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Background of Seattle's Policies on Equity, with emphasis on relation to parks

City of Seattle Race & Social Justice Initiative

2001-2007

Even before Greg Nickels became the Mayor of Seattle in 2002, he discussed the need for the city to address racial injustice. In 2004, the mayor launched the Race and Social Justice Initiative (RSJI), under the auspices of the Office of Civil Rights. Seattle's RSJI is widely recognized as the first formalized anti-racism effort by a city in the nation.

Focused primarily on internal processes, in 2004 RSJI sought to:

- Create a community where residents and employees experience our cultural and ethnic diversity as an asset;
- Eliminate institutional attitudes, practices, and policies that result in racial disproportionality; and
- Understand the challenges that cultural pluralism places on democracy and transform our civic and citizen engagement processes to address those challenges.

RSJI was fully operationalized for the first time in 2005 as a mayoral initiative. Every department created annual work plans and established internal "Change Teams" that held the departments accountable to the work plans.

From the departmental work plans, five citywide "Central Concerns" were established: workforce equity, economic equity, immigrant and refugee services, public engagement, and staff capacity building. The mayor assigned specific departments to lead on each Central Concern, with interdepartmental teams to coordinate the efforts for the Central Concern.

A Citywide Core Team of 40 people, representing most departments, worked with the Change Teams, department managers, and line staff to assist in implementing RSJI. The Core Team was trained on institutional racism, group facilitations, problem solving, and strategic planning.

Major policy direction and the overall effort of the Core Team, Change Teams, and departments' annual work plans were overseen by a RSJI-specific subcabinet of the Mayor's Office, including department directors and representatives of the Mayor's senior staff.

2008-2012

In April 2008, Mayor Nickels issued Executive Order 05-08 on Inclusive Outreach and Public Engagement, committing all departments to develop and implement outreach and public engagement processes inclusive of people of diverse races cultures, gender identities, sexual orientations, and socio-economic status.

In December 2008, the Seattle Office of Civil Rights published an assessment of the first three years of implementing RSJI and action plan for the next three-years.¹ This assessment found that the following had been accomplished:

- Overall Implementation
 - Department managers and Change Team members understood RSJI's broad goals and most were using consistent language.
 - Most, but not all, departments developed and implemented annual RSJI work plans.
 - The management structure of implementing the overall RSJI had been effectively implemented, with the Office of Civil Rights as the lead department and with other departments assuming leadership over their assigned Central Concerns, as well as the RSJI Subcabinet, Citywide Core Team, interdepartmental Central Concerns teams, and the department Change Teams.
 - Departmental managers participated in a four-segment training that included a one-hour introductory orientation; an eight-hour training using the PBS documentary, "Race: The Power of Illusion"; an eight-hour anti-racism curriculum; and a four-hour follow-up skills-based training. In addition, the Change Team and Citywide Core Team members participated in many of the same and additional trainings.
- Policy Changes
 - By executive order, a Translation and Interpretation Policy was created in 2007, with a new interdepartmental team to assist departments in implementation.
 - By executive order, a Outreach and Public Engagement Policy was created in March 2008, instructing departments to designate liaisons to coordinate and implement inclusive engagement strategies.
 - From 2003 to 2007, the City's percentage of contracting for non-construction goods and services with Women and Minority Business Enterprises (WMBEs) doubled from 5.3 to 11.4 percent.
- Changes within Departments
 - The Citywide Core Team created a new RSJI budget analysis tool for all departments when drafting budget and policy proposals to the mayor. This tool, which was updated in 2012, is now called the *Racial Equity Toolkit*,² and is considered a national model.³
 - The Department of Neighborhoods added a Race and Social Justice category to its Neighborhood Matching Grant program.

¹ City of Seattle Office of Civil Rights, *Race and Social Justice Report 2008: Looking Back, Moving Forward* (2008), <https://www.seattle.gov/Documents/Departments/RSJI/Jan20FINALRSJIrept.pdf>.

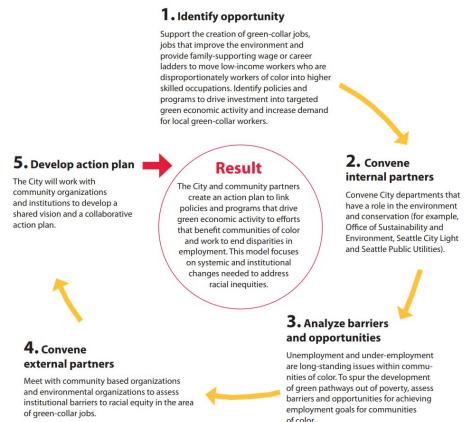
² Seattle Office of Civil Rights, *Racial Equity Toolkit* (Apr. 2012), http://www.seattle.gov/Documents/Departments/RSJI/RacialEquityToolkit_FINAL_August2012.pdf.

³ The Toolkit is highlighted by the Government Alliance on Race and Equity in its materials (http://racialequityalliance.org/wp-content/uploads/2015/02/GARE-Resource_Guide.pdf), and is used by the Minneapolis Parks & Recreation Board for their efforts.

- The Human Services Department revised its funding process to make it easier for smaller non-profit community organizations, with a focus on better serving communities with limited English fluency.
- Seattle Public Utilities created an Environmental Justice and Service Equity Division.
- The Office of Housing and the Human Services Department refocused the city's Ten-Year Plan to End Homelessness to acknowledge and focus on racial disproportionality in homelessness.
- Issues & Recommendations
 - Line staff lacked a full understanding of the purpose, goals, and focus of RSJI. Clearer goals and objectives needed to be set.
 - Not all departments were committed to supporting their Change Teams, and needed both to better resource their Change Teams and to be held accountable to implementing departmental annual work plans.
 - A greater emphasis was needed on the Central Concerns of public engagement and workforce equity, especially as the latter related to providing upward job mobility pathways and creating a positive workplace environment for people of diverse racial backgrounds.
 - The mayoral RSJI Subcabinet needed to be empowered as a "barrier buster" at the managerial level.
 - Departmental leadership needed to better understand how to best use the Citywide Core Team members' expertise in effectuating change within their departments.

In the *Race and Social Justice Report 2008*, the City set three goals for the following three years:

1. Ending racial disparities within the City as an organization.
2. Strengthening the way the City engages the community and provides services.
3. Addressing race-based disparities in our community.



Of special note to Goal 2 was improving outreach and public engagement. Specific actions to be undertaken included assigning a staff person in each department to serve as a liaison to coordinate public engagement activities as it related to RSJI, developing an Outreach and Public Engagement Toolkit for equitable outreach, and providing training on the use of the toolkit for all departments.

Goal 3 established a five-step approach toward addressing race-based disparities, including having the RSJI Subcabinet prioritize action in key impact areas, convening internal partners to identify and analyze potential barriers and opportunities, convening external partners of community members and key institutions to also assess the barriers and opportunities, and finally creating a

shared vision and action plan. The hoped-for result was a collaborative model in shared partnership with community partners that focused on systemic and institutional change.

In October 2009, pursuant to Executive Order 05-08 and the *Race and Social Justice Report 2008*, the Office of Civil Rights published the *Inclusive Outreach and Public Engagement Guide*.⁴

During 2009, the Office of Civil Rights also convened a Race and Social Justice Community Roundtable of community stakeholders to recommend a path forward for RSJI. In December 2009, following the recommendation of the Community Roundtable, the Seattle City Council unanimously adopted Resolution 31164 which affirmed RSJI's mission "to end institutionalized racism and social inequities in City government and to promote multiculturalism and full participation by all its residents."

The resolution institutionalized the Community Roundtable as the overseer of the city's RSJI efforts and directed the Office of Civil Rights to produce annual reports on the City's progress to achieve the RSJI goals and strategies, which the resolution set as to:

1. End racial and social disparities internal to the City by improving workforce equity, increasing City employee's RJSI knowledge and tools, and increasing contracting equity;
2. Strengthen the way the City engages its community and provides services by improving existing services using RSJI best practices and enhancing immigrants' and refugees' access to City Services; and
3. Eliminate race-based disparities in our communities.

Finally, Resolution 31164 directed departments to develop and implement annual work plans; implement racial equity tools in budget, program and policy decisions; review existing programs and policies; and continue supporting internal RSJI resources, including the departmental Change Teams.

In April 2010, Mayor Mike McGinn issued Executive Order 2010-05, requiring departments to develop outreach strategies to increase contracts with women and minority owned businesses.⁵

⁴ Seattle Office of Civil Rights, *Inclusive Outreach & Public Engagement Guide* (Oct. 2009), <https://www.seattle.gov/Documents/Departments/Neighborhoods/PPatch/Inclusive-Outreach-and-Public-Engagement-Guide.pdf>.

⁵ Seattle Mayor Mike McGinn, Executive Order 2010-05, <https://www.seattle.gov/Documents/Departments/FAS/PurchasingAndContracting/WMBE/ExecutiveOrder2010-05.pdf>.

In 2012, in addition to updating the *Inclusive Outreach & Public Education Guide* and *Racial Equity Toolkit*, the Office of Civil Rights conducted another three-year lookback assessment⁶ and three-year action plan.⁷

The 2009-2011 assessment identified successes as including:

- The inclusion of racial equity principles in the planning and implementation structure of citywide initiatives and policies, such as the Seattle Youth and Families Initiative, Seattle Jobs Plan, Engage Seattle, Walk-Bike-Ride, and Pedestrian Master Plan.
- The requirement by the City's Budget Office for departments to use the *Racial Equity Toolkit* to analyze every budget proposal, and the training of departmental managers to use the toolkit to review policies, programs and projects.
- The leadership of the RSJI Community Roundtable on addressing racial inequity in high school graduation rates.
- The Seattle Department of Neighborhoods' expanded outreach to historically underrepresented communities during a neighborhood planning process for Southeast Seattle.
- The Seattle Department of Transportation's development of social equity criteria to help prioritize transportation improvements.
- A revision by the Human Services Department to make its funding process for non-profit community agencies more accessible for smaller organizations, including agencies that serve immigrant / refugee communities.
- The Seattle Parks and Recreation Department's development of a training program for youth of color on lesbian, gay, bisexual, transgender, and queer (LGBTQ) issues.
- The Seattle Parks and Recreation Department's development of strategies to promote youth employment in the department, and expansion its docent program to better reflect the community.
- Monthly meetings by department representatives to coordinate the City's engagement strategies and share information from different neighborhoods, utilizing a train-the-trainer model and use of the *Inclusive Outreach and Public Engagement Guide*.
- A customization of the *Racial Equity Toolkit* by Seattle Public Utilities to match SPU's project management system.

⁶ Seattle Office of Civil Rights, Race and Social Justice Assessment, 2009-2011 (2012),
<https://www.seattle.gov/Documents/Departments/RSJI/RSJIAccomplishments2009-2011.pdf>.

⁷ Seattle Office of Civil Rights, Race and Social Justice Initiative: Three-Year Plan, 2012 - 2014 (2012),
<https://www.seattle.gov/Documents/Departments/RSJI/RacialEquityinSeattleReport2012-14.pdf>.

- The Department of Planning and Development working with communities of color to test and review the department's website design and content.
- In 2009, the Department of Neighborhoods working with three Neighborhood District Councils to develop ideas for greater connections with underrepresented groups, including review of bylaws, coffee chats, and alternative meeting venues and formats.
- The use of Public Outreach Liaisons (POLs) by the Department of Neighborhoods to engage underrepresented communities in civic processes, using bilingual and bicultural individuals to provide language interpretation at public meetings and work directly with immigrant and refugee communities
- Translation of documents, the City website, and Seattle Channel videos to more than thirty languages.
- Award of nearly \$5 million in funding for 200 Neighborhood Matching Fund projects serving underserved and immigrant and refugee communities, supporting cultural gatherings and cross-cultural learning. In supporting NMF applicants, project managers provided one-on-one technical assistance for communities of color, youth, and refugee and immigrant groups.

2012-2017

The *2012-2014 RSJI Plan* shifted the five Central Concerns of workforce equity, economic equity, immigrant and refugee services, public engagement, and staff capacity building to seven Equity Opportunity Areas of housing, jobs, education, health, criminal justice, community development, and environment. New interdepartmental teams were to be created for each opportunity area.

Three strategies were to be applied to achieve progress in the Equity Opportunity Areas:

1. Application of the *Racial Equity Tool* and *Inclusive Outreach & Public Education Guide* in city programs and projects.
2. Integration of racial equity into the foundation of Citywide policies and initiatives.
3. Partnerships and collaboration with community organizations and institutions, including adopting shared analyses, coordinated strategies, and consistent measurement of progress.

At the end of 2014, another three-year lookback assessment and three-year action plan was published by the Office of Civil Rights.⁸ In its assessment of the City's 2012-2014 RSJI efforts, the report found:

- City departments inconsistently used the *Racial Equity Toolkit* and staff struggled to understand how to apply the *Toolkit* to their work.

⁸ Seattle Office of Civil Rights, *Race & Social Justice Initiative: Vision & Strategy 2015-2017* (2014), <http://www.seattle.gov/Documents/Departments/RSJI/rsji-2015-2017-plan.pdf>.

- Individual departments posted their annual RSJI work plans online for the public to review, however, many of the department's action still lacked specific racial equity measures to ensure meaningful outcomes.⁹
- Despite departments providing better intentional outreach to underrepresented communities for their input on programs, many residents still felt their input was not valued.
- Community-based organizations often feel pitted against each other when applying for funding.

In comparison to the *2012-2014 RSJI Plan*, the 2012-2014 assessment lacked serious depth in analyzing progress on the City's three goals. For example, the *2012-2014 RSJI Plan*'s third goal focused on creating collaborative, shared partnerships with community organizations. But the assessment focused on educational efforts for training ethnic-based organizations on social justice issues and on information sharing with other cities regionally and nationally. These efforts were not the collaborative approach to project and policy development that was envisioned in the *2012-2014 RSJI Plan*. The assessment also did not track the City's progress for each of the seven Equity Opportunity Areas.

The *2015-2017 RSJI Plan* established three new strategies for the next three years:

1. Ensuring racial equity in City programs and services to make tangible differences in people's lives.
2. Working with community-based organizations to support the movement to end structural racism.
3. Helping lead regional and national networks for racial equity.

Each of the three strategies included several identified outcomes or actions, notably the following:

- Training all City boards, commissions and advisory groups on racial equity.
- Building public will for racial equity through partnerships and special projects to achieve structural change.
- Through the Mayor's Performance Plans with department Directors, requiring at least four uses of the *Racial Equity Toolkit* and use of the *Inclusive Outreach and Public Engagement Guide* on programs, projects and service changes.
- Annual reporting by departments on the use of the *Racial Equity Toolkit* and *Inclusive Outreach and Public Engagement Guide*.

⁹ The report also promised that the annual work plans would be posted to its new RSJI.org website in 2015, however as of 2017 none of the work plans or other progress tracking measures were available on the site.

- Strengthening interdepartmental Equity Teams for Education, Criminal Justice & Public Safety, and Equitable Development.
- Establishing a new RSJI Assessment Program to review all aspects of departments' work and City initiatives.

Also in 2014, Mayor Ed Murray issued Executive Order 2014-02,¹⁰ recommitting the City to the prior RSJI efforts. In addition to existing efforts, the executive order:

- Shifted from the previous seven Equity Opportunity Areas to nine Equity Areas of education, equitable development, criminal justice, jobs, housing, health, environment, service equity, and arts and culture, each which were to be addressed through collective action and policies.
- A new Campaign on Racial Equity to develop innovative programs and projects to engage community members and the general public on issues of education, equitable development, and criminal justice efforts, led by the Office of Civil Rights.
- An update of the *Racial Equity Toolkit* into a *Race and Social Justice Assessment Program*, to be developed and implemented by the Seattle Office of Civil Rights to review City initiatives and departmental programs, policies, practices, and community engagement efforts providing mechanisms for tracking progress over time.
- Increasing the leadership level of people participating in the Mayor's Office's RSJI Subcabinet to directors or their deputies will participate in the RSJI Subcabinet, led by the the Office of Civil Rights, with a focus on major Citywide innovations, partnerships, and overall implementation.
- Incorporation of RSJI components in department directors' annual accountability agreements with the mayor, in addition to the annual departmental RSJI work plans submitted to the Office of Civil Rights.
- Creation of a new Community Institute for Racial Equity, in partnership with community-based organizations, to provide ongoing education opportunities on race and social justice.

Following a race and social justice analysis of the Department of Neighborhoods' outreach strategies, in 2016 Mayor Murray issued Executive Order 2016-06,¹¹ redirecting the Department of Neighborhoods' staffing and resources from managing the Neighborhood District Council structure to a more intentional approach of community engagement and involvement. Notably, Executive Order 2016-06 required:

¹⁰ <http://murray.seattle.gov/wp-content/uploads/2014/04/RSJI-Executive-Order.pdf>.

¹¹ <http://murray.seattle.gov/wp-content/uploads/2016/07/Executive-Order-2016-06.pdf>.

- Every department to create public involvement plans and relocate departmental resources to:
 - Improve inclusive outreach and engagement strategies and plans.
 - Create more equitable representative systems reflective of the diversity of communities.
 - Build community capacity for meaningful participation, especially from underserved and underrepresented communities, and provide a wider range of opportunities for people to obtain information and get involved in decision-making processes.
 - Effectively and efficiently use community members' time.
- The Department of Neighborhoods, Seattle Office for Civil Rights, and City Budget Office to develop a proposed city council resolution and ordinance to terminate the City's official ties to the District Councils and City Neighborhood Council and to establish a new inclusive community outreach and engagement framework, including a new Community Involvement Commission.

Following Executive Order 2016-06, the Department of Neighborhoods drafted and the City Council adopted Ordinance No. 125192 (passed in April 2016), which officially shifted the department's focus on geographic neighborhoods towards inclusive engagement of all communities and which officially created the Community Involvement Commission.

In December 2017, Mayor Jenny Durkan recommitted to RSJI by issuing Executive Order 2017-13.¹² Executive Order 2017-13 established a new set of nine equity focus areas for 2018 of affordability, education, criminal justice, environmental justice, transportation equity, labor equity, women and minority business contracting equity, removing internal structural and institutional barriers for City employees; and arts and culture equity.

Executive Order 2017-13 also required the Office of Civil Rights and Human Resources Department to conduct an assessment of current RSJI efforts and recommendations report for needed improvement by March 8, 2018. In addition, department directors and Mayor's Office staff, including the mayor, were required to participate in an implicit bias training during 2018.

OSE Equity & Environment Initiative

The *2012-2014 RSJI Plan* and *2015-2017 RSJI Plan* identified the "environment" as a equity opportunity and focus area, and set a framework for an interdepartmental team on the issue.

¹² [http://www.seattle.gov/documents/departments/mayordurkan/Executive-Order-2017-13-\(Race-and-Social-Justice-Initiative\).pdf](http://www.seattle.gov/documents/departments/mayordurkan/Executive-Order-2017-13-(Race-and-Social-Justice-Initiative).pdf)

On Earth Day (April 22) of 2015, Mayor Ed Murray launched the Equity & Environment Initiative (EEI), as a partnership of the city, the community organizations, and private foundations to infuse the City of Seattle's environmental work with a race and social justice lens.¹³

Funding support for the effort came from, in part, the Bullitt Foundation, Seattle Foundation, Russell Family Foundation, Loom Foundation and Social Venture Partners. Their funding was matched by the Funders' Network for Smart Growth and Livable Communities. This funding helped support the addition of new program manager position housed within OSE.

The EEI was launched to advance three primary goals:

1. All people and communities benefit from Seattle's environmental progress.
2. Communities most impacted by environmental injustice are engaged in setting environmental priorities, designing strategies and tracking progress.
3. People of color, immigrants and refugees, people with low incomes, and limited-English proficiency individuals have opportunities to be part of and leaders in the mainstream environmental movement.

The effort included a Community Partners Steering Committee (CPSC) of 16 representatives from community-based organizations to establish guiding principles, design the initial strategy for inclusive decision-making, and shape the EEI workplan. None of the organizations were traditional environmental organizations, instead they include Got Green, OneAmerica, Puget Sound Sage, Duwamish River Cleanup Coalition, Rainier Beach Urban Farms, Latino Community Fund, Statewide Poverty Action Network, and others.

Over the next year, the CPSC engaged more than 800 people from communities of color, youth, low-income, immigrants, refugees, small businesses, faith, and limited English proficiency, as well as mainstream environmental organizations in order to develop an Equity & Environment Agenda (EEA).¹⁴

On Earth Day of 2016, Mayor Murray released the EEA. The EEA was centered on four key goals/priorities:

- Healthy Environments for All
- Jobs, Local Economies and Youth Pathways
- Equity in City Environmental Programs
- Environmental Narrative & Community Leadership

¹³ "Mayor Murray launches first-of-its-kind Equity & Environment Initiative," Mayor's Office, <http://murray.seattle.gov/mayor-murray-launches-first-of-its-kind-equity-environment-initiative/>

¹⁴ <http://murray.seattle.gov/mayor-murray-releases-groundbreaking-seattle-equity-environment-agenda/>

In the release of the EEA, Mayor Murray also committed to several early actions,¹⁵ including:

- Sending a resolution to City Council to adopt the four EEA goals as priorities for all departments and core beliefs of Seattle's approach to sustainability and the environment.
- Creating a Duwamish Valley program, to be coordinated by the Office of Sustainability & the Environment (OSE) and Office of Planning & Community Development (OPCD) to specifically improve environmental, health and socio-economic conditions in partnership with the community and other government agencies.
- Establishing an Environmental Justice Steering Committee, in partnership with the Department of Neighborhoods (DON) to build on DON leadership programs and support communities of color owning and shaping environmental issues.

In July 2016, the Seattle City Council adopted Resolution 31681, officially adopting the EEA's four goals, directing OSE to work with the Department of Neighborhoods to create a community-centric engagement strategy reflective of the EEA goals, and requiring a progress report to Seattle City Council every 18 months.

Within the EEA release on Earth Day 2016,¹⁶ the CPSC established four principles for the work to follow:

- Ensure the strategies are owned and driven by the community.
- Ensure communities most affected by environmental issues are highly involved throughout decision-making processes in meaningful and culturally appropriate ways.
- Establish strong accountability, transparent, accessible, and culturally appropriate solutions that include ongoing oversight of government and other entities to address the negative impacts that affected communities have experienced.
- Create solutions that recognize all places and people are interconnected and lead to collective liberation rather than causing benefits to some and harms to others.

The EEA also identified many strategies to advance each of the four EEA goals. A few notable strategies included:

- Developing a cumulative environmental impacts assessment to understand and address multiple environmental harms affecting communities, especially near industrial areas and interstate highways.

¹⁵ Mayor's Leadership Actions on Seattle Equity & Environment Initiative (Apr. 2016), <https://www.seattle.gov/Documents/Departments/OSE/MayorLeadershipActions.pdf>.

¹⁶ Seattle Community Partners Steering Committee, *Seattle Equity & Environment Agenda* (Apr. 2016), <http://www.seattle.gov/Documents/Departments/Environment/EnvironmentalEquity/SeattleEquityAgenda.pdf>.

- Requiring projects that have significant environmental impacts to complete the *Racial Equity Toolkit* in partnership with the community.
- Creatively and proactively addressing inequity in access to and quality of green spaces and culturally appropriate food.
- Ensuring City and mainstream organizations' environmental policies and programs directly invest in people, businesses, and communities of color and other EEI-priority populations.
- Creating career pathways for people of color to lead environmental policy and program work in government, businesses, and mainstream environmental organizations.
- Institutionalizing structures for community decision-making, transparency, leadership, and influence on design of environmental programs and policy.
- Designing City environmental policies and programs to simultaneously address multiple community issues, including economic and cultural benefits to EEI-priority populations.
- Supporting the growth and capacity of a stronger ecosystem of environmental justice leadership and collaboration between organizations.
- Connecting environmental programs to cultural anchors to increase community capacity and deliver environmental, social, and economic benefits.

OPCD Equitable Development Initiative

Creation of OPCD

In 2015, Mayor Murray issued Executive Order 2015-04 to establish the Office of Planning and Community Development (OPCD).¹⁷ This action effectively split the existing Department of Planning and Development into two, creating OPCD to work on long-term planning and a new Department of Construction and Inspections (SDCI) to focus on permitting. Relevant to this memorandum, OPCD was tasked with:

- Identifying opportunity areas and priorities in neighborhoods for capital investments, strategic partnerships, and addressing equity.
- Creating a new approach for promoting greater interdepartmental collaboration that aligns long-term planning with implementation strategies and capital investments.
- Working with agency partners and the private sector to achieve the City's broader objectives for race and social equity.

¹⁷ Seattle Mayor Ed Murray, Executive Order 2015-04, <http://murray.seattle.gov/wp-content/uploads/2015/06/Executive-Order-2015-041.pdf>.

Creation of Equitable Development Initiative and EDI Plan

The *2012-2014 RSJI Plan* identified “community development” and the *2015-2017 RSJI Plan* identified “equitable development” as an Equity Area, and the plans set a framework for an interdepartmental team on the issue. In addition, the *2015-2017 RSJI Plan* specifically called for special attention to be paid toward equitable development.

In 2014, the Department of Planning and Development (later OPCD) partnered with the Office of Civil Rights to create an Equitable Development Initiative Interdepartmental Team (EDI IDT), working with more than a dozen departments. This EDI IDT worked closely with OPCD’s Comprehensive Plan IDT, which was focused on a major update to the city’s document that governs the City’s land use, transportation, environmental, and many other policies and codes.

The two IDTs worked closely with one another, using the *Racial Equity Toolkit* on each element of the Comprehensive Plan to identify historical and structural inequities and equity opportunities. In addition, OPCD contracted PolicyLink, a national equity-focused think tank organization, to facilitate community workshops and research national best practices.

OPCD sought the input from the leadership of communities of color and other historically marginalized communities in Seattle in putting together the race and social equity vision, goals, and policies of the Comprehensive Plan. The result was a community-sourced set of strategies throughout the Comprehensive Plan to improve race and social justice outcomes, which were included as an addendum called the *Equitable Development Implementation Plan (EDI Plan)*, published in 2016 as part of City Council’s adoption of the Comprehensive Plan update.¹⁸

The *EDI Plan* included six parts: (1) a general overview of how race and social justice were incorporated into the Comprehensive Plan policies, (2) an equity analysis of how the Comprehensive Plan update’s growth strategy, (3) Equitable Development Framework, (4) systemic change strategies, (5) targeted mitigation strategies and identified equitable development projects for areas with a high risk of displacement, and (6) a Stewardship Plan for effective implementation.

In Part 1 of the *EDI Plan* highlighted the key race and social justice policies included within the Comprehensive Plan update:

- Parks Policy 1.1 - Continue to expand the City’s park holdings and open space opportunities, with special emphasis on serving urban centers and urban villages that are home to marginalized populations and areas that have been traditionally underserved.
- Parks Policy 2.10 - Develop partnerships with organizations that include race and social justice as fundamental to their operations and business practices.

¹⁸ City of Seattle, *Equitable Development Implementation Plan* (Apr. 2016), <https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/EquitableDevelopmentInitiative/EDIImpPlan042916final.pdf>.

- Growth Strategy Policy 2.2 - Develop and use practices to reach historically underrepresented communities and to aid their participation in decision-making processes.
- Growth Strategy Policy 3.10 - Use zoning and other planning tools to shape the amount and pace of growth in ways that will control displacement of marginalized populations, community services, and culturally relevant institutions and businesses.
- Growth Strategy Policy 3.6 - Plan for development in urban centers and urban villages in ways that will provide a broad cross-section of Seattle households, including marginalized populations, with better access to services, transit, and educational and employment opportunities.
- Housing Policy 5.6 - Increase housing choice and opportunity for extremely low- and very low-income households in part by funding rent/income-restricted housing throughout Seattle, especially in areas where it is less available and that include high frequency transit and other amenities, even if greater subsidies may be needed.
- Housing Policy 5.9 - Address the needs of marginalized populations and other communities vulnerable to displacement through policies and funding decisions related to rent/income-restricted housing.
- Neighborhood Planning Policy 1.1 - Prioritize neighborhood planning in areas expecting or experiencing significant change, primarily urban centers and urban villages, especially those that have not equitably benefitted from the city's growth.

Part 2 of the *EDI Plan* included an Equity Analysis, which quantified and mapped across the city the risk of displacement and level of opportunity. Included in the opportunity mapping was access to parks, calculated by how the crow flies, not by actual walking distance. This analysis helped inform where the EDI program and City as a whole should focus resources in the future.

Neighborhoods identified as having a high risk of displacement and low access to opportunity included Rainier Beach, Othello, Westwood-Highland Park, South Park, and Bitter Lake Village. The growth strategy of the Comprehensive Plan recommended in providing pathways to good jobs, quality education, support for housing affordability, and investment in cultural anchors to help the neighborhoods' residents prepare for market-rate growth and accompanying displacement pressure. Investments in cultural anchors could include an investment in a public park in a culturally sensitive manner, such as providing a gathering space specifically designed for the use of people of certain ethnicities or landscape design that fits a cultural background.

Neighborhoods identified as having a low risk of displacement and low access to opportunity included Aurora, Licton Springs, 130th & I-5, Morgan Junction, and Crown Hill. The growth strategy of the Comprehensive Plan recommended investing in public resources, such as parks, safer streets, libraries, and schools, to increase opportunities in these areas to better accommodate any growth in these areas.

The *EDI Plan*'s Equitable Development Framework (Part 3), in focusing on creating strong communities and people and creating great places with equitable access, establishes six Equity Drivers and Equity Outcomes. Among the Equity Drivers are:¹⁹

- **D2: Prevent Residential, Commercial and Community Displacement.** The ability for Seattle to remain an international city and one that is culturally, racially and economically diverse requires an anti-displacement commitment to those structures that are vital to communities: their homes, those businesses that provide culturally essential goods, services and jobs, and *those community anchors that provide support and strengthen cultural identity and preservation.*
- **D3: Build on Local Cultural Assets.** The ability for marginalized communities to thrive in place and for Seattle to continue to benefit from its identity as a cosmopolitan city requires that *marginalized 31 communities have the ability to shape their futures and that those assets that distinguish and strengthen them are strong and clearly identifiable. Community character, cultural identifiers, and values are important to respect and enhance.* Together they are essential components of an intact community.
- **D5: Develop Healthy and Safe Neighborhoods.** The ability for marginalized people and communities to thrive is dependent on their ability to live in healthy and safe neighborhoods where they can meet basic needs. *Create neighborhoods that enhance community health through access to public amenities (schools, economic opportunity, civic infrastructure, transportation, parks, open space, health care, and other services), affordable and culturally relevant food, and safe and healthy environments for everyone.*
- **D6: Equitable Access to All Neighborhoods.** Leverage private developments to fill gaps in amenities, expand the supply and variety of housing and employment choices, and create equitable access to neighborhoods with high access to opportunity.

Equity Outcomes were described for each Equity Driver. Equity Outcomes included:²⁰

- Target improvements to increase access to opportunity to ensure historically underserved communities can thrive in place, supportive of the complex structures of communities.
- Build upon local assets and resources of historically underserved communities to create more complete neighborhoods.
- Respect local community character, cultural diversity, and values.

¹⁹ Language is directly from the Equitable Development Implementation Plan. Italicized emphasis added.

²⁰ This is a synthesized selection of the Equity Outcomes.

- Support a network of cultural anchors that sustain community identity and that provide structure for community engagement and leadership.
- Support the development of strong community leaders, organizations, and coalitions that represent, serve, and are accountable to historically marginalized people.
- Through policies, programs, and investments, make culturally appropriate food available to historically marginalized communities in order to close racial disparities in cost and availability of basic foods.
- Invest in environmental mitigation and better regulate pollution to close racial disparities in health indicators.

Part 4 of the *EDI Plan* addressed actions for systemic change. The *EDI Plan* recognized that the plan itself was insufficient to effectuate change. Management structures, tools, coordination, commitment, and institutional change were needed, and the City departments plans, priorities, budgets, staffing, and capital investments needed to be aligned. With that in mind, the *EDI Plan* set forth four core actions:²¹

1. Establish clear criteria, based on data about existing disparities, to determine areas of the city where the City should pursue community development and planning initiatives.
2. Form new organizational structures across departments to establish shared goals, set priorities, and recommend shared investment strategies in targeted areas using the Equitable Development Framework, beginning with implementing Equitable Development Projects and Targeted Investments.
3. Ensure equity criteria are weighted heavily in department functional plans and Citywide investment decisions. The *Parks Legacy Plan* was specifically highlighted as a plan that should have equity criteria applied.
4. Establish an equitable development monitoring program to regularly report on community wellbeing and displacement risk.

Following these four actions, the Equitable Development Framework further detailed:

- OPCD would work with other departments to develop criteria for prioritizing planning and community development projects, heavily weighted toward improving equity and closing racial disparities. The *EDI Plan*'s Displacement Risk and Access to Opportunity indices and mapping were to shape project selection, planning processes, and implementation.

²¹ *EDI Plan*, page 34.

- A mayoral Capital Cabinet would be formed to guide long-term strategic planning, policy development, and major public investments, consistent with a vision for coordinated infrastructure to support growth and close racial disparities, and ensure public accountability.
- OPCD and Central Budget Office (CBO) would convene an Implementation Team for operational coordination meetings of departmental managers and division directors to select and implement of shared investment strategies. Proposed projects for selection and coordination would be analyzed using the *Racial Equity Toolkit*. In addition, City RSJI staff would be tasked with tailoring the *Racial Equity Toolkit* specifically for the task of improving a project at conception, developing a coordinated community engagement strategy, and mitigating the impacts of construction.
- Every element of the Comprehensive Plan must distribute resources equitably.²² To operationalized this requirement, all departments' annual work plans, strategic plans, and other important functional plans must include the *EDI Plan's* Equity Criteria as a key part of their implementation decision-making process, alongside department-specific and citywide priorities. The three key equity factors are priority populations, risk of displacement, and access to opportunity.
- OPCD would design a set of equitable development indicators to monitor displacement and community well-being.

Part 5 of the *EDI Plan* provided a list of targeted strategies and projects that the City would pursue. Citywide strategies included the Housing Affordability and Livability Agenda, Commercial Affordability Initiative, and Equity and Environment Agenda. Geographically specific strategies included: a Multicultural Community Center, the Rainier Beach Innovation District, and SouthEast Economic Opportunity Center in Southeast Seattle; the William Grose Center for Cultural Innovation in the Central Area; and the Little Saigon Landmark Project and the Equity TDR for Affordable Commercial Space Program in Chinatown / International District.

Part 6 of the *EDI Plan* established a Stewardship Plan to ensure effective implementation. The Stewardship Plan focused on the need for leadership, staff capacity, internal accountability, and external accountability.

Equitable Development Fund

Following the adoption of the Comprehensive Plan update, in the fall of 2016 the City collected \$16 million from a sale of the Civic Square property next to City Hall. These proceeds were used to establish an Equitable Development Implementation Fund. The EDI Fund was to be used for community capacity development, real estate development, and

²² Resolution 31577.

entrepreneurship and talent development within identified priority neighborhoods based on the equity mapping of displacement risk and opportunity access.

The Seattle City Council released an initial amount from the EDI Fund as an interfund loan of \$6.5 million to fund five projects listed in the *Equitable Development Financial Investment Strategy*,²³ which were also highlighted in the *EDI Plan*. The EDI program staff are funded through a city general fund allocation and a federal Community Development Block Grant.

To determine future projects to fund using the EDI Fund, an Equitable Development Advisory Board, comprised of leaders from low income-, race- and ethnic-focused organizations was established to set selection criteria. Using the project selection criteria, an interdepartmental team of department directors and managers will determine which projects get funded.

In the fall of 2017, the Seattle City Council authorized an interagency loan of the remaining amount of the \$16 million from the Civic Square sale, and dedicated \$5 million annually from a new tax on AirBnB rentals to the EDI Fund. For 2018, \$5.5 million was authorized for a second round of project selection from the EDI Funding. The application deadline for these projects was March 5, 2018, with project selection expected to be completed by May.

Parks Policies

General Citywide Requirements

Nearly every RSJI executive order and three-year plan has required all City of Seattle departments to conduct annual planning and assessments in order to embed equity into departments' work.

It's not clear how well the Seattle Parks & Recreation Department embedded the RSJI principles into its annual plans, especially during the beginning years of RSJI. In part this is probably due to a lack of focus by the city on parks as an equity issue. None of the RSJI executive orders or RSJI three-year plans specifically listed "parks" as one of their five to nine focus areas.²⁴

Parks Legacy Plan

In 2014, the Seattle Parks & Recreation Department developed, and the Seattle City Council approved, the Parks Legacy Plan.²⁵ The purpose of this plan was, in part, to inform the priorities of the revenue to be generated by the Metropolitan Park District, which was approved by ballot measure in August of 2014.

²³ Seattle Office of Planning & Community Development, *Equitable Development Financial Investment Strategy* (June 2016), <https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/EquitableDevelopmentInitiative/EquitableDevelopmentFinancialStrategy.pdf>.

²⁴ The 2012-14 RSJI Plan and the 2014 and 2017 executive orders did establish the "environment" as a focus area, and the 2014 and 2017 executive orders also added cultural assets, both of which could apply to the Parks Department.

²⁵ Seattle Parks and Recreation, *Parks Legacy Plan: Goals and Strategy* (Sept. 2014), <https://www.seattle.gov/Documents/Departments/ParksAndRecreation/PoliciesPlanning/PlanningParksLegacyPlan.pdf>.

The Parks Legacy Plan recognized that social justice was one of four priorities of the city Comprehensive Plan, outlined how input was sought from historically marginalized communities in putting together the plan, and how much communities of color use parks facilities.

However, the Parks Legacy Plan did not include access to parks by race, ethnicity, or nationality in determining how to prioritize investments. Instead, capital investments were to be prioritized by the following factors:

- addresses code and regulatory requirements
- addresses safety issues
- protects the building envelope
- promotes facility integrity
- reduces operating and maintenance costs
- results in water and energy savings
- results in other benefits to Parks facilities

Parks & Open Space Plan

The first direct mention of prioritizing equity in parks and open space within a general city policy document was in the 2016 Comprehensive Plan update and *EDI Plan*. Parks Policy 1.1 of the Comprehensive Plan required SPR to prioritize acquisition of new parks and open spaces within urban centers and villages home to historically marginalized communities.

In addition, Part 3 of the *EDI Plan* also required city capital investments to be targeted toward areas of low opportunity with larger populations with historically underserved communities. This requirement was further operationalized by requiring equity criteria to be weighted heavily in department functional plans and investment decisions — with parks specifically called out for emphasis. The equity criteria was supposed to include the *EDI Plan*'s indices and mapping for (1) priority populations, (2) displacement risk, and (3) opportunity access.

In 2017, the Seattle Parks & Recreation Department had its first opportunity to implement the 2016 Comprehensive Plan and *EDI Plan* requirements when it created the *2017 Parks and Open Space Plan (2017 POS Plan)*.²⁶ As described in the *2017 POS Plan*, it is “a 6-year plan that documents and describes SPR’s facilities and lands, looks at Seattle’s changing demographics, and lays out a vision for the future.” The *2017 POS Plan* aimed to implement the requirements of the Comprehensive Plan’s new Parks and Open Space Element and update the mapping and prioritization methodology behind its capital improvement plan.

Despite the intent of the *2017 POS Plan* to fulfill the Comprehensive Plan’s requirements, it’s not clear how the Comprehensive Plan’s and *EDI Plan*’s indices and mapping for priority populations, displacement risk, and opportunity access were included.

²⁶ City of Seattle, *2017 Parks and Open Space Plan* (Aug. 2017), <http://www.seattle.gov/Documents/Departments/ParksAndRecreation/PoliciesPlanning/2017Plan/2017ParksandOpenSpacePlanFinal.pdf>.

The 2017 POS Plan describes how capital projects are fall within four broad categories: major maintenance, ongoing programs, levy projects, and ADA projects.

Projects within the major maintenance budget, for which the main source of funding is the Metropolitan Park District, are determined through the Asset Management Plan, which is reviewed and updated every two years. Projects in Asset Management Plan are identified through ongoing condition assessments, consultant studies, 6-year facility plans, word order analyses, and intradepartmental word-of-mouth about maintenance issues. The projects are then ranked based on set scoring criteria, and the top projects are then included within the department's annual Capital Improvement Plan.

Based on City Council's Resolution 31203, SPR makes an initial priority ranking using the following three policies:

1. Preserve and maintain existing capital assets.
2. Support the goals of the City's plans, including the goals of the Comprehensive Plan.
3. Support economic development.

The Asset Management Plan then uses the following criteria to score the projects:

- Code Requirements: 100 points for whether the project brights a facility up to code or other legal requirements.
- Life Safety: 35 points for whether the project eliminates an imminent threat of injury.
- Facility Integrity: 30 points for whether the project extends the life of a facility.
- Operational Efficiency: 25 points for whether the project reduces operational or maintenance costs.
- Equity: 10 points if the project preserves or enhances an asset which serves a population with fewer options for alternatives.
- Other: 5 points if the project has a unique element that does not fit the other criteria for scoring.

The scoring method for equity seems to only address only one of the three equity factors from the *EDI Plan's* indices and mapping — opportunity access — but not priority populations or displacement risk. In addition, the equity methodology seemingly does not take a finer grain analysis to what constitutes adequate access to parks and recreation space for a neighborhood, such as by differentiating recreational types or programming. As 10 points of 205 total possible points, the equity criteria also does not seem to comport with the *EDI Plan's* requirement that the equity criteria be “weighted heavily” in the decision-making.

The *2017 POS Plan* does however provide several Gap Analysis “story maps” to show gaps in walkability to parks, equity and health concerns, income and poverty, and population density across the city.²⁷ The intent of the story maps is to inform SPR's Long-Term Acquisition Strategy toward achieving the goal of providing an interconnected, accessible parks and open space system.

²⁷ http://www.seattle.gov/ArcGIS/SMSeries_GapAnalysisUpdate2017/index.html.

With funding from the Metropolitan Park District, SPR has \$2 million annually through 2020 to acquire new properties, with the intent to purchase 13.5 acres between 2017 and 2023.

The Long-Term Acquisition Strategy divides prioritization for new park acreage into three categories: Urban Centers & Villages; Natural Areas and Greenbelts; and areas outside of urban centers and villages with historically marginalized populations. The *2017 POS Plan* does not make clear how the projects in the different categories will be evaluated against one another.

Within the Urban Centers & Villages category, which does not include the Center City, projects are evaluated based four factors: equity and health, income and poverty, density, and opportunity. These criteria are largely consistent with the *EDI Plan's* approach.

Within the Natural Areas and Greenbelts category, projects are largely judged based on natural resource value and the availability of funds and of the site. Equity is not considered.

For the category for areas outside of urban villages, projects are chosen based on whether the park or open space will serve a neighborhood home to historically marginalized populations, such as Georgetown and Aurora/Bitter Lake. Unlike the Urban Centers & Villages category where access to parks is evaluated on a 5-minute walk, access to parks outside of urban villages is evaluated on a 10-minute walk.

Major Challenge Fund

SPR has a Major Challenge Fund to award \$1.6 million each year to applications by CBOs for improvements to existing parks. Projects must be on SPR-owned property or facilities, and must identify a community need, demonstrated either by being an unfunded priority in the SPR capital improvement plan or by significant financial investments by multiple parties. Qualified projects are then scored based on X criteria:

- Percent match provided by other sources: 30 points
- Community Support: 20 points
- Located in an underserved/represented community: 30 points
- Restores or extends life of a park/facility: 10 points
- Community benefit provided: 20 points

The scoring for whether the project is located in an underserved or underrepresented community uses another numerical scoring based on SPR's "Equitable Prioritization Criteria," which accounts for the percent of the population under 18 years of age, percent of the population that is people of color, number of elementary school children receiving free or reduced lunch, number of residents living below the federal poverty level, childhood obesity rates, and the unemployment rate.

In total, the Equitable Prioritization Criteria/Score accounts for 25 percent of the overall scoring, which is significantly more than for the scoring under the Asset Management Plan. In addition, the community benefit criteria accounts for several factors, including whether the project reaches a diverse audience and demonstrates significant impact for the community served.

Outside Citywide

In 2017, the directors of OPCD, SPR, OSE, Seattle Department of Transportation, Seattle Public Utilities, and Department of Neighborhoods began a conversation about how the departments could better work together and with non-City partners to transform how the city plans, delivers, activates, and sustains Seattle's outdoor public spaces into an integrated network. This conversation led to an interdepartmental retreat in August with 42 staff and seven directors, representing twelve departments.

To bring their many ideas into focus, a new Outside Citywide Interdepartmental Team (Outside Citywide IDT) of 15 representatives of the core departments was formed. The result of this work will likely be an Outside Citywide framework that unifies a shared long-term vision and near-term action plan to best address racial equity, climate change, and growth & density, working collaboratively across departmental lines with new prioritization mapping, policy, and budgeting tools.

The Outside Citywide project does not yet have specific project delivery dates.

Other Jurisdictions

King County

King County's Equity and Social Justice (ESJ) initiative was launched by Executive Ron Sims in 2008 and later formalized when the King County Council adopted by ordinance in 2010.

Similar to Seattle, King County has utilized both a Equity Impact Review Tool (EIR) to analyze county programs, plans, and budgets,²⁸ and a Community Engagement Guide to assist in developing effective and inclusive outreach strategies.²⁹

According to a 2012 fact sheet, King County Department of Natural Resources & Parks (DNRP) used the EIR to invest in improving parks in underserved, low income, racially diverse communities.³⁰ DNRP has also used its EIR to shift its regional trails funding from trails in East King County to South King County.³¹

King County increased its commitment by establishing the Office of Equity and Social Justice in 2015. During this same period, King County also published a comprehensive assessment and mapping report of King County equity issues,³² and developed an online equity mapping tool.³³ King

²⁸ King County, *Equity Impact Review Tool* (Rev. Oct. 2010), <https://www.kingcounty.gov/~/media/elected/executive/equity-social-justice/documents/KingCountyEIRTool2010.ashx?la=en>.

²⁹ King County, *Community Engagement Guide* (May 2011), <https://www.kingcounty.gov/~/media/elected/executive/equity-social-justice/documents/CommunityEngagementGuideContinuum2011.ashx?la=en>.

³⁰ King County, "Using the Equity Impact Review Tool" (Feb. 2012), <https://www.kingcounty.gov/~/media/elected/executive/equity-social-justice/documents/KingCountyEIRToolExamples.ashx?la=en>.

³¹ Interview with Richard Gelb, King County DNR (Dec. 18, 2017).

³² King County, *The Determinants of Equity: Identifying Indicators to Establish a Baseline of Equity in King County* (Jan. 2015), <https://www.kingcounty.gov/elected/executive/~/media/4FF27039534048F9BC15B2A0FFDDE881.ashx>.

County also commissioned a report to research national best practices for community engagement models by local governments.³⁴

In 2016, King County published its *Equity and Social Justice Strategic Plan: 2016-2022 (ESJ Plan)*.³⁵ The *ESJ Plan* was structured in three main parts: Theory of Change, a Pro-Equity Policy Agenda, and Six Goal Areas.

The *ESJ Plan*'s Theory of Change included four strategies: (1) invest upstream & where needs are greatest, (2) invest in employees, (3) invest in community partnerships, and (4) Accountable & transparent leadership. The Pro-Equity Policy Agenda was divided into eight focus areas: child & youth development, economic development & jobs, environment & climate, health & human services, housing, information & technology, justice system, and transportation & mobility. The Six Goal Areas included: leadership, operations & services; plans, policies & budget; workplace & workforce; community partnerships, communication & education; and facility system improvements.

The 2014 assessment of community engagement strategies, 2015 creation of the Office of Equity & Social Justice, and the 2016 ESJ Plan are beginning to have a major impact on a transformation of how King County addresses equity and social justice issues.

- Every policy and program will be required to undergo an EIR, with departmental review and approval of the EIRs, and submitted to the Office of Equity & Social Justice for oversight and greater accountability.
- At each “project gate” of a project, the project manager will be required to track progress against the project’s EIR and community engagement plan.
- If a project is located in a census tract that meets an equity threshold, whether its percentage of people of color or ethnicity, health and environmental impacts, or other factor, the department will be required to dedicate extra resources to community engagement.
- New database and mapping tools that allow project managers to quickly find key equity data, nearby ongoing projects by other county departments, a list of stakeholders, and previous statements and concerns by stakeholders in the project area.
- A shift from in-language liaison programs in each department to a single interdepartmental, central pool of liaisons and community partners to conduct project outreach in-language and to identified communities. The intent is to contract/partner with community-based organizations to provide institutional support for these liaisons.

³³ King County Equity Score Online Mapping Tool, <http://kingcounty.maps.arcgis.com/apps/webappviewer/index.html?id=70a97e804e9b4991846cda2242985272>.

³⁴ Equity Matters, *Limited English Proficient Liaison and Marginalized Community Network: Best Practices and Feasibility Assessment* (Sept. 2014), report provided via email by Richard Gelb.

³⁵ King County, *Equity and Social Justice Strategic Plan: 2016-2022* (2016), <https://aqua.kingcounty.gov/dnrp/library/dnrp-directors-office/equity-social-justice/201609-ESJ-SP-FULL.pdf>.

Minneapolis

In 2011, the Community Outreach Department was created within the Minneapolis Parks & Recreation Board (MPRB) to better engage historically underserved communities. The outreach staff received and provided trainings on racial bias, cultural awareness, and how to assess racial impacts of policies and programming. In 2016, MPRB drafted a Racial Equity Action Plan. The Racial Equity Action Plan is an internal, near-term action document that's frequently updated.

In 2017, the MPRB established a new criteria centered on equity to determine how to prioritize capital and rehabilitation investments in neighborhood parks³⁶ and in regional parks and trails.³⁷

Under the system for neighborhood parks, projects are ranked based on the following criteria (23 total possible points):

- Community Characteristics
 - 5 points, Racially Concentrated Area of Poverty
 - 3 points, Neighborhood Population Density
 - 2 points, Youth Population of Neighborhood
 - 2 points, Neighborhood Crime Statistics
- Park Characteristics
 - 5 points, Park Asset Condition
 - 3 points, Age of Park Assets
 - 3 points, Proportion of Value³⁸

Under the system for regional parks, projects are ranked based on the following criteria (23 total possible points):

- Community Characteristics:
 - 5 points, Racially Concentrated Area of Poverty
 - 5 points, Park Access
 - 2 points, Neighborhood Safety
- Park Characteristics
 - 3 points, Historic Investment Per Acre
 - 2 points, Use Intensity
 - 2 points, ADA Compliance
 - 2 points, Natural Resources
 - 2 points, Trail Quality

Both of these Minneapolis rating systems weight priority populations and opportunity access (terms from Seattle's *EDI Plan*), significantly more than Seattle's Asset Management Plan rating

³⁶ Minneapolis Parks & Recreation Board, Ordinance 2016-223, https://minneapolisparksminn.iqm2.com/Citizens/Detail_LegiFile.aspx?ID=3151&highlightTerms=2016-223.

³⁷ Minneapolis Parks & Recreation Board, Ordinance 2017-101, https://www.minneapolisparks.org/_asset/8k9ny9/Regional-Parks-Ordinance-Chapter-18.pdf.

³⁸ "Proportion of Value" or "Proportionality of Investment" is calculated as the amount of capital invested since 2000 relative to the total cost to replace all existing park assets.

system in SPR's *POS Plan*. When access to parks is weighted at less than 5% of the total possible score in Seattle's rating system, the equity-related criteria in Minneapolis's rating systems account for as much as 65% of scoring.

Portland, Oregon

The Portland City Council adopted citywide racial equity goals and a vision in 2015. The Portland Parks & Recreation Bureau (PP&R) adopted a 5-Year Racial Equity Plan in 2017.³⁹ PP&R's 5-Year Racial Equity Plan set six goals/objectives:

1. Change existing services within the bureau using racial equity best practices.
2. End disparities in City government hiring and promotions.
3. Strengthen outreach and public engagement for communities of color and refugee and immigrant communities.
4. Increase access to culturally and linguistically responsive services for communities of color and refugee and immigrant communities.
5. Provide equitable access to City services to all residents.
6. Meet or exceed Citywide contracting goals for Minority Business Enterprises.

The plan has an extremely clear method for implementation and accountability. Each objective included a set of strategies, actions to fulfill the strategies, a performance measurement timeline, an identified evaluation tool, an identified lead staffer who's responsible for executing each strategy and accompanying actions, and an identified staffer who's responsible for championing the strategy and actions.

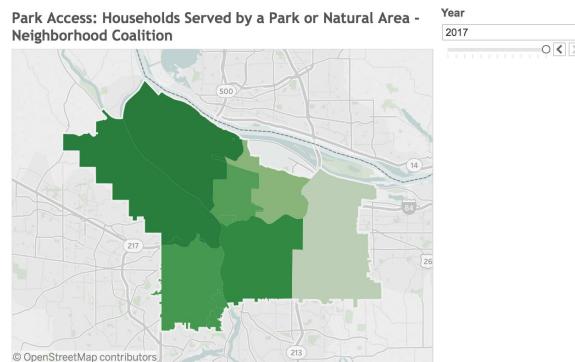
In addition to the plan, PP&R publishes a clear report on its website, tracking its progress to achieving its equity goals. As part of the department's annual performance report, PP&R publishes its year to year performance in achieving its equity goals to its website.⁴⁰ The website has dynamic maps to show progress in areas of the city by year.

Following the adoption of the 5-year plan, PP&R staff are now using a version of *Racial Equity Toolkit* developed specifically for Portland.

³⁹ Portland Parks & Recreation Bureau, *Five-Year Racial Equity Plan Furthering Citywide Racial Equity Goals and Strategies* (Sept. 2017), <https://www.portlandoregon.gov/parks/article/623289>.

⁴⁰ Portland Parks & Recreation Bureau, 2016 Performance Report: 4. Access & Equity, <https://www.portlandoregon.gov/parks/article/538615>.

Progress Toward Target	Performance Measure	2012	2013	2014	2015	2016	Target
↑ Minor Progress	Percentage of households within a .5 mile of a park or natural area	79%	80%	80%	80%	81%	100%
↑ Minor Progress	Percentage of households living within 3 miles of a full service community center	69%	70%	69%	69%	70%	100%
➡ No statistically significant change	Percentage of residents who rate neighborhood closeness to parks as good or very good	83%	85%	84%	84%	83%	85%
➡ No statistically significant change	Percentage of residents who visited a park at least once in the last year	88%	88%	88%	90%	89%	100%
↑ Progress made	Employees of color as a percentage of FTEs	15%	15%	16%	18%	20%	28%
↑ Progress made	Employees of color as a percentage of all employees	24%	27%	27%	28%	31%	28%
↓ Minor Decline	Female employees as a percentage of all FTEs	37%	35%	36%	38%	37%	50%
↓ Decline in progress	Female employees as a percentage of all employees	54%	54%	55%	56%	1.8%	50%
↓ Minor Decline	Park acres per 1,000 residents	19.5	19.5	19.4	19.4	19.1	19



In ranking projects to prioritize for its Capital Improvement Plan, PP&R uses twelve criteria for a total possible score of 125. With a total possible score of 15, equity accounts for 12 percent of the total possible score. The equity criteria is comprised of three variables, each worth 5 points each: percent of people of color; percent of students in free and reduced lunch; and percent of low income individuals.

San Francisco

The San Francisco Recreation & Parks Department (SFRPD)'s Strategic Plan: 2017-21 Update⁴¹ sets performance targets and assessments for equity based on designated "Equity Zones." The Equity Zones are determined based on whether 20% of the population in the area are "disadvantaged," a technical term defined by criteria in California state law.

SFRPD tracks progress within the Equity Zones versus outside the Equity Zones for many factors, including: park acreage per capita, percent of police incidents within 500' of the parks, park maintenance evaluation scores, percent of capital investment, recreation hours per capita and per acre, and percent of recreation resources.

The SFRPD Strategic Plan sets several objectives and initiatives, including the following relating to equity:

- Prioritize deferred maintenance renewals and discretionary capital resources in equity zone parks with failing park scores.
- Develop & implement an outreach plan that increases language access, registers more people from low-income neighborhoods & public housing, and increases inclusive & adaptive programming.
- Develop an annual list of operational and capital needs for our philanthropic community that prioritizes park access and equity.
- Establish a baseline to track the distribution of partnership projects in and outside equity zones.
- Increase volunteer support in equity zone parks.

⁴¹ San Francisco Recreation & Parks Department, *Strategic Plan: 2017-21 Update* (2014), <http://sfrecpark.org/wp-content/uploads/RPDStrategicPlan.pdf>.

- Pursue an equity-focused internal learning initiative to develop alignment with the Department’s equity goals, including implicit bias training.

In acquiring new public space, SFRPD utilizes a multi-factored Y/N approach, instead of a scoring or rating system, to determine whether a proposed open space or park meets the department’s priorities.⁴² Two of the nine factors to be considered are whether a proposed park space is in a “high need area” or an “open space deficit area,” which are corollaries to Seattle’s *EDI Plan* indices of priority populations and opportunity areas. SFRPD maps the “high need areas” based on whether the proposed park is located within a places of high population density, high percentage of children and/or seniors, and high percentage of households categorized as low income.

⁴² San Francisco Recreation Parks & Recreation Department, *Acquisition Policy* (Aug. 2011), <http://sfrecpark.org/wp-content/uploads/Acquisition%20Policy%202011.pdf>.

Comparison of Equity Impact Review Toolkits

Racial equity toolkits are used for analyzing and influencing decisions regarding departmental budgets, policies, programs, and projects to ensure inclusive outcomes and address the historical disproportionality of benefits and costs to community of color and other marginalized communities.

The City of Seattle was the first local government in the United States to create a toolkit, and as a result, it has become the standard for nearly all other local governments. This uniformity across the United States in large part due to the Local and Regional Government Alliance on Racial Equity (GARE), which highlights the City of Seattle's *Racial Equity Toolkit* in its own best practices guide.⁴³ However, King County created a different toolkit that does not follow the City of Seattle's approach as closely. First, in 2010, King County's toolkit used a simple three-stage approach toward reviewing equity impact of: (1) impact on the County's determinants of equity, (2) assessment of who is affected, and (3) opportunities for action.⁴⁴ In 2015, King County changed to a new tool, which it calls the *Equity Impact Review Process*.⁴⁵

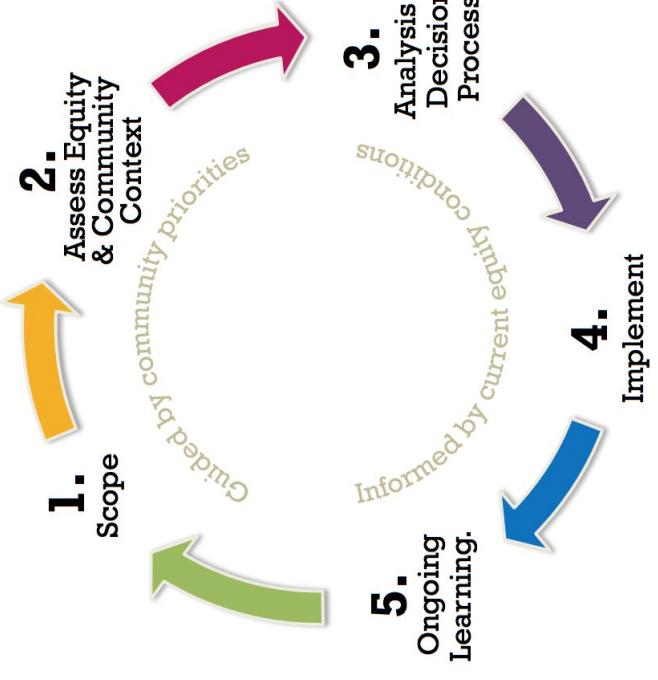
King County's new tool is meant to be more collaborative with community members, stakeholders, and employees. It also takes an alternatives analysis approach to assessing equity impacts, akin to how an environmental impact statement considers alternatives.

This section compares Seattle's and King County's approaches to toolkits. The comparison table also includes descriptions of how the GARE Toolkit is different than Seattle's *Racial Equity Toolkit*.

⁴³ Local and Regional Government Alliance on Race & Equity, *Racial Equity Toolkit: An Opportunity to Operationalize Equity* (Updated Dec. 2016), https://racialequityalliance.org/wp-content/uploads/2015/10/GARE-Racial_Equity_Toolkit.pdf; see also City of Portland Office of Equity and Human Rights, *Racial Equity Toolkit*, <https://www.portlandoregon.gov/oehr/article/592297> (Portland's toolkit has a seven-step evaluation process adapted from the GARE Toolkit).

⁴⁴ King County, *Equity Impact Review Tool* (Sept. 2010), <https://www.kingcounty.gov/~/media/elected/executive/equity-social-justice/documents/KingCountyEIRTool2010.ashx>.

⁴⁵ King County, *Equity Impact Review Process* (2015, updated March 2016), https://www.kingcounty.gov/~/media/elected/executive/equity-social-justice/2016/The_Equity_Impact_Review_checklist_Mar2016.ashx.

City of Seattle Racial Equity Toolkit	King County Equity Impact Review Process	
	 <p>The diagram illustrates the King County Equity Impact Review Process as a cyclical five-step cycle:</p> <ol style="list-style-type: none"> Step 1. Scope (Yellow arrow): Leadership communicates key community outcomes for racial equity to guide analysis. Step 2. Assess Equity & Community Context (Red arrow): Assess community priorities. Step 3. Analysis & Decision Process (Purple arrow): Analyze & Decision Process. Step 4. Implement (Blue arrow): Informed by current equity conditions. Step 5. Ongoing Learning (Green arrow): Guided by community priorities. <p>Feedback loops connect the end of each step back to the beginning of the next, and a large green arrow at the bottom indicates a continuous cycle.</p>	<p>1. Scope</p> <p>Leadership communicates key community outcomes for racial equity to guide analysis.</p> <p>2. Assess Equity & Community Context</p> <p>Gather information from community and staff on how the issue benefits or burdens the community in terms of racial equity.</p> <p>3. Analysis & Decision Process</p> <p>Analysis & Decision Process</p> <p>4. Implement</p> <p>Informed by current equity conditions</p> <p>5. Ongoing Learning</p> <p>Guided by community priorities</p> <p>1. Scope: Identify Who Will Be Affected</p> <p>Using demographic information, must define the people and places that the action/proposal will affect; determine to what extent/intensity the effects, impacts and outcomes the action will have on the people and places; determine how long the action will have an effect; identify the group of stakeholders and affected parties, including those who have historically not felt included or engaged, and determine their roles in decision-making.</p> <p>1. Set Outcomes</p> <p>Departmental leadership, including input from Change Teams, are to set the specific community outcomes for racial equity that the proposed policy, program, practice, or budget decision is hoped for. The Toolkit includes checkboxes to indicate whether the proposal falls into one of the city's seven Equity Opportunity Areas highlighted in the <i>2012-2014 RSJI Plan</i>. (toolkit has not been updated to reflect the nine equity areas highlighted in the <i>2015-2017 RSJI Plan</i> or Mayor Durkan's 2017 executive order.</p> <p>The GARE Toolkit adds that the proposal should first be defined (most policies, programs, practices, and budgets won't relate directly to racial equity), and that both (1) the intended end-conditions for the community and (2) the intended performance-based, measurable outcomes should be defined.</p>

<p>2. Involve Stakeholders + Analyze Data</p> <p>Must identify and describe geographic areas of potentially impacted by the proposal, the racial demographics of the area, how community members and stakeholders have been meaningfully engaged, the existing racial inequities in the area (based on the data and stakeholder conversations), and the potential root causes and other factors of racial inequities.</p> <p>The GARE Toolkit is different in that it does not focus on including community and stakeholder input within Step 2, but instead makes community engagement its own Step 3. In addition to the data points listed in Seattle's Toolkit, the GARE Toolkit also suggests identifying data gaps.</p>	<p>2. Assess Equity & Community Context</p> <p>Must engage community stakeholders to determine their priorities and concerns, describe which of the County's determinants of equity will be directly and indirectly affected by the intended outcomes of proposal/action, describe how the proposed course of action will affect known disparities (using quantitative data), and identify potential unintended equity-related outcomes of the action.</p>	<p>3. Analyze Decision & Process</p> <p>Must map out how the potential range of alternatives within the planned proposal/action might affect community and employee priorities and concerns; evaluate each alternative for who will be disproportionately burdened or benefit, both current and future populations; describe how will alternative actions would differ in improving or worsening current equity conditions; include potential upstream alternatives (and related costs) that target root causes to eliminate disproportionate impact; and prioritize alternatives by equitable outcomes and reconcile with functional and fiscal policy drivers.</p>	<p>This step is akin to the alternatives analysis of an Environmental Impact Statement.</p>
<p>3. Determine Benefit and/or Burden</p> <p>Must identify and describe how the proposal will increase or decrease racial equity, the potential unintended consequences of the proposal, the potential benefits, and whether the impacts are aligned with the department's community outcomes defined in Step 1.</p> <p>The GARE Toolkit adds determining whether there are complementary strategies that could be implemented, how existing partnerships could be strengthened to maximize impact in the community, and how the department will partner with stakeholders for long-term positive change.</p>	<p>4. Advance Opportunity or Minimize Harm</p> <p>Must identify and describe how the department will address the racial equity impacts, including unintended consequences; the strategies that will be employed to address immediate impacts; the strategies that will address the identified root causes of identified inequities; how partnerships will be established with stakeholders for long-term positive change; and, if impacts are not aligned with the department's desired community outcomes, how the department will realign its work.</p>	<p>4. Implement: Staying connected with communities and employees</p> <p>Must communicate with communities, stakeholders and employees identified based on earlier use of the County's Community Engagement Guide about how you will implement your action; engage with affected communities and employees to guide implementation; advance "pro-equity" opportunities when possible, such as in contracting, hiring, promotion, and materials sourcing; measure and evaluate the intended outcomes in collaboration with affected communities; determine whether there is sufficient monitoring and accountability systems to identify unintended consequences; and describe how course corrections will be made if unintended consequences are identified.</p>	<p>The GARE Toolkit includes this step as part of its step for determining benefits and burdens. Instead, the GARE Toolkit has a step focused on implementation, similar to the King County Toolkit.</p>

<p>5. Evaluate. Raise Racial Awareness. Be Accountable.</p> <p>Must identify and describe how the department will ensure the proposal will continue to be evaluated and the agency will be held accountable to the intended performance outcomes and community results. This should be identify the department's goal and timeline for eliminating racial inequity, how the evaluation will be reported, how internal and external stakeholders will be engaged, and how the department will raise awareness for the racial inequity related to the issue.</p> <p>The GARE Toolkit adds that the messages and communication strategies for how to advance racial equity should be identified and described.</p>	<p>5. Ongoing Learning</p> <p>Must evaluate whether the proposal/action appropriately responds to community priorities and concerns; learn with the community to adjust the action as their priorities and concerns shift; communicate progress to all stakeholders; and collect and include community feedback into future planning efforts.</p> <p>6. Report Back</p> <p>Must share analysis and report responses from Step 5 with department leadership and Change Team leads and members involved in Step 1.</p>
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Engagement Guides

Seattle *Inclusive Outreach & Public Engagement Guide*

Created in 2009, Seattle's *Inclusive Outreach & Public Engagement Guide* is the foundation for all department's outreach efforts.⁴⁶ The guide includes: Essential Strategies for Inclusive Engagement; a Quick Guide to the key elements of effective and inclusive engagement; an Inclusive Public Engagement Plan Worksheet; a Public Engagement Matrix to describe five types of engagement and corresponding tools and activities to achieve them; and an Evaluation Template.

Within the Essential Strategies for Inclusive Engagement section, the guide provides three principles: enhancing relationships and engagement; enriching knowledge gathering, and embracing organizational change. The section also describes the cultural competency ladder from high levels of competence to cultural destructiveness, as a way to demonstrate what types of public engagement activities are preferred. The section concludes with six strategies for inclusive engagement:

1. Building personal relationship with racial/ethnic community.
2. Developing alternative methods for engagement, such as allowing community members to provide feedback in photographic, video, or voice recorded formats.
3. Partnering with diverse organizations and agencies who already have cultural relationships to the identified communities.
4. Maintain a presence within the community.
5. Increase accessibility, such providing convenient times and places for meetings, food and incentives for attendance, and increasing power-sharing.
6. Creating a welcoming atmosphere that reflects, honors, and welcomes the community.

The Quick Guide section provides an outline of the key steps to inclusive public engagement and a brief "how to do it" description. The Quick Guide's steps include: defining the scope of work, defining roles, identifying stakeholders, incorporating racially and culturally appropriate engagement activities, creating an inclusive public engagement plan, establishing the staffing needs and structure for the public engagement, establishing a communications and outreach plan, and evaluating the process.

The Inclusive Public Engagement Plan Worksheet follows the outline of the Quick Guide, with pre-work and 12 questions/steps.

1. Before beginning, the inclusive engagement strategies and public engagement matrix are to be reviewed; Change Team members, Department of Neighborhoods staff, and other city staff are to be identified and consulted with; and data is to be collected to conduct the Racial Equity Toolkit.

⁴⁶ Seattle Office of Civil Rights, *Inclusive Outreach & Public Engagement Guide* (Oct. 2009), <https://www.seattle.gov/Documents/Departments/Neighborhoods/PPatch/Inclusive-Outreach-and-Public-Engagement-Guide.pdf>.

2. Scope of Work
 - Must describe the scope and goals of the process and whether the project impacts issues of racial disparity, institutional racism, multiculturalism, or awareness of other racial issues.
 - Must describe the timeline for the project and community engagement.
3. Define Roles
 - Describe the objectives of involving the public in the process, the public's perspective of the project, and the degree to which public influence is possible.
 - Describe the nature of the decision to be made in the process and who will make the decision.
4. Identify Stakeholders
 - Identify specific stakeholders from the general public racial/ethnic groups, nonprofit advocacy and service organizations, the private sector, decision-makers, city departments, other public agencies, and other people/groups directly affected by the outcome.
 - Identify the interests/concerns of stakeholders, including how they can benefit or be harmed, what changes they want and what they want left unchanged, their expectations, their resources, and what relationships they have with others.
5. Check-In #1
 - Project Lead must check-in with department leadership, communications staff, and other departmental staff for advice/approval of the initial assessment of scope, roles, and stakeholders.
6. Inclusive Engagement Plan
 - Describe what public involvement tools/activities are appropriate for the project.
7. Staffing & Organization
 - Determine whether an advisory group or community partnership is needed.
 - Describe the resources and staffing necessary to carrying out the public involvement activities, including staff responsibilities and roles, community responsibilities and roles, and funding needs for communications, events, and consultant services.
8. Communications & Timeline
 - Determine the basic communications strategy and goals, including the key messages for the project, the strategy for communicating with the media, and what the translation and interpretation needs of the project are.
 - Develop a timeline and month-by-month calendar of the public involvement schedule.
 - Determine and describe the necessary reporting mechanisms/products, including any media/communications pieces, progress reports, final reports, formal recommendations, briefings and presentations for decision-making bodies.
9. Check-In #2
 - Project Lead must check-in with departmental leadership and communications staff on proposed public involvement strategy/tools, resources needs and responsibilities, and coordination with other projects.

The Public Engagement Matrix section of the *Inclusive Outreach & Public Involvement Guide* describes four types of engagement: Inform, Consult, Collaborate, and Shared Decision-Making. Each engagement type is described with its associated tools, activities, and techniques associated. This matrix is to be used as a resources to determine what types of public engagement activities to include within a project's engagement plan, with a goal that agencies will choose engagement types that have a higher level of participation.

Finally, the Evaluation section of the *Inclusive Outreach & Public Involvement Guide* provides several criteria by which to judge whether an engagement plan sufficiently inclusive. The section recommends that identified community, staff, and other City stakeholders should be solicited to evaluate the public involvement efforts.

King County Community Engagement Guide

Adopted in 2011 and updated in 2015, King County's *Community Engagement Guide*⁴⁷ is a barebones document when compared with the City of Seattle's *Inclusive Outreach & Public Engagement Guide*. King County's guide has three basic steps: reviewing a Community Engagement Continuum matrix, completing a *Community Engagement Worksheet*, and sharing the completed worksheet with project team members and incorporating their feedback.

King County's Community Engagement Continuum is similar to Seattle's Public Engagement Matrix. The continuum describes the characteristics and strategies of five levels of engagement: County informs, County consults, County engages in dialogue, County and community work together, and community directs action. The purpose of the continuum is to encourage engagement strategies that are more inclusive of the community yet appropriate for the given project.

The *Community Engagement Worksheet*, which is a separate document from the *Community Engagement Guide*,⁴⁸ has seven steps.

- Purpose
 - Describe what community engagement will achieve for this project, what engagement level on the continuum is appropriate, and whether there is sufficient time to carry out the engagement properly.
- Stakeholders and Audiences
 - Identify who the key stakeholders and partners are and how they are affected by, involved in, or have a specific interest in the issue. Describe the steps that will be taken to ensure impacted communities that have not been historically included will be included in the engagement.
- Data Collection

⁴⁷ King County, *Community Engagement Guide: A tool to advance Equity & Social Justice in King County* (May 2011, updated in 2015), <https://www.kingcounty.gov/~/media/elected/executive/equity-social-justice/documents/CommunityEngagementGuideContinuum2011.ashx?la=en>.

⁴⁸ King County, *Community Engagement Worksheet* (May 2011).

- Gather the necessary background information about affected populations that public engagement is intended to reach, such as languages and dialects spoken, customs, historical or geographic data.
- Describe how all audiences will receive effective outreach, including language and literacy needs and potential use of alternative and non-traditional approaches to outreach such as new and social media.
- Barriers and Risk
 - Identify any potential trust issues among members of the public or community that may prevent full engagement, how cultural differences among affected communities will be addressed, whether there is public support for the project, and potential unintended consequences and risks if the outreach or project is not done effectively.
- Decision-making process and communications
 - If decisions are to be made by the community, describe how the engagement strategy fits those decisions at the right level and phases of the project and that the decisions are made by trusted representatives of the affected communities.
 - Describe how the community will be informed of the project's benchmarks and progress, providing opportunities for formal updates and recognizing the contributions of community members. Describe what steps will be taken to maintain opportunities for future collaboration or engagement.
- Evaluation
 - Describe how success of the project in terms of process and outcomes will be evaluated, including how community feedback will be reported and recognized.

King County's 2016-2022 *Equity & Social Justice Strategic Plan* calls on several actions which will shape the County departments' use of the *Community Engagement Guide*.⁴⁹

A core element to the County's *ESJ Plan* is to invest in community partnerships. A major initiative will be to create a central pool of in-language and in-community liaisons, rather than the existing factionalized approach toward using liaisons across departments. The County hopes many of these new liaisons will be within community-based organizations, especially organizations representing historically marginalized people. As a result, much of the engagement work will be able to move up the continuum ladder into shared partnerships between the county and community.

In addition, the County's *ESJ Plan* calls for new tools for better community engagement; providing planners, analysts, and project managers with new resources on demographic conditions; improving equity analysis tools; and moving away from iterative, project-based outreach toward ongoing engagement. One core feature of this will be to expand on the County's current online opportunity maps to develop maps and databases where project managers and outreach specialists can see all relevant equity data, other past and current projects, and past and current interests and concerns of stakeholders. This new tool may have a transformative effect of where the County can speak as one voice when multiple projects across multiple departments. In addition, project

⁴⁹ King County, *Equity and Social Justice Strategic Plan: 2016-2022* (2016), <https://aqua.kingcounty.gov/dnrp/library/dnrp-directors-office/equity-social-justice/201609-ESJ-SP-FULL.pdf>.

managers and outreach specialists will have much more fine-grained information about the places and people where their projects are located, and will be better able to adapt engagement strategies based on the context.

RSJI Implementation in Parks Capital Projects

SPR does not directly use the *Racial Equity Toolkit* when creating a community engagement plan for a capital project. To some extent, this makes sense as the framework and questions of the Racial Equity Toolkit are meant for higher level decision-making, such as long-range plans, policies and budgets.

Instead, the *Racial Equity Toolkit* was applied to the development of SPR's "Design Program" template. A Design Program is a document that outline the potential issues and proposed community engagement strategies for a specific capital planning project. The document includes the following elements:

- Design background, detailed project scope, budget sources, and background (location, landmark/historic designations, existing conditions).
- Design considerations, including key project requirements, project elements, ADA scoping, and permits & regulatory compliance.
- Project schedule.
- Public involvement plan, including demographics, outreach activities, and identified local partner organizations.
 - Demographic data includes the percentages of underserved populations, youth, students on free or reduced lunch, and below the poverty level.
- Required project reviews.
- Environmental checklist.

The creation of public involvement plans is also more informal than the use of the City's Inclusive Outreach & Public Involvement Guide. Instead of working through the worksheet each time, the planner and project managers discuss intended involvement plans with SPR's Senior Public Relations Specialist.

Capacity Assessment of SPR Staffing to Support CBOs

As stated in the 2014 *Parks Legacy Plan*, SPR lacks resources to meaningfully support community-based organizations in the capital planning necessary to acquire and maintain new parks and open space.

The relevant staff capacity within SPR to assist in delivering new capital projects include: one parks planner, three project managers for parks development, one neighborhood planner who works on the Neighborhood Matching Fund program, and one public relations specialist.

As described in the *Parks Legacy Plan*:

Currently, Capital Improvement Project funds staff the Planning and Development Division (PDD). There is little staff capacity for projects or issues not directly related to capital projects. Community-driven initiatives require PDD to “cobble together” staff required to address these requests. Recent staff reductions in Planning and Development include:

- 2011 – position reductions, saving \$310,000
- 2012 – eliminated several planning, administrative, and project management positions, saving \$737,000

Impacts from the lack of General Fund positions reduced [eliminated or severely restricted] staff capacity to:

- Work on citizen-initiated projects that do not have an associated capital project funding source
- Work with potential partners on design ideas to improve the park system
- Begin to address the backlog and increasing number of illegal encroachments on park property
- Fully participate in other City initiatives that may have impacts on park property
- Provide quick turnaround for other Parks divisions on small renovation, alteration, technical, or infrastructure projects that need some level of design expertise
- Provide technical expertise when natural disasters and other emergency situations occur
- Implement systematic changes for larger building or infrastructure conservation measures

During assessment interviews with both community-based organizations (CBOs) and SPR staff, many individuals expressed the problem that projects could get funded through a Neighborhood Matching Fund for early design work but frequently lacked the necessary project development staff and identified capital funding sources to carry the project into full design and implementation.

In addition, there was an expressed concern that SPR lacked sufficient staffing to assist CBOs in brainstorming and writing proposals for the Neighborhood Matching Fund, Your Voice Your Choice grant program, and other city grant programs. Once a project was selected, SPR lacked sufficient staffing to assist CBOs to develop the plans.

Larger CBOs, such as the Delridge Neighborhoods Development Association, Downtown Seattle Association, El Centro de la Raza, and Evergreen Mountain Bike Alliance, did not need always need this extra staffing support from SPR. However, smaller organizations, community groups, and individuals found the lack of support difficult for ideas to be taken to fruition.

An increase in staffing is necessary to support the project development of ideas and priorities from CBOs. It's critical that the individual be experienced in planning and managing capital parks projects — and not just be a community engagement specialist — to ensure projects are developed quickly, avoid potential design barriers, and are developed to be "shovel-ready."

This position(s) could be funded through a general fund allocation, Metropolitan Park District revenue, or through outside private foundation dollars.

Several existing high level positions are currently or have been funded using foundation dollars, including the Director of Office of Sustainability and Environment, the Duwamish Valley Program Advisor, and the Director of the Office of Policy & Innovation. This could be a model for hiring a project manager with capital development experience to assist CBOs develop parks and open space.

The Real Estate Excise Tax (REET) is not a likely revenue source for funding the capital planning of community-based organizations' acquisition or maintenance of new park space. REET revenue must be spent only on projects identified in the Capital Facilities Element of the City's Comprehensive Plan. Thus, it'd be impossible to fund — using REET — a position whose work is unprogrammed to specific park projects.

Recommendations

Staffing

Background

Community-based organizations which have goals for the public acquisition and development of a particular public space frequently face barriers in getting their property developed. One significant barrier is an understaffing and lack of budget allocation within SPR in order to assist the CBOs with project development.

As the *2014 Parks Legacy Plan* indicated, several positions were cut within SPR's Planning and Development division in 2011 and 2012 to save more than a \$1 million annually. This cut has significantly impacted the ability for SPR to support CBOs.

The remaining staff that work on planning and capital development are limited to allocating their time to the project budgets listed in their annual work plans, and the staff lack the budgetary freedom — and the time — to assist CBOs with their projects. This means projects not already in a capital improvement plan (CIP) will not receive staff attention, and it will be difficult for some projects to make it into a CIP.

In addition, SPR's Neighborhood Planner, who is the point person for managing SPR's involvement with DON's Neighborhood Matching Fund (NMF) and Your Voice Your Choice (YVYC) programs, lacks the time and bandwidth to conduct complete outreach to community groups with ideas for park acquisition, improvement or maintenance. NMF and YVYC grantees could also benefit from additional planning and design assistance in fully developing their projects to ensure they are funding- and shovel-ready.

Recommendation

- Create a new Capital Project Development Manager position within SPR's Planning and Development division, focused on supporting community-based organizations in the acquisition of lands and project development.
 - Position would include responsibilities of:
 - Project development assistance for organizations' priorities for the City to acquire and develop public space.
 - Designing organizations' priority public space or managing consultant design work for the development of the public space.
 - Assisting organizations in creating their own community engagement plans for the planning and design work of their priority public space, and providing resources, including meeting spaces, emails, postcards, posters, and contact lists, for the organizations to execute the community engagement plans.
 - Project development assistance for organizations' desire to maintain, steward, and activate SPR public spaces, including assisting in establishing maintenance plans and partnership agreements with SPR.
 - Assisting organizations in creating long-term funding plans for planning, designing, and acquiring public space, mapping out funding over multiple

cycles of DON Neighborhood Matching Fund grants, SPR Major Challenge Fund grants, council-approved capital improvement plan funding, and other sources.

- In coordination with SPR's Neighborhood Planner, monitoring and tracking NMF applications for public space acquisition and development, and providing technical assistance for projects,
- **Funding Source:** Position funded either by the City's General Fund, Metropolitan Parks District, or through outside foundation support.
- **Cost:** Estimated cost, including overhead: \$175,000 / year.

Additional Options

- Add a Strategic Advisor Position within SPR's Planning and Development division or a similar position within the SPR Superintendent's Office.
 - Either of these positions would provide a great degree of flexibility to the staff member to work with CBOs and to coordinate project development of CBOs' priority projects.
 - By placing the position in the Superintendent's Office, the position would be more able to align efforts to support CBO-priority projects with departmental objectives and other interdepartmental capital planning and investment efforts.
 - However, based on interviews with SPR and CBO staff, there is greater value to having an individual with strong experience in park-related capital planning and development who can take on more of the planning, design, and funding efforts necessary to realize CBO projects.
 - **Cost:** Estimated cost: \$175,000 / year.
- Hire three separate positions to support community-based organizations in acquiring and planning new public space, in developing maintenance management plans, and in supporting CBOs in applying and managing DON's NMF grants and SPR's Major Challenge Fund grants. (Estimated cost: \$500,000)
 - Planner or Capital Development Project Manager position to support CBOs.
 - Maintenance/Stewardship Agreement Manager to support CBOs.
 - Neighborhood Planner #2 to assist with NMF and YVYC grants programs.
- Add additional program budget that allows the existing SPR capital project managers and planner to allocate time to supporting CBOs. This would not increase capacity, but it would provide greater flexibility for SPR capital development and planning staff to work with CBOs.
 - **Funding Source:** Funding would likely need to come from other capital projects, reallocated to a budget line item for unspecified CBO projects.
 - **Cost:** Estimated cost: \$25,000 - \$150,000

Partnerships & Management Plans

Background

One of the least cost ways to ensure public space is well-managed and active is to rely on local community-based organizations to manage, steward, and activate public space. Local organizations are best situated and most committed to ensuring public space is well-used, reflects local community goals, values, and vision for the space. The public benefit is inherent in their efforts.

SPR has a large Partnerships & Enterprise Division that is tasked with entering into new partnerships and managing new partnerships with CBOs to maintain, steward, and activate public space. Despite this staffing, multiple organizations of all sizes expressed frustration in entering into partnerships and clearly defined management plans with SPR.

For example, one small organization that manages urban farms were not able to pursue new plots in Southeast Seattle because of a failure of City departments to efficiently coordinate with one another and establish priorities. Within an existing location where the same organization manages an urban farm, no partnership or management agreement is in place, creating significant uncertainty regarding roles and responsibilities.

For a large organization that manages thousands of volunteers to maintain public spaces in Seattle and the region, it took six years to get approval of a lease agreement through SPR and city council due to a debate over whether the organization provided sufficient community benefit.

During planning of new or improved parks, some organizations had expressed desire for creating and managing new aspects of park space, such as by installing and tending culturally-focused community gardens. But after the initial planning efforts, the conversations for CBO stewardship carried through the park design phase, resulting in lost opportunities.

By far the biggest issue is a lack of knowledge among CBOs that they can enter partnership agreements with SPR.

During 2017, the SPR Partnerships & Enterprises Division underwent an internal discussion to improve how well it enables CBOs to enter into partnerships. One result was the creation of a new, simple two-page partnership application that CBOs can complete in order to begin the process of entering into stewardship and activation agreements with SPR.⁵⁰

Recommendations

1. Commit to quick and efficient review of the new, simple partnership application process.
2. Ensure the new, simple partnership application process is successful by distributing the information more widely to potential CBO partners. Information about the simple application should be shared at community centers, on a blog post, in a departmental e-newsletter, by email to existing partners so they may share it with other CBOs, at parks

⁵⁰ Seattle Parks & Recreation Department, "Expression of Interest for Public Benefit Partnership Form," <https://www.seattle.gov/Documents/Departments/ParksAndRecreation/Business/ExpressionofInterest122118.pdf>.

project open houses and stakeholder meetings, and at interdepartmental open houses, such as the HALA Community Conversations.

3. The SPR Partnerships & Enterprises Division should provide a training for the SPR Planning & Development Division project managers, planners, and outreach specialists about potential partnership agreement possibilities and actively encourage the project managers and planners to work with stakeholder CBOs to identify potential partnership opportunities in new and improved parks.
4. In determining “community benefit” as part of entering into a stewardship or activation agreement with a CBO, SPR should consider any stewardship or activation to have an inherent community benefit.
5. Allow organizations such as the Seattle Parks Foundation, Downtown Seattle Association, Delridge Neighborhoods Development Association, and other similarly structured organizations that have strong partnerships with SPR to serve as a “fiscal agent” that has a Master Memorandum of Agreement to sub-manage MOAs with smaller CBOs.

Waive Liability Insurance Requirement

Background

Organizations that maintain, steward, or activate public space in Seattle, whether on SPR, SDOT, or SPU property, are required to carry general liability insurance. While many medium and large organizations can cover this cost, smaller organizations find this insurance to be a barrier to their plans for managing public spaces. Whether a CBO wants certain design elements in an SDOT Pavement to Parks Project or create a new community garden as part of an improved SPR park, the insurance requirement can get in the way of a local community group being able to steward or activate the space.

Recommendation

- For CBOs with partnership agreements, SPR and SDOT should cover the liability concerns through the City's insurance.

Alternative

- SPR and SDOT could provide the liability coverage to CBOs by requiring a enhanced community benefit to match the cost of providing the insurance.
- Seattle Parks Foundation and similar organizations could establish a clear program for CBOs to gain “fiscal” sponsorships with the sole purpose of gaining liability coverage.

CBO Parks Activation Programs

Background

Following a pilot project in 2015-15, SPR entered into a five-year contract for Downtown Seattle Association to manage the activation and Westlake Park and Occidental Square. In addition, similar three-year agreements were established for several other Downtown parks for 2016-2018.

Under the Westlake Park and Occidental Square agreement, Downtown Seattle Association (DSA) is responsible for programming and activating the space with staffing seven days per week, with security spot checks at night. DSA manages all the permitting, including collecting permit fees using the same fee structure as SPR, and DSA will also often pay vendors to be there. In exchange, the City provides DSA with \$500,000 per year for each park, and SPR is still responsible for park maintenance.

This program has been successful in dramatically improving the use and activation of the two parks. More people of all incomes are using the parks, and the parks are cleaner and safer than before.

DSA has proven that the parks can become high-demand locations. If SPR's policies allowed DSA to charge more for vendor permits, DSA would likely be able to do so. Before the program, almost no food truck or other vendor would pay to set-up in the park.

The Urban Parks Activation Partnership program extended the Westlake and Occidental model to Cascade Playground, Donnie Chin International Children's Park, Freeway Park, Hing Hay Park, Kobe Terrace Park, and Bell Street Park, each with an organization managing the work of an activation coordinator who programs the park space. The City provided \$46,000 for each park to the organizations managing the activation.

Based on interviews of CBO staff, the Urban Parks Activation Partnership program has been successful at bringing new people to the parks and making them feel safe and welcoming locations. The parks are getting much greater use than without the programming.

The long-term goal of the Westlake Park, Occidental Square, and Urban Parks Activation Partnership is for the community-based organizations to secure sufficient private funding to cover the costs of activation. In heavily used parks such as Westlake Park and Occidental Square, vendor permit fees and support from adjoining businesses and property managers may be able to easily cover the activation costs.

However, it is unlikely that organizations managing the activation of the smaller urban parks, such as at Columbia Playground and Kobe Terrace Park, will be able to cover the activation costs independently and sustainably. Nevertheless, CBOs may be willing to take on these costs if they view the activation as a core part of their mission and the public space is party of their community's identity.

This partnership model for activating public parks may also be a model for neighborhood business improvement area organizations (BIAs) and other CBOs to activate other parks. Theoretical examples include Gateway Park and Columbia Park in Columbia City, Virgil Flaim Park and Lake City Mini Park in Lake City, and Ballard Commons Park in Ballard, and Alaska Junction Park in West Seattle. Beyond SPR, SDOT could enter into similar agreements to activate and maintain Pavement to Parks spaces. In addition, the activation partnerships could be models for CBO stewardship of public spaces, too.

Key to the activation partnerships was that the agreements required the CBO to program the space, drawing people to the park, but also provided the CBO with financial resources to conduct the programming. While the amount of activation and stewardship of public spaces would mostly be limited only by the amount of funding provided, City budgets are not limitless.

When looking toward stewarding public spaces, it'll be important to find opportunities to achieve win-wins. For example, the Evergreen Mountain Bike Association stewards King County's Duthie Hill Park, maintaining the mountain bike trails and managing all activities that happen in the park. In exchange, Evergreen Mountain Bike Association gets to keep all the receipts from the mountain bike skills camps, races, and other activities that happen in the park, minus ten percent that goes to the County for administrative costs. One could imagine Evergreen entering into a similar agreement if the Cheasty Greenspace is fully developed into a mountain bike park.

A similar model that allows BIAs and other CBOs to charge their own vendor rates to charge their own vendor rates would have a positive impact on maintaining, stewarding, and activating public spaces. In looking for places to apply the model for maintenance and stewardship, it would be important to look towards places where SPR currently lacks the resources to fully maintain the space, thereby not negatively affecting the current allocation of maintenance labor.

Recommendations

1. Continue the model of Westlake Park and Occidental Square.
2. Expand the activation partnership model to other parks throughout the city, as well as to maintenance and stewardship.
3. Allow CBOs who manage the activation or stewardship of parks and public space to charge their own permit fee amounts, provided the activities do not exclude the public and any revenues are reinvested in the activation and stewardship in the park.

Include Nonprofits in WMBE Contracting

Background

Adopted in February 2005, Seattle Ordinance 121717 requires the City to give priority to contracting with businesses that are 51% or more owned by women and minority group members. Because nonprofit organizations are not “owned,” nonprofit organizations are ineligible to receive the benefit of WMBE prioritization in contracting.

During interviews for this report, one CBO expressed how a contract they had received in the past was instead recently awarded to a for-profit consultant due to the WMBE-prioritization, who then subcontracted the CBO to perform the same work at half the rate. The CBO’s executive director is a woman, and the staff are 62% immigrant or people of color, speak 22 different languages, and are hired from within the communities they serve and conduct educational outreach.

To ensure equitable investment in CBOs who perform critical stewardship of public spaces and community engagement efforts for public space and environmental issues, such nonprofit CBOs should clearly be just as prioritized for City contracts as a for-profit company majority-owned by women and people of color. The current exclusion of such nonprofit CBOs undermines the ability for SPR and other City departments to center historically marginalized communities within community engagement, planning, design, and stewardship of public spaces.

Recommendation

- Seattle City Council to amend the Seattle Municipal Code 20.42 to include nonprofit organizations that have a majority staff who are women or minority group members.

Project Funding Pools

Background

This assessment project required evaluating the ability either to pool existing grant and other funding sources to support CBOs goals for acquisition and stewardship of public space or to have a universal criteria evaluation system.

Available funding sources and CBO-focused public space programs include the following:

- **Seattle Parks & Recreation Department**
 - **6-Year Capital Improvement Plan**
 - **Major Project Challenge Fund**
 - \$1.6 million/year available, requires match of 50% of project budget.
- **Seattle Department of Neighborhoods**
 - **Neighborhood Matching Fund**
 - **Community Partnership Fund**
 - Projects up to \$100,000, requires match of 50% of funding request.
 - The Community Partnership Fund was previously two separate grant funds called Large and Small & Simple. Between 2010 and 2016, the fund awarded more than \$4 million in funding to organizations to plan, develop, improve and activate public spaces. Of this amount, nearly \$1.5 million went to projects relating SPR's properties, and while the remainder went to projects on SDOT right-of-way, schools, or other public or private property.
 - **Small Sparks Fund**
 - Projects up to \$5,000, requires match of 50% of funding request.
 - **Your Voice Your Choice Program**
 - \$3 million/year, transportation and parks projects up to \$90,000.
- **Seattle Department of Transportation**
 - **Pavement to Parks Program**
 - \$70,000/project, 3 projects per year.
 - The Pavement to Parks Program repurposes underutilized street right-of-way into small, on-street parks. Each year, SDOT builds three new Pavement to Parks Projects, working with local CBOs. However, while CBOs frequently design the projects, especially in pre-phases funded through a Neighborhood Matching Fund Grant, SDOT requires that their own staff design the park, which sometimes results in a project not matching the community's vision.
 - **Parklet & Streatery Program**
 - A business or organization can request to install a small seating or other public area within the parking space on a street. The applicant must pay for all planning, materials, and significant permit and review fees. The applicant

must also carry \$1 million general liability insurance. CBO often secure an NMF grant to cover some of these costs.

- **Community Crosswalks**
 - Community Crosswalks are painted crosswalks that add to neighborhood identity, such as the Capitol Hill rainbow crosswalks, the Central District Panafrican crosswalks, and Little Saigon stylized crosswalks. CBOs may request a community crosswalk, but must the CBO most cover the cost (approx. \$10,000), which is often done through a Neighborhood Matching Fund grant. Unlike the Pavement to Parks and Parklets projects, SDOT does not require the CBO to carry general liability insurance for the installation.
- **Bike Rack Spot Improvement Program**
 - Free public bike racks within the city right-of-way, available to any business upon request, up to 250 bike racks per year.
- **Seattle Public Utilities**
 - **King Conservation District – Seattle Community Partnership Grant**
 - \$370,000, projects up to \$50,000
 - **Trees For Neighborhoods**
 - On request, SPU will provide four free trees per household, lifetime max of six trees.

To select the grantees, each grant fund has its own selection criteria, which is discussed in the next project prioritization recommendation section.

Many projects use a combination of funding from the different funding sources. For example, many Pavement to Parks Projects start with community planning exercises funded by the Neighborhood Matching Fund. Larger parks projects may receive early funding from an NMF Small Sparks and Community Partnership Fund for phase 1 planning and design work, later receive a Major Challenge Fund grant for a phase 2 and 3, and ultimately become included within the city's Capital Improvement Plan for final funding for construction.

In theory, combining DON's MNF Community Partnership Fund with SPR's Major Challenge Fund could streamline the prioritization of parks-related applications and provide a better review and project development of the MNF grant projects. The MNF Community Partnership Fund includes many projects that are not related to public space or SPR property, including community events, community engagement activities, and transportation improvements. Also challenging is that applicants may apply for the MNF Community Partnership Fund three times per year, while SPR's Major Challenge Fund is available only once per year.

Keeping the MNF Community Partnership Fund discrete from SPR's Major Challenge Fund has benefits as there will be many public space projects that are unrelated to SPR properties. SPR staff would not be in a great position to manage these non-parks projects.

Currently SPR's Neighborhood Planner coordinates the review of all MNF applications that relate to parks. This work should continue. In addition, if the City adds a Capital Development Project

Manager to assist CBOs, this individual should proactively work with grantees to ensure their projects are in line for future funding.

Recommendation

- Do not combine the NMF Community Partnership Fund with SPR's Major Challenge Fund, or combine any other funding streams. Instead, increase coordination and management by SPR staff with DON's Neighborhood Matching Fund and Your Voice Your Choice Program to ensure park-related CBO projects are efficiently managed between the multiple funding opportunities.

Project Prioritization

Background

SPR's Capital & Maintenance Budget, SPR's Major Challenge Fund, and DON's Neighborhood Matching Fund each of separate criteria and scoring systems for prioritizing project selection. Each of these funding programs are meant to achieve different purposes, and therefore some criteria and scoring differentiation is warranted. However, in order to be compliant with 2014 Comprehensive Plan and *EDI Plan*, some adjustments are merited.

The *EDI Plan* required that all departmental functional plans and citywide investment decisions to heavily weight equity criteria, including the factoring in the maps and indices for priority populations, displacement risk, and opportunity access. The *EDI Plan* even specifically called for the 2014 *Parks Legacy Plan* to apply the equity criteria, which it did not.

A version of opportunity access is included in the Asset Management Plan scoring for SPR's Capital & Maintenance Budget. But this evaluation of opportunity access accounts for less than five percent of the total possible score, and displacement risk and priority populations are not considered.

SPR's Major Challenge Fund evaluation considers whether proposed project would meet an unmet but previously identified need, which is similar to but not the same thing as determining whether a specific neighborhood is in need of greater public investment or more parks, as the OPCD opportunity mapping provides. SPR does include "Equitable Prioritization Criteria," which is very similar to OPCD's priority population indices. The Equitable Prioritization Criteria accounts for 25% of the total possible points.

DON's Neighborhood Matching Fund scoring system is simple and two-fold: 50 points for building community partnerships and 50 points for readiness. In addition, any parks-related proposals get screened by SPR for viability. The NMF scoring system does not appear to account for priority populations, displacement risk, or opportunity access.

By contrast, equity-related factors account for 65 percent of project evaluation by the Minneapolis Parks and Recreation Board, and for 12 percent by the Portland Parks & Recreation Bureau in prioritization projects for its capital improvement plan. San Francisco, which uses nine yes/no criteria rather than a scoring system, includes whether a proposed park space is in a "high need area" and whether it's in an "open space deficit area" as two of the nine factors (22 percent).

SPR and DON need to update their prioritization criteria to be consistent with the EDI Plan's requirement that equity criteria be heavily weighted, especially the factors of priority populations and opportunity access. Besides better achieving the goals of RSJI and EDI, more consistent criteria across funding programs will better ensure multi-phase projects will be positioned for additional funding across the funds and ultimately in the capital improvement plan.

Recommendations

1. SPR and DON should use OPCD's opportunity access and priority population indices and maps as part of its selection criteria and scoring for the Asset Management Plan, Major Challenge Fund, and Neighborhood Matching Fund.
2. The scoring for opportunity access may need to account for neighborhoods' access (or lack thereof) to specific types of public space, such as P Patches, athletic fields, dog parks, nature trails, swimming pools, and bicycling and running opportunities.
3. The scoring should take into account the value of small parks and park-like experiences in accessing parks, such as bicycling along Ravenna or Lake Washington Boulevard to Green Lake or Seward Park.
4. Within the Asset Management Plan scoring, equity factors of priority populations and opportunity access should account for at least 20% (combined) of the total possible score.
5. Within the Major Challenge Fund, less emphasis should be put on whether the project fulfills an unfunded element of SPR's capital improvement plan and an additional criteria should be added to the scoring matrix to account for whether the project is in a neighborhood of low opportunity. The current "Equitable Prioritization Criteria" that accounts for the existence of priority populations should continue to be weighted as 25% of the total scoring.
6. Within the Neighborhood Matching Fund selection criteria, DON should add opportunity access and priority populations as two factors, combined accounting for at least 33% of the total scoring.

Neighborhood Matching Fund improvements

Background

During interviews of CBO staff in preparation for this report, several people expressed that the Department of Neighborhoods' Neighborhood Matching Fund (NMF) should be improved to make the projects simpler and more accessible. The three main issues raised were (1) the amount of effort required to apply for a Small Sparks Fund grant, (2) the burden and complexity of reporting and compliance, and (3) timing of funding.

Small Sparks

The Neighborhood Matching Fund has two grant opportunities: the Community Partnership Fund for up to \$100,000 and the Small Sparks Fund for up to \$5,000. The application form and the selection criteria are the same for both. The expressed theory behind this approach is that it provides the opportunity for applicants to first get adjusted to the application process with the Small Sparks Fund before applying for the much larger Community Partnership Fund.

However, in practice this approach most likely screens out organizations and individuals who are the least well-versed and trained in dealing with government from ever applying for a Small Sparks Fund grant. As a result, historically underserved and underinvested in communities are likely disenfranchised in the process.

Reporting & Compliance

Several CBO and Seattle Parks Foundation staff described an arduous reporting system to demonstrate volunteer hours and invoices paid to consultants and contractors. The complexity of the system soaks-up CBO staff time and brain power that could instead be dedicated to executing the project.

Timing of Funding

DON current policy is to only disburse funds after the CBO has demonstrated it has paid an invoice or otherwise paid a project cost. For CBOs who do not have a well-endowed fiscal sponsor to help front payment of costs, this policy is a significant challenge toward the organization's cash flow.

Contracting

Awardees, including CBOs, who have received NMF grants are not allowed to use the grant to pay for their own staff time. Instead, they must contract with an outside consultant or contractor to do the work. However, many CBOs are best positioned to conduct the planning, public engagement, or physical work associated with an NMF grant, and have the deepest ties to the community that the project will benefit. RSJI and EDI policies encourage the City to invest more within underserved and underrepresented communities and to build institutional capacity within the community. Allowing CBOs who have been awarded NMF grants to get paid using the NMF funding would strengthen the communities most in need of investment.

Recommendations

1. DON should create an alternative, simpler application form for Small Sparks Fund applications.

2. DON should explore adopting a new NMF reporting system that is simpler and less time intensive. Preferably the new system would already be in use by another agency — such as the King County Conservation District — so CBOs and their fiscal sponsors would already be comfortable in using it.
3. DON should explore ways to address CBOs' cash flow problems in paying a portion of project costs upfront, such as by (A) providing ten percent of the total award value at the start of the project and (B) disbursing up to \$5,000 to a CBO upon showing an invoice rather than upon showing receipt of payment.
4. Allow CBOs who have been awarded NMF grants to use the dollars to pay for their staff time associated with the project, especially when the CBO represents a historically marginalized community.

Your Voice Your Choice improvements

Background

The Department of Neighborhoods manages the Your Voice Your Choice Program (YVYC), which is a participatory budgeting program that enables people to submit ideas for improving streets and parks, participate in further developing the project ideas, and finally selecting the winning projects to be funded.

YVYC currently has \$3 million in annual funding for projects that are \$90,000 or less. These projects can include everything from new playground equipment in a park to a curb bulb and crosswalk near a school. Projects are selected by each of the city's seven council districts, and there's a new advisory committee that helps establish additional criteria to ensure project selection is equitable in and between council districts. Both SDOT and SPR staff assist in the development of the projects, first by providing an initial screen of the projects after the ideas are submitted and then after the participatory project development phase. The projects are then installed by the agencies the following year.

In 2018, well over a thousand ideas were submitted for consideration. After SPR and SDOT screened the projects, DON led 31 neighborhood project development workshops for people to develop and score the ideas. In addition, DON is leading several meetings of the advisory committee, the participants of which are getting paid \$50 per hour to attend.

In short, this is a time and resource intensive program, both for DON staff and for the participants. The end result is that out of the 1,000+ ideas by hundreds of people attending dozens of meetings, just 33 small transportation and parks projects will get funded. A few people have likened the program to the Hunger Games.

In a context of scarce resources to fulfill every person's ideas, YVYC is faced with two dueling purposes: (1) expose people to their government to educate them on how capital projects are developed and to quickly demonstrate tangible results, and (2) make meaningful investments for transportation safety and park enhancement equitably across the city. The limited resources means less than 3 percent of people's ideas for projects get fulfilled, meanwhile the process for selecting the projects is so burdensome that it causes burnout and for many people to give up on the process altogether.

Recommendations

- Prioritize achieving YVYC's purpose of participatory budgeting and project development significantly above the expectation that program will make meaningful and equitable investments in transportation safety and park enhancement.
- Combined with a later recommendation in this report, embed YVYC into quarterly interdepartmental open houses held in each district.
 - At each quarterly open house, attendees would be able to submit new project ideas, engage in participatory project development of the ideas submitted at the previous

- open house and screened by SDOT and SPR, and finally vote on the projects that went through participatory project development at the previous open house.
- Additional ideas and participatory project development would also be made possible through an online interactive forum or tool.

Centering Communities in Project Development & Engagement

Background

During the interviews, many CBO and foundation staff, and City staff whose role specifically focused on race and social justice efforts, expressed the importance of “centering communities” within project development and the public engagement processes. They spoke of early and intentional engagement with identified historically underserved and marginalized communities, “co-creating” plans and projects with communities, building leadership and knowledge capacity within individuals and CBOs, and valuing the time, energy and limited resources of CBOs. The recommendations are with these conversations, visions, and values in mind.

The foundational documents for ensuring communities are centered within project development and public engagement processes are the City’s *Racial Equity Toolkit* and the *Inclusive Engagement & Community Outreach Guide*.

The *Racial Equity Toolkit* was designed for assessing the potential impact of City budgets, plans, and other departmental functional documents, although after its creation later RSJI plans and executive orders have required its application to the project-level.

SPR staff do not actively and directly use the *Racial Equity Toolkit* or the *Inclusive Engagement & Community Outreach Guide* for project planning and design efforts. Instead, in creating the template for its “Design Plans” for planning and associated community engagement of new and improved parks, SPR staff used the *Racial Equity Toolkit* to shape the form and content of the Design Plans.

Although the *2015-2017 RSJI Plan* had encouraged consistency in applying the *Racial Equity Toolkit* across departments and projects, the *2014 EDI Plan* also authorized departments to tailor the *Racial Equity Toolkit* to their specific needs. In order to “center communities” within project planning and design, SPR should create an improved tool and process that integrates the best of Seattle’s Racial Equity Toolkit, King County’s Equity Impact Review Process, and Seattle’s *Inclusive Outreach and Public Engagement Guide*, and King County’s 2016-2022, *Equity and Social Justice Strategic Plan (ESJ Plan)*.

The new approach should focus more on the process rather than a prescriptive toolkit for one individual to complete, and should take into account the need for both a simplicity as well as need for documentation for interdepartmental coordination between current projects and so future city staff can build upon past efforts within communities.

Recommended Framework

SPR’s new equity toolkit/process should use King County’s Equity Impact Review Process (EIR) as its model, and combine the City’s *Inclusive Outreach & Community Engagement Guide* into the process.

The King County EIR centers communities into its framework by engaging stakeholders early in the EIR analysis without presupposing unnecessary outcomes, while the *Inclusive Outreach & Public Engagement Guide* is an comprehensive, effective planning tool for engagement.

Here's proposed structure to combining the King County EIR and City's *Inclusive Outreach & Public Engagement Guide*, as well as including OPCD's

1. **Step 1:** Scope and identify who will potentially benefit and hurt by the project.

a. **Pre-Planning:**

- i. Review the matrix of inclusive engagement strategies to understand the spectrum of actions that better center communities within the project development.
- ii. Identify project team members, the departmental Change Team members, Department of Neighborhoods staff, and other city staff from other departments that should be consulted in the project's development.
- iii. Working with OPCD and SPR staff, collect data for the project's adjacent neighborhoods regarding OPCD's mapping and indices for priority populations, displacement risk, and opportunity access, as well as SPR's maps for access to specific types of public space and recreation access, such as a neighborhood's need for natural areas, playfields, playground equipment, and P Patches.

- b. **Scope of Work:** Determine the timeline, expected budget for the project, and opportunities for additional funding and project expansion in order to set clear expectations for project stakeholders.
- c. **Roles:** Describe the objectives of involving the public in the process and the degree to which public influence is possible.
- d. **Identify Stakeholders:** Based on the OPCD dataset of the neighborhood's priority populations, previous outreach work on past projects, and discussions with staff at local DON Community Centers, identify the key stakeholders in a neighborhood, especially stakeholders who may benefit or be harmed by the project. The stakeholder groups should include those from the general public, racial/ethnic groups, nonprofit advocacy and service organizations, other public agencies, the private sector, decision-makers, city departments, and other public agencies.
- e. **Check-In #1:** Project lead must check-in with departmental leadership, communications staff, and other departmental staff for advice for the initial assessment of scope, roles, and stakeholders.
- f. **Resources:** If the affected neighborhood is an OPCD-designated area of low opportunity with a high percentage of a priority population, then SPR should designate increased resources to community engagement strategies.

2. **Step 2: Community Centered Design**

- a. **Assessment:** Engage with community stakeholders to determine their priorities and concerns, their expectations, their resources, and what relationships they have with others. Engagement level for assessment should be based on the context of the

project and the stakeholders, using a range of strategies such as one-on-one meetings, presentations and workshops at CBOs' meetings, and project community advisory committees. When working with the community stakeholders, the SPR project lead should:

- i. Describe how the City's goals for opportunity to access will be addressed, and how SPR's goals for providing a range of public space opportunities will be addressed by the project
- ii. Use quantitative data to describe how the proposed course of action will affect known disparities.
- iii. Identify potential unintended equity-related outcomes of the action.

- b. **Public Engagement Plan:** Engage with community stakeholders to develop a public engagement plan. The project lead should actively brainstorm with stakeholders public involvement tools and activities that are appropriate for the project timeline and budget and value and utilize the community's resources. Following the stakeholder input, the project lead should draft the public engagement plan.
 - i. Staffing & Organization
 1. Determine whether an advisory group or community partnership is needed.
 2. Describe the resources and staffing necessary to carrying out the public involvement activities, including staff responsibilities and roles, community responsibilities and roles, and funding needs for communications, events, and consultant services.
 - ii. Communications & Timeline
 1. Determine the basic communications strategy and goals, including the key messages for the project, the strategy for communicating with the media, and what the translation and interpretation needs of the project are.
 2. Develop a timeline and month-by-month calendar of the public involvement schedule.
 3. Determine and describe the necessary reporting mechanisms/products, including any media/communications pieces, progress reports, final reports, formal recommendations, briefings and presentations for decision-making bodies.
 - iii. Priority populations
 1. Describe how priority populations and key stakeholders will be engaged in the process in a manner that values and respects their resources.
- c. **Check-in #2:** Project lead must report assessment findings and public engagement plan to departmental leadership for review and approval.

3. **Step 3: Public Engagement & Project Development Process**
 - a. Implement the public engagement process.
 - b. In early stage project planning, develop several potential alternatives for the public and stakeholders to provide input on. For each alternative, describe the how it

might affect community priorities and concerns, who might be disproportionately burdened or benefited, and how equity conditions might improve or worsen.

Alternatives should be prioritized based on equitable outcomes and reconciled with functional and fiscal policy drivers.

- c. Throughout public engagement and project development, check-in with stakeholders to hear what their concerns are and what changes they want and what they want left unchanged.
- d. **Check-in #3:** Project lead must report the project alternatives analysis to community stakeholders and departmental leadership.

4. Step 4: Final Project Selection & Implementation

- a. The project lead must report the final plan/design to the community stakeholders, along with justifications for the project design decisions.
- b. If the project includes stewardship or activation by a CBO, a plan should be put into place to ensure an agreement is entered into with SPR.
- c. If the project could have second or third phases with additional funding, a community work group and a fundraising plan should be put in place for the potential future phases.

5. Step 5: Reporting and On-Going Learning

- a. A final project report should be filed with the Department of Neighborhoods, Office of Civil Rights, and within a centralized location at SPR for future project managers to reference, both within SPR and in other departments. The final project report should include:
 - i. The initial equity assessment, including the data and mapping for priority populations and opportunity access, as well as the identified potential beneficial and harmful impacts of the project.
 - ii. The initial public engagement plan developed with the community stakeholders.
 - iii. The stakeholders engaged in the community, and their expressed interests and concerns.
 - iv. A final assessment by the stakeholders on how well SPR engaged them in the process and their overall feeling regarding the final product.
 - v. A final assessment by the project lead about the challenges, successes, and lessons learned during the project.
- b. **Final Check-in:** After project close-out, the project team and departmental Change Team should meet one last time to discuss lessons learned from the project and how to implement those lessons in future projects.

Engagement Strategies

Background

Throughout interviews with CBO and foundation staff, individuals expressed the need for the City to value CBOs' and community members' time better.

To conduct more inclusive outreach, a greater percentage of the public engagement needs involve City staff going to identified priority populations and stakeholders, and a smaller percentage dedicated to strategies that historically marginalized communities feel less comfortable attending.

The biggest culprit is the generic project open house. To recruit people to attend, postcards and emails may get sent out, almost always only in English in its entirety. At the open house, project staff may give technical presentations for 20 to 40 minutes, followed by 20 minutes of questions and answers. Around the room will be display boards for additional follow-up with project staff. This environment lends itself to those with college degrees and an experience with public speaking, not to non-English speakers, immigrants, or people who feel historically disenfranchised by the government.

Providing food and child care are two good strategies frequently employed to lower the burden to the public to attend. Having in-language translators in attendance can also help, as can holding meetings at times reflective of the needs of specific cultures and work schedules. Still, these strategies mostly lower some specific barriers while failing to address the basic structural barrier that the format is uncomfortable for people who have been historically marginalized.

One story was shared by a CBO who provides services and voting rights trainings to hispanic immigrant communities. A government entity approached the CBO to conduct an educational training, and wanted to follow a standard meeting format where the meeting would be held at a central, public location and the CBO would recruit people to attend. But in today's current context of the possibility of harassment and deportation, the CBO correctly determined that people would be too fearful to attend a meeting led by government staff. Instead of either the agency or the CBO leading the meeting, the CBO decided to work with a local pastor at a church to inform his congregation about the training program and then the church held the training at its facilities, without public advertisement. As a result, many more people were willing to attend.

Although people's fears may be less than deportation, the fears of people who have been historically marginalized in public programs and public processes are just as real. It's critical that the City employ activities that meet people where they're at, literally.

Recommendations

Community Conversations Open House Format

The first step to prioritizing intentional outreach to priority communities is to reduce the amount of time, effort, and resources dedicated to public engagement formats that are contrary to inclusiveness.

The Department of Neighborhoods and OPCD have already led the way with the “Community Conversations” open house format for the Housing Affordability & Livability Agenda. During the Community Conversations open houses, many different departments are present with their own display boards for their projects. In addition, typically there have been no presentations at the open house; instead, attendees walk around the room, reading the display boards and interacting with project staff members one-on-one.

The Community Conversation format has several benefits, including:

- The meeting format is more casual and less confrontational.
- The attendees can engage with the subject matter at their own pace.
- With many City departments present, the City can speak as one voice. If one attendee has a question about a transportation issue, they can talk with an SDOT staff member; if another attendee has an affordable housing question, they can talk with an Office of Housing staff member.

We recommend building on the Community Conversations model for all public open houses. Instead of every transportation, park, and utility project have their own independent public open houses, the Department of Neighborhoods would hold quarterly Community Conversations in each city council district.

Each transportation, parks, utility, or other city project would be encouraged/required to conduct intentional stakeholder engagement, but any general public open house would need to be included only as part of a quarterly Community Conversation. In addition to the aforementioned benefits of the Community Conversations, this quarterly, district-based open house structure would also:

- Reduce the number of public open houses that interested residents would have to attend.
- Reduce the amount of time and resources that city projects have to dedicate to organizing public open houses.
- Increase the amount of time and resources that city projects can dedicate to stakeholder engagement.

Within the quarterly Community Conversation format, it would not be possible to have presentations to the entire group of attendees. Instead, departments and projects could produce 3-to-5 minute informational video presentations displayed on TVs with headphones, and then have staff on-hand to answer questions. After watching the videos, attendees would be able to ask questions directly to the project staff on-hand. The videos could also be posted online with surveys and as “online open houses,” providing greater engagement outside of the in-person open house format.

Booths and displays should prioritize interactive and tactile engagement, that help attendees participate in providing feedback and not simply read displays and talk with staff. Good booths and displays include putting stickers on photos or renderings to “vote” for favorite design options and tactile activities like Legos, drawing walking routes, and connecting ideas by string in order to

encourage attendees to think through how they would prioritize project elements given scarce resources.

In order to assist non-English speakers to attend and engage with the project displays, in-language interpreters could lead groups of people, station-by-station around the room to each display and to interact with the project staff. This would greatly increase the inclusiveness and accessibility of open houses to non-English speakers.

Most public open houses currently provide some food at public meetings, and occasionally child care. By having fewer but larger open houses, child care would be easier to provide and a greater range of food options could be provided to ensure most cultures are accommodated. We'd also recommend holding more of the meetings at SPR's community centers, which are already the front-line interface for many residents with their City.

Finally, as previously discussed, including the Your Voice Your Choice Program within the quarterly, district-based Community Conversations would provide a tangible reason for people to attend and participate. With the ability for people to share new ideas for small transportation and parks improvements, help develop previous project ideas, and conduct final selection of projects at every Community Conversation, people will have a stronger motivation to attend and participate.

Inclusive Engagement Strategies

As described in the the City of Seattle's Inclusive Outreach and Public Engagement Guide, there is a spectrum of outreach and engagement activities, falling into the categories of (1) inform, (2) consult, (3) collaborate, and (4) shared decision-making. To center communities within project development, engagement strategies should aim toward the collaboration and shared decision-making end of the spectrum. The more communities are centered within the project development, the more likely the project will be more equitable and lead to lasting community benefits.

There is not a one-size-fits-all approach to inclusive engagement. It is especially important to always be clear and honest with stakeholders about what they have the power to decide given a project's scope, budget, timeline, and functional policy and political considerations.

With less time and resources dedicated to public open houses, we hope the project teams should dedicate more resources to the following engagement activities:

- Giving presentations and workshops during meetings of identified key stakeholder groups, at their invitation, such as ethnic-focused service organizations and churches.
- Conducting more outreach during the community celebrations and activities, such as street festivals.
- Meeting with key stakeholder organizations multiple times as the project develops.
- Training community center staff about projects.
- Having tactile, engaging displays and community centers that encourage people to mark their priorities for new park projects.
- Holding stakeholder public meetings within the identified park space.

- Conducting door-to-door outreach near a given project.
- “Transcreating” materials with CBOs so project materials are both in-language and culturally competent, utilizing photos and phrases that will be more resonate with priority populations.

Community Liaisons, and a Partnership Model to Community Engagement

In 2017, Seattle’s Department of Neighborhoods (DON) changed the name of its Public Outreach & Engagement Liaison program to the “Community Liaison” program. DON contracts with more than 60 people to serve as in-language community liaisons. In 2016, the community liaisons reached more than 2,000 people who spoke 16 different non-English languages, 60 percent of whom had never interfaced with City government before. In addition, some of the liaisons are trained to provide specific outreach for Seattle Public Utilities and for specific neighborhoods.

SPR also has a Community Engagement Ambassadors (CEAs) program, which was launched in 2016. The CEAs build awareness among hard to reach audiences about opportunities, services and programs and to increase physical activity and health awareness within high health disparity populations. There are currently 14 CEAs and the program is building up to 30. They are each temporary employees, providing 1,040 hours of work for translation and interpretation services, recruitment to meetings, and assistance for Get Moving grantees. The CEAs are trained in RSJI and cross-cultural competency, and are authentic in their conversations.

Many other cities have similar liaison programs. As part of its review on how to improve its public engagement strategies and racial equity outcomes, King County contracted Equity Matters for a national study of liaison programs.⁵¹ This study, which reviewed six different liaison programs across the country in detail and highlighted another 23 programs, is now serving as the foundation for a major overhaul of King County’s several liaison programs.

The Equity Matters study categorized liaison programs along a spectrum of: (1) inform, (2) consult, (3) dialogue, (4) collaborate, and (5) community directs action.

Following the study, King County has begun internal processes to combine its several liaison programs into one County-wide liaison network where the liaisons serve as “bridge-builders” between key communities and the County, with an emphasis on establishing engagement models consistent with the “dialogue” and “collaborate” models. In order to establish this “bridge builder” network, the County will make direct investments in CBOs to facilitate engagement with underserved and underrepresented populations, and hire individual part- and full-time community liaisons in other underserved communities where the County is unable to partner with a CBO.

By pooling the liaison programs from across multiple departments into one single network, which the County’s Office of Equity and Social Justice will oversee, the individual liaisons will be better resourced and trained to engage with their identified communities. Instead of getting part-time contracts for specific projects, the liaisons will be able to treat these positions more as full-time

⁵¹ King County DNRP, “Limited English Proficient Liaison and Marginalized Community Network: Best Practices and Feasibility Assessment” (2014).

jobs, communicating about all of the County's activities as it relates to a community or neighborhood.

The partnerships with CBOs will also insure there is more institutional knowledge transferred from liaison to liaison if there is ever turnover in the position. The CBO partnership model will also help establish a stronger "trusted advocate" within the community for people to look to, and the CBO will likely also provide a greater degree of resources to reach a specific community thanks to email lists and built-in social networks.

Finally, by more fully resourcing the liaisons across multiple departments and in partnership with the CBOs, the liaisons should have more time to not just inform affected communities about upcoming projects, but also be able to listen to and empower the community to get involved.

We recommend that the City of Seattle more fully embrace this new partnership model being developed by King County. It would benefit all departments and projects, including SPR projects. Specifically, the Department of Neighborhoods should evolve its Community Liaison program to include the following elements:

- Fund liaison positions within CBOs.
- Expand the liaison network from being primarily in-language positions to also including priority community organizations that may be primarily English-speaking.
- Set an expectation that liaisons will spend (A) half their time informing their communities of City projects, and (B) half their time listening and relaying the community's priorities back to the city and training and empowering the community to engage in public processes and speak for itself.
- Rely on the liaisons to conduct 75% of the outreach while the project staff conduct the other 25%, where the liaisons do the low-level informational outreach and the project staff do the expert-level answering of technical questions.
- Train liaisons on all city projects that might affect the identified community/neighborhood for a specific liaison, not just the projects that a particular department pays for outreach.
- Lower the costs for departments to utilize the liaisons.
- Train the liaisons on cross-cultural competency and effective outreach strategy.

Citywide Database and Mapping of Projects, Stakeholders, and Engagement

Background

Both CBO and City staff expressed a need for better coordination between departments on project development. To improve coordination, information about current and past projects need to be more easily shared among project teams across departments and within departments.

Although several of Seattle's RSJI 3-year plans called for a centralized repository of completed Racial Equity Toolkits and public engagement plans, no such interdepartmental database or file system currently exists, at least at the project level. Even within departments there tends to not be a systematic way to file and track racial equity toolkits and public engagement plans. Instead, much of this information is stored within the institutional knowledge of individual staff members.

King County recognized a similar problem and is now requiring all completed Equity Impact Reviews and public engagement plans to be filed with the County's Office of Equity and Social Justice. In addition, building off of its equiting mapping work, King County will also be developing a database and mapping tool for project managers to track public and stakeholder engagement on their projects. This will allow project managers from across departments to see both current and past projects in an area, see who the engaged stakeholders were, and see what concerns the stakeholders had.

The City of Seattle may have a similar platform to build off from. Recently, the City began tracking all capital projects via a new mapping tool called "dotMaps," which allows capital projects to be tracked across departments. It's possible that this tool could also be used to track stakeholders and their concerns.

By better tracking CBOs' and other stakeholders' concerns, the City will be more responsive to the community and fewer issues will get lost over time.

Recommendations

- Require all project-level racial equity assessments, community engagement plans, and final project reports to be filed with the Department of Neighborhoods, accessible by all the departments for current and future use by other departments and project teams.
- Track community engagement, including stakeholders and their expressed concerns, using a mapping tool either similar to King County's maps or Seattle's dotMaps.

RSJI Training & Accountability

Background

City staff who regularly prioritize race and social justice issues in their work plans expressed a need for greater training and accountability among all City staff members on RSJI. Currently staff are required to take a RSJI class in their first year on staff, but continued education is voluntary. The three-year city assessments of its progress toward meeting the RSJI goals indicate that while nearly every staff member has gone through a training and understand the importance of addressing racial and social justice issues generally, there is a widespread lack of understanding on how they can apply the principles to their day-to-day work. Based on conversations with City staff, one of the main problems isn't just the knowledge for applying the principles to daily practice, but also a lack of a deeper commitment toward addressing root causes.

Mayors Nickels, McGinn, and Murray each attempted to create greater and greater at the departmental leadership level. For example, the *2015-2017 RSJI Plan* required department directors to include four uses of the *Racial Equity Toolkit* within their performance plans with the mayor, and required departments to report annually on their use of the *Racial Equity Toolkit* and *Inclusive Outreach and Public Engagement Guide*.

Recommendation

- Require every City staff member who is classified as a strategic advisor; who within a department's executive level; who conducts budgetary, functional planning, or project level planning or design; who creates public engagement plans; or who interacts directly with the public to participate in at least one RSJI training each year with a topical focus that is relevant to their work.
- To the annual performance review for every City staff member who is classified as a strategic advisor; who within a department's executive level; who conducts budgetary, functional planning, or project level planning or design; who creates public engagement plans; or who interacts directly with the public to include an assessment on how they performed in fulfilling the RSJI objectives.
- Require departments and mayor's offices to submit annual RSJI plans and annual RSJI performance reports with the Office of Civil Rights and Department of Neighborhoods, which shall make all annual plans and annual performance reports publicly available online.