



# Comprehensive Plan Update

## Racially Disparate Impact Analysis

### Introduction

In 2021, Washington State made changes to the housing element of the Growth Management Act (GMA). The changes move from language that encouraged affordable housing to language that requires Poulsbo to plan for and accommodate affordable housing, with specific requirements for identifying sufficient land capacity for moderate, low, very low, and extremely low-income households. The changes also require jurisdictions to identify housing policies and regulations that result in racially disparate impacts, displacement, or exclusion and start the work of undoing those impacts.

The purpose of this evaluation is to analyze the impacts of Poulsbo's housing policies and regulations through an equity lens – looking for places those policies may be having disparate impacts on particular racial or economic groups. This evaluation informs changes to policies in the Comprehensive Plan relating to housing as part of the City's Periodic Update.

The Washington State Department of Commerce (Commerce) developed a guidebook on how to respond to the need to consider Racially Disparate Impacts. The guidebook defines racially disparate impacts as: "When policies, practices, rules or other systems result in a disproportionate impact on one or more racial groups." The Poulsbo Racially Disparate Impact Analysis is based on the Commerce publication "Guidance to Address Racially Disparate Impacts" dated April 2023.

### Historical Context

#### Tribal Use and Early White Settlement

In the mid-1800s, settlers arrived in areas of the Pacific Northwest now encompassed by Kitsap County, where Indigenous Coast Salish peoples have lived since time immemorial. The arrival of settlers changed Coast Salish ways of life, specifically their claims and rights to use and occupy land. The Treaties of Medicine Creek in 1854 and Point Elliot in 1855 resulted in the ceding of millions of acres of land previously used and occupied by Coast Salish peoples to American settlers in a large swath of then-Washington Territory, including Kitsap County. Treaties also recognized sovereign tribal nations and established reservation homelands and laid out a complex set of land use rights for federally recognized tribes.

Originally Liberty Bay was one of many winter villages in the Usual and Accustomed (U&A) territory of the indigenous Suquamish People. They used this area of Poulsbo, known as Tcu-tcu-Lats, which roughly translates to "Land of the Vine Maples", to hunt, fish, clam, and gather indigenous plants and resources. In 1855, the Point Elliot Treaty was signed by their Chief, Chief Si?al or better known as Chief Seattle or Sealth. The Port Madison Indian Reservation was reserved in the Treaty of Point Elliot and along with the treaty the Suquamish people were able to reserve their right to fish, hunt, and gather freely today.

In the later part of the 19<sup>th</sup> century, white European settlers began emigrating to the Puget Sound region, some settling around the bay, which they called Dogfish Bay. The region was initially filled with homesteads and lumber industries; however, the appeal of the land attracted more settlers, most hailing from Norway and surrounding Scandinavian countries.

#### Black Exclusion Laws in Oregon Territory

Before territorial status in 1853 and statehood in 1889, Washington State was part of the Oregon Territory, which, from its onset, forbade Black people from settling in the area. Black exclusion laws covered what now encompasses Kitsap County until 1853 and stayed in place until the end of the American Civil War and the passage of the Fourteenth Amendment in 1868.

#### Asian Immigration and Exclusion

From the mid-1800s to early 1900s, in reaction to increased immigration from East Asia, federal and state governments severely limited the ability of immigrants of Chinese, Japanese, and other East Asian descents to naturalize, own land,



conduct business, and/or otherwise access the same rights offered to White American citizens or European immigrants.

### Japanese Internment

Six months after the bombing of Pearl Harbor in 1941, President Roosevelt signed Executive Order 9066, which authorized the forced evacuation of citizen and non-citizen residents of Japanese ancestry living along the West Coast to internment camps in the interior of the continent. Overall, the federal government, with support from state and local governments, incarcerated 12,892 persons of Japanese ancestry in Washington State. Many of those interned did not return to their communities after internment and those who did often faced continued discrimination, along with property loss or damage.

### Exclusionary Zoning

Starting in the early 20th century, municipalities around the country began to use zoning as an explicit tool of racial segregation. Even upon the Supreme Court ruling in *Buchanan v. Wiley* (1917) that racial zoning was unconstitutional, city planners continued to use zoning restrictions that limited the types and density of building to covertly exclude low-income and black, indigenous, and other people of color, or BIPOC, communities from wealthier and whiter residential districts. Exclusionary zoning policies produced systemic barriers to homeownership and educational opportunities for BIPOC, particularly Black residents. These practices also contributed to the racial wealth gap by limiting housing supply and excluding BIPOC communities from wealth generation opportunities that homeownership offers.

### Racially Restrictive Covenants

Racially restrictive covenants refer to documents such as deeds, plats, and homeowners' association bylaws used by property owners to restrict the sale of a property to someone based on their race. Starting in the early 20th century, racial covenants on property deeds gained popularity as a tool for restricting racial mixing in residential neighborhoods. Covenants were one of the many ways in which BIPOC residents, especially Black residents, were excluded from the emerging midcentury mortgage market and suburban expansion in the mid-20th century.

The University of Washington and Eastern Washington University Racial Restrictive Covenants Project identified more than 2,300 properties that were legally restricted in Kitsap County. None have been identified within Poulsbo city limits.

### Federal Mortgage Discrimination and Redlining

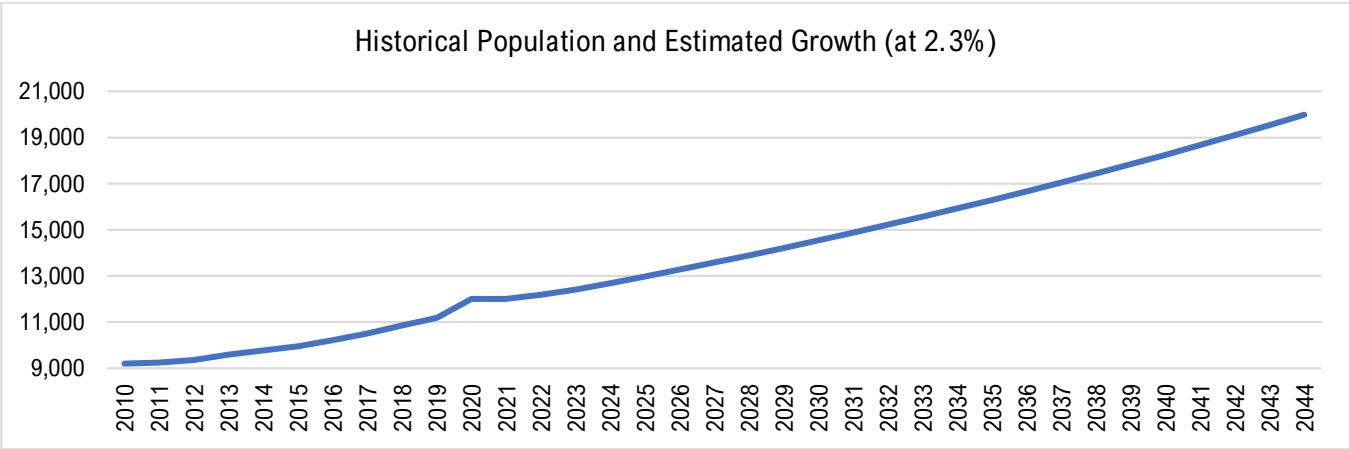
Throughout the 1930s and 1940s, the federal government created several agencies and programs to encourage homeownership for American citizens, but largely refused to offer these homeownership opportunities to BIPOC borrowers. For example, the short-lived Homeowners Loan Corporation (HOLC), created risk assessment maps (commonly known as "redlining maps") that deemed entire neighborhoods with sizeable Black, Asian or Jewish populations as ineligible for federal mortgage insurance or loans. The Federal Housing Administration (FHA), created in 1934, encouraged racial segregation in a variety of ways such as using racially restrictive covenants and denying mortgages in areas with racially mixed populations.

## Current Conditions

The historical context above describes the specific ways in which communities of color have been disadvantaged in accessing housing for decades. This section describes the current housing situation. The outcomes of discrimination and policy are complex and intertwined with the overall dynamics of the housing market and population growth. This section follows Department of Commerce guidance on collecting and presenting the best available data to identify and describe patterns in housing conditions, exclusion, displacement, and future displacement risk. Additional data can be found in the Housing Needs Assessment.

### Population and Race

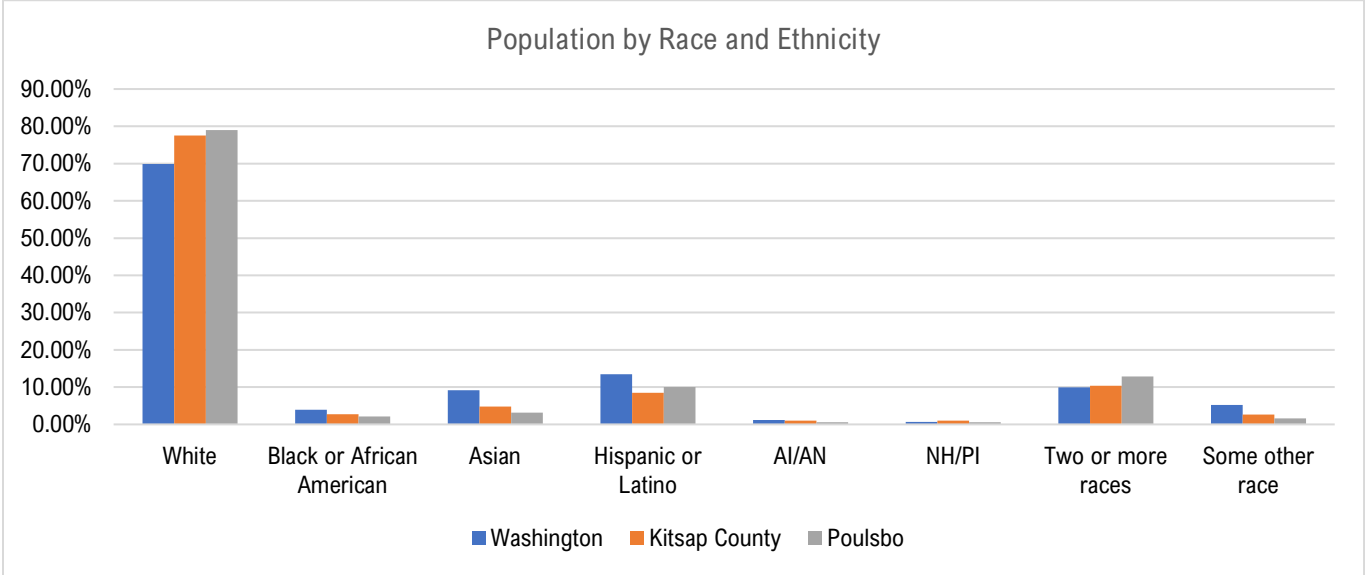
As of 2023, the estimated population of Poulsbo is 12,000. Since 2010, the City of Poulsbo has grown at an average annual rate of 2.3%.



Source: Washington State Office of Financial Management. 2023. "April 1 population estimates."

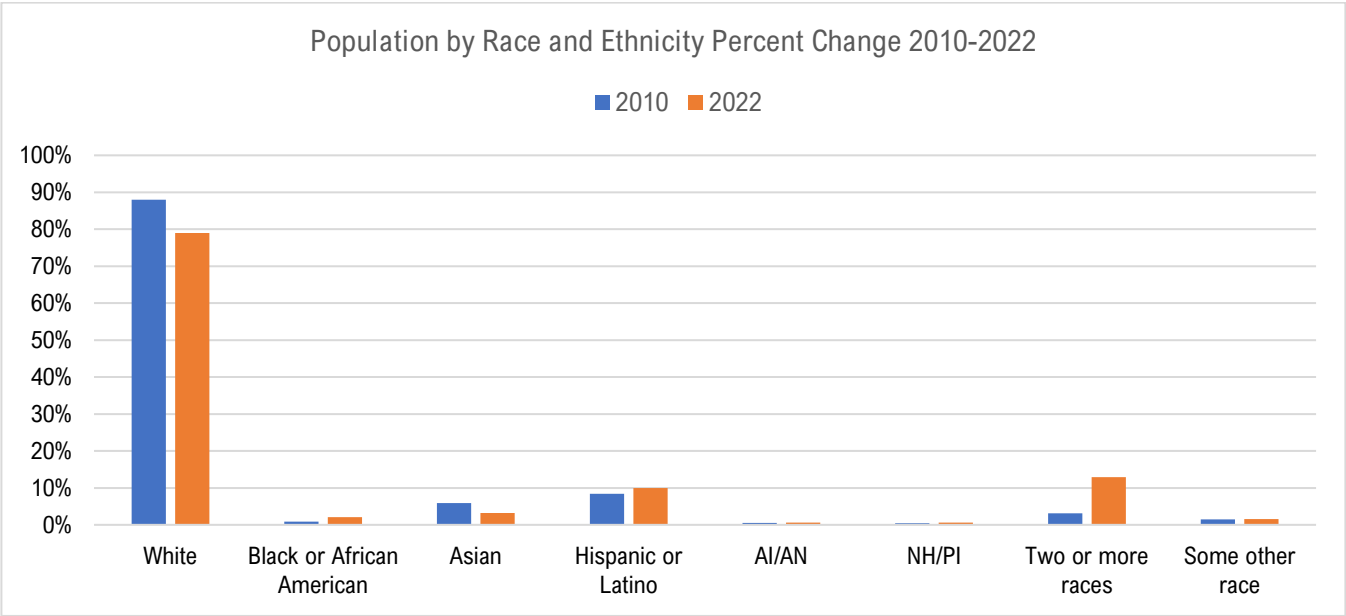
Race and ethnicity are two different concepts in the Census. Race refers to a person's self-identified category (White, Black, Asian, etc.), while ethnicity refers to whether a person is of Hispanic or Latino origin. Hispanic/Latino population can be of any racial group.

The Poulsbo population is less racially and ethnically diverse than the population of Kitsap County and Washington State, as shown below. In 2022, 79% of the Poulsbo population is white, 10% is Hispanic or Latino, 12.9% is two or more races, 3.2% is Asian alone, and 2.10% is Black or African American.



Source: U.S. Census Bureau. 2022. American Community Survey 5-year Estimates.

As shown below, Poulsbo has become more diverse since 2010. While still a small percentage of the overall population, the black or African American population has increased by 198%, while the Native Hawaiian/Pacific Islander population has increased by 109%. The city's Asian representation has decreased by 28% during that same time. Moreover, those of two or more races increased by 449%.

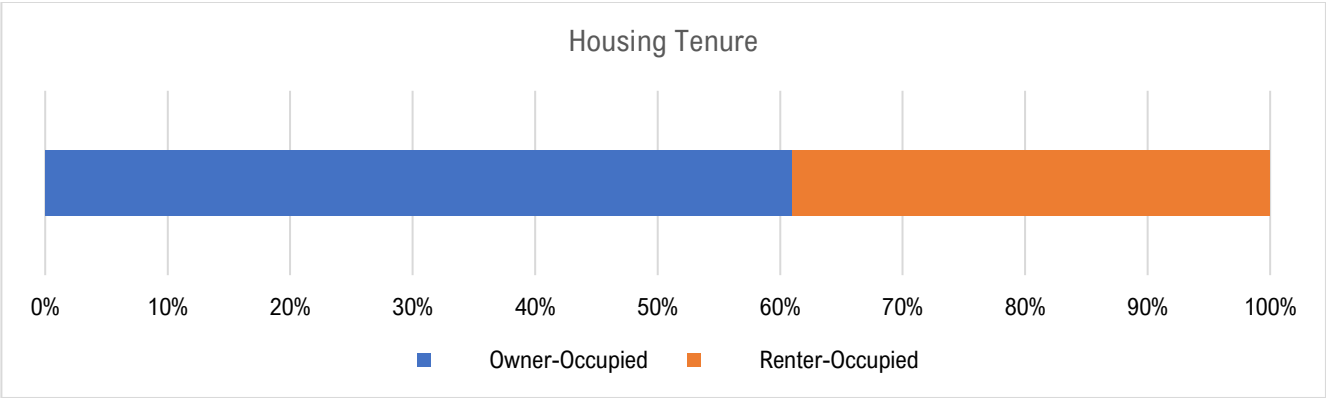


Source: U.S. Census Bureau. 2010 and 2022. American Community Survey 5-year Estimates.

### Households and Income

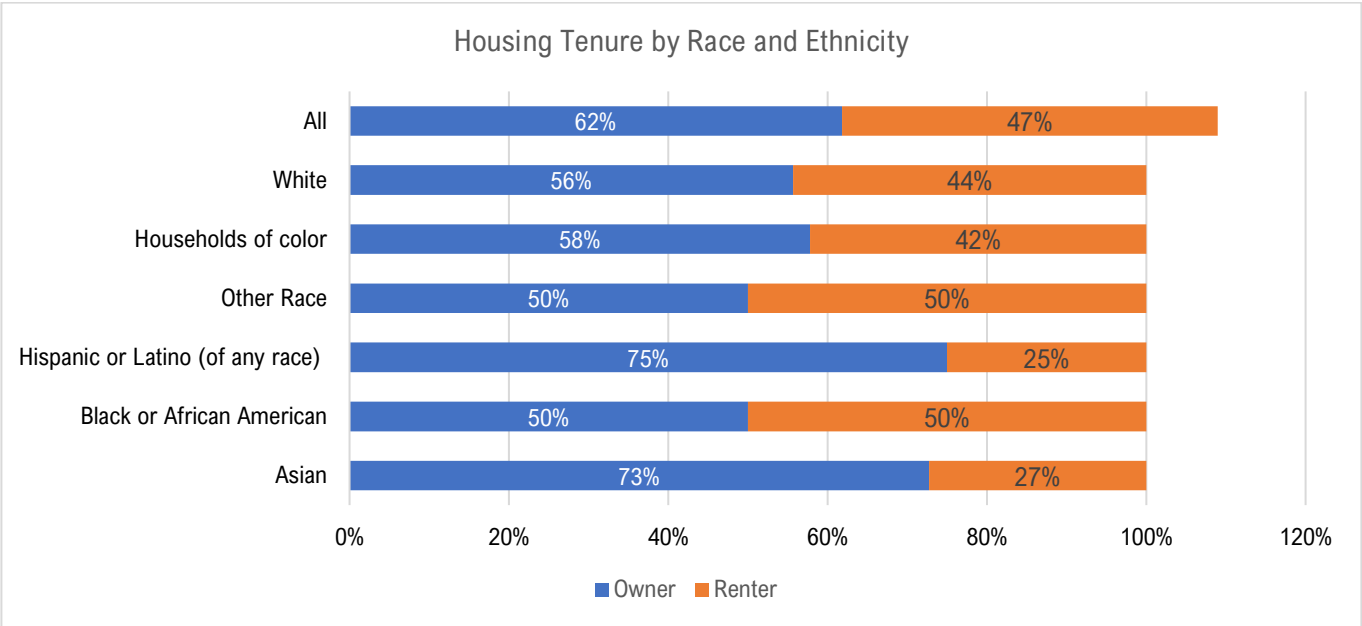
As of 2023, there were an estimated 5,345 housing units in the City of Poulsbo. This represents an increase of nearly 30% since 2010, when the estimated total was 4,115. As with population, Poulsbo and Port Orchard have seen significant increases in housing units since 2010.

As of 2022, an estimated 61% of households in the City of Poulsbo owned their home, while 39% were renting, as shown below. This represents a decline in the proportion of owner-occupied household units since 2010, when 68% of Poulsbo households were homeowners and 32% were renters.



Source: U.S. Census Bureau. 2022. American Community Survey 5-year Estimates.

As shown below, households of color (58%) are more likely to be homeowners than white (56%) households in Poulsbo. However, black or African American households are equally likely to be a homeowner and renter.



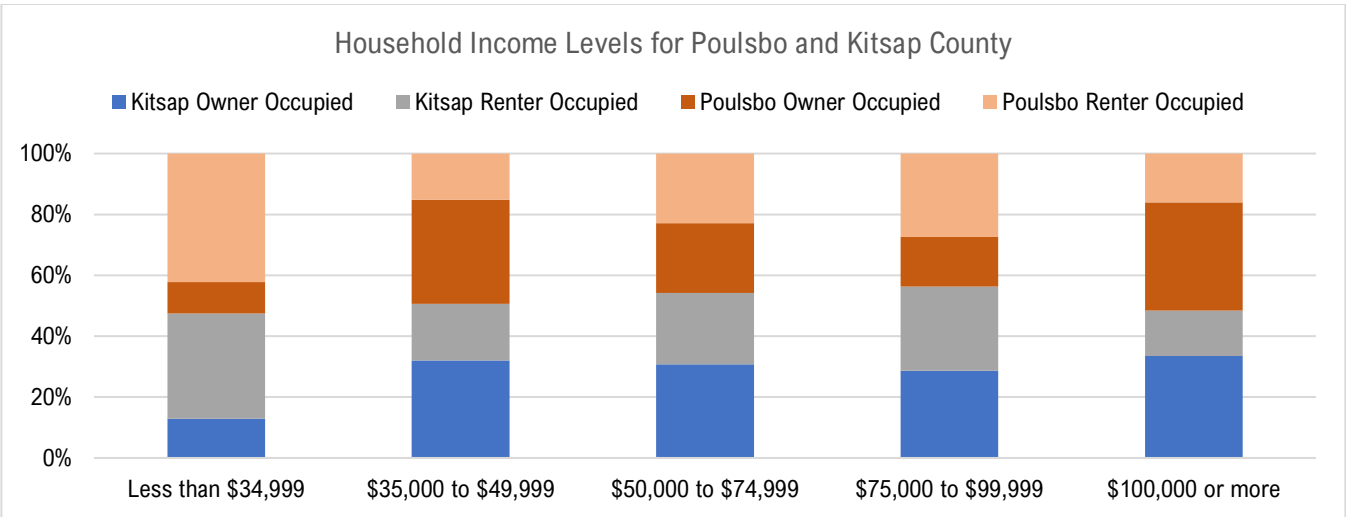
Source: US HUD, 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) (Table 9)

In 2022, the median household income (MHI) in the City of Poulsbo was \$121,425 for homeowners, \$49,732 for renters, and \$85,579 across all households. Poulsbo is just below the median household income for Kitsap County (\$86,668) and Washington State (\$85,936).

Median Household Income by Tenure, Poulsbo				
Housing Tenure	2010	2019	2022	Change 2010-2022
Renter	\$33,056	\$47,321	\$49,732	50%
Owner	\$72,366	\$89,333	\$121,425	68%

Source: U.S. Census Bureau. 2010, 2019, 2022. American Community Survey 5-year Estimates

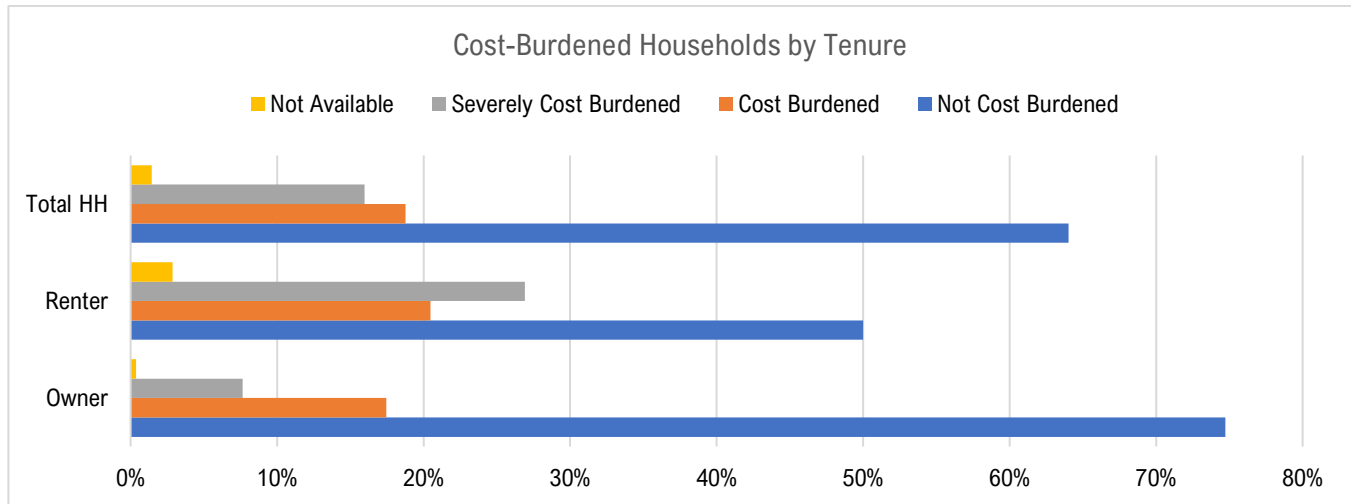
As shown below, households that own their homes are more likely to have higher incomes. Relative to Kitsap County, Poulsbo has a higher proportion of residents with annual incomes less than \$35,000 and a higher proportion of residents with annual incomes above \$100,000. In addition, Poulsbo has a lower proportion of residents making between \$35,000 to \$99,999 per year than the county. 32% of renters in Poulsbo make less than \$35,000 per year, while 58% of owners in Poulsbo make more than \$100,000 per year.



Source: U.S. Census Bureau. 2022. American Community Survey 5-year Estimates

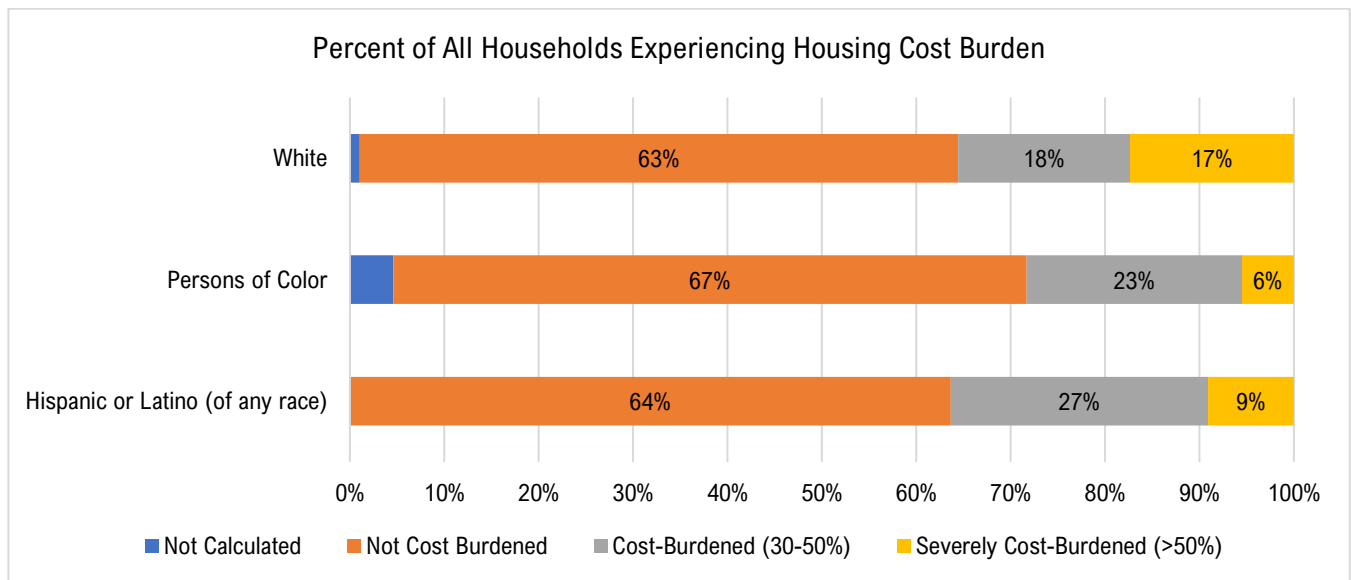
Cost-burdened households are those that spend more than 30% of their monthly income toward housing costs while severely cost-burdened households spend more than 50% or half of their incomes on housing costs. When households face high rates of cost burden, they often must make difficult choices in prioritizing purchases for other necessities such as food, healthcare, and childcare.

As shown below, about 35% of Poulsbo households are either cost burdened or severely cost-burdened. Overall, renters are substantially more likely to be cost-burdened or severely cost-burdened than owners. 47% of renters are either cost burdened or severely cost-burdened, while 27% of owners are either cost burdened or severely.



Source: HUD CHAS (based on ACS 5-year Estimates, 2016-2020)

As shown below, Hispanic or Latino (of any race) and persons of color households are more likely to not be cost-burdened, while white households in Poulsbo are more likely to be severely cost-burdened,



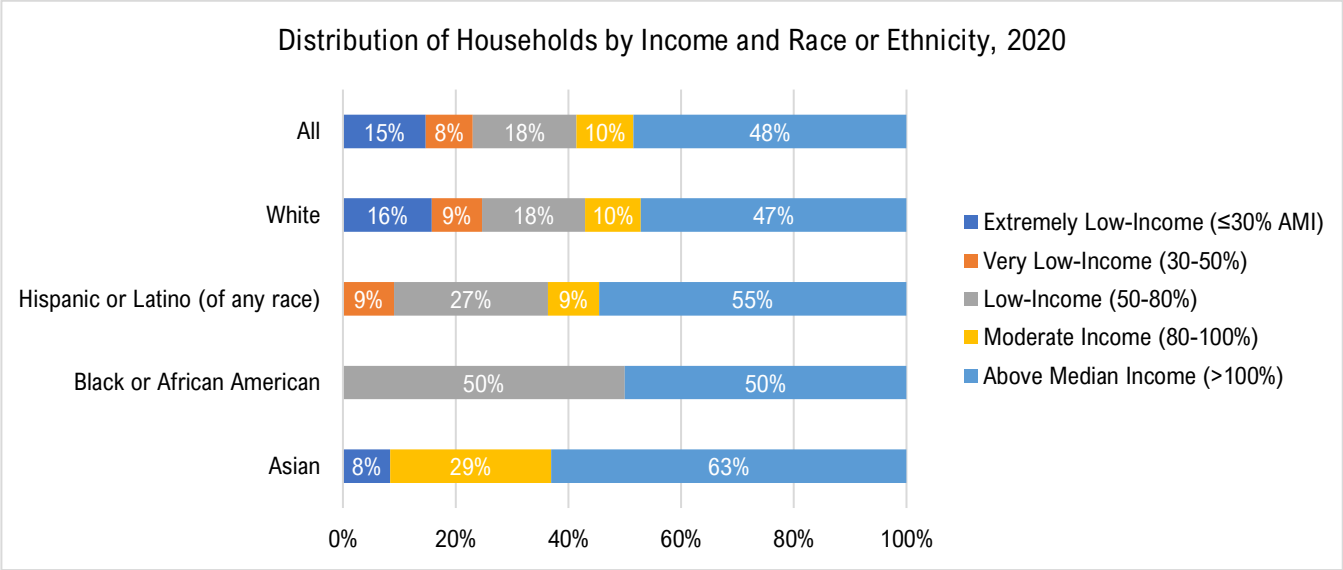
US HUD, 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) (Table 9)

Area Median Income (AMI) is a metric calculated by the Department of Housing and Urban Development (HUD) to determine the income eligibility requirements of federal housing programs. AMI is the midpoint of a region's income distribution, meaning that half of households in a region earn more than the median and half earn less than the median. A household's income is calculated by its gross income, which is the total income received before taxes and other payroll deductions.

Exhibit 16: HUD Chas Income Levels*	
Extremely Low Income	(≤30% AMI)
Very Low Income	(30-50% AMI)
Low Income	(50-80% AMI)
Moderate Income	(80-100% AMI)
Above Median Income	(>100% AMI)

\*A percentage of the AMI based on the specific geographic area where the household is located.

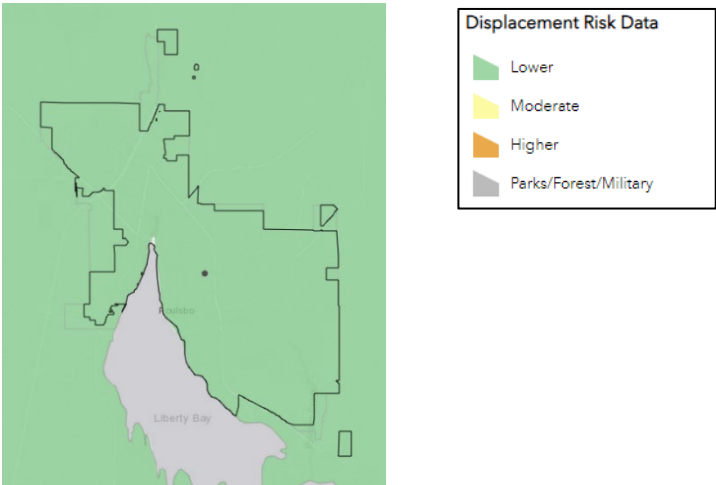
As shown in the graph below, white Poulsbo residents are more likely to be in the extremely low-income category.



Source: US HUD, 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) (Table 1)

### Displacement

The Puget Sound Regional Council has developed a strategy to determine the risk of displacement of census tracts. Each census tract in Poulsbo has received a place on the displacement index by analyzing factors in the following categories: socio-demographics, transportation qualities, neighborhood characteristics, housing, and civic engagement. Poulsbo is shown to have a low level of displacement risk (see below).



## Policy Evaluation

Policies that may appear race neutral can in effect result in exclusion in housing, displacement, and other disparate impacts. This may be due to underlying racial bias affecting the interpretation of policies, or effects that arise from the way the policy interacts with the housing marketplace, for example. This section describes the results of individual Comprehensive Plan policy review. Policies were reviewed according to an evaluative framework adapted from Department of Commerce Guidance on addressing racially disparate impacts in housing.

The selected rubric outlines an evaluation methodology for policies of the Comprehensive Plan. This tool is designed to identify policies and regulations that result in racially disparate impacts and displacement and exclusion in housing.

Key overarching questions include:

- Does this policy contribute to racially disparate impacts or exclusion in housing?
- Is the policy effective in accommodating more housing?
- Does the policy increase displacement risk?
- Does the policy provide protection to communities of interest from displacement?
- Does the policy language include vague terms that could be used to marginalize communities of color?

Each policy in the Housing Element is reviewed using the criteria shown below. Policies from other Elements that were found to be challenging under this rubric are presented in the following section. Each policy is reviewed for the language itself as well as the policy design and potential impacts of the policy, drawing from housing policy research, the Department of Commerce resources and guidance, and application of planning experience from multiple jurisdictions. Specific lenses through which each policy was reviewed include:

- Language clarity and potential for bias. Whether the policy includes use of coded or unclear language can lead to inequitable application.
- Deficit-based language. Whether the policy uses language can lead to an underappreciation of the needs and contributions of people in specific groups.
- Impact on housing stock. Whether the policy introduces barriers, such as excessive regulation, or incentives to overall housing stock and affordable housing to meet Poulsbo’s goals.
- Impact on housing mix and housing mix. Whether the policy prioritizes certain residential uses, and which uses are prioritized.
- Distribution of impact by geography, income, and community. Whether the policy creates benefits and burden or risks that will be unevenly distributed.
- Mitigation for anticipated impacts. Whether the policy includes consideration of impacts and plans to mitigate them, including displacement risk.

Policies are blunt and broad instruments and their impacts, intended and unintended, unfold over years. In this review the assessment of a policy as supportive, approaching, or challenging is a useful, but highly simplified way of summarizing complex issues. Continued monitoring of housing outcomes, community engagement, and continued policy refinement will be essential for Poulsbo to achieve its goals.

Existing Policy Evaluation Framework	
The policy supports achieving the GMA goal for housing. There is a need for the policy and/or it addresses identified racially disparate impacts, displacement, and exclusion in housing.	“S” Supportive
The policy can help achieve the GMA goal for housing but may be insufficient or does not specifically address racially disparate impacts, displacement, and exclusion in housing	“A” Approaching
The policy may challenge the jurisdiction’s ability to achieve the GMA goal for housing. The policy’s benefits and burdens should be reviewed to optimize the ability to meet the policy’s objectives while improving the equitable distribution of benefits and burdens imposed by the policy.	“C” Challenging
The policy does not affect the jurisdiction’s ability to achieve GMA goal housing and has no influence or impact on racially disparate impacts, displacement, or exclusion.	“NA” Not Applicable



The below table applies the evaluation framework across policies in the proposed Poulsbo Comprehensive Plan’s Housing Element. As described above, each policy was reviewed for the language itself; the content and design of the policy; likely impacts on housing stock, mix, and disparities; and whether mitigation efforts are needed. A score of “S” Supportive, “A” Approaching, “C” Challenging or “NA” Not Applicable summarizes the results of this assessment.

Existing Housing Element Policy Evaluation		
Policy	Evaluation	Notes
HS-1.1 Provide land for the city’s projected population through a variety of housing types, such as single family and multi-family attached and detached housing (both owner and renter occupied), mixed use, manufactured housing, group homes, government-assisted housing, and housing for low-income households.	A	Amended: Provide sufficiently zoned land for the city’s projected population and housing growth targets
HS-1.2 Safeguard that the local housing market provides housing opportunities for citizens regardless of race, color, religion, gender, national origin, handicap disability, economic status, familial status, or age.	A	Amended: Safeguard that the local housing market provides housing opportunities regardless of race, color, religion, gender, national origin, handicap disability, economic status, familial status, or age.
HS-1.3 Promote infill development in existing residential neighborhoods so vacant or underutilized land can be converted to residential uses. This includes developing land that may have been passed over for any number of reasons – low demand for land, low density site, leap-frog development or site constraints.	A	Implementation of this policy could help preserve existing affordable housing inventory and allow residents to stay in housing they can afford. It could also result in gentrification, loss of affordability and displacement for many households.
HS-1.4 Encourage the use of planned residential developments to promote flexibility in development standards and affordability in new housing construction.	S	
HS-2.1 Promote private efforts to preserve the existing quality housing stock by maintaining sound units, rehabilitating substandard units, and replacing severely deteriorated units.	A	Implementation of this policy could help preserve existing affordable housing inventory and allow residents to stay in housing they can afford. It could also result in gentrification, loss of affordability and displacement for many households.
HS-2.2 The City Public Works shall program regular infrastructure maintenance in existing residential neighborhoods to ensure its ability to adequately and appropriately support existing housing.	S	Amended: Program regular infrastructure maintenance in residential neighborhoods to ensure its ability to support existing housing.
HS-2.3 The City shall consider initiating a program that provides financial assistance through grants or low-interest loans to repair and rehabilitate aging or substandard housing.	A	Implementation of this policy could help preserve existing affordable housing inventory and allow residents to stay in housing they can afford. It could also result in gentrification, loss of affordability and displacement for many households.
HS-2.4 Encourage the maintenance, restoration, and rehabilitation of locally significant residences in which these residences are retained instead of redeveloped.	S	
HS-2.5 Encourage preservation of the unique scale and character of Poulsbo’s existing neighborhoods which provide housing for all income levels, while allowing for improvement with minimal displacement.	C	Amended: Encourage the preservation and enhancement of existing neighborhoods throughout the city.
HS-3.1 Promote socioeconomic integration by allowing for a variety of housing types and sizes together in new residential and redevelopment projects. In the RL zoning district, promote the use of the planned residential	C	Amended: Promote socioeconomic integration by allowing for a variety of housing types and sizes together in new residential and redevelopment projects. In the RL zoning

<p>development's provision for attached housing units clustered with the traditional single-family detached units.</p>		<p>district, continue the use of the planned residential developments to promote a variety of housing types, sizes, and site planning techniques that can achieve the maximum housing potential of the site while being designed in consideration of surrounding properties and the natural environment.</p>
<p><b>HS-3.2</b> Continue to permit accessory dwelling units in the RL zone and provide development standards in the City's Zoning Ordinance that also promote ease of permitting. Accessory dwelling units shall be achieved by adding a second unit by:</p> <ul style="list-style-type: none"> <li>• A second separate dwelling unit built on the same lot;</li> <li>• A second dwelling unit added to the original residence on the lot;</li> <li>• A second dwelling unit by converting an existing accessory structure on the lot; or</li> <li>• A second dwelling unit created by converting existing space, such as an attached garage, in the original residence.</li> <li>• Accessory units do not include recreation vehicles of any kind.</li> </ul>	<p>S</p>	<p>Proposed to be deleted. Replace with: Encourage development of accessory dwelling units (ADUs) through streamlined permitting, education and resources, and regular monitoring of the ADU regulations.</p>
<p><b>HS-3.3</b> Promote home ownership by encouraging alternatives to conventional detached single-family housing, such as condominiums, attached single family units, and townhouses.</p>	<p>C</p>	<p>Proposed to be deleted. Replaced with: Expand housing capacity for moderate density housing to bridge the gap between single-family and more intensive multifamily development and provide opportunities for more affordable ownership and rental housing that allows more people to live in neighborhoods across the city.</p>
<p><b>HS-3.4</b> Encourage preservation of land currently accommodating manufactured home parks and continue to permit manufactured homes in all residential zones.</p>	<p>A</p>	<p>Proposed to be deleted and replaced with: Recognize the role of mobile and manufactured housing as an important component of Poulsbo's housing stock by creating a more stable planning and zoning environment for their continuation and by providing flexible and effective development regulations that will allow the upgrading and modernizing of older manufactured/mobile home parks.</p>
<p><b>HS-3.5</b> Encourage new multi-family housing in a variety of types and sizes in areas designated for such use in the Land Use Chapter and Map.</p>	<p>S</p>	
<p><b>HS-3.6</b> Encourage additional housing units through the provisions of mixed-use development in commercially zoned areas.</p>	<p>S</p>	<p>Amended: Encourage additional housing units through the provisions of mixed-use development in commercially zoned areas and consider allowing, in certain circumstances, residential uses to develop independent of or through flexible space provisions.</p>
<p><b>HS-4.1</b> Disperse housing for low- and moderate-income households through Poulsbo and its Urban Growth Area and discourage the disproportionate concentration of such housing in any one geographical area of the city.</p>	<p>S</p>	
<p><b>HS-4.2</b> Continue to support the regionally coordinated provision of low-income housing through the City's participation with the Kitsap Regional Coordinating Council and Housing Kitsap. The City shall support and encourage the Housing Kitsap's pursuit of funding for low- and</p>	<p>S</p>	

moderate- income housing through the Community Development Block Grant program, state and federal programs, and other available funding opportunities.		
HS-4.3 Support and encourage Habitat for Humanity and private developers who seek to provide below-market housing units.	S	Deleted and replace with: Promote and encourage private developers and nonprofit organizations that seek to create increased housing and home ownership opportunities for low- and moderate- income households, such as Housing Kitsap’s Self-Help Housing program, Habitat for Humanity, shared or limited-equity housing, lease-purchase options, cohousing, and land trusts and cooperatives
HS-4.3 Provide density bonus opportunities in the City’s Zoning Ordinance for development proposals that provide low- to moderate-income housing units. Provide criteria and process for ensuring that those units remain affordable over time.	S	Amended: Provide density bonus opportunities and other incentives for development proposals that provide low- to moderate-income housing units. Provide criteria and process for ensuring that those units remain affordable over time.
HS-4.4 Continue to support and encourage the Housing Kitsap’s Self-Help Housing program, in which people gain home equity in exchange for work performed in renovation or construction.	S	Policy deleted and combined with HS-4.3 above
HS-4.5 Promote partnerships between public and private nonprofit organizations to create increased housing and home ownership opportunities for low- and moderate-income households.	S	Policy deleted and combined with HS-4.3 above
HS-4.6 Support other ownership approaches that may apply to low-income housing, such as shared or limited-equity housing, lease-purchase options, cohousing, and land trusts and cooperatives.	S	Policy deleted and combined with HS-4.3 above
HS-4.7 The City shall support agency and nonprofit organizations in the creation of housing opportunities to accommodate the homeless, elderly, physically or mentally challenged, and other segments of the population who have special needs.	S	
HS-4.8 Research other emerging housing options or development incentives that are appropriate to be included in the City’s zoning ordinance that will provide an increase of affordable housing units into the City’s housing stock.	S	
HS-4.9 Encourage as affordable housing options, rooms for rent and boarding houses - which benefit those on a fixed income with those of low income - and thereby strengthening their social safety net and increased sense of community.	S	

New Supportive Policies Proposed for Housing Element
New HS-1.3: Plan for a range of housing choices near job centers that are attainable for workers at all income levels.
New HS-1.8: Consider innovative techniques, development standards, and incentives to accommodate higher-density housing along the SR305 Corridor, where transit, employment and other services are present.
New HS-1.9: Review and streamline development standards and regulations to improve their public benefit, provide flexibility, and minimize additional costs to housing.
New HS-1.10: Continue to implement the recommendations of the 2019 Housing Action Plan, as amended and as resources allow.

New HS-1.11: Expand housing capacity for moderate density housing to bridge the gap between single-family and more intensive multifamily development and provide opportunities for more affordable ownership and rental housing that allows more people to live in neighborhoods across the city
New HS-1.13: Encourage and support accessible design and housing strategies that provide seniors the opportunity to remain in their own neighborhood as their housing needs change
New HS-1.15: Encourage and support the development of emergency, transitional and permanent supportive housing with appropriate on-site services for persons with special needs.
New HS-3.1: Identify and implement strategies to meet affordable housing targets identified in the Kitsap County Countywide Planning Policies.
New HS-3.2: Identify potential physical, economic, and cultural displacement of low-income households and marginalized populations that may result from planning, public investments, private redevelopment, and market pressure. Use a range of strategies to mitigate displacement impacts to the extent feasible.
New HS-3.9: Continue to support the Department of Housing, Health and Human Services and its efforts to acquire grants and facilitate projects that provide affordable and transitional housing and financial support to our most vulnerable populations.

## Regulation Evaluation

RCW 36.70A.070(2)(f) requires jurisdictions to implement regulations that address and begin to undo racially disparate impacts, displacement, and exclusion in housing. To support jurisdictions in reviewing and updating regulations and programs, this section compiles a list of incentive, strategy, action, and regulation options that can begin to undo racially disparate impacts, displacement and exclusion in housing at the local or regional level.

This 2021 Poulsbo Housing Action Plan identifies strategies that can help to improve housing supply and affordability and guide new growth that benefits both new and existing residents. Collectively, these strategies are intended to achieve four key objectives:

- Promote new market-rate and affordable housing construction that expands housing choices.
- Encourage homeownership opportunities and support equitable housing outcomes.
- Plan for forecasted growth and ensure the built environment promotes community and sustains the quality of life for Poulsbo’s existing and future residents.
- Preserve existing affordable housing stock to reduce displacement pressures.
- Partner with housing educators, providers, non-profit organizations and faith-based to find equitable housing solutions.

Staff will utilize the Department of Commerce example evaluation approach (Step 5, Guidance to Address Racially Disparate Impacts) as a model for updating our development regulations to align with our goals and policies to ensure that they equitably serve all community members. Staff will consider the regulations intended and unintended impacts and the distribution of the benefits and burdens.