

versus as they are scheduled to be approved. This would present an opportunity to include actual changes to future amendments if items are discovered to have a negative or neutral racial equity impact. Providing adequate time to meaningfully assess potential equity impacts creates opportunity for advocacy for our most vulnerable and impacted communities. Completing thorough equity assessments using the GARE model is the basis for a standard Equity Assessment in Watershed Protection with intention to continue to provide critical analysis and evaluate how projects and regulations impact our vulnerable communities. Evaluating these choice points and identifying unintended burdens to community takes time and commitment from the authoring teams as well as future TAG members. Time invested for these projects allow for opportunities to identify historical precedent and opportunities to engage community and stakeholders. To ensure findings of an Equity Assessment can be meaningfully developed, considered, and implemented, it is essential to scope an assessment in coordination with the WPD Equity Coordination Team as early in the process as possible.

Based on this initial evaluation of the 2022 Environmental Code Amendments Phase 1 deliverable, we identified a combination of unknown, potential positive, potential negative, and neutral racial equity impacts. We recommend that WPD allocate resources to implement the following recommendations to amplify potential positive or neutral impacts and mitigate potential negative impacts:

- Recommend immediate development of a WPD program to provide funding to cost share deeply affordable housing developments to meet existing water quality and drainage requirements as well as the proposed code amendments related to “green” infrastructure. The goal of program would be to promote community and environmental health benefits while offsetting any potential affordability impacts due to additional cost.
- Recommend immediate attention to potential internal equity impacts within Watershed Protection, specifically to the Field Operations Division, in coordination with findings in the Fiscal Impact Analysis. Evaluate potential impacts to workload and allocate immediate resources for staffing, training, facilities, and equipment to ensure there is abundant capacity to meet the anticipated increases that may result from this proposal. Ensure Field Operations Division is a primary stakeholder in developing and implementing related future recommendations such that design standards are oriented towards long term maintenance needs.
- Recommend tracking for staff administrative variances in proposal to ensure accountability in internal equitable decision-making.
- Recommend the TAG continue to coordinate with the project team on the Phase 2 deliverable and conduct a more in-depth assessment of equity impacts for the specific components of the proposal. This work may include development of a proposed framework and process for evaluating code amendments for equity impacts going forward.
- Develop scope for a full equity assessment of all environmental code to be conducted in 2023 with recommendations for potential code changes presented to Council by Fall of 2023.

We understand that the recommendations will require additional resources and further scoping, which can be coordinated with the WPD Equity Coordination Team. We urge the Executive Team to allocate WPD resources to this effort, as identified.