2019 King County Analysis of Impediments to Fair Housing Choice



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INTRODUCTION AND EXECUTIVE SUMMARY

Introduction

Everyone deserves fair access to housing. Discrimination and segregation are deeply engrained in the history of the United States, including King County. Access to housing was historically a key tool to perpetuate segregation, and access to housing will be critical in undoing segregation.

The Civil Rights Act of 1968, Title VIII through IX, or Fair Housing Act, banned discrimination in housing nationwide against certain protected classes. The U.S. Department of Housing and Urban Development's (HUD's) implementation of the Act requires all local governments to affirmatively further fair housing. This means King County must take meaningful actions to combat discrimination, overcome historic patterns of segregation, and foster inclusive communities free from barriers that restrict access to opportunity.

Protected Classes in King County¹

Federal	State of Washington	King County
Race	Sexual Orientation	Age
Color	Gender Identity	Ancestry
National Origin	Creed	,
Religion	Marital Status	
Sex	Veteran/Military Status	
Disability	Use of Service or Assistive Animal	
Familial Status	Source of Income	

This Analysis of Impediments to Fair Housing Choice (Analysis of Impediments) seeks to understand the barriers to fair housing choice and guide policy and funding decisions to end discrimination and overcome historic patterns of segregation in King County.

The King County Department of Community and Human Services (DCHS) conducted this analysis on behalf of the King County Consortium, which includes all of King County with the exception of the cities of Seattle and Milton. While this report includes the City of Seattle, particularly for the analysis of shifting demographics and segregation throughout King County, this analysis does not represent the City of Seattle nor reflect all of its efforts to affirmatively further fair housing. The City of Seattle and Seattle Housing Authority conducted their own Assessment of Fair Housing in 2017.²

This analysis is primarily based on the structure of HUD's 2017 Assessment of Fair Housing Local Government Assessment Tool and the data from the Affirmatively Furthering Fair Housing Data and Mapping Tool³ provided by HUD. More current and

¹ Classes protected by multiple levels of government are listed only at the highest level of government.

² 2017 City of Seattle and Seattle Housing Authority Joint Assessment of Fair Housing.

³ HUD Affirmatively Furthering Fair Housing Data and Mapping Tool.

supplemental data sources are included when appropriate, and the structure modified to improve readability.

Related King County Plans

This analysis incorporates King County's Equity and Social Justice (ESJ) Strategic Plan,⁴ which provides a lens through which all critical King County government decisions are made. The ESJ Strategic Plan creates a framework for how to engage historically underserved communities in examining current conditions and defining equitable solutions.

This analysis is also written in the context of the Regional Affordable Housing Task Force's Five-Year Action Plan and Final Report⁵ and the Affordable Housing Committee. This analysis may inform efforts King County and the Affordable Housing Committee will take to develop model ordinances or provide technical assistance to partner jurisdictions. The Five-Year Action Plan recommends the following strategies that this analysis partially addresses:

- Goal 4, Strategy A: Propose and support legislation and statewide policies related to tenant protection to ease implementation and provide consistency for landlords
 - Prohibit discrimination in housing against tenants and potential tenants with arrest records, conviction records, or criminal history
- Goal 4, Strategy B: Strive to more widely adopt model, expanded tenant protection ordinances countywide and provide implementation support for:
 - Prohibiting discrimination in housing against tenants and potential tenants with arrest records, conviction records, or criminal history
- Goal 5, Strategy B: Increase investments in communities of color and low-income communities by developing programs and policies that serve individuals and families at risk of displacement
 - Expand requirements to affirmatively market housing programs and enhance work to align affordable housing strategies with federal requirements to further fair housing.

⁴ King County Equity and Social Justice Strategic Plan 2016-2022.

⁵ Regional Affordable Housing Task Force Five-Year Action Plan and Final Report.

Executive Summary

This report finds that systemic segregation, disproportionate housing needs, and individual-level discrimination are present and ongoing in King County.

Key findings include:

- King County has become significantly more diverse over recent decades.
- Jurisdictions in King County are categorized within three racial compositions: areas that are diverse, areas that are predominantly White and Asian, and areas that are predominantly White.
- South Seattle and Southwest King County contain the most diverse areas of King County and face the greatest barriers in access to opportunity.
- Economic segregation is a major factor contributing to segregation patterns throughout King County, and protected class status frequently correlates with lower incomes.
- Housing prices have increased dramatically in the last ten years, displacing lowerincome communities of color and immigrants.
- Field-testing conducted across jurisdictions in King County found evidence of individual-level housing discrimination in about half of all tests.
- Black residents of King County are half as likely as White residents to apply for a home loan and twice as likely to be denied.

This report proposes an initial set of goals to overcome these barriers to fair housing choice:

- 1. Invest in programs that provide fair housing education, enforcement, and testing.
- 2. Engage underrepresented communities on an ongoing basis to better understand barriers and increase access to opportunity.
- 3. Provide more housing for vulnerable populations.
- 4. Provide more housing choices for people with large families.
- 5. Support efforts to increase housing stability.
- 6. Preserve and increase affordable housing in communities at high risk of displacement.
- 7. Review zoning laws to increase housing options and supply in urban areas.
- 8. Work with communities to guide investments in historically underserved communities.
- 9. Support the Affordable Housing Committee's efforts to promote fair housing.
- 10. Report annually on Fair Housing Goals and progress.

COMMUNITY PARTICIPATION PROCESS

King County staff solicited input from partner organizations, local jurisdictions and the public on community needs and priorities for the Analysis of Impediments. Staff designed public outreach and engagement activities to reduce barriers to participation and engage stakeholders and community groups underrepresented in the past. King County staff also collaborated with local jurisdictions to help reach more communities and hosted meetings in public places to boost participation. Information on the Analysis of Impediments, the notice of the public meetings, and the availability of a resident survey were widely distributed through targeted outreach with local partners. The draft Analysis of Impediments was available for public review and comment from June 14 to July 26, 2019. The meeting notices and survey tool were available in English, Somali, Spanish, and Vietnamese from June 25 to July 26, 2019.

The Joint Recommendations Committee, which oversees funding decisions for the King County Consortium, reviewed and approved this report at a special meeting on July 12, 2019. In effect, the Consortium approves the report on behalf of all of the cities in King County except Seattle and Milton. The King County Executive then submits this report to the Metropolitan King County Council.

Stakeholders

King County staff invited members of the following organizations to participate in oneon-one interviews to provide feedback during the development of the Analysis of Impediments. Staff also shared the public meetings notice with these organizations and encouraged them to distribute it through their networks.

Housing Providers/Policy Advocates:

- Housing Development Consortium of Seattle-King County
- Housing Justice Project
- King County Housing Authority
- Renton Housing Authority
- Tenant's Union (WA State and City of Kent)
- Washington Multifamily Housing Association
- Washington Realtors

Nonprofit/Community Based Organizations

- African Community Housing and Development
- Alliance of People with disAbilities
- Asian Pacific Islander Americans for Civic Engagement (APACE)
- Asian Counseling and Referral Services
- El Centro De La Raza
- Refugee Women's Alliance (ReWA)
- Skyway Solutions
- Somali Community: Living Well Kent
- Washington State Coalition Against Domestic Violence (WSCADV)
- White Center CDA

Regional Partners

- Columbia Legal Services
- Futurewise
- Puget Sound Sage
- University of Washington Evans School of Public Policy & Governance

King County staff conducted interviews with representatives from the following organizations:

- Alliance for People with disAbilities
- Asian Counseling and Referral Services
- Columbia Legal Services
- University of Washington Evans School of Public Policy & Governance
- King County Housing Authority
- Puget Sound Sage
- Washington State Coalition Against Domestic Violence.

CONSULTATION AND PARTICIPATION



Community Meetings

Public Drop-In Forums

Three public open houses (one in each sub-region) provided an opportunity for residents to give feedback on the Analysis of Impediments and share their concerns and perspectives with King County staff. These meetings followed the federal requirements for providing public notice, providing notice in the Seattle Times newspapers, posting on the King County website, posting notice at the meeting site, and providing direct notification to stakeholders 14 calendar days prior to the first community meeting.

Meetings took place at the following times and locations:

- East Bellevue, June 15, 2019, Crossroads Mall, 11:00 a.m.-1:00 p.m.
- North Shoreline, June 22, 2019, Shoreline Library, 10:30 a.m.-12:30 p.m.
- South Tukwila, June 29, 2019, Tukwila Library, 10:30 a.m.-12:30 p.m.

The community forums were held in mixed–income and low-income locations around King County that are walkable, accessible by public transit and have free parking. The venues included areas frequented by community members of all economic backgrounds, often in areas with subsidized and affordable housing options. The meetings were in publicly accessible locations, without architectural barriers to preclude the attendance of people with a disability. The community meeting held at the Crossroads Mall drew the best attendance, as the location had the most foot traffic and was a good location to talk to people passing by.

<u>Additional Meetings</u>

King County co-hosted two community meetings jointly, one with the City of Auburn and another with the City of Federal Way. Also, an additional stakeholder meeting attended by staff from the Downtown Emergency Service Center, Housing Development Consortium, and Congregations for the Homeless provided an opportunity to discuss and get feedback during work hours. King County staff also briefed the City of Renton Human Services Commission and South King Housing and Homelessness Partners on the process, key findings, and recommendations.

Online Survey

King County staff distributed an online survey to collect information regarding individuals' personal experiences of barriers to accessing housing. The survey was translated into Spanish, Vietnamese and Somali to increase accessibility. By the end of the comment period, 46 participants had submitted responses and comments.

Survey Themes:

- The rental market is challenging for many:
 - o Lack of affordable housing for low-income/fixed-income individuals.
 - Instability of constantly moving due to:

- Annual rent increases that make an area unaffordable.
- Buildings being renovated and displacing residents.
- Living with multiple roommates in crowded conditions to afford area where they want to live.
- Community members settling for sub-quality rental housing in order to manage affordability.
- Housing ownership market is too expensive and unattainable:
 - Older housing is the only option in lower price ranges
 - Newer housing is larger and starts in the \$800K range
 - Prices prevent younger families from moving in and the elderly from staying in their homes in more expensive areas, and the new graduates need to return to live at home
 - Newer housing being built does not incorporate concern for aesthetic or functional neighborhoods and communities; quantity over quality is being valued
 - Frustrated by a lack of market options/configurations; need more multifamily properties
- Need more education about how to report housing discrimination and what tenant rights are when facing fair housing discrimination
- Need more low-barrier, affordable housing options
- Need to protect mobile home parks from development, enabling low-income residents to remain.

Summary of Feedback

Key Themes Highlighted from Public Meetings and Stakeholder Interviews:

- Fair Housing enforcement needs improvements, as the current system relies on the injured party to report discrimination (racism, classism, ableism etc.).
- Certain protected classes (i.e. individuals living with a disability, immigrants with limited English proficiency) experience inherent barriers to accessing housing:
 - Need more accessible units for people with disabilities and policies to ensure units are actually accessible or modified to be accessible.
 - Need more translated materials (forms, websites) and interpreters to help immigrants/refugees access information and apply for housing.
- The impacts of displacement are being felt across the County:
 - Available housing is pricing out low-income individuals.
 - o Evictions are disproportionately impacting women of color.
 - Cost of housing is restricting geographical choice, and forces residents to relocate.
 - Number of people experiencing homelessness continue to increase.
- Immigrant and refugee communities are afraid of government/public entities/organizations.
- Credit scores and social security numbers are being used as "neutral tools" to discriminate against potential tenants.

Recommended Actions Identified by Public Stakeholders:

- Need more accessible, affordable housing and larger capacity units across King County.
- Need to educate landlords/property managers/housing providers on working with tenants with disabilities, with domestic violence survivors and with tenants with criminal records.
- Need a centralized housing database that provides a reference list of available housing programs, resources and available units.

The following chart summarizes the feedback received for each public meeting and interview. This analysis incorporates community feedback beginning with the public review draft first posted on June 14, 2019.

Outreach Affordable Housing experts, stakeholders Individuals with lived experiences of homeless- ness Elected Leaders Business Community Service Providers	response/attendance On July 14, 2017, the Regional Affordable Housing Task Force ⁶ held a kick-off meeting at the Renton Community Center. The meeting included a data presentation on housing affordability and small and large group discussions. About 70 individuals attended. On January 22, 2018, the One Table ⁷ Community Action Work Group meeting brought together elected officials, service providers and individuals with lived experiences of homelessness to discuss the root causes of homelessness and to develop a community approach to preventing homelessness, including improving housing access and affordability.	Comments received See meeting summary. Participants in the affordable housing community action work group identified factors that either decrease or increase the number of housing units affordable and available to King County residents in the lowest income brackets. Priority factors for decreasing affordable housing include rising rent, the cost of housing production, land use and zoning, and permitting time. Priority factors for increasing affordable housing include
Housing experts, stakeholders Individuals with lived experiences of homelessness Elected Leaders Business Community Service	Affordable Housing Task Force ⁶ held a kick-off meeting at the Renton Community Center. The meeting included a data presentation on housing affordability and small and large group discussions. About 70 individuals attended. On January 22, 2018, the One Table ⁷ Community Action Work Group meeting brought together elected officials, service providers and individuals with lived experiences of homelessness to discuss the root causes of homelessness and to develop a community approach to preventing homelessness, including improving housing access and	Participants in the affordable housing community action work group identified factors that either decrease or increase the number of housing units affordable and available to King County residents in the lowest income brackets. Priority factors for decreasing affordable housing include rising rent, the cost of housing production, land use and zoning, and permitting time. Priority factors for
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		expansion of housing types, providing
Broad Community		equal access to affordable units, and increasing financial resources supporting affordable housing.
Communities of Color Broad Community	On January 30, 2018, the Regional Affordable Housing Task Force met at the New Holly Community Center (in New Holly neighborhood operated by the Seattle Housing Authority) for open testimony on the public's experiences of and perspective on housing affordability. 50 residents provided testimony.	See meeting summary.
Individuals with lived experiences of homeless- ness Elected Leaders Business Community Service	On April 4, 2018, the One Table Community Action Work Group meeting brought together elected officials, service providers, and individuals with lived experiences of homelessness to discuss the root causes of homelessness.	Participants in the affordable housing community action workgroup identified strategies including rent control; rental assistance; expanding the Multifamily Tax exemption; using public land for affordable housing; increasing zoning incentives for transit-oriented development, larger units, and accessory dwelling units; increasing tenant protections; removing screening barriers; and increasing funding for affordable housing, among others.
	with lived experiences of homeless- ness Elected Leaders Business Community Service Providers	and perspective on housing affordability. 50 residents provided testimony. Individuals with lived experiences of homelessness Telected Leaders and perspective on housing affordability. 50 residents provided testimony. On April 4, 2018, the One Table Community Action Work Group meeting brought together elected officials, service providers, and individuals with lived experiences of homelessness to discuss the root causes of homelessness. Business Community Service

⁶ Regional Affordable Housing Task Force: Task Force Meetings includes links to the Regional Affordable Housing Task Force meeting summaries and public comments referenced throughout this table.

⁷ See King County's One Table website for more information about One Table.

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received
Public Meeting	Broad Community	On April 19, 2018, the Regional Affordable Housing Task Force Meeting at Kenmore City Hall included small group discussions around specific issues of affordable housing, with groups reporting out to the whole on recommendations. About 50 people participated.	See meeting summary.
Public Meeting	Individuals with lived experiences of homeless- ness Elected Leaders Business Community Service Providers Broad Community	On August 2, 2018, the One Table Community Action Work Group brought together elected officials, service providers, and individuals with lived experiences of homelessness to discuss the root causes of homelessness.	Participants in the affordable housing community action workgroup supported the proposed strategies, but shared skepticism of the proposal in general and that the strategies are insufficient to meet the region's need for affordable housing.
Public Meeting	Broad Community	On September 5, 2018 at Shoreline Community College, the Regional Affordable Housing Task Force presented a draft Action Plan and facilitated discussion about prioritizing goals.	See meeting summary.
Public Meeting	Broad Community	On September 8, 2018 at the South Bellevue Community Center, the Regional Affordable Housing Task Force presented a draft Action Plan and facilitated discussion about prioritizing goals.	See meeting summary.
Public Meeting	Broad Community	On September 11, 2018 at the Auburn Community Center, the Regional Affordable Housing Task Force presented a draft Action Plan and facilitated discussion about prioritizing goals.	See meeting summary.

Mode of	Target of	Summary of	Summary of
Outreach Online	Outreach Broad	response/attendance	See public comments.
Comment Tool	Community	The Regional Affordable Housing Task Force website hosted a public comment tool that allowed residents to share what neighborhood they live in, their experience, and any other perspectives or solutions to address housing affordability.	See public comments.
Public Meeting	Community Meeting in Auburn	On April 1, 2019, King County staff participated in a community meeting organized by the City of Auburn to gather input for their Community Development Block Grant (CDBG) program and countywide housing and fair housing needs.	People expressed a desire to see more affordable housing and fewer barriers to obtaining housing such as tenant screening, selective micro-targeting through social media, discrimination against domestic violence survivors, and rental application fees. Single family zoning was also mentioned as exclusionary and limiting to the housing supply. Permitting processes and regulations were also mentioned as factors constraining supply.
Public Meeting	Broad Community (Bellevue)	On June 15, 2019, King County staff organized a community drop-in opportunity in Bellevue at Crossroads Mall for community members to discuss countywide housing needs, including fair housing needs, and provide public comment on the Consolidated Plan and Analysis of Impediments.	Members of the public expressed a need for more affordable housing options for renters and homebuyers. They shared concerns of their community becoming unaffordable and concerns that employees need to travel farther from work to find housing. They suggested a lack of affordable housing is impacting efforts to help people out of homelessness and leaving people on waitlists longer. Some also expressed concerns that fair housing laws can have unintended consequences and can be complicated for realtors to implement. Residents identified needs for workforce housing, Accessory Dwelling Units (ADUs), and subsidies that provide both housing and cost of living assistance.
Public Meeting	Broad Community (Shoreline/ Lake Forest Park)	On June 22, 2019, King County staff organized a community drop-in opportunity at the Shoreline Library for community members to discuss countywide housing needs, including fair housing needs, and provide public comment on the Consolidated Plan and Analysis for Impediments.	Members of the public shared the fear immigrant communities are feeling to join public meetings and expressed a need for more outreach to immigrant communities. Attendees shared concerns about availability of housing stock and the impact of technology companies' expanding campuses. Residents identified needs for more rental assistance to help keep housing, low-rent apartment stock, resources on what to do when you are experiencing discrimination and better responsiveness to reported discrimination.

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received
Public Meeting	Broad Community (Tukwila)	On June 29, 2019, King County staff organized a community drop-in opportunity at the Tukwila Library for community members to discuss countywide housing needs, including fair housing needs, and provide public comment on the Consolidated Plan and Analysis of Impediments.	Residents shared concerns regarding the impact of evictions and misuse of the eviction process. They also expressed concerns about the growing number of homeless women and homeless veterans and concerns about how affordability is impacting their ability to stay in their preferred neighborhoods. Residents identified needs for: help with planning around credit scores, education, financial planning, and new, accessible homes at affordable prices
Stake- holder Meeting	Partners/ Stake- holders	On July 9, 2019, King County staff organized a community drop-in opportunity for partners and stakeholders to discuss countywide housing needs, including fair housing needs, and provide public comment on the Consolidated Plan and Analysis of Impediments.	Partners shared their concerns that there are not adequate resources for behavioral health treatment, aging in place, or access to adult care homes. Additional concerns included unhealthy housing. Partners shared that the county needs more long-term medical care, education for landlords, long-term subsidized housing, private landlord/rental repair, and fair housing testing and enforcement.
Public Meeting	Joint Recommendations Committee (JRC) Members of the Public	On July 12, 2019, King County staff organized a special meeting of the JRC to review and approve the Consolidated Plan and Analysis of Impediments.	The JRC held a special meeting and heard a presentation on the Consolidated Plan and Analysis for Impediments. Members of the public shared concern for the displacement of immigrants and refugees from their neighborhoods of choice and how that type of displacement has a distinct ripple effect for both the community member that is forced to move and the community left behind.
Public Meeting	Renton Human Services Commission	On July 17, 2019, King County staff briefed the Renton Human Services Commission on the Analysis of Impediments.	Members of the commission shared challenges understanding and complying with Fair Housing laws and were interested in how the City of Renton and King County could collaborate and what actions could be taken with the results of the fair housing testing.

Mode of	Target of	Summary of	Summary of
Outreach	Outreach	response/attendance	comments received
Stake- holder Interview	Alliance of People with disAbilities	On June 24, 2019, King County staff interviewed leadership from Alliance of People with disAbilities.	People who are impacted by a disability need extra support; housing access is unaffordable and inaccessible. Accessible units are rented on first come, first serve basis and not held for tenants with accessibility needs, which increases the wait for units and rigorous search needed for those tenants. Alliance of People with disAbilities acts as a system navigator to help people access services; they work with anyone who states they have a disability. People with disabilities are missing/not reflected by current reports on homelessness, even though they continue to represent a growing part of the homeless population. There is a distinction between Americans with Disabilities Act (ADA) accessible and accessible for a specific individual; some more work is needed on educating housing providers on tenants' rights to have a unit modified to be accessible for them. There is a need for more accessible units and subsidized housing, with a range of options to customize for tenants with disabilities. There is a need for a one stop housing database with all currently available housing and info on housing programs. There is a need for a voice at the table in these processes; there is a problem with the engagement and decision-making process. There is a need for more funding for accessibility work, specifically advocating for tenants with disabilities and educating housing providers. There is a need for more broadly accessible.

Mode of	Target of	Summary of	Summary of
Outreach	Outreach	response/attendance	comments received
Stake- holder Interview	King County Housing Authority (KCHA)	On June 24, 2019, King County staff interviewed leadership and staff at KCHA.	-Market availability and geographic choice present barriers to fair housingLow-income individuals are being priced outQualifying for benefits gets you on the list but not immediate access to benefits: there aren't enough resources to help everyone in needKCHA is working with the City of Seattle on the Creating Moves to Opportunity Pilot to improve outcomes of children by evaluating strategies that support Housing Choice Voucher (HCVs) recipients move to higher opportunity neighborhoodsKCHA is increasing landlord engagement work to build and maintain relationships with local landlords and educate them about HCVsIt is hard for housing authorities to work with undocumented family members because they need to disclose all members in a household to The U.S. Department of Housing and Urban DevelopmentThere has been an increase in intakes of tenants coming directly out of homelessness (40-50%) and demand for Section 8 vouchers is also increasingThere is growing urgency and need for housing resources overallThere is a need for more multifamily housing, affordable home ownership, and concessionary sales prices.

Mode of	Target of	Summary of	Summary of
Outreach	Outreach	response/attendance	comments received
Stake- holder Interview	Washington State Coalition Against Domestic Violence (WSCADV)	On June 27, 2019, King County staff interviewed staff from WSCADV.	-The Washington State Landlord Tenant Act prohibits survivors of domestic violence (DV) from being denied housing on the basis of DV history, but it happens in practice (both by landlords and housing authorities). -There is a lack of understanding on how to work with DV survivors. -Housing providers need improved education on how to work with survivors and what a tenant's rights are for survivors accessing safe housing or vacating housing to be safe (i.e. changing locks, breaking a lease without repercussions, requesting new housing location). -Survivors need navigation to get safe and stable housing. -Eviction and tenant screening reform would help. - The process and timing of housing applications can be a barrier.
Stake- holder Interview	Puget Sound Sage	On June 27, 2019, King County staff interviewed staff from Puget Sound Sage.	-Puget Sound Sage advocates for investments and policies at the state level that seek to protect tenants and promote equitable development, and there has been significant movement in these areas in recent years. -Fair housing barriers include rising housing costs, restricted land use (single family zoning), and rising evictions, which increases displacement and cost of housing. -The City of Seattle's Equitable Development Initiative is a good example of funding to support community-initiated projects in neighborhoods at high-risk of displacement with community engaged in the solution. -There is a need to strengthen affordable housing and use more affirmative marketing and preferential strategies.

Mode of	Target of	Summary of	Summary of
Outreach	Outreach	response/attendance	comments received
Stake- holder Interview	Asian Counseling and Referral Services (ACRS)	On June 27, 2019, King County staff interviewed staff from ACRS.	-Distrust in institutions and availability of interpreters, materials, and forms printed in multiples languages for clients to access are barriers to housing. -ACRS assists clients finding housing and navigating services, but it can take more time and resources due to language barriers. These barriers cause delays, as clients cannot access the information themselves, and ACRS has limited resources to meet the need. -Coordinated Entry for All (CEA) is working well, providing multiple resources in the community to determine needs. The Housing First model has had a positive impact. -There are needs for more translated materials and more interpreters available at housing process, forms etc.
Stake- holder Interview	Columbia Legal Services (CLS)	On June 28, 2019, King County staff interviewed staff from CLS.	-Racism/unacknowledged racism, affordability, types of housing, lack of units, and credit scores as a "neutral test" are barriers to housing. -The existing enforcement model puts the burden on the victim to report discrimination. -Columbia Legal Services works with clients with criminal records on accessing housing. -There is a need for education on many forms of existing housing discrimination (e.g., Social Security Number is not needed but is sometimes requested, which can create a barrier) and increasing access for tenants with disabilities (accommodation vs. modification).
Stake- holder Interview	University of Washington Evans School of Public Policy and Governance	On June 28, 2019, King County staff interviewed Evans School professor Adrienne Quinn.	-Discrimination is ongoing without sufficient enforcement"Ban the box" policies had unintended consequences of discriminating by other proxiesThere is a need for more education around what fair housing is and enforcement against parties who are violating it.

ASSESSMENT OF PAST FAIR HOUSING GOALS

King County participated in a regional Fair Housing and Equity Assessment led by the Puget Sound Regional Council (PSRC) in 2015.8 The following table reviews the goals set in that assessment, policies and programs implemented since 2015 that sought to further these goals, and the results or status towards reaching each goal. This is not a comprehensive list, and King County welcomes input from organizations whose work is not reflected in this assessment. At a high level, governments, nonprofits, and other organizations have made significant progress to achieve many of these goals. However, there has been limited progress to increase fair housing education and enforcement.

	Goal	Activities	Results
I.		Fair Housing Education and Information	า
Α.	Work with regional funding partners and fair housing agency partners to increase the visibility of fair housing enforcement resources.	 The following fair housing and tenant advocacy organizations perform outreach and education of fair housing enforcement resources: Fair Housing Center of Washington The Tenants Union of Washington Information and access to resources are posted on the websites of: King County City of Seattle Washington State Human Rights	Education and access to enforcement resources are available, but community feedback indicates that awareness of enforcement resources is low.
B.	Work with regional funding partners and fair housing agency partners to consider funding	HUD has certified the Fair Housing Center of Washington as a private fair housing enforcement	There have been no targeted enforcement initiatives outside the City of Seattle.

⁸ Puget Sound Regional Council Fair Housing and Equity Assessment.

	Goal	Activities	Results
	specific enforcement initiatives for rental housing in high opportunity areas and high capacity transit areas.	 initiative program.⁹ Fair housing enforcement is available in King County: The U.S. Department of Housing and Urban Development (HUD) enforces federal laws.¹⁰ The Washington State Human Rights Commission enforces state laws.¹¹ Local jurisdiction enforcement programs include: City of Bellevue¹² King County Civil Rights Program (for unincorporated areas)¹³ City of Seattle Office of Civil Rights¹⁴ 	 There is inconsistent capacity across King County for fair housing enforcement. Dispersed and overlapping authority makes accessing resources confusing.
C.	Work with regional funding partners and fair housing agency partners to provide fair housing education and training, including specific education for public and elected officials – assess need for funding for specific educational campaigns.	Information regarding fair housing is available and education has continued through the Fair Housing Center of Washington, the Tenants Union, and Solid Ground, among other organizations. However, King County and partner cities did not fund specific educational campaigns.	Elected officials, housing professionals, renters, and homebuyers are often still not aware of fair housing rights or responsibilities.

⁹ HUD Fair Housing Initiatives Program.

HUD Fair Housing Initiatives Program.
 HUD Office of Fair Housing and Equal Opportunity.
 Washington State Human Rights Commission: Fair Housing.
 City of Bellevue: Code Compliance.
 King County Civil Rights Program.
 City of Seattle Office of Civil Rights: Fair Housing.

	Goal	Activities	Results
D.	Work with regional funding partners and fair housing agency partners to develop new informational materials and publications that will increase participation in the affirmative furthering of fair housing in our region.	Informational pamphlets were distributed at fair housing seminars and available online.	Most of the fair housing materials are outdated.
II.	Landlord/Housing Barriers		
A.	Work with partners, stakeholders, and private landlords to reduce housing screening barriers, including disparate treatment of protected classes and criminal background barriers that have a disparate impact on persons of color.	There has been significant legislative activity in recent years advocating for reducing screening barriers to housing, with a focus on polices that have disproportionate impacts on people of color.	 RCW 43.31.605 created the Washington State Landlord Mitigation Program in 2018.¹⁵ The program provides education and, in some cases, financial support to landlords who rent to tenants receiving rental assistance. In 2015, SHB 1257¹⁶ requires landlords accept a comprehensive reusable tenant screening report, reducing costs for people applying for housing

Washington State Department of Commerce Landlord Mitigation Program.
 Substitute House Bill 1257, 2015.

	Goal	Activities	Results
			multiple times during a housing search. In 2016, ESB 6413 ¹⁷ modified the residential landlord-tenant act provisions relating to tenant screening, evictions, and refunds.
В	Work with partners, stakeholders, and private landlords on initiatives and requirements that will actively promote fair housing choice and increase access to housing for protected classes, including expansion of the Landlord Liaison Project.	 The Landlord Liaison Project was reprogrammed into a larger and broader reaching organization called the Housing Connector. This is a cross collaborative effort between the Seattle Metropolitan Chamber of Commerce, King County, and the City of Seattle. The King County Housing Authority staffs three Owner Liaisons who build relationships with new landlords and strengthen existing partnerships with landlords to encourage participation in the HCV Program. 	 The Housing Connector connects private property owners and managers to those most in need of housing. 18 Since its creation, the Owner Liaison team has helped the HCV program find homes for over 900 new families.
C.	Work with partners to add the coverage of source of	King County and other partners advocated banning source of income discrimination at the Washington	King County ¹⁹ and the Washington State
	income/rental assistance/Section 8	State Legislature.	Legislature ²⁰ banned source of income discrimination in 2018.

<sup>Engrossed Senate Bill 6413, 2016.
Housing Connector.
Ordinance 18708, 2018.
Engrossed Second Substitute House Bill 2578, 2018.</sup>

	Goal	Activities	Results
D.	discrimination at the State level and at the local level for jurisdictions that do not currently include this as a protected class and that have the capacity to administer such a program. Explore other opportunities to reduce barriers to the use of Section 8 and other housing rental assistance. Provide technical assistance to help agencies get their questions answered by the appropriate fair housing professional.	 King County and partner cities do not provide technical assistance. These jurisdictions refer residents to fair housing professionals that provide fair housing education, including: Solid Ground, the Housing Justice Project, and the Tenants Union of Washington State. The Washington State Multifamily Housing Association and Washington Realtors provide references to education and enforcement 	Fair housing professionals continue to provide technical assistance.
III.	resources. Access to Opportunity		
A	In coordination with funding and community partners, make strategic investments in affordable housing in regions of the Consortium that have high access to opportunity.	Since 2015, King County government has committed over \$180 million to affordable housing in high opportunity areas or areas with frequent transit service.	King County has made significant affordable housing investments in affordable housing projects in high opportunity areas.

	Goal	Activities	Results
B.	In coordination with funding partners and community partners, make strategic investments that will catalyze additional public and private investment in regions of the Consortium that have low access to opportunity.	In 2014, Public Health – Seattle & King County began the Communities of Opportunity (COO) program in partnership with the Seattle Foundation. COO seeks to empower residents and communities with low access to opportunity. One of the primary goals of COO is to increase economic opportunity. ²¹	Supporting areas with low access to opportunity has been a priority, but significant disparities persist.
C.	Work across sectors on shared outcomes to increase health, well-being and the vitality of communities located in areas of low access to opportunity.	 Some of the primary goals of COO are to improve health outcomes and community connections.²² The King County Community Health Needs Assessment is a collaborative effort by 11 hospitals and health systems and Public Health – Seattle & King County to identify the greatest needs and assets of the communities they serve and develop plans to address them.²³ 	Significant disparities in health outcomes persist in low-income communities.
D.	Work with partners on legislative matters, incentive programs, and tools that encourage responsible development in areas of low access to opportunity and ensure	Displacement and gentrification were emerging issues during the past five-year planning period. The Regional Affordable Housing Task Force convened elected officials and expert stakeholders, culminating in a Final Report and Five-Year Action Plan. Goal 5 of the Regional Affordable Housing Task Force is to "Protect"	In 2019, the City of Kenmore rezoned its manufactured housing communities to ensure they were not replaced with another housing type.

Communities of Opportunity.
 Communities of Opportunity.
 King County Community Health Needs Assessment.

	Goal	Activities	Results
addro low-i	there are plans to less displacement of ncome persons, if may occur.	 existing communities of color and low-income communities from displacement in gentrifying communities," and includes a number of strategies to achieve this goal.²⁴ The King County Housing Authority has prioritized acquisition and preservation of affordable housing in high opportunity areas where access for low-income persons has historically been limited and in areas at high risk of displacement. Since 2015, the cities of Kirkland, Issaquah, and Shoreline implemented or expanded inclusionary zoning policies to create new affordable housing units or funding. 	King County's 2019-2020 budget included funding for a Transit Oriented Development Preservation and Acquisition Plan. ²⁵

Regional Affordable Housing Task Force Five-Year Action Plan and Final Report.
 TOD Preservation and Acquisition Plan, 2019.

FAIR HOUSING ANALYSIS

Understanding the impediments to fair housing choice requires many levels of analysis.

This analysis includes the following sections:

- Summary of King County demographics and trends.
- Analysis of segregation patterns and trends.
- Analysis of racially and ethnically concentrated areas of poverty.
- Analysis of disproportionate housing needs.
- Analysis of disparities in access to opportunity along the following factors:
 - Education
 - Employment
 - Transportation
 - Environmentally Healthy Areas
- Analysis of publicly supported housing.
- Analysis of housing access for individuals with disabilities.
- Analysis of fair housing discrimination testing and housing mortgage disclosure data.

Each section includes an analysis of the dynamics and disparities for each issue, key contributing factors, and a brief overview of the existing programs and policies seeking to address these issues.

Demographic Trend Summary

King County has experienced significant demographic shifts since 1990 in overall population and makeup by race, ethnicity, and country of origin. King County's population increased from 1,507,319 in 1990 to a 2017 Census estimate of 2,118,119 – an increase of 41 percent. This was significantly greater than the overall U.S. population growth of 30 percent from 1990 to 2017.

Please see Appendix A for a table containing key demographic data for King County as a whole, by each jurisdiction, and for the unincorporated areas.

Race/Ethnicity

King County has become significantly more diverse, with the White, not Hispanic or Latinx, population decreasing from 84.8 percent in 1990 to a 2017 Census estimate of 61 percent. The Asian and Latinx populations grew most rapidly in the same period, increasing from 7.9 percent to 17 percent and from 2.9 percent to 9 percent of the overall population, respectively. The Black population grew from 5.1 percent in 1990 to a 2017 estimate of 6.2 percent. King County's racial and ethnic composition is similar to the larger Seattle-Tacoma-Bellevue Metropolitan area.

National Origin

A major contributor to the growth in King County is immigration from other countries. In 1990, 140,600 residents had a national origin other than the U.S. The 2017 King County estimate is 467,938, an increase of 333 percent compared to 1990. The growth of this population accounts for 54 percent of the overall population growth in King County in this time period. The foreign-born population accounts for 22 percent of the overall population, significantly higher than the national average of 14 percent and similar to the Seattle-Tacoma-Bellevue Metropolitan area.

There is significant variation between jurisdictions for the percent of their population that is foreign-born. The cities with the highest rates are:

Jurisdiction	Percent Foreign-Born	
SeaTac	41%	
Tukwila	40%	
Redmond	40%	

Data Source: U.S. Census Bureau 2017 5-Year American Community Survey (ACS) Population Estimates

The cities with the lowest percentages of foreign-born individuals are:

Jurisdiction	Percent Foreign-Born
Milton	5%
Duvall	6%
Maple Valley	6%

Data Source: 2017 5-Year ACS Population Estimates

Countries of origin with more than 15,000 residents in King County are India, China, Mexico, Vietnam, the Philippines, Korea, Canada, Ukraine, and Ethiopia. More than half of King County's foreign-born population originates from Asia.

Language and Limited English Proficiency

King County residents speak over 170 different languages, and more than a quarter of households in King County speak a language other than English at home. Six percent of King County households have limited English proficiency (LEP). Fifty-five percent of LEP households speak Asian and Pacific Island languages; 20 percent speak Spanish; 16 percent speak Indo-European languages, and 9 percent speak other languages than English.²⁶

The most common languages spoken by K-12 students with LEP in King County are:

Language spoken by LEP students	Number of students in King County
Spanish	26,260
Vietnamese	5,575
Somali	3,786
Mandarin	3,552
Russian	2,543
Cantonese	2,263

Data Source: Washington State Office of Financial Management, Forecasting Division, 2016 estimates

Familial Status

Despite other shifting demographics, household size in King County has remained relatively unchanged. Sixty percent of King County residents live in family households; either married with or without children or single parent households.²⁷ The average household size in King County is 2.5 people. These figures are similar to the United States as a whole.

²⁶ 2016 American Community Survey 1-Year Estimate.

²⁷ King County Office of Economic and Financial Analysis: King County Household Types.

There is significant variation in average household size between jurisdictions within King County.

The cities with the highest average household sizes are:

Jurisdiction	Average Household Size
Algona	3.4
Snoqualmie	3.1
Sammamish	3.0
Duvall	3.0

Data Source: 2017 5-Year ACS Population Estimates

The areas with the smallest average household size are:

Jurisdiction	Average Household Size
Skykomish	1.7
Seattle	2.2
Normandy Park	2.4

Data Source: 2017 5-Year ACS Population Estimates

In addition, the King County Office of Economic and Financial Analysis performs annual demographic trend analysis which is available at its website.²⁸

²⁸ King County Office of Economic and Financial Analysis: Demographic Trends of King County.

Segregation and Integration in King County

Understanding the nature of residential segregation patterns and trends in King County is a critical first step to understanding the barriers to fair housing choice.

Geographically, residential segregation patterns in King County can be categorized as jurisdictions and neighborhoods that are predominantly White, predominantly White and Asian, or racially and ethnically diverse. South Seattle and Southwest King County contain the highest levels of racial and ethnic diversity and are relatively integrated. Urban jurisdictions east of Seattle, such as Bellevue, Redmond, Sammamish and Kirkland are predominantly White and Asian. See Appendix A for race and ethnicity information for each jurisdiction, King County as a whole, and the unincorporated areas of King County.

Non-White residents have moved into urban areas throughout King County over recent decades, which paints an overall positive outlook for racial and ethnic integration in the future. However, as the non-White population is likely to continue to grow, the displacement and shift of the Latinx and Black community into Southwest King County, which are described in more detail in the following sections, present a risk of persistent or increased segregation in the future.

King County's segregation levels vary significantly by race. While Latinx and Asian populations experience similar levels of relatively low segregation, the Black population is highly segregated from the White population. The Dissimilarity Index provided by HUD measures the degree of segregation between two groups. A score of zero would represent complete integration, while a score of 100 would represent complete segregation. According to HUD, a low level of segregation is a score from 0 to 40, moderate segregation is from 41 to 50, and a high level of segregation is above 55.²⁹

Race	Dissimilarity Index
White/Non-White	35.81
Black/White	56.71
Hispanic/White	39.71
Asian/White	36.22

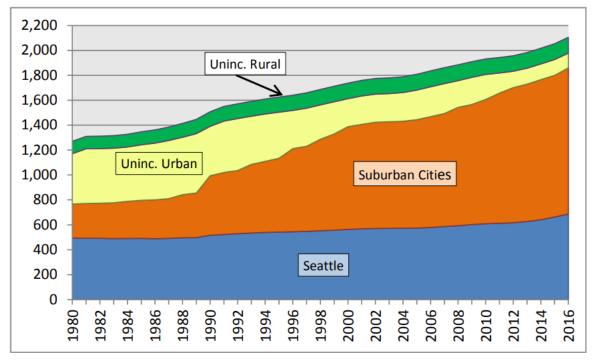
Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, Nov. 2017 Update

Segregation Trends since 1990

In 1990, areas with significant non-White populations were primarily in Central and South Seattle. Over time, the non-White population has expanded and shifted into Southwest King County, with the Asian population also growing significantly in the urban areas east of Seattle. The most segregated areas of King County are those that are predominantly White in the rural areas, which have experienced relatively low population and job growth compared to the urban areas.

²⁹ HUD <u>AFFH Data Documentation</u>, 2013.

Population Change in King County Jurisdictions, 1980-2016



Data source: 2010 Census and ACS

A major factor for why the rural area's population and demographics have changed relatively little is the Growth Management Act (GMA) of Washington State.³⁰ King County established an Urban Growth Boundary in 1992, in accordance with the GMA, and the boundary remains largely unchanged today. This boundary seeks to prevent sprawling and uncontrolled development and targets growth primarily in the western urban areas of King County. The urban areas have accommodated King County's growth in recent decades, while the rural area's demographics remain closer to King County's 1990 demographics. Suburban cities annexed the majority of the urban unincorporated area, which accounts for the significant decrease in population in the urban unincorporated areas.

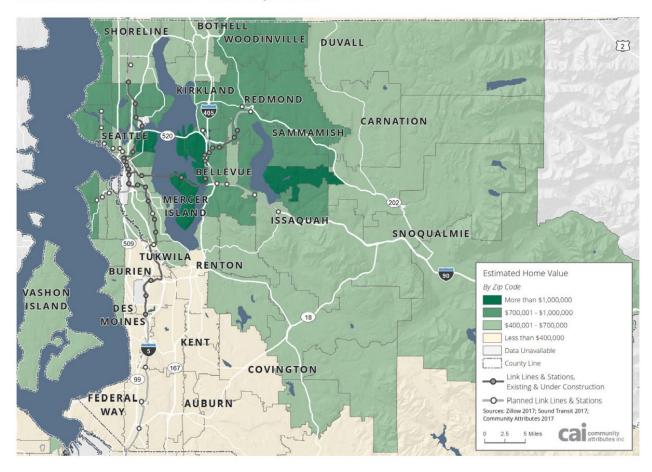
Another segregation trend over recent decades has been income segregation. Middle-income or mixed-income census tracts in the Seattle metropolitan region have decreased from 57 percent in 1980 to 45 percent in 2016.³¹ Economic segregation indexes rate this region as about average or slightly less segregated compared to other metropolitan regions in the U.S. The following map shows the significant variation in home values across King County.

³⁰ Revised Code of Washington 36.70A. See also MRSC: Growth Management Act for a GMA overview.

³¹ King County Housing Authority Meeting of the Board Commissioners "Income Segregation in the Seattle-Metro Region, October 2018," page 140.

As shown in the following maps, since approximately 2013, dramatic increases in the cost of housing have displaced lower-income communities of color farther south in Seattle or into the more affordable areas of Southwest King County. Residents have also been displaced into Kitsap, Pierce and Snohomish Counties, which have historically had more lower-cost housing compared to King County.³² ³³ ³⁴

Estimated Home Value, 2017

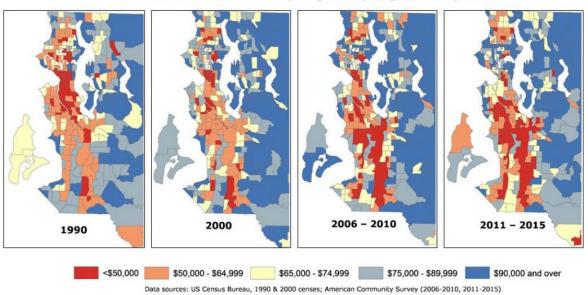


³² Regional Affordable Housing Task Force Five-Year Action Plan and Final Report.

³³ Puget Sound Sage: "Gentrification is underway in Rainier Valley."

³⁴ The Evictions Study.

Median household income by King County neighborhood, 1990-2015



Contributing Factors to Segregation

Race, National Origin and Income

Understanding the strong connection between race and income is critical to understanding segregation trends in King County.

Race/Ethnicity	2017 Median Household Income	Percent of King County Median Household Income
All King County Households	\$83,571	
Asian	\$93,971	112%
White	\$88,638	106%
Two or more races	\$70,046	84%
Native Hawaiian and Other		75%
Pacific Islander	\$62,500	
Hispanic or Latinx	\$57,933	69%
Some other race	\$52,070	62%
American Indian/Alaska Native	\$45,923	55%
Black or African American	\$42,280	51%

Data Source: 2017 5-Year ACS Population Estimates

As the preceding table shows, White and Asian households earn above, while all other races and ethnicities earn significantly below, the King County median income.

Another significant income disparity contributing to segregation trends in King County is between U.S.-born and foreign-born individuals. On average, foreign-born individuals earn \$34,871, while U.S.-born individuals earn \$41,983 in King County.³⁵ The following table shows the median household income for households with at least one foreign-born adult by place of birth. The countries included are those with at least 5,000 King County residents.

The disparities between different places of birth are stark:

Place of Birth	2017 Median Household Income
United Kingdom	\$150,511
India	\$137,966
Canada	\$124,101
Hong Kong	\$113,677
Germany	\$109,406
Taiwan	\$101,574
Japan	\$101,046
China	\$91,070
Philippines	\$90,575

³⁵ 2017 5-Year ACS Population Estimates.

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Russia	\$87,468
Korea	\$81,777
Ukraine	\$75,967
Vietnam	\$72,978
Guatemala	\$65,595
Cambodia	\$55,034
Mexico	\$52,105
El Salvador	\$46,098
Ethiopia	\$39,290
Somalia	\$17,178
l .	1

Data Source: 2017 5-Year ACS Population Estimates

The most striking disparity is with households with an adult born in Somalia, who have a median income below the federal poverty level, depending on household size.³⁶ The preceding table also shows that while Asians as a single category earn above the King County median income, households with adults born in Korea, Vietnam and Cambodia earn less than the King County median income. These income disparities are a major component to why immigrants and low-income people of color have moved into Southwest King County.

Redlining and Racially Restrictive Covenants

Two major institutional factors that have historically contributed to segregation in King County are the practices of redlining and restrictive covenants. Redlining was a practice used by lending institutions to systematically deny financial services to residents of specific neighborhoods, either by outright denial or by raising the price for their services. Restrictive covenants explicitly excluded residents from buying houses in certain areas, typically based on race and religion. These policies restricted access to homeownership opportunities for non-White communities.

Homeownership is an important tool for building future wealth, and parental homeownership significantly increases the chance that their children will buy a home.³⁷ These policies have likely had a major impact on intergenerational wealth and contributed to the systemic disparities identified throughout this report.

The federal Supreme Court ruled against racially restrictive covenants in 1948, and the federal Fair Housing Act of 1968 outlawed both practices. However, their effects are still visible in King County's demographics today. The Seattle Civil Rights and Labor History Project, based at the University of Washington, provides a wealth of information about the history of segregation in King County. This includes information about redlining and racially restrictive covenants, including mapping of both practices.³⁸

³⁶ U.S. Department of Health and Human Services Office of the Assistant Secretary for Planning and Evaluation: HHS Poverty Guidelines for 2020.

³⁷ Housing Finance Policy Center (2018). "<u>Intergenerational Homeownership: The Impact of Parental Homeownership and Wealth on Young Adults' Tenure Choices.</u>"

³⁸ University of Washington: The Seattle Civil Rights and Labor History Project. "Segregated Seattle."

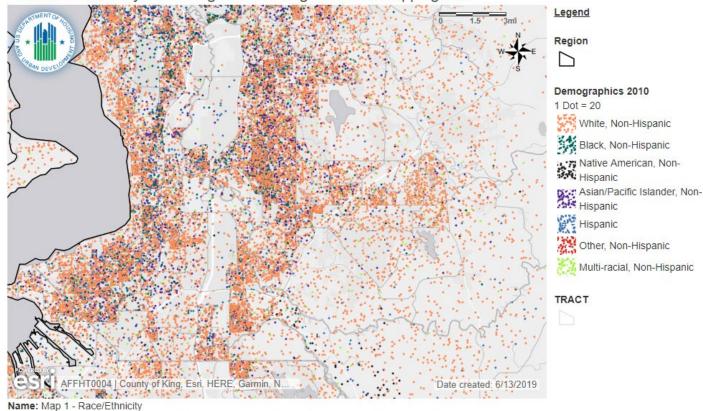
King County's Topography

Another factor that may contribute to racial and ethnic segregation patterns in King County is its topography. Access to and views of Puget Sound, lakes and mountains have a strong influence on housing prices throughout King County. Areas with these assets tend to have a majority White and significant Asian populations. The Latinx and Black populations in King County have significantly lower median incomes. They are therefore less likely to be able to afford housing and live in these areas.

Housing with views or water access can be in close geographic proximity to housing without these assets, Therefore, an area can be diverse from a jurisdictional or neighborhood level of analysis but segregated at a sub-neighborhood or block-by-block level. An example of this trend is seen in predominantly White areas along Puget Sound within the cities of Burien, Normandy Park, Des Moines and Federal Way, which transition to neighborhoods that are less than 50 percent White in distances as short as half a mile. See the next page for a map of the racial and ethnic composition of this area.

Race/Ethnicity Map - Southwest King County





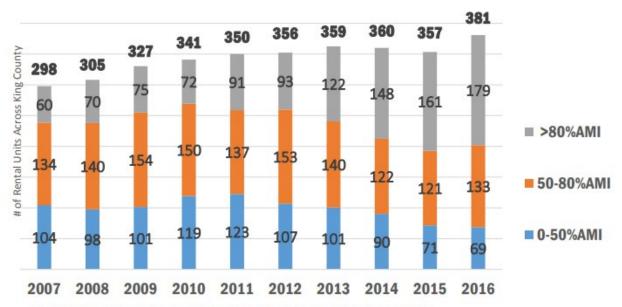
Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, Nov. 2017 Update

Displacement of Residents Due to Economic Pressures

King County has experienced dramatic increases in the cost of housing since the recession of 2008. Even as the overall number of homes has increased in the last ten years by 88,000, the number of rental homes affordable to low- and moderate-income families has decreased by 36,000.

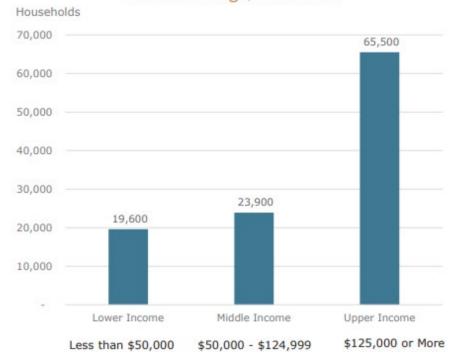
Affordability of Rental Housing Stock by Income Level



Source: McKinsey. American Community Survey Public Use Microdata Sample

This loss in affordable housing is due in large part to significant growth in higher-income households relative to other income groups in King County, as shown in the chart below. Higher-income households are able to pay more for housing they desire, increasing the price of housing and displacing residents to less expensive areas. Households of color are disproportionately likely to be severely cost burdened, paying more than half of their income toward housing costs. These trends have resulted in significant displacement of communities of color from Central and South Seattle into South Seattle and Southwest King County.

Change in King County Households by Income Range, 2006-2016



Data source: 2017 ACS 1-Year Estimates

Location and Type of Affordable Housing

Southwest King County has historically been the area of King County with the most naturally occurring affordable housing, meaning that market rate housing has been affordable to households with lower incomes without significant government subsidies. As a result, residents displaced due to rising housing costs, many of whom are people of color, have relocated to this area. Due in part to its affordability, Southwest King County has also become home to lower-income immigrant communities over recent decades. And, connected to this fast population rise, these areas have also experienced faster rates of growth in housing costs compared to the more costly Seattle and Eastside submarkets.

Land use and zoning laws

Zoning codes significantly limit development in a majority of the urban areas of King County. Areas that allow only lower density development, such as single-family zoning or large minimum lot size requirements, are whiter than the King County average. Limiting the type of housing allowed to single-family homes, which is typically the most expensive form of housing, leads to economic segregation. This economic segregation effectively excludes the low-income communities that are highly correlated with protected class status.³⁹

³⁹ Lens M, Monkkonen P. <u>Do strict land use regulations make metropolitan areas more segregated by income?</u> J Am Plann Assoc. 2016; 82(1): 6–21.

Private Discrimination and Lack of Enforcement of Existing Laws

Community input and housing discrimination testing have found that private, individual-level housing discriminatory practice are still commonplace in King County and present an impediment to fair housing choice.

In addition to federal Fair Housing laws, the State of Washington, King County, and jurisdictions within King County have implemented many policies aimed at reducing discrimination and addressing these disparities. However, funding for monitoring, education, and enforcement of these laws has been limited. Please see the Fair Housing Discrimination section for more information.

<u>Programs, Policies, and Investments to Address Segregation, Fair Housing and Geographic Mobility</u>

Communities of Opportunity

Communities of Opportunity is an initiative undertaken jointly between Public Health–Seattle and King County and the Seattle Foundation to address inequitable outcomes based on geography.

Geographic communities receiving targeted COO funds currently include:

- Rainier Valley (City of Seattle)
- White Center
- SeaTac/Tukwila
- The City of Kent
- Central District (City of Seattle)
- Rural Snoqualmie Valley
- Urban Native Community
- Latinx Community of Vashon Island
- Transgender and gender nonconforming communities

There is significant overlap between these targeted communities and federal protected classes. Each community develops its own vision and priorities for COO efforts, which may include:

- Anchoring multi-cultural communities at risk of displacement.
- Advocating for the preservation and development of affordable housing in areas that are in close proximity to transit, jobs, and education.
- Access to health, affordable food and safe places outside to be physically active, especially for youth.
- Workforce development that includes local hires, support of new local businesses, and inclusion of youth.
- Increased civic participation and engagement, cultural preservation, and access to safe public spaces.

The majority of these efforts seek to empower and improve outcomes for protected classes, which may ultimately lead to greater integration due to economic mobility and mixed-income communities.

King County Housing Authority's Small Area Fair Market Rent Policies

In 2016, KCHA expanded its two-tiered system of payment standards (which involved a regular standard and an "exception area" standard that covered East King County) to create a ZIP code-based, multi-tiered structure with five payment standard levels. 40 KCHA's adoption of multi-tiered payment standards recognizes the importance of closely aligned payment standards to local rental sub-markets as a means of achieving four goals:

- 1. Increasing access to high opportunity areas
- 2. Containing program costs by "right-sizing" subsidy amounts in lower and middle cost markets
- 3. Ensuring that new and existing voucher holders can secure and maintain their housing in competitive and increasingly costly rental submarkets across the County
- 4. Limiting the number of households experiencing cost burden.

An internal assessment completed by KCHA in 2017 found that households were more likely to move to higher opportunity areas after enactment of the policy. Between 2015 and 2016, the proportion of new voucher holders with children leasing in higher cost areas increased by 8.4 percent, movers with children relocating from lower cost to higher cost areas increased by 4 percent, and nearly all racial groups experienced increased access to higher cost areas.

Creating Moves to Opportunity

KCHA is collaborating with the Seattle Housing Authority, MDRC and a multidisciplinary academic team that includes Raj Chetty and others from Harvard University, Johns Hopkins and MIT to identify strategies to increase opportunity area access among families with young children who receive a Housing Choice Voucher. The program, Creating Moves to Opportunity (CMTO), is being run as a multi-year randomized control test study that will test a range of services aimed at reducing rental barriers to opportunity neighborhood access. The end result from CMTO will be best practices that are both impactful and scalable and identified by the research.⁴¹

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⁴⁰ King County Housing Authority: Multi-Tiered Payment Standards Effective January 1, 2020.

⁴¹ Creating Moves to Opportunity.

RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY

Neighborhoods with high concentrations of poverty experience negative outcomes greater than the struggles of an individual family living in poverty. Concentrations of poverty limit educational opportunities and experience increased crime rates and poor health outcomes, less wealth building, lower private-sector investment, higher prices for goods and services, and increased need for local government funds.⁴² It is critical to understand the needs and dynamics that have led to the creation of these areas to understand barriers to fair housing choice.

HUD defines "Racially or Ethnically Concentrated Areas of Poverty" (R/ECAP) as a census tract that is majority non-White and has a poverty rate greater than 40 percent or three times the poverty rate of the metropolitan area.

King County includes only a few R/ECAP tracts. This is due primarily to a relative lack of concentration of poverty and few areas that are majority non-White. There is only one R/ECAP outside the City of Seattle, in the East Hill neighborhood of the City of Kent.

The East Hill R/ECAP tract is 38.5 percent White, 16 percent Black, 1 percent Native American, 22.3 percent Asian and 21.5 percent Latinx, and it scores in the bottom decile of the HUD Poverty Index. This is a significantly higher rate of people of color compared to the King County average. King County had no R/ECAP tracts outside the City of Seattle in 1990. In 2000, another census tract in the City of Kent between I-5 and Pacific Highway South was an R/ECAP with a population that is 46.6 percent White, 17 percent Black, 2 percent Native American, 13.5 percent Asian and 19.8 percent Hispanic.

The City of Kent has historically been an area with naturally occurring affordable housing and has seen a significant amount of growth in the non-White population since 1990. The two R/ECAP tracts identified in this section are near major highways, a former landfill and industrial activities, reducing the value of homes in this area and leading to higher rates of lower-income households.

In 2018, Communities of Opportunity created the Kent Community Development Collaborative – a partnership of community-based organizations working to ensure everyone can participate and benefit from decisions that shape their neighborhood and greater community. ⁴³ The partnership convenes community forums focused on creating affordable, safe housing for Kent residents, opportunities for living-wage jobs and access to healthy, affordable foods.

⁴² HUD Office of Policy Development and Research. "<u>Confronting Concentrated Poverty With a Mixed-Income Strategy.</u>"

⁴³ Kent Community Development Collaborative.

DISPROPORTIONATE HOUSING NEEDS

Achieving fair housing means more than eliminating overt discrimination. This analysis also seeks to understand the disproportionate housing needs of protected classes. The following section analyzes the disparities in housing need in King County.

There are stark disparities among households who are cost burdened and experience housing problems. The four housing problems, as measured by the US Census Bureau, are:

- Incomplete kitchen facilities,
- Incomplete plumbing facilities,
- More than one person per room,⁴⁴ and
- Cost burden.⁴⁵

Race/Ethnicity	Percent of households experiencing at least one housing problem
Hispanic or Latinx	56%
Black	55.9%
Other, Non-Hispanic	43.6%
Native American	38.3%
Asian or Pacific Islander	37.8%
All Households	37.1%
White	33.9%

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, Nov. 2017 Update

There are also significant racial disparities in severe cost burden⁴⁶ that create a disproportionate need for affordable housing for non-White and non-Asian communities.

Race/Ethnicity	Percent Severely Housing Cost Burdened
Black	29%
Some other Race	26%
Hispanic or Latinx	24%
Native American	22%
Native Hawaiian or Pacific	
Islander	22%
White	18%
Asian	18%

Data Source: 2015 Comprehensive Housing Affordability Strategy

⁴⁴ This measure includes all rooms, such as kitchens and living rooms.

⁴⁵ Cost burden is when a household spends more than 30% of its gross income on household costs.

⁴⁶ Severe cost burden is when a household spends more than half of its gross income on household costs.

Geographically, South Seattle and Southwest King County experience the highest rates of cost burden and severe cost burden.

Rental vs. Homeownership Housing

There are significant disparities in the rates of households who rent versus own along race, ethnicity and foreign-born status.

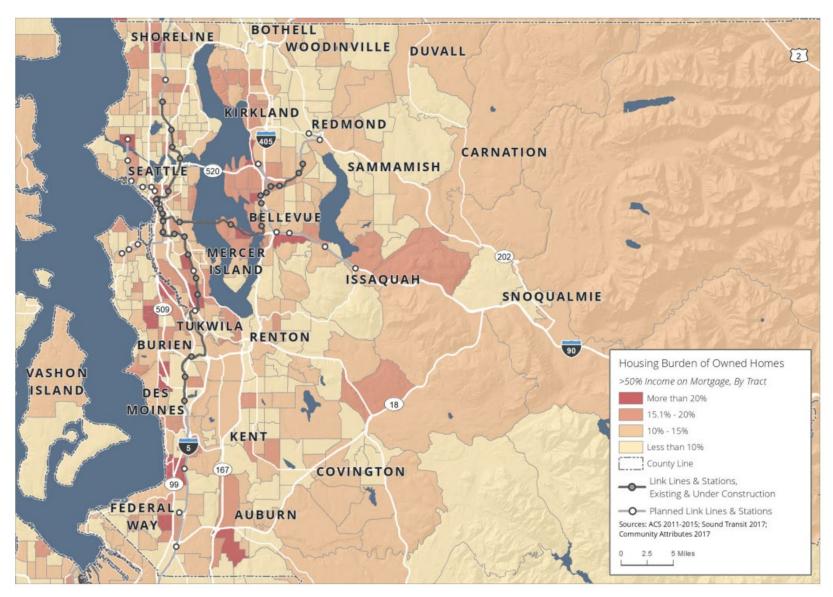
Household Type	Percent of Households who Rent	Percent of Households who Own
All King County Households	43%	57%
Black	72%	28%
Native Hawaiian or Pacific Islander	71%	29%
All other Races	71%	29%
Hispanic or Latinx	66%	34%
Native American	61%	39%
Two or More Races	60%	40%
Asian	42%	58%
White	38%	62%
Foreign Born	50%	50%
U.S. Born	40%	60%

Data Source: 2017 5-Year ACS Population Estimate

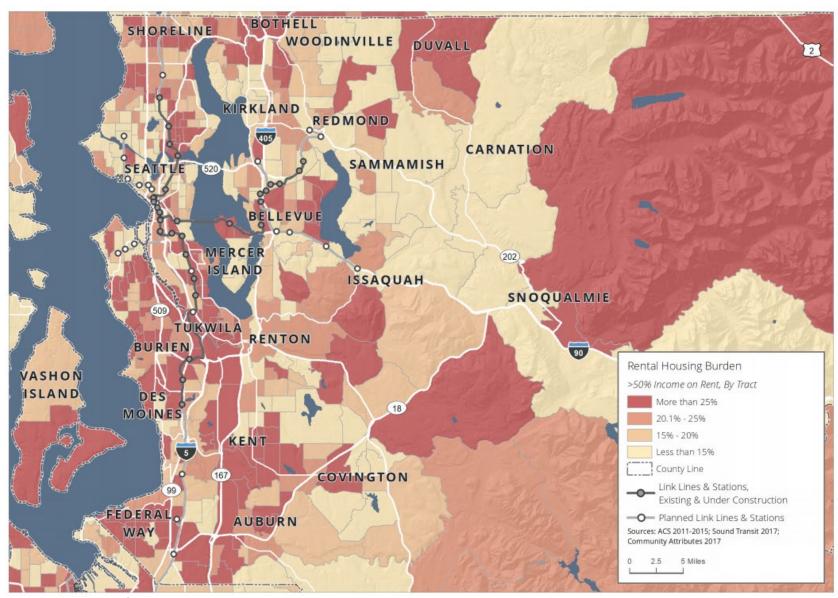
Areas of King County with high rates of rental housing are located primarily in the urban areas both along I-5 and east of Seattle. Within these urban areas, most rentals are located in the areas zoned for higher residential densities. Neighborhoods and jurisdictions composed of single-family homes are therefore more likely to be White and Asian, while denser areas are more diverse.

The following maps describe the percent of homeowners and renters by census tract who are cost burdened. The maps indicate that a majority of the most cost burdened census tracts for renters and homeowners are in South Seattle and South King County.

Homeowner Cost Burden



Renter Cost Burden



King County Analysis of Impediments to Fair Housing Choice

Familial Status

In King County, single individual households are most likely to be cost burdened. This is likely due to paying for housing costs with only a single income, and because younger people are more likely to be single and to earn less as they begin their careers.

However, large families are also significantly more likely to experience housing problems, due primarily to overcrowding and the cost of larger housing. There is significant variation in average household size by country of origin, likely meaning that certain immigrant populations face more substantial challenges obtaining sufficient housing for their families. The following table includes data for countries of birth, for countries with more than 5,000 King County residents.

Place of Birth	Average Household Size
Somalia	4.0
El Salvador	4.0
Mexico	3.9
Guatemala	3.9
Cambodia	3.5
Ukraine	3.5
Philippines	3.3
Vietnam	3.3
Ethiopia	3.0
India	2.8
Hong Kong	2.7
Russia	2.7
China	2.7
Japan	2.6
Korea	2.6
Taiwan	2.6
Germany	2.6
United Kingdom	2.4
Canada	2.4

Data Source: 2017 5-Year ACS Population Estimates

Low-income and immigrant communities have provided consistent input that there is a significant lack of affordable large-unit homes. A review of the publicly subsidized housing inventory in King County found that 27 percent of units are two bedroom and 13 percent of units are three bedroom or larger.

Loss of Affordable Housing

The stock of homes affordable to households earning 80 percent AMI or less has decreased since 2007 and is on a trajectory to continue decreasing. Between 2007 and 2017, the total number of rental units increased by 88,000, but the number of rental units

affordable at 80 percent AMI and below decreased by 36,000.⁴⁷ This is due to a combination of market pressures and the physical demolition of lower cost housing.⁴⁸

Significant growth in population and high-paying jobs in King County, particularly from 2013-2018, has increased the demand for housing, and the market has not built enough new housing to accommodate this growth. Rents have increased dramatically in the last ten years, even in older, previously affordable buildings.

As the urban areas of King County are already largely developed, construction of new housing can lead to a physical loss of existing, lower cost housing. Naturally-occurring affordable housing is often redeveloped when the value of the land is higher relative to the value of the structure. Naturally-occurring affordable housing can also be lost through renovations or remodels that increase the rents of the units.

Language Barriers for Immigrant Households

Limited English proficiency is an additional barrier some immigrant households face in their housing search. Rental postings and applications are typically not readily available in languages other than English. Staff also received feedback about misunderstandings about rights, responsibilities, and protections for residents with limited English proficiency who have secured housing. The need for translation services is therefore a disproportionate housing need for these households.

Difficulty Transitioning from Temporary Cash Assistance for Refugees

Refugees receive eight months of temporary cash assistance upon arrival.⁴⁹ Stakeholder groups reported households experience difficulty finding stable employment and obtaining affordable housing before this assistance expires. Even for refugees with stable employment, establishing a sufficient employment and credit history over that period of time is a significant challenge and presents a barrier to securing housing.

⁴⁷ Regional Affordable Housing Task Force Five-Year Action Plan and Final Report, page 14.

⁴⁸ Regional Affordable Housing Task Force Five-Year Action Plan and Final Report, page 38.

⁴⁹ Washington State Department of Social and Health Services Refugee Cash Assistance.

DISPARITIES IN ACCESS TO OPPORTUNITY

Fair housing choice is not only about combating discrimination. Intergenerational effects of discrimination and segregation have had a disproportionate impact on access to opportunity for protected classes in King County. The following sections summarize disparities; propose contributing factors to these disparities; and review policies, programs, and investments that seek to address these disparities.

Education

Equitable access to a high-quality education is a critical component to addressing intergenerational poverty and providing long-term economic mobility.

Summary of Disparities/Dynamics

The debate over how to measure or compare school proficiency is ongoing and beyond the scope of this analysis. However, the Washington State Office of Superintendent of Public Instruction's "School District Report Card" provides relevant data and shows significant disparities between school districts. The following table provides an overview of how many students are meeting 8th grade state standards, racial and ethnic demographics, and how many students are enrolled in special programs for each of the 19 School Districts in King County.

Overview of School Districts in King County

	Students	nt of 8 th G s Meeting tandards	g State		Race/Eth	nicity De	mographi	cs	Spe	cial Progr	ams
School District	Language Arts	Math	Science	Percent White	Percent Asian	Percent Latinx	Percent Black	Percent Two or More Races	Percent English Learners	Percent Low- Income	Percent with a Disability
Auburn	49.7	38.3	42.5	39.2	8.9	29.7	7.3	9.7	18.9	51.8	12
Bellevue	81.5	73.7	76.9	36.6	39.4	11.8	2.7	9.2	14.6	17.2	9.2
Enumclaw	64.9	53.2	59.9	77.9	0.7	15.3	0.5	4.2	5.8	28.8	17.3
Federal Way	50.1	32.1	36.6	26.9	11.2	29.4	13.9	12.7	21.2	58	14.5
Highline	50.4	33.6	42.1	22	14.5	38.5	14.1	6.1	27.9	62.5	15.9
Issaquah	79.8	77	80.5	53	28.9	8.4	1.9	7.5	6.5	7.8	8.7
Kent	55	42.8	46.8	33.7	19.1	22.6	11.9	9.7	21.1	48.8	11.4
Lake Wash.	82.2	75	78.3	51.9	28	10.3	1.7	7.8	10.1	10.3	11
Mercer Island	83.9	82.5	82.2	63.9	20.9	4.6	0.9	9.5	4	3.2	10
Northshore	79.3	38.3	71.7	57.3	19	12.5	2	8.7	8.1	13.4	13.3
Renton	54.2	45.6	55	26.2	24.9	23.9	14.9	8.6	18	48.2	14.8
Riverview	71.7	55.8	72.2	78.9	3	12.5	0.6	4.5	46	13	11.7
Seattle	68.8	61.6	62.5	47.1	14.1	12.1	14.9	10.8	12.5	31.8	15.1
Shoreline	76	61.7	68.5	53.6	13.2	12.8	7.2	12.3	7.9	25.1	12.5
Skykomish	N<10	N<10	N<10	88.2	0	9.8	0	0	0	89.4	40.4
Snoq. Valley	74.9	70.4	74.1	79.7	6	7.8	0.7	5.8	2.7	8.9	11.9
Tahoma	69.4	66.5	71.4	72.5	4.6	10.2	2.2	9.1	2.6	11.4	13.1
Tukwila	45.4	35.2	49.1	10.9	28.7	29.4	19.8	6.8	37.4	71.9	10.9
Vashon Island	81.1	66.9	72.8	76.3	2.2	12	0.5	8.8	4.8	20.5	12

Data Source: OSPI Washington School Report Card

The data show that school districts in Southwest King County are more diverse, have higher rates of students living in low-income households, and have a higher percentage of students who struggle to meet state standards. The school districts with the highest percentage of students meeting state standards are generally in the areas east of Seattle, which have significantly white and Asian student populations that are less likely to live in low-income households. Notably, the demographics of the student population are significantly less White than the general population, in keeping with the trends of an increasingly diverse King County.

HUD also provides a School Proficiency Index, which measures the likelihood a student in King County of a given race or ethnicity attends a proficient school.

Race/Ethnicity	School Proficiency Index	School Proficiency Index - Households below federal poverty line
White	69.9	60.3
Asian or Pacific Islander	63.9	54.4
Native American	58.6	39.5
Hispanic or Latinx	54.5	51.6
Black	41.2	35.1

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, Nov. 2017 Update

This index shows clear disparities, with the largest disparity between White residents and Black residents. This index also shows that this racial disparity persists both above and below the federal poverty level.

Contributing Factors to Disparities in Access to Education

Local vs. State Funding

Reliance on local funding for schools puts a proportionally greater burden on residents in lower-income school districts, which frequently have more diverse student bodies. The Washington State Legislature recently complied with a State Supreme Court ruling (McCleary v. State of Washington) by increasing school investments at the state level and limiting how much funding can be collected locally and how it can be spent.⁵⁰

Boundaries of School Districts

With some exceptions, school districts in King County generally contain one of the three demographic categories of King County: predominantly White, White and Asian, or racially and ethnically diverse. This leads to racial, ethnic and economic segregation, and limits opportunities for lower-income and non-White students to access the same resources as students living in wealthier areas.

⁵⁰ McCleary, et al. v. State of Washington.

Parent-Teacher Association Funding

Another contributor to disparities between and within school districts is funding and other forms of support provided by Parent-Teacher/Parent-Teacher-Student Associations (PTA/PTSAs). PTA funding perpetuates disparities through intergenerational wealth, as wealthier parents can invest in their children's school or specific programs in the school, bypassing the more redistributive investment patterns of government funding.⁵¹ This funding stream can pay for teacher salaries, supplementary equipment and materials or other investments that can have an impact on student outcomes.

In 2018, KUOW reported that Roosevelt High School, which is located in the Whiter and wealthier area of Northeast Seattle, has the largest PTSA and foundation funding in the Seattle School District with assets of \$3.5 million and annual income of \$225,586. Meanwhile, Rainier Beach, Franklin and Chief Sealth High Schools, which are located in the historically non-White and lower-income area of South Seattle, have no PTSA foundation assets or income.⁵²

<u>Programs, Policies, and Investments Addressing Disparities in Access to Education</u>

King County's Best Starts for Kids Levy

Passed by the voters in 2015, Best Starts for Kids⁵³ seeks to put every child and youth in King County on a path toward lifelong success, funding a number of programs likely to target immigrants and communities of color that:

- Build resiliency of youth and reduce risky behaviors,
- Stop the school-to-prison pipeline,
- Prevent youth and family homelessness, and
- Meet the health and behavioral needs of youth.

Race to the Top

In 2012, the Puget Sound Educational Service District, the Auburn, Federal Way, Highline, Kent, Renton, Seattle and Tukwila School Districts and the King County Housing Authority jointly applied for and received a \$40 million federal Race to the Top grant.

The grant allows the group to expand its programs, which work to:

- Increase the number of children ready for kindergarten,
- Raise instruction quality in math and science,

⁵¹ Center for American Progress, 2017. "<u>Hidden Money: The Outsized Role of Parent Contributions in</u> School Finance."

⁵² KUOW, 2018. "Here's why rich Seattle schools can afford extra teachers and fancy gadgets."

⁵³ Best Starts for Kids.

- Help students plan for career training or college, and
- Provide early intervention for struggling students.

Home and Hope Project

Led by Enterprise Community Partners in conjunction with elected officials, public agencies, educators, nonprofit organizations and housing developers, the Home and Hope project facilitates development of affordable housing and early childhood education centers on underutilized, tax-exempt sites owned by public agencies and nonprofit organizations in King County.⁵⁴

⁵⁴ Enterprise Community Partners Home and Hope Project.

Employment

The geographic distribution of employment centers can result in barriers to opportunity and have a disproportionate impact on low-income communities of color. Longer commutes can have a detrimental impact on an individual's health, from increased stress to exposure to air pollution, and are associated with less physical activity and a poorer diet.

Summary of Dynamics/Disparities

The Labor Market Engagement Index provided by HUD measures the level of employment, labor force participation and educational attainment in a census tract, and it shows disparities by race and ethnicity in King County.

Race/Ethnicity	Labor Market Engagement Index	Labor Market Engagement Index – Households below Federal Poverty Line
White	74.6	64.8
Asian or Pacific Islander	72.5	62.0
Hispanic or Latinx	61.4	55.3
Native American	58.5	47.0
Black	56.4	47.8

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, Nov. 2017 Update

Within the population below the poverty line, White residents are still significantly more likely to live in areas with low unemployment compared to Black residents. The White population is the most likely to live in areas with low unemployment, while the Black population is the least. However, the Native American population living below the poverty line is the group least likely to live in areas with low unemployment.

Based on the HUD mapping tool, there is no clear geographic disparity in access to jobs for protected class groups. The jobs index is strong in the Duwamish and Kent Industrial Valley, which is at the core of the racially and ethnically diverse Southwest King County. The jobs index is also strong in the urban areas east of Seattle.

Contributing Factors to Disparities in Access to Employment

Geographic Segregation of High-Skilled Jobs

A key factor not captured by the HUD Jobs Proximity Index is the nature of the jobs in a given area. King County has hundreds of thousands of high-skill, high-paying jobs at leading corporations in the technology, engineering, health and maritime industries. Boeing has a major facility in Renton, which is accessible to the diverse areas of King County. However, the growing tech sector, which is primarily located in Seattle, Bellevue and Redmond, can be a long commute from Southwest King County.

<u>Programs, Policies, and Investments Addressing Disparities in Access to Employment</u>

King County Investments in Affordable Workforce Housing

The 2019-2020 King County budget included \$100 million in transit-oriented development for affordable workforce housing. These projects will produce hundreds of units that will have access to employment hubs in King County. The King County Housing Authority has also focused on acquiring housing in Bellevue, Redmond and Kirkland to support the workforce in these areas and provide new opportunities for low-income households to live in areas closer to job centers.

King County Employment Programming

King County Department of Community and Human Services provides employment programming for young adults and people with behavioral health conditions.

Transportation

Transportation is a major concern in King County, given its topography and significant growth over recent decades. Transportation is typically the largest household cost after housing and is deeply intertwined with housing cost and access.

Summary of Disparities/Dynamics

The variation in the Low Transportation Cost Index provided by HUD is low, with Native American residents and White residents scoring the lowest, at 71.3 and 72.0. There are more disparities in transit use by race.

Race/Ethnicity	Percentage who commute via transit
White	6.5
Black	9.4
Native American	6.2
Asian	7.8
Hispanic or Latinx	6.4
Two or More Races	6.4

Data Source: 2017 5-Year ACS Population Estimates

Native American residents are least likely, and Black residents are significantly more likely to commute using public transportation. Transit access is generally highest in the City of Seattle and adjacent suburbs, including those in Southwest King County. The relatively lower transit index scores and higher transportation costs for the White and Native American populations is likely due to the rural Muckleshoot reservation and the higher rates of White residents in the rural areas of King County, which have limited transit service.

Contributing Factors to Disparities in Access to Transportation

<u>Transportation Infrastructure Investments</u>

Investments in transit infrastructure have a complicated effect on access to transportation and housing costs for protected classes. Lower-income households are more likely to struggle to afford transportation costs and warrant priority or strong consideration when planning long-term infrastructure investments. However, dramatically improved transit access to an area increases its desirability overall and can increase the cost of housing, creating a risk of displacing the residents the infrastructure was originally meant to serve.

<u>Programs, Policies, and Investments Addressing Disparities in Access to Transportation</u>

Sound Transit Light Rail Expansion and Equitable TOD Policy

Approved by voters regionally in 2016, Sound Transit 3 will dramatically expand the region's light rail network, connecting high and lower opportunity areas across King, Pierce and Snohomish Counties.⁵⁵

Construction of the light rail network requires purchasing storage and staging areas that become surplus once construction is complete. Sound Transit's Equitable TOD Policy⁵⁶ commits to ensuring there is affordable housing in close proximity to transit stations. In 2018 and in accordance with state law, Sound Transit adopted a plan to offer a minimum of 80 percent of its surplus property that is suitable for development to affordable housing.⁵⁷

King County Metro's Orca LIFT Reduced Fare and Equity in Service Planning

King County Metro was the first transit authority to introduce a reduced fare for low-income residents. The program provides up to a 50 percent discount in fares to reduce the burden of the cost of transportation on low-income communities.⁵⁸

King County Metro also incorporates social equity into its long-range service planning, placing an importance on serving historically disadvantaged communities, which are more likely to contain residents who are a protected class. Today, 76 percent of low-income households in King County are within 1/4 mile of a bus stop.⁵⁹

PSRC Growing Transit Communities

In 2010, the Puget Sound Regional Council, in collaboration with 17 community partners, applied for and received a \$5 million Sustainable Communities Regional Planning Grant from the HUD Office of Sustainable Housing and Communities. The grant funded the creation of the Growing Transit Communities Partnership, with a work program intended to address some of the greatest barriers to implementing the central Puget Sound region's integrated plan for sustainable development and securing equitable outcomes. The strategy includes providing housing choices for low- and moderate-income households near transit and equitable access to opportunity for all the region's residents.⁶⁰

⁵⁵ Sound Transit 3 Overview.

⁵⁶ Sound Transit Equitable Transit-Oriented Development Policy.

⁵⁷ Sound Transit News Release, 2018. "<u>Board adopts policy promoting equitable development near transit stations and facilities</u>."

⁵⁸ https://kingcounty.gov/depts/transportation/metro/fares-orca/orca-cards/lift.aspx.

⁵⁹ King County Metro Infographic Sources.

⁶⁰ Puget Sound Regional Council Growing Transit Communities Strategy.

The Puget Sound Regional Council conducted its most recent Fair Housing Assessment in 2014.⁶¹

King County Transit-Oriented Development Investments

In 2016, King County began a five-year competitive Request for Proposal (RFP) process to invest approximately \$87 million in transit-oriented affordable housing projects.⁶² The 2019-2020 King County budget also included \$100 million in transit-oriented development for affordable workforce housing.

⁶¹ Puget Sound Regional Council Fair Housing Equity Assessment, 2014.

⁶² Transit-Oriented Development Bond Allocation Plan, 2016.

Environmental Health

All households deserve access to open space, healthy foods, and toxic-free environments. However, lack of access to those amenities and exposure to environmental hazards has been a chronic issue for low-income communities.

Summary of Disparities/Dynamics

According to the HUD Environmental Health Index, which uses EPA estimates of carcinogenic, respiratory and neurological toxins in the air, there is a significant racial disparity in access to environmentally healthy neighborhoods. A higher score represents greater access to healthy environments.

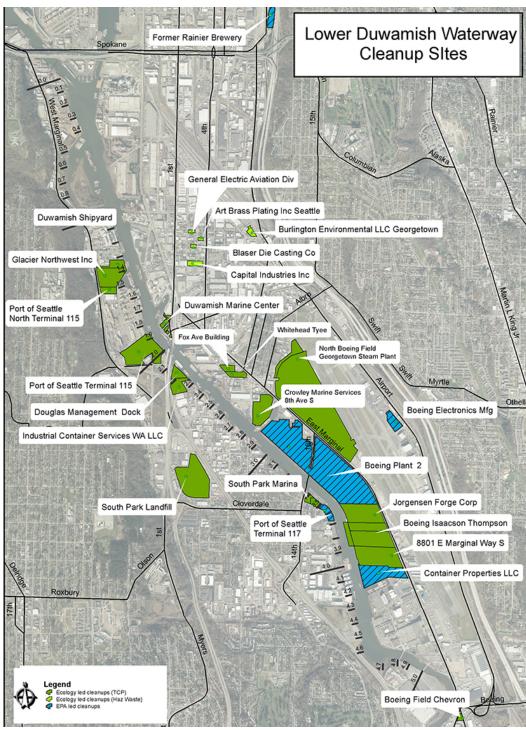
Race/Ethnicity	Environmental Health Index
White	27.0
Black	10.4
Hispanic or Latinx	16.0
Asian or Pacific Islander	17.6
Native American	29.6

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, Nov. 2017 Update

Black residents in King County are the least likely to have access to environmentally healthy neighborhoods. Native American residents have the greatest access on average, slightly higher than White residents, likely due to a greater percentage of Native Americans living in rural areas.

King County contains the lower Duwamish waterway, a Superfund site designated in 2001. Contamination of the river from a number of pollutants occurred over the decades, most notably a significant amount of polychlorinated biphenyls, arsenic, carcinogenic polycyclic aromatic hydrocarbons, dioxins and furans. This makes fishing in the Duwamish, particularly for shellfish and bottom-feeding fish, unsafe. The neighborhoods along the Duwamish house many immigrants and communities of color that have fishing as a component of their way of life or identity, and there has been an ongoing challenge of communicating the risks of fishing in the river to these communities.

⁶³ Duwamish River Superfund Site.

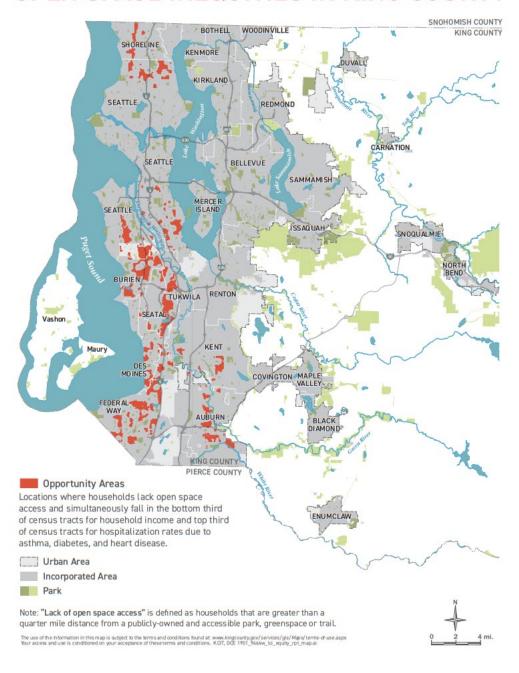


Data Source: Washington State Department of Ecology Toxic Cleanup Program⁶⁴

⁶⁴ Washington State Department of Ecology: Lower Duwamish Waterway.

Approximately 500,000 King County residents do not live within $\frac{1}{4}$ mile of a publicly owned park, green space, or trail. Most of these residents live in Southwest King County.⁶⁵

OPEN SPACE INEQUITIES IN KING COUNTY



⁶⁵ King County Open Space Equity Cabinet Report, 2019.

Lack of access to healthy food options can have negative health outcomes.⁶⁶ Lower-income communities of color are also more likely to live in "food deserts," which are defined as urban areas lacking access to a supermarket within one mile or rural areas lacking access within 10 miles. Again, these areas are primarily located in Southwest King County.

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King County "Food Deserts"

Data Source: USDA Food Access Research Atlas. 67

Contributing Factors to Disparities in Access to Healthy Environments

Environmental Hazards Near or in Lower-Cost Housing

Housing costs are lower in areas adjacent to environmental hazards, industrial zones, airports, and highways and farther from green open space and other amenities that improve health. Lower cost housing is also more likely to be older, which increases the likelihood of asbestos, mold, and lead paint contamination. Because of the deep

⁶⁶ National Academy of Sciences, 2009. "The Public Health Effects of Food Deserts."

⁶⁷ U.S. Department of Agriculture Economic Research Service Food Access Research Atlas.

connection between race and income due to legacies of discrimination, non-White communities are more likely to live in housing with these problems.

Access to Open Space and Healthy Food Options is More Expensive

Housing near amenities that improve health outcomes are desirable and therefore more expensive. Again, because of the deep connection between race and income, non-White communities are less likely to have access to these areas.

<u>Programs, Policies, and Investments Addressing Disparities in Access to Healthy Environments</u>

King County Open Space Equity Initiative

King County convened 21 residents representing 12 different community-based organizations located throughout King County to develop recommendations to ensure more equity in access to green space and open space. They advise the County on how to engage communities and cities to add open space in underserved areas.⁶⁸

Public Health - Seattle & King County Environmental Health Services

Public Health has many programs that seek to address environmental hazards and improve access to environmentally healthy areas.⁶⁹

Environmental Justice Network in Action

The Environmental Justice Network in Action (EJNA)⁷⁰ is a partnership between the Local Hazardous Waste Management Program in King County, community-based organizations, nonprofit groups and government agencies. The EJNA works to:

- Identify the key environmental and health concerns of low income communities, people of color, and immigrant and refugee communities through jointly conducted needs assessments;
- Identify the public engagement strategies that work best for particular populations and share these; and
- Improve the capacity of community based organizations (CBOs), nonprofit groups and government agency partners to design, deliver and evaluate programs and services.

King County Analysis of Impediments to Fair Housing Choice

⁶⁸ King County Open Space Equity Cabinet.

⁶⁹ Public Health Seattle – King County Environmental Health Services.

⁷⁰ Environmental Justice Network in Action.

Conclusion - Disparities in Access to Opportunity

The previous analysis shows that immigrants and communities of color are more likely to live in areas with higher rates of poverty and environmental hazards and fewer economic and educational opportunities. High opportunity areas in Seattle and the urban areas east of Seattle are predominantly White and Asian, while Black and Latinx communities primarily live in Southwest King County, which has less access to opportunity.

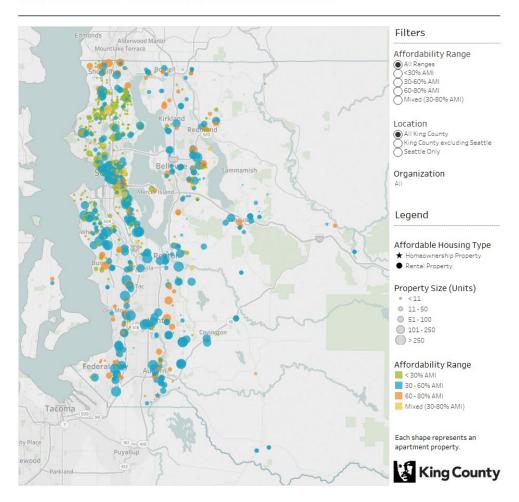
PUBLICLY SUPPORTED HOUSING ANALYSIS

Fair access to, and the location of, publicly supported housing can have major impacts to access to opportunity for protected classes.

Summary of Publicly Supported Housing Disparities/Dynamics

The Seattle, Renton, and King County Housing Authorities collectively operate over 19,000 units and administer tenant-based vouchers for nearly 18,000 households. Other programs support development of additional affordable housing units, such as Low-Income Housing Tax Credits, Multifamily Housing Tax Exemptions, inclusionary housing programs, and other local funding sources. Publicly supported housing is distributed throughout King County's urban areas.⁷¹

AFFORDABLE HOUSING IN KING COUNTY



⁷¹ Map developed in coordination between the Department of Community and Human Services and the Housing Development Consortium of Seattle-King County, 2018.

There are high concentrations of publicly supported housing in the downtown core of Seattle, which is zoned for dense, multifamily development and offers high access to opportunity.

KCHA provided racial demographics of the households who utilize their programs:

Housing Type	Percent White	Percent Black	Percent Hispanic	Percent Asian or Pacific Islander	Percent Native American
Public Housing	53.9	21.0	6.9	19.4	0.6
Project- Based Voucher	48.9	29.7	10.4	15.6	1.2
Tenant- Based Voucher	49.3	39.1	6.4	6.7	1.5

Data Source: King County Housing Authority

Black households are significantly more likely to utilize the Housing Choice Voucher Program than other housing types, while Asians and Pacific Islanders are more likely to utilize public housing, relative to utilization of other housing types. Notably, Hispanic or Latinx households are underrepresented in all categories compared to their overall percentage of the King County population, despite being more likely to be housing cost burdened.

Consistent with HUD policy and guidelines, KCHA seeks to provide access to all members of the community who are eligible for federal housing assistance. This includes eligible members of the immigrant and refugee community, mixed-eligibility families (where assistance is pro-rated based on the number of eligible household members), and U.S. citizens.

Contributing Factors to Publicly Supported Housing Location and Access

Lack of public investment in specific neighborhoods

While publicly supported housing is located in most jurisdictions, many of the highest-opportunity areas of King County have lower rates of publicly supported housing.

Land Use and Zoning Laws

Neighborhoods and jurisdictions in King County that are zoned for single family housing are less likely to contain publicly supported housing, as the majority of public housing developments are multifamily properties. This limits publicly supported housing access in single family zones to recipients of housing choice vouchers.

<u>Programs, Policies, and Investments Addressing Disparities in Location of and Access to Publicly Supported Housing</u>

Housing Authority Planning and Policies

The Seattle, King County, and Renton Housing Authorities consider racial and geographic equity as part of their long-term planning processes. In KCHA's Moving to Work Plan, 72 KCHA's long-term goals include providing greater geographic choice for low income households – including residents with disabilities and elderly residents with mobility impairments – so that residents have the opportunity to live in neighborhoods with high-performing schools and convenient access to services, transit, health services and employment. The 2019 Plan also includes short-term goals regarding broadening geographic choice to support economic and racial integration in the region – through new property acquisitions, creation of family-sized affordable units, and implementing myriad strategies to ensure voucher holders have broad access to units across King County.

The KCHA Board of Commissioners passed a resolution in 2012 that directs staff to strongly consider opportunity area indicators, including education and employment, when acquiring new properties, siting project-based Section 8 subsidies and making other policy and programmatic decisions. Recent policy changes and programmatic decisions have reflected this consideration, including adoption of small area payment standards, the siting of project-based subsidies in high opportunity areas, and piloting of mobility counseling strategies as part of Creating Moves to Opportunity.

The Hispanic and Latinx community have historically been underrepresented in subsidized housing, and KCHA has made efforts to improve access. In the recent opening of the waiting list for the Housing Choice Voucher program, staff made a concerted effort to connect with service providers and organizations with connections to this community. As a result, KCHA serves a large number of immigrants and refugees through Housing Choice and Public Housing programs, a diversity similarly reflected among King County's population.

King County TOD Preservation and Acquisition Plan

King County's 2019-2020 budget included funding set aside for a partnership with KCHA to implement a TOD Preservation and Acquisition Plan. The plan targets affordable housing opportunities either at risk of increased rent or redevelopment or in high opportunity communities.⁷³ KCHA targets the preservation of affordable housing in communities at the highest risk of displacement (including those along emerging transit corridors) and in high opportunity areas characterized by high-performing schools, jobs and transportation. After KCHA purchases a property, rents are only increased as operating costs rise, making these properties increasingly affordable over time.

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⁷² King County Housing Authority Moving to Work Plan, 2019.

⁷³ TOD Preservation and Acquisition Plan, 2019.

DISABILITY AND ACCESS ANALYSIS

While people with disabilities may experience the same fair housing issues as individuals without disabilities, there are also distinct disability-related barriers. For example, some individuals with disabilities may need specific accessibility features or additional services in housing, transportation, education, and other programs or facilities in order to have an equal opportunity.

Summary of Disparities/Dynamics

People with disabilities live throughout King County, with no clear concentration or pattern of segregation. King County and Washington State have made significant strides in supporting people to live in the most independent living arrangement possible and transition out of larger institutions over the last fifty years. The single major institution remaining for people with disabilities in King County is Fircrest Residential Habilitation Center, which houses and provides programming for about 200 individuals.⁷⁴

Disabilities take many forms, and it is important to differentiate the needs of different groups. The following table shows the percentage of King County residents with the different types of disabilities, as measured by the Census Bureau. It is important to note that this table does not include all disabilities, such as behavioral health conditions.

Disability Type	Percent of King County Residents
Hearing Difficulty	3.1%
Vision Difficulty	1.6%
Cognitive Difficulty	3.9%
Ambulatory Difficulty	4.8%
Self-care Difficulty	2.0%
Independent Living Difficulty	3.5%

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, Nov. 2017 Update

Contributing Factors to Disability and Access Issues

Cost of Reasonable Accommodations Increases Likelihood of Discrimination

Providing reasonable accommodation for people with disabilities is more likely to carry a financial burden to a housing provider than providing housing to other protected classes. This increases the likelihood of discrimination. While not a large enough sample to be statistically significant, housing discrimination testing conducted in King County in 2019 found evidence of discrimination in eight out of seventeen tests conducted by people with a disability.

⁷⁴ Washington State Developmental Disabilities Administration: Fircrest Residential Habilitation Center.

Disability as a Barrier to Seeking and Securing Housing

A disability in and of itself can make it difficult to find available housing, tour housing, or submit applications in a timely manner.

Income and Education Gap for People with Disabilities

Nationally, people with disabilities are less likely to work, less likely to work full-time, and are less likely to advance in the education system. People with disabilities who work earn 66 percent as much as people without disabilities who work. In 2015, the disability rate was 16 percent for 25-64 year olds who had not completed high school, compared to 11 percent who had completed high school and four percent who had completed a bachelor's degree.

In 2019, individuals whose primary source of income is a Social Security Disability payment receive a maximum monthly benefit of \$2,861, with a national average of \$1,234. These disparities contribute to people with disabilities being less likely to afford housing.

Complex Network of Resources and Multifaceted Nature of Disability Community

There are dozens of organizations and resources to serve people with disabilities in King County. However, most organizations either provide one type of support or target individuals who live with a certain type of disability. This can make accessing support confusing and difficult. Disability advocates requested a "one-stop shop" that provides an inventory and navigation of all of the resources available for people with each type of disability.

Growing Population of Older Adults

Although age is not a federally protected class for fair housing, it is in King County and correlates with disabilities such as mobility, hearing, vision, and self-care issues. Due to a combination of increasing longevity, declining birthrate, improvements in medical technology and other factors, the population of Americans over age 65 will double over the next 25 years.⁷⁷ Significant investments will be necessary to meet the increasing demand for accessible housing.

⁷⁵ U.S. Census Bureau, 2019. "Do people with disabilities earn equal pay?"

⁷⁶ National Center for Education Statistics, 2017. <u>Disability Rates and Employment Status by Educational</u> Attainment.

⁷⁷ National Center for Chronic Disease Prevention and Health Promotion. <u>The State of Aging and Health in America 2013</u>.

<u>Programs, Policies, and Investments to Address Housing Access for Disabled</u> Individuals

Home Care Services

Many aging and disabled individuals remain in their homes through in-home care. Caregivers may visit or live in the client's home, depending on their needs. Dozens of providers in King County provide these services.

Adult Family Homes

Adult Family Homes, located throughout King County and provided by a number of housing providers, offer housing resources for disabled individuals.

Publicly Supported Senior Housing

Publicly supported housing projects that target seniors are a large percentage of King County's public housing portfolio. The Veterans, Seniors, and Human Services Levy include funding for affordable housing specifically for older adults. Low-Income Housing Tax Credit projects also frequently build housing targeted to older adults.

Housing Accessibility Modification Program

King County's Housing Repair Program serves renters with disabilities who require modifications to their unit.⁷⁸

Moving Toward Age Friendly Housing in King County

King County, the City of Seattle, and other partners undertook an effort in 2018 to understand the needs of the aging population and make recommendations to increase access to affordable housing for older adults. Key recommendations include:

- Increase the supply of affordable housing that meets the needs of a diverse, aging population;
- Create accessible housing that meets the needs of a diverse, aging population.⁷⁹

⁷⁸ King County Housing Repair Program.

⁷⁹ Washington State University Metropolitan Center for Applied Research and Extension: oving Toward Age-Friendly Housing in King County.

FAIR HOUSING DISCRIMINATION DATA ANALYSIS

Laws banning housing discrimination are insufficient if housing providers do not comply. This section reviews data regarding discrimination against protected classes.

Housing Discrimination Testing

Community and stakeholder input reported that despite being illegal for over 50 years, individual-level discrimination in applications for rental housing remains a systemic issue. King County and the cities of Auburn, Bellevue, Burien, Federal Way, Kent, and Renton collaborated to conduct field-testing to collect data on the nature and extent of housing discrimination in King County.

King County and partner cities Auburn, Bellevue, Burien, Federal Way, Kent, and Renton contracted with the Fair Housing Center of Washington to conduct at least 65 differential treatment tests and 15 policy tests in multiple jurisdictions in King County. Differential treatment tests are two-part, in which a member of a protected class and a control tester apply for the same housing. Policy tests ask housing providers direct questions about their policies, such as accommodation for a disabled individual or willingness to rent to families with children. A "positive" result is a test that found evidence of discrimination.

The Fair Housing Center of Washington tested for the following protected classes:

- Race
- National Origin
- Religion
- Disability
- Familial Status

The final report provided by the Fair Housing Center of Washington reported positive test results in 34 out of 66 differential treatment tests and seven positive results out of 16 policy tests. These results are troubling and indicate that protected classes continue to face barriers to fair housing choice. Please see Appendix B for a copy of the final testing report.

Housing Mortgage Disclosure Act Data

Fair access to financing for homeownership is a critical component of housing choice, and a major potential barrier. This analysis reviewed 2016 and 2017 summary data provided by the Consumer Financial Protection Bureau that tracks the outcomes of applications for mortgages for primary residences in King County by race. This data set does not include applicants' income, the size of the loan applied for, or other relevant factors that influence approval or denial of a loan and is therefore not proof of individual-level racial discrimination on its own. There are, however, troubling disparities.

Race	Percent of primary residence home loan applications denied
White	5.7
Asian	7.2
Black	11.6
Hawaiian or Pacific Islanders	6.5
Native American	9.8

Data Source: Consumer Financial Protection Bureau⁸⁰

Black households are more than twice as likely to be denied a loan as White households. Native American households are also significantly more likely to be denied a loan than White households. It is also notable that Black applicants accounted for only 2.8 percent of mortgage applications, despite being 6 percent of the King County population. This reflects earlier analysis regarding the racial disparities for rental and homeownership rates. County staff must conduct further outreach and analysis to understand the dynamics contributing to these disparities.

⁸⁰ U.S. Consumer Financial Protection Bureau.

FAIR HOUSING GOALS

Informed by community input and this analysis, this section proposes a set of priority actions to achieve fair housing choice in King County in the context of the programs, policies, and plans that seek to eliminate barriers to fair housing choice.

- 1. Invest in programs that provide fair housing education, enforcement, and testing.
- 2. Engage underrepresented communities on an ongoing basis to better understand barriers and increase access to opportunity.
- 3. Provide more housing for vulnerable populations.
- 4. Provide more housing choices for people with large families.
- 5. Support efforts to increase housing stability.
- 6. Preserve and increase affordable housing in communities at high risk of displacement.
- 7. Review zoning laws to increase housing options and supply in urban areas.
- 8. Work with communities to guide investments in historically underserved communities.
- 9. Support the Affordable Housing Committee's efforts to promote fair housing.
- 10. Report annually on Fair Housing Goals and progress.

CONCLUSION

This report analyzes access to fair housing choice along a number of factors, provides information on past and current efforts, and sets initial goals for future policies and investments. This report will serve as a resource to guide and inform policy and funding decisions. It is an important step toward ending discrimination and undoing historic patterns of segregation in King County.

Appendix A: King County Demographics by Jurisdiction

	Т	1	Average	<u> </u>	IX A: King Co	I	l l		ı	I	I	I	
	Total	Total	Household	White		Black	I	Native American	Percent Native	Asian		Hawaiian/PI	Percent
Jurisdiction	Population			Population	Percent White		Percent Black		American		Percent Asian		Hawaiian/PI
City of Algona	3,171		3.40	_			5%	_	1%	_	10%		0%
City of Auburn	77,440	+	2.74	 	68%		5%	1,701	2%		10%	+	3%
Town of Beaux Arts Village	342		2.74	<u> </u>	92%	+	0%	1,701	0%		6%		0%
City of Bellevue	139,014	. 	2.50	<u> </u>	56%	<u> </u>	3%	370	0%	<u> </u>	34%	ļ	0%
City of Black Diamond	4,378	+	2.60	<u> </u>			0%	}	2%	L	4%	 	0%
City of Bothell	44,082		2.62	<u> </u>	72%	\$	2%	{	1%		14%	<u> </u>	0%
City of Burien	50,729		2.73	31,449	62%		7%	{	1%		12%		1%
City of Carnation	1,808		2.81	1,674	93%	+	1%	010	0%		3%	 	0%
City of Clyde Hill	3,231	1,128	2.86	<u> </u>	77%	<u> </u>	1%		0%	}	17%	<u> </u>	0%
City of Covington	19,918		2.84	}	74%		5%	55	0%	}	11%		0%
City of Des Moines	31,080		2.64	18,266	 		7%	j	0%		13%		3%
City of Duvall	7,683		2.96	6,952	90%	+	3%	154	0%	198	3%		0%
City of Enumclaw	11,670	+	2.50		84%		2%	91	1%	}	1%		0%
City of Federal Way	94,905		2.73	<u>}</u>			11%	694	1%		15%	+	2%
Town of Hunts Point	423		2.73	<u> </u>			0%	 	0%		17%		2% 0%
City of Issaquah	35,629		2.75	24,816	79%		4%	7	0%	 	20%		0%
City of Kenmore	22,154		2.45	17,714	80%	4	4% 2%	62	0%		12%	<u> </u>	0%
City of Kent	126,561	43,509	2.91	65,873	52%		11%	1,673	1%		20%	2,204	2%
City of Kirkland	86,772		2.40	<u>}</u>	77%	\$	11%	 	0%		14%	+	0%
City of Lake Forest Park	13,247	5,194	2.40	<u> </u>	81%	\$	2%	{	0%	<u> </u>	9%		0% 0%
		+	2.93		83%		!		 		+		
City of Maple Valley	25,375	8,656 1,175	2.93	21,031	73%	+	2% 1%	148	1% 0%		6% 20%		0% 0%
City of Medina City of Mercer Island	3,217 24,768		2.74	2,352 18,554	75%		1% 2%	8	0%		19%		0%
-	ļ		2.45	6,563	88%		0%		ļ		3%		1%
City of Milton City of Newcastle	7,481	3,051	2.45	<u> </u>	63%			17	0% 0%	f	29%		0%
City of Normandy Park	11,346 6,634	4,284 2,807	2.36	7,103 5,990	90%		3% 0%	12	0%		29% 8%		0%
City of North Bend			2.78	<u> </u>	86%		1%	0	0%		1%	!	
•	6,645	÷	2.78	ļ			1% 4%	<u> </u>	<u> </u>	<u> </u>			0%
City of Pacific City of Redmond	7,113 60,712		2.48	<u>}</u>		<u> </u>	2%	 	1% 0%	}	34%		4% 0%
City of Renton	99,692	+	2.59			 	10%	537	1%		22%	4	2%
City of Sammamish	62,877	20,855	3.01	42,060		4	1%	78	0%		27%		2% 0%
City of Seatac	28,597	÷	2.90	<u> </u>			23%	[1%		16%		2%
City of Seattle	688,245	÷	2.30	ļ	69%	+	7%	 	1%		14%		0%
City of Shoreline	55,431	+	2.19	<u> </u>			6%	3,799 611	1%		14%	+	0%
Town of Skykomish	101		1.68			 	8%	 	0%		4%	+	0%
City of Snoqualmie	12,944		3.10	<u> </u>			0%	28	0%	<u> </u>	12%		0%
City of Tukwila	20,025		2.81	<u> </u>		<u> </u>	17%	}	1%		24%		2%
City of Woodinville	11,675	+	2.46	}			1/%	 	0%		11%	+	0%
Town of Yarrow Point	1,184		2.46	<u> </u>			1% 0%	{	0%		11%		
King County Total	2,118,119		2.75	<u> </u>		+	6%		1%		17%	<u> </u>	0% 1%
		+	!	<u> </u>			<u> </u>	!	<u> </u>				
Unincorporated King County	243,333	89,155	2.73	181,255	74%	11,835	5%	2,481	1%	26,459	11%	1,721	1%

Data Source: 2017 ACS 5-Year Population Estimate

	1	Percent	I	l	Hispanic or	Percent	White, Not	Percent	<u> </u>	<u> </u>	I	I	Percent HHs
	Other Races	Other	Multiracial	Percent	Latinx	Hispanic or	Hispanic		Foreign Born	Percent	Percent Cost	Percent Severe	earning
Jurisdiction	Population	Races	Population	Multiracial	Population	Latinx	Population		Population	Foreign Born	Burdened	Cost Burdened	<80% AMI
City of Algona	283	9%	144	5%	609	19%	1,903	60%	789	25%	48%	20%	53%
City of Auburn	3,177	4%	6,378	8%	11,185	14%	46,073	59%	15,031	19%	37%	15%	47%
Town of Beaux Arts Village	4	1%	4	1%	4	1%	310	91%	32	9%	37%	17%	14%
City of Bellevue	2,856	2%	6,696	5%	10,063	7%	71,100	51%	52,871	38%	31%	14%	29%
City of Black Diamond	250	6%	81	2%	446	10%	3,589	82%	318	7%	29%	16%	44%
City of Bothell	1,951	4%	2,954	7%	4,673	11%	29,448	67%	8,819	20%	33%	14%	34%
City of Burien	4,970	10%	3,217	6%	12,342	24%	25,491	50%	12,046	24%	41%	19%	53%
City of Carnation	0	0%	58	3%	280	15%	1,398	77%	183	10%	35%	12%	39%
City of Clyde Hill	0	0%	131	4%	62	2%	2,455	76%	667	21%	29%	16%	19%
City of Covington	506	3%	1,279	6%	1,423	7%	14,090	71%	2,290	11%	29%	12%	28%
City of Des Moines	3,411	11%	2,360	8%	5,670	18%	16,540	53%	6,687	22%	37%	16%	50%
City of Duvall	59	1%	{	3%	517	7%		85%	 	6%	25%	9%	{
City of Enumclaw	754	6%		5%	1,436	12%		80%	}	9%	35%		
City of Federal Way	6,452	7%		8%	17,181	18%	45,518	48%	}	25%		19%	
Town of Hunts Point	1	0%		3%	4	1%		79%	ţ	18%		23%	21%
City of Issaquah	817	2%		4%	3,043	9%		65%		24%	4	14%	29%
City of Kenmore	315	1%	{	5%	1,687	8%		75%	!	17%	↓	14%	32%
City of Kent	9,244	7%		6%	20,152	16%	 	46%	<u> </u>	30%	÷	17%	
City of Kirkland	1,657	2%		5%	6,108	7%	<u> </u>	73%		22%	\$	14%	29%
City of Lake Forest Park	250	2%		6%	712	5%		78%		12%	33%	14%	29%
City of Maple Valley	341	1%		8%	1,432	6%		79%	 	6%	28%	7%	
City of Medina	18	1%		6%	96			70%	<u> </u>	21%	32%	15%	15%
City of Mercer Island	152	1%	j	4%	732	3%		72%	}	19%		16%	23%
City of Milton	98	1%	f	4%	558	7%		82%		5%	35%	13%	(
City of Newcastle	107	1%		5%	401	4%		60%		29%	27%	12%	20%
City of Normandy Park	38	1%	 	1%	251	4%	5,761	87%	645	10%	28%	12%	32%
City of North Bend	526	<u> </u>		5%	<u> </u>	13%		*		11%	<u> </u>	<u> </u>	
City of Pacific	356		<u></u>	9%	 	20%	<u> </u>	56%	\$	13%	\$	\$	
City of Redmond	992	+		5%		8%		53%	†	40%	+	†	4
City of Renton	6,961	7%		8%	13,642	14%		46%		29%	38%		4
City of Sammamish	357	1%		4%	2,463	4%		64%	!	26%		!	!
City of Seattle	2,015	7%		8%	5,225	18%	<u> </u>	32%	!	41%	*	}	
City of Seattle	15,155	+		7%		6%		65%	ţ	18%		÷	
City of Shoreline	1,902	3%	4	5%	5,276	10% 0%		65% 85%	 	20%		‡	4
Town of Skykomish	0	0%		3%	{			÷	!	10%		ŧ	
City of Snoqualmie	59 1 575		<u> </u>	5% 11%	!	3% 15%		78%	<u> </u>	12%	<u> </u>	<u> </u>	_
City of Tukwila	1,575	+		11%	3,007	15%			}	40%	+	}	
City of Woodinville	57	0%		4%	361	3%		81%		13%	4	\$	
Town of Yarrow Point	72.620	0%		4% 6%	200 545			77%		19%	+		15%
King County Total	73,630	3%		6%	200,545	9%		61%	!	22%		!	
Unincorporated King County	6,708	3%	13,171	5%	19,992	8%	171,262	70%	37,034	15%	30%	13%	31%

Appendix B: Housing Discrimination Testing Final Report



Final Testing Report for King County

This document is a summary report of the Fair Housing Center of Washington's results of the contract. A spreadsheet with the total number of tests completed, the name, city and subregion of the test site, protected classes tested, type of test (policy, differential treatment), and test results is included in the final report packet.

As of May 31, 2019, the Fair Housing Center of Washington completed eighty-two (82) tests, of which forty-three (43) were negative and thirty-nine (39) were positive. The violations observed during this contract were either differential treatment based on a protected class status or discriminatory policies that placed additional barriers to housing due to a person's inclusion in a protected class. For tests indicating differential treatment violations, the FHCW recommends additional testing to determine if there is a pattern of differential treatment based on a protected class. For tests indicating one or more discriminatory policies, the FHCW recommends a technical letter advising the test site to correct their policies so that they adhere to fair housing laws. For either type of fair housing violation, the FHCW may pursue enforcement of fair housing laws if a pattern of discrimination is determined.

Of the thirty-nine (39) positive tests, thirty-two (32) had recommendations for additional testing for differential treatment based on a protected class.

Row Labels	Negative	Positive	Grand Total
No further action recommended	43	0	43
Additional testing recommended	0	32	32
Technical letter recommended	0	7	7
Grand Total	43	39	82

As of May 31, 2019, the Fair Housing Center of Washington completed sixteen (16) policy check tests, of which seven (7) were conducted in the North/East subregion and nine (9) were conducted in the South subregion of King County.

Subregion	Negative	Positive	Grand Total
North / East	4	3	7
South	5	4	9
Grand Total	9	7	16

Of the sixteen (16) policy check tests, four (4) tested for willingness to grant reasonable accommodations to persons with a disability, and eleven (11) tested for willingness to accept alternative sources of income, including housing vouchers (Section 8) and maternity leave.

Protected Basis	Negative	Positive	Grand Total
Reasonable Accommodations	1	3	4
Source of Income – Housing Voucher	5	4	9
Source of Income – Maternity Leave	2	0	2
Income & Reasonable Accommodation	1	0	1
Grand Total	9	7	16

As of May 31, 2019, the Fair Housing Center of Washington completed sixty-six (66) differential treatment tests, of which thirty-four (34) were conducted in the North/East subregion and thirty-two (32) were conducted in the South subregion of King County.

	Negative	Positive	Grand Total
North/East	16	18	34
South	18	14	32
Grand Total	34	32	66

Of the thirty-four (34) differential treatment tests conducted in the North/East subregion, sixteen (16) were negative and eighteen (18) were positive, including:

North/East	Negative	Positive	Grand Total
Disability	7	5	12
Familial Status	2	3	5
National Origin	1	2	3
Race	4	4	8
Religion	2	4	6
Grand Total	16	18	34

Of the thirty-two (32) differential treatment tests conducted in the South subregion, fourteen (14) were positive, including:

South	Negative	Positive	Grand Total
Disability	1		1
Familial Status	6	3	9
National Origin	5	6	11
Race	1	3	4
Religion	5	2	7
Grand Total	18	14	32

Of the sixty-six (66) differential treatment tests conducted, fourteen (14) were conducted via email, twenty-one (21) were conducted via phone calls, and thirty-one (31) were conducted via site visits.

Contact Type	Negative	Positive	Grand Total
Email	7	7	14
Phone	12	9	21

Site	15	16	31
Grand Total	34	32	66

Of the thirty-one (31) site differential treatment tests, five (5) tests were conducted in Auburn, six (6) were conducted in Bellevue, one (1) was conducted in Burien, five (5) were conducted in Federal Way, five (5) were conducted in Kent, and one (1) was conducted in Renton.

City	Negative	Positive	Grand Total
Auburn	2	3	5
Bellevue	3	3	6
Burien	0	1	1
Federal Way	2	3	5
Kent	4	1	5
Renton	0	1	1

Of the five (5) site, differential treatment tests conducted in Kent, one (1) was based on disability, one (1) was based on familial status, one (1) was based on national origin, one (1) was based on race, and one (1) was based on religion.

Protected Basis (Kent)	Negative	Positive	Grand Total
Disability	1	0	1
Familial Status	1	0	1
National Origin	0	1	1
Race	1	0	1
Religion	1	0	1
Grand Total	4	1	5

In sum, the Fair Housing Center of Washington observed thirty-nine (39) positive violations of Fair Housing law throughout King County during the contract period. Additional testing as well as sending of technical letters are both recommended to 1) further identify potentially systemic barriers to fair housing, 2) make violators aware of their actions and 3) bring said violators into compliance with Fair Housing law. In addition, increased fair housing education, including annual fair housing training throughout the county may help to combat instances of discrimination, for both new and seasoned property managers, leasing agents and other actors in the housing space.

KING COUNTY ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE:

2020 Progress Report on Actions to Affirmatively Further Fair Housing

The 2019 King County Analysis of Impediments to Fair Housing Choice sets ten goals for the King County Consortium to affirmatively further fair housing. These include:

- 1. Invest in programs that provide fair housing education, enforcement, and testing.
- 2. Engage underrepresented communities on an ongoing basis to better understand barriers and increase access to opportunity.
- 3. Provide more housing for vulnerable populations.
- 4. Provide more housing choices for people with large families.
- 5. Support efforts to increase housing stability.
- 6. Preserve and increase affordable housing in communities at high risk of displacement.
- 7. Review zoning laws to increase housing options and supply in urban areas.
- 8. Work with communities to guide investments in historically underserved communities.
- 9. Support the Affordable Housing Committee's efforts to promote fair housing.
- 10. Report annually on Fair Housing Goals and progress.

This report describes a selection of 2020 King County investments and initiatives that further these goals. Fing County has designed its new programs and investments to reduce barriers in access to housing, mitigate inequitable impacts, and welcome and engage diverse perspectives into decision making processes. With this equity lens, the County is investing tens of millions of dollars to increase housing stability and permanently affordable housing, working with residents to identify strategies and investments to implement in historically underserved communities, and planning for long-term growth.

King County Eviction Prevention and Rental Assistance Program

Advances Goal 5

Department of Community and Human Services (DCHS) staff estimate that approximately 60,000 King County residents are at increased risk of eviction because of the direct and indirect impacts of ongoing COVID-19 pandemic.² In response, King County created a new \$43 million Eviction Prevention and Rental Assistance Program to assist households economically impacted by COVID-19 by providing direct rent assistance and eviction prevention services. The program addresses disparities in housing stability by:

- prioritizing a portion of funds to serve households in ZIP codes with the highest rates of unemployment, COVID deaths, and COVID incidence rates which often coincide with concentrations of people of color and immigrant populations;³
- contracting for outreach and assistance with community-based organizations that have direct connections to people struggling to pay their rent; and
- supporting households with language access needs through materials translated in 25 languages.

¹ This 2020 progress report advances Goal 10.

² June 2020 estimate based on number of rent-burdened households impacted by COVID-19 and of undocumented renters who have lost jobs (and do not qualify for unemployment).

³ King County COVID-19 race and ethnicity data dashboard.

Initial program data from the tenant-based fund through October 2020 shows 71 percent of those applying are people of color, and 32 percent of applicants reported a disability.

Community Engagement and Co-Creation in the 2021-2022 Biennial Budget

Advances Goals 2 and 8

King County's 2021-2022 Biennial Budget⁴ changed the County's approach to working with communities. Targeted investments will empower affected community members to co-create priorities and support the requests of community-based organizations. These include:

- a participatory budget process to determine uses for \$10 million in new capital projects in the urban unincorporated areas of Skyway, White Center, Fairwood, East Federal Way, and East Renton, and
- \$10 million in seed funding for a community center in Skyway, a long-time need that has been requested from the community.

Health Through Housing Fund

Advances Goal 3

In fall 2020, the King County Executive proposed the Health through Housing program. This program will acquire and preserve existing single-room settings, such as hotels and long-term care facilities, to provide emergency and permanent supportive housing for people experiencing chronic homelessness. The program will also fund operating and supportive services, including behavioral health services, within housing to keep people healthy and housed. King County imposed an additional sales tax of 0.1%, as authorized by RCW 82.14.530, to fund this program. As proposed, the Health Through Housing Fund will address inequities present in the chronic homeless population, including the disproportionate representation of Black, indigenous, and people of color (BIPOC) and other populations. This work will continue in 2021.

Affordable Housing for Larger Families

Advances Goal 4

Large families are more likely to experience overcrowding, ⁷ and average household size varies significantly depending on national origin. ⁸ The King County Housing Finance Program's 2019 funding round supported the needs of large families by awarding capital funding to the following projects that include a total of 103 units with three or more bedrooms:

- Abbey Ridge by the King County Housing Authority 7 units
- Africatown Plaza by Community Roots Housing/Africatown Community Land Trust 12 units
- Redondo Heights Transit-Oriented Development by the Multi-Service Center 54 units
- Rose Street II by Bellwether Housing 23 units
- Uncle Bob's Place by the Interim CDA/Edge 7 units

Skyway-West Hill and North Highline Anti-Displacement Efforts

Advances Goals 2, 5, 6, and 8

⁴ 2021-22 Biennial Budget Ordinance 19210.

⁵ Proposed Ordinance 2020-0338.

⁶ Ordinance 19179.

⁷ 2012-2016 Comprehensive Housing Affordability Data.

⁸ 2017 5-Year American Community Survey Population Estimates.

In response to community displacement concerns amid escalating housing prices and rents, the Department of Local Services and DCHS are partnering on a study of actions King County can take to develop and retain affordable housing in Skyway-West Hill and North Highline. 9, 10 DCHS and DLS started the analysis and community engagement for this study, and the Executive will deliver a final report to Council in September 2021. King County's 2021-2022 Biennial Budget also restricts \$5 million for affordable housing projects in Skyway-West Hill. 11

Planning for Growth Through a Health and Equity Framework

Advances Goals 7 and 9

In 2020, the Affordable Housing Committee considered amendments to the Housing Chapter of the King County Countywide Planning Policies (CPPs). ¹² The CPPs address growth management issues in King County and serve as a framework for each jurisdiction to develop its own comprehensive plan. ¹³ The proposed amendments promote equitable health and quality of life outcomes for all and are guided by data-driven measures of equity and recent engagement with diverse communities. The draft Housing Chapter proposal addresses issues such as residential displacement, racial homeownership gaps, and the distribution of affordable housing throughout the county. The Affordable Housing Committee provides recommendations to the Growth Management Planning Council, which is scheduled to adopt the CPPs in 2021.

⁹ Motion 15539.

¹⁰ <u>2016 King County Comprehensive Plan, Action 19: Skyway-West Hill and North Highline Anti-Displacement Strategies</u>, Pages 12-24.

¹¹ 2021-22 Biennial Budget Ordinance 19210, Section 106, Expenditure Restriction 6.

¹² November 13, 2020 Affordable Housing Committee meeting.

¹³ King County Countywide Planning Policies.