



## ***Racially Disparate Impacts***

### **Introduction**

In 2021, the Washington State Legislature passed House Bill 1220 (HB 1220) as an amendment to the state Growth Management Act (GMA). HB 1220 requires that local governments plan for housing at all income levels and assess the racially disparate impacts (RDI) of existing housing policies. Conditions that indicate that policies have racially disparate impacts can include segregation, cost burden, displacement, educational opportunities, and health disparities.

According to state guidance, there are five steps to understanding and addressing racially disparate impacts:

- Step 1: Engage the Community
- Step 2: Gather & Analyze Data
- Step 3: Evaluate Policies
- Step 4: Revise Policies
- Step 5: Review & Update Regulations

This report accounts for both Step 2 and Step 3 – it includes a summary of findings based on data from the US Census Bureau, US Department of Housing and Urban Development (HUD), and other sources. These findings then inform the policy evaluations and recommendations found at the end of the report.

### **Key Findings**

- Shoreline has the second highest number of properties with racially restrictive covenants in King County, after Seattle. This legacy of exclusion continues to impact demographic patterns and property values in the city today. The western portion of the city, including Richmond Beach, Innis-Arden, and The Highlands, is still predominantly white.
- Shoreline is less diverse than King County, with smaller shares of Asian and Hispanic/Latino residents. The shares of Black/African American and multiracial residents increased slightly between 2009 and 2021.
- In Shoreline, 29 percent of residents have limited English proficiency. Among those who speak a language other than English, 43 percent speak an Asian or Pacific Island language.
- Hispanic/Latino households have the highest level of cost burden among racial and ethnic groups in Shoreline, with 46 percent spending more than 30 percent of their income on housing, compared with 31 percent of white households.
- Black/African American, Native Hawaiian/Pacific Islander, Other Race, and multiracial households are more likely to rent than own their homes, which increases displacement risks for these groups.



- The renter cost burden in Shoreline is driven by a shortage of rental units at the high and low ends of the market. To meet current demand for rental units, the city needs to add 955 new units priced below 30 percent AMI and 1,215 new units priced above 80 percent AMI. This does not account for the future need driven by population growth.
- The Meridian Park neighborhood adjacent to Aurora Avenue has a high concentration of BIPOC households as well as a higher displacement risk than much of the rest of the city. However, PSRC considers it a moderate- to high-opportunity area.

### Historical Context

Throughout the history of the United States, a combination of laws and practices have impacted where specific groups of people live, what opportunities they have access to, and their ability to build wealth through stable housing. Unfortunately, many of these policies explicitly or implicitly benefited white residents at the expense of all others. The legacy of policies like redlining, which used racial criteria in determining which neighborhoods were suitable for government-backed loans, highway development through predominantly-Black neighborhoods, and racial covenants explicitly excluding certain groups from owning specific properties continues to impact non-white communities today.

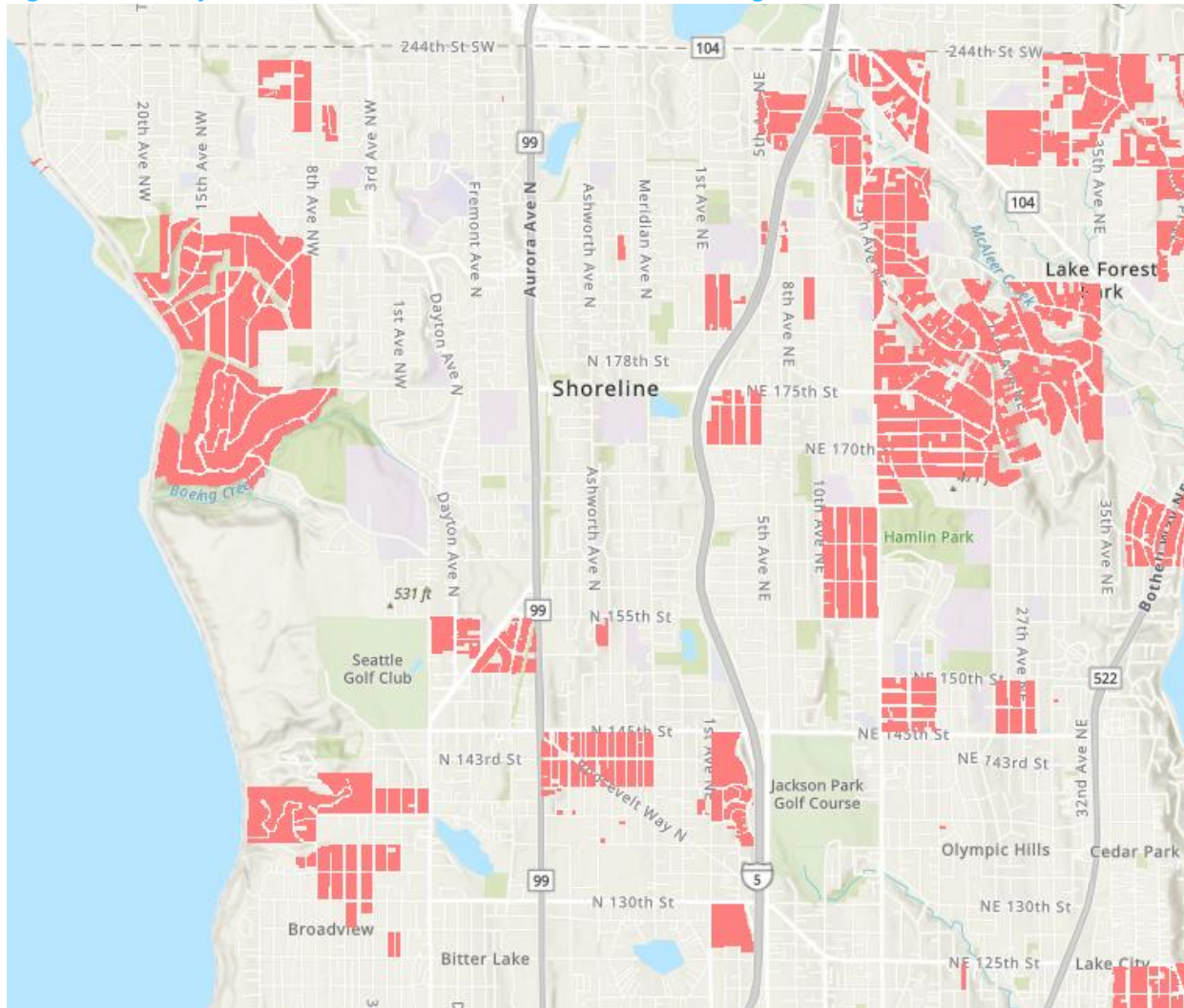
While many cities have acknowledged the harms of these policies, many of which are no longer legal, there are still policies in effect today that hold cities back from rectifying systemic harms. These can include policies that reference vague concepts like “neighborhood character,” as well as those that permit only the most expensive homes to be built, thus shutting lower-income residents out of high-opportunity areas.

This section contains a historic review of some of the known policies and programs that caused racially disparate impacts in Shoreline as a starting point in understanding present-day conditions.

Throughout the United States, racial covenants were used to exclude certain races and religious groups from residing in specific neighborhoods, creating exclusive areas for white, Christian residents. These deed restrictions were legally enforceable from 1927 to 1968. According to the Washington State Racial Restrictive Covenants Project, Shoreline had the second highest number of racially restricted properties in King County, after Seattle, with a total of 2,951 restrictive covenants. The Innis Arden neighborhood has a particularly high concentration of these restrictions. While other neighborhoods have diversified over time, this area remains predominantly white. It also has some of the highest residential property values in the city, as shown in Figure 42 below.



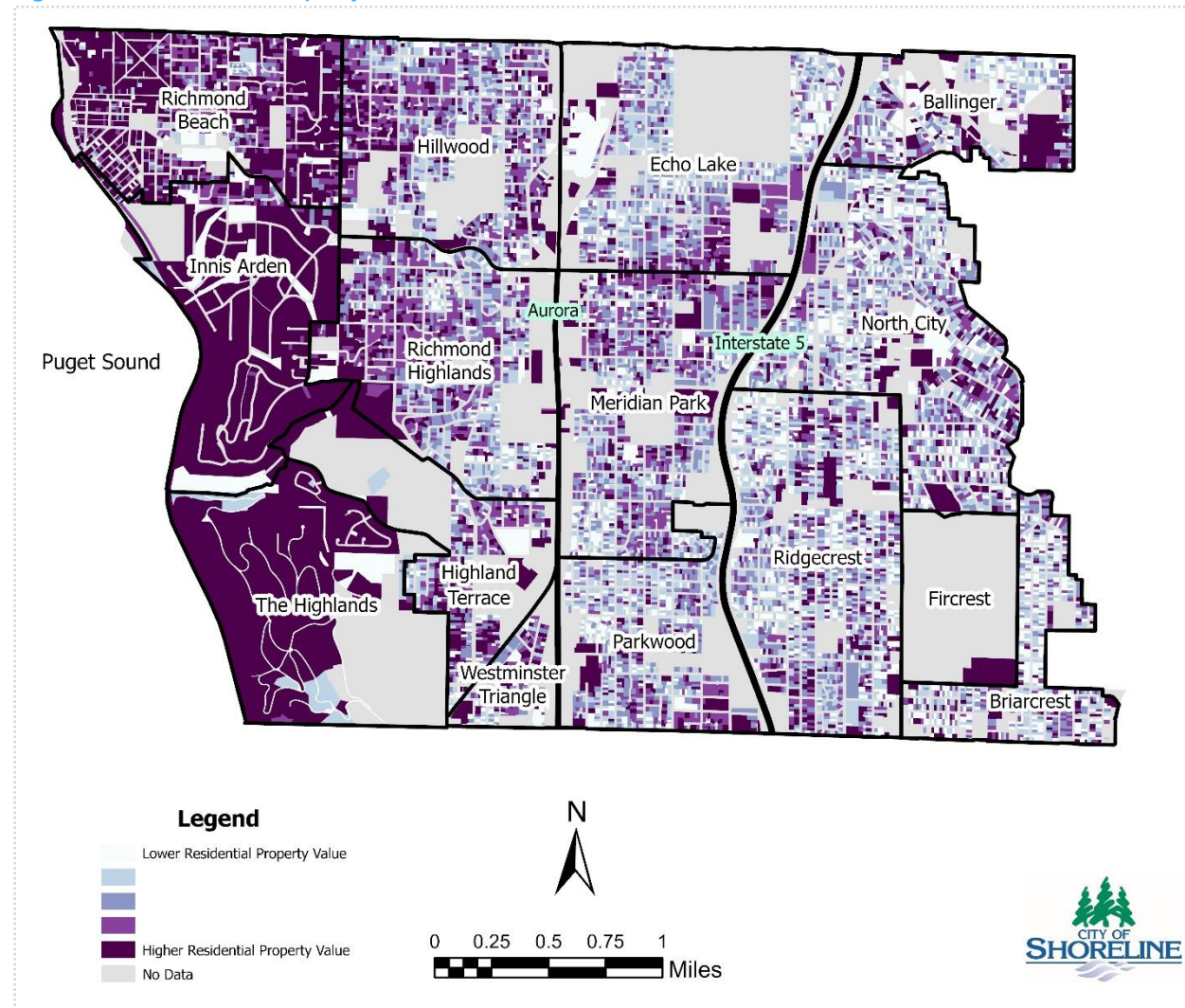
Figure 41. Racially Restricted Parcels in Shoreline and Surrounding Areas



Source: Washington State Racial Restrictive Covenants Project.



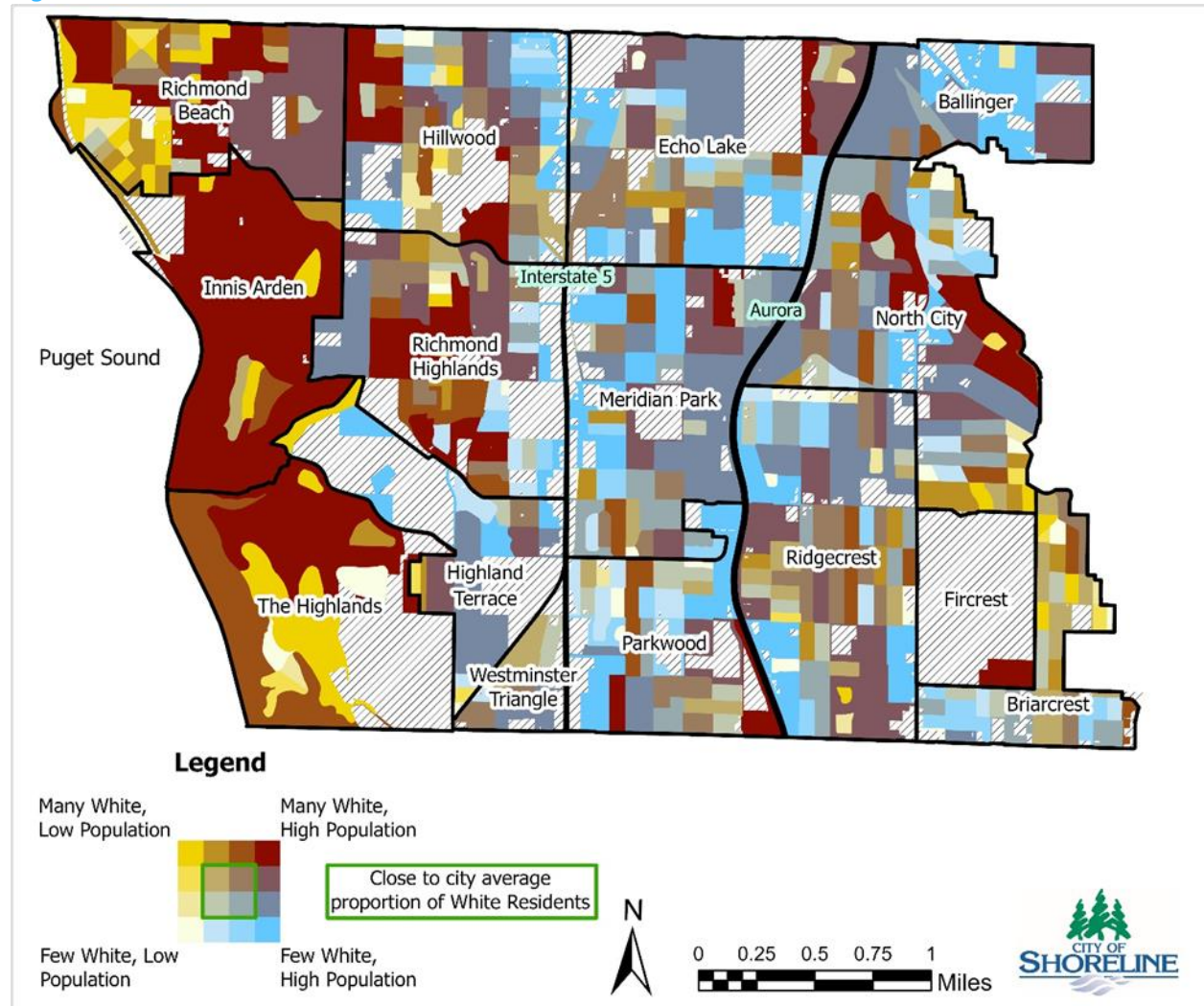
**Figure 42. Residential Property Values in Shoreline**



Source: City of Shoreline



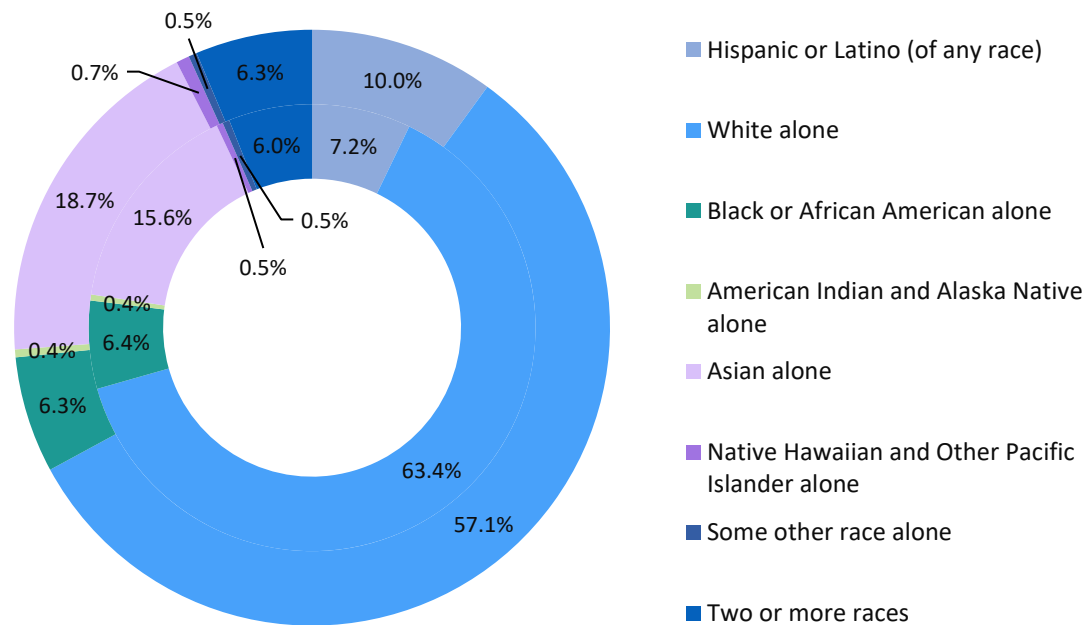
**Figure 43. Distribution of White Residents in Shoreline**





The combination of racially restrictive covenants and redlining impacted the ability of Black veterans to fully access homeownership loan benefits through the Servicemen’s Readjustment Act of 1944 (GI Bill), which enabled white veterans to buy housing and build wealth in the suburbs. Racial covenants have since been declared unconstitutional, and Fair Housing laws have been put into effect. However, as of 2021 Shoreline is still less diverse than King County overall.

**Figure 44. Race and Ethnicity of Populations**



Source: US Census 2021 5-Year ACS, Table DP05.



### Assessing Racially Disparate Impacts

Between 2015 and 2020, Shoreline became slightly more diverse. The City gained nearly 1,500 Asian residents and over 600 Black/African American residents. At the same time, however, the number of American Indian/Alaska Native and Hispanic/Latino residents declined. Over the same period, King County’s population went from 63 percent white to 58 percent white, with Asian, Hispanic/Latino, and multiracial residents seeing the biggest countywide gains.

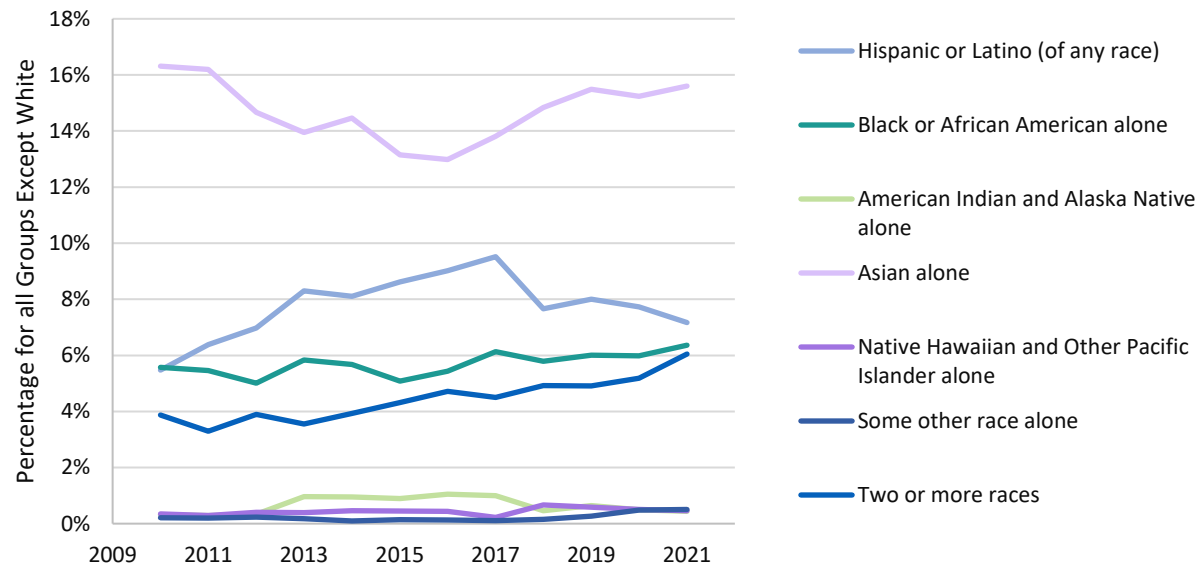
**Figure 45. Change in Population by Race/Ethnicity, Shoreline and King County**

Race or Ethnic Category	Shoreline			King County		
	2015	2020	Change	2015	2020	Change
American Indian and Alaska Native	490	281	-209	11,972	10,307	-1,665
Asian	7,200	8,657	1,457	317,214	405,835	88,621
Black or African American	2,782	3,400	618	123,350	141,566	18,216
Hispanic or Latino (of any race)	4,718	4,394	-324	189,808	218,763	28,955
Native Hawaiian and Other Pacific Islander	245	286	41	15,681	16,673	992
Other Race	78	277	199	3,756	9,449	5,693
Two or more races	2,363	2,946	583	99,291	127,070	27,779
White	36,898	36,594	-304	1,284,684	1,295,401	10,717
<b>Total</b>	<b>54,774</b>	<b>56,835</b>	<b>2,061</b>	<b>2,045,756</b>	<b>2,225,064</b>	<b>179,308</b>

Source: US Census Bureau, 2011-2015 and 2016-2020 American Community Survey 5-Year Estimates (Table DP05); Washington Department of Commerce, 2023



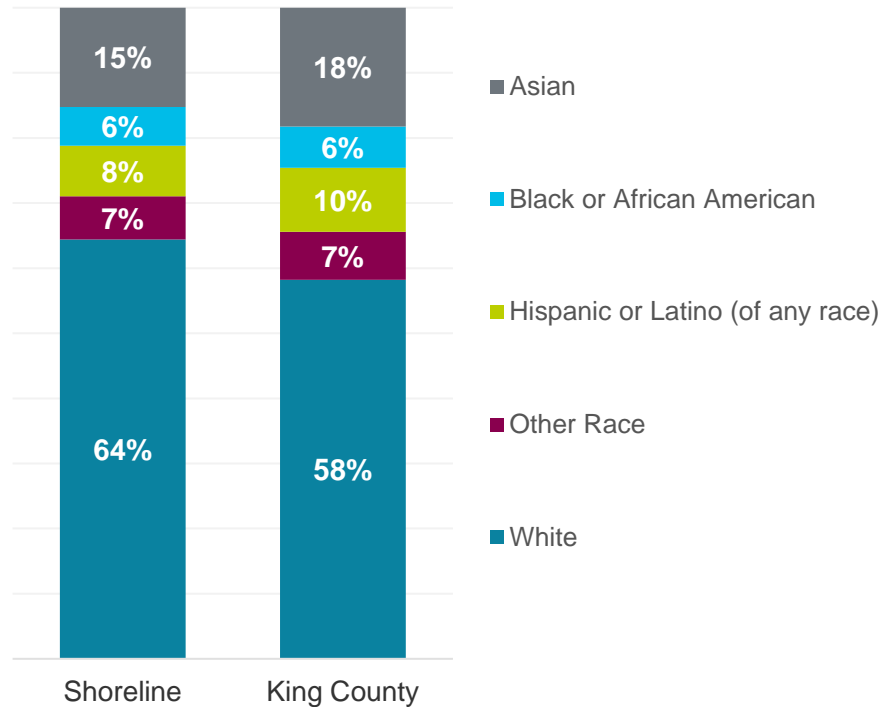
**Figure 46. Race and Ethnicity in Shoreline: All Groups Except White**



Source: US Census Bureau, 2010-2021 ACS 5-Year Estimates, Table DP05.



**Figure 47. Racial Composition of Shoreline and King County (2020)**

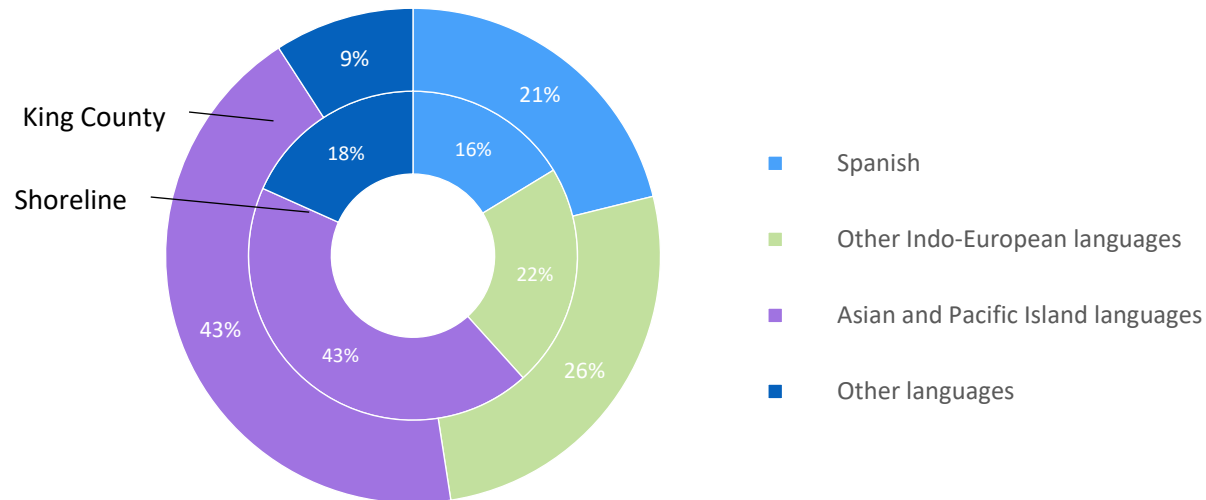


Source: US Census Bureau, 2016–2020 American Community Survey 5-Year Estimates (Table DP05); Washington Department of Commerce, 2023.

Among Shoreline households, 29 percent have limited English proficiency. The most commonly spoken non-English languages in Shoreline are Asian and Pacific Island languages and Other Indo-European languages. The share of residents with limited English proficiency aligns with the rest of the county.



**Figure 48. Languages Spoken Other Than English**

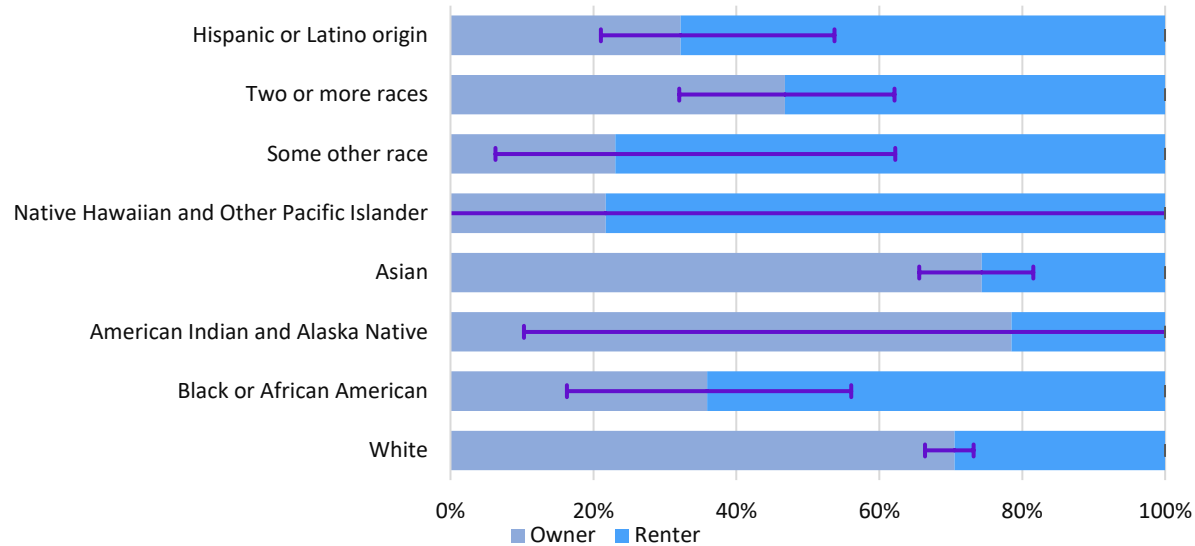


Source: US Census Bureau, 2021 ACS 5-Year Estimates, Table S1601.

Shoreline is home to over 14,000 homeowner households and 8,000 renter households. Of the homeowner households, 25 percent are cost burdened, with 16 percent spending between 30 percent and 50 percent of their income on housing costs and nine percent spending more than half of their income on housing costs. By contrast, 49 percent of renter households in Shoreline are cost burdened, with 22 percent spending between 30 and 50 percent of their income on housing costs and 27 percent spending more than half of their income on housing costs. This sharp divide in stability between renters and owners can result in racially disparate impacts when renters are more likely to be people of color. In Lynden, 67 percent of Black/African American households, 61 percent of Hispanic/Latino households, and 57 percent of Other Race households rent their homes, compared with 33 percent of white households.



**Figure 49. Proportion of Owners and Renters by Race and Ethnicity**



Source: US Census Bureau, 2021 ACS 5-Year Estimates, Table S2502.

In Shoreline, white households are least likely to be cost burdened. Just 16 percent of white households spend between 30 and 50 percent of their income on housing, while 15 percent spend more than 50 percent of their income on housing. In contrast, 46 percent of Hispanic/Latino households in Shoreline are cost burdened and 30 percent of Black/African American households are severely cost burdened.

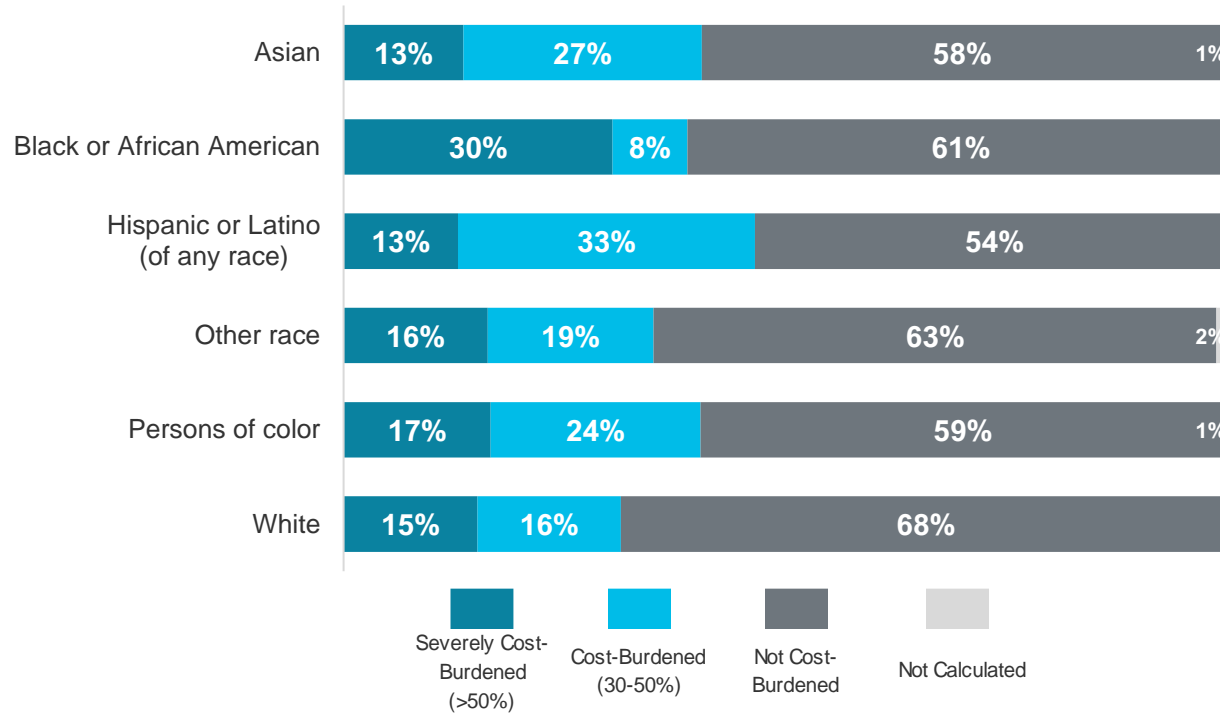


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Figure 50. Cost Burden for Shoreline Households by Race and Ethnicity



Source: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 9); Washington Department of Commerce, 2023.



**Figure 51. Shoreline Households by Race, Ethnicity, Tenure, and Cost Burden**

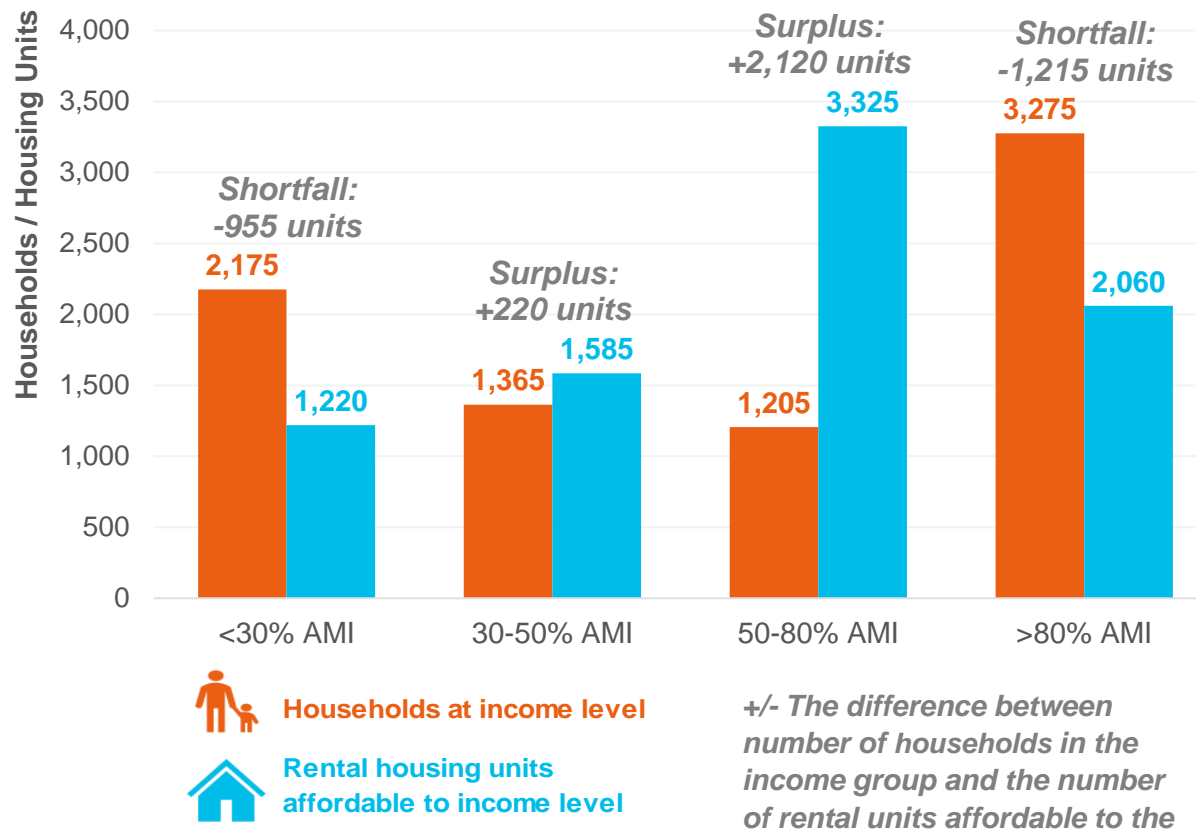
	White	Black or African American	Asian	American Indian or Alaska Native	Pacific Islander	Other Race	Hispanic or Latino (of any race)	Total
<b>Owner Households</b>								
Not Cost Burdened	8,165	205	1,450	55	25	290	300	10,490
Total Cost-Burdened	2,525	130	705	15	0	55	105	3,535
<i>Cost-Burdened (30-50%)</i>	1,555	55	515	0	0	40	95	2,260
<i>Severely Cost-Burdened (&gt;50%)</i>	970	75	190	15	0	15	10	1,275
Not Calculated	25	0	0	0	0	0	0	25
<b>Total</b>	<b>10,715</b>	<b>335</b>	<b>2,150</b>	<b>70</b>	<b>25</b>	<b>345</b>	<b>405</b>	<b>14,045</b>
<b>Renter Households</b>								
Not Cost Burdened	2,710	415	375	35	0	240	265	4,040
Total Cost-Burdened	2,425	260	550	40	105	140	380	3,900
<i>Cost-Burdened (30-50%)</i>	1,005	30	320	40	65	45	255	1,760
<i>Severely Cost-Burdened (&gt;50%)</i>	1,420	230	230	0	40	95	125	2,140
Not Calculated	40	0	40	0	0	20	0	100
<b>Total</b>	<b>5,175</b>	<b>675</b>	<b>965</b>	<b>75</b>	<b>105</b>	<b>395</b>	<b>640</b>	<b>8,030</b>
<b>Total Households</b>	<b>15,890</b>	<b>1,010</b>	<b>3,115</b>	<b>145</b>	<b>130</b>	<b>740</b>	<b>1,045</b>	<b>22,075</b>

Source: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 9); Washington Department of Commerce, 2023.

The renter cost burden in Shoreline is driven by a shortage of rental units at the high and low ends of the market (greater than 80 percent AMI and less than 30 percent AMI). Figure 52 below shows the current number of households compared with the number of units affordable to households in each income level. When there are shortages of units corresponding to a given income level, those households will rent units affordable to a different income level. For instance, the lack of housing at greater than 80 percent AMI indicates that there are likely renters at that income level renting units in the 50 to 80 percent range, making it harder for households in that income range to find housing. Alternatively, the shortage of housing units at the less than 30 percent AMI range indicates that households at that income level are likely cost burdened due to having to rent more expensive apartments.



Figure 52. Shoreline Renter Households by Income Compared to Rental Units by Affordability, 2019

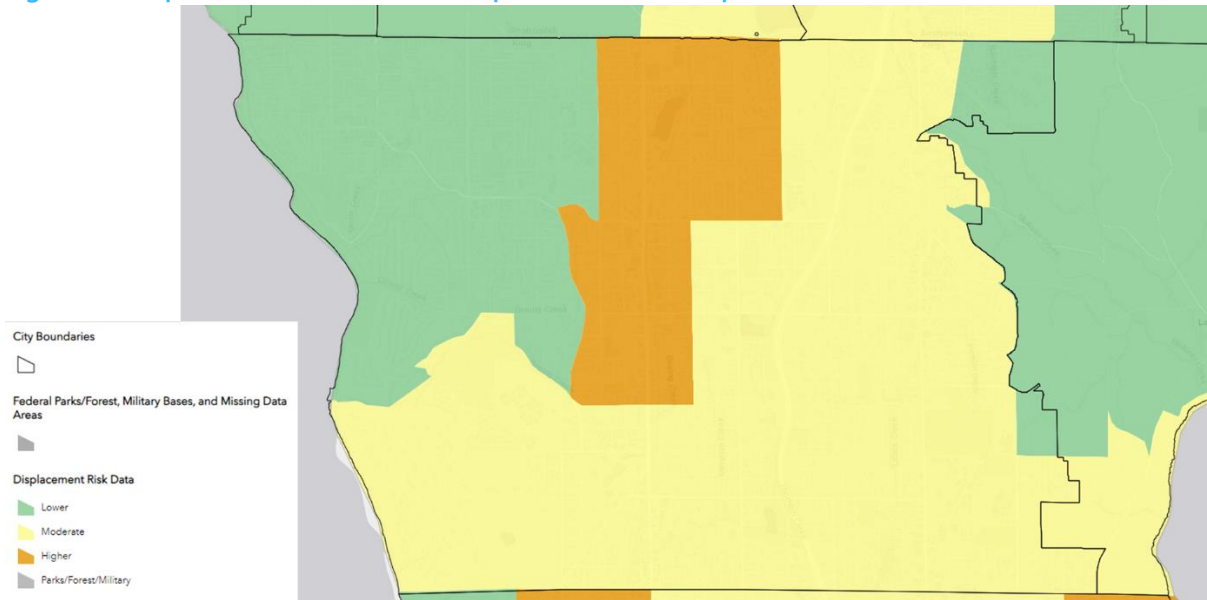


Sources: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 15C) & US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 14B).

Figure 53 below shows the PSRC Displacement Risk Map for the city of Shoreline. PSRC uses indicators including demographics, transportation, neighborhood characteristics, housing, and civic engagement to identify communities vulnerable to displacement. The western and southern portions of the city have a moderate displacement risk while the central portion along Aurora Avenue N has a higher displacement risk. The northwestern portion of the city, where there was a high concentration of restrictive covenants has the lowest displacement risk.



Figure 53. Department of Commerce Displacement Risk Map for Shoreline

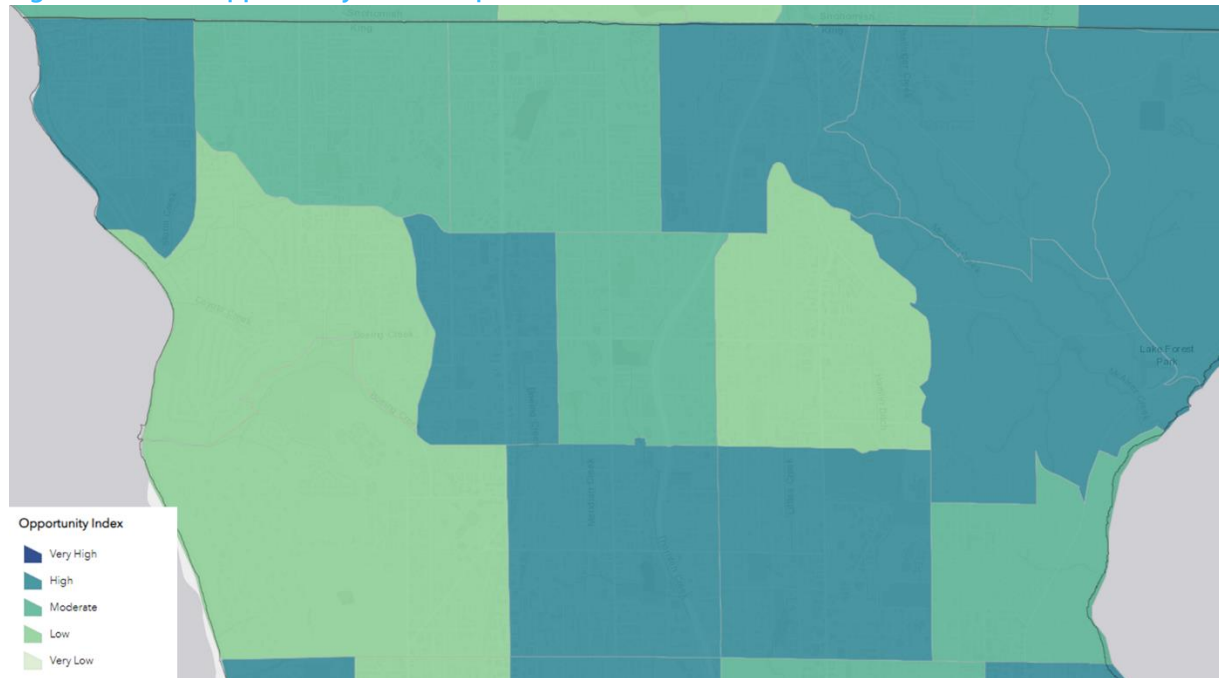


Source: Puget Sound Regional Council (PSRC) Displacement Risk Map.

Figure 54 below shows PSRC’s Opportunity Index map for Shoreline. The Opportunity Index is based on measures of positive life outcomes, including education, economic health, housing and neighborhood quality, mobility and transportation, and health and environment. The dark blue areas are those with the high index scores (there are no Census tracts in Shoreline with a score of “Very High”), while the lighter green areas are considered lower opportunity. The Innis-Arden neighborhood is considered lower-opportunity because of housing and health metrics, while most of the Richmond Highlands neighborhood is higher opportunity due to strong economics, housing, health, and transportation metrics.



**Figure 54. PSRC Opportunity Index Map for Shoreline**



Sources: PSRC Opportunity Index.

In Shoreline there is racial divide in income distribution. Citywide, 51 percent of households make above 100 percent AMI – this includes 53 percent of white households, 48 percent of Asian households, 40 percent of Hispanic/Latino households, 37 percent of Black/African American households, and 19 percent of Pacific Islander households. While just 15 percent of households make below 30 percent AMI, 81 percent of Pacific Islander households and 26 percent of Black households fall into that category.



**Figure 55. Shoreline Count of Households by Income and Race**

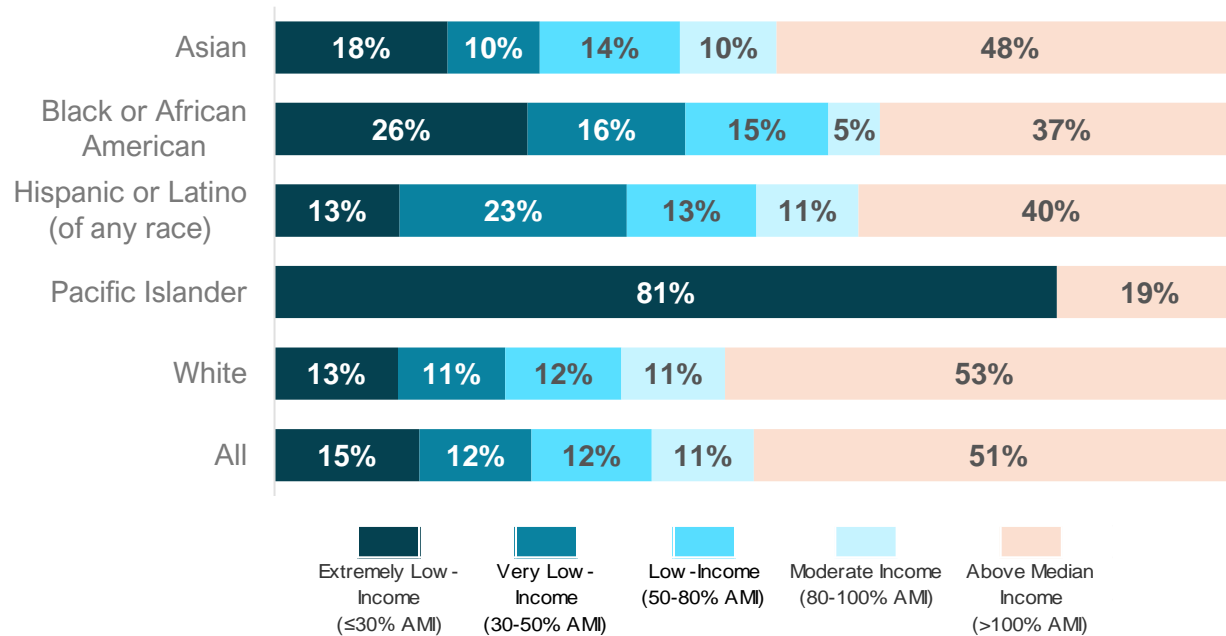
Income Category (% of AMI)	American Indian or Alaska Native	Asian	Black or African American	Hispanic or Latino (of any race)	Pacific Islander	White	Not Reported*	All
<b>Number</b>								
Extremely Low-Income ( $\leq 30\%$ AMI)	30	555	265	135	105	2,025	185	3,300
Very Low-Income (30-50%)	40	295	165	245	-	1,760	45	2,550
Low-Income (50-80%)	35	450	150	140	-	1,905	60	2,740
Moderate Income (80-100%)	10	310	54	110	-	1,700	141	2,325
Above Median Income ( $> 100\%$ )	35	1,495	380	415	25	8,495	295	11,140
Total for published estimates	150	3,105	1,014	1,045	130	15,885	726	22,060
<b>Percentage</b>							<b>Not Reported</b>	
Extremely Low-Income ( $\leq 30\%$ AMI)	1%	17%	8%	4%	3%	61%	6%	
Very Low-Income (30-50%)	2%	12%	6%	10%	0%	69%	2%	
Low-Income (50-80%)	1%	16%	5%	5%	0%	70%	2%	
Moderate Income (80-100%)	0%	13%	2%	5%	0%	73%	6%	
Above Median Income ( $> 100\%$ )	0%	13%	3%	4%	0%	76%	3%	

\* The category "Other (including multiple races, non-Hispanic)" is suppressed in source data (CHAS 2015-2019 Table 1)

Sources: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 1) & US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 8).



Figure 56. Shoreline Distribution of Households by Income and Race or Ethnicity

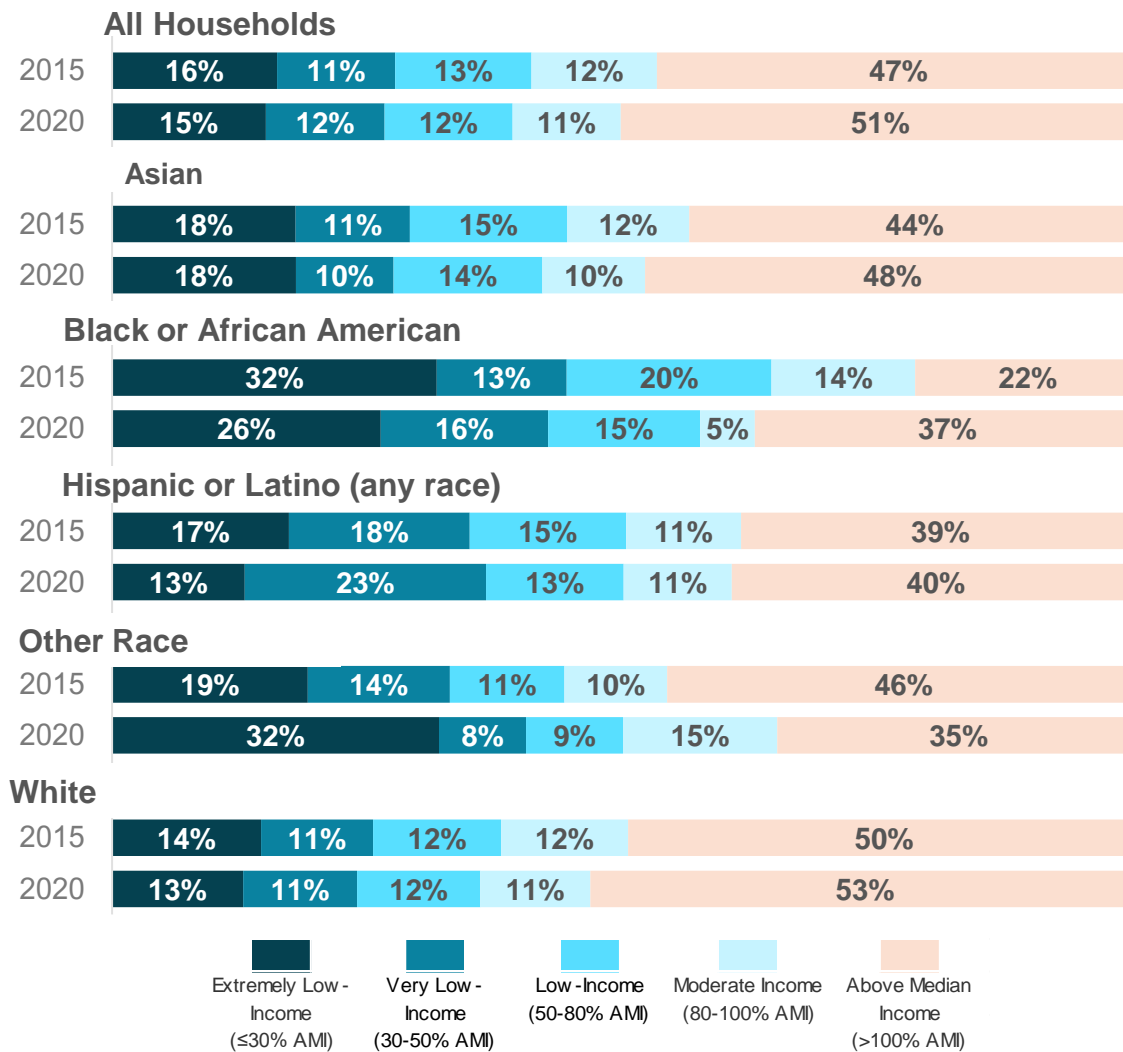


Sources: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 1).

Between 2015 and 2020, the percentage of households making above the median income in Shoreline increased from 47 percent to 51 percent. With the exception of households identifying as Other Race, the share of households making more than 100 percent AMI increased across racial groups. While 22 percent of Black/African American households in Shoreline earned more than the median income in 2015, 37 percent were above that income level in 2020. At the same time, the share of Black/African American households making less than 30 percent AMI decreased from 32 percent to 26 percent.



Figure 57. Shoreline Percentage of All Households by Income Category and Race (2010-2014 vs. 2015-2019)



Sources: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 1).



### Policy Evaluation

Based on the above analysis, there is room for improvements to policies in Shoreline to reduce racially disparate impacts, and the data was used to inform the next steps of the racially disparate impacts assessment process – evaluating and revising policies that reinforce historical patterns of segregation, displacement, and inequitable outcomes. Taking a proactive approach in shaping policy to address these challenges will benefit all Lynden households as the city seeks to build a more equitable future.

Based on guidance provided by the Washington State Department of Commerce, the following policy evaluation framework was used to evaluate Anacortes’s existing Housing Element policies:

Criteria	Evaluation
The policy is valid and supports meeting the identified housing needs. The policy is needed and addresses identified racially disparate impacts, displacement and exclusion in housing.	<b>S</b> Supportive
The policy can support meeting the identified housing needs but may be insufficient or does not address racially disparate impacts, displacement and exclusion in housing.	<b>A</b> Approaching
The policy may challenge the jurisdiction’s ability to meet the identified housing needs. 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.	<b>C</b> Challenging
The policy does not impact the jurisdiction’s ability to meet the identified housing needs and has no influence or impact on racially disparate impacts, displacement or exclusion.	<b>NA</b> Not applicable



Housing Goal or Policy	Topic	Benefit or Burden	Evaluation Score	Evaluation (Why?)	Revision or New Policy	Rationale	RDI Category
<b>GOALS</b>							
Goal H I Provide sufficient development capacity to accommodate the 20 year growth forecast and promote other goals, such as creating demand for transit and local businesses through increased residential density along arterials; and improved infrastructure, like sidewalks and stormwater treatment, through redevelopment.	New Development	This goal benefits developers and the City. This goal benefits community members if redevelopment is constructed for affordable housing programs as designated by community vetted needs.	A	This goal approaches supporting anti-displacement policy by joining state growth forecasts with planning for adequate infrastructure to serve existing and new households within a service area. This goal only approaches supporting anti-displacement policy by using vague terminology and not connecting infrastructure improvements to anti-displacement measures. <i>Recommendation</i>	Revised Goal (H I): Provide sufficient development capacity to meet 2044 regional growth and address other housing goals, such as creating demand for transit and local businesses through increased residential density along arterials; and improved infrastructure, like sidewalks and stormwater treatment, through redevelopment and inclusionary zoning. New Goal (In	Changed language from "promote other Goals" to "address other housing goals" in order to describe the goal's intent more accurately and to distribute the benefits of the policy more equitably. "Inclusionary zoning" was included at the end of the goal to enforce the intention to include permanent affordable units within new residential development along arterials .	Ensure the benefits of investment and development are equitably distributed.



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				<p>: To make this goal more actionable and implementable for anti-displacement regulatory purposes, goal language should use consistent desired housing type verbiage to ensure the benefits of housing development are distributed equitably.</p>	<p>addition to H I): Implement anti-displacement regulations, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.</p>		
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Goal H II Encourage development of an appropriate mix of housing choices through innovative use and well-crafted regulations.	New Development	This goal benefits community members and developers.	A	This goal approaches addressing exclusion in housing by encouraging development of a mix of housing types. Allowing additional permitted uses in the City's single family housing regulations reduces exclusion when different family sizes, incomes, disabilities, and needs have housing choices on the market available to them. However, the term "appropriate" is vague and broad. Who will the housing be appropriate for? <i>Recommendation</i> : To make this goal more	Revised Goal (Goal H II): : Encourage development of a wider variety of housing types at all affordability levels through innovative land use, well-crafted regulations, and marketable development incentives.	Changed "an appropriate mix of housing choices" to "a wider variety of housing types" to described the goal's intent more accurately and to distribute the benefits of the policy more equitably.	Ensure the benefits of investment and development are equitably distributed.
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				actionable and implementable for anti-displacement regulatory purposes, goal language should use consistent housing type verbiage to ensure the benefits are distributed equitably amongst different income level households.			
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Goal H III Preserve and develop housing throughout the city that addresses the needs of all economic segments of the community, including underserved populations, such as households making less than 30% of Area Median Income.	New Development	This goal benefits community members of all economic segments. This goal may burden developers if affordable housing incentives are not created or marketed by the city.	S	This goal supports anti-displacement policy by encouraging development for all economic segments of the community, and specifically identifying households making less than 30% of Area Median Income. Identifying this income bracket will help guide subsequent policies that specifically address affordable housing production at this income bracket.			Increase affordable housing production.
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Goal H IV “Protect and connect” residential neighborhoods so they retain identity and character, yet provide amenities that enhance quality of life.	Amenity Access	This goal benefits existing neighborhoods and households if "protecting" and "retaining" the character of residential neighborhoods includes equitable distribution of amenities.	A	This goal approaches supporting anti-displacement policy by protecting residential neighborhood character and providing amenities that enhance quality of life. Protecting residential character can help homeowners and renters retain housing stability and preventing displacement. Although, preservation and "identity" language must be evaluated carefully to ensure the narrative of the policy does not enforce exclusionary practices	Revised Goal (G H IV): “Protect and connect” residential neighborhoods so they maintain scale and form and character based on community needs, yet provide equitable distribution of amenities that enhance quality of life.	Changed “provide amenities” to “provide the equitable distribution of amenities” to describe the intent more accurately and to distribute the benefits of the policy more equitably. Changed “character” to “scale and form” to make the policy clearer and avoid an exclusionary narrative pertaining to maintaining specific "household" types like single family residential in a community.	Ensure the benefits of investment and development are equitably distributed.
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				<p>towards BIPOC populations or specific income levels .</p> <p><i>Recommendation</i> : The Washington State Department of Commerce guides cities to adopt incentives, strategies, actions, and regulations that encourage equitable development and mitigate displacement. Policies that encourage or promote development of new amenities should include "equitable distribution" language to ensure that the benefits of new development are</p>			
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				planned with equity in mind.			
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Goal H V Integrate new development with consideration to design and scale that complements existing neighborhoods, and provides effective transitions between different uses and intensities.	Design Standards	This goal benefits existing neighborhoods and households by considering how the design, scale, and form of new development may impact existing households and neighborhoods. This goal may burden developers if design guidelines increase the overall construction costs of the project.	A	This goal approaches supporting anti-displacement policy by considering how design and scale of new development may impact existing neighborhoods. However, this goal does not specify how redevelopment can also impact existing neighborhoods by increasing displacement risk through rising housing costs. This goal also does not consider the impact of new development on the general needs of the community, such as amenities, facilities, and	Revised Goal (H V): Integrate new development and redevelopment with consideration to design and scale that complements and maintains the needs of existing neighborhoods, and provides effective transitions between different uses and intensities.	Included "and maintains the needs of existing neighborhoods" to clarify that new development and redevelopment could impact amenities, facilities, green space, home values, and communal space of existing neighborhoods. Included "redevelopment" to clarify that redevelopment projects will also need to be examined for unintentional impacts to existing neighborhoods.	Protect Existing Communities.
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				<p>green space. Complimentary designs and impact analyses could be required by the City to protect the function and form of existing neighborhoods.</p> <p><i>Recommendation</i> : Add language to clarify applicable factors to be reviewed during new development or redevelopment projects.</p>			
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Goal H VI Encourage and support a variety of housing opportunities for those with special needs, specifically older adults and people with disabilities.	Older Adults and Special Needs	This goal benefits communities at higher risk of displacement, especially those communities that rely on fixed incomes and require additional accommodations.	A	This goal approaches supporting anti-displacement policy by supporting actions to create or maintain housing opportunities specifically for those with "special needs". Older adults and people with disabilities are often more vulnerable to displacement risks due to sometimes unpredictable economic and physical pressures. This goal encourages the city to keep implementing and monitoring "special needs" housing at the forefront of housing planning	Revised Goal (H VI): Encourage a variety of healthy, safe, and affordable housing opportunities for those with special needs, specifically older adults, and people with disabilities.	Included "healthy, safe, and affordable" to make the intent of the goal clearer and more actionable.	Protect existing communities .
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				<p>priorities. However, language of the goal does not specify what type of housing opportunities should be supported. This lack of specification may make it harder to prioritize and select the most efficient housing programs and projects related to senior and disability needs.</p> <p><i>Recommendation</i> : Add language to include key housing opportunity categories for the City to prioritize.</p>			
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Goal H VII Collaborate with other jurisdictions and organizations to meet housing needs and address solutions that cross jurisdictional boundaries.	Public and Private	This goal benefits the community by creating platforms to share specific wants and needs of City residents. This goal also benefits the City by pooling resources, funding, and technical assistance.	A	This goal approaches supporting anti-displacement policy by encouraging collaboration of multiple parties to pool resources, funding, and technical assistance across borders. Developing partnerships and frequent communication lines with surrounding jurisdictions will inform the City of adjacent housing decisions, projects, and programs that may affect housing within Shoreline's borders. However, collaboration should not stop	Revised Goal (H VII): Collaborate and partner with community organizations, other jurisdictions, landowners, developers, and non-profits to meet housing needs and address solutions that cross jurisdictional boundaries.	Replaced "collaborate with other jurisdictions and organizations" with "collaborate and partner with community organizations, other jurisdictions, landowners, developers, and non-profits" to capture the full spectrum of public and private partnerships required to meet the community's housing needs.	Ensure the benefits of investment and development are equitably distributed.
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				<p>at other jurisdictions and organizations. Community organizations, landowners, developers, and non-profits will also be vital partnerships to meet housing needs and identify housing solutions.</p> <p><i>Recommendation</i> : Add language to include all applicable and important partnerships to meet housing needs.</p>			
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Goal H VIII Implement recommendations outlined in the Comprehensive Housing Strategy.	Regulations	This goal benefits community members and developers for recommended policies under the Housing Element include benefits and incentives to both parties.	A	This goal approaches supporting anti- displacement policy by implementing all recommendations outlined in the Housing Element of the Comprehensive Plan, but it does not account for the implementation and monitoring procedures required to ensure the success of the recommendations. <i>Recommendation</i> : Add language to reference policies that support using specified measures to track implementation and performance of policies.	New Goal (to replace H VIII): Develop implementation strategies, performance measures, and on-going monitoring procedures that account for all city housing action plans to ensure the success of recommendations outlined in the Comprehensive Housing Strategy.	New goal language clarifies the need for implementation strategies and on- going monitoring. Continuation of monitoring, implementation, and community engagement will capture how the City continues to change and grow, and will help continue to address Shoreline’s changing housing needs and challenges.	Begin to undo racially disparate impacts, exclusion, and displacement.
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				Ensure policies are working as intended to address racially disparate outcomes, exclusion, displacement, and displacement risk.			
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Goal H IX Develop and employ strategies specifically intended to attract families with young children in order to support the school system.	Public Facilities	This goal benefits demographics that currently have higher percentages of families with young children. This policy burdens other household family sizes that may not inherently benefit from proposed strategies.	C	This goal challenges supporting anti- displacement policy because the language is exclusionary to other household sizes. <i>Recommendation</i> : This goal should be moved to the Land Use Element of the Comprehensive Plan to remain consistent with Land Use goals pertaining to public facilities (i.e., school system). A new goal should replace H IX to support all types of household sizes and encourage a variety of amenities associated with healthy neighborhoods.	New Policy (To replace H IX): Increase the availability of healthy, equitable, and affordable housing for people in all demographic groups and at all income levels. Promote a balance of housing and amenities needed by residents at the neighborhood level, such as childcare, availability of fresh food, education, recreational opportunities, and medical care.	New goal language now encompasses more of the recommended policies and policy topics below.	Ensure the benefits of investment and developmen t are equitably distributed.
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POLICIES							
H1 Encourage a variety of residential design alternatives that increase housing choice.	Design Standards	This policy benefits all community members and developers.	A	This policy approaches addressing exclusion in housing by encouraging a variety of residential design alternatives. Having an alternative menu of permitted residential designs, such as middle housing types, will provide housing for different family sizes and incomes. However, language of this policy is unclear as "residential design alternatives" is not defined and the desired location of these alternative designs is not	Revised Policy (H1): Allow and incentivize a wider variety of housing types at all affordability levels in all residential areas.	Changed "encourage a variety of residential design alternatives" to "allow and incentivize a wider variety of housing types at all affordability levels" to describe the policy intent more accurately and to distribute the benefits of the policy more equitably. The housing market and developers are inclined to build affordable housing when they receive value and profit from the project. The word "incentivize" is included to off-set value lost when developers integrate affordability on their own (i.e., grants available to	Ensure the benefits of investment and development are equitably distributed.



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				<p>specified.</p> <p><i>Recommendation</i> : To make the policy more actionable, additional language should use consistent desired housing type verbiage and desired location specifications to ensure the benefits of development are distributed equitably.</p>		<p>affordable housing developers, density bonuses, etc.)</p>	
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H2 Provide incentives to encourage residential development in commercial zones, especially those within proximity to transit, to support local businesses.	Amenity Access	This policy benefits developers who can expand housing construction opportunities in commercial areas or public transit areas. This policy benefits households that can afford the costs of homeowner or rental units near amenities. This policy may burden existing neighborhoods within or near new construction and redevelopment areas.	C	This policy could challenge the jurisdiction's ability to meet housing needs from the unequitable distribution of benefits and burdens to neighborhoods adjacent to new residential development in commercial zones. New residential development can gentrify existing neighborhoods and increase home values near highly desired amenities, such as transit and local businesses. As discussed in Appendix C, new residential development near amenities can increase the	New Policy (To replace H2): Encourage the development of a wider variety of housing types in areas with existing infrastructure capacity, services, and transit, while balancing the need to address disinvestment in historically disinvested neighborhoods.	Clarified that a "wider variety of housing types" is appropriate in areas with existing infrastructure. Acknowledged that underinvestment in existing neighborhoods also needs to be addressed. This policy would require consistency with capital facilities element policies to increase infrastructure capacity in historically disinvested neighborhoods where greater density and housing diversity is needed.	Ensure the benefits of investment and development are equitably distributed.
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				<p>likelihood of economic displacement risk.</p> <p><i>Recommendation</i> : Anti-displacement policies will be needed to mitigate and reduce the impacts of redevelopment and upzoning in existing neighborhoods, especially for BIPOC communities and low-income households.</p>			
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H3 Encourage infill development on vacant or underutilized sites.	New Development	This policy benefits landowners and developers. However, redevelopment has the potential to burden existing neighborhoods and increase average City rental prices.	A	Removing barriers to development of affordable housing will help increase affordable housing unit accessibility and attainability in the City. At the same time, this policy does not specify the type of infill development that is encouraged. This policy could be supporting more market rate housing or single-family residences in existing neighborhoods, which in turn increases the likelihood of economic displacement (i.e., increased property taxes	Policy Revision (H3): Encourage infill development on vacant or underutilized sites by working with developers, state agencies, regional partnerships, and non-profits to identify locations, funding opportunities, and implementation strategies. New Policy (In addition to H3): In neighborhoods of naturally occurring affordability, maintain the scale and form of buildings in established residential neighborhoods through	The revised policy now includes action items (partnerships) to provide a pathway to achieve infill development on vacant or underutilized sites. The new policy provides a building design solution to infill development, tailored to the needs of the community, and supports allowing existing residents to stay in their homes as much as possible.	Protect existing communities .
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				<p>and home values in the surrounding areas).</p> <p><i>Recommendation</i> : An accompanying anti-displacement policy could be adopted to ensure building scale and form are consistent in neighborhoods.</p>	<p>adoption of context-sensitive regulations.</p>		
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H4 Consider housing cost and supply implications of proposed regulations and procedures.	Regulations	This policy benefits existing community members by reviewing potential regulatory changes for unintended impacts. This policy could burden developers, applicants, and landowners if proposed regulations and procedures reduce cost burdens for the homeowner or renter, but increase development cost burdens for the applicant.	A	This policy encourages an additional process toward evaluating the potential impacts of policy changes, such as allowing specific types of units within a neighborhood, before implementing new regulations and procedures. Considerations for the regulatory effects upon a neighborhood's displacement risk is important to preserve neighborhood stability. This policy approaches supporting anti-displacement policy by encouraging a cost/benefit	Policy Revision (H4): Review <i>broader housing market impacts, housing costs, and housing supply implications of proposed regulations and procedures.</i> New Policy (In addition to H4): <i>Use measures to track implementation and performance to ensure policies are working as intended to address racially disparate outcomes, exclusion, displacement, and displacement risk.</i>	The revised policy acknowledges the effect the private side of development has on the housing landscape. The new policy compliments H4 by providing a follow-up procedure to ensure that implications considered have resulted in expected outcomes.	Begin to undo racially disparate impacts, exclusion and displacement.
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				<p>analysis of proposed regulations and procedures, but it does not specify the kinds of implications considered.</p> <p><i>Recommendation</i> : An additional anti-displacement policy could be considered to provide a specific anti-displacement and equitable regulatory lens to a proposed regulations and procedures cost/benefit analysis.</p>			
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H5 Promote working partnerships with public and private groups to plan and develop a range of housing choices.	Public and Private	This policy benefits all community members and developers but could burden specific racial communities if they are not included in promoted partnerships.	A	This policy approaches supporting anti-displacement policy by promoting public and private partnerships that would expand the City's resource base and pool housing solutions. This policy only approaches supporting anti-displacement policy because it is repetitive of other policies in the Housing Element. Repeating policy narratives reduces the opportunity to address a wider range of City housing equity concerns and solutions.  <i>Recommendation</i>	New Policy (To replace H5): Adopt incentives, strategies, actions, and regulations that increase the supply of housing for households with extremely low-, very low- and low-incomes by private or public developers.	Expanded policy language with specific income levels and actions to make the policy more actionable.	Increase affordable housing production.
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				<p>: This policy is similar to H20. To reduce repetitive policy language in the next Comprehensive Plan periodic update, this policy can be replaced to include more actionable, anti-displacement prescriptive language.</p>			
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H6 Consider regulations that would allow cottage housing in residential areas, and revise the Development Code to allow and create standards for a wider variety of housing types.	Cottage Housing	This policy benefits all community members and developers.	A	<p>Allowing cottage housing in residential areas may provide more affordable housing options for low-income households. However, creating standards for a wider variety of housing types seems non-related and secondary to cottage housing.</p> <p><i>Recommendation</i> : This policy could be split into two different policies (from where the comma separates “areas,” from “and”). The second policy should be specific to what type of housing types the City</p>	Policy Revision (H6): Adopt regulations that would allow cottage housing in all residential areas.	The second section of the policy has been removed to make the intent of the policy clearer. Additional policies have been recommended to encourage new regulations that support diverse housing types (see H1).	Increase affordable housing production.
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				should pursue (i.e., missing middle housing).			
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H7 Create meaningful incentives to facilitate development of affordable housing in both residential and commercial zones, including consideration of exemptions from certain development standards in instances where strict application would make incentives infeasible.	Affordable Housing Incentives	This policy benefits community members who will have more access to affordable housing options, and for developers who will be able to gain affordable housing incentives through development standard exemptions. This policy may burden existing neighborhoods if new development is exempted from development standards that protect existing neighborhoods.	A	Zoning and regulations can restrict the types of homes built in a community. Minimum lot size requirements, prohibitions on multi-family units, and building height limitations are just some examples of regulatory restrictions. Research has connected zoning to racial segregation, creating disparities in housing outcomes. Amending zoning standards to allow more housing types and expand affordable housing choices is an important planning tool to	New Policy (In addition to H7): Explore establishing a development exemption review process that examines proposed exemptions for potential harms to communities already being disproportionately impacted. New Policy (In addition to H7): Use measures to track implementation and performance to ensure policies are working as intended to address racially disparate outcomes, exclusion, displacement, and	New policies create a procedure for cities to review and monitor housing policies, and specifically development standard exemption considerations when affordable housing developers would like to utilize an established/promoted City housing incentive.	Increase affordable housing production.
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				undo past harm. <i>Recommendation</i> : To make this policy more supportive of anti-displacement housing policies, the City could consider drafting a new policy that ensures exempted development standards are not protecting disproportionately impacted communities from housing exclusion and displacement.	displacement risk.		
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H8 Explore a variety and combination of incentives to encourage market rate and non-profit developers to build more units with deeper levels of affordability.	Affordable Housing Incentives	This policy could burden extremely low, very low, or low income households. Affordability to specific household incomes is not specified.	C	This policy challenges supporting anti-displacement policy because the language is broad and unclear. The term “deeper levels of affordability” does not define what affordability is or whose housing units are affordable. This policy may challenge City efforts to provide units that meet the needs of low-income households. If this policy is implemented without regard to other housing needs (i.e., non-single-family residences), this policy may serve as a barrier to	Revised Policy (H8): Explore a variety and combination of incentives and mandates to encourage market rate and non-profit developers to build housing units that serve the diverse income needs of the City. New Policy (In addition to H8): Adopt incentives, strategies, actions, and regulations that reduce barriers and promote access to affordable homeownership for extremely low, very low, low-income, and moderate	Several recommended policy revisions include the terms, "extremely low-, very low- and low-incomes". This policy uses the phrase "diverse income needs" to also include new housing considerations for moderate- and above-income households, as those families will also need long term housing options. The new policy also compliments revisions to H8 by reducing homeownership barriers to affordable housing units.	Increase affordable housing production.
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				<p>meeting these needs.</p> <p><i>Recommendation</i> : This policy could be revised to include language such as “low income” and specific AMI brackets. This policy should also specify what types of units would be encouraged through City sponsored development incentives.</p>	<p>income households.</p>		
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H9 Explore the feasibility of creating a City housing trust fund for development of low income housing.	Funding	This policy benefits all community members and developers, if taxes that increase risk of displacement are not required to create the trust fund.	A	This policy approaches supporting anti-displacement policy because housing trust funds help generate revenue for affordable housing production and preservation, thus increasing affordable housing options and availability for community members at higher risk of displacement in the City. However, the phrase "explore the feasibility" can promote the narrative that this policy is not urgent or does not need to be prioritized. <i>Recommendation</i> : Remove	Revised Policy (H9): Create an Affordable Housing Trust Fund for development of low income housing.	Changed "explore the feasibility" to "create an affordable housing trust fund" to make the intent of the policy more clear and actionable.	Increase affordable housing production.
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				"explore" and replace with "create" to make the policy more actionable.			
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H10 Explore all available options for financing affordable housing, including private foundations and federal, state, and local programs, and assist local organizations with obtaining funding when appropriate.	Funding	This policy could burden the City for there are many actionable elements of the policy that may make it more difficult to measure its implementation success.	A	Incentives, strategies, actions, and regulations that finance affordable housing are essential for maintaining long term affordable housing options. However, the verbiage “when appropriate” indicates that these actions are not a City priority or that consulting local organizations is not always an “appropriate” action. This policy approaches supporting anti-displacement policies because the verbiage may be exclusionary of the local community. Due to historic and	Revised Policy (H10): Explore all available options for financing affordable housing and assist and partner with local organizations to obtain funding.	Removed "including private foundations and federal, state, and local programs" and "when appropriate" to decrease repetitive language and make the intent of the policy clearer.	Increase affordable housing production.
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				<p>present mistrust of government, BIPOC communities more commonly seek assistance through familiar social groups and cultural institutions. Gaining more active participation of the local community is key in reducing racially disparate impacts. In addition, this policy is similar to H27 and H28. Funding policies should have separate intents to cover more diverse housing goals and actions.</p> <p><i>Recommendation</i> : The City could consider including policy</p>			
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				language that specifically encourages collaboration with local organizations, because these organizations are more likely to have more clear definitions of housing needs in their community groups.			
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H11 Encourage affordable housing availability in all neighborhoods throughout the city, particularly in proximity to transit, employment, and/or educational opportunities.	Amenity Access	This policy does not inherently burden existing communities, but it could be strengthened to promote more benefits to communities through equitable affordable housing development.	A	<p>This policy approaches supporting anti-displacement policy by encouraging new affordable housing development in neighborhoods with proximity to transit, employment, and/or educational opportunities. However, this policy repeats verbiage found in H32. Anti-displacement policies should have well-rounded verbiage that considers all components of equitable and desirable neighborhoods.</p> <p><i>Recommendation</i> : As discussed in</p>	<p>New Policy (To replace H11): Create and sustain affordable housing that provides equitable access to parks and open space, safe pedestrian and bicycle networks, clean air, soil and water, healthy foods, high-quality education, affordable and high-quality transit options and jobs.</p>	<p>This new policy includes encouraging affordable development near transit, employment, and education, but also specifies the need for other important elements of an equitable and healthy neighborhood; parks and open space, safe pedestrian and bicycle networks, healthy foods, and clean air, soil, and water. The new policy strengthens the intent of H11.</p>	<p>Ensure the benefits of investment and development are equitably distributed.</p>
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				Appendix E and Chapter 3: Patterns, new development can increase the risk of displacement and exclusion by reducing available green space, open spaces, and parks. These desired neighborhood elements could be included in housing policy to ensure new development is consistently preserving shared outdoor spaces that residents rely on for health and wellness.			
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H12 Encourage that any affordable housing funded in the city with public funds remains affordable for the longest possible term, with a minimum of 50 years.	Affordable Housing Incentives	This policy benefits households at higher risk of displacement and homelessness.	S	This policy is supportive of anti-displacement policy by requiring a minimum affordability term of 50 years (as required by the State). The City also has a number of other affordable housing methods. For example, a ground lease of City-owned property is available for subject affordable housing projects. The City can require the affordability requirement to be longer term in specific project agreements.			Increase affordable housing production.
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H13 Consider revising the Property Tax Exemption (PTE) incentive to include an affordability requirement in areas of Shoreline where it is not currently required, and incorporate tiered levels so that a smaller percentage of units would be required if they were affordable to lower income households.	Affordable Housing Incentives	This policy benefits low income households and developers that receive 8, 12, or 20 year tax exemptions on affordable unit development.	A	This policy supports increasing affordable housing covenants throughout the City, providing additional affordable housing accessibility to low-income households. The policy also promotes a tiered implementation approach to encourage MFTE in Subarea Plans and other future impacted areas of the City to mitigate impacts from major development projects (i.e, Light Rail). However, this policy only approaches supporting anti-	Revised Policy (H13): Revise the Property Tax Exemption (PTE) incentive to include an affordability requirement in areas of Shoreline where it is not currently required, and incorporate tiered levels so that a smaller percentage of units would be required if they were affordable to lower income households.	Removed "consider" to make the policy more actionable. Property Tax Exemption Programs are not available in most areas of the city. As discussed in Appendix C, the Hillwood and Echo Lake neighborhoods currently do not have apartments under a Property Tax Exemption program. In addition, there are several multi-family developments outside the upcoming station areas that are interested in the MFTE program but can not register because they are not eligible based on the program's current requirements.	Increase affordable housing production.
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				<p>displacement policy by using the term "consider". "Consider" implies that the City may not complete this action. If the action does not take place then affordable housing covenants will continue to be restricted to certain neighborhoods, excluding other neighborhood populations from their benefits.</p> <p><i>Recommendation</i> : To make this policy more actionable, the City should remove the term "consider".</p>			
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H14 Provide updated information to residents on affordable housing opportunities and first-time home ownership programs.	Community Engagement	This policy benefits the public by ensuring they receive continuous education for available housing resources. This policy may burden those who are not considered "residents" or who are not connected to traditional City outreach methods.	A	Establishing public outreach and education programs for available housing programs will help community members utilize resources available to them. This policy only approaches supporting anti-displacement policy by not providing clear actions to deliver updated information to residents. How will information be distributed? How has the community received and responded to information distributed through traditional outreach methods in the past? Who has	Revised Policy (H14): Establish partnerships with cultural institutions, faith groups, neighborhood organizations, community centers, and other community resources to inform residents on affordable housing opportunities and first-time home ownership programs.	Changed "provide updated information" to "Establish partnerships with cultural institutions, neighborhood organizations, community centers, and other community resources" to make the policy more actionable.	Begin to undo racially disparate impacts, exclusion and displacement.
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				<p>reported that they have not received notification of affordable housing opportunities in the past?</p> <p><i>Recommendation</i> : Establishing public outreach methods that reach the most people can be challenging for cities. The City could consider partnering with cultural institutions, neighborhood organizations, and community centers to reach more residents that could benefit from affordable housing resources, and those who have been excluded</p>			
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				from resources in the past.			
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H15 Identify and promote use of surplus public and quasi-publicly owned land for housing affordable to low- and moderate-income households.	New Development	This policy benefits community members who rely on affordable housing and developers who are interested in affordable housing projects.	A	Land disposition policies support the conversion of underutilized and surplus public land for other uses, guided by state law. State law has identified affordable housing as a public benefit and allows cities to sell or lease land at a reduced cost, or donate it altogether, for development of affordable housing. This policy supports increasing affordable housing production. <i>Recommendation</i> : Add language to clarify first steps before lands are promoted by the City.	Revised Policy (H12): Identify, inventory, and promote use of surplus public and quasi-publicly owned land for housing affordable to low- and moderate-income households.	Although the existing policy language of H15 supports anti-displacement policy, this policy can be improved by adding the term "inventory". It will be important for the City to create an inventory of surplus land feasible for affordable housing development. A regularly updated inventory will keep the City informed of development opportunities, and create a shareable marketing tool to educate developers on buildable lands in Shoreline.	Increase affordable housing production.
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H16 Educate the public about community benefits of affordable housing in order to promote acceptance of local proposals.	Community Engagement	This policy benefits the City in implementing required actions and changes to pursue affordable housing, and community members who desire to provide input on proposed housing developments in the City.	A	Available resources are not always shared or made easily available to community members. A lack of knowledge about fair housing is common and a need for education is strongly encouraged. Fair housing education is therefore supported by this policy. This policy helps support anti-displacement policies by initiating public education on the communal benefits of supporting affordable housing, reducing public opposition to	Revised Policy (H16): Educate the public about community benefits of affordable housing in order to promote acceptance of local proposals. Ensure that materials are sensitive to the unique cultures, values, and lived experiences of intended audiences to achieve participation and buy-off. Develop materials in requisite languages if necessary.	Some additional language to further describe how educational materials should be prepared has been included in the revised policy. Language and other cultural considerations strengthens the reach of this policy to more diverse groups.	Begin to undo racially disparate impacts, exclusion and displacement.
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				<p>affordable housing projects, and decreasing pre-development process timelines.</p> <p><i>Recommendation</i> : Add language to acknowledge and plan for interactions between different cultures and languages.</p>			
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H17 Advocate for regional and state initiatives to increase funding for housing affordability.	Funding	This policy benefits the City, the community, and developers.	A	<p>This policy is similar to H32. Repetitive language reduces the opportunity to have more actionable policy types and topics.</p> <p><i>Recommendation</i> : Additional policies for specific anti-displacement actions could replace H17. For example, this policy could be replaced with “Increase affordable housing options for all residents in areas that are within easy access to job centers or transit”.</p>	New Policy (To replace H17): Use local, regional, and national resources to generate more revenue for housing production and preservation, particularly for households with extremely low-, very low- and low-incomes.	Adjusted the reasoning for the policy and emphasized this by bringing the reasoning to the front of the policy.	Increase affordable housing production.
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H18 Consider mandating an affordability component in Light Rail Station Areas or other Transit-Oriented Communities.	Amenity Access	This policy benefits existing neighborhoods in proximity to the proposed Light Rail Stations.	A	Remove word “consider”. This REA and Public Engagement Summary (see Appendix E) has revealed data and community vetted higher risks of displacement associated with construction of the two proposed Light Rail Stations. This policy approaches supporting anti-displacement policy by suggesting an affordable housing mandate but does not encourage it by using the word “consider”. To make this policy more actionable, the word “consider” should be	Revised Policy (H-18): Mandate a housing affordability and transit subsidy component in Light Rail Station Areas or other Transit - Oriented Communities to mitigate higher risks of displacement. New Policy (In addition to H-18): Adopt zoning that incentivizes new development more equitably across all neighborhoods to prevent disproportionately burdening BIPOC households.	Removed the caveat (the “consider” statement), because it promotes disinvestment and conflicts with the intent of the policy. Consideration for including a "transit subsidy" component will also aid in the protection of existing communities by offering cost burdened households incentives to live near and utilize the transit system. The new policy provides distinction between housing challenges faced between different neighborhoods. In some neighborhoods the low cost of land and proximity to amenities could lead to displacement. In others, because land	Protect Existing Communities and Households.
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				<p>removed.</p> <p><i>Recommendation</i> : In addition, revised zoning regulations and incentives for affordable housing and green space preservation could be included in the affordable housing mandates, to prevent burdening BIPOC households near the proposed Light Rail Stations.</p>		<p>is “well utilized” and not underused they are not impacted by development.</p>	
<p>H19 Encourage, assist, and support non-profit agencies that construct, manage, and provide services for affordable housing and homelessness</p>	<p>Public and Private</p>	<p>This policy benefits households at higher risk of displacement and homelessness.</p>	<p>S</p>	<p>Public and private efforts can help to preserve existing affordable housing inventory and allow residents to stay in housing they can afford. Renters, who are</p>			<p>Protect Existing Communities and Households.</p>



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programs within the city.				primarily BIPOC, can benefit from this policy.			
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H20 Pursue public-private partnerships to preserve existing affordable housing stock and develop additional units.	Public and Private	This policy benefits extremely low, very low, and low income households.	A	Public and private efforts can help to preserve existing affordable housing inventory and allow residents to stay in housing they can afford. Renters, who are primarily BIPOC in the community, can benefit from this policy. This policy approaches supporting anti-economic and physical displacement policies by pursuing existing affordable housing preservation and developing additional affordable units. However, this policy is similar to housing policies H31 and	New Policy (To replace H20): Dedicate resources to preserve existing housing for low-income households including addressing problems of substandard housing and expiring affordable housing covenants.	Preserving affordable housing stock and developing additional units is already supported by other policy recommendations in this evaluation. Specific examples of actions and tools that reduce displacement risk strengthens the implementation of this policy.	Preserve existing affordable housing.
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				<p>H32 and could be expanded to provide additional, specific anti-displacement actions.</p> <p><i>Recommendation</i> : Add specific action language of affordable housing preservation, such as “adopt incentives, strategies, actions and regulations”. The City could also consider adding the term “affordable” for additional unit development. For example, “.. and development of additional affordable units”. Expiring affordable housing covenants can</p>			
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				decrease affordable units available. It is important to consider the continuation of creating additional affordable units alongside market rate units.			
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H21 Initiate and encourage equitable and inclusive community involvement that fosters civic pride and positive neighborhood image.	Community Engagement	This policy burdens historically excluded and segregated racial groups from Shoreline neighborhoods.	C	The term “civic pride” has historically related to how a community promotes or defends communal identity and autonomy. As discussed in Chapter 1: History, some Shoreline neighborhoods have historically enforced racially exclusive covenants to prohibit BIPOC communities from buying homes. This was often done with the intention to retain White communal identity and autonomy. Terms such as “civic pride” therefore can perpetuate	New Policy (to replace H21): Initiate and encourage equitable and inclusive community involvement, especially with communities disproportionately impacted by housing challenges. Engage communities in developing, implementing, and monitoring policies that reduce and undo harm to these communities. Prioritize the needs and solutions expressed by these disproportionately impacted communities for implementation.	Acknowledged that underinvestment in existing neighborhood engagement also needs to be addressed.	Begin to undo racially disparate impacts, exclusion and displacement.
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				<p>exclusionary and racially disparate housing policies. “Positive neighborhood image” is also unspecific and can be misinterpreted as coded language that communicates exclusionary messages. While the pride of a community may be important, it should be recognized that the GMA does not support the idea that neighborhoods should remain unchanged over time. Neighborhoods should evolve and change to adapt to the changing needs of residents. Community</p>			
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				<p>equity and wellness should be prioritized in housing policies instead.</p> <p><i>Recommendation</i> : This policy is challenging the City’s anti-displacement policy efforts. “Civic pride” and “positive neighborhood image” should be removed. The City could consider revising this policy to include historically excluded racial groups in community involvement. For example, “.. community involvement that encourages participation of all community racial groups”.</p>			
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H22 Continue to provide financial assistance to low-income residents for maintaining or repairing health and safety features of their homes through a housing rehabilitation program.	Older Adults and Special Needs	This policy benefits older adults and households reliant on a fixed or limited income.	S	This policy supports anti-displacement policies by emphasizing the importance of providing financial assistance to low-income households and supporting long term residency. However, as discussed in Appendix E, some community members feel disconnected from housing resources, and may not be informed of their existence. This indicates that setting up these programs is not enough to ensure their success. Additional outreach and educational			Begin to undo racially disparate impacts, exclusion and displacement.
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				programs should be established to ensure residents are informed of their community's resources and can utilize them before they are displaced from their homes. The new policy recommended for H21 and the revised policy recommendation for H14 includes language to support creating new outreach programs that reach more community groups, and specifically previously excluded groups.			
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H23 Assure that site, landscaping, building, and design regulations create effective transitions between different land uses and densities.	Design Standards	This policy benefits all community members and developers, if landscaping, building, and design regulations continue neighborhood character and do not contribute to gentrification of the community.	A	As discussed in Appendix E, some engagement participants felt that new multi-family housing and large apartment complexes sometimes do not provide landscaping and design standards that are harmonious with the intended character and aesthetics of Shoreline neighborhoods. Community members have shared that important community values such as green space, tree preservation, and communal spaces are not being included in new housing	Revised Policy (H23): Assure that site, landscaping, building, and design regulations create effective transitions between different building forms, land uses, and densities. New Policy (In addition to H23): <i>Create and sustain affordable housing that provides equitable access to parks and open space, aesthetic quality, safe pedestrian and bicycle networks, clean air, soil and water, healthy foods, high-quality education,</i>	Strengthen outcomes of Policy H23 by adopting a complimentary new policy that emphasizes desired and equitable neighborhood qualities when adopting land use and density transition regulations. Specified that "building forms" should be considered in conjunction with land uses and densities. Development of missing middle housing in existing neighborhoods will require additional review of transitions between homes to reduce displacement risk.	Ensure the benefits of investment and development are equitably distributed.
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				<p>developments. This policy approaches supporting anti-displacement policies by assuring that landscaping and design regulations are creating transitions between different land uses, such as multifamily and single-family households. But the policy does not specify how that assurance is made.</p> <p><i>Recommendation</i> : Clear guidelines should be implemented to avoid unintentional displacement. Criteria that are desired in residential areas should also be</p>	<p><i>affordable and high-quality transit options and jobs.</i></p>		
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				specified to avoid displacement and exclusionary impacts of new development adjacent to existing neighborhoods.			
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H24 Explore the feasibility of implementing alternative neighborhood design concepts into the City's regulations.	Housing Diversity	This policy benefits all community members and developers, if neighborhood design concepts continue neighborhood character and do not contribute to gentrification of the community.	C	This policy is broad and unclear. Alternative neighborhood design does not signify to the reader what types of neighborhood designs are intended, and where those neighborhood designs would be implemented. This policy challenges anti-displacement policy by not specifying the intent of the alternative neighborhood design. Vague narratives can continue a disparate distribution of benefits and burdens in the community when new housing is	New Policy (To replace H24): Adopt incentives, strategies, actions and regulations that encourage equitable development through the delivery of a wide-range of housing types and at multiple price points to mitigate displacement city-wide.	Replaced previous policy to describe the intent of the original policy more accurately and to encourage increasing City affordable housing production.	Increase affordable housing production.
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				built. <i>Recommendation</i> : Replace policy with language capturing the City's intent of allowing a wide-range of housing types in Shoreline neighborhoods.			
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H25 Encourage, assist, and support social and health service organizations that offer housing programs for targeted populations.	Public and Private	This policy could burden specific racial groups if encouraged and assisted programs are meant for those in "targeted" populations, and not for those in a specific racial group.	C	This policy language is repetitive of Policy H31. Terminology and verbiage impacts the policy narrative and furthers harmful biases about groups of people and communities. This policy challenges implementing anti-displacement policies by using the word "targeted" to describe populations that would utilize housing programs. "Targeted" is unclear in its meaning, and could be implemented as an unintentional exclusionary	Revised Policy (H25): Encourage, assist, and support social and health service organizations that offer housing programs for households in need, particularly for households with extremely low-, very low- and low-incomes. New Policy (In addition to H25): Adopt an ordinance to require developers, public funds, or a combination of the two to provide relocation funds for displaced tenants at or below 50% of	Removed the vague term (the "targeted" statement), because it promotes exclusion and conflicts with the intent of the policy. Acknowledged that housing programs should be invested in particularly for households with extremely low-, very low- and low-incomes. The new policy captures the wider range of assistance distributed for residents that may have experienced displacement from condemnation, redevelopment, environmental contamination, or city- initiated code enforcement.	Ensure the benefits of investment and development are equitably distributed.
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				practice. <i>Recommendation</i> : Replace “targeted” with a state legislative term, “low, very low, extremely low, and moderate- income housing” or “BIPOC communities”.	the county median income.		
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H26 Support development of emergency, transitional, and permanent supportive housing with appropriate services for people with special needs, such as those fleeing domestic violence, throughout the city and region.	Older Adults and Special Needs	This policy benefits community members experiencing economic, physical, or cultural displacement pressures.	A	As discussed in Appendix E, community members that have experienced homelessness in the past shared that they remain vulnerable to homelessness in the present due to economic displacement risk factors. While temporary emergency housing is important for persons experiencing homelessness, providing long term housing and services is vital to lowering rates of repeated or long-term homelessness. Services may not just be financial and employment based, but can	Revised Policy (H26): Support development of emergency, transitional, and permanent supportive housing with services for people with special needs, such as those fleeing domestic violence or households experiencing displacement, throughout the city and region. New Policy (In addition to H26): Strive to increase class, race and age integration across the city by equitably dispersing affordable housing opportunities. Discourage neighborhood segregation and	Added "households experiencing displacement" to distribute the benefits of the policy more equitably. The new policy focuses on specific anti-exclusion and anti-displacement solutions tailored to the needs of the community and supports allowing residents to stay in their homes as much as possible	Ensure the benefits of investment and development are equitably distributed.
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				<p>also be emotional or pertain to any other number of services. This policy is supportive of investments in low, very low, extremely low, and moderate-income housing, tenant protections, and equitable community planning. However, this policy does not provide clear descriptions of the criteria that is desired in housing services for people with special needs, and therefore approaches meeting the intent of anti-displacement policies.</p> <p><i>Recommendation</i></p>	<p>the isolation of special need populations.</p>		
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				<p>: Provide clear description of criteria that is desired in services for people with special needs.</p>			
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H27 Support opportunities for older adults and people with disabilities to remain in the community as their housing needs change, by encouraging universal design or retrofitting homes for lifetime use.	Older Adults and Special Needs	This policy benefits older adults and households reliant on a fixed income.	A	Does universal design hold the same benefits as pre-approved building plans? As discussed in Appendix E, seniors have indicated that tax increase protections and long-term and quality affordable housing options are leading components to maintaining residency in Shoreline. This policy is approaching supporting anti-displacement policies by supporting older adults through home rehabilitation programs and encouraging permit streamlining, but	New Policy (In addition to H27): Improve strategies and regulations that protect housing stability for renter households by establishing tax deferral education programs, rental assistance, and tenant opportunity to purchase programs.	Additional policy to compliment intent of H27. The new policy includes specific, actionable tenant protection programs identified as needed by the community. The policy now focuses on solutions tailored to the needs of the community and supports allowing residents to stay in their homes as long as possible.	Protect Existing Communities and Households.
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				<p>does not include actions that directly respond to specific housing issues vetted by the community.</p> <p><i>Recommendation</i> : Additional policy could be developed to compliment H27 and include tax increase protection programs and construction incentives of long-term affordable housing.</p>			
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H28 Improve coordination among the County and other jurisdictions, housing and service providers, and funders to identify, promote, and implement local and regional strategies that increase housing opportunities.	Cross-Jurisdictional Support	This policy benefits the City by pooling resources and strategies from multiple organizations and jurisdictions that effect housing outcomes. This policy may burden the community if community members are not given the opportunity to provide input.	A	Cross jurisdictional coordination allows jurisdictions of similar sizes and needs to pool resources, share solutions, and address shared issues. Partnering cities and counties can also share a representative to advocate for funding and grant opportunities at the state level. This policy is supportive of City investment in low, very low, extremely low, and moderate-income housing and equitable development initiatives. However, the policy is repeating policy	Revised Policy (H28): Improve coordination among landowners, developers, and housing and service providers to inform the City of current barriers to permitting affordable housing, and specifically long term affordable housing options.	Policy H30 encourages regional collaboration and solutions. Changed “County and other jurisdictions” to “landowners, developers” to remove repetitive policy language and to consider the perspectives of local development participants.	Begin to undo racially disparate impacts, exclusion and displacement.
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				<p>language in H30. Repetitive language reduces opportunities to diversify policy action that covers more housing needs. This policy is therefore approaching meeting housing needs.</p> <p><i>Recommendation</i> : Coordination with the County and neighboring jurisdictions (i.e., City of Seattle) is repetitive of Policy H30. Policy H28 could focus on coordination amongst landowners, developers, and housing and service providers to inform the City of current barriers to permitting affordable</p>			
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				housing, and specifically long term affordable housing options.			
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H29 Support the development of public and private, short-term and long term housing and services for Shoreline's population of people who are homeless.	Public and Private	This policy benefits community members at higher risk of displacement, members that are currently displaced, and members that are currently experiencing homelessness.	A	As discussed in Appendix E, community members that have experienced homelessness in the past shared that they remain vulnerable to homelessness in the present due to economic displacement risk factors. While temporary emergency housing is important for persons experiencing homelessness, providing long term housing and services is vital to lowering rates of repeated or long-term homelessness. This policy is supportive of investments in low, very low,	Revised Policy (H29): Support the development of public and private, short-term, and long term housing and services for Shoreline's population of people who are homeless. Consider donating vacant and underutilized public parcels for the creation of housing and services for homelessness.	The revised policy provides language that can be implemented in conjunction with H15 and H12 (see Table 4.1).	Increase affordable housing production.
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				extremely low, and moderate-income housing, tenant protections, and equitable community planning.			
H30 Collaborate with King and Snohomish Counties, other neighboring jurisdictions, and the King County Housing Authority and Housing Development Consortium to assess housing needs, create affordable housing opportunities,	Cross-Jurisdictional Support	This policy benefits the City by pooling resources and strategies from multiple organizations and jurisdictions that effect housing outcomes. This policy may burden the community if community members are not given the opportunity to	S	Cross jurisdictional coordination allows jurisdictions of similar sizes and with similar needs to pool resources, share solutions, and address shared issues. Partnering cities and counties can also share a representative to advocate for funding and			Increase affordable housing production.



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and coordinate funding.		provide input on who is addressing housing needs and whom is given housing solutions.		grant opportunities at the state level. This policy is supportive of City investment in low, very low, extremely low, and moderate-income housing and equitable development initiatives.			
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H31 Partner with private and not-for-profit developers, social and health service agencies, funding institutions, and all levels of government to identify and address regional housing needs.	Public and Private	This policy benefits the City by pooling resources and strategies from multiple organizations and jurisdictions that effect housing outcomes. This policy may burden the community if community members are not given the opportunity to provide input on who is addressing housing needs and whom is given housing solutions.	A	Public and private efforts can help to preserve existing affordable housing inventory and allow residents to stay in housing they can afford. Renters, who are primarily BIPOC, will benefit from this policy. However, this policy is only approaching the support of anti-displacement policy by emphasizing regional level needs. Individual cities have specific housing needs and challenges. While understanding the region's housing challenges and solutions is an	Revised Policy (H31): Partner with private and not-for-profit developers, social and health service agencies, funding institutions, and all levels of government to identify and address local and regional housing needs. New Policy (In addition to H31): Initiate and encourage equitable and inclusive community involvement, especially with communities disproportionately impacted by housing challenges. Engage communities in developing, implementing,	Changed "regional housing needs" to "local and regional housing needs" to emphasize the importance of collaborative partnerships addressing specific local housing issues, as well as regional housing needs. Local housing needs are likely to have more specific challenges and solutions than examining housing actions through a broader regional lens.	Begin to undo racially disparate impacts, exclusion and displacement.
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				<p>important piece of the puzzle, emphasis on addressing local housing needs should be included in the Housing Element. <i>Recommendation</i> : Housing Policy H32 is similar to H31 in the emphasis of regional level collaboration. H31 should be revised to include local housing needs as well.</p>	<p>and monitoring policies that reduce and undo harm to these communities. Prioritize the needs and solutions expressed by these disproportionately impacted communities for implementation.</p>		
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H32 Work to increase the availability of public and private resources on a regional level for affordable housing and prevention of homelessness, including factors related to cost-burdened households, like availability of transit, food, health services, employment, and education.	Public and Private	This policy benefits community members at higher risk of displacement, members that are currently displaced, and members that are currently experiencing homelessness.	A	Public and private efforts can help to preserve existing affordable housing inventory and allow residents to stay in housing they can afford. Hispanic or Latino renters, who are primarily cost burdened in Shoreline, can benefit from this policy.	Revised Policy (H32): Work to increase the availability of public and private resources on a regional level for affordable housing and prevention of homelessness, including factors related to cost-burdened households, like availability of transit, food, health services, employment, job training, and education. Work with partner agencies and neighboring jurisdictions to pursue funding for the collaborative development of impactful programs and strategies.	The new policy strengthens H32 by clarifying support for increasing the ability of all residents to live in the neighborhood of their choice. Providing resources for affordable housing and prevention of homelessness is important, but it does not specifically address anti-displacement policy. The new policy supports establishing amenities and partnerships that encourage a resident's ability to live in different city neighborhoods.	Ensure the benefits of investment and development are equitably distributed.
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H33 Support and encourage legislation at the county, state, and federal levels that would promote the City's housing goals and policies.	Cross-Jurisdictional Support	This policy benefits all community members and developers.	A	Supporting legislation at the county, state, and federal level can help the City implement housing goals and policies. However, this policy only approaches helping establish anti-displacement policies. Housing goals and policies could be written to prioritize new development, permit streamlining, or single family residences. There is no specific emphasis or consideration for anti-displacement or exclusion measures in this policy.  <i>Recommendation</i>	Revised Policy (H33): Promote the City's housing goals and anti-displacement policies by supporting legislation at the county, state, and federal levels.	Adjusted the reasoning for the policy and emphasized this by bringing the reasoning to the front of the policy. Removed "encourage" as it seemed duplicative of "support". Changed "policies" to "anti-displacement policies" to make intent of the policy more clear and actionable.	Begin to undo racially disparate impacts, exclusion and displacement.
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				: Add “anti-displacement policies” to “housing goals and policies”, so that it will read as “the City’s housing goals and anti-displacement policies”.			
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