Plan will be made based on the feedback gathered as part of the public comment period.
Services and Facilities Provided by King County in Five Potential Annexation Areas

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INTRODUCTION

The King County Council approved creation of the new Department of Local Services (DLS) to begin in January 2019. The County Council also approved a new schedule for subarea planning as called for in King County’s Comprehensive Plan. The first subarea plan to be completed is the Skyway West Hill Plan. DLS is leading this planning effort, which kicked-off in July 2018. The subarea plan is scheduled to be completed during the summer of 2019.

King County’s 2019-2020 Council Budget Ordinance contains a proviso that requires the Skyway West Hill Plan include an equity impact analysis report. The full text of this proviso request is as follows:

A. The equity impact analysis report shall include but be limited to:

1. A description of the services and facilities provided by the county in the five potential annexation areas, which are Skyline/West Hill, North Highline, Fairwood, East Renton and Federal Way, identified in chapter 11 of the adopted amendments to the 2016 King County Comprehensive Plan attached to Ordinance 18810. At a minimum, description of services and facilities provided in each of the five potential annexation areas for youth, transit and economic development shall be included in this description. Through the Community Service Area Subarea Plan development process, other services desired by the Skyway-West Hill community should be included in the equity analysis report; and

2. Using the equity impact analysis tool developed by the county office equity and social justice, identify, evaluate and describe both the positive and negative potential impact of local service delivery in Skyway-West Hill.

This report, authored by BERK Consulting (BERK), responds to item 1 in the proviso request. Specifically, it identifies and describes King County-provided services and facilities for youth, economic development, and transit within the five potential annexations areas. A map of the five potential annexation areas (PAAs) is included in Exhibit 1. The full equity impact analysis (item 2 in the proviso) will be provided in a separate report, incorporating findings from this report as appropriate.
Exhibit 1. Potential annexation areas included in this study, and school district boundaries
Youth Services

The majority of county-provided youth services are organized under King County Employment and Education Resources (EER) within the Department of Community and Human Services (DCHS). To obtain information about these services and associated facilities, BERK interviewed and obtained data from Jennifer Hill, Youth Programs Coordinator as well as information available on the King County website. Additionally, BERK identified services organized through other DCHS divisions as well as Best Starts for Kids awardees.¹

Services are typically offered through facilities that are not owned by the County. In most cases, services are offered through partnerships with other entities such as school districts, or through contracts with service providers working out of their own facilities. EER staff do provide direct services to county residents, often working out of partner facilities. The closest facility location to Skyway where EER staff provide services is WorkSource Tukwila, located at 645 Andover Park W in Tukwila.

Many providers have service areas that match school district boundaries. Several PAAs cross school district boundaries. When summarizing these services, we ignore those in districts that have no overlap, or an only negligible intersection, with a PAA of interest. If a PAA is bisected by school district boundaries, and a service is only offered in one of the two districts, then we note this in the “PAAs Served” column of the summary tables below.

Youth Programs Provided by King County Employment and Education Resources (EER)

Exhibit 2 summarizes youth programs that are provided or led by EER staff.

### Exhibit 2. Youth Programs Provided by EER

<table>
<thead>
<tr>
<th>Program/Description</th>
<th>Target Population</th>
<th>Service Area</th>
<th>PAAs Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>Out-of-School Youth Consortium (OSY): The OSY Consortium is led by Employment and</td>
<td>Youth ages 16 to 24 who have dropped out of high school</td>
<td>Countywide</td>
<td>All</td>
</tr>
<tr>
<td>Education Resources (EER) and is a partnership with the YMCA of Greater Seattle,</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shoreline Community College, Bellevue College, Multiservice Center, and Neighborhood</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>House. The program strives to help youth complete a secondary credential and then</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>enroll into post-secondary opportunities that place them on the path to</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>self-sufficiency. The program serves approximately 400 students Countywide per year.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Many services are offered at sites in Seattle and Tukwila.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reconnect to Opportunity (ReOpp): EER provides outreach and recruitment throughout</td>
<td>Youth ages 16-24 years and not working/not in school</td>
<td>Countywide</td>
<td>All</td>
</tr>
<tr>
<td>King County to Opportunity Youth (young people ages 16-24 years and not working/not</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>in school). ReOpp’s team of Peer Connectors connect young people to an education</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>and/or employment programs that will meet their needs and goals.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><a href="http://www.reopp.org">www.reopp.org</a></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Career Launch Pad: Career Navigators provide low-income young people with case</td>
<td>Low-income</td>
<td>Countywide</td>
<td>All</td>
</tr>
<tr>
<td>management, assessment, development of an individualized employment plan, job</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>readiness training, job search assistance, job placement, job retention and support</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>services (transportation) throughout King County (Kent, Renton, Shoreline/Seattle,</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White Center and Auburn).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Department of Vocational Rehabilitation Pre-Employment Services: Pre-employment</td>
<td>Age 16-21 with an individual employment plan or disability</td>
<td>Seattle School District</td>
<td>North Highline (part)</td>
</tr>
<tr>
<td>training/job readiness training and internship placement and support to young people</td>
<td>Age 16-21 with an individual employment plan or disability</td>
<td>Kent School District</td>
<td>Fairwood (part)</td>
</tr>
<tr>
<td>ages 16-21 with an individual employment plan or disability, and attending a</td>
<td>Age 16-21 with an individual employment plan or disability</td>
<td>Renton School District</td>
<td>Skyway-West Hill; East Renton (part); Fairwood (part)</td>
</tr>
<tr>
<td>partnering school district including Seattle, Kent, Tukwila and Renton school</td>
<td>Age 16-21 with an individual employment plan or disability</td>
<td>Renton School District</td>
<td>Skyway-West Hill; East Renton (part); Fairwood (part)</td>
</tr>
<tr>
<td>districts.</td>
<td>Age 16-21 with an individual employment plan or disability</td>
<td>Renton School District</td>
<td>Skyway-West Hill; East Renton (part); Fairwood (part)</td>
</tr>
<tr>
<td>Open Doors: Young people ages 16-21 are reconnected to basic skills develop in</td>
<td>Age 16-21</td>
<td>Renton School District</td>
<td>Skyway-West Hill; East Renton (part); Fairwood (part)</td>
</tr>
<tr>
<td>order to gain their high school diploma (or equivalency) and move on to college.</td>
<td>Age 16-21</td>
<td>Renton School District</td>
<td>Skyway-West Hill; East Renton (part); Fairwood (part)</td>
</tr>
<tr>
<td>Services are offered at Worksource Tukwila in partnership with Renton Technical</td>
<td>Age 16-21</td>
<td>Renton School District</td>
<td>Skyway-West Hill; East Renton (part); Fairwood (part)</td>
</tr>
<tr>
<td>College and Renton School District and Tukwila School District.</td>
<td>Age 16-21</td>
<td>Renton School District</td>
<td>Skyway-West Hill; East Renton (part); Fairwood (part)</td>
</tr>
</tbody>
</table>
### New Family Services
This program provides education and employment support to young mothers/families enrolled in King County Public Health's Nurse Family Partnership program. EER staff provide education, training, information/referral, and employment services to approximately 100 mothers/families per year. Public Health staff provide child development and family planning services.

<table>
<thead>
<tr>
<th>Program/Description</th>
<th>Target Population</th>
<th>Service Area</th>
<th>PAAs Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Family Services:</td>
<td>Young mothers/families</td>
<td>Countywide</td>
<td>All</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Program/Description</th>
<th>Target Population</th>
<th>Service Area</th>
<th>PAAs Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>Avanza: In partnership with King County Superior Court (KCSC), staff provide educational interventions to truant youth in the Highline School District. Services are targeted to 30 Latino/Latina youth each year, with the goal of increased school engagement and completion.</td>
<td>Latino/Latina youth</td>
<td>Highline School District</td>
<td>North Highline (part)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Program/Description</th>
<th>Target Population</th>
<th>Service Area</th>
<th>PAAs Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gang Intervention Project: EER staff provide education and employment services to youth identified as moderate-high risk to re-offend by King County Superior Court. Youth are referred by their juvenile probation counselor (JPC) who works in partnership with the EER staff to engage youth in positive education and employment activities, including internships.</td>
<td>Youth identified as moderate- to high-risk of reoffending</td>
<td>Countywide</td>
<td>All</td>
</tr>
</tbody>
</table>

### Contracted Services for Youth and Young Adults
Exhibit 3 shows contracted services for youth with legal system involvement or at-risk of legal system involvement. Exhibit 4 shows contracted services for youth that have dropped out of school. These services are provided via third parties under contract to King County.

#### Exhibit 3. Contracted Services for At-Risk Youth and Young Adults

<table>
<thead>
<tr>
<th>Program/Description</th>
<th>Target Population</th>
<th>Providers</th>
<th>Service Area</th>
<th>PAAs Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>Functional Family Therapy (FFT), an evidence-based program, to youth and their families. FFT includes assessment, development of family goals, specific intervention techniques, and teaches skills necessary for success.</td>
<td>Youth age 10-18 and their families</td>
<td>Institute for Family Development</td>
<td>Countywide</td>
<td>All</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Program/Description</th>
<th>Target Population</th>
<th>Providers</th>
<th>Service Area</th>
<th>PAAs Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provides case management and youth development services for youth involved, or at risk for involvement, in the King County juvenile legal system, with a focus on youth with truancy petitions.</td>
<td>Age 12-24</td>
<td>Neighborhood House</td>
<td>South King County</td>
<td>All</td>
</tr>
<tr>
<td>Program/Description</td>
<td>Target Population</td>
<td>Providers</td>
<td>Service Area</td>
<td>PAA Served</td>
</tr>
<tr>
<td>---------------------</td>
<td>-------------------</td>
<td>-----------</td>
<td>--------------</td>
<td>------------</td>
</tr>
<tr>
<td>Provide youth violence prevention program which includes case management services to youth at-risk or involved with the juvenile legal system.</td>
<td>Age 12-24</td>
<td>Southwest Youth and Family Services</td>
<td>Highline School District</td>
<td>North Highline (part)</td>
</tr>
<tr>
<td>Provides civil legal services and community education to help youth involved in the legal system.</td>
<td>Age 11-17</td>
<td>TeamChild</td>
<td>County-wide</td>
<td>All</td>
</tr>
<tr>
<td>Provides case management services for youth involved in prostitution/justice system at the Orion Center.</td>
<td>Age 12-24</td>
<td>YouthCare</td>
<td>County-wide</td>
<td>All</td>
</tr>
<tr>
<td>Provides case management and crisis counseling services as part of the Bridge Program to youth at-risk for involvement in the juvenile justice system.</td>
<td>Age 12-24</td>
<td>Pioneer Human Service</td>
<td>County-wide</td>
<td>All</td>
</tr>
<tr>
<td>Provides case management and substance abuse services to families and youth at-risk for involvement in the juvenile justice systems.</td>
<td>Age 12-24</td>
<td>Friends of Youth</td>
<td>Issaquah School District</td>
<td>East Renton (part)</td>
</tr>
<tr>
<td>Provides youth development services and family support services to youth and families at-risk for involvement in the juvenile justice system.</td>
<td>Age 12-24</td>
<td>Valley Cities Counseling and Consultation</td>
<td>Federal Way School District</td>
<td>Federal Way</td>
</tr>
<tr>
<td>Provides comprehensive services to and youth at risk for involvement in the juvenile justice system.</td>
<td>Age 12-24</td>
<td>Kent Youth and Family Services</td>
<td>Kent School District</td>
<td>Fairwood (part)</td>
</tr>
<tr>
<td>The SPARK T.H.I.S. program is designed to prevent youth involvement in the juvenile justice system through the provision of an array of services that minimize risk factors and builds protective factors (case management).</td>
<td>Age 12-24</td>
<td>Renton Area Youth and Family Services</td>
<td>Renton School District</td>
<td>Skyway-West Hill; East Renton (part); Fairwood (part)</td>
</tr>
<tr>
<td>Provides substance abuse prevention and intervention services to youth in the Highline School District.</td>
<td>Age 12-24</td>
<td>NAVOS/Ruth Dykeman Children’s Center</td>
<td>Highline School District</td>
<td>North Highline (part)</td>
</tr>
</tbody>
</table>
### Exhibit 4. Contracted Services for Youth Who have Dropped out of School

<table>
<thead>
<tr>
<th>Program/Description</th>
<th>Target Population</th>
<th>Providers</th>
<th>Service Area</th>
<th>PAAs Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>Workforce Innovation and Opportunity Act (WIOA): Program provides education (GED, basic skills), training, and employment services to youth who have dropped out of school. Goal is for youth to attain a GED/High school diploma and move on to post-secondary education, advanced training and/or employment.</td>
<td>Youth ages 16 to 24 who have dropped out of high school</td>
<td>Multi-Service Center</td>
<td>Federal Way School District</td>
<td>Federal Way</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Neighborhood House</td>
<td>Kent School District</td>
<td>Fairwood (part)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Accelerator YMCA</td>
<td>Highline School District</td>
<td>North Highline (part)</td>
</tr>
</tbody>
</table>

**Contracted Services for Infants and Youth with Developmental Challenges**

DCHS provides services for infants and youth with developmental disabilities and their families. These services are organized through the Developmental Disabilities and Early Childhood Division (DDECSD) and provided to residents via contracted service providers. Exhibit 5 shows a summary of these services.
Exhibit 5. Contracted Services for Infants and Youth with Developmental Challenges

<table>
<thead>
<tr>
<th>Program/Description</th>
<th>Target Population</th>
<th>Providers</th>
<th>Service Area</th>
<th>PAAs Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early Support for Infants and Toddlers. Early intervention services for families with children from birth to age three who have developmental challenges.</td>
<td>Families with children from birth to age 3 who have developmental challenges</td>
<td>Childhaven</td>
<td>South King County (with branch location in North Highline PAA)</td>
<td>All</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Children’s Therapy Center EI</td>
<td>South King County</td>
<td>All</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Northwest Center Kids</td>
<td>Seattle and parts of south King County</td>
<td>North Highline; Skyway-West Hill (part)</td>
</tr>
</tbody>
</table>

Best Starts for Kids Awardees

The Best Starts for Kids (BSK) program is managed by DCHS and funded by a voter-approved initiative. It invests an average of $65 million per year to provide support to youth and families in King County. To date, DCHS has made 421 awards to community organizations, non-profits, schools and school districts, tribes and tribal organizations, and public or governmental agencies serving communities in King County. It considers awardees to be partners in providing services to King County residents. These services include early childhood support (prenatal to age 5) and youth and young adults (age 5-24).

While limited data about the 421 awardees is available, data about specific service locations and service area boundaries is not. However, BERK was able to obtain data about the taxpayer address for most BSK awardees and compare those addresses to PAAs. The results are in Exhibit 6, which shows that BSK has awarded funds to at least 13 organizations that may be based in or near the five PAAs. It is possible not all of these organizations have facilities where services are provided in or near the associated PAA. It is also very likely that many other awardees provide services to residents of the five PAAs.

---

## Exhibit 6. Best Starts for Kids Awardees with Taxpayer Address Locations in or near PAAs of Interest

<table>
<thead>
<tr>
<th>Organization</th>
<th>Taxpayer Address Location*</th>
<th>Target Population</th>
<th>BSK Strategy</th>
<th>Total Contract(s) Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community Network Council (CNC)</td>
<td>Federal Way PAA</td>
<td>Five to 24</td>
<td>Create Healthy and Safe Environments</td>
<td>$1,737,495</td>
</tr>
<tr>
<td>WAPI Community Services</td>
<td>Federal Way Buffer</td>
<td>Five to 24</td>
<td>Create Healthy and Safe Environments</td>
<td>$578,518</td>
</tr>
<tr>
<td>Westside Baby</td>
<td>North Highline PAA</td>
<td>Prenatal to Five</td>
<td>Basic Needs Resource</td>
<td>$386,862</td>
</tr>
<tr>
<td>White Center Community Development Association</td>
<td>North Highline PAA</td>
<td>Prenatal to Five</td>
<td>Kaleidoscope Play and Learn</td>
<td>$1,109,880</td>
</tr>
<tr>
<td>Northwest Center</td>
<td>North Highline Buffer</td>
<td>Prenatal to Five</td>
<td>Innovation Fund</td>
<td>$1,324,493</td>
</tr>
<tr>
<td>Sea Mar Community Health Center</td>
<td>North Highline Buffer</td>
<td>Prenatal to Five</td>
<td>Home-Based Services</td>
<td>$8,000</td>
</tr>
<tr>
<td>Urban Family Center Association</td>
<td>Skyway-West Hill PAA</td>
<td>Five to 24</td>
<td>Stopping the School to Prison Pipeline</td>
<td>$10,000</td>
</tr>
<tr>
<td>Apprenticeship and Non-Traditional Employment for Women (ANEW)</td>
<td>Skyway-West Hill Buffer</td>
<td>Five to 24</td>
<td>Youth Successfully Transition to Adulthood</td>
<td>$225,055</td>
</tr>
<tr>
<td>HealthPoint</td>
<td>Skyway-West Hill Buffer</td>
<td>Five to 24</td>
<td>School Based Health Centers Enhancement</td>
<td>$1,559,333</td>
</tr>
<tr>
<td>King County Sexual Assault Resource Center</td>
<td>Skyway-West Hill Buffer</td>
<td>Five to 24</td>
<td>Trauma Informed Restorative Practices</td>
<td>$10,000</td>
</tr>
<tr>
<td>Renton Area Youth and Family Services</td>
<td>Skyway-West Hill Buffer</td>
<td>Prenatal to Five</td>
<td>Kaleidoscope Play and Learn</td>
<td>$244,878</td>
</tr>
<tr>
<td>Voices of Tomorrow</td>
<td>Skyway-West Hill Buffer</td>
<td>Five to 24</td>
<td>Create Healthy and Safe Environments</td>
<td>$250,000</td>
</tr>
<tr>
<td>West African Community Council</td>
<td>Skyway-West Hill Buffer</td>
<td>Prenatal to Five</td>
<td>Parent Caregiver Education and Support</td>
<td>$146,905</td>
</tr>
</tbody>
</table>

* Providers in “Buffer” locations are within 1 mile of PAA boundaries.

Source: King County, 2019; IRS, 2019; BERK, 2019.
Youth Recreational Facilities and Parks Programming

King County maintains GIS data on the location of parks and recreational facilities. BERK identified facilities relevant to youth recreational activities\(^5\) within each PAA. Exhibit 7 shows counts of facilities by type for each PAA. While these counts do provide a useful comparison, readers should keep in mind that data about the size or quality of these individual facilities is not available. Additionally, BERK has not discussed limitations of this data with King County Parks and Recreation staff members. Maps of all parks and recreational facilities for each PAA are provided at the end of this report.

Exhibit 7. Count of Youth Recreational Facilities by Type for each PAA

<table>
<thead>
<tr>
<th>Facility Type</th>
<th>East Renton</th>
<th>Fairwood</th>
<th>Federal Way</th>
<th>North Highline</th>
<th>Skyway-West Hill</th>
</tr>
</thead>
<tbody>
<tr>
<td>Playground or Play Area</td>
<td>2</td>
<td>3</td>
<td>5</td>
<td>4</td>
<td>1</td>
</tr>
<tr>
<td>Multi-Purpose Court</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Tennis Court</td>
<td>0</td>
<td>0</td>
<td>2</td>
<td>6</td>
<td>1</td>
</tr>
<tr>
<td>Baseball Field</td>
<td>0</td>
<td>4</td>
<td>7</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Soccer or Open Play Field</td>
<td>0</td>
<td>6</td>
<td>7</td>
<td>6</td>
<td>1</td>
</tr>
<tr>
<td>Other Recreation Facility</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>4</td>
<td>0</td>
</tr>
</tbody>
</table>

Source: King County, 2019; BERK, 2019.

King County Parks operates a single community center in North Highline. Located in Steve Cox Memorial Park, the White Center Community Center, also known as “The Log Cabin”, is an historic landmark fieldhouse built during the Works Progress Administration era. It is currently home to King County Parks’ White Center Teen Program and used occasionally for King County-sponsored community events, such as the Peace in the Hood Job Fair, the Repair Café, and the annual family Halloween Carnival. The White Center Teen Program serves youth ages 12-19 from the North Highline unincorporated area and provides free, year-round, recreational, educational and enrichment programming in both structured and drop-in formats. The programs focus on activities that develop social, life, and leadership skills, offer youth opportunities to contribute to their community, enrich academic experiences, and provide quality time with caring adults.

King County Parks also manages the Youth and Amateur Sports Grant program. Established in 1993 through State and County legislation, the program is funded through a 1% tax on car rentals in King County. The grants are available to local government agencies and non-profits to support capital projects and programs aimed at getting youth and adults active. There is roughly $4 million to award annually through grants ranging from $5,000 to $250,000. The funds are dispersed in the following four different grant categories: 1) council discretionary Get Active-Stay Active grants; 2) Youth sports programs; 3) Youth sports facilities; and 4) Unincorporated King County sports programs and facilities. There is an annual call for applications in January. Exhibit 8 shows 2019 grants awarded to facilities.

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\(^5\) These include playgrounds, pools, play fields, play courts, and “other recreational facilities” of potential interest to youth such as horseshoe pits, lookout towers, and a disc golf course. The dataset tracks play equipment separately from playgrounds. Our analysis indicates play equipment is always contained within a playground. Therefore we present only counts of playgrounds.
serving one of the PAA study areas.

**Exhibit 8. King County Youth and Amateur Sports Grant Awards in PAA Study Areas**

<table>
<thead>
<tr>
<th>Organization</th>
<th>Project Name</th>
<th>Grant Award</th>
<th>PAA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highline Public Schools</td>
<td>Evergreen High School Field Lighting</td>
<td>$200,000</td>
<td>North Highline</td>
</tr>
<tr>
<td>Renton School District</td>
<td>The Skyway S.H.A.P.E. Project</td>
<td>$100,000</td>
<td>Skyway-West Hill</td>
</tr>
</tbody>
</table>

**Transit Service and Facilities**

King County Metro provides bus service and Access paratransit service in all five PAAs. Metro also owns or leases several park and ride lots that serve PAAs. Exhibit 9 provides a comparison of transit service levels in each PAA. North Highline and Skyway-West Hill receive significantly more service than the other PAAs. While the vast majority of service in these PAAs is funded by Metro, one route in Skyway-West Hill and two routes in North Highline benefit from additional investments in service frequency from the City of Seattle.

**Exhibit 9. Weekly Metro Transit Trips per 1,000 residents by PAA**

<table>
<thead>
<tr>
<th>PAA Name</th>
<th>Estimated Total Population, 2018</th>
<th>Total Weekly Metro Transit Trips</th>
<th>Weekly Metro Transit Trips per 1,000 Residents</th>
</tr>
</thead>
<tbody>
<tr>
<td>East Renton</td>
<td>6,687</td>
<td>95</td>
<td>14</td>
</tr>
<tr>
<td>Fairwood</td>
<td>24,215</td>
<td>570</td>
<td>24</td>
</tr>
<tr>
<td>Federal Way</td>
<td>23,107</td>
<td>816</td>
<td>35</td>
</tr>
<tr>
<td>North Highline</td>
<td>20,046</td>
<td>3,868</td>
<td>193</td>
</tr>
<tr>
<td>Skyway-West Hill</td>
<td>17,176</td>
<td>2,308</td>
<td>134</td>
</tr>
</tbody>
</table>

Source: Esri, 2019; King County Metro, 2019; BERK, 2019.

**Transit Service in Skyway-West Hill**

Four bus routes operate through the Skyway-West Hill community between Renton and Seattle. Additional evening service on Route 106 provided by funding from the STBD.

**Route 101:** All Day Route
- Operates along MLK Jr Way S
- 15-minute peak and midday service, 30-minute off peak/night/weekend service
- Average weekday ridership is about 5,375 rides (Spring 2017)

**Route 102:** Peak Only Route

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6 In 2014, Seattle voters approved funding for additional Metro service on select routes through the Seattle Transportation Benefits District (STBD).
Operates along MLK Jr Way S, supplemental peak service for Route 101
- Weekday, peak-only route
- Weekday ridership is about 1,100 rides (Spring 2017)

**Route 106**: All Day Route
- Operates along Renton Ave S
- 15-minute service weekdays and Saturdays, 30-minute service nights and Sundays
- Weekday ridership is about 6,030 rides (Spring 2017)

**Route 107**: All Day Route
- Operates through the Lakeridge/West Hill neighborhoods
- 15 to 30-minute peak service, 30-minute off peak/night service
- Weekday ridership is about 3,100 rides (Spring 2017)

**Park and Ride** (owned or leased by KC):
- Community Bible Fellowship (11227 Renton Ave S) has 29 spaces

**Transit Service in North Highline**

Seven bus routes operate through the North Highline. Additional service frequency on Route 60, and late-night service on Route 120 provided by funding from the STBD.

**Route 22**: All Day Route
- Operates along SW 106th & 26 Ave SW
- Hourly service
- Average weekday ridership is about 230 rides (Spring 2017)

**Route 60**: All Day Route
- Operates along SW Roxbury St.
- 15-minute peak, 15 to 20 minute off-peak & night service
- Average weekday ridership is about 5,260 rides (Spring 2017)

**Route 113**: Peak Commuter Route
- Operates between Shorewood and downtown Seattle, along 26th Ave SW & SW Roxbury St
- Peak only service with 5 AM and 4 PM trips
- Average weekday ridership is about 280 rides (Spring 2017)

**Route 120**: All Day Route
- Operates between Burien and downtown Seattle via Ambaum Blvd SW & 15th Ave SW
- Service every 7 to 15 minutes in the peak, 15 to 30 minutes off-peak, and 30-60 minutes at night
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- Planned upgraded to H Line RapidRide service in 2020
- Average weekday ridership is about 9,240 rides (Spring 2017)

**Route 128:** All Day Route
- Operates between West Seattle and Southcenter via 8th Ave SW, S 120th St, Military Rd S
- Service every 30 minutes, seven days a week
- Average weekday ridership is about 3,720 rides (Spring 2017)

**Route 131:** All Day Route
- Operates between Burien and downtown Seattle via 1st Ave S
- Service every 15 to 30 minutes in the peak, 30 minutes in the off-peak, and 60 minutes at night
- Average weekday ridership is about 3,200 rides (Spring 2017)

**Route 132:** All Day Route
- Operates between Burien and downtown Seattle via Des Moines Memorial Drive
- Service every 20 to 30 minutes in the peak, 30 minutes in the off-peak, and 60 minutes at night
- Average weekday ridership is about 3,000 rides (Spring 2017)

**Park and Rides (owned or leased by KC):**
- Holy Family Church (9641 20th Avenue SW) has 23 spaces (located just outside of PAA)
- Beverly Park First Baptist Church (11659 1st Avenue S) has 12 (located just outside of PAA)
- Olson PL SW/Myers Way (9000 Olson PI SW) has 100 spaces (located just outside of PAA)
- Sonrise Evangelical Free Church (610 SW Roxbury) 10 spaces (located just outside of PAA)

**Transit Service in Fairwood**

**Route 102:** Weekday Peak Period Commuter Express
- Operates through unincorporated Fairwood to downtown Seattle via Renton, serving the South Renton Park & Ride.
- Peak express service with 7 AM and 7 PM trips
- Average weekday ridership is about 1,100 rides (Spring 2017)

**Route 148:** All Day Route
- Operates between Fairwood Center (143rd/Petrovitsky) and the Renton Transit Center via the South Renton Park & Ride.
- Service is every ½ hour on weekdays and hourly evenings and on weekends
- Average weekday ridership is about 615 rides (Spring 2017)

**Route 906:** All Day Route
- Operates between Fairwood and Southcenter via Petrovitsky Rd, Carr Rd, and S 180th St – also
Transit Service in East Renton

Route 111: Maplewood to Lake Kathleen to Downtown Seattle
- Weekday service only.
- Operates 5:16 am-9:28pm

Park and Ride: New Life at Renton (15711 152nd Ave SE) has 25 spaces

Transit Service in Federal Way

Route 181: Twin Lakes P&R to Auburn Station to Green River College
- Weekday, Saturday and Sunday Schedules. Weekend has different schedules
- Weekday service runs 5:15 am-11:33pm

Route 183: Federal Way TC to Star Lake to Kent Station
- Weekday and Saturday service. Fewer Saturday hours. No Sunday Service.
- Weekday service runs 5:23 am-9:52 pm. Transfer to route 153 at Kent Station.

Park and Ride (owned or leased by KC):
- All Saints Lutheran Church (27225 Military Rd S) has 75 spaces
- St. Columba’s Episcopal Church (26715 Military Rd S) has 15 spaces

Economic Development Services

King County is currently going through a transition in how it approaches local economic development in unincorporated areas. Historically, the county’s work to promote economic development has been based in the Executive Office. While their goals for economic development are to retain existing businesses, recruit businesses, and support new business start-ups countywide, in practice most of their effort has been focused on workforce development. The strategy has been to help prepare local residents—particularly those who face barriers—to participate in the strong local economy.

KCEO administers county workforce funding with an emphasis on prioritizing funding to 15 targeted population groups determined to be underserved and in need of assistance. Some of these funds go to the EER to fund programs for older youth and young adults. Other funding goes to providers serving adults and dislocated workers. Historically geography has not been a significant consideration in the selection of service providers. However, this year’s funding includes targeted programs for the
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communities of Skyway and North Highline.\(^7\)

In 2018, the Economic Development Council of Seattle and King County (EDCSKC) was invited to nominate five census tracts under the federal Opportunity Zones program. This program provides tax incentives to investors who fund businesses in underserved communities. King County Executive formally endorsed the nominations of EDCSKC, three of which are in unincorporated King County. Census Tract 53033026100 in the Skyway-West Hill PAA and Census tracts 53033026801 and 53033026802 in the North Highline PAA. Additionally, the community of White Center in North Highline has been designated as a Community of Opportunity (COO) through a joint initiative between King County and the Seattle Foundation.\(^8\) King County is working to develop a Communities of Opportunity Fund that will stack multiple forms of investor and COO capital for socially responsible investments in projects that align with the strategies of the COO communities.

With the formation of DLS came a new staff position for an Economic Development Program Manager. This individual is responsible for promoting economic development in unincorporated areas. One of his first activities is to support the subarea planning process for Skyway-West Hill by identifying opportunities to leverage proposed land use changes to promote local economic development. This work has involved engagement with community members to understand what kinds of businesses they need, or hope to retain, in their local business district. In addition to supporting the planning process, the ED Program Manager actively promotes opportunities for new development in unincorporated areas that are consistent with local economic development goals, connects potential developers with financing opportunities, and helps them to navigate the process of obtaining necessary permits.

The services of the ED Program Manager are available to all five PAAs. The job duties include support for future subarea planning processes in North Highline as well as those that follow. More broadly, this position is responsible for identifying and implementing strategies that will advance and actively apply the King County Equity and Social Justice Plan and priorities to enhance economic opportunities for residents and businesses within unincorporated areas, with particular emphasis on communities of color.

MAPS OF PARKS, RECREATIONAL FACILITIES, AND TRANSIT SERVICE BY PAA

The following series of maps shows available data about King County owned parks and recreational facilities, Metro transit service, and county-owned or leased park and ride locations by PAA.

\(^7\) Source: Paige Shelvin, Economic Development Policy Advisor, KCEO
\(^8\) https://www.cooppartnerships.org/
Skyway-West Hill Subarea Plan

Equity Impact Analysis

Introduction

This report presents an Equity Impact Analysis of the public review draft of the Skyway-West Hill Subarea Plan, in response to a request from the King County Council.¹ The Skyway-West Hill Subarea Plan proposes to update an existing subarea plan from the 1990s with a number of policy and land use changes. These changes are detailed in the main body of the public review draft, of which this analysis is an appendix.

The purpose of this report is to identify potential equity implications of implementing the Skyway-West Hill Subarea Plan compared to taking no action. It is intended to support King County decision makers’ consideration of equity implications as they make final revisions to the Subarea Plan and subsequently work towards implementation and ongoing monitoring.

This report is authored by BERK Consulting (BERK), who was engaged by King County Department of Local Services (DLS) to conduct this analysis between April and June 2019. BERK worked closely with staff in DLS as well as leadership from the Executive’s Office to identify a scope of work that both responds to the Council request and provides relevant analysis to help inform the final draft of the Subarea Plan.

This analysis is organized according to the County’s Equity Impact Review Process,² which was last updated by King County’s Office of Equity and Social Justice in 2016. The process includes five phases which are as follows:

- Phase 1. Scope. Identify who will be affected.
- Phase 2. Assess equity and community context.
- Phase 3. Analysis and decision process.

¹ King County’s Council Budget Ordinance 2019-2020, signed on November 14, 2018, contains a proviso that requires the Skyway-West Hill Subarea Plan include an equity impact analysis report. The proviso includes two separate items. Item 1 is addressed in a separate report. This report addresses Item 2. The full text of this proviso request is as follows:

“A. The equity impact analysis report shall include but be limited to: 1) A description of the services and facilities provided by the county in the five potential annexation areas, which are Skyline/West Hill, North Highline, Fairwood, East Renton and Federal Way, identified in chapter 11 of the adopted amendments to the 2016 King County Comprehensive Plan attached to Ordinance 18810. At a minimum, description of services and facilities provided in each of the five potential annexation areas for youth, transit and economic development shall be included in this description. Through the Community Service Area Subarea Plan development process, other services desired by the Skyway-West Hill community should be included in the equity analysis report; and 2) Using the equity impact analysis tool developed by the county office equity and social justice, identify, evaluate and describe both the positive and negative potential impact of local service delivery in Skyway-West Hill.”

² More information is available at: https://www.kingcounty.gov/elected/executive/equity-social-justice/tools-resources.aspx
This process is designed to be initiated at the very beginning of a project. Given that the County retained BERK to initiate this Equity Impact Review at a relatively late stage in the subarea planning process, we needed to rely on a review of community engagement work already conducted by county staff to support our analysis and discussion of Phases 1 and 2. This review was supplemented with targeted, and limited, stakeholder engagement. Phases 1 and 2 both call for direct engagement with community members and stakeholders. Much of the engagement for the subarea planning process occurred prior to April 2019 (see Exhibit 1 for a brief timeline). Therefore, to complete these two sections of the Equity Impact Review, we summarized findings from the prior engagement work and supplemented with targeted, and limited, stakeholder outreach. Phases 4 and 5 provide guidance for community engagement and ongoing performance evaluation during and following implementation. Given that this report is being released prior to the Subarea Plan’s implementation, we provide high level recommendations for the County to consider when carrying out Phases 4 and 5.

Exhibit 1. Skyway-West Hill Subarea Plan Equity Analysis Timeline

This analysis considers three forms of equity. **Distributional equity** refers to the fair and just distribution of benefits and burdens to all affected parties across the community. **Process equity** refers to the inclusivity, openness, and fair access by all stakeholders to the decision process. **Cross-generational equity** refers to the effects of current actions on the fair and just distributions of benefits and burdens to future generations.

**Equity Impact Review**

**SCOPE: WHO WILL BE AFFECTED BY THIS ACTION? (PHASE 1)**

Skyway-West Hill is a diverse area of unincorporated King County composed of distinct neighborhoods and cultural communities. Changes to land use in Skyway-West Hill have the potential to benefit or burden different residents in different ways. This is because the needs and vulnerabilities of residents can vary significantly based on factors such as household income, homeownership status, access to networks of support, English language proficiency, immigration status, civic engagement, and many others. This section builds on the demographic profile provided in the Draft Subarea Plan to identify notable differences

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3 This additional stakeholder engagement included participation in two meetings with the Skyway Solutions board of directors and attendance at a community forum on equity and displacement risk that featured speakers from the Skyway community.
and disparities that are related to residents’ needs and vulnerabilities. It also identifies stakeholder groups and populations of concern as well as their roles in decision making with regards to the Subarea Plan.

**Stakeholders and Populations of Concern**

The diverse and varied profile of the Skyway-West Hill area indicates that equitable outreach and engagement in this area should be inclusive of people based on characteristics such as: language spoken, race and ethnicity, age, geographic location, and housing tenure. Businesses and agencies that provide social, health, and human services to the community should also be engaged.

**Language Communities**

Residents who do not speak English, or do so with difficulty, face significant challenges in their ability to engage in civic life, including the subarea planning process. In 2017, approximately 7,300 people, or 43% of the community, spoke a language other than English at home. Approximately 3,900 people, or 23% of the community, have at least some difficulty speaking English. Nearly 12% of all households are “limited English-speaking households”, or all members 14 years or older have at least some difficulty speaking English.5

Most outreach and engagement activities are conducted in English because it is the dominant language in the United States and the language of government. Since 43% of the people in the study area speak another language at home, and nearly a quarter of the population does not have strong English-proficiency, it is important to communicate with people in the languages they feel most comfortable. Top languages spoken in the community include: Vietnamese, Tagalog, Spanish, Mandarin, Cantonese, Russian and Somali.

Since language is a key component of culture, effective communication with other language groups requires more than providing translation and interpretation. It is important that the design of outreach methods, materials, and engagement events is culturally appropriate as well as linguistically appropriate. Engagement with diverse language groups should include opportunities to identify existing and desired landmarks, institutions, and amenities in the neighborhood to better understand how proposed development affects cultural landscapes.

**Racial and Ethnic Communities**

Skyway-West Hill is a diverse community where over 70% of the residents are people of color. Approximately a third of residents identify as Asian, about a quarter of residents identify as Black or African American, and one in ten residents identify as Latino. There are significant racial disparities within Skyway-West Hill that impact vulnerability to land use change. For instance, about 73% of White households are owner-occupied compared to only 29% of Black households. Engaging with people from a variety of ethnic and cultural groups from within the community is one way to better understand some

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4 All statistics in this section are based on 2013 - 2017 American Community Survey (ACS) 5-Year Estimates unless otherwise noted.

5 A “limited English-speaking household” is one in which no member 14 year or older speaks only English or speaks English “very well”.
of the context for community disparities including structural disparities related to institutionalized racism, racial privilege, and systemic inequalities.

Just as with those who speak languages other than English, engagement with racial and ethnic communities should include opportunities to identify existing and desired landmarks, institutions, and amenities in the neighborhood to better understand how proposed development affects cultural landscapes. The needs and interests of people that identify within a particular racial or ethnic group are diverse and depend upon the intersectionality of other factors such as gender, age, or social class as well as personal experience. This makes it especially important to engage with as many people as possible, and from a variety of racial and ethnic groups, to consider distributional equity.

**Youth**

Nearly a quarter of Skyway-West Hill residents are younger than 18. For this plan to achieve cross-generational equity, it must consider the unique needs and circumstances of children and teens. Plans that provide safe, secure, healthy, and accessible environments for youth are often an indicator that they are beneficial for people of all ages. Engagement for youth should include an exploration of how the existing landscape provides support or presents challenges so these issues can be evaluated.

**Seniors and Elderly Residents**

About 14% of the population is age 65 or older, similar to King County as a whole. As with youth, older adults also have special needs and vulnerabilities to land use change. Zoning and development standards can impact the ability of seniors to age in place or find suitable housing that meets their changing needs. Similarly, providing for the mobility of seniors requires special consideration for the pedestrian environment and accessibility of new development. Engagement for older residents should include an exploration of how the existing landscape provides support or presents challenges so these issues can be evaluated.

**Persons with Disabilities**

According to Census estimates, about 13% of the population in Skyway-West Hill have some kind of disability, such as challenges with mobility or cognitive difficulties. This is a slightly higher share than is found among all county residents (10%). Those with disabilities are much more likely to be over age 65, and the needs of disabled residents often overlap with those of elderly residents. Engagement for disabled residents should include an exploration of how the existing landscape provides support or presents challenges so these issues can be evaluated.
Neighborhoods

Skyway-West Hill is mostly composed of two different Census tracts which split the area nearly in half, roughly along existing neighborhood boundaries. Comparing demographic and socioeconomic data for these two census tracts reveals significant differences between the residents of Skyway in the southwestern portion of the study area and Bryn Mawr in the north eastern portion closer to Lake Washington. Exhibit 2 shows a map of the two tracts. Exhibit 3 compares key demographic and socioeconomic characteristics associated with those tracts.

Exhibit 2. Census Tracts in Skyway-West Hill

Exhibit 3. Census Tracts in Skyway-West Hill with Demographic and Socioeconomic Characteristics

<table>
<thead>
<tr>
<th></th>
<th>Tract 53033026100 (Mostly Skyway)</th>
<th>Tract 53033026001 (Mostly Bryn Mawr)</th>
<th>King County</th>
</tr>
</thead>
<tbody>
<tr>
<td>Median Household Income</td>
<td>$49,104</td>
<td>$86,318</td>
<td>$83,570</td>
</tr>
<tr>
<td>Percent of population with income below 200% of Federal Poverty Level</td>
<td>42%</td>
<td>27%</td>
<td>22%</td>
</tr>
<tr>
<td>Percent people of color (Non-White and/or Hispanic or Latino)</td>
<td>78%</td>
<td>64%</td>
<td>34%</td>
</tr>
<tr>
<td>Percent that speak English less than very well</td>
<td>25%</td>
<td>16%</td>
<td>21%</td>
</tr>
<tr>
<td>Percent foreign born</td>
<td>38%</td>
<td>30%</td>
<td>22%</td>
</tr>
</tbody>
</table>
When viewing the demography of the two primary census tracts in the study area, there are social and economic differences between the “Mostly Skyway” tract and the “Mostly Bryn Mawr” tract. This makes it important to engage with people from both areas to collect input on priorities and concerns. The draft Skyway-West Hill Subarea Plan proposes to repeal the P-suffix conditions which affects the study area widely. The majority of the proposed land use changes are located in, or within close proximity to, the “Mostly Skyway” tract. There are three proposed amendments for the Rainier Avenue Business district that are in a third census tract located outside the “Mostly Bryn Mawr” tract in the easternmost portion of the study area.

From a social landscape perspective, most of the proposed changes are located within the Skyway neighborhood. Although Renton Avenue South is the primary dividing line between the two census tracts, both sides of the street are considered to be part of the Skyway neighborhood. Housing on the east side of Renton Avenue South is likely to identify as being part of Skyway. It is very likely that this association holds for most housing on top of the hill and transitions to an association with Bryn Mawr or Lakeridge neighborhoods as the topography changes to hillside and access is taken from Rainier Avenue. As a result, those who consider themselves residents of Skyway live in the area where there is the most proposed change. Community outreach and engagement to the Skyway neighborhood is particularly important given the location of the proposed changes.

There is also a set of changes in the “Mostly Skyway” tract that potentially affects residents and businesses near the Martin Luther King Jr. South Business District. Outreach and engagement efforts should include specific opportunities for participation from this area.

**Renters and Low-Income Households**

The majority of households in Skyway-West Hill own their home. However, 42% of households rent and those households are more likely to be people of color. They are also more likely to have lower incomes and to experience housing cost burden, both factors potentially increase susceptibility to economic and physical displacement in areas of neighborhood change. This susceptibility makes it especially important to include renters, and particularly those that may be economically challenged, in community engagement related to neighborhood changes.

Exhibit 4 compared the incomes of renter and owner households. In 2019 Median Family Income (MFI,
also known as Area Median Income, or AMI) for King County is estimated to be $108,600. As of 2015, HUD estimated that nearly a third of renter households had incomes below 30% of MFI and over half of renter households had incomes below 50% of MFI.

Exhibit 4. Renter and Owner Households by Income Level, Skyway-West Hill


Exhibit 5 breaks down renter and owner households in Skyway-West Hill by their level of housing cost-burden. A severely cost-burdened household is spending over half of its household income on housing costs. A cost-burdened household spends over 30% of its income on housing costs. Overall, about 40% of households are cost-burdened, and nearly 20% are severely cost-burdened. Among renters these percentages are somewhat higher.

Exhibit 5. Renter and Owner Households by Level of Housing Cost-Burden, Skyway-West Hill

Source: HUD CHAS (based on ACS 2011-2015 5-year estimates); BERK, 2019.

People who are cost-burdened, have less resources available to pay for other necessities like transportation, education, food, and clothing. They are also more likely to be at risk of losing their home if an unexpected event impacts their income and ability to pay rent or mortgage. They are also more vulnerable to displacement when housing costs rise.

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7 Source: HUD, 2019. “FY 2019 Median Family Income Documentation System.” https://www.huduser.gov/portal/datasets/il/il2019/2019MedCalc.odn. MFI is generally much higher than median household income since family households are more likely to include dual incomes. HUD adjusts for household size when grouping households into income categories relative to MFI.

8 In this chart, “cost-burdened” refers to those spending greater than 30% but less than 50% of their income on housing costs.
Businesses

Businesses have a lot to gain from neighborhood changes, but they can also be susceptible to displacement due to land use change. Physical and economic displacement can result from redevelopment, but cultural displacement can also occur if patrons and customers move out of the neighborhood. Neighborhood businesses provide goods and services that meet community needs and often reflect community character. Some businesses can act as gathering places and fulfill key roles as social and cultural institutions, landmarks, and amenities. Engagement should include opportunities to talk about neighborhood change with existing businesses.

Another category of businesses includes builders and developers who see the study-area as a place of investment opportunity. Engaging with such businesses provides an opportunity to test proposed policy and land use changes for investment feasibility. It could also provide opportunities for the community to discuss its vision, values, needs, and desires with potential investors.

Community Service Providers

All communities require social, health, and human services to support the people in living their best life. These services are provided by community institutions such as the Renton School District, by government agencies like Seattle-King County Public Health, by non-profit organizations such as Communities in Schools of Renton, by faith-based groups like churches or mosques, and by business providers such as doctors, dentists, or counselors. Each community will have a different set of service partners that they work with, depending on their needs. All communities have gaps in service, but the gaps are likely to be greater and of more significance in areas where the population experiences social, economic, and cultural disparities. Engaging with community service providers helps to identify community disparities that affect distributional, process, and cross-generational equity. They may also provide connections to trusted community advisors for groups that are hard to reach as a result of those disparities.

Community Engagement Summary

Community engagement in the subarea planning process provides the opportunity for participants to shape the plan. Ideally, the County planner facilitates community development of the plan and shares expertise in land use and community development with the community to guide their work. They also assist the community with processes designed to balance competing interests and priorities. The ability for the community to influence plan development changes throughout the process.

- Visioning. Input given at the visioning stage helps to direct plan goals and objectives.
- Plan Development. During plan development, engagement steers the policies and strategies that are proposed.
- Draft Plan. Once a draft is released, community review can recommend that the plan is confirmed, redirected, or rejected.
- Implementation. Community involvement focuses the implementation of plan objectives and policies to ensure that it meets the vision.

King County engaged the community in a variety of ways during the visioning and plan development
stages. The County’s summary of community engagement activities appears in Appendix E. For the visioning stage the County relied on the work that came out of the 2015 Skyway-West Hill Action Plan which included community forums, stakeholder interviews and focus groups, community events, and digital engagement. Initially the County planned two meetings for plan development, but expanded engagement based on community input and recognition of the outreach guidance provided by this proviso and the equity analysis tool, to include 22 stakeholder interviews, four focus groups, and two community forums between 2017-2019.

Community input influenced the development of plan vision and principles, policies, and action items. The Draft Subarea Plan also offers opportunities for community input into the creation of the proposed, Equitable Housing Development Program and Community-Desired Amenities Incentives. It also offers community members the opportunity to identify existing cultural assets that could be impacted as well as options for their preservation and mitigation.

Engagement of Stakeholders and Populations of Concern

Appendix E provides a detailed summary of community engagement activities, including specific stakeholder groups and populations who attended these events. Exhibit 6 presents a summary of this engagement, organized by the stakeholder groups and population of concern identified in this report. When identifying stakeholders and community leaders to directly engage during this process, King County planners consulted with a staff Community Liaison who has a background with the Skyway-West Hill community. King County did not initiate this Equity Impact Review until after most of the engagement was conducted. Therefore, efforts to reach some of these groups are not well documented, and it is quite possible that some groups did not receive significant, or any, outreach/engagement. Draft plan review and implementation offer an opportunity to make further connections to ensure they have a voice in the community change that may affect them.

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9 Since this analysis is being conducted prior to the draft plan being issued, recommendations for engagement during the implementation stage (Phases 4) are provided below.

10 The liaison, Ernesto (Bong) Santo Domingo, works for King County Department of Local Services.

<table>
<thead>
<tr>
<th>Population of Concern</th>
<th>Relevant Engagement and Potential Limitations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Language Communities</td>
<td>Outreach and engagement targeted towards different linguistic groups was not well documented. The County did provide interpretation at some community events.</td>
</tr>
<tr>
<td>Racial and Ethnic Groups</td>
<td>Engagement with different racial and ethnic groups is not documented in the engagement materials. The 22 stakeholder interviews were intended to collect input from a broad cross section of the community, which included people of diverse racial and ethnic backgrounds. General engagements, such as community forums or focus groups, drew people of diverse racial and ethnic backgrounds. However, there is no documented engagement to specific racial and ethnic communities.</td>
</tr>
<tr>
<td>Youth</td>
<td>A group of youth from Creston Point participated in the focus group discussing the Martin Luther King Junior corridor. Records do not indicate whether additional engagement was targeted at youth.</td>
</tr>
<tr>
<td>Seniors and Elderly</td>
<td>There is no documented outreach to older adults in the community. Some older adults are likely to have participated in community forums or other general engagements.</td>
</tr>
<tr>
<td>Persons with Disabilities</td>
<td>There is no documented outreach that was targeted towards persons with disabilities.</td>
</tr>
<tr>
<td>Neighborhoods</td>
<td>Several engagements were directed to the Skyway neighborhood including meetings with the community group, Skyway Solutions and attendance at the Skyway Block Party. The County conducted a focus group on the Martin Luther King Junior Way South area. There was also a focus group on views, which likely attracted residents of Bryn Mawr. There is no documented focus on the Rainier Avenue Business District area.</td>
</tr>
<tr>
<td>Renters and Low-Income</td>
<td>Outreach and engagement to address the perspectives of renters or owners was not well documented. The Martin Luther King Junior Way South Focus Group took place at Creston Point Apartments and likely attracted mostly renters. The Scenic Views Focus group likely attracted property owners. It is likely that participants in community forums and other general engagement were comprised of both owners and renters, but it is not clear.</td>
</tr>
<tr>
<td>Households</td>
<td></td>
</tr>
<tr>
<td>Businesses</td>
<td>The County conducted a Commercial District Focus Group for the Skyway Business District and some of the stakeholder interviews included people who worked in the study area. Businesses in the Martin Luther King Junior Way and Rainier Avenue Businesses Districts may not have been engaged. Future developers and builders, or those looking to invest in the community have not been engaged, but their engagement may be more appropriate in the draft plan review and implementation phases.</td>
</tr>
<tr>
<td>Community Service Providers</td>
<td>It is not clear if community service providers were included as part of general engagements for the plan, but efforts to specifically include them are not documented.</td>
</tr>
</tbody>
</table>

Source: King County, 2019; BERK, 2019.
ASSESSMENT OF EQUITY AND COMMUNITY CONTEXT (PHASE 2)

This section summarizes the concerns raised by community members engaged in the subarea planning process. It also provides a discussion of King County’s Determinants of Equity framework, including an assessment of the potential of the Draft Subarea Plan to affect the ability of different populations of concern in Skyway-West Hill to access and benefit from those Determinants. Finally, we discuss potential unintended equity-related outcomes that could result from implementation of the Subarea Plan, with attention to differences in the vulnerabilities of different populations of concern.

Concerns Raised by Community Members and Stakeholders

Appendix E provides a summary of major topics identified by stakeholders and community members engaged by King County during the subarea planning process. Here we review key themes and discuss equity themes that emerged during the engagement process. The following section includes a more detailed discussion of the relationship between actions proposed in the Draft Subarea Plan and these concerns.

Desire for Equitable Development

Many of the respondents are either anticipating growth and change or hoping for it. Many respondents listed types of establishments they’d like to see more of in the neighborhood, such as restaurants, grocery stores, and pharmacies. However, they also raised questions and concerns, especially related to commercial development, and about the quality of the development to come. Are the options going to be diverse? Are they going to be conveniently accessible to the local population? Will the new businesses offer more breadth in services and quality of goods than what is currently available? Will new commercial development contribute to displacement?

Many community members expressed strong concerns about both gentrification (changes to the neighborhood that cater to a new, wealthier group of residents) and displacement (when families are forced to move from their homes involuntarily due to the termination of their lease, rising housing costs, or

LIMITATIONS ON UNDERSTANDING OF EQUITY IN COMMUNITY CONTEXT

The analysis in this report relies on records from outreach and engagement already conducted by the County from 2018 to early-2019. This previous work did not go through a formal Equity Impact Review. As a result, there may be unidentified community priorities and concerns. In addition, some of the engagement methods may not have been fully effective at learning about community concerns about equity depending on the topics of discussion, the questions asked, the format of the engagement, and the materials presented.

To identify community priorities and concerns, engagement should include discussion of topics such as:

- Important existing community businesses, landmarks, amenities in addition to those that are desired.
- Formal and informal social supports and support networks.
- Housing security and insecurity for both renters and homeowners.
- Specific community needs for different types of households including families with children, older adults, and multi-generational households.
- Community definitions of key concepts such as affordability, equity, sustainability, vitality.
- Issues of safety and security.
- Access and barriers to transportation, including transit and walkability.
other factors). They described personal experiences losing friends and community members to displacement and expressed hope that the Subarea Plan could include strategies to prevent this from occurring.

Public Safety

Many residents expressed that there are perceptions of fear in some neighborhoods. Some of these residents mentioned the need for improvements to police response times and visibility in the community. Others called for better street lighting and sidewalks to improve connections between streets and neighborhoods.

Health and Well-being

Several stakeholders identified the need for more medical services in the area, such as doctors, dentists and pharmacies. Community members also expressed the concern that they are effectively in a food desert, particularly with regards to quality fresh produce and healthy options. Access to recreation and open space, including Skyway Park, also came up as a concern that could be addressed through investments in sidewalks, lighting, better access and pathways.

Affordable Housing

Many residents see affordable housing in the community to be an asset and are supportive of its protection and creation. Some expressed the need for affordable housing that includes supportive services to address the needs of vulnerable populations.

Determinants of Equity

Many of the community concerns described above and in Appendix E are closely related to the Determinants of Equity, identified by King County’s Office of Equity and Social Justice. This is a framework for evaluating and measuring access to resources and opportunity that promote equity of outcomes. It identifies 14 Determinants of Equity and associated metrics for evaluating potential disparities at the neighborhood scale. Exhibit 7 presents each Determinant of Equity along with an assessment of the potential direct and indirect impacts of implementing the Draft Subarea Plan. Since the plan focuses on allowable land uses, development conditions, and developer incentives, it does not have any direct impacts on Determinants of Equity. But land use changes being proposed in the plan does have great potential to influence the kind of new development which could occur in the future. Some of these future land use changes could impact Determinants of Equity for some or all residents of Skyway-West Hill.

Exhibit 7 identifies these potential indirect impacts. Following this table is a discussion of potential unintended equity-related outcomes, including the distribution of benefits and burdens associated with land use change.

### Exhibit 7. Potential Direct and Indirect Impacts to Determinants of Equity

<table>
<thead>
<tr>
<th>Determinant of Equity</th>
<th>Brief Description from KC Office of Equity and Social Justice</th>
<th>Potential Direct and Indirect Impacts of Proposed Changes in Draft Skyway-West Hill Subarea Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early Childhood</td>
<td>Early childhood development that supports nurturing relationships, high quality, affordable childcare, and early learning opportunities that promote optimal early childhood development and school readiness for all children.</td>
<td>No direct impact. Some potential for indirect impacts. The Community-Desired Amenity Program could include incentives to include child-care facilities within new developments. Increasing the supply of quality childcare facilities in the area could be a benefit to families who can afford the care. However, this change may not have an impact on the affordability of childcare for lower-income families.</td>
</tr>
<tr>
<td>Education</td>
<td>Education that is high quality and culturally appropriate and allows each student to reach his or her full learning and career potential</td>
<td>No direct impact. Limited potential for indirect impacts.</td>
</tr>
<tr>
<td>Jobs and Job Training</td>
<td>Jobs and job training that provide all residents with the knowledge and skills to compete in a diverse workforce and with the ability to make sufficient income for the purchase of basic necessities to support them and their families</td>
<td>No direct impact. Some potential for indirect impacts if land use changes are successful at encouraging a more vibrant local business district that creates opportunities for new businesses and jobs. However, Skyway residents would need to compete with outsiders for those jobs and business opportunities. Existing disparities with regards to possessing the requisite knowledge and skills to be most competitive will remain.</td>
</tr>
<tr>
<td>Health and Human Services</td>
<td>Health and human services that are high quality, affordable and culturally appropriate and support the optimal well-being of all people.</td>
<td>No direct impact. Limited potential for indirect impacts.</td>
</tr>
<tr>
<td>Food Systems</td>
<td>Food systems that support local food production and provide access to affordable, healthy, and culturally appropriate foods for all people.</td>
<td>No direct impact. Some potential for indirect impacts. The Community-Desired Amenity Program could include incentives for projects that include grocery stores or other healthy food sources. However, the fact that these healthy food sources may be less affordable than convenient stores and fast food restaurants could remain.</td>
</tr>
<tr>
<td>Parks and Natural Resources</td>
<td>Parks &amp; Natural Resources that provide access for all people to safe, clean and quality outdoor spaces, facilities and activities that appeal to the interest of all communities.</td>
<td>No direct impact. Some potential for indirect impacts. The Community-Desired Amenity Program could include incentives for developers to add on-site or off-site amenities, such as improving the accessibility of parks and trails with new sidewalks or pathways.</td>
</tr>
<tr>
<td>Determinant of Equity</td>
<td>Brief Description from KC Office of Equity and Social Justice</td>
<td>Potential Direct and Indirect Impacts of Proposed Changes in Draft Skyway-West Hill Subarea Plan</td>
</tr>
<tr>
<td>---------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Built and Natural Environment</td>
<td>Healthy built and natural environments for all people that include mixes of land use that support: jobs, housing, amenities and services; trees and forest canopy; clean air, water, soil and sediment.</td>
<td>No direct impact. High potential for indirect impacts. The Plan includes zoning changes to expand opportunities for commercial and mixed-use development. The Community-Desired Amenity Program could include incentives for additional amenities to enhance walkability and community vitality. Low potential for impacts to trees and forest canopy, clean air, water, soil, or sediment.</td>
</tr>
<tr>
<td>Transportation</td>
<td>Transportation that provides everyone with safe, efficient, affordable, convenient and reliable mobility options including public transit, walking, carpooling and biking.</td>
<td>No direct impact. Some potential for indirect impacts. Zoning changes include some increases in residential density along transit corridors. This has the potential to enable more people to live within easy walking distance of frequent transit service. Additionally, the Community-Desired Amenity Program could include incentives for developers to provide community assets such as sidewalks and pedestrian networks or street lighting that can improve walkability and perceptions of safety. Such changes could result in increased access to transit for both new and existing residents.</td>
</tr>
<tr>
<td>Community Economic Development</td>
<td>Community Economic Development that supports local ownership of assets, including homes and businesses, and assures fair access for all to business development and business retention opportunities</td>
<td>No direct impact. Some potential for indirect impacts. The Plan includes zoning changes to expand opportunities for commercial and mixed-use development. Action 4 from the draft Plan calls for small-scale commercial incentives within the Skyway Business District to support smaller-scale commercial development opportunities and encourage locally owned and culturally significant businesses.</td>
</tr>
<tr>
<td>Neighborhoods</td>
<td>Neighborhoods that support all communities and individuals through strong social networks, trust among neighbors and the ability to work together to achieve common goals that improve the quality of life for everyone in the neighborhood.</td>
<td>No direct impact. Some potential for indirect impacts. The Community-Desired Amenity Program could include incentives for assets or improvements that promote community gatherings, more vibrant community business districts, and/or more active use of public spaces. These could include community-identified cultural spaces, community green spaces or viewpoint plazas, improved sidewalks and pedestrian networks, streetlights, a community center, public meeting spaces, farmers markets, arts facilities, etc.</td>
</tr>
<tr>
<td>Housing</td>
<td>Housing for all people that is safe, affordable, high quality and healthy.</td>
<td>No direct impact. High potential for indirect impacts. Zoning changes proposed in the Draft Subarea Plan include increased to allowable density in some residential and mixed-use zones. These changes could provide more rental and ownership housing options in the neighborhood. These changes also include requirements for 10% of new housing units to be reserved for low-income households (70% of AMI or below). If developers choose to build housing in these zones, the requirements could result in additional supply of affordable housing options.</td>
</tr>
<tr>
<td>Determinant of Equity</td>
<td>Brief Description from KC Office of Equity and Social Justice</td>
<td>Potential Direct and Indirect Impacts of Proposed Changes in Draft Skyway-West Hill Subarea Plan</td>
</tr>
<tr>
<td>-----------------------</td>
<td>-----------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Community and Public Safety</td>
<td>Community and public safety that includes services such as fire, police, emergency medical services and code enforcement that are responsive to all residents so that everyone feels safe to live, work and play in any neighborhood of King County.</td>
<td>No direct impact. Some potential for indirect impacts. Fire, police, emergency medical services, and code enforcement are not addressed in the Draft Subarea Plan. However, as discussed above, some land use outcomes have the potential to influence perceptions of neighborhood safety. Expanded opportunities for commercial and mixed-use development could result in more businesses and activity in commercial districts. The Community-Desired Amenity Program could include incentives for developers to provide amenities like sidewalks, pedestrian networks, and street lighting. These too can encourage more activity in public spaces and discourage criminal activity.</td>
</tr>
<tr>
<td>Law and Justice</td>
<td>A law and justice system that provides equitable access and fair treatment for all.</td>
<td>No direct impact. Very limited potential for indirect impacts.</td>
</tr>
</tbody>
</table>
Potential Unintended Equity-Related Outcomes

Displacement

The Draft Subarea Plan expresses a vision of equitable development, where all current residents can have the opportunity to share in the benefits of land use change. These benefits could potentially include new amenities like sidewalks and streetlights, a more vibrant community business district with opportunities for local businesses that reflect the diversity of the community, or new community gathering places. However, these kinds of amenities also have potential to make the area more desirable to prospective renters and homebuyers, which can increase competition for housing and drive up costs. This can lead to economic displacement, where some current residents can no longer afford the cost of housing and are therefore forced to move elsewhere in search of lower costs. Redevelopment can also involve the demolition of existing housing or businesses, which can contribute to physical displacement.

Housing costs in Skyway-West Hill are already rising. Exhibit 8 shows how much the rents have increased in recent years. Average rents in 2019 are over 40% higher than they were in just 2010, while wages for low-income workers have not increased nearly as much. Yet rents are still significantly lower in Skyway-West Hill than they are in many neighborhoods in South Seattle. One reason for this difference is the relative lack of amenities compared to many other neighborhoods.

Exhibit 8. Average Apartment Rent Per Square Foot in Skyway-West Hill, 2000-2019

$1.75
$1.50
$1.25
$1.00
$0.75

$0.94
$1.09
$1.55


Each time a family, household, or business is displaced it can leave a hole in the social fabric—the network of relationships that can contribute to a thriving community and provide residents with mutual support in times of need. So, displacement can have a cascading effect, where one instance of displacement can precipitate and even accelerate additional displacement in the same neighborhood, including cultural displacement where residents are compelled to move because the people and institutions that make up their cultural community have left the area.

The Skyway-West Hill area is already experiencing economic displacement pressure due to rising housing costs. Any increase in displacement pressures resulting from the Subarea Plan would have significant equity implications. Fortunately, the Subarea Plan includes strategies for avoiding or mitigating physical displacement as well as promoting equitable development. This includes new requirements for developers to include income-restricted units affordable to low-income households in their buildings. The potential effectiveness of these strategies will be addressed in the following section.
Limited Opportunities for Homeownership and Asset Building

Providing pathways to homeownership is an important aspect of achieving community economic development as well as supporting neighborhood stability and vitality. Homeownership enables individuals and families to build assets over time and reduces their vulnerability to increases in market rents. While the Draft Subarea Plan includes changes to increase capacity for multifamily housing, such as apartment buildings or condominiums, it does not significantly expand opportunities to develop “missing middle” housing options such as townhomes, tiny or cottage housing, or small lot single family homes.12 As a result, it misses an important opportunity to increase the supply of smaller ownership housing products. These housing types are typically more affordable to moderate- and middle-income households than single-family homes and can therefore provide a gateway to homeownership.

ANALYSIS OF POTENTIAL EQUITY IMPACTS (PHASE 3)

The Skyway-West Hill subarea will continue to grow and change over time, whether King County implements the Draft Subarea Plan or it takes no action. If trends continue, and housing costs continue to increase across the entire Seattle metropolitan region, then housing costs in Skyway-West Hill will also continue to rise. This will cause increasing housing cost-burden pressures on many existing residents and likely contribute to continued economic displacement. Likewise, many residents in Skyway-West Hill will continue to lack the same level of access to many Determinants of Equity found in other areas of the county. The purpose of this analysis is to determine whether implementing the Subarea Plan is likely to lead to more equitable outcomes than taking no action. It is also to provide recommendations regarding steps King County can take to promote more equitable outcomes.

As noted above, implementing the Subarea Plan will not have direct impacts on any Determinants of Equity or directly address any community concerns. Instead, the impacts will be indirect. This is because the King County Council has limited subarea plans to only consider land use changes.13 The changes to zoning, development conditions, and developer incentives proposed in the Draft Subarea Plan are intended to influence the actions of private developers or others who wish to build in Skyway-West Hill. The approach is to increase the likelihood that new growth will support equitable development by addressing community needs and desires such as expanding the supply of affordable housing, providing new sidewalks and street lighting, and promoting a thriving business district with opportunities for locally owned and culturally significant businesses.

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12 King County Code does allow for townhomes in the R-6 Zone (K.C.C. 21A.08.030), but limits on allowable density per acre make such projects less feasible.

13 In 2018 the King County Council limited subarea plans to only consider land use changes and not include other needs identified by the community. As such, the Draft Subarea Plan is limited in what it can offer the community that may have more direct impacts.
The Subarea Plan includes several changes and action items that, collectively, will have an impact on the decision of developers to move forward with projects in the Skyway-West Hill area, as well as the types of projects that developers may propose to build. Developers typically have a minimum “rate of return”, or profit margin, that they require in order to secure financing to move a project forward. They also typically select development sites that are most likely to provide the needed rate of return (or higher) in order to minimize their financial risks. An exception to this rule would be nonprofit or other mission-based developers who may have an interest in developing in Skyway-West Hill to support community objectives or address community needs. However even these kinds of developers must select projects that are financially feasible.

The following sections present a summary of the most relevant changes and action items proposed in the Draft Subarea Plan. Along with the summary is a general discussion of the potential of those changes/actions to encourage or discourage desired forms of development in Skyway-West Hill. Also included is a discussion of the equity implications compared to taking no action.

### Housing Supply and Affordability

The Draft Subarea Plan includes some targeted zoning changes along transit corridors, the business districts, Dimmitt Middle School, and Skyway Library. These changes will allow developers to build housing at higher levels of density. Since developers will be able to build bigger apartment buildings with more units per acre, they may be able to get more revenue from rents on the same parcel then they were prior to the upzone. This provides them with an additional incentive to build housing in Skyway-West Hill. However, these zoning changes come with new development conditions that require that 10% of newly constructed housing units be reserved for households with incomes at or below 70% of AMI. For these units, rents will likely be lower, thus diminishing potential revenues for a developer/building owner. Building owners may have additional administrative costs associated with complying with the affordability requirements, such as maintaining and updating proof of income eligibility records for the occupants of affordable units. A prospective developer would need to consider the relative costs and benefits of these changes on their expected rate of financial return.

One way to evaluate the potential impacts of these changes on the likelihood of new development in Skyway-West Hill is to compare the incentives and requirements for affordable housing proposed in the Draft Subarea Plan to those that exist in neighboring jurisdictions. Exhibit 9 presents a comparison. The areas identified in this table all have similar multifamily and mixed-use zoning at a similar range of densities. Each of the three neighborhoods have similar average rents, indicating that a developer could
expect similar revenues from market-rate apartment units in each neighborhood. However, each area has different incentives and requirements that would impact the rate of return a developer could receive. For instance, the Sunset area in Renton includes no affordable housing requirement and it offers an eight-year property tax exemption (MFTE) for the value of new residential development. This can significantly lower costs for a building owner, making development in Sunset a more attractive option.

Another example is in the Rainier Beach Urban Village in Seattle. Under new requirements, developers are required to provide 5% of units affordable to households at 60% AMI or less. While the AMI level is slightly less than proposed by King County for Skyway-West Hill, Seattle’s requirement only calls for half as many units to be set aside as affordable. Additionally, Rainier Beach includes a Link Light Rail stop. This is an amenity that would likely increase demand for housing compared to Skyway-West Hill. Therefore, developers may be able to demand more in rents for newer apartment units in Rainier Beach compared to Skyway-West Hill.

Exhibit 9. Rents and Affordable Housing Requirements in Skyway-West Hill (Proposed) and Neighboring Jurisdictions

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Area</th>
<th>Average Rent Per Sq.Ft.*</th>
<th>Multifamily Tax Exemption (MFTE) Development Incentive</th>
<th>Affordable Housing Requirement</th>
<th>In Lieu Payment14</th>
</tr>
</thead>
<tbody>
<tr>
<td>King County</td>
<td>Skyway-West Hill</td>
<td>$1.55</td>
<td>None</td>
<td>10% of units affordable to 70% AMI (proposed)</td>
<td>None</td>
</tr>
<tr>
<td>City of Renton</td>
<td>Sunset Area</td>
<td>$1.53</td>
<td>8-year MFTE, or: 12-year MFTE: 20% of units affordable to 80% AMI15</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>City of Seattle</td>
<td>Rainier Beach Urban Village</td>
<td>$1.57</td>
<td>MFTE – 20-25% of units affordable to 50% of AMI16</td>
<td>5% set-aside for 60% AMI + $5.58 per sq. ft. for commercial area</td>
<td>$5.58 per sq. ft.</td>
</tr>
</tbody>
</table>

* Average rent per square foot is based on all apartment buildings in area. In many neighborhoods, newer apartment buildings can demand higher rents when built to luxury standards. However, the rents shown here provide a good comparison of the relative difference in rents between neighborhoods based on the existing housing stock.

Source: Costar, 2019; King County, 2019; City of Seattle, 2019; City of Renton, 2019; BERK, 2019.

While the comparison in Exhibit 9 is far from comprehensive, it does raise questions about the likelihood that for-profit developers will choose to build in Skyway-West Hill and provide the affordable housing benefits given the other options available in nearby jurisdictions. Therefore, there is potential that implementing the Subarea Plan could reduce new multifamily housing development activity in Skyway-

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14 Some jurisdictions offer an In Lieu payment option as an alternative route of compliance with affordable housing requirements. Developers selecting this option can pay a fee instead of providing the requisite number of affordable units. These payments can then be used by the jurisdiction to support affordable housing development elsewhere.

15 See https://www.codepublishing.com/WA/Renton/#/Renton04/Renton0401/Renton0401220.html#4-1-220

16 See https://www.seattle.gov/housing/housing-developers/multifamily-tax-exemption#legislation
West Hill compared to taking no action. While this outcome may reduce potential for the physical displacement of vulnerable Skyway-West Hill residents as a result of redevelopment, it would also undermine the Plan's overarching principle of encouraging equitable development. In addition, by reducing new housing development, this outcome could increase competition for the current supply of housing. This may increase potential for driving up housing costs and increase economic development pressure.

One solution the County can explore is reducing or eliminating the affordable housing requirement for the first developer to build in a particular neighborhood. Developers are often risk-averse and may avoid being first to build in a neighborhood that has not seen any recent development activity. Once a few projects have been built, bringing with them new amenities, subsequent projects would likely be seen as less risky. So, reducing or eliminating requirements for the first project is one way the County could encourage investment and prime the market to make it more likely that subsequent developers would find projects with affordable housing requirements to be financially feasible.

If developers do start building projects that include required affordable housing, local residents would need to compete with others across the region for the limited supply of affordable units. The County could consider exploring the legality of development regulations that prioritize local residents or those who were recently displaced for housing in new affordable units. This concept is introduced in the Equitable Housing Development Program, but the Draft Subarea Plan doesn't indicate this program would apply to the multifamily zones with new affordable housing requirements.

Affordable Housing Preservation

The Draft Subarea Plan includes new development conditions that would require any proposed development of existing mobile home parks comply with the Equitable Housing Strategies Program. The intent of this program is to evaluate and address the impacts of large developments on affordable housing with a focus toward its retention or creation. The details of this program would be developed in consultation with community members and with final recommendations transmitted to the King County Council by September 30, 2021.

Mobile home parks and manufactured housing communities typically provide housing at a cost below standard market rents. While some residents may own their physical home, the land is leased. Even if a resident wanted to move their home, options are often limited by the age and condition of their home, the cost of transport, and the availability of a site to move it to. Therefore, the sale and redevelopment of a mobile home park would most likely result in the immediate physical displacement of all of its residents. It is also likely that most or all of these displaced residents would struggle to find other affordable housing within the Skyway-West Hill area. This outcome would have severe and immediate equity implications. From an equity perspective, the placement of a development condition on mobile home parks that requires compliance with a program designed to proactively address and mitigate these potential impacts is a significant improvement over taking no action.

As the details of the Equitable Housing Strategies Program are yet to be defined, we cannot evaluate its potential effectiveness or who would be most likely to experience the benefits and burdens. That said, it is appropriate for the County to work closely with community members to identify strategies which address local needs and circumstances. During this process it will be important to consider whether prioritizing the preservation of mobile and manufactured home communities is an appropriate longer-term strategy to support housing affordability. The quality of many of these homes may be deteriorating,
creating the potential for unsafe and unhealthy living environments.

**Commercial Districts**

In addition to zoning changes to expand opportunities for commercial and mixed-use development in the Skyway Business District, the Draft Subarea Plan includes several changes that will shape the scale and format of new development. The intent of these changes is to encourage smaller-scale neighborhood-serving businesses and commercial districts that are pedestrian-oriented. In addition, the plan includes an action item to create an incentive program to encourage developers to provide opportunities for locally-owned and culturally significant businesses.

These proposed changes and incentives have few drawbacks from an equity perspective, and they offer some potential for benefits for those seeking more cohesive and vibrant neighborhood business districts. The most significant risk to new commercial development is the loss of existing businesses valued by community members. A new policy to involve community members during permit and project review to identify important existing cultural assets impacted by development proposals can help to mitigate this risk (see discussion below).

**Community Character and Cultural Assets**

The Draft Subarea Plan includes an action item to create new Community-Desired Amenities Incentives to provide bonuses to developers and property owners in exchange for the voluntary preservation or provision of cultural assets and community amenities in Skyway-West Hill. These bonuses could include allowing for additional density (for example, larger apartment buildings with more housing units per acre), deviations from typical development standards like parking requirements, or payment into a county fund to support new affordable housing development. The details of this program would be developed following the adoption of the Subarea Plan in consultation with community residents, with a deadline of transmittal to the King County Council by January 31, 2022. The plan includes a new policy to involve community members to identify important existing cultural assets impacted by development proposals during permit and project review. This seeks to identify opportunities for cultural asset preservation or to identify strategies to make up for the loss of community character.

As the details of the Community-Desired Amenities Incentives are yet to be defined, we cannot evaluate their potential effectiveness at encouraging for-profit developers to include community-desired amenities or preserve cultural assets in their development proposals. For incentives to be most effective, they typically need to provide enough value to developers (in terms of reduced development costs or increased opportunity for revenue following development) to offset the cost of providing the community amenity. So, the County may consider conducting additional market and financial feasibility analysis to help determine the appropriate level at which to set incentives toward increasing the potential for their effectiveness.

In some cases, the developer sees value in providing a community amenity due to its potential to promote a more vibrant neighborhood environment and, potentially, increase demand for the housing or services provided in the new development. King County may be able to play a role in facilitating community partnerships with mission-based or nonprofit developers, and the incentives could play an important role in helping make these kinds of projects feasible.

From an equity perspective, there are benefits to proactively engaging residents to identify important existing cultural assets during project review. And there are likely to be few drawbacks to the proposed
incentive program. However, the County should proactively consider that a very successful incentive program could have the unintended consequence of increasing demand for housing and business establishment in the area. This outcome could increase physical, economic, and cultural displacement pressures within the immediate vicinity, as discussed earlier in the report. However increased demand for housing in the area would also increase the likelihood that developers choose to build new multifamily housing in zones with new affordable housing requirements, an outcome that could mitigate the impacts of displacement (see discussion of Housing Supply and Affordability above).

IMPLEMENTATION (PHASE 4)

The Draft Subarea Plan includes several action items for implementation during the 12 or so months following plan adoption. Here we provide recommendations to ensure equity considerations are integrated through this process. We also provide guidance for monitoring and measuring outcomes.

Continued Community Engagement to Guide Implementation

Community engagement is important to achieving the purpose of the plan, which is to “Reflect the community’s desire for equitable development and economic growth that enriches its cultural diversity.” This purpose is rooted in understanding the community’s values and helping them to bring about their vision of a thriving, equitable, diverse community. Thoughtful community engagement is key to equitable development. This involves working through the steps of the Equity Impact Review Process for each action item to ensure that all voices have the opportunity to be heard, that community input is addressed as implementation proceeds, and that intended and unintended consequences are considered prior to action.

Engagement and Outreach Guidance

- Develop a public engagement plan to guide plan implementation. The public engagement plan should include outreach and engagement objectives for specific tasks and overall implementation and explain how the engagement process can influence project results or outcomes. It should identify key groups, communities, and stakeholders to consult, drawing on Phase 1 of this equity review as a baseline as well as input gathered in the planning process so far. The plan should cover proposed methods of outreach and engagement, and accommodations and supports that need to be employed to ensure accessibility and remove barriers to engagement for groups that have been underrepresented in community conversations so far. The County should widely distribute the draft plan and take public comment on it before finalization.

- Provide adequate time for outreach and engagement for each step of the process for every action item. Outreach time should include notice and advertising through typical print and electronic channels, as well as time for information to be distributed through informal, social networks and by trusted advisors that provide key connections to groups that have been underrepresented in participation. Engagement should include time for community meetings as well as events developed to gather input specifically from hard to reach groups.

- Design public engagement events to be inclusive, accommodating, and supportive of participation by the whole community. This includes serving food at events and meetings, providing childcare, providing translated materials and interpretation, and assisting with transportation. Whenever possible, hold events in popular community locations and gathering spaces where people feel
comfortable. Consider providing financial support such as: paying an honorarium or fee to community organizations that use their social and community networks to support participation, providing gift cards or cash to focus group participants, or providing bus tickets or another similar benefit to those who participate in meetings or events. Where possible, use local community providers to supply these supports.

- Provide a variety of ways to exchange information and communicate ideas. Consider traditional methods of communication and engagement based on art, storytelling, and conversation. Modern technology can enhance such methods with the use of video, social media, and photographs.

- After work products are completed, adopted, or implemented advertise process results with both those that participated and to the community at large. Highlight the effects of community participation, how input shaped results, and ways the community can continue to be involved in ongoing work efforts. Use outreach approaches identified in the public engagement plan as well as any new channels of communication developed during the engagement process.

**Community Capacity Building Guidance**

- Prepare a short guide to help people understand how their participation can impact plan outcomes and how they can engage in implementing the plan. Make the guide available in multiple languages and distribute it widely throughout the community in hard copy and electronic formats.

- Build community capacity for engagement by hosting leadership workshops that build skills in community organizing and help people understand County (and potentially other local government) processes and opportunities to become involved in local actions and decision making. Connect people with the appropriate local contacts for a variety of potential needs and concerns. Consider developing a meeting-in-a-box kit that leaders of community groups can use to improve understanding of community engagement and local government contacts and other helpful resources.

- Consider appointing a community advisory board to partner with the County by providing input and collaborating on direction for plan implementation steps. It could also advise on public engagement and help design engagement events. The board could be comprised of positions representing different community interests, demographics, or geographies to achieve a balance of perspectives. Meetings would be advertised and open to the public to allow the opportunity for the community and staff to work together directly to develop and refine implementation actions. The advisory board could host community meetings, public workshops, and other events to solicit broader community input.

**Performance Monitoring**

It is important that the County develop and maintain a performance monitoring system to measure outcomes associated with the goals, policies, and actions of the Subarea Plan. This system should be part of a foundation on which the County tracks and evaluates equity outcomes in Skyway-West Hill as well as the impacts of actions by the County to support equitable outcomes. However, all performance measures are imperfect in their ability to measure issues of concern. Care must be taken when interpreting measured outcomes and their relationship to actions called for in the Subarea Plan. Likewise, it is essential that community members and stakeholders be engaged in reviewing these measured outcomes,
interpreting their significance, and identifying important themes that cannot be tracked by these metrics. The local knowledge that Skyway-West Hill community members can contribute to this process will be an invaluable resource to support ongoing learning.

Exhibit 10 presents a potential framework for measuring outcomes associated with goals, policies, and actions proposed in the Draft Subarea Plan. This framework should be refined in collaboration with relevant County departments and a community advisory board during the implementation phase of the Subarea Plan. Following development of this framework, the County should develop a process for annual reporting back to the community on outcomes.
## Exhibit 10. A Performance Monitoring Framework for the Skyway-West Hill Subarea Plan

<table>
<thead>
<tr>
<th>Objective/Policy</th>
<th>Potential Measure</th>
<th>Potential Monitoring Approach</th>
<th>Notes on Interpretation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timely implementation of the Subarea Plan</td>
<td>Completion of Action Items 1-6</td>
<td>Count number of action items completed (e.g., adopted by council) by deadlines set in Subarea Plan.</td>
<td>▪ Deadlines vary by action. So, reporting should be clear regarding whether actions are being addressed on schedule.</td>
</tr>
<tr>
<td>Increase Housing Supply (SWH-1 &amp; SWH-3)</td>
<td>Total units in building starts.</td>
<td>Annual data pull from King County’s permit data system. Compare rate of new development in Skyway-West Hill to that of neighboring jurisdictions and region as a whole.</td>
<td>▪ Tracking units by type (apartments, condominiums, townhomes, etc.) will show diversity of new housing choices.</td>
</tr>
<tr>
<td>Affordable Housing Production (SWH-4)</td>
<td>New affordable units in building starts.</td>
<td>Annual data pull from King County’s permit data system. (The County may need a new system for tracking affordable units associated with new development.)</td>
<td>▪ Tracking these units by size (studios, 1-bedroom, 2-bedroom, etc.) will help to inform if additional requirements are necessary to better align production with affordable housing needs.</td>
</tr>
<tr>
<td>Affordable Housing Preservation (SWH-5 &amp; SWH-6)</td>
<td>Total units lost to demolition or change of use.</td>
<td>Annual data pull from King County’s permit data system.</td>
<td>▪ Not all demolitions result in displacement. ▪ Track the types of units lost.</td>
</tr>
<tr>
<td>Addressing physical displacement risk due to new development (SWH-6)</td>
<td>Total low-income renter households displaced as a result of demolition, renovation, or change of use.</td>
<td>Develop new requirements for a tenant relocation assistance ordinance similar to the one in Seattle. Rquire property owners and developers to get a tenant relocation license before issuing permits to allow demolition, change of use, or change in use restrictions (for example a property is no longer required to rent only to low-income renters under a federal program).</td>
<td>▪ It is difficult to measure physical displacement without requirements for developers to report on the status of renters whose leases are terminated in advance of demolition. ▪ Seattle has revised their Tenant Relocation Assistance Ordinance (TRAO) to improve developer compliance. Consider reaching out to hear lessons learned.</td>
</tr>
</tbody>
</table>

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17 See: [https://www.seattle.gov/sdci/codes/codes-we-enforce-(a-z)/tenant-relocation-assistance-ordinance](https://www.seattle.gov/sdci/codes/codes-we-enforce-(a-z)/tenant-relocation-assistance-ordinance)
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</table>
| Preserving and enriching cultural diversity                                    | Diversity Index\(^{18}\) (Measures probability that two individuals chosen at random would be of different races or ethnicities). | Two options:  
- Pull data from PolicyMap on a yearly basis for Census tracts in study area. Or,  
- Calculate for Bryn Mawr-Skyway Census Defined Place on annual basis based on ACS data. | A steady or increasing Diversity Index score indicates the community may be maintaining its racial, ethnic, and cultural diversity.  
This indicator is based on estimates from a 5-year survey so it is poor at measuring short-term changes. |
| Encourage economic opportunity and vitality (SWH-7, 8, 10, 11, 12, 13)         | Jobs located in Skyway-West Hill.                                                                           | Annual data pull from Washington State Employment Security Department.                                            | Consider breakdowns by sector and wage level. |
| Promote locally-owned and culturally significant businesses (SWH-9)            | Number of projects that make use of Small-Scale Commercial Incentives (SWH Action 4).                         | Annual data pull from King County’s permit data system. (The County may need a new system for tracking use of incentives). | These incentives are not yet drafted. Additional measures may be needed to determine if the goal of the incentive is being achieved. |
| Support the provision of community-desired amenities (SWH-14)                  | Number of projects that make use of Community-Desired Amenities Incentives (SWH Action 5).                    | Annual data pull from King County’s permit data system. (The County may need a new system for tracking use of incentives). | If a menu of options is provided, the County should track which options are selected.  
Engage the community in determining whether the amenities provided are addressing needs and offer value. |
| Protect and enhance cultural assets (SWH-15)                                   | Number of assets identified during project review.                                                           | The County may need a new system for tracking cultural assets identified by the community during permit review. | There should be some standard for determining the threshold for defining a cultural asset. The community should be engaged in determining this threshold. |
|                                                                              | Number of identified assets that are preserved or enhanced.                                               | Annual data pull from King County’s permit data system. (The County may need a new system for tracking use of incentives for cultural assets preservation/enhancement). |                                                       |

\(^{18}\) See: [https://www.policymap.com/2015/01/mapping-racial-ethnic-diversity/](https://www.policymap.com/2015/01/mapping-racial-ethnic-diversity/)
ONGOING LEARNING (PHASE 5)

In addition to measuring outcomes, King County should evaluate the effectiveness of the Subarea Plan promoting those outcomes. As discussed above, most outcomes depend upon the decisions of individual property owners and developers to build in Skyway-West Hill. There are many factors that shape these decisions. A careful evaluation of the programs, incentives, and zoning changes in the Subarea Plan will enable King County to determine whether any changes or additional actions are necessary to support the realization of the plan’s Vision and Principles.

Evaluation should be informed by a process of ongoing learning enabled by an open feedback loop between the County and community. To support this feedback loop, the County should develop ongoing relationships with community members and stakeholders. While the focus will be on plan implementation, it’s important to understand that the community needs go beyond planning. This could mean connecting the community to additional resources inside and outside the County to support their needs. It also could mean participating in community events that may not be directly related to planning.

Evaluation should also be informed by more targeted engagement of stakeholders, such as developers and property owners, to understand how the changes in the Subarea Plan are affecting their decisions and the likelihood of promoting the kinds of development and amenities that the County seeks. It should also include outreach to local community members to gain local perspectives on how well new development and amenities provided through growth in Skyway-West Hill are aligning with community needs and desires.

An important part of engagement during this phase will be supporting capacity building for community organizing and sustained engagement with the County and other government agencies. This kind of capacity building should be a central focus of planning event and engagements. Coordination with other county agencies who are engaging community members will be important to avoid planning fatigue and help community members to understand the relationships between county functions.

Conclusion

King County has taken important steps towards integrating equity into the subarea planning process in meaningful ways. This Equity Impact Review shows that there are additional steps the County can take during the plan’s finalization, implementation, and evaluation. These steps include continued community engagement, with a focus on affected and vulnerable populations that may have been missed during the engagement that has occurred to date. They also include the development of a performance monitoring framework and system to support measurement of outcomes, evaluation of impacts, and ongoing learning. Equity should be a central focus of these activities.