

**King County Analysis of Impediments to Fair
Housing Choice**

2019

Public Review Draft

June 14, 2019

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King County staff are also available upon request to provide briefings to city councils, advisory boards and commissions, and other organizations on this process and key findings.

INTRODUCTION AND EXECUTIVE SUMMARY

Introduction

Everyone deserve 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 will be critical for its undoing.

The Federal Fair Housing Act of 1968 banned discrimination against certain protected classes and mandates all local governments take meaningful actions to combat discrimination, overcome segregation, and foster inclusive communities free from barriers that restrict access to opportunity.

Protected Classes in King County

Federal	State of Washington	King County (unincorporated)
Race	Creed	Age
Color	Marital Status	Ancestry
National Origin	Veteran/Military Status	
Religion	Use of Service or Assistive	
Sex	Animal	
Disability	Source of Income	
Familial Status		

This Analysis of Impediments to Fair Housing Choice (AI) seeks to understand the barriers to fair housing choice as identified by community and stakeholder input and data and policy analysis, and will guide policy and funding decisions to address discrimination and segregation in King County.

This analysis is written in the context of King County’s Equity and Social Justice Strategic Plan, which provides a lens through which all critical government decisions are made. The Strategic Plan creates a framework to analyze 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 Report 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 includes 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 affirmatively further fair housing.

This analysis is conducted 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 analysis includes the City of Seattle, particularly for the analysis of shifting demographics and segregation throughout King County, it 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 its own Assessment of Fair Housing in 2017, which you can read [here](#).¹

This analysis is primarily based on the structure of the 2017 Assessment of Fair Housing Local Government Assessment Tool and the data from the Affirmatively Furthering Fair Housing Data and Mapping Tool provided by the Department of Housing and Urban Development (HUD).² More current and supplemental data sources are included when appropriate, and the structure has been modified to improve readability.

¹ <http://www.seattle.gov/Documents/Departments/HumanServices/CDBG/2017%20AFH%20Final.4.25.17V2.pdf>

² <https://egis.hud.gov/affht/>

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 can be categorized within three racial compositions: areas that are diverse, predominantly White and Asian, and 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.
- Lower-income communities of color and immigrant communities experience disproportionate housing needs.
- Housing prices have increased dramatically in the last ten years, displacing lower-income communities of color and immigrants.
- Field-testing conducted across jurisdictions in King County has so far found evidence of individual-level housing discrimination in about half of all tests.
- Blacks are half as likely to apply for a home loan and twice as likely to be denied.

Based on past community input, coordination with existing plans and programs, and the findings from policy research and demographic analysis, this report proposes an initial set of goals:

1. Engage underrepresented communities in participation and access to opportunities.
2. Provide more housing for vulnerable populations.
3. Provide more housing choices for people with large families.
4. Increase affordable housing resources.
5. Preserve and increase affordable housing in communities with a high risk of displacement.
6. Preserve the quality of the affordable housing stock.
7. Review zoning laws to increase density in urban areas.
8. Work with communities to engage in community revitalization efforts.
9. Invest in programs that provide education and enforcement of fair housing laws.
10. Support the Affordable Housing Committee's efforts to promote fair housing.

King County is reaching out to stakeholders who represent diverse perspectives on fair housing issues to gather input. Nonprofit housing providers, the King County and Renton Housing Authorities, for profit housing providers, tenant advocates, community based organizations, local jurisdictions, and other partners will be consulted to refine this analysis and provide input on priorities, goals, and next steps.

COMMUNITY PARTICIPATION PROCESS

King County is hosting three public meetings across the region to engage with the public and receive input on issues of fair housing, as well as distributing an online survey to further canvas the public on specific issues related to fair housing. This draft is available for public review and comment from June 14-July 15.

The Joint Recommendations Committee, which oversees the funding decisions of the King County Consortium, will review and approve this report this summer. The King County Department of Community and Human Services plans to submit this report to the King County Council by September. The King County Council will also provide a venue for additional public comment. King County plans to submit this analysis alongside the 2020-2024 Consolidated Plan to HUD in November of 2019.

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ASSESSMENT OF PAST FAIR HOUSING GOALS

King County participated in a regional Fair Housing and Equity Assessment lead by the Puget Sound Regional Council (PSRC) in 2015. You can read the full report [here](#).³ The following table reviews the goals set in that assessment, policies and programs implemented since 2015 that seek to further these goals, and the results or current status towards reaching each goal. King County and partner cities welcome input on other activities and results in King County that have not been included in this assessment, as well as on goals where progress has not been made since 2015.

	Goal	Activities	Results
I.	Fair Housing Education and Information		
A.	Work with regional funding partners and fair housing agency partners to increase the visibility of fair housing enforcement resources.	<ul style="list-style-type: none"> • Fair housing and tenant advocacy organizations perform outreach and education of fair housing enforcement resources: <ul style="list-style-type: none"> ○ Fair Housing Center of Washington ○ The Tenants Union of Washington • Information and access to resources are posted on the websites of: <ul style="list-style-type: none"> ○ King County ○ City of Seattle ○ Washington State Human Rights Commission ○ U.S. Department of Housing and Urban Development 	<ul style="list-style-type: none"> • Education and access to enforcement resources are available.

³ <https://www.psrc.org/sites/default/files/fairhousingequityassessment.pdf>

	Goal	Activities	Results
B.	Work with regional funding partners and fair housing agency partners to consider funding specific enforcement initiatives for rental housing in high opportunity areas and high capacity transit areas.	<p>The Fair Housing Center of Washington is certified as a private fair housing enforcement initiative program through HUD.⁴</p> <p>Fair housing enforcement is available in King County:</p> <ul style="list-style-type: none"> • The U.S. Department of Housing and Urban Development (HUD) enforces federal laws.⁵ • The Washington State Human Rights Commission enforces state laws.⁶ • Local jurisdiction enforcement programs include: <ul style="list-style-type: none"> ○ City of Bellevue⁷ ○ King County Civil Rights Program (for unincorporated areas)⁸ ○ City of Seattle Office of Civil Rights⁹ 	<ul style="list-style-type: none"> • 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	Information regarding fair housing is available and education has continued through the Fair Housing of Washington. However, King County and partner cities did not fund specific educational campaigns.	<ul style="list-style-type: none"> • Elected officials, housing professionals, renters, and homebuyers, are still often

⁴ https://www.hud.gov/program_offices/fair_housing_equal_opp/contact_fhip

⁵ https://www.hud.gov/program_offices/fair_housing_equal_opp

⁶ <https://www.hum.wa.gov/fair-housing>

⁷ <https://development.bellevuewa.gov/codes-and-guidelines/code-compliance>

⁸ <https://www.kingcounty.gov/elected/executive/equity-social-justice/civil-rights.aspx>

⁹ <https://www.seattle.gov/civilrights/civil-rights/fair-housing>

	Goal	Activities	Results
	training, including specific education for public and elected officials – assess need for funding for specific educational campaigns.		not aware of fair housing rights or responsibilities.
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 available and distributed at fair housing seminars and are available online.	<ul style="list-style-type: none"> • Most of the fair housing materials are outdated pamphlets.
II.	Landlord/Housing Barriers		
A.	Work with partners, stakeholders, and private landlords to reduce housing screening barriers,	There has been significant activity in recent years for reducing screening barriers to housing, with a focus on policies that have disproportionate impacts on people of color.	RCW 43.31.605 created the Washington State Landlord Mitigation Program in 2018. ¹⁰ The program provides education

¹⁰ <https://www.commerce.wa.gov/building-infrastructure/housing/landlord-mitigation-program/>

	Goal	Activities	Results
	including disparate treatment of protected classes and criminal background barriers that have a disparate impact on persons of color.		and, in some cases, financial support to landlords who rent to tenants receiving rental assistance.
B	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.	<ul style="list-style-type: none"> The Housing Connector connects private property owners/managers to those most in need of housing. Click here to learn more. ¹¹
C.	Work with partners to add the coverage of source of income/rental assistance/Section 8 discrimination at the State level and at the local level	<ul style="list-style-type: none"> King County and other partners advocated banning source of income discrimination at the Washington State Legislature. 	<ul style="list-style-type: none"> The Washington State Legislature banned source of income discrimination statewide in 2018. You can

¹¹ <https://www.housingconnector.com/>

	Goal	Activities	Results
	for jurisdictions that do not currently include this as a protected class and that have the capacity of administer such a program and explore other opportunities to reduce barriers to the use of Section 8 and other rental assistance in housing.		find more information about the bill here . ¹²
D.	Provide technical assistance to help agencies get their questions answered by the appropriate fair housing professional.	<ul style="list-style-type: none"> King County and partner cities have not provided technical assistance. 	<ul style="list-style-type: none"> The Fair Housing Center of Washington continues to provide technical assistance.
III.	Access to Opportunity		
A.	In coordination with funding and community partners, make strategic	Since 2015, King County government has invested over \$180 million in transit-oriented development or high opportunity area affordable housing.	<ul style="list-style-type: none"> Significant affordable housing investments were made in

¹² <https://app.leg.wa.gov/billsummary?BillNumber=2578&Year=2017&Initiative=false>

	Goal	Activities	Results
	investments in affordable housing in regions of the Consortium that have high access to opportunity.		affordable housing projects in high access to opportunity.
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 program Communities of Opportunity (COO) in partnership with the Seattle Foundation, which seeks to empower residents and communities with low access to opportunity. One of the primary goals of COO is to increase economic opportunity. Click here for more information. ¹³	<ul style="list-style-type: none"> 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. Click here for more information. ¹⁴	<ul style="list-style-type: none"> Significant disparities in health outcomes persist in low-income communities.

¹³ <https://www.coopartnerships.org/>

¹⁴ <https://www.coopartnerships.org/>

	Goal	Activities	Results
D.	Work with partners on legislative matters, incentive programs, and tools that encourage responsible development in areas of low access to opportunity and ensure that there are plans to address displacement of low-income persons, if such may occur.	<ul style="list-style-type: none"> Addressing displacement and gentrification was an emerging topic during the past five year planning period. The Regional Affordable Housing Task Force convened elected officials and expert stakeholders and culminated in a Final Report and Five-Year Action Plan. Goal 5 of the Regional Affordable Housing Task Force is to “Protect existing communities of color and low-income communities from displacement in gentrifying communities,” and includes a number of strategies to achieve this goal. The King County Housing Authority has prioritized acquisition and preservation of affordable housing in areas at high risk of displacement. 	<ul style="list-style-type: none"> In 2019, the City of Kenmore rezoned its manufactured housing communities to ensure they were not replaced with another housing type. King County’s 2019-2020 budget included funding for a TOD Preservation and Acquisition Plan. The plan currently proposes preserving 582 units in the coming years. You can learn more about the plan here.

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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 provides a brief overview of the existing programs and policies seeking to address these issues.

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Demographic Trend Summary

King County has seen significant demographic shifts since 1990 in overall population and makeup by race, ethnicity, and country of origin. King County's population has increased from 1,507,319 in 1990 to a 2018 Census estimate of 2,190,200, an increase of 45%. This was significantly faster than the overall U.S. population growth of 32% from 1990 to 2018.

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

Race/Ethnicity

King County has become significantly more diverse, with the White, not Hispanic or Latinx population decreasing from 84.8% in 1990 to a 2018 Census estimate of 60%. The Asian and Latinx populations grew most rapidly in this time, increasing from 7.9% to 18.2% and from 2.9% to 9.7% of the overall population, respectively. The Black population grew from 5.1% in 1990 to a 2018 estimate of 6.8%. 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 516,000, an increase of 367% compared to 1990. The growth of this population accounts for 48% of the overall population growth in King County, and our foreign-born population accounts for 24% of the overall population, significantly higher than the national average of 14% and slightly higher than 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%

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

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

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% speak Spanish, 16% speak Indo-European languages, and 9% speak other languages.¹⁵ The most common languages spoken by K-12 students with LEP in King County are¹⁶:

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

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, married with or

¹⁵ Source: 2016 American Community Survey 1-Year Estimate

¹⁶ Source: Washington State Office of Financial Management, Forecasting Division, 2016 estimates:
https://www.ofm.wa.gov/sites/default/files/public/legacy/pop/subject/ofm_pop_limited_english_proficiency_estimates_2016.xlsx

without children, or single parent households. The average household size in King County is 2.5. These figures are similar for the United States as a whole.

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	3.89
Snoqualmie	3.1
Sammamish	3.0
Duvall	3.0

The areas with the smallest average household size are:

Jurisdiction	Average Household Size
Skykomish	1.4
Unincorporated King County	1.9
Seattle	2.1

The King County Office of Economic and Financial Analysis performs annual demographic trend analysis. [Click here](#) to visit their webpage.¹⁷

¹⁷

<https://www.kingcounty.gov/independent/forecasting/King%20County%20Economic%20Indicators/Demographics.aspx>

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 experience 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 contain significant Asian populations. Please 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 does 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 0 would represent complete integration, while a score of 100 would represent complete segregation.

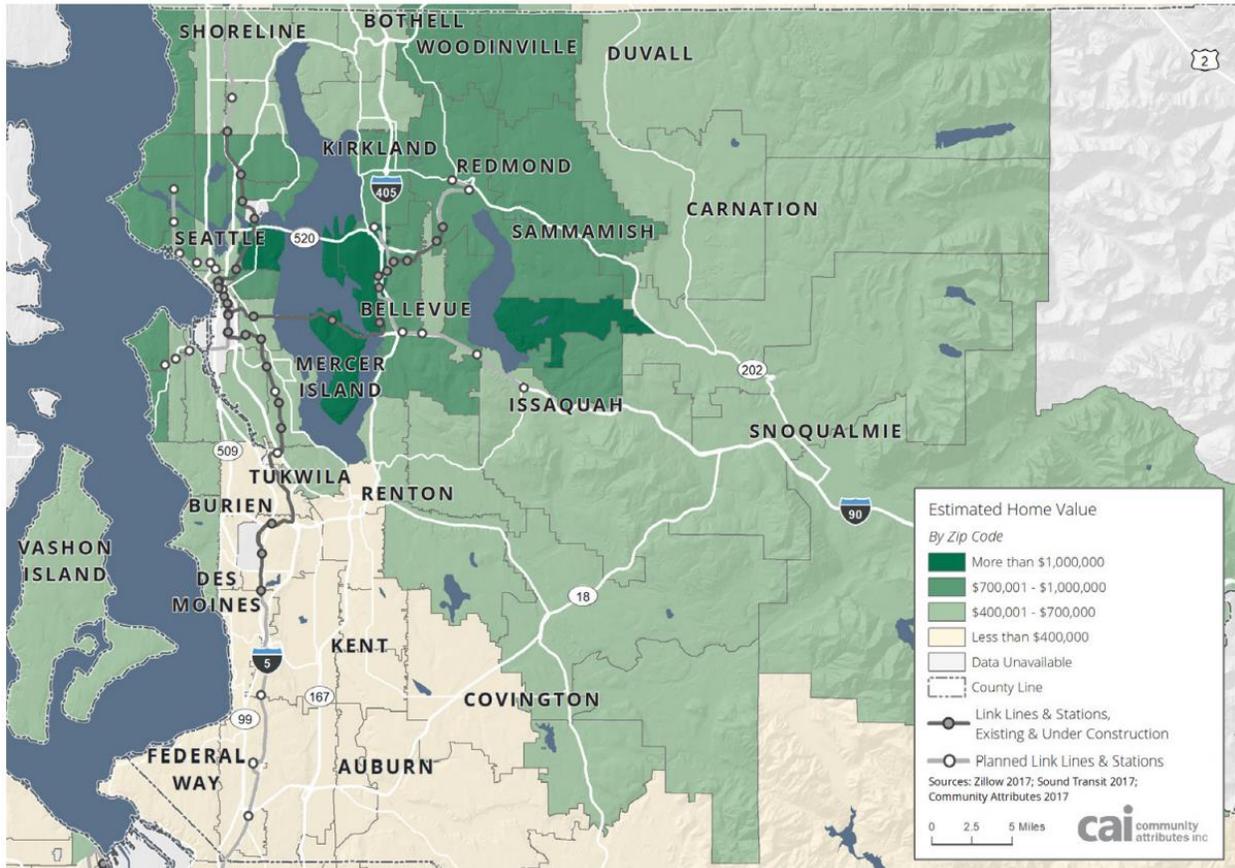
Race	Dissimilarity Index
White/Non-White	35.81
Black/White	56.71
Hispanic/White	39.71
Asian/White	36.22

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 into Southwest King County, with the Asian population also growing significantly in the urban areas east of Seattle.

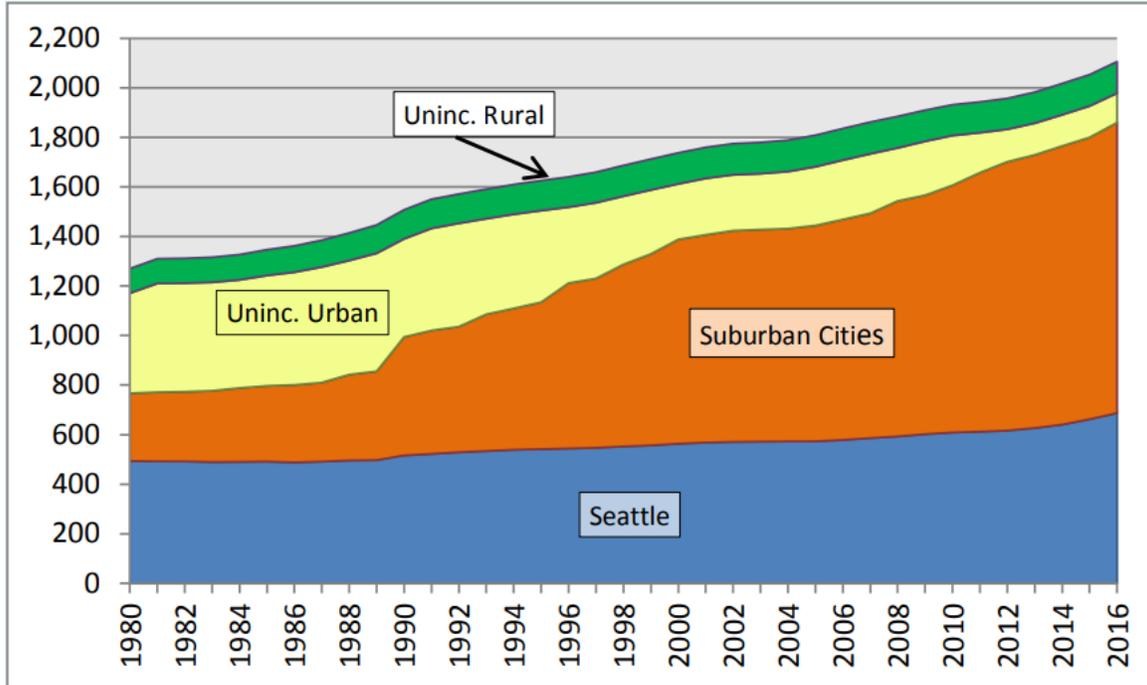
Since approximately 2013, dramatic increases in the cost of housing have displaced lower-income communities of color farther south in Seattle or into the more affordable areas of Southwest King County.

Estimated Home Value, 2017



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.

Population Change in King County Jurisdictions, 1980-2016



A major factor for why the rural area's population and demographics have changed relatively little is the Growth Management Act of Washington State (GMA). 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, 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.

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	2018 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 Pacific Islander	\$62,500	75%
Hispanic or Latinx	\$57,933	69%
Some other race	\$52,070	62%
American Indian and Alaska Native	\$45,923	55%
Black or African American	\$42,280	51%

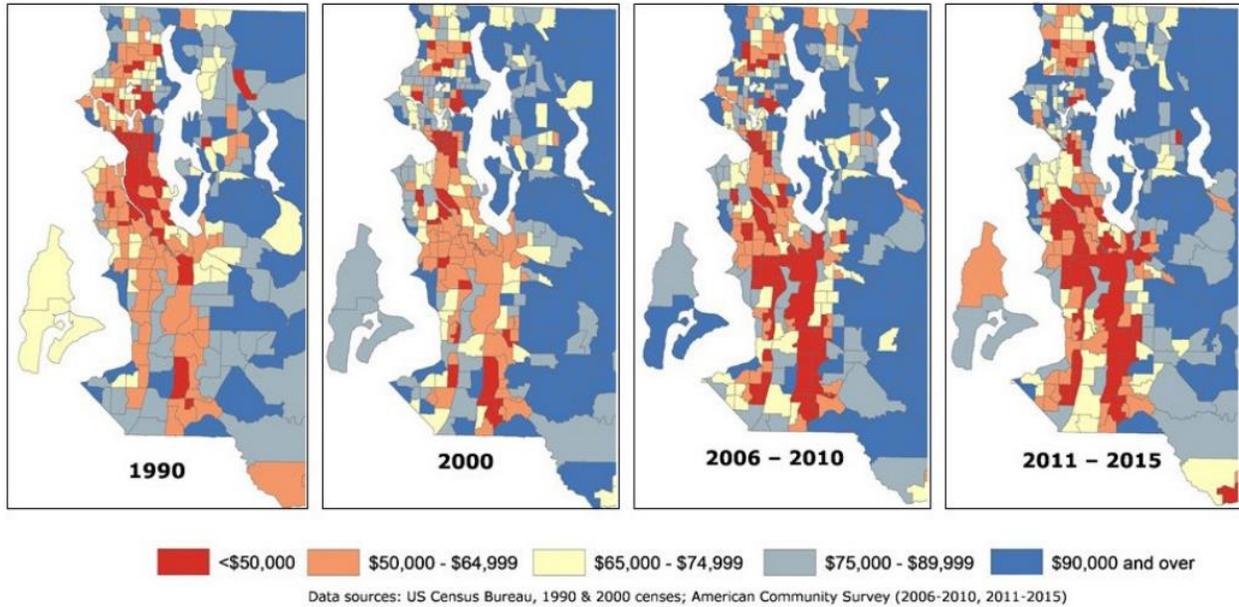
As the preceding table shows, White and Asian households earn above, while all other races earn significantly below, the King County median income.

Another significant income disparity that contributes to segregation trends in King County is between US-born and foreign-born individuals. On average, foreign-born individuals earn \$34,871, while US born individuals earn \$41,983. 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	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
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

The most striking disparity is households with an adult born in Somali, who have a median income below the federal poverty line, depending on household size. 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.

Median household income by King County neighborhood, 1990-2015



Historical Redlining and 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 to building future wealth, and parental homeownership significantly increases the chance that their children will buy a home.¹⁸ These policies have

¹⁸ https://www.urban.org/sites/default/files/publication/99251/intergenerational_homeownership_0.pdf

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 & Labor History Project, based at the University of Washington, provides a wealth of information about the history of segregation in King County. You can learn more about redlining and racially restrictive covenants, including mapping of both practices, [here](#).¹⁹

King County's Topography

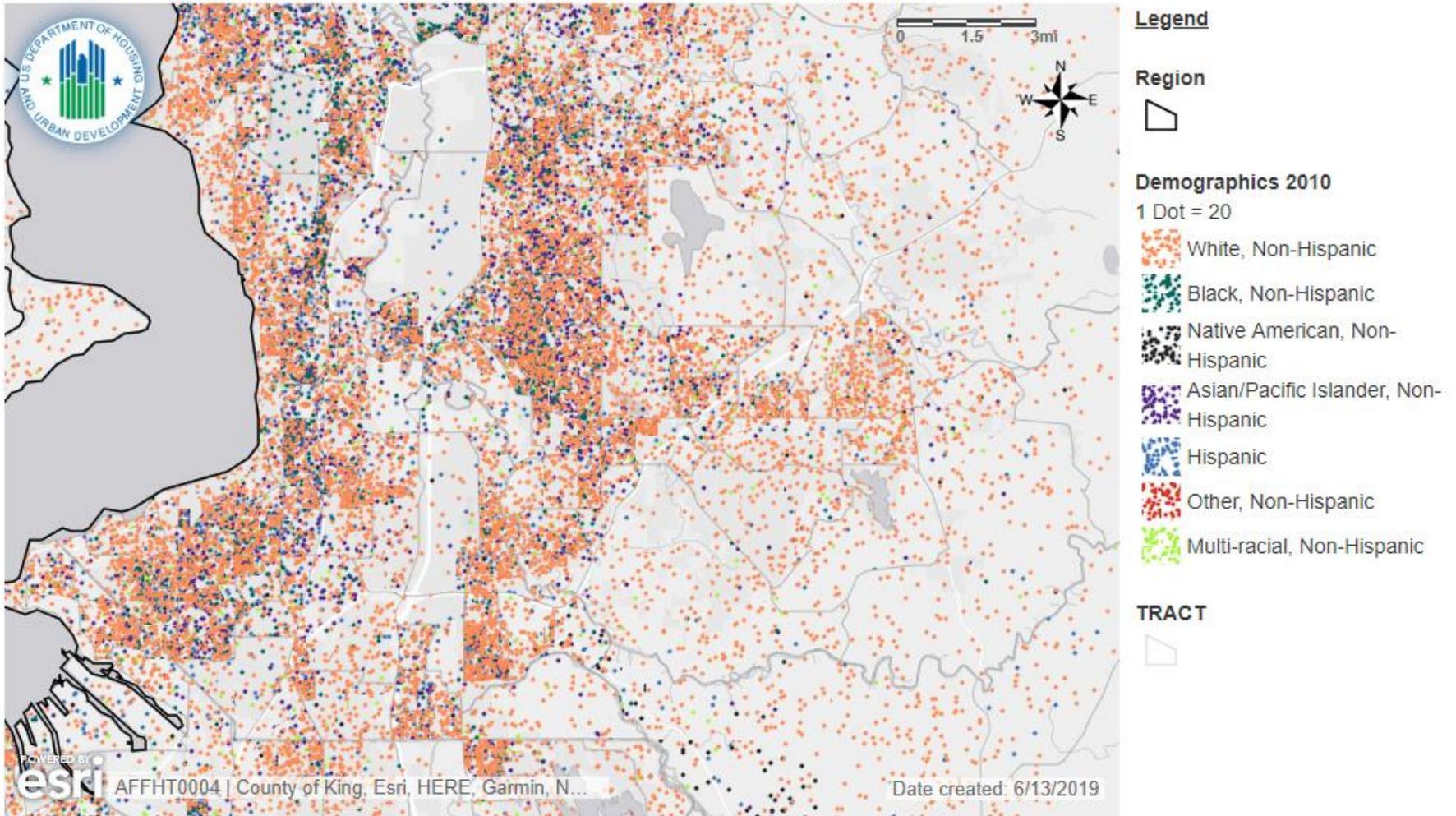
Another factor that may contribute to racial and ethnic segregation patterns in King County is its topography. Access to and views of Puget Sound, lakes, and mountains have a strong influence on housing prices and are dispersed throughout King County. Areas with these assets tend to have a majority White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

Because housing with views or water access can be in close geographic proximity to housing without these assets, 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 can be 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% White in distances as short as half a mile. Please see the next page for a map of the racial and ethnic composition of this area.

¹⁹ <https://depts.washington.edu/civilr/segregated.htm>

Race/Ethnicity Map – Southwest King County

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



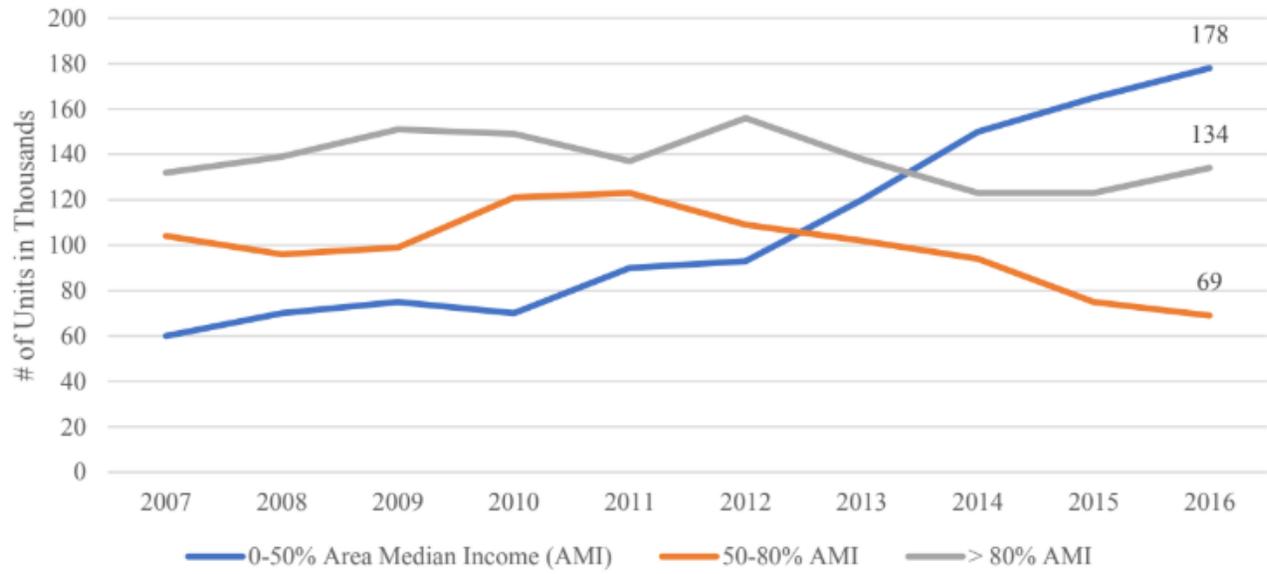
Name: Map 1 - Race/Ethnicity

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

Displacement of Residents Due to Economic Pressures

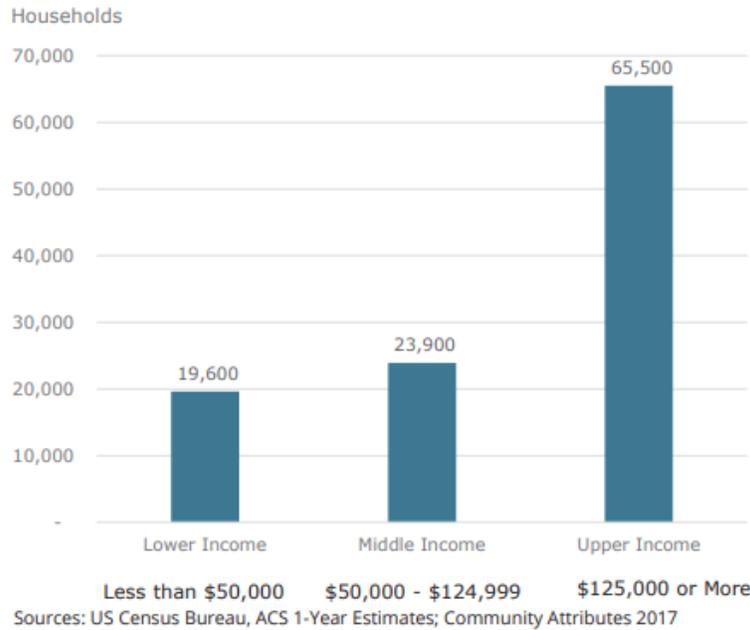
King County has experienced dramatic increases in the cost of housing since the recession of 2008. Even as the overall number of homes has increased in the last ten years by 88,000, the number of rental homes affordable to low and moderate income families has decreased by 36,000.

Change in Affordable Housing Stock in King County by Income Range



This is due in large part to significant growth in higher-income households.

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



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.

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. 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.

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.²⁰

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. Familial status, race, religion, disability, and national origin were all identified as having experienced housing discrimination.

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.

Programs, Policies, and Investments to Address Segregation, Fair Housing, and Geographic Mobility

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 targeted currently include:

- The Rainier Valley (City of Seattle)
- White Center
- SeaTac/Tukwila
- The City of Kent
- The Central District of the City of Seattle
- Rural Snoqualmie Valley
- The urban Native Community
- The 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, which may include:

- anchoring multi-cultural communities at risk of displacement,

²⁰ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5800413/>

- 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, and
- 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.

Creating Moves to Opportunity

The King County Housing Authority is participating in a housing search assistance program offered to families with young children who receive a Housing Choice Voucher. Creating Moves to Opportunity provides families an array of services aimed at reducing rental barriers to support them in moving to opportunity neighborhoods. You can learn more about this program [here](#).²¹

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²¹ <http://creatingmoves.org/research/>

RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY

Neighborhoods with high concentrations of poverty contribute to negative outcomes greater than the struggles of an individual family living in poverty. Concentrations of poverty limit educational opportunities, lead to increased crime rates and poor health outcomes, hinder wealth building, reduce private-sector investment and increase prices for goods and services, and raise costs for local governments.²² 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 a “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%.

King County is privileged to have 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% White, 16% Black, 1% Native American, 22.3% Asian, and 21.5% Latinx and 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, a census tract in the City of Kent between I-5 and Pacific Highway South was an R/ECAP with a White population of 46.6%, Black 17%, Native American 2%, Asian 13.5%, Hispanic 19.8%. Because King County has had so few R/ECAPs since 1990, the only discernable trend is that they have only been located in the Cities of Seattle and Kent.

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 R/ECAP tracts 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

²² <https://www.huduser.gov/portal/periodicals/em/spring13/highlight1.html>

and greater community. The partnership convenes community forums focused on creating affordable, safe housing for Kent residents, as well as opportunities for living-wage jobs and access to healthy, affordable foods.

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DISPROPORTIONATE HOUSING NEEDS

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

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 1 person per room²³
- Cost burden.

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%

There are also significant racial disparities in severe cost burden 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%

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

²³ This measure includes all rooms, such as kitchens and living rooms.

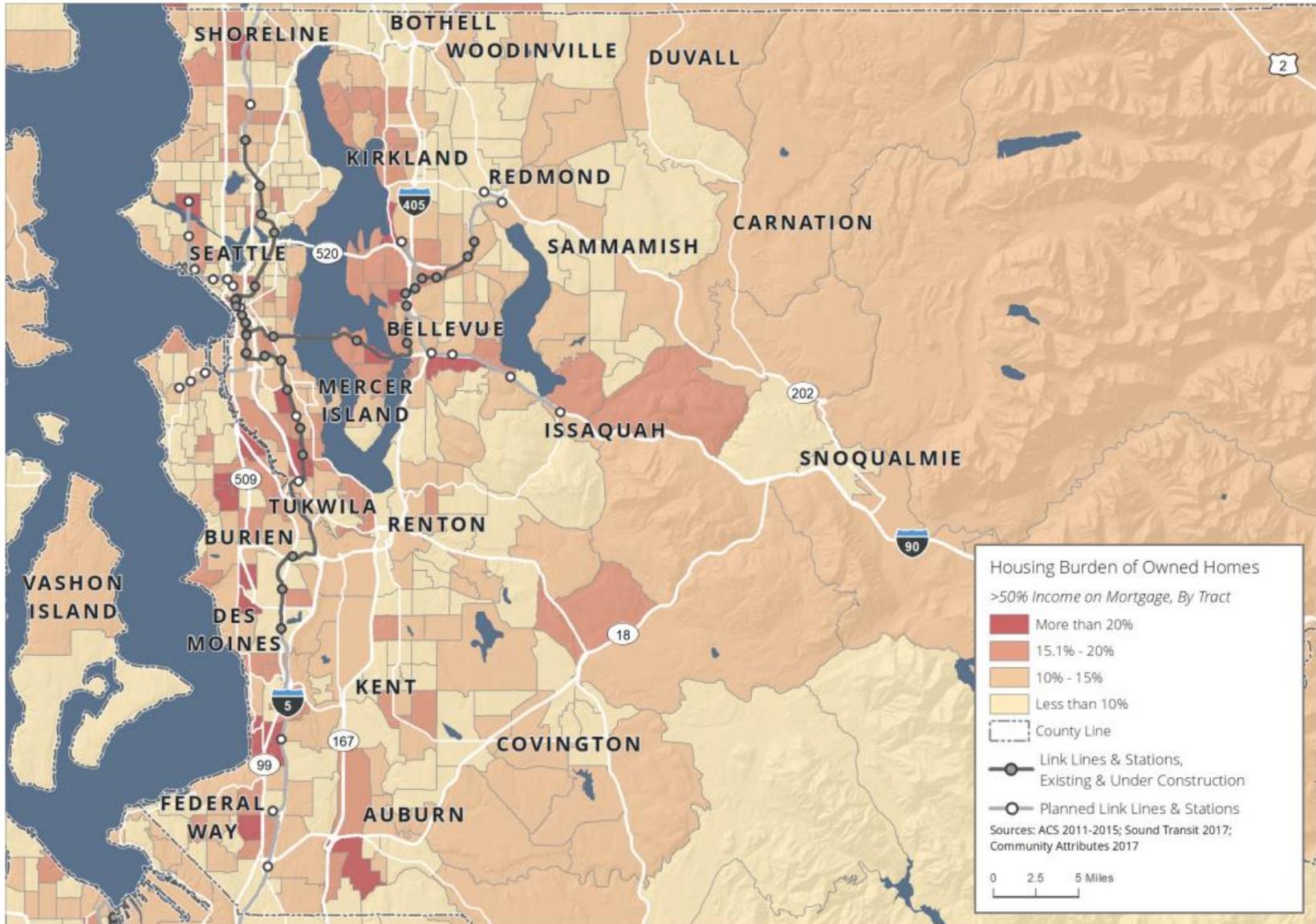
Rental vs. Homeownership Housing

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

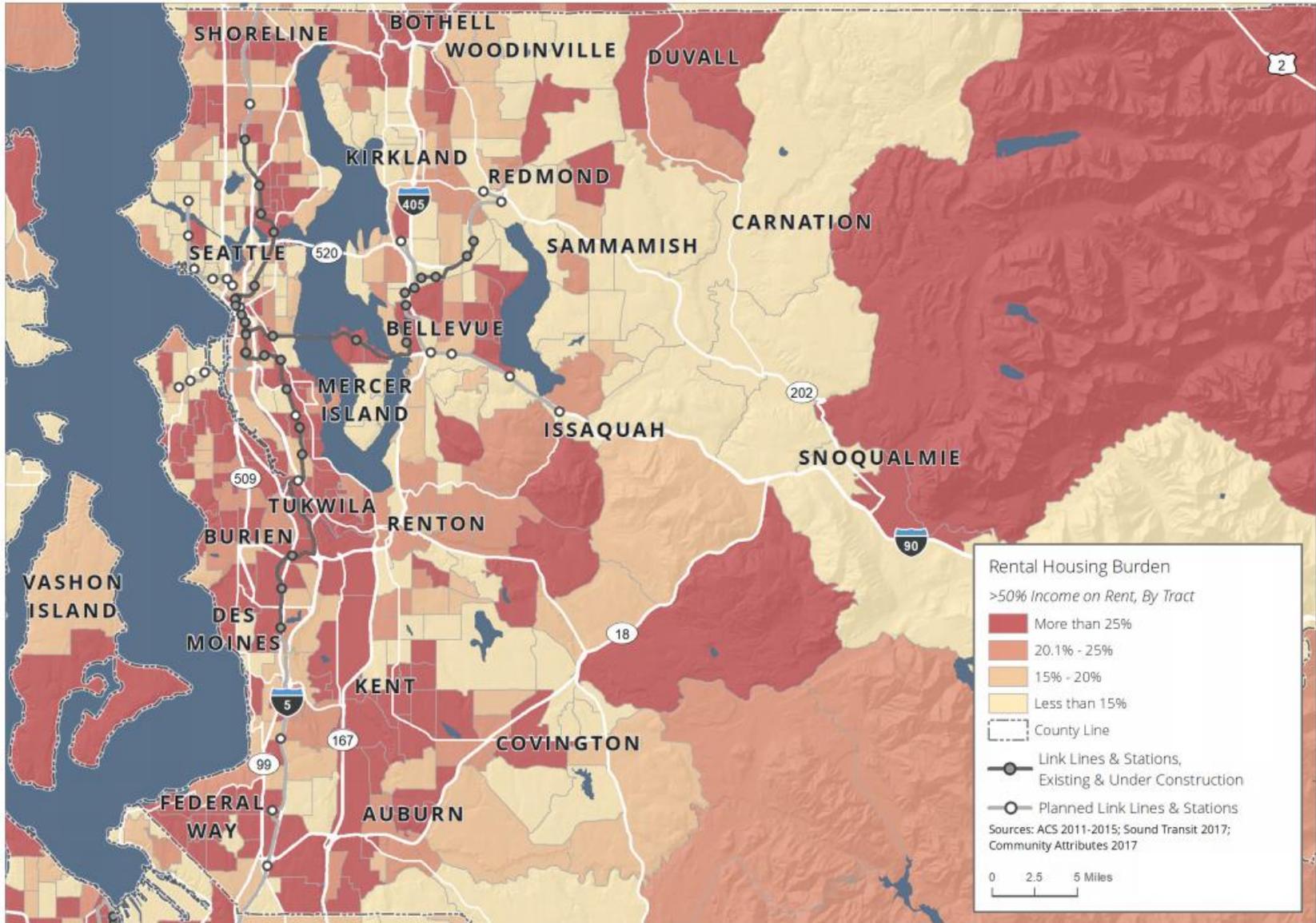
Household Type	Percent of Households who Rent	Percent of Households who Own
Black	72%	28%
Native Hawaiian or Pacific Islander	71%	29%
All other Races	71%	29%
Hispanic or Latinx	66%	34%
Native American	61%	39%
Two or More Races	60%	40%
All Households	43%	57%
Asian	42%	58%
White	38%	62%
Foreign Born	50%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

Areas of King County with high rates of rental housing are located primarily in the urban areas 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.

Homeowner Cost Burden



Renter Cost Burden



Familial Status

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

However, large families are also significantly more likely to experience housing problems, due primarily to the cost of larger housing and overcrowding. There is also significant variation in average household size by country of origin, likely meaning that certain immigrant populations face additional challenges obtaining sufficient housing for their families. The following table includes countries of birth 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	3.3
Philippines	3.3
Vietnam	3.0
Ethiopia	2.8
India	2.7
Hong Kong	2.7
Russia	2.7
China	2.7
Japan	2.6
Korea	2.6
Taiwan	2.6
Germany	2.6
United Kingdom, Not Specified	2.4
Canada	2.4

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% of units are two bedrooms and 13% of units are three bedrooms or larger.

Loss of Affordable Housing

The stock of homes affordable to households earning 80% 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% AMI and below decreased by 36,000.

This loss of affordable housing is due to a combination of market pressures as well as the physical demolition of affordable housing. 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 been unable to build 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 affordable housing. Naturally affordable housing is often redeveloped as the value of the land is higher relative to the value of the structure. Naturally affordable housing can also be lost through renovations or remodels that increase the cost of housing.

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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 to addressing these disparities.

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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 the 19 School Districts in King County.

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Overview of School Districts in King County

School District	Percent of 8 th Grade Students Meeting State Standards			Race/Ethnicity Demographics					Special Programs		
	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

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 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

This index also shows clear disparities by race, with the largest disparity between Whites and Blacks. This racial disparity persists among the population 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 (McLeary v. State of Washington) by increasing school investments at the state level and limiting how much funding can be collected locally and on how it can be spent.²⁴

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

²⁴ https://en.wikipedia.org/wiki/McCleary_v._Washington

opportunities for lower-income and non-White students to access the same resources as students living in wealthier areas.

Parent-Teacher Association Funding

Another contributor to disparities between and within school districts is funding provided by Parent-Teacher/Parent-Teacher-Students Associations (PTA/PTSAs). PTA funding perpetuates disparities through intergenerational wealth, as wealthier parents can invest in their children's school or in the specific program their child is interested in, bypassing the more redistributive investment patterns of government funding.²⁵ This funding stream can be used 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 or foundation assets or income.²⁶

Programs, Policies, and Investments Addressing Disparities in Access to Education

King County's Best Start for Kids Levy

Passed by the voters in 2015, Best Start for Kids 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.

You can learn more about the programs funded through BSK [here](#).²⁷

²⁵ <https://cdn.americanprogress.org/content/uploads/2017/04/18074902/ParentFundraising-report-corrected.pdf>

²⁶ <https://www.kuow.org/stories/some-seattle-school-ptas-can-afford-extra-teachers-should-they-spread-the-wealth>

²⁷ <https://beststartsblog.com/>

Race to the Top

In 2012, 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, allowing the group to further expand its programs, which work to:

- Increase the number of children ready for kindergarten
- Raise instruction quality in math and science
- Help students plan for career training or college
- Provide early intervention for struggling students

Home and Hope Project

Led by Enterprise Community Partners in conjunction with elected officials, public agencies, educators, nonprofits and 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 nonprofits in King County. You can learn more about the Home and Hope Project [here](https://www.enterprisecommunity.org/where-we-work/pacific-northwest/home-hope).²⁸

²⁸ <https://www.enterprisecommunity.org/where-we-work/pacific-northwest/home-hope>

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 and 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 shows disparities by race 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

Within the population below the poverty line, Whites are still significantly more likely to live in areas with low unemployment compared to Blacks. The White population is the most likely to live in an 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 not 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

A key factor not captured by the HUD Jobs Proximity Index is the nature of the jobs in a given area. King County is privileged to have 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.

Programs, Policies, and Investments Addressing Disparities in Access to Employment

King County Investments in Affordable Workforce Housing

The 2019-2020 King County budget included more than \$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.

King County Employment and Education Resources

King County Department of Community and Human Services provides employment programming. You can learn more about these services [here](#).²⁹

²⁹ <https://www.kingcounty.gov/depts/community-human-services/employment-and-education-resources.aspx>

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 Americans and Whites scoring the lowest, at 71.3 and 72.0. There are more pronounced disparities in transit use by race.

Race/Ethnicity	Percentage who commute via transit
White	12.2
Black	14.9
Asian	15.7
Hispanic or Latinx	15.6
Two or More Races	16.0

Whites are least likely to use 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 Whites in the rural areas of King County, which have limited transit service.

Contributing Factors to Disparities in Access to Transportation

Transportation Infrastructure Investments

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 should be given 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.

Programs, Policies, and Investments Addressing Disparities in Access to Transportation

Sound Transit Light Rail Expansion

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. You can learn more about Sound Transit's plans [here](#).³⁰

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% discount in fares to ensure low-income communities are not overly burdened by the cost of transportation. You can learn more about Orca LIFT [here](#).³¹

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% of low-income households in King County are within 1/4 mile of a bus stop.³²

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 to provide equitable access to opportunity for all the region's residents. You can learn more about the Growing Transit Communities Strategy [here](#).³³ Additionally, the most recent regional Fair Housing Assessment was conducted by the Puget Sound Regional Council in 2015. You can read the PSRC Fair Housing Equity Assessment [here](#).³⁴

³⁰ <http://soundtransit3.org/overview>

³¹ <https://kingcounty.gov/depts/transportation/metro/fares-orca/orca-cards/lift.aspx>

³² <https://www.kingcounty.gov/elected/executive/constantine/priorities/transportation/infographic/sources.aspx>

³³ <https://www.psrc.org/growing-transit-communities>

³⁴ <https://www.psrc.org/sites/default/files/fairhousingequityassessment.pdf>

King County Transit-Oriented Development Investments

In 2016, King County began a 5-year competitive RFP process to invest approximately \$87 million in transit-oriented affordable housing projects. You can read the full plan [here](#).³⁵ The 2019-2020 King County budget also included more than \$100 million in transit-oriented development for affordable workforce housing.

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³⁵ <https://www.kingcounty.gov/~media/depts/community-human-services/housing/documents/housing-finance/tod-bond-allocation-plan-final-sm.ashx?la=en>

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.

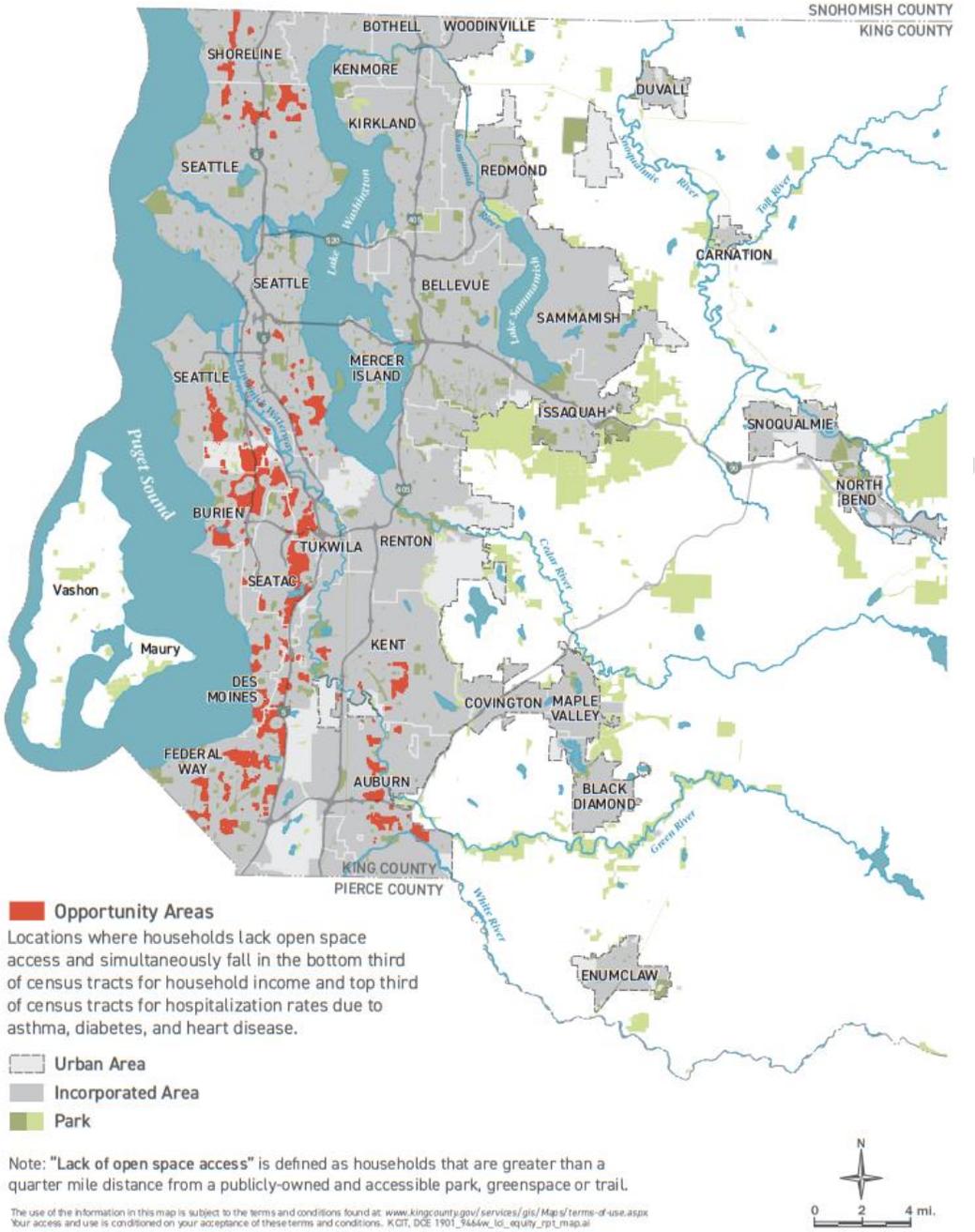
Race/Ethnicity	Environmental Health Index
White	27.0
Black	10.4
Hispanic or Latinx	16.0
Asian or Pacific Islander	17.6
Native American	29.6

Black residents in King County are the least likely to have access to environmentally healthy neighborhoods. Native Americans scored the highest, a few points above Whites, 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. The river has been contaminated with a number of pollutants over the decades, most notably a significant amount of polychlorinated biphenyls, arsenic, carcinogenic polycyclic aromatic hydrocarbons, dioxins, and furans. The neighborhoods along the Duwamish house many immigrants and communities of color.

Five hundred thousand King County residents do not live within ¼ mile from a publicly owned park, green space, or trail, and most of these residents live in Southwest King County.³⁷

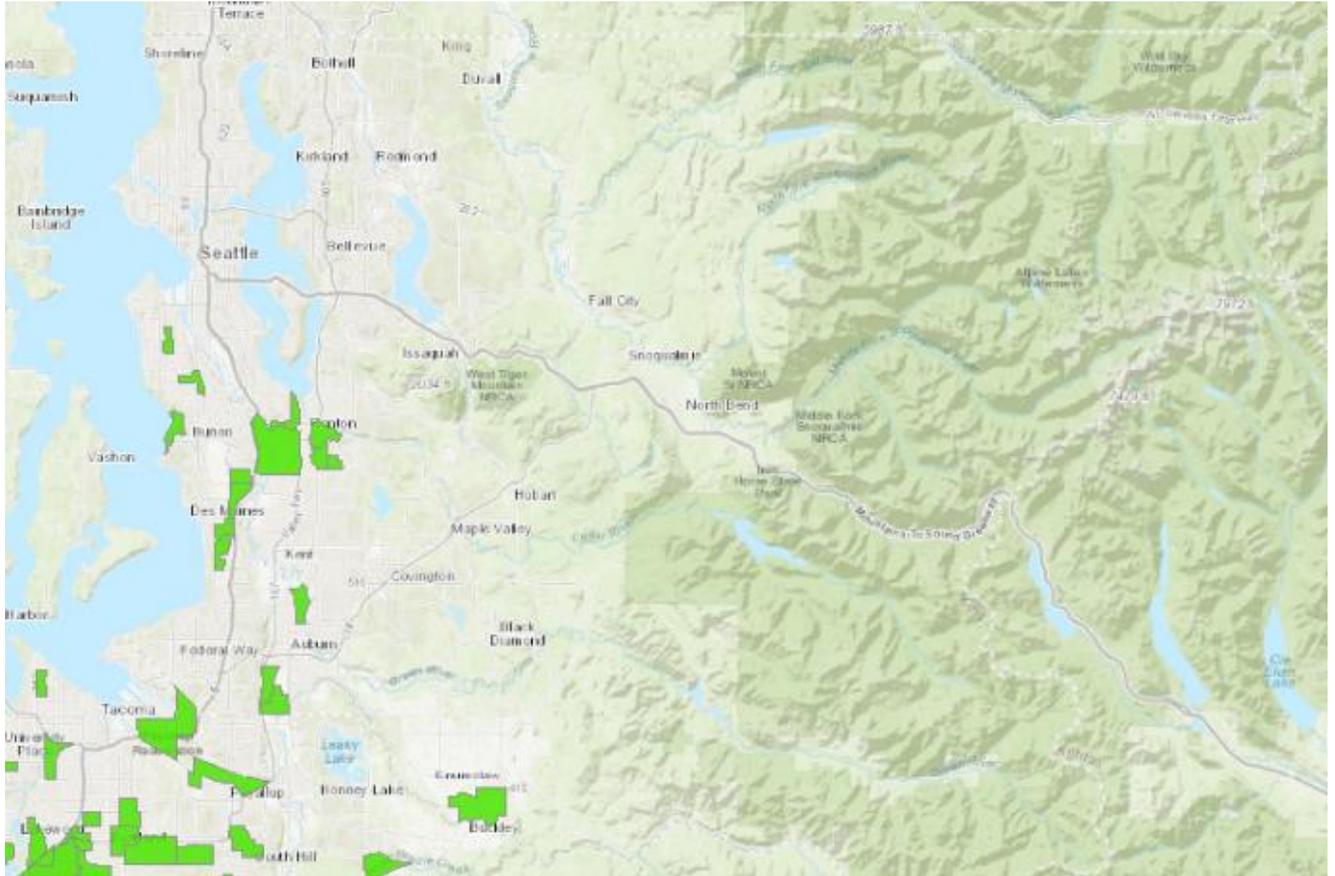
OPEN SPACE INEQUITIES IN KING COUNTY



³⁷ <https://your.kingcounty.gov/dnrg/library/water-and-land/land-conservation/equity/20190319-Open-Space-Equity-Cabinet-Report.pdf>

Lack of access to healthy food options can have negative health outcomes.³⁸ 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.

King County Food Deserts



Source: USDA Food Access Research Atlas.³⁹

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.

³⁸ <https://www.ncbi.nlm.nih.gov/books/NBK208018/>

³⁹ <https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas/>

Lower cost housing is also more likely to be older, which increases the likely of asbestos, mold, and lead paint contamination. Because of the deep 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.

Programs, Policies, and Investments Addressing Disparities in Access to Healthy Environments

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 providing access to greenspace and open space and advise the County on how to best engage communities and cities to add open space in underserved areas. You can learn more about the Open Space Equity Cabinet and read their full report [here](#).⁴⁰

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. You can learn more about their services [here](#).⁴¹

Environmental Justice Network in Action

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

⁴⁰ <https://kingcounty.gov/services/environment/water-and-land/land-conservation/Equity/OpenSpace.aspx>

⁴¹ <https://www.kingcounty.gov/depts/health/environmental-health.aspx>

- Improve the capacity of CBOs, non-profit groups and government agency partners to design, deliver and evaluate programs and services.

You can learn more about the EJNA [here](#).⁴²

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.

This report is a draft, and will change to reflect community input. King County and partner cities welcome your feedback, and want to hear from all individuals and community organizations on what they see as the greatest barriers to fair housing choice, existing efforts to address these issues that have not been included, and what solutions would be most effective. Please attend our community meetings or contact us directly:

Alice Morgan-Watson at Alice.Morgan-Watson@kingcounty.gov or 206-263-0794.

King County staff are also available upon request to provide briefings to city councils, advisory boards and commissions, and other organizations on this process and key findings.

⁴² <https://www.hazwastehelp.org/EnvironmentalJustice/ejna.aspx>

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.

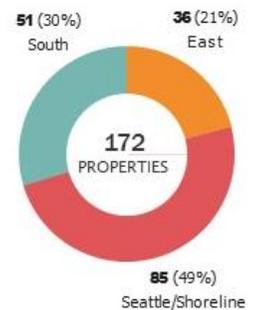
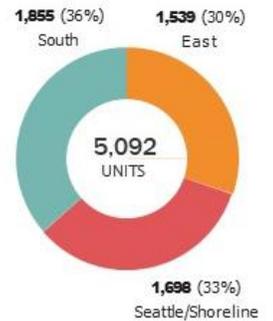
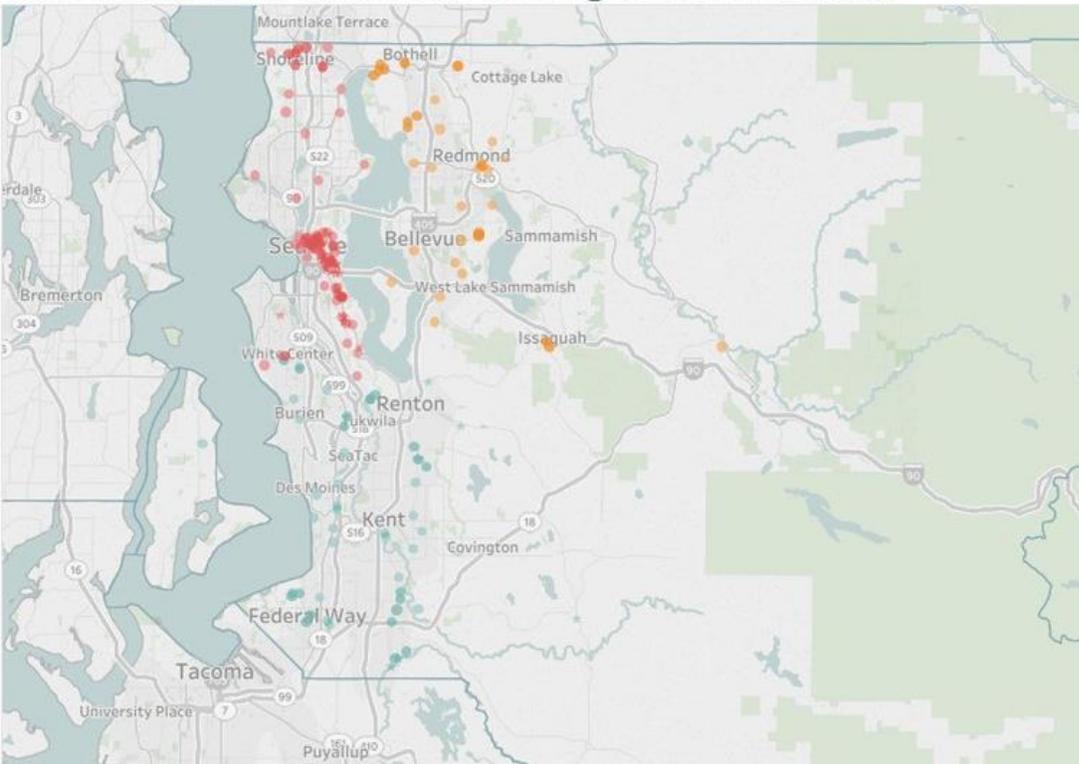
Summary of Publicly Supported Housing Disparities/Dynamics

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 provide affordable housing, such as Low-Income Housing Tax Credits, Multifamily Housing Tax Exemptions, inclusionary housing programs, and other local funding sources provide affordable units.

Publicly supported housing is distributed throughout the urban areas of King County.

Publicly Supported Affordable Housing in King County –

Units affordable to households earning 80% AMI or below



Map Legend

Affordable Housing Type
 ★ Homeownership Property
 ● Rental Property

Region
 East
 Seattle/Shoreline
 South

There are high concentrations of publicly supported housing in the downtown core of Seattle, which is zoned for greater density and has 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	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

Black households are significantly more likely to utilize the Housing Choice Voucher Program, 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.

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 homes 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.

Programs, Policies, and Investments Addressing Disparities in Location of and Access to Publicly Supported Housing

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.

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 currently proposes preserving 582 units in the coming years. You can learn more about the plan [here](#).⁴³

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⁴³ <https://mkcclegisearch.kingcounty.gov/LegislationDetail.aspx?ID=3876610&GUID=DD8C9E4E-56BC-4AD6-9B76-C24EB3FC68E5&Options=Advanced&Search=>

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 are dispersed 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 transitioning out larger institutions over the last fifty years. The single major remaining institution for people with disabilities in King County is Fircrest Rehabilitation Center, which houses and provides programming for about 200 individuals.

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.

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%

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 has so far found evidence of discrimination in two out of three tests for people with a disability.

Growing Population of Older Adults

Although age is not a federally protected class for fair housing, it is in King County, and is correlated 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.⁴⁴ Significant investments will be necessary to meet the increasing demand for accessible housing.

Programs, Policies, and Investments to Address Housing Access for Disabled 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. These services are provided by dozens of providers in King County.

Adult Family Homes

Housing resources for disabled individuals is also provided through adult family homes, which are located throughout King County and are offered by a number of housing providers.

Publicly Supported Senior Housing

Publicly supported housing projects that target seniors are a large percentage of King County's public housing portfolio. 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. You can learn more about this program [here](#).⁴⁵

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 recommendation to increase access to affordable housing for older adults. Key recommendations include:

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

⁴⁴ <https://www.cdc.gov/aging/pdf/state-aging-health-in-america-2013.pdf>

⁴⁵ <https://kingcounty.gov/depts/community-human-services/housing/services/housing-repair/grants.aspx>

- Create accessible housing that meets the needs of a diverse aging population

You can read the full report [here](#).⁴⁶

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⁴⁶ <http://www.agingkingcounty.org/wp-content/uploads/sites/185/2018/02/MovingTowardAgeFriendlyHousingInKingCounty.pdf>

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 individual-level discrimination in applications for rental housing is a systemic issue, despite being illegal for over 50 years. King County and partner cities chose to conduct field-testing to collect data on the nature and extent of housing discrimination in King County.

King County and partner cities contracted with the Fair Housing Center of Washington to conduct 65 differential treatment tests and 15 policy tests in jurisdictions across 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 whether they 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 midpoint report provided by the Fair Housing Center of Washington reported 11 positive test results out of 21 differential treatment tests and 2 positive results out of 4 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 midpoint report. The next set of results, along with data on fair housing complaints received by the Fair Housing Center of Washington, will be provided by July 2019.

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 whether a loan is approved or

denied, 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

Black households are more than twice as likely to be denied a loan as White households. Native Americans are also significantly more likely to be denied a loan than Whites. It is also notable that Black applicants accounted for 2.8% of mortgage applications, despite being 6% of the King County population, which reflects earlier analysis regarding the racial disparities for rental and homeownership rates. Further outreach and analysis is necessary to understand the dynamics contributing to these disparities.

This report is a draft, and will change to reflect community input. King County and partner cities welcome your feedback, and want to hear from all individuals and community organizations on what they see as the greatest barriers to fair housing choice, existing efforts to address these issues that have not been included, and what solutions would be most effective. Please attend our community meetings or contact us directly:

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King County staff are also available upon request to provide briefings to city councils, advisory boards and commissions, and other organizations on this process and key findings.

FAIR HOUSING GOALS

Informed by community input from other planning processes and the previous analysis, this section proposes a set of priority actions to achieve fair housing choice in King County. These goals are also written in the context of the programs, policies, and plans that currently seek to eliminate barriers to fair housing choice.

1. Engage underrepresented communities in participation and access to opportunities.
2. Provide more housing for vulnerable populations.
3. Provide more housing choices for people with large families.
4. Increase affordable housing resources.
5. Preserve and increase affordable housing in communities with a high risk of displacement.
6. Preserve the quality of the affordable housing stock.
7. Review and amend zoning laws to encourage mixed income and diverse communities.
8. Work with communities to engage in community revitalization efforts.
9. Invest in programs that provide education and enforcement of fair housing laws.
10. Support the Affordable Housing Committee's efforts to promote fair housing.

This report is a draft, and will change to reflect community input. King County and partner cities welcome your feedback, and want to hear from all individuals and community organizations on what they see as the greatest barriers to fair housing choice, existing efforts to address these issues that have not been included, and what solutions would be most effective. Please attend our community meetings or contact us directly:

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King County staff are also available upon request to provide briefings to city councils, advisory boards and commissions, and other organizations on this process and key findings.

CONCLUSION AND NEXT STEPS

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 is planned to be submitted to the King County Council by the beginning of September and finalized by early November. This section will be updated as next steps are identified and the report advances through the following timeline.



This report is a draft, and will change to reflect community input. King County and partner cities welcome your feedback, and want to hear from all individuals and community organizations on what they see as the greatest barriers to fair housing choice, existing efforts to address these issues that have not been included, and what solutions would be most effective. Please attend our community meetings or contact us directly:

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Appendix A: King County Demographics by Jurisdiction

Jurisdiction	Total Population	White Population	Percent White	Black Population	Percent Black	Native American Population	Percent Native American	Asian Population	Percent Asian	Hawaiian/PI Population	Percent Hawaiian/PI	Other Races Population
City of Algona	3,171	2,210	70%	166	5%	31	1%	326	10%	11	0%	283
City of Auburn	77,440	52,828	68%	3,732	5%	1,701	2%	7,632	10%	1,992	3%	3,177
Town of Beaux Arts Village	342	314	92%	0	0%	0	0%	20	6%	0	0%	4
City of Bellevue	139,014	77,733	56%	3,889	3%	370	0%	47,056	34%	414	0%	2,856
City of Black Diamond	4,378	3,785	86%	8	0%	98	2%	156	4%	0	0%	250
City of Bothell	44,082	31,607	72%	1,018	2%	236	1%	6,258	14%	58	0%	1,951
City of Burien	50,729	31,449	62%	3,599	7%	610	1%	6,202	12%	682	1%	4,970
City of Carnation	1,808	1,674	93%	10	1%	0	0%	60	3%	6	0%	0
City of Clyde Hill	3,231	2,503	77%	28	1%	8	0%	561	17%	0	0%	0
City of Covington	19,918	14,803	74%	1,056	5%	55	0%	2,154	11%	65	0%	506
City of Des Moines	31,080	18,266	59%	2,070	7%	154	0%	3,897	13%	922	3%	3,411
City of Duvall	7,683	6,952	90%	222	3%	0	0%	198	3%	0	0%	59
City of Enumclaw	11,670	9,851	84%	273	2%	91	1%	138	1%	16	0%	754
City of Federal Way	94,905	54,466	57%	10,141	11%	694	1%	13,808	15%	2,191	2%	6,452
Town of Hunts Point	423	335	79%	0	0%	0	0%	73	17%	0	0%	1
City of Issaquah	35,629	24,816	70%	1,320	4%	7	0%	7,227	20%	0	0%	817
City of Kenmore	22,154	17,714	80%	360	2%	62	0%	2,603	12%	100	0%	315
City of Kent	126,561	65,873	52%	14,415	11%	1,673	1%	25,416	20%	2,204	2%	9,244
City of Kirkland	86,772	66,732	77%	1,036	1%	282	0%	12,272	14%	60	0%	1,657
Lake Forest Park city, Washington	13,247	10,753	81%	219	2%	18	0%	1,135	9%	20	0%	250
City of Maple Valley	25,375	21,031	83%	406	2%	148	1%	1,419	6%	28	0%	341
City of Medina	3,217	2,352	73%	20	1%	0	0%	635	20%	0	0%	18
City of Mercer Island	24,768	18,554	75%	447	2%	8	0%	4,683	19%	17	0%	152
City of Milton	7,481	6,563	88%	235	3%	17	0%	213	3%	68	1%	98
City of Newcastle	11,346	7,103	63%	325	3%	12	0%	3,245	29%	0	0%	107
City of Normandy Park	6,634	5,990	90%	0	0%	0	0%	525	8%	0	0%	38
City of North Bend	6,645	5,683	86%	80	1%	0	0%	55	1%	0	0%	526
City of Pacific	7,113	4,791	67%	305	4%	57	1%	688	10%	285	4%	356
City of Redmond	60,712	35,106	58%	1,061	2%	85	0%	20,590	34%	112	0%	992
City of Renton	99,692	50,578	51%	10,046	10%	537	1%	22,397	22%	1,647	2%	6,961
City of Sammamish	62,877	42,060	67%	587	1%	78	0%	17,213	27%	76	0%	357
City of Seatac	28,597	12,019	42%	6,666	23%	261	1%	4,507	16%	706	2%	2,015
City of Seattle	688,245	472,347	69%	48,884	7%	3,799	1%	99,728	14%	2,675	0%	15,155
City of Shoreline	55,431	38,500	69%	3,517	6%	611	1%	7,799	14%	123	0%	1,902
Town of Skykomish	101	86	85%	8	8%	0	0%	4	4%	0	0%	0
City of Snoqualmie	12,944	10,526	81%	63	0%	28	0%	1,564	12%	0	0%	59
City of Tukwila	20,025	7,442	37%	3,431	17%	214	1%	4,746	24%	427	2%	1,575
City of Woodinville	11,675	9,705	83%	120	1%	14	0%	1,259	11%	29	0%	57
Town of Yarrow Point	1,184	925	78%	2	0%	0	0%	211	18%	0	0%	4
King County Total	2,118,119	1,402,793	66%	130,594	6%	14,276	1%	350,616	17%	16,522	1%	73,630
Unincorporated King County	209,820	156,768	75%	10,829	5%	2,317	1%	21,943	10%	1,588	1%	5,960

Data Source: 2017 ACS 5 Year Population Estimate

Appendix A: King County Demographics by Jurisdiction

Jurisdiction	Percent Other Races	Multiracial Population	Percent Multiracial	Hispanic or Latinx Population	Percent Hispanic or Latinx	Average Household Size	Foreign Born Population	Percent Foreign	Total Households	Percent Cost Burdened	Percent Severe Cost Burdened	Percent HHs earning <80%
City of Algona	9%	144	5%	609	19%	3.39	789	25%	990	48%	20%	53%
City of Auburn	4%	6,378	8%	11,185	14%	2.72	15,031	19%	27,280	37%	15%	47%
Town of Beaux Arts Village	1%	4	1%	4	1%	2.78	32	9%	115	37%	17%	14%
City of Bellevue	2%	6,696	5%	10,063	7%	2.47	52,871	38%	54,215	31%	14%	29%
City of Black Diamond	6%	81	2%	446	10%	2.6	318	7%	1,665	29%	16%	44%
City of Bothell	4%	2,954	7%	4,673	11%	2.58	8,819	20%	15,975	33%	14%	34%
City of Burien	10%	3,217	6%	12,342	24%	2.71	12,046	24%	18,275	41%	19%	53%
City of Carnation	0%	58	3%	280	15%	2.81	183	10%	660	35%	12%	39%
City of Clyde Hill	0%	131	4%	62	2%	2.88	667	21%	1,090	29%	16%	19%
City of Covington	3%	1,279	6%	1,423	7%	2.84	2,290	11%	6,230	29%	12%	28%
City of Des Moines	11%	2,360	8%	5,670	18%	2.6	6,687	22%	11,490	37%	16%	50%
City of Duvall	1%	252	3%	517	7%	2.96	480	6%	2,435	25%	9%	24%
City of Enumclaw	6%	547	5%	1,436	12%	2.48	1,054	9%	4,565	35%	15%	52%
City of Federal Way	7%	7,153	8%	17,181	18%	2.71	23,536	25%	34,115	40%	19%	51%
Town of Hunts Point	0%	14	3%	4	1%	2.73	75	18%	175	49%	23%	21%
City of Issaquah	2%	1,442	4%	3,043	9%	2.43	8,473	24%	14,020	32%	14%	29%
City of Kenmore	1%	1,000	5%	1,687	8%	2.54	3,838	17%	8,010	33%	14%	32%
City of Kent	7%	7,736	6%	20,152	16%	2.86	37,600	30%	42,235	40%	17%	49%
City of Kirkland	2%	4,733	5%	6,108	7%	2.37	19,345	22%	35,365	33%	14%	29%
Lake Forest Park city, Washington	2%	852	6%	712	5%	2.53	1,621	12%	5,205	33%	14%	29%
City of Maple Valley	1%	2,002	8%	1,432	6%	2.93	1,649	6%	8,425	28%	7%	22%
City of Medina	1%	192	6%	96	3%	2.74	678	21%	1,085	32%	15%	15%
City of Mercer Island	1%	907	4%	732	3%	2.5	4,587	19%	9,585	30%	16%	23%
City of Milton	1%	287	4%	558	7%	2.45	362	5%	2,850	35%	13%	32%
City of Newcastle	1%	554	5%	401	4%	2.64	3,235	29%	4,105	27%	12%	20%
City of Normandy Park	1%	81	1%	251	4%	2.36	645	10%	2,635	28%	12%	32%
City of North Bend	8%	301	5%	897	13%	2.76	751	11%	2,395	32%	19%	38%
City of Pacific	5%	631	9%	1,417	20%	2.86	928	13%	2,355	40%	18%	51%
City of Redmond	2%	2,766	5%	4,568	8%	2.46	24,315	40%	23,390	25%	11%	25%
City of Renton	7%	7,526	8%	13,642	14%	2.57	28,500	29%	37,995	38%	15%	43%
City of Sammamish	1%	2,506	4%	2,463	4%	3.01	16,475	26%	16,200	24%	9%	13%
City of Seatac	7%	2,423	8%	5,225	18%	2.8	11,619	41%	9,830	43%	17%	62%
City of Seattle	2%	45,657	7%	44,505	6%	2.11	123,919	18%	296,635	35%	15%	39%
City of Shoreline	3%	2,979	5%	5,276	10%	2.45	11,260	20%	21,670	37%	16%	41%
Town of Skykomish	0%	3	3%	0	0%	1.43	10	10%	60	37%	17%	63%
City of Snoqualmie	0%	704	5%	421	3%	3.1	1,518	12%	4,010	28%	3%	12%
City of Tukwila	8%	2,190	11%	3,007	15%	2.79	8,104	40%	7,310	45%	24%	60%
City of Woodinville	0%	491	4%	361	3%	2.45	1,532	13%	4,745	30%	11%	27%
Town of Yarrow Point	0%	42	4%	15	1%	2.75	225	19%	420	37%	21%	15%
King County Total	3%	129,688	6%	200,545	9%	2.49	467,938	40%	851,077	34%	15%	38%
Unincorporated King County	3%	10,415	5%	17,681	8%	1.89	31,871	53%	111,267	30%	13%	31%

Data Source: 2017 ACS 5 Year Population Estimate

Appendix B: Housing Discrimination Testing Midpoint Report

On January 28, 2019, the Fair Housing Center of Washington (FHCW) and King County finalized a contract to conduct an analysis of housing barriers in King County, WA from January 19, 2019 – May 31, 2019 with a final report due June 30, 2019. The analysis will utilize eighty (80) fair housing tests, of which sixty five (65) would test for differential treatment based on a protected class status and fifteen (15) would test for policy violations of fair housing laws. For these tests, a “positive” result indicates a violation of fair housing laws was observed during the test, whereas a “negative” result indicates that no violations of fair housing laws were observed. This document is the mid-report of FHCW’s progress on the contract.

As of March 27, 2019, FHCW has completed the following twenty-one (21) differential treatment tests, of which eleven (11) were positive:

Protected Class	City	Results
Familial Status	Snoqualmie	Positive
Disability	Issaquah	Negative
Familial Status	Maple Valley	Negative
Familial Status	Kent	Positive
Familial Status	Bellevue	Negative
Familial Status	Mercer Island	Positive
Familial Status	Renton	Positive
National Origin	Federal Way	Positive
National Origin	Federal Way	Negative
National Origin	Enumclaw	Negative
Race	Des Moines	Positive
Race	Kent	Negative
Religion	Shoreline	Positive
Religion	Bellevue	Negative
Religion	Covington	Positive
Religion	Bothell	Negative
Religion	Newcastle	Positive
Religion	Des Moines	Negative
Religion	Kent	Positive
Religion	Sammamish	Positive
Religion	Des Moines	Negative

As of March 27, 2019, FHCW has completed the following four (4) policy check tests, of which two (2) were positive:

Protected Class	Policy Reviewed	City	Results
Familial Status	Maternity Leave	Mercer Island	Negative
Familial Status, Disability	Maternity Leave	Issaquah	Negative
Disability	Caregivers, Assistance Animals	Renton	Positive
Disability	Caregivers, Assistance Animals	Renton	Positive

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