



Photo credit: Dawn-Marie Hanrahan

CITY OF BELLINGHAM 2018-2022 ASSESSMENT OF FAIR HOUSING

Accepted by HUD December 13, 2017



U.S. Department of Housing and Urban Development

Northwest/Alaska Area
Office of Fair Housing and Equal Opportunity
Seattle HUB
Program Center
909 First Avenue, Suite 205
Seattle, WA 98104-1000

Ms. Samya Lutz
Housing & Services Program Manager
Planning & Community Development Department
210 Lottie Street
Bellingham, Washington 98225

December 13, 2017

Dear Ms. Samya Lutz,

Thank you for your support as HUD implements its Affirmatively Furthering Fair Housing (AFFH) rule and your efforts in completing an Assessment of Fair Housing (AFH). As you know, the AFH assists communities in identifying fair housing issues and opportunities and will help your jurisdiction make more informed community planning decisions.

We are pleased to inform you that the U.S. Department of Housing and Urban Development (HUD) has accepted your AFH (see 24 C.F.R. § 5.162(a)(2)).

Now that HUD has accepted your AFH, please be aware that the AFFH Final Rule provides that:

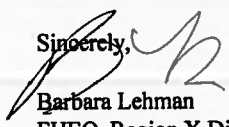
1. Your consolidated plans and annual action plans, and PHA Plans (including any plans incorporated therein), must include strategies and actions that implement the priorities and goals from the AFH that are intended to affirmatively further fair housing. Strategies and actions must affirmatively further fair housing and may include, but are not limited to, enhancing mobility strategies and encouraging development of new affordable housing in areas of opportunity, as well as place-based strategies to encourage community revitalization, including preservation of existing affordable housing, including HUD-assisted housing. (see § 5.154(d)(5)).
2. In addition, the AFH process is intended to inform other community plans including, but to limited to; education, transportation, or environmental related plans. For options and recommendations on how this may be accomplished, please see the AFFH Rule Guidebook.

HUD has many resources designed to support your AFFH efforts. You will find a portal for requesting AFFH technical assistance, fact sheets, and other useful AFFH resources at HUDExchange.info. Please reach out to your local HUD field office with any questions or to obtain technical assistance.

We look forward to working collaboratively with you during your 5-year planning cycle and appreciate your efforts to affirmatively furthering fair housing.

If you have any questions about this letter, please contact Barbara Lehman at Barbara.L.Lehman@hud.gov.

Sincerely,


Barbara Lehman
FHEO, Region X Director

I. COVER SHEET

CITY OF BELLINGHAM

Assessment ID 68

City of Bellingham 2018-2022 Assessment of Fair Housing

Program Participants

Participant ID 916001229

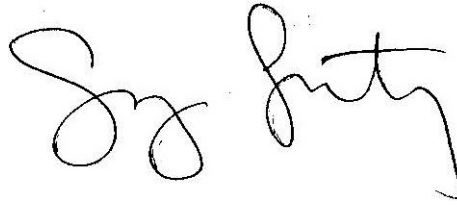
Lead - due 10/4/2017

1. Submission date: **October 23, 2017**
2. Submitter name: **Samya Lutz**
3. Type of submission: **Single Program Participant**
4. Type of program participant(s): **Consolidated Plan/Participating jurisdiction Participant**
5. For PHAs, Jurisdiction in which the program participant is located: **N/A**
6. Submitter members (if applicable): **N/A**
7. Sole or lead submitter contact information:
 - a. Name: **Samya Lutz**
 - b. Title: **Housing & Services Program Manager**
 - c. Department: **City of Bellingham, Planning & Community Development**
 - d. Street address: **210 Lottie Street**
 - e. City: **Bellingham**
 - f. State: **Washington**
 - g. Zip code: **98225**
8. Period covered by this assessment: **July 1, 2018 – June 30, 2023**
9. Initial, amended, or renewal AFH: **Initial AFH**
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;

11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a) (1), 91.325(a) (1), 91.425(a) (1), 570.487(b) (1), 570.601, 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

(Signature) (date)

 10/23/17

12. Departmental acceptance or non-acceptance:

(Signature) (date)

Comments

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II. EXECUTIVE SUMMARY

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

The City of Bellingham's Assessment of Fair Housing (AFH) process began in December 2016. Working closely with the Community Development Advisory Board, City staff developed a broad list of stakeholders and community organizations and finalized our Public Participation Plan in May 2018.

All stakeholders were kept informed throughout the process with a series of email communications and via a regularly updated website with links to relevant information, and a comment form to submit feedback. Stakeholders were also invited to reach out to City staff to arrange in-person meetings with any interested groups, committees, or neighborhood organizations. In June, the City released a Fair Housing survey in both English and Spanish, which was widely publicized on social media, local media outlets, and through printed posters and fliers. The survey yielded 1,700 complete responses. The demographics of the survey respondents were generally representative of Bellingham's demographics and had participation from all neighborhoods.

In addition to attending regularly scheduled meetings to provide updates to City Council, the Community Development Advisory Board, and the Whatcom County Coalition to End Homelessness, City staff also met in-person with three other local organizations or groups at their request. A Public Hearing was held on September 14th at City Hall, which was advertised in advance via a public notice in the Bellingham Herald, and an announcement was also made via the website and by email to the stakeholder distribution list. In general, the top concern of survey respondents, community stakeholders, and the public was primarily focused on issues of affordability and availability of housing options and lack of housing stock, as well as source of income discrimination. The public participation process is described in detail in Section III.

HUD provides data on seven Opportunity Indicators: Low Poverty, School Proficiency, Labor Market, Transit, Low Transportation Cost, Jobs Proximity Indices, and Environmental Health. The jurisdiction (Bellingham) compared to the region (Whatcom county) has better outcomes for all racial/ethnic groups for the School Proficiency, Labor Market, Transit, Low Transportation Cost, and Jobs Proximity Indices. The two indicators where the region scored higher than the jurisdiction for all groups were the Environmental Health Index (exposure to environmental toxins) and the Low Poverty Index, which are better for all groups in Whatcom County compared to Bellingham. The results of these indicators are discussed in detail in Section B.iii, "Disparities in access to opportunity."

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

- Hispanic households have the highest percentage of housing problems (cost burden¹, overcrowding, or substandard housing).
- White households have the lowest job proximity.
- Asian or Pacific Islander households have the highest transportation costs and lowest school proficiency.
- Native American households have the highest exposure to poverty.

Despite the generally positive indicators in comparison to the region, absence of racially or ethnically concentrated areas of poverty, and lack of segregation, there are still some reasons for concern regarding large families, Hispanic and Native American households, and concentrated areas of low-income households in specific neighborhoods. HUD data shows that 32.4% of family households with less than five people have housing problems, while 69.8% of large family households of more than five people have housing problems. Hispanic households have the highest rate of housing problems and severe housing problems compared to all other groups, both in the jurisdiction and the region. Across all Opportunity Indicators, Native American households below the federal poverty line score lowest on four out of seven indicators in the jurisdiction and 5 out of seven indicators in the region. And finally, we find that the same neighborhoods with the highest numbers of non-white students also have the highest percentages of low-income students.

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

- Lack of affordable, accessible housing in a range of unit sizes.
- Low vacancy rate.
- Private discrimination.
- Lack of local private fair housing outreach and enforcement.
- Displacement of residents due to economic pressures.
- Access to publicly supported housing for persons with disabilities.
- Lack of assistance for housing accessibility modifications.
- Community opposition.
- Land use zoning laws.
- Occupancy codes and restrictions.
- Impediments to mobility.
- Lack of assistance for transitioning from institutional settings to integrated housing.
- Lack of affordable in-home or community-based supportive services.
- Lack of public investment in specific neighborhoods, including services or amenities.

¹ Cost burden is defined as paying more than 30% of household income for housing. Severe cost burden is defined as paying more than 50%.

How each of these contributing factors is relevant in the jurisdiction is described in detail in Section VI. Although Bellingham has no segregation or racially/ethnically concentrated areas of poverty that meet HUD's threshold, the housing issues caused by these contributing factors are more likely to affect residents with limited incomes, minorities, and renters. Native American, Hispanic, and large family households are especially vulnerable because they have higher exposure to poverty and housing problems.

In order to affirmatively further fair housing in the context of the contributing factors identified, the following goals were developed and prioritized by the number of factors from the list above that would be addressed by each goal. The goals proposed are:

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

Goal #2: Examine where the City may want to surpass State and Federal laws in protecting additional classes of people who face housing discrimination.

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

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

Goal 1 seeks to change some of the current practices which contribute to a lack of diversity in current housing stock for households at all income levels. Currently, nearly 43% of Bellingham residents (and 55% of renters) are cost burdened. Housing affordability was a major point of concern for the community, and lack of affordable housing options limit mobility and housing choice. The limited areas with multi-family zoning also concentrates poverty in those areas.

The City's previous analysis of impediments to fair housing (2012-2017) identified a potential need to add additional categories of protected classes to Bellingham's municipal code, but the City lacked the political will and enforcement capacity at that time. Today's housing market is even tighter, with very limited affordable housing options, and there is renewed interest in pursuing every option available to provide protections for tenants, as indicated in Goal 2.

As with Goal 3, the previous analysis also identified the need for public education, which was carried out and well attended at that time. Still, feedback from our recent survey and public comments indicate that there continues to be confusion around Fair Housing Laws among both tenants and property owners, and a high degree of interest in updated information and trainings.

Related to the low vacancy rate, many renters who receive housing subsidies such as Section 8 vouchers are finding it increasingly difficult to obtain housing in the private market. We have already seen some early successes with a Landlord Liaison, who can work directly with property owners and try to expand the pool of available properties, and assist tenants who may have difficulty finding stable housing on their own. Landlords themselves have also suggested that having an intermediary who can provide coaching and support for tenants could help prevent problems that lead to eviction. Goal 4 will help to address these challenges.

Altogether, these goals will address the concerns identified by the community and help to overcome the contributing factors that limit housing choice and access to opportunity in Bellingham.

III. COMMUNITY PARTICIPATION PROCESS

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

Community participation plan:

A Community Participation Plan was finalized by City Staff and presented to the Community Development Advisory Board on June 16, 2017. The Plan outlined a timeline along with multiple tactics for fostering community participation and public comment. These tactics are:

- City Council meetings
- Community Development Advisory Board (CDAB) public hearings
- Emails to stakeholder list
- Meetings with stakeholder groups
- Webpage
- Online survey
- Hardcopy of survey
- Facebook and social media posts
- Press releases and media advertisement

Throughout the Assessment of Fair Housing (AFH) and Consolidated Planning process, City staff updated the City Council and CDAB as to the progress. In addition to the regular channels used by the City to notify the public of upcoming agendas and public hearings, the City created a dedicated web page where the public can get timely updates and read background information related to the AFH and the Consolidated Plan (www.cob.org/cpupdate). Emails were sent to a wide distribution group of stakeholders, including a link to the web page and describing other ways they could get involved. Beginning August 1, a comment form was added to this webpage where the public could submit comments directly to City staff regarding the Consolidated Plan and AFH.

Based on best practices from other grantees, City staff developed a Fair Housing Survey to get feedback on how the City is doing in upholding the Fair Housing Act and providing equal access to opportunity in Bellingham. The survey included four sections: housing, neighborhood satisfaction, discrimination, and demographics. The entire survey is included in Appendix A.

Survey outreach:

In order to get as wide a sample of Bellingham residents as possible, City staff utilized a variety of print, radio, and social media advertising to generate responses. On June 9th, an announcement and link to the survey was posted on the City's Facebook page and in the City employee newsletter.

The survey was also advertised under the events calendar of local radio station KGMI, and stations KPEG and KAFE were notified. Other social media outlets included the Whatcom Scanner Facebook page and Next Door. A 30-second spot promoting the survey also ran on Bellingham's community television station BC-TV from June 22 to July 31.

Printed postcards containing a link to the survey (and phone number to call to request a hardcopy) were brought to a June 12th at a Town Hall meeting on housing affordability in Bellingham, where 125 postcards were distributed. The public comments during this Town Hall meeting closely reflected what we heard in response to our Fair Housing survey.

To target the public, posters and postcards were also left at the following locations, and included a scan-able Quick Response Code linking directly to the survey:

- Bus stations
- Laundromats
- Libraries (City Center and Fairhaven)
- Local restaurants and coffee shops
- Shuksan Middle School Community Center
- Utility companies (Puget Sound Energy, Cascade Gas)
- Whatcom County Courthouse waiting area

To further spread the word about the Fair Housing Survey, all Planning & Community Development Department staff were asked to add a link to the survey to their email signature line while the survey was active.

Reaching underrepresented groups:

To make the Fair Housing Survey accessible to persons with limited English proficiency, the survey was translated into Spanish using a professional translation service, and made available using the same link as the English language version. Everywhere the survey was advertised (on postcards, posters, Facebook and the City's website), notification was also included in Spanish that the survey was available in Spanish, and that language assistance was available upon request: "También se ofrece esta encuesta en Español. Comuníquese con Kate Bartholomew (kebartholomew@cob.org o 360-778-8353) si necesita documentos en otros idiomas o servicios de traducción." ["This survey is also available in Spanish. Communicate with Kate Bartholomew (kebartholomew@cob.org or 360-778-8353) if you need documents in other languages or translation services."]

City staff purposely targeted organizations that serve a large Spanish-speaking population in Bellingham, including Villa Santa Fe (housing for farmworkers and their families), Sea Mar healthcare, Goodwill's programs for English language learners, and The Arc of Whatcom County's Latino Community Coordinator.

In order to target other underrepresented groups (such as the homeless or formerly homeless, elderly, English language learners, and persons with disabilities) posters and postcards with a link to the survey were distributed at the following locations:

- Bellingham/Whatcom County Housing Authority
- LAW advocates (free legal assistance to low-income residents)

- Lydia Place (emergency and transitional housing for homeless families)
- Sea Mar health clinic waiting area
- Sterling senior housing
- Unity Care clinic waiting area
- Project Homeless Connect's July 21st free service event for homeless folks in Bellingham/Whatcom County

In addition, printed copies of the survey were dropped off and picked up at Francis Place housing for the disabled and formerly homeless, Opportunity Council's homeless housing center, and Whatcom County Senior Center. Two citizens called the number provided and asked for a printed copy of the survey, and it was mailed to them.

Public meetings:

City staff gave an update at CDAB meetings on January 12, 2017, June 8, 2017, and July 13, 2017. In addition, the Mayor and City Council were updated by City staff at regular council meetings on March 27, 2017, May 5, 2017 and July 10, 2017.

City staff also met individually with the following stakeholder groups during the AFH process to discuss and gather public feedback:

- Whatcom Coalition to End Homelessness, Steering Committee and Regular meetings (winter 2016, spring/summer 2017)
- Whatcom Housing Advisory Committee (summer 2017)
- Homeless Voices subcommittee (June 20, 2017)
- Lincoln Square public housing meeting – open to all PHA residents (September 7, 2017)

A public hearing was scheduled for September 14, 2017 from 6:00-8:00 pm during the CDAB meeting. All public comments are summarized in Section III.3 under "Other public comment".

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

City staff created an extensive list of stakeholders for regular communication during the Assessment of Fair Housing. These stakeholders were divided into three groups based on the different type of engagement expected during the AFH process. These groups were:

Group 1: Community stakeholders that work closely with issues related to housing. This group also includes members of the Community Development Advisory Board, the Mayor's Community Solutions Workgroup on the continuum of housing, and the Homeless Coordination Committee, which includes emergency service providers (police, fire, and EMS), as well as public works. City staff engaged with members of this group throughout the AFH to dialogue regarding strategy, goals, and objectives.

- Bellingham Housing Authority
- Chuckanut Health Foundation (philanthropic community)
- City emergency service providers (police, fire, EMS)
- City Public Works (land & water mgmt. agencies)
- Community Development Advisory Board members
- Community Voices
- Domestic Violence Sexual Assault Services

- Downtown Bellingham Association
- Lydia's Place
- Northwest Youth Services
- Northwest Youth Services
- Opportunity Council
- Resident Action Project
- Resident beneficiary
- Technology Advisory Group (broadband internet providers)
- Whatcom County Council to End Homelessness
- Whatcom County Housing Advisory Committee
- Whatcom County Public Health Department

Group 2: Community partners that work directly with stakeholders and clients. This group of stakeholders included partners that provide housing and other services, and may have access to members of the community that are directly affected by fair housing issues. City staff engaged with this group to help us conduct outreach and distribute hardcopies of the AFH survey.

- Bellingham Childcare & Learning Center
- Bellingham Food Bank
- Bellingham Public Library
- Bellingham Tenants Union
- Brigid Collins Family Support Center
- Catholic Housing/Community Services
- Center for Independence (North Sound)
- Community-2-Community Development (C2C)
- Compass Health
- Goodwill
- Hearing, Speech and Deaf Center (North Sound)
- Interfaith Coalition
- Kulshan Community Land Trust
- Lake Whatcom Residential and Treatment Center
- LAW Advocates
- Lighthouse Mission Ministries
- Max Higbee Center
- Mercy Housing Northwest
- NAMI Whatcom
- North Sound Mental Health
- Northwest Regional Council
- PeaceHealth
- Pioneer Human Services
- Rainbow Recovery Center
- Rebound of Whatcom County
- Salvation Army
- SeaMar Community Health

- Sean Humphrey House
- SUN Community Services
- The Arc of Whatcom County (Latino Community Coordinator)
- Unity Care Northwest
- Volunteer Center of Whatcom County
- Whatcom Alliance for Health Advancement
- Whatcom Council on Aging
- Whatcom Dispute Resolution Center
- Whatcom Early Learning Alliance
- Whatcom Family and Community Network
- Whatcom Literacy Council
- Young Men's Christian Association (YMCA)
- Young Women's Christian Association (YWCA)

Public housing:

- Bellingham Housing Authority Properties
- Opportunity Council Properties
- Catholic Housing Services Properties
- Habitat for Humanity
- City Gate Apartments
- DVSAS Safe Shelter
- Greggie's House
- I Street Apartments
- Larrabee Residence
- Lydia Place Transitional Housing
- Sterling Senior
- Varsity Village
- Washington Grocery Building

Group 3: Community members at large. This group of stakeholders consisted of other members of the public who have a broad reach within Bellingham. Members include educational institutions, tribes, and the business community. This list also included representatives from each neighborhood advisory committee/neighborhood association. City staff engaged with this group to ask for public comment and help to spread the word about the AFH survey, and notify them about the Consolidated Plan Updates webpage.

- Association of Realtors
- Bellingham School District
- Bellingham Technical College
- Bellingham/Whatcom Chamber of Commerce
- Building Industry Association
- City and County Employees
- DSHS
- HOME Consortium of Skagit, Island, and Whatcom counties
- Lummi Nation

- Nooksack Indian Tribe
- Northwest Indian College
- NW Workforce Development Council
- Small Business Development Center
- United Way
- Western Washington University
- Whatcom Community College
- Whatcom Community Foundation
- Whatcom County Health Department
- Whatcom Transportation Authority
- WorkSource Whatcom

Neighborhood associations:

- Alabama Hill Mayor's Neighborhood Advisory Committee (MNAC)
- Barkley MNAC
- Barkely Neighborhood President
- Birchwood MNAC
- Birchwood MNAC
- Central Business District MNAC
- Columbia MNAC
- Columbia Neighborhood President
- Cordata MNAC
- Cordata Neighborhood President
- Cornwall MNAC
- Cornwall Neighborhood President
- Edgemoor MNAC
- Edgemoor Neighborhood President
- Fairhaven MNAC
- Fairhaven Neighborhood President
- Happy Valley MNAC
- Happy Valley Neighborhood President
- King Mountain MNAC
- Lettered Streets MNAC
- Lettered Streets Neighborhood President
- Puget MNAC
- Roosevelt MNAC
- Roosevelt Neighborhood President
- Samish MNAC
- Samish Neighborhood President
- Sehome MNAC
- Sehome Neighborhood President
- Silver Beach Neighborhood President
- Silver Beach MNAC
- South MNAC

- South Neighborhood President
- South Hill MNAC
- South Hill Neighborhood President
- Sunnyland MNAC
- Whatcom Falls MNAC
- Whatcom Falls Neighborhood President
- York MNAC
- York Neighborhood President

An email was sent to a total of 170 unique recipients in all three groups on June 14 or 15, 2017. The email 1) alerted stakeholders to the Assessment of Fair Housing and upcoming Consolidated Planning process and timelines, 2) announced the launch of the online AFH survey, and asked all organizations to share the link with their members via (an attached) printed flier and/or internal newsletter, and 3) offered for City staff to come attend their regularly scheduled group meetings to discuss the AFH and gather feedback in person. The email also included a link to the Consolidated Plan updates page (www.cob.org/cpupdate).

A follow-up email was sent to all stakeholder groups on July 27, 2017. This email was a reminder that the online survey would be closing shortly, and also that City staff were available to meet with groups in person.

3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

The public participation efforts were very successful. The AFH survey was open from June 9 to July 31, 2017. There were 2,060 total responses, of which 1,700 were complete. Seven responses were submitted in hardcopy, and the remainder were submitted online via Survey Monkey.

Six responses were submitted in Spanish, but only two of the six Spanish survey respondents were complete. The remainder were submitted in English.

The survey respondents are generally representative of Bellingham's overall demographics.

- There were respondents from every neighborhood in Bellingham (between 6 and 130 respondents per neighborhood). Twenty-two percent (375) of respondents live outside the City limits. (Those living outside the City were excluded for some questions but not for questions related to discrimination, since respondents might have faced discrimination within Bellingham but may be currently living in a nearby area).
- 40% of respondents own their home and 56% rent. Eleven respondents are homeless.
- Racial and ethnic makeup of respondents is close to Bellingham's city-wide demographics: 79% of respondents are white, 6% are multi-racial, 1.5% are Native American or Alaska Native, 1.2% are Black/African American, and 1% are Asian. 8.6% prefer not to identify their race. (Asians were the only racial group underrepresented compared to most recent ACS data.)
- 12% of respondents have a member of the household who is Hispanic or Latino.
- 21% of respondents have one member of their household who is disabled.
- Most people live in either a 2-person (38%) or 3-person (21%) household. Bellingham's average household size according to the most recent Census is 2.18.

- Median household income of respondents is \$50,000 (just a bit above the median household income according to the 2011-2015 ACS estimates).

The Homeless Voices subcommittee, hosted by the Opportunity Council, requested an in-person meeting. City staff met with this group for one hour on June 20, 2017. A presentation was given about the background of the AFH, Bellingham's demographics, and preliminary results of the AFH survey, followed by an open discussion.

A similar presentation was given at Washington Square and Lincoln Square public housing facilities, with a total of 10 participants. There were five members of the public in attendance at the Public Hearing.

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

Fair housing survey

The most common response to the question, *"Is there anywhere in Bellingham you do not feel welcome to live? Where and why?"* was "No," indicating that most respondents feel they are welcome to live anywhere in Bellingham (n=378, 48%). The second most common response was that respondents felt unwelcome in high-income neighborhoods, such as Edgemoor, South Hill, or Fairhaven because they are "not rich" or cannot afford to live there. Forty-one respondents said they felt unwelcome because they were low-income or had Section 8 vouchers, 15 said they felt unwelcome because they have pets or emotional support animals, and 11 respondents said they did not feel welcome because of their political affiliation. Six people mentioned they felt unwelcome somewhere because of their race, or because they are "not white."

Much of this discrimination described in response to our survey was against a non-protected class (even though the survey did include a legal definition of housing discrimination on the same page), such as low income or source of income, students, poor credit, pet ownership, or political affiliation, which are not protected by the Fair Housing Act or Washington State laws. Below are some examples responses by non-protected groups.

- "[I do not feel welcome] MANY places because the prices of housing are RIDICULOUS! I am an honest mother of 3 who works 40+ hrs a week and I BARELY scrape by providing for my family."
- "I have a criminal record so a property manager or any background check eliminates me. I have paid my dues to society but I have a scarlet letter. Public low income housing is also unavailable to me. My housing & job options are very very slim. I am also disabled."
- "Disability income is only \$600 a month. Affordable housing is non-existent."
- "Actually, I feel pretty unwelcome in most of Bellingham because I am a conservative."

While these viewpoints were valued, we have not addressed them into our Assessment of Fair Housing goals because they do not meet the legal criteria for housing discrimination.

There were some reports of discrimination against a legally protected class such as age, disability, and marital/family status. Some examples include:

- "Would not rent to me because they believed a person my age should own their own home."
- "My service animal was not allowed."
- "We were asked at one prospective rental if (my wife) was Lummi." [Native American]

- “My boyfriend and I both stable, work full time and are lucky to afford many places but no one takes chances on us because we're young and not married. We are unwelcome lots of places because of this.”
- “Our current landlord is not renewing our lease due to noise complaints. My son has severe autism and is non-verbal. His involuntary vocalizations are not acceptable to the other residents.”
- “Two separate property owners didn’t want a single mother - one said they didn’t think I could cut the grass and maintain (the average) lawn. The other owner chose someone with pets over me and made me feel inferior being a single woman.”

Comparing those who reported that they have faced housing discrimination² (n=272) to those who have not (n=1,010), we find the following significant³ differences among our survey respondent population:

- A significantly higher proportion are renters: 75% of those who reported facing housing discrimination rent their home. 18% of those who reported facing housing discrimination currently own their home.
- A significantly higher proportion are receiving government assistance: 35% of those who reported facing housing discrimination are receiving some kind of government assistance, compared to 15% of those who did not report facing housing discrimination.
- A significantly higher proportion are disabled: 32% who reported facing housing discrimination have one member of the household who is considered disabled, compared to 18% among those who did not report facing housing discrimination.
- A significantly higher proportion are Hispanic: 16% of those who reported facing housing discrimination have a member of the household who is Hispanic, compared to 10% of those who did not report facing housing discrimination.
- A significantly higher proportion are female heads of household: 60% of those who reported facing housing discrimination were a female head of household, compared to 48% of those who did not report facing housing discrimination.
- A significantly higher proportion are Native American or Multi-racial: Almost 2% of those who reported facing housing discrimination identified as Native American or Alaska Native, compared to 0.3% of those who reported no housing discrimination. 9% of those reporting housing discrimination identified as Multi-racial, compared to 5% who did not. Those who reported discrimination are significantly *less* likely to be White: 73% who reported facing housing discrimination identified their race as White, compared to 82% who did not report housing discrimination. For all other races/ethnicities, there was no significant difference between the two groups.

Of those who said they had experienced housing discrimination or did not know, 93% said the discrimination was not reported. The most common reason for not reporting discrimination was that the respondent doesn’t believe it makes any difference (66%) and the second most common reason was that the respondent doesn’t know where to report discrimination (41%).

In response to the question, “*has any hate crime been committed in your neighborhood or community in the last 3 years?*”, 69% of respondents did not know, 21% said no, and 10% said

² Note that these are all self-reported cases of perceived discrimination, including those which may not be covered by the Fair Housing Act or other existing laws.

³ In all cases reported here, “significant” means a statistical significance at the 95% confidence level (where $p = .05$)

yes. Of the different types of hate crimes, the most common were because of race, color, gender identity, or sexual orientation.

City Center had a disproportionately high rate of reported hate crimes, with 46% (n=12) respondents reporting that yes, there had been a hate crime committed in the last three years. Roosevelt and Birchwood neighborhoods had the next highest rates reporting a hate crime with 17% (n=14) and 13.5% (n=17), respectively.

In response to the open-ended question, *“Is there anything else about Fair Housing or housing choice in Bellingham that you would like to tell us?”* there were 515 responses.

Of these responses, the most frequent comment by far was regarding the affordability of housing (n=254, 49%). This is consistent with data that shows that many Bellingham residents are cost burdened or severely cost burdened.

Overall, the most common themes were:

- Rents have risen too much, too fast. We need rent control and/or rent caps.
- Housing costs are too high. This affects everyone regardless of household income, religion, race, etc.
- Working families, even those making middle incomes, cannot afford housing in Bellingham. Low-income and middle-income families are being pushed out.
- We need to do more to help the homeless.
- It seems like all the help is reserved for the homeless, elderly, or extremely low income.
- Cost of housing is disproportionate to wages. Create better paying jobs.
- Families cannot compete with college students for housing because they have the ability to (collectively) pay more for rent.
- Property management companies take advantage of students.
- Property owners and property management companies won't take Section 8 vouchers.
- There is no protection for being evicted for no just cause except economic gain. Low-income and those on Section 8 vouchers fear they will be evicted if they complain about maintenance issues.
- Landlords and property owners need education on what constitutes discrimination. Tenants also need education on how to maintain their housing.
- The City should allow ADUs and some multifamily units in single-family neighborhoods.

Low income is not a protected classes under the Fair Housing Act; however, the availability and accessibility of affordable housing are critical to an inclusive and economically diverse community. The feedback focused on housing affordability has been taken into account when selecting our goals, but will mainly be addressed through separate actions that the City is taking related to these issues which are outside of the scope of the Assessment of Fair Housing.

Meetings:

- Whatcom Coalition to End Homelessness, Steering Committee and Regular meetings (winter 2016, spring/summer 2017)
- Whatcom Housing Advisory Committee (summer 2017)
- Homeless Voices subcommittee (June 20, 2017)
- Lincoln Square public housing meeting – open to all PHA residents (September 7, 2017)
- Washington Square residents meeting (October 11, 2017)

Other Public Comments

Over the course of the 30-day public comment period on the draft AFH from September 18 to October 16, 2017, staff received one additional email, one phone call, and one comment submitted through the online web form. Responses to these and all other public comments are summarized at the end of this section. Other comments were received before the draft AFH was published, and these were taken into account while drafting the AFH goals.

Emails:

On July 20, 2017, City staff received an email from a citizen encouraging the City to include Microenterprise Assistance activities in the next consolidated plan, especially urban food production.

On July 27, 2017, City staff received an email from a citizen and member of the business community about the Fair Housing survey. He commented that the survey was great, but is hopeful that in the future the City will do another survey more specifically on fair housing, as the term “fair housing” can be misleading and seems it should include issues of affordability as well.

On October 12, 2017, City staff received an email from a citizen who is a graduate student at Western Washington University. She wrote to express her concerns about the difficulty which students face in finding affordable housing in Bellingham, and how the high cost of housing impacts the amount of student debt they accrue. Since Bellingham is home to a public state university, a community college and a technical college, she expressed her disappointment that college students did not receive more consideration in the draft report, and asked that more specific consideration be given to students in the final AFH.

Facebook:

On July 25, 2017, a citizen commented in a post to Mayor Linville, “I completed the COB fair housing survey online. I'd like to thank you and the City for the opportunity to lend my thoughts on this important issue. I feel it's one of the most vital issues facing our city in the coming years, and it will need to be addressed from a lot of different angles. So thank you.”

Phone calls:

On July 30 City staff received a phone call from a citizen who is a senior experiencing homelessness. After having worked for 47 years, this individual lost her housing after there was damage from flooding and it became unsafe. She could not find a new place to live on her social security income. She wished to share three comments: 1) we should change WA state law to allow rent control, 2) there should not be a lottery system for public housing, as this creates a lot of chaos and stress for those on the waiting list, and 3) to discourage the City's support of the Lighthouse Mission's low-barrier shelter. She feels it helps people who are “drug addicts, sex offenders, alcoholics, and people who have had run-ins with the law,” and that it is very dangerous for “seniors, families, and everyday people.” After going to the Opportunity Council for assistance, she was disappointed to find that “they could not help her since she was a law-abiding citizen” without addiction issues.

On October 13, 2017, City staff received a phone call from a citizen who came across a flier for the AFH survey (now closed), who was wondering what barriers we had found with the survey and if she could submit a public comment. She is a Section 8 housing recipient, and feels that communication with the Bellingham Housing Authority is a huge barrier to fair housing. She said that there is usually no receptionist on duty, and that “9 out of 10 times” her calls to BHA are not

answered, and it is difficult to reach the person you are trying to get through to if you don't know how to spell their name, and "that's what receptionists are for." She also said that BHA publishes information, and referred specifically to Form 1190 and Form 1175, one or both of which she said specifies that landlords need to give tenants 60 days of notice before a rent increase. She said that she and others in the community are not receiving 60 days of notice of increases, meaning that the Housing Authority itself is not complying with its own rules.

Web comment form:

On August 30, City staff received the following comment via our webpage's comment form:

From your data sheets: "The City's zoning laws presently prohibit more than three unrelated individuals to rent a home in a single-family neighborhood. This restriction, in contrast to the available housing stock and the needs of the population, may further contribute to the shortage of available places for rent to single individuals." Since the law is universally ignored and has never been enforced by the city, how can the city say that the law contributes to the shortage?

On September 23, City staff received the following comment via our webpage's comment form:

I would like to comment specifically on the theme that arose from the survey responses of property management companies taking advantage of students. Having rented both as a student and now as a young professional, I would say that this is consistent with my own experience. I have had multiple property management companies try to take advantage of my roommates and me, only to change their tune the moment we made it known that we knew what our rights are, and what recourse we had should our requests not be followed. (Most of these issues have arisen when minimal maintenance requests - such as pest control and broken furnaces - were not being taken care of, as well as property management companies attempting to withhold our security deposits without cause.) I feel that educating students on their rights as renters would be very valuable, as this was never provided to my previous roommates and me - we learned everything we knew about our rights from Google, which not every student would think to do. I am aware that Western Washington University has resources available on their website, but I feel that a more proactive approach would work better - they need to know the resources exist, how to access the resources, and what they can do if their property managers are trying to take advantage of them.

Public hearing:

Members of the public attended a public hearing at the September 14th Community Development Advisory Board (CDAB) meeting. A public comment period was held following a staff presentation on the draft AFH. There were five members of the public in attendance, and three who had a comment or question, as follows:

Question: What if there is not enough money for the proposed activities (education, enforcement, etc.)? Does it go to the public for a vote?

- The board clarified that this a policy guidance document and doesn't commit the City to expending funds. Budgets must be approved by the Mayor and City Council.

Comment: As a long-time renter, even as a straight white male and not being part of a well-known protected group, one resident reported he had experienced discrimination. If someone has a complaint, it is not always clear where one can go for help. After doing research, he realized that the State already has some robust landlord-tenant laws, and has had to remind landlords of these on several occasions.

- The Board responded that these are important points for consideration: there is a need for ongoing education. Part of the goals of the education should be not just about Fair Housing Law, but about the Residential Landlord-Tenant Act as well. Also, how do we know if our community education is effective? The milestones proposed just measure whether or not an activity took place, but is there a way we can measure effectiveness? Is there a different process we should be doing that would be more effective?

Comment: As a landlord with two units, the attendee voiced concern that she may not be able to choose tenants based on their rental history or references, and worried she could be accused of discrimination against a protected class even if she did not choose a renter because of another valid reason. She was also concerned that a rental cap (rent control) would incentivize landlords like her to immediately raise rent to the maximum allowable percentage rent increase every year.

- The Board explained that rental history is a legitimate way to screen applicants, and that landlords who live on-site and have four or less units are exempt from Fair Housing law. Also, State law would have to change in order for a rent control to be legal in Bellingham. These concerns add evidence to the need for more landlord education, as many of these laws can be confusing.

Written comment: before the meeting began, a letter from the 800-member Whatcom County Association of Realtors was submitted to board members and staff. The letter stressed the extent of the housing affordability crisis in Bellingham, and addressed the potential source of income discrimination legislation as well as the potential change to the City's definition of "family" (as it pertains to single-family zoning) which currently defines a family as no more than three unrelated individuals living in a single housing unit. The association's letter pointed out that housing vouchers are often not enough to cover the real costs of the units available on the market, and initial move-in costs are also prohibitive to low-income renters. The association also advises that the current definition of family places realtors in a dilemma between upholding the Fair Housing Act (which prohibits inquiring about potential occupants' marital or family status) and compliance with City of Bellingham zoning codes. Therefore, the association supports changing the current definition of family in a manner that is in accordance with Fair Housing practices.

- The board acknowledged the letter and added a discussion of the family definition and what CDAB can do to influence change to a future agenda item.

Response to public comments

In response to the comment regarding student renters being taken advantage of, a new milestone was added to Goal #3, which specifies that the City will work collaboratively with institutions of higher education to ensure that information regarding Fair Housing laws and tenants' rights are disseminated to students.

Regarding the letter dealing with the City's definition of family for zoning purposes, the suggestion supported by the Association of Realtors is already included within the first milestone of Goal #1. Its connection to the contributing factor of occupancy codes and restrictions is also addressed in Section VI.

The web form comment that asks about the City's lack of enforcement of "the City's zoning laws" regarding single-family as posted on the City's website revealed an error on the fact sheet as written: the single-family zoning is in fact only a definition within municipal code, not a law. Upon receiving a complaint, the City can ask landlords to comply with the zoning definition, and future non-compliance can result in a misdemeanor fine. The fact sheet will be corrected to clarify.

Comments not accepted:

The issue of Section 8 vouchers, whose value is not adequate to obtain rental housing at market prices, is outside of the City's control since those rates are set by HUD.

Regarding communication and policies of the Whatcom/Bellingham Housing Authority: we will pass along the complaint about difficulty of reaching the BHA by phone to the authority, but it is not within the scope of the AFH.

The comments regarding services for people experiencing homelessness and the suggestion of including microenterprise assistance both fall within the domain of the Consolidated Plan, and those comments will be incorporated, once it is drafted. Likewise, the suggestion about allowing for public input on issues of housing affordability and consideration for the high cost of housing for Bellingham's college students are to be more adequately addressed within the Consolidated Plan's public participation process.

IV. ASSESSMENT OF PAST GOALS, ACTIONS AND STRATEGIES

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

a. Discuss what progress was made toward their achievement;

In November 2012, the City of Bellingham conducted a review and analysis of demographic, income, housing and employment data, and an evaluation of the fair housing complaints filed in our jurisdiction in order to identify roadblocks and impediments affecting fair housing. The City then had a discussion of impediments in 1) the sale or rental of housing, 2) provision of brokerage services, 3) financing, 4) public policies, and 5) administrative policies for housing and community development activities that affect housing choice for minorities, if any. Metrics and Milestones were not used when preparing this document.

This Analysis of Impediments (AI) identified several impediments to fair housing choice in Bellingham, and City staff identified the following goals to address the impediments to Fair Housing in Bellingham.

1. Maintain, and expand as feasible, fair housing education and outreach efforts.
2. Target homeownership and lending marketing to African American, Native American, Hawaiian/Pacific Islander, and Hispanic households.
3. Consider policies that encourage inclusion of individuals covered by protected classes under Federal and State fair housing laws.
4. Develop a Fair-Housing Action Plan

The following actions have been taken to make progress towards the achievement of these four goals.

Goal #1, Fair housing education and outreach efforts:

The City of Bellingham used various strategies to promote Fair Housing education in Bellingham. We distributed information packets directly to Landlords and Property Management Companies. We held a local Fair Housing workshop, providing a speaker from the Fair Housing Center of Washington. We invited property owners and managers of apartment buildings to attend a presentation on March 7, 2013. The room holds 120 people, and although participants were not counted, when reviewing video of this event it appears to be at capacity (standing room only).

Posters and handouts were distributed to educate the public about fair housing, and translated into Spanish and Russian, languages common to the area. The City provided fair housing training to human service agencies and providers of transitional housing, as well as to elected officials at a City Council meeting in conjunction with the Fair Housing Center of Washington. Lauren Walker, the Executive Director of the Fair Housing Center of Washington, made a presentation to City Council on March 25, 2013.

Goal # 2, Target Homeownership and lending marketing to African Americans, Native American, Hawaiian/Pacific Islander, and Hispanic households:

Working with local agencies, the City of Bellingham determined the racial/ethnic characteristics of the current tenants and residents in the selected neighborhoods. Based on this analysis, the City concluded that persons who are not likely to apply for our Housing Rehabilitation or our

Homebuyer Program without special outreach are Southeast Asians, Hispanics, African Americans, and Native Americans.

Based on our identification of these groups, the City of Bellingham targeted marketing information on these City programs as well as sending Fair Housing Educational Information to the following local agencies and organizations whose memberships are primarily among those groups requiring special outreach:

Native Americans: Lummi Indian Housing Authority
2616 Kwina Road
Bellingham WA 98226

and

Nooksack Indian Housing
3891 Uluquance Drive
Deming WA 98244

Asians: Assumption Church
2116 Cornwall Avenue
Bellingham WA 98225

Hispanics: Lynden Community Center
401 Grover Street
Lynden WA 98264

and

Sea Mar Community Health Centers
800 E. Chestnut
Bellingham WA 98225

African Americans: NAACP
Old Main #375
Western Washington University
Bellingham, Washington 98225-9023

Goal #3. Consider policies that encourage inclusion of individuals covered by protected classes under Federal and State fair housing laws:

A review of current housing and human services strategies demonstrates Bellingham's commitment to maximize community benefit from limited and declining federal CDBG resources. It recommended that the City of Bellingham:

- A. Discussed adding the additional protected classes of creed, sexual orientation (and gender identity), Veterans (and Military status), use of guide dog or service animal and retaliation, which are listed in the Washington's Law Against Discrimination, to Bellingham's Fair Housing Policy.
- B. Consider land use policy revision to ensure a mechanism for requesting reasonable accommodations and include opportunities to publicize the new provisions

- C. Carefully consider the costs and benefits to low-income individuals of land use and zoning policies in order to proactively and affirmatively further fair housing in Bellingham.

Goal #4, Develop a Fair-Housing Action Plan:

City staff developed the Fair Housing Action plan for years 2013-2017 containing plans and periods, derived from the recommendations contained in the AI prepared in November 2012, and carried out each year to accomplish our goals.

b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences);

Working with the City of Bellingham's 2013-2017 Fair Housing Action Plan, we made much progress towards the City's goals.

To accomplish Goal #1, we developed fair housing educational programs for Housing and Human Services agencies and staff who serve protected classes; especially families, people of color and persons with disabilities. We contracted with the Fair Housing Center of Washington to initiate testing of housing providers to measure their willingness to make reasonable accommodations for prospective disabled residents. We held a local fair housing workshop, inviting property managers to participate, and provided a speaker from the Fair Housing Center of Washington. City staff distributed information packets directly to property owners and property management companies with information on fair housing and reasonable accommodations.

For Goal #2, we worked towards raising the lending community's awareness about the applications of fair housing law to homeownership. The aim was to encourage the involvement of banks and mortgage lending companies in furthering fair housing practices. Staff provided fair housing information and educational packets on predatory lending to local banks, mortgage companies, and real estate agencies. Staff also provided fair housing information to local homebuyer programs to educate people seeking to own their first home about their right to receive fair and unbiased treatment. We provided educational information to lenders and agencies that provide homebuyer assistance to market programs to people of color.

The City also worked to educate the public at large of protected classes, fair housing laws, and the resources available to them. City staff provided fair housing training for property owners, managers and staff to insure equal treatment of potential tenants. The City of Bellingham provided training on filing complaints with the HUD and the Washington State human Rights Commission as well as the Fair Housing Center of Washington. Our hope was to correct the seeming discrepancy between community input indicating discrimination against families with children and the lack of familial status complaints filed.

Staff distributed posters and handouts provided by HUD (including versions in Spanish and Russian) to educate the public about fair housing. We maintain an internet website (<https://www.cob.org/services/housing/pages/fair-housing.aspx>) that provides current information for citizens about fair housing practices. We also provide human service and temporary shelter providers with fair housing educational brochures to post in their waiting rooms.

For Goal #3, although City staff worked hard to achieve all our fair housing goals, we have a very small staff with which to accomplish all that we wanted to accomplish. We discussed changing the legislation for additional protected classes, but there was neither staff capacity nor political will sufficient to make the change at that time.

The Action Plan (Goal #4) was used to accomplish Goals 1 and 2. A copy of the 2013-2017 Fair Housing Action Plan is can be found on the City's website here: <https://www.cob.org/Documents/planning/housing/2013-2017-fair-housing-ap.pdf> .

c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

Looking back, we would have liked to include Section 8 recipients as a protected class in the City of Bellingham. Since our last AI, source of funding discrimination has become very common and as a result has caused many difficulties for recipients in both the City of Bellingham and in Whatcom County (the region).

d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

One of our past goals was to maintain and expand, as feasible, fair housing education and outreach efforts. During the past five years, we have provided many educational events. These events were received and attended well, but our fair housing survey indicates that more education required for both landlords and tenants.

There have been many changes in the City of Bellingham (jurisdiction) and Whatcom County (region) since we wrote our last Analysis of Impediments in 2012. Housing costs in Bellingham have risen steadily over the past five years, but incomes have not. The demand for affordable rental housing has increased and surpassed our rental housing supply. Households with a section 8 voucher are finding that many property owners in the jurisdiction and the region no longer accept their housing vouchers.

We have found that a lack of affordable housing has led to some unexpected fair housing issues that affect persons and families fair housing choice, especially a lack of housing choice.

V. FAIR HOUSING ANALYSIS

A. Demographic Summary

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

A review of HUD Table 1⁴ data indicates that the City of Bellingham's population demographics compared to that of the region reveals that in 2010 the City of Bellingham was 1.42% less White, about .47% more Black, 0.20% less Hispanic, 1.68% more Asian or Pacific Islander, 1.21% less Native American, 1.66% less foreign born, and 0.42% more limited English proficient populations (LEP) than the Whatcom County Census Bureau Statistical Area (CBSA) region. These are very slight differences in race and ethnic makeup, indicating that Bellingham's population reflects the greater CBSA.

Individuals with disabilities are 2.18% less overall in the City of Bellingham compared to Whatcom County. Broken down by disability type, the analysis shows 64% less with hearing difficulty, 0.32% less have vision difficulties, 0.13% less have cognitive difficulty, 0.61% less have ambulatory difficulty, 0.26% less have self-care difficulty and 0.22% less difficulty with independent living. The percentage of the population that comprises families with children show the City of Bellingham jurisdiction at 44.16% and the region at 42.32%. The jurisdiction has just a percentage of 1.84% more families with children than the region.

A review of Table 2 shows a population of 56,455 in the City of Bellingham in 1990. At that time, the City was 92.47% White, less than 1% black, 2.41% were Hispanic, 2.53% were Asian or Pacific Islander, and 1.73% were Native American. The foreign-born population in 1990 was 6.87% and 2.35% were LEP. The population in 1990 in the region was 117,140. The White population was less than 1% less than the jurisdiction, the Black population was 0.22% less, and the Hispanic population was 0.48% higher. The region had slightly more foreign-born (0.91 more) and virtually the same percentage of LEP as the City of Bellingham.

The 2010 Census results show that in twenty years, the city of Bellingham has increased the overall population by 13,186 people. The City's population has become less White (by 6%); more Hispanic (from 2.4% to 4.4%), and the percentage of Asian or Pacific Islander, Non-Hispanic has doubled from 2.5% to 5.0%. The Black population has gone from less than 1% (at 0.69%) to just over at 1.33%. During the same 20-year period, the region has seen a population increase of 68,480 to 196,034 people. The White population in the region decreased from 92% to 86%, while the Black population increased by only 0.55% (remaining at only 1% of the population in Whatcom County). The Bellingham CBSA Regional Hispanic population increased by just under 5,000 people, from 2.9% to 5.2% of the population. The foreign population increased from 7.8% to 9.9% and the LEP population increased to over 3,000 people from 2.3% to 3.6% of the population in Whatcom County (the CBSA region),

Persons with disabilities are represented proportionally in Bellingham in comparison to the CBSA (region) according to HUD Table 1. Persons with hearing difficulties are 3.6% of the City of Bellingham's population, while represented regionally at 4.3%. Persons with vision difficulties are 2.0% of the city while regionally the percentage is 2.4%. Persons with cognitive difficulty are 5.6% of the city while the region is 5.7%. Persons with ambulatory difficulty in the city are 5.3% of the population while 5.9% of the region has ambulatory difficulty. Persons with self-care

⁴ All data tables provided by HUD for this analysis are included in Appendix B.

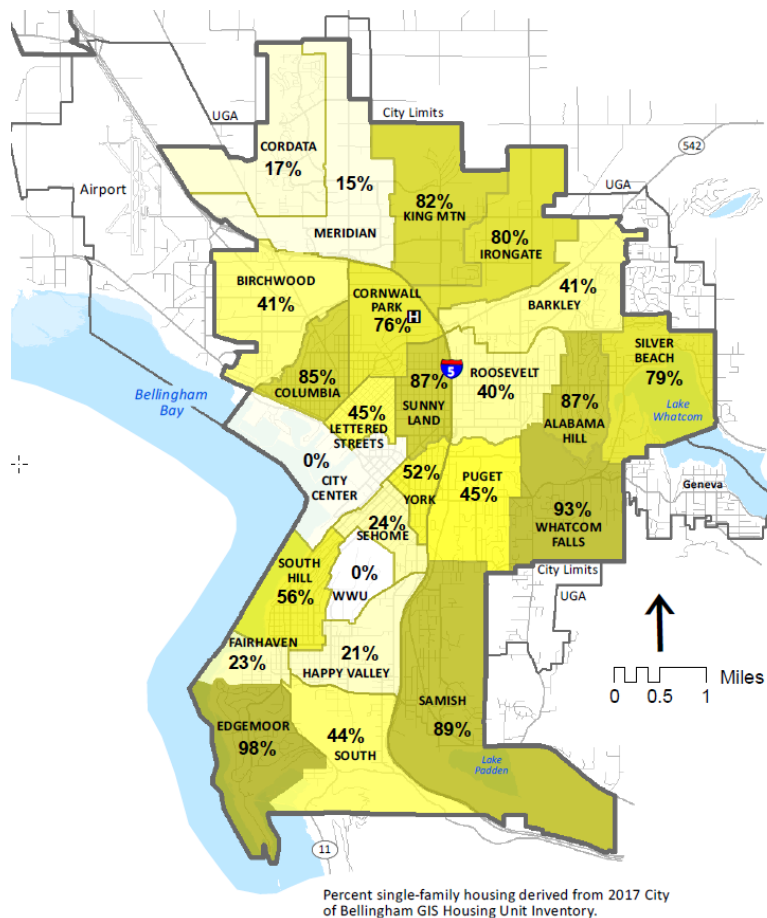
difficulty are 2.2% of the city and 2.5% of the region. Persons with independent living difficulty are 4.4% of the city and 4.7% of the region.

2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

The areas with the highest proportion of homeowners corresponds closely with the neighborhoods (or Census tracts) that have the highest percentage of single-family units. For example, Silver Beach is 79% single-family housing and Samish is 89% single-family housing (according to City of Bellingham inventory data) and both are over 80% owner-occupied according to HUD data. See Figure 1 below for the percent of single-family housing by neighborhood.

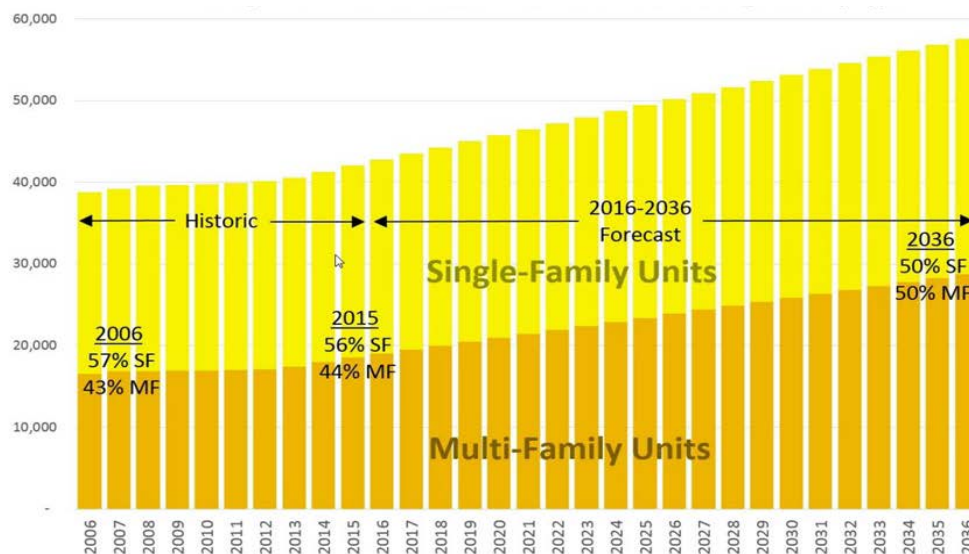
Within the jurisdiction, Census tracts to the South and East of City Center have the highest percentage of owner-occupied units. Those around City Center and Western Washington University have the lowest percentage of owner-occupied units, and the highest percentage of multi-family units (Happy Valley, Sehome, and City Center). Areas North of City Center are more mixed, with a majority of housing units that are multi-family, and 29-49% of units which are owner-occupied. One exception where there is a high proportion of single-family homes (87%), but a low proportion of owner-occupied units (29-49%) is Sunnyland. Aside from City Center and WWU (which have unique zoning), the neighborhoods with the lowest percentage of single-family housing are Cordata and Meridian.

Figure 1. Percent single-family housing by neighborhood



The following graph (Figure 2) represents the trends over time. Bellingham’s housing stock has been majority single-family in the past, but we project that it will move towards a 50/50 split between single-family and multi-family in the future.

Figure 2. Bellingham + UGA historic and forecast total housing units by type



B. General Issues

i. Segregation/Integration

1. Analysis

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

Table 3, Racial/Ethnic Dissimilarity Trends, demonstrates that the City of Bellingham's segregation levels for all races and ethnicities have remained low over the 20-year period between 1990 and 2010. Dissimilarity Index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation. In the jurisdiction, the highest level of segregation in 2010 was between Hispanics and Whites at 25.67. The second highest level of segregation was between Asian and Pacific Islanders and Whites at 25.26, and the third highest level of segregation was between Blacks and Whites at 22.87. These values are all within HUD’s range of 0-39, which suggests generally low levels of racial/ethnic segregation.

In the region (Whatcom County) the highest level of segregation was between the Black and White populations in 1990, at 30.62. All other races and ethnicities in the region had even lower levels of segregation.

- Explain how these segregation levels have changed over time (since 1990).

Dissimilarity trends between 1990 and 2010 on Table 3 indicate that the segregation levels for the City of Bellingham remained low and even dropped a small percentage for all groups except Hispanic/White, which was up by about 1%. The dissimilarity index levels in the region dropped from 1990 to 2000 between White/non-White from 23.90 to 18.56 then in 2010 it was back up to 24.07. The region also experienced a drop from 1990 to 2000 between Black/White of from 30.62

to 20.77 and then an increase to 27.09 in 2010. In the region, the dissimilarity between Asian or Pacific Islander/White has the highest level of segregation at 27.91 in 2010.

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

HUD data for this AFH analysis has not identified any HUD-defined R/ECAP areas in the City of Bellingham jurisdiction or the Whatcom County region. HUD data indicates that Whatcom County has a low level of segregation, as does the City of Bellingham (Jurisdiction). In reviewing Map #1,⁵ race and ethnicity, in the jurisdiction the population is over 80% white, Native American's make up 1.3% of the population in the jurisdiction and Hispanics 7.6%. Race and ethnicity trends show that in the region the population is even less diverse, with Whites making up 82% of the population, Hispanics 7.8%, Native Americans 2.5% and Asian/Pacific Islanders make up 3.7%. HUD's guidance documents indicate that for less than 1,000 in absolute number, as would be the case for both the Black and Native American populations in the jurisdiction, the Dissimilarity Index should be interpreted with caution.

As for populations with limited English proficiency (LEP), the two most predominant first-languages spoken in Bellingham are Spanish and Vietnamese. According to Map #4, the neighborhoods with the highest concentrations of LEP residents correspond with the Roosevelt (tract 7) and Birchwood (tract 1) neighborhoods.

The most common countries of national origin are Mexico, Canada, and Vietnam. Those having a national origin outside the United States are relatively integrated within the jurisdiction. However, the population of Mexican origin is most concentrated in the Roosevelt (tract 7), Birchwood (tract 1), Sehome and WWU (tract 10) neighborhoods.

d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

The HUD data reveals that segregation is low throughout Whatcom County. The neighborhood with the lowest percentage of rental housing is Edgemoor, with only 2%. The entire developed portion of the neighborhood consists of single-family detached homes. The percentage of owner-occupied homes is also low in areas around the Downtown Core and Western Washington University. Rental housing is 100% in these areas.

e. Discuss how patterns of segregation have changed over time (since 1990).

Between 1990 and 2015, the City of Bellingham has experienced population growth of approximately 31,673 people. The Hispanic population has more than tripled from 1,364 to 5,072 people in 2010. The Asian or Pacific Islander population has more than doubled from 1,431 in 1990 to 3,577 in 2010.

Both the City of Bellingham (jurisdiction) and Whatcom County (region) have had low segregation levels since 1990, as indicated in HUD Table 3, and continue to have segregation levels considered low. However, Table 3 also shows that while segregation levels are low according to HUD's Dissimilarity Index in both the jurisdiction and the region, in all cases it has increased since 2000. For example, in the jurisdiction the Dissimilarity Index score in 2000 was 15.54 for Non-White

⁵ All HUD-generated maps for the jurisdiction and region are publicly available at <https://egis.hud.gov/affht/>

and White populations – a very low score. However, it rose to 20.8 by 2010. A similar trend is observed across the region, and for all ethnic/racial groups. In most cases, the score got lower between 1990 and 2000, and then rose again between 2000 and 2010.

f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

Increasing cost of housing in the City of Bellingham and Whatcom County (Region) will continue to make it difficult for low-income persons to purchase homes in the jurisdiction and the region. Low-income persons may be limited to living in rental properties and limited to living in multi-family housing.

According to the 2011-2015 American Community Survey (ACS), 23% of Bellingham residents had incomes below the poverty level. At the time of the 2010 Census, there were 20% of residents below the poverty level – the rate of poverty in Bellingham is growing. Compared to the region (Whatcom County), there are a higher percentage of individuals are below the poverty level than in the jurisdiction (16% as of the 2011-2015 ACS and 14% as of the 2010 Census).

As evidence that housing prices have exceeded earnings for many households, residents in Bellingham are highly cost burdened: 19% of all households are cost-burdened and 24% are severely cost-burdened, according to 2010-2014 CHAS data. This high level of cost burdened will likely mean that families will not have the income available to save for a down payment to purchase a home in the future, keeping single-family neighborhoods increasingly higher income.

2. Additional Information

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

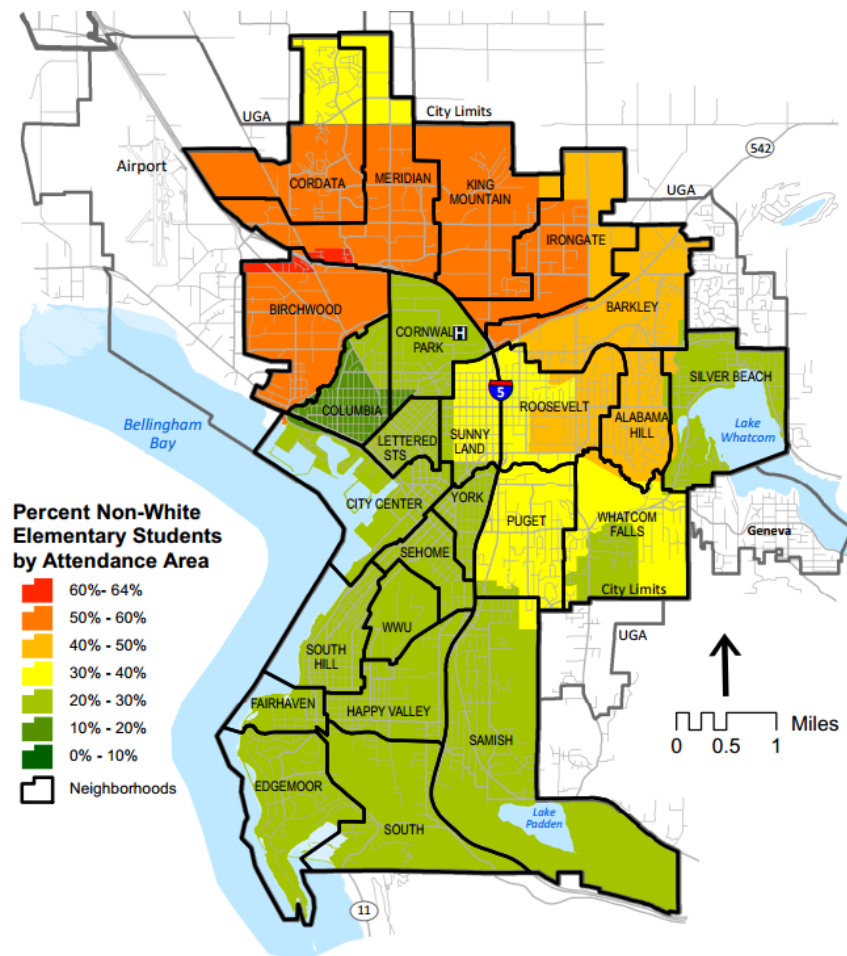
Racial/ethnic and linguistic diversity by elementary school

As additional measures of segregation or integration of racial/ethnic groups and those with LEP, we analyzed school district enrollment data by neighborhood. Figure 3 below shows the breakdown of racial diversity in Bellingham according to elementary enrollment. We can see that the neighborhoods in the North of the city are generally more diverse. The highest non-White school-age population is in the area between Meridian and Birchwood neighborhoods, which is over 60%. When examining the data, we see that the schools with the top three highest percentages of non-White students (Birchwood, Alderwood⁶, and Cordata) also correspond to the schools with the top three highest percentages of students receiving free or reduced cost meals. Alderwood is at the top of this list, with 81% of students receiving free or reduced cost meals.

Looking at the percent of elementary student who are in a transitional bilingual instruction program, the same trend remains. Alderwood had the highest percentage of LEP students (39%), followed by Birchwood (24%) and Cordata (23%).

⁶ Although it is outside the City limits at this time, Alderwood is within the City's urban growth area (UGA), and a possible annexation is being considered.

Figure 3. City of Bellingham racial diversity of elementary school students by neighborhood



Map shows percent of 2016/2017 enrolled public school elementary students identified as non-white, or more than one race for each attendance area. Data source is WA State Office of the Superintendent for Public Instruction, Report Card data for Bellingham & Meridian districts.

Perceptions of safety

The Fair Housing survey also asked respondents several questions about the neighborhood where they live. Here are some data on responses regarding perception of crime and safety:

One question asked respondents to rate how safe they felt in their neighborhood, on a scale from 1 (very unsafe) to 100 (very safe). The average score for all City neighborhoods was 67.5. Barkley was rated lowest by its residents, at just 32.5%. Alderwood, Roosevelt, King Mountain, City Center and Birchwood were also rated below average. Silver Beach, South Hill, and Edgemoor were all rated above 80% for safety.

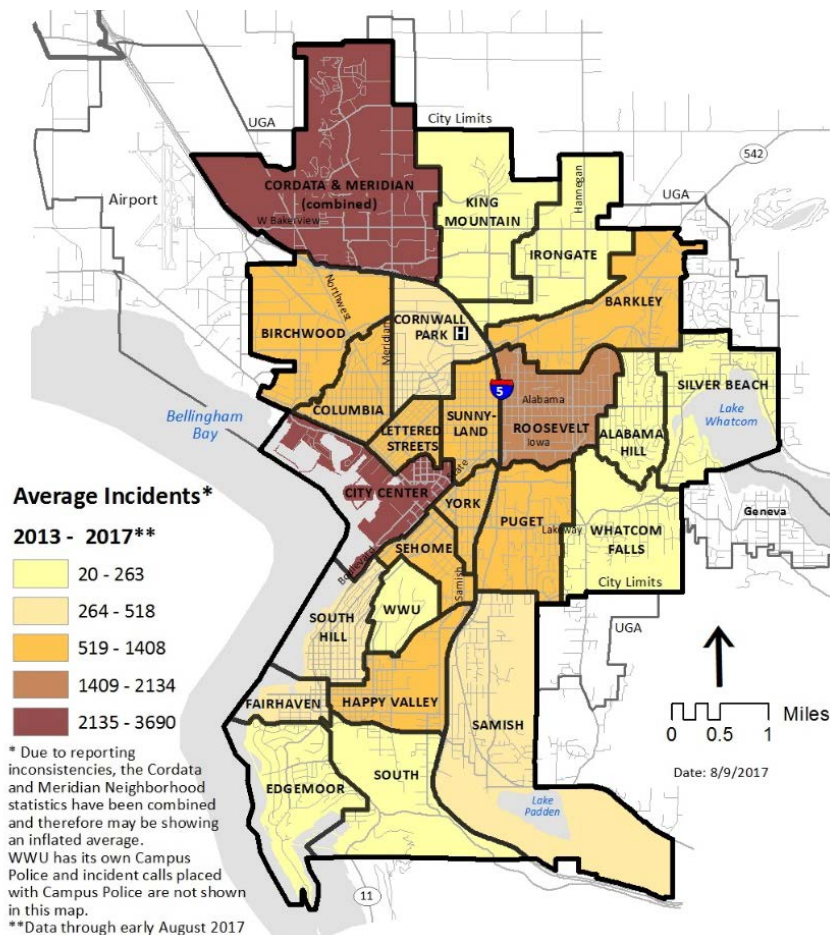
In response to the multiple-choice question, “What changes would you make in your neighborhood?”, one of the options was “Decrease crime.” The neighborhoods that ranked this option the highest were Western Washington University (73%), Roosevelt (65%), City Center (58%), Birchwood, King Mountain, and Meridian (all 53%).

In response to the question, “Has any hate crime been committed in your neighborhood/community in the last 3 years?”, Birchwood, Roosevelt, City Center, and Cordata had the highest number of

respondents who responded “Yes” (n = 17, 14, and 12, respectively). City Center had the highest percentage of respondents who said “Yes” to this question (46%).

Compared to the perceptions of safety, survey respondents’ impressions generally track well to City data on average incidents of crime. One exception was Barkley neighborhood, which was rated lowest for safety by residents, but has fewer crime incidents than several other areas. City Center, Roosevelt and Cordata/Meridian have the highest level of crime in recent years (2013-2017). Figure 4 below depicts average incidents by neighborhood.

Figure 4. City of Bellingham crime statistics



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

As reported above, Bellingham’s segregation levels have remained low, and so no such investments were made.

3. Contributing Factors of Segregation

Since there were no levels of segregation that meet HUD criteria, there were not identifiable contributing factors that lead to segregation.

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

1. Analysis

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

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

There are also no HUD-defined R/ECAP area's in the region.

b. Which protected classes disproportionately reside in R/ECAPs, compared to the jurisdiction and region.

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

c. Describe how R/ECAPs have changed over time (since 1990).

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

There are also no HUD-defined R/ECAP area's in the region.

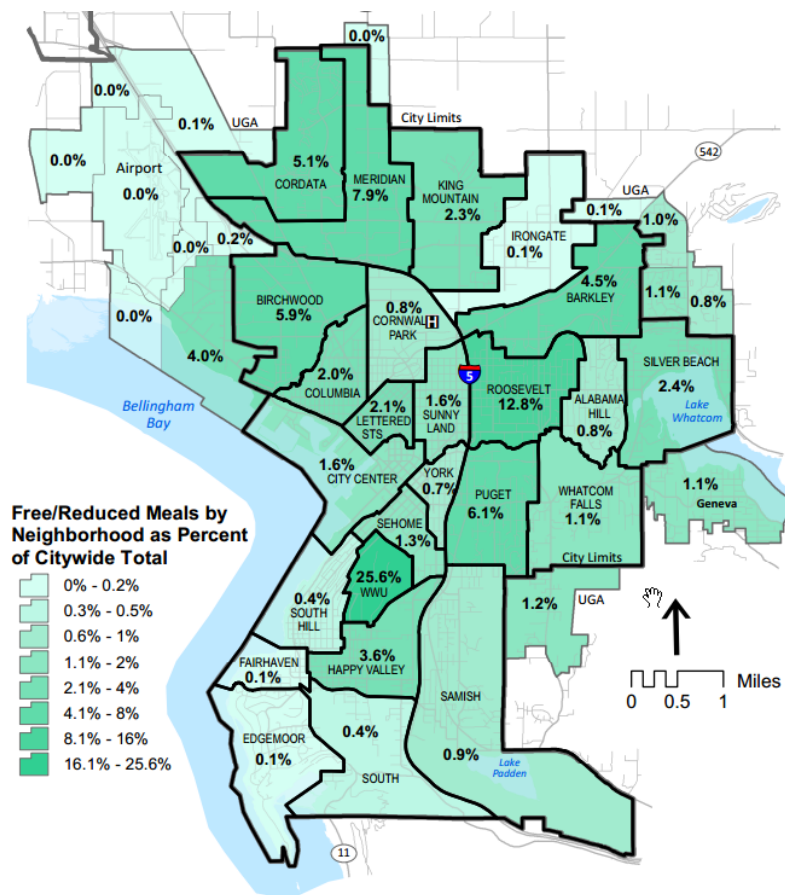
2. Additional Information

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

Using available local data on the percentage of students who receive free and reduced priced meals at school (an indicator of families with verified low-income status), we see that some neighborhoods where there are higher rates of poverty also correspond with a relatively high percentage of minority households. The most pronounced example is the Roosevelt neighborhood, which corresponds closely with Bellingham's Census tract 7. Although the neighborhood makes up only 7% of the City's total population, the students living in that neighborhood/tract make up 12.8% of the total number of students who receive free or reduced price meals – the highest concentration in the City by a wide margin (see Figure 5 below). In addition, we see that the population of tract 7 is 38.7% minority⁷ (non-White and/or Hispanic/Latino). That, compared to a City-wide population that was just 16.3% non-White and 8.1% Hispanic/Latino over the same time period, is a disproportionately high minority population which corresponds with a disproportionately large number of low-income households.

⁷ US Census. 2011-2015 American Community Survey (ACS).

Figure 5. City of Bellingham relative percent of low-income families with school-age children by neighborhood



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

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

There are also no HUD-defined RE/CAP area's in the region.

3. Contributing Factors of R/ECAPs

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

There are also no HUD-defined RE/CAP area's in the region.

iii. Disparities in Access to Opportunity

1. Analysis

a. Educational Opportunities

- i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

There are 22 Schools in Bellingham Public Schools. Fourteen of these schools are elementary schools, four (4) middle schools and four (4) high schools. In the region, Whatcom County, there are seven (7) public school districts.

School proficiency measurements are based on test scores of 4th grade students. A review of HUD Table 12 reveals that the City of Bellingham's total population school proficiency index has all races above 55 with a high of 60.68 for White students, 60.21 for Black students, and 60.15 for Native American students.

When reviewing the statistics for the jurisdiction, the City of Bellingham has a higher School Proficiency rating than all races in the region. The highest in the region is for Black students at 55.64 and White students at 54.93. At 53.44, Hispanic students are almost tied with Asian or Pacific Islander students at 53.62. Native American students are 40.62 in the region. For the population living below the poverty line, all races have a higher proficiency in the City of Bellingham jurisdiction rather than in the region

In reviewing Map 7, Demographics and School Proficiency, there appears to be no disparities of race/ethnicity, national origin and family status. Both groups are equally disbursed among the general population.

- ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

As indicated by the higher proficiency by all races in the City of Bellingham (jurisdiction) than all races in the region, Map 7 shows that all races in the City of Bellingham jurisdiction live in close proximity to proficient schools. All races including those living below the federal poverty line have access to proficient schools.

- iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school, which protected class groups are least successful in accessing proficient schools?

As stated above, all races in the jurisdiction above and below the poverty line have higher performance indices than all races regionally. Although a survey of school-related policies was not conducted for this analysis, based on Table 12 measurements the Native American, non-Hispanic population scored the lowest in the jurisdiction in School proficiency at 56.15. The Hispanic population below the poverty line scored highest at 62.09. Based on Table 12, School Proficiency Index scores, it appears that all protected classes are able to access proficient schools in the jurisdiction.

b. Employment Opportunities

- i. Describe any disparities in access to jobs and labor markets by protected class groups.

The Labor Market Engagement Index provides a measure of the unemployment rate, labor force participation rate, and the percent of the population age 25 and above with at least a bachelor's degree by neighborhood. Among the total population, White, non-Hispanic households have the highest Labor Market Index, at 59.66, and Hispanic households have the lowest at 50.92, followed by Native American households at 51.90. Among the population below the federal poverty line, the Labor Market Engagement is quite different: Hispanic households rank the highest, at 60.49, and Native American households are the lowest at 44.44. This indicates the relatively higher rate of working poor living in poverty among Hispanic households in the jurisdiction.

The Labor Market Index in Table 12 for the total population demonstrates a slightly better labor market engagement in the jurisdiction than in the region for all protected classes, except for Asian or Pacific Islander and for White households. White households have a jurisdictional index of 59.66 while in the region the index is 55.56. Asian or Pacific Islander, non-Hispanic have jurisdictional index of 54.02 in the jurisdiction and 54.88 in the region, which is slightly higher in the region. The jurisdictional index for Black households is the same at 53.04 for both jurisdiction and region. Native American, non-Hispanic households have a jurisdictional index of 51.90 and a regional index of 37.05.

For households below the poverty line, protected class households all have a higher Labor Market Index in the jurisdiction than in the region, by between 1.31 to 8.93. The highest difference is in the Hispanic population with 60.49 percentage in the jurisdiction and 51.56 in the region. The difference being 8.93 lower in the region. The protected classes of Black, Hispanic, Asian or Pacific Islander and Native American have higher jurisdictional indices.

ii. How does a person's place of residence affect their ability to obtain a job?

Distance from a potential employer can limit options for persons applying for jobs. Reliable transportation in the form of a personal vehicle or reliable public transit often is a determining factor as to whether a person will apply for certain jobs at all. Travel time to work using a personal vehicle or public transportation requires time and money. For low-income families, less time and money directly influence the quality of life for all family members.

iii. Which racial/ethnic, national origin or family status groups are least successful accessing employment?

The Table 12, Jobs Proximity Index jurisdictional scores reveal that in the total population, White, non-Hispanic persons have the lowest job proximity index of 58.82. Asian or Pacific Islander persons have the next lowest index of 60.14. Regionally the job proximity index for White non-Hispanic persons is lower at 48.47 and for Asian or Pacific Islander persons the index is 54.79. Based on the Table 12 Jobs Proximity Index scores, it appears that all protected classes are able to access jobs at a higher rate in the jurisdiction than in the region. Interestingly, the Native American population living below the poverty level score considerably higher in the jurisdiction at 69.89 compared to only 50.06 in the region.

c. Transportation Opportunities

i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

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

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

A review of the City of Bellingham (jurisdiction) Table 12, Low Transportation Cost Index for the total population indicates that Asian or Pacific Islander, Non-Hispanic have the lowest index (highest cost) at 58.92. Followed by the White population at 58.96. Of the population below the poverty line, virtually all of the population is the same with an average of 62.72 in the jurisdiction. In Whatcom County (region) Table 12 Low Transportation Cost index for the total population indicates that Native American, Non-Hispanic households have the lowest index (highest cost) of 33.16 in the region.

The Transit Trips index shows that the Native American, non-Hispanic households have the lowest transit index (less likely to use) at 75.07 in the jurisdiction. White households at 74.79, Hispanic households 76.34, Asians or Pacific Islander households at 74.62 and Black, non-Hispanic households at (most likely to use) 77.60. It appears that Native Americans are least likely to use public transit and Black households are most likely to use public transit in the jurisdiction.

The population below the poverty line in the jurisdiction maintains the pattern of Native Americans being least likely to use transit, having the lowest score at 75.67, and Black non-Hispanic households are most likely to use public transit at 80.92. The second group most likely to use transit are Asian or Pacific Islander at 79.72, Hispanics at 79.55, and White at 79.51.

In the region, of the population below the federal poverty line the group least likely to use transit is Native Americans at 57.84, the second least likely to use transit is Whites at 67.80, third Hispanic, Asian or Pacific Islander households are fourth least likely to use transit. Black non-Hispanic households are most likely to use public transport with a rating of 78.61.

ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

Asian or Pacific Islander, Non-Hispanic households have the lowest Low Transportation Cost index (highest cost) at 58.92 in the jurisdiction. Native Americans, non-Hispanic households have the lowest index (highest cost) at 33.16 in the region. White, non-Hispanic households are the second lowest index (highest cost) at 42.33 regionally and 58.96 in the jurisdiction. Black, non-Hispanic households 62.02 in the region and 49.07 in the jurisdiction. Hispanic households are at 41.43 in the region and 60.22 in the jurisdiction. Native American households have one of the highest index (lowest cost) transportation in the jurisdiction at 61.22 and the region at 61.82.

For population below the poverty line, all households in the region have a lower transportation cost index (higher cost) than any of the households in the jurisdiction. Hispanic households below poverty have the lowest index (highest cost) in the jurisdiction at 61.68, and 42.63 in the region. The next lowest index (highest cost) is Native American, non-Hispanic households at 61.68 in the jurisdiction and 42.63 regionally. Followed by White, non-Hispanic at 63.36 in the jurisdiction and 49.42 in the region. Black, non-Hispanic households have a Low Transportation Cost index of 61.82 below poverty in the jurisdiction and 59.18 in the region.

The combination of the Transit Trips Index and Low Transportation Cost Index indicates that White, non-Hispanic, Hispanic, and Native American households have the lowest scores all in the region and would be most impacted by a lack of a reliable, affordable transportation connection between their place of residence and opportunities in the both the jurisdiction and the region.

For the population below poverty, Native American, Hispanic and White, non-Hispanic households in the jurisdiction have the lowest scores and would be impacted the most by a lack of reliable, affordable transportation connection between their place of residence and opportunities. In the region, Native American, Hispanic and White, non-Hispanic households score lowest, and therefore would suffer the largest impact by a lack of transportation options.

iii. Describe how the jurisdiction and region's policies, such as public transportation routes or transportation systems designed for use of personal vehicles, affect the ability of protected class groups to access transportation.

In the jurisdiction, the Transit Indices are high for all races. The indices are even higher for those below the poverty line. Whatcom Transportation Authority is available to all residence in the jurisdiction with many options. WTA provides fixed bus routes, and bus passes and reduced fare cards are available in both the jurisdiction and the region. Some regional areas offer a Flex Route where the driver will pick up at an alternative stop with at least two hours' notice. WTA provides paratransit services to seniors and people with disabilities. Eligibility is based on disability, age, and other criteria. Zone Service provides limited transit service to rural areas of Whatcom County (region). There are no eligibility requirements for using zone service; anyone within the designated area can request a ride. Service is only available to each zone on certain days of the week. Vanpool is also a successful program, which allows a group of people to lease a WTA-owned van for commuting to and from a common worksite.

As well as the Whatcom Transportation Authority, there are other transportation options in the City of Bellingham (jurisdiction) and Whatcom County (region).

- DSHS Medical Transportation: provided for Medicaid clients to DSHS-covered medical appointments. Transportation made possible through bus passes, gas vouchers, or another provider.
- Volunteer Drivers: volunteers may be available through Whatcom Volunteer Center to drive low-income seniors and disabled persons to medical appointments. Love INC. is a consortium of volunteers from area churches that work together to provide volunteer services to needy persons.
- Veteran's Services: Disabled American Veterans (DAV) provides daily van transportation from Bellingham (6:45 am) to the Veterans Medical Center in Seattle.
- Cabulance Services: Provider offers passenger, Wheelchair, or stretcher van services.

- Lummi Transit: bus service for Lummi Indian Reservation.

d. Low Poverty Exposure Opportunities

i. Describe any disparities in exposure to poverty by protected class groups.

The Low Poverty Index in HUD Table 12 uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood, a higher score generally indicates less exposure to poverty at the neighborhood level. In the City of Bellingham jurisdiction, Native American, non-Hispanic households have the most exposure to poverty based on the lowest index score of 39.37, followed by Hispanic households with a score of 39.42. The next protected class with the third highest exposure to poverty is the Black, non-Hispanic households with a score of 60.97. Asian or Pacific Islander, non-Hispanic have the fourth highest exposure to poverty with a score of 44.79. White, non-Hispanic households have the least exposure to poverty in the jurisdiction with a score of 49.15. For all ethnic/racial groups, the Low Poverty Index is higher (better) in the region compared to the jurisdiction.

For the population in the jurisdiction living below the poverty line there, is a slightly different order. Native American, non-Hispanic have a score of 36.54, second is Black, non-Hispanic at 38.24, Asian or Pacific Islander, non-Hispanic at 41.75, and White at 45.66. At 49.09, the Hispanic population has the least exposure to poverty. For the population in the region below the poverty level, Native American households score even lower than within the jurisdiction, at 38.13.

ii. What role does a person's place of residence play in their exposure to poverty?

“Residents of high-poverty neighborhoods are more likely to live in substandard housing that can expose children to multiple health hazards including lead poisoning and asthma. Perhaps less obvious but equally important is the fact that children living in poor neighborhoods are more likely to attend underperforming schools and have fewer job opportunities, which can limit social mobility, and therefore health across generations.”⁸ It appears that exposure to poverty in the jurisdiction is higher compared to within the region, but for Native American households, their poverty exposure is higher than other groups no matter where they live.

iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

In both the region and the jurisdiction, Native American, non-Hispanic households have the most exposure to poverty. In the jurisdiction, Native American, non-Hispanic households have the most exposure to poverty based on the lowest index score of 39.37 followed closely by Hispanic households with 39.42. Black, non-Hispanic households are 42.19 and Asian or Pacific Islander, non-Hispanic are 44.72. In the jurisdiction White, non-Hispanic, households have the least exposure to poverty with an index score of 49.15. For the population below poverty, Native American, non-Hispanic households have the most exposure to poverty with a score of 36.54 followed by Hispanic households with a score of 39.42. The White, non-Hispanic population and the Asian or Pacific Islander, non-Hispanic have the least exposure to poverty with scores of 49.15

⁸ An excerpt from, *Making the Case for Linking Community Development and Health*. Braveman PA, Dekker M, Egerter S, Sadegh- Nobari T, Pollack C. Issue brief: housing and health. Princeton, NJ: Robert Wood Johnson Foundation Commission to Build a Healthier Communities.

and 44.79 respectively. Below the poverty line in the jurisdiction, the Hispanic population has the least exposure to poverty at 49.09. Second is the White, non-Hispanic households at 45.66. Asian or Pacific Islander, non-Hispanic has 41.77 and Black, non-Hispanic has 38.24.

In the region, Native American, non-Hispanic households have the most exposure to poverty based on the lowest index score of 40.09. Native Americans households below the poverty line have a Low Poverty Index score of 38.13, followed by Black, non-Hispanic households with a score of 48.40, and below the poverty line it is 40.11. The next protected class with the third highest exposure to poverty is the Hispanic class with a score of 50.71, and a score of 47.45 in the population below federal poverty line. Asian or Pacific Islander, non-Hispanic households have the fourth highest exposure to poverty with a score of 51.54 and below the poverty line it is 43.48. White, non-Hispanic households have the least exposure to poverty in the jurisdiction with a score of 54.12 above the poverty line and 49.11 below.

iv. Describe how the jurisdiction and region's policies affect the ability of protected class groups to access low poverty areas

There are areas in the jurisdiction that do not support the building of multi-family housing developments or affordable housing developments in their neighborhoods. With escalating housing prices, the lack of availability of affordable and accessible housing units in these neighborhoods may affect the ability of protected class groups to access low poverty areas.

e. Environmentally Healthy Neighborhood Opportunities

i. Describe any disparities in access to environmentally healthy neighborhoods by protected class group.

The environmental health index listed in HUD Table 12 indicates the health of neighborhood based on exposure to air pollution. The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory, and neurological toxins by neighborhood. Map 12 shows residency patterns of racial, ethnic, and national origin groups and families with children. Overlaid by shading showing the level of exposure to environmental health hazards for the jurisdiction and the region. A higher Environmental Health Index indicates a better environmental health level or less exposure to toxins harmful to human health.

In general, the Native American population has the least exposure to harmful toxins. All races have a high environmental health index in both the jurisdiction and the region.

ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

In the City of Bellingham jurisdiction, Asian or Pacific Islander households have the highest score (least exposure) on the Environmental Health index at 64.87. Second is Hispanic households at 63.56. Third and fourth are White, non-Hispanic and Black, non-Hispanic at 62.13 and 61.29 respectively. The lowest score, and therefore the least access to healthy neighborhoods, is the Native American, non-Hispanic population at 60.31. In the population below the federal poverty line, the order is somewhat different. The highest score is the Black, non-Hispanic households with a score of 65.86 followed by the Hispanic population at 62.94. Third is White, non-Hispanic with a score of 61.43 and fourth is Native American, non-Hispanic with an Environmental Health Index of 61.75. The group with the lowest index (most exposure) is Asian or Pacific Islander, non-Hispanic at 59.86.

In the region, the Environmental Health Index numbers are higher in every category, both above and below the federal poverty line (indicating lower exposure overall). The group with the highest index is Native American, non-Hispanic with a score of 81.01. The second highest group are the Hispanic households in the region at 75.59. White, non-Hispanics are third at 73.27 and fourth are Asian or Pacific Islander, non-Hispanic at 72.14. The group with the lowest number is Black, non-Hispanic with an index of 70.08. The numbers under the poverty line are Native American, non-Hispanic are 76.63. Then Hispanic households at 74.25. The third highest index is White, non-Hispanic at 71.23 and fourth is Black, non-Hispanic households at 66.69. The group with the lowest index is Asian or Pacific Islander, non-Hispanic with an index of 66.6

f. Patterns in Disparities in Access to Opportunity

- i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

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

2. Additional Information

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

The Fair Housing survey asked respondents about access to opportunity. However, there was no detectable difference between respondents by race about how they rated their access to opportunity. The survey did not ask respondents about their National origin.

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

The Fair Housing survey asked respondents several questions about the neighborhood where they live. Here are some responses to data regarding perception of access to employment opportunities and services by neighborhood:

One question asked respondents to “rate the availability of employment opportunities in or near your neighborhood” on a scale from 1 (very low) to 4 (excellent). Fairhaven was lowest with a ranking of 1.79, followed by Birchwood with 2.02. The highest ranked were Irongate (2.83) and South Hill (2.67). No neighborhoods were ranked at a 3 or above.

Another question asked respondents to “rate the access to services in or near your neighborhood (hospitals, shops, restaurants, parks, etc.). The scale was also from 1 (very low) to 4 (excellent). On average, all neighborhoods were rated higher in this area compared to access to job opportunities. The lowest ranked neighborhoods were Irongate (2.57), Alderwood (2.71) and Samish (2.88). The highest ranked neighborhoods were Sunnyland (3.57), City Center (3.46), Barkley and Edgemoor (3.44).

3. Contributing Factors of Disparities in Access to Opportunity

- The availability, type, frequency, and reliability of public transportation
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Location and type of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Low vacancy rates

iv. Disproportionate Housing Needs

1. Analysis

- a. Which groups (by race/ethnicity and family status) experience higher rates of housing, cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

In the jurisdiction, 61.33% (1,015 of all 1,655) Hispanic households experiencing any of the four housing problems is the highest rate by racial/ethnic group. The second highest rate is for Other, non-Hispanic households with a 49.37% rate and the third highest rate is for Native American, non-Hispanic at 44.95%. White, non-Hispanic have a rate of 43.82%, Asian or Pacific Islander, non-Hispanic 41.42% and Black, non-Hispanic group has the lowest rate 38.37%. The total number of households with problems is 15,100 out of 33,805 households, or a percentage of 44.67%.

Severe Housing Problems in the jurisdiction follow a similar pattern of being highest among Hispanic households at 35.65%, followed by Asian or Pacific Islander non-Hispanic at 32.64% of households, and Other, non-Hispanic 31.01% of 790 total Other, non-Hispanic households in the jurisdiction.

Disproportionate Housing Needs in the jurisdiction by household type and size are highest for family households with children (5+ people) at 69.84% (880 of 1,260 total households) in this category. The second highest rate is for non-family households at 53.17%. Family households with less than five people had the lowest rate, at 32.43% of households experiencing housing problems out of 14,865 households in this category.

In the region, the group with the highest rate of housing problems is the Hispanic group as well, with 56.72%. The second highest group is the Black, non-Hispanic population, with 42.22% reporting housing problems (or 274 of the 649 Black households in the region). The third highest rate of housing problems is the Native American, non-Hispanic households group with a rate of 42.45% (or 675 of 1,590 households) with housing problems.

Severe housing problems for the region have the highest rate among Hispanic households with a rate of 34.26%. For Asian or Pacific Islander, non-Hispanic households it is 24.91%, and Other, non-Hispanic 23.68%, report severe housing problems.

Disproportionate Housing needs in the region by household type and size are highest for non-family households of 49.58%, almost half of the 30,635 of households in the category, 15,190 of them have disproportionate housing needs in the region. Family households with less than 5 people

had the lowest rate of 31.65% of households experiencing housing problems from a total of 79,240 households in the category.

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

HUD Map 6, Housing Burden by Race/Ethnicity, reveals that the jurisdiction and the region are both predominantly White, with no areas of minority concentration. On Map 6 for the jurisdiction, the darkest shaded areas represent the Happy Valley neighborhood, WWU, City Center, and on the area east of I-5 from Samish Way to Sunset as having the highest housing burden. The City of Bellingham has shown that there are no R/ECAPs in the jurisdiction or the region, and no segregated areas, so there is no alignment between race/ethnicity and these areas.

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

HUD Table 9 indicates that 32.43% of family households in the jurisdiction with housing problems have less than 5 members and 69.84% of family households with housing problems have more than 5 members. In the jurisdiction, non-family households have 53.17% of housing problems. In the region 31.65% of households with less than 5 people and 48.68% of households with 5 or more members, have housing problems. The non-family households in the region have 49.58% of housing problems. In both the jurisdiction and region, households with 5 or more members have more housing problems.

Publicly Supported Housing Table 11 indicates that in Public Housing units, 13.13% of households have children. Of all public housing units, 76.97% are efficiency or 1-bedroom units. 16.16% are 2-bedroom units and 6.46% of the units are 3 or more bedrooms in size. Accordingly, the 22.62% of total units that have two or more bedrooms should be adequate to accommodate the 13.13% of households with children.

Table 11 also shows that Project-based Section 8 units are 0% occupied by households with children. Section 8 units are comprised of 0-1 bedroom units by 100%. Therefore, households with children may be excluded from project-based Section 8 housing.

There are zero other multi-family units listed on Table 11. Table 11 also shows that of all the Housing Choice Voucher (HCV) program participating households, 29.90% have children, and 43.12% are efficiency to 1-bedroom units, 35.82% are two bedroom units and 18.78% of the units are 3+ bedrooms.

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

In the jurisdiction, 54.3% of units are renter occupied and 45.7% are owner occupied (5.7% were vacant) as of the 2010 Census. Overall, the jurisdiction was 84.9% White and about 15% non-White. However, of the owner-occupied housing units, only 2.8% were occupied by non-White householders (compared to 7%, which would be proportionate if 15% of the homeowner population were non-White).

By contrast, 9.4% of the renter households are non-White (compared to 8% which would be proportionate if 15% of the renter population were non-White). The Hispanic population of the

jurisdiction was 7%, and Hispanic householders make up 1.2% of owner-occupied households and 3.7% of renter-occupied households.

2. Additional Information

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

In our jurisdiction, CHAS data reveals that renters are disproportionately more cost burdened than home owners (55% compared to 28%). Renters are not a protected group, but since non-White households are less likely to own and more likely to rent their homes, they could be disproportionately affected by housing cost burden. Also, female heads of household with children have a poverty rate of 50.1% compared to all families with children, whose poverty rate is 20.5% (2010 Census data).

According to 2010-2013 ACS data, Hispanic and Latino households making 50%-80% of AMI are disproportionately more likely to have severe housing problems. There are 155 Hispanic or Latino households in this group with severe housing problems out of the 1,215 for the jurisdiction as a whole. This means that Hispanic or Latino households experience nearly 13% of the severe housing problems although they make up less than 3% of the population.

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

No other relevant information is available.

3. Contributing Factors of Disproportionate Housing Need

- The availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures

The Bellingham City Council has been discussing a list of housing issues in the jurisdiction such as source of income discrimination, rent increase notification, no-cause notice of vacation, and inclusionary zoning among others.

C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly supported Housing Demographics

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

A review of HUD Table 6 data indicates that the residents of all publicly supported housing are predominantly White making up 81.10% of residents in public housing. The White resident population is 92.96% in project-based Section 8 housing, and 84.16% in the HCV Program. This generally proportionate, but somewhat underrepresented compared to the total population of the jurisdiction.

The Black population residing in public housing is 2.85%, and using the HCV is 4.01%. This is three times the Black percentage of the general population. The Black population seems to be over

represented in public housing in general and the HCV programs, yet under-represented in the project-based Section 8 program (0.00) and other Multifamily housing.

The Hispanic population in public housing is 8.33%, project-based Section 8 is 5.63%, and the HCV program is 6.24%. The Hispanic population is also slightly over-represented by being over the total population of (7.63%) by (.70%).

The Asian population in the jurisdiction was 5.38% of the general population. Public housing units are occupied by 5.69% Asians, project-based Section 8 were made up of 1.41% Asian residents, and HCV programs were made up of 2.3% Asians. This data reflects that the Asian population is slightly over-represented in public housing units, and under-represented in project based Section 8.

- ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

As stated above, the Black population appears to be over-represented in public housing and in the HCV programs, yet under-represented in the Project Based Section 8 Program (0.00%). Since the Census data indicates that 1.36% of the jurisdiction is Black, it appears that Blacks are over represented in the 0-30% AMI eligibility category.

The Hispanic population income statistics show 5.64% at 0-30% AMI, 5.54% at 30-50% AMI, and 6.56% at 50-80% AMI. The total Hispanic population is 7.63% of the general population.

The Census data shows that 5.38% of the jurisdiction is Asian, it appears that Asians are over-represented in the 0-30% AMI group at 6.68%, the 30-50% AMI group is 5.11%, and 50-80% group is 4.24%.

b. Publicly Supported Housing Location and Occupancy

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

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

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

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

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

The demographic composition would be the same in all categories. As stated above the City of Bellingham has no HUD identified R/EACP areas.

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

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

- iv. (B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

No other relevant information is available.

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

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

c. Disparities in Access to Opportunity

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

Publically supported housing is located throughout the jurisdiction. As stated earlier, the jurisdiction has no readily identifiable areas that experience poor access to opportunity and high exposure to adverse factors. The jurisdiction has no HUD identified R/ECAPS and no protected classes that are either Moderately Segregated or Highly Segregated.

A review of HUD Table #12 indicates that all protected class households in the jurisdiction including residents of publically supported housing have higher (better) access to opportunity than the same classes in the region.

2. Additional Information

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

No other relevant information is available.

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

3. Contributing Factors of Publicly Supported Housing Location and Occupancy

- Community opposition
- Private discrimination

D. Disability and Access Analysis

1. Population Profile

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

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

Table 13 Disability by type data reveals that persons with disabilities in the jurisdiction as a percentage of the population are similar to the percentages in the region. Persons with hearing difficulty are 3.64% of the jurisdiction and 4.28% of the region. Vision difficulty is 2.04/2.36, cognitive difficulty is 5.57/5.70, ambulatory difficulty is 5.25/5.86, self-care difficulty is 2.21/2.47 and independent living difficulty is 4.44/4.66%. The difference between the jurisdiction and the region on Table 13 for each type of disability is never more than 0.64.

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

Map 14 by disability type reveals that persons with disabilities live throughout the jurisdiction with no particular concentration areas. In the region persons with disabilities appear to be in areas of higher population.

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

2. Housing Accessibility

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

HUD has provided no data for this question at the time of this analysis. Map 5 shows that Publicly Supported Housing is distributed throughout the Jurisdiction and in populated areas of the region.

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

The City of Bellingham has no R/ECAPs or other segregated areas.

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

Table 15 indicates that persons with disabilities are able to access publicly supported housing in the jurisdiction and in the region. In public housing, 64.04% of the residents have a disability while 55.44% of residents in the region do. The jurisdiction has 8.6% more residents who are disabled. Project based Section 8- 64.00%/35.55% a difference of 28.45%. For Other Multifamily HUD has provided no data for either the jurisdiction or the region. In the Housing Choice Voucher (HVC) Program 37.92%/35.07% a 2.85% difference.

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

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

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

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

The average waitlist for disabled adults in need of housing is six years. There are currently 149 individuals on the waiting list for these units. Most people who are disabled and renting must rely on the private market to find housing that meets their needs, and make reasonable accommodations as necessary.

4. Disparities in Access to Opportunity

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

The City of Bellingham's goal is to ensure that all programs, services, activities, and facilities offered to the public are accessible as required by the Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973, section 504. The City of Bellingham has an ADA transition plan in place. The ADA Transition Plan Task Force is in the process of identifying elements needed for the plan revisions. An excerpt is below.

NOTICE OF NON-DISCRIMINATION UNDER TITLE II OF THE AMERICANS WITH DISABILITIES ACT AND SECTION 504 OF THE REHABILITATION ACT

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

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

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

Modifications to Policies and Programs: The City of Bellingham will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, activities and facilities. The ADA does not require the City of Bellingham to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

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

Contact Information: You may contact the designated ADA/504 Coordinator if:

- you have questions, concerns or requests for additional information regarding the Americans with Disabilities Act or Section 504 of the Rehabilitation Act.
- you require an auxiliary aid or service for effective communication or a modification of policies or procedures to participate in a City program, service or activity. Please make requests as soon as possible, but no later than 48 hours before the scheduled event.
- you have a complaint that a City program, service, activity or facility is not accessible to persons with disabilities.

ADA/504 Coordinator
City of Bellingham
210 Lottie Street, Bellingham WA 98225
Voice (360) 778-7900
FAX (360) 778-7901
TTY (360) 778-8382
pw@cob.org

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

The City of Bellingham is currently embarking on an update to our Section 504 Self-evaluation Transition Plan. This Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan is being prepared to fulfill the requirements set forth in the Title II of Americans with Disabilities Act. The ADA states that a public entity must reasonably modify its policies, practices, or procedures to avoid discrimination against people with disabilities. This report will assist the City of Bellingham in reviewing its rules, policies and physical features (sidewalks, crosswalks, bus stops, etc.) that are within the public Right-of-Way.

iii. Transportation

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

iv. Proficient schools and educational programs

As indicated by the higher proficiency by all races in the City of Bellingham (region) than all races in the region. All races including those living below the federal poverty line have access to proficient schools. Map 7, Demographics and School Proficiency, shows that all races as well as the disabled people in the City of Bellingham jurisdiction live in close proximity to proficient schools.

v. Jobs

Distance from a potential employer can limit options for persons applying for jobs. Reliable transportation in the form of a personal vehicle or reliable public transit often is a determining factor as to whether a person will apply for certain jobs at all. Travel time to work using a personal vehicle or public transportation requires time and money. For low-income families, less time and money directly influence the quality of life for all family members. Persons with disabilities are represented proportionally in Bellingham in comparison to the CBSA. So they have the same opportunities as all Citizens in Bellingham.

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

In the jurisdiction, persons with disabilities who face an access barrier can contact the particular public entity by phone or e-mail to request an accommodation to access the jurisdictions government services, facilities and infrastructure.

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

No data on difficulties in achieving home ownership by person with disabilities is available at this time.

5. Disproportionate Housing Needs

a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities

HUD Tables 9,10, and 11 and HUD Maps 7 and 8 detail disproportionate housing needs in the jurisdiction and the region, however, the data is not specific to persons with disabilities. Housing staff in the jurisdiction conclude that disproportionate housing needs are experienced by persons with certain types of disabilities in the jurisdiction and the region at a similar rate to all low-income persons in the jurisdiction and the region.

6. Additional Information

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

No other relevant data assessment of disability and access issues is available for this question at this time.

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

The City's Fair Housing Survey asked all participants to rate the availability of employment opportunities in or near their neighborhood. Those households with a member who is disabled were significantly less likely to rate the employment opportunities in their neighborhood as "Good" or "Excellent", compared to households where no one was disabled. Of those who identified as having a member of the household who is disabled, 26% rated the access to employment opportunities in their neighborhood as either Good (21.3%) or Excellent (4.8%). Meanwhile, of those who did not rate themselves as having a disabled member of the household, 36% rated their access to employment opportunities as either Good (31%) or Excellent (5.3%). Therefore, we see a ten percentage point difference between these two groups of survey respondents.

We observed a similar trend when we asked participant to rate the access to service (like hospitals, shops, restaurants, and parks) in or near their neighborhood. Those without a disability were significantly more likely than those with a disability to rate their access as "Excellent" (38% without a disability rated their access to services as "Excellent" compared to 29% with a disabled member of the household).

7. Disability and Access Issues Contributing Factors

- Access to publicly supported housing for persons with disabilities
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of assistance for housing accessibility modifications
- Land use and zoning laws
- Low vacancy rate

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

1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

The jurisdiction has no, unresolved HUD civil rights violations, no cause determination from an equivalent state or local fair housing agency concerning a violation of a state or local fair housing law. We do not have any letter of findings issued by or lawsuit filed or joined by the Department of Justice and no False Claims Act allegations.

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

Although the City of Bellingham is not considered substantially equivalent to Federal Fair Housing law, Bellingham proscribes Fair Housing Practices in Section 10 of its municipal code. Last

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

HUD Certified Substantially Equivalent jurisdiction Protected Classes

Basis	Federal	State	King County	Seattle	Tacoma
Age			X	X	X
Ancestry				X	X
Color	X	X	X	X	X
Creed		X		X	
Familial status/Parental Status	X	X	X ⁹	X	X
Gender Identity		X	X	X	X
Handicap/Disability	X	X	X	X	X
Marital status		X	X	X	X
National origin	X	X	X	X	X
Political ideology				X	X
Race	X	X	X	X	X
Religion	X	X	X	X	X
Retaliation	X	X	X	X	X
Sex	X	X	X	X	X
Sexual orientation		X	X	X	X
Section 8 recipient			X	X	X
Use of a Guide Dog/Service Animal	X	X	X	X	X
Veteran or Military Status		X		X	

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

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

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

⁹ King County and the City of Seattle use the term parental status instead of the federal terminology of familial status

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

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

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

- State of Washington – Human Rights Commission (WSHRC)
- King County – Office of Civil Rights (COCR)
- Seattle Office for Civil Rights (SOCR)
- Tacoma Human Rights and Human Services Department (THRHS)

4. Additional Information

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

The jurisdiction's and the region's primary source for fair housing advocacy and education resources is the Fair Housing Center of Washington. The Fair Housing Center is a HUD designated nonprofit qualified Fair Housing Organization and serves residents of Bellingham. The Fair Housing Center is the only HUD-qualified nonprofit fair housing organization serving western Washington. Nonprofit fair housing agencies have the ability to act as advocates for individuals that have experienced discrimination in housing by supporting them through the complaint process, conducting education, outreach, and participate in HUD approved enforcement activities.

The US Department of Housing and Urban Development (HUD) administers the Fair Housing Act. In certain cases, HUD refers complaints to the Department of Justice (DOJ). HUD is also required to work on programs of voluntary compliance with the Fair Housing Act.¹⁰ To do so, HUD enters into voluntary compliance agreements with housing industry organizations. These organizations pledge to inform the public of equal housing opportunity and the law to ensure that services are rendered equally to all clients, to publish their commitment to fair housing, and to monitor and report on the effectiveness of the agreement. The agreements for the real estate industry are called Voluntary Affirmative Marketing Agreements and for others, Best Practice Agreements.

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

¹⁰ US Congress, Title VII I, Civil Rights Act of 1968 (42 US C.3600-3620); sec 7(D). Department of Housing and Urban Development Act, 42 US C. 3535(d)

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

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

5. Fair housing enforcement; outreach Capacity, and resources contributing factors

- Lack of local private fair housing outreach and enforcement
- Lack of resources for fair housing agencies and organizations
- Lack of state or local fair housing laws

VI. FAIR HOUSING GOALS AND PRIORITIES

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

The following Contributing Factors were identified as most limiting fair housing choice and access to opportunity in Bellingham, in order of priority.

- **Lack of affordable, accessible housing in a range of unit sizes.** Housing costs in Bellingham have risen steadily over the past five years, but incomes have not. In addition, the portion of the population renting rather than owning homes has been increasing. This has created a level of demand for affordable, primarily rental housing in the market that exceeds supply. The high demand further drives up prices and many households cannot find a home to either rent or purchase within their price range or near their jobs, children's schools, or public transit. Even for those who already own their homes, some are still struggling to get out from being underwater due to the recent recession, and increasing home values can translate to increased property taxes, which are a struggle for low-income families whose wages have remained relatively flat. The Washington State department of Commerce estimates that just 34% of homes in Whatcom County are affordable to residents making 100% of the area median income (AMI). The Bellingham/Whatcom County Housing Authority has long waiting lists for all its housing programs. The Kulshan Community Land Trust assists homebuyers who make 80% of the AMI or less. They currently have a waiting list of 6 months to 3 years for qualified, approved buyers. The major limiting factor is lack of housing stock.
- **Low vacancy rate.** A slowdown in housing production after the 2008 recession, coupled with population growth, has led to a very low vacancy rate in Bellingham, which is now estimated at just 1.8% (and is lower than Washington State's average vacancy rate). This low vacancy rate drives up housing costs and makes it increasingly difficult for those who have housing assistance or poor credit to find any affordable housing. Many vouchers have been extended because they were set to expire before the recipient was able to find a unit, and even with an extended 120-day period to find a unit, only about 58% of those who are offered a voucher are actually able to use it. This has resulted in having to open the Section 8 waiting list up for new applicants, not because current voucher holders are moving up and out of the need for a voucher, but because voucher-holders are failing to find a unit to begin with in the allotted time. Although some of these trends are outside of the City's sphere of influence, the low vacancy rate is nonetheless an important contributing factor that limits access to fair housing.
- **Private discrimination.** Private discrimination is by far the most common in Bellingham, with 84% of respondents that experienced housing discrimination saying it was a property owner or property manager who discriminated against them. Because there are many qualified applications interested in each available rental unit, property management companies and landlords can easily discriminate against entire categories of renters, and those who are on housing assistance are especially vulnerable to discrimination; rental listings often include "no housing assistance" among their restrictions. Another kind of

restriction commonly advertised is “no students.” Discrimination against protected classes that were mentioned most frequently in response to our survey were because of family/marital status or age.

- **Lack of local private fair housing outreach and enforcement.** Of survey respondents that said they had experienced housing discrimination, 93% said they did not report the discrimination. The top reason given for not reporting was that they do not believe it makes any difference (66%). This clearly speaks to a lack of faith in fair housing enforcement, and a need for citizens to and property owners to be made aware of the laws and penalties that protect access to fair housing.
- **Displacement of residents due to economic pressures.** Residents in low- and middle-income jobs report that they are being forced to move outside of the City in search of housing they can afford. In addition, homelessness has been a growing problem in Bellingham, and has increased nearly 50% since 2012. One of the reasons linked to this increase is the lack of affordable housing units and corresponding rise in rental costs.
- **Access to publicly supported housing for persons with disabilities.** The average waitlist for disabled adults in need of housing is six years. There are currently 149 individuals on the waiting list for these units. Most people who are disabled and renting must rely on the private market to find housing that meets their needs, which is increasingly difficult in a tight housing market.
- **Lack of assistance for housing accessibility modifications.** There are no local sources of funding to assist property owners or the disabled with making modifications to rental housing to accommodate disabilities, and no local sources for education about reasonable accommodation rules. The local housing rehabilitation program run by the City does offer very low interest, deferred payment loans for low-income disabled homeowners to make necessary improvements, but a similar program is not available at this time for rental units.
- **Community opposition.** In the past, there has been significant opposition to making changes to existing zoning laws in some neighborhoods. There is concern that allowing more renters by way of changing occupancy ordinances or building more multi-family units will change the character of existing single-family neighborhoods, decrease parking, increase noise, etc. Community opposition could be a barrier to changing these land use and zoning laws in the future.
- **Land use zoning laws.** Some ordinances that are currently a part of Bellingham’s municipal code may inadvertently exacerbate the shortage of housing options, lack of housing mobility, and socioeconomic segregation. This is because of occupancy restrictions (discussed below) and single-family zoning prevents the development of more affordable multi-family units in many neighborhoods.
- **Occupancy codes and restrictions.** For example, single-family neighborhoods have an existing ordinance that defines family as no more than three unrelated individuals living in the same house. This limits the number of renters per household and infringes on protected classes by requiring landlords to inquire about family and marital status. The net impact is that it decreases the available housing stock where certain residents are legally allowed to live, and may exclude low-income renters from some areas and/or decrease neighborhood diversity.

- **Impediments to mobility.** In response to our survey, several residents commented that they are extremely limited in the neighborhoods where they can live because of affordability. There are few opportunities to move due to few available units at affordable costs, or due to homeowners being underwater with their mortgages, or unable to afford another house in the area due to insufficient equity. Furthermore, the high rates of cost burden means that renters have great difficulty saving up the necessary down payment for a mortgage if they hope to become home owners at some point in the future.
- **Lack of assistance for transitioning from institutional settings to integrated housing.** For many resident who were previously incarcerated or homeless, additional assistance is needed. During our meeting with Homeless Voices, residents related their personal experiences about how having a housing case manager (or landlord liaison) was instrumental to finding and maintaining stable housing. Many landlords and property owners are resistant to renting to these groups, but having an intermediary to help troubleshoot issues as they come up can greatly improve the landlord-tenant relationship. Programs such as this could be expanded to help increase the availability of units for groups transitioning out of institutional settings or homelessness.
- **Lack of affordable in-home or community-based supportive services.** As of May 2017, there were 622 households on a waiting list for housing services, and of those 58% self-reported a mental health or physical disability. Community-based healthcare, addiction support, and mental health services that are affordable is not sufficient to meet the needs, and prospective patients can be turned away if there is not capacity. The consequence can mean that the most vulnerable lose their housing altogether. Service providers report that many residents with the highest needs are placed in housing situations that are not appropriate to their level of need because there is nowhere else for them to go.
- **Lack of public investment in specific neighborhoods, including services or amenities.** Within the next 5-year AFH cycle, the City of Bellingham plans to annex the Alderwood neighborhood (with a population of approximately 2,280 residents). Once annexed, this community will require increased investment in public services and infrastructure, such as parks, streetlights, sidewalks, bikeways, and other improvements – investments which are currently lacking as it is. School district data analysis also show that this neighborhood has a much higher percentage of students receiving free or reduced cost meals (81%) compared to the Bellingham school district average (41%), indicating high levels of poverty among families with children.

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

The following goals were identified and prioritized based on the number of distinct contributing factors (Goal #1 had eight, Goals #2 and #3 had five, and Goal #4 had four contributing factors). Bellingham does not have any R/ECAPS, and levels of segregation remain low. The only relevant

Fair Housing Issues are disparities in access to opportunity and disproportionate housing needs, although these are not strongly correlated with race/ethnicity, disability, family type, or other protected groups at the Census tract level. Because there are few applicable, the Fair Housing Issues are provided in a combined column with Contributing Factors and indicated with italics.

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

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

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

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

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

Goal #1	Contributing Factors & Fair Housing Issues	Metrics & Milestones	Timeline for Achievement
Implement adopted City planning policies through appropriate development regulations that support expanded housing choice and increased inventory	Community opposition Impediments to mobility Land use zoning laws Occupancy codes and restrictions Lack of affordable, accessible housing in a range of unit sizes Lack of public investment in specific neighborhoods, including services or amenities Displacement of residents due to economic pressures Low vacancy rate <i>Disparities in access to opportunity</i>	In preparation for drafting new ordinance(s), City staff will: Review existing Comprehensive Plan policies that support increasing housing choices throughout the community and work with City Administration and Council to prioritize and implement policies. This includes expanded areas for higher density and infill housing forms, and increased housing options within single family neighborhood zones including allowing for more infill development. Re-evaluate the 'family' definition to better reflect the realities of the community, and allow shared housing managed by local nonprofits participating in Coordinated Entry in areas where state licensed group	Review completed by spring 2018. Ordinance(s) brought forward within 2 years (by May 2020) for regulatory changes. A second Housing Levy will be considered by City Council in 2018 for a public ballot measure. Add preference for new housing in low-poverty neighborhoods to the City's future Notices of Funding Availability

	<i>Disproportionate housing needs</i>	homes are currently a permitted use. Continue to encourage production and preservation of affordable housing in upcoming housing levy at the same or higher rate (an average of 60 units/year). Prioritize affordable housing projects that are in neighborhoods with low rates of students on free or reduced cost meals (5% or less) to discourage concentrated areas of poverty	(NOFAs) to the next round of funding
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Discussion

The most common concern expressed at public hearings and in our Fair Housing survey is the lack of affordable housing in Bellingham for those who are low-income as well as middle-income. The limited housing stock has resulted in a very low residential vacancy rate in Bellingham, which means rents continue to rise, reportedly in some cases by as much as \$300 or over 20% in a single year. While rents will likely not continue to climb at such a steep rate over the next AFH period, it is unlikely rental costs will go down. Lack of affordable housing has many consequences. Many renters have very limited housing choice (in housing size, type, and location). Those who are disabled or have special needs, are on fixed incomes, or have housing vouchers are especially limited in their choices. Many residents commented that they hesitate to complain about maintenance problems in their rental units for fear they will lose their housing.

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

Recently updated Comprehensive Plan policies support a variety of housing types and choices.¹¹ These specific policies related to land use and zoning are now under review by the department and appointed/elected representatives, including a review of priorities and implementation measures.

Some Bellingham development regulations may inadvertently exacerbate the shortage of housing options, lack of housing mobility, and socioeconomic segregation. For example, Bellingham's existing municipal code defines a "family" as no more than three unrelated individuals living in the same household, therefore no more than three unrelated individuals are permitted to reside in the same house in single family neighborhoods. To the extent this is enforced, it limits the number of renters per household and infringes on protected classes by expecting landlords to inquire about family and marital status. The potential impact is that it decreases the available housing stock where certain residents are legally allowed to live, and may exclude low-income renters from some areas. It also excludes nonprofit providers of affordable housing from providing

¹¹ See Comprehensive Plan Policies supporting a variety of housing types throughout the community, available at: <https://www.cob.org/Documents/planning/comprehensive-plan/2016-housing.pdf>

shared housing options for their clients. Other ordinances limit multi-family development and infill development.

The combination of the Comprehensive Plan policies supporting housing choice, and some regulations that potentially limit housing choice, has already led to a workgroup convening to study these issues. The additional analysis done through this AFH underscores the importance of this work to expand affordable housing inventory and choices for all. However, it should be noted that there is significant community opposition to rezoning single family neighborhoods for more infill development and density, and for removing the definition of family as no more than three unrelated individuals.

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

Goal #2	Contributing Factors & Fair Housing Issues	Metrics & Milestones	Timeline for Achievement
Examine where the City may want to add protections for people who face housing discrimination	Lack of state or local fair housing laws Lack of resources for fair housing agencies and organizations Regulatory barriers to providing housing and supportive services for persons with disabilities Source of income discrimination Low vacancy rates <i>Disparities in access to opportunity</i>	Analyze City options for protections of additional classes of renters, including those with Section 8 or other housing subsidies, and other options for reducing barriers for renters, including: • prohibiting source of income discrimination, • requiring sufficient notice prior to evictions and rent increases, • prohibiting criminal background checks as part of rental applications.	City Council to consider an ordinance within 2 years.
Discussion During public meetings and in response to our Fair Housing survey, many residents expressed concern that those who receive any kind of government or nonprofit assistance to pay for their housing are being unfairly stigmatized, making it impossible for many to find any housing in Bellingham. Currently, neither Washington State nor City of Bellingham laws prohibit source of income discrimination. Another concern we heard from the community at public meetings was that property owners who are choosing to renovate their properties so they can rent at a higher rate are singling out households who receive housing assistance for no-cause evictions, and tenants frequently have only 20 days notice. In our current tight housing market, where those receiving housing			

assistance are especially restricted in which homes they can rent, this causes a huge amount of stress and disruption.

Another comment received in response to the survey is that a criminal record of any kind can be a huge barrier to attaining housing. Prospective tenants who are employed, but have a record, are not able to find property owners who will rent to them. This increases their vulnerability to homelessness. Other municipalities have prohibited criminal background checks as part of rental applications, and the City of Bellingham would like to study this proposal as well as the others listed earlier. Considering there is a lack of public housing available with long waitlists, and an extremely tight rental housing market, the City would like to consider ways it can remove barriers within the private market.

For public housing, the City will advocate that the Bellingham/Whatcom Housing Authority review its admissions criteria as well, to remove any criteria that may unnecessarily disqualify applicants for publicly supported housing.

City staff need to research these issues including enforcement expectations and work with appointed/elected officials to move implementation forward.

Goal #3	Contributing Factors & Fair Housing Issues	Metrics & Milestones	Timeline for Achievement
Provide education on Fair Housing to renters and tenants as well as property managers and owners to increase public understanding of Fair Housing laws	Access to publicly supported housing for persons with disabilities Lack of affordable, accessible housing in a range of unit sizes Lack of assistance for housing accessibility modifications Lack of local private fair housing outreach and enforcement Private discrimination <i>Disparities in access to opportunity</i> <i>Disproportionate housing needs</i>	The city will support at least two events specifically targeted to property owners/property management companies, and two events targeted to renters. Develop or provide links to existing resources regarding property owner and tenants' rights under Fair Housing laws, and post on City website, distribute at educational events and in public places. Revise the Rental Registration Certificate required to be posted onsite with added information about renter rights, and	The in-person education events will take place through 2020, with additional education needs evaluated at that time. Printed educational materials will be produced and made available by Fall 2018, and will remain available electronically for download for the duration of the AFH timeline. Rental Registration Certificate and informational materials will be developed by Winter 2018-19 and rolled out on the same

		develop informational handouts for distribution at the time of inspection. Coordinate with local colleges to ensure that current students and recent graduates have access to information about their rights and available resources, and develop a plan for effectively disseminating information to student renters.	timeline as rental registration updates. Meet with WWU, Bellingham Technical College, and Whatcom Community College to develop a plan and timeline, to be complete by start of the fall 2018 academic school year.
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Discussion

There is confusion among renters, property owners, and management companies around Fair Housing according to State and Federal law. During the last AFFH period, our first goal was to provide fair housing education and outreach. These efforts were welcomed and well attended, but our fair housing survey and conversations with community groups indicate that more public education is required at this point in time. Feedback we received indicated there might be instances of discrimination against protected classes, such as age, family status, marital status, and disability. For example, several respondents to our survey commented that their service animal or emotional support animal was not allowed, or that high pet deposit fees were charged. HUD prohibits discrimination based on disability, such as reliance on a service animal. It seems that many property owners and management companies are not aware of the specifics of this law, for example if an additional pet deposit can be charged for a service animal versus an emotional support animal. The City would like to enlist the help of fair housing experts, such as those from the Fair Housing Center of Washington, to conduct more trainings and workshops, which are up-to-date with current laws. This training should especially focus on discrimination because of disability, age, family status (having children), marital status, and laws protecting victims of domestic violence, as these are the classes our local knowledge research (survey, public meeting comments) indicated have experienced the most discrimination.

It is also clear that tenants need additional information, especially on their rights, and how to make complaints. For example, many residents at public hearings and in response to our survey reported that property management companies were not prompt or responsive to tenants' complaints of major health and safety issues (e.g., mold, vermin, holes in the floor, no insulation, etc.). Bellingham has already put in place a rental registry and requires an inspection to ensure that rental housing meets specific health and safety standards, but only one complaint of non-compliance has officially been filed since the program in June 2016. Staff will revise the Rental Registration Certificate required to be posted onsite with information about renter rights, and develop informational handouts for distribution at the time of inspection.

93% of survey respondents who said they have faced housing discrimination in Bellingham did not report it. Of those, 41% did not report it because they did not know where to report and 3%

said they did not report because they were unsure as to whether the incident counted as discrimination or not. Between 2012 and 2016, HUD received just 21 complaints from within the jurisdiction of Bellingham, and 71% were closed after a no cause determination. In response to our survey, respondents specifically asked for more information about their rights and where to go for help, especially for those who are not classified as very low income, but still cannot afford legal council (a nonprofit agency in Bellingham provides free legal services to very low income and disabled clients). Clearly, renters need more information on their rights, where to file complaints appropriately (e.g., health and safety versus discrimination), and what constitutes discrimination under the law.

In addition to feedback on the survey, we also received two public comments related to fairness in housing and affordability for college students. While students are not a protected group, they represent a significant number of renters in Bellingham – many of whom are renting for the first time. The City will ensure that we are working in close partnership with our local state college, technical college, and community college to deliver accurate information for students about protections under the Fair Housing Act, as well as other protections for tenants.

Goal #4	Contributing Factors & <i>Fair Housing Issues</i>	Metrics & Milestones	Timeline for Achievement
Provide support and advocacy for households receiving housing vouchers through utilization of landlord liaisons and housing case managers who can advocate on their behalf and provide education	Displacement of residents due to economic pressures Lack of affordable in-home or community-based supportive services Lack of assistance for transitioning from institutional settings to integrated housing Low vacancy rate <i>Disparities in access to opportunity</i>	Fund at least 4 housing case manager and/or landlord liaisons who can aid in identifying new private units. Increase coordination among local housing agencies for more effective tenant advocacy and communication with landlords.	Maintain newly-funded landlord liaison position and support for housing case managers through 2022. Support better coordination in currently-funded positions through modified contract terms and pro-active communication with housing case managers by July 2020.
Discussion For many residents who were previously incarcerated or homeless, additional assistance is needed. During our meeting with Homeless Voices, a local advocacy group made up of Bellingham residents who are formerly homeless, members expressed how having a housing case manager (and/or landlord liaison) was instrumental for them in finding and maintaining stable housing. Many landlords and property owners are hesitant to rent to these groups because they have preconceived ideas about how they will behave, or have had negative experiences in the past. Having an intermediary to help deal with issues as they arise can greatly improve the landlord-tenant relationship. Programs providing housing case management and/or landlord liaison services should be maintained, and if possible, expanded, to help increase the availability			

of units for very low income vulnerable households, and particularly for those transitioning out of institutional settings or homelessness.

Additionally, some comments received through the survey and during community meetings from both property owners and individuals who receive housing assistance requested that there be more education and support for renters on how to take care of a property and interact appropriately with the landlord or property manager. They felt that some renters lack knowledge or skills for how to meet the expectations of a good tenant and neighbor, and could benefit from some targeted training. Attendees at our meeting with Public Housing Residents strongly agreed with this recommendation.

VII. APPENDICES

Appendix A. Fair Housing Survey

Appendix B. HUD-Provided Data Tables

Fair Housing Survey 2017

What is “fair housing”?

Fair housing is a right protected by Federal and State laws. Each resident is entitled to equal access to housing opportunities regardless of race, color, religion, sex, national origin, disability, familial status, marital status, age, or ancestry. The City of Bellingham would like to know about your experience with fair housing and housing choice.

Fair housing choice is defined by HUD as “individuals and families having the information, options, and protections to live where they choose without unlawful discrimination and other barriers related to race, color, religion, sex, familial status, national origin or handicap and that their choices realistically include housing options in integrated areas and areas with access to opportunity.”

About the survey

Please help us to identify any barriers that limit fair housing choice in our community. As a resident of Bellingham, we invite you to take a 5 to 10 minute survey that will help us learn about the issues, set priorities, and make a plan to improve access to housing for everyone.

This Confidential Survey closes on July 31, 2017.

For question options with a circle ☐, please choose just one answer. For questions with a square ☐, please check all that apply.

Housing

1. What neighborhood do you live in? (Choose just one)

- | | | |
|-------------------------------------|--|---|
| ☐ Alabama Hill | ☐ Happy Valley | ☐ South |
| ☐ Alderwood | ☐ Irongate | ☐ South Hill |
| ☐ Barkley | ☐ King Mountain | ☐ Sunnyland |
| ☐ Birchwood | ☐ Lettered Streets | ☐ Western (WWU) |
| ☐ City Center | ☐ Meridian | ☐ Whatcom Falls |
| ☐ Columbia | ☐ Puget | ☐ York |
| ☐ Cordata | ☐ Roosevelt | |
| ☐ Cornwall Park | ☐ Samish | ☐ Outside the City
of Bellingham |
| ☐ Edgemoor | ☐ Sehome | |
| ☐ Fairhaven | ☐ Silver Beach | |

2. Do you own your own home or rent?

- ☐ Own
- ☐ Rent
- ☐ Homeless
- ☐ Other (please specify) _____

3. Please rate the affordability of your home (Rent or Mortgage)

- ☐ I can easily afford my home
- ☐ I pay between 30% and 50% of my monthly income for housing
- ☐ I pay more than half of my monthly income for housing
- ☐ N/A

4. How long have you lived at your current address?

- ☐ 0-1 years
- ☐ 2-3 years
- ☐ 4-7 years
- ☐ 8-15 years
- ☐ 15 + years

5. Have you ever been concerned about eviction or foreclosure?

- ☐ Yes
- ☐ No

Comments: _____

6. What are the most likely reasons you may face eviction or foreclosure? (Check all that apply):

- ☐ Loss of family income/unemployment
- ☐ Unable to refinance home
- ☐ Balloon payment required on mortgage
- ☐ Rent increased too much
- ☐ Someone in my family had big medical bills to pay
- ☐ I don't know why
- ☐ N/A

Other Comments: _____

7. Why do you stay where you live? (Check all that apply)

- ☐ I live near friends/family
- ☐ Rent is affordable
- ☐ Too expensive to move
- ☐ I cannot afford any other area
- ☐ My home is near my work
- ☐ My home is close to schools for my children
- ☐ I like it here
- ☐ I would prefer to live somewhere else
- ☐ Other (please specify): _____

8. How many people live in your household?

Neighborhood

For questions 9, 10 and 11, please mark any number on the number line between 0-100.

9. How do you feel about the neighborhood where you live now?

0 ————— 50 ————— 100
Very bad Neutral Great!

10. How safe do you feel living in your neighborhood?

0 ————— 50 ————— 100
Not safe Neutral Very safe

11. How do you feel about the schools in your neighborhood or community?

0 ————— 50 ————— 100
Very bad Neutral Great!

12. Rate the availability of employment opportunities in or near your neighborhood (circle 1 to 4 stars):

★ ★ ★ ★ ○
Very low Low Good Excellent Don't know

13. Rate the access to services (like hospitals, shops, restaurants, parks) in or near your neighborhood:

★ ★ ★ ★ ○
Very low Low Good Excellent Don't know

14. Rate your access to good transportation options:

★ ★ ★ ★ ○
Very low Low Good Excellent Don't know

15. What kind of transportation do you use the most?

- ☐ Walk
- ☐ Bike
- ☐ Bus
- ☐ Car

16. What changes would you most like to make in your neighborhood? (check all that apply)

- | | |
|--|--|
| ☐ Increase transportation options | ☐ Increase recreational opportunities |
| ☐ Increase job opportunities | ☐ Decrease traffic |
| ☐ Decrease crime | ☐ Other changes (please specify): |
| ☐ Increase opportunities for neighborhood interaction | |

17. Has any hate crime been committed in your neighborhood/community in the last 3 years?

- ☐ Yes
- ☐ No
- ☐ I don't know

18. If YES, what was the hate crime about? (check all that apply)

- | | |
|--|---|
| ☐ Color | ☐ Religion |
| ☐ Creed | ☐ Retaliation |
| ☐ Familial Status/Parental Status | ☐ Sex |
| ☐ Gender Identity | ☐ Sexual Orientation |
| ☐ Disability | ☐ Use of a service animal |
| ☐ Marital Status | ☐ Veteran or Military Status |
| ☐ National Origin | ☐ Source of Income |
| ☐ Race | ☐ Don't know |

Discrimination

Discrimination in housing is anything done to restrict access or availability of housing to someone because of their race, color, religion, sex, disability, familial status, or national origin.

19. Are there any places in Bellingham where you feel you are not welcome to live? Where and why?

20. Have you ever been denied "reasonable accommodation" (flexibility) in rules, policies, or practices to accommodate your disability?

- ☐ Yes
- ☐ No
- ☐ I don't have a disability

If yes, what was your request?

21. Have you ever experienced housing discrimination in Bellingham?

- ☐ Yes
- ☐ No
- ☐ I don't know

If yes, to whom did you report?

If you answered "NO" to question 21, please skip to question 26 on the next page----->

22. Who discriminated against you?

- ☐ landlord/property manager
- ☐ mortgage insurer
- ☐ real estate agent
- ☐ city/county staff person
- ☐ mortgage lender
- ☐ neighbor
- ☐ Other: _____

23. Where did the act of discrimination occur?

	In Bellingham	Somewhere else
Apartment complex	☐	☐
Public or subsidized housing project	☐	☐
Condo development	☐	☐
Trailer or mobile home park	☐	☐
Single-family neighborhood	☐	☐
When applying for city/county programs	☐	☐
Other (please specify)	☐	☐

24. Was the discrimination reported?

- ☐ Yes
- ☐ No

If yes, to whom was it reported?

25. If no, why did you not report the discrimination? (check all that apply)

- ☐ Don't know where to report
- ☐ Afraid of retaliation
- ☐ Don't believe it makes any difference
- ☐ Too much trouble
- ☐ N/A
- ☐ Other (please specify)

26. The recommendations below come from a 2012 analysis of Fair Housing choices in the City of Bellingham. Please rank the items below in order of importance to you, with **1 = most important** and **3 = least important**.

The City of Bellingham should prioritize:

- ☐ Educating the community about Fair housing (including tenants and property owners).
- ☐ Homeownership and lending programs that target minority households.
- ☐ Expanding Fair Housing Policy to include other protected classes not covered by Federal laws (such as gender identity, Veterans, and source of income).

27. Is there anything else about Fair Housing that you would like to tell us?

Demographics

28. What is your race?

- ☐ White
- ☐ Black/African American
- ☐ Asian
- ☐ American Indian or Alaskan Native
- ☐ Native Hawaiian or Other Pacific Islander
- ☐ American Indian or Alaskan Native *and* White
- ☐ Asian *and* White
- ☐ Black/African American *and* White
- ☐ American Indian/Alaskan Native and Black/African
- ☐ American
- ☐ Other Multi-Racial
- ☐ I prefer not to say

29. Is anyone in your household Hispanic or Latino?

- ☐ Yes
- ☐ No
- ☐ Don't Know

30. What is your religion? (optional)

- | | |
|--|---------------------------------|
| ☐ Buddhist | ☐ Muslim |
| ☐ Christian | ☐ Hindu |
| ☐ Jewish | ☐ None |
| ☐ Other (please specify): _____ | |

31. Is anyone in your home considered disabled?

- ☐ Yes
- ☐ No

32. Are you a female head of household?

- ☐ Yes
- ☐ No

33. Approximately what is your annual household income?

34. Are you receiving any federal, state or other monetary assistance?

- ☐ Yes
- ☐ No

35. If yes, please specify the type(s) of assistance below:

- ☐ Child support
- ☐ Food stamps
- ☐ Cash assistance
- ☐ Disability
- ☐ Rental assistance
- ☐ Energy assistance
- ☐ Other

Survey complete

Thank you for completing this survey!

Please return completed copies to:

City of Bellingham
Department of Planning & Community Development
210 Lottie Street
Bellingham, WA 98225

If you have any questions about Fair Housing please call the City of Bellingham, Community Development Division at 360-778-8391.

You can also contact the Fair Housing Center of Washington at 253-274-9523, or visit the Fair Housing Center of Washington website: <https://fhcWASHINGTON.org/>



Table 1 - Demographics

	(Bellingham, WA CDBG, HOME) Jurisdiction		(Bellingham, WA CBSA) Region	
Race/Ethnicity	#	%	#	%
White, Non-Hispanic	53,510	80.45%	164,675	81.87%
Black, Non-Hispanic	904	1.36%	1,789	0.89%
Hispanic	5,072	7.63%	15,756	7.83%
Asian or Pacific Islander, Non-Hispanic	3,577	5.38%	7,447	3.70%
Native American, Non-Hispanic	869	1.31%	5,070	2.52%
Other, Non-Hispanic	145	0.22%	365	0.18%
National Origin	Country		Country	
#1 country of origin	Mexico	1,540 1.90%	Canada	5,959 2.96%
#2 country of origin	Canada	1,418 1.75%	Mexico	4,431 2.20%
#3 country of origin	Vietnam	483 0.60%	India	1,151 0.57%
#4 country of origin	Philippines	427 0.53%	Ukraine	1,151 0.57%
#5 country of origin	India	413 0.51%	Philippines	1,035 0.51%
#6 country of origin	China excl. Hong Kong & Taiwan	330 0.41%	Vietnam	954 0.47%
#7 country of origin	Korea	247 0.30%	China excl. Hong Kong & Taiwan	643 0.32%
#8 country of origin	Russia	222 0.27%	Russia	617 0.31%
#9 country of origin	Ukraine	212 0.26%	Netherlands	539 0.27%
#10 country of origin	England	205 0.25%	England	530 0.26%
Limited English Proficiency (LEP) Language	Language		Language	
#1 LEP Language	Spanish	1,801 2.34%	Spanish	4,603 2.29%
#2 LEP Language	Vietnamese	633 0.82%	Vietnamese	862 0.43%
#3 LEP Language	Chinese	243 0.32%	Russian	836 0.42%
#4 LEP Language	Russian	188 0.24%	Other Indic Language	501 0.25%
#5 LEP Language	German	140 0.18%	Chinese	407 0.20%
#6 LEP Language	Other Indic Language	124 0.16%	Other Slavic Language	312 0.16%
#7 LEP Language	Other Slavic Language	103 0.13%	German	243 0.12%
#8 LEP Language	Japanese	100 0.13%	Tagalog	194 0.10%
#9 LEP Language	Tagalog	93 0.12%	Japanese	178 0.09%
#10 LEP Language	Persian	88 0.11%	Persian	136 0.07%
Disability Type				
Hearing difficulty	2,765	3.64%	8,139	4.28%
Vision difficulty	1,550	2.04%	4,488	2.36%
Cognitive difficulty	4,231	5.57%	10,854	5.70%
Ambulatory difficulty	3,987	5.25%	11,148	5.86%
Self-care difficulty	1,677	2.21%	4,703	2.47%
Independent living difficulty	3,370	4.44%	8,866	4.66%
Sex				
Male	32,725	49.20%	99,635	49.54%
Female	33,785	50.80%	101,505	50.46%
Age				
Under 18	10,110	15.20%	42,205	20.98%
18-64	48,984	73.65%	132,295	65.77%
65+	7,416	11.15%	26,640	13.24%
Family Type				
Families with children	5,461	44.16%	20,676	42.32%

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

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Note 4: Refer to the Data Documentation for details (www.hudexchange.info).

Table 2 - Demographic Trends

	(Bellingham, WA CDBG, HOME) Jurisdiction						(Bellingham, WA CBSA) Region					
Race/Ethnicity	1990		2000		2010		1990		2000		2010	
	#	%	#	%	#	%	#	%	#	%	#	%
White, Non-Hispanic	52,289	92.47%	60,629	86.65%	53,510	80.45%	117,140	91.71%	143,834	86.22%	164,675	81.87%
Black, Non-Hispanic	392	0.69%	929	1.33%	904	1.36%	603	0.47%	1,708	1.02%	1,789	0.89%
Hispanic	1,364	2.41%	3,066	4.38%	5,072	7.63%	3,694	2.89%	8,679	5.20%	15,756	7.83%
Asian or Pacific Islander, Non-Hispanic	1,431	2.53%	3,568	5.10%	3,577	5.38%	2,301	1.80%	6,063	3.63%	7,447	3.70%
Native American, Non-Hispanic	979	1.73%	1,449	2.07%	869	1.31%	3,818	2.99%	5,752	3.45%	5,070	2.52%
National Origin												
Foreign-born	3,893	6.87%	5,910	8.45%	8,088	9.97%	9,933	7.78%	16,342	9.80%	23,214	11.54%
LEP												
Limited English Proficiency	1,328	2.35%	2,350	3.36%	4,127	5.09%	2,942	2.30%	6,076	3.64%	9,471	4.71%
Sex												
Male	27,385	48.34%	34,044	48.65%	32,725	49.20%	63,161	49.44%	82,285	49.33%	99,635	49.54%
Female	29,260	51.66%	35,927	51.35%	33,785	50.80%	64,584	50.56%	84,529	50.67%	101,505	50.46%
Age												
Under 18	11,466	20.24%	13,391	19.14%	10,110	15.20%	31,821	24.91%	41,418	24.83%	42,205	20.98%
18-64	37,358	65.95%	48,100	68.74%	48,984	73.65%	79,699	62.39%	105,978	63.53%	132,295	65.77%
65+	7,822	13.81%	8,480	12.12%	7,416	11.15%	16,225	12.70%	19,418	11.64%	26,640	13.24%
Family Type												
Families with children	5,848	44.69%	4,888	45.72%	5,461	44.16%	14,989	46.08%	15,561	48.04%	20,676	42.32%
Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families. Note 2: Data Sources: Decennial Census; ACS Note 3: Refer to the Data Documentation for details (www.hudexchange.info).												

Table 3 - Racial/Ethnic Dissimilarity Trends

	(Bellingham, WA CDBG, HOME) Jurisdiction			(Bellingham, WA CBSA) Region		
Racial/Ethnic Dissimilarity Index	1990	2000	2010	1990	2000	2010
Non-White/White	19.26	15.54	20.80	23.90	18.56	24.07
Black/White	27.34	14.96	22.87	30.62	20.77	27.09
Hispanic/White	19.28	20.32	25.67	20.49	21.54	26.67
Asian or Pacific Islander/White	17.34	15.18	25.26	20.28	23.15	27.91
Note 1: Data Sources: Decennial Census						
Note 2: Refer to the Data Documentation for details (www.hudexchange.info).						

Table 4 - R/ECAP Demographics

	(Bellingham, WA CDBG, HOME) Jurisdiction		(Bellingham, WA CBSA) Region	
R/ECAP Race/Ethnicity	#	%	#	%
Total Population in R/ECAPs	0	-	0	-
White, Non-Hispanic	0		0	
Black, Non-Hispanic	0		0	
Hispanic	0		0	
Asian or Pacific Islander, Non-Hispanic	0		0	
Native American, Non-Hispanic	0		0	
Other, Non-Hispanic	0		0	
R/ECAP Family Type				
Total Families in R/ECAPs	0	-	0	-
Families with children	0		0	
R/ECAP National Origin	Country		Country	
Total Population in R/ECAPs		0 -		-
#1 country of origin	Null	0 0.00%	Null	0 0.00%
#2 country of origin	Null	0 0.00%	Null	0 0.00%
#3 country of origin	Null	0 0.00%	Null	0 0.00%
#4 country of origin	Null	0 0.00%	Null	0 0
#5 country of origin	Null	0 0.00%	Null	0 0
#6 country of origin	Null	0 0.00%	Null	0 0
#7 country of origin	Null	0 0.00%	Null	0 0
#8 country of origin	Null	0 0.00%	Null	0 0
#9 country of origin	Null	0 0.00%	Null	0 0
#10 country of origin	Null	0 0.00%	Null	0 0

Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 2: Data Sources: Decennial Census; ACS

[Note 3: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

Table 5 - Publicly Supported Housing Units by Program Category

	(Bellingham, WA CDBG, HOME) Jurisdiction	
Housing Units	#	%
Total housing units	29,608	-
Public Housing	504	1.70%
Project-based Section 8	76	0.26%
Other Multifamily		
HCV Program	1,133	3.83%
Note 1: Data Sources: Decennial Census; APSH		
Note 2: Refer to the Data Documentation for details (www.hudexchange.info).		

Table 6 - Publicly Supported Housing Residents by Race/Ethnicity

	Race/Ethnicity							
(Bellingham, WA CDBG, HOME) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	399	81.10%	14	2.85%	41	8.33%	28	5.69%
Project-Based Section 8	66	92.96%	0	0.00%	4	5.63%	1	1.41%
Other Multifamily								
HCV Program	903	84.16%	43	4.01%	67	6.24%	25	2.33%
0-30% of AMI	5,055	81.40%	170	2.74%	350	5.64%	415	6.68%
0-50% of AMI	7,825	75.39%	210	2.02%	575	5.54%	530	5.11%
0-80% of AMI	13,515	79.50%	255	1.50%	1,115	6.56%	720	4.24%
(Bellingham, WA CDBG, HOME)	53,510	80.45%	904	1.36%	5,072	7.63%	3,577	5.38%

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: #s presented are numbers of households not individuals.

[Note 3: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

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

(Bellingham, WA CDBG, HOME) Jurisdiction	Total # units (occupied)	% Elderly	% with a disability*	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children
Public Housing								
R/ECAP tracts								
Non R/ECAP tracts	497	36.57%	64.04%	81.10%	2.85%	8.33%	5.69%	13.13%
Project-based Section 8								
R/ECAP tracts								
Non R/ECAP tracts	74	50.67%	64.00%	92.96%	0.00%	5.63%	1.41%	0.00%
Other HUD Multifamily								
R/ECAP tracts								
Non R/ECAP tracts								
HCV Program								
R/ECAP tracts								
Non R/ECAP tracts	1,125	23.79%	37.92%	84.16%	4.01%	6.24%	2.33%	29.90%
Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.								
Note 2: Data Sources: APSH								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).								

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

Public Housing						
(Bellingham, WA CDBG) Jurisdiction						
Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
Lincoln Square	396	85%	2%	5%	6%	0%
Texas Meadows	108	64%	7%	22%	5%	64%

Project-Based Section 8						
(Bellingham, WA CDBG) Jurisdiction						
Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
Birchwood Manor	38	89%	0%	5%	5%	0%
Catherine May Apts	38	91%	0%	9%	0%	0%

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

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

Note 3: Data Sources: APSH

[Note 4: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

Table 9 - Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	(Bellingham, WA CDBG, HOME) Jurisdiction			(Bellingham, WA CBSA) Region		
Households experiencing any of 4 housing problems*	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	12,815	29,245	43.82%	26,745	69,025	38.75%
Black, Non-Hispanic	145	375	38.67%	274	649	42.22%
Hispanic	1,015	1,655	61.33%	2,240	3,949	56.72%
Asian or Pacific Islander, Non-Hispanic	495	1,195	41.42%	950	2,389	39.77%
Native American, Non-Hispanic	245	545	44.95%	675	1,590	42.45%
Other, Non-Hispanic	390	790	49.37%	659	1,643	40.11%
<i>Total</i>	<i>15,100</i>	<i>33,805</i>	<i>44.67%</i>	<i>31,540</i>	<i>79,245</i>	<i>39.80%</i>
Household Type and Size						
Family households, <5 people	4,820	14,865	32.43%	13,590	42,935	31.65%
Family households, 5+ people	880	1,260	69.84%	2,760	5,670	48.68%
Non-family households	9,400	17,680	53.17%	15,190	30,635	49.58%
Households experiencing any of 4 Severe Housing Problems**	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	7,120	29,245	24.35%	13,355	69,025	19.35%
Black, Non-Hispanic	55	375	14.67%	100	649	15.41%
Hispanic	590	1,655	35.65%	1,353	3,949	34.26%
Asian or Pacific Islander, Non-Hispanic	390	1,195	32.64%	595	2,389	24.91%
Native American, Non-Hispanic	125	545	22.94%	320	1,590	20.13%
Other, Non-Hispanic	245	790	31.01%	389	1,643	23.68%
<i>Total</i>	<i>8,520</i>	<i>33,805</i>	<i>25.20%</i>	<i>16,095</i>	<i>79,245</i>	<i>20.31%</i>

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHAS

[Note 4: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

Table 10 - Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden*	(Bellingham, WA CDBG, HOME) Jurisdiction			(Bellingham, WA CBSA) Region		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	6,500	29,245	22.23%	11,955	69,025	17.32%
Black, Non-Hispanic	35	375	9.33%	80	649	12.33%
Hispanic	405	1,655	24.47%	935	3,949	23.68%
Asian or Pacific Islander, Non-Hispanic	355	1,195	29.71%	515	2,389	21.56%
Native American, Non-Hispanic	120	545	22.02%	215	1,590	13.52%
Other, Non-Hispanic	205	790	25.95%	305	1,643	18.56%
<i>Total</i>	<i>7,620</i>	<i>33,805</i>	<i>22.54%</i>	<i>14,005</i>	<i>79,245</i>	<i>17.67%</i>
Household Type and Size						
Family households, <5 people	1,845	14,865	12.41%	4,915	42,935	11.45%
Family households, 5+ people	105	1,260	8.33%	500	5,670	8.82%
Non-family households	5,680	17,680	32.13%	8,575	30,635	27.99%

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Note 4: Data Sources: CHAS

Note 5: Refer to the Data Documentation for details (www.hudexchange.info).

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

	(Bellingham, WA CDBG, HOME) Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	381	76.97%	80	16.16%	32	6.46%	65	13.13%
Project-Based Section 8	75	100.00%	0	0.00%	0	0.00%	0	0.00%
Other Multifamily								
HCV Program	473	43.12%	393	35.82%	206	18.78%	328	29.90%

Note 1: Data Sources: APSH

[Note 2: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

Table 12 - Opportunity Indicators, by Race/Ethnicity

(Bellingham, WA CDBG, HOME) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	49.15	60.68	59.66	74.79	58.96	58.82	62.13
Black, Non-Hispanic	42.19	60.21	53.04	77.30	62.02	61.45	61.29
Hispanic	39.42	56.68	50.92	76.34	60.22	65.53	63.56
Asian or Pacific Islander, Non-Hispanic	44.79	55.97	54.02	74.62	58.92	60.14	64.87
Native American, Non-Hispanic	39.37	60.15	51.90	75.67	61.22	66.83	60.31
Population below federal poverty line							
White, Non-Hispanic	45.66	62.57	57.46	79.51	63.36	55.52	61.43
Black, Non-Hispanic	38.24	58.42	53.42	80.92	62.81	53.09	65.86
Hispanic	49.09	62.09	60.49	79.55	61.68	55.29	62.94
Asian or Pacific Islander, Non-Hispanic	41.75	61.23	55.12	79.72	63.92	57.51	59.76
Native American, Non-Hispanic	36.54	56.15	44.44	75.07	61.82	69.89	61.75
(Bellingham, WA CBSA) Region	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	54.12	54.93	55.56	61.24	42.33	48.47	73.27
Black, Non-Hispanic	48.40	55.64	53.04	67.39	49.07	53.66	70.08
Hispanic	50.71	53.44	50.27	60.32	41.43	54.25	75.59
Asian or Pacific Islander, Non-Hispanic	51.54	53.62	54.88	65.86	47.40	54.79	72.14
Native American, Non-Hispanic	40.09	40.62	37.05	49.75	33.16	32.87	81.01
Population below federal poverty line							
White, Non-Hispanic	49.11	56.26	52.98	67.80	49.42	50.57	71.23
Black, Non-Hispanic	40.11	55.64	52.11	78.61	59.18	52.83	69.56
Hispanic	47.45	59.06	51.56	68.33	42.63	48.72	74.25
Asian or Pacific Islander, Non-Hispanic	43.48	57.32	52.29	70.31	54.59	54.30	66.69
Native American, Non-Hispanic	38.13	43.47	38.03	57.84	43.30	50.06	76.63

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

[Note 2: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

Table 13 - Disability by Type

	(Bellingham, WA CDBG, HOME)		(Bellingham, WA CBSA) Region	
	Jurisdiction			
Disability Type	#	%	#	%
Hearing difficulty	2,765	3.64%	8,139	4.28%
Vision difficulty	1,550	2.04%	4,488	2.36%
Cognitive difficulty	4,231	5.57%	10,854	5.70%
Ambulatory difficulty	3,987	5.25%	11,148	5.86%
Self-care difficulty	1,677	2.21%	4,703	2.47%
Independent living difficulty	3,370	4.44%	8,866	4.66%

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

Note 2: Data Sources: ACS

[Note 3: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

Table 14 - Disability by Age Group

	(Bellingham, WA CDBG, HOME) Jurisdiction		(Bellingham, WA CBSA) Region	
Age of People with Disabilities	#	%	#	%
age 5-17 with Disabilities	703	0.93%	1,934	1.02%
age 18-64 with Disabilities	5,609	7.39%	13,907	7.31%
age 65+ with Disabilities	3,121	4.11%	9,603	5.04%

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

Note 2: Data Sources: ACS

[Note 3: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

Table 15 - Disability by Publicly Supported Housing Program Category

(Bellingham, WA CDBG, HOME) Jurisdiction	People with a Disability*	
	#	%
Public Housing	317	64.04%
Project-Based Section 8	48	64.00%
Other Multifamily		
HCV Program	416	37.92%
(Bellingham, WA CBSA) Region		
Public Housing	321	55.44%
Project-Based Section 8	75	35.55%
Other Multifamily		
HCV Program	587	35.07%

Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Note 2: Data Sources: ACS

[Note 3: Refer to the Data Documentation for details \(www.hudexchange.info\).](#)