


FINAL REPORT

Analysis of Impediments to Fair Housing Choice

 **City of Meridian, Idaho**



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September 30, 2012

**Analysis of Impediments
to Fair Housing Choice**

Prepared for

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SECTION I.

Demographic and Housing Market Analysis

SECTION I.

Demographic and Housing Market Analysis

This section provides a community and housing profile for the City of Meridian. It includes the racial, ethnic and income concentration maps required by the Department of Housing and Urban Development (HUD) for Analyses of Impediments to Fair Housing Choice (AIs).

The primary data sources for the demographic and housing profile include the following: the Census (2010), American Community Survey (ACS) 1-year (2010), 3-year (2008-2010) and 5-year (2005-2009) estimates, Claritas (2010), COMPASS, and the Bureau of Labor Statistics (BLS).

Population and Household Composition

Population growth. The current population in Meridian is 75,092. Meridian is a fast growing community that has more than doubled its population in the last 10 years. In fact, Meridian accounted for 44 percent of Ada County’s growth in the last 10 years.

Figure I-1.
Population of Cities
within Ada County,
2000 and 2010

Source:
2000 and 2010 U.S. Census.

	Population		Overall Growth Percent	Average Annual Growth Percent
	2000	2010		
Meridian	34,919	75,092	115%	12%
Boise	185,787	205,671	11%	1%
Eagle	11,085	19,908	80%	8%
Garden City	10,624	10,972	3%	0%
Kuna	5,382	15,210	183%	18%
Star	1,795	5,793	223%	22%
Ada County Total	300,904	392,365	30%	3%

Age. Like many communities in the U.S., Meridian’s population is aging. The city’s population contains a larger proportion of Baby Boomers and seniors now than 10 years ago.

Figure I-2.
Age Distribution,
City of Meridian,
2000 and 2010

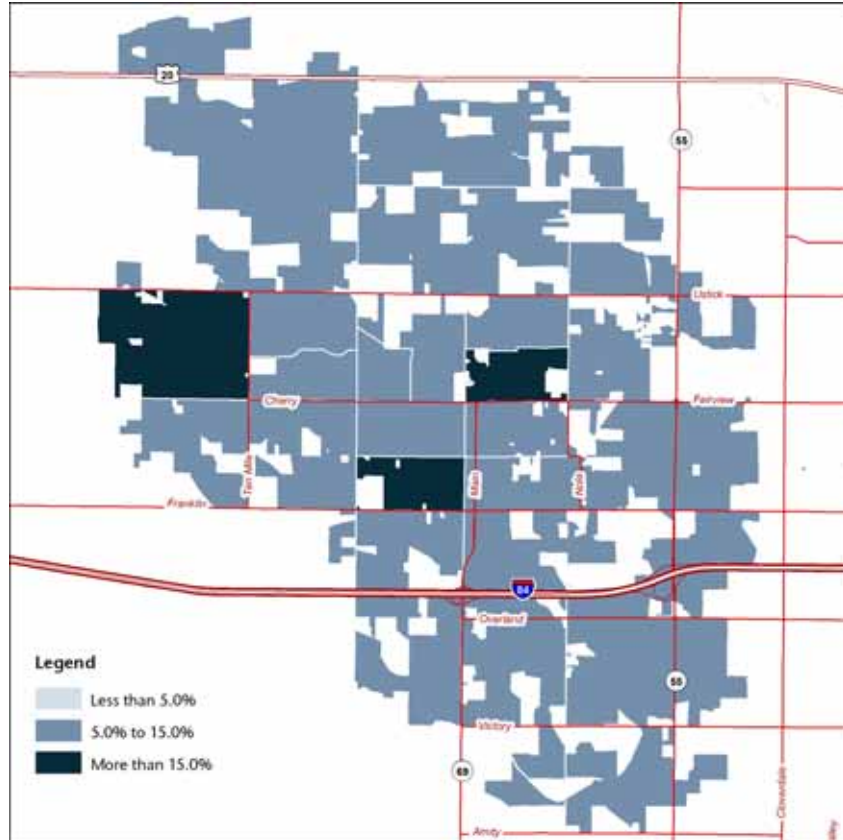
Source:
2000 and 2010 U.S. Census.

	2000		2010	
	Number	Percent	Number	Percent
Infants and Toddlers (Age 0 to 4)	3,973	11%	6,981	9%
School Aged Children (Age 5 to 19)	8,493	24%	19,685	26%
College Aged Adults (Age 20 to 24)	1,717	5%	3,296	4%
Young Adults (Age 25 to 44)	12,964	37%	22,875	30%
Baby Boomers (Age 45 to 64)	5,521	16%	15,542	21%
Seniors (Age 65 and older)	2,251	6%	6,713	9%

Senior residents currently comprise 9 percent of the city’s population. As demonstrated in Figure I-3, there are three block groups within the city that contain a relatively large proportion of seniors. One of the block groups (tract 103.22, block group 2) encompasses the core of the downtown business district.

**Figure I-3.
Percent Seniors of
Total Population by
Block Group, City of
Meridian, 2010**

Source:
2010 U.S. Census.



Race and ethnicity. The City of Meridian is largely racially White (92%) and ethnically non-Hispanic (93%). The city’s Hispanic population has been the fastest growing racial or ethnic group in the last 10 years, and now comprises 7 percent of the city’s population, compared with just 3 percent in 2000.

**Figure I-4.
Race and Ethnicity, City of Meridian, 2010**

	2000		2010		Percent Growth
	Count	Percent	Count	Percent	
Race					
American Indian and Alaska Native	117	0.3%	375	0.5%	0.2%
Asian	516	1.5%	1,345	1.8%	0.3%
Black or African American	43	0.1%	573	0.8%	0.6%
Native Hawaiian and Other Pacific Islander	66	0.2%	106	0.1%	0.0%
White	32,776	94.0%	69,071	92.0%	-2.0%
Some other race	479	1.4%	1,449	1.9%	0.6%
Two or more races	861	2.5%	2,173	2.9%	0.4%
Ethnicity					
Hispanic/Latino	1,128	3.2%	5,111	6.8%	3.6%
Non-Hispanic/Latino	33,730	96.8%	69,981	93.2%	-3.6%

Source: 2000 and 2010 U.S. Census.

Racial and ethnic concentration. One of the key components of a fair housing analysis is an examination of the concentration of different races and ethnicities within a jurisdiction to detect evidence of segregation. In some cases, racial and ethnic concentrations are a reflection of preferences—e.g., people of different races and ethnicities may choose to live where they have access to grocery stores or restaurants that cater to them. In other cases, different race/ethnic populations are intentionally steered away or discouraged from living in certain areas. Housing prices can also heavily influence where minorities live.

This report uses HUD’s definition of “disproportionate need” to define racial, ethnic and income concentrations. Using this definition, concentrations occur when the percentage of residents of a particular group is 10 percentage points higher than the community-wide average. For example, if 20 percent of residents in a particular Census block group are Hispanic and Hispanics comprise 10 percent of a community’s population overall, that Census block group contains a concentration of Latino residents.

The following maps show the proportions of Non-White and Hispanic residents by Census block group for the City of Meridian. The concentration thresholds used for the concentration maps are:

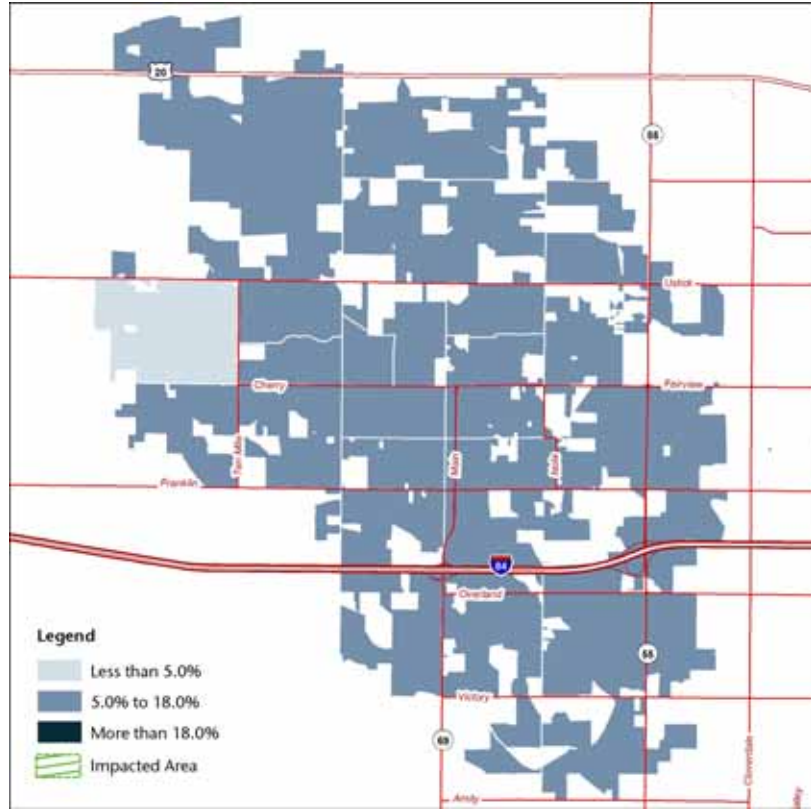
- **Non-White.** In 2010, 8 percent of residents in the city reported their race as something other than White. Census block groups that have 18 percent and more non-White residents are concentrated by the disproportionate need definition.
- **Hispanic concentrations.** In 2010, 7 percent of residents in the city reported their ethnicity as Hispanic. Census blocks that have 17 percent and more Hispanic residents are concentrated by the disproportionate need definition.

The maps also report areas that HUD terms “minority areas” or “racially/ethnically-impacted areas” which are block groups in which minority populations are 20 percentage points higher than the City of Meridian overall.

As demonstrated in Figures I-5 and I-6, there are no areas of concentration or any impact areas in the city. The Census block group with the largest proportion of non-White residents (14%) is block group 2 of Census tract 103.22, which encompasses the city’s downtown business district. The Census block group with the largest proportion of Hispanic residents (14%) is block group 2 of tract 103.21. This block group lies adjacent to the city’s main downtown area.

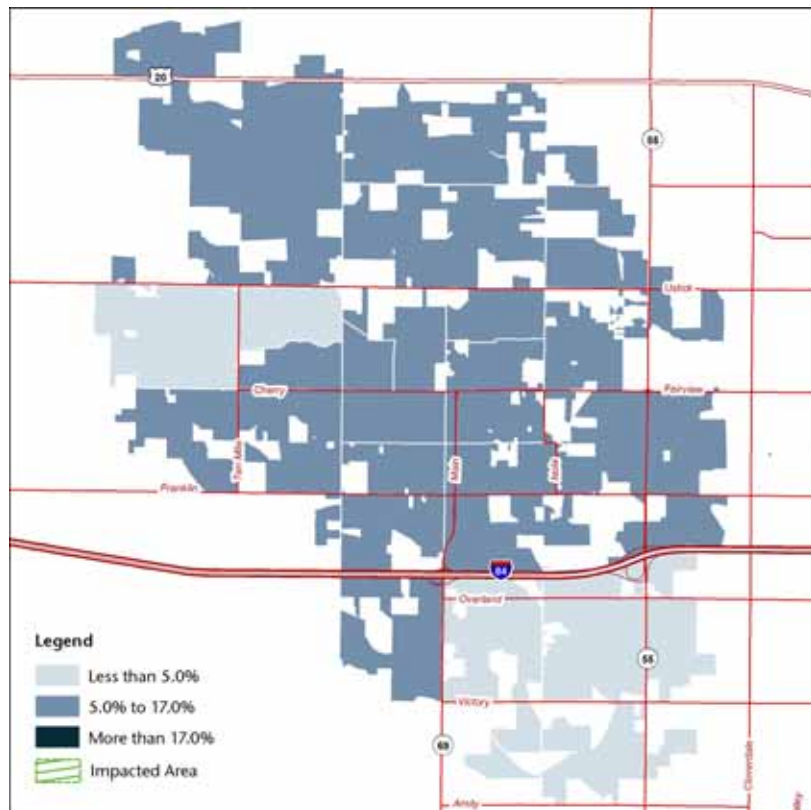
**Figure I-5.
Concentration of
Non-White
Residents, City of
Meridian, 2010**

Source:
2010 U.S. Census.



**Figure I-6.
Concentration of
Hispanic/Latino
Residents, City of
Meridian, 2010**

Source:
2010 U.S. Census.



Type of households. Seventy-nine percent of the city’s households are family households, including 64 percent husband and wife families. By comparison, family households comprise a much larger proportion of Meridian’s household composition than neighboring Boise. Family households only account for 59 percent of Boise’s households, and 44 percent of Boise’s households are husband and wife families.

**Figure I-7.
Household Composition,
City of Meridian, 2010**

Source:
2010 U.S. Census.

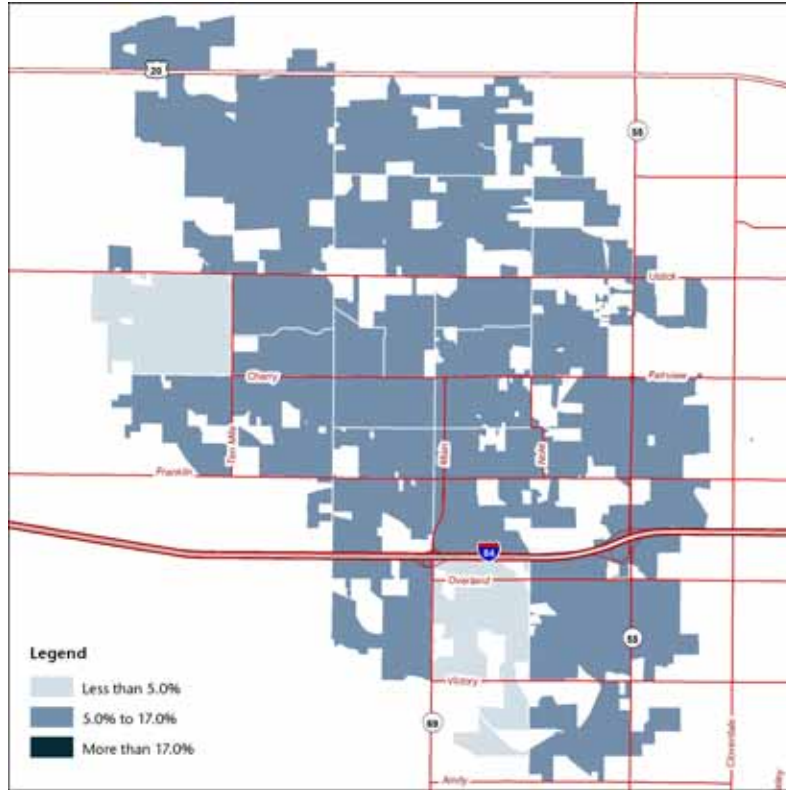
	Total Households	Percent of Total Households
Family Households	19,916	79%
Husband-wife family	16,173	64%
with children	8,859	35%
without children	7,314	29%
Male Householder - no wife	1,117	4%
with children	777	3%
without children	340	1%
Female Householder - no husband	2,626	10%
with children	1,761	7%
without children	865	3%
Nonfamily Households	5,386	21%
Total Households	25,302	100%

Familial status is protected under the Fair Housing Act. In Meridian, 11 percent of fair housing complaints filed in Meridian since 2005 were based on familial status. Similar to race and ethnicity, it is important to note the place of residence of female households with children to determine whether discrimination is preventing them from moving into certain portions of the city.

Seven percent of Meridian’s households are single female households with children. Families comprised of a single female householder and children are far more likely to live in poverty, and may require some form of public assistance to afford housing and other basic needs. This is certainly the case in Meridian. For example, 5 percent of all Meridian families live in poverty compared with 13 percent of all single female headed households and 45 percent of female households with children under the age of 5 years old. As demonstrated in Figure I-8, female-headed households are most likely to reside in the city’s downtown area.

**Figure I-8.
Geographic
Distribution of
Single Female
Households with
Children, City of
Meridian, 2010**

Source:
2010 U.S. Census.



Income and poverty. The American Community Survey (ACS) estimated the city’s 2010 median household income at \$60,230. Meridian’s households earn more than state and national residents; the median household income is \$43,490 in Idaho and \$50,046 for the U.S. overall.

Figure I-9 displays Meridian’s household income distribution. About half of Meridian’s households earn between \$25,000 and \$75,000 per year. An additional 16 percent of the city’s households earn less than \$25,000 per year.

**Figure I-9.
Household Income
Distribution, City of
Meridian, 2010**

Source:
2010 American Community Survey.

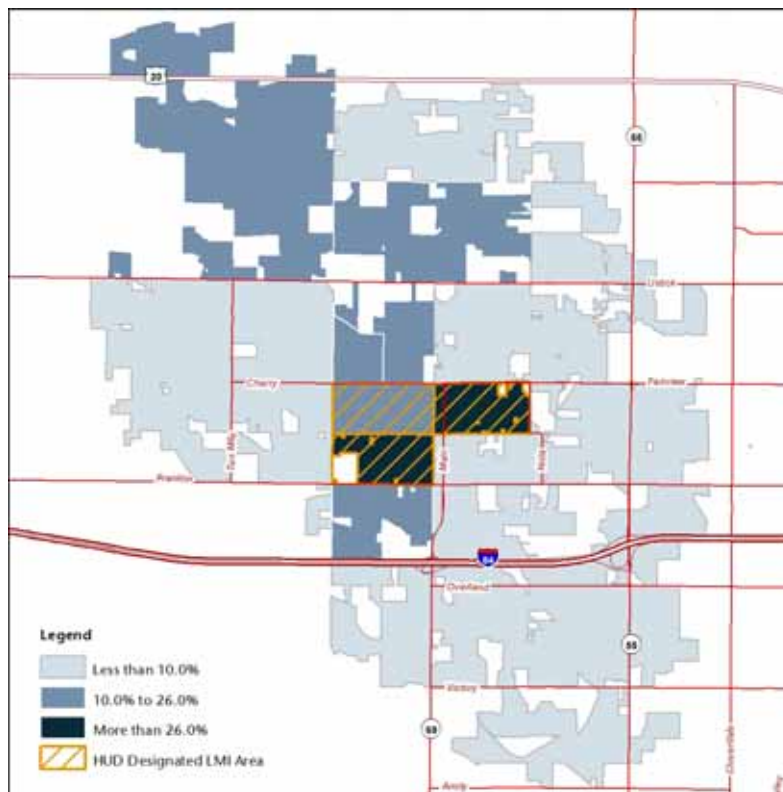
	Total Households	Percent of Households
Less than \$10,000	1,012	4%
\$10,000 to \$24,999	3,140	12%
\$25,000 to \$49,999	6,563	25%
\$50,000 to \$74,999	6,370	24%
\$75,000 to \$99,999	3,473	13%
\$100,000 to \$149,999	2,911	11%
\$150,000 or more	2,563	10%

Figure I-10 displays the geographic distribution of the city's lowest income households by Census block group. Two block groups contain more than 26 percent low income households. By HUD's definition of disproportionate need, these two block groups contain a concentration of low income households in the city. Both block groups are located in downtown Meridian.

Figure I-10.
Geographic
Distribution of Low
Income Households,
City of Meridian,
2010

Note:
 Households earning less than \$25,000 per year used as a proxy for low income.

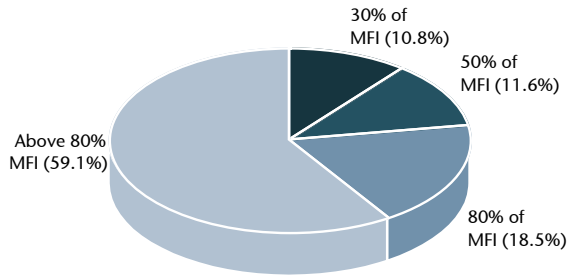
Source:
 2010 Claritas.



Median Family Income (MFI) is used by HUD and state and local policy makers to qualify households for various housing programs. According to HUD, the MFI for the Boise-Nampa MSA in 2011 was \$62,100. The following classifications utilize MFI to define income levels according to HUD's categorization:

- Extremely low—30 percent and less of MFI (\$18,630 and less);
- Very low—31 to 50 percent of MFI (\$18,631 to \$31,050);
- Low and moderate—51 to 80 percent (\$31,051 to \$49,680);
- Above low and moderate—80 percent and above of MFI (more than \$49,680);

Figure I-11.
Distribution of Low Income Households by HUD Income Classification Categories, City of Meridian, 2010



Source: 2010 American Community Survey.

Figure I-11 shows the percentage of Meridian households within each MFI category. The largest proportion of households in Meridian (59%) were considered “above low and moderate income,” earning more than \$49,680. These households would likely not qualify for HUD-funded programs. Eleven percent of Meridian’s households earn less than 30 percent of the local MFI and would be considered by HUD’s standards “very low income.”

Meridian’s 6 percent poverty rate is relatively low compared to the poverty rate in Idaho (16%) and the U.S. (15%). Moreover, Meridian’s child poverty rate of 7 percent is much lower than the national child poverty rate of 21 percent.¹

Figure I-12 displays poverty rates by age group for Meridian residents. The city’s college age students have the highest poverty rate at 14 percent, which is not surprising given that many of these individuals are likely enrolled in college or are just beginning careers. Moreover, this segment of the population has been heavily impacted by the recent economic downturn. Surprisingly, only 1 percent of the city’s seniors are living in poverty. Given that this segment of the population often lives on a fixed income, poverty rates among seniors are typically higher than 1 percent.

Figure I-12.
Poverty Status by Age, City of Meridian, 2010

Source:
 2010 American Community Survey.

	Total Population	Percent in Poverty	Percent of Age Group
Infants and Toddlers (Age 0 to 4)	520	10.9%	8.3%
School Aged Children (Age 5 to 17)	1,175	24.5%	6.2%
College Aged Adults (Age 18 to 24)	551	11.5%	13.8%
Young Adults (Age 25 to 44)	1,715	35.8%	7.4%
Baby Boomers (Age 45 to 64)	763	15.9%	4.5%
Seniors (Age 65 and older)	65	1.4%	1.1%
Total	4,789	100%	

¹ Poverty rate includes all children under the age of 18. Data source is the 2010 U.S. Census.

Disability status. Disability status is an important component of fair housing analysis, particularly in Meridian and the Boise region. Disability status has been the basis for a number of fair housing related lawsuits. And, according to HUD, 61 percent of the 18 fair housing complaints filed in Meridian between 2005 and 2011 were on the basis of disability.

Nearly 7 percent of all residents in Meridian report having a disability. The city’s seniors have the highest rate of disability at 24 percent.

**Figure I-13.
Disability Status by Age,
City of Meridian, 2010**

Source:
2010 American Community Survey.

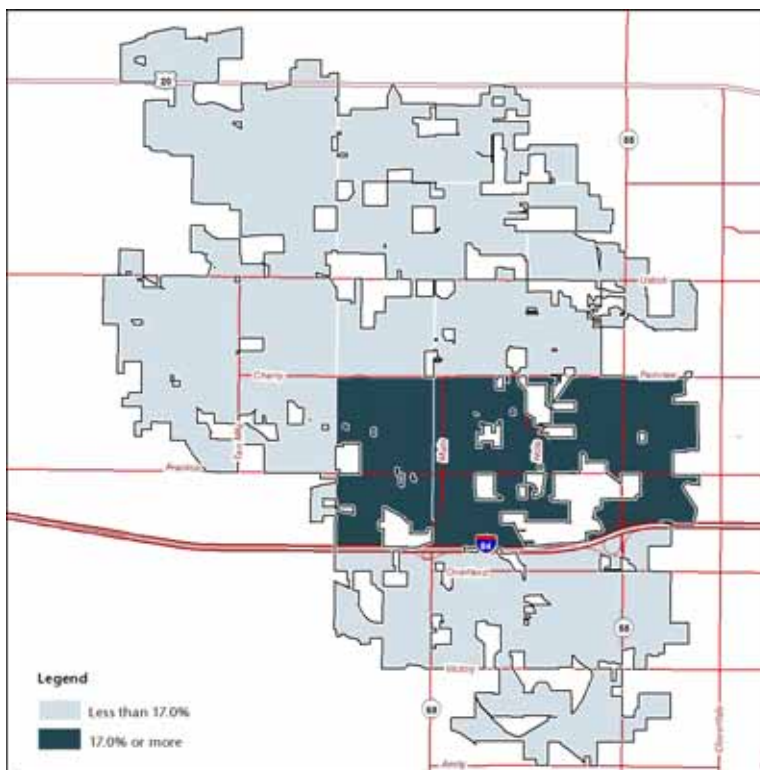
	Total in Age Group	With a Disability	Percent of Age Group
Under 5 years of age	6,284	-	0.0%
5 to 17 years of age	19,030	372	2.0%
18 to 34 years old	14,389	594	4.1%
35 to 64 years old	29,846	2,615	8.8%
65 years and older	5,697	1,347	23.6%
Total	75,246	4,928	6.5%

Ambulatory or physical disabilities are the most commonly cited type of disability among Meridian’s residents. Forty-six percent of persons with a disability aged 18 to 64 report having an ambulatory disability, as do 18 percent of disabled seniors.

Figure I-14 maps the location of the city’s residents with disabilities by Census tract. Tracts located in the central portion of the city do contain concentrations (according to HUD’s definition of disproportionate need) of persons with disabilities. This is partially impacted by the city’s disabled senior population.

**Figure I-14.
Percent of Population
with a Disability by
Census Tract, City of
Meridian, 2011**

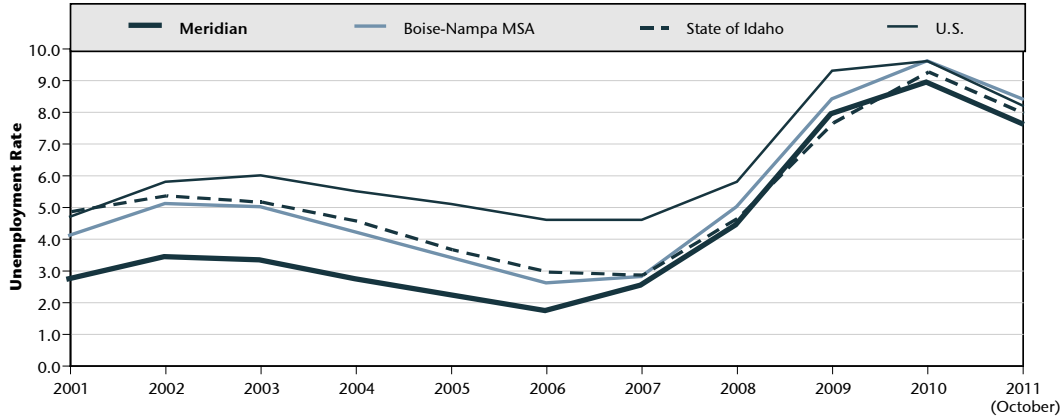
Source:
2005-2010 ACS 5-year estimate.



Economic Characteristics

Unemployment. In the midst of the recent economic recession, the Boise region and the City of Meridian have not been immune to increases in unemployment. The city and the region experienced substantial job loss between 2007 and 2009, which resulted in unemployment rates in Meridian growing from 2.5 percent to 7.9 percent between 2007 and 2009. Meridian’s unemployment rates have historically trended below the MSA, the state and the U.S., and it remains that way in October 2011.

Figure I-17.
Unemployment Rate, Boise MSA, Idaho, U.S, 2000 to 2011



Note: Data are not seasonally adjusted annual averages.
Source: Bureau of Labor Statistics.

Jobs and wages. As demonstrated in Figure I-18, Ada County’s employment base is largely associated with service jobs (85%) that pay an average annual wages of \$37,000 per year. Manufacturing jobs pay the highest wages in the county; however, they only comprise 9 percent of the county’s total employment. Overall, the county’s private sector employment opportunities pay an average of \$40,000 per year.

Figure I-18.
Employment and Wages, Ada County, 1Q2011

Note:
Employment data only available by county.

Source:
Bureau of Labor Statistics.

	Employment		Average Annual Wages
	Number	Percent	
Goods Producing	23,252	14.6%	\$58,344
Natural Resources and Mining	722	0.5%	\$32,084
Construction	8,118	5.1%	\$39,156
Manufacturing	14,412	9.0%	\$70,512
Servicing Producing	136,317	85.4%	\$37,024
Trade, Transportation, and Utilities	36,306	22.8%	\$36,036
Information	3,514	2.2%	\$46,072
Financial Activities	10,661	6.7%	\$51,688
Professional and Business Services	32,785	20.5%	\$43,680
Education and Health Services	30,241	19.0%	\$39,936
Leisure and Hospitality	17,649	11.1%	\$14,664
Other Services	5,143	3.2%	\$24,024
Unclassified	18	0.0%	\$50,908
Total Private Employment	159,568		\$40,092

Largest employers. Figure I-19 displays the largest employers in the Boise-Nampa MSA. Many of the region's largest employers have multiple locations, some of which are in Meridian (e.g., St. Luke's Regional Medical System, Wal-Mart). The Meridian School District is the fifth largest employer in the region with 4,000 employees. The school district is very large, and does extend outside the city's boundaries. Most of the region's largest private sector employers included in Figure I-17 are located in Boise. Meridian's employment base is primarily comprised of smaller firms involved in retail and services.

Figure I-19.
Major Employers, Boise City-Nampa MSA, 2011

Employer	Number of Employees	Industry
State of Idaho	8,489	Government
St. Luke's Regional Medical System	7,677	Healthcare Services
Micron Technology, Inc.	5,000	Semi Conductor Mfg.
WalMart	4,235	Retail/Grocery
Meridian Joint School District #2	4,000	Education
Boise State University	3,952	Education
St. Alphonsus Regional Medical System	3,407	Healthcare Services
Hewlett-Packard Company	4,000	Laser Printing Div
Albertson's/A Supervalu Company	2,500	Grocery/Retail
Ada and Canyon County	2,308	Government
Boise School District	2,200	Education
IDACorp. (Idaho Power)	1,961	Utility
J. R. Simplot	1,800	HQ/Food Production
Nampa School District	1,700	Education
City of Boise	1,600	Government
DirecTV	1,400	Customer Service
Citi	1,250	Inbound - Credit Card Sales/Service
Darmody Enterprises (McDonald's)	1,250	Retail Food
Veteran's Affairs/Medical Center	1,250	Healthcare Services
Fred Meyer	1,200	Retail/Grocery
WDS Global Services	1,100	Customer Service Call Center
EDS	1,000	Inbound - 3rd Party (military)
Teleperformance USA	950	Inbound Customer Service
Vallivue School District #139	950	Education
URS	900	Construction/Engineering Services (Gov't, Mining & Power Industries)

Source: Boise Valley Economic Partnership.

Housing Market Analysis

Development trends. Figure I-20 displays the number of residential building permits issued in Meridian. As is the case in many communities, residential permitting peaked in the middle portion of the last decade and drastically declined starting in 2007.

Figure I-20.
Residential Permits,
City of Meridian,
2001 to 2010

Source:
COMPASS.

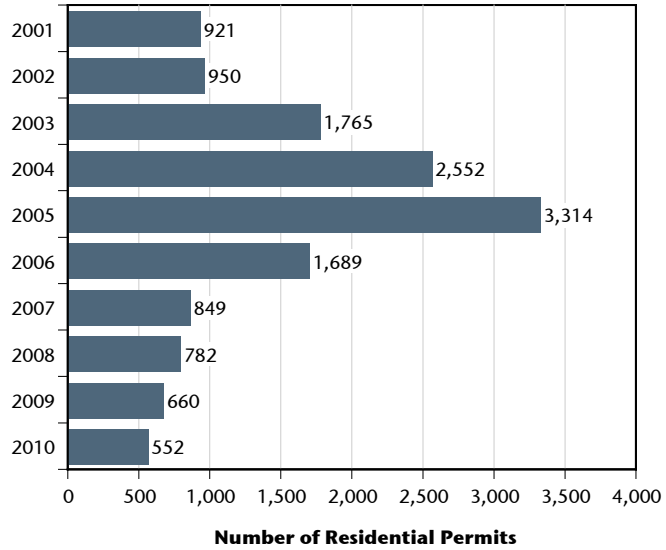
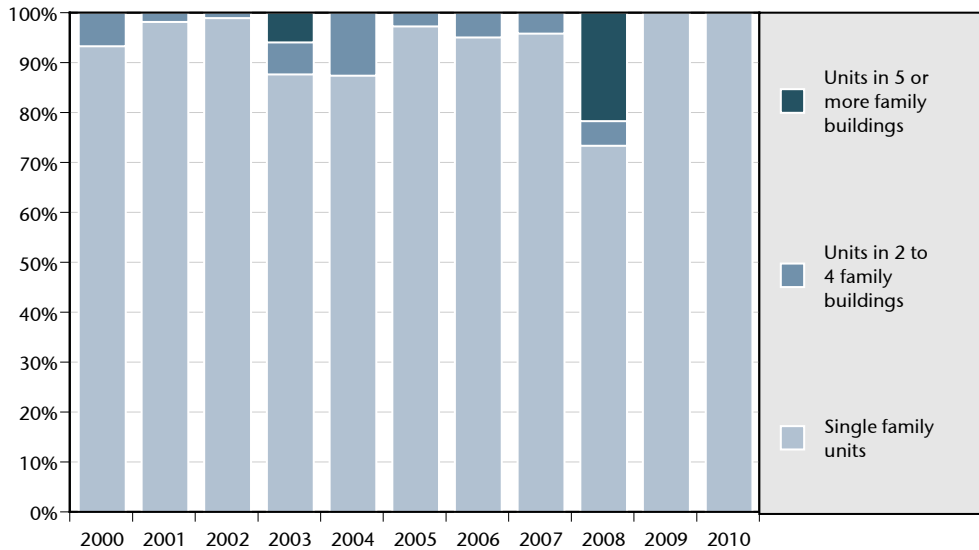


Figure I-21 examines the number of permits issued in Meridian by product type. According to permit data, single family units comprised much of the city's development in the last 10 years. Assuming permits resulted in built units, the largest proportion of multifamily units was constructed in 2008 when 26 percent of all permits were issued for multifamily development.

Figure I-21.
Percent of Regional Permits by Product Type, City of Meridian, 2001 to 2010



Note: Percentages based on estimates with imputations.

Source: U.S. Census Building Permit Estimates.

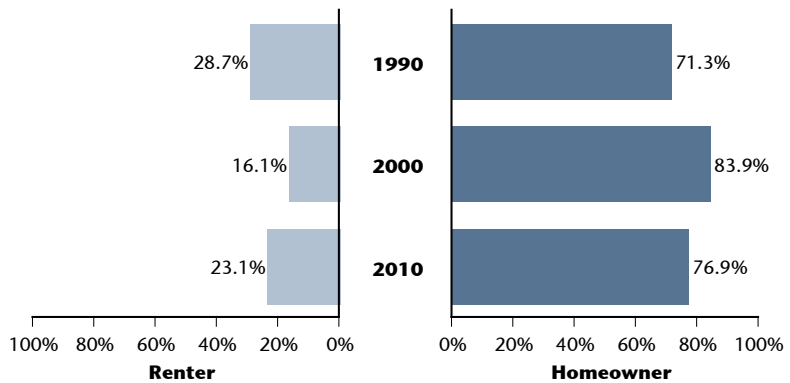
Housing supply. There are currently 26,674 housing units in the City of Meridian. The vacancy rate reported in the 2010 Census was 5.1 percent, indicating that 1,372 of the city’s housing units were vacant at the time of the Census. Most units were vacant because they were either for sale (612) or for rent (293).

The city’s housing market has experienced remarkable growth in the last 20 years. The city had approximately 3,700 housing units in 1990 and 12,300 in 2000. The 600 percent increase in the size of the city’s housing inventory since 1990 has resulted in the city’s evolution from a small farm community to the 3rd largest community in Idaho.

Tenure. Between 1990 and 2000, the proportion of homeowners in the city grew from 71 percent to 84 percent. However, the percentage of homeowners decreased in the last 10 years and currently stands at 77 percent, which indicates that 23 percent of the city’s households currently rent their home.

**Figure I-23.
Housing Tenure, City of Meridian, 1990, 2000 and 2010**

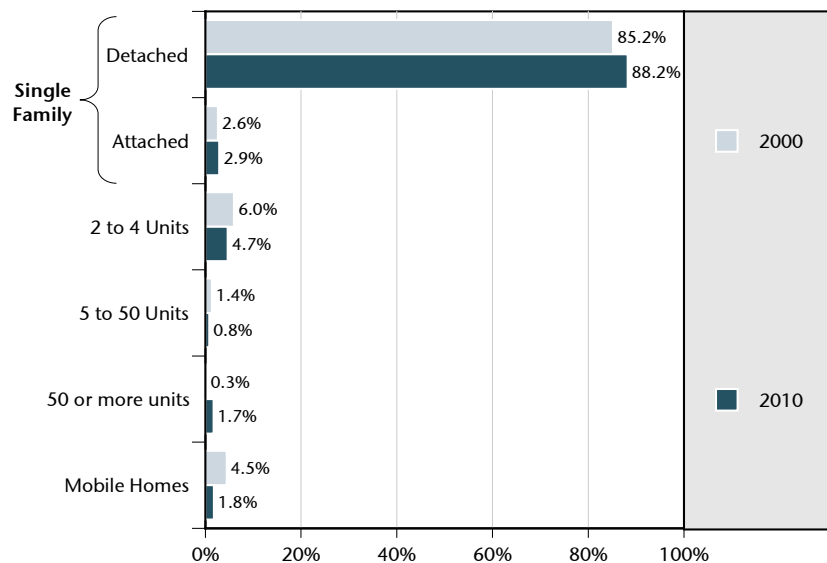
Source:
1990, 2000 and 2010 U.S. Census.



Type. Despite the extensive growth in the local housing market, the distribution by type of housing unit has changed very little in the last few years. This means that housing construction in the last 10 years reflected the city’s existing housing stock in 2000. The city has lost some of its existing mobile home stock, which has resulted in a larger proportion of single family detached units.

**Figure I-25.
Distribution by Type of Housing Unit, City of Meridian, 2000 and 2010**

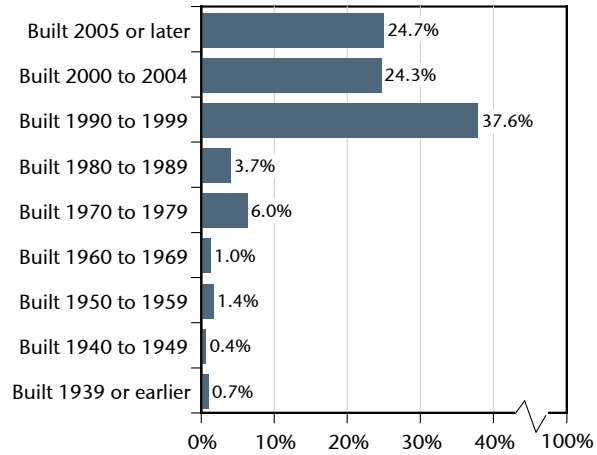
Source:
2000 U.S. Census and 2008-2010 American Community Survey.



Age. Given the city’s rapid growth in the last 20 years, it’s no surprise that nearly 90 percent of the city’s housing units were constructed after 1990. However, there are homes in Meridian constructed in the 1970s, indicating that 6 percent of the city’s homes are approaching 40 years of age. Figure I-26 displays the age distribution of the city’s housing stock.

Figure I-26.
Age Distribution of Housing Stock, City of Meridian, 2010

Source:
 2010 American Community Survey.



Housing demand and cost. This section discusses the cost of housing for both rental and homeownership housing. It then discusses demand and gaps in provision of housing to determine the greatest housing needs in Meridian.

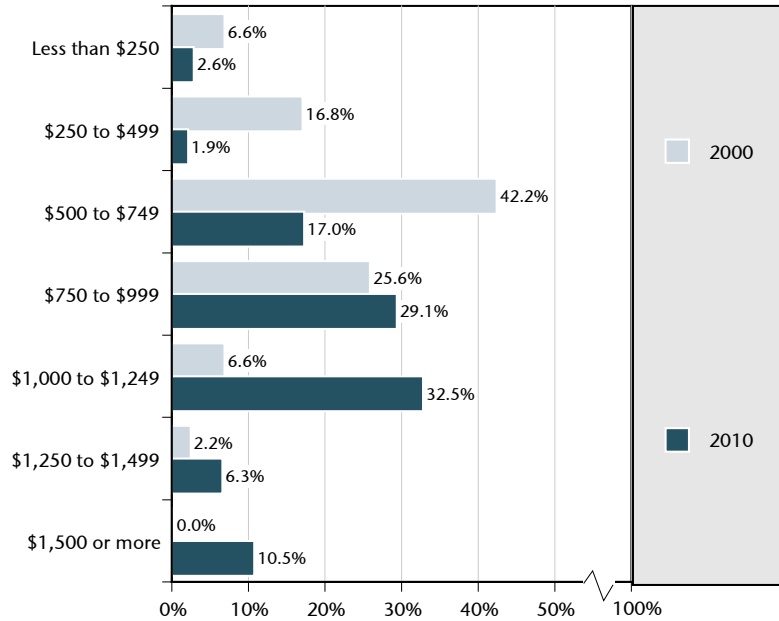
Rental costs. The gross median rent in the City of Meridian in 2010 was \$965, which was an increase of 53 percent from the 2000 median rent of \$629. The city’s median gross rent is significantly higher than the median gross rent for Ada County overall (\$751), as well as neighboring Boise \$718.²

Figure I-27 displays the distribution of gross rental rates within the City of Meridian in 2000 and 2010. In the last 10 years, the city’s rental rates have become increasingly more expensive. In 2000, residents would be challenged to find a unit requiring a rent of \$1,000 or more; currently, half the city’s rental units have rents of \$1,000 or more.

² The Census Bureau defines gross rent as “the amount of the contract rent plus the estimated average monthly cost of utilities (electricity, gas, water and sewer) and fuels (oil, coal, kerosene, wood, etc.) if these are paid for by the renter (or paid for the renter by someone else).”

Figure I-27.
Gross Rental Rate
Distribution, City of
Meridian, 2000 and 2010

Source:
 2000 and 2010 Census.



Renter incomes have increased in the last 10 years to account for increased rental rates. The median household income of a renter household in 2000 was \$27,148; it was \$38,494 in 2010. While the city’s median renter household income did not grow as quickly rental rates in Meridian, the median household income of renters is enough to afford the city’s median gross rental rate.

Despite increases in renter’s income, the city’s median rental rates now require a larger proportion of renters’ household income. Median gross rent as a percentage of renter household income in 2000 was 26 percent; the 2010 ACS reported that the percentage had increased to 33 percent. HUD’s generally accepted definition of affordability is for “a household to pay no more than 30 percent of its annual income on housing.”³ On average, Meridian’s renter households slightly exceed HUD’s affordability standard.

Rental gaps. To understand more specifically where the rental market in Meridian fails to meet residents’ needs, we performed an exercise called a “gaps analysis.” The gaps exercise compares the supply of rental housing at various price points to the number of households who can afford such housing. If there are more rental units than households, the market is “over-supplying” rental housing at that price range. Conversely, if there are too few units, the market is “under-supplying” housing. Figure I-28 displays the results of the rental market gaps analysis.

³ <http://www.hud.gov/offices/cpd/affordablehousing/>

Figure I-28.
Mismatch in Rental Market by Household Income, City of Meridian, 2010

Household Income Range	Renters		Maximum Affordable Rent (including utilities)	Available Housing (including Section 8 Vouchers and vacant units)		Rental Gap
	Number	Percentage		Number	Percentage	
Less than \$10,000	682	12%	\$ 250	229	4%	(453)
\$10,000 to \$14,999	442	8%	\$ 375	197	3%	(245)
\$15,000 to \$19,999	336	6%	\$ 500	74	1%	(262)
\$20,000 to \$24,999	270	5%	\$ 625	153	2%	(117)
\$25,000 to \$34,999	703	13%	\$ 875	1,768	29%	1,065
\$35,000 to \$49,999	1,037	18%	\$ 1,250	2,804	46%	1,767
\$50,000 to \$74,999	1,371	24%	\$ 1,875	775	13%	(596)
\$75,000 to \$99,999	357	6%	\$ 2,500	147	2%	(210)
\$100,000 to \$149,999	288	5%	\$ 3,750	0	0%	(288)
\$150,000 or more	123	2%	\$ 3,751	0	0%	(123)
Total	5,609	100%		6,147		

Source: BBC Research & Consulting.

As shown in Figure I-28, there are 682 renters earning less than \$10,000 per year living in Meridian—but just 229 units to serve them. This leaves a shortage of 453 units for the city’s lowest income households. These renters have such low incomes that they can only afford to pay \$250 per month in rent.

Altogether, the City’s rental gap is 1,077 for renters earning less than \$25,000 per year. Renters earning more than this can find an adequate supply of units. In particular, renters earning between \$25,000 and \$50,000 have an abundance of units affordable to them. The City’s highest income renters could pay more in rent than what the market has available to serve them; however, these renters likely pay less than their maximum affordable rent to save for a down payment for a home purchase.

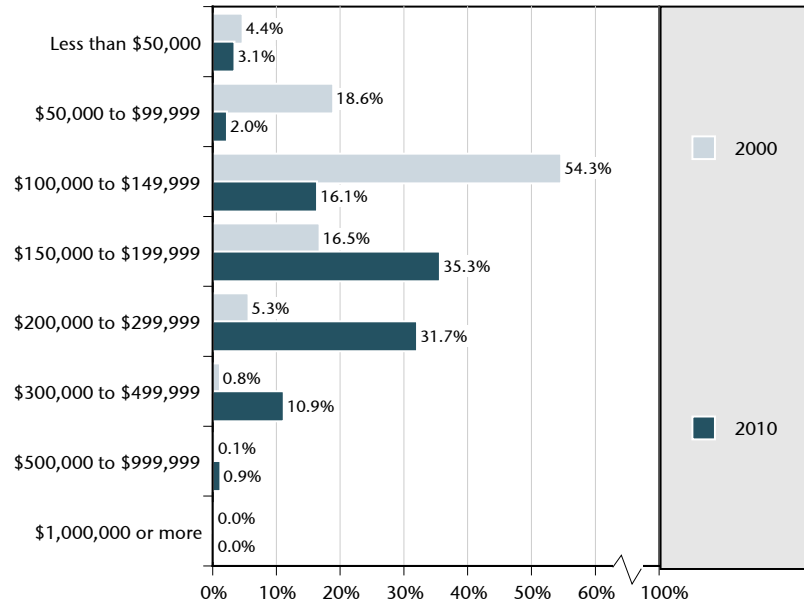
Owner costs. The median value of an owner-occupied home in the City of Meridian is \$190,400 according to the 2010 Census. By comparison the median home value in Boise is \$188,900.

In 2000, the Census estimated Meridian’s median home value to be at \$119,800. Based on these estimates, the median has increased by \$70,600 (59%), or by an average of \$7,060 per year.

Figure I-29 demonstrates how the city’s owner-occupied housing market has changed in the last 10 years. More than half the city’s homes were valued between \$100,000 and \$150,000 in 2000. Many of those homes likely appreciated between 2000 and 2010, and are now valued higher than \$150,000. Additional changes to the distribution of the city’s housing market are likely attributed to new construction that occurred in the last 10 years. New construction likely favored homes valued at \$200,000 or more.

Figure I-29.
Owner-Occupied Home Value Distribution, City of Meridian, 2000 and 2010

Source:
 2000 and 2010 Census.



The housing market downturn impacted Meridian profoundly both in sales activity and sales prices. In the last four years, the average sales price has declined by 37 percent. And, 2010 produced the lowest number of annual sales of the last five years.

Figure I-30.
Frequency and Average Sales Price of MLS Sales, City of Meridian, 2006 to 2010

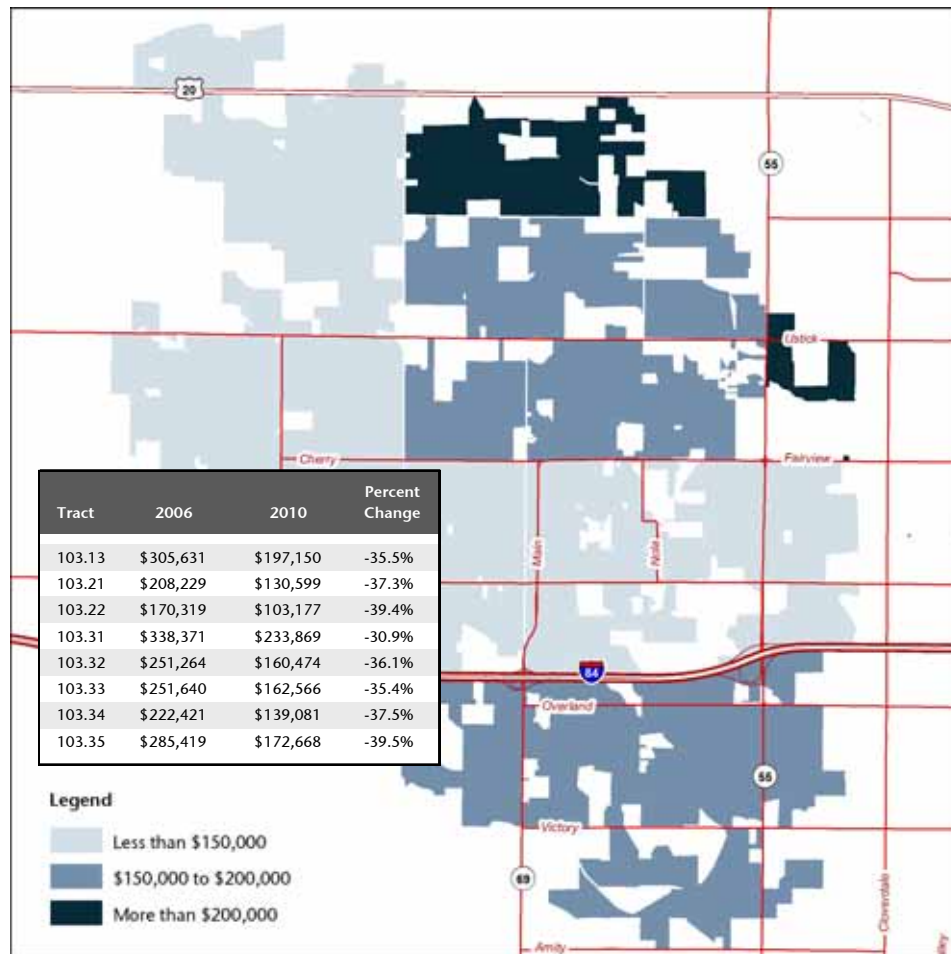
Source:
 COMPASS and Intermountain MLS .

	Sales	Average Price
2006	3,271	\$ 269,515
2007	1,864	\$ 167,924
2008	1,464	\$ 234,706
2009	1,614	\$ 187,171
2010	1,426	\$ 168,547

Figure I-31 maps the 2010 median sales price by Census tract. There was no portion of the city that did not experience a decline in home prices in the last five years. Average sales prices declined by 35 to 40 percent in every Census tract in the city but one (103.31).

Figure I-31.
Average MLS
Sales Price
by Census
Tract, City of
Meridian,
2010

Source:
 COMPASS and
 Intermountain MLS .



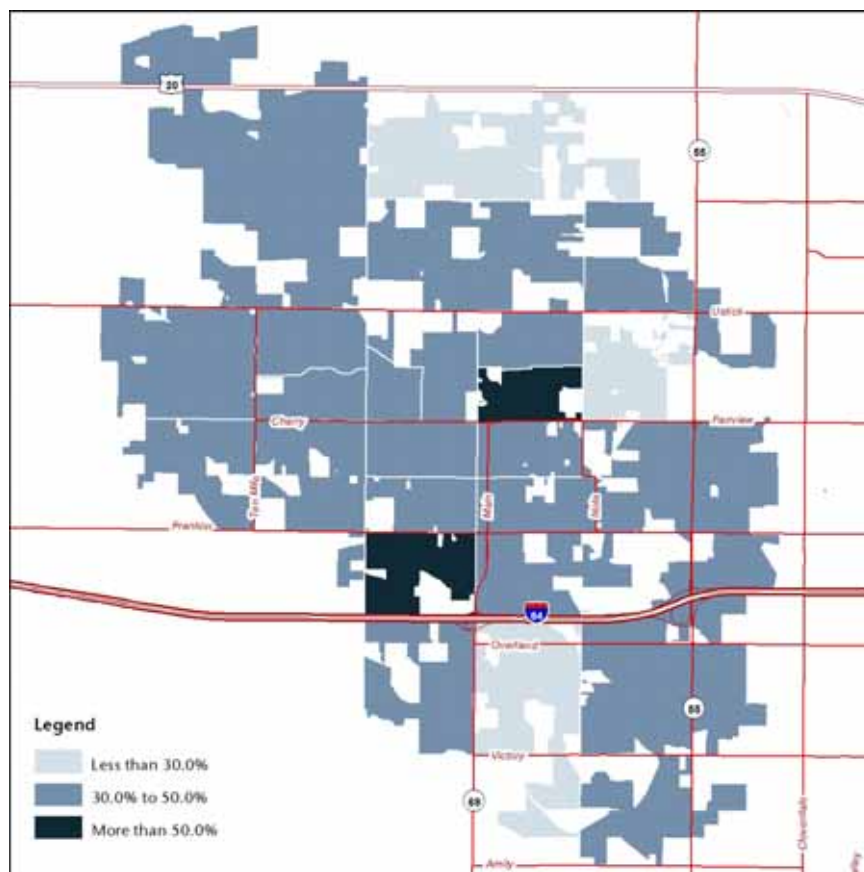
Foreclosure Analysis

According to RealtyTrac, there were 324 new foreclosure filings in Ada County in November 2011. This foreclosure rate indicates that one in every 485 homes in the county received a foreclosure filing in November 2011. This was a higher foreclosure rate than the State of Idaho (one in every 770 housing units) and the U.S. overall (one in every 579 housing units). Meridian's housing stock represents 17 percent of the county's housing stock. Assuming foreclosures in Meridian occur in proportion with the city's contribution to the county's housing stock (17%), Meridian may have had 55 foreclosure filings just in November 2011.

Figure II-40 maps the percentage of bank owned properties of total home sales in 2010 by block group. Since foreclosures are not identified in the MLS, bank owned properties are used as a proxy for foreclosures. Bank owned properties accounted for 30 to 50 percent of all home sales in 2010 in most of the city's block groups. The proportion of banked owned properties of total sales exceeded 50 percent in two of the city's block groups. Both block groups were located in central Meridian.

**Figure I-32.
Percent Bank
Owned Properties,
of Total Sales by
Block Group, 2010**

Source:
COMPASS and BBC Research
& Consulting.



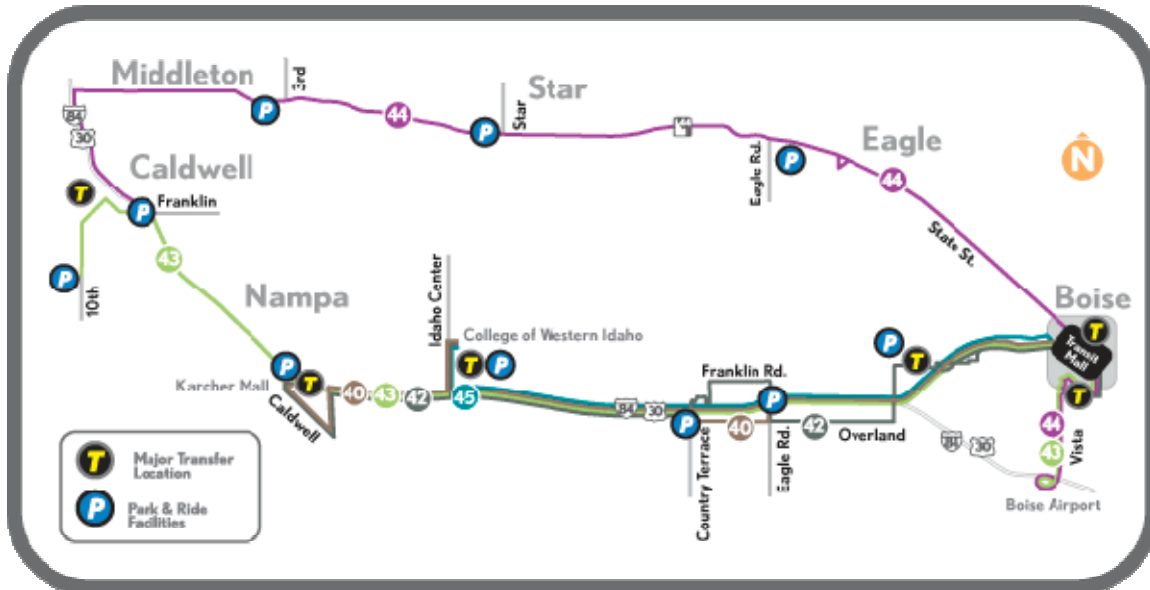
Transportation

Like many western communities, residents in Meridian and the Boise region are primarily dependent on cars for transportation. Nearly 80 percent of Meridians residents drove alone to work each day. And, less than 1 percent of the city's workers relied on public transportation for their work commute.⁴

The Boise region is served by Valley Regional Transit (VRT), which provides public transit for both Ada and Canyon counties. Figure I-33 displays VRT's inter-county bus lines. The purpose of the inter-county bus line is largely to connect Boise with the City of Nampa; however, Meridian is served along Interstate 84. Stakeholders and residents engaged during the public input process both noted that public transportation opportunities are very limited in Meridian.

⁴ Means of transportation to work statistics from the 2010 American Community Survey 1-year estimate.

Figure I-33.
Valley Regional Transit Bus Lines, City of Boise, 2011



Source: Valley Regional Transit.

Public transportation for special needs population. The VRT’s ACCESS program is a paratransit service for regional residents with disabilities who are unable to access ValleyRide’s traditional bus services. ACCESS is an origin to destination transit service operating Monday through Saturday with the same hours as the fixed-line bus system. ACCESS will travel up to three-fourths of a mile off fixed-line routes for service pickups. If residents live further than three-fourths of a mile from a fixed-line service, they must get to a bus stop to receive ACCESS services.

The Meridian Senior Center transports homebound seniors from their homes to the Meridian Senior Center Monday through Friday for lunch. Every Wednesday, the Senior Center will also take seniors to Albertsons for grocery shopping.

SECTION II.
Public Policies and Practices

SECTION II.

Public Policies and Practices

This section reviews city zoning and land use policies, as well as the policies and practices of the Boise City Ada County Housing Authority (BCACHA), for barriers to fair housing choice and violations with the Federal Fair Housing Act. The section also contains the results of an examination of a sample of Homeowners Associations' covenants. It concludes with an overview of city goals and objectives related to housing and community development.

Public Housing Authority

BCACHA serves as the housing authority for the City of Meridian, as well as Ada County, and provides housing to the city's lowest income households primarily through the Section 8 voucher program and public housing units.

Section 8 Voucher Program. The BCACHA administers 1,794 Section 8 vouchers in Ada County. Most BCACHA vouchers are used within the City of Boise (64%). The remaining 36 percent of vouchers are spread throughout the remaining portions of the county, including Meridian. The BCACHA currently administers 185 vouchers to residents of Meridian.

As of May 2011, there were 5,331 households on the Section 8 waitlist. It is likely that as many as 550 Meridian households are currently waiting for a Section 8 voucher.¹ The BCACHA estimates that households on the waitlist will wait four to five years for a voucher.

Figure II-1 displays the demographic characteristics of all households on the Section 8 waitlist. Waitlisted households are largely categorized as extremely low income. African American and Hispanic residents are disproportionately represented on the Section 8 waitlist; African Americans account for less than 2 percent of the city's population, but 7 percent of waitlisted households.

Figure II-1.
BCACHA Section 8 Waitlist, Household Demographics, City of Meridian, 2011

	Number	Percent
Applicants on Active Waitlist	5,331	100%
Household Characteristics		
Families with children	2,920	55%
Elderly families	495	9%
Families with disabilities	2,064	39%
Income		
Extremely low income	4,449	83%
Very low income	820	15%
Low income	23	0%
Race/Ethnicity		
American Indian/Alaskan Native	127	2%
Asian	211	4%
Black/African American	394	7%
Native Hawaiian/Pacific Islander	63	1%
White	4,237	79%
Hispanic	523	10%
Non-Hispanic	4,053	76%

Note: Demographic data is not provided for all applicants. Household characteristics income and race/ethnicity categories will not sum to 100 percent.

Source: BCACHA.

¹ The BCACHA does not differentiate between City of Boise and Ada County applicants on the waitlist. Meridian residents account for 10 percent of all voucher recipients, and are assumed to account for 10 percent of all waitlisted households.

Section 8 policies. According to BCACHA's website, households can check their status on the waitlist online or by calling or visiting the BCACHA office. Households are notified by mail when a voucher becomes available to them.

To stay on the Section 8 and/or public housing waitlist, residents must report changes of address, phone, household members or local preference in writing within 10 working days of the change. Residents must also respond to requests made by the BCACHA. Failure to abide by these rules may result in the removal of residents from the waitlist.²

Until April of 2011, this information was presented on the rental assistance application found on the BCACHA's website. According to BCACHA, the online rental assistance application was removed from the BCACHA website in April 2011 when the wait list for the Section 8 voucher program was closed. Due to federal funding cuts, and a wait list of approximately 5,000 households, with an estimated wait time of 4 – 5 years for assistance, BCACHA stopped accepting applications for the Section 8 program.

The BCACHA also recently suspended all Section 8 waitlist preferences, with the exception of the following categories:

- Applicants with a Family Unification Program referral from the Department of Health and Welfare;
- Applicants with a Homeless Program referral from one of the BCACHA recognized referring agencies;
- Applications with a CATCH program referral from the City of Boise;
- A household whose head or co-head (or at least one adult member) is working at least 20 hours per week, with verifiable income or whose head or co-head is participating in a BCACHA recognized job preparedness/self-sufficiency program or a household whose head or co-head is either elderly (62 or older), and/or handicapped and unable to work; and
- A household whose head or co-head is fleeing their home due to domestic violence.

If a household does acquire a Section 8 voucher, the BCACHA provides assistance to recipients in the following ways:

- The BCACHA provides recipients with information on the location of accessible units in the region;
- They provide residents with an online checklist to evaluate apartments. The BCACHA encourages residents to evaluate the condition of the unit and the neighborhood; the cost of utilities; and the home's proximity to public transportation, employment, schools, medical facilities and shopping.

² These policies are presented on the rental assistance applications found here: http://www.bcacha.org/rental_assist_app_12-07-2009.pdf

- The BCACHA encourages residents to find housing outside of high poverty areas in hopes of increasing access to good schools, job opportunities, better quality housing and responsive landlords.

Public housing. The BCACHA has 230 public housing units located in Boise. There are no public housing units in Meridian. Both facilities serve elderly residents and persons with disabilities. Both facilities contain a mix of studio, one bedroom and two bedroom apartments. The BCACHA also manages five scattered site duplexes in Boise with federal aid from HUD.

If a Meridian resident was interested in moving into a public housing unit, they could obtain a public housing application at the BCACHA office or online. Applications must be mailed or hand delivered to the BCACHA office in Boise. The BCACHA website can be interpreted into many languages through the Google Translate tool; however, the public housing application is only available online in English.

There are currently 168 families on the waitlist for public housing units. It is unknown whether any of these families currently reside in Meridian. The average wait time for a public housing unit ranges from three months to two years depending on the unit size requested. Figure II-2 summarizes the demographic characteristics of families on the public housing waitlist. Nearly all households on the waitlist (93%) have a household member with a disability.

**Figure II-2.
BCACHA Public
Housing Unit Waitlist, 2011**

Note:
Demographic data is not provided for all applicants. As such, household characteristics, income and race/ethnicity categories will not sum to 100 percent.

Source:
BC/ACHA.

	Number	Percent
Applicants on Active Waitlist	168	100%
Household Characteristics		
Families with children	-	0%
Elderly families	34	20%
Families with disabilities	156	93%
Income		
Extremely low income	7	4%
Very low income	2	1%
Low income	2	1%
Race/Ethnicity		
American Indian/Alaskan Native	3	2%
Asian	2	1%
Black/African American	10	6%
Native Hawaiian/Pacific Islander	1	1%
White	138	82%
Hispanic	15	9%
Non-Hispanic	114	68%

Limited English Proficiency policy. Title VI of the Civil Rights Act of 1964 is “the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance.”³ Compliance with Title VI requires that recipients of federal dollars provide language assistance to individuals with limited English proficiency (LEP).

³ Information on Title VI and HUD programs can be found here: http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq

Otherwise, “failure to ensure that persons who are limited English proficient (LEP) can effectively participate in, or benefit from, federally assisted programs may violate Title VI’s prohibition against national origin discrimination.”⁴

In 2007, HUD issued guidance to help federal assistance recipients understand their obligations to serving individuals with LEP. HUD suggests federal assistance recipients conduct a four-factor analysis to determine how to best service LEP individuals (explained below); develop a Language Assistance Plan (LAP); and provide appropriate language assistance to LEP individuals.

HUD’s four-factor analysis is a “flexible and fact-dependent” approach to helping federal assistance recipients determine which LEP populations to serve and how to best serve these populations. The four-factor analysis includes identifying the following:

- The number of proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
- The frequency with which LEP persons come in contact with the program;
- The nature and importance of the program, activity or service provided by the program to peoples’ lives; and
- The resources available to the grantee/recipient and costs.

In addition to the four-factor analysis, HUD provides more specific guidance for Title VI compliance. HUD recommends recipients provide written translation of vital documents and oral translation of non-vital documents for LEP languages if the LEP group represents either 5 percent of the total population or 1,000 persons.

HUD recommends that federal assistance recipients develop a language assistance plan (LAP) to describe how they intend to serve LEP individuals in their communities. The BCACHA LAP was last updated in March 2011.

According to the BCACHA’s LAP, the housing authority is committed to quickly connecting LEP individuals to interpreters at no cost to the individual. The BCACHA’s implementation plan does not specify when written interpretation of vital documents will be provided for residents and, although BCACHA will provide translation upon request, vital documents are not available in any language other than English.⁵

During the public comment period for the Boise AI, BCACHA explained that this is because “based on information obtained from the U.S. Census, there are currently no language groups within Ada County that meet either of these thresholds. Once a language group neared or met this threshold, BCACHA would provide translated documents in that language. There are also many documents available through the HUD website translated in to several different languages which can be used as well.:

⁴ IBID.

⁵ For example, BCACHA’s rental assistance applications for the Section 8 and public housing programs do ask residents whether they need assistance with language interpretation.

BCACHA explicitly states that friends or family members of the LEP individual are not valid interpreters. Instead, the BCACHA utilizes bilingual staff members when available and a telephone interpreter service known as the Language Line Services. If an interpreter is needed for a future appointment BCACHA staff will request an interpreter through the agency LEP coordinator who will contact an interpreter and set up the appointment. BCACHA has retained the services of an interpreter on at least 36 occasions over the past calendar year, at BCACHA’s sole expense.

Assisted Housing Units

The following summarizes the city’s inventory of affordable housing units directly owned and operated by the city or constructed with federal subsidies and tax credits.

Assisted units. There are 50 assisted units in Meridian developed from federal subsidies. All units are contained in one building, the James Court Apartments, located in central Meridian. The affordability requirement of this facility is set to expire in 2018.

Figure II-3.
Units with Subsidized Rent, City of Meridian, 2011

Property name	Address	Expiration Date	Total Units	Number of Bedrooms				
				Efficiency	One	Two	Three	Four
James Court Apartments	2190 N. Meridian Rd.	2018	50	0	20	20	10	0
Total			50	0	20	20	10	0

Source: U.S. Department of Housing & Urban Development.

Land Use Policy Review

The following section reviews important pieces of the city’s overall land use policy. This includes a review of how land use decisions are made and approved and the long-range growth vision for the city. Additionally, a HUD checklist was used to conduct a general analysis of the city’s zoning code.

Planning and Zoning Commission. Meridian’s Planning and Zoning Commission is responsible for reviewing all zoning changes and conditional use applications. All five members of the Commission are appointed by the Mayor and confirmed by the City Council.

The Planning and Zoning Commission is responsible for upholding the city’s land use policies and ensuring that all planning decisions support the city’s development goals, objectives, and action items. According to city staff, the commission very rarely recommends denial of housing developments as long as they align with the city’s adopted land use policy plan, and public opposition alone is not a reason for the commission to recommend denial of a proposed project or development.

Comprehensive Plan. During 2010-2011, the city updated its Comprehensive Plan. The process commenced in early 2010 with a town hall meeting and revised goals, objectives, and action items were adopted by the Planning and Zoning Commission in March 2011. The City Council conducted a public hearing and adopted the updated Comprehensive Plan in April 2011. The updated Comprehensive Plan was based upon the concerns and expressions of the community, as well as the Existing Conditions Report that was adopted concurrently as an addendum to the plan.

The Existing Conditions Report includes background information and analysis about the built and natural environment in Meridian in 2010, trends, and a strategic plan for the future.

The Idaho State Code requires that Idaho communities examine a number of community development categories in their Comprehensive Plans including land use; school facilities and transportation; housing; and economic development. The city's Comprehensive Plan examines these elements within the framework of seven key community values:

- Manage growth to achieve high-quality development;
- Enhance Meridian's quality of life for all current and future residents;
- New growth should finance public service expansion;
- Prevent school overcrowding and enhance education services;
- Expand commercial and industrial development;
- Improve transportation; and
- Protect Meridian's self-identity.

The Comprehensive Plan states, "opportunities for housing should be available for all income groups with a mix of housing including modular, ranchettes, townhouses, apartment housing, low-income housing, and mansions. A vibrant community needs a good cross-section of housing and therefore must guard against an abundance of subdivisions in like density and price range. High-density housing must be strategically located to public transportation, community services, and not negatively affect property values."⁶ Related to the goal of offering a diversity of housing types for a great range of choice are several action items listed in the City's Comprehensive Plan. Those action items are as follows:

- Adopt land use designations that will allow for housing opportunities for all income levels.
- Support a variety of residential categories (low, medium, medium-high, and high-density single-family, multi-family, townhouses, duplexes, apartments, condominiums, etc.) for the purpose of providing the City with a range of affordable housing opportunities.
- Require an open housing market for all persons, regardless of protected class, ie: race, sex, age, religion, disability, handicap, family status or ethnic background.
- Ensure that no discriminatory restrictions are imposed by local codes and ordinances.
- Look for incentives to encourage the development of accessible, single-family home designs.
- Provide for a wide diversity of housing types (single-family, mobile homes and multi-family arrangements) and choices between ownership and rental dwelling units for all income groups in a variety of locations suitable for residential development.⁷

The Comprehensive Plan states, "The City of Meridian, as a recipient of the CDBG federal funds, and its partnering non-profits, are obligated to not discriminate in housing or services directly or indirectly on the basis of race, color religion, sex, national origin, age, familial status, or disability."⁸

⁶ City of Meridian Comprehensive Plan, Adopted April 19, 2011: page 36

⁷ City of Meridian Comprehensive Plan, Adopted April 19, 2011, page 53-55

Zoning code review. To evaluate potential fair housing concerns within the city’s zoning code, a “Review of Public Policies and Practices (Zoning and Planning Codes)” form recently circulated by the Los Angeles fair housing office of HUD was utilized. This section poses the questions from this checklist, along with responses about the city’s code.

Does the code definition of “family” have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement? The City’s code defines dwelling or dwelling unit as any structure, or portion thereof, providing independent living facilities for one “family” as herein defined, including provisions for living, sleeping, eating, cooking, and sanitation. The City’s code defines the term family as A) a person living alone or two or more persons related by blood or marriage; B) A group of not more than ten persons who need not be related by blood or marriage living together in a dwelling unit; C) Eight or fewer unrelated mentally and/or physically handicapped or elderly persons residing in a dwelling under staff supervision, provided that no more than two staff members reside in the dwelling at any one time. Thus, group living for individuals with disabilities is allowed at the same level as individuals without disabilities, and group homes are allowed in all residential districts. The code does not discriminate against unrelated individuals with or without disabilities.

The Meridian City Code does not reference Idaho State Code Section 67-6531 which defines a single family dwelling to include “any group residence 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.” However, the Meridian code does restrict the number of physically handicapped or elderly persons living together to eight persons when there is a need for supervision, similar to the State code.

Zoning Regulation Impediment: Does the Code definition of “family” have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement? N/A, see above.

Zoning Regulation Impediment: Does the Code definition of “disability” the same as the Fair Housing Act? The Zoning Code does not provide a definition of “disability,” “disabled” or “handicap.”

Practice Impediment: Does the zoning ordinance restrict housing opportunities for individuals with disabilities and mischaracterize such housing as a “boarding or rooming house” or “hotel”? No. As discussed above, individuals with disabilities may live together in a single-family dwelling unit. The City code does not have a definition for boarding or rooming house.

Practice Impediment: Does the zoning ordinance deny housing opportunities for disability individuals with on site housing supporting services? The definition of family that addresses individuals with disabilities recognizes the need for supervisors, which is linked to on-site support services. However, Meridian’s Code does not go beyond that definition to address support services for individuals with disabilities living together in a single family dwelling unit.

⁸ City of Meridian Comprehensive Plan, Adopted April 19, 2011, page 82

Does the jurisdiction policy allow any number of unrelated persons to reside together, but restrict such occupancy, if the residents are disabled? No. The City code restriction on the number of unrelated persons who may reside together is the same for all residents, regardless of ability.

Does the jurisdiction policy not allow disabled persons to make reasonable modifications or provide reasonable accommodation for disabled people who live in municipal-supplied or managed residential housing? There are currently no municipal supplied or managed residential housing units in Meridian.

Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for disabled applicants and is the hearing only for disabled applicants rather than for all applicants? No. Public hearings are required to obtain a conditional use permit or zoning variance, but the hearing is not specific to persons with disabilities.

Does the zoning ordinance address mixed uses? How are the residential land uses discussed? What standards apply? Yes. The Meridian City Code does encourage mixed use, and there are 8 different future land use designations and 3 zoning districts. Depending on the type of mixed use area envisioned, and the zoning district, land uses are discussed/addressed differently. Some of the mixed use land use designations prohibit residential altogether, some have a minimum number of residential required, and some have a maximum. The emphasis in the City of Meridian Design Manual is on promoting aesthetically pleasing mixed-use developments within neighborhoods and building designs that vertically integrate mixed-use structures and/or horizontal mixed-use forms to create compact developments.

Does the zoning ordinance describe any areas in this jurisdiction as exclusive? No.

Are there exclusions or discussions of limiting housing to any of the following groups: race, color, sex, religion, age, disability, marital status or familial status and/or creed of national origin? No.

Are there any restrictions for Senior Housing in the zoning ordinance? If yes, do the restrictions comply with Federal law on housing for older persons (i.e., solely occupied by persons 62 years of age or older or at least one person 55 years of age and has significant facilities or services to meet the physical or social needs of older people)? No.

Does the zoning ordinance contain any special provisions for making housing accessible to persons with disabilities? No. However, Meridian City Code 1-15-2.A, Fair Housing, states: With available resources, the City will assist all persons who feel they have been discriminated against because of race, color, religion, sex, national origin, disability, or familial status to seek equity under Federal and State laws by filing a complaint with the U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, Compliance Division.

Does the zoning ordinance establish occupancy standards or maximum occupancy limits? Only based on the definition of family which provides for a maximum of 10 unrelated persons in one dwelling unit. No other maximum occupancy for a residential dwelling unit.

Does the zoning ordinance include a discussion of fair housing? The zoning ordinance does not include a discussion of fair housing, but City code 1-15-2 contains the City's Fair Housing Ordinance which

outlines how the City will assist those who feel they have been discriminated against and how the City will promote and publicize the Federal Fair Housing Law.

Describe the minimum standards and amenities required by the ordinance for a multiple family project with respect to handicap parking. Meridian zoning code requires compliance with ADA accessible parking standards.

Does the zoning code distinguish senior citizen housing from other single family residential and multifamily residential uses by the application of a conditional use permit (cup)? No. There is no separate definition for senior citizen housing.

Does the zoning code distinguish handicapped housing from other single family residential and multifamily residential uses by the application of a conditional use permit (cup)? No.

How are “special group residential housing” defined in the jurisdiction zoning code? There is no definition for special group residential housing or similar term. The term family is used, and sometimes Nursing or Residential Care Facility is used to define/classify a use. A Nursing or Residential Care Facility (NAICS Code 623) is defined as the “use of a site for providing assistance to individuals needed to perform the routines of daily life. The use includes, but is not limited to, children’s treatment facility, assisted care, skilled nursing facility, residential care facility and drug and alcohol treatment facility.”

Does the jurisdiction’s planning and building codes presently make specific reference to the accessibility requirements contained in the 1988 amendment to the Fair Housing Act? Is there any provision for monitoring compliance? There is no reference to the Fair Housing Act in the zoning code and no provision for monitoring compliance. Meridian City Code Title 1, Chapter 15 discusses Fair Housing discrimination and complaint procedures. The Meridian Building Code (2009 IBC, IRC) does contain accessibility requirements. The code references American National Standards Institute (ANSI) A 117.1 which contains similar language to accessibility requirements contained in the 1988 amendment to the Fair Housing Act. The city actively enforces its building code to ensure compliance with the Fair Housing Act’s construction and design guidelines.

Other Public Sector Programs and Services

City housing and community development activities. Meridian works to ensure that residents have adequate and affordable housing by partnering with the Ada County Housing Authority (ACHA) and Neighborhood Housing Services (NHS) to provide down payment and closing costs assistance to low and moderate income homebuyers through the City’s Community Development Block Grant program.

COMPASS. The Community Planning Association of Southwest Idaho (COMPASS) serves as the metropolitan planning organization (MPO) for the Boise region. Unlike some states, regional planning organizations and jurisdictions in Idaho are not required to establish and monitor regional and local affordable housing development goals. Instead, COMPASS and other regional planning organizations in the state function as traditional MPOs, whose primary objectives include developing a regional transportation plan that adheres with federal regulations, allocating transportation improvement program funding and serving as a conduit of regional demographic, land use, transportation and GIS data and information.

COMPASS is an active regional planning organization and many of COMPASS's past and current studies encourage the coordination of transportation and land use planning to promote higher density development and transportation access.

Public service provision in LMI areas. The city has served the defined LMI area in a variety of ways to ensure that municipal services are equally provided for throughout the community. The city recently used its CDBG funds for improvements to Centennial Park, located directly south of one of the city's identified LMI Census tracts. The improvements included the installation of a state-of-the-art NEOS 360 electronic play system, a picnic shelter, bike racks and game tables. The city has used CDBG funds to design improvements to sewer and water lines within the LMI area, and those improvements were recently constructed and paid for with city general funds. The main branch of the Meridian Library is located directly north of an identified LMI Census tract, and the Meridian Community Center which offers a wide variety of classes and activities, is located directly south of an identified LMI census tract. The city has used CDBG funds for the design of a segment of the Five Mile Creek Pathway within the LMI Area. CDBG funds will also be used to construct this pathway segment in 2012. This pathway segment will provide an important recreational opportunity as well as an alternative transportation corridor.

In addition to the location of these municipal services, the city has coordinated a Community Clean-Up Day for the past 7 years. This Clean-Up Day has taken place within the downtown core of the city, at the heart of the identified LMI Area. The city's contracted waste collection company, SSC, is one of the primary partners for this important community event, and all the metal recycling money collected during the day is given to a local charity.

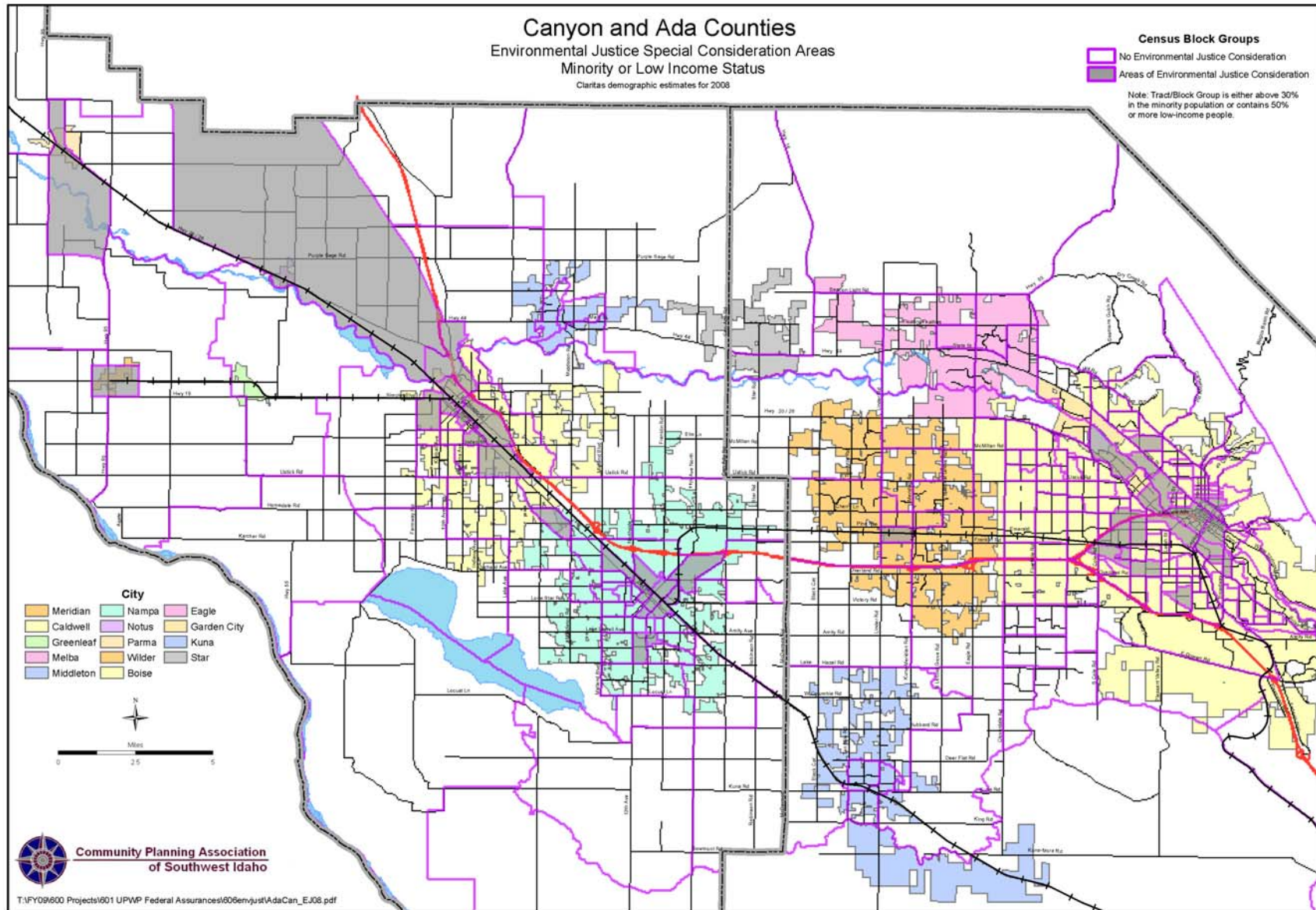
Environmental justice. Title VI of the Civil Rights Act of 1964 requires consideration of the environmental and human health condition in minority and low income communities. Consideration of these areas must include an identification of geographic concentrations of minority and low income areas and analysis of benefits or burdens resulting from activities (e.g., transportation planning) that take place in these communities.

The figure on the following page identifies COMPASS' "areas of environmental justice consideration" in Meridian and the Boise region. Meridian has one Census tract identified as an area of environmental justice (EJ) consideration.

Currently, COMPASS reviews areas of EJ consideration for new projects. COMPASS tries to determine the impacts new projects (e.g., roadway, transit stop) will have on EJ areas, but projects are not funded simply because they fall within an EJ consideration area.⁹

⁹ Currently, the Denver Regional Council of Governments (DRCOG) awards points during the scoring process for transportation projects located in EJ consideration areas.

Figure II-4.
COMPASS Environmental Justice Special Consideration Areas, Cañon and Ada Counties, 2012



Source: COMPASS.

SECTION III.
Fair Lending and Complaints

SECTION III.

Fair Lending and Complaints

This section of the City of Meridian AI is divided into two sections. The first section reviews fair housing complaint data and legal cases related to fair housing violations to highlight the prevalence of and trends in fair housing violations. The second part of this section contains an analysis of mortgage loan and community reinvestment data to detect fair lending concerns.

Fair Housing Complaints

The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status and disability. The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented 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.¹ HUD has the primary authority for enforcing the Fair Housing Act.

The State of Idaho's fair housing act prohibits discrimination on the basis of race, color, sex, religion, national origin and disability. It does not recognize familial status as a protected class. The law is also different from the Federal Fair Housing Act in that it covers providers with two or more units or properties. The state's fair housing law is enforced through the Idaho Human Rights Commission.

The City of Meridian does not have a fair housing ordinance.

Contacts for complaints. Meridian residents who feel that they might have experienced a violation of the Fair Housing Act can contact one or more of the following organizations:

- HUD's Office of Fair Housing and Opportunity (FHEO);
- The Idaho Housing and Finance Association (IHFA);
- The Intermountain Fair Housing Council (IFHC);
- Idaho Legal Aid; and
- The Idaho Human Rights Commission.

Legal Aid and the Idaho Human Rights Commission refer residents who call about fair housing complaints directly to HUD. Similarly, IHFA does not enforce fair housing law and refers complaints or questions to the appropriate service provider.

The city was a sponsor of the City of Boise's fair housing public awareness campaign in April 2011. The campaign was called *Good Neighbors + Fair Housing = Strong Communities* and was intended to increase community awareness and understanding of fair housing rights and responsibilities. Fair

¹ This is a very general description of the Fair Housing Act and the actions and properties covered by the Act. For more detailed information on the Fair Housing Act, please see the full text, which can be found on the U.S. Department of Justice's website, www.usdoj.gov/crt/housing/title8.htm.

housing messages were spread to Treasure Valley residents through radio and television public service announcements, billboards, bus panels, bus benches and community presentations. The initiative was supported through the financial contributions of 15 partners, including Idaho Housing and Finance Association (IHFA), the Idaho Department of Health and Welfare, local banks, Valley Regional Transit and local broadcasting companies.

HUD complaint investigation process. Housing discrimination complaints filed with HUD may be done online at (<http://www.hud.gov/complaints/housediscrim.cfm>), toll free at 1-800-669-9777, or by contacting the Office of Fair Housing and Equal Opportunity in Washington D.C. or Idaho's Fair Housing Hub located in Seattle, Washington.

When HUD receives a complaint, HUD will notify the person who filed the complaint and will normally notify the alleged violator and allow that person to submit a response. The complaint will be investigated to determine whether there has been a violation of the Fair Housing Act.

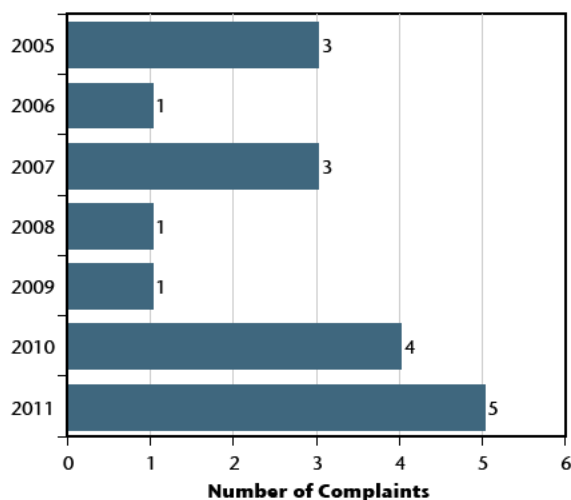
A complaint may be resolved in a number of ways. First, HUD will try to reach an agreement between the two parties involved. A conciliation agreement must protect the filer of the complaint and public interest. If an agreement is signed, HUD will take no further action unless the agreement has been breached. HUD will then recommend that the Attorney General file suit.

If HUD has determined that a state or local agency has the same housing powers ("substantial equivalency") as HUD, they will refer the complaint to that agency and will notify the complainant of the referral. The agency must begin work on the complaint within 30 days or HUD may take it back. If, during the investigation, 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. The State of Idaho and Meridian do not currently have substantial equivalency nor are they seeking such.

HUD complaint trends. BBC obtained data from HUD's Seattle Regional Office of Fair Housing and Equal Opportunity (FHEO) on the number of housing discrimination complaints filed in Meridian from 2005 through 2011. Figure III-1 presents complaints by year. During the six year period, 18 complaints were filed in Meridian. The largest number of annual complaints was five in 2011.

Figure III-1.
Number of Fair Housing Complaints Filed with HUD, City of Meridian, 2005 to 2010

Source:
HUD.



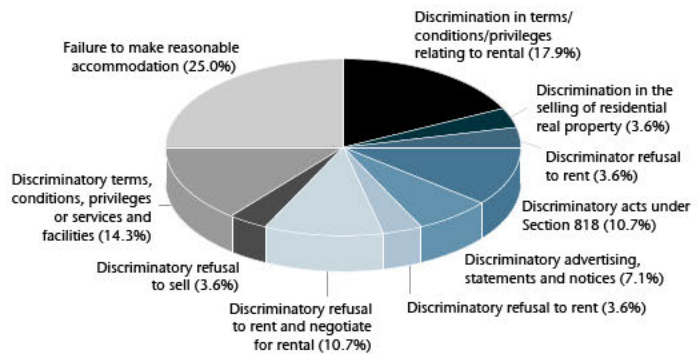
Most complaints filed in Meridian were on the basis of disability status (61%). The remaining complaints were filed on the basis of race (17%), family status (11%) and national origin (6%).²

Two-thirds of all complaints filed in Meridian were filed by Meridian residents. Six of the 18 complaints filed in Meridian between 2005 and 2011 were filed by individuals from other communities looking for housing in Meridian, including Boise.

The most common violation cited in complaints was failure to make reasonable accommodations (25%).³ An additional 18 percent of complaints were filed because of discrimination in the terms, conditions and privileges relating to a rental property.

Figure III-2.
Issues Cited in Complaints,
City of Meridian, 2005 to 2010

Source:
HUD.



Of the 18 cases filed in Meridian, 11 cases were closed. Seven cases are still open. These cases were all filed in 2010 and 2011. The largest proportion of cases (64%) closed following a successful conciliation or settlement. The remaining cases (36%) closed after HUD found “no reasonable cause to believe that housing discrimination occurred.”⁴

IFHC complaint process. The Intermountain Fair Housing Council (IFHC) “is a nonprofit organization that promotes fair housing practice for housing consumers and housing providers throughout Idaho.”⁵ The IFHC is involved in fair housing education, compliance monitoring, enforcement activities (e.g., complaint investigation, testing, complaint filing) and mediation.

When IFHC receives a complaint, they collect all information from the complainant that supports the complaint (e.g. doctor note) and determine whether the complaint meets four important factors to determine whether a complaint is valid:

- The complaint occurred within the last year;
- The action seemed to occur because the person fell within a protected class;
- The individual that committed the potential violation is subject to Fair Housing Act; and
- The complaint appears to be a prohibitive activity.

² One case was filed by a relief agency. No basis for discrimination was provided.

³ Complainants are allowed to cite more than one reason for discrimination when filing a complaint. For example, a complainant may cite discriminatory terms, conditions, privileges of services and facilities, as well as discrimination in terms/conditions/privileges relating to rental.

⁴ For a definition of no cause determination, please visit: http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/complaint-process

⁵ For more information on the Intermountain Fair Housing Council, please visit: <http://ifhcidaho.org/about.html>.

If the complaint requires additional facts to prove its validity, IFHC will conduct extra research and investigation (e.g., testing, check property tax records with the Assessor's office, gather additional documentation). Once sufficient information has been gathered, IFHC will advise the client on next steps. Next steps could include calling HUD directly to file a complaint by phone or IFHC staff can help individuals fill out complaint forms to ensure the complaint has strong documentation. IFHC faxes the complaint directly to HUD and also sends the complaint via registered mail. If IFHC has invested sufficient administrative resources into the complaint filing, they co-file a complaint. IFHC believes co-filing demonstrates to FHEO that there is strong merit to the case.

Legal Cases

As part of the fair housing analysis, legal cases occurring in the past ten years were reviewed to determine significant fair housing issues and trends in Meridian and the Boise region. None of these lawsuits occurred in Meridian; however, it is important to include them in the analysis to understand the types of cases that could occur in Meridian. Cases were found on websites maintained by the Department of Justice, the National Fair Housing Advocate and HUD. In many cases, text was borrowed directly from the legal briefs.

An analysis of statewide complaints completed by BBC in summer 2011 found that the vast majority of fair housing legal cases in the State of Idaho occurred in Ada County and were related to developers, builders, engineers and/or architects failing to comply with the accessibility requirements of the federal Fair Housing Act and the Americans with Disabilities Act (ADA).

Disability.

United States v. Canal Street Apartments, et al. In 1998, the IFHC filed a complaint with HUD alleging that the Canal Street Apartments located in Boise, Idaho frustrated the IFHC's mission of eliminating discrimination by failing to construct and design the complex so that the public use and common use portions are readily accessible to and usable by individuals with disabilities and ground floor units contain features of adaptive design.⁶ Upon finding reasonable cause for discrimination based on disability, HUD referred the case to the DOJ.

In September 2002, the court filed a consent decree requiring the defendants to retrofit the ground floor units and public and common areas to make them accessible to persons with disabilities; submit to periodic inspections and record-keeping; and pay \$3,300 in monetary damages to IFHC, \$5,000 to the Accessibility Improvement Program (AIP) of the Idaho Housing and Finance Association to promote handicap accessible housing construction and fair housing in the City of Boise and Ada County area, and a \$6,500 civil penalty. The five-year consent order also requires the defendants notify HUD if they again design or construct multifamily dwellings and provide a written statement from any architect involved with the project that the plans include design specifications that comply with the requirements of FHA Accessibility Guidelines.

⁶ In this case, adaptive design included: (i) doors sufficiently wide to allow passage into and within the unit by persons in wheelchairs; specifically including: doors to the bedrooms; doors to the bathrooms; doors to the walk-in closets; doors to the patio; (ii) threshold at the exterior primary entrance low enough to allow entry by persons in wheelchairs; (iii) bathroom floor space sufficiently clear for an individual in a wheelchair to enter and close the door; (iv) providing reinforcement in the walls at the tub and water closet to permit the later installation of grab bars.

United States v. Pacific Northwest Electric, Inc., et al. In January, 2001 the United States filed a complaint alleging that the defendants developers Walter T. Sigmont and Wirt Edmonds, Pacific Northwest Electric, Inc., Edmonds Construction Co., Inc., and architects Teal Whitworth Architects, P.A. and Capstone, Inc. located in Boise, Idaho discriminated on the basis of disability by failing to design and construct five Boise apartment complexes in accordance with the FHA's accessibility requirements for new multifamily housing. The five Boise complexes that were the subject of the suit are Grayling Place, Jade Village, Imperial Court, Eagleson Park and Harborview Station (formerly known as Lawton Apartments). Specifically, the defendants failed to design the apartment complexes so that the public and common areas are readily accessible to and usable by individuals with disabilities; all doors within the 72 ground floor units are sufficiently wide to allow passage by persons with disabilities who use wheelchairs; and the 72 ground floor units contain the features of adaptive design.⁷

In October, 2003, the court entered a consent decree, which required the defendants to retrofit the complexes by, among other things: removing steps; reconfiguring kitchens and bathrooms to provide added maneuvering space; widening doorways; leveling sidewalks; and adding accessible parking and curb ramps at an estimated cost of approximately \$300,000. In addition, the defendants were required to pay damages in the amount of \$29,000 to persons harmed by the lack of accessible features at the complexes, pay \$5,000 in damages to the IFHC, and ensure that any new construction complies with the FHA. The consent decree remained in effect for two years.

United States v. Thomas Development Co., et al. In February, 2002 the United States filed a complaint alleging that Thompson Development Co. and affiliated companies (defendants) engaged in a pattern or practice of discrimination on the basis of disability by failing to design and construct the ground floor units and public /common use areas in compliance with the accessibility requirements of the FHA. The defendants were alleged to commit these violations at 17 apartment complexes located throughout Southern Idaho in the cities of Boise, Meridian, Nampa, Shelly, Rexburg, Caldwell, Rigby, Lewiston and Jerome. The complaint also alleged that some of the defendants retaliated against a tenant family at one of the complexes by attempting to evict the family after one of the family members requested a reasonable accommodation for their disability.

In March, 2005, the court entered a consent order, which included injunctive relief and monetary payments totaling \$125,000. The consent order remained in effect for three years.

Garcia v. Brockway. In May 2003, Noll Garcia (plaintiff) filed a complaint against the original owner/developer and designer of his apartment building in Boise, Idaho. The complaint alleged a failure to accommodate disabilities as mandated by the FHA. Mr. Garcia is disabled and uses a wheelchair for mobility and filed a complaint because the apartment complex he was lacked curb cuts from the parking lot to the sidewalk, didn't have a ramp to the front entrance door, and the doorways were too narrow to allow clear passage of his wheelchair. Mr. Garcia requested that management make appropriate accessibility improvements, which were ignored, as was his request that management build a ramp to his door or that he be relocated to a more accessible unit. In addition, Mr. Garcia sued the original builder and architect (Brockway and Robert Stewart, respectively), and the current owners and management (the Zavoshy defendants).

⁷ See footnote 2 for qualifications of "adaptive design."

The defendants (Brockway and Stewart) argued that because they no longer owned the building (which they sold in 1994), their liability was time-barred by the statute of limitations in the FHA. Thus, the plaintiff's complaint would have had to been filed within two years following construction of the apartment building in 1993. The plaintiff countered, arguing that the failure to remodel the apartments constituted a continuing violation and that the statute of limitations take effect upon discovery of the alleged violations. Mr. Garcia also claimed that failure to make modifications constituted new violations.

The court ruled that the continuing accessibility issues were an effect of a prior discriminatory act but not a continuing violation. The argument that the two-year statute of limitations should begin at discovery of a violation was deemed unworkable, as a developer would be liable for these violations indefinitely in spite of his or her ownership of the complex. Finally, the original developer was not found to be liable for refusal to make modifications while current management company was at fault. The defendant still had a remedy under the FHA with building owners, but his motion against the developers was dismissed. Claims against the current owners and management were settled out of court.

United States v. S-16 Limited Partnership, et al. In April, 2003, the United States filed a complaint alleging that the owners and developers of the 254-unit Village at Columbia apartment complex in Boise, Idaho and the architects and engineering firm involved in its design failed to design and construct the complex in compliance with the accessibility requirements of the FHA. Specifically, the defendants failed to design the apartment complexes so that the public and common areas are readily accessible to and usable by individuals with disabilities; all doors within the 76 ground floor units are sufficiently wide to allow passage by persons with disabilities who use wheelchairs; and the 76 ground floor units contain the features of adaptive design.⁸

In March, 2005, the court entered the consent order requiring the defendants to retrofit the common use areas of the complex and 76 ground-floor apartments. The order also required defendants to pay \$2,000 in damages to the IFHC, the original HUD complainant in the case, and to establish a fund of \$40,000 to compensate victims of defendants' discriminatory practices. In addition, the order included a general injunction against future discrimination; a requirement that defendants inform HUD of future development and design work in which they become involved and obtain statements that design plans comply with the FHA; a mandate that defendants require all supervisory employees and agents to participate in fair housing training and certify that they have read the order; post signs describing their policy of nondiscrimination in housing; and meet reporting and record-keeping obligations. The consent order remained in effect for three years.

Familial status.

United States v. Blue Meadows Apartments, et al. In July, 1995 Blue Meadows Limited Partnership, the owner of Blue Meadows Apartments in Boise, Idaho (defendant) stated, adopted, and enforced a policy that imposed a limitation on the use of facilities by persons under the age of 18 years. Specifically, those rules required all occupants under the age of 18 years to be supervised whenever they were outside of their apartments; the rules also prohibited all people under the age of 18 years from using or occupying any of the common areas after 10 p.m., irrespective of adult or parental supervision. Defendants incorporated these rules into an addendum to the lease that tenants

⁸ See footnote 2 for qualifications of "adaptive design."

were required to sign. Several residents of Blue Meadows that had children under the age of 18 filed complaints with HUD in 1999 and 2000. Upon finding reason for discrimination based on family status HUD referred the case to the DOJ for resolution.

In September, 2002, the court entered a consent decree where the defendants agreed to delete the current restriction on persons under 17 from using the pool unless accompanied by a parent; limit any future age restrictions governing unaccompanied children using the pool to those under age 13; and refrain from instituting any other rules that restrict the use of common areas at by persons under 18, except those that apply to all persons, regardless of age. Defendants were also required to pay one of the plaintiffs \$1,200 in damages.

Religion.

Intermountain Fair Housing Council v. Boise Rescue Mission Ministries. The Rescue Mission is an Idaho nonprofit funded through charitable donations from businesses, churches and the general public. The Rescue Mission operates two facilities in Boise. There were recently two cases filed against the Rescue Mission on the basis of religion.

- **Case #1:** Plaintiff Richard Chinn was periodically homeless during the years 2005 and 2006 and a guest of the homeless shelter located at the River of Life Facility. During his stays at the shelter, he had no other place to stay and intended to remain in the shelter in excess of several months. Chinn asserts that he was told by shelter staff that he would be required to participate in Christian religious activities such as chapel services in order to reside and eat meals at the shelter. He observed that guests of the shelter who did not attend chapel services were either required to wait in the dining room or were not permitted to enter the shelter until chapel services were completed. Chinn found the practices of the shelter to be coercive, unpleasant, embarrassing, and offensive to his religion. He did, however, participate in the religious services out of fear that if he did not participate, he would be denied housing and other services.
- **Case #2:** In addition to the homeless shelter, the Rescue Mission also provides a New Life Discipleship/Recovery Program, which is an intensive, one-year Christian-based residential recovery program for individuals with drug or alcohol dependency. In October 2005, Plaintiff Cowles was in jail on drug-related criminal convictions. Cowles contacted the Rescue Mission and requested that she be admitted into the Discipleship Program, stating that she was "focused on changing my life through God and spiritual growth," and that she is "desperately looking to fill this void in my life with spirituality and not drugs." Following admittance to the program, Cowles was required to participate in religious activities Cowles was upset at being forced to adopt the Christian religion. When Cowles requested that she be allowed to change to a non-religious program, she was put on "30-day restriction" during which all her telephone calls with her attorney were monitored by Program staff and she was not allowed to participate in other limited activities that she previously had been allowed. Eventually, Discipleship Program staff wrote a letter to the judge presiding over Cowles' criminal case and informed the judge that Cowles "struggled with the Christian based program that was offered." Staff recommended to the judge that Cowles be given an opportunity to complete a non-faith-based program to allow her to "better focus on her recovery without the confliction of her beliefs."

Both cases were resolved recently in appellate court. The court found that since the Boise Rescue Mission is not a “dwelling,” it is not subject to the requirements of the Fair Housing Act. The court also concluded that the religious practice requirements are protected by the Free Exercise Clause of the First Amendment.

Fair Lending Analysis

This section analyzes fair lending conditions in the City of Meridian using residential mortgage lending data from 2010 (the latest data available at the time this report was prepared). Community Reinvestment Act (CRA) ratings and Home Mortgage Disclosure Act (HMDA) data are commonly used in AIs to examine fair lending practices within a jurisdiction. As of 2004, HMDA data contain interest rates of high cost loans, which allows an analysis of high cost (subprime) lending patterns.

CRA review. The CRA requires that financial institutions progressively seek to enhance community development within the area they serve. On a regular basis, financial institutions submit information about mortgage loan applications as well as materials documenting their community development activity. The records are reviewed to determine if the institution satisfied CRA requirements. The assessment includes a review of records as related to the following:

- Commitment to evaluating and servicing community credit needs;
- Offering and marketing various credit programs;
- Record of opening and closing of offices;
- Discrimination and other illegal credit practices; and
- Community development initiatives.

The data are evaluated and a rating for each institution is determined. Ratings for institutions range from substantial noncompliance in meeting credit needs to an outstanding record of meeting community needs.

There are 24 banks with headquarters in Idaho; however, none of those banks are located in Meridian.⁹ The Farmers and Merchants State Bank was located in Meridian, but moved its headquarters to Boise. Its last CRA rating while headquartered in Meridian was in 2002, and the bank received a “Satisfactory” rating.

HMDA data analysis. HMDA data are widely used to detect evidence of discrimination in mortgage lending. In fact, concern about discriminatory lending practices in the 1970s led to the requirement for financial institutions to collect and report HMDA data. The variables contained in the HMDA dataset have expanded over time, allowing for more comprehensive analyses and better results. However, despite expansions in the data reported, HMDA analyses remain limited because of the information that is *not* reported.

⁹ 2011 State of Idaho AI completed by BBC Research & Consulting.

As such, studies of lending disparities that use HMDA data carry a similar caveat: HMDA data can be used to determine disparities in loan originations and interest rates among borrowers of different races, ethnicities, genders, and location of the property they hope to own. The data can also be used to explain many of the reasons for any lending disparities (e.g., poor credit history). Yet HMDA data do not contain all of the factors that are evaluated by lending institutions when they decide to make a loan to a borrower. Basically, the data provide *a lot* of information about the lending decision—but *not all* of the information.

Since 2004, HMDA data include the interest rates on higher-priced mortgage loans. This allows examinations of disparities in high-cost, including subprime, loans among different racial and ethnic groups. It is important to remember that subprime loans are not always predatory or suggest fair lending issues, and that the numerous factors that can make a loan “predatory” are not adequately represented in available data. Therefore, actual predatory practices cannot be identified through HMDA data analysis. However, the data analysis can be used to identify where additional scrutiny is warranted, and how public education and outreach efforts should be targeted.

HMDA data report several types of loans. These include loans used to purchase homes, loans to make home improvements and refinancing of existing mortgage loans, as defined below.

- **Home purchase loan.** A home purchase loan is any loan secured by and made for the purpose of purchasing a housing unit.
- **Home improvement loan.** A home improvement loan is used, at least in part, for repairing, rehabilitating, remodeling, or improving a housing unit or the real property on which the unit is located.
- **Refinancing.** Refinancing is any dwelling-secured loan that replaces and satisfies another dwelling-secured loan to the same borrower. The purpose for which a loan is refinanced is not relevant for HMDA purposes.

The HMDA data are separated into two primary loan categories: conventional loans and government-guaranteed loans. Government-guaranteed loans are those insured by the Federal Housing Administration and the Veterans Administration.

This section uses the analysis of 2010 HMDA data to examine:

- The geographic areas in Meridian where high-cost lending and loan denials are concentrated, and the correlation of these areas with concentrations of minority and low income households; and
- Disparities in high-cost lending and loan denials across different racial and ethnic groups.

Methodology notes. There are two important methodological notes to highlight as part of this HMDA analysis:

- Only loan applications for owner-occupied properties are analyzed.
- Loan applications are analyzed at the Census tract level. Aggregating Census tract data to jurisdictional boundaries may result in loan applications outside jurisdictional boundaries being included in community-level analysis.

Types of loans. In 2010, there were 6,196 loan applications filed in the City of Meridian.¹⁰ Figure III-4 presents the distribution of loan applications by the types of loans applicants applied for in 2010. Most loans in the city were for conventional loans (67%).

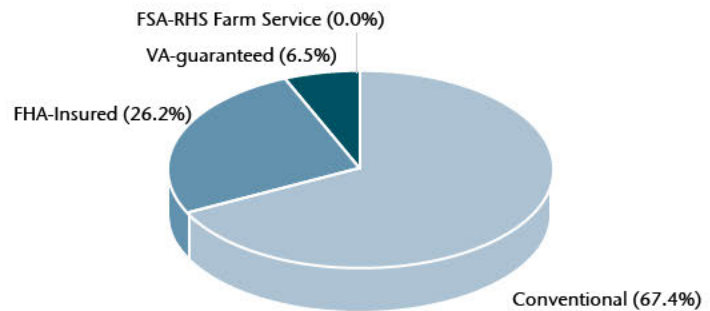
Figure III-4.
Types of Loan Applications,
City of Meridian, 2010

Note:

Less than 1 percent of loan applications were for FSA or Rural Housing loans. These loans are not included in this Figure. The percentages in this Figure will not add to 100 percent.

Source:

Home Mortgage Disclosure Act, 2010.



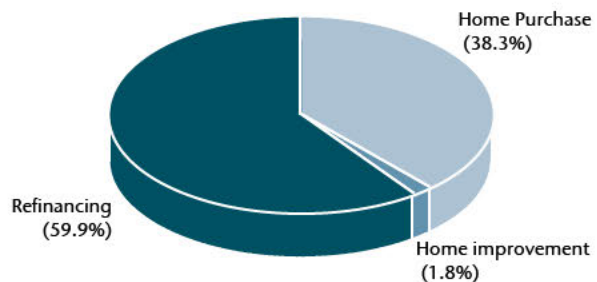
Twenty-six percent of loans in 2010 were for Federal Housing Administration (FHA) loans. Meridian residents were slightly more likely to apply for FHA-insured loans in 2010 than Boise (22%) and Ada County residents (23%).

Purpose of loan applications. When Meridian residents applied for mortgage loans in 2010, 60 percent of loan applicants applied for a mortgage refinance and 38 percent of applicants applied for a loan to purchase a home.

Figure III-5.
Purpose of Loan Applications,
City of Meridian, 2010

Source:

Home Mortgage Disclosure Act, 2010.

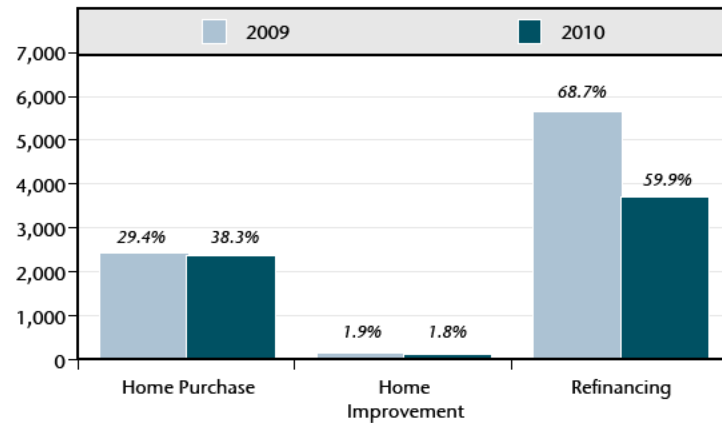


¹⁰ These loans were filed in Census tracts that overlap with city boundaries.

The purpose of loan applications by Meridian residents changed between 2009 and 2010. In 2009, 69 percent of all loan applicants sought loans for a mortgage refinance and 29 percent applied for a loan to purchase a home. This change is due to a larger number of Meridian residents applying for refinances in 2009 compared to 2010. This could suggest that the Meridian housing market has stabilized a bit, as homeowners are less urgent to restructure existing home loans.

Figure III-6.
Purpose of Loan Applications,
City of Meridian, 2009 and 2010

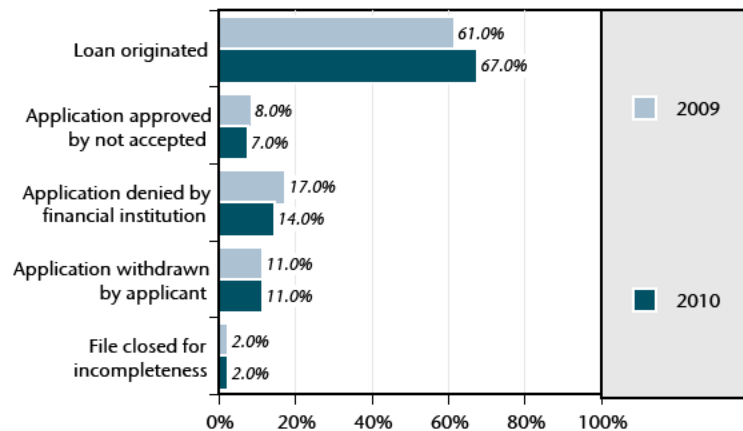
Source:
Home Mortgage Disclosure Act, 2009 and 2010.



Action taken on loan applications. Sixty-seven percent of loan applications submitted by Meridian residents in 2010 originated, while 14 percent were denied. The city's loan denial rate decreased slightly between 2009 and 2010; subsequently, its loan origination rate increased.

Figure III-7.
Action Taken on Loan
Applications, City of
Meridian, 2009 and 2010

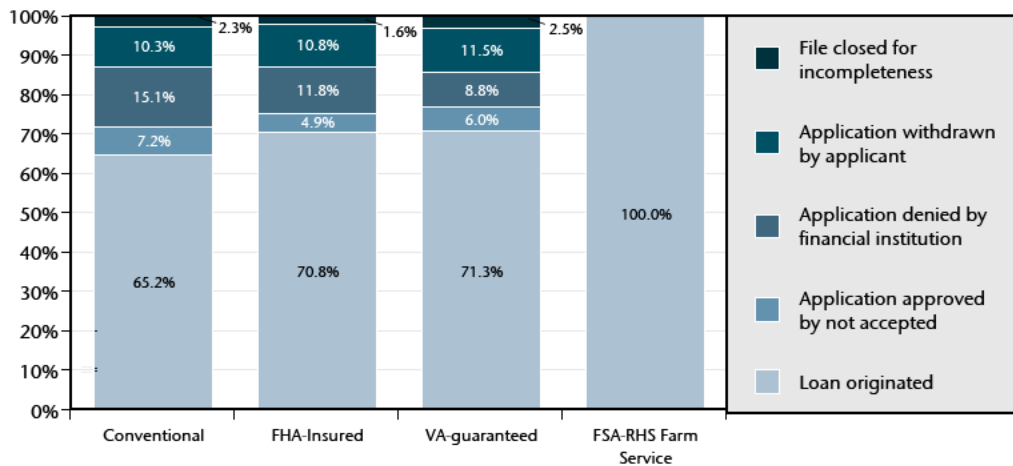
Source:
Home Mortgage Disclosure Act, 2009
and 2010.



Meridian's 2010 denial rate was slightly lower than denial rates experienced by Boise (16%) loan applicants. Ada County residents overall had a 15 percent loan denial rate.

Figure III-8 compares loan outcome by loan type. Meridian residents primarily applied for conventional, FHA-insured and VA-guaranteed loan products. Conventional loan products had the highest denial rate at 15 percent, while VA-guaranteed loans had the lowest denial rate at 9 percent. FHA-insured loans had a denial rate of 12 percent.

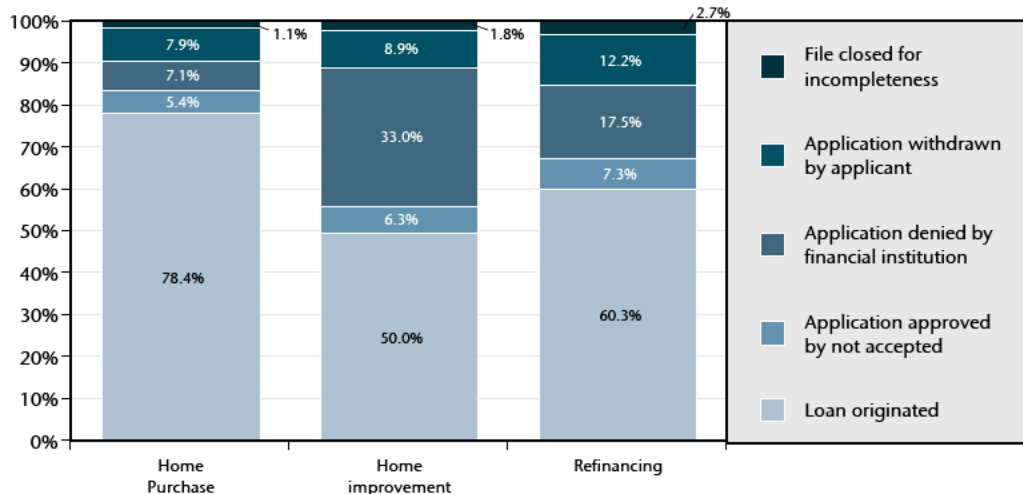
Figure III-8.
Action Taken on Loan Applications by Loan Type, City of Meridian, 2010



Source: Home Mortgage Disclosure Act, 2010.

Figure III-9 compares loan outcome by loan purpose. Home improvement loans have the highest denial rate at 33 percent. In fact, only one in every two home improvement loan applications submitted by a Meridian resident was approved in 2010. Home refinance loans had a denial rate of 18 percent, and only 7 percent of home purchase loans were denied by the lending institution.

Figure III-9.
Action Taken on Loan Applications by Loan Purpose, City of Meridian, 2010



Source: Home Mortgage Disclosure Act, 2010.

Seventy-eight percent of Meridian’s home purchase loans were approved in 2010. This is good news for the city’s housing market, as it demonstrates that the city has qualified buyers waiting to purchase homes. Meridian had a higher home purchase loan origination rate in 2010 than neighboring Boise (73%) and the county overall (75%).

Denial rates by race and ethnicity. When applicants identified their race and ethnicity as part of their mortgage application, they most often identified themselves as racially white (96%) and ethnically non-Hispanic (97%).¹¹

Figure III-10 presents loan outcomes by race and ethnicity. Denial rates were highest for applicants who were Black/African American (31%) and Native Hawaiian (19%). The city’s Asian loan applicants had the lowest denial rate in the city (10%).

As the last part of Figure II-10 shows, the most extreme disparity in lending occurs between African Americans and Whites: White applicants had loan origination rates that were 26 percentage points higher than African American applicants’. Similarly, African American applicants had denial rates that were 18 percentage points higher than White applicants’. It is acknowledged that African Americans comprised less than 1 percent of all loan applicants in the city in 2010. There is very little lending disparity between the city’s Hispanic and non-Hispanic residents.

Figure III-10.
Action Taken on Loan Applications by Race and Ethnicity, City of Meridian, 2010

	Percent of loans	Loan originated	Application approved but not accepted	Application denied by financial institution	Application withdrawn by applicant	File closed for incompleteness
Race						
American Indian or Alaska Native	0.4%	75.0%	8.3%	8.3%	8.3%	0.0%
Asian	2.2%	66.9%	9.4%	10.2%	11.8%	1.6%
Black or African American	0.5%	42.3%	3.8%	30.8%	19.2%	3.8%
Native Hawaiian or Other	0.5%	69.2%	7.7%	19.2%	3.8%	0.0%
White	96.4%	68.6%	6.2%	13.2%	10.0%	1.9%
Ethnicity						
Hispanic or Latino	3.0%	67.5%	2.4%	15.4%	11.8%	3.0%
Not Hispanic or Latino	97.0%	68.3%	6.5%	13.2%	10.1%	1.9%
Racial and Ethnic differences between...						
Non-White/White		-3.6%	2.1%	0.6%	1.3%	-0.4%
African American/White		-26.3%	-2.4%	17.6%	9.2%	2.0%
Hispanic/Non-Hispanic		-0.9%	-4.1%	2.2%	1.7%	1.1%

Note: Nine percent of applicants did not identify their race and 9 percent did not identify their ethnicity in their loan application. This analysis only includes applicants that identified their race and ethnicity.

Source: Home Mortgage Disclosure Act, 2010.

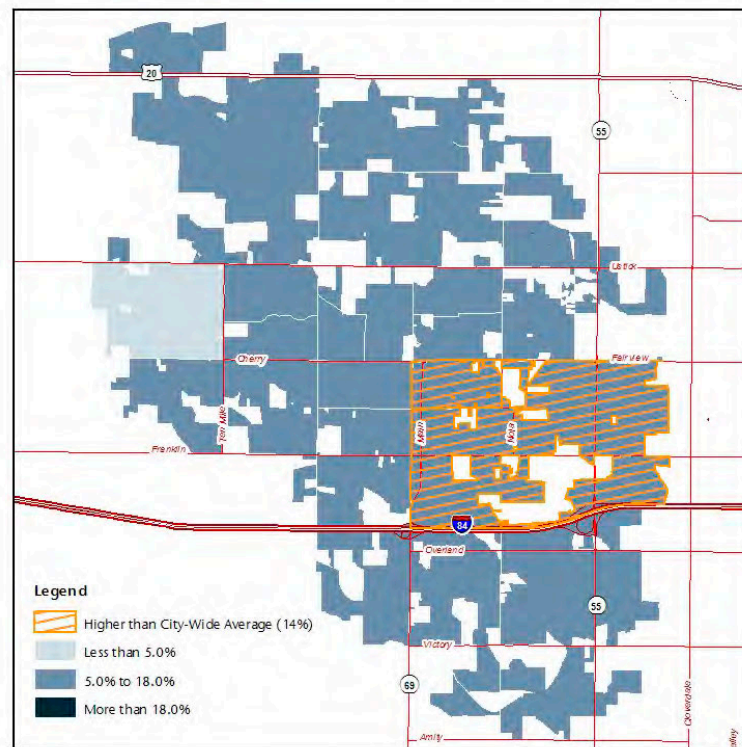
¹¹ Nine percent of applicants did not provide their racial or ethnic information.

Denial rate by race/ethnicity by census tract. A further examination of loan approvals by race/ethnicity is provided in the maps that follow. Figures III-11 and III-12 overlay Census tracts containing loan denial rates above the city’s 14 percent denial rate with the city’s racial and ethnic concentration maps. While there are no racial or ethnic concentrations in the city, the city does have LMI Census tract. One of those tract—103.22—has a higher denial rate than the city overall (16%), as does the adjacent tract, 103.21 (17%). However, the denial rates are not significantly different in these tracts than the city’s denial rate overall.

Figure III-11.
Census Tracts with Higher than City-Wide Average Denials by Percent Non-White, City of Meridian 2010

Note:
 The denial rate for all loans in the city overall was 14 percent.

Source:
 Home Mortgage Disclosure Act (HMDA), 2010 and 2010 Census.



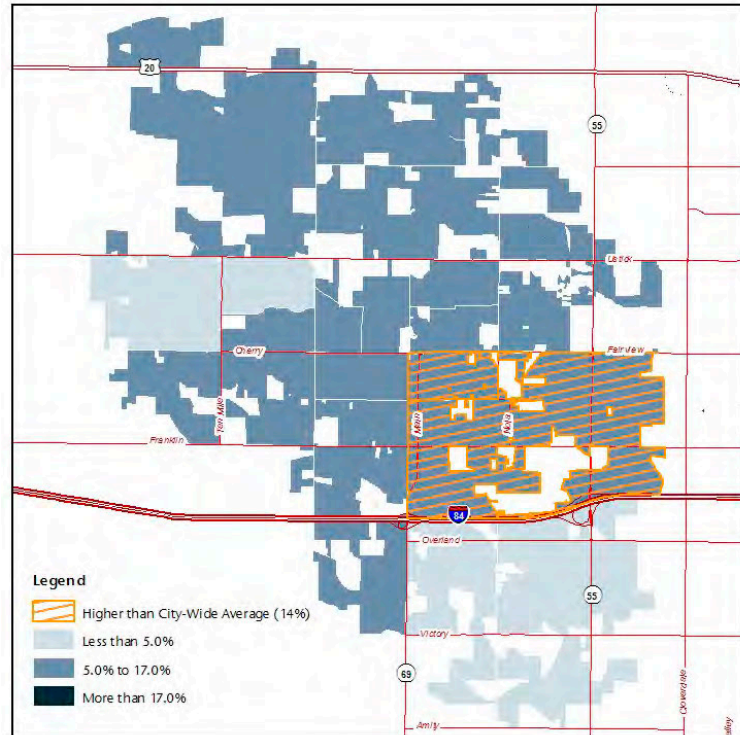
**Figure III-12.
Census Tracts with Higher
than City-Wide Average
Denials by Percent Hispanic,
City of Meridian, 2010**

Note:

The denial rate for all loans in the city overall was 14 percent.

Source:

Home Mortgage Disclosure Act (HMDA), 2010 and 2010 Census.



Applications submitted for loans in these two Census tracts comprise less than 10 percent of all loan applications submitted in the city. Loan applications submitted in these two tracts resembled loans for the city overall by purpose; however, loans applicants were more likely to apply for an FHA-insured loan in this portion of the city (35%) compared to the city overall (26%). Loan applicants applying for loans in these two tracts were slightly more likely to be denied loans for both conventional (18%) and FHA-insured loans (14%).

Subprime analysis. Less than 1 percent (17 of 4,154) of Meridian’s originated loans were considered subprime in 2010. There was no racial or ethnic disparity in subprime lending in 2010, indicating that subprime loans were not targeted to the city’s racial or ethnic minorities. For example, nearly all subprime loan recipients that identified their ethnicity were non-Hispanic.¹² Additionally, subprime loans in Meridian are geographically dispersed, indicating that low income residents in the city’s lowest income Census tracts were not targeted for subprime loans.

¹² None of the subprime loan recipients provided racial information.

SECTION IV.

Public Input and Participation

This section discusses input from citizens, stakeholders and service providers regarding the development of the city’s AI. Public input was gathered in the following ways:

- A resident survey was distributed online and on paper between November 16th and December 15th of 2011—330 residents participants in the survey;
- An online stakeholder survey was promoted by city staff and BBC in fall 2011—15 housing, fair housing and social service professionals responded; and
- A focus group and in-depth interviews with service providers and housing developers were conducted in the fall and winter of 2011-12—11 individuals participated.

The city also held a public comment period for the AI. No comments were received.

The city’s AI was completed in conjunction with its 2012-2016 Consolidated Plan. All public input components of the Consolidated Plan and the AI included questions pertinent to both studies. This insured maximum resident and stakeholder input into both processes.

Resident Survey

This section presents the results from the resident survey.

Distribution strategy. A variety of organizations and mediums were used to publicize and distribute the resident survey.

They are summarized in Figure III-1. Additionally, the resident survey was publicized in utility bills mailed to Meridian residents.

The resident survey was publicly promoted through the city’s website and public schools, as well as distributed through nonprofit organizations. As such, the survey is not meant to be interpreted as a statistically valid survey of all Meridian residents. Rather, the survey reflects the experiences and opinions of residents who were interested in responding to questions about their housing experiences.

Figure IV-1.
Survey Distribution, City of Meridian, 2011

Organizations Contacted	Other Distribution Mediums
Ada County Boys and Girls Club	City of Meridian website
Boise City/Ada County Housing Authority	City of Meridian electronic newsletter
Chief Joseph Elementary School	City of Meridian Facebook page
City of Meridian City Clerk	City of Meridian Twitter page
City of Meridian Planning Department	HOA email distribution lists
El Ada Community Action Partnership	Press release to local newspapers
Friends in Action	Public school email list
Idaho Leagal Aid Services	
Idaho Office for Refugees	
Intermountain Fair Housing Council	
Linder Elementary School	
Meridian Community Center	
Meridian Elementary School	
Meridian Food Bank	
Meridian High School	
Meridian Library	
Meridian Middle School	
Meridian Senior Center	
Terry Reilly Health Services	
United Way of Treasure Valley	

Source: BBC Research & Consulting and City of Meridian.

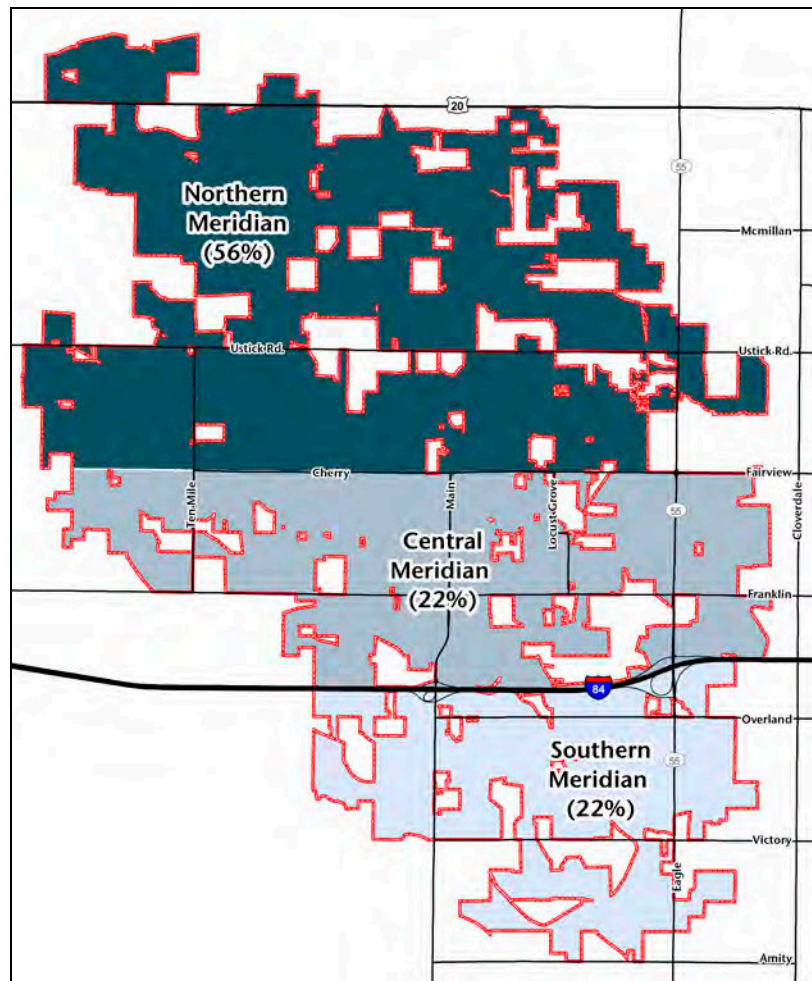
Demographic profile. The resident survey included several demographic and socioeconomic questions. Where possible, comparisons are made between survey respondent demographics and those for the city overall.

Geography. Figure IV-2 displays survey respondents' place of residence in Meridian. The largest proportion of survey respondents live in North Meridian, defined as the area of the city north of Fairview Avenue/Cherry Lane. The remaining 44 percent of respondents were equally split between South Meridian (south of the Interstate 84) and Downtown/Central Meridian.

**Figure IV-2.
Residence of Survey
Respondents, City of
Meridian, 2011**

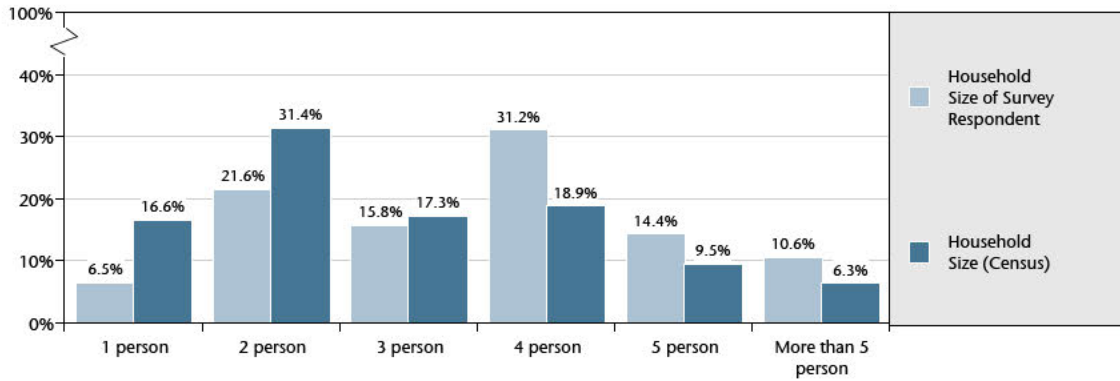
Note:
n=329.

Source:
Meridian Resident Survey, 2011 and
BBC Research & Consulting.



Household profile. Figure IV-3 compares the household size of survey respondents to the size of all households in Meridian. On average, survey respondents have larger households than residents in the city overall. The vast majority of survey respondents have a household size of four (31%).

Figure IV-3.
Household Size of Survey Respondent Compared with Household Size for Meridian, 2011



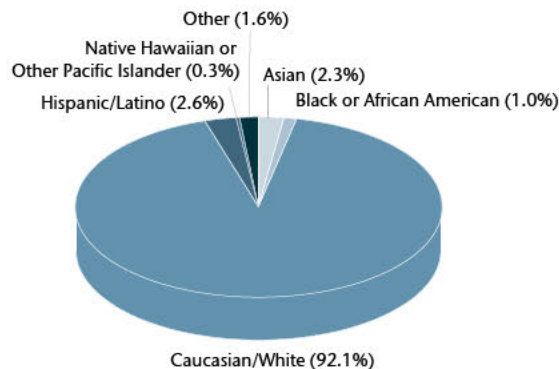
Note: n=292; According to the 2010 ACS, the average household size in Meridian is 2.89.

Source: Meridian Resident Survey, 2011 and 2010 U.S. Census.

Survey participants were asked to identify the language most commonly spoken in their home. Most respondents speak English (98%) at home.¹

Race and ethnicity. Figure IV-4 presents the race/ethnicity of survey respondents. Ninety-two percent of survey respondents identified themselves as racially White. Approximately 3 percent of survey respondents identified themselves as Hispanic. Compared to the proportion of Hispanics in the city (7%), a smaller proportion of Hispanics responded to the resident survey.

Figure IV-4.
Race/Ethnicity of Survey Respondents, City of Meridian, 2011



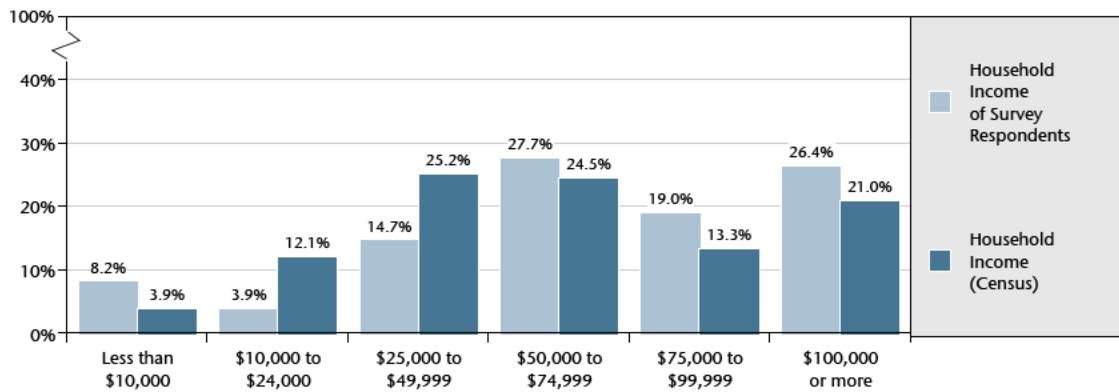
Note: n=305.

Source: Meridian Resident Survey, 2011.

¹ n=299.

Income. Figure IV-5 compares the household income distribution of survey participants with the distribution of the city overall. The largest proportion of survey participants earn between \$50,000 and \$75,000 per year (28%), which is close to the proportion those households represent in the city (24%). Overall, the survey has strong participation from the city's highest earning households. It should be noted that many survey respondents chose not to disclose their household's income.

**Figure IV-5.
Household Income of Survey Respondents
Compared with the Overall Household Income for Meridian, 2011**

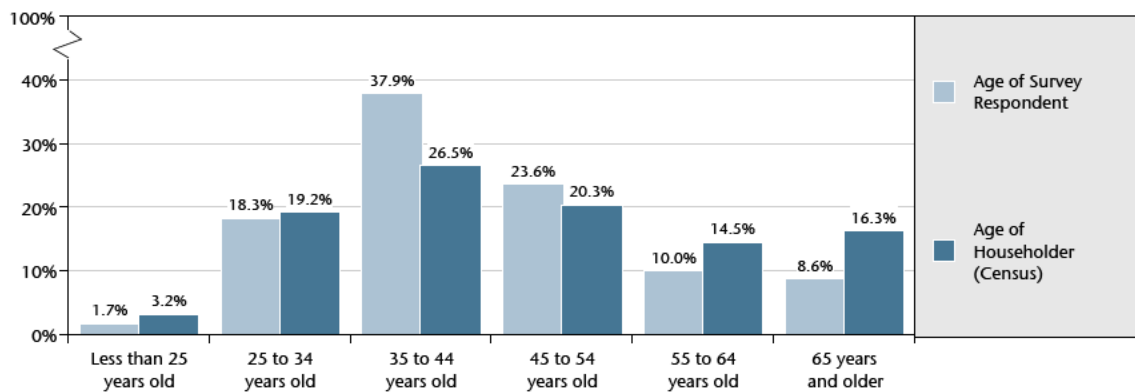


Note: n=231.

Source: Meridian Resident Survey, 2011.

Age. Figure IV-6 compares the age of survey respondents with the age of the city's householders. The survey had high participation from residents between 35 and 44 years of age. Sixteen percent of the city's householders are seniors, compared with 9 percent of survey respondents.

**Exhibit IV-6.
Age of Survey Respondent Compared with Age of Householder, City of Meridian, 2011**



Note: n=301.

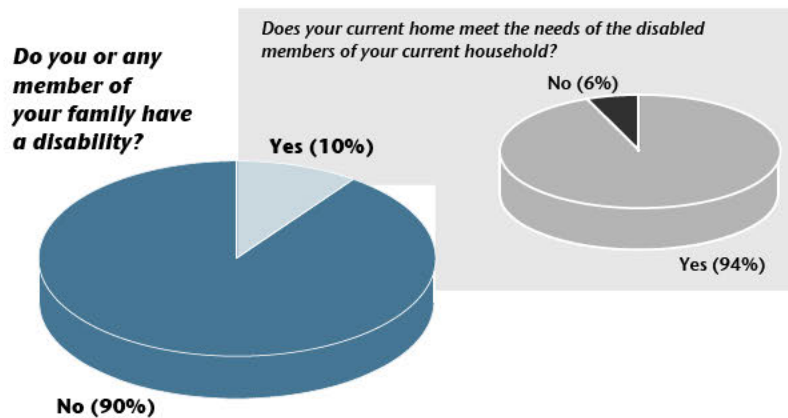
Source: Meridian Resident Survey, 2011 and 2010 U.S. Census.

Disability. Ten percent of survey respondents reported that a member of their household had a mental and/or physical disability. This is a higher rate of disability than that seen citywide (7%).² Most households with a disabled household member live in housing that meets their accessibility needs, as shown in Figure IV-7. Only one survey respondent provided information on their home's accessibility deficiencies. That individual was a senior in need of home modifications to make their home livable for their wheel chair, walker and oxygen machine (e.g., no bathroom on main floor, wider doorways).

Exhibit IV-7.
Disability and Housing Accessibility of Survey Respondents, City of Meridian, 2011

Note:
 n=322 and n=33.

Source:
 Meridian Resident Survey, 2011.

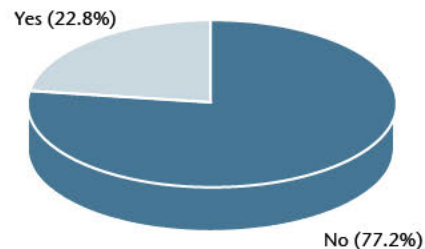


Fair housing knowledge. Survey respondents were also asked whether they knew who to contact if they wanted to report an incidence of discrimination. Seventy-seven percent of survey respondents said they did not know who they would contact.

Figure IV-8.
Response to Question: "If you ever felt discriminated against and wanted to report it, do you know who you would contact?"

Note:
 n=312.

Source:
 Meridian Resident Survey, 2011.



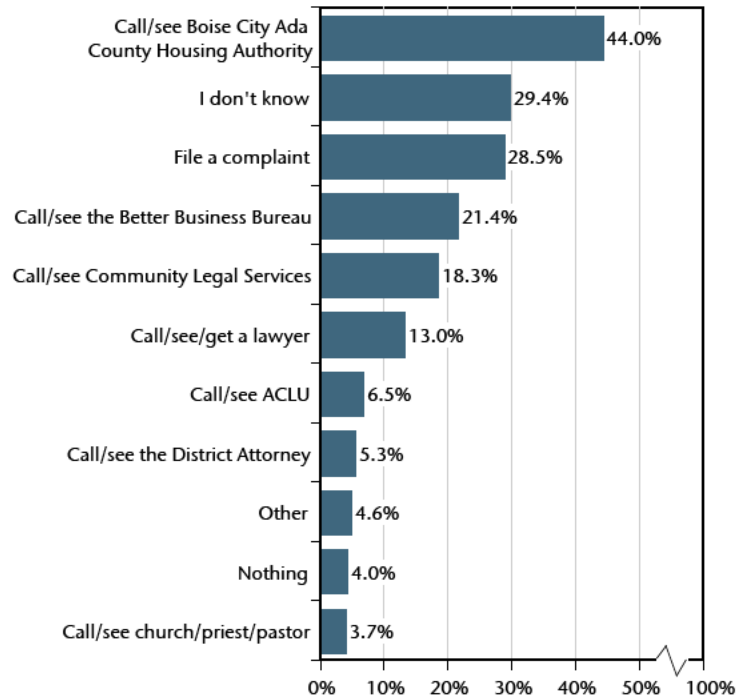
² 2010 1-year American Community Survey.

Survey respondents were asked what they would do if they or someone they knew felt discriminated against when trying to find a place to rent or buy a home. When respondents were provided with a list of potential fair housing resources, 44 percent of all survey respondents said they would contact the Boise City Ada County Housing Authority. Nearly 30 percent of respondents simply didn't know what they would do if they or someone they knew experienced discrimination when looking for a home.

Figure IV-9.
Action/Recommendation
in Response to Housing
Discrimination

Note:
 n=323. Survey respondents were not limited in the number of choices they selected. As such, survey responses do not add to 100 percent.

Source:
 Meridian Resident Survey, 2011.



Three percent of survey respondents responded to the question with “other.” Some of the following responses were provided:

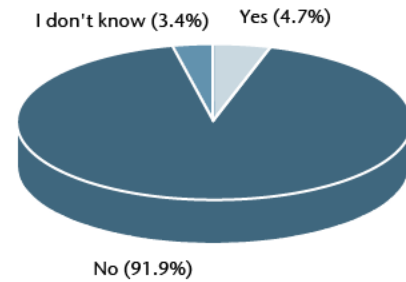
- “It depends on the complaint. I need more information.”
- “HUD.”
- “I think people should be allowed to discriminate. Who am I to say someone else can't choose not to rent me their home for any reason.”
- “Find a different, more tolerant place to live.”
- “Depends on the situation. We have a gay couple in the community that has been targeted since they moved in, which is not OK.”
- “Call TV cable news.”

Experience with housing discrimination. Most survey respondents do not believe they've experienced housing discrimination. Five percent of respondents do think they have experienced discrimination.

Figure IV-10.
Response to Question: "Have you ever experienced housing discrimination?"

Note:
 n=321. Incidence of discrimination may have occurred outside the City of Meridian.

Source:
 Meridian Resident Survey, 2011.

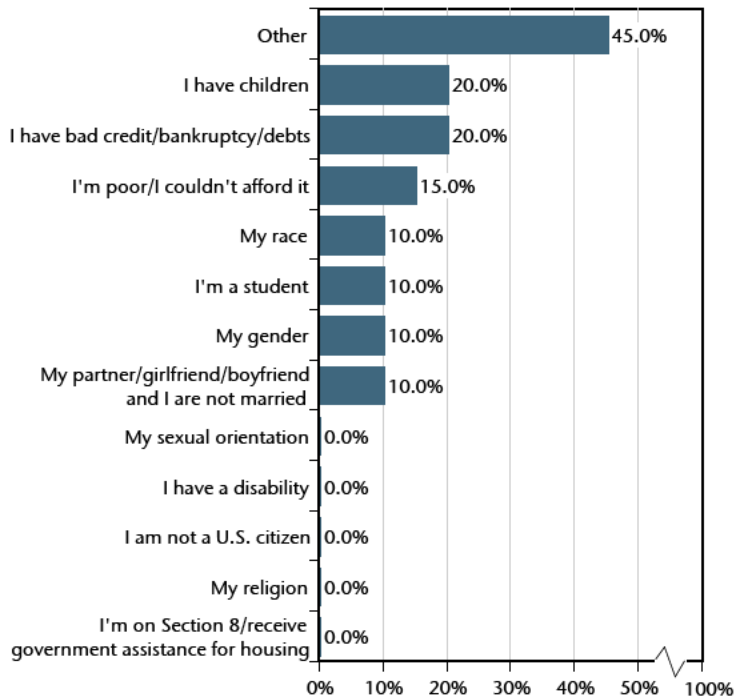


As demonstrated in Figure IV-11, most residents that said they had experienced discrimination or were "not sure" if they had experienced discrimination provided their own reason for the basis of their discrimination, which were mostly related to credit and finances (e.g., self employed, on unemployment, partner's credit history).

Figure IV-11.
Reasons for Discrimination

Note:
 n=20. Incidence of discrimination may have occurred outside the City of Meridian.

Source:
 Meridian Resident Survey, 2011.



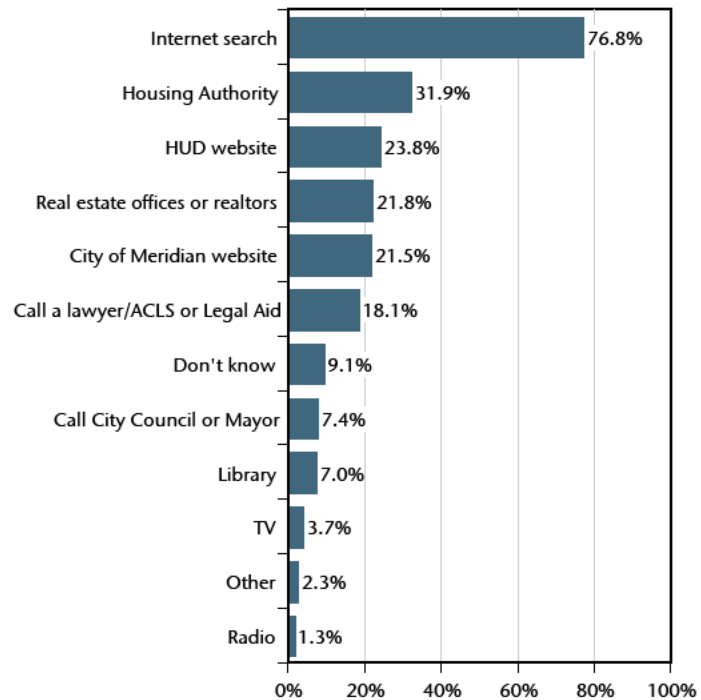
Most survey respondents that felt they had experienced discrimination or were unsure as to whether they'd experienced discrimination (85%) did nothing about the discrimination. In other words, they did not report it, nor did they file a complaint.³

³ n=20.

Fair housing information and resources. Figure IV-12 presents the resources most residents would use for finding information about fair housing rights. Most survey respondents (77%) would rely on a general internet search to find information about fair housing. The Boise City Ada County Housing Authority was also identified by survey respondents as an important fair housing resource in the community.

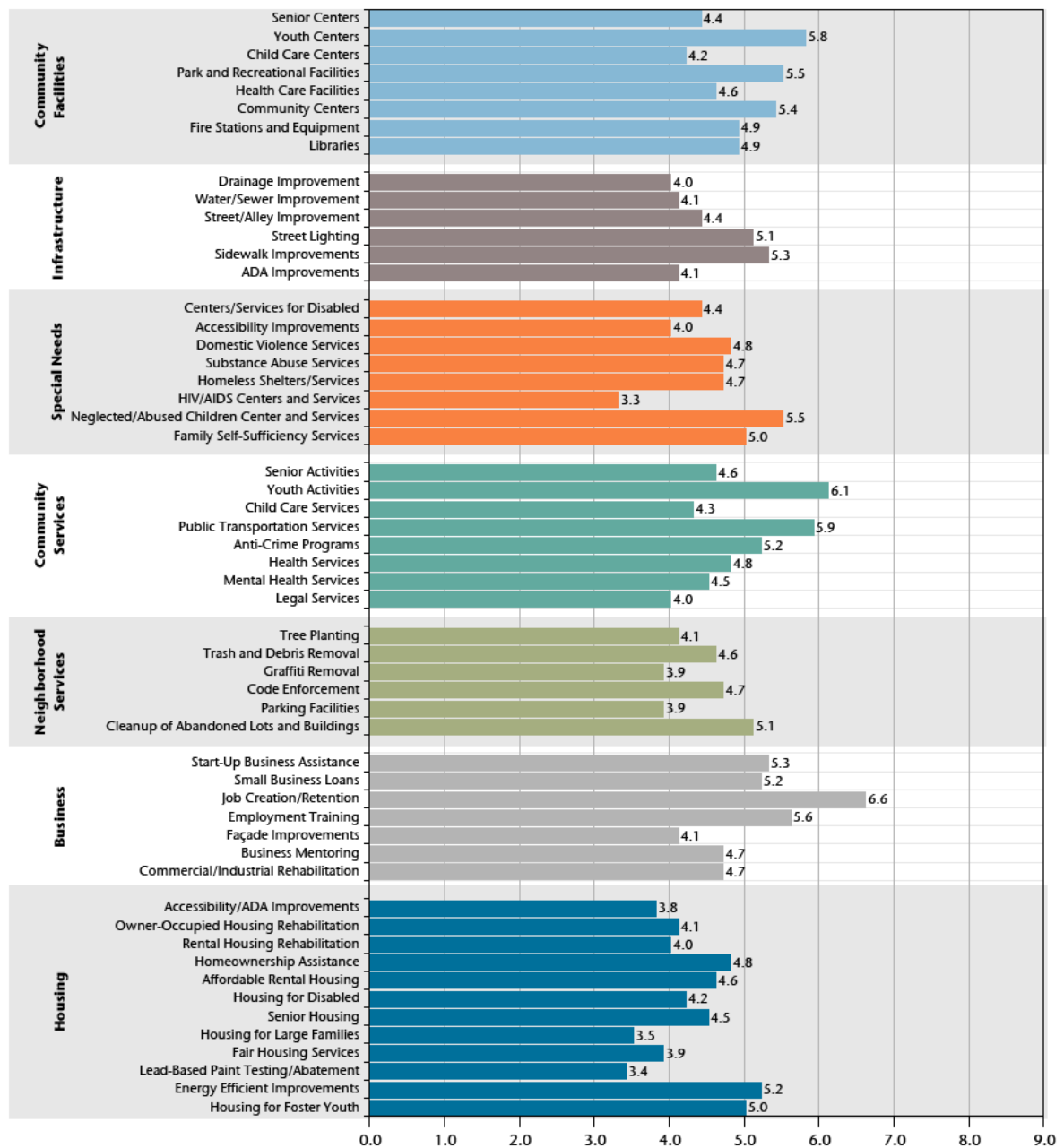
**Figure IV-11.
Reasons for Discrimination**

Source:
Meridian Resident Survey, 2011.



Summary of housing and community development needs. As part of the Consolidated Plan and AI survey, residents were asked to identify the most important needs in the community. Figure IV-12 summarizes the average response ranking for all activities across all seven housing and community development categories. On average, survey respondents considered fair housing services a low to moderate need (3.9 out of 9.0) in Meridian.

Figure III-21.
Summary of Housing and Community Development Needs, City of Meridian, 2011



Source: Meridian Resident Survey, 2011.

Stakeholder Survey and Focus Group

Fifteen stakeholders participated in the online stakeholder survey, and an additional 11 stakeholders participated in a stakeholder focus group or key person interview.⁴ Organizations participating in the public input process represent individuals from a number of protected classes including seniors, immigrants, low income residents, persons with disabilities, persons and families who are homeless, persons with HIV/AIDS, persons with substance abuse/addiction, victims of domestic violence, youth refugees, and veterans.

Stakeholder survey and focus group results are summarized below.

Fair housing discrimination in Meridian. As part of the stakeholder survey, stakeholders were asked to identify the types of discrimination their clients are most likely to experience. Stakeholder responses primarily fall under the following categories:

- Problems obtaining housing because of strict credit requirement, unreasonable deposits, and a lack of rental history;
- Denial of service animal requests;
- Refusal to rent or steering to other properties away from desired property;
- Discrimination targeting non-English speakers. Discrimination includes lack of interpretation of important documents, retention of security deposit; and
- Denial of reasonable accommodation requests or requiring too much information for reasonable accommodation requests.

Stakeholders were asked to identify the most common reason for housing discrimination in Meridian (e.g., race, familial status, disability). Stakeholders believe residents are most likely to be discriminated against because of disability status.⁵ Stakeholders also believe residents may experience discrimination in Meridian because of familial status (presence of children) and national origin.⁶

As demonstrated in their survey responses, stakeholders feel that the most common activity taking place in Meridian is “housing providers placing certain tenants in the least desirable units in a development,”⁷ followed by “housing providers refusing to make reasonable accommodations for tenants with disabilities.”⁸

⁴ Stakeholders were allowed to participate in the online survey and participate in the focus group or key person interviews. As such, there may be some overlap.

⁵ Five stakeholders identified this is a common discriminatory activity.

⁶ Four stakeholders identified this is a common discriminatory activity.

⁷ Five stakeholders identified this is a common discriminatory activity.

⁸ Four stakeholders identified this is a common discriminatory activity.

Fair housing barriers in Meridian. As part of the stakeholder survey, participants were asked to evaluate possible fair housing barriers as “not a barrier,” a “minor barrier,” a “modest barrier,” or a “serious barrier” to fair housing in Meridian. “Restrictive covenants by homeowner associations or neighborhood organizations” received the most designations as a serious barrier to fair housing in Meridian.⁹

To further evaluate fair housing barriers in Meridian, focus group participants were asked to identify what they think are the greatest fair housing barriers in Meridian. Focus group participants identified the following fair housing barriers in Meridian:

- **Economic constraints.** Census tracts that comprise downtown Meridian are HUD-designated LMI areas. Stakeholders feel it would be difficult for low and moderate income residents currently residing in the city’s LMI area to move to other portions of Meridian.
- **Lack of affordable housing.** Stakeholders said a lack of affordable housing is a barrier to fair housing in Meridian. There are few subsidized units in Meridian and the BCACHA has no public housing units in Meridian. Additionally, the city’s limited affordable housing stock is primarily located in central Meridian.
- **Lack of public transportation.** Stakeholders recognize that a lack of public transportation is a barrier to fair housing choice in Meridian. A lack of public transportation may prevent residents from moving into Meridian and it may dictate where some residents reside in Meridian. Stakeholders suggested it was not uncommon for low income residents to move to Boise for greater public transit access.
- **NIMBYism.** Stakeholders suggested that certain types of residential projects, such as multifamily development, have been met by resident opposition in the past. As such, NIMBYism could impact future affordable and multifamily housing projects that could diversify neighborhoods and provide low income residents with opportunities to into traditionally higher income neighborhoods.

Affordable housing development in Meridian.

Three regional affordable housing developers were interviewed to determine why affordable housing has not occurred in Meridian and to identify opportunities for the city to help encourage affordable housing development in Meridian. Their input on the city’s affordable housing market is summarized in this section.

Development barriers. Affordable housing development, particularly for projects relying on Low Income Housing Tax Credits (LIHTC), has slowed down in all portions of the country. As such, there have been few affordable housing projects completed in the Boise region in recent years.

⁹ Five stakeholders responded to this question. Three out of five stakeholders identified this as a serious barrier.

Developers are not optimistic about the return of the LIHTC market because of federal budget cuts and the 5 percent local project investment required by IHFA for LIHTC projects. As such, local affordable housing developers are increasing the affordable housing stock in other ways. One developer has partnered with local private lenders to fund single family acquisition and rehabilitation projects in Meridian.

Developers suggested that Meridian has a limited supply of affordable and available land for affordable housing development. More specifically, one developer said “land is currently not available where affordable development would make the most sense.” Developers suggested that city-owned land in downtown Meridian should be used for affordable housing development.

Affordable housing strategy. Developers suggested that the city first focus on preserving existing affordable units in the city by working with current property owners to ensure that existing affordable housing contracts do not expire. Secondly, the city should adopt a variety of tools to help reduce affordable housing development costs. These tools should be implemented soon to encourage affordable housing development when the market returns. Developers suggested the city should consider adopting the following tools and policies to help encourage affordable housing in Meridian:

- Land donations, particularly in downtown Meridian where some density currently exists;
- Property tax abatements on affordable projects;
- Relax building code and design guidelines for affordable projects (rehabilitation and new construction);
- Expedited review and permitting process for affordable housing projects to alleviate additional carrying costs; and
- Development fee waivers (e.g., building permits, infrastructure costs, utility hook ups).

SECTION IV.
Public Input and Participation

SECTION V.
Fair Housing Impediments and Action Plan

SECTION V.

Fair Housing Impediments and Action Plan

This final section of the Meridian AI identifies impediments found during the research process; and concludes with a recommended Fair Housing Action Plan for the City of Meridian.

Summary of Needs

The following summarizes the major findings from Sections I through IV of this report.

Demographic and racial and ethnic concentrations analysis. The last 10 years in Meridian have been defined by rapid population growth. The city grew from approximately 35,000 residents to 75,000 residents between 2000 and 2010. Meridian currently accounts for 19 percent of Ada County's total population; however, the city accounted 44 percent of Ada County's growth in the last 10 years.

The city's residents are primarily racially White (92%) and ethnically non-Hispanic (93%). Hispanics are the fastest growing minority group in Meridian. In 2000, there were approximately 1,100 Hispanics living in Meridian, compared with more than 5,000 in 2010.

There are no areas of racial or ethnic concentration in the city. The city's original downtown area, which is a HUD LMI area, contains concentrations (based on HUD's definition of disproportionate need) of low income households. This portion of the city also contains a larger proportion of persons with disabilities.

Housing market analysis. Since 2000, the proportion of renter households in Meridian has grown from 16 percent to 23 percent. In other words, more households rent their home now than in 2000.

The median rental rate in Meridian is \$965, which is higher than the median rent in Ada County (\$751) and neighboring Boise (\$718). The rental market has primarily been constructed for households earning between \$25,000 and \$50,000 per year. As such, there is a gap of approximately 1,000 rental units for the 1,700 renter households in Meridian earning less than \$25,000 per year. There are no public housing units and 50 subsidized units in Meridian. An estimated 185 Section 8 vouchers administered by the Boise City Ada County Housing Authority are used in Meridian, and 550 Meridian households are currently on the Section 8 waitlist. The BCACHA recently closed the Section 8 waitlist, indicating that households needing housing assistance in the near future will not be able to apply for the Section 8 program.

Like most communities in the U.S., Meridian has been impacted by foreclosures. According to RealtyTract data, Meridian may have had as many as 55 foreclosure filings just in November 2011. While no portion of Meridian has been immune to foreclosures, the city's downtown area has been particularly impacted. For example, in 2010, more than half of all sales in one downtown Census block group were for bank owned properties.

Public transportation and amenities. Like many western communities, residents in Meridian and the Boise region are primarily dependent on cars for transportation. Nearly 80 percent of Meridian's residents drove alone to work each day. And, less than 1 percent of the city's workers relied on public transportation for their work commute.¹

Public transportation opportunities are limited in Meridian. Although Meridian lies along Valley Ride Transit's regional bus line, the purpose of the regional bus system is largely to connect Boise to Nampa. Residents and stakeholders both noted that public transportation opportunities in Meridian are very limited.

The city has served the defined LMI area in a variety of ways to ensure that municipal services are provided equally throughout the community. The city recently used its CDBG funds for improvements to Centennial Park, located directly south of one of the city's identified LMI Census tracts. The city has used CDBG funds to design improvements to sewer and water lines within the LMI area, and those improvements were recently constructed and paid for with city general funds. The main branch of the Meridian Library is located directly north of an identified LMI census tract, and the Meridian Community Center is located directly south of an identified LMI census tract. The city has used CDBG funds for the design of a segment of the Five Mile Creek Pathway within the LMI Area. CDBG funds will also be used to construct this pathway segment in 2012. This pathway segment will provide an important recreational opportunity as well as an alternative transportation corridor.

In addition to the location of these municipal services, the city has coordinated a Community Clean-Up Day for the past 7 years. This Clean-Up Day has taken place within the downtown core of the city, at the heart of the identified LMI Area. The city's contracted waste collection company, SSC, is one of the primary partners for this important community event, and all the metal recycling money collected during the day is given to a local charity.

Complaint, legal and lending analysis. In the last six years, 18 fair housing complaints were filed for activities taking place in Meridian. Most complaints were filed on the basis of disability status (61%), followed by race (17%), familial status (11%) and national origin (6%). Eleven of the 18 cases are closed. Most (64%) cases closed following a successful conciliation or settlement; these cases involved discrimination based on disability or familial status.

No recent fair housing legal cases have occurred in Meridian. An analysis of statewide complaints completed by BBC in summer 2011 found that the vast majority of fair housing legal cases in the State of Idaho occurred in Ada County and were related to developers, builders, engineers and/or architects failing to comply with the accessibility requirements of the federal Fair Housing Act and the Americans with Disabilities Act (ADA).

There is no evidence of lending discrimination occurring in Meridian. In 2010, Hispanics accounted for 7 percent of the city's population and 3 percent of the city's loan applicants. Denial rates among Hispanic loan applicants (15%) were slightly higher than White applicants (13%); however, the difference is not enough to suggest lending discrimination. Denial rates among Black/African American loan applicants were 31 percent, which is much higher than White applicants. While Black/African American loan applicants experienced much higher denial rates (38%) than White

¹ Means of transportation to work statistics from the 2010 American Community Survey 1-year estimate.

applicants; however, too few applications were submitted by African Americans to truly analyze lending disparities. There were two Census tracts in Meridian that had higher loan denial rates than the city overall; these areas did not correlate to the city's low income areas. Furthermore, there was no racial or ethnic disparity in subprime lending in 2010, indicating that subprime loans were not targeted to the city's racial or ethnic minorities.

Public input. The public input process for the city's Consolidated Plan and AI included a resident survey (330 responses), a stakeholder survey (15 responses), a stakeholder focus group (seven participants) and key person interviews (six interviews).² The city's outreach effort involved numerous organizations representing individuals from a number of protected classes including seniors, immigrants, low income residents, persons with disabilities, persons and families who are homeless, persons with HIV/AIDS, persons with substance abuse/addiction, victims of domestic violence, youth refugees, and veterans.

Five percent of survey respondents definitively reported that they had experienced housing discrimination in Meridian. Many stakeholders feel that discrimination happens more frequently in Meridian, particularly for persons with disabilities, families with children/pregnant women and persons of a different national origin.

Stakeholders identified a number of ways discrimination may be occurring in Meridian. These include:

- Problems obtaining housing because of strict credit requirement, unreasonable deposits, and a lack of rental history;
- Denial of service animal requests;
- Refusal to rent or steering to other properties away from desired property;
- Discrimination targeting non-English speakers. Discrimination includes lack of interpretation of important documents, retention of security deposit; and
- Denial of reasonable accommodation requests or requiring too much information for reasonable accommodation requests.

Stakeholders identified a number of potential fair housing barriers in Meridian. Survey participants noted that "restrictive covenants by homeowner associations or neighborhood organizations" is potentially a serious barrier to fair housing in Meridian. Focus group participants also believe economic constraints, lack of affordable housing, lack of public transportation and NIMBYism may also be barriers to fair housing in Meridian.

Fair Housing in Meridian

In 2007, one of the housing impediments identified in the city's AI was related to the need for potential renters, buyers, and the general public to understand the requirements of the Fair Housing Act. In response to this impediment, the city added information to its website about the city's Fair Housing Strategy and other housing related resources for members of the community to access.

² Some stakeholders participated in more than one outreach effort.

In addition, the City was a sponsor of the City of Boise's fair housing public awareness campaign in April 2011. The campaign was called *Good Neighbors + Fair Housing = Strong Communities* and was intended to increase community awareness and understanding of fair housing rights and responsibilities. Fair housing messages were spread to Treasure Valley residents through radio and television public service announcements, billboards, bus panels, bus benches and community presentations. The initiative was supported through the financial contributions of 15 partners, including Idaho Housing and Finance Association (IHFA), the Idaho Department of Health and Welfare, local banks, Valley Regional Transit and local broadcasting companies.

Fair Housing Impediments and Action Plan

The City of Meridian has evolved from a small, isolated farm community to an integral part of the Boise region. The city's convenient proximity to the region's major service centers, Boise and Nampa, has undoubtedly contributed to the city's rapid growth in the last 10 to 20 years. However, the city is more than a bedroom community to its neighbors. The city is now the home of a major regional medical facility (St. Luke's), and Meridian is well-positioned to attract additional business growth in the future.

As the city's role in the region has evolved, so has its population. The city's residents are aging, and its Hispanic population has grown in the last 10 years. The city's changing population makes fair housing awareness even more important. As such, the Fair Housing Action Plan (FHAP) is intended to help the city welcome new residents and retain existing residents as it continues to grow and evolve in the region.

In the following section, barriers that are, according to HUD, "relevant to federal fair housing issues" are termed "impediments." The one barrier that is not directly related to the elimination of housing discrimination is the first barrier, which is related to lack of affordable housing

BARRIER NO. 1. (related to fair housing) Lack of affordable housing. The city has a limited inventory of affordable units for its size. Affordable housing development has recently been limited to acquisition and rehabilitation of single family units in the downtown area. As such, low and moderate income residents may have a hard time finding an affordable unit, particularly outside the downtown area. Stakeholders participating in the public outreach efforts all suggested that a lack of affordable housing was a barrier to fair housing in Meridian.

Why is this a barrier? Lack of affordable housing can lead to income, racial and ethnic segregation and may disproportionately restrict housing choices for certain protected classes. This may occur because racial and ethnic minorities have lower incomes or because persons with disabilities require specific housing accommodations and need affordable housing due to limitations on employment.

Action item 1.1. –Preserve existing affordable housing units in the city. The city has a limited affordable housing stock. The city should aggressively attempt to preserve existing affordable units in the city by working with current property owners to ensure that existing affordable housing contracts do not expire. This would include identifying affordable housing owners in the city and understanding their needs for retaining the affordability component of their property.

Action item 1.2. – Convene an affordable housing task force to investigate ways to develop new affordable housing. The city should convene an affordable housing task force to identify ways to encourage affordable housing development in Meridian. The task force should include community development staff, developers, representatives of the finance and banking industry and representatives from the city’s economic development organizations. The task force could also include existing affordable housing property owners.

The primary task of the committee would be to identify tools used by other neighboring and regional communities to encourage affordable housing development, and determine what may work in Meridian. Some of these tools, which were identified by local affordable housing developers during the public input process, include the following:

- Property tax abatements on affordable projects (this task will require input from Ada County);
- Relaxed design guidelines for affordable projects (rehabilitation and new construction);
- Expedited review and permitting process for affordable housing projects to alleviate additional carrying costs; and
- Development fee waivers (e.g., building permits, infrastructure costs, utility hook ups).

The Idaho Housing and Finance Association (IHFA) is responsible for administering the Low Income Housing Tax (LIHTC) program in Idaho. Local communities are required to contribute 5 percent of the cost of the project to be eligible for LIHTCs projects in their community. As such, Meridian should identify ways to generate funds for this local match if a potential affordable project is proposed in their community. The city should investigate the fiscal tools other Idaho communities have implemented to generate this local contribution.

BARRIER NO. 2 (impediment). Potential resident opposition to affordable housing development. Stakeholders suggested that certain types of projects in Meridian have historically been met with resident opposition. Opposition against certain types of development is often referred to as “Not in My Backyard Syndrome” (NIMBY). Strong resident opposition to affordable projects may result in future projects being declined.

Why is this a barrier? In reviewing AIs, HUD gives consideration to how communities hold themselves out to residents. Do they appear to be welcoming? Warm? Or exclusive? It is thus important in this era of fair housing that communities and residents project a positive image of housing choice and diversity.

Action item 2.1. – Continue to participate in the regional fair housing awareness campaign and tailor it to current needs. In 2011, the city participated in the *Good Neighbors + Fair Housing = Strong Communities* campaign to raise awareness of fair housing in Meridian. The city should continue this campaign to ensure residents are aware of their responsibilities, as well as the city’s responsibilities, in affirmatively furthering fair housing in Meridian.

The campaign should be modified to include issues raised as part of this AI. For example, the campaign should discuss the importance of having a variety of housing types in all neighborhoods to ensure all residents are welcome throughout Meridian. The campaign should also include some outreach to local HOAs to ensure their covenants, conditions and restrictions (CCRs) do not violate

the Fair Housing Act. The city should provide HOAs with the contact information for community development and legal staff to review CCRs if necessary.

BARRIER NO. 3 (impediment). Limited public transportation opportunities. The city has limited public transportation opportunities. This has the effect of disconnecting Meridian from the rest of the region, particularly for residents reliant on public transportation. This has a disproportionate impact on persons with disabilities who often rely on public transportation, as well as low income residents.

Why is this a barrier? Lack of transit opportunities creates a barrier to fair housing choice because it may have the effect of preventing certain types of residents—specifically persons with disabilities, seniors and low-income individuals—from living in a community or in certain parts of a community.

Action Item 3.1. Continue to stay engaged in regional transportation planning efforts, leverage local resources for local transit opportunities and seek partnerships. Regional transit is costly, and solutions to solving regional transit issues will not occur overnight. The city must develop a long term strategy to solving public transportation issues in the community.

The city’s Transportation Task Force should stay intact and should continue working on the city’s initial transit plan. This plan is still in its early stages, but is envisioned to eventually provide reliable, fixed-route service throughout the community. Partnerships will be key to getting a public transit system off the ground. Besides VRT, COMPASS, Joint School District #2 and the City Council will all need to play a role.

The city should stay engaged in regional planning efforts and identify opportunities for modifying existing bus routes or adding stops to existing routes. The city should also work with the Idaho Transportation Department to identify grant opportunities for improving public transportation infrastructure if additional bus stops become available (e.g., bus shelters, curb cuts).

The city should also identify local partners reliant on public transportation to leverage resources and generate local transportation partnerships. This could include using the senior center transportation service for persons with disabilities or identifying opportunities to partner with the local school district for out of district trips.

BARRIER NO. 4 (impediment). Lack of understanding by developers and landlords about housing accessibility requirements. A “lack of understanding by developers and landlords about housing accessibility requirements under the ADA” was identified as an impediment in the city’s last AI, and continues to be an impediment in the city. Nearly all legal cases that have occurred in the Boise region in recent years have occurred against developers, builders, engineers and/or architects failing to comply with the accessibility requirements of the federal Fair Housing Act and the Americans with Disabilities Act (ADA). Additionally, 61 percent of all fair housing complaints filed in Meridian in the last six years have been on the basis of disability status, primarily for failure to make reasonable accommodations for a disability.³

Why is this a barrier? Persons with disabilities are a protected class under the Fair Housing Act.

³ Twenty-five percent of all complaints filed in Meridian between 2006 and 2011 cited “failure to make a reasonable accommodation.”

Action Item 4.1. Tailor fair housing outreach campaign to address the needs of persons with disabilities. BBC recommends that the city continue its fair housing outreach campaign (Action Item 2.1). As part of that campaign, the city should tailor its message to highlight the needs and rights of the city's disabled population.

Action Item 4.2. Expand outreach and education to Meridian's landlords. As part of the city's fair housing outreach campaign, city staff should visit multifamily properties in the city to ensure landlords are aware of fair housing law and requirements for serving persons with disabilities. City staff could also coordinate with a local FHIP to conduct outreach and training to Meridian landlords.

Action Item 4.3. Train community development staff on ADA and fair housing design and construction guidelines. The city should ensure that all staff members involved in the building plan review process are aware of the design and construction requirements of the ADA and the Fair Housing Act to ensure all new units are in compliance with the legislation.

PY2012-2016 fair housing goals. The matrix on the following page summarizes the city's FHAP to minimize impediments.

**Figure V-1.
Fair Housing Action Plan Matrix, City of Meridian, PY2012-2016**

FHAP Action Item	Activities	Lead Agency/ Responsible Entity	Funding Source/Amount	Program Year 2012 Goals
BARRIER 1 (Fair Housing Related Activity/Affordable Housing)—Lack of affordable housing.				
1.1 Preserve existing affordable housing units in the city.	<ul style="list-style-type: none"> Identify existing owners of affordable housing units in Meridian. 	City of Meridian, CDBG Administrator	City of Meridian, CDBG Administration	– Create a contact list of owners of affordable housing units in Meridian.
	<ul style="list-style-type: none"> Meet with affordable housing owners and help encourage them to not let contract on affordable units expire. 	City of Meridian, CDBG Administrator	City of Meridian, CDBG Administration	– Conduct at least one meeting with owners of affordable housing units in Meridian.
BARRIER 2 (Impediment)—Potential resident opposition to affordable housing development.				
2.1 Continue to participate in regional fair housing awareness campaign and tailor it current needs.	<ul style="list-style-type: none"> Monetarily sponsor the regional fair housing awareness campaign. 	City of Meridian, CDBG Administrator	City of Meridian, CDBG Administration/\$500	
	<ul style="list-style-type: none"> Design and distribute flyers and display posters in Meridian specific to the current fair housing needs in Meridian. 	City of Meridian, CDBG Administrator	City of Meridian, CDBG Administration/\$500	– Provide flyers and posters to at least 5 landlords and 5 homeowner’s associations in Meridian.
BARRIER 3 (Impediment)—Limited public transportation opportunities.				
3.1 Continue to stay engaged in regional transportation planning efforts, leverage local resources for local transit opportunities and seek partnerships.	<ul style="list-style-type: none"> Research state and federal transportation grants and determine if they could help support public transit planning efforts in Meridian. 	City of Meridian Staff and Meridian Transportation Task Force	City of Meridian Staff Time	– Create a list of potential transportation grants the City may be interested in applying for.
	<ul style="list-style-type: none"> Meet monthly with the Meridian Transportation Task Force, the ACHD Capital Improvement Citizen Advisory Committee (ACHD CICAC), the COMPASS Regional Technical Advisory Committee (COMPASS RTAC), and Meridian's Traffic Safety Task Force. 	City of Meridian Planning Staff	City of Meridian Staff Time	– Provide an update on any work the Meridian Transportation Task Force or other committee’s may be doing related to public transportation in Meridian.

Source: City of Meridian and BBC Research & Consulting.

**Figure V-1. (Continued)
Fair Housing Action Plan Matrix, City of Meridian, PY2012-2016**

FHAP Action Item	Activities	Lead Agency/ Responsible Entity	Funding Source/Amount	Program Year 2012 Goals
BARRIER 4 (Impediment)—Lack of understanding by developers and landlords about housing accessibility requirements.				
4.1 Tailor fair housing outreach campaign to address the needs of persons with disabilities.	<ul style="list-style-type: none"> As part of regional fair housing awareness campaign, address needs of persons with disabilities, such as including information about reasonable accommodations and service animals in campaign message. 	City of Meridian, CDBG Administrator	City of Meridian, CDBG Administration	<ul style="list-style-type: none"> Provide flyers and list of information sources to at least 5 landlords in Meridian.
4.2 Expand outreach and education to Meridian’s landlords.	<ul style="list-style-type: none"> Conduct a fair housing training in Meridian specific to landlords. 	City of Meridian, CDBG Administrator	City of Meridian, CDBG Administration/\$1,000	<ul style="list-style-type: none"> Conduct a fair housing training for at least 10 Meridian landlords.
4.3 Train City Community Development staff on ADA and fair housing design and construction guidelines.	<ul style="list-style-type: none"> Conduct an internal training for Community Development staff on fair housing design and construction guidelines. 	City of Meridian, CDBG Administrator	City of Meridian, CDBG Administration/\$500	<ul style="list-style-type: none"> Conduct an internal training for at least 5 City Community Development staff.

Source: City of Meridian and BBC Research & Consulting.

Structure for Oversight Responsibilities, Monitoring & Evaluation

The completion of this AI was overseen by the City of Meridian's Department of Community Development. Community Development will be ultimately responsible for carrying out the Fair Housing Action Plan. To ensure that each activity is carried out, Community Development will conduct an evaluation of each activity during each program year and identify additional areas that require study or analysis and how to address the additional areas. As part of the annual Consolidated Annual Performance and Evaluation Report (CAPER), Community Development will include a summary of the following:

- Actions taken to affirmatively further fair housing;
- A summary of impediments to fair housing choice in the AI; and
- Identify actions taken to overcome effects of impediments identified in the AI.

Per Section 2.14 in HUD's Fair Housing Planning Guide, Community Development will maintain the following data and information as documentation of the city's Fair Housing Action Plan:

- A copy of the AI and any updates.
- A list of actions taken each year as part of the Fair Housing Action Plan to eliminate the impediments identified in the AI.

At the end of each program year, the city will submit information to HUD about the actions taken to fulfill the Fair Housing Action Plan and an analysis of their impact.