

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

2025



Preface

This Analysis of Impediments to Fair Housing Choice was produced on behalf of the City of Boise by Grow America, under contract to the City of Boise Housing and Community Development Division, Planning and Development Services Department. Grow America would like to thank the leadership and staff at the City of Boise for their participation in this effort. Most importantly, we thank the many stakeholders, ranging from residents to advocates to nonprofit and for-profit housing industry representatives who provided input through various focus groups, public meetings, surveys, and interviews.

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EXECUTIVE SUMMARY

Summary of Findings

The Fair Housing and Equal Opportunity (FHEO) Office at the Department of Housing and Urban Development (HUD) advises communities to complete an Analysis of Impediments (AI) to Fair Housing Choice as a complimentary document to their five-year Consolidated Plan. In addition, as part of the Consolidated Plan, grantees are required to submit an AFFH (Affirmatively Furthering Fair Housing) certification which requires them to undertake Fair Housing Planning through the completion of an AI, actions to eliminate any identified impediments, and maintenance of AFFH records.

As recipients of Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Program funds, the City of Boise in compliance with this requirement has produced this Analysis of Impediments to understand the challenges around fair housing, and the limitations to housing choice. This analysis was conducted using both qualitative and quantitative analysis. The qualitative analysis consisted of a full public participation process, including community engagement activities, focus groups, one on one consultations, and resident and service/housing provider organization surveys. The in-person activities included information sharing, discussion, and polling. The quantitative analysis utilized data from a variety of sources, seeking to understand regulatory requirements, policy, and practices relevant to this topic; and to understand community dynamics, availability of housing, access to opportunity, enforcement, education, and resources around fair housing.

The findings from the qualitative and quantitative analyses identified the following nine (9) impediments to fair housing choice. The Impediments and Recommendations section of this document outlines a plan for addressing each of these impediments.

- 1) Lack of Supply of Affordable Housing
- 2) Prior Criminal Records
- 3) Eviction History
- 4) Limited Housing Options for Seniors
- 5) Discrimination
- 6) Housing Reentry
- 7) Public & Non-Motorized Transportation
- 8) Negative Perception of Affordable Housing
- 9) Complex Application Process to Access Services and Housing

Update & Status of Previously Identified Impediments

In 2021, the City of Boise participated in a Regional Analysis of Impediments to Fair Housing Choice with the cities of Caldwell, Meridian, and Nampa, Idaho. This analysis was completed by Vitruvian Planning, PHR Consulting, and Ecosystem Sciences, and found 10 regional impediments. The seven (7) impediments that were identified specifically for Boise were as follows:

- 1) Discrimination
- 2) Lack of knowledge about fair housing roles and responsibilities of consumers and providers
- 3) Language barriers
- 4) Lack of compliance with fair housing laws

- 5) Increased cost of rental and for sale housing
- 6) Neighborhood resistance to affordable housing development
- 7) Regulatory and economic factors which limit housing choice

The previous Analysis of Impediments included eleven (11) recommendations. The recommendations and their status are as follows:

Completed Recommendations

- 1) Create a Fair Housing website and provide Fair Housing information at community forums, meetings, and to housing providers and subgrantees.
- 2) Update the City's Language Access Plan and provide translation/interpretation for printed materials and at community events.
- 3) Provide education for housing providers and property managers to ensure equal treatment for those seeking housing.
- 4) City's Title VIII Coordinator should provide assistance for those seeking to file a complaint.
- 5) Fair Housing information posted at all City facilities, and subgrantee facilities.
- 6) Effective and efficient plan review.
- 7) Review of density limitations, minimum lot sizes, and other local ordinances that may restrict opportunities to produce smaller apartments and for sale homes.
- 8) Assess publicly owned properties that could be used for affordable housing, including underutilized parcels.
- 9) Conduct outreach and education to create a better community understanding of the critical rental housing shortage.

Ongoing Recommendation

- 10) Expend federal resources to support homeownership opportunities and rental housing development for very low- and low-income households, including collaborating with other financing agencies.

Incomplete Recommendation

- 11) Prepare model provisions for Homeowners' Associations (HOA) and Covenants, Conditions and Restrictions (CCR) that outline Fair Housing and accessibility compliance.

Fair Housing Planning

The Department of Housing and Urban Development is committed to eliminating racial and ethnic segregation, illegal physical and other barriers to persons with disabilities, and other discriminatory practices in housing. The fundamental goal of HUD's fair housing policy is to make housing choice a reality through Fair Housing Planning (FHP). Fair housing planning involves reviewing local data and gathering feedback from local stakeholders to identify factors that contribute to housing-related discrimination in a community. This information is then used to develop goals that seek to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on certain protected characteristics. Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of housing based on race, color, national origin, religion, sex, familial status, or disability. The City of Boise prohibits the denial to or discrimination against any

person because of sexual orientation and/or gender identity/expression in the sale, purchase, lease, or rental of any housing accommodation, or to otherwise discriminate in the terms and conditions, maintenance, improvement, or repair of any housing accommodation.¹

ANALYSIS OF IMPEDIMENTS (AI): BASIC DEFINITION, GUIDE, & USE

The AI is one (1) of three (3) components of a Fair Housing Plan. A Fair Housing Plan includes the AI, the actions to be taken to remedy the impediments, and the maintenance of records of these actions. The purpose of the AI is to identify problems that impact fair housing and to increase housing choice.

The AI is a review of impediments to fair housing choice in the public and private sector. Impediments are defined as: 1) Any actions, omissions, or decisions **taken because** of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices; or 2) Any actions, omissions, or decisions **which have the effect** of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

To identify these impediments, communities should conduct a study that includes the following:

- 1) An assessment of conditions, both public and private, affecting fair housing choice for all protected classes, which are defined in the Citizen Participation Plan as “groups of people who are legally protected from discrimination based on a shared characteristic. Individuals are protected from discrimination based on race sex, color, national origin, religion, age (over 40), mental or physical disability, or familial status.”
- 2) An assessment of the availability of affordable, accessible housing in a range of unit sizes.
- 3) A comprehensive review of the City of Boise’s (herein referred to as the “City”) laws, regulations, administrative policies, procedures, and practices.
- 4) An assessment of how those laws, regulations, administrative policies, procedures, and practices affect the location, availability, and accessibility of housing.

Methodology & Process

The methodology to collect fair housing information included several tools and engagement strategies.

- 1) The City of Boise Housing and Community Development Division and Grow America developed and deployed an online Community Survey. The survey was accessed by the public through a link on the City’s website, and shared at community meetings, engagement events, focus groups, and stakeholder meetings.
- 2) Community meetings gathered in-person feedback from residents throughout the City. These meetings were conducted concurrently with the survey. Preliminary survey results helped to inform the public outreach dialogue. To ensure that feedback reflected the broader City geography, community meetings were held at Hillcrest Library (Boise Bench) and the Ustick Library (West Boise).

¹ <https://www.cityofboise.org/programs/fair-housing>

- 3) Stakeholder consultations are critical for the Analysis of Impediments. City staff identified specific groups and individuals who have had deep experiences, specific insight on key priorities, or who may have been underrepresented during the outreach phase. These consultations facilitated the gathering of diverse perspectives to better understand the issues, concerns, and identify potential approaches and impacts.
- 4) Focus groups included guided discussions on topics that were identified through the engagement process. The following groups participated in the focus groups:
 - a) Service Providers
 - b) Housing Developers/Real Estate Agents
 - c) Fair Housing Agency
 - d) Idaho Legal Aid Eviction Prevention and Legal Aid organizations
 - e) Rapid Rehousing agency
 - f) Public Housing Authorities

Data Sources

This section describes the key sources of data most often used in this report.

American Community Survey (ACS)

The American Community Survey (ACS) is an ongoing survey that provides vital information on a yearly basis about our nation and its people. Information from the survey generates data that help inform how trillions of dollars in federal funds are distributed each year.

Source: <https://www.census.gov/programs-surveys/acs/about.html>

U.S. Census Bureau

The Census Bureau collects data through a variety of methods including:

- 1) The Decennial U.S. Census, also known as the Population and Housing Census, is designed to count every resident in the United States.
- 2) The Economic Census is the U.S. Government's official five-year measure of American business and the economy for planning and key economic reports, and economic development and business decisions.
- 3) The Census of Governments occurs every five years. It identifies the scope and nature of the nation's state and local government sector; provides authoritative benchmark figures of public finance and public employment; classifies local government organizations, powers, and activities; and measures federal, state, and local fiscal relationships.

Source: <https://www.census.gov/programs-surveys/censuses.html>

HUD Affirmatively Furthering Fair Housing Data & Mapping Tool

The Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) is publicly available for use by program participants to access HUD-provided data to conduct the fair housing analysis required as part of the Assessment of Fair Housing.

Source: <https://egis.hud.gov/affht/>

Policy Map

Policy Map is a web-based tool for policymakers, business leaders, and researchers to quickly visualize and understand communities across the U.S.

Source: <https://www.policymap.com/about>

COMPASS

The Community Planning Association of Southwest Idaho (COMPASS) compiles data from Ada and Canyon Counties for purposes of developing long-range plans. Every local government in the two counties is a member. Building permit data is compiled for the region and reported in their annual Development Monitoring Report.

Source: [Development Monitoring Report - COMPASS](#)

Fair Chance Ordinance - An Advocate's Toolkit

The Fair Chance Ordinance - An Advocate's Toolkit is a resource used to support the implementation of a fair chance ordinance, which aims to reduce barriers that justice-impacted individuals frequently face when they seek housing.

Source: https://www.nhlp.org/wp-content/uploads/021320_NHLP_FairChance_Final.pdf

Home Mortgage Disclosure Act (HMDA) Data

The Federal Financial Institutions Examination Council (FFIEC) provides access to Home Mortgage Disclosure Act (HMDA) data, which includes information on mortgage applications and denials. HMDA data are the most comprehensive source of publicly available information on the U.S. mortgage market.

Source: <https://ffiec.cfbp.gov/data-publication/2023>

COMMUNITY PROFILE

Geography, Demographic, & Economic Overview

Description of Boise

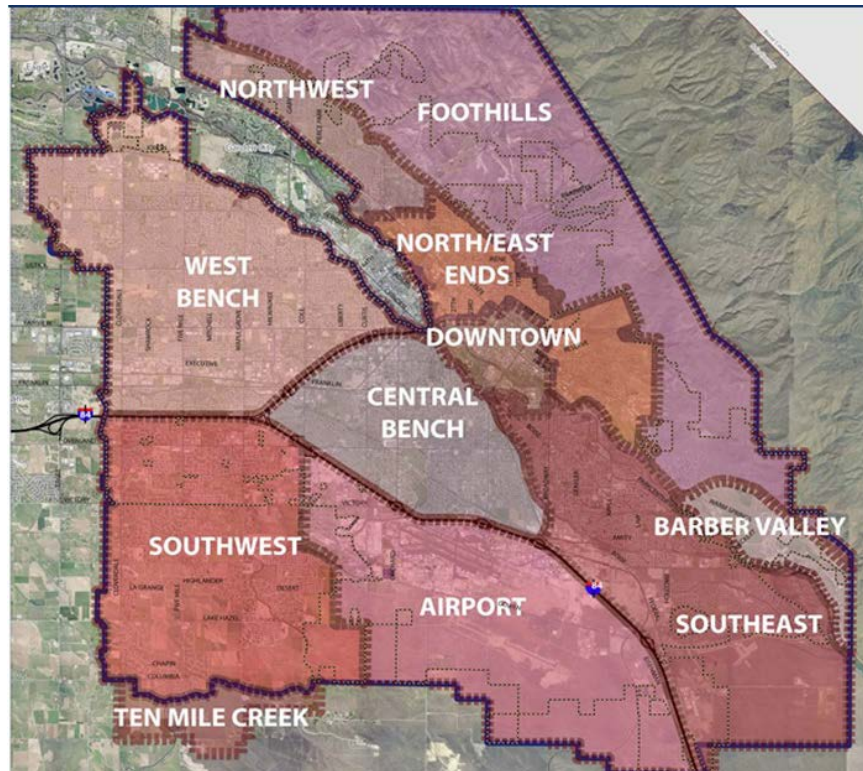
Boise is the capital and largest city of Idaho, located along the Boise River in southwestern Idaho. It is known for its vibrant community and beautiful natural surroundings. As of the 2022 Census², Boise has a population of approximately 236,632 residents in an area of 80.05 square miles. Boise's economy is diverse, with significant contributions from technology, healthcare, manufacturing, timber, retail, and outdoor recreation. The City also benefits from federal and state government employment and is home to the state's largest university.

The City of Boise consists of ten (10) planning areas within its Area of City Impact (AOCI). The planning areas are Northwest, Foothills, North/East Ends, Downtown, Central Bench, Southeast, Barber Valley, Southwest, Airport and West Bench.³

² <https://data.census.gov/table/ACSDP1Y2022.DP05?q=Boise+City+city,+Idaho+population>

³ https://www.cityofboise.org/media/3035/bb_cha%er_4_intro-05232021.pdf

Boise Planning Areas

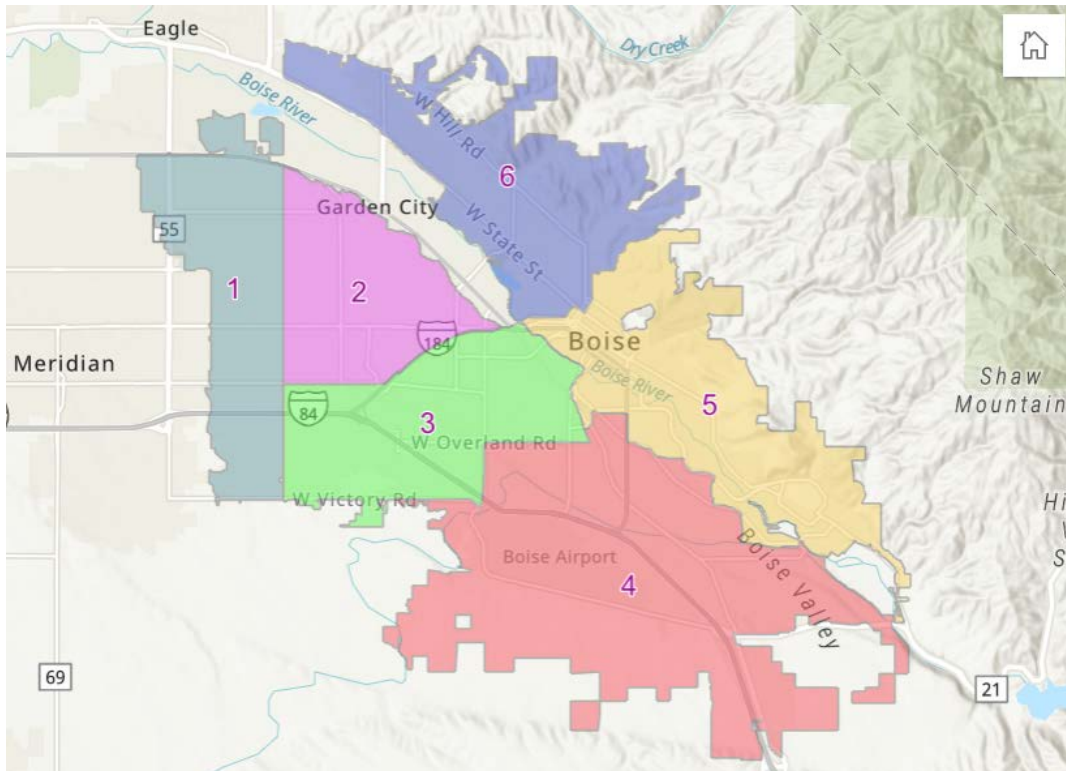


Source: [Boise Blueprint](#)

Boise Council Districts

In 2020, the State of Idaho passed legislation requiring cities of over 100,000 residents to elect their council members by districts. As the statute requiring election by districts does not dictate how to create districts, Boise's City Council decided on a resident commission process and established the Boise Districting Commission. This Commission consisted of five Boise residents who were eligible to vote and who represented a cross section of the community. To form the districts for the 2023 election, a districting map was created based on 2020 census data. In 2023, all six council districts were up for election using the new map. The odd-numbered districts elected councilpersons for four-year terms and the even-numbered districts elected councilpersons for two-year terms to stagger council elections. In subsequent elections, all terms will be four-year terms.

Boise Districting Commission Map



Source: [City Council District Lookup](#)

Demographic Data

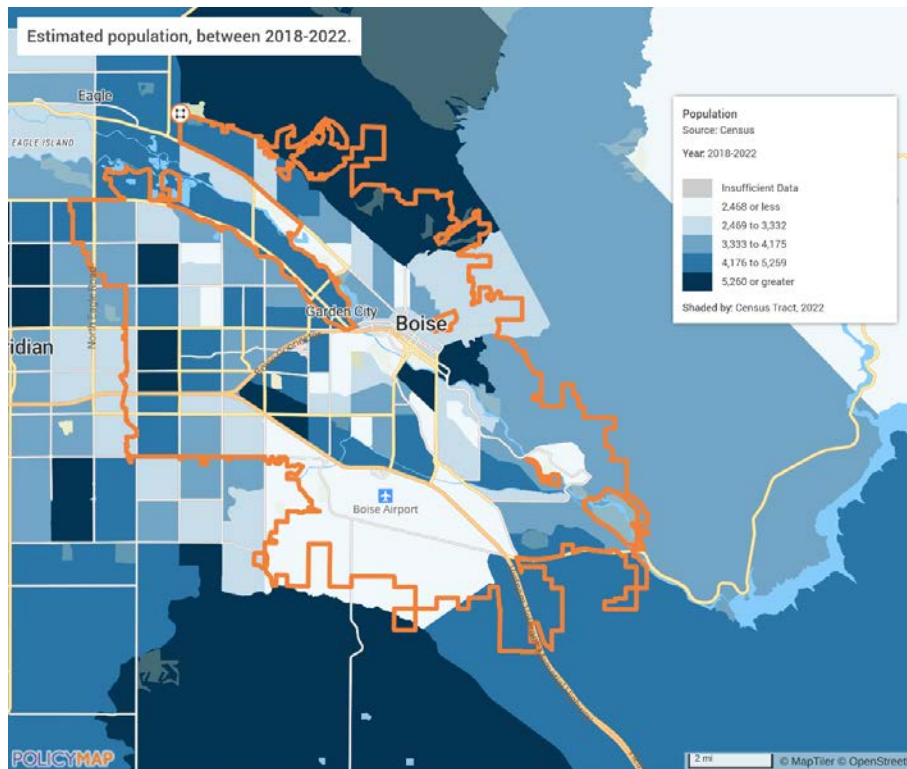
The City's demographics reflect a mix of long-time residents and newcomers drawn to its cost of living, outdoor lifestyle, and economic opportunities, particularly in the technology, healthcare, and construction sectors. The median age in Boise is 38 years, which has remained unchanged based on the last 5-year estimate (2018-2022). There are approximately 98,992 households in Boise. The number of households increased by 1.95% through 2022. Boise is experiencing an increase in the disabled population; however, the unhoused population decreased by 17.99%.

	2018	2022	5-Year Change
Population	228,807	236,632	3.42%
Median Age	37.90	37.90	0.00%
Number of Households	97,101	98,992	1.95%
Avg. Household Size	2.96	2.32	-21.62%
Disabled Population	24,133	26,997	11.87%
Unhoused Population	756	620	-17.99

Source: 2018-2022 American Community Survey and Point-in-Time Counts

While Boise is experiencing significant population growth, the growth rate differs between neighborhoods. The City's highest growth rates are in the North End, Downtown, the Hillcrest neighborhoods and the areas northwest and west of downtown. The neighborhoods experiencing lower growth rates include areas in the Central Rim, Morris Hill, South Boise, and Vista.

Population Growth from 2018-2022



Source: 2018-2022 American Community Survey

Income Data

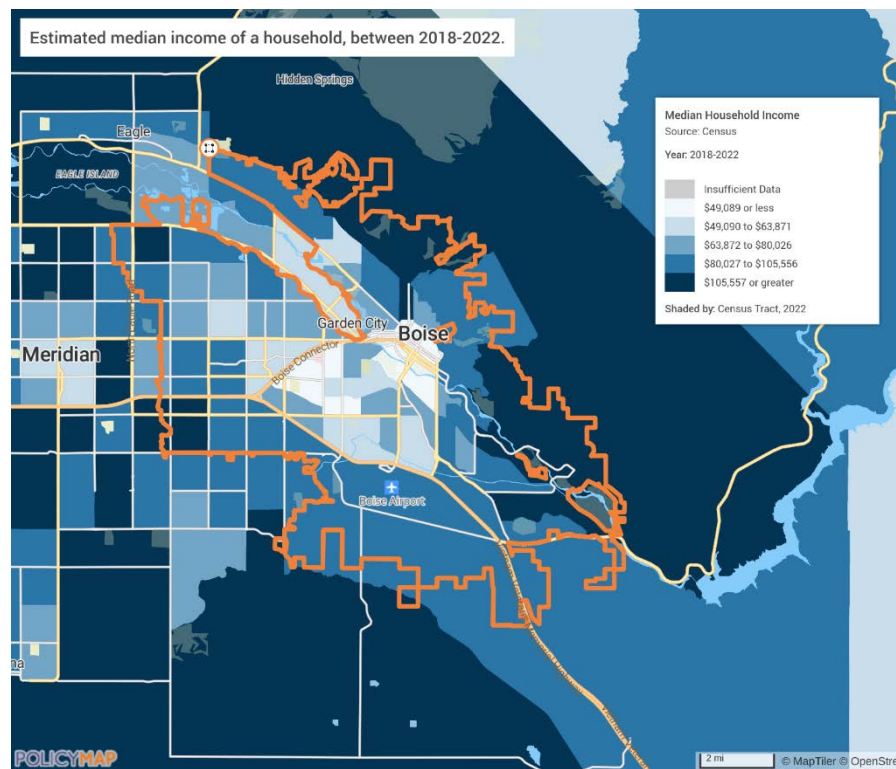
The 2024 median income in Boise for a household of four is \$98,700.⁴

The neighborhoods with highest household incomes include Southeast Boise, the North End, Barber Valley, and Foothills. The neighborhoods with the lowest household incomes are typically found in the central parts of the city. Specifically, the Downtown area has one of the lowest median household incomes, around \$34,158, which is significantly lower than the city's median household income.⁵ The reasons that the Downtown area has low median household incomes include the fact that there are higher concentrations of rental properties, which can attract younger residents, students, and transient populations who may have lower incomes. Downtown Boise also attracts a diverse population, including artists, students, and young professionals, who may be in the initial stages of their careers and earning lower incomes.⁴

⁴ <https://www.cityofboise.org/departments/planning-and-development-services/housing-and-community-development/income-guidelines/>

⁵ <https://bestneighborhood.org/household-income-downtown-boise-id/>

Estimated Median Income of a Household, between 2018-2022

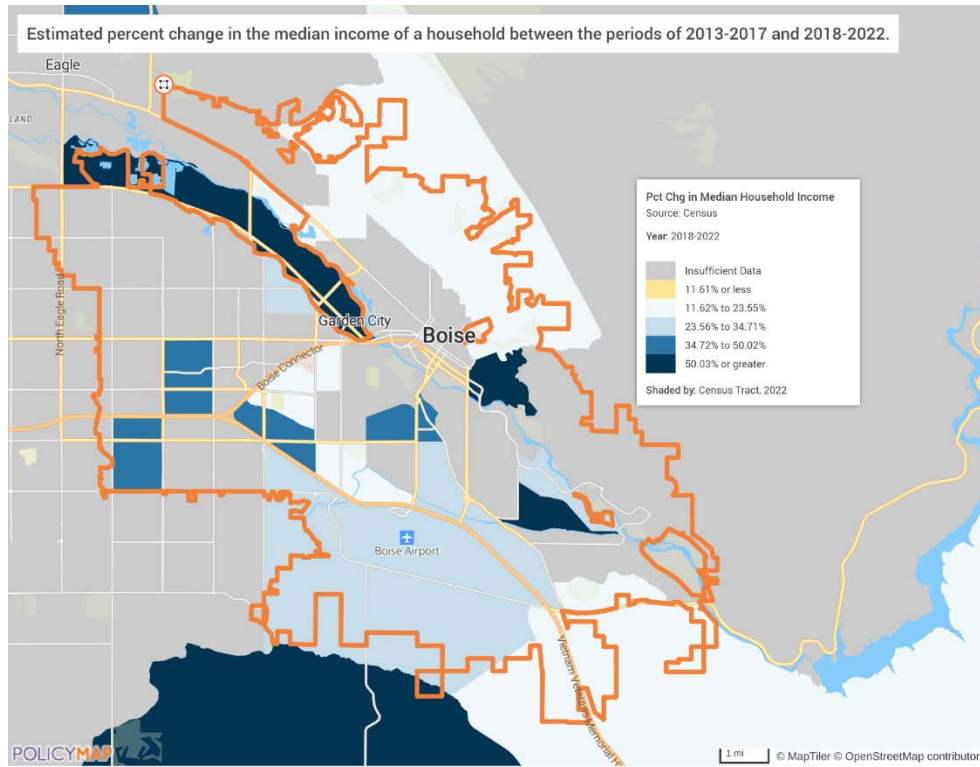


Source: 2018-2022 American Community Survey

Between 2018 and 2022, Boise experienced significant changes in median household income. According to the American Community Survey, the median household income in Boise rose from approximately \$66,400 in 2018 to around \$81,425 in 2022. The income growth in Boise can be attributed to several factors, including population growth; wage increases in sectors such as healthcare, social assistance, accommodations, food service, and education; and the rise in remote work which allowed individuals employed by companies in higher-wage states to live in Idaho, where the cost of living is generally lower.⁶

⁶ <https://www.ktvb.com/article/news/local/idaho-median-household-income-growth-leads-nation-us-census-bureau/>

Estimated Percent Change in Household Median Income, between 2018-2022



Source: 2018-2022 American Community Survey

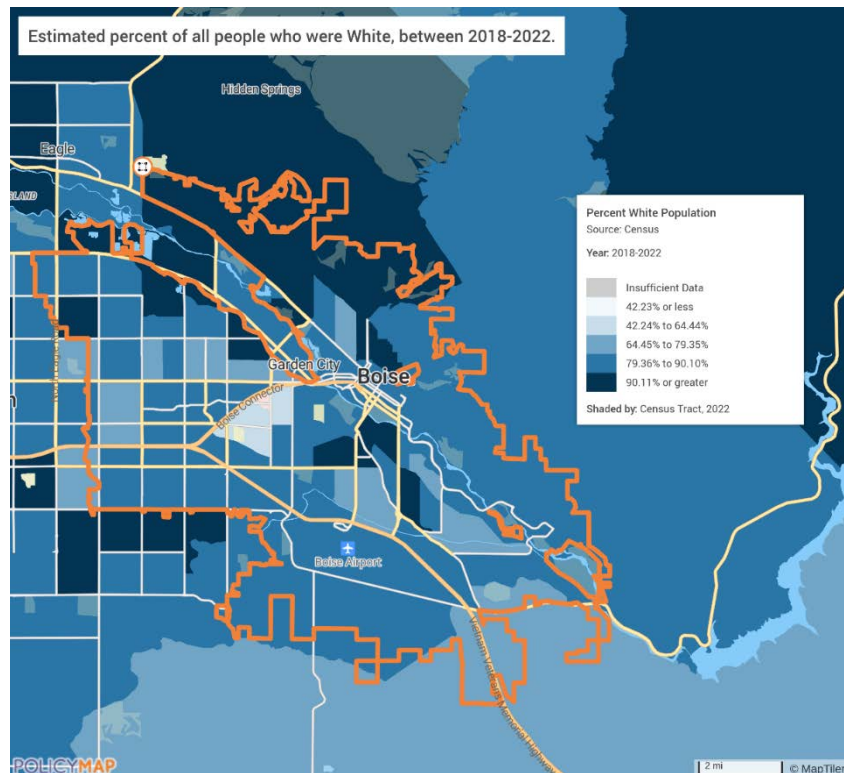
Minority Population

The racial and ethnic composition of Boise is predominantly White (82.2%) but is declining slightly, with Hispanic or Latino residents making up about 9.1% of the population. Smaller but growing communities include Asians (3.0%), Black or African Americans (1.2%), Native Americans (0.5%), Native Hawaiian/Pacific Islander (0.3%) and individuals identifying as two or more races (9.8%). Boise is also notable for its thriving refugee population, with residents from more than 38 different countries in Africa, the Middle East, Central and South America, Europe, and Southeast Asia adding to the city's cultural diversity.

Population by Race	2018	2022	5-Year Change
White	201,557	194,577	-3.46%
Black/African American	6,267	2,736	-56.34%
American Indian/Alaska Native	1,198	1,266	5.68%
Asian	8,698	7,214	-17.06%
Hispanic or Latino	21,300	22,300	4.69%
Native Hawaii/Pacific Islander	421	617	46.56%
Other	4,181	7,027	68.07%
Population of Two or More Races	6,485	23,285	259.06%

Source: 2018-2022 American Community Survey

Estimated Percent of People who were White by Census tract from 2018-2022

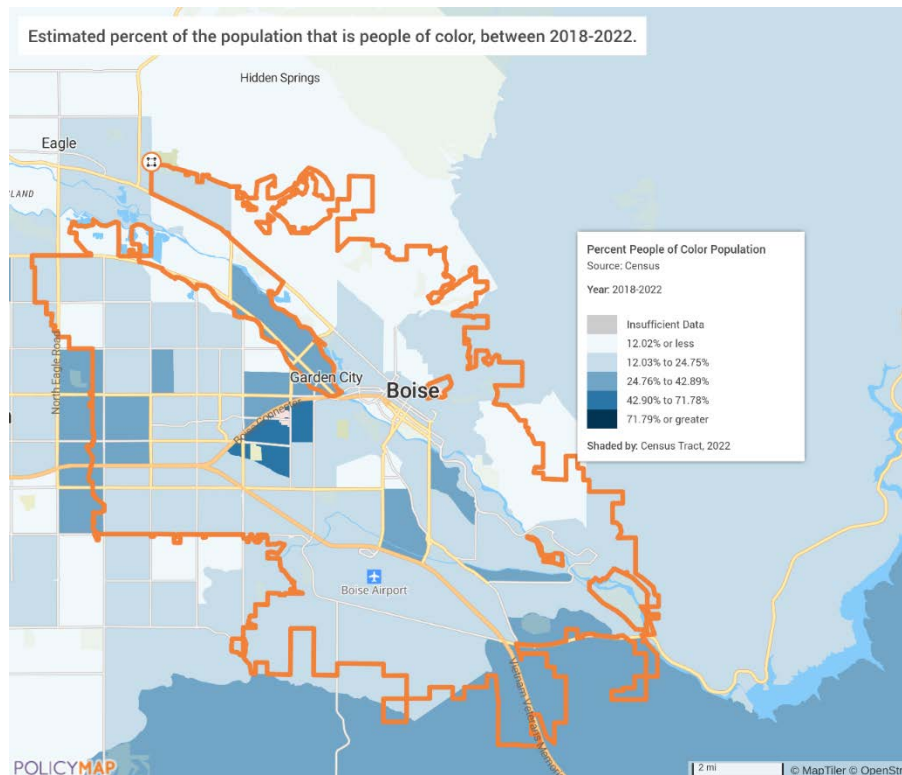


Source: 2018-2022 American Community Survey

Racially and Ethnically Concentrated Areas of Poverty (RCAP/ECAP)

The HUD definition of RCAP/ECAP involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. Neighborhoods of extreme poverty are defined as census tracts with 40 percent or more of individuals living at or below the poverty line.

Estimated percent of the population that is people of color from 2018-2022



Source: 2018-2022 American Community Survey

The areas of potential Racial/Ethnic concentration are in Liberty Park, Morris Hill, and the northern section of Borah. These areas have a concentration of 42.90 to 71.78%. Boise does not have any census tracts designated as Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) according to the HUD criteria.⁷

The poverty rate in Boise is 9.4%, which is 0.8% higher than the poverty rate in Ada County but 3.1% lower than the national poverty rate.

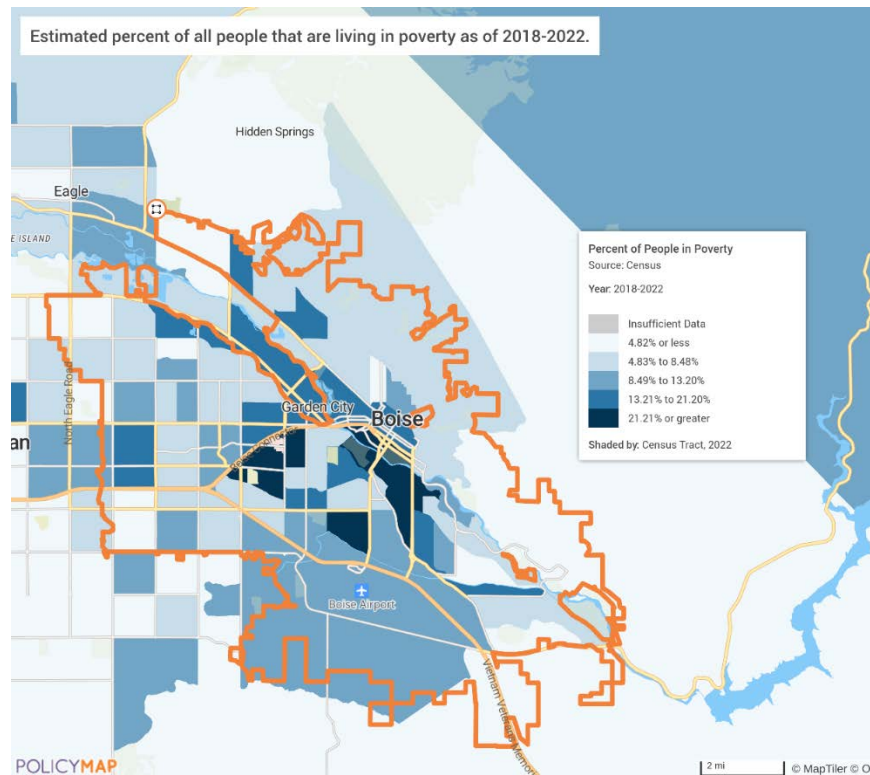
Poverty Rate		
Boise	Ada County	National
9.4%	8.8%	12.5%

Source: 2022 American Community Survey

The areas with the largest concentrations of people in poverty are Liberty Park, Morris Hill, and the northern section of Borah (which were the potential racial/ethnic concentrations), the northeast section of Vista, the southwest portion of Downtown, and a small section of the East End. While these are the areas with the largest percentage of people living in poverty, it is unknown if the percentage meets the threshold of 40% percent or more of individuals living at or below the poverty line.

⁷ <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::racially-or-ethnically-concentrated-areas-of-poverty-r-ecaps/explore>

Estimated Percent of People that are Living in Poverty, between 2018-2022



Source: 2018-2022 American Community Survey

Disability

The disability rate in Boise, Idaho, has shown some fluctuations over recent years. According to the latest data from the American Community Survey, the percentage of people with disabilities in Boise has seen a slight increase. In 2020, Boise had a reported disability rate of about 9.1% for individuals under the age of 65. This is low compared to the national average, which was 12.6%.⁸

Disability Type	2018-2022
Estimated percent of people who have hearing difficulty	3.6%
Estimated percent of people who have an ambulatory difficulty	4.7%
Estimated percent of people who have a cognitive difficulty	5.1%
Estimated percent of people with an independent living difficulty	5.0%
Estimated percent of people with a self-care difficulty	2.2%

Source: 2018-2022 American Community Survey

Employment

Boise offers a diverse range of employment opportunities across various industries. The key sectors are technology, healthcare, education, retail and hospitality, government

⁸ <https://www.census.gov/library/stories/2023/06/disability-rates>

and public services, finance and insurance, manufacturing, and construction. Some of the largest employers include Micron Technology, Albertsons, and the State of Idaho.

Employer	Number of Employees
Micron Technology	31,400
Albertsons	27,300
State of Idaho	26,100
St Luke's Health Systems	12,825
WinCo Foods	12,000
Boise Cascade	6,400
Employers Resource	4,234
Boise State University	3,652
Trus Joist Corp	3,000
J.R. Simplot	2,980
MWI Animal Health	2,121

Source: [2023 Build Idaho](#)

Boise's job market has seen notable shifts in recent years. Management, business, and financial occupations have expanded due to the growth of businesses and the influx of new companies in Boise. The technology sector in Boise has been booming, driving demand for computer, engineering, and science occupations. With the expansion of healthcare facilities there has been a significant increase in jobs for registered nurses, medical technicians, and healthcare administrators.

While there is growth in some occupations, some are experiencing significant decline. Food preparation and service occupations have seen a decline, possibly due to the impact of the COVID-19 pandemic, which led to temporary closures and reduced operations in the hospitality sector. Personal care and service occupations also experienced declines, due to pandemic-related disruptions⁹ and changing consumer behaviors. These trends reflect broader economic shifts and the evolving needs of Boise's growing population.

⁹ <https://www.bls.gov/opub/btn/volume-11/recovering-from-the-pandemic-a-bright-outlook-for-the-personal-care-service-industry.htm>

Sector	2018	2022	5-Year Change
Management, business, and financial occupations	19,249	24,643	28.0%
Computer, engineering, and science occupations	10,430	14,746	41.4%
Educations, legal, community service, arts, and media occupations	16,187	17,912	10.7%
Healthcare practitioners and technicians	8,653	10,629	22.8%
Healthcare support occupations	2,755	3,522	27.8%
Protective service occupations	1,425	1,673	17.4%
Food preparation and serving related occupations	8,935	6,109	-31.6%
Building and grounds cleaning and maintenance occupations	4,620	4,769	3.2%
Personal care and service occupations	3,581	2,423	-32.3%
Sales, office, and administrative occupations	25,756	25,739	-0.1%
Natural resources, construction, and maintenance occupations	9,398	10,893	15.9%
Production, transportation, and material moving occupations	9,984	8,723	-12.6%

Source: 2018-2022 American Community Survey

Housing Profile

Housing Needs Assessment

According to the American Community Survey, Boise grew 3.42% between 2018 and 2022. The average number of households increased by 1.95% while the household size decreased by over 20%. In the same period, the housing stock grew at a rate of 1%.

Despite the increase in housing stock, focus group and community meeting participants perceived that the new demand and potential higher out-of-state salaries of new residents fueled the rise in housing costs. Based on the American Community Survey, the median home value increased by 74.8% to \$410,400, and the median monthly rental cost increased by 38.5% to \$1,284. Boise's most pressing housing issues are the lack of affordable housing options and the cost burden faced by residents. 18.8% of households in owner-occupied units and 44.7% of households in renter-occupied units reported spending 30% or more of their monthly income on housing costs.

Measure	2018	2022	5-Year Change
Population	228,807	236,632	3.42%
Number of Households	97,101	98,992	1.95%
Household size	2.96	2.32	-21.62%
Housing Stock	102,201	104,665	1%

Source: 2018-2022 American Community Survey

Number of Housing Units

According to the 2022 ACS Census Data, Boise had a housing stock of 104,665 units. The majority (73.2%) of the City's housing stock was comprised of single-family units. Large multifamily complexes comprised of 10 or more units were the second most common housing type at 11.8% of the housing stock. Among the City's occupied housing units, 65.8% were occupied by owners and 34.2% by renters.

Of the 104,665 units of housing stock in Boise, 98,992 units were occupied. There were 5,673 units that were vacant. There were 65,167 owner-occupied units which makes up 64.8% of occupied units. The 33,825 renter-occupied units make up the remaining 34.2% of units. The vacancy rate for owner-occupied units was 1% while the vacancy rate for renter-occupied units was 4.9%. For owner-occupied units, single-family units (detached and attached) accounted for 92.8% of the households. For renter-occupied units, single-family units (detached and attached) accounted for 36.2% followed by larger multifamily units (10+) which accounted for 31.4% of households. Single-family units (detached and attached) accounted for the vast majority (77.8%) of housing in Boise.

Property Type	Owner-Occupied		Renter-Occupied		Total	
	#	%	#	%	#	%
Single-family detached	56,897	87.3%	9,779	28.9%	66,676	72.2%
Single-family attached	3,598	5.5%	2,485	7.3%	6,083	5.6%
2 units	572	0.9%	2,056	6.1%	2,628	2.0%
3 or 4 units	303	0.5%	5,142	15.2%	5,445	5.5%
5 to 9 units	177	0.3%	2,733	8.1%	2,910	3.1%
10 or more units	809	1.2%	10,634	31.4%	11,443	9.0%
Mobile home or other type	2,811	4.3%	996	2.9%	3,807	2.6%
Total	65,167	100%	33,825	100%	98,992	100%

Source: 2022 American Community Survey

The bulk of the housing stock for both owner-occupied and renter-occupied properties was concentrated in 2–3-bedroom units. These units represented 65.9% and 68.2% of owner-occupied and renter-occupied units, respectively. In total, the 2–3-bedroom units made up 63.3% of occupied units. Four-bedroom units followed with 28.4% of total stock. Four-bedroom units held a significantly higher percentage of owner-occupied units (32.3%) as compared to renter-occupied units (7.8%).

Bedrooms	Owner-Occupied		Renter-Occupied		Total	
	#	%	#	%	#	%
0-bedroom	148	0.2%	1,946	4.9%	2,094	1.6%
1-bedroom	1,069	1.6%	7,905	19.1%	8,974	6.7%
2 or 3-bedroom	42,931	65.9%	22,057	68.2%	64,988	63.3%
4 or more bedrooms	21,019	32.3%	1,917	7.8%	22,936	28.4%
Total	65,167	100%	33,825	100%	98,992	100%

Source: 2022 American Community Survey

Housing Affordability & Condition

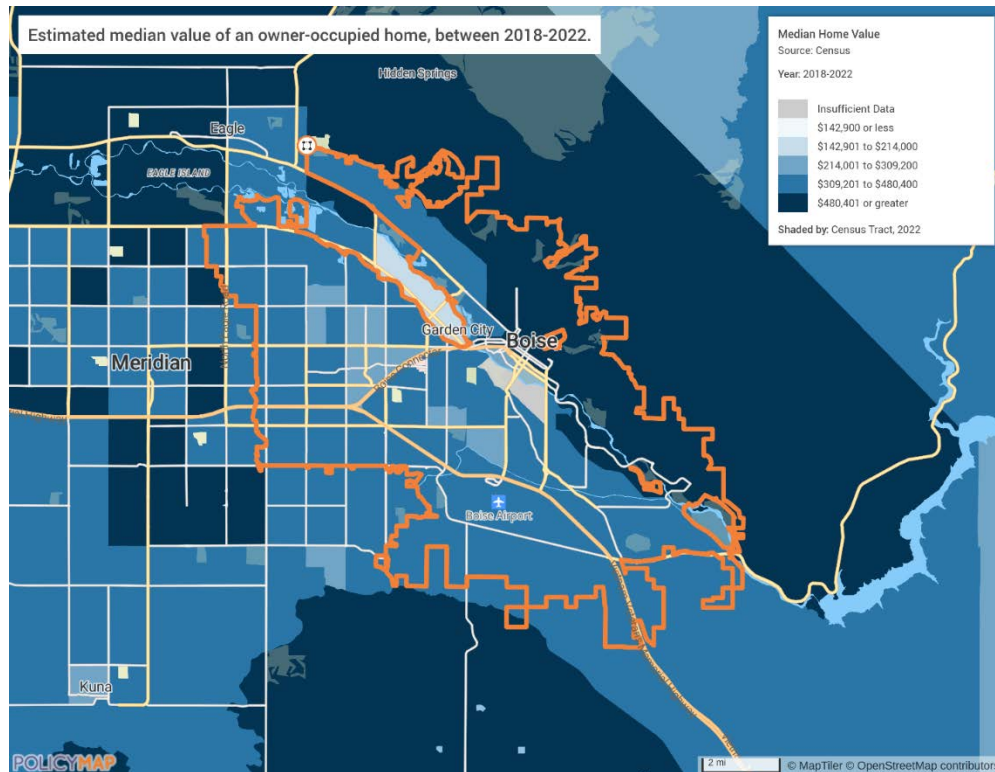
While analyzing the housing market within a community, it is important to focus on the cost of housing. Housing costs account for a household's single largest expense across the nation. This statistic is no different in the City of Boise.

The cost of homeownership in Boise has increased significantly over a recent five-year span. In 2018, the median home value in Boise was \$234,800 according to the Census. As of 2022, this value has skyrocketed 112.58% to \$499,000. The percentage of individuals owning homes valued over \$500,000 increased from 6.2% to 49.7% of the homeowner population.

Home Value	2018	2022	5-Year Change
Less than \$50,000	3.7%	2.4%	-1.3%
\$50,000 to \$99,999	2.2%	1.2%	-1.0%
\$100,000 to \$149,999	10.3%	1.9%	-8.4%
\$150,000 to \$199,999	20.5%	2.1%	-18.4%
\$200,000 to \$299,999	33.3%	3.7%	-29.6%
\$300,000 to \$499,999	23.9%	39.0%	15.1%
\$500,000 to \$999,999	5.4%	41.2%	35.8%
\$1,000,000 or more	0.8%	8.5%	7.7%
Median Home Value	\$234,800	\$499,000	112.5%

Source: 2022 American Community Survey

Housing Value (Owner Occupied)



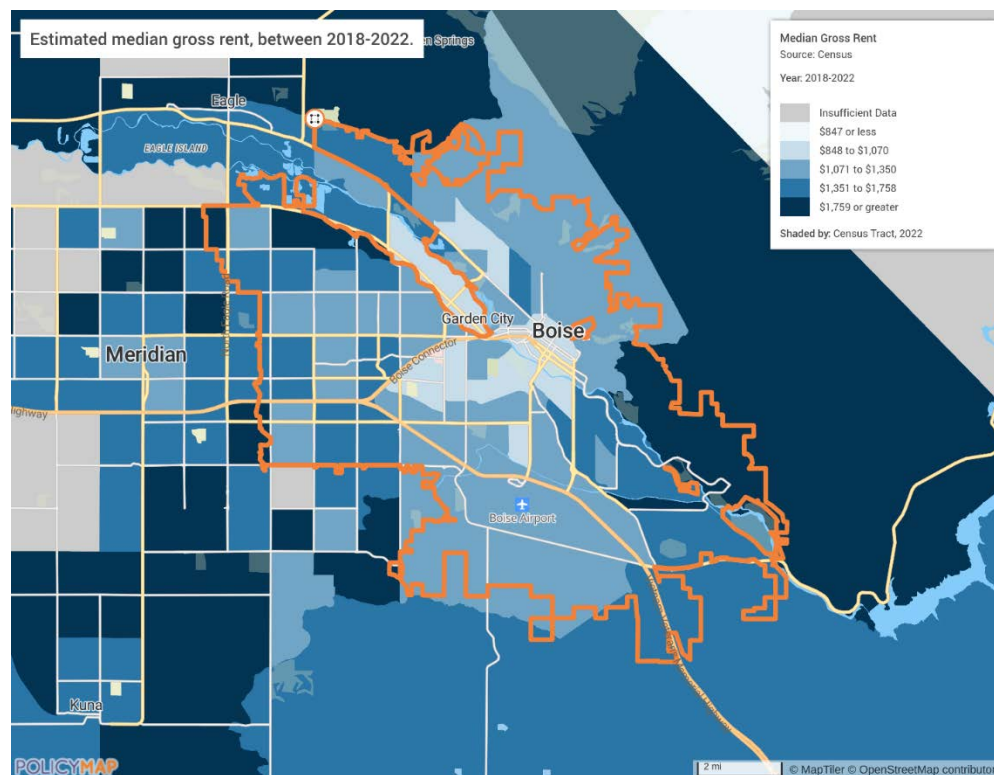
Source: 2018-2022 American Community Survey

Median rents in Boise have also noticeably increased. In 2018, the median monthly rental cost across units of all types was \$927. As of 2022, the median monthly rental cost rose to \$1,360, a 38.5% increase. Affordable rental options significantly decreased during this period. Previously, 52.9% of the renter population had a median monthly rental cost between \$500 and \$999. By 2022 this percentage shrank to 19.4% of the renter population.

Occupied Units Paying Rent	2018	2022	% Change
Median Monthly Rental Cost	\$927	\$1,360	38.5%
Less than \$500	6.8%	4.6%	- 3.4 %
\$500 to \$999	52.9%	19.4%	- 32.3%
\$1,000 to \$1,499	31.9%	36.9%	9.9 %
\$1,500 to \$1,999	6.2%	21.5%	17.9 %
\$2,000 to \$2,499	1.4%	13.9%	5.7 %
\$2,500 to \$2,999	0.4%	2.1%	1.0 %
\$3,000 or more	0.5%	1.7%	1.1 %

Source: 2018-2022 American Community Survey

Median Gross Rent



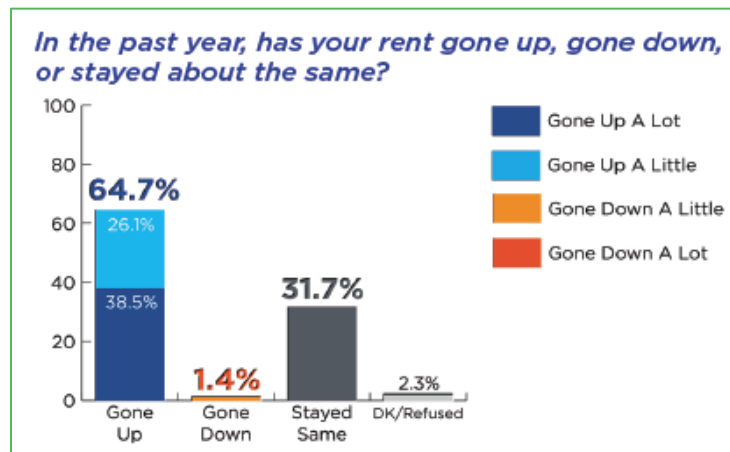
Source: 2018-2022 American Community Survey

Idaho's growth has impacted its housing markets, based on the Eighth Annual Idaho Public Policy Survey.¹⁰ Previous years of this survey have shown increasing concern

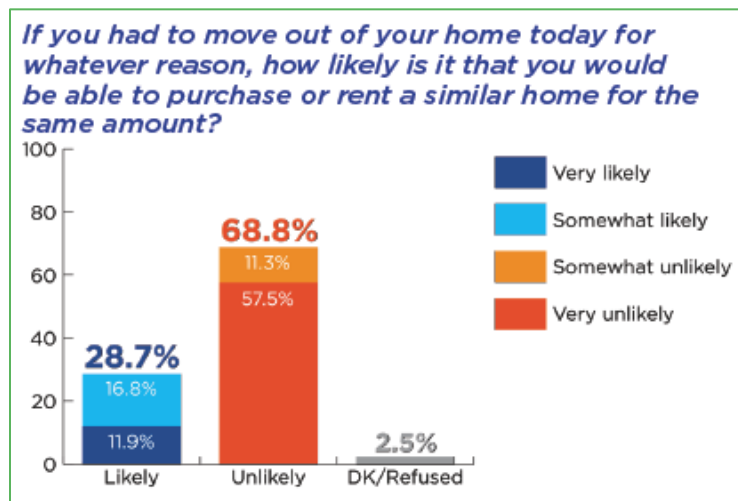
¹⁰ www.boisestate.edu/wp-content/uploads/sites/137/2023/01/8th-Annual-Survey-Tagged.pdf

among Idaho residents about housing and affordability, and while the 2022 results show some improvement, that concern is still evident. Among renters, many have experienced rising costs, with most reporting that their rent had gone up over the last year. Approximately one-third of renters reported that their rents had stayed the same or gone down. Ada County was the most impacted area of the state.

The report found that homeowners are experiencing the impacts of decreasing housing affordability as well. Most current homeowners believed that if they moved out of their homes today it was unlikely they would find a comparable home at a comparable price. Less than one third of the respondents believed that they would be very or somewhat likely able to buy or rent a similar home at a comparable price.



Source: Eighth Annual Idaho Public Policy Survey



Source: Eighth Annual Idaho Public Policy Survey

Despite these dramatic increases in median monthly rental cost and home value, costs as a percentage of household income remained consistent and the percentage of cost-burdened individuals even saw slight decreases. For owners, the percentage of individuals whose gross owner costs accounted for 30% or more of their monthly income decreased slightly from 23.8% to 22.4%.

For renters, this percentage increased slightly from 46.6% to 46.8%. Even with rising costs of housing, homeownership in Boise increased slightly from 65.7% to 68.6%.

Housing Occupancy	2018	2022
Owner Occupied	65.7%	68.6%
Renter Occupied	34.3%	31.4%

Source: 2018-2022 American Community Survey

Rent as a % of Household (HH) Income	2018	2022
Less than 15%	12.8%	11.5%
15.0% to 19.9%	15.7%	14.6%
20.0% to 24.9%	12.5%	15.0%
25.0% to 29.9%	12.4%	12.1%
30.0% to 34.9%	6.8%	10.1%
35.0% or more	39.8%	36.7%

Source: 2018-2022 American Community Survey

Monthly Owners Costs as a % of HH Income	2018	2022
Less than 20%	49.6%	51.4%
20.0% to 24.9%	15.3%	16.0%
25.0% to 29.9%	11.3%	9.3%
30.0% to 34.9%	5.8%	6.5%
35.0% or more	18.0%	15.9%

Source: 2018-2022 American Community Survey

This phenomenon may be explained by the wave of residents moving to Boise from higher-cost states¹¹. Often, these new residents bring higher salaries, reflected in the increase of median income from \$60,418 in 2018 to \$80,707 in 2022. This, in turn, drives up demand for housing and further increases the cost. While these prices may be affordable for some new residents, community feedback suggests that long-time residents of Boise have not seen similar increases in wages and are now faced with escalating disparities. However, this impact on existing residents is not accurately reflected in the data as new and existing residents act as confounding variables, washing away the statistical significance of increasing cost burden.

Condition of Housing

The American Community Survey defines the quality and conditions of the local housing stock through four key metrics: 1) lacking complete plumbing facilities; 2) lacking complete kitchen facilities; 3) overcrowding/more than 1.51 occupants per room; and 4) selected monthly housing costs greater than 30% of household income.

For owner-occupied housing units, 18.9% of households reported experiencing at least one of these four housing problems. This statistic increases drastically for renter-occupied units, with 44.9% of households reporting experiencing at least one of these four problems.

¹¹ <https://www.ncesc.com/geographic-faq/why-does-everyone-want-to-move-to-boise/>

Over 98.0% of owner and renter-occupied units reported having complete plumbing and kitchen facilities. Additionally, only 1.0% of renter-occupied and 0.3% of owner-occupied units report overcrowding.

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Household has at least 1 of 4 housing problems	19,265	18.9%	21,250	44.9%
Household has none of 4 housing problems	82,460	81.1%	26,090	55.1%
Total	101,725	100%	47,340	100%

Source: 2017-2021 CHAS Data

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With complete plumbing	104,290	99.5%	47,939	99.8%
With complete kitchen facilities	104,328	99.5%	47,101	98.0%
Overcrowding 1.51 or more occupants/room	267	.3%	462	1.0%
Cost burden 30%	19,753	18.8%	21,458	44.7%

Source: 2022 American Community Survey

Overcrowding is not a significant issue in Boise. The data shows that 98.7% of occupied rooms housed 1.00 or less residents. The instance of overcrowding (1.51 or more occupants per room) is 0.7%. This is consistent with feedback that Boise residents shared during the public outreach phase of this study.

Overcrowding		
Occupants per room	# of Occupied Rooms	%
1.00 or less	97,693	98.7%
1.01 to 1.50	578	0.6%
1.51 or more	721	0.7%
Total	98,992	100.0%

Source: 2022 American Community Survey

In Boise, the occurrence of cost-burdened households is greater for renters than for homeowners. Approximately half of renter households (50.3%) in Boise are cost-burdened, meaning they spend more than 30% of their income on rent and other housing-related expenses. While homeowners also face cost burdens, the percentage is lower (23.4%) compared to renters.

Monthly Housing Cost as a percentage of household income	Owner Cost	Gross Rent
Less than 20%	53.0%	19.6%
20.0 to 24.9%	16.4%	17.6%
25.0 to 29.9%	7.2%	12.5%
30.0 to 34.9%	6.1%	10.7%
35.0% or more	17.3%	39.6%
Total	100.0%	100.0%

Source: 2022 American Community Survey

Homeownership

In Boise, the rates of homeownership vary significantly across neighborhoods. The areas with the highest rates of homeownership include the North End, the Foothills, Southeast Boise, areas close to Boise State University, and Barber Valley. The West Bench has a balanced mix of renters and homeowners. West Valley contains a considerable number of rental properties, and Borah also has a lower rate of homeownership and a mix of rental properties.¹²

The distribution of renter-occupied and owner-occupied housing units varies by race and ethnicity. For White residents, the renter-occupied rates are decreasing while the percentage of owner-occupied units is increasing. Hispanic or Latino residents occupy a sizable portion of renter-occupied units, with a smaller percentage in owner-occupied units. For Hispanic or Latino residents, there is a significant increase in renter-occupied units and a significant decrease in owner-occupied units.

For Black or African American residents, the percentage of renter-occupied units decreased while the percentage of owner-occupied units increased. Increasingly, Asian residents occupy more renter-occupied units, while the percentage of owner-occupied units slightly decreased.

2018	Rent	Own	Total Units
# of Units	46,861	89,793	136,654

Source: 2018 American Community Survey

¹² <https://bestneighborhood.org/housing-data-in-boise-id/>

Race	Renter-Occupied Units	Owner-Occupied Units	% Rent	% Own
White	41,182	95,397	30.15%	69.85%
Black or African American	795	627	55.91%	44.09%
American Indian and Alaska Native	397	494	44.56%	55.44%
Asian	1,303	2,161	37.62%	62.38%
Native Hawaiian and Other Pacific Islander	161	48	77.03%	22.97%
Some Other Race	1,402	1,434	49.44%	50.56%
Two or More Races	2,814	4,639	37.76%	62.24%
Hispanic or Latino Origin	4,705	5,868	44.50%	55.50%

Source: 2018 American Community Survey

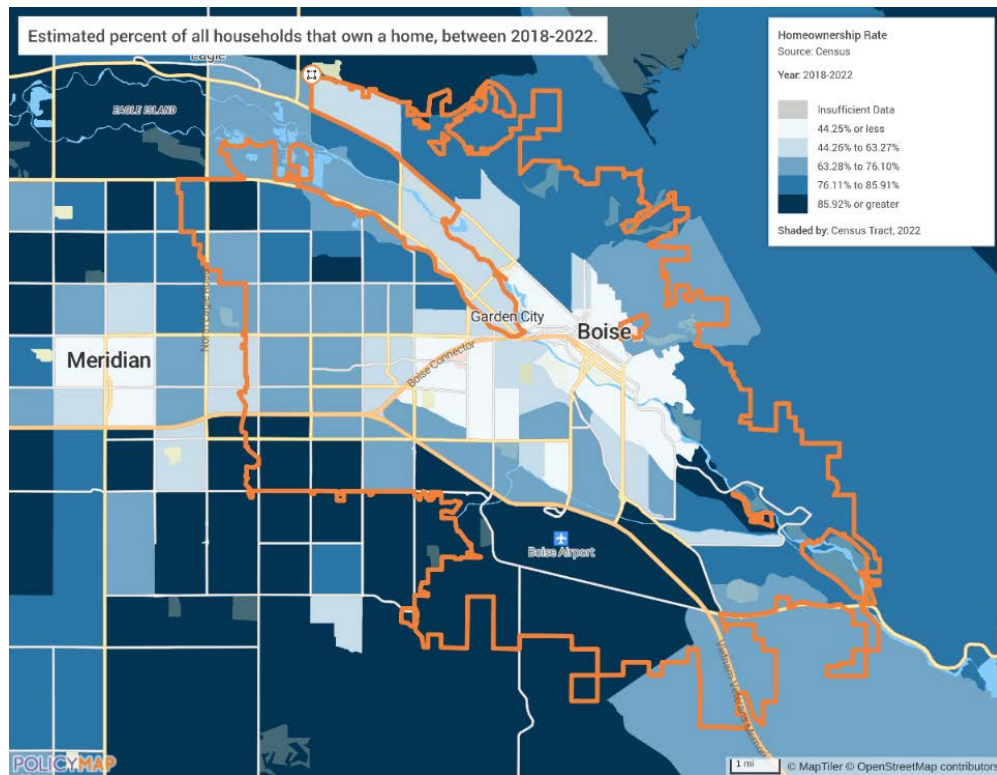
2022	Rent	Own	Total Units
# of Units	48,054	104,800	152,854

Source: 2022 American Community Survey

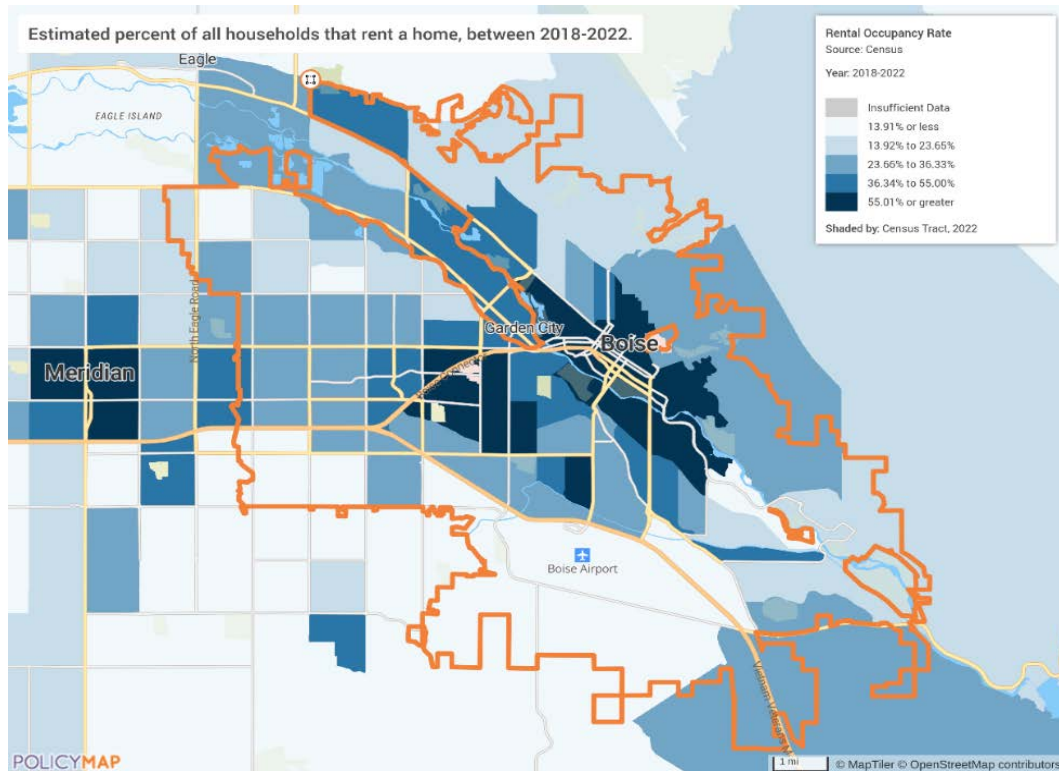
Race	Renter-Occupied Units	Owner-Occupied Units	% Rent	% Own
White	42,074	84,366	33.28%	66.72%
Black or African American	937	564	62.43%	37.57%
American Indian and Alaska Native	496	379	56.69%	43.31%
Asian	872	2,147	28.88%	71.12%
Native Hawaiian and Other Pacific Islander	229	111	67.35%	32.65%
Some Other Race	894	887	50.20%	49.80%
Two or More Races	1,359	1,339	50.37%	49.63%
Hispanic or Latino Origin	4,928	3,395	59.21%	40.79%

Source: 2022 American Community Survey

Estimated Percent of Households that Own a Home, 2018-2022



Estimated Percent of Households that Rent, 2018-2022



Source: 2018-2022 American Community Survey (ACS)

Housing Support

The City of Boise offers a variety of housing and neighborhood programs aimed at supporting residents and enhancing community livability.¹³

- **A Home for Everyone:** This initiative addresses housing needs across the community, ensuring that there is a home for every resident, at every budget.
- **Rental Housing Program:** The City owns and manages a portfolio of rental housing units for income-qualified residents, including apartments and single-family homes.
- **Our Path Home:** A public-private partnership focused on ending homelessness in Ada County.
- **HUD Funding and Resources:** Programs funded by the Department of Housing and Urban Development to support affordable housing through the Home Improvement Program, Homeownership Opportunity Program, affordable housing development assistance, and other funding opportunities.
- **Housing Land Trust:** This program leverages City-owned property to create affordable housing for residents.

The Boise City/Ada County Housing Authorities (BCACHA) offer a variety of programs to assist residents with affordable housing needs.¹⁴

- **Public Housing:** Provides safe and affordable rental housing for eligible low-income families, the elderly, and persons with disabilities. Rent is typically based on 30% of a household's monthly income.
- **Housing Choice Voucher (Section 8):** This program helps low-income families, the elderly, and disabled individuals afford decent, safe, and sanitary housing in the private market. Participants receive a voucher to help cover the cost of rent.
- **Project-Based Vouchers:** This program is like the Housing Choice Voucher program, but assistance is tied to specific housing units rather than being portable.
- **Family Self-Sufficiency (FSS) Program:** This is designed to help families in the Housing Choice Voucher program achieve economic independence. Participants work with case managers to set and achieve goals such as employment, education, and homeownership.
- **Veterans Affairs Supportive Housing (VASH):** This program combines Housing Choice Voucher rental assistance with case management and clinical services provided by the Department of Veterans Affairs for homeless veterans.

In addition, there are several other organizations that provide housing related support.

- **Public Agencies:** In addition to the Boise City/Ada County Housing Authority (BCACHA), other public agencies like the Idaho Housing and Finance Association (IHFA) and Ada County offer various services to support lower income residents. These agencies work together to ensure that residents have access to safe and affordable housing options.
- **Non-Profit Agencies:** In Boise, several non-profit agencies provide essential services to support individuals and families facing housing challenges. These

¹³ <https://www.cityofboise.org/programs/housing/>

¹⁴ <https://bcacha.org/programs/>

services include rapid rehousing, case management, housing navigation eviction prevention, mediation, emergency shelter, and transitional housing. These organizations work to help residents access the support they need to secure and maintain stable housing.

- **Advocacy agencies:** In Boise, the Intermountain Fair Housing Council (IFHC) and Idaho Legal Aid Services, Inc. provide education on fair housing laws, housing counseling, and assist with various housing-related issues including evictions, mediation, fair housing rights, homeowner rights, and filing fair housing complaints. These advocacy agencies work to protect the rights of tenants and homeowners, providing essential support and advocacy.

Fair Housing Legal Landscape

The Fair Housing Act of 1968 prohibits discrimination on housing based on race, color, religion, sex, familial status, and national origin. A Supreme Court ruling determined sexual orientation and gender identity are included protections under sex.

The national fair housing legal landscape saw several key developments from 1996 to 2017 regarding the Analysis of Impediments (AI). In 1996, the Analysis of Impediments to Fair Housing Choice (AI) became a crucial part of fair housing planning. Jurisdictions receiving HUD funding were required to conduct an AI to identify barriers to fair housing and take appropriate actions to address them.

In 2015, HUD introduced the Affirmatively Furthering Fair Housing (AFFH) Rule. This rule aimed to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination. This guidance requires program participants to submit certifications that they will affirmatively further fair housing in connection with their consolidated plans, annual action plans, and public housing agency plans. In 2017, the Fair and Equal Housing Act of 2017 was introduced to extend existing prohibitions to include protections against discrimination based on sexual orientation and gender identity.

State and Local Fair Housing Laws

The Idaho Fair Housing Law was enacted in 1969. The Idaho Human Rights Commission is tasked with enforcing the state's fair housing laws, which prohibit discrimination based on race, color, national origin, religion, disability, and sex. This statute does not specifically prohibit discrimination based on sexual orientation, gender identity, or familial status. However, in 2012, the City of Boise approved Ordinance 36-12¹⁵ which specifically prohibits the denial to or discrimination against any person because of sexual orientation and/or gender identity/expression in the sale, purchase, lease, or rental of any housing accommodation, or to otherwise discriminate in the terms and conditions, maintenance, improvement, or repair of any housing accommodation. Further, in 2023, Ordinance 37-23 was approved, which added prohibitions against discrimination based on a person's source of income¹⁶.

¹⁵ <https://boisecityid.iqm2.com/Citizens/FileOpen.aspx?Type=15&ID=1639&Inline=True>

¹⁶ https://boisecityid.iqm2.com/Citizens/Detail_LegiFile.aspx?ID=20906&highlightTerms=ord-37-23

Barriers to Affordable Housing

According to the Sightline Institute, developers and architects in Boise cite four main barriers to providing more housing: elevated interest rates, high building costs, new zoning codes, and financing availability.

- **Elevated Interest Rates:** From 2018 to 2022, the federal interest rate has increased from 2.27% to 4.10%. These elevated rates are making it more difficult and expensive for developers to secure financing.
- **High Building Costs:** Not only are higher interest rates driving up the costs of construction loans, the costs of materials and labor are also increasing. According to Coldwell Banker Richard Ellis (CBRE), the cost of construction increased by 14.1% in 2022 and is expected to increase by 2-4% year over year in upcoming years. Currently, the market is facing numerous supply chain disruptions and a global labor shortage leading to this drastic increase in costs. Additionally, high construction demand allows contractors to raise rates.
- **Zoning and Regulatory Changes:** The City adopted a new zoning code, effective December 1, 2023. Changes in approval bodies, design standards, and allowed uses have required significant shifts in workflows, affecting the predictability for developers. Efforts to streamline processes and provide educational resources for developers are ongoing.
- **Financing Availability:** Based on the Housing Needs Assessment, as of 2020 the gap financing needed to build a unit at 60% AMI is up to \$115,000 per unit¹⁷. This financial gap made it difficult for developers to pursue affordable housing projects without substantial subsidies or incentive.

Assessment of Public & Private Fair Housing Programs & Activities

Identification of Impediments to Fair Housing Choice

The 2022 State of Idaho Analysis of Impediments¹⁸ found that housing needs disproportionately affect persons with disabilities and African American, Native-American, and Hispanic communities and that “Idaho statutes continue to be silent in many areas that affect residential development; local governments primarily adopt these regulations.”

The 2021 Regional Analysis of Impediments for the cities of Boise, Caldwell, Meridian, and Nampa identified ten (10) impediments:

- 1) Discrimination
- 2) Increased home and rental price
- 3) Neighborhood resistance to multi-family housing
- 4) Limited locations and programs for rapid re-housing
- 5) Lack of transportation options and access
- 6) The public perception that affordable housing areas are unsafe
- 7) Lack of trust/belief that reporting discrimination will result in action
- 8) The differences in land use policies limits where people can live and work
- 9) Lack of accessible housing for the disabled population
- 10) Lack of accessible communication methods for non-English speakers

¹⁷ <https://www.cityofboise.org/programs/housing/housing-needs-analysis/>

¹⁸ <https://www.idahohousing.com/documents/state-of-idaho-analysis-of-impediments-2022>

Previously identified impediments specifically within the City of Boise include:

- 1) Discrimination
- 2) Lack of knowledge about fair housing roles and responsibilities of consumers and providers
- 3) Language barriers
- 4) Lack of compliance with fair housing laws
- 5) Increased cost of rental and for sale housing
- 6) Neighborhood resistance to affordable housing development
- 7) Regulatory and economic factors which limit housing choice

Public Sector Activities

- 1) Public Transportation: Limited access to public and non-motorized transportation can make it difficult for low-income residents to reach jobs and services, impacting their housing choices.
- 2) Enforcement of Fair Housing Laws: Inadequate enforcement of fair housing laws can allow discriminatory practices to persist, affecting the ability of protected classes to secure housing.
- 3) Availability of Affordable Housing: Insufficient public investment in affordable housing can lead to a shortage of vacant units, particularly for low-income families.

Private Sector Activities

Impediments to fair housing are created when lenders do not abide by:

- 1) The Fair Housing Act which protects everyone who attempts to purchase, rent, or secure financing for a home regardless of citizenship status, race, color, national origin, religion, sex, or disability.
- 2) The Equal Credit Opportunities Act which focuses on credit and states that lenders should not discriminate against anyone seeking financing and should only consider the individual's ability to repay the loan.
- 3) The Home Mortgage Disclosure Act which requires many financial institutions to maintain, report, and publicly disclose loan-level information about mortgages.

Based on the Consumer Financial Protection Bureau Home Mortgage Disclosure Act data, there were 60,490 mortgage applications submitted. Of these applications, 9,122 were denied. The denial rate for the City of Boise is 15.1%. The denial rate for American Indian or Alaska Native, Black, or African American, and Native Hawaiian or Other Pacific Islanders was the highest, reaching 26%. The groups with the lowest denial rates were Asian, White, and Not Hispanic or Latino. The denial rates for these groups ranged from 14.5%-14.9%.

Mortgage Application and Denial Rates by Race	Loan Applications	Loan Applications Denied	Denial %
American Indian or Alaska Native	206	54	26.2%
Asian	655	95	14.5%
Black or African American	203	54	26.6%
Native Hawaiian or Other Pacific Islander	87	23	26.4%
White	23,433	3,495	14.9%
2 or more minority races	24	2	8.3%
Race Not Available	5,801	855	14.7%
Hispanic or Latino	2,449	536	21.9%
Not Hispanic or Latino	22,035	3,245	14.7%
Ethnicity Not Available	5,597	763	13.6%
Total	60,490	9,122	15.1%

Source: 2023 Home Mortgage Disclosure Act Data

Mortgage denial rates can vary significantly based on income levels. In Boise, lower-income applicants often face higher denial rates. Middle-income applicants have lower denial rates compared to lower-income applicants but may still face challenges if they have high debt levels or insufficient savings for down payments. Higher-income applicants typically have the lowest denial rates. They often have better credit scores, more substantial savings, and more stable employment, making them more attractive to lenders.

In Boise in 2023, the denial rate for those earning anything less than 80% of median income was 53.2%. Those at lower median incomes (under 50% AMI) experienced higher percentages of denials. Those earning 80-99% of the median income and 100-119% of the median income were denied at lower but similar rates, which were 13% and 12.7%, respectively. Those earning 120+% of the median income were denied 10.6% of the time.

Mortgage Application and Denial Rates by Median Income	Loan Applications	Loan Applications Denied	Denial %
Less than 50% of MSA median income	5,554	1,934	34.8%
50-79% of MSA median income	12,401	2,287	18.4%
80-99% of MSA median income	9,364	1,214	13.0%
100-119% of MSA median income	7,514	958	12.7%
120% or more of MSA median income	25,657	2,729	10.6%
Total	60490	9122	15.1%

Source: 2023 Home Mortgage Disclosure Act Data

Fair Housing Complaints

Fair housing complaints in Boise can be filed through several channels, addressing issues such as discrimination based on race, color, national origin, religion, sex, familial status, or disability.

- 1) The City of Boise provides resources and guidance on fair housing rights and how to file a complaint.

- 2) The Intermountain Fair Housing Council accepts and helps file complaints and provides education on fair housing laws.
- 3) Idaho Legal Aid Services offers detailed instructions on how to file a fair housing complaint, including the necessary documentation and the process involved.
- 4) Idaho Housing and Finance Association offers a variety of services including resources and support to ensure fair housing practices are followed and educates individuals about their rights under fair housing laws.
- 5) Complaints can be directly filed with HUD, which investigates and enforces fair housing laws.

Recent Fair Housing Complaints in Boise

Based on data gathered by the Intermountain Fair Housing Council, in 2023, there were 279 fair housing cases reported in the City of Boise. Most of the cases (208) were related to rental/eviction discrimination. Of the remaining cases, 52 involved issues with housing transactions, five (5) were related to Homeowner Association (HOA) issues, five (5) were related to home sales, five (5) were related to unfair lending practices, three (3) were related to appraisal valuations, and one (1) was related to insurance.

Of the complaints in 2023, 103 involved disability, 27 involved race, 38 involved national origin, 10 involved color, 26 involved sex/gender, six (6) involved gender identity, 34 involved familial status, two (2) were based on religion, and nine (9) involved sexual orientation. In addition, there were non-Fair Housing Act claims. The majority of these (104) were based on source of income/other, five (5) involved veteran status, and five (5) were related to age.

In 2024, there were 200 fair housing cases reported in the City of Boise. Most of the cases (165) were related to rental/eviction discrimination. Of the remaining cases, four (4) were related to Homeowner Association (HOA) issues, two (2) were sales discrimination cases, one (1) was related to unfair lending practices, two (2) were related disability and civil rights, and 26 cases were related to “other” issues not defined above.

Of the complaints in 2024, 78 involved disability, 17 involved race, 24 involved national origin, (three) 3 involved color, 18 involved sex/gender, four (4) involved gender identity, 10 involved familial status, seven (7) involved religion, three (3) involved sexual orientation. In addition, there were non-Fair Housing Act claims. The majority of these (69) were based on source of income/other, five (5) involved veteran status, and two (2) were related to age. There was one (1) administrative complaint filed with HUD against the City of Boise (Hardey v. City of Boise). This case involved disability in a land use transaction.

Complaint Trends

There are four (4) trend areas in Idaho fair housing complaints.¹⁹

- 1) Disability Discrimination: A sizable number of complaints involve discrimination against individuals with disabilities. These cases often relate to the failure of housing providers to make reasonable accommodations or to meet accessibility standards in design and construction.

¹⁹ <https://fairhousingforum.org/consumers/common-types-of-discrimination-in-idaho/>

- 2) Race and National Origin: Complaints based on race and national origin were reported. These include allegations of discriminatory practices against minority groups, such as differential treatment in renting or selling properties.
- 3) Familial Status: There are instances where families with children face discrimination, such as being denied housing or subjected to different terms and conditions.
- 4) Sexual Orientation and Gender Identity: Complaints related to discrimination based on sexual orientation and gender identity have been reported, reflecting broader societal issues.

IMPEDIMENTS & RECOMMENDATIONS

The City of Boise has been undertaking significant efforts to bolster its “A Home for Everyone”²⁰ approach to address housing needs in the community. The City is committed to doing everything possible to ensure that there is a place to live for every resident, at every budget. Some recent activities that reflect the commitment to housing include adopting a new zoning code to encourage the development of affordable housing and reduce barriers to construction, increased investments in initiatives that address homelessness, support for nonprofits providing eviction prevention and rapid rehousing programs and partnering with developers to create more affordable housing units both on City-owned land and via gap financing investments.

Impediments to Fair Housing Choice are also being addressed by multiple agencies and organizations. The City of Boise and groups like the Intermountain Fair Housing Council, Jesse Tree, Boise City/Ada County Housing Authorities, and Idaho Housing and Finance Association, all play crucial roles in tackling these issues.

Though there are efforts being made to alleviate the housing concerns, there continue to be issues that limit the access to housing in Boise. The primary drivers are availability of affordable housing, personal histories that create barriers, the need for increased communication about the impacts of affordable housing programs, and complexity/lack of transparency of information and processes.

Impediment #1: Lack of Supply of Affordable Housing

The lack of affordable housing is a significant impediment to fair housing in Boise. The median income increased approximately 15% between 2018-2022, according to the American Community Survey. Based on focus group and community engagement feedback, this income growth is driven by:

- 1) Individuals and families relocating to the area because housing values are low relative to their previous location.
- 2) An increase in the demand for skilled workers as existing companies expand and new employers move to the area.

As a result, property owners and sellers are responding to the economic demand and are renting or selling at increased prices. In addition to the housing cost increases, there is a shortage of deed-restricted affordable housing units available to meet the demand.

²⁰ <https://www.cityofboise.org/programs/housing/#HousingPrograms>

Additionally, some tax-credit properties have aged out of their affordability covenants, further reducing the already tight supply of affordable housing.

There are also limited rental assistance programs. The impact of the largest of these programs, Housing Choice Voucher Program (Section 8), is being diminished due to the increasing gap between the Fair Market Value of market housing and the voucher subsidy payment standards, resulting in fewer vouchers being available. The impact of these issues forces many residents to spend a disproportionate amount of their income on housing, leading to financial instability and making it difficult for many residents, especially low- or fixed-income families, to afford housing.

The new zoning code was developed using a “Build-Measure-Learn”²¹ approach. This modern zoning code seeks to increase development by reducing/eliminating parking requirements, allowing more Accessory Dwelling Units (ADUs), permitting tri/fourplexes in areas previously zoned for single-family homes, increasing mixed-use developments, promoting walkability, and reducing traffic congestion. The City will implement a public dashboard to understand the impacts of the new zoning code.

Recommendation

- 1) Continue implementation of the new zoning code.
- 2) Broadly share the information that is being collected on the impact of the new zoning code. This information may include the number of permits issued, number of ADUs built, number of new housing developments, construction cost per unit,²² average time to build, occupancy rate, and City return on investment (ROI). Resident metrics should also be monitored. These may also include a Customer Satisfaction Score, which measures the resident’s satisfaction with the housing and services provided and Housing Stability which measures the duration residents remain in affordable housing, indicating the stability and long-term success of the housing solutions.²³
- 3) Communicate impacts at community engagement events and to fair housing related agencies.
- 4) Conduct Developer Education which includes a summary of the changes in the code, how these changes will increase units, and the impact of zoning changes (from above).

Impediment #2: Prior Criminal Records

Prior criminal records can be an impediment to fair housing choice because housing providers may use criminal background checks as part of their tenant screening process. The Boise City/Ada County Housing Authorities do not use prior arrest records or non-violent and drug-related criminal records for screening, in line with HUD recommendations.²⁴ In addition, the City of Boise does not utilize blanket prohibitions when renting to individuals with criminal records for housing it manages. Instead, the City follows guidelines that promote fair housing practices and ensure compliance with

²¹ <https://www.cityofboise.org/programs/innovation-plus-performance/modern-zoning-code-evaluation/>

²² <https://sahfnet.org/updates/new-toolkit-measuring-outcomes-affordable-housing>

²³ <https://finmodelslab.com/blogs/kpi-metrics/affordable-housing-kpi-metrics>

²⁴ <https://bcacha.org/wp-content/uploads/2024/07/Complete-ACOP-Aug-1-2023.pdf>

federal and state laws. However, some property owners in Boise do still use blanket prohibitions when renting to individuals with criminal records, though this practice is actively discouraged by the City. For individuals with criminal records reentering society after incarceration or justice system involvement, barriers to housing can hinder their ability to rebuild their lives and may increase the risk of recidivism.

Recommendation

Work together with advocacy groups to develop materials targeted to private landlords and property managers on fair housing laws and best practices for tenant screening. The City can also implement screening policy requirements in line with HUD recommendations for housing units that receive subsidies from the City. These can be crucial steps for the City to reduce barriers for housing for individuals with previous carceral system involvement.

- 1) Use social media, local media, and community events to raise awareness about admissions policies and the importance of providing housing opportunities for justice-involved individuals.
- 2) Highlight success stories of individuals with criminal records who have successfully secured housing despite having a criminal record to inspire and inform others.

By implementing these strategies, the City can help increase awareness and understanding of housing admissions policies, reducing barriers, and promoting fair access to housing for all.

Impediment #3: Eviction History

Having an eviction on an individual's record can limit housing options because landlords and property management companies that rely on tenant screening tools may use eviction history as part of their screening process²⁵. Evictions may negatively impact a tenant's credit score, making it harder to qualify for rental housing. In some cases, tenants may not be fully aware of their rights or how to contest an eviction, leading to unjust outcomes that remain on their records.

Addressing these issues requires efforts to provide more support and resources for tenants, including legal assistance and programs aimed at preventing evictions. Additionally, policies that limit the use of eviction history in tenant screening could help reduce barriers to housing.

In Boise, most evictions are initiated by private landlords. The eviction rates for housing authority units and City-managed housing are low and almost always due to lease violations, not non-payment issues. Ada County is one of the few court systems in the state with eviction court mediation services available to help renters and landlords come to an agreement about payment, damages, move out dates, and other details.²⁶ When comparing Boise's eviction rate to other cities, it tends to be lower than many larger metropolitan areas in other states.

²⁵<https://www.policylink.org/resources-tools/tools/all-in-cities/housing-anti-displacement/eviction-records-tenant-screening-protections>

²⁶ <https://boisedev.com/news/2020/10/26/idaho-eviction-data/>

Recommendation

- 1) Communicate with Landlord/Developers
 - a) Encourage developers to use more holistic tenant screening processes that consider the context of an eviction. This includes looking at the reasons behind the eviction and the tenant's current financial stability and rental history since the eviction.
 - b) Continue to conduct workshops and provide resources to educate landlords about the benefits of fair housing practices and the potential for discrimination claims if they rely too heavily on eviction histories.²⁷
- 2) Advocacy
 - a) Continue to advocate for local ordinances that limit the use of eviction history in rental decisions (as defined in the previous Analysis of Impediments).²⁸
 - b) Collaborate with local nonprofits that specialize in housing stability, tenant rights, and mediation services. These organizations can provide support and advocacy for tenants with eviction histories to avoid future evictions.

Impediment #4: Limited Housing Options for Seniors

Limited housing options for seniors can significantly impede fair housing because there is a limited supply of affordable housing, and an even smaller supply of affordable housing that can accommodate households with disabilities or those who utilize mobility equipment. This shortage makes it difficult for low-income seniors to find suitable living arrangements. While the Boise City/Ada County Housing Authorities own two public housing developments with a total of 160 units dedicated to seniors or those with disabilities and manages a third 80-unit development for seniors or people with disabilities, the waiting list for these units is full and capped at 2,500 applicants. The housing authority refers applicants to other agencies when openings are available, but these units are quickly filled and have long waitlists.

Feedback from the service provider focus group identified several other issues, including that demand will increase as the population ages, many existing housing options are not fully accessible or equipped to meet the needs of seniors, and the difficulty of seniors who live on fixed incomes to afford market-rate housing.

In addition to the housing supply shortfall, many seniors may require essential support services such as healthcare and transportation, which may be difficult to access. Addressing these challenges requires coordinated efforts to increase the supply of affordable senior housing, improve accessibility, and provide necessary support services. Boise has been actively investing in housing initiatives, including those aimed at supporting accessible senior housing and applying for federal funds to build and sustain more affordable housing.

Recommendation

- 1) Continue to leverage federal resources to enhance housing opportunities, especially for seniors.

²⁷ <https://fairhousinginstitute.com/hud-guidance-credit-and-eviction-screening/>

²⁸ www.cityofboise.org/media/11704/draft-regional-analysis-of-impediments-to-fair-housing-choice.pdf

- 2) Maintain and increase collaborations with community partners to ensure that the housing initiatives are effective and sustainable.
- 3) Expand capacity and awareness of the City's Home Improvement Program that can fund accessibility rehabilitation for low-income homeowners.

Impediment #5: Discrimination

The Intermountain Fair Housing Council (IFHC) handles a variety of fair housing complaints. IFHC monitors fair housing compliance of housing providers, lending institutions, and local and state government and engages in enforcement activities which include investigation, testing, and complaint filing with state or federal authorities.²⁹ Some of the most common issues they address in Boise include:

- 1) Discrimination Based on Disability: Many complaints involve landlords refusing to make reasonable accommodations for tenants with disabilities. This can include denying requests for service animals or failing to modify units to be more accessible.³⁰
- 2) Racial and Ethnicity Discrimination: There are instances where housing providers treat applicants differently based on race or national origin. This can be evident through differential treatment in rental terms, conditions, or outright refusal to rent.³¹
- 3) Familial Status Discrimination: Families with children sometimes face discrimination, such as being denied housing or being subjected to different rules and conditions.
- 4) Discrimination based on Sexual Orientation and Gender Identity: Complaints also arise from discrimination against individuals based on their sexual orientation or gender identity, despite local protections.
- 5) Discriminatory Advertising: Some housing advertisements may indicate a preference or limitation based on protected characteristics.

Though IFHC can investigate and monitor the complaints that they are aware of, the number of complaints is understated. Based on the survey conducted for this Analysis of Impediments, most (90%) of Boise respondents either affirmatively understood or somewhat understood their fair housing rights. Though approximately 90% of respondents understood their rights at least somewhat, only 67% understood how to file a complaint.

When asked about the accessibility of fair housing organizations, 52% felt that these organizations were accessible while approximately 20% felt they were inaccessible. In addition, the number of complaints is understated likely due to fear of repercussions and the belief that the complaint and resolutions processes are lengthy and complex.

Recommendation

- 1) Organize a biannual update meeting with the Intermountain Fair Housing Council to:
 - a) Address impediments to fair housing
 - b) Review progress on fair housing initiatives
 - c) Identify new impediments

²⁹ <https://ifhcidaho.org/>

³⁰ <https://fairhousingforum.org/law/idaho-fair-housing-cases-chronology/>

³¹ <https://boisedev.com/news/2020/10/29/fair-housing-testers-investigate-housing-discrimination-across-idaho/>

- d) Plan future actions
 - e) Discuss housing trends, discrimination complaints, and the effectiveness of current policies
 - f) Foster a collaborative environment that effectively addresses fair housing challenges
- 2) Analyze the traffic and usage of Boise's Fair Housing website. Utilize an analytics tool to monitor key metrics including page views, unique visitors, bounce rate, average session duration, and user demographics. Utilize heatmap tools to visualize where users click, scroll, and spend the most time on the website.

Impediment #6: Housing Re-entry

The process of integrating individuals back into society after spending time in institutions, criminal or otherwise, is complex and nuanced - even more so for individuals needing to secure housing upon release/discharge. This is compounded by the shortage of available housing and the screening processes used by many property management companies.

For those who have been unhoused for an extended period, credit score, providing a landlord reference, having a criminal history, and/or completing the housing applications can be significant barriers to housing. Landlords may have policies that screen and automatically disqualify applicants with sporadic housing history, others may require higher security deposits or stricter lease terms.

Additionally, individuals leaving institutions face economic hardships, including lack of employment and financial instability, which further complicates their ability to secure stable housing. Addressing these challenges requires ongoing collaboration between the city, government agencies, non-profits, and the community.

Recommendation

- 1) Partner with nonprofits, community organizations, and reentry services (i.e., CATCH, St. Vincent de Paul, GEO Reentry Service, and Idaho Department of Correction Reentry Services, etc.) to connect individuals to community resources including housing assistance, transitional housing, and support services. These organizations play a crucial role in helping individuals overcome the barriers to housing reentry. The City's communication of these programs is critical.
- 2) Ensure that City communication is broad, consistent, and accessible. Consider where potential recipients can be reached. For example, based on the survey conducted for this Analysis of Impediments, approximately 9% of respondents are either a) in-between places, b) living with family/friends, c) experiencing homelessness, or d) are not part of the previous groups, but do not rent or own.

Impediment #7: Public & Non-Motorized Transportation

Boise's public transportation system is limited, with fewer routes and less frequent service compared to similar cities. This can make it difficult for residents, especially those without personal vehicles, to access employment, education, and essential services. This can be an impediment to housing because not all neighborhoods are well-served by public transit, which can disproportionately affect low-income and minority communities.

Infrastructure for non-motorized transportation is not uniformly developed across the city. The lack of reliable and affordable transportation options can increase the cost of living for residents, as they may need to spend more on transportation or face challenges in accessing higher-paying jobs.

In Boise, the Ada County Highway District (ACHD) manages the local public roads and the Idaho Transportation Department (ITD) manages the Interstate system and state highways. Public transit in Ada and Canyon counties is operated by Valley Regional Transit (VRT) and pathways often require easements from canal companies and/or private entities. Addressing transportation issues requires coordinated efforts to improve public transit services, expand non-motorized transportation infrastructure, and ensure equitable access to transportation options for all residents. Addressing this impediment is a challenge because Idaho is the only state without a dedicated funding source for public transit. VRT supports transit-related activities by working with the counties to leverage the federal grants, voluntary contributions, bus fares and advertising revenue that it receives.³² VRT is taking an entrepreneurial approach to attract additional needed funding.³³ The Idaho Transportation Department (ITD) provides various grants, including those for traffic safety, infrastructure, public transportation, and environmental to support transportation projects and safety initiatives statewide.³⁴

Recommendation

- 1) Build Coalitions
 - a) Collaborate with local nonprofits, advocacy groups, and neighborhood associations to build a strong coalition that supports public and non-motorized transportation initiatives.
 - b) Engage businesses that would benefit from improved transportation infrastructure, such as those in retail and hospitality sectors.

Impediment #8: Negative Perception of Affordable Housing

The negative perception of affordable housing can be an impediment to fair housing if community resistance to affordable housing developments delay or prevent the construction of necessary housing units. The stigma of affordable housing can lead to opposition to projects from residents. This stigma can lead to social exclusion and reduced access to community resources and opportunities for residents of affordable housing developments. The negative perception can also lead to appeals of planning and zoning or design review commission decisions, causing delays and increasing project costs. Addressing these negative perceptions requires community education and engagement to highlight the benefits of affordable housing to all residents and the City of Boise.

Recommendation

- 1) Reinforce current messaging/communication surrounding affordable housing, illustrating the economic benefits, and addressing misconceptions.

³² <https://www.valleyregionaltransit.org/about-us/accountability/>

³³ <https://www.ktvb.com/article/news/local/valley-regional-transit-bus-routes-new-changes-funding-for-buses/>

³⁴ <https://itd.idaho.gov/funding/>

- a) Highlight studies showing how affordable housing can boost local economies by increasing disposable income, reducing homelessness, and creating jobs in construction and related industries.
 - b) Include information that addresses common misconceptions, such as the belief that affordable housing lowers property values or increases crime rates. Use data and research to debunk these myths.
 - c) Include a clear definition of housing cost burden (a family is cost burdened when housing costs exceed 30% of a household's income).
 - d) Use social media platforms and local media to share information about the importance of affordable housing and its benefits, success stories, and updates about affordable housing initiatives. Engage with the community through comments and direct messages.
- 2) Provide regular updates on the progress of affordable housing projects and their impact on the community. Transparency can build trust and support.
 - 3) Research communities that have implemented streamlined ministerial approval processes for affordable housing development which address the appeals process. Examples of such communities include:
 - a) Los Angeles, California that created a streamlined ministerial approval process for affordable housing projects under California Senate Bill (SB) 35 and Assembly Bill (AB) 2162. These processes include administrative procedures for appeals, ensuring projects meet objective zoning standards³⁵.
 - b) The state of Massachusetts implemented statute Chapter 40B which enables local Zoning Boards of Appeals to approve affordable housing developments under more flexible rules. This process is designed to promote the development of affordable housing by streamlining the approval process and providing an administrative appeal mechanism through a Housing Appeals Committee.³⁶
 - c) Denver, Colorado has implemented several measures to streamline the appeals process for affordable housing development. The city adopted administrative rules and regulations to implement the Mandatory Affordable Housing Ordinance, which includes streamlined procedures for appeals.³⁷

Impediment #9: Complex Application Process to Access Services & Housing

The fragmentation of affordable housing resources and services offered by the City of Boise and various agencies and organizations can be an impediment to fair housing.

The City and other organizations are investing significant resources and efforts to address housing issues in Boise. However, individuals and families may struggle to navigate the different agencies, departments, and non-profits to find the services they need. Each organization may request different information and have varying requirements, making it difficult for applicants to understand the process and meet all necessary criteria. There is often insufficient support available to help applicants navigate the application process

³⁵<https://planning.lacity.gov/odocument/c90a434a-7449-4a10-a862-339ee74415b8/Affordable%20Housing%20Approval%20Process.pdf>

³⁶<https://www.mass.gov/chapter-40b-planning-and-information>

³⁷https://www.denvergov.org/files/assets/public/v/1/community-planning-and-development/documents/zoning/text-amendments/housing-affordability/expanding_housing_affordability_rules_and_regulations.pdf

which can lead to incomplete or incorrect applications, resulting in delays or denials of assistance. These barriers result in duplication of efforts and inefficiencies without a centralized system.

The City of Boise has a Housing Data Portal that provides easy access to data, maps, and interactive dashboards related to housing. However, a more comprehensive centralized portal that includes supportive services could further enhance accessibility and coordination. The combination of a centralized portal and a unified application process would be impactful. Based on feedback from focus groups with developers, they support a standard application for housing in a centralized tenant pool portal. This would reduce marketing costs for developers and provide cost savings for managers/owners. If tenants were pre-qualified, each property could efficiently match their qualifications with tenants. However, the City does not currently have the staff or financial resources to pursue the expansion of its portal to provide this functionality.

During a focus group with service providers, they expressed a need for a better system to understand the available housing inventory. Housing navigators must call every property every time they are seeking an available unit to find out if there is an opening. While these solutions would be extremely impactful, resource limitations preclude pursuing them currently.

Recommendation

- 1) Conduct outreach and education campaigns to inform residents about available resources to help reduce the complexities in accessing program offerings.
- 2) Consult with local agencies.
 - a) Reach out to the local housing authority, non-profits, and service providers to gather input to understand the specific needs and challenges faced by these agencies, find out if the need for a centralized platform is corroborated, and identify the requirements for a robust navigation system.
- 3) Create presentations and/or fact sheets that outline the benefits of a centralized navigation platform. Highlight how it can streamline access to services, improve coordination, and enhance user experience.
- 4) Arrange information sessions with community leaders, local agencies, and residents to explain the potential impact of a centralized platform. Use real-life examples and success stories from other cities to illustrate the benefits.
- 5) Advocate for development of a centralized portal.
 - a) Utilize the local agencies to collectively advocate for the necessary resources and funding.
- 6) Engage with policymakers to present the case for a centralized platform and to demonstrate the need and potential impact. Use examples such as:
 - a) Jersey City has launched a 'Consolidated Affordable Housing Web Portal'
Source: <https://jcitytimes.com/city-launches-affordable-housing-web-portal-along-with-user-training-sessions/>
 - b) The City of San Antonio Neighborhood and Housing Services Department and the San Antonio Community Resource Directory. The City of San Antonio Neighborhood and Housing Services Department and the San Antonio Community Resource Directory (SACRD) partnered to launch a new Housing Services Portal to collect, maintain and disseminate information on housing-

related services provided in San Antonio — a digital “one-stop shop” for supportive housing services.³⁸

Source: https://sacrd.org/housingservices/?gp=hsp_startingpage

- c) The City of Dallas Department of Housing & Community Development has developed a searchable database of affordable housing units located in Dallas and supportive and social services.

Source: <https://www.auntbertha.com/>

Conclusion

The City of Boise has made significant strides in updating its zoning laws to encourage additional affordable housing. The new zoning code encourages a variety of housing types and higher densities, aiming to make housing more accessible and affordable. However, there are still several impediments that need to be addressed, some of which were identified in the City of Boise Housing Needs Analysis (2024 Report Update).³⁹

- 1) **Lack of Affordable Housing Supply:** Despite the zoning updates, the supply of affordable housing remains limited. Continued investment and incentives for developers are crucial.
- 2) **Prior Criminal Record and Eviction History:** These factors often disqualify individuals from securing housing. Advocating for fair housing policies that mitigate these barriers is essential.
- 3) **Limited Options for Senior Housing:** As the population ages, there is a growing need for affordable and accessible senior housing. Despite efforts to increase housing stock, the demand and rising costs have outpaced supply. Ensuring that housing is not only affordable but also accessible for seniors with disabilities adds to the challenge. Developing specialized housing options for seniors is important.
- 4) **Discrimination:** Ensuring that anti-discrimination laws are enforced and that there is education around fair housing practices can help reduce this barrier.
- 5) **Housing Re-entry Programs:** Supporting individuals re-entering society from institutions with housing and services can reduce recidivism and homelessness.
- 6) **Public and Non-Motorized Transportation:** Improving transportation options can make affordable housing more viable by connecting residents to jobs and services. Identify new funding sources to supplement the limited funds appropriated to public transit in Boise.
- 7) **Negative Perceptions of Affordable Housing:** Community education and engagement can help shift perceptions and garner support for affordable housing projects.
- 8) **Complex Application Processes and No Centralized Portal for Supportive Services and Affordable Housing:** While simplifying and streamlining the application process for housing and services can make it easier for those in need to access support, it is a complex undertaking. There are some engagement and advocacy activities that could be pursued to lay the groundwork for the eventual development of a centralized navigation platform.

³⁸ <https://www.sa.gov/Directory/News/News-Releases/Housing-Services-Portal-has-launched>

³⁹ https://www.cityofboise.org/media/8193/boise_housing_needs_analysis_070824.pdf

Given the significant updates to zoning laws, there are fewer task-oriented recommendations and more action-oriented recommendations. As the community monitors the impact of the new zoning code, the City of Boise will play key roles related to the Analysis of Impediments. The City should convene key stakeholders to discuss the progress and challenges, continue to advocate for policies that address other impediments to fair housing, such as discrimination, criminal records, and eviction histories, increase awareness and understanding of the zoning changes and their benefits, and continue to provide clear communication to build support and reduce negative perceptions of affordable housing. By focusing on these actions, Boise can continue to make progress in reducing impediments to fair housing and ensuring that all residents have access to safe, affordable housing.