

FAIR & AFFORDABLE HOUSING COMMISSION



Casey Holcomb
Commission Chair

FAHC@ci.moscow.id.us

Regular Meeting
~Agenda~

Aimee Hennrich
Staff Liaison
208.883.7095

<http://www.ci.moscow.id.us/358/Fair-Affordable-Housing-Commission>

Thursday
February 6, 2025

5:30 PM

Haddock Building
504 S Washington Street

WELCOME AND ATTENDANCE

REGULAR AGENDA

1. Approval of Minutes from January 2, 2025 (ACTION ITEM)

Presentation of minutes for approval.

PROPOSED ACTIONS: Approve minutes as presented; approve minutes with amendments; or provide staff with further direction if necessary.

2. Update on Scheduling Yearly Events

The Commission will discuss upcoming 2025 events.

3. Budget Request for FY2026 (ACTION ITEM)

The City is currently preparing the 2026 fiscal year budget, and the Commission will need to submit their request by the end of February.

PROPOSED ACTIONS: Discuss and provide staff with feedback and further direction if necessary.

4. Pamphlet and Literature Review for Outreach Opportunities

There will be a review of the Commission pamphlets and literature.

5. Review Analysis of Impediments and Addendum (ACTION ITEM)

The Commission created an Analysis of Impediments in 2015 and then included an Addendum in 2019.

PROPOSED ACTIONS: Discuss and provide staff with feedback and further direction if necessary.

REPORTS

ANNOUNCEMENTS

UPCOMING EVENTS / MEETINGS

ADJOURN

NOTICE: It is the policy of the City of Moscow that all City-sponsored public meetings and events are accessible to all people. If you need assistance in participating in this meeting or event due to a disability under the ADA, please contact the City's ADA Coordinator by phone at (208) 883-7600, TDD (208) 883-7019, or by email at adacoordinator@ci.moscow.id.us at least 48 hours prior to the scheduled meeting or event to request an accommodation. The City of Moscow is committed to ensuring that all reasonable accommodation requests are fulfilled.

FAIR & AFFORDABLE HOUSING COMMISSION



Casey Holcomb
Commission Chair

FAHC@ci.moscow.id.us

Regular Meeting

~Minutes~

Aimee Hennrich
Staff Liaison

208.883.7095

<https://www.ci.moscow.id.us/358/Fair-Affordable-Housing-Commission>

**Thursday
January 2, 2025**

5:30 PM

**Haddock Building
504 S Washington Street**

Holcomb called the meeting to order at 5:37 PM

MEMBERS PRESENT: Casey Holcomb, Chair; Juan Albaitero, Randy Baukol, Jo Ellen Force, Sage McCetich, Jennifer Wallace
MEMBERS ABSENT: Ellen Peterson, Eija Sumner
STAFF: Aimee Hennrich

REGULAR AGENDA

1. Election of Officers for 2025 (ACTION ITEM)

The Commission will need to nominate officers for 2025.

This item was discussed as Agenda Item No. 2.

Wallace moved to elect Holcomb as Chair, Baukol as Vice Chair, and McCetich as Secretary for 2025, seconded by Force. Roll Call Vote: Ayes: Baukol, Force, Holcomb, McCetich, Wallace (5). Nays: None. Abstentions: Albaitero (1). Motion carried.

2. Approval of September 5, 2024 Minutes (ACTION ITEM)

Presentation of minutes for approval.

This item was discussed as Agenda Item No. 1.

McCetich moved for approval of the minutes as written, seconded by Wallace. Roll Call Vote: Ayes: Baukol, Force, Holcomb, McCetich, Wallace (5). Nays: None. Abstentions: Albaitero (1). Motion carried.

3. Upcoming Year Planning

The Commission discussed some changes with the Intermountain Fair Housing Council (IFHC) representative and planned to add time on future agendas for reporting. It was suggested that a review of the 2019 Analysis of Impediments and Fair Housing Plan would be good to do this year. The status of the new Latah County Housing Authority is uncertain. The upcoming Latah County Health and Wellness Fair will be in March.

IFHC's annual training will be sometime in April, but the Commission needs to schedule it. A Commissioner suggested coordination between Latah County and FAHC regarding homeowner exemption removal to notify property owners of fair housing requirements. The Commission continued to discuss the 2025 budget and public involvement.

Albaitero arrived at 6:30 PM

REPORTS

ANNOUNCEMENTS

The Intermountain Fair Housing Board meeting is scheduled for January 22, 2025.

UPCOMING EVENTS / MEETINGS

The next regular meeting of the Fair & Affordable Housing Commission is scheduled for February 6, 2025.

The meeting was adjourned at 6:39 PM

Casey Holcomb, Chair

DRAFT

RESOLUTION NO. 2015 – 23

A RESOLUTION OF THE CITY OF MOSCOW, A MUNICIPAL CORPORATION OF THE STATE OF IDAHO, PROVIDING FOR THE ADOPTION OF THE CITY OF MOSCOW ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING AND FAIR HOUSING ACTION PLAN AS PREPARED AND PRESENTED BY THE CITY OF MOSCOW FAIR AND AFFORDABLE HOUSING COMMISSION; PROVIDING FOR THE CERTIFICATION THAT THE CITY OF MOSCOW AFFIRMATIVELY PROMOTES FAIR HOUSING WITHIN THE COMMUNITY; PROVIDING THIS RESOLUTION BE EFFECTIVE UPON ITS PASSAGE AND APPROVAL.

WHEREAS, it is a fundamental belief of the Council and the citizens of Moscow, Idaho that the City has the obligation to actively and affirmatively promote fair housing and to ensure that no person shall be subjected to discrimination on the basis of race, color, religion, age, sex, disability, familial status, national origin, veteran's status, sexual orientation and/or gender expression/identity in the sale, rental, or advertising of dwellings, in the provision of brokerage services, or in the availability of residential real estate related transactions within the community; and

WHEREAS, discrimination in housing is contrary to a free and open society; and

WHEREAS, the City prides itself in and encourages and supports the diversity of its inhabitants and the availability of safe and affordable housing for all persons; and

WHEREAS, City Council believes that encouraging fair and affordable housing is consistent with the strong values that are part of the fabric of our Idaho communities in general, and of Moscow in particular; and

WHEREAS, the Fair Housing Act is Federal law and prohibits discrimination in the sale, rental and financing of dwellings based on race, color, religion, sex or national origin; and

WHEREAS, the Council passed Ordinance No. 2000-21 on September 18, 2000, providing for the establishment of the Moscow Fair and Affordable Housing Commission to advise the City of ways to eliminate unfair housing practices; and

WHEREAS, the Council adopted the first Analysis of Impediments to Fair Housing and Fair Housing Action Plan on March 17, 2003; and

WHEREAS, the Fair and Affordable Housing Commission determined that it was necessary to review and update the Analysis of Impediments to Fair Housing and Fair Housing Action Plan; and

WHEREAS, the Fair and Affordable Housing Commission made the Analysis of Impediments to Fair Housing and Fair Housing Action Plan available to the public on November 5, 2015, at which time a public meeting was held to invite and receive comment regarding the document; and

WHEREAS, the Fair and Affordable Housing Commission provided an opportunity for public review and comment from November 5, 2015, through December 4, 2015; and

WHEREAS, the Commission, having examined all City codes, policies and procedures; having conducted surveys of the Community's housing occupants; and having collected other public comment, has updated the City of Moscow Analysis of Impediments to Fair Housing and Fair Housing Action Plan; and

WHEREAS, the Fair and Affordable Housing Commission has presented the Analysis of Impediments to Fair Housing and Fair Housing Action Plan to Council at a public meeting held on December 21, 2015; and

WHEREAS, Council has received the Fair and Affordable Housing Commissions presentation and has reviewed the document.

NOW, THEREFORE, be it resolved by the Mayor and City Council of the City of Moscow, Idaho, that the attached City of Moscow Analysis of Impediments to Fair Housing & Fair Housing Action Plan is hereby adopted as guidance for City of Moscow in the promotion of fair housing within the community.

Passed by the City Council and approved by the Mayor this 21st day of December, 2015.



Bill Lambert, Mayor

ATTEST:


Laurie M. Hopkins, City Clerk



*Fair & Affordable
Housing Commission*

City of Moscow Analysis of Impediments to Fair Housing & Fair Housing Action Plan



Adopted December 21, 2015

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Graphic Credit: Max Cowan, Associated Students of the University of Idaho



1.0 Introduction

The Federal Fair Housing Act, 42 U.S.C. §3601 et seq., prohibits discrimination in the sale or rental of housing on the basis of race, color, religion, sex, national origin, handicap, and familial status (presence of children under age eighteen). Furthermore, the Idaho Human Rights Act, I.C. 67-5901 et seq., also prohibits discrimination on the basis of race, color, religion, sex, national origin, and disability in all real estate transactions in the State of Idaho. The City of Moscow passed Ordinance No. 2013-06 in April 2013 which provides that the City prohibits housing discrimination on the basis of sexual orientation or gender expression/identity. For Moscow, this prohibition is in addition to state and federal laws.

The State of Idaho has adopted the Idaho Fair Housing Plan (Analysis of Impediments to Fair Housing Choice), which was revised in May 2012. The Idaho Fair Housing Plan was prepared by the Idaho Department of Commerce in cooperation with the Idaho Housing and Finance Association on behalf of the State of Idaho. The impetus for the Idaho Fair Housing Plan came from the United States Department of Housing and Urban Development (hereinafter “HUD”). Since 1983, the Community Development Block Grant (hereinafter “CDBG”) program has required recipients of CDBG funding to certify that they will affirmatively promote fair housing. Since 1995, HUD has required grantees to certify that they will affirmatively promote fair housing by preparing an analysis of impediments to fair housing choice within their jurisdiction, implement actions to overcome the effects of any impediments identified by the analysis and maintain records of all relevant activities and actions taken.

Similarly, the City of Moscow Analysis of Impediments to Fair Housing and Fair Housing Action Plan (hereinafter “Plan” or “the Plan”) is the City’s endeavor to fulfill the CDBG requirements instituted by HUD and to promote compliance with the federal Fair Housing Act. HUD requires entitlement cities of the CDBG program to regularly update their Plan. The City of Moscow is not an entitlement city since the population is less than 50,000, however this analysis and action plan assists Moscow in being a good candidate for state-administered CDBG funds. Completing this analysis and development of an action plan publishes Moscow’s efforts to promote fair housing and provides direction to the efforts of the Moscow Fair and Affordable Housing Commission (hereinafter “the Commission”). The first City of Moscow Plan was prepared by the Commission and was adopted by the City Council in 2003, with an addendum in 2005. The duties of the Commission, as established by the Moscow City Council are to further fair and affordable housing practices and education of the public, housing providers, and other individuals involved in the housing industry with respect to fair housing and the requirements of the relevant laws and regulations.

2.0 Executive Summary

The current City of Moscow Analysis of Impediments to Fair Housing and Fair Housing Action Plan was adopted in 2003; this document replaces the 2003 Plan. By completion and adoption of this plan, the City of Moscow is certifying that it will affirmatively promote fair housing within its jurisdiction, implement actions to overcome the effects of any impediments identified by the analysis of impediments, and maintain records of all relevant activities and actions taken.

The work completed in developing this Plan included an analysis of the private and public sector, involving the collection of data and review of City Codes, policies and plans to identify impediments to fair housing choice for Moscow's residents. The Moscow Fair and Affordable Housing Commission contracted with the Department of Geography of the University of Idaho in order to conduct a mailed survey to further explore impediments to fair housing that may exist in the private sector. The survey results showed very little diversity among the respondents in regard to race, nationality and sexual orientation. However, three conclusions are drawn from the survey results: 1) there is a perception of housing discrimination in the community among individuals who indicated they have never personally felt discriminated against; 2) there is a clear perception of income discrimination in Moscow (although income discrimination is not prohibited by the Fair Housing Act); and 3) the annual renter income to rental expense ratio for renters who responded to the survey reaches "housing-cost burden" levels. These conclusions can be drawn from the data, however it is important to note that the response rate for the survey is not considered to be a statistically valid sampling for the community. The survey process, summary and further discussion of results is found in Section 5.0.

An analysis of impediments to fair housing within the City of Moscow Municipal Code, the Comprehensive Plan, the International Building Code, City Employment Manuals, and hearing policies is found in Section 6.0 of this Plan. Rather than provide for a separate fair housing action plan, fair housing action items are included within the analysis section of this plan beginning on page 16.

Each action item is set out individually in a text box detailing the particular impediment identified and the proposed action to resolve the impediment. Identified action items are as follows:

1. **City Comprehensive Plan:** Research and development of programs and partnership opportunities for maintaining affordable housing.
2. **City Zoning Code:** Amend nonconforming code section.
3. **City Zoning Code:** Amend definition of day care facility to no longer include foster homes.
4. **Tax Policy:** Create educational materials to increase awareness of tax credit programs.
5. **Survey:** Survey private sector to identify training needs for community.
6. **Training:** Promote and co-sponsor fair housing educational opportunities.

The action items described in Section 6.0 of this Plan either address existing impediments to fair housing or encourage the provision and maintenance of affordable housing. It is the goal of the Fair and Affordable Housing Commission to address each action item within three years from the adoption date of this Plan and provide an addendum to the Plan documenting steps taken and actions completed.

Section 7.0 of the Plan provides details concerning the state of fair housing enforcement in Idaho, and examines the enforcement entities that provide these services. Information regarding fair housing complaints that have been filed with the various enforcement entities is included. Finally, Section 8.0 presents information regarding the state of affordable housing in Moscow and its relationship to fair housing.

According to the 2014 Statewide Housing Needs Survey conducted by BBC Research & Consulting, the top barriers that limit fair housing opportunities for Idaho residents (as indicated by stakeholders surveyed) are lack of affordable housing near employment, low wages, lack of jobs, land costs, and Not-in-My-Backyard syndrome (NIMBYism). Stakeholder suggestions for improving the fair housing environment included education (seminars/trainings) and increased awareness/outreach. Along with the action items identified within this Plan, the Commission acknowledges that one of the best ways to improve the fair housing environment, reduce impediments and fair housing complaints, and affirmatively promote fair housing within Moscow is to continually educate and raise awareness of fair and affordable housing practices.

3.0 Background and Plan Preparation

In 1998, the Mayor and City Council of the City of Moscow enacted an ordinance amending Title 3, Chapter 6 of the Moscow City Code to create the Moscow Fair Housing Commission. The Commission was empowered to “review, on at least an annual basis, the City Code Analysis and [sic] Impediments to Fair Housing and Action Plan and shall make recommendations to the Mayor, the City Council and the City’s Fair Housing Resource Representatives for amendments or changes to such Plan as it deems necessary.” Moscow City Code, Title 3, Chapter 6, §6-2(E).

In 1999, another ordinance was enacted to amend Moscow City Code Title 10, Chapter 14. The new ordinance, designated the Moscow Fair and Affordable Housing Ordinance, created the position of Fair Housing Program Resource Representative to assist the Moscow Fair Housing Commission in the execution of its duties.

The Commission began updating the 2003 Analysis of Impediments document in early 2013. In preparation of the updated Plan, the Commission worked on data collection and co-sponsored a number of events to provide various training and educational opportunities to the public and to hear from community members any concerns regarding the provision of fair housing within the City. The Commission contracted with the University of Idaho Geography Department to conduct a mailed survey in March 2014. The survey was randomly distributed to residents of Moscow to collect new data and information regarding demographics and housing discrimination (as prohibited by the Fair Housing Act) within the City of Moscow. The first event co-sponsored by the Commission was a Social Justice Forum with the Moscow Human Rights Commission in September 2014. In early 2015, the Commission co-sponsored a series of workshops that were held on the University of Idaho campus, entitled “Leases and Landlords”. These workshops involved outreach to students and were setup with a panel of experts from the University of Idaho Legal Aid Clinic and a local landlord. And finally, the Commission co-sponsored a fair housing training

in April 2015, with the Intermountain Fair Housing Council where experts on the Fair Housing Act presented information to realtors, housing providers, and the general public.

In addition to the survey and the series of events co-sponsored by the Commission, City of Moscow's codes, Comprehensive Plan, and other city regulations and policies, were reviewed and analyzed to identify any existing impediments to fair housing within the public sector.

The draft Plan was presented at a noticed public meeting at the regularly scheduled meeting of the Commission on November 5, 2015. The plan was made available for public comment through December 4, 2015. After receipt and consideration of public comments, the Commission presented the final draft plan to the Moscow City Council which duly adopted the Plan on December 21, 2015.

This Analysis of Impediments to Fair Housing and Fair Housing Action Plan was prepared by the City of Moscow Fair Housing Commission. The Commission is currently composed of the following individuals:

Randy Baukol – Chair
Jill Maxwell – Vice Chair
Jamal Lyksett – Secretary
Jeff Dodge – Commissioner
Patrick Johnson - Commissioner
Stetson Holman – Commissioner
Art Bettge - City Council Liaison
Rebecca Couch - City Staff Liaison

4.0 Housing Stock Profile

This profile of housing stock examines the types of housing currently available in Moscow and some of the factors that influence housing availability. This profile is not meant to provide an exhaustive analysis, but rather to give a broad overview of the housing inventory currently existing in Moscow in light of the historic trends that have affected the makeup of the housing stock.

Over the years, available private housing has developed in direct response to immediate demands and has resulted in a mix of housing types and locations that meets the current housing needs of residents. However, various factors have led to periodic temporary shortages of available housing and a tight rental market. Historically, Moscow has experienced a cyclical housing start trend consisting of seven (7) to ten (10) year boom-bust housing construction. Due to the transient nature of a small university town, rental housing makes up a large percentage of the housing units. The rental and sale of housing in Moscow is very competitive as a result of a diversity of ownership. With regard to rentals, no large dominant housing providers are able to influence rental rates. Pricing of rental housing is based on supply and demand, as well as on costs associated with the provision of housing (i.e., interest rates, taxes, insurance, construction material costs, etc.). In the past, rental housing has been provided by local builders and developers who have constructed new housing based on current needs. This has resulted in a variety of small housing projects and very few larger complexes with on-site managers. This process of building smaller projects has served to deter large out-of-town developers from over-building during times of rising demand.

Demand is almost exclusively dependent on the University of Idaho (hereinafter “University”) and its staff and student numbers, a phenomenon that has existed for over 100 years in Moscow. Historically, the University has had steady growth with only occasional dips or spikes. This is contrary to the boom-bust cycle of housing construction in Moscow. Despite this, the two factors of supply and demand have been well balanced, on average, with only temporary periods of shortage



or surplus. Vacancy rates typically are very low (1% or less) during peak occupancy in the fall, but can be 10-20% in student-occupied properties during the summer.

The experience of the last 35 years typifies the historic trends in Moscow. In the early 1980's, the state of Idaho was experiencing an economic recession. Although the country as a whole was also experiencing an economic downturn, the western region was particularly hard hit by the recession. As is often the case during a recession, demand for higher education continued to grow. However, interest rates were very high in the early 1980's and this factor discouraged new construction. In 1986, a tax reform package was enacted by the federal government which, among other things, extended the allowable depreciation period for rental housing. This served to make investing in rental property less attractive. By the end of the 1980's, Moscow was experiencing a housing shortage. This situation began to correct itself in the early 1990's, however, when rising demand drove rental prices up and lower interest rates again made building investment property attractive, returning balance to the housing market.

The Moscow rental market remained reasonably balanced until 1995 when a doubling of out-of-state fee rates mandated by the Idaho State Board of Education went into effect. The resulting two percent drop in enrollment at the University was almost exclusively the result of a loss of out-of-state students, which led to a housing surplus. The effect of this change began to moderate as enrollment grew again at a slow rate. By 2001, a balanced market was again achieved. However, continued growth in 2002 and various changes in University housing resulted in a shortage in the housing supply. Housing construction increased significantly between 2003 and 2009 with over 1,300 units permitted for construction during this time period. Since 2009, single-family home construction has remained at approximately half of historical numbers while multi-family construction has held much closer to historical rates. This activity has resulted in a re-balancing of the market.

While the cost of rental housing in Moscow is higher than many small towns in Idaho where employment and population is limited by a weak resource-based economy, it is very comparable to the housing costs currently existing in major cities in Idaho such as Boise, Coeur d'Alene, and Pocatello.

Housing in Moscow is divided into four main categories: 1) private and rental single-family homes; 2) two-family (duplex) residential structures; 3) commercial multi-family buildings containing more than three dwelling units per building; and 4) on-campus housing (both University-owned and privately owned).

According to the 2013 U.S. Census American Community Survey, there are 10,092 total housing units within the City of Moscow. Single-family homes currently make up just over 37% of the total housing units with 3,769 single-family homes in the community. Interviews with property managers have revealed that the great majority (in excess of 95%) of these homes are owner-occupied. Mobile homes represent only 6.4% of the total housing units with 648 units located within mobile home parks in Moscow. Mobile homes are generally occupied by both owners as well as tenants, although the exact percentages of each are unknown. Two-family residential structures represent just under 10% of the total housing units with 996 two-family dwellings in the City. This category is largely tenant-occupied. Commercial multi-family housing represents the largest share of the total dwelling units at 4,268 units or just over 42% of the total dwelling units in the City. The majority of these properties are located in close proximity to the University and therefore house mostly university students. On-campus housing is available in three categories: 1) fraternities and sororities, which have a maximum occupancy of 1,516 persons; 2) residence halls, which have a maximum occupancy of 2,020 persons; and 3) apartment units, which are made available to university students in special categories, such as family housing and students who are age 19 and older. These units total 225 apartments, ranging in size from studios to three bedrooms.

5.0 Survey Analysis

In March 2014, the Commission contracted with the University of Idaho Department of Geography to prepare a demographic profile of Moscow's population and conduct a mailed survey of selected portions of the city to further explore impediments to fair housing that may exist in the private sector. The survey directed different questions toward homeowners, renters, and students on campus to pinpoint housing qualities specific to different groups. This survey style expanded on the 2003 Analysis of Impediments survey by allowing respondents to rate experiences and include multiple answers to questions regarding housing choice and factors impeding housing decisions. The data was analyzed to identify any impediments to fair housing choice that may have been encountered by residents of private housing in Moscow. For the services performed, pursuant to the agreement for survey design and analysis between the City and University, the University was compensated approximately \$5,800.

5.1 Data

Population data used for this project was derived from the U.S. 2010 Census Redistricting File and census block polygons are from U.S. Census TIGER files. ESRI Arc view 3.2 and Statistical Package for the Social Sciences (hereinafter "SPSS") software were used to process the census data. Address information for survey recipients was geocoded from the full residential address list provided by the City to the University for this project. Homeowner's exemption data, which is included in the parcel database and owned by Latah County, was utilized to form three clusters of parcels for mailing the survey.

5.2 Sampling Method

After visualizing the data and discerning that the demographic data split itself along the N-S and E-W axes of the City, a fishnet was used in ArcGIS to create a quadrant grid. These quadrants are a larger sampling resolution than was used in the 2003 study, but smaller resolution was difficult to obtain as the entire pool of residential addresses was sampled from, not just certain blocks. Three clusters emerged from the block-level census data and the parcel data provided by the City after running K-means clustering and the clusters generally split along homeowner, renter and income lines. Homeowners were determined by the presence of maximum homeowners exemptions claimed by a parcel, a value found on the Latah County Tax Assessor's website. The City printed and mailed 400 surveys, implementing a color scheme based on the quadrant grid to determine which section of the City from which surveys returned. A link was provided within the cover letter of the mailed survey to give recipients the option to respond online. The link to

the online survey was emailed to 1,995 University of Idaho student email addresses. Those who completed the survey online selected which quadrant of the City they reside in from a map that was provided with the survey. The following data types were considered in the original statistical assessment: female-head of household, racial demographics, median income, renter-occupied, taxable amount, and homeowner's exemptions.

The number of addresses pulled from each cluster was determined by the ratio of addresses in each cluster to the whole number of residential addresses, related to the 400 addresses for mailing. The amount of surveys mailed to each cluster was determined according to the proportion of the total residential addresses each cluster represented, ArcGIS's random number generator tool was utilized to complete this step. The random number generator was used to create the 400 mailing addresses. The 1,995 student addresses were provided by the University Registrar's Office. The Registrar's Office has a limit of 2,000 email addresses that can be provided for survey type purposes, 5 individuals previously opted out of SurveyMonkey emails, resulting in the 1,995 email addresses that were sent the survey.

5.3 Survey Results Summary

Of the 400 surveys mailed, 87 were completed for a response rate of 22%. Of the 1,995 surveys emailed, 68 were completed for a response rate of 3%. The overall response rate for the survey was 6%, with a total of 155 responses. The number of individuals that responded to each question varied and many respondents skipped questions. The full compilation of survey results including the total number of respondents to each question is shown on the Fair Housing Survey Results, Appendix A. The 22% response rate from mailed surveys is statistically valid, but when combined with the 3.4% response rate from emailed surveys it results in an invalid 6% overall response rate for the survey. Additionally, the results show very little diversity among respondents in regard

to race, nationality and sexual orientation.

There were 42 total questions, with some questions specific to renters, homeowners and students only. The majority of survey respondents were in the age ranges of 18-24 and 25-34, but responses were received from all age ranges (see Figure 1). The average household size of respondents is 2.4 people and a greater number of respondents rent their home (63%) than own their home (37%), the distribution of renters and owners within each quadrant is shown in Figure 2.

Of the 155 households that responded, 17 (11%) have an individual in the household with a disability. 37% of respondents have a monthly net (take-home) income of less than \$1,000/month, with 20% taking home more than \$3,000/month. Tables 1 through 7 below provide respondent data regarding race, national origin, sexual orientation, gender identity/expression, religion, having minor children, and being a university student (see Figure 3 for the distribution of students within each quadrant).

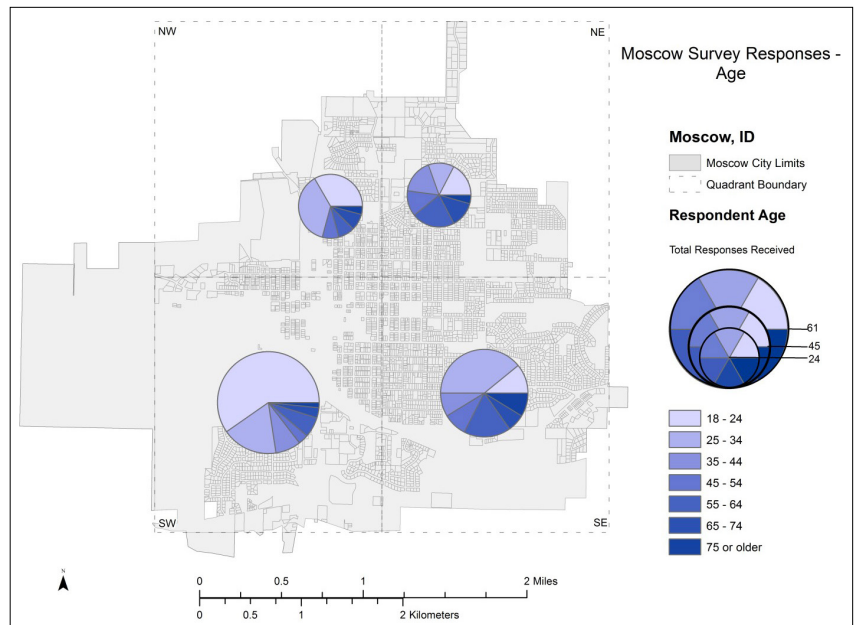


Figure 1: Distribution of respondents by age within each quadrant.

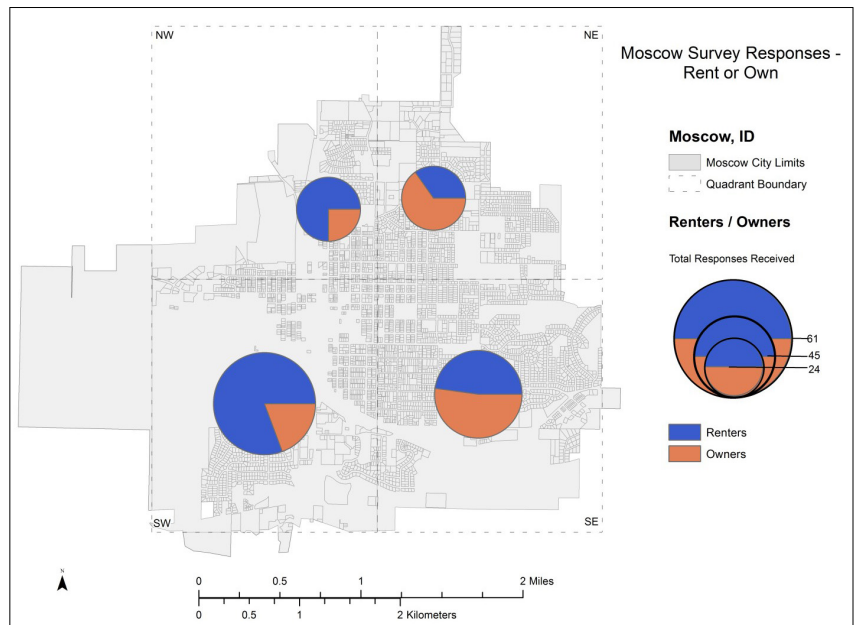


Figure 2: Distribution of renter and owner respondents within each quadrant.

Table 1. What is your race?

Hispanic or Latino	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races
1%	93%	1%	0%	2%	1%	2%

Table 2. Are you a U.S. Citizen?

Yes	No
98%	2%

Table 3. What is your sexual orientation?

Bisexual	Heterosexual	Homosexual	Other
5%	92%	2%	1%

Table 4. What is your gender identity/expression?

Male	Female	Transgender	Other
43%	56%	1%	0%

Table 5. What is your religion?

None	Christian	Islam	Judaism	Atheist	Agnostic	Other
27%	58%	0%	1%	9%	2%	0%

Table 6. Do you have minor children?

Yes	No
21%	79%

Table 7. Are you a university student?

No	Undergraduate	Graduate
45%	33%	22%

Survey respondents were asked to rate the importance of eleven different factors from 0 (no effect) to 5 (significant effect) in limiting their choice of housing in Moscow. This question was asked first of all respondents, then homeowners and renters were asked separately to identify any differences among the two groups. Each time the same factors were rated by the three different groups, income was identified as having the highest significant effect on limiting one's choice of housing. Specific to renters, the second and third highest impediments were having pets and being a student. The majority of respondents indicated that the factors listed either had no effect (0) or were not applicable (N/A).

Nearly all survey respondents (147 out of 155) answered the question of whether or not they think housing discrimination is an issue in Moscow, with 21% responding 'yes'. Figure 4 reflects that the perception of housing discrimination among respondents is fairly equal throughout each of the four quadrants. Interestingly, only 5% of total survey respondents (8 individuals) indicated that they have personally felt discriminated against. One individual indicated they

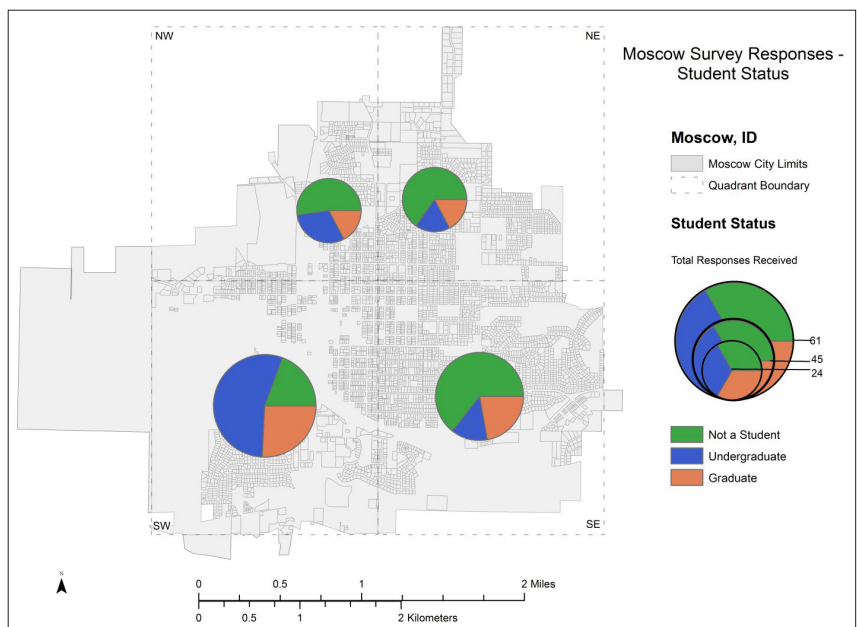


Figure 3: Distribution of student respondents within each quadrant.

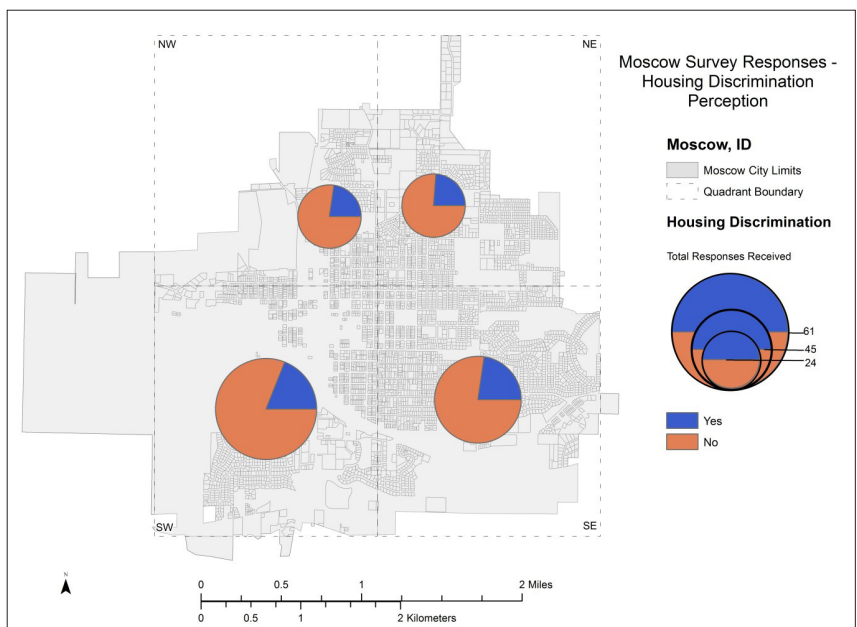


Figure 4: Distribution of responses to the question "do you think housing discrimination is an issue in Moscow?" within each quadrant.

had felt discriminated against due to being a minority household, and one also for being in a female-headed household; two individuals felt discriminated against for ‘other’ reasons. 6% of respondents indicated that they are aware of zoning or land-use laws that create barriers to fair housing or encourage housing segregation (explanations from those respondents are found in Table 3 of Appendix A). The majority of respondents who answered the question regarding lenders targeting specific groups felt that lenders target minority households (67% of 15 individuals) and female-headed households (13% of 15 individuals).

The majority of survey respondents found their current housing unit by looking online (30%) or with the help of a realtor (22%). Nearly all respondents (151 out of 155) answered the survey question that allowed them to select factors that influence their choice of housing. The results from this question, ranked from greatest influence to least influence are shown in Table 8 below.

Table 8. What factors influence your choice of housing? (mark all that apply)	
Price	89%
Size of housing unit	70%
Condition of property	68%
Proximity to work, daycare, or school	62%
Safety of neighborhood	52%
Accessibility	40%
Pet-friendly	38%
Family-friendly community	34%
Proximity to parks	22%
Proximity to nightlife	16%
Provision for children or dependents	16%
Availability of transportation	10%

When asked if they could/would move to any other part of the city if the housing was available and affordable for them, 62% of respondents said 'yes' and 38% said 'no'. Of those who said 'no', the top factors influencing their decision to not move were proximity to work, daycare or school; condition of the property; safety of the neighborhood; price, and size of the housing unit. Access to public transportation is available to 74% of respondents, but the majority of respondents drive their own car (53%) for transportation. 33% walk and 10% ride bikes.

Among homeowners who responded to the survey, 61% indicated their annual net (take-home) household income is more than \$42,000/year. The majority of homeowners indicated that it was easy to secure a home loan, and that they have owned a home previously (43% of the previously owned homes were in Moscow).

Of the respondents who rent their home, 62% share their home or apartment with at least one other person, but the majority of "roommates" are not related. There were 48 renters who provided a response to the annual net household income question. 55% of those (26 individuals) indicated an annual net (take-home) household income of less than \$18,000/year. The average annual rent payment for responding renters was \$7,060; 39.2% of an \$18,000 annual income. All but two of the individuals who answered the question about annual net household income were students. The income to rent ratio is obviously skewed because of the number of student renters who responded and the fact that students may not have any (or very little) source of income. The type of rental that renters live in is split between a traditional apartment complex (51%) and a house/duplex (41%). 80% of responding renters are not first-time renters, with the majority (70%) having had a former rental located in Moscow.

48% of student respondents live on campus, with 50% of those living in a residence hall, 31% living in a sorority or fraternity house, and 19% responding "other" which could include family housing on-campus apartments. Factors that affect the student's choice of on-campus housing include price/rent (50%), proximity to campus resources (31%), and 'other' (19%).

In summary, the survey results indicate that there is a perception of housing discrimination in Moscow, and a perception of income discrimination. Additionally, the renter income to expense ratio for renters who responded reaches "housing cost-burden" levels. However, due to the low response rate of this survey and the lack of diversity among respondents there are no strong conclusions that can be inferred from the data indicating there is or is not a housing discrimination issue in Moscow, as regulated by the Fair Housing Act.

6.0 Analysis of Impediments and Action Plan

6.1 Public Sector Review

In preparing the review of the public sector, the Commission examined the City of Moscow Municipal Code, the Comprehensive Plan, International Building Code, City Employment Manuals, and hearing policies for possible impediments to fair housing.

6.1.1 Comprehensive Plan

Chapter 2 of the City of Moscow Comprehensive Plan (hereinafter “the Plan”), adopted in 2009, states a goal for the housing element of the Plan as follows: “Encourage a variety of housing types to meet the needs of residents of all ages and economic ability.” The Plan contains objectives and implementation actions that acknowledge the need to provide a variety of housing types to meet the diverse needs of the community, as well as the need to develop zoning that allows for accessory dwelling units, identify areas for residential infill opportunities, and to include a variety of regulatory incentives for the creation of affordable housing opportunities. Many of these concepts have been addressed within the Zoning Code since the adoption of the Plan.

The housing element (Section 2.2) within the Plan includes an overview of housing types currently available in Moscow, and provides projections for population growth and anticipated increases in housing demand in the future. It also discusses potential opportunities and strategies for creating, maintaining and incentivizing affordable housing in the community. The Plan advises that often the most easily implemented strategies are those that can be controlled through land use and development codes, such as allowance of infill development and accessory units which provide more housing options by increasing densities (lowering the cost of land associated with a dwelling unit), and supplement a homeowner’s mortgage payment. The Plan suggests incentives to be built into codes that encourage developers to construct affordable housing by allowing



density bonuses, alternate housing types, additional height, reduced fees, or priority plan review. Additionally, zoning could be amended to require the provision of affordable housing within new developments, a technique that is often called inclusionary zoning. The Plan cautions against being overly restrictive with zoning codes so as to not inadvertently pose impediments to the development or maintenance of affordable housing by increasing costs. Regulations that limit the ability for potential home buyers to obtain a loan on a property due to a nonconforming status of the lot, structure, or use can be an impediment to affordable housing in a community. The Plan describes that the establishment of programs and enforcement are necessary to be effective in maintaining affordable housing when a property is sold. A mechanism is needed to restrict the unit from being sold at market rate. Additionally, programs can be developed to fund the construction and rehabilitation of affordable units through trust funds. The Plan outlines other options including deed restrictions or the creation of land trusts – arrangements in which a private non-profit organization holds ownership of the land, and/or community housing funds that can reduce the purchase price to home ownership providing housing buy downs that are repaid upon the future sale of the property. The Plan recognizes that these types of programs require third party involvement and therefore partnerships between local government and other public or private organizations.

The Comprehensive Plan Land Use Designation Map reflects diversity in location of housing and in particular, multi-family housing. Areas designated as Auto-Urban Residential, Medium Density (multiple-family lots and manufactured homes) are primarily concentrated south of the central S.H. 8 corridor and in the northwest region of the City. The existing zoning of these areas is largely R-3, Medium Density Residential and R-4 Multiple-Family Residential. Urban Residential, Medium Density are generally located in neighborhoods that abut downtown where there is a high incidence of multiple-family dwellings. Multiple-Family Residential (R-4) is the current zoning of these areas. Suburban Residential and Auto-Urban Residential areas that primarily consist of single family dwelling lots (varying in parcel sizes), are located in the northern and eastern regions of the community.

The differences in distribution of low-, medium-, and high-density residential areas are important because only multi-family units that house four separate families or more are covered under the U.S. Department of Housing and Urban Development building guidelines. Single family residential homes are more likely to be exempt from the other Fair Housing Act protections.

ACTION ITEM NO. 1: City Comprehensive Plan

The City of Moscow's Comprehensive Plan adequately addresses the need for varying types of housing within the City and also provides an array of opportunities and ideas for advancing affordable housing within the community, some of which have been completed since the adoption of the 2009 Plan. However, there are several suggestions and actions outlined within the Plan that have not been implemented that could provide tremendous benefit to the City of Moscow in terms of providing and maintaining affordable housing.

Actions to be taken in response to this impediment includes research and development of appropriate programs and partnership opportunities that will assist in the provision and maintenance of affordable housing, as suggested in the Comprehensive Plan. Programs may include enforcement policies to ensure resale of affordable housing properties below market rates, funding programs for construction and rehabilitation of affordable units, or third party arrangements including deed restrictions and creation of land trusts that reduce the purchase price of home ownership. Research conducted should include examination of such programs within other municipalities and should advise on the potential level of success for such incentives in Moscow.



6.1.2 Zoning Code

The City of Moscow Zoning Code promotes the creation of affordable housing while preserving the property rights and quality of life of the city's residents. Many code provisions exist that assist with creating, maintaining and incentivizing affordable housing in Moscow such as smaller lot size requirements, the reduction of street widths, and set back requirements and flexibility through the Planned Unit Development process. The Planned Unit Development section of the Zoning Code allows the creation of higher-density, innovative and economical developments upon single lots or in subdivisions that would not be allowed by the underlying zoning district. Other related and recent Zoning Code amendments include the allowance of accessory dwelling units in all zones, and residential uses being permitted above or behind commercial uses in the Motor Business and Commercial Business Zones to encourage infill development. These changes assist in reducing the typical housing development cost and have provided flexibility in development methods to lower the cost of housing and increase the variety of housing that is available.

The Zoning Code defines a nonconforming structure as a lawful structure that exists on the effective date of adoption or amendment of the Zoning Code that could not be built under the terms of the Zoning Code by reason of standards for area, lot coverage, height, yards, the structure's location on the lot, or other requirements concerning the structure. The Zoning Code allows such structure to be retained if it remains otherwise lawful, subject to the provision that should the nonconforming structure be destroyed by any means to an extent of more than 70% of the replacement cost of the whole structure at the time of destruction, it shall not be reconstructed except in conformity with the provisions of the Zoning Code. This code provision may limit the ability for potential home buyers to obtain a loan on a property due to a nonconforming status of the structure, and can be an impediment to affordable housing in the community.

The Zoning Code definition of "Day Care Facility" could be considered an impediment to fair housing. The definition of "Day Care Facility" includes foster homes, which subjects foster homes to zoning and location limitations that may violate the spirit of the Fair Housing Act's prohibition against discrimination based on familial status.

ACTION ITEM NO. 2: City Zoning Code

The nonconforming structure provision within the Zoning Code may limit the ability for potential buyers to obtain a loan on a property due to a nonconforming status of the structure, and can be an impediment to affordable housing in the community.

Action to be taken in response to this impediment includes amending the nonconforming section of the Zoning Code to allow for the reconstruction of a nonconforming structure, as it existed prior to destruction.

ACTION ITEM NO. 3: City Zoning Code

The definition of “Day Care Facility” within the Zoning Code specifically includes foster homes, thereby subjecting foster homes to zoning and location limitations. Such limitation may violate the Fair Housing Act should it be enforced to prevent the location of a foster home outside of specific portions of the city.

Action to be taken in response to this impediment includes amending the Zoning Code so that the definition of “Day Care Facility” no longer includes foster homes.

6.1.3 Subdivision Code

The Subdivision Code regulates the division and development of land within the city and the related required public improvements such as streets, sidewalks and public utilities. All developments, regardless of type or density, are required to provide future residents with adequate public improvements including streets, sidewalks, utilities, stormwater detention systems and parkland dedications. These public improvement standards are applied uniformly throughout the community to ensure the delivery of equitable public services. No impediments to fair housing were identified within the Subdivision Code.

6.1.4 Building Codes

The City of Moscow was required by the State of Idaho to adopt the International Building Code (hereinafter “IBC”). The IBC states that it “better reflect[s] the requirements of both the ADA [Americans with Disabilities Act] and the FHA [Fair Housing Act].”

While the IBC does provide a closer alignment with many elements of the Americans with Disabilities Act and the Fair Housing Act, the IBC also includes a more stringent fire sprinkler requirement for residential care/assisted living facilities. Fire sprinklers are required in such facilities as outlined in IBC Sections 310 & 903, the adoption of which is mandated by the State of Idaho. Such sprinklers add a cost of between \$2.00 and \$2.50 per square foot to the cost of construction of a facility. Therefore, this requirement results in an increase in cost of about \$3,000 to \$3,750 for a 1,500 square foot facility. While this requirement may present an additional cost to the development of residential assisted living facilities, the additional safety of such improvements would appear prudent in such facilities. Because the City does not have the ability to lessen the life safety-related requirements of the IBC, no impediments to fair housing were identified within the building codes.

6.1.5 Municipal Services

The Fair Housing Act promotes the non-discriminatory distribution of public services such as parks, streets, public transportation, recreational opportunities, police protection, fire protection, street lighting and trash collection throughout the community. Service response times of the fire department appear to be equally as rapid to multiple family housing developments as to single family homes and police services are equitably provided throughout the community. Therefore, no impediments to fair housing were identified related to public services.

6.1.6 Employment, Housing and Transportation

Public transit service in Moscow is ADA accessible and the majority of multiple family housing is located in areas near the transit route and local employers. The Commission found no significant impediments to fair housing related to the housing and employment transportation linkage.

6.1.7 Administrative Policies

Resolution 2001-05, passed by the City Council in February of 2001, provides that the City of Moscow will assist all persons who feel they have been discriminated against because of race, color, religion, sex, national origin, disability or familial status to promote compliance with the Fair Housing Act 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. This resolution represents a commitment by the City to encourage property owners, developers, and builders to become aware of their respective responsibilities and rights under the federal fair housing laws and amendments.

Ordinance No. 2013-06, passed by the City Council in April of 2013, provides that the City of Moscow prohibits housing discrimination on the basis of an individual's sexual orientation or gender expression/identity. This prohibition is in addition to state and federal laws that prohibit housing discrimination on the basis of race, color, age, sex, national origin, familial status, veteran's status, and/or disability.

Furthermore, from 2009 to 2015, the City of Moscow distributed funds to organizations and programs that work to promote/provide affordable housing, an amount totaling \$43,965. The most recent recipient of these funds in 2015 was The Moscow Affordable Housing Trust. No impediments to fair housing were identified with regards to the City of Moscow's administrative policies.

6.1.8 Property Tax Policies

Property tax policies are controlled by the State of Idaho and locally administered and collected by Latah County. Established property tax relief programs such as the State of Idaho Tax Commissions Property Tax Reduction Program are administered within the community by the Latah County Assessor. Tax policies may have a significant effect on the construction of housing, and have the potential to increase or reduce the development of multifamily housing in the community.

ACTION ITEM NO. 4: Tax Policy

Tax policies have the potential to reduce the development cost of accessible and affordable housing in Moscow.

Action to be taken in response to this impediment includes increasing awareness of State of Idaho affordable housing tax credit programs that are available by creating educational materials and distributing them accordingly.

6.1.9 Planning and Zoning Commission and Board of Adjustment

The Planning and Zoning Commission and Board of Adjustment members are selected in compliance with State of Idaho and City Code. Members are appointed by the Mayor with the advice and approval of the Council without respect to political affiliation. The Planning and Zoning Commission and Board of Adjustment consist of members that reflect the diversity of the community's population. The Commission and Board meetings are open to the public with accommodations for persons with disabilities made available. Therefore, the Commission finds no impediments to fair housing within the Planning and Zoning Commission and Board of Adjustment.

6.1.10 Private Sector Review

The Fair Housing Commission conducted a survey during the summer of 2001 of the following five local groups of fair housing stakeholders: 1) architects, builders, contractors, developers, and engineers; 2) lenders; 3) property managers and landlords; 4) realtors and real estate brokers;

and 5) service agencies. The Commission surveyed between five and twenty-five percent of the individuals included in each of these stakeholder groups. The purpose of the survey was to identify what, if any, impediments to fair housing exist in the private sector in the Moscow area. Detailed questions concerning individuals' understanding of and experience with fair housing issues were posed. Although a majority of the stakeholders surveyed (22 of 33) indicated that their knowledge of the Fair Housing Act requirements as they relate to their particular jobs was "moderate" or "substantial," approximately one-half (16 of 33) also indicated that their need for more information regarding the Fair Housing Act requirements was "moderate" or substantial." These survey results reveal that while numerous stakeholders involved in Moscow's housing market indicated that they have received fair housing training and that they feel comfortable with their knowledge and understanding of the Fair Housing Act, a majority of those surveyed perceived a need for further education. This implies that in 2001 an impediment to fair housing existed in the private sector due to a lack of education. No follow-up survey of the private sector has been completed since 2001.

In 2001, the Commission also contacted local publishers that advertise housing in order to acquire information regarding any policies or procedures that each publisher may employ in screening the content of housing advertisements.

The Commission took action promptly upon review and summary of the survey results from 2001. The Commission now every couple of years co-sponsors a fair housing training with the Intermountain Fair Housing Council. Experts on the Fair Housing Act present information at these trainings to realtors, housing providers, and the general public who are all invited to attend via mass mailings, advertisements, and flyers distributed throughout town. Additionally, Fair Housing Design Manuals (published by the United States Department of Housing and Urban Develop-

ment) have been purchased and the Commission provides them to University of Idaho students within the college of Art and Architecture upon request.

In 2014, the Commission began working on education and information dissemination for landlords and tenants regarding tenant/landlord laws in Idaho and rights and responsibilities of both parties. Workshops have been held on campus as they are co-sponsored by the Associated Students of the University of Idaho (ASUI). Attendees are invited to ask questions of the panel of professionals, including representatives from Idaho Legal Aid Clinic at the University of Idaho and local landlords. At present there has not been a focus on fair or affordable housing topics at these workshops. Information sharing in regards to the Fair Housing Act should also be provided at these sessions to raise awareness among the college student population of fair housing practices.

ACTION ITEM NO. 5: Survey

A survey of professionals in the private sector (architects, engineers, contractors, realtors, lenders, property managers, etc.) has not been conducted since 2001. A survey of these professionals informs whether or not additional or different fair housing related training is necessary for the community of Moscow to ensure these professionals have the knowledge to provide services in accordance with the Fair Housing Act, and the Fair Housing Design Manual.

Action to be taken includes conducting a survey of the private sector, similar to the survey completed in 2001 in order to be aware of training needs in our community and areas where the Commission can assist in providing better information dissemination.

ACTION ITEM NO. 6: Training

To raise awareness and increase education about fair housing practices and to ensure the City of Moscow is providing housing services to the community in accordance with the Fair Housing Act, it is essential for training opportunities to be made available on an annual or biennial basis.

Action to be taken includes the promotion of educational opportunities for housing providers, lenders, realtors, fair housing advocates, and the general public, including the continuation of annual or biennial training sessions in cooperation with the Intermountain Fair Housing Council and Idaho Housing and Urban Development, as well as tenant/landlord informational sessions including information on fair housing practices.

7.0 Fair Housing Enforcement

The Fair Housing Act protects individuals from housing discrimination throughout the entire country. The Act protects citizens from housing discrimination on the basis of race, color, religion, sex, national origin, familial status, and disability. The Act designates the U.S. Department of Housing and Urban Development (HUD) as the government agency that is empowered to enforce the requirements of the Act. This federal agency receives fair housing complaints, investigates complaints, and attempts to conciliate an out-of-court settlement. If the matter cannot be resolved through settlement, HUD may file a court complaint on behalf of the complainant and thereby seek a judicial remedy by referring the complaint to the U. S. Department of Justice for litigation. The requirements of the Act may also be enforced through private litigation.

To assist with education and outreach and intake of complaints, HUD provides grants to non-profit fair housing organizations throughout the country. In Idaho, HUD helps to fund the Intermountain Fair Housing Council (IFHC) located in Boise. The Council, established in 1996, conducts education and outreach activities concerning the requirements of the Fair Housing Act throughout the state, receives and investigates complaints from individuals, and refers complaints to HUD for further investigation. Between 2009 and 2015, 80 fair housing related calls were received by IFHC from Moscow. Of those calls, 55 were jurisdictional fair housing cases, meaning that they met the criteria to prove a violation of the Fair Housing Act. All but four of the calls were regarding rental housing, two of the cases were design and construction related and two were related to the sale/purchase of a home. The basis for the violations were predominantly disability accommodations, then familial status, and race. IFHC refers cases to HUD if the case is determined to be a violation of the Fair Housing Act and cannot be conciliated or mediated in any other way. Complaints that are not filed with HUD are most often handled in one of two ways: the complainant elects to handle the issue privately, or it is determined by IFHC that there is no violation of the Fair Housing Act and staff assists in mediating the issue with the housing provider.

Within the last five years (2010 - 2015), approximately 350 fair housing cases were filed with HUD for the State of Idaho. Ten of the state-wide complaints (2.8%) were located in Moscow. Of those, five were regarding failure to make reasonable accommodations for a disability. Three cases were regarding familial status including refusal to rent, discrimination in terms, conditions, or services, and discriminatory advertising. Two of the cases were three-fold with the bases for the complaint being race, familial status, and color. The issue with these cases included discriminatory refusal to rent and discrimination in services and facilities relating to rental.

8.0 Affordable Housing

In Idaho, individuals are also protected from housing discrimination under the Idaho Human Rights Act. The Human Rights Act protects individuals from housing discrimination on the bases of race, color, religion, sex, national origin, and disability. The Human Rights Act empowers the Idaho Human Rights Commission as the state enforcement agency. The Commission receives and investigates complaints to determine if the complaint is justified (violates the Fair Housing Act). If a complaint is justified, the Commission attempts to conciliate an out-of-court settlement of the complaint. If the complaint cannot be settled, the Commission may file a court complaint on behalf of the complainant and thereby seek a judicial remedy.

The issue of affordability implicates fair housing rights because it directly affects housing choice. Financial limitations affect a person's choice of the type and location of housing which may constitute a significant impact on community diversity due to the disparity of per capita income between the various racial and ethnic groups, and the disabled and non-disabled populations.

According to the 2014 Statewide Housing Needs Survey for Idaho, conducted by BBC Research & Consulting, the majority of stakeholders who responded (73%) felt that affordable housing needs had increased over the previous three years. Stakeholders surveyed included representatives from many industries and organizations in lending, residential sales, rental property owners, local government, landlord/tenant services, affordable housing development, and property management. When asked how homeless needs had changed in the previous two to three years, 32% of stakeholders believed homeless needs had stayed the same, while 63% felt that homeless needs had increased during the previous years. Survey respondents identified the greatest unmet housing needs in their area and half (50%) of the responding stakeholders felt that rental housing for households at 30 percent of the area median income (AMI) or less was a top unmet housing need. Other important unmet housing needs identified by stakeholders were homeownership opportunities for low-income residents (42%), rental housing for households at 80 percent AMI or

less (38%), and housing for homeless families (29%). Stakeholders who indicated more opportunities for home ownership should be a priority for HUD block grant funding elaborated on types of housing that should be available as follows: low income housing (specifically for families), single family homes between \$100,000 and \$150,000, and assistance with loans and down payments. And finally stakeholders identified the following barriers to affordable housing: regulations, lack of affordable housing, waiting lists, costs and availability of land, and education.

The lack of available affordable housing in a community may constitute a formidable barrier to fair housing and promote a segregated community. Affordable housing is defined as that for which a family spends no more than 30 percent of their income. According to HUD, families who spend more than 30% of the total household income on housing are considered to be “cost-burdened”.

The Moscow Affordable Housing Trust (MAHT) completed a housing market analysis for the City of Moscow and Latah County in January 2015. This analysis shed light on the fact that housing costs in the City and County are rising faster than median family income, with the average sale price of a home increasing 55% over the last decade (2004 - 2014). Fair market rent per month for a 3-bedroom rental has increased 64.5% while median family income for Latah County has only increased 18.4% during that same time period. Additionally, the analysis discovered that Moscow’s challenge in providing workforce housing is more similar to the resort communities in the state than the larger metropolitan areas because there is limited supply of affordable homeownership opportunities. The City of Moscow is aware of this problem and has been researching and taking action for a decade because of data indicating a significant number of households are housing cost-burdened. A survey of citizen perceptions of affordable housing costs corroborated the data. There is a pent-up demand for affordable ownership opportunities among the City’s renters. The absorption rate for affordably priced single family homes can be estimated based on projected population growth at eight homes per year and based on industry professional estimates between five and ten homes per year. Key findings of this survey include that there appears to be more households able to qualify for a mortgage of \$150,000 - 170,000 than there are houses for sale in this price range. Further, many prospective buyers are willing to consider a smaller “starter” home that they would outgrow and they expect to own this “starter” home about ten years. There appears to be a market for multiple formats of this smaller home, including attached/detached and single/multiple story with either private yard or common open space.

9.0 Conclusion

This Analysis of Impediments to Fair Housing and Fair Housing Action Plan was prepared over a two-year period beginning in early 2013. It is the result of a comprehensive study of both the public and private sectors in Moscow, Idaho to determine whether impediments to fair housing exist and to develop a plan by which any impediments identified can be remedied.

The work on the plan was accomplished by the members of the City of Moscow Fair Housing Commission and a team of demographers from the University of Idaho Department of Geography. The analysis was completed through the collection of data and direct examination of city documents and demographic data.

The results of this analysis found very few systemic impediments to fair housing exist in the public sector. Action items included in this plan either address existing impediments to fair housing or encourage the provision and maintenance of affordable housing. Some impediments to fair housing were identified within the City of Moscow's ordinances, codes, policies and procedures. In the private sector it was observed that additional data collection will be necessary to determine types and amount of training the Commission can assist in providing to the Moscow community of housing professionals. The Commission's recent actions of co-sponsoring fair housing trainings have been positive and need to continue in order to increase awareness of the protections provided by the Fair Housing Act for both tenants and housing providers.

Where impediments were identified, action items were developed aimed at resolving the impediments. The task of resolving these impediments will be the ongoing work of the Fair Housing Commission. An additional challenge for the Commission will be to find an effective educational method to deepen the understanding of the Fair Housing Act and to attract individuals to those educational opportunities and to improve access to necessary fair housing resources.

Appendix A

Fair Housing Survey Results (2014)



Fair Housing Survey – RESULTS

155 completed surveys were received. “No Responses” were removed, % reflects those who responded to each individual question.

1. Please mark which age group you are in (note: respondent must be at least 18 years of age) 155 responses	18-24 35%	25-34 27%	35-44 8%	45-54 7%	55-64 12%	65-74 6%	75 or older 5%
2. How many people currently live in your household, including yourself? 150 responses	Average: 2.4 (excluding 3 living group households) Average: 3.7 (including 3 living group households with 60+ people)						
3. Are you the head of this household? (unmarried, paying more than 50% of cost to maintain home, and have 1 or more dependent living with you for more than half the year) 153 responses	Yes 49%	No 51%					
4. Do you rent or own this housing unit? 155 responses	Rent 63%	Own 37%					
5. What is your race? 153 responses	Hispanic or Latino			1%			
	White			93%			
	Black or African American			1%			
	Native Hawaiian or Other Pacific Islander			0%			
	Asian			2%			
	American Indian or Alaska Native			1%			
	Two or More Races			2%			
6. What is your sexual orientation? 150 responses	Bisexual 5%	Heterosexual 92%		Homosexual 2%	Other: 1%		
7. What is your gender identity/expression? 151 responses	Male 43%	Female 56%	Transgender 1%	Other: 0%			
8. What is your religion? 153 responses	None 27%	Christian 58%	Islam 0%	Judaism 1%	Atheist 9%	Agnostic 5%	
9. Are you a U.S. Citizen? 152 responses	Yes 98%	No 2%					
10. Do you have minor children? (under 18 years of age) If yes, what are their ages? 155 responses	Yes 21%	No 79%					
11. Are you a university student? 153 responses	No 45%	Undergraduate 33%		Graduate 22%			

12. Do you have any pets? 155 responses	Yes 46%	No 54%					
13. How many people in your household have a disability, including yourself?	17 Total						
14. What is YOUR monthly net (take-home) income? 153 responses	Less than \$1,000/month	37%	\$1,000 - \$1,500/month	10%			
	\$1,500 - \$2,000/month	16%	\$2,000 - \$2,500/month	7%			
	\$2,500 - \$3,000/month	10%	More than \$3,000/month	20%			
15. Please rate each factor from 0 (no effect) to 5 (significant effect) in limiting your choice of housing in Moscow, Idaho, in any way. 148 responses							
	N/A	0	1	2	3	4	5
Age	10%	55%	10%	6%	10%	4%	5%
Race	11%	81%	1%	3%	2%	0%	2%
Sexual Orientation	12%	78%	2%	1%	3%	2%	2%
Gender Identity	12%	76%	3%	1%	3%	2%	3%
Religion	12%	74%	8%	3%	1%	1%	1%
National Origin	12%	81%	4%	0%	1%	0%	2%
Having Minor Children	22%	60%	4%	5%	7%	1%	1%
Being a Student	18%	40%	5%	9%	9%	7%	12%
Having Pets	13%	39%	5%	7%	8%	13%	14%
A Disability	23%	64%	1%	3%	4%	3%	2%
Income	7%	26%	3%	9%	13%	17%	25%

HOMEOWNERS (If you rent, please proceed to the renters section)

16. What is your annual net (take-home) HOUSEHOLD income? 59 responses	Less than \$18,000/year	8%	\$18,000 – \$24,000/year	8%
	\$24,000 - \$30,000/year	10%	\$30,000 - \$36,000/year	3%
	\$36,000 - \$42,000/year	10%	More than \$42,000/year	61%
17. Please select the level of difficulty experienced in securing a home loan. 53 responses	Easy 64%	Moderate 25%	Difficult 11%	
18. Have you owned a house previously? 57 responses	Yes 70%	No 30%		
19. Was your former house located in Moscow? If not, please tell us where the house was located. 40 responses	Yes 43%	No 57%	See Table 1 on page 9 for former home locations.	

20. Please rate each factor from 0 (no effect) to 5 (significant effect) in limiting your choice of housing in your PREVIOUS town/city. 22 responses							
	N/A	0	1	2	3	4	5
Age	14%	82%	0%	0%	4%	0%	0%
Race	14%	82%	0%	0%	0%	0%	4%
Sexual Orientation	18%	77%	0%	0%	0%	0%	5%
Gender Identity	18%	77%	0%	0%	0%	0%	5%
Religion	14%	82%	0%	0%	0%	0%	4%
National Origin	14%	82%	0%	0%	0%	0%	5%
Having Minor Children	14%	73%	9%	4%	0%	0%	0%
Being a Student	32%	59%	0%	5%	5%	0%	0%
Having Pets	23%	59%	5%	9%	0%	0%	4%
A Disability	27%	73%	0%	0%	0%	0%	0%
Income	14%	33%	4%	10%	10%	10%	19%

RENTERS (homeowners and students living on campus please skip this section)

21. Do you share your rental space (apartment or house) with at least one other person? 81 responses	Yes 62%	No 38%		
22. Are you related to the other individual(s) you share a rental space with? (related shall mean persons related by blood, marriage, adoption, and/or guardianship or other duly authorized relationship) 51 responses	Yes 37%	No 63%		
23. What is your annual net (take-home) HOUSEHOLD income? 48 responses	Less than 18,000/year \$24,000 - \$30,000/year \$36,000 - \$42,000/year	55% 13% 4%	\$18,000 – \$24,000/year \$30,000 - \$36,000/year More than \$42,000/year	8% 10% 10%
24. How much do YOU or YOUR HOUSEHOLD (if related) pay for rent per month?	Average annual rent payment = \$7,059.79 39.2% of 18,000/year income			
25. What type of rental do you live in? 78 responses	Traditional Apartment Complex 51%	Boarding House (rented room within a house) 1%	House/Duplex 41%	Other: 7%
26. Are you a first-time renter? 79 responses	Yes 20%	No 80%		

27. Was your former rental located in Moscow? 57 responses	Yes 70%	No 30%	See Table 2 on page 8 for former rental home locations.				
28. Please rate each factor from 0 (no effect) to 5 (significant effect) in limiting your choice of housing in your PREVIOUS town/city. 22 responses							
	N/A	0	1	2	3	4	5
Age	5%	76%	9%	0%	5%	5%	0%
Race	5%	90%	0%	5%	0%	0%	4%
Sexual Orientation	5%	85%	0%	5%	0%	0%	5%
Gender Identity	5%	85%	5%	0%	0%	0%	5%
Religion	5%	90%	5%	0%	0%	0%	0%
National Origin	5%	90%	0%	0%	5%	0%	0%
Having Minor Children	9%	77%	0%	9%	0%	5%	0%
Being a Student	4%	55%	4%	14%	0%	9%	14%
Having Pets	4%	23%	9%	14%	14%	9%	27%
A Disability	14%	76%	0%	5%	5%	0%	0%
Income	5%	31%	9%	5%	18%	18%	14%

STUDENTS (If you are not a student, please skip to question 33)

29. Do you live on campus? 31 responses	Yes 48%	No 52%					
30. Where do you live on campus? 16 responses	Dormitory or Residence Hall 50%		Sorority or Fraternity 31%		Other: 19%		
31. What factors affected your choice of on-campus housing? 16 responses	Price/Rent 50%		Proximity to campus resources 31%		Community 0%		Other: 19%

GENERAL QUESTIONS

32. How did you find your current housing unit? 127 responses	Realtor 22%	Newspaper ad OR flyer 10%	University Housing office 9%	Vandal Trading Post 5%	Online (non-university) 30%	Other: 24%
33. Please select what factors influence your choice of housing? (mark all that apply) 151 responses						
Price	89%	Provision for children or dependents				16%
Size of housing unit	70%	Availability of transportation				10%
Condition of Property	68%					
Proximity to work, daycare, or school	62%					
Safety of neighborhood	52%					

Accessibility	40%					
Pet-friendly	38%					
Family-friendly community	34%					
Proximity to parks	22%					
Proximity to nightlife	16%					
34. Do you feel you could/would move to any other part of the city if the housing were available and affordable for you? 151 responses	Yes 62% No 38%					
35. If you selected NO to the previous question, please select what factors influence your decision to NOT move to any other part of the city if housing was available and affordable to you. 56 responses						
Proximity to work, daycare, or school	61%		Proximity to nightlife		23%	
Condition of property	41%		Pet-friendly		23%	
Safety of neighborhood	41%		Proximity to parks		23%	
Price	39%		Family-friendly community		21%	
Size of housing unit	38%		Other		20%	
Accessibility	23%		Availability of transportation		7%	
			Provision for children or dependents		4%	
36. Do you have access to public transit? 136 responses	Yes 74%		No 26%			
37. Which form of transportation do you use most often? 145 responses	Walk 33%	Bicycle 10%	Car (owned) 53%	Car (shared) 2%	Public Transit 1%	Other: 1%
38. Do you think housing discrimination is an issue in Moscow, Idaho? 147 responses	Yes 21%	No 78%	Not Sure: 1%			
39. Are you aware of any zoning or land-use laws that create barriers to fair housing or encourage housing segregation? 151 responses	Yes 6%	No 94%	See Table 3 on page 8 for explanations of respondents who said ‘yes’ to question 39.			
40. Do you feel you have been discriminated against because of belonging to any of the following groups? (leave blank if not) 8 responses	Minority Households 25%		Female-headed households 25%		Elderly households 0%	Other: 50%
41. Do you feel lenders target any of the following groups? (leave blank if not) 15 responses	Minority households 67%		Female-headed households 13%		Elderly households 7%	Other: 13%

42. Do you think any of the following are barriers to fair housing in Moscow, Idaho? (mark all that apply) 70 responses		
	Yes	No
Income levels of minority and female-headed households	67%	33%
Sellers of homes refusing to show their homes to certain buyers	24%	76%
Poor credit histories	73%	27%
Concentrations of affordable housing in certain areas	69%	31%
Housing providers placing certain tenants in the least desirable units	38%	62%
Housing providers using discriminatory advertising (i.e. advertising for married couples only, or females only)	37%	63%
Lack of knowledge among landlords, real estate agents, bankers/lenders, and/or residents regarding fair housing	50%	50%
Other:		

Please let us know what improvements you would recommend to Moscow's housing market to increase its fairness. Thank you for your time in completing this survey.

1. Make landlords clean up properties. Have minimum safety/health and living standards - otherwise the government should stay out of it. Put rent control on student housing.
2. Moscow has some "slum lords" that allow too many tenants in one rental. The upkeep and attention to zoning restrictions is often very poor but renters, mostly students, pay rents that are quite high. This is awful for the renters and for permanent residents. Owners or rental businesses who let renters live in such units do not maintain yards well, have mud for driveways, and never limit parking to the number of vehicles supposedly allowed. I live in a mixed neighborhood of rentals and owner-occupied houses and it's nice except the appearances of the outside of rentals due to absentee or disinterested landlords.
3. Have laws that require people to keep trash and junk off their property so the rest of us don't have to look at it. Too many junky, dirty, run-down properties, very difficult to find anything decent to rent or lease for adults. It is all college trash!
4. I have no personal knowledge of unfairness in housing issues in Moscow but feel it probably happens.
5. More subsidized senior housing.
6. Cost of housing was biggest factor in finding an affordable home for a single individual (1 income). Not enough inventory.
7. Cost of housing vs. average wage.
8. Asking questions about one's own housing situation does not necessarily reflect answers that may cause concern (i.e. if a long-time resident who personally never dealt with an issue). The general questions on the last two pages seem to focus better on the issues.
9. Having owned our house in Moscow 40+ years it's hard to answer these questions. However, at our age now Moscow does not offer enough one level homes in a reasonable price for people who no longer want stairs, etc., but not ready for assisted living.

10. Housing prices in Moscow-Pullman are high-priced compared to many rural areas not only in ID-WA, but other states. Reason: university in each town, results in artificially elevated home prices because at higher wages than the "normal Joe". We experienced this first-hand in the early 90s coming from a rural community in the Great Plains states.
11. Race/ethnicity has never been an issue for me in regards to renting, but the only suggestion I have is the ability to have pets more so.
12. The cost of living (price of houses) seems high in the Moscow/Pullman area. Limited homes to choose from (smaller town) higher prices in Moscow.
13. I've not been subject to discrimination, being a white male with generally all white male friends. I'm interested in minority's opinions on this subject, and I regret I can't be more helpful!
14. Moscow should seriously reconsider its noise complaint system. As a graduate student in music, I need to practice drums. But I am unable to as anyone who simply doesn't like the sound can stop me. I have padded my walls and done everything I can to keep the noise down, but the fact remains: the law is based on subjective opinion. If someone doesn't like the sound, no matter its volume, I am not allowed to play as the police can stop me. It leaves a fair-minded and sound-conscious musician absolutely no recourse. The law should be based on an agreeable decibel level.
15. Moscow is over-priced! We can buy a house for \$100,000 less in Boise/Nampa, Idaho for the same size and quality as we have found here. Our options are limited as we don't want to pay an outrageous mortgage. Rent is also high and geared toward student not families that work.
16. Six to eight college students living in a house screaming and hollering all night in a family neighborhood is a problem. If complaints are made, it is the college students who come out ahead as they continue their behavior without any consequences.
17. Lived in Moscow 50+ years, great place to live, don't make it a less desirable community by making it governed by society.
18. Open market exchange, clear contracts, limits to ensure honest advertising.
19. I would recommend Moscow improve its downtown housing options. This includes the area near the old silos to include more apartment style housing such as in the old Moscow Hotel. This would encourage walking traffic from downtown to campus, reduce driving, expand downtown, and provide housing and other space for restaurants and stores. It would also be helpful if Moscow enforced anti-discrimination ordinances.
20. Less property management power/ownership of total property allowed.
21. Allow new houses to be built in the city without as many regulations and inspections as currently required by the city of Moscow. Equality of race, religion, sex, ethnic background, the color of juice you drink, the amount of hair on your balls is not the reason for housing issues in the great City of Moscow. Allow growth to occur and stop holding down the middle class.
22. Get rid of banks.
23. Cheaper.
24. Encourage honesty in realty services.
25. Allowing responsible undergrads to rent in "nicer" or "family" housing areas. Not all undergrads party 24-7!
26. This is quite the loaded question. Abolishing housing as a market commodity would probably be a pretty good place to start if someone was actually serious about making housing accessible (fair) to all people regardless of class, race, sex, sexual identity, disability, etc.
27. Investigate University City rentals.
28. Not make certain places so much more expensive than other places. And don't give foreign exchange students more privileges on better housing.
29. To make non-apartment housing for small families or mature students more affordable for what they are getting. For example, not having to pay \$825 a month for rent when the property is less than desirable and rundown but have limited options to choose from. Also be less discriminatory with those that own pets. I am a very responsible pet owner but when I moved to Moscow I had a very limited amount of rental properties that were pet friendly.

Table 1. Former household locations of homeowners who indicated their former house was not in Moscow.

Pullman, WA	Kendrick, ID
Culdesac, ID	Moses Lake, WA
Oregon	Ypsilanti, MI
Latah County	Boise, ID
Washington	Nampa, ID
Brookings, SD	Minnesota
Utah	Boise, ID
Maryland	Boise, ID
Virginia	Hartington, NE
Spokane, WA	Viola, ID
Twin Falls, ID	Genesee, ID

Table 2. Former household locations of renters who indicated their former rental was not in Moscow.

Rexburg, ID	Charleston, SC
Pullman, WA	Reno, NV
Rexburg, ID	New Mexico
Troy, ID	San Diego, CA
Coeur d'Alene, ID	Coeur d'Alene, ID
Boise, ID	Annapolis, MD
Southern Idaho	Boise, ID
Grand Rapids, MI	Pullman, WA

Table 3. Explanations from those who responded 'yes' to question 39, "Are you aware of any zoning or land-use laws that create barriers to fair housing or encourage housing segregation?"

Rental units overcrowded, limited parking
New and existing structures with no mandatory sidewalks
No, but I think there IS discrimination
Floodplain
The laws concerning noise favor those who don't play an instrument. As the "Heart of the Arts", Moscow does a terrible job giving musicians who try to contain their sound a fair law. It enrages me.
I am very tired of A4 housing in family (house) neighborhoods.
I am unaware of any housing segregation, though I believe it is potentially present.
Haven't heard anything
If there are any, I'm not aware of them.
Capitalism
I know what redlining is, but that doesn't happen in Moscow.

City of Moscow Analysis of Impediments Action Item Report and Addendum - May 31, 2019

ACTION ITEM NO. 1: City Comprehensive Plan

The City of Moscow's Comprehensive Plan adequately addresses the need for varying types of housing within the City and also provides an array of opportunities and ideas for advancing affordable housing within the community, some of which have been completed since the adoption of the 2009 Plan. However, there are several suggestions and actions outlined within the Plan that have not been implemented that could provide tremendous benefit to the City of Moscow in terms of providing and maintaining affordable housing. Action to be taken in response to this impediment includes research and development of appropriate programs and partnership opportunities that will assist in the provision and maintenance of affordable housing, as suggested in the Comprehensive Plan. Programs may include enforcement policies to ensure resale of affordable housing properties below market rates, funding programs for construction and rehabilitation of affordable units, or third party arrangements including deed restrictions and creation of land trusts that reduce the purchase price of home ownership. Research conducted should include examination of such programs within other municipalities and should advise on the potential level of success for such incentives in Moscow.

Action Item Status Update: *The City of Moscow has jointly funded a regional housing study being completed by Thomas P. Miller and Associates which will analyze the local housing market and provide recommendations regarding affordable housing programs and policies the City might consider. The housing study is anticipated to be completed in the summer of 2019 after which the Fair and Affordable Housing Commission will review the report and provide a recommendation to the City Council. The Fair and Affordable Housing Commission also developed a City Resolution entitled Principles for Affordable Housing, articulating the City's support for affordable housing development within the community. The Principles for Affordable Housing Resolution was adopted by the City Council as Resolution 2018-06 on April 16, 2018.*

ACTION ITEM NO. 2: City Zoning Code

The nonconforming structure provision within the Zoning Code may limit the ability for potential buyers to obtain a loan on a property due to a nonconforming status of the structure, and can be an impediment to affordable housing in the community. Action to be taken in response to this impediment includes amending the nonconforming section of the Zoning Code to allow for the reconstruction of a nonconforming structure, as it existed prior to destruction.

Action Item Status Update: *On November 21, 2016, the City Council adopted Ordinance 2016-15 amending the nonconforming structure provisions of the Zoning Code allowing the reconstruction of nonconforming structures should they be unintentionally destroyed by fire or other means. This Action Item has been completed.*

ACTION ITEM NO. 3: City Zoning Code

The definition of “Day Care Facility” within the Zoning Code specifically includes foster homes, thereby subjecting foster homes to zoning and location limitations. Such limitation may violate the Fair Housing Act should it be enforced to prevent the location of a foster home outside of specific portions of the city. Action to be taken in response to this impediment includes amending the Zoning Code so that the definition of “Day Care Facility” no longer includes foster homes.

Action Item Status Update: *To address this issue, the Planning and Zoning Commission is currently preparing a Zoning Code Amendment that will amend the definition of a child care facility to exclude group and foster homes. It is anticipated this code amendment will be completed in the Fall of 2019.*

ACTION ITEM NO. 4: Tax Policy

Tax policies have the potential to reduce the development cost of accessible and affordable housing in Moscow. Action to be taken in response to this impediment includes increasing awareness of State of Idaho affordable housing tax credit programs that are available by creating educational materials and distributing them accordingly.

Action Item Status Update: *The City Community Development Department continues to seek potential affordable tax credit housing developers and direct them to the Idaho Housing and Finance Association for additional information. This Action Item is on-going.*

ACTION ITEM NO. 5: Survey

A survey of professionals in the private sector (architects, engineers, contractors, realtors, lenders, property managers, etc.) has not been conducted since 2001. A survey of these professionals informs whether or not additional or different fair housing related training is necessary for the community of Moscow to ensure these professionals have the knowledge to provide services in accordance with the Fair Housing Act, and the Fair Housing Design Manual. Action to be taken includes conducting a survey of the private sector, similar to the survey completed in 2001 in order to be aware of training needs in our community and areas where the Commission can assist in providing better information dissemination.

Action Item Status Update: *The City Community Development Department will conduct a training seminar survey in conjunction with the fall 2019 fair housing training event to assess the effectiveness of the annual fair housing training. This Action Item is ongoing.*

ACTION ITEM NO. 6: Training

To raise awareness and increase education about fair housing practices and to ensure the City of Moscow is providing housing services to the community in accordance with the Fair Housing Act, it is

essential for training opportunities to be made available on an annual or biennial basis. Action to be taken includes the promotion of educational opportunities for housing providers, lenders, realtors, fair housing advocates, and the general public, including the continuation of annual or biennial training sessions in cooperation with the Intermountain Fair Housing Council and Idaho Housing and Urban Development, as well as tenant/landlord informational sessions including information on fair housing practices.

Action Item Status Update: *The City of Moscow continues to affirmatively promote fair housing practices through the annual fair housing proclamation, Farmer's Market tabling, annual fair housing training events and a biennial housing fair event. This Action Item is ongoing.*