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# CITY OF BELLINGHAM 2023-2027 ASSESSMENT OF FAIR HOUSING

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## Glossary of terms

- **Affordable Housing** – for the purposes of this document, affordable housing is defined as housing which does not cost more than 30% of a household’s total income (including rent, mortgage, fees, utilities, insurance, etc.), regardless of the type of housing. For housing to be permanently affordable, it often must be subsidized.
- **Comprehensive Housing Affordability Strategy (CHAS)** – data set released by HUD using Census data from the 2015-2019 American Community Survey (ACS) and pertaining to housing costs and cost burden across different protected classes.
- **Cost Burden** – any household paying more than 30% of that household’s total income for housing (including rent, mortgage, fees, utilities, insurance, etc.) is considered cost burdened. Households paying more than 50% of total household income for housing are considered severely cost burdened.
- **Department of Housing & Urban Development (HUD)** – a department of the Federal government which enforces Fair Housing laws. The City of Bellingham is an entitlement jurisdiction, meaning that it receives funding from HUD annually.
- **Fair Housing** – refers to the federal Fair Housing Act (FHA) of and it’s 1998 amendments to protect people from negative housing actions that occur because of race, color, national origin, religion, sex, disability, or family status, which are “protected classes” under the FHA. State and local fair housing laws cover additional groups, such as marital status, sexual orientation, gender identity, age, veteran or military status, and source of income.
- **Public Housing** – for the purposes of this document, public housing is any housing that is owned by the Bellingham/Whatcom County Housing Authority or another non-profit or government agency that provides subsidized housing, usually to low-income residents.
- **Subsidized Housing** – for the purposes of this document, any type of housing that receives a public subsidy which makes it available to low-income residents at below market rates based on income or need. Subsidized housing is not necessarily affordable or permanently affordable.

## **I. Executive Summary**

1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

The City of Bellingham's Assessment of Fair Housing (AFH) update process began in December 2021. Working closely with the Community Development Advisory Board, City staff developed a broad list of stakeholders and community organizations and finalized our Community Participation Plan in February 2022. The public participation process began with the launch of the [Equitable Access to Housing page](#) on Engage Bellingham, the City's public engagement web platform, and the launch of the Housing Equity & Access Survey in April 2022.

The Community Development Advisory Board (CDAB) also recommended that staff focus outreach efforts more intently on meeting stakeholders in-person and doing targeted outreach and interviews, and less emphasis on broad public surveys and online engagement, compared to the previous AFH. The Community Participation Plan reflects this shift. In addition to the online survey and Engage Bellingham, staff reached out to several local stakeholder groups and conducted in-person listening sessions, targeted surveys, and other engagement activities.

HUD provided sixteen data tables (included in Appendix A) and seventeen maps (available online at <https://egis.hud.gov/affht/>) with information on demographics, poverty, affordability, transportation, disability, etc. HUD also provides data on seven Opportunity Indicators: Low Poverty, School Proficiency, Labor Market, Transit, Low Transportation Cost, Jobs Proximity Indices, and Environmental Health. These tables and maps were used to respond to and update many of the questions in the AFH.

Bellingham has no HUD-identified racially or ethnically concentrated areas of poverty and our levels of segregation remain low by HUD benchmarks. Analysis of HUD data tables shows some disparities, however none of these disparities are concentrated solely among a single racial or ethnic group or other protected group, or within a particular geographic area.

To supplement the HUD-provided data tables and mapping tools, the City pulled local data from sources such as the Bellingham School District, Bellingham/Whatcom County Housing Authority, Bellingham's Residential Survey, and US Census American Community Survey (ACS). These alternative data sources were used to generate several custom maps.

Analysis of HUD-provided and other data sources reveals some notable findings:

- Overall, the jurisdiction was 86% White and about 7% Hispanic/Latinx. However, race and ethnicity demographics of the city look very different when observed by age or family type:
  - Residents over 65 years of age are 92% White and non-Hispanic or Latino.
  - Families with children are twice as diverse as the city's population as a whole.
- Bellingham has a significant racial and ethnic disparity regarding homeownership. Of the owner-occupied housing units in Bellingham, only 10% were occupied by non-White householders. The Black, non-Hispanic population of the jurisdiction make up less than 1% of the owner-occupied households in the jurisdiction, and while Hispanic

householders make up 7% of the jurisdiction, they only make up 4% of owner-occupied households (and by contrast, make up 9% of renter-occupied households).

- Income and racial segregation have increased over the last decade; there are more Census tracts where both non-White and low-income residents are concentrated, compared to the city average.
- Disproportionate housing needs are highest among renters, single-female households with children, and Native American households.

HUD directs grantees to consult a list of contributing factors, provided by HUD, to create Fair Housing goals and select priorities to address those contributing factors. A robust process of community engagement and solicitation of public feedback provided many contributing factors, most of which were also included on HUD's list. After reviewing all the Fair Housing data, survey data, and public comments during community meetings, seven contributing factors were identified from HUD's list. In order of significance, those contributing factors are:

- Lack of access to opportunity due to high housing costs.
- Location and type of affordable housing.
- Availability of affordable units in a range of sizes.
- Source of Income discrimination.
- Lack of local private Fair Housing outreach and enforcement.
- Land use zoning laws.
- Community opposition.

These contributing factors were used to identify appropriate goals and milestones. While most of the metrics and milestones proposed in the 2018-2022 AFH have been completed, the broader goals still apply. Taking into account the public feedback gathered, and local and HUD-generated data sources provided, the City plans update the Fair Housing Goals as follows:

- Goal #1: Implement adopted City planning policies through appropriate development regulations that support expanded housing choice and increased inventory.
- Goal #2: Support people who face housing discrimination by examining where the City may add additional supports and protections.
- Goal #3: Provide education on Fair Housing to property managers and owners as well as renters and tenants to increase public understanding of Fair Housing laws.

## **II. Community Participation Process**

1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board and other resident outreach.

Throughout the Assessment of Fair Housing (AFH) and Consolidated Planning process, City staff updated the City Council and Community Development Advisory Board (CDAB) as to the progress. In addition to the regular channels used by the City to notify the public of upcoming agendas and public hearings, the City created a dedicated web page where the public can obtain timely updates and read background information related to the AFH and the Consolidated Plan (<https://engagebellingham.org/consolidated-plan>). This webpage is part of the City's community engagement platform and includes interactive components where the public can ask questions and submit comments directly to City staff regarding the Consolidated Plan and AFH.

Like the prior AFH, staff released a Housing Equity Survey to get feedback on how the City is upholding the Fair Housing Act and providing equal access to housing opportunities in Bellingham. This survey was more streamlined, with fewer questions. The survey included four sections: demographics, strategies to increase equitable access to housing, Fair Housing, and housing discrimination. The survey results are summarized in Appendix B. This survey was conducted in both English and Spanish and was available both online and in print format.

In addition to the public Housing Equity Survey, staff followed up with two targeted surveys. The initial public survey had nearly 400 complete responses; however, the demographics of participants revealed that this survey was over-representative of homeowners and white, non-Hispanic residents. To reach more Hispanic families, a survey was sent through the Bellingham School District with an incentive for participating. This generated over 100 additional responses, 92% of which were from respondents who identified as Hispanic or Latinx.

The second targeted survey was sent to a group of housing professionals whose role is to work with low-income tenants. These included landlord liaisons, housing case managers, attorneys, and mediators. Complete responses were received from 20 individuals in this targeted group, but their responses were asked to reflect on their collective experiences working with hundreds of clients.

Staff also had a sustained focus on meeting with stakeholders in person, instead of relying only on the survey data and online platform for public participation. To that end, staff conducted in-person listening sessions with low-income public housing residents at a Bellingham Housing Authority property, attended two back-to-school events, one at Villa Santa Fe and the other at Sterling Meadows, which are owned by Catholic Housing Services and Mercy Housing Northwest, respectively, and house low-income and farmworker families. City staff engaged

with residents of mobile home parks through ongoing targeted outreach that was part of a municipal code update. Staff engaged with seniors through the Aging Well Whatcom's Housing Blueprint process and co-hosted a session with the AARP on residents' experiences and priorities around housing. Finally, an interactive listening session to meet with members of the disabled community, their supporters and caregivers was held at the Max Higbee Center.

2. Provide a list of organizations consulted during the community participation process.

- Aging Well Whatcom
- Bellingham/Whatcom County Housing Authority
- Bellingham School District
- Bellingham Tenant's Union
- Catholic Community Services
- Chuckanut Health Foundation
- Community Resource Network
- LAW Advocates
- Lydia Place
- Mercy Housing Northwest
- Max Higbee Center
- Northwest Justice Project
- Northwest Youth Services
- Opportunity Council
- Road2Home
- Western Washington University
- Whatcom Housing Alliance
- Whatcom Dispute Resolution Center

3. Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?

In general, the outreach activities elicited participation from a broad array of community groups and stakeholders. We successfully reached low-income residents and families with children, which we've struggled to engage with in the past. Through concerted efforts, we were also successful in reaching a much bigger percentage of our Hispanic/Latinx community members.

Two demographic groups we failed to reach in numbers proportionate to our community as a whole were renters and young people. This is partly because the majority of public outreach occurred during the summer months, when the university and colleges were not in session. Plans are in place to connect with more student-led groups and hear from this demographic in the coming months as we develop the Consolidated Plan.

4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

### **Housing Equity Surveys**

Through general and targeted surveys, we heard from 492 Bellingham residents, plus 20 local housing professionals. This was a sample size representing approximately 0.5% of Bellingham's population. The complete results of the community Housing Equity Survey can be found in Appendix B.

Overall, this survey sample was representative of the following demographic groups:

- People at all income levels, with proportionate representation of low-income households.
- White respondents were proportionate with Bellingham's White population.
- Hispanic and Latinx residents were initially underrepresented in the sample, but after some targeted outreach were 23% of the overall respondents, which is desirable because Hispanic and Latinx residents have been underrepresented in past surveys.
- Families with children were overrepresented in the sample, which is desirable because this is one of our priority populations.
- People with disabilities, another priority population, were about 20% of respondents, which is proportionate with Bellingham's disabled population.

The survey sample was not representative of the following demographic groups:

- Renters, who were 37% of our survey respondents, compared to 55% of Bellingham's general population.
- Asian American and Pacific Islanders residents, who were only 0.8% of respondents compared to 5.6% of Bellingham's population.
- Black/African American residents, who were only 0.3% of the survey sample, compared to 1.6% of Bellingham's population.
- Young people, although respondents were not asked their age, based on the high percent of homeowners and families with children, it is reasonable to assume our large population of young people aged 20-24 was underrepresented.

Every effort will be made to better engage with these populations during the Consolidated Plan public participation process.

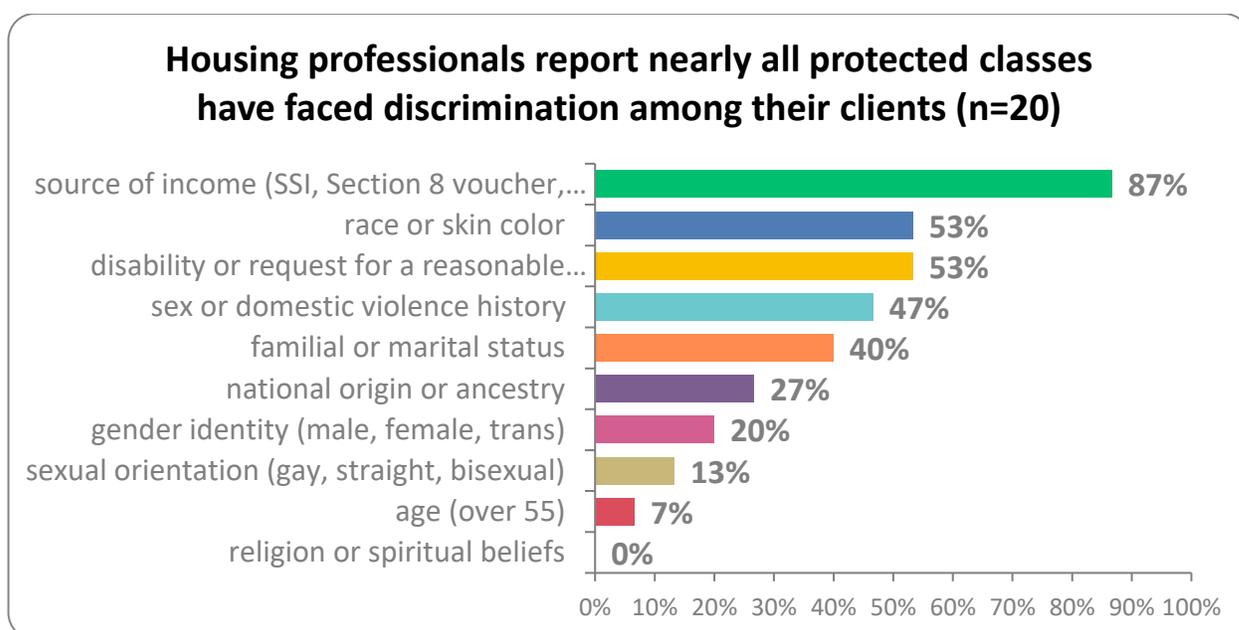
The major themes identified through the multiple choice and ranked choice questions from the survey were as follows:

- Of the strategies the city is already using, the top priority for the community among the options given was ***construction of permanently affordable apartments***. This priority was consistent among income levels.
- Of the strategies that the city is not already using, the top priorities were to ***require all new developments to provide some affordable housing for low-income residents*** (inclusionary zoning) and to ***support limited-equity housing cooperatives (non-profit condominiums)***.

- The factors that were identified as most contributing to inequality here in Bellingham were *lack of access to opportunity due to high housing costs* and the *location and type of affordable housing*. Issues like discrimination, environmental hazards, and schools ranked very low.

Of the 492 community survey respondents, 85 (17%) reported that they had faced some type of housing discrimination. Of those that shared the personal characteristic they believed was behind this discrimination, 38% said it was for something other than a protected class (for example, being low-income or being a student). The most reported type of discrimination based on a protected class was source of income discrimination (26%). Other types of discrimination against protected reported classes were disability, race or skin color, age (over 55) and family status.

The housing professionals surveyed reported similar trends. Housing professionals were asked, “In your experience working in Bellingham, have your clients encountered discrimination based on any of these protected classes?” 87% of the respondents reported they’d had a client who experienced source of income discrimination. Race or skin color and disability discrimination were also reported by over half of the respondents.



In response to the open-ended questions, several trends were identified. The most common themes are summarized below, by question.

In response to the question, “What are some other ways you think we could improve equitable access to housing in Bellingham?” there were 201 responses.

- 76 (38%) recognized **zoning and policy** as factors that directly impact housing availability. Most respondents who talked about zoning described significantly

reducing single-family zoning in Bellingham for the purpose of increasing housing stock, and to change zoning if it does not ensure equitable access to facilities for community members regardless of where they live. In this section, many people said there should be a policy in place that reserves affordable housing within new multi-housing development. Also mentioned here, is the inclusion and access of ADUs as additional dwelling spaces.

- 56 (28%) recommended stronger **housing and human services programs** to support vulnerable communities such as those who struggle with homelessness, addiction, etc. Many respondents advocated for more low-income, middle, temporary and public housing with few barriers. Also mentioned was the increased support for tiny homes.
- 22 (11%) brought up issues relating to **landlords and rental requirements**. Specifically, people expressed frustration with the need for co-signers, high application fees or having to make 3x the rent, they asked if there's anything the city can do in this regard. Additionally, respondents find issues with accountability regarding how landlords handle reported property issues. Lastly, there is interest here in exposing landlords to accessible housing such as Housing Choice Vouchers.
- 21 (10%) suggested Bellingham should focus on **density** and building vertically.
- 21 (10%) found that placing a **rent cap** was necessary to ensure that rent reflects the wages of local people.
- 20 (10%) identified **taxes** as incentives for ensuring the housing market remain equitable. Respondents suggested tax incentives for developers to incorporate affordable housing, lowering property taxes so they don't get put onto tenants if property is rented out, tax breaks for low-income homeowners, tax people who buy a second home locally and don't use it as their private residence, tax those who sell their home within two years of purchase, give tax incentive to landlords to keep rent rates level.

In response to the question, "Is there anything else that you think we should know about access to opportunity in Bellingham?" there were 180 responses.

- 37 (21%) identified rising **housing costs** as a main contributor that impacts access to housing.
- 21 (12%) noted that opportunity is hindered by **discrimination or prejudice**.
- 21 (12%) claimed **extensive rental requirements** made it difficult for tenants to secure housing.
- 18 (10%) wrote about accessibility issues related to **house ownership**.
- 16 (9%) noted that **private investors** are key players in the monopolization of local housing.
- 16 (9%) connected a **shortage of housing** to the lack of available housing.

### In-Person or Virtual Meetings

Another key component of our public participation process was through in-person meetings and focus groups. At the recommendation of the CDAB, staff prioritized targeted meetings

on-site with our special needs and historically under-surveyed populations, especially by meeting people where they are, as opposed to inviting them to attend an off-site meeting at City Hall. To that end, we attended or organized the following outreach events:

- A virtual listening session with seniors, which was convened by Aging Well Whatcom on March 24<sup>th</sup>, with 4 residents in attendance.
- A listening session with residents of Bellingham Housing Authority properties at Lincoln Square on June 13<sup>th</sup>, with 7 residents in attendance.
- A table at a back-to-school celebration with residents of Villa Santa Fe, a property owned and operated by Catholic Housing Services. Attendees were invited to take a short survey or participate in an activity about their needs and priorities.
- A table at a back-to-school celebration with residents of Sterling Meadows, a property owned and operated by Mercy Housing Northwest. Attendees were invited to take a short survey or participate in an activity about their needs and priorities.
- An event with members of the developmentally disabled community and their caregivers at the Max Higbee Center, sponsored by the city. There were 43 attendees, who listened to a short presentation and were able to ask questions and share feedback with a variety of city staff.

### **Written Comments**

The public had the opportunity to submit comments via Engage Bellingham, the city's online public engagement platform, and also to send them directly by email. The following comments were received during the community participation process.

Comments submitted via Engage Bellingham:

*Remember low-income home owners.* "We've been lucky. We were able to save for a down payment while living in public housing. We were able to buy a beat up fixer-upper that the owner just wanted to get rid of. We were able to get low cost financing. But, it's getting harder to pay our mortgage because taxes keep going up. Please don't forget low-income home owners when making your plans. Our income isn't keeping pace with inflation or with tax increases." DMC October 27, 2022.

*Add rentals to single family areas by limiting the number per building.* "We've rented for a loooong time and in various neighborhoods. If we want integration, rental units in single family home areas need to be no bigger than four-plexes. Otherwise, the renters will never interact with the homeowners. The renters stick together while the homeowners stick together. Just my experience." DMC October 27, 2022

*More than just a single-point problem.* "This is more than just a single-point problem. Therefore it should have more than a single-point solution." The commenter went on to explain in detail several ways this should be addressed, which are summarized below:

1. Address House Availability Right now, we have a severe lack of available housing that doesn't consume most of a household's income.

2. Address Rampant For-Profit Renting.

3. Keep Profits In-State to Grow the Community

“And don't forget outreach! How many renters even know what an FHA First Time Home Owner loan is? How many understand that by being a vet, or the dependent of one, they can get a housing loan from the VA? These aren't talked about in families who have never owned a home, and not taught in high school. I had to take an economics course at Western before I'd even heard the phrase FHA loan. Teach these things in middle schools, and again in high schools. Teach our children how to manage their money, and the realities about saving for a home and how to apply for one.” October 26, 2022

*Correct systemic government regulatory barriers.* “Basing housing policy on a popularity vote is not scientific--note that many people want rent control which INCREASES housing shortages, for example. Look at the sources of housing unaffordability rather than putting band-aids on outcomes based on what the most non-experts vote on. How easy is it to build housing in Bellingham vs. dealing with zoning regs, growth management laws, environmental rules, etc. NIMBYism creates housing unaffordability so until you open up the market for new housing in an area with growing population any other measure exacerbates the situation. And public housing like any government-controlled product will be inefficient and politicized so if the answer is (which it is) "we need more housing" look at fixing why more private housing can't be built--and follow the evidence including that even more high end housing helps because it opens up lower end housing as people move up.” October 25, 2022

*Define 'affordable' versus non-affordable rentals, and engage appropriately.* “Affordable rentals should carry certain features -- lower taxation, more restrictions on rent increases, landlord incentives, eligibility for government support of various kinds, etc. Wealthy housing should carry a higher tax rate, and does not need landlord incentives or protection from rent increases or government support. If a landlord wants to move their 'affordable' rental into the non-affordable strata, they should pay more and lose the incentives and benefits afforded to affordable rentals.” June 2022

*Limit Rental Increases.* “Rent increases should be limited to 3% per year. An apartment on Northwest (brick 2-story at the intersection of North St.) recently came under new management. My understanding is that rent jumped suddenly from \$1100/mo to \$1500/mo (a 73% increase), and that most or all of the tenants and their children/families had to move out. This displacement of our terrific neighbors, along with now other poor management practices of the new management company (lawn now a foot tall; garbage now strewn throughout the alley, not picked-up) is bad for the neighborhood, bad for local employers who depend on low-wage-earners, and bad for the displaced renters. The owner (a wealthy Bellingham resident) is the only person benefiting from this, at the expense of literally everyone else. These apartments would have been considered 'low-income' -- germane to Bellingham's interest of having a certain volume of low-income housing -- but now that pool of available low-income housing is reduced.” June 2022.

*Creating Opportunities.* “I agree with Beth, keeping minimum wage close to what would be considered a living wage and keeping it proportional to housing/rental increases would be impactful to many folks. For those who earn slightly above minimum wage, these folks are

not usually impacted by minimum wage creeping closer to the wage they earn (except in morale). I do believe solutions for those statistically considered "low-income" based on income bracket are essential, but what about those just above it? The low-to-middle income can't receive food benefits, so the cost of living is higher due to increased cost of groceries, and they can't receive low-income rent or house-buying assistance due to that income either, which means they have no way forward to stabilize their housing situation. Perhaps a sliding scale regarding housing assistance might be helpful. Another idea is perhaps establishing a trust/housing grant that can assist low and middle-income folks with covering the \$150,000 down payment needed to keep a \$300,000ish mortgage affordable on a lower income. It could be like a scholarship - application based - and perhaps incorporate a lottery component to help avoid discrimination based on name. Again, given the increasing cost of purchasing a place to live, \$150,000 down payment might not be enough to keep the payment at a livable amount, but something needs to be done about this." May 2022.

*Fluctuating living wage.* "A highly sustainable solution to housing people and keeping living affordable that could relieve the city of some of the cost to continue to provide would be minimum wage. In order to work around the "no rent control" rule, Bellingham should introduce a minimum wage policy that assesses (On a quarterly basis) the median cost for a two bedroom residence, multiply that by 3 (the income recommended and often required to secure housing) and divide this monthly amount by a full time, 4 day week, work schedule. That then becomes the minimum wage. Disabled and low income people then can receive a 2/3rds amount of this as basic living monthly income. This will both put more pressure on businesses to provide living wages to their employees so that our tax dollars aren't being used to cover the cost of McDonald's (for example) to continuing to pay poverty wages. It also will make it increasingly costly for housing developers to continue making cheap quality, luxury priced apartments, and encourage a level of controlled rent, and lower the cost of empty homes sitting on the market for investment buyers. Funds can then go towards community outreach, childcare, resources/legal aid/advocacy for disabled people, making existing homes more environmentally friendly, and so much more. This would truly be innovation the Bellingham way." May 2022.

Emails:

On October 28, an individual submitted an email on behalf of a group of low-income seniors who reside at Eleanor Apartments, in Bellingham. The email expressed serious concern that the plan does not adequately address the need for preservation of affordable rental housing for seniors. The group expresses their concerns that the rents at Eleanor Apartments has increased by 30% over the past five years, and rents have become unsustainable for very low-income seniors on fixed incomes. The group of residents has reached out to local officials and has yet to receive any response, and will be partnering with the Washington Low-Income Housing Alliance to focus attention on this issue.

On October 28, one individual in South neighborhood submitted an email stating the assessment "seems to show there is no low income rental housing" in their neighborhood. The person went on to give several examples of (naturally occurring) affordable housing in their neighborhood, and to express hope that it will not be rezoned. They also stated that

these are good examples of low-income housing that provides a lot of opportunities for community interaction.

On October 26, an individual wrote “The review seems thorough but the proposed strategies seem incommensurate with the need. (I didn't see an estimate of the unmet needs for affordable housing other than figures on the percents of households spending more than 30% of their income on housing, but we know the need is great.) It seems unlikely that the City can fund enough affordable rental or for-purchase units to meet that need, so it will be necessary to provide incentives for inclusionary private building. It would behove the City to study what those would have to be in order to be effective.”

On October 26, a faculty member from the College of the Environment and Institute for Energy Studies referenced the article about the AFH in the *Bellingham Herald*, and wrote, “I'm [...] trying to better understand present and future climate risks residents may face and how housing can impact different residents' vulnerabilities to slow-changing climate variability (e.g. smoke from forest fires) or extreme climactic events (flooding last year). Can we register a comment about addressing housing need with an eye to long-term climate vulnerability (on top of everything else)?”

On October 22, an individual wrote, “I do not see where you plan addresses low-income senior renters on a fixed income. There needs to be a rent subsidy. If you are a low-income senior homeowner the city has a program where they get reduced taxes. Not all seniors can or were able to afford purchasing a home. There is no such program to help low-income seniors. There should be subsidy low-income seniors can apply for to offset thrive fixed income or enact a policy where rent can not be raised more than 20%. Currently Washington does not have restrictions as to how much a landlord can raise the rent when contracts are renewed.”

On October 24, an individual wrote: “Hi, in reading the AHF summary, 2 items held my interest:

1. City residents would benefit from relaxing zoning rules (and permitting) regarding ADUs, duplexes, and manufactured homes parks.
2. The City should make a stronger effort to reach renters and non-white people, ensuring that more are aware of the survey and how to complete it. Example: I live in Washington Square. One notice placed on a bulletin board (amid several items also on the board) may satisfy the letter of the law, but does it satisfy the spirit of the law?”

On October 21, an individual wrote, “I totally agree that government needs to get into the business of housing just like the UK did after WWII. Initially applicants should be qualified by income, but eventually, as in post WWII Britain all comers should be admitted and pay rent on a sliding scale. Developers are only interested in what will reap the most profit: unaffordable luxury homes and condominiums. When I lived in Portland years ago, they had a requirement that a certain percent of units in new developments be available to low income folks on vouchers. Don't know how that worked for Portland, but I knew several disabled persons who were ever so grateful. One fellow was especially happy because his unit was in a multi story complex with a grocery store on the street level. He could get

groceries and hot deli foods without getting on the bus. If developers complain about my suggestion, they've got no compassion."

On October 21, an individual wrote, "Any candidate who wants my vote MUST prove their progress on increasing affordable housing in Bellingham. I don't care what else they've done. I don't care which party they're with. AFFORDABLE HOUSING. That's it. We need to attract developments of small, basic houses at the \$150K price point and below that offer easy financing to those with solid income but bad or no credit. Home ownership is the single driver of wealth accumulation. Too many of us are denied this opportunity to buy into the American Dream. We vote."

### **Public Hearing**

The official public comment period was from October 3, when the draft AFH Update was published online (<https://cob.org/services/housing/assessment-fair-housing>) and available in print at the Bellingham Public Library, through October 28, 2022. A notice was published in the Bellingham Herald, as well as a Press Release and social media posts alerting the public to where they could find the draft plan and how to provide comments. Following the press release, the Bellingham Herald ran an article on October 21<sup>st</sup>, titled "*Concerned with Bellingham's fair housing practices? Now's your chance to comment.*"

One member of the public attended the hearing but did not have any comments on the AFH. Members of the CDAB provided feedback and comments, which have been incorporated within this update.

**III. Assessment of Past Goals, Actions and Strategies**

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:
  - a. Discuss what progress has been made toward the achievement of fair housing goals.
  - b. Discuss how successful in achieving past goals, and/or how it has fallen short of achieving those goals (including potentially harmful unintended consequences).
  - c. Discuss any additional policies, actions, or steps that the program participant could take to achieve past goals, or mitigate the problems it has experienced.
  - d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

Below are the four goals selected for the 2018-2022 Assessment of Fair Housing. Discussion questions a, b, c, and d are addressed for each goal within the corresponding table.

Goal #1: Implement adopted City planning policies through appropriate development regulations that support expanded housing choice and increased inventory.

Goal #2: Examine where the City may want to add protections for people who face housing discrimination.

Goal #3: Provide education on Fair Housing to renters and tenants as well as property managers and owners to increase public understanding of Fair Housing laws.

Goal #4: Provide support and advocacy for households receiving housing vouchers through utilization of landlord liaisons and housing case managers who can advocate and provide education on their behalf.

Goal #1	Metrics & Milestones	Progress towards achievement
<p><b>Implement adopted City planning policies through appropriate development regulations that support expanded housing choice and increased inventory</b></p>	<p>In preparation for drafting new ordinance(s), City staff will:</p> <p>Review existing Comprehensive Plan policies that support increasing housing choices throughout the community and work with City Administration and Council to prioritize and implement policies. This includes expanded areas for higher density and infill housing and increased housing options within single family neighborhood zones.</p> <p>Re-evaluate the ‘family’ definition to better reflect the realities of the community and allow shared housing</p>	<p>Review completed by spring 2018. Ordinance(s) brought forward within 2 years (by May 2020) for regulatory changes.</p> <ul style="list-style-type: none"> <li>✓ The State of Washington is currently reviewing the ‘family’ definition at the State level. The City will adopt code changes to fit within the State’s new guidance, when available.</li> <li>✓ An ordinance was adopted by City Council on October 25, 2021, to allow all Residential Multi-family zones to achieve</li> </ul>

	<p>managed by local nonprofits participating in Coordinated Entry in areas where state licensed group homes are currently a permitted use.</p> <p>Continue to produce and preserve affordable housing using funds generated from the upcoming housing levy, at the same or higher rate (an average of 60 units/year).</p> <p>Prioritize affordable housing projects in neighborhoods with low rates of students on free or reduced cost meals (5% or less) to discourage concentrated areas of poverty.</p>	<p>intended densities, as many of these areas have been significantly underdeveloped.</p> <p>A second Housing Levy will be considered by City Council in 2018 for a public ballot measure.</p> <ul style="list-style-type: none"> <li>✓ The Housing Levy was renewed by the public in November 2018. It will remain in effect for ten years.</li> </ul> <p>Add a preference for new housing in low-poverty neighborhoods to the City’s future Notices of Funding Availability (NOFAs).</p> <ul style="list-style-type: none"> <li>✓ New low-income housing projects are in progress or under development in high-income areas: Barkley (Trail View) and Waterfront (Millworks), two neighborhoods previously lacking any subsidized housing projects. Both received City funding.</li> </ul>
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**Discussion**

The specific milestones described under this goal have all been achieved. However, the need for affordable housing for those earning low and moderate incomes in Bellingham continues to grow, as housing prices and rents have both increased steeply over the past 3 years. This was especially exacerbated by the COVID-19 pandemic. Even though achieving these milestones helped to provide more housing choice and increase inventory of permanently affordable housing, the need is increasing faster than new projects or zoning changes can be implemented. The City will need to continue to pursue additional strategies to address the housing crisis.

Goal #2	Metrics & Milestones	Progress towards achievement
<p><b>Examine where the City may want to add protections for people who face housing discrimination.</b></p>	<p>Analyze options for protections of additional classes of renters, including those with Section 8 or other housing subsidies, and other options for reducing barriers for renters, including:</p> <ul style="list-style-type: none"> <li>• prohibiting source of income discrimination,</li> <li>• requiring sufficient notice prior to evictions and rent increases,</li> <li>• prohibiting criminal background checks as part of rental applications.</li> </ul>	<p>City Council to consider an ordinance within 2 years.</p> <ul style="list-style-type: none"> <li>✓ On March 12, 2018, a new ordinance (2018-02-004) took effect in Bellingham that prohibits source of income discrimination, requires 60-day notice for no-cause lease terminations, and requires 60-day notice for rent increases above 10%.</li> </ul>

**Discussion**

The Bellingham’s City Council passed an ordinance providing additional protections for vulnerable renters shortly before the State passed a similar ordinance also banning source of income discrimination. Although these two laws have now been in effect for several years, current assessment of Fair Housing public outreach indicates continued discrimination against renters who apply for housing using Housing Choice Vouchers and other public assistance. More work needs to be done in partnership with our community to increase education among landlords and property managers and address this issue.

In the end, City staff did not recommend prohibiting criminal background checks, as it may not be compatible with Washington State laws.

Goal #3	Metrics & Milestones	Progress towards achievement
<p><b>Provide education on Fair Housing to renters and tenants as well as property managers and owners to increase public understanding of Fair Housing laws</b></p>	<p>The City will support at least two events specifically targeted to property owners/property management companies, and two events targeted to renters.</p> <p>Develop or provide links to existing resources regarding property owner and tenants’ rights under Fair Housing laws. Post on City website, distribute at educational events and in public places.</p> <p>Revise the Rental Registration Certificate required to be posted</p>	<p>The in-person education events will take place through 2020, with additional education needs evaluated at that time.</p> <ul style="list-style-type: none"> <li>✓ Since publication of the 2017 Assessment of Fair Housing, the City has regularly hosted and participated in Fair Housing training and education events geared towards both landlords and property managers/owners and tenants. Staff have participated in a dozen events reaching over 800 participants.</li> </ul> <p>Printed educational materials will be produced and made available by Fall 2018,</p>

	<p>onsite with added information about renter rights, and develop informational handouts for distribution at the time of inspection.</p> <p>Coordinate with local colleges to ensure that current students and recent graduates have access to information about their rights and available resources, and develop a plan for effectively disseminating information to student renters.</p>	<p>and will remain available electronically for download for the duration of the AFH timeline.</p> <ul style="list-style-type: none"> <li>✓ Educational materials regarding the new ordinances protecting vulnerable renters were developed in fall 2018.</li> <li>✓ The City has maintained a Fair Housing page on our website with numerous links to trainings and resources, available at: <a href="https://cob.org/services/housing/fair-housing">https://cob.org/services/housing/fair-housing</a>.</li> </ul> <p>Rental Registration Certificate and informational materials will be developed by Winter 2018-19 and rolled out on the same timeline as rental registration updates.</p> <ul style="list-style-type: none"> <li>✓ When Rental Registration inspectors visit a property and there is no one present, a door hanger is left for the occupant which has resources for tenants, including the City’s website (<a href="http://www.cob.org/rentals">www.cob.org/rentals</a>), LAW Advocates tenant clinic, and the Whatcom Dispute Resolution Center.</li> </ul> <p>Meet with WWU, Bellingham Technical College, and Whatcom Community College to develop a plan and timeline, to be complete by start of the fall 2018 academic school year.</p> <ul style="list-style-type: none"> <li>✓ Since 2018, the City has participated in eight separate in-person and online educational events with students from Western Washington University (WWU) and the Bellingham Tenant’s Union to provide education about Fair Housing laws and tenant’s rights.</li> <li>✓ These events reached over 400 total participants.</li> </ul>
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**Discussion**

Providing Fair Housing education has become a regular part of the department’s work program. In most years, the City sponsored or participated in at least three separate education events. Due to limitations

during the COVID-19 pandemic, only one event was held each year in 2020 and 2021. Since that time, both the City and the public have become more adept and accustomed to online platforms. The City recently hosted a live online event with multiple panelists from the Northwest Justice Project, Opportunity Council, and Whatcom Dispute Resolution Center. The invitation was sent to all property managers and owners on the Rental Registration and Safety Inspection Program database. This event was simultaneously broadcast on BTV for the general public.

Goal #4	Metrics & Milestones	Timeline for Achievement
<p><b>Provide support and advocacy for households receiving housing vouchers through utilization of landlord liaisons and housing case managers who can advocate on their behalf and provide education.</b></p>	<p>Fund at least 4 housing case manager and/or landlord liaisons who can aid in identifying new private units.</p> <p>Increase coordination among local housing agencies for more effective tenant advocacy and communication with landlords.</p>	<p>Maintain the newly funded landlord liaison position and support for housing case managers through 2022.</p> <ul style="list-style-type: none"> <li>✓ Maintained landlord liaison position and support for housing case managers through 2022.</li> </ul> <p>Support better coordination in currently funded positions through modified contract terms and proactive communication with housing case managers by July 2020.</p> <ul style="list-style-type: none"> <li>✓ Additional case managers were hired at the Opportunity Council and Lydia Place to focus on seniors and families with children.</li> <li>✓ Based on feedback from housing agencies, a new contract for Diversion Services was added.</li> </ul>

**Discussion**

Additional services and supports were crucial, especially during the COVID-19 pandemic and with continuing impacts on household income and the housing market. The City did more than offer support for households receiving housing vouchers; it dramatically increased rapid rehousing programs and added diversion case management. Households needed a tremendous amount of support with every aspect of obtaining housing, which was made more difficult through the pandemic. Things like obtaining identification went from taking a couple of weeks to many months, with offices closed and normal processes stymied. Services and supports must be balanced with availability of housing units and vouchers available to make those units affordable. Due to a huge gap in housing unit availability, even those with vouchers are often unable to find someplace to live. The City will continue to balance the services offered based on available rent assistance and housing units.

#### **IV. Fair Housing Analysis**

##### **A. Demographic Summary**

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

A review of HUD Table 1<sup>1</sup> data indicates that the city of Bellingham's population demographics are very similar to the racial and ethnic composition of the region (Whatcom County). In 2020, the city of Bellingham was 0.36% more White, 0.33% more Black, 0.96% less Hispanic, 1.07% more Asian or Pacific Islander, 1.27% less Native American, and about 1% less foreign-born than the Whatcom County Census Bureau Statistical Area (CBSA) region. One area where Bellingham differs significantly from the region is the percent of residents with limited English proficiency (LEP). This was 12.6% of the population of Bellingham, compared to 4.7% of the population of Whatcom County. Spanish is the most common LEP language in both Bellingham and Whatcom County, with 5% of the population being LEP Spanish speakers in Bellingham and 2.44% in Whatcom County.

Beyond the demographics of race, ethnicity, and national origin, the jurisdiction and region are similar in other ways. Analysis of disability by type shows very similar percentages of residents who are disabled by each disability type. The percentage of families with children shows both the city of Bellingham and the region at about 42% families with children. By age group, one place where the jurisdiction differs is the percentage of children under age 18, with 16% of Bellingham's population compared to 21% of Whatcom County's population.

A review of Table 2 shows a population of 56,590 in the City of Bellingham in 1990. At that time, the City's racial composition was 92.5% White, less than 1% Black, 2.5% Asian or Pacific Islander, and 1.73% Native American. Only 2.4% of the population was Hispanic in 1990. The foreign-born population was 6.8% and 2.3% were LEP. The population in Whatcom County at that time had a similar composition, except the Native American population was significantly higher at nearly 3%.

The 2020 Census results show that in thirty years, the city of Bellingham's overall population increased by 24,426 people (43%). The city's population has become less White (by over 10%) and more Hispanic (from 2.4% to 6.9%). The percentage of Asian or Pacific Islanders has increased by 2.2%, and the Black population has increased by 0.5%. During the same 30-year period, Whatcom County saw a population increase of 73,395 residents (57%). While the population of the region has increased by even more than the jurisdiction, the change in racial and ethnic composition has been proportionate.

##### **B. General Issues**

###### **i. Segregation/Integration**

###### **1. Analysis**

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<sup>1</sup> All data tables provided by HUD for this analysis are included in Appendix A.

- a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

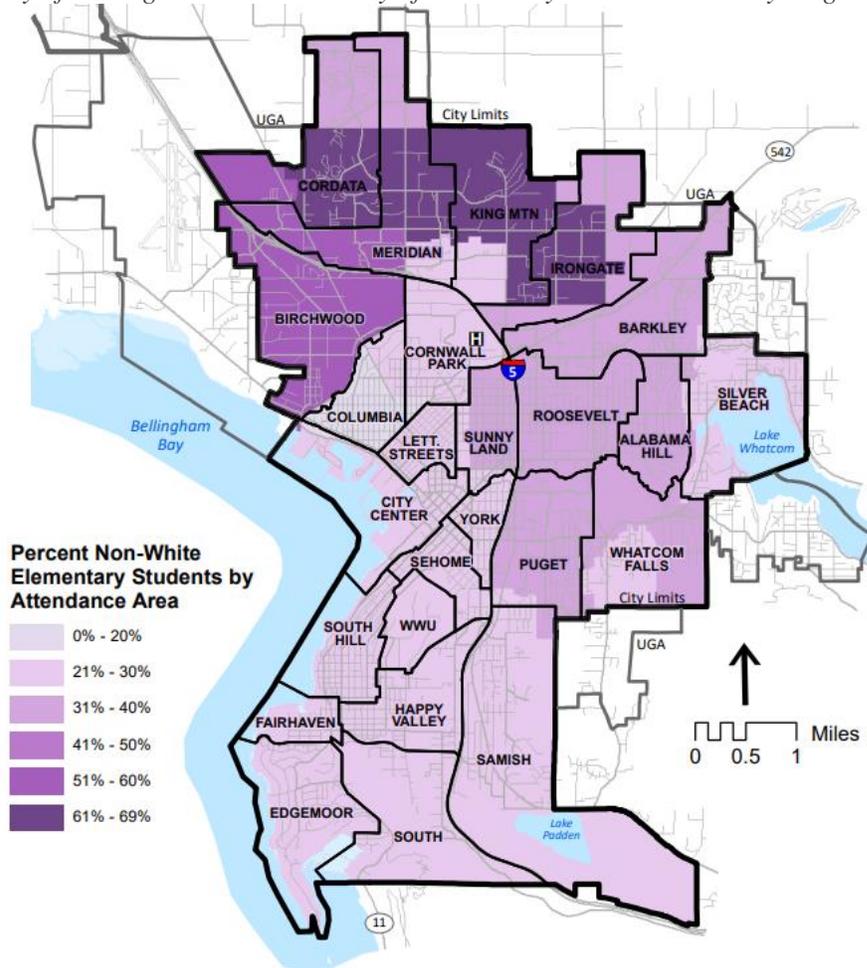
Table 3: Racial/Ethnic Dissimilarity Trends demonstrates that the city of Bellingham's segregation levels for all races and ethnicities have remained relatively low over the 30-year period between 1990 and 2020, compared to other areas of the country. Dissimilarity Index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation. In the jurisdiction, the highest level of segregation in 2020 was between Hispanics and Whites, at 26.72. The second highest level of segregation was between Asian and Pacific Islanders and Whites at 25.63. These values are all within HUD's low-segregation range of 0-39. However, there is a trend of increased levels of segregation from 1990 to 2020. For example, segregation between Non-White and White groups fell from 19.69 in 1990 to 15.96 in 2010, but then rose sharply to 22.34 between 2010 and 2020.

In Whatcom County, the highest level of segregation was between Black and White populations in 1990, at 30.62. While levels of segregation have decreased overall, an uptick between 2010 and 2020 in Whatcom County is consistent with what was identified in the jurisdiction.

- b. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

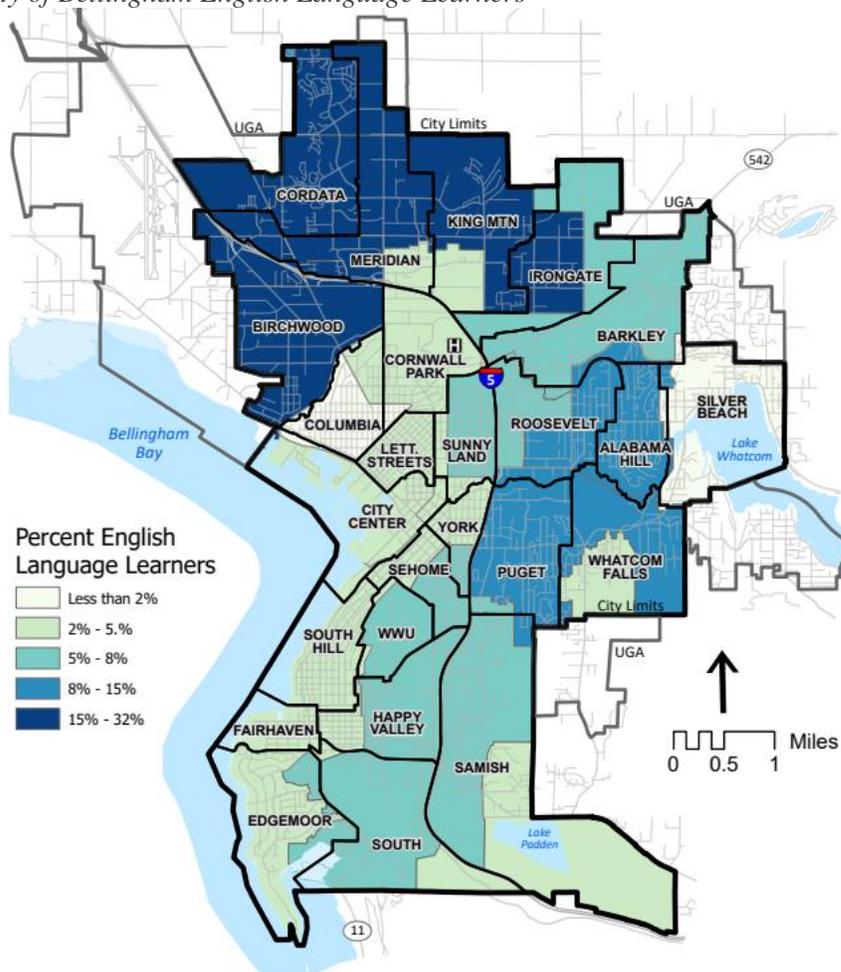
While Bellingham does not have any HUD-identified Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), and segregation is generally low, local data indicates that some neighborhoods are more or less integrated. Figure 1 below shows the percent of 2020/2021 enrolled public school elementary students identified as non-White, or more than one race, for each attendance area. The areas with darker coloring are more diverse and more integrated, while the areas that are lighter color are less diverse.

Figure 1. City of Bellingham racial diversity of elementary school students by neighborhood



Similarly, Figure 2 below shows students who are English Language Learners (ELL), which corresponds to LEP families with children. Columbia neighborhood has the lowest percentage of students who are non-White and ELL. The neighborhoods of Cordata, Birchwood, Meridian, King Mountain and Irongate in the north of the city have the highest percentages of ELL students, and also the highest concentration of non-White students.

Figure 2. City of Bellingham English Language Learners



Map shows percent of 2021/2022 enrolled public school elementary students identified as English Language Learners. Data source is WA State Office of the Superintendent for Public Instruction, Report Card data for Bellingham, Ferndale & Meridian districts.

- c. Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).

During the last assessment of Fair Housing(2016/2017 school year), data showed similar trends: the north and west parts of the jurisdiction had a much higher proportion of non-White students compared to the south. Since then, the percentage of non-White students have increased in these same neighborhoods, but remained low in south and central Bellingham. This is consistent with the trends noted above, in which HUD data reveals that segregation between White and non-White populations is increasing.

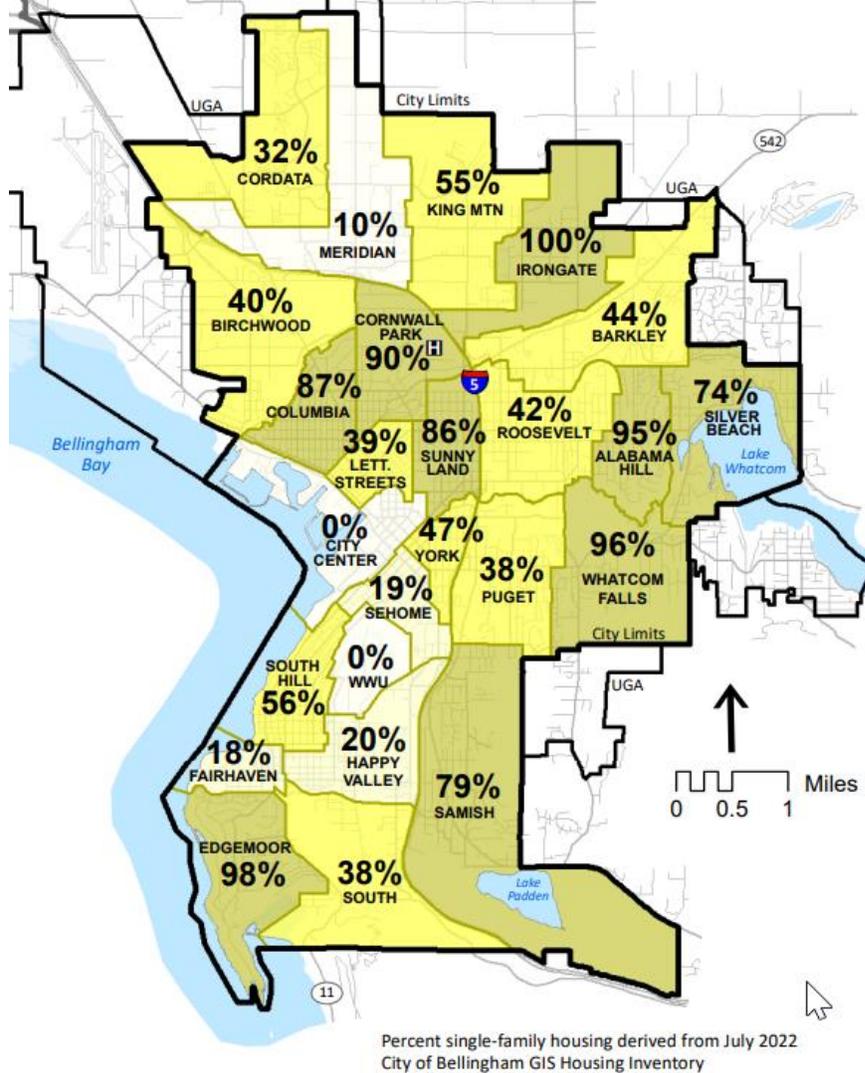
- d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

The percentage of owner-occupied and renter-occupied housing varies greatly by Census tract, from 83-85% owner-occupied in Census tracts 8.03 and 8.04 (which roughly correspond to Alabama Hill and Silver Beach neighborhoods) to 5% in Census tract 6 (City Center). In

general, the percent of owner-occupied vs. renter-occupied housing corresponds closely to the percent of single-family vs. multi-family housing. For example, the Lettered Streets is 39% single-family type housing and 33% owner-occupied.

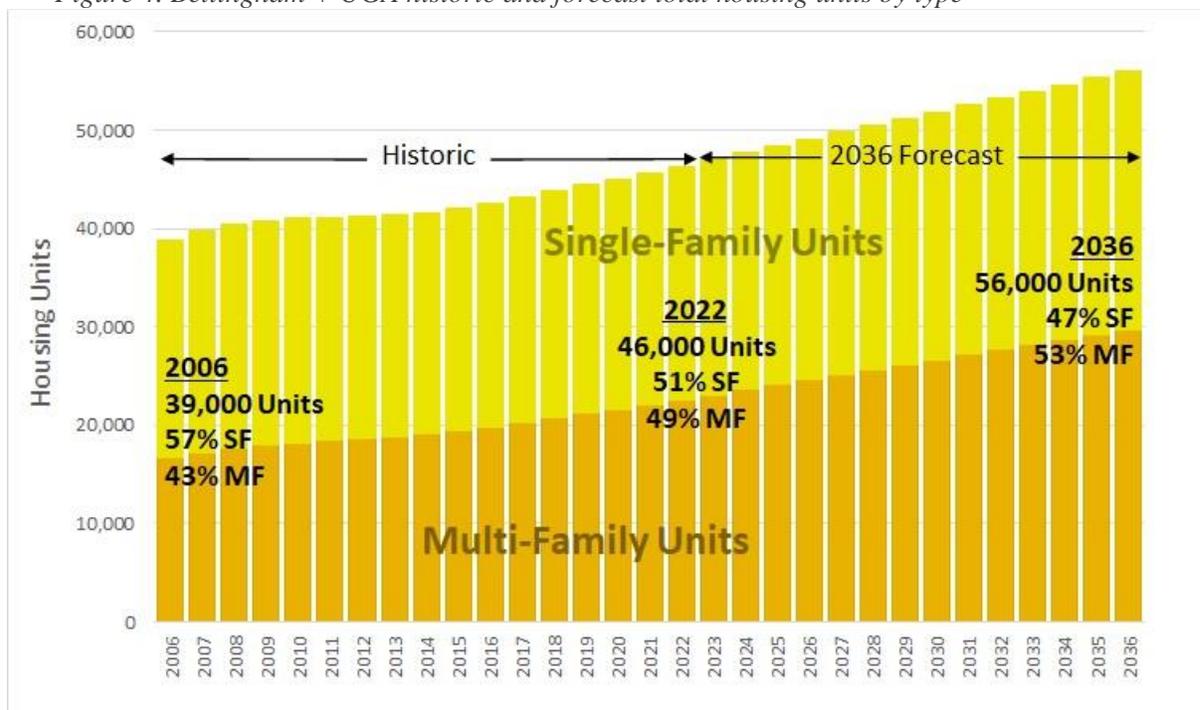
Figure 3 below shows the percent of single-family housing by neighborhood. Comparing this to the percent of non-White students in Figure 1 above, some of the neighborhoods with the highest percentage of non-White students also correspond to a higher percentage of renter-occupied housing. However, this isn't always true. For example, Happy Valley neighborhood (Census tract 12.01) has the second highest percentage of renter-occupied housing units (85%) but has just 20-30% non-White elementary students.

Figure 3. Percent of single-family housing by neighborhood



Bellingham’s housing stock has been majority single-family in the past but is moving towards a majority of multi-family housing in the future. The following graph (Figure 4) represents the trends of single- and multi-family housing over time.

Figure 4. Bellingham + UGA historic and forecast total housing units by type



- e. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.

The most prevalent form of segregation in Bellingham is economic segregation. Although the City has worked to advance policies that increase the variety of housing choices in more neighborhoods, the escalating cost of housing in Bellingham and Whatcom County (region) will continue to make it difficult for low-income persons to purchase homes and benefit from the corresponding economic gains from increasing home values.

According to the 2015-2020 American Community Survey (ACS), 20% of Bellingham residents had incomes below the poverty level. This is a decrease of 3% since the last AFH. Compared to the region, there are a higher percentage of individuals below the poverty level in Bellingham than in Whatcom County (13.9%).

Wages are increasing, but not on pace with housing prices. That means fewer families qualify for programs to assist moderate-income borrowers, such as the Kulshan Community Land Trust or down-payment assistance, while housing costs remain out of reach for many

Residents in Bellingham are highly cost burdened: 19% of all households are cost-burdened and 22% are severely cost-burdened, according to 2014-2018 CHAS<sup>2</sup> data (likely to have increased since the COVID-19 pandemic). For renters, 23% are cost-burdened, and 32% are severely cost burdened. That means 55% of renters are paying more than 30% of their income for housing. This high level of cost burden will likely mean that households earning the median income will not have funds available to save for a down payment to purchase a home in the future, keeping single-family neighborhoods increasingly occupied by higher income residents and increasing economic segregation trends.

## 2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

The [2020 City of Bellingham Residential Survey](#), prepared by faculty of Western Washington University, includes questions about public perception of fairness and equality in Bellingham. The survey is sent to a representative sample of Bellingham residents (although respondents skew toward older homeowners). When asked how the City of Bellingham was doing in terms of equitability in different aspects of support and services offered, respondents felt that Bellingham was *least* equitable with regard to:

- Housing options and affordability
- Racial/Cultural diversity
- Racial/Cultural integration

Respondents felt that Bellingham was *most* equitable with regard to:

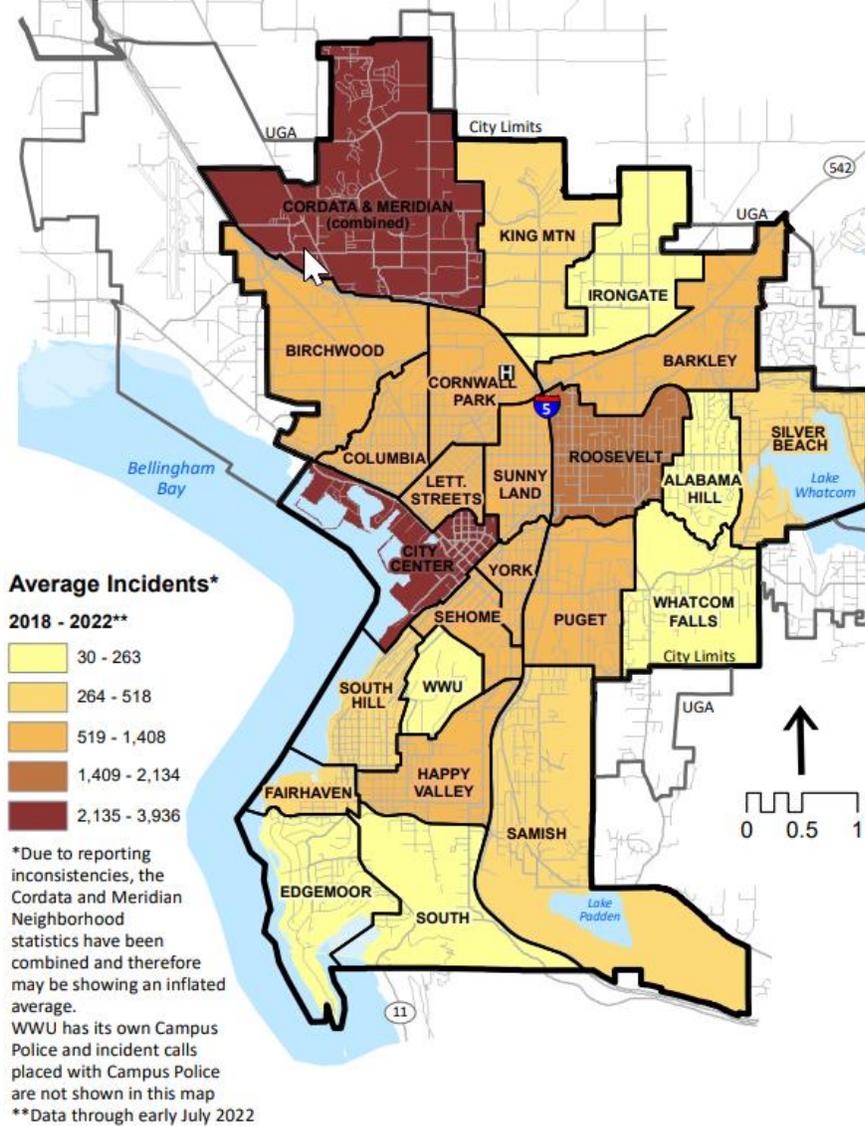
- Providing physical access to public facilities
- Supporting community celebration and events
- Providing adequate inclusive services for diverse sexual orientations

Among other issues, Neighborhood Safety was rated as the fifth most important challenge facing Bellingham, with 14% of residents rating this as the #1 or #2 biggest challenge. The map below shows crime statistics by neighborhood. The areas with the highest rates of crime are the City Center and Meridian/Cordata neighborhoods. These areas are also major commercial centers. Roosevelt also has a higher number of incidents than the city overall. This pattern is consistent with trends reported in the previous AFH, except for a higher overall rate of reported incidents.

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<sup>2</sup> Comprehensive Housing Affordability Strategy (CHAS) data, which is released by HUD using Census data from the 2015-2019 American Community Survey (ACS).

Figure 5. City of Bellingham Crime Statistics (2018-2022)



- b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and geographic mobility options for protected class groups.

Despite some of the trends reported above, Bellingham’s segregation levels remain relatively low compared to other areas of the country. The only place-based investments are described in Goal 1 from the previous Assessment of Fair Housing, which included adding a preference for new, permanently affordable housing in low-poverty neighborhoods.

### 3. Contributing Factors of Segregation

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.*

- ✓ **Community opposition**
  - Displacement of residents due to economic pressures
  - Lack of community revitalization strategies
  - Lack of private investments in specific neighborhoods
  - Lack of public investments in specific neighborhoods, including services or amenities
  - Lack of regional cooperation
  - Land use and zoning laws
  - Lending discrimination
- ✓ **Location and type of affordable housing**
  - Loss of Affordable Housing
  - Occupancy codes and restrictions
  - Private discrimination
  - Source of income discrimination
  - Other

Residential Survey respondents were asked to identify the top factors that “might lead to unequal access to opportunity or increase disparities” in Bellingham. Of the contributing factors provided by HUD, over 85% of survey respondents identified “Lack of access to opportunity due to high housing costs.” The second highest contributing factor was “Location and type of affordable housing,” which was selected by 55% of respondents. The third most-selected contributing factor was “Community opposition to affordable housing developments,” selected by 49% of respondents. Although not all of these contributing factors are directly linked to segregation, they do contribute to economic segregation, which is correlated to other types of segregation, such as racial, ethnic, age, and household type.

**ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)**

**1. Analysis**

- a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

HUD uses a threshold of 50% of non-White households and 50% households in poverty to define an area as a racially/ethnically concentrated areas of poverty (R/ECAP). HUD data, including Maps 1, 3, 4 and Table 4 for this AFH analysis, has not identified any HUD-defined R/ECAP areas in the City of Bellingham jurisdiction. There are also no HUD-defined R/ECAP areas in the region either.

City staff performed an alternative analysis using a lower threshold than HUD’s standard definition of R/ECAPs. Using a threshold of 20% of non-White households below the poverty level shows one Census Tract (Tract 3.02) with a higher concentration of ethnic diversity and poverty, and another that nearly meets these criteria (Tract 7). Although there are several Census tracts with much higher levels of poverty, only these two also have a high level of non-White (percentage of Hispanic) residents. There were no other non-White concentrations that met the 20% poverty threshold.

- b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?

HUD data, including Maps 1, 3, 4 and Table 4 for this AFH analysis, has not identified any HUD-defined R/ECAP areas in the City of Bellingham jurisdiction. There are also no HUD-defined R/ECAP area's in the region.

Using the alternative threshold, the only racial or ethnic group that reaches a threshold above 20% in any Census tract is Hispanic ethnicity. In the jurisdiction, the overall population is 8,476 Hispanic or Latino (9.3%) and 83,006 (90.7%) non-Hispanic or Latino. Individual Census tracts range from 0.00% Hispanic/Latino (Tract 9.04) to 27.38% Hispanic/Latino (Tract 7). In the region (Whatcom County), the population is 10.1% Hispanic/Latino. There are no non-White racial groups that have a concentration above 15% in any Census Tract in Bellingham.

- c. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).

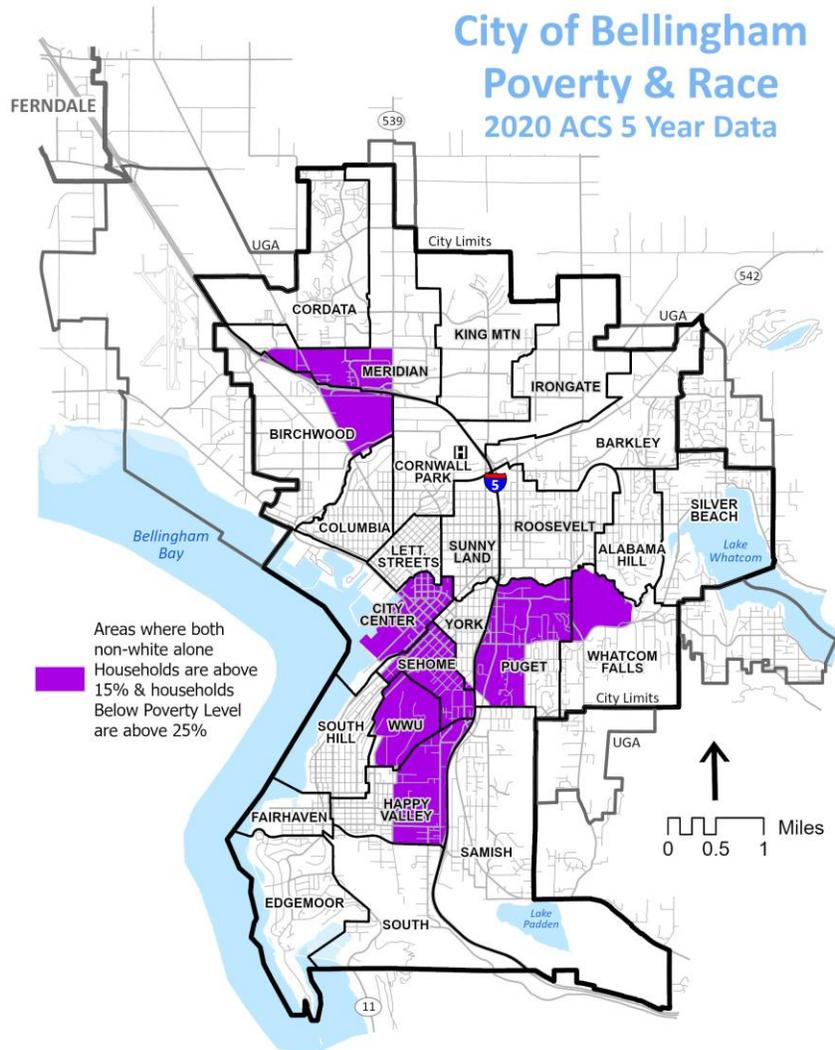
HUD data including Maps 1, 3, 4 and Table 4 for this AFH analysis has not identified any HUD-defined R/ECAP areas in the City of Bellingham jurisdiction, and there were none in the previous AFH. There are also no HUD-defined R/ECAP areas in the region. For an analysis of R/ECAPs at a lower threshold, see additional information, below.

## **2. Additional Information**

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

Because the jurisdiction does not have any areas that meet HUD's classification as a R/ECAP, an alternative analysis of all census tracts in the city was performed using a lower threshold based on the jurisdiction's averages. In 2020, the average poverty rate was 20.6% and the total percent of all non-White households was 13.8%. Areas where both non-White households are above 15% *and* households below poverty level are above 25% are shown in Figure 6. These percentage were chosen because they are significantly above the jurisdiction's average.

Figure 6. Alternative Threshold R/ECAP Analysis



Data Source: U.S. Census Bureau, 2016-2020 American Community Survey 5-Year Estimates, Tract-level data, Table ID:S2201: FOOD STAMPS/SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)

This alternative threshold analysis shows several census tracts in the jurisdiction that have both a higher-than-average concentration of low-income households and a higher-than-average concentration of minority households. These occur in the Cordata/Meridian neighborhoods in the north, and the City Center, Sehome, WWU, Happy Valley, and Puget neighborhoods in the central area of the city. The WWU neighborhood is expected to be an outlier because of the high concentration of students who fall into the poverty income level.

Using available local data on the percentage of students who receive free and reduced priced meals at school (an indicator of families with verified low-income status) showed some neighborhoods with higher rates of poverty also corresponding with a relatively higher percentage of minority households. See Figures 1, above, and 7 below.

- b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and geographic mobility options for protected class groups.

HUD data, including Maps 1, 3, 4 and Table 4 for this AFH analysis, has not identified any HUD-defined R/ECAP areas in the City of Bellingham jurisdiction. There are also no HUD-defined R/ECAP areas in the region.

All of the City of Bellingham's existing plans, including the Comprehensive Plan, parks, and transportation plans, consider geographic mobility from an equity lens, prioritizing under-served areas in the community for future investments.

### 3. Contributing Factors of R/ECAPs

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.*

- ✓ **Community opposition**
  - Deteriorated and abandoned properties
  - Displacement of residents due to economic pressures
  - Lack of community revitalization strategies
  - Lack of local or regional cooperation
  - Lack of private investments in specific neighborhoods
  - Lack of public investments in specific neighborhoods, including services or amenities
  - Land use and zoning laws
- ✓ **Location and type of affordable housing**
  - Loss of Affordable Housing
  - Occupancy codes and restrictions
  - Private discrimination
  - Source of income discrimination
  - Other

HUD data, including Maps 1, 3, 4 and Table 4 for this AFH analysis, has not identified any HUD-defined R/ECAP areas in the City of Bellingham jurisdiction. Although there are also no HUD-defined R/ECAP areas in the region, our community survey respondents were asked to identify the top factors that “might lead to unequal access to opportunity or increase disparities” in Bellingham. Of the contributing factors provided by HUD, over 85% of survey respondents identified “Lack of access to opportunity due to high housing costs.” The second highest contributing factor was “Location and type of affordable housing,” which was selected by 55% of respondents. The third most-selected contributing factor was “Community opposition to affordable housing developments”. Although not all of these contributing factors are directly linked to segregation, they do contribute to economic segregation, which is correlated to other types of segregation, such as racial, ethnic, age, and household type.

**iii. Disparities in Access to Opportunity**

**1. Analysis**

**a. Education**

- i. For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.

There are 22 schools in the Bellingham Public School District. Fourteen elementary schools, four middle schools, and four high schools. In the Whatcom County region there are eight public school districts.

School proficiency measurements are based on test scores of 4th grade students. A review of HUD Table 12 jurisdictional data reveals that Bellingham's total population school proficiency index shows Hispanic persons receiving the lowest score of 48.65, and Native American, non-Hispanic students receiving the second lowest score of 49.97. Asian or Pacific Islander, non-Hispanic Students received a score of 52.90, Black, non-Hispanic students received a score of 55.18, and White, non-Hispanic students received a score of 57.62.

In HUD Table 12, the School Proficiency Index regional scores reveal that within Whatcom County's total population, Native American, non-Hispanic persons have the lowest school proficiency index of 29.60. Hispanic students have the next lowest index of 47.03. Asian or Pacific Islander, non-Hispanic students, Black, non-Hispanic students, and White, non-Hispanic students follow, with scores of 50.05, 50.41, and 50.47, respectively. The most significant difference between scores in Bellingham and Whatcom County is that proficiency among Native American, non-Hispanic students in the County are 20 points lower than in Bellingham.

- ii. For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.

In general, the population of families with children is far more diverse than the city of Bellingham as a whole. About 35% of families with children are non-White and/or Hispanic. By comparison, the city-wide population was 16% non-White and/or Hispanic over the same time-period.<sup>3</sup> The proportion of minority families with children are almost double that of the general population.

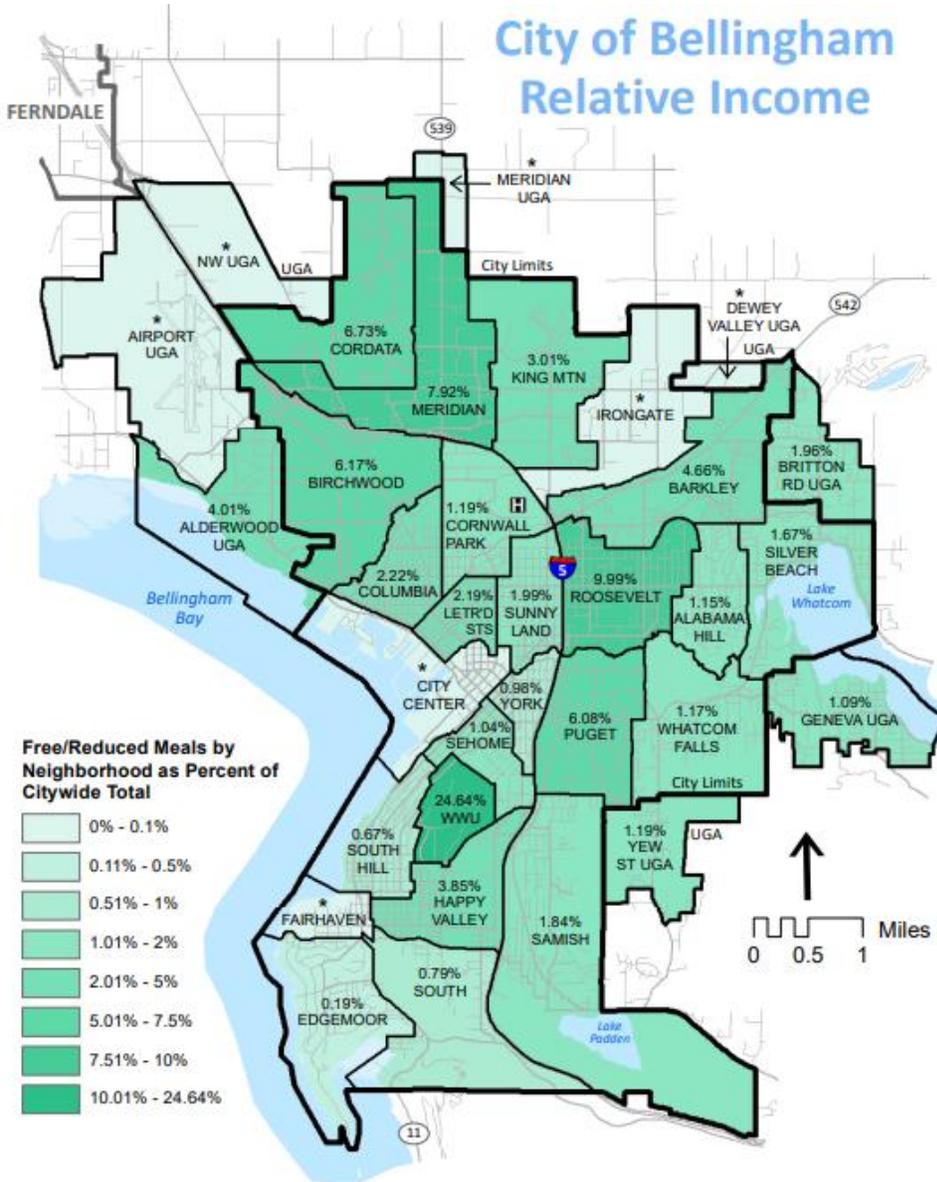
Low-income families are not distributed equally throughout the city. Using available local school district data on the percentage of students who receive free and reduced priced meals (an indicator of families with verified low-income status), shows some neighborhoods with higher rates of poverty also correspond with a relatively high percentage of minority households. The most pronounced example is the Roosevelt neighborhood, which corresponds closely with Bellingham's Census Tract 7. Although the neighborhood makes up only 3% of the total school district enrollment, the students living in that neighborhood/tract make up 10% of the total number of students receiving free or reduced-price meals (see Figure 7 below). Cordata and

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<sup>3</sup> US Census. 2020 American Community Survey (ACS) 5-year estimates.

Birchwood elementary schools also each account for 3% of total enrollment yet have over 6% of students who qualify for free or reduced-price meals.

Figure 7. City of Bellingham Relative Income



Map shows 2022 Bellingham School District Free/Reduced Meals Program enrollment by neighborhood and urban growth area (UGA) expressed as percentage of total enrollment in program citywide. Percentage values for neighborhoods with an asterisk (\*) are not shown due to record counts below allowed reporting thresholds. For WWU the number of on-campus students eligible for Pell grants was used as a proxy for Free/Reduced Meals eligibility.

- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant’s own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.

In addition to the public elementary and secondary schools, Bellingham has a community college, technical college, and major public university. All these schools are proficient and are

dispersed throughout the community for equal access. In recent years, the Bellingham School District has made efforts to redraw its attendance areas to better distribute attendance by ethnicity and household income.

**b. Employment**

- i. For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

In HUD Table 12, the Jobs Proximity Index jurisdictional scores reveal that in the total population, White, non-Hispanic persons have the lowest job proximity index of 73.79. Black, non-Hispanic persons have the next lowest index of 75.06. Asian or Pacific Islander, non-Hispanic, Native American, non-Hispanic, and Hispanic persons follow, with scores of 76.83, 78.19, and 78.35, respectively.

Regionally, the job proximity index for Native American, non-Hispanic persons is the lowest score at 43.89, followed by White non-Hispanic persons at 49.21. For Hispanic persons, the index is 50.54. For Black, non-Hispanic persons, the score is 57.70, and for Asian or Pacific Islander, non-Hispanic persons, the regional score is 60.16. Based on the Table 12 Jobs Proximity Index scores, it appears that all protected classes are able to access jobs at a higher rate in the jurisdiction than in the region.

- ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.

The City of Bellingham has 6 official urban villages,<sup>4</sup> which are a major growth strategy within the Comprehensive Plan.<sup>5</sup> These urban villages are designed to be dense, walkable urban centers with access to employment, education, and housing. Figure 8 below shows the City's current and potential urban villages. These villages revolve around historic commercial centers and current centers of education and employment, such as the City's three colleges and universities.

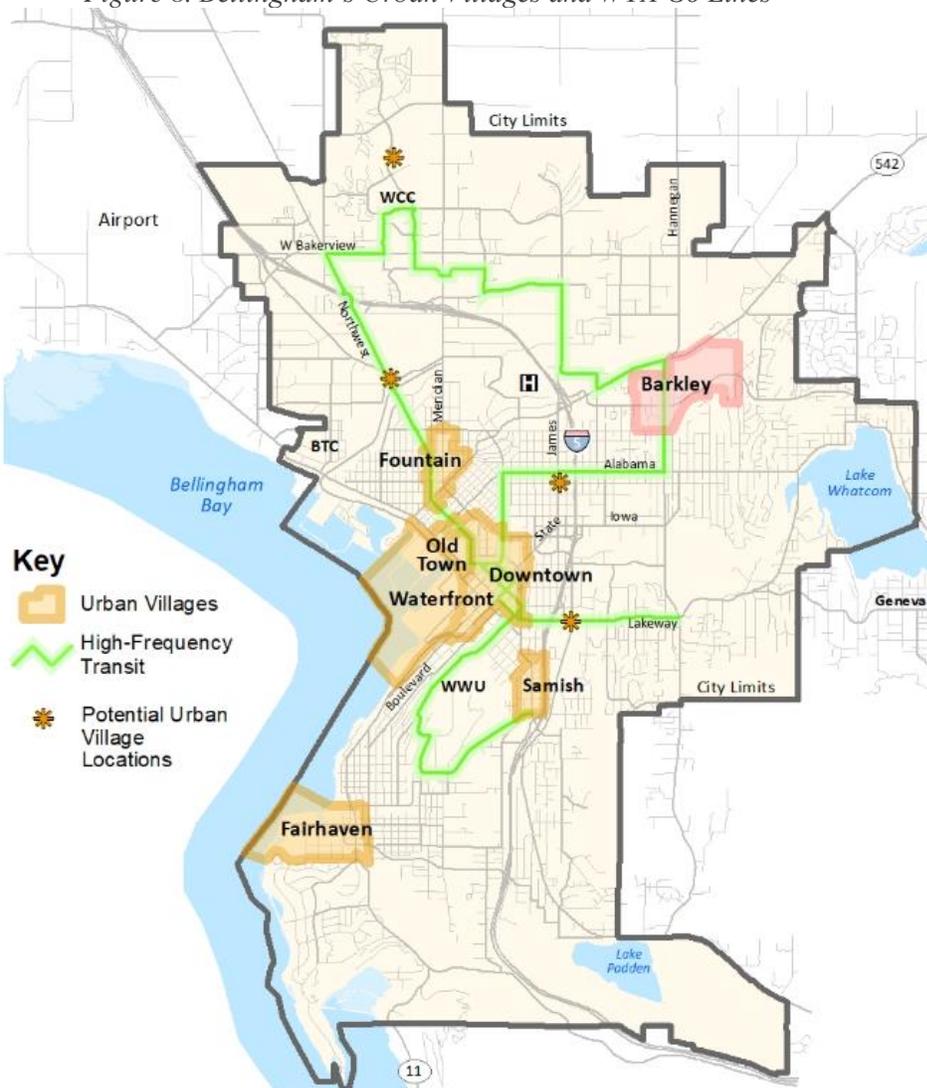
The Comprehensive Plan and supporting transportation planning policies work to ensure that no matter where someone lives in Bellingham, they have access to employment centers. While some urban villages are more developed than others, comparing the location of urban villages to population and housing data does not reveal any disparities in access to employment.

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<sup>4</sup> See <https://cob.org/services/planning/urban-villages> for more information on the City's urban villages.

<sup>5</sup> See <https://cob.org/services/planning/comprehensive-plan> for more information, or to read the 2016 Comprehensive Plan. This plan will be updated again in 2025.

Figure 8. Bellingham's Urban Villages and WTA Go Lines



- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.

In the City's public Housing Equity Survey, respondents were asked to select the top factors that contribute to unequal access to opportunities. "Location of employers" was ranked 11<sup>th</sup> out of 15 contributing factors, selected by just 14% of respondents. This public perception reflects the City's intention to implement policies that connect housing and transportation options with employment centers provide benefits to all residents, regardless of race, ethnicity, or income.

### c. Transportation

- i. For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.

The Low Transportation Cost Index in HUD Table 12 measures cost of transport and proximity to public transportation by neighborhood. The higher the index, the lower the cost. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The higher the index, the more likely residents of a neighborhood will access public transportation.

In Bellingham (jurisdiction) and Whatcom County (region), Whatcom Transportation Authority (WTA) oversees the regional transportation system, including public bus services, fixed routes, and paratransit services for people whose disability prevents them from riding fixed route buses. Zone service provides limited transit services to rural areas of Whatcom County. The Vanpool program allows groups of people to lease a WTA-owned van for commuting to and from a common worksite. Whatcom County's rural areas have limited transportation services due to the low population density.

A review of the city of Bellingham (jurisdiction) Table 12, Low Transportation Cost Index for the total population indicates that Asian or Pacific Islander, Non-Hispanic have the lowest index (highest cost) at 53.88, followed by the White, non-Hispanic population at 53.95. Of the population below the poverty line, virtually all of the population is similar with an average of 57.83 in the jurisdiction. In Whatcom County (region) Table 12 Low Transportation Cost index for the total population indicates that Native American, Non-Hispanic households have the lowest index (highest cost) of 35.55 in the region, followed by Hispanic households with a score of 39.78.

The Transit Trips index shows that the White, non-Hispanic households have the lowest transit index (less likely to use) at 66.02 in the jurisdiction. Asian or Pacific Islander, non-Hispanic households at 66.74, Hispanic households 69.26, Black, non-Hispanic households at 69.76 and Native American, non-Hispanic households at (most likely to use) 70.65. It appears that Native Americans are most likely to use public transit and White households are least likely to use public transit in the jurisdiction.

The population below the poverty line in the jurisdiction indicates that Hispanic population is least likely to use transit, having the lowest score at 70.05, and Black non-Hispanic households are most likely to use public transit with a score of 77.36. The second group most likely to use transit are Asian or Pacific Islander at 72.61, Native American, non-Hispanics at 71.68, and White, non-Hispanic at 71.13.

In the region, of the population below the federal poverty line, the group least likely to use transit is Hispanics at 60.40, the second least likely to use transit is White, non-Hispanics at 60.92, third being Native American, non-Hispanic households at 63.59, and Asian or Pacific Islander households are fourth least likely to use transit at 66.23. Black non-Hispanic households are most likely to use public transport with a rating of 72.81.

- ii. For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.

See response to question b.ii and Figure 8 above.

- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there

are programs, policies, or funding mechanisms that affect disparities in access to transportation.

City-wide multi-modal plans for bike, pedestrian, and public transportation seek to connect residential areas to services, education, and employment opportunities. Equity is a focus of all transportation plans and funding. “Transportation Fund projects are primarily focused on upgrades in lower-income neighborhoods with higher needs for sidewalks, bikeways, and transit service. Since 2010, the Transportation Fund has allowed the City to make almost 70% of all pedestrian improvements and over 75% of all bicycle improvements in lower-income neighborhoods in Bellingham.”<sup>6</sup>

The City’s public Housing Equity Survey asked respondents to select the top factors that contribute to unequal access to opportunities. “Availability, type, frequency, and reliability of public transportation” was ranked 4<sup>th</sup> out of 15 contributing factors, selected by 32% of respondents. This indicates that, while the City continues to prioritize bike and pedestrian improvements in low-income neighborhoods, public transit options are still inadequate to serve the public’s perceived need.

**d. Access to Low Poverty Neighborhoods**

- i. For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

The Low Poverty Index in HUD Table 12 uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood, a higher score generally indicates less exposure to poverty at the neighborhood level. In the City of Bellingham jurisdiction, Hispanic households have the most exposure to poverty based on the lowest index score of 41.35, followed by Native American, non-Hispanic households with a score of 41.38. The next protected class with the third highest exposure to poverty is the Black, non-Hispanic households with a score of 43.83. White, non-Hispanic households have the least exposure to poverty in the jurisdiction with a score of 51.23. For all ethnic/racial groups (with the exception of Native American, non-Hispanic households, who have a regional score of 35.56) the Low Poverty Index is higher (better) in the region compared to the jurisdiction.

For the population in the jurisdiction living below the poverty line, there is a slightly different order. Black, non-Hispanic have a score of 35.90, second is Native American, non-Hispanic at 38.25, Asian or Pacific Islander, non-Hispanic at 43.16, and White, non-Hispanic at 46.46. At 51.88, the Hispanic population has the least exposure to poverty. For the population in the region below the poverty level, Native American households score even lower than within the jurisdiction, at 34.77.

- ii. For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region.

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<sup>6</sup> More information about the City of Bellingham Transportation Fund’s priorities and outcomes can be found at: [Bellingham Transportation Fund \(arccgis.com\)](http://arccgis.com).

There are areas in the jurisdiction that do not permit the building of multi-family housing developments or affordable housing developments in their neighborhoods, either through present zoning codes or community opposition. With dramatically escalating housing prices, the lack of availability of affordable and accessible housing units in these neighborhoods may affect the ability of protected class groups to access low-poverty areas. Moreover, currently high-poverty areas may continue to see increased rent and housing prices, leading to displacement of low-income residents.

- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.

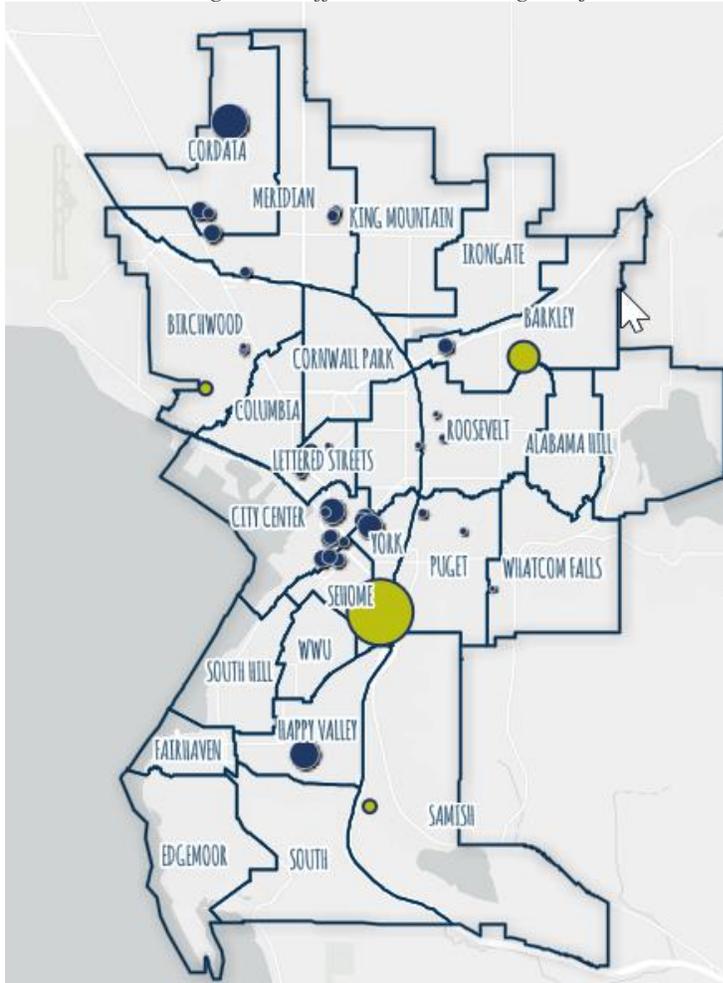
In the 2017-2022 Assessment of Fair Housing and the 2018-2023 Consolidated Plan, the City of Bellingham set the priority of increasing the amount of permanently affordable housing in high-income (low poverty) neighborhoods. Since those plans were adopted, new low-income housing projects are in progress or under development in high-income areas: Barkley (Trail View) and Waterfront (Millworks), two low-poverty neighborhoods that were previously lacking any subsidized housing projects. Both received City funding.

Despite this, most permanently affordable housing remains concentrated in the Downtown/City Center and north end of the city. There are only two low-income housing projects in the southern part of the city, further creating economic segregation. See Figure 9 below, which shows the location of all housing projects to which the City has contributed funding. Recently funded projects are shown in green, and the size of the dot corresponds to the number of units.<sup>7</sup>

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<sup>7</sup> An interactive map and detailed information about each project can be found at [Housing & Human Services \(arcgis.com\)](#).

Figure 9. Affordable Housing Projects in Bellingham



Among Housing Equity community survey respondents, “Land use and zoning laws” was ranked the 5<sup>th</sup> of 15 factors that influence equitable access to opportunities, selected by 28% of survey respondents. This contributing factor may partially explain why affordable housing for low-income individuals is concentrated in areas which allow for denser multi-family developments. Refer to Figure 3 for the percentage of single-family housing by neighborhood.

**e. Access to Environmentally Healthy Neighborhoods**

- i. For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

The environmental health index listed in HUD Table 12 indicates the health of a neighborhood based on exposure to air pollution. The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory, and neurological toxins by neighborhood. A higher Environmental Health Index indicates a better environmental health level or less exposure to toxins harmful to human health.

In general, scores in the jurisdiction range from 34.86 to 31.45 among racial groups; not a wide disparity. The Native American, non-Hispanic population has the least exposure to harmful toxins, with a score of 34.86. In the region, the Hispanic population has the least exposure to harmful toxins, with a score of 46.03. All races and ethnicities have a high environmental health index in both the jurisdiction and the region, with little variation between groups.

- ii. For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.

There is very little disparity between groups in access to environmentally healthy neighborhoods.

- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.

Among Housing Equity community survey respondents, "Location of environmental hazards" was ranked the 15<sup>th</sup> of 15 factors that influence equitable access to opportunities, selected by just 5.7% of survey respondents. This is not an issue that significantly affects access to opportunities in the public perception.

#### **f. Patterns in Disparities in Access to Opportunity**

- i. For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region.

Bellingham (jurisdiction) has no identifiable overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin, or familial status, according to the data provided by HUD. The jurisdiction has no HUD-identified R/ECAPs and no protected classes that are either moderately or highly segregated.

- ii. Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.

Despite not having any areas that experience segregation, poverty, or lack access to opportunities on a scale considered significant according to national standards, the city does have a few areas that appear several times when analyzing local data sources. Specifically, Census Tract 3.02, which is at the intersection of Meridian, Cordata, and Birchwood neighborhoods, appears several times.

## **2. Additional Information**

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

Although not a Federally protected class, low-income renters in Bellingham report high rates of source-of-income discrimination, which is a protected status in both the State and Bellingham municipal code. 87% of surveyed housing professionals who work with low-income tenants receiving housing assistance said they had had a client who faced discrimination due to the source of income, and many provided examples. This type of discrimination, while prohibited, is difficult to investigate or enforce.

- b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

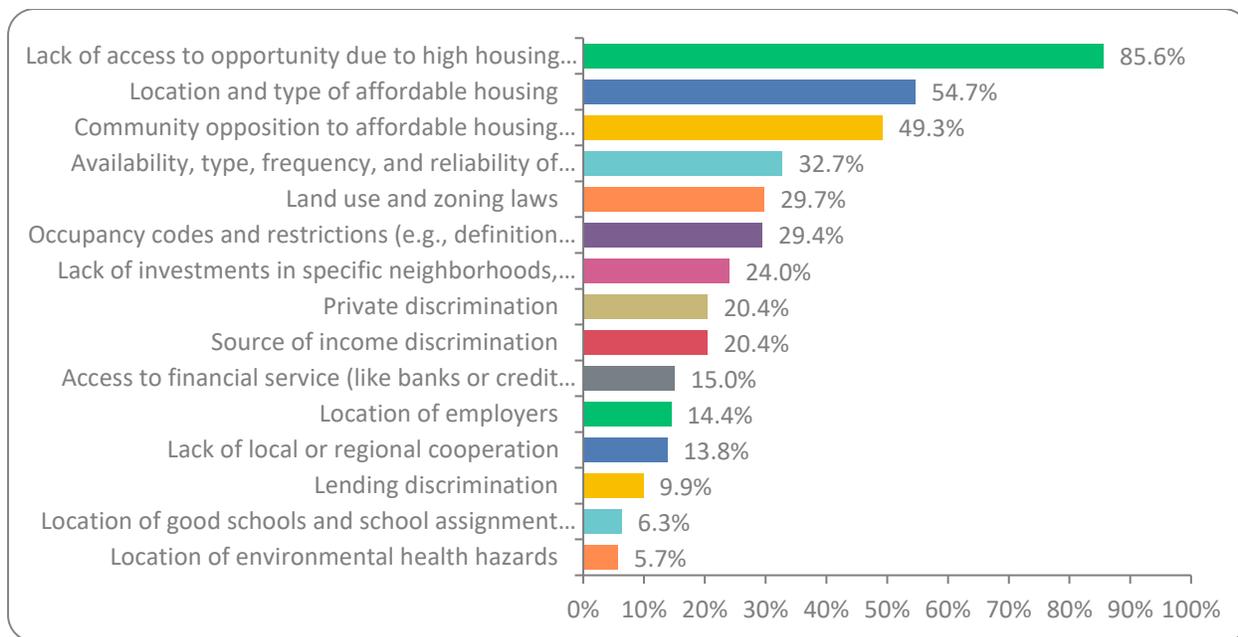
### 3. Contributing Factors of Disparities in Access to Opportunity

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.*

- Access to financial services
- Availability, type, frequency, and reliability of public transportation
- Impediments to mobility
- ✓ **Lack of access to opportunity due to high housing costs**
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- ✓ **Location and type of affordable housing**
- Location of employers
- Location of environmental health hazards
- Location of proficient schools and school assignment policies
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Other

Figure 10 illustrates that the top factor that creates disparities is the lack of access to opportunity due to high housing costs, followed by the location and type of affordable housing, according to community survey respondents. This feedback aligns with other local data sources and knowledge. High housing costs are the greatest current challenge in the jurisdiction and region.

*Figure 10. Community survey responses: Top factors that might lead to unequal access to opportunity.*



The top two priorities were consistent, even when respondents were sorted based on race, ethnicity, family type, and income. Lack of access to opportunity due to high housing costs and location and type of affordable housing were selected as the top contributing factors by the majority of low-income respondents, non-White and multiracial, Hispanic and non-Hispanic respondents, and families with and without children.

**iv. Disproportionate Housing Needs**

**1. Analysis**

- a. Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing problems (cost burden, overcrowding, or substandard housing) when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing cost burdens when compared to other groups?

In the jurisdiction, according to CHAS data, out of renter-occupied households, 100% (55 of all 55) Pacific Islander, non-Hispanic households experience any of the four housing problems. This is the highest rate of experiencing housing problems by racial/ethnic group. The second highest rate of households who experience any of the four housing problems by racial/ethnic group is Hispanic households, at a rate of 67% (1130 of all 1675). Households experiencing the third highest rate of housing problems is American Indian/Alaskan Native, non-Hispanic (64%, 220 out of 345 households), and households experiencing the fourth highest rate are Black, non-Hispanic (61%, 185 out of 305 households).

White, non-Hispanic households experience housing problems at a rate of 56% (8,655 out of 15,460 households), and Asian, non-Hispanic group has the lowest rate (51%, 465 out of 915 households). The total number of renter-occupied households with problems in Bellingham is 10,710 out of 18,755 households, 57%.

In Bellingham, owner-occupied households have a dissimilar breakdown of households who experience housing problems by racial/ethnic group. Housing Problems in the jurisdiction are highest among American Indian/Alaskan Native households at 70%, followed by Hispanic households at 47% of households, and Asian, non-Hispanic households 34% of owner-occupied households in the jurisdiction with housing problems.

Disproportionate Cost Burden in the jurisdiction for households in renter-occupied housing by household type and size are highest for elderly non-family households at 68% (1,655 of 2,425 total households) in this category, with 47% total of elderly nonfamily households experiencing severe cost burden (cost burden >50%). The second highest rate is for nonelderly, non-family households at 60% (with 36% experiencing severe cost burden). Small family households (family households with no more than two members) had the lowest rate, with 40% of households experiencing cost burden out of 4,600 households in this category.

In the region, the group with the highest rate of housing problems in renter-occupied households is the Pacific Islander, non-Hispanic group as well, with 82% (63 out of 77 households) of households in this group experiencing at least 1 housing problem. The second highest group is the Hispanic population, with 67% reporting housing problems (or 2,055 of 3,080 households). The third highest rate of housing problems is the Black, non-Hispanic households, with a rate of 57% (or 195 of 345 households) with housing problems.

Severe cost burden in renter-occupied households for the region is highest among Black, non-Hispanic households with a rate of 53% (180 out of 340 households). Pacific Islander, non-Hispanic households experience severe cost burden at the second highest rate, with 50%, (40 of 80 households) reporting severe cost burden.

Disproportionate Cost Burden in the region for households in renter-occupied housing are again highest for elderly non-family households at 64% of households in the category (2,810 of 4,390 households, with 42% experiencing severe cost burden). Regionally, the second highest rate is for nonelderly, non-family households at 57% (with 34% experiencing severe cost burden). Small family households (family households with no more than two members) had the lowest rate in Whatcom County, with 40% of households experiencing cost burden (17% of which experience severe cost burden).

- b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

HUD Map 6, Housing Burden by Race/Ethnicity, shows that the jurisdiction and the region are both predominantly White, with no areas of minority concentration. On Map 6 for the jurisdiction, the darkest shaded areas represent the Lettered Streets and Happy Valley neighborhood, City Center, Sehome and WWU. Although the City of Bellingham has shown that there are no R/ECAPs in the jurisdiction or the region, these neighborhoods are also the same that are highlighted in Figure 6 as having an above-average concentration of both high-poverty and non-White households in our alternative analysis.

- c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.

HUD Table 9 indicates that 30.3% of family households in the jurisdiction with housing problems have less than 5 members and 45.4% of family households in the jurisdiction with housing problems have more than 5 members. In the jurisdiction, 52.97% of non-family households have housing problems.

In the region, 28.33% of households with less than 5 people and 46.2% of households with 5 or more members have housing problems. In this region, 49.1% of non-family households have housing problems. In both the jurisdiction and region, households with 5 or more members have more housing problems.

Publicly Supported Housing Table 11 indicates that in Public Housing units, 13.6% of households have children. Of all public housing units, 76.5% are efficiency or 1-bedroom units. 16.6% are 2-bedroom units and 7% of the units are 3 or more bedrooms in size. Accordingly, the 23.6% of total units that have two or more bedrooms should be adequate to accommodate the 13.1% of households with children.

Table 11 also shows that Project-based Section 8 units are 23.4% occupied by households with children. Of the Project-based Section 8 units, 92 units (67.2%) are efficiency or 1-bedroom units, 34 units (24.8%) are 2-bedroom units, and 6 units (4.4%) are 3-bedroom units.

There are zero other multi-family units listed on Table 11. Table 11 also shows that of all the Housing Choice Voucher (HCV) program participating households, 27.3% have children, and 53.7% of HCV units are efficiency to 1-bedroom units, 30.4% of HCV units are 2-bedroom units and 15.9% of the units are 3+ bedrooms.

- d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

In the jurisdiction, 54% of units are renter occupied and 46% are owner occupied, per CHAS data. Overall, the jurisdiction was 86% White and about 14% non-White. However, of the owner-occupied housing units in Bellingham, only 10% were occupied by non-White householders. By contrast, 18% of the renter-occupied households in the jurisdiction are non-White. The Black, non-Hispanic population of the jurisdiction make up less than 1% of the owner-occupied households in the jurisdiction, and while Hispanic householders make up 7% of the jurisdiction, they only make up 4% of owner-occupied households (and by contrast, make up 9% of renter-occupied households).

In the region, similar patterns emerge. 37% of units in Whatcom County are renter-occupied and 63% of units are owner-occupied. Overall, the region was 87% White and about 13% non-White. Only 9% of owner-occupied units in Whatcom County were occupied by non-White householders even though 13% of the region are non-White. The Black, non-Hispanic population of the jurisdiction make up less than 1% of the owner-occupied households in the region, and Hispanic householders make up 4% of owner-occupied households (and by contrast, make up 10% of renter-occupied households).

## 2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

In our region, CHAS data reveals that renters are disproportionately more cost burdened than homeowners (51% compared to 47%). Renters are not a protected group, but since non-White households are less likely to own and more likely to rent their homes, they could be disproportionately affected by housing cost burden.

There are 1,439 households in Bellingham with children and a single female head of household. Of these, 70% live below the poverty level.<sup>8</sup> This contrasts with just 10% of all family households below the poverty level, showing that single female-headed households are especially vulnerable to poverty.

According to 2019 ACS Data, American Indian/Alaska Native households purport the lowest median income; this demographic reported a median income of \$21,509. Native Hawaiian and Other Pacific Islander households report a median income of \$23,833. Households with the highest median income in Bellingham are Asian households; this demographic reports a median income on \$58,581.

- b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

## 3. Contributing Factors of Disproportionate Housing Needs

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.*

- ✓ **Availability of affordable units in a range of sizes**
  - Displacement of residents due to economic pressures
  - Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- ✓ **Lack of access to opportunity due to high housing costs**
  - Lack of private investments in specific neighborhoods
  - Lack of public investments in specific neighborhoods, including services or amenities
  - Land use and zoning laws
  - Lending discrimination
  - Loss of Affordable Housing
- ✓ **Source of income discrimination**
  - Other

City partners who work for affordable housing organizations and social support services consistently report that the lack of affordable housing choice makes it difficult for our most

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<sup>8</sup> 2021 ACS 1-year estimate Table C17010

vulnerable residents to access opportunities. Compounding the lack of affordable housing, those residents who are seeking housing opportunities using a housing choice voucher or another type of housing assistance regularly face income discrimination.

### **C. Publicly Supported Housing Analysis**

#### **1. Analysis**

##### **a. Publicly Supported Housing Demographics**

- i. Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction?

HUD Table 6 indicates that in the jurisdiction, 80.84% of family households in Public Housing units are White, nearly 3% are Black, 8.18% identify as Hispanic, and 5.59% identify as Asian or Pacific Islander. Households in project-based Section 8 housing follow a similar demographic breakdown; 81.06% of households identify as White, 6.82% identify as Hispanic, another 6.82% identify as Asian or Pacific Islander, and 3.79% of households identify as Black. Households participating in the HCV program consist of 81.06% White households, 7.50% Hispanic households, 5.44% Black households, and 2.81% Asian or Pacific Islander households. There are only 20 households residing in housing units in the “Other Multifamily” category, but of these 20 households, 70% identify as White, 0% identify as Black, 10% identify as Hispanic, and 20% identify as Asian or Pacific Islander.

- ii. Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.

In the region, HUD Table 6 indicates that 81.4% of family households in Public Housing units are White, 2.8% identify as Black, 8.6% identify as Hispanic, and 5.22% identify as Asian or Pacific Islander. Households in Project-based Section 8 housing follow a similar demographic breakdown; 82.6% of households in PBS8 housing identify as White, 2.39% of households identify as Black, 7.9% identify as Hispanic, and 5.46% identify as Asian or Pacific Islander. Households participating in the HCV program consist of 80.9% White households, 4.9% Black households, 8.7% Hispanic households, and 2.5% Asian or Pacific Islander households. There are only 20 households residing in housing units in the “Other Multifamily” category, and the demographic breakdown follows the same breakdown as the jurisdiction (70% identify as White, 0% identify as Black, 10% identify as Hispanic, and 20% identify as Asian or Pacific Islander).

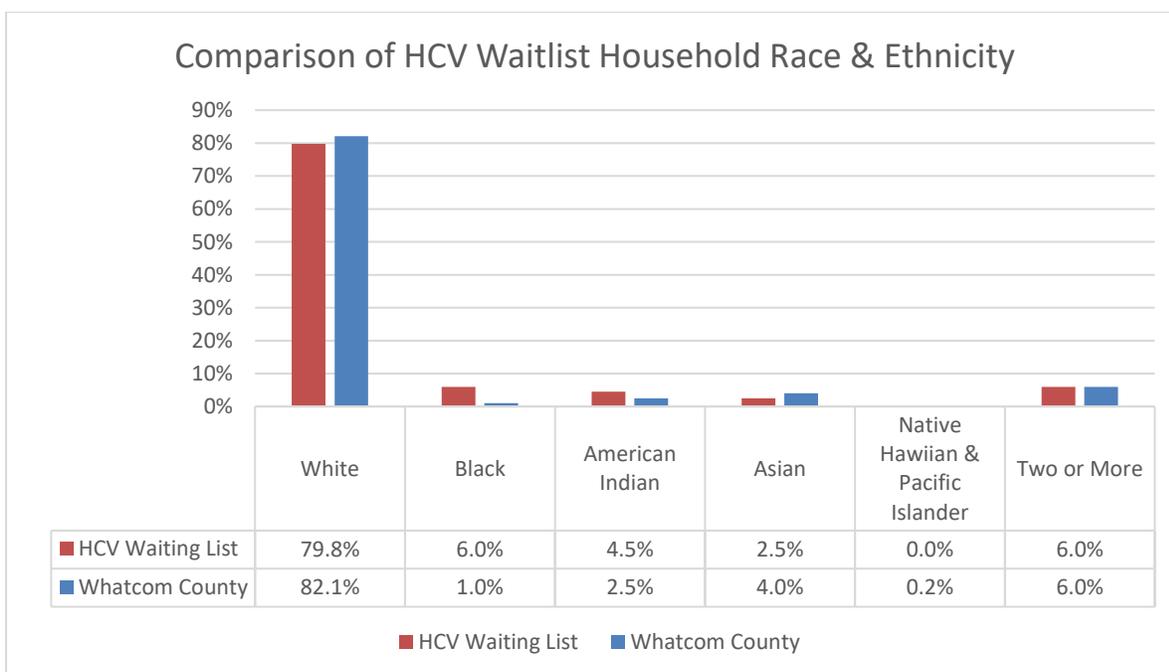
- iii. Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a

description of whether there is a higher or lower proportion of groups based on protected class.

The racial demographics of residents of public housing, project-based voucher programs, and tenant-based voucher programs are compared below. In general, residents of these programs are reflective of the residents of Whatcom County. There are a few exceptions, such as White households overrepresented in public housing and tenant-based voucher (HCV) programs. Black households are over-represented in all projects, especially Project-Based Vouchers. Households who identify as two or more races are underrepresented in all programs, especially public housing.

Head of Household Race	Whatcom County	Public Housing	Project Based Voucher	Tenant Based Voucher
White	82.1%	89.7%	81.8%	87.4%
Black	1.0%	3.1%	7.1%	3.9%
American Indian/Alaska Native	2.5%	2.1%	4.0%	2.9%
Asian	4.0%	4.1%	3.0%	1.9%
Native Hawaiian/Pacific Islander	0.2%	1.0%	1.0%	1.0%
Two or More	6.0%	0.0%	3.0%	2.9%

The demographics of HCV waitlist are similar to those of the Whatcom County region by race and ethnicity. The table below shows a comparison. Households on the waitlist who identify as Black and American Indian/Alaska Native are over-represented compared to the demographics of Whatcom County, while households who identify as Asian are under-represented.



**b. Publicly Supported Housing Location and Occupancy**

- i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.

The City of Bellingham (jurisdiction) and Whatcom County (region) has no HUD identified R/ECAP areas and low segregation according to HUD Table 3. Maps 5 and 6 indicate that publicly supported housing in all categories is distributed throughout the populated areas of the jurisdiction.

- ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.

Not applicable.

- iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?

Not applicable.

- iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.

The Bellingham Housing Authority has no RAD projects at this time. LIHTC developments in the jurisdiction and the region do not have a significantly different demographic composition.

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.

No other information is available at this time.

- v. Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

Neither the jurisdiction nor the region have any developments that are occupied largely by the same race/ethnicity. There are no areas within the jurisdiction that primarily serve only families with children, elderly, or persons with disabilities. Housing provided for these groups is interspersed throughout the jurisdiction and in populated areas of the region.

**c. Disparities in Access to Opportunity**

- i. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

Neither the jurisdiction nor the region have any developments that are occupied largely by the same race/ethnicity. There are no areas within the jurisdiction that primarily serve only families with children, elderly, or persons with disabilities. Housing provided for these groups is interspersed throughout the jurisdiction and in populated areas of the region. For example, projects may have units set aside specifically for disabled residents, large households, homeless-on-entry, or elderly applicants. None of these demographics are concentrated in a specific area of the jurisdiction or region.

**2. Additional Information**

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

HUD Table 6 does not include Native American or Alaska Native population demographics for public housing residents in the jurisdiction or region. Local data from the Bellingham/Whatcom County Housing Authority shows that residents identifying as American Indian/Alaska Native make up 3.2% of the residents of all programs. American Indian/Alaska Native households make up 1.2% of households in the jurisdiction, so this population is over-represented among PSH programs.

- b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or geographic mobility programs.

No other relevant information is available at this time.

**3. Contributing Factors-of Publicly Supported Housing Location and Occupancy**

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.*

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- Community opposition
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Impediments to mobility
- ✓ **Lack of access to opportunity due to high housing costs**
- Lack of meaningful language access
- Lack of local or regional cooperation
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities
- ✓ **Land use and zoning laws**
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Quality of affordable housing information programs
- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
- ✓ **Source of income discrimination**
- Other

#### **D. Disability and Access Analysis**

##### **1. Population Profile**

- a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

HUD data including Maps 1, 3, 4 and Table 4 for this AFH analysis has not identified any HUD-defined R/ECAP areas in the City of Bellingham jurisdiction or in the region.

- b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.

A review of Map 14, disability by type, reveals that persons with disabilities live throughout the jurisdiction with no concentration in any areas. In the region, the population of disabled persons is living with the general population with no concentrated areas.

Map 15 reveals that persons with disabilities by age group show no concentrated areas in the jurisdiction or the region.

##### **2. Housing Accessibility**

- a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

HUD has provided no data for this question at the time of this analysis. Although general building codes requires a certain percentage of accessible units, ample evidence shows that there is no

sufficient affordable housing in general, including accessible housing in a range of unit sizes. For example, the current Bellingham Housing Authority waiting list for public housing has 883 households on the list, and of those 342 households (38.7%) are disabled.

- b. Describe the areas where affordable accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?

The City of Bellingham has no R/ECAPs or other segregated areas. As discussed in previous sections, there is a shortage of affordable housing, but the City has prioritized the development of new affordable and subsidized housing throughout the jurisdiction..

- c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?

Table 15 indicates that persons with disabilities are able to access publicly supported housing in the jurisdiction and in the region. In all categories (public housing, Project-based Section 8, HCV and other multi-family programs) within the jurisdiction, persons with disabilities make up over 25% of program participants compared with about 20% of people in the jurisdiction who have a disability. In Public Housing programs, people with disabilities make up 64% of residents. This indicates that public housing assistance is being prioritized for people with disabilities.

### **3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings**

- a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

HUD Map 5 reveals that publicly Supported Housing is distributed through the jurisdiction and in populated areas of the region. Based on the limited data, it appears that persons with disabilities are residing in integrated areas of the jurisdiction and the region.

- b. Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.

Northwest Regional Council, Sean Humphry House, Sun Community Services, and others provide housing and/or support services for adults with disabilities (such as mobility disability, AIDS/HIV, and mental health). The community still has a shortage of adult family homes and other residential settings for adults, especially adults with developmental disabilities whose families can no longer care for them.

### **4. Disparities in Access to Opportunity**

- a. To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:
  - i. Government services and facilities

The City of Bellingham strives to ensure City programs, services, activities, and facilities are accessible and offer equal opportunity. The City has a designated ADA Coordinator and staff are currently going through ADA Facility Accessibility Site Survey Training.

Notice of Non-Discrimination Under Title II of the Americans with Disabilities Act is posted on the City's website ([Notice of Non-Discrimination Under Title II of the Americans with Disabilities Act - City of Bellingham \(cob.org\)](#)) and outlined below:

## NOTICE OF NON-DISCRIMINATION UNDER TITLE II OF THE AMERICANS WITH DISABILITIES ACT

General Remarks: In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973, the City of Bellingham will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment: The City of Bellingham does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication: The City will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities, so they can participate equally in the City of Bellingham's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have a speech, hearing, or vision disabilities.

Modifications to Policies and Programs: The City of Bellingham will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities.

Anyone who requires an auxiliary aid or service (e.g. an induction loop or assistive listening headset or American Sign Language interpreter) for effective communication or a modification of policies or procedures to participate in a program, service, or activity of Bellingham should email us at [ada@cob.org](mailto:ada@cob.org) or call (360) 778-7950 or 7-1-1 for relay service. Contact us as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the City of Bellingham to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

The City will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy.

Contact Information: You may contact the designated ADA Coordinator if:

- you have questions, concerns or requests for additional information regarding the Americans with Disabilities Act.
- you require an auxiliary aid or service for effective communication or a modification of policies or procedures to participate in a City program, service or activity. Please make requests as soon as possible, but no later than 48 hours before the scheduled event.
- you have a complaint that a City program, service, activity or facility is not accessible to persons with disabilities.

ADA Coordinator  
City of Bellingham  
210 Lottie Street, Bellingham WA 98225  
Voice (360) 778-7950  
FAX (360) 778-7901  
7-1-1 WA Relay Service  
[ada@cob.org](mailto:ada@cob.org)

- ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

The City of Bellingham has adopted an ADA Transition Plan ([Mobility for All - ADA Transition Plan for Pedestrian Facilities in the Public Right-of-Way - City of Bellingham \(cob.org\)](#)) for pedestrian facilities in the public right-of-way, focusing on sidewalks, curb ramps, pedestrian push buttons and other pedestrian-related facilities. The ADA Transition Plan identifies barriers and changes that are needed to ensure access for individuals with disabilities.

- iii. Transportation

Whatcom Transportation (WTA) paratransit service provides curb-to-curb and door-to-door transportation to riders whose disability prevents them from riding the fixed route bus system. The paratransit service was designed to be equal to, if not better than, the fixed route service.

- iv. Proficient schools and educational programs

All races, including those living below the federal poverty line, have access to proficient schools. Map 7, Demographics and School Proficiency, shows that all races as well as people with disabilities in the City of Bellingham jurisdiction live in close proximity to proficient schools.

- v. Jobs

Work Opportunities provides job matching services and supported employment opportunities to adults with developmental disabilities in Bellingham and surrounding areas, serving more than 100 individuals annually. In general, Census data reveals that a greater percentage of adults with a disability earn less than \$4,999 per year (31% of disabled residents compared to 13% of non-disabled residents). This suggests that employment opportunities may be limited for disabled residents.

- b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

The City of Bellingham provides a variety of accommodations and services for access and communications. If an individual with a disability requires accommodation to participate in a City program, service or activity they can complete the online accommodation request form ([Request for Accommodation Form - City of Bellingham \(cob.org\)](#)) or contact the department directly to request an accommodation.

- c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.

In the region, according to CHAS data, roughly 60% of renters have no disability limitation, whereas 63% of owner-occupied households have no disability. Regionally, 8% of renters have a hearing or vision impairment, 11% have an ambulatory limitation, 11% of renter-occupied households have a cognitive limitation, and 10% have a self-care/independent living limitation.

In owner-occupied households in the region, 9% of households have a hearing or vision impairment, 10% have an ambulatory limitation, 9% have a cognitive limitation, 9% have a self-care/independent living limitation, and 63% had no limitation.

The jurisdiction has similar demographic breakdowns of households with disabilities. In the jurisdiction, according to CHAS data, 9% of renter-occupied household have a hearing or vision impairment, 12% have an ambulatory limitation, 12% have a cognitive limitation, 10% have a self-care/independent living limitation, and 57% of households had no limitation.

In owner-occupied households in the jurisdiction, 11% of households have a hearing or vision impairment, 11% have an ambulatory limitation, 9% have a cognitive limitation, 9% have a self-care/independent living limitation, and 61% had no limitation.

## **5. Disproportionate Housing Needs**

- a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.

HUD Table 15 details disproportionate housing needs in the jurisdiction and the region for households with a member with a disability. In the jurisdiction, households with a member in the household with a disability limitation are disproportionately seeking supports from public resources; 64% of households in public housing have a member in the household with a disability limitation, 47.70% of households receiving project-based Section 8 have a member in the household with a disability limitation, 39.60% of households participating in the housing choice voucher program have a member in the household with a disability limitation, and 26% of households receiving other multifamily supports have a member in the household with a disability limitation.

Similarly, in the region, households with a member in the household with a disability limitation are disproportionately seeking supports from public resources; 57.23% of households in public housing have a member in the household with a disability limitation, 29.35% of households receiving project-based Section 8 have a member in the household with a disability limitation, 36.77% of households participating in the housing choice voucher program have a member in the household with a disability limitation, and 26.09% of households receiving other multifamily supports have a member in the household with a disability limitation.

## **6. Additional Information**

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.

No additional information at this time.

- b. The program participant may also describe other information relevant to its assessment of disability and access issues.

## 7. Disability and Access Issues Contributing Factors

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.*

- Access for persons with disabilities to proficient schools
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- Inaccessible public or private infrastructure
- **Lack of access to opportunity due to high housing costs**
- Lack of affordable in-home or community-based supportive services
- **Lack of affordable, accessible housing in range of unit sizes**
- **Lack of affordable, integrated housing for individuals who need supportive services**
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- **Location of accessible housing**
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities
- **Source of income discrimination**
- State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings
- Other

## E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. List and summarize any of the following that have not been resolved:
  - A charge or letter of finding from HUD concerning a violation of a civil rights-related law;
  - A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;

- Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;
- A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;
- A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or
- A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

The jurisdiction has two unresolved HUD civil rights violations, no cause determination from an equivalent state or local fair housing agency concerning a violation of a state or local fair housing law. These two violations are currently under review and so the details are not publicly available. There are no letters of findings issued by or lawsuit filed or joined by the Department of Justice and no False Claims Act allegations.

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

Bellingham prescribes Fair Housing Practices in Section 10 of the municipal code. Last updated in 1998, the City code protects citizens from housing discrimination based on race, color, religion, ancestry, national origin, marital status, age, familial status, disability, or sex. Because the state of Washington enforces a fair housing law that is substantially equivalent to federal law, it is not necessary for the City to consider enhancing its fair housing enforcement capacity.

**HUD Certified Substantially Equivalent jurisdiction Protected Classes**

<b>Basis</b>	<b>Federal</b>	<b>State</b>	<b>King County</b>	<b>Seattle</b>	<b>Bellingham</b>
Age			X	X	X
Ancestry			X	X	X
Breastfeeding in a Public Place				X	
Color	X	X	X	X	X
Creed		X		X	X
Familial status/Parental Status	X	X	X	X	X
Gender Identity		X	X	X	X
Genetic Information				X	
Handicap/Disability	X	X	X	X	X
Immigration or Citizenship Status				X	
Marital status			X	X	X
National origin	X	X	X	X	X
Political ideology				X	
Race	X	X	X	X	X
Religion	X	X	X	X	X
Retaliation	X	X	X	X	X

Sex	X	X	X	X	X
Sexual orientation		X	X	X	X
Section 8 recipient				X	X
Use of a Guide Dog/Service Animal		X	X		
Veteran or Military Status		X		X	X

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

The City of Bellingham provides fair housing information and outreach. A resident of Bellingham may file a complaint of housing discrimination with the following agencies:

The U.S. Department of Housing and Urban Development: Also known as HUD, the U.S. Department of Housing and Urban Development was established in 1965 to develop national policies and programs to address housing needs in the U.S. One of HUD’S primary missions is to create a suitable living environment for all Americans by developing and improving the country’s communities and enforcing fair housing laws.

The Washington State Human Rights Commission: The Washington State Legislature established the Washington State Human Rights Commission in 1949The Washington State Human Rights Commission (WSHRC) is a state agency responsible for administering and enforcing the Washington State laws against discrimination.

Fair Housing Center of Washington: The Fair Housing Center of Washington is a 501(d) nonprofit organization that has been in existence since 1981. In 1995, they became a fully operational, Qualified Fair Housing Organization. The Fair Housing Center serves western and central Washington by assisting with complaints of housing discrimination and educating housing providers and housing consumers to help prevent and address housing discrimination.

There are two jurisdictions in the State of Washington certified as substantially equivalent Fair Housing Assistant Programs (FHAP agencies). The laws of all four jurisdictions include prohibitions against discrimination in addition to those in federal law, such as marital status, sexual orientation, or income source:

- State of Washington – Human Rights Commission (WSHRC)
- Tacoma Office of Equity and Human Rights (TOEHR)

**4. Additional Information**

- a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

The jurisdiction and region’s primary source for fair housing advocacy and education resources is the Fair Housing Center of Washington. The Fair Housing Center is a HUD-designated nonprofit qualified Fair Housing Organization and serves residents of Bellingham. The Fair Housing Center is the only HUD-qualified nonprofit fair housing organization serving western Washington.

Nonprofit fair housing agencies can act as advocates for individuals that have experienced discrimination in housing by supporting them through the complaint process, conducting education, outreach, and participate in HUD-approved enforcement activities.

HUD administers the Fair Housing Act. In certain cases, HUD refers complaints to the Department of Justice (DOJ). HUD is also required to work on programs of voluntary compliance with the Fair Housing Act.<sup>9</sup> To do so, HUD enters into voluntary compliance agreements with housing industry organizations. These organizations pledge to inform the public of equal housing opportunity and the law to ensure that services are rendered equally to all clients, to publish their commitment to fair housing, and to monitor and report on the effectiveness of the agreement. The agreements for the real estate industry are called Voluntary Affirmative Marketing Agreements and for others, Best Practice Agreements.

Agreements exist with such organizations as the National Association of Realtors, National Association of Home Builders, Apartment Managers Association, and the Mortgage Bankers Association of America. Once an agreement is in effect with the national organization, state moreover, local chapters may sign on as parties to the agreement.

- b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

Bellingham residents benefit from several local nonprofit agencies that provide free or affordable legal assistance related to housing and human rights issues. The primary agencies providing fair housing enforcement and education services in Bellingham are the Fair Housing Center of Washington, HUD, and the Washington State Human Rights Commission (WSHRC). The City of Bellingham incorporates fair housing education, outreach, and enforcement into its federally funded activities.

## 5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

*Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.*

- ✓ **Lack of local private fair housing outreach and enforcement**
- ✓ **Lack of local public fair housing enforcement**
  - Lack of resources for fair housing agencies and organizations
  - Lack of state or local fair housing laws
  - Unresolved violations of fair housing or civil rights law
  - Other

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<sup>9</sup> US Congress, Title VII I, Civil Rights Act of 1968 (42 US C.3600-3620); sec 7(D). Department of Housing and Urban Development Act, 42 US C. 353S(d)

Despite the City's increased efforts at community education, and new local and state fair housing laws and other protections for vulnerable renters, the public feedback received indicated that lack of outreach and enforcement are still contributing factors. Private discrimination against source of income was the most cited violation of state and local law. This type of discrimination is difficult to document and enforce in a competitive rental housing market.

## **V. Fair Housing Goals and Priorities**

1. For each fair housing issue as analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

**Lack of access to opportunity due to high housing costs.** Housing costs in Bellingham have continued to rise dramatically over the past five years. In addition, the portion of the population renting rather than owning homes has been increasing. This has created demand for affordable, primarily rental, housing that exceeds supply. The high demand further drives up prices, and even moderate-income households cannot find a home to either rent or purchase within their price range or near their jobs, children's schools, or public transit. The salary needed to purchase a home in Bellingham is well above the area median household income. The Bellingham/Whatcom County Housing Authority has long waitlists for all its housing programs. The Kulshan Community Land Trust assists homebuyers who make 80% of the AMI or less. They currently have a waiting list of around two years for qualified, approved buyers. The major limiting factor is lack of housing stock. Although most Bellingham residents still have access to proficient schools, employment centers, and environmentally healthy neighborhoods, the high housing costs and low vacancy rates exacerbate problems such as homelessness and severe cost-burden, increasing the number of residents who rely on other public services to meet their basic needs.

**Location and type of affordable housing.** Since Bellingham does not have any R/ECAPs, segregated areas, or environmentally unhealthy areas, the location of affordable housing is not an issue as much as the type. There is a need for more affordable housing of all types – specifically for seniors, families with children, and disabled residents. Although the City's nonprofit partners have added, and continue to add, permanently affordable housing options that target these groups, the demand continues to far outpace supply. Housing Choice Voucher holders are also forced to look outside of Bellingham for more affordable housing options, which moves them further away from communities of support, services and employment centers. Federal housing programs, such as Federal Tax Credits and HOME Investment Partnership programs, have not kept pace with population growth, inflation and the high cost of construction, resulting in fewer housing opportunities for those in need.

**Availability of affordable units in a range of sizes.** The jurisdiction and regional partners strive to offer affordable units in a range of sizes, but there is still not enough available. For example, most Low-Income Tax Credit properties are one- or two-bedroom units (60%), while only 19%

have three or more bedrooms. This can mean it takes longer for larger families to find housing, even after they have qualified for public assistance. For example, the average days on the public housing waitlist for four- and five-person households is over 800 days, compared to 163 days for single-person households. In the private market, recent market studies reveal that studio and one-bedroom units are becoming unaffordable even to median-income renters, which may incentivize more non-family households to double up in larger units to save money, further increasing the demand for two- and three-bedroom units.

**Source of Income discrimination.** Because there are many qualified applicants interested in each available rental unit, property management companies and landlords can easily discriminate against applicants who have housing assistance, even though source of income discrimination is prohibited in both Bellingham municipal code and state law. In our survey of housing professionals and case managers, 87% reported having a client who had faced this type of discrimination. Agencies routinely report that it is a struggle for clients to find appropriate housing, even after they have been awarded a Housing Choice Voucher or another type of assistance.

**Lack of local private fair housing outreach and enforcement.** Private discrimination is the most common in Bellingham, with 74% of respondents (n=47) that experienced housing discrimination saying it was a property owner, property manager, or landlord who discriminated against them. Less than 6% of respondents (n=4) reported being discriminated against by a housing authority or government employee. In addition to source of income discrimination, discrimination based on race or skin color, and disability, were each reported by 53% of our survey of housing professionals and case managers. Most of this discrimination is never reported or investigated. One survey respondent wrote, “There are plenty of laws. They need to be enforced.” This sentiment was echoed by several others.

**Land use zoning laws.** Some aspects of Bellingham’s municipal code may inadvertently exacerbate the shortage of housing options, lack of housing mobility, and socioeconomic segregation. This is because the preponderance of single-family zoning prevents the development of more affordable multi-family units in many residential areas.

**Community opposition.** In the past, there has been significant opposition to proposed changes to zoning laws in some neighborhoods. Community opposition is decreasing but is still strong in predominately single-family ownership neighborhoods. There is some concern that allowing more renters by way of changing occupancy ordinances or building more multi-family units will change the “character” of existing single-family neighborhoods, decrease parking availability, increase noise, etc. However, for the first time, local business groups are calling for more affordable housing as the issue is hindering businesses from recruiting and retaining employees. Although the City continues to make progress on its existing goals, community opposition continues to be a barrier to changing land use and zoning laws.

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related

contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

Most public and professional respondents surveyed support retaining current Fair Housing goals, with some adjustments. The following goals were modified based on prior progress and recent community feedback. Bellingham does not have any R/ECAPS, and levels of segregation remain low. The only relevant Fair Housing issues are disparities in access to opportunity and disproportionate housing needs, although these are not strongly correlated with race/ethnicity, disability, family type, or other protected groups at the Census tract level. Because relatively few Fair Housing issues are applicable, they are provided in a combined column with Contributing Factors and indicated with italics.

These three goals are described more fully in the tables that follow:

Goal #1: Implement adopted City planning policies through appropriate development regulations that support expanded housing choice and increased inventory.

Goal #2: Support people who face housing discrimination by examining where the City may add additional supports and protections.

Goal #3: Provide education on Fair Housing to property managers and owners as well as to renters and tenants to increase public understanding of Fair Housing laws.

Goal #1	Contributing Factors & Fair Housing Issues	Metrics & Milestones	Timeline for Achievement
<p><b>Implement adopted City planning policies through appropriate development regulations that support expanded housing choice and increased inventory</b></p>	<p>Lack of access to opportunity due to high housing costs</p> <p>Location and type of affordable housing</p> <p>Availability of housing units in a range of sizes</p> <p>Land use zoning laws</p> <p>Community opposition</p> <p><i>Disparities in access to opportunity</i></p> <p><i>Disproportionate housing needs</i></p>	<p>Encourage production and preservation of affordable housing through local funding, reflected in existing and any future modified goals of the housing levy and new affordable housing sales tax.</p> <p>Research and evaluate how the City’s adopted planning policies and new policies associated with the Comprehensive Plan update might impact displacement or wealth building by low-income or minority residents, particularly in light of 2021 legislative changes (HB 1220) requiring local jurisdictions to plan and accommodate for housing affordable to all income levels.</p>	<p>Reporting on housing production and preservation – <i>each year in October.</i></p> <p>City Comprehensive Plan with Housing Update and Needs Assessment – <i>by June 30, 2025.</i></p> <p>Analysis of Inclusionary Zoning and Multifamily Tax Exemption (MFTE) policy changes – <i>by June 30, 2025.</i></p> <p>Internal coordination on</p>

		<p>Coordinate closely with long-range planning team members as they implement new guidance to project housing needs at all income levels and analyze racially disparate impacts.</p> <p>Focus on internal City coordination to ensure that Fair Housing and disproportionate impacts are considered in other City-wide plans and goals, using data aggregated for the Assessment of Fair Housing.</p> <p>Support the Whatcom Housing Alliance’s public education and engagement efforts to raise public awareness of the benefits of increased housing choice in all neighborhoods.</p>	<p>plans (such as Capital Improvement Plan, Comprehensive Plan, Bike &amp; Pedestrian master plan) – <i>ongoing</i>.</p> <p><i>Contract renewed annually.</i></p>
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**Discussion:**

The most common concern expressed during the public participation process is the continued lack of affordable housing in Bellingham for those who are low-income as well as middle-income. The limited housing stock has resulted in a very low residential vacancy rate in Bellingham, which means rents continue to rise; our recent market study showed an increase of 30% each year in median rents for all unit sizes. Lack of affordable housing has many consequences. Many renters have very limited housing choice (in housing size, type, and location). Those who are disabled or have special needs, are on fixed incomes, or have housing vouchers are especially limited in their choices.

Furthermore, we see from our analysis of school district and ACS/Census data that neighborhoods with the highest concentrations of children in poverty correspond with neighborhoods with the highest concentrations of non-white children. The elementary schools that serve them are in neighborhoods with the most multi-family zoning.

Comprehensive Plan policies support a variety of housing types and choices. These goals and policies related to land use and zoning are annually reviewed by the department and appointed/elected representatives, including a review of priorities and implementation measures.

Some Bellingham development regulations may inadvertently exacerbate the shortage of housing options, lack of housing mobility, and socioeconomic segregation. Recent ordinances have tried to address this by allowing more multi-family or infill housing in certain areas, but single-family zoning still covers the preponderance of land area, and affordable homeownership opportunities are still lacking which causes higher-income households to remain in the rental market longer than they would like to.

The additional analysis done through this AFH, beyond the HUD-provided data, underscores the importance of expanding affordable housing inventory and choices for all. However, it should be noted that there is still significant community opposition to rezoning single family neighborhoods for more infill development and density.

To help mitigate these factors, Bellingham plans to use local funding to encourage the construction of new housing units and rehabilitate existing units to make them available for low-income renters. These activities, and changing existing development regulations where appropriate, would help increase the available stock of affordable units and reduce economic displacement of residents.

Goal #2	Contributing Factors & Fair Housing Issues	Metrics & Milestones	Timeline for Achievement
<p><b>Support people who face housing discrimination by examining where the City may add additional supports or protections</b></p>	<p>Source of income discrimination</p> <p>Availability of affordable units in a range of sizes</p> <p>Lack of local private fair housing outreach and enforcement</p> <p><i>Disparities in access to opportunity</i></p>	<p>Research the removal of barriers for low-income renters to obtain housing, such as strategies to limit the number of application fees.</p> <p>Maintain funding for landlord liaison position and support for additional housing case managers.</p> <p>Continue participation with Whatcom Landlords &amp; Housing Professionals group, in partnership with other agencies to identify needs and gaps related to renter discrimination (see Goal #3 for more details).</p>	<p>Complete research and keep apprised of State-level protections – <i>within each biennial legislative session (2024, 2026, etc.)</i>.</p> <p>Annual Action Plan – <i>updated each June</i></p> <p>Continued coordination with Landlord Engagement Group – <i>ongoing</i>.</p>

**Discussion:**

Several of the barriers discussed in the previous AFH – such as no-cause lease termination, 20-day notice, and source of income discrimination – have since been resolved through local and state legislative action. Renters in Washington State have more protections than they have in the past, however, the lowest income and most vulnerable renters continue to struggle to find housing. Issues like having a low credit score, history of eviction, or any kind of criminal record can be huge barriers.

Many landlords and property owners are hesitant to rent to applicants with housing assistance because they have preconceived ideas about how they will behave or have had negative experiences in the past. Having an intermediary to help deal with issues as they arise can greatly improve the landlord-tenant relationship. Programs providing housing case management and/or landlord liaison services should be maintained, and if possible, expanded, to help increase the availability of units for very low-income

vulnerable households, and particularly for those transitioning out of institutional settings or homelessness.

We asked professional landlord liaisons, mediators, attorneys, and housing case managers what kinds of additional protections would be most beneficial to their clients. The most popular protection chosen was to limit the number or amount of application fees that can be charged per renter household. Public respondents also reported that multiple application and renewal fees are excessive and make it very difficult for renters on limited incomes to move or obtain housing. City staff would need to study this suggestion, to determine if there are avenues that are legal and feasible for the City to pursue.

Goal #3	Contributing Factors & Fair Housing Issues	Metrics & Milestones	Timeline for Achievement
<p><b>Provide education on Fair Housing to property managers and owners, as well as tenants, to increase public understanding of Fair Housing laws</b></p>	<p>Lack of local private fair housing outreach and enforcement</p> <p>Community opposition</p> <p>Source of income discrimination</p> <p><i>Disparities in access to opportunity</i></p>	<p>Work with local partner agencies to provide coordinated training opportunities and information for landlords, property managers, and renters.</p> <p>In partnership with local housing agencies and mediation organizations, devise a strategy to recognize landlords that voluntarily offer fair and affordable housing, working to remove the stigma of housing assistance.</p> <p>Educate the public, especially property owner and managers, and act as a referral resource for Fair Housing issues as they arise. Create and drop off education materials about Fair Housing when conducting rental inspections.</p>	<p>A single website where local landlords, property managers, and renters can find relevant information is created – <i>before the end of 2023.</i></p> <p>Work with partners to develop a private landlord/property owner recognition program – <i>within 2 years.</i></p> <p>Continued collaboration to provide Fair Housing trainings to the community throughout the year – <i>ongoing, with at least two trainings or events annually.</i></p>

**Discussion:**

The majority of rental units in Bellingham are owned by property owners who own just a few properties, rather than large investors or corporations. It can be difficult for these owners to keep track of the changing legal landscape and know where to go for information among a myriad of different state, local, and non-profit agencies and jurisdictions. It is also difficult for

regional enforcement agencies to investigate complaints on small, individual property owner/managers when there is suspected discrimination.

Working with other local partners who provide housing vouchers and mediation services is an effective way to reach renters and property owners/managers. In May 2022, the City helped to form the Whatcom Landlords & Housing Professionals, a group that has been meeting bi-weekly to develop a single online location where landlords and property managers can access educational information and engage with trainings that are relevant to them.

A survey suggestion was to find a way to promote the benefits of Housing Choice Vouchers and other assistance programs, and counteract the stigma attached with recipients. A promising suggestion is to help engage with small, private landlords and help them see how they are a big part of the solution towards eliminating homelessness in our community. In addition to education, networking and appreciation activities could be one way to help alleviate concerns around these programs.

In addition, the City has a Rental Registration and Safety Inspection Program (RRSIP) that inspects all rental units every two years. This is an opportunity to distribute educational information and resources about Fair Housing to property owners, managers, and tenants.

**Appendix A. HUD Data Tables**

Table 1 - Demographics

	(Bellingham, WA CDBG) Jurisdiction		(Whatcom County) Region			
Race/Ethnicity	#	%	#	%		
White, Non-Hispanic	66,619	82.23%	164,675	81.87%		
Black, Non-Hispanic	985	1.22%	1,789	0.89%		
Hispanic	5,565	6.87%	15,756	7.83%		
Asian or Pacific Islander, Non-Hispanic	3,866	4.77%	7,447	3.70%		
Native American, Non-Hispanic	1,012	1.25%	5,070	2.52%		
Two or More Races, Non-Hispanic	2,797	3.45%	6,038	3.00%		
Other, Non-Hispanic	171	0.21%	365	0.18%		
<b>National Origin</b>	<b>81,015</b>		<b>201,140</b>			
#1 country of origin	Canada	1,390	1.76%	Canada	5,484	2.80%
#2 country of origin	Mexico	1,150	1.45%	Mexico	4,089	2.09%
#3 country of origin	India	795	1.00%	Other Eastern Europe	1,639	0.84%
#4 country of origin	Other Eastern Europe	595	0.75%	India	1,471	0.75%
#5 country of origin	Vietnam	555	0.70%	Philippines	1,039	0.53%
#6 country of origin	China excl. Taiwan	445	0.56%	Vietnam	860	0.44%
#7 country of origin	Philippines	445	0.56%	Other Western Europe	759	0.39%
#8 country of origin	Russia	420	0.53%	Other Central America	748	0.38%
#9 country of origin	Other South Eastern Asia	280	0.35%	Russia	612	0.31%
#10 country of origin	England	210	0.27%	Germany	601	0.31%
<b>Limited English Proficiency (LEP) Language</b>	<b>6,285</b>	<b>7.8%</b>	<b>17,302</b>	<b>8.6%</b>		
#1 LEP Language	Spanish	3,970	5.02%	Spanish	4,764	2.44%
#2 LEP Language	Other Indo-European Language	1,580	2.00%	Other Indo-European Language	1,196	0.61%
#3 LEP Language	Slavic Language	1,390	1.76%	Slavic Language	1,148	0.59%
#4 LEP Language	Vietnamese	755	0.95%	Vietnamese	714	0.37%
#5 LEP Language	Other Asian & Pacific Language	625	0.79%	Other Asian & Pacific Language	540	0.28%
#6 LEP Language	Chinese	605	0.76%	Chinese	384	0.20%
#7 LEP Language	West Germanic Language	405	0.51%	West Germanic Language	252	0.13%
#8 LEP Language	Korean	405	0.51%	Tagalog	196	0.10%
#9 LEP Language	French	290	0.37%	Other & Unspecified Language	123	0.06%
#10 LEP Language	Tagalog	160	0.20%	Korean	82	0.04%
<b>Disability Type</b>	<b>10,185</b>	<b>12.6%</b>	<b>9,399</b>	<b>4.7%</b>		
Hearing difficulty	3,010	3.87%	9,169	4.73%		
Vision difficulty	1,793	2.30%	5,003	2.58%		
Cognitive difficulty	4,295	5.52%	11,149	5.75%		
Ambulatory difficulty	4,540	5.83%	12,518	6.46%		
Self-care difficulty	2,005	2.58%	5,284	2.73%		
Independent living difficulty	3,835	4.93%	9,532	4.92%		
<b>Sex</b>						
Male	39,894	49.24%	99,635	49.54%		
Female	41,122	50.76%	101,505	50.46%		
<b>Age</b>						
Under 18	12,964	16.00%	42,205	20.98%		
18-64	58,353	72.03%	132,295	65.77%		
65+	9,700	11.97%	26,640	13.24%		
<b>Family Type</b>						
Families with children	6,977	42.28%	20,676	42.32%		
Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.						
Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.						
Note 3: Data Sources: Decennial Census; ACS						
<a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation)</a>						

Table 2 - Demographic Trends

Race/Ethnicity	(Bellingham, WA CDBG) Jurisdiction								(Bellingham, WA) Region							
	1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
White, Non-Hispanic	52,241	92.48%	60,555	86.66%	66,619	82.23%	66,619	82.23%	117,140	91.71%	143,834	86.22%	164,675	81.87%	164,675	81.87%
Black, Non-Hispanic	391	0.69%	927	1.33%	1,672	2.06%	985	1.22%	603	0.47%	1,708	1.02%	3,171	1.58%	1,789	0.89%
Hispanic	1,362	2.41%	3,059	4.38%	5,565	6.87%	5,565	6.87%	3,694	2.89%	8,679	5.20%	15,756	7.83%	15,756	7.83%
Asian or Pacific Islander, Non-Hispanic	1,429	2.53%	3,560	5.09%	5,192	6.41%	3,866	4.77%	2,301	1.80%	6,063	3.63%	9,868	4.91%	7,447	3.70%
Native American, Non-Hispanic	977	1.73%	1,445	2.07%	1,773	2.19%	1,012	1.25%	3,818	2.99%	5,752	3.45%	7,232	3.60%	5,070	2.52%
<b>National Origin</b>																
Foreign-born	3,885	6.87%	5,896	8.44%	7,545	9.31%	7,920	9.78%	9,933	7.78%	16,342	9.80%	21,190	10.53%	22,842	11.36%
<b>LEP</b>																
Limited English Proficiency	1,324	2.34%	2,343	3.35%	3,405	4.20%	3,689	4.55%	2,942	2.30%	6,076	3.64%	8,845	4.40%	9,442	4.69%
<b>Sex</b>																
Male	27,356	48.34%	34,000	48.66%	39,894	49.24%	39,894	49.24%	63,161	49.44%	82,285	49.33%	99,635	49.54%	99,635	49.54%
Female	29,234	51.66%	35,877	51.34%	41,122	50.76%	41,122	50.76%	64,584	50.56%	84,529	50.67%	101,505	50.46%	101,505	50.46%
<b>Age</b>	56,590				81,016				127,745				201,140			
Under 18	11,455	20.24%	13,378	19.15%	12,964	16.00%	12,964	16.00%	31,821	24.91%	41,418	24.83%	42,205	20.98%	42,205	20.98%
18-64	37,321	65.95%	48,034	68.74%	58,353	72.03%	58,353	72.03%	79,699	62.39%	105,978	63.53%	132,295	65.77%	132,295	65.77%
65+	7,814	13.81%	8,465	12.11%	9,700	11.97%	9,700	11.97%	16,225	12.70%	19,418	11.64%	26,640	13.24%	26,640	13.24%
<b>Family Type</b>																
Families with children	6,153	47.07%	4,879	45.72%	6,977	42.28%	6,977	42.28%	15,740	48.39%	15,561	48.04%	20,676	42.32%	20,676	42.32%

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info/resource/4848/affh-data-documentation](http://www.hudexchange.info/resource/4848/affh-data-documentation)).

**Table 3 - Racial/Ethnic Dissimilarity Trends**

	(Bellingham, WA CDBG) Jurisdiction				(Bellingham, WA) Region			
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	19.69	16.02	15.96	22.34	23.90	18.56	17.05	24.07
Black/White	26.33	16.05	16.02	23.85	30.62	20.77	18.46	27.09
Hispanic/White	19.96	21.06	23.20	26.72	20.49	21.54	22.60	26.67
Asian or Pacific Islander/White	18.31	16.42	16.74	25.63	20.28	23.15	21.83	27.91
Note 1: Data Sources: Decennial Census								
Note 2: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a> ).								

**Table 4 - R/ECAP Demographics**

	<b>(Bellingham, WA CDBG) Jurisdiction</b>		<b>(Bellingham, WA) Region</b>			
<b>R/ECAP Race/Ethnicity</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		
Total Population in R/ECAPs	0	-	0	-		
White, Non-Hispanic	0	N/a	0	N/a		
Black, Non-Hispanic	0	N/a	0	N/a		
Hispanic	0	N/a	0	N/a		
Asian or Pacific Islander, Non-Hispanic	0	N/a	0	N/a		
Native American, Non-Hispanic	0	N/a	0	N/a		
Other, Non-Hispanic	0	N/a	0	N/a		
<b>R/ECAP Family Type</b>						
Total Families in R/ECAPs	0	-	0	-		
Families with children	0	N/a	0	N/a		
<b>R/ECAP National Origin</b>						
Total Population in R/ECAPs		N/a	-	N/a	-	
#1 country of origin	NULL	0	0.00%	NULL	0	0.00%
#2 country of origin	NULL	0	0.00%	NULL	0	0.00%
#3 country of origin	NULL	0	0.00%	NULL	0	0.00%
#4 country of origin	NULL	0	0.00%	NULL	0	0.00%
#5 country of origin	NULL	0	0.00%	NULL	0	0.00%
#6 country of origin	NULL	0	0.00%	NULL	0	0.00%
#7 country of origin	NULL	0	0.00%	NULL	0	0.00%
#8 country of origin	NULL	0	0.00%	NULL	0	0.00%
#9 country of origin	NULL	0	0.00%	NULL	0	0.00%
#10 country of origin	NULL	0	0.00%	NULL	0	0.00%
<p>Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.</p> <p>Note 2: Data Sources: Decennial Census; ACS</p> <p>Note 3: Refer to the Data Documentation for details (<a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a>).</p>						

**Table 5 - Publicly Supported Housing Units by Program Category**

	<b>(Bellingham, WA CDBG) Jurisdiction</b>	
<b>Housing Units</b>	<b>#</b>	<b>%</b>
Total housing units	36,577	-
Public Housing	504	1.38%
Project-based Section 8	144	0.39%
Other Multifamily	20	0.05%
HCV Program	1,176	3.22%
<p>Note 1: Data Sources: Decennial Census; APSH</p> <p>Note 2: Refer to the Data Documentation for details (<a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a>).</p>		

**Table 6 - Publicly Supported Households by Race/Ethnicity**

	Race/Ethnicity							
(Bellingham, WA CDBG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	405	80.84%	15	2.99%	41	8.18%	28	5.59%
Project-Based Section 8	107	81.06%	5	3.79%	9	6.82%	9	6.82%
Other Multifamily	14	70.00%	0	0.00%	2	10.00%	4	20.00%
HCV Program	858	81.28%	57	5.44%	79	7.50%	30	2.81%
Total Households	28,820	84.52%	295	0.87%	2,000	5.87%	1,425	4.18%
0-30% of AMI	4,740	76.27%	150	2.41%	605	9.73%	355	5.71%
0-50% of AMI	8,740	78.39%	205	1.84%	870	7.80%	520	4.66%
0-80% of AMI	14,105	81.06%	230	1.32%	1,230	7.07%	740	4.25%
(Bellingham, WA) Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	546	81.37%	19	2.83%	56	8.35%	35	5.22%
Project-Based Section 8	242	82.59%	7	2.39%	23	7.85%	16	5.46%
Other Multifamily	14	70.00%	0	0.00%	2	10.00%	4	20.00%
HCV Program	1,316	80.93%	80	4.92%	142	8.73%	40	2.46%
Total Households	69,880	86.25%	554	0.68%	4,554	5.62%	2,683	3.31%
0-30% of AMI	9,260	80.07%	205	1.77%	884	7.64%	510	4.41%
0-50% of AMI	17,265	79.71%	280	1.29%	1,814	8.37%	825	3.81%
0-80% of AMI	29,225	81.87%	390	1.09%	2,839	7.95%	1,193	3.34%
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: Numbers presented are numbers of households not individuals.								
Note 3: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a> ).								

**Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category**

(Bellingham, WA CDBG) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
<b>Public Housing</b>								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	500	80.84%	2.99%	8.18%	5.59%	13.57%	43.91%	64.14%
<b>Project-based Section 8</b>								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	135	81.06%	3.79%	6.82%	6.82%	23.36%	38.69%	47.70%
<b>Other Multifamily</b>								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	20	70.00%	0.00%	10.00%	20.00%	N/a	100.00%	26.09%
<b>HCV Program</b>								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	1,045	81.26%	5.45%	7.51%	2.81%	27.28%	33.40%	39.56%
<p>Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.</p> <p>Note 2: Data Sources: APSH</p> <p>Note 3: Refer to the Data Documentation for details (<a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a>).</p>								

**Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category**

<b>Public Housing</b>								
<b>(Bellingham, WA CDBG) Jurisdiction</b>								
<b>Development Name</b>	<b>PHA Code</b>	<b>PHA Name</b>	<b># Units</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Households with Children</b>
LINCOLN SQUARE	WA025	Housing Authority	396	83.97	2.54	5.6	5.85	N/a
TEXAS MEADOWS	WA025	Housing Authority	108	69.44	4.63	17.59	4.63	62.96

<b>Project-Based Section 8</b>								
<b>(Bellingham, WA CDBG) Jurisdiction</b>								
<b>Development Name</b>	<b>PHA Code</b>	<b>PHA Name</b>	<b># Units</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Households with Children</b>
BIRCHWOOD MANOR	N/a	N/a	38	86.11	2.78	2.78	8.33	N/a
CATHERINE MAY APTS	N/a	N/a	38	86.49	N/a	10.81	2.7	N/a
VARSITY VILLAGE	N/a	N/a	63	74.58	6.78	6.78	8.47	54.24
VARSITY VILLAGE	N/a	N/a	5	N/a	N/a	N/a	N/a	N/a

<b>Other Multifamily Assisted Housing</b>								
<b>(Bellingham, WA CDBG) Jurisdiction</b>								
<b>Development Name</b>	<b>PHA Code</b>	<b>PHA Name</b>	<b># Units</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Households with Children</b>
STERLING SENIOR	N/a	N/a	20	70	N/a	10	20	N/a

Note 1: For LIHTC properties, this information will be supplied by local knowledge.

Note 2: Percentages may not add to 100 due to rounding error.

Note 3: Data Sources: APSH

Note 4: Refer to the Data Documentation for details ([www.hudexchange.info/resource/4848/affh-data-documentation](http://www.hudexchange.info/resource/4848/affh-data-documentation)).

**Table 9 - Demographics of Households with Disproportionate Housing Needs**

Disproportionate Housing Needs	(Bellingham, WA CDBG) Jurisdiction			(Bellingham, WA) Region		
	Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households
<b>Race/Ethnicity</b>						
White, Non-Hispanic	11,700	28,820	40.60%	24,945	69,880	35.70%
Black, Non-Hispanic	125	295	42.37%	314	554	56.68%
Hispanic	1,130	2,000	56.50%	2,465	4,554	54.13%
Asian or Pacific Islander, Non-Hispanic	545	1,425	38.25%	1,058	2,683	39.43%
Native American, Non-Hispanic	380	609	62.40%	825	1,693	48.73%
Other, Non-Hispanic	705	955	73.82%	1,040	1,640	63.41%
<b>Total</b>	<b>14,595</b>	<b>34,100</b>	<b>42.80%</b>	<b>30,650</b>	<b>81,020</b>	<b>37.83%</b>
<b>Household Type and Size</b>						
Family households, <5 people	4,490	14,815	30.31%	12,230	43,165	28.33%
Family households, 5+ people	645	1,420	45.42%	2,785	6,034	46.16%
Non-family households	9,460	17,860	52.97%	15,640	31,825	49.14%
<b>Households experiencing any of 4 Severe Housing Problems</b>						
	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
<b>Race/Ethnicity</b>						
White, Non-Hispanic	6,740	28,820	23.39%	13,130	69,880	18.79%
Black, Non-Hispanic	120	295	40.68%	180	554	32.49%
Hispanic	725	2,000	36.25%	1,565	4,554	34.37%
Asian or Pacific Islander, Non-Hispanic	410	1,425	28.77%	579	2,683	21.58%
Native American, Non-Hispanic	160	609	26.27%	400	1,693	23.63%
Other, Non-Hispanic	330	955	34.55%	515	1,640	31.40%
<b>Total</b>	<b>8,490</b>	<b>34,100</b>	<b>24.90%</b>	<b>16,380</b>	<b>81,020</b>	<b>20.22%</b>
<p>Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.</p> <p>Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.</p> <p>Note 3: Data Sources: CHAS</p> <p>Note 4: Refer to the Data Documentation for details (<a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a>).</p>						

**Table 10 - Demographics of Households with Severe Housing Cost Burden**

Households with Severe Housing Cost Burden	(Bellingham, WA CDBG) Jurisdiction			(Bellingham, WA) Region		
	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
<b>Race/Ethnicity</b>						
White, Non-Hispanic	6,070	28,820	21.06%	11,660	69,880	16.69%
Black, Non-Hispanic	120	295	40.68%	165	554	29.78%
Hispanic	555	2,000	27.75%	1,025	4,554	22.51%
Asian or Pacific Islander, Non-Hispanic	340	1,425	23.86%	495	2,683	18.45%
Native American, Non-Hispanic	150	609	24.63%	285	1,693	16.83%
Other, Non-Hispanic	310	955	32.46%	405	1,640	24.70%
<b>Total</b>	<b>7,545</b>	<b>34,100</b>	<b>22.13%</b>	<b>14,035</b>	<b>81,020</b>	<b>17.32%</b>
<b>Household Type and Size</b>						
Family households, <5 people	1,990	14,815	13.43%	4,730	43,165	10.96%
Family households, 5+ people	145	1,420	10.21%	525	6,034	8.70%
Non-family households	5,410	17,860	30.29%	8,790	31,825	27.62%
<p>Note 1: Severe housing cost burden is defined as greater than 50% of income.</p> <p>Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.</p> <p>Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.</p> <p>Note 4: Data Sources: CHAS</p> <p>Note 5: Refer to the Data Documentation for details (<a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a>).</p>						

**Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children**

<b>(Bellingham, WA CDBG) Jurisdiction</b>										
	<b>Households in 0-1 Bedroom Units</b>		<b>Households in 2 Bedroom Units</b>		<b>Households in 3+ Bedroom Units</b>		<b>Households with Children</b>			
<b>Housing Type</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Public Housing	383	76.45%	83	16.57%	35	6.99%	68	13.57%		
Project-Based Section 8	92	67.15%	34	24.82%	6	4.38%	32	23.36%		
Other Multifamily	20	100.00%	0	0.00%	0	0.00%	N/a	N/a		
HCV Program	567	53.70%	321	30.36%	168	15.94%	288	27.26%		
Note 1: Data Sources: APSH Note 2: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a> ).										

**Table 12 - Opportunity Indicators, by Race/Ethnicity**

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
<b>(Bellingham, WA CDBG) Jurisdiction</b>							
<b>Total Population</b>							
White, Non-Hispanic	51.23	57.62	61.52	66.02	53.95	73.79	32.76
Black, Non-Hispanic	43.83	55.18	54.44	69.76	57.23	75.06	31.45
Hispanic	41.35	48.65	54.55	69.26	56.00	78.35	34.89
Asian or Pacific Islander, Non-Hispanic	46.14	52.90	56.38	66.74	53.88	76.83	34.63
Native American, Non-Hispanic	41.38	49.97	54.08	70.65	58.32	78.19	32.98
<b>Population below federal poverty line</b>							
White, Non-Hispanic	46.46	60.67	56.86	71.13	57.37	71.27	28.98
Black, Non-Hispanic	35.90	50.34	53.59	77.36	58.99	70.02	37.20
Hispanic	51.88	56.94	62.26	70.05	55.06	73.34	29.20
Asian or Pacific Islander, Non-Hispanic	43.16	57.98	55.61	72.61	58.20	73.82	29.87
Native American, Non-Hispanic	38.25	55.13	45.61	71.68	59.52	81.24	29.65
<b>(Bellingham, WA) Region</b>							
<b>Total Population</b>							
White, Non-Hispanic	55.93	50.47	55.85	54.80	40.25	49.21	44.42
Black, Non-Hispanic	49.62	50.41	53.40	60.36	46.05	57.70	39.33
Hispanic	52.62	47.03	50.86	54.93	39.78	50.54	46.03
Asian or Pacific Islander, Non-Hispanic	52.85	50.05	55.49	58.06	44.27	60.16	40.53
Native American, Non-Hispanic	35.56	29.60	34.56	59.89	35.55	43.89	44.41
<b>Population below federal poverty line</b>							
White, Non-Hispanic	49.85	52.63	51.74	60.92	46.14	54.72	39.98
Black, Non-Hispanic	37.50	48.06	51.12	72.81	55.08	64.31	38.50
Hispanic	51.91	50.74	50.04	60.40	41.00	45.63	41.86
Asian or Pacific Islander, Non-Hispanic	44.98	53.47	52.58	66.23	51.06	63.51	37.95
Native American, Non-Hispanic	34.77	40.12	35.49	63.59	44.45	58.18	42.83
<p>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA</p> <p>Note 2: Refer to the Data Documentation for details (<a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a>).</p>							

**Table 13 - Disability by Type**

Disability Type	(Bellingham, WA CDBG) Jurisdiction		(Bellingham, WA) Region	
	#	%	#	%
Hearing difficulty	3,010	3.87%	9,169	4.73%
Vision difficulty	1,793	2.30%	5,003	2.58%
Cognitive difficulty	4,295	5.52%	11,149	5.75%
Ambulatory difficulty	4,540	5.83%	12,518	6.46%
Self-care difficulty	2,005	2.58%	5,284	2.73%
Independent living difficulty	3,835	4.93%	9,532	4.92%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info/resource/4848/affh-data-documentation](http://www.hudexchange.info/resource/4848/affh-data-documentation)).

**Table 14 - Disability by Age Group**

	<b>(Bellingham, WA CDBG) Jurisdiction</b>		<b>(Bellingham, WA) Region</b>	
<b>Age of People with Disabilities</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
age 5-17 with Disabilities	485	0.62%	1,692	0.87%
age 18-64 with Disabilities	5,760	7.40%	14,616	7.54%
age 65+ with Disabilities	3,770	4.84%	10,504	5.42%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info/resource/4848/affh-data-documentation](http://www.hudexchange.info/resource/4848/affh-data-documentation)).

**Table 15 - Disability by Publicly Supported Housing Program Category**

<b>(Bellingham, WA CDBG) Jurisdiction</b>	<b>People with a Disability</b>	
	<b>#</b>	<b>%</b>
Public Housing	321	64.14%
Project-Based Section 8	65	47.70%
Other Multifamily	5	26.09%
HCV Program	418	39.60%
<b>(Whatcom County) Region</b>		
Public Housing	388	57.23%
Project-Based Section 8	87	29.35%
Other Multifamily	5	26.09%
HCV Program	598	36.77%
<p>Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.</p> <p>Note 2: Data Sources: ACS</p> <p><a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).</a></p>		

**Table 16 - Homeownership and Rental Rates by Race/Ethnicity**

	<b>(Bellingham, WA CDBG) Jurisdiction</b>				<b>(Bellingham, WA) Region</b>			
	<b>Homeowners</b>		<b>Renters</b>		<b>Homeowners</b>		<b>Renters</b>	
<b>Race/Ethnicity</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
White, Non-Hispanic	13,850	90.32%	14,965	79.75%	45,350	89.95%	24,530	80.15%
Black, Non-Hispanic	35	0.23%	255	1.36%	210	0.42%	335	1.09%
Hispanic	525	3.42%	1,475	7.86%	1,800	3.57%	2,745	8.97%
Asian or Pacific Islander, Non-Hispanic	650	4.24%	775	4.13%	1,625	3.22%	1,075	3.51%
Native American, Non-Hispanic	120	0.78%	490	2.61%	845	1.68%	855	2.79%
Other, Non-Hispanic	155	1.01%	810	4.32%	580	1.15%	1,060	3.46%
Total Household Units	15,335	-	18,765	-	50,415	-	30,605	-

Note 1: Data presented are numbers of households, not individuals.

Note 2: Data Sources: CHAS

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info/resource/4848/affh-data-documentation](http://www.hudexchange.info/resource/4848/affh-data-documentation)).

**Table 17 - Demographics of PHA Assisted Households**

**Please note that this table is not provided for this type of program participant.**

**Table 18 - PHA Assisted Residents by Race/Ethnicity**

**Please note that this table is not provided for this type of program participant.**

**Information**

<b>Version Name:</b>	AFFHT0006
<b>Version Description:</b>	Released July 10, 2020.
<b>For more information refer to:</b>	<a href="https://www.hudexchange.info/programs/affh/resources/#affh-data-and-mapping">https://www.hudexchange.info/programs/affh/resources/#affh-data-and-mapping</a>

*Created Date (UTC): 06/14/2022*

*Created Time (UTC): 20:22:14*

**Appendix B. Housing Equity Survey Summary**

# Community Housing Equity and Access Survey

Summary of Results

395

Total Complete Responses from Bellingham Residents

Date Opened: April 12, 2022

Date Closed: June 30, 2022



# High-Level Summary: Who we heard from

See the  
“Demographics”  
section for  
complete  
demographic data.



**395 Bellingham residents** (or 0.4% of Bellingham’s total population – a pretty good sample size).\*



**People at all income levels** (proportionate with Bellingham’s total population).



**More homeowners than renters** (homeowners were overrepresented in our sample).



**Mostly white, non-Hispanic folks** (proportionate with Bellingham’s total population).



**Families with children** (families with kids were overrepresented in our sample).



**Folks with disabilities** (proportionate with Bellingham’s total population).

\*A targeted survey was sent through the Bellingham School District, and we were able to collect feedback from 92 households who identify as Hispanic or Latinx. Those results are not incorporated here.

# High-Level Summary: *Who we didn't* hear from

See the  
"Demographics"  
section for  
complete  
demographic data.



**Renters** (37% of our survey respondents compared to 55% of Bellingham's general population).



**Asian American and Pacific Islanders** (only 0.8% of respondents, compared to 5.6% of Bellingham's population) and **Black/African American folks** (only .3% of survey respondents compared to 1.6% of Bellingham's population).



**Hispanic and Latinx folks\*** (about 5% of our survey respondents compared to 9.6% of Bellingham's general population).



**Young people** (we didn't specifically ask a question about age but based on the percent of respondents who are homeowners and have children, it's reasonable to assume our large population of young people ages 20-24 were underrepresented).



**People who live outside of Bellingham** (the survey was limited to those people who reside here and didn't count people who work in Bellingham but live outside the city).

# High-Level Summary: Priorities

- Of the strategies the City is already using, the top priority for the community among the options given was **construction of permanently affordable apartments**. This priority was consistent among income levels.
- Of the strategies that the city is not already using, the top priorities were to **require all new developments to provide some affordable housing for low-income residents** (inclusionary zoning) and to **support limited-equity housing cooperatives** (non-profit condominiums).
- The factors that were identified as most contributing to inequality here in Bellingham were **lack of access to opportunity due to high housing costs** and the **location and type of affordable housing**. Issues like discrimination, environmental hazards, and schools ranked very low.

# High-Level Summary

The comments below are representative of the most common feedback we received in response to open-ended questions.

Increase taxes on landlords, developers, and/or investors

Lower taxes in general

Institute a cap on rents/rent control

More homes, condos, etc. for ownership rather than more rental housing

Density, density, density! No more single-family zoning

Stop providing services for people who aren't "from" here

More publicly and/or cooperatively owned housing and mobile home parks

Eliminate parking requirements.  
Do NOT eliminate parking requirements.

# Discrimination

## Community survey respondents

- 57 of 395 respondents said they had faced some type of housing discrimination.
- 38% of these respondents said the discrimination was for something not protected by Fair Housing law.
- The most commonly-reported discrimination based on a legally protected class was **source of income discrimination**.

## Targeted survey respondents (landlord-tenant mediators)

- We sent a targeted survey to professionals who work with both low-income tenants and landlords/property managers.
- 85% said they'd had a client who faced source of income discrimination, 50% said race or ethnicity discrimination, and 50% said discrimination based on disability status or reasonable accommodation.

# Complete survey response data

Below are some ways the City is currently trying to increase access to housing and improve housing equity. Please rank these from highest to lowest priority. The City should prioritize:

Answered: 366 Skipped: 29



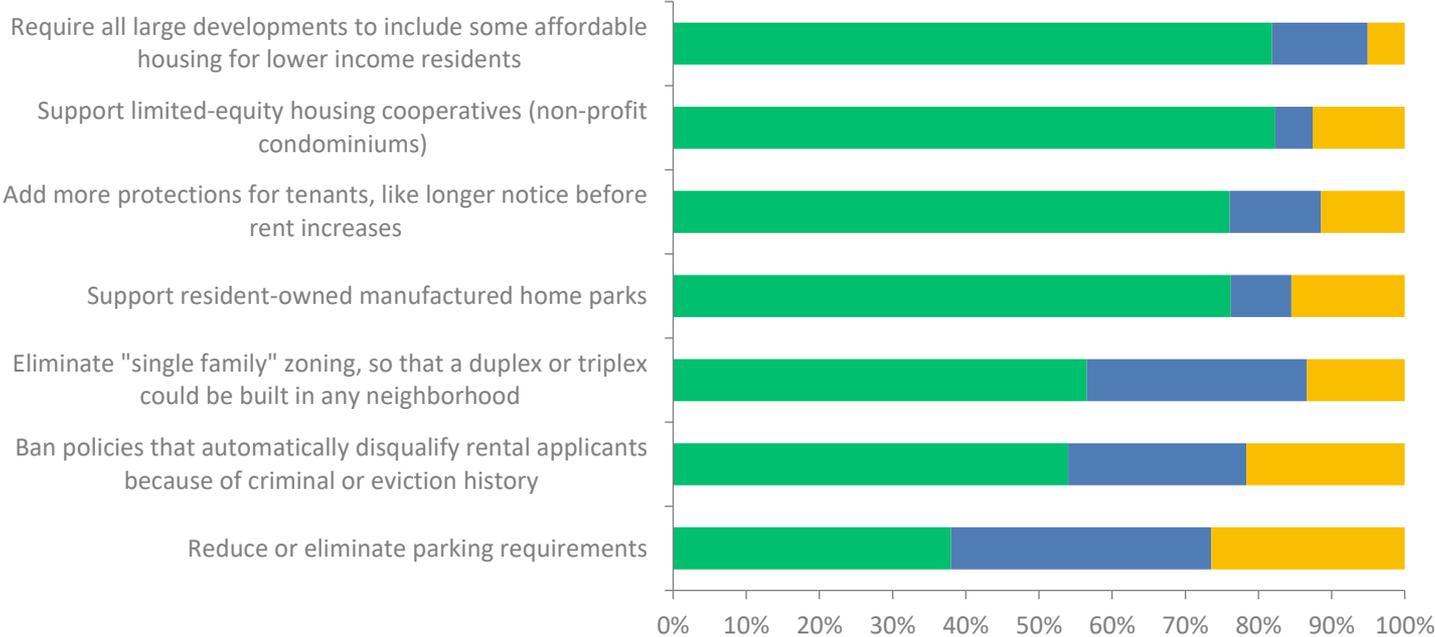
Below are some ways the City is currently trying to increase access to housing and improve housing equity. Please rank these from highest to lowest priority.

Answered: 366 Skipped: 29

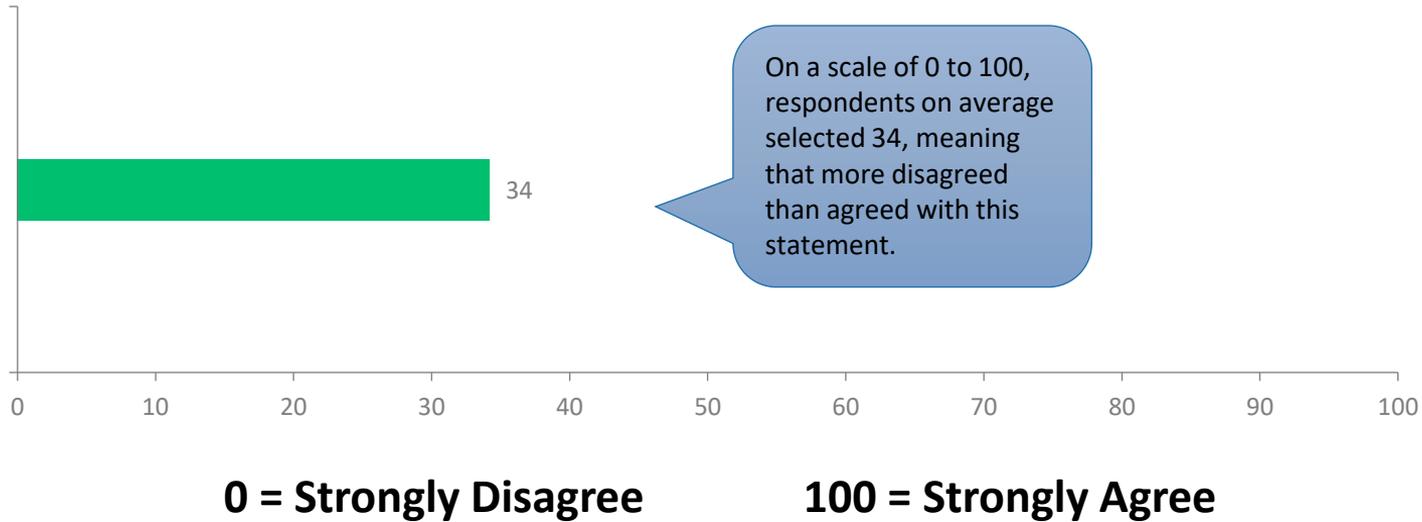
	1	2	3	4	5	6	WEIGHTED AVERAGE
Construction of permanently affordable apartments	45.85% 160	17.48% 61	15.47% 54	8.88% 31	7.74% 27	4.58% 16	4.71
Assistance to help low-income households purchase a home	23.70% 82	23.99% 83	18.79% 65	14.16% 49	10.12% 35	9.25% 32	4.09
Home repairs for low-income, disabled, and elderly homeowners	11.05% 39	22.10% 78	23.51% 83	18.98% 67	19.55% 69	4.82% 17	3.72
Higher density within some residential areas (near transit, for example)	12.00% 42	18.00% 63	17.14% 60	17.14% 60	20.29% 71	15.43% 54	3.38
Backyard cottages (ADUs) in more neighborhoods	7.74% 27	12.89% 45	16.05% 56	20.92% 73	24.36% 85	18.05% 63	3.05
Tax incentives to private builders of apartment buildings (in some areas)	3.48% 12	6.38% 22	9.57% 33	18.55% 64	15.36% 53	46.67% 161	2.24

Below are some other options which the City could use to improve equitable access to housing, but is not currently. Please indicate which ideas you support.

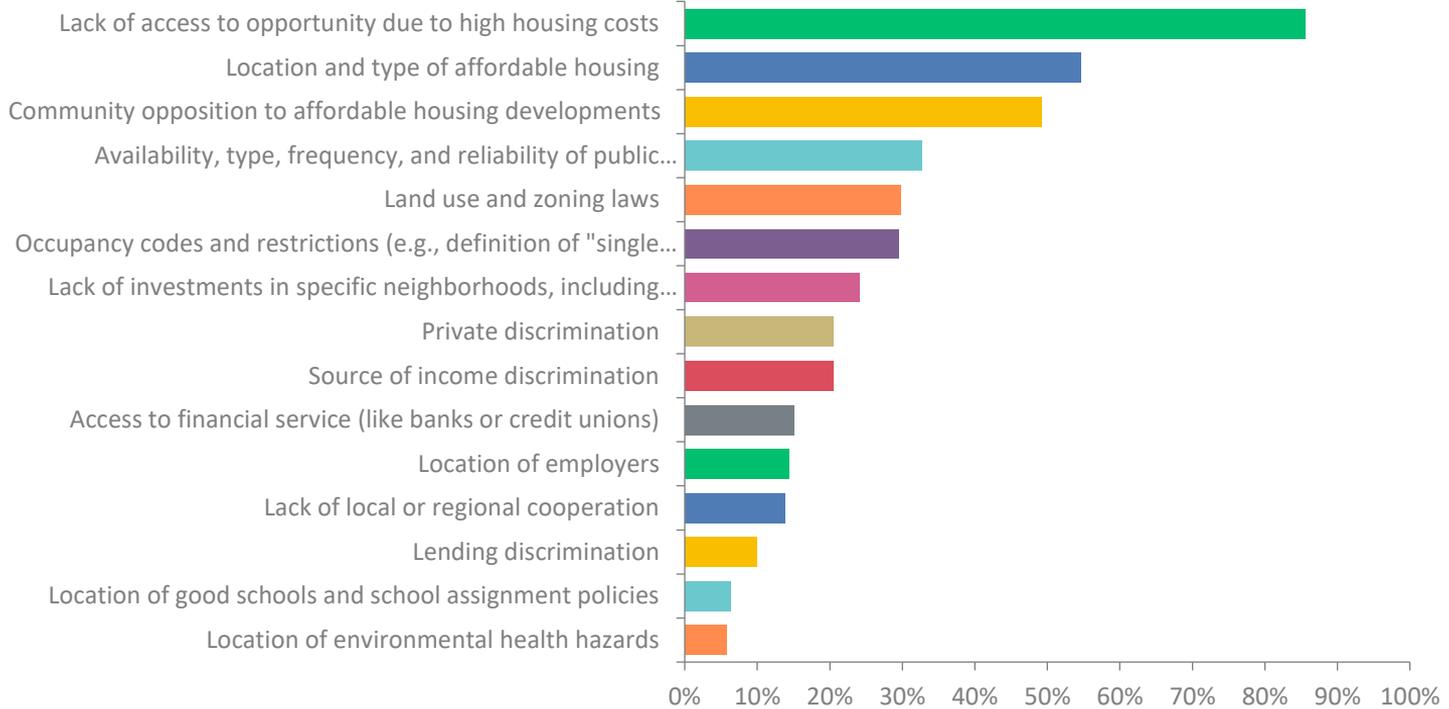
Answered: 377 Skipped: 18



How much do you agree with the following statement?  
*"Everyone in Bellingham has equal access to opportunities, regardless of their personal characteristics (race, gender, national origin, etc.) or what neighborhood they live in."*



Below are factors that might lead to unequal access to opportunity. Please choose the top 4 factors that you think increase disparities here in Bellingham.



# Please choose the top 4 factors that you think increase disparities here in Bellingham

Answered: 333 Skipped: 62

ANSWER CHOICES	RESPONSES	
Lack of access to opportunity due to high housing costs	85.59%	285
Location and type of affordable housing	54.65%	182
Community opposition to affordable housing developments	49.25%	164
Availability, type, frequency, and reliability of public transportation	32.73%	109
Land use and zoning laws	29.73%	99
Occupancy codes and restrictions (e.g., definition of "single family")	29.43%	98
Lack of investments in specific neighborhoods, including services or amenities	24.02%	80
Private discrimination	20.42%	68
Source of income discrimination	20.42%	68
Access to financial service (like banks or credit unions)	15.02%	50
Location of employers	14.41%	48
Lack of local or regional cooperation	13.81%	46
Lending discrimination	9.91%	33
Location of good schools and school assignment policies	6.31%	21
Location of environmental health hazards	5.71%	19

# Discrimination protected under Fair Housing Law

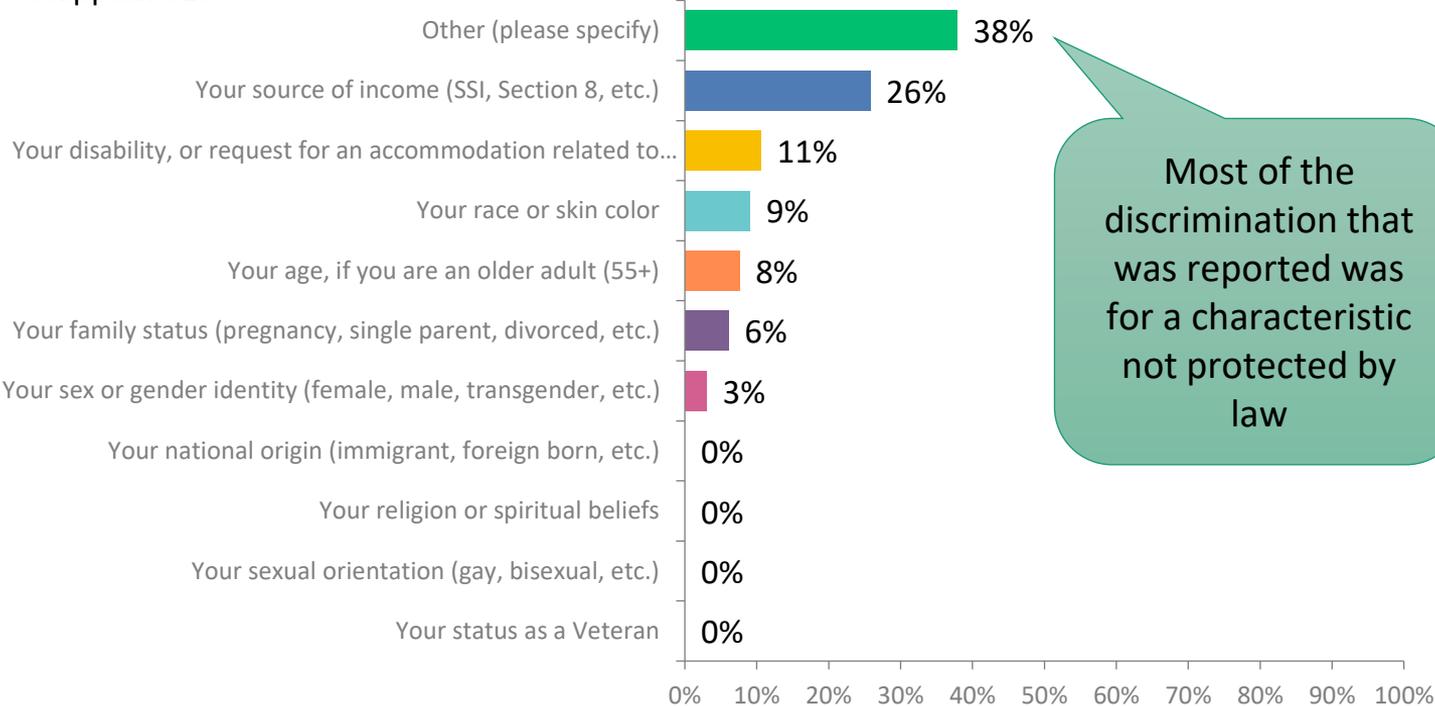
# Do you believe you've experienced housing discrimination in Bellingham?

• Answered: 358 Skipped: 37

ANSWER CHOICES	RESPONSES	
Yes	15.92%	57
No	74.86%	268
I'm not sure	9.22%	33
TOTAL		358

# What personal characteristic do you think was behind this discrimination?

Answered: 66 Skipped: 329



# Who discriminated against you?

• Answered: 65 Skipped: 330

ANSWER CHOICES	RESPONSES	
property manager or property management company	38.46%	25
landlord or property owner	33.85%	22
real estate agent or appraiser	1.54%	1
mortgage lender, bank, or insurance agent	4.62%	3
housing authority or non-profit staff person	4.62%	3
government employee or representative (federal, state, or local)	1.54%	1
neighbor	0%	0
Other (please specify)	15.38%	10
TOTAL		65

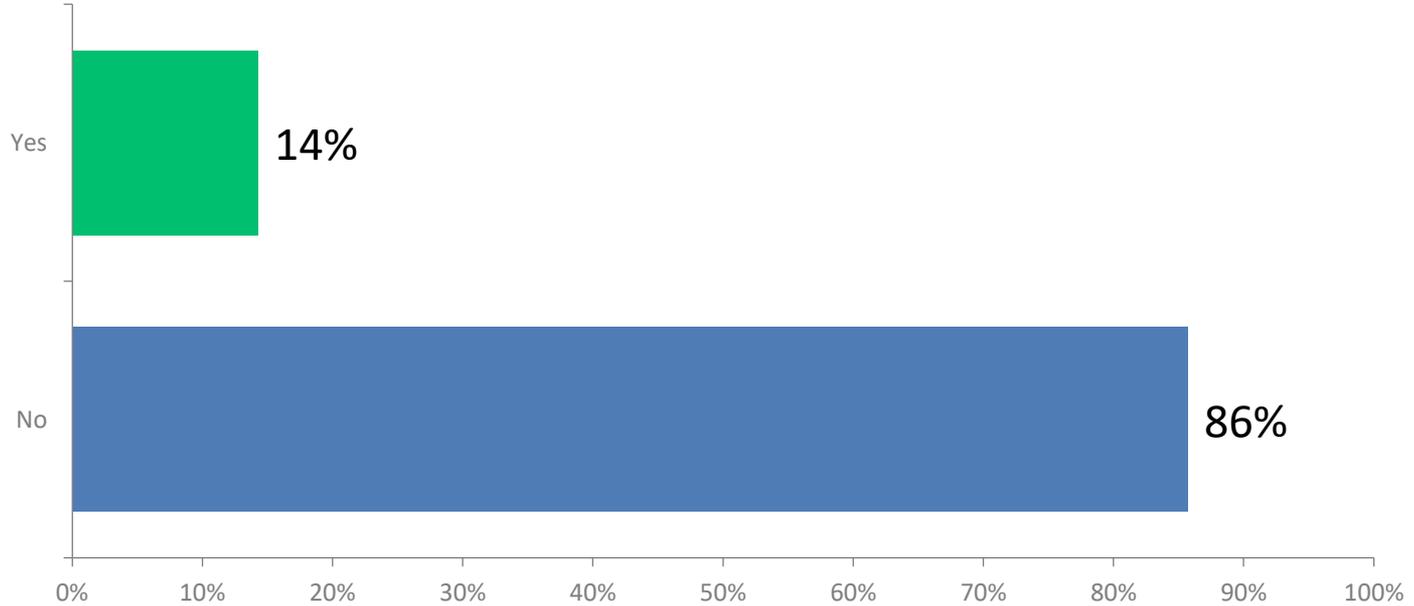
# Where did the act of discrimination occur?

- Answered: 60 Skipped: 335

ANSWER CHOICES	RESPONSES	
apartment complex	51.67%	31
public, housing authority, or nonprofit housing	10.0%	6
condo development	3.33%	2
mobile or manufactured home park	3.33%	2
single-family neighborhood	35.00%	21
when applying for government programs	5.00%	3
Other (please specify)	15.00%	9
TOTAL		74

# Was the discrimination reported?

• Answered: 63 Skipped: 332



# Was the discrimination reported?

- Answered: 63 Skipped: 332

ANSWER CHOICES	RESPONSES	
Yes	14.29%	9
No	85.71%	54
TOTAL		63

# If no, why did you not report the discrimination?

• Answered: 58 Skipped: 337

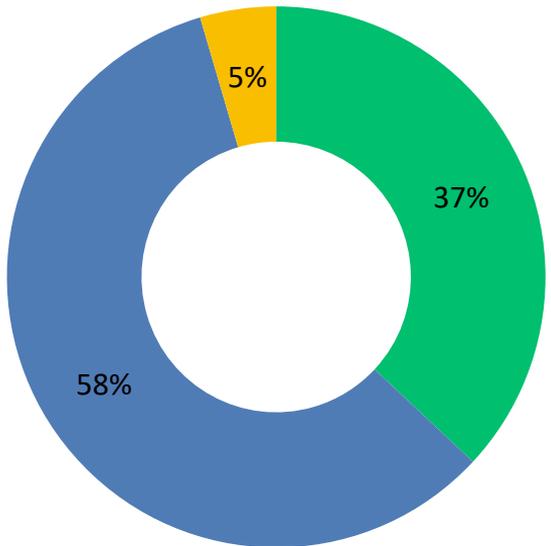
ANSWER CHOICES	RESPONSES	
Don't know where to report	20.69%	12
Afraid of retaliation	6.90%	4
Don't believe it makes any difference	48.28%	28
Too much trouble	1.72%	1
Other (please specify)	22.41%	13
TOTAL		58

# Demographics

- Profile of survey respondents

# Do you own or rent your home?

Answered: 395 Skipped: 0



■ Rent ■ Own ■ Other (please specify)

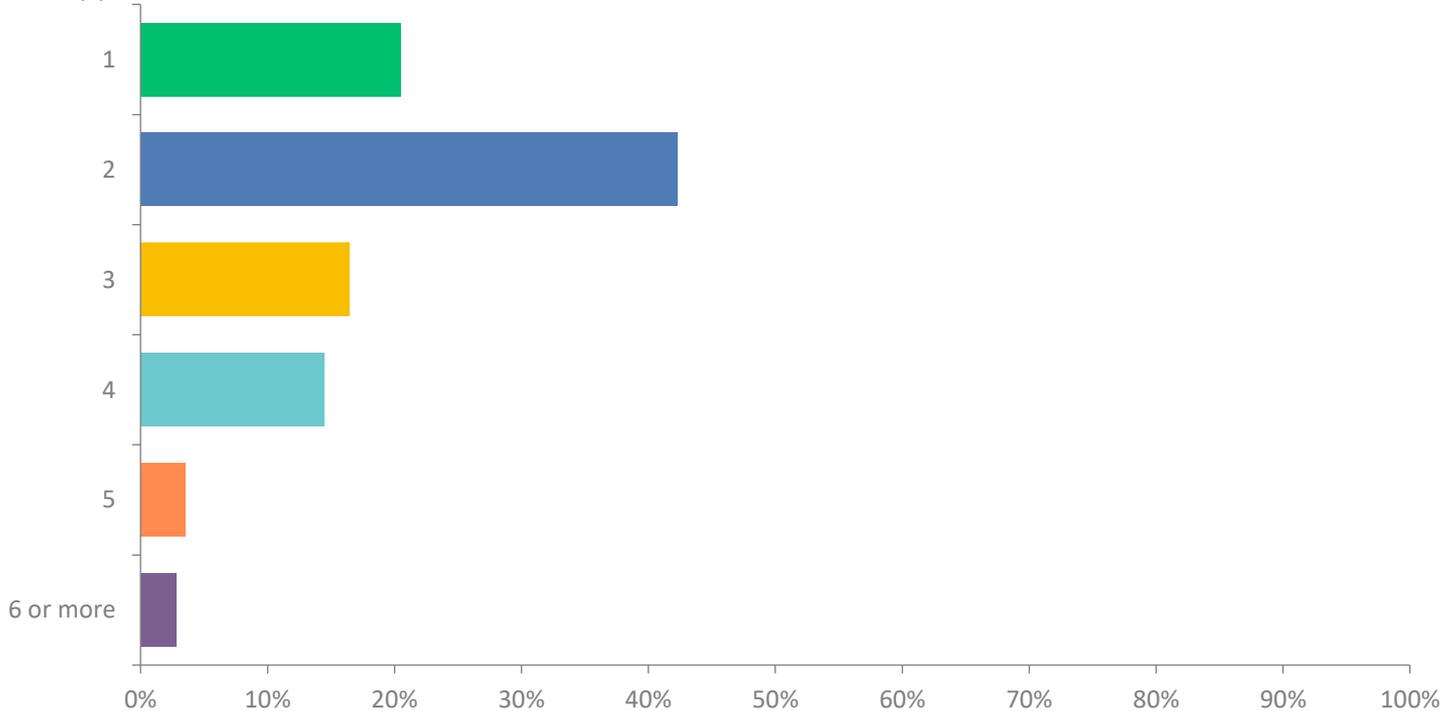
# Do you own or rent your home?

Answered: 395 Skipped: 0

ANSWER CHOICES	RESPONSES	
Rent	36.96%	146
Own	58.48%	231
Other (please specify)	4.56%	18
TOTAL		395

# How many people live in your household, including yourself?

Answered: 395 Skipped: 0



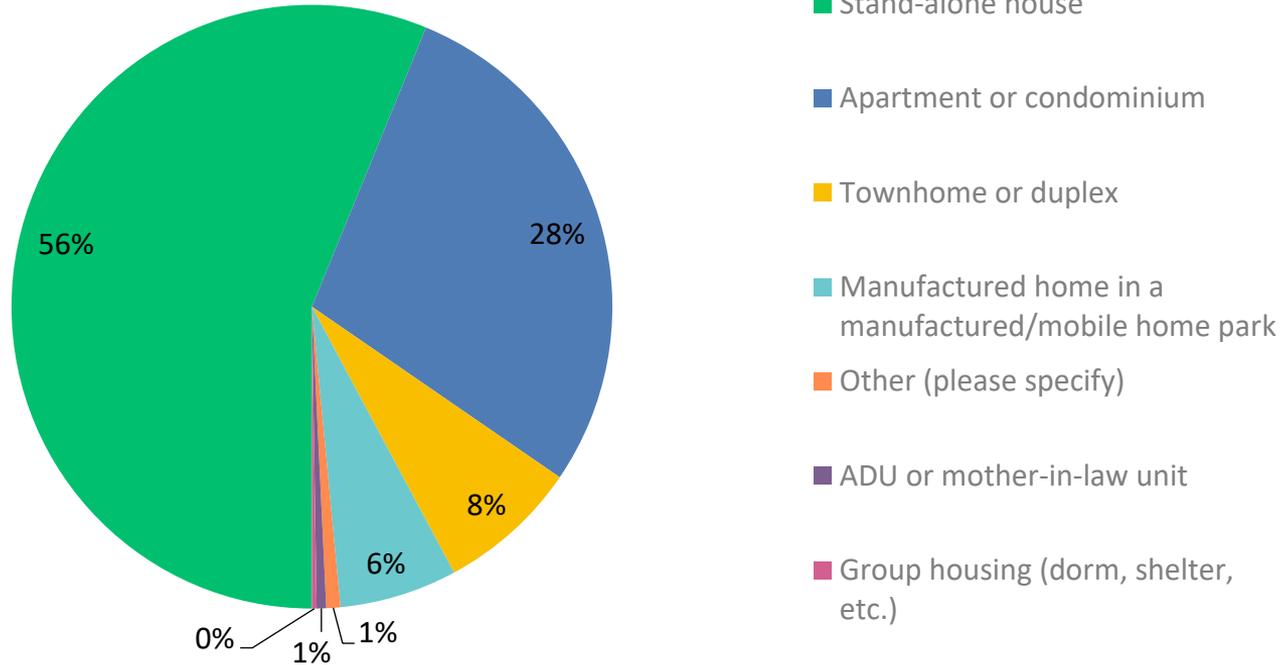
# How many people live in your household, including yourself?

Answered: 395 Skipped: 0

ANSWER CHOICES	RESPONSES	
1	20.51%	81
2	42.28%	167
3	16.46%	65
4	14.43%	57
5	3.54%	14
6 or more	2.78%	11
TOTAL		395

# What type of housing do you live in?

Answered: 395 Skipped: 0



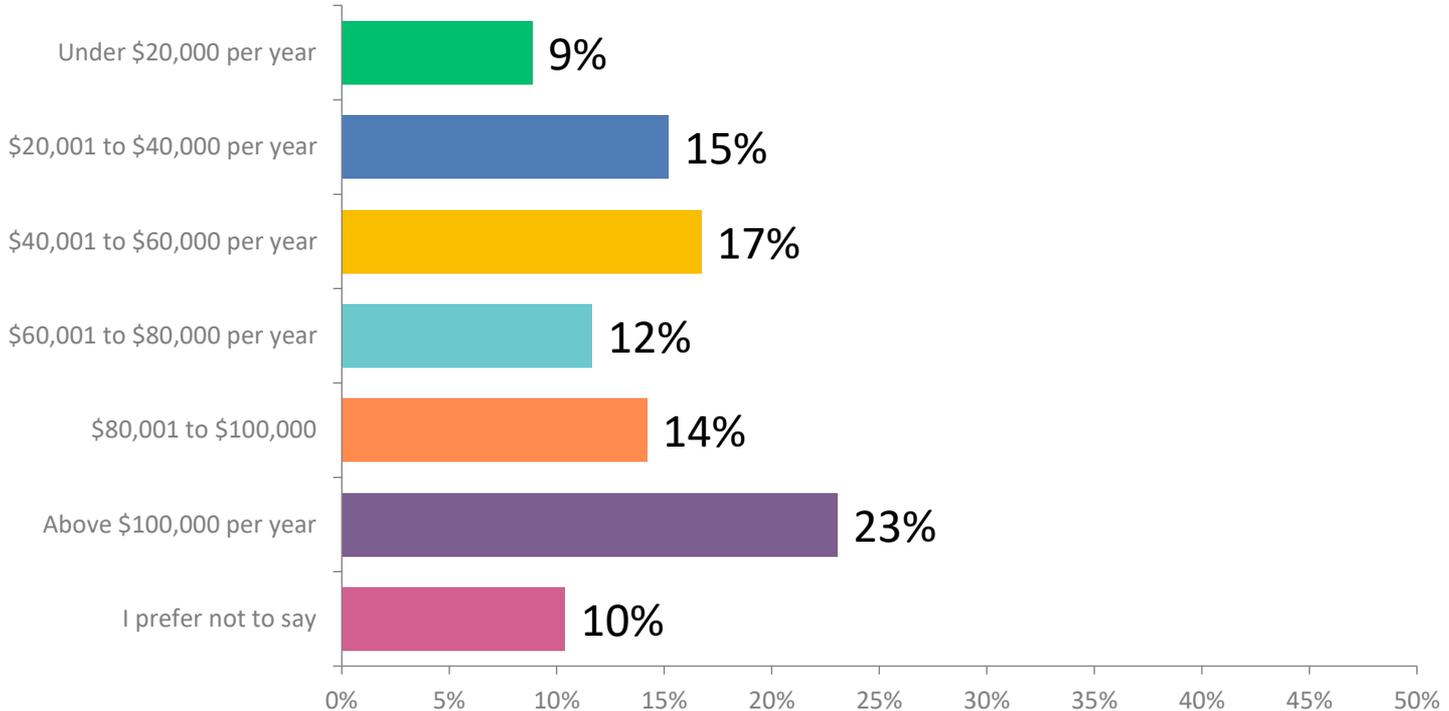
# What type of housing do you live in?

Answered: 395 Skipped: 0

ANSWER CHOICES	RESPONSES	
Stand-alone house	56.20%	222
Apartment or condominium	28.35%	112
Townhome or duplex	7.59%	30
Manufactured home in a manufactured/mobile home park	6.33%	25
Other (please specify)	0.76%	3
ADU or mother-in-law unit	0.51%	2
Group housing (dorm, shelter, etc.)	0.25%	1
TOTAL		395

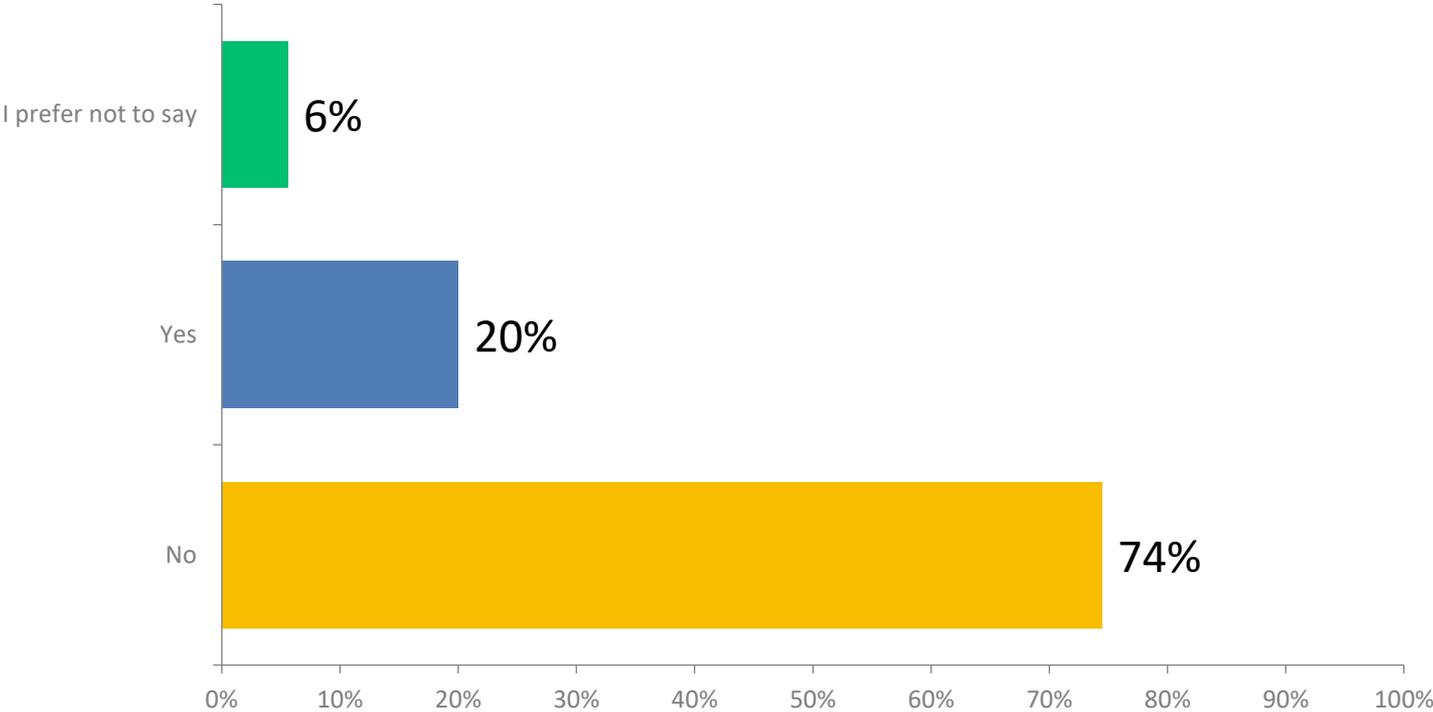
# What is your household income?

Answered: 395 Skipped: 0



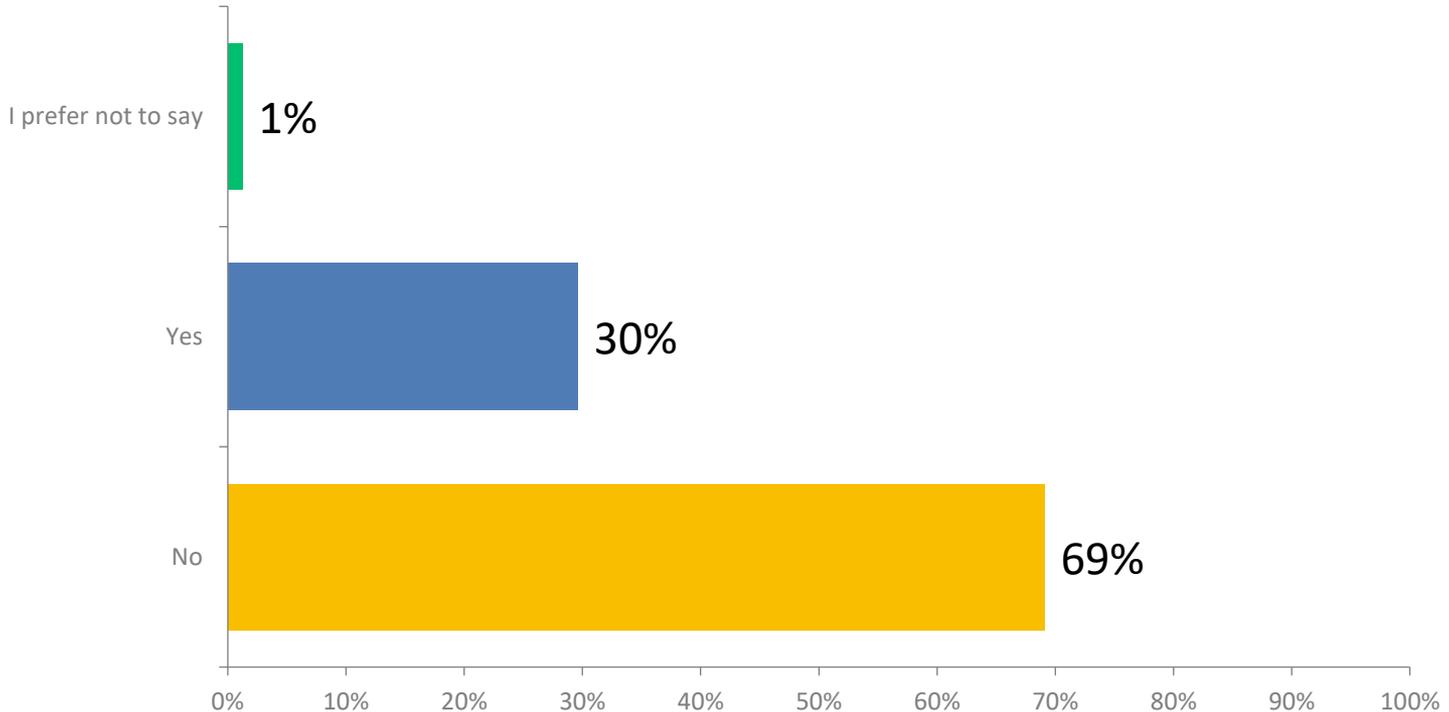
# Do you or a member of your household have a disability?

Answered: 395 Skipped: 0



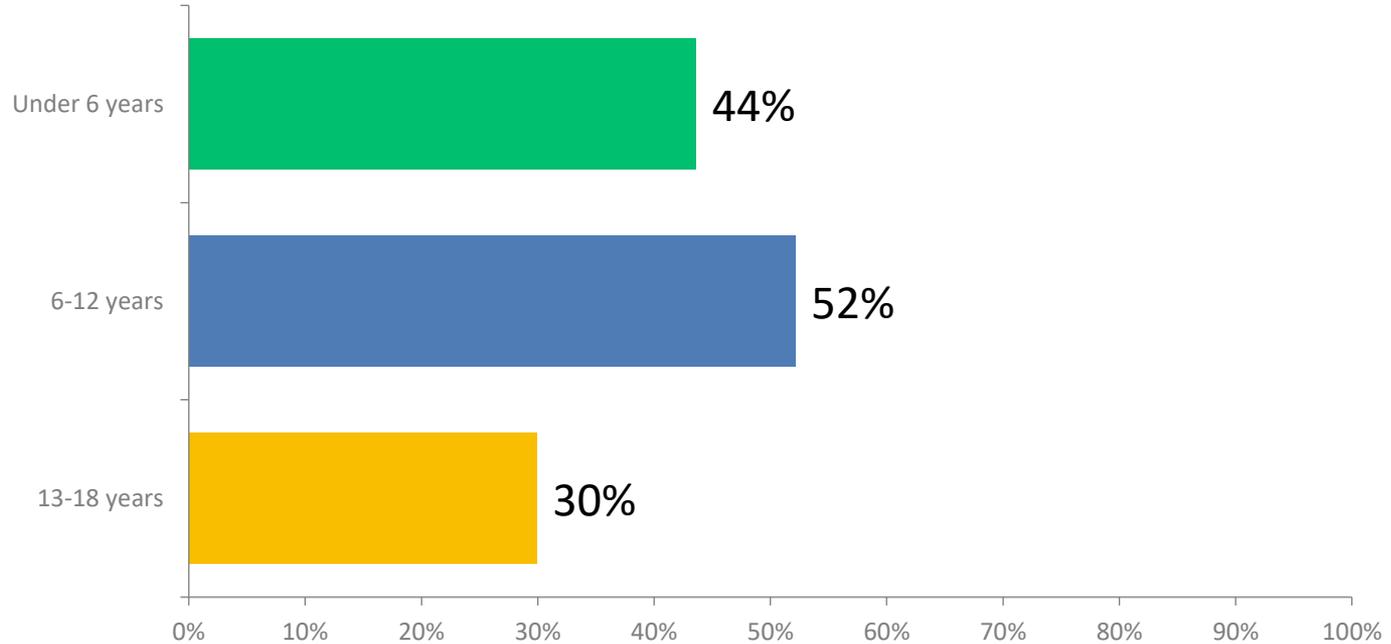
# Do any children live in your household?

Answered: 395 Skipped: 0



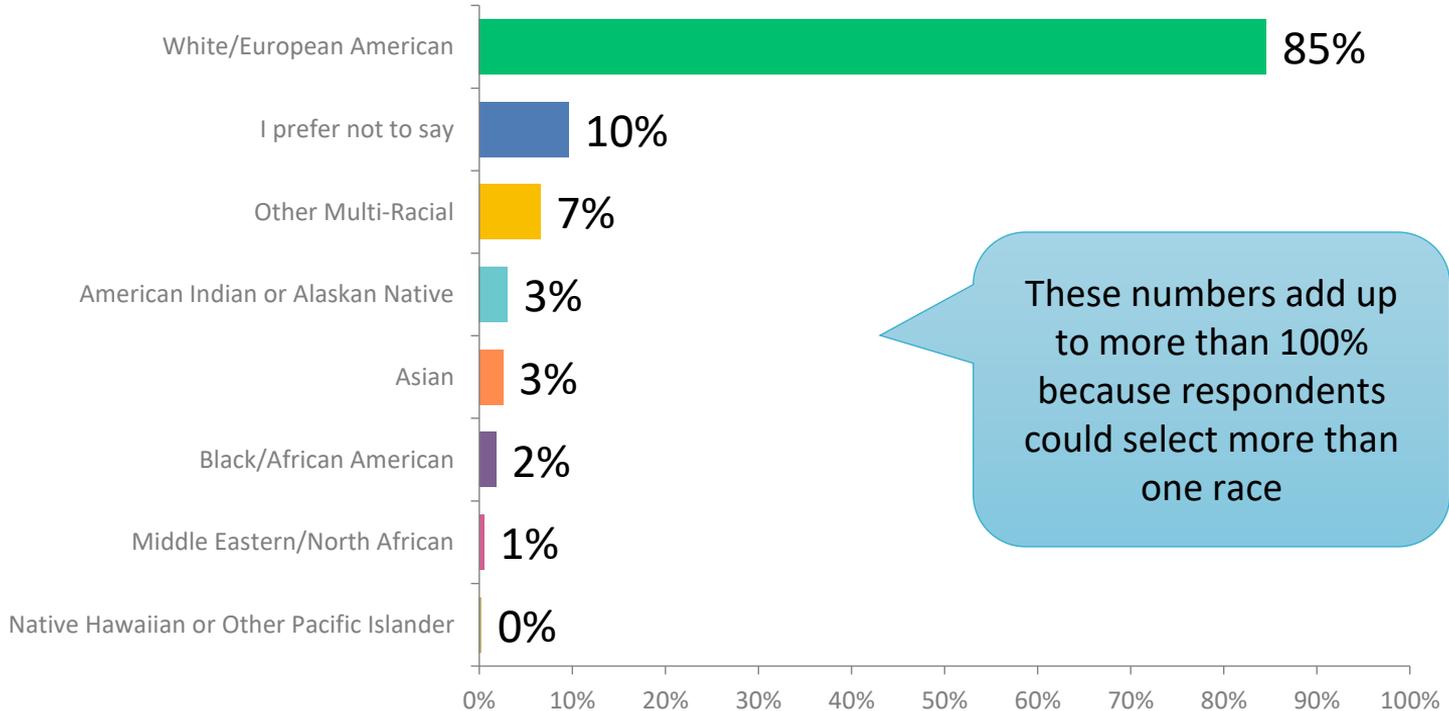
# If yes, what are the age(s) of the children?

Answered: 117 Skipped: 278



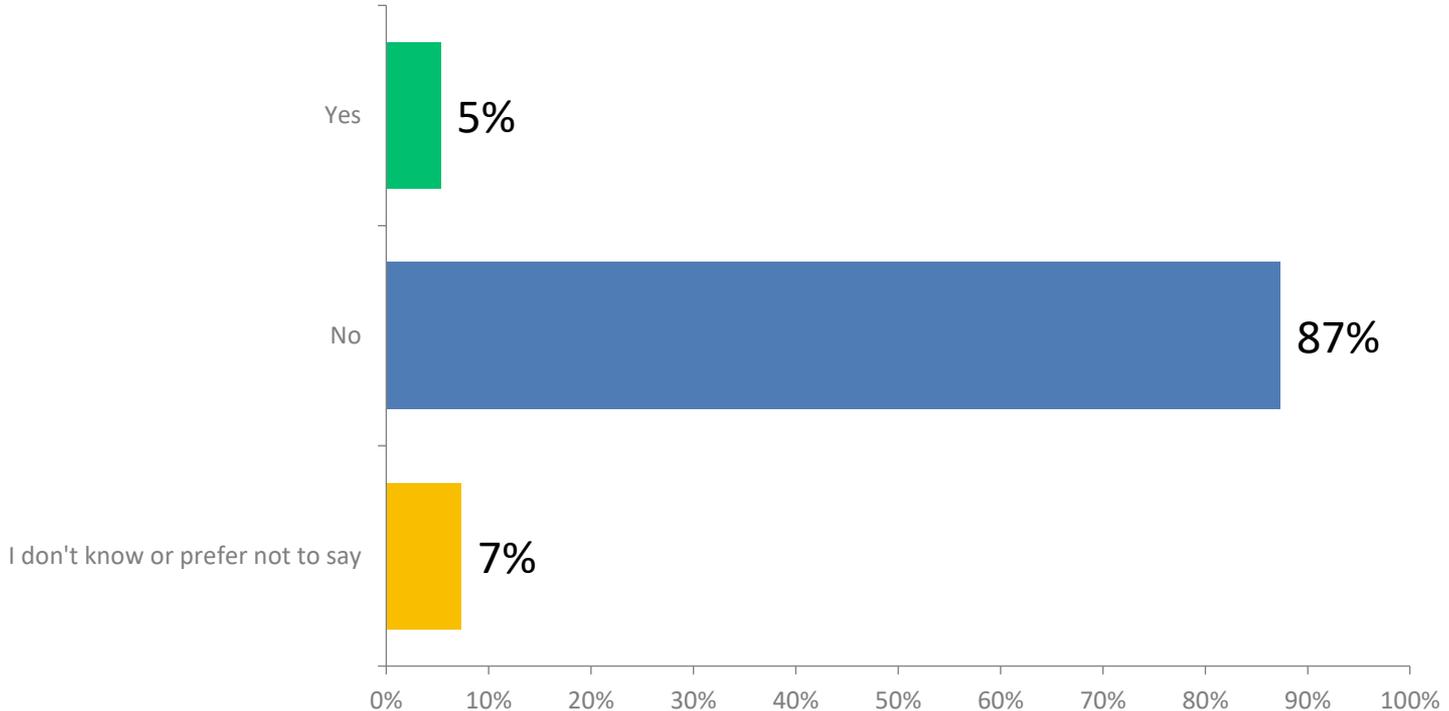
# What is your race? (please select ALL that apply)

Answered: 395 Skipped: 0



# Are you Hispanic or Latino(a)?

Answered: 395 Skipped: 0



# Here is how our respondents compared to Bellingham's overall population

Bellingham's demographic data is based on 2020 Census; sources can be found at [data.census.gov](https://data.census.gov)

- **There is an overrepresentation of homeowner respondents:** 59% of respondents own their home and 37% rent, compared to 55% renters and 45% homeowners in Bellingham's general population.
- **The survey respondents were roughly representative of Bellingham's predominant racial groups,** where 82% of the population identifies as White alone, and 5.8% identify as being multi-racial. Of our survey respondents, 85% identified their race as White alone. The second largest group identified as multi-racial (5%). **People who identify as Asian were underrepresented in our survey results** (only 0.8% of respondents, compared to 5.6% of Bellingham's population).
- **There was an underrepresentation of respondents who identified as being of Hispanic or Latinx ethnicity.** Twenty-one respondents (6%) identified as Hispanic or Latinx, which is significantly lower than the overall 9.6% Hispanic population of Bellingham.
- **20% of respondents have a member of their household who is disabled,** which is consistent with the 12.5% of Bellingham residents who have a disability.
- Most survey respondents live in either a 2-person (42%) or 1-person (21%) household. This is similar to Bellingham's average household size, where about 70% of the population lives in either a 1- or 2-person household.
- **We had an overrepresentation of families with children;** 18.5% of households in Bellingham have children under 18 years of age, while nearly 30% of the survey respondents have children living in the home.