



CITY OF BELLEVUE

Comprehensive Plan 2044

Racially Disparate Impacts Analysis



City of Bellevue

Community Development Department
450 110th Avenue NE
Bellevue, WA 98004



Seva Workshop

3204 NE 86th St
Seattle, WA 98115

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SECTION 1 Introduction

1.1 Purpose

Washington State recently made changes to the housing element of the Growth Management Act (GMA). The changes move from language that encouraged affordable housing to language that requires Bellevue and other jurisdictions planning under GMA to plan for and accommodate affordable housing, with specific requirements for identifying sufficient land capacity for moderate, low, very low, and extremely low income households.

The changes also require jurisdictions to identify housing policies and regulations that result in racially disparate impacts, displacement, or exclusion and start the work of undoing those impacts.

The purpose of this evaluation is to start the work of analyzing the impacts of Bellevue’s housing policies and regulations through an equity lens – looking for places those policies and regulations may be having disparate impacts on particular racial or economic groups. This evaluation will inform potential changes to policies in the Comprehensive Plan relating to housing, land use and equity as part of the City’s Periodic Update.

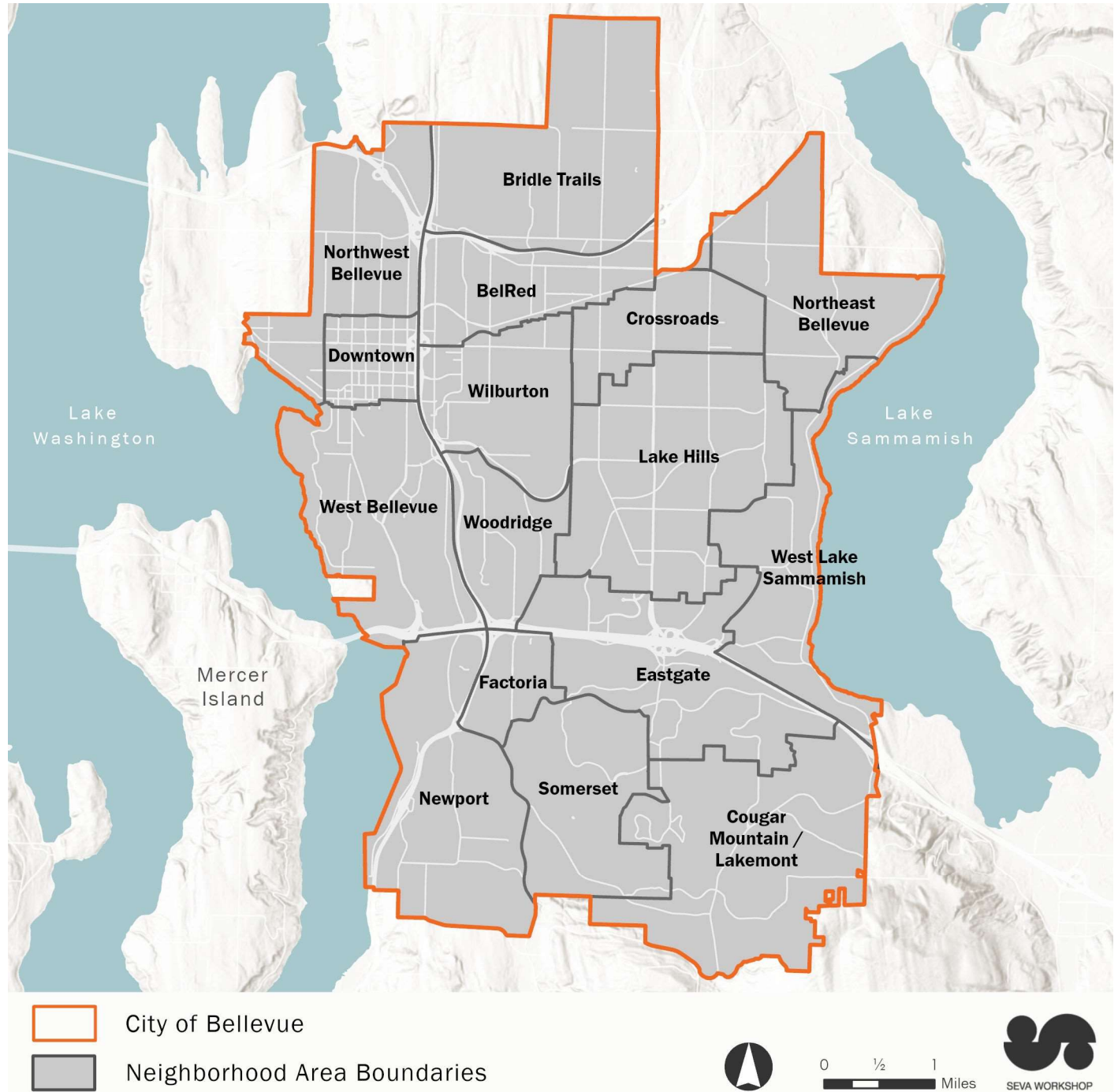
We must know where we’ve been (historic context), and where we are (current conditions), to be able to make informed decisions and have productive community conversations that guide us toward more equitable housing policies and regulations.

Equity means that a person’s identity (white, female, disabled, etc.) does not predict personal and social outcomes like income or health. Equity refers to the ability for everybody to access, participate in and benefit from services, opportunities, and activities that contribute toward a high quality of life. Equity is achieved as the City and community provide all people with equitable access, which may require providing more or different levels of support for some people, to services, programs and resources. Equity and equality are different in that way. Equality means individuals and groups are given the same resources and opportunities. Equity recognizes that some people and groups have different circumstances that require allocation of resources and opportunities in strategic or tailored ways to achieve the same outcomes.

1.2 Study Area

Bellevue is a growing, dynamic city of about 150,500 people in King County. See **FIGURE 1-1**.

FIGURE 1-1 City and Neighborhood Boundaries



SOURCE: City of Bellevue Comprehensive Plan, 2019.

1.3 Summary of Current Conditions

Through the Affordable Housing Strategy and the Comprehensive Plan, the City of Bellevue plans to create a range of housing types and densities that allow the city to maximize recent investments in transit, prioritize affordable housing for very low income families, address past inequities that have shaped the city, and to plan for residential neighborhoods that protect and promote the health and well-being of residents by supporting equitable access to parks, a clean environment, educational and economic opportunity, and transportation options.

The historical context and current conditions set the stage for the implementation of policies and programs to achieve these goals by identifying focus communities for engagement and prioritization. The analysis for this report has consistently demonstrated several themes. Sections 3 and 4 of this report contain more information on current conditions and historical context for the City.

The Crossroads, Eastgate, and Factoria neighborhoods, which proportionally house more Black and Hispanic residents, as well as other communities of color and those identifying as two or more races, have a history of under investment. These neighborhoods have higher levels of exposure to environmental hazards, more difficult access to parks, and schools with lower proportions of students meeting grade level standards.

Segregation in Bellevue by neighborhood is driven in part by the homogeneity of housing types and affordability levels in certain neighborhoods. Multi-family housing, naturally occurring affordable housing, public, and subsidized housing are concentrated in a few neighborhoods of the city, with other neighborhoods being primarily single-family homes. This effectively excludes residents with lower incomes from other parts of the city. Most White and Asian households occupy single family housing, while most Black and Hispanic households are in multi-family housing.

Rapidly rising housing prices are exacerbating wealth inequalities between homeowners and renters, a gap that already exhibited disparities along race and ethnic lines a decade ago. Roughly 41% of White, non-Hispanic households and 50% of Asian households in Bellevue rent their homes, compared to 76% of Black or African American households and 66% of Hispanic or Latino households. Comparing 2020 homeownership rates with 2010 in Bellevue, racial/ethnic disparities have persisted. While White households has experienced a decrease in homeownership, Asian households stayed the same. Black households have experienced little change in ownership rates (while the percentage increase slightly, this is from a very small base, and represents an approximate increase of less than 300 households).

Income disparities exhibit similar patterns by race, putting homeownership farther out of reach, faster, for Black households and Hispanic/Latino households. 65% of White and 72% of Asian households have incomes above 100% AMI while only 47% of Black households and 39% of Hispanic households earn above 100% AMI. Lower incomes coupled with high rents and housing costs translates to housing cost burden. Black households are the most cost burdened (38%), with Hispanic households close behind (34%). Hispanic households are the most likely to be severely cost burdened.

Income also intersects with age, where many households with a member aged 62 or over are living on low to extremely low incomes.

The housing affordability crisis has affected those with the lowest income hardest, but Bellevue is also unaffordable to many of the people who commute to work there. Around 89% of people employed in Bellevue live outside the city. Affordable and appealing housing choices convenient to Bellevue’s employment centers would support transportation and environmental goals in addition to housing goals.

Housing conditions in the City of Bellevue are at risk of growing more inequitable through displacement without specific policy and program interventions, and enforcement of Fair Housing laws. Displacement is already occurring as evidenced by eviction rates, especially along NE 10th in Downtown Bellevue between 100th Ave NE and east until the freeway, the Crossroads neighborhood, and in Eastgate. Looking to the future, the Crossroads, Lake Hills, and Highlands neighborhoods, downtown center, and areas near the highway system are estimated to have the greatest displacement risk. In 2019 the Fair Housing Center of Washington testing program observed differential treatment in Bellevue on the basis of race, disability, religion, national origin, and income.

Revising the housing policies in the Comprehensive Plan is an important part of remediating the past inequities described in Section 4 and correcting the disparities in current housing conditions described in Section 3. Section 2 provides an evaluation of racially disparate impacts of existing Comprehensive Plan policies. This report will be used to revise existing policies and prevent new policies from perpetuating and creating racially disparate impacts.



SECTION 2 **Policy Evaluation**

Policies that may appear race neutral can in effect result in exclusion in housing, displacement, and other disparate impacts. This may be due to underlying racial bias affecting the interpretation of policies, or effects that arise from the way the policy interacts with the housing marketplace, for example. This section describes the results of individual Comprehensive Plan policy review. Policies were reviewed according to an evaluative framework adapted from Department of Commerce Guidance on addressing racially disparate impacts in housing.

2.1 Rubric

The selected rubric outlines an evaluation methodology for policies of the Comprehensive Plan. This tool is designed to identify policies and regulations that result in racially disparate impacts and displacement and exclusion in housing.

Key overarching questions include:

- Does this policy contribute to racially disparate impacts or exclusion in housing?
- Is the policy effective in accommodating more housing?
- Does the policy increase displacement risk?
- Does the policy provide protection to communities of interest from displacement?
- Does the policy language include vague terms that could be used to marginalize communities of color?

Each policy in the Housing Element is reviewed using the criteria shown below. Policies from other Elements that were found to be challenging under this rubric are presented in the following section. Each policy is reviewed for the language itself as well as the policy design and potential impacts of the policy, drawing from housing policy research, the Department of Commerce resources and guidance, and

application of planning experience from multiple jurisdictions. Specific lenses through which each policy was reviewed include:

- **Language clarity and potential for bias.** Whether the policy includes use of coded or unclear language that can lead to inequitable application.
- **Deficit-based language.** Whether the policy uses language that can lead to an underappreciation of the needs and contributions of people in specific groups.
- **Impact on housing stock.** Whether the policy introduces barriers, such as excessive regulation, or incentives to overall housing stock and affordable housing to meet Bellevue’s goals.
- **Impact on housing mix and housing mix.** Whether the policy prioritizes certain residential uses, and which uses are prioritized.
- **Distribution of impact by geography, income, and community.** Whether the policy creates benefits and burden or risks that will be unevenly distributed.
- **Mitigation for anticipated impacts.** Whether the policy includes consideration of impacts and plans to mitigate them, including displacement risk.

Policies are blunt and broad instruments and their impacts, intended and unintended, unfold over years. In this review the assessment of a policy as supportive, approaching, or challenging is a useful, but highly simplified way of summarizing complex issues. Continued monitoring of housing outcomes, community engagement, and continued policy refinement will be essential for Bellevue to achieve its goals.

TABLE 2-1 Existing Policy Evaluation Framework

Criteria	Evaluation
The policy supports achieving the GMA goal for housing. There is a need for the policy and/or it addresses identified racially disparate impacts, displacement and exclusion in housing.	“S” Supportive
The policy can help achieve the GMA goal for housing but may be insufficient or does not specifically address racially disparate impacts, displacement and exclusion in housing.	“A” Approaching
The policy may challenge the jurisdiction’s ability to achieve the GMA goal for housing. The policy’s benefits and burdens should be reviewed to optimize the ability to meet the policy’s objectives while improving the equitable distribution of benefits and burdens imposed by the policy.	“C” Challenging
The policy does not affect the jurisdiction’s ability to achieve GMA goal housing and has no influence or impact on racially disparate impacts, displacement or exclusion.	“NA” Not Applicable

2.2 Findings

The below table applies the evaluation framework across policies in the existing Bellevue Comprehensive Plan’s Housing Element. As described above, each policy was reviewed for the language itself; the content and design of the policy; likely impacts on housing stock, mix, and disparities; and whether mitigation efforts are needed. A score of “S” Supportive, “A” Approaching, “C” Challenging or “NA” Not Applicable summarizes the results of this assessment.

TABLE 2-2 Housing Element Policy Evaluation

Policy	Evaluation	Rationale
<p>HO-1 Encourage investment in and revitalization of single family and multifamily neighborhoods where private investment patterns are not accomplishing this objective.</p>	A	<p>Implementation of this policy could help preserve existing affordable housing inventory and allow residents to stay in housing they can afford. It could also result in gentrification, loss of affordability and displacement for many households. Additional clarification and guidance should be provided to identify how this policy will or will not result in equitable outcomes for those who have historically been underserved in the Bellevue housing market. Consider adding community engagement to define vitality and therefore investment objectives.</p>
<p>HO-2 Promote quality, community-friendly single family, multifamily and mixed use development, through features such as enhanced open space and pedestrian connectivity.</p>	C	<p>Policy HO-2 uses broad and undefined language, including “...development quality...” and “...community-friendly.” Two potential features that could be used to implement the policy are identified. This is not an inclusive list and criteria for additional features that would implement this policy are not provided. As currently written, this policy could be used to displace and exclude communities who cannot afford or are not served by future actions used to implement this policy. Clarification of policy intent, consideration of diverse perspectives and needs, and demonstration of how underserved communities will be served and not be excluded are recommended. Consider adding or referring to anti-displacement measures and tools.</p>

Policy	Evaluation	Rationale
<p>HO-3 Maintain the character of established single family neighborhoods, through adoption and enforcement of appropriate regulations.</p>	C	<p>Policy HO-3 language, including such phrases as "...character of established single-family neighborhoods..." and "...appropriate regulations," could result in a high potential for disparate impacts to underserved communities. Subjective and undefined terms should be clarified so that an equitable balance of policy benefits and burdens is clearly understood. Clarification of the intent and implications of this policy is recommended.</p>
<p>HO-4 Monitor and appropriately regulate room rentals in single family areas.</p>	C	<p>Policy HO-4 implies that room rentals have a negative impact in single family areas and that impacts should be "...appropriately regulated." Because terms are not defined, the potential for disparate impacts to underserved communities is high. Implicit assumptions and undefined terms should be made explicit so that an equitable balance of policy benefits and burdens is clearly demonstrated. Clarification of the intent and implications of this policy is recommended.</p>
<p>HO-5 Anticipate the future maintenance and restoration needs of older neighborhoods through a periodic survey of housing conditions. Report results of such surveys to residents.</p>	S	
<p>HO-6 Provide financial assistance to low-income residents for maintaining or repairing the health and safety features of their homes through the Housing Repair Program, or similar program.</p>	A	<p>While not specifically an equity issue, the use of the term low-income resident or person is now recognized as deficit-based language that focuses on what people lack. Instead use specific, person-first language such as "people with low or lower incomes." In addition, clarify whether the intended beneficiaries are both homeowners and renters? If yes, "residents" works. Otherwise, specific language needs to be added.</p>
<p>HO-7 Encourage the development of affordable housing through incentives and other tools consistent with state-enabling legislation.</p>	S	

Policy	Evaluation	Rationale
HO-8 Employ effective strategies that support the Fair Housing Act and affirmatively further fair housing.	S	
HO-9 Encourage development of appropriate amenities for families with children throughout the city through investments, development regulations and incentives.	S	
HO-10 Work with colleges, including Bellevue College, and private developers to support housing for students on-campus and in adjacent transit served mixed use/ commercial areas.	S	
HO-11 Encourage housing opportunities in mixed residential/ commercial settings throughout the city.	S	
HO-12 Provide incentives to encourage residential development for a range of household types and income levels in multifamily and mixed use commercial zones.	S	
HO-13 Ensure that mixed-use development complements and enhances the character of the surrounding residential and commercial areas.	A	Policy HO-13 seeks to ensure that mixed use development “...complements and enhances...” surrounding residential and commercial areas. This policy may present a barrier to achieving Bellevue’s housing goals, especially for affordable units. Subjective terms in this policy should be defined. Consider how this policy will or will not result in equitable outcomes for those who have historically been underserved in the Bellevue housing market.
HO-14 Provide opportunity to allow a demonstration project through methods such as an interim ordinance enabling a demonstration project(s) that would serve as a model for housing choices currently not being built in Bellevue.	S	
HO-15 Allow attached accessory dwelling units in single family districts subject to specific development, design, location, and owner occupancy standards. Allow detached accessory dwelling units where expressly allowed by neighborhood subarea plans.	C	Policy HO-15 supports accessory dwelling units (ADUs) in single family districts subject to specific development regulations. Substantive and procedural requirements that reduce development feasibility and/or increase costs may make it difficult or impossible to develop ADUs. In particular, the requirement for

Policy	Evaluation	Rationale
		<p>specific subarea plan policy approval may effectively preclude detached ADUs in many areas of the city. This policy and implementing measures should be reviewed to ensure an equitable distribution of benefits and burdens imposed by the policy and supporting regulations.</p>
<p>HO-16 Provide opportunities and incentives through the Planned Unit Development (PUD) process for a variety of housing types and site planning techniques that can achieve the maximum housing potential of the site.</p>	S	
<p>HO-17 Evaluate the housing cost and supply implications of proposed regulations and procedures.</p>	S	<p>Suggest that housing cost and supply evaluations be disaggregated to show disparate racial impacts.</p>
<p>HO-18 Promote working partnerships with housing developers to help create a variety of housing types in the community.</p>	S	
<p>HO-19 Support housing options, programs, and services that allow seniors to stay in their homes or neighborhood. Promote awareness of Universal Design improvements that increase housing accessibility.</p>	A	<p>Policies HO-19 and HO 20 address housing services for older adults. While not specifically an equity issue, the use of such terms as “senior, elderly, or aged” evoke negative stereotypes and can lead to othering toward and bias against for older adults. Instead of those terms, consider more neutral phrases, such as “older adult, “older person,” or “persons over 65.”</p>
<p>HO-20 Encourage a range of housing types for seniors affordable at a variety of income levels.</p>		<p>Policy HO-20 encourages a range of housing types for older adults at a variety of income levels. To reduce the potential for disparate impacts, displacement and exclusion in housing, the balance of needs for those at all income levels and of those who have historically been underserved in the Bellevue housing market should be considered.</p> <p>Recognize that use of universal design techniques to increase housing accessibility is not just an issue for older adults.</p>
<p>HO-21 Address the entire spectrum of housing needs, including the need for housing affordable to very low, low, and moderate</p>	S	<p>Consider deleting "address the entire spectrum of housing needs," to focus the policy more clearly on the needs of</p>

Policy	Evaluation	Rationale
income households, through the city's affordable housing programs.		very low, low and moderate income households.
HO-22 Work cooperatively with King County, A Regional Coalition for Housing (ARCH), and other Eastside jurisdictions to assess the need for, and to create, affordable housing.	S	
HO-23 Encourage the development of affordable housing through incentives and other tools consistent with state-enabling legislation.	S	
HO-24 Develop and implement an effective strategy to ensure affordable housing opportunities are available in Downtown and throughout the city at a range of affordability levels. Monitor quantity, types, and affordability of housing achieved for potential unintended consequences and to determine if the need is being met	A	Policy HO-24 supports affordable housing opportunities throughout the city at a range of affordability levels. The policy also discusses monitoring for "...potential unintended consequences." New housing is not typically monitored for potential unintended consequences, and it is not clear why affordable housing would be treated differently. Clarification or removal of this part of the policy is recommended.
HO-25 Provide funding to support housing need, especially for low and very low income households. Assess housing fund guidelines on a regular basis to ensure they are consistent with changing community needs and priorities.	S	
HO-26 Provide incentives and work in partnership with not-for-profit and for-profit developers and agencies to build permanent low- and moderate-income housing.	S	
HO-27 Encourage preservation, maintenance and improvements to existing affordable housing.	S	
HO-28 Explore all available federal, state, and local programs and private options for financing affordable housing.	S	
HO-29 Explore financial incentives to encourage affordable housing, such as partial exemptions from city permit fees, the state property tax exemption program and other state enabled programs.	S	
HO-30 Ensure that all affordable housing created in the city with public funds or by	S	

Policy	Evaluation	Rationale
regulation remains affordable for the longest possible term.		
HO-31 Participate in relocation assistance to low-income households whose housing may be displaced by condemnation or city-initiated code enforcement.	S	
HO-32 Evaluate surplus city land for use for affordable housing.	S	
HO-33 Implement Affordable Housing Strategy C-1 by providing bonuses and incentives to increase permanently affordable housing on any qualifying property owned by faith-based or non-profit housing entities, or on surplus property owned by public entities.	S	
<p>HO-34 Implement the bonuses and incentives for qualifying properties to respond to the different conditions of multifamily and single family land use districts that are outside of Downtown, BelRed, and Eastgate TOD.</p> <p><i>Discussion: Adopting permanently affordable housing bonuses and incentives that respond to the different conditions for multifamily and for single family districts for the purpose of creating flexibility in development standards is needed to achieve bonus affordable housing units on qualifying properties. Amending these standards for use in by-right development processes will address the look and feel of housing structures, variations in the type of housing, and dimensional standards.</i></p>	A	<p>Policy HO-34 language is unclear and has not been evaluated for equity impacts. While the goal appears to be laudable (create more affordable housing through density bonuses) it appears to be written for a specific case, not for the broad guidance needed in a comprehensive plan.</p>
HO-35 Adopt an interim ordinance enabling a demonstration project including affordable housing and is consistent with Policy HO-14, on qualifying non-profit housing entity-owned property and when located in a multifamily land use district and is on an arterial. The interim ordinance shall address standards and requirements for site proximity to transit, residential development capacity, and other land use dimensional incentives for the additional development of permanently affordable housing	S	
HO-36 Recognize that adult family homes and other state regulated special needs housing provide stable, neighborhood housing options for elderly and disabled residents. Work to		<p>While not specifically an equity issue, the use of such terms as “senior, elderly, or aged” an “disabled” evoke negative stereotypes and can lead to othering</p>

Policy	Evaluation	Rationale
address needs for services, emergency response and other potential accommodation.		toward and bias. Consider more neutral and person first language, such as “older adults” “persons over 65” and “persons living with a disability.”
HO-37 Provide reasonable accommodation for housing for people with special needs in all areas, and avoid concentrations of such housing, while protecting residential neighborhoods from adverse impacts.	C	Consider deleting “...reasonable accommodation...” from this policy to simplify and more accurately describe the city’s role in providing for housing for people with special needs. Clarify assumptions regarding avoiding concentrations and adverse impacts to residential neighborhoods. Implicit assumptions and undefined terms should be made explicit so that an equitable balance of policy benefits and burdens is clearly demonstrated. Clarification of the intent and implications of this policy is recommended.
HO-38 Support regional efforts to prevent homelessness, and make homelessness rare, brief, and one time when it occurs. Provide a range of affordable housing options and support efforts to move homeless persons and families to long-term financial independence.	S	
HO-39 Collaborate with other jurisdictions and social service organizations to assure availability of emergency shelters and day centers that address homelessness.	S	
HO-40 Support and plan for assisted housing using federal or state aid and private resources.	S	

SOURCE: Seva Workshop, 2023.

The table below applies the evaluation framework across policies in the existing Bellevue Comprehensive Plan’s remaining Elements. Only policies with an A or C evaluation are included below. The number of policies included per element are:

- Citizen Engagement Element (3)
- Land Use Element (8)
- Neighborhoods Element (2)
- Capital Facilities Element (1)
- Transportation Element (3)
- Urban Design and the Arts (10)

TABLE 2-3 Non-Housing Element Policy Evaluation

Policy	Evaluation	Rationale
<p>CE-2 Consider the interests of the entire community and the goals and policies of this Plan before making land use decisions. Proponents of change in land use should demonstrate that the proposed change responds to the interests and changing needs of the entire city, balanced with the interests of the neighborhoods most directly impacted by the project.</p>	C	<p>Without explicit direction otherwise, balancing the “interests of the entire city with the interests of the neighborhoods most directly impacted by the project” can lead to majority-rule decision-making, which often serves to dilute or silence the voices of those most impacted by the decision who tend to be in the minority. Consider emphasizing the role of those most directly impacted by the project, especially if they overlap with historically underserved populations.</p>
<p>CE-3 Ensure that the process which identifies new commercial areas or expands existing areas considers the impacts of potential development on affected residential neighborhoods and results in decisions that are consistent with other policies in the Comprehensive Plan.</p>	A	<p>Consider strengthening policy language to ensure that the housing impacts of commercial expansion are not only considered in the process but addressed with specific anti-displacement tools.</p>
<p>CE-4 Balance the interests of the commercial and residential communities when considering modifications to zoning or development regulations.</p>	C	<p>Without explicit direction otherwise, balancing the interests of commercial and residential communities will likely lead to replication of existing power dynamics. Consider adding and emphasizing interests of underserved populations also.</p>
<p>LU-1 Promote a clear strategy for focusing the city’s growth and development as follows:</p> <ol style="list-style-type: none"> 1. Direct most of the city’s growth to the Downtown regional growth center and to other areas designated for compact, mixed use development served by a full range of transportation options. 2. Enhance the health and vitality of existing single family and multifamily residential neighborhoods. 3. Continue to provide for commercial uses and development that serve community needs." 	A	<p>Consider incorporating equity consideration as part of the strategy.</p>
<p>LU-13 Support neighborhood efforts to maintain and enhance their character and appearance.</p>	C	<p>“Character and appearance...” are subjective terms that could be used to exclude groups and housing types from</p>

Policy	Evaluation	Rationale
<p>LU-14 Protect residential areas from the impacts of non-residential uses of a scale not appropriate to the neighborhood.</p>	C	<p>existing neighborhoods. Clarify the intent and implications of this policy.</p> <p>“Appropriate” is a subjective term that could be used to exclude groups and housing types from existing neighborhoods. Consider rephrasing the policy to remove the assumption that scale has only negative impacts from which residents require “protection.”</p>
<p>LU-18 Encourage new neighborhood retail and personal services in locations that are compatible with the surrounding neighborhood, allow for ease of pedestrian access, and enhance neighborhood character and identity.</p>	C	<p>“Character and identity...” and “compatibility” are subjective terms that could be used to exclude groups and housing types from existing neighborhoods. Clarify the intent and implications of this policy and consider inclusive community engagement to define desired character and identity.</p>
<p>LU-19 Support mixed residential/commercial development in all Neighborhood Business and Community Business land use districts in a manner that is compatible with nearby uses.</p>	C	<p>“Compatibility” in this policy should be defined. Development should also assess the distribution of benefits and burdens for Bellevue residents, especially those who have historically been underserved in the Bellevue housing market.</p>
<p>LU-25 Assess the compatibility of commercial uses and other more intense uses when located in mixed use and predominantly residential areas.</p>	C	<p>“Compatibility” in this policy should be defined. Consider the need to assess the distribution of benefits and burdens for Bellevue residents, especially those who have historically been underserved in the Bellevue housing market.</p>
<p>LU-27 Encourage the master planning of multi-building and multi-parcel developments and large institutions to emphasize aesthetics and community compatibility. Include circulation, landscaping, open space, storm drainage, utilities, and building location and design in the master plan.</p>	C	<p>Incorporate language that recognizes that, rather than emphasizing aesthetics and community compatibility, these considerations should be evaluated in balance with other city priorities, such as the provision of housing and services to under-served groups. “</p>
<p>LU-29 Help communities to maintain their local, distinctive neighborhood character, while recognizing that some neighborhoods may evolve.</p>	C	<p>“Local, distinctive neighborhood character...” is a subjective term that could be used to exclude groups and housing types from existing neighborhoods. This language may also restrict Bellevue’s ability to achieving housing goals. Policy language could be strengthened to recognize that all neighborhoods evolve.</p>

Policy	Evaluation	Rationale
		Clarify the intent and implications of this policy and consider inclusive community engagement to define desired character.
N-9 Preserve and develop distinctive neighborhood character within Bellevue’s diverse neighborhoods.	C	“Distinctive neighborhood character...” is a subjective term that could be used to exclude groups and housing types from existing neighborhoods. This language may also restrict Bellevue’s ability to achieving housing goals. If “diverse neighborhoods” is intended to refer to a subset of all neighborhoods, specify with geographic terms or metrics of diversity.
N-11 Enable neighborhood-tailored solutions to localized issues while ensuring that they meet citywide and regional planning objectives.	A	Consider specifying how localized issues are identified and measures to ensure the process is inclusive.
CF-20 Work to site or expand essential public facilities in ways that equitably balance social, environmental, and economic impacts to achieve citywide and regional planning objectives.	A	Consider adding “historical impacts” to the list to create opportunity to address past inequities.
TR-7 Ensure that land use changes near high capacity transit stations are consistent with the Comprehensive Plan, recognizing that: <ol style="list-style-type: none"> 1. Transit may support more intense development around some stations. 2. Transit supportive design and orientation may be implemented without changes to land use intensity; and 3. Land use plan map changes would be precluded in existing single-family designations and environmentally sensitive areas." 	A	In TR-7(3), consider policy direction that could allow for changes to single family designations where housing and services to historically under-served groups would be provided.
TR-119 Work with state agencies to incorporate enhancements to minimize neighborhood impacts when improving state highways.	A	For policies that reference neighborhood impacts integrate data analysis to identify and mitigate disparate impacts across groups of residents and business owners.
TR-135 Develop the transportation system in Bellevue to minimize environmental and neighborhood impacts, while addressing the city’s long-term transportation and land use objectives.	A	For policies that reference neighborhood impacts integrate data analysis to identify and mitigate disparate impacts across groups of residents and business owners.

Policy	Evaluation	Rationale
UD-7 Support neighborhood efforts to maintain and enhance their character and appearance.	C	"Neighborhood character and appearance..." can be defined in exclusionary ways.
UD-11 Develop Downtown and other mixed-use areas to be functional, attractive and harmonious with adjacent neighborhoods by considering through-traffic, view, building scale, and land use impacts.	C	"Functional, attractive, and harmonious..." can be defined in exclusionary ways.
UD-43 Permit high intensity development subject to design criteria that assures a livable urban environment.	A	Define the term "high-intensity." Include or refer to criteria for "livability" and "design". Specify if this policy applies to specific geographic zones or if it is citywide.
UD-44 Incorporate the character of the surrounding community into the architecture, landscaping and site design of commercial and mixed use centers.	C	"Community character..." can be defined in exclusionary ways.
UD-45 Ensure that perimeter areas of more intense developments use site and building designs that are compatible with and connect to surrounding development where appropriate.	A	Define the term "more intense" or refer to specific criteria.
UD-47 Mitigate potential impacts to surrounding neighborhoods using landscaping, greenspace and other urban design elements.	A	Specify types of impacts to be mitigated.
UD-55 Exemplify the Pacific Northwest character through the use of appropriate plants in new landscaping.	C	Contains subjective terms "Pacific Northwest character" and "appropriate plants." If the intent is to "use native plantings in new landscaping", simplify to say as much.
UD-75 Minimize the removal of existing vegetation when improving streets to preserve the natural character of Bellevue.	A	Consider striking the subjective last clause "to preserve the natural character of Bellevue."
UD-76 Work closely and cooperatively with regional transit providers in the planning and design of transit facilities to ensure that the design of the facilities reflects the general character of Bellevue and the surrounding neighborhoods.	C	"general character of Bellevue" is a subjective term that can be interpreted in exclusionary ways.

SOURCE: Bellevue Comprehensive Plan, 2015; Seva Workshop, 2023.

2.3 Conclusion

This Comprehensive Plan is a significant opportunity to revise policies and improve equity in housing and other outcomes in the City of Bellevue. The current housing situation is one of great disparity. Some residents are more likely to own houses, live in single-family units, attend high quality schools and parks, and live relatively near to their place of work where they earn a high income for the area. These residents are unlikely to count housing costs and the potential of being displaced from their home and community among their daily stressors. Other residents have a quite different experience. They are more likely to be paying more than one-third (or over one half) of their income for housing, more likely to be exposed to and vulnerable to environmental health threats, living in more crowded or poorer quality units, and unable to find homeownership opportunities. In Bellevue, race and ethnicity are predictors of which group a resident is likely to be in. Asian and white residents in the former. Black and Hispanic/Latino residents in the latter. Income and age are also related to the likelihood of finding and maintaining housing in Bellevue.

As the unifying long-term policy document for City planning, the Comprehensive Plan guides investments and decisions that can mitigate and rectify these disparities. Several themes describe the equity revisions in the updated plan. First, the revisions provide more specific language that can be enforced objectively. This was the most common type of revision. Subjective terms such as “community character” or “appropriate” appeared in numerous policies, and could be interpreted in exclusionary ways. In many cases these terms were removed from the policy altogether. Other language edits included to further define or clarify subjective terms such as “high-impact.” In this case, better definition of the specific impacts that are the intended subject of the policy and a description of the threshold that is considered “high” will lead to more equitable application of the policy. We also identified some opportunities to rephrase deficit-based language that can have a more subtle effect of creating or reinforcing biases against a community.

In several instances, the revisions encourage community engagement and data analysis to make decisions based on current and nuanced understanding of needs and desires. Certain concepts like “quality of life” evolve and differ between community groups. Opportunities for affected communities to define quality of life, neighborhoods, and housing can provide important direction for City planning. Also in this vein, some revisions were needed to prioritize and seek out the input of groups most affected by the policy, rather than relying on city-wide data or on the voices of the most pro-active constituents by default.

Finally, the updates also reframe the distribution of public resources to consider historical context and greatest needs as a metric for investment. In some cases, historical context is explicitly added to the policy as criteria for decision-making. In other cases, the policy is strengthened by added consideration of potential disparate impacts and mitigating them, such as integrating anti-displacement measures.

Decades of racist and exclusionary policies are difficult to undo, however, and City actions will occur in the context of a dynamic and changing housing market. As described earlier in this document, the current patterns of disparities in housing and property access stem from before Bellevue was even incorporated as a city. Monitoring the implementation of the plan will be crucial to ensure effectiveness. We also recommend monitoring outcomes to keep track of the market and for early detection of any potential negative unintended consequences.

Implementation Monitoring

- Track total community engagement with related events. Identify and track engagement with specific communities of interest as identified in Section 2. For example, the communities of Crossroads, Eastgate and Factoria; Black/African American residents, Hispanic/Latino residents. Older adults, those living with disabilities, and the city's workforce should all be priority communities.
- Monitor the distribution of resources including housing investment funds and staff time by geography/neighborhood and types of beneficiaries (those identified above).
- Conduct annual equity reviews with line staff to assess whether updated language is meeting the goal of consistent and objective interpretation. Work with staff to further clarify any unclear language.
- Set goals for and track funds raised and unlocked for affordable housing development. Identify neighborhoods and tracts that lack affordable housing.
- Set and track annual or biannual goals for quantity, types, and affordability of housing achieved.

Outcomes and Context Monitoring

- Conduct a periodic updates of key data, including outcomes such as housing cost burden Cost Burden 3.3.4), affordability gap (Section 3.3.2), and location quotients by race and income (Section 3.4.1), evictions (Section 3.5.1). Additional context such as rental and sales market trends and vacancy can also be helpful to monitor.
- Inventory permanently affordable housing and affordable housing conditions at various levels of affordability (Section 3.4.2 & Section 3.4.3).
- For specific anti-displacement measures, use programmatic evaluation data as well as staff and community review to determine effectiveness and to improve tools.



SECTION 3 **Current Conditions**

The historical context described in Section 4 describes the specific ways in which communities of color in the City of Bellevue have been disadvantaged in accessing housing for decades. This following section on current conditions describes the outcomes and impacts of those accumulated disadvantages and the current housing situation. The outcomes of discrimination and policy are complex and intertwined with the overall dynamics of the housing market and population growth. This section follows Department of Commerce guidance on collecting and presenting the best available data to identify and describe patterns in housing conditions, exclusion, displacement, and future displacement risk. While no indicator alone is sufficient to demonstrate racially disparate impacts, a clear pattern of differential access to affordable housing and differential risks to future displacement emerges across the various indicators.

The City of Bellevue has explicit goals that include addressing past inequities, prioritizing very low income affordable housing, and ensuring equitable access to amenities across communities and neighborhoods. As such, the indicators selected in the following section provide a baseline for progress on these goals in addition to describing current conditions.

3.1 Communities of Interest

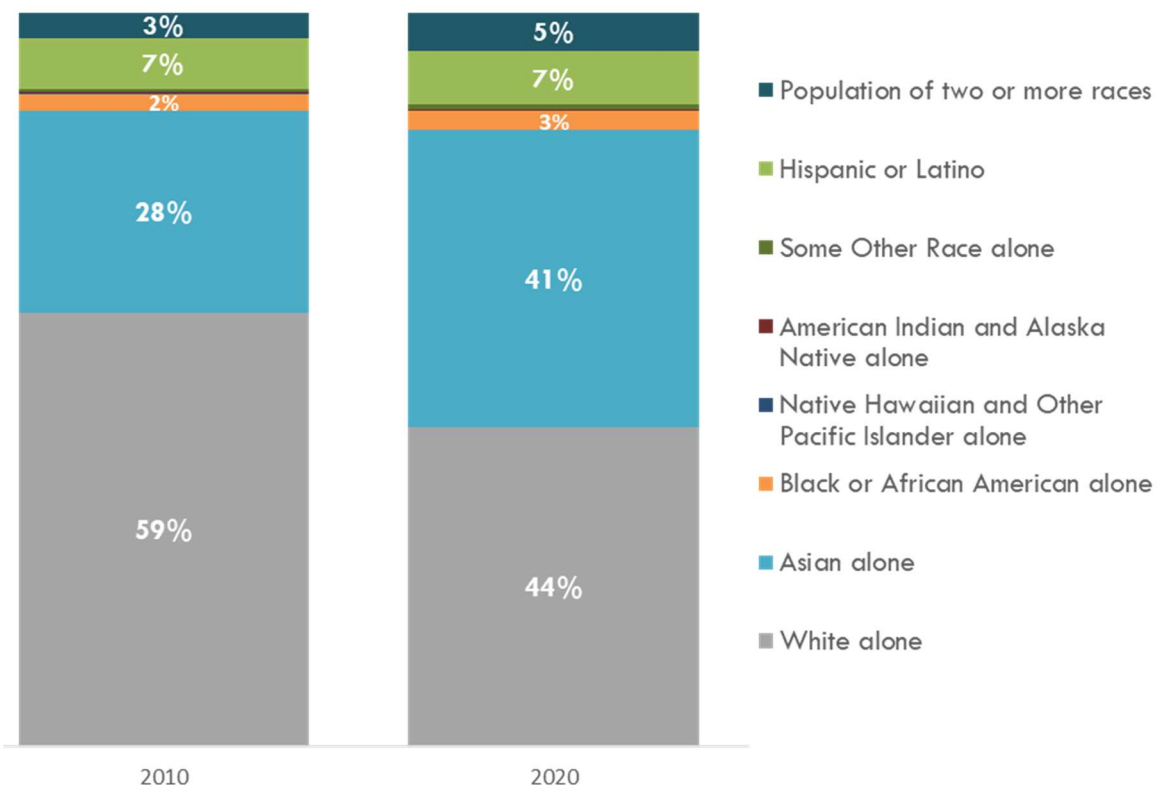
This section identifies the communities for which the housing element review assesses disparate outcomes, exclusion, and displacement in housing. The Growth Management Act requires jurisdictions to assess disparate impacts by race, which could be interpreted to include ethnic communities such as Hispanic and Latino and indigenous communities. The primary data source for the demographic analysis is the U.S. Census. As such we are limited by the definitions of race and ethnicity used in the Census instruments. For example, in Bellevue, it is important to note that all Asian communities are grouped together under a single race category in the census, comprising 41% of Bellevue's population. This hides the wide variety of income, education and health backgrounds between subgroups within this broad category. The limited

view provided by Census data should be regarded as a starting point and complemented with local consultation and data sources.

Based on the 2022 Housing Needs Assessment (HNA), communities of interest include all Black, Indigenous, and other People of Color (BIPOC) groups. As of 2020, Bellevue’s BIPOC population represents 56% of the total population. See **FIGURE 3-1**

Older adults (62 years and older), people with lower incomes, people with disabilities, and the city’s workforce are also communities of interest.

FIGURE 3-1 Population by Race and Ethnicity



SOURCES: US Census 2010 & 2020; Seva Workshop, 2023.

3.2 Desired Housing Outcomes

Based on the Affordable Housing Strategy and engagement for the Comprehensive Plan, desired housing outcomes are:

1. A range of housing types and densities that allow the city to maximize recent investments in transit.
2. Affordable housing for very low income families.
3. Strategies to address past inequities that have shaped the city.

4. Residential neighborhoods that protect and promote the health and well-being of residents by supporting equitable access to parks, a clean environment, educational and economic opportunity, and transportation options.

3.3 Current Conditions

The experience of accessing and maintaining housing in the City of Bellevue is very likely to differ based on racial and/or ethnic identity and income. As demonstrated in the following series of analyses, these two factors are associated with where in the city one lives, the likelihood of owning versus renting, the degree of housing cost burden experienced, the likelihood of your children meeting grade level standards, exposure to environmental hazards, and access to parks and open space.

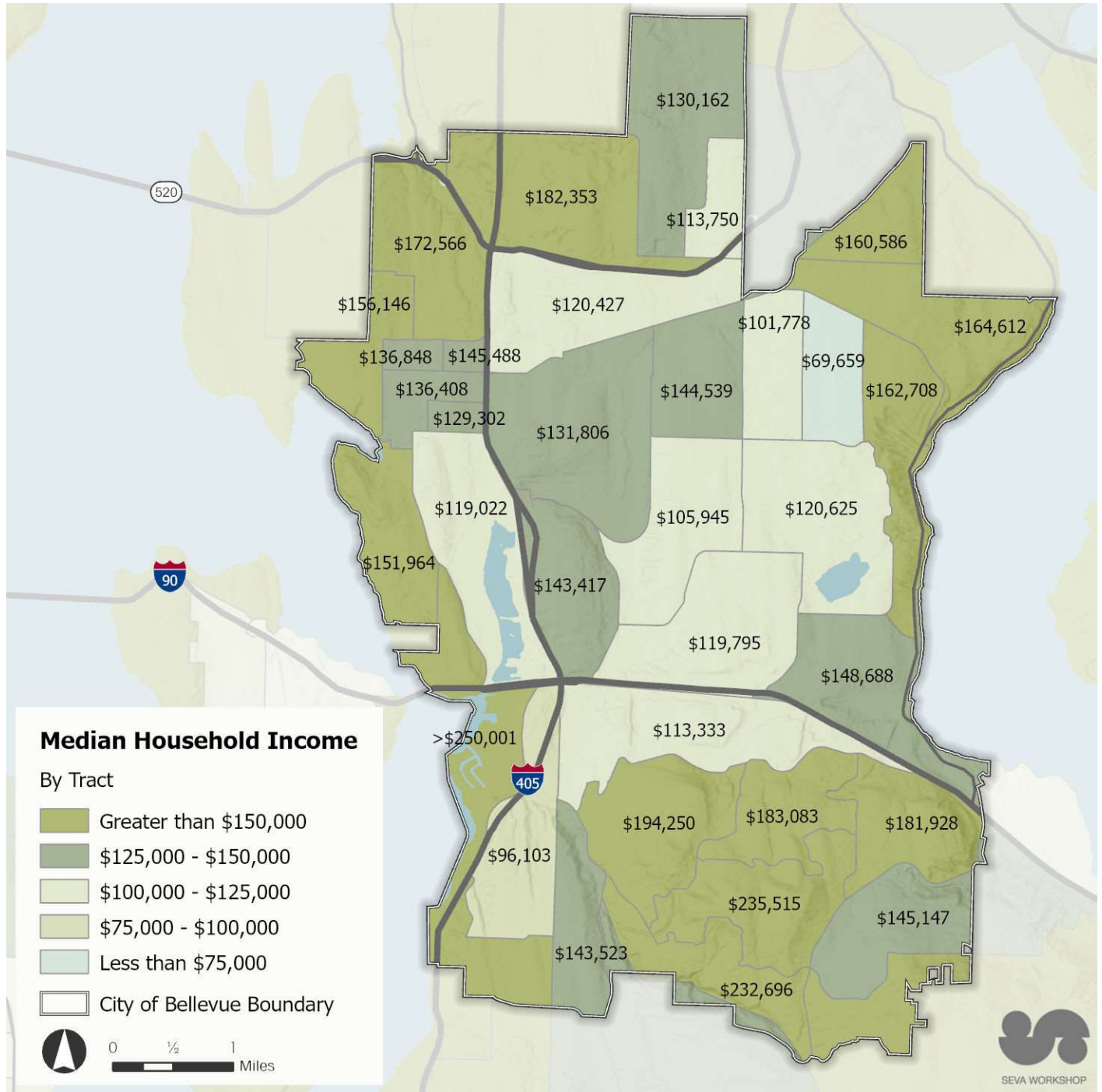
3.3.1 Household Income

According to the most recent American Community Survey, the median household income in Bellevue (\$140,252) is 32% higher than that of King County as a whole (\$106,326). However, for the purposes of U.S. Department of Housing and Urban Development (HUD) programs, Bellevue is part of the Seattle-Bellevue Metro Area. This entire area shares an Area Median Income (AMI) of \$124,600. The HUD AMI is used as the base metric for several affordability measures and program thresholds. In this manner, HUD funded housing affordability measures are less effective in Bellevue because it is a relatively high income, high cost area.

FIGURE 3-2 shows the geographic distribution of Bellevue residents by median household income. Bellevue's neighborhoods show a wide range of income levels. Households in the Crossroads and Lake Hills neighborhoods have relatively lower median incomes. Areas around I-90, Factoria, Wilburton and Northwest Bellevue also include households with lower incomes. Areas around the waterfront, especially the Newport waterfront, have households with the highest incomes in the city. The median household income here was more than \$250,000.

Areas of the city with larger proportions of Black and Hispanic residents, and other communities of color, such as in the Crossroads, Eastgate and Factoria neighborhoods, have relatively lower median household incomes. These areas also contain a higher proportion of the City's affordable housing, both naturally occurring, and subsidized. The highest income census tracts, along the waterfront south of I-90, West Bellevue, Northwest Bellevue, Bridle Trails, Northeast Bellevue, and the Lakemont neighborhood in southeast are also areas that tend to have lower proportions of Black and Hispanic residents.

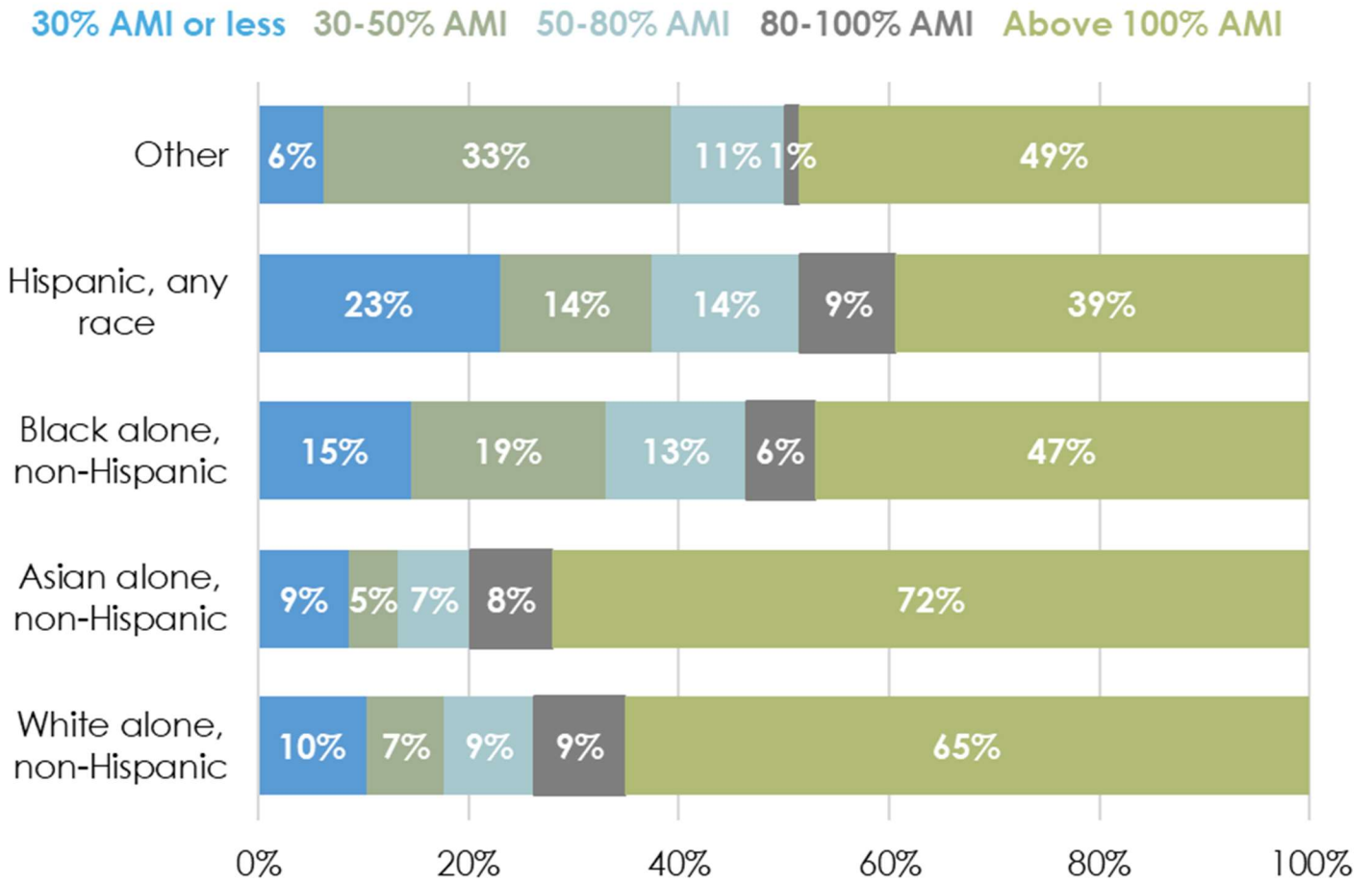
FIGURE 3-2 Median Household Income in Bellevue by Census Tract, 2021



SOURCES: US Census ACS 2017-2021 5-year estimates; Seva Workshop, 2023.

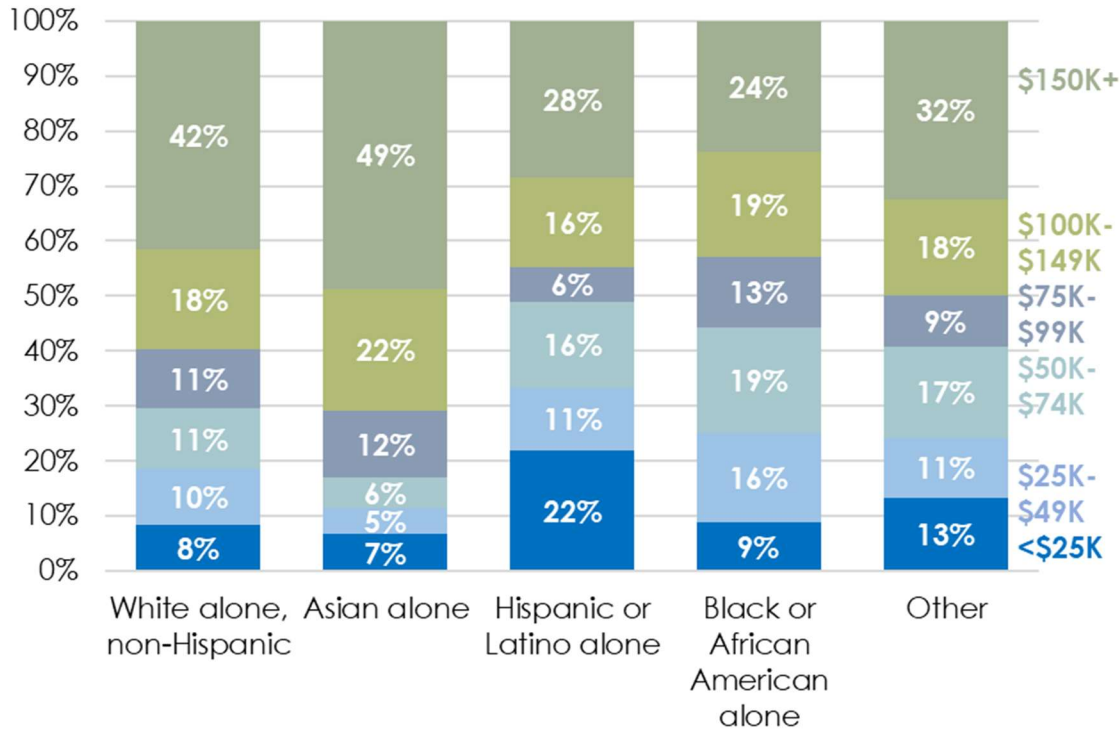
Median Income in Bellevue, by Race and Ethnicity: In Bellevue, White and Asian households are more likely to be in higher income brackets than Black or Hispanic households. See **FIGURE 3-3** and **FIGURE 3-4**. Note that 65% of White and 72% of Asian households have incomes above 100% AMI while only 47% of Black households and 39% of Hispanic households earn above 100% AMI. See **FIGURE 3-5**.

FIGURE 3-3 Percentage of Households by AMI and Race, Bellevue, 2018



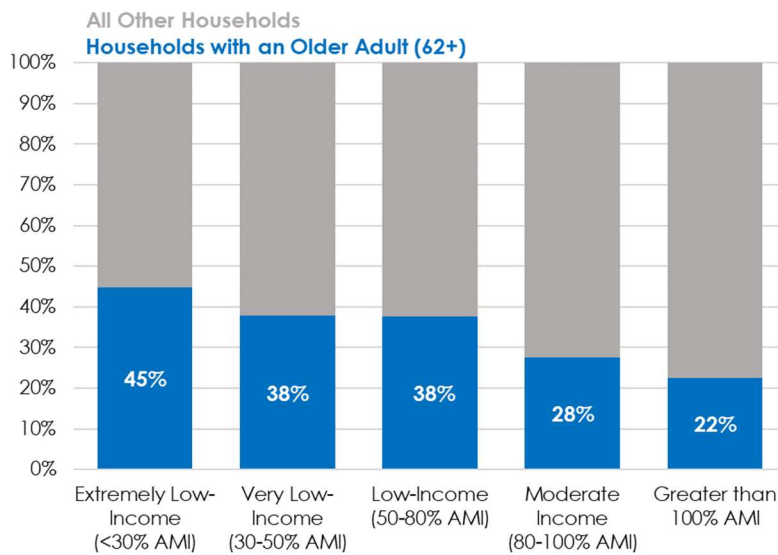
SOURCE: HUD CHAS, 2014-2018; CAI, 2022.

FIGURE 3-4 Percentage of Household by Median Household Income and Race and Ethnicity, Bellevue, 2020



SOURCE: U.S. Census ACS, 2016-2020; Community Attributes, 2022.

FIGURE 3-5 Income Brackets for Older Adult Households (62+), Bellevue, 2019

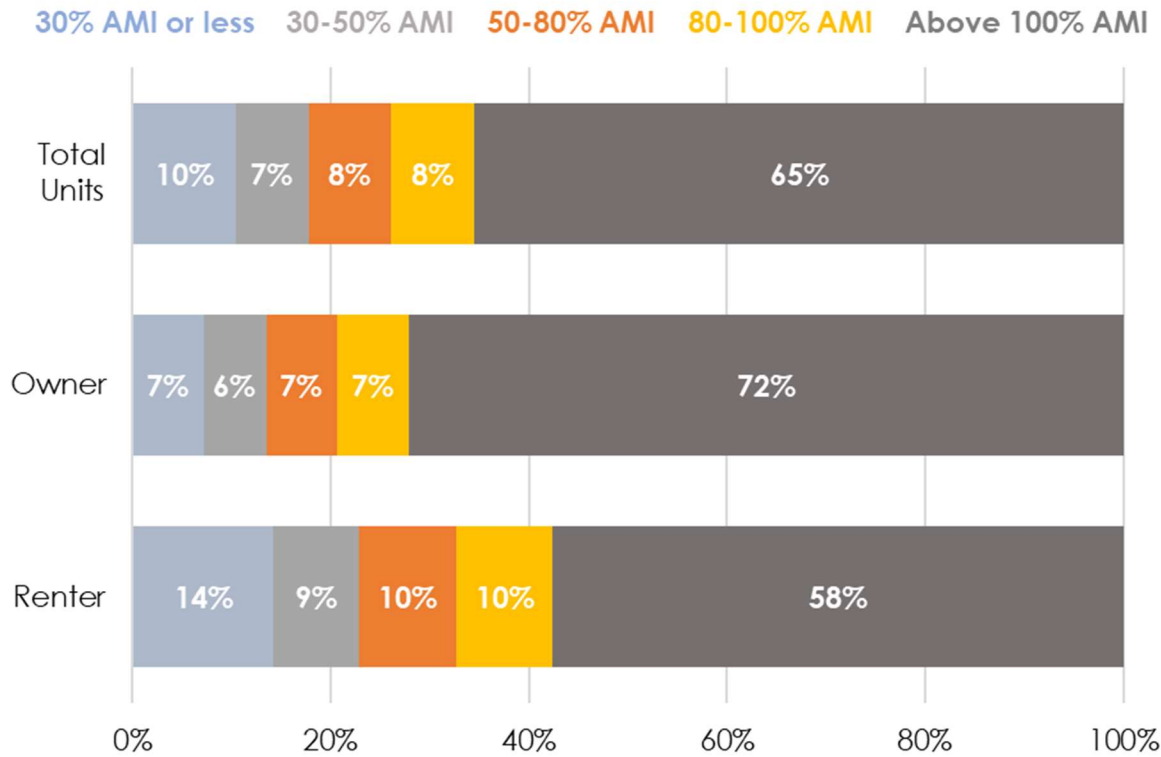


SOURCE: HUD CHAS (based on ACS 2016-2019 5-Year estimates); CAI, 2022.
NOTE: AMI = HUD Area Median Family Income.

3.3.2 Homeownership Rates and Housing Costs

Income relates to ownership status – with higher income earners more likely to be homeowners. Bellevue’s patterns in homeownership status reflect this fact as well as the patterns found in income in the preceding subsection. 72% of homeowners have incomes above the 100% AMI compared with 58% of renters. See **FIGURE 3-6**

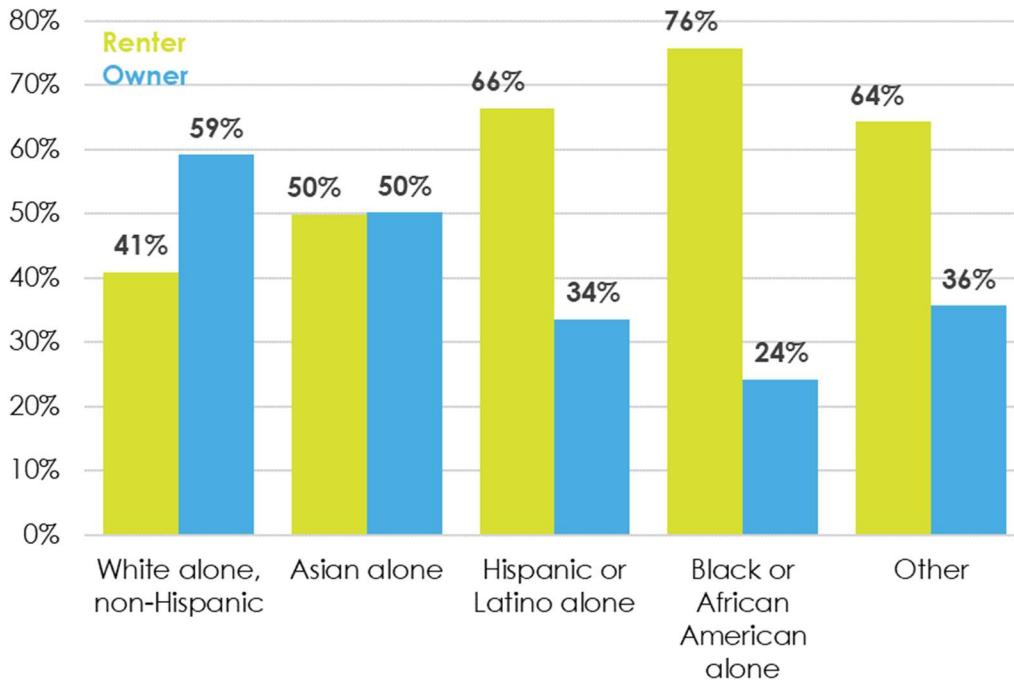
FIGURE 3-6 Percentage of Households by AMI and Tenure, Bellevue, 2019



SOURCE: HUD CHAS (based on ACS 2016-2019 5-Year estimates); CAI, 2022.

Communities of color are more likely to be renters than owners. Roughly 41% of White, non-Hispanic households and 50% of Asian households in Bellevue rent their homes, compared to 76% of Black or African American households and 66% of Hispanic or Latino households.

FIGURE 3-7 Households by Race and Tenure, Bellevue, 2020



SOURCE: American Community Survey, 2016-2020; CAI, 2022.

Home ownership typically requires substantial savings for a down payment, along with a credit history and income source that lenders deem acceptable. Many BIPOC households struggle with some or all these criteria, restricting access to this wealth-building opportunity.¹ The homeownership rates for Black and Hispanic/Latino households are well below those for white households nationally and statewide; and rates in Bellevue lag further compared to these reference points. See **TABLE 3-1** and **FIGURE 3-8**

TABLE 3-2 Home Ownership Rates

	United States	Washington State	Bellevue
Black	45%	31%	24%
Hispanic	49%	45%	34%
White (non-Hispanic)	74%	68%	59%

Racial/ethnic disparities in homeownership have been persistent across the years. Comparing 2020 homeownership rates with 2010 in Bellevue, racial/ethnic disparities have persisted. While White households has experienced a decrease in homeownership, Asian households stayed the same. Black households have experienced little change in ownership rates (while the percentage increase slightly, this is

¹ *Brookings, 2019; Urban Institute, 2018; Harvard Joint Studies for Housing Research, 2013; Center for Investigative Reporting, 2018*

from a very small base, and represents an approximate increase of less than 300 households), See **FIGURE 3-8**

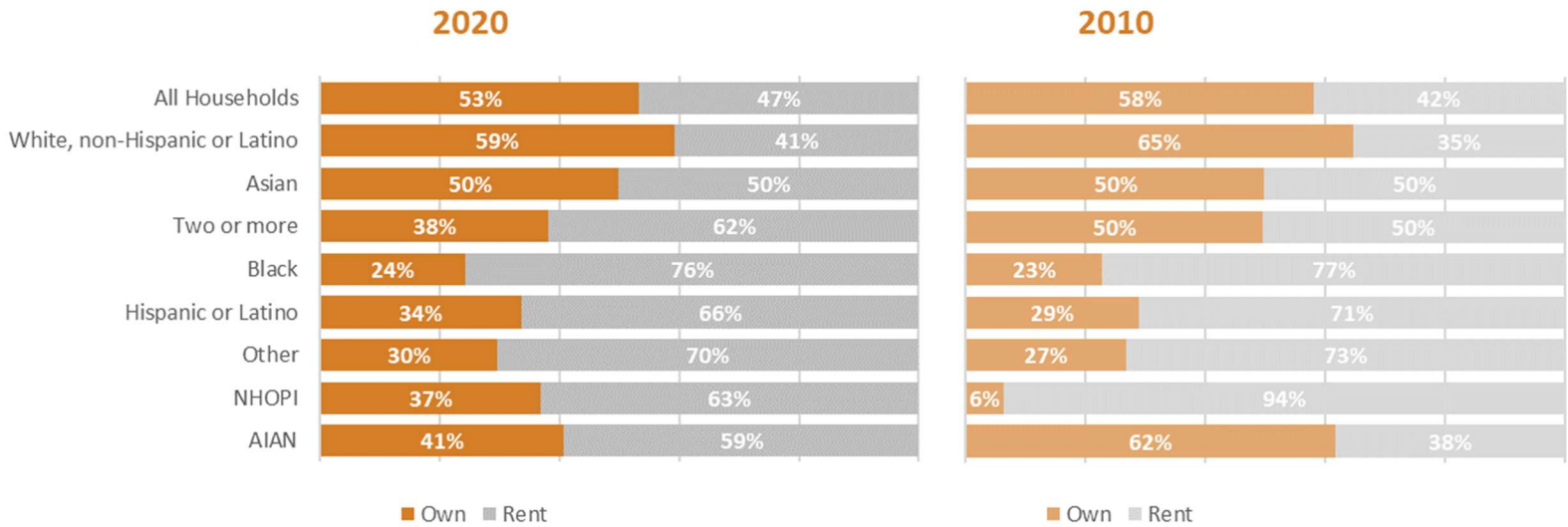


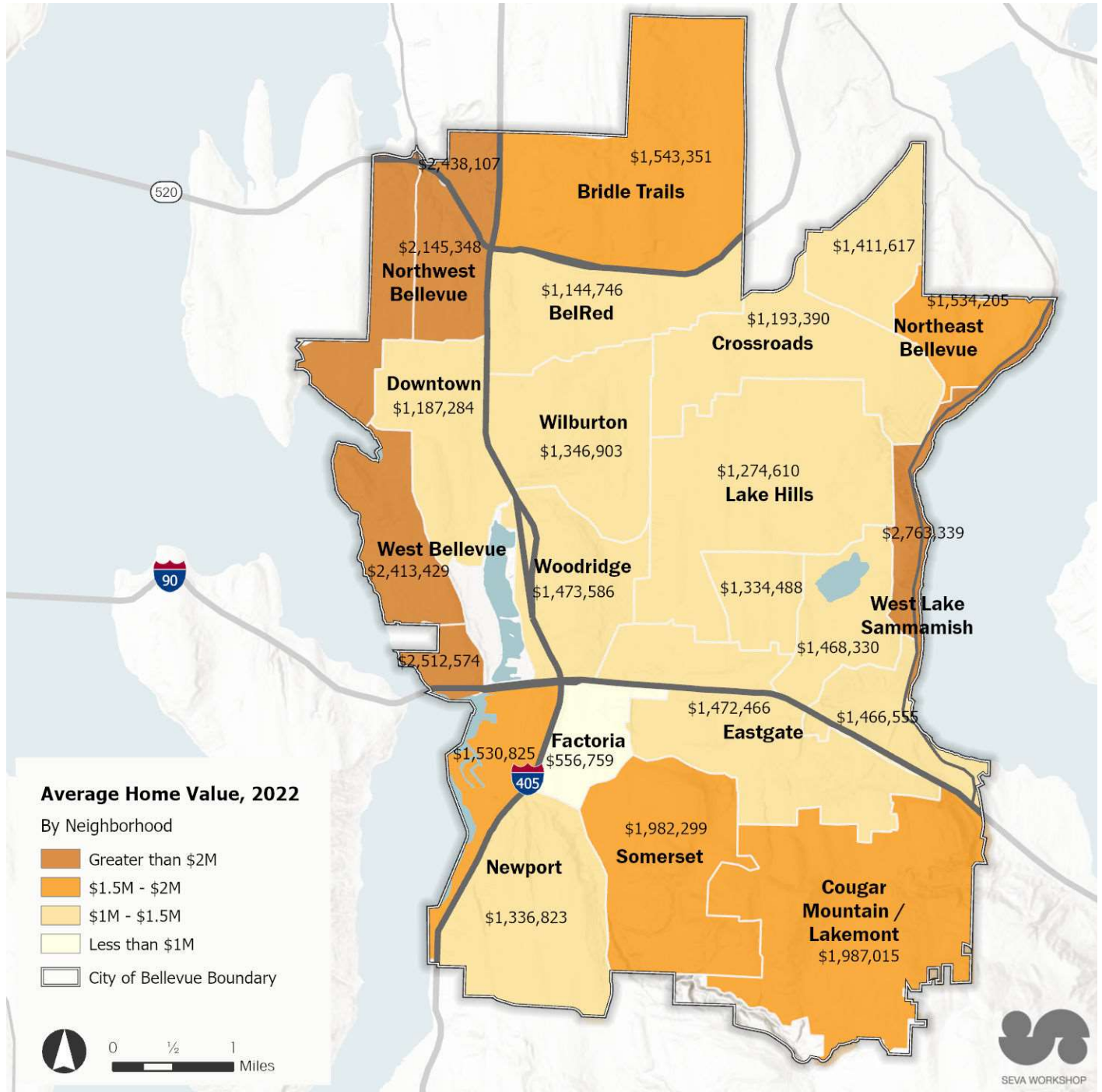
FIGURE 3-8 Homeownership Rates in Bellevue, by Race and Ethnicity, 2010 & 2020

SOURCES: American Community Survey 2020 5-year estimates, Table B25003A-I; Seva Workshop 2023.

NOTE: Margin of errors for smaller groups becomes high – for this disaggregation, NHOPI and AIAN categories, in particular, have very high margins of error. These estimates should be considered reflective of trends rather than exact calculations.

Historic and ongoing systemic barriers to homeownership are barriers to wealth since homeownership is one of the most common strategies for wealth building in the United States. Lack of affordable housing is one of the reasons behind disparities in homeownership rates. Relative to the region as a whole, Bellevue home prices and rent costs are higher and have increased faster. Median home prices in Bellevue are currently \$1.4 million compared to a countywide price of \$769K. (Source: Redfin market trends report, March 2023)

FIGURE 3-9 Home Values in Bellevue, 2022



SOURCES: Zillow, 2023; Seva Workshop, 2023.

Bellevue home prices have tripled in the last ten years; the median price in 2012 was \$491,600 and now it is about \$1.5 million. Rental costs have followed a similar pattern and Bellevue remains one of the costliest cities for renters in the region.

This decline in housing affordability hits households and families with lower incomes the hardest. Rising rents and a lack of affordable rental housing make it difficult for potential buyers to save for a downpayment on a home. Recent increases in loan interest rates put the cost of home ownership further out of reach for many. The impact of interest rate increases that happened between December of 2021 and April of 2022 were the equivalent of a 27% increase in home prices².

The rapid increases in home prices have however been a benefit for current homeowners while it continues to contribute to the wealth gap between homeowners and renters. Given the disparities in homeownership rates among White and Asian households and other communities of color, recent increases in home values exacerbate wealth disparities between white households and households of color.

National trends show that even households of color that own homes have far less housing wealth than white homeowners.³This trend holds true in Bellevue, where home values are unevenly distributed. Census tracts with larger proportions of Hispanic/Latino, Black, and Two or more races have lower typical home values than census tracts with smaller proportions of these communities. Many interlinked factors are behind these differences. This includes differences in the quality of the housing stock, such as the presence of older, smaller housing, as well as the amenities of the neighborhood. Lower home values further hamper the ability of homeowners to pay for improvements to the home. See **FIGURE 3-9**.

3.3.3 Housing Type

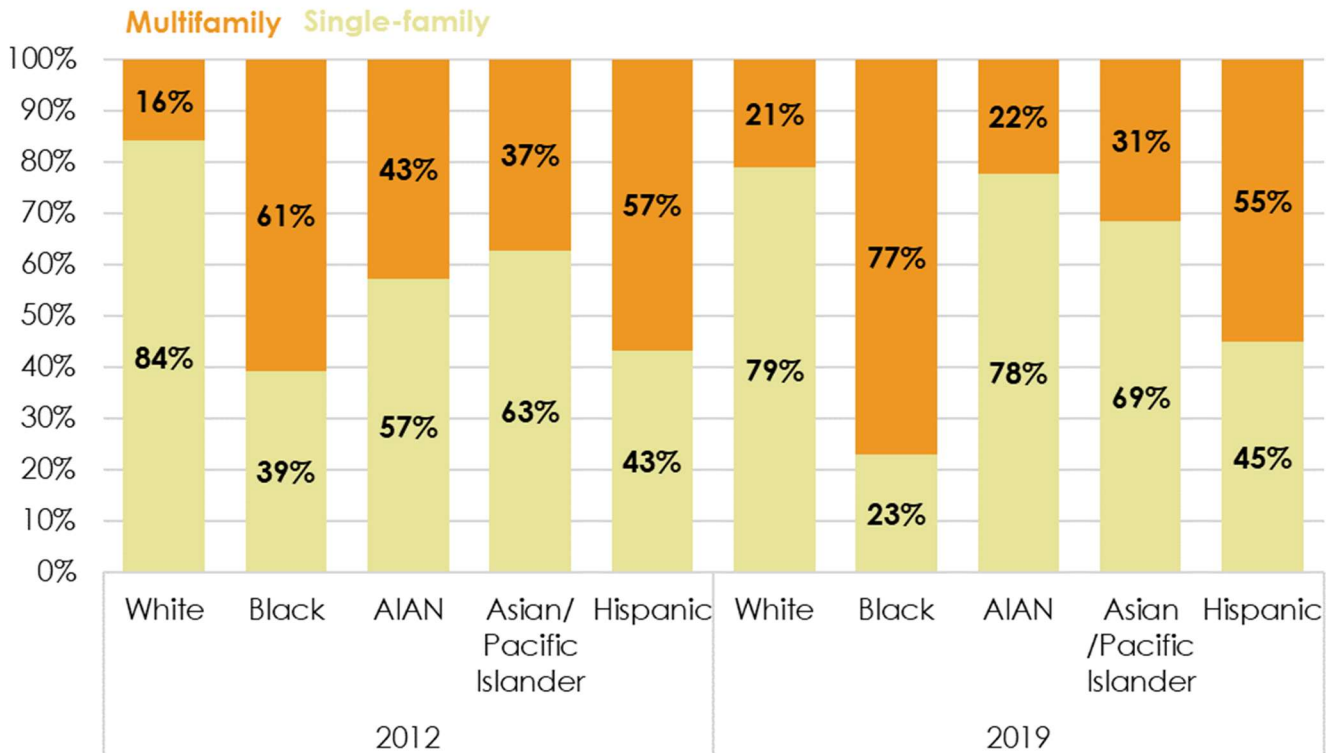
Housing is divided into two broad categories of structures: single-family and multifamily. Single family structures are typically detached, often with a yard, driveway, and garage. Multifamily structures include multiple units, often in taller buildings such as apartments, condos, town homes, row houses, etc. In Bellevue, most White and Asian/Pacific Islander residents live in single-family housing compared to only 23% of Black residents and 45% of Hispanic residents. See

FIGURE 3-10.

² Joint Center for Housing Studies, 2022

³ National data suggests that some of these disparities likely reflect lower home valuations in neighborhoods that are predominantly Black or Hispanic compared with neighborhoods that are predominantly white.³

FIGURE 3-10 Housing Type by Race, Bellevue PUMA, 2012 and 2019



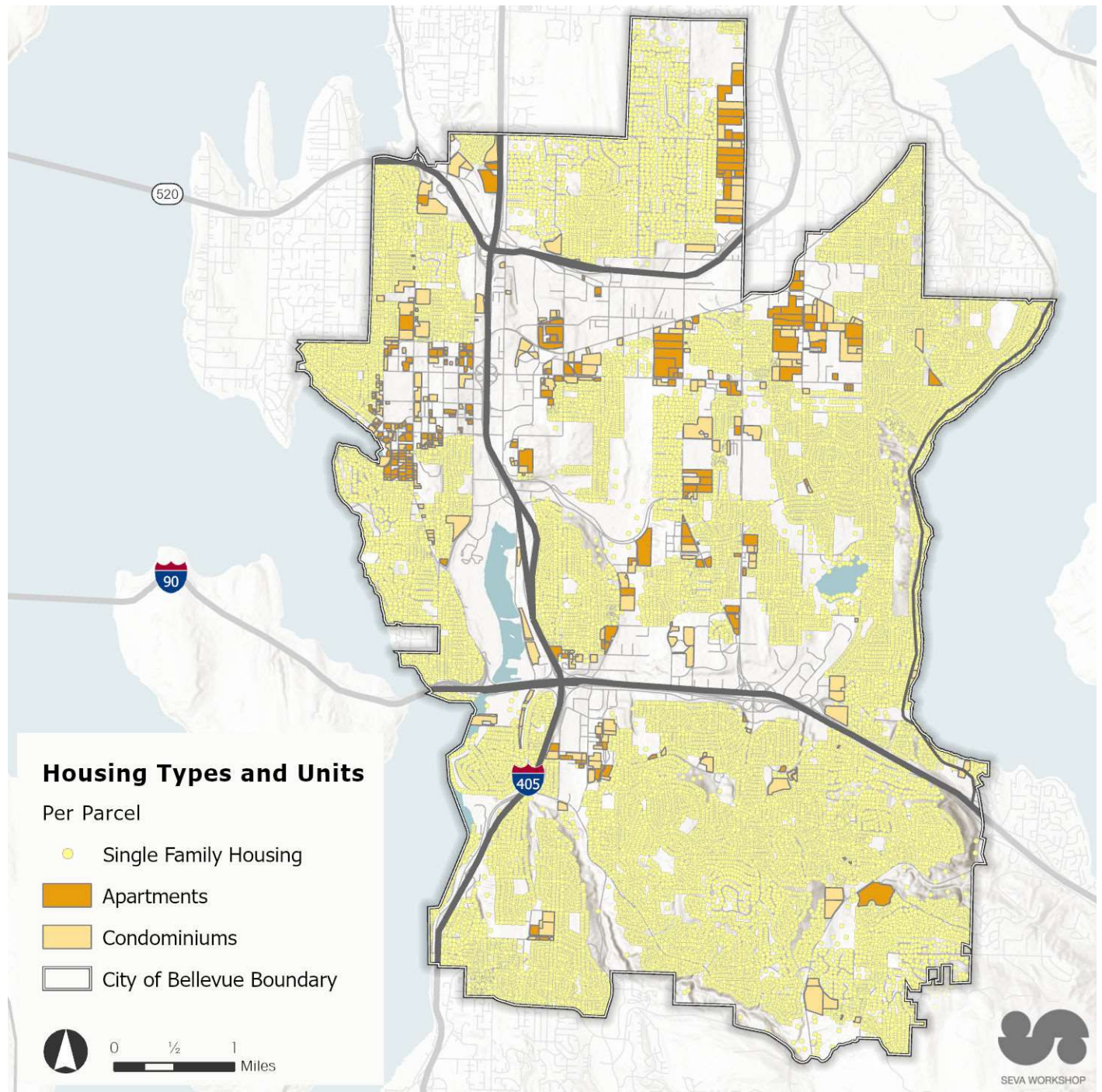
SOURCE: Public Use Microdata Sample (IPUMS), 2012-2020; CAI, 2022.

NOTE: The Bellevue Public Use Microdata (PUMA) includes the City of Bellevue, in addition to the surrounding communities of Clyde Hill, Hunts Point, Yarrow Point, Medina, and Beaux Arts Village. The latest data available that provides a breakdown of race and ethnicity by housing type is from 2019. AIAN stands for American Indian or Alaska Native.

FIGURE 3-11 shows the distribution of housing unit types across the City of Bellevue. Single-family and multifamily housing is not evenly distributed across the city. Multifamily structures are concentrated around the downtown area, west of I-405, with other clusters in the Bridle Trails and Crossroads neighborhoods. The remainder of multi-family units are dispersed throughout Bellevue’s central neighborhoods, particularly in Wilburton and in the area surrounding Bellevue College.

These data show the lack of choice in housing type across the city. Lack of access to diverse housing types at different price points restricts geographic choice for many communities of interest, forcing them into a few neighborhoods in the city. It can also force some communities, such as older adults who want to downsize, to move out of their neighborhoods to access other housing types. More diversity in housing type within neighborhoods would open up more of the city to all communities and allow households to age and change without needing to leave their neighborhoods.

FIGURE 3-11 Housing Types and Units per Parcel, Bellevue, 2020



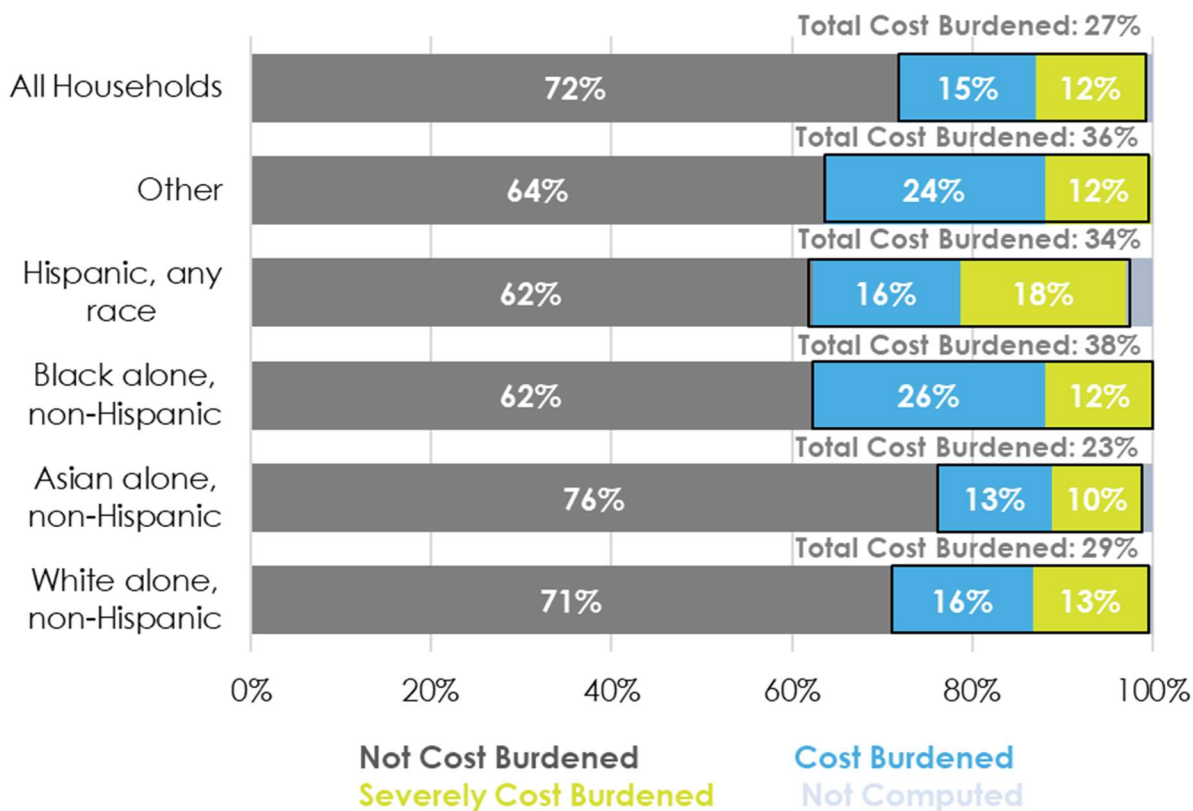
SOURCE: King County Department of Assessments, 2022; CAI, 2022; Seva Workshop, 2023.

3.3.4 Cost Burden

HUD defines a household as cost burdened if they spend between 30% and 50% of their gross household income on housing, and severely cost burdened if they spend more than 50% of their gross household income on housing. Cost-burdened households may cut back on other necessities such as food, healthcare, and education, to make ends meet. They will be at higher risk of displacement when rents rise or other life circumstance changes. The effects of cost burden will be most dramatic for households with lower incomes, where there simply is not enough money to meet basic family needs after housing costs.

Rates of housing cost burden, by race and ethnicity: White and Asian households are the least cost burdened in Bellevue. Black households are the most cost burdened (38%), with Hispanic households close behind (34%). Hispanic households are the most likely to be severely cost burdened. See **FIGURE 3-12**

FIGURE 3-12 Cost Burdened Status by Householder Race, Bellevue, 2019



SOURCES: HUD Comprehensive Housing Affordability Strategy (CHAS), 2015-2019; Community Attributes Inc., 2022.

Rates of housing cost burden for older adults: More than half (51%) of older adults living alone are cost burdened and more than 1 in 4 (28%) are severely cost burdened (spend more than 50% of monthly income on housing).

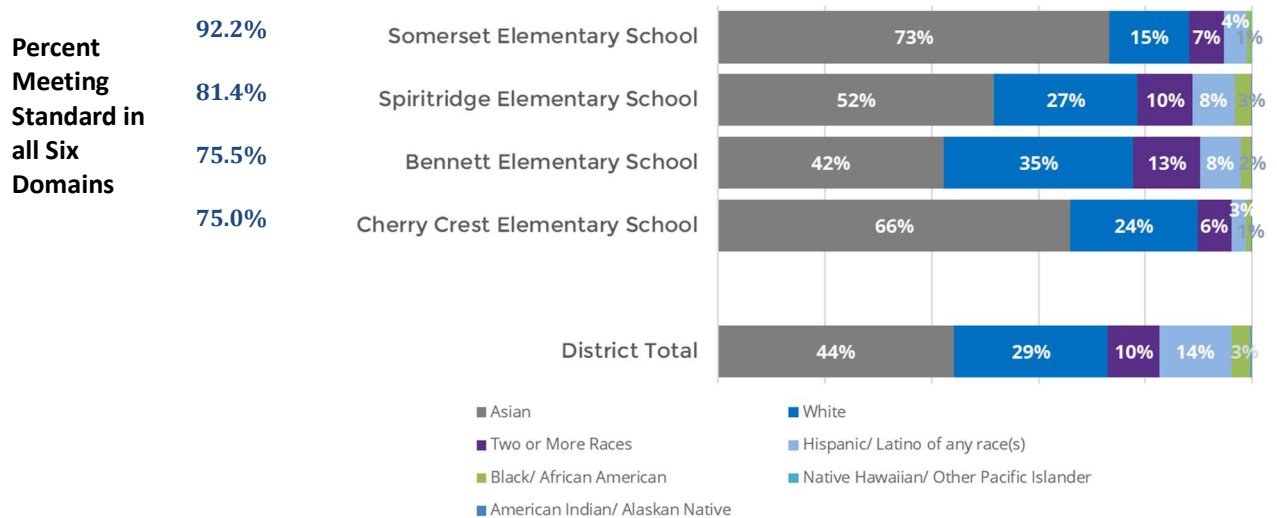
Rates of housing cost burden by income level: Cost burden is not evenly distributed. Households with lower incomes are more likely to be cost-burdened. Only 9% of those earning more than 100% AMI are cost burdened while a third of those at or below 100% AMI are cost burdened. A full 74% of low and very-low income households qualify as cost burdened, with nearly two-thirds of all very low-income households being severely cost burdened.

Disparities in housing outcomes drive disparate impacts in many other facets of life. Access to education, parks, and environmental risk exposure are all driven in large part by where one lives. Examining these downstream effects of housing location and choice can help identify policies that may cause a racially disparate impact.

3.3.5 Disparities in Education Access or Benefits

The Washington State Office of the Superintendent of Instruction uses an observational whole child assessment to document kindergarten readiness. Six areas of development are assessed: social-emotional, physical, cognitive, language, literacy, and mathematics. **FIGURE 3-13** shows the racial composition of the elementary schools with the highest rates of kindergarten readiness, as measured by the proportion of students observed to be at standard in all six domains. As these assessments are performed early in the school year, they largely reflect a student’s experiences and learning *before* entering public school (rather than school performance per se). District-wide demographics provide a reference point. Students in the top performing schools are more likely to be Asian compared to the district overall. Hispanic students are underrepresented in the top performing schools.

FIGURE 3-13 Demographics of Top Four Kindergarten Ready Elementary Schools, 2021-22



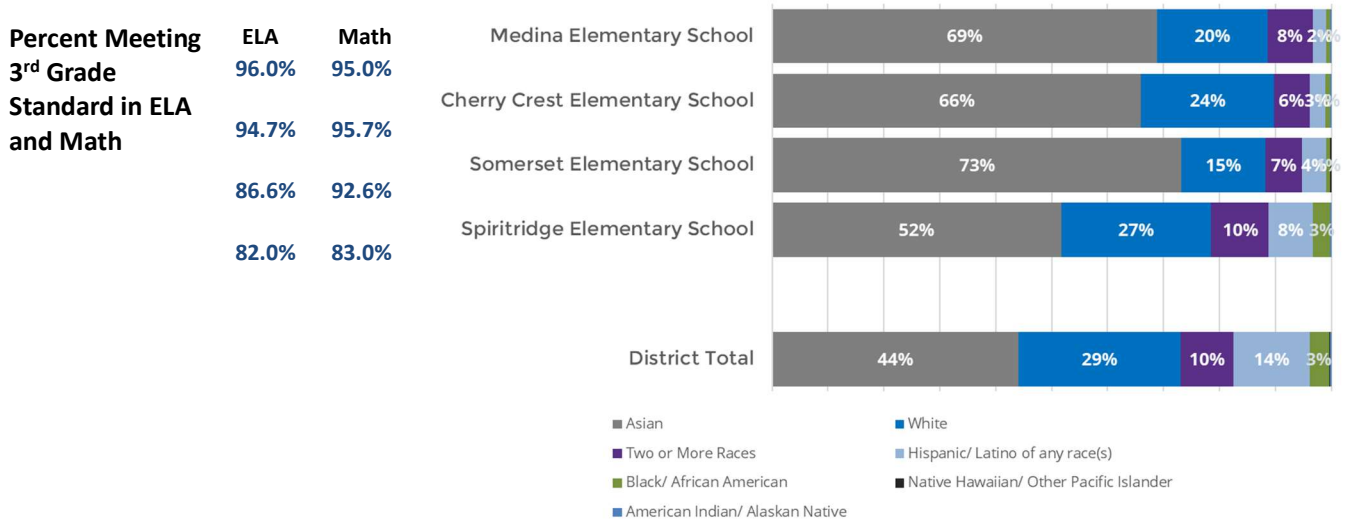
SOURCE: OSPI, 2023; Seva Workshop, 2023.

NOTE: Alternative and choice schools were excluded from this analysis.

These demographic trends are slightly more pronounced by third grade as shown by proportions of students meeting standard in English Language Arts and Math in **FIGURE 3-14**. These assessments are

likely to reflect the experiences and resources available to students in the school environment as well as in homes and neighborhoods.

FIGURE 3-14 Demographics of Top Elementary Schools by 3rd Grade Assessment, 2021-22

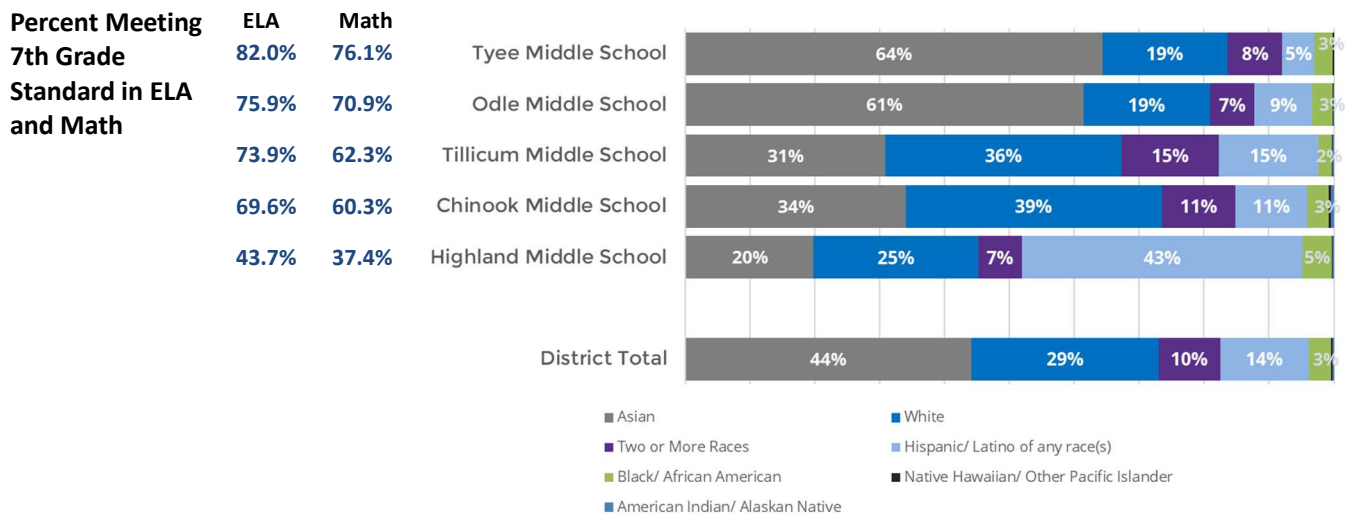


SOURCE: OSPI, 2023; Seva Workshop, 2023.

NOTE: Alternative and choice schools were excluded from this analysis.

FIGURE 3-15 illustrates that the school district’s Hispanic/Latino population is concentrated in one middle school, Highland Middle School, serving northeast Bellevue and the diverse Crossroads area. Asian students have the greatest proportional access to top performing schools by 7th grade ELA and math standards.

FIGURE 3-15 Demographics of Middle Schools by 7th Grade Assessment, 2021-22

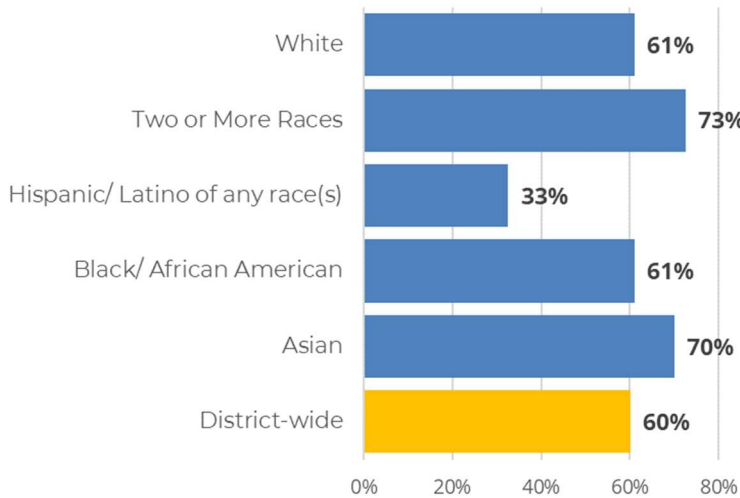


SOURCE: OSPI, 2023; Seva Workshop, 2023.

NOTE: alternative and choice schools were excluded from this analysis.

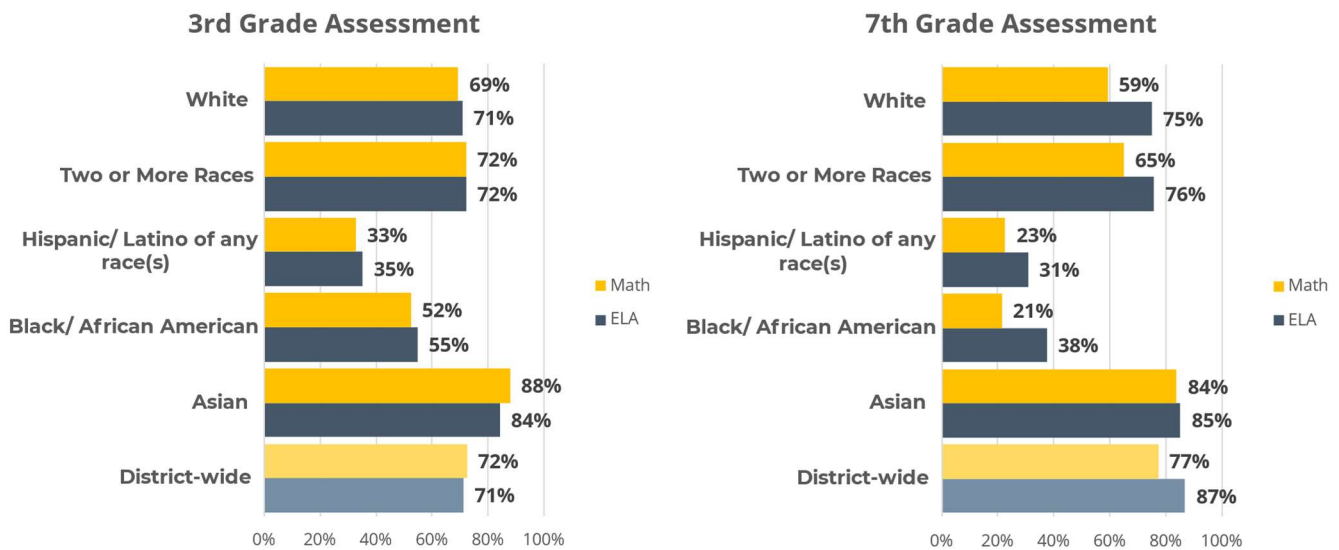
Across school boundaries, young Hispanic/Latino students in the Bellevue School District lack access to the resources and supports necessary to meet kindergarten readiness standards. One third of Hispanic/Latino students enter kindergarten ready compared to a district average of 60%.

FIGURE 3-16 Demographics of Students Meeting all Six Domains of Kindergarten Readiness, 2021-22



SOURCE: OSPI, 2023; Seva Workshop, 2023.

FIGURE 3-17 Demographics of Students Meeting Standard by 3rd and 7th Grade Assessment, 2021-22

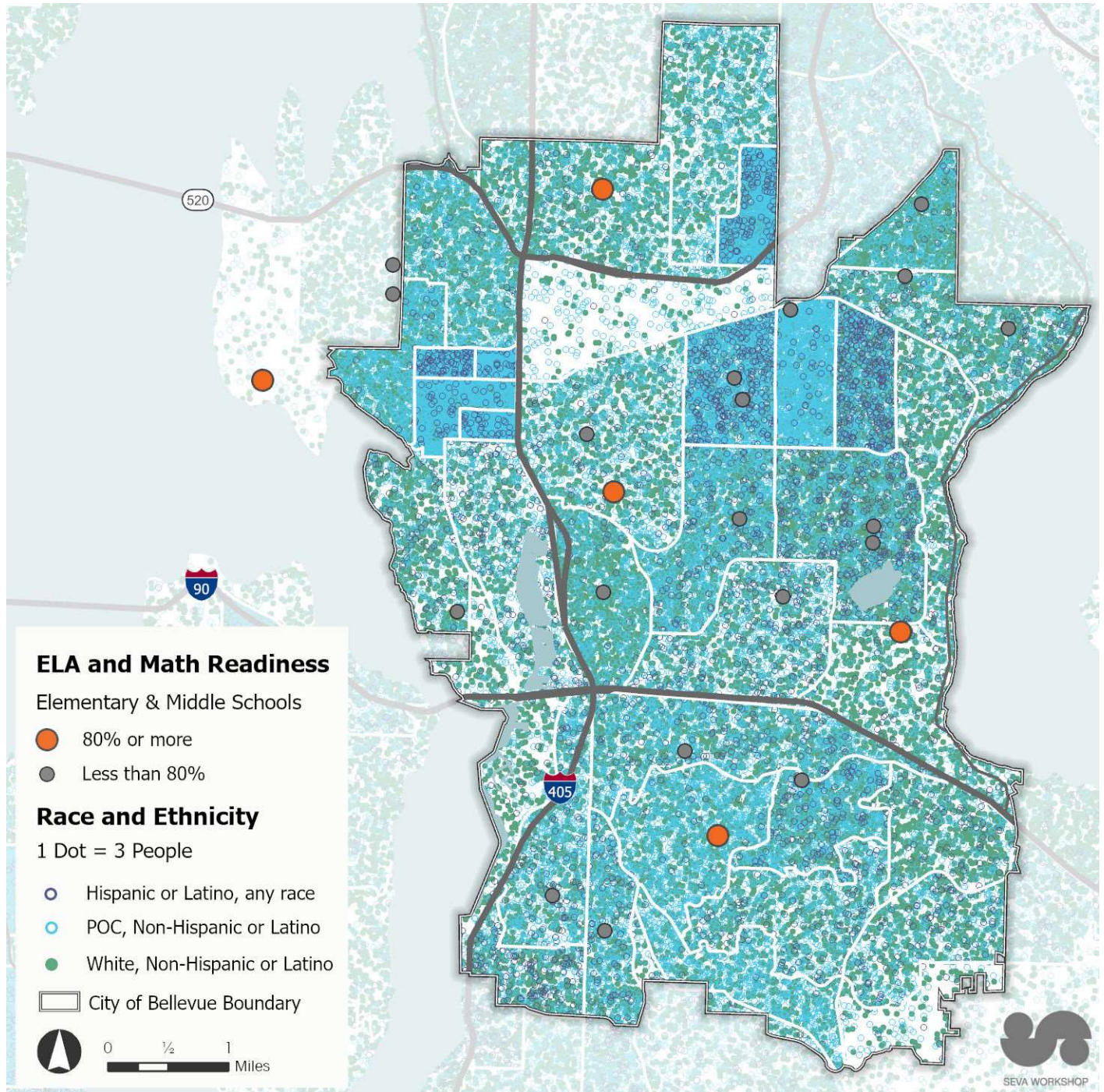


SOURCE: OSPI, 2023; Seva Workshop, 2023.

Disparities in achieving grade-level standards are seen for Black/African American students and Hispanic/Latino students at 3rd and 7th grade. For Black/African American students, this concerning disparity appears in 3rd grade despite entering kindergarten at rates of readiness exceeding the district average. Data for Native American Indian/ Alaskan Native (33) and Native Hawaiian/ Other Pacific Islander

(50) was suppressed due to their small numbers of enrollment in the district. Geographically, Black and Hispanic students are excluded from some of Bellevue’s highest performing schools by virtue of where they live, as shown in **FIGURE 3-18**.

FIGURE 3-18 Location of Higher Performing Schools Relative to Racial Composition of Neighborhood

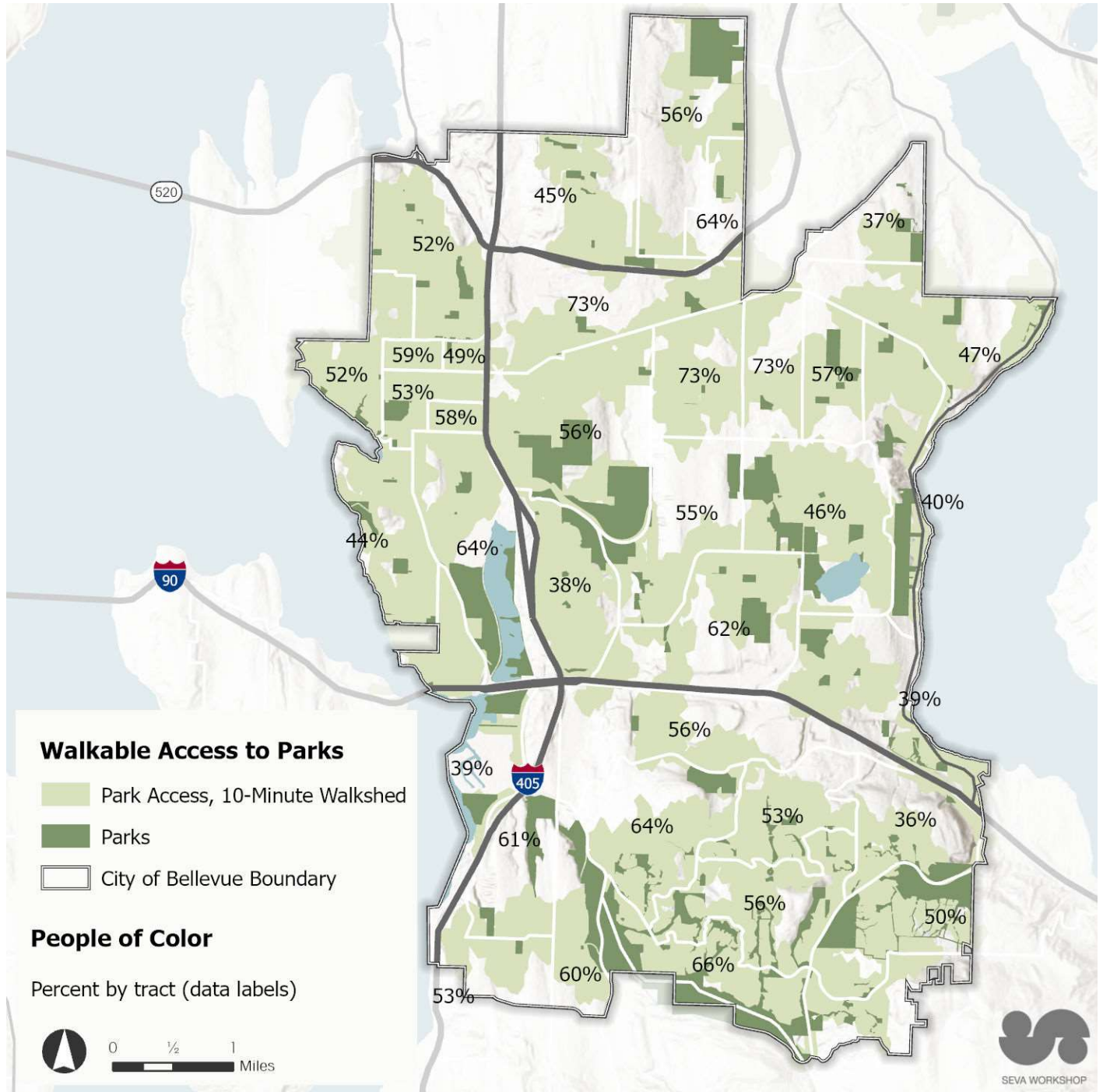


SOURCE: OSPI, 2023; Seva Workshop, 2023.

3.3.6 Access to Parks

FIGURE 3-19 shows the areas of the city that are within a 10-minute walk of a park. Areas of the city in the north as well as areas in Crossroads, Eastgate and Factoria have gaps in access to parks (note the gaps in white on the map). Some of these areas, especially Crossroads, Eastgate, and Factoria have larger proportions of communities of color and higher population density.

FIGURE 3-19 Walkable Access to Parks and Percent POC, 2023



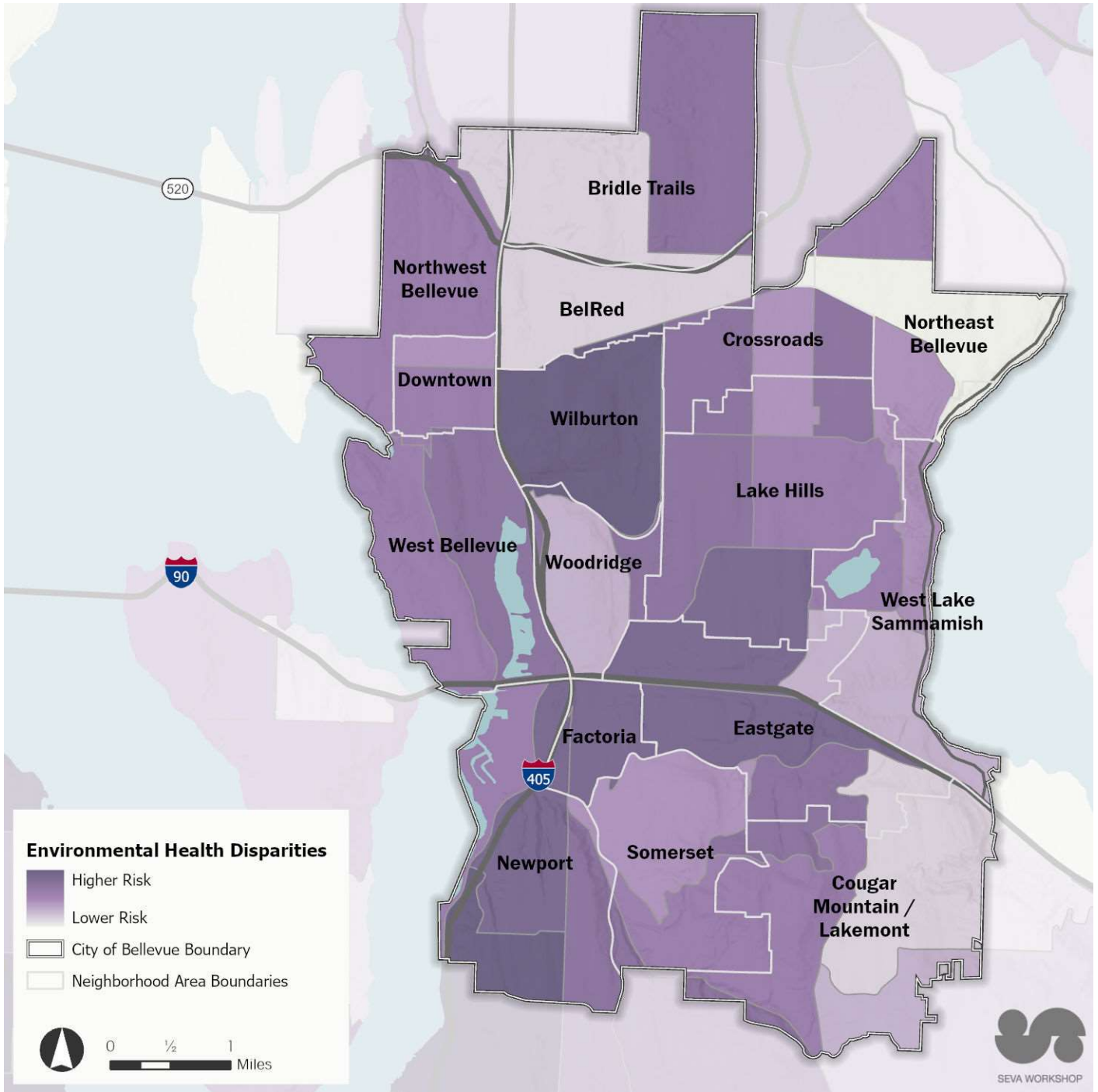
SOURCES: City of Bellevue, 2022; Seva Workshop, 2023.

3.3.7 Exposure to Environmental Health Risk

The Washington Environmental Health Disparities Map shows where people experience the greatest environmental health risk factors. It estimates a cumulative environmental health risk ranking for each census tract. Environmental risk is understood as a combination of exposure to a threat (environmental hazards) and a population's vulnerability to that threat, which stems from their sensitivities to that threat and their ability to avoid or mitigate it which is related to socioeconomic factors. The risk map reflects several data points related to threats and risks by census tract, including pollutant exposures, proximity to potential environmental hazards such as lead, toxins from facilities, and proximity to Superfund areas; socioeconomic status, presence of sensitive populations, and other indicators of community health.

The map shows that residents of Wilburton, Factoria, and Eastgate neighborhoods are more likely to live in areas with high environmental health risks. Other areas of Bellevue, particularly to the north and east, and Woodridge experience much lower environmental health risks. See **FIGURE 3-20**

FIGURE 3-20 Environmental Health Risk, 2023



SOURCES: Washington State Department of Health (DOH), 2021; Seva Workshop, 2023.

3.3.8 Fair Housing Choice

The Fair Housing Act of 1968 protects people seeking homes from discrimination based on race, color, national origin, religion, sex, familial status, and disability. The Fair Housing Act requires that recipients of federal housing and urban development funds take meaningful action to address housing disparities, including undoing segregated living patterns, transform racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

In 2019, King County Consortium conducted an analysis of impediments to fair housing choice⁴ that meets the requirements of HUD's Assessment of Fair Housing rules (AFH).⁵ The analysis identified contributing factors to fair housing issues or impediments. **TABLE 3-3** presents the study's findings for factors that contributed to the identified fair housing issues. The issues are prioritized according to their impact on fair housing choice.

TABLE 3-3. Community Input on Housing Issues, 2019

Feedback	Detailed Comments
ONLINE SURVEY	
Rental Market	<p>The rental market is challenging for many.</p> <ul style="list-style-type: none"> • 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. <p>Living with multiple roommates in crowded conditions to afford areas where they want to live.</p> <p>Community members settling for sub-quality rental housing in order to manage affordability</p>
Homeownership	<p>Housing ownership market is too expensive and unattainable:</p> <ul style="list-style-type: none"> • 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

⁴ The King County Consortium includes all of King County with the exception of the cities of Seattle and Milton. The Report is available on King County's website: <https://kingcounty.gov/~media/depts/community-human-services/housing-homelessness-community-development/2020-24-ConPlan/2019KC-Analysis-Impmts-2FairHousing-fin.ashx?la=en>.

⁵ <https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing>

Feedback	Detailed Comments
PUBLIC MEETINGS AND INTERVIEWS	
Fair Housing Enforcement	<p>Fair Housing enforcement needs improvements, as the current system relies on the injured party to report discrimination (racism, classism, ableism etc.).</p> <p>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</p>
Barriers	<p>Certain protected classes (i.e. individuals living with a disability, immigrants with limited English proficiency) experience inherent barriers to accessing housing:</p> <ul style="list-style-type: none"> o Need more accessible units for people with disabilities and policies to ensure units are actually accessible or modified to be accessible. o Need more translated materials (forms, websites) and interpreters to help immigrants/refugees access information and apply for housing.
Displacement	<p>The impacts of displacement are being felt across the County:</p> <ul style="list-style-type: none"> o Available housing is pricing out low-income individuals. o Evictions are disproportionately impacting women of color. o Cost of housing is restricting geographical choice, and forces residents to relocate. o Number of people experiencing homelessness continue to increase
Experience of subgroups	<p>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.</p>

SOURCES: Reproduced from summary of community input, 2019 Analysis of Impediments to Fair Housing Choice, King County Consortium.

In addition to this input, the report included the result of testing by the Fair Housing Center of Washington. As of May 31, 2019, the Fair Housing Center of Washington completed eighty-two (82) tests, of which thirty-nine (39) or slightly less than half, 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.

A differential treatment test is when two individuals pose as prospective renters or purchaser, without intent to rent or purchase a home, apartment, or other dwelling. One individual is a member of a protected class and one is not . They ask questions to determine whether a housing provider is complying with fair housing laws. A “positive” test indicates that they found evidence of discrimination. Twelve differential treatment tests were conducted in Bellevue: six for race, two each for disability and religion, and one each for national origin and familial status. Evidence of discrimination was found in six of the tests: in three of the race tests, in one each of the disability and religion tests, and in the national origin test. One policy check for source of income was conducted in Bellevue, which did find evidence of discrimination. Slightly more than half of all tests conducted in Bellevue detected discrimination, slightly higher than the countywide result.

3.4 Exclusion

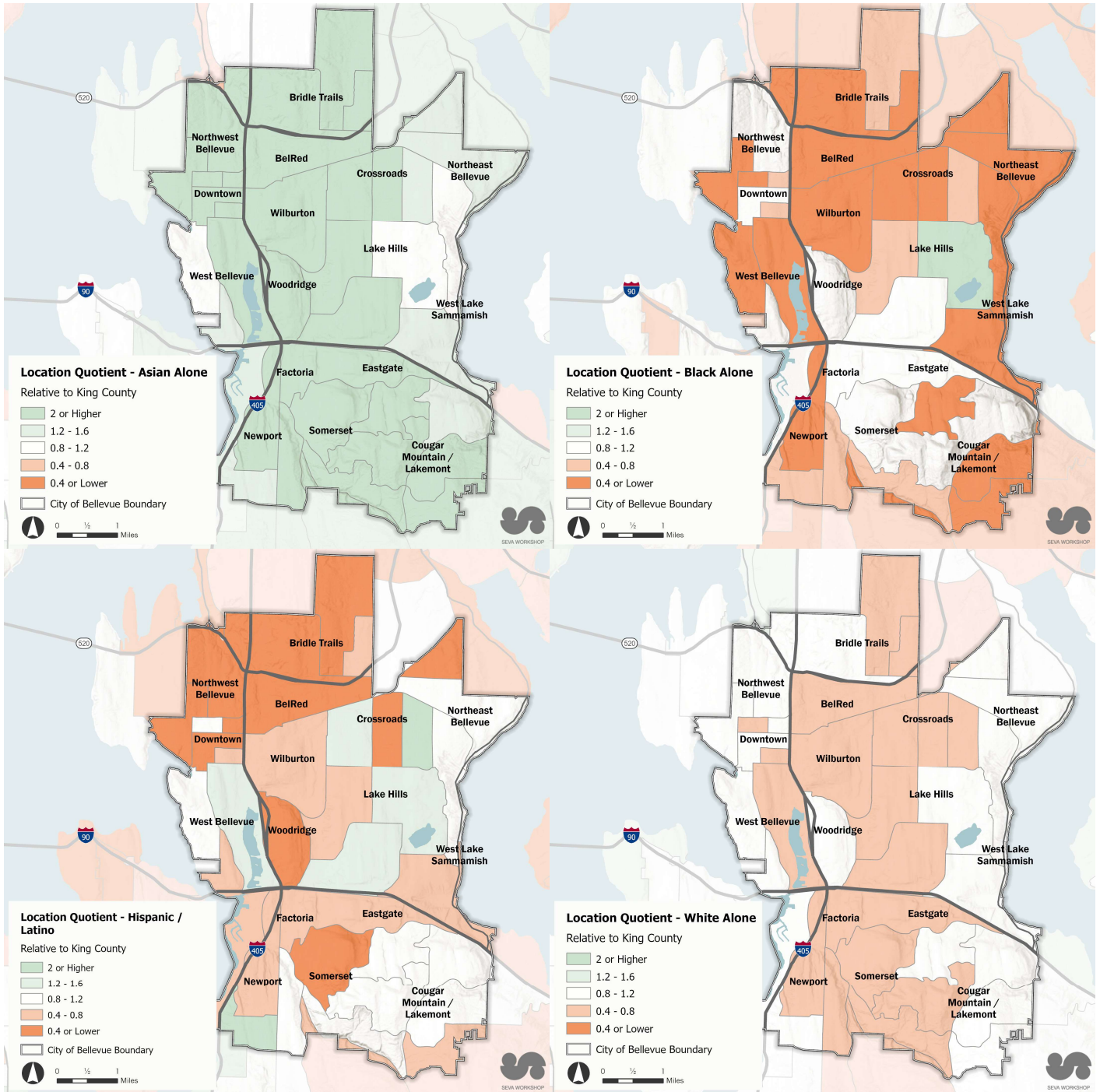
Exclusion refers to the act or effect of shutting or keeping certain populations out of housing within a specified area, in a manner that may be intentional or unintentional, but which nevertheless leads to non-inclusive impacts. One indicator of exclusion is segregation by race or ethnicity. A history of exclusionary practices was provided in Section 4 **Error! Reference source not found..** Here, we examine a series of indicators to determine whether those practices have had exclusionary effects.

3.4.1 Over or Under Representation of a Subgroup

One way to assess segregation is location quotient. This metric can be calculated at the census tract scale and mapped to show the concentration of communities of interest in each census tract relative to county as a whole. For example, if 7% of the neighborhood population is Black, and 7% of the county population is Black, then the location quotient is 1. A tract where 14% of residents are Black would have a location quotient of 2. And a track where only 3.5% of residents are Black would have a location quotient of 0.5. So, tracts with high location quotient scores have a greater share of that population compared to the rest of the County.

FIGURE 3-21 maps location quotients for Asian, Black, Hispanic/Latino and White residents. It shows census tracts in white or light and dark orange where residents of each race/ethnicity are under-represented. Asian residents are significantly overrepresented in Bellevue compared to King County as a whole. In Lake Hills, Northeast Bellevue and part of West Bellevue, the Asian population is present at proportions similar to the County overall. Black residents are underrepresented in Bellevue compared to King County as a whole, though overrepresented in Lake Hills. Hispanic residents are underrepresented in many neighborhoods in Bellevue compared to King County as a whole, though slightly overrepresented in portions of Eastgate, Lake Hills, Crossroads, West Bellevue, and Newport. White residents are underrepresented in many neighborhoods in Bellevue compared to King County as a whole.

FIGURE 3-21 Location Quotients for Asian, Black, Hispanic/Latino and White Residents



SOURCE: US Census ACS 2017-2021 5-year estimates; Seva Workshop, 2023.

3.4.2 Workforce Housing

Around 89% of people employed in Bellevue live outside the city. Residents who live and work in the city are concentrated in Downtown, parts of the Crossroads neighborhood and the eastern edge of Bridle Trails. See **FIGURE 3-22** The large proportion of workers who live outside the city could indicate the city does not have enough housing to accommodate its workforce or enough housing matching the needs and affordability levels of those wanting to live in Bellevue. The five largest occupational categories in Bellevue (making up 53% of the city's total jobs) are:

- Computer and mathematical
- Business and financial operations
- Office and administrative support
- Sales and related
- Food preparation and serving related

Median annual wages in these five categories range between \$37,000 and \$130,000. Of these five occupational categories, computer and mathematical occupations have the highest median wage and mostly include information and technical services occupations, such as software developers, web developers, computer system analysts, and others. It's not just these top five professions. Nearly 1 in 4 Bellevue residents and almost a third of employees make less than \$3,333 per month or \$40,000 or less annually. See **TABLE 3-4**

TABLE 3-4 Income Estimates for Residents and Employees, Bellevue, 2019

Income Estimate	Residents	Employees
Less than \$1,250 per month	5,997 (9.4%)	13,915 (9.3%)
\$1,251 to \$3,333 per month	10,145 (15.9%)	28,510 (19.1%)
More than \$3,333 per month	47,843 (74.8%)	106,926 (71.6%)

SOURCE: U.S. Census OnTheMap, 2019; CAI, 2022.

In September 2022, the Seattle Times reported that median monthly rent for a Bellevue apartment was \$2,351, which is unaffordable for four of Bellevue's five largest occupational categories. See **TABLE 3-5**

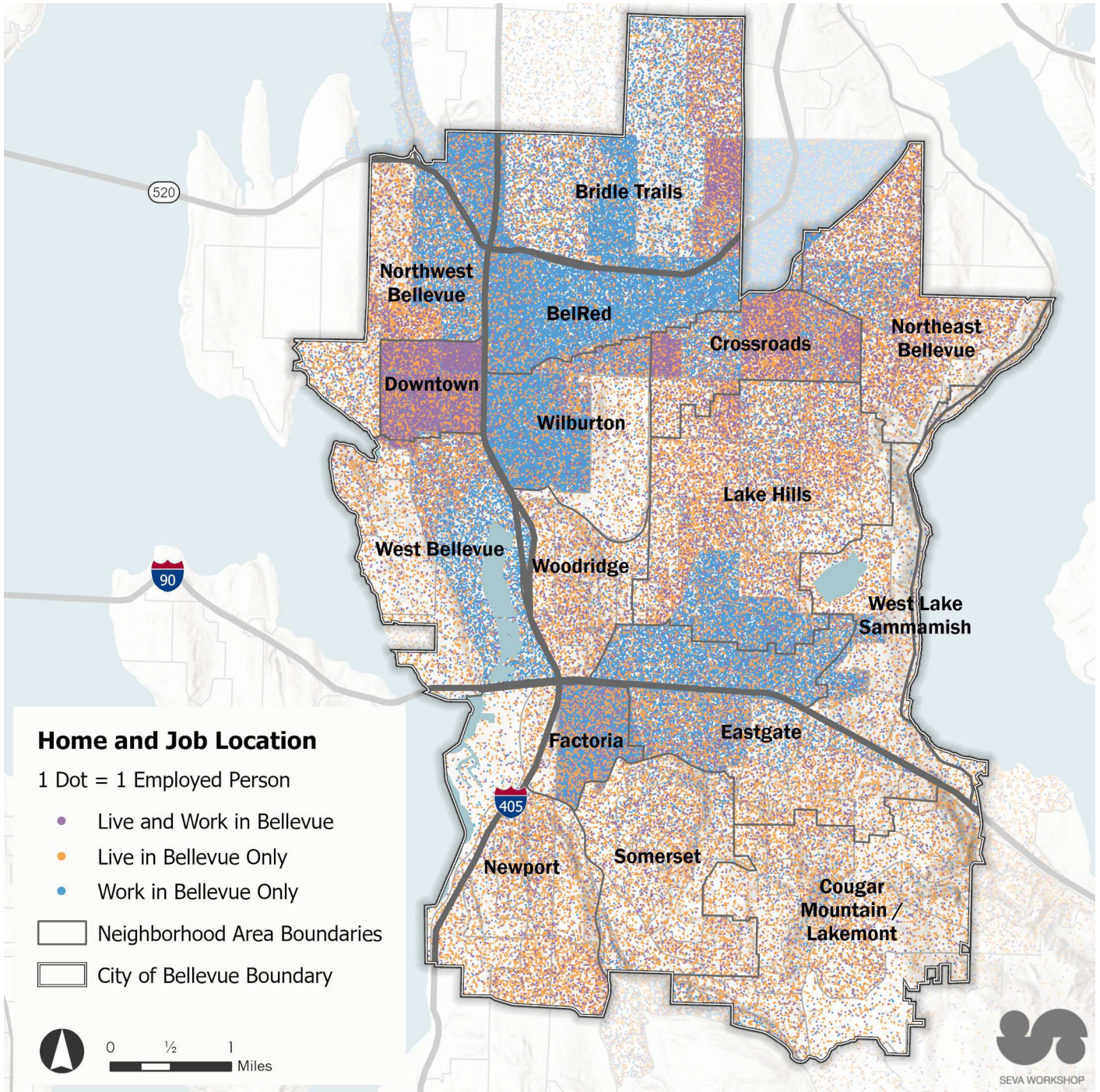
TABLE 3-5 Median Annual Wage and Maximum Affordable Monthly Housing Cost in the Largest Occupations in Bellevue, 2021

	% of 2020 Bellevue Employment	Median Annual Wage, 2021	Maximum Affordable Monthly Housing Cost
Computer and Mathematical	14%	\$130,410	\$3,260
Business and Financial Operations	11%	\$83,810	\$2,095
Office and Administrative Support	11%	\$47,820	\$1,196
Sales and Related	9%	\$44,140	\$1,104
Food Preparation and Serving Related	7%	\$36,680	\$917

SOURCE: PSRC, 2020; BLS OES, May 2021; CAI, 2022.

NOTE: Median wage is for the Seattle-Tacoma-Bellevue MSA.

FIGURE 3-22 Job Inflow/Outflow Locations in Bellevue, 2019 (All Primary Jobs)



SOURCES: Longitudinal Employer-Household Dynamics, Origin-Destination Employment Statistics, 2019; Seva Workshop, 2023.

TABLE 3-6 Job Inflow/Outflow Demographic Characteristics in Bellevue, 2019 (All Primary Jobs)

	Total Workers	Age of Workers			Monthly Income of Workers		
		29 or Younger	30 to 54	55 and Older	\$1,250 or less	\$1,251 - \$3,333	\$3,334 or more
Live in Bellevue	63,985	22.1%	58.0%	19.9%	9.0%	15.1%	76.0%
Work in Bellevue	149,351	22.1%	59.7%	18.2%	9.2%	19.2%	71.6%
Live & work in Bellevue	16,759	23.4%	57.8%	18.8%	10.5%	18.1%	71.4%

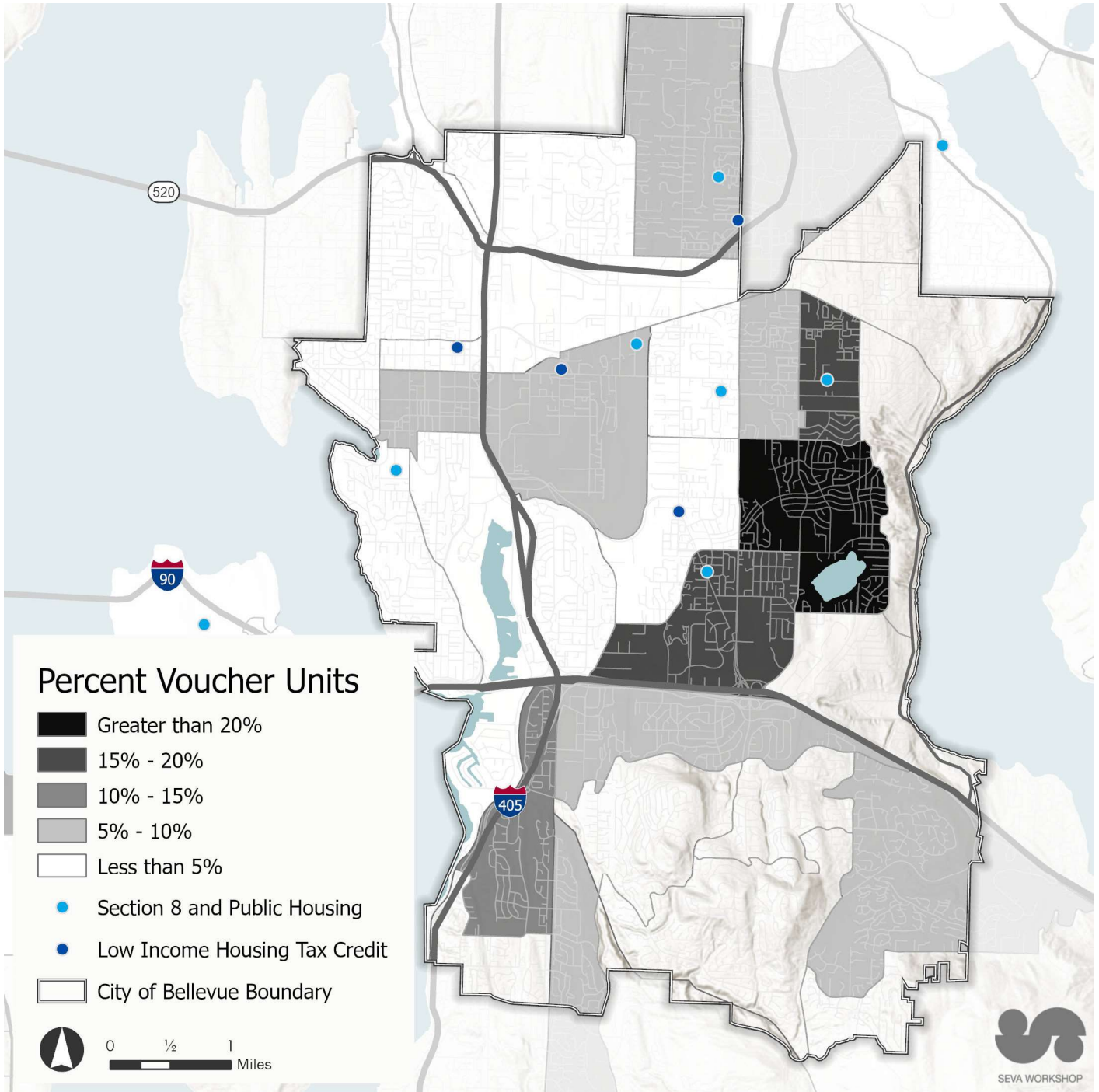
SOURCES: Longitudinal Employer-Household Dynamics, Origin-Destination Employment Statistics, 2019; Seva Workshop 2023.

3.4.3 Affordable and Subsidized Housing

One of the City's housing goals is to prioritize affordable housing to very low income households. Tools such as subsidized housing and Housing Choice Vouchers are important to achieving this goal. However, in many cities, affordable and subsidized housing tends to be concentrated in neighborhoods with lower quality of life, such as poorer quality housing stock and more limited access to parks and high performing schools, a form of exclusion.

FIGURE 3-23 shows the geographical distribution of subsidized housing and voucher use within the city. While public housing and locations that have used the Low Income Housing Tax Credit are scattered throughout the central neighborhoods of the city, voucher use is predominantly in Eastgate, West Lake Sammamish and Crossroads neighborhoods.

FIGURE 3-23 Voucher Use in Bellevue, 2020



SOURCES: Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool; Seva Workshop, 2023.

3.5 Displacement

Displacement refers to instances when a household is forced or pressured to move from their home against their will. Measures such as the eviction rate, number and location of foreclosures, and counts of individuals experiencing homelessness can show instances where displacement has already happened. Analysis of expiring affordable housing covenants and the relative risk of displacement can show areas of the city where households are most vulnerable to displacement. Displacement and future risk of displacement is hard to measure and predict. Engagement with communities is an important way to verify these datapoints and focus city efforts.

3.5.1 Housing Insecurity: Patterns of Evictions

Monitoring the count and rate of evictions can show where displacement has happened. Available datasets, however, only capture court-filed evictions and will not include residents who are priced out of units or who are asked to vacate a unit outside of the court system. Data on evictions also have a time lag. National trends indicate that eviction filings have increased recently, as government protections and emergency assistance related to the pandemic have now ended or run out. Despite these limitations, data can highlight areas of the city where evictions are at a high rate relative to the number of rental households.

Eviction rates evaluate the number of evictions against the total number of renters within a given Census tract and then compare this rate to all other Census tracts within the county to identify locations which stand out in the region for high eviction rates. The blocks along NE 10th in Downtown Bellevue between 100th Ave NE and east until the freeway, the Crossroads neighborhood, and the areas south of I-90 in Eastgate have an eviction rate of 1.17%⁶ which is higher than the rate in other parts of the city.

3.5.2 Homelessness

Homelessness has been characterized as a crisis in King County for the last decade. Nearly 13,370 individuals were estimated to be homeless in the County in 2022.

Compared to the overall population of Seattle/King County, homelessness disproportionately impacts people of color. Countywide, the largest disparities were observed among those identifying as Black or African American and American Indian/Alaska Natives. See [TABLE 3-7](#)

TABLE 3-7. Individuals experiencing homelessness, King County, 2022

	% of population	% of individuals experiencing homelessness
Black/African American/African	7%	25%
American Indian/Alaskan Native/Indigenous	1%	9%
Asian/Asian American	20%	2%
Hispanic/Latin(a)(o)(x)	10%	17%

⁶ Based on the UW Evictions Study. The eviction rate is the rate of eviction filings per 100 renting households according to 2013-2017 American Community Survey (ACS) 5-year estimates.

	% of population	% of individuals experiencing homelessness
Multiple Race	6%	13%
Native Hawaiian/Pacific Islander	1%	4%
White	65%	48%

SOURCE: King County, "2022 POINT IN TIME COUNT," <https://kcrha.org/wp-content/uploads/2022/06/PIT-2022-Infograph-v7.pdf>, 2023

More youth are becoming vulnerable to homelessness. According to data from the Washington State Office of the Superintendent of Public Instruction (OSPI), 1% of students enrolled in the Bellevue School District qualify as experiencing homelessness. While the percentage has remained relatively steady since 2014, that 1% represented 700 students in the 2014-15 school year but nearly 1,200 in the 2019-20 school year. Per federal Department of Education definitions, youth homelessness in schools includes students living in doubled-up and substandard housing, unlike the Housing and Urban Development definition used for the countywide counts.

3.5.3 Subsidized Affordable Housing

According to the City of Bellevue’s inventory of subsidized housing units, there are 4,433 units serving households with lower incomes. See **FIGURE 3-24**. Affordable housing covenants are set to expire for some of these in the timeframe of the Comprehensive Plan. These include Cerasa Apartments in 2031, Bellevue 10 Apartments in 2035, Pacific Inn Apartments in 2036, Ashwood Court Apartments in 2038 and others. Proactive actions to preserve affordability by finding a preservation buyer, or helping residents who live in properties with expiring affordability restrictions will be important parts of anti-displacement efforts.

TABLE 3-8 Subsidized Housing Units by Area, Bellevue, 2022

Neighborhood	Rental		Homeownership
	Total	Section 8*	
BelRed	125	36	0
Bridle Trails	910	46	1
Cougar Mountain / Lakemont	0	0	37
Crossroads	1,449	121	11
Downtown	510	8	9
Eastgate	53	3	7
Factoria	87	33	0
Lake Hills	548	136	1
Newport	137	22	1
Northeast Bellevue	6	6	0

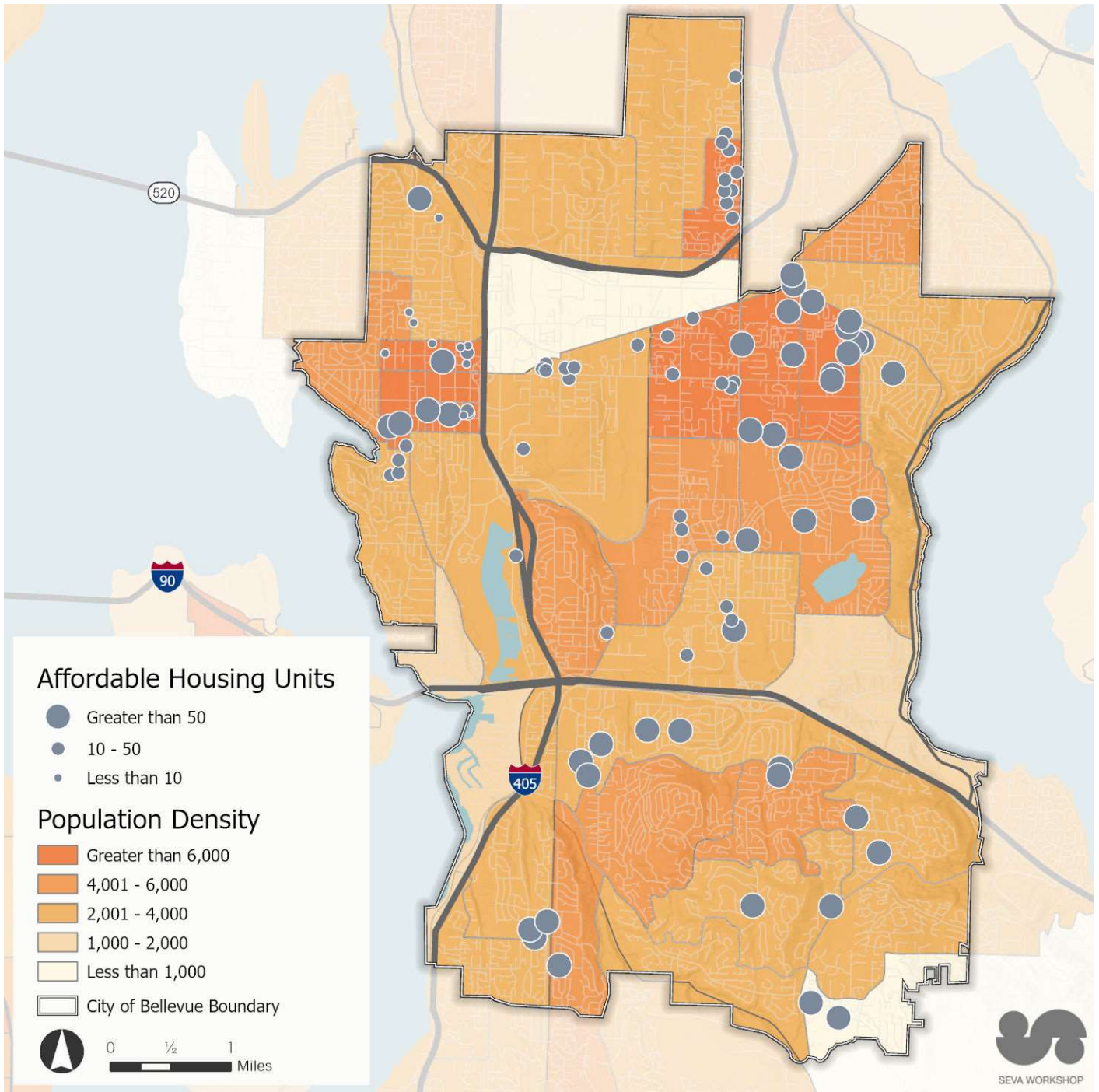
Section 4: Historical Context

Northwest Bellevue	123	1	0
West Bellevue	121	101	7
Wilburton	242	0	7
Woodridge	122	0	0
Total	4,433	513	81

SOURCE: City of Bellevue, 2022; Seva Workshop, 2023.

NOTE: Count of Section 8 units is a subset of rental units. Total number of units in Bellevue is the sum of Total Rental and Homeownership units

FIGURE 3-25 Subsidized Housing Units by Area, Bellevue, 2022



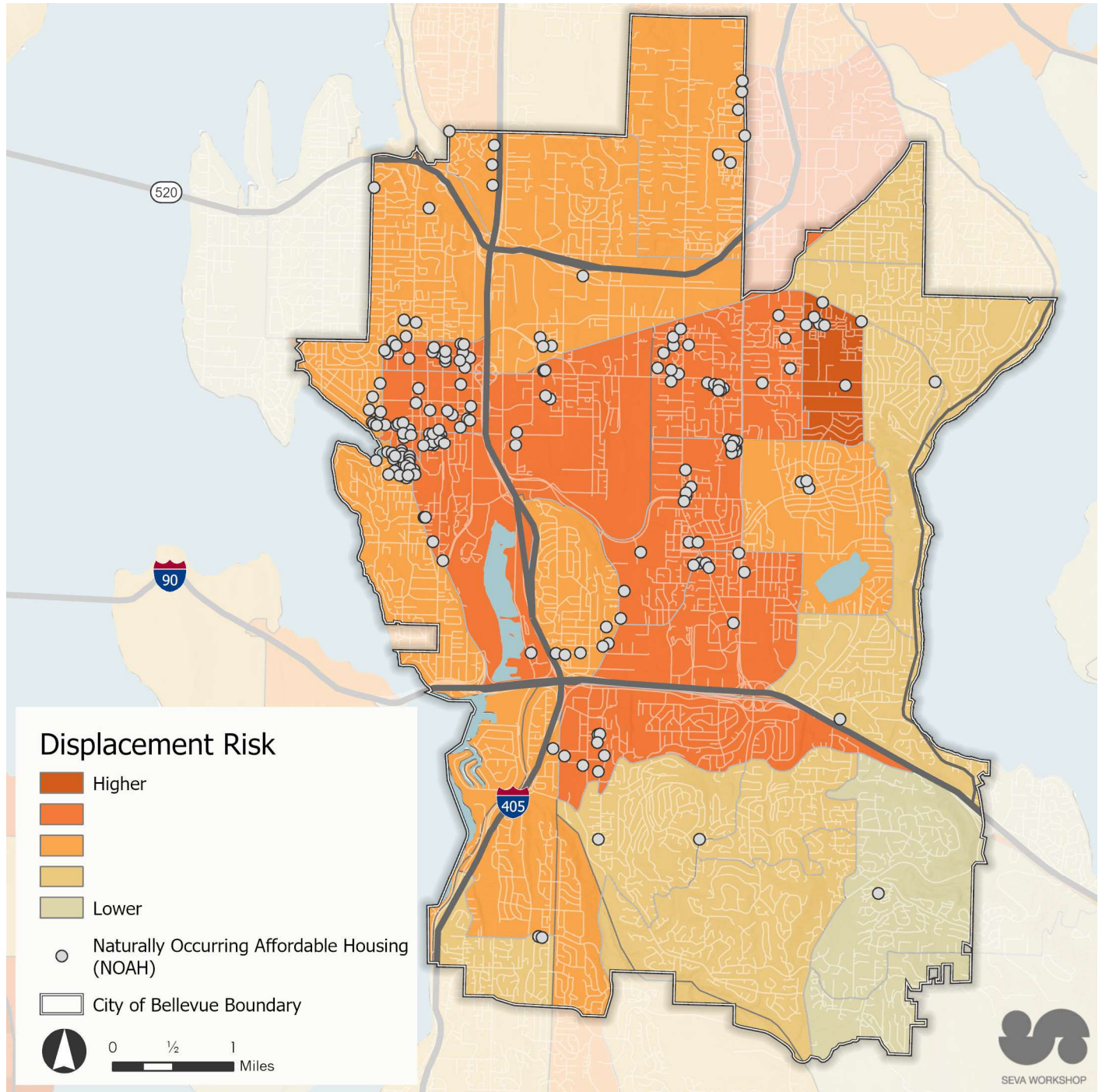
SOURCE: City of Bellevue, 2022; Seva Workshop, 2023.

3.5.4 Displacement Risk

FIGURE 3-27 shows the location of naturally occurring affordable housing (NOAH) properties in Bellevue. It also shows displacement risk based on the Regional Displacement Risk Index, created by the Puget Sound Regional Council. This index combines data at the census tract level about socio-demographics, transportation, neighborhood characteristics, housing, and civic engagement to determine areas which are likely to be the most vulnerable to displacement in the region.

There is some overlap between areas with high NOAH density and higher displacement risk including Crossroads, Lake Hills, and Highlands neighborhoods, as well as areas in and around the downtown center and near the highway system. See **FIGURE 3-26**. Understanding where there is the potential for displacement can be important in crafting policies to mitigate these effects. These areas of need can frame a policy focus for the city to advance key housing preservation efforts that can ensure households do not have to leave the city and move to other locations to find appropriate and affordable housing.

FIGURE 3-27 NOAH and Displacement Risk in Bellevue



SOURCE: CoStar, 2022; HUD CHAS Income Limits, 2022; PSRC Displacement Risk Index, Data collected from American Community Survey (ACS), U.S. Census Bureau; Consolidated Housing Affordability Strategy (CHAS), U.S. Department of Housing & Urban Development (HUD); Google; County elections data; 2011 to 2018; Community Attributes Inc., 2022; Seva Workshop, 2023.

3.6 Summary of Current Conditions

Through the Affordable Housing Strategy and the Comprehensive Plan, the City of Bellevue plans to create a range of housing types and densities that allow the city to maximize recent investments in transit, prioritize affordable housing for very low income families, address past inequities that have shaped the city, and to plan for residential neighborhoods that protect and promote the health and well-being of residents by supporting equitable access to parks, a clean environment, educational and economic opportunity, and transportation options.

The historical context and current conditions set the stage for the implementation of policies and programs to achieve these goals by identifying focus communities for engagement and prioritization. The preceding analysis has consistently demonstrated several themes.

The Crossroads, Eastgate, and Factoria neighborhoods, which proportionally house more Black and Hispanic residents, as well as other communities of color and those identifying as two or more races, have a history of under investment. These neighborhoods have higher levels of exposure to environmental hazards, more difficult access to parks, and schools with lower proportions of students meeting grade level standards.

Segregation in Bellevue by neighborhood is driven in part by the homogeneity of housing types and affordability levels in certain neighborhoods. Multi-family housing, naturally occurring affordable housing, public, and subsidized housing are concentrated in a few neighborhoods of the city, with other neighborhoods are primarily single-family homes. This effectively excludes residents with lower incomes from other parts of the city. Most White and Asian households occupy single family housing, while most Black and Hispanic households are in multi-family housing.

Rapidly rising housing prices are exacerbating wealth inequalities between homeowners and renters, a gap that already exhibited disparities along race and ethnic lines a decade ago. Roughly 41% of White, non-Hispanic households and 50% of Asian households in Bellevue rent their homes, compared to 76% of Black or African American households and 66% of Hispanic or Latino households. Comparing 2020 homeownership rates with 2010 in Bellevue, racial/ethnic disparities have persisted. While White households has experienced a decrease in homeownership, Asian households stayed the same. Black households have experienced little change in ownership rates (while the percentage increase slightly, this is from a very small base, and represents an approximate increase of less than 300 households).

Income disparities exhibit similar patterns by race, putting homeownership farther out of reach, faster, for Black households and Hispanic/Latino households. 65% of White and 72% of Asian households have incomes above 100% AMI while only 47% of Black households and 39% of Hispanic households earn above 100% AMI. Lower incomes coupled with high rents and housing costs translates to housing cost burden. Black households are the most cost burdened (38%), with Hispanic households close behind (34%). Hispanic households are the most likely to be severely cost burdened.

Income also intersects with age, where many households with a member aged 62 or over are living on low to extremely low incomes.

The housing affordability crisis has affected those with the lowest income hardest, but Bellevue is also unaffordable to many of the people who commute to work there. Around 89% of people

employed in Bellevue live outside the city. Affordable and appealing housing choices convenient to Bellevue's employment centers would support transportation and environmental goals in addition to housing goals.

Housing conditions in the City of Bellevue are at risk of growing more inequitable through displacement without specific policy and program interventions, and enforcement of Fair Housing laws. Displacement is already occurring as evidenced by eviction rates, especially along NE 10th in Downtown Bellevue between 100th Ave NE and east until the freeway, the Crossroads neighborhood, and in Eastgate. Looking to the future, the Crossroads, Lake Hills, and Highlands neighborhoods, downtown center, and areas near the highway system estimated to have the greatest displacement risk. In 2019 the Fair Housing Center of Washington testing program observed differential treatment in Bellevue on the basis of race, disability, religion, national origin, and income.

Revising the housing policies in the Comprehensive Plan is an important part of remediating the past inequities described in Section 1 and correcting the disparities in current housing conditions described in Section 2. Section 3 follows with an evaluation of Comprehensive Plan policies.



BELLEVUE 2044

COMPREHENSIVE PLAN

Building A Livable City for All

SECTION 4 Historical Context

4.1 Tribal Use and Early White Settlement

The land now occupied by the City of Bellevue has been the homeland of Coast Salish Tribes—including the Duwamish, Snoqualmie, and Stillaguamish peoples—since time immemorial. For thousands of years, Native people flourished in the region, developing longhouse villages along the shores of Lake Washington and other area waterways. Before contact with Euro-American trade and political relationships, Native social organization was largely oriented around kinship and language communities. While individual families might retain the right to fish, hunt, or gather in specific locations, they did not claim exclusive use or ownership in that area. Most Coast Salish relationships with the land and water were (and continue to be) centered around stewardship and maintaining productivity, rather than individual ownership.

In the mid-1800s, European and American colonizers began to arrive in the Pacific Northwest, bringing with them a new model of land ownership based on private claims to land, water, and resources. While early traders like the Hudson's Bay Company sought cooperation with Tribal entrepreneurs and middlemen in order to facilitate trade, American settlers emphasized homesteading and economic pursuits such as logging, which operated by taking traditional lands from Native Americans.

Throughout the 1850s, Territorial Governor Isaac Stevens led hurried negotiations with the region's Native American Tribes. In 1855, the US government signed the Treaty of Point Elliott with 82 local leaders of Puget Sound Tribes, including those whose traditional lands are what is now Bellevue.⁷ With this treaty and others like it, Tribes throughout the Puget Sound region ceded their traditional lands to the United States, amidst large imbalances in power and poor translation of the treaties themselves during the treaty councils. In exchange, the Tribes received parcels of land as reservations on which to live, as well as promises of

⁷ HistoryLink Staff, "Treaty of Point Elliott, 1855," Historylink.org, January 1, 2000, <https://www.historylink.org/File/2629>.

medicine, money, education, and access to traditional fishing, hunting, and gathering grounds. With this treaty, many Native Americans in the Bellevue area were relocated to reservations elsewhere in the region.⁸

1869 saw the arrival of the first white homesteaders to the Bellevue region, drawn by the discovery of coal in the Coal Creek area and the prospect of logging the land's rich forests. In 1882, Isaac Bechtel Sr. bought and cleared land near present-day downtown.⁹ In the ensuing decade, more settlers followed. By 1890, a small village called Bellevue (254 people according to the 1900 census¹⁰) —named for the view from the postmaster's window or the town in Indiana where he hailed from—had grown up on Meydenbauer Bay, complete with a sawmill, school, farms, and a few businesses.

In 1900, the census recorded 254 people living within the Bellevue Precinct of King County.¹¹ By the time Bellevue was platted in 1904, it had already begun to establish itself as a major hub for berry growing and a popular retreat for wealthy Seattle families.¹²

4.2 Asian Immigration and Exclusion

Chinese immigrants were the first Asians to arrive in Washington State in significant numbers.¹³ In the mid-19th century, many Chinese workers came to the Pacific Northwest to seek gold and, later, work on railroad construction. When the railroad came through what is now Bellevue in the late 1800s, Chinese workers came along with it. By 1880, there were nearly 3200 Chinese living in Washington Territory.¹⁴

At the turn of the century, Japanese immigrants also began arriving in the area, where they cleared the land for agriculture and worked in lumber mills. These workers and families brought with them experience in intensive farming practices (such as fertilization, irrigation, and crop rotation) that proved very effective on small plots of land in the Bellevue area. Many Japanese farming families cultivated berries here, either alongside other crops or as single-crop concerns. Like their white-run neighboring farms, most Japanese families sent their product to Seattle and Tacoma, where it was sold to distributors or directly at Pike Place Market.

These Asian immigrants were subject to exclusionary “Alien Land Laws” and discrimination from the outset. The late 19th and early 20th centuries saw a surge in anti-Asian sentiment across the country. US Congress

⁸ Washington State Department of Ecology, “Washington State Tribal Reservations and Draft Treaty Ceded Areas,” May 12, 2010, <https://goia.wa.gov/sites/default/files/public/WATribalReservationTreatyCeded2010.pdf>.

⁹ Alan J. Stein, “Bellevue -- Thumbnail History,” www.historylink.org (HistoryLink, November 9, 1998), <https://www.historylink.org/file/313>.

¹⁰ United States Census Bureau, “Twelfth Census of the United States: Census Bulletin No. 52” (Washington, D.C., February 6, 1901), <https://www2.census.gov/library/publications/decennial/1900/bulletins/demographic/52-population-wa.pdf>.

¹¹ Alan J. Stein, “Bellevue -- Thumbnail History,” www.historylink.org (HistoryLink, November 9, 1998), <https://www.historylink.org/file/313>.

¹² *ibid*

¹³ Matthew W. Kingle and Center for the Study of the Pacific Northwest, University of Washington Department of History, “A History Bursting with Telling: Asian Americans in Washington State,” Washington.edu, accessed April 2, 2023, <https://www.washington.edu/uwired/outreach/cspn/Website/Classroom%20Materials/Curriculum%20Packets/Asian%20Americans/Asian%20American%20Main.html>.

¹⁴ David Takami, “Chinese Americans,” www.historylink.org (HistoryLink, February 17, 1999), <https://www.historylink.org/File/2060>.

banned Asian immigrants from obtaining citizenship under any circumstances in 1875.¹⁵ This anti-Asian sentiment was enshrined in the 1889 Washington State Constitution, which prohibited land ownership for aliens (non-citizens). Although the prohibition contained an exception for “those who in good faith have declared their intention to become citizens of the United States,” this did not apply to Asian immigrants, since they were ineligible for citizenship.¹⁶ This meant that first generation Chinese and Japanese immigrants were unable to own land in what is now Bellevue. Many instead secured their farmland by contract, share, or lease. Others purchased land in the names of their American-born children or trusted friends.

In 19th century Washington, Chinese laborers were often viewed as a primary threat to the economic interests of white workers, and much of the anti-Asian sentiments were focused on them. The 1882 Chinese Exclusion Act fundamentally altered the shape of Asian communities in the US.¹⁷ This act was the first significant law restricting immigration to the country, providing an absolute ban on Chinese laborers immigrating to the US for 10 years.¹⁸ In Washington State and the Bellevue area, the act severely dwindled existing Chinese American communities, which never grew to rival peer groups in San Francisco or Vancouver, BC.¹⁹ The restrictions also helped fuel anti-Chinese hatred in the region. Violent mobs broke out against Chinese populations in several cities throughout the region, including Tacoma and Seattle, where white mobs expelled Chinese residents in 1885 and 1886.²⁰

After the Chinese, Japanese immigrants became the next target of anti-Asian sentiment in the region at the turn of the century. Throughout the early 1900s, Bellevue publisher and influential politician Miller Freeman fiercely advocated for anti-Japanese laws and, later, the internment of Japanese people.²¹ He was also the founder of the Anti-Japanese League of Washington.²² Thanks in large part to Freeman and the Anti-Japanese League’s efforts, the State passed an Alien Land Law in 1921 that went further than the Constitution’s prohibition on owning land, also taking away non-citizens’ rights to lease or rent land.²³ Japanese farmers in Bellevue and elsewhere scrambled to keep their croplands, switching to contract farm work, extending leases before the law took effect, or (if they could afford it) purchasing lands under their American-born (Nesei) children’s names before that “loophole” was closed by further legislation.

¹⁵ Nicole Grant, “White Supremacy and the Alien Land Laws of Washington State - Seattle Civil Rights and Labor History Project,” depts.washington.edu, 2008, https://depts.washington.edu/civilr/alien_land_laws.htm.

¹⁶ *ibid*

¹⁷ Matthew W. Kingle and Center for the Study of the Pacific Northwest, University of Washington Department of History, “A History Bursting with Telling: Asian Americans in Washington State,” Washington.edu, accessed April 2, 2023, <https://www.washington.edu/uwired/outreach/cspn/Website/Classroom%20Materials/Curriculum%20Packets/Asian%20Americans/Asian%20American%20Main.html>.

¹⁸ National Archives, “Chinese Exclusion Act (1882),” National Archives, September 8, 2021, <https://www.archives.gov/milestone-documents/chinese-exclusion-act#:~:text=It%20was%20the%20first%20significant>.

¹⁹ Matthew W. Kingle and Center for the Study of the Pacific Northwest, University of Washington Department of History, “A History Bursting with Telling: Asian Americans in Washington State,” Washington.edu, accessed April 2, 2023, <https://www.washington.edu/uwired/outreach/cspn/Website/Classroom%20Materials/Curriculum%20Packets/Asian%20Americans/Asian%20American%20Main.html>.

²⁰ David Takami, “Chinese Americans,” www.historylink.org (HistoryLink, February 17, 1999), <https://www.historylink.org/File/2060>.

²¹ David Neiwert, “The Xenophobic Career of Miller Freeman, Founding Father of Modern Bellevue,” International Examiner, May 10, 2022, <https://iexaminer.org/the-xenophobic-career-of-miller-freeman-founding-father-of-modern-bellevue/>.

²² Tom Ikeda, “So Who Is Miller Freeman Anyway?,” Densho, March 2, 2020, <https://densho.org/catalyst/so-who-is-miller-freeman-anyway/>.

²³ Nicole Grant, “White Supremacy and the Alien Land Laws of Washington State - Seattle Civil Rights and Labor History Project,” depts.washington.edu, 2008, https://depts.washington.edu/civilr/alien_land_laws.htm.

While these Alien Land Laws made it difficult for Japanese farmers, many families remained in the berry business until World War II. World War II, however, had a devastating impact on Bellevue’s Japanese-American community. On February 19, 1942, President Roosevelt issued Executive Order 9066, requiring the removal of 120,000 Japanese and Japanese-Americans from the West Coast to inland concentration camps.²⁴ Approximately 300 Japanese and Japanese Americans were forcibly removed from their homes in Bellevue and incarcerated in internment camps. Only 11 of Bellevue’s 60 first- and second-generation Japanese families returned to the area after the war.²⁵

After voters failed to overturn the Alien Land Laws in both 1960 and 1962, they were finally repealed in 1966 thanks to persistent efforts by the Japanese American Citizens League (JACL). Washington was one of the last states in the country to still have Alien Land Laws intact.²⁶

4.3 Racial Covenants

In the midst of this struggle, Bellevue continued to grow as a city, swelling from 566 inhabitants in 1910²⁷ to 12,809 by 1960.²⁸ 1917 saw the completion of the Ship Canal, allowing water-based access from Bellevue to Puget Sound and leading to an increase in businesses—particularly maritime-focused industries. Nonetheless, farming remained a primary industry in Bellevue until the construction of the first bridge across Lake Washington 1939. This made Bellevue a true suburb and a premier destination for auto commuters. In 1946, developer Kemper Freeman Sr.—son of Miller Freeman—opened the first shopping mall at Bellevue Square, replacing many Japanese-American-owned strawberry farms that had stood there just a few years earlier.²⁹ 1953 saw the official incorporation of Bellevue, with plans already underway to develop the young community into a large city based around automotive transport. A second bridge in 1963 solidified Bellevue’s place as a central hub of the eastern suburbs.

Racist and exclusionary housing practices were woven into the city’s fabric throughout its growth. Except for a small concentration of homes in the western part of the city, Bellevue remained mostly rural before 1950. Unlike neighboring Seattle during the early-mid 1900s, Bellevue was not subject to redlining—a discriminatory practice by which banks, and others refused loans for people of color to purchase homes in specific neighborhoods. In practice, redlining restricted where people could buy or rent based on their race and ethnicity, often sequestering people of color to specific neighborhoods within a city.³⁰ Since Bellevue remained quite small (with a population of less than 6,000 at the time of its incorporation in 1953), it had few neighborhoods for government entities and banks to formally “redline” during the rise of the practice in the 1930s and 1940s. As the city grew in the ensuing decades, few people of color moved to the city, with over 97% of Bellevue residents identifying as White in 1970.

²⁴ Laurie Mercier, “Japanese Americans in the Columbia Basin,” The Columbia River Basin Ethnic History Archives, accessed April 3, 2023, <https://content.libraries.wsu.edu/digital/collection/cchm/custom/ja-overview..>

²⁵ City of Bellevue, WA, “About Us,” City of Bellevue, accessed April 2, 2023, <https://bellevuewa.gov/discover-bellevue/about-us>.

²⁶ Nicole Grant, “White Supremacy and the Alien Land Laws of Washington State - Seattle Civil Rights and Labor History Project,” depts.washington.edu, 2008, https://depts.washington.edu/civilr/alien_land_laws.htm.

²⁷ United States Census Bureau, “Thirteenth Census of the United States Taken in the Year 1910: Supplement for Washington,” 1912, <https://www2.census.gov/library/publications/decennial/1910/abstract/supplement-wa.pdf>.

²⁸ United States Census Bureau, “Number of Inhabitants: Washington” (1960 Census, 1960), <https://www2.census.gov/library/publications/decennial/1960/population-volume-1/41887126v1p49ch2.pdf>.

²⁹ Alan J. Stein, “Bellevue -- Thumbnail History,” www.historylink.org (HistoryLink, November 9, 1998), <https://www.historylink.org/file/313>.

³⁰ Doug Honig, “Redlining in Seattle,” www.historylink.org (HistoryLink, October 29, 2021), <https://www.historylink.org/File/21296>.

Despite the lack of formal redlining, there were other means by which people of color could be discouraged from moving to Bellevue. Throughout the 1920s, 1930s, and 1940s, restrictive covenants played a major role in urban development across the country. Neighborhoods throughout the region—including those of Bellevue—adopted deed restrictions to keep out non-White families. These deed restrictions forbid property owners from selling, leasing, or renting to specified groups because of their race, color, or religion. When such a covenant existed on a property deed or plat map, the owner was legally prohibited from selling to members of the specified minority groups.

The use of racial covenants first emerged in 1917, when the US Supreme Court deemed city segregation ordinances illegal. While the city itself could no longer create segregated neighborhoods, private land owners and developers were not similarly restricted by the Fourteenth Amendment. The practice was further encouraged by the National Housing Act of 1934, which introduced the practices of “redlining” areas that were considered risky for mortgage support—resulting in intensified racial segregation in many cities. In some areas, such as Seattle’s Capitol Hill neighborhood, residents started their own campaigns and convinced entire swaths or property owners to voluntarily add such restrictions to their deeds. In Bellevue, however, many of the racial restrictions were placed on new properties by land developers. Realtors also encouraged racial covenants as they believed it would keep property values higher in white neighborhoods, confining people of color to “open neighborhoods.”

From 1928 through 1949, racial covenants were placed on at least 624 land parcels within Bellevue. Nearly all of these restrictions were in West or Northwest Bellevue. There are only two documented parcels with racial restrictions located east of Interstate 405’s current route, although this is likely because very few houses existed in that area prior to 1949. Although the racially restrictive covenants differed in their exact language, the intended effect was clear: to prevent non-White people from living on the property. For example, the Enatai Waterfront Addition in 1928 specified what groups were not allowed in the 75 parcels it encompassed: “No person of African, Japanese, Chinese, or of any other Mongolian³¹ descent shall be allowed to purchase, own or lease said real property or any part thereof.” Most covenants, however, simply stated that the property could not be “used or occupied by any person other than one of the White or Caucasian race.”³² Although not technically within Bellevue’s borders, a now jarring “Aryans only” restriction was included for the Lake Washington Gardens neighborhood in Clyde Hill in 1949.³³ To date, researchers have found no restrictive covenants that excluded Mexicans or Native Americans in the region, although such specifications were common in other US cities, such as Los Angeles.³⁴

In 1945, the US Supreme Court ruled in *Shelley v. Kraemer* that, although racially restrictive covenants are private, non-governmental contracts, they violated the Fourteenth Amendment and therefore legally unenforceable. This ruling, however, did not put a stop to their use in practice. While racial covenants could not be legally enforced, they could still be established and privately enforced. Significantly, social enforcement of these covenants was always equally important to their efficacy. Realtors and property

³¹ In the terminology of the 1920s-1940s, “Mongolians” meant all east Asians

³² The Seattle Civil Rights & Labor History Project, University of Washington, “Racial Restrictive Covenants,” 2010, <https://depts.washington.edu/civilr/covenants.htm>.

³³ *ibid*

³⁴ Catherine Silva, “Racial Restrictive Covenants: Enforcing Neighborhood Segregation in Seattle” (Seattle Civil Rights and Labor History Project, University of Washington, 2009), https://depts.washington.edu/civilr/covenants_report.htm.

owners continued to discourage individuals of color from moving into traditionally white neighborhoods through threats, harassment, and rampant discrimination. Black, Asian, Jewish, and other minority families were often told—explicitly or implicitly—that they would not be welcome in prospective neighborhoods with racial covenants, regardless of their enforceability.³⁵

4.4 Growth and Diversity

The 1968 Fair Housing Act prohibited the “discrimination of sale, rental, and financing of dwellings and other housing-related transactions, based on race, color, national origin, religion, sex.” Although social discrimination continued, the law officially made the use of racial covenants illegal. It did not, however, force the removal of existing restrictions from property deeds. Today, discriminatory language remains in many property deeds, often unbeknownst to current owners. The Racial Restrictive Covenants Project— involving research teams at the University of Washington and Eastern Washington University—is now working to document these restrictions throughout the state and notify property owners so they may remove the racist language from their deeds.

From the 1970s through present day, Bellevue has seen an explosion in growth—from a population of 12,809 in 1960 to 151,854 in 2020.³⁶ While some of this expansion has come from annexation of adjacent lands (for example, Bellevue quintupled in size throughout the 1950s and 1960s), the growth of high-tech firms has significantly contributed to the population increase by attracting workers, many of whom are foreign born.^{37,38}

This growth in population has been accompanied by an increase in diversity by race, ethnicity, and language spoken at home. In the 1970 Census, over 97% of Bellevue residents identified as White.³⁹ By 2010, “White alone” residents accounted for less than 63% of the population.⁴⁰ Today, half of Bellevue’s population are people of color and about 43% speak a language other than English at home.⁴¹ Bellevue’s Asian population has been the fastest growing minority group since the 1990s, with Chinese and Asian Indian residents increasing the most.

This growing diversity, however, has not necessarily been evenly distributed, due in part to exclusionary zoning. Zoning policies that only allow single family homes or only low density residential effectively

³⁵ Catherine Silva, “Racial Restrictive Covenants: Enforcing Neighborhood Segregation in Seattle” (Seattle Civil Rights and Labor History Project, University of Washington, 2009), https://depts.washington.edu/civilr/covenants_report.htm.

³⁶ United States Census Bureau, “Quick Facts: Bellevue City, Washington,” Census.gov, accessed April 2, 2023, <https://www.census.gov/quickfacts/fact/table/bellevuecitywashington/POP010220>.

³⁷ City of Bellevue, WA, “Population,” City of Bellevue, accessed April 2, 2023, <https://bellevuewa.gov/city-government/departments/community-development/data/demographic-data/population-trends>.

³⁸ City of Bellevue, “Bellevue Demographic Profile,” December 2022, https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/Demographic_Infographic_12_21_2022_2.pdf

³⁹ United States Census Bureau, “1970 Census of Population: Washington,” February 1971, <https://www2.census.gov/library/publications/decennial/1970/pc-v2/15872858v2ch6.pdf>.

⁴⁰ United States Census Bureau, “Census 2010, Summary File 1: Bellevue City, WA,” August 2, 2011, https://ofm.wa.gov/sites/default/files/public/legacy/pop/census2010/sf1/data/city/wa_2010_sf1_city_16000US5305210.pdf.

⁴¹ City of Bellevue, “Cultural Diversity,” City of Bellevue, accessed April 3, 2023, <https://bellevuewa.gov/city-government/departments/community-development/data/demographic-data/cultural-diversity>.

exclude households with lower incomes and contribute to uneven distribution of diversity because of the link between race/ethnicity and income (discussed in more detail in Section 3). While the Crossroads neighborhood (which includes significant multi-family housing stock) has the highest percentage of households of color in the city with approximately 71% of residents identifying as non-white, other areas of the city report less than 45% of non-white residents.⁴²

TABLE 4-1 Racial Covenants in Bellevue⁴³

Subdivision (Plat)	Neighborhood ⁴⁴	Racial Restriction	Parcels Covered	Year
Enatai Waterfront Addition	West Bellevue	No person of African, Japanese, Chinese, or of any other Mongolian descent shall be allowed to purchase, own or lease said real property or any part thereof.	75	1928
Pleasure Point Park Div. 1, 2 (unrecorded)	Willburton	It is understood and agreed that said premises shall be used for residential purposes only and cannot be reconveyed to aliens, disorderly persons, or persons not of the Caucasian race.	2	1928 – 1943
Shorelands	West Bellevue	That neither said premises, nor any interest therein shall at any time be leased, sold, devised or conveyed to, or inherited by or otherwise acquired by, become the property of, used or occupied by any person other than one of the White or Caucasian race, provided however, that persons not of the White or Caucasian race may be kept thereon by such a Caucasian occupant strictly in the capacity of servants of such occupants.	64	1929
Maxwell Braes Addition	West Bellevue	No part of the lands shall ever be used or occupied by any person other than members of the Caucasian race, except that this Covenant shall not prevent occupancy by domestic servants of a different race domiciled with an owner or tenant.	140	1943
Bellevue Park Add	West Bellevue	No part of the lands shall ever be used or occupied by any person other than members of the Caucasian race, except that this Covenant shall not prevent occupancy by domestic servants of a different race domiciled with an owner or tenant.	190	1943
Killarney No. 2	West Bellevue	No person of any race other than the White race shall use or occupy any building or lot, except that this covenant shall not prevent occupancy by domestic servants of a different race domiciled with an owner or tenant.	47	1946

⁴² Civil Rights & Labor History Consortium, University of Washington, “Mapping Race and Segregation in Seattle and King County 1940-2020,” [depts.washington.edu](https://depts.washington.edu/labhist/maps-race-seattle.shtml), accessed April 2, 2023, <https://depts.washington.edu/labhist/maps-race-seattle.shtml>.

⁴³ The Seattle Civil Rights & Labor History Project, University of Washington, “Racial Restrictive Covenants,” 2010, <https://depts.washington.edu/civilr/covenants.htm>.

⁴⁴ City of Bellevue, WA, “Neighborhood Areas [Map],” April 3, 2020, https://apps.bellevuewa.gov/gisdownload/PDF/Planning/NeighborhoodAreas_8x11.pdf.

Subdivision (Plat)	Neighborhood ⁴⁴	Racial Restriction	Parcels Covered	Year
Manor Hill Addition	Northwest Bellevue	No person of any race other than the White or Caucasian race shall use or occupy any building or any lot, except that this covenant shall not prevent occupancy by domestic servants or a different race domiciled with an owner or tenant.	59	1947
Sibley Wood	West Bellevue	"No Property in Sibley Wood addition shall at any time be used or occupied by any person or person not of the white and Gentile and Caucasian race. No person other than one of the white and Gentil can Caucasian race shall be permitted to occup any property in said addition or portion of a building theron except a domestic servant actually employed by a person of the white and Gentile and Caucasian race where the latter is an occupant of such property."	31	1947
The Diamond S Ranch	Northwest Bellevue	No property in said addition shall at any time be sold, conveyed, rented, or leased in whole or in part to any person or persons not of the White or Caucasian race. No person other than one of the White or Caucasian race shall be permitted to occupy any property in said addition or portion thereof except a domestic servant actually employed by a person of the white or caucasian race where... an occupant of the property.	16	1949