



SECTION 2 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.

2.1 Rubric

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 that can lead to inequitable application.
- **Deficit-based language.** Whether the policy uses language that 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 Bellevue'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 Bellevue to achieve its goals.

TABLE 2-1 Existing Policy Evaluation Framework

Criteria	Evaluation
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

2.2 Findings

The below table applies the evaluation framework across policies in the existing Bellevue 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.

TABLE 2-2 Housing Element Policy Evaluation

Policy	Evaluation	Rationale
HO-1 Encourage investment in and revitalization of single family and multifamily neighborhoods where private investment patterns are not accomplishing this objective.	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. Additional clarification and guidance should be provided to identify how this policy will or will not result in equitable outcomes for those who have historically been underserved in the Bellevue housing market. Consider adding community engagement to define vitality and therefore investment objectives.
HO-2 Promote quality, community-friendly single family, multifamily and mixed use development, through features such as enhanced open space and pedestrian connectivity.	C	Policy HO-2 uses broad and undefined language, including "...development quality..." and "...community-friendly." Two potential features that could be used to implement the policy are identified. This is not an inclusive list and criteria for additional features that would implement this policy are not provided. As currently written, this policy could be used to displace and exclude communities who cannot afford or are not served by future actions used to implement this policy. Clarification of policy intent, consideration of diverse perspectives and needs, and demonstration of how underserved communities will be served and not be excluded are recommended. Consider adding or referring to anti-displacement measures and tools.

Policy	Evaluation	Rationale
HO-3 Maintain the character of established single family neighborhoods, through adoption and enforcement of appropriate regulations.	C	Policy HO-3 language, including such phrases as "...character of established single-family neighborhoods..." and "...appropriate regulations," could result in a high potential for disparate impacts to underserved communities. Subjective and undefined terms should be clarified so that an equitable balance of policy benefits and burdens is clearly understood. Clarification of the intent and implications of this policy is recommended.
HO-4 Monitor and appropriately regulate room rentals in single family areas.	C	Policy HO-4 implies that room rentals have a negative impact in single family areas and that impacts should be "...appropriately regulated." Because terms are not defined, the potential for disparate impacts to underserved communities is high. Implicit assumptions and undefined terms should be made explicit so that an equitable balance of policy benefits and burdens is clearly demonstrated. Clarification of the intent and implications of this policy is recommended.
HO-5 Anticipate the future maintenance and restoration needs of older neighborhoods through a periodic survey of housing conditions. Report results of such surveys to residents.	S	
HO-6 Provide financial assistance to low-income residents for maintaining or repairing the health and safety features of their homes through the Housing Repair Program, or similar program.	A	While not specifically an equity issue, the use of the term low-income resident or person is now recognized as deficit-based language that focuses on what people lack. Instead use specific, person-first language such as "people with low or lower incomes." In addition, clarify whether the intended beneficiaries are both homeowners and renters? If yes, "residents" works. Otherwise, specific language needs to be added.
HO-7 Encourage the development of affordable housing through incentives and other tools consistent with state-enabling legislation.	S	

Policy	Evaluation	Rationale
HO-8 Employ effective strategies that support the Fair Housing Act and affirmatively further fair housing.	S	
HO-9 Encourage development of appropriate amenities for families with children throughout the city through investments, development regulations and incentives.	S	
HO-10 Work with colleges, including Bellevue College, and private developers to support housing for students on-campus and in adjacent transit served mixed use/ commercial areas.	S	
HO-11 Encourage housing opportunities in mixed residential/ commercial settings throughout the city.	S	
HO-12 Provide incentives to encourage residential development for a range of household types and income levels in multifamily and mixed use commercial zones.	S	
HO-13 Ensure that mixed-use development complements and enhances the character of the surrounding residential and commercial areas.	A	Policy HO-13 seeks to ensure that mixed use development "...complements and enhances..." surrounding residential and commercial areas. This policy may present a barrier to achieving Bellevue's housing goals, especially for affordable units. Subjective terms in this policy should be defined. Consider how this policy will or will not result in equitable outcomes for those who have historically been underserved in the Bellevue housing market.
HO-14 Provide opportunity to allow a demonstration project through methods such as an interim ordinance enabling a demonstration project(s) that would serve as a model for housing choices currently not being built in Bellevue.	S	
HO-15 Allow attached accessory dwelling units in single family districts subject to specific development, design, location, and owner occupancy standards. Allow detached accessory dwelling units where expressly allowed by neighborhood subarea plans.	C	Policy HO-15 supports accessory dwelling units (ADUs) in single family districts subject to specific development regulations. Substantive and procedural requirements that reduce development feasibility and/or increase costs may make it difficult or impossible to develop ADUs. In particular, the requirement for

Policy	Evaluation	Rationale
		specific subarea plan policy approval may effectively preclude detached ADUs in many areas of the city. This policy and implementing measures should be reviewed to ensure an equitable distribution of benefits and burdens imposed by the policy and supporting regulations.
HO-16 Provide opportunities and incentives through the Planned Unit Development (PUD) process for a variety of housing types and site planning techniques that can achieve the maximum housing potential of the site.	S	
HO-17 Evaluate the housing cost and supply implications of proposed regulations and procedures.	S	Suggest that housing cost and supply evaluations be disaggregated to show disparate racial impacts.
HO-18 Promote working partnerships with housing developers to help create a variety of housing types in the community.	S	
HO-19 Support housing options, programs, and services that allow seniors to stay in their homes or neighborhood. Promote awareness of Universal Design improvements that increase housing accessibility.	A	Policies HO-19 and HO 20 address housing services for older adults. While not specifically an equity issue, the use of such terms as “senior, elderly, or aged” evoke negative stereotypes and can lead to othering toward and bias against for older adults. Instead of those terms, consider more neutral phrases, such as “older adult, “older person,” or “persons over 65.”
HO-20 Encourage a range of housing types for seniors affordable at a variety of income levels.		Policy HO-20 encourages a range of housing types for older adults at a variety of income levels. To reduce the potential for disparate impacts, displacement and exclusion in housing, the balance of needs for those at all income levels and of those who have historically been underserved in the Bellevue housing market should be considered. Recognize that use of universal design techniques to increase housing accessibility is not just an issue for older adults.
HO-21 Address the entire spectrum of housing needs, including the need for housing affordable to very low, low, and moderate	S	Consider deleting "address the entire spectrum of housing needs," to focus the policy more clearly on the needs of

Policy	Evaluation	Rationale
income households, through the city's affordable housing programs.		very low, low and moderate income households.
HO-22 Work cooperatively with King County, A Regional Coalition for Housing (ARCH), and other Eastside jurisdictions to assess the need for, and to create, affordable housing.	S	
HO-23 Encourage the development of affordable housing through incentives and other tools consistent with state-enabling legislation.	S	
HO-24 Develop and implement an effective strategy to ensure affordable housing opportunities are available in Downtown and throughout the city at a range of affordability levels. Monitor quantity, types, and affordability of housing achieved for potential unintended consequences and to determine if the need is being met	A	Policy HO-24 supports affordable housing opportunities throughout the city at a range of affordability levels. The policy also discusses monitoring for "...potential unintended consequences." New housing is not typically monitored for potential unintended consequences, and it is not clear why affordable housing would be treated differently. Clarification or removal of this part of the policy is recommended.
HO-25 Provide funding to support housing need, especially for low and very low income households. Assess housing fund guidelines on a regular basis to ensure they are consistent with changing community needs and priorities.	S	
HO-26 Provide incentives and work in partnership with not-for-profit and for-profit developers and agencies to build permanent low- and moderate-income housing.	S	
HO-27 Encourage preservation, maintenance and improvements to existing affordable housing.	S	
HO-28 Explore all available federal, state, and local programs and private options for financing affordable housing.	S	
HO-29 Explore financial incentives to encourage affordable housing, such as partial exemptions from city permit fees, the state property tax exemption program and other state enabled programs.	S	
HO-30 Ensure that all affordable housing created in the city with public funds or by	S	

Policy	Evaluation	Rationale
regulation remains affordable for the longest possible term.		
HO-31 Participate in relocation assistance to low-income households whose housing may be displaced by condemnation or city-initiated code enforcement.	S	
HO-32 Evaluate surplus city land for use for affordable housing.	S	
HO-33 Implement Affordable Housing Strategy C-1 by providing bonuses and incentives to increase permanently affordable housing on any qualifying property owned by faith-based or non-profit housing entities, or on surplus property owned by public entities.	S	
HO-34 Implement the bonuses and incentives for qualifying properties to respond to the different conditions of multifamily and single family land use districts that are outside of Downtown, BelRed, and Eastgate TOD. <i>Discussion: Adopting permanently affordable housing bonuses and incentives that respond to the different conditions for multifamily and for single family districts for the purpose of creating flexibility in development standards is needed to achieve bonus affordable housing units on qualifying properties. Amending these standards for use in by-right development processes will address the look and feel of housing structures, variations in the type of housing, and dimensional standards.</i>	A	Policy HO-34 language is unclear and has not been evaluated for equity impacts. While the goal appears to be laudable (create more affordable housing through density bonuses) it appears to be written for a specific case, not for the broad guidance needed in a comprehensive plan.
HO-35 Adopt an interim ordinance enabling a demonstration project including affordable housing and is consistent with Policy HO-14, on qualifying non-profit housing entity-owned property and when located in a multifamily land use district and is on an arterial. The interim ordinance shall address standards and requirements for site proximity to transit, residential development capacity, and other land use dimensional incentives for the additional development of permanently affordable housing	S	
HO-36 Recognize that adult family homes and other state regulated special needs housing provide stable, neighborhood housing options for elderly and disabled residents. Work to		While not specifically an equity issue, the use of such terms as “senior, elderly, or aged” an “disabled” evoke negative stereotypes and can lead to othering

Policy	Evaluation	Rationale
address needs for services, emergency response and other potential accommodation.		toward and bias. Consider more neutral and person first language, such as “older adults” “persons over 65” and “persons living with a disability.”
HO-37 Provide reasonable accommodation for housing for people with special needs in all areas, and avoid concentrations of such housing, while protecting residential neighborhoods from adverse impacts.	C	Consider deleting “...reasonable accommodation...” from this policy to simplify and more accurately describe the city’s role in providing for housing for people with special needs. Clarify assumptions regarding avoiding concentrations and adverse impacts to residential neighborhoods. Implicit assumptions and undefined terms should be made explicit so that an equitable balance of policy benefits and burdens is clearly demonstrated. Clarification of the intent and implications of this policy is recommended.
HO-38 Support regional efforts to prevent homelessness, and make homelessness rare, brief, and one time when it occurs. Provide a range of affordable housing options and support efforts to move homeless persons and families to long-term financial independence.	S	
HO-39 Collaborate with other jurisdictions and social service organizations to assure availability of emergency shelters and day centers that address homelessness.	S	
HO-40 Support and plan for assisted housing using federal or state aid and private resources.	S	

SOURCE: Seva Workshop, 2023.

The table below applies the evaluation framework across policies in the existing Bellevue Comprehensive Plan’s remaining Elements. Only policies with an A or C evaluation are included below. The number of policies included per element are:

- Citizen Engagement Element (3)
- Land Use Element (8)
- Neighborhoods Element (2)
- Capital Facilities Element (1)
- Transportation Element (3)
- Urban Design and the Arts (10)

TABLE 2-3 Non-Housing Element Policy Evaluation

Policy	Evaluation	Rationale
CE-2 Consider the interests of the entire community and the goals and policies of this Plan before making land use decisions. Proponents of change in land use should demonstrate that the proposed change responds to the interests and changing needs of the entire city, balanced with the interests of the neighborhoods most directly impacted by the project.	C	Without explicit direction otherwise, balancing the “interests of the entire city with the interests of the neighborhoods most directly impacted by the project” can lead to majority-rule decision-making, which often serves to dilute or silence the voices of those most impacted by the decision who tend to be in the minority. Consider emphasizing the role of those most directly impacted by the project, especially if they overlap with historically underserved populations.
CE-3 Ensure that the process which identifies new commercial areas or expands existing areas considers the impacts of potential development on affected residential neighborhoods and results in decisions that are consistent with other policies in the Comprehensive Plan.	A	Consider strengthening policy language to ensure that the housing impacts of commercial expansion are not only considered in the process but addressed with specific anti-displacement tools.
CE-4 Balance the interests of the commercial and residential communities when considering modifications to zoning or development regulations.	C	Without explicit direction otherwise, balancing the interests of commercial and residential communities will likely lead to replication of existing power dynamics. Consider adding and emphasizing interests of underserved populations also.
LU-1 Promote a clear strategy for focusing the city's growth and development as follows: <ol style="list-style-type: none"> 1. Direct most of the city's growth to the Downtown regional growth center and to other areas designated for compact, mixed use development served by a full range of transportation options. 2. Enhance the health and vitality of existing single family and multifamily residential neighborhoods. 3. Continue to provide for commercial uses and development that serve community needs." 	A	Consider incorporating equity consideration as part of the strategy.
LU-13 Support neighborhood efforts to maintain and enhance their character and appearance.	C	“Character and appearance...” are subjective terms that could be used to exclude groups and housing types from

Policy	Evaluation	Rationale
		existing neighborhoods. Clarify the intent and implications of this policy.
LU-14 Protect residential areas from the impacts of non-residential uses of a scale not appropriate to the neighborhood.	C	“Appropriate” is a subjective term that could be used to exclude groups and housing types from existing neighborhoods. Consider rephrasing the policy to remove the assumption that scale has only negative impacts from which residents require “protection.”
LU-18 Encourage new neighborhood retail and personal services in locations that are compatible with the surrounding neighborhood, allow for ease of pedestrian access, and enhance neighborhood character and identity.	C	“Character and identity...” and “compatibility” are subjective terms that could be used to exclude groups and housing types from existing neighborhoods. Clarify the intent and implications of this policy and consider inclusive community engagement to define desired character and identity.
LU-19 Support mixed residential/commercial development in all Neighborhood Business and Community Business land use districts in a manner that is compatible with nearby uses.	C	“Compatibility” in this policy should be defined. Development should also assess the distribution of benefits and burdens for Bellevue residents, especially those who have historically been underserved in the Bellevue housing market.
LU-25 Assess the compatibility of commercial uses and other more intense uses when located in mixed use and predominantly residential areas.	C	“Compatibility” in this policy should be defined. Consider the need to assess the distribution of benefits and burdens for Bellevue residents, especially those who have historically been underserved in the Bellevue housing market.
LU-27 Encourage the master planning of multi-building and multi-parcel developments and large institutions to emphasize aesthetics and community compatibility. Include circulation, landscaping, open space, storm drainage, utilities, and building location and design in the master plan.	C	Incorporate language that recognizes that, rather than emphasizing aesthetics and community compatibility, these considerations should be evaluated in balance with other city priorities, such as the provision of housing and services to under-served groups. “
LU-29 Help communities to maintain their local, distinctive neighborhood character, while recognizing that some neighborhoods may evolve.	C	“Local, distinctive neighborhood character...” is a subjective term that could be used to exclude groups and housing types from existing neighborhoods. This language may also restrict Bellevue’s ability to achieving housing goals. Policy language could be strengthened to recognize that all neighborhoods evolve.

Policy	Evaluation	Rationale
		Clarify the intent and implications of this policy and consider inclusive community engagement to define desired character.
N-9 Preserve and develop distinctive neighborhood character within Bellevue's diverse neighborhoods.	C	"Distinctive neighborhood character..." is a subjective term that could be used to exclude groups and housing types from existing neighborhoods. This language may also restrict Bellevue's ability to achieving housing goals. If "diverse neighborhoods" is intended to refer to a subset of all neighborhoods, specify with geographic terms or metrics of diversity.
N-11 Enable neighborhood-tailored solutions to localized issues while ensuring that they meet citywide and regional planning objectives.	A	Consider specifying how localized issues are identified and measures to ensure the process is inclusive.
CF-20 Work to site or expand essential public facilities in ways that equitably balance social, environmental, and economic impacts to achieve citywide and regional planning objectives.	A	Consider adding "historical impacts" to the list to create opportunity to address past inequities.
TR-7 Ensure that land use changes near high capacity transit stations are consistent with the Comprehensive Plan, recognizing that: <ol style="list-style-type: none"> 1. Transit may support more intense development around some stations. 2. Transit supportive design and orientation may be implemented without changes to land use intensity; and 3. Land use plan map changes would be precluded in existing single-family designations and environmentally sensitive areas." 	A	In TR-7(3), consider policy direction that could allow for changes to single family designations where housing and services to historically under-served groups would be provided.
TR-119 Work with state agencies to incorporate enhancements to minimize neighborhood impacts when improving state highways.	A	For policies that reference neighborhood impacts integrate data analysis to identify and mitigate disparate impacts across groups of residents and business owners.
TR-135 Develop the transportation system in Bellevue to minimize environmental and neighborhood impacts, while addressing the city's long-term transportation and land use objectives.	A	For policies that reference neighborhood impacts integrate data analysis to identify and mitigate disparate impacts across groups of residents and business owners.

Policy	Evaluation	Rationale
UD-7 Support neighborhood efforts to maintain and enhance their character and appearance.	C	"Neighborhood character and appearance..." can be defined in exclusionary ways.
UD-11 Develop Downtown and other mixed-use areas to be functional, attractive and harmonious with adjacent neighborhoods by considering through-traffic, view, building scale, and land use impacts.	C	"Functional, attractive, and harmonious..." can be defined in exclusionary ways.
UD-43 Permit high intensity development subject to design criteria that assures a livable urban environment.	A	Define the term "high-intensity." Include or refer to criteria for "livability" and "design". Specify if this policy applies to specific geographic zones or if it is citywide.
UD-44 Incorporate the character of the surrounding community into the architecture, landscaping and site design of commercial and mixed use centers.	C	"Community character..." can be defined in exclusionary ways.
UD-45 Ensure that perimeter areas of more intense developments use site and building designs that are compatible with and connect to surrounding development where appropriate.	A	Define the term "more intense" or refer to specific criteria.
UD-47 Mitigate potential impacts to surrounding neighborhoods using landscaping, greenspace and other urban design elements.	A	Specify types of impacts to be mitigated.
UD-55 Exemplify the Pacific Northwest character through the use of appropriate plants in new landscaping.	C	Contains subjective terms "Pacific Northwest character" and "appropriate plants." If the intent is to "use native plantings in new landscaping", simplify to say as much.
UD-75 Minimize the removal of existing vegetation when improving streets to preserve the natural character of Bellevue.	A	Consider striking the subjective last clause "to preserve the natural character of Bellevue."
UD-76 Work closely and cooperatively with regional transit providers in the planning and design of transit facilities to ensure that the design of the facilities reflects the general character of Bellevue and the surrounding neighborhoods.	C	"general character of Bellevue" is a subjective term that can be interpreted in exclusionary ways.

SOURCE: Bellevue Comprehensive Plan, 2015; Seva Workshop, 2023.

2.3 Conclusion

This Comprehensive Plan is a significant opportunity to revise policies and improve equity in housing and other outcomes in the City of Bellevue. The current housing situation is one of great disparity. Some residents are more likely to own houses, live in single-family units, attend high quality schools and parks, and live relatively near to their place of work where they earn a high income for the area. These residents are unlikely to count housing costs and the potential of being displaced from their home and community among their daily stressors. Other residents have a quite different experience. They are more likely to be paying more than one-third (or over one half) of their income for housing, more likely to be exposed to and vulnerable to environmental health threats, living in more crowded or poorer quality units, and unable to find homeownership opportunities. In Bellevue, race and ethnicity are predictors of which group a resident is likely to be in. Asian and white residents in the former. Black and Hispanic/Latino residents in the latter. Income and age are also related to the likelihood of finding and maintaining housing in Bellevue.

As the unifying long-term policy document for City planning, the Comprehensive Plan guides investments and decisions that can mitigate and rectify these disparities. Several themes describe the equity revisions in the updated plan. First, the revisions provide more specific language that can be enforced objectively. This was the most common type of revision. Subjective terms such as “community character” or “appropriate” appeared in numerous policies, and could be interpreted in exclusionary ways. In many cases these terms were removed from the policy altogether. Other language edits included to further define or clarify subjective terms such as “high-impact.” In this case, better definition of the specific impacts that are the intended subject of the policy and a description of the threshold that is considered “high” will lead to more equitable application of the policy. We also identified some opportunities to rephrase deficit-based language that can have a more subtle effect of creating or reinforcing biases against a community.

In several instances, the revisions encourage community engagement and data analysis to make decisions based on current and nuanced understanding of needs and desires. Certain concepts like “quality of life” evolve and differ between community groups. Opportunities for affected communities to define quality of life, neighborhoods, and housing can provide important direction for City planning. Also in this vein, some revisions were needed to prioritize and seek out the input of groups most affected by the policy, rather than relying on city-wide data or on the voices of the most pro-active constituents by default.

Finally, the updates also reframe the distribution of public resources to consider historical context and greatest needs as a metric for investment. In some cases, historical context is explicitly added to the policy as criteria for decision-making. In other cases, the policy is strengthened by added consideration of potential disparate impacts and mitigating them, such as integrating anti-displacement measures.

Decades of racist and exclusionary policies are difficult to undo, however, and City actions will occur in the context of a dynamic and changing housing market. As described earlier in this document, the current patterns of disparities in housing and property access stem from before Bellevue was even incorporated as a city. Monitoring the implementation of the plan will be crucial to ensure effectiveness. We also recommend monitoring outcomes to keep track of the market and for early detection of any potential negative unintended consequences.

Implementation Monitoring

- Track total community engagement with related events. Identify and track engagement with specific communities of interest as identified in Section 2. For example, the communities of Crossroads, Eastgate and Factoria; Black/African American residents, Hispanic/Latino residents. Older adults, those living with disabilities, and the city's workforce should all be priority communities.
- Monitor the distribution of resources including housing investment funds and staff time by geography/neighborhood and types of beneficiaries (those identified above).
- Conduct annual equity reviews with line staff to assess whether updated language is meeting the goal of consistent and objective interpretation. Work with staff to further clarify any unclear language.
- Set goals for and track funds raised and unlocked for affordable housing development. Identify neighborhoods and tracts that lack affordable housing.
- Set and track annual or biannual goals for quantity, types, and affordability of housing achieved.

Outcomes and Context Monitoring

- Conduct a periodic updates of key data, including outcomes such as housing cost burden Cost Burden 3.3.4), affordability gap (Section 3.3.2), and location quotients by race and income (Section 3.4.1), evictions (Section 3.5.1). Additional context such as rental and sales market trends and vacancy can also be helpful to monitor.
- Inventory permanently affordable housing and affordable housing conditions at various levels of affordability (Section 3.4.2 & Section 3.4.3).
- For specific anti-displacement measures, use programmatic evaluation data as well as staff and community review to determine effectiveness and to improve tools.