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State of Idaho

Analysis of Impediments to Fair Housing Choice

PREPARED FOR:

Idaho Housing and Finance Association
Idaho Commerce

CREATED

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PRIMARY FINDINGS, IMPEDIMENTS TO FAIR HOUSING CHOICE, FAIR HOUSING ACTION PLAN

State of Idaho

2022-2027 ANALYSIS OF IMPEDIMENTS (AI) TO FAIR HOUSING REPORT

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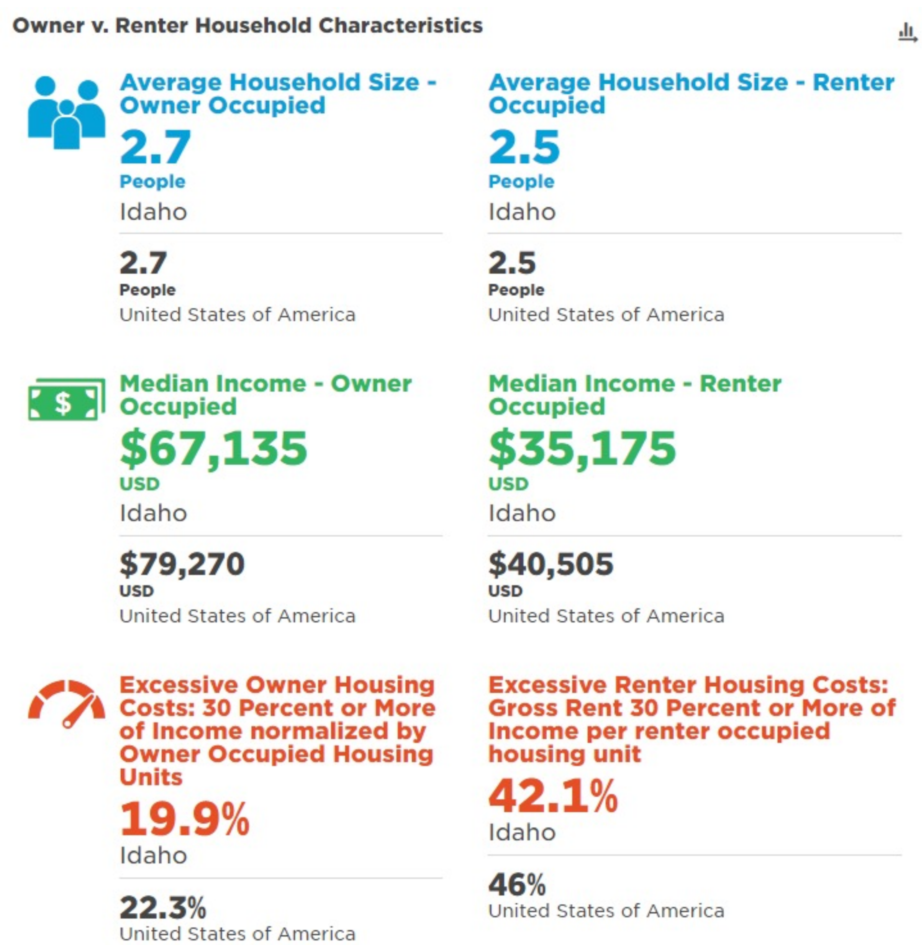
Analysis of Impediments (AI) components

- Identify the state’s greatest housing needs and how these have changed during the past five years;
- Examine how the state’s economy has changed and what those changes mean for Idahoans’ economic stability
- Pinpoint the resident groups with the greatest housing needs
- Identify private sector actions and public sector regulations that interfere with housing choice
- Develop a plan for responding to barriers in housing choice and economic opportunity

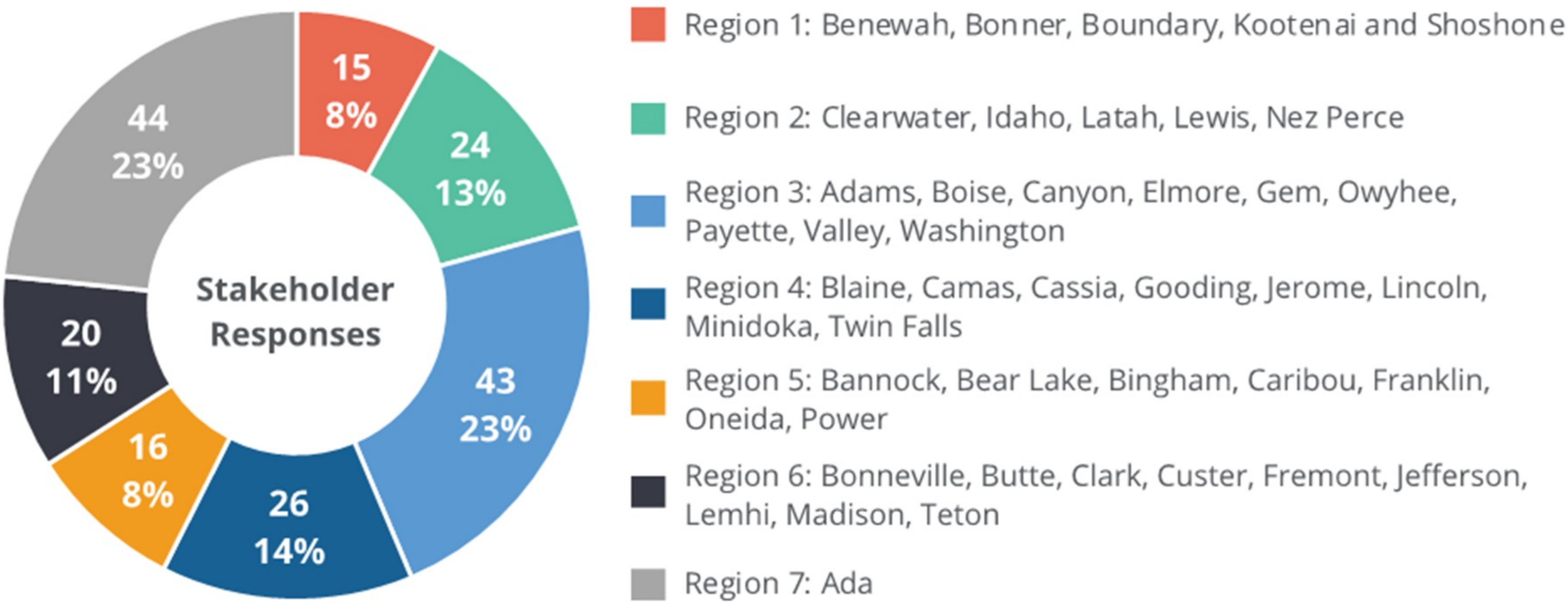
Data Dashboard

The key data elements of this study can be easily accessed online, at this link:

https://reports.mysidewalk.com/209b1e773e

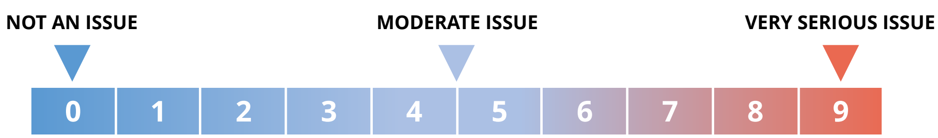


COMMUNITY ENGAGEMENT



STAKEHOLDERS' TOP RANKED NEEDS

Stakeholder Survey Housing Challenges Rating Scale



- Affordable housing for people with disabilities leaving institutional settings
- Affordable rental housing near transportation
- Affordable child care
- Affordable rentals near employment centers
- Preservation of low cost, market rate affordable housing
- More diversity in housing types and price points
- Affordable, integrated housing for residents needing supportive services
- Affordable rental housing near strong schools

Source: Root Policy Research

Resident Engagement

Virtual focus groups were held with:

- Advocates in the disability community;
- Advocates in and for the refugee community;
- Low income households and households experiencing homelessness;
- Hispanic residents;
- Advocates for racial inclusion; and
- Advocates for sexual orientation and gender identity inclusion

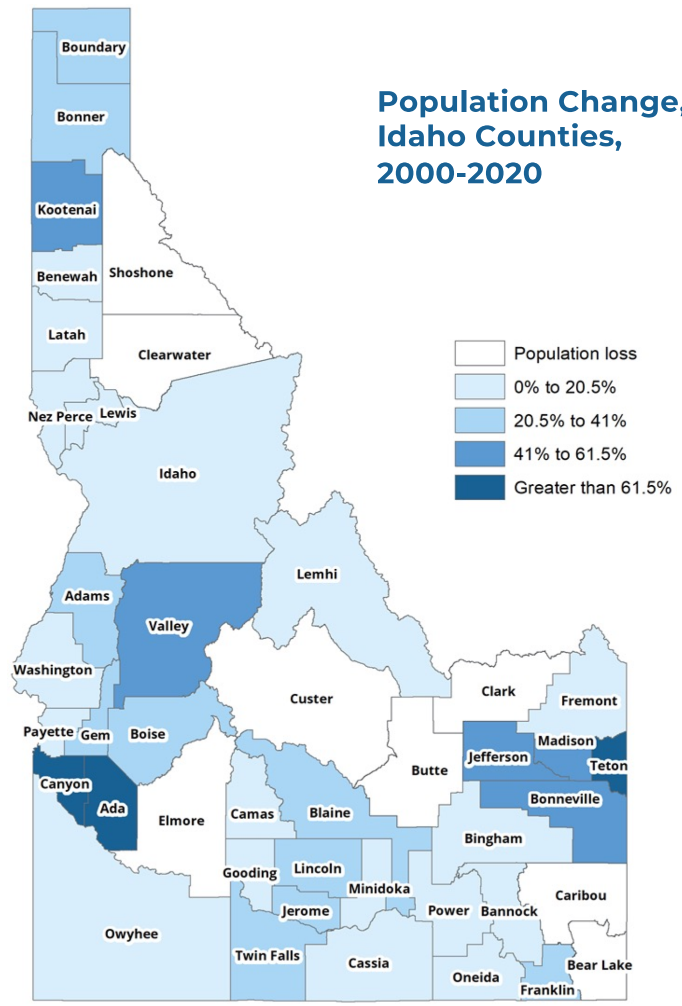
PRIMARY FINDINGS

DEMOGRAPHIC CHANGES HAVE BEEN MODEST

- The State of Idaho's population has **almost doubled since 1990.**
- The state's resident base has become **slightly more diverse racially and ethnically.** However, the strongest growth in numbers has remained in White, non-Hispanic residents.
- Residents in Idaho are aging; **14% of Idahoans report having a disabling condition.**

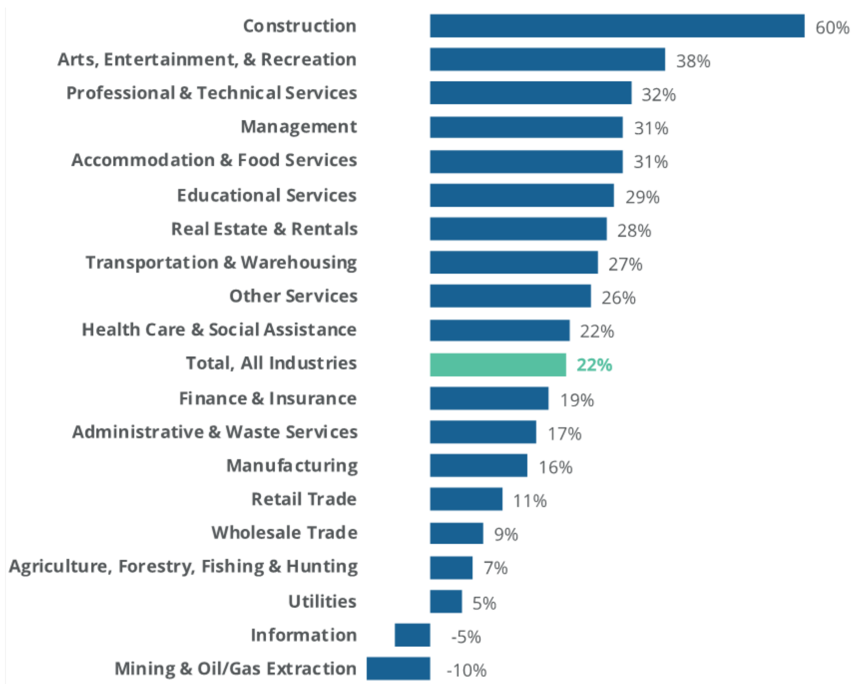
Source: Root Policy Research

Population Change, Idaho Counties, 2000-2020



ECONOMIC GROWTH HAS BEEN ROBUST — AND COULD BENEFIT MORE IDAHOANS

Job Growth and Decline, State of Idaho, 2013-2019



- Over the last 20 years, **the state's economic growth, as measured by GDP, has been consistently strong** (62% growth).
- The state's economic expansion created many new jobs — **but mostly in lower-paying industries.**
- **Low-wage jobs** dominate Idaho's economic landscape.

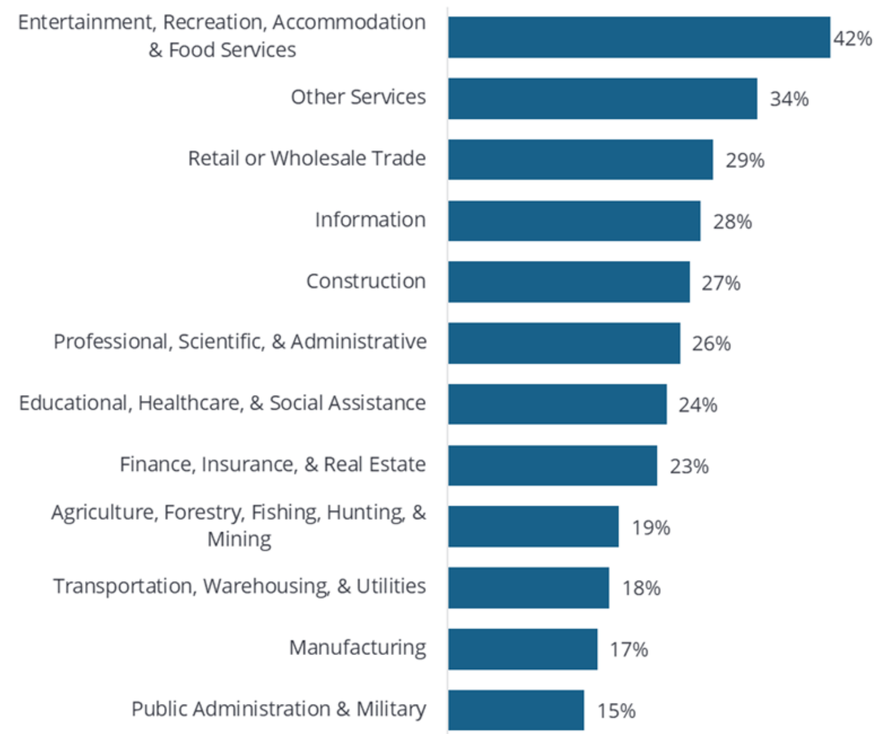
Source: Root Policy Research

ECONOMIC GROWTH HAS BEEN ROBUST — AND COULD BENEFIT MORE IDAHOANS

- Idaho's economic growth has led to a significant drop in poverty — **from 15.6% in 2014 to 11.2% in 2019.**
- **The state's economic growth strengthening has not benefitted residents equally** — particularly for low income residents and residents with disabilities.
- The industries where jobs are growing the fastest are those where housing cost burden is the highest .

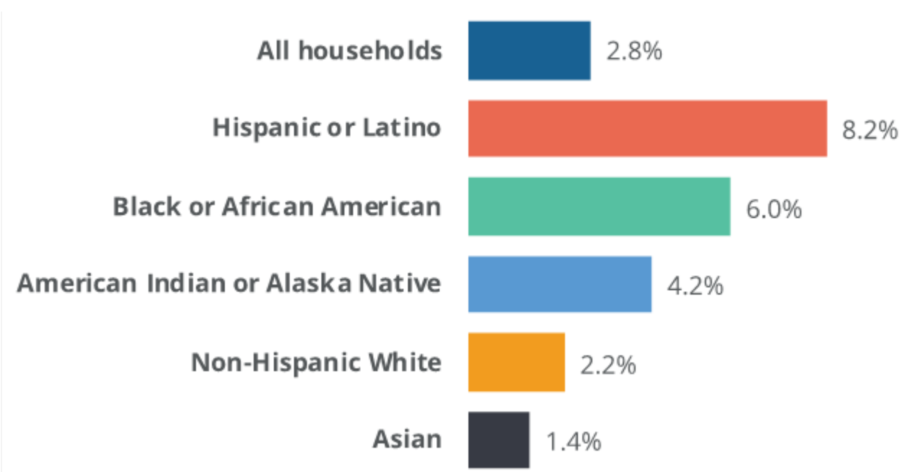
Source: Root Policy Research

Cost Burden by Industry, State of Idaho, 2019



HOUSING NEEDS PERSIST— AND DISPROPORTIONATELY AFFECT PERSONS WITH DISABILITIES, RACIAL/ETHNIC MINORITY HOUSEHOLDS

Overcrowded Households by Race and Ethnicity, State of Idaho, 2019



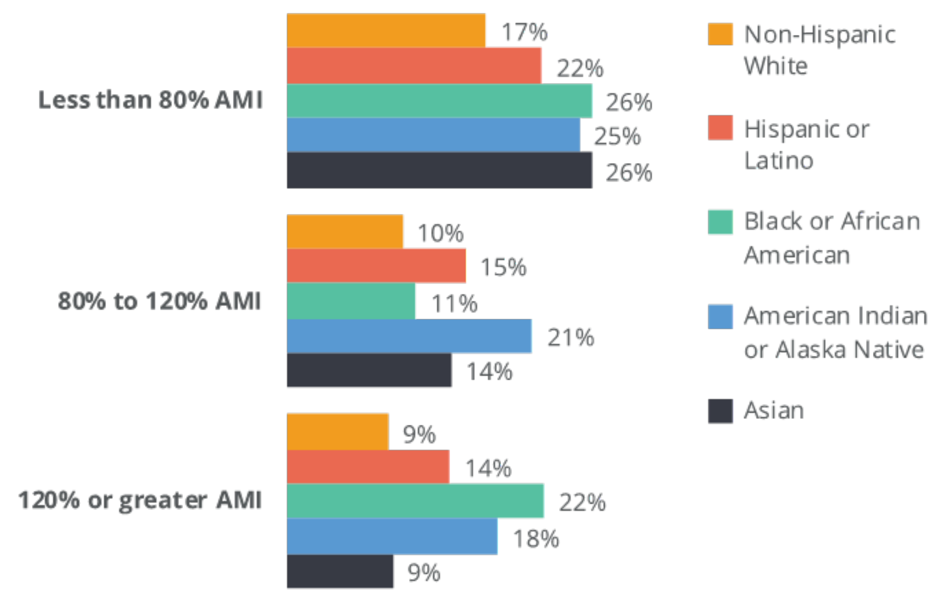
- Around 6% of Idaho's population has an ambulatory disability but **less than 1% of the housing stock is estimated to be accessible.**
- Idahoans with a disability are more likely to live in housing that is in **substandard condition, live in overcrowded housing, and face cost burden** than those without disabilities.
- **African American and Native American homeowners** face the highest rates of housing cost burden among homeowners in the state.

Source: Root Policy Research

HOUSING NEEDS PERSIST— AND DISPROPORTIONATELY AFFECT PERSONS WITH DISABILITIES, RACIAL/ETHNIC MINORITY HOUSEHOLDS

- African American, Native American, and Hispanic households are **two to four times more likely** to live in overcrowded conditions than Idahoans overall.
- **71% of White Idahoans own** their homes compared to **just 38% of African American households** and about half of Native American and Hispanic households.
- African American, Native American and Hispanic applicants for mortgage loans are **denied loans 1.5 to 2 times greater than White, non-Hispanic applicants.**

Denial Rates by Race and Ethnicity & Income, State of Idaho, 2019



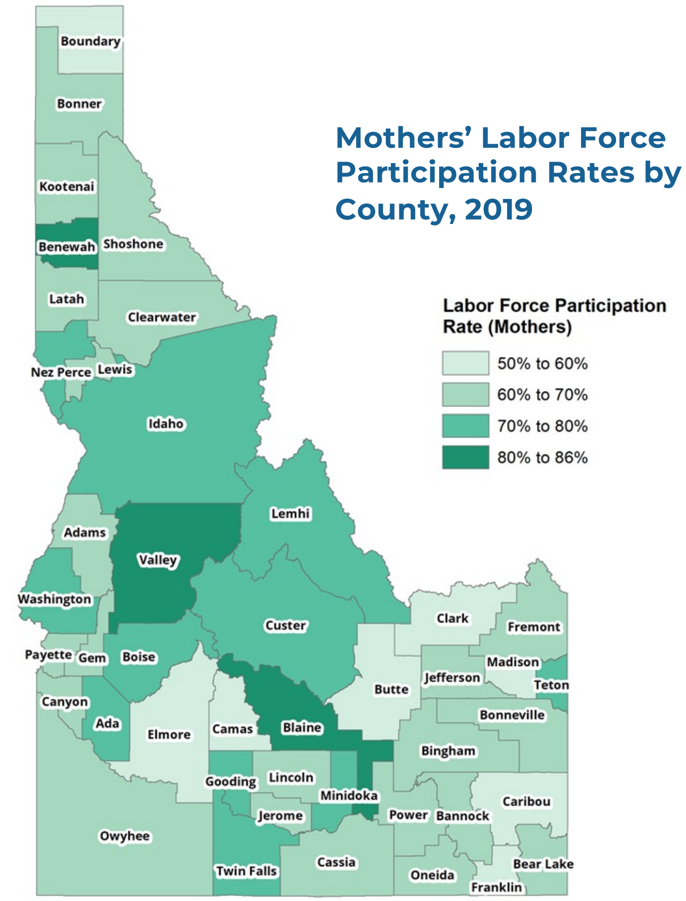
Source: Root Policy Research

HOUSING INSTABILITY COULD THREATEN FUTURE ECONOMIC GROWTH

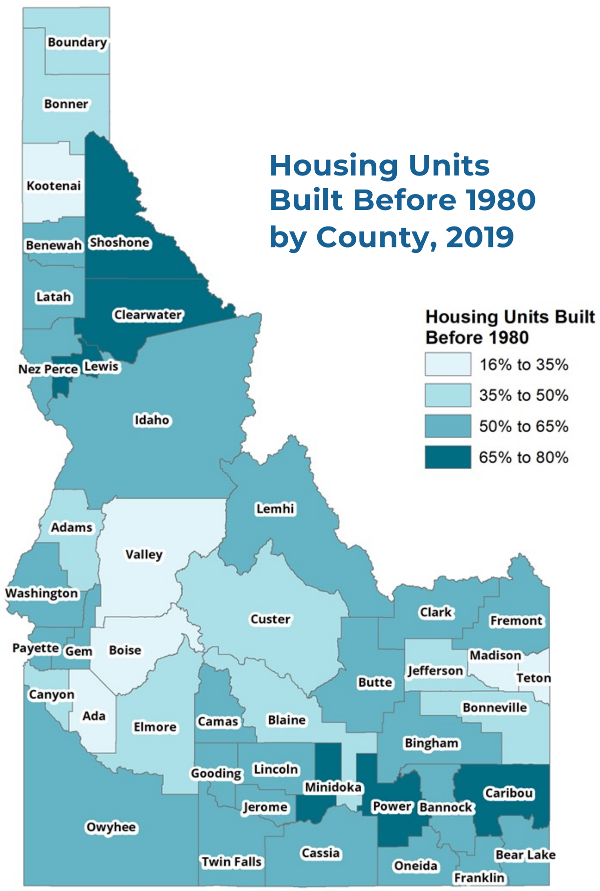
- The state has a relatively low labor force participation rate by women with young children.
- Foreign-born workers are more likely to participate in the workforce than U.S.–born workers. They also face significant housing challenges.
- Overall, 25% of the state's jobs pay less than what is needed to afford basic housing.
- The inability of employers to attract and retain workers threatens continued economic growth.

Source: Root Policy Research

Mothers' Labor Force Participation Rates by County, 2019



IDAHO'S REGULATORY STANCE ON LAWS AFFECTING AFFORDABLE HOUSING COULD BE IMPROVED TO FACILITATE HOUSING CHOICE



- Idaho statutes (regulations governing land use, zoning, housing type and placement) **continue to be silent in many areas that affect residential development**; local governments primarily adopt these regulations.

- While this approach allows for flexibility, it leaves local governments vulnerable to fair housing challenges. Additionally, Idaho's "hands off" stance does little to encourage much-needed housing supply.

Source: Root Policy Research

COSTS OF HOUSING INSTABILITY

Cost burden exists when households pay > 30% of their incomes for housing. This reduces their inability to pay for other households goods and invest in local economies.

1 in 2
renters are cost burdened

1 in 4
homeowners are cost burdened

Reducing housing cost burden to zero **would have the potential to free up $971 million in household spending annually** that could be invested within Idaho communities.

Source: Root Policy Research

COSTS OF HOUSING INSTABILITY

By 2050,

21% **of households will have at least one member with a disability**

The chance that a single family home will be occupied by a person with a disability over time = 60%

Idaho has 102,000 *too few* homes with accessibility modifications compared to the number of residents who need them

Total cost to retrofit those homes to meet accessibility needs = $408 million

Savings from building accessible features into those home when built = $382 million

Sources: Smith, Stanley K., Stefan Rayer, and Eleanor A. Smith. "Aging and disability: Implications for the housing industry and housing policy in the United States." Journal of the American Planning Association ; Root Policy Research.

MOVING FORWARD

- The state is in a **sound position economically**;
- **Infusion of federal funding presents a unique opportunity** to invest in and leverage innovative and effective housing solutions;
- There is a growing concern among stakeholders that **housing challenges could impair long term economic growth**; and
- **Needs are at a more manageable level** with the state's overall decline in poverty.

SOLUTIONS

ADDRESS CONSEQUENCES OF LOW WAGES AND GAPS IN HOUSING COSTS

Addressing economic opportunity barriers: IHFA and Commerce Five-Year Action Items

- Continue to allocate CDBG to job creation and skill development activities in rural areas
- Communicate to foundations and other private sector partners the need for resources to improve access to affordable child care and ECE programs, especially for low-income and weekend/shift workers
- Continue to fund child care centers with CDBG and bolster awareness
- Continue to utilize and promote existing resources (WeCAN Peer Learning Network) to educate rural communities about innovative and effective responses to housing challenges

Addressing economic opportunity barriers: Stakeholder Recommend-ations

- Explore funding opportunities to expand transportation options, including shared shuttle programs, that serve low-income workers and persons with disabilities
- As opportunities allow, prioritize federal funding to expand public transportation services to include later and weekend transit hours on existing routes and where low-income workers need service the most

NARROW DISPARITIES IN HOUSING CHALLENGES AND CHOICE

Expanding housing options and choice: IHFA and Commerce Five-Year Action Items

- Continue preferences for housing persons with disabilities, elderly, and extremely low-income households in state housing grant awards
- Continue to include a preference for LIHTC applications that target very low- and extremely low-income households for permanent supportive housing to persons with disabilities and/or persons experiencing homelessness
- Continue to fund credit counseling and homeownership readiness programs and include bilingual options and affirmative marketing

Expanding housing options and choice: IHFA and Commerce Five-Year Action Items

- Continue to require that communities receiving housing awards, including tax credits, are taking meaningful actions to reduce fair housing discrimination and housing access barriers
- Continue to provide extra scoring points to CDBG grant applicants that have local fair housing protections equivalent to federal protections
- Explore a program that pairs “good tenant” education with 1st and last month’s rent and security deposit subsidies to landlords who accept voucher holders, tenants perceived as high risk, or those who do not meet traditional application requirements

Expanding housing options and choice: IHFA and Commerce Five-Year Action Items

- Continue and consider expanding scoring preferences in the QAP for LIHTC developments that prioritize accessibility, visitability, and adaptable features in design
- Continue scoring preferences for ADA improvements funded by CDBG and ensure grantees have updated ADA transition plans
- Consider providing additional HOME funds to projects that exceed fair housing accessibility requirements in multifamily construction to cover additional costs

Expanding housing options and choice: Stakeholder Recommend-ations

- Consider a program like Colorado's new 1271 grants that support planning and land use studies, innovative housing solutions, and infrastructure grants to support affordable housing
- Support state efforts to establish a recurring source of funding for affordable housing development and preservation

Expanding housing options and choice: Stakeholder Recommend-ations

- Implement a new fund or pool existing resources for: 1) Home modifications to enhance accessibility; 2) Incentivize newly built housing that is visitable and adaptable; and 3) Assist groups homes with financial stability and viability.
- Consider a program like Colorado's new 1271 grants and federal funds to increase housing density allowed around transportation corridors to expand accessibility around transit hubs

ENHANCE AFFORDABLE HOUSING PRODUCTION

Enhancing housing production: IHFA and Commerce Five-Year Action Items

- Continue education and outreach activities to local governments on economic opportunities created by housing affordability and equity, and explore best practices in land use and zoning to encourage diverse housing types and price points

Enhancing housing production: Stakeholder Recommend-ations

- Support legislative efforts or allow by-right affordable housing development and gentle density bonuses for affordable developments as long as they are compatible with the local government's comprehensive plan
- Support legislative efforts that expand local governments' ability to raise funds to expand housing choice

IMPROVE FAIR HOUSING KNOWLEDGE AND AWARENESS

Improving knowledge and awareness: IHFA and Commerce Five-Year Action Items

- Continue to require that CDBG awardees take efforts to support AFFH
- Continue to prioritize investments in fair housing education and outreach
- Prioritize fair housing law education for landlords, property managers, local government staff, and elected officials, and neighborhood associations
- Update and expand the AI Data Dashboard
- Continue to provide state leadership with information on the benefits of a substantially equivalent state fair housing act

Improving knowledge and awareness: **Stakeholder Recommend-ations**

- Consider pursuing funding for a management consultant or mediator to work through tensions between fair housing organizations, housing providers (landlords, business owners, affordable housing providers), and local governments, with the goal to establish best practices

Executive Summary: Idaho Analysis of Impediments to Fair Housing Choice

This study—the Analysis of Impediments to Fair Housing Choice, or AI—examines barriers to housing choice in the State of Idaho. This study is a joint effort between the Idaho Housing and Finance Association (IHFA) and Idaho Commerce (Commerce).

The study was conducted to:

- Identify the state's greatest housing needs and how these have changed during the past five years;
- Illustrate the role of housing choice and diversity in Idaho's overall economic and employment health;
- Pinpoint the resident groups with the greatest housing needs;
- Identify private sector actions and public sector regulations that interfere with housing choice; and
- Understand how housing choice affects residents' access to economic opportunity and state and local economic development.

This section concludes with a Fair Housing Action Plan that IHFA and Commerce will use to mitigate barriers to housing choice. That plan contains two sets of recommendations:

1) Recommendations that are directly within the purview of IHFA and Commerce and will be executed over the 5 year period covered by this plan; and

2) Recommendations put forth by stakeholders and residents during the development of this plan that will be considered as resources and capacity allows. Not all of these recommendations fall within the purview of IHFA and Commerce and may require state legislative action; *these areas are indicated in italics*.

Geographic focus. This study takes a unique geographic focus to ascertain similarities in demographic trends, housing price increases, and housing needs. Idaho counties are grouped according to USDA definitions for: "metro," "nonmetro micropolitan," and "nonmetro noncore" classification[1]:

[1] https://www.ers.usda.gov/topics/rural-economy-population/rural-classifications/what-is-rural/

- Metro counties are defined as central counties with one or more urbanized areas (densely-settled urban entities with 50,000 or more people), as well as outlying counties that are economically tied to the core counties as measured by labor-force commuting;
- "Nonmetro micropolitan" areas are defined as nonmetro labor-market areas centered on urban clusters of 10,000-49,999 people; and
- "Nonmetro noncore" areas, are the remaining counties not part of "core-based" metro or micro areas.

Interactive component: Idaho Data Dashboard. The key data elements of this study can be easily accessed online, at this link:

https://reports.mysidewalk.com/209b1e773e

The dashboard presents key indicators related to housing choice in three sections including demographics, housing market, and economic indicators—with peer state comparisons for select variables. An example of the dashboard output appears below.

Idaho Data Dashboard Infographic Example

Owner v. Renter Household Characteristics

Average Household Size - Owner Occupied

2.7
People
Idaho

2.7
People
United States of America

Average Household Size - Renter Occupied

2.5
People
Idaho

2.5
People
United States of America

Median Income - Owner Occupied

$67,135
USD
Idaho

$79,270
USD
United States of America

Median Income - Renter Occupied

$35,175
USD
Idaho

$40,505
USD
United States of America

Excessive Owner Housing Costs: 30 Percent or More of Income normalized by Owner Occupied Housing Units

19.9%
Idaho

22.3%
United States of America

Excessive Renter Housing Costs: Gross Rent 30 Percent or More of Income per renter occupied housing unit

42.1%
Idaho

46%
United States of America

Data sources and methodology. This study utilized the most recent data available at the time it was completed in year end 2021. It draws on relevant: state-generated data, U.S. Census' American Community Survey, economic growth indicators, and recent academic research. In many cases, 2019 was the most recent year for which data were available.[2]

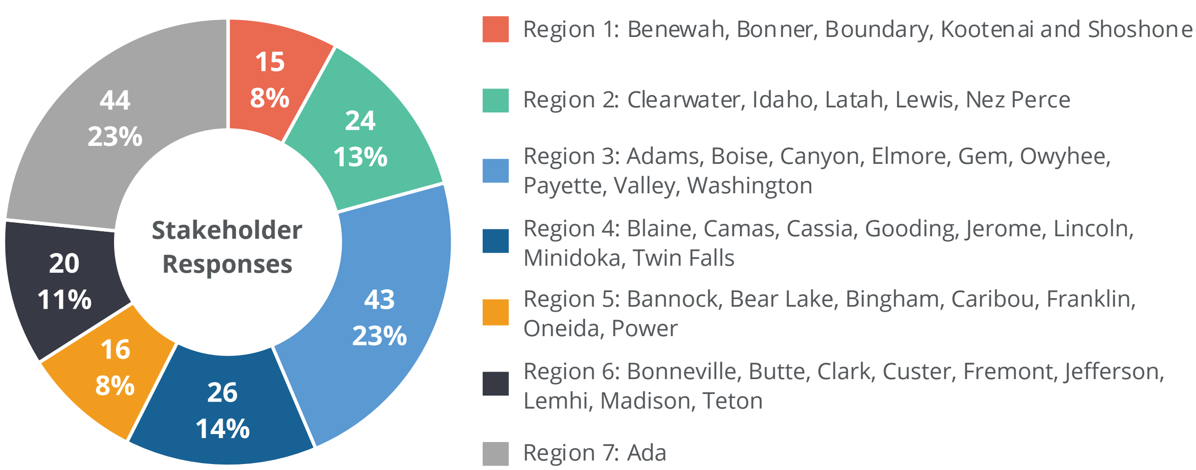
Quantitative data were bolstered by engaging with stakeholders who could speak to residents' and communities' current needs—particularly those stemming from job losses during the pandemic, rapidly rising housing prices, and a decline in naturally occurring affordable housing.

Community Engagement

Virtual focus groups and interviews were held with advocates in the disability community; advocates in and for the refugee community; Low-income households and households experiencing homelessness; Hispanic residents; advocates for racial inclusion; and advocates for sexual orientation and gender identity inclusion.

A survey of nearly 200 stakeholders representing communities statewide also informed the study. These stakeholders represented local government, state government, homeless services, affordable and fair housing, economic development, disability rights, and service providers.

Idaho Regions Represented by Survey Respondents



Note: n=137 for this question. All respondents totaled 190.

Source: 2021 Idaho Stakeholder Survey.

[2] Limited data from the 2020 Census had been released at year end 2021; however, the available data from that Census were limited at that time.

Demographic and Economic Context for Impediments

Demographic changes have been modest.

- The State of Idaho's population has almost doubled since 1990, when it was about one million people. Although the state's annual growth has been consistently strong since then, the fastest rate of growth occurred during the 1990s, with the influx of Baby Boomers moving to the West. Growth between 2010 and 2020 was lower than that experienced in prior decades.

- As Idaho has grown, its resident base has become slightly more diverse racially and ethnically. In the past five years, the state has experienced strong growth in Hispanic residents and a variety of other races. Yet the strongest growth in numbers has remained in White, non-Hispanic residents.

- Residents in Idaho are aging, and the proportion of residents with disabilities has increased slightly due to the correlation of disability and age: 14% of Idahoans report having a disabling condition.

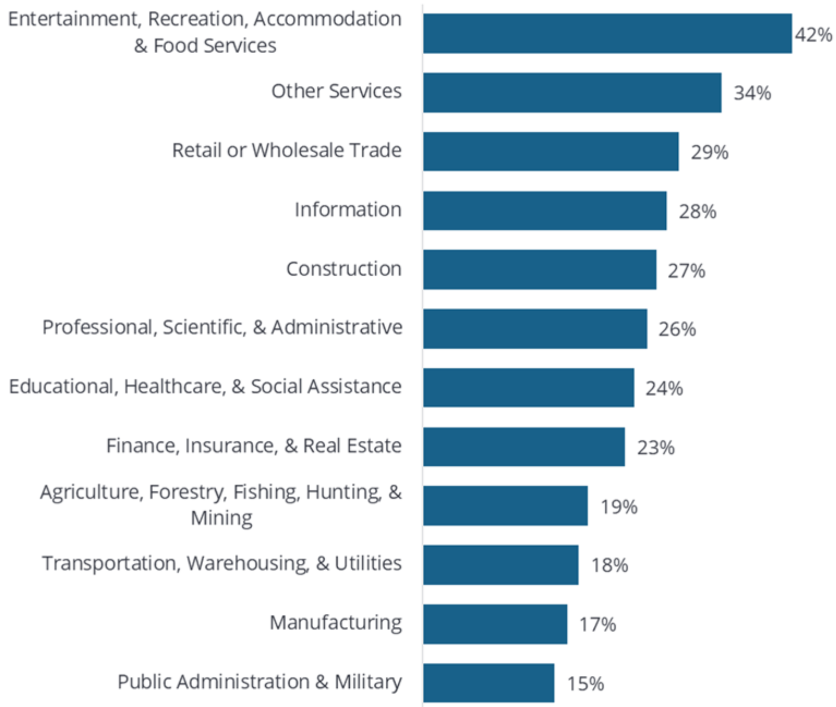
Economic growth has been robust—and could benefit more Idahoans.

- In the past 20 years, Idaho's economic growth, as measured by its Gross Domestic Product (GDP), has been consistently strong. GPD grew by 62%, and the number of private firms in Idaho rose by 55%. Idaho bounced back from the pandemic quickly. Of its neighboring states, only Washington recovered faster than Idaho as measured by change in GDP.

- The state's economic expansion created many new jobs—but mostly in lower-paying industries such as tourism and recreation. Workers in these industries have trouble covering rising housing costs on their wages.

  As shown in the following graphic, 42% of households in which the head of household works in entertainment, recreation, accommodation, or food service are housing cost burdened. Thirty-four percent (34%) of those working in the service industry are cost burdened and 29% of workers in retail are cost burdened.

Cost Burden by Employment Industry

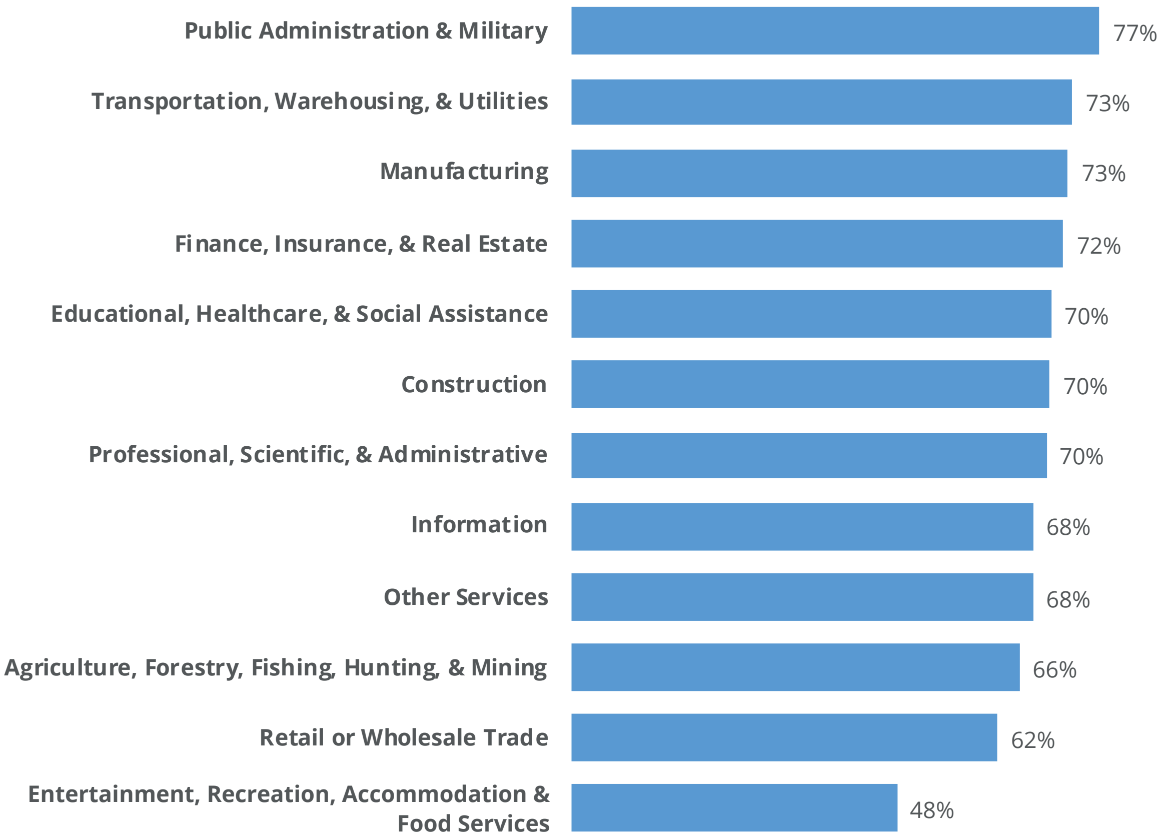


Note: Households are considered cost burdened if their gross rent or total monthly ownership costs are greater than 30% of their household income. Households' industry is determined by the industry of the household head. Unemployed household heads or those out of the labor force are excluded from the data. "Other Services" include automotive repair and maintenance, personal and household goods repair and maintenance, barber shops, beauty salons, laundry services, religious organizations, etc.

Source: 2019 5-year IPUMS data and Root Policy Research.

- Jobs in many of the state's fastest growing industries do not pay wages that will help Idahoans achieve homeownership; as such, the state's relatively high homeownership rate could drop unless more affordable housing products are introduced to local markets. As shown below, just 48% of those working in entertainment, recreation, accommodation, or food service owned their homes.

Homeownership Rates by Industry, State of Idaho, 2019



Notes: Households are considered cost burdened if their gross rent or total monthly ownership costs are greater than 30% of their household income. Households' industry is determined by the industry of the household head. Unemployed household heads or those out of the labor force are excluded from the data. "Other Services" include automotive repair and maintenance, personal and household goods repair and maintenance, barber shops, beauty salons, laundry services, religious organizations, etc.

Source: 2019 5-year PUMS data and Root Policy Research.

A continued and larger diversion of household spending from goods and services into housing has real economic implications for Idaho. Had all housing cost-burdened households in Idaho been able to spend just 30% of their incomes in housing costs, economic modeling suggests this would have the potential to free up $971 million in household spending annually that could have otherwise been saved, spent, and invested within Idaho communities.[3]

[3] Sometimes referred to as 'foregone' or 'crowded-out' spending, Estimates are based on an economic formula created by Shift Research Labs and the Colorado Futures Center that utilize data from the Census' American Community Survey (ACS) and the Federal Reserve's Consumer Expenditure Survey.

Impediments to Fair Housing Choice

Impediment No. 1: Many Idaho workers earn low wages that have failed to keep pace with housing cost increases and some residents remain unemployed despite a strong labor market. These residents face persistent cost burden.

- Overall, 25% of the state's jobs pay less than a current housing wage.[4] These jobs are commonly occupied by racial and ethnic minorities and foreign-born workers.

- Foreign-born workers are more likely to participate in the workforce overall than U.S.-born workers, and be employed in relatively low-paying entertainment, accommodation, and food service jobs.

- Residents with disabilities face barriers to employment due to lack of public transportation; location of jobs relative to affordable housing; and access to skills and job training. Thirty-one percent (31%) of working-age Idahoans with disabilities were employed or looking for a job compared to 63% of the working-age population overall.

Impediment No. 2: Housing needs persist—and disproportionately affect persons with disabilities and racial and ethnic minority households.

- Around 6% of Idaho's population has an ambulatory disability but less than 1% of the housing stock is estimated to be accessible or visitable. A lack of visitable single-family housing for rent or purchase is a barrier to independent living and community integration.
- Idahoans with a disability are more likely to live in housing that is in substandard condition, live in overcrowded housing, and face cost burden than those without disabilities. More than half of Idahoans with a cognitive disability face acute housing problems.
- African American and Native American homeowners face the highest rates of housing cost burden among homeowners in the state. Among renters, Native American and White, non-Hispanic Idahoans faced the highest rates of burden.
- African American, Native American, and Hispanic households are two to four times more likely to live in overcrowded conditions than Idahoans overall.
- 71% of White Idahoans own their homes compared to just 38% of African American households and about half of Native American and Hispanic households.
- African American, Native American, and Hispanic applicants for mortgage loans are denied loans 1.5 to 2 times more often than White, non-Hispanic applicants. They are also more likely to receive high priced mortgage loans if they are approved. These

[4] Unemployed household heads or those out of the labor force are excluded from the data.

trends are similar nationwide and apply to all mortgage products.[5] The reasons for these persistent disparities are thought to be a result of both higher debt to income ratios of non-White and Hispanic applicants (related to the need to provide support for extended families) and preferences for neighborhoods and communities that have lower land values because of historical discrimination and underinvestment. Research is nascent and continuing in this area.

Impediment No. 3: Idaho's regulatory stance on laws affecting affordable housing does not actively facilitate housing production.

- Idaho statutes continue to be silent in the many areas that affect residential development. Regulations governing land use, zoning, housing type and placement (including group living facilities) are primarily adopted and applied at the local level. While this approach allows local governments to tailor policies to meet their needs, it increases local governments' vulnerability to fair housing challenges, and a review of local policies conducted for this study identified needed improvements in local regulations.
- Idaho's "hands off" stance does little to encourage much-needed housing supply. Many peer and surrounding states have shifted to a more proactive regulatory framework to address the significant and persistent housing challenges facing Western states.
- Local land use and zoning regulations do not consistently embrace practices—including allowance of group homes by right in moderate density zoning districts; clarifying definitions for reasonable accommodations or disability; reducing parking for affordable housing; or allowing density bonuses to incentivize affordable housing.

Impediment No. 4: Knowledge of fair housing laws and rights could be improved to facilitate housing choice.

Moving forward. Idaho is in a strong position to consider bolstering its approach to housing policy with an eye toward narrowing disparities in needs and promoting access to economic opportunity. This is because:

- The state is in a sound position economically;
- The infusion of federal funding presents a unique opportunity to invest in and leverage innovative and effective housing solutions;
- There is a growing recognition that housing challenges impair long term economic growth; and
- Needs are at a more manageable level with the state's overall decline in poverty.

[5] https://files.consumerfinance.gov/f/documents/cfpb_2020-mortgage-market-activity-trends_report_2021-08.pdf

Fair Housing Action Plan

This section contains the Fair Housing Action Plan that IHFA and Commerce will use to mitigate barriers to housing choice. That plan contains two sets of recommendations:

1) Recommendations that are directly within the purview of IHFA and Commerce and will be executed over the 5-year period covered by this plan; and

2) Recommendations put forth by stakeholders and residents during the development of this plan that will be considered as resources and capacity allows.

3) Not all recommendations fall within the purview of IHFA and Commerce and may require state legislative action; *these are indicated in italics.*

Solutions to address consequences of low wages and gaps between wage growth and housing costs.

The growing gap between what Idahoans can afford and what they earn—and the negative impacts on household economic growth—was raised consistently as a concern by stakeholders and is supported by the analysis in the AI. Specifically,

- Idaho faces a shortage of housing options—especially affordable housing—related to the state's economic expansion and growing popularity as a destination state.
- Idahoans' access to business and employment opportunities, public transportation options, quality educational environments, broadband access, and childcare supports vary considerably by geography and among residents, with rural areas typically having the lowest access and fewest resources to address needs.
- Lack of public transportation was identified by stakeholders as a major barrier to workers and businesses in the agricultural and service industries, as many workers cannot afford cars.
- The state has a relatively low labor force participation rate by women with young children (64%), partially due to lack of childcare which stakeholders report is a major barrier to business growth in rural Idaho.

Action item No. 1: Address workers' and residents' housing needs through incentives, funding, and technical assistance.

IHFA and Commerce Five-year Action Items:

- Continue to allocate CDBG to job creation and skill development activities in rural areas.
- Communicate to foundations and other private sector partners the need for resources to improve access to affordable childcare and early childhood education programs for low and middle income families and families who are shift and weekend workers. Specifically, funds are needed to expand operations for licensed/quality childcare

businesses and small day care operators, provide more training for care providers, open more childcare centers, and increased monitoring of facilities to ensure high-quality care;

- Continue to fund child care centers with CDBG and bolster awareness as an eligible activity.

- Continue to utilize and promote existing resources such as Local Housing Solutions and WeCAN Peer Learning Network's Tri-State Housing Solutions Roundtable to educate rural communities about innovative and effective responses to housing challenges. Involve local planning and housing staff as well as local leadership and guest speakers from successful initiatives in peer communities.

Stakeholder recommended Action Items:

- Explore federal funding opportunities to expand transportation options, including shared shuttle programs, that serve low-income workers and accommodate the needs of persons with disabilities.
- As opportunities allow, prioritize federal funding to expand public transportation services to include later and weekend transit hours on existing routes, and expand routes to areas where low-income workers need it most.

Solutions to narrow disparities in housing challenges and choice.

Some Idahoans are more affected by affordable housing shortages than others due to historical barriers to housing access, housing discrimination, and employment discrimination—all of which have adverse effects on wealth building.

Disparities in housing needs are found in homeownership access, as well as being able to pay rent. For instance,

- 71% of White Idahoans own their homes, compared to just 38% of Black households, 56% of Native American households, 53% of Hispanic households, and 63% of Asian households.
- Hispanic and Black mortgage applicants are denied loans at higher rates than White applicants; and
- Idahoans with disabilities are more likely to live in a home with housing problems and to struggle to afford housing.

There is growing evidence of the cost effectiveness of addressing accessibility needs of persons with disabilities proactively through good design and construction—rather than retrofitting units later. For example,

- Economists have calculated that there is a 60% probability that a newly built single-family detached home house at least one disabled resident during its expected lifetime—and that 91% will welcome disabled visitors.[6]
- The cost to build accessibility features into new construction are negligible, estimated at $250 per new home. This compares with an average retrofit cost of $4,000 per home.[7] The total cost to retrofit the estimated number of inaccessible homes in Idaho needed to meet the needs of people with disabilities (102,000) would be $408 million—$382 million more than what it would have cost to make these homes accessible when they were built. New construction design/build costs for purpose-built, zero-step single-family units are negligible, while modifications are typically cost-prohibitive and can impact the home's integrity and aesthetics.[6]
- Accessible homes have been shown to reduce the cost of in-home care, thus reducing the financial burden faced when paying for formal care labor and the time burden faced by informal care providers.[8] According to the State Independent Living Council (SILC), as of 2002, the average Medicaid recipient with home-based care saved Medicaid up to $32,000 annually when compared to institutional care.[9]
- Other studies have found that the effect of disability on mental health is worse if living in unaffordable housing, meaning that affordable and accessible housing for individuals with disabilities could also reduce associated mental healthcare costs.[10]

Action item No. 2a: Reduce disparities in housing needs among persons with disabilities and racial and ethnic minority households.

IHFA and Commerce Five-year Action Items:

- Continue preferences for housing persons with disabilities and elderly, and extremely low-income households, in state housing grant awards.
- Continue to include a preference for Low Income Housing Tax Credit (LIHTC) project applications that target very low- and extremely low-income households for permanent supportive housing to persons with disabilities and/or persons experiencing homelessness.

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[6] Smith, Stanley K., Stefan Rayer, and Eleanor A. Smith. "Aging and disability: Implications for the housing industry and housing policy in the United States." *Journal of the American Planning Association* 74.3 (2008): 289-306.

[7] https://visitability.org/quick-guide-to-low-costs-of-visitability-vs-costs-of-no-change/visitability-costs-affirmed/

[8] Smith, Stanley K., Stefan Rayer, and Eleanor A. Smith. "Aging and disability: Implications for the housing industry and housing policy in the United States." *Journal of the American Planning Association* 74.3 (2008): 289-306.

[9] https://fairhousingforum.org/disabilities/inclusive-home-design-getting-customers-in-the-door

[10] Kavanagh, A. M., Aitken, Z., Baker, E., LaMontagne, A. D., Milner, A., & Bentley, R. (2016). Housing tenure and affordability and mental health following disability acquisition in adulthood. *Social science & medicine*, *151*, 225-232.

[6] https://visitability.org/quick-guide-to-low-costs-of-visitability-vs-costs-of-no-change/

- Continue to fund credit counseling and homeownership readiness programs, including bilingual options and affirmative marketing of programs. Monitor the income and demographics of participants to be sure they represent households with the largest disparities in ownership.
- Continue to require that communities receiving housing awards, including tax credits, are taking meaningful actions to reduce fair housing discrimination and housing access barriers.
- Continue to provide extra scoring points to CDBG grant applicants that have local fair housing protections that are equivalent to federal protections.
- Explore a program that pairs "good tenant" education with first and last month's rent and security deposit subsidies to landlords who agree to rent their units to voucher holders, tenants perceived as higher risk, and those who might not meet traditional application requirements.

Stakeholder recommended Action Items:

- Consider an incentive grant program like Colorado's new 1271 grant that supports planning and zoning and land use studies, innovative housing solutions, and infrastructure expansions to support affordable housing. In the stakeholder survey, one economic development expert noted that even if their community wanted to upzone, planning staff do not have the experience to do so. This individual expressed that their community needs guidance from more urban community developers on updating water and sewer capacity, setting rates, and developing new multifamily housing. *Note: This would require a legislative action to direct funding to a grant.*
- Support state efforts to establish a recurring source of funding for affordable housing development and preservation. This may include local funding mechanisms to help raise revenue to address their affordable housing needs and/or make tax decisions and implement fees to support affordable housing development, workforce housing, and related infrastructure improvements. *Note: This would require a legislative action.*

Action item No. 2b: Increase the number of accessible and visitable housing units and accessible neighborhoods for persons with disabilities.

IHFA and Commerce Five-year Action Items:

- Continue and consider expanding scoring preferences in the Qualified Allocation Plan (QAP) for Low Income Housing Tax Credit (LIHTC) developments that prioritize accessibility, visitability, and adaptability features in design.
- Continue scoring priorities for ADA improvements funded with CDBG, to set five- and one-year goals for ADA accessibility/barrier removal activities, and to ensure that all CDBG grantees have updated their ADA transition plans prior to project close out.

- Consider providing additional HOME funding to projects that exceed federal housing accessibility requirements in multifamily construction to cover additional costs associated with exceeding that requirement.

Stakeholder recommended Action Items:

- Implement a new fund or pool existing resources: 1) For people with disabilities to access to make home modifications for accessibility; 2) To incentivize newly built housing to make units visitable and adaptable; 3) To assist group homes with financial stability and viability.[11] *Note: This would require a legislative action to direct funding to the proposed activities.*

- Explore state incentives (such as Colorado's 1271 program mentioned above) and federal funds to increase housing density allowed around transportation corridors and therefore expand affordable and accessible housing around transit hubs. This would address disparities like those mentioned by Canyon County stakeholders, where residents with disabilities who are not near a bus stop cannot get access to basic amenities like the grocery store.

Solutions to enhance affordable housing production.

Idaho has been challenged to keep up with production demand. From 2010 to 2019, Idaho has increased its overall housing stock by 11%, or by 71,271 units. During this same period, the median home value in Idaho rose 23%, and rental price increased 24%. While in-migration of new residents played a role, the increases in prices was also related to other factors including low interest rates, lack of supply, and demand for second homes.In 2020, 8% of home loans in the entire state were for second homes, an increase of 2 percentage points from the 6% of loans in 2019 and 2018.

Action item No. 3: Support legislative efforts to expand housing choice.

IHFA and Commerce Five-year Action Items:

- Continue education and outreach activities for local governments on economic opportunities created by housing affordability and equity, and explore best practices in land use and zoning to encourage diverse housing types and price points.

Stakeholder recommended Action Items:

- *Support legislative efforts to encourage or allow by-right affordable housing development and gentle density bonuses for affordable developments as long as they are compatible with the local government's comprehensive plan.*

[11] https://visitability.org/

- *Support legislative efforts that expand local governments' ability to raise funds to expand housing choice.*

Solutions to improve knowledge and awareness of fair housing laws.

Action item No. 4: Continue fair housing education and outreach and further local governments' adoption of AFFH principles.

IHFA and Commerce Five-year Action Items:

- Continue to require that CDBG awardees take efforts to support AFFH by:
    - Designating a fair housing resource contact;
    - Adopt and publish a fair housing resolution and proclaim April as Fair Housing month;
    - Display fair housing information;
    - Complete a fair housing assessment form to examine barriers and inequities in zoning and land use, public transportation, property taxes, economic development, as well as fair housing education and outreach initiatives.
- Continue to prioritize investments in fair housing education and outreach. Residents engaged in development of this AI were rarely aware of any organizations they could reach out for help or guidance. Idaho's commitment to fair housing education and outreach is impressive, and reflects best practices in the industry.
- Prioritize fair housing law education for landlords, property managers, local government staff, elected officials, and neighborhood associations. This should address landlord concerns with the Section 8 program to address misinformation and perceived difficulties.
- As reliable Census data releases are available, update and expand the Idaho Data Dashboard created as part of the current AI. This demographic tool provides an efficient method to enable the state and Idaho communities to inform planning and reporting activities.
- Continue to provide state leadership with information on the benefits of a substantially equivalent state fair housing act, including: the ability for the state to take on a stronger enforcement role, realization of investigation efficiencies, and access to additional federal resources.

Stakeholder recommended Action Items:

- Consider pursing funding for a management consultant or mediator to work through tensions between fair housing enforcement organizations, housing providers, and local governments, with the goal to establish best practices from other fair housing organizations that seem to strike this balance. Alternatively, provide mediation services to help create less adversarial relationships between local landlords/business owners and fair housing advocates. Many stakeholders expressed concern about existing fair housing organizations' conflicts between providing education and outreach and also being responsible for bringing fair housing lawsuits.

SECTION I.

DEMOGRAPHIC ANALYSIS

SECTION I.
Demographic Analysis

The Demographic Summary is the starting point for the fair housing analysis. It provides information on how the drivers of housing choice and housing needs—including income, household characteristics, age, and disability status—have changed over time.

This section also provides indicators of potential fair housing issues. For example, segregation may suggest that certain residents face housing discrimination and/or cannot find affordable, accessible housing in a neighborhood or community.

The analysis in this section is conducted by:

- Population;
- Race and ethnicity;
- National origin;
- Limited English Proficiency (LEP);
- Disability status; and
- Familial status.

Geographic focus. Data in this section are presented for the state overall and for each county in the state. Idaho is a large, geographically diverse state. Its communities encompass urban areas, suburban areas, rural communities, very rural landscapes, Native American reservations, and resort-oriented communities. Examining data at the county level allows a more detailed analysis of the various dynamics driving housing choice in these various geographies. Counties are grouped according to USDA definitions for: “metro,” “nonmetro micropolitan,” and “nonmetro noncore” classification[1]:

- Metro counties are defined as central counties with one or more urbanized areas (densely-settled urban entities with 50,000 or more people), as well as outlying counties that are economically tied to the core counties as measured by labor-force commuting;
- “Nonmetro micropolitan” areas are defined as nonmetro labor-market areas centered on urban clusters of 10,000-49,999 people; and

[1] https://www.ers.usda.gov/topics/rural-economy-population/rural-classifications/what-is-rural/

- "Nonmetro noncore" areas, are the remaining counties not part of "core-based" metro or micro areas.

Primary Findings

This analysis of demographic trends, patterns of growth, and location of residents by protected class reveals the following:

- Idaho's residents are much more diverse than 20 years ago, and even five years ago. In 2000, 8% of the state's residents reported being of Hispanic descent; by 2019, that had increased to 13%. Change in the racial composition of residents has mostly occurred in the past 5 years: In 2014, 8% of residents reported their race as non-White; as of 2019, that had risen to 11%. In the past five years (2014 to 2019), Idaho has experienced significant proportional growth in residents identifying as a variety of races and of Hispanic descent. Yet the strongest growth in numbers is for White, non-Hispanic residents.

- The overall proportion of the state's foreign-born population has also steadily increased over the past 20 years, growing from 2.6% in 2000 to 6% in 2019. Over the last five years, the proportion of foreign-born residents has remained constant.

- The proportion of residents experiencing disabling conditions has slightly increased to 14% of all Idahoans, up from 13% in 2014.

- One major demographic change in the state has been the collective reduction in poverty. In 2014, 15.6% of residents lived below the poverty line, compared to the current rate of 11.2%. This is even lower than in 2000 (12%). However, Idaho's children are still the most likely age group to experience poverty.

- Idaho has no racially or ethnically concentrated areas of poverty—areas of very high poverty and racial and ethnic majorities. However, there are neighborhoods with more than 50% non-White Hispanic residents and high rates of poverty (between 23-37%) found within and near Caldwell, north of Pocatello, and in Burley.

- Over the last five years, counties that were highly segregated by race and ethnicity, determined by a statistical measure, have collectively decreased. This change is not uniform across races and ethnicities: Native Americans are more likely to be living in highly segregated areas, and Hispanic, African American, Asian, and multiracial residents are less likely.

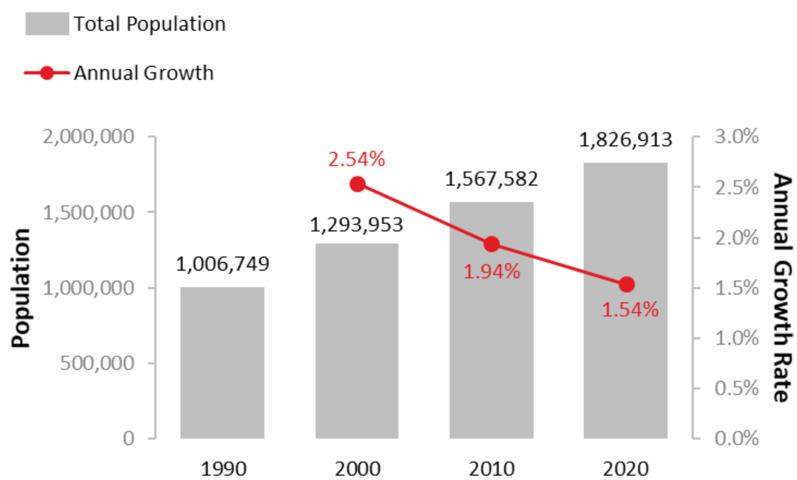
Population

The University of Idaho estimates the state's 2020 population at 1,826,913, a 41% increase since 2000. Between 2010 and 2020, the state's population increased by nearly 260,000 people, or 16.5%. Figure I-1 below shows population trends for 1990 through 2020.

Figure I-1. Population, State of Idaho, 1990 to 2020

Note: Annual Growth shows the compound annual growth rate.

Source: University of Idaho Extension, Indicators Idaho



As shown in Figure I-1 above, Idaho grew the fastest between 1990 and 2000, with an average annual growth rate of 2.54%. This is consistent with patterns in many Western states, and is related to an influx of the large generation of Baby Boomers seeking lifestyle communities.

Over the last ten years, the state has grown at a slower rate than the previous two decades (1.54%). However, relative to the nation, Idaho was the second fastest growing state over the last decade, behind Utah and in front of Texas, North Dakota, and Nevada. .[2]

Figure I-2 shows population growth by county over the last twenty years, while Figure I-3 shows population growth over the last ten years by geographic typology, and in descending order by fastest growth.

As noted above, Figure I-3 employs the USDA typology for the state's counties: "metro," "nonmetro micropolitan," and "nonmetro noncore" classification mentioned above. Those typologies include[3].

- Metro counties have one or more urbanized areas (densely-settled urban entities with 50,000 or more people), or are outlying counties that are economically tied to the core counties as measured by labor-force commuting;
- "Nonmetro micropolitan" areas are nonmetro labor-market areas centered on urban clusters of 10,000-49,999 people; and
- "Nonmetro noncore" areas include all other counties.

These distinctions are important for the fair housing analysis because the types of fair housing challenges—and solutions to those challenges—often vary by typology. For

[2] Population Growth Sputters in Midwestern, Eastern States, Pew Research Trust, July 27, 2021 (include URL)

[3] https://www.ers.usda.gov/topics/rural-economy-population/rural-classifications/what-is-rural/

example, urban areas have more racial and ethnic diversity and, as such, are more likely to show racial and ethnic concentrations. These may or may not be a fair housing concern, depending on the reason for the concentration. Conversely, the fair housing challenges in rural areas are more likely to be related to disability and accessibility. This is because rural areas have higher proportions of seniors, who are more likely to have disabilities. In addition, rural areas by their very nature have low-density built environments, which make transportation and non-vehicular travel challenging.

Population shifts in metro counties. Sixty-eight percent of the state's population falls within counties classified as "metro" counties. These counties experienced the lion's share of the state's population growth over the last decade, accounting for 84% of the state total.

As of 2020, Ada County, home to the City of Boise, remains the most populous county in the state, with a total population of nearly 500,000. Twenty-seven percent of the state's residents live in Ada County. Canyon is the second-largest county with a population approximating 237,000; Kootenai is third at 170,000.

Altogether, just under half of the state's population resides in these three counties. These counties also boast the fastest population growth in the state, accounting for 70% of the growth experienced over the last decade. Aside from Kootenai and Nez Perce Counties, the majority of metro county growth is concentrated in the southern portion of the state. Butte County was the only county to not experience growth in population over the last decade.

Population shifts in nonmetro micropolitan counties. Twenty-four percent of the state's population falls within counties classified as "nonmetro micropolitan"; however, these counties only experienced 14% of the state's growth over the last decade.

The non-metro micropolitan county experiencing the most population growth is Teton County, whose population increased by almost one-fourth. This population increase appears to be driven by younger people moving to the area for employment opportunities.[4] Other counties experiencing double-digit population growth include Bonner, Twin Falls, Blaine, Jerome, and Latah Counties. The only county not to experience growth in this category was Fremont County, whose population declined by 24 people over the last 10 years.

With the exception of Bonner and Latah Counties, similar to metro counties, the population growth experienced in nonmetro micropolitan counties is concentrated mainly in southern Idaho.

Population shifts in nonmetro noncore counties. Eight percent of the state's population falls within counties classified as "nonmetro noncore". This subset of counties

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[4] *Teton County fastest growing county in East Idaho*, Teton Valley News, April 23, 2019.

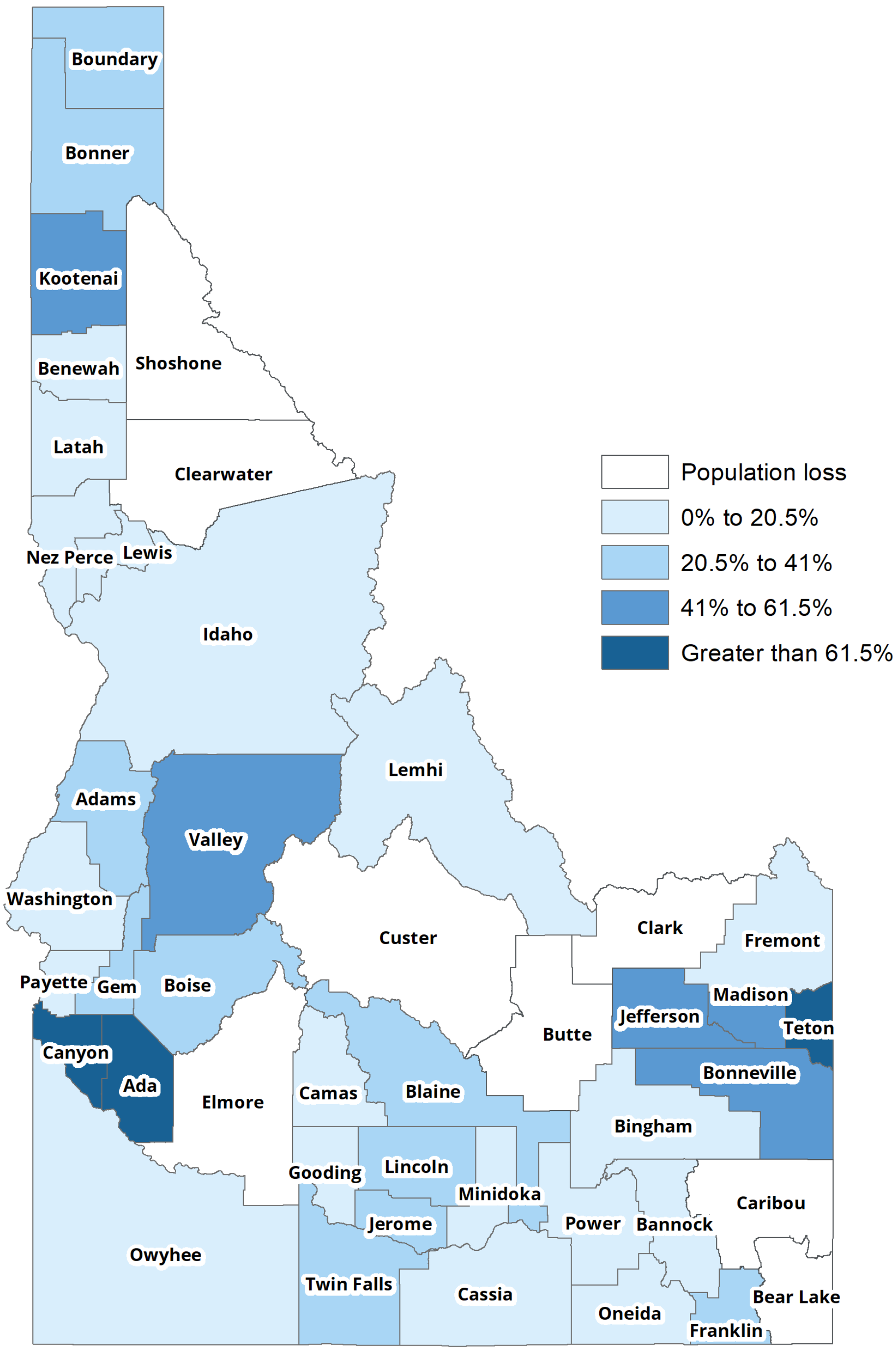
experienced the least amount of growth, accounting for just 2% of the state's population growth over the last decade.

Of the population growth in these counties, Valley County (20% population increase) and Boundary County (15%) accounted for 65% of all nonmetro noncore county growth. Adams County, located adjacent to Boundary County, was the only other nonmetro noncore county to experience double digit population growth (12%). The majority of counties experienced minimal growth (between 1-3%). Power, Custer, and Clark Counties all saw their populations decrease.

Changes overall. Outstanding population trends for the three geographic classifications in the state include:

- Exceptional growth between 2010 and 2020 in Ada (26% population increase), Canyon (25%), Teton (23%), and Valley (20%) Counties, respectively. Growth in these counties was strongest before the Great Recession in the mid-2000s.
- Nearly half of the metro counties mirror or exceed the state's overall growth rate of 17%.
- All but one of the nonmetro micropolitan counties exceed the state's rate, with most growing between 6% and 10%.
- Nonmetro noncore counties are split between high growth and low growth counties, with few showing moderate growth.

Figure I-2.
Population Change, Idaho Counties, 2000-2020



Note: The State of Idaho growth rate was 17%.

Source: University of Idaho Extension, Indicators Idaho.

Figure I-3. Population Level and Change by County, 2020

Source:

University of Idaho Extension, Indicators Idaho. For classifications, source is USDA, Economic Research Service using data from the U.S. Census Bureau.

County	2010	2020	2010-2020 Numerical Change	2010-2020 Percent Change
Metro				
Ada	392,365	494,399	102,034	26%
Canyon	188,923	237,053	48,130	25%
Kootenai	138,494	170,628	32,134	23%
Bonneville	104,234	122,134	17,900	17%
Jefferson	26,140	30,581	4,441	17%
Boise	7,028	8,065	1,037	15%
Gem	16,719	18,703	1,984	12%
Franklin	12,786	14,215	1,429	11%
Bannock	82,839	88,795	5,956	7%
Owyhee	11,526	12,133	607	5%
Nez Perce	39,265	40,755	1,490	4%
Butte	2,891	2,646	-245	-8%
Nonmetro micropolitan				
Teton	10,170	12,501	2,331	23%
Bonner	40,877	46,817	5,940	15%
Twin Falls	77,230	88,411	11,181	14%
Blaine	21,376	23,426	2,050	10%
Jerome	22,374	24,578	2,204	10%
Latah	37,244	40,830	3,586	10%
Payette	22,623	24,771	2,148	9%
Cassia	22,952	24,277	1,325	6%
Madison	37,536	40,318	2,782	7%
Minidoka	20,069	21,216	1,147	6%
Bingham	45,607	47,202	1,595	3%
Lincoln	5,208	5,358	150	3%
Elmore	27,038	27,448	410	2%
Camas	1,117	1,130	13	1%
Fremont	13,242	13,218	-24	0%
Nonmetro noncore				
Valley	9,862	11,792	1,930	20%
Boundary	10,972	12,656	1,684	15%
Adams	3,976	4,447	471	12%
Oneida	4,286	4,520	234	5%
Bear Lake	5,986	6,143	157	3%
Idaho	16,267	16,823	556	3%
Benewah	9,285	9,430	145	2%
Caribou	6,963	7,123	160	2%
Washington	10,198	10,360	162	2%
Clearwater	8,761	8,846	85	1%
Gooding	15,464	15,618	154	1%
Lemhi	7,936	8,054	118	1%
Shoshone	12,765	12,911	146	1%
Lewis	3,821	3,838	17	0%
Power	7,817	7,643	-174	-2%
Custer	4,368	4,249	-119	-3%
Clark	982	852	-130	-13%
State of Idaho	1,567,582	1,826,913	259,331	17%

Age. The age of residents also drives housing demands in a variety of ways. For best understanding housing needs, age groups can generally be segmented by children (under 18 years), working age (18 to 64), and seniors (65 and older).

Twenty-six percent of Idaho residents are under the age of 18. Fifty-nine percent of Idaho residents make up the working age population (between 18-64). According to 2019 ACS data, 15% of Idahoans are at least 65 years old. While the neighboring state of Washington has the same proportion of older residents, Oregon and Montana have slightly greater proportions, at 17% and 18% respectively.

Of the three age categories, Figure I-4 shows that seniors saw the greatest proportional population increase (19%) over the last five years.

Figure I-4.
Age Cohorts, State of Idaho, 2014 and 2019

Source:
2014 and 2019 5-year American Community Survey (ACS) estimates.

Age cohort	2014	2019	2014-2019 Numerical Change	2014-2019 Percent Change
Less than 18 years old	429,646	441,147	11,501	3%
18-65 years	947,004	1,011,714	64,710	7%
65 years and older	222,814	264,889	42,075	19%
Total population	1,599,464	1,717,750	118,286	7%

Race, Ethnicity, and National Origin

In 2019, 89% of Idahoans reported their race as "White," a decline from 2014.[5] The racial distribution in the state changed little until the past 5 years, driven by very strong growth in residents identifying as a variety of non-White races—a trend in other Western and Northwest states. While the percentage of many non-White racial groups grew significantly, the increase in the total number of residents gained was minimal compared to the growth of White residents. As such, the overall proportion of non-White residents has changed only modestly.

The largest minority group in the state, the Hispanic population, comprises 13% of all Idaho residents. This is just slightly less than the proportion of Hispanic residents in both Oregon and Washington and lower than the nation. Overall, 18% of residents in the United States report being of Hispanic descent.

Over the last twenty years, the state's Hispanic population has seen robust growth, although that growth has tempered in the past five years. Idaho residents of Hispanic

[5] It should be noted that Census data on race and ethnic identification vary with how people choose to identify themselves. The U.S. Census Bureau treats race and ethnicity separately: the Bureau does not classify Hispanic/Latino as a race, but rather as an identification of origin and ethnicity.

descent have more than doubled. Not only have Hispanic residents accounted for over a quarter of the state's total population growth between 2010 and 2017, but Hispanic resident growth has outpaced that of non-Hispanic residents over the last three decades.[6] However, similar to other minority groups in Idaho, the numerical growth of Hispanic residents over the last twenty years is substantially lower than non-Hispanic residents (127,900 vs. 365,212).

Figure I-5.
Race and Ethnicity, State of Idaho, 2014 and 2019

	2014		2019		2014-2019 *Numerical Change*	2014-2019 *Percent Change*
	Number	*%*	*Number*	*%*		
Total population	**1,634,464**		**1,787,065**		***152,601***	***9%***
Race						
American Indian and Alaska Native	21,550	1%	22,867	1%	*1,317*	*6%*
Asian	24,009	1%	25,969	1%	*1,960*	*8%*
Black or African American	11,354	0.7%	12,708	1%	*1,354*	*12%*
Native Hawaiian and Other Pacific Islander	1,984	0.1%	2,475	0.1%	*491*	*25%*
White	1,498,107	92%	1,596,918	89%	*98,811*	*7%*
Some other race	36,664	2%	67,428	4%	*30,764*	*84%*
Two or more races	40,796	2%	58,700	3%	*17,904*	*44%*
Ethnicity						
Hispanic or Latino	196,912	12%	229,494	13%	*32,582*	*17%*
Non-Hispanic	1,437,552	88%	1,557,571	87%	*120,019*	*8%*
Non-Hispanic White	1,352,954	83%	1,458,027	82%	*105,073*	*8%*

Source: 2014 and 2019 1-year ACS estimates.

The majority of persons of Hispanic descent in Idaho are U.S. born: approximately 75% of Idaho Hispanics were born in the United States.[7]

In 2019, 61% of Hispanic residents resided in metro counties, while 32% lived in nonmetro micropolitan counties and 6% in nonmetro noncore counties. This distribution is essentially unchanged since 2014. However, Hispanic residents disproportionately live in the southern part of the state, with the greatest concentration of Hispanic residents living in Canyon and Ada Counties (Figure I-6).

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[6] University of Idaho, McClure Center for Public Policy Research, "Hispanics: An Overview," March 2019.

[7] Ibid

According to the University of Idaho, Hispanics live in these areas due to the presence of agricultural and food processing sectors,[8] industries that are disproportionately represented by Hispanic residents.[9] Of the top 15 counties with the greatest population of Hispanic residents, Kootenai County is the only county located in the northern part of the state. According to the Idaho Commission on Hispanic Affairs, the Hispanic labor force has more than doubled since 2000 and are more likely than non-Hispanics to be in the labor force (70% vs. 61% in 2018, respectively).[10]

The counties with the greatest population of Hispanic/Latino residents, Canyon and Ada, experienced 16% and 23% growth in Hispanic residents over the last five years, respectively. Only two counties lost Hispanic residents over this time period. However, the total number of residents lost was relatively minimal (216 residents total). Outside Ada and Canyon counties, the greatest net gain of Hispanic residents occurred in Twin Falls, Bonneville, Kootenai, Bannock and Jerome Counties (between 1,000-2,000).

[8] University of Idaho, McClure Center for Public Policy Research, "Hispanics: An Overview," March 2016.

[9] University of Idaho, McClure Center for Public Policy Research, "Hispanics: Labor Force and Economy," March 2016.

[10] Idaho Commission on Hispanic Affairs, "The Hispanic Profile Data Book for Idaho, 5th Edition," 2021.

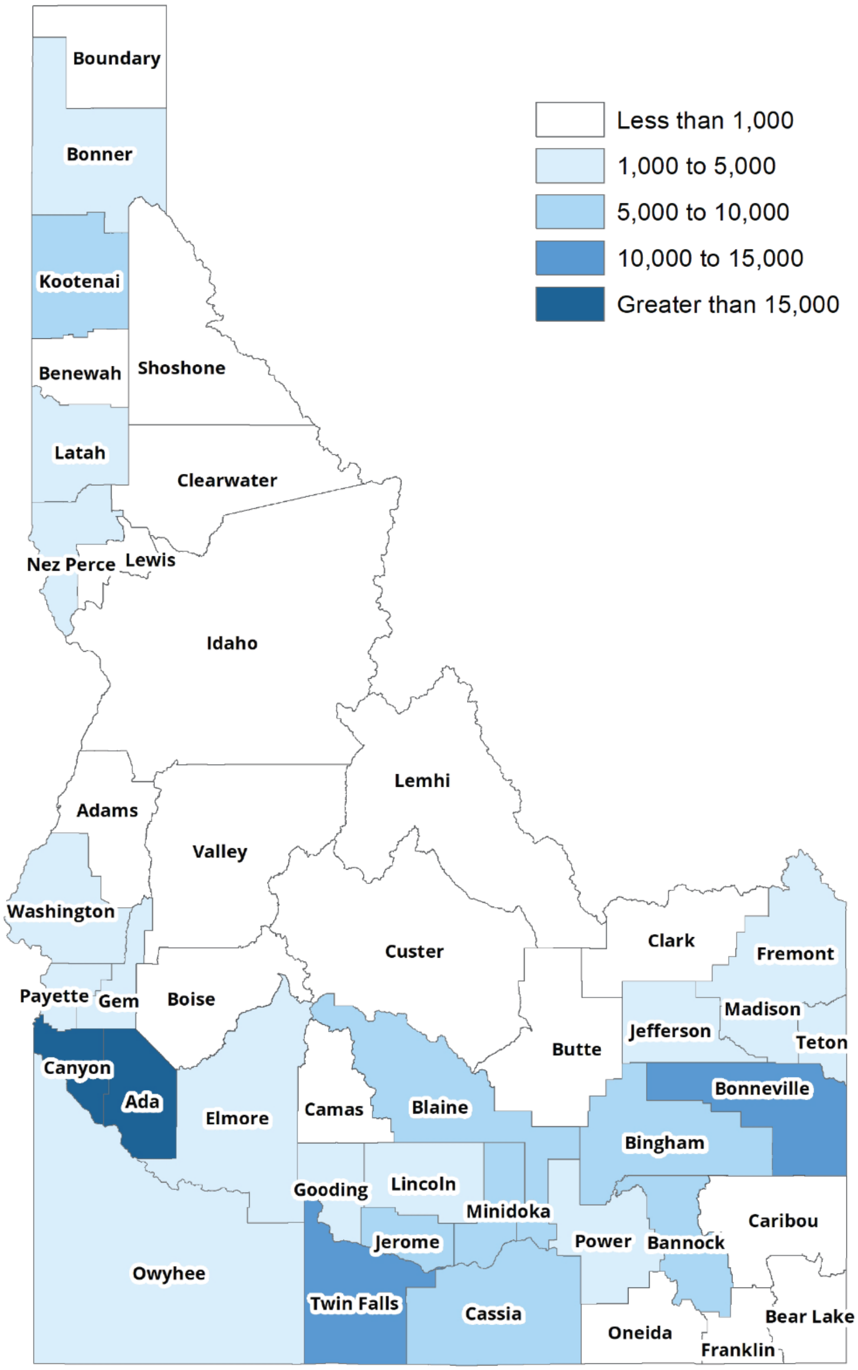
Figure I-6. Hispanic Origin by County, 2014 and 2019

Source:

2014 and 2019 ACS 5-year estimates.

County	2014	2019	2014-2019 Numerical Change	2014-2019 Percent Change
Metro				
Ada	30,412	37,469	7,057	23%
Bannock	6,160	7,381	1,221	20%
Boise	247	338	91	37%
Bonneville	12,898	14,916	2,018	16%
Butte	105	132	27	26%
Canyon	47,473	55,034	7,561	16%
Franklin	867	909	42	5%
Gem	1,349	1,451	102	8%
Jefferson	2,736	3,004	268	10%
Kootenai	5,819	7,270	1,451	25%
Nez Perce	1,287	1,579	292	23%
Owyhee	2,959	3,031	72	2%
Nonmetro micropolitan				
Bingham	8,013	8,247	234	3%
Blaine	4,316	5,062	746	17%
Bonner	1,029	1,354	325	32%
Camas	201	17	-184	-92%
Cassia	6,004	6,446	442	7%
Elmore	4,186	4,564	378	9%
Fremont	1,622	1,629	7	0%
Jerome	7,369	8,565	1,196	16%
Latah	1,468	1,726	258	18%
Lincoln	1,533	1,644	111	7%
Madison	2,419	2,964	545	23%
Minidoka	6,668	7,302	634	10%
Payette	3,590	4,034	444	12%
Teton	1,770	1,928	158	9%
Twin Falls	11,449	13,890	2,441	21%
Nonmetro noncore				
Adams	117	147	30	26%
Bear Lake	237	257	20	8%
Benewah	282	332	50	18%
Boundary	432	590	158	37%
Caribou	362	405	43	12%
Clark	354	443	89	25%
Clearwater	297	367	70	24%
Custer	108	175	67	62%
Gooding	4,339	4,403	64	1%
Idaho	471	558	87	18%
Lemhi	210	268	58	28%
Lewis	145	175	30	21%
Oneida	140	197	57	41%
Power	2,366	2,616	250	11%
Shoshone	415	449	34	8%
Valley	405	495	90	22%
Washington	1,745	1,713	-32	-2%
State of Idaho	186,374	215,476	29,102	16%

Figure I-7.
Spatial Distribution of Hispanic Residents by County, 2019



Source: 2019 ACS 5-year estimates.

Residents' national origin. National origin, a protected class in Federal Fair Housing Law, can be based either on the country of an individual's birth or where their ancestors originated. Census data report the foreign-born population, which differs from national origin, but can be used as a proxy for analysis purposes.

In 2019, approximately 102,000 Idaho residents were born outside of the United States. These residents represent 6% of the state's total population, the same proportion in 2014 and in 2010. Most of the state's growth in foreign-born residents occurred between 2000 and 2010 (in 2000, foreign-born residents represented 2.6% of the state's population).

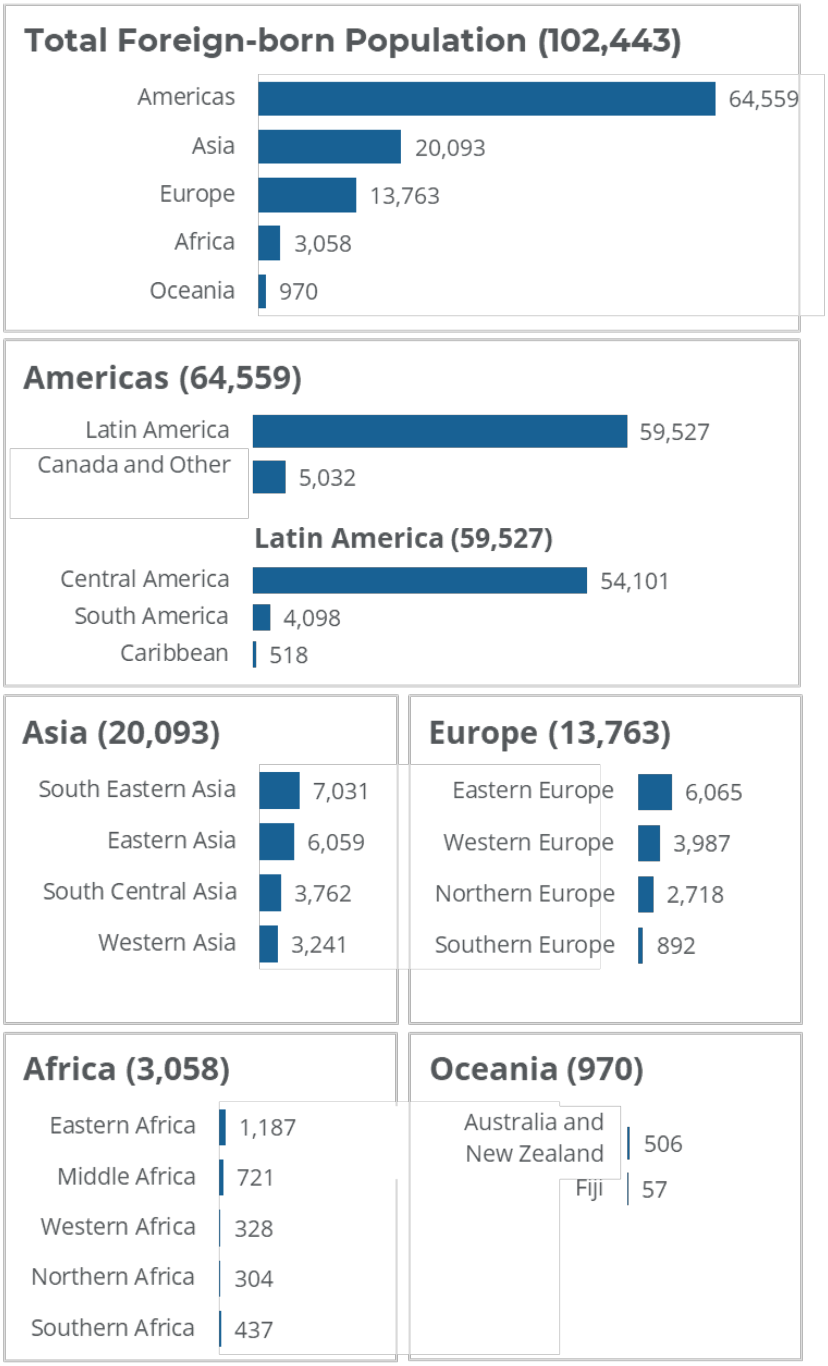
Idaho's foreign-born residents[11]:

- Are more likely to be participating in the labor force than non-foreign born residents: 70% of Idaho's foreign-born residents are in the labor force compared with 63.6% for non-foreign-born residents;
- Have more working members in their household;
- Hold lower wage jobs, have lower incomes than Idahoans overall, and have higher poverty rates (15% v. 7%); and
- Are most likely to be of Hispanic descent: 58% of the state's foreign-born citizens (3.5% of Idaho's total population) are of Hispanic descent.

Figure I-8 shows the top countries of origin for foreign-born residents living in Idaho. Approximately half of all foreign-born residents are from Mexico (Central America), with the next greatest share of foreign-born residents born in Asian and European countries, respectively. Of all foreign-born residents, around 40% are U.S. citizens.

[11] According to 2019 American Community Survey data.

Figure I-8.
Foreign-born Population, State of Idaho, 2019



Source: 2019 5-year ACS estimates.

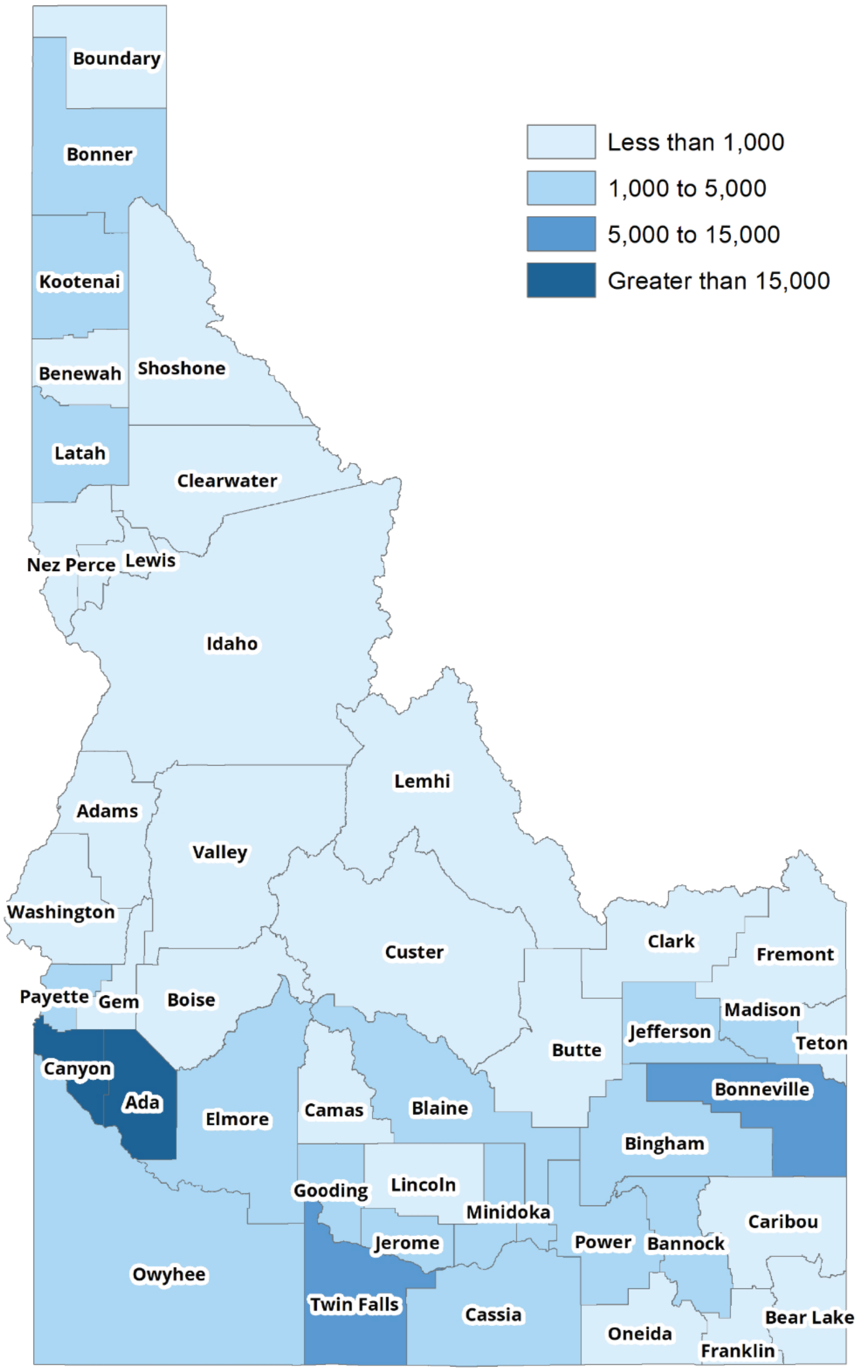
Figure I-9 shows the population of foreign-born residents by county and the change in residents between 2014 and 2019. Overall, the State of Idaho has experienced a net gain of nearly 7,000 foreign-born residents. Forty-one percent of these residents live in Ada County, while Twin Falls, Bannock, and Latah Counties account for the next greatest proportions. While there was a net gain of foreign-born residents between 2014-2019, 17 counties lost nearly 3,000 foreign-born residents collectively, with Bingham County losing nearly 1,200 foreign-born residents alone. Of all foreign-born Idahoans, close to half live in Ada and Canyon Counties (43%). The next greatest proportion of these residents reside in Twin Falls (7%) and Bonneville (6%) counties, respectively.

Figure I-9. Foreign-born Population by County, 2014 and 2019

Source:
2014 and 2019 5-year ACS estimates.

County	2014	2019	2014-2019 Numerical Change	2014-2019 Percent Change
Metro				
Ada	23,878	26,655	2,777	12%
Bannock	2,633	3,512	879	33%
Boise	152	248	96	63%
Bonneville	5,683	6,094	411	7%
Butte	78	17	-61	-78%
Canyon	16,983	17,286	303	2%
Franklin	447	343	-104	-23%
Gem	851	557	-294	-35%
Jefferson	1,159	1,071	-88	-8%
Kootenai	3,307	3,793	486	15%
Nez Perce	666	768	102	15%
Owyhee	1,230	1,123	-107	-9%
Nonmetro micropolitan				
Bingham	3,420	2,233	-1,187	-35%
Blaine	2,922	3,506	584	20%
Bonner	750	1,035	285	38%
Camas	140	22	-118	-84%
Cassia	2,331	2,529	198	8%
Elmore	2,557	2,610	53	2%
Fremont	694	777	83	12%
Jerome	3,921	3,900	-21	-1%
Latah	1,641	2,409	768	47%
Lincoln	672	832	160	24%
Madison	1,805	1,807	2	0%
Minidoka	2,696	2,977	281	10%
Payette	1,321	1,678	357	27%
Teton	1,156	894	-262	-23%
Twin Falls	6,449	7,619	1,170	18%
Nonmetro noncore				
Adams	37	48	11	30%
Bear Lake	107	185	78	73%
Benewah	133	110	-23	-17%
Boundary	267	506	239	90%
Caribou	232	211	-21	-9%
Clark	208	302	94	45%
Clearwater	177	183	6	3%
Custer	92	25	-67	-73%
Gooding	2,319	1,951	-368	-16%
Idaho	183	217	34	19%
Lemhi	107	175	68	64%
Lewis	96	84	-12	-13%
Oneida	81	130	49	60%
Power	950	1,169	219	23%
Shoshone	257	148	-109	-42%
Valley	133	71	-62	-47%
Washington	714	633	-81	-11%
State of Idaho	**95,635**	**102,443**	**6,808**	**7%**

Figure I-10.
Spatial Distribution of Foreign-born Residents by County, 2019



Source: 2019 5-year ACS estimates.

Residents with language diversity. The vast majority of residents in Idaho speak English fluently. Approximately 2% of Idaho households had no one over the age of 14 who spoke English very well in 2019, similar to the proportions in 2014. Residents living in such households are called "Limited English Proficiency" populations, or LEP. Idaho's 2019 LEP population is just slightly lower than Oregon and about 2 percentage points lower than Washington (4%).

The proportion of LEP residents in Idaho has declined significantly since 1990, when 5% of residents could not speak English "very well". Figure I-11 shows the top languages spoken in Idaho and by LEP status.

The vast majority of the state's residents speak only English (89%). Of those who speak a language other than English, 63% are bilingual and do not need language assistance. The remainder, 37% or 57,690 residents, likely need translation or interpretation in some circumstances. Spanish is by far the most common language spoken by Idaho residents with language assistance needs.

Figure I-11.
Ten Top Languages Spoken, State of Idaho, 2019

		Number		Percent	
Language Spoken	Total Number	Speak English "very" well	Speak English less than "very well"	Speak English "very" well	Speak English less than "very well"
Total Population	**1,603,389**				
Speak only English	1,429,104				
Speak a language other than English	156,076	98,386	57,690	63%	37%
Top Ten Languages					
Spanish	130,162	81,181	48,981	62%	38%
Chinese (incl. Mandarin, Cantonese	4,921	2,629	2,292	53%	47%
Arabic	3,876	1,682	2,194	43%	57%
German	3,604	2,995	609	83%	17%
French (incl. Cajun)	2,675	2,315	360	87%	13%
Other Native North American	2,500	2,206	294	88%	12%
Tagalog	2,438	1,783	655	73%	27%
Serbo-Croatian	2,219	1,575	644	71%	29%
African languages	1,881	1,283	598	68%	32%
Vietnamese	1,800	737	1,063	41%	59%

Note: Census data do not distinguish among some languages; the above figure shows the Census language categories.

Source: 2019 5-year ACS estimates.

Household Composition

Federal familial status protections apply to families with children, a person who is pregnant, and anyone in the process of securing legal custody of any individual who is not yet 18 years old. Although all families with children are protected under federal law, this section focuses on the two family types that typically face the greatest housing challenges: single parent households and large families.

Single parent households, especially those with single mothers, have some of the highest rates of poverty in most communities. As such, they generally have greater needs for social services (childcare, transportation, etc.). Single parent households often have fewer choices in the housing market and a higher need for affordable housing because of their lower income levels and need for family-friendly housing (larger units, proximity to schools, near parks/playgrounds). Large households also have difficulty finding homes, especially rentals that meet their affordability and space needs, and are family-friendly.

Figure I-12 shows the household composition for the State of Idaho. Of the nearly 656,000 households in Idaho, approximately 450,000 households, or 68%, are comprised of related individuals living together ("family" households). The remaining 207,000 nonfamily households include single people living alone and people living with roommates or partners.

The U.S. Census Bureau defines a family as a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together. Of the state's family households, the majority are married-couple households. Most of these households do not have children living in the home. Single-parent households make up 14% of all households, while cohabitating couple households make up 7% of households overall. Of those single parent households, 66% are female householders. For single parent households with children under 18 years old, nearly 70% are comprised of single female households.

The share of married-couple households as a proportion of total family households has continued to decrease over the last thirty years. In 1990, 86% of the state's families were made up of married-couple families while in 2014, 80% of families were married couples. By 2019, this had declined to 76%. This decline can be attributed to the continued growth in single-parent families.

Figure I-12.
Household Composition, State of Idaho, 2014 and 2019

County	2014	2019	2014-2019 Numerical Change	2014-2019 Percent Change
Family Households	**407,499**	**448,979**	**41,480**	**10%**
Married households	324,619	357,453	32,834	10%
With Children under 18 years	131,599	144,669	13,070	10%
Without Children	193,020	212,784	19,764	10%
Single Head of Household	82,880	91,526	8,646	10%
Female Householder	55,305	60,694	5,389	10%
With Children under 18 years	33,015	30,673	-2,342	-7%
Without Children	22,290	30,021	7,731	35%
Male Householder	27,575	30,832	3,257	12%
With Children under 18 years	15,610	14,016	-1,594	-10%
Without Children	11,965	16,816	4,851	41%
Nonfamily Households	**184,088**	**206,880**	**22,792**	**12%**
Living alone	151,201	161,580	10,379	7%
Living with roomate/partner	32,887	45,300	12,413	38%
State of Idaho	**591,587**	**655,859**	**64,272**	**11%**

Source: 2014 and 2019 5-year ACS estimates.

In 2019, 7% of Idaho's households had five or more household members, a five percentage point decrease since 2014. Over the last five years, the proportion of large households who own their homes decreased by eight percentage points (72% in 2019, 80% in 2014). Statewide, the percentage of owner households has slightly increased since 2014 (70% in 2019, 68% in 2014).

Residents with Disabilities

Fourteen percent of residents in the State of Idaho have one or more disabling conditions, a two percentage point increase since 1990.

Persons with disabling conditions are typically more vulnerable to housing discrimination due to housing providers' lack of knowledge about reasonable accommodation provisions in fair housing laws. Persons with disabling conditions also face challenges finding housing that is affordable, accessible, and located near transit and supportive services.

Figure I-13 shows the ages of persons living with disabling conditions in Idaho, along with condition type. Of all Idahoan residents 65 years and older, 35% experience at least one disabling condition. The most common disabling conditions for residents 65 years and older are hearing and ambulatory. Seven percent of children between the ages of 5 and 17 have disabling conditions, with the most common disabling condition being cognitive.

Figure I-13. Incidence of Disability by Age, State of Idaho, 2019

Source: 2019 1-year ACS estimates.

	Number	Percent of Age Cohort with Disability
Total Population with a Disability	**241,391**	**14%**
Population 5 years and younger	**1,063**	**1%**
Hearing	103	0%
Vision	960	1%
Population 5 to 17 years	**20,065**	**6%**
Hearing	1,947	1%
Vision	2,280	1%
Cognitive (under 18)	14,814	4%
Ambulatory (under 18)	2,569	1%
Self-care (under 18)	4,102	1%
Population 18 to 64 years	**121,908**	**12%**
Hearing	27,334	3%
Vision	22,142	2%
Cognitive	56,065	5%
Ambulatory	51,911	5%
Self-care	16,493	2%
Independent living	38,429	4%
Population 65 years and over	**98,355**	**35%**
Hearing	53,458	19%
Vision	15,825	6%
Cognitive	20,209	7%
Ambulatory	54,370	19%
Self-care	14,323	5%
Independent living	31,320	11%

Residents living in Poverty

Eleven percent of Idaho's residents—about 196,000—live in poverty. This is a markedly significant decrease from 2014, when the poverty rate was 15.6%—a drop of 4.4 percentage points. Idaho's current poverty rate is similar to nearby Oregon (11.4%) and slightly lower than the nation overall (12.3%).[12]

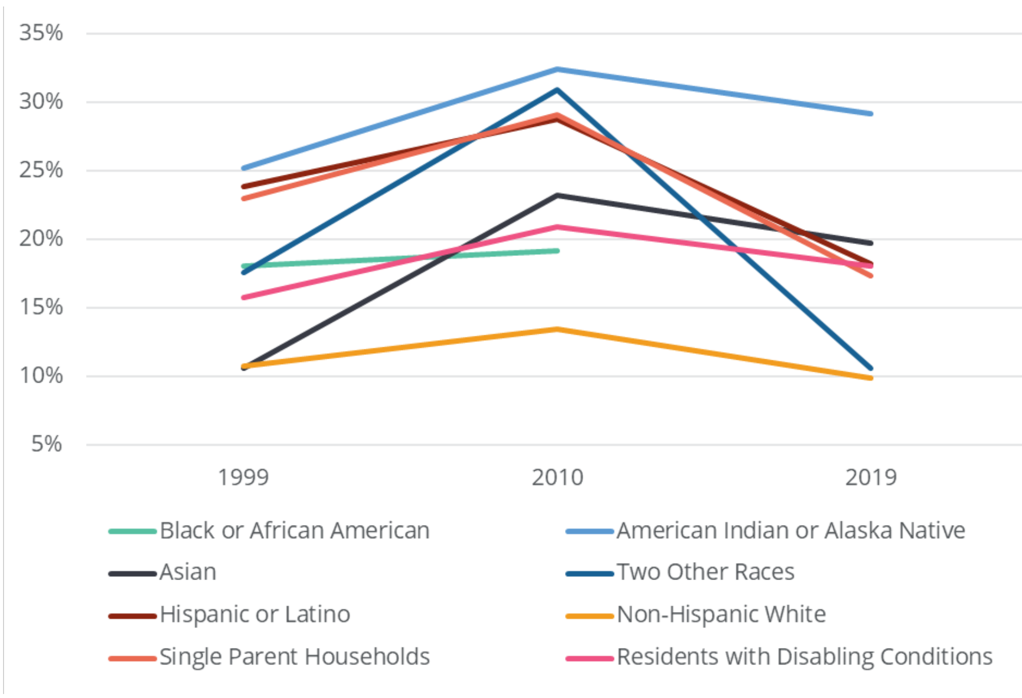
The U.S. Census has collected data on the number of persons living in poverty for many decades. In 1969, approximately 92,000 Idaho residents lived in poverty—nearly 14% of all

[12] The poverty threshold is set at the federal level and varies by household size. It is roughly $26,000 for a family of four.

residents. Figure I-14 shows the poverty rate trends over the last few decades for a variety of demographic categories including race and ethnicity, single parent households, and residents experiencing disabling conditions. For most groups, poverty rates spiked during the Great Recession, and have since fallen, dramatically for some. Resident groups with less fluctuation include Native American, Non-Hispanic White, Asian, and residents with disabling conditions.

Figure I-15 shows the same trends for Idaho and its respective peer states. As of 2019, Idaho's poverty rate falls within the middle of the pack among the other states. Accordingly, since the Great Recession between 2007 and 2010, Idaho's poverty rate has been declining over the last decade.

Figure I-14.
Poverty Rate Trends by Race and Ethnicity, Household Composition and Poverty Status, State of Idaho, 1999, 2010 and 2019



Note: Native Hawaiian and Other Pacific Islander trend lines are not included because the sample cases for Idaho (2010 and 2019) are too small, as well as for Black or African American residents in 2019.

Source: 2010 and 2019 1-year estimates; 2000 Decennial Census.

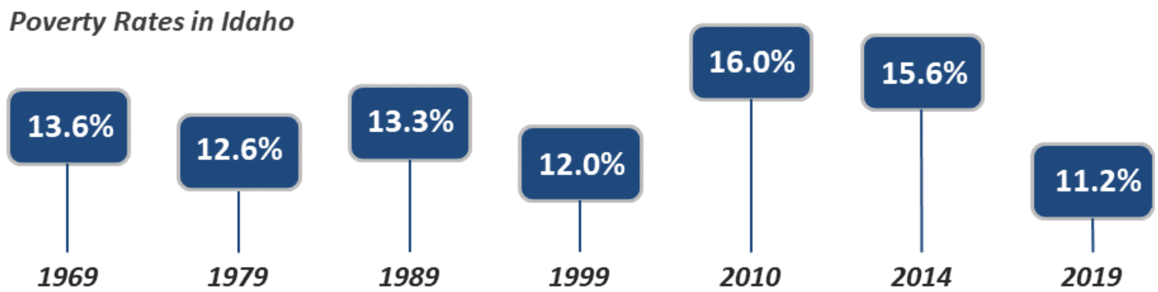
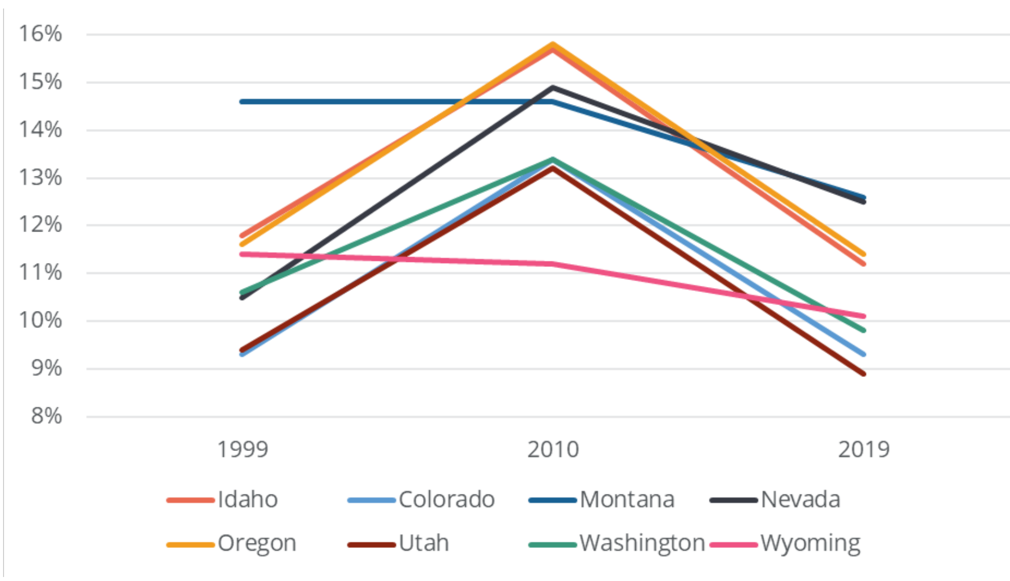


Figure I-15.
Poverty Rate Trends, State of Idaho and Peer States, 1999, 2010 and 2019



Source: 2010 and 2019 1-year estimates; 2000 Decennial Census.

Figure I-16 illustrates poverty by age. Children under the age of 18 in Idaho are most likely to live in poverty, with 13% living in families with incomes below the poverty threshold. When further segmented, children under 5 years old face even more striking rates of poverty. Nearly 60% of counties in Idaho have poverty rates of at least 20% for children under five. Outside of populations younger than 18, the next highest poverty rates are experienced by young adults (18-35 years old). Residents over 65 years old have the lowest poverty rates in Idaho.

Figure I-16.
Poverty by Age, State of Idaho, 2019

Source:
2019 1-year ACS estimates.

	Number for Whom Poverty Status is Determined	Number Below Poverty Level	Percent Below Poverty Level
Total Population	**1,753,946**	**195,984**	**11%**
Population under 18 years	441,454	58,188	13%
Under 5 years	113,919	20,268	18%
5 to 17 years	327,535	37,920	12%
Population 18 to 64 years	1,028,622	118,285	11%
Population 65 years and over	283,870	19,511	7%

Figure I-17 illustrates poverty by county. Pertinent findings are discussed below.

- Butte County has the highest poverty rate among Metro counties (18%). Only Jefferson County (7%) has a poverty rate less than 10%.
- Madison County has the highest poverty rate among nonmetro micropolitan counties, as well as the state (31%). However, the county's poverty rate is skewed by the college student population at BYU-Idaho, located in Rexburg (49% for the county's young adult population). Jerome County has the next highest poverty rate (19%).
- Similarly, Latah County's high overall poverty rate (18%) is due to the poverty rate for young adults (36%), which is mainly influenced by the student population at the University of Idaho in Moscow.
- Boundary and Shoshone Counties have the highest poverty rates (19%) in nonmetro noncore counties. As previously noted, these rates are directly attributed to the high poverty rates experienced by the counties' young population.

Figure I-17.
Poverty Rate by County, 2019

Source:
2019 5-year ACS estimates.

County	2019
Metro	
Butte	18%
Gem	17%
Bannock	16%
Owyhee	16%
Canyon	13%
Nez Perce	13%
Kootenai	12%
Ada	11%
Boise	11%
Bonneville	10%
Franklin	10%
Jefferson	7%
Nonmetro micropolitan	
Madison	31%
Jerome	19%
Latah	18%
Minidoka	17%
Camas	16%
Bonner	15%
Elmore	15%
Cassia	14%
Twin Falls	14%
Blaine	13%
Fremont	13%
Payette	13%
Lincoln	12%
Bingham	11%
Teton	4%
Nonmetro noncore	
Boundary	19%
Shoshone	19%
Custer	18%
Benewah	17%
Bear Lake	17%
Gooding	16%
Lewis	16%
Idaho	14%
Clark	13%
Clearwater	13%
Washington	13%
Adams	12%
Lemhi	12%
Oneida	11%
Power	11%
Caribou	9%
Valley	7%
State of Idaho	11%

Neighborhoods with poverty rates exceeding 40% are regarded by social researchers as being areas that are “socially and economically dysfunctional.”[13] High poverty is linked to high crime, high rates of unemployment and low educational attainment, all of which have costs to the public. High poverty also impacts community health and food security, frequently culminating in malnutrition among children.[14]

Figure I-18 displays two measures of poverty concentration:

- Areas where the poverty rate exceeds 40%; and
- Areas where the poverty rate is three times the county average.

As shown in Figure I-18, concentrated neighborhoods with high poverty—defined as those where more than 40% of individuals live in poverty—are found in Boise, Pocatello, and Rexburg. All of these cities are home to major colleges and universities. The higher-than-average poverty rates are related to the presence of students who typically have lower wages.

Except for these areas—where high poverty is a function of the presence of college students—the State of Idaho has no neighborhoods where poverty rates reach a very high, concentrated level.

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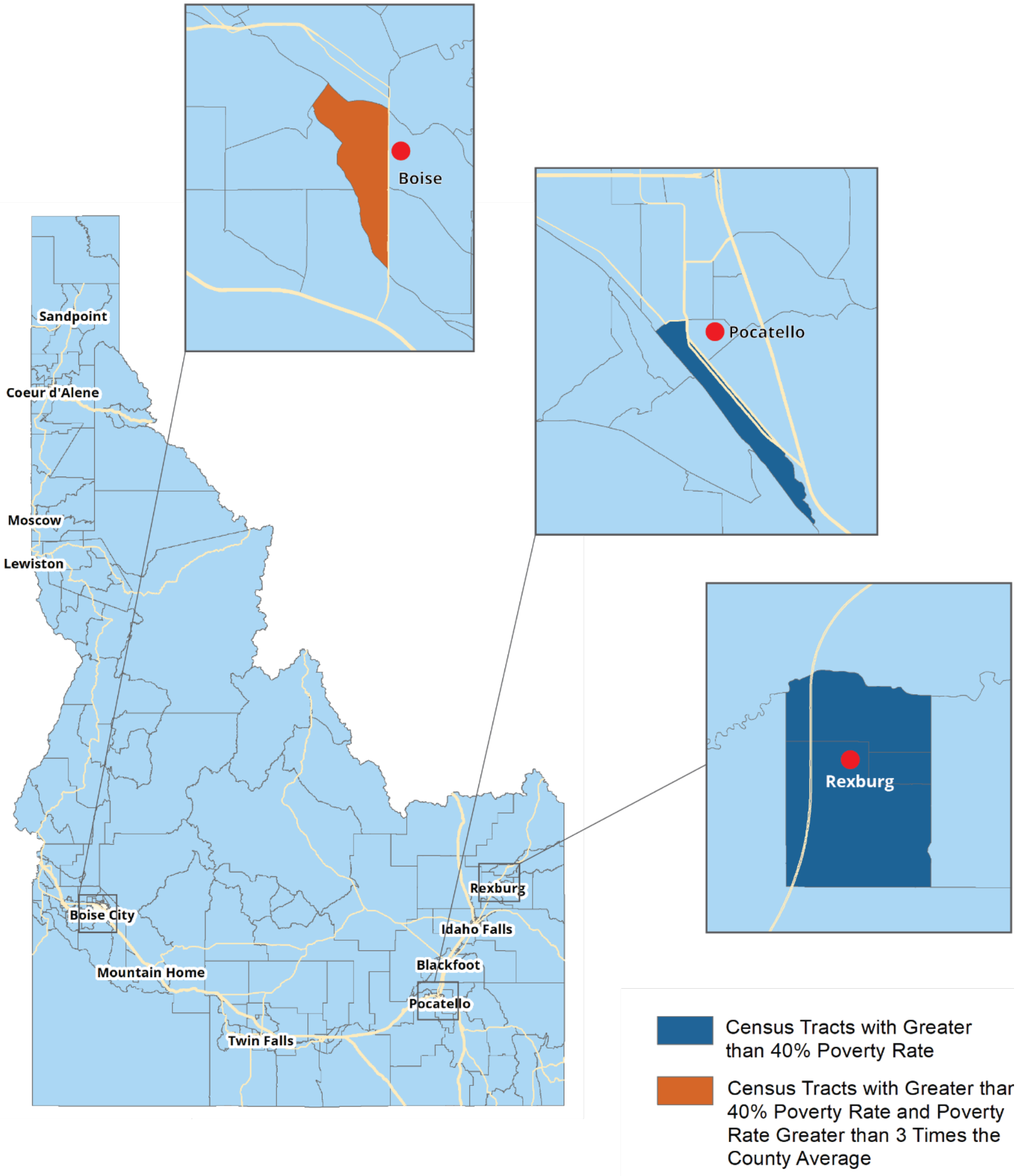
[13] The Costs of Concentrated Poverty: Neighborhood Property Markets and the Dynamics of Decline.” In Nicolas P. Retsinas and Eric S. Belsky, eds., Revisiting Rental Housing: Policies, Programs, and Priorities. Washington, DC: Brookings Institution, 116–9.

[14] Understanding the Link between Poverty and Food Insecurity among Children: Does the Definition of Poverty Matter? Vanessa Wright, et. al., Journal of Children and Poverty, 1-20. 2014.

Figure I-18.
Poverty Concentrations by Census Tract, State of Idaho, 2019



Source: 2019 5-year ACS estimates.

Segregation/Integration Analysis

This section discusses racial and ethnic segregation/integration in Idaho. According to HUD, "segregation" occurs when protected classes are spatially concentrated as a result of fair housing barriers. HUD defines "integrated" geographic areas as those which do not contain high concentrations of protected classes when compared to their representation in a jurisdiction as a whole: "Integration" is a "condition…in which there is not a high concentration."[15]

Metrics. This analysis uses several measures to identify segregation:

Geospatial analysis, or examining patterns in maps, is the first step in identifying spatial concentrations of residents by protected class (race, ethnicity, national origin, familial status and disability). Geospatial analysis is conducted at the census tract level for every Census tract in the state. The data represent the 2015-2019 5-year period and is the latest data available for all counties in Idaho.

The geospatial analysis at the state level uses two definitions of "concentrations:"

- Census tracts that are more than 50% minority. Minority residents are defined as those residents identifying as Hispanic/Latino and/or a non-White race. This definition is consistent with HUD's definition of a "majority minority" area. HUD recommends identifying these areas as a starting point for segregations analyses.

- Census tracts in which the proportion of a protected class is 20 percentage points higher than that in the county or state overall. This definition helps to normalize the distribution of residents by race and ethnicity to the distribution that exists county- or statewide. It helps to identify concentrations in majority non-Hispanic White areas.

The Diversity Index (DI) measures the evenness of minority resident distribution compared to non-Hispanic White residents across Census tracts in a county.

An additional component of fair housing studies is an analysis of "racially or ethnically concentrated areas of poverty," also called R/ECAPs. A Racially or Ethnically Concentrated Area of Poverty is a neighborhood with significant concentrations of high poverty and is majority-minority. Based on the 2015-2019 ACS data, no R/ECAPs exist in Idaho.[16] While

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15 Affirmatively Furthering Fair Housing Rule Guidebook, Version 1, December 31, 2015, U.S. Department of Housing and Urban Development.

16 Households within R/ECAP tracts frequently represent the most disadvantaged households within a community and often face a multitude of housing challenges. By definition, a significant number of R/ECAP households are financially burdened, which severely limits housing choice and mobility. The added possibility of racial or ethnic discrimination creates a situation where R/ECAP households are more likely more susceptible to discriminatory practices in the

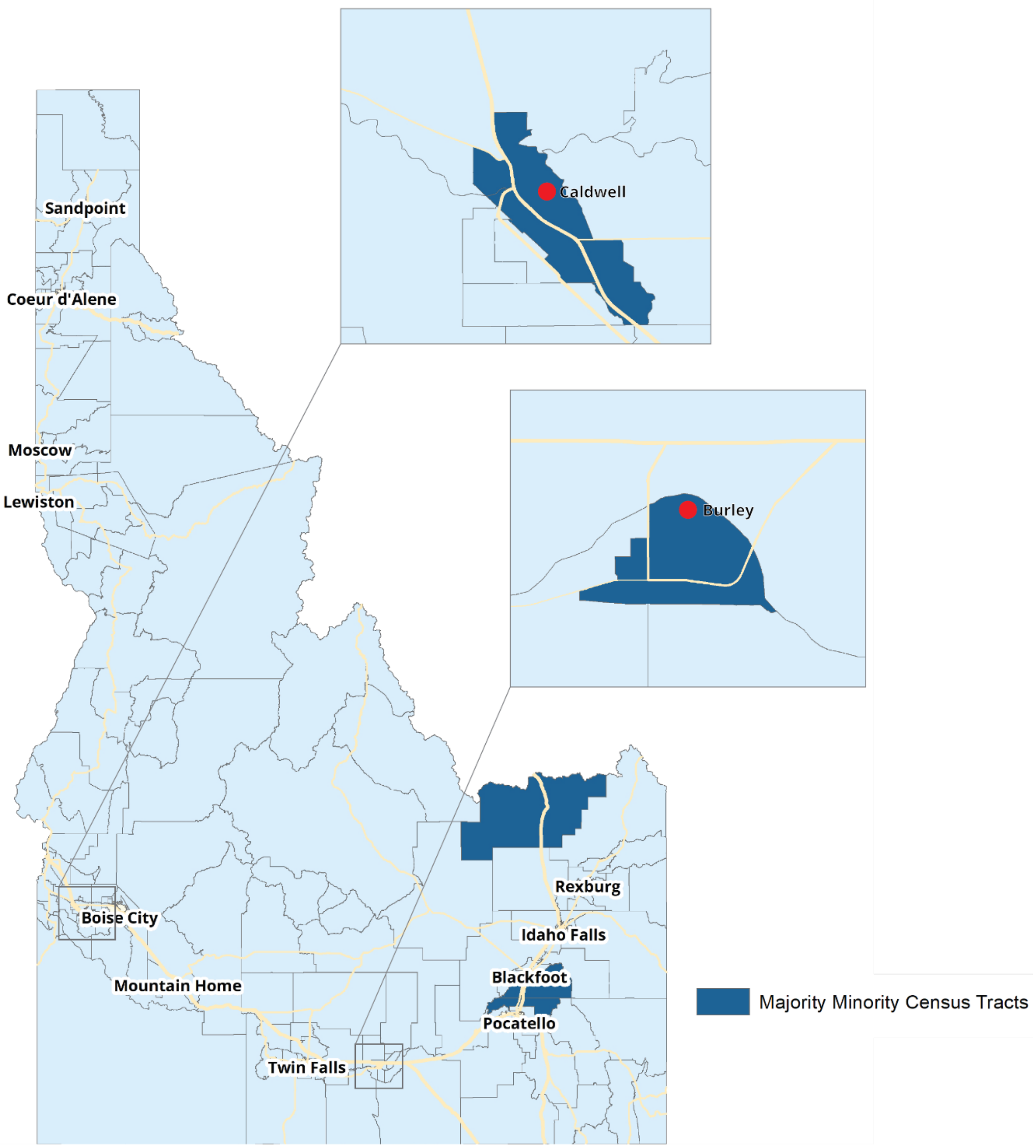
there are a handful of neighborhoods with high poverty rates and concentrations of minority populations, no neighborhood meets the definition of a R/ECAP. Overall, high poverty neighborhoods in Idaho represent the general composition of races and ethnicities of residents in the state.

Three R/ECAPs were found in the last AI, conducted in 2016, and no longer R/ECAPs due to declines in poverty rates.

Racial/ethnic concentrations. Figure I-19 shows where majority-minority areas occur in Idaho. The largest majority-minority concentrations in the state are adjacent areas in southern Bingham County and northern Bannock County in the southeastern part of Idaho. The Fort Hall Reservation, home to the Shoshone-Bannock Tribes, is located in portions of both Bannock and Bingham Counties. Additionally, Canyon County (Caldwell), Cassia County (Burley), and Clark County all have majority-minority Census tracts. Hispanic residents make up the greatest share of the population in each of the aforementioned tracts.

housing market. Additionally, due to financial constraints and/or lack of knowledge (i.e. limited non-English information and materials); R/ECAP households encountering discrimination may believe they have little or no recourse, further exacerbating the situation. According to 2019 ACS data, there are no Racially/Ethnically Concentrated Areas of Poverty (R/ECAP) in the state of Idaho.

Figure I-19.
Majority Minority Concentrations, State of Idaho, 2019



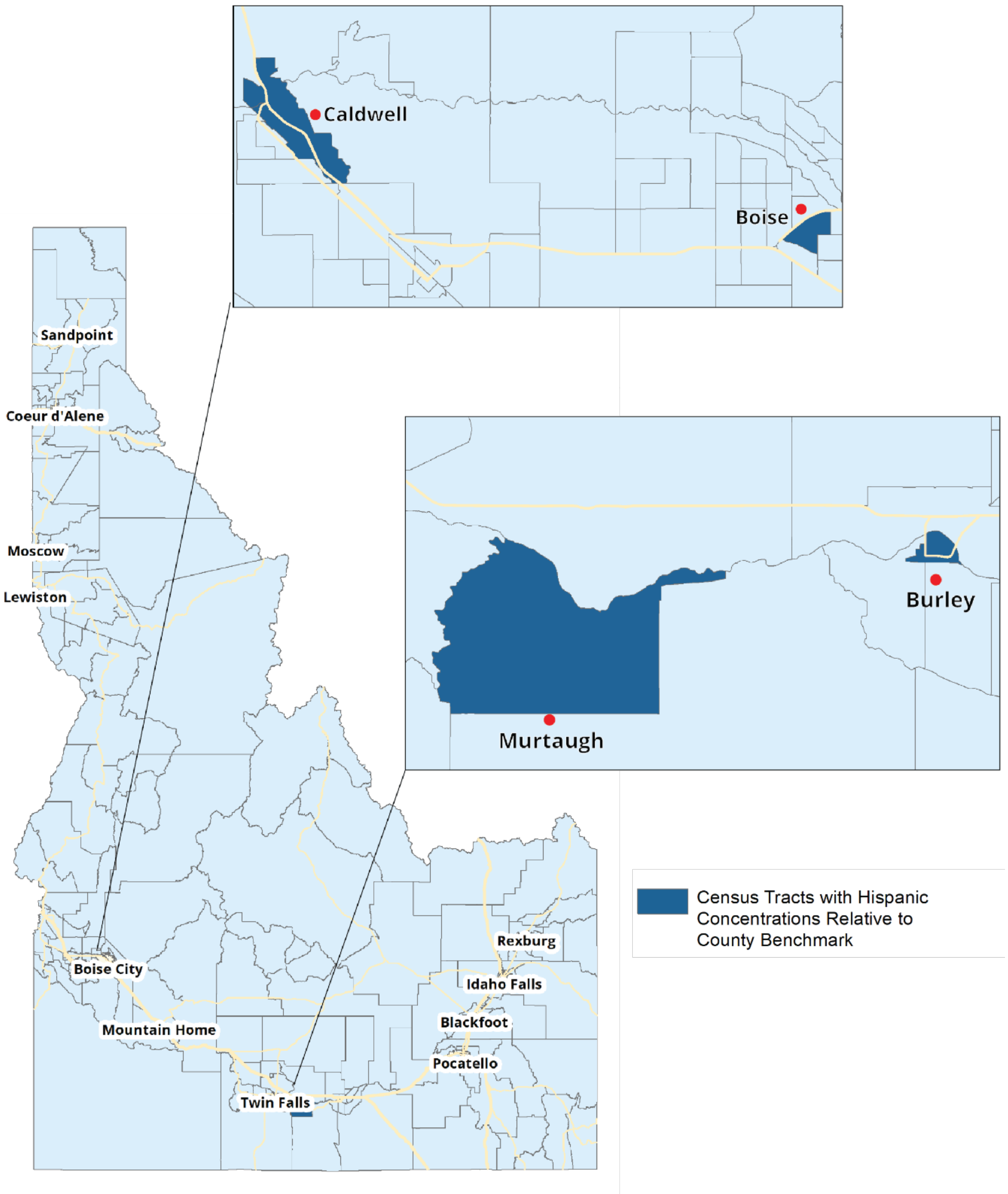
Source: 2019 5-year ACS estimates.

The following two maps show where Hispanic concentrations occur in the state using a county benchmark and a state benchmark.

- The county benchmark compares the proportion of residents in a Census tract to the proportion in the county overall. This comparison identifies where neighborhood (as shown by Census tract) concentrations occur.
- The state benchmark compares Census tract concentrations to the state proportion. Since the state threshold is lower than that in ethnically diverse counties, the second map reveals a more pronounced pattern of Hispanic concentrations.

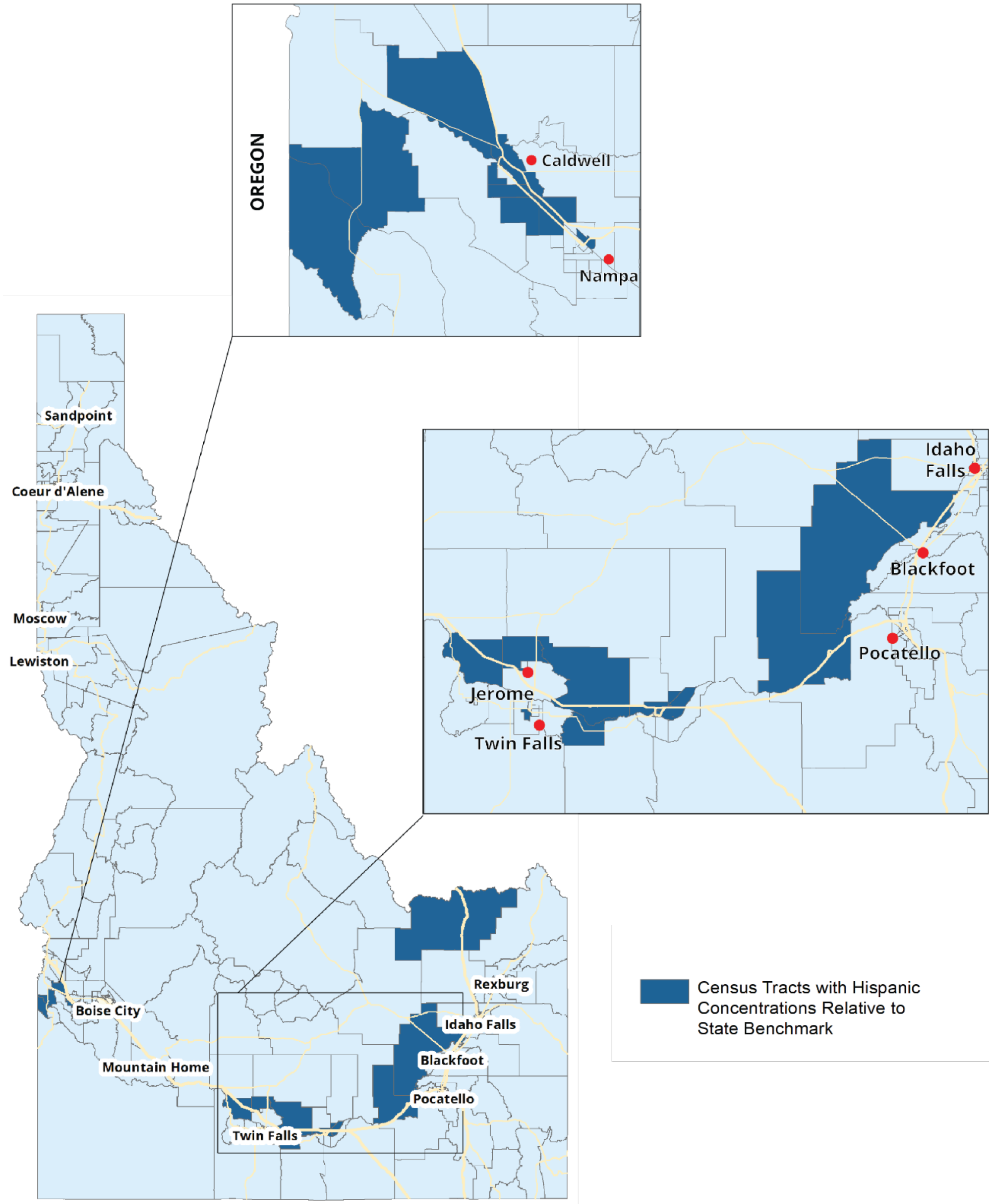
Figure I-20 shows that when compared to each respective county benchmark, Hispanic residents are concentrated in five neighborhoods, located in Ada and Twin Falls Counties. When compared to the state benchmark (Figure I-21), concentrations of Hispanic residents become more distinct. These concentrations are located within and around Caldwell, Nampa, Jerome, Twin Falls, Pocatello, Idaho Falls, and Clark County.

Figure I-20.
Hispanic Concentrations Relative to County Benchmark, State of Idaho, 2019



Source: 2019 5-year ACS estimates.

Figure I-21. Hispanic Concentrations Relative to State Benchmark, State of Idaho, 2019



Source: 2019 5-year ACS estimates.

Diversity index. The “dissimilarity index”, or diversity index, is a metric used by researchers to measure racial and ethnic integration. The index is measured between 0 and 1. An index of 0 indicates perfect distribution of racial and ethnic groups across all Census tracts in a region; conversely, an index of 1 indicates complete segregation of racial groups across the region. HUD’s ratings of dissimilarity are determined by the following score ranges: “Low Dissimilarity”—below 0.40; “Moderate”—between 0.40 and 0.54; and “High”—above 0.54. In 2020, the U.S. cities found to be the most segregated using the dissimilarity index (Milwaukee, Detroit and New York) have indices approaching 0.75.

Figure I-22 presents the dissimilarity index for Idaho counties. The index for Idaho non-White Hispanic (“minority”) populations is low in every county in Idaho, indicating low segregation for minority residents overall. Additionally, Hispanic residents, the largest minority population in the state, experience low levels of segregation in each county throughout the state.

However, this does not hold true for other minority groups in Idaho. In 27% of the state’s counties, African Americans face high levels of segregation, with residents in Jerome, Bingham, and Payette Counties facing the highest levels of segregation. In over 60% of Idaho counties, African American residents face moderate or high levels of segregation according to the index. Native Americans also face comparatively moderate and high levels of segregation, which can generally be attributed to the presence of a reservation. This can also lead to high levels of segregation of other races, who are concentrated in areas adjacent to the reservation.

Asian residents also face moderate or high levels of segregation in a quarter of Idaho counties. Asian residents face the highest levels of segregation in Valley, Minidoka, Shoshone, Jefferson, and Bingham Counties. Additionally, multi-race residents face low levels of segregation in all Idaho counties except for Cassia and Caribou Counties Counties. (For Valley County, the populations are not large enough for the index to be significant).

For African Americans, Asian, and multi-race residents, the high levels of segregation can be attributed to concentrations of residents in a handful of —sometimes just one—Census tracts. For example, the high level of segregation facing African American residents in Bingham County is due to their location in just two of the eight Census tracts. In Jefferson County, 96% of Asian residents live predominantly in two of the county’s five Census tracts.

Figure I-22.
Dissimilarity Index by County, 2019

County	Minority/NHW Dissimilarity Index		Hispanic/NHW Dissimilarity Index		African American/NHW Dissimilarity Index		Asian/NHW Dissimilarity Index		Native American/NHW Dissimilarity Index		Multirace/NHW Dissimilarity Index	
	Index	Rating	Index	Rating	Index	Rating	Index	Rating	Index	Rating	Index	Rating
Ada County	0.16	Low	0.20	Low	0.50	Moderate	0.32	Low	0.55	High	0.17	Low
Adams County*	0.08	Low	0.20	Low	0.39	Low	N/A	N/A	0.22	Low	0.13	Low
Bannock County	0.19	Low	0.21	Low	0.48	Moderate	0.38	Low	0.68	High	0.30	Low
Bear Lake County*	0.03	Low	0.04	Low	0.01	Low	0.00	Low	0.57	High	0.14	Low
Benewah County	0.37	Low	0.37	Low	0.50	Moderate	0.29	Low	0.50	Moderate	0.25	Low
Bingham County	0.30	Low	0.24	Low	0.72	High	0.60	High	0.76	High	0.19	Low
Blaine County	0.20	Low	0.24	Low	0.67	High	0.34	Low	0.70	High	0.30	Low
Boise County*	0.00	Low	0.00	Low	0.00	Low	0.00	Low	0.00	Low	0.00	Low
Bonner County	0.10	Low	0.15	Low	0.55	High	0.30	Low	0.49	Moderate	0.12	Low
Bonneville County	0.23	Low	0.25	Low	0.62	High	0.36	Low	0.51	Moderate	0.33	Low
Boundary County	0.07	Low	0.18	Low	0.57	High	0.34	Low	0.23	Low	0.26	Low
Butte County*	0.00	Low	0.00	Low	0.00	Low	N/A	N/A	N/A	N/A	N/A	N/A
Camas County*	0.00	Low	0.00	Low	N/A	N/A	N/A	N/A	N/A	N/A	0.00	Low
Canyon County	0.22	Low	0.26	Low	0.53	Moderate	0.33	Low	0.35	Low	0.24	Low
Caribou County*	0.07	Low	0.29	Low	N/A	N/A	0.13	Low	0.63	High	0.47	Moderate
Cassia County	0.20	Low	0.21	Low	0.50	Moderate	0.39	Low	0.55	High	0.56	High
Clark County*	0.00	Low	0.00	Low	0.00	Low	N/A	N/A	0.00	Low	N/A	N/A
Clearwater County*	0.18	Low	0.18	Low	0.10	Low	0.36	Low	0.36	Low	0.03	Low
Custer County*	0.00	Low	0.00	Low	0.00	Low	N/A	N/A	0.00	Low	0.00	Low
Elmore County	0.12	Low	0.13	Low	0.18	Low	0.31	Low	0.23	Low	0.13	Low
Franklin County	0.01	Low	0.01	Low	0.51	Moderate	0.06	Low	0.51	Moderate	0.36	Low
Fremont County	0.08	Low	0.09	Low	0.14	Low	0.36	Low	0.36	Low	0.16	Low
Gem County	0.21	Low	0.25	Low	0.42	Moderate	0.33	Low	0.19	Low	0.26	Low
Gooding County	0.09	Low	0.10	Low	0.52	Moderate	0.38	Low	0.33	Low	0.20	Low

Figure I-22. (Continued)
Dissimilarity Index by County, 2019

County	Minority/NHW Dissimilarity Index		Hispanic/NHW Dissimilarity Index		African American/NHW Dissimilarity Index		Asian/NHW Dissimilarity Index		Native American/NHW Dissimilarity Index		Multirace/NHW Dissimilarity Index	
	Index	Rating	Index	Rating	Index	Rating	Index	Rating	Index	Rating	Index	Rating
Idaho County	0.15	Low	0.23	Low	0.50	Moderate	0.40	Low	0.30	Low	0.19	Low
Jefferson County	0.15	Low	0.14	Low	N/A	N/A	0.61	High	0.48	Moderate	0.29	Low
Jerome County	0.11	Low	0.13	Low	0.74	High	0.42	Moderate	0.43	Moderate	0.28	Low
Kootenai County	0.20	Low	0.17	Low	0.54	High	0.40	Moderate	0.55	High	0.23	Low
Latah County	0.20	Low	0.24	Low	0.47	Moderate	0.25	Low	0.25	Low	0.19	Low
Lemhi County*	0.21	Low	0.25	Low	0.34	Low	N/A	N/A	0.42	Moderate	0.21	Low
Lewis County*	0.23	Low	0.20	Low	0.41	Moderate	0.41	Moderate	0.30	Low	0.05	Low
Lincoln County	0.00	Low	0.00	Low	N/A	N/A	0.00	Low	0.00	Low	0.00	Low
Madison County	0.18	Low	0.15	Low	0.64	High	0.49	Moderate	0.79	High	0.26	Low
Minidoka County	0.16	Low	0.15	Low	0.40	Moderate	0.67	High	0.40	Moderate	0.28	Low
Nez Perce County	0.38	Low	0.25	Low	0.68	High	0.38	Low	0.68	High	0.28	Low
Oneida County*	0.00	Low	0.00	Low	0.00	Low	N/A	N/A	0.00	Low	0.00	Low
Owyhee County	0.10	Low	0.15	Low	0.55	High	0.30	Low	0.44	Moderate	0.11	Low
Payette County	0.07	Low	0.10	Low	0.72	High	0.49	Moderate	0.48	Moderate	0.23	Low
Power County	0.23	Low	0.28	Low	0.60	High	N/A	N/A	0.19	Low	0.32	Low
Shoshone County	0.16	Low	0.22	Low	0.30	Low	0.61	High	0.22	Low	0.15	Low
Teton County	0.00	Low	0.00	Low	N/A	N/A	N/A	N/A	0.00	Low	0.00	Low
Twin Falls County	0.19	Low	0.22	Low	0.49	Moderate	0.48	Moderate	0.44	Moderate	0.34	Low
Valley County*	0.29	Low	0.38	Low	0.44	Moderate	0.67	High	0.58	High	0.33	Low
Washington County	0.20	Low	0.21	Low	0.49	Moderate	0.24	Low	0.22	Low	0.37	Low

Note: NHW is non-Hispanic White.

*Indicates that the county has a minority population that is lower than 1,000 residents, in which case the index should be interpreted with caution.

Source: 2019 5-year ACS estimates; Root Policy Research.

Foreign-born and Limited English Proficiency (LEP) populations. Foreign-born residents are most prominent within or near Pocatello, Nampa, Twin Falls, and Meridian. Foreign-born residents are clustered in a handful of Census tracts in all of the jurisdictions with relatively large numbers of foreign-born residents, particularly in Ada and Canyon Counties.

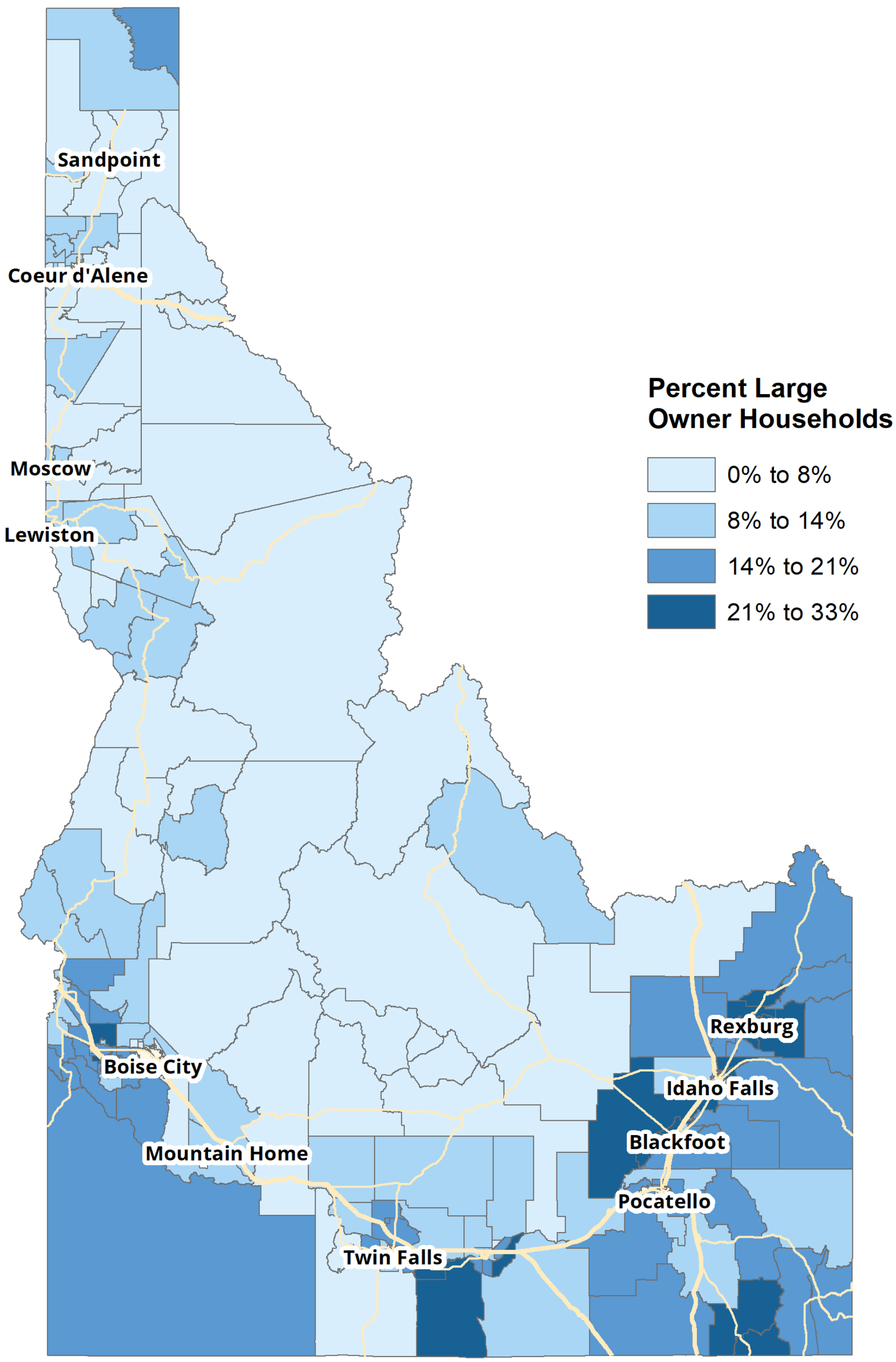
The greatest number of LEP households are located in or near Ketchum, Boise, and Twin Falls. The greatest proportion of LEP households relative to all households are located in the cities of Jerome, Twin Falls, and Caldwell and Clark County.

Large households. Figure I-23 and I-24 show the distribution of large households in the state by tenure (owner, renter). Statewide, 12% of households are large—the same proportion of large households in 2014. This is the same proportion for owner-occupied households, but slightly higher than renter-occupied households (11%).

The greatest proportion of large, owner-occupied households are located in neighborhoods in Madison and Bonneville Counties. These households represent between 28-33% of all owner-occupied households in their respective neighborhoods. Other areas with high proportions of large, owner-occupied households include neighborhoods outside of Nampa, Twin Falls, and Idaho Falls.

Overall, renter-occupied households have higher proportions of large households in neighborhoods around the state compared to owner-occupied households. Within and outside of Pocatello, Twin Falls, Rigby, and Caldwell, there are neighborhoods where the proportion of large, renter-occupied households exceed 40% of all rental households.

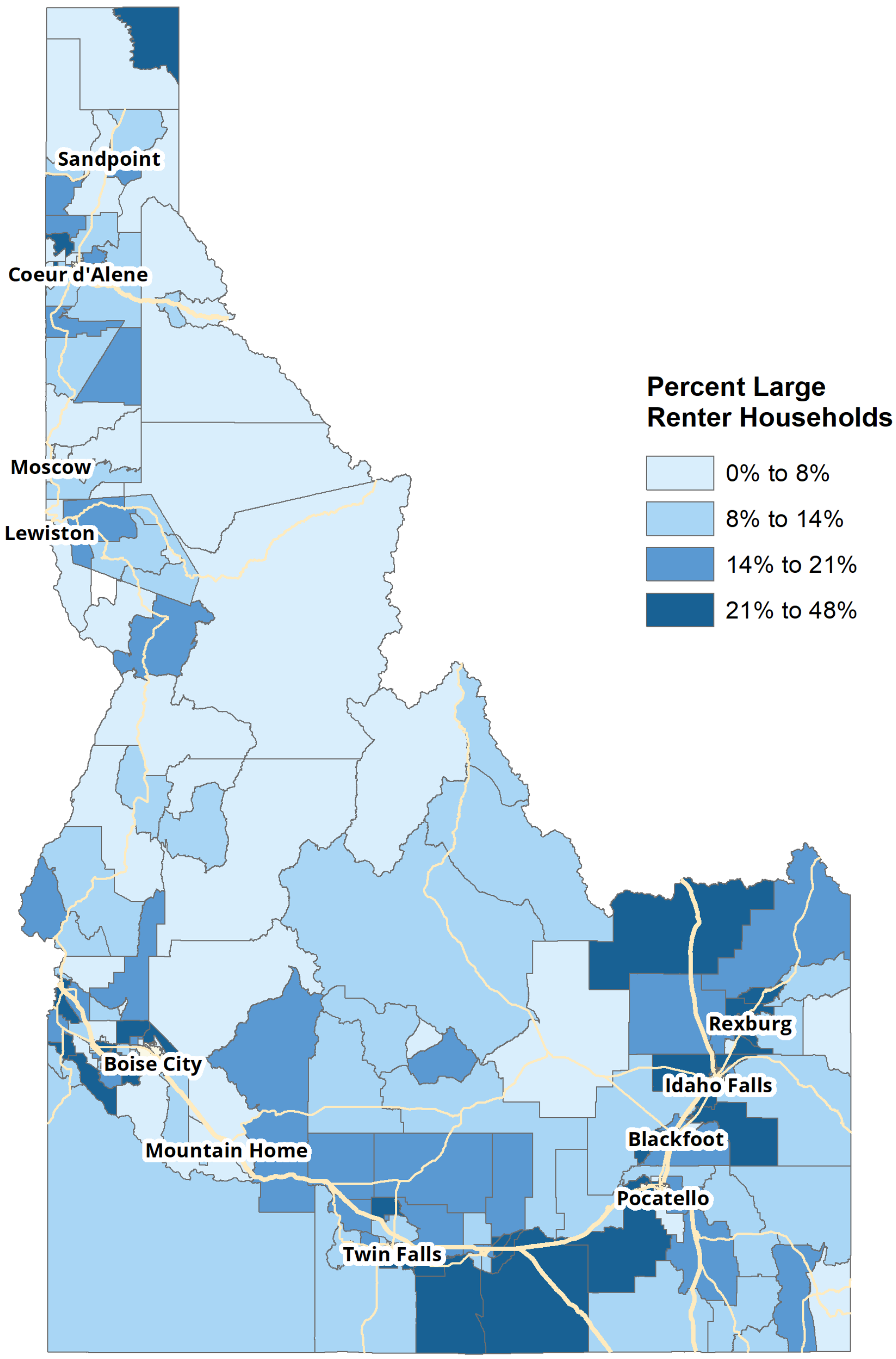
Figure I-23.
Large Owner Households, State of Idaho, 2019



Note: Statewide, 12% of owner-occupied households are considered large.

Source: 2019 5-year ACS estimates.

Figure I-24.
Large Renter Households, State of Idaho, 2019



Note: Statewide, 11% of renter-occupied households are considered large.

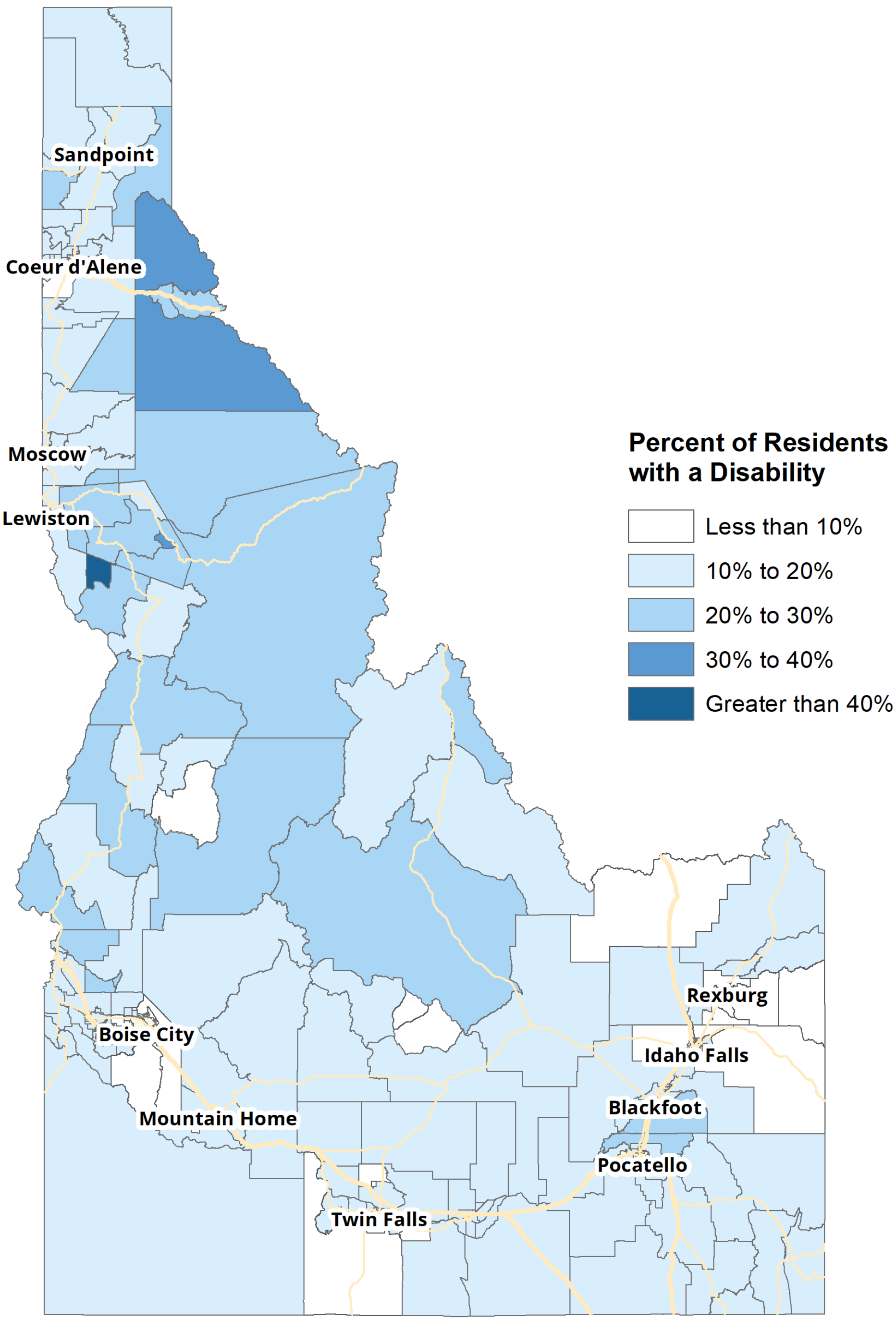
Source: 2019 5-year ACS estimates.

Disability rates. Figure I-25 shows the geographic distribution of persons with disabilities in Idaho. Statewide, 14% of Idaho residents have at least one disabling condition. When using the county concentration measure, there is only one concentrated Census tract (however, the population of the Census tract is quite small – 14 of the 26 people have at least one disabling condition). This Census tract also is considered to have a concentration of those with disabling conditions at the state level.

Disability concentrations are correlated with age much more than other protected-class characteristics. The Census tract outside Lewiston has the highest percent of residents experiencing disabling conditions.

Of the Census tracts with greater than 30% of people experiencing disabling conditions, all of those tracts have at least 22% of their population over the age of 65. The northern part of Idaho has a greater number of Census tracts with higher percentages of people with disabling conditions. This can be somewhat attributed to the presence of group homes—for example, Clearwater County is home to the state hospital in Orofino.

Figure I-25.
Disability Rates, State of Idaho, 2019



Note: Fourteen percent of Idaho residents report experiencing a disabling condition.

Source: 2019 5-year ACS estimates.

SECTION II.

HOUSING MARKET ANALYSIS

SECTION II.
Housing Market Analysis

This section of the Idaho Analysis of Impediments to Fair Housing Choice (AI) examines barriers to housing choice across Idaho.

The section begins with an overview of the housing stock, described by:

- Unit type,
- Tenure (owner/renter),
- Age of units, and
- Price trends.

It then turns to an analysis of:

- Affordability, including renters' inabilities to pay rent and risk of eviction;
- Access to ownership as measured through loan denial rates;
- Owners' non-mortgage payments and risk of foreclosure;
- Availability of housing stock, including homes vacant for sale or rent, and those used as second homes or vacation rentals. This includes some discussion of in-migrants and housing costs statewide.

This section concludes with an overview of the state's publicly supported housing.

Primary Findings

- From 2010 to 2019, Idaho has increased its overall housing stock by 11%, or by 71,271 units. The majority (70%) of occupied housing units in the state are occupied by homeowners rather than renters, and the majority (73%) of housing units are single-family detached.
- The median home value in Idaho rose 23% between 2010 and 2019—from $172,700 in 2010 to $212,300 in 2019. Rental price increases in the state overall were slightly higher than home value growth, rising 24% between 2010 and 2019. The median gross rent (which includes utilities) increased from $689 in 2010 to $853 in 2019.
- In-migration is correlated with an increase in rent costs, but not an increase in home values, suggesting that other factors—interest rates, lack of supply, demand for second homes—are driving increases in for sale home prices. In 2020, 8% of home loans in the entire state were for second homes, an increase of 2 percentage points from the 6% of loans in 2019 and 2018.

- Idahoans are less likely to be experiencing cost burden than those in the United States overall and in many peer states. Across Idaho, 46% of renters, 26% of homeowners with a mortgage, and 9% of homeowners without a mortgage are cost burdened.
- Even with high rates of cost burden among renters, according to 2016 data from the Princeton University Eviction Lab, the statewide eviction rate was just 0.6%, much lower than the national average of 2.3%.
- Overall,154,119 households applied for some type of mortgage loan in Idaho in 2020. Just 12% of applications were denied and 6% of mortgage loans made in Idaho were considered high-priced loans.
- Several Idahoans took advantage of the mortgage forbearance during the pandemic, with the peak in forborne home loans occurring in June 2020 where 5.2% of mortgages in Idaho were forborne. This is lower than the national average of 9.5% during the same month.
- In January 2021, the Point in Time Count identified 1,889 people (in 644 households) experiencing homelessness in Idaho. Forty-six percent of those individuals were not sheltered and just over half (54%) were sheltered.

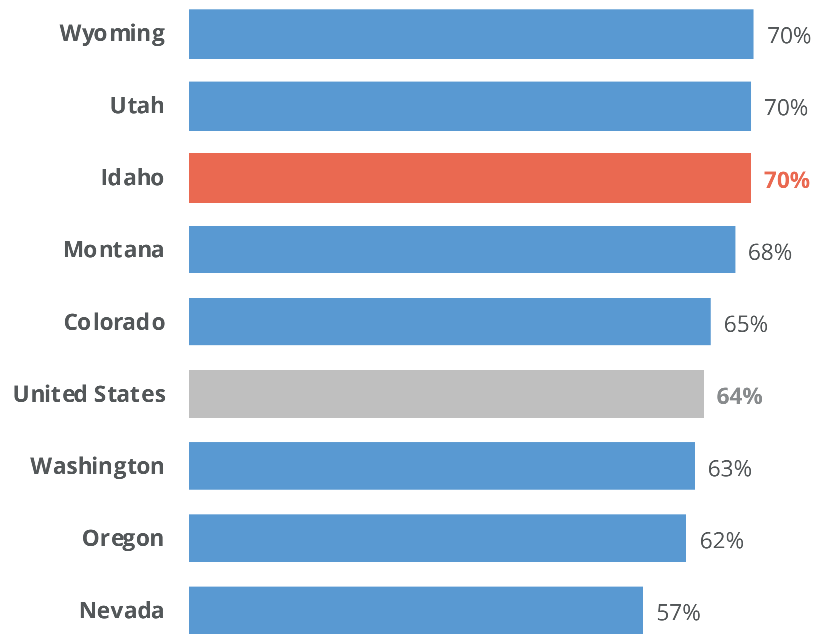
Housing Market Overview

This section presents a broad overview of housing trends by county. It includes an overall description of the housing landscape as well as price and corresponding income trends for both renters and owners.

Housing stock. According to 2019 American Community Survey's (ACS) 5-year estimates, Idaho has a total of 723,594 housing units. Of these, an estimated 87% (630,008) are occupied, with 70% owner occupied and 30% renter occupied. The state's homeownership rate was high at 70% as of 2019, which is comparable to many peer states and higher than the national average.

Figure II-1. Homeownership Rates in Peer States, 2019

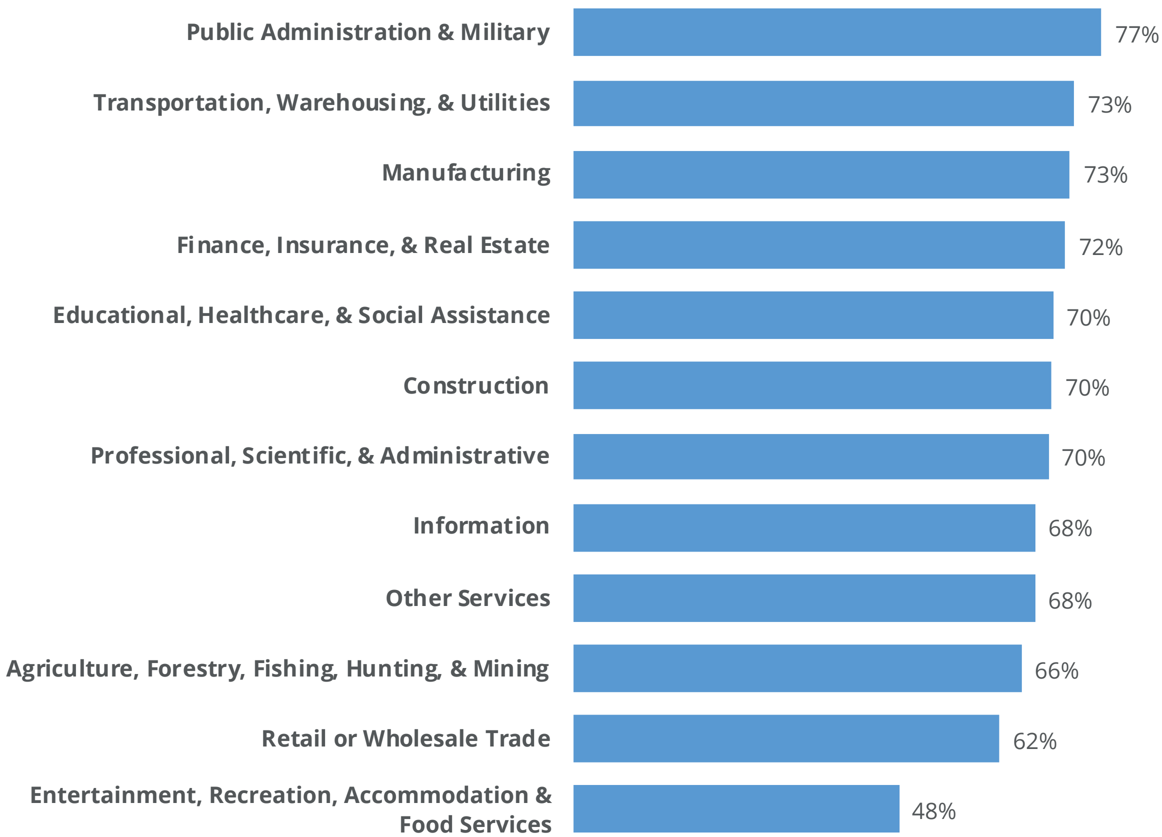
Source:
2019 5-year ACS estimates .



However, Idaho's high homeownership rate does not apply to those working in all types of industries across the state and varies regionally.

For instance, Idahoans working in public administration, the military, transportation, utilities, and manufacturing industries had the highest rates of homeownership, as indicated in Figure II-2. On the other end of the spectrum, just 48% of those working in entertainment, recreation, accommodation, or food service owned their homes.

Figure II-2.
Homeownership Rates by Industry, State of Idaho, 2019



Notes: Households are considered cost burdened if their gross rent or total monthly ownership costs are greater than 30% of their household income. Households' industry is determined by the industry of the household head. Unemployed household heads or those out of the labor force are excluded from the data. "Other Services" include automotive repair and maintenance, personal and household goods repair and maintenance, barber shops, beauty salons, laundry services, religious organizations, etc.

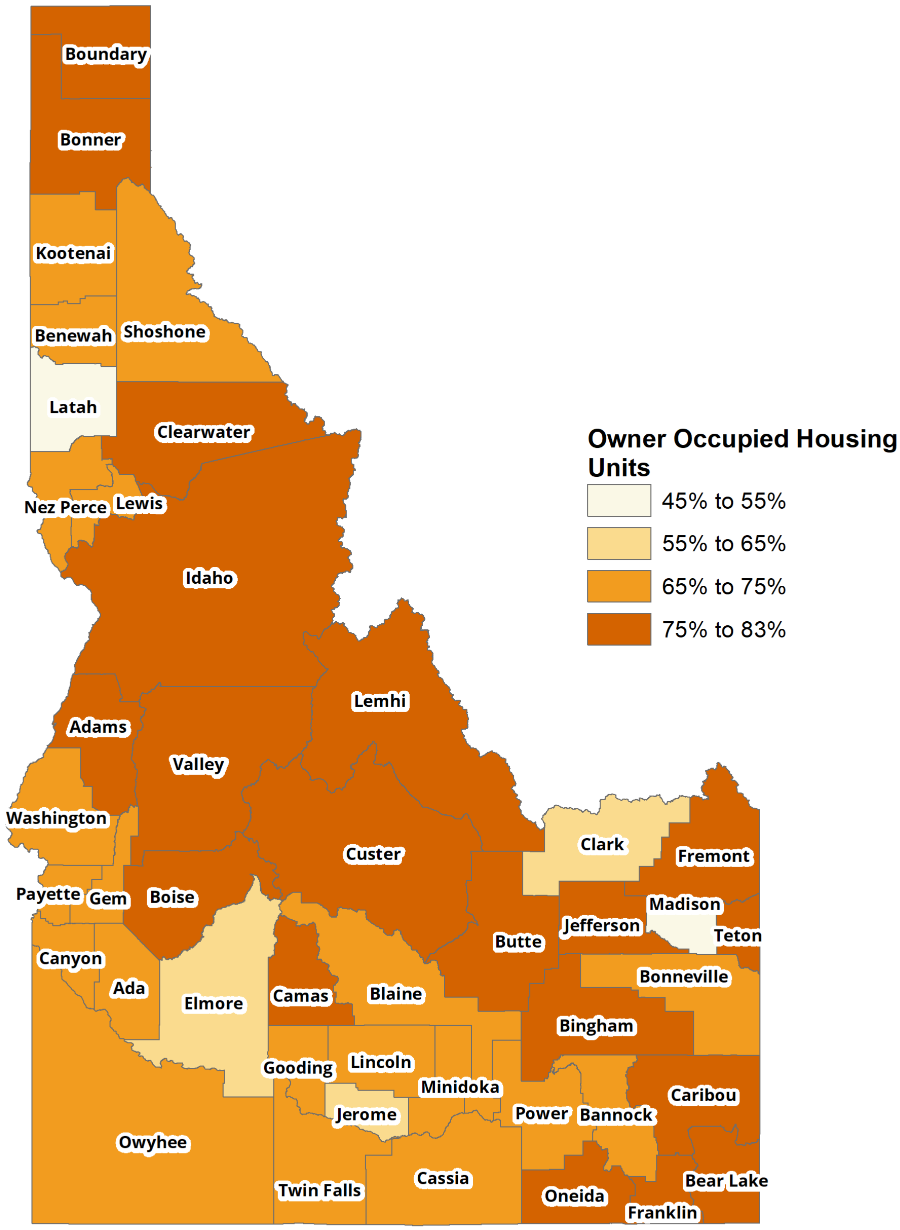
Source: 2019 5-year PUMS data and Root Policy Research.

Counties with the highest proportion of owner-occupied homes are Boise (83%), Butte (82%), Franklin (81%) and Fremont (81%) counties.

Counties with the highest proportion of renter-occupied homes are Madison County (55%), Latah County (46%), and Elmore County (40%).

Figure II-3. Percent of Owner-Occupied Housing Units, State of Idaho, 2019

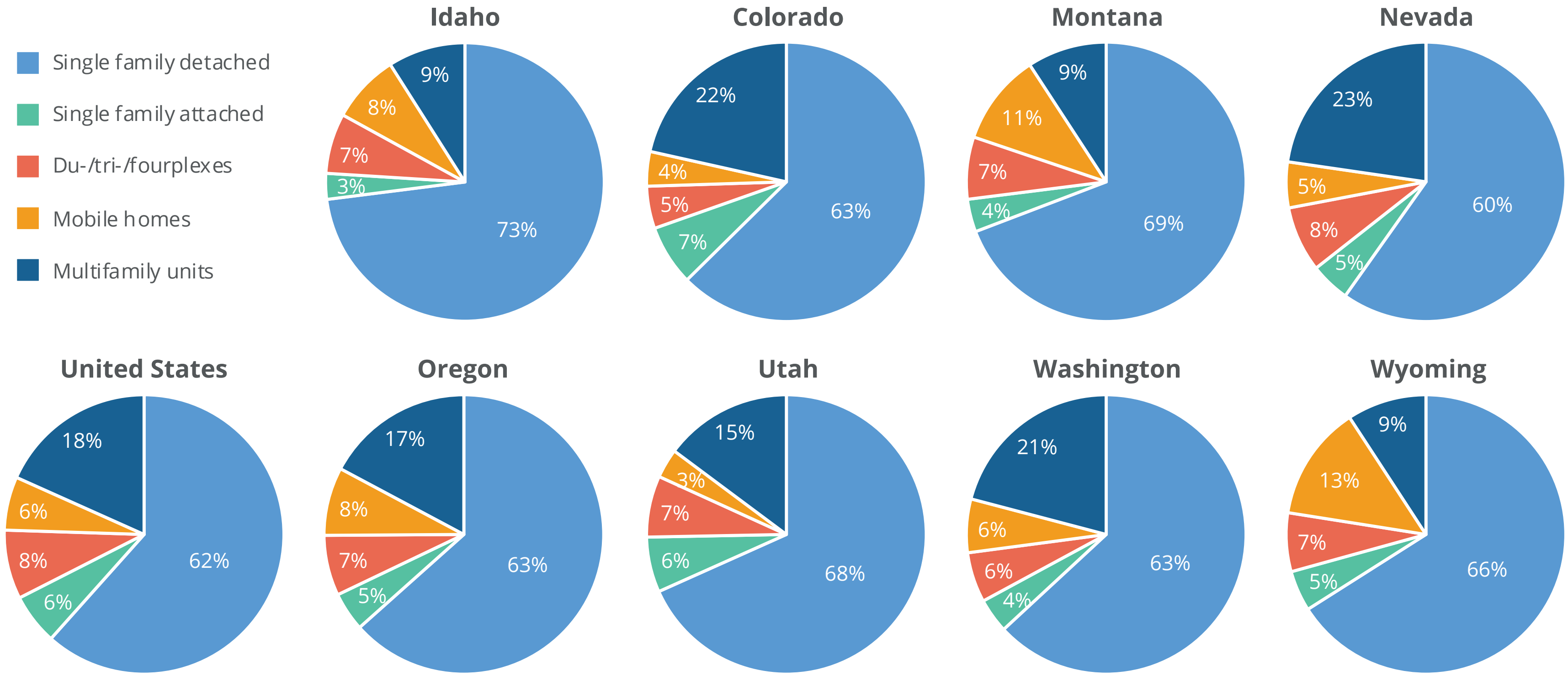
Source:
2019 5-year ACS estimates, and Root Policy Research.



The vast majority—about three-quarters (73%) of the state's housing units—are single-family detached homes. As such, most Idahoans are living in single-family detached homes which are typically more expensive to both buy and rent. As shown in Figure II-4, Idaho has much less diverse housing stock than peer and neighboring states.

The remainder of the state's housing stock is comprised of single-family attached homes (townhomes) (3%), du-/tri-/fourplexes (7%), mobile homes (8%) and multifamily units/apartments (9%). Counties with the lowest proportions if single family detached housing are those with high proportions of apartments/condos and mobile homes, like in in university areas including Madison County (36% single family detached) and Latah County (51.3% single family detached).

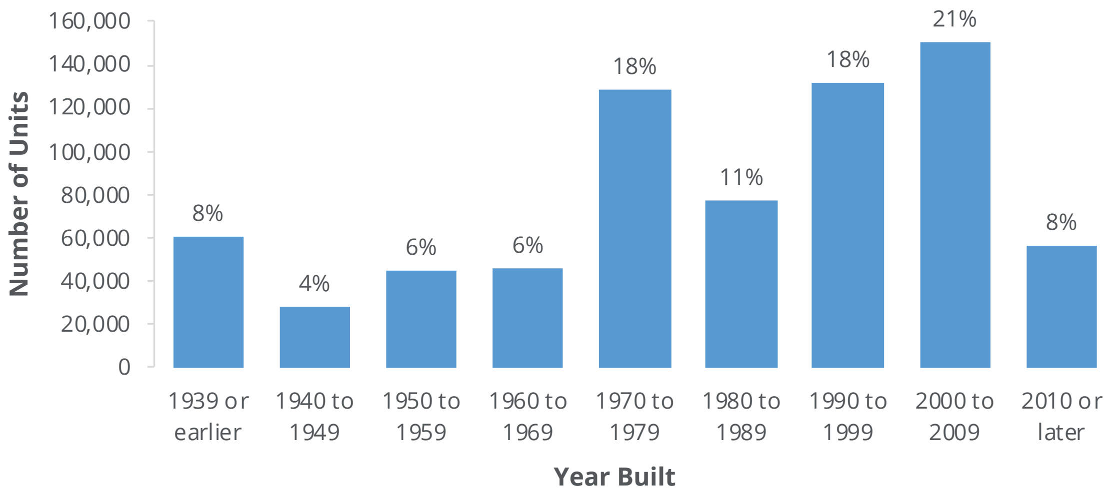
Figure II-4.
Housing Types, State of Idaho and Peer States, 2019



Source: 2019 5-year ACS estimates.

Many of Idaho's homes are relatively old: 43% were built before 1980. Although older homes are often popular for their unique design and charm, they can also be more expensive to heat/cool, have higher maintenance costs, and have a higher likelihood of lead exposure which can lead to adverse health effects.[1] They are also less likely to be accessible to residents with disabilities, which is discussed in subsequent sections. As Figure II-5 indicates, 150,036 (or 21%) Idaho homes were built between 2000 and 2009, and 30% were built between 1990 and 2009. Since 2009, development has been very modest, closer to the pace of development in the 1950s and 1960s.

Figure II-5.
Age Distribution of Housing Units, State of Idaho, 2019



Source: 2019 5-year ACS estimates..

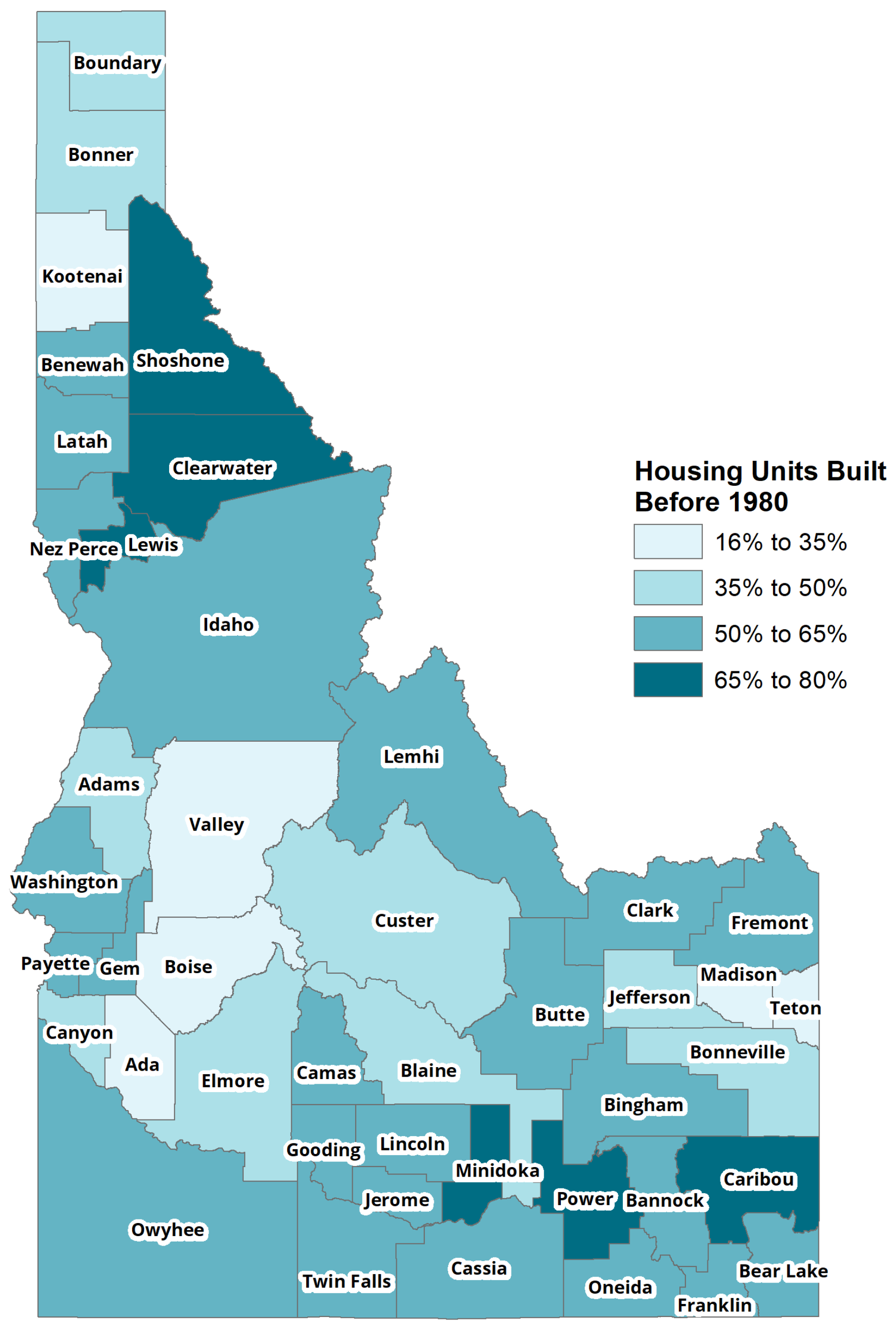
Compared to other counties in the state, Teton County has the largest proportion of new homes with 53% of the county's homes built after 2000. Similarly, 47% of Madison County's homes and 36% of Ada County's homes were built after 2000. Madison and Ada Counties have the largest proportions of new housing: 9% of Madison County's homes and 8% of Ada County's homes were built after 2014. Other counties have much older housing. For example, 53% of Shoshone County's homes were built before 1960 and just over 40% of homes Lewis and Oneida counties were built before 1960.

[1] Dignam, Timothy, et al. "Control of lead sources in the United States, 1970-2017: public health progress and current challenges to eliminating lead exposure." *Journal of public health management and practice: JPHMP* 25 (2019): S13.

Figure II-6. Percent of Housing Units Built before 1980 by County, 2019

Source:

2019 5-year ACS estimates.

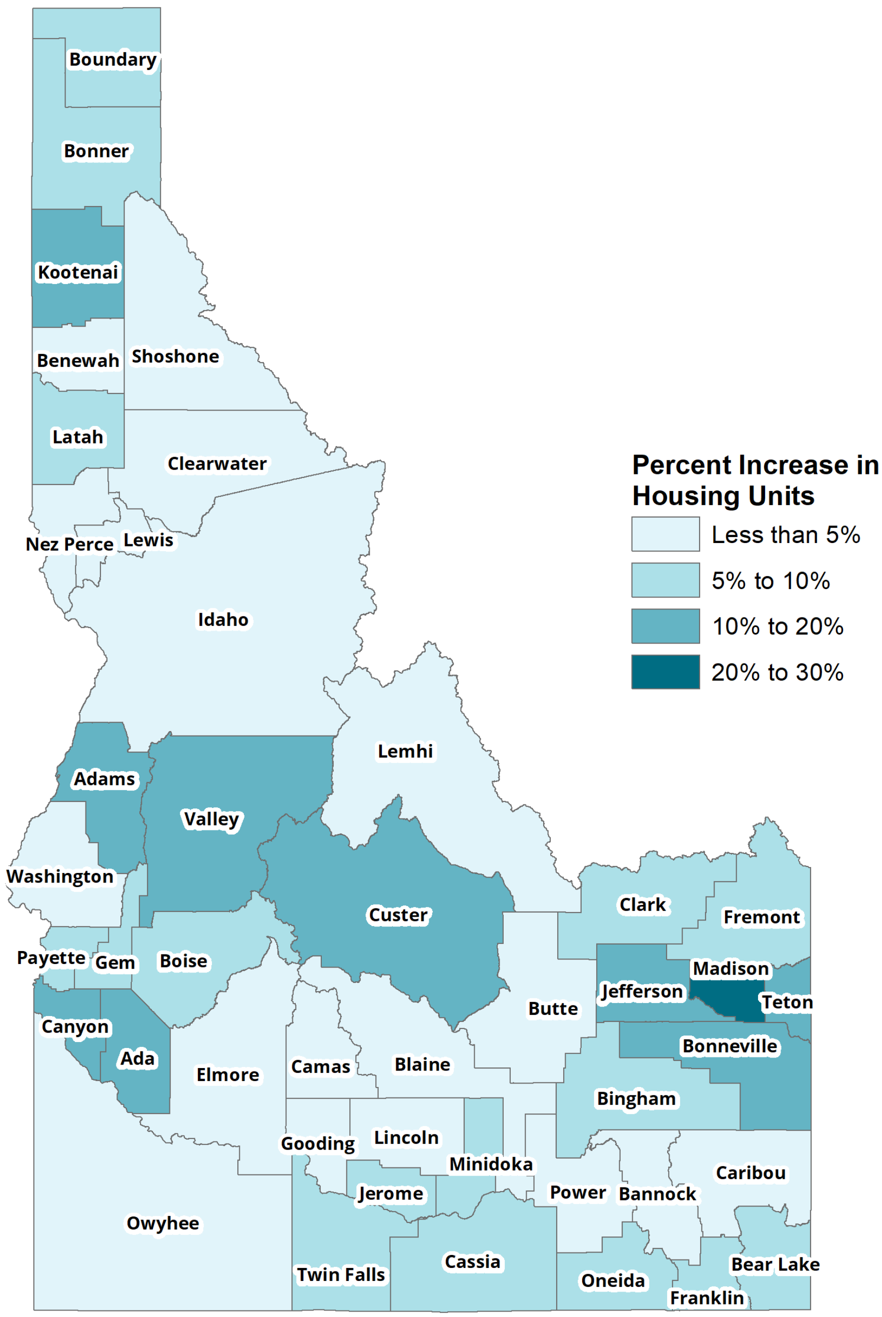


From 2010 to 2019, Idaho has increased its overall housing stock by 11%, or by 71,271 units. Canyon, Kootenai, and Ada Counties saw the largest number of new housing units between 2010 and 2019, with an increase of 25,779 units in Ada County, 9,719 units in Kootenai County, and 8,598 in Canyon County. In terms of percent change in total housing stock, Madison County saw a 29% increase in housing units, Teton and Ada counties saw a 17% increase in housing units, and Kootenai County saw a 16% increase in housing units between 2010 and 2019. Figure II-7 illustrates percent change of housing stock in all Idaho counties.

Figure II-7. Percent Change in Total Housing Units by County2010 to 2019

Source:

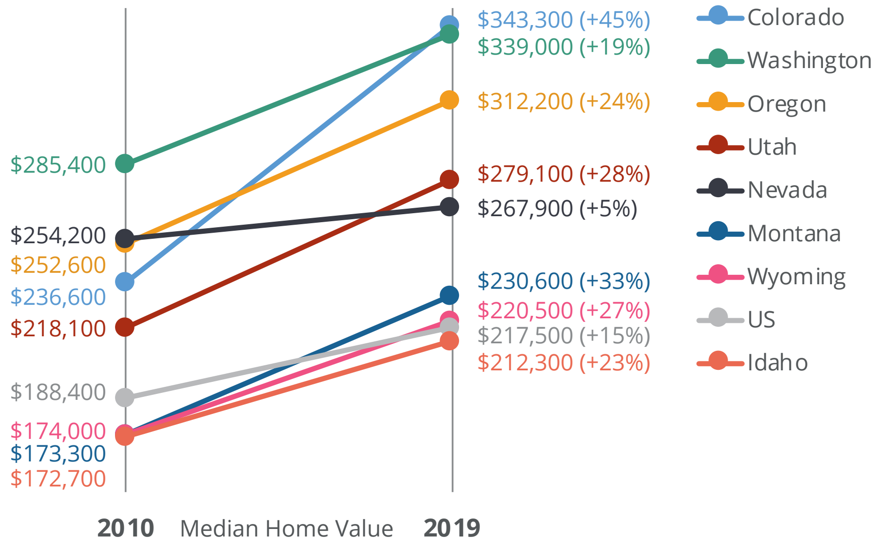
U.S. Census Bureau 2010 and 2019 5-year ACS estimates, and Root Policy Research.



Home value trends. According to housing price data from the Census, housing costs increased in most parts of in Idaho in the past decade. The median home value in Idaho rose 23% between 2010 and 2019—from $172,700 in 2010 to $212,300 in 2019. This growth rate is similar to peer states, but outpaced national home value growth.

Figure II-8. Change in Home Values, State of Idaho and Peer States, 2010 to 2019

Source: U.S. Census Bureau 2010 and 2019 5-year ACS estimates, and Root Policy Research.

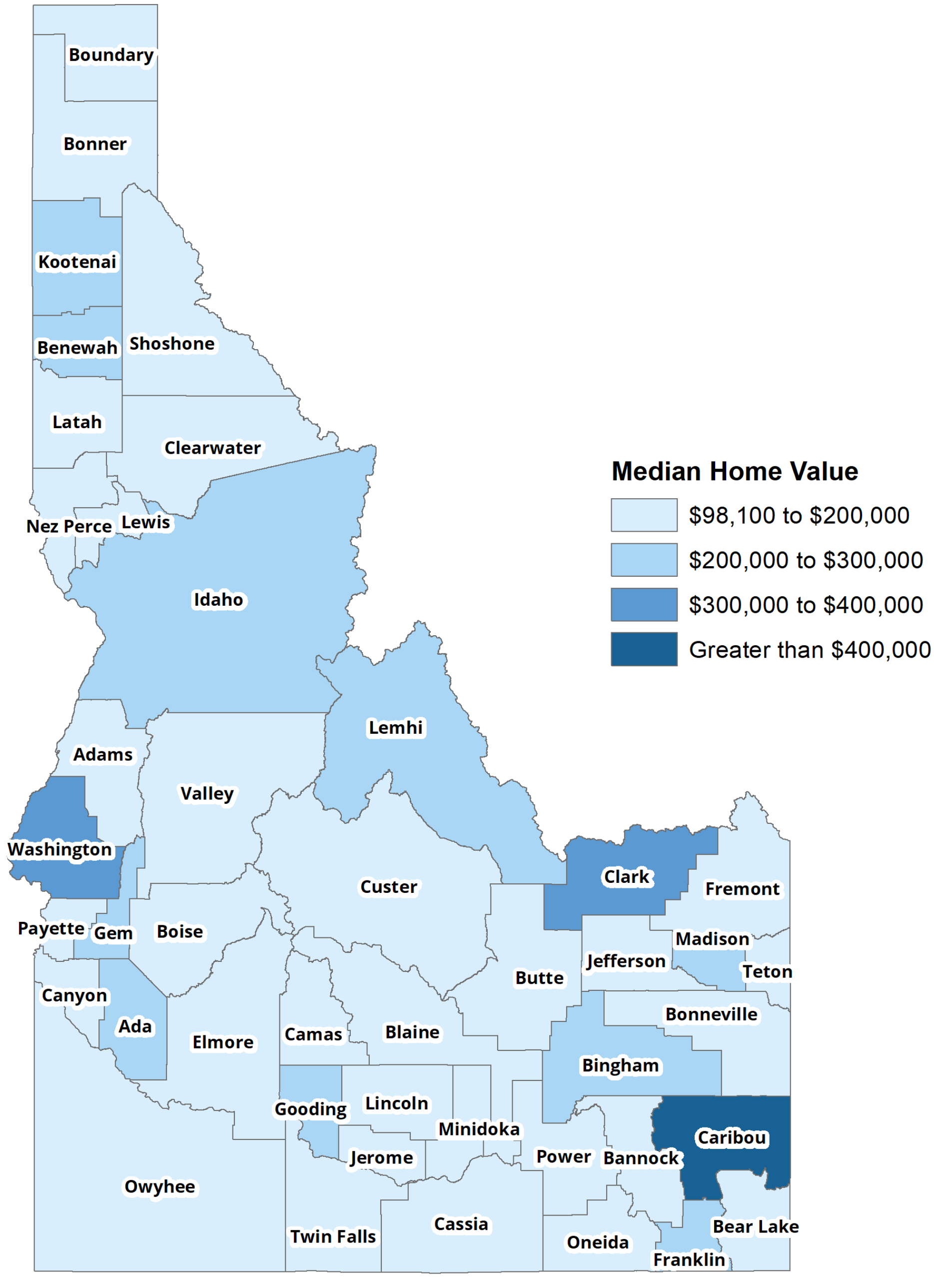


Counties with the lowest median home values were Clark County ($98,100), Shoshone County ($127,900), and Butte County ($128,900). Counties with the highest median home values were Blaine County ($428,900), Teton County ($346,600), and Valley County ($314,800).

Figure II-9. Median Home Values by County, 2019

Source:

2019 5-year ACS estimates.

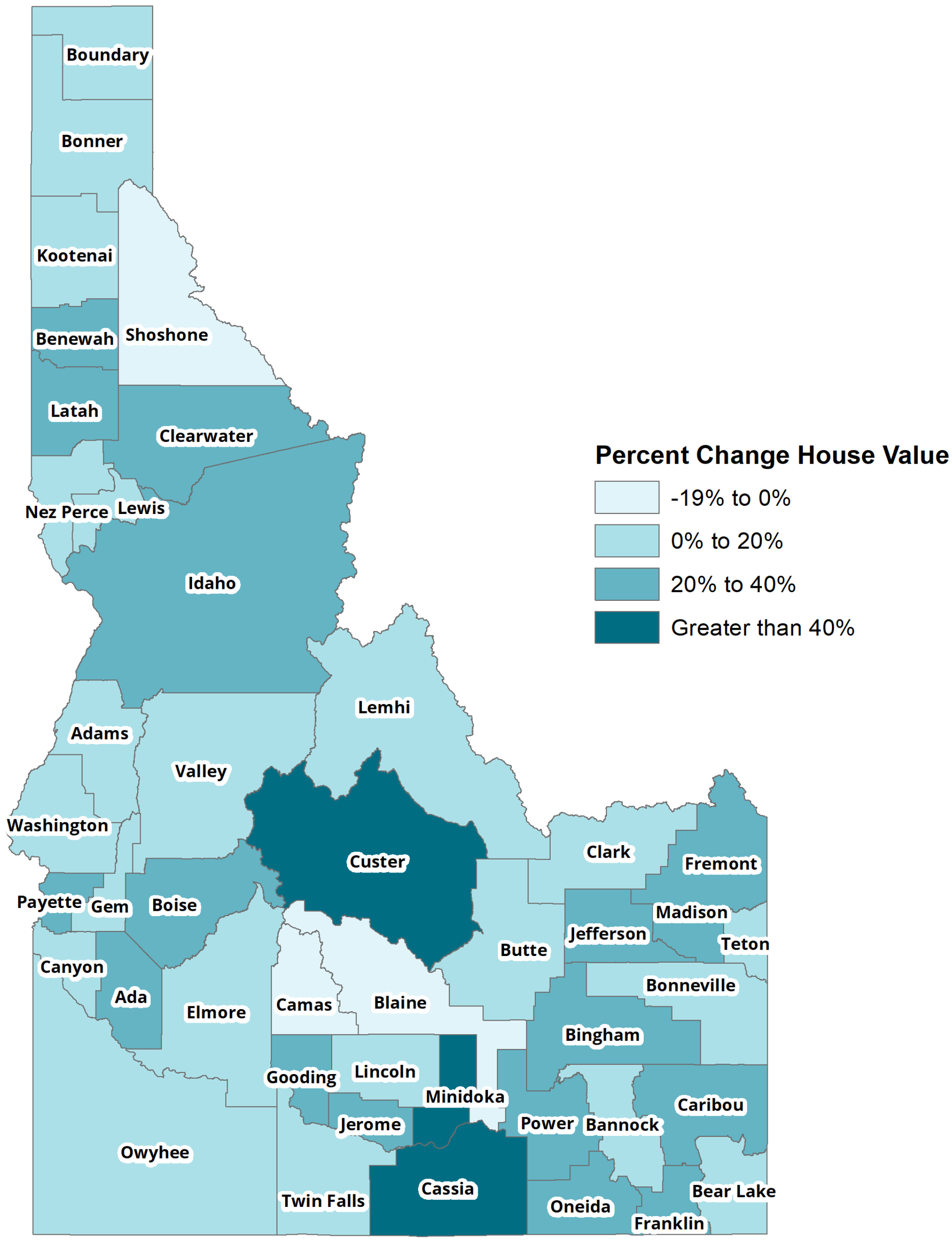


Minidoka and Custer counties experienced the largest growth in home values between 2010 and 2019: both saw over 50% increases in median housing values since 2010. Camas, Shoshone, and Blaine counties each experienced a decrease in median home values since 2010: a 19% decrease in Camas County, a 12% decrease in Shoshone County, and a 9% decrease in Blaine County. These data are illustrated by county in Figure II-10.

Figure II-10. Home Value Growth by County, 2010 to 2019

Source:

U.S. Census Bureau 2010 and 2019 5-year ACS estimates, and Root Policy Research.

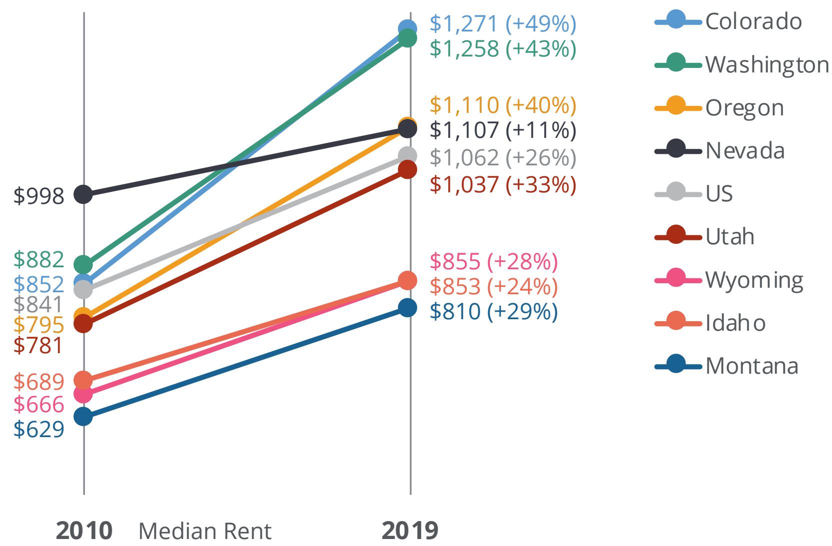


Rental cost trends. Rental price increases in the state overall were slightly higher than home value growth, rising 24% between 2010 and 2019. The median gross rent (which includes utilities) increased from $689 in 2010 to $853 in 2019.

Figure II-11. Change in Gross Rent, State of Idaho and Peer States, 2010 to 2019

Source:

U.S. Census Bureau 2010 and 2019 5-year ACS estimates, and Root Policy Research.



Counties with the highest median rents were Ada County ($995), Kootenai County ($993), and Blaine County ($933) while counties with the lowest rents were Caribou County ($570) and Bear Lake County ($589). Butte and Oneida counties experienced the largest proportional increases in rent: both increased by over 40% between 2010 and 2019. No counties saw a decrease in median rents over the decade, but rent growth was slowest in Blaine and Bear Lake counties.

Figure II-12. Median Gross Rent by County, 2019

Source:

2019 5-year ACS estimates.

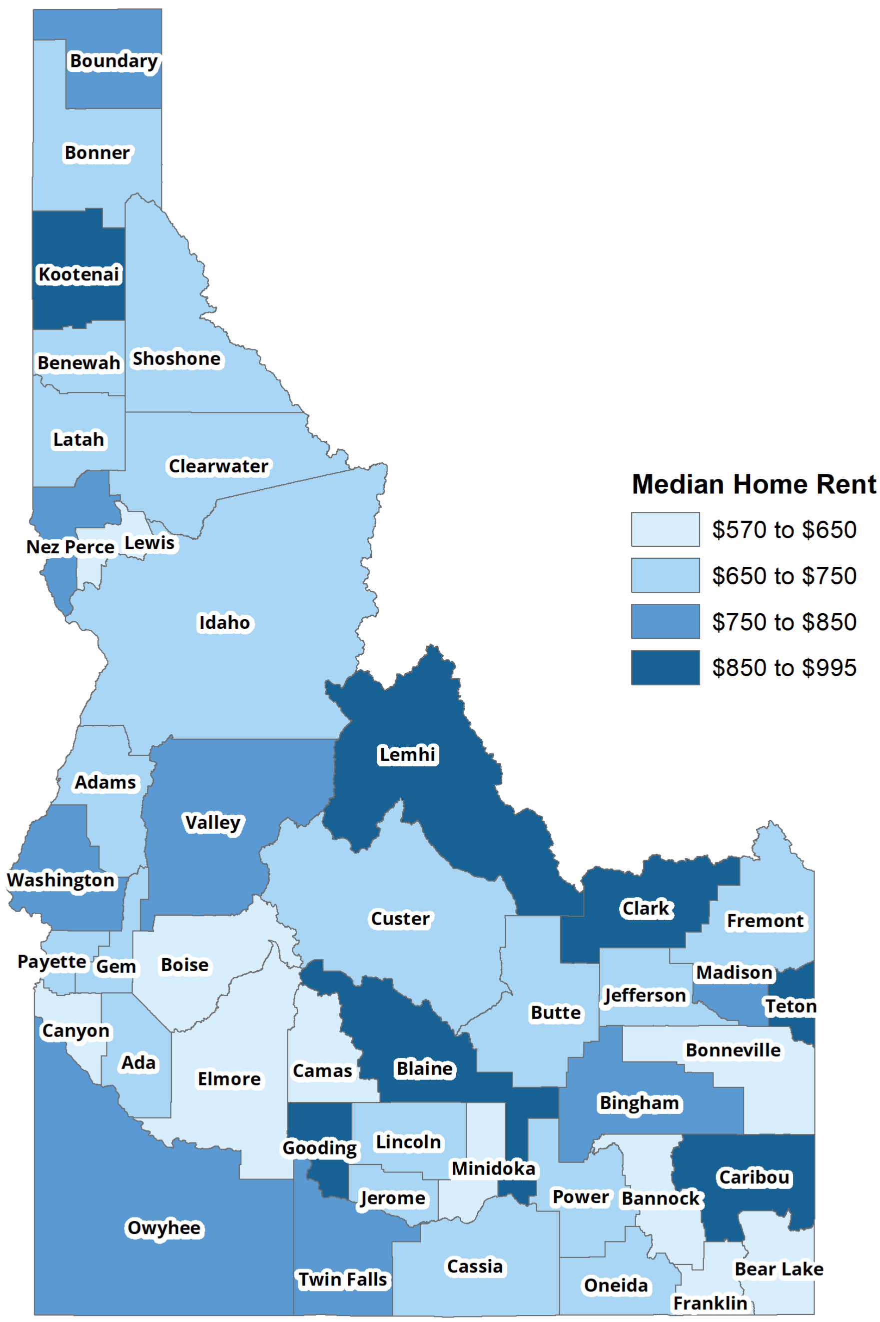
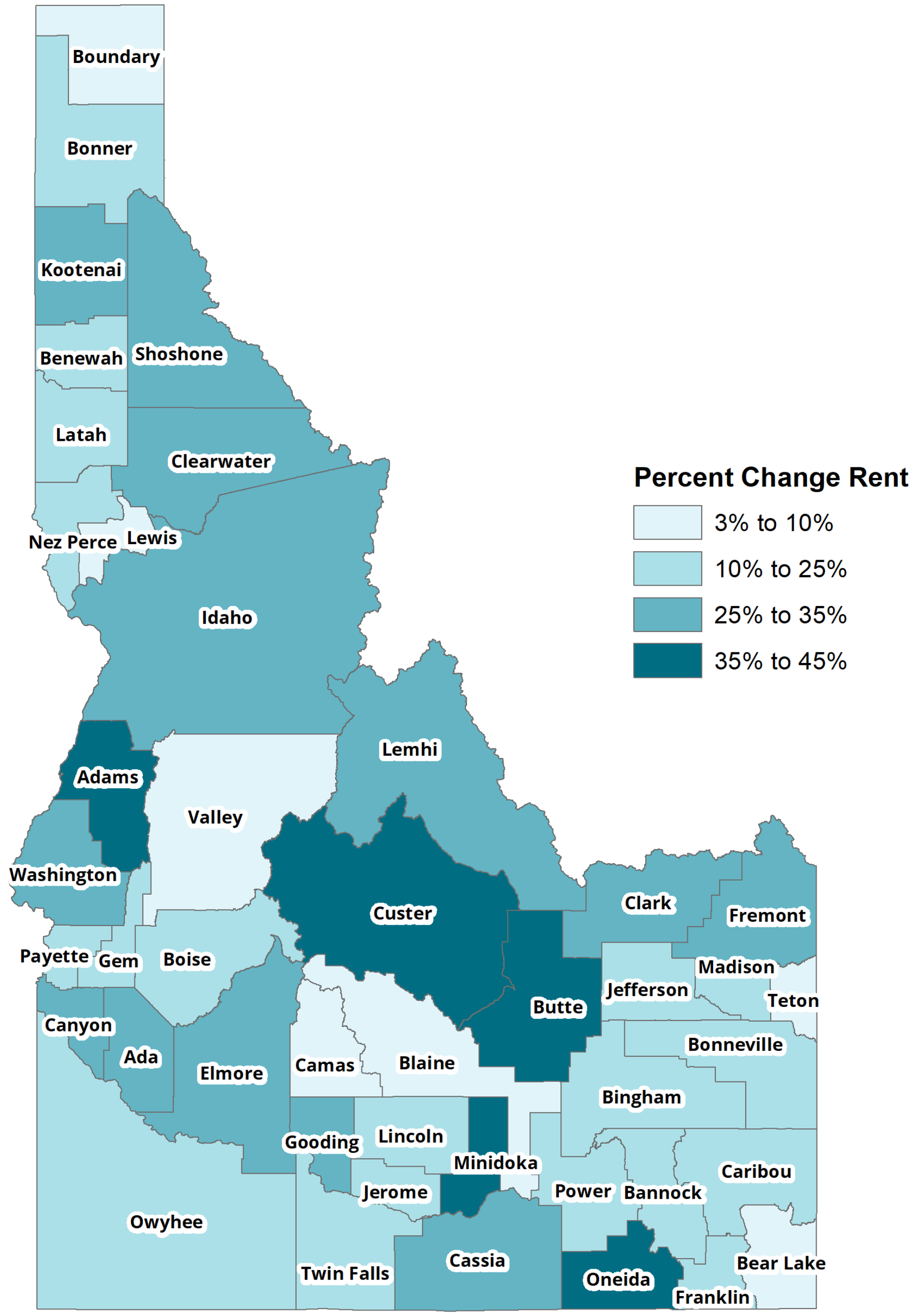


Figure II-13. Median Rent Growth by County, 2010 to 2019

Source:

U.S. Census Bureau 2010 and 2019 5-year ACS estimates, and Root Policy Research.



Further details are provided in Figure II-14 below.

Figure II-14. Housing Values and Rent Costs by County, 2010 and 2019

Category	Median Home Values			Median Monthly Rent		
	2019	2010	Percent Change	2019	2010	Percent Change
Metro						
Ada County	$270,800	$214,500	26%	$995	$780	28%
Bannock County	$160,000	$135,500	18%	$691	$576	20%
Boise County	$232,300	$186,700	24%	$754	$663	14%
Bonneville County	$181,200	$153,400	18%	$819	$674	22%
Butte County	$128,900	$108,500	19%	$656	$452	45%
Canyon County	$178,300	$151,300	18%	$896	$710	26%
Franklin County	$211,900	$165,300	28%	$680	$549	24%
Gem County	$168,700	$161,700	4%	$745	$666	12%
Kootenai County	$260,300	$220,000	18%	$993	$768	29%
Nez Perce County	$191,500	$159,600	20%	$727	$585	24%
Owyhee County	$147,800	$133,500	11%	$668	$540	24%
Nonmetro micropolitar						
Bingham County	$160,100	$125,300	28%	$662	$541	22%
Blaine County	$428,900	$473,600	-9%	$933	$902	3%
Bonner County	$254,200	$236,300	8%	$853	$716	19%
Camas County	$183,300	$226,100	-19%	$853	$788	8%
Cassia County	$162,100	$114,600	41%	$647	$515	26%
Elmore County	$153,800	$142,600	8%	$833	$658	27%
Fremont County	$169,900	$125,200	36%	$798	$616	30%
Jerome County	$164,600	$135,200	22%	$772	$660	17%
Latah County	$228,200	$183,800	24%	$737	$634	16%
Lincoln County	$145,600	$124,600	17%	$639	$572	12%
Madison County	$219,100	$169,700	29%	$723	$595	22%
Minidoka County	$149,600	$ 98,400	52%	$701	$506	39%
Payette County	$165,600	$134,800	23%	$735	$605	21%
Teton County	$346,600	$294,800	18%	$881	$820	7%
Twin Falls County	$166,800	$148,400	12%	$800	$650	23%
Nonmetro noncore						
Adams County	$215,500	$205,100	5%	$685	$504	36%
Bear Lake County	$149,800	$135,900	10%	$589	$557	6%
Benewah County	$167,000	$123,000	36%	$644	$558	15%
Boundary County	$205,000	$174,600	17%	$613	$575	7%
Caribou County	$145,900	$116,000	26%	$570	$509	12%
Clark County	$ 98,100	$ 82,800	18%	$592	$468	26%
Clearwater County	$155,900	$124,800	25%	$719	$536	34%
Custer County	$191,600	$127,600	50%	$608	$445	37%
Gooding County	$157,800	$127,500	24%	$704	$553	27%
Idaho County	$173,200	$140,900	23%	$682	$510	34%
Jefferson County	$203,700	$154,000	32%	$796	$639	25%
Lemhi County	$177,000	$174,900	1%	$657	$496	32%
Lewis County	$132,300	$112,100	18%	$593	$541	10%
Oneida County	$167,100	$120,400	39%	$748	$525	42%
Power County	$151,300	$121,900	24%	$636	$558	14%
Shoshone County	$127,900	$145,000	-12%	$670	$524	28%
Valley County	$314,800	$287,100	10%	$773	$727	6%
Washington County	$148,900	$140,200	6%	$683	$520	31%
Idaho	**$212,300**	**$172,700**	**23%**	**$853**	**$689**	**24%**

Source: U.S. Census Bureau 2010 and 2019 5-year ACS estimates, and Root Policy Research.

Housing prices v. incomes. Overall, incomes have increased in similar proportions to housing costs over the last decade. Idaho's overall median household income was $55,785 in 2019. Among Idahoan renters, median household income was just $35,175—an increase of 23% from 2010. Idaho homeowners' median household income was much higher at $67,135, an increase of 21% from 2010. Compared with a 23% increase in median home values, and a 24% increase in rent, this means that income growth of Idaho residents fell just a few percentage points short of keeping pace with their housing costs. However, these data do not include 2020 housing costs, which many stakeholders expressed increased drastically from 2019. The data also mask the displacement of low income owners and renters that occurred as housing prices increased.

Figure II-15. Growth in Median Income v. Median Home Values and Rent by County, 2010 to 2019

	Renters			Owners		
	Change in Rents	Change in Income	Difference	Change in Home Values	Change in Income	Difference
Metro						
Ada	28%	23%	4%	26%	20%	7%
Bannock	20%	23%	-3%	18%	19%	-1%
Boise	14%	-2%	16%	24%	21%	4%
Bonneville	22%	34%	-12%	18%	23%	-4%
Butte	45%	85%	-40%	19%	12%	7%
Canyon	26%	30%	-4%	18%	20%	-2%
Franklin	24%	19%	4%	28%	35%	-7%
Gem	12%	-4%	16%	4%	15%	-10%
Kootenai	29%	33%	-4%	18%	20%	-2%
Nez Perce	24%	28%	-4%	20%	27%	-7%
Owyhee	24%	10%	14%	11%	41%	-31%
Nonmetro micropolitan						
Bingham County	22%	24%	-1%	28%	22%	6%
Blaine County	3%	-12%	15%	-9%	-4%	-6%
Bonner County	19%	10%	9%	8%	21%	-14%
Camas County	8%	-1%	9%	-19%	-8%	-11%
Cassia County	26%	50%	-24%	41%	26%	16%
Elmore County	27%	11%	15%	8%	7%	1%
Fremont County	30%	-5%	34%	36%	35%	1%
Jerome County	17%	21%	-4%	22%	32%	-10%
Latah County	16%	43%	-27%	24%	30%	-6%
Lincoln County	12%	14%	-2%	17%	4%	13%
Madison County	22%	-4%	26%	29%	25%	4%
Minidoka County	39%	28%	10%	52%	24%	28%
Payette County	21%	60%	-39%	23%	14%	8%
Teton County	7%	-25%	33%	18%	36%	-18%
Twin Falls County	23%	13%	10%	12%	25%	-13%
Nonmetro noncore						
Adams County	36%	34%	1%	5%	31%	-26%
Bear Lake County	6%	-9%	15%	10%	40%	-30%
Benewah County	15%	2%	14%	36%	26%	10%
Boundary County	7%	46%	-39%	17%	32%	-14%
Caribou County	12%	15%	-3%	26%	28%	-2%
Clark County	26%	62%	-35%	18%	-1%	19%
Clearwater County	34%	8%	27%	25%	12%	13%
Custer County	37%	-3%	39%	50%	-12%	62%
Gooding County	27%	14%	13%	24%	34%	-10%
Idaho County	34%	77%	-43%	23%	13%	10%
Jefferson County	25%	60%	-36%	32%	27%	5%
Lemhi County	32%	52%	-19%	1%	-2%	3%
Lewis County	10%	20%	-10%	18%	26%	-8%
Oneida County	42%	107%	-64%	39%	21%	17%
Power County	14%	26%	-12%	24%	20%	4%
Shoshone County	28%	14%	14%	-12%	12%	-24%
Valley County	6%	-43%	50%	10%	46%	-36%
Washington County	31%	39%	-7%	6%	2%	4%

Source: U.S. Census Bureau 2010 and 2019 5-year ACS estimates and Root Policy Research.

Incomes did not keep up with housing costs in all parts of the state. Counties which saw the largest disparities in owners' income growth and housing value growth were Custer County and Minidoka County. In Minidoka County, homeowners' median income grew by only 24% while housing values grew by 52%. Similarly, in Custer County home values grew by 50%, but incomes for homeowners shrunk by 12%.

Renters in Custer County, along with Valley and Fremont Counties, also saw large disparities in growth rates between their income and median rent. In Custer County, renters' median incomes shrunk by 3% while their rents increased by 37%. In Valley County, renters' median incomes shrunk by a massive 43% while their rents increased by 6%. Lastly, in Fremont County, renters' incomes shrunk by 5% and their rent increased by 30%.

Employer assisted workforce housing. With rising housing prices, many low income workers are facing challenges finding affordable housing. In an effort to maintain their workforces, several employers across the state are offering employee housing. This is especially common in resort towns—and is increasing elsewhere in Idaho.

For example, in Twin Falls, Sun Valley Resort recently offered employee housing for around $10 per day.[2] Much of the housing is dormitories housing two to four unrelated employees as well as couple-specific housing. Other resorts offer similar opportunities for their employers, including Hill's Resort in Priest Lake, Sawtelle Mountain Resort in Island Park, as well as Brundage Mountain Ski Resort, Shore Lodge Whitetail, and The Whitetail Club in McCall. Tamarack Resort, also in McCall, recently worked to add dormitories, family apartments, and a 'van life' area for its employees.[3]

Resorts are not the only employers offering housing for their workers. The mining company Perpetua Resources has a Stibnite Gold Project proposal in Valley County, in which they aim to build a new Stibnite Lodge to house 500 of their employees, including miners, construction workers, and office staff.[4] Hospitals have also recently worked to provide employee housing in Idaho. St. Luke's Wood River in Ketchum broke ground in September 2021 to build four houses in Hailey for employees. In total, there will be 12 employee housing units built in the next year; eight in Hailey and four in Bellevue. The hospital, the St. Luke's Wood River Foundation and ARCH, a community housing trust, are working together on the project. ARCH owns the land and will manages the properties, and St. Luke's will determine the employee eligibility. The hospital owns a handful of rentals

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[2] Rabe, Layne. "Sun Valley Resort is now hiring for summer." KMVT (May 2021). https://www.kmvt.com/2021/05/03/sun-valley-resort-is-now-hiring-for-summer/

[3] Robertson, Autumn. "With acute housing crunch, Tamarack looks to add hundreds of employee housing beds." BoiseDev. (August 2021). https://boisedev.com/news/2021/08/30/tamarack-resort-looks-to-add-over-500-employee-housing-beds/

[4] https://perpetuaresources.com/news/what-are-your-plans-for-housing-employees/

nearby, but those have historically been used to house short-term staff, or specialists practicing out of the hospital temporarily.[5]

Second Homes and In-Migration

The growing popularity of second and vacation homes—and Idaho's popularity as a destination state—has put upward pressure on the housing market. This section examines these trends through home vacancy rates and correlations between in-migration to Idaho and housing costs.

Vacant homes. According to ACS data, the overall vacancy rate for Idaho was 13% in 2019, which was a very slight increase from 12.6% in 2010. However, some counties in Idaho have been experiencing large increases in home vacancy over the last decade.

- Valley County had the highest vacancy rate at 69%, which was up from 61% in 2010.

Followed by,

- Fremont County at 52%, up from 46% in 2010,
- Camas County at 51%, up from 44% in 2010,
- Clark County at 48%, up from 36% in 2010,
- Blaine at 48%, up from 38% in 2010,
- Custer at 46%, up from 35% in 2010,
- Boise at 42%, the same as in 2010,
- Bear Lake at 41%, up from 34% in 2010, and
- Teton at 36%, up from24% in 2010.

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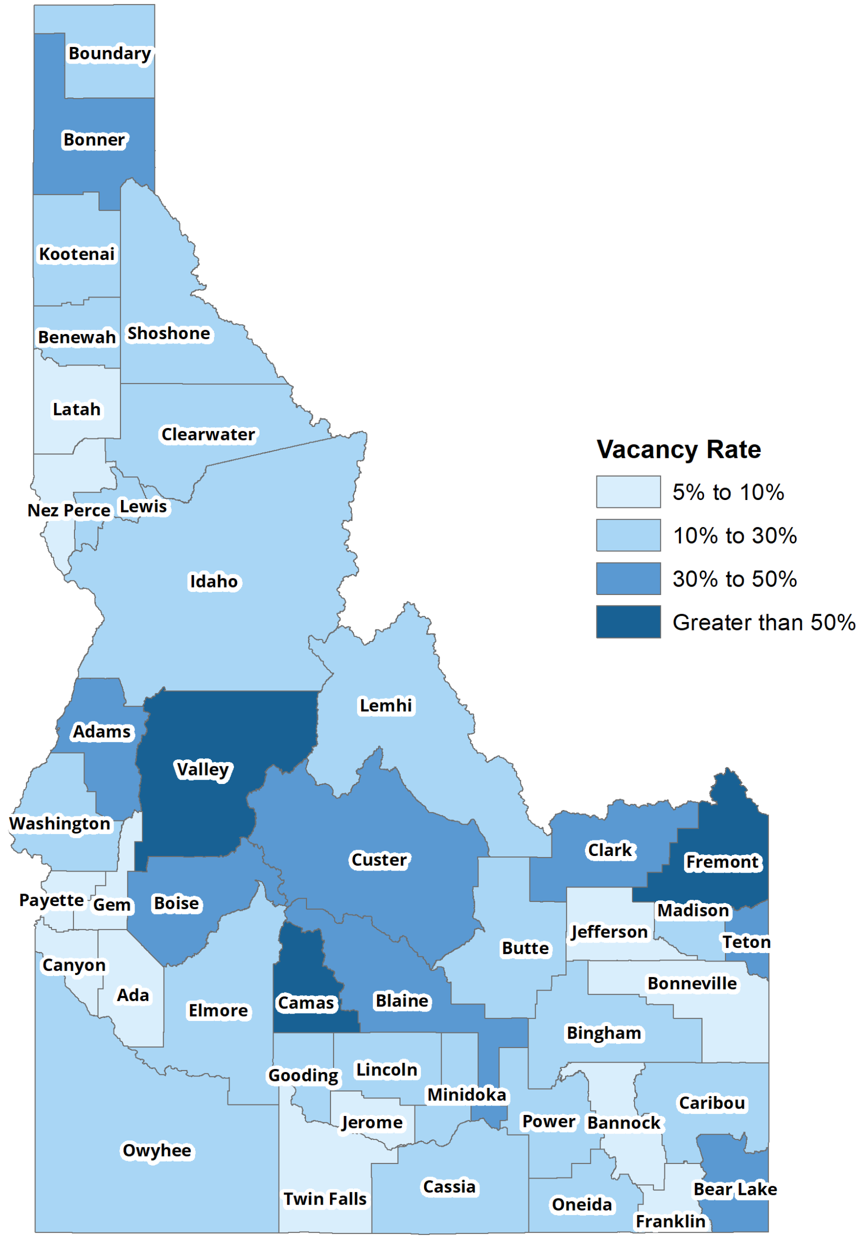
[5] Cohen, Rachel. "Why a hospital in an Idaho resort town is building employee housing." Boise State Public Radio (October 2021). https://www.boisestatepublicradio.org/news/2021-09-30/why-a-hospital-in-an-idaho-resort-town-is-building-employee-housing

Figure II-16. Housing Vacancy Rates by County, 2019

Source:

2019 5-year ACS estimates, and Root Policy Research.



Reasons for home vacancy vary. Homes can be vacant because they are for sale, on the rental market, held for migrant workers, or used seasonally or recreationally. Madison County had a particularly high vacancy rate for homes on the rental market at 18%, compared to the statewide average of just 1%. Similarly, Benewah County shows 4% of homes vacant and for sale, compared to just 1% of homes statewide. Butte, Clark, and Lemhi counties also had slightly higher rates of vacancy for home sales.

Overall, vacancies for units that are meant for permanent residents—that are for rent or for sale—and considerably lower than counties' overall housing vacancy rates. This suggests that vacant units are being reserved for some other purpose—namely seasonal and recreational use.

Figure II-17. Vacancies for Rent and for Sale by County, 2019

	Total Vacant Units	Vacancy Rate	Vacant Units for Rent		Vacant Units for Sale	
			Number of Units	Percent of Housing Stock	Number of Units	Percent of Housing Stock
Metro						
Ada County	8,180	5%	1,321	1%	1,351	1%
Bannock County	3,124	9%	851	2%	321	1%
Boise County	2,349	42%	27	0%	128	2%
Bonneville County	3,157	7%	693	2%	509	1%
Butte County	321	25%	92	7%	38	3%
Canyon County	3,440	5%	691	1%	529	1%
Franklin County	440	9%	-		71	1%
Gem County	666	9%	49	1%	-	
Jefferson County	578	6%	69	1%	24	0%
Kootenai County	8,588	12%	493	1%	602	1%
Nez Perce County	1,445	8%	322	2%	254	1%
Owyhee County	593	12%	16	0%	26	1%
Nonmetro micropolitan						
Bingham County	1,756	10%	215	1%	309	2%
Blaine County	7,447	48%	248	2%	338	2%
Bonner County	7,584	30%	251	1%	400	2%
Camas County	409	51%	10	1%	-	
Cassia County	1,036	12%	232	3%	81	1%
Elmore County	1,883	15%	159	1%	69	1%
Fremont County	4,636	52%	153	2%	61	1%
Jerome County	509	6%	40	0%	107	1%
Latah County	1,538	9%	236	1%	159	1%
Lincoln County	277	14%	50	2%	19	1%
Madison County	3,211	23%	2,552	18%	83	1%
Minidoka County	951	12%	103	1%	56	1%
Payette County	578	6%	118	1%	36	0%
Teton County	2,126	36%	161	3%	99	2%
Twin Falls County	2,136	6%	375	1%	246	1%
Nonmetro noncore						
Adams County	933	35%	6	0%	32	1%
Bear Lake County	1,694	41%	16	0%	55	1%
Benewah County	1,315	28%	19	0%	184	4%
Boundary County	821	15%	33	1%	72	1%
Caribou County	753	23%	73	2%	32	1%
Clark County	272	48%	-		16	3%
Clearwater County	1,070	23%	66	1%	55	1%
Custer County	1,503	46%	78	2%	62	2%
Gooding County	762	12%	37	1%	30	0%
Idaho County	2,365	27%	107	1%	211	2%
Lemhi County	1,295	27%	104	2%	158	3%
Lewis County	302	16%	12	1%	14	1%
Oneida County	384	19%	10	1%	8	0%
Power County	384	13%	-		72	2%
Shoshone County	1,663	23%	92	1%	120	2%
Valley County	8,504	69%	85	1%	95	1%
Washington Count	608	13%	5	0%	47	1%
State of Idaho	**93,586**	**13%**	**10,270**	**1%**	**7,179**	**1%**

Source: Source: 2019 5-year ACS estimates, and Root Policy Research.

Vacation homes. Many vacant homes are second homes, used seasonally and recreationally. Figure II-18 illustrates counties which had high proportions of their housing units attributed to seasonal or recreational use. The overall rate of total homes used seasonally or recreationally for Idaho was 7% in 2019. This is a one percentage-point increase from 2010, which represents 13,299 housing units now being used seasonally. Had just half of these conversions to second homes occurred, 6,650 of those homes could have been made available for primary residency. This is equivalent to X percent of all new housing units developed between 2010 and 2019.

Some counties had very high rates: for example, 66% of all housing units in Valley County were vacant for seasonal, recreational, or occasional use. This is an 11 percentage-point increase from 2010, when the rate of recreational housing in Valley County was 55%. In fact, 1,945 additional housing units in the county are now used for recreational use compared to 2010. This is equivalent to X percent of the total housing stock.

Several other counties experienced large increases in the share of homes used for recreation. Counties which experienced the largest percentage point increases in their recreational home rate were:

- Teton County, increasing to 31% in 2019 from 12% in 2010,
- Camas County 42% from 27%, and
- Blaine County, 41% from 30%.

Figure II-18. Seasonal/ Recreational Housing Rates by County, 2019

Source: 2019 5-year ACS estimates, and Root Policy Research.

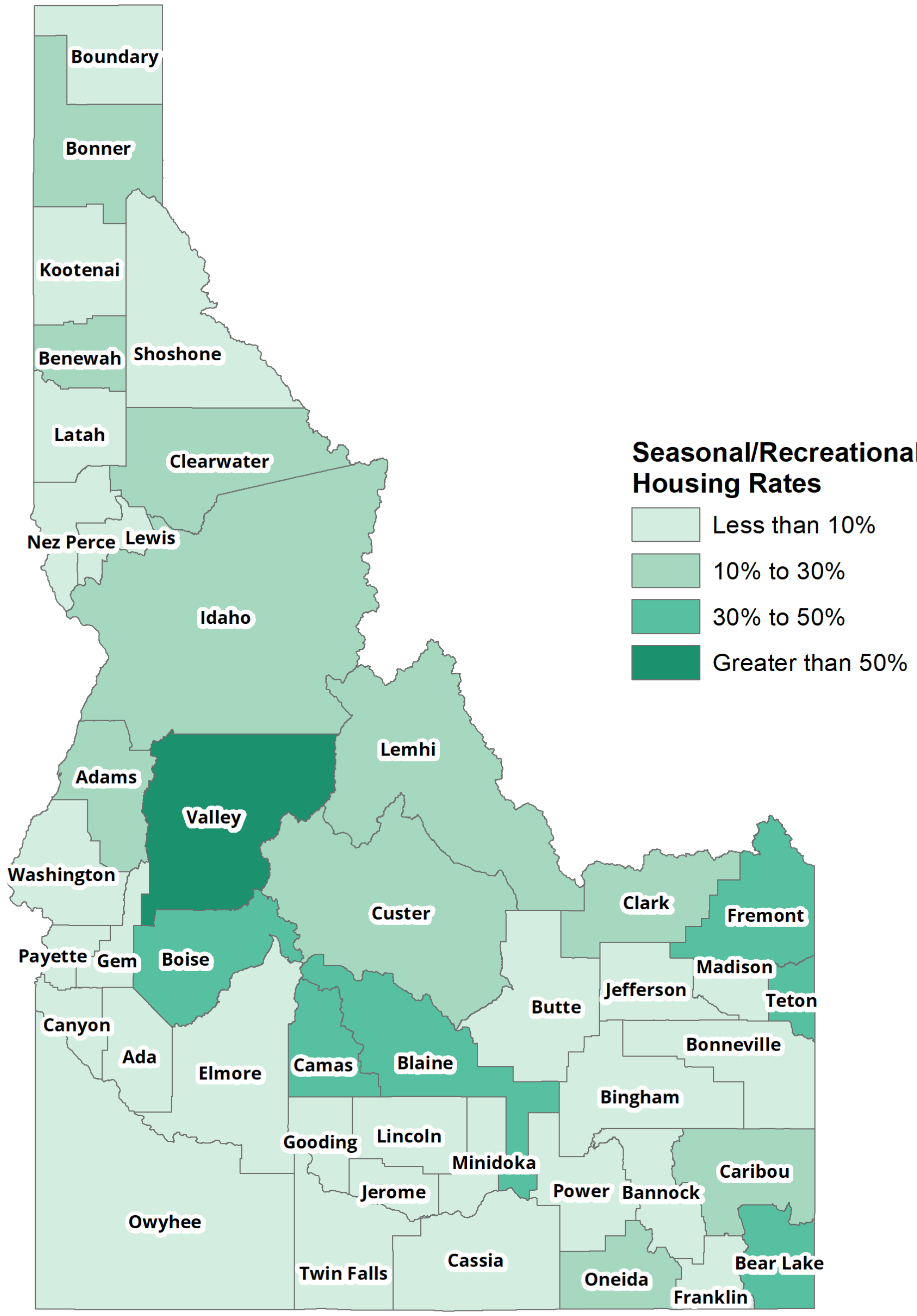


Figure II-19. Change in Seasonal/Recreational Housing Rates, 2019

	Units Vacant for Recreational Use	Recreational Housing Rate	Increase in Recreation Units, 2010 to 2019	Percentage Point Change in Recreational Housing Rate, 2010 to 2019
Metro				
Ada County	1,579	1%	714	0%
Bannock County	753	2%	239	1%
Boise County	1,992	36%	100	-1%
Bonneville County	705	2%	100	0%
Butte County	25	2%	4	0%
Canyon County	231	0%	-333	-1%
Franklin County	135	3%	23	0%
Gem County	151	2%	83	1%
Jefferson County	42	0%	-47	-1%
Kootenai County	6,037	9%	1,888	2%
Nez Perce County	325	2%	-22	0%
Owyhee County	266	5%	-5	0%
Nonmetro micropolitan				
Bingham County	307	2%	239	1%
Blaine County	6,406	41%	1,879	11%
Bonner County	5,724	23%	1,613	5%
Camas County	336	42%	128	15%
Cassia County	281	3%	144	2%
Elmore County	924	7%	118	1%
Fremont County	4,200	47%	930	7%
Jerome County	200	2%	93	1%
Latah County	250	1%	88	0%
Lincoln County	32	2%	-73	-3%
Madison County	101	1%	-56	-1%
Minidoka County	88	1%	-121	-2%
Payette County	179	2%	24	0%
Teton County	1,792	31%	1,188	19%
Twin Falls County	544	2%	237	1%
Nonmetro noncore				
Adams County	800	30%	195	4%
Bear Lake County	1,398	34%	503	10%
Benewah County	721	15%	434	9%
Boundary County	422	8%	275	5%
Caribou County	409	12%	203	6%
Clark County	163	29%	43	6%
Clearwater County	477	10%	67	1%
Custer County	930	28%	264	6%
Gooding County	351	6%	258	4%
Idaho County	1,055	12%	33	0%
Lemhi County	601	12%	48	0%
Lewis County	64	3%	18	1%
Oneida County	210	11%	71	3%
Power County	35	1%	-77	-3%
Shoshone County	236	3%	-229	-3%
Valley County	8,191	66%	1,945	11%
Washington County	164	4%	73	1%
State of Idaho	49,832	7%	13299	1%

Source: 2019 5-year ACS estimates and Root Policy Research.

A great deal of individuals purchasing homes in Idaho in 2020 were purchasing second homes. Home Mortgage Disclosure Act (HMDA) data indicate which home mortgages were for second homes. Note that HMDA data only include home purchases which made use of a mortgage: home purchases made in cash, without a mortgage, are not included in the data. Therefore, the following estimates are an undercount of how many homes were purchased as second homes in 2020.

In 2020, 8% of home loans in the entire state were for second homes, an increase of 2 percentage points from the 6% of loans in 2019 and 2018. Valley County had the largest percent of mortgages attributed to second homes in 2020: 57% home loans taken out in Valley County were for second homes.

The HMDA data indicate that the following counties has the highest proportion of home loans that were for second homes in 2020:

- Valley County at 57%—up from 44% in 2019 and 49% in 2018
- Bear Lake County, 37%—up from 27% in 2019 and 26% in 2018
- Adams County, 35%—up from 24% in 2019 and 30% in 2018
- Fremont County, 35%—about the same as the 35% in 2019, but up from 31% in 2018
- Blaine County, 32%—up from 25% in 2019 and 23% in 2018
- Teton, 28%—up from 23% in 2019 and 21% in 2018
- Boise, 24%—up from 21% in 2019 and 19% in 2018
- Bonner, 22%—up from 20% in 2019 and 24% in 2018
- Custer—26%, way up from 12% in 2019 and 16% in 2018

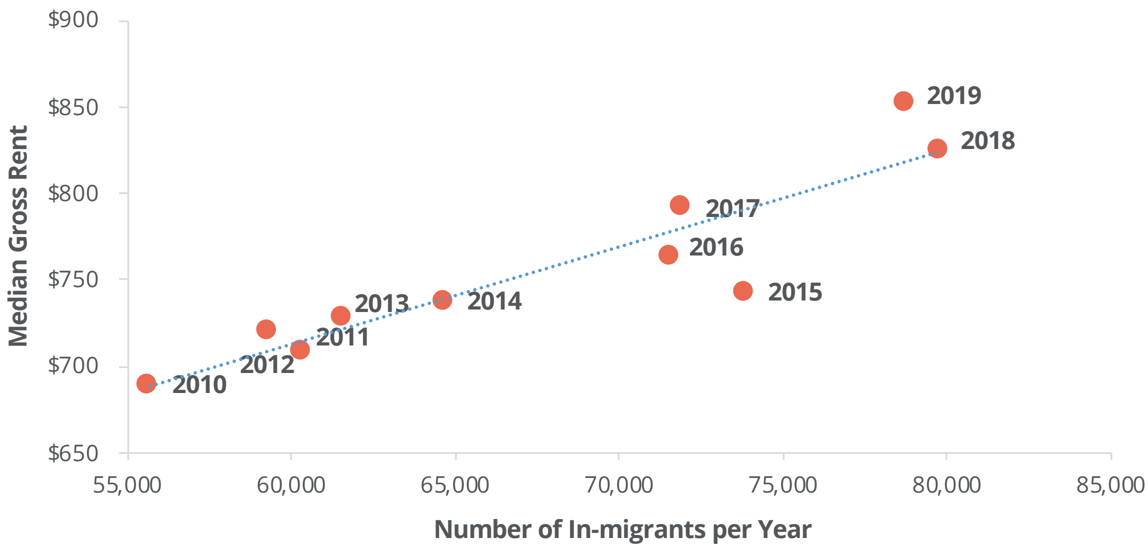
In-migration and housing costs. Though HMDA data do not show the state in which individuals permanently reside, many of these second-home purchases are likely from households previously residing outside of Idaho. In this section, we examine how in-migration is related to housing costs in the state.

Figure II-20 plots the relationship between median gross rent and the number of in-migrants from other U.S. states annually from 2010 to 2019. This relationship has a statistically significant correlation coefficient of 0.92, meaning that as in-migration increases, so do rent costs.[6] However, it is important to note that these are merely

[6] Statistically significant at the 0.01% level according to Pearson's correlation test.

correlations and do not provide causal evidence. In other words, these data do not show that in-migration causes rent increase, simply that the two are associated.

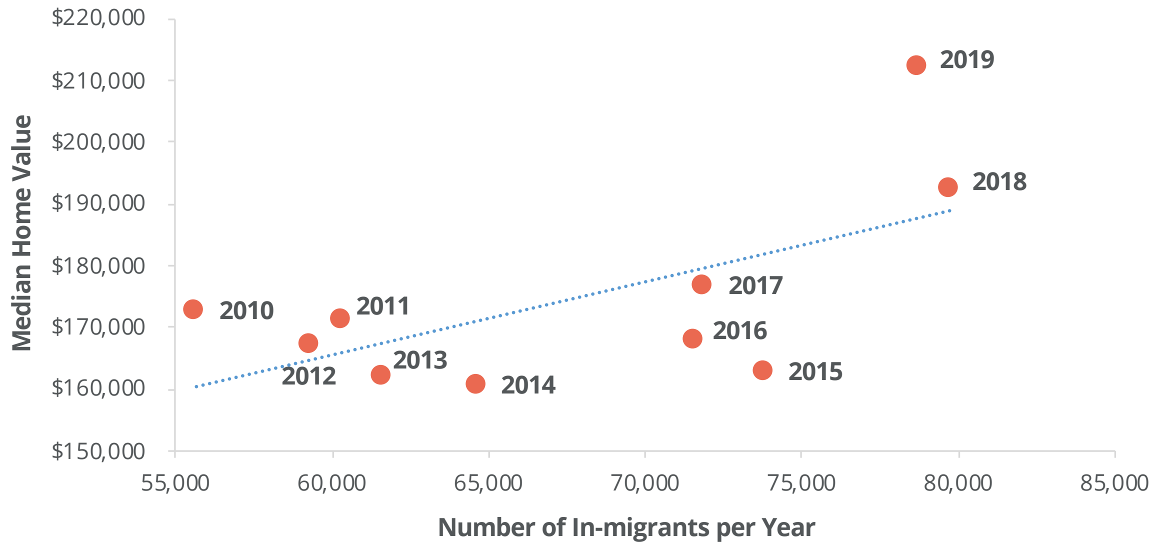
Figure II-20.
Relationship between Seasonal/Recreational Housing and In-Migration, State of Idaho, 2010 to 2019



Source: 2019 5-year ACS estimates, and Root Policy Research.

The relationship between in-migration and home values, on the other hand, is not as clear. As illustrated in Figure II-21 below, there is a positive relationship between the two, with a correlation coefficient of 0.62, but it is statistically insignificant at the 5% level. This statistical insignificance can be visualized by the wider spread of points around the trendline compared to the previous figure. In other words, there are too many outliers in the data to determine a statistically significant correlation between number of in-migrations per year and annual median home values.

Figure II-21.
Relationship between Home Values and In-Migration, State of Idaho, 2010 to 2019



Source: 2019 5-year ACS estimates, and Root Policy Research.

Affordability Challenges

This section examines challenges faced by both renters and homeowners in affording housing. It examines rates of cost burden, overcrowding, and affordability gaps across the state and by county. It also illustrates differences in access to credit and use of high-priced loans by county.

Cost burden. Households vary considerably in their ability to manage rising housing costs and cost increases can be particularly difficult for households with stagnant incomes, job losses, and other large expenses such as child care and health care. One way to examine how well households can manage rising costs is through trends in cost burden.

Cost burden exists when households pay more than 30% of their gross household income in housing costs. Housing costs include the rent or mortgage payment, utilities, renter or homeowner insurance, and property taxes. When households are severely cost burdened—paying 50% and more of their incomes in housing costs—they may have trouble keeping up with medications/health care, affording food, and may be at risk of eviction, foreclosure, and homelessness.

Households paying more than 30% for housing are "cost burdened"

Households paying more than 50% for housing are "severely cost burdened"

Statewide, according to 2019 ACS data, 46% of renters are cost burdened. About 26% of homeowners with a mortgage are cost burdened and 9% of homeowners without a mortgage are cost burdened. Nearly one in five (19%) of renters are severely cost burdened. Just 6% of homeowners with a mortgage and 4% of homeowners without a mortgage are severely cost burdened.

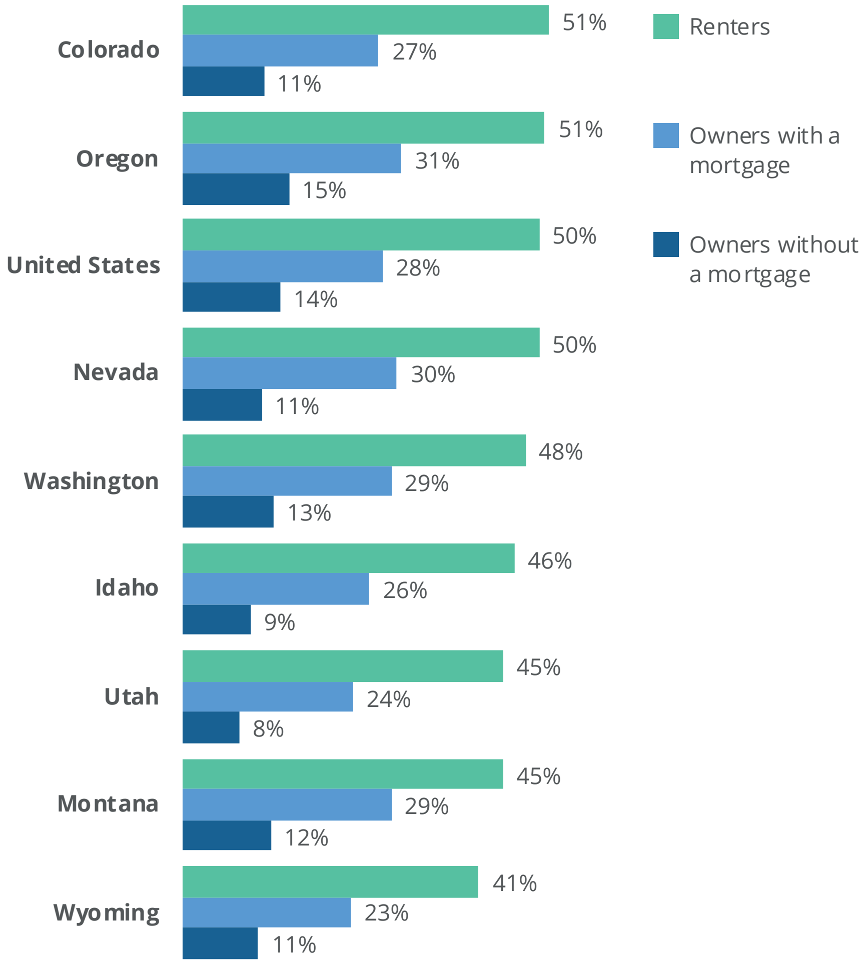
Renters in Idaho are less likely to be experiencing cost burden than those in the United States overall. Rates of renter cost burden are also lower in Idaho than in many peer states, including Colorado, Oregon, Nevada, and Washington.

Similarly, Idahoan owners with a mortgage are less likely to be cost burdened than their peers in Oregon, Nevada, Washington, Montana, and Colorado.

Figure II-22. Cost Burden by Tenure, State of Idaho and Peer States, 2019

Source:

2019 5-year ACS estimates, and Root Policy Research.

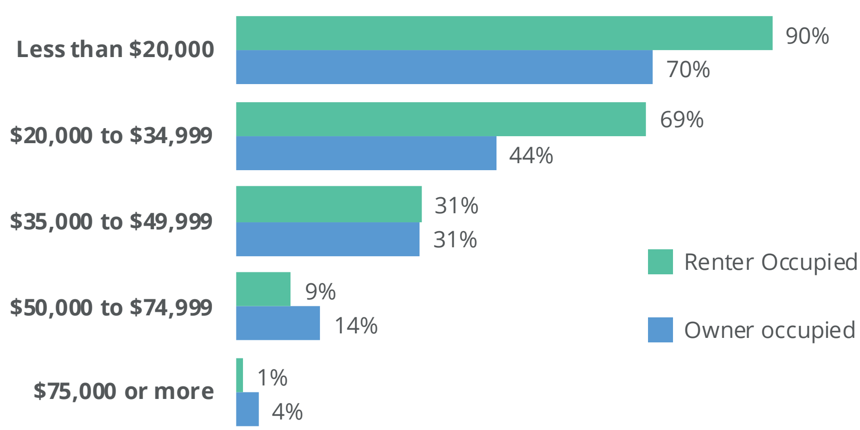


Idahoans with low incomes are more likely to be cost burdened than those with higher incomes. In fact, 90% of renters and 70% of homeowners with household incomes less than $20,000 are cost burdened. Only 1% of renters and 4% of owners with household incomes over $75,000 are cost burdened.

Figure II-23. Cost Burden by Income, State of Idaho, 2019

Source:

2019 5-year ACS estimates, and Root Policy Research.

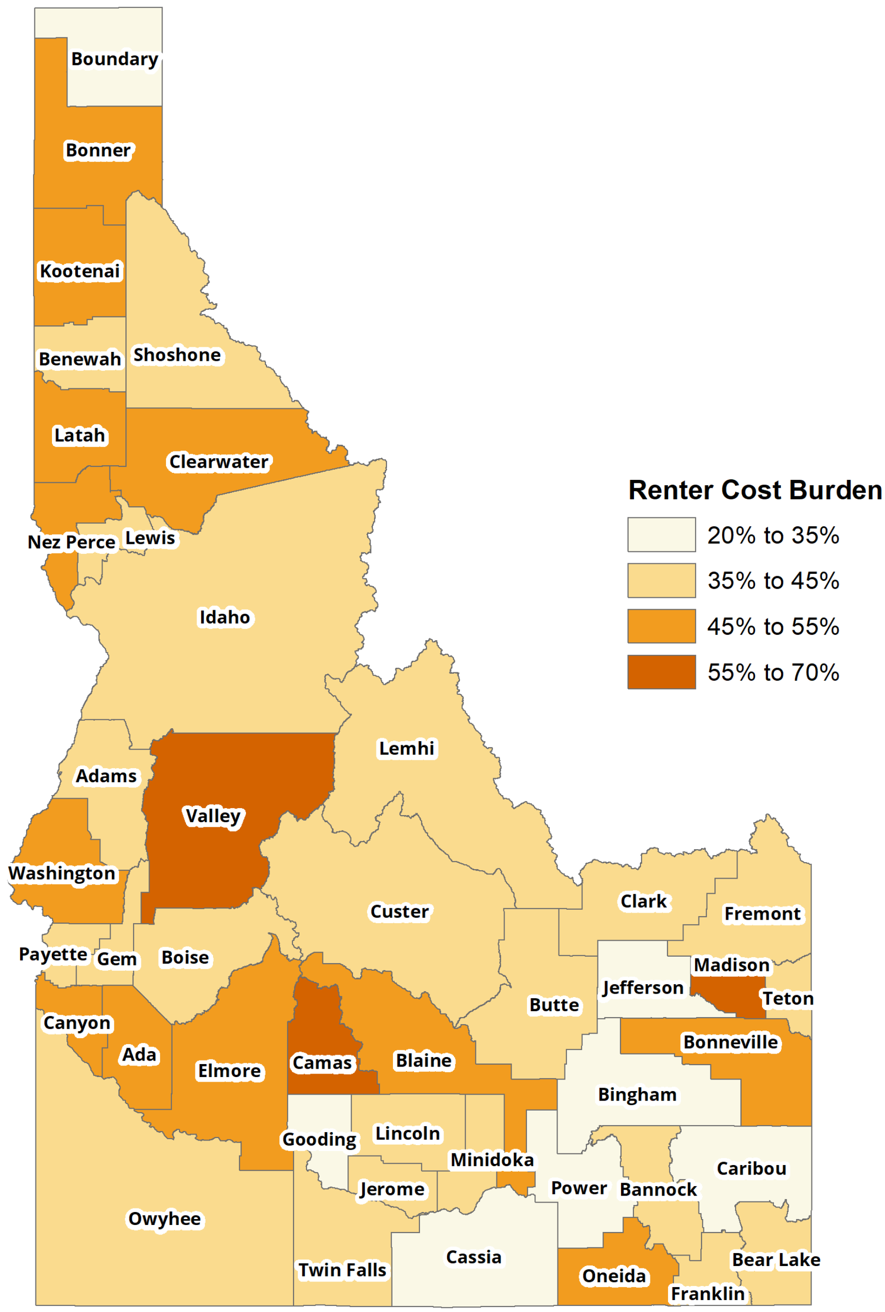


Figures II-24 shows the proportion of owners and renters who are cost burdened by county. Valley and Madison Counties have the highest proportion of cost-burdened renters: 70% of Madison County and Valley County renters are cost burdened. Similarly, 69% of renters in Camas County are cost burdened. Power County had the lowest percentages of cost burdened renters: 20% of renters were paying more than 30% of their incomes in housing costs. This relates to previously presented data on increases in housing costs and income. For instance, Valley County had an increase in rent costs (6%) from 2010 to 2019, but experienced a massive 43% decrease in median incomes.

Figure II-24. Cost Burdened Renters by County, 2019

Source:

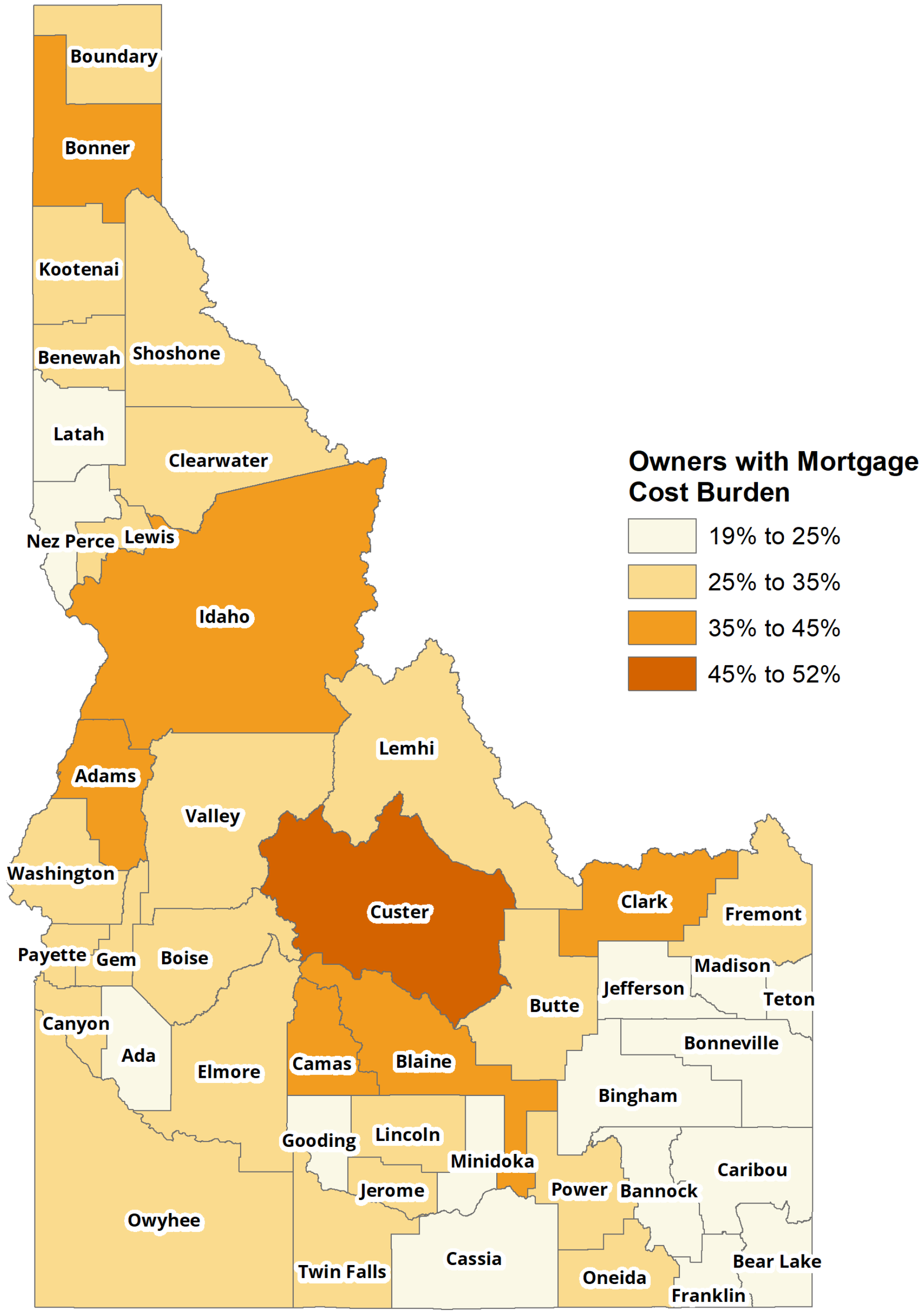
2019 5-year ACS estimates, and Root Policy Research.



Among homeowners, those with a mortgage in Custer and Idaho counties had the highest rates of cost burden and those in Caribou and Minidoka had the lowest.

Figure II-25. Cost Burdened Homeowners with a Mortgage by County, 2019

Source: 2019 5-year ACS estimates, and Root Policy Research.

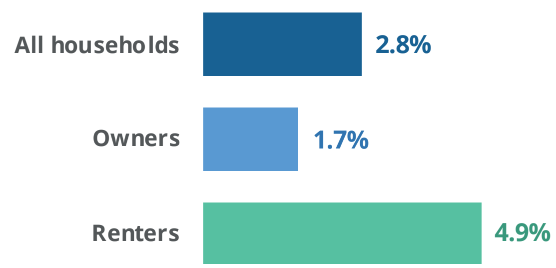


Overcrowding. To make ends meet, households often double up or choose to live in smaller spaces. An overcrowded household is defined as a housing unit with more than one person per room. Housing with multiple occupants per room can have a negative impact on mental health and can make it easier for diseases to spread.[7]

Homeowners are less likely to live in overcrowded conditions than renters. Just 1.7% of homeowners in Idaho live in a home with more than one occupant per room. Renters are much more likely to live in overcrowded housing, with 4.9% of renters in this situation statewide.

Figure II-26.
Overcrowded Households by Tenure, State of Idaho, 2019

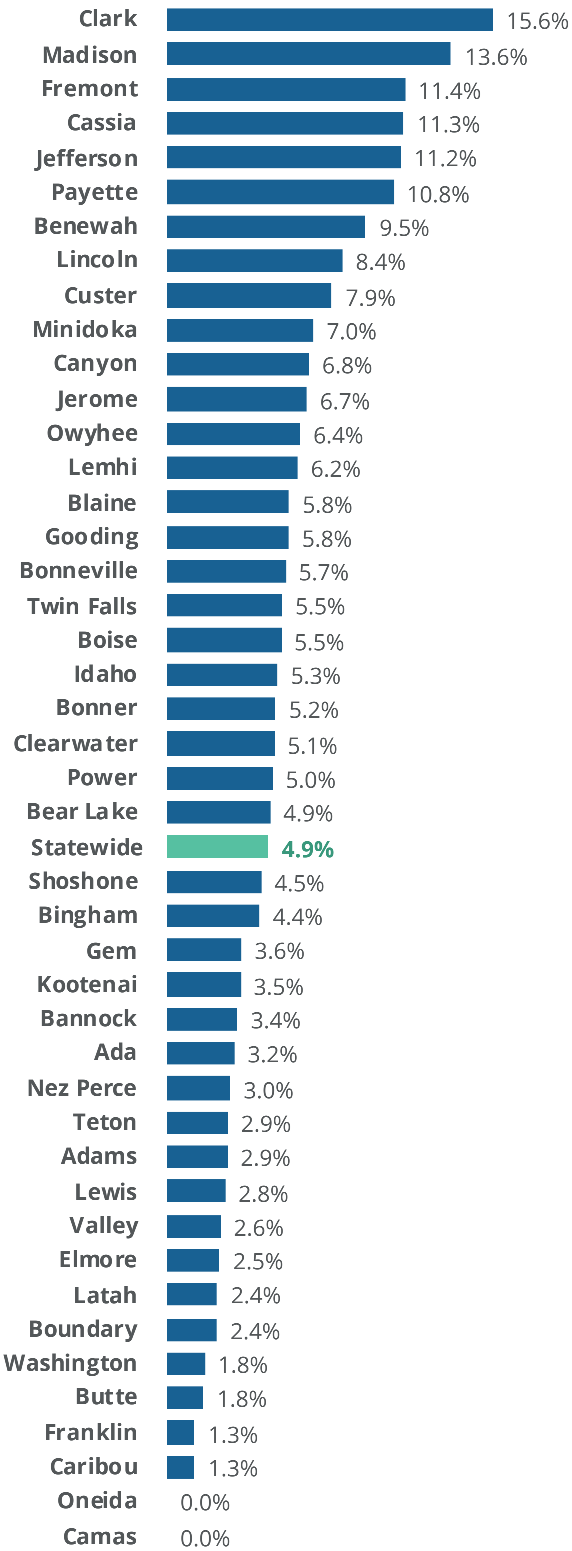
Source:
2019 5-year ACS estimates and Root Policy Research.



As illustrated in Figures II-27 and II-28, overcrowding rates among renters were especially high in Clark (15.6%), Madison (13.6%), Fremont (11.4%), Cassia (11.3%), and Jefferson (11.2%) counties. There were also relatively high overcrowding rates among homeowners in Madison County (4.7%), along with homeowners in Owyhee (4.9%), Gooding (4.3%), and Payette (4.3%) counties. Notably, Clark County, which had the highest renter overcrowding rate in the state, recorded 0% overcrowding among owners, suggesting a high level of inequality in housing quality in the county.

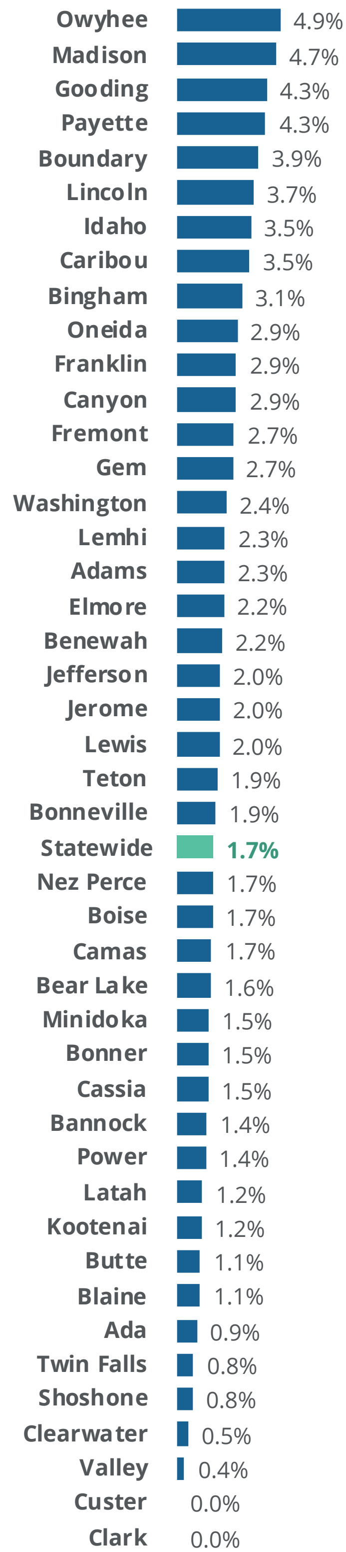
[7] Maani, S., Vaithianathan, R., & Wolfe, B. (2006). *Inequality and health: Is housing crowding the link?* (No. 1124-2019-3324).

Figure II-27. Overcrowded Renter Households by County, 2019



Source: 2019 5-year ACS estimates and Root Policy Research.

Figure II-28. Overcrowded Owner Households by County, 2019



Source: 2019 5-year ACS estimates and Root Policy Research.

Affordability gaps. Why are so many households facing cost burdens and overcrowding? Is it due to a lack of affordable housing in the state? The following analysis compares the supply of rental and ownership housing with demand along lines of affordability. For this gaps analysis, housing demand is defined as what renters at various income levels can afford to rent or buy. Supply of housing is represented as the distribution of rental and ownership housing. Like other data in this section, the source of data for the gaps analysis is the 2019 5-year Census American Community Survey (ACS), because it is available for every county in the state.

For the State of Idaho overall, 27% of renter households, or 51,178 renting households, earned less than $20,000 per year according to 2019 ACS data. To avoid being cost burdened, these renters needed units that rent for less than $500 per month, including utilities costs. Approximately 24,433 rental units were affordable for these renters. Assuming an even distribution across the income bracket, this means there is a gap of about 26,745 rental units statewide for households earning less than $20,000.

The counties with the largest rental gaps for households earning less than $20,000 per year included:

- Ada County (gap of 9,020 units priced less than $500 per month, including utilities)
- Canyon County (3,526 rental gap)
- Bonneville County (2,234 rental gap)
- Kootenai County (2,095 rental gap)

Very few counties had enough units to rent to households earning less than $20,000 per year. Counties that had at least 10 additional units priced at $500 or less compared to the population earning less than $20,000 were Boundary, Butte, Caribou, Clark, Gooding, Jefferson, and Power Counties.[8]

Statewide, 43,052 renter households earned between $20,000 and $34,999 per year. To avoid being cost burdened, these renters need units which cost between $500 and $875 per month, including utility costs. Approximately 74,587 units within this bracket, meaning there should be a sufficient number of rental units for those earning between $20,000 to $34,999 per year. However, margins were thinnest in Power County (which had a gap of 4

[8] Several assumptions of the model should be considered. First, vacant for-rent homes and those currently occupied without cash rent are assumed to have a rent distribution equal to that of the counties' occupied, cash rent distribution. In reality, many unoccupied units for rent may be priced higher than those that are occupied. Similarly, units currently occupied by individuals not paying cash rent are likely unique situations in which people are living with family or paying in labor or some other in-kind transfer. Additionally, households earning more than $20,000, for instance, are occupying units below 30% of their income, thus taking up stock for those who can only afford homes which rent for less than $500. Therefore, these gaps are likely underestimates of actual need and demand.

units for this income group), Clark County (just 18 surplus), and Camas County (just 20 surplus).

Gaps at higher ends of the income spectrum suggest that many with incomes of more than $50,000 per year are renting units that cost less than 30% of their monthly income and taking up the affordable housing stock for lower income groups. In fact, the gap for renters earning more than $50,000 per year is a positive 29,739 units statewide.

Figure II-29.
Renter Affordability, State of Idaho, 2019

Note:

Assuming affordable rents are 30% or less of household income.

Source:

2019 5-year ACS estimates and Root Policy Research.

Income Group	Affordable Rent per Income Group	Percent of Rental Units Considered Affordable
Less than $5,000	$125	<1%
$5,000 to $9,999	$250	2%
$10,000 to $14,999	$375	3%
$15,000 to $19,999	$500	6%
$20,000 to $24,999	$625	10%
$25,000 to $34,999	$875	27%
$35,000 to $49,999	$1,250	34%
$50,000 to $74,999	$1,875	11%
$75,000 to $99,999	$2,500	4%
$100,000 to $149,999	$3,750	1%
Cumulatively:		
< $35,000	< $875	49%
< $50,000	< $1,250	84%
< $75,000	< $1,875	95%

These choices may be driven by limitations in the homeownership market: if moderate income renters can become homeowners, they would free up needed rental stock. As such, a gaps analysis was also conducted for ownership, using the proportion of affordable homes to buy in each county. Home value data from the Census were used as a proxy for the price distribution of homes for sale—which likely underestimates the gap, as aggregate home values do not necessarily capture home prices actually for sale in the market.

This analysis suggests that 33% of homes are affordable to renters earning less than $35,000 statewide. Renters earning $50,000 have an easier time finding an affordable home to buy, but still only 54% of homes are affordable to them. The distribution of home values considered affordable to different income groups is shown below.

Figure II-30. Homeownership Affordability, State of Idaho, 2019

Note: Affordable home price assumes a 30 year loan at 3.8%, the average of the past 5 years as reported by Freddie Mac.

Source: 2019 5-year ACS estimates, FreddieMac.com, and Root Policy Research.

Income Group	Affordable Home Price per Income Group	Percent of Owner-occupied Housing Stock Considered Affordable
Less than $5,000	$21,705	4%
$5,000 to $9,999	$43,415	3%
$10,000 to $14,999	$65,125	3%
$15,000 to $19,999	$86,835	5%
$20,000 to $24,999	$108,544	10%
$25,000 to $34,999	$151,964	17%
$35,000 to $49,999	$217,093	26%
$50,000 to $74,999	$325,642	18%
$75,000 to $99,999	$434,190	7%
$100,000 to $149,999	$651,287	4%
$150,000 or more	$651,291+	3%
Cumulatively:		
< $35,000	$151,964	41%
< $50,000	$217,093	67%
< $75,000	$325,642	86%

Some counties had few homes affordable for renters making less than $35,000 to purchase. For example, only 9.5% of homes in Teton County were affordable for households making less than $35,000. Similarly, only 11% of homes in Blaine County and 15% of homes in Ada County were affordable to families making less than $35,000. Some of the more affordable counties for homeownership were Butte County (where 63% were affordable to households earning less than $35,000 per year), Clark County (65%), Lewis County (62%), and Shoshone County (65%).

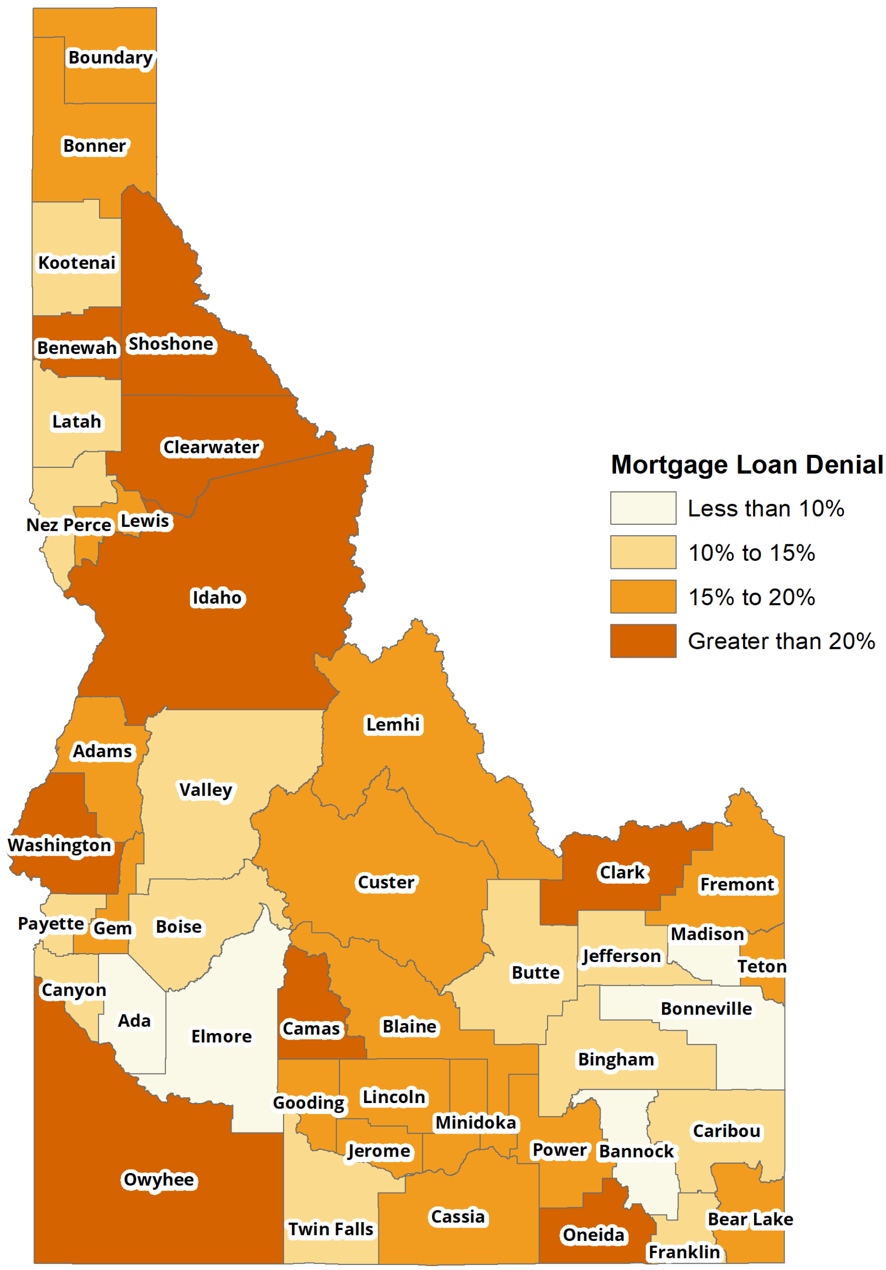
Differences in access to credit. All households seeking mortgages are included in Federal Home Mortgage Disclosure Act (HMDA) data. This section uses these data to illustrate denial rates and high-priced loans ; Section III examines differences in denials by protected class. The HMDA data analyzed in this section reflect loans applications in 2020.

Overall,154,119 individuals or households applied for some type of mortgage loan in Idaho in 2020, including those seeking refinancing or financing for home improvements. Of all applications, one third (34%) were for properties in Ada County (52,056). Canyon and Kootenai counties also had high numbers of mortgage applications: about 14% (21,306) of the state's loan applications were in Canyon County and another 12% (17,749) were in Kootenai County. Clark, Camas, Lewis, and Butte counties each had fewer than 200 applications, making them the counties with the fewest mortgage applications. The vast majority (99%) of applications were for one-unit dwellings.

In the state overall, 12% of applications were denied. This is on par with neighboring states: the overall denial rate in Oregon, for instance, was 13%. Figure II-31 shows the denial rate by county for those with highest and lowest denial rates. Counties with the highest loan denial rates were Clark (27%), Camas (24%), Clearwater (23%), Benewah (21%), Shoshone (21%) and Washington (21%) counties. Counties with the lowest rejection rates were Madison (9%), Ada (10%), Bannock (10%), Bonneville (11%), Jefferson (11%), and Elmore (11%).

Figure II-31. Mortgage Loan Denial Rates by County, 2020

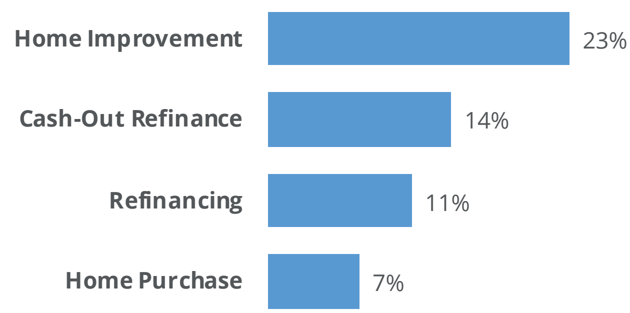
Source:
2020 HMDA data.



Loan denial rates can also vary based on the type of loans applied for by applicants, as shown in the figure below. Denial rates are the highest for home improvement loans (23% statewide), cash-out refinance loans (14%), and refinancing loans (11%). Home purchase denial rates are the lowest at 7% statewide.

Denial rates are typically highest for home improvement loans, often because the additional debt will raise the loan to value ratios above the levels allowed by a financial institution. This may also be true of cash-out refinance loans, depending on how much cash is requested.

Figure II-32.
Denial Rates by Loan Type, State of Idaho, 2020



Source:
2020 HDMA data and Root Policy Research.

Although income is a not a factor in credit scores, it can be used as a proxy to norm the qualifications of applicants. Statewide, 18% of mortgage applicants earning less than 80% of the area median family income (AMI) were rejected, a considerably higher rate than those making 80% to 120% of AMI (10%) and those making more than 120% of AMI (9%).

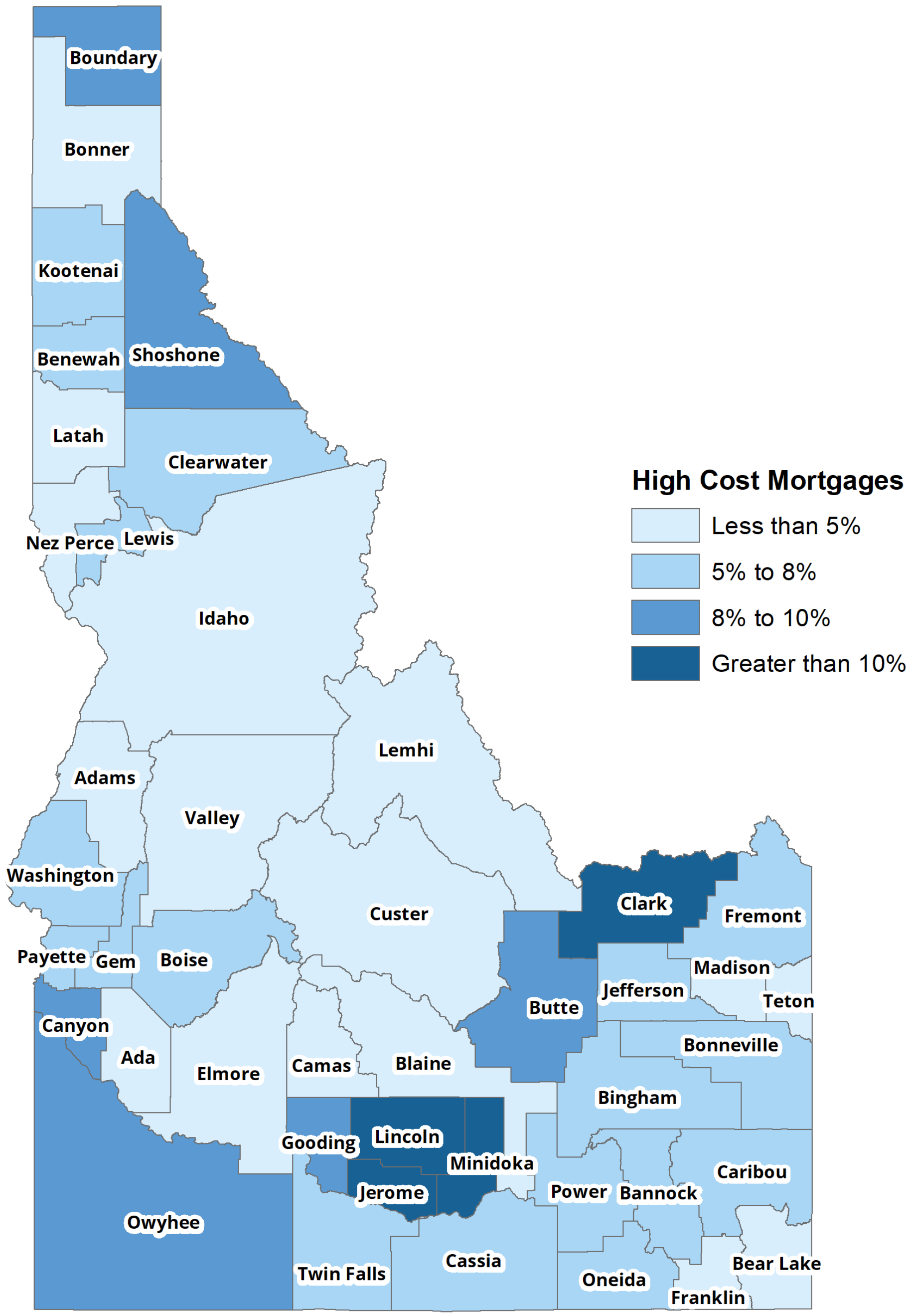
High-priced loans. While subprime lending has decreased dramatically since 2006, analysis of differences in "high priced" loans can be used to identify where additional scrutiny is warranted, and how public education and outreach efforts should be targeted. For the purpose of this section, we define loans as "high priced" if the APR exceeded the average prime offer rate (APOR) for loans of a similar type by at least 1.5 percentage points for first-lien loans.

In 2020, 6% of mortgage loans made in Idaho were considered high-priced loans. Figure II-33 shows where high priced loans are most prevalent in the state. Clark County had the highest proportion of high-cost loans in 2020, with 14% of the of the county's first-lien loans having an APR that exceeded the average prime offer rate (APOR) by at least 1.5 percentage points. Lincoln and Minidoka counties also had a large share of high-cost loans, with 12% and 11% of first lien loans qualifying as high cost, respectively. Ten percent of loans in Jerome County, Owyhee County, and Boundary County were high price in 2020. High-cost loans were least prevalent in Valley, Lemhi, Blaine, and Latah counties, where less than 3% of loans were high cost.

Figure II-33. High-cost Mortgages by County, 2020

Source:

2020 HMDA data.



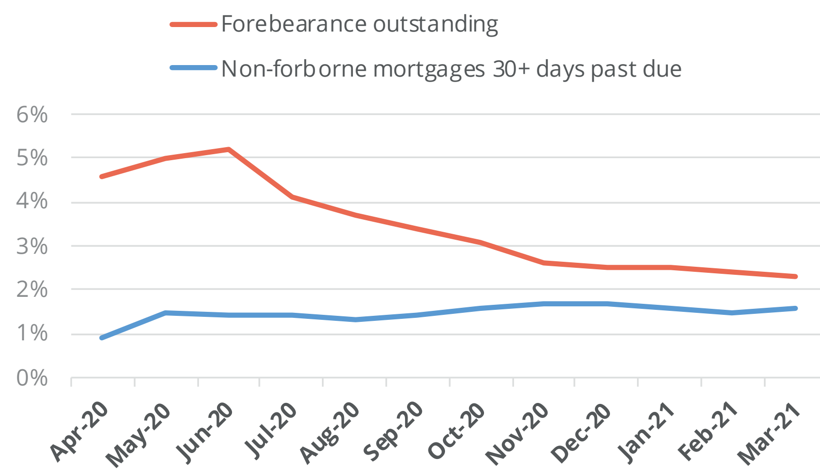
Housing Precarity for Homeowners

Many homeowners with mortgages faced a great deal of financial uncertainty during the COVID-19 pandemic. This section examines recent mortgage non-payment and foreclosure data across the state.

COVID-19 pandemic & mortgage non-payment. The federal CARES Act made mortgage forbearance available to homeowners with a federally backed mortgage during the COVID-19 pandemic. Several Idahoans took advantage of the mortgage forbearance during the pandemic, with the peak in forborne home loans occurring in June 2020 where 5.2% of mortgages in Idaho were forborne. This is lower than the national average of 9.5% during the same month.

Several Idahoans fell behind on mortgage payments where they were not forborne. As of March 2021, 1.6% of non-forborne mortgages in Idaho were more than thirty days past due. This is lower than the national average (2.8%), but not much improved from the state's peak rate of late mortgage payments in November and December of 2020 (1.7%). Figure II-34 illustrates both rates of mortgage non-payment from April 2020 to March 2021.

Figure II-34. Mortgage Non-Payments, State of Idaho, 2020 to 2021



Source:

Mortgage Analytics and Performance Dashboard, Atlanta Federal Reserve

Mortgage non-payment rates are not evenly spread across the state. Figure II-35 illustrates the most recent county-level data for forborne loans and late mortgage payments. Note that data are not available for Butte, Camas, Clark, Lewis, Lincoln, Madison, and Power counties.

Bingham, Lemhi, and Minidoka counties had the highest forbearance rates in the state as of March 2021: 4% of loans in Bingham County and 3.7% of loans in Lemhi and Minidoka counties were forborne. Those with the lowest forbearance rates were Custer County (0.9%), Bear Lake County (1.1%), and Caribou County (1.2%). Overall, however, these are very low rates of the inability to service mortgage debt.

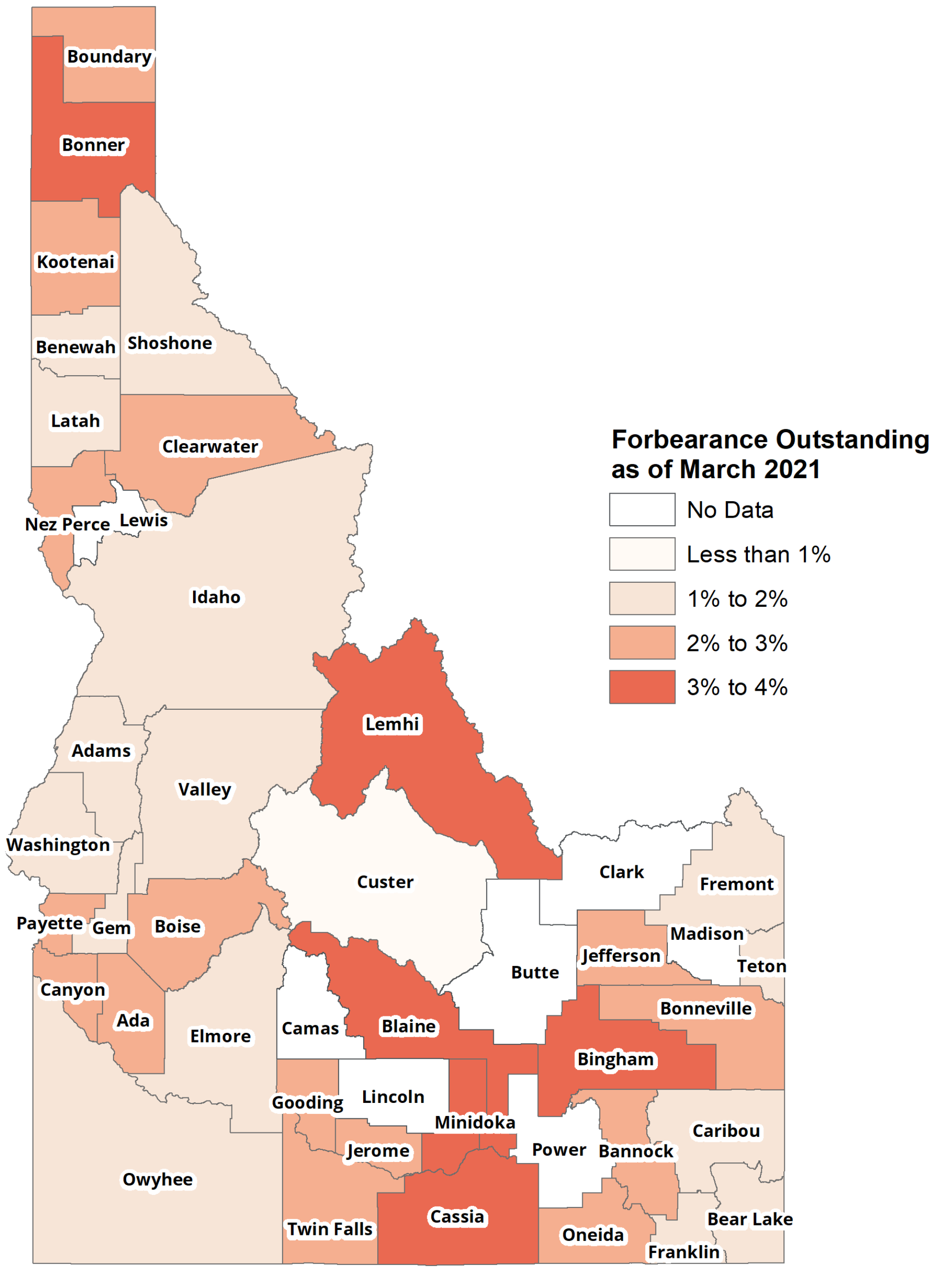
Figure II-35. Forbearance Rates by County2021

Note:

Data are not available for Butte, Camas, Clark, Lewis, Lincoln, Madison, and Power counties.

Source:

Mortgage Analytics and Performance Dashboard, Atlanta Federal Reserve.



Counties with the lowest shares of late mortgage payments (for non-forborne loans) were Caribou (0%), Clearwater (0.5%), Teton (0.5%), and Boise (0.8%). Many more homeowners in Minidoka, Owyhee, and Jefferson counties were overdue on their mortgage payments: 4.6% in Minidoka County, 4% in Owyhee County, and 3.1% in Jefferson County.

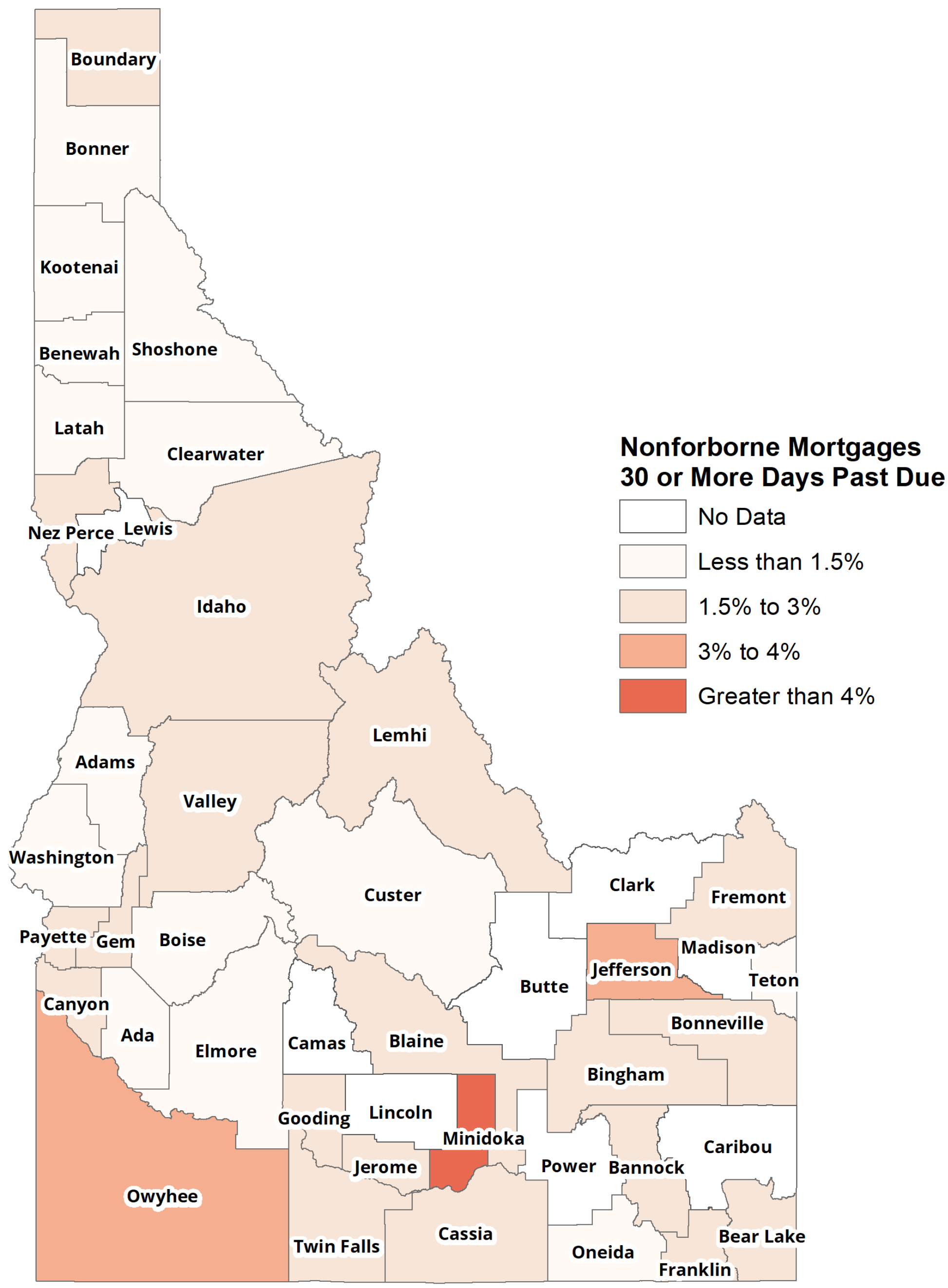
Figure II-36. Non-forborne Mortgages 30 or More Days Past Due by County, 2021

Note:

Data are not available for Butte, Camas, Clark, Lewis, Lincoln, Madison, and Power counties.

Source:

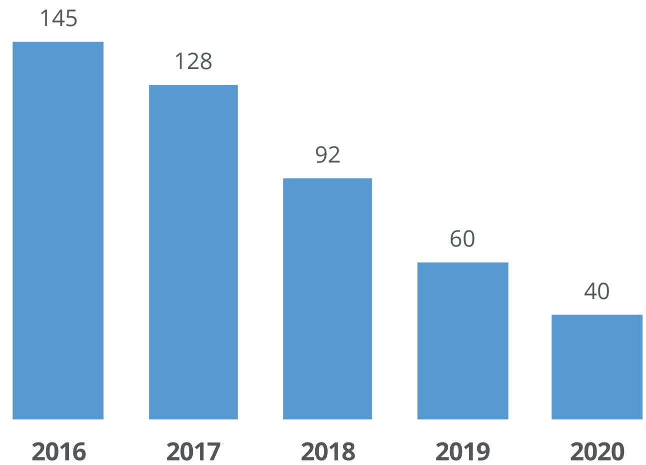
Mortgage Analytics and Performance Dashboard, Atlanta Federal Reserve.



Foreclosures. Because of COVID-relief forbearance programs, there was a very low number of foreclosures in 2020. However, foreclosures have been decreasing across the state for a number of years before the COVID pandemic. According to data from IHFA, foreclosures have been decreasing in Idaho since 2016. In 2016, there were 145 foreclosures but by 2020 there were only 40 foreclosures across the entire state. There were 465 foreclosures throughout the state over the five year period.

Figure II-37. Foreclosures, State of Idaho, 2016 to2020

Source:
IHFA.



Most of the 465 foreclosures between 2016 and 2020 took place in Ada (11%), Bannock (15%), Bonneville (11%), and Canyon (15%) counties. When controlling for the number of housing stock, Power County had the highest number of homes foreclosed as a percent of the housing stock: 2.3 per every 1000 housing units were foreclosed upon in Power County between 2016 and 2020. As indicated in Figure II-38, Bannock County, Clark County, Minidoka County, Power County, and Washington County each had at least 1.5 homes foreclosed per every thousand units in their housing stock between 2016 and 2020—with Power County's rate higher than any other county's rate.

Figure II-38. Foreclosures per 1,000 Housing Units by County, 2016 to2020

Source:

IHFA.

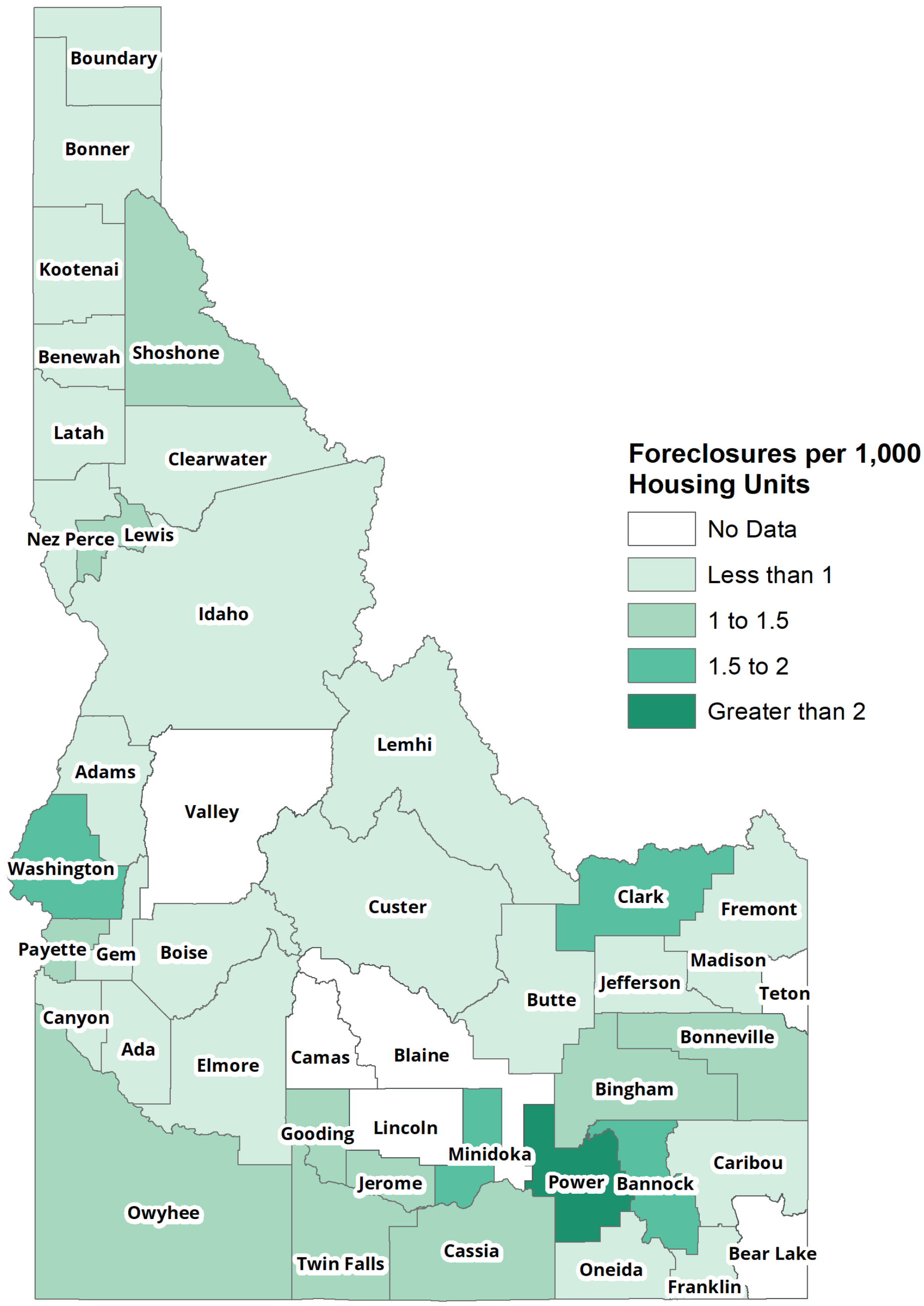


Figure II-39. Foreclosures per 1,000 Housing Units by County, 2016 to 2020

Source:
IHFA and Root Policy Research.

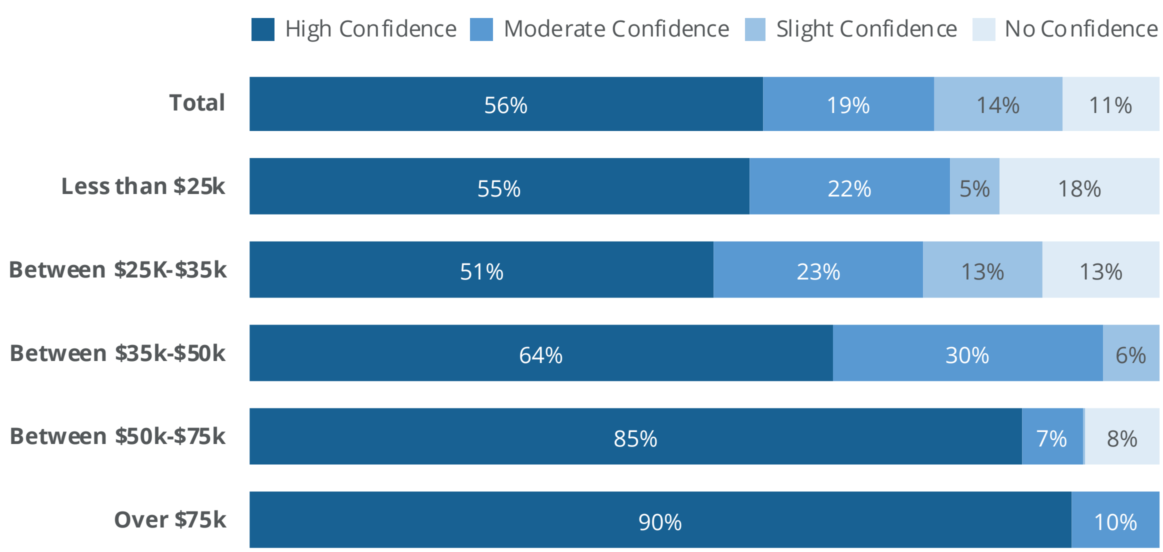
	Number of Foreclosures	Foreclosures per 1,000 Housing Units
Idaho (statewide)	**465**	**0.64**
Ada County	52	0.29
Adams County	1	0.37
Bannock County	68	1.98
Bear Lake County	0	0.00
Benewah County	3	0.63
Bingham County	22	1.31
Blaine County	0	0.00
Boise County	1	0.18
Bonner County	2	0.08
Bonneville County	50	1.16
Boundary County	1	0.18
Butte County	1	0.78
Camas County	0	0.00
Canyon County	71	0.93
Caribou County	2	0.61
Cassia County	10	1.14
Clark County	1	1.78
Clearwater County	1	0.22
Custer County	1	0.31
Elmore County	6	0.48
Franklin County	1	0.21
Fremont County	3	0.33
Gem County	4	0.54
Gooding County	9	1.44
Idaho County	2	0.23
Jefferson County	4	0.43
Jerome County	10	1.17
Kootenai County	28	0.39
Latah County	1	0.06
Lemhi County	2	0.41
Lewis County	2	1.03
Lincoln County	0	0.00
Madison County	3	0.21
Minidoka County	13	1.59
Nez Perce County	3	0.17
Oneida County	1	0.50
Owyhee County	7	1.42
Payette County	12	1.27
Power County	7	2.32
Shoshone County	10	1.40
Teton County	0	0.00
Twin Falls County	42	1.26
Valley County	0	0.00
Washington County	8	1.72

Housing Precarity for Renters

Renters too faced a great deal of financial uncertainty during the pandemic. Compared to homeowners, renters in Idaho had higher rates of cost burden in 2019, indicating that even before the pandemic, many households faced financial crunches. Renter households facing cost burdens and affordability challenges also often face concerns of eviction. This section examines how affordability challenges have materialized for renters, including an inability to pay rent and likelihood of eviction.

Ability to pay rent. June 2021 Pulse Survey data from the Census provide recent information about renters' confidence in their ability to pay next month's rent. Figure II-38 illustrates these data stratified by income group. Around half of households earning less than $35,000 had high confidence in their ability to pay next month's rent, with the other half having moderate to no confidence. Additionally, just over 16% of households with children in Idaho in June 2021 indicated they had no confidence in their ability to pay their next rent bill compared with just 4% of households without children.

Figure II-40.
Confidence in Ability to Pay Next Month's Rent by Income Group, State of Idaho, 2021

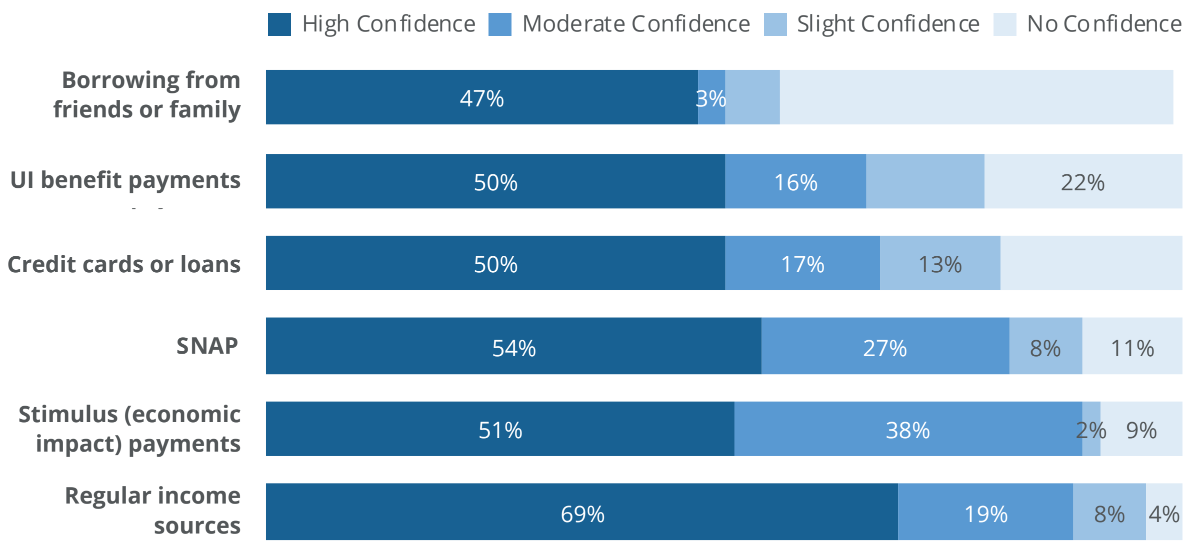


Source: U.S. Census Pulse Survey, June 7, 2021.

Available Pulse data also disaggregate renter confidence data by households' sources of funding to meet the last weeks' worth of spending needs. These can include, among others, use of unemployment insurance (UI) benefits, Supplemental Nutrition Assistance Program (SNAP) benefits, credit cards/loans, stimulus (economic impact) payments, or informal borrowing. As demonstrated in Figure II-39, between 10% to 22% of respondents in most of these groups had no confidence in their ability to pay next month's rent, as compared to just 4% of those using regular income sources (like those used before the pandemic).

However, those borrowing from friends or family indicated much less confidence: 43% of those using informal borrowing to cover expenses had no confidence in their ability to pay next month's rent.

Figure II-39.
Confidence in Ability to Pay Next Month's Rent by Source used to Cover Expenses in the Last 7 Days, State of Idaho, 2021



Source: U.S. Census Pulse Survey, June 7, 2021.

Evictions. According to 2016 data from the Princeton University Eviction Lab, the statewide eviction rate was 0.6%, much lower than the national average of 2.3% and lower than in neighboring Washington (0.8%), Montana (0.9%), Wyoming (0.9%), Utah (0.9%), Oregon (1.1%) and Nevada (3.4%). However, the average eviction rate was not as low in every part of the state. Of the available data, counties with highest eviction rates in the state in 2016 were Power County (1.8%), Lincoln County (1.5%), Gem County (1.2%), Canyon County (1.1%), and Kootenai County (1.1%). The most populous county, Ada County, had an estimated eviction rate of 0.42%.

However, these figures look a bit grimmer when considering more recent data. According to Census Pulse data, 18% of Idaho residents were facing likelihood of eviction or foreclosure as of June 2021. Again, compared to other states (and the national average of 33% of US residents facing eviction or foreclosure), this figure is relatively low.

Publicly Supported Housing

Even those relying on publicly supported housing are experiencing housing precarity. For instance, in this section we discuss how in some areas of the state, Fair Market Rents have been substantially lower than average rents, leaving some voucher holders to make up the difference on their own.

Overview of the publicly supported housing market. According to HUD's 2020 Picture of Subsidized Housing data, there are 12,563 total HUD assisted housing programs in the state. Many are Housing Choice Vouchers (7,625) or Project Based Section 8 housing (3,772), or public housing (677). Section 202 (385) or Section 811 (104) programs make up the remaining units. The Section 202 program funds development of affordable housing for elderly households while the Section 811 program provides funding for supportive housing for disabled, and very- and extremely-low-income people. Counties with the most subsidized housing units were Ada County (3,282), Kootenai County (1574), Bonneville County (1120), Bannock County (1082), and Twin Falls County (908). However, counties with the most subsidized housing units as a percent of total housing stock were Lewis (4.6%), Nez Perce (4.6%), Bannock (3.2%), Shoshone (2.7%), and Twin Falls (2.7%).

To qualify most housing programs, a household's income must be at or below 50% of the area median income (AMI). Therefore, to illustrate over- and under-representation in subsidized housing by race and ethnicity, we include estimates of the percent of households with an income less than or equal to 50% of the AMI by county and by race in Figure II-40. In every county where data are available, White households are overrepresented among beneficiaries of publicly assisted housing. Hispanic, Black, or Native American households are only overrepresented in a small handful of counties and are underrepresented in assisted housing statewide.

Figure II-40. Assisted Housing Beneficiaries by County, 2019

Note:

Data are not available for Adams, Butte, Camas, Clark, Custer, Oneida, Owyhee, Teton, and Valley counties.

Source:

5-year 2019 ACS estimates; HUD 2020 picture of subsidized housing, and Root Policy Research.

	Program Beneficiaries				≤50% AMI				Percentage Point Difference			
County	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Non-Hispanic White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Non-Hispanic White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Non-Hispanic White
Idaho (statewide)	**10%**	**4%**	**2%**	**82%**	**32%**	**39%**	**41%**	**27%**	**-22%**	**-35%**	**-39%**	**55%**
Ada	6%	10%	2%	78%	34%	40%	47%	26%	-28%	-30%	-45%	52%
Bannock	11%	2%	4%	82%	44%	64%	48%	28%	-33%	-62%	-44%	54%
Bear Lake	3%	0%	5%	90%	52%	41%	68%	24%	-49%	-41%	-63%	66%
Benewah	3%	3%	5%	85%	21%	0%	36%	24%	-18%	3%	-31%	61%
Bingham	11%	2%	4%	81%	24%		46%	23%	-13%		-42%	58%
Blaine	37%	0%	3%	59%	39%		0%	28%	-2%		3%	31%
Boise	9%	0%	9%	73%	34%		100%	33%	-25%		-91%	40%
Bonner	2%	0%	3%	94%	39%		72%	28%	-37%		-69%	66%
Bonneville	12%	3%	3%	80%	30%	33%	39%	28%	-18%	-30%	-36%	52%
Boundary	4%	0%	0%	80%	0%		34%	26%	4%		-34%	54%
Canyon	29%	1%	1%	66%	36%	54%	32%	32%	-7%	-53%	-31%	34%
Caribou	3%	0%	3%	91%	34%			30%	-31%			61%
Cassia	27%	1%	0%	72%	19%		28%	22%	8%		-28%	50%
Clearwater	0%	0%	2%	98%	47%	25%	37%	27%	-47%	-25%	-35%	71%
Elmore	18%	2%	2%	78%	39%	32%	66%	27%	-21%	-30%	-64%	51%
Franklin	0%	0%	0%	100%	47%	54%	0%	21%	-47%	-54%	0%	79%
Fremont	2%	2%	0%	93%	43%	100%	4%	20%	-41%	-98%	-4%	73%
Gem	5%	0%	2%	92%	47%		46%	24%	-42%		-44%	68%
Gooding	0%	0%	0%	100%	16%		0%	24%	-16%		0%	76%
Idaho	4%	0%	1%	94%	29%		13%	29%	-25%		-12%	65%
Jefferson	12%	0%	0%	88%	28%		7%	18%	-16%		-7%	70%
Jerome	12%	1%	0%	86%	24%		0%	26%	-12%		0%	60%
Kootenai	4%	1%	1%	92%	12%	9%	41%	25%	-8%	-8%	-40%	67%
Latah	1%	2%	4%	91%	59%	21%	38%	32%	-58%	-19%	-34%	59%
Lemhi	2%	0%	6%	92%	23%		0%	34%	-21%		6%	58%
Lewis	0%	0%	4%	94%	47%	0%	51%	32%	-47%	0%	-47%	62%
Lincoln	0%	5%	5%	91%	26%		23%	21%	-26%		-18%	70%
Madison	8%	3%	3%	82%	44%			27%	-36%		3%	55%
Minidoka	19%	0%	4%	75%	26%		51%	22%	-7%		-47%	53%
Nez Perce	2%	1%	5%	91%	22%	0%	36%	26%	-20%	1%	-31%	65%
Payette	6%	1%	0%	92%	14%		55%	23%	-8%		-55%	69%
Power	29%	0%	0%	71%	21%	0%	37%	22%	8%	0%	-37%	49%
Shoshone	1%	1%	2%	90%	64%	0%	72%	27%	-63%	1%	-70%	63%
Twin Falls	11%	4%	1%	82%	31%	59%	18%	29%	-20%	-55%	-17%	53%
Washington	14%	0%	4%	82%	30%		99%	27%	-16%		-95%	55%

Voucher holders making up the difference. Housing voucher tenants pay 30% of their monthly adjusted gross income for rent and utilities, and if the unit's rent is greater than the payment standard set by the Public Housing Authority, the tenant is required to pay the difference amount. The payment standard determined by the Public Housing Authority is between 90% and 110% of the Fair Market Rents. Figure II-41 illustrates the difference between Fair Market Rents (FMRs) and median gross rent for a two-bedroom unit in each county in 2019.

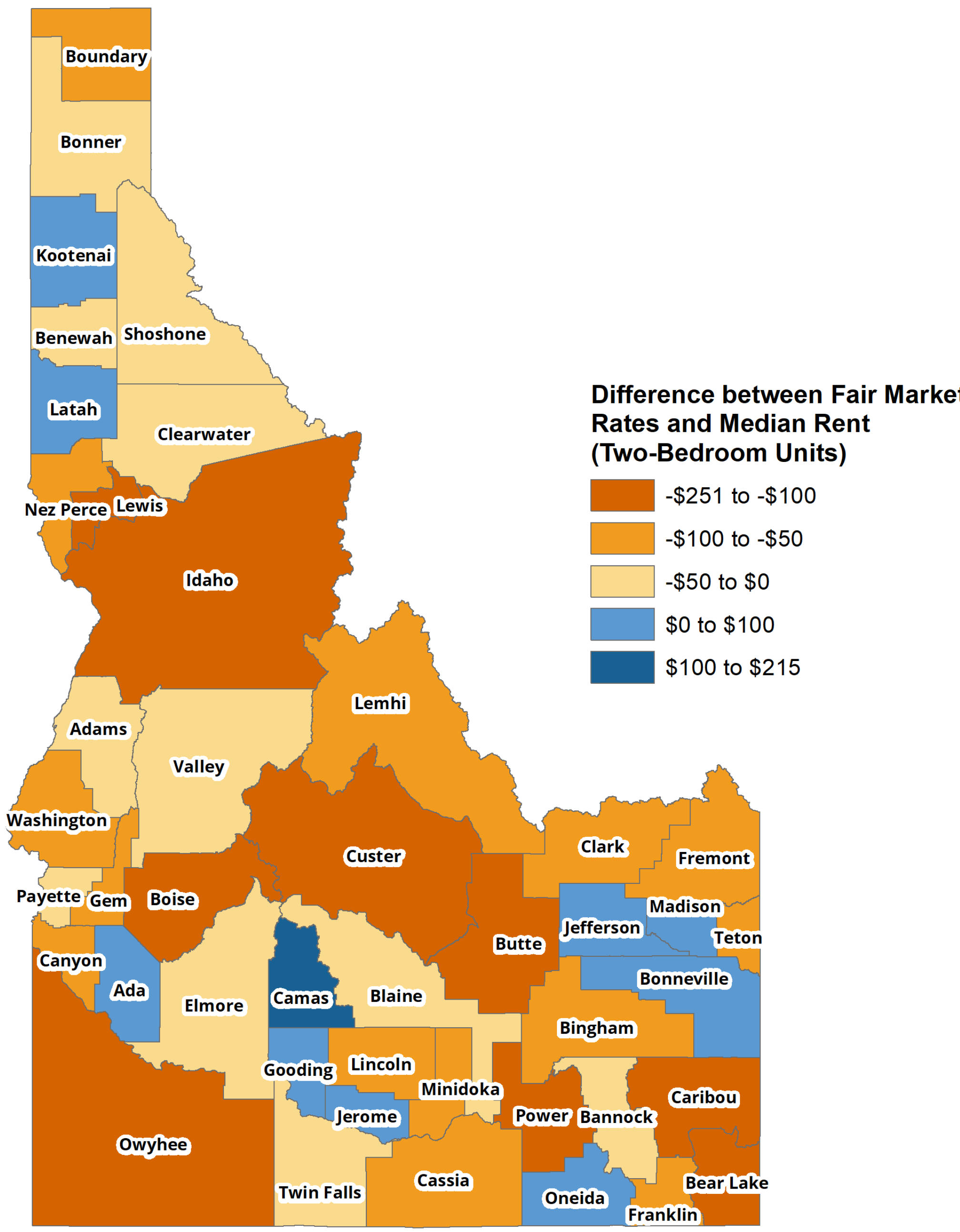
Figure II-41. Difference between Fair Market Rates and Median Rents by County, 2019

Note:

These figures show the difference between FMRs and median gross rent for two-bedroom units.

Source:

5-year 2019 ACS estimates, HUD FY 2019 Fair Market Rent Documentation System, and Root Policy Research.



Median rent in smaller units (studio, one-bedroom, and two-bedroom units) are more often closer to FMR. FMR exceeds median rent by $51 on average in two-bedroom units, by $86 in one-bedroom units, and by just $3 in efficiency/studio units.

However, there are some major outliers. For instance, studio, one-bedroom, and two-bedroom units in Ada County all have a median rent higher than the FMR. Other outliers include Camas County, where two-bedroom homes rent an average of $215 more than the FRM. Similarly, one-bedroom homes in Fremont County rent an average of $114 more than their FRM and efficiency/studio units in Teton County rent an average of $410 more than the FRM.

For larger housing units (three- and four-bedroom homes), the FMR is often higher than median rents in each county (with Teton County being the primary exception, where median rents are higher than the FMR in both three- and four-bedroom units). In fact, among four-bedroom units, FMR exceeds median rent by an average of $251. Among three-bedroom units, FMR exceeds median rent by $162 on average.

Homelessness in Idaho

Renters utilizing public support, private renters, and owners alike face risks of homelessness during times of financial precarity. In January 2021, the Point in Time Count identified 1,889 people (in 644 households) experiencing homelessness in Idaho. Forty-six percent of those individuals were not sheltered and just over half (54%) were sheltered.

Seventy percent of sheltered individuals were in emergency shelter, while the remaining 30% were in transitional housing.

About half (52%) of those who were not sheltered were living in vehicles and the remaining 419 were outside or in some non-housing structure.

Nearly half (48%) of households were households with children. Eleven percent of those in shelter were victims of domestic violence. Compared to other peer states, Idaho's housing regulations for victims of domestic violence are less robust. Many states allow victims to terminate leases early without fees, change locks without fees, or prevent them from facing eviction as a result of a domestic disturbance. Idaho does not include such protections, which may contribute to precarious housing for victims. [9]

As indicated in Figure II-42's map, the area with the highest number of individuals experiencing homelessness was Region 3, which includes Adams, Boise, Canyon, Elmore, Gem, Owyhee, Payette, Valley and Washington counties. In Region 3 there were 653 people

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[9] Schultzman, Meliah. "Housing Rights of Domestic Violence Survivors: A State and Local Law Compendium." National Housing Law Project. (January 2013). https://nhlp.org/files/Domestic%20violence%20housing%20compendium%20FINAL7.pdf

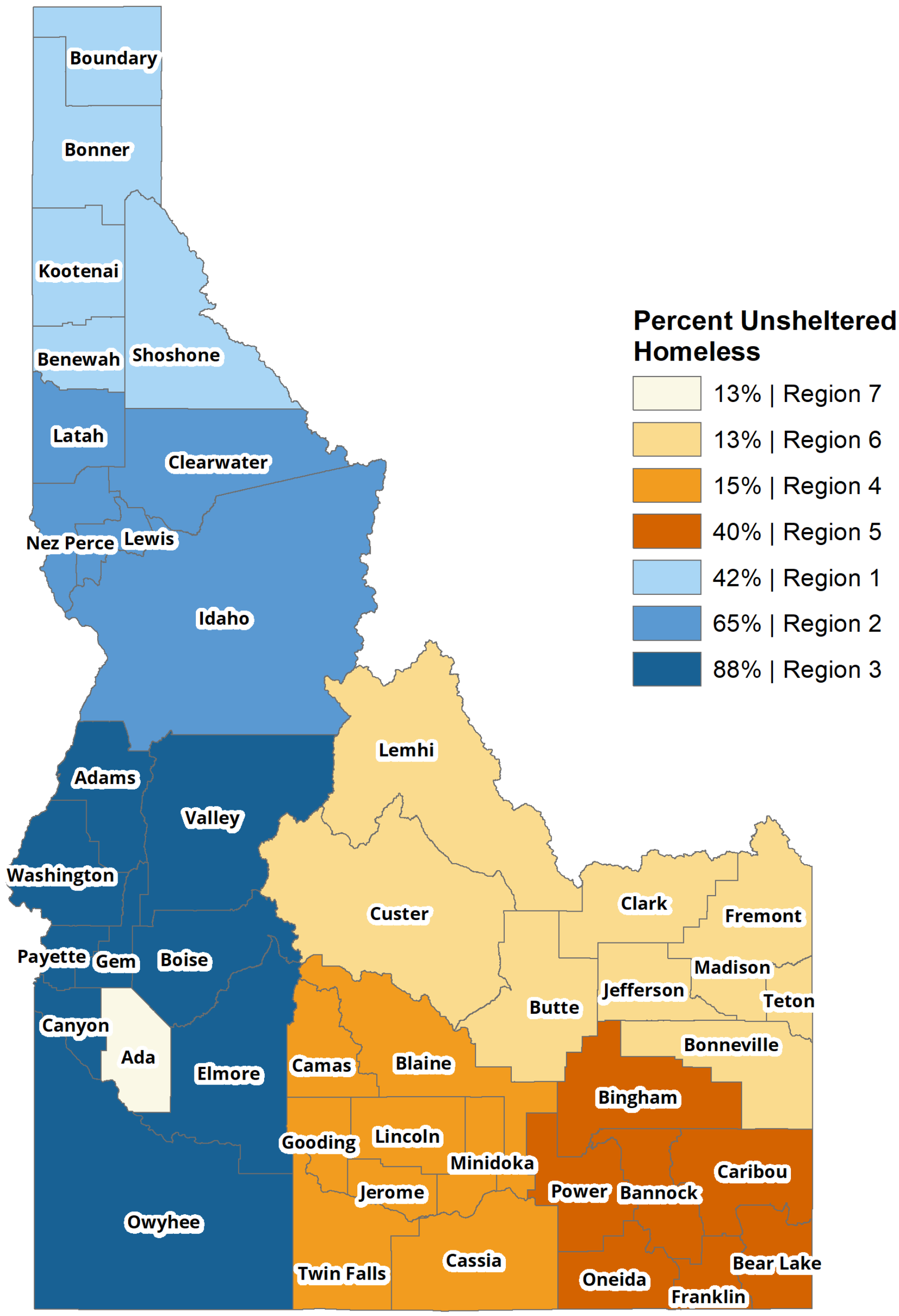
experiencing homelessness, 88% of which were unsheltered: the highest rate of unsheltered individuals in the state. Ada County also had a large number of people experiencing homelessness (575) but the vast majority of them (87%) were sheltered.

Region 2, which includes Clearwater, Idaho, Latah, Lewis and Nez Perce counties, also had a high rate of people living without emergency or transitional shelter: with 65% of the 164 people experiencing homelessness were unsheltered. Other areas had fewer people experiencing homelessness and higher rates of shelter. Region 6, which includes Bonneville, Butte, Clark, Custer, Fremont, Jefferson, Lemhi, Madison, and Teton counties had the highest rate of shelter: with 87% of the 62 people experiencing homelessness in some type of emergency or transitional shelter.

Figure II-42. Percent of People Experiencing Homelessness who are Unsheltered by Region, 2021

Source:

January 2021 State of Idaho Point in Time Count.



SECTION III.

DISPROPORTIONATE HOUSING NEEDS

SECTION III.
Disproportionate Housing Needs

This section of the Idaho Analysis of Impediments to Fair Housing Choice (AI) examines how barriers to housing choice disproportionately affect protected classes, namely by race, ethnicity, and disability status.

This section begins with an overview of the housing experiences of White, Black or African American, Native American, Asian, and Hispanic Idahoans. The second portion of this section focuses on the experiences of Idahoans with disabilities.

- Disproportionate housing needs are measured through:
- Homeownership rates and access to credit;
- Housing cost burden and ability to pay rent;
- Housing condition; and
- Accessibility.

Though this report examines race and ethnicity separately from disability, it is important to note that households of various race groups also include members with disabilities. Therefore, many of the issues faced by already disadvantaged groups are compounded at different intersections of social identity. Data limitations keep us from examining many of these intersections.

Primary Findings

- Compared to homeowners of other racial and ethnic groups in the state, Black homeowners are most likely to be cost burdened: 30% of Black homeowners are cost burdened and 11% are severely cost burdened. However, Native American homeowners the highest rates of severe cost burden: 20% are cost burdened and 12% are severely cost burdened. White and Hispanic homeowners experienced less cost burden statewide: 7% of each group experienced severe cost burden.

- Among renters, Native American and White renters were most likely to be cost burdened, with 46% of Native American and 41% of White renters experiencing cost burden and 20% in each group experiencing severe cost burden.

- Racial and ethnic minority households are more likely to be overcrowded: just 2.8 % of households in Idaho are considered overcrowded, but this is higher among Hispanic (8.2%), Black (6.0%), and Native American (4.2%) households.

- The majority of individuals experiencing homelessness in Idaho are White. However, relative to their overall populations, people of color are often overrepresented in their experiences of homelessness.

- 71% of White Idahoans own their homes, a much higher share than any other racial group. Black Idahoans are least likely to own their homes: just 38% of Black households own their homes. Close to half of Native American and Hispanic households own their homes: 56% and 53%, respectively. Sixty-three percent of Asian households are homeowners. Many of these disparities exist even when controlling for income,

- Hispanic mortgage applicants are denied loans at higher rates than White applicants: in 2020, 18% of loan applications made by a Hispanic household were denied as compared to 12% of White applicants. Similarly, Black or African American applicants were denied loans at a rate over 20%, as were Native Hawaiian or Pacific Islanders and Native Americans. Asian applicants were denied loans at a lower rate of 15%.

- In 2020, 6% of mortgage loans made in Idaho were considered high-priced loans. However, 11% of Hispanic borrowers received high-priced loans, as did 9% of African American/Black and 8% Native American borrowers. Just 6% of White borrowers and 3% of Asian borrowers received high priced loans.

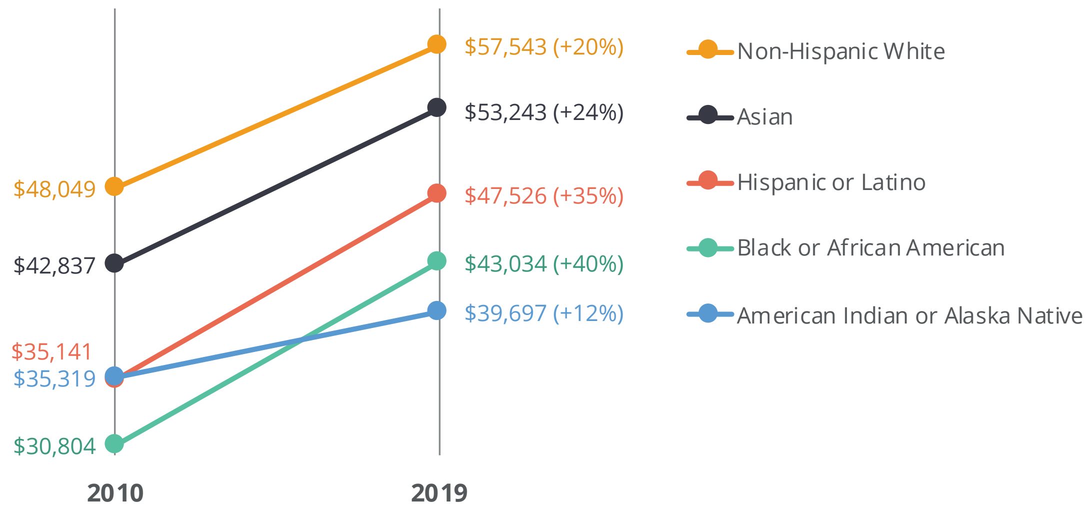
- According to HUD CHAS data (from 2017 5-year ACS), Idahoans with disabilities are more likely to live in a home with at least one of the four key housing problems identified by HUD.

Around 6% of Idaho's population has an ambulatory disability but less than 1% of the housing stock is estimated to be accessible.

Income Disparities by Race and Ethnicity

As housing prices across Idaho have increased over the last decade, some groups' incomes have been able to keep up better than others. Though non-Hispanic White households continue to earn the highest median incomes ($57,543 in 2019), Black and Hispanic households experienced stronger increases in median income than any other racial group over the decade, as illustrated in Figure III-1. Native American households experienced more stagnant income growth, experiencing only a 12% increase in their median incomes over the decade.

Figure III-1.
Change in Median Household Income by Race and Ethnicity, State of Idaho, 2010 to 2019



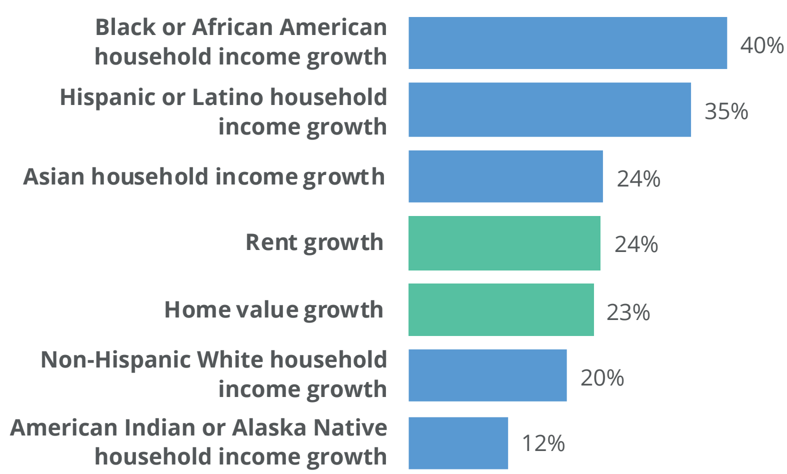
Source: U.S. Census Bureau 2010 and 2019 5-year American Community Survey (ACS) estimates, and Root Policy Research.

These disparities in income growth have meant that only some households have been able to keep up with the 23% increase in median home values, and a 24% increase in rent over the same period, as illustrated in Figure III-2. However, it is important to note that even with substantial increases in the incomes of Black and Hispanic households, their average incomes are still less than that of White and Asian households. This suggests that Hispanic, Black, and Native American households are more likely to experience cost burden, as discussed in subsequent sections. Conversely, although White household median incomes did not increase as rapidly as other households' incomes did, because their starting incomes were much higher, it is still easier for them to manage housing cost increases.

Figure III-2.
Change in Median Household Income and Housing Costs by Race and Ethnicity, State of Idaho, 2010 to 2019

Source:

U.S. Census Bureau 2010 and 2019 5-year ACS estimates, and Root Policy Research.



Affordability Challenges by Race and Ethnicity

This section examines how rates of cost burden, overcrowding, inabilities to pay rent, and homelessness differ by race and ethnicity.

Cost burden. High home loan prices along with lower and more stagnant incomes contribute to high rates of cost burden among homeowners and renters of color compared to White homeowners and renters in Idaho.

As discussed in Section II, cost burden exists when households pay more than 30% of their gross household income in housing costs. Severe cost burden exists when these costs are more than 50% household income.

Figure III-3 and Figure III-4 illustrate the proportion of owner and renter households experiencing cost burden and severe cost burden, respectively, by race and ethnicity in 2017. Note that counties with less than ten households of a specific race or ethnicity are excluded from the table.

Statewide, Black homeowners are most likely to be cost burdened. Thirty percent of Black homeowners are cost burdened and 11% are severely cost burdened. Kootenai and Bannock counites have the highest proportion of severely cost burdened Black homeowners at 100% and 63% respectively. In Kootenai County, this represents all 20 estimated Black homeowners. There were an estimated 80 total homeowning Black households in Bannock county, meaning 50 of them were severely cost burdened.

Native American homeowners the highest rates of severe cost burden: 20% are cost burdened and 12% are severely cost burdened. The highest rates were in Bonneville and Payette counties, where 52% of Native American homeowners in Bonneville County and 47% of Native American homeowners in Payette County were severely cost burdened.

White and Hispanic homeowners experienced less cost burden statewide: 7% of each group experienced severe cost burden. However, for White homeowners, Camas County and Blaine County had high rates of severe cost burden at 20% and 17% respectively. Jefferson, Lewis, and Clark County had especially high rates of severe cost burden among Hispanic homeowners: 33% in Jefferson County, 27% in Lewis County, and 22% in Clark County were experiencing severe cost burden.

Figure III-3. Cost Burdened Homeowners by Race and County, 2017

	Cost Burdened Homeowners					Severely Cost Burdened Homeowners				
	Non-Hispanic White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Non-Hispanic White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian
Metro										
Ada	19%	17%	27%	27%	20%	7%	5%	3%	20%	7%
Bannock	15%	25%	63%	7%	32%	6%	13%	63%	3%	28%
Boise	21%	26%		0%	0%	11%	9%		0%	0%
Bonneville	15%	28%	0%	76%	27%	6%	8%	0%	52%	16%
Butte	21%	16%				11%	0%			
Canyon	21%	26%	17%	25%	31%	7%	9%	0%	20%	9%
Franklin	21%	11%	43%	7%		9%	0%	43%	7%	
Gem	25%	35%		22%		10%	0%		22%	
Jefferson	16%	37%		16%		5%	33%		16%	
Kootenai	23%	11%	100%	25%	31%	9%	7%	100%	22%	8%
Nez Perce	16%	23%	0%	6%	47%	4%	8%	0%	3%	27%
Owyhee	22%	26%		12%	40%	8%	12%		0%	0%
Nonmetro micropolitan										
Bingham	15%	13%		17%	33%	5%	5%		1%	0%
Blaine	28%	22%			4%	17%	11%			4%
Bonner	27%	11%		33%	22%	11%	0%		0%	22%
Camas	30%					20%				
Cassia	16%	26%		11%	100%	6%	4%		11%	0%
Elmore	17%	23%	29%	12%	12%	6%	8%	0%	0%	0%
Fremont	20%	24%				7%	0%			
Jerome	20%	26%		0%	40%	8%	12%		0%	0%
Latah	16%	11%		40%	9%	5%	11%		20%	0%
Lincoln	17%	16%				7%	2%			
Madison	21%	9%			0%	7%	9%			0%
Minidoka	15%	23%		13%	0%	5%	7%		0%	0%
Payette	18%	33%		47%	100%	7%	10%		47%	100%
Teton	24%	18%				12%	0%			
Twin Falls	20%	20%		7%	23%	7%	0%		7%	23%
Nonmetro noncore										
Adams	24%	0%		57%		10%	0%		0%	
Bear Lake	15%	0%	0%			7%	0%	0%		
Benewah	20%	33%		12%	0%	8%	0%		9%	0%
Boundary	18%	0%		27%		8%	0%		27%	
Caribou	13%	27%				8%	0%			
Clark	24%	44%				8%	22%			
Clearwater	18%	22%		0%		6%	0%		0%	
Custer	19%	0%				4%	0%			
Gooding	17%	7%		0%		8%	3%		0%	
Idaho	25%	25%		25%	16%	9%	7%		5%	16%
Lemhi	26%	0%		0%		12%	0%		0%	
Lewis	19%	27%		32%		9%	27%		7%	
Oneida	24%	63%				12%	0%			
Power	20%	15%		0%		6%	6%		0%	
Shoshone	17%	16%		83%		6%	8%		33%	
Valley	31%	86%				11%	0%			
Washington	23%	13%		40%	0%	10%	13%		40%	0%
State of Idaho	20%	22%	30%	20%	23%	7%	7%	11%	12%	10%

Source: HUD AFFH CHAS data, 2017.

Compared to owners, renters in Idaho were much more likely to be cost burdened or severely cost burdened among all racial and ethnic groups. Native American and White renters were most likely to be cost burdened, with 46% of Native American renters and 41% of White renters experiencing cost burden and 20% in each group experiencing severe cost burden. Severe cost burden for Native American renters was especially comment in Gem County (100%), Shoshone County (56%), and Canyon County (54%). Severe cost burden was more common for White renters in Madison County (37%) and Latah County (31%).

Seventeen percent of Hispanic renters statewide experienced severe cost burden, with rates being especially high in Madison County (52%), Latah County (47%), and Blaine County (37%).

Sixteen percent of Black renters statewide experienced severe cost burden. Many of them were in Latah and Bannock counties, where rates of severe cost burden among Black renters were 67% and 50%, respectively.

Asian renters were least likely to experience cost burden, with just 12% statewide experiencing severe cost burden and 29% experiencing cost burden. However, severe cost burden among Asian renters was especially high in Madison County, where 80% were paying more than 50% of household income in gross rent.

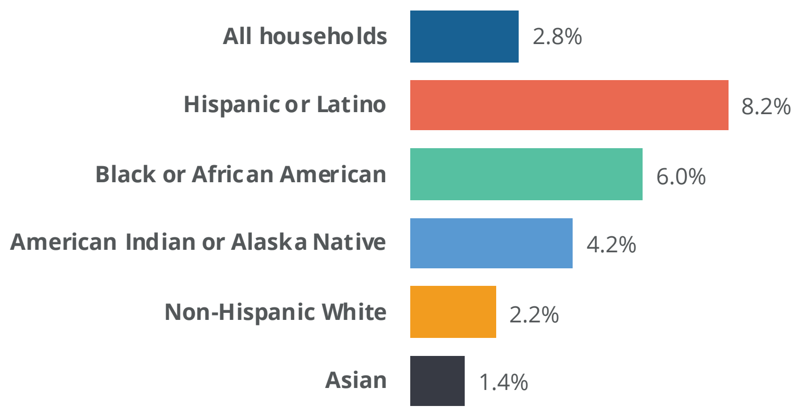
Figure III-4. Cost Burdened Renters by Race and County, 2017

	Cost Burdened Homeowners					Severely Cost Burdened Homeowners				
	Non-Hispanic White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Non-Hispanic White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian
Metro										
Ada	19%	17%	27%	27%	20%	7%	5%	3%	20%	7%
Bannock	15%	25%	63%	7%	32%	6%	13%	63%	3%	28%
Boise	21%	26%		0%	0%	11%	9%		0%	0%
Bonneville	15%	28%	0%	76%	27%	6%	8%	0%	52%	16%
Butte	21%	16%				11%	0%			
Canyon	21%	26%	17%	25%	31%	7%	9%	0%	20%	9%
Franklin	21%	11%	43%	7%		9%	0%	43%	7%	
Gem	25%	35%		22%		10%	0%		22%	
Jefferson	16%	37%		16%		5%	33%		16%	
Kootenai	23%	11%	100%	25%	31%	9%	7%	100%	22%	8%
Nez Perce	16%	23%	0%	6%	47%	4%	8%	0%	3%	27%
Owyhee	22%	26%		12%	40%	8%	12%		0%	0%
Nonmetro micropolitan										
Bingham	15%	13%		17%	33%	5%	5%		1%	0%
Blaine	28%	22%			4%	17%	11%			4%
Bonner	27%	11%		33%	22%	11%	0%		0%	22%
Camas	30%					20%				
Cassia	16%	26%		11%	100%	6%	4%		11%	0%
Elmore	17%	23%	29%	12%	12%	6%	8%	0%	0%	0%
Fremont	20%	24%				7%	0%			
Jerome	20%	26%		0%	40%	8%	12%		0%	0%
Latah	16%	11%		40%	9%	5%	11%		20%	0%
Lincoln	17%	16%				7%	2%			
Madison	21%	9%			0%	7%	9%			0%
Minidoka	15%	23%		13%	0%	5%	7%		0%	0%
Payette	18%	33%		47%	100%	7%	10%		47%	100%
Teton	24%	18%				12%	0%			
Twin Falls	20%	20%		7%	23%	7%	0%		7%	23%
Nonmetro noncore										
Adams	24%	0%		57%		10%	0%		0%	
Bear Lake	15%	0%	0%			7%	0%	0%		
Benewah	20%	33%		12%	0%	8%	0%		9%	0%
Boundary	18%	0%		27%		8%	0%		27%	
Caribou	13%	27%				8%	0%			
Clark	24%	44%				8%	22%			
Clearwater	18%	22%		0%		6%	0%		0%	
Custer	19%	0%				4%	0%			
Gooding	17%	7%		0%		8%	3%		0%	
Idaho	25%	25%		25%	16%	9%	7%		5%	16%
Lemhi	26%	0%		0%		12%	0%		0%	
Lewis	19%	27%		32%		9%	27%		7%	
Oneida	24%	63%				12%	0%			
Power	20%	15%		0%		6%	6%		0%	
Shoshone	17%	16%		83%		6%	8%		33%	
Valley	31%	86%				11%	0%			
Washington	23%	13%		40%	0%	10%	13%		40%	0%
State of Idaho	20%	22%	30%	20%	23%	7%	7%	11%	12%	10%

Source: HUD AFFH CHAS data, 2017.

Overcrowding. In addition to facing higher rates of cost burden, many Idahoans of color live in overcrowded housing at higher rates that White Idahoans. For example, 2.8 % of households in Idaho are considered overcrowded, but as indicated in Figure III-5, this rate is higher among Hispanic, Black, and Native American households in the state. An overcrowded household is defined as a housing unit with more than one person per room. Housing with multiple occupants per room can have a negative impact on mental health and can make it easier for diseases to spread.[1] Many households may be overcrowded because they have chosen to get smaller, more affordable homes or because they are doubling up with other families.

Figure III-5. Overcrowded Households by Race and Ethnicity, State of Idaho, 2019

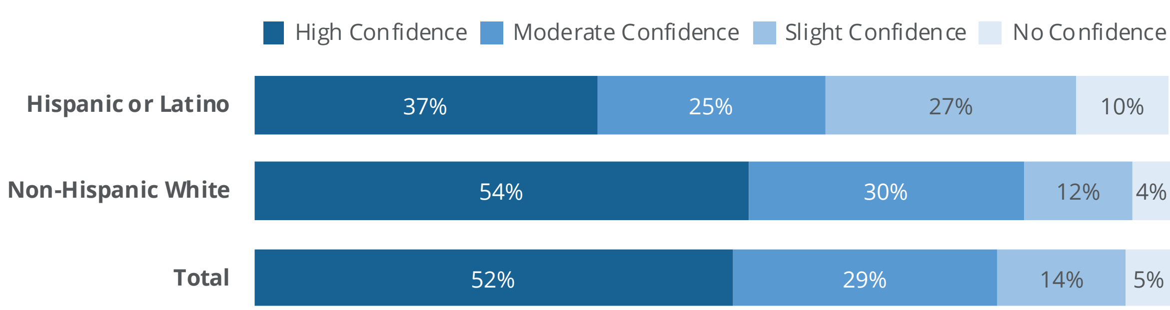


Source:

2019 5-year ACS and Root Policy Research

Inability to pay rent. June 2021 Pulse Survey from the Census provides current information on renters' confidence in their ability to pay next month's rent. These data indicate that Hispanic renters in Idaho had substantially less confidence in their ability to pay compared to White, non-Hispanic renters. As shown in Figure III-6, 28% of Hispanic renters said they had no confidence in their ability to pay next month's rent.

Figure III-6.
Confidence in Ability to Pay Next Month's Rent by Ethnicity, State of Idaho, 2021



Source: Pulse Survey, June 7, 2021.

[1] Maani, S., Vaithianathan, R., & Wolfe, B. (2006). *Inequality and health: Is housing crowding the link?* (No. 1124-2019-3324).

Higher likelihood of homelessness. The majority of individuals experiencing homelessness in Idaho are White. However, relative to their overall populations, people of color are often overrepresented in their experiences of homelessness. For instance, in Region 1, which includes Benewah, Bonner, Boundary, Kootenai, and Shoshone counties, 4% of the population identifies as Hispanic but 16% of people experiencing homelessness in Region 1 are Hispanic. However, Hispanic Idahoans are not overrepresented in homeless populations in every region. In Region 4, which includes Blaine, Camas, Cassia, Gooding, Jerome, Lincoln, Minidoka and Twin Falls counties, people of Hispanic origin make up 25% of the population on average but only 14% of the homeless population in Region 4 is Hispanic. Black Idahoans are overrepresented in homeless populations in every region in the state. Native Americans experiencing homelessness are overrepresented in Region 4 and in Region 7 (Ada County).

Figure III-7.
Populations Experiencing Homelessness by Race, State of Idaho, 2021

	Number of People Experiencing Homelessness	Regional Non-Hispanic White Population			Regional Hispanic or Latino Population			Regional Black or African American Population			Regional American Indian or Alaska Native Population		
		% of entire population	% of homeless population	Difference	% of entire population	% of homeless population	Difference	% of entire population	% of homeless population	Difference	% of entire population	% of homeless population	Difference
Region 1	148	93%	81%	-12%	4%	16%	12%	0%	1%	1%	3%	1%	-2%
Region 2	164	91%	36%	-55%	4%	0%	-4%	1%	2%	2%	4%	4%	-1%
Region 3	633	89%	36%	-53%	14%	12%	-2%	1%	0%	0%	1%	2%	1%
Region 4	230	94%	80%	-14%	25%	14%	-11%	0%	1%	1%	1%	4%	4%
Region 5	77	91%	69%	-22%	12%	13%	1%	0%	0%	0%	3%	2%	-1%
Region 6	62	93%	84%	-9%	14%	11%	-3%	0%	5%	5%	1%	5%	4%
Region 7 (Ada)	575	91%	85%	-5%	8%	9%	1%	1%	5%	4%	1%	3%	3%

Source: Point In Time Count, 2021 and 2019 5-year ACS estimates.

Differences in Homeownership by Race and Ethnicity

Nationwide, difference in homeownership rates contribute to the racial wealth gap.[2] This section illustrates differences in homeownership rates by race and ethnicity across Idaho. It also investigates differences in homeownership opportunities, namely mortgage denial rates and high-cost loan rates.

Homeownership rates. Statewide, 71% of White Idahoans own their homes, a much higher share than any other racial group. Black Idahoans are least likely to own their homes: just 38% of Black households own their homes. Close to half of Native American and Hispanic resident households own their homes: 56% and 53%, respectively. Sixty-three percent of Asian households are homeowners.

Figure III-8. Homeownership Rates by Race and Ethnicity, State of Idaho, 2019

Source: 2019 5-year ACS estimates.

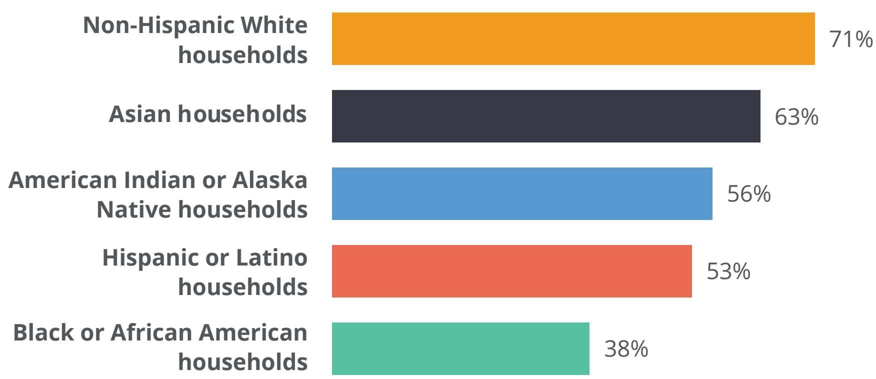


Figure III-9 shows the percent of homeowners in each race and ethnic group by county. Counties with less than 100 households of color are excluded from the table. Hispanic residents in Boise (97%), Fremont (77%), Bingham (71%), and Boundary (71%) counties are more likely to own their homes compared to those of the same ethnicity in other counties. Hispanic households are least likely to own their homes in Latah (22%) and Madison (24%) counties. Native American residents are most likely own their homes in Power (97%) and Jefferson (96%) counties and less likely in Twin Falls (40%), Shoshone (44%), Ada (47%) and Kootenai (48%) counties. Among Asian residents, only 13% living in Latah County own their homes. On the other end of the spectrum, 83% of Asian residents in Payette County own their homes. Lastly, Black homeowners are more common in Kootenai County where 60% of Black households own their homes, but the ACS estimates that none of the Black households in Twin Falls or Latah counties own their homes.

[2] Hamilton, Darrick, and William A. Darity. "The political economy of education, financial literacy, and the racial wealth gap." (2017): 59-76.

Figure III-9. Percent Homeowners by Race/Ethnicity and by County, 2019

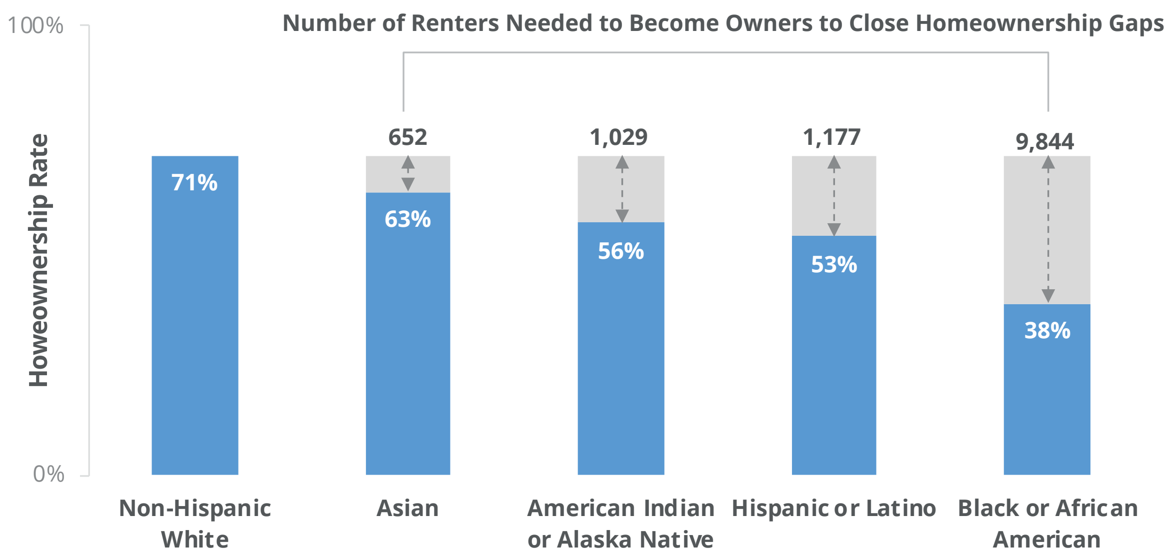
Source:

Source: 2019 5-year ACS estimates.

	Homeowners by Race/Ethnicity				
	Non-Hispanic White	Hispanic or Latino	American Indian or Alaska Native	Asian	Black or African American
Metro					
Ada	70%	46%	47%	72%	42%
Bannock	70%	40%	54%	39%	41%
Boise	83%	97%			
Bonneville	72%	55%	56%	55%	22%
Canyon	71%	57%	61%	71%	45%
Franklin	83%	44%			
Gem	75%	76%	74%		
Jefferson	82%	65%	96%		
Kootenai	71%	47%	48%	59%	60%
Nez Perce	74%	63%	55%		
Owyhee	75%	52%	67%		
Nonmetro micropolitan					
Bingham	79%	71%	60%		
Blaine	72%	43%			
Bonner	76%	54%			
Cassia	71%	54%	50%		
Elmore	63%	51%	72%	27%	34%
Fremont	82%	77%			
Jerome	65%	47%			
Latah	57%	22%		13%	0%
Lincoln	69%	49%			
Madison	46%	24%		36%	
Minidoka	74%	64%	60%		
Payette	74%	64%	58%	83%	
Teton	80%	54%			
Twin Falls	70%	55%	40%	58%	0%
Nonmetro noncore					
Benewah	74%		57%		
Boundary	78%	71%			
Caribou	82%	56%			
Clark	63%	50%			
Gooding	70%	60%			
Idaho	78%	38%	53%		
Power	73%	54%	97%		
Shoshone	71%	64%	44%		
Washington	75%	50%			
State of Idaho	71%	53%	56%	63%	38%

In order to close the gaps between White homeownership rates and homeownership rates of people of color, many more Hispanic, Black, Native American, and Asian households would need to own homes. For example, statewide, 1,029 Black households would need to go from renters to owners in order to also have a homeownership rate similar to White Idahoans (71%). Similarly, 1,177 Native American households, 652 Asian households, and 9,844 Hispanic households would need to become homeowners instead of renters to close the gap.

Figure III-10.
To Close the Gaps between Non-Hispanic White Homeownership Rates and Homeownership Rates of People of Color..., State of Idaho, 2019



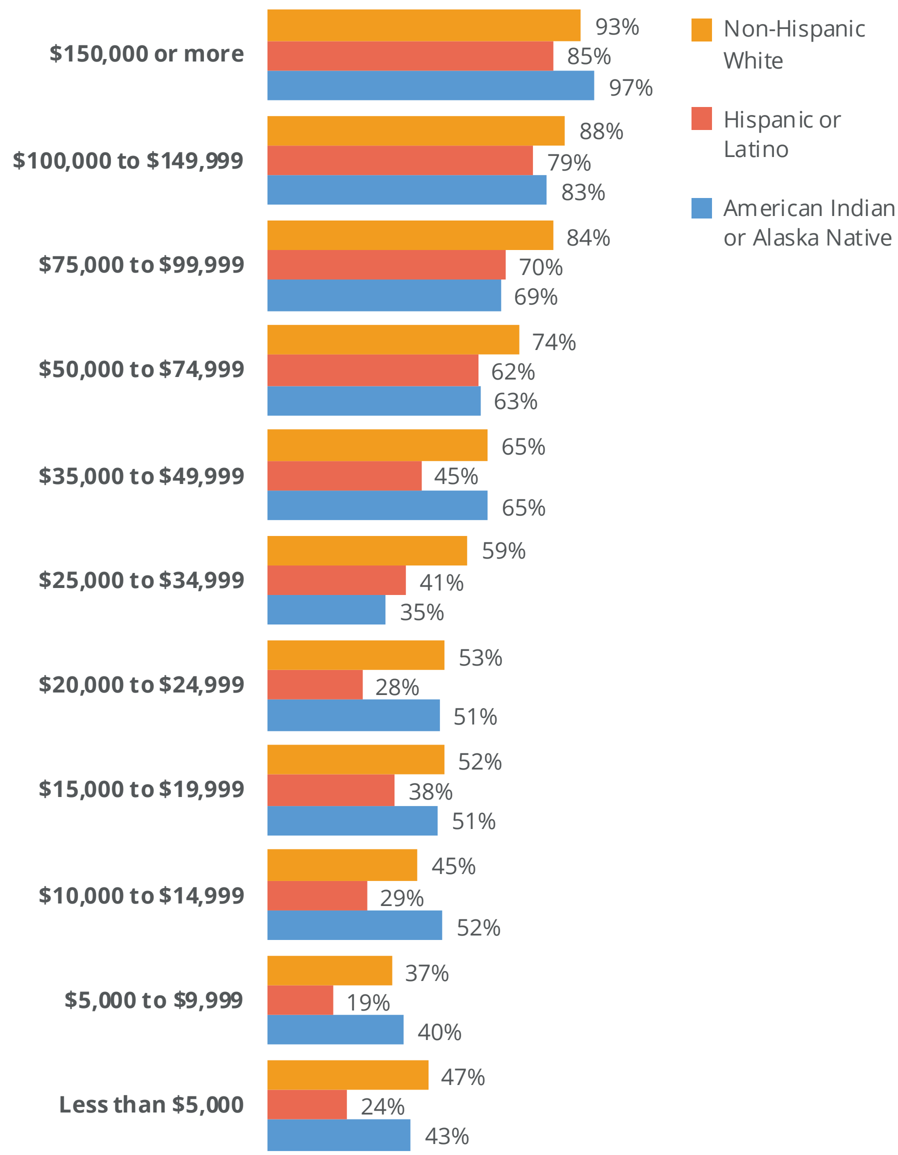
Source: 2019 5-year ACS PUMS data and Root Policy Research.

Note, however, that the above gaps analysis does not account for differences in income by race and ethnicity. Figure III-11 illustrates statewide homeownership rates among White, Hispanic, and Native American populations with varying levels of household income. Note that the sample sizes of Black and Asian households were too small to separate the data by income range.

Figure III-11. Percent Homeowners by Income Race and Ethnicity, State of Idaho, 2019

Source:

2019 5-year ACS PUMS data and Root Policy Research.



At every income level, White households have higher homeownership rates than Hispanic households. The gap between White and Hispanic homeownership rates is widest for households earning $20,000 to $24,999 per year: 59% of White households in this group own their homes as opposed to just 28% of Hispanic households in the same income bracket, leaving a 25 percentage-point gap. Similarly, there is a 24 percentage-point gap in homeownership between White and Hispanic households earning less than $5,000 in annual household income: 47% of White households in this group own their homes as opposed to 24% of Hispanic households. It is worth noting that even in the highest income bracket, households making $150,000 or more, 93% of White households own their homes as opposed to 85% of Hispanic households.

Comparing Native American households to White households shows a similar trend. White households own their homes at higher rates in most income groups, but not all. The gap is widest for households earning between $25,000 and $34,999, where only 35% of Native Americans in this income bracket own their home as opposed to 59% of White households in this income bracket.

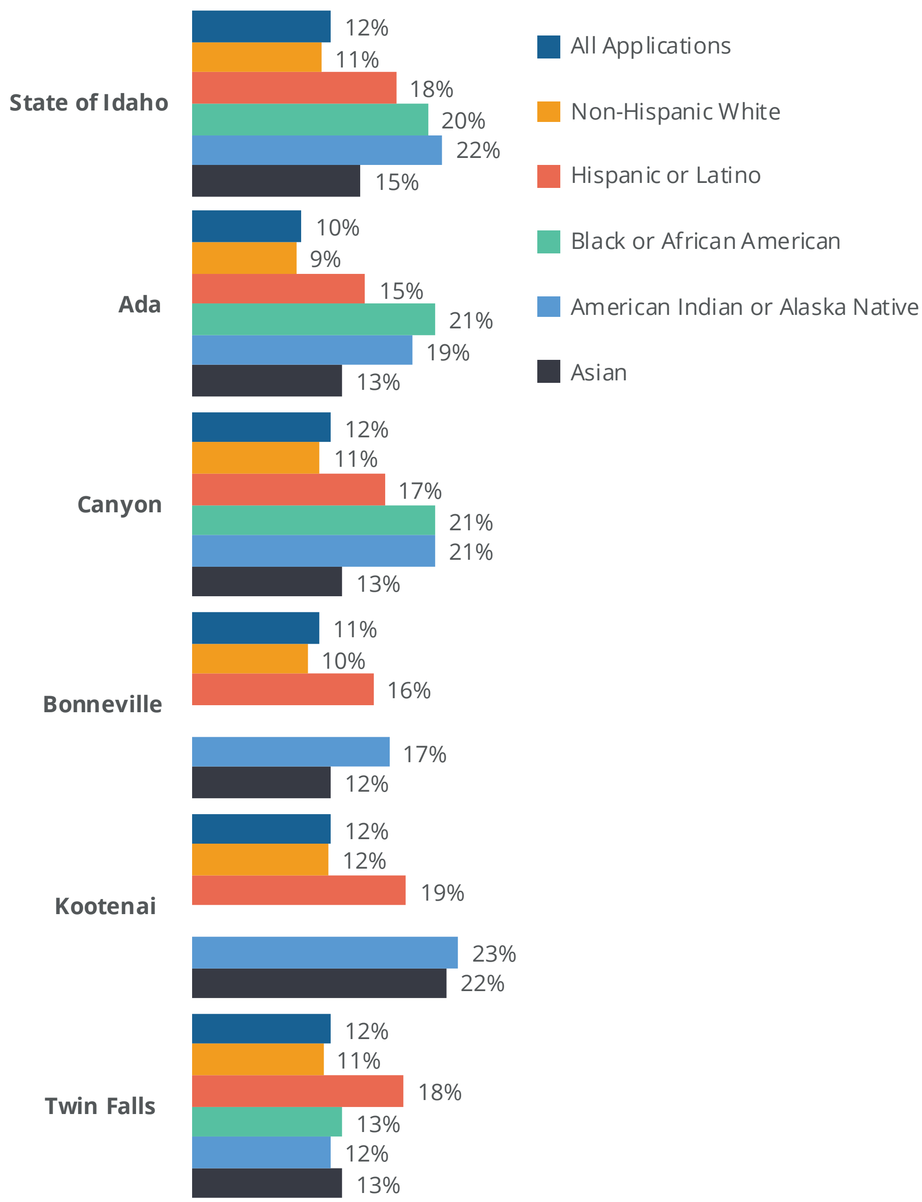
Disparities in mortgage denial rates. In Idaho overall, Hispanic mortgage applicants are denied loans at higher rates than White applicants: in 2020, 18% of loan applications made by a Hispanic household were denied as compared to 12% of White applicants. Similarly, Black or African American applicants were denied loans at a rate over 20%, as were Native Hawaiian or Pacific Islanders and Native Americans. Asian applicants were denied loans at a lower rate of 15%.

Figure III-12 below displays denial rates by race and ethnicity for regions with high numbers of applications from people of color. Data for counties where there were less than 30 applicants of a certain race or ethnic group are not included. Data representing each of the available race and ethnic groups are described below:

- **Hispanic applicants:** Ada County (1,464), Canyon County (2,156), Bonneville County (511), and Twin Falls County (546) each had more than 500 Hispanic home loan applicants. Ada (15%), Bonneville (16%), Canyon (17%) Twin Falls (18%) had higher rejection rates for Hispanic applicants compared White applicants.
- **Black applicants:** Counties with the most Black or African American mortgage applicants were Ada (256), Canyon (91), Twin Falls (30), and Elmore (29) counties. Each had higher rejection rates for Black applicants compared to White: Black rejection rates were 21% in Ada and Canyon counties, 14% in Elmore County, and 13% in Twin Falls. White rejection rates for Ada (9%), Canyon (12%), Twin Falls (12%), and Elmore (10%) where substantially lower, with the biggest gap between White and Black rejection rates in Ada County and the smallest in Twin Falls.
- **Asian applicants:** Ada (1,023) and Canyon (190) counties had the most Asian mortgage applicants, followed by Kootenai County (100). Kootenai County had the highest rejection rate of Asian applicants at 22%. Ada and Canyon counties had lower rejection rates, both around 13% for Asian applicants. Among these, the biggest gap in rejection rates between White and Asian applicants was in Kootenai county, where only 12% of White mortgage applicants were rejected.
- **Native American applicants:** Counties with the most Native American applicants were Ada (155, 19%), Canyon (140, 21%), and Kootenai (86, 23%). Again, Kootenai had the highest rejection rate for Native Americans at 23%, followed by Canyon County at 21% and Ada County 19% denial rates.

Figure III-12. Mortgage Loan Denial Rates by Race and Ethnicity, State of Idaho and Select Counties, 2020

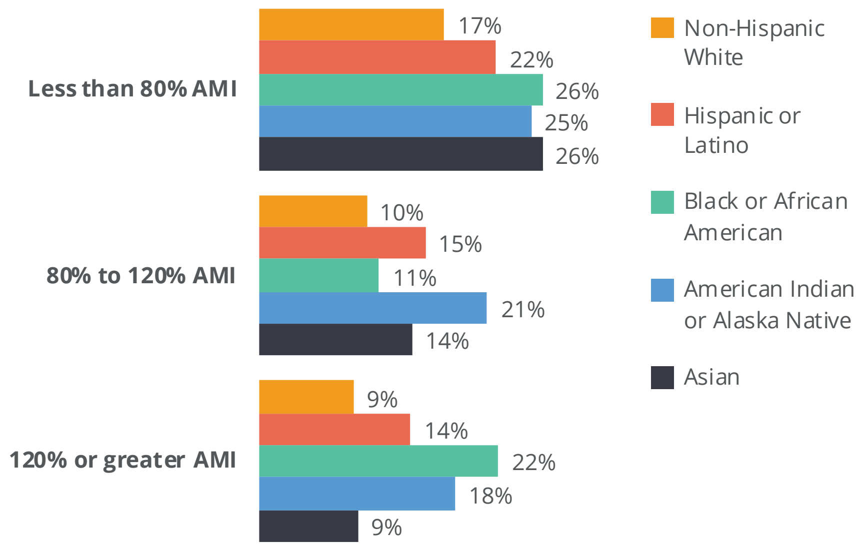
Source:
2020 HMDA data.



It is important to note that these figures do not account for differences in income. A narrowing of the disparities in loan approvals should occur when income is considered. Figure III-13 shows state-wide loan denials by ethnicity and income range.

Figure III-13. Denial Rates by Income, State of Idaho, 2020

Source: 2020 HMDA data.



HMDA data provide reasons for loan denials, which are summarized in the table below. The green boxes signify the top three reasons for denial of mortgage loan credit. African American/Black applicants are much more likely than other borrowers to be denied loans due to a poor credit history. Asian applicants are more likely than others to be denied loans due to high debt-to-income ratios. Overall, the most common reasons for loan denials are credit history and debt-to-income ratios.

Figure III-14. Reasons for Denial by Race/Ethnicity, State of Idaho, 2020

	Percent of all Reasons by Race/Ethnicity				
Reason for Denial	Non-Hispanic White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian
Debt-to-income ratio	31%	36%	39%	25%	42%
Credit history	25%	32%	17%	31%	18%
Collateral	16%	11%	12%	14%	10%
Other	11%	9%	12%	10%	14%
Credit application incomeplete	10%	6%	13%	10%	9%
Unverifiable information	4%	4%	1%	6%	4%
Employment history	2%	2%	3%	3%	3%
Insufficient cash (downpayment, closing costs, etc.)	1%	1%	4%	1%	1%
Mortgage insurance denied	0%	0%	0%	0%	0%
Total	100%	100%	100%	100%	100%

Note: Does not include loans for multifamily properties or non-owner occupants. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness. Green box signifies the top three reasons. Total reasons provided exceed the total number of denials as multiple reasons may be given for each denial.

Source: 2020 HMDA data and Root Policy Research.

Many of these trends may be related to banked status. Studies have shown that nationwide, people of color are more likely to be underbanked or unbanked compared to White individuals.[3] In fact, according to FDIC data, 4% of all households in Idaho were unbanked in 2019, meaning they do not own a transaction account at an insured depository institution. However, 11% of Hispanic Idahoan households were unbanked as compared to just 2% of White Idahoan households. Only 1% of homeowners were unbanked compared to over 8 %of non-homeowners in the state. Having a bank account or banking relationship facilitates households' access to affordable credit and therefore homeownership and wealth building.

- **High-priced loans.** Of the Black, Native American, and Hispanic households who did obtain mortgages in 2020 in Idaho, many obtained high-priced loans. For the purpose of this section, we define loans as "high priced" if the APR exceeded the average prime offer rate (APOR) for loans of a similar type by at least 1.5 percentage points for first-lien loans.

- In 2020, 6% of mortgage loans made in Idaho were considered high-priced loans. However, 11% of Hispanic borrowers received high-priced loans, as did 9% of African American/Black and 8% Native American borrowers. Just 6% of White borrowers and 3% of Asian borrowers received high priced loans.

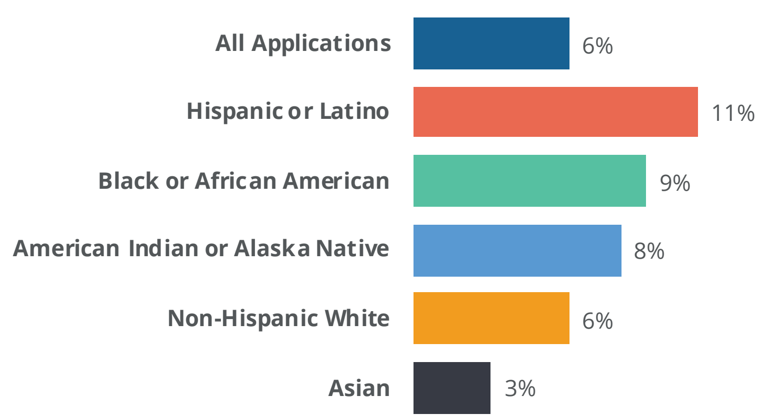
Figure III-15. Higher Priced Loans by Race/Ethnicity, State of Idaho, 2020

Note:

Does not include loans for multifamily properties or non-owner occupants. Loans were classified as higher-priced if the APR exceeded the average prime offer rate (APOR) for loans of a similar type by at least 1.5 percentage points for first-lien loans.

Source:

2020 HMDA data. and Root Policy Research.



Housing Disparities for Idahoans with Disabilities

With a growing number of Idahoans experiencing disabling conditions, accessible housing in the state is vital. This section provides detail on households with disabilities, including homeownership rates, housing problems, and availability of accessible housing.

[3] Long, M. G. (2020). Informal Borrowers and Financial Exclusion: The Invisible Unbanked at the Intersections of Race and Gender. The Review of Black Political Economy, 47(4), 363-403

An overview of Idahoans with disabilities. Figures III-16 and III-17 illustrate the number of individuals with disabilities in Idaho overall and in each county according to 5-year 2019 ACS data. Overall, 14% of Idahoans have a disability. There are high proportions of people with disabilities living in Shoshone County (27%), Custer County (26%), and Idaho County (23%).

Figure III-16. Percent of Population with a Disability by County, 2019

Source:

2019 5-year ACS estimates and Root Policy Research.

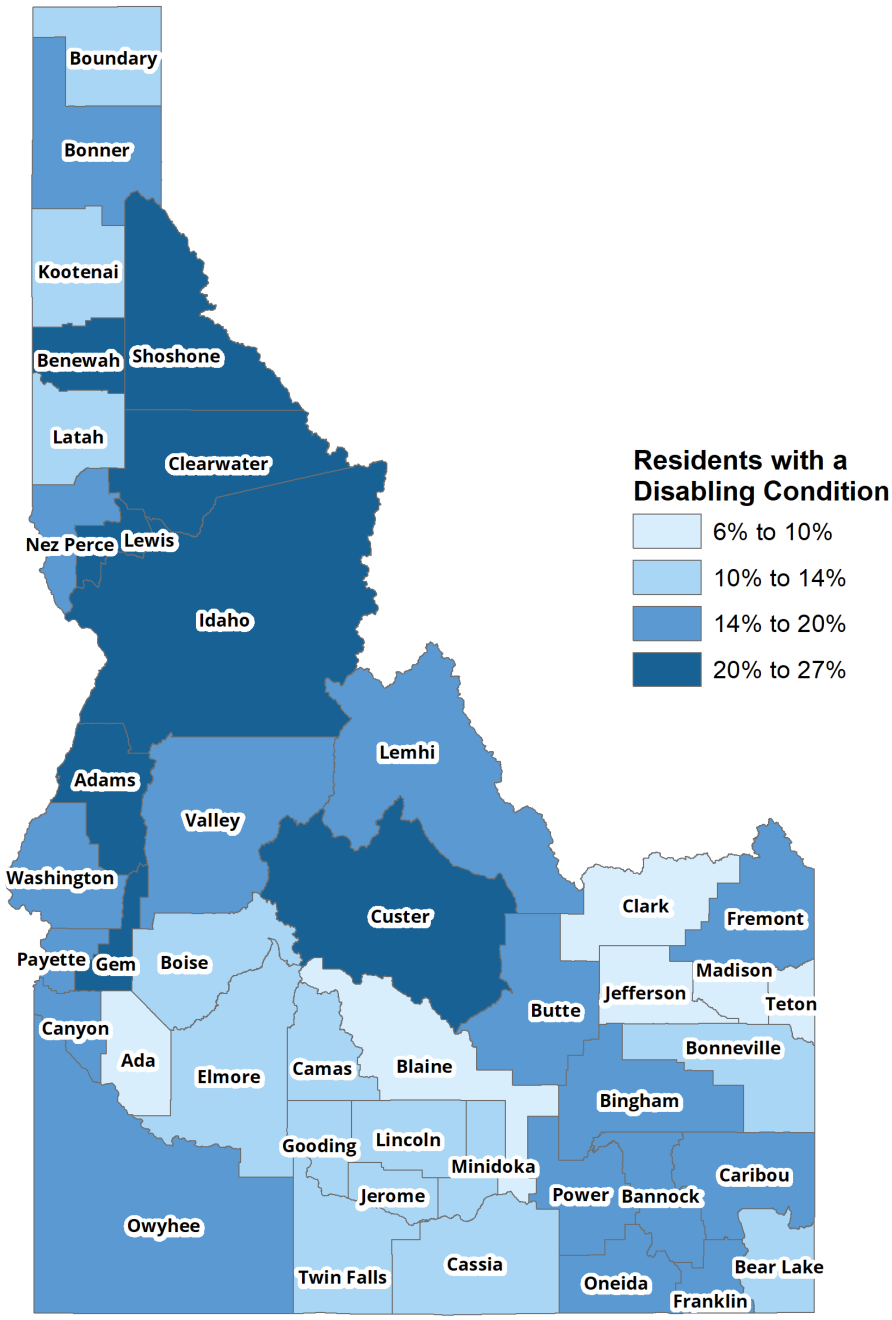


Figure III-17. Population with Disabilities by Type and by County, 2019

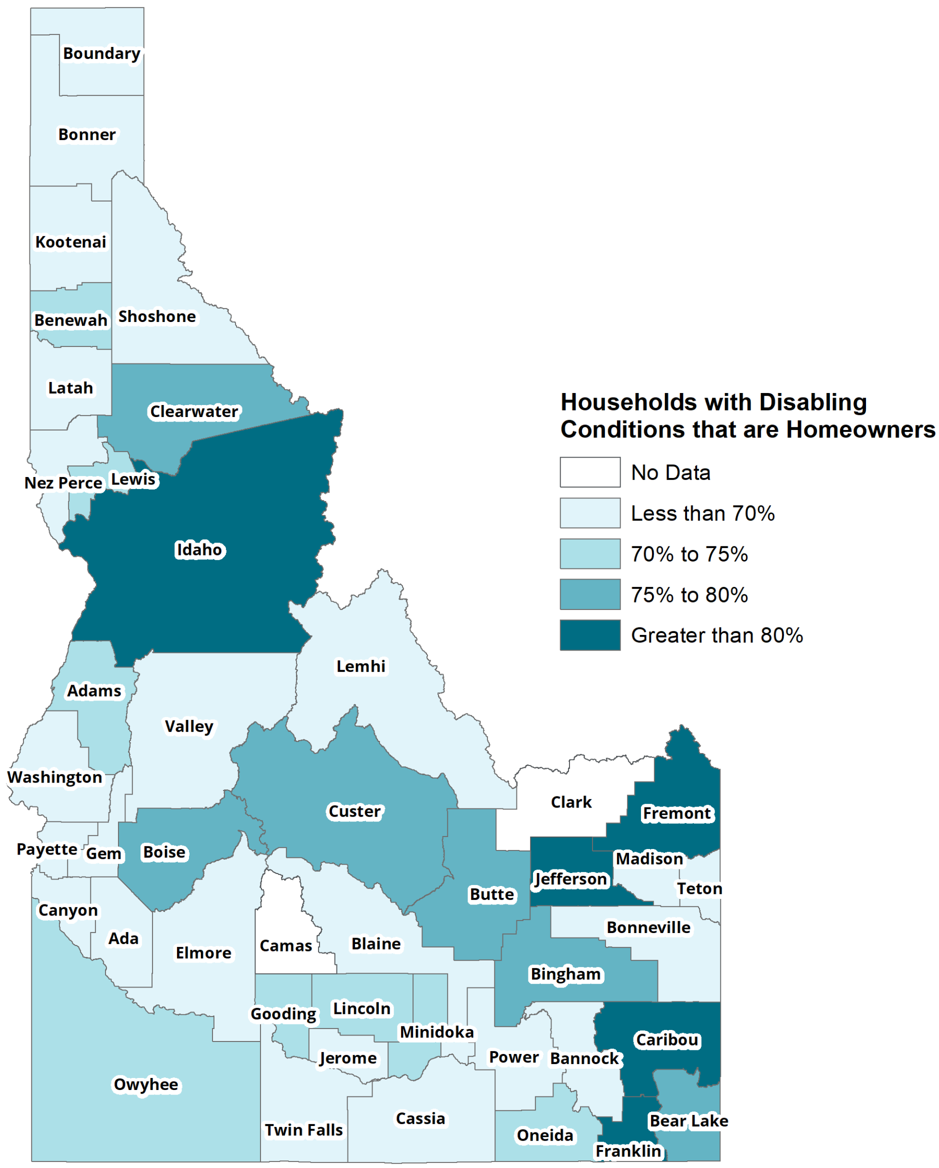
	Number of people with a disability	Percent of population with a disability	Number of People by Type of Disability			
			Vision difficulty	Hearing difficulty	Cognitive difficulty	Ambulatory difficulty
Metro						
Ada	46,071	10%	8,253	15,363	18,617	19,893
Bannock	13,458	16%	2,651	4,078	6,209	5,684
Boise	1,017	14%	227	436	386	493
Bonneville	16,291	14%	3,627	4,944	7,353	6,855
Butte	397	16%	81	177	134	169
Canyon	31,606	15%	5,341	9,828	13,618	13,947
Franklin	2,093	16%	316	739	884	892
Gem	3,554	21%	581	1,145	1,421	1,952
Kootenai	21,273	14%	2,899	8,298	7,248	9,499
Nez Perce	6,804	17%	1,151	2,233	2,394	3,408
Owyhee	2,047	18%	546	720	555	919
Nonmetro micropolitan						
Bingham	7,216	16%	1,386	2,528	2,871	3,591
Blaine	2,254	10%	337	1,083	589	989
Bonner	7,139	16%	980	2,436	2,638	3,532
Camas	117	11%	12	61	12	56
Cassia	3,278	14%	595	1,165	1,032	1,695
Elmore	3,405	14%	657	1,259	1,159	1,466
Fremont	1,824	15%	202	607	632	760
Jerome	2,607	11%	285	980	934	1,232
Latah	4,840	12%	753	1,487	2,093	1,662
Lincoln	745	14%	188	269	244	370
Madison	3,283	8%	630	795	1,366	1,144
Minidoka	2,991	14%	497	1,102	995	1,326
Payette	3,938	17%	872	1,369	1,265	1,671
Teton	680	6%	118	385	166	239
Twin Falls	11,501	14%	1,966	3,308	4,470	5,882
Nonmetro noncore						
Adams	858	21%	176	375	305	413
Bear Lake	847	14%	186	289	293	398
Benewah	2,000	22%	473	656	742	973
Boundary	1,629	14%	252	431	761	823
Caribou	1,003	15%	130	294	361	482
Clark	54	6%	11	19	11	31
Clearwater	1,645	21%	221	721	477	823
Custer	1,076	26%	436	439	277	736
Gooding	1,951	13%	485	590	750	1,059
Idaho	3,678	23%	690	1,742	1,081	1,849
Jefferson	2,928	10%	683	1,108	1,027	1,058
Lemhi	1,422	18%	235	669	504	749
Lewis	981	26%	234	418	356	521
Oneida	783	18%	106	214	356	480
Power	1,367	18%	278	554	447	730
Shoshone	3,358	27%	539	1,217	1,419	1,735
Valley	1,666	16%	240	783	418	851
Washington	1,994	20%	467	823	687	959
State of Idaho	**229,669**	**14%**	**40,993**	**78,137**	**89,557**	**103,996**

Source: U.S. Census Bureau 2019 5-year ACS estimates.

Homeownership among Idahoans with disabilities. Households which include a person with a disability are slightly less likely to own their home than households with no disabilities. Seventy percent of Idahoan households own their home while 68% of households including a person with a disability own their home.[4] However, in some regions of the state, there are more homeowners among households with disabilities. Figure III-18 illustrates county-level homeownership among people with disabilities. Note that data are limited in Camas and Clark counties, so they are excluded from the figure. Jefferson and Fremont counties have the highest percentage of homeownership among households with disabilities, with 86% and 84% respectively. Blaine (60%) and Madison (63%) counties have the lowest.

Figure III-18. Percent of Households with Disabilities who Own their Homes by County, 2017

Source:
2017 HUD CHAS data.



[4] According to 2017 HUD CHAS data. Here we categorize a person with a disability as one with either a cognitive, ambulatory, visual or hearing impairment.

According to FDIC data, individuals with a disability are substantially more likely to be unbanked: 10% of individuals with a disability in Idaho were unbanked compared to 4% of the overall population. Individuals that do not own a transaction account at an insured depository institution have a more difficult time building credit and this purchasing a home.

Disparities in those experiencing housing problems. According to HUD CHAS data (from 2017 5-year ACS), Idahoans with disabilities are more likely to live in a home with at least one of the four key housing problems identified by HUD: (1) housing unit lacks complete kitchen facilities, (2) housing unit lacks complete plumbing facilities, (3) household is overcrowded, or (4) household is cost burdened. Overall, 24% of Idahoans who do not have a cognitive, ambulatory, vision or hearing disability live in a home with one or more of these four problems. However, Idahoans with disabilities face these issues more frequently: 40% of individuals with a cognitive impairment, 36% of individuals with an ambulatory impairment, and 29% of individuals with a hearing or vision impairment living in a home with at least one of these issues.

Figure III-19.
Percent of Households Experiencing Major Housing Problems, by Disability Status, State of Idaho, 2017

Notes: Major housing problems include (1) housing unit lacks complete kitchen facilities, (2) housing unit lacks complete plumbing facilities, (3) household is overcrowded, or (4) household is cost burdened.

Source:

2017 HUD CHAS data.

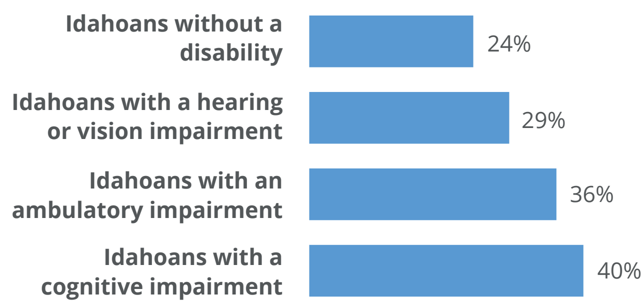


Figure III-20 illustrates the proportion of individuals with and without disabilities in each county living in a home with one or more of these four problems. Individuals with hearing or vision impairments are experiencing housing problems at especially high rates in Idaho and Clark counties, where 41% and 42% of those with hearing or vision impairments, respectively, are living with at least one major housing problem. Those with ambulatory disabilities are experiencing housing problems at high rates in Camas County (56%) and Adams County (52%), while those with cognitive disabilities are experiencing housing problems at especially high rates in Washington County (54%) as well as Camas County (50%).

Figure III-20. Households Experiencing Major Housing Problems, by Disability Status and County, 2017

	Percent of Individuals Living with a Housing Problem			
	Without Disabilities	With a Hearing or Vision Disability	With an Ambulatory Disability	With a Cognitive Disability
Metro				
Ada	26%	30%	39%	44%
Bannock	25%	27%	31%	36%
Boise	24%	27%	30%	35%
Bonneville	22%	28%	41%	40%
Butte	19%	19%	38%	48%
Canyon	28%	34%	39%	42%
Franklin	30%	19%	21%	19%
Gem	26%	28%	41%	48%
Kootenai	27%	27%	42%	48%
Nez Perce	22%	26%	36%	42%
Owyhee	29%	29%	45%	41%
Nonmetro micropolitan				
Bingham	19%	28%	27%	31%
Blaine	33%	12%	31%	48%
Bonner	32%	37%	38%	45%
Camas	35%	29%	56%	50%
Cassia	23%	33%	23%	29%
Elmore	27%	30%	32%	43%
Fremont	26%	26%	20%	27%
Jerome	30%	27%	33%	35%
Latah	34%	35%	30%	37%
Lincoln	24%	35%	24%	24%
Madison	51%	35%	49%	40%
Minidoka	19%	24%	25%	27%
Payette	27%	29%	34%	28%
Teton	26%	16%	35%	35%
Twin Falls	27%	33%	35%	39%
Nonmetro noncore				
Adams	26%	37%	52%	48%
Bear Lake	18%	14%	27%	25%
Benewah	22%	34%	36%	39%
Boundary	19%	32%	37%	28%
Caribou	15%	19%	21%	32%
Clark	33%	42%	13%	11%
Clearwater	22%	22%	26%	32%
Custer	28%	18%	16%	25%
Gooding	25%	34%	32%	39%
Idaho	24%	41%	42%	41%
Jefferson	23%	19%	22%	24%
Lemhi	30%	27%	34%	44%
Oneida	26%	39%	28%	29%
Power	22%	5%	10%	23%
Shoshone	21%	30%	34%	37%
Valley	39%	32%	39%	47%
Washington	25%	32%	49%	54%
State of Idaho	27%	29%	36%	40%

Source: 2017 CHAS data.

The likelihood of experiencing one of the four major housing problems is higher among renters than among homeowners, and this gap is especially pronounced among individuals with disabilities. Statewide, 20% of homeowners without a disability are experiencing a housing problem compared to 41% of renters.

However, among Idahoans with a hearing or vision impairment, 22% of homeowners and 51% of renters are experiencing a problem. Among Idahoans with ambulatory disabilities, 27% of homeowners have a housing problem compared to 55% of renters. Lastly, 28% of homeowners with a cognitive disability are experiencing housing problems compared to 58% of renters with a cognitive disability. A county-level breakdown is available in Figure III-21. Note that counties with less than 15 renters or homeowners with a particular disability are excluded from the table.

Figure III-21.
Households Experiencing Major Housing Problems, by Tenure and Disability Status, State of Idaho, 2017

Source:
2017 CHAS data.

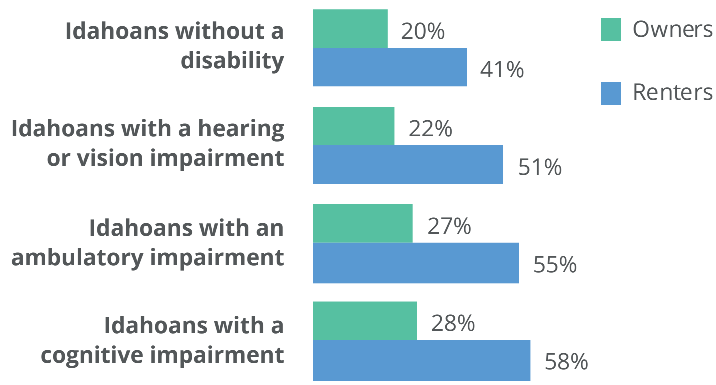


Figure III-22. Renters and Homeowners Experiencing Major Housing Problems, by Disability Status and County, 2017

Category	Renters				Owners			
	No Disability	Hearing or Vision Disability	Ambulatory Disability	Cognitive Disability	No Disability	Hearing or Vision Disability	Ambulatory Disability	Cognitive Disability
Metro								
Ada	41%	56%	60%	65%	19%	20%	27%	26%
Bannock	40%	62%	56%	53%	18%	15%	19%	24%
Boise	29%	26%	30%	22%	23%	27%	30%	40%
Bonneville	36%	53%	70%	61%	16%	19%	23%	23%
Butte	22%	16%	29%	50%	19%	19%	41%	47%
Canyon	40%	57%	59%	60%	22%	25%	30%	29%
Franklin	39%	36%	30%	33%	28%	17%	18%	15%
Gem	23%	32%	61%	62%	27%	26%	32%	40%
Kootenai	39%	43%	66%	62%	22%	22%	30%	39%
Nez Perce	42%	40%	48%	60%	14%	22%	30%	28%
Owyhee	34%	48%	59%	53%	27%	22%	39%	34%
Nonmetro micropolitan								
Bingham	33%	56%	40%	50%	15%	23%	23%	22%
Blaine	41%	12%	28%	46%	29%	13%	33%	51%
Bonner	41%	58%	54%	65%	29%	30%	31%	33%
Camas	31%			67%	36%			33%
Cassia	30%	49%	37%	41%	20%	27%	17%	17%
Elmore	37%	47%	35%	64%	18%	20%	30%	31%
Fremont	38%	50%	39%	45%	22%	22%	17%	22%
Jerome	43%	48%	53%	43%	22%	19%	27%	30%
Latah	52%	65%	41%	50%	17%	22%	24%	27%
Lincoln	33%	41%	33%	45%	19%	33%	20%	17%
Madison	72%	74%	77%	51%	25%	17%	32%	30%
Minidoka	27%	21%	40%	29%	16%	25%	21%	25%
Payette	39%	43%	59%	40%	23%	22%	23%	23%
Teton	36%	16%	18%	11%	23%	16%	55%	43%
Twin Falls	41%	53%	47%	52%	20%	22%	29%	30%
Nonmetro noncore								
Adams	28%	90%	65%	75%	25%	26%	45%	37%
Bear Lake	25%	44%	58%	50%	16%	9%	20%	12%
Benewah	36%	46%	41%	55%	18%	31%	34%	29%
Boundary	21%	48%	57%	39%	19%	28%	26%	23%
Caribou	21%	57%	31%	37%	14%	15%	19%	29%
Clark	35%				32%			
Clearwater	43%	42%	34%	42%	15%	18%	25%	27%
Custer	31%	52%	22%	58%	27%	9%	15%	8%
Gooding	39%	49%	40%	50%	18%	28%	29%	36%
Idaho	30%	35%	36%	51%	22%	42%	43%	37%
Jefferson	36%	33%	31%	36%	20%	17%	21%	22%
Lemhi	41%	32%	35%	36%	26%	25%	34%	48%
Lewis	30%	44%	59%	41%	24%	13%	22%	18%
Oneida	15%	54%	29%	27%	29%	36%	27%	30%
Power	23%	0%	2%	33%	22%	8%	16%	19%
Shoshone	29%	58%	61%	67%	18%	18%	22%	20%
Valley	59%	43%	45%	50%	34%	28%	36%	46%
Washington	43%	53%	79%	76%	20%	24%	35%	39%
State of Idaho	41%	51%	55%	58%	20%	22%	27%	28%

Source: 2017 CHAS data.

Accessibility Challenges

Accessibility requirements in housing. The Fair Housing Act of 1991 introduced accessibility rules for new housing developments. Newly developed affordable housing is required to make 5% of units accessible. Newly developed market rate housing is required to make 2% accessible. There are two types of accessible units.

- **Type A is fully accessible.** This includes access to site and common areas; access to units; wheelchair accessible kitchens; bathrooms, doors, closets; and accessible appliances in a range of unit types.

- **Type B is adaptable.** This includes access to site and common areas; access to units on the ground floor if there is no elevator or to all units if there is an elevator; use of at least one bathroom in the type B units.

More details on these requirements can be found on the Americans with Disabilities Act website.

Accessible housing stock. According to 2019 5-year ACS data, the majority (53%) of Idaho's housing stock, or 307,940 homes, were built before accessibility requirements were put in place by the Fair Housing Act in 1991. This means that many homes in the state will not be accessible to individuals with disabilities. Counties with the highest proportions of their housing stock built before 1991 were Shoshone County (85%), Lewis County (83%), Power County (81%), and Butte County (80%). On the other end of the spectrum, over half of the homes in Valley, Kootenai, Canyon, Ada, Madison, and Teton counties were built after the Fair Housing Act and are therefore more likely to have accessible housing.

Figure III-23 provides an estimate of the number of accessible homes in each county. The Fair Housing Act required 2% of newly developed market rate housing be accessible. For this reason, the estimated number of accessible homes in Figure III-23 is calculated as 2% of all du-/tri-/fourplexes and multifamily units/apartments built after 1990. Because some developments may have been retrofitted and because some single-family homes may also be accessible, these figures are likely underestimates. However, research from the Furman Institute estimate that less than one percent of homes nationwide are wheelchair accessible and nearly 4% are "livable" for individuals with mobility difficulties (meaning the home has a stepless entry, entry-level or elevator accessible bathroom and bedrooms, no steps between rooms, and accessible bathrooms with grab bars).[5]

Figure III-23 also indicates the number of people with an ambulatory difficulty in each county. Note that this is also an underestimate of individuals needing accessible housing:

[5] Bo'sher, Luke, et al. "Accessibility of America's Housing Stock: Analysis of the 2011 American Housing Survey (AHS)." *Available at SSRN 3055191* (2015).

these data do not include individuals with other disabilities (for instance, hearing, vision, or cognitive difficulties), nor do they include elderly individuals may require accessible housing soon. By subtracting the estimated number of accessible housing units from the number of people with ambulatory disabilities, we calculate gaps in accessible housing needs (column 3). Columns 4, 5, and 6 also include percentage estimates by county.

- For the state overall, there is an estimated 102,959 missing accessible housing units for people with ambulatory difficulties, which equates to 5.99 percentage-point gap.
- Nearly 17.73% of Custer County's population have an ambulatory difficulty but only 0.02% of their housing stock is estimated accessible housing, meaning they have a 17.71 percentage-point gap in accessible housing.
- Madison, Teton, and Clark counties had the lowest percentage-point gaps in accessible housing. This is driven both by the counties' having a greater proportion of newer, multifamily housing units and by the counties' having a low proportion of individuals with ambulatory disabilities.
- Custer, Shoshone, Lewis, Idaho, and Gem counties have the largest percentage-point gaps in accessible housing. All five counties have populations where more than 11% have an ambulatory disability and have less than 0.1% of estimated accessible housing stock.
- However, in terms of the number of accessible homes missing, Ada, Canyon, and Kootenai counties have the largest gaps, each with over 10,000 missing units.

Figure III-23. Gaps in Accessible Housing by County, 2019

	Number			Percent		
	People with Ambulatory Disability	Estimated Accessible Homes	Accesible Housing Gap	Population with Ambulatory Disability	Accessible Housing Units	Percentage Point Gap
Metro						
Ada	19,893	338	19,555	4.43%	0.19%	4.24
Bannock	5,684	40	5,644	6.71%	0.12%	6.59
Boise	493	1	492	6.71%	0.01%	6.70
Bonneville	6,855	65	6,790	6.05%	0.15%	5.90
Butte	169	0	169	6.66%	0.01%	6.65
Canyon	13,947	90	13,857	6.45%	0.12%	6.33
Franklin	892	3	889	6.65%	0.07%	6.58
Gem	1,952	6	1,946	11.35%	0.09%	11.26
Kootenai	9,499	134	9,365	6.09%	0.19%	5.90
Nez Perce	3,408	16	3,392	8.60%	0.09%	8.51
Owyhee	919	1	918	8.03%	0.02%	8.01
Nonmetro micropolitan						
Bingham	3,591	10	3,581	7.88%	0.06%	7.82
Blaine	989	27	962	4.43%	0.17%	4.25
Bonner	3,532	23	3,509	8.15%	0.09%	8.06
Camas	56	0	56	5.34%	0.03%	5.32
Caribou	482	2	480	7.01%	0.07%	6.94
Cassia	1,695	6	1,689	7.25%	0.07%	7.19
Elmore	1,466	15	1,451	6.11%	0.12%	5.99
Fremont	760	4	756	6.10%	0.05%	6.05
Jerome	1,232	4	1,228	5.22%	0.04%	5.17
Latah	1,662	47	1,615	4.22%	0.28%	3.95
Lincoln	370	0	370	6.99%	0.01%	6.98
Madison	1,144	101	1,043	2.94%	0.71%	2.23
Minidoka	1,326	7	1,319	6.42%	0.09%	6.33
Payette	1,671	9	1,662	7.23%	0.09%	7.14
Teton	239	9	230	2.09%	0.15%	1.95
Twin Falls	5,882	38	5,844	7.00%	0.11%	6.88
Nonmetro noncore						
Adams	413	1	412	10.14%	0.03%	10.12
Bear Lake	398	2	396	6.68%	0.06%	6.62
Benewah	973	1	972	10.74%	0.03%	10.72
Boundary	823	2	821	7.00%	0.04%	6.96
Clark	31	0	31	3.40%	0.00%	3.40
Clearwater	823	2	821	10.63%	0.03%	10.60
Custer	736	1	735	17.73%	0.02%	17.71
Gooding	1,059	2	1,057	7.03%	0.04%	6.99
Idaho	1,849	3	1,846	11.68%	0.03%	11.65
Jefferson	1,058	5	1,053	3.71%	0.05%	3.66
Lemhi	749	1	748	9.63%	0.02%	9.61
Lewis	521	0	521	13.68%	0.01%	13.67
Oneida	480	0	480	11.02%	0.02%	11.00
Power	730	0	730	9.58%	0.00%	9.58
Shoshone	1,735	4	1,731	13.93%	0.05%	13.88
Valley	851	11	840	8.01%	0.09%	7.92
Washington	959	2	957	9.63%	0.03%	9.59
Idaho (state-wide)	**103,996**	**1,037**	**102,959**	**6.13%**	**0.14%**	**5.99**

Source: 2019 5-year ACS estimates and Root Policy Research.

Economists project that 21% of households will have at least one resident with a physical limitation disability in 2050.[6] The same study also estimates that there is a 60% probability that a newly built single-family detached unit will house at least one disabled resident during its expected lifetime, and 91% will welcome a disabled visitor. Given these projections, housing developers may wish to prioritize visitability features. A house is considered visitable when it has at least one zero-step entrance, has doors with 32 inches of clear passage space, and has one bathroom on the main floor one can get into in a wheelchair. These amenities are good for residents and for the local economy: they reduce the likelihood of future retrofitting costs, allow more homes to be accessible to workers with disabilities, and are desirable to homebuyers.[7]

Additionally, accessible homes have been shown to reduce the cost of in-home care, thus reducing the financial burden faced when paying for formal care labor and the time burden faced by informal care providers.[8] Other studies have found that the effect of disability on mental health is worse if living in unaffordable housing, meaning that affordable and accessible housing for individuals with disabilities could also reduce associated mental healthcare costs.[9]

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[6] Smith, Stanley K., Stefan Rayer, and Eleanor A. Smith. "Aging and disability: Implications for the housing industry and housing policy in the United States." *Journal of the American Planning Association* 74.3 (2008): 289-306.

[7] Nasar, J. L., & Elmer, J. R. (2016). Homeowner and homebuyer impressions of visitable features. *Disability and health journal*, *9*(1), 108-117.

[8] Smith, Stanley K., Stefan Rayer, and Eleanor A. Smith. "Aging and disability: Implications for the housing industry and housing policy in the United States." *Journal of the American Planning Association* 74.3 (2008): 289-306.

[9] Kavanagh, A. M., Aitken, Z., Baker, E., LaMontagne, A. D., Milner, A., & Bentley, R. (2016). Housing tenure and affordability and mental health following disability acquisition in adulthood. *Social science & medicine*, *151*, 225-232.

SECTION IV.

ACCESS TO OPPORTUNITY

SECTION IV.
Access to Opportunity

This Access to Opportunity section examines the many factors that determine the economic health of Idaho's communities and neighborhoods—which in turn, determine the health of Idaho residents. Access to economic opportunity is measured through:

- Economic health as measured by Gross Domestic Product (GDP), employment opportunities, and income inequality;
- Growth of firms and jobs;
- Migration and commute trends;
- Environmental health; and
- Access to work enabling services like transportation, broadband, childcare, healthcare, education/training.

In reading this analysis, it is important to note that access to opportunity is multi-faceted, complex, and requires a collective effort to facilitate change. This section provides base data and trends to inform future efforts to improve access to opportunity—and to support Idaho's economic growth in a way that benefits those who need it the most.

Primary Findings

- Overall, Idaho's GDP growth has been consistent and strong: statewide real GDP grew by 62% between 2001 and 2019. Over the same two decades, Idaho experienced a 55% increase in the number of private firms in the state.

- Industries with the largest job growth between 2013 and 2019 were construction (60%) and arts, entertainment, and recreation (38%). Unfortunately, such jobs had relatively low wages: construction's average weekly wages were $889 in 2019 while arts, entertainment, and recreation were less than $400. The average worker in Idaho received $864 per week in the first quarter of 2021.

- Low wages in several sectors means that housing costs are difficult to cover. In fact, 42% of households in which the head works in entertainment, recreation, accommodation, or food service are cost burdened.

- Had all cost burdened households in Idaho been able to spend just 30% of their incomes in housing costs, this would have freed up about $971,230,300 per year.

- The richest quintile of Idahoans earns 48% of the states' income. This is slightly less than the U.S. average, where the richest quintile earns 52% of the nation's income. However, income inequality worsened slightly more rapidly in Idaho than in the US as a whole. Between 2010 and 2019, the Gini coefficient increased by 3% nationwide, but by 4% in Idaho

- Although Idaho's unemployment rate is remarkably low, labor force participation in Idaho has decreased steadily since the early 2000s.

- About 8% of Idahoan households do not own a computer, including a smartphone or tablet. This is slightly higher than the national average of 7%. Additionally, 17% of Idaho households do not have an internet subscription, which is substantially higher than the U.S. average of 13% of households. This inhibits job opportunities and firm growth for several Idahoans.

- Idaho's schools are performing better than the national average: 63% of fourth-graders in Idaho were not proficient in reading compared to 66% nationwide. Similarly, 63% of Idaho's eighth graders are not proficient in math compared to 67% of students nationwide.

- 91% of Idahoans over age 25 have a high school diploma. This is higher than the national average of 88%. However, just 28% of Idahoans over 25 have a bachelor's degree compared to 32% nationwide. On average, those with a post-secondary degree have much higher earnings that those without. In Idaho, workers with a bachelor's degree earn $17,500 more on average than those with just a high school diploma. Enrollment at public colleges, universities, and community colleges in Idaho has increased by 5% since 2011, and about 37% of Idaho's population aged 18 to 24 are currently enrolled in college or graduate school. While this is lower than the national average, it is on par with peer states.

- Just 35% of 3- to 4-year-olds in Idaho are enrolled in school, which is substantially lower than the national average of 48% and lower than peer states. As a result, women with young children in Idaho have substantially lower labor force participation rates (64%) than all working-age women (71%) and men (83%).

- Idaho has several healthcare gaps that inhibit workers from fully participating in the economy. Idaho has the lowest proportion of physicians as a share of the population compared to any other state: there are just 2.4 physicians for every 1,000 people, while the median rate across all fifty states and D.C. is 3.5. Further, 13% of Idaho's population under age 65 did not have health insurance. This was above the national average of 10%.

- Overall, 16% of Idahoan workers commute to a county different from the one in which they live and 5% commute outside the state.

- In 2019, an estimated 53,937 Idaho residents moved from one county within Idaho to another. Ada County saw the largest net inflow from other counties, with 1,864 net within-state migrants. Bingham (891), Kootenai (876), Payette (550), and Gooding (479) counties also experienced a large number of net in-migrants from other counties in Idaho.

- Many of the domestic migrants moving to Idaho were from California: an estimated 13,388 individuals moved to Idaho from California in 2019. A large share of net in-migrants also came from Colorado, Nevada, and Wyoming. Idahoans who left the state most commonly moved to Washington State (1,039 net outmigrants from Idaho to Washington) and Iowa, Montana, Michigan, and Utah.

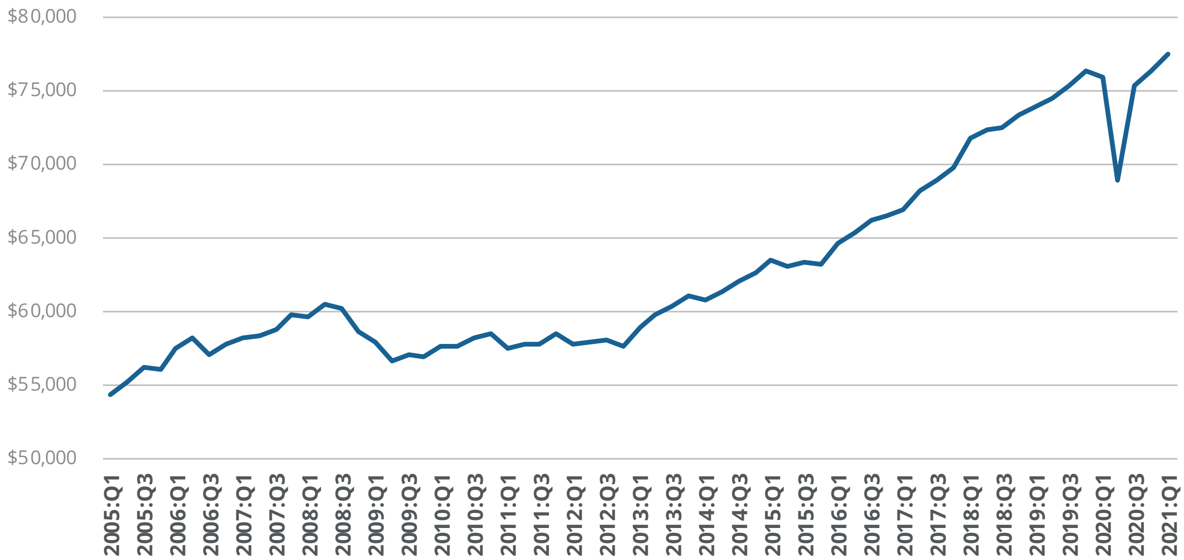
- In 2019 there were an estimated 7,526 international immigrants who moved to Idaho. The majority were from Asia (29%) and Europe (26%), and Central America (19%). Many of these in-migrants actively participate in the economy at higher rates than domestic-born Idahoans: 71% of foreign-born residents are in the labor force as opposed to 63% of native-born residents. Foreign-born workers are more likely to work in industries like agriculture, mining, construction, and manufacturing compared to U.S.-born workers. They are also more likely to be employed in entertainment, accommodation, and food service jobs—generally lower paying jobs.

Idaho's Economy at a Glance

With steady growth in production, firms, and jobs accompanied by low unemployment rates, Idaho's economy appears consistently strong. However, increasing income inequality, decreasing labor force participation rates, and stagnating wages in some industries and counties have put many workers in a bind. In this section, we examine each of these measures and provider context for the future of Idaho's economic development.

GDP growth. Gross domestic product (GDP) measures the value of all goods and services produced in Idaho, in including net exports. Real GDP holds prices constant and therefore does not pick up inflation in estimates of production. As illustrated in Figure IV-1, Idaho's GDP declined during the Great Recession and did not reach full recovery for nearly 5 years. Idaho's real GDP decreased again, by 9%, between the first and second quarters of 2020—a result of the COVID-19 pandemic—but recovered in the third quarter. Overall, since 2013, Idaho's GDP growth has been consistent and strong.

Figure IV-1.
Real Gross Domestic Product in Millions of Chained Dollars, State of Idaho, 2005 to 2020



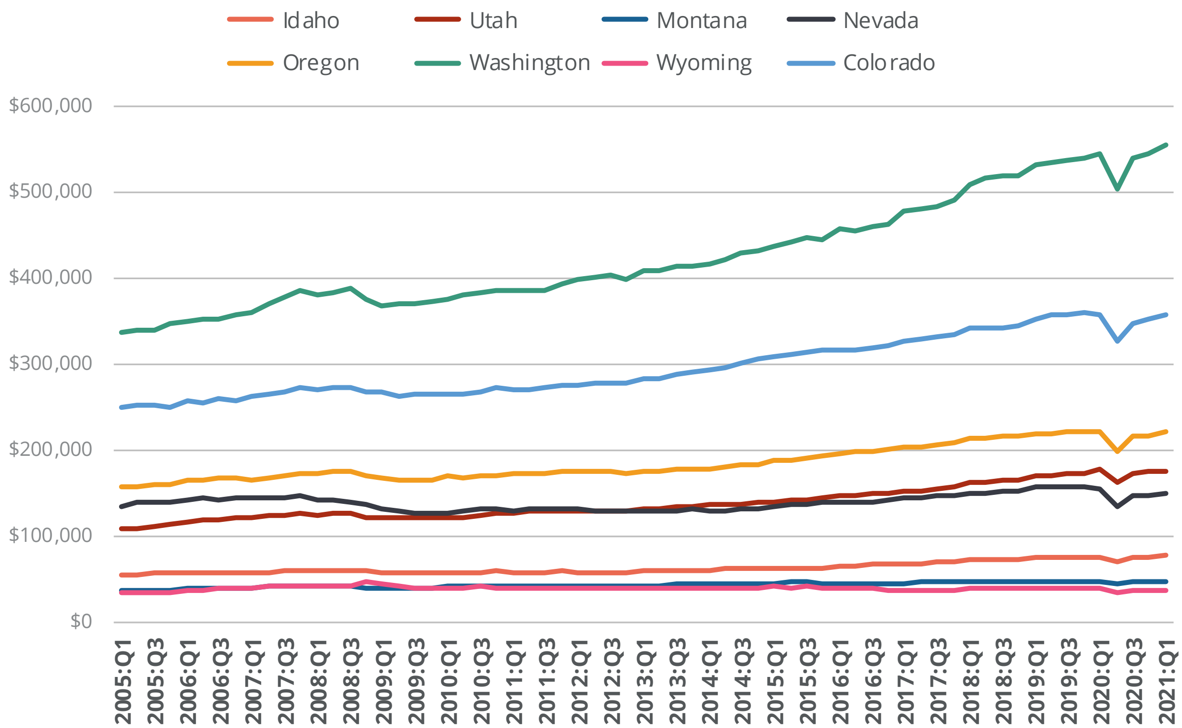
Notes: Real GDP is in millions of chained 2012 dollars. Calculations are performed on unrounded data. Chained (2012) dollar series are calculated as the product of the chain-type quantity index and the 2012 current-dollar value of the corresponding series, divided by 100.

Source: Bureau of Economic Analysis and Root Policy Research.

This COVID-related dip in GDP was common in peer states too, as illustrated in Figure IV-2. When Idaho's GDP fell by 9% in the onset of COVID, Montana, Oregon, Colorado, and Utah's also fell by the same share. Other states like Wyoming and Nevada experienced sharper declines, by 10% and 14% respectively. Of its neighboring states, only Washington fared better than Idaho during COVID, with just a 7% drop in GDP between the first and second quarters of 2020.

Washington has also experienced more growth than Idaho since 2005, as illustrated by the slopes of the lines in Figure IV-2. From 2005 to 2020, Idaho's GDP grew by 42% while Washington's grew by 65% and Utah's grew by 64%. Idaho's growth kept pace closely with Colorado and Oregon's, whose GDP increased by 43% and 41% respectively over the period. Idaho's growth far outpaced Montana's and Wyoming's: both grew by only about 10% over the period.

Figure IV-2.
State-Level Real Gross Domestic Product in Millions of Chained Dollars, State of Idaho and Peer States, 2005 to 2020



Notes: Real GDP is in millions of chained 2012 dollars. Calculations are performed on unrounded data. Chained (2012) dollar series are calculated as the product of the chain-type quantity index and the 2012 current-dollar value of the corresponding series, divided by 100.

Source: Bureau of Economic Analysis and Root Policy Research.

By the first quarter of 2021, Idaho's real GDP had reached $77.4 billion: higher than Montana and Wyoming's GDP, but lower that other peer states.[1] Private industries contributed to 88% of Idaho's GDP while government and government enterprises contributed the remaining 12% of GDP.

Real estate, rental, and leasing industries contributed the most among private industries: 13% of the states' total GDP in the first quarter of 2021 came from real estate and rentals. Manufacturing was the second-highest contributor and was responsible for 12% of Idaho's real GDP. Retail trade, heath care and social assistance, and state/local governments each contributed 8% to Idaho's GDP. Agriculture, forestry, fishing, and hunting contributed a combined 7%.

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[1] In chained 2012 dollars.

The most recent county-level GDP data are from 2019. Counties with the largest contributions to the state's real GDP in 2019 were Ada County (35%), Canyon County (8%), and Kootenai County (8%).

Statewide real GDP grew by 62% between 2001 and 2019. Many counties experienced faster economic growth than the state overall—largely rural counties. For instance, real GDP in in Lincoln County grew by 150% between 2001 and 2019, from $133 million to $332 million.[2] Similarly, Camas, Teton, Jefferson, and Gooding counties each experienced growth between 100% and 120% from 2001 to 2019.

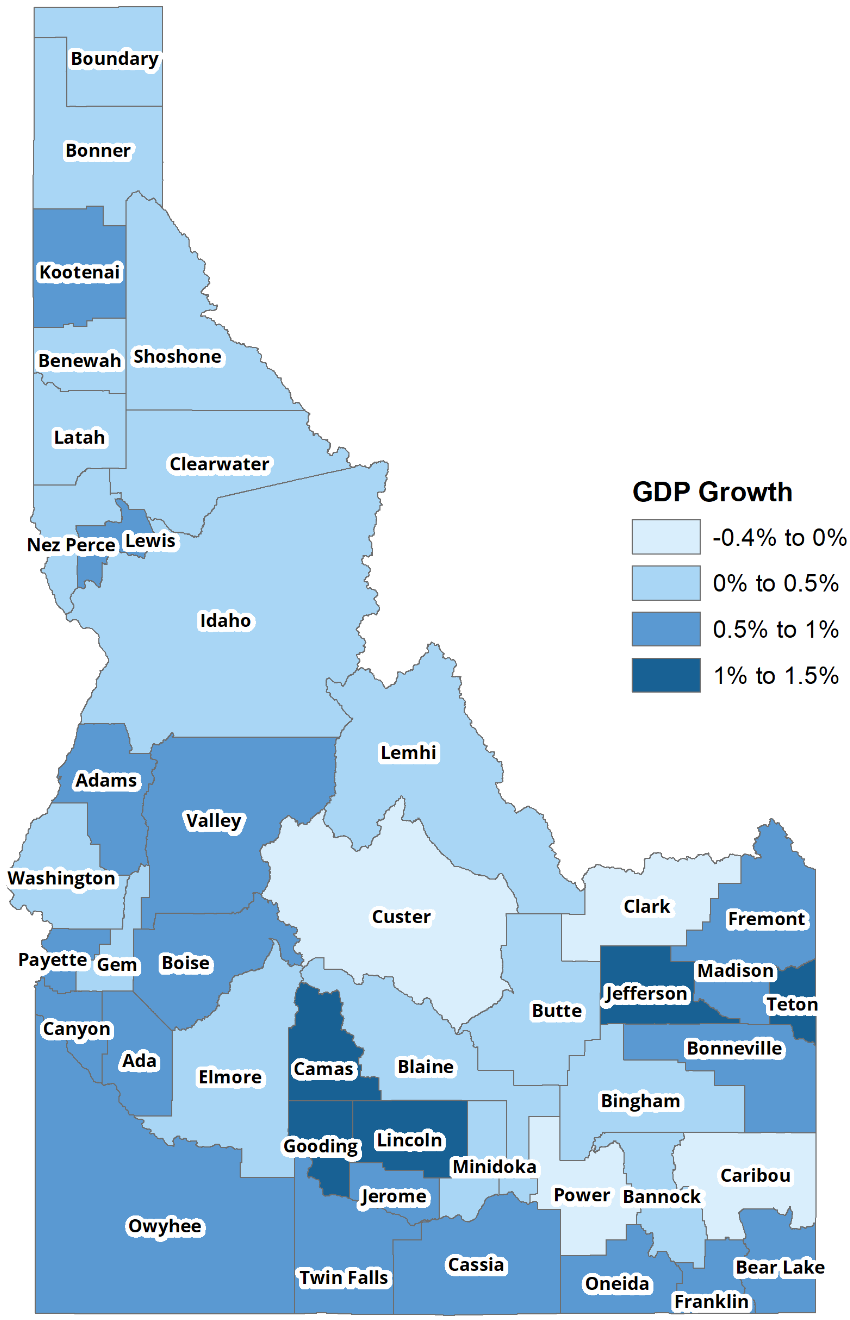
A few counties experienced declines in economic production over the last two decades. Caribou County's real GDP decreased by 41% between 2001 to 2019, from $849 million to $499 million. Power and Custer counties also experienced economic decline: their real GDP decreased by 23% and 9% respectively over the same period.

[2] In chained 2012 dollars.

Figure IV-3. GDP Growth by County, 2001 to 2019

Source:

Bureau of Economic Analysis and Root Policy Research.



Job growth. While statewide GDP grew by 62% from 2001 to 2019, jobs grew by a lower 27% according to data from the Bureau of Economic Analysis (BEA). This suggests that productivity growth outpaced employment growth, perhaps due to higher levels of productivity per-worker or technological improvements. In 2019, there were 1,071,664 jobs in the state—an increase from 783,399 in 2001, or 288,265 more jobs.

Idaho's job growth between 2001 and 2019 is similar to that of peer states. For instance, Montana, Oregon, and Wyoming each experienced close to a 25% increase in number of jobs. Other peer states experienced more rapid job growth over the same period, namely Washington (32%), Nevada (48%), and Utah (53%).

A handful of counties in Idaho **lost jobs** over the period:

- Clark County had 786 jobs in 2001 and by 2019 had just 543, a decrease of 45%.
- Clearwater County, Butte County, and Power County also saw job losses over the last two decades, decreasing by 6%, 4%, and 2% respectively.

Other counties had **job growth** that exceeded statewide job growth:

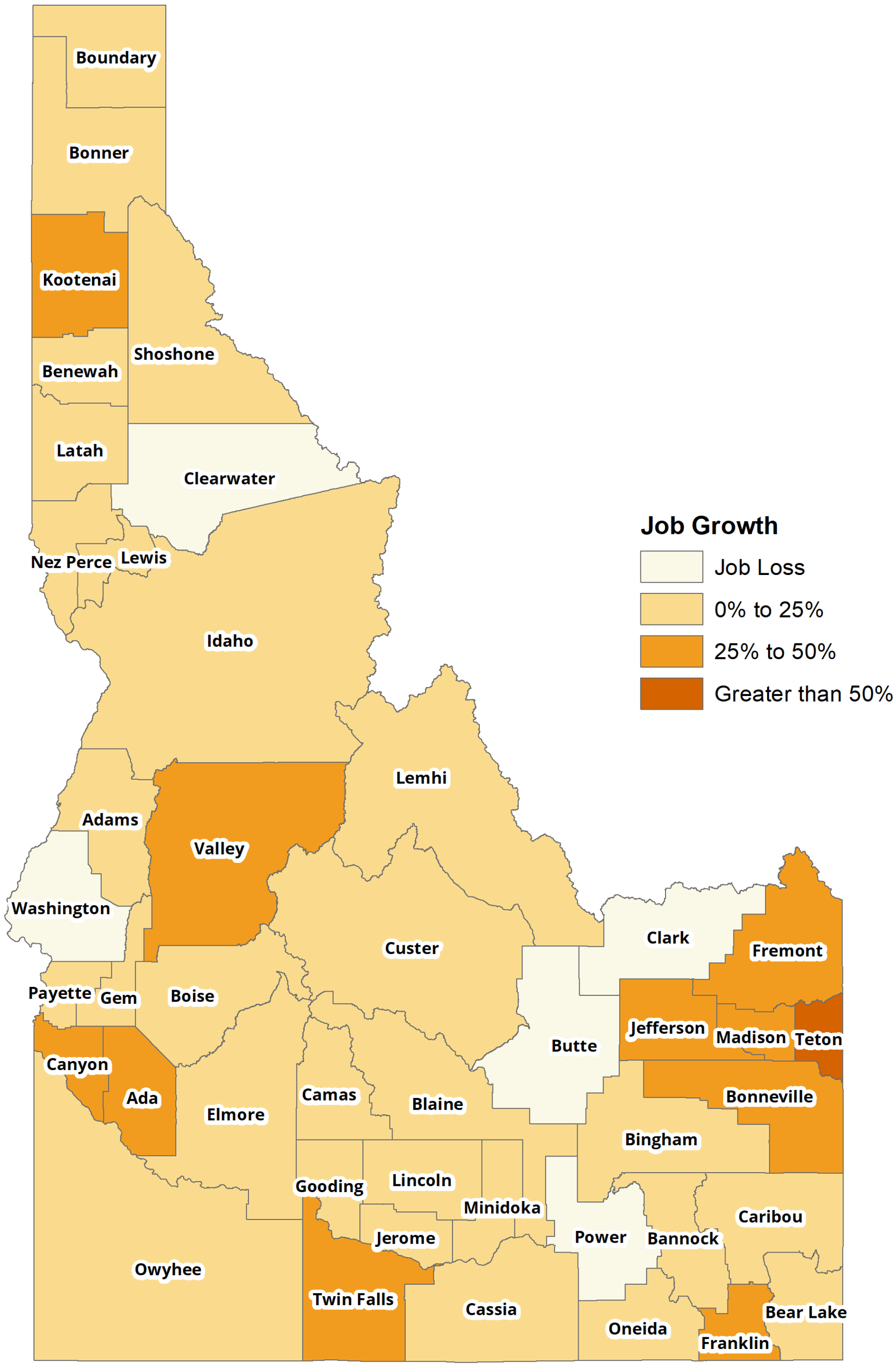
- Teton County experienced the largest percent change in jobs over the period, with just 2,997 jobs in 2001, rising to 7,143 jobs in 2019, a 58% increase.

  Kootenai, Canyon, and Madison Counties also experienced large job growth, with 35% to 37% increases over the last two decades.

Figure IV-4. Job Growth by County, 2001 to 2019

Source:

Bureau of Economic Analysis and Root Policy Research.



In 2019, over 32% of Idaho's jobs in 2019 were located in Ada County. Ten percent of the state's jobs were located in Canyon County and 9% were in Kootenai County.

Job growth also differed by industry according to data from the Idaho Department of Labor. Between 2013 and 2019,

- Jobs in the mining, quarrying, and oil/gas extraction industry decreased by 10% (a loss of 257 jobs).
- The information industry lost 506 jobs, a 5% reduction.
- Jobs grew in the construction industry and the arts, entertainment, and recreation industry. Those industries saw the largest relative increases in jobs between 2013 and 2019. Construction jobs increased from 31,744 jobs in 2013 to 50,697 in 2019, an increase of 60%. The healthcare and social assistance industry saw a 22% increase in jobs between 2013 and 2019, representing 17,743 additional jobs, the second highest number of job increases after the construction industry. Arts, entertainment, and recreation jobs increased by 38%, from 9,202 in 2013 to 12,657 in 2019. Figure IV-5 illustrates relative job growth in other industries over the period.

Figure IV-5.
Job Growth and Decline by Industry, State of Idaho, 2013 to 2019

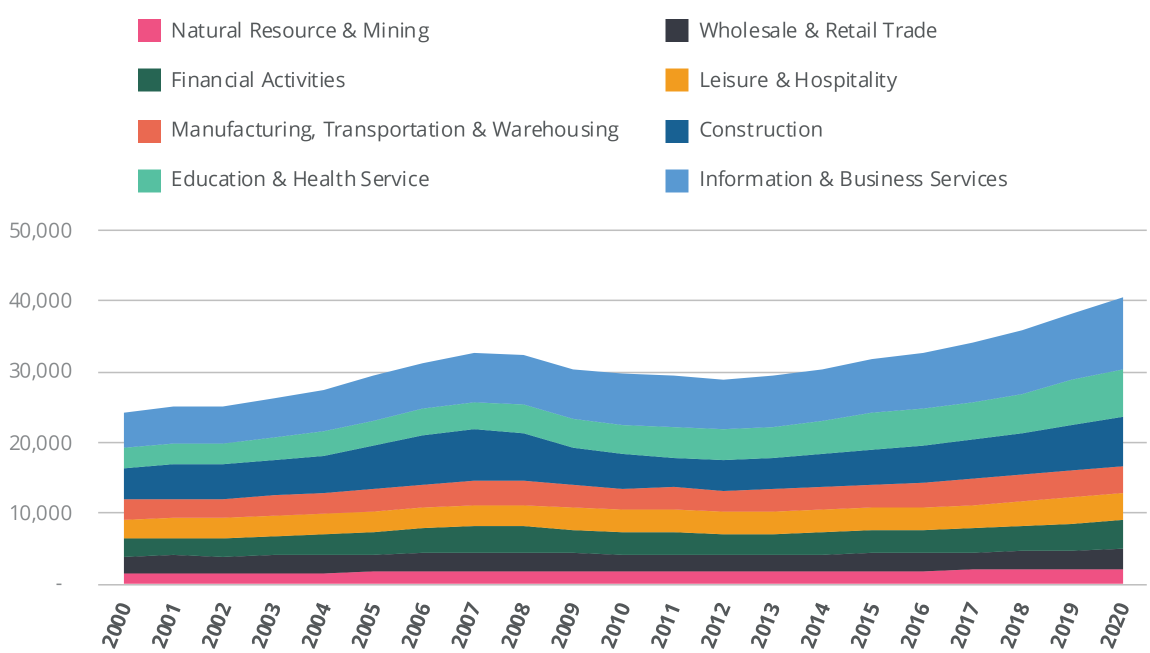
Notes: These data do not include job growth in public sectors.
Source: Idaho Department of Labor and Root Policy Research.

Business growth. Much of Idaho's job growth is attributable to new businesses start-ups across the state. From 2000 to 2020, Idaho experienced a 55% increase in the number of private firms. This is substantially higher than start-up rates in peer states. Over the same period, Montana experienced a 34% increase in its total number of firms. Nevada experienced a 29% increase, Wyoming and Utah experienced 18% increases, Washington experienced an 11% increase, Colorado experienced a 4% increase, and Oregon experienced a 6% decrease.

Figure IV-6 uses Bureau of Labor Statistics (BLS) data to illustrate increases in firms over the period by industry. Almost all industries saw an increase in the number of firms over the period, with the only exception being firms in retail trade, which decreased by 5%. The largest increase in number of firms took place in the health services and education industry, where there were 2,921 firms in 2000 and 6,716 in 2020—an increase of 130%. The next strongest growth was for firms in the information, professional, and business services industries, an increase of 107%. In contrast, firm growth was slower in the wholesale trade industry and in the natural resource and mining industry, where each experienced just a 27% increase in the number of firms between 2000 and 2020.

As the figure demonstrates, the industries of information and business services and education and health services make up a larger share of Idaho's firms than in 2000, while other industries, except for construction, have stayed relatively constant.

Figure IV-6.
Firm Growth by Industry, State of Idaho, 2000 to 2020



Notes: Manufacturing was combined with Transportation & Warehousing industries to reduce busyness in the figure. Wholesale and retail trade were also combined, as were Information and Business Services.

Source: Bureau of Labor Statistics and Root Policy Research.

In 2020, 23% of firms statewide were professional or business services. Other industries representing a large portion of total firms were education and health services (17%), construction (17%) retail trade (10%), financial activities (10%), and leisure and hospitality (9%). Only 2% of firms were in the information industry, 4% were in transportation and warehousing, and 5% were in the natural resource and mining industry.

The benefits new firms and job growth have not been accrued to Idaho's counties uniformly. Firms typically choose to locate and/or expand operations in areas where they can find labor, space, synergies with other businesses, and growth efficiencies. According to 2019 data from the Census Bureau's County Business Patterns, Ada County held about 30% of the state's firms. However, by industry, Ada County held 50% of the state's management companies, 39% of the state's professional scientific and technical services, and 39% of the state's information services—all high paying industries. Kootenai County held 10% of all the state's firms but held almost 20% of the utility firms and 13% of the state's manufacturing firms. Canyon County also held about 10% of Idaho's firms, including many of the construction and manufacturing firms, where they housed 16% and 13% respectively.

Shoshone County, though only having less than 1% of the total firms statewide, held 14% of the state's total mining, quarrying, and oil/gas extraction firms. Cassia County has a similar story, where their firms represented 1.5% of the state's total businesses, but 12% of the states total mining, quarrying, and oil/gas extracting firms.

High concentrations of certain industries in various counties means there has been high variability in wages and unemployment among counties, which is discussed in the subsequent sections.

Income inequality. Economic growth has helped pull some Idahoans out of poverty. Idaho has experienced a recent reduction in poverty rates: currently, 11.2% of Idahoans live below the poverty line, which is less than the 15.6% in 2014 and less than the 12 % in 2000. Idaho's current poverty rate is similar to nearby Oregon (11.4%) and slightly lower than the nation overall (12.3%).[3]

However, poverty rates are higher for families with children: 13% of children in the state live below the poverty line. Idahoans with disabilities are also more likely to live in poverty compared to the overall population. According to 5-year ACS data from 2019, 19% of Idahoans with disabilities have an income below the poverty line. For these reasons, inclusive growth strategies are pivotal for reducing poverty rates and for reducing the gaps between the rich and the poor.

[3] The poverty threshold is set at the federal level and varies by household size. It is roughly $26,000 for a family of four.

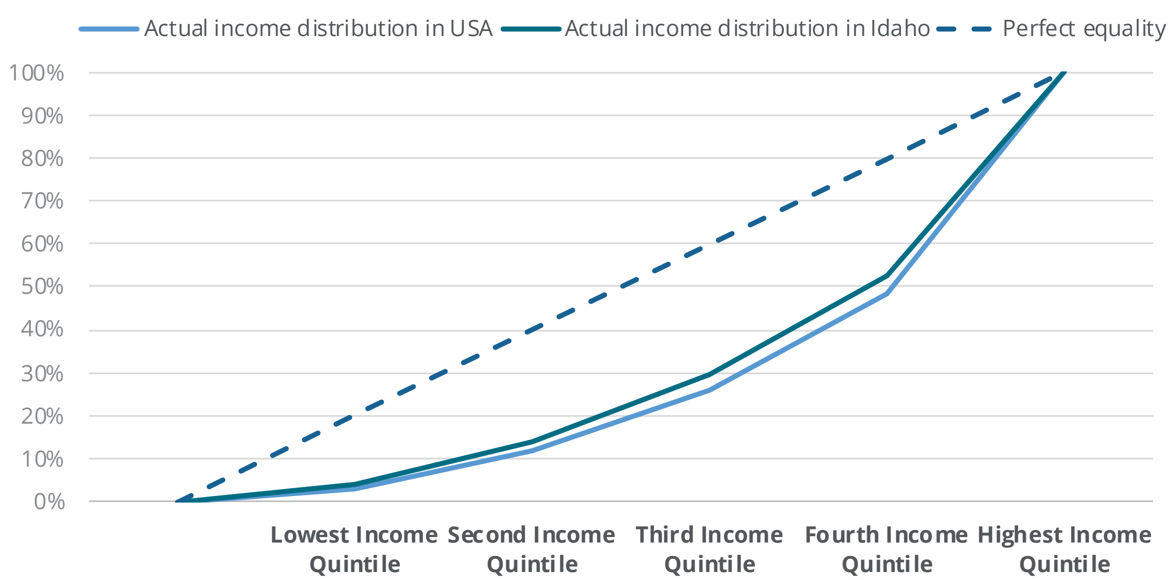
In fact, like in most of the country, income inequality in Idaho has worsened over the last several decades. According to analyses from the Economic Policy Institute:

- The *richest* 20% of households have experienced a 63% growth in their incomes from the 1970s to 2005.
- Over the same period, the *poorest* 20% of households experienced just a 12% growth in their incomes; and
- The *middle* 20% of households experienced a 27% increase in their incomes.

Another way to measure income inequality is through use of the Lorenz curve and Gini coefficient. The Lorenz curve, as illustrated in Figure IV-7, graphs the cumulative percentage of total income against the cumulative percentage of population (ranked from poorest quintile to richest quintile). For instance, the poorest 20% of households in Idaho earn 3% of the state's income and the second poorest quintile earn 10% of the state's income, meaning that cumulatively these two groups earn 13% of the states' income, as illustrated on the graph.

The richest quintile of Idahoans earns 48% of the states' income. This is slightly less than the U.S. average, where the richest quintile earns 52% of the nation's income.

Figure IV-7.
Lorenz Curves, State of Idaho and United States, 2019



Source: 2019 1-year ACS estimates and Root Policy Research.

Income inequality is slightly worse nationally compared to Idaho, as indicated by the larger area between the perfect equality line and the U.S. Lorenz curve.

The Gini coefficient is a measure of the area between the perfect equality line and the Lorenz curve. The Gini coefficient ranges from 0 to 1, representing perfect equality and perfect inequality respectively. Therefore, the higher the Gini coefficient, the worse the income inequality. According to 2019 5-year ACS data, Idaho's Gini coefficient was a 0.446. Idaho's Gini coefficient of income inequality is lower than in the U.S. (0.482) and many of its neighbors.

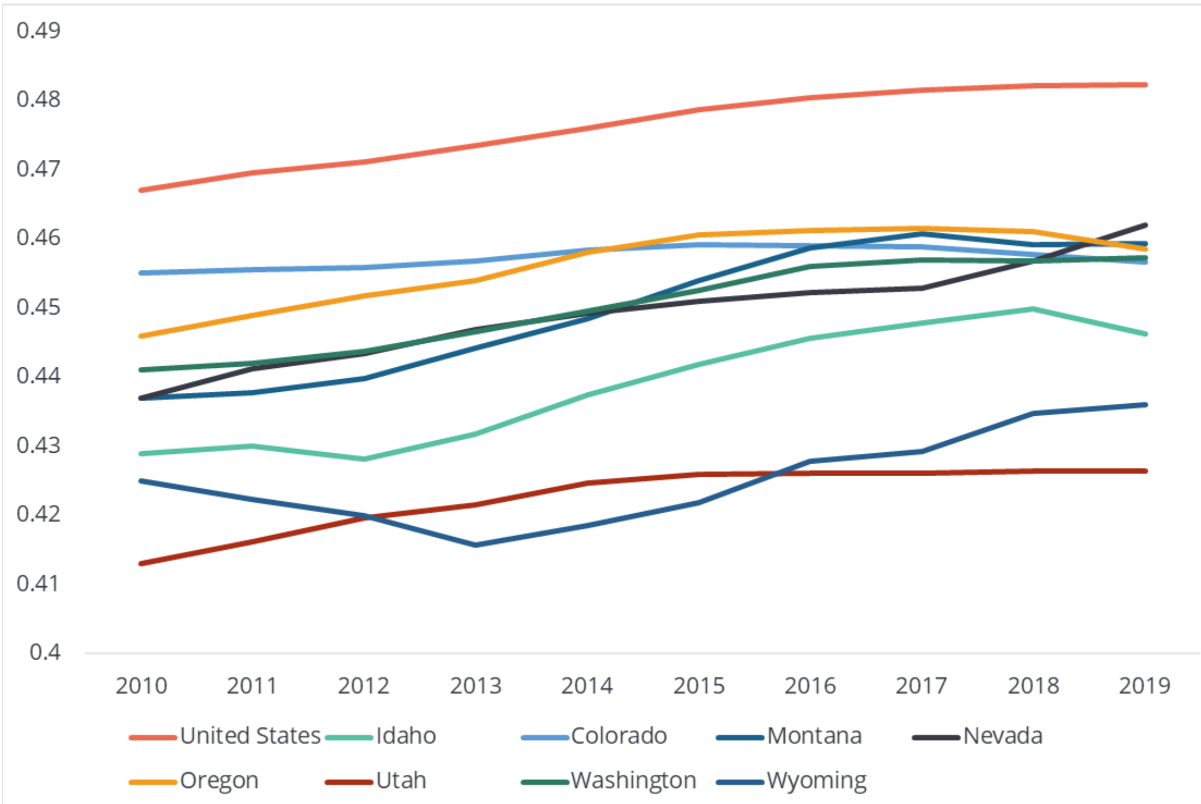
For example, the Gini coefficient in peer states in 2019 was:

- Utah: 0.427
- Montana: 0.459
- Nevada: 0.462
- Washington: 0.457
- Wyoming: 0.436
- Oregon: 0.459

These data suggest that income inequality is worse in Idaho than in Utah and Wyoming. However, there was more income inequality in Montana, Nevada, Oregon, and Washington than in Idaho.

Though income inequality remains higher nationally and in many peer states, income inequality worsened slightly more rapidly in Idaho than in the US as a whole. Between 2010 and 2019, the Gini coefficient increased by 3% nationwide, but by 4% in Idaho. Income inequality in Idaho also increased more rapidly than in many peer states. In Colorado, the Gini coefficient remained constant from 2010 to 2019, and in Oregon, Utah, and Wyoming it increased by just 3%. However, in Montana and Nevada, Gini coefficients increased by 5% and 6% respectively, indicating income inequality worsened at a faster rate in those states than in Idaho.

Figure IV-8.
Gini Coefficient, State of Idaho and Peer States, 2010 to 2019



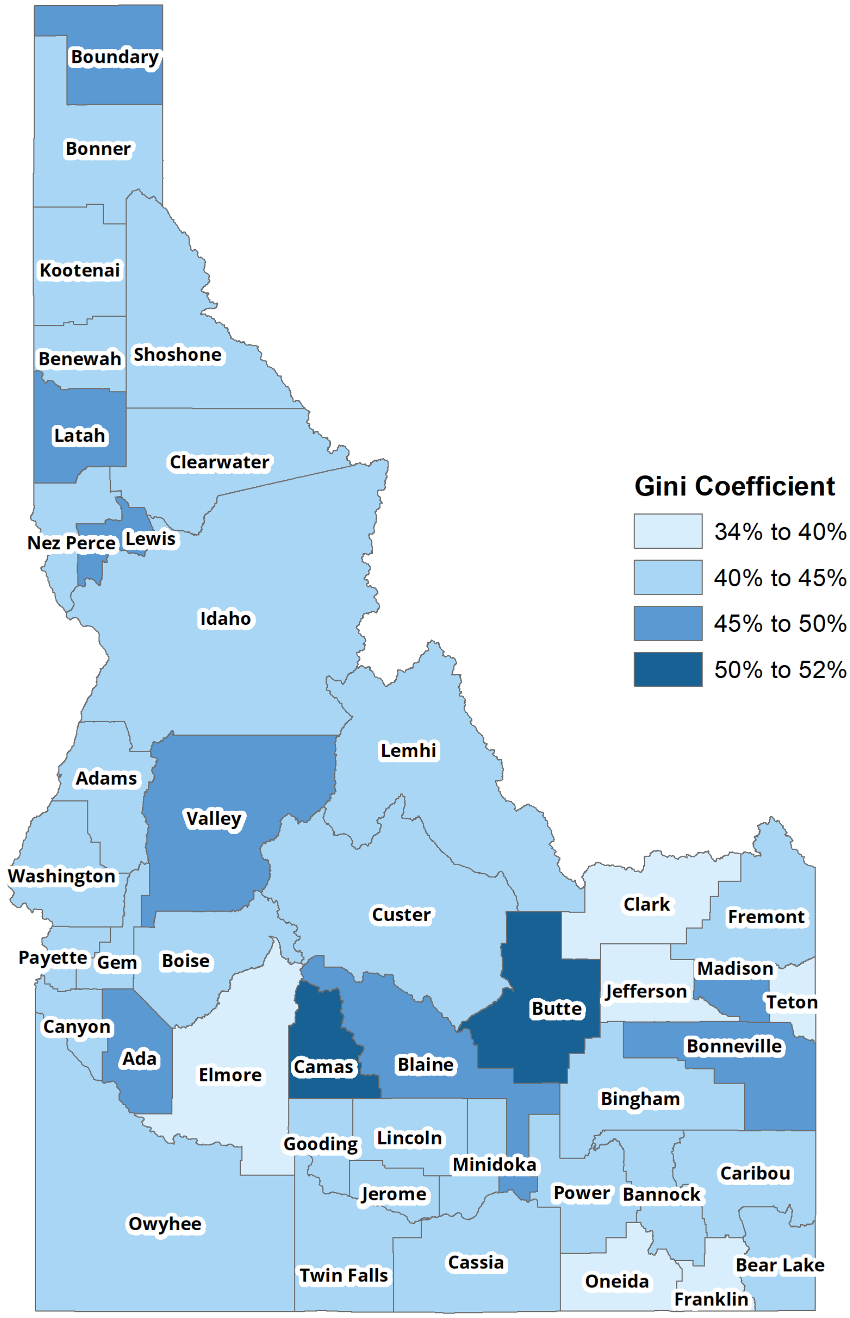
Source: 2019 1-year ACS estimates and Root Policy Research.

Figure IV-9 illustrates the Gini coefficient for each county in Idaho. The most unequal counties were Butte and Camas counties, each with Gini coefficients of 0.52, followed by Madison, Boundary, and Blaine counties, each with Gini coefficients of 0.48. The counties with an income distribution closest to equality were Clark County, with a Gini coefficient of 0.34, and Oneida County, with a Gini coefficient of 0.36.

Figure IV-9.
Gini Coefficients by County, 2019

Source:

2019 5-year ACS estimates and Root Policy Research.

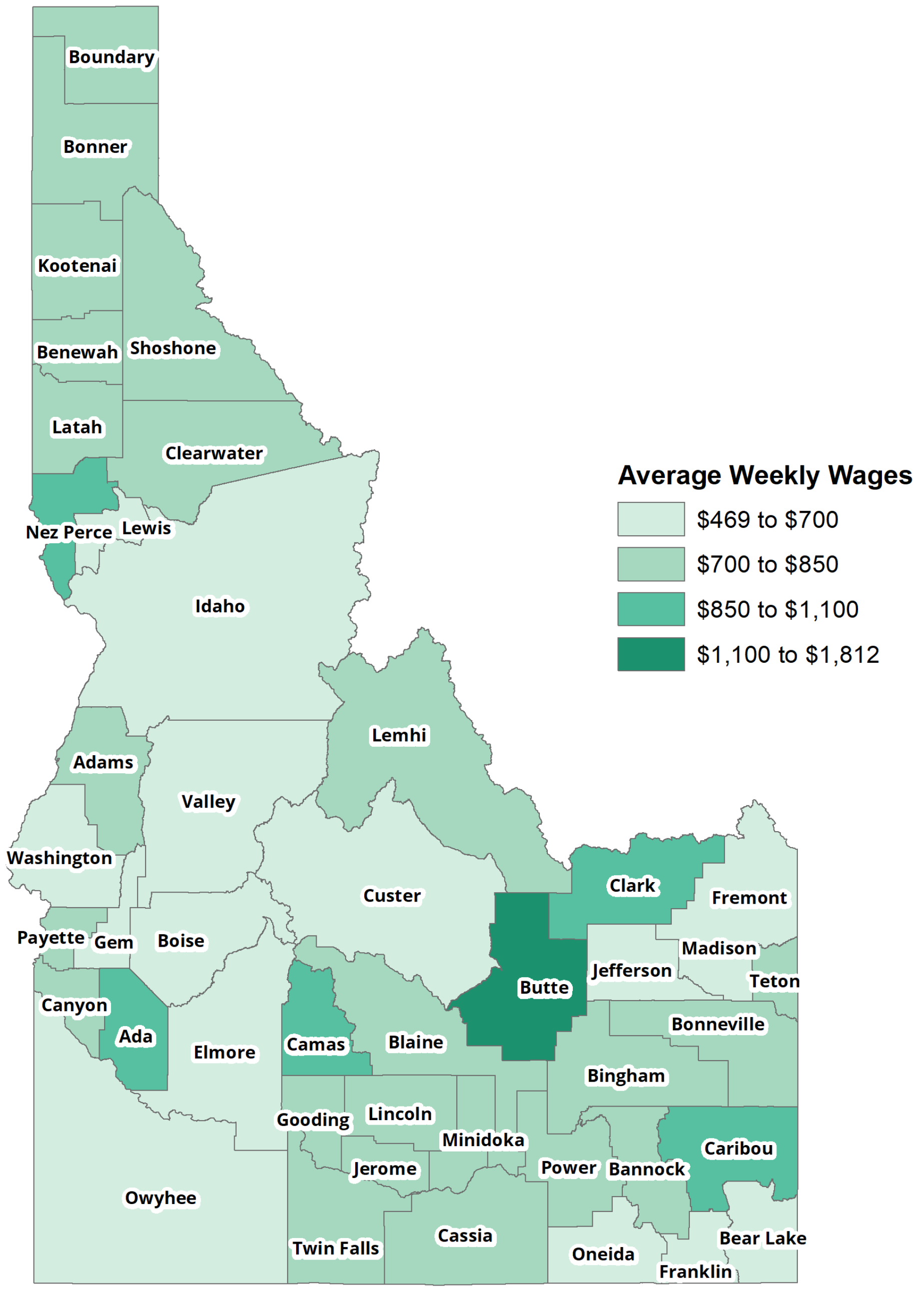


Labor market trends. Across the state, the average worker received $864 per week in the first quarter of 2021. Average wages paid to workers fluctuates considerably among Idaho counties according to data from BLS. Weekly wages are highest in Butte County at $1,812 per week—equivalent to an annual salary of $94,000. Much of this may be driven by individuals employed by the US Department of Energy working in the Idaho Nuclear Technical and Engineering Center The next highest average weekly wage is in Ada County ($1,012), which is expected given the concentration of high paying industries. This is followed by Caribou ($1,036), which has an active natural resource and phosphate mining industry.

The lowest average weekly wages were in Boise ($469), Oneida ($553), Bear Lake ($571), and Franklin ($597) counties.

Figure IV-10. Average Weekly Wages by County, January-March 2020

Source:
Idaho Department of Labor and Root Policy Research.



Wages in most industries have been growing in Idaho over the past several years. According to the Idaho Department of Labor, average weekly wages in 2019 were $852, a 21% increase from $706 in 2013. Some of the highest-paying industries have had smaller or even negative wage growth, as illustrated in Figure IV-11. For instance, those in the mining and extraction industry had average weekly wages of $1,405 in 2019, but this was a 3% decrease from their $1,447 weekly wages in 2019. Similarly, those in management, utilities, and professional services saw slower wage growth than the industry-wide average, but still had relatively high wages. Wages in finance and insurance, on the other hand, increased by 29% from 2013 to 2019, as did wages in wholesale trade. Many low-wage industries saw growth between 2013 and 2019 yet continue to have weekly wages that often do not adequately cover living expenses.

Figure IV-11.
Wage Growth by Industry, State of Idaho, 2013 to 2019

	Average weekly wages in 2019	Percent change from 2013
Total, All Industries	**$ 852**	**21%**
Management of Companies & Enterprises	$ 1,901	17%
Utilities	$ 1,695	16%
Mining, Quarrying, & Oil/ Gas Extraction	$ 1,405	-3%
Professional & Technical Services	$ 1,311	19%
Finance & Insurance	$ 1,278	29%
Wholesale Trade	$ 1,230	29%
Manufacturing	$ 1,201	17%
Information	$ 1,081	25%
Construction	$ 889	18%
Transportation & Warehousing	$ 853	21%
Health Care & Social Assistance	$ 839	17%
Educational Services	$ 803	13%
Real Estate & Rental & Leasing	$ 758	28%
Agriculture, Forestry, Fishing & Hunting	$ 732	25%
Administrative & Waste Services	$ 716	39%
Other Services	$ 627	26%
Retail Trade	$ 604	18%
Arts, Entertainment, & Recreation	$ 399	26%
Accommodation & Food Services	$ 331	24%

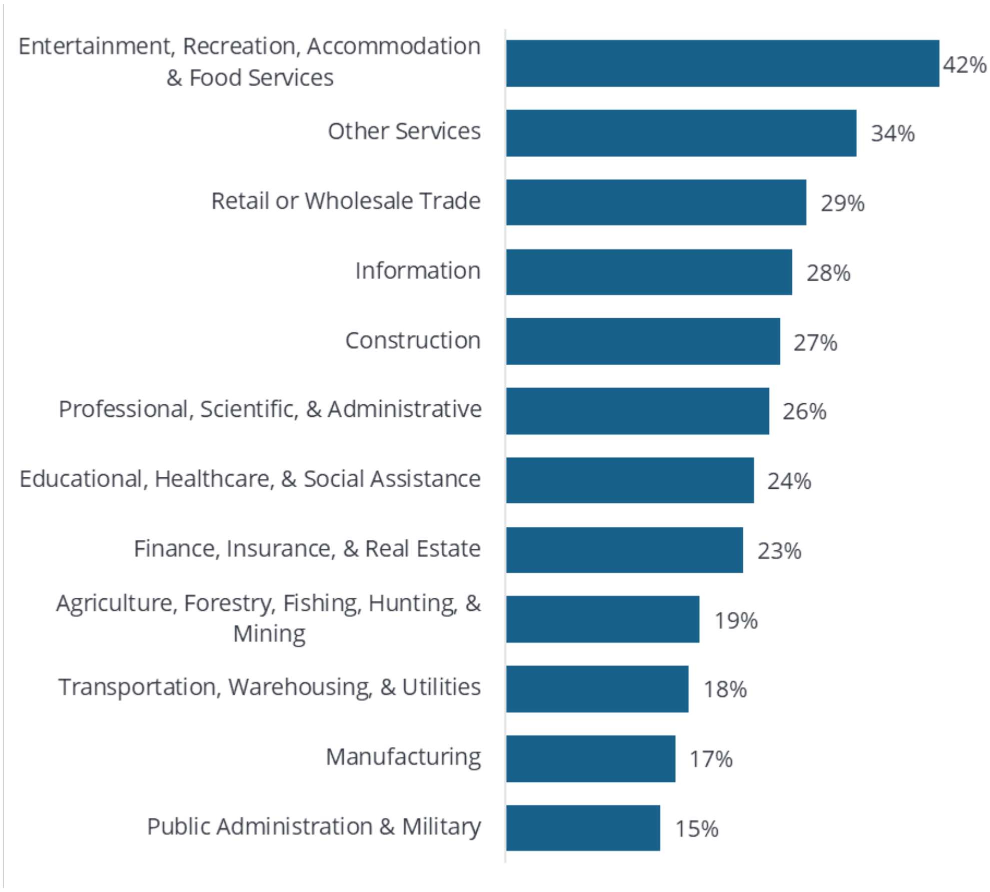
Notes: These data do not include wages in public sectors.

Source: Idaho Department of Labor and Root Policy Research.

Low wages in several sectors means that housing costs are difficult to cover. Over the same period (2013 to 2019) average rents increased by 17%, from $728 to $853 per month. This means that the incomes of those employed in the utilities industry, educational services, or mining did not keep up with rent growth on average.

Indeed, as show in Figure IV-12, many households working in low-wage industries experience cost burden at higher rates than those working in high-income industries. In fact, 42% of households in which the head works in entertainment, recreation, accommodation, or food service are cost burdened (meaning they spend more than 30% of their household income on housing costs). Households in which the head works in public administration, or the military have the lowest rates of cost burden: just 15% of such households pay more than 30% of their income in housing costs.

Figure IV-12.
Cost Burden by Industry, State of Idaho, 2019



Notes: Households are considered cost burdened if their gross rent or total monthly ownership costs are greater than 30% of their household income. Households' industry is determined by the industry of the household head. Unemployed household heads or those out of the labor force are excluded from the data. "Other Services" include automotive repair and maintenance, personal and household goods repair and maintenance, barber shops, beauty salons, laundry services, religious organizations, etc.

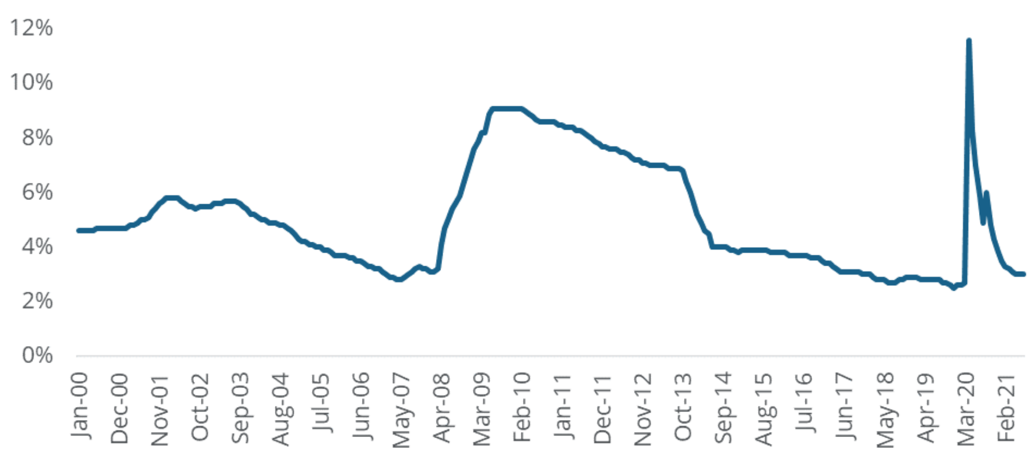
Source: 2019 5-year IPUMS data and Root Policy Research.

High rates of cost burden are costly not only for those experiencing them, but for the state's economy as whole. Estimates using survey-weighted 2019 IPUMS data indicated that, had cost burdened households in Idaho been able to spend just 30% of their incomes in housing costs, this would have freed up about $971,230,300 per year. This money could have otherwise been saved, spent, and invested within Idaho communities.

Unemployment. Idaho's unemployment rate as of July 2021 was a very low 3.0%. This is lower than the national unemployment rate of 5.4% and lower than the unemployment rate in peer states. For instance, the unemployment rate in Nevada in July 2021 was 7.7%. It was 6.1% in Colorado, 5.2% in Wyoming and in Oregon, 5.1% in Washington, 3.6% in Montana, and just 2.6% in Utah.

Employment in Idaho also recovered rapidly from the initial pandemic slump. As shown by the figure below, in March 2020, the unemployment rate in Idaho was 2.7%. The state's unemployment rate hit a peak the following month: in April 2020 the unemployment rate was 11.6%. This was higher than the Great Recession's unemployment rate, which peaked at 9.1% in Idaho in June of 2009. The rate is nearly back down to the level seen before the pandemic and the Great Recession.

Figure IV-13.
Unemployment Rate, State of Idaho, January 2000 to July 2021

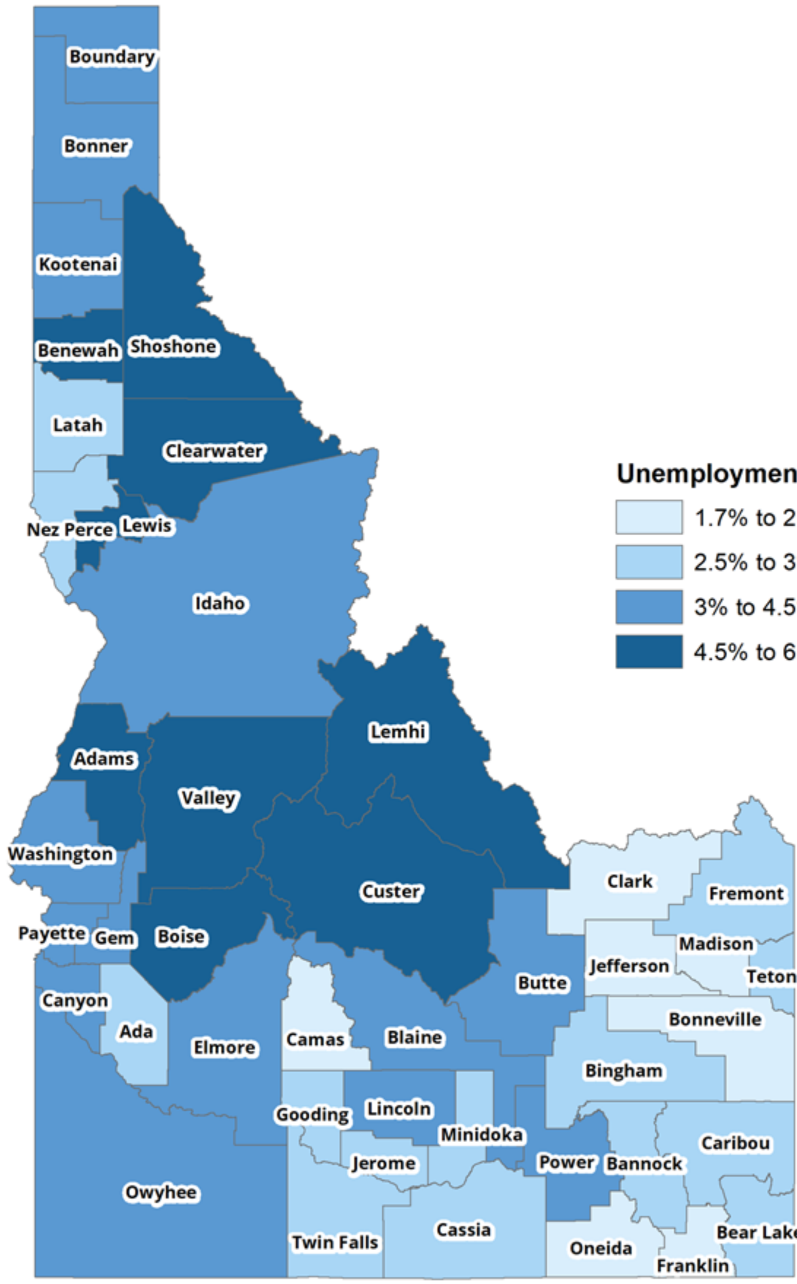


Note: Seasonally adjusted unemployment rate from January 2000 to July 2021.
Source: Bureau of Labor Statistics and Root Policy Research.

Though the statewide unemployment rate is low overall, it is much higher in some counties. For instance, in July 2021, Clearwater (6.3%), Shoshone (6.2%), and Adams (5.9%) counties each had unemployment rates that were nearly double the statewide unemployment rate. Franklin (2.1%) and Madison (1.7%) counties had the lowest unemployment rates in July 2021.

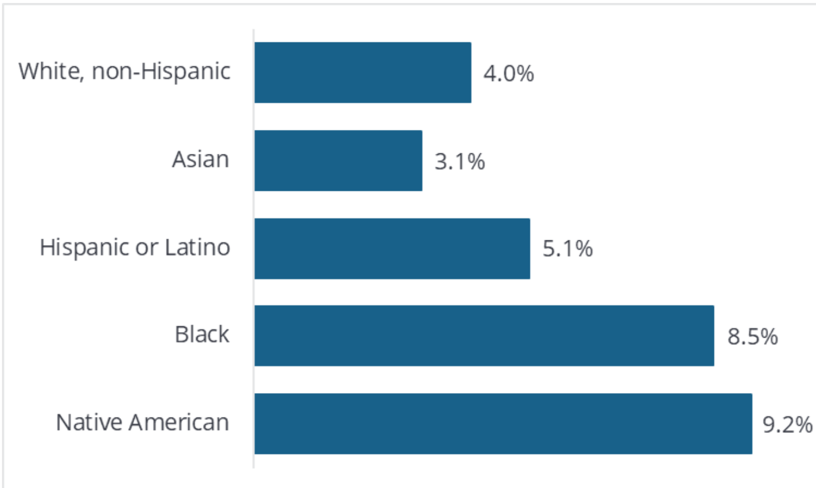
Figure IV-14. Unemployment Rate by County, July 2021

Source:
Idaho Department of Labor and Root Policy Research.



People of color often face higher unemployment rates than White workers because they are employed in industries with more business fluctuation. In 2019 in Idaho, White and Asian workers had unemployment rates at 4% and 3.1% respectively. Hispanic workers had a slightly higher rate at 5.1%. Black and Native American workers are more than twice as likely to be unemployed than White workers, as illustrated in Figure IV-15.

Figure IV-15.
Unemployment Rate by Race and Ethnicity, State of Idaho, 2019

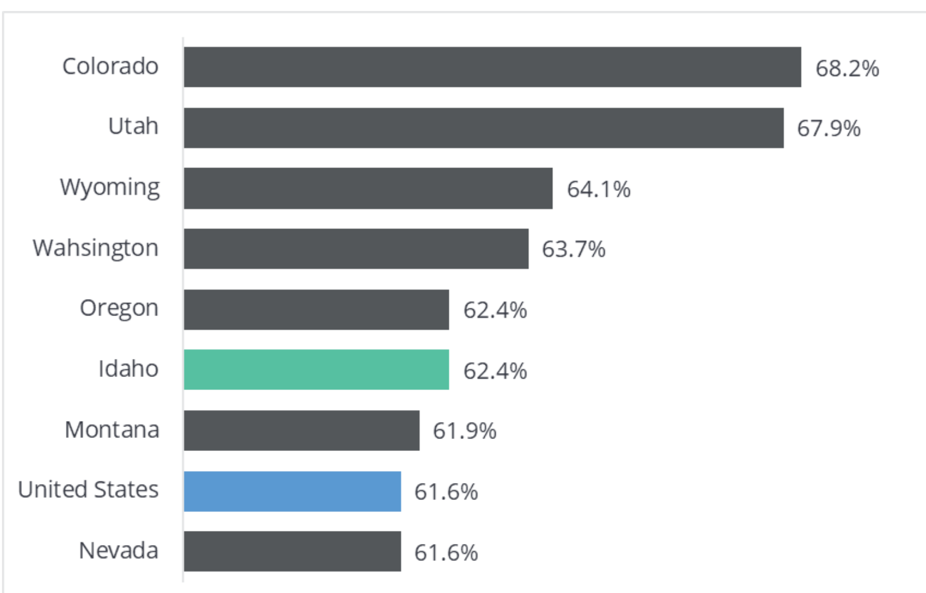


Source: 2019 5-year ACS estimates and Root Policy Research.

Labor force participation. Another measure of workforce conditions is labor force participation. Labor force participation rates measure the percent of individuals over age 15 who are either employed or are actively looking for employment. According to the BLS,

Idaho's labor force participation rate was at 62.4% in September of 2021. This is lower than that of many peer states, as illustrated in Figure IV-16.

Figure IV-16.
Labor Force Participation Rates, State of Idaho and Peer States, 2021

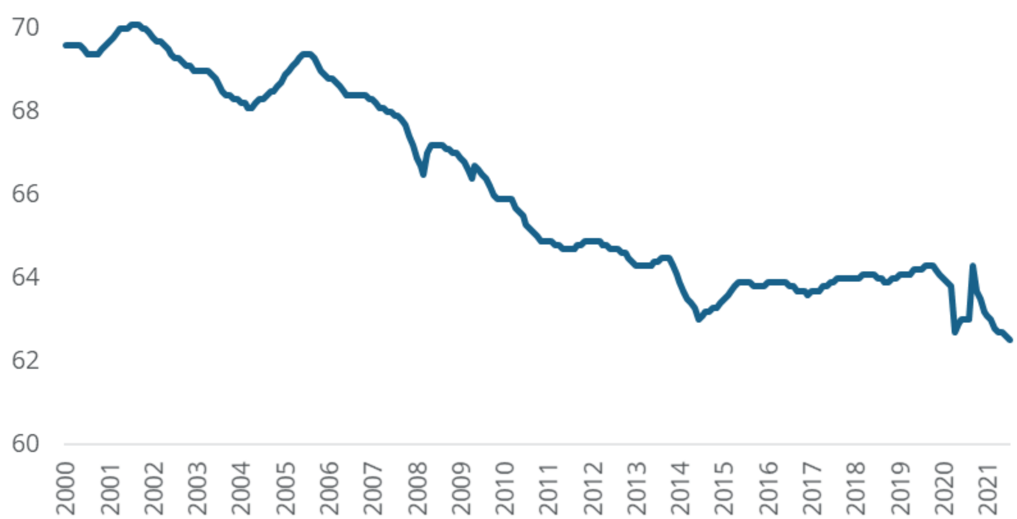


Notes: Labor force participation includes those above age 15 who are employed or who are unemployed and have been actively looking for work in the past four weeks.

Source: Bureau of Labor Statistics and Root Policy Research.

As shown in Figure IV-17, labor force participation in Idaho has decreased since the early 2000s—when it peaked around 70%. Declining and low labor force participation is a concern because it can limit economic growth—as well as increase housing needs. Maximizing the number of people in a household participate in the labor force an mitigate the need to provide housing for new workers.

Figure IV-17.
Labor Force Participation Rate, State of Idaho, 2020-2021



Notes: Labor force participation includes those above age 15 who are employed or who are unemployed and have been actively looking for work in the past four weeks.

Source: Bureau of Labor Statistics and Root Policy Research.

This trend is occurring nationwide. Many scholars point to declining physical and mental health including increased rates of disability and drug use.[4] Idahoans with disabilities are no exception and tend to have lower labor force participation rates: 31% of working-age people with disabilities were employed or looking for a job compared to 63% of the working-age population overall. Labor force participation rates are lower for those with cognitive difficulties and ambulatory difficulties compared to those with vision and hearing difficulties in Idaho. Differences in labor force participation rates largely have to do with access to the labor market, including via housing and transportation. Some people with

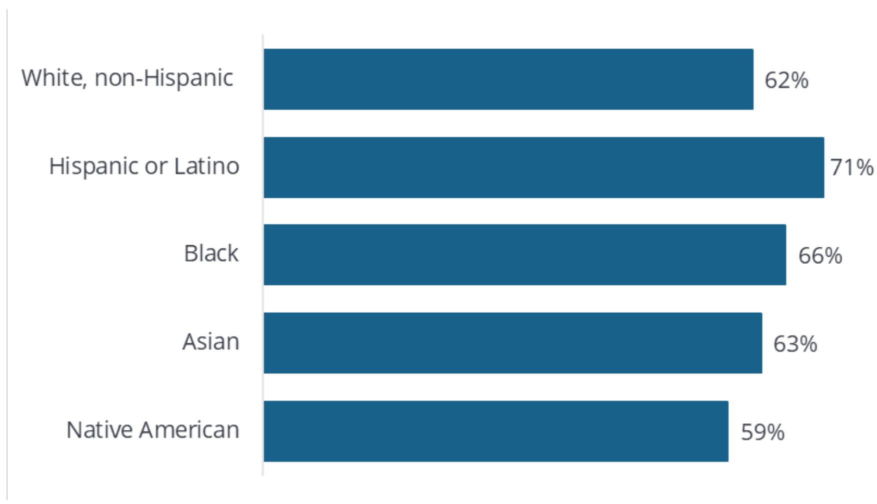
[4] Krueger, Alan B. "Where have all the workers gone? An inquiry into the decline of the US labor force participation rate." Brookings papers on economic activity 2017.2 (2017): 1.

disabilities who are out of the labor force might otherwise be in the labor force if accessible and reliable transportation and housing were easier to obtain.[5]

Others point to technological change making certain jobs obsolete and discouraging less educated workers from reentering the workforce. Some also find that workers born in the U.S. have higher reservation wages compared to immigrant workers, meaning native-born U.S. workers refuse to work below a certain wage rate.[6] There is evidence of this in Idaho: According to the Idaho Commission on Hispanic Affairs, Idaho's workers who identify as Hispanic are more likely than non-Hispanics to be in the labor force (70% vs. 61% in 2018, respectively).[7]

Labor force participation rates are higher among certain populations and in various regions throughout the state. Statewide, labor force participation rates were highest among individuals with Hispanic origins (71%). Black individuals also had relatively high labor force participation rates (66%) compared to non-Hispanic White individuals (62%). Women had lower labor force participation rates than men, and the drivers of this difference are discussed in the following sections.

Figure IV-18.
Labor Force Participation Rates by Race and Ethnicity, State of Idaho, 2019



Note: Labor force participation rates for population aged 16 and older.

Source: 2019 5-year ACS estimates and Root Policy Research.

[5] Lubin, Andrea, and Devajyoti Deka. "Role of public transportation as job access mode: Lessons from survey of people with disabilities in New Jersey." *Transportation research record* 2277.1 (2012): 90-97.

[6] Krause, Eleanor, and Isabel Sawhill. "What we know and don't know about declining labor force participation: a review." Center on Children and Families, Brookings Institution, Washington, DC (2017).

[7] Idaho Commission on Hispanic Affairs, "The Hispanic Profile Data Book for Idaho, 5th Edition," 2021.

As illustrated in Figure IV-19, in 2019, labor force participation rates were highest in Teton and Blaine Counties (70%) closely followed by Jefferson, Lincoln, and Jerome Counties (67%). The lowest labor force participation rates were in Clearwater (41%), Custer (42%), Idaho (49%), Butte (49%), and Boise (49%) counties.

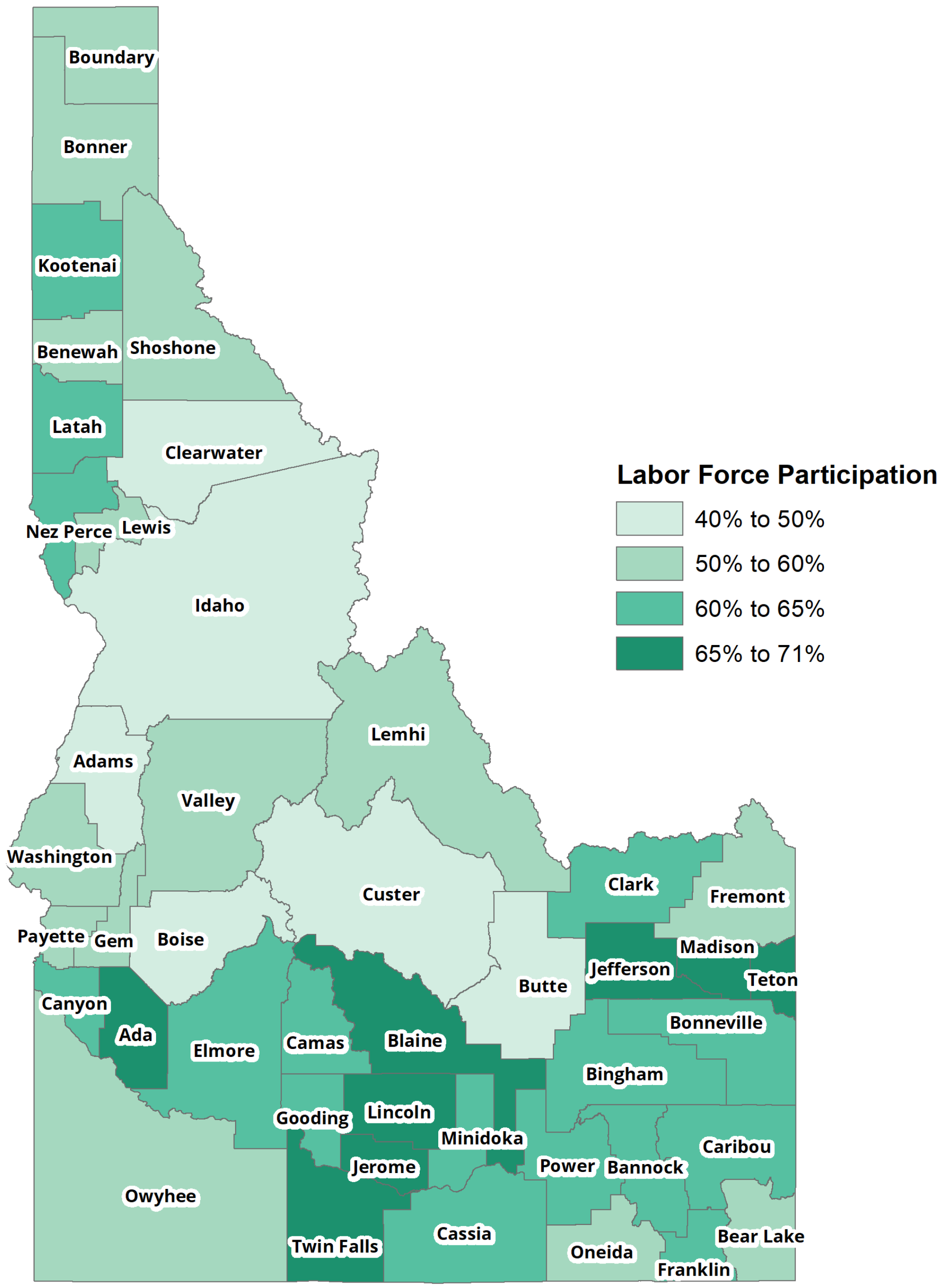
Figure IV-19. Labor Force Participation Rates by County, 2019

Note:

Labor force participation rates for population aged 16 and older.

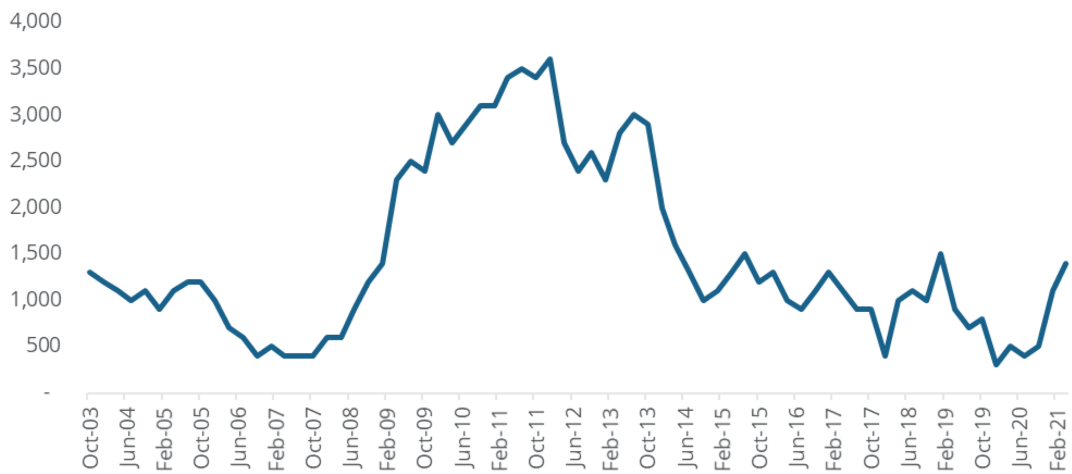
Source:

2019 5-year ACS estimates and Root Policy Research.



The BLS also documents data on discouraged workers. Discouraged workers are those who are not working, and would like to, and have looked for a job sometime in the prior 12 months. Discouraged workers are *not* counted as unemployed because they are not actively looking for work. This means that, because they are not working and not actively looking for a job, they are typically considered out of the labor force. Figure IV-20 illustrates that the number of discouraged workers has certainly decreased since the Great Recession and its aftermath, but is starting to increase again. In April of 2021, there were 1,400 discouraged workers in the state.

Figure IV-20.
Discouraged Workers, State of Idaho, 2003 to 2021



Source: Bureau of Labor Statistics and Root Policy Research.

The BLS also offers data on individuals who were employed but were only employed part time when they'd prefer to be employed full time. In 2020, there were 37,100 Idaho workers who were considered involuntarily part-time workers. This is an increase of 66% from 2019, where just 22,400 were involuntarily part-time workers.

Altogether in 2020, there were 46,200 unemployed Idahoans, 37,100 involuntarily part time workers, 1,400 discouraged workers—for a total of 84,700 Idahoans who could more actively participate in the state's economy. The potential reasons these potential workers are un- and under-employed are explored in the balance of this report.

Access to Work

This section examines barriers to work and economic productivity. Access to high-speed internet, childcare, education, healthcare, and a healthy environment are each important components to labor force participation and business formation—and critical to Idaho's continued economic success.

Internet, innovation, and productivity. Although it is not explicitly addressed in the fair housing guides[8], access to high-speed Internet creates employment and education opportunities that otherwise would not be possible. This is especially true in communities

[8] Current guides were developed before the Internet was a normal component of work.

that do not have access to postsecondary education and in communities that seek to grow or strengthen their economic base. Recent studies have found that broadband access increases rates of firm start-ups, particularly in rural areas and especially among women entrepreneurs in rural areas.[9]

According to 5-year 2019 ACS data, 8% of Idahoan households do not own a computer, including a smartphone or tablet. This is slightly higher than the national average of 7%. Additionally, 17% of Idaho households do not have an internet subscription, which is substantially higher than the U.S. average of 13% of households.

Limited access to the Internet is much more prevalent among lower income households in Idaho:

- 39% of Idaho households with an income less than $20,000 do not have an internet subscription.
- This compares with 18% of households with incomes between $20,000 and $74,999, and just 6% of households with income, above $75,000.

Access to computers and internet also varies by county. The counties with the lowest access to computers and internet include Clark, Lewis, and Idaho: 21% of households in Clark County, 20% of households in Lewis County, and 18% of households in Idaho County do not own a computer.

In contrast, households in Madison, Jefferson, Oneida, Velley, and Latah Counties were most likely to own computers. Just 3% of households in Madison County did not own a computer compared to 5% in Jefferson, Oneida, and Valley counties, and 6% in Latah and Bonneville.

[9] Conroy, Tessa, and Sarah A. Low. "Entrepreneurship, Broadband, and Gender: Evidence from Establishment Births in Rural America." International Regional Science Review (2021): 01600176211018749.

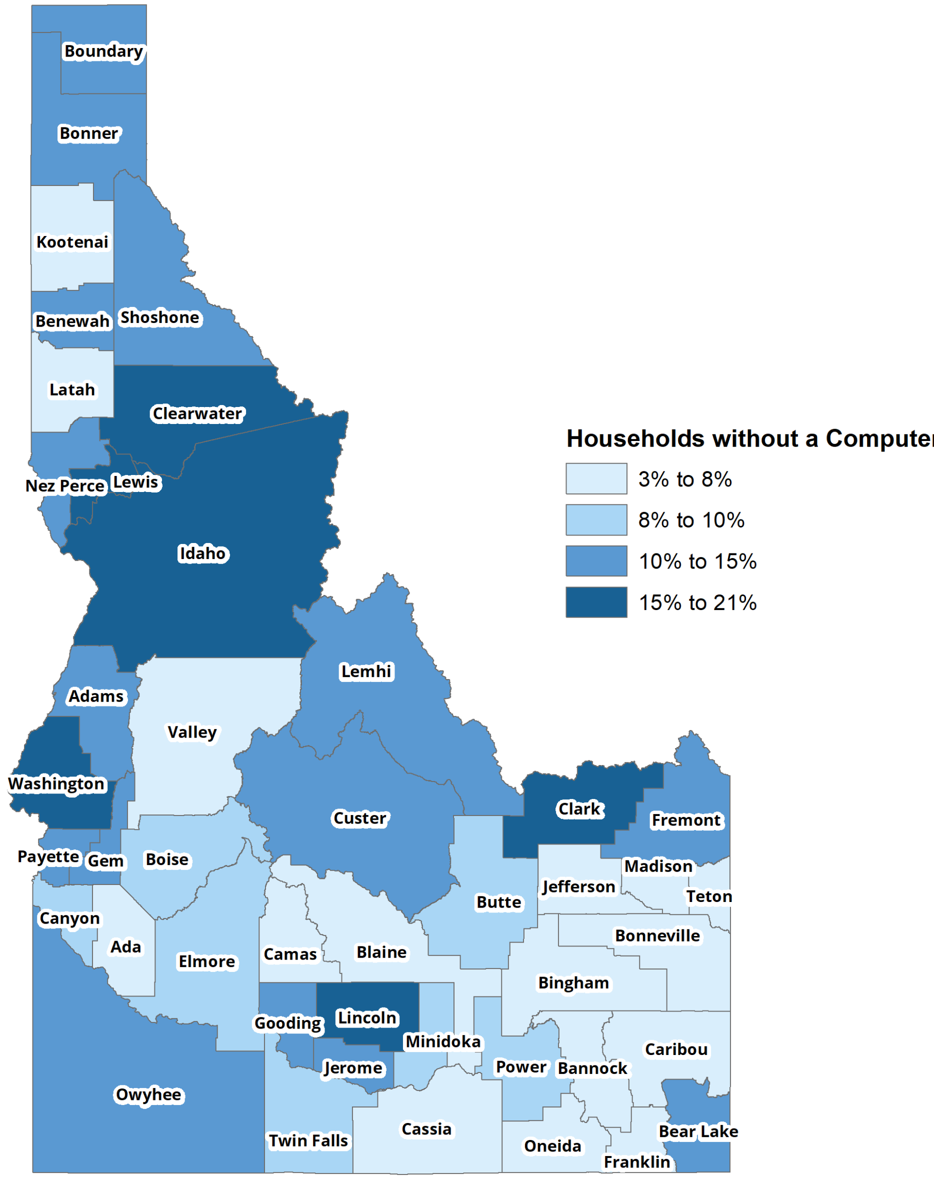
Figure IV-21. Households without Computers by County, 2019

Note:

Computer ownership includes desktop, laptop, smartphone, or tablet.

Source:

2019 5-year ACS estimates and Root Policy Research.



Not surprisingly, many of the same counties in which households did not own computers also have a high proportion of households without access to internet. Less than 73% of households in Lewis, Clark, Idaho, Lincoln, Benewah, Shoshone, and Camas Counties have internet subscriptions. Blaine, Caribou, Oneida, Bonneville, and Teton Counties each had rates of internet subscription at 87% of households or higher.

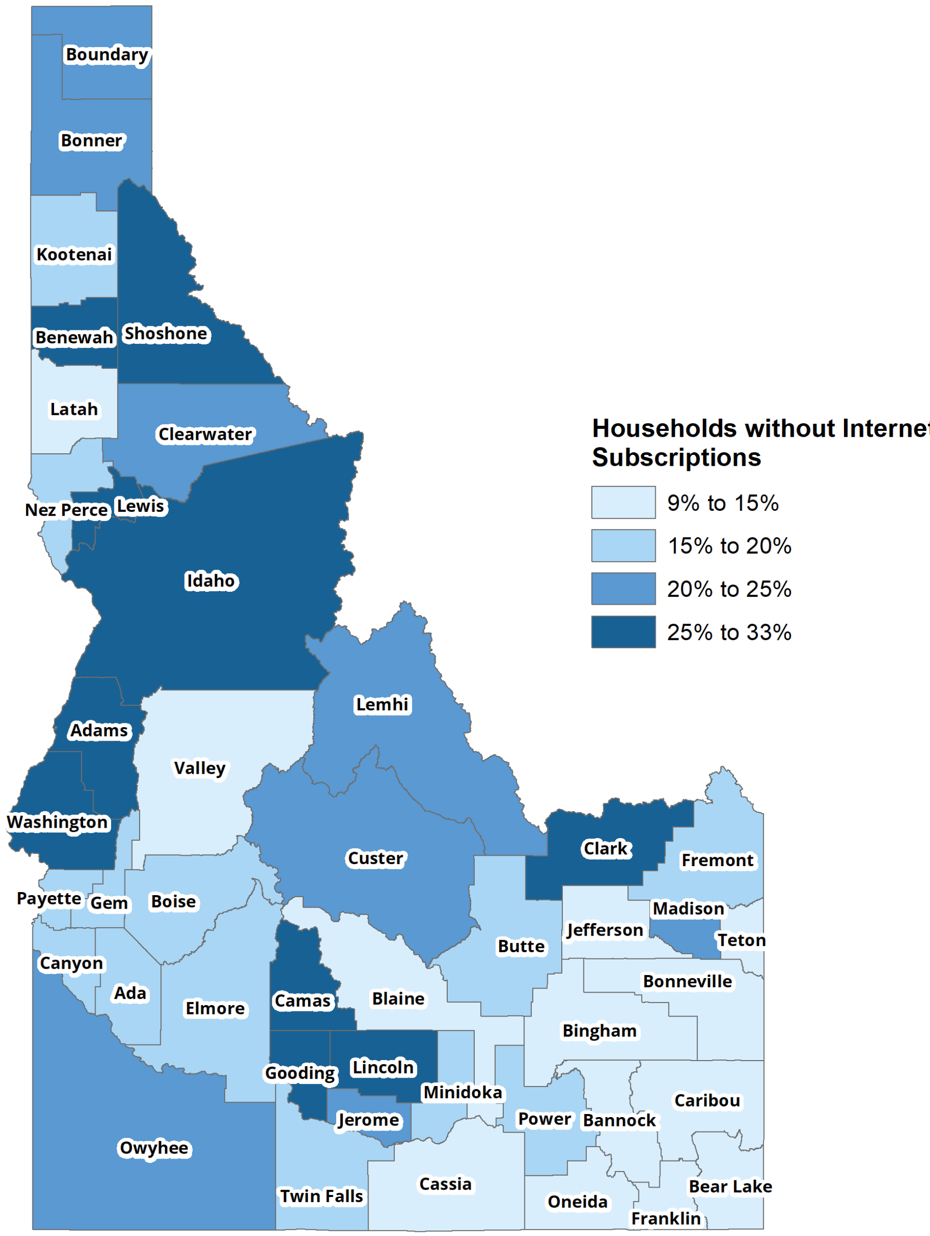
Figure IV-22. Households without an Internet Subscription by County, 2019

Note:

An internet subscription includes dial-up, broadband, cellular data plan, cable, fiber optic, DSL, or satellite internet service.

Source:

2019 5-year ACS estimates and Root Policy Research.



Among households that do have an internet subscription, many do not have access to internet speeds that are reliable and conducive to work, particularly in a work-from-home environment. The Federal Communications Commission (FCC) estimates the percent of people per county with access to fixed terrestrial broadband. The most recent estimates (end of 2019) are included in Figure IV-22.

Lewis County had the lowest proportion of residents with access to high-speed internet in 2019, with just 29% living in an area where they could get high-speed internet. Lemhi, Adams, and Clearwater Counties each had between 50% and 60% accessibility. Nearly all households (99% or more) in Madison, Ada, Jerome, Bonner, Minidoka, and Canyon Counties lived in an area providing high-speed internet. In Southern Idaho, the counties with the highest broadband availability are generally those that include or are in close proximity to major highways.

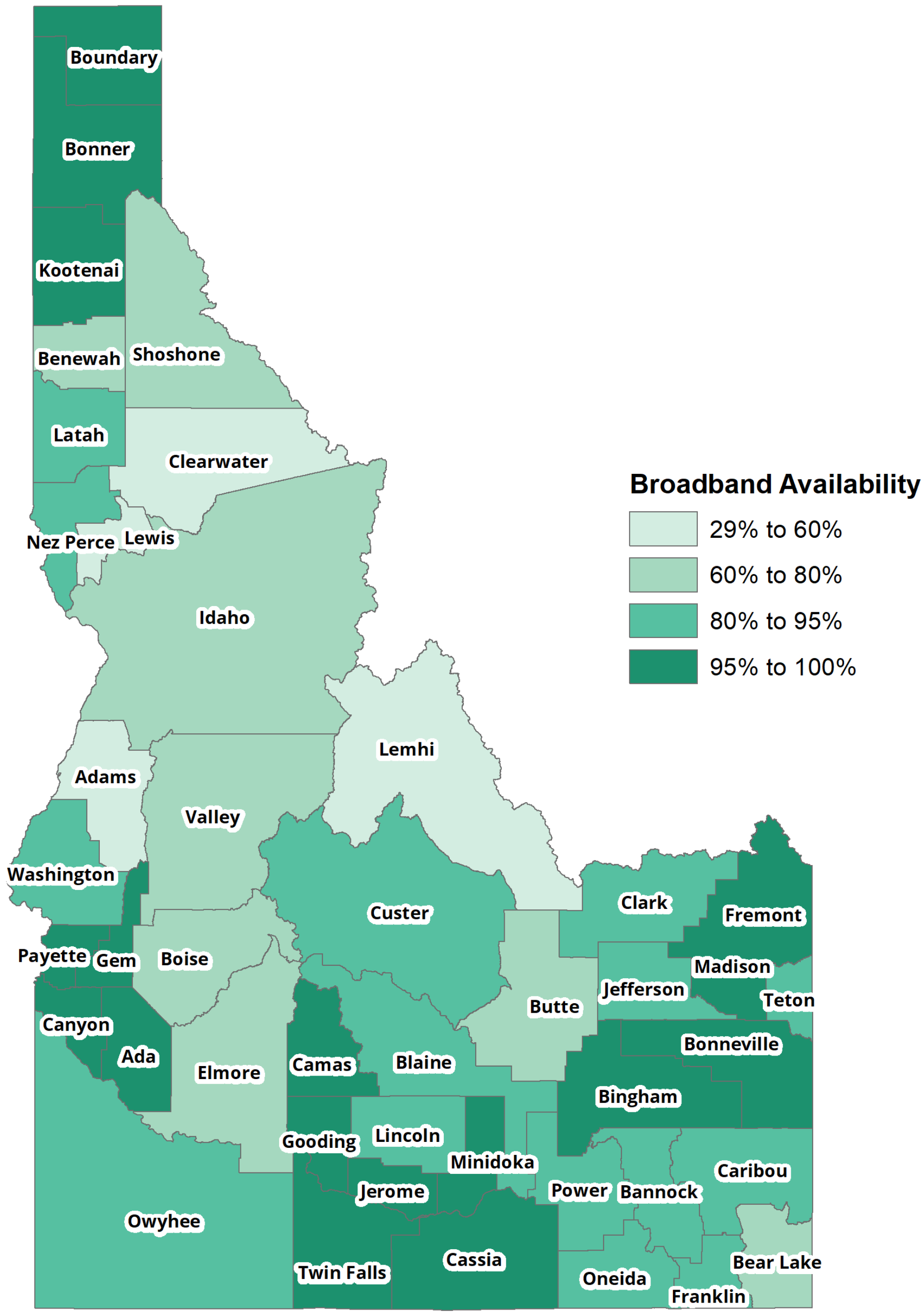
Figure IV-23. High-speed Broadband Availability by County, December 2019

Note:

Data as of December 2019. High speed defined here as greater than or equal to 25/3 Mbps.

Source:

Federal Communications Commission data from Form 477 and Root Policy Research.



These FCC data ultimately come from providers and do not precisely capture the internet speeds households are actually experiencing—or if they are taking advantage of high-speed access. Microsoft is able to track download speeds by machine and link IP addresses to zip codes. With this data, they estimate the percent of people per county that are actually able to use the internet at broadband speeds greater than or equal to 25/3Mbps or greater. These public-use data are from October 2020 and are presented below in Figure IV-24.

Across the board, high-speed broadband *usage* as measured by Microsoft is much lower than availability described by the FCC. For instance, in Camas County, where the FCC estimates 98% of individuals live in a place that offers high speeds, less than 2% of individuals are actually using high speed internet. Other counties where less than 10% of individuals were using high speeds included Lewis, Benewah, Adams, Shoshone, and Boise Counties. These trends may be partly attributable to bad routers or slow processors, which can slow speeds and have nothing to do with the underlying connection. However, they may also be due to issues of affordability: some households are unable to afford fast connections even when offered. A recent study also cites digital illiteracy and device costs as barriers to broadband adoption.[10]

The highest usage rates of high-speed internet were in Nez Perce County, where 87% of individuals were using high-speeds, and in Ada County where 86% of individuals where are using high speeds.

[10] Brake, D., & Bruer, A. (2021). Broadband Myths: Are High Broadband Prices Holding Back Adoption?. Information Technology and Innovation Foundation.

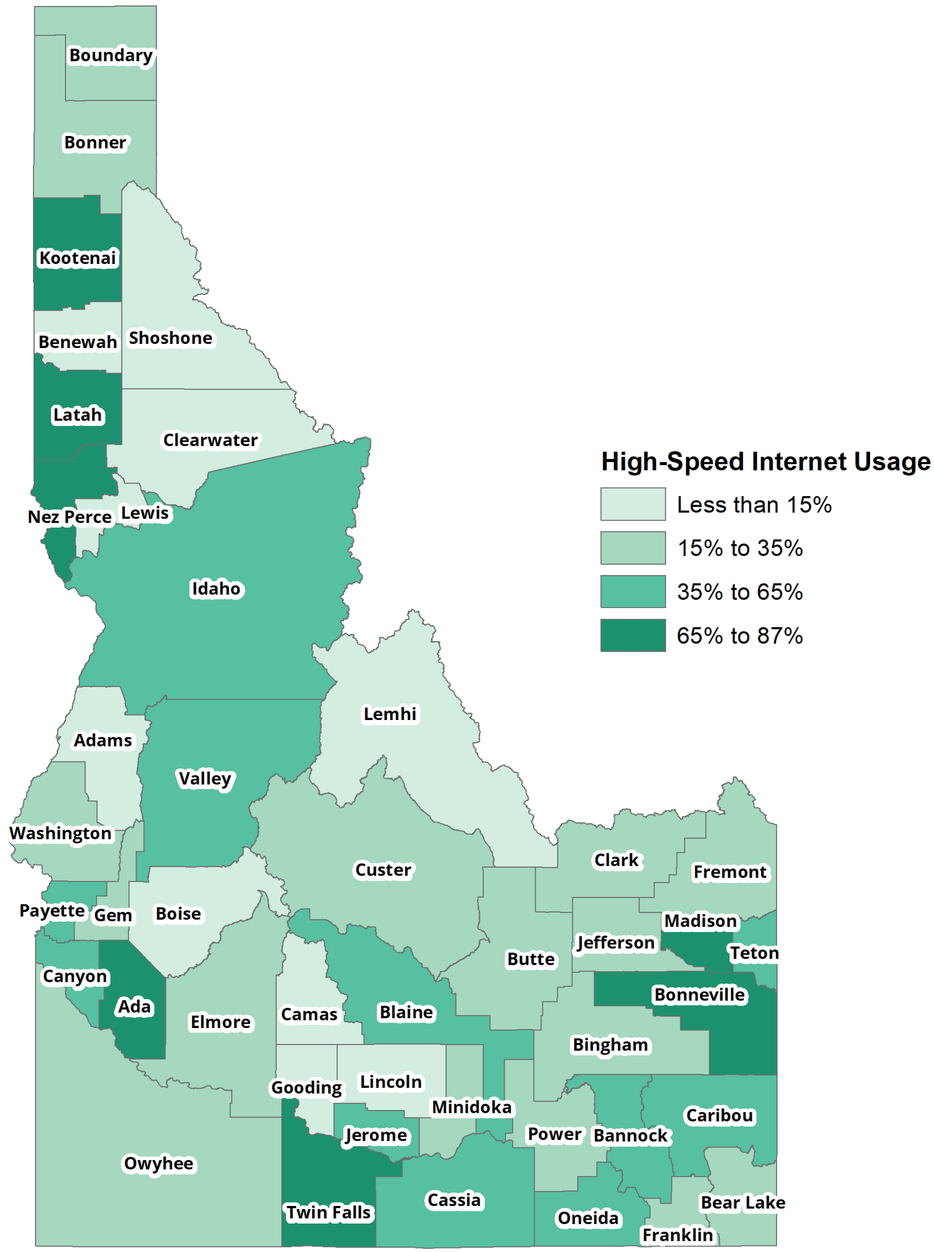
Figure IV-24. High-speed Internet Usage by County, October 2020

Note:

Data as of October 2020

Source:

United States Broadband Usage Percentages Dataset from Microsoft Open Source and Root Policy Research.



Education and training. Publicly supported education and training are key building blocks for a well-functioning economy. A population that is better educated has less unemployment, reduced dependence on public assistance programs, and generates greater tax revenue.[11] Public schools have also played an important part in closing the gap between wealthy and poor students on measures of intelligence, which helps reduce

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[11] Wolfe, B.L. and R.H. Haveman, Social and Nonmarket Benefits from Education in an Advanced Economy. 2002, Federal Reserve Bank of Boston: Boston, MA.

income inequality.[12] A highly educated populous is also typically better protected against economic recessions and depressions.[13]

Educational policies at the state level are set by the Idaho State Board of Education. The Board of Education's mission is to "provide leadership, set policy, and advocate for transforming Idaho's educational system to improve each Idaho citizen's quality of life and enhance the state's global competitiveness."

The Board's FY2017-2021 Strategic Plan Goal 1 emphasizes the importance of equity in education: A Well Educated Citizenry has as its first objective to "set policy and advocate for increasing access to Idaho's educational system for all Idahoans, regardless of socioeconomic status, age, or geographic location" through increasing the number and dollar amount of state-funded scholarships; reducing the proportion of graduates with debt; increased high school student participation in dual credit and advanced placement programs; increasing the proportion of high school graduates pursuing postsecondary education; and reducing the gap in access measures between traditionally underrepresented populations and the general population.

School choice. Public education in Idaho is delivered by more than 140 school districts led by the State Department of Education and the Board of Education. Idaho statutes allow for delivery of public education by five methods of education in addition to traditional public schools: charter schools, alternative schools, magnet schools, home schooling, and private schools.

- The legislature passed the Idaho Charter School Law in 1998. As of the 2020-21 school year, there were 66 brick and mortar and nine virtual charter schools operated across the state.

- The 60 alternative schools operating in Idaho are designed to help at-risk youth earn high school diplomas. State statute allows students in grades six through 12 to enroll in alternative schools, although the actual grades served are determined locally.

Twenty-four magnet schools operate in Idaho: six are arts-focused, 14 are STEM or computer science programs, three are language focused, and one is an International Baccalaureate program. Idaho has open enrollment programs for transfers both within and between school districts. However, a school district's board of trustees may opt out of the open enrollment program or may adopt standards regarding the capacity of a program.

[12] Alexander, K., Public Education and the Public Good. 1997, Social Forces. 76(1): p. 1-30.

[13] Surn, Andrew, and Ishwar Khatiwada. "The Nation's Underemployed in the Great Recession of 2007-09." Monthly Lab. Rev. 133 (2010): 3.

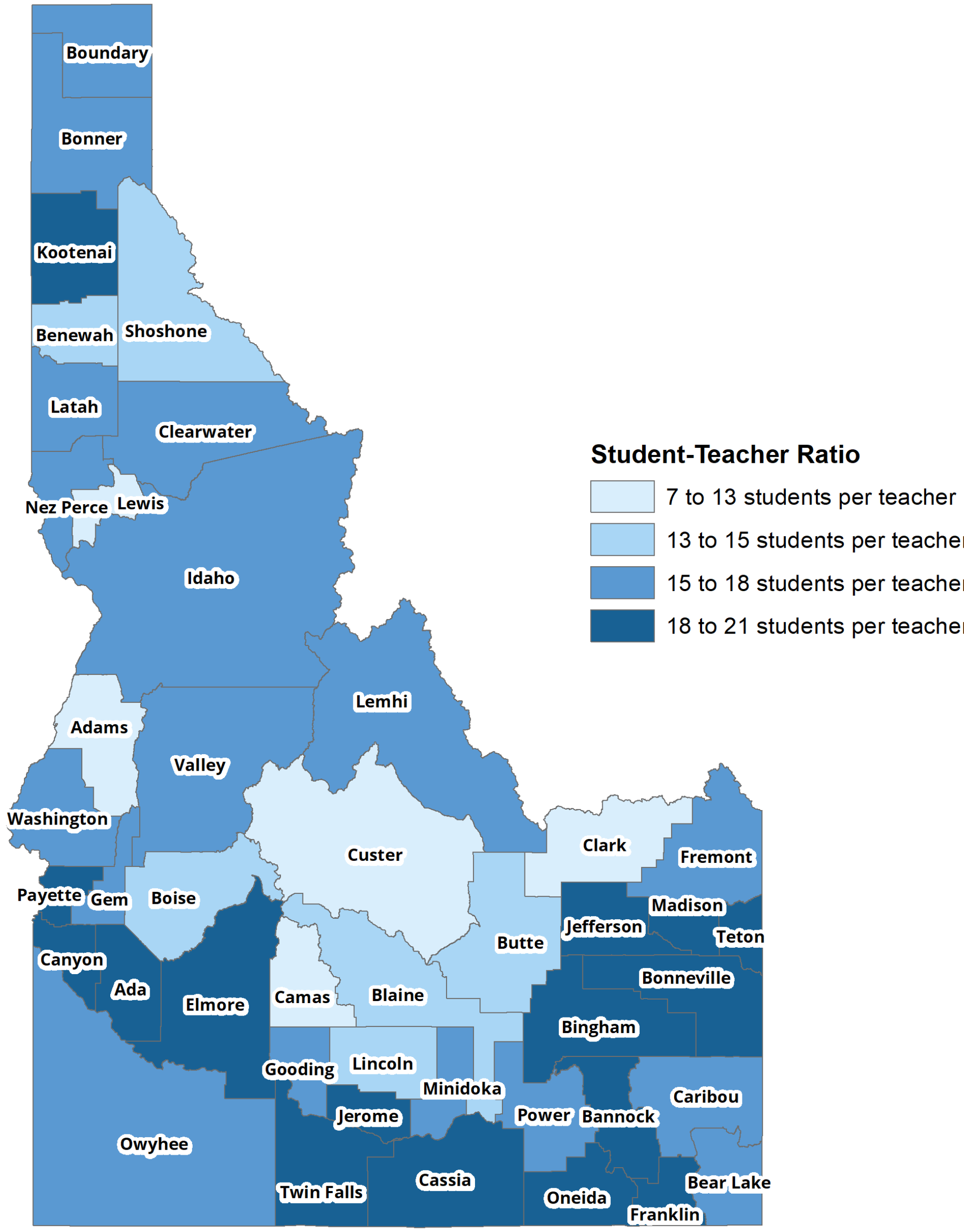
School quality. Student-teacher ratios are often used to understand the ability of schools to provide individualized attention to pupils. According to data from the National Center for Education Statistics, the statewide student-teacher ratio in public schools in Idaho during the 2019-2020 school year was 18:1. This is high compared to the rest of the country: Idaho has the 45th highest student-teacher ratio in the county. Some neighboring states like Nevada, Oregon, Utah, and Washington had even higher student-teacher ratios: Nevada's and Oregon's were 20:1, Utah's was 23:1 and Washington's was 18:1 in the 2019-2020 school year. Other peer states had lower student-teacher ratios. Namely, Colorado (17:1), Montana (14:1), and Wyoming (13:1).

Student-teacher ratios vary within Idaho. As illustrated in Figure IV-25, Bannock, Jefferson, Madison, Oneida, Franklin, and Bonneville teachers were relatively more strained, with student-teach ratios greater than 20:1. Student-teacher ratios where lowest in Clark (8:1), Camas (11:1), Adams (12:1), and Lewis (12:1) Counties.

Figure IV-25. Student-Teacher Ratios by County, 2019-2020

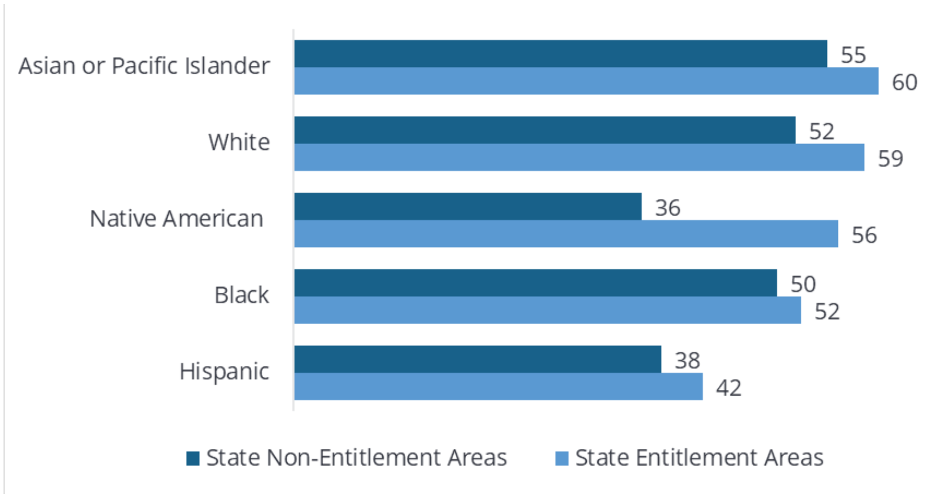
Source:

National Center for Education Statistics and Root Policy Research.



Access to high-quality schools vary by race and ethnicity. HUD's AFFH data indicate school proficiency indices for students of numerous race and ethnic groups. According to these data in 2020, White and Asian Idahoans were more likely to live in areas with higher proficiency scores than Native American, Black, and Hispanic Idahoans. Figure IV-26 illustrates school proficiency indices for each demographic group in both state entitlement areas and in non-entitlement areas.

Figure IV-26.
School Proficiency by Entitlement Area and Race/Ethnicity, State of Idaho, 2020



Source: HUD AFFH data and Root Policy Research.

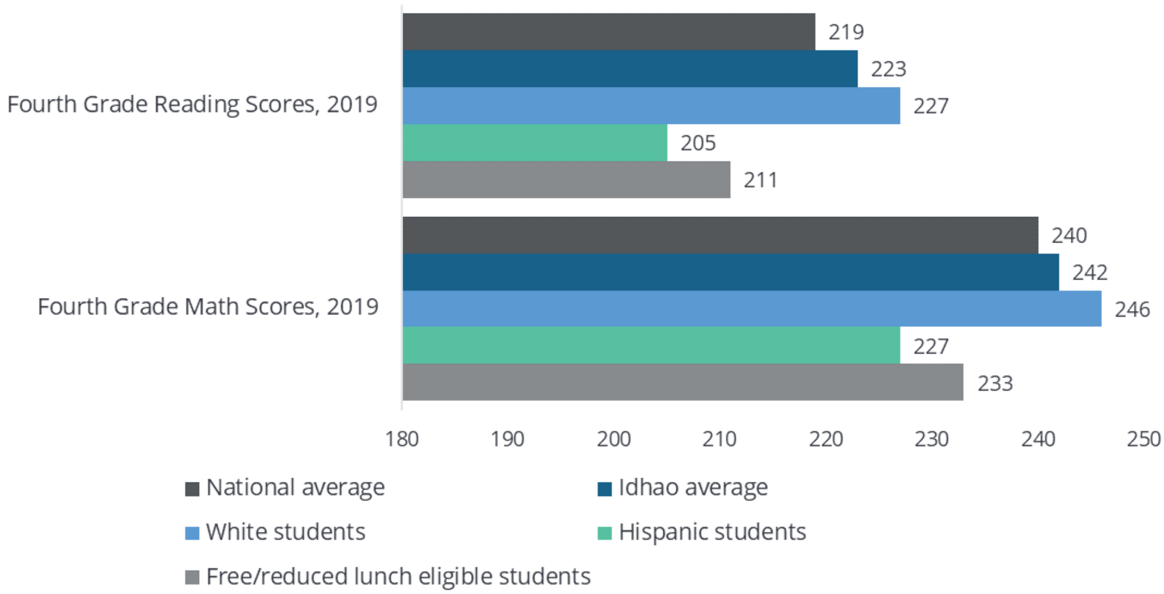
Student outcomes. By several measures, Idaho's students are on par with students around the county. In 2019, Kids Count data from the Annie Casey Foundation estimated that 63% of fourth graders in Idaho were not proficient in reading compared to 66% nationwide. Idaho fourth graders scored a 223 on average in 2019: higher than those in Washington (220), Oregon (218), Nevada (218), and Montana (222), but lower than those in Wyoming (227) and Utah (225). The fourth grade reading score in Idaho was 4 points higher than the national average.

Idaho's fourth graders had both reading and mathematics higher than the national average in 2019. The average mathematics scores for fourth graders in Idaho was 242, two points higher than the national average of 240. Idaho fourth graders also scored higher in math than many surrounding states. The average math scores in Montana (241), Washington (240), Oregon (236), and Nevada (236) were each slightly lower than Idaho's. However, Wyoming (246) and Utah (244) fourth graders scored higher in math than Idaho fourth graders in 2019. The Annie Casey Foundation also estimated that 63% of Idaho's eighth graders are not proficient in math compared to 67% of students nationwide.

In Idaho, gaps in proficiency exist between all students and: students of color, students from lower income households, students with disabilities, and students with limited English proficiency (LEP).

As illustrated in Figure IV-27, however, this was not true of all groups of Idaho's children. For instance, Hispanic students and students who qualified for free or reduced lunch had scores lower than the state and national average.

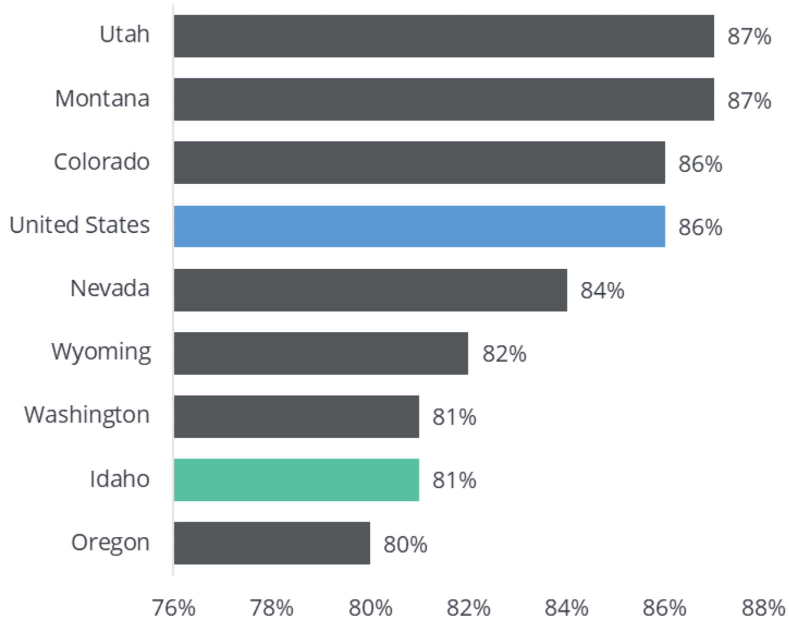
Figure IV-27.
Fourth Grade Testing Scores by Race and Ethnicity, State of Idaho, 2019



Source: The Nation's Report Card and Root Policy Research.

According to the National Center for Education Statistics, Idaho's statewide high school graduation rate in the 2018-2019 academic year was 81%, lower than the US average of 86% and lower than most of Idaho's neighboring states, as illustrated in Figure IV-28.

Figure IV-28.
High School Graduation Rates, State of Idaho and Peer States, 2019



Note: For the 2018-2019 academic year

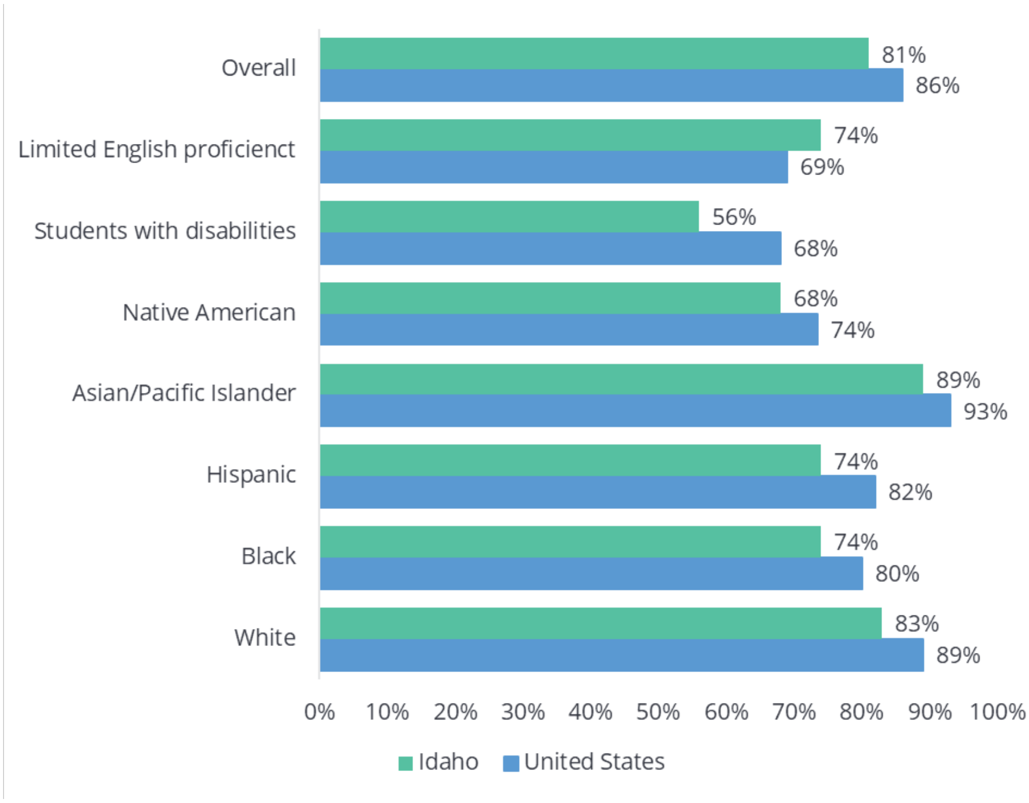
Source: National Center for Education Statistics and Root Policy Research.

This is an improvement from 2013-2014, where the graduation rate in Idaho was 77%. However, as shown in Figure IV-28, graduation rates look different for different types of students.

For example, high school graduation rates for students with disabilities in Idaho is just 59%, 8 percentage points lower than the national average. The high school graduation rate for Native Americans in Idaho is much lower than Native American students nationally at just 61% compared to 74% nationwide.

Idaho does better than the national average in graduating students with limited English proficiency (LEP): in Idaho, 76% graduate high school compared to 68% nationwide. This is the only group where Idaho exceeds the national proportion; for all other groups, Idaho lags the graduation rate nationally.

Figure IV-29.
High School Graduation Rates, State of Idaho, 2019



Note: For the 2018-2019 academic year

Source: National Center for Education Statistics and Root Policy Research.

Overall, 91% of Idahoans over age 25 have a high school diploma. This is higher than the national average of 88%. However, just 28% of Idahoans over 25 have a bachelor's degree compared to 32% nationwide.

Educational attainment rates differ by county, as illustrated in Figure IV-30. Clark County had the lowest percent of its over-25 population with a high school diploma, with just 60%. On the other end of the spectrum, nearly 96% of residents in Madison and Latah Counties had a high school diploma. Both Madison and Latah Counties have relatively large college-student populations, which drives these above-average proportions.

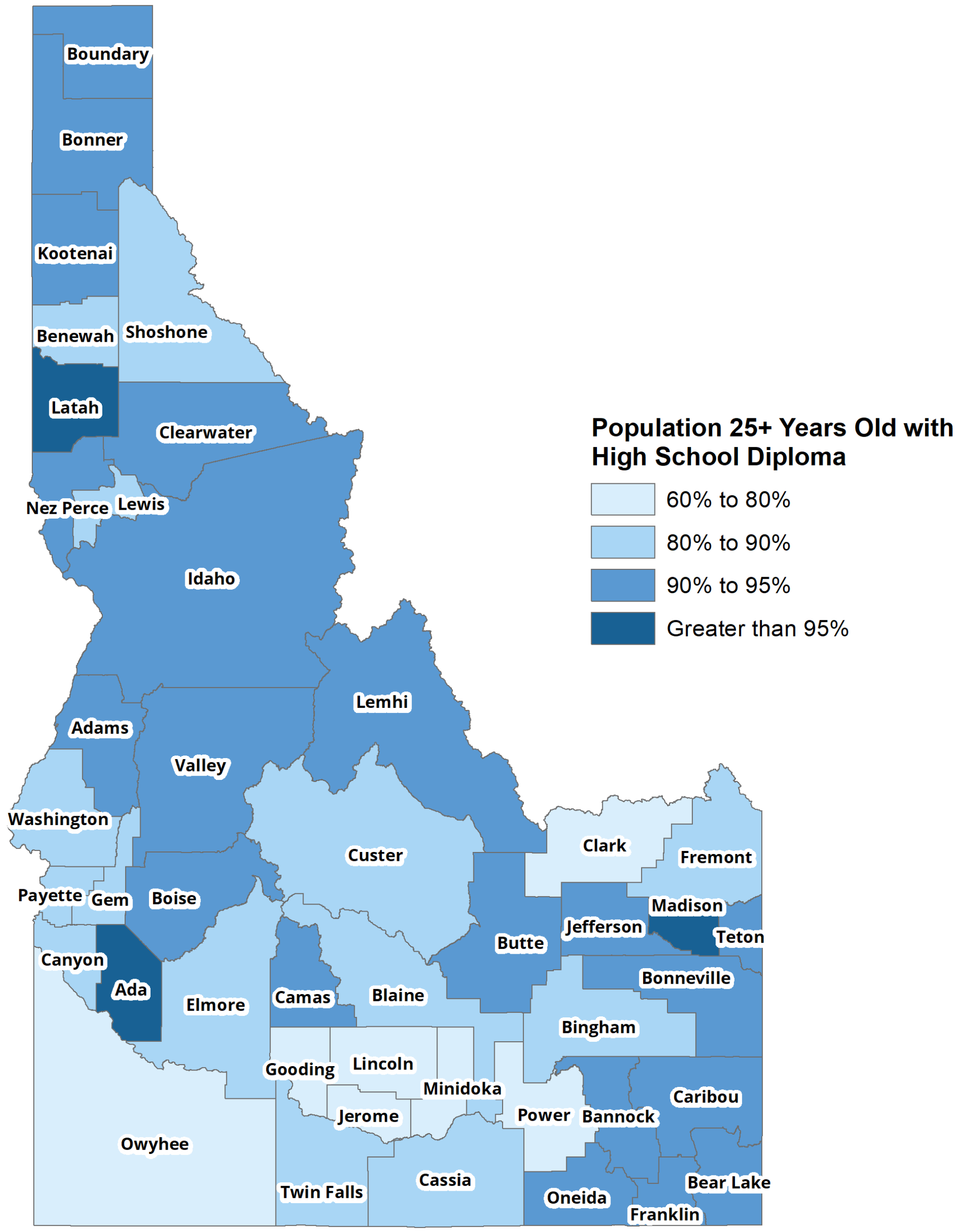
Figure IV-30. Percent of Population with a High School Diploma by County, 2019

Note:

Restricted to individuals aged 25 and older.

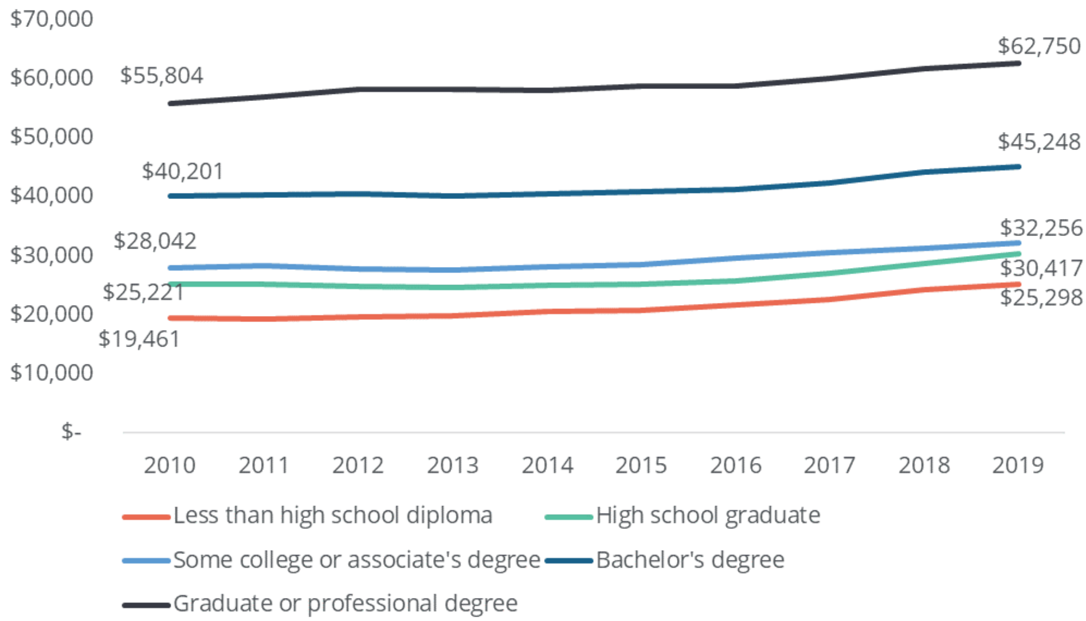
Source:

2019 5-year ACS estimates and Root Policy Research.



On average, those with a post-secondary degree have much higher earnings that those without. In Idaho, those with a bachelor's degree earn $17,500 more on average than those with a high school diploma.

Figure IV-31.
Annual Earnings by Educational Attainment, State of Idaho, 2010 to 2019



Note: Restricted to individuals earning a wage, aged 25 and older.

Source: 2019 5-year ACS estimates and Root Policy Research.

Access to postsecondary and vocational education. Idaho's public colleges and universities and community college/vocational school provide opportunities for residents to continue their education in a variety of academic and technical pursuits both on campus and virtually. In addition to having among the highest high school graduation rates in the state, Latah County also had the highest share of the over-25 population with a bachelor's degree at 45%. Driven by individuals associated with the University of Idaho, Latah County also has a high proportion of individuals with post-graduate degrees: 20% of its over-25 population has a graduate degree compared to just 9% statewide. Teton and Ada Counties led the state, however, at 41% and 39%, respectively. Lincoln, Shoshone, and Owyhee counties had the lowest proportions of individuals with bachelor's degrees, each with less than 12%.

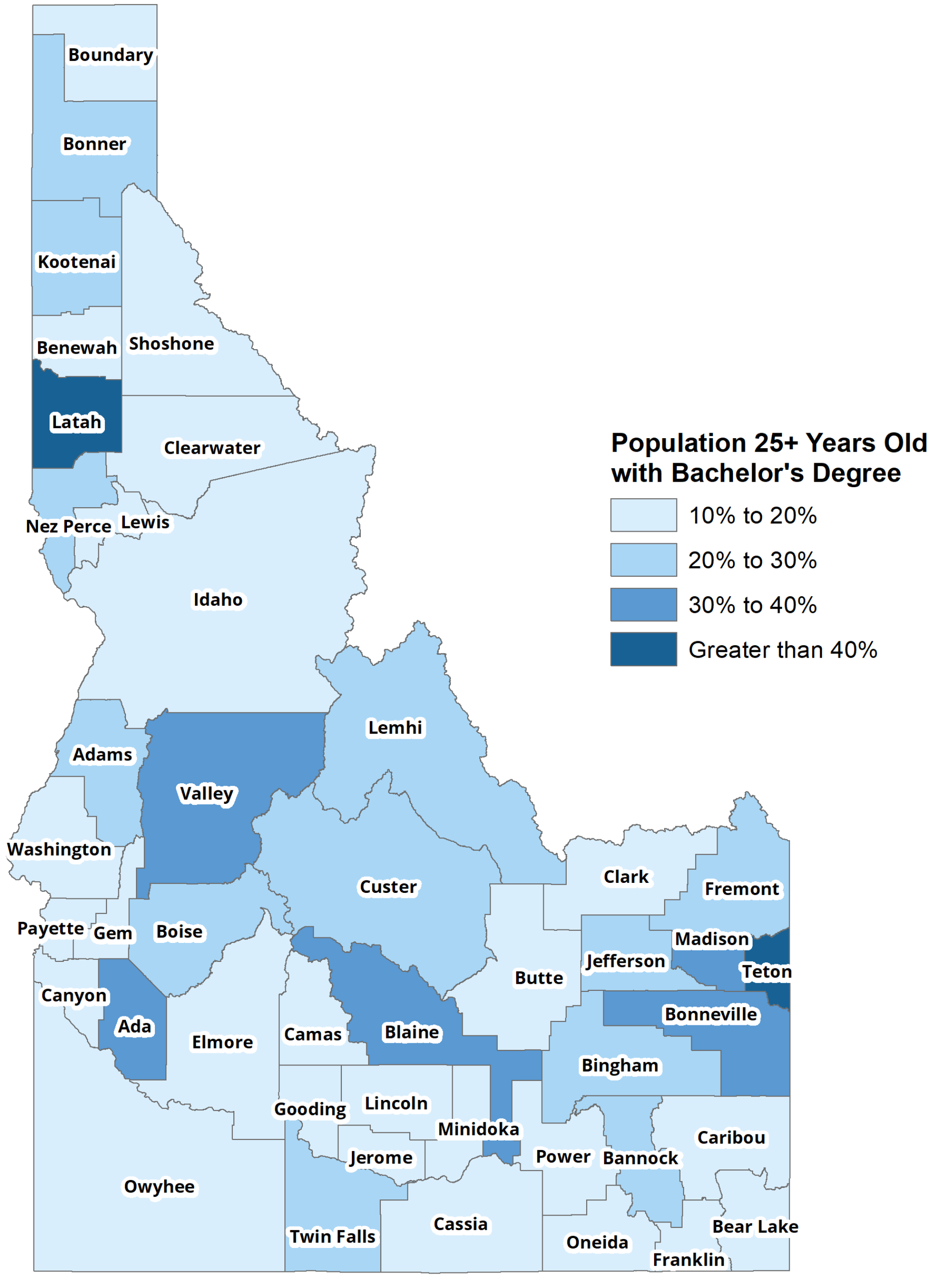
Figure IV-32. Percent of Population with a Bachelor's Degree by County, 2019

Note:

Restricted to individuals aged 25 and older.

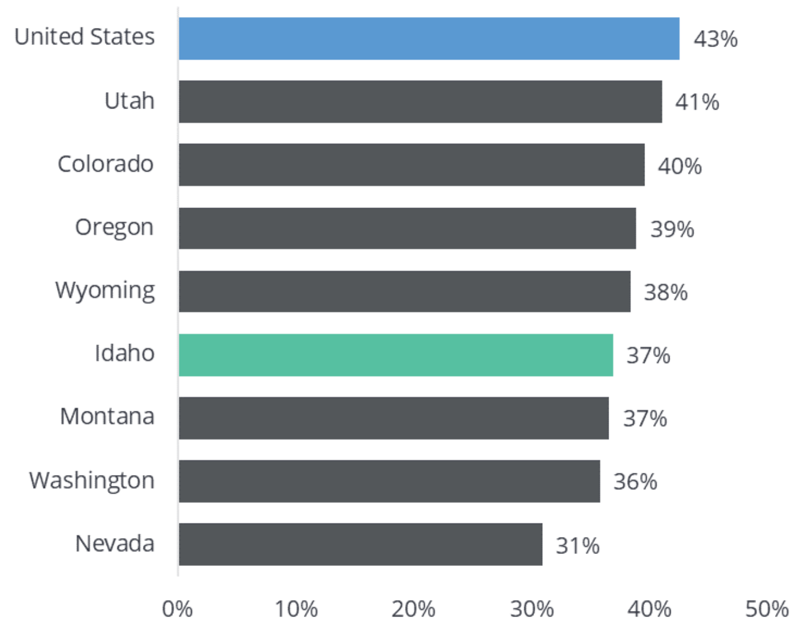
Source:

2019 5-year ACS estimates and Root Policy Research.



About 37% of Idaho's population aged 18 to 24 are currently enrolled in college or graduate school. While this is lower than the national average, it is on par with peer states.

Figure IV-33.
Percent of Population Aged 18 to 24 Enrolled in College or Graduate School, State of Idaho and Peer States, 2019

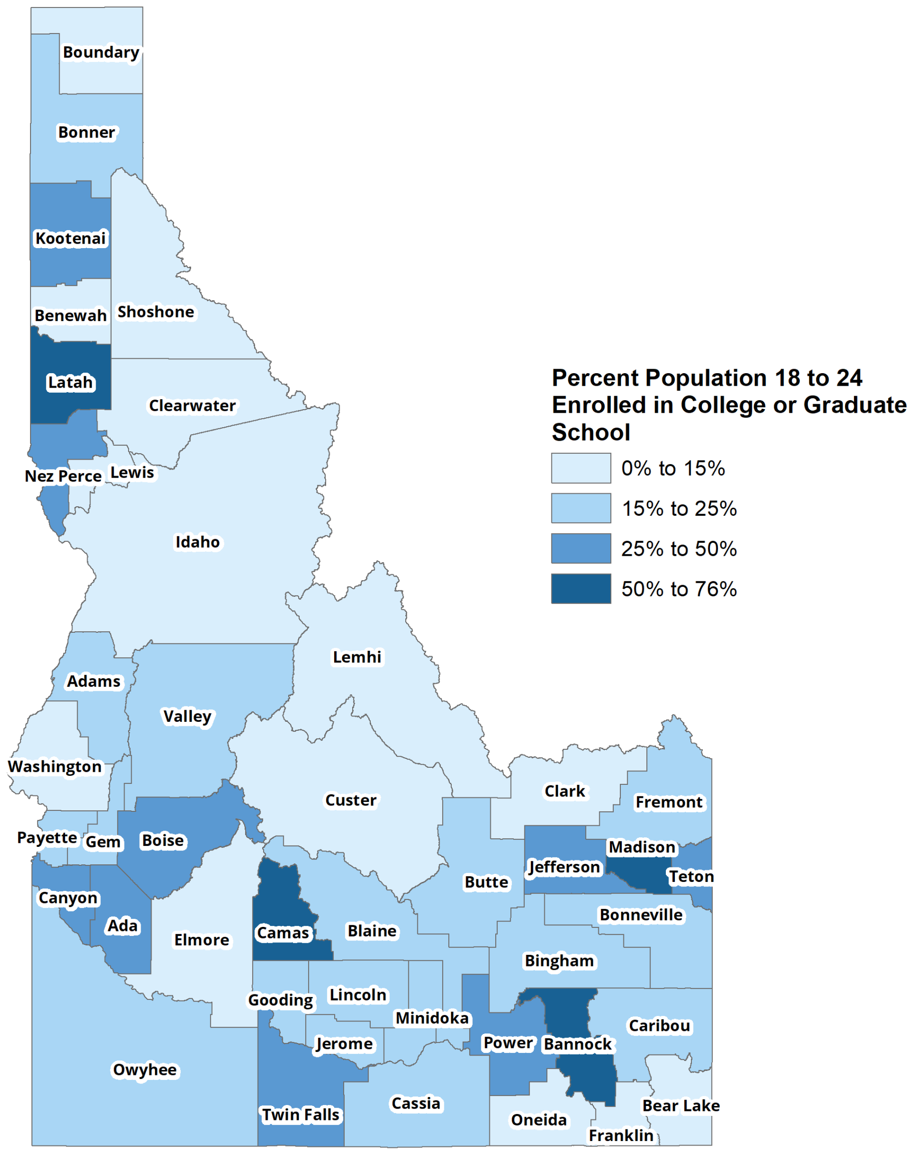


Source: 2019 5-year ACS estimates and Root Policy Research.

Figure IV-34. Percent of Population Aged 18 to 24 Enrolled in College or Graduate School, by County, 2019

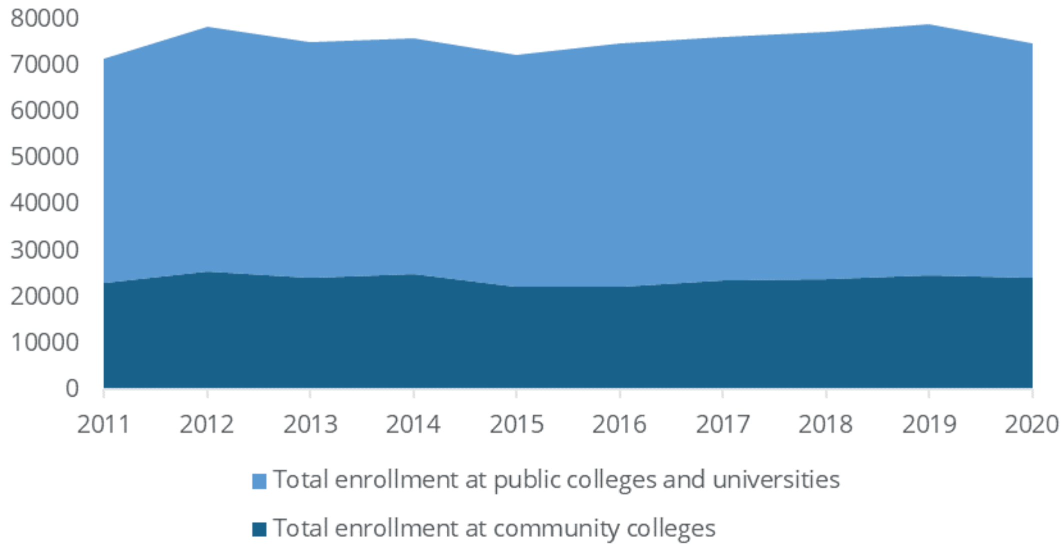
Source:

2019 5-year ACS estimates and Root Policy Research.



Enrollment at public colleges, universities, and community colleges in Idaho has increased by 5% since 2011—about .5% per year. According to the Idaho State Board of Education, in 2011 there were 23,103 students enrolled in Idaho's community colleges (including the College of Southern Idaho, the College of Western Idaho, North Idaho College, and the College of Eastern Idaho). By 2020, that number had increased to 24,279 students. The number of students enrolled in Idaho's public universities and colleges (including Boise State University, Idaho State University, University of Idaho, and Lewis-Clark State College) was 48,324 in 2011 and increased to 50,500 in 2020. However, enrollment in public colleges and universities decreased by 7% between 2019 and 2020, likely due to the pandemic. Community college enrollment only decreased by 1% between 2019 and 2020.

Figure IV-35.
Postsecondary Education Enrollment, State of Idaho, 2011 to 2020



Note: Restricted to public universities, colleges, and community colleges.

Source: The Fall 2020 Postsecondary Headcount and FTE report from the Idaho State Board of Education and Root Policy Research.

According to the Institute for College Access and Success, 60% of graduates from four-year universities in Idaho had student loan debt. The average debt of public and private graduates from 4-year colleges was $25,942 in the 2018-2019 academic year. Compared to other states, this is relatively low: Idaho ranked 39th in average debt of graduates in 2019.

Childcare deserts. School and preschool enrollment, early childhood education, and childcare not only benefit children, but also allow parents to participate in the labor force. Adequate childcare can be a solution to the declining labor force participation rates discussed above.

According to research from the Minneapolis Federal Reserve, early childhood "programs that offer enriched experiences for children and involve parents and other caregivers provide benefits for all children but have the strongest impact on children from disadvantaged environments."[14] Other studies have shown that inadequate access to childcare constrains local economic activity. For example, many scholars have found that presence of young children in the household reduces women's likelihood of labor force participation. A 2019 study found that this can be mitigated by childcare availability.[15] Other studies have found that parent absenteeism and productivity reductions due to

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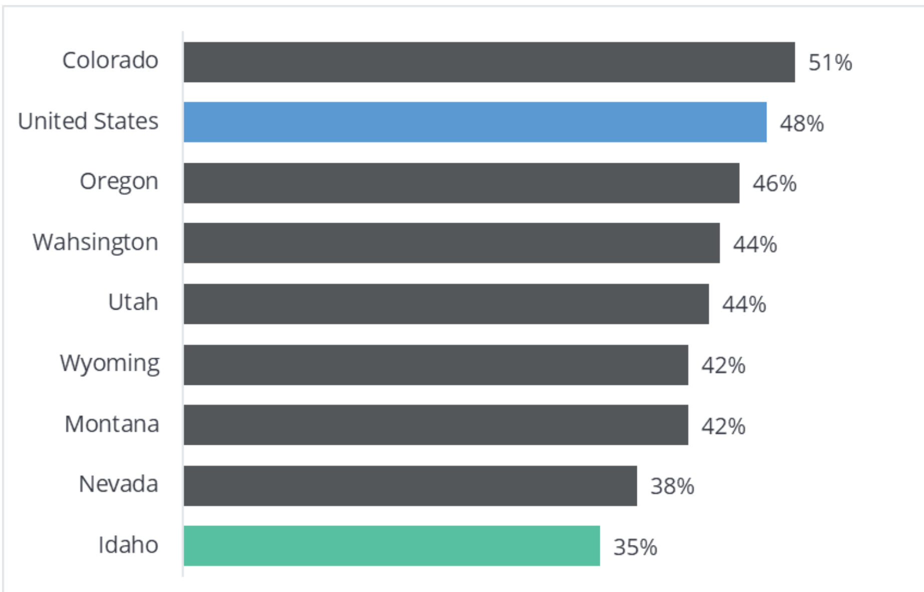
[14] Rob Grunewald, "Investments in Young Children Yield High Public Returns," Federal Reserve Bank of Minneapolis, 2016. Available at www.philadelphiafed.org/community-development/publications/cascade/93/04_investments-in-young-children

[15] Conroy, Tessa. "The kids are alright: working women, schedule flexibility and childcare." *Regional Studies* 53.2 (2019): 261-271.

childcare breakdowns cost U.S. businesses more than $3 billion annually.[16] Based on this study, one could infer that such costs in Idaho are around $18.4 million annually.[17]

School enrollment data from 2019 5-year ACS indicate that just 35% of 3- to 4-year-olds in Idaho are enrolled in school, which is substantially lower than the national average and in peer states.

Figure IV-36.
Percent of 3- to 4-Year-Old Children Enrolled in School, State of Idaho and Peer States, 2019



Source: 5-year 2019 ACS estimates and Root Policy Research.

Figure IV-37 illustrates that enrollment rates for 3- to 4-year-old children in Idaho are especially low in Clark (0%), Custer (11%), Boundary (12%), Butte (16%) and Minidoka counties (17%).

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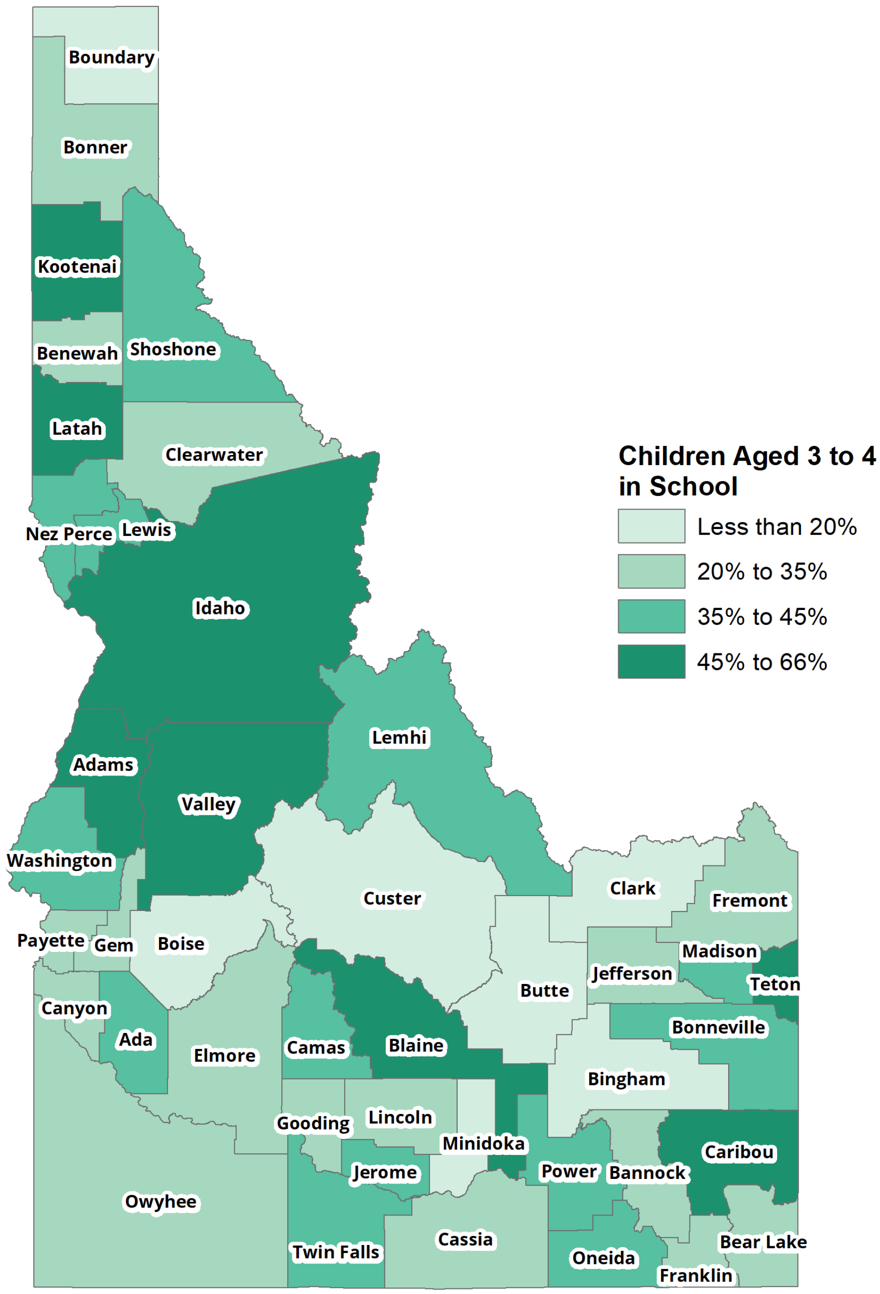
[16] Rob Grunewald, "Investments in Young Children Yield High Public Returns," Federal Reserve Bank of Minneapolis, 2016. Available at www.philadelphiafed.org/community-development/publications/cascade/93/04_investments-in-young-children

[17] Calculated based on the share of children under age 6 living in Idaho compared to the national count of children under age 6.

Figure IV-37. Percent of 3- to 4-Year-Old Children Enrolled in School by County, 2019

Source:

5-year 2019 ACS data and Root Policy Research.



Many households in Idaho also do not have adequate access to childcare outside of school. A childcare desert is defined as an area where there are more than three times as many children as licensed childcare slots. According to research done by the Center for American Progress, 49% of people in Idaho lived in a childcare desert in 2018.[18]

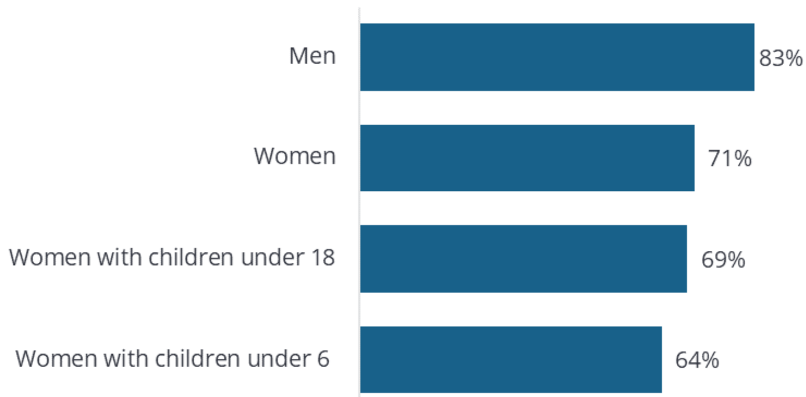
Hispanic Idahoans were more likely to live in a childcare desert: 56% lived in a childcare desert compared to 48% of non-Hispanic White Idahoans and 29% of non-Hispanic Black

[18] https://childcaredeserts.org/2018/?state=ID

Idahoans. This is largely to do with urban and rural residential patterns: 29% of Idahoans living in urban areas are in a childcare desert as opposed to 38% of those in suburban areas and 65% of those in rural areas. There were several Census tracts in Idaho that had no licensed childcare providers in 2018. These tracts were located in Bonner, Kootenai, Clearwater, Idaho, Lemhi, Freemont, Jefferson, Washington, Owyhee, Camas, Minidoka, Cassia, Power, and Bingham counties.

In Idaho, women aged 24 to 64 already have lower labor force participation rates than men in the same age group. However, the gap is wider for women with children and even wider for women with children under 6, as illustrated in Figure IV-38.

Figure IV-38.
Labor Force Participation Rates by Gender, State of Idaho, 2019



Note: Labor force participation rates for population within age 24 to 64 years. Data for men with children are not available.

Source: 2019 5-year ACS estimates and Root Policy Research.

Mothers' labor force participation rates were especially low in Butte and Boundary Counties (51%) and in Franklin and Camas Counties (52%). Mothers' labor force participation rates were highest in Valley (86%), Blaine (85%), and Benewah (81%) counties.

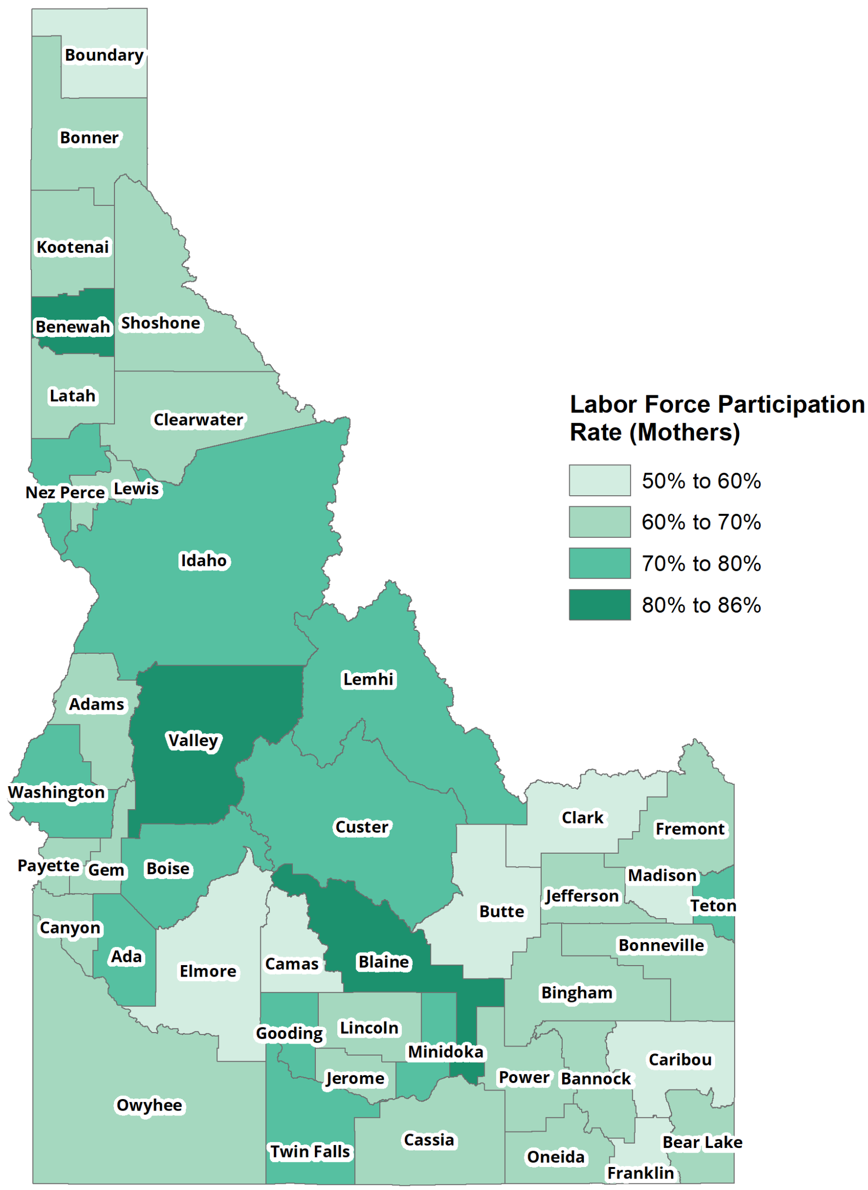
Figure IV-39. Mothers' Labor Force Participation Rates by County, 2019

Note:

Labor force participation rates for women within ages 24 to 64 years who have a child under 18 in their household.

Source:

2019 5-year ACS estimates and Root Policy Research.



The Idaho Child Care Program provides childcare financial assistance to working families. The Idaho Department of Health and Welfare is implementing a higher reimbursement rate through the Idaho Child Care Program in October 2021—assistance that will be critical to restore the loss of care during the pandemic. The Idaho Capital sun reported that more than 200 care centers across Idaho closed between September 2020 and April 2021.[19] Many providers face issues with staffing, particularly when jobs with similar education requirements offer higher wages.

[19] Moseley-Morris, Kelcie, "'Our economy won't recover without child care.' Boise-area child care providers to protest Legislature's inaction." Idaho Capital sun, April 30, 2021. Available at: https://idahocapitalsun.com/2021/04/30/our-economy-wont-recover-without-child-care-boise-area-child-care-providers-to-protest-legislatures-inaction/

Healthcare shortages. A 2019 study found that mortality rates are higher in rural areas than in urban areas in the United States. The scholars discovered that much of this is attributable to physician shortages and lack of health insurance, two problems which plague Idaho.[20]

According to 2018 data from the Department of Health and Human Service's' Area Health and Resource Files, Idaho has the lowest proportion of physicians as a share of the population compared to any other state. In Idaho, there are just 2.4 physicians for every 1,000 people, while the median rate across all fifty states and D.C. is 3.5. Neighboring states have varying rates: Wyoming, Nevada, and Utah have similarly low rates, just 2.6, 2.7, and 2.8 physicians per every 1000 people, respectively. Washington and Oregon sit much higher at 3.7 and 4.0, respectively, while Montana has about 3.3 physicians for every 1,000 people.

Some counties in the state have more severe healthcare shortages than others. Custer, Clark, and Camas Counties reported no physicians in 2018. Other counties had very low rates of physicians per population. For instance, Owyhee County reported less than 0.1 physicians per 1,000 people in the county. Similarly, Lincoln County reported 0.2 physicians per 1,000 people, and Lewis and Power County had 0.3 physicians per 1,000 people in the county. Other counties with less than one physician per 1,000 people were Boise, Butte, Gooding, Jefferson, Jerome, Minidoka, Franklin, Oneida, Boundary, Adams, and Gem counties.

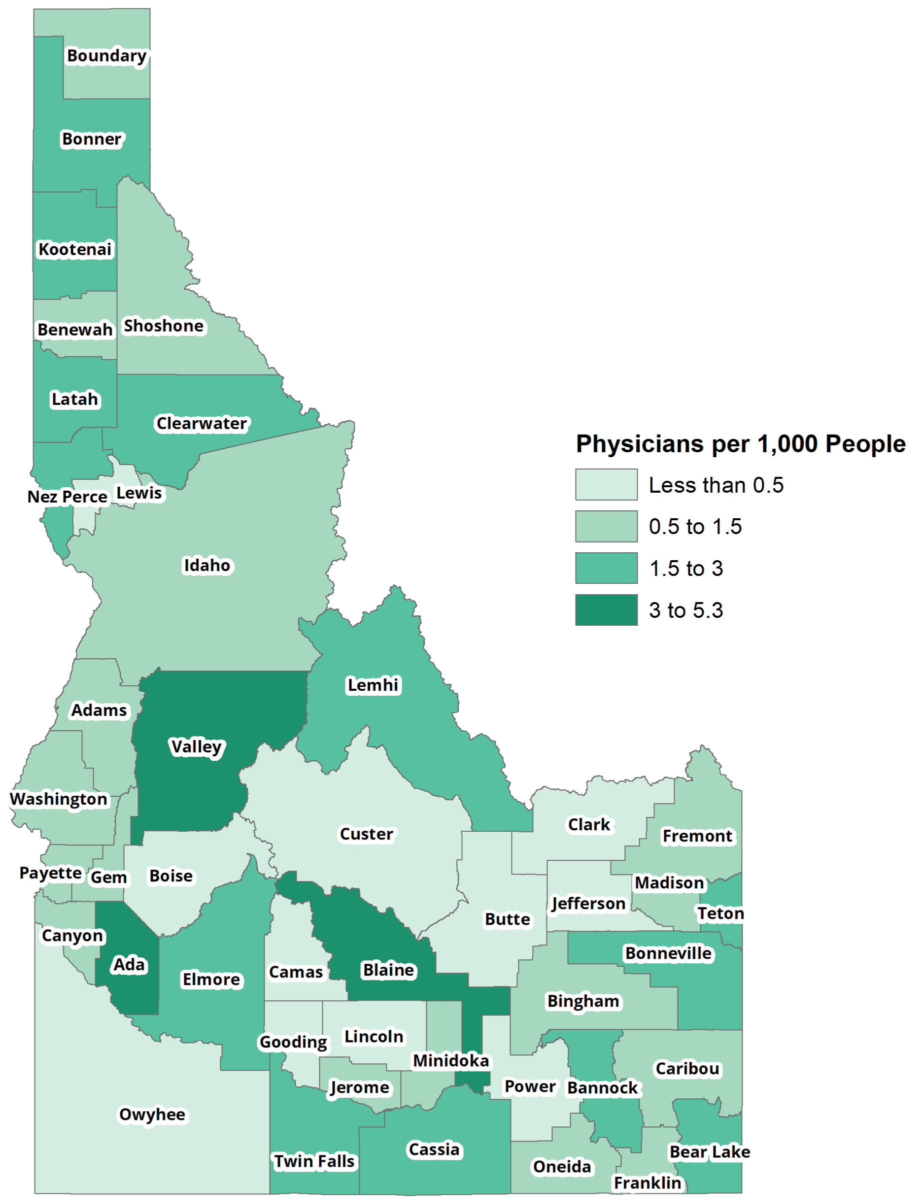
On the other end of the spectrum, Blaine County had the highest number of physicians per capita, with 5.3 physicians per every 1,000 people. Ada County also had a relatively high number of physicians with 3.9 per every 1,000 people as did Valley County, with 3.5 physicians per every 1,000 people. As shown in the following map, there are no defined geographic patterns to the supply of physicians.

[20] Gong, Gordon, et al. "Higher US rural mortality rates linked to socioeconomic status, physician shortages, and lack of health insurance." Health Affairs 38.12 (2019): 2003-2010.

Figure IV-40. Physicians per 1,000 People by County, 2018

Source:

Department of Health and Human Service's' Area Health and Resource Files and Root Policy Research.



To encourage more doctors to practice in Idaho, the state has two incentive programs: the Rural Healthcare Access Program and the Rural Physician Incentive Program. The Rural Healthcare Access Program is a way for Idaho communities to recruit doctors by offering signing bonuses or student loan repayments, as well as developing telehealth projects and improving access to care. The Rural Physician Incentive Program is a loan repayment program for doctors who chose to practice in a rural part of the state. Doctors are eligible to apply for up to $100,000 of loan repayment.

Idaho's low physician-per-person rate implies severe medical shortages in the state, which affect the wellbeing of residents and the productive potential of the workforce. A 2017 study found that about half of prime age men who are not in the labor force may have a serious health condition that is a barrier to working.[21] Additionally, several Idahoans do not have health insurance, which further impedes their ability to successfully participate in society and the workforce.

In 2018, 13% of Idaho's population under age 65 did not have health insurance. This was above the national average of 10%. Further, 6% of children (people under age 19) in Idaho did not have health insurance compared to 5% of children nationwide.

As illustrated in Figure IV-41, counties like Lincoln, Gooding, Owyhee, and Clark have more than 20% of their residents uninsured. In fact, in Clark County, 27% of the under-65 population does not have health insurance. Ada, Caribou, Latah, and Bear Lake counties each had lower rates, with less than 11% of their populations having no insurance.

[21] Krueger, Alan B. "Where have all the workers gone? An inquiry into the decline of the US labor force participation rate." Brookings papers on economic activity 2017.2 (2017): 1.

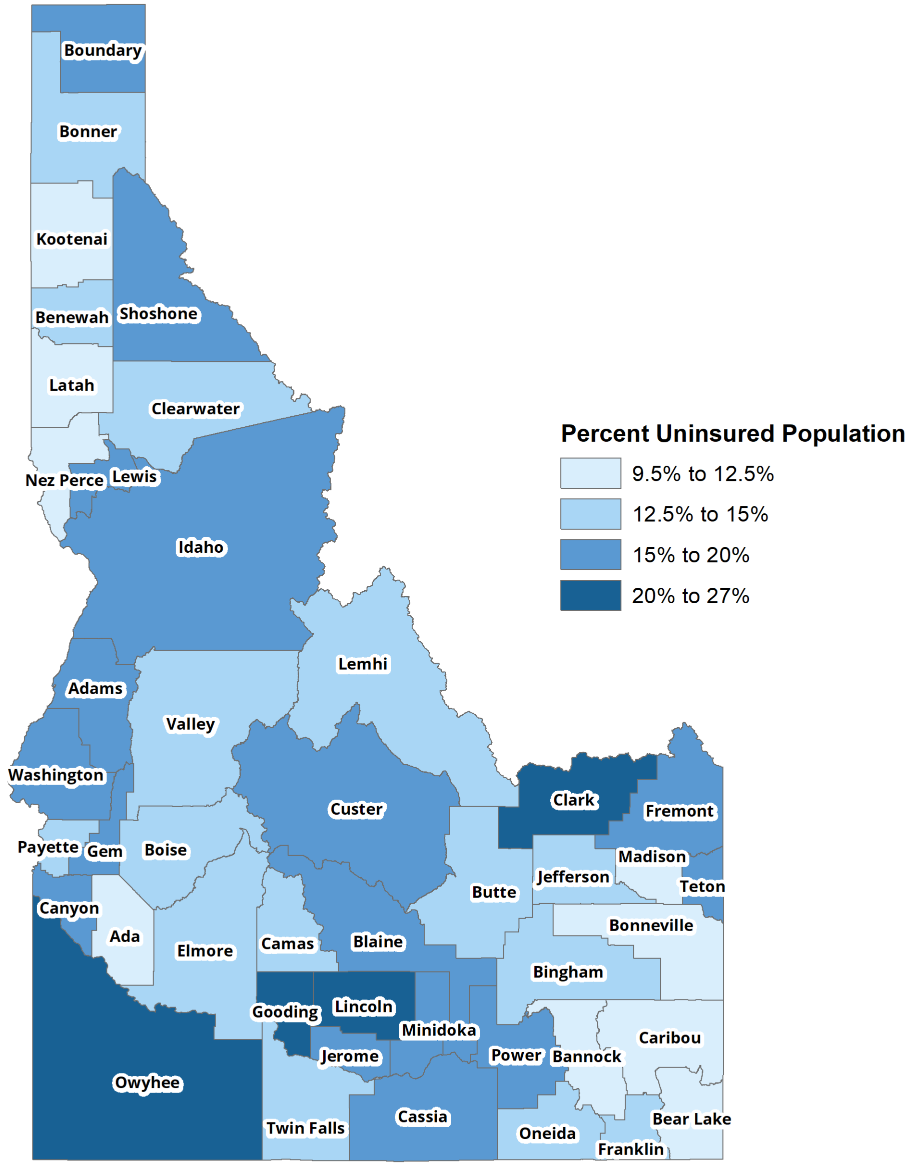
Figure IV-41. Percent Uninsured Individuals by County, 2018

Note:

Includes only population under age 65, before individuals qualify for Medicare.

Source:

2018 Small Area Health Insurance Estimates from the US Census Bureau and Resource Files and Root Policy Research.



As shown in Figure IV-42, Ada County also had the lowest share of uninsured children, with just 4% of its under 19 population without health insurance. Bonneville and Madison Counties also had less than 5% of their child populations uninsured. Counties with the largest shares of uninsured children were Clark (14%), Owyhee (11%), Blaine (10%), Jerome (10%), Teton (10%), and Lincoln (10%).

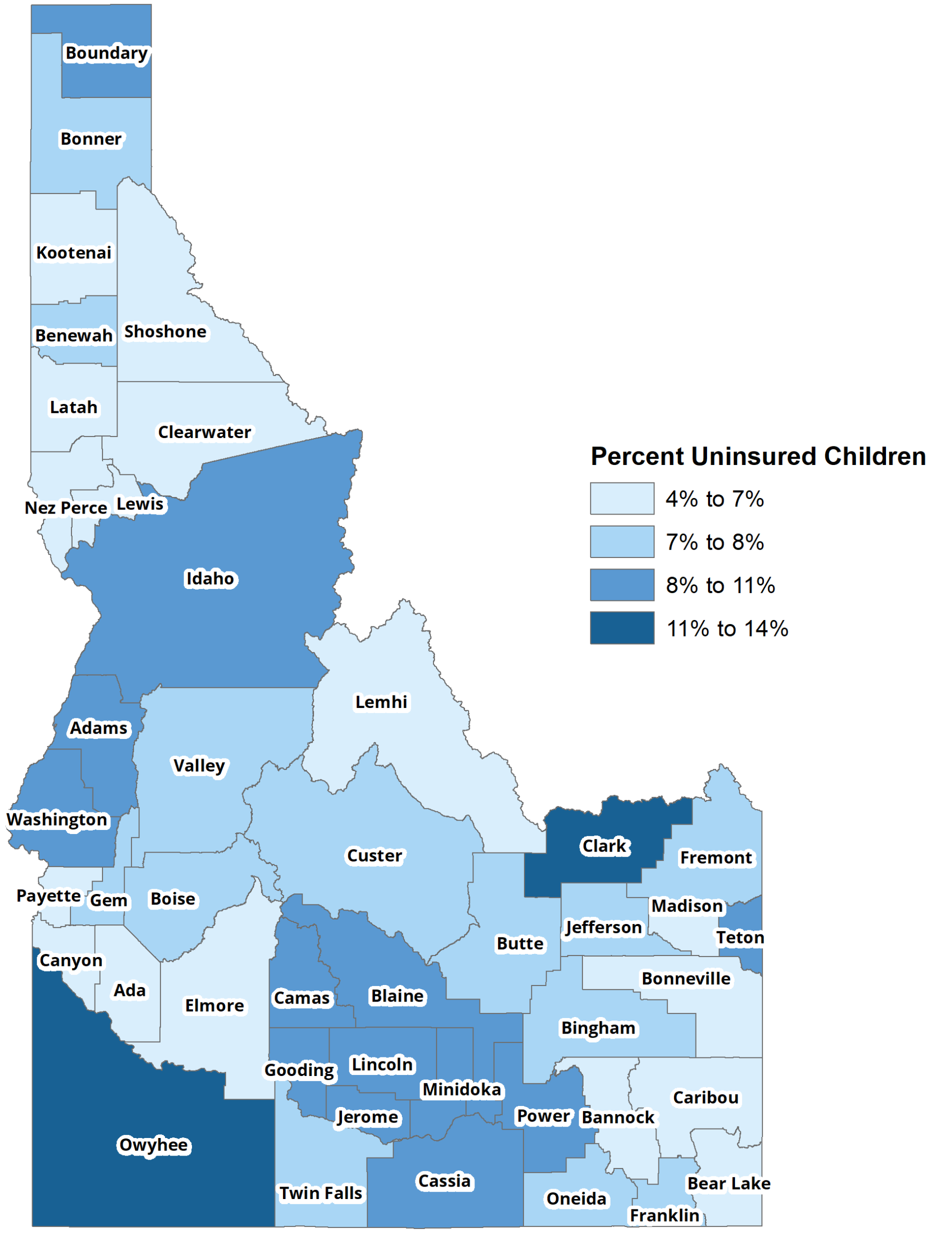
Figure IV-42. Percent of Children Uninsured by County, 2018

Note:

Includes only population under age 65, before individuals qualify for Medicare.

Source:

2018 Small Area Health Insurance Estimates from the US Census Bureau and Resource Files and Root Policy Research.



Environmental quality. HUD's most recent (2018) Environmental Health Index is shown in Figure IV-43. Index values range from 0 to 100. The higher the index value, the less exposure to harmful toxins. In other words, the higher the value, the better the environmental quality. As expected, environmental health is lower in some more populous areas and in communities with more industrial/commercial activity. Upon aggregating the tract-level environmental hazard indices by county, Ada County had the lowest average environmental quality index, followed by Canyon, Payette, and Kootenai counties. Counties with the highest average environmental hazard indices were Franklin, Lewis, Butte, Teton, Clark, Camas, Oneida, and Bear Lake counties.

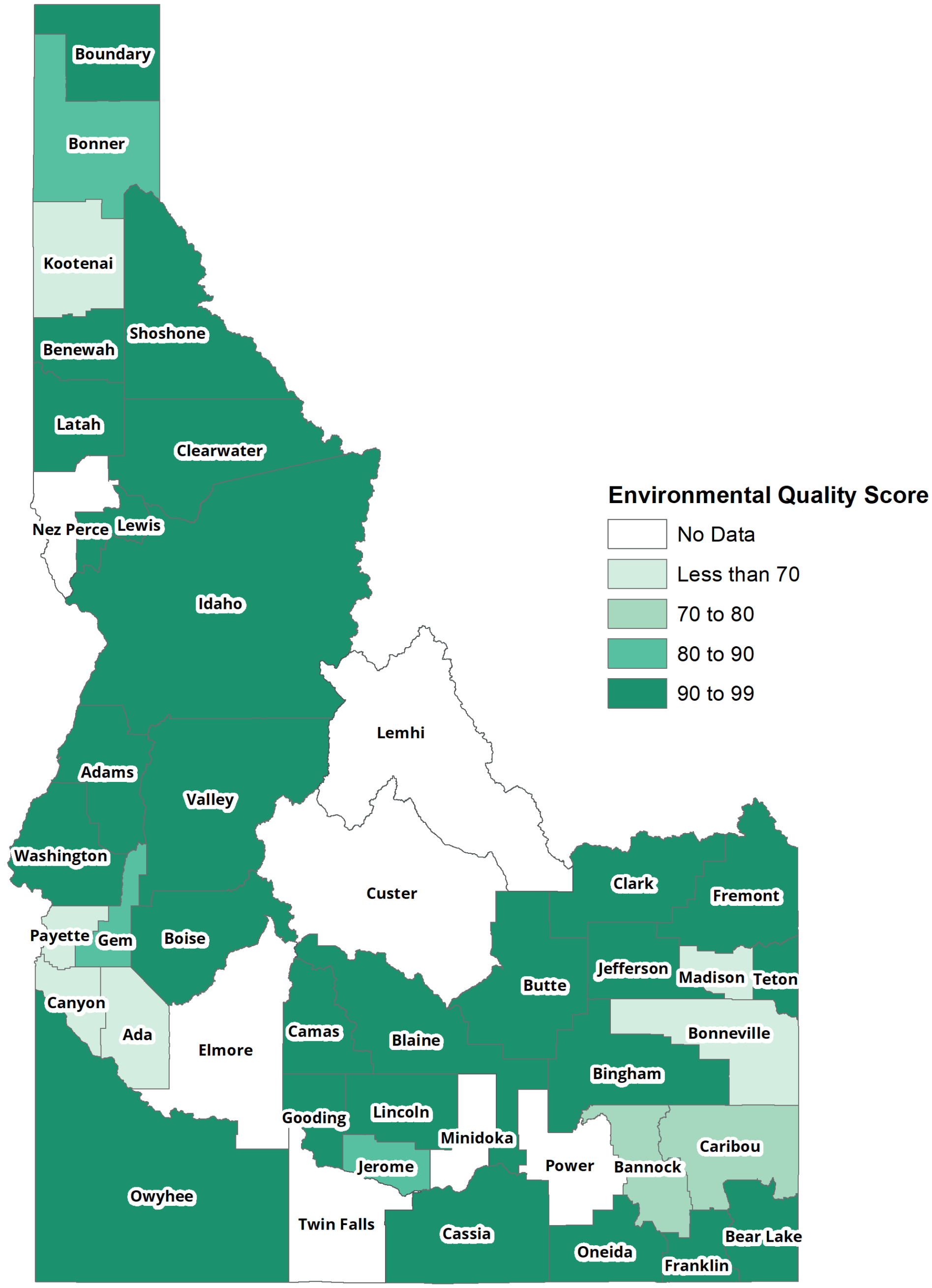
Figure IV-43. Environmental Health Index, Average by County, 2018

Note:

Data are not available for tracts in Twin Falls, Power, Minidoka, Custer, Nez Perce, Elmore, and Lemhi counties.

Source:

HUD Environmental Health Hazard Exposure Index and Root Policy Research.



Transportation and Migration Patterns

Transportation and migration are important links between economic vitality and housing affordability. This final section discusses current commuting patterns, transportation costs, and migration trends in Idaho.

Commuting patterns. Statewide, 88% of Idahoans got to work in a car, truck, or van according to 5-year 2019 American Community Survey data. Ten percent of commuters statewide carpooled, but the percent of commuters carpooling was much higher in Teton

County (18%), Bingham County (14%), Boise County (13%), Madison County (13%) and Power County (13%). Carpooling efforts may be related to affordability, environmental consciousness, or lack of public transit options.

Less than 1% of Idahoans statewide took public transportation to work, but rates were higher in Jefferson County and Bingham County, where 3% of workers took public transit. Just under 3% of workers in Idaho walked to work, but 14% in Latah County walk to work, and between 7% and 9% walk to work in Custer, Shoshone, Washington, Lewis, Idaho, and Madison Counties. Under 1% of Statewide workers biked to work, but biking was more common in Latah County, where 3% biked, and in Ada County, where 2% biked.

Figure IV-44.
Commute Type by County, 2019

	Drove alone	Carpooled	Public transit	Walked or biked	Taxicab, motorcycle or other	Worked from home
Metro						
Ada	81%	12%	1%	3%	1%	14%
Bannock	77%	16%	1%	5%	0%	6%
Boise	68%	11%	1%	4%	1%	10%
Bonneville	79%	10%	1%	4%	0%	7%
Butte	75%	7%	0%	0%	0%	11%
Canyon	79%	17%	0%	4%	2%	5%
Franklin	81%	10%	1%	3%	1%	6%
Gem	77%	7%	0%	3%	3%	8%
Jefferson	76%	11%	3%	3%	2%	6%
Kootenai	81%	9%	0%	2%	1%	6%
Nez Perce	82%	7%	0%	4%	1%	5%
Owyhee	75%	12%	1%	6%	1%	6%
Nonmetro micropolitan						
Bingham	75%	6%	2%	4%	2%	10%
Blaine	76%	14%	0%	6%	2%	10%
Bonner	73%	10%	3%	2%	1%	5%
Camas	81%	12%	0%	2%	1%	6%
Cassia	80%	8%	0%	5%	0%	7%
Elmore	79%	11%	1%	2%	1%	5%
Fremont	79%	12%	0%	1%	1%	8%
Jerome	80%	12%	1%	4%	0%	4%
Latah	66%	11%	1%	17%	1%	4%
Lincoln	72%	16%	1%	5%	0%	7%
Madison	71%	13%	1%	10%	1%	5%
Minidoka	83%	11%	0%	2%	0%	4%
Payette	82%	10%	0%	4%	0%	4%
Teton	65%	18%	1%	3%	0%	13%
Twin Falls	82%	9%	0%	2%	1%	5%
Nonmetro noncore						
Adams	70%	12%	1%	4%	1%	5%
Bear Lake	72%	10%	1%	5%	1%	5%
Benewah	79%	14%	3%	2%	1%	5%
Boundary	79%	13%	1%	4%	3%	5%
Caribou	72%	11%	0%	3%	1%	4%
Clark	80%	11%	0%	4%	3%	6%
Clearwater	76%	13%	1%	7%	3%	15%
Custer	62%	13%	0%	2%	2%	4%
Gooding	79%	10%	1%	4%	1%	6%
Idaho	69%	13%	1%	9%	2%	7%
Lemhi	72%	13%	0%	4%	3%	8%
Lewis	76%	9%	0%	8%	1%	6%
Oneida	77%	16%	0%	3%	0%	4%
Power	74%	13%	0%	2%	2%	9%
Shoshone	75%	10%	0%	7%	3%	5%
Valley	79%	6%	1%	4%	1%	10%
Washington	70%	12%	1%	8%	3%	8%
State of Idaho	79%	7%	0%	3%	1%	7%

Source: 5-year 2019 ACS estimates and Root Policy Research.

The data illustrate that Idahoans largely rely on cars to get to work, and, as long as these trends remain, funding alternative means of transportation can be challenging. The lack of transportation options disproportionately affects those who cannot afford a car. Statewide, 1.6% of workers do not have access to a car, with the highest rate in Washington County, where 4.6% do not have access to a car. Similarly, in Latah County, 3.1% of workers do not have access to a car, and 2.5% of workers in Madison, Nez Perce, and Boundary counties do not have access to a car.

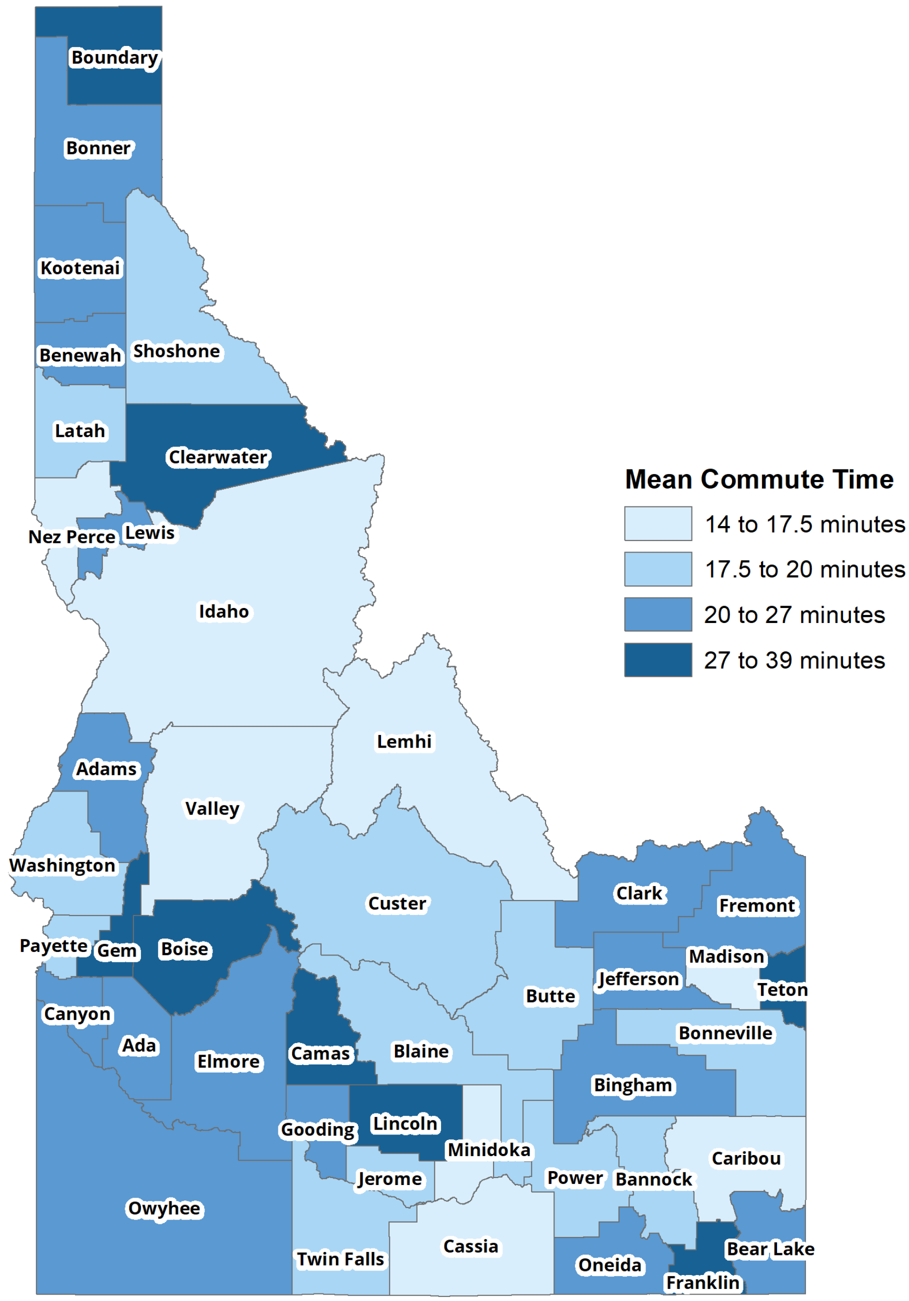
Before the pandemic, in 2019, 6% of Idaho workers worked from home. The percent of workers who worked from home was especially high in Custer (15%), Adams (14%), Teton (13%), Camas (11%), Blaine (10%), and Valley (10%) counties. Counties where workers were least likely to work from home include Payette, Jerome, and Minidoka counties, where just 4% of workers worked from home. During the pandemic, far more workers worked from home. According to PULSE data from the US Census, during April of 2021, 20% of workers in Idaho were teleworking due to the coronavirus. This is below the national average of 27% and has declined from earlier in the pandemic. In August 2020, 34% of Idaho households were working from home, which was much closer to the national average of 36%.

Working from home cut down on long commute times for many in Idaho. Across the state, mean travel time to work was 21 minutes. As illustrated in Figure IV-45, average commute times were high in Camas County (39 minutes), Boise County (38 minutes), Lincoln County (30 minutes), and Clearwater County (30 minutes). In fact, 34% of workers in Camas County and 20% of workers in Boise and Lincoln counties had commutes over an hour long. Average commute times were lowest in Madison and Valley County: both under 15 minutes.

Figure IV-45. Mean Commute Time by County, 2019

Source:

5-year 2019 ACS estimates and Root Policy Research.



Several workers commute out of their county or out of the state for work. Overall, 16% of Idahoan workers commute to a county different from the one in which they live and 5% commute outside the state. Unsurprisingly, counties near the border, like Bear Lake (12%), Nez Perce (15%), Kootenai (17%), Washington (18%), Latah (20%), Payette (32%), Teton (33%), Oneida (34%), and Franklin (43%) have large shares of workers commuting to different states for their jobs.

Over half of workers residing in Boise, Owyhee, Camas, and Jefferson counties commute to other counties in Idaho for their jobs. Similarly, between 40% and 50% of working residents in Adams, Fremont, Gem, Lincoln, and Clark counties commute to different counties in Idaho for work. Workers residing in Valley, Oneida, Kootenai, Blaine, and Nez Perce counties are least likely to be commuting to another county within Idaho for work: less than 5% of their working populations do so.

Transportation costs. In addition to time lost from long commute times, many Idahoans spend a large percent of their incomes on transportation costs. Figure IV-46 illustrates transportation costs as a percent of income across Idaho.

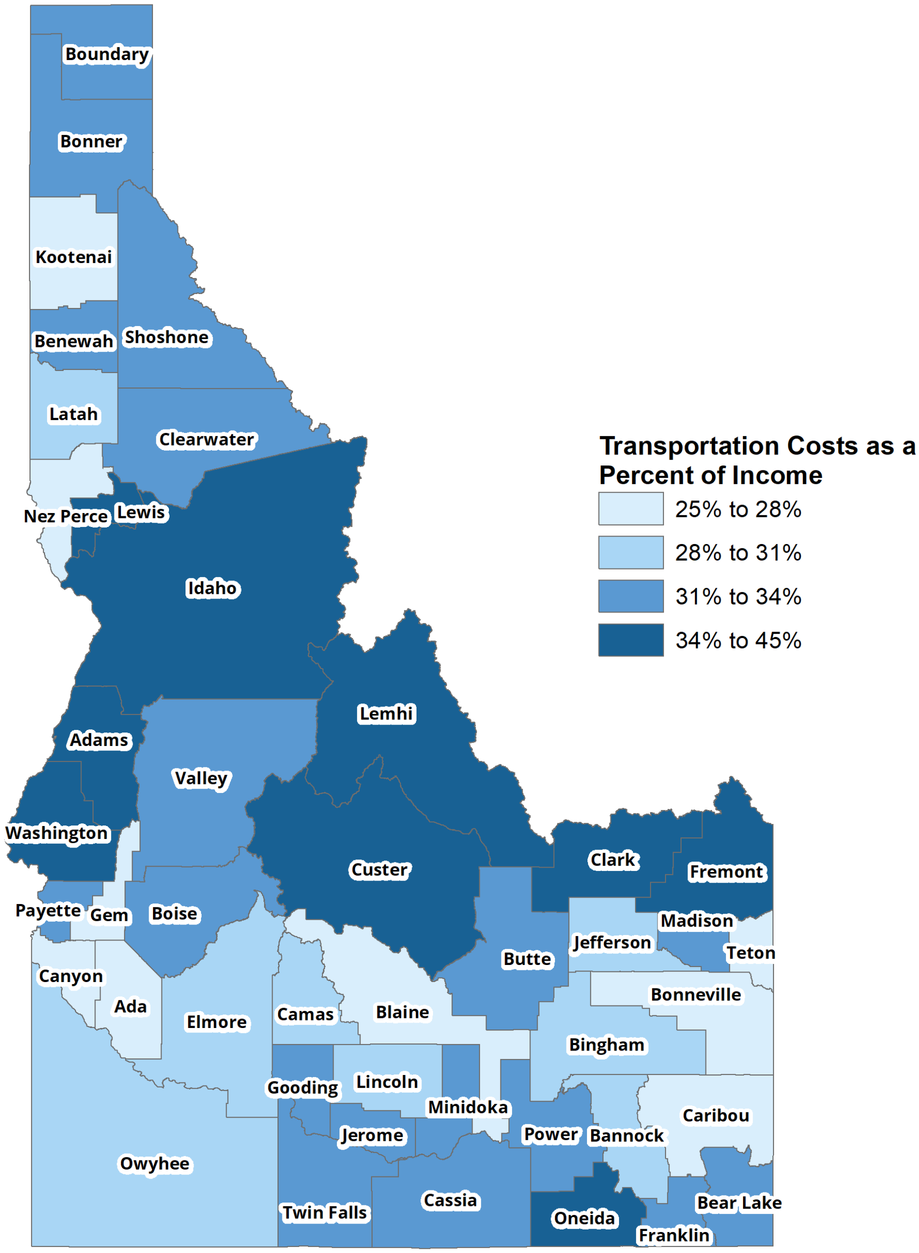
On average, residents in Ada and Teton Counties face the lowest transportation costs as a percent of their incomes. Transportation costs were 25% of household incomes on average in Teton County, and 26% in Ada County.

Clark and Fremont counties had the highest ratios: 45% of average household income was spent on transportation in Clark County and 40% in Fremont County.

Figure IV-46. Transportation Costs as a Percent of Income by County, 2019

Source:

The Housing and Transportation affordability Index data and Root Policy Research.



Migration trends. Many households migrate for job and housing opportunities, both within Idaho and outside of Idaho. This section examines intra-state migration, migration to and from other states, and international migration.

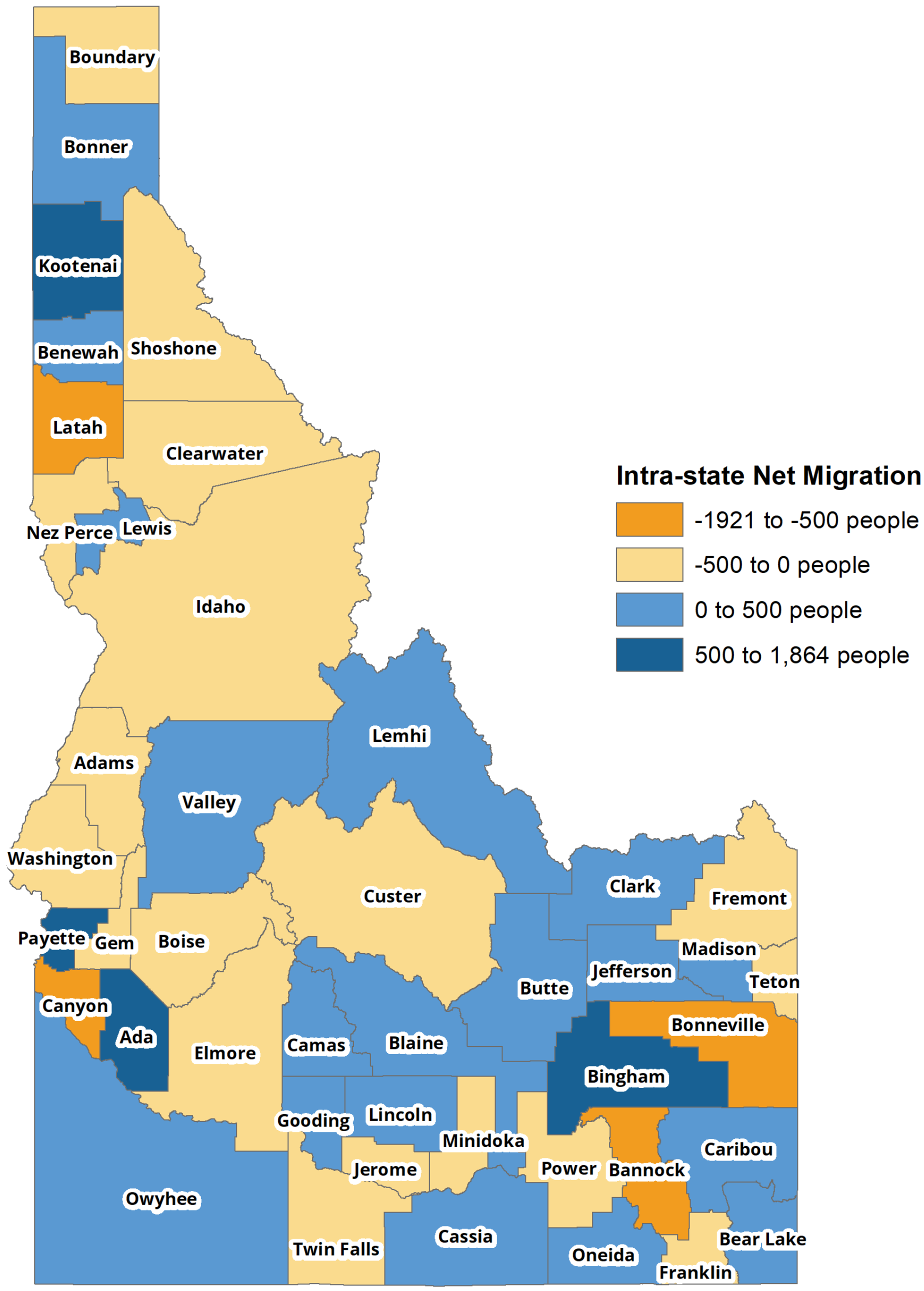
Intra-state migration. In 2019, according to ACS data, an estimated 53,937 Idaho residents moved from one county within Idaho to another. Ada County saw the largest net inflow from other counties, with 1,864 net within-state migrants. Bingham (891), Kootenai (876), Payette (550), and Gooding (479) counties also experienced many net in-migrants from other counties in Idaho.

Canyon County, on the other hand, experienced the largest amount of net out-flows from their county to others in Idaho (1,921). Although it is difficult to determine the reason without precise data, this could be due to displacement: Canyon County has typically provided some of the most affordable housing in the Boise metropolitan area yet has experienced rapid cost increases, which is likely to have displaced some Canyon County households. Similarly, Bonneville (576), Bannock (523), Boise (401), and Jerome (320) counties witnessed large net outmigration to other counties in Idaho.

Figure IV-47. Net Migration within Idaho by County 2019

Source:

5-year 2019 ACS estimates and Root Policy Research.

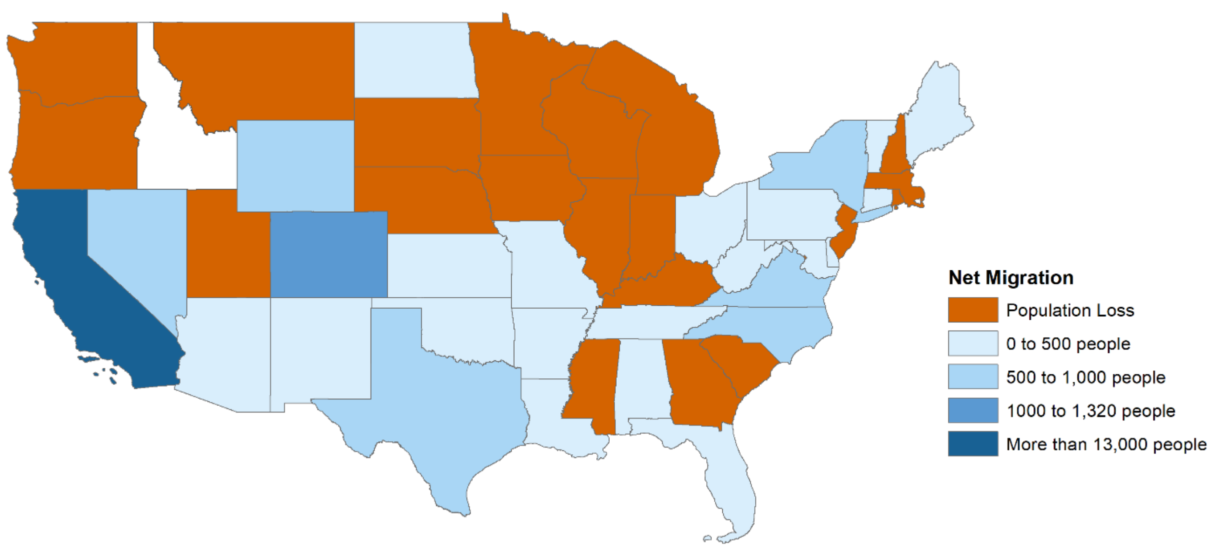


State-to-state migration. Several stakeholders discussed the effect of in-migrants on housing affordability in the state. According to 5-year 2019 ACS data, there were an estimated 73,705 people who moved into Idaho from other states and 55,948 who left Idaho for other states. This means that, on net, there were approximately 17,757 more people who moved into Idaho than left in 2019. Many of the domestic migrants moving to Idaho were from California: an estimated 13,388 individuals moved to Idaho from California in 2019. A large share of net in-migrants also came from Colorado, Nevada, and Wyoming.

Idahoans who left the state most commonly moved to Washington State (1,039 net outmigrants from Idaho to Washington) and Iowa, Montana, Michigan, and Utah. Figure IV-48 illustrates net migration by state.

Many of these 17,757 out-of-state net migrants moved into Ada County (6,772), Canyon County (2,657), and Bonneville County (1,215), Kootenai County (1,179), Twin Falls (1,177) and Bonner County (1,041). There was a large amount of net out-migration from Nez Perce (972), Madison (768), Latah (386), and Bingham (256) counties to other states in the country.

Figure IV-48.
Net Migration into/out of Idaho by State, 2019

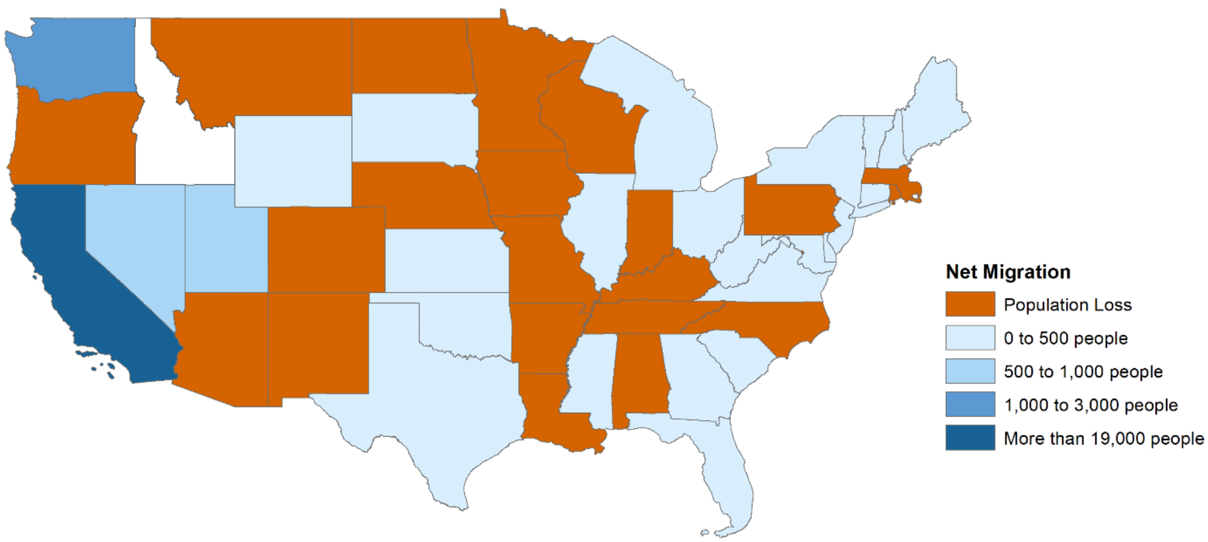


Source: 2019 5-year ACS estimates and Root Policy Research.

Data from Dr. Jaap Vos at the University of Idaho make use of 2020 DMV license records to examine migration and indicate similar trends. According to these data, there were 22,689 net in-migrants to Idaho in 2020, with the vast majority of these (19,053) from California. The second highest number of in-migrants were from Washington (2,945), Nevada (913), and Utah (881). The counties with the most out-of-staters' net migration were Ada County (10,019), Kootenai County (3,725) and Canyon County (2,640).

Top states for out-migration from Idaho were Arizona (-862), Montana (-810) and Oregon (-723). On net, Idahoans left Latah (-88) and Bannock (-52) at the highest rates to go to other states.

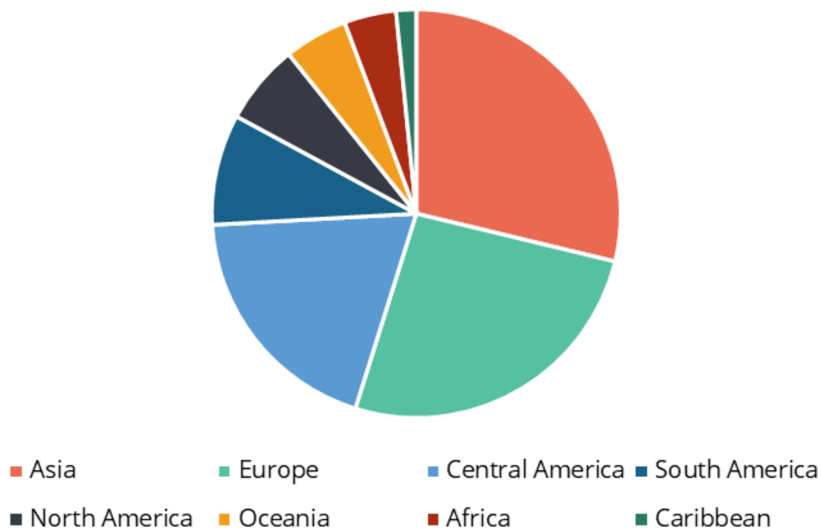
Figure IV-49.
Net Migration into/out of Idaho by State according to DMV License Data, 2020



Source: Dr. Jaap Vos at the University of Idaho and Root Policy Research.

International migration. According to 2019 5-year ACS data, there were 7,526 international immigrants who moved to Idaho. The majority of international migrants coming into Idaho were from Asia (29%) and Europe (26%). Others commonly came from Central America (19%), from South America (6%), and from other counties in North America (6%).

Figure IV-50.
International Migration into Idaho, 2019



Source: 5-year 2019 ACS estimates and Resource Files and Root Policy Research.

ACS data also indicate that foreign born Idaho residents are more likely to be in the labor force than U.S. born Idaho residents: 71% of foreign-born residents are in the labor force as opposed to 63% of native-born residents. This varies by citizenships status: foreign born residents who have become naturalized citizens have a 66% labor force participation rate while noncitizen foreign born residents have a 74% labor force participation rate.

As illustrated in Figure IV-51, foreign-born workers are more likely to work in industries like agriculture, mining, construction, and manufacturing compared to U.S.-born workers. They are also more likely than U.S. born workers to be employed in entertainment, accommodation, and food service jobs—generally lower paying jobs. In fact, foreign-born workers make up 8% of all workers in Idaho, but represent 24% of all workers in agriculture, forestry, fishing/hunting, and mining. They also make up 15% of workers in manufacturing, and 10% of all workers in entertainment, accommodation, and food service.

Figure IV-51.
Distribution of U.S.-born and Foreign-born Idaho Workforce by Industry, State of Idaho, 2019

	Percent of foreign-born workforce	Percent of US-born workforce
Agriculture, forestry, fishing/hunting, mining	14%	4%
Construction	11%	9%
Manufacturing	18%	9%
Wholesale trade	1%	3%
Retail trade	8%	13%
Transportation, warehousing, utilities	3%	5%
Information	0%	2%
Finance, insurance, real estate	3%	6%
Professional, scientific, & manangment services	7%	9%
Education, health, & social services	17%	22%
Entertainment, accommodation, & food service	12%	10%
Other services	4%	4%
Public administration	3%	5%

Source: 2019 ACS estimates and Root Policy Research.

SECTION V.

STAKEHOLDER PERSPECTIVES

SECTION V.
Stakeholder Perspectives

Idaho stakeholders who work in the fields of housing and community development were surveyed as part of the development of this AI. This section reports the findings from that survey.

This section is organized around the themes covered in the stakeholder survey and discusses stakeholders' perspectives on:

- Barriers to housing choice;
- Barriers unique to persons with disabilities;
- Barriers to economic opportunity, including childcare, transportation, and broadband;
- Capacity and resources, including fair housing knowledge and training needs;
- State and federal regulations and policy;
- Local regulations; and
- Needs associated with the COVID-19 pandemic.

Primary Findings

Top-rated stakeholder concerns. Since stakeholders were last surveyed about fair housing in 2016, there has been a substantial increase in the perception of the seriousness of fair housing issues and affordable housing challenges in general. Based on stakeholders' ratings of the seriousness of fair housing issues, top concerns include:

- Lack of affordable rental housing near employment centers;
- Loss of low-cost or market rate affordable housing due to revitalization;
- Lack of diverse housing types/price points;
- Lack of affordable, integrated housing for individuals who need supportive services;
- Lack of affordable rental housing near proficient schools;
- Lack of affordable rental housing near public transportation;
- Lack of available affordable housing for persons with disabilities transitioning out of institutions. Stakeholders described the availability of

affordable and accessible housing units for persons with disabilities as "wildly insufficient."

- ➢ Influence of outside private equity investment on housing supply; and
- ➢ Lack of affordable day care.

Top concerns compared to 2016. Stakeholders' ratings of housing challenges increased significantly from 2016. The areas where concerns increased the most based on the average rating include:

- The need for practical and effective solutions to fair housing violations—50% of stakeholders rated this as a serious or very serious issue compared to just 19% in 2016;
- Loss of affordable, privately-provided housing (commonly called Naturally Occurring Affordable Housing, or NOAH)—78% of stakeholders consider this a serious or very serious issue v. 32% in 2016;
- Lack of affordable rental housing near proficient schools—76% in 2021 v. 30% in 2016; and
- Lack of land zoned for multifamily development—50% in 2021 v. 13% in 2016.
- Other concerns that increased significantly between 2021 and 2016 concern state tax policy, state school funding formulas, state regulations affecting land use, and overly restrictive local zoning and land use regulations.

Open response observations. Throughout the survey, stakeholders were invited to share their observations and concerns in open response text boxes. Those responses focused on the impact of the housing supply shortage on economic development; limited access to broadband for low income households; and inadequacy of resources to properly address growing needs.

Specifically,

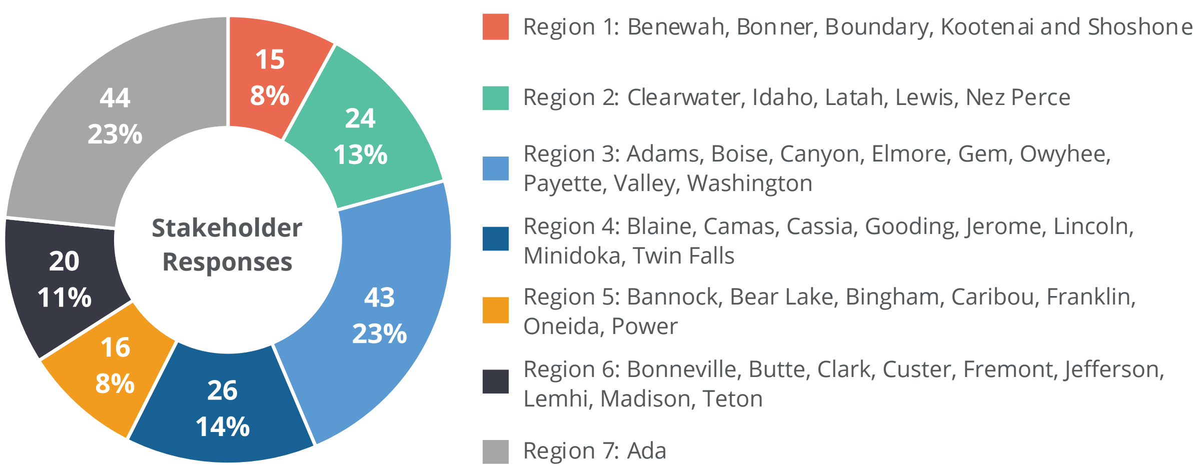
- In many parts of the state, low vacancy rates and lack of affordable housing for employees is forcing workforce to move, adversely affecting businesses and local economic development.
- The dramatic in-migration of people from out-of-state with higher spending power is squeezing available housing supply and pushing rents and home prices upward. Low and moderate income households have limited ability to absorb the historically high price increases, and many of Idaho's communities are too resource-constrained to respond to this challenge. This issue has been exacerbated by the COVID-19 pandemic.

- Low income households struggle to access broadband/high speed Internet because is it cost prohibitive or not widely available, mostly in rural communities.
- Stakeholders' solutions to addressing needs largely focus on expanding resources Suggestions included: directing more state and federal resources to help develop more affordable housing; expanding local control over funding mechanisms to support the ability of addressing needs locally; and committing to a dedicated revenue source for housing activities, including more education and training for landlords and property managers. Stakeholders also showed considerable support for more transportation funding for local public transit systems. Some stakeholders also advocated for raising the minimum wage.

Stakeholder respondents. Idaho stakeholders who work in the fields of housing and community development were surveyed as part of the development of this AI. A total of 190 stakeholders responded to the survey. The survey captured their opinions on how housing needs have changed, the most acute housing challenges in their parts of the state, and the presence of fair housing issues.

Overall, respondents were relatively well distributed by geography (Figure V-1). Ada County and the counties in Region 3 (Adams, Boise, Canyon, Elmore, Gem, Owyhee, Payette, Valley, Washington) accounted for nearly half (46%) of all responses. This corresponds exactly with the population distributions for both Ada County and Region 3 counties. Region 4 (14%) and Region 2 (13%) counties had the next greatest proportion of responses; however, both regions are overrepresented in the survey compared with their populations relative to the state (11% and 6%, respectively).

Figure V-1.
Idaho Regions Represented by Survey Respondents



Note: n=137.

Source: 2021 Idaho Stakeholder Survey.

Respondents represented a wide variety of industries. Figure V-2 shows the eight industries/areas of work that garnered the most responses. Stakeholders representing homeless services, affordable housing advocacy, and affordable housing provision had the greatest proportion of respondents (65% collectively).

Figure V-2.
Top Survey Respondents by Industry

Note:

n=189. Respondents were able to choose more than one industry or type of organization they worked for, if applicable. As such, the "% of Total Respondents" column does not equal 100%.

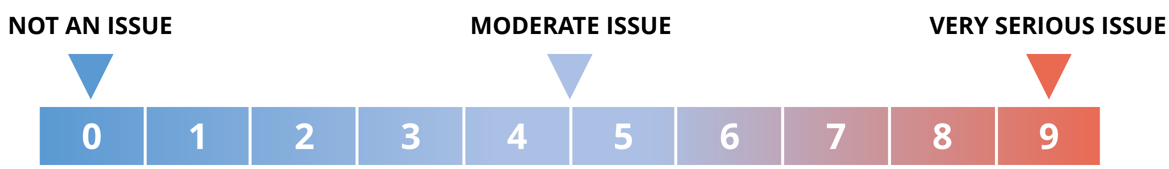
Source:

2021 Idaho Stakeholder Survey.

Industry/Occupation	Number of Responses	% of Total Respondents
Government (state and local)	73	39%
Homeless services	44	23%
Affordable housing advocacy	41	22%
Fair housing	30	16%
Economic development	28	15%
Disability rights/advocacy	25	13%
Supportive services for residents	25	13%

Perspectives on Barriers to Housing Choice

Stakeholders were asked to rate the seriousness of a range of possible fair housing issues in Idaho on a scale of 0 to 9—with 0 being "not an issue" and 9 being "a very serious" issue.



Categories of barriers rated were:

- Housing location,
- Housing availability,
- Housing practices and programs,
- Economic opportunity.

Housing location. As shown in Figure V-3, the most serious fair housing issues related to housing location as rated by stakeholders are:

- Lack of affordable rental housing near employment centers (79% of stakeholders rated this as a serious to very serious issue)
- Lack of affordable rental housing near public transportation options (78%), and
- Lack of affordable rental housing near proficient schools (76%).

The seriousness of segregation and concentration of affordable and accessible housing was mixed. Nearly 50% of stakeholders felt racial segregation of residents was a serious to very serious fair housing issue, while 26% did not consider it a fair housing issue. That said, stakeholders' perceptions of the serious of segregation has increased significantly since 2016, when 16% of respondents believed it was a serious to very serious fair housing issue, while 65% indicated it was a non-issue.

Stakeholders felt that the concentration of rental units accepting housing choice vouchers was a much more serious fair housing issue than in 2016 (58% in 2021, 27% in 2016—a 31 percentage point difference). Similarly, stakeholders who identified the concentration of accessible/handicapped housing in parts of the community as a serious or very serious fair housing issue increased by 33 percentage points (53% in 2021, 20% in 2016). in 2016, only The most significant change, however, was the proportion of respondents who said the lack of affordable housing near proficient schools was a serious or very serious fair housing issue—that increased by 46 percentage points.

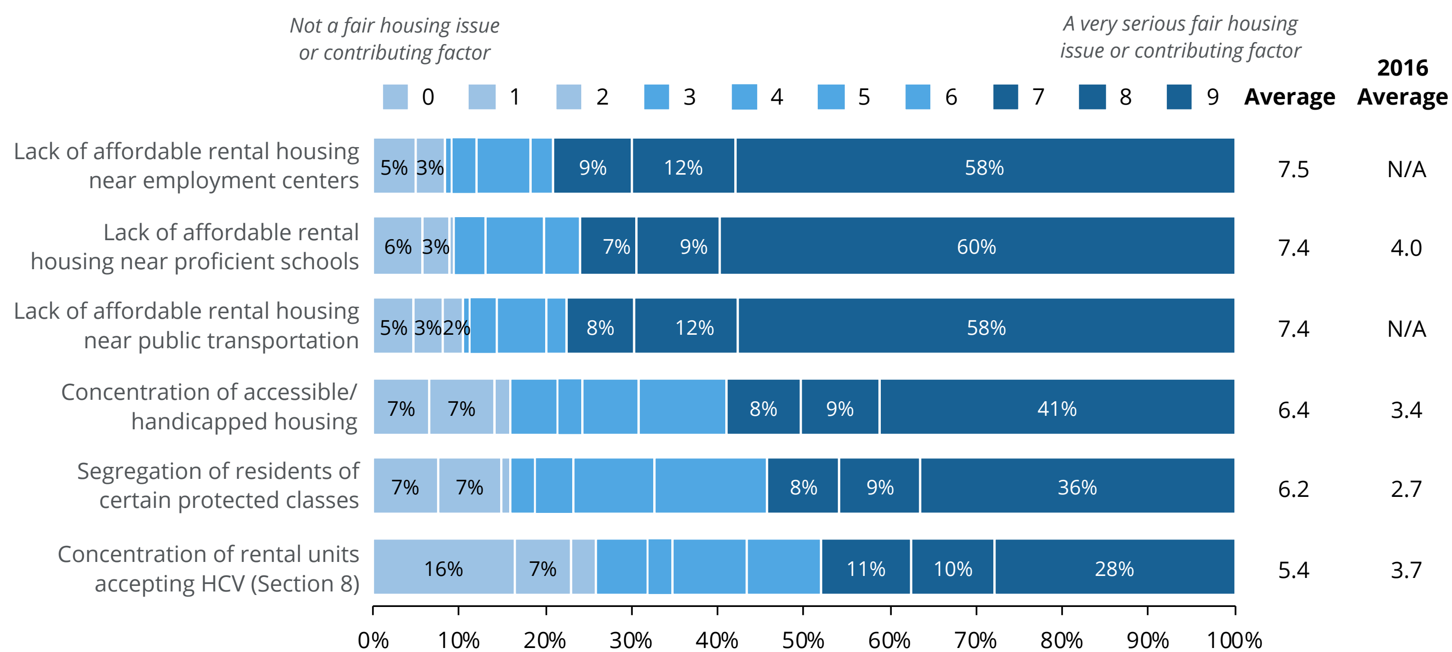
Figure V-3. Stakeholder Perspectives: Rental Housing Location, Segregation, and Concentrations

Note:

n ranges from 107 to 143.

Source:

2021 Idaho AI Stakeholder Survey.



Housing availability. As shown in Figure V-4, the most serious fair housing issues related to housing location as rated by stakeholders are:

- Loss of low-cost or market rate affordable housing (78% of stakeholders rated this as a serious to very serious issue);
- Lack of affordable, integrated housing for individuals who need supportive services (75%); and
- Lack of diverse housing types (75%).

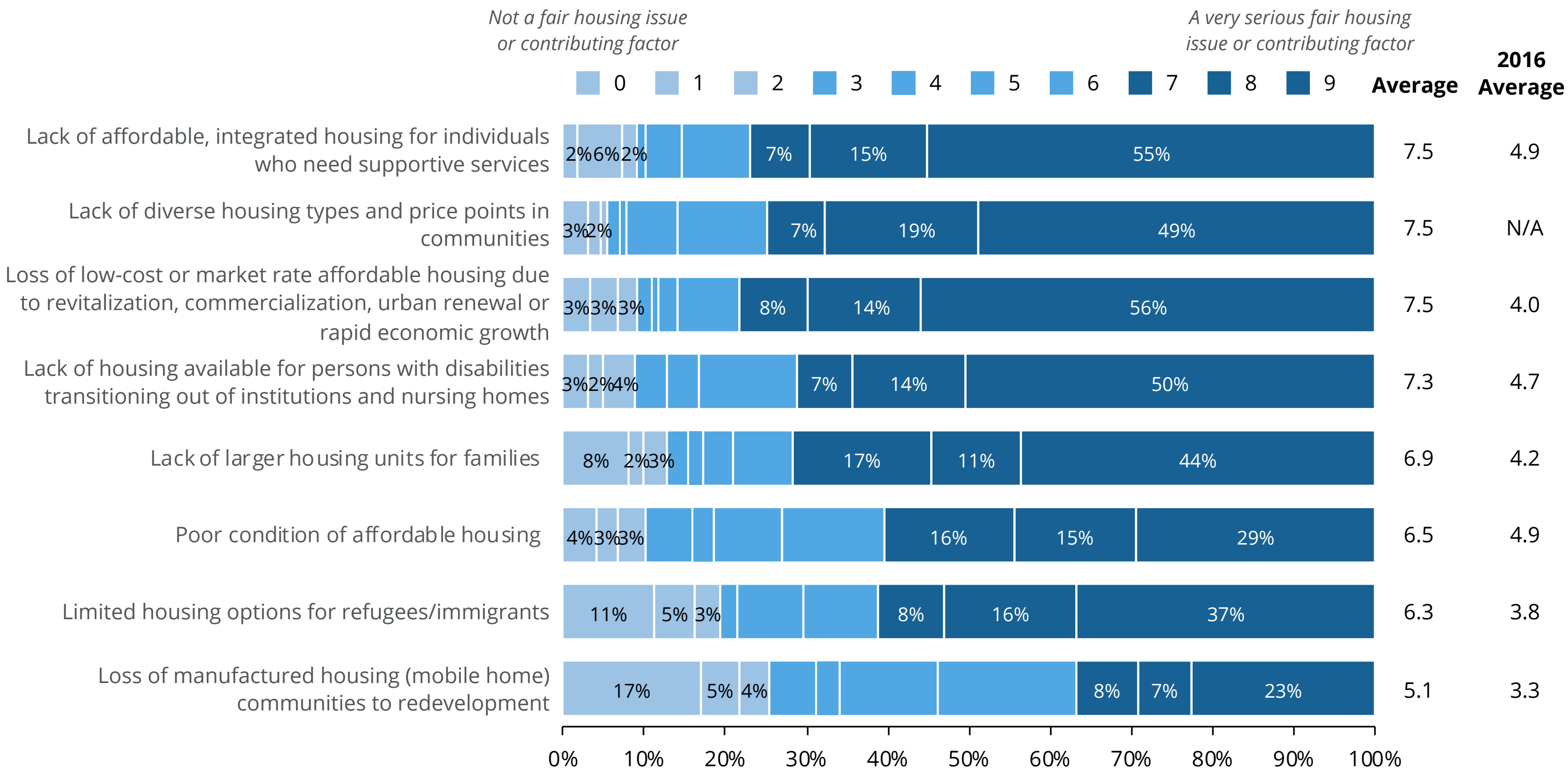
Aside from the loss of manufactured home communities due to redevelopment which 38% of stakeholders consider a serious or very serious issue[1], at least 60% of stakeholders identified housing availability issues (below in Figure V-4) as serious or very serious. This is a major break from how these issues were viewed in 2016. In the 2021 survey, 78% of respondents felt the loss of low-cost or market-rate affordable was a serious or very serious fair housing issue, compared with just 32% in 2016—a 46 percentage point change. Stakeholders who felt the poor condition of affordable housing was a serious fair housing issue increased by 22 percentage points between surveys (60% in 2021, 38% in 2016).

Almost three quarters (71%) of respondents felt the lack of housing available for persons with disabilities transitioning out of institutions was a serious or very serious fair housing issue, compared with just one-third of stakeholders in the previous survey. Similarly, the lack of affordable, integrated housing for individuals who need supportive services was seen as a serious or very serious fair housing issue by 77% of stakeholders, compared to 29% in 2016. And 72% percent of stakeholders identified the lack of larger housing units for families as a serious or very serious fair housing issue, compared to 25% in 2016.

With regard to limited housing options for refugees and immigrants, 61% of stakeholders identified limited housing options for those populations as a serious or very serious fair housing issue, compared to 22% in 2016. . As articulated in many stakeholder comments, the main issue limiting housing options for refugees and immigrants is the lack of affordable housing supply. With the state's vacancy rate at historic lows and no new housing supply being built, protected classes that are most likely to need affordable housing (e.g., refugees and immigrants, persons with disabilities, single-parent households) are being disproportionately impacted.

[1] While the loss of manufactured home communities due to redevelopment garnered less concern compared to other issues, a greater proportion of stakeholders see it as a major fair housing issue more than in 2016 (38% in 2021, 13% 2016).

Figure V-4.
Stakeholder Perspectives: Loss of Housing and Limited Housing Options



Note: n ranges from 98 to 127. The full description for the "Loss of low-cost..." issue is the "Loss of low-cost or market rate affordable housing due to revitalization, commercialization, urban renewal or rapid economic growth or growth of a resort city/community."

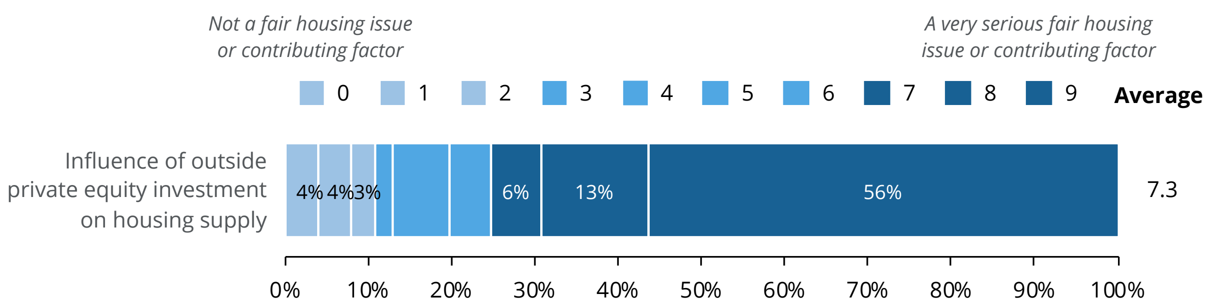
Source: 2021 Idaho AI Stakeholder Survey.

In 2021, stakeholders were asked to rate the effect of outside private equity on housing supply. As shown in Figure V-5, nearly three quarters of stakeholders felt the influence of outside private equity investment on the state's housing supply was a serious or very serious fair housing issue. Only 11% of stakeholders felt outside private equity investment was not a fair housing issue.

Stakeholders attribute the rapid rent increases to investors utilizing homes as short-term rentals, the dramatic increase in in-migration and out-of-state home purchases, as well as the lack of overall housing development throughout the state.

"The pandemic, resulting economic recession and tsunami of private equity have deepened the division between the haves and have nots. The lack of available units at a reasonable price means it's easier to become homeless in Idaho than in the past quarter century."

Figure V-5.
Stakeholder Perspectives: Influence of Outside Investment



Source: 2021 Idaho AI Stakeholder Survey.

The open response comments contributed by stakeholders mostly focused on the loss of NOAH and skyrocketing rents. Related to the former, stakeholders highlighted that because of the dwindling availability of NOAH, many lower income families are being displaced and are forced to look for more affordable options on the periphery of cities. Because these populations mostly work in the service economy and command lower wages, employees are having a difficult time finding replacements. One stakeholder wrote:

"Our local workforce has no place to live. Employers can't recruit employees due to the housing shortage."

A handful of respondents noted manufactured homes or mobile home parks, which are historically more affordable types of housing, are increasingly becoming more expensive and further out of reach for low income families. Moreover, stakeholders also noted that communities are resistant to new manufactured home developments. Another frequently highlighted issue was the lack of affordable options available for large families.

Barriers unique to people with disabilities. Of 108 respondents, approximately 33% responded to a separate set of questions about barriers unique to persons with disabilities. Of those who responded, 88% characterized the availability of housing stock that is accessible to persons with disabilities as insufficient and emphasized the need for affordable, accessible and diverse housing types with on-site support services.

Of 34 respondents, nearly 75% articulated that state and local policies *do not* sufficiently encourage the placement of persons with disabilities in apartments, single family homes and other integrated community settings (12% said state and local policies did this well, 3% said this was done very well).

Fifty nine percent characterized finding information for persons with disabilities on grant or loan programs for accessibility improvements or modifications as difficult or extremely difficult.

The survey asked stakeholders to describe the principal challenges faced by persons with disabilities in their communities in acquiring housing, remaining housed and living in the neighborhood of their choices. Common responses include:

- Lack of available affordable housing options, as well as the lack of supportive services;
- Lack of granting reasonable accommodations;
- Lack of willingness of local governments to provide and allow affordable and visitable units, including permanent supportive housing units, integrated housing units for people with mental illness, and Housing First policies;
- Persons with disabilities feeling socially accepted in their neighborhoods;
- Disproportionate impact of source of income discrimination, as well as income level discrimination (e.g., requiring three times the amount of rent), on persons with disabilities; and
- Need for new construction of homes with basic visitability features and attention to ADA standards in public areas (e.g., neighborhoods, community spaces).

Stakeholders were asked if their communities had adopted a visitability policy or provide incentives to encourage visitability in new housing construction. Only one respondent (3%) articulated their community had a policy or encouraged visitability. Forty four percent of respondents said their community did not have a policy, while 22% were unsure if their community had implemented a visitability policy. Thirty one percent of respondents were unfamiliar with the term. A couple stakeholders noted the lack of visitable units in their communities and unfamiliarity with any Idaho municipalities or counties encouraging this type of housing to be built.

Of 33 respondents, nearly half of respondents articulated that people with disabilities when compared to the rest of the community have less or no access to retail, commercial, or public services. While nearly a quarter of respondents indicated that people with disabilities have the same access to services, no respondents indicated that people with disabilities have more access to these services.

Forty-five percent of respondents indicated that people with disabilities have less or no access to public transit compared to others in the community. Twenty four percent of respondents noted that the same access to transit is available to the entire community while only 6% indicated that more transportation access is more available to people with disabilities. Another 6% noted that no public transportation is available in their community. One stakeholder noted that they were *"unfamiliar with any community that has public transportation that really works for individuals with disabilities."*

Stakeholder recommendations. Respondents provided numerous suggestions to address housing availability (and related affordability) challenges. One reoccurring suggestion was for the State of Idaho to allow local governments to implement their own funding mechanisms to help raise revenue to address their affordable housing needs. This suggestion was also consistently paired with a request for the state to capitalize the state's housing trust fund. Other reoccurring themes, mostly related to housing supply, included:

- Provide more flexibility in local land use and zoning codes to allow for a greater diversity of housing types;
- Allow by-right development of affordable housing developments/different housing types as long as development is compatible with the local government's comprehensive plan;
- Allow for more regulations on short-term rentals (e.g., implement taxes) and out-of-state investment;
- Incentivize or require the provision of affordable units in new housing developments through a variety of means (i.e., deed restrictions, tax incentives);
- Incentivize or require visitability standards to be incorporated into new housing developments;
- Invest in the development of more permanent supportive housing units, stabilize manufactured/mobile home communities to avoid displacement of current residents and speculation, and incentivize landlords to accept voucher holders;
- Raise the minimum wage;
- Add source of income as a protected classes in state fair housing law;

- Institute caps on application and other administrative fees/address other application barriers that disproportionately harm certain protected classes (e.g., proving applicant makes three times the rent, not counting some sources of income such as child support); and

- Provide more landlord education on fair housing and the Section 8 program to address misinformation and perceived difficulties.

Housing practices and programs. Questions covering housing practices and programs covered a broad range of topics, from discriminatory behavior to inadequacy of programs that support housing stability. None of the issues were rated as highly as those discussed above; however, neighborhood resistance to residential development and lack of affordable in-home or community-based supportive services were rated as serious or very serious issues by more than 60% of stakeholders. In 2016, a smaller proportion of stakeholders viewed NIMBYism and community opposition to housing development as a fair housing issue, with only 24% indicating it as very serious.

Overall, respondents identified strong currents of community resistance to affordable housing development and lack of supportive services and accommodation resources for residents experiencing disabilities as major fair housing issues. Stakeholders felt that NIMBYism and community opposition to housing development are serious fair housing issues, with 43% of respondents indicating them as very serious and 67% rating as serious and very serious.

Real estate agents steering protected class residents was seen as a serious or very serious fair housing issue by 36% of stakeholders; another 34% said that steering is *not* a fair housing issue. This is a much lower proportion than in 2016, when nearly 75% of stakeholders felt steering was a non-issue.

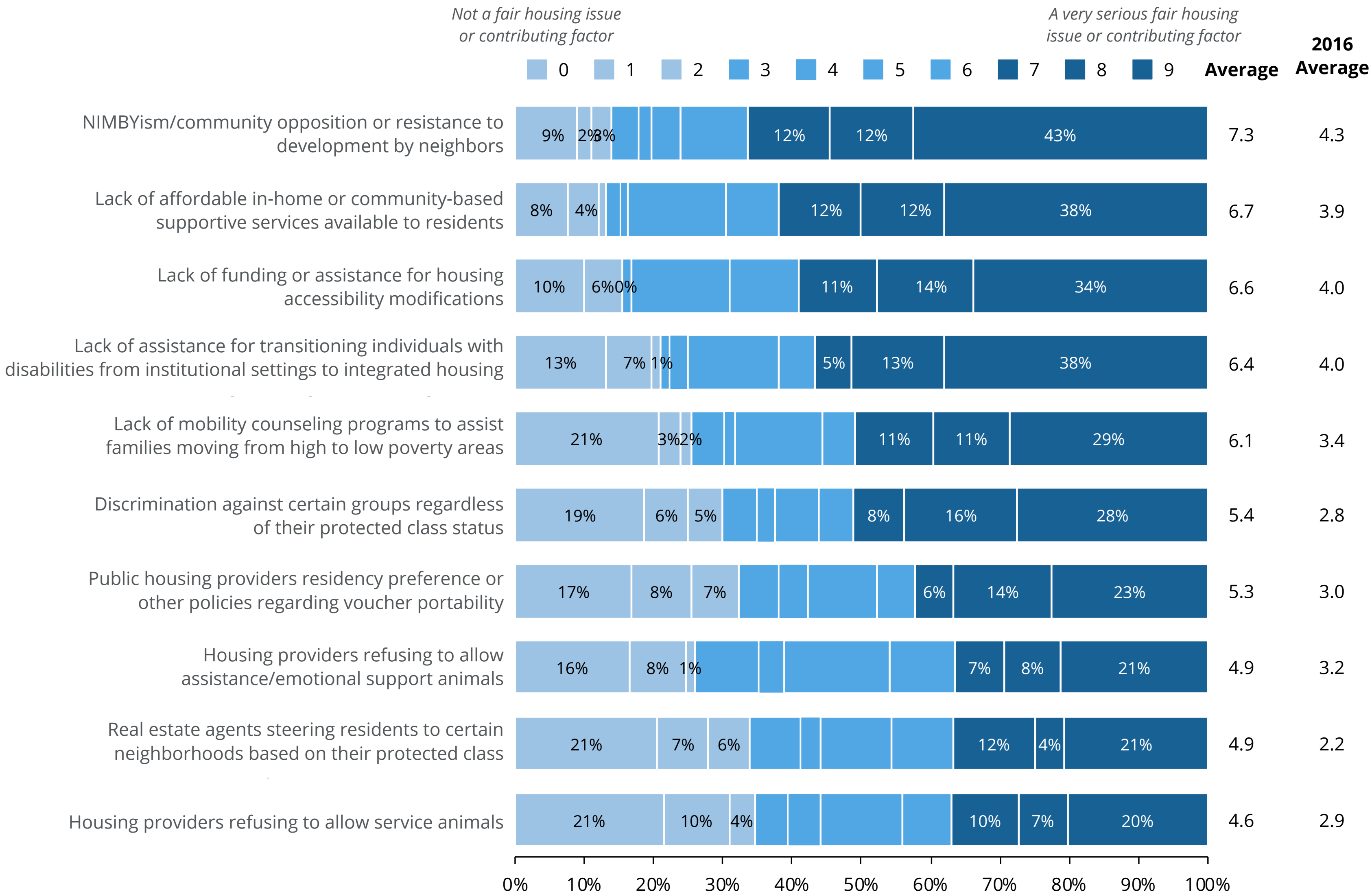
About one-third of stakeholders said that housing providers refusing to allow service animals or assistance/emotional support animals was a major fair housing issue; this is higher than the proportions in 2016 (18% and 21%, respectively). A relatively high proportion of stakeholders disagreed, with 31% and 24% rating these disallowances as non-issues.

With regard to public housing providers' residency preference or other policies regarding voucher portability, the views of stakeholders were also balanced: While 43% considered this to be a serious or very serious fair housing issue, 32% of stakeholders deemed this to not be a fair housing issue. Compared to the 43% of stakeholders in 2021, only 24% found issues around public housing providers' residency preference or other policies regarding voucher portability as a very serious fair housing issue in 2016.

Approximately 52% of stakeholders who responded to the survey perceived discrimination to be a fair housing issue in their community, while 30% viewed it as a non-issue. In 2016, only 19% of stakeholders felt discrimination was a serious fair housing issue, while 58% did not see it as a fair housing issue.

On supportive service programs, the lack of mobility counseling programs was seen as a serious or very serious fair housing issue by a majority of stakeholders (51%), compared to only 23% in 2016. Similarly, the lack of assistance for transitioning individuals with disabilities from institutional settings to integrated housing has also seen a marked increase in the proportion of stakeholders who find it to be a serious or very serious fair housing issue (56% in 2021, 29% on 2016). The lack of funding or assistance for housing accessibility modifications, as well as lack of affordable in-home or community-based supportive services, were described as serious or very serious fair housing issues by the majority of respondents (59% and 62%, respectively) in 2021, but less than a quarter of respondents (23% and 24%, respectively) in 2016.

Figure 6. Stakeholder Perspectives: Community Attitudes, Discrimination, and Supportive Service Programs



Note: n ranges from 63 to 101.

Source: 2021 Idaho Stakeholder Survey.

In the open responses, the major issues highlighted by stakeholders include resistance from residents toward new development, particularly multifamily and affordable housing developments, and upzoning efforts. Stakeholders attribute this resistance to reduced housing production and the concentration of affordable housing in working class or higher poverty areas.

Some stakeholders offered examples:

"[Neighbors file] baseless lawsuits…with the intention of slowing down the development process and hoping to add to the cost beyond the point of affordability."

"Nimbyism is a real problem in our community. Folks don't want growth or development in their neighborhoods but offer no solutions for the people that are already here…."

Respondents also pointed to administrative barriers faced by potential renters in their search for housing, particularly for refugee populations, and the lack of available supportive services for people experiencing disabilities. Specific barriers mentioned included proof of rental or work history, proof of substantial income (e.g. making three times the rent amount), and restrictions on service or emotional support animals. Several stakeholders noted because there is so much current demand for housing, landlords have more leverage to require more from applicants (i.e. rental insurance, extra deposits). Stakeholders also described source of income discrimination as a major fair housing issue.

"This is, simply put, a seller's market. There are hardly any supportive services in place, and no protections for those who cannot afford the exceedingly outrageous rental prices."

"Given the landlord driven market, there is little incentive to understand Fair Housing law. Sadly, for each unit they have, there is someone who will pay what they are commanding."

Stakeholders noting issues with reasonable accommodations for persons with disabilities pointed to landlords being fearful of damage to their properties and the potential loss of income due to delays in getting a unit filled and rehabbing the unit. Additionally, stakeholders articulated a vast need of supportive services for persons experiencing disabilities, particularly for those with household members experiencing mental health issues and those moving from institutional to integrated settings. The lack of available local and state resources and volatility of the industry (e.g., major employee turnover, burnout) were attributed to the deficiency of available, high-quality support services.

"Families with significant mental health issues require a higher level of engagement from the landlord that creates situations where lease violations are used in an attempt to decrease the interactions. Support services would significantly change these situations."

Stakeholder recommendations. In addition to repeated calls for capitalizing the state's Housing Trust Fund and instituting rent control/caps, other suggestions on how to address housing practices and programs are articulated below.

- Strengthen renters' rights through source of income protection and statewide legislation (i.e., Renters Bill of Rights);
- Increase fair housing law education for landlords, property managers, local government staff, and elected officials. Additionally, fair housing education seminars should be required for neighborhood associations;
- Implement public relations campaigns with message on how affordable housing is beneficial for an entire community;
- Increase state funding to group homes to help with stability and financial viability;
- Provide effective incentives to landlords to rent their units to voucher holders or those who might not meet traditional application requirements;
- Increase the amount of funding for supportive services for people with disabilities and houseless individuals. Contract with community based organizations to provide these services;
- Place caps on initial renter fees, including application fee and other administrative-related fees;
- Implement a new fund or pool existing resources for people with disabilities to access to make home modifications for accessibility; and
- Increase the cap on Section 8 vouchers and allow for greater geographic mobility of vouchers for border town residents.

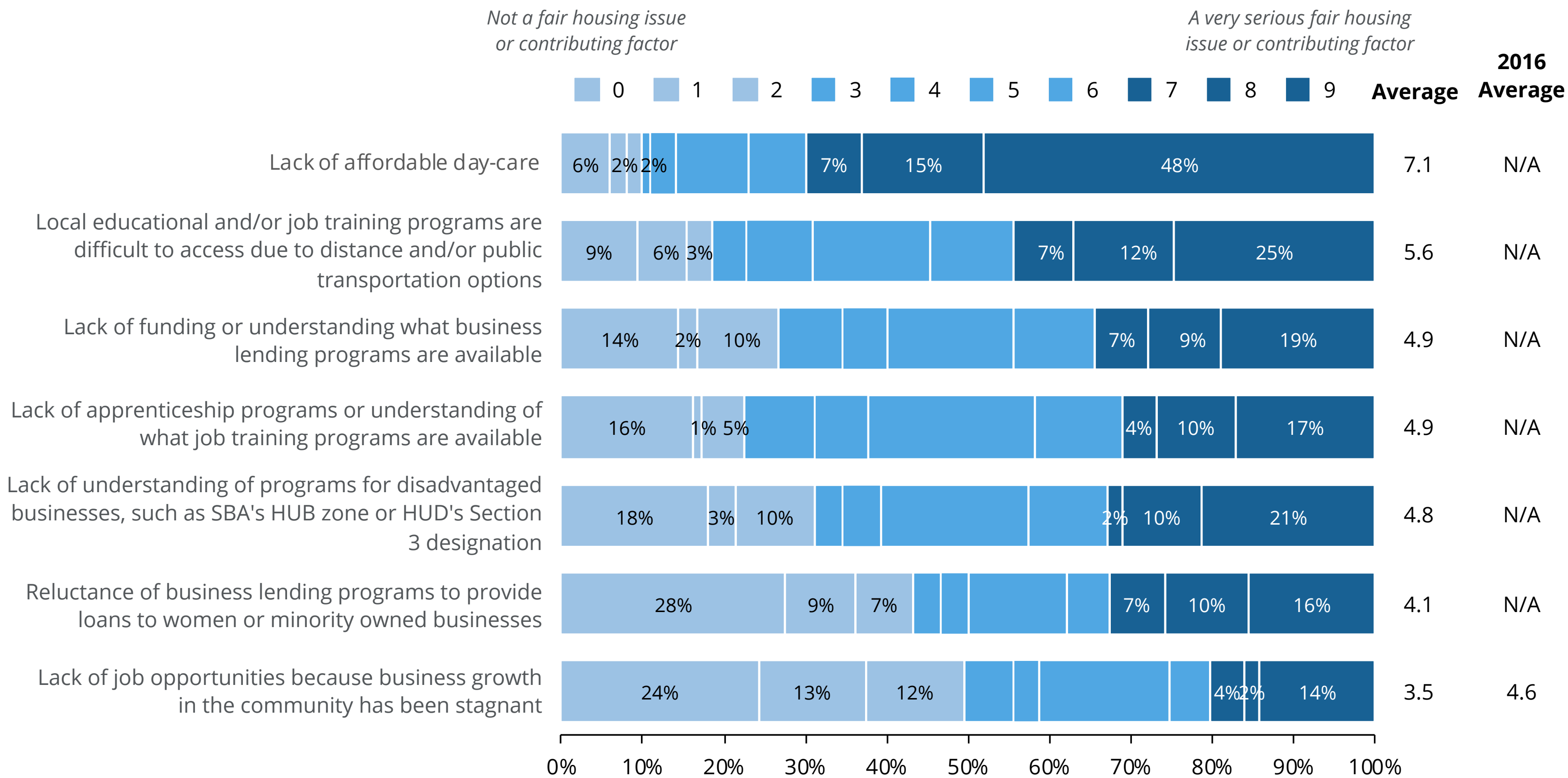
Perspectives on Barriers to Economic Opportunity

Several questions asked about barriers to education, employment, small business development, as well as day care for children and older adults. The only potential barrier to economic opportunity that received a high rating was lack of affordable daycare: 70% of stakeholders rated this as a serious to very serious issue.

The next highest rated issue was lack of public transportation to access local educational and/or job training programs (44% of respondents rated this as a serious or very serious fair housing issue). All other economic opportunity issues related to job training or business growth were not seen as major fair housing issues.

The reluctance of business lending programs to provide loans to women or minority owned businesses was seen as less of a fair housing issue compared to many other survey issues. While 33% of stakeholders felt it should be considered a serious or very serious fair housing issue, 43% felt it was not a fair housing issue. The lack of understanding of programs for disadvantaged businesses was seen as a serious or very serious fair housing issue by 33%, while 31% did not see it as such. In contrast, as mentioned above, stakeholders overwhelmingly pointed to the lack of affordable day care as a serious or very serious fair housing issue (70%), with nearly 50% describing it as a very serious fair housing issue.

Figure V-7.
Stakeholder Perspectives: Employment Opportunities, Job Training and Business Programs, and Childcare



Note: n ranges from 58 to 100.

Source: 2021 Idaho Stakeholder Survey.

Stakeholders expressed greater concerns in the open responses. Many noted that companies are unlikely to move to the state because of the lack of affordable housing supply and increased cost of living:

"Land is too expensive here for large-footprint manufacturing jobs, and the cost of housing is so high, it makes little sense for knowledge-based companies to relocate or grow here because of the salaries they will have to pay employees in order for their workforce to have a decent quality of life."

"Affordable housing for a labor force is the first step. Then we can recruit industry."

"We have a Catch 22 here. No affordable housing for [the] labor force, so no companies [are] willing to establish themselves here. And, vice-versa."

Childcare is thought to be directly impacting housing affordability and housing options. Stakeholders noted that in some instances, childcare is more expensive than rent or mortgage payments, and some families are forced to settle for less-than-ideal childcare situations due to high cost and lack of options. In other instances, families are keeping one parent at home to care for their children because it's more financially feasible. Respondents also described how some low income (and increasingly middle income) families are essentially just working to afford daycare.

"Affordable childcare is one of the major barriers to people being able to work and thus afford housing. Childcare is often as expensive or more expensive [than] housing."

"…[L]ack of affordable day care is an undue burden for families even at middle income brackets, and without proper and acceptable assistance, [it] is out of the scope of possibilities for low income workers."

Transportation access. Several respondents noted that some job training programs are not accessible by public transportation. Others noted that public transportation systems are not designed to serve the people who most need them: Because most public transportation systems don't run on weekends or late at-night, weekend and shift workers have an increasingly difficult time getting around, especially if they don't have a car. For people with disabilities, lack of reliable and accessible public transportation options can have negative logistical and financial impacts on their lives. Public transportation infrastructure (e.g., in accessible bus stops) can also present challenges for those with mobility issues.

"I know many people are unaware of certain programs that may be available in their area. Once they do find one, transportation is an issue because of the lack of running buses or the hours in which the busses run. Or, a person with a disability needs to give a 48-hour notice to be given transportation but that can come at a cost higher than what they can afford."

Additionally, stakeholders noted that many people are not taking advantage of workforce development programs because the current cost of living makes it financially untenable to prioritize furthering their education over having a job. Respondents also pointed to the lack of community and state financial support for expansion of workforce development programs, which is hindering the local workforce from advancing their careers. A few respondents felt that while jobs are available at the higher and lower ends of the income spectrum, there are fewer and fewer available middle-income jobs. Other respondents suggested that business lending programs should work more closely with partner organizations like Community Development Financial Institutions to expand their reach into lower-income communities.

"Given the increasing costs of living, I am not sure that job training programs are in demand. Simply, a household is more than likely going to take a job that provides income vs a training program to prepare them for a job in 6-9 months."

Broadband access. Out of 103 respondents, nearly half indicated that barriers to broadband access exist in their service area. Twenty two percent of stakeholders indicated that no barriers existed while 25% were unsure.

Asked to identify the primary barriers to accessing broadband (respondents were allowed to choose more than one answer):

- 65% of stakeholders said that while broadband/high speed Internet is available in their communities, it is not affordable for low income residents;
- 37% of stakeholders noted that while broadband or high speed Internet is available, it is cost prohibitive to get fast upload and download speeds;
- More than 50% of respondents stated that broadband is not available in rural areas;
- 41% said that it is difficult to find broadband providers or there are too few providers;
- One-third felt the lack of broadband services makes it both difficult to apply for a job and housing assistance;
- 32% said the lack of broadband services prevent residents from getting health care information and assistance;
- 29% said lack of broadband services make it difficult for small business to succeed; and
- 21% said the unavailability of broadband wiring/connection in buildings where low income and/or special need population residents live was a barrier to economic opportunity.

Stakeholder recommendations. Several recommendations on expanding business and employment opportunities, improving public transportation options, and reducing the cost of childcare are articulated below.

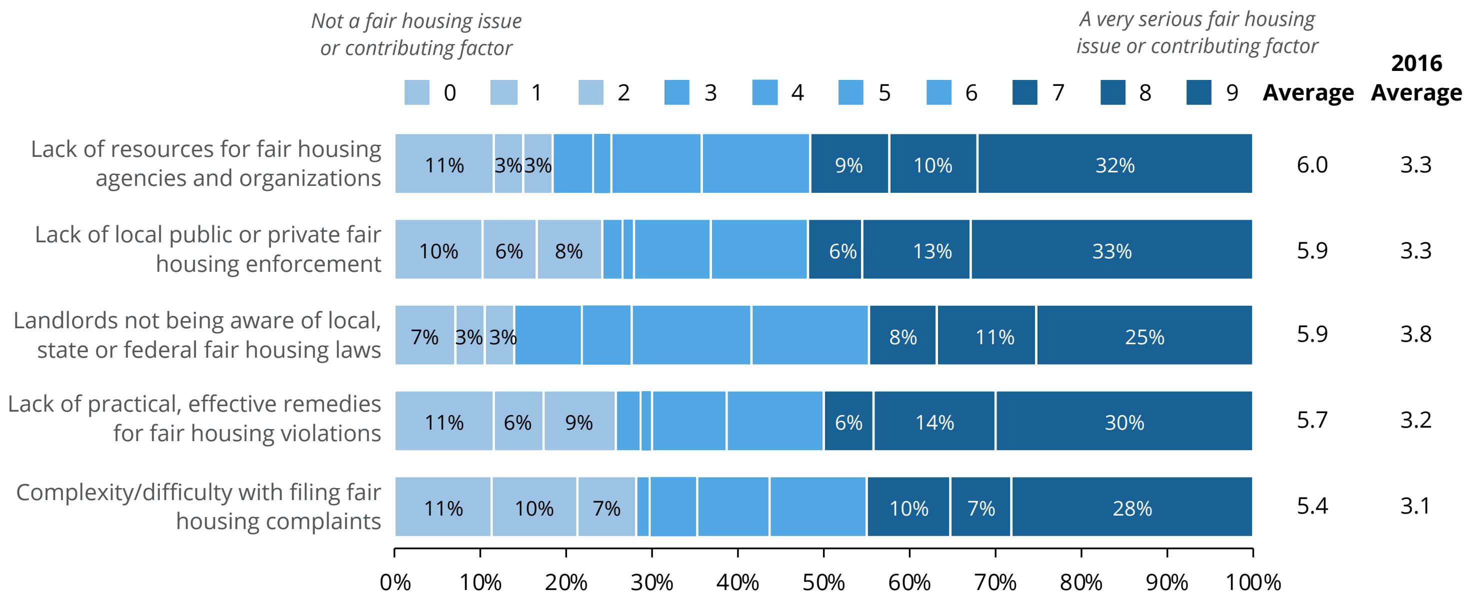
- Increase state funding to provide more access to affordable childcare and early childhood education programs for low and middle income families. Specifically, funds should be used to expand operations for licensed/quality childcare businesses and small day care operators, provide more training for care providers, open more childcare centers, and increased monitoring of facilities to ensure high-quality care;
- Mandate families taking advantage of the Idaho Child Care Program (ICCP) be accepted by private childcare facilities;
- Implement a statewide family tax credit program to assist low and middle income families with childcare costs;
- Provide more robust childcare options that serve shift workers and those who work evenings and on the weekend;
- Expand public transportation options to provide more frequent and reliable routes during off-peak times (including weekends);
- Implement requirements for enhanced accessibility around public transportation infrastructure (i.e., surrounding areas around bus stops and transit stations);
- Offer tax incentives for companies who provide on-site childcare, as well as multi-family unit developers willing to create on-site childcare programs with local childcare providers;
- Provide broadband internet access throughout the state, particularly rural communities, to support business development and entrepreneurship opportunities;
- Provide more robust economic development technical assistance in rural communities;
- Expand job training programs and provide stipends for participants to offset lack of employment;
- Establish public-funded training and job programs with increasing levels of responsibility to enhance competitiveness in the private job market; and
- Expand education and outreach to businesses explaining benefits of workforce development programs, as well as availability of resources to support those in need of assistance in attaining full-time employment.

Perspectives on Capacity and Knowledge

Forty four percent of stakeholders felt that landlords unaware of local, state or federal fair housing laws constituted a serious or very serious fair housing issue. Additionally, more than half of stakeholders felt the lack of resources for fair housing agencies and organizations, along with the lack of local public or private fair housing enforcement, were serious or very serious fair housing issues. A near majority of stakeholders felt the complexity or difficulty of filing fair housing complaints represented a major fair housing issue (45%), as well as the lack of practical and effective remedies for fair housing violations (50%).

The lack of fair housing capacity and resources is a growing concern for Idaho stakeholders. The slight majority of stakeholders identified a lack of resources for fair housing agencies and organizations as a major issue (51%), compared to 17% in 2016. Twice as many stakeholders (44% in 2021 v. 21% in 2016) said that the lack of awareness of local, state, and federal fair housing laws is a serious or very serious concern. These same trends exist in stakeholders' responses bout lack of local public or private fair housing enforcement (52% in 2021, 20% in 2016), complexity and difficulty of filing fair housing complaints (45% in 2021, 19% in 2016), and lack of practical and effective remedies for fair housing violations (50% in 2021, 19% in 2016).

Figure V-8.
Stakeholder Perspectives: Fair Housing Laws and Enforcement



Note: n ranges from 70 to 87.

Source: 2021 Idaho Stakeholder Survey.

The overwhelming theme highlighted by stakeholders in this section was the lack of understanding of fair housing laws among all participants in the housing market — landlords, renters, real estate agents, and the public at-large. Many stakeholders pointed to the fact that landlords are still unaware of the specifics of the Fair Housing Act (one respondent specifically called out gender[2]).

2 https://www.hud.gov/sites/dfiles/PA/documents/HUD_Memo_EO13988.pdf

In addition to landlords, renters, especially those who fall into protected classes, are unsure of how fair housing laws protect their rights.

"...[F]olks that are often impacted by unfair housing practices are unfamiliar with the system and how accountability works. Especially when speaking to folks who arrived as refugees, they are unfamiliar with our systems and bureaucracy."

"Fair housing is not something that seems to be understood as a right for all (homeowners and renters). Realtors don't understand that they can't steer, renters are not provided with choice of housing. [Fair housing] is a complex issue that is only getting worse."

"Few of our clients have had fair housing complaints overall, however the community reaction to the laws, lack of awareness of them, and unwillingness to address concerns is a serious issue."

Stakeholders also said that renters might be reticent or unwilling to pursue a remedy for a fair housing violation because of the tight housing market. Stakeholders described landlords taking advantage of the tight market and disregarding fair housing laws, even if they know better, because tenants are concerned about losing their housing if they bring up an issue. Stakeholders also pointed to the lack of enforcement perpetuating the unwillingness of residents to advocate for themselves.

"Many people don't know about fair housing laws. Landlords are used to getting their way and often flout fair housing laws. In an unprecedented tight market, most tenants are vulnerable and afraid to lose their housing to stand up for their rights..."

"[This is a] sellers' market. Renters simply do not have the power to pursue potential fair housing issues because of the rate at which apartments are disappearing from the market."

"We see A LOT of fair housing issues but there is not really anything that can be done. It is like yelling into a dark hole and waiting to see if you hear an echo. And even if there is a response it creates a power and control issue with the landlords who we depend on for housing families."

In addition to residents' reticence around filing a fair housing complaint, stakeholders identified several barriers related to the complaint process. Some described filing a complaint as "difficult, complicated, and involved," and others noted that renters might not know the appropriate organization to contact. Others noted that the process to remedy a complaint might be delayed due to the organization's lack of capacity and funding.

"Redress of fair housing violations is difficult and lengthy."

"Landlords get away with a lot of fair housing violations and tenants have nowhere to turn for help."

"Legal Aid is the go-to for fair housing issues. [However, it's] virtually impossible to get a legal aid attorney."

"[M]ost landlords are aware but the nature of filing a complaint is complex for residents. No one is filing complaints."

"The folks who do this work are trying, but their options are limited by funding, lawful protections and more."

Finally, stakeholders also expressed frustration about source of income discrimination not being a protected class given that it generally intersects with other protected classes.

Knowledge of fair housing resources. This section also included a series of questions to measure stakeholders' knowledge and awareness of fair housing resources.

Of 101 respondents, 37% of stakeholders indicated that if they wanted to help a client file a fair housing complaint, they would refer them to a local fair housing organization. The next greatest proportion of stakeholders (24%) did not know where to help a client file a fair housing complaint. Other stakeholders indicated they would refer them to a state fair housing organization (20%), use the internet to search where to send them (17%), or refer them to HUD (15%).

For those who answered "local fair housing organization", the most popular organizations noted were the Intermountain Fair Housing Council or Legal Aid. Other organizations noted were Idaho Housing and Finance Association (IHFA), Eastern Idaho Community Action Partnership, and the Community Resource Envision Center. For those who marked "state fair housing organization", the most common answers were the Intermountain Fair Housing Council, IHFA, and HUD, as well as the Idaho Commission on Human Rights.

Fair housing training needs. A slight majority of stakeholders, 56%, indicated that they had received fair housing training in the past. When prompted to identify who provided the training (respondents could choose more than one answer), 68% noted that the training was sponsored by a fair housing organization. Nearly 23% indicated in-house training through their company/organization was provided while 21% received training from a local government.

Respondents were split on whether there was adequate information, resources, and training on fair housing laws in their respective areas. Thirty five percent indicated there was adequate information, while 32% indicated the information provided was not adequate, and another 32% were unsure. One respondent commented that "there is enough training, there is just not much anyone can do about it." Some respondents noted local, county, and state government's reluctance to proactively promote fair housing education. Respondents were generally in support of the educational materials that are already provided but advocated for more creative outreach strategies to ensure the information is reaching more people.

When asked about the types of fair housing activities most needed in their service areas (respondents could choose more than one answer), 78% of respondents expressed the need for more landlord/property manager education. This was followed by resident education (68%) and education/training for local elected officials and their staff (66%). Finally, 45% of respondents believe more training and/or assistance with filing fair housing complaints would be beneficial for their communities.

Stakeholder recommendations. Stakeholders had several recommendations on mitigating several capacity and knowledge issues noted above, mainly revolving around how to increase awareness of fair housing laws and improve the fair housing complaint process.

- Require landlords to hand out fair housing information once a prospective tenant requests or submits an application. This information should be available in several languages;
- Provide state funding to increase fair housing education for landlords, property managers, real estate agents, renters and other appropriate parties. For renters, provide information on how to pursue a remedy if they feel like they have been discriminated against;
- Increase state funding for enforcement protocols or mechanisms to ensure landlords are following fair housing laws;
- Pass source of income discrimination laws;
- Increase funding for Idaho Legal Aid Services;
- Provide services for tenants to help them better understand their rights and help them navigate the fair housing complaint process;
- Provide increased funding for supportive services for fair housing agencies to increase accessibility; and
- Provide mediation services to help create less adversarial relationships between local landlords/business owners and fair housing advocates.

Perspectives on State and Federal Regulations and Policy

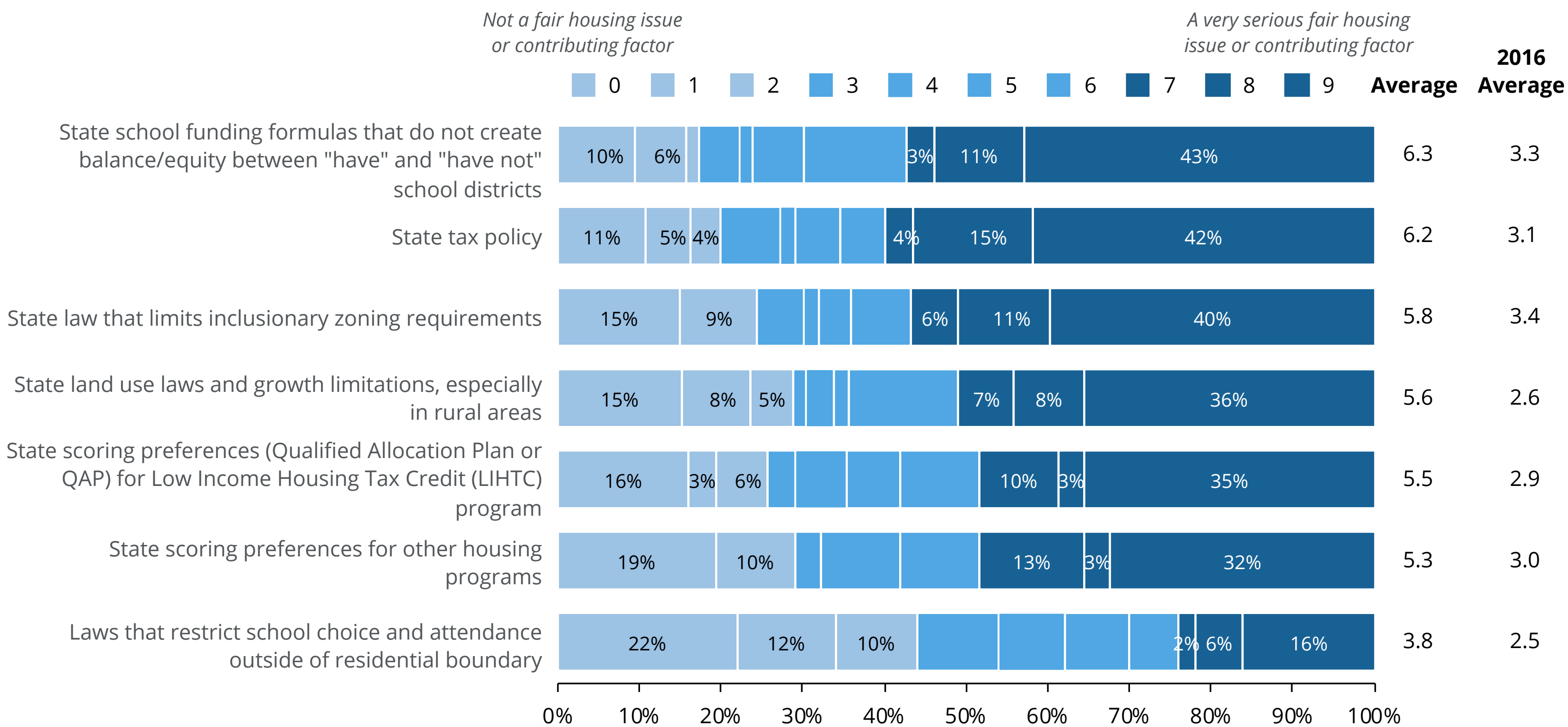
Nearly half of stakeholders felt that current state scoring preferences outlined in the Qualified Allocation Plan (QAP) for the Low Income Housing Tax Credit (LIHTC) program presented a serious or very serious fair housing issue. The same percentage of respondents also considered state scoring preferences for other housing programs to be serious or very serious fair housing issues. This followed with a majority of respondents (56%-61%) who indicated that inequitable state school funding formulas, laws that limit inclusionary zoning requirements, and state tax policy are serious or very serious fair housing issues. However, a much lower proportion of stakeholders (24%) felt laws restricting school choice and attendance outside of residential boundaries constituted a serious fair housing issue; 42% of stakeholders do not believe this is a fair housing issue.

Respondents feel much greater urgency to address these issues than in 2016. In 2016, only 15% of respondents felt the current state QAP scoring preferences were a serious or very serious fair housing issue (v. 48% in 2021. For state scoring preferences for other housing programs, 14% of stakeholders felt it was a serious or very serious fair housing issue (also 48% in 2021).

Fifty one percent of stakeholders felt that the current impact of state land use laws and growth limitations, particularly in rural areas, should be considered serious or very serious. Similarly, 57% of stakeholders believe state law limiting inclusionary zoning requirements constitutes a serious or very serious fair housing issue. State tax policy was also seen by stakeholders to be a major impediment to furthering fair housing in the state, with 61% identifying it as at least as a serious or very serious fair housing issue (42% of these said very serious).

Collectively, 2016 stakeholders felt less strongly about the impact of state land use laws and tax policy on housing development. Only 16% of stakeholders felt that state land use laws limiting growth, particularly in rural areas, were serious or very serious fair housing issues. Stakeholders also expressed less desire to see the state allow inclusionary zoning requirements (57% in 2021v. 25% in 2016), as well as remedying state tax policy that exacerbates fair housing issues (61% in 2021 v. 20% in 2016).

Figure V-9.
Stakeholder Perspectives: Program Scoring Preferences, School Funding/Choice, Land Use Laws, and Tax Policy



Note: n ranges from 31 to 63.

Source: 2021 Idaho Stakeholder Survey.

A major issue flagged by stakeholders in the open responses was local government challenges in funding and managing growth effectively. Many respondents noted that the playing field seems tilted in favor of speculative development while local governments are not equipped with tools to respond appropriately. Stakeholders also noted the need for more flexible land use laws, a more equitable property tax system, and tools to ensure new affordable housing developments are spread across communities, not concentrated in certain areas. Another theme highlighted by multiple stakeholders was the necessity of local governments to have more control over land use to best address their affordability issues.

"Land use laws that discourage density or small-footprint homes work against the growing market demand from first-time buyers and retirees looking to downsize."

"Local jurisdictions, businesses and residents need land use laws, impact mitigation requirements and taxing abilities that make sense and are supported by their communities. Remote rural resort areas are fighting a losing battle to maintain available rental housing to sustain and grow their economies."

Specifically, stakeholders indicated that the inability to utilize tools such as inclusionary zoning or more flexible land use laws is having a major impact on providing more affordable housing options, particularly for lower income families. A handful of stakeholders also expressed concern about the lack of LIHTC developments being built in more affluent areas.

"Not allowing IZ is severely limiting the ability of local jurisdictions to influence the type of developments in their communities. This is causing lower-income families to leave due to lack of available options, which in turn is significantly impacting the labor market for many employers."

"QAP often favors low cost build areas over the high costs where the need is often greater. Any artificial growth limitations are counter-productive in the long run. For areas with an acute affordable housing shortage, limiting tools like inclusionary zoning limits solutions to the problems."

"More flexible zoning to allow for more housing types and alternative ownership models, allow for IZ. Burden on residential taxpayers via business-favoring policies and the tax shift that results by urban renewal districts must be reigned in."

"LIHTC and fair housing law are in conflict with each other. This isn't an IHFA issue, but a regulatory issue that promotes the investment in low-income areas with new projects that are required to be in qualified census tracts."

Stakeholders spoke to needed changes in state tax policy to address disparities between wealthier households and lower income households, particularly for older homeowners or those on fixed incomes who've seen excessive increases in their property taxes. Most stakeholders were concerned with the impacts of the property tax system on education and how it currently exacerbates inequities for low income populations.

"Big issue: property tax system causes disparities between more well-funded areas and not well-funded areas in terms of access to good education."

"High tax areas make it impossible to integrate. Schools are not well funded in Idaho, including colleges and universities."

"State is making it harder and harder to grow a densified city. This impacts LMI individuals. State tax code is a problem."

"The lack of an adequate operating tax base in rural Idaho is an issue. Zoning requirements and regulations, and also growth limitations for development are equally important and should be reviewed."

"State tax policy that places burdens on homeowners and seniors weakens Idaho. The rapid inflation in the housing market translates into ever-higher property taxes that force seniors from the homes."

Stakeholder recommendations. Stakeholders provided several recommendations on how to address the issues articulated above. The overwhelming recommendation in this section was allowing cities to implement inclusionary zoning requirements.

- Amend the state constitution to allow for cities to implement inclusionary zoning policies;
- Allow local jurisdictions more latitude and flexibility to address their localized land use and growth issues, including short-term rental regulations;
- Allow local jurisdictions to make tax decisions and implement fees to support affordable housing development, such as workforce housing and infrastructure improvements;
- Amend state tax policy that rewards speculative investors/development and design a more equitable property tax system. Expand homeowner's exemption to allow seniors and others on fixed incomes to not be priced out of their homes; and
- Ensure the QAP process strikes a balance between Idaho's low cost and high cost areas when siting LIHTC developments.

Perspectives on Local Regulations and Policy

For local regulations and policy, the most serious fair housing issues related to housing location as rated by stakeholders included:

- Lack of local option taxing abilities (63% of stakeholders rated this as a serious to very serious issue)
- Insufficient availability of transportation (63%); and
- Inadequate public transit reliability (60%).

The survey section on local regulations and policy covered a range of local policy areas: zoning and land use; accessibility; public investment; and municipal services including public transportation. These are taken in turn in this section.

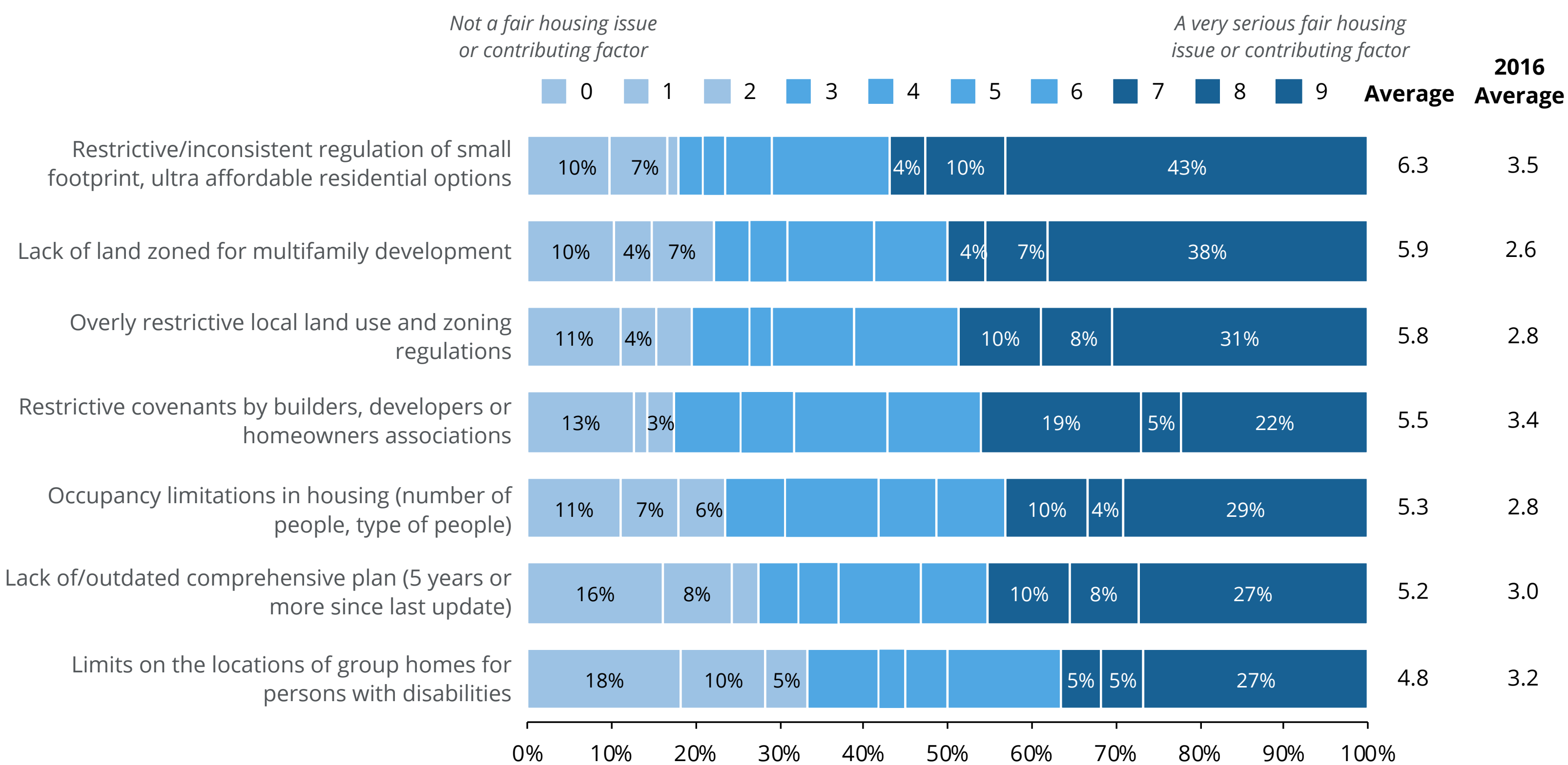
Zoning and land use. The most highly-rated issue was restrictions on smaller footprint homes: 60% of stakeholders said this was a serious or very serious fair housing issue in local communities. This was followed by 50% of stakeholders who felt lack of land zoned for multifamily development is serious or very serious fair housing issues.

Close to half of stakeholders considered the use of restrictive covenants by builders, developers, or homeowner associations as a serious or very serious fair housing issue (46%). A near majority of stakeholders felt similarly about overly restrictive land use and zoning regulations (49%), and 44% identified housing occupancy limitations as serious or very serious. Forty-five percent of stakeholders said the lack of or an outdated comprehensive plan is serious or very serious. Only 15% of stakeholders felt the lack of/an outdated comprehensive plan was a serious or very serious fair housing issue in 2016.

While 37% of stakeholders felt limits on the location of group homes for people with disabilities reflected serious or very serious fair housing issues, 33% of stakeholder did not identify this issue as a fair housing concern.

In 2016, stakeholders did not perceive restrictive regulations to be as serious as compared to the recent survey. Restrictions on covenants (46% in 2021, 13% in 2016), overly restrictive local land use and zoning regulations (49% in 2021, 12% in 2016), restrictive or inconsistent regulations for smaller-sized units (57% in 2021, 18% in 2016), land zoned for multifamily development (60% v. 23%), and lack of/outdated Comprehensive Plans (45% v. 15%) all saw very significant increases in the proportion of stakeholders who deemed these issues to be serious or very serious.

Figure V-10.
Stakeholder Perspectives: Restrictive Regulations



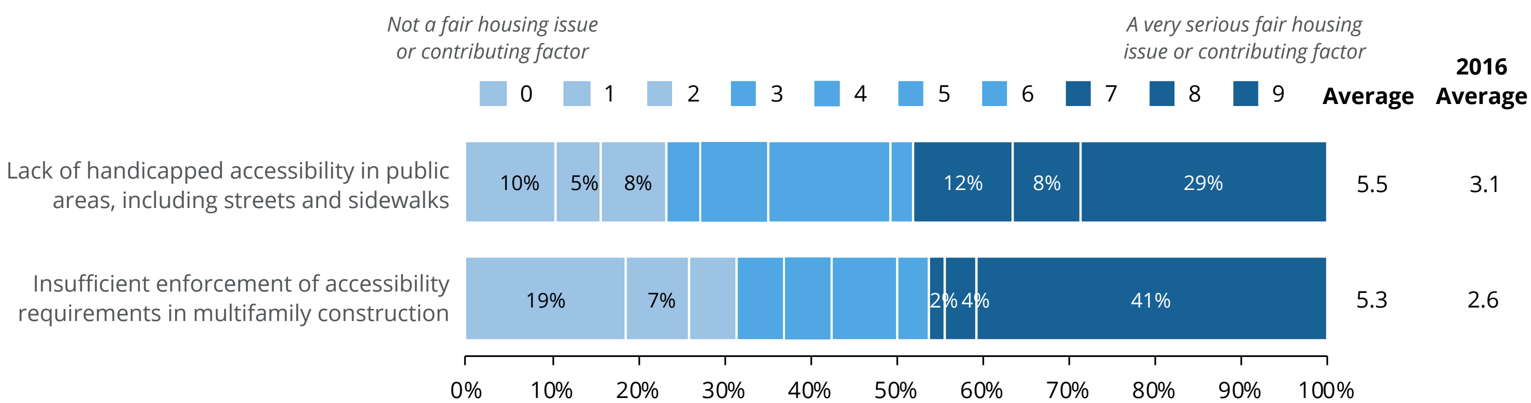
Note: n ranges from 60 to 72.

Source: 2021 Idaho Stakeholder Survey.

Accessibility. Along with 47% of respondents identifying the lack of enforcement around accessibility requirements in multifamily construction projects as serious or very serious, nearly half of stakeholders felt the lack of handicapped accessibility in public areas, such as streets and sidewalks, was serious or very serious (49%).

Comparatively, in 2016, only 17% of stakeholders felt insufficient enforcement of accessibility requirements in multifamily construction constituted a serious or very serious fair housing issue, with 15% identifying the lack of handicapped accessibility in public areas as such.

Figure V-11.
Stakeholder Perspectives: Accessibility

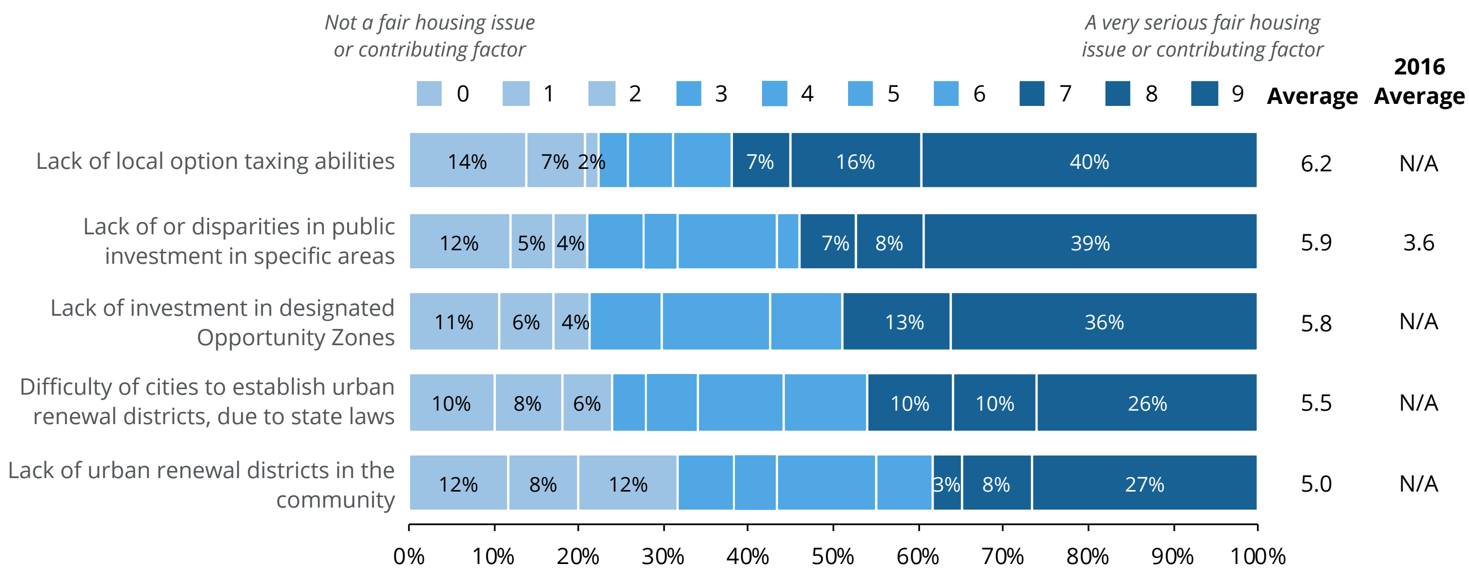


Note: n ranges from 54 to 77.

Source: 2021 Idaho Stakeholder Survey.

Public investment. Over half of stakeholders (54%) described public investment disparities in specific areas as serious or very serious, compared with 25% in 2016. Stakeholders felt the lack of urban renewal districts in the community (38%) and difficulty of establishing urban renewal districts due to state laws (46%) were also serious or very serious fair housing issues. As has been previously articulated, stakeholders feel strongly about the need for more local taxing options, as nearly two-thirds of respondents described the lack of local option taxing ability as a serious or very serious fair housing issue (63%). Forty nine percent of stakeholders believe the lack of investment in designated Opportunity Zones should be considered serious or very serious.

Figure V-12.
Stakeholder Perspectives: Urban Renewal and Public Investment



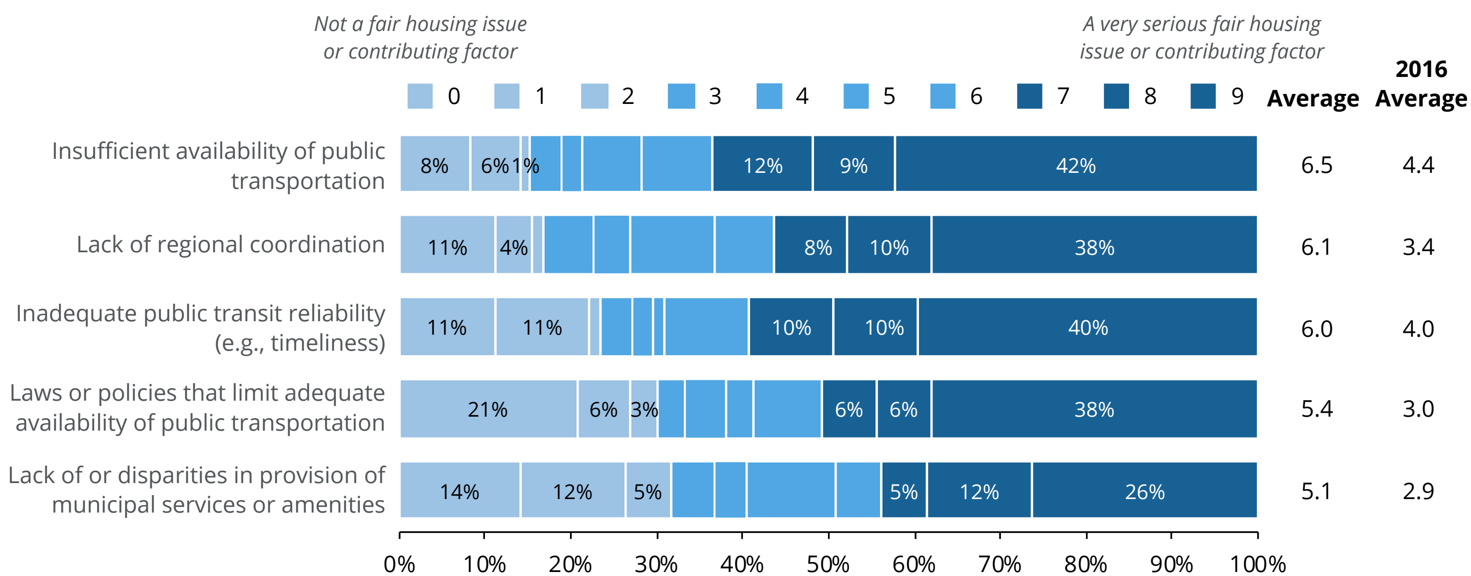
Note: n ranges from 47 to 76.

Source: 2021 Idaho Stakeholder Survey.

Stakeholders also recognize a need for better regional coordination among local municipalities. Over half of respondents (56%) indicated the lack of regional coordination as a serious or very serious fair housing issue, compared to just 22% in 2016. Stakeholders are also much more aware of the lack of/disparities in the provision of municipal services/amenities and their nexus with fair housing. In 2021, 43% of stakeholders considered the lack of/disparities in the provision of municipal services or amenities as serious or very serious, compared with just 15% in 2016.

Fifty percent of stakeholders felt both laws/policies limiting adequate availability of public transportation to be a series or very serious issue. The availability and reliability of public transportation were also flagged as major fair housing issues, with stakeholders describing the insufficient availability of public transportation (63%) and inadequate reliability of public transit (60%) as serious or very serious. These concerns have amplified since 2016, where fair housing concerns over the availability (30%) and reliability (29%) of transportation were much less pronounced.

Figure V-13.
Stakeholder Perspectives: Municipal Coordination and Services



Note: n ranges from 57 to 85.

Source: 2021 Idaho Stakeholder Survey

Major issues identified by stakeholders in the open responses included limitations on housing type and the lack of adequate tools to address growth in both urban and rural settings. In rural communities, stakeholders spoke to current land use laws, community opposition, and the lack of developer incentives as reasons that limited or no development occurs in their areas.

"[In] small rural areas…either we are unable or unwilling to adequately encourage/guide growth in our areas."

"Rural communities did not have desirable ratios and were not able to compete with opportunity zones in urban areas."

"Economic feasibility is a huge factor. Currently, lack of incentive to build multifamily housing in rural Idaho coupled with the local community not having the infrastructure to serve multifamily or a community that will accept it."

Stakeholders also overwhelmingly spoke about the limitations of public transportation throughout the state. Stakeholders directly tied the lack of a robust transportation system to the inability of local governments to implement local option taxes.

"Public transportation only runs during peak hours. If you work outside of these hours and use public transportation, you are out of luck."

"Refugee families, in particular, rely on public transit to get to jobs and health appointments and a lack of options create serious difficulties."

"A severely limited public transportation system in our area is a large issue for people for work and resource accessibility. A lack of public handicap accessibility and the burden of remodel cost on private owners is considered a problem."

Another issue highlighted by stakeholders was the need for more accessible housing options and infrastructure.

"It should be law for any builder to put accessibility requirements in the framing of all new construction. Easier to modify for a person with a disability later."

"Infrastructure (e.g. sidewalks) not always accessible for people with disabilities. Additional example is the inability to access a bus stop via an accessible sidewalk."

Several stakeholders also emphasized the need for regional coordination on housing issues and the unintended consequences when coordination does not occur.

"… The metro area promotes the smaller community as a recreation destination. However, with an influx of visitors, it creates the need for many services and lower paying jobs.[and is] not included in regional housing discussions."

Stakeholder recommendations. Stakeholders provided several recommendations previously articulated on how to address the issues noted above.

- Change zoning code to allow for a diversity of housing types (e.g., missing middle housing options, small square footage homes);
- Provide more state transportation funding to localities;
- Allow local jurisdictions to collect local option taxes; and
- Greater enforcement of accessibility laws by planning departments (e.g. code enforcement).

Perspectives on COVID-19 impact on Unmet Housing Needs

Stakeholders were asked to reflect on the greatest unmet housing needs in their service area prior to the COVID-19 crisis and then describe whether those needs are different than before the pandemic. Seventy five stakeholders provided responses. Major themes include:

The number of Idahoans with severe needs has increased

"COVID 19 has completely changed the remote work environment in this country and that has a significant impact on smaller communities. In the past, small communities were successful because slow growth supported the ability of lower-income families to thrive in those areas. Now that other individuals and families with higher-paying jobs can move into any area and keep that same job through remote work, the small community slow growth model has been completely broken. That is reflected in the rapid increase in property values in almost every small community in the state."

"Far greater number of people in need due to job interruption, lack of childcare, and housing costs greatly outpacing local wages."

"… More people [are] entering the homeless community [and] fewer people [are] exiting."

"There are way many more people in need of housing than before the pandemic. More people are going into homelessness now than before the pandemic and affordable housing is becoming more scarce. Permanent supportive housing is not moving and people are getting into these units."

"Quite simply, lack of available affordable housing, not only for low income individuals but for those who actually support the local economy and community with their work. Teachers, firefighters, police, etc. should not have to struggle to find affordable housing."

Recommendations for recovery

Stakeholders offered advice on what would best support community recovery from the COVID-19 crisis, specific to housing needs. Sixty five stakeholders provided responses. The most salient comments that captured the sentiment of all respondents include:

"Recognize that the landscape in Idaho has changed, the growth indicated in the 2020 Census is a trend that will continue going forward, and if the state wants Idaho to remain a place that hardworking, regular people can call home for generations to come, major policy shifts in housing are necessary."

"Curb speculation. Cur out of state purchases. Or tax these with the intent to use the funds to offer grants to long term community members to get into the housing market."

"Idaho will have to realize that the market is not capable of effectively allocating housing as a good. We will have to prioritize policy and public investment into housing in order to have communities where individuals of all levels of socioeconomic success are able to thrive."

"Fund the state's housing trust fund and use resources to provide housing for those most in need. In high cost areas, recognize that middle income housing needs support at the same level of affordable housing."

Closing Thoughts

In the final open-ended question, survey respondents reiterated the state's dire need for more affordable housing options and the growing negative impacts of the housing shortage on the state's economy. Specifically, respondents called out the need for workforce housing and more strategies and investments to keep Idaho residents from being displaced. One respondent articulated succinctly that "no housing means no employees." Additionally, respondents overwhelmingly argued for directing resources to those who are most vulnerable to losing their homes or are already homeless. Multiple respondents expressed the need for local governments to have the flexibility to increase revenue. Several stakeholders appealed to local governments and the state to use the feedback coming out of this survey to help inform the multi-faceted actions that should be implemented to address the state's housing crisis.

SECTION VI.

COMMUNITY ENGAGEMENT

SECTION VI.
Community Engagement

Development of the state's AI was informed by residents' experiences finding housing. Those experiences were collected through virtual focus groups with stakeholders and residents representing diverse communities across the State of Idaho. From August to October, we held:[1] :

- Three focus groups with advocates in the disability community;
- Three focus groups with advocates in and for the refugee community;
- Two focus groups with advocates for low income households and households experiencing homelessness;
- One focus group with Hispanic advocates; and
- One focus group with advocates for racial and LGBTQ+ inclusion.

These were bolstered by two focus groups with economic development experts from across the state, and nine interviews with IHFA and public housing authority management and staff.

The primary findings and key comments that arose during these focus groups and interviews are summarized in this section, with a focus on three common themes: economic development, affordable housing, and segregation and discrimination. Comments have been anonymized for the privacy of participants.

Economic Development

Residents, housing authorities, and economic development experts alike discussed the ways in which economic growth is tied to housing in Idaho. This section begins with a focus on workforce housing—an area of significant concern across Idaho. It then turn to broader barriers to economic development like education, infrastructure, and transportation.

Workforce housing. Economic development experts and special interest stakeholders repeatedly pointed to housing as a primary barrier to employment. One of the state's economic development experts reported that even where higher-paying jobs

[1] We utilized the Zoom platform and conducted focus groups in English and Spanish and American Sign Language.

are frequently available, the cost of living is out of reach for most. This dynamic traps families in areas where they can afford housing and in low income employment.

Many stakeholders gave more specific examples of issues with workforce housing. For instance, one stakeholder based in McCall described how over half the jobs in the region are in service sectors, typically with lower wages where workers cannot afford housing nearby. Several workers, particularly in the construction industry, were reportedly living in mobile homes outside main employment hubs, some living on Forest Service land. Similarly, an economic development expert indicated there were service workers living in tents near the border outside of Jackson Hole because they could not afford permanent housing close to their jobs.

> **"We seem relatively affordable to other states but [the cost of living] doesn't jibe with our wages."**
> – *Economic development expert*

Another economic development expert in Idaho Falls reported that the Idaho National Laboratory and various mining firms expressed large a need for housing for their workforce, including temporary housing for short-term workers. Some economic development experts noted that larger employers have begun providing housing for their workforce. These mostly include resort operators, many of which have begun providing housing for seasonal recreation workers, and mining firms.

> **"People used to make $15 an hour and be able to live here. I don't think you can rent anything on that wage anymore. It needs to be more like $30 if you're going to get a unit in Treasure Valley.**
> – *Regional housing authority employee*

Another stakeholder out of Nampa shared that the community was trying to hire a policeman or firefighter, but one of the potential hires declined the job because they could not find housing.

Several other stakeholders described local businesses cutting hours because they could not find workers that could obtain affordable housing in the area.

Some stakeholders expressed that housing for people experiencing homelessness was structured in ways that did not allow beneficiaries to find work. For example, a stakeholder located in Boise explained that homeless shelters close at 8 p.m. or 9 p.m., which makes it hard for individuals working in the service industry and doing "shift" work to keep their jobs and have a safe place to sleep. Another mentioned that without access to internet or gas, it was impossible for those seeking housing to find and tour it, keeping them in a poverty trap.

Education. High housing costs have also affected schooling in the state. For example, one stakeholder expressed that, in Mackay, the school did not have a science teacher after the previous teacher quit because she was commuting nearly an hour and a half from a more affordable home in Blackfoot. This phenomenon is also affecting post-secondary education: an economic development expert suggested that Pocatello's affordable housing had been taken up by retirees from out-of-state, and now college students and visiting professors were having a difficult time finding housing.

Post-secondary education has become increasingly important in Idaho according to stakeholders. An economic development expert indicated that, in her community, many workers were previously able to get high-paying jobs and buy a home with just a high school diploma, but that this is no longer the case.

Some stakeholders pointed to a mismatch between skills and available jobs. One economic development expert said the state has "had issues getting folks with technical and soft skills for [the] ever changing business environment." But that "community colleges are doing a better job now" because of increased offerings that prepare students for high-demand jobs.

The most significant labor shortage is in health care. That expert described Idahoans who have had to wait eight or more months to get basic medical treatment, and attributed the shortage to a lack of training programs for medical professions, suggesting the initiation of a state medical college to train nurses and specialized medical positions.

Care infrastructure. Limited health care access can be a problem for workers: poor health often limits their ability to work. Lack of access to other important infrastructure, like broadband and childcare, have also hindered economic development in the state.

> "For businesses in rural Idaho, childcare is the biggest issue. Entrepreneurs can't juggle both."
> – *Economic development*

Several economic development experts suggested that inadequate or unaffordable childcare complicated employees' ability to get to work. For example, one expert near McCall said that childcare was a huge issue in manufacturing industries in the region, where many workers wanted to add another shift to their line but could not find care during those hours. A stakeholder responsible for rehousing families experiencing homelessness in Boise also suggested that childcare was a major hurdle for families trying to get back on their feet. Ultimately, many residents and stakeholders were concerned about both health care and childcare infrastructure.

Broadband. Others were particularly concerned about broadband access, particularly in rural parts of the state. One economic development expert explained that Arco is considered a "well served" broadband community because the local hospital received fiber-optic internet. Yet nobody else in the community has access. Because of the hospital's connection, the town does not qualify for broadband infrastructure improvements. Another economic development expert in Northern Idaho expressed the same concerns, noting that having lower thresholds to qualify for broadband funding would be helpful for residents and businesses.

> "In small towns, people can't start businesses without internet. Broadband is a must."
> – *Economic development*

Transportation

Along with access to health care, childcare, and broadband, access to reliable transportation is pivotal to Idaho's economic growth. Most stakeholders emphasized that a car is necessary for residents living in any part of the state. However, several Idahoans cannot afford a car, or often own unreliable cars, which jeopardizes their wages and work opportunities. One stakeholder from the Hispanic community specifically discussed how many farm workers do not have access to a car, and that they often have to rely on the farm owners' cars for basic needs (e.g., getting groceries and only on Sundays). Another stakeholder explained that a lot of older Hispanic women work, but do not know how to drive. They therefore often rely on rides from family members or walk to work.

> "Having a car is absolutely necessary here in Idaho. Just to get to the grocery store you need a vehicle. But there is a huge part of the [Hispanic] community that can't afford it, so they double up or get rides."
> – *Regional stakeholder*

For workers who keep moving further from their place of work in order to find housing, transportation presents new challenges. Longer commutes mean higher expenditures on gas and car maintenance. Car repairs present unexpected expenses that can take months for families to pay off. Many families in a resident focus group noted they only had one vehicle, and workers were often forced to take time off from work (sometime without pay) if other family members needed transportation for other things such as medical appointments.

Others in the Coeur d'Alene area explained that the public transit options were minimal, covering limited areas with infrequent routes—so limited, in fact, that one stakeholder worked with someone who used a cane and was walking 7 miles to work each day. Another stakeholder living close to the Washington border explained that Washington State University and the University of Idaho are not far apart, but there is no longer a bus route between the two, which limits opportunities for work and collaboration. They also explained that most of the shopping areas were in Moscow, but that many residents cannot get there without a car.

A stakeholder working with low income households in Coeur d'Alene also expressed concern that many residents are unable to get medical services because they cannot get transportation to Spokane, where most medical provisions are homed.

Issues such as these were brought up by numerous stakeholders across the state, including areas with more robust public transit like Boise.

"If you live kind of close to downtown [Boise], you can get around faster on a bike than you could in car or bus. But if you live in surrounding cities, Caldwell for instance, where employees live, and your car breaks down, there are no other options." – *Regional stakeholder*

Many Boise-based stakeholders commented on the current state of public transit in the city. Some expressed that reliable service only exists in the higher-income areas and that service to lower-income neighborhoods is spotty at best. Several expressed that transportation challenges were particularly prevalent in the communities surrounding Boise, where many low-wage workers now live because they cannot afford housing within Boise. For example, one stakeholder explained that there is no way to get from Caldwell to Boise in a timely way without a car, which has been especially challenging for students and low-wage workers.

Where public transit does exist in the Boise area, many said it runs irregularly on the evenings and weekends. Stakeholders explained that this is a hinderance for low-wage workers, especially those working on weekends or in the evenings. One stakeholder who helps resettle refugeees in the Boise area said "nothing runs past 9 p.m." This same stakeholder commented on the high cost of public transit, especially in relation to the low wages that refugees earn, as their education and training from their home country is typically not counted in the U.S This stakeholder also explained how minimal access to public transit is especially difficult for refugees, who often do not have drivers licenses upon arrival, work evening and weekend shifts at low-wage jobs, and rely on transit to get to English language classes where they have an opportunity to establish relationships with other immigrants, build community connections, and prepare to enter the workforce.

"I have a group of friends who live in across town, but they might as well live in another country. My ability to go meet up with them is something I always have to think about. Can I afford it? How long will it take? Transportation is such a huge part of this [isolation]."– *Regional stakeholder*

Stakeholders working to resettle refugees in Twin Falls were happy to be connected to College of Southern Idaho, which has a fleet of cars to help refugees get to their jobs. This has helped many refugees earn enough money to buy cars for themselves. Other groups working with refugees noted that employers should help provide transportation, particularly because many are currently desperate for workers.

For the refugee community and for people with disabilities, public transportation is also essential to community building and to reducing feelings of isolation. One stakeholder explained that people who are blind or low vision are unable to drive and are thus limited to living in places with decent transit connectivity. Another stakeholder in Canyon County explained that if residents with disabilities are not near a bus stop, they cannot get access to basic amenities like the grocery store. This stakeholder and others emphasized that affordable and accessible housing must be built near transit hubs.

In addition to reliable transportation, many advocates in the disability community emphasized issues with urban infrastructure. For instance, curb cuts that do not line up, are inconsistently placed, and/or a lack of audible street-crossing signals. For blind residents and those in a wheelchair, roundabouts, which are becoming increasingly common, can be treacherous to cross because they can block drivers' views and are difficult for pedestrians to navigate. Many areas across the state do not even have sidewalks near necessary amenities. For instance, a stakeholder in Lewiston explained that there are no sidewalks near the most affordable grocery store in the area, so many people are forced onto the streets.

"I'm blind, so in making choices about where to live, I need to consider whether there is a bus route, safe street crossings, and accessible pedestrian access routes." – *Regional stakeholder*

Solutions and suggestions. Some stakeholders highlighted the efforts of certain communities as best practices that others should adopt. Disability advocates were pleased that Coeur d'Alene had recently improved access to many recreation points, including a wheelchair accessible beach dock. Moscow was also commended for having adequate parking spaces on each block.

In terms of improved public transit access, many residents and stakeholders expressed a need for later and weekend transit hours on existing routes, and expansion of routes to areas where low-income workers need it most. Several stakeholders expressed a desire for transit services that connected towns more efficiently. For example, several noted a bus or train connecting Spokane to Coeur d'Alene would be useful for workers who already drive the I-90 corridor every day, and for Idahoans seeking health care services in Spokane. Others specifically noted a need for routes connecting Boise to nearby communities, with one stakeholder specifically mentioning a train connecting Mountain Home to Boise.

Several stakeholders acknowledged a lack of funding for public transportation. Some noted recent ballot measures to increase car registration costs or gas taxes but felt as though they did not know where such revenue was spent.

Affordable Housing

In nearly every interview and focus group, participants noted a recent spike in housing costs and a reduced supply of affordable housing. One stakeholder, for instance, described the housing situation in Coeur d'Alene as "not just bad, it is dire." Some perceived the housing crunch as driven by an influx of wealthier, out-of-state in-migrants purchasing second homes or working remotely from Idaho during the pandemic. These challenges used to exist only in the state's resort communities and the Boise metropolitan area and are now widespread.

Disproportionate impact. The state's growing housing challenges impact some residents more than others. Many advocacy groups have a difficult time finding housing for the communities they serve. For example, a group working to rehouse LGBTQ+ residents who have been kicked out of their homes when families do not accept their gender or sexuality said there were no longer affordable housing units available to rent.

> **"Butte County hasn't needed more housing until last year. You could buy a home for around $70K, but now a house goes for around $140K. However, there's no inventory left. And Butte County Planning has no new building permits in the pipeline."** – *Economic development expert*

Similarly, groups working to find housing for residents with disabilities explained that supply of housing is currently a bigger issue than getting a Medicaid waiver to pay for housing: "Even if we get a waiver, and if the money follows the person, there is nowhere for them to live." Another stakeholder explained that many of the people with disabilities in Boise had to buy and rent more affordable homes in Southwest Boise where there is no bus system, which deepened their feelings of isolation. Also in the Boise area, a group working to rehouse people experiencing homelessness felt similar constraints: one advocate said, "In all these communities there isn't any housing. I've done this for 13 years and there is a marked difference post COVID than there was before COVID. It had been getting very hard for years before COVID, but now it's impossible."

A similar group in Northern Idaho explained that they had several individuals who were ready to leave group institutions but could not find affordable transitional housing. This was especially pronounced during COVID, when advocates tried to reduce those living in group quarters to limit virus spread. These efforts were costly: the group had to house people in motels at a rate of $1,000 per week, sometimes for several months during the pandemic.

Households at risk of homelessness. Stakeholders across the state expressed concerns about how the affordable housing crunch was affecting rates of homelessness.

> **"We're seeing lots of folks who have been renting the same place for years but now they're being priced out, can't find another place, and end up in shelters. We have lots of people who have never imagined being in a shelter and are showing up totally panicked--people who have never been anywhere close to homeless before."** – *Regional stakeholder*

Many described experiences where long-time residents were being priced out of their homes. One stakeholder in Northern Idaho described the experience of a family with a mother who was working, a father who was disabled, and three children. This family's leaser decided to increase monthly rent by $200, and when the family could not afford it, they were kicked out. The stakeholder explained that this type of situation was happening more frequently in recent years. Others in Southern Idaho described similar experiences. One noted a property owner who decided to sell a home while it was occupied by a tenant sick with COVID, making the tenant effectively homeless while recovering from the virus. Others in the Boise area said they had witnessed some large increases in rent which forced residents to move, describing rent increases between $600 to $1,000 per month from one lease term to the next.

Experiencing homelessness, being unsheltered, or living in temporary housing often have dire consequences for an individual's wellbeing. For example, one stakeholder working with refugees explained that recent housing instability has meant new refugees cannot focus on learning English, which means they cannot settle in their new communities. Others in the LGBTQ+ community explained they often experience sexual violence in Idaho shelters, which has evolved to a lack of trust between the LGBTQ+ community and social services broadly.

Other stakeholders expressed frustration with restrictions on residents experiencing homelessness. For instance, one mentioned "About five years ago Boise did a 'clean up' and displaced all homeless people living under a bridge. They put in hostile architecture like rocks and installed a skate park." A similar narrative was expressed by stakeholders in Northern Idaho, where one said, "An agency got money to put up a temporary tent city for people experiencing homelessness and law enforcement tore it down 2 days later."

Other barriers were reported by those working to rehouse individuals experiencing homelessness. One noted that, in order for households to receive assistance, they have to have been unhoused for a certain amount of time, meaning people who are couch surfing cannot qualify until they are truly unhoused. Another stakeholder pointed cross-purposes within the Housing Opportunities for Persons with Aids (HOPWA) program: HOPWA funding can only be used once an individual has a termination notice or a utility shut-off notice, which may negatively impact a residents' credit score and reduce their chances for finding housing in the future. Both expressed a desire to circumvent these regulatory barriers in order to get help to people before their situations got too dire.

Hearing from housing authorities. Publicly supported housing plays a critical role in Idaho's affordable housing market and in many parts of the state is the only type of housing available for very low income households. Based on interviews with several members of IHFA and public housing authorities, many perceive that publicly supported housing, like Idaho's housing market in general, has been under strain recently.

> "We had almost 40 applicants for our housing units, of only 56 total units, so that could be a really long waitlist because there isn't a lot of movement out of those family units. However, we saw more movement in the past year because many people who were close to maximum income rates, and the COVID funds helped them come up with money to move into mainstream housing. Some of them bought houses and others were finally eligible for Section 8 housing choice vouchers." – *Local housing authority*

Those working with Idahoans to help them purchase homes discussed recent affordability crunches. One noted that many younger Idahoans are reaching a point where they would be able to buy their first home but are being priced-out in areas like the Treasure Valley and Kootenai County. She noted that this has meant more households are continuing to rent, which pushes lower-income renters out of the market. Moving these households into ownership would help stabilize the rental market.

Many housing authorities mentioned long waiting lists and an inability to assist households that need affordable housing the most. For instance, one housing authority employee mentioned that they are only able to meet 20% of the community need. Another who manages project-based voucher housing and public housing said that the wait time for a one-bedroom or two-bedroom unit is currently three years. Many stakeholders mentioned that the decline in Naturally Occurring Affordable Housing (NOAH) was causing people to remain in public housing for longer periods of time. One stakeholder said, "The low vacancy rate contributes to the problem. We are seeing people that are moving in and then not moving out [of public housing]. They have nowhere else to go, even if they don't like the unit or it doesn't meet their needs."

In the unique markets of Jerome and Twin Falls stakeholders reported that public housing tenants were still able to find affordable rents in the private market once they had achieved stability through public housing.

Many housing authorities are finding it more difficult to place voucher holders into rental units. Some find that many property owners who would previously rent to voucher holders are no longer doing so. Many suggested that property owners were selling their homes or renting at higher prices, which displaced many voucher holders. Other property owners have been less willing to negotiate with housing authorities or have been entirely unwilling to rent to voucher holders. For example, several property owners have been pulling away from the voucher program because they can afford to get higher rents elsewhere. One housing authority employee noted that they currently had 100 to 125 voucher holders still searching for units.

> **"We are flooding the market with vouchers because we are trying to get our voucher utilization increased, but they have a hard time finding units. We have the funding, we have the vouchers, but not the space."** – *Local housing authority*

> **"The number one challenge has been skyrocketing rent levels and the inability of voucher funding to come close enough to negotiate with landlords to drop rent. We have to [convince landlords to] drop rent by just $50 a month to secure rent, but now it's a $250 to $500 difference."** – *Local housing authority*

A number of individuals working at housing authorities expressed a desire for more support services. Many noted an increasing number of individuals with cognitive impairments or mental health difficulties, and wished for better collaboration with health care resources. One said, "When we have tenants that are struggling with mental health issues, we don't have resources to get people the support they need. I'm scared that something will happen and [they] might be cut loose and then won't have housing or continued support. It all spirals quickly with no support."

Community perceptions about affordable housing. Several stakeholders and housing authorities noted that they have often been met with resistance from community members when trying to promote affordable housing. One economic development expert explained that he had seen a lot of resistance to apartment projects – even market rate and luxury products—because community members feel they are going to "destroy" neighborhood character and property values. Another economic development expert explained that "maintaining way of life" centered around agriculture and single-family homes is the number one priority for a lot of communities and that there is often pressure to keep open spaces as they are.

Stakeholders' experiences with NIMBYism came up often, as did a broad perception of "those people" who use of affordable housing. For instance, one stakeholder in Nampa shared that some community members expressed that they did not want 'those people' in the town and that they would need more police if a new affordable housing project were undertaken. Another public housing official noted that many property owners do not want to rent to voucher holders, referring to them again as 'those people.' However, as one economic development expert put it, "*Those people* are small business owners, people actively involved in the community." Several noted that lots of rural residents with such attitudes actually qualify for affordable housing programs. Some stakeholders suggested housing authorities should market these programs differently—i.e., as rural workforce house, or as a way for current residents' grandchildren to stay in Idaho.

Regulatory barriers. In addition to community perceptions about affordable housing and its residents, several stakeholders noted regulatory barriers to affordable housing development. For example, one economic development expert explained that, until recently, Meridian had a regulation that required "a huge garage and huge square footage– it priced out starter housing entirely." Another economic development expert lamented that many communities did not easily permit multifamily housing developments and had very strict lot size minimums and parking requirements.

Other communities simply do not have the infrastructure capacity to develop affordable housing. A McCall-area economic development expert explained that there was recent interest from developers to build more affordable, multifamily housing, but they could not get the sewer connections in a way that was not cost prohibitive. Other communities are entirely unfamiliar with developing multifamily housing. One economic development expert noted that even if their community wanted to upzone, planning staff do not have the experience to do so; that process does not even exist. This individual expressed that their community needs guidance from more urban community developers on updating water and sewer capacity, setting rates, and developing new multifamily housing.

"The City of Arco has not had any new subdivisions or housing since the 1960s. At the last council meeting, we had inquiry about a vacated subdivision to place 100 manufactured homes there, but there is no current application in the pipeline. We have some inexperience with processing development."– *Economic development expert*

Solutions and suggestions. Many stakeholders, housing authority employees, and economic development experts had suggestions for improving the issues that come with limited affordable housing. Some mentioned bolstering tenant rights in the state, through rent stabilization policies or by increasing the number of days tenants can stay in their homes upon eviction. Others recommended mediation services between tenants and property owners so that tenants feel more supported. For limited English proficiency populations, others suggested providing language interpretation services to property owners so that tenants and property managers can communicate effectively and in ways that reduce evictions. In particular, one stakeholder mentioned that COVID rental relief funds were out of reach for many households that did not speak English because they could not navigate the funding process without a translator. Many hoped translation, mediation, and improved tenant rights would help keep people in their homes, even as prices go up.

Residents noted local food banks were helpful during the pandemic, especially as housing prices were increasing and wages remained constant. In addition, they noted financial assistance to help pay utilities and rent was very welcomed. Some noted that deposits are becoming a larger challenge for people looking for housing, and financial assistance with deposits would be helpful.

Many stakeholders from the disability rights community hoped for more accessible housing units, and some had suggestions on how to increase accessible housing supply. One stakeholder recommended an incentive structure at the state level for builders and developers who include universal design and accessible neighborhood planning in their builds. Many suggested improved education and outreach, hoping to inform developers on the salability of visitable, accessible, and age-in-place housing.

Several stakeholders expressed a desire for increased flexibility at the local level to generate and spend revenue. Others hoped inclusionary zoning policies, land trusts, or water and sewer grants might help spur affordable housing development.

Segregation and Discrimination

Though housing discrimination and segregation were not recounted in every focus group and interview, many stakeholders, housing authority employees, and residents had experiences with or had witnessed discrimination.

Race, ethnicity, and national origin. Several stakeholders and residents brought up housing discrimination and segregation based on race, ethnicity, or national origin.

> **"White folks pretend to talk the talk about Black Lives Matter, but don't want Black people to move into neighborhood. They don't want affordable housing developments."** – *Regional stakeholder*

Stakeholders among the Hispanic community pointed to housing segregation in the state and poor housing quality for Hispanic farm workers. One stakeholder noted that labor camps previously used as Japanese internment camps are still being used to house Hispanic farm workers. Another noted that several farm workers lived in uninhabitable conditions on farmers' properties. Stakeholders in the Hispanic communities also mentioned housing segregation in Mountain Home and Nampa. In Mountain Home, one stakeholder mentioned that most of the Hispanic population is concentrated in mobile home parks. In Nampa, several mentioned that South Nampa had a higher concentration of Hispanic residents. They noted that the area was often more heavily policed and the schools were not as good as others in the area.

Hispanic residents across the state noted they, or other residents they know, often live with other family members who cannot afford to live on their own. Many times, their children cannot afford to rent a place of their own once they are done with school and are forced to continue living with their parents or other relatives. These families, as well as families with younger children, have difficulty finding rental stock with the appropriate number of bedrooms in their price range. In addition, some residents reported living in rental arrangements where the property owners are not providing basic services and appliances such as heating, cooling, and appliances such as a stove, and refrigerator. In the winter in particular, some residents find it challenging to afford electricity bills.

For monolingual Spanish speakers, language barriers significantly reduce the size of the housing market available to them. These families tend to only rent from small-scale property owners who speak Spanish. The majority of the time these arrangements are only verbal, there are no formal leases, and provide little to no protection for the tenants.

Other stakeholders noted that Native Reservations are often areas with opportunity disparities compared to the rest of the State, citing poor housing quality, food deserts, and few means to generate wealth. An employee at a regional housing authority also noted that Native Americans often face discrimination when looking for homes to rent outside of reservations. Another stakeholder who runs education workshops for Idahoans looking to purchase their first home noted that many from underrepresented groups are turning up at workshops (namely women and Hispanic populations), but that Native Americans are still often missing from the table. This brought about concerns on ownership equity in the state.

Stakeholders working with refugees pointed to several instances of housing discrimination across the state. Some explained that many issues between property owners and refugees came down to simple issues, such as not speaking a common language. But many found that property owners refuse to rent to refugee households based on family size, while others are more blatantly unwilling to rent based on national origin. One stakeholder mentioned that property owners often have biases about refugee households, claiming they are not clean and bring more crime to the community. The stakeholder mentioned this has been amplified as the

"Most recently there were a couple complexes and hotels that said they wouldn't accept refugees into their buildings." – *Regional stakeholder*

"We called a hotel and made a reservation for a [refugee] family for temporary housing. It was accepted, but once we showed up and they saw the family, they turned them away." – *Regional stakeholder* demographics of refugees have changed: "As we started to see more populations from the Middle East, many landlords said, 'we have to keep our other residents safe' and denied them housing." One stakeholder even noted an elected official exclaiming that refugees should not receive housing assistance because they are "not one of us" and "don't belong here." Some have tried to make renting to refugees more attractive to property owners with little success. One stakeholder's organization even offers to pay the entire lease term up front, but property owners still refuse to rent to refugees. Another offers to pay for small-scale apartment repairs so that property owners do not have to, and others provide in-home training to show refugees how to use and maintain appliances that may be foreign to them. Despite these efforts, those working to house refugees nearly all groups noted issues with discrimination.

Family type. In addition to multigenerational refugee and Hispanic households facing housing discrimination, many other family types faced housing discrimination as well. For example, one housing authority employee mentioned issues with property owners refusing to rent to single mothers, often in areas with active religious communities. One resident, a mother of four, indicated having faced discrimination in the area around Nampa multiple times. She indicated she has spent around $280 in application fees over the past year with no success. When property owners find out she has children, they ask her how many and inquire about the condition in which she left her previous rental.

Others mentioned discrimination based on sexuality. For instance, one stakeholder explained that many LGBTQ+ individuals have to pretend to be roommates to find housing, and cannot find housing when living openly as a couple. Among the LGBTQ+ community in Idaho, housing can be especially precarious because many do not have familial networks to fall back on. This means that many are doubling up in small spaces—one stakeholder mentioned an instance of 6 people living in a two-bedroom home because housing was otherwise too expensive.

Disability status. Very few stakeholders mentioned outright discrimination or segregation based on disability. Most noted that property owners were willing to make minor accommodations to their homes, but some faced larger accommodation issues. A handful of residents and stakeholders reported property owners not accepting service animals. Others explained that even though Medicaid can pay for some home modifications, navigating that process with property owners was inhibitory. Some stakeholders noted that high income requirements effectively limit leasing options for people with disabilities: "Requiring four times rent in income is weeding out people with limited incomes because of disabilities," one stakeholder noted. Others discussed recent closures of group homes leaving many people without housing.

"We have nothing for integrated living. Everyone who has moderate mental health issues is getting kicked out of community homes, becoming homeless, and then going to jail." – *Regional stakeholder*

In addition to issues finding affordable housing, many pointed to issues finding accessible housing. Many stakeholders said that the housing stock is too old, and others said more recent builders and developers did not wish to make homes that were visitable or accessible. One noted that those with mental health issues like PTSD are unable to live in especially dense types of housing, but these were the only affordable options on the market.

Other types of discrimination. Some stakeholders pointed to discrimination outside of protected classes. These included discrimination against those with housing vouchers and those with felony or drug charges. One housing authority employee noted that there is "always a stigma. If a landlord had an issue with a Section 8 tenant in the past, then it sticks in their memory and they don't take a voucher holder again."

> **"The tighter the market, the more the landlords discriminate. They often turn away voucher holders because they can rent more on the open market and don't have as much paperwork. The voucher holder population isn't finding a place to live."** – *Housing authority employee*

Some stakeholders hoped outreach programs would reduce misperceptions about voucher holders. Some also hoped requirements and trainings for those renting to voucher holders could be made simpler so they are less taxing on property owners. Others wished to see the decriminalization of drugs and homelessness so that individuals experiencing such issues would not have criminal records that impede them from finding housing.

Fair housing education and outreach. When asked if they know who to contact for housing resources or complaints around discrimination, residents were rarely aware of any organizations they could reach out for help or guidance.

Stakeholders expressed concern about existing organizations' conflicts between providing education and outreach and also being responsible for bringing fair housing lawsuits. Stakeholders expressed the sentiment that fair housing organizations have good intentions, but their repeated threats to bring lawsuits hamstrings the ability for partners—fair housing organizations, nonprofits, local governments, and housing providers—to work collectively to affect positive change.

"In Oregon I think they separate their enforcement and training so that there is a much better outreach for landlords."

SECTION VII.

REGULATORY REVIEW

SECTION VII.
Regulatory Review

This section reviews relevant state and local regulations for how they affect housing choice. This analysis was guided by HUD's Fair Housing Planning Guide,[1] best practices in zoning ordinances and land-use regulations, and application of legal decisions concerning land use and housing choice.

At the state level,* the Planning Guide identifies the following as factors that could affect the state's ability to comply with the Federal Fair Housing Act, as amended by the Federal Fair Housing Amendments Act of 1988 (41 U.S.C.A. § 3601 et. seq.)—collectively called the FHA—to address housing for protected classes in more detail:

- Building, occupancy, health and safety codes that may disproportionately affect the availability of housing for certain protected classes (covered by this section);
- State policies and actions affecting the approval of sites and/or the approval process for construction (covered by this section);
- Banking and insurance laws pertaining to the financing, refinancing, sale, purchase rehabilitation, or rental of housing (covered by this section);
- Statewide policies concerning multifamily rehabilitation, accessibility standards, displacement of households (e.g., due to tax increases), and demolition of housing (covered by this section);
- Policies that disproportionately restrict housing and community development resources and/or employment opportunities for certain protected classes;
- Policies and practices that restrict interdepartmental coordination (covered through stakeholder consultation which included coordination with fair housing organizations);
- Planning, financing, and administrative actions related to access to opportunity that may disproportionately affect certain protected classes (covered in Section IV); and

[1] https://www.hud.gov/sites/documents/FHPG.PDF

*Except where otherwise stated, references to 'state policies' are limited to the actions and authority of state government.

- Policies and practices that affect the representation of all protected classes on advisory boards, commissions, and committees.

In some cases, fair housing challenges may not be evident through a review of regulatory or code language. Consulting stakeholders with experience serving vulnerable populations, administering programs funded by the state, and encountering local barriers is therefore necessary. The findings from stakeholder consultation that supplement this regulatory review are discussed in Section V.

Following this Introduction, this section is organized into five sections:

- Findings and Recommendations
- State Regulations Review,
- Local Regulations Review,
- Board and Commissions Review, and
- Qualified Allocation Plan Review.

Findings and Recommendations

This section summarizes: 1) How the relevant regulations analyzed have the potential to create barriers to housing choice, and 2) Recommendations to improve those regulations.

State summary:

- Idaho statutes continue to be silent in the many areas that affect residential development. Regulations governing land use, zoning, housing type and placement (including group living facilities) are primarily adopted and applied at the local level. The effects of a passive approach are mixed: the state does not directly adversely affect residential development, but it does not encourage practices that can mitigate fair housing risks (e.g., defining disability and reasonable accommodation) or encourage residential housing supply (e.g., specifying that localities must allow for density bonuses in exchange for affordable housing when economically feasible).

- The state statutes that do address housing generally promote more varied and affordable housing and were adopted to prevent unfair and discriminatory practices in the local regulation of group homes, housing for persons with mental or physical disabilities, manufactured housing, or rental housing.

- State statutes are neutral on incentives for building 'zero-step' single family subdivisions. Given the demand for 'visitable' housing (approximately 6% of Idahoans live with a mobility limitation, but only 1% of residential units are wheelchair accessible), the lack of accessible housing choice leads to increased costs for accessibility modifications, independent living and Idaho's Medicaid budget.

- Idaho places restrictions on local jurisdiction authority to impose local taxes, which has been interpreted by Idaho courts as including programs that would require affordable housing ("inclusionary housing"). Idaho also prohibits rent control except on land or in properties in which a local government has an interest. These laws limit the powers of local jurisdictions to promote more affordable housing that could benefit those protected by the FHA. The direct effect of these limitations depends on how local ordinances would be structured and who would benefit from such programs if allowed by state law. The State of Colorado, which also has a rent control prohibition, recently amended its constitution to allow inclusionary zoning when jurisdictions offer an offset to the cost of developing affordable housing, including density bonuses. Density bonus programs are generally well-received by residential developers and are becoming a popular mechanism to make better use of land and facilitate affordable housing development.

Local barriers were examined through a review of a sample of local codes. The six "study communities" include the counties of , Franklin,, Kootenai, and Twin Falls and the cities of Sandpoint, Burley, and Mountain Home. Some of the community regulations could be brought into closer compliance with the requirements and intent of the FHA. The findings and recommendations for local communities are outlined in the figures that follow.

Figure VII-1.
Local Review Findings and Recommendations

KEY REGULATIONS REVIEWED	LOCAL ZONING AND LAND USE REVIEW	RECOMMENDATIONS
Definition of Disability	None of the six study communities defined key terms like "disability" or "handicap" to reflect the full scope of those terms as they are used in the FHA. Defining key terms from the FHA helps ensure compliance with the law and clarify the rights of groups protected by the FHA.	Define terms like "disability" and "handicap" to match the broad definitions of those terms as used in the FHA and interpreted by the courts (which includes those with a record of disabilities and those generally considered by the public to have a disability, and including those in recovery programs for substance abuse).
Group Home Regulations and Definitions of Disability	Most of the six study communities do not permit larger group living facilities on the same terms as townhouse or multifamily structures. Large group living facilities (typically allowing more than eight residents) should be permitted in the same districts, with the same permissions and procedures, as multifamily dwellings.	Allow group living facilities that occupy townhouse or multifamily structures to be established by the same procedures, and subject to the same standards, as townhouses or multifamily dwellings occupied by the general public, and preferably without a public hearing requirement.
Reasonable Accommodations	Only the City of Mountain Home provides explicit procedures for responding to requests for reasonable accommodations under the FHA. Reasonable accommodation procedures ensure people from protected groups are afforded an opportunity to access and enjoy their homes and are best when the process is made straightforward and apolitical.	Include a written procedure (in the zoning ordinance or in an administrative document) for responding to requests for reasonable accommodations under the FHA.
Minimum Lot Size	Only one of the six study communities includes a zoning district that allows a minimum lot size below 5,000 square feet without a special approval process.	Allow the creation of single family lots of relatively small size in at least some zone districts in order to promote more affordable housing, because a disproportionate number of lower income households include FHA-protected groups.

Source: Clarion Associates and Root Policy Research.

Figure VII-2.
Local Review Findings and Recommendations

KEY REGULATIONS REVIEWED	LOCAL ZONING AND LAND USE REVIEW	RECOMMENDATIONS
Accessory Dwelling Units (ADUs)	ADUs are permitted in five of the six study communities, although one of them places additional restrictions on who can occupy the structure (e.g., only people employed on the agricultural operation). Limitations on occupancy may deter development of these low-impact housing options.	Allow both attached and detached ADUs without restrictions on who can occupy the ADU.
Multifamily Development	Multifamily development is largely not permitted in the study counties. In the municipal study communities, multifamily development is constrained by low maximum building heights (35 feet) or conditional use requirements.	Allow multifamily residential development of various densities by right in appropriate zoning districts (at least one). Adopt maximum building heights that reflect the market realities of constructing multifamily housing. Height limits in the 50- to 75-foot range give multifamily builders more ability to achieve efficiencies of scale with lower cost construction methods and materials.
Parking	All of the six study communities require a minimum number of parking spaces, and four of them apply the two-spaces-per-dwelling-unit standard (rather than a lower requirement) for most residential uses—including group living facilities, whose residents typically have lower parking needs.	Reduce minimum parking regulations for housing in general, and particularly for group living facilities designed for occupancy by those groups protected by the FHA. Although many communities have traditionally required a minimum of two parking spaces per dwelling unit, a growing number of communities now require less than two in order to allow smaller lot sizes and more affordable housing. The City of Mountain Home does not require off-street parking to be provided for any use in the Downtown Overlay, which is one example of an approach to reduce barriers.

Source: Clarion Associates and Root Policy Research.

Regulatory Review Background

The ability of private real estate markets to meet affordable housing needs is strongly affected by zoning, subdivision, and land development regulations adopted by local governments. In many cases, local regulations that are intentionally or unintentionally exclusionary can offset the impact of affordable housing subsidies or increase the amount of subsidy necessary for the market to meet affordable housing needs.

Typical regulatory barriers to affordable housing are found in development processing and permitting, infrastructure financing mechanisms, building codes, and environmental and cultural resource protection tools. In the area of zoning and subdivision, four specific types of barriers are most common:

- Minimum house size, lot size, or yard size requirements;
- Prohibitions on accessory dwelling units;
- Restrictions on land zoned and available for multifamily and manufactured housing; and
- Excessive subdivision improvement standards.

Economic implications of zoning and land use regulations. A growing and recent body of research has attempted to quantify how zoning and land-use regulations affect housing costs. Such studies are important to ensure that policies attempting to address affordable housing shortages through supply are effective. In sum, these studies confirm that restrictive land-use regulations raise housing costs—by suppressing the volume and type of housing supply needed to respond to market conditions.

- A 2021 study by researchers at the Mortgage Bankers Association—"Trends in Regulation and Affordability in Select U.S. Metropolitan Areas and Communities"—and published in *Cityscape* reviews literature on measuring affordability and land-use restrictions, focusing on how these interact. The authors observe that "While intuitive, it is not easy to establish a causal relationship between regulation levels and affordability." Part of this challenge is that land use has changed little over time, even as household composition and housing needs have changed.
- A 2018 study (Albouy and Ehrlich, "Housing Productivity and the Social Cost of Land-Use Restrictions*," Journal of Urban Economics*) examined the cost of typical land-use restrictions relative to the quality of life benefits such restrictions may provide. The authors found that land restrictions raise housing costs by 15 percentage points on average, and that state-level restrictions can often be more costly than local restrictions.
- Another study (Lin and Wachter, "The Effect of Land Use Regulation on Housing Prices: Theory and Evidence from California", a working paper) looked at land-use restrictions

in Los Angeles and concluded that housing prices could decline by as much as 25% if land-use regulations were relaxed to the levels of the least regulated cities.

- A 2020 study (Molloy, Nathanson, and Paciorek, "Housing Supply and Affordability Evidence from Rents, Housing Consumption and Household Location, from a Federal Reserve finance and economics discussion series) examined data between 1980 and 2016 and found that supply restrictions have a sizable impact on house prices but a modest to negligible effect on rents and the types of housing that is produced.

A slightly older (2007) nationwide study prepared by the National Association of Home Builders (NAHB) for HUD documented **which types of subdivision regulations have the greatest impact** on housing costs. After establishing benchmark standards representing their estimates of the minimums necessary to protect public health and safety, the study compared the cost of building single family housing under those benchmark standards with actual costs of home construction. The study concluded that:

- 65% of the added costs were caused by minimum lot size requirements; and
- 9% of the added costs were caused by lot width requirements.

A third contributor was minimum house size requirements. Although only 8% of local governments impose those controls, they were responsible for 17% of the added costs in those cities and counties that use them. Using 2004 data, the study concluded that subdivision regulations exceeding baselines for public health and safety added an average of $11,910 (4.8%) to the price of a new home.

For all of these reasons, it is important that local governments review their zoning, subdivision and land development regulations to ensure that they do not create barriers to private production of affordable housing, and that they include appropriate tools that could spur private production of affordable housing to fill identified gaps in housing supply.

Protected classes included in the analysis. The FHA prohibits housing discrimination based on race, color, religion, sex, national origin, familial status (which includes pregnant women, but which has been interpreted not to prevent regulations favoring households with children), or disability (which includes the frail, persons with AIDS, physically and developmentally disabled, mentally ill, and those recovering from substance use disorders, but not those who are not "recovering"). In this regulatory review, we refer to those groups as the "FHA-protected" citizens—those that are protected under federal law (as discussed in the Enforcement section, Idaho state law does not offer protections for familial status).

It is important to recall that the FHA list of protected groups does not include the elderly. Being old, by itself, is not considered a physical or mental disability. Those facilities that provide significant assistance with life activities because of the disabilities of their residents are likely covered by the FHA, while those that are simply residences for the elderly may not be covered by the FHA.

Note that the list of FHA-protected citizens does not include low-income persons, and we did not specifically review impacts of state regulations on housing affordability. However, because there is a significant overlap between the FHA-protected classes (such as persons with disabilities) and lower-income populations, this review sometimes mentions potential impacts of decreased affordability on the supply of housing for FHA-protected citizens.

State Regulations Review

This review of state regulations affecting housing availability is divided into two parts: 1) Codes regulating building standards and health and safety; and 2) Other types of regulations that are related to residential housing.

Housing-supportive regulations. A variety of regulations can affect provision of housing and housing choice of protected classes. This section begins by highlighting positive regulations in the state's statutes and then describes areas where statutes may create mixed impacts on local governments' ability to implement fair housing goals. Positive aspects of Idaho Statutes related to the provision of fair and affordable housing include the following, which are also summarized in the figure that follows this section.

Building, health, and safety codes. The Idaho Division of Building Safety sets the regulations for building codes; installation of electrical, plumbing and HVAC work; manufactured housing standards; and logging safety. The division also oversees licensing of electrical, HVAC, manufactured housing, plumbing, and public works contractors.

Building construction codes ensure the health and safety of occupants. However, codes with extensive requirements may increase housing costs and reduce the supply of affordable housing. In addition, if they contain provisions that discourage or prohibit the types of reasonable modifications needed to meet the needs of certain protected classes, they may create barriers to fair housing choice for these groups.

In 2018, the State Legislature approved an amendment to Chapter 41 of the Idaho Building Code Act that sought to align the state and local government building codes with the International Building Code (IBC). The amendment requires "Local governments that issue building permits and perform building code enforcement activities [to]… adopt the… International Building Code, including all rules promulgated by the board to provide equivalency with the provisions of the Americans with Disabilities Act accessibility guidelines and the federal Fair Housing Act accessibility guidelines…" Effective January 1, 2021, the Division of Building Safety, through negotiated rulemaking, has made the 2018 IBC, with amendments, the applicable Code to which local governments must conform. The 2018 IBC addresses the design and construction standards for persons with disabilities (accessibility provisions), standards for group homes, and rehabilitation standards.

Housing planning. Idaho Statutes, Title 67. State Government and State Affairs. Chapter 65. Local Land Use and Planning confers zoning powers on cities and counties. Such bodies are required to prepare a Comprehensive Plan that addresses, among other land-use factors, an analysis of housing conditions and needs, including the need for "low-cost housing." The plans must also address the needs for community facilities (schools, recreation facilities, transportation). Plans are reviewed and adopted by local planning commissions.

Title 26. Banks and Banking, Chapter 31. Idaho Residential Mortgage Practices Act. Part 2. Regulates the activities of mortgage brokers and lenders to protect borrowers against unknown and unreasonable fees and other practices that could adversely affect mortgage loan terms. For example, the law prohibits fees or charges prior to residential mortgage loan closings (with some exceptions, such as application fees) and specifies that the fees must be "reasonable and customary."

Title 39. Health and Safety. Chapter 33. Idaho Residential Care or Assisted Living Act, 39-3304. This act is intended to foster development of and provide incentives for residential care or assisted living facilities that serve persons with mental illness and developmentally or physically disabled populations. The act fosters small facilities (eight beds or less for individuals with developmental or physical disabilities or dementia and 15 beds or less for individuals with mental illness) that will "provide residents with the opportunity for normalized and integrated living in typical homes in neighborhoods and communities."

Title 39. Health and Safety. Chapter 46. Idaho Developmental Disabilities Services and Facilities Act, 39-4603. This act ensures that persons with developmental disabilities have the same legal rights and responsibilities as other residents.

Title 41. Insurance, Chapter 14. Property Insurance Rates, 41-1405. The Rate Standards section of this regulation prohibits excessive, inadequate or discriminatory insurance rates.

Title 55. Property in General. Chapter 15. Condominium Property Act, 55-1523. Prevents cities or counties from refusing condominiums from being zoned or developed.

Title 55. Property in General. Chapter 20. Manufactured Home Residency Act. Several chapters protect the rights of manufactured home renters.

- 55-2005 requires that, prior to execution of an agreement, landlords provide renters with a copy of the community rules.
- 55-2006 requires a 90-day written notice of rent and utility increases and/or changes to community rules. Also prevents rent increases or rule changes more than once in a six-month period. Also requires that rent increases be uniform throughout the community.

- 55-2007 specifies the terms required in the rental agreement.
- 55-2009 prohibits a landlord from denying a resident the right to sell their manufactured home and from collecting a fee on the sale unless the landlord is acting as and is qualified to act as an agent of the seller.
- 55-2010 regulates the circumstances under which a lease can be terminated.
- 55-2015 prevents retaliatory conduct by landlords (e.g., in response to health and safety complaints).

Title 67. State Government and State Affairs. Chapter 65. Local Land Use Planning, Sections 67-6509A and 6531 prevents zoning from excluding manufactured homes on the basis that they are manufactured homes and requires that manufactured homes be permitted where single-family residential uses are also permitted (except in historic districts).

Title 63. Revenue and Taxation. Chapter 6. Exemptions from Taxation, Section 63-602GG. Exempts low-income housing owned by nonprofit organizations from property taxes. To qualify, properties must be solely owned by a nonprofit; have reasonable eviction rules as defined in the regulation, and all units must be dedicated to low-income housing in the following manner:

- 55% of the units must be rented to households with incomes at or below 60% of the median income for the county in which the housing is located;
- 20% of the units must be rented to households with incomes at or below 50% of the median income of the county in which the housing is located; and
- 25% of the units must be rented to households with incomes at or below 30% of the median income for the county in which the housing is located.

This represents a change from previous requirements that the homes be affordable to households with incomes between 30% and 60% of the area median income; the new regulations mandate that 25% of affordable units serve households with the lowest incomes and greatest needs (which the former regulation did not). The change requires that more of the benefit of Idaho's tax exemption flow indirectly to households on the lower end of the income scale, and to the degree that lower incomes are indeed correlated with the FHA-protected classes, should strengthen the State's provision of fair housing.

Title 67. State Government and State Affairs. Chapter 65. Local Land Use Planning, Section 67-6531-6532. This section defines "single family dwelling" as including any group residence in which 8 or fewer unrelated persons with disabilities or elderly persons reside and who are supervised at the group residence in connection with their disability or age-related infirmity. This provision effectively forbids local governments from placing any additional permitting requirements or restrictions on group residences if those same requirements or restrictions are not applied to single-family dwellings in the same zone district.

Figure VII-3.
Positive Aspects of Idaho Statutes

TITLE	IDAHO STATUTE	SIGNIFICANCE
Residential Mortgage Practices Act	*Title 26. Banks and Banking, Chapter 31. Idaho Residential Mortgage Practices Act. Part 2.*	Regulates the activities of mortgage brokers and lenders to protect borrowers against unknown and unreasonable fees and other practices that could adversely affect mortgage loan terms.
Residential Care or Assisted Living Act	*Title 39. Health and Safety. Chapter 33. Idaho Residential Care or Assisted Living Act, 39-3304.*	This act is intended to foster the development of and provide incentives for residential care or assisted living facilities that serve persons with mental illness and developmentally or physically disabled populations. The act fosters small facilities (eight beds or less for individuals with developmental or physical disabilities or dementia and 15 beds or less for individuals with mental illness) that will "provide residents with the opportunity for normalized and integrated living in typical homes in neighborhoods and communities."
Developmental Disabilities Services and Facilities Act	*Title 39. Health and Safety. Chapter 46. Idaho Developmental Disabilities Services and Facilities Act, 39-4603.*	This act ensures that persons with developmental disabilities have the same legal rights and responsibilities as other residents.
Property Insurance Rates	*Title 41. Insurance, Chapter 14. Property Insurance Rates, 41-1405.*	The Rate Standards section of this regulation prohibits excessive, inadequate or discriminatory insurance rates.
Condominium Property Act	*Title 55. Property in General. Chapter 15. Condominium Property Act, 55-1523.*	Prevents cities or counties from refusing condominiums from being zoned or developed.
Manufactured Home Residency Act	*Title 55. Property in General. Chapter 20. Manufactured Home Residency Act.*	Several chapters protect the rights of manufactured home renters.
Local Land Use Planning	*Title 67. State Government and State Affairs. Chapter 65. Local Land Use Planning, Sections 67-6509A and 6531*	Prevents zoning from excluding manufactured homes on the basis that they are manufactured homes and requires that manufactured homes be permitted where single family residential uses are also permitted (except in historic districts).
Exemptions from Taxation	*Title 63. Revenue and Taxation. Chapter 6. Exemptions from Taxation, Section 63-602GG.*	Exempts low income housing owned by nonprofit organizations from property taxes. To qualify, properties must be solely owned by a nonprofit; have reasonable eviction rules as defined in the regulation; and all units must be dedicated to low-income housing.
Local Land Use Planning	*Title 67. State Government and State Affairs. Chapter 65. Local Land Use Planning, Section 67-6531-6532.*	This section defines "single family dwelling" as including any group residence in which eight or fewer unrelated persons with disabilities or elderly persons reside and who are supervised at the group residence in connection with their disability or age-related infirmity. This provision effectively forbids local governments from placing any additional permitting requirements or restrictions on group residences if those same requirements or restrictions are not applied to single family dwellings in the same zone district.

Source: Clarion Associates and Root Policy Research.

Housing-challenging regulations. On the other hand, Chapter 3, Section 55-307 of Title 55 (Property in General) contains Idaho's statewide prohibition on mandatory rent controls, which restricts local governments' ability to preserve existing housing and promote the creation of new housing at affordability levels that would provide a particular benefit to the FHA-protected citizens that are disproportionately represented in lower-income populations. It's important to note that the state rent control provisions do not apply to residential property in which a local government has a property interest; thus rent restrictions would be allowed in a case where a local government leases land to a housing provider who restricts rent increases.

In general, inclusionary zoning programs require that residential developments above a stated size threshold include a percentage of units at specific affordable rents or sales prices. Some high-cost urban areas (e.g., Austin—focused on affordable housing, Atlanta—focused on transportation corridors, Los Angeles—generating 30% AMI units, Seattle—large scale upzone) have implemented voluntary or mandatory inclusionary zoning programs in exchange for development benefits including density bonuses, and such programs are generally well received by residential developers.

However, Idaho resort communities that have attempted to enact inclusionary zoning programs have been challenged in court and those programs have been invalidated. The Idaho courts have generally determined that such programs exceeded local jurisdictions' authority to impose local taxes.

Many other types of regulations than can affect housing availability or conditions are not regulated at the state level. These include occupancy codes and restrictions (beyond the IBC), certain types of group homes (e.g., homes for recovering alcoholics and/or substance abusers), and displacement of low-income residents (other than what is included in the manufactured home regulations discussed above).

Local Regulations Review

The 2011 State of Idaho fair housing study included a comprehensive review of state regulations and 43 county-level regulations affecting residential development and occupancy (Benewah County was exempted because it had not adopted zoning controls). Following this review, IHFA sponsored education and outreach events throughout Idaho to help cities and counties better understand the role that land-use and zoning decisions have in furthering housing choice.

This 2021 study does not repeat that extensive local analysis. Instead, it reviews zoning and land development regulations in six geographically and economically diverse Idaho localities to illustrate the wide range of regulatory approaches to key issues that impact housing affordability and availability. The six "study communities" include the counties of Twin Falls, Franklin, and Kootenai and the cities of Sandpoint, Burley, and Mountain Home.

Key areas of local housing regulation. The most significant areas of local regulation affecting the availability of housing as required by the FHA include regulations related to:

- Treatment of group living designations;
- Reasonable accommodations;
- Minimum residential lot size;
- Manufactured housing;
- Accessory dwelling units;
- Multifamily housing, and
- Parking.

Group living. The failure to align local definitions related to group living, handicap, and disability with definitions of those terms in the FHA and related court decisions is one common barrier to fair housing in many local communities.

The FHA makes it unlawful:

> *"To discriminate in the sale or rental, or to otherwise make unavailable, or deny, a dwelling to any buyer or renter because of a handicap of (a) that buyer or renter, or (b) a person residing in or intending to reside in that dwelling after it is so sold, rented, or made available, or (c) any person associated with that buyer or renter."*

A person with a "handicap" (i.e., "disability") is (1) a person with a physical or mental impairment that substantially limits one or more major life activities; (2) a person who has a record of such impairment; or (3) a person who is regarded as having that type of impairment. As noted above, the definition covers the frail, persons with HIV, those experiencing physical, sensory, cognitive or mental disabilities, and recovering alcoholics and drug addicts participating in a treatment program. The definition does not cover persons currently using or addicted to alcohol or a controlled substance and not "recovering," and does not cover facilities or halfway houses for those in the criminal justice system.

If a local government does not allow for residential uses for the groups listed above, on substantially the same terms that it allows housing for individuals that do not fall into any of those categories, it may be deemed to have made those types of residences "unavailable." In order to avoid this result, local zoning should allow group housing for those meeting the broad federal definition of handicap or disability in those residential zone districts where they allow housing of the same size or scale as for those not listed in the Act. Although it is good practice to allow small group homes "by right" (i.e., without the need for a discretional hearing or decision), some zoning codes that allow those uses by conditional use permit have been upheld.

Generally, the local regulation of group homes falls into three categories, each of which is described below, beginning with those most clearly compliant with the FHA, and ending with the category that may be most subject to a legal challenge.

- The first category (and a best practice) is to permit uses like "group homes," "institutional housing," "congregate care," "assisted living," "halfway houses," "rehabilitation centers," or other uses that are traditionally used to provide housing for persons in one or more of the categories listed in the FHA by right, provided the project meets the same zoning regulations applicable to housing for the general public.
- A second category includes communities that allow housing for the elderly on the same terms they permit housing of the same size and scale for the general population, but either ignore housing for other categories of individuals identified in the FHA or only allow housing for those group after a conditional use approval. Localities in this category should review their zoning controls to ensure that they allow housing for all of those protected by the Act, and particularly for those individuals experiencing mental or physical disabilities. In addition, these communities should remove conditional use approval requirements.
- A third category includes counties and municipalities that do not mention housing facilities for those types of individuals protected by the FHA at all. While several Idaho communities have zoning controls that include overlay districts, conditional use permit procedures, or Planned Unit Development tools that could be used to provide housing for groups protected by the FHA on a case-by-case basis. However, use of these discretionary zoning tools almost always requires a public hearing, which draws attention to the characteristics of the proposed residents (i.e. those with physical or mental disabilities), which is contrary to both the spirit of the FHA and court decisions holding that the Act prohibits the imposition of extra conditions or steps in the approval procedures for housing of FHA protected individuals.

Study community findings. The six study communities' provisions related to group housing are summarized below.

Franklin County

- Group home, group living, handicap/disability are undefined.
- Group housing facilities are not mentioned or regulated, with the exception that nursing homes are mentioned for purposes of flood plain regulations.

Kootenai County:

- Group Home is defined: "A single-family dwelling in which eight (8) or fewer unrelated elderly persons or persons with disabilities reside and who receive on site supervision in connection with their disability or age-related infirmity. Resident staff, if employed, need not be related to each other or to any of the other persons residing in the group home. No more than two (2) of such staff members shall reside in the dwelling at any given time."

    - A Group Home is considered a “Single-Family Dwelling” and is “permitted of right” in the Agricultural, Rural, Agricultural Suburban, Restricted Residential, High-Density Residential, and Commercial districts.
    - Transitional Group Housing Facility is permitted with a conditional use permit in the High Density Residential, Commercial, Mining, and Light Industrial districts.
- Residential Care Facility is defined: “A facility in which nine (9) or more unrelated elderly persons or persons with disabilities reside, generally on a long-term basis, and receive on-site supervision in connection with their disability or age related infirmity. The facility may also provide short-term rehabilitation services for such persons. Resident staff, if employed, need not be related to each other or to any of the other persons residing in the facility.”
    - A Residential Care Facility is permitted with a conditional use permit in the Agricultural, Rural, Agricultural Suburban, Restricted Residential, and High Density Residential districts.
- Transitional Group Housing Facility is defined: “A facility for the transitional housing or sheltering of nine (9) or more disabled, indigent, or abused persons. Resident staff, if employed, need not be related to each other or to any of the other persons residing in the facility. For purposes of this definition:
    - "Disabled" shall have the same meaning as the term "qualified individual with a disability", as set forth in the Americans With Disabilities Act of 1990 and associated regulations, and shall also include those persons determined to be disabled by the Social Security Administration or the Department of Veterans Affairs, or pursuant to the workers' compensation laws of any state.
    - "Indigent" shall mean any person who does not have sufficient income or assets to provide for his or her basic needs, including food, clothing, shelter, and transportation, and, if applicable, the basic needs of his or her family.
    - "Abused" shall mean any person who is the victim of domestic battery, injury to a child, or any crime of a sexual nature, as defined in title 18, Idaho Code, similar Federal law, or similar law of any other state, whether or not the alleged perpetrator was charged with such crime.”

Twin Falls County:

- Group home, group living, handicap/disability are undefined, however Home Nursing is defined as “A building housing any facility, however named, whether operated for profit or not, the purpose of which is to provide skilled nursing care and related medical services for more than eight (8) individuals experiencing illness, disease, injury, disability or requiring care because of old age. Also known as a "rest home".”

- Group housing facilities are not mentioned or regulated, with the exception that nursing homes.

City of Burley:

- Handicap/disability are undefined.
- Group Residence is defined: "A single residential building in which eight (8) or fewer unrelated persons with disabilities or elderly persons reside and who are supervised at the group residence in connection with their disability or age related infirmity. Resident staff, if employed, need not be related to each other or to any of the persons with disabilities or elderly persons residing in the group residence. No more than two (2) of such staff shall reside in the group residence at any one time."
- A Group Residence is permitted in the General Multiple Residence, Mixed Multiple Residence and Hobby Livestock, Neighborhood Commercial, Commercial Highway, and Enclosed Manufacturing Permit districts. "Long-term care units" are also permitted in the Special District.
- Homes for persons with disabilities (which are undefined) are permitted in the Limited Multiple Residence and Neighborhood Services District and General Multiple Residence District.

City of Mountain Home:

- Handicap/disability are undefined.
- A Group Care Facility is defined: "A facility or dwelling unit housing persons unrelated by blood or marriage and operating as a group family household. May include recovery home, home for elderly, battered women and children, etc."
    - ➢ A Group Care Facility is permitted in the C-3, C-4, and I-1 districts and permitted conditionally in the LO/R, C-1, and C-2 districts.
- A Group Home is defined: "As per Idaho Code, a profit or nonprofit place of residence for the sheltering of eight (8) or fewer people with disabilities or elderly persons to live in normal residential surroundings as single-family dwellings as provided for by Idaho Code."
    - ➢ A Group Home is permitted in the LO/R, C-1, C-2, C-3, C-4, and I-1 districts and permitted conditionally in the R-1, R-2, R-3, and R-4 districts.
- A Handicapped residence (which is undefined but which may be considered a Group Home for the Aged, Mentally and Physically Handicapped Resident Homes, which includes performance standards) is permitted in the R-1, R-2, R-3, R-4, LO/R, C-1, and C-2 districts and permitted conditionally in the C-3 and C-4 districts.

City of Sandpoint:

- Group home, group living, handicap/disability are undefined.
- Hospital, Sanatorium, Hospice is defined: "An institution open to the public, in which sick patients or injured persons are given medical or surgical care; or for the care of contagious diseases or terminally ill patients."
- Nursing Home or Rest Home is defined: "A private hospital for the care of children, the aged or infirm or a place of rest for those suffering bodily disorders, but not including facilities for the treatment of sickness or injuries or for surgical care."
    - Residential Care Homes and Facilities (which is undefined) is permitted in the Commercial A, B, and C districts.

Reasonable accommodation. In addition, §42 U.S.C. 3604(f)(3)(B) of the FHA provides that it is a violation of law for a government to not make "reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling." Because lawsuits to enforce the provisions of the FHA related to physical and mental disability are common—and since a large number of fair housing legal cases in Idaho (reviewed in Section VI) involve reasonable accommodations—local governments can reduce their liability if they consider and develop policies to respond to applications for group homes, either by pointing to a zone district or permit system by which they can be approved, or to a 'reasonable accommodation' process.

While the Act does not require that a formal process for making reasonable accommodations appear in the zoning ordinance or other adopted regulations, it does require that local governments make accommodations that are reasonable. To promote transparency and public understanding that their local government is required to make those accommodations, the best practice is to have a process for administrative approval of those accommodations required by the FHA.

Study community findings. The six study communities' provisions related to reasonable accommodations are summarized below

- **Franklin County.** Reasonable accommodations are not mentioned or regulated.
- **Kootenai County.** Reasonable accommodations are not mentioned or regulated, however §8.4.1404 8.4.1404 notes that "no building or other structure shall hereafter be erected or altered in any manner contrary to the provisions of this title or title 7, chapter 1 of this code, including, without limitation, the following" … "Accommodating or housing a greater number of families; provided, however, that this provision shall not be interpreted in a manner that discriminates against race, ethnicity, national origin, age, family status or disability…"
- **Twin Falls County.** Reasonable accommodations are not mentioned or regulated.
- **City of Burley.** Reasonable accommodations are not mentioned or regulated.

- **City of Mountain Home.** Reasonable accommodations are detailed in §9-6-11.
- **City of Sandpoint.** Reasonable accommodations are not mentioned or regulated.

Minimum residential lot size. It is common in Idaho (and throughout the U.S.) for rural localities to require very large minimum sizes for residential lots, which can raise housing costs and disproportionately impact FHA-protected citizens. While large minimum lot sizes may be appropriate in some areas to preserve rural/agriculture character and open vistas, there are often areas of the community where much smaller lots could be approved available without compromising those values. Areas near existing towns or non-agriculture areas can often be zoned for more affordable lots with little or no impact on the perceived character of the county. In fact, traditional land-use patterns in much of the west often included small settlements and old townsites sprinkled among much larger tracts of range and farmland. In many cases, allowing small lots (and thereby diverse and more affordable housing types) can provide added benefits of housing workforce, retaining families, and community revitalization.

Large lot sizes also tend to increase auto-dependence and make it more difficult for persons with disabilities by limiting their ability to drive to occupy those housing units. Because land costs can often constitute one-third of the costs of new housing, allowing smaller lot sizes can significantly enhance the volume of housing available to serve FHA-protected classes.

Study community findings. The six study communities' regulations related to minimum single-family residential lot sizes are summarized below:

- **Franklin County.** The smallest minimum lot size for single-family development is 1 acre. The minimum manufactured home space size in a manufactured home park is 900 square feet.
- **Kootenai County**. The smallest minimum lot size for single-family development is 6,000 square feet in the High Density Residential District.
- **Twin Falls County.** The smallest minimum lot size for single-family development is 9,000 square feet in the Rural Residential District (if approved as conditional use).
- **City of Burley.** The smallest minimum lot size for single-family development is 4,500 square feet in the General Multi Residence District and Mixed Multiple Residence and Hobby Livestock District.
- **City of Mountain Home.** The smallest minimum lot size for single-family development is 5,000 square feet in the R-4 District.
- **City of Sandpoint.** The smallest minimum lot size for single-family development is 5,000 square feet in the R-S District.

Manufactured housing. Manufactured housing and mobile homes remain one of the more affordable forms of available housing. In rural areas, where housing supply is limited, manufactured housing can be an affordable and efficient way for lower-income households to live in single-family properties. In some areas, manufactured and mobile homes are the only type of rental property available to larger families.

Generally, zoning ordinances address manufactured housing and mobile homes in one of two ways, or a combination of those two ways. The first approach is to define single-family homes to include HUD-compliant manufactured homes that meet applicable development standards, or otherwise allow them in some or all zones where single family homes are allowed. The second approach is to restrict manufactured homes to manufactured home parks or districts, but to not allow them in other residential zones. The prevailing practice in Idaho is to accept manufactured homes on individual residential lots in at least some zone districts. Those counties that do not allow them on individual lots should consider doing so.

Study community findings. The study community approaches to regulating manufactured housing are described below.

- **Franklin County.** Manufactured homes are permitted in all districts, subject to standards and after obtaining a building permit.
- **Kootenai County.** Manufactured home parks are permitted by conditional use permit in the High Density Residential District. A Class A manufactured home is considered a single-family dwelling and "permitted of right" in all agricultural, residential, and commercial districts. Class B manufactured homes are "permitted of right" in the Agricultural, Rural, and High-Density Residential districts, but require a special use permit in the Agricultural Suburban and Restricted Residential districts.
- **Twin Falls County.** Manufactured homes are permitted as single-family dwellings in the Agricultural Range Preservation District, Agricultural District, Rural Residential District, and Outdoor Recreation Overlay District, subject to standards. Mobile Home Parks require BOCC approval of a plat map.
- **City of Burley.** Manufactured homes are considered single family dwellings and are permitted in three residential (Restricted Single-Family Residence, Limited Multiple Residence, and General Multiple Residence) districts and one commercial (Neighborhood Commercial) district, subject to standards.
- **City of Mountain Home.** Manufactured homes are permitted (on their own lot) in all residential districts (R-1, R-2, R-3, R-4, and LO/R) and two commercial districts (C-1 and C-2), subject to standards. Manufactured home parks are permitted in the R-1, R-2, R-3, and R-4 districts and permitted with a conditional use permit in the C-3 and C-4 districts. Manufactured home subdivisions are permitted in the R-1, R-2, R-3, and R-4 districts and permitted with a conditional use permit in the LO/R, C-3, and C-4 district

- **City of Sandpoint.** Manufactured homes are permitted in the RS and RM districts, subject to standards.

Accessory Dwelling Units (ADUs). Accessory dwelling units (a second, smaller residential lot on a parcel that already contains a primary dwelling unit) have been identified as an important tool in promoting housing affordability. Their limited size helps reduce building or conversion costs, and because they are located on already existing lots, there are no additional land costs. Because they allow persons with disabilities to live very near others who may be able to assist in their care or life activities, they also contribute to meeting the goals of the FHA.

Although many local zoning ordinances in Idaho do not address ADUs, many do address secondary dwelling units such as "guest houses," "farm and ranch" operations, or dwelling units that are limited to occupancy by family members. Although limits on who may occupy an ADU are very difficult to enforce, such rules could significantly limit the ability of ADUs to expand housing opportunities for FHA-protected individuals. While facially neutral with respect to FHA protections, they could have the effect of allowing occupancy of an ADU by an able-bodied person who is not a member of an FHA-protected class while prohibiting occupancy by a person experiencing a disability.

Study community findings. Five of the six study communities allow ADUs in some form, and their regulations are summarized below.

Franklin County. ADUs (or similar) are not mentioned or regulated.

Kootenai County. An Accessory Living Unit is permitted in the Agricultural, Rural, Agricultural Suburban (on lots at least 8,250 square feet), Restricted Residential (on lots at least 8,250 square feet), and High Density Residential districts, in all agriculture and residential districts with standards.

Twin Falls County.

- Farm labor dwelling units are allowed (with proof of full-time employment with the agricultural use of land) in the Agricultural Range Preservation District.
- Private summer cottages and accessory buildings, along with hunting and fishing cabins, are permitted in the Outdoor Recreation Overlay District.
- Other types of ADUs are allowed as temporary uses after a "hardship" finding (i.e., when it is necessary to have someone living in close proximity for providing care for an elderly person(s), a person(s) with mental or physical disability, or a person(s) with a medical condition that requires assisted living).

City of Burley. ADUs are permitted in all residential and two commercial districts.

City of Mountain Home. ADUs are permitted in all districts.

City of Sandpoint. ADUs are permitted in all residential districts with standards. Accessory dwellings are permitted in the RS, RM, RR-2 districts and the Commercial A, B, and C, districts with standards. A residential caretaker unit is permitted in the IG, IBP, and ITP districts.

These regulations show a strong acceptance of secondary dwelling units in various areas of Idaho. Localities that impose family use or non-rental requirements, or that limit these units to farm and ranch operations, should consider removing those restrictions in order to increase the value of secondary units as a form of affordable housing.

Multifamily development. As Americans continue to move to the western states and localities are challenged to approve new developments to accommodate growth, the need for attached and multifamily housing is rising. Demand for these types of housing are also growing by both Millennials and Baby Boomers, some of whom favor lower maintenance properties in walkable areas over single family detached homes. Many FHA-protected groups of citizens also have lower incomes than the population at large and may only be able to afford multifamily living.

Unfortunately, many rural Idaho counties, smaller towns, and cities have few if any zoning districts that accommodate attached or multifamily housing. In other cases, the zoning controls include such districts, but little or no land has been mapped into the district. In yet other communities, multifamily and attached housing is only available through a negotiated "Planned Unit Development" (PUD) process, which often adds time, expense, and uncertainty to the development process—all of which tend to drive up housing prices. That said, jurisdictions could use PUD negotiations to encourage developers to include housing type diversity and set aside land for affordable housing (e.g., provided by a nonprofit).

As Idaho's rural counties and smaller municipalities consider accommodating greater densities in housing to promote affordable housing construction, it is important to tailor those changes to densities that achieve construction efficiencies and reduce housing costs. Construction efficiency can be realized through building form flexibility—such as allowing duplexes/triplexes in place of single family—or by repurposing underutilized land to densities above 12 dwelling units per acre (a series of duplexes/twin homes, or row of townhomes). While residents may fear the zoning of large areas for these types of development, they can be limited in scale (no more than X dwelling units or Y contiguous acres of land) and located where they have the least impact on traditional community character. As with almost everything related to housing, proactive planning to accommodate projected needs is preferred and sends clearer signals to private developers about the types of housing that the locality is prepared to approve.

Closely related to the availability of multifamily housing is the permitted maximum height or density of that housing. Very low maximum building heights tend to limit the supply of those types of housing needed by many households protected by the FHA. At present, few Idaho counties regulate building height, but this appears to be primarily because they do not have zoning districts that allow multifamily development. However, each of the three Idaho cities analyzed as a part of this report do regulate maximum building height.

The "standard" maximum height permitted in most single-family residential zone districts is 35 feet, which generally allows a two-story building with a pitched roof or a three-story building with a flat roof. Zoning ordinances that limit heights in multifamily districts to 35 feet may make it difficult for builders to achieve the higher densities necessary to make multifamily construction more affordable. Some common building codes allow structures to achieve heights of up to 75 feet before requiring more expensive and fire-resistant building construction techniques. Height limits in the 50- to 75-foot range give multifamily builders more ability to achieve efficiencies of scale with lower cost construction methods and materials. Importantly, however, the maximum height should be low enough that the local fire department or district can provide effective fire protection with available equipment. Many western community building codes draw that line at 75 feet.

The six study communities' regulations permitting or restricting multifamily housing, and the permitted height and intensity of that housing, are summarized below.

Franklin County.

- Multifamily housing is permitted in any district if the lot is at least 7,260 square feet with a Class II Permit (similar to a special use or conditional use permit).
- All buildings are limited to 35 feet in height.

Kootenai County.

- Multiple family dwellings "permitted of right" in the High-Density Residential District (when above the first floor of a permitted primary use or in a separate accessory building; maximum density is 1 unit per 3,000 square feet), permitted by special use permit in the Agricultural Suburban, and permitted by special use permit in the Commercial District (where the minimum parcel size is 12,000 square feet; the parcel must have frontage on a public road; and the maximum density is 1 unit per 3,000 square feet).
- There is no maximum height in any agricultural, residential, or commercial districts.

Twin Falls County.

- Two-family and three-family dwellings are permitted with a conditional use permit in the Rural Residential. No other multi-family dwellings are expressly permitted, except that dwellings may be converted to a multi-family use "within a zone in which a new building or similar occupancy would be permitted under this title."
- Building height is not regulated, except in the Airport Overlay.

City of Burley.

- Duplexes are permitted in all residential and two commercial districts. Four-unit dwellings are permitted in all residential districts (except R-1) and two commercial districts. Five-to-eight-unit dwellings are permitted by special use permit in all residential districts (except R-1) and two commercial districts. Townhouses are permitted by special use permit in the R-2 and R2-A districts and by right in the R-3, R-4, and two commercial districts.
- Building height is limited to 30 feet in the R-1 District, 40 feet in the R-2 and R2-A districts. There is no maximum building height in any other district.

City of Mountain Home.

- Duplexes and attached single-family dwellings are permitted in the R-3, R-4, LO/R, C-1, C-2, C-3, and C-4 districts. Townhomes and three-to-four-unit dwellings are permitted in the R-4, LO/R, C-1, C-2, C-3, and C-4 districts and permitted with a conditional use permit in the R-3 District. Dwelling with more than 4 units are permitted with a conditional use permit in the R-4, LO/R, C-1, C-2, C-3, and C-4 districts.
- Building height is limited to 30 feet in the R-1, R-2, R-3, R-4, and LO/R districts, 35 feet in the C-1 District, 45 feet in the C-3 and C-4 districts, and 55 feet in the C-2 District.

City of Sandpoint.

- Multifamily dwellings with seven units or less are permitted in the RM while multifamily dwellings with eight or more units are permitted with a conditional use permit in the RM. Multifamily dwellings are permitted in the Commercial C District and are permitted on upper stories above ground floor nonresidential use, on ground floors behind storefront space, or integrated into a mixed use structure where design is consistent with the storefront character in the Commercial A and B districts. Duplexes are permitted on upper stories above ground floor nonresidential use, on ground floors behind storefront space, or integrated into a mixed use structure where design is consistent with the storefront character in all commercial districts while Townhomes are permitted in all commercial districts without restriction.
- Building height is limited to 40 feet in the RM District, and 35 feet in the Commercial A, B, and C districts but allows up to 65 feet when structure parking or a residential component is included in the building footprint (but 50 feet when adjacent to a residential zone).

Parking. Minimum parking requirements for residential uses affect housing affordability by requiring more land per dwelling unit. While the norm for many years has been to require two off-street parking spaces per dwelling unit (or even more for units with three or more bedrooms), a growing number of communities are lowering that standard for certain types of housing where experience has shown that occupants may own fewer cars—e.g., a category that includes the elderly and persons experiencing mental or physical disabilities.

In the case of multifamily housing, the two-spaces-per-dwelling-unit requirement can significantly reduce the number of dwelling units that a given parcel of land can accommodate. Since the lowest cost parking spaces are those at grade (i.e., not in garages either above or below ground), minimum parking requirements tend to shrink the footprint available for the apartments or condominiums, and that (along with low height limits) often restricts the final density of development below the maximum density that is in theory available under the zoning code.

Because lower-income households may own fewer cars, and because many special needs residents do not own cars, many local governments adopt lower parking standards for affordable or group housing developments. These standards vary greatly depending on the types of group living to which they apply. Of the six study communities, only Sandpoint offers a minimum parking reduction (20%) for deed-restricted affordable housing.

Study community findings. The study community approaches to residential minimum parking requirements are described below.

- **Franklin County.** Two spaces required per manufactured home. Parking is determined for most uses by the County on a case-by-case basis.
- **Kootenai County.** One space required for single family dwellings. Two spaces for duplexes, manufactured homes, and for each dwelling unit in multifamily dwellings. One additional space for ADUs.
- **Twin Falls County.** Two spaces required per dwelling unit.
- **City of Burley.** Two spaces required per dwelling unit.
- **City of Mountain Home.** Two spaces required per dwelling unit in the R-1, R-2, and R-3 districts, which includes a requirement that two spaces be covered in the R-1 and R-2 districts and one space be covered in the R-3 district. Two spaces are required for manufactured homes. No parking is required for any use in the Downtown Overlay.
- **City of Sandpoint.** One to two spaces are required per dwelling unit (based on number of bedrooms), except that 1.4 spaces are required per dwelling unit for duplexes, townhomes, and multi-family dwellings. Two spaces are required for group homes.

Summary of local zoning review findings. The following figure summarizes and scores the local zoning review. It assigns a rating to the most significant areas of local regulation affecting the availability of housing as required by the FHA as discussed above.

- Poor. Regulations leave the community open to fair housing challenges and/or do not help promote housing choice. They should be updated to be in better alignment with best practices.
- Moderate. Regulations may leave room for fair housing challenges and could be updated to be in better alignment with best practices.
- Strong. Regulations are in alignment with best practices.

Figure VII-4. Local Zoning and Land Use Review

KEY REGULATIONS REVIEWED	FRANKLIN COUNTY	KOOTENAI COUNTY	TWIN FALLS COUNTY
Group Home Regulations and Definitions of Disability	Poor. Group home, group living, handicap/disability are undefined. Group housing facilities are not mentioned or regulated, with the exception that nursing homes are mentioned for purposes of flood plain regulations.	Strong. Group homes are defined, are considered a single family dwelling, and are permitted by right. Disabled is defined in alignment with the Americans with Disabilities Act of 1990 and expands to include those classified as disabled by the Social Security Administration, VA, or pursuant to state law.	Poor. Group home, group living, handicap/disability are undefined. Group housing facilities are not mentioned or regulated, with the exception of nursing homes.
Reasonable Accommodation	Poor. Reasonable accommodations are not mentioned or regulated.	Poor. Reasonable accommodations are not mentioned or regulated.	Poor. Reasonable accommodations are not mentioned or regulated.
Minimum Lot Size	Poor. The smallest minimum lot size for single family development is 1 acre.	Moderate. The smallest minimum lot size for single family development is 6,000 square feet in the High Density Residential District.	Moderate. The smallest minimum lot size for single family development is 9,000 square feet in the Rural Residential District (if approved as conditional use).
Manufactured Housing	Strong. Manufactured homes are permitted in all districts, subject to standards and after obtaining a building permit.	Moderate. Manufactured home parks are permitted by conditional use permit in the High Density Residential District. The "Class" of manufactured home determines which residential zones permit them by right. Class A manufactured homes are considered a single-family dwelling and "permitted of right" in all agricultural, residential, and commercial districts.	Moderate. Manufactured homes are permitted as single-family dwellings in the Agricultural Range Preservation District, Agricultural District, Rural Residential District, and Outdoor Recreation Overlay District, subject to standards. Mobile Home Parks require BOCC approval of a plat map.

Source: Clarion Associates and Root Policy Research.

Figure VII-5. Local Zoning and Land Use Review

KEY REGULATIONS REVIEWED	CITY OF BURLEY	CITY OF MOUNTAIN HOME	CITY OF SANDPOINT
Group Home Regulations and Definitions of Disability	Poor. Handicap/disability are undefined. Group residence is defined and permitted in several multiple residential unit zoning districts. Group residences are not permitted in single family districts.	Moderate. Handicap/disability are undefined. Group Care Facilities are permitted by right in high intensity commercial zones only, conditionally in other commercial districts. Group Homes (8 or fewer residents) are permitted by right in most commercial zones, conditionally in residential areas. Handicapped residences are permitted in residential zones by right and high intensity commercial zones conditionally.	Poor. Group home, group living, handicap/disability are undefined. Residential Care Homes (undefined) are permitted in commercial districts.
Reasonable Accommodation	Poor. Reasonable accommodations are not mentioned or regulated.	Strong. Reasonable accommodations are detailed in the municipal code.	Poor. Reasonable accommodations are not mentioned or regulated.
Minimum Lot Size	Strong. The smallest minimum lot size for single family development is 4,500 square feet in the General Multi Residence District and Mixed Multiple Residence and Hobby Livestock District.	Strong. The smallest minimum lot size for single family development is 5,000 square feet in the R-4 District.	Strong. The smallest minimum lot size for single family development is 5,000 square feet in the R-S District.
Manufactured Housing	Strong. Manufactured homes are considered single family dwellings and are permitted in three residential (Restricted Single-Family Residence, Limited Multiple Residence, and General Multiple Residence) districts and one commercial (Neighborhood Commercial) district, subject to standards.	Strong. Manufactured homes are permitted (on their own lot) in all residential districts (R-1, R-2, R-3, R-4, and LO/R) and two commercial districts (C-1 and C-2), subject to standards. Manufactured home parks and subdivisions are permitted in a number of residential districts and conditionally in commercial districts.	Moderate. Manufactured homes are permitted in the RS and RM districts, subject to standards.

Source: Clarion Associates and Root Policy Research.

Figure VII-6. Local Zoning and Land Use Review

KEY REGULATIONS REVIEWED	FRANKLIN COUNTY	KOOTENAI COUNTY	TWIN FALLS COUNTY
Accessory Dwelling Units (ADUs)	Poor. ADUs (or similar) are not mentioned or regulated.	Moderate. An Accessory Living Unit is permitted in the Agricultural, Rural, Agricultural Suburban (on lots at least 8,250 square feet), Restricted Residential (on lots at least 8,250 square feet), and High Density Residential districts, in all agriculture and residential districts with standards.	Poor. Farm labor dwellings and private summer cottages with accessory buildings (e.g., hunting cabins) are permitted in the Agricultural Range Preservation District. Other ADUs are permitted temporarily after a "hardship finding" (i.e., a family member needs assisted living)
Multifamily Development	Moderate. Multifamily housing is permitted in any district if the lot is at least 7,260 square feet with a Class II Permit (similar to a special use or conditional use permit). All buildings are limited to 35 feet in height.	Moderate. Multiple family dwellings “permitted of right” in the High Density Residential District with onerous conditions, permitted by special use permit in the Agricultural Suburban, and permitted by special use permit in the Commercial District with onerous conditions. There is no maximum height in any agricultural, residential, or commercial districts.	Poor. Two-family and three-family dwellings are permitted with a conditional use permit in the Rural Residential. No other multi-family dwellings are expressly permitted. Building height is not regulated, except in the Airport Overlay.
Parking	Poor. Two spaces required per manufactured home. Parking is determined for most uses by the County on a case-by-case basis.	Poor. One space required for single family dwellings. Two spaces for duplexes, manufactured homes, and for each dwelling unit in multifamily dwellings. One additional space for ADUs.	Moderate. Two spaces required per dwelling unit.

Source: Clarion Associates and Root Policy Research.

Figure VII-7. Local Zoning and Land Use Review

KEY REGULATIONS REVIEWED	CITY OF BURLEY	CITY OF MOUNTAIN HOME	CITY OF SANDPOINT
Accessory Dwelling Units (ADUs)	Strong. ADUs are permitted in all residential and two commercial districts.	Strong. ADUs are permitted in all districts.	Strong. Accessory dwellings are permitted in the RS, RM, RR-2 districts and the Commercial A, B, and C, districts with standards. A residential caretaker unit is permitted in the IG, IBP, and ITP districts.
Multifamily Development	Strong. Duplexes are permitted in all residential and two commercial districts. Four-unit and five-to-eight unit dwellings are permitted in all residential districts (except R-1) and two commercial districts. Townhouses are permitted by special use permit in the R-2 and R2-A districts and by right in the R-3, R-4, and two commercial districts. Building height is limited to 30 feet in the R-1 District, 40 feet in the R-2 and R2-A districts. There is no maximum building height in any other district.	Moderate. Duplexes and attached single-family dwellings are permitted in the R-3, R-4, LO/R, C-1, C-2, C-3, and C-4 districts. Townhomes and three-to-four-unit dwellings are permitted in the R-4, LO/R, C-1, C-2, C-3, and C-4 districts. Dwellings with more than 4 units are only permitted with a conditional use permit. Building height is limited to 30 feet in the R-1, R-2, R-3, R-4, and LO/R districts, 35 feet in the C-1 District, 45 feet in the C-3 and C-4 districts, and 55 feet in the C-2 District.	Strong. Multi-family dwellings with seven units or less are permitted in the RM while multi-family dwellings with eight or more units are permitted with a conditional use permit in the RM. Multi-family dwellings are permitted in the Commercial C District with onerous conditions. Duplexes are permitted in mixed use areas while Townhomes are permitted in all commercial districts without restriction. Building height is limited to 40 feet in the RM District, and 35 feet in the Commercial A, B, and C districts but allows up to 65 feet with structured parking.
Parking	Moderate. Two spaces required per dwelling unit.	Moderate. Two spaces required per dwelling unit in the R-1, R-2, and R-3 districts. Two spaces are required for manufactured homes. No parking is required for any use in the Downtown Overlay.	Moderate. One to two spaces are required per dwelling unit (based on number of bedrooms), except that 1.4 spaces are required per dwelling unit for duplexes, townhomes, and multi-family dwellings. Two spaces per unit are required for group homes.

Source: Clarion Associates and Root Policy Research.

Boards and Commissions Review

Idaho has a very traditional approach for Board and Commission appointments, which could discourage applicants representing Idaho's diversity in demographics, geography, and interests. A 2016 review of the representation of women on state boards and commissions by the Idaho Boards Project found that female representation is 30%--far less than the overall proportion of females in Idaho.

Idahoans interested in board and commission service would likely start by using the Internet to find positions of interest. A basic search leads to the Office of the Governor. An application can be accessed here which uses a "fillable PDF" format.

The application could be improved to encourage a more diverse set of applicants by:

- Providing instructions for a reasonable accommodation, which could encourage persons with disabilities to apply;
- Allowing applicants to self-identify gender;
- Specifying for which boards and commissions a Political Party is required. Because the application is housed on the Governor's website and the application suggests an applicant needs to provide their political party, Idahoans who do not share the same political affiliation as state leaders may be discouraged from applying. If the intent is to achieve a balanced representation, that could be achieved in the application process;
- Asking for volunteer service (e.g., religious, nonprofit) in addition to employment, which could encourage stay-at-home parents, persons without traditional work histories, and persons who cannot work to apply;
- Providing an option for Limited English Proficient Idahoans; and
- Providing information on the minimum requirements for applicants up front. The application requires a background check, which may discourage persons with criminal histories from applying. Such individuals could be an important addition to boards and commissions that advise on criminal justice reform.

Qualified Allocation Plan Review

The LIHTC program is one of the largest rental housing programs in the U.S., having provided financing for the creation of more than 2.5 million rental units nationwide. The program supports the development of affordable rental housing by allowing private sector investors (usually partners of the developers and/or owners of the housing) to reduce their federal taxes through tax credits related to the level of affordability of the project. The developments receiving tax credits are chosen by state housing financing agencies, including IHFA in Idaho. The award of credits is determined by the Qualified Allocation Plan (QAP). IHFA uses two allocation rounds to award credits.

Idaho's QAP was last updated on March 26, 2021. This section contains the primary findings from the review of that QAP as related to fair housing.

Fair housing. All tax credit developments receiving awards must be located in a jurisdiction that has adopted an "Affirmatively Furthering Fair Housing Resolution" and implemented a fair housing action plan. A Fair Housing Assessment Plan required by Idaho Commerce or a recent Analysis of Impediments to Fair Housing Choice will count toward the fair housing action plan.

Set-asides. The QAP allows for the following set asides:

1) 15% of the annual per capita tax credit for housing that accommodates special needs;

2) 15% for new construction of developments located in communities that qualify for rural development multifamily programs; and

3) 10% for the rehabilitation of existing federally assisted rent-restricted developments.

The QAP also allows an eligible basis increase of up to 30% for special housing needs and developments that have unusually high construction and/or land costs (e.g., located in a high cost resort community or high cost urban center).

Points and scoring. Section 6 of the QAP discusses the selection criteria and point system by which applications are evaluated. Points prioritize:

- Developments located near goods and services (including social services, health care, educational facilities and job training sites and major employment centers);
- Design and construction elements including Internet and computer access and units with hard surfacing, which is more friendly to people using wheelchairs;
- Rent-restricted units with waitlist preferences to households with disabilities;
- Developments located in a Census tract with a poverty rate that is equal to or greater than the State's overall poverty rate;
- Permanent supportive housing units; and
- Developments with deeper levels of affordability (40% AMI and less).

Community support. Community support is not a requirement for allocation. This helps to de-politicize the LIHTC award process and deflect NIMBYism.

Project awards. Applications for tax credits and awards from 2020 were reviewed for diversity in beneficiaries and geographic location. Awards were granted for many family, as well as senior, projects. The counties with the most project awards include Canyon and

Latah, followed by Blaine. Latah County was identified in Section II of this report as having a high proportion of renters, of persons experiencing homelessness, and receiving high-cost mortgage loans. Canyon County was a focus of stakeholder concerns about displacement related to rising housing costs. And Blaine has some of the highest rent and home prices in the state.

Stakeholder perspectives. Several stakeholders offered opened-ended comments when asked about the QAP in the stakeholder survey, most of which concerned the need to strike a balance between location of LIHTC developments in low and high resourced areas:

- The LIHTC and Fair Housing law are in conflict with each other. This isn't an IHFA issue, but a regulatory issue that promotes the investment in low-income areas with new projects that are required to be in qualified census tracts.
- Ensure the QAP process and scoring strike a balance between Idaho's low-cost and high-cost areas.
- To promote housing choice, [the state should prioritize] tax credits in affluent areas of a community to provide even better housing choice and access to schools.
- Ensure the QAP for LIHTC projects does not disadvantage resort or high-cost markets.
- Work with communities to prioritize the development of housing with better access to food, education, transportation, health care. *"I know that the QAP evaluates this, but, the basic need resources in newer areas of a town aren't the same as those that have been long established within the central core a community."*
- The state should examine the feasibility of using LIHTC within Native communities.
- Scoring preferences seem to be set up to favor larger development partnerships (v. smaller entities).

SECTION VIII.

FAIR HOUSING ENVIRONMENT

SECTION VIII.
Fair Housing Environment

This section examines the fair housing environment in the State of Idaho. The contents of the section include:

- A review of state fair housing laws and enforcement;
- An analysis of fair housing complaints, as well as charges or letters of findings from HUD and legal cases, to assess trends in fair housing violations; and
- An overview of fair housing resources.

Federal and State Fair Housing Laws and Enforcement

The Federal Fair Housing Fact (FHA), passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, sex, familial status, and disability.[1] The FHA covers most types of housing transactions including rental housing, home sales, mortgage and home improvement lending, as well as policies and practices that determine the placement of residential housing (e.g., land use and zoning regulations).

Excluded from the FHA are owner-occupied buildings with no more than four units, single family housing units sold or renter without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons.[2]

State and local laws. States or local governments may enact fair housing laws that extend protection to other groups—or are more limited in nature. For example, the City of Boise's non-discrimination ordinance prohibits discrimination in housing transactions based on sexual orientation and/or gender identity/expression.

States with laws that have the same or exceed the protections in the federal FHA are deemed "substantially equivalent." Thirty-seven states in the U.S. have substantially equivalent fair housing laws, which enables HUD to refer complaints of housing discrimination to state agencies for investigation. HUD reimburses state agencies for this

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[1] For the purposes of this report, the acronym FHA refers to both the Fair Housing Act of 1968 and the amendments from 1988.

[2] "How Much Do We Know? Public Awareness of the Nation's Fair Housing Laws", The U.S. Department of Housing and Urban Development, Office of Policy and Research, April 2002.

work. An advantage of state-level investigation is that residents have a local resource for fair housing investigation; many state agencies maintain regional offices.

The State of Idaho is not a substantially equivalent state. The state's fair housing law differs from the FHA in that it does not recognize familial status. State law also covers providers with two or more properties, whereas federal law covers more than four.

Neighboring states all exceed FHA in their protections:

- Utah has broader protections than the FHA. In addition to the coverage provided under the FHA, the Utah Fair Housing Act prohibits discrimination based on source of income, sexual orientation, and gender identity.
- Nevada offers additional protections of ancestry, sexual orientation, and gender identity/expression.
- Montana offers additional protections based on marital status, creed, and age.
- Washington offers protections for sexual orientation or gender identity, honorably discharged veteran or military status, marital status, HIV/AIDS or Hepatitis C status, and a need for guide or service animals.
- Oregon extends protections for marital status, sexual orientation (including gender identity), honorably discharged veterans/military status, domestic violence victims, and source of income. Source of income was originally intended to protect benefit income, such as social security income or disability income. The ordinance was modified in July 2014 to extend protections to Section 8 vouchers and other forms of rental subsidies.

Fair housing inquiry and complaint process. Idaho residents who feel that they might have experienced a violation of the FHA can contact one or more of the following organizations:

- HUD's Office of Fair Housing and Opportunity (FHEO)—to file a complaint based on federal FHA protections;
- Intermountain Fair Housing Council (IFHC)—to inquire about fair housing rights and receive assistance with filing complaints;
- The Idaho Housing and Finance Association (IHFA)—for questions about fair housing protections and education about fair housing;
- Idaho Legal Aid Services—to receive help with evictions, foreclosures, and fair housing discrimination, and
- Idaho Commission on Human Rights (IHRC)—to file a complaint based on state fair housing protections.

Role of IHFA. IHFA does not enforce fair housing law and would refer complaints to the appropriate service provider. Tenants or those wishing to pursue a complaint would be referred to local/statewide enforcement entities and/or to HUD's toll-free Fair Housing line, while providers would be referred to either a HUD/FHEO specialist or to the housing hotline to determine an appropriate referral.

In 2011, IHFA established a 2-1-1 line*, Idaho Careline Quick Referral* that residents can call to get information about fair housing questions and concerns, and numbers to call to file a complaint. IHFA also has a toll-free housing hotline (855-505-4700, ext. 8602) to answer additional housing-related questions, as well as housing assistance guides that include information on fair housing laws. These guides are available in English, Spanish, French, Arabic, Swahili, and Burmese.

IHFA also maintains a website dedicated to fair housing, https://www.idahohousing.com/fair-housing/, as well as the Idaho Fair Housing Forum at http://fairhousingforum.org/, which provides fair housing information, events/trainings, and other resources.

Complaints filed with HUD. Housing discrimination complaints may be filed online at HUD Form903 Complaint. Residents may also call HUD toll free at 1-800-669-9777 (FHEO in Washington D.C.), 1-800-877-8339 (TDD line for hearing impaired), or 1-800-877-0246 (Seattle Fair Housing Regional Office, which serves Idaho residents).

According to HUD, when a complaint is received, HUD will notify the person who filed the complaint along with the alleged violator and allow that person to submit a response. The complaint will then be investigated to determine whether there has been a violation of the FHA.

A complaint may be resolved in a number of ways. First, HUD is required to try to reach an agreement between the two parties involved. A conciliation agreement must protect the filer of the complaint and public interest. If an agreement is signed, HUD will take no further action unless the agreement has been breached.

If during the investigative, review, and legal process HUD finds that discrimination has occurred, the case will be heard in an administrative hearing within 120 days, unless either party prefers the case to be heard in federal district court.

Complaints filed with the State of Idaho. The Idaho Commission on Human Rights (IHRC) enforces the State of Idaho's employment and housing anti-discrimination laws. Complaints can be filed online (English - HRC Questionnaire (idaho.gov)), by phone, and through regular mail or email. IHRC can only enforce state fair housing law, as the state's law is not substantially equivalent to the federal FHA.

IHRC provides mediation services to resolve complaints for little or no cost.

If mediation is not selected, IHRC investigates the complaint and issues a finding of "no cause" if the available evidence does not suggest that illegal discrimination occurred or there was "probable cause." In that case, IHRC seeks a resolution to compensate the victim and ensure that others will not receive similar treatment. If a resolution is reached, this becomes a "conciliation agreement" and the dispute is closed.

When a resolution is not agreed upon, IHRC may file an action in district court on behalf of the victim or the victim may withdraw the lawsuit. This must occur within one year of the filing of the complaint.

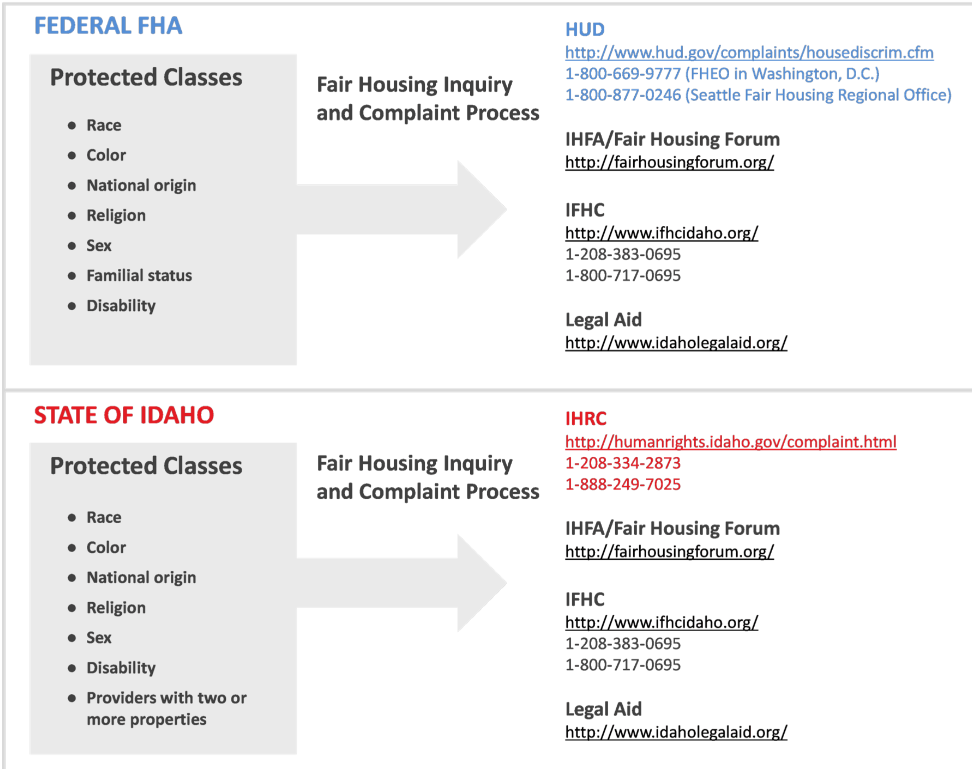
Individuals may also file a private action in court; they must do so 90 days from the IHRC's dismissal of a complaint.

Complaints filed with local organizations. The nonprofit Intermountain Fair Housing Council (IFHC) provides fair housing education and outreach statewide. The organization also provides enforcement of the federal FHA and monitors compliance of fair housing providers, lending institutions and units of government in Idaho. IFHC has the authority to negotiate fair housing settlements by mediation, conciliation, and litigation. IFHC can be contacted by calling 1-208-383-0695 or 1-800-717-0695 or online at http://www.ifhcidaho.org/.

Idaho Legal Aid is a nonprofit legal firm assisting low income Idahoans with a variety of legal matters. Housing services include assistance with evictions, homeowners rights, foreclosures, mobile home contracts, property taxes, tenant rights, and fair housing. The types of cases accepted are based on local capacity and program priorities, which are based on funding. More information is available online at http://www.idaholegalaid.org/.

Figure VIII-1 summarizes fair housing protections and enforcement of fair housing laws.

Figure VIII-1.
Fair Housing Protections and Fair Housing Inquiry and Complaint Process, Federal FHA and State of Idaho



Source: BBC Research and Consulting

Fair Housing Complaint Trends

Between January 2016 and December 2020, 156 fair housing complaints[3] were filed by Idaho residents, a dramatic decrease in filings compared to the first half of the decade. A total of 317 fair housing complaints were filed by Idaho residents during the five year period between January 2011 and December 2015. Complaints during the 2016 and 2020 period were down by 50%.

Ada County accounted for nearly a quarter of all fair housing complaints, followed by Lincoln, Boise, Canyon, Kootenai, and Madison Counties (Figure VIII-2). These counties account for nearly 80 percent of all fair housing complaints.

[3] While 156 fair housing complaints were filed between January 2016 and December 2020, multiple complaints included more than one reason (e.g. base) for their complaint. As a result, in several of the figures below, the number of responses is 188.

Figure VIII-2. Number and Percentage of Fair Housing Complaints by County, State of Idaho, January 2016 to December 2020

Note:

No complaints were filed for Bear Lake, Benewah, Blaine, Bonner, Boundary, Butte, Camas, Caribou, Clark, Clearwater, Custer, Elmore, Franklin, Jefferson, Jerome, Lewis, Nez Perce, Oneida, Owyhee, Power, Teton, Valley or Washington counties.

Source:

U.S. Department of HUD Complaint Responsive Records, 2016 – 2020.

County	Number of Complaints	Percentage of Complaints
Ada	37	24%
Lincoln	30	19%
Boise	17	11%
Canyon	12	8%
Kootenai	12	8%
Madison	12	8%
Twin Falls	8	5%
Bannock	5	3%
Payette	5	3%
Bonneville	3	2%
Bingham	2	1%
Gem	2	1%
Idaho	2	1%
Minidoka	2	1%
Adams	1	1%
Cassia	1	1%
Fremont	1	1%
Gooding	1	1%
Latah	1	1%
Lemhi	1	1%
Shoshone	1	1%
State of Idaho	156	100%

Basis of complaints. Figure VIII-3 shows the percent of complaints by basis.[4] Nearly 60% of all fair housing complaints were based on disability. This is slightly higher than the national average (55%).[5] National origin and race represented the next greatest proportions (15% and 9%, respectively). While familial status represented the second greatest share of fair housing complaints between 2011 and 2015 in Idaho (18%), it only made up 7% of all complaints between 2016 and 2020.

[4] Complaints may have more than one basis.

[5] National Fair Housing Alliance, 2021 Fair Housing Trends Report

Figure VIII-3. Basis of Filed HUD Complaints by Year, January 2016 to December 2020

Note:

HUD uses "sex" to refer to gender discrimination. N= 188.

Source:

U.S. Department of HUD Complaint Responsive Records, 2016 – 2020.

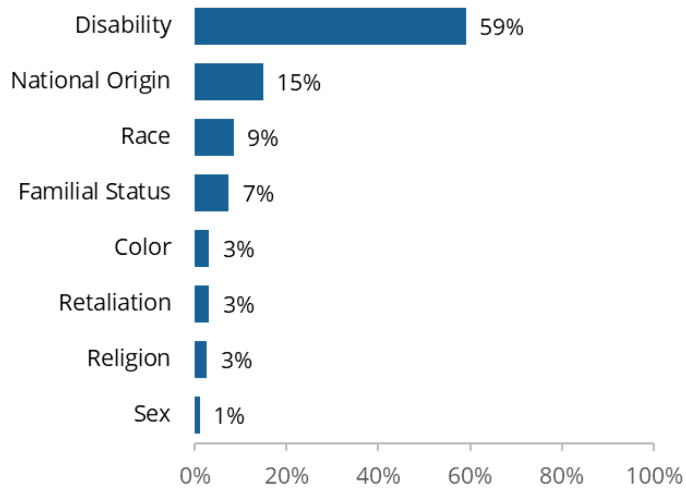
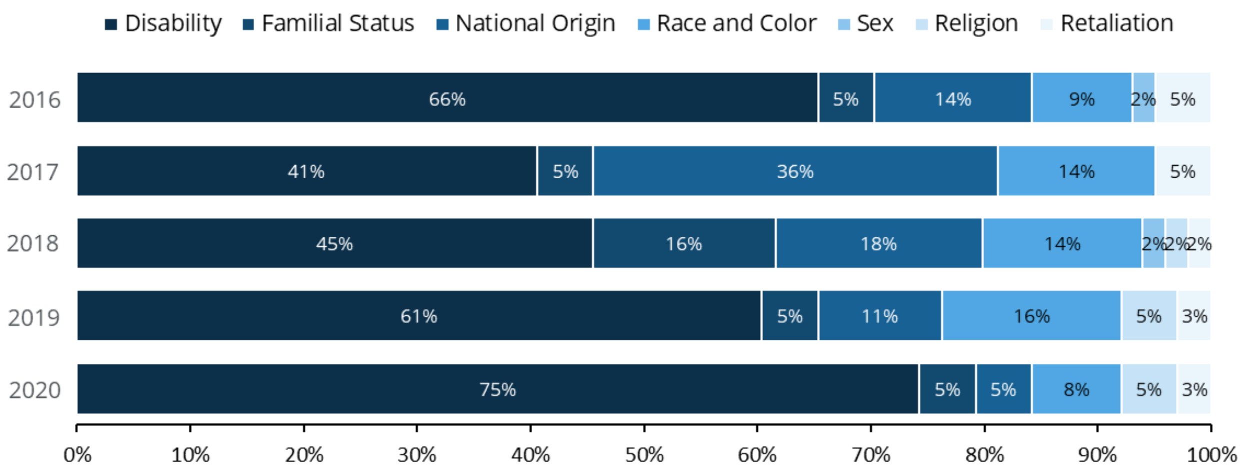


Figure VIII-4a shows the basis of complaints by year. Complaints based on disability accounted for over 60% of all complaints in three out of the five years, with complaints based on disability accounting for three quarters of all complaints in 2020. The next greatest proportion of complaints, those based on national origin, peaked in 2017 at 36% of total complaints. Since then, the overall proportion of complaints based on national origin has declined over the past few years, settling at 5% in 2020.

Figure VIII-4a.
Basis of Filed HUD Complaints by Year, State of Idaho, January 2016 to December 2020

	2016	2017	2018	2019	2020	All Years
Disability	66%	41%	45%	61%	75%	59%
Familial Status	5%	5%	16%	5%	5%	7%
National Origin	14%	36%	18%	11%	5%	15%
Race and Color	9%	14%	14%	16%	8%	12%
Sex	2%	0%	2%	0%	0%	1%
Religion	0%	0%	2%	5%	5%	3%
Retaliation	5%	5%	2%	3%	3%	3%



Note: HUD uses "sex" to refer to gender discrimination.

Source: U.S. Department of HUD Complaint Responsive Records, 2016 – 2020.

Figure VIII-4b presents the number of complaints by type by year.

Figure VIII-4b.
Number and Basis of Filed HUD Complaints by Year, State of Idaho, January 2016 to December 2020

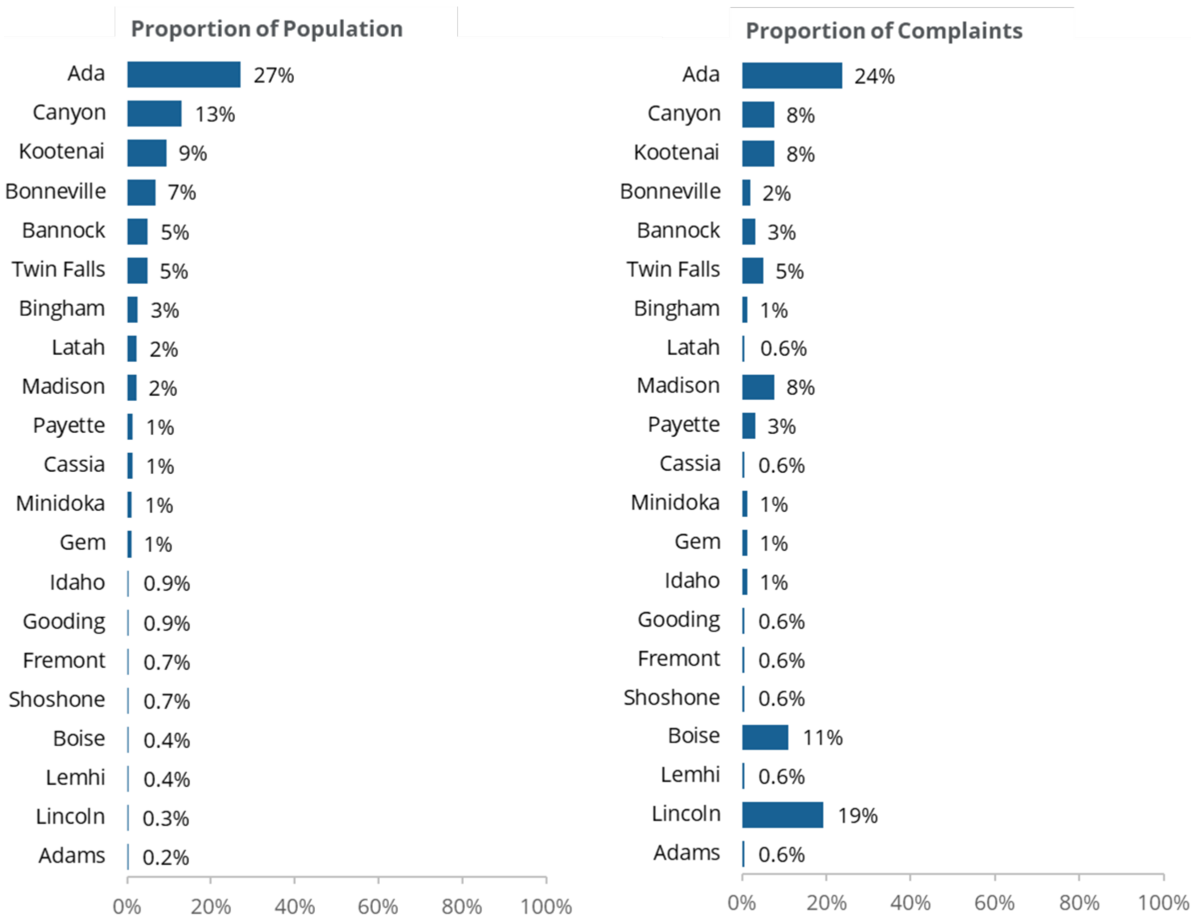
	2016	2017	2018	2019	2020	All Years
Disability	29	9	20	23	30	111
Familial Status	2	1	7	2	2	14
National Origin	6	8	8	4	2	28
Race and Color	4	3	6	6	3	22
Sex	1	0	1	0	0	2
Religion	0	0	1	2	2	5
Retaliation	2	1	1	1	1	6

Note: n=188.

Source: U.S. Department of HUD Complaint Responsive Records, 2016 – 2020

Geographic distribution. Figure VIII-5 compares the proportion of population and complaints by county. Lincoln and Boise counties are vastly overrepresented in the proportion of fair housing complaints relative to their share of the state population. Lincoln County accounts for 19% of all complaints while only accounting for 0.3% of the population, while Boise County has 11% of all complaints and only 0.4% of the state's population. Madison County is also overrepresented when comparing the proportion of complaints to population, although not as significantly as the aforementioned counties (2% of the population, 8% of complaints). Ada, Canyon and Kootenai counties, which represent the three most populous counties in Idaho, are all underrepresented when compared to their share of complaints.

Figure VIII-5.
Proportion of Population and Complaints by County, State of Idaho, January 2016 to December 2020



Note: No complaints were filed for Bear Lake, Benewah, Blaine, Bonner, Boundary, Butte, Camas, Caribou, Clark, Clearwater, Custer, Elmore, Franklin, Jefferson, Jerome, Lewis, Nez Perce, Oneida, Owyhee, Power, Teton, Valley or Washington counties.

Source: U.S. Department of HUD Complaint Responsive Records, 2016 – 2020; 2015-2019 ACS 5-Year Estimates.

Geographic variance in complaints by type. Complaints on the basis of disability account for the majority of complaints for most counties in Idaho. Of the 21 counties with a fair housing complaint between 2016 and 2020, 18 counties (86%) counted 50% or more of their fair housing complaints on the basis of disability.

Figure VIII-6 shows the 10 counties with the greatest share of complaints overall, as well as the proportion of those that are disability based. Madison, Canyon, Kootenai, Lincoln, Bannock and Payette all had a greater proportion of disability-based complaints than the state of Idaho overall. Aside from Kootenai County, the rest of the counties are located in the southern part of Idaho.

Figure VIII-6. Disability Based Complaint Proportion, Top 10 Complaint Counties, State of Idaho, January 2016 to December 2020

Note:

Total Complaints include the numbers of multiple complaints per case.

Source:

U.S. Department of HUD Complaint Responsive Records, 2016 – 2020.

County	Disability Based Complaints	Total Complaints	Percent
Ada	27	50	54%
Lincoln	21	32	66%
Boise	8	29	28%
Canyon	11	13	85%
Kootenai	9	13	69%
Madison	12	12	100%
Twin Falls	2	10	20%
Bannock	3	5	60%
Payette	3	5	60%
Bonneville	2	4	50%
State of Idaho	111	188	59%

Figure VIII-7 shows the same analysis as above for familial status. Bonneville, Bannock, Boise, Lincoln, and Canyon counties had a greater proportion of complaints based on familial status than the state overall.

Figure VIII-7. Familial Status Complaint Proportion, Top 10 Complaint Counties, State of Idaho, January 2016 to December 2020

Note:

Total Complaints include the numbers of multiple complaints per case.

Source:

U.S. Department of HUD Complaint Responsive Records, 2016 – 2020.

County	Familial Status Based Complaints	Total Complaints	Percent
Ada	3	50	6%
Lincoln	3	32	9%
Boise	5	29	17%
Canyon	1	13	8%
Kootenai	0	13	0%
Madison	0	12	0%
Twin Falls	0	10	0%
Bannock	1	5	20%
Payette	0	5	0%
Bonneville	1	4	25%
State of Idaho	14	188	7%

Resolution of complaints. Figure VIII-8 shows the resolution of closed complaints between 2016 and 2020. Of the 156 complaints during this time period, 87% have been closed and 13% remain open.

Pertaining to closed complaints, 28% were closed due to no cause determination, which occurs when HUD investigators determine a lack of substantial evidence of a fair housing violation. Thirty eight percent were successfully conciliated and closed, which occurs when the complainant and defendant agree on how to address the cause of the complaint. The remaining 21% of complaints were closed for a variety of reasons.

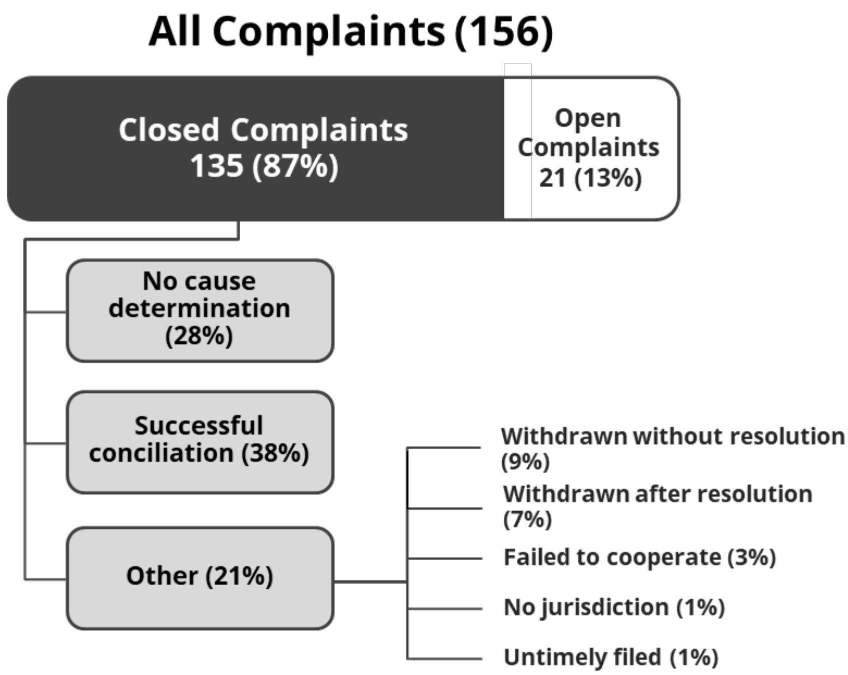
Figure VIII-8. Resolution of Closed Complaints, State of Idaho, January 2016 to December 2020

Note:

Successful conciliation is a combination of: negotiated conciliation before determination of cause, successful conciliation agreement after cause finding, conciliation prior to cause finding, and successful mediation during or after investigation.

Source:

US Department of HUD Complaint Responsive Records, 2016 – 2020.



Hate crimes. The incidence of hate crimes and the prevalence of hate crime groups can be an indicator of discrimination concerns even though they do not directly link to housing discrimination. Designating a crime to be a hate crime is the responsibility of local agencies. If a local agency determines that a crime is based on race, religion, sexual orientation, ethnicity, national origin, or disability, the crime is included in the data. Note that the crimes included in the data represent only the crime, not convictions.

Hate crimes in Idaho. The Southern Poverty Law Center is a nonprofit organization dedicated to civil rights, fighting hate and seeking justice for the most vulnerable. As part of this mission, the law center monitors hate crime incidents and hate-based organizations. The county and characterization of hate crime groups by the Southern Poverty Law Center was compiled using hate group publications and websites, citizen and law enforcement reports, field sources, and news reports. Nationally, the SPLC tracked 838 hate groups across the U.S. in 2020; seven hate groups were located in Idaho. There were 10 hate groups located in Idaho in 2014.

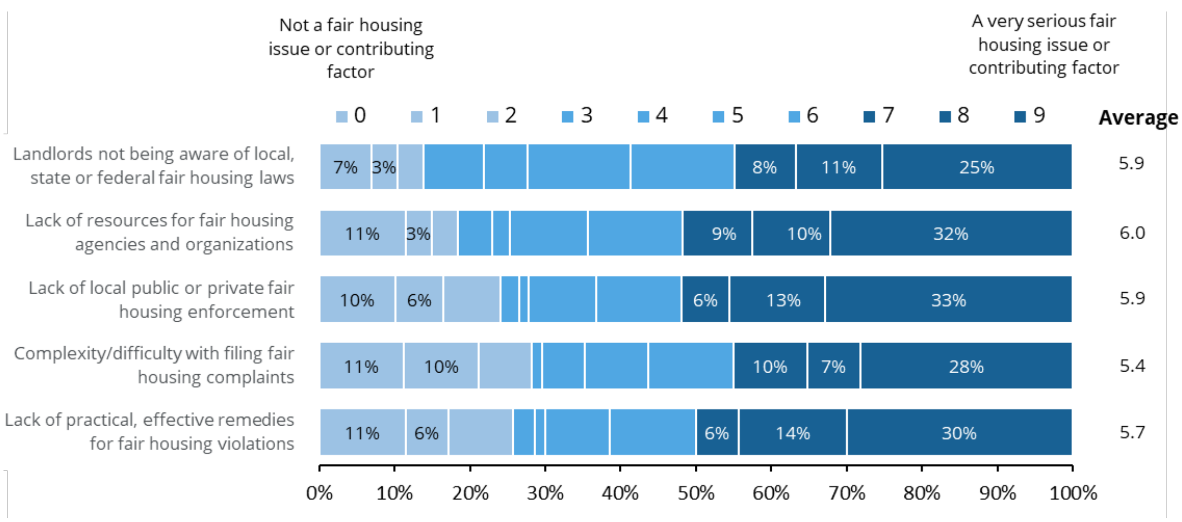
Fair housing environment – stakeholder perspectives. The survey conducted for this Analysis of Impediments to Fair Housing report asked stakeholders about their perspective on the fair housing environment in Idaho.

As shown in Figure VIII-9, the majority of stakeholders perceive lack of awareness, resources, education, and enforcement to be serious or very serious fair housing issues or contributing factors in the state of Idaho. Forty four percent of stakeholders felt landlords lack of awareness of local, state or federal fair housing laws was a serious or very serious fair housing issue, while 13% did not perceive it to be a fair housing issue or contributing factor. This is a major departure from stakeholder perspectives in 2016, where four out of every five stakeholders (80%) did not perceive lack of landlord awareness to be a serious fair housing issue.

A majority of stakeholders felt the lack of resources for fair housing agencies and organizations (51%) and lack of local public or private fair housing enforcement (53%) were serious or very serious fair housing issues. The complexity associated with filing fair housing complaints (45%) and the lack of practical and effective fair housing violation remedies (50%) were also seen as serious or very serious fair housing issues.

These collective results represent a significant reversal from the stakeholder perspectives shared in 2016, where most respondents did not view the lack of capacity, education or knowledge to be serious fair housing issues.

Figure VIII-9.
Stakeholder Perspectives: Fair Housing Laws and Enforcement



Note: n ranges from 58 to 100.

Source: Root Policy Research, 2021 Idaho Stakeholder Survey, Stakeholders provided the following recommendations for improving the fair housing environment in Idaho:

- Require landlords to hand out fair housing information once a prospective tenant requests or submits an application;
- Provide state funding to increase fair housing education for landlords, property managers, real estate agents, renters and other appropriate parties. For renters, provide information on how to pursue a remedy if they feel like they have been discriminated against;
- Increase state funding for enforcement protocols or mechanisms to ensure landlords are following fair housing laws;
- Pass source of income discrimination laws;
- Increase funding for Idaho Legal Aid Services;
- Provide services for tenants to help them better understand their rights and help them navigate the fair housing complaint process;
- Provide increased funding for supportive services for fair housing agencies to increase accessibility; and
- Provide mediation services to help create less adversarial relationships between local landlords/business owners and fair housing advocates.

Fair Housing Legal Review

As part of this fair housing analysis, fair housing legal cases were reviewed to assess trends in Idaho legal challenges and outcomes. The sources for the cases included the Fair Housing Forum Idaho Fair Housing Cases Chronology (http://fairhousingforum.org/law/idaho-fair-housing-cases-chronology/), the National Fair Housing Advocate Online Case Database, and the United States Department of Justice (DOJ) Housing and Civil Enforcement Cases Database.

There was one new case since the last AI was conducted. As such, the cases reviewed are included in Appendix C. It is important to note that further developments may have occurred in the cases for which information is not yet publicly available.

National Fair Housing Alliance, Intermountain Fair Housing Council (IFHC) v. Rudeen Development (Disability)

This 2015 case involved alleged violations of accessibility requirements at several apartment developments in Idaho (Coeur d'Alene, Ponderay) and Washington (Spokane, Spokane Valley). The plaintiffs claim that the apartments, common- and public-use areas of the multifamily dwellings owned by Rudeen Development and other defendants were not designed or constructed with accessibility features. The case was settled in November 2015 and the Defendants agreed "to make improvements and modifications at the five apartment complexes identified above which will enhance the accessibility of apartments and common areas for persons with disabilities."[6] The Defendants also paid $225,000 to the fair housing center for damages, costs, and attorneys' fees.

Fair Housing Resources

The State of Idaho provides fair housing education and outreach and access to fair housing resources through the following activities:

Fair housing laws. Since the last AI was conducted, IHFA has worked with legislative sponsors and other groups in advance of the 2017 Legislative session to consider adding familial status as a protected class to Idaho's fair housing law.

Additionally, grantees have worked to reduce fair housing barriers through fair housing education and outreach; improve knowledge and awareness of fair housing for both housing providers and consumers; and encourage local jurisdictions to adopt best practices in land use and zoning regulations. In the past five years, IHFA and Idaho Commerce have accomplished the following:

Fair housing education. The State of Idaho has a long history of providing guidance and technical assistance to jurisdictions, both entitlement and non-entitlement communities. The state maintains two websites dedicated to fair housing, https://www.idahohousing.com/fair-housing/ and http://fairhousingforum.org/.

These websites provide resources to both stakeholders and residents. For example, training videos on fair housing best practices, fair housing basics, and how to recognize and report discrimination are provided in both English and Spanish.

The Idaho Fair Housing Forum has been in existence since 2003. The mission of the forum is to provide fair housing education and outreach opportunities throughout Idaho. These are delivered through annual events, conferences, and workshops. In the past five years, IHFA, Idaho Commerce, other partners and the Idaho Fair Housing Forum have sponsored:

- Fair housing trainings for tailored audiences, including housing professionals, real estate professionals, and transitional housing and shelter providers;
- Design and construction trainings for architects and those in the building and development industry;
- Trainings on how best to provide services to LEP populations;

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[6] https://nationalfairhousing.org/wp-content/uploads/2017/04/2015-11-17_Rudeen_Development_news_release.pdf

- Residential landlord trainings; and
- HUD Fair Housing workshops;

In 2020, IHFA was awarded a Fair Housing Initiatives Program – Education and Outreach Initiative (FHIP-EOI) grant from HUD to support several ongoing efforts to promote awareness of fair housing rights and responsibilities. IHFA utilized these resources to develop fair housing materials in English and Spanish, webinars, outreach and training events, video explainers, and to enhance its presence on social media platforms. This work has continued throughout 2021.

The Idaho Fair Housing Forum website serves as a clearinghouse for fair housing and related information to help stakeholders keep consistent with fair housing case law, training opportunities, and access fair housing resources. In addition to the Idaho Fair Housing Forum network and outreach, IHFA hosts biannual Housing Roundtable meetings in five regional centers. These well-attended events offer opportunities to share information about housing needs and challenges, as well as to maintain a productive dialogue on fair housing among housing and community stakeholders.

Progress Addressing Fair Housing Impediments

IHFA and Commerce have made progress addressing the fair housing barriers identified in the last AI through: incentives attached to funding; development of affordable housing targeted to residents with disproportionate housing needs; and significant education and outreach activities. The state's goals, action items, and progress in meeting those commitments appears in the following matrix. The only areas where IHFA and Commerce were unable to fulfill goals were associated with actions taken by the state legislature; such legislative actions are outside of the direct control of IHFA and Commerce.

Figure VIII-10.
Five-year (2016-2020) Progress Addressing Fair Housing Impediments

	Fair Housing Impediment	Strategies/Goals	Milestones	Responsible Entity	Year Completed	Actions taken/Outcomes	Outstanding Items
1	**Idaho counties' land use regulations and zoning policies may create barriers to fair housing, particularly for people with disabilities who need accessible housing and/or may live in group home settings**	**Reduce barriers in land use regulations that adversely affect fair housing choice.** 1a. During ranking and review process for CDBG projects, Commerce will continue to award additional points to projects in communities that have adopted the most recent version of the International Building Code. 1b. When HOME (and/or HTF) funds are used, the owner-developer, contractors and service providers are prohibited from discrimination based on the protected classes. Prior to the commitment of funds, a project owner must provide evidence the unit of local government in which the (multifamily rental) activity will be located, has adopted a fair housing plan. 1c. Continue to invest time and resources to educate and conduct outreach around fair housing laws and regulations to housing and planning professionals, building officials and local and state policy makers.	1a. Update the CDBG application to include additional points for adoption of recent International Building Codes 1b. Require fair housing plans as part of HOME and/or HTF funding 1c. Distribute 1,000 guides/year	IHFA and Commerce	2016	1a. Commerce has updated its CDBG application to include information about residential zoning of group homes and encourages cities and counties to amend building codes as necessary to include accessibility standards for new residential construction. 1b. Multifamily rental new construction applications must include an Alternative Site and Project Modification Analysis that complies with 24 CFR 58.5. The market study requires a census tract overlay that includes the percentage of households in poverty and minority households, and unemployed. Prior to the commitment of funds, the architectural plans, and specifications are reviewed for Fair Housing Design requirements, as applicable to the scope of the project. 1c. IHFA staff coordinated and moderated four presentations to the aforementioned stakeholder groups at a variety of conferences; distributed the AI summary document on a regular basis at stakeholder events; available online as well. IHFA and Commerce will continue to work with diverse stakeholders to promote awareness of issues raised in the AI and will continue to hold regular presentations, training events, and workshops.	

	Fair Housing Impediment	Strategies/Goals	Milestones	Responsible Entity	Year Completed	Actions taken/Outcomes	Outstanding Items
2	**Idaho's state fair housing law does not provide protection based on familial status**	**Include familial status in state fair housing protected classes.** 2a. IHFA supports updating Idaho State law to recognize "familial status" as a protected class and granting subpoena authority to the Idaho Human Rights Commission (IHRC). 2b. Commerce will pursue a change to the Idaho Administrative Code (IDAPA 28.02.01), which will allow Commerce to provide additional points to CDBG applicants that have adopted familial status protection. 2c. The Administrative Plan and HOME/HTF written agreements require owners not to discriminate or deny service to, or otherwise discriminate in the delivery of services, against any person who otherwise meets the eligibility criteria for the program on the basis of race, color, religion, sex, age, national origin, citizenship, ancestry, marital status, physical or mental disabilities, familial, and marital status, sexual orientation, gender identity, or because such person is a recipient of federal, state, or local public assistance.	2a. n/a 2b. Update the CDBG application to include additional points 2c. Written agreements.	IHFA and Commerce	2016, 2017	2a. IHFA has provided information on 'substantial equivalency' to lawmakers upon request at various times over the past decade. IHFA worked closely with legislative and other stakeholders in 2016 to prepare information needed to sponsor applicable legislation during the 2017 session. Despite those efforts, legislation never made it to a floor vote. 2b. In July 2016, the Idaho legislature approved updates to the Idaho Administrative Code for the CDBG program that allowed Commerce to include additional points for applicants who had implemented steps for familial status protections within their jurisdiction. In November 2016, Commerce provided additional points to applicants who adopted familial protections vi and ordinance or resolution. 2c. Applicants who receive HOME/HTF funds must sign a written agreement agreeing not to discriminate based on the factors described in Strategy 2c.	Legislation to add familial status to the state's fair housing protected classes has not passed.
3	**Some state policies limit local governments' ability to raise revenues potentially restricting the ability of local governments to address impediments**	**Improve local government funding sources to address affordable housing challenges.** 3a. IHFA supports and encourages tools for resource development as necessary to increase the supply of affordable housing in Idaho. IHFA will undertake efforts to support and educate local officials about the tools available to help increase community viability and workforce diversity.	3a. n/a	IHFA	2016, 2017	3a. IHFA worked closely with legislative and other stakeholders in 2016 to prepare information needed to sponsor applicable legislation during the 2017 session. Despite those efforts, legislation never made it to a floor vote.	Legislation to add flexibility in how local governments generate funding has not passed.

	Fair Housing Impediment	Strategies/Goals	Milestones	Responsible Entity	Year Completed	Actions taken/Outcomes	Outstanding Items
4	**Hispanic, Native American, elderly, and households with disabilities have disproportionate housing needs**	**Support residents with disproportionate housing needs living in non-entitlement areas.** 4a. Continue preferences for deeply subsidized rental housing. 4b. Support tenant preferences that target priority housing needs populations as identified in the 5-Year Consolidated Plan. 4c. Support partner efforts to develop a recurring source of state funding for the Idaho Housing Trust Fund, emphasizing the unique needs of non-entitlement communities. 4d. Require affordable rental housing projects to be located in communities that are committed to Affirmatively Furthering Fair Housing Choice.	4a. Complete 10 units of rental housing annually that target priority housing needs populations (disabled, elderly, ≤30% AMI). 4b. Retain current preferences in LIHTC QAP for 2017 and 2018; evaluate effectiveness of income targeting during subsequent years based on applications received in 2017 and 2018. 4c. Encourage efforts to provide state support for housing trust fund. 4d. Complete three to five multifamily housing rental projects per year in communities that support affirmatively furthering fair housing.	IHFA	2017, 2018, 2019, 2020	4a. 2017 | 4 total units completed • 4 HTF single-family units with tenant preference for three priority housing needs populations; funding for additional multi-family housing targeting disabled households at 30% AMI or below. 4a. 2018 | 82 total units planned for/completed(?) • 48 multifamily rentals targeting elderly population (Eagle, ID) • 4 single-family units at 30% AMI or below for refugee populations • 30 multifamily units for victims of domestic violence; 2 units at 30% AMI or below 4a. 2019 |9 total units completed; 8 other units planned for • 5 HOME multifamily units for chronically homeless with disabilities and 4 HTF single-family units at 30% AMI or below completed • 2 HTF multifamily projects with 5 multifamily units at 30% AMI or below planned for • 3 HTF single-family units at 30% AMI or below planned for 4a. 2020 |32 total units completed • 18 HOME multifamily units (9 for elderly populations, 9 for populations at 30% AMI or below) • 12 HTF multifamily units at 30% AMI or below • 2 single-family units at 30% AMI or below 4b. The QAPs between 2017 and 2020 retained a preference for project applications that target very low and extremely low-income households. In 2017, additional points were provided for projects providing permanent supportive housing to homeless individuals; in 2018, additional points were provided for permanent supportive housing for homeless veterans. In 2019 and 2020, the QAP also retained a preference for projects that had permanent supportive housing for homeless and/or disabled individuals. 4c. No committee action was taken over the last four legislative sessions (2017-2020). 4d. The QAP and Annual Administrative Plans between 2017-2020 have required communities who submit an application for HOME, HTF, or LIHTC funding to prove their commitment to Fair Housing, either through an adopted Fair Housing Resolution, Fair Housing Plan, or an Analysis of Impediments to Affirmatively Further Fair Housing (for CDBG Entitlement Communities). In 2017, multifamily rental projects receiving LIHTC, HOME and HTF funding were (planned for/developed) in the following communities who committed to affirmatively furthering fair housing: Eagle, Caldwell, Nampa, Boise, Twin Falls, and Ammon. Between 2018 and 2020, development rentals and/or homebuyer projects were completed in the following counties: Ada, Bannock, Blaine, Bonner, Canyon, Kootenai, Nez Perce, and Latah.	Legislative action to create a recurring source of revenue for the state trust fund.

	Fair Housing Impediment	Strategies/Goals	Milestones	Responsible Entity	Year Completed	Actions taken/Outcomes	Outstanding Items
5	**Hispanic, Native American, and African American households have disproportionately low homeownership rates**	**5a. Help qualified renters attain homeownership** through credit counseling and homeownership readiness though affirmative marketing.	5a. Continue Finally Home! Homebuyer Education classes in Moscow, Sandpoint, Coeur d Alene, Idaho Falls, Twin Falls, Nampa, and Boise, and online to reach 5,000 or more potential homebuyers. Continue bilingual outreach, training, and customer service efforts.	IHFA	2017, 2018, 2019, 2020	5a. Between 2017 and 2020, over 25,600 potential homebuyers participated in the Finally Home! Homebuyer Education classes. Bilingual outreach, training and customer services efforts were made available.	
6	**Landlord lack of fair housing awareness resulting in fair housing complaints and higher use of publicly subsidized housing by minority residents**	**Increase fair housing knowledge.** 6a. Continue current fair housing capacity building and educational outreach activities, particularly among property owners and persons with disabilities. 6b. Continue to provide information about and support expansion of state fair housing protections to include familial status. 6c. Continue to award preferences points to CDBG applicants with fair housing protections that include familial status. 6d. Require affordable rental housing projects to be located in communities that are committed to Affirmatively Furthering Fair Housing Choice or have adopted a Fair Housing Plan (CDBG non-entitlement areas).	6a. With Idaho Fair Housing Forum partners, support 2 to 10 fair housing training events annually with landlord groups 6b. Support efforts to add familial status to state protections. 6c. During program years 2017-2020, Commerce will continue to award preference points to CDBG applicants that include fair housing protections for familial status. 6d. HOME and HTF written agreements specify Federal fair housing and nondiscrimination laws, including familial status as a protected class in accordance with Title VIII of the Civil Rights Act of 1968.	IHFA: 1, 2, and 4 Commerce: 3	2017, 2018, 2019, 2020	6a. Between 2017 and 2020, IHFA coordinated or participated in the following events: • 2 Fair Housing workshops for housing providers, managers, realtors and lenders • 2 Fair Housing Design and Construction workshops/trainings for housing providers, managers, architects, engineers, builders and developers • 1 residential landlord training • 1 Fair Housing Forum training put on by IHFA and FHF partners • 6 statewide Fair Housing webinars for property owners and managers with over 900 participants. • 4 statewide Fair Housing webinars for housing providers, professionals, advocates and consumers, real estate professionals, property managers, transitional housing providers, homeless and domestic violence shelter providers, local governments with over 100 participants. • 1 bilingual webinar in southern Idaho for Spanish speaking individuals • Participation and promotion of IHFA and FHF partners in the National Training Academy AFFH Training and LEP webinar • 3 conferences on fair housing, housing justice, and economic development, including participation in multiple panels and presentations by IHFA and FHF members. 6b. In 2017, IHFA researched efforts by surrounding states to determine options for Idaho to achieve substantial equivalency by adding familial status to Idaho Fair Housing law. During a 8/30/17 meeting with Joseph Pelletier, Director of the Fair Housing Assistance Program, IHFA learned it is ineligible to pursue this on behalf of the state of Idaho. IHFA subsequently turned over all findings to the Idaho Department of Labor/Idaho Commission on Human Rights. IHFA continues to educate policymakers about the many benefits of achieving substantial equivalency and looks forward to an eventual change in status. 6c. Between 2017 and 2020, Commerce awarded preference points to 99 CDBG applicants that included fair housing protections for familial status. 6d. Between 2017 and 2020, HOME and HTF written agreements included language regarding ongoing compliance with the Federal Fair Housing and Nondiscrimination laws, and regulations, including familial status as a protected class in accordance with Title VIII of the Civil Rights Act of 1968.	

	Fair Housing Impediment	Strategies/Goals	Milestones	Responsible Entity	Year Completed	Actions taken/Outcomes	Outstanding Items
7	**Housing in rural areas developed without Visitable/accessible features due to limited development in rural areas and when housing was developed. Local policies that limit group homes.**	**Increase accessible, affordable housing options.** **7a**. Continue with HOME, HTF, and LIHTC application preference points for rental housing that benefits elderly, ≤30% AMI households, and persons with disabilities. 7b. Explore ways to incent Visitable housing. 7c. Explore peer states' efforts to create assisted living-like community supported environments in rural communities. 7d. Continue educational efforts to inform local jurisdictions of best practices and legal risks associated with land use and zoning laws, including requiring conditional use permits for group homes. 7e. Encourage use and completion of Transition Plans and prioritize CDBG to making identified needed accessibility improvements. 7f. Explore creation of a more coordinated and comprehensive effort to address the access needs of persons with disabilities.	7a. Retain current preferences in QAP and Administrative Plan. 7b. Provide funding preferences for Visitable single-family rental housing. 7c. Encourage regional partners to use Avenues for Hope and other private funding options to create accessible home modification in rural communities. 7d. Coordinate annual training on best practices in land use and zoning, focusing on group homes. 7e. Five percent of all new multifamily rental housing will be wheelchair accessible; two percent will accommodate persons living with sensory impairments. 7f. Continue to market ADA improvements as eligible activities for CDBG - Complete 15 projects that improve ADA accessibility during 2017-2021 assuming national objectives are being met. Ensure all CDBG grantees (cities and counties) have updated their ADA Transition Plans prior to project closeout. Increase CDBG application priority ranking points for projects that focus on the removal of architectural barriers or improve ADA accessibility.	IHFA: 1, 2, 3, 4, 5 Commerce: 6	2017, 2018, 2019	7a. Between 2017-2019, multifamily rental applications receive additional scoring points if the owner commits to serving households with annual incomes at or below 30% AMI, or disabled, or elderly (age 62+). 7b. In 2017, developers constructing or rehabilitating single-family rental housing were required to include IHFA's visitability requirements to the maximum extent feasible. In 2018 and 2019, a combined 19 visitable single-family rental housing units (new construction and rehabilitation) were created. Additionally, eight new multifamily construction projects were completed, which required a minimum 5% of the units to be handicap accessible, with an additional 2% accessible for persons with hearing and visual disabilities. 7c. No funding available between 2017-2019 to encourage regional partners to create accessible home modification in rural communities. 7d. • 2017 | 4 trainings on best practices in land use and zoning were held around the state; • 2018 | 2 trainings on best practices in land use and zoning were held around the state; one planned training did not occur due to lack of funding. • 2019 | 3 trainings on fair housing implications in planning practices were held throughout the state; one planned training did not occur due to lack of funding. 7e. Between 2017 and 2019, multifamily rental housing project architects were required to certify their design specifications will meet, as applicable to the type of project (new construction vs. rehabilitation) the following: Fair Housing Accessibility Guidelines, Section 504 of the Rehabilitation Act and HUD's Fair Housing Design Criteria (if federal funding in the projects), Americans with Disabilities Act, and Uniform Accessibility Standards. Between 2017-2019, 23 CDBG funded projects were approved to help improve ADA accessibility in applicants' respective communities. With the exception of post disaster grants, all CDBG grantees between 2017 and 2019 were required to update their transition plans, as per the Commerce grant agreement. The State of Idaho Legislature approved a scoring point increase for projects that improve ADA accessibility. The State rule change was enacted for 2017 CDBG projects and all CDBG projects in subsequent years.	No regular source of funding for accessible home modifications.

	Fair Housing Impediment	Strategies/Goals	Milestones	Responsible Entity	Year Completed	Actions taken/Outcomes	Outstanding Items
8	**Housing developed with limited Vistable or Accessible features; access or proximity to public infrastructure; local policies associated with land use and zoning, including those that limit group homes.**	**Increase accessible, affordable housing options.** 8a. Continue with HOME, HTF application preference points for rental housing that benefits elderly, disabled, ≤30% AMI. 8b. Explore ways to incent Visitable housing. 8c. Continue to support educational efforts to inform local jurisdictions of best practices and legal risks associated with land use and zoning laws, including requiring conditional use permits for group homes. 8d. Provide funding preference for needed accessibility improvements. 8e. Explore creation of a more coordinated and comprehensive effort to address the access needs of persons with disabilities.	8a. Retain current preferences in Administrative Plan. 8b. Provide funding preferences for Visitable single-family rental housing. 8c. Coordinate annual training on best practices in land use and zoning, focusing on group homes. 8d. Five percent of all new multifamily rental housing will be wheelchair accessible; two percent will accommodate persons living with sensory impairments. 8e. Continue to market ADA improvements as eligible activities for CDBG Complete 15 projects that improve ADA accessibility during 2017-2021 assuming national objectives are met. Ensure all CDBG grantees (cities and counties) have updated their ADA Transition Plans prior to project closeout. Increase CDBG application priority ranking points for projects that focus on the removal of architectural barriers or improve ADA accessibility.	IHFA: 1,2,3 and 4 Commerce: 5	2020	8a. In 2020, multifamily rental applications receive additional scoring points if the owner commits to serving households with annual incomes at or below 30% AMI, or disabled, or elderly (age 62+) 8b. In 2020, 4 visitable single-family rental housing units (new construction or rehabilitation) were created. Additionally, six new multifamily projects were completed, which required a minimum 5% of the units to be handicap accessible, with an additional 2% accessible for persons with hearing and visual disabilities. 8c. In 2020, two trainings were held to inform local jurisdictions of best practices and legal risks associated with land use and zoning laws, including requiring conditional use permits for group homes. 8d. In 2020, 14 units of multifamily rental housing were constructed to be wheelchair accessible while 5 units were constructed to accommodate persons living with sensory impairments. In 2020, 9 CDBG funded projects were approved to help improve ADA accessibility in applicants' respective communities.With the exception of post disaster grants, all of the 2020 CDBG grantees were required to update their transition plans, as per the Commerce grant agreement. The State of Idaho Legislature approved a scoring point increase for projects that improve ADA accessibility. The State rule change was enacted for 2020 CDBG projects.	

	Fair Housing Impediment	Strategies/Goals	Milestones	Responsible Entity	Year Completed	Actions taken/Outcomes	Outstanding Items
9	**Gaps in educational achievement for students with disabilities; African American, Native American and Hispanic students; LEP students; and students in transition and at-risk and economically disadvantaged students**	**Help address education proficiency gaps.** 9a. Consider Utah's best practice of adding preferences for LIHTC location in areas with high proficiency schools	9a. Explore effectiveness of Utah's LIHTC program in 2019 and 2020 (after it has been utilized for three years)	IHFA	2017, 2018, 2019, 2020	9a. IHFA reached out to Utah's LIHTC program, and found many projects take advantage of the additional points awarded based on 5 factors: Preference locations with school proficiency, job access and labor market engagement, poverty, and housing stability. The challenge is these areas have more expensive land values, which can bring insurmountable costs for a project unless cities and jurisdictions participate in some fashion (donate land, carry back a low interest note).	
10	**Low wages in economically disadvantaged rural areas due to limited economic growth and growth in low wage industries (e.g., service jobs)**	**Increase employment in economically disadvantaged communities.** 10a. Continue to allocate CDBG to job creation activities in rural communities.	10a. Use CDBG funds to leverage the creation of 30 moderate to high paying jobs created or retained annually, 2017 through 2020	Commerce	2017, 2018, 2019, 2020	10a. Between 2017 and 2020, Commerce received two CDBG job creation applications. Commerce also provided staff support for six community reviews to help create economic development and job creation strategies.	
11	**Inaccessible (pre-ADA) public buildings, commercial establishments, and infrastructure. Lack of funding for - and high cost of - accessibility improvements to streets, sidewalks, and other public infrastructure.**	**Dedicate additional federal support to increasing employment and accessibility in non-entitlement areas.** 11a. Support federal efforts to expand infrastructure redevelopment in rural areas and ensure that these include creating environments that are more accessible.	11a. Activities to be determined in future action plans depending upon federal activities to improve infrastructure. 11b. Promote community accessibility practices such as Ramp Up Idaho to increase awareness of access and opportunity.	Commerce: 1 IHFA: 2	2017, 2018, 2019, 2020	11a.Between 2017 and 2020, Commerce attended four quarterly meetings with other infrastructure funding agencies, USDA-RD, DEQ, and USACE. Commerce helps provide support and guidance to these federal agencies in their efforts to improve infrastructure and facilities in rural communities. 11b. Between 2017 and 2020, IHFA coordinated or participated in 16 panels/sessions. - 2017: Coordinated one panel and promoted Ramp Up Idaho, fair housing design and construction, and ADA principles at five conferences/summits. -2018: Participated or coordinated six presentations about importance of residential and community access and housing choice. Continued to promote Ramp Up Idaho, fair housing design and construction, ADA principles and other materials on fair housing laws at conferences, meetings, and trade shows. - 2019: Participated or coordinated six presentations about the importance of residential and community access and housing choice. -2020: Coordinated three sessions on inclusive planning and design for planning and policy professionals. Participated in Neighborhood Access Audits and Statewide ADA Recreation Committee projects to assess park, trail and recreational access for persons with disabilities.	

	Fair Housing Impediment	Strategies/Goals	Milestones	Responsible Entity	Year Completed	Actions taken/Outcomes	Outstanding Items
12	**Insufficient transportation services to support independent, integrated community living for seniors and persons with disabilities. Lack of public transportation in rural areas.**	**Dedicate additional federal support to increasing employment and accessibility in non-entitlement areas—contingent on participation of Idaho Transportation Department and Federal Highway Administration.** 12a. Encourage local government grantee's ability to play a role in transportation planning at the state and regional levels. 12b. Through AAAs, roundtable discussions, public-private partnerships, explore the demand to expand and create formal rideshare programs in rural communities with need.	12a. Ensure CDBG grantees (cities and counties) located in resort communities or college towns have completed the transportation component of their comprehensive plan (as per Idaho's Local Land Use Planning Act). At a minimum, the transportation component should assess bicycle and pedestrian circulation and the existing (or feasibility of) public transportation - bus or van. Further, the city or county should address the transportation factors that are contributing to limiting opportunities for its residents in their fair housing assessment.	Commerce: 1 IHFA: 2	2017, 2018, 2019, 2020	12a. Between 2017 and 2020, all CDBG applicants (Grantees) were required to identify if the transportation component of their plan did address public transportation options. Additional points were awarded to applicants who had addressed public transportation options. Commerce's CDBG program does request Grantees to review the transportation options in their community under their Fair Housing Assessment. 12b. IHFA staff continue to maintain contact with partners through ITD's Statewide Bicycle and Pedestrian Advisory Committee (BPAC) to promote diverse transportation and mobility options.	
13	**Challenges in housing persons with criminal backgrounds who cannot qualify for publicly supported housing and for whom private sector may be reluctant to provide housing.**	**Explore programs to provide housing options for persons with criminal backgrounds, particularly those who are disproportionately represented by certain protected classes.** 13a. Explore best practices (e.g., Sponsors, Inc. in Oregon) to assist men and women in corrections re-integrating into communities. 13b. Educate housing partners statewide on appropriate language on criminal backgrounds in rental agreements.	13a and 13b. Publish annual updates and information in Cornerstones and Rent Sense newsletters; include best practice information in correspondence to affordable housing providers.	IHFA	2017, 2018, 2019, 2020	13a and 13b. IHFA no longer publishes “Cornerstones” or “Rent Sense” newsletters; relevant outreach and updates on best practices are disseminated via stakeholder networks and conferences. Fair Housing trainings provided by HUD and offered through Idaho AHMA (Idaho's Affordable Housing Management Association) and Fair Housing Forum partners continue to include a section regarding VAWA, criminal background checks, and reasonable tenant selection policies regarding "criminal history". VAWA language is included in the HOME and HTF project regulatory agreements with owners.	