



# 2023 – 2027 CONSOLIDATED PLAN

## CITY OF BELLINGHAM, WASHINGTON

*(covering the period from July 1, 2023 – June 30, 2027)*

**DRAFT FOR PUBLIC COMMENT**

**February 27, 2023**

This version of the Bellingham Consolidated Plan uses the questions and tables required by HUD's Integrated Disbursement and Information System (IDIS). For a more succinct summary, please view the draft Consolidated Plan Overview, published simultaneously, and available in the same locations as this version (online, at the Planning Department, and in the Bellingham Library branches). Please contact the Community Development Division, Department of Planning & Community Development, at [cd@cob.org](mailto:cd@cob.org) with any questions or comments, or visit <http://www.cob.org>.

Draft for public comment

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## Executive Summary

### ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

The City of Bellingham (the City) remains a desirable community to live and has seen population increase over the past five years at a rate that is steady, and in line with regional growth. As such, demand for housing – especially housing that is affordable to residents earning under the median income – is high. This keeps many people in housing that is too expensive, known as housing cost burden. Overall, 39% of all households are cost burdened. But cost burden is especially common among renters; 56% of renters in Bellingham are cost burdened, compared to 24% of homeowners.

Cost burden compounds other social problems, making it harder for households to pay for other necessities such as transportation, food, and medical bills. The community has seen an increase in the need for services that are complimentary to housing stability, such as domestic violence, mental health, substance abuse and housing case management supports.

The previous Consolidated Plan called out poverty among seniors and families with children as a major concern. Unfortunately, we have seen this trend intensify and – as the most extreme outcome – a significant increase in the number of disabled seniors and families with children who are becoming homeless. In 2022, 320 homeless families with children applied for services from the Homeless Service Center, which is a 71% increase from 2018. Similarly, senior households over age 60 increased from 90 applicants in 2018 to 155 in 2022 (a 72% increase). Domestic violence is also a major contributor to family homelessness. During 2022, the number of households fleeing domestic violence also increased from 44 in January to 190 in December. In early 2023, a full 27% of the homeless households who had applied for services were fleeing domestic violence.

With these trends in mind, affordable housing and human services are especially needed for:

- Homeless households, with a priority to those who are most vulnerable, including families with children
- People who are medically fragile
- Seniors on fixed incomes
- Victims of domestic violence
- Households at risk of losing their housing

In addition to those who simply cannot afford a suitable place to live within their budget, a separate but important trend is that the number of households who also require intense case management and other behavioral support services to access and maintain permanent housing. These households often have multiple complicated challenges such as mental health disability, substance use disorder, domestic violence, history of eviction, or other barriers to housing and employment. Those with special needs require more than just an affordable home to remain stable; waitlists for case management supports and permanent supported housing environments are long, and the social service community cannot meet the present need.

Based on the information gathered from available data sources and public feedback received to date, the following goals are recommended for the 2023-2017 planning period:

- 1) Reduce housing cost burden for low- and moderate-income households
- 2) Provide vulnerable households with services to remain stably housed
- 3) Help vulnerable households to meet their basic needs
- 4) Increase safety for unhoused vulnerable populations
- 5) Prevent housing discrimination and increase protections for low-income renters

## **2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

Bellingham's economy is strong, incomes have risen, and the city offers equitable public services and amenities available to all residents. However, this has not translated to housing stability for our lower income residents. The highest priority needs in the City of Bellingham are for affordable housing, housing services, basic needs (i.e., food, hygiene, social connection), safe shelter, and Fair Housing education and enforcement.

Affordable housing and human services are especially needed for the following populations:

- Families with children, especially single-parent families
- Homeless individuals and families with children
- People who are dealing with disability, mental health, or addiction
- People who are medically fragile
- Seniors on fixed incomes
- Victims of domestic violence

## **3. Evaluation of past performance**

Looking back at prior Consolidated Annual Performance and Evaluation Reports, Bellingham has generally done well with the numeric goals the City has set for itself, especially when it comes to program areas that can be broadly supported by local funds as well as federal funds. Supportive services have delivered housing and basic needs supports that have touched over 40,000 individuals since the 2018 Consolidated Plan began. The City has supported six acquisition and/or acquisition/rehab projects adding supportive housing that serves up to 43 individuals at any given time for those with developmental disabilities, recovery needs, mental or physical health needs, or for those who are underage youth or homeless-upon-entry.

The City has also supported the acquisition and/or new development of affordable housing units in 9 different projects, with 5 of those adding 316 units to the City's affordable housing inventory to date, and 4 more in development reflecting another 238 units to come. The preservation program continues to serve many very low-income homeowner households through the home rehabilitation program and the manufactured home repair program (both serving about a dozen households per year). The City has been slower to add community facilities (supporting one neighborhood resource center, and one group home in recent years), and homeownership opportunities (supporting 29 new or resale units). Regardless of how well the local efforts have succeeded in meeting goals, the needs far surpass the ability and resources available to meet them, and the gaps between local wages and the costs of housing and other essential needs continue to demand more dollars per service unit, making similar dollar amounts stretch less far over time.

**4. Summary of citizen participation process and consultation process**

Bellingham has a Community Participation Plan that guides the process of engaging with the public in all the HUD-related planning and reporting efforts. The citizen participation process for this Consolidated Plan began in February 2022, in tandem with the initiation of the Assessment of Fair Housing update. Numerous methods were used to solicit feedback from both the community at large and from targeted groups, including surveys, focus groups, and workshops. This summary will be completed after the public participation process concludes. In the meantime, the Community Participation Plan is available here: [Community Participation Plan \(cob.org\)](#).

**5. Summary of public comments**

To be completed after the public participation process.

**6. Summary of comments or views not accepted and the reasons for not accepting them**

To be completed after the public participation process.

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

**1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	BELLINGHAM	
CDBG Administrator	BELLINGHAM	Planning and Community Development
HOPWA Administrator		
HOME Administrator	BELLINGHAM	Planning and Community Development
HOPWA-C Administrator		

**Table 1 – Responsible Agencies**

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## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

### **1. Introduction**

**Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).**

The City partners with the County to operate several behavioral health response programs. The Ground-level Response and Coordinated Engagement (GRACE) program was developed to address the needs those who frequently use police, fire, hospital, jail, and emergency services. The Bellingham Police Department’s Behavioral Health Officer and the Fire Department’s Community Paramedics work with the Whatcom County Health & Community Services (WCHCS) department’s caseworkers to provide intensive case management and coordination of services for people once they become a GRACE member. GRACE Intensive Case Managers work in a team, drawing from the services provided by over two dozen community partners.

The County’s Law Enforcement Assisted Diversion (LEAD) program is a community-based effort to find solutions for individuals who are high utilizers of criminal justice systems. The aim is to lead people out of the criminal justice system and into intensive case management where those who are dealing with behavioral health issues can have their needs met appropriately. LEAD works with people with multiple low-level criminal offences who are experiencing hardships such as mental illness, drug use, and extreme poverty. The City’s Police Department collaborates in implementation of this program.

In 2023, the City and the County launched the Alternative Response Team (ART) to respond to certain emergency calls as an alternative to those 911 calls going to law enforcement. ART is also housed under WCHSC and is a response for community members experiencing behavioral health crisis.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness**

Whatcom County is the lead agency for the Continuum of Care and the Plan to End Homelessness. Both the City and County fund the Whatcom Homeless Service Center, which administers the Coordinated Entry / HMIS system for the community.

Representatives from the City sit on several committees together focused on addressing homelessness. This includes the Whatcom County Housing Advisory Committee and the Whatcom County Coalition to End Homelessness.

City and County staff meet every other week to address community needs and collaborate and strategize on funding those needs – the City and County have different funding sources. For example, the County has a behavioral health fund while the City’s sources are primarily focused on housing and housing services. In 2022, recognizing the growing number of families with children experiencing homelessness, the City increased its capital contribution to Mercy Housing Northwest’s Trailview project to the agency could lease more housing units to families currently staying in shelter. Meanwhile, the

County contract with Mercy Housing so they could hire a case manager to support those families entering permanent affordable housing.

In addition, the City convened a group of service providers focused on families with children to develop a strategy for addressing this emergent need. With support from a local foundation, the City engaged with a consultant to do a feasibility study of a shelter spaced dedicated to families with children, and worked with relevant stakeholders to

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS**

The City also regularly consults with the Whatcom County's department of Health & Community Services Department (WHCS) as the lead agency for the local continuum of care. City representatives participate in County advisory committees that make recommendations and provide input on fund allocation, performance standards, and evaluation of outcomes. WHCS also works very closely with the Homeless Service Center managed by the Opportunity Council to manage the HMIS system. The City requires agencies funded for homeless housing and homeless housing services to participate in HMIS and coordinated entry, and regularly coordinates with WHCS about the agencies which are mutually funded. The City's investment in services funding for those experiencing chronic homelessness has increased over the past five years due to inadequate funding available from the county.

**2. Describe Agencies, groups, organizations, and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities**

The city consulted with community housing and service providers, during the development of the Consolidated Plan through longstanding engagement with other housing, social services, and community focused entities. Staff also conducted targeted outreach to specific community groups for relevant sections of this plan. These include:

- **Healthy Whatcom** – Healthy Whatcom is the name of the current Community Health Improvement Plan, coordinated by the Whatcom County department of Health & Community Services and PeaceHealth, which have conducted a multi-year analysis, prioritization, and evaluation process to select goals and address key determinants of health in Whatcom County. One of the three priorities chosen was “increasing stability through housing for families and children.” City staff have been involved throughout this process, sitting on housing-related committees, and assisting with several workshops.
- **Ageing Well Whatcom** – convened by the Chuckanut Health Foundation, Ageing Well Whatcom is an initiative aimed at addressing the needs of older residents in Whatcom County. City staff have partnered with Ageing Well Whatcom on community education and outreach events and giving feedback on the Ageing Well Whatcom Blueprint and subsequent update. The blueprint has a strong focus on housing for seniors.
- **The Whatcom Housing Alliance** – The City is a founding member of the Whatcom Housing Alliance (WHA), an organization of non-profit, government, and for-profit agencies and businesses that have a shared mission to create opportunities for more diverse housing choices in all neighborhoods that will contribute toward equitable, prosperous, healthy, and vibrant communities for everyone. The city has a position on the steering committee, which meets

monthly. The WHA has over 40 member organizations, and coordinates community education and outreach events related to housing, such as Whatcom Housing Week (each October) and the Bellingham For Everyone Learning Series (bi-monthly).

- **Whatcom Landlords & Housing Professionals** – A group of housing professionals that work with low-income residents came together in 2022 to form the Whatcom Landlords & Housing Professionals network, with the intention to work collaboratively with local landlords, property managers, property owners and affordable housing professionals to address the rental housing crisis. This group is made up of representatives from the Bellingham/Whatcom County Housing Authority, City Bellingham, Lydia Place, the Opportunity Council, Northwest Youth Services and Western Washington University.
- **Agencies serving Families with Children** – In 2022, reports of families experiencing homelessness increased dramatically. The increased reliance on and duration of motel stays to accommodate these families led the City of Bellingham to convene experts from Lydia Place, Whatcom County and the Opportunity Council to define the problem and begin developing solutions - a Families with Children response strategy. The City and WHCS convened a workshop of approximately 40 stakeholders on January 25, 2023, to review the draft strategy and provide feedback. Workshop attendees included representatives from:
  - City of Bellingham
  - City of Ferndale
  - Whatcom County Health Department
  - Lydia Place
  - Opportunity Council
  - DVSAS
  - Interfaith Coalition
  - Lighthouse Mission Ministries
  - Bellingham Housing Authority
  - Bellingham School District
  - Blaine School District
  - Lynden School District
  - Ferndale School District
  - Meridian School District
  - Whatcom Community Foundation
  - Chuckanut Health Foundation
  - Mount Baker Foundation

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	OPPORTUNITY COUNCIL
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization provided data from the Housing Pool which was analyzed for the Homeless Needs Assessment. As a result, the city could clearly see trends and outcomes had changed since previous Consolidated Plan period. Org representatives also participated in public processes, families with children workgroup, and Community Development Advisory Board, providing feedback and review throughout Consolidated Plan development process.
2	<b>Agency/Group/Organization</b>	Bellingham Whatcom County Housing Authorities (BHA)
	<b>Agency/Group/Organization Type</b>	PHA

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Market Analysis Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Data was provided by the BHA on number and condition of units, number of vouchers, project-based vouchers, and waitlists. This data was critical to the housing needs assessment. The BHA also has a representation on the Community Development Advisory Board providing feedback and review throughout Consolidated Plan development process.
3	<b>Agency/Group/Organization</b>	Lydia Place
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Key participant in the families with children strategy workgroup, helped to develop the goals and strategies for addressing homelessness among families with children, and presented at the community workshop.
	<b>Agency/Group/Organization</b>	Domestic Violence & Sexual Assault Services

	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided data and context for the needs around families with children and needs of homeless households fleeing domestic violence.

**Identify any Agency Types not consulted and provide rationale for not consulting**

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care and A Home for Everyone: Strategic Plan to End Homelessness	Whatcom County Department of Health & Community Services; Whatcom County Coalition to End Homelessness	The Strategic Plan to End Homelessness is updated periodically and is our regional blueprint for addressing homelessness. Many of the strategies in this plan are overlapping; both share a focus on increasing the supply of affordable housing, prevention and diversion whenever possible, and adding more permanent supportive housing for those with higher needs.
Community Health Improvement Plan (CHIP)	Whatcom County Department of Health & Community Services; Peace Health	One of the three main strategies identified in the CHIP is “increasing stability through housing for families and children,” a key component of this plan.
Aging Well Whatcom Blueprint	Chuckanut Health Foundation	Housing is one of the six focus areas for which the blueprint identifies recommendations for older adults and their families.

**Table 3 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))**

The city coordinated with the Office of Emergency Management (OEM) on the Hazard Mitigation portion of the plan, and the Port of Bellingham on the Non-Housing Community Development assets. We coordinate regularly with these agencies on areas where their expertise is needed to implement portions of our plan, such as business development or disaster preparedness for low-income and vulnerable groups.

**PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)**

**1. Summary of citizen participation process/Efforts made to broaden citizen participation  
Summarize citizen participation process and how it impacted goal-setting**

The citizen participation and outreach to-date is summarized in the table below. A complete description of how all comments received and how it impacted goal-setting will be incorporated into the final version of the plan.

**Citizen Participation Outreach**

Draft for public comment

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Engage Bellingham (Website)	Non-targeted/ General public	12 Public comments (to date)	A main concern among the comments posted on the website addresses access to housing. From increasing rents to fluctuating living wages, the comments point out issues within the Bellingham housing market. Suggested solutions include adding rental units in SF areas, subsidizing building materials, addressing For-profit renting, keeping profits in-state, utilizing private-housing to support construction of more housing, addressing 'affordability' with landlords so they know the legal expectations of wealthy vs affordable rentals, limiting rental increases, remember low-to-middle income individuals/families who cannot receive certain services but may need support services to acquire housing, establish a city minimum wage.		<a href="https://engagebellingham.org/consolidated-plan">https://engagebellingham.org/consolidated-plan</a>

Draft for public comment

2	Survey (online and written)	General Public	395 surveys completed	<p>Participants were asked to rank ideas the city is currently working on, whether they approve of proposed ideas, and about personal discrimination experiences related to housing. Of the methods currently being used by the city, participants identified construction of permanently affordable apartments, assistance to help low-income households purchase a home, and home repairs for low-income, disabled, and elderly homeowners as top priorities the city should continue focusing on.</p> <p>Setbacks to access housing were identified by 150 participants; 19% said rising housing costs were a main contributor that impacts access to housing, 12% noted that opportunity is hindered by discrimination or prejudice, 11% noted that private investors are key players in the monopolization of local housing, about 10% claimed extensive rental requirements made it difficult for tenants to secure housing, 9% found issues that limit property owners in either building or land use regulations, about 7% noted that differences in public interest influence planning outcomes, about 7% highlighted the gaps in connectivity with local transportation, about 7% found that local job availability and wages were not meeting the changing requirements of housing, 6% pointed out the limitations of zoning in Bellingham, 6% noticed that social services and healthcare should be more easily accessible to support vulnerable populations; 5% wrote about accessibility issues related to home ownership, about 5% commented on the increase of housing costs due to the student population, 2% recognized retaliations from landlords as a threat to Fair Housing.</p> <p>Others commented that the language in the survey was jargon and did not reflect the real questions and concerns of community members. This comment is noted, and staff will attempt to create surveys with more relevant and accessible language whenever possible.</p>	<p>“This question is vulnerable to discriminatory re-purposing. Owners are notoriously prioritized by the city”</p> <p>Does not describe alternative mode of housing.</p> <p>“What is Fair? My data shows that life is not fair. Some people work harder than others, finish school, get to work on time, do not abuse their employer, don't call out, avoid alcohol and drug abuse, delay gratification by saving some income, obey the laws, and live within their means. These people can afford their rent or buy a home. The opportunity is there. The problem is how do you get people to follow these rules. Housing won't be fair until people do their fair share of work. Socialism does not work. There are plenty of jobs...people must have the initiative to work and start small”</p> <p>Similar to the comment above, it does not address question 17.</p> <p>“Individuals not taking advantage of opportunity but rather relying on handouts. It takes work and sacrifice to get ahead. People want instant gratification”</p> <p>Similar to the comment above, it does not address question 17.</p>	<p><a href="https://www.surveymonkey.com/r/housingequity-COB">https://www.surveymonkey.com/r/housingequity-COB</a></p>
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Draft for public comment

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Survey through Bellingham School District newsletter	Hispanic; Parents/Families with young children  This survey targeted Hispanic households and families with children because these groups were under-represented in the general community survey.	141 surveys completed  Over 80% of respondents' household income is \$60,000 or less, and 92% of respondents identified as Hispanic.	Participants support initiatives for low-income households to purchase a home, home repairs for low-income, disabled, and elderly homeowners, and the construction of permanently affordable apartments as ways the city can support housing equity. Participants identified multiple methods to improve equitable access to housing. Those methods include requiring all large developments to include some affordable housing for low-income residents, adding more protections for tenants, like longer notice before rent increases, and supporting resident-owned manufactured homes parks. About 29% of participants said they have experienced housing discrimination.  In the open-ended question, about 35% wrote about accessibility issues related to home ownership, about 28% commented on rising housing costs, about 21% pointed out the hindrance of extensive rental requirements, 17% inquired about rental assistance, 10% mentioned issues related to tenant rights, 10% noted that opportunity is hindered by discrimination or prejudice, about 7% highlighted the need for social services for marginalized groups (i.e., single mothers and low-income families), 3% identified gaps in communication and emphasized language accessibility, and 3% address the need for more areas of park and recreation around low-income neighborhoods.		<a href="https://www.surveymonkey.com/r/COB_BSD">https://www.surveymonkey.com/r/COB_BSD</a>
4	Presentation at virtual community meeting	Residents of manufactured home parks (MHPs)	48 attendees total in two meetings	Two community meetings were given by Planning & Community Development staff to discuss potential changes to the zoning of MHPs in the city. All MHP residents were invited to the online event, with Spanish translation provided. Staff briefly explained how the Assessment of Fair Housing & Consolidated Plan relate to the needs of MHP residents and		<a href="https://cob.org/gov/dept/pcd/major-projects/manufactures-home-park-preservation-strategies">https://cob.org/gov/dept/pcd/major-projects/manufactures-home-park-preservation-strategies</a>

Draft for public comment

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
				<p>encouraged attendees to complete a survey or provide comment.</p> <p>Comments received were in general supportive of the city's efforts to protect MHPs from development, but unsure how residents could afford to purchase the land on fixed incomes. Other comments provided via the survey expressed that the city should offer financial assistance or other support to help park residents purchase the land on which their homes are located, as they provide affordable housing for low-income residents.</p>		
5	Focus group	Residents of public housing; low-income residents; Seniors	7 attendees	<p>Residents of Bellingham Housing Authority properties Lincoln Square, Varsity Village, and Washington Square came to an in-person focus group hosted at Lincoln Square.</p> <p>Several residents noted that they would be homeless if it were not for services available in the community, and if they had not obtained subsidized housing. One resident was formerly homeless and mentioned the difficulty of accessing services when you don't have a physical address. In general, the trend for all kinds of applications moving to online only is a challenge for seniors and those with disabilities. One person commented that there is a step missing between the Mission (emergency shelter) and subsidized apartments, and that people need to learn how to live in the community. Others agreed that we need more temporary and transitional housing.</p>	Comments related to operations, policies, or building management were passed on to the Bellingham Housing Authority.	
6	Virtual listening session	Seniors	4 attendees	<p>A listening session was convened by Aging Well Whatcom with local housing providers and policy experts.</p> <p>Four seniors attended and offered a variety of suggestions and comments. In general, there was interest in more shared housing options where</p>		

Draft for public comment

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
				<p>seniors could pool their resources and have a sense of community, while still having privacy and autonomy. Current zoning does not allow for this option in many places. Other comments centered on design with seniors in mind, such as in-unit washers and dryers, elevators, outlets placed higher off the ground, and walk-in showers. The group discussed the relationship between housing and transit, and how with more walkable access to groceries and pharmacies, parking would not be as needed. Several attendees said they would “love” to give up their cars, but current infrastructure does not make that possible.</p>		

Draft for public comment

7	In-person events at Villa Santa Fe and Sterling Meadows	Residents of public housing; Low-income residents; Families with children	100+ attendees; 21 hardcopy surveys completed	<p>This survey asked participants about the different types of services they have used in Bellingham and how well those services are working. Participants were also asked which services were not working well for them, and what, if any, other kinds of community services they felt were missing.</p> <p>81% of respondents said they utilized mental health or therapy resources, followed by the food bank/food pantry. About 71% of participants mentioned using community healthcare clinics and dental providers. Almost 67% of respondents said they utilize the information centers at their children’s schools.</p> <p>For services that work well, 38% of participants said they found community services such as those related to housing and transportation the most useful. 33% said the Food Banks work well, and 19% of respondents mentioned programs for youth and healthcare.</p> <p>For services that are not working well, 14% of respondents said housing services could use improvement, and a few also experienced issues when accessing community health services. Other respondents also mentioned safety services because they wanted a better sense of security in their neighborhoods. One participant said there should be more, bilingual speakers in community service positions, childcare options, and financial literacy programs.</p> <p>For services that participants would like to see, respondents noted the need for more health services, rental assistance, and childcare. Others suggested offering more language classes, expanding public transportation, and increasing domestic violence support services and non-profits.</p>		
8	Max Higbee Center	Residents with developmental	42 attendees	The city coordinated with the Max Higbee Center, a day center for adults and youth with developmental	<i>Other comments or questions not relevant to the Consolidated</i>	

Draft for public comment

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
	"Meet the City" event	disabilities and their families		<p>disabilities, to host an event. Members and their families were invited to hear from city staff about multiple plans and provide in-person feedback about their opinions and needs.</p> <p>Several members provided comments about the need for more housing options for adults with developmental disabilities (DD). Some mentioned the strain of aging parents trying to secure long-term support for their adult children with DD. Some suggested a "community housing" model where young adults with DD could pair up with seniors and support each other and share resources. They urged more flexible zoning and creative solutions, where appropriate. For example, duplexes and housing with private rooms and shared common areas.</p>	<p><i>Plan could be directed to other staff from other city departments. Staff from Parks, Public Works, and Library were in attendance.</i></p>	

Draft for public comment

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
9	Online survey	Housing professionals (case managers, landlord liaisons, mediators, attorneys)	20 survey respondents	<p>To gain a broader perspective, his survey targeted professionals who work with low-income renters as well as property owners. This survey focused on Fair Housing, but also included some questions around Consolidated Plan priorities.</p> <p>This group reported that housing discrimination is common for their clients, especially source of income discrimination. Respondents in general were wary of adding more laws and requirements for property owners, and felt the main problem is a lack of enforcement and adherence to existing laws. Some noted that housing is already a complex and heavily regulated environment, and more restrictions might have unintended consequences of making property managers even more hesitant to participate in programs that benefit low-income renters or those without a strong credit or rental history, essentially making it harder to find housing for those who are most vulnerable. They advocated for more education, incentives or recognition programs instead of more rules or penalties, which are difficult to enforce.</p>		

Draft for public comment

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
10	Online survey	<p>Renters, Young people</p> <p>Young adults and renters were underrepresented in previous outreach efforts. This survey targeted Western Washington University &amp; Whatcom Community College students, who were predominantly renters and under age 34.</p>	181 surveys completed	<p>Participants were asked about their preferred criteria for housing, levels of support the City should prioritize, to identify issues related to housing, to rank needed public facilities, and identify populations and geographic areas that need more support.</p> <p>The average survey respondent was cost burdened and almost 79% of participants live with at least one other person. For housing criteria, participants mainly prioritize cost, proximity to school, and ability to have pets when searching. The top three issues related to housing show that 86% of respondents think rents are increasing too much, about 32% identified a lack of housing options that meets needs, 24% noted the shortage of human services. Other issues mentioned include structural integrity of homes (poor conditions), and unresponsive landlords. Participants also shared ideas about which geographic areas could use improvements. Around the Cordata/Meridian &amp; the Barkley/Sunset areas, individuals identified this could be a good place to build more housing, especially since WCC is in Cordata. Similarly, participants urged for more student housing around Sehome. In Birchwood, people asked for affordable food options or a grocery store. In Happy Valley, people identified a lack of healthcare options. Respondents asked for enforcement of necessary home renovations (rentals).</p>	<p>Around Samish Hill, in front of Lark Apartments, multiple people urged for a crosswalk since this street is home to many students and senior residents. In general, repair of roads and a wider bus system that connects more people from the county to Bellingham were also requested.</p> <p><i>Comments regarding geographic priorities were beyond the scope of this plan, specifically around crosswalks. These suggestions can be passed on to our transportation planners in Public Works.</i></p>	<a href="https://www.surveymonkey.com/r/FJX89FX">https://www.surveymonkey.com/r/FJX89FX</a>

Draft for public comment

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
11	Focus group	Renters; young people	3 participants	<p>Regarding personal experiences as renters in Bellingham, participants spoke about the application process, landlord accountability, lease literacy, and access to housing resources. Participants also spoke about needed structural improvements around the city, and the potential impacts of increasing rental prices.</p> <p>Participants brought up the stacking costs of applications, or how some rental companies continue accepting applications even when one application is already processed. Participants brought up how as rents continue rising, low-income renters may get pushed into worse (structurally unsafe) housing, putting more people in vulnerable positions. Participants also pointed out that many young renters do not completely read through their lease, and that there should be a workshop or some events that teach lease literacy to renters. Accessing housing resources, participants said these resources should be accessible online, in person, and on the phone, since there is still stigma and cultural barriers associated with rental/ housing assistance.</p>	<p>“Students obtaining health insurance after they move to Bellingham is something many put off”</p> <p><i>City does not handle health insurance</i></p> <p>“Bus system is good for getting to central locations, non-central locations are difficult to access”</p> <p><i>Transportation related issue, not community development</i></p>	
12	Emails and written comments			A summary of all written comments received will be included in the final Consolidated Plan		

Table 4 – Citizen Participation Outreach

## Needs Assessment

### NA-05 Overview

#### Needs Assessment Overview

Like many other cities in our region, Bellingham has seen continued population growth and dramatically increasing housing costs over the past five years, while vacancy rates remain low. There are not enough affordable rental units or homes to purchase for low- and moderate-income residents. This is primarily a function of the fact that rents and home values have risen much faster than wages in recent years, and new construction primarily provides high-end rental units which are unaffordable to those earning below the median income. As a result, 24% of homeowners and 58% of renters in Bellingham pay more than 30% of their income for housing. This rate is higher than both the state and US averages for cost burden. The percent of cost burdened homeowners has decreased since the previous Consolidated Plan, and the percent of cost burdened renters has increased slightly.<sup>1</sup>

A lack of affordable housing contributes to the rise in homelessness because it makes it even more difficult for low-income residents to afford basic needs like food, healthcare, and transportation, or to save enough money for unforeseen expenses. Despite these challenges, the Whatcom County Point-in-Time count shows only a small increase in the number of persons experiencing homelessness on a given night – from 815 in 2018 to 832 in 2022 – while the percent who are unsheltered dropped from 47% to 22%. While this is positive, census count methodology changes annually, and early indicators predict that the 2023 Point-in-Time count is likely to show a sharp uptick in 2023, mainly a result of a more robust count.

Non-White and Hispanic households at some specific income levels are disproportionately cost burdened when compared to the general population and are overrepresented among people experiencing homelessness. Climate change has also increased the severity of our weather, making it more dangerous for people living unsheltered during severe cold, heat, or smoke events. This has increased the urgency to provide safe shelter for vulnerable and unhoused individuals and families.

Affordable housing and human services are especially needed for:

- Homeless individuals and families with children
- People who are dealing with disability, mental health, or addiction
- People who are medically fragile
- Families with children, especially single-parent families
- Seniors on fixed incomes
- Victims of domestic violence

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<sup>1</sup> 2021 1-year ACS data.

## NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

### Summary of Housing Needs

Demographics	Base Year: 2009	Most Recent Year: 2021	% Change
Population	77,584	90,545	17%
Households	32,677	39,496	21%
Median Income	\$37,031.00	\$59,163.00	60%

**Table 5 - Housing Needs Assessment Demographics**

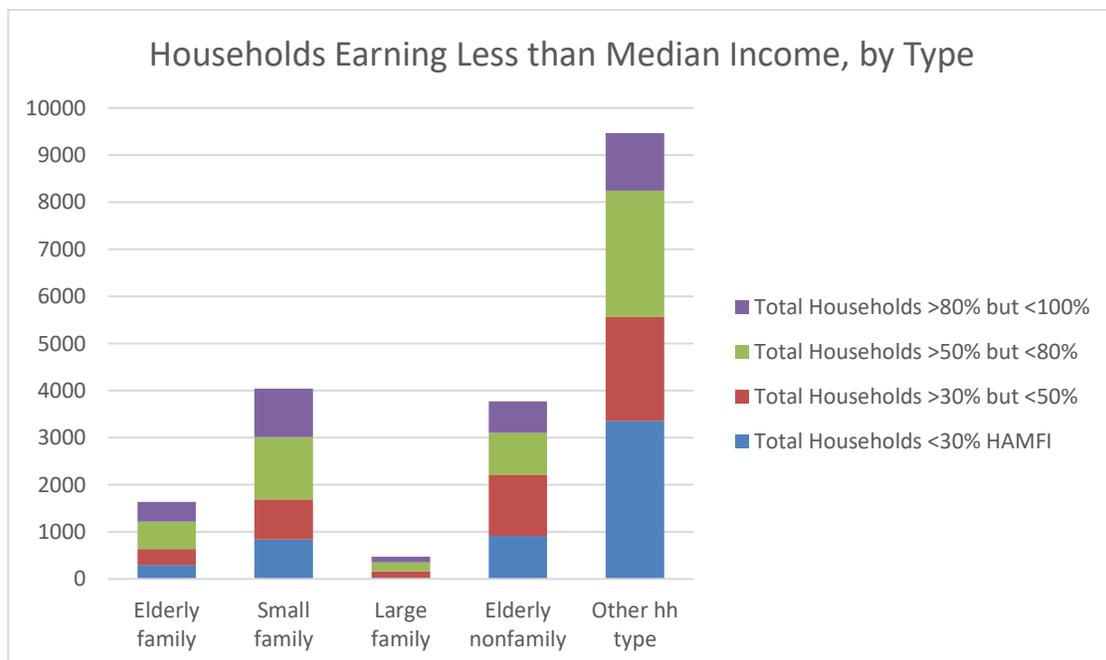
Data Source: 2000 Census (Base Year), 2017-2021 ACS (Most Recent Year - updated)

### Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	6,155	5,000	5,975	3,510	14,660
Small Family Households	1,185	820	1,490	1,115	6,505
Large Family Households	65	175	145	140	770
Household contains at least one person 62-74 years of age	665	935	1,220	720	3,535
Household contains at least one person age 75 or older	700	840	645	665	895
Households with one or more children 6 years old or younger	505	385	565	220	1,425

**Table 6 - Total Households Table**

Data Source: 2014-2018 CHAS



**Housing Needs Summary Tables**

## 1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	200	165	110	175	650	50	0	0	45	95
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	30	20	115	40	205	0	0	0	25	25
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	80	10	95	90	275	0	25	0	0	25
Housing cost burden greater than 50% of income (and none of the above problems)	3,825	1,670	265	40	5,800	570	390	375	130	1,465
Housing cost burden greater than 30% of income (and none of the above problems)	365	1,395	1,720	365	3,845	195	375	650	280	1,500

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	360	0	0	0	360	100	0	0	0	100

**Table 7 – Housing Problems Table**

Data 2013-2017 CHAS  
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	4,140	1,865	585	340	6,930	620	415	375	200	1,610
Having none of four housing problems	645	1,810	3,285	1,685	7,425	290	910	1,730	1,285	4,215
Household has negative income, but none of the other housing problems	360	0	0	0	360	100	0	0	0	100

**Table 8 – Housing Problems 2**

Data 2013-2017 CHAS  
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	894	555	595	2,044	185	115	305	605
Large Related	50	130	35	215	15	20	55	90
Elderly	660	650	365	1,675	385	465	455	1,305
Other	2,815	1,925	1,180	5,920	180	165	210	555

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Total need by income	4,419	3,260	2,175	9,854	765	765	1,025	2,555

**Table 9 – Cost Burden > 30%**

Data 2013-2017 CHAS  
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	890	200	35	1,125	115	60	110	285
Large Related	50	100	0	150	15	20	0	35
Elderly	480	440	165	1,085	275	205	150	630
Other	2,620	1,030	135	3,785	165	105	115	385
Total need by income	4,040	1,770	335	6,145	570	390	375	1,335

**Table 10 – Cost Burden > 50%**

Data 2013-2017 CHAS  
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	100	10	120	90	320	0	25	0	0	25
Multiple, unrelated family households	0	0	0	0	0	0	0	0	25	25
Other, non-family households	10	80	90	40	220	0	0	0	0	0
Total need by income	110	90	210	130	540	0	25	0	25	50

**Table 11 – Crowding Information – 1/2**

Data 2013-2017 CHAS  
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

**Describe the number and type of single person households in need of housing assistance.**

There are 13,511 single-person households in Bellingham, representing about 34% of all households (according to the 2021 ACS 5-year estimate). The median income for 1-person households is \$35,331; a single-person household earning this income could not afford a market rate studio apartment in Bellingham, which is above \$1,400 per month. Although the exact number of cost-burdened single person households is not known, there were 227 single person households on the Bellingham Housing Authority waitlist for the Housing Choice Voucher (HCV) program and 511 single person households on the public housing waiting list. These waitlist applicants were chosen by lottery from over 600 households that applied during a 5-day period in June 2022.

In the November 2022 there were 462 single person households on the Housing Pool, a list of literally homeless households awaiting housing assistance. Although there is undoubtedly some duplication among these lists, the most vulnerable, income-qualified household type in the community is clearly single-person households.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

In the 3<sup>rd</sup> quarter of 2022, the Housing Pool “over three quarters of all client heads-of-household enrolled in this quarter reported disabled status (78%). Disabled households are disproportionately represented in both poverty and homelessness.”<sup>2</sup> For example, of the 676 households active on the Housing Pool (i.e., waiting for a housing placement) in November 2022, in 497 (74%) the head of household had some type of disability. Of these, 368 (54%) reported having a mental health disability and 199 (29%) were medically fragile. The majority (173) of those who reported being medically fragile were unaccompanied adults.

Of the 707 households active on the Housing Pool in January 2023, 27% (194) were fleeing intimate partner violence – meaning that domestic violence was reported as a factor in them being homeless or at risk of homelessness. Even for households who are not actively fleeing domestic violence, it is a common experience. Of the 707 households, 302 reported experiencing domestic violence in the last five years.

The number of shelter beds for those fleeing domestic violence does not adequately meet the need in our county. Domestic Violence & Sexual Assault Services (DVSAS) of Whatcom County reported that 76 unique households sheltered at one of their facilities in 2022. This is a decrease in numbers sheltered before the pandemic, when 99 household were served in 2019, but the decrease is due primarily to the

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<sup>2</sup> Whatcom Homeless Service Center Quarterly Report: Quarter 3 2022 (July to September).

stays being longer, which increased from an average of 72 days in 2019 to 147 days in 2022 – over 100% increase. This recent trend of longer stays in shelter or transitional housing is consistent with other programs that serve clients experiencing homelessness.

**What are the most common housing problems?**

In reviewing Table 7 above, housing cost burden is by far the most common housing problem. While there are an estimated 745 households that have substandard housing (lacking complete plumbing or kitchen), the second most common housing problem, there are nearly ten times as many households that are severely cost burdened, and another 5,345 households that are cost burdened. Housing cost burden affects more than 1 in 3 households in Bellingham and is especially prevalent among renter households. Using more recent census data<sup>3</sup> reveals that a full 58% of renter households are cost burdened. While cost burden has increased slightly over the past decade for renters, it has measurably decreased for homeowner households. This is across all income categories, but not surprisingly, cost burden and severe cost burden is highest among the lowest income groups.

**Are any populations/household types more affected than others by these problems?**

Cost burden is not distributed evenly among different household or family types. It is especially concentrated among households that rent, and non-family households. Elderly non-family renter households are the most cost burdened, with 47% of these households being severely cost burdened. This is followed by “other non-family” households, of which 36% are severely cost burdened. Large family households that rent also experience a high degree of severe cost burden, with 31% of large family households experiencing severe cost burden. See custom Table 12.5 below for a summary.

RENTERS	% w/Cost Burden				
	Elderly family	Small family	Large family	Elderly nonfamily	Other hh type
No cost burden	55%	60%	48%	32%	40%
Cost burden >30% but <50%	21%	21%	21%	21%	25%
Cost burden >50%	23%	19%	31%	47%	36%
<b>Total Cost burden:</b>	44%	40%	52%	68%	60%

HOMEOWNERS	% w/Cost Burden				
	Elderly family	Small family	Large family	Elderly nonfamily	Other hh type
No cost burden	81%	83%	85%	62%	65%
Cost burden >30% but <50%	12%	10%	12%	24%	19%
Cost burden >50%	7%	7%	3%	14%	15%
<b>Total Cost burden:</b>	19%	17%	15%	38%	35%

Data 2014-2018 CHAS  
Source:

<sup>3</sup> ACS 5-year (2017-2021).

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

With so many people in the community cost burdened and severely cost burdened, there is no unique set of characteristics that are most at risk of homelessness. Housing costs are putting strain on households of all incomes, races, ethnicities, and family types. As discussed above, cost burden is especially concentrated among renter households earning less than 50% of the area median income. That said, local evidence suggests that families with young children, single adults, seniors, and those with chronic health conditions are especially vulnerable to homelessness.

Formerly homeless families who are nearing the end of their rapid rehousing program assistance have a range of needs. Service providers report that these primarily include permanently affordable rental units and/or rent subsidy; employment with wages that can meet of the cost of living in our area; childcare resources (including location, availability, hours, and affordability). Additionally, families may have needs around debt and credit repair, benefits counselling (if increasing income through employment), parenting supports, domestic violence supports, transportation, and goal setting for continued housing stability.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

Through a coordinated entry system, the jurisdiction uses an evidence-based assessment tool, Vulnerability Index Service Prioritization Decision Assistance Tool (VI SPDAT) adopted through The National Alliance to End Homelessness. Our housing system identifies households for appropriate housing placements using their VI SPDAT score. Households are identified for Permanent Supportive Housing, Rapid Rehousing or Diversion interventions based on the assessment tool.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

Targeted screening for prevention services is used by the Homeless Service Center. This considers factors related to instability and increased risk of homelessness, which are:

- Income (no income or extremely low income)
- Challenges to finding new housing were client to lose current housing (for example, criminal history related to housing barriers, poor credit)
- Previous episodes of homelessness
- Age of head of household (under 30 or over 65) and age of children (under 6)
- Disabilities, including physical and mental health concerns
- History of domestic violence

## NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

The four housing problems monitored by HUD are complete plumbing, complete kitchen, overcrowding, and cost burden. Cost burden is defined as paying more than 30% of household income for housing (rent or mortgage, plus utilities).

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,320	370	460
White	4,030	340	280
Black / African American	140	0	0
Asian	155	15	30
American Indian, Alaska Native	110	4	0
Pacific Islander	45	0	0
Hispanic	550	0	125

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data 2013-2017 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,050	950	0
White	3,245	805	0
Black / African American	25	25	0
Asian	145	20	0
American Indian, Alaska Native	100	50	0
Pacific Islander	40	0	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Hispanic	290	25	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2013-2017 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,325	2,645	0
White	2,680	2,230	0
Black / African American	0	40	0
Asian	110	110	0
American Indian, Alaska Native	55	74	0
Pacific Islander	0	0	0
Hispanic	270	180	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2013-2017 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,185	2,320	0
White	1,020	1,950	0
Black / African American	0	10	0
Asian	20	165	0
American Indian, Alaska Native	25	70	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	0	0	0
Hispanic	80	85	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data 2013-2017 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### Discussion

Housing problems are not evenly distributed among race or ethnic groups. For example, 42% of renters as a whole experience housing problems. Compare that with 79% of Pacific Islander and 66% of Native American households. This is a disproportionately high number with housing problems. Looking across income groups, the lowest income groups have the greatest percent of housing problems (most especially cost burdened). Eighty-five percent of households earning less than 30% of the area median income are cost burdened, and 83% of those earning between 30%-50% of the median. Only 10% of those earning above 100% of median income have housing problems, by comparison.<sup>4</sup>

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<sup>4</sup> More recent 2014-2018 CHAS data was used for this analysis.

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

Severe cost-burden is defined as paying more than 50% of household income for housing. The designation of “severe” housing problems means that there is severe cost burden, more than 1.5 persons per room (severe overcrowding) and includes lack of complete plumbing or kitchen facilities.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,760	935	460
White	3,545	825	280
Black / African American	140	0	0
Asian	155	15	30
American Indian, Alaska Native	105	8	0
Pacific Islander	45	0	0
Hispanic	475	70	125

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data 2013-2017 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,280	2,720	0
White	1,920	2,130	0
Black / African American	25	25	0
Asian	125	40	0
American Indian, Alaska Native	20	130	0

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Pacific Islander	25	15	0
Hispanic	145	170	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data 2013-2017 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 50%-80% of Area Median Income

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	960	5,015	0
White	760	4,150	0
Black / African American	0	40	0
Asian	10	205	0
American Indian, Alaska Native	0	129	0
Pacific Islander	0	0	0
Hispanic	105	345	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data 2013-2017 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 80%-100% of Area Median Income

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	540	2,970	0
White	475	2,495	0
Black / African American	0	10	0

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Asian	0	185	0
American Indian, Alaska Native	0	95	0
Pacific Islander	0	0	0
Hispanic	60	100	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data 2013-2017 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

## Discussion

As is the case with housing problems, severe housing problems are also more prevalent among specific income categories and racial or ethnic groups. Among households in the lowest income group (0-30% AMI), 77% of households in the jurisdiction as a whole have severe housing problems. However, 100% of African American and Pacific Islander households in this income category have severe housing problems. Native American households are also disproportionately represented, with 93% having severe housing problems.

In the 30-50% AMI income category, 46% of households in the jurisdiction as a whole have severe housing problems. Meanwhile, 76% of Asian households in this income category have severe housing problems. Pacific Islander households are also disproportionately represented, with 63% having severe housing problems.

In the 50-80% income group, just 16% of households in the jurisdiction have severe housing problems, and there is no disproportionate need. However, at the 80-100% AMI income level, 38% of Hispanic households have severe housing problems, while only 15% of households at this income level have severe problems in the jurisdiction as a whole.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction:

Of the housing problems, cost burden is by far the most significant in Bellingham. Cost burden in Bellingham is notably higher than both the region and the state. More recent 2021 ACS data shows that in Washington State 23% of homeowners and 46% of renters are cost burdened. Using the same data year, 24% of homeowners and 58% of renters in Bellingham are cost burdened. Renters in general have a disproportionately greater need than homeowners.

The high proportion of cost-burdened renters can be explained in part because Bellingham is a college town with a high population of young adults who are full-time students. Even so, an estimated 34% of all households are family households, and another 27% are elderly households (either family or non-family). Housing cost burden is just as problematic among the non-student population, and affects 42% of elderly nonfamily households, for example.<sup>5</sup>

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	20,470	6,510	7,850	460
White	17,865	5,300	6,250	280
Black / African American	125	0	175	0
Asian	950	175	270	30
American Indian, Alaska Native	245	175	110	0
Pacific Islander	0	15	70	0
Hispanic	1,025	445	595	125

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2013-2017 CHAS

Housing Cost Burden	Totals		NO Cost Burden <=30%	Cost Burden 30-50%	Severe Cost Burden >50%
<b>Jurisdiction as a whole</b>	<b>35,290</b>		<b>58%</b>	<b>18%</b>	<b>22%</b>
White	29,695	84.1%	60%	18%	21%
Black / African American	300	0.9%	42%	0%	58%
Asian	1,425	4.0%	67%	12%	19%
American Indian, Alaska Native	530	1.5%	46%	33%	21%
Pacific Islander	85	0.2%	0%	18%	82%

<sup>5</sup> 2014-2018 CHAS data. Table 7.

Hispanic	2,190	6.2%	47%	20%	27%
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**Custom Table 21 – Greater Need: Housing Cost Burdens by Race and Ethnicity**

**Discussion:**

Several racial and ethnic groups have disproportionately greater needs, according to the 2013-2017 CHAS data provided. See Custom Table 21, showing the percentage of each race and ethnic group by households who are cost burdened and severely cost burdened compared to the percentage of cost burden among the total population. This analysis shows that while 22% of the total population is cost burdened, 58% of Black households and 82% of Pacific Islander households are severely cost burdened. While this is a small percentage, it is more than double the proportionate rate. Hispanic households are also somewhat higher, with 27% of the population severely cost burdened compared to 22% of the total population. Similarly, 33% of Native American households are cost burdened, compared to 18% of the total population, which is disproportionately high.

## NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

**Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

Yes. There are many cases of this, among both renter and homeowner households. For example, among renters earning less than 30% of the Household Area Median Income (HAMI), 87% of all renter households have housing problems. In that same income category, 100% of Black, Native American, and Pacific Islander households have housing problems. Among homeowners earning between 30-50% HAMI, 100% of Hispanic households have housing problems compared to only 62% of the total population in that income category. See Custom Table 21.5 for the complete dataset. Those racial or ethnic groups with 10 percentage points or more above the total income category are considered “disproportionate” and are highlighted.

**Custom Table 21.5 – Disproportionately greater need by income category**

CITY OF BELLINGHAM -RENTERS	PERCENT WITH HOUSING PROBLEMS				
	<30% HAMI	>30% but <50%	>50% but <80% HAMI	>80% but <100% HAMI	>100% HAMI
White, not Hispanic	88%	93%	64%	39%	9%
Black, not Hispanic	100%	42%	0%	0%	19%
Asian, not Hispanic	71%	100%	79%	40%	20%
American Indian/ Alaskan Native, not Hispanic	100%	75%	41%	0%	0%
Pacific Islander, not Hispanic	100%	100%			
Hispanic, any race	82%	94%	72%	50%	8%
<b>All</b>	<b>87%</b>	<b>91%</b>	<b>64%</b>	<b>39%</b>	<b>10%</b>

CITY OF BELLINGHAM - OWNERS	PERCENT WITH HOUSING PROBLEMS				
	<30% HAMI	>30% but <50%	>50% but <80% HAMI	>80% but <100% HAMI	>100% HAMI
White, not Hispanic	74%	61%	44%	34%	9%
Black, not Hispanic			0%		0%
Asian, not Hispanic	100%	72%	50%	18%	16%
American Indian/ Alaskan Native, not Hispanic	100%	44%	0%	100%	60%
Pacific Islander, not Hispanic		0%			
Hispanic, any race	82%	100%	77%	100%	11%
<b>All</b>	<b>77%</b>	<b>62%</b>	<b>45%</b>	<b>36%</b>	<b>10%</b>

Data source: 2014-2018 CHAS

**If they have needs not identified above, what are those needs?**

As discussed above, the most significant problem is cost burden, and so the most common need is more affordable housing in a range of unit types and sizes.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

During Bellingham’s Assessment of Fair Housing, no areas were identified where there was significant concentration of a single ethnic or racial group with greater housing needs. This is in part because Bellingham remains predominantly White and non-Hispanic. However, families with children and youth are far more diverse than the city as a whole, and therefore some school district data was used in addition to Census data. This data set does suggest that there are some areas of above average concentrations of non-White households in neighborhoods on the north end of the city, in neighborhoods like Meridian, Cordata, and Birchwood.<sup>6</sup>

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<sup>6</sup> City of Bellingham 2022-2027 Assessment of Fair Housing, page 20. Available at: [2023-2027 Assessment of Fair Housing \(cob.org\)](https://www.cob.org/2023-2027-Assessment-of-Fair-Housing).

## NA-35 Public Housing – 91.205(b)

### Introduction

The Bellingham Housing Authority owns or manages 1,533 units within the City of Bellingham. Only a portion of the units owned or managed by the Housing Authority are considered "public housing" that receives financial assistance through HUD. The Housing Authority manages Housing Choice Voucher (Section 8) programs, and other voucher and special needs housing, and most managed units utilize these. It is important to note that the numbers below are for all of Whatcom County; we estimate that typically about 60% of vouchers are used in Bellingham, which is the largest City in the jurisdiction.

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *

Table 22 - Public Housing by Program Type

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: Bellingham/Whatcom County Housing Authority (December 2022)

### Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
									Average Annual Income

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average length of stay	0	0	7	5	4	6	4	0
Average Household size	0	0	2	2	2	2	1	0
# Homeless at admission	0	0	43	356	117	189	50	0
# of Elderly Program Participants (>62)	0	0	290	695	115	580	29	0
# of Disabled Families	0	0	381	1072	147	925	36	0
# of Families requesting accessibility features	0	0						0
# of HIV/AIDS program participants	0	0						0
# of DV victims	0	0						0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

Data Source: Bellingham/Whatcom County Housing Authority (December 2022)

**Race of Residents**

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	723	2,356	435	1,921	50	0	151
Black/African American	0	0	30	156	50	106	4	0	8
Asian	0	0	36	56	9	47	0	0	5
American Indian/Alaska Native	0	0	13	131	40	91	2	0	9

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Pacific Islander	0	0	13	38	6	32	1	0	1
Other	0	0	56	416	100	316	0	0	29

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 24 – Race of Public Housing Residents by Program Type**

Data Source: Bellingham/Whatcom County Housing Authority (December 2022)

**Ethnicity of Residents**

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	141	520	103	417	4	0	30
Not Hispanic	0	0	730	2,633	537	2,096	53	0	173

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

Data Source: Bellingham/Whatcom County Housing Authority (December 2022)

### **Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

The Public Housing waiting-lists in the City of Bellingham reflect, 122 out of 643 (19%) households reporting a mobility, hearing, or sight disability. The tenant-based Housing Choice Voucher waiting-list reflect, 100 out of 326 (30%) households reporting having a mobility, sight, or hearing disability. The project-based Housing Choice Voucher waiting-lists reflect, 84 out of 368 (23%) households reporting a mobility, sight, or hearing disability. Among all three lists, mobility disability is the most common. There is undoubtedly duplication of individual households among these lists.

### **Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

The most immediate need of Public Housing residents is more individualized support to help ensure housing is retained. In a listening session with Public Housing residents, several expressed that they would like to have more on-site liaisons or advocates available to help them troubleshoot problems and provide referrals to resources. Since the pandemic, there has been a lack of resources available to help residents maintain their homes in a manner consistent with HUD required inspection standards. Programs once available to assist in this area are much harder to come by, putting pressure on the Authority and case managers, that already have limited capacity to assist. In addition, Whatcom County is experiencing significant challenges with substance abuse, behavioral health, homelessness, and police reforms. More than ever, Authority staff are called upon to respond and provide interventions in areas they are not trained. Federal programs operate with very little margin, making it difficult to add staffing resources, trainings, or certifications.

HUD is not expanding the Public Housing program, however the need for these units is much higher than the supply, leading to closed waitlists and long wait times for available units.

The most immediate need of voucher holders are additional subsidized units, as well as individualized support to help obtain housing. There is a severe shortage of subsidized units in our community, and voucher holders often struggle to find an affordable apartment. Even though source of income discrimination is now prohibited in Washington State, survey results reveal that this is still taking place and voucher holders struggle to find a property owner who is willing to accept their voucher.

### **How do these needs compare to the housing needs of the population at large?**

These needs do not differ greatly from the population at large. Many referral programs and resident support that were available pre-pandemic, are no longer available, have limited capacity or have shifted their focus post-pandemic. Safety and affordability are concerns for most community members. Many residents in our community are cost burdened. There is a general need for more permanently affordable and below-market housing units, and for those with barriers such as poor rental history or low credit scores, individualized supports to obtain and retain stable housing are also needed. Even low-income residents who already live in subsidized or income restricted units still report that they struggle to afford rent payments.

## NA-40 Homeless Needs Assessment – 91.205(c)

### Introduction:

As a jurisdiction, there are three main sources of data on the homeless population: The 2022 Point-in-Time Count, the Whatcom Homeless Service Center and the Homeless Outreach Team (all administered by the Opportunity Council). This data is county-wide, so the information below includes all of Whatcom County. Therefore, the numbers given below will be slightly greater than what would be likely for Bellingham alone. That said, Bellingham is by far the largest City in Whatcom County, and most of the services and facilities for people experiencing homelessness are located here.

In addition, the city’s largest emergency shelter is Base Camp, operated by the Lighthouse Mission Ministries, which serves on average about 1,200 unique individuals per year. The shelter can accommodate 200 overnight guests per night, and most of these guests (estimated about 60%) do not consent to having their data entered into HMIS, and therefore are not counted in the estimated number experiencing or becoming homeless each year.

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	242	14	1150	824	267	191
Persons in Households with Only Children	1	2	N/A	N/A	N/A	N/A
Persons in Households with Only Adults	407	166	1088	759	149	255
Chronically Homeless Individuals	48*	85*	506	307	70	327
Chronically Homeless Families	34*	9*	174	48	40	274
Veterans (HOH is a veteran)	36	10	81	63	20	250
Senior (HOH is 65+)	54	3	90	75	13	206
Disabled (HOH is disabled)	184	122	986	698	211	251
Unaccompanied Child	2	2	1150	824	267	191
Persons with HIV			N/A	N/A	N/A	N/A

\*Due to COVID we asked fewer questions in the PIT count 2022, there is a lot of missing data on the chronic questions for PIT so this is likely an undercount for

chronically homeless individuals and families

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

N/A

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>

Data Source  
Comments:

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

The Whatcom Homeless Service Center (WHSC) reported that they continue to see unprecedented numbers of families with children entering the Housing Pool. From January to December 2022, 30% of households on the Housing Pool were families with children (315 out of a total of 1,022 households). The WHSC reported that of the 702 households active in the Housing Pool in Q4 of 2022, there were 178 were families with children who are awaiting a placement.

There has been a decrease of the number of Veterans seeking assistance through the Housing Pool, but with an uptick in the last year. In 2018 there were 116 applicant households that were Veterans, and that number fell steadily each year, to a low of only 40 applications in 2021. In 2022, there were 76 applicant households who were headed by a Veteran.

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

The Whatcom County Point-in-Time Count includes the following analysis of homelessness compared to race and ethnicity in Whatcom County, “Race and ethnicity continue to be correlated with homelessness. The 2022 Point in Time count surveys show that only 60% of the respondents experiencing homelessness told surveyors that they identify both as white and non-Hispanic. This contrasts with the county’s demographics where the white, non-Hispanic population makes up more than 82% of Whatcom County’s population. The data is incomplete (16% did not answer this question) and surveys were not conducted by outreach workers across all of Whatcom County, but this information suggests that work is needed to offset current systems that result in a greater portion of people of color experiencing homelessness than their white neighbors. Although people of color in Whatcom County experience poverty at higher rates than their white neighbors, this does not fully explain the disparities in homelessness. For example, census data shows that the American Indian and Alaska Native population accounts for about 5% of Whatcom resident in poverty, but they account for 7% of people experiencing homeless, as counted in this report.”<sup>7</sup>

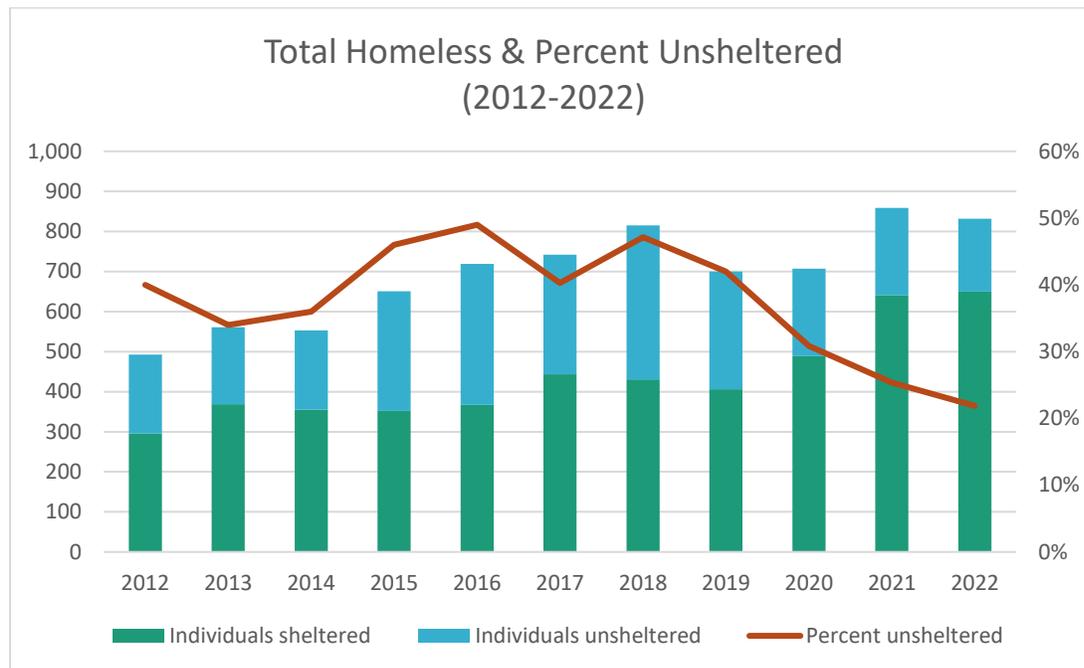
**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

The number of people who are homeless over the course of any given year is much larger than those who are experiencing homelessness on a single night. Still, our annual Point-in-Time count shows the nature and extent of sheltered and unsheltered homelessness over time. Looking at data over the past

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<sup>7</sup> *A Home for Everyone: Whatcom County Coalition to End Homelessness 2021 Annual Report*, July 2021. Available at: [www.whatcomcounty.us/DocumentCenter/View/57826/PIT2021](http://www.whatcomcounty.us/DocumentCenter/View/57826/PIT2021).

decade, we see that the total number of people experiencing homelessness on a given night is climbing. At the same time, we can see that investments in services and shelters are working, because although the need is even greater than it was during the previous Consolidated Plan, the percent of those who are unsheltered continues to decline. In 2022 there were 832 homeless individuals on a single night, and 22% of those individuals were unsheltered – living outdoors, in tents or cars. In 2018, there were 815 homeless individuals on a given night, and 47% were sheltered. This 25-percentage point increase in sheltered individuals in five years is a notable accomplishment for our community.



**Discussion:**

One important and troubling trend that has emerged since the prior Consolidated Plan has been the increasing number of families with children who are experiencing homelessness, and the duration of their homelessness. A group of stakeholders was convened by the City, with funding from a local foundation, to gather data, investigate possible solutions, and propose a strategy appropriately address the needs of this population. A report from November 2021 summarizes this trend:<sup>8</sup>

“In late 2019, Whatcom County had nearly reached its goal of getting to “functional zero” in the number of families with children experiencing homelessness. Meaning when families with children did experience homelessness, it was brief (soon able to re-enter stable housing) and non-recurring (the family did not become homeless again soon thereafter). However, the number of families with children experiencing homelessness in Whatcom County surged soon after the start of the COVID-19 pandemic, doubling from 49 in February 2020 to 113 in February 2021.<sup>9</sup> The rising numbers of this demographic were part of an overall increase in homelessness in Whatcom County yielding a year-over-year increase

<sup>8</sup> Interim Housing Facility for Families with Children Feasibility Analysis. Phase 1: Research and Stakeholder Input Report. Authors: Ginger Segel and Sarah Lindsley. November 17, 2021.

<sup>9</sup> Whatcom Housing Service Center: Monthly Housing Pool Reports, published by Opportunity Council, February 2020 and February 2021.

of 22% from 2020 to 2021. Yet the rate of homelessness for families with children outpaced that of other groups of homeless people, with an increase of 50% in the same year-over-year growth period.<sup>10</sup>

Since the time of this report, the number of homeless households with children, and those participating in motel stay programs has continued to increase. The City of Bellingham and partners in Whatcom County continue to prioritize this vulnerable population, hoping to break the cycle of homelessness. A new permanently affordable rental housing project by Mercy Housing Northwest has recently opened in the Bellingham, with many homeless families able to move into these newly available units. However, the root causes of family homelessness, and homelessness in general, remain. The City of Bellingham anticipates that as COVID-19 specific funding sources and rental assistance programs come to an end, the trends we have seen in recent years will continue to worsen.

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<sup>10</sup> *A Home for Everyone: Whatcom County Coalition to End Homelessness 2021 Annual Report*, July 2021. Available at: [www.whatcomcounty.us/DocumentCenter/View/57826/PIT2021](http://www.whatcomcounty.us/DocumentCenter/View/57826/PIT2021).

## NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

### Introduction:

Through data analysis and community and stakeholder feedback, the city has prioritized the following special needs groups who are especially vulnerable to housing insecurity and homelessness.

- Elderly persons
- Low-income families with children
- Persons with a disability
- Persons who are medically fragile or have with chronic health conditions
- Survivors of domestic violence
- Veterans

Because these same populations also are also overrepresented in our population experiencing homelessness, it is critical that adequate services and housing is available to prevent future homelessness.

### Describe the characteristics of special needs populations in your community:

#### Elderly persons:

There are estimated to be 14,206 residents aged 65 and above in Bellingham (16% of the population). Of these older residents, 30% have a disability. The proportion of the population aged 75+ years with disabilities jumps to 41%. The need for housing and services for the elderly population continues to increase as these demographics age and grow, as we have seen since our previous Consolidated Plan. The elderly population is also especially likely to be cost burdened if they rent. For example, 23% of elderly family households and 47% of elderly non-family households who rent are *severely* cost burdened, paying over 50% of their incomes for rent.<sup>11</sup>

#### Low-income families with children:

Low-income families with children in Bellingham are struggling with rising housing costs, childcare costs, and inflation which is increasing the cost of basic needs such as food, school supplies, transportation, and hygiene products. Seventeen percent (17%) of families with children in Bellingham are below the poverty level, but 70% of all single female households with children are below the poverty level. Single parent families are especially vulnerable and must rely on childcare subsidies and other programs<sup>12</sup> to stay afloat.

#### Persons with a disability:

Twelve percent of the population of Bellingham has a disability of any type.<sup>13</sup> Among people under age 65, 9% have a disability – although not all are necessarily in need of assistance. Five percent of Bellingham residents have independent living difficulty, and 2% have self-care difficulty (a total of 8,192 residents). However, disability is much more common among low-income residents. For example,

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<sup>11</sup> 2014-2018 CHAS data. Table 7.

<sup>12</sup> 2021 1-year ACS. Table C17010.

<sup>13</sup> 2017-2021 5-year ACS. Table S1810.

among renter households earning less than 30% of the area median income, 36% have an ambulatory limitation and 30% have a self-care or independent living limitation.<sup>14</sup>

The types of disability most common among the non-elderly adult population in Bellingham is cognitive difficulty. Mental health disability is possibly the biggest non-homeless special needs group in the jurisdiction, and significantly impacts the homeless population.

Persons who are medically fragile:

While data sources available for other groups do not include persons who are suffering from chronic health conditions or are medically fragile, community feedback from practitioners tells us that there is a serious need for more skilled care facilities, adult family homes, and other housing with support services for low-income adults who are not able to work and cannot care for themselves.

Survivors of domestic violence:

Individuals and families who have survived domestic violence are especially vulnerable to further trauma due to the disruption that domestic violence causes on employment, housing, education, and the effects on mental health. Whether or not a survivor becomes homeless, they often must abruptly change jobs, schools, or where they live and seek support from trained mental health counselors.

Veterans:

Veterans make up 5.6% of the population in Bellingham and 7.3% of the population in Whatcom County.<sup>15</sup> Despite the fact that our community continues to benefit from many Veteran-specific resources available, such as the Supportive Services for Veteran Families, we see veterans are disproportionately represented in those seeking services from the Whatcom Homeless Service Center. For example, 19% of all heads-of-household enrolled in the Housing Pool in Q4 2022 were veterans.

**What are the housing and supportive service needs of these populations and how are these needs determined?**

Many of the needs of the disabled, elderly, and medically fragile population are overlapping. All these groups need more affordable, supportive living environments that meet their unique needs. For example, community feedback from families of developmentally disabled adults and seniors both expressed a desire for more shared housing options where adults could share expenses, chores, and common areas, but still have autonomy and privacy. Bellingham's housing stock is very constrained and has historically catered to nuclear families, students, and young professionals. Many groups have expressed strong desire for more diverse housing types which can be flexible and provide stability and support for those with cognitive or mobility limitations, but who do not need a skilled nursing facility.

Survivors of domestic violence, especially adults who are parenting, need more trauma-informed options where they can have privacy and services to help them heal. Motels are used as emergency shelter for families with children, including those who have multiple challenges, such as a history of domestic violence and substance abuse. Clients and their case managers report that motels are not the proper environment for children or for those who are needing to recover from addiction and trauma. The community currently has no such facility for emergency shelter, and very few units of permanent

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<sup>14</sup> 2014-2018 CHAS data. Table 6.

<sup>15</sup> 2017-2021 ACS data. Table S2101.

supportive housing or transitional housing for those with complex mental health or behavioral health needs.

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

Data for the Eligible Metropolitan Statistical Area is not available. There are 253 reported cases of HIV positive individuals living in Whatcom County. This is an increase from the previous Consolidated Plan, and represents 2% of the known cases in Washington State. These households are provided subsidized units through a HOPWA allocation. Sean Humphrey House is the only housing organization specializing in providing care for adults living with HIV/AIDS. Their residence is currently full with 6 permanent residents.

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction’s need for Public Facilities:**

The City of Bellingham aims to remain responsive to the needs of local agencies as new priorities arise. In the past, we have responded by supporting community groups who identified a need for facilities in neighborhood, and the city will continue to do so in the future – especially prioritizing areas that lack services and opportunities for residents.

While not all these needs are under the purview of City programs or funding resources, the non-housing public facilities that members of the community have advocated for are:

- An immigrant resource center
- More drug and alcohol rehabilitation centers
- A day-use centers for the unsheltered population, including restrooms and showers
- Designated climate emergency centers (with air conditioning, heat, air purification) for vulnerable groups
- More childcare centers

### **How were these needs determined?**

Community organizations that are led by or work directly with low-income residents are the best source of information on community development needs. The City annually releases a Notice of Funding Availability for Community/Public Facilities and Improvements. Nonprofit organizations or community groups are welcome submit ideas or applications for funding, which is granted on a competitive basis.

During the Public Participation Process, the City’s Engage Bellingham website also asked residents to submit ideas and suggestions on Public Facilities & Services, as well as through multiple targeted on-line surveys and in-person engagement events.

### **Describe the jurisdiction’s need for Public Improvements:**

More information is forthcoming and will be incorporated in the final Plan.

### **How were these needs determined?**

The City’s Public Works Department is the main agency that manages and responds to the jurisdiction’s needs for public improvements. Public Works uses the following plans to guide decisions for public improvements related to transportation and utilities:

- Water System Plan- long-term plan that includes maintenance and future improvements for our water system; includes water rates
- Stormwater Comprehensive Plan- same as above but for the stormwater system
- Comprehensive Sewer Plan- same as above for the sewer/wastewater treatment system
- Bike/Ped master plans - updates in development
- Urban Forestry Management Plan - in development

### **Describe the jurisdiction's need for Public Services:**

Many of the services provided by are community partners continue to be in high demand. These include:

- Domestic violence support services
- Mental health counseling
- Food security programs, such as food banks and meal delivery for elderly/medically fragile residents
- Literacy and job training
- Landlord/tenant mediation and dispute resolution services
- Subsidized childcare
- Social supports for developmentally disabled adults
- Family Resource Centers located on-site at schools

### **How were these needs determined?**

The city releases a Notice of Funding Availability for Human Services every two years. Nonprofit organizations or community groups can submit applications for funding, which is granted on a competitive basis. Any non-profit that provides services within the City of Bellingham is welcome to apply.

During the Public Participation Process, the City's Engage Bellingham website asked residents to submit ideas and suggestions on Public Facilities & Services, as well as through multiple targeted on-line surveys and in-person engagement events. Staff have also conducted multiple workshops and interviews with case managers and other direct service providers.

# Housing Market Analysis

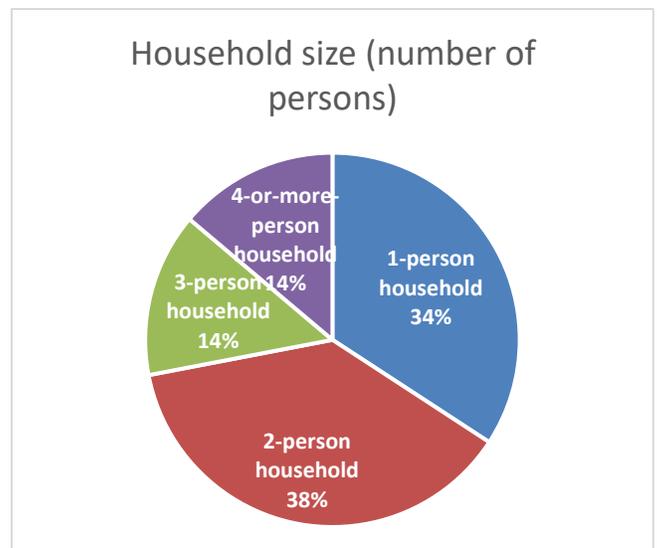
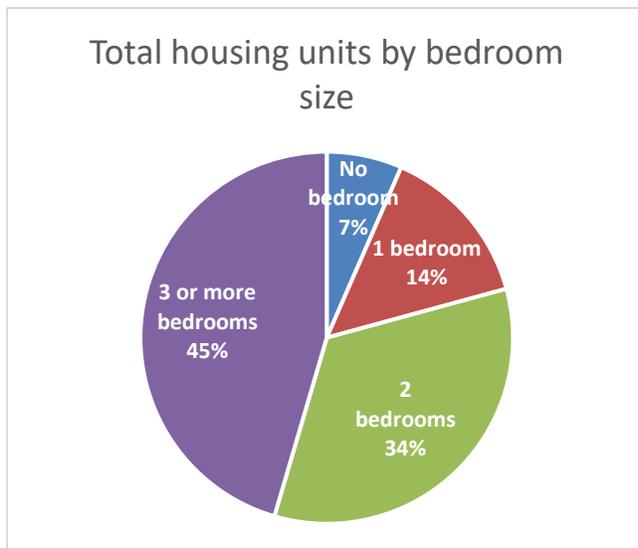
## MA-05 Overview

### Housing Market Analysis Overview:

Population growth in Bellingham has remained steady over the past few decades, but it has not exceeded the statewide average. Washington State as a whole is increasing in population, and Bellingham has absorbed its proportionate share. From 2010 to 2022, the population of Washington grew by 17% and the population of Bellingham grew by 16.1%.

Fifty-four percent (54%) of households in Bellingham are non-family households; data sources classify these as “other household types,” but they include individuals living alone or with roommates. Only 3% of households in the city are large family. Compare this to Bellingham’s housing stock, where most of the single-family housing stock is 3 or more bedrooms. Not only is there an overall lack of housing, but there is also a serious mismatch between the kinds of households in Bellingham and the housing stock being offered.

The two pie charts below illustrate a disconnect between the housing units that exist in Bellingham and the households that live here. Forty-five percent of our housing units have three or more bedrooms, while only 28% of our households or families have 3 or more people. The market is providing larger houses than people need or can afford in today’s market.



Although the private housing market provides adequate housing choices for those earning 100% of area median income (AMI) and above, it cannot meet the needs of low-income households earning less than 50% of the AMI, or even 80% for larger households. This is a factor of the high cost of construction, and the limited availability of units that can be built with public funds.

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

Although multifamily housing is being added to the overall housing stock at a faster rate than single-family detached units, the largest proportion of housing units (45%) are still single unit detached homes. Altogether, multifamily units of all sizes make up 48% of housing units. Mobile homes, boats, RVs, and attached one-unit structures such as mother-in-law units or ADUs make up the remaining units.

Smaller units (0 and 1-bedroom) are more likely to be renter occupied, whereas larger units (3 or more bedrooms) are more likely to be owner-occupied. Two-bedroom units are 38% renter-occupied and 27% owner-occupied. Although most new units added are multi-family, the overall distribution of housing units and tenure has changed only slightly since the previous Consolidated Plan period.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	18,791	45.2%
1-unit, attached structure	1,580	3.8%
2-4 units	5,072	12.2%
5-19 units	6,569	15.8%
20 or more units	8,564	20.6%
Mobile Home, boat, RV, van, etc.	915	2.2%
<b>Total</b>	<b>41,573</b>	<b>100%</b>

Table 26 – Residential Properties by Unit Number

Data Source: 2017-2021 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	115	1%	2,200	11%
1 bedroom	475	3%	4,540	24%
2 bedrooms	4,520	28%	7,405	38%
3 or more bedrooms	10,895	68%	5,155	27%
<b>Total</b>	<b>16,005</b>	<b>100%</b>	<b>19,300</b>	<b>100%</b>

Table 27 – Unit Size by Tenure

Data Source: 2013-2017 ACS

### Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Below is a summary of the total number of units by type of housing program, as of January 2023. The population designated as “low income” varies by income level depending on the specific program. For example, most permanent low-income housing units are restricted to residents making 60% AMI and below, but for the City-run Home Rehab Program, homeowners who are seniors or disabled can have an income of up to 80% of the AMI. Depending on the type of housing program a housing unit could be a

house, an apartment, a motel room, or a bed/cot. Therefore, the total units below should be considered roughly equivalent to the number of households that can be served, not the number of individuals.

Type of housing program	Estimate as of Jan 2023
Emergency shelter (year-round)	372
Emergency shelter (winter only)	93
Home ownership or repair	1,188
Public or non-profit housing (permanent)	2,742
Supported housing (permanent)	181
Transitional	189
Vouchers*	1,985
<b>Grand Total</b>	<b>6,750</b>

\*Note that there is significant overlap between vouchers and public housing units, since some low-income recipients may use their vouchers in the public housing as opposed to on the private market. Vouchers administered by BHA can be used anywhere within Whatcom County, so a percentage should be assumed to be housing outside of the jurisdiction.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

Several properties in Bellingham have all or some of their units set aside as affordable units as part of state or federal tax credit programs. These programs have an expiration date, meaning that some units may be at risk for substantial rent increases once rent restrictions from the tax credit programs lapse. In Bellingham there are currently 29 tax credit properties with a total of 2,224 rent-restricted units. Out of 29 properties, all but 4 are owned and operated by non-profit housing groups such as the Bellingham Housing Authority, Catholic Community Services, or Mercy Housing Northwest. Mission-driven affordable housing enterprises may be expected to seek to retain all or most of these units in affordable status, either as a business choice or after receiving grants or other assistance to pay for necessary expenditures such as maintenance. However, although there are only 4 for-profit tax credit properties, together they comprise nearly one third (28%) of all tax credit units.

The City of Bellingham is committed to working proactively with partners and other funding agencies to ensure that rent-restricted units do not become market rate, which would price low-income residents out of their homes. In 2022, the City of Bellingham helped Mercy Housing Northwest to acquire Evergreen Ridge Apartments, which had a tax credit that was due to expire in 2025. Together, our community was able to work proactively to ensure that the 145-unit building would not be sold on the private market, and instead would be retained as permanently affordable housing.

**Does the availability of housing units meet the needs of the population?**

No. As indicated by the increasing homelessness, housing instability, and cost burden in our community, the availability of housing does not meet the needs of the population.

- There are at maximum 4,727 permanently affordable housing units/rental vouchers in Bellingham (and far less if accounting for overlap and vouchers used outside of the city). This is compared to the approximately 12,000 households that earn below 50% of the AMI.
- Altogether there are an estimated 14,505 households in Bellingham are cost burdened, and 7,615 of these households are severely cost burdened.<sup>16</sup>
- Seniors on fixed incomes, even those who live in an income-restricted unit, are highly cost burdened; 63% of all seniors who rent are cost burdened.
- Families with children struggle to find housing that they can afford, and which also meets their needs. Over half of families who rent are cost burdened, and 12% of all families with children live below the poverty level.
- Affordable student housing is lacking, meaning that students from moderate-income families are forced to take on an increased amount of debt to fund their education.
- There are limited options for low- and moderate-income families to purchase a home that is affordable to them, reducing the number of young people who can begin to build equity and secure housing that will remain affordable.

### **Describe the need for specific types of housing:**

While there is a general housing shortage, the most acute needs are for the following types of housing:

- Permanent supportive housing for disabled adults
- Permanently affordable rental units for people earning less than 30% AMI
- Smaller units that are available for purchase for low- and moderate-income households

### **Discussion**

It is important to note that most of the tax credit units in the city are “rent restricted”, but they still may be unaffordable to very low-income residents when there is no direct subsidy tied to the tenant. For example, a resident must earn below 50% or 60% of the area median income (AMI) to qualify for a rent restricted apartment in a tax credit property. But if that resident earns only 30% of AMI, then they would still be cost burdened, despite having below-market rent. Public feedback tells us that this is becoming increasingly common.

In addition to the need for more emergency and specialty shelters, there is a need for permanent housing especially for vulnerable groups. Of the 707 homeless households on our Housing Pool in February 2022, almost half were deemed to be in need of permanent supportive housing. These are individuals who cannot live without support due to mental health, developmental disability, or substance use disorder. We have a shortage of both available units in permanent supportive housing, and also a shortage of qualified operators who are able to expand their capacity.

In addition to those who need supportive housing, there are many whose very low incomes keep them extremely vulnerable to housing instability and homelessness. This is especially true for our seniors and disabled residents on fixed incomes. Even in some of our already permanently affordable housing units, some residents are cost burdened because they earn even less than the income bracket for which their unit is targeted.

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<sup>16</sup> 2015-2019 CHAS data.

# MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

## Introduction

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2022	% Change
Median Home Value	300,900	622,000	107%
Median Contract Rent	699	1,693	142%

**Table 28 – Cost of Housing**

**Data Source:** 2000 Census (Base Year), Local sales data from Whatcom County Assessor (2022) and City of Bellingham annual market rent study (2022)

Rent Paid	Number	%
Less than \$500	1,900	9.9%
\$500-999	10,695	55.4%
\$1,000-1,499	4,530	23.5%
\$1,500-1,999	1,535	8.0%
\$2,000 or more	650	3.4%
<b>Total</b>	<b>19,310</b>	<b>100.1%</b>

**Table 29 - Rent Paid**

**Data Source:** 2013-2017 ACS

### Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	735	No Data
50% HAMFI	2,735	545
80% HAMFI	10,920	1,325
100% HAMFI	No Data	2,460
<b>Total</b>	<b>14,390</b>	<b>4,330</b>

**Table 30 – Housing Affordability**

**Data Source:** 2013-2017 CHAS

### Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	747	811	1,058	1,530	1,858
High HOME Rent	747	811	1,058	1,303	1,434
Low HOME Rent	692	741	890	1,028	1,147

**Table 31 – Monthly Rent**

**Data Source:** HUD FMR and HOME Rents (2022)

## Is there sufficient housing for households at all income levels?

No. The table below compares the market rent to a presumed household size according to the number of bedrooms. A single-person household earning 100% of the median income can just afford a market-rate studio unit at the median cost of \$1,588 per month. (Due to the number of new, luxury studios coming on the market, the median cost of a studio apartment was slightly higher than a 1-bedroom in 2022.) A 4-person household earning the median family income of \$97,300 per year could not afford a median-priced market-rate rental 3-bedroom unit without being cost burdened. No median-priced rental would be affordable to any household earning 80% of the median income.

The outcome of this is evident in our high percentage of renter households that are cost burdened.

	Studio	1-bed	2-bed	3-bed
Presumed HH Size	1	2	3	4
2022 Median Market Rent	\$ 1,536	\$ 1,443	\$ 1,850	\$ 2,445
Market Rent + Utilities	\$ 1,588	\$ 1,501	\$ 1,924	\$ 2,572
60% MFI	\$ 952	\$ 1,020	\$ 1,225	\$ 1,415
80% MFI	\$ 1,270	\$ 1,452	\$ 1,634	\$ 1,814
100% MFI	\$ 1,588	\$ 1,815	\$ 2,043	\$ 2,268
120% MFI	\$ 1,905	\$ 2,178	\$ 2,451	\$ 2,721
<i>*Affordability is based on WSHFC 2022 Rent Limits for Whatcom County by household size</i>				

The availability of housing for potential homeowners is even more dire. Homes sales data from 2021 obtained from the Whatcom County Assessor's office shows a median value of \$622,000 for all home sales, which includes 748 single-family homes and 244 condos. Single family homes had a median sales value of \$680,000 and condos had a median sales value of \$375,000. A 4-person household earning the median income of \$97,300 in 2022 could afford a purchase price of \$418,000, which is over \$200,000 below the median sales price.

## How is affordability of housing likely to change considering changes to home values and/or rents?

If current trends continue, the cost of housing will continue to rise and become even less affordable to Bellingham residents at lower incomes. Although more market-rate and subsidized housing is continually being built in the city, construction still lags demand. With current construction costs above \$400,000 *per unit* for a small apartment in a large multifamily building (the most cost-effective way to build housing), new units must be heavily subsidized to be affordable to residents that earn less than 100% of the AMI. Unless home values or construction costs fall steeply, or there are substantial increases to funding for subsidized housing, we do not predict there to be a significant increase in the percent of housing that is affordable to residents earning less than the median income.

## How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

HUD's "Fair Market Rent" is significantly lower than actual area median rent. Each summer, staff conduct a market study of all rental properties with 3 bedrooms or less that are advertised for rent on public platforms. Comparing these to HUD's Fair Market Rent, we see a difference of 137% - 166%, with

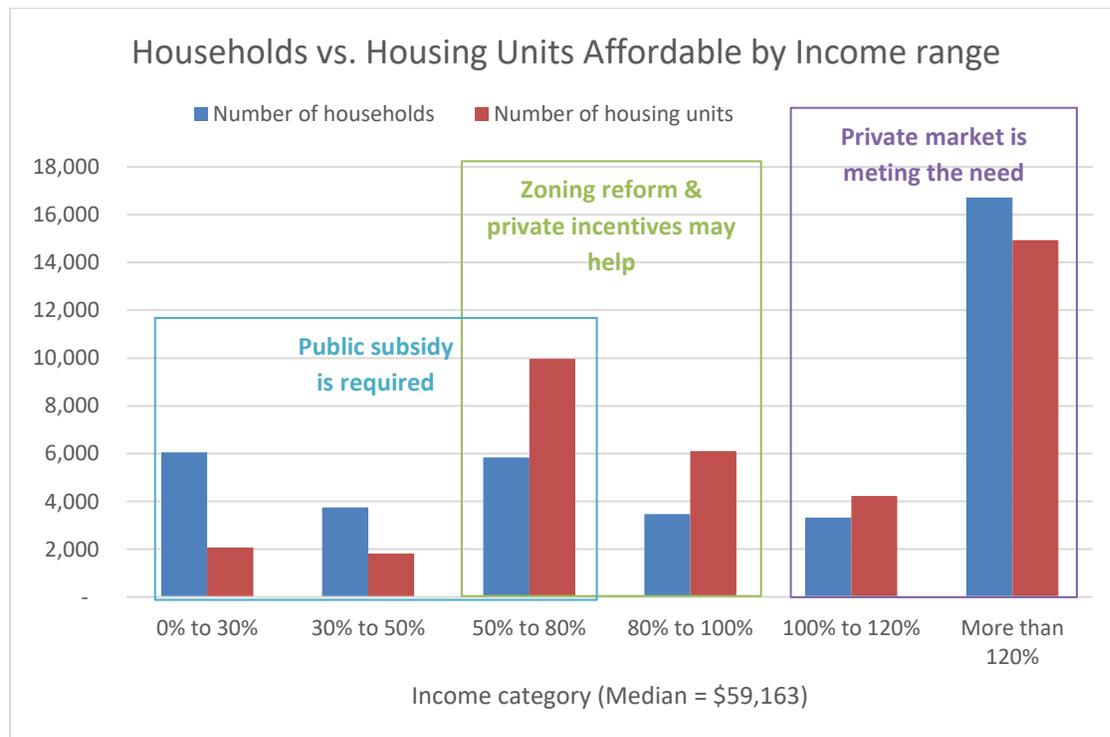
the biggest gap for smaller sized units. The table below shows how Bellingham’s area median rent compares to the HUD Fair Market Rent in 2022. This significant difference impacts the city’s strategy in that we must designate a higher allowance for rapid rehousing and other rental subsidy programs locally, and to invest local dollars in rental assistance where federal programs do not pay the market rate.

<b>City of Bellingham Adjusted Payment Standard</b>	\$1,351	\$1,431	\$1,762	\$2,504
<b>HUD FY 2022 Fair Market Rent</b>	\$ 926	\$ 996	\$1,254	\$1,781
<b>\$ difference</b>	-\$610	-\$447	-\$596	-\$664
<b>% difference</b>	166%	145%	148%	137%

### Discussion

Our local and regional housing market is not able to meet the demand for housing at a price that moderate or low-income residents can afford. The result is a high rate of cost burden, which has several implications for our society. Heavy reliance on other social services, like childcare subsidies and food programs is a symptom of the high rate of cost burden. Homelessness is another.

The figure below compares the number of households at each income level to the estimated number of units that are affordable to that same income level. There are many more units affordable per household for those earning from 50-100% of the Area Median Income (AMI) because most of the households earning less than 50% AMI are cost burdened, meaning they are paying too much of their income for housing.



## MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

### Introduction

### Definitions

Standard condition – the unit is compliant with all state and local building and safety codes.

Substandard condition but suitable for rehabilitation – the unit is not in compliance with local or state building and safety codes, has incomplete plumbing or kitchen facilities, or has failed the third rental registration inspection – but is otherwise both financially and structurally suitable for rehabilitation.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	3,910	24%	10,450	54%
With two selected Conditions	85	1%	680	4%
With three selected Conditions	0	0%	60	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	12,005	75%	8,110	42%
<b>Total</b>	<b>16,000</b>	<b>100%</b>	<b>19,300</b>	<b>100%</b>

Table 32 - Condition of Units

Data Source: 2013-2017 ACS

### Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,630	16%	4,030	21%
1980-1999	4,075	25%	6,570	34%
1950-1979	4,720	30%	5,030	26%
Before 1950	4,575	29%	3,670	19%
<b>Total</b>	<b>16,000</b>	<b>100%</b>	<b>19,300</b>	<b>100%</b>

Table 33 – Year Unit Built

Data Source: 2013-2017 CHAS

### Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	9,295	58%	8,700	45%
Housing Units build before 1980 with children present	1,520	10%	580	3%

Table 34 – Risk of Lead-Based Paint

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)

## Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			2,077
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

**Table 35 - Vacant Units**

Note: data from ACS Table B25004. Awaiting more accurate data from the USPS in Q1 2023.

## Need for Owner and Rental Rehabilitation

The Whatcom County Assessor’s assigns a valuation of housing quality using a rating scale from “Excellent +” to “Low”. As of February 2023, 393 single-family units (or about 2% of single-family housing stock) has a designation of “Fair” or lower. Only 40 out of the 19,347 current single-family units in Bellingham have a designation of “Low” or “Poor” quality condition (2021 assessor evaluation).

Alternatively, using 5-year 2021 ACS data, there are 64 occupied units which lack complete plumbing facilities and 731 units lacking a complete kitchen, for a total of 795 “substandard” units out of 39,496 total occupied housing units. This also implies that about 2% of all housing units are substandard.

For rental housing, the City of Bellingham administers a Rental Registration and Safety Inspection program. Property owners are required to register their rental properties with the city and undergo a health and safety inspection approximately every three years to review items found on the [Inspection Checklist \(cob.org\)](#). When the city first began the program in 2015, there were approximately 18,000 rental units registered. Of those units that were inspected in the first round, 54% passed the first inspection without any issues,<sup>17</sup> and 22% passed with conditions. The remaining 22% failed the first inspection, but of those only three failed the final re-inspection. The second round of inspections began just prior to the COVID-19 pandemic, postponing the inspection portion of the program for approximately 2 years. In April 2022, the city resumed the Safety Inspection Program. To date, almost three neighborhoods have completed their second round of inspections, **the results of which will be available before the final draft of the Consolidated Plan is published**. At this time, City Council is reviewing all components of the Rental Registration & Safety Inspection program and will be considering the best ways to ensure the 19,573 registered units,<sup>18</sup> as well as though yet to register, are safe places for tenants to live.

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<sup>17</sup> This number includes units inspected by a private inspector. For those units that have a private inspection preference, the city receives a Declaration of Inspection from the inspector once the unit passes, we are not informed if that occurs the first time, or after multiple visits.

<sup>18</sup> This number includes units that qualify for an exemption from the safety inspection program based on criteria listed in [BMC 6.15.050](#).

## **Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

Lead based paint is more common in households built before 1980, and more of a health hazard when young children present. The 2013-2017 ACS data indicate that 58% of owner-occupied households and 45% of renter-occupied households were built before 1980. Of those, there are 1,520 owner households and 580 are renter-occupied households with children under 6 years of age.

Low- and moderate-income households may have less ability to remove or suppress lead paint, which can be quite expensive. Subtracting out households earning over 80% AMI, the risk of lead-based paint hazard is most likely to be highest in 625 owner-occupied households and 359 renter-occupied households that are moderate or low income, for a total of 984 households.<sup>19</sup>

### **Discussion**

Rapidly increasing property values and high demand for housing means that Bellingham has relatively few blighted or abandoned properties – so few that there is no database for tracking such properties. Using available data, the rough estimates above have been used to approximate the need for residential property rehabilitation based on the age and value of the home, and lead paint danger by the number older households with young children present. However, these are only estimates.

The city has an ongoing program to help low-income homeowners make health and safety repairs, including stabilization of lead paint. Since 2001, 273 homes in Bellingham have been rehabilitated through the Home Rehabilitation Loan Program. Low-income homeowners who qualify can receive zero-interest loans for necessary repairs which keep owner-occupied properties from becoming blighted or condemned.

The Rental Registration and Safety Inspection program, initiated in 2015, is intended to ensure that all rental properties are meeting local health and safety codes, and that property owners are making necessary ongoing repairs. The Covid-19 pandemic put health and safety repairs on hold for several years, though, and public comments have recently surfaced which call into question the effectiveness of this program in addressing the issue of substandard rental housing. The intense shortage of affordable housing also means that residents may fear rental cost increases if they report violations or request repairs, making enforcement difficult.

City staff are committed to working with renters and property owners to address these concerns, with the ultimate goal that all rental properties abide by current health and safety guidelines, including adequate plumbing, heating, and ventilation.

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<sup>19</sup> Calculated based on 2014-2018 CHAS, Table 13.

## MA-25 Public and Assisted Housing – 91.210(b)

### Introduction

#### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
			Veterans Affairs Supportive Housing				Family Unification Program	Disabled *	
# of units vouchers available	0	0	567	1,985	318	1,422	55	0	190
# of accessible units									

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 36 – Total Number of Units by Program Type

Data Source: Bellingham/Whatcom County Housing Authority (December 2022)

#### Describe the supply of public housing developments:

Since the previous Consolidated Plan, the City of Bellingham has contributed to several buildings that together add over 660 units to the supply of affordable housing for low-income and vulnerable residents. The largest projects are listed in chronological order below, and can also be viewed on an interactive map available at [Housing & Human Services \(arcgis.com\)](https://arcgis.com).

- **22 North**, 40 units of permanent supportive housing for formerly homeless adults, youth, and veterans, operated by Northwest Youth Services and the Opportunity Council. Completed in 2018.
- **Eleanor Apartments**, 80 units for low-income and homeless seniors, operated by Mercy Housing Northwest. Completed in 2019.
- **Heart House**, 11 units of permanent supportive housing for formerly homeless families, operated by Lydia Place. Completed in 2022.
- **Trailview Apartments**, 77 units for low-income and homeless families with children, operated by Mercy Housing Northwest. Completed in 2022.
- **Evergreen Ridge Apartments**, 145 units for low-income households, acquired by Mercy Housing Northwest in 2022 to prevent it being sold on the private market.

- **Samish Commons**, 171 units for seniors, families, and formerly homeless households, operated by the Bellingham Housing Authority. To be completed in 2023.
- **Laurel & Forest**, 56 units for low-income and homeless seniors, operated by the Opportunity Council. To be completed in early 2024.
- **Millworks**, 83 units for low-income families, operated by Merch Housing Northwest. It just broke ground in December 2022, and completion date is early 2024.

The City and our nonprofit partners are continually working to secure new sites and funding for permanently affordable housing. However, with construction costs being at an all-time high, the production of new public housing units still lags far behind the demand.

**Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:**

The Bellingham/Whatcom County Housing Authority (BHA/WCHA) has 567 public housing units (504 operated by BHA + 63 operated by WCHA) that participate in an approved PHA Plan. Units are maintained in a safe and sanitary manner and meet required inspections standards. A Real Estate Assessment Center inspection was completed on all units in December 2022 and scores ranged from 94 to 97 out of 100. That said, the housing authority must acknowledge that its portfolio is aging. Its three senior/disabled high rises are now over 50 years old and have significant needs that will require repair/replacement over the next 1-5 years. The Public Housing program receives an annual Capital Fund to undertake rehabilitation, modernization, and capital improvements. The Capital Fund is determined via HUD formula that varies from year to year. As an industry, it is widely acknowledged that the Capital Fund is grossly inadequate to address the growing needs of the Public Housing program. It is common for housing authorities to defer significant projects to accumulate multiple years' worth of capital funds to complete a project.

## Public Housing Condition

Public Housing Development	Average Inspection Score
Highrise Public Housing	97 out of 100
Family Public Housing	94 out of 100
Whatcom County Public Housing	96 out of 100

Table 37 - Public Housing Condition

### Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The majority of the Authority's housing stock is between 30 - 50 years old, and although these properties are well maintained, many systems are reaching the end of their useful life or obsolescence. Over the next 1-5 years, the housing authority will need to undertake substantial repair/replacement projects, in addition to the daily maintenance and turnover needs. Projects include repair/replacement of the high-rise waste lines, elevators, and generators. Replacement of roofs, gutters, windows, siding, and ventilation throughout its portfolio. Replacement of playgrounds at family properties. The housing authority also intends to create cooling rooms at its three high rise properties. This list is updated as new needs are identified and prioritized based off the urgency of the repair/replacement and funds available. The needs far outweigh available resources meaning that only the most significant and pressing needs can be addressed, which results in a backlog of preventative and proactive improvements.

### Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Housing Authority operates a strong preventative maintenance program in conjunction with the Capital Fund Grant program referenced above. Capital needs are assessed and prioritized annually, with adjustments during the year to accommodate emerging needs. Where possible, the Authority prioritizes projects that improve the living environment for its clients. Examples include exterior envelope upgrades to maximize energy efficiency, ventilation system upgrades to ensure airflow and healthy living environments, and safety/security upgrades adding cameras, signage and increasing lighting and sightlines. In response to our changing climate, the Authority is turning its attention, where possible, on increasing climate resiliency through energy conservation measures and the addition of cooling rooms in high-rise buildings that do not have air conditioning.

The Authority has also completed a staffing restructure to increase customer access and interaction. Client needs have increased, and with fewer referral support opportunities, the Authority is having to divert resources from other areas to close these gaps as much as possible. Traditional activities, such as resident meetings, social gatherings and classes were largely put on hold during the pandemic. It is the Authority's goal to resume these activities as much as possible but acknowledge that there is a significant strain on staff and resources navigating new challenges such as safety, substance abuse, behavioral health, and the impacts each have on residents, their homes, and the properties.

## MA-30 Homeless Facilities and Services – 91.210(c)

### Introduction

Bellingham’s homeless housing and service organizations participate in Whatcom County’s coordinated entry system, and a database called the Homeless Management Intake System (HMIS). Whatcom County was an early adopter of this system, which is now recognized as a best-practice for housing people effectively across multiple organizations. In addition, the County and the City are committed to a Housing-First model and prevention-based strategies. That means the same coordinated-entry system serves people who are at-risk of homelessness, currently homeless, and re-entering society from institutional settings.

### Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	36	67	65	34	8
Households with Only Adults	272	85	72	98	0
Chronically Homeless Households				138	
Veterans				50	
Unaccompanied Youth	16		4	20	

**Table 38 - Facilities and Housing Targeted to Homeless Households**

Note that many of the programs that serve homeless adults and children also serve chronically homeless households, but not exclusively. The figures above are not necessarily unduplicated, as some of the beds fall into multiple categories. For example, some projects have units designated for homeless and/or chronically homeless individuals. These units are represented in the other categories, and vouchers only for chronically homeless households are listed separately. The table above also includes vouchers where they are specifically for the utilization of the group listed (i.e., Veterans or chronically homeless households).

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

Some of the agencies listed in the following section provide mainstream services as well as services to the homeless in partnership with other nonprofits and the Homeless Services Center. In addition, mental health service agencies are in partnership with a number of housing facilities providing temporary, transitional or permanent housing for homeless, and bring case managers and health providers to housing facilities to offer case management, services and appointments on site.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

The Opportunity Council's Homeless Service Center, located in Bellingham, is the agency responsible for managing the coordinated entry system and rental assistance distribution in coordination with Whatcom County Department of Health & Community Services. All agencies that provide housing perform a standardized housing assessment that is administered at the point of entry. A standardized intake and vulnerability assessment is administered at entry and households are then referred to openings with the following partners:

- Catholic Community Services\*
- Interfaith Coalition
- Lighthouse Mission Ministries
- Lydia Place\*
- Mercy Housing Northwest
- Northwest Youth Services\*
- Opportunity Council\*
- Pioneer Human Services
- Sun Community Services
- YWCA

Other community partners that provide support to homeless households include:

- Catholic Community Services Recovery
- Compass Health
- Department of Social and Health Services (DSHS)
- Domestic Violence and Sexual Assault Services
- Lake Whatcom Treatment Center
- Low-Income Housing Institute
- Northwest Regional Council
- Road2Home

- SeaMar
- Unity Care NW
- Whatcom Alliance for Health Advancement

The Homeless Service Center supports key staff responsible for managing and coordinating across the partner agencies listed above. These are:

- HMIS Database Manager
- Homeless Outreach Coordinator
- Homeless Outreach Specialists
- Housing Referral Specialist
- Housing Retention Manager
- Landlord Liaison
- Leasing Specialist
- Motel program liaison
- Program Assistant

\*These partners receive County Rental Assistance through the coordinated entry system.

## MA-35 Special Needs Facilities and Services – 91.210(d)

### Introduction

The Special Needs populations with the greatest housing and service needs in our jurisdiction are the elderly population, persons with disabilities, victims of domestic violence, and persons with behavioral health needs (including people with alcohol and drug addictions). As Bellingham’s population ages and grows over time, the supportive housing and service needs of all these populations has continued to increase.

### **Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

The supportive housing needs of these Special Needs groups are described in detail in section NA-45. The facilities and services are described here.

#### Elderly and Frail elderly

Altogether, there are 13 Skilled Nursing Facilities, Adult Family Homes, and Assisted Living facilities in Bellingham, with a total capacity of 934 beds.<sup>20</sup> This does not include Senior Living or Retirement communities, which may provide meals and some services, but whose residents are capable of living independently and could live elsewhere in the community if they chose to. The table below shows the breakdown of long-term care facilities by type and which ones accept Medicaid. Of the 13 facilities listed below, 8 accept Medicaid, although that does not necessarily mean there are Medicaid beds available.

Facility Name	Accepts Medicaid?	Licensed Bed Count
Alabama House	Yes	12
Brookdale Fairhaven	Yes	60
Columbia Place	No	35
Cordata Court, Assisted Living & Memory Care	Yes	115
Highgate Senior Living	No	77
Lake Whatcom Residential & Treatment Center	No	67
Orchard Park Assisted Living	Yes	96
Rosewood Villa Assisted Living Community	Yes	70
Silverado Bellingham	No	85
Spring Creek Retirement & Assisted Living Community	No	122
Summit Place Assisted Living	Yes	47
The Bellingham at Orchard	Yes	76
Woodway Senior Living	Yes	72

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<sup>20</sup> Source: <https://fortress.wa.gov/dshs/adsaapps/lookup/BHPubLookup.aspx>

### Persons with disabilities

The majority of the public housing units managed by the BHA are for either seniors or people with disabilities. Throughout the community, there are also a handful of organizations that offer in-home care, permanent supportive housing, transitional housing, and emergency shelter to adults with developmental disabilities and other needs.

- Lighthouse Mission Ministries' Special Needs dorm: 10 emergency shelter beds
- Opportunity Council's Evergreen House: 3 rooms for permanent supported housing in a shared house
- Sun Community Services' Greggie's House: 6 bedrooms of permanent supportive housing in a shared house; Nevada Street: 3 bedrooms of permanent supportive housing

### Victims of domestic violence

Currently there are 167 beds/units in the city available to victims of domestic violence and their children. Not all of these beds are exclusively designated for those fleeing domestic violence. Some are available for women and children who are facing homelessness for other reasons, and many have domestic violence experiences in their backgrounds.

- DVSAS's Family Shelter: 22 beds
- DVSAS's Baker Place Shelter: 14 beds
- Lighthouse Mission Ministries' Agape Home: 60 beds (transitional housing for women and children)
- Lydia Place: 13 apartments
- Opportunity Council's Dorothy Place: 22 apartments
- YWCA's Larabee Residence: 27 beds (transitional housing) and 9 (emergency beds) for single women without children

### **Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

A few housing providers offer re-entry housing in the area, but there is not nearly enough unit availability to meet the demand. Pioneer Human Services provides re-entry housing in the City Gate Apartments, Sun Community Services provides housing for those with mental health challenges who are also re-entering the mainstream.

### **Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

The 2023 Action Plan includes housing and supportive services for special needs populations to remain stably housed. It's estimated that 60 households will benefit from Rapid Rehousing and Tenant Based rental assistance this year. Households are typically a mix of families with children, households with disabilities, those who are homeless-on-entry, single-parent households, and singles. 102 households are expected to be assisted through 4 project-based programs: 22 North, Sun Community Services 2 PSH

facilities, Francis Place, and Heart House. Many more households are benefited through outreach and navigation services.

In addition, the City will continue to fund housing case management and intensive case management through ongoing agency partnerships, most of which serve both homeless and housed individuals with mental and behavioral health challenges. These services are accomplished through our Housing and Human Services grants and linked to goals under those categories.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

N/A

## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

The major barriers to affordable housing in the jurisdiction are driven by market forces: demand for housing exceeds supply, rents and property values are rising, and wages are not increasing proportionate to housing costs. As in many cities, the high percentage of single-family zoning relative to the total land area is quite high, leaving little variation of housing types outside of downtown and urban villages. Meanwhile, most of our historic neighborhoods contain duplexes, small apartment buildings, and other multi-family housing types that continue to provide more affordable housing options.

Market-price residential investment is already incentivized in the private market through a healthy demand. The City currently encourages private investment in affordable housing by offering a 12-year tax reduction incentive to developers that build multi-family housing which is affordable to households whose income is at or below 60% of the Area Median Income (AMI). The affordable housing requirement can also be met, either partially or fully, for any units with two or more bedrooms that are available to households whose income is at or below 80% of median family income adjusted for family size. However, this tax incentive has not been utilized because there is another exemption that requires no affordable housing component and grants an 8-year tax exemption.

Policies which may have a negative effect on affordable housing are those which limit supply of new units: for example, zoning requirements, such as single-family zoning, minimum lot size requirements, and restrictions on infill development. Currently, 42% of the City's total land area is zoned for single-family residential use, compared to 14% which is zoned for multi-family residential use.<sup>21</sup> This zoning puts constraints on where more affordable multi-family housing units are permitted.

Other local public policy that limits the supply of available land is our relatively high percentage of greenspace and park lands. Bellingham voters cherish their parks and land conservation is a strong value for many residents. This makes Bellingham a beautiful place to live, with many opportunities for outdoor recreation and enjoyment. It also limits the amount of land that is available for development.

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<sup>21</sup> City of Bellingham Comprehensive Plan. Land Use chapter. Page 5.

## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

The City's primary role in economic development includes; 1) provide strong leadership to create a positive environment, both physical and social, that supports business activity and a high quality of life for employees and residents; 2) ensure that there is enough properly zoned, developable land and infrastructure capacity to accommodate the expected 20-year employment growth and provide and maintain high quality infrastructure to support employment lands and 3) provide excellent services that foster business growth and retention, and minimize expense.

The City partners with the Port of Bellingham and Whatcom County and pool resources to deliver direct economic development services by funding the Port's Regional Economic Partnership. This partnership oversees contracts with Western Washington University's Small Business Development Center, maintains the "Choose Whatcom" website and oversee various contracts and carries out a variety of economic development focused activities. The City has designated a liaison to for over a dozen agencies, including those mentioned above.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	678	459	2	1	-1
Arts, Entertainment, Accommodations	4,596	6,499	15	16	0
Construction	2,264	3,575	7	9	1
Education and Health Care Services	5,644	10,518	19	25	7
Finance, Insurance, and Real Estate	1,477	2,340	5	6	1
Information	808	947	3	2	0
Manufacturing	3,313	3,409	11	8	-3
Other Services	1,455	2,111	5	5	0
Professional, Scientific, Management Services	1,933	2,090	6	5	-1
Public Administration	0	0	0	0	0
Retail Trade	4,516	6,267	15	15	0
Transportation and Warehousing	794	448	3	1	-2
Wholesale Trade	1,120	1,080	4	3	-1
Total	28,598	39,743	--	--	--

**Table 39 - Business Activity**

Data 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)  
Source:

#### Labor Force

Total Population in the Civilian Labor Force	52,108
Civilian Employed Population 16 years and over	52,025

Unemployment Rate	5.1
Unemployment Rate for Ages 16-19	23.1
Unemployment Rate for Ages 20-24	6.1
Unemployment Rate for Ages 25-65	3.4

**Table 40 - Labor Force**

Data Source: 2017-2021 ACS (DP03)

Occupations by Sector	Number of People
Management, business and financial	20,416
Farming, fisheries and forestry occupations	354
Service	9,926
Sales and office	11,332
Construction, extraction, maintenance and repair	2,630
Production, transportation and material moving	5,459

**Table 41 – Occupations by Sector**

Data Source: 2017-2021 ACS (S2402)

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	34,170	84%
30-59 Minutes	5,055	12%
60 or More Minutes	1,380	3%
<b>Total</b>	<b>40,605</b>	<b>100%</b>

**Table 42 - Travel Time**

Data Source: 2013-2017 ACS

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,280	110	910
High school graduate (includes equivalency)	4,660	390	1,960
Some college or Associate's degree	8,545	765	3,505
Bachelor's degree or higher	14,055	370	2,350

**Table 43 - Educational Attainment by Employment Status**

Data Source: 2013-2017 ACS

## Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	140	125	170	330	425
9th to 12th grade, no diploma	810	610	485	575	555
High school graduate, GED, or alternative	3,955	2,190	1,305	3,510	2,860
Some college, no degree	10,810	3,125	1,780	3,700	2,410
Associate's degree	2,830	1,445	1,330	1,505	715
Bachelor's degree	2,180	4,270	2,750	4,115	2,915
Graduate or professional degree	60	855	1,770	3,035	2,270

**Table 44 - Educational Attainment by Age**

Data Source: 2013-2017 ACS

## Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	23,500
High school graduate (includes equivalency)	26,090
Some college or Associate's degree	31,610
Bachelor's degree	39,110
Graduate or professional degree	55,130

**Table 45 – Median Earnings in the Past 12 Months**

Data Source: 2013-2017 ACS

### Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The major employment sectors in Bellingham are Education and Health Care Services (19% of jobs), Arts, Entertainment, and Accommodation (15% of jobs), and Retail Trade (15% of jobs). Altogether these three sectors make up 49% of the share of all jobs. These numbers indicate that Bellingham's economy remains predominantly a service economy.

### Describe the workforce and infrastructure needs of the business community:

Workforce shortages continue to be problematic for businesses. Hiring and retaining staff remains challenging for most employers. Workforce shortages are leading to increased wages, yet increased wages are leading toward increased costs, especially in the service industries. Some parts of Whatcom County have deficiencies in broadband infrastructure, but Bellingham is fortunate to have an adequate supply. Businesses rarely identify infrastructure as an obstacle to doing business in Bellingham. Improving infrastructure in urban villages remains a priority for the City of Bellingham and well as investing in wetland mitigation banks. Lack of wetland mitigation banks contributes to some properties sitting vacant.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

Support for the childcare industry was a focus for the city prior to the pandemic and is now even more so. The City has used its American Rescue Plan Act funds to support construction of several new centers and create a business grant program to support the retention and expansion of this industry. Scholarship programs to support the childcare workforce is a priority in Bellingham and Whatcom County.

**How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

Home to a state university, community college, and a technical college, Bellingham has a highly educated workforce. Of adults aged 25 and over, 46% have obtained a bachelor's degree or higher, and 94.6% have at least a high school degree. Most of the jobs in the Education and Healthcare services require advanced degrees, so this highly educated workforce is a good fit with our major employers.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

The Opportunity Council conducts workforce training for low-income households, as does Worksource Whatcom and the Goodwill Job Training Center. The Opportunity Council does so as part of broader efforts that divert households from entering homelessness. Building the skills of the low-income workforce helping them to build assets yields more resilience to economic and household challenges, and ultimately less reliance on the services supported through this plan.

The Northwest Workforce Council (NWC) is the strategic and oversight body for the Northwest's workforce development system and is based in Bellingham. The NWC convenes partners, stakeholders, and elected officials in a myriad of strategy sessions ensures the system remains focused on the talent needs of business. One of their strategic goals is to align education, employment, and training services.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

Yes.

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

The jurisdiction is part of an Economic Development Strategy that encompasses all of Whatcom County. The capital project most relevant to the Consolidated Plan is to redevelop, through partnerships or other methods, city-owned properties, or chronic vacant buildings into mixed use developments compatible with the sub-area plans in an effort to spur additional private sector development to increase housing

and job opportunities. HOME and CBDG funds were listed as one potential source of funding, however such a project would be contingent on establishing other partnerships.

## **MA-50 Needs and Market Analysis Discussion**

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

No, because very few households in Bellingham have multiple housing problems: just 3% of renters and less than 1% of owner households have more than one housing problem. Because there are so few households with multiple housing problems, there are no areas where they are concentrated at a level that is detectable with the available data.

### **Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

There are no areas that meet the HUD definition of racially or ethnically concentrated areas of poverty. Using an alternative threshold of "above average," where the percentage of non-White households are above 15% and households below poverty level are above 25%, several census tracts in the jurisdiction 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.

Other micro-areas that have high concentration of low-income minority households are in the city's manufactured home parks (MHP). The City of Bellingham has 10 MHPs spread throughout the jurisdiction. They are about 2.5% of the total housing stock but represent 16% of the affordable housing.

### **What are the characteristics of the market in these areas/neighborhoods?**

There is a loose correlation between these neighborhoods and the percentage of multi-family housing and other kinds of affordable housing (like MHP). Like other areas of the city, the housing market is strong and there is high demand for all housing types, including rental apartments, condos, and manufactured homes.

### **Are there any community assets in these areas/neighborhoods?**

There are many community assets in all these areas. Most of these areas are close to one of the city's urban villages, which offer a variety of services and employment opportunities. Our Parks Levy ensures equitable access to parks, trails, and open spaces. Bellingham School District provides quality education opportunities in all our neighborhoods. There is a Family Resource Center at Shuksan Middle School (near the Cordata/Meridian neighborhood) and another at Carl Cozier Elementary School in the Puget neighborhood.

### **Are there other strategic opportunities in any of these areas?**

In April of 2022, the City Council voted to extend a moratorium on development applications and permits relating to the redevelopment of MHPs. Concerned residents, neighborhood groups, and city staff have been working with Resident Owned Communities (ROC) Northwest to educate residents about the potential to cooperatively purchase the land that these parks sit on to maintain affordability and resident control.

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

**Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

Almost all Bellingham residents have access to broadband internet services. Third party availability tools suggest that broadband availability for residents is between 98%-100%. There are multiple providers offering broadband services within the city limits to both residential and business customers. The city is not aware of specific neighborhoods lacking access to broadband services.

**Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

The City has franchise agreements in place with cable television providers Century Link and Comcast. Anywhere cable television is provided, Comcast also offers broadband internet service. Therefore, the entire Bellingham area is served with cable internet as well as television.

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

For consistency across the county, Whatcom County Sheriff Office's Division of Emergency, initiated the planning process for a County Natural Hazards Plan.<sup>22</sup> In the plan, which must be updated every 5 years, the City of Bellingham's portion of the plan includes mitigation measures for potential hazards including earthquakes, tsunamis, flood events, landslides, wildfires, sea level rise, and severe winter weather and windstorms. Of these events, those that are associated with climate change are:

- Flood events
- Wildfire smoke
- Severe heat
- Severe winter weather and windstorms

In Bellingham, almost 10% of the area is exposed to a flood related hazard. There is inland flooding which more heavily impacts residents, and coastal flooding, caused by sea level rise. The multiple creek systems going through Bellingham including Chuckanut, Padden, Silver/Bear, Squalicum, and Whatcom are subject to inland flooding. Flooding may cause disruption to roads such as Roeder Avenue. Flooding caused by melting snowpack is predicted to also become an issue, especially when combined with potential sea level rise.

As temperatures increase, and summers become longer, it is expected that severe wildfires brought on by hotter and drier summer conditions in the Pacific Northwest will increase unhealthy airborne particulate levels by 160% by 2050.<sup>23</sup> Drier seasons may cause vegetation to die off, creating more fuel for fires. If this vegetation is not managed, then the impact of wildfires such as unhealthy smoke, is likely to increase.

### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

Those who are unhoused and unsheltered are most vulnerable to all the above impacts of climate change and other natural disasters. In addition, our seniors and low-income residents living in older housing that lacks adequate insulation and ventilation are especially at risk during severe heat, cold, or smoke events.

Our Assessment of Fair Housing did not find any significant concentration of low- and moderate- income households in any one area that is also uniquely at risks associated with climate change or natural disaster. One exception may be residents of manufactured home parks, which tend to be predominantly occupied by low- and moderate-income households.

In the Pacific Northwest, our traditionally mild climate means that only a small percentage of homes are equipped with air conditioning. This includes many of our older public housing units. During extreme

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<sup>22</sup> Whatcom County Natural Hazard Mitigation Plan: City of Bellingham. September 30, 2021. Available at: [2021-NHMP-BELLINGHAM \(whatcomcounty.us\)](https://www.whatcomcounty.us/NHMP-BELLINGHAM)

<sup>23</sup> National Climate Assessment: Chapter 24, Northwest. [Northwest - Fourth National Climate Assessment \(globalchange.gov\)](https://www.globalchange.gov/)

heat or fire events, residents have little reprieve from the heat and must be able to access public or congregate spaces where they can cool down.

The Bellingham/Whatcom County Housing Authority (BHA) has consulted with the Whatcom County Office of Emergency Management to explore possible cooling room solutions for its 3 high rise properties and potential funding sources. The City of Bellingham is committed to working with all housing grantees to ensure that they have a severe weather plan, and that low-income housing providers can ensure that residents remain indoors and safe during severe heat and smoke events.

More concerning is the communities challenge with substance abuse, behavioral health, homelessness, and law enforcement reforms. BHA residents and program participants, especially those exiting homelessness or treatment programs, are extremely vulnerable to being taken advantage of, risking their health, their safety and ultimately their housing. High rise residents are consistently confronted by people wanting to gain access to common areas to camp, do drugs, and steal. Law enforcement is largely unable to respond, leaving BHA staff in a position of confronting and trying to remove those who wish to do harm on. In recent months, there has been an increase in assaults on staff. The BHA is focusing efforts on training and working with the police department as much as possible to prevent such incidents and protect its residents. It's also important to acknowledge the increasing use of meth and fentanyl in our community. The BHA, like all landlords, are facing increasing challenges to test and remediate units that have been contaminated. With changing rental protections, increasing notice periods, contamination levels are getting higher, requiring deeper levels of remediation, increasing the expense to rebuild, further straining limited financial resources, removing a critical housing unit for months and most importantly, potentially impacting other residents in the property. This is a growing community health problem that requires immediate attention.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The City of Bellingham's Strategic Plan outlines the housing and community development goals and strategies to meet the priority needs with available resources. This Plan covers the period from July 1, 2023, through June 30, 2027. This Strategic Plan is aligned with the Assessment of Fair Housing, which was updated on November 23, 2022, to cover the period through June 30, 2027.

The City anticipates receiving continued federal entitlement grants through HUD in the next five years. The two entitlement grants include Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). The City also anticipates continuing to receive funding from local sources.

This Strategic Plan is written to meet the requirements of HUD that provides financial resources to implement the plan. It is also written to be consistent with the 2012 Housing Levy Administrative and Financial Plan, which governs the use of local Housing Levy dollars, and the City of Bellingham Council's Legacies and Strategic Commitments, which is the framework the City uses to align City commitments with needs. These guiding frameworks align well with one another, are consistent and reinforcing.

## **SP-10 Geographic Priorities – 91.215 (a)(1)**

### **Geographic Area**

#### **Table 46 - Geographic Priority Areas**

### **General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The city's Plan does not propose geographic priorities in this planning period. Our Assessment of Fair Housing did not reveal any concentrated areas which lack access to opportunity in the jurisdiction, and public comments emphasized that affordable housing is needed in all areas. With ever increasing property costs, formerly affordable neighborhoods are losing affordable housing stock to sales, redevelopment, and rental increases. It is for that reason that this Consolidated Plan will focus primarily on diversifying our affordable housing stock and on adding new affordable housing in all neighborhoods, instead of concentrating it only in neighborhoods where poverty rates are already above average.

## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

Table 47 – Priority Needs Summary

1	<b>Priority Need Name</b>	Affordable housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Small Families Large Families Families with Children Elderly Public Housing Residents Individuals Families with Children Veterans
	<b>Associated Goals</b>	Reduce cost burden
	<b>Description</b>	The greatest need in our community is to assist those with the lowest incomes. An estimated 80% of all households earning 50% AMI are cost burdened. The private market is unable to meet this demand without assistance. The rise in housing costs, together with historically low vacancy rates and cost-of-living inflation, makes it very difficult for low-income folks to find and affordable housing. With vacancy rates hovering around 2%, the city has a severe shortage of rental housing and homeownership options for those earning 80% AMI or less. There is a need for all methods available to reduce housing cost burden, including homeownership, new construction of permanently affordable housing, subsidized rental housing, and preservation of existing affordable housing. This also includes researching and fostering more creative solutions for shared-equity housing, including shared equity cooperatives and resident-owned manufactured home parks.
	<b>Basis for Relative Priority</b>	The need for more affordable housing of all types is the highest priority because it exacerbates needs for other programs and services.
2	<b>Priority Need Name</b>	Housing services
	<b>Priority Level</b>	Med

	<b>Population</b>	Families with Children Elderly Chronic Homelessness Individuals Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence
	<b>Associated Goals</b>	Provide vulnerable households with services to remain stably housed
	<b>Description</b>	While housing cost is a major factor, many households are also homeless or at risk of losing their housing due to reasons including chemical dependency, mental health issues, and domestic violence. Nearly half of homeless households in need of assistance (on the Housing Pool) could benefit from permanent supportive housing. Many more have other complex behavioral needs beyond housing alone. Our community is learning that we must also include housing services to keep the most vulnerable households and individuals stably housed.
	<b>Basis for Relative Priority</b>	Housing alone is inadequate for those with special needs; it often must be coupled with specialized supports
<b>3</b>	<b>Priority Need Name</b>	Basic needs
	<b>Priority Level</b>	Med

	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children veterans Persons with HIV/AIDS Elderly Frail Elderly
	<b>Associated Goals</b>	Help vulnerable households to meet their basic needs
	<b>Description</b>	Help to fill gaps in basic needs to low-income persons and households, such as food, hygiene, and childcare. In addition, there are other basic needs such as literacy, job, training, and social connection for special needs populations that tend to be isolated. In many cases, community facilities (like senior and childcare centers) are where people receive these services and get their basic needs met.
	<b>Basis for Relative Priority</b>	With housing costs continuing to rise, it leaves low-income and even moderate-income households with less money for other necessities, like food, clothing, childcare, hygiene, and transportation. Many service providers of basic needs are seeing an increase in need.
<b>4</b>	<b>Priority Need Name</b>	Safe shelter
	<b>Priority Level</b>	Med

	<b>Population</b>	Extremely Low Low Families with Children Elderly Chronic Homelessness Individuals Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence
	<b>Associated Goals</b>	Increase safety for vulnerable populations
	<b>Description</b>	With homelessness continually on the rise, the Whatcom County housing service providers have had to prioritize housing and services for the most vulnerable populations: families with children, seniors, and those who are medically fragile. That leaves many other individuals unhoused and in need of basic shelter. Especially as climate change is making severe weather events more common, the city is committed to the goal anyone who needs emergency shelter can find at least a safe bed for the night. Our community currently lacks shelter options that are suitable for many groups, especially families with children.
	<b>Basis for Relative Priority</b>	Having a place to shelter, especially during severe weather events, is a public health need
5	<b>Priority Need Name</b>	Fair Housing education and enforcement
	<b>Priority Level</b>	Med
	<b>Population</b>	Low Moderate Large Families Individuals Families with Children Elderly Public Housing Residents
	<b>Associated Goals</b>	Prevent housing discrimination and increase protections for low-income renters

<b>Description</b>	<p>With a tight housing market and low vacancy rate, it is important to make sure that property owners and tenants are aware of their rights and responsibilities, and are abiding by all local, state, and federal laws. This need incorporates two goals from our Assessment of Fair Housing:</p> <ul style="list-style-type: none"> <li>• Support people who face housing discrimination by examining where the city may add additional supports or protections</li> <li>• Provide education on Fair Housing to property managers and owners, as well as tenants, to increase public understanding of Fair Housing laws</li> </ul>
<b>Basis for Relative Priority</b>	<p>The city has a role to play in educating the community and collaborating with other agencies who are involved with the rental market.</p>

## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Market rents, vacancy rates, available units
TBRA for Non-Homeless Special Needs	Market rents, vacancy rates, available units, capacity of supportive services
New Unit Production	Construction costs, land availability, tax credit priorities, financing
Rehabilitation	Available contractors, financing
Acquisition, including preservation	Land availability, financing

Table 48 – Influence of Market Conditions

# SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

## Introduction

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	808,663	210,000	800,000	1,630,000	4,074,652	Funds used for priority needs, including preservation of housing stock, lead-based paint, public improvements, public services and administration and planning.
HOME	public - federal	Acquisition Homebuyer assistance	647,380	210,000	0	860,000	3,429,520	Funds used for homebuyer assistance, tenant-based rental assistance, housing

		Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA						development (including CHDOs) and administration.
HOME	public - federal	Multifamily rental new construction Public Services TBRA Non-congregate shelter			2,000,000	2,000,000		Funds used according to the HOME-ARP allocation plan
Other	public - local	Acquisition Admin and Planning Homebuyer assistance Homeowner rehab Housing	7,000,000	0	0	7,000,000	28,000,000	The City of Bellingham has a housing levy and sales tax that support development and preservation of housing, as well as rental assistance and housing services.

		Multifamily rental new construction Multifamily rental rehab New construction for ownership Public Services TBRA						
Other	public - local	Admin and Planning Public Services TBRA	500,000			500,000	2,000,000	This is the city's investment in housing, human and social services.

**Table 49 - Anticipated Resources**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

For every dollar of federal funds, the City expended on activities that were completed, the City typically leverages at least \$8 of non-federal funds. Leveraging is expected to be higher for larger construction projects that utilize significant private and state resources and the federal low-income housing tax credit program. Human (public) service grants leverage considerable funding from non-federal sources, tapping into the local commitment of nonprofit agencies delivering critical services to our community.

Bellingham voters have twice approved a Housing Levy that currently assesses \$4 million per year to address housing development/preservation and housing services, and the City also brings in an additional \$7 million per year with an affordable housing sales tax. These funds are used to

help support capital costs, rent and services for some federally funded projects, thus contributing to the matching requirements. The Housing Levy continues through the end of 2028. The needs, priorities and strategies of the Consolidated Plan are assisted by these additional resources in the community.

**If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The City has an analysis of underutilized land owned by the jurisdiction which is in play as we move forward with agency partnerships to implement the plan. Several of these parcels have been utilized for affordable housing in the past, and the City continues to look for additional strategic land acquisitions and creative partnerships to create future affordable housing opportunities.

**Discussion**

City funding for most housing projects typically includes other funds to complete a project. Nonprofit housing developers have been successful in obtaining Washington State Housing Trust Fund allocations and Low-Income Housing Tax Credit investments. The City's funding has been successful at leveraging significant non-federal sources.

## **SP-40 Institutional Delivery Structure – 91.215(k)**

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

<b>Responsible Entity</b>	<b>Responsible Entity Type</b>	<b>Role</b>	<b>Geographic Area Served</b>
City of Bellingham	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
Bellingham/Whatcom County Housing Authority	PHA	Homelessness Non-homeless special needs Planning Public Housing Rental	Region
Whatcom County Department of Health & Community Services	Government	Homelessness Non-homeless special needs Planning public facilities public services	Region
Opportunity Council	CHDO	Homelessness Non-homeless special needs Planning Rental public services	Region
Kulshan Community Land Trust	CHDO	Ownership	Region
Catholic Housing Services	Non-profit organizations	Homelessness Non-homeless special needs Rental	Region
Mercy Housing Northwest	CHDO, Non-profit organizations	Homelessness Non-homeless special needs Rental	Region
Low-Income Housing Institute	Non-profit organizations	Homelessness	Region

**Table 50 - Institutional Delivery Structure**

**Assess of Strengths and Gaps in the Institutional Delivery System**

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

<b>Homelessness Prevention Services</b>	<b>Available in the Community</b>	<b>Targeted to Homeless</b>	<b>Targeted to People with HIV</b>
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
<b>Street Outreach Services</b>			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X		
Transportation	X		
<b>Other</b>			
Other	X	X	

**Table 51 - Homeless Prevention Services Summary**

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

The City of Bellingham Planning & Community Development Department is responsible for the planning, development, and implementation of the CDBG and HOME Programs, along with the local housing levy and affordable housing sales tax. The network of institutions through which housing and community development programs are carried out in the city is broad-based, and includes private industry, non-profit organizations, and public institutions.

The city partners with many smaller agencies, in addition to those listed above; the following are agencies the City is likely to provide funding or other partnership to in order to carry out the delivery of the projects:

- Domestic Violence and Sexual Assault Services, Nonprofit

- Interfaith Coalition, Nonprofit
- Lighthouse Mission Ministries, Nonprofit
- Lydia Place, Nonprofit
- Northwest Youth Services, Nonprofit
- Pioneer Human Services, Nonprofit
- Road2Home, Nonprofit
- Sean Humphrey House, Nonprofit
- Sun Community Services, Nonprofit
- YWCA, Nonprofit

Human services are delivered to people experiencing homelessness through a network of governmental and nonprofit agencies throughout the community. The Homeless Service Center (HSC), a program of the Opportunity Council, operates a centralized and coordinated homeless housing service center that serves the homeless population in the City of Bellingham. This Center serves as a hub for all homeless housing related activity in the community, including the coordination of homeless housing service providers and the management of the local homeless management information system (HMIS) by operating a single point of entry.

The needs are not being adequately met, even with the strong partner agencies in the community. Especially with regard to families with young children who are homeless either by the HUD or McKinney-Vento definition, the needs are rising tremendously, and the upstream impacts are dramatic. For this reason, families with children are a preferential population going into this next Consolidated Planning period, and we must work with these partners to better meet their needs.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

Counseling and advocacy—People who are homeless or at risk of becoming homeless enter the housing system and are assigned case management from an array of partnering, non-profit housing agencies. Housing counseling and advocacy become a significant part of the case management support provided. More general counseling and advocacy services are also available to low-income people at the Community Resource Center which offers information and referrals.

Rental assistance—The HSC administers rental subsidies (local funds) to homeless and at-risk households and matches the subsidy with case management support provided by themselves or one of several partnering, nonprofit housing agencies. Families with children, youth, seniors, and veteran households are among the populations that are supported by rental subsidies and case management. Additionally, the HSC administers Supportive Housing Program subsidies to people who are chronically homeless. HSC also operates diversion services to help prevent homelessness.

Shelter operators – Over the past several years, the City and County have worked with the Lighthouse Mission Ministries, Low-income Housing Institute, Road2Home, YMCA and others to substantially expand the offerings of shelter, including emergency shelter.

Law Enforcement and Paramedics—Bellingham’s Police Department, as many throughout the State and nation, is struggling with retirements far outpacing recruitment efforts. Fewer people are choosing this field as a career path. As a result, many of the special teams, such as neighborhood police officers, are not filled at this time. Fortunately, the City and County created GRACE, an Intensive Case Management program to work in concert with the Bellingham Police Department and the Bellingham Fire Department. GRACE targets both housed and homeless people who have frequent interactions with the emergency and criminal justice system and are vulnerable to victimization.

Mobile clinics—SeaMar and Unity Care Northwest work in partnership with agencies serving the homeless to provide medical care, including on-site medical care services are available at the Lighthouse Mission Drop-In Center one day per week. The Project Homeless Connect event brings in mobile dental clinics once a year for homeless and low-income people to receive free dental services.

Outreach Services—The City supports the Homeless Outreach Team that operates out of the HSC. This is a team that regularly is on the street and in camps interacting with people experiencing homelessness. The team provides referrals and assistance and are experts in the variety of services available locally. Bellingham has a variety of other outreach services targeting the homeless population: Homeless Disability Benefits Advocacy Program, Drop-In Center run by Lighthouse Mission, a Compass Health Mobile Outreach Team, and several meal programs.

Alcohol and Drug Abuse & Mental Health Counseling—Whatcom County Behavioral Health Access Program is targeted to low-income residents and are available to homeless individuals. There are also mental health specialists assigned to work with homeless and formerly homeless persons at Francis Place, City Gate Apartments and at the Northwest Youth Services youth shelter.

Child Care—Opportunity Council operates an Information and Referral service for licensed day care providers and provides day care vouchers to homeless families. In addition, in November 2022, Whatcom County passed a levy for families and children. The new property tax will collect an estimated \$10 million per year for childcare, preschool education, and related programs, although the exact details of programs to be funded are still unknown.

Employment and Employment Training—The following are just some of the programs and employment and job training programs that serve people who are homeless in Bellingham: WorkSource One-Stop Center, OC employment specialist, Lake Whatcom Treatment Center and Compass Health employment specialists, Northwest Youth Services jobs training, and Department of Vocational Rehabilitation.

Healthcare—Healthcare services for people who are homeless are coordinated through two local community health centers, Unity Care Northwest, PeaceHealth St. Joseph Medical Center social workers.

Transportation—Whatcom Transportation Authority provides nonprofit social service providers free and discounted bus tokens and passes for their homeless clients.

**Strengths Service Delivery:**

- Strong collaborative partnerships among funders (City and County), health care providers and with law enforcement
- Centralized, coordination of providers and their services

- Ability to manage and report comprehensive data (especially HMIS), including outcomes data that attract and leverage funds
- Comprehensive primary care and wrap-around services
- Continuum of care and care coordination (primary care, hospital, supportive services organizations)
- Strong client support/advocacy organization

**Gaps of Service Delivery:**

- Insufficient subsidized and affordable housing units and rental subsidy, especially for extremely low-income families, seniors, and people with physical disabilities
- Insufficient program openings for families with children in crisis (shelter, interim, and permanent housing programs), resulting in compounding trauma and significant downstream societal impacts
- Insufficient case management support, households must be prioritized by most vulnerable first
- Individual service providers have limited capacity and workforce challenges
- Not enough permanent supportive housing, long-term care, or assisted living, especially for people who are chronically homeless or medically fragile
- Homeless and runaway youth must get parent permission to utilize emergency shelter
- There is a need to grow the intensive case management system that offers coordination between health care systems, emergency services, criminal justice, and housing to respond quickly to vulnerable people who are frequent users of emergency services
- Transportation options for clients

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The City’s main strategy is to Create more affordable housing units, including set asides for permanent supportive housing units that are operated with housing-first or harm reduction principles.

The City is also committed to continually coordinating with stakeholders and other funders to identify and address gaps wherever possible and to supporting our partner agencies to meet the rising services needs in our community through capacity building.

For example, City staff coordinated relevant stakeholders to identify and address the steep rise in homelessness among families with children. A detailed strategy for addressing the gaps identified by the Families with Children Strategy workgroup is forthcoming.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
1	Reduce cost burden	2023	2027	Affordable Housing Homeless Non-Homeless Special Needs	Affordable Housing	HOME CDBG City Levy & ST	Rental units constructed Homeowner Housing Rehabilitated Direct Financial Assistance to Homebuyers Rental Units Rehabilitated
2	Provide vulnerable households with services to remain stably housed	2023	2027	Affordable Housing Homeless Non-Homeless Special Needs	Housing Services	HOME HOME-ARP CDBG City Levy & ST	Public service activities for Low/Moderate Income Housing Benefit Tenant-based rental assistance / Rapid Rehousing
3	Help vulnerable households to meet their basic needs (other than housing)	2023	2027	Homeless Non-Homeless Special Needs Non-Housing Community Development	Basic Needs	CDBG City GF	Public service activities other than Low/Moderate Income Housing Benefit
4	Increase safety for vulnerable populations	2023	2027	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Safe Shelter	HOME CDBG City Levy & ST City GF	Homeless Person Overnight Shelter Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit

5	Prevent housing discrimination and increase protections for low-income renters	2023	2027	Advocacy and Service Delivery	Fair Housing Education & Enforcement	HOME CDBG City Levy & ST City GF	Other
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Table 52 – Goals Summary

**Goal Descriptions**

1	<b>Goal Name</b>	<b>Reduce cost burden</b>
	<b>Goal Description</b>	The greatest need in our community is to assist those with the lowest incomes with housing. The private market is unable to meet the demand for affordable housing units without assistance. The rise in housing costs, together with historically low vacancy rates and sluggish wage growth, makes it very difficult to find affordable housing. This goal includes the construction of new low-income rental housing, rehabilitation of owner-occupied and rental housing for low-income residents, and supporting down payment assistance and new homeownership opportunities.
2	<b>Goal Name</b>	<b>Provide vulnerable households with services to remain stably housed</b>
	<b>Goal Description</b>	Many households need more than a housing unit to maintain their housing stability. Support navigation programs for households vulnerable to homelessness, as well as rental assistance, case management, and homeless prevention and diversion programs.

3	<b>Goal Name</b>	<b>Help vulnerable households to meet their basic needs (other than housing)</b>
	<b>Goal Description</b>	Support the ability of households to address their non-housing basic needs and services such as through food security, childcare, literacy, violence-prevention, health and disability services, and senior assistance programs.
4	<b>Goal Name</b>	<b>Increase safety for vulnerable populations</b>
	<b>Goal Description</b>	Support day and nighttime assistance for very vulnerable populations including through the provision of shelter, behavioral health, hygiene and service day centers. Improve resiliency and disaster preparedness.
5	<b>Goal Name</b>	<b>Prevent housing discrimination and increase protections for low-income renters</b>
	<b>Goal Description</b>	Education and administration funding. This includes public education on Fair Housing and housing issues, outreach to funding decision-makers and policy makers. This includes administration of all funding programs.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

A total of 380 affordable housing units are estimated for the five-year period of this Strategic Plan. The housing would be provided to the following income targets:

- Extremely low-income (<30% AMI): 114 units (30% of total)
- Very Low-income (>30% and <=50% AMI): 213 units (56% of total)
- Low-income (>50% and <=80% AMI): 53 units (14% of total)

It is estimated that 87% of the housing funding would be allocated to rental housing units, of which 35% would go to extremely low-income, 56% to low-income and 9% to moderate-income.

Assistance for homeowners would have 100% benefit low-income.

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

N/A

#### **Activities to Increase Resident Involvements**

The Housing Authority created an agency-wide strategic plan in 2019. Two significant components of that plan were focused on improving customer access and ease of use to authority provided programs, and providing greater support in helping current participants maintain their housing opportunities. As a result, the Housing Authority restructured their housing programs team, and launched the following new initiatives:

- An online applicant portal to provide easy access to apply for housing programs.
- An online participant portal to provide a convenient way to communicate with staff, complete program recertifications, request maintenance work orders, etc.
- An electronic rental payment system.
- Restructured the housing programs teams, focusing in three key areas: eligibility, compliance, and property management, to provide increased expertise and participant support in each respective area.
- Improved collaboration, information sharing, and partnership with the resident council and program participants.

In January 2023, the Housing Authority hired two Property Managers who work directly with BHA public housing residents. Part of their duties is to engage residents through a variety of methods (office hours, educational trainings, informational meetings, newsletters, social gatherings, etc.) to increase resident involvement in their community.

#### **Is the public housing agency designated as troubled under 24 CFR part 902?**

No.

#### **Plan to remove the ‘troubled’ designation**

N/A

## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

The major barriers to affordable housing in the jurisdiction are driven by market forces: demand for housing exceeds supply, rents and property values are rising, construction costs are at an all-time high, and wages are not increasing proportionate to housing costs. In this scenario, the private market does not (and arguably cannot) provide housing that is affordable to below-median income earners, and waitlists for subsidized housing are long.

There is no need to encourage residential investment in general, as that is already incentivized in the private market through a healthy demand. How other specific public policies which affect housing and residential investment are always open to debate. Policies which may have a negative effect on affordable housing are those which limit supply of new units: for example, zoning requirements, such as single-family zoning, minimum lot size requirements, and restrictions on infill development. Currently, 42% of the City's total land area is zoned for single-family residential use, compared to 14% which zoned for multi-family residential use.<sup>24</sup> This zoning puts constraints on where more affordable multi-family housing units are permitted.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

Based our Assessment of Fair Housing, data analysis, and robust public feedback, the City proposes the following strategies to remove or ameliorate barriers to affordable housing:

- Support the acquisition, preservation, and development of housing units affordable for low-income residents
- Maintain the City's proactive role in affordable housing development
- Support homeownership for low to moderate income households, especially for minority households and households with young children
- Foster creative solutions for alternative ownership models, including through shared equity, resident-owned communities, and cooperative housing
- Offer rental assistance for vulnerable households, prioritizing homeless families with children and medically fragile seniors, as well as severely cost burdened families with young children
- Promote mixed income neighborhoods
- Offer home rehabilitation loans with favorable terms for low-income homeowners – especially for those who are elderly or disabled

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<sup>24</sup> City of Bellingham Comprehensive Plan. Land Use chapter. Page 5.

## **SP-60 Homelessness Strategy – 91.215(d)**

The Whatcom County Department of Health & Community Services is the lead agency for the homelessness strategy and continuum of care in our community. The City's plans support these strategies.

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The city-funded Homeless Outreach Team (HOT) has continued to operate and be an invaluable resource to the community and unsheltered population. Their focus is on reaching out specifically to unsheltered persons to build relationships and align them with services and housing, based on the specific needs of each individual. HOT conducts outreach five days per week, including outreach to homeless encampments.

The City also supports the Ground Floor, an outreach location run by Northwest Youth Services targeted at reaching homeless youth and connecting them to housing and services. The Ground Floor served 352 unduplicated youth, and provided over 3,000 distinct services per year.

### **Addressing the emergency and transitional housing needs of homeless persons**

The City of Bellingham continues to be active on workgroups and task forces to collaborate with regional agencies, the county, local non-profits, and the faith community to address the need for emergency shelter and transitional housing.

The City continues to fund emergency winter motel stays through nonprofits serving homeless families and chronically homeless persons, including supporting this year-round. The City also now supports an established tiny house village in collaboration with the Low Income Housing Institute and Road2Home (a local nonprofit) that provides 35 tiny houses and serves up to 50 individuals (individuals and couples). In addition to this new capacity, the following are still operational in this community:

- YWCA 9 alcove beds + 5 additional emergency beds for senior women;
- Sun House 9 beds;
- NWYS PAD shelter for youth up to 12 beds;
- Lighthouse Mission 'Base Camp' 200 beds + 30 overflow beds in winter;
- Interfaith Coalition 4 family units;
- DVSAS 47 individuals fleeing domestic violence;
- HomesNOW 45 beds in tiny house villages (on City property)

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.**

The City of Bellingham and our partners are committed to a housing-first model and prioritize homelessness prevention for families. The City funds multiple programs focused on helping vulnerable individuals and families avoid becoming homeless, such as Lydia Place, Northwest Youth Services, and

the Bellingham Housing Authority. With the City's support, Northwest Youth Services continues to operate a low-barrier day shelter where youth can access services and complete intake assessments to become eligible for housing programs, as well as an interim facility for underage youth.

The county operates a coordinated entry system for households who are already homeless. The City helps to fund this system through support of the Homeless Service Center, along with several service activities and rental assistance programs which help individuals and families avoid becoming homeless, including continued funding for the Housing Lab program. This service is a resource for households whose vulnerability is not high enough for them to qualify for full case management services, but who still struggle to find housing in the tight rental market.

While all of these have had challenges maintaining services and supporting and keeping staff through the pandemic, they have all adapted and are still able to serve the community. Our biggest issue is a lack of housing units available for all who need them, and secondly, a shortage of housing case managers, mental health counselors, and other staff trained to support these households.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

The City helps fund several transitional housing and shelter programs, as well as the Homeless Outreach Team (mentioned earlier). Each have an expectation to help as many persons as possible transition to permanent housing and independent living. However, the numbers of those in need – especially families with children – continue to grow at a rate that outpaces our community's capacity to assist all who need help.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

Since 2001, 273 low-income homes have been rehabilitated under the Home Rehab Loan Program, run by the City of Bellingham. Many of these homes required lead-based paint stabilization. As part of our Strategic Plan, building new affordable housing and acquiring and refurbishing existing affordable housing will further increase access to housing which is free from LBP. Since 2018, 43 income-qualified households were rehabilitated through the Home Rehab Program. Of those, 18 (42%) required lead paint stabilization to HUD standards.

Tenant-based rental assistance units built before 1978 and funded by the city are given a visual assessment for lead-based paint. Any deteriorated/flaking paint is required to be stabilized prior to renting to households with children under 6 years of age. Multifamily properties funded with HUD funds are routinely monitored. Those properties built before 1978 are visually assessed for deteriorated paint. All lead-painted surfaces with deteriorated paint are required to have the paint stabilized.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

We estimate there are 2,100 households in Bellingham that are at risk of lead-based paint because of the age of housing and presence of young children (minus the number that have participated in the Home Rehab Program since it's inception). The actions listed above greatly reduce the potential for lead poisoning by requiring stabilization of lead painted surfaces.

### **How are the actions listed above integrated into housing policies and procedures?**

The city plans to continue the Home Rehab Program, which will provide an opportunity for low-income, owner households to address LBP hazards. This program will continue to provide opportunities for income-qualified households to rehabilitate their houses. Houses built before 1978 will continue to be required to have a lead paint risk assessment performed. Deteriorated lead-painted surfaces will be required to be stabilized to HUD standards. City funds pay for the lead risk assessment and clearance testing through a "Hazardous Materials" grant. Other multi-family units built before 1978 that receive federal assistance will be required to have deteriorated lead-based painted surfaces stabilized to help maintain a safe and healthy living environment.

## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

According to the 2021 5-year ACS, there are 16,946 people in Bellingham who live below the Federal poverty level – or about 20% of the population. Over half (55%) of those whose incomes are below the poverty level are in the 18-24 age group, and are likely to be majority college students. Still, that leaves many other seniors and families who are also living below the Federal poverty level, including over 2,000 children.

An anti-poverty strategy requires coordination between agencies and service providers at many levels. While the City of Bellingham is not the lead agency for homelessness, social services, economic development or training, it does provide a critical role in addressing the cycle of poverty within our community through the many programs and services we support.

The Whatcom Asset Building Coalition (WABC -- <http://www.whatcomabc.org>) is a community collaboration supporting financial self-sufficiency through education and advocacy. The is a longtime funder of the Whatcom Literacy Council's "Gaining Jobs & Self Sufficiency Through Literacy" program, which helps break the cycle of poverty by teaming English language learners and illiterate adults with trained volunteers to work on their educational and career goals. Housing case management services provided by other organizations also include help with budgeting, credit repair, and financial management skills. Other case management services may include help with longer-term goal setting around employment or education.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

Bellingham's main role in reducing poverty is to ensure more households obtain housing that is affordable to enable them to save money and reach their financial and personal goals. The City's Planning & Community Development staff coordinate regularly with other service providers who are focused on economic development, and other city departments that focus on equitable access to services and opportunities.

## **SP-80 Monitoring – 91.230**

**Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

The City of Bellingham executes funding agreements (“contracts”) for all its CDBG and HOME activities, as well as activities carried out with Levy, City General Funds, or combination funding. These contracts meet all the applicable program and federal requirements. The City monitors contracts for compliance with these program requirements, including general management, performance goals, financial management, data collection and reporting, eligibility determinations, nondiscrimination, fair housing, affirmative marketing, labor compliance, etc.

The City has adopted HOME monitoring procedures to ensure that HOME funds are used consistent with the program requirements. The monitoring objectives are:

- Ensure compliance with HOME and other regulations,
- Ensure production and accountability,
- Provide a basis for program and project performance evaluations,
- Increase communication between the City and Subrecipients, and
- Improve program designs and processes.

The HOME monitoring includes project-based risk assessment, as well as required property and record inspections. Annual monitoring of Tenant-Based Rental Assistance is required by HOME rules, and is implemented by the City.

The City also conducts monitoring of its CDBG and locally-funded activities, which varies depending on the activity. Construction or acquisition projects are monitored as they progress in order to ensure compliance with specific applicable requirements, including Davis-Bacon, Section 3, NEPA, and Uniform Relocation and Acquisition requirements. Funds that are used for public (human) service activities are monitored using a risk-based assessment system. The objective of this monitoring is similar to the HOME objectives, with particular emphasis on income screening, performance reports, records and financial management systems.

The City works in coordination with the state and county when the same programs or projects are funded by these agencies to coordinate and improve systems for the monitoring agencies and the agencies being monitored.

The City also uses the Consolidated Annual Performance and Evaluation Report (CAPER) as a tool for monitoring the City's performance against Consolidated Plan goals.

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	808,663	210,000	800,000	1,630,000	4,074,652	Funds used for priority needs, including preservation of housing stock, lead-based paint, public improvements, public services and administration and planning.
HOME		Acquisition	647,380	210,000	0	860,000	3,429,520	Funds used for homebuyer assistance, tenant-based rental

	public - federal	Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA						assistance, housing development (including CHDOs) and administration.
HOME	public - federal	Multifamily rental new construction Public Services TBRA Non-congregate shelter			2,000,000	2,000,000		Funds used according to the HOME-ARP allocation plan
Other	public - local	Acquisition Admin and Planning Homebuyer assistance Homeowner rehab	7,000,000	0	0	7,000,000	28,000,000	The City of Bellingham has a housing levy and sales tax that support development and preservation of housing, as well as rental assistance and housing services.

		Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership Public Services TBRA						
Other	public - local	Admin and Planning Public Services TBRA	500,000			500,000	2,000,000	This is the city's investment in housing, human and social services.

**Table 53 - Expected Resources – Priority Table**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

For every dollar of federal funds the City expended on activities that were completed, the City typically leverages at least \$8 of non-federal funds. Leveraging is expected to be higher for larger construction projects that utilize significant private and state resources and the federal Low-Income Housing Tax Credit program. Human (public) service grants leverage considerable funding from non-federal sources, tapping into the local commitment of nonprofit agencies delivering critical services to our community.

Bellingham voters have twice approved a Housing Levy that currently assesses \$4 million per year to address housing development/preservation and housing services, and the City also brings in an additional \$7 million per year with an affordable housing sales tax. These funds are used to

help support capital costs, rent and services for some federally funded projects, thus contributing to the matching requirements. The Housing Levy continues through the end of 2028. The needs, priorities and strategies of the Consolidated Plan are assisted by these additional resources in the community.

**If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The City has an analysis of underutilized land owned by the jurisdiction which is in play as we move forward with agency partnerships to implement the plan. Several of these parcels have been utilized for affordable housing in the past, and the City continues to look for additional strategic land acquisitions and creative partnerships to create future affordable housing opportunities.

**Discussion**

City funding for most housing projects typically includes other funds to complete a project. Nonprofit housing developers have been successful in obtaining Washington State Housing Trust Fund allocations and Low-Income Housing Tax Credit investments. The City's funding has been successful at leveraging significant non-federal sources.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
1	Reduce cost burden	2023	2027	Affordable Housing Homeless Non-Homeless Special Needs	Affordable Housing	HOME CDBG City Levy & ST	Rental units constructed Homeowner Housing Rehabilitated Direct Financial Assistance to Homebuyers Rental Units Rehabilitated
2	Provide vulnerable households with services to remain stably housed	2023	2027	Affordable Housing Homeless Non-Homeless Special Needs	Housing Services	HOME HOME-ARP CDBG City Levy & ST	Public service activities for Low/Moderate Income Housing Benefit Tenant-based rental assistance / Rapid Rehousing
3	Help vulnerable households to meet their basic needs (other than housing)	2023	2027	Homeless Non-Homeless Special Needs Non-Housing Community Development	Basic Needs	CDBG City GF	Public service activities other than Low/Moderate Income Housing Benefit

4	Increase safety for vulnerable populations	2023	2027	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Safe Shelter	HOME CDBG City Levy & ST City GF	Homeless Person Overnight Shelter Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit
5	Prevent housing discrimination and increase protections for low-income renters	2023	2027	Advocacy and Service Delivery	Fair Housing Education & Enforcement	HOME CDBG City Levy & ST City GF	Other

**Table 54 – Goals Summary**

**Goal Descriptions**

1	<b>Goal Name</b>	<b>Reduce cost burden</b>
	<b>Goal Description</b>	The greatest need in our community is to assist those with the lowest incomes with housing. The private market is unable to meet the demand for affordable housing units without assistance. The rise in housing costs, together with historically low vacancy rates and sluggish wage growth, makes it very difficult to find affordable housing. This goal includes the construction of new low-income rental housing, rehabilitation of owner-occupied and rental housing for low-income residents, and supporting down payment assistance and new homeownership opportunities.

2	<b>Goal Name</b>	<b>Provide vulnerable households with services to remain stably housed</b>
	<b>Goal Description</b>	Many households need more than a housing unit to maintain their housing stability. Support navigation programs for households vulnerable to homelessness, as well as rental assistance, case management, and homeless prevention and diversion programs.
3	<b>Goal Name</b>	<b>Help vulnerable households to meet their basic needs (other than housing)</b>
	<b>Goal Description</b>	Support the ability of households to address their non-housing basic needs and services such as through food security, childcare, literacy, violence-prevention, health and disability services, and senior assistance programs.
4	<b>Goal Name</b>	<b>Increase safety for vulnerable populations</b>
	<b>Goal Description</b>	Support day and nighttime assistance for very vulnerable populations including through the provision of shelter, behavioral health, hygiene and service day centers. Improve climate resiliency and disaster preparedness.

5

<b>Goal Name</b>	<b>Prevent housing discrimination and increase protections for low-income renters</b>
<b>Goal Description</b>	Education and administration funding. This includes public education on Fair Housing and housing issues, outreach to funding decision-makers and policymakers. This includes administration of all funding programs.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The 2023 Action Plan includes continuation of existing activities, renewal of ongoing activities, and new projects.

In 2022, the City solicited new proposals for public service activities with the intent to fund them for 2 years and will continue to fund these activities through 2023 provided adequate funds are allocated.

#### Projects

#	Project Name
1	Rental Housing Development & Acquisition
2	Owner-occupied rehab and repair
3	Rental Assistance & Housing Services
4	Human and Social Services
5	Public facilities and improvements
6	Homebuyer program
7	Planning and management

Table 55 – Project Information

#### Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The allocations selected for funding in the 2023 Action Plan were primarily based on solicitation of proposals which used the City's priorities identified in the prior Consolidated Plan, informed by existing realities. Priorities reflect the goals in the Consolidated Plan, as combined with the local capacity to deliver housing and services. Bellingham continues to need a drastic increase in the supply of housing as the vacancy rate hovers around 1%; there is simply not the capacity to deliver the number of units or the array and depth of services that are needed in the near term.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	Rental Housing Development & Acquisition
	<b>Target Area</b>	
	<b>Goals Supported</b>	Reduce Cost Burden
	<b>Needs Addressed</b>	Affordable housing
	<b>Funding</b>	CDBG HOME City Housing Levy & Sales Tax
	<b>Description</b>	Meeting the need of additional affordable rental housing.
	<b>Target Date</b>	5/1/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	60 new rental units are anticipated to be developed, and 11 existing units acquired, all serving low and very low-income households. In addition, a number of projects are underway from prior year commitments.
<b>Location Description</b>	Bellis Family Housing - Eliza & Bellis Fair Parkway Garden St Apartments - 1015 N Garden St Laurel & Forrest Senior Housing	

		Millworks Family Housing (Laurel & Cornwall)
	<b>Planned Activities</b>	<p>Bellis Family Housing is being developed by Opportunity Council with 60 units planned.</p> <p>Garden Street Apartments are being acquired by the YWCA as 11 units of homeless-on-entry housing.</p> <p>The Laurel &amp; Forrest Senior Housing Development is 56 units, 10% for homeless-on-entry, with a childcare center co-located in the building.</p> <p>The Millworks project is 80 units of family-sized housing, 20% of which are set aside for homeless-on-entry.</p>
2	<b>Project Name</b>	Owner-occupied rehab and repair
	<b>Target Area</b>	
	<b>Goals Supported</b>	Reduce Cost Burden
	<b>Needs Addressed</b>	Rehabilitation of existing units
	<b>Funding</b>	<p>CDBG</p> <p>City Housing Levy</p>
	<b>Description</b>	This is the City's Home Rehab Program, as well as a local levy-funded program for manufactured housing repairs.
	<b>Target Date</b>	6/30/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	18 households are estimated to benefit from the home rehab and manufactured housing repair programs this year; typical households are a mix of seniors, disabled, low, moderate, and very low income homeowners.
	<b>Location Description</b>	various
	<b>Planned Activities</b>	<p>This project consists of two activities:</p> <p>City of Bellingham Homeowner Rehabilitation Program - the City offers financial assistance to owner-occupied homes that need critical repairs to meet minimum housing standards (CDBG).</p> <p>Manufactured Home Repair Program - the City provides local housing levy funds to the Opportunity Council to repair and weatherize owner-occupied manufactured homes.</p>
<b>3</b>	<b>Project Name</b>	Rental Assistance & Housing Services
	<b>Target Area</b>	
	<b>Goals Supported</b>	Provide vulnerable households with services to remain stably housed
	<b>Needs Addressed</b>	Housing Services
	<b>Funding</b>	<p>HOME</p> <p>HOME-ARP</p> <p>City Housing Levy &amp; Sales Tax</p>

	<b>Description</b>	This is housing services support through housing navigation and outreach, PSH operations, rapid rehousing, case management, prevention and diversion services, and the TBRA program.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	60 households are projected to benefit from RRH and TBRA this year; they are typically a mix of families with children, households with disabilities, those who are homeless-on-entry, single-parent households, and singles. 102 households are expected to be assisted through 4 project-based programs: 22 North, Sun Community Services 2 PSH facilities, Francis Place, and Heart House. Many more households are benefited through outreach and navigation services.
	<b>Location Description</b>	various  Many services based out of the Homeless Service Center at 1111 Cornwall Ave.
	<b>Planned Activities</b>	Provide homeless outreach and housing navigation services; rental assistance to very low-income households through the coordinated entry and/or diversion services programs in the community; Services and rental assistance for project-based households in nonprofit-owned facilities.
<b>4</b>	<b>Project Name</b>	Human and Social Services
	<b>Target Area</b>	
	<b>Goals Supported</b>	Help vulnerable households to meet their basic needs

<b>Needs Addressed</b>	Basic needs
<b>Funding</b>	CDBG City GF
<b>Description</b>	This human and social service funding opportunity is limited to those services that meet one or more of the following goals: Increase access to affordable childcare; Increase economic security and reduce vulnerability; Increase access to mental health services; Increase access to basic needs (excluding housing); Promote integration and coordination between systems.
<b>Target Date</b>	6/30/2024
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 4,500 individuals are projected to be served through human and social services activities this year.
<b>Location Description</b>	Various
<b>Planned Activities</b>	Activities include mental health counseling (Lydia Place), Domestic Violence family support and education, childcare and early learning, meals on wheels, volunteer chore program, literacy education, trauma-informed case management for families who have experiences violence and trauma, food bank and meal supports, senior services, teen justice and mediation, vocational readiness, and mobile response to homeless or at risk of homelessness who are frequent users of emergency services (GRACE program).

5	<b>Project Name</b>	Community Facilities
	<b>Target Area</b>	
	<b>Goals Supported</b>	Help vulnerable households to meet their basic needs
	<b>Needs Addressed</b>	Basic needs
	<b>Funding</b>	CDBG City GF
	<b>Description</b>	Support the acquisition and development of childcare centers and other community facilities
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The proposed childcare acquisition will serve 122 children and increase of 24 children due to the move from an outdated facility. Other community facilities supported my serve adults with disabling conditions and/or health needs.
	<b>Location Description</b>	various
	<b>Planned Activities</b>	Support the YMCA to acquire a new site to replace and expand childcare in the Barkley neighborhood and support other identified community facility needs.
6	<b>Project Name</b>	Homebuyer Program

<b>Target Area</b>	
<b>Goals Supported</b>	Reduce Cost Burden
<b>Needs Addressed</b>	More affordable housing
<b>Funding</b>	HOME City Housing Levy
<b>Description</b>	This supports down payment assistance and homeownership development.
<b>Target Date</b>	6/30/2024
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	4 households are projected to benefit through the down payment assistance program. Additional households may benefit through new homeownership development in the early phases of planning.
<b>Location Description</b>	various
<b>Planned Activities</b>	Provide down payment assistance to reduce the capital needed for homeownership.

**AP-50 Geographic Distribution – 91.220(f)**

**Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The city’s Plan does not propose geographic priorities in this planning period. Our Assessment of Fair Housing did not reveal any racially or ethnically concentrated areas of poverty or areas which lack access to opportunity in the jurisdiction, and public comments emphasized that affordable housing is needed in all areas. With ever increasing property costs, formerly affordable neighborhoods are losing affordable housing stock to sales, redevelopment, and rental increases.

A strategy of this Action Plan is to promote mixed income neighborhoods throughout the jurisdiction.

**Geographic Distribution**

Target Area	Percentage of Funds

Table 56 - Geographic Distribution

**Rationale for the priorities for allocating investments geographically**

Investments will not be prioritized geographically.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	70
Non-Homeless	128
Special-Needs	6
Total	204

Table 57 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	45
The Production of New Units	136
Rehab of Existing Units	12
Acquisition of Existing Units	11
Total	204

Table 58 - One Year Goals for Affordable Housing by Support Type

#### Discussion

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

#### **Actions planned during the next year to address the needs to public housing**

The Authority plans to complete a comprehensive capital needs assessment to assess the remaining useful life of building systems, prioritize needs and explore financial resources to complete the work. The Authority will continue to manage and complete projects identified in its Capital Fund plan.

#### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

The Authority has resumed office hours at each high rise, and over the next year will work to resume educational trainings, social gatherings, planning meetings with staff and other opportunities for feedback and engagement.

#### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

N/A

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The Whatcom County Department of Health & Community Services (WHCS) is the lead agency for the homelessness strategy and continuum of care in our community. The City's plans support these strategies. In 2022-2023, the City and WHCS convened a group of stakeholders and local experts to identify a strategy for better assisting families with children who are at risk of homelessness or already homeless. The group prioritized several short-term activities, which are incorporated below.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

People who are homeless or at risk of becoming homeless enter the housing system and are assigned case management from an array of partnering, non-profit housing agencies. Housing counseling and advocacy become a significant part of the case management support provided. More general counseling and advocacy services are also available to low-income people at the Community Resource Center (drop-in service center) of the Opportunity Council which offers information and referral services to help people seeking a variety of services in addition to housing services.

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Bellingham has a variety of outreach services targeting the homeless population. Starting in 2015, the City funded a Homeless Outreach Team using 2012 Housing Levy funds; the City contracted with the Opportunity Council for these services. The City will continue to support the Homeless Outreach Team as the primary team responsible for helping engage those who are living unsheltered to make referrals and offer services. The City plans to continue funding outreach and case management activities in the 2023 Action Plan, and are working to increase funding to expand the Homeless Outreach Team's hours.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City's strategy on homelessness encourages rapid rehousing of those that are homeless and targeted prevention for those that are at risk of becoming homeless. The City supports existing emergency shelter and transitional housing in the community through the city's public (human) service grant program. Examples of programs funded by this grant program include:

- Larrabee Residence (YWCA)
- Recovery House (Opportunity Council)
- Transitional Living Program (Northwest Youth Services)

### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

Bellingham is seeking ways to partner with agencies to increase the number of beds available to persons

living unsheltered and continues have an open door to work with any qualified partner agencies who have the experience and desire to operate emergency shelter in our community. The existing low-barrier shelter operated by the Lighthouse Mission Ministries is developing a new building at a permanent location which will accommodate a higher number of individuals and some families. Unity Care Northwest and Opportunity Council have partnered to open The Waystation in 2023, which will provide respite care for recently discharged adults who are medically fragile and unhoused, as well as health and hygiene services.

In 2021, the City contracted with the Low-Income Housing Institute and Road2Home to open a tiny house village in response to an urgent need for more non-congregate shelter, especially for seniors and medically fragile individuals and couples. Gardenview village opened with 30 units and added 5 addition units in 2022, to serve up to 50 people. The village is staffed 24/7 and participating in housing case management is a mandatory.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

The community has long been a supporter of prevention as the most effective and cost-efficient method to address homelessness. Many local programs have a prevention component, and receive City funding for that reason. Some recently funded activities to help low-income individuals and families avoid becoming homeless include or increase resiliency include:

- Rapid Rehousing and Diversion Program (Opportunity Council)
- Carl Cozier Family Resource Center (Bellingham School District)
- Vocational Readiness Program (Northwest Youth Services)
- Parent-Teen Mediation Program (Whatcom Dispute Resolution Program)

## **Discussion**

As seen across the State, the number of homeless persons in Bellingham and Whatcom County continues to increase, as it has for the last few of years. Although the Covid-19 pandemic disrupted the annual census and added increased emergency resources to the community, in draw-down of those additional resources (like rent payment assistance) we expect to see the number of homeless households to rise even more steeply in the next year. Partner agencies are already reporting unprecedented demand. The City is working with partners to find creative new solutions to expand capacity and boost resources around prevention wherever possible.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

The City remains committed to removing or ameliorating the negative effects of public policies that serve as barriers to affordable housing. As discussed previously in section MA-40, the major barriers to affordable housing in the jurisdiction are driven by market forces: demand for housing exceeds supply, rents and property values are rising, and wages are not increasing proportionate to housing costs. As in many cities, the high percentage of single-family zoning relative to the total land area is quite high, leaving little variation of housing types outside of downtown and urban villages. Historic policy decisions related to neighborhood covenants, discriminatory financing, and single-family zoning have resulted in a disproportionately low percentage of homeowners who are non-White and Hispanic. Bellingham still sees the effects of these policies today.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

Bellingham has taken many steps since the previous Consolidated Plan to attempt to update zoning and incentivize a greater variety of housing options for residents of all incomes. One key strategy to keeping public costs down while increasing housing options is to build infill and multi-family housing in areas of the city which already have services and infrastructure. This includes passing an ADU ordinance and a project to increase capacity in Residential-Multifamily zones. Based on preliminary analysis of our buildable lands, utilizing ranged zoning and minimum densities in Residential Multi areas results in an overall increase of 20% in Bellingham's infill capacity. Within our developed areas, these incremental density increases through the ranged zoning system provide small-scale infill opportunities without requiring developers to purchase multiple adjacent properties. The project components aim not only to increase density, but to provide more opportunities for housing variety, affordability, and homeownership. Collectively, the project aims to support compact growth, a primary goal in both our Comprehensive Plan and Climate Action Plans.

In addition, this year's plan includes an explicit goal to increase Fair Housing education and enforcement, with intention of reducing discrimination. The City will also continue to work to inform lenders and households regarding Fair Housing laws, and in particular, to encourage greater participation by minorities and ethnic groups disproportionately represented in homeownership.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

After carefully considering public feedback, data, and the recommendations expressed by partners and stakeholders, the projects previously described in this Action Plan will address the priority need for affordable housing, basic needs, housing services, safe shelter, and Fair Housing education and enforcement. The other actions described below are included to the degree that they also contribute to meeting one of these needs.

### **Actions planned to address obstacles to meeting underserved needs**

Through the many community work groups with which the City is involved (including the Whatcom County Coalition to End Homelessness, Whatcom Housing Alliance, Healthy Whatcom, Child and Family Wellbeing Taskforce, Aging Well Whatcom, and the Families with Children Strategy group). The work of all these groups is in some way geared towards addressing obstacles to meeting underserved needs. The City will continue to engage and collaborate with our partners to identify and address obstacles as they arrive.

### **Actions planned to foster and maintain affordable housing**

Our highest priority goal is to reduce cost burden, which includes many actions intended to foster and maintain affordable housing. These include:

- Support the acquisition, preservation, and development of housing units affordable for low-income residents.
- Maintain the City's proactive role in affordable housing development.
- Support homeownership for low to moderate income households, especially for minority households and households with young children.
- Foster creative solutions for alternative ownership models, including through shared equity, resident-owned communities, and cooperative housing.
- Offer rental assistance for vulnerable households, prioritizing homeless families with children and medically fragile seniors, as well as severely cost burdened families with young children.
- Offer home rehabilitation loans with favorable terms for low-income homeowners – especially for those who are elderly or disabled.

### **Actions planned to reduce lead-based paint hazards**

Continue the Home Rehab Program, which includes lead-based paint suppression for high-risk homes. Staff will also continue outreach to childcare centers and other opportunities to spread information about the dangers of lead-based, and resources available for mitigating those risks.

### **Actions planned to reduce the number of poverty-level families**

Funding for programs that reduce the number of poverty-level families include literacy and job training services provided through the Whatcom Literacy Council and Opportunity Council. Other activities attempt to prevent families from falling further into poverty by providing basic needs and other supports such as through programs such as the Free Grocery Program, Childcare Tuition Assistance, and landlord/tenant mediation services through the Whatcom Dispute Resolution Center and Opportunity Council's Landlord Liaison program.

### **Actions planned to develop institutional structure**

New strategies adopted in this plan is to help build capacity and partnerships to increase shelter spaces, as well as to address system constraints that prevent the emergency housing system from working in the most supportive and efficient way possible. The city is currently working closely with WHCS to develop specific actions, collaborating with local service providers. One early step that the City is taking is to offer technical assistance to agencies that hope to increase their internal capacity.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

See sections SP-55, SP-60, and SP-70 for explanation of coordination between public and private housing agencies. Some of the actions recently prioritized by our stakeholders, and will be added to the Plan, are:

- To improve real-time data between funders and agencies to support proactive planning.
- Establish continuous check-ins between funders and community service providers

### **Discussion:**

Voters in the City of Bellingham approved a Low-income Housing Levy in 2012, and again in 2019. The City began implementation of this levy in 2013, using the needs and priorities identified in the Consolidated Plan as a baseline for this program. As a result of this levy passage, significant attention is being paid to addressing obstacles, affordable housing supply, institutional structure, and coordination. If this source of funding did not continue, there would be a significant reduction in the level of housing and services the city is able to support.

## **Program Specific Requirements**

### **AP-90 Program Specific Requirements – 91.220(I)(1,2,4)**

#### **Introduction:**

#### **Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan
3. The amount of surplus funds from urban renewal settlements
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.
5. The amount of income from float-funded activities
6. Total Program Income

#### **Other CDBG Requirements**

1. The amount of urgent need activities

#### **HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:
2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:
3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:
4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows: