Burien Housing Policy Evaluation

Racially Disparate Impacts, Displacement, and Exclusion in Housing

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1 Introduction

Purpose

Population growth has outpaced housing supply over the 20 years. Costs to buy or rent homes have risen across the state, affecting every community including Burien. While all households are impacted, communities of color spend more of their income on housing, tend to live in lower quality housing, and own fewer homes[1] which has led to a generational wealth gap.

Increasing housing opportunity for everyone will benefit all Washingtonians including residents of Burien. However, there are still persistent gaps in housing opportunity for people of color due to historical and current practices that result in benefits to some households and burdens to others. Burien has developed a Housing Action Plan (2021) and identified housing resources. On its Housing Affordability web page, Burien has identified why addressing local housing gaps is important to the community:

> *Housing affordability is an issue that affects all Burien residents. Rising housing costs can lead to the displacement of long-term residents, uprooting lives and undermining the stability of both neighborhoods and the business community. A lack of affordable housing also makes it difficult to hire and retain teachers, nurses, firefighters, and other essential members of the community. Small businesses may decide to go elsewhere when owners are unable to live close to their jobs. Maintaining a healthy and sustainable city means that Burien will need to evaluate its current housing stock and consider building more and different types of housing to meet the diverse and growing needs of our population and workforce. The City of Burien is committed to addressing policy barriers to housing affordability in Burien so that Burien's working families and seniors can continue to call Burien home.*
> *(https://www.burienwa.gov/business/community_development/housing_affordability)*

Consistent with the Growth Management Act amendments in HB 1220, each city and county has a duty to begin to undo policies and practices that lead to racially disparate impacts, displacement,

[1] See the Department of Commerce report titled "Improving Homeownership Rates for Black, Indigenous, and People of Color in Washington: Recommendations from the Homeownership Disparities Work Group" (2022).

and exclusion in housing. As noted in the State of Washington Department of Commerce guidebooks,[2] the requirements are not a charge against current communities in which there are racially disparate outcomes in housing, but an acknowledgement of the role land use policy has played in creating and institutionalizing race-based advantages and disadvantages. The statute uses the term "racially disparate" but does not identify protected groups based on race.[3]

The Department of Commerce has developed a draft guidebook on how to respond to the need to consider Racially Disparate Impacts. The Guidebook defines racially disparate impacts as: **"When policies, practices, rules or other systems result in a disproportionate impact on one or more racial groups."** The steps to review the policies, practices, and rules for disproportionate impact are summarized in Exhibit 1. Additional definitions of terms are included in the text box on following pages.

Exhibit 1: Racially Disparate Impacts Process Checklist

Step 1 and throughout Engage the Community



- ☑ Did you **review historical factors** that may have had a racially disparate impact?
- ☑ Did you **review the results of previous engagement** efforts to identify gaps and engagement priorities?
- ☑ Did you **meet with representatives of communities** that have been subject to historical injustices, different racial identities, or those most impacted by housing struggles?
- ☑ Does your **Public Participation Plan provide opportunities** for impacted community members to influence the interpretation of data analysis, identify root causes, and provide input on potential policy solutions?

Step 2 Gather and Analyze the Data



- ☑ Did you look at housing data **disaggregated by race**?
- ☑ Did you determine whether there is **evidence of racially disparate impacts, displacement, or exclusion in housing**?
- ☑ Did you conduct a **displacement risk assessment**?
- ☑ Did you **review the data evidence** with impacted community members to hear their perspectives on the policies, regulations, actions or root causes driving the disparities in outcomes?

[2] See Racially Disparate Impacts guidance at project website: https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/updating-gma-housing-elements/.

[3] Through HB 1220 GMA Housing Element requirements were also adjusted regarding planning for housing at all income levels. In addition, the City will consider policies and regulations to remove barriers to moderate density housing types such as townhouses, multiplexes, accessory dwelling units, small apartments, etc. to meet HB 1220 provisions to address moderate density housing (also called missing middle housing). Occasional references to those other requirements are made in this document, but will be more fully addressed in later stages of the City's Middle Housing Grant and its overall Comprehensive Plan Update.



Step 3 Evaluate Policies

- ☑ Did you establish **goals and objectives** to address identified housing needs and/ or racially disparate impacts, displacement, or exclusion in housing?
- ☑ Did you establish an **evaluation rubric** tied to your goals and objectives?
- ☑ Did you evaluate existing policies for the destitution of **benefits and burdens**?
- ☑ Did you systematically **evaluate all existing goals and policies** for how they may contribute to the identified housing needs and/ or address and begin to undo racially disparate impacts?



Step 4 Revise Policies

- ☑ Did you identify policy and **goal alternatives or improvements** to address and begin to undo racially disparate impacts?
- ☑ Did you identify and adopt **anti-displacement** policies to support those who are most at risk of displacement in your community?
- ☑ Did you **vet** the goal and policy improvement with impacted community members?
- ☑ Did you review the policy updates for **consistency** with other parts of the comprehensive plan?
- ☑ Does the **policy language** provide clear direction for implementation including updates to development regulations, permitting processes, fee structures and programming decisions?
- ☑ Are the policies **clear in their intent** and provide clarity for measurement and tracking success?



Step 5 Update Regulations

- ❑ Did you **implement regulations** consistent with your policies to address and begin to undo racially disparate impacts, displacement and exclusion?

This document presents results of step 2 and step 3 – gather and analyze data and evaluate policies. It also begins Step 1 community engagement by reviewing historical factors leading to potential racially disparate impacts and integrating the results of prior engagement such as Burien's Housing Action Plan in 2021. The information in Steps 2 and 3 will inform planned public engagement.

In Spring 2023, the City intends to gather housing stories about exclusion and displacement with community based organizations. Additionally, proposed amendments to policies and codes in Step 4 will be vetted with community based organizations, for profit and non-profit developers, and Burien 2044 Comprehensive Plan Advisory Committee.

Policy and code amendments will be revised and folded into the Comprehensive Plan Update. Additional public engagement will be part of the Comprehensive Plan Update in fall 2023 and through 2024.

Selected Definitions

HB 1220 added new terms in the housing element statute with subsections e-h above. Commerce developed the following definitions with a statewide stakeholder group of planners to create a common understanding of the undefined terms.

- **Discriminatory effect:** The effect, regardless of intent, of differentiated outcomes for a group based on a protected classification. May be an action or failure to act. Protected classifications include race/color, national origin, religion/creed, sex/gender/domestic violence status, familial status, disability, marital status, sexual orientation and military/veteran status.
- **Disinvestment:** A process by which a community is not prioritized for investment, or by which a system, policy or action disincentivizes investment in a specific area. Disinvestment processes occur over time, often in the long term.
- **Displacement**: The process by which a household is forced to move from its community because of conditions beyond their control. *Physical displacement: Households are directly forced to move for reasons such as eviction, foreclosure, natural disaster or deterioration in housing quality. Economic displacement: Households are compelled to move by rising rents or costs of home ownership like property taxes. Cultural displacement: Residents are compelled to move because the people and institutions that make up their cultural community have left the area.*
- **Displacement risk:** The likelihood that a household, business or organization will be displaced from its community.
- **Exclusion in housing:** 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 leads to non-inclusive impacts.
- **Gentrification:** The process of neighborhood change resulting in households being unable to remain in their neighborhood or move into a neighborhood that would have been previously accessible to them. The neighborhood change includes economic change in a historically disinvested neighborhood, such as rising land values and rising housing costs, as well as demographic change representing a shift in the income, racial composition, or educational level of residents. This is also referred to as "neighborhood exclusionary change" or "exclusionary displacement." Gentrification creates discriminatory effects when it forces the displacement of long-time residents and businesses.[4]
- **Inclusionary zoning:** A regulatory tool that requires permanent affordable units to be included within new residential development projects, or requires payment for construction of such units elsewhere (fee-in-lieu). "Permanent" refers to affordable unit availability in the long term, specifically, for 50 years as defined by Washington code.
- **Infrastructure:** The facilities and systems that serve a country, city, or area, such as transportation, parks, communication systems, energy and utility systems, and schools.
- **Market forces:** Economic factors that impact the provision, price and/or demand for housing.
- **Racially disparate impacts:** When policies, practices, rules or other systems result in a disproportionate impact on one or more racial groups.

[4] Definition adapted from the Urban Displacement Project. See https://www.urbandisplacement.org/about/what-are-gentrification-and-displacement/

Summary Racially Disparate Findings

Community Understanding: History and Trends

Prior to White settlement Burien was part of "winter towns inhabited by Lushootseed-speaking peoples, including the Duwamish, Suquamish, Muckleshoot, and Puyallup." (DeCoster 2013) Through treaties and exclusion, tribes were largely displaced and relocated to reservations; some tribal members chose to remain in their original homelands including Burien.

After settlement by homesteaders in the 1870s and 1880s, Burien transitioned over decades from a rural community to a suburb of Seattle. The platting of Burien was similar to other places in south King County. In the early and middle 20th century restrictive covenants were recorded on 1,800 lots in Burien to exclude non-White races on properties (about 9% of the 20,000 platted lots recorded with restrictive covenants in King County). By the middle of the 20th century such covenants were found unconstitutional and illegal and no longer enforced.

From homesteading through most of the 20th Century, Burien has been a predominantly White area but between 2000 and 2020 became a much more diverse community with no one race in the majority – the community is home to communities of White, Hispanic or Latino, Asian, Black, and other races and ethnicities including foreign born refugees and immigrants.

Burien inherited plans and zoning from King County at the time of its incorporation in 1993 and has generally continued a pattern of single family zoning in a majority of the city limits[5] with concentrated nodes of multifamily and commercial housing downtown and along major arterials. Some annexations and zone changes were made in the last 20 years, and the establishment of small businesses and housing redevelopment in Downtown has reinvigorated the heart of the community, but largely the density and pattern of development that started pre-incorporation has stayed.

Areas of smaller single family lots in north and central Burien, zoned RSF 7,200, have seen more affordable homeownership opportunities and are the most racially diverse areas. Concentrated areas of non-White populations are found in the denser multifamily areas. More recent development on the west side of the community with views of Puget Sound, Lake Burien, or other vistas have lower density zoning, and have households with higher incomes. It is a less diverse area racially. See Exhibit 2.

[5] About 78% of the city's land is zoned as Residential Single Family (RSF)

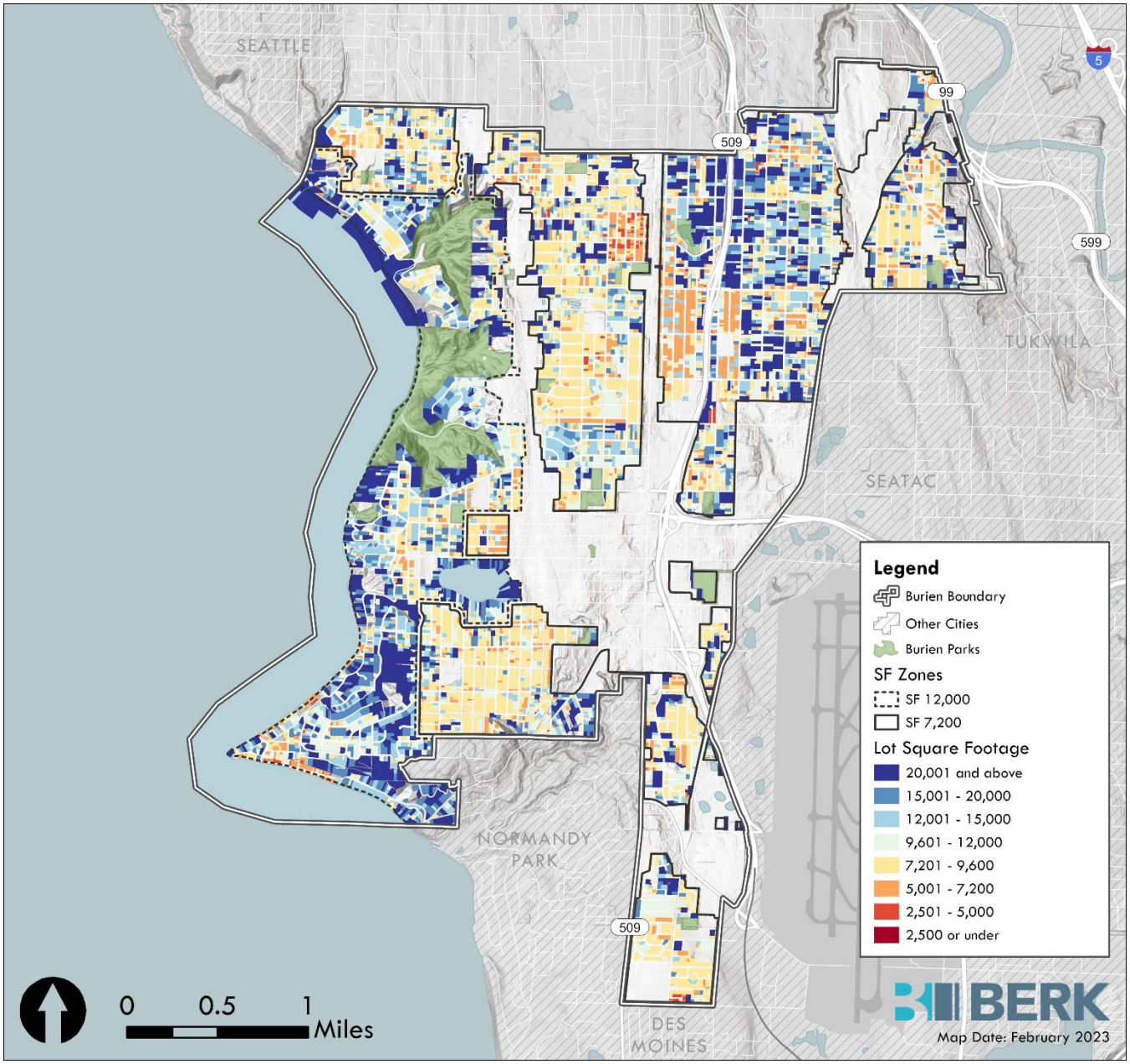
Exhibit 2: Burien Racial Makeup 2020

Race	Burien City 2020	SF 12,000 zone
White alone	45%	68%
Black alone	7%	4%
American Indian or Alaskan Native alone	1%	1%
Asian alone	14%	8%
Native Hawaiian or Other Pacific Islander alone	2%	1%
Other alone	1%	
Two or more	6%	
Hispanic or Latino of any race	24%	18%

Source: US Census 2020, City of Burien 2019, BERK 2023.

Comparing code standards for lot sizes to actual platted land, there are lots that are both much smaller than standards as well as those that are larger. In either case, this may allow for consideration of alternative zoning standards or housing types to increase moderate density housing and promote homeownership to build wealth as well as offer housing styles that fit a range of needs including multigenerational housing. See Exhibit 3.

Exhibit 3: RS Zones and Lots Sizes



Source: King County Assessor, City of Burien, BERK, 2023.

Racially Disparate Impacts

Reviewing socioeconomic data, there appear to be racial disparities in homeownership and housing costs and some disparities in amenities:

- Homeownership rates are higher for White and Asian persons and lower among Hispanic, Black, and other races and ethnicities.

- Poverty rates are higher in Burien than King County and within Burien, the poverty rate is higher for non-White households.
- Homeownership and rental costs are increasing for all households and the income levels of non-White households is lower for BIPOC populations.
- Non-White workers are more likely to commute by carpool or bus especially immigrants and Black residents.
- School performance results for language, math and science and attendance are generally low in Burien but performance is better at schools in neighborhoods with more White populations.
- Populations of all races have a similar share in walking distance of park or school, not accounting for size or quality.

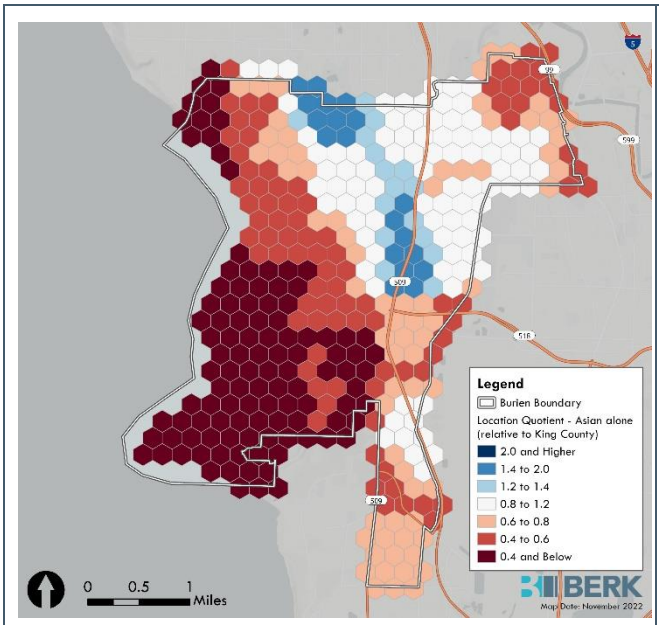
Exclusion and Displacement

The "suburbanization of poverty" has been a regional trend in the metropolitan area, and populations in need of affordable housing have moved south out of Seattle. Burien has become a refuge for affordable "close in" housing. A result has been a more diverse and vibrant Burien, which has an especially higher share of Hispanic and Latino residents compared to the county as well as other pockets with higher shares of Black and Asian residents.

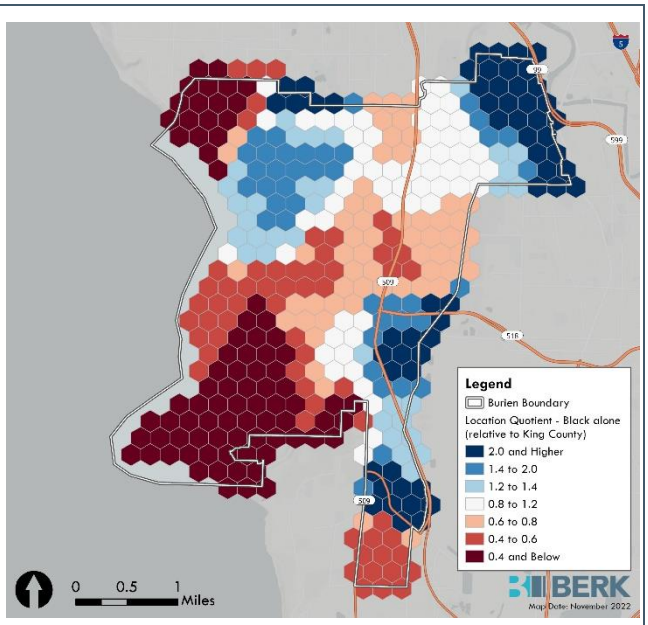
While most residents who work commute to Seattle and other south King County communities, the largest share of workers commuting into Burien come from Seattle and other South King County places. People who commute out of Burien are similar in age and incomes to those who commute in. This shows that Burien is not exclusively for different populations during the daytime versus the nighttime.

Exhibit 4: Concentrations of Race in Burien – Relative to King County

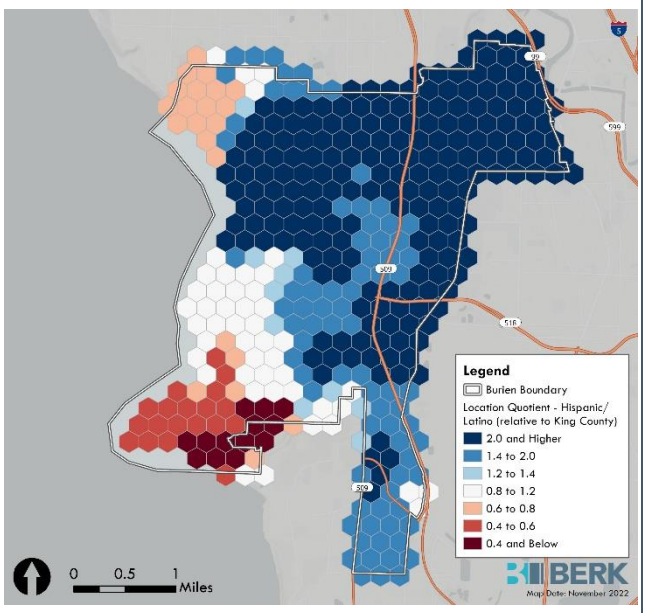
Blue Greater than County, Red less than County



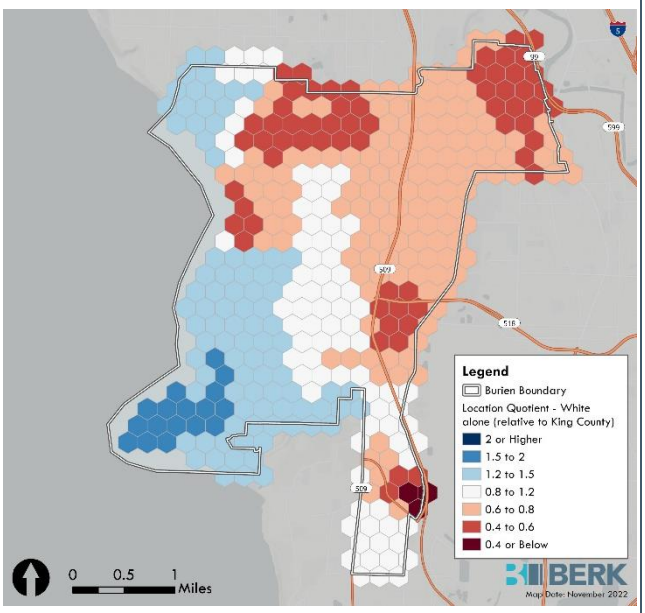
Asian Alone



Black Alone



Hispanic/Latino



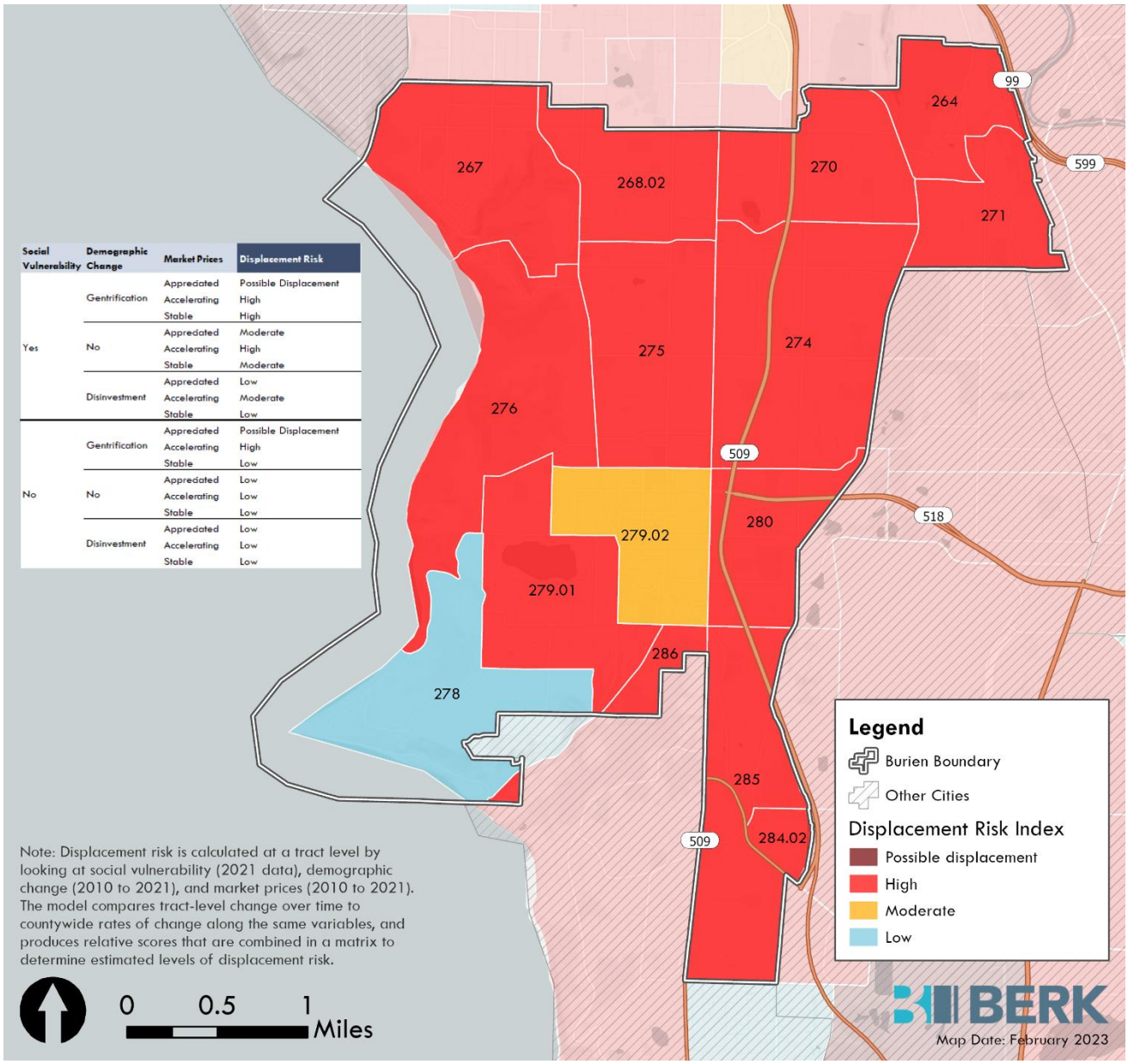
White Alone

Source: US Census 2020, BERK 2023.

While Burien has been affordable in the recent past, much of the city is at risk for displacement – nearly all census tracts show demographic change/gentrification and rising housing prices considering social vulnerability, demographic change (gentrification), and market prices. There is naturally occurring affordable housing in moderate densities and higher densities that is at risk of

loss in the next 10 and 20 years. Evictions are relatively high in some block groups such as where older multifamily developments are found (e.g., near Ambaum) before and after the pandemic for reasons including failure to pay, lease violations, and owners wishing to sell buildings.

Exhibit 5: Displacement Risk 2020: Social Vulnerability, Demographic Change, Market Prices



Source: BERK 2023.

Policy Evaluation Findings

This evaluation reviewed the Housing, Land Use, and Community Character elements of the Comprehensive Plan in relation to the following questions:

- 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?

The results highlighted some overall adjustments that could increase inclusion and reduce disparate impacts, such as:

- **Strengthening policy language to protect naturally occurring affordable housing.** This type of housing is found throughout Burien, and particularly long-standing apartments along corridors well as with numerous multiplexes (fourplex in particular).
- **Promoting single family areas as locations where affordable and varied housing choices are a focus, e.g., middle housing.** This includes allowing townhouses (e.g., fee simple or otherwise), multiplexes (duplex, triplex, fourplex), and small apartments to meet HB 1220 provisions to address moderate density housing. This also means continuing to allow and refine accessory dwelling unit requirements.
- **Consolidating some residential designations for flexibility in underlying zoning, densities, and housing styles.** Consolidating some commercial and mixed use designations and adjusting restrictions on housing as part of mixed use only.
- **Amending vague language around design and character.** Without clarity this could impede allowing new forms of housing and create barriers in permitting. Clear standards for quality and healthy homes are important.
- **Referencing newer housing targets by income band and special needs.** This is now proposed in Countywide Planning Policies and differs from the shares expected in the HAP.

2 Community Understanding

Burien's History and People

This chapter provides a history of laws, policies, or programs in Burien that intentionally or unintentionally created barriers to secure and affordable rental and ownership housing by non-White races or ethnic groups, or those defined by immigration status or language.

Burien was unincorporated and governed by King County until 1993. In 1993 the City incorporated an area of about 9 square miles with a population of about 27,700. (DeCoster 2013)

Burien has become a more diverse population: From 1990 to 2020, Burien has become a more racially and ethnically diverse community. From 2010 to 2020 Burien became a city where no single racial/ethnic group comprises more than 50% of the population. As described more in Chapter 3, White alone residents comprise 45% of the population, about 25% identify as Hispanic or Latino, and 14% of the population as Asian.

Exhibit 6. Share of Population White Alone Non-Hispanic

Year	Population	Share White Alone
1990*	25,089	88.5%
2000	31,881	71.5%
2010	33,313	57%
2020	52,066	45%

*Burien Census Designated Place

About 25.1% of Burien's population is foreign born as of 2020. About 44.9% of the foreign born are naturalized citizens and 55.1% are not. Regions of birth include Latin America (41.7%), Asia (34.9%), Africa (16.1%), Europe (4.3%), North America (1.8%) and Oceania (1.2%). Over one third of Burien residents speak a language other than English and home, and nearly 20% speak English less than very well.

Exhibit 7. Language Spoken At Home

Year	Percent Language other than English	Percent Speak English Less than Very Well
2000	19.5%	9.5%
2010	27.7%	15.2%
2020	34.7%	18.2%

Source: US Census Bureau, data.census.gov

The table in Exhibit 8 summarizes the language spoken at home for Burien-area students, which highlights the prevalence of Vietnamese and Somali. Other languages identified include Amharic, Cambodian, Arabic, Punjabi, Tigrinya, and Tagalog. This list is limited to students within the Highline School District, but likely reflects trends of the larger population.

Exhibit 8: Language Spoken at Home for Burien Area Public School Students, 2022.

Language	Students	Percent
English	4,790	63.1%
Spanish	2,189	28.8%
Vietnamese	276	3.6%
Somali	113	1.5%
Amharic	54	0.7%
Cambodian	49	0.7%
Arabic	40	0.5%
Punjabi	36	0.5%
Tigrinya	25	0.3%
Tagalog	22	0.3%

Note: This data only includes public school students within the Highline School District. It is an estimate of actual student counts based on the location of the public school relative to Burien's city boundary.
Sources: Office of Superintendent of Public Instruction, 2022; BERK, 2022.

Burien's Incorporation and Annexations: Upon incorporation in 1993, Burien adopted interim zoning that was based on King County zoning. In 1997 the City adopted its first Comprehensive Plan. Burien became a city to have "a stronger voice and representation in matters concerning the expansion of Sea-Tac International Airport." (City of Burien 2018)

In 1998 and 2010, the City added neighborhoods including:

- 1998: 2,500 persons, added to the southeast in the Manhattan area (City of Burien 2018)
- 2010: 14,000 persons, North Highline area (City of Burien 2018) (City of Burien 2020)

There are patterns of home rental and ownership that persist from the platting and settlement of Burien today. In remaining sub-sections, this chapter covers:

- Racially Restrictive Covenants
- Settlement and Tribal Displacement

- Zoning History
- Populations in Single Family Zones

Racially Restrictive Covenants

Covenants on property are conditions that are recorded on property title and run with the land even if the property is sold; the covenants may restrict how a property is maintained, what can be built, and what uses may be limited. (Cornell Law School 2022) In the first half of the 20th Century, covenants were recorded in King County with racial, religious, or other discriminatory restrictions that applied to at least 20,000 properties, including about 1,800 lots in Burien. The covenants have not been legal to enforce since about 1948 per the Supreme Court of the United States, as well as a 1969 Washington State Law. (King County 2021)

The University of Washington's Seattle Civil Rights & Labor History Project identifies approximately 27 such covenants in Burien. Those with plat names are listed in Exhibit 9 and the identified covenants with locations are shown on the map in Exhibit 10. Many covenants apply to full subdivisions with hundreds of lots. The language in these covenants either restrict any non-White residents or name specific groups to exclude. In Burien, many specifically name those of "Ethiopian, Malay, or any Asiatic race" while others expand their reach to any immigrant ("alien").[6] The dates of these covenants are primarily in the 1920s, 1930s, and 1940s. (Seattle Civil Rights & Labor History Project, University of Washington 2020)

As described above, the enforcement of these covenants has been illegal since the late 1940s. The covenants can be removed by bringing an action in Superior Court for $20. A covenant modification can also be filed with King County. (King County 2021)

Exhibit 9: Race-Based Covenants in Burien

Neighborhood	Subdivision (Plat)	Racial Restriction	Parcels Covered
Beverly Park	Fredrick Addition	No lot shall be sold to or occupied by any person other than of the Caucasian race except in the capacity of servant.	25
Boulevard Park	Glenaire	"No property in said addition shall at any time be sold conveyed rented or leased in whole or 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 or building theron except a domestic servant actually employed by a person of the White of Caucasian race where the latter is an occupant of such property."	50
Boulevard Park	Hughes Beverly Park	"No persons of any race other than the Caucasian race shall use or occupy any dwelling or building or any lot except that this covenant shall not prevent occupancy by domestic servants of a different race domicilied with an owner or tenant."	14

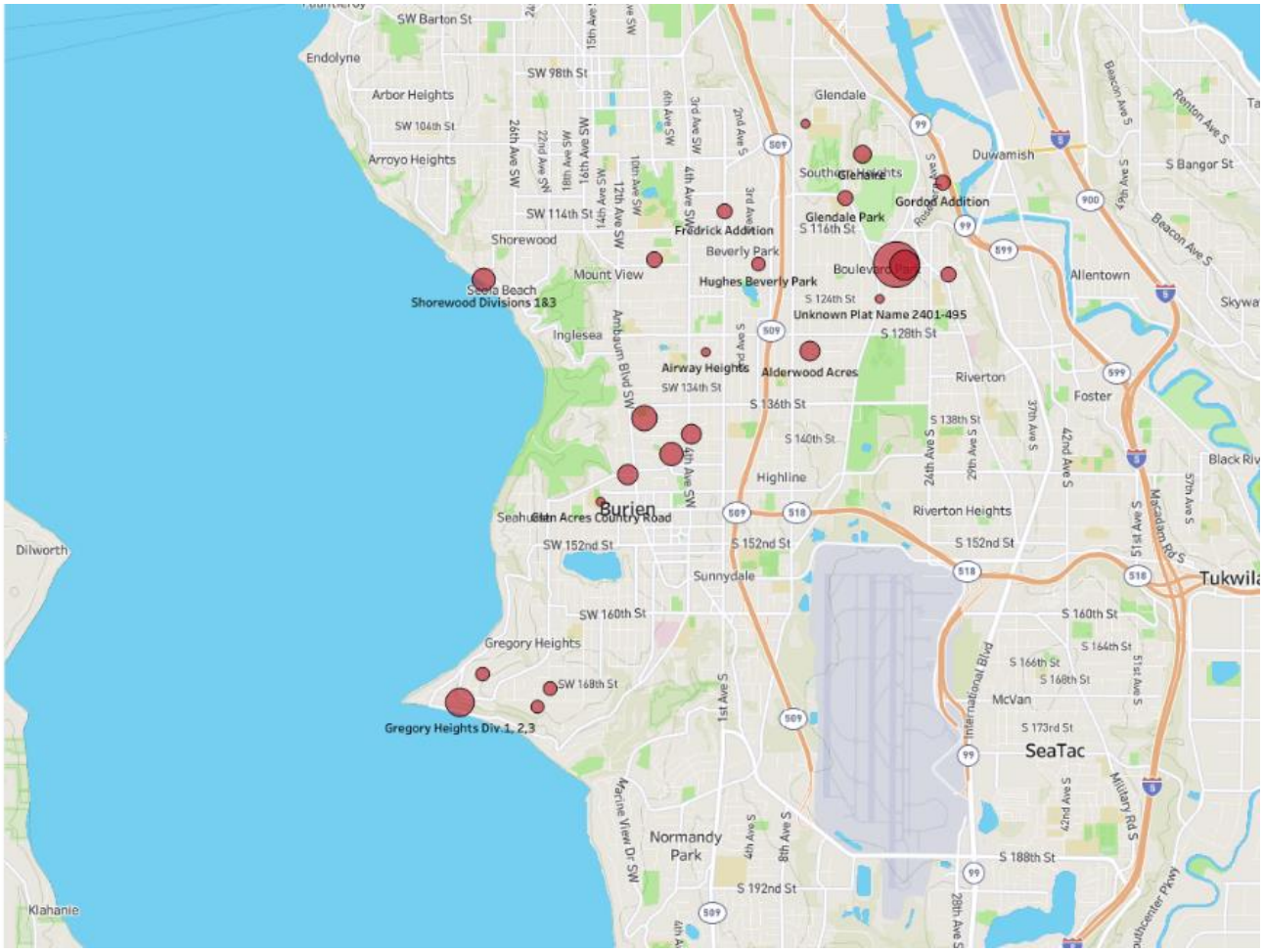
[6] In terminology from this time period, "Ethiopians" meant African ancestry; "Malays" meant Filipinos; and "Asiatic" meant anyone from the Asian continent. https://depts.washington.edu/civilr/covenants_report.htm

Neighborhood	Subdivision (Plat)	Racial Restriction	Parcels Covered
Boulevard Park	Kensington Heights	That only a private dwelling costing not less than $1,250.00 may be erected on the within described land. That said land shall not be leased, sold, or conveyed, used or occupied to anyone except a person of the Caucasian race.	155
Burien	Jones View Tracts	No property covered by this declaration shall be sold, transferred, assigned, leased, rented or occupied by any person not of the Caucasian race, provided however that any owner or occupier may keep upon said property not to exceed two servants who are not of the Caucasian race.	13
City Center	Glen Acres Country Road	It is a condition of this sale that above described property shall be used for residential purposes only and cannot be resold to aliens, disorderly persons, or persons not of the Caucasian race.	?
Duwamish	Gordon Addition	No race or nationality other than white or Caucasian shall use or occupy any building on any lot, except that this covenant shall not prevent occupancy by domestic servants of a different race or nationality employed by an owner or tenant.	24
Duwamish	Gordon's Addition #2	No person of any race other than the white race shall use or occupy any building or any lot, except this covenant shall not prevent occupancy by domestic servants of a different race domiciled with an owner or tenant.	13
Evansville	Airway Heights	No part of said property shall ever be used or occupied by any person of the Ethiopian, Malay, or any Asiatic race, and the granted, their heirs, personal representatives or assigns, shall never place any such person in the possession or occupancy of said property, or any part thereof, not permit the said property or any part thereof, ever to be used or occupied by any such persons excepting only employees in the domestic service on the premises of persons qualified hereunder as occupants and users and residing on the premises.	82
Evansville	Leonard Addition	Said premises shall not be sold to, leased to, or occupied by any person other than of the White or Caucasian race, except that this covenant shall not prevent occupancy by domestic servants of a different race or nationality actually employed in good faith by the owner or tenant.	28
Gregory Heights	Gregory Heights Div.1,2,3	Said property shall not be owned, leased to, mortgaged to , used or occupied as a residence by any person not of the white race.	222
Gregory Heights	Gregory Heights Park	Said premises shall not be sold to, leased to, or occupied by any person other than of the White or Caucasian race, except that this covenant shall not prevent occupancy by domestic servants of a different race or nationality actually employed in good faith by the owner or tenant.	11
Gregory Heights	Leonard's Gregory Heights Division	Said premises shall not be sold to, leased to, or occupied by any person other than of the White or Caucasian race, except that this covenant shall not prevent occupancy by domestic servants of a different race or nationality actually employed in good faith by the owner or tenant.	15
Highline	Alderwood Acres	No part of said property shall ever be used or occupied by any person of the Ethiopian, Malay, or any Asiatic race, except that this covenant shall not prevent occupancy by domestic servants of any of the above races who may be employees by an owner or tenant.	64
near Beverly Park	Glendale Country Estates	No part of said property shall ever be used or occupied by any person of the Ethiopian, Malay, or any Asiatic race, and the granted, their heirs, personal representatives or assigns, shall never place any such person in the possession or occupancy of said property, or any part thereof, nor permit the said property, or any part thereof, ever to be used or occupied by any person excepting only employees in the domestic service on the premises of persons qualified hereunder as occupants and users and residing on the premises.	?

Neighborhood	Subdivision (Plat)	Racial Restriction	Parcels Covered
near Beverly Park	Glendale Park	No person of any race other than the white race shall use or occupy any building or any lot, except this covenant shall not prevent occupancy by domestic servants of a different race domiciled with an owner or tenant.	20
Seahurst	Linde and Hill Park Div.2,3	"No person of any race other than the white race shall use or occupy any building or any lot, exempt that this covenant shall not prevent occupancy by domestic servants of a different race domiciled with an owner ot tenant."	198
Seahurst	Linde Terrace #4	No person of any race other than the white race shall use or occupy any building or any lot, except this covenant shall not prevent occupancy by domestic servants of a different race domiciled with an owner or tenant.	158
Shorewood on the Sound	Shorewood Divs 1&3/ Shoremont Div 2	All of said subdivision shall be occupied, leased or rented by only the white of Caucasian race, except domestic servants of a different race are not prohibited when domiciled with an owner or tenant.	452
Southern Heights	Mabell's 2nd Addition	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.	33
Southern Heights	sec. 8, township 23, range 4	No part of said property shall ever be used or occupied by any person of the Ethiopian, Malay, or any Asiatic race, and the granted, their heirs, personal representatives or assigns, shall never place any such person in the possession or occupancy of said property, or part thereof, nor permit the said property, or any part thereof ever to be used or occupied by any such person, excepting only employees in the domestic service on the premises of persons qualified hereunder as occupants and users and residing on the premises.	?
Southern Heights	Stimson Park Div. #1	No part of said property shall ever be used or occupied by any person of the Ethiopian, Malay, or any Asiatic race, and the granted, their heirs, personal representatives or assigns, shall never place any such person in the possession or occupancy of said property, or any part thereof, nor permit the said property, or any part thereof, ever to be used or occupied by any such persons excepting only employees in the domestic service on the premises of persons qualified hereunder as occupants and users and residing on the premises.	210
Southern Heights	Stimson Park Div. #2 (unrecorded)	No part of said property shall ever be used or occupied by any person of the Ethiopian, Malay, or any Asiatic race, and the grantee, his heirs, personal representatives, or assigns, shall never place any such person in the possession or occupancy of said property, or any part thereof, nor permit the said property, or any part thereof, ever to be used or occupied by any such persons excepting only employees in the domestic service on the premises of persons qualified hereunder as occupants and users and residing on the premises.	?

Source: University of Washington Seattle Civil Rights & Labor History Project, 2022.

Exhibit 10: Burien Map of Historic Race-Based Covenants.



Source: University of Washington Seattle Civil Rights & Labor History Project, 2022.

Settlement and Tribal Displacement

Per the 2020 US Census about 808 persons in Burien identify as American Indian / Alaska Native alone, and about 157 persons identified as multiracial including American Indian / Alaska Native. There are relatively lower rates of homeownership for persons identifying as American Indian / Alaska Native (see Chapter 3 Analysis of Racially Disparate Impacts, Exclusion, and Displacement).

Prior to White settlement, Burien was part of "winter towns inhabited by Lushootseed-speaking peoples, including the Duwamish, Suquamish, Muckleshoot, and Puyallup." (DeCoster 2013) The Treaties of Point Elliot and Medicine Creek in 1854 established reservations of land for signatory tribes with the ability to continue fishing, hunting and gathering off-reservations. Chief Seattle signed for the Duwamish and Suquamish tribes. (The Muckleshoot Indian Tribe 2023)

The Muckleshoot Indian Tribe is a federally recognized tribe that are descendants of the Native people who inhabited the Duwamish and Upper Puyallup watersheds. The Tribe identifies its geographic area of interest to includes all Watershed Resource Inventory Areas 8, 9 and 10, which

are the Lake Washington, Green-Duwamish & White-Puyallup River Basins. (The Muckleshoot Indian Tribe 2020) This includes the entirety of Burien which is in the WRIA 9 basin.

Tribal members moved from their original homelands to the reservations, and White settlers took over non-reservation lands:

> *Following the establishment of the Muckleshoot Reservation in 1857, and as pressure from settlers increased, Indian people moved from their traditional villages throughout the Duwamish/Lake Washington and Upper Puyallup drainages to the Muckleshoot Reservation. (The Muckleshoot Indian Tribe 2023)*

The Duwamish Tribe is seeking federal recognition. It considers its aboriginal territory to include Seattle, Burien, Tukwila, Renton, and Redmond. It established the Duwamish Tribal Services, a registered non-profit organization in 1983. Other federally recognized tribes dispute the claim of federal recognition that the Duwamish seek. (Mapes 2022)

Not all Indians moved to the reservations; they faced loss of their lands and homes and discrimination. Those on the reservation too faced poverty and discrimination. Children were forcibly sent to boarding schools to assimilate and lose their language and culture. (Mapes 2022)

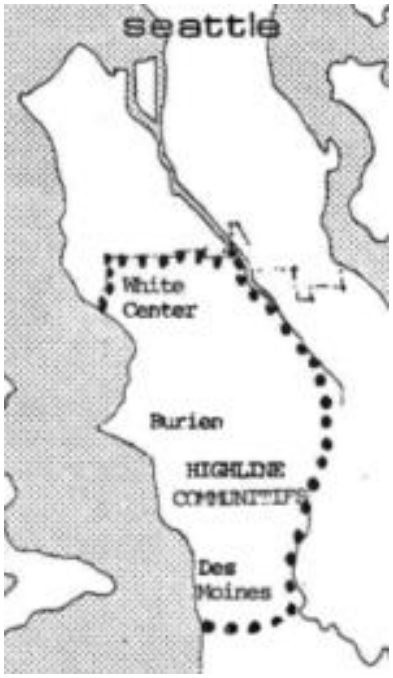
Another way tribal treaties were compromised is with environmental degradation. Some tribal members suggest that supporting the tribes' usual and accustomed places with properly functioning ecosystems is a way to honor the treaties. (Mapes 2022)

> *The treaty protects everyone living here today — and is why they live here not as visitors or squatters. Rather, Miller said, all people living here today are neighbors, bound together to uphold the treaty. Yet these are promises still not kept.*
>
> *Treaty tribes' rights were reserved forever to hunt, fish and gather where they always had, off the reservation. Lands and waters that today are paved, dammed, diked, dredged, filled and industrialized beyond recognition are increasingly bereft of salmon, game, roots, berries, plants and medicines central to Native cultures. (Mapes 2022)*

Zoning History

Burien was governed by King County for most of its development history. King County developed the Highline Community Plan (1977) and Area Zoning (1981) that applied to Burien as well as other unincorporated areas around the airport. See Exhibit 11.

Exhibit 11. King County Highline Community Plan Area



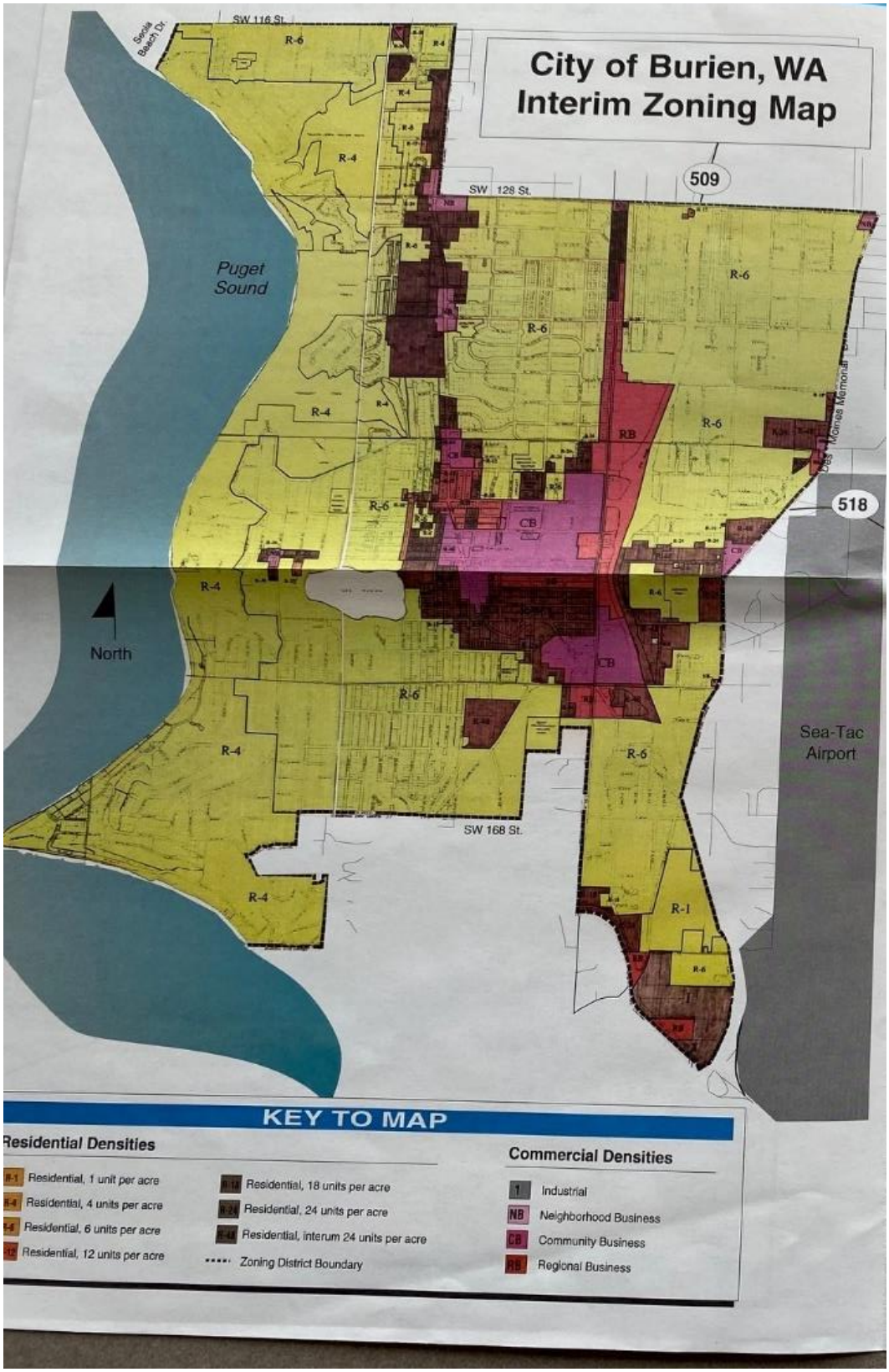
Source: (King County Planning Division 1977)

King County applied RS 7,200 zoning to most single family areas, and RS 9,600 to some lands on the west. (King County Planning Division 1981) When Burien incorporated in 1993, it adopted interim zoning with similar zoning districts as King County. See Exhibit 12. Burien developed its own Comprehensive Plan and revised zoning in 1997. See Exhibit 13. Burien's changes to residential zoning since 1997 have included:

- 1997/98: 5,000 square foot lots were applied RS 7,200 zoning with wider lot widths.
- 1997/98: RS 9,600 zones were rezoned to RS 12,000 in the west side of Burien.
- 1998: Burien developed a plan for Downtown Burien to redevelop into a more attractive, pedestrian and business friendly environment with public gathering spaces, mixed use development, and special public facilities.
- 1998: The Manhattan area to the southeast was annexed with RS 7,200 and other multifamily zoning.
- 2010: Burien rezoned some vacant, residential, and commercial properties to industrial in the Northeast Redevelopment Area.
- 2010: Burien annexed the North Highline area including Boulevard Park with RS 7,200 zoning and other multifamily and commercial zoning along Des Moines Memorial Drive.
- 2013: Via Ord. 614, properties along Lake Burien were rezoned from RS 7,200 to RS 12,000.

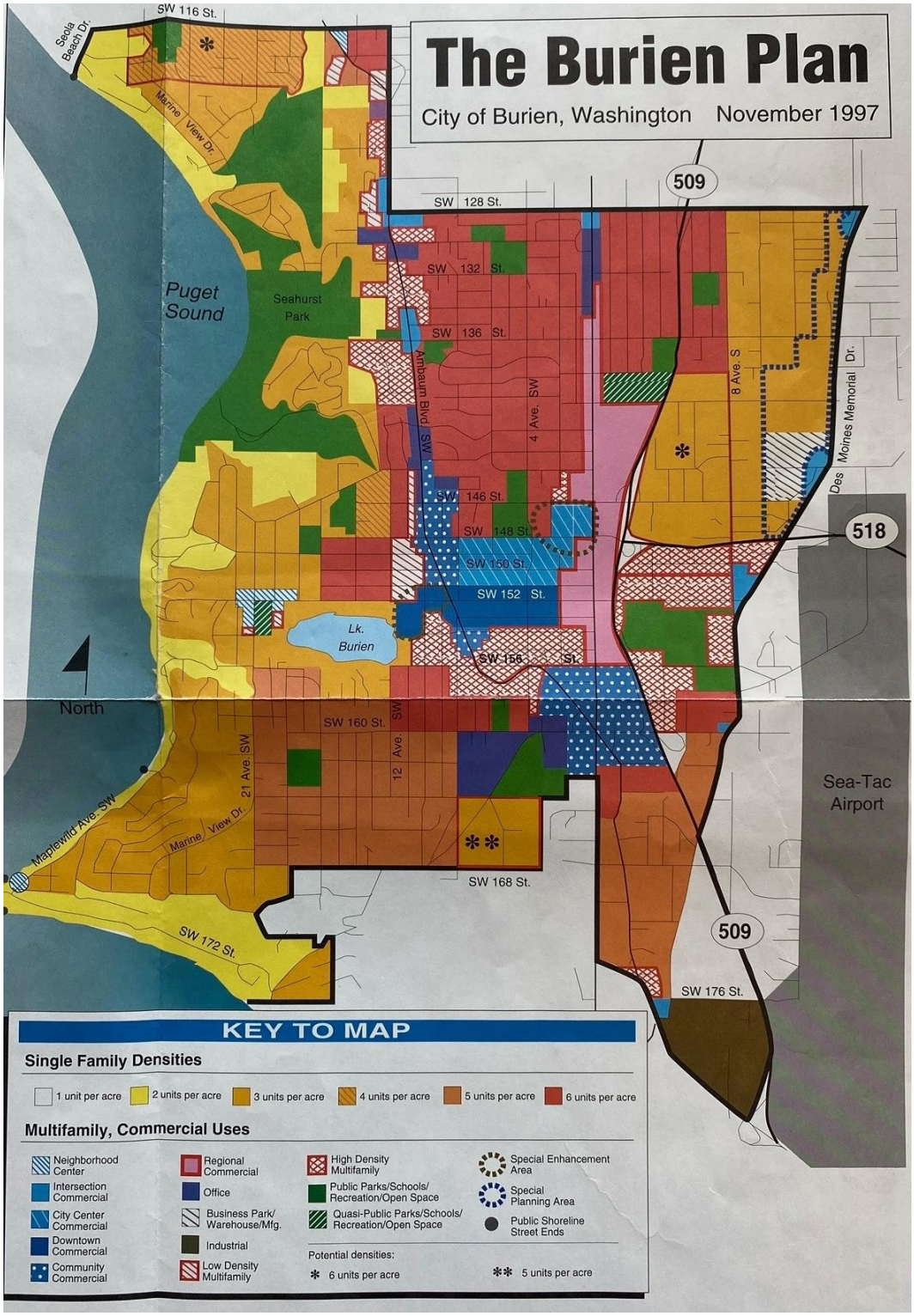
See Exhibit 14 for current zoning reflecting the changes.

Exhibit 12: Burien Interim Zoning 1993



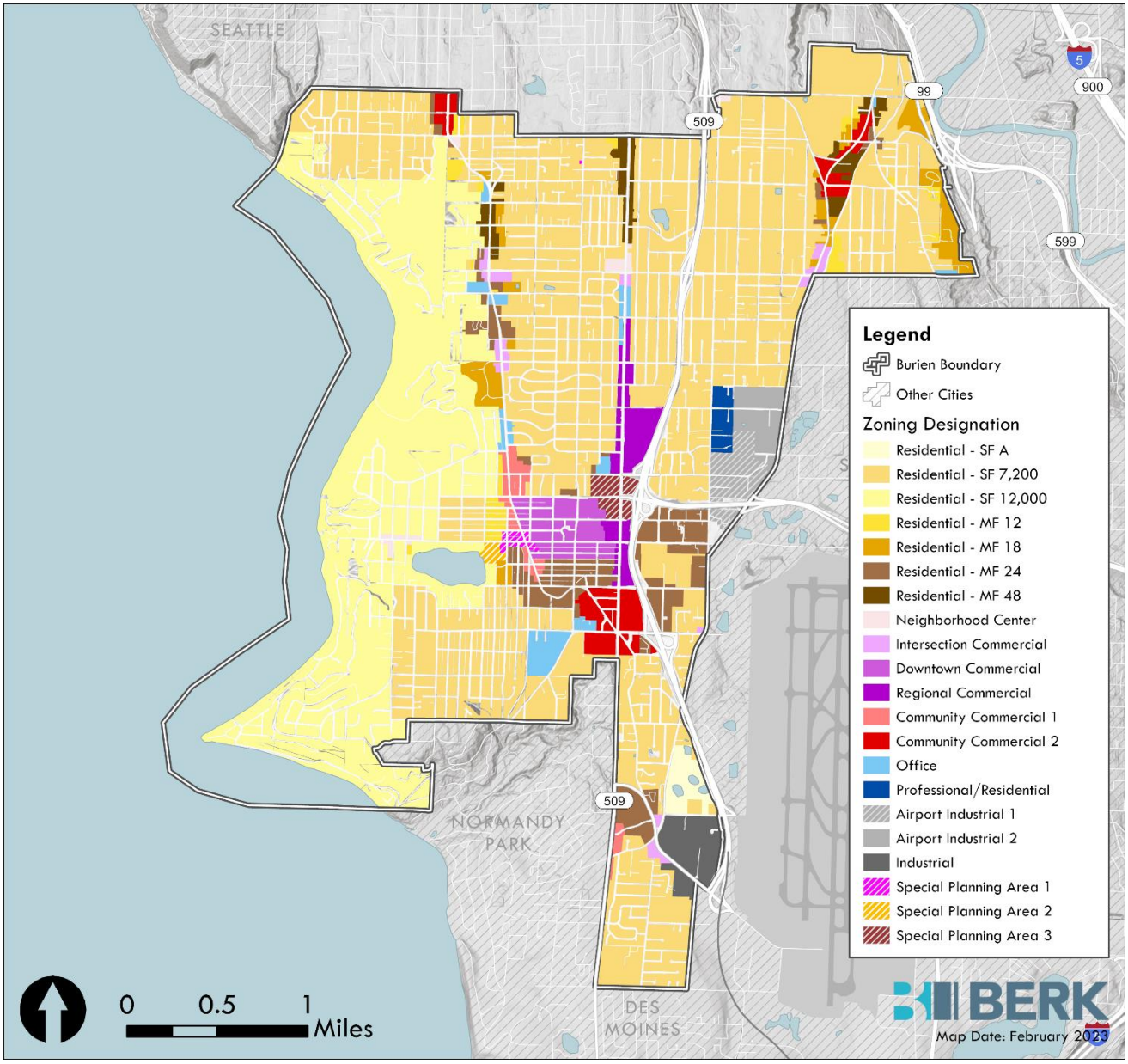
Source: City of Burien, 1997

Exhibit 13: Burien Plan November 1997



Source: City of Burien 1997

Exhibit 14: City of Burien Zoning 2019

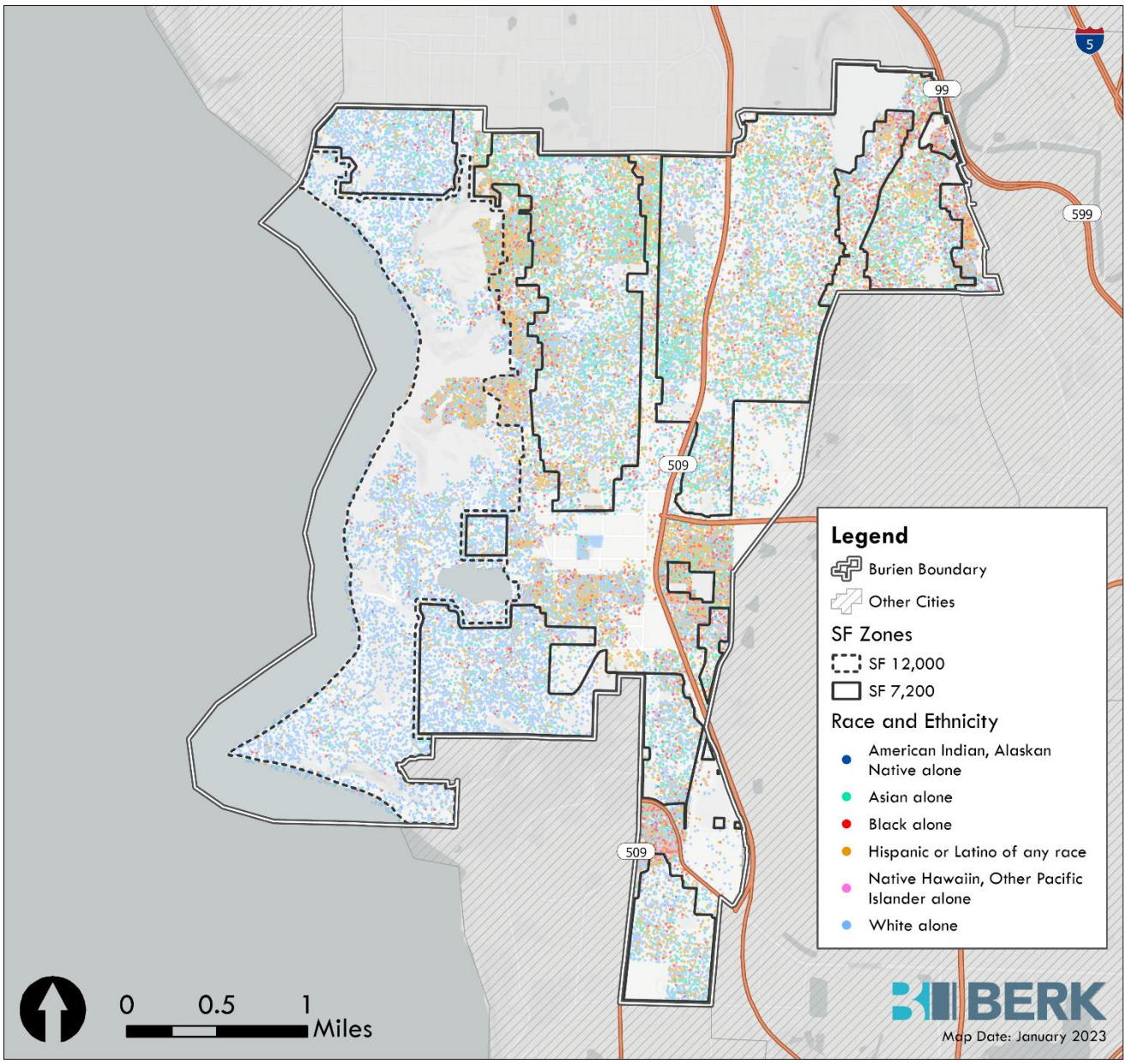


Source: City of Burien 2019

Populations in Single Family Zones

RS 7,200 zones tend to have more diverse populations in central and east Burien. Historic restrictive covenants do not appear to have had a continuing effect for non-White races in central and eastern Burien. RS 12,000 zones tend to have single family homes occupied by persons identifying as White on the west side of Burien. See Exhibit 15 and Exhibit 16.

Exhibit 15: Single Family Zoning and Race and Ethnicity



Sources: US Census Bureau 2020, City of Burien 2022, BERK 2023

Exhibit 16: Single Family RS 12,000 Zone and Race compared to City as a Whole (2020)

Race	Burien	SF 12,000 zone
White alone	45%	68%
Black alone	7%	4%
American Indian or Alaskan Native alone	1%	1%
Asian alone	14%	8%
Native Hawaiian or Other Pacific Islander alone	2%	1%
Other alone	1%	
Two or more	6%	
Hispanic or Latino of any race	24%	18%

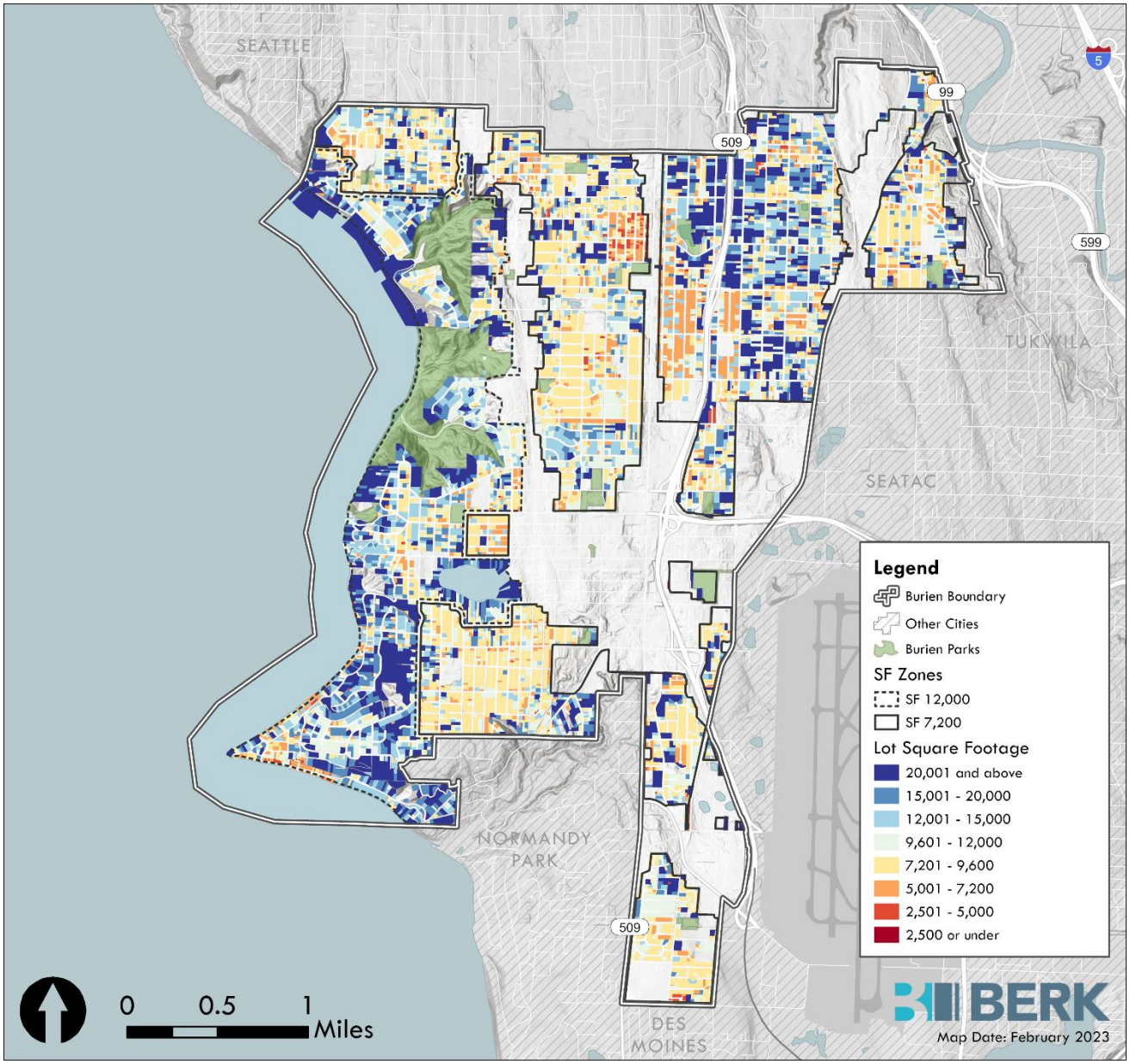
Source: US Census 2020, BERK 2023

Size and cost of dwellings with water views or frontage have likely contributed to lower housing affordability on the westside; historic downzones have limited housing opportunities for more households of any income or race.

Within the RS 12,000 zone there are lots smaller than 12,000 square feet especially near Salmon Creek Ravine and lands south of SW 144th Street. See Exhibit 17. There are also lots smaller than the RS 7,200 zone west and east of 1st Avenue north and south of S 128th Street. This would not prevent the development of a home on a legal lot, but it can inhibit added homesites (e.g., if a zone allowed smaller lots, it is possible more homes could be added).

Lots also exceed the zoning minimums in both zones. This may allow the City to consider different zoning options for greater housing variety and attainability across the city. See Exhibit 17.

Exhibit 17: RS 12,000 and RS 9,600 Zones and Lot Sizes



Sources: King County Assessor, City of Burien, BERK 2023

Current Conditions

Metropolitan Area Changes in Race and Poverty

Trends in the Seattle-Tacoma-Bellevue metropolitan area show an increase in the "suburbanization of poverty." Over the period 1990-2018 there was an increase in people experiencing poverty in the suburbs over central cities like Seattle. See Exhibit 18.

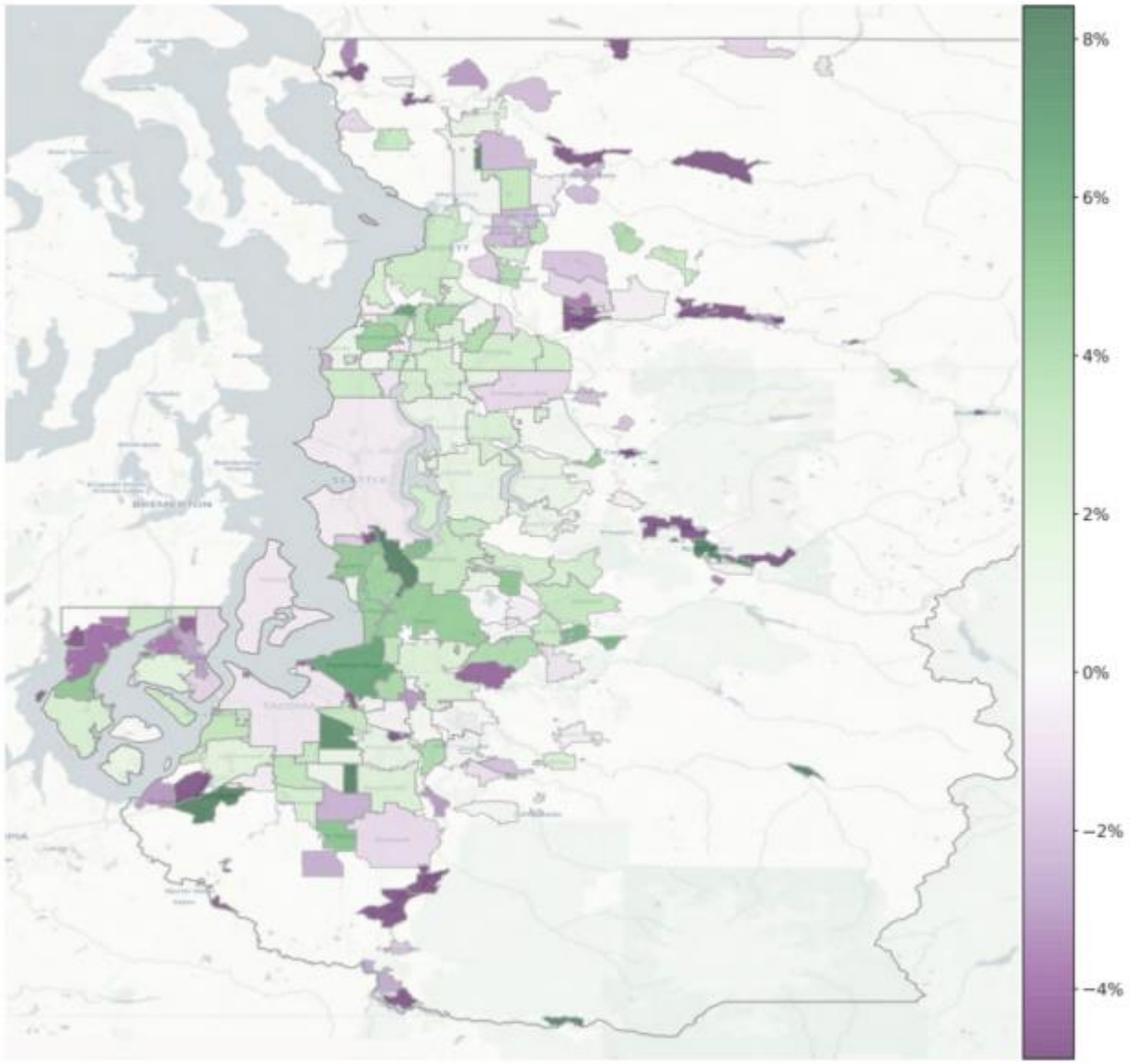
In the period 2014-2018 28% of the population experiencing poverty lived in large suburbs, 23% lived in the largest city of Seattle, 20% lived in unincorporated areas, and 17% lived in small suburbs. (Mattiuzzi 2022)

Burien, considered a large suburb, had an increase in poverty rates over the 1990-2018 period whereas Seattle had a drop. In Burien, there was an increase in poverty for Black, Hispanic, and Asian populations and a drop in poverty for White populations. (Mattiuzzi 2022)

South King County shows an increasing share of persons of color and poverty, likely reflecting exclusion from central Seattle and eastside suburbs due to cost of housing.

Exhibit 18: Change in Poverty Rate in Seattle Tacoma Bellevue Metro Area from 1990 to 2014–18

Change in Poverty Rate in Cities and Unincorporated Places in Seattle-Tacoma-Bellevue, Washington, Metro Area from 1990 to 2014–18



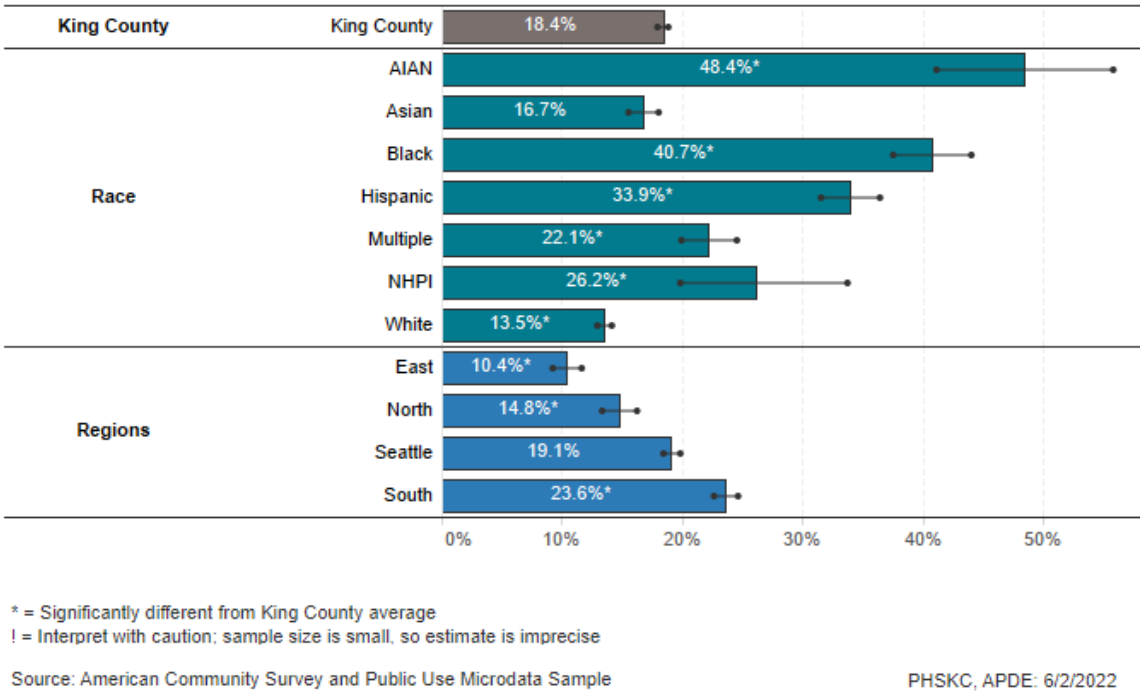
Source: IPUMS NHGIS, Brown LTDB, U.S. Census.

Source: (Mattiuzzi 2022)

County and City Trends

In King County, recent trends show that poverty is greater among non-White races and concentrated more in south King County.

Exhibit 19: Income Less than 200% of the Federal Poverty Level (Average 2016-2020)

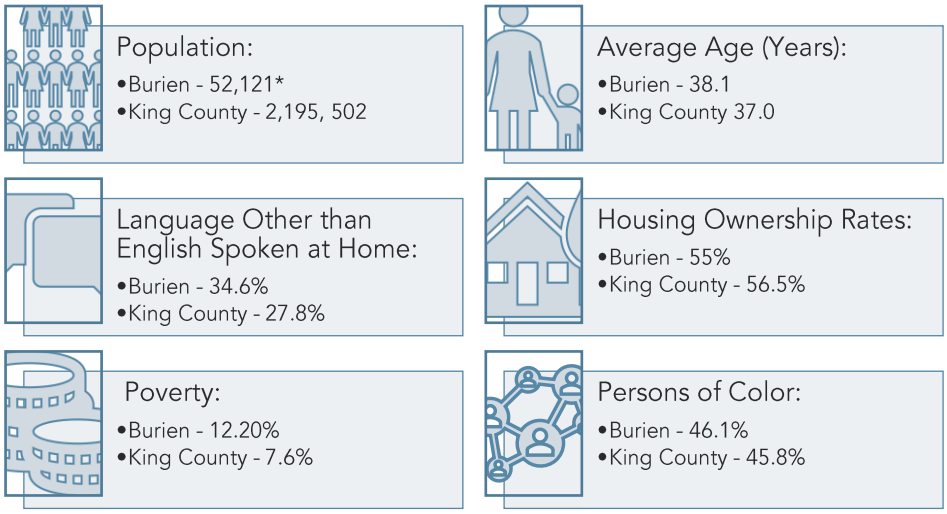


Source: (Communities Count 2021)

As of 2017, housing costs as a share of income shows households pay less of their income towards housing (less than 30%) in east King County than south King County.

Compared to the county as a whole, Burien is more diverse and has a higher rate of poverty.

Exhibit 20: Demographic Summary – City of Burien 2020



Reported in ACS as 52,121 whereas Decennial Census shows 52,066.

Communities of Interest in Burien

Burien has engaged its residents, social service providers, builders, and others around housing needs. The efforts have shown populations that may be underserved with housing. Communities of interest in Burien include:

- Black, indigenous, and persons of color (non-White races and ethnicities).
- Immigrant communities from Latin American, Asian, and African countries.

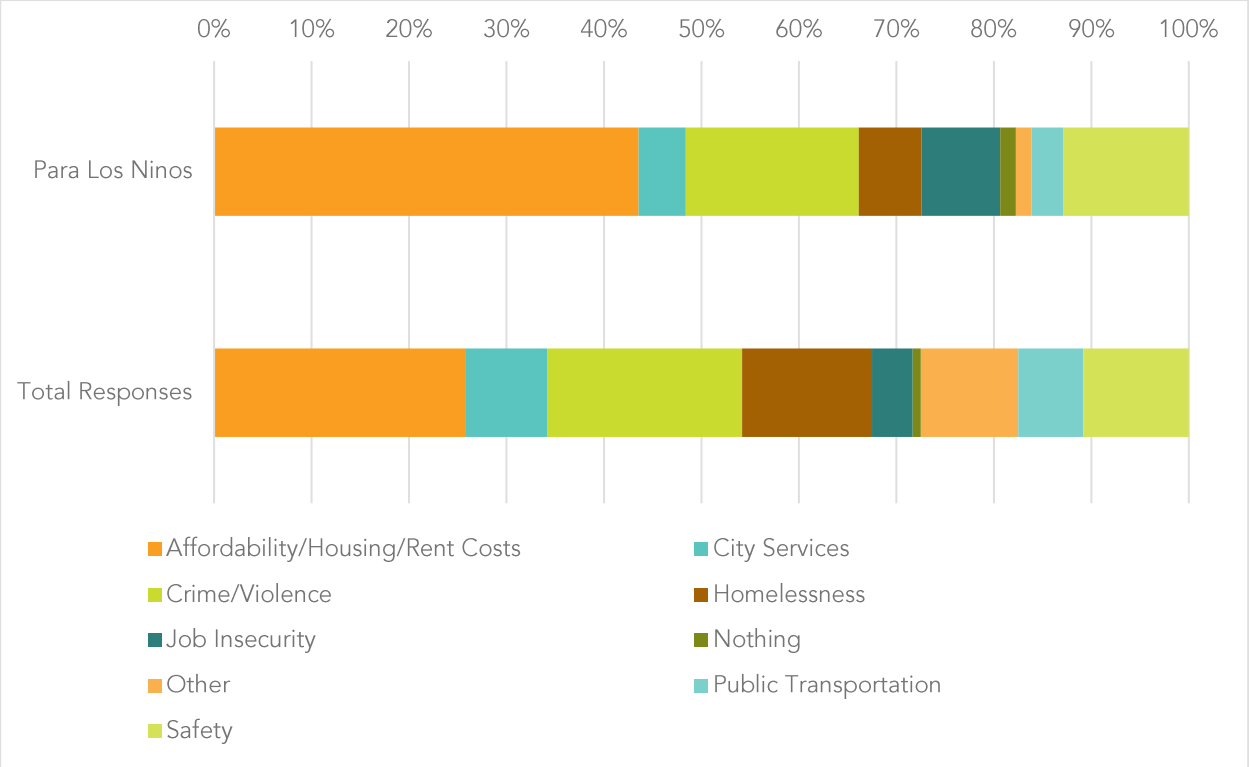
Housing Action Plan: The Housing Action Plan (2021) public engagement results identified underserved communities; relevant to displacement or exclusion of persons based on race and ethnicity:

- Immigrant and refugee communities are particularly vulnerable to housing impacts. Larger units for multigenerational households and working with faith-based communities were identified as important.
- Work in partnership with immigrant and refugee communities, as well as people of color, who are often reluctant to ask for repairs/upgrades because they feel vulnerable to landlord retaliation.
- Prioritize housing access and support services for families of color, immigrants and refugees who have children.
- Trans women of color face a high rate of unemployment, which is a direct connection to their lack of housing stability.
- Promote and enjoy the cultural and ethnic diversity of Burien by publicly celebrating important events, traditions, and holidays.
- Support opportunities and programs to create intergenerational wealth through homeownership, including classes in different/multiple languages.

Community Strategic Plan: The City's strategic planning process showed a range of priorities after an engagement process including Community Conversations, outreach by Para Los Ninos, and City Staff discussions in May-June 2022. Over 50% of responses were received by Para Los Ninos (62 of 120 persons). Respondents treasure Burien's quality of life, public amenities and services, and parks. They said affordability/housing/rent costs, crime/violence, and homelessness make it hard to live in Burien. Respondents associated with Para Los Ninos felt strongly that affordability/housing/rent costs were a large concern. Example comments included:

- *Cost of living is high and I'm a single mother.*
- *Mortgage and utility bills are high.*
- *Rent is very expensive. There are a lot of requirements to rent an apartment. There is a lot of delinquency.*
- *It's very difficult to find houses in Burien. It would be wonderful if we could find houses in this area so we don't have to move so far away.*
- *Cost of living is high - rent, electric, gas etc. It's difficult to find work for migrants. There aren't afterschool programs that are at a lower price …*

Exhibit 21: What is one thing that makes it hard to live here? What do you wish could be different?



Source: City of Burien, 2022; BERK 2023.

Highline School District. Over 50 languages are spoken in the Highline School District. Student homelessness is relatively higher in the Highline School District as well as Seattle and Tukwila, neighboring districts. (Communities Count 2021) The Highline School District provides housing questionnaires in English, Spanish, Vietnamese, Cambodian, and Somali. Students have the right to continue at the school they attended before they became homeless, can be provided transportation to/from their school of origin, be provided free school meals, and get help with school fees, as well as receive additional academic support and be connected to social service agencies. (Highline Public Schools n.d.)

Burien Human Services. Burien's Human Services funding allocations are based on priorities of supporting affordable and homeless housing, childhood/youth programs, health and wellbeing, safety, and careers offering living wages. Housing and homelessness programs supported in 2021-2022 include: (City of Burien n.d.)

- Catholic Community Services of King County, Emergency Assistance Program
- Hospitality House, Women's Homeless Shelter
- King County Bar Foundation, Pro Bono legal Services – eviction prevention
- Mary's Place, Family Shelter
- Multiservice Center, Emergency Assistance and Resource Navigation Services (EARNS)
- Multiservice Center, Shelter & Transitional Housing

- Sound, Project for the Assistance of Transition from Homelessness (PATH)
- St Vincent de Paul - St Bernadette Conference, St. Bernadette/St. Francis Eviction Prevention

CBO Engagement 2023: Pending, Spring 2023.

Desired Housing Outcomes

Burien's Housing Action Plan (City of Burien 2021), identifies the following housing desired outcomes:
A. Increase affordable housing and prevent displacement.
B. Increase both market-rate and affordable housing production in Downtown Burien.
C. Support TOD and investments in transit corridors.
D. Increase housing options and housing choice (i.e., middle housing).

The Housing Action Plan includes four goals and 13 recommendations to achieve recommended these outcomes including:

- Goal A: Affordable Housing Preservation and Displacement Mitigation
  - Track Affordable Market Rate Units
  - Monitor Regulated Properties
  - Monitor Neighborhoods at Highest Risk for Displacement and Act with Caution when Proposing Land Use Changes
  - Provide More Tenant Support
  - Provide Homeowner Assistance
- Goal B: Support New Housing and Affordable Housing in Downtown Burien
  - Reduce Parking Requirements
  - Expand the 8-year and/or 12-year Multifamily Tax Exemption (MFTE) Program
  - Create Inclusionary Housing Program
  - Explore the Use of City-Owned Land for Affordable Housing
- Goal C: Support TOD and Investment in Transit Corridors
  - Modify Development Standards to Support TOD
  - Create MFTE Program in Future Transit Corridors
- Goal D: Increase Housing Options and Housing Choice
  - Allow Middle Housing Types in Single Dwelling Zones
  - Middle Housing Policy Amendment in Burien's Housing Element

Towards these goals, the City has developed a citywide rental housing inspection program to address quality housing and support positive landlord-tenant relationships.

The City has also been working on subarea plans to address transit-oriented development (TOD) along corridors in Ambaum and Boulevard Park neighborhoods. It has been reviewing Multifamily Tax Exemptions (MFTE) in these neighborhoods and Middle Housing opportunities.

As part of the citywide Comprehensive Plan, the City anticipates addressing the Urban Center code applying to Downtown and beyond. Also, this RDI report is part of considering how Burien can identify and remove barriers to housing for all races and incomes including Middle Housing on at least 30% of single family lots.

3 Analysis of Racially Disparate Impacts, Exclusion, and Displacement

This chapter presents an analysis of potential racially disparate impacts, exclusion, and displacement in Burien using both quantitative and qualitative information at a local, county, state, and national level to identify trends and issues of concern. The information is presented in several subsections, including:

- Measures used in Evaluation
- Racially Disparate Impacts
  - Income and Housing Costs
  - Homeownership Rates
  - Housing Choices and Well Being
  - Geographic Patterns
  - Fair Housing Complaints
- Exclusion
- Displacement
  - Expiring Affordable Housing Covenants
  - Displacement Risk Analysis
  - Eviction Risk
- Summary of Analysis / Findings

Measures Used in Evaluation

To identify potential impacts to persons of non-White races and immigration status in terms of disparate impacts, exclusion and displacement, several datapoints were collected per Exhibit 22.

Exhibit 22: Datapoints used in the Racially Disparate Impacts Analysis

Datapoint	Source	Details	Evaluation Section
Median Income	ACS 5-year, 2020	Disaggregated by race and ethnicity and mapped by Census tract	RDI: Income and Housing Costs
Average Rent	Zillow		RDI: Income and Housing Costs
Average Mortgage Payments	Zillow	Calculated based on Zillow median home prices for average homes and lower market homes	RDI: Income and Housing Costs
Housing tenure	ACS 5-year, 2020	Disaggregated by race and ethnicity	RDI: Homeownership Rates
Housing cost burden rates	CHAS 5-year 2015-2019	Disaggregated by race and ethnicity	RDI: Housing Choices and Well-Being
Rates of crowding	ACS 5-year, 2020	Disaggregated by race and ethnicity	RDI: Housing Choices and Well-Being
Distribution of environmental exposure risk	Washington Environmental Health Disparities Map, 2022	Disaggregated by race and ethnicity	RDI: Housing Choices and Well-Being
Commute time estimates	National Equity Atlas, based on ACS 2015-2019	Disaggregated by race and ethnicity	RDI: Housing Choices and Well-Being
Commute patterns by worker type	LEHD based on ACS 5-year 2015-2019	Disaggregated by income level and geographic location	RDI: Housing Choices and Well-Being
Population density	Census 2020	Disaggregated by race and ethnicity, mapped	RDI: Geographic Patterns
Household population change over time	ACS 5-year 2020, 2010, and 2000	Disaggregated by race and ethnicity	RDI: Geographic Patterns
Park access map	City of Burien	Include 10-minute walksheds	RDI: Geographic Patterns
Fair Housing Complaints (national/state)	Fair Housing Act Cases Filed By year and State (Data.gov)	Separated by reason for case being filed (race, national origin, color, religion, familial status, disability, sex, retaliation, etc.,), by year	RDI: Fair Housing Complaints
Subsidized housing locations	National Housing Preservation Database SKHHP		Displacement: Expiring Affordable Housing Covenants
Evictions count and rate	EvictionLab, 2016* EvictionStudy 2017 King County Bar Association, Evictions by Zip Code during Pandemic*	Mapped by Block Group* Mapped by Census tract Mapped by Zip Code*	Displacement: Eviction Risk
Displacement risk factors	Burien Housing Needs Assessment, 2021 Burien Displacement evaluation, Commerce recommended approach 2023	Burien Housing Needs Assessment: Mapped by Census tract with 2018 data. Puget Sound Regional Council, Commerce recommended: 2020-2021 data	Displacement: Displacement Risk Analysis

Sources: *Used in evaluation. See "Source" column. Compiled by BERK 2023.

Racially Disparate Impacts

Income and Housing Costs

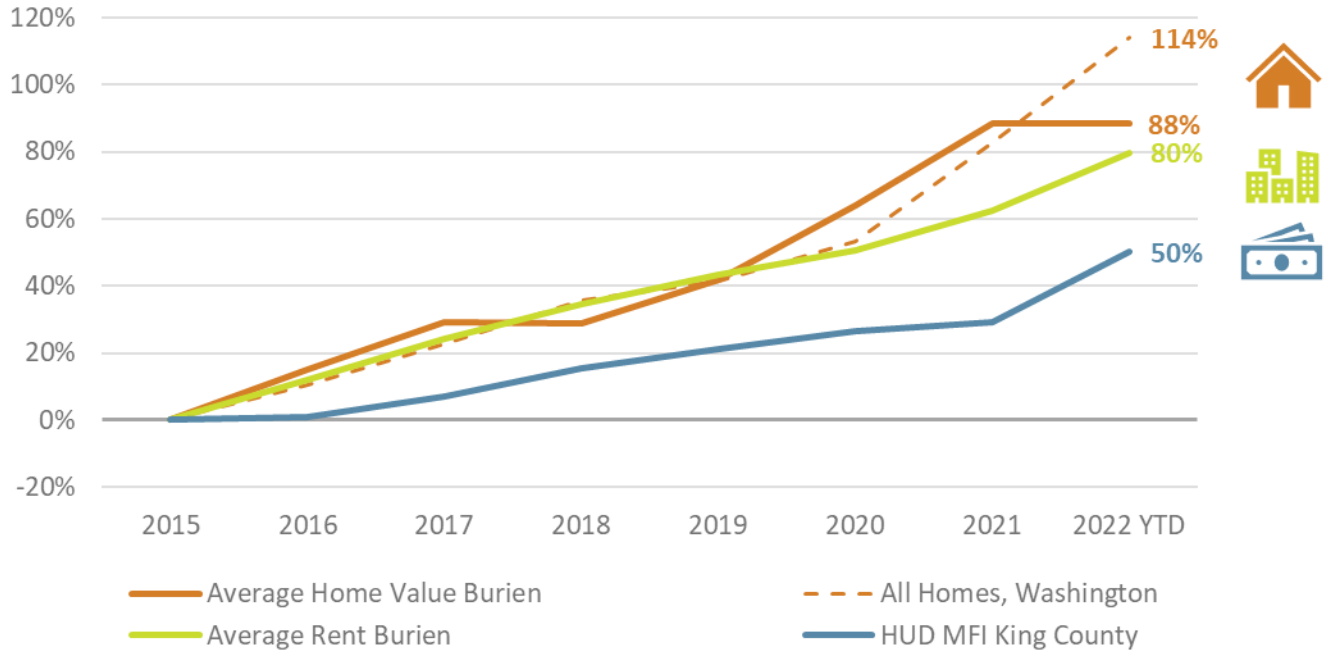
From 2015-2022, costs for ownership and rental housing in Burien have increased at much faster rates than area incomes (88% and 80% respective increases, compared to 50% for income). See Exhibit 23. This decline in housing affordability hits households and families in lower income brackets the hardest. In addition, recent spikes in lending and interest rates further increase the barrier to ownership for first-time homebuyers. In January of 2022, mortgage lending rates averaged around 3.3% and by November of the same year they more than doubled to 7%.[7] This increases the cost of home ownership beyond what is shown in home values. For example, a median home price of about $650,000 has an estimated monthly mortgage payment between $3,252 - $4,024 at 3.3% interest rates, but these payments increase by an average of 30% to $4,434 - $5,354 with 7% interest rates.[8] To afford the home at $650,000, with a 10% down payment, one would need an annual income of $215,000 dollars, or with a 20% downpayment, an income of $178,000.

This exceeds the median income of both Burien and King County:

- Burien Median Income
  - 2020 Inflation Adjusted: $71,233 | 2021 Inflation Adjusted: $79,797
- King County Median Income
  - 2020 Inflation Adjusted: $110,586 | 2021 Inflation Adjusted: $106,326

[7] In fall 2022, interest rates were trending upwards. Since the start of 2023 mortgage rates are slightly easing below 6.25%. See: https://www.mortgagenewsdaily.com/mortgage-rates/30-year-fixed.
[8] Mortgage interest rates based on 30-year fixed mortgages. Ranges shown reflect variation between a 10% down payment (inclusive of added costs with PMI) and a 20% down payment.

Exhibit 23: Percent Change 2015-2022, Home Values, Rental Rates & HUD Area Median Family Income



Sources: Zillow, 2022; Sources: Zillow, 2022; HUD, 2022; BERK, 2022.

Average rents in Burien are affordable to those earning the median income. See Exhibit 24.

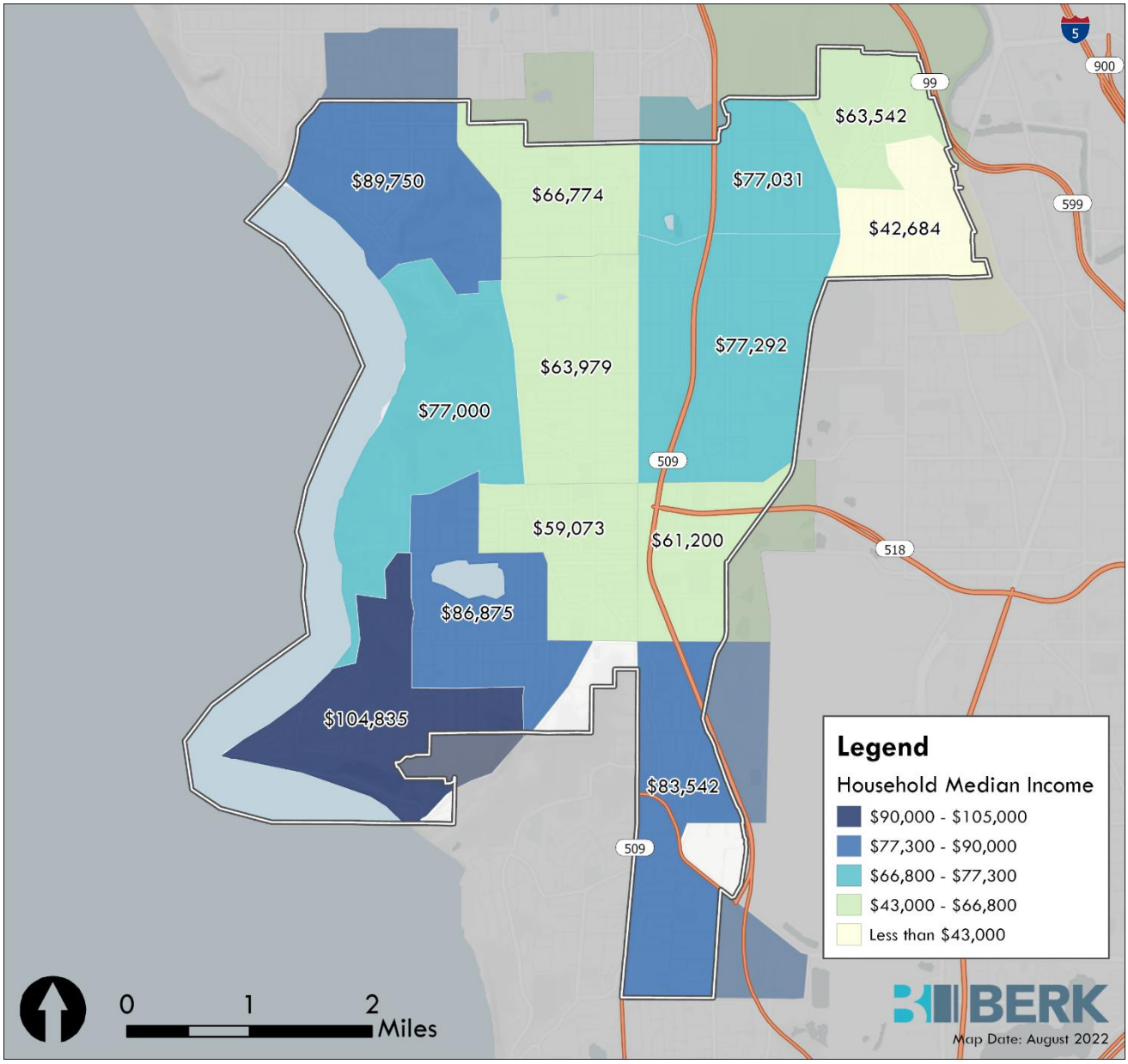
Exhibit 24: Affordable Rents in Burien

	2015	2020	2021	2022 (Oct)
Burien Average Rental Rates	$995	$1,499	$1,615	$1,788
Income Needed to Afford	$39,785	$59,942	$64,610	$71,509
Median Family Income (MFI)	$89,600	$113,300	$115,700	$134,600
Affordable Rent @ MFI	$2,240	$2,833	$2,893	$3,365
% MFI Can Afford	44%	53%	56%	53%

Sources: Zillow Rent Index All Units, Washington City, Downloaded 10/4/2022; HUD Median Family Income

Burien's western census tracts and those immediately east of SR 509 / north of SR 518 earn more than Burien's median income. Burien's central census tracts have households that tend to earn less than the Burien median income. See Exhibit 25.

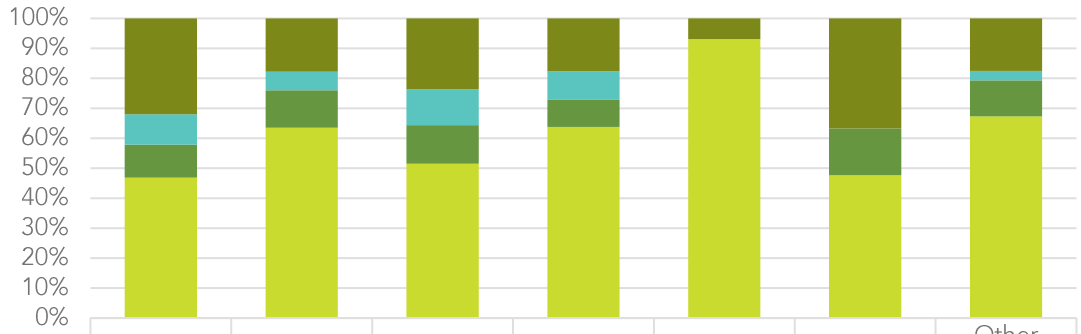
Exhibit 25: Median Household Income in Burien by Census Tract, 2020.



Sources: Census, 2020; BERK, 2020.

Most households of any race earn less than the amount needed to own a house. White households have more households earning incomes above the Burien median income and above the King County median income compared to non-White households. See Exhibit 26.

Exhibit 26: Race and 2020 Income (Inflation Adjusted): Share of Households by Income



	White	Hispanic	Asian	Black	AIAN	NHOPI	Other Alone
$125,000-200,000+	3,613	550	476	320	6	47	312
$100,000-124,999	1,146	191	240	173	0	0	57
$75,000-99,999	1,244	387	259	164	0	20	214
$10,000-74,999	5,298	1,963	1,036	1,157	81	61	1,200

Source: American Community Survey, S1901, 2020 5-Year Estimates
Legend: AIAN – American Indian and Alaskan Native, NHOPI – Native Hawaiian or Pacific Islander
Comparisons: Burien 2020 Inflation Adjusted Income: $71,233 | King County 2020 Inflation Adjusted Income: $110,586

The level of poverty is also greater for non-White races. See Exhibit 27.

Exhibit 27: Race and Hispanic or Latino Origin Percent Below Poverty Level

Race	Percent
Native Hawaiian and Other Pacific Islander alone	30.90%
American Indian and Alaska Native alone	27.40%
Some other race alone	18.20%
Hispanic or Latino origin (of any race)	17.80%
Black or African American alone	15.20%
Asian alone	12.00%
White alone, not Hispanic or Latino	8.30%

Source: American Community Survey, S1701, 2020 5-Year Estimates

Homeownership Rates

Homeownership bestows many benefits on households and communities. Homeownership is one of the most common strategies for wealth building in the United States. Homeowners benefit from favorable tax policies, such as the Home Mortgage Interest Deduction.[9] Additional advantages to homeownership include locking in stable monthly housing costs over time, capturing increases in land value, and reduced risk of displacement when housing costs increase. Lower vulnerability to

[9] https://www.hrblock.com/tax-center/filing/adjustments-and-deductions/home-mortgage-interest-deduction/

displacement leads to greater community stability and the benefits of stable social networks and cohesion. Historic and ongoing systemic discrimination contributes to racial disparities in homeownership. Home ownership requires substantial savings for a down payment, along with a credit history and income source that lenders deem acceptable. Many BIPOC households struggle with either or both of these criteria, restricting access to this wealth-building opportunity.[10]

Nationally, there is a wide gap in homeownership rates between White households and other racial groups. Progress to close this gap was documented in the early 2000s, but the shock of the financial crisis erased most of these gains. Community change, whether caused by natural hazards, economic shifts, or political movement, impacts residents in different and disproportionate ways. Populations with less access to political and economic power often bear the brunt of negative externalities from large system shocks. Research from the University of Michigan evaluates wealth loss from the 2008 recession and reports that:

> *"Everything else equal, whites and Asians were much less likely to have lost significant wealth than African Americans, Hispanics, Native Americans and others: 30 percent less likely to have lost any wealth, 37.5 percent less likely to have fallen into debt, and 74 percent less likely to have lost at least $250,000." -Wealth Disparities Before and After the Great Recession*[11]

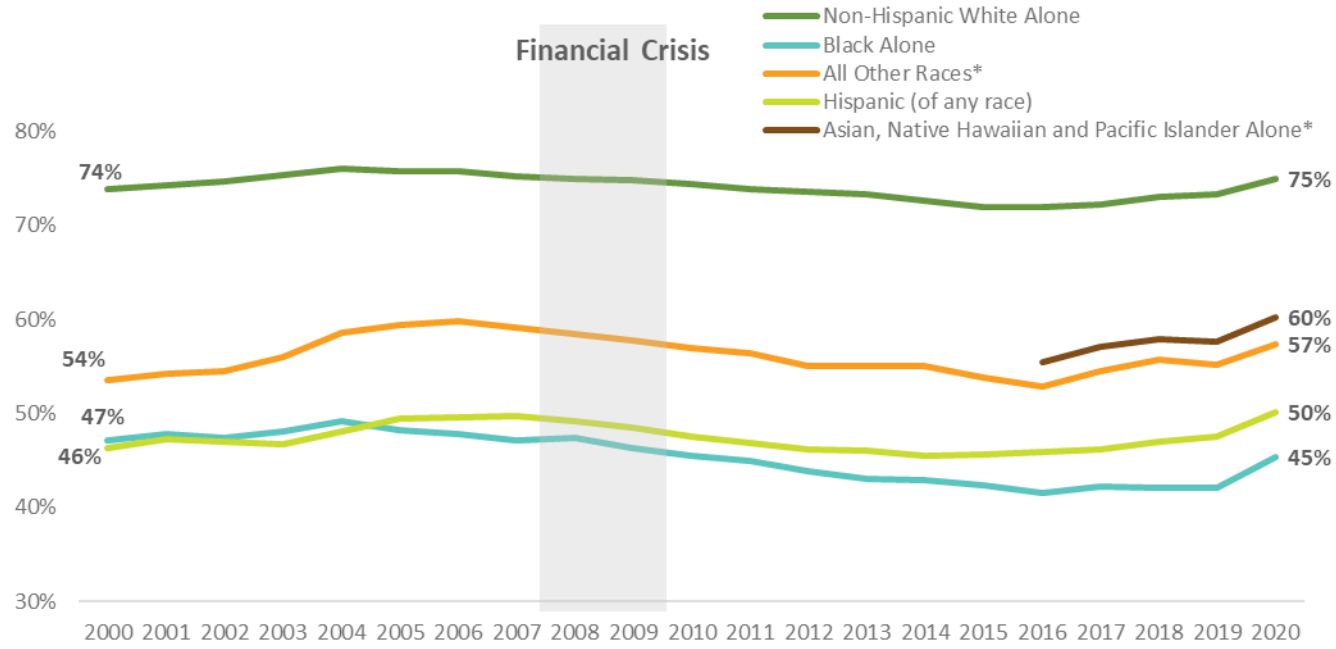
Community change, whether caused by natural hazards, economic shifts, or political movement, impacts residents in different and disproportionate ways. Populations with less access to political and economic power often bear the brunt of negative externalities from large system

Across the 2000-2020 time period, White households across the United States maintain home ownership rates around 75% while Black and Hispanic households have hovered at or below 50%. The Black home ownership rate in 2020 is 2% lower than it was 20 years prior. These patterns emphasize ongoing concern that disparities will worsen as impacts settle in from more recent system shocks related to the COVID-19 pandemic and rising inflation. United States home ownership trends for the past 20 years are summarized in Exhibit 28.

These national patterns of homeownership disparities by race are reflected in Burien's data as well. Overall, in Burien, a little over half (55%) of households live in ownership housing while 45% live in rental housing. White and Asian residents, however, are much more likely to be homeowners in Burien, with rates of 69% and 63% respectively. All other groups report much higher rates of living in rental housing: 31% and below. Comparing 2020 homeownership rates with 2010, gaps in racial disparities have widened. While White and Asian households have experienced gains in homeownership, other groups have remained stagnant or decreased in ownership rates. See Exhibit 29.

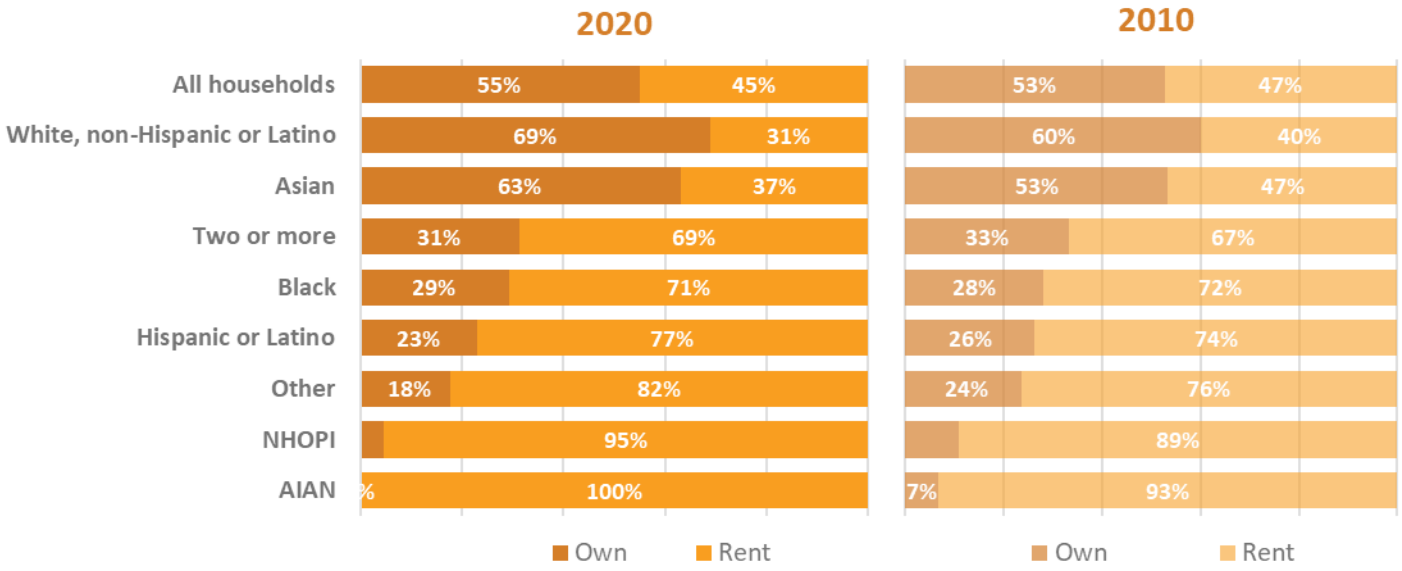
[10] Brookings, 2019; Urban Institute, 2018; Harvard Joint Studies for Housing Research, 2013; Center for Investigative Reporting, 2018
[11] https://www.inequalitydynamics.umich.edu/wp-content/uploads/2020/02/PfefferDanzigerSchoeni2013.pdf

Exhibit 28: Homeownership Rates by Race and Ethnicity of Householder, United States 2000-2020.



*"All Other Races" includes people who reported Asian, Native Hawaiian or Other Pacific Islander, or American Indian or Alaska Native regardless of whether they reported any other race, as well as all other combinations of two or more races until 2016. In 2016, homeownership rates for Asian, Native Hawaiian and Other Pacific Islander households were tabulated separately from the "All Other Races" category.
Sources: U.S. Census Bureau, Current Population Survey/Housing Vacancy Survey, 2022; BERK, 2022.

Exhibit 29: Homeownership Rates in Burien, by Race and Ethnicity, 2010 & 2020.



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.
Sources: American Community Survey 2020 5-year estimates, Table B25003A-I; BERK 2022.

Housing Choices and Well-Being

Housing decisions are made with the consideration of many factors: cost; space; quality; proximity to jobs, parks, schools, social networks, and businesses; and exposure to environmental hazards, to name some of the major categories. Households and families facing financial pressures and experiencing cost burden will make difficult tradeoffs between these competing priorities that impact overall well-being. This could include sacrificing healthcare needs to afford housing or accepting substandard housing conditions to bolster budgets for groceries and education.

Cost Burden: Whether renter or owner, more than half of BIPOC households are cost-burdened and one third of White households are cost-burdened. Some are severely burdened spending 50% or more of their income on housing.

Exhibit 30: Cost-Burden -Owner and Renter

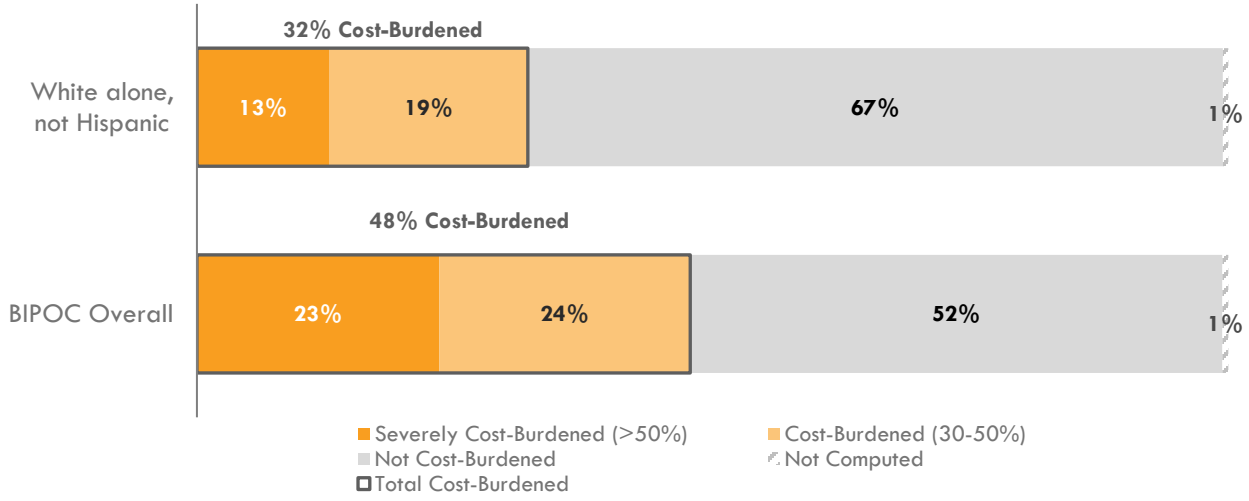
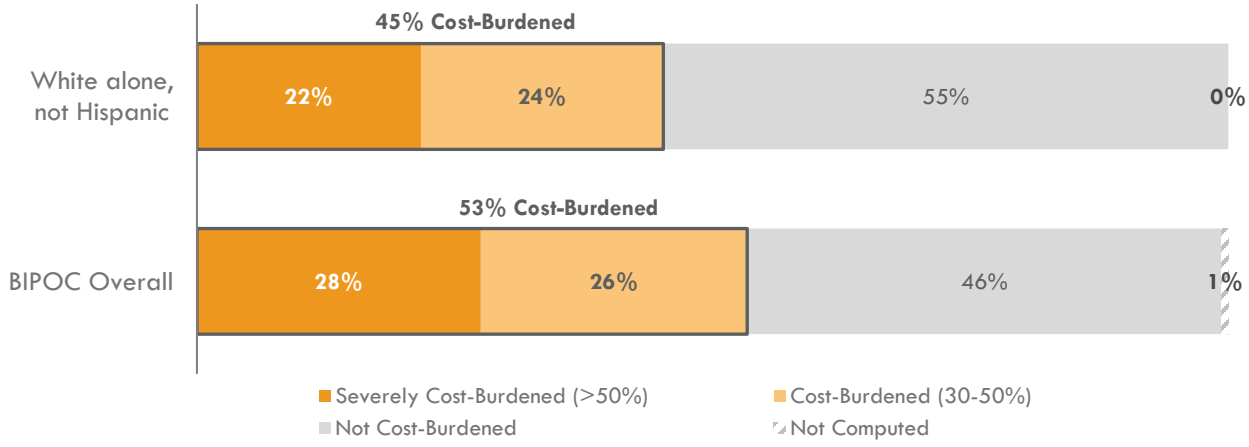


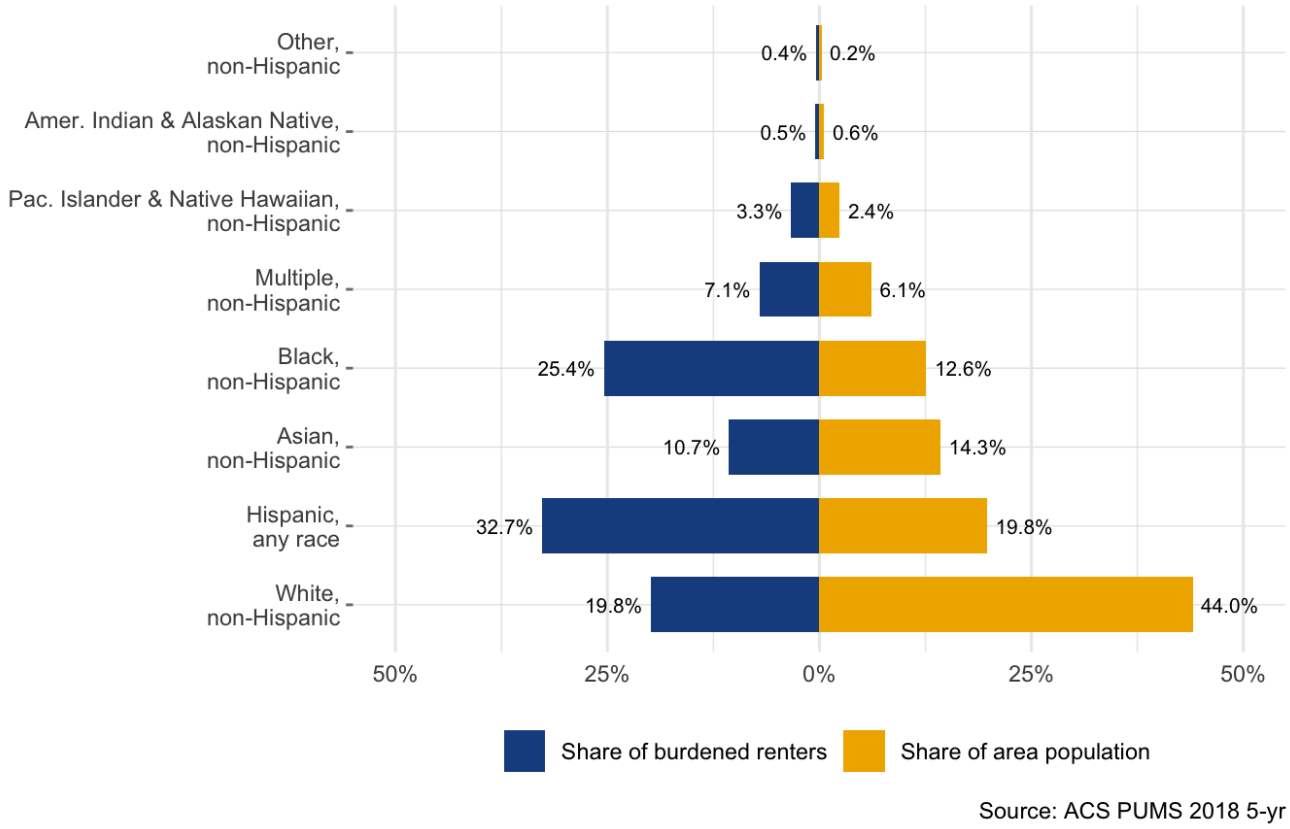
Exhibit 31: Cost Burden- Renter



Source: HUD CHAS (based on ACS 2014-2018 5-year estimates); AMI = HUD Area Median Family Income; BERK 2023

Housing cost burden is greater for BIPOC populations relative to their share of populations, than for White populations. See Exhibit 32.

Exhibit 32: Rates of Housing Cost Burden, by Race and Ethnicity in Burien; 2018



Source: ACS PUMS, Burien Area, ECONorthwest 2021.

***Housing Action Plan, 2021:* In the Burien area, households of color account for a disproportionate amount of households experiencing cost burdening, compared to their share of total populations.**
Hispanic households of any race account for almost 33 percent of all the households experiencing cost burdening, yet they only account for 20 percent of total Burien-area households.
Non-Hispanic Black and African American households account for 25 percent of all cost burdened households despite accounting for less than 13 percent of total households. Black households are disproportionately cost burdened. (2018 ACS Data)

Overcrowding: Overcrowding of residents to the size of the unit may reflect financial pressures. It may also reflect multigenerational living. Overcrowding has increased between 2015 and 2020 for BIPOC households and has decreased for White households. See Exhibit 33.

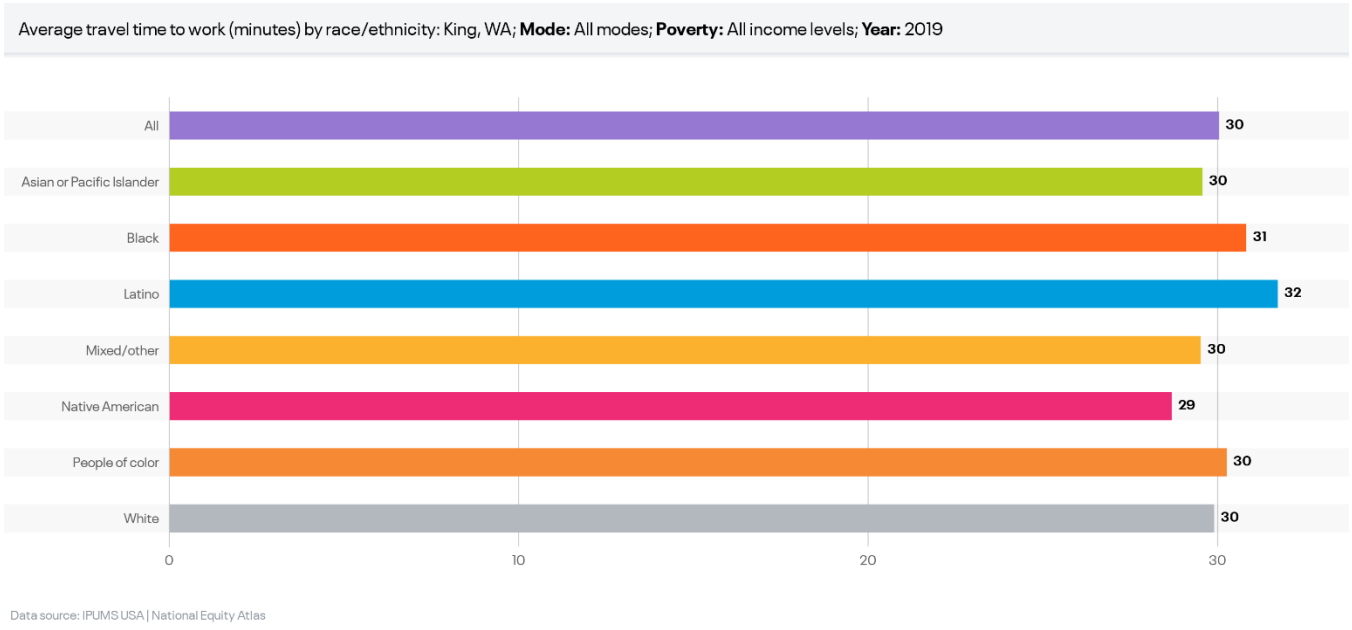
Exhibit 33: Rates of Overcrowding by Race and Ethnicity (2020 and 2015)

	2020 Count	2020 Percent	2015 Count	2015 Percent
All Households	19,235	6.8%	18,273	6.0%
White Alone, Non-Hispanic	11,301	1.0%	11,520	2.1%
Two or More Alone	1,272	5.7%	922	3.0%
Black Alone	1,814	13.8%	1,261	2.0%
Asian Alone	2,011	14.4%	1,411	13.5%
Hispanic, Any Race	3,091	17.9%	1,261	17.1%
Other*	1,998	19.5%	1,312	16.1%

Notes: Crowding implies more than one person per room of the house. This includes all rooms other than bathrooms, so a 1-bedroom apartment with an open concept living room/kitchen would be considered crowded with more than 2 residents.
*Other, in this summary, incorporates those who identified as American Indian and Alaska Native Alone, Native Hawaiian and other Pacific Islander Alone, or Other Alone to account for high margins of error with smaller group sizes.
Sources: ACS 5-year Estimates B25014, 2020; BERK, 2022.

Commuting: Commuting time data is available by race at a County level for the year 2019. Information shows that at all income levels, the commute time is similar among all races and slightly longer for Black and Latino commuters. Commuting times for Burien residents are not available by race. Burien's mean travel time for the 5-year period 2017-2021 is 29.4 minutes whereas for King County as a whole it is 28.1 minutes.

Exhibit 34: Average Travel Time to Work (Minutes) by Race/Ethnicity: King, WA



Source: (National Equity Atlas 2019)

Means of commute patterns are presented in Exhibit 35. Most workers drive alone compared to carpooling or taking public transportation. White workers make up a large share of all modes of transport. BIPOC and foreign born populations, particularly those who speak English less than very well, have higher rates of carpooling than driving alone. BIPOC populations, particularly Black residents, are more likely to take Public Transportation.

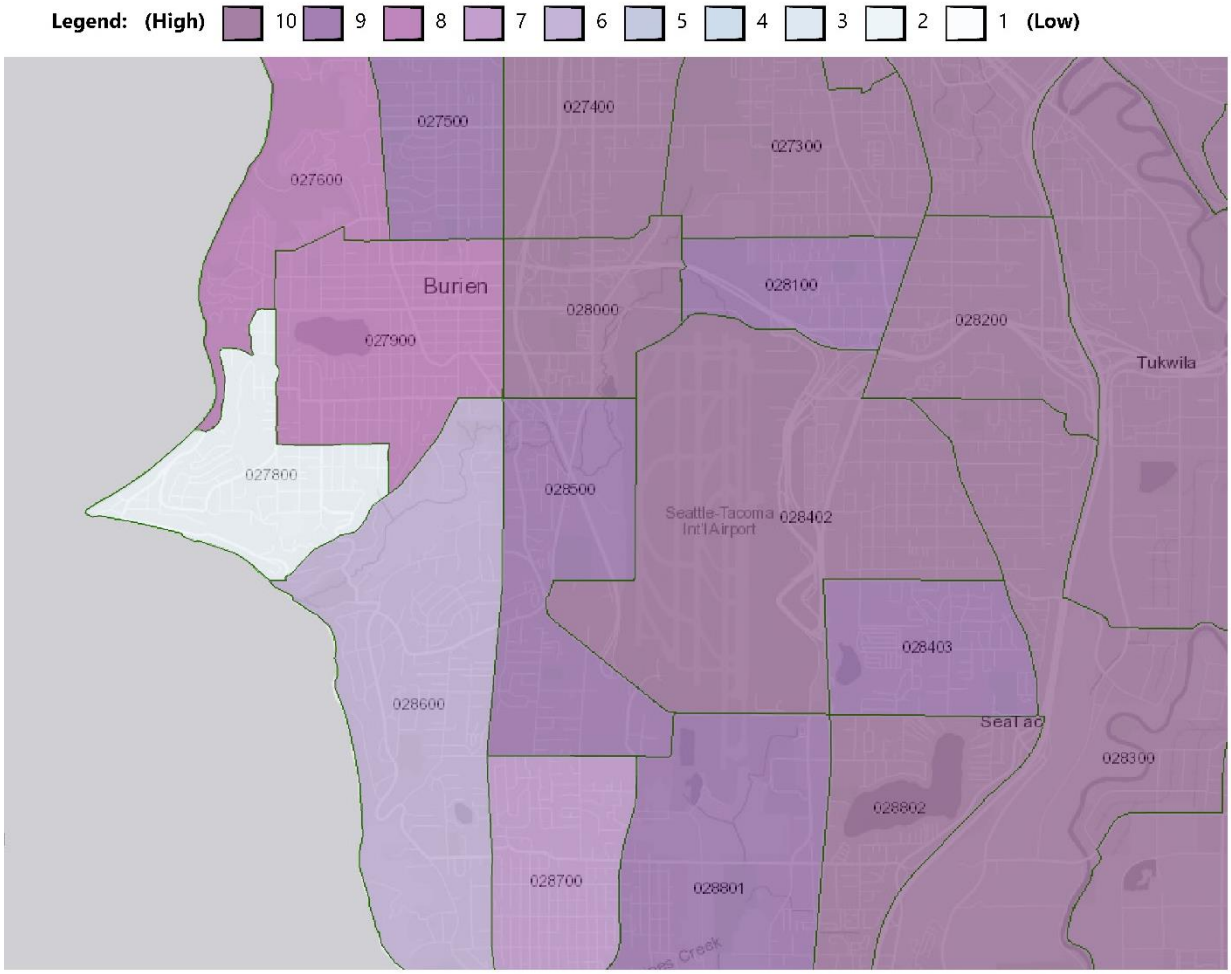
Exhibit 35. Means of Transportation to Work

	Total	Car, truck, or van -- drove alone	Car, truck, or van -- carpooled	Public transportation (excluding taxicab)
Workers 16 years and over	**26,502**	**16,978**	**3,454**	**2,504**
Race and Hispanic or Latino Origin				
White	52.40%	53.10%	39.30%	42.90%
Black or African American	8.40%	8.00%	6.00%	21.60%
American Indian and Alaska Native	0.50%	0.70%	0.10%	0.40%
Asian	14.50%	14.60%	19.30%	11.20%
Native Hawaiian and Other Pacific Islander	0.90%	0.70%	0.40%	2.70%
Some other race	14.30%	13.20%	25.90%	17.90%
Two or more races	8.90%	9.60%	9.10%	3.40%
Hispanic or Latino origin (of any race)	23.60%	22.50%	35.80%	25.10%
White alone, not Hispanic or Latino	47.60%	48.40%	33.30%	38.80%
Nativity and Citizenship Status				
Native	67.70%	66.80%	53.90%	69.90%
Foreign born	32.30%	33.20%	46.10%	30.10%
Naturalized U.S. citizen	14.50%	15.70%	17.50%	10.50%
Not a U.S. citizen	17.80%	17.40%	28.70%	19.60%
Language Spoken at Home and Ability to Speak English				
Speak language other than English	36.30%	35.60%	53.40%	37.70%
Speak English "very well"	13.20%	12.50%	19.20%	11.90%
Speak English less than "very well"	23.10%	23.20%	34.10%	25.70%

Source: American Community Survey, S0802, 5-Year 2021; BERK 2023.

Distribution of Environmental Exposures: The City of Burien lies along SR 509 and SeaTac International Airport. Most census tracts in Burien rate higher compared to all census tracts in the state regarding exposure to air pollution exposures to sensitive populations (BIPOC, low income, other). See Exhibit 36.

Exhibit 36: Environmental Health Disparities Map: Environmental Exposures, Environmental Effects, Socioeconomic Factors, Sensitive Populations



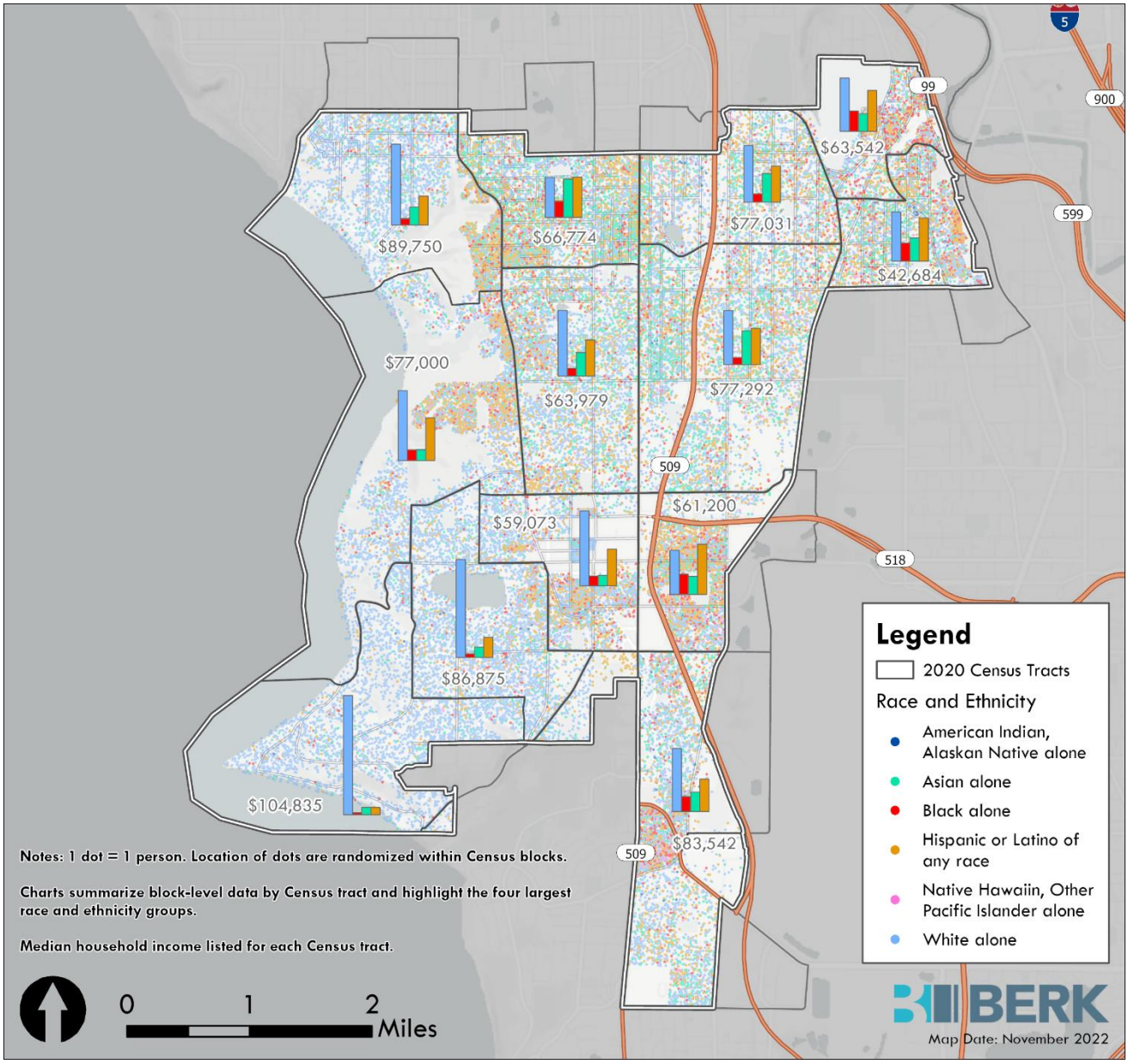
Source: (Washington Department of Health 2022)

Geographic Patterns

Economic Concentrations

This section identifies concentrations of racial groups with economic characteristics differing from the rest of the community. The map in Exhibit 37 shows population density in Burien by race and ethnicity, as well as median household income by Census tract. This visualizes geographic patterns in income distribution across the community, as well as clusters of various race and ethnic groups identified in the Census. The lowest income areas of the city are to the northeast (Southern Heights and Boulevard Park), followed by Burien's central corridor (Salmon Creek, Evansville, Chelsea Park, and Downtown). Concentrations of BIPOC households in these neighborhoods may reflect communities of interest for housing support and anti-displacement resource allocation in Burien.

Exhibit 37: City of Burien Population Density by Race and Ethnicity, 2020.

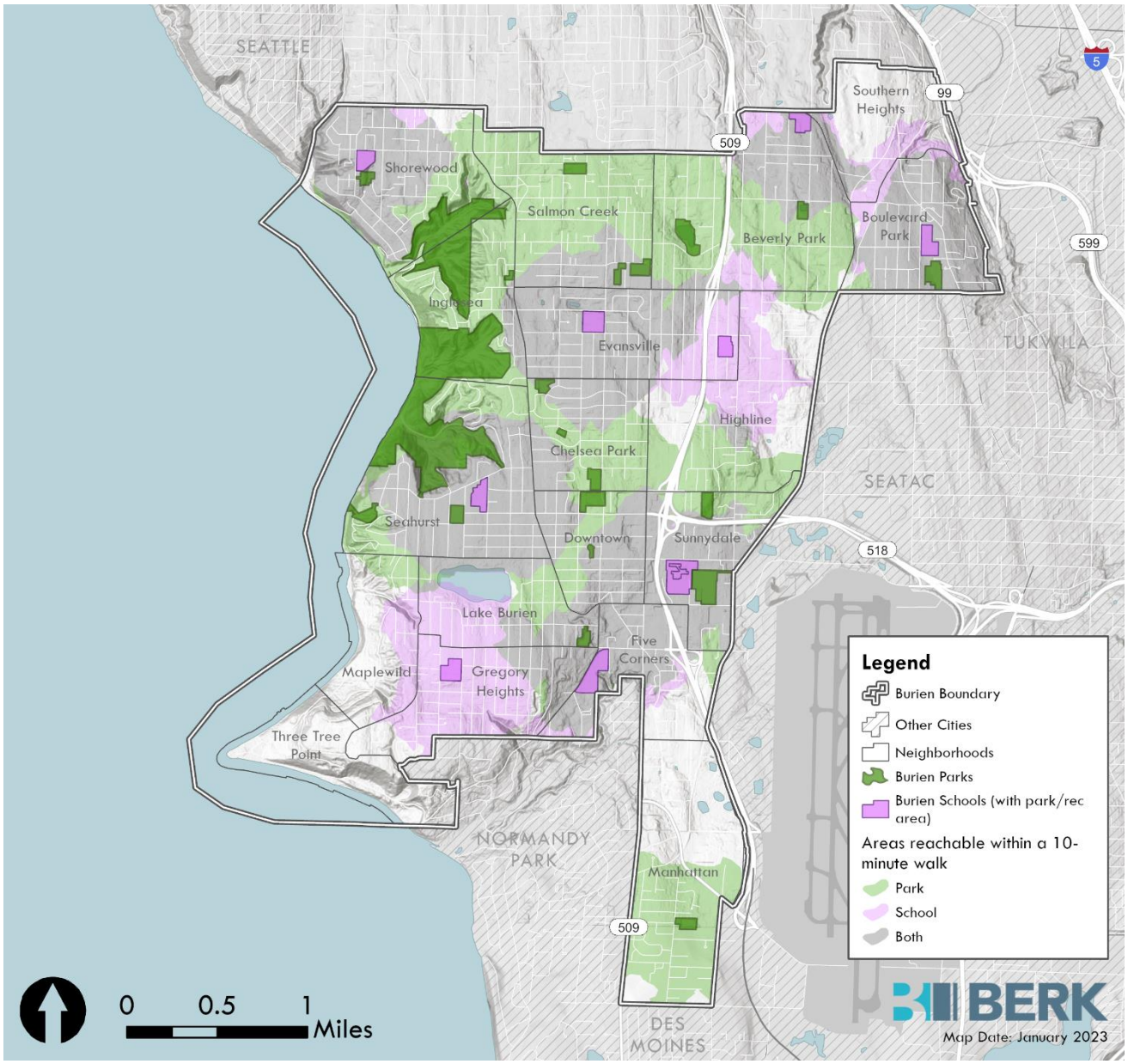


Sources: Census, 2020; BERK 2022.

Park and School Access

This section provides an evaluation of disparate investments in infrastructure availability including parks and schools. Housing choice affects the schools that children attend and access to parks. These amenities affect resident wellbeing. It could also result in future market pressure for displacement. Exhibit 38 identifies the lands within a 10-minute walk of a school or park.

Exhibit 38: Park and School Access



Source: City of Burien, King County, BERK 2023.

About 70-83% of each race or ethnic group tracked live in proximity to a park and around 48-57% near a school. See Exhibit 39.

Exhibit 39: Walkshed – Share of Population Living within a 10 Minute Walk of a Park

Race or Ethnicity	Parks	Schools	Both	Parks Total	School Total
AIAN alone	30.9%	11.6%	41.8%	72.7%	53.4%
Asian alone	38.6%	10.2%	40.7%	79.3%	50.9%
Black alone	30.1%	8.3%	46.3%	76.4%	54.6%
Hispanic or Latino	37.0%	7.8%	45.7%	82.7%	53.5%
NHOPI alone	34.3%	12.8%	35.8%	70.1%	48.5%
White alone	28.0%	13.2%	43.4%	71.4%	56.7%

The Highline School District schools serving Burien are listed in Exhibit 40 along with the percent attendance and the relative English Language Arts (ELA), Math, and Science standards performance. Some schools have less than half or less than two thirds of the students regularly attending the school and most schools have less than half of the students meeting English, Math, or Science standards. Schools in lower income areas have lower scores than those in higher income areas.

Exhibit 40: Schools Serving Burien and 2022-23 School Quality

School	Areas Served (Approx.)	% Regularly Attend	Met ELA Standards	Met Math Standards	Met Science Standard
Elementary					
Beverly Park	Beverly Park, Boulevard Park, Southern Heights	64.5	24.8	20.4	26.9
Cedarhurst	Highline, Sunnydale	57.9	24.0	21.2	32.4
Gregory Heights	Lake Burien, Five Corners, Gregory Heights, Three Tree Point, Maplewild	67.6	35.4	28.2	40.3
Hazel Valley	Evansville	50.6	23.8	12.6	28.6
Hilltop	Boulevard Park	58.7	18.6	11.4	20.0
Seahurst	Seahurst, Chelsea Park, Downtown	60.8	20.1	13.2	19.0
Shorewood	Shorewood	63.1	40.8	42.7	42.3
Middle & High Schools					
Cascade Middle School	Northwest Burien	57.2	26.2	11.6	24.4
Glacier Middle School	Central and Northeast	58.6	23.5	12.9	19.6

School	Areas Served (Approx.)	% Regularly Attend	Met ELA Standards	Met Math Standards	Met Science Standard
Sylvester Middle School	South Burien	64.7	43.2	27.0	40.4
Evergreen High School	North Burien	46.9	48.3	17.6	11.1
Highline High School	Central and South Burien	52.4	41.4	14.8	14.6
All Schools		58.4	33.4	21.5	26.8

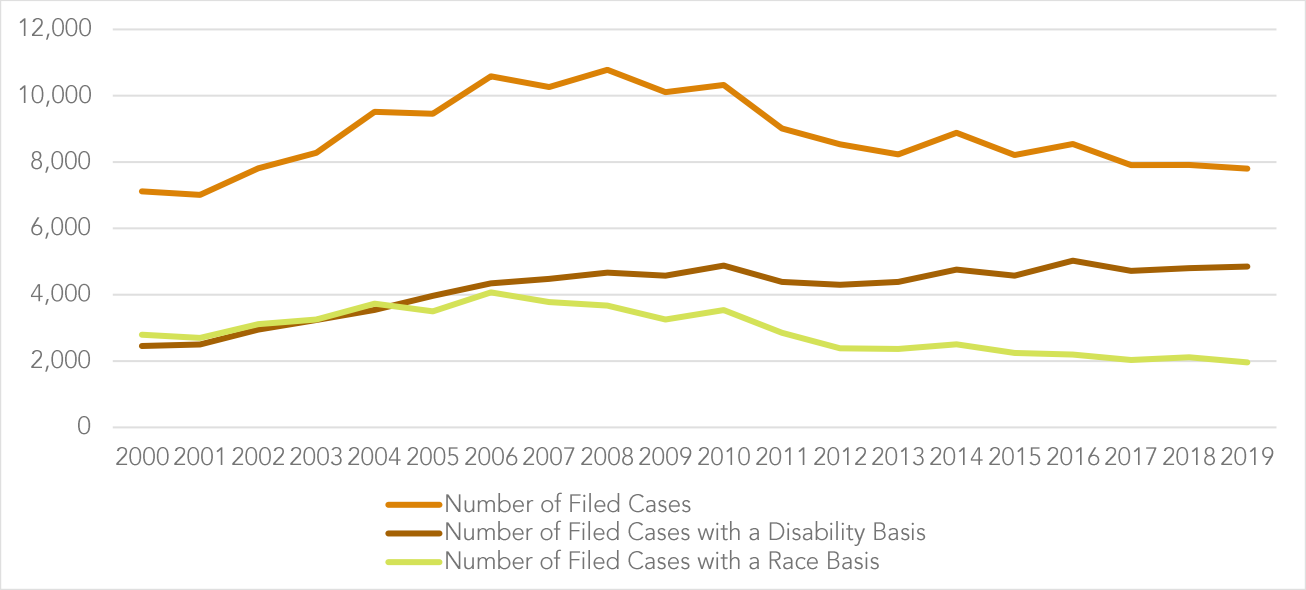
https://www.highlineschools.org/school-learning-sites/get-started/new-page
https://washingtonstatereportcard.ospi.k12.wa.us/ReportCard/ViewSchoolOrDistrict/100105

Fair Housing Complaints

This section presents state and federal level fair housing complaints. There is no city-specific data at this time.

The Fair Housing Act prevents housing discrimination on the basis of race, religion, familial status, sex (including gender identity), sexual orientation, disability, skin color, national origin, or as retaliation for asserting their rights under the Fair Housing Act. The US Department of Housing and Urban Development (HUD) has compiled all filed cases of Fair Housing Act complaints between 2000 and 2019. This data shows trends in complaints over time as well as the outcomes of all filed complaints. The national trends are seen in Exhibit 41 and show that the number of complaints nationally spiked in the late 2000s and early 2010s and has since leveled out relative to the year 2000. The highest number of complaints in each of the years HUD studied were filed on the basis of disability discrimination or racial discrimination which can also be seen in Exhibit 41.

Exhibit 41: Basis of Fair Housing Act Complaints Filed Across the U.S. 2000-2019



Source: (US Department of Housing and Urban Development 2022)

These complaints result in one of three probable outcomes listed in Exhibit 42: an administrative/judicial closure mostly coming from "no reasonable cause determinations", a withdrawal of complaint after resolution, or a settlement between parties. Other outcomes not listed in this exhibit include still open cases, charges filed on behalf of the complainant, or elections to federal district court.

Exhibit 42: Fair Housing Complaints Filed Across the U.S. 2000-2019

Year Filed	Number of Cases Filed	Percent Withdrawn		Percent Settled		Percent Administratively Closed	
2000	7116	10%	(744)	21%	(1510)	67%	(4741)
2001	7011	11%	(794)	20%	(1399)	67%	(4671)
2002	7813	10%	(816)	21%	(1625)	65%	(5107)
2003	8279	13%	(1043)	22%	(1828)	63%	(5214)
2004	9516	13%	(1230)	20%	(1864)	64%	(6124)
2005	9455	11%	(1077)	22%	(2070)	65%	(6152)
2006	10587	11%	(1177)	19%	(2021)	68%	(7189)
2007	10264	11%	(1178)	18%	(1894)	68%	(6990)
2008	10782	11%	(1236)	19%	(2056)	67%	(7219)
2009	10110	12%	(1228)	20%	(2045)	64%	(6451)
2010	10326	12%	(1281)	20%	(2089)	64%	(6602)
2011	9013	13%	(1197)	21%	(1859)	62%	(5608)
2012	8534	13%	(1123)	22%	(1848)	62%	(5306)
2013	8230	13%	(1084)	22%	(1818)	62%	(5072)

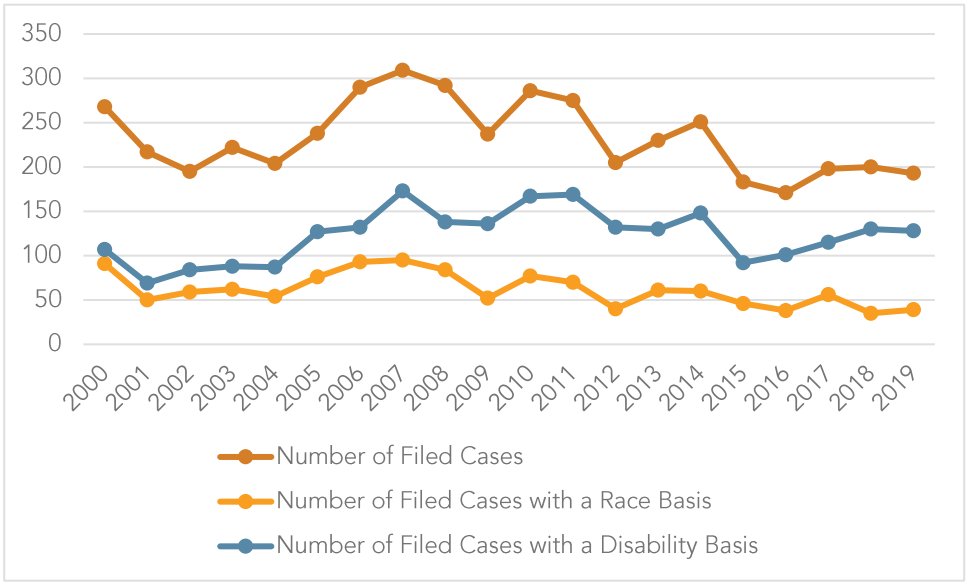
Year Filed	Number of Cases Filed	Percent Withdrawn		Percent Settled		Percent Administratively Closed	
2014	8882	12%	(1077)	22%	(1961)	62%	(5511)
2015	8212	9%	(728)	26%	(2099)	62%	(5073)
2016	8547	8%	(710)	30%	(2580)	57%	(4863)
2017	7908	8%	(646)	26%	(2075)	60%	(4748)
2018	7912	8%	(605)	23%	(1848)	63%	(4982)
2019	7801	7%	(521)	23%	(1774)	57%	(4485)

Source: (US Department of Housing and Urban Development 2022)

Fair Housing complaints in Washington mirror the rest of the country as seen in Exhibit 43. Most complaints are related to disability, but a large number of complaints are related to racial discrimination. Most complaints in Washington are also either dismissed, administratively closed, or a settlement is reached between the complainant and the housing provider.

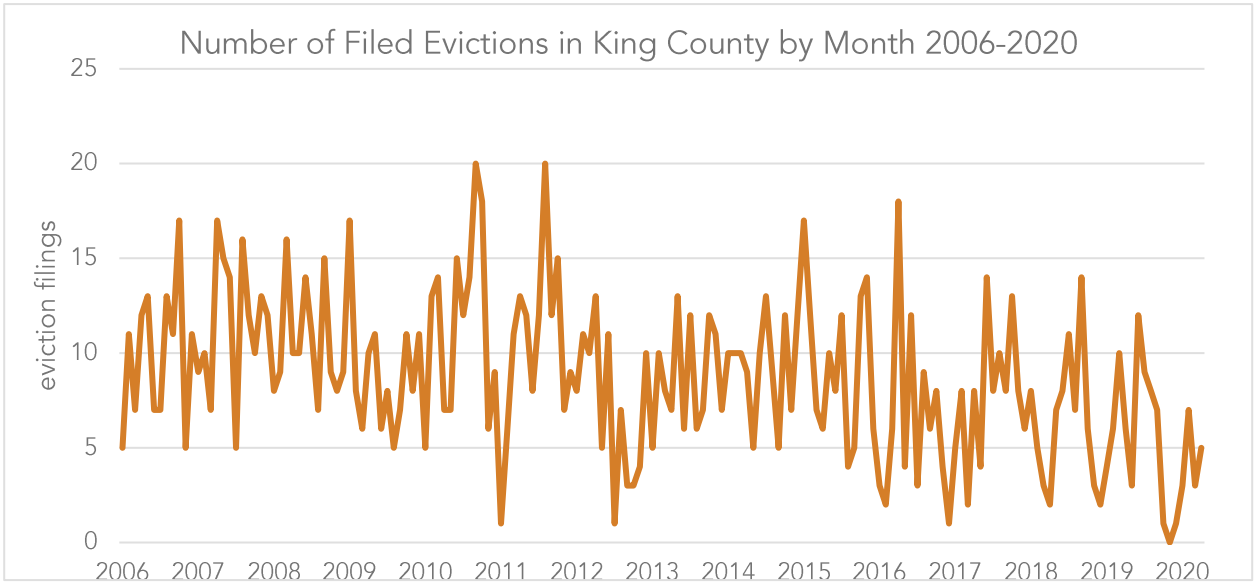
- Overall, Washington State had 4,664 complaints filed between 2000 and 2019 (most of which were related to discrimination based on disability), 1,158 resulted in Settlements, 13 resulted in charges being filed, and the rest either were closed administratively or were withdrawn/closed by the complainant.
- The trend in King County is shown in Exhibit 44; around 20 filings are made per month or less with a slightly declining trend. These cases are disproportionately filed on the basis of disability and on the basis of race. See Exhibit 45.

Exhibit 43: Basis of Fair Housing Act Complaints in Washington State 2000-2019



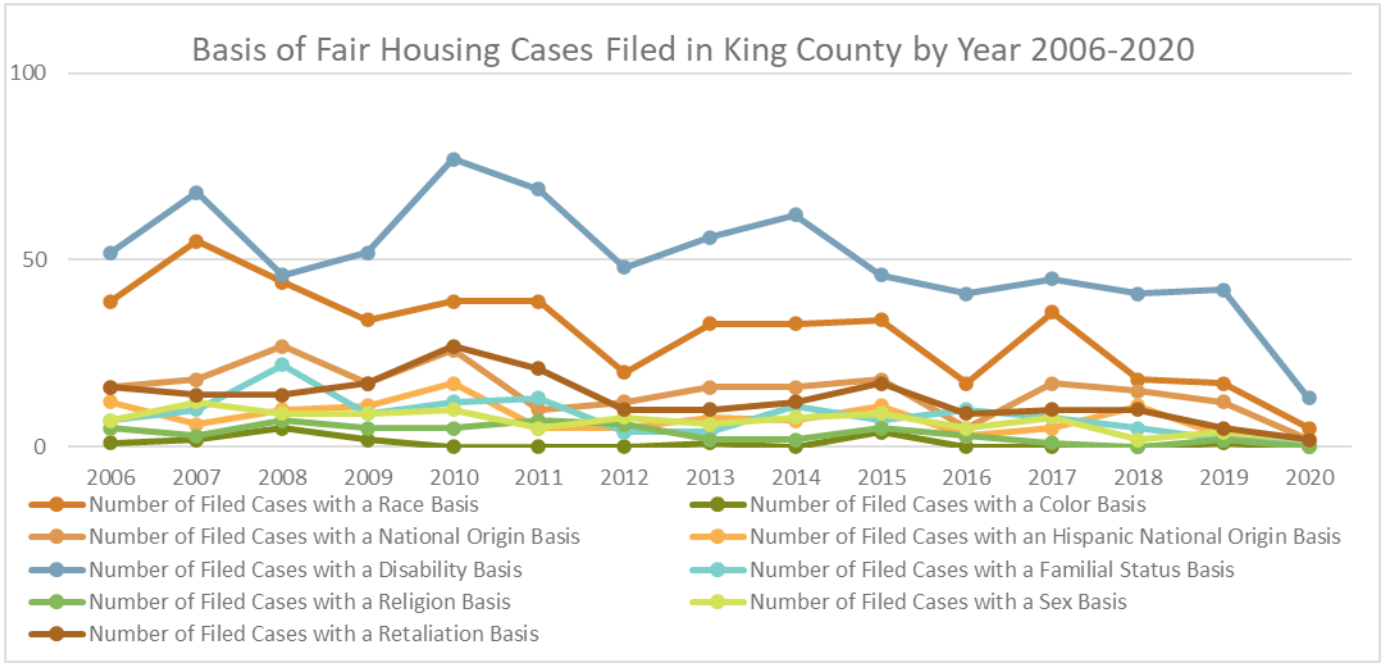
Source: (US Department of Housing and Urban Development 2022)

Exhibit 44: King County Specific Data – Monthly Filings 2006-2020



Source: (US Department of Housing and Urban Development 2022)

Exhibit 45: Type of Fair Housing Cases Filed in King County



Note: 2020 data in Exhibit above is only available through April 2020
Source: (US Department of Housing and Urban Development 2022)

Although most complaints do not result in settlement or resolution, the trend for King County, the State of Washington, as well as the country as a whole is an overall reduction in the number of cases filed annually and slight increase in the number of cases that provide retribution to the complainant (King County Data not available for this specific conclusion).

The changes in outcomes may be attributed to lower barriers for reporting housing discrimination and violations of the Fair Housing Act through both government and non-profit agencies. These cases are disproportionately filed on the basis of disability and on the basis of race. By continuing this trend and further lowering the barriers to file a complaint and bolstering tenant protections, Burien can drastically reduce systemic racially disparate impacts and discrimination against those with disabilities in housing.

Exclusion

For the purposes of this report, exclusion means keeping certain populations out of housing within a community or neighborhood, intentionally or unintentionally, leading to non-inclusive impacts.

This section considers whether the City is attracting all who want to live in Burien or if persons are excluded. The information reviewed includes:

- Reviewing the concentration of races and ethnicities, greater than the county average.
- Comparing the workforce to the resident-base.
- Concentration or dispersion of affordable housing or housing choice voucher usage within the jurisdiction.

Distribution of Race in Burien

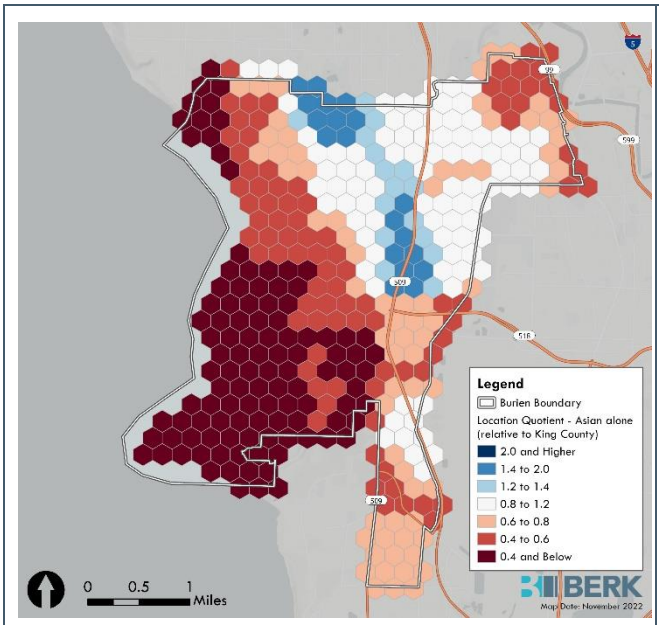
Compared to the county, Burien is more diverse with about 48% white alone versus 56% in King County. Generally, the community is more affordable as part of the South King County region compared to the county overall.

Within the city itself, and compared to the county as a whole, Burien shows more White residents concentrated in the west part of the city, Asian residents in the north central part of Burien, Black residents in northeast and southeast Burien, and Hispanic/Latino residents in particular in northern and eastern Burien. See Exhibit 46.

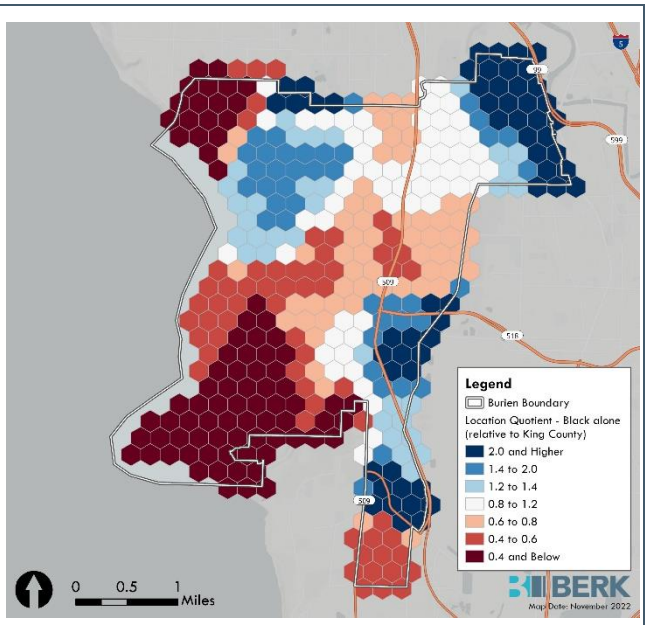
Generally, BIPOC residents are found primarily in areas with multifamily zoning or with RS 7200 square foot lots. White residents are more often located in newer single family homes built on the west side of the community such as on RS 9,600 zoned lots. There are several neighborhoods in central Burien with a proportion of White and BIPOC residents fairly similar to the county as a whole. See Exhibit 14 and Exhibit 15.

Exhibit 46: Concentrations of Race in Burien – Relative to King County

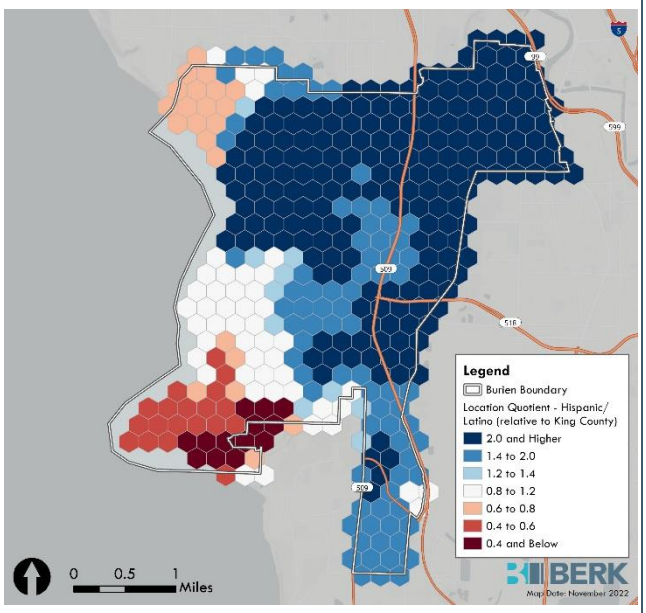
Blue Greater than County, Red less than County



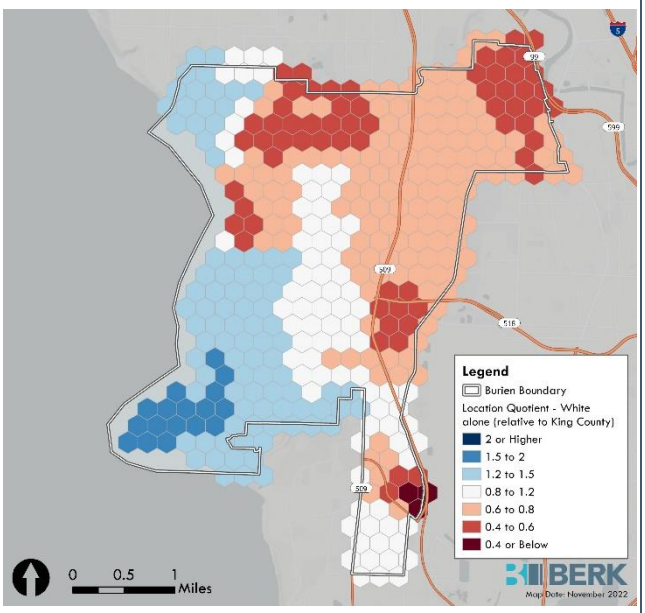
Asian Alone



Black Alone



Hispanic/Latino



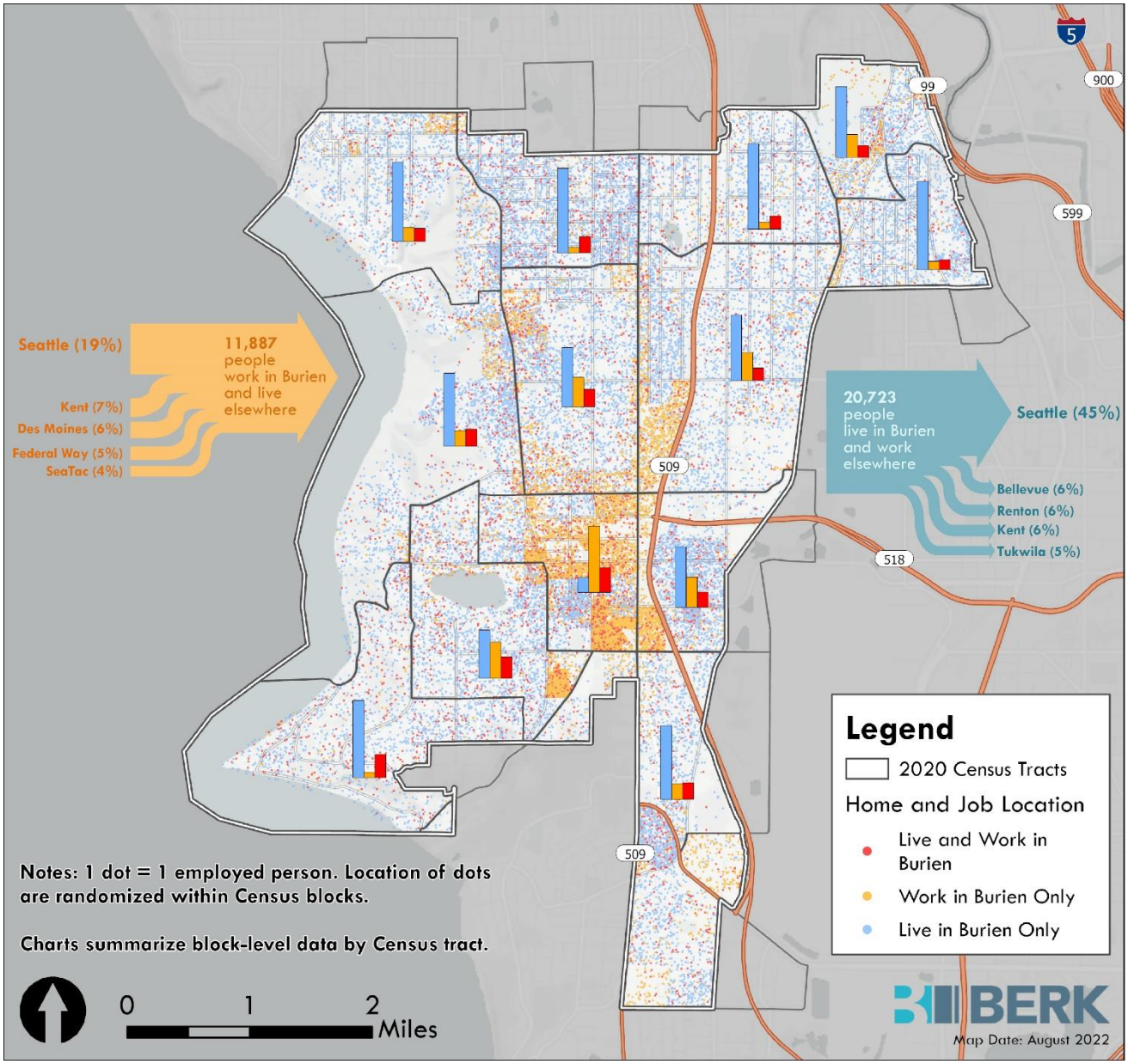
White Alone

Source: US Census 2020, BERK 2023.

Workers and Commuters Incomes

Most who commute into the City of Burien come from Seattle or other south King County communities. Most who commute outside of Burien for work go to Seattle or other south King County communities with some going to Bellevue. See Exhibit 47.

Exhibit 47: Job Inflow/Outflow Locations in Burien, 2019 (All Primary Jobs).



Sources: Longitudinal Employer-Household Dynamics, Origin-Destination Employment Statistics, 2019; BERK 2022.

Generally, Burien is a community where residents are similar in age to those who only work in Burien. Those who only live in Burien tend to have higher incomes than those who only work in Burien. Those who live and work in Burien tend to be moderate or higher in income. See Exhibit 48.

Exhibit 48: Job Inflow/Outflow Demographic Characteristics in Burien, 2019 (All Primary Jobs).

		Age of Workers			Monthly Income of Workers		
	Total Workers	29 or Younger	30 to 54	55 and Older	$1,250 or less	$1,251 - $3,333	$3,334 or more
Live in Burien	**20,723**	19.6%	57.0%	23.4%	10.7%	27.8%	61.5%
Work in Burien	**11,887**	22.2%	53.7%	24.1%	14.7%	31.8%	53.5%
Live and work in Burien	**3,358**	21.6%	49.6%	28.8%	18.5%	36.3%	45.1%

Sources: Longitudinal Employer-Household Dynamics, Origin-Destination Employment Statistics, 2019; BERK 2022.

Affordable Housing Concentration

Affordable multifamily housing in Burien is found in mixed use and multifamily zoned areas of the community. See Exhibit 49.

Exhibit 49: Income Restricted and Subsidized Housing in Burien

Location	Location	Number Units and Bedroom Size	Tenant
KCHA			
Boulevard Manor	Boulevard Park	70 units – 1 bedrooms	People age 62+People with disabilities
Burien Park	Downtown	102 units – 1 bedrooms	People age 62+People with disabilities
Munro Manor	Sunnydale	60 units – 1 bedrooms	People age 62+People with disabilities
Yardley Arms	Evansville	67 units – 1 bedrooms	People age 62+People with disabilities
KCHA Other Rental			
Arbor Heights	Salmon Creek	97 units – 1 , 2 , 3 bedrooms	Families, People age 55+People with disabilities
Woodridge Park	Boulevard Park	143 — 1-bedroom 58 — 2-bedroom & 1-bath	All ages, accepts Section 8 vouchers
Federal/State Funded			
Burien Haus Apts.	Downtown	34 units (33 affordable) – 1 bedroom	Elderly, Persons with Disabilities, 30% AMI
Burien Veterans House	Evansville	6 units	0-30% AMI Income-Restricted Units
Cedarstone Apts	Inglesea	30 units (28 affordable)	Special Needs
Franciscan Apartments	Lake Burien	38 units – 1 bedroom	Elderly, Persons with Disabilities
Independence Bridge	Downtown	50 units (48 affordable)	Youth/Young Adult Housing
Lake Apartments	Downtown	24 units (22 affordable)	0-30% AMI Income-Restricted Units
LARC @ Burien	Boulevard Park	160 units	Elderly, Persons with Disabilities, 51-80% AMI
Vintage at Burien	Highline	101 (99 affordable)	People age 62+People with disabilities
The Willows	Shorewood	30 units	Special Needs

Source: (King County Housing Authority 2023), WSHFC, 2023, PolicyMap, 2020

KCHA's Section 8 waiting list is closed as of March 2020. "We do not know when the waiting list will re-open in the future."

Naturally occurring affordable housing includes multiplexes and apartments often found in Ambaum Boulevard, Beverly Park, Boulevard Park, Downtown, Sunnydale, and Manhattan neighborhoods, which generally have a diverse range of residents. Surveyed units have been confirmed with regard to the number of units and incomes served (area median income [AMI]). Predicted NOAH are parcels that have characteristics similar to the surveyed properties with verified units. See Exhibit 50.

Exhibit 50: Naturally Occurring Affordable Housing (NOAH) – Surveyed and Predicted

Unit Type	Predicted NOAH *Parcels* meeting income of 60% AMI + with at least 50% Probability	Predicted NOAH *Parcels* meeting income of 50% AMI + with All Probabilities	Surveyed NOAH: Dwelling Units		
			50% AMI	60% AMI	80% AMI
4-Plex	43	62			
Apartment	111	157	73	314	1589
Apartment(Mixed Use)	5	7			
Duplex	2	4			
Single Family(C/I Zone)	1	1			
Single Family(Res Use/Zone)	0	1			
Townhouse Plat	0	1			
Triplex	2	4			
	165	**237**	**73**	**314**	**2,132**

Source: King County, BERK 2023

Displacement

As described in Chapter 1, displacement refers to a process by which a household is forced to move from its community because of conditions beyond their control, which may be economic, cultural, or physical (due to eviction or other factors).

This section addresses potential indicators of displacement, including:

- Number of homes that could be lost due to expiring affordable housing covenants.
- Units lost due to demolition, condemnation, or other events.
- Number and location of foreclosures
- Patterns of evictions

Expiring Affordable Housing Covenants

Based on the National Housing Preservation Database,[12] of Burien's over 1,000 subsidized housing units, more than half are owned privately and have covenants that are scheduled to expire in the next five years. These units are located at two developments:

- Seahurst Village Apartments: 543 Units, expiration in 2023.
- Veranda Green, 147 studio, 1-bedroom, and 2-bedroom units located adjacent to the Rainier Golf and Country Club in northeast Burien.

The loss of the affordability covenants on these housing developments could displace many, if not all, current residents. Other affordable housing covenants would expire in the 2030s and 2050s.

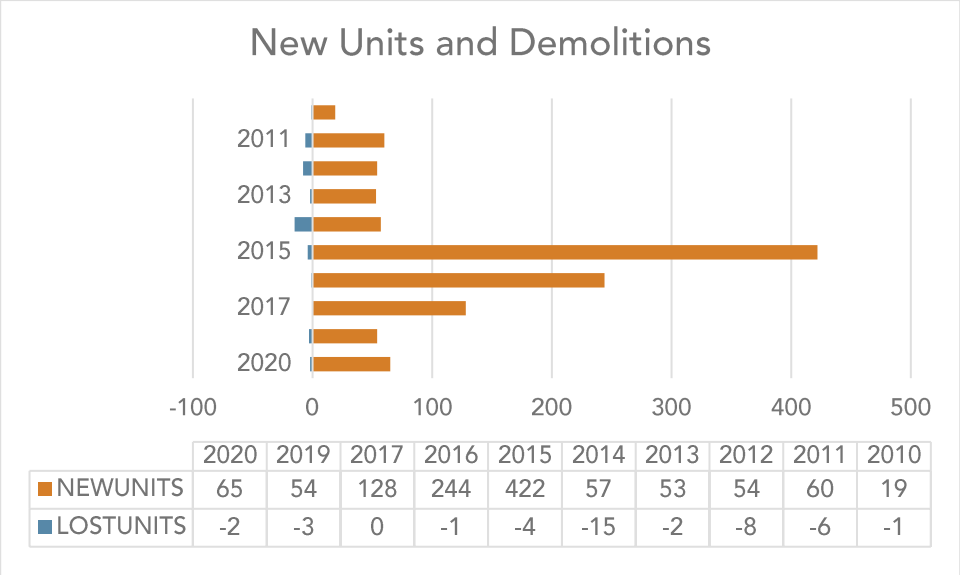
Recent state laws promote 50-year affordability covenants when incentives are authorized. (RCW 36.70A.540)

Housing Demolitions and Loss

Over the 2010-2020 period, the City had a net increase in housing, with 3.6% of permits for demolitions (42) and new units of 1,156 leaving a net new number of units at 1,114.

[12] Explanation of database is provided here: https://preservationdatabase.org/about-the-database/.

Units Permitted: New and Demolition



	2020	2019	2017	2016	2015	2014	2013	2012	2011	2010
NEWUNITS	65	54	128	244	422	57	53	54	60	19
LOSTUNITS	-2	-3	0	-1	-4	-15	-2	-8	-6	-1

Note: 2018 Data not available.
Source: (PSRC 2021); BERK 2023.

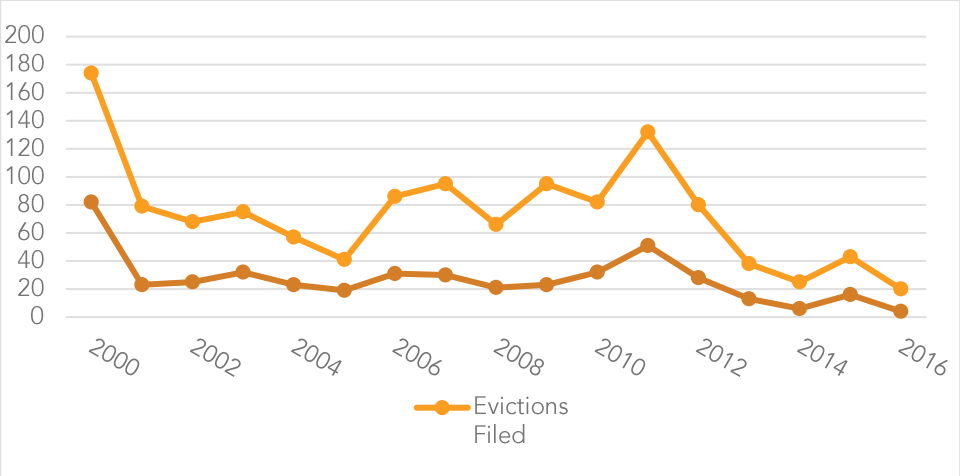
While substantial numbers of units are not lost to demolitions, some evictions noted below are due to owners wishing to sell.

Eviction Risk

Evictions 2000-2016

The Eviction Lab at Princeton University has developed a database of evictions across the country. Data is available at a block group level. In Burien, there were 2,609 eviction filings and 1,417 evictions that took place between 2000 and 2016. This data is presented in Exhibit 52 and shows that the highest number of evictions took place in block in Block Group 276.2 by a wide margin. This block group is a predominantly non-white community that mostly encompasses the Inglesea neighborhood of Burien per Exhibit 20. In the time frame of this study, 797 evictions were filed and 459 of these eviction filings resulted in evictions. There was a spike in evictions in 2000 and an overall downward trend over time per Exhibit 51. Other block groups have high levels of eviction and high eviction risk and are represented in Exhibit 52.

Exhibit 51: Evictions and Eviction Filings in Washington State Census Block Group 276.2 2000-2016



Source: Princeton University Eviction Lab Study 2016

Exhibit 52 : Burien Block Groups with Most Evictions 2000-2016

Block Group	Evictions between 2000 and 2016	Average Block Group Population Between 2000 and 2016
276.2	459	2384
267.2	153	1900
280.2	108	1380
280.1	106	1193
285.3	88	1409
276.1	75	1186

Source: Princeton University Eviction Lab Study 2016

Both block groups 280.1 and 280.2 represent areas of Burien that have a higher Hispanic population than King County as a whole whereas block group 267.2 is an area in the NE corner of Burien that has a higher White population than King County per Exhibit 46.

Eviction data from the Princeton University Eviction Lab Study conducted from 2000-2016 highlights the racially unequal distribution of high eviction rates in certain areas of Burien. Of the 28 block groups with more than 100 evictions between 2000 and 2016, three out of four represent areas with higher percentages of Hispanic and Black individuals than King County as a whole. While high rates of eviction are not seen across all predominantly non-white census block groups there are clear disparities between certain communities and eviction risk.

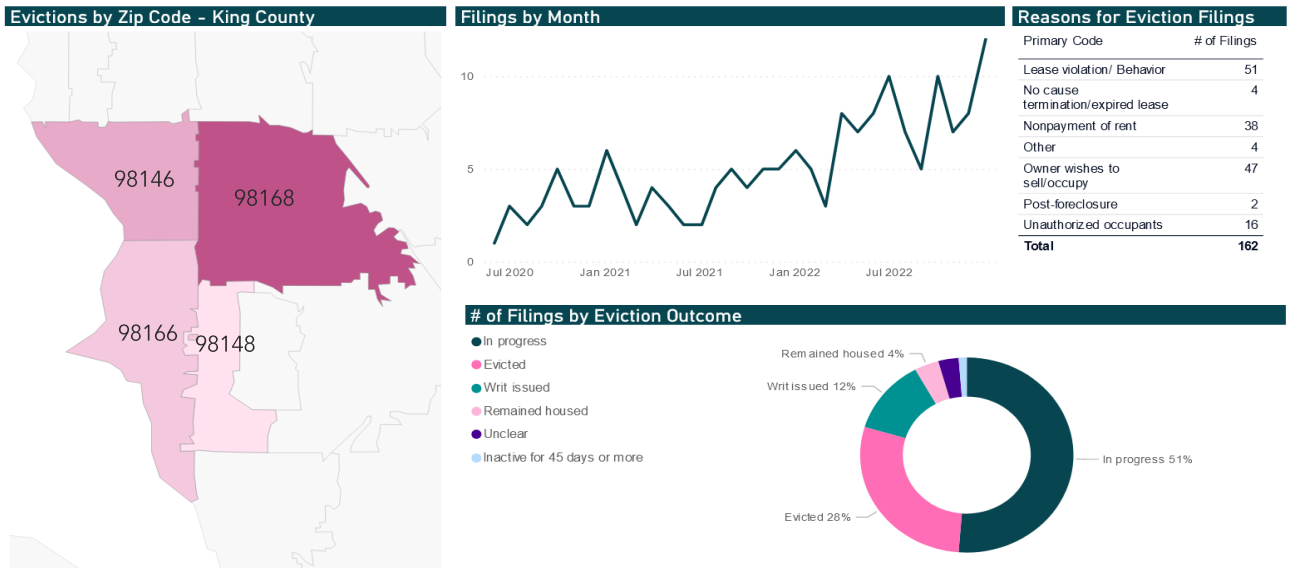
Evictions filings after the COVID-19 Pandemic

The King County Bar Association Housing Justice Project has also compiled data related to evictions in the aftermath of the COVID-19 Pandemic by ZIP code. The four ZIP codes that encompass Burien have experienced an increase in evictions since the expiration of the eviction moratorium on June 30, 2021 (RCW 59.18.630), and this has resulted in more eviction filings and evictions throughout Burien over the last three years. Between July 2020 and January 2023, 162 evictions have been filed in the four Burien Zip codes where data was collected; some of these evictions would occur in the portions of the zip codes outside of Burien city limits (e.g. portions of White Center, portions of SeaTac or Tukwila). About 47 of these eviction filings (29%) are due to the owner wishing to sell/occupy.

The higher proportion of eviction filings relative to population occurred in ZIP codes 98148 and 98168. The eviction filings per 1000 residents were 2.04 and 2.14 respectively while 98146 and 98166 where roughly even at 1.44 eviction filings per 1000 residents. These areas represent a higher proportion of non-White residents than the other ZIP codes that are at lower risk for eviction.

While not all filings resulted in an eviction and most are still in process, this data still highlights an opportunity to reduce the racially disparate impacts of eviction on communities of color in Burien.

Exhibit 53: Eviction Filings During the COVID 19 Pandemic



Source: King County Bar Association Housing Justice Project

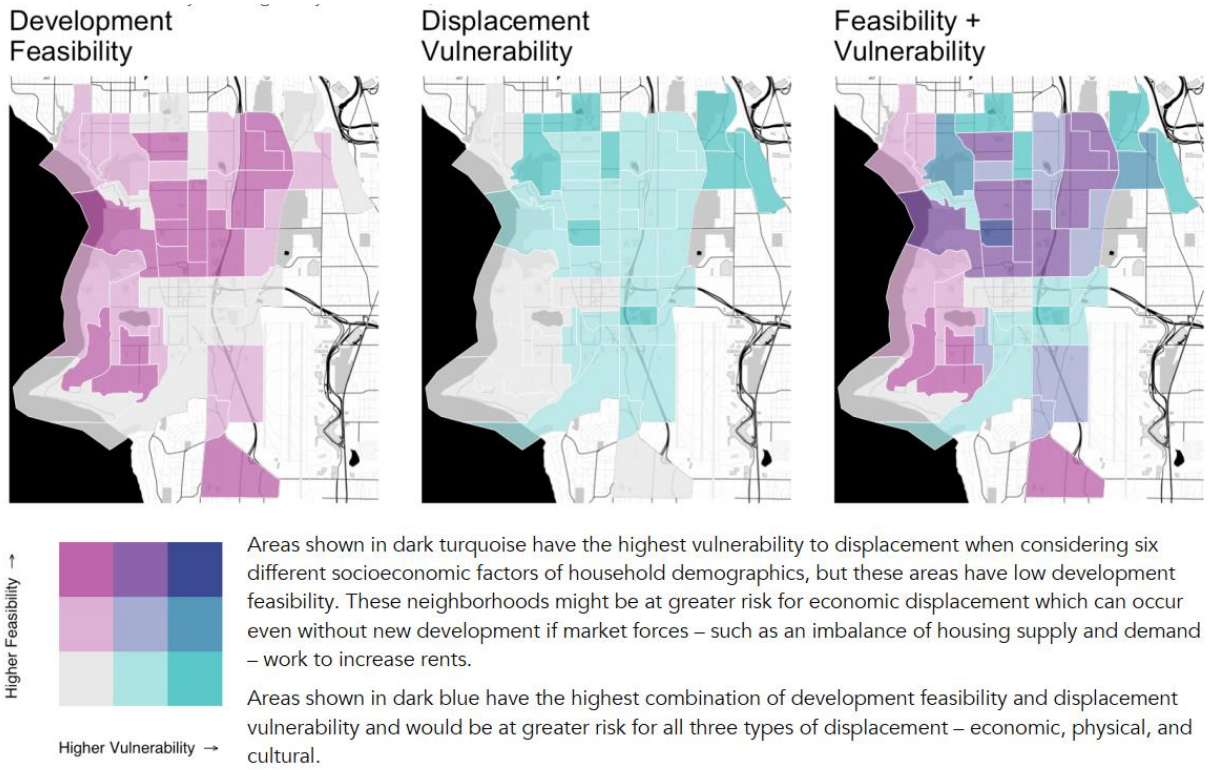
Displacement Risk Analysis

Burien's Housing Action Plan (2021) considered displacement risk at a block group level using PSRC's Displacement Risk Mapping Tool (2015) as an example. The evaluation considered two primary components: feasibility of new development if parcels with housing are redeveloped and

risk of displacement considering demographic information (BIPOC percent, non-English language at home percent, persons without a Batchelor's degree percent, renter households' percent, cost-burdened households percent, per capita income). High-risk tracts have index scores in the 90th percentile range or above, medium-risk tracts are in the 50th to 90th percentile range, and low-risk tracts are in the 50th or lower percentile.

Results are shown in Exhibit 54. The central Ambaum corridor around Evansville appeared to have the highest risk with vulnerable populations and development feasibility. The most vulnerable areas are in northern Ambaum corridor and Boulevard Park though not necessarily with the most development feasibility.

Exhibit 54: Burien Displacement Risk 2018 Census Data: Housing Action Plan



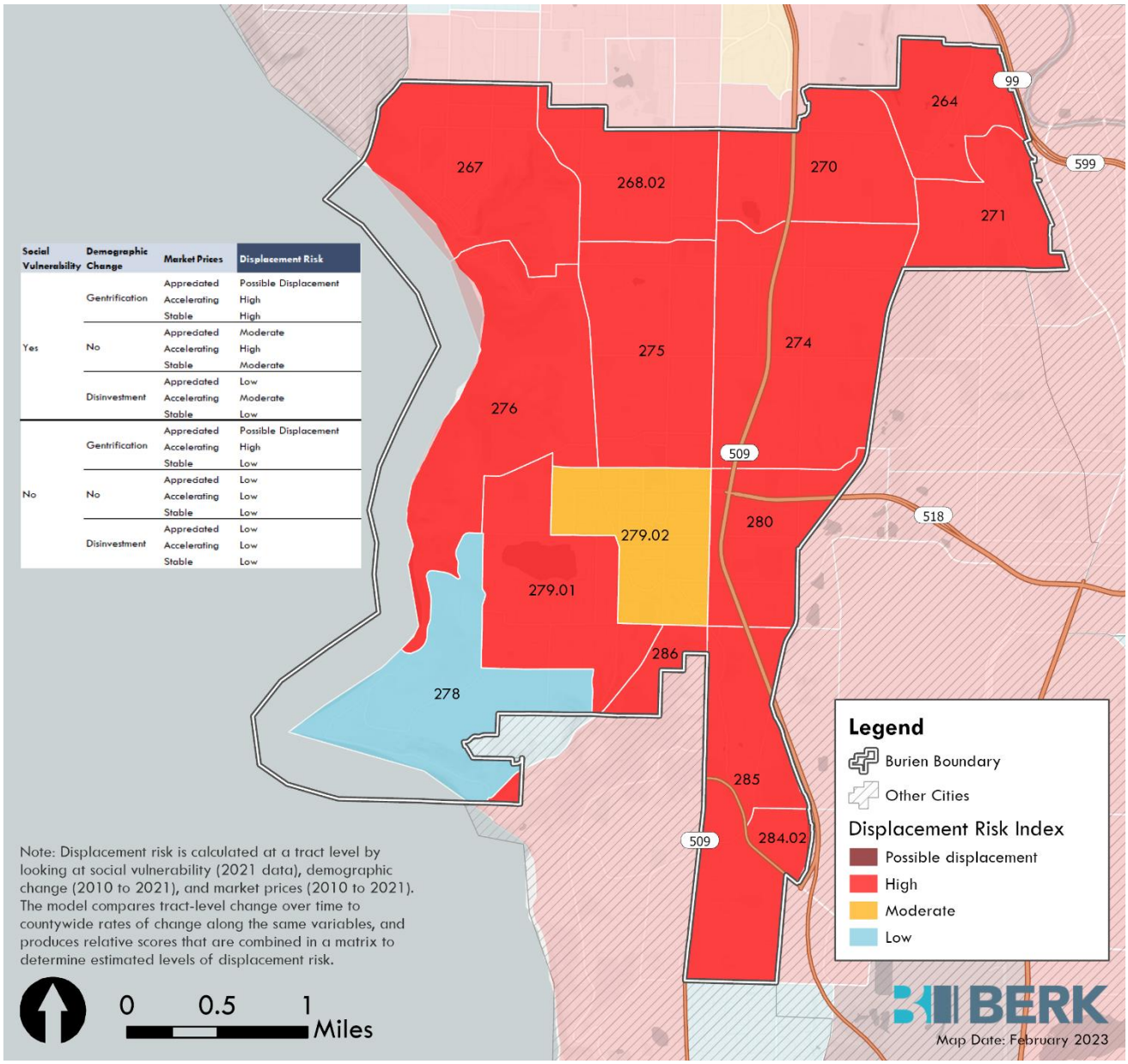
Source: ECONorthwest 2021.

Another similar method is employed at the Census Tract level with 2020-2021 information addressing the **social vulnerability** of the residential population, evidence of **demographic change**, and **market conditions** (Lisa Bates, 2013).

- Social Vulnerability: BIPOC Share 2020, renter share 2021, and median household income 2021.
- Demographic Change: Percent change in the BIPOC population (2010-2020), and percent change in households with incomes at or below 80% of the county median income (2010-2021).
- Market Trends: Average Rent 2015, and change in average rent between 2010 to 2021.

The Displacement Risk is considered high, moderate, or low depending on whether there is social vulnerability, potential for demographic change, and appreciating or accelerating prices. See Exhibit 55. Details of scores are in Exhibit 56. Most of Burien is considered at Risk except in Downtown and Three Tree Point.

Exhibit 55: Displacement Risk 2020: Social Vulnerability, Demographic Change, Market Prices



Source: BERK 2023.

Exhibit 56: Tracts and Displacement Risk Scores

		Social Vulnerability				Demographic Change			Market Prices			
Burien city Tracts	Percent of Tract in City	Renter Quintile	BIPOC Quintile	Median Income Score	Final Score	BIPOC Change Score	Under 80% AMI Change Score	Demographic Change Score	Rent Level	Appreciation Rate	Market Price Score	Final Displacement Risk
Tract 264	32%	4	5	4	13	Decreasing BIPOC	Decreasing Low Income HHs	Gentrification	Low rent area	Low or mod appreciation	Stable	High
Tract 267	71%	2	3	3	8	Decreasing BIPOC	Decreasing Low Income HHs	Gentrification	Low rent area	High appreciation	Accelerating	High
Tract 268.02	81%	3	5	4	12	Tracking county change	Decreasing Low Income HHs	Gentrification	Low rent area	Low or mod appreciation	Stable	High
Tract 270	88%	3	5	3	11	Decreasing BIPOC	Decreasing Low Income HHs	Gentrification	Low rent area	Low or mod appreciation	Stable	High
Tract 271	88%	4	5	5	14	Decreasing BIPOC	Tracking county change	Gentrification	Low rent area	Low or mod appreciation	Stable	High
Tract 274	100%	2	5	4	11	Decreasing BIPOC	Tracking county change	Gentrification	Low rent area	Low or mod appreciation	Stable	High
Tract 275	100%	3	4	4	11	Decreasing BIPOC	Tracking county change	Gentrification	Low rent area	Low or mod appreciation	Stable	High
Tract 276	100%	3	4	4	11	Decreasing BIPOC	Decreasing Low Income HHs	Gentrification	Low rent area	Low or mod appreciation	Stable	High
Tract 278	90%	1	1	1	3	Tracking county change	Tracking county change	No	Low rent area	Low or mod appreciation	Stable	Low
Tract 279.01	100%	2	2	2	6	Decreasing BIPOC	Decreasing Low Income HHs	Gentrification	Low rent area	High appreciation	Accelerating	High
Tract 279.02	100%	5	3	4	12	Increasing BIPOC	Increasing Low Income HHs	Disinvestment	Low rent area	High appreciation	Accelerating	Moderate

		Social Vulnerability				Demographic Change			Market Prices			
Burien city Tracts	Percent of Tract in City	Renter Quintile	BIPOC Quintile	Median Income Score	Final Score	BIPOC Change Score	Under 80% AMI Change Score	Demographic Change Score	Rent Level	Appreciation Rate	Market Price Score	**Final Displacement Risk**
Tract 280	100%	5	5	4	14	Decreasing BIPOC	Decreasing Low Income HHs	Gentrification	Low rent area	High appreciation	Accelerating	High
Tract 28402	1%	4	5	4	13	Tracking county change	Decreasing Low Income HHs	Gentrification	Low rent area	High appreciation	Accelerating	High
Tract 285	99%	4	4	4	12	Tracking county change	Decreasing Low Income HHs	Gentrification	Low rent area	High appreciation	Accelerating	High
Tract 286	5%	2	1	2	5	Tracking county change	Decreasing Low Income HHs	Gentrification	Low rent area	High appreciation	Accelerating	High

4 Policy Evaluation

HB 1220 indicates cities and counties should identify and implement "policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions." This Chapter evaluates Comprehensive Plan policies for potential revision to accomplish more inclusive housing opportunities and to undo impacts.

Housing Element Review

To review the Housing Element of the Comprehensive Plan, a series of evaluation questions were 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 evaluated as "C" or "A" are addressed in the **Recommendations** section.

Exhibit 57: Housing Policy Evaluation Framework

Criteria	Evaluation
The policy is valid and 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

Exhibit 58 applies the evaluation framework across policies in the existing Burien Comprehensive Plan's Housing Element.

Exhibit 58: Findings for Housing Element

Policy	Initial Evaluation	Rationale
Pol. HS 1.2 Burien should promote an economically diversified housing supply, including low, middle, and upper income levels, to serve a broad range of community needs.	A	The use of vague language in this policy is the rationale for rating it A rather than S. Should specify that Burien "will promote" or "will incentivize an economically…". Specifying the different income striations is also important for clarity. Addressing income bands can be accomplished in the Element text but should be referenced in the policy to strengthen it. (The Housing Action Plan suggested adjusting Multifamily Tax Exemption and incorporating an inclusionary housing program as implementation activities. Other ideas may flow from the Middle Housing Grant and Comprehensive Plan Update.)
Pol. HS 1.3 Encourage new and innovative housing types that meet the evolving needs of Burien households, and expand housing choices in all neighborhoods which meet the goals set under RCW 36.70A.020(4). These housing types include but are not limited to single family dwelling units; multi-family dwelling units; accessory dwelling units; cottage housing; pre-fabricated homes such as manufactured, modular, and mobile homes; co-housing; and clustered housing/clustered services.	S	This policy is strong. It promotes and names housing types and specifically calls out the evolution of community needs.
Pol. HS 1.35 The City should encourage multi-family residential uses near and within designated commercial nodes and within its urban center, subject to development standards and design guidelines.	S/A	The use of the word encourage lacks the means to achieve the aims of this policy. This policy does have anti-displacement elements as increasing multi-family residential in and near centers and corridors is inherently anti-displacement; strengthening housing in proximity to services and jobs could support a jobs-housing balance and reduce commuting out of Burien. The City will be addressing 15-minute city concepts in the Comprehensive Plan Update.
Pol. HS 1.6 Neighborhood design considerations should be included in City land use policies and regulations, such as site standards, landscaping requirements and building design guidelines.	C	Policies that limit development through mechanisms such as "neighborhood design considerations" can limit growth and increase displacement risk as housing costs increase. The most notable factor of this is the building design guidelines that can hinder new construction. Ensuring that design standards promote healthy quality housing while not over-burdening costs is a consideration that could be referenced in the policy.
Pol. HS 1.8 The City's affordable housing strategy shall place a high priority on conserving and improving the City's existing housing stock. The City should accomplish this through code enforcement, appropriate zoning, and participation in housing rehabilitation programs.	S	This policy can limit displacement. Emphasizing the participation in housing rehabilitation programs as this has the highest anti-displacement potential. Folding in reference to the City's housing inspection program could also bolster the policy, including any lessons learned to date. Ways to retain naturally occurring affordable housing are important.
Pol. HS 1.10 The City's strategy for affordable housing will also include:	A	This policy and the sub sections each meet the criteria listed in the Rubric. The policy could

Policy	Initial Evaluation	Rationale
a. allowing quality designed prefabricated housing within single family neighborhoods, b. facilitating the construction of multi family developments in downtown and in commercial nodes which are in close proximity to services and facilities; and c. allowing accessory dwelling units in single family neighborhoods. d. encouraging and allowing mixed use developments within identified commercial nodes.		reference allowing middle housing types in single family zones to further promote housing that is more affordable. Ensuring it is in all single family zones that have suitable lots is also important to increasing affordable housing choices (RS 12000 as well as RS 7,200).
Pol. HS 1.11 Promote the development of accessory dwelling units (ADUs) within new and existing single-family developments to provide additional housing choices for all economic income levels, multi-generational and smaller households in residential neighborhoods. Consider incentives for new housing developments that include a percentage of ADUs as part of the new construction, as well as explore opportunities to promote ADU construction in existing homes.	S	Lessons learned in the City's recent ADU code may be appropriate to fold into policy adjustments as needed.
Pol. HS 1.12 Existing mobile home parks in the City provide an important affordable housing choice for low-income residents and should be protected from closures without adequate relocation plans. The City should ensure that sufficient relocation plans are in place prior to closure of any housing that serves low-income residents.	A	Measures to prioritize preservation and improvement could be added with relocation a secondary priority.[13]Two different housing types/household incomes are referenced in this policy. Is the policy only meant to support relocation plans upon closure of mobile home parks, does it include all low-income housing developments, or does it support relocation plans for all low income residents? Would also recommend including "extremely low-income" to this policy to better align with GMA and current income characteristics of Burien.
Pol. HS 1.13 Enable and encourage development of middle income housing. This includes multi-unit or clustered residential buildings that provide relatively smaller or alternatives to single family housing such as cohousing or shared housing options; more units; and a scaled transition between the core of the mixed use development and surrounding single family areas. Where appropriate, apply zoning that would allow this within neighborhoods with relatively low risk of displacement and within proximity to designated centers, corridors with frequent service transit, and transit stations	A	This policy addresses two concepts: 1) middle housing and 2) avoiding upzones in areas at risk of displacement. Suggest splitting into two policies. Middle housing typically would be a gentle density approach that is meant to add to housing choices in an area and would not be expected to cause high levels of displacement; whereas careful considerations for upzones in displacement risk areas is a broader topic. Suggest addressing priorities for low- and very-low-income households.
Pol/ HS 1.14 The City should encourage the development of affordable housing through incentives including density bonuses.	S/A	Clear anti-displacement policy through incentivizing the creation of higher du/ac of affordable housing units. The City could also add reference here or in another policy regarding inclusionary housing per Housing Action Plan (B3).
Pol. HS 1.15 The City will coordinate its affordable housing analysis with the affordable housing policies of the King County Countywide Planning Policies.	N/A	The Countywide Planning Policies call for a local certification of housing elements in relation to Countywide Planning Policies. This policy may highlight anti-displacement activities through analysis though it is not directly helping the city meet the GMA housing element requirements.

[13] See: https://mrsc.org/explore-topics/planning/housing/manufactured-housing.

Policy	Initial Evaluation	Rationale
Pol. HS 1.16 The City should compile and make available housing and housing agency services information to assist both low and moderate income families in finding adequate housing and to assist both non and for profit developers in locating affordable housing	S	This is an administrative task that can lower displacement risk. Examples of "housing information" could be helpful.
Pol. HS 1.17 The City should periodically evaluate its development standards and regulations for effects on housing costs, and, where appropriate, modify development regulations that unnecessarily add to housing costs.	S	Identifying and lowering unnecessary cost burdens to meet certain development standards can increase housing stock and limit displacement in low-income neighborhoods. The Housing Action Plan identified some areas of focus (e.g., parking). The 2023 Middle Housing Grant will uncover some code and permit process improvements.
Pol. HS 1.18 The City should advocate for additional funding at County, Federal, State, and other levels to expand programs that facilitate home ownership by low and moderate income families, and provide assistance for repair, rehabilitation, energy efficiency, and weatherization.	S	This policy specifically calls out renovations and improvements which can keep existing housing stock safe and alleviate displacement caused by adverse conditions within the home. The Housing Action Plan also recommended monitoring in reference to this policy.
Pol. HS 1.19 The City should ensure that affordable housing created or preserved using local public resources or by regulation retains its affordability over time.	A	No mechanisms listed, although these are anti-displacement outcomes Suggest the City provide more direction about requiring longer-terms for new affordable housing (RCW 36.70A.540), and strategies for housing at risk of losing covenants.
Pol. HS 1.20 The City should establish a process for measuring the effectiveness of policies and regulations in meeting the housing needs of Burien residents.	A	This is an administrative task and would help the City meet new 5-year Comprehensive Plan monitoring provisions. Adding metrics in the Housing Element implementation section could help the City use the tracking and data to inform new policies and regulations. Some recommended by the Housing Action Plan include monitoring naturally occurring affordable housing as well as subsidized housing. Other metrics could include tracking the development of middle housing in single family zones where it is added, housing developed with incentives, housing added in areas with accelerating gentrification and market prices versus other areas with less pressure.
Pol. HS 1.21 The City should create a Demonstration Housing Program to test innovative residential designs that would encourage affordable housing production. The pilot program should test alternative development standards that increase the diversity of housing types and levels of affordability.	S	This policy is already in place and serves each criterion of the rubric. The pilot program has been initiated and extended. If the pilot program is made permanent this policy should be amended. Lessons learned could help the City adapt the program (e.g., as a floating zone?).
Pol. HS 2.1 Burien's plans and regulations should facilitate home ownership and rental opportunities for all economic segments of the community.	S	Meets all criteria of the rubric and serves all income levels. The City could call out strategies such as middle housing. More specifics will be part of the Comprehensive Plan Update as the City identifies how it will meet housing growth targets by income band.
Pol. HS 2.2 The City's existing housing stock should be conserved through:4-4 a. Code enforcement; b. Appropriate zoning; c. Supporting the maintenance, soundproofing, weatherization, rehabilitation, and long-term preservation	A	Suggest at least one bullet point that addresses preserving the affordability of existing housing stock.

Policy	Initial Evaluation	Rationale
of existing housing, especially for low and moderate-income citizens; d. Discouraging conversion to inappropriate nonresidential uses.		
Pol. HS 2.3 Development standards and regulations for single family areas should avoid unnecessary barriers to the renovation and improvement of homes in established neighborhoods built to past standards.	S	This policy specifically calls out renovation and improvements which can keep existing housing stock safe and alleviate displacement caused by adverse conditions within the home.
Pol. HS 2.4 The City should give special attention to improving the quality of low income neighborhoods and seek to implement programs which encourage rehabilitation of deteriorating structures and facilities in such neighborhoods.	S	This policy specifically calls out infrastructure needs and associated anti-displacement outcomes of this work.
Pol. HS 2.5 The city should consider established housing targets when evaluating land use designation changes.	S	This is conscious work to increase the housing stock through land use change. More specifics will be part of the Comprehensive Plan Update as the City identifies how it will meet housing growth targets by income band.
Pol. HS 2.6 As necessary evaluate the performance of multifamily zoning designations and adjust development standards to increase efficient use of land.	A	Similar to Policy HS 1.20 but provides an outcome that can update zoning to increase du/acre in multifamily zones. The City could add performance of single family zones to address exclusion in RS zones. These may become low density zones that allow middle housing types on lots with certain characteristics (e.g., sizes, access to alleys or transit, and other).
Pol. HS 2.7 The City should pursue adopting strategies and regulations where needed which will address minimizing and mitigating the negative impacts of short term rentals such as increased home and rental costs, displacement of long term rental housing stock, traffic and parking concerns and public health and safety impacts.	S	Short-term rentals can remove units from the long-term rental supply and increase housing costs if the area is popular with tourists, unless strictly regulated.
Pol. HS 3.1 Equal access to housing should be ensured for all people, without regard to special need, race, creed, color, national origin, religion, sex, family status, or disability honorably discharged veteran or military status, sexual orientation, or the presence of any sensory, mental, or physical disability or the use of a trained dog guide or service animal by a person with a disability, participation in Section 8 voucher program or other similar government housing subsidy programs.	S	This policy calls out specific protected classes at risk of displacement and is targeted in ensuring equal housing access for these citizens
Pol. HS 3.2 The City should implement non-discriminatory zoning regulations for group homes that is consistent with the Federal Fair Housing Act, enabling4-5 The Burien Plan 2 - 66 October 22, 2021 different classes of group homes to be permitted in appropriate residential neighborhoods.	S	This policy meets the criteria listed in the rubric while ensuring the City's compliance with other federal regulations. More specifics around housing for special needs may be appropriate due to newer targets.
Pol. HS 3.3 The City should encourage the dispersal of special needs and senior housing throughout the City. However, special needs and senior housing must still meet the development requirements of the underlying zone. Some clustering of special needs and senior housing may be appropriate if proximity to public transportation, medical facilities or other essential services is necessary.	A	In accommodating protected classes listed in this policy there is the potential for displacement of other low-income and non-White communities based on the caveat of proximity to services and the racial and economic demography of communities shown in Exhibit 37.

Policy	Initial Evaluation	Rationale
Pol. HS 3.4 In coordination with other local and regional agencies, the City should support and plan for assisted housing opportunities using available federal, state, and county resources.	S	This policy addresses potential partners and additional funding sources to meet the housing needs of low- and moderate-income residents.

Land Use Element Review

Policy Review

Using a similar rubric Exhibit 59, Land Use Element policies were examined. Exhibit 60 applies the evaluation framework across policies in the existing Burien Comprehensive Plan's Land Use Element.

Exhibit 59: Land Use Policy Evaluation Framework

Criteria	Evaluation
The policy is valid and supports achieving the GMA goal for land use. There is a need for the policy and/or it addresses identified racially disparate impacts, environmental management strategies.	"S" Supportive
The policy can help achieve the GMA goal for the land use but may be insufficient or does not specifically address racially disparate impacts or certain mandatory components of a comprehensive plan land use element.	"A" Approaching
The policy may challenge the jurisdiction's ability to achieve the GMA goal for land use. 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 or environmental degradation.	"NA" Not Applicable

Exhibit 60: Findings for Land Use Element

Policy	Initial Evaluation	Rationale
Pol. LU 1.4 Encourage a mix of residential, office and commercial uses within Burien's Urban Center to create a vibrant city center that reduces reliance on the automobile and provides a range of housing opportunities.	A	This is a strong policy with a clear land use goal that meets the stated GMA goals for land use; the City could strengthen it by identifying priority locations and approaches to reduce or mitigate the risk of displacement especially since Urban Center zoning will be an implementation item for the Comprehensive Plan Update.

Policy	Initial Evaluation	Rationale
Pol. LU 1.5 Expand Burien's economic base by attracting the types of economic activities that best meet the needs and desires of the community, while protecting well-established residential areas from encroachment by incompatible non-residential uses.	A	The term "well established residential areas" is vague and does not specifically call out what types of areas would be protected from this encroachment. Most commercial areas allow for mixed use.
Pol. LU 1.6 Encourage redevelopment and development of underutilized and vacant land to be compatible with the envisioned character, scale and design of surrounding development.	A	"Envisioned character" is a broad term that could potentially lead to racially disparate impacts based on current conditions in Burien.
Pol. LU 1.7 The city will strive to ensure that basic community values are reflected in the City's land use and decision making processes, while recognizing the rights of individuals to use and develop private property in a manner consistent with City regulations.	A	This policy would be improved with reference to specific community values. This could include increasing economic opportunities while considering displacement and opportunities to avoid or mitigate for it.
Pol. LU 1.11 Downtown Burien and surrounding areas have been designated a regional growth center in accordance with Vision 2040 and the King County Countywide Planning Policies. The boundaries of the Urban Center are shown on Figure 2-LU1.11 Urban Center Boundary).	S	This policy is straightforward and does not present any risk of racially disparate impacts. The policy could be amended to reference VISION 2050.
Pol. LU 2.1 Accommodate growth targets for the planning period ending in 2035 as shown in Table 2-LU 2.1 (Countywide Growth Targets 2006 to 2035). Implement appropriate zoning regulations and develop infrastructure to support growth represented by the targets, to the extent that market forces will allow.	A	A good policy that reflects the need for zoning and infrastructure adaptations to accommodate growth targets. The policy needs update to reference 2044 growth targets including by income band. The phrase "market forces" is vague and may hinder the City's ability to reach the stated goal of this policy.
Pol. LU 2.2 Provide sufficient land area and densities to meet Burien's projected needs for housing, employment and public facilities (Ordinance No. 701, December 2018).	S	This policy meets the criteria of the land use element rubric.
Pol LU 2.3 Zone sufficient buildable land, create adequate usable development capacity and allow for an appropriate mix of housing types to accommodate not less than Burien's projected share of King County population growth over the next 20 years (Ordinance No. 701, December 2018).	A	Meets criteria of land use element, directly states it will create capacity for mix of housing types which can alleviate displacement risks and racially disparate impacts. The policy needs update to reference housing targets including by income band. It could also identify the housing capacity may come from all residential and mixed zones including single family zones.
Pol LU 2.4 Ensure that any rezoning results in an overall increase in residential capacity and/or employment targets and will contribute toward the City being able to achieve its population, housing and employment targets under the Growth management Act and King County Planning Policies (Ordinance No. 701, December 2018).	A	This policy is clear in intent to meet targets. It could be updated to reference income-based targets as well as linking increases in capacity to affordable housing incentives or inclusionary zoning as a sub-policy, as well as allowing a variety of affordable business space in terms of jobs.
Pol LU 2.5 Establish minimum density standards in targeted areas to discourage underdevelopment of land resulting in reduced capacity for housing and jobs.	S	This policy meets the criteria of the land use element rubric. Minimum density has strong anti-displacement outcomes in terms of increasing housing stock in urban centers or other nodes/corridors.
Pol. RE 1.2 The planned densities for single family development should encourage a lower development potential in areas with development constraints.	C	Given City critical area regulations and opportunities for clustering lower densities are not necessary unless the critical areas are of high rank order and rarity per GMHB cases.
Pol. RE 1.3 Any existing single-family lot that was legally subdivided or legally created prior to enactment of subdivision statutes prior to incorporation or annexation shall be considered a legally conforming	C	This level of specificity regarding developing on legal lots should be reconsidered. Adding more housing types and sizes could help legal lots be

Policy	Initial Evaluation	Rationale
lot for building p urposes, providing the size of the lot was not reduced by more than 50 percent through acquisition for public purposes, and on such lots new homes may be built and existing houses may be expanded and remodeled, provided that applicable setbacks, lot coverage, critical area restrictions, design review requirements (if any), height limits and other applicable regulations in the zoning code are met.		developed with reasonable and quality uses. Suggest addressing what is a legal lot in City code. Building on a legal lot means meeting City standards.
Pol. RE 1.5 The Low Density Residential Neighborhood designation will provide for low-density residential development. Development within this designation includes existing neighborhoods that are zoned for four units per net acre or less. …	C	Suggest modifying designation criteria to refer to low density residential rather than solely single family. Ensure criteria limiting based on critical areas is reflective of WAC 365-196-300, and considers opportunities for clustering. Consider consolidating single family residential districts into low density residential with a range of densities (e.g., 4-8 units) including smaller lots for detached and attached single-family housing. This could assist with flexibility in underlying zoning and allow more middle housing in appropriate locations to increase housing ownership opportunities.
Pol. RE 1.6 The Moderate Density Residential Neighborhood designation allows single family residential uses at a maximum density of six dwelling units per net acre. Accessory and non-residential uses that are compatible with a moderate density residential area may also be allowed. This designation is implemented by the RS-7,200 zoning category.	C	Similar suggestions as above regarding RE 1.5.
Pol. RE 1.7 The Low Density Multifamily Neighborhood designation allows multiple- family residential uses at a maximum density of 12 units per net acre. Accessory and non-residential uses that are compatible with a low density multi-family area may also be allowed. This designation is implemented by the RM-12 zoning category. …	A	Consider consolidating with Moderate Density Multifamily and allowing a range of densities to be determined underneath in zoning.
Pol. RE 1.8 The Moderate Density Multifamily Neighborhood designation allows multiple-family residential uses with a density range of 18 to 24 units per net acre. Accessory and non-residential uses that are compatible with a moderate density multi-family area may also be allowed, including offices in a mixed-use development. This designation is implemented by the RM- 18 and RM-24 zoning categories. …	S	This policy supports a range of densities and styles.
Pol. RE 1.9 The High Density Multifamily Neighborhood designation allows multiple- family residential uses with a density of 48 units per net acre. Accessory and non-residential uses that are compatible with a high density multi- family area also may be allowed, including offices in a mixed use development. This designation is implemented by the RM-48 zoning category. …	A	Consider if adjusting density ranges would be appropriate given results of Ambaum Boulevard Park Subarea Plan (ABP) proforma.
Pol. BU 1.3The Neighborhood Center designation allows for relatively small areas that provide limited scale convenience goods and services to serve the everyday needs of the surrounding single family neighborhoods or to provide locally based employment opportunities, while protecting the desired neighborhood character. Mixed use development up to 12 dwelling units per acre is allowed at these locations. Mixed use developments contain a commercial or office presence while also providing opportunities for people to live near services and/or a choice of transportation modes. These neighborhood focal points should be designed and located so that	A	Consider consolidating commercial designations in Comprehensive Plan and allowing stand-alone residential if meeting criteria (e.g., transition use; part of horizonal mixed use block, or other).

Policy	Initial Evaluation	Rationale
customers and employees are encouraged to walk rather than drive to these areas. This Comprehensive Plan land use designation is implemented by the Neighborhood Center zoning designation. …		
Pol. BU 1.4 The Intersection Commercial designation allows for a variety of commercial uses of low to moderate density or intensity, located at major roadway intersections in close proximity to higher density uses, such as multifamily developments. Multifamily development in these areas may only be approved as part of a mixed use development with the appropriate unit density being based on the adjacent comprehensive plan land use designations. Customers are anticipated to either drive or walk to these establishments. This Comprehensive Plan land use designation is implemented by the Intersection Commercial zoning designation. …	A	Consider if this designation is needed if ABP designations are implemented.
Pol. BU 1.5 The Downtown Commercial designation fosters a vibrant, compact, pedestrian oriented area by allowing high density residential development, office, retail and commercial uses, government activities, and restaurants, entertainment and cultural uses. Mixed use developments are encouraged, including well-designed townhouses and condominiums, providing a convenient living environment and making the downtown a community focal point and center, as well as a lively place in the evening and on weekends. Residential densities are limited only by physical constraints such as height, bulk, parking and infrastructure capacities. Moderate to high rise buildings, pedestrian amenities and facilities that help define downtown Burien's distinctive qualities are encouraged. …	A	Update as appropriate to reflect Urban Center Plan and pending Urban Center zoning. Consider removing map of heights in Comprehensive Plan and addressing in code. Expand designation where appropriate on corridors.
Pol. BU 1.7 The Community Commercial designation recognizes the business orientation of some of the principal arterials, including Ambaum Boulevard Southwest, Boulevard Park and the Five Corners area. The designation allows moderate intensity commercial uses that serve the community. Customers would likely access these establishments by automobile or by transit. The range of allowed uses includes moderate intensity retail activities, professional offices, restaurants, entertainment, and services. Multifamily development in these areas may only be approved as part of a mixed use development with the appropriate unit density being based on the intensity of adjacent comprehensive plan land use designations. Business uses should be located on the ground floor. This Comprehensive Plan land use designation is implemented by the Community Commercial 1 and Community Commercial 2 zoning designations. …	A	Consider consolidating commercial designations in Comprehensive Plan and allowing stand-alone residential if meeting criteria (e.g., transition use; part of horizonal mixed use block, or other).
Pol. BU 1.8 The Regional Commercial designation allows larger scaled commercial uses that serve the community, the region, and the traveling public. These uses are typically land extensive, and are not well-suited to being located downtown. This classification is currently found along 1st Avenue South and provides locations for retail uses that require large sites, automobile sales and services, restaurants and services for travelers. Multifamily development in these areas may only be approved as part of a mixed use development with a maximum of 24 units per acre. Business uses should be located on the ground floor and minimum gross floor area standards for floor area devoted to business uses shall be established to maintain a predominate commercial presence. This Comprehensive Plan land use designation is implemented by the Regional Commercial zoning designation. …	A	Consider consolidating commercial designations in Comprehensive Plan and allowing stand-alone residential if meeting criteria (e.g., transition use; part of horizonal mixed use block, or other).
The Professional Residential designation provides flexibility by allowing both single-family homes and small businesses in an area near but not directly under SeaTac International Airport's third runway. …	S/A	This designation was applied in NERA after an EIS and master plan process. As part of Comprehensive Plan Update with more recent VISION 2050 (PSRC) and Countywide Planning Policies regarding

Policy	Initial Evaluation	Rationale
		environmental justice, the City can review and consider appropriate location/style of housing.
Pol. OF 1.1 The Office designation should recognize existing office uses and encourage office uses in appropriate areas, based on the criteria below. The Office land use category allows low to moderate density office, medical and medical-related uses, research and development, day care centers, eating and drinking establishment, personal and professional services, and public and semi-public uses. Mixed use development, combining office, retail, commercial and residential uses is also permitted. Multifamily development in these areas may only be approved as part of a mixed use development with the appropriate unit density being based on the adjacent comprehensive plan land use designations. This Comprehensive Plan land use designation is implemented by the Office zoning designation.	A	Consider consolidating commercial designations in Comprehensive Plan and allowing stand-alone residential if meeting criteria (e.g., transition use; part of horizonal mixed use block, or other).

Goals Review

The City of Burien has stated that the policies listed in the above table will help them achieve the following goals related to land use:

> *"Goal LU.1*
>
> *Establish a development pattern that is true to the vision for Burien by supporting the neighborhoods and preserving the character of the well-established neighborhoods as defined by the Neighborhood Plans, enhancing the attractiveness and vitality of the downtown core, and preserving the City's small town character."*
>
> *"Goal LU.2*
>
> *Plan for Burien's share of regional growth consistent with state and regional goals directing growth to urban areas."*
>
> *"Goal RE.1*
> *Provide a variety of attractive, well-designed housing choices that reinforce the character of the neighborhoods and meet the needs of existing and future City residents."*

While most of the evaluated policies can support these goals, the coded language related to "well-established neighborhoods" and "small town character" in Goal LU.1 can result in inequitable distribution of land use changes. Based on this goal, certain communities will be deemed too "well-established" for land use changes based on Neighborhood Plans that will be incorporated into the Burien Comprehensive Plan while others will not. Development of these plans require community

input and administrative knowledge that underserved communities may not have the capacity to provide which may result in further displacement within certain communities that are already at risk for displacement and less displacement in well-resourced neighborhoods.

Community Character Element Review

The Community Character Element addresses the visual and environmental character of Burien including residential districts, downtown, and streets. As it is a lengthy element the evaluation is presented based on the overarching goals of the element with references to example policies. The evaluation framework is shared in Exhibit 61. Results are shared in Exhibit 62.

Exhibit 61: Community Character Policy Evaluation Framework

Criteria	Evaluation
The policy is valid and supports achieving GMA goals. There is a need for the policy and/or it addresses identified racially disparate impacts.	"S" Supportive
The policy can help achieve GMA goals but may be insufficient or does not specifically address racially disparate impacts.	"A" Approaching
The policy may challenge the jurisdiction's ability to achieve GMA goals. 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 goals and has no influence or impact on racially disparate impacts.	"NA" Not Applicable

Exhibit 62: Findings for Community Character Element

Policy Goals	Initial Evaluation	Rationale
Goal VQ.1 Ensure a quality visual environment through appropriate design standards and procedures.	C	The policies meant to achieve this specific goal have the possibility to disproportionately impact neighborhoods that already have multi-family dwellings. Specifically, Policy VQ 1.2 to establish a design review process can be used by opponents to stifle development and further housing stratification if the process and criteria are overly cumbersome. The ability to avoid undue process is under review as part of the Middle Housing Grant.
Goal EQ.1 Recognize the significant role that the natural environment plays in creating a healthy and attractive community.	S	This goal is met by the policies and ensures that the natural environment and natural beauty that is present in the city is conserved and maintained along with projected growth. There are no policies that are associated with this goal that could result in Racially Disparate Impacts. The City's critical area regulations protect the environment. Density does not have to be restricted to meet critical area protection (e.g., clustering and compact building footprints can avoid critical areas as can be seen in the west side of the community where there are ravines).
Goal EQ.2 Engage with the community in enhancing and sustaining a healthy, sustainable urban forest to strengthen climate resilience and protect Burien's natural resources for current and future generations.	S	This goal only has one nested policy, and this policy satisfies the criteria of the rubric. For equity purposes enhancing tree canopies in parking areas and rights of way can benefit all especially in areas with lower tree equity scores.

Policy Goals	Initial Evaluation	Rationale
Goal NQ.1 Reinforce and enhance the City's neighborhoods.	C	The policies listed have relatively vague language related to community character. These policies may exacerbate racially disparate impacts that already exist in a neighborhood including by perpetuating existing conditions. The development of neighborhood plans is also vague and if certain plans require dedicated input from community members, communities with better access and administrative knowledge will be better suited to develop a robust neighborhood plan. However, there are some strong policies related to traffic and pedestrian movement nested beneath this goal.
Goal NP.1 Continue to provide the residents of the City with stable and quiet residential neighborhoods by maintaining an adequate residential tax base and assuring that: • Residential neighborhoods are protected from undue adverse impacts associated with incompatible land uses or transportation facilities, including, but not limited to, noise, air and water pollution, glare, excessive traffic and inadequate on-street parking; • Residential neighborhoods are identified and protected from detrimental exterior noise levels; • Residential streets are protected from heavy commercial traffic that inhibits the free flow of traffic or that exceeds prescribed weight limits.	A	The goals and policies listed here meet the criteria of the rubric and most will likely alleviate racially disparate impacts especially in residential corridors near urban centers and major thoroughfares. These policies would be aided by including mention of multifamily and mixed-use residential/commercial neighborhoods and how to alleviate the undue adverse impacts listed in the goal in these communities. Addressing means to reduce air quality and noise impacts due to site and building design, green infrastructure, and other would be helpful.
Goal RC.1 Support and enhance existing nodes of small-scale commercial uses within neighborhoods that provide access to convenience goods and services that serve the everyday needs of the surrounding neighborhood, while protecting neighborhood character.	S	This goal and the nested policies support equitable distributions of complete mixed use neighborhoods that include small scale commercial space.
Goal DB.1 Enhance the distinctive character and viability of downtown Burien, and reinforce it as the focal point of the community by encouraging the implementation of the Downtown Master Plan and the following downtown policies.	A	The goal and relevant policies could reference the Urban Center plan. It is predominantly a mixed use district plan to increase access and vitality in the center. There are mentions of some mixed use and owner-occupied developments in Pol DB 1.24. Generally, the downtown Burien policies meet the criteria of the rubric and are necessary to achieve GMA goals.
Goal DB.2 Recognize urban design principles which promote quality development and reinforce the City's identity in the downtown core and implement these principles in the design of both public and private development.	C	Most of these policies are design guidelines that will be reviewed under the Middle Housing Grant and Urban Center zoning implementation. There are some policies that include standards that could be modified (e.g., when a site must meet design standards at 50% change in value) leaving specifics to the code. Some policies address a "harmonious blend of colors" or other terms that give a sense of direction but are somewhat vague.
Goal SC.1 Develop a fully integrated local street system which accommodates various transportation modes depending upon individual neighborhood characteristics, and creates streetscapes that enhance neighborhood quality and help develop a strong sense of community.	A	There is coded language in what "small town character" connotes in Pol SC 1.2. The City could consider explicit policies on how improved streetscapes will be distributed equitably throughout the city. Other policies such as improving pedestrian access and pedestrian experience will help achieve GMA goals. Suggest having policies nested within this goal to incorporate streetscapes and transit corridors to connect residential and mixed use areas to public transportation
Goal RM.1 Provide flexibility in the regulation of land use and development, and accent performance standards that address the specific impacts of development.	S	The goal and associated policies are meant to alleviate negative impacts of industrial zones on adjacent residential zones which serves to alleviate certain inequitable impacts of existing development.
Goal HC.1 Burien promotes and supports the health of all community members through healthy and active planning for physical activity and nutrition.	N/A	While this public health policy is important for the city, it does not directly relate to the community character criteria. These goal could be achieved by incorporating policies related to food desert alleviation or other related public health concerns that may be related to urban design. This can be explored in the Comprehensive Plan Update.

As part of the Middle Housing Grant and Comprehensive Plan Update, other elements will be reviewed for coded language and potential conflicts with desired outcomes of this RDI process:

- Transportation Element
- Utilities Element
- Parks, Recreation, and Open Space Element
- Storm Water Element
- Capital Facilities Element
- Essential Public Facilities Element
- Economic Development Element
- Neighborhood Plan Element
- Sustainability Element

Recommendations

This evaluation reviewed the Housing, Land Use, and Community Character elements of the Comprehensive Plan in relation to the following questions:

- 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?

The results highlighted some overall adjustments that could increase inclusion and reduce disparate impacts, such as:

- Strengthening policy language to protect naturally occurring affordable housing. This type of housing is found throughout Burien, and particularly long-standing apartments along corridors well as with numerous multiplexes (fourplex in particular).
- Promoting single family areas as locations where affordable and varied housing choices are a focus, e.g., middle housing. This includes allowing townhouses (e.g., fee simple or otherwise), multiplexes (duplex, triplex, fourplex), and small apartments to meet HB 1220 provisions to address moderate density housing. This also means continuing to allow and refine accessory dwelling unit requirements.
- Consolidating some residential designations for flexibility in underlying zoning, densities, and housing styles. Consolidating some commercial and mixed use designations and adjusting restrictions on housing as part of mixed use only.

- Amending vague language around design and character. Without clarity this could impede allowing new forms of housing and create barriers in permitting. Clear standards for quality and healthy homes are important.
- Referencing newer housing targets by income band and special needs. This is now proposed in Countywide Planning Policies and differs from the shares expected in the HAP.

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