



CITY OF IOWA CITY
UNESCO CITY OF LITERATURE

FAIR HOUSING CHOICE STUDY

2019 Analysis of Impediments to Fair Housing Choice



EQUAL HOUSING
OPPORTUNITY

Neighborhood & Development Services

410 E. Washington Street, Iowa City, IA 52240

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Chapter 1: Introduction and Executive Summary

The principles embodied in “fair housing” are fundamental to healthy communities. Codified in the Fair Housing Act, they ensure that persons are not denied equal opportunities to housing because of any protected characteristic, and in the process, address historic patterns of segregation and the denial of access to opportunity. The City of Iowa City strives to affirmatively further fair housing by regularly identifying fair housing issues, developing concrete plans, and implementing policies to create positive change.

The U.S. Department of Housing and Urban Development (HUD) defines affirmatively furthering fair housing as taking meaningful actions to overcome historic patterns of segregation, promoting fair housing choice, and fostering inclusive communities free from discrimination. Specifically, this includes actions that together address disparities in housing need and access to opportunity, replace segregated living patterns with integrated and balanced living patterns, transform racially and ethnically concentrated areas of poverty into areas of opportunity, and maintain compliance with civil rights and fair housing laws. The City’s duty to affirmatively further fair housing extends beyond federal programs, like the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Programs, to all activities and programs relating to housing and urban development.

Federally, impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choices, in the public and private sectors. Iowa City also extends protections to include age, creed, gender identity, marital status, sexual orientation, presence or absence of dependents or public assistance source of income, including rental subsidies. Impediments may include:

- Violations and potential violations of the Fair Housing Act.
- Actions counterproductive to fair housing choice such as NIMBY (Not In My Back Yard) attitudes/community resistance to: people of color, persons with disabilities, and/ or low-income persons moving into White and/or moderate- to high-income areas; or to the siting of housing facilities for people with disabilities in residential neighborhoods due to its future occupants.
- Actions or omissions that in effect restrict housing opportunities for a protected class.

Impediments also include policies, practices, or procedures that are neutral on their face, but indirectly or unintentionally limit housing choices for protected classes.

Fair housing planning is the first step in the City’s ongoing process to affirmatively further fair housing. As directed by HUD, the City regularly conducts Analysis of Impediments (AI) to Fair Housing Choice, i.e. this Fair Housing Choice Study, to assess issues. After developing its plan, the City incorporates and implements it through subsequent efforts that connect housing and community development policy and investment with meaningful actions. The City’s approach to fair housing planning utilizes data to assess issues and contributing factors and sets priorities and goals to overcome them, ultimately leading to meaningful action. Public input is essential to the City’s process to craft goals, strategies, and actions. This is because fair housing planning must tackle tough issues to be effective, so the whole community must have an opportunity to participate in the discussion and make decisions.

Methodology

The scope of this fair housing study is broad and covers a wide array of topics affecting housing choice. This includes a comprehensive review of impediments to fair housing choice encompassing private and public sector housing within the City, not just housing assisted by Federal, State, or local government programs. Specifically, the Study:

- Evaluates the availability of affordable, accessible housing in a range of unit sizes;
- Reviews the City's laws, regulations, and administrative policies, procedures, and practices;
- Analyzes public and private factors that affect fair housing choice for all protected classes; and Assesses how the City's practices affect the location, availability, and accessibility of housing.

As such, this document serves as the substantive, logical basis for fair housing planning in the City. It also provides essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates and helps build public support for fair housing efforts both within the City's boundaries and beyond.

Overview

Overall, the City utilized a comprehensive approach to complete the analysis, including both quantitative and qualitative analysis. The following are the primary sources used for analysis:

- The most recently available data regarding population, households, housing, income, and employment at the census tract, municipal, and larger levels of analysis (including Census, American Community Survey (ACS), Bureau of Economic Analysis (BEA), Bureau of Labor Statistics (BLS), and Comprehensive Housing Affordability Strategy (CHAS);
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database;
- Local knowledge and local data including parcel, zoning, human rights, housing inspection, real estate and administrative information;
- Public and administrative policies affecting the siting and development of housing and community development efforts (including private, local, state, and federal sources)
- Feedback from agencies that provide housing and related services to members of the protected classes;
- Input from other targeted stakeholders and civic leaders, including the University of Iowa; and Information from the general public.

Quantitative data helped identify and analyze trends, including those related to demographic, income, employment, and housing. Special attention was given to data associated with protected classes within the City. Quantitative information from HMDA and public agencies, including the City, provided additional information to help assess existing barriers to fair housing choice.

Qualitative data supplemented quantitative data by identifying barriers to fair housing choice in which data are not collected and by identifying causes and meaning. Meetings, interviews, surveys and discussions with the general public, targeted stakeholders, civic leaders, and others were especially important. In addition, first-hand accounts helped illustrate how barriers affect lives.

Funding

This plan was funded by Community Development Block Grant program (CDBG) and HOME Investment Partnership (HOME) administrative and planning dollars. Assistance in reviewing the document was provided by the City's volunteer's commissions and other agencies focusing on fair housing issues. Numerous other individuals also gave their time through meetings, interviews, surveys, and open-ended discussions. Maximizing available resources helped obtain a wide range of information on fair housing problems to develop a realistic, comprehensive set of actions.

Project Team

City of Iowa City staff from the Neighborhood and Development Services Department (NDS) and the Office of Equity and Human Rights (EHR) conducted this fair housing study to identify and analyze impediments to fair housing choice.

NDS works to find solutions that promote healthy neighborhoods and a vibrant business community. This includes assistance from the following divisions:

- **Neighborhood Services** administers various housing and community development services, including the Community Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs, rehabilitation programs, housing inspection services, neighborhood association outreach services, and Iowa City's public art program.
- **Iowa City Housing Authority (ICHA)**, part of Neighborhood Services, assists more than 1,200 low-income families to acquire and maintain affordable housing through rental and homeownership programs including the Housing Choice Voucher (HCV), Veterans' Supportive Housing (VASH), and Public Housing Programs.
- **Development Services** provides the public planning and building inspection services. This includes coordinating long-range planning efforts, reviewing development proposals, conducting related building inspection services, and coordinating historic preservation efforts.
- **Metropolitan Planning Organization of Johnson County (MPOJC)** provides transportation planning services and assists with transportation-related questions and needs as the Metropolitan Planning Organization for the Iowa City Urbanized Area.

EHR oversees the Iowa City Human Rights Ordinance, fields discrimination complaints, and works closely with the Human Rights Commission. In addition, EHR is responsible for the following tasks related to human rights and equity:

- Receive, investigate and make decisions on complaints alleging unlawful discrimination, enforce anti-discrimination laws, provide trainings and materials to educate the community on civil and human rights, and collaborate with community groups in the planning and coordinating of events.
- Coordinate with City departments to assist in efforts to eliminate racial inequities in City programs and services with the end purpose of improving outcomes for all, report on racial equity and social justice, and manage the social justice and racial equity grant.

Their considerable role in fair housing is covered in later sections in greater detail.

Extensive advice was also sought from members of NDS and EHR. The executive committee most involved in the creation of the study included:

- Tracy Hightshoe, Department of Neighborhood and Development Services Director
- Stefanie Bowers, Human Rights Coordinator & Equity Director
- Erika Kubly, Neighborhood Services Coordinator
- Steven Rackis, Iowa City Housing Authority Administrator
- Kristin Watson, Equity and Human Rights Investigator
- Kirk Lehmann, Community Development Planner

Boards and Commissions also played an important role. The Housing and Community Development and Human Rights Commissions (HCDC and HRC respectively) helped guide the document and provided valuable feedback.

Public Participation

Fair housing planning affects the whole community, so all people in the community must have the opportunity to be at the table and participate in making those decisions. The City also recognizes that those most familiar with fair housing issues are the people who have experienced these issues.

For this reason, the City made community participation an important part of the planning process to help ensure the integrity and success of the City's efforts to affirmatively further fair housing. In addition, the City's public participation process helped create effective, ongoing relationships with the community that provided for a clear and continuous exchange of concerns, ideas, analysis, and evaluation of results.

In total, staff have had more than 330 contacts with the public through meetings, interviews, and surveys. This section details that process and summarizes feedback from those events.

Focus Groups and Stakeholder Interviews:

Targeted feedback from stakeholder and focus group interviews provided detailed knowledge about specific fair housing issues within the community and helped identify possible solutions to overcome those issues. Feedback included representatives of agencies and organizations involved in the provision of public services and amenities, private and public sector housing, and human rights in Iowa City. In total, some 83 individuals attended 6 different focus groups. These included:

Johnson County Local Homeless Coordinating Board (LHCB). On September 12, 2018, staff met with 22 members of the LHCB, a collaboration of 20 different local nonprofits, government agencies, and communities of faith with an interest in ending homelessness and improving the lives of those experiencing homelessness. Often cited challenges for renters included rental deposits and application fees; landlord requirements for credit, references, criminal histories, online applications, or bank withdrawals for rent; and discrimination based on appearance, especially for those experiencing homelessness. They also noted a need for the City to better allocate funds in alignment with the City Council's adopted Strategic Plan and CITY STEPS goals, especially where citizen commissions can affect decision-making. They noted more local dollars should be invested towards the Strategic Plan's priorities, the City needs to plan more regionally and more long term, and that renters should have additional protections from retaliation when reporting landlords and property managers.

Iowa City Area Association of REALTORS® (ICAAR). On October 3, 2018, staff met with five participants from ICAAR's fair housing committee which included a lender representative. Attendees noted several main concerns regarding barriers to fair housing in Iowa City, such as how the clustering of affordable housing in certain areas has created a stigma which may disadvantage those who live there, and how informal steering of new residents by coworkers/residents occurs. Attendees encouraged City staff to continue investing in disadvantaged parts of the city to overcome concentrations of poverty and agreed that education is one of the most useful ways of working towards improving fair housing in Iowa City. Education on home maintenance as a renter or homeowner was mentioned specifically, which could be especially beneficial for foreign and refugee families in Iowa City who are not as familiar with the area.

University of Iowa (UI). On October 18, 2018, staff met with eight participants from UI to discuss concerns of students, faculty, and staff. Attendees noted a pattern of informal steering by realtors, staff, and department heads for people, especially families, recruited to Iowa City. This affects recruitment and retention of diverse students and staff. Concerns for those with limited physical mobility was also discussed as it can be a challenge to find attractive, available, and appropriate housing with adequate transportation to work. The lack of available public transit in more affordable/accessible areas is a barrier too, as is housing affordability for families who want to live in certain areas or near jobs downtown. Low wages exacerbate the issue. Finally, landlords pressure

tenants to sign leases far in advance and they often don't maintain their units, which disadvantages first-generation students or those who don't have funds for large deposits. Due to the cost of housing in Iowa City, many newcomers live outside Iowa City and commute in, resulting in transportation costs that are a financial burden. To address issues, attendees suggested increasing the availability and reliability of public transportation, providing more education on fair housing, providing tenant and owner education on leasing and renting, investing in neighborhood associations, and enforcing property standards in all rental properties.

Greater Iowa City Apartment Association (GICAA). On October 23, 2018, staff met with 23 participants from the GICAA. Attendees provided feedback on public and private sector barriers to fair housing in Iowa City. Barriers mentioned include a lack of inter-jurisdictional collaboration, increasing costs and inspections for rental permit fees and requirements, the impacts of school districts and elementary attendance areas on the market, a lack of education on fair housing and unit maintenance for small owners and tenants, lack of deposits, and a lack of ADA accessible units and affordable units for families in the expensive market. To overcome these barriers, GICAA suggested collaborating more with landlords, improving fair housing education, working better across jurisdictions and programs, streamlining public processes, and using public funding for programs to effectively accomplish goals.

Greater Iowa City Home Builders Association. On October 24, 2018, staff met with nine participants from the Greater Iowa City Homebuilders Association. Input included that there are too many regulations which add cost and complexity such as architectural design review and upfront development investments required at early stages of the zoning/development process, Iowa City is an expensive market to build in, decision-makers need to better understand the cost and timing of development, old housing stock makes accessibility challenging, many oppose new, often denser, development in Iowa City, and there is a general lack of education regarding maintaining properties for both tenants and homeowners. To overcome these barriers, builders suggest streamlining the approval, permitting, and review process, allowing greater development by-right, improving collaboration with developers and the school district, and better clarifying new housing code and affordable housing rules.

Affordable Housing Coalition (AHC) - On October 26, 2018, staff met with 16 members of the AHC, a grassroots group striving to increase access to affordable housing for households with lower incomes in Johnson County. Attendees found current zoning codes and lending policies to be barriers. They cited income requirements for loans, heavy use of credit ratings, the difficulty of working across jurisdictions, high fees for builders, and policies restricting housing density as barriers to fair housing. Attendees noted that both informal and formal steering are issues, specifically away from South Iowa City. Attendees also noted bias against Housing Choice Voucher (Section 8) tenants in Iowa City, despite them being a protected class. They noted that those who use vouchers are still often turned away by landlords. They also discussed the need for affordable housing for students. Many federal programs have eligibility restrictions on full time students, which is exacerbated by a lack of state funding for higher education, the recruitment of international students, and the construction of new dorms which has driven up prices. The Coalition suggested making zoning/building codes less restrictive towards density, increasing affordable housing incentives and partnerships with developers, securing designated funding sources for affordable housing; raising the minimum wage; and actively testing for housing discrimination.

Following the drafting of the study, targeted groups were invited to comment on the plan, including:

- **Advocacy Groups** that have among their concerns the needs of segments of the population, such as people with disabilities; families with children; immigrants and homeless persons; and specific racial or ethnic groups;
- **Housing Providers**, in particular those who are aware of, and can speak to, the problems of providing moderate- and low-cost housing in the community; and landlords and owners;

- **Educational Institutions**, including the administrators and teachers/professors who can assist in conducting studies and developing formal and informal educational activities for delivery;
- **Financial Institutions** that can provide loans and other financial support to improve homes or areas of the community where living conditions have deteriorated;
- **Fair Housing Organizations** including commissions and voluntary, nonprofit organizations focusing on fair housing problems;
- **Other Governments** in the metropolitan area or region; and
- **Other Organizations** and individuals such as neighborhood organizations that provided ideas, information, or support in identifying impediments to fair housing choice at the neighborhood level and in developing and implementing actions to address these problems

Fair Housing Survey

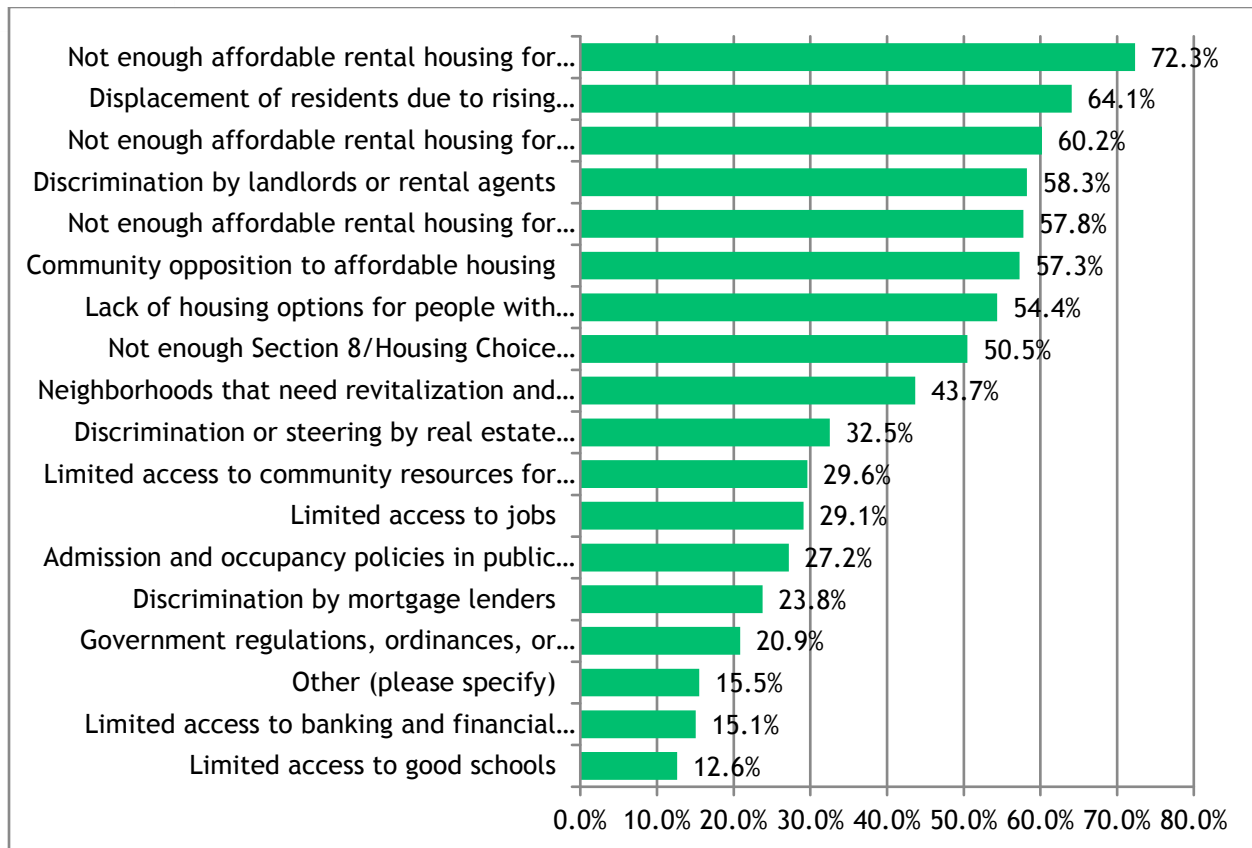
To gain broad public feedback from renters, owners, and buyers, the Office of Equity and Human Rights conducted a Fair Housing Survey more than 3 months at the end of 2018. Copies were available online or in hard copy (either mailed in self-addressed, pre-stamped envelopes or at the public library) depending on preference. The survey was available in English, Spanish, Chinese, and African French. A copy of the survey is available in the appendix.

The survey was advertised through multiple avenues including the City's primary channels, affordable housing service providers, advocate groups, public service providers, the Housing Authority, and other social and community groups. The survey remained open for approximately 4 months. In total, 234 individuals responded. Notable findings included:

- **Lack of understanding/reporting.** Only 43% of respondents felt they understood their fair housing rights and 37% said they knew where to file a housing discrimination complaint. This is problematic because 26% felt they believed they experienced discrimination since living in the area, but of those only 3% filed a complaint. Most respondents (69%) said they didn't know what good filing a complaint would do, 31% stated they didn't know it was a violation of the law, 24% didn't know where to file, and 18% were afraid of retaliation.
- **Discrimination Occurs.** Out of 63 respondents who experienced discrimination, 47 stated it was by a property manager or landlord. The most commonly cited protected characteristic for discrimination was public assistance as a source of income (46%), followed by age (28%), disability (23%), race (20%), and familial status (18%).
- **Barriers to Fair Housing Choice.** Barriers identified by respondents are identified on the following page. Lack of affordable housing was the most cited barrier, primarily for individuals, though also for large families, small families, and persons with disabilities. More than half also noted that displacement due to rising housing costs, discrimination, community opposition to affordable housing, and too few housing choice vouchers were barriers to fair housing choice.
- **Public Barriers.** Respondents were also asked to specifically identify public barriers to fair housing choice (see the next page). No response got more than half, but city funding practices was most cited, followed by zoning then housing codes.

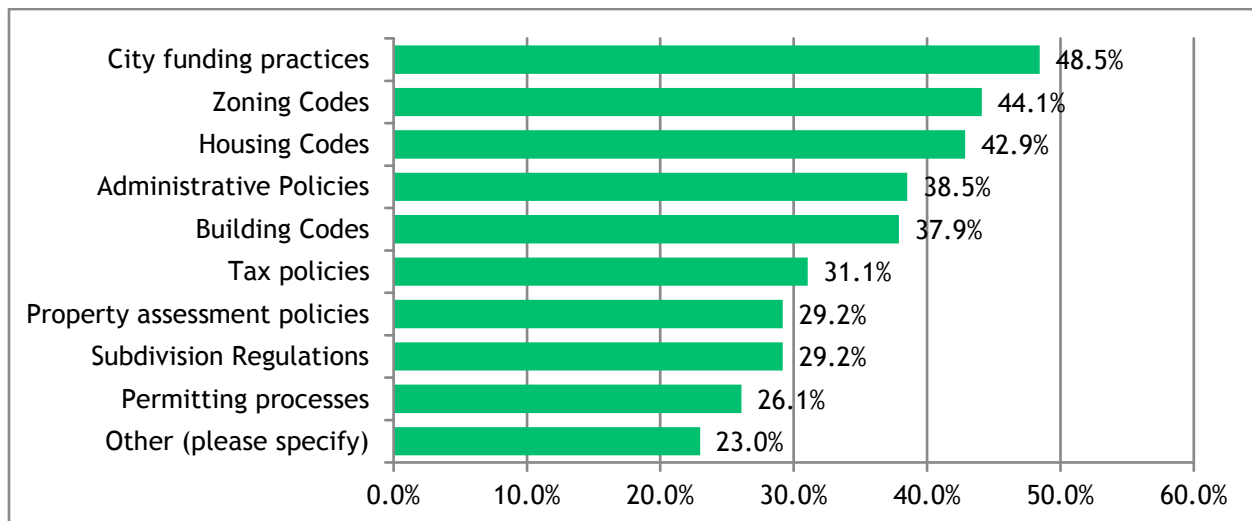
Generally, the survey had good representation of protected classes, though it skewed towards higher incomes. Other results from the survey are included in relevant sections of this document. Full responses to the survey and specific demographic breakdowns can be found in the appendix.

FIGURE 1: DO YOU THINK THE FOLLOWING ARE BARRIERS TO FAIR HOUSING CHOICE IN IOWA CITY?



Source: 2018 Fair Housing Survey, 206 answered

FIGURE 2: WHAT CITY POLICIES OR PRACTICES MAY ACT AS A BARRIER TO FAIR HOUSING CHOICE?



Source: 2018 Fair Housing Survey, 161 answered

Public Events and Adoption

Communication with the public, including representatives such as City Council and the Housing and Community Development Commission (HCDC), was essential in the creation of the plan. The City went beyond the requirements in its citizen participation plan, including its consultation procedures. Additionally, the City encouraged the participation of diverse groups and populations and took steps to ensure that communications and activities were accessible to persons with disabilities. This feedback was especially instrumental in the initial identification of impediments to fair housing choice, determining possible solutions to those impediments, and improving the quality of the plan.

The following briefly summarizes those public events which includes events in the adoption process.

Public Kick-Off Event. On September 27, 2018, 12 participants met to discuss private- and public-sector barriers to fair housing in Iowa City, their top priorities, and their ideas of how to address fair housing issues. Attendees highlighted the following concerns in their discussions:

- The high cost of living and housing in Johnson County, especially downtown Iowa City, make it challenging for people to afford housing.
- There is a lack of fair, adequate, and accessible housing for people with disabilities. This is particularly a problem in older homes, which are often not accessible.
- There is a lack of available housing in general, due in part to the high occupancy rate of students, especially downtown, and the concentration of rental housing. Additionally, the competition for these units can lead to discrimination.
- There is especially a lack of housing that is affordable for Housing Choice Voucher (HCV) holders as well as discrimination by some landlords against those who hold vouchers. This is attributed in part to the lack of information readily available for landlords and the public about housing vouchers.
- Frequent informal steering contributes to a lack of diversity in race, age, and income in many neighborhoods. However, the lack of data on rental rates and patterns and general lack of resources for investigating and describing disparate impacts exacerbates these issues.
- Urban sprawl leads to poor walkability and the general lack of public transportation, in addition to limited bike infrastructure, makes transportation within Johnson County difficult.
- Overly restrictive zoning codes, specifically for single family homes/single-use zoning, and a low percentage of affordable housing in the overall housing stock prevents diverse housing types/density which act as barriers to fair housing choice.
- There is lack of a sustainable funding streams for the City to use towards incentives for development and/or to supplement income.

Some potential solutions proposed by attendees are:

- Providing educational resources for builders and contractors about Aging in Place.
- Provide grants and/or programs for those with disabilities to remodel, build, and/or rent homes/apartments that are mindful of Aging in Place and Universal Design.
- Improve public transit, walkability, and bike routes.
- Reform the zoning code to encourage inclusionary zoning, the creation of balanced neighborhood, and to make it easier to densify.
- Support a higher minimum wage.
- Continue to support private/public partnerships to further fair and affordable housing.
- Increase the quantity and quality of both public and private housing.
- More strongly enforce rental codes.

Other meetings that led to the adoption of the Fair Housing Choice Study for Iowa City included:

- **HCDC Public Meeting** - March 14, 2019, discussed initial findings
- **Public Comment Period** - June 15, 2019 through July 16, 2019, open draft for public comment
- **HCDC Public Meeting and Adoption** - June 20, 2019, recommended draft plan with changes and allowed opportunity for comment
- **HCDC Public Meeting** - August 15, 2019, discussed final draft plan
- **City Council Public Meeting and Adoption** - August 20, 2019

Overall, the following common themes continued to recur throughout the public input process.

- **Affordability:** Housing in Iowa City is expensive, but incomes are not correspondingly high. In addition, housing is not diverse enough within neighborhoods where there are often large areas homogenous areas of single family or other types of homes. This does not allow an opportunity for many individuals, especially those with particular needs, to choose between neighborhoods. Furthermore, both affordable market rate and affordable assisted housing opportunities are limited, which can especially impact those in protected classes.
- **Housing Stock:** Rentals in disrepair and poor quality and housing accessibility are challenges in older areas of town. The City should strive to develop and encourage a diversity of housing opportunities throughout Iowa City. This would better allow individuals with special needs or preferences to find housing that is suited for them in a variety of areas.
- **Public Policy:** Development codes limit flexibility for providing a variety of housing choices throughout neighborhoods, and they increase costs and burden through processes such as design review. The City should strive to ensure policies and funding allocation processes align with the goals in adopted plans, including the priorities listed in City Steps. The City should also seek to streamline processes without losing their integrity and intent. This includes a need to continue to enforce the maintenance of rental housing and to ensure compliance with fair housing law.
- **Coordination:** A more regional and collaborative approach is needed for the area, including encouraging more cooperation and coordination between jurisdictions and with other actors such as builders, landlords, the UI, and school districts. This would help overcome challenges related to complicated and changing rules and would assist the City and region in implementing a more strategic, long-term approach to addressing fair housing and affordable housing issues.
- **Education:** Tenants, owners, and professionals involved in the housing market all require more education to understand their fair housing rights and responsibilities. As such, the City should prioritize educating the general public on their rights, while also sharing best practices with institutional actors such as landlords to ensure those rights are respected. Tenants and homebuyers should also receive objective information on neighborhoods, including schools and amenities, to allow them to make their own decisions which may help counteract informal steering and reduce NIMBY attitudes.

Executive Summary

Demographic Profile

Iowa City has experienced strong population growth for decades, growing at a rate well above that of Iowa, though lower than the County. In addition to an increasing population, Iowa City is one of the densest urban areas in Iowa. The five Pentacrest tracts are especially dense.

As would be expected due to the university, the city's population is younger with an especially large number of residents aged 18 through 29. Most households are not families, either living alone or with roommates, and a relatively large number live in group quarters such as dorms. Conversely, the City has comparatively fewer families, children, and adults over the age of 35. Historically, the proportion of family households has declined, while single-headed families and nonfamily households have increased. The Pentacrest tracts contain the most nonfamily households and far fewer children and families.

Iowa City is more diverse than Iowa, and it has become more diverse over time. Iowa City contains a larger number of Asians, Black/African Americans, and Hispanic/Latinos. Households of color have generally grown at a faster pace than non-Hispanic white households, with the Hispanic population growing especially quickly. Nonwhite/white segregation is low, but it has been increasing. However, black/white segregation is considered "moderate," the group to reach that threshold. The region tends to be more segregated than the City. Three tracts are considered areas of racial/ethnic concentration:

- **Tract 4:** Concentration of Asian/Pacific Islanders households
- **Tract 18.02:** Concentration of Black/African American households
- **Tract 23:** Concentration of Asian/Pacific Islander households

Areas that have seen the greatest increase in diversity includes tracts 18.02, 21, 23, and 5.

Much of the City's diversity is driven by foreign populations. The foreign born population has recently increased, as has the proportion of naturalized foreign born residents. This makes sense given the university's foreign exchange programs and job opportunities. The five largest foreign born populations comprise nearly half of total foreign born residents, including populations from China, Mexico, Korea, India, and Sudan. Most foreign born populations speak a language other than English at home, and nearly half speak English less than "very well." The highest rates of foreign born population live in on the west and south sides, either because of a desire to co-locate near existing social networks of immigrants or because they have been unable to find housing in other areas of the community.

Iowa City's population has a lower proportion of individuals with disabilities relative to the state, though it has increased over time. Some of this is likely due to the general aging of the population. The presence of disabilities varies by age, with the likelihood of disability increasing throughout life with a sharp increase after 75 years. In all age groups except those 75 years and older, Iowa City has a smaller proportion of persons with disabilities compare to Iowa, likely due to Iowa City's strong health care industry which attracts those with health needs. The most common disabilities are cognitive, independent living, and ambulatory. Native Americans and non-Hispanic whites are most likely to be disabled. Generally, persons with disabilities are well-integrated in the community.

Economic Profile

Iowa City's economy is diversified, robust, and vibrant. Employment is primarily tied to providing services rather than goods. The region's top 20 employers include institutions of higher education, public administration, health services, financial services, and manufacturing. The University of Iowa (UI) and the UI Hospitals and Clinics account for over 27,000 jobs, more than the remaining top employers combined. Education and medical services are especially important. Most recent job growth came from the private sector, though the public sector increased as a proportion of total jobs. This included large job growth in Healthcare/Social Assistance, in addition to Educational Services, Accommodations/Food Services and Professional/Scientific/Technical Services. Industries with job losses included Information, Administrative/Support/Waste, Transportation/Warehousing, and Manufacturing. Overall, these losses were offset by gains in other industries. 10-year projections suggest that employment will increase most in the higher-skill, higher-wage sectors, including those with an already strong presence in Iowa City.

Unemployment peaked at the end of the Great Recession and has fallen almost every year since. The City has consistently lower unemployment rates than the State, even as the labor force has expanded to accommodate the growing economy. Male unemployment is marginally higher than for females, and Asian/ Pacific Islanders, Other Races, and multi-racial workers tend to have lower unemployment rates, as do white workers. Blacks and Hispanics tend to have higher unemployment rates. Persons with disabilities had the highest rate of unemployment in Iowa City.

Non-Hispanic White householders had a median household income (MHI) of \$50,424, while Hispanic householders also had an MHI of \$45,285. Both increased since 2010. The growth in both groups suggests that income growth for non-Hispanic households of other races was weaker overall, though that varies between groups. For racial groups of all ethnicities, householders of another race had an MHI of \$45,933, followed by black householders, Asian householders, and then householders of two or more racial groups. Since 2010, black householders had the largest increase followed by householders of two or more races, and householders of another race. Asian householders were the only group that had a decrease in MHI. The Pentacrest tracts have some of the lowest incomes. Generally, Iowa City has a higher cost of living than Iowa, and it is slightly higher than the national cost of living as well.

More than half of Iowa City residents are Low- and Moderate Income (LMI), which has increased from 2010. The Pentacrest tracts are all primarily LMI except for Manville Heights. This suggests many LMI households in Iowa City are in fact students. Other areas considered LMI include Northside/ Mayflower/ Shimek; Pheasant Ridge; Melrose/ Emerald; College Green; Court Hill/ Lucas; Mark Twain and Riverfront Crossings East; The South District; and around Cole's Mobile Home Park.

Iowa City has more than double the proportion of its population living in poverty compared to the state. However, looking at poverty rates for those not of typical college age (18 to 24 years) reveals an age-adjusted poverty rate that remains higher than the county and state, but within one percentage point. Several tracts in Iowa City have age-adjusted poverty rates greater than the City's rate, including three Pentacrest tracts, and areas to the south and west. With regards to race, black populations have the highest poverty rates in Iowa City, followed by Asian/Pacific Islanders, those of another race, and Hispanics. The highest percentage of nonwhite and Hispanic populations in poverty is primarily in the Pentacrest tracts. Overall, 38% of nonwhite and Hispanic populations in Iowa City lived in poverty compared with 25% of the non-Hispanic white population.

Housing Profile

Iowa City's existing housing stock is shaped by a high demand for housing, especially as it relates to rental units near downtown. Most units in Iowa City are renter-occupied, primarily in the Pentacrest tracts. Meanwhile, the homeownership rate in Iowa City 48%, an increase from 2000, but a decrease from 2010. This rate is lower than the State but is typical for college towns with large student renter populations. As a result, Iowa City has a higher percentage of multi-family housing units, many of which are near the University to accommodate students. The overall vacancy rate was 6.2%, which includes units not for rent or sale. When accounting for available units only residential vacancy rates are significantly lower with a homeowner vacancy rate of 1.4% and a rental vacancy rate of 2.7%.

Iowa City has experienced lots of new development following the Great Recession due to pent up demand for units from slowed construction but a growing economy. Generally, single family and duplex development has remained stable with recent increases being caused by an increase in multi-family projects, often in mixed use buildings. 2016 saw an especially large number of new units, partially due to upzoning with the Riverfront Crossings Form Based Code.

The median value of owner-occupied housing was \$202,200 in 2017, higher than the State's median value. House values steadily increased since 2010 at a rate slightly higher than the increase in median household income. Median housing values ranged from \$128,700 to the South to \$495,800 downtown. Notably, the Pentacrest tracts had some of the largest percent increases in value. Most homeowner households are non-Hispanic white. Homeowners of color increased from 2010 but are still far below their city-wide proportion. Nonwhite and Hispanic populations have homeownership rates between 25-45%, but black and other race households have homeownership rates below 15%. Five tracts had Hispanic or nonwhite owner populations that were larger than the City's overall rate, primarily on the west and south sides, in addition to downtown.

Rents increased significantly since 2010, and at a faster pace than house values. In 2017, median gross rent was \$924 including utility costs, much higher than for the State. Gross rents varied greatly across the City, ranging from \$735 in southwest Iowa City to \$1,347. Generally, areas outside of the Pentacrest tracts saw the highest percent increases in gross rent since 2010. A smaller proportion of renter households are non-Hispanic white households. Households of color occupy the rest, though they have decreased since 2010. Concentrations of black renters existed in south and east Iowa City, while concentrations of Asian/ Pacific Islander renters existed to the west. Overall, five tracts had Hispanic or nonwhite renter populations larger than the City's overall rate, located in west and south Iowa City.

Physically substandard units are a small and decreasing problem. However, high rates of housing cost burden indicate issues of affordability, especially in high-demand areas. Other non-Hispanic households are most likely to be severely cost burdened, as are non-Hispanic white households. Family households are least likely to be severely housing cost burdened, and nonfamily households are more likely to be severely housing cost burdened. In addition, areas with the greatest housing burden are downtown, followed by adjacent areas to the south and the far west side. Areas to the east have the lowest levels of housing problems. This points to students being among the most impacted by the housing issues. Non-Hispanic Native American, other, and black households are most likely to experience housing problems. Similarly, nonfamily households are also more likely to experience housing problems. Households of color are more likely to experience severe housing problems.

Summary

Many characteristics associated with lower income households (such as high poverty, high rates of LMI persons, lower median housing values, lower rents, overcrowded rental units and cost-burdened renter households) are found in the Pentacrest tracts. These conditions are typical in areas surrounding a large university that have a substantial transient student renter population.

When these demographic characteristics are found outside of the Pentacrest tracts, they may indicate potential impediments to fair housing choice if they occur in areas of racial or ethnic concentration. Three tracts, two to the west and one to the south, met the definition of areas of racial/ethnic concentrations. Two of those tracts also had higher rates of families with children, foreign born residents, persons with disabilities, renters of color, and overcrowded rental units. The one to the south also exhibited more LMI persons, female-headed households, overcrowded owner units, and cost-burdened owners. Meanwhile, the other tract stands out as a Pentacrest Tract, only exhibiting higher rates of poverty, older housing units, and cost-burdened owners. Overall, this suggests that the tract in the south district greatest reflects possible barriers to fair housing choice.

Two other tracts east of the river and south of the railroad also had some characteristics present that may indicate potential impediments to fair housing choice. Particularly, the higher rates of families with children, female-headed households, and persons with disabilities are coupled with higher rates LMI persons and overcrowding which may be a result of barriers to fair housing choice.

Fair Housing

Overall, Iowa City has strong fair housing protections in place for residents of Iowa City. Iowa City defines protected classes expansively for housing and has efficient enforcement mechanisms through the Human Rights Commission and Office of Equity and Human Rights. There is also a continuous outreach and education efforts that occurs in the City, though efforts could always be made to improve.

Overall complaints are down from FY12. Housing complaints average approximately 11-12 per year since FY14 with race, disability, and sex being the most cited basis for discrimination. However, about one third of complaints that come into the City are outside of Iowa City's jurisdiction. Another third reach administrative closure or are withdrawn (typically due to agreement or settlement), while the remaining require further investigation. State and Federal bodies, including the Iowa Civil Rights Commission and HUD's Office of Fair Housing and Equal Opportunity have limited data available, but they receive another 13 to 26 housing complaints per year in Johnson County. Disability is the most cited basis of discrimination for both bodies.

Since past plan, the City has attempted to address each of the five findings as laid out in the Fair Housing Profile Chapter. More work may be needed regarding some of these previously identified impediments as discussed in the conclusions and recommendations.

Unfortunately, a lack of filed complaints does not necessarily indicate a lack of a problem. Some persons may not file complaints because they are not aware of how or where to file a complaint. Discriminatory practices can also be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Finally, households may be more interested in achieving their priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. As such, additional information was gleaned from the City's 2018 Fair Housing Survey, conducted as part of this study.

A total of 234 respondents completed the survey to help evaluate fair housing choice in Iowa City by answering questions about their experiences in the housing market. Just over one quarter said they experienced housing discrimination since living in the area. Of those who felt discriminated against, only 3% reported the discrimination. The most common reasons for not reporting were that "I didn't know what good it would do," followed by "I didn't know it was a violation of the law", "I didn't know where to file", and "I was afraid of retaliation". These results mirror past surveys on these topics in that the primary reasons for not filing were helplessness, fear, and a lack of knowledge about how to file a complaint.

These results speak to a need for improving outreach and education levels around the City, including further developing its program to ensure broad knowledge of legal protections for all residents. Education should also address fears of retaliation if people come forward with concerns and showcase how the process has concrete outcomes. The City should also review its Limited English Proficiency (LEP) plan to ensure these populations have equal access to information regarding fair housing.

Impediments and Strategies

Based on this study, three primary barriers to fair housing choice were identified, including a lack of adequate housing choice throughout Iowa City, disparate access to opportunity between neighborhoods, and a lack of awareness about civil and fair housing rights. In addition, several smaller barriers were also identified through this study. All of these, in addition to recommended strategies to address these barriers to fair housing choice, are laid out as follows (more information about each strategy can be found at Chapter 5).

1: Improving Housing Choice

One of the primary barriers identified in this Fair Housing Choice Study is the lack of adequate housing choices throughout neighborhoods in Iowa City. This includes a lack of availability in addition to diversity in price points, housing types, and locations that would facilitate equal access to housing across the City. Ensuring a diversity of affordable housing is available in a range of locations and types promotes fair housing choice, especially areas that promote access to opportunity. Several strategies to assist in addressing this impediment include:

- Strategy 1: Facilitate a Range of Housing Types
- Strategy 2: Lower the Cost of Housing
- Strategy 3: Continue investment in affordable housing
- Strategy 4: Retrofit Housing for Equal Access

2: Facilitating Access to Opportunity

Housing that affords access to opportunities may be cost prohibitive or non-existent for persons in certain protected classes, especially for those with lower incomes. Currently, Iowa City appears to experience disparate access to opportunity, especially when it comes to access to jobs and to affordable childcare. This study proposes a balanced approach to address disparities in access to provide for both strategic investment in areas that lack key opportunity indicators, while opening housing opportunities in areas with existing opportunity through effective mobility options and the preservation and development of a variety of housing in high opportunity areas. Several strategies to assist in addressing this impediment include:

- Strategy 1: Emphasize Variety in Housing in Areas of Opportunity
- Strategy 2: Community Investment
- Strategy 3: Enhance Mobility Linkages Throughout the Community

3: Increasing Education and Outreach

Based on public input, many residents of Iowa City lack of awareness about rights under fair housing and civil rights laws. This suggests lack of knowledge and awareness regarding fair housing rights is a major barrier to fair housing choice. In addition, ensuring access to information about housing programs and neighborhoods generally can also facilitate fair housing goals. Several strategies to assist in addressing this impediment include:

- Strategy 1: Improve Demand-Side Awareness
- Strategy 2: Increase Supply-Side Awareness
- Strategy 3: Increase Regulator Awareness
- Strategy 4: Provide meaningful language access

4: Operational Improvement

Several other barriers to fair housing choice in Iowa City include smaller operational and planning changes that could help affirmatively further fair housing. These include impediments such as administrative processes and regulations which can slow down and/or stop projects that would benefit protected classes, a need for increased regional cooperation for issues that affect housing, a lack of information that could help identify or address other barriers, and a need to improve the transparency of fair housing enforcement. Most of these barriers should be addressed through operational improvements at the City level. However, most would also need cooperation with many actors in order to truly be effective. Strategies to assist in addressing these impediments include:

- Strategy 1: Improve Fair Housing Enforcement and Transparency
- Strategy 2: Review implementing procedures and regulations
- Strategy 3: Improve regional cooperation
- Strategy 4: Improve Data Collection

Chapter 2: Iowa City Profile

Iowa City is located in southeast Iowa along the Iowa River, best known as home of the University of Iowa and its nationally ranked hospitals and clinics. It is the fifth largest city in the state and serves as the seat of Johnson County. While the City has a variety of land uses, including residential, commercial, industrial, public, and semi-public uses, much the activity in the community is in and around the central business district which neighbors the university. Much of the land in the City is developed, forcing newer subdivisions past its borders into adjoining municipalities or undeveloped Johnson County. Interstates 80 and 380 provide primary car and truck access, and the Iowa Interstate Railroad and Cedar Rapids and Iowa City Railway provide rail access. Passenger flight service is offered at the Eastern Iowa Regional airport in Cedar Rapids (20 miles northwest) and the Quad Cities Regional Municipal airport (55 miles east).

The City's primary economic driver is the University of Iowa (UI). Founded in 1847, it is Iowa's oldest institution of higher education. With more than 33,000 students and nearly 25,000 staff, UI is a major employer and produces a high caliber workforce for the city and state. The University of Iowa Hospitals and Clinics (UIHC) also provides medical and surgical facilities while acting as a teaching hospital. Iowa City is also home to the renowned Iowa Writers' Workshop. The City's literary achievements led the United Nations to name Iowa City one of seven UNESCO Cities of Literature world-wide.

The city leverages this skilled workforce to fuel a healthy and diverse economy. Many jobs are in the service sector (primarily education and health care), though the city also has a manufacturing base. The city has many amenities and services often found only in larger cities, which in conjunction with its excellent public school system and low levels of crime, have landed the city on several national best places to live lists, from Livability.com to the American Institute for Economic Research.

Iowa City's positive attributes attract a diverse population. It is one of the fastest growing areas in the state, and as a result has a strong real estate and rental market. The demand for housing near employment centers and downtown, as well as an abundant student population, have made housing affordability a continuous issue. As a result, the City has engaged in development and housing planning for decades. This has included the longstanding use of CDBG and HOME entitlement funds to improve the lives of numerous citizens.

This chapter explores demographic, socio-economic, and housing characteristics in Iowa City that serve as the basis for identifying impediments to fair housing choice and making conclusions. In other words, it helps identify potential barriers to fair housing choice and to determine what needs may exist. Johnson County, Iowa, and the State of Iowa are used as points of comparison throughout this analysis.

Demographic Profile

This section details demographic information for Iowa City, including specific highlights of members of protected classes to define the issues they face related to fair housing choice. The primary source of data is the U.S. Census Bureau. Most data are at the census tract level, primarily from the 2017 5-Year American Community Survey (ACS) estimates. Occasionally, Decennial Census data from 1990, 2000, and 2010 is also referenced which provides full counts and can be available at finer geographic levels.

This section often references Census geographies. These include Census blocks (the smallest unit of publicly available data), block groups (comprised of several blocks), and tracts (comprised of a few block groups and visible in the map below). Iowa City includes 17 Census tracts and 39 Census block groups. Several tracts are not located entirely within City limits, as noted on individual tables.

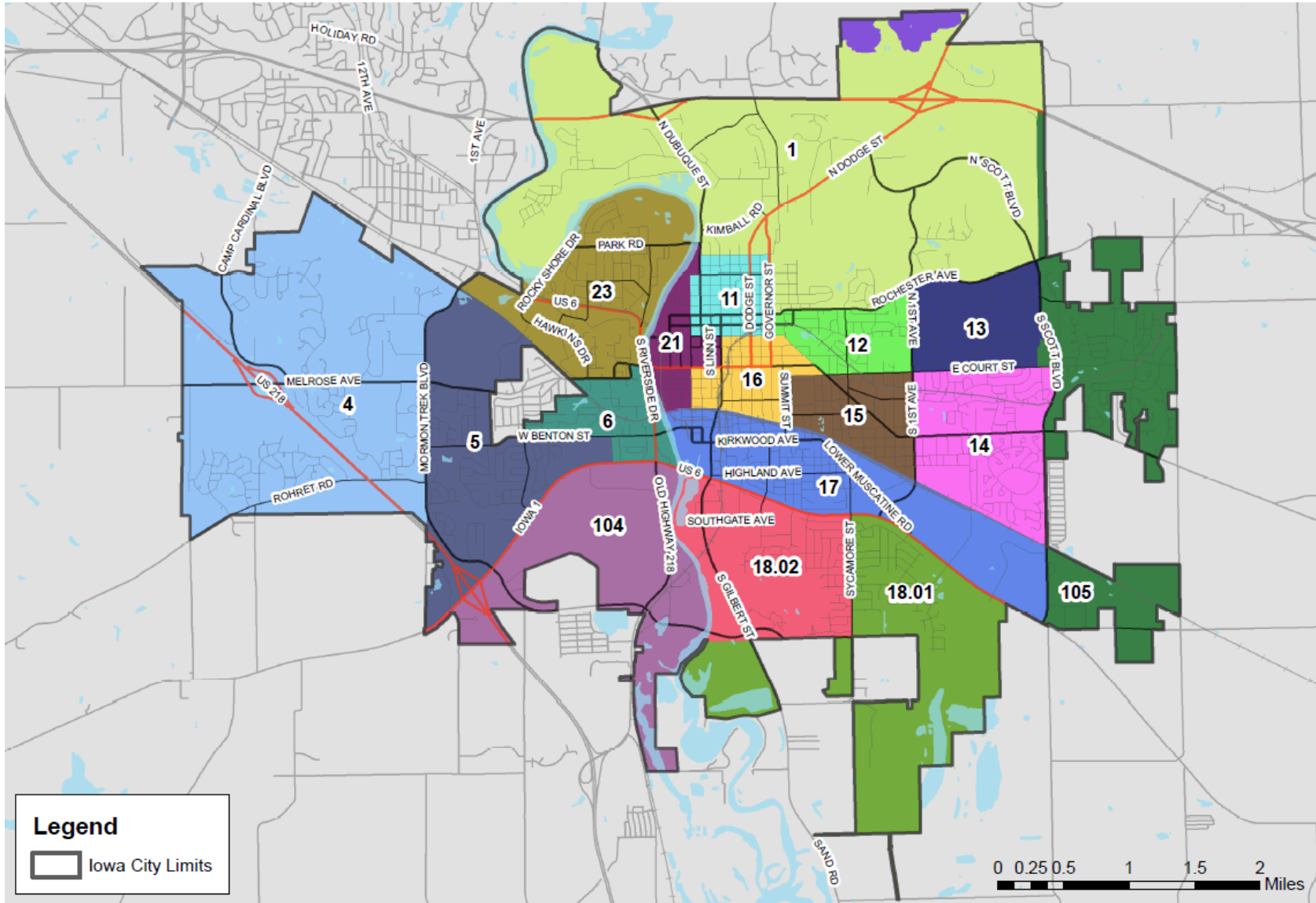
Tracts 6, 11, 16, 21, and 23 form the heart of the UI campus as well as downtown. They are called the Pentacrest tracts throughout the study and are primarily within one mile of the Pentacrest in central Iowa City. These tracts have traits unique from the rest of Iowa City because they contain much of the City's university students. This significantly impacts the characteristics of the area, as many college students living off-campus appear to be primarily extremely low incomes which may not reflect financial support from loans or parents. As such, they subsist on low incomes until they can enter the full-time workforce. Understanding the characteristics of the Pentacrest tracts allows for a more accurate fair housing profile to be developed for the entire City.

Examining concentrations of protected classes often occurs at the census tract level. Concentrations do not in themselves constitute a barrier to fair housing choice. However, they signal a need for further analysis if they are present with other potential negative factors such as low incomes, low educational outcomes, or other similar indicators that may be barriers to fair housing choice.



Picture of Pentacrest

FIGURE 3: IOWA CITY CENSUS TRACTS



Population and Age

Iowa City has experienced strong population growth for decades. In 2017, the Census Bureau estimate the population of the Iowa City at 75,788 with a metro population of 171,491. The City experienced the highest rate of increase during the 1960s, though its growth has remained strong since the 2000's. While Iowa City has grown at a rate well above that of the State of Iowa, it is lower than that of Johnson County due to the expansion of the neighboring Cities of Coralville, North Liberty, and Tiffin.

In addition to an increasing population, Iowa City is one of the densest urban areas in Iowa. Its population density was 2,935 persons per square mile in 2017, up from 2,804 in 2010. Among Iowa City's 17 census tracts, the five Pentacrest tracts are among the densest, containing approximately 33% of the City's population. Tract 16 is the most densely populated at more than 18,700 people per square mile, which increased from over 17,500 people per square mile in 2010. Tracts 21 and 11 are the next most densely populated, with more than 12,000 people per square mile. Tracts 4, 104, and 105 on the city's periphery are less densely populated, with less than 600 people per square mile.

The federal Fair Housing Acts do not expressly ban discrimination based on age, though age is a protected class by the City of Iowa City. As a result, landlords cannot refuse to rent or require special conditions to an older or younger person unless those standards apply to all tenants equally. The same applies to families with children. However, eligible housing for older persons may be exempt from this prohibition if they meet specific criteria.

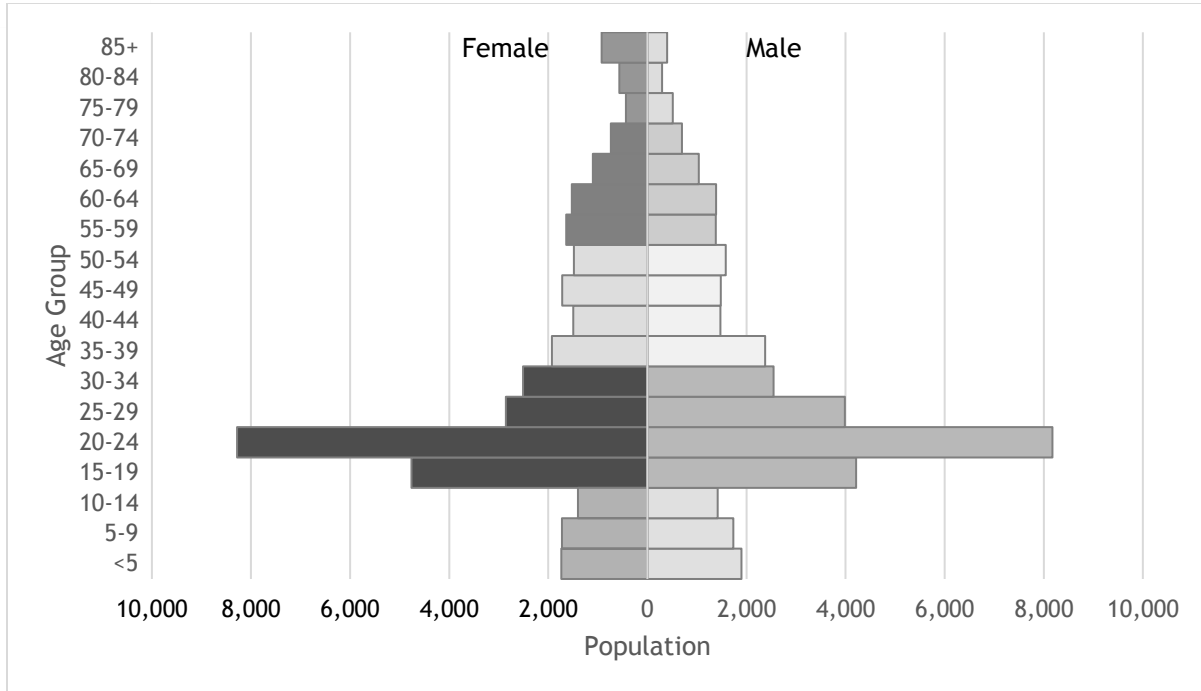
As would be expected due to the UI, the city's population is skewed towards younger adults. Nearly one third of the population is in its 20s, and another 10 % is 18 to 19 years old. That is more than double the percent of Iowa's population in that age range. Iowa City's population "pyramid" on p. XX clearly show the high proportion of young people. Conversely, the City has relatively fewer young children and adults over the age of 35 compared to the State, though the rest of Johnson County has a relatively high proportion of young families. Generally, the baby boomer generation comprises a smaller proportion of population of Iowa City in contrast to a stronger presence at the state level. Overall, this leads the median population of Iowa City to be 26 compared to 38 for Iowa. Recent changes in the City's age composition appear driven by young families and the aging of the Baby Boomers.

FIGURE 4: POPULATION CHANGE

	State of Iowa		Johnson County		Iowa City	
	Population	% Change	Population	% Change	Population	% Change
1960	2,757,537	5.2%	53,663	17.3%	33,443	22.9%
1970	2,824,376	2.4%	72,127	34.4%	46,850	40.1%
1980	2,913,808	3.2%	81,717	13.3%	50,508	7.8%
1990	2,776,755	-4.7%	96,119	17.6%	59,735	18.3%
2000	2,926,324	5.4%	111,006	15.5%	62,220	4.2%
2010	3,046,355	4.1%	130,882	17.9%	67,862	9.1%
2017	3,118,102	2.4%	144,425	10.3%	73,415	8.2%

Source: U.S. 1960-2010 Census, 2017 5-Year ACS

FIGURE 5: IOWA CITY POPULATION PYRAMID



Silent Generation
1925-1945

Baby Boomers
1946-1964

Generation X
1963-1983

Millennials
1983-2000

Generation Z
2001-Present

Source: 2017 5-Year ACS

FIGURE 6: CHANGE IN POPULATION BY CENSUS TRACT - 1990 TO 2017

	1990	2000	2010	2017	1990-2017 #	1990-2017 %
1 (part)	5,562	5,860	6,307	6,959	1,397	25.1%
4 (part)	4,213	5,687	6,875	7,317	3,104	73.7%
5 (part)	5,477	6,837	7,218	7,925	2,448	44.7%
6	3,870	3,157	3,001	3,468	-402	-10.4%
11	4,297	3,853	3,934	4,422	125	2.9%
12	2,100	2,052	1,928	1,986	-114	-5.4%
13	3,293	3,172	3,006	3,094	-199	-6.0%
14	4,383	4,524	4,587	4,941	558	12.7%
15	2,939	2,617	2,553	2,487	-452	-15.4%
16	6,395	6,646	7,267	7,763	1,368	21.4%
17	2,980	2,936	2,814	3,007	27	0.9%
18.01 (part)	3,511	4,152	4,920	5,319	1,808	51.5%
18.02	2,799	3,310	3,790	4,293	1,494	53.4%
21	3,940	3,625	3,784	4,037	97	2.5%
23	5,261	3,979	4,510	4,613	-648	-12.3%
104 (part)	5,803	6,568	6,758	6,775	972	16.7%
105 (part)	3,496	4,999	7,257	8,032	4,536	129.7%
Iowa City	59,738	62,220	67,862	73,415	13,677	22.9%

Source: U.S. Census Bureau, 2017 5-Year ACS (obtained from Social Explorer in 2010 geographies)

Households and Families

Women are protected against discrimination in housing under Title VIII of the Civil Rights Act of 1968, and the 1988 amendments added protections for families with children. Female-headed households can have trouble obtaining housing. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

A household is all people occupying a single housing unit. These can include houses, apartments, mobile homes, or rooms intended as a separate dwelling. This definition is subdivided into family and non-family households, depending on the relationships of those living in the housing unit. A family household is two or more people related by birth, marriage, or adoption, one of whom has the housing unit in their name. This includes married couples, single parents with children, siblings, and other arrangements of related persons. All people residing in such a unit are considered part of a single family household. Non-family households are either single persons living alone, or two or more non-related persons living together. For example, a student living with nonrelated roommates are a non-family household.

Iowa City has a smaller proportion of families compared to Iowa, and more persons living in group quarters, alone, or with unrelated people. In 2017, the City contained 29,697 households with an average household size of 2.24 persons. Approximately 90% of the City's population lived in households; the rest resided in group quarters like student dorms. As a comparison, 97% of State residents live in households.

Iowa City has a lower proportion of households with children and fewer married households, which is typical for a university town. Historically, family households declined as a proportion of the population from 49% in 1990 to 43% in 2010, though this rebounded to 44% in 2017. These trends are largely driven by changes in married couple households, which comprise about 77% of families. However, single-headed families increased over time as well. As of 2017, married couples make up just over one third of households.

Overall, 45% of families include children under 18. Only 41% of married couples had children, while a majority of single, female-headed households had children. 47% of single, male-headed households also had children living with, making them more likely than married couples to have children. When accounting for all households, 20% have children under 18 living with them.

Other Characteristics of Iowa City Households and Families:

- Nonfamily households occupied a majority of the City's housing stock in 2017, a trend that differs sharply from Iowa and the remainder of Johnson County. Of nonfamily households in Iowa City, approximately one third live alone, compared to 29% for the State and County. Nonfamily households increased as a proportion of households in Iowa City since 1990, though that trend subsided in 2017.
- The Pentacrest tracts contain far more nonfamily households (approximately 83% of households in these areas are nonfamily), and far fewer children and families. This would be expected in areas largely occupied by students.
- Outside of the Pentacrest tracts, married couple households were less likely to live in Tracts 15, 17, and 18.01, in which fewer than 40% of households were married. Tracts where married couples made up more than half of all households included tracts 1, 4, 13, and 104.
- Tracts 14, 17, and 18.02 all had single head-of-household families comprise more than 15% of total households. The highest was tract 18.02 where more than one quarter of households were single head-of-household families.
- Tracts 4 and 18.02 had the highest proportion of households with children, both over 30%, while more than a quarter of households in tracts 14, 15, 104, and 105 also had children.

The following charts illustrate the changing composition of households in Iowa City. Non-family households and households comprised of only one person are increasing while the more traditional married-couple family households are declining. These trends are common in cities with increasing university student populations such as Iowa City and impact the local housing market by increasing demand for smaller dwelling units to accommodate smaller households, and more rental units for the increasing number of one-person households.

FIGURE 7: HOUSEHOLDS BY TYPE

	Iowa		Johnson County		Iowa City	
	#	%	#	%	#	%
Total households	1,251,587	100.0%	57,423	100.0%	29,697	100.0%
Family households	800,576	64.0%	31,386	54.7%	13,175	44.4%
Married-couple family	635,516	50.8%	25,428	44.3%	10,184	34.3%
With own children under 18 years	245,674	19.6%	11,138	19.4%	4,217	14.2%
Male householder, no spouse	52,688	4.2%	1,903	3.3%	862	2.9%
With own children under 18 years	32,428	2.6%	1,150	2.0%	405	1.4%
Female householder, no spouse	112,372	9.0%	4,055	7.1%	2,129	7.2%
With own children under 18 years	72,545	5.8%	2,411	4.2%	1,349	4.5%
Nonfamily households	451,011	36.0%	26,037	45.3%	16,522	55.6%
Householder living alone	362,580	29.0%	16,447	28.6%	9,728	32.8%
Average household size	2.41		2.37		2.24	
Average family size	2.98		2.97		2.87	

Source: 2017 5-Year ACS

FIGURE 8: TRENDS IN HOUSEHOLD TYPES - 1990 TO 2017

	1990		2000		2010		2017	
	#	%	#	%	#	%	#	%
Total Households	21,951	100.0%	25,202	100.0%	27,657	100.0%	29,697	100.0%
Family Households	10,836	49.4%	11,200	44.4%	11,743	42.5%	13,175	44.4%
Married Couple	8,917	40.6%	8,868	35.2%	8,980	32.5%	10,184	34.3%
With Children	4,455	20.3%	4,008	15.9%	3,721	13.5%	4,217	14.2%
Female-Headed	1,496	6.8%	1,677	6.7%	1,984	7.2%	2,129	7.2%
With Children	976	4.4%	1,060	4.2%	1,216	4.4%	1,349	4.5%
Male-Headed	423	1.9%	655	2.6%	779	2.8%	862	2.9%
With Children	157	0.7%	287	1.1%	317	1.1%	405	1.4%
Non-Family and 1-person Households	11,115	50.6%	14,002	55.6%	15,914	57.5%	16,522	55.6%
Average Household Size	2.34	--	2.23	--	2.22		2.24	--

Source: U.S. Census Bureau

FIGURE 9: HOUSEHOLDS BY FAMILIAL STATUS BY CENSUS TRACT - 2017

Census Tract	Total Households	Family Households						Nonfamily households		With Own Children Under 18 Years	
		Married-couple		Single Male-Headed		Single Female-Headed		#	%	#	%
		#	%	#	%	#	%				
1 (part)	2,568	1,341	52.2%	60	2.3%	122	4.8%	1,045	40.7%	597	23.2%
4 (part)	3,076	1,577	51.3%	11	0.4%	111	3.6%	1,377	44.8%	985	32.0%
5 (part)	3,618	1,527	42.2%	92	2.5%	218	6.0%	1,781	49.2%	815	22.5%
6	1,888	244	12.9%	0	0.0%	152	8.1%	1,492	79.0%	167	8.8%
11	1,764	219	12.4%	39	2.2%	13	0.7%	1,493	84.6%	63	3.6%
12	932	423	45.4%	16	1.7%	50	5.4%	443	47.5%	211	22.6%
13	1,289	727	56.4%	6	0.5%	122	9.5%	434	33.7%	317	24.6%
14	2,126	1,014	47.7%	100	4.7%	359	16.9%	653	30.7%	629	29.6%
15	1,209	462	38.2%	36	3.0%	99	8.2%	612	50.6%	318	26.3%
16	3,346	218	6.5%	68	2.0%	62	1.9%	2,998	89.6%	65	1.9%
17	1,332	446	33.5%	77	5.8%	129	9.7%	680	51.1%	275	20.6%
18.01 (part)	2,191	773	35.3%	94	4.3%	211	9.6%	1,113	50.8%	562	25.7%
18.02	1,659	706	42.6%	116	7.0%	317	19.1%	520	31.3%	626	37.7%
21	769	19	2.5%	28	3.6%	12	1.6%	710	92.3%	5	0.7%
23	1,034	362	35.0%	8	0.8%	37	3.6%	627	60.6%	166	16.1%
104 (part)	2,569	1,631	63.5%	62	2.4%	61	2.4%	815	31.7%	738	28.7%
105 (part)	3,492	1,667	47.7%	155	4.4%	368	10.5%	1,302	37.3%	1027	29.4%
Iowa City	29,697	10,184	34.3%	862	2.9%	2,129	7.2%	16,522	55.6%	5,971	20.1%

Source: U.S. Census Bureau, American Community Survey 5-Year 2017

Race and Ethnicity

Race and color are both protected characteristics under the Fair Housing Act and Iowa City Human Rights Ordinance. For the purposes of this study, race is a person's self-identification with one or more social groups, such as white, black, Asian, or any combination thereof. Ethnicity determines whether a person is of Hispanic origin or not. Origin can be ancestry, nationality, or country of birth of the person or their parents or ancestors prior to their arrival in the United States. For this reason, ethnicity is broken into two categories, Hispanic/Latino and Not Hispanic/Latino. Hispanics may report as any race. White refers only to race, whereas non-Hispanic white refers to both race and ethnicity. The term Person of Color describes both nonwhite and Hispanic persons. These clarifications are critical due to the importance of race/ethnicity in ensuring fair housing choice.

Iowa City is more diverse than the State of Iowa and has one of the higher proportions of persons of color compared to other cities in Iowa. Iowa City had 17,832 residents of color (24% of the population) in 2017, compared to only 14% state-wide. The City has also become much more diverse over time; only 13,759 persons of color (20%) lived in Iowa City in 2010, which is up even more from 2000 (13%) and 1990 (9%). Based on population, Iowa City contains relatively large numbers of Asian/Pacific Islanders (8%), Black/African Americans (7%), and Hispanic/Latinos (6%). Compared to Iowa, the City also has a notably larger percentage who identify as two or more races.

In Iowa City in 2017:

Non-Hispanic White residents comprised 76% of the total population, less than the County and State. Most non-Hispanic whites are native born (approximately 96%)

The Asian/Pacific Islander population accounted for 8% of the City's population and approximately 33% of the total nonwhite and Hispanic population. Much of this population (some 4,551 residents) is foreign born.

Black residents represented 7% of the total population and nearly one-third (30%) of the total nonwhite and Hispanic population. Around one third of black residents are foreign born.

Hispanic/Latino residents made up 6% of the population and a quarter of the nonwhite and Hispanic population (25%). Approximately 43% of the Hispanic population is foreign born. The number of persons of Hispanic origin has increased rapidly since 1990.

Persons claiming ancestry from two or more races comprised 3% of the total population. Native American residents and those of other races comprise the remaining 0.5% of the population.

FIGURE 10: POPULATION BY RACE/ETHNICITY

Census Tract	Total Population	Non-Hispanic/Latino												Persons of Hispanic Origin	
		White		Black		Native American		Asian/Pacific Islander		Other		Two or More Races		#	%
		#	%	#	%	#	%	#	%	#	%	#	%		
1 (part)	6,959	5,553	79.8%	162	2.3%	0	0.0%	605	8.7%	3	0.0%	249	3.6%	387	5.6%
4 (part)	7,317	4,465	61.0%	867	11.8%	8	0.1%	1,629	22.3%	0	0.0%	152	2.1%	196	2.7%
5 (part)	7,925	5,408	68.2%	511	6.4%	11	0.1%	1,307	16.5%	0	0.0%	233	2.9%	455	5.7%
6	3,468	2,594	74.8%	253	7.3%	30	0.9%	389	11.2%	0	0.0%	137	4.0%	65	1.9%
11	4,422	3,953	89.4%	78	1.8%	18	0.4%	184	4.2%	0	0.0%	72	1.6%	117	2.6%
12	1,986	1,694	85.3%	18	0.9%	0	0.0%	83	4.2%	0	0.0%	52	2.6%	139	7.0%
13	3,094	2,668	86.2%	129	4.2%	0	0.0%	75	2.4%	22	0.7%	109	3.5%	91	2.9%
14	4,941	4,204	85.1%	341	6.9%	13	0.3%	160	3.2%	70	1.4%	90	1.8%	63	1.3%
15	2,487	2,106	84.7%	38	1.5%	8	0.3%	126	5.1%	0	0.0%	68	2.7%	141	5.7%
16	7,763	6,277	80.9%	351	4.5%	0	0.0%	513	6.6%	19	0.2%	150	1.9%	453	5.8%
17	3,007	2,464	81.9%	283	9.4%	0	0.0%	62	2.1%	0	0.0%	59	2.0%	139	4.6%
18.01 (part)	5,319	3,278	61.6%	1,060	19.9%	78	1.5%	155	2.9%	0	0.0%	17	0.3%	731	13.7%
18.02	4,293	2,242	52.2%	918	21.4%	6	0.1%	126	2.9%	0	0.0%	239	5.6%	762	17.7%
21	4,037	3,153	78.1%	145	3.6%	1	0.0%	262	6.5%	15	0.4%	126	3.1%	335	8.3%
23	4,613	3,733	80.9%	129	2.8%	5	0.1%	310	6.7%	12	0.3%	175	3.8%	249	5.4%
104 (part)	6,775	6,328	93.4%	95	1.4%	39	0.6%	34	0.5%	0	0.0%	15	0.2%	264	3.9%
105 (part)	8,032	7,128	88.7%	37	0.5%	0	0.0%	209	2.6%	0	0.0%	48	0.6%	610	7.6%
Iowa City	73,415	55,583	75.7%	5,329	7.3%	167	0.2%	5,939	8.1%	141	0.2%	1,844	2.5%	4,412	6.0%
Johnson Co	144,425	115,025	79.6%	9,064	6.3%	249	0.2%	9,145	6.3%	155	0.1%	2,913	2.0%	7,874	5.5%
Iowa	3,118,102	2,697,252	86.5%	104,194	3.3%	8,641	0.3%	73,455	2.4%	2,775	0.1%	53,491	1.7%	178,294	5.7%

Source: U.S. Census Bureau 2017 5-Year ACS

Households by Race and Ethnic Origin

The following table presents *households* by race of the householder. A householder is someone in whose name the home is owned, rented, or maintained. If no such person is present, any household member 15 years old or older serves as the householder. Non-Hispanic whites constitute 81% of householders compared to comprising 76% of the population. This suggests some of Iowa City's diversity is within households and/or non-Hispanic white households tend to be smaller.

in 2017, 24,611 out of 29,697 total households in Iowa City (83%) were White. Asians were the second largest racial category with 1,734 households (7%), followed by black households at 1,734 (6%). Hispanic households of any race were also a significant group at 1,179 (4%) households. Accounting for race and ethnicity, 19% of the City's households in 2017 were nonwhite or Hispanic. This is nearly twice as diverse as the State of Iowa at 10% of households.

Like for the overall population, households of color have grown faster than white households. From 2010 to 2017, overall households grew at 10% whereas non-Hispanic white households only grew 6%. During that same time Hispanic/Latino households grew at 24% and non-Hispanic nonwhite households grew 37%. By race, black households grew by 49% and Asian households at 33%. As a result, non-Hispanic white households decreased as a proportion, showcasing an increase in diversity of households as well as population. This increase in diversity is a long-term trend.

HUD defines areas of racial or ethnic concentration as geographic areas where the percentage of racial or ethnic groups is at least 10 percentage points higher than for the City. Often racial or ethnic concentrations occur by choice through shared cultural, social, or place-based connections. However, areas of racial or ethnic concentration may constitute an impediment to fair housing if they are not created by choice or if they coincide with potentially negative characteristics such as high rates of poverty, low educational attainment, or other disparities in access to opportunity. Using HUD's criteria, the following tracts are identified as areas of racial/ethnic concentration in 2017:

- **Tract 4:** 21% of householders in this tract are Asian/Pacific Islander, compared to 8% of all households. This area has been identified as a racial concentration since at least 2000.
- **Tract 18.02:** 17% of householders in this tract are black, compared to 6% of all households. This area was first identified as a racial concentration in 2010, at which time it also contained a concentration of Hispanic households.
- **Tract 23:** 18% of householders in this tract are Asian/Pacific Islander, compared to 8% of all households; this is the first year this concentration has been identified.

Population data would indicate Tract 18.01 as a racially concentrated area, but householder is used for this definition, so it is not considered a racial concentration. Tract 104 was identified as a concentration of Hispanic households in 2010 but is no longer an area of ethnic concentration. Areas that have seen the greatest increase in the diversity of households includes Tract 18.02 (a 14-percentage point decrease in non-Hispanic white households since 2010), Tract 21 (-10 percentage points), Tract 23 (-9 percentage points), and Tract 5 (-9 percentage points).

Research consistently finds that problems associated with segregation are exacerbated when combined with issues such as concentrated poverty. Neighborhoods of concentrated poverty can isolate residents from needed resources and networks and have long-term effects on outcomes for children growing up there. Concentrated poverty may also increase crime, negatively impact health and education outcomes, and restrict future employment and lifetime earnings. HUD identifies significant concentrations of people of color and poverty. As of 2017, HUD has not identified any Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) in Iowa City, though some areas of racial and ethnic concentrations do coincide with lower incomes and other potential signifiers of fair housing issues.

FIGURE 11: HOUSEHOLDS BY RACE AND HISPANIC ORIGIN OF HOUSEHOLDER

Census Tract	Total Households	Householder of One Race (may be Hispanic/Latino)										Householder of Two or More Races (May be Hispanic/Latino)		Householders of Hispanic Origin	
		White		Black		American Indian		Asian/Pacific Islander		Other		#	%	#	%
		#	%	#	%	#	%	#	%	#	%				
1 (part)	2,568	2,266	88.2%	33	1.3%	0	0.0%	148	5.8%	71	2.8%	50	1.9%	83	3.2%
4 (part)	3,076	2,139	69.5%	195	6.3%	0	0.0%	635	20.6%	14	0.5%	93	3.0%	59	1.9%
5 (part)	3,618	2,750	76.0%	290	8.0%	21	0.6%	449	12.4%	22	0.6%	86	2.4%	145	4.0%
6	1,888	1,471	77.9%	70	3.7%	15	0.8%	243	12.9%	26	1.4%	63	3.3%	26	1.4%
11	1,764	1,656	93.9%	44	2.5%	0	0.0%	56	3.2%	0	0.0%	8	0.5%	20	1.1%
12	932	859	92.2%	18	1.9%	0	0.0%	22	2.4%	6	0.6%	27	2.9%	29	3.1%
13	1,289	1,203	93.3%	21	1.6%	0	0.0%	45	3.5%	10	0.8%	10	0.8%	42	3.3%
14 (part)	2,126	1,920	90.3%	149	7.0%	13	0.6%	36	1.7%	8	0.4%	0	0.0%	21	1.0%
15	1,209	1,114	92.1%	9	0.7%	0	0.0%	38	3.1%	27	2.2%	21	1.7%	76	6.3%
16	3,346	2,765	82.6%	153	4.6%	0	0.0%	221	6.6%	92	2.7%	115	3.4%	92	2.7%
17 (part)	1,332	1,214	91.1%	96	7.2%	0	0.0%	9	0.7%	0	0.0%	13	1.0%	56	4.2%
18.01 (part)	2,191	1,721	78.5%	318	14.5%	10	0.5%	64	2.9%	78	3.6%	0	0.0%	190	8.7%
18.02	1,659	1,190	71.7%	280	16.9%	6	0.4%	47	2.8%	77	4.6%	59	3.6%	188	11.3%
21	769	682	88.7%	0	0.0%	0	0.0%	59	7.7%	0	0.0%	28	3.6%	52	6.8%
23	1,034	807	78.0%	0	0.0%	0	0.0%	189	18.3%	0	0.0%	38	3.7%	32	3.1%
104 (part)	2,569	2,427	94.5%	65	2.5%	2	0.1%	20	0.8%	52	2.0%	3	0.1%	101	3.9%
105 (part)	3,492	3,331	95.4%	16	0.5%	0	0.0%	61	1.7%	70	2.0%	14	0.4%	215	6.2%
Iowa City	29,697	24,611	82.9%	1,734	5.8%	63	0.2%	2,247	7.6%	431	1.5%	611	2.1%	1,179	4.0%
County	57,423	49,665	86.5%	2,901	5.1%	68	0.1%	3,344	5.8%	703	1.2%	742	1.3%	2,171	3.8%
Iowa	1,251,587	1,165,820	93.1%	35,431	2.8%	3,893	0.3%	23,124	1.8%	10,863	0.9%	12,456	1.0%	46,623	3.7%

Source: U.S. Census Bureau, ACS 5-year 2010 and 2017, B11001-B11001I

Segregation/Integration

Segregation is defined as a high concentration of persons of a specific protected characteristic in a particular area compared to a broader geography. Integration is the opposite, in that there is not a high concentration. Analyzing segregation and integration promotes a key purpose of the Fair Housing Act: to ensure open residential communities in which individuals may choose where they prefer to live without regard to race, color, religion, national origin, sex, familial status, or disability. While individuals are free to choose where they prefer to live, the Fair Housing Act prohibits policies and actions by entities and individuals that deny choice or access to housing or opportunity and result in the segregation of protected classes.

Dissimilarity indices are useful measures of the degree to which two groups are evenly distributed across an area. As such, it is commonly used for assessing residential segregation between two groups. The index provides values ranging from 0 to 100, where higher numbers indicate a higher degree of segregation among the two groups measured. HUD interprets indices of dissimilarity as follows:

Dissimilarity Index Value	Level of Segregation
0-39:	Low Segregation
40-54:	Moderate Segregation
55-100:	High Segregation

Context is important in interpreting the dissimilarity index as it does not indicate spatial patterns of segregation, just the relative degree of segregation. In addition, the index is less accurate for smaller populations, so only the largest groups are examined in this analysis.

When reading the following table calculated by HUD, the three columns on the left (1990 to 2010) show the dissimilarity index values for the City, while the three columns on the right (1990 to 2010) show the index values for the overall region. Note that the index only measures two groups at a time, so it does not necessarily measure segregation in areas with multiple groups.

FIGURE 12: RACIAL/ETHNIC DISSIMILARITY TRENDS

	City of Iowa City				Iowa City CBSA			
	1990	2000	2010	Current	1990	2000	2010	Current
Nonwhite/White	24.4	26.7	25.3	30.6	35.4	30.9	28.1	33.7
Black/White	18.1	30.5	34.8	41.9	35.4	38.6	38.1	46.1
Hispanic/White	18.1	18.5	28	31.9	21.5	21.3	29	35.1
Asian or Pacific Islander/White	33.7	33.3	29.7	35.1	46	41.4	38	44.3

Source: Decennial Census

Note: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

The nonwhite/white dissimilarity index is low for the City and region (around 31 in the City and 34 in the region), but the region tends to be more segregated than the City. Regardless, this indicates a low degree of separation between white individuals and persons of color, though it has increased since 1990 despite decreasing for the region. Some of this is likely due to increasing diversity in Iowa City, though it is clear that racial and ethnic minorities have not moved equally to different neighborhoods in the City. This could be by choice, or it could be by barriers to fair housing choice.

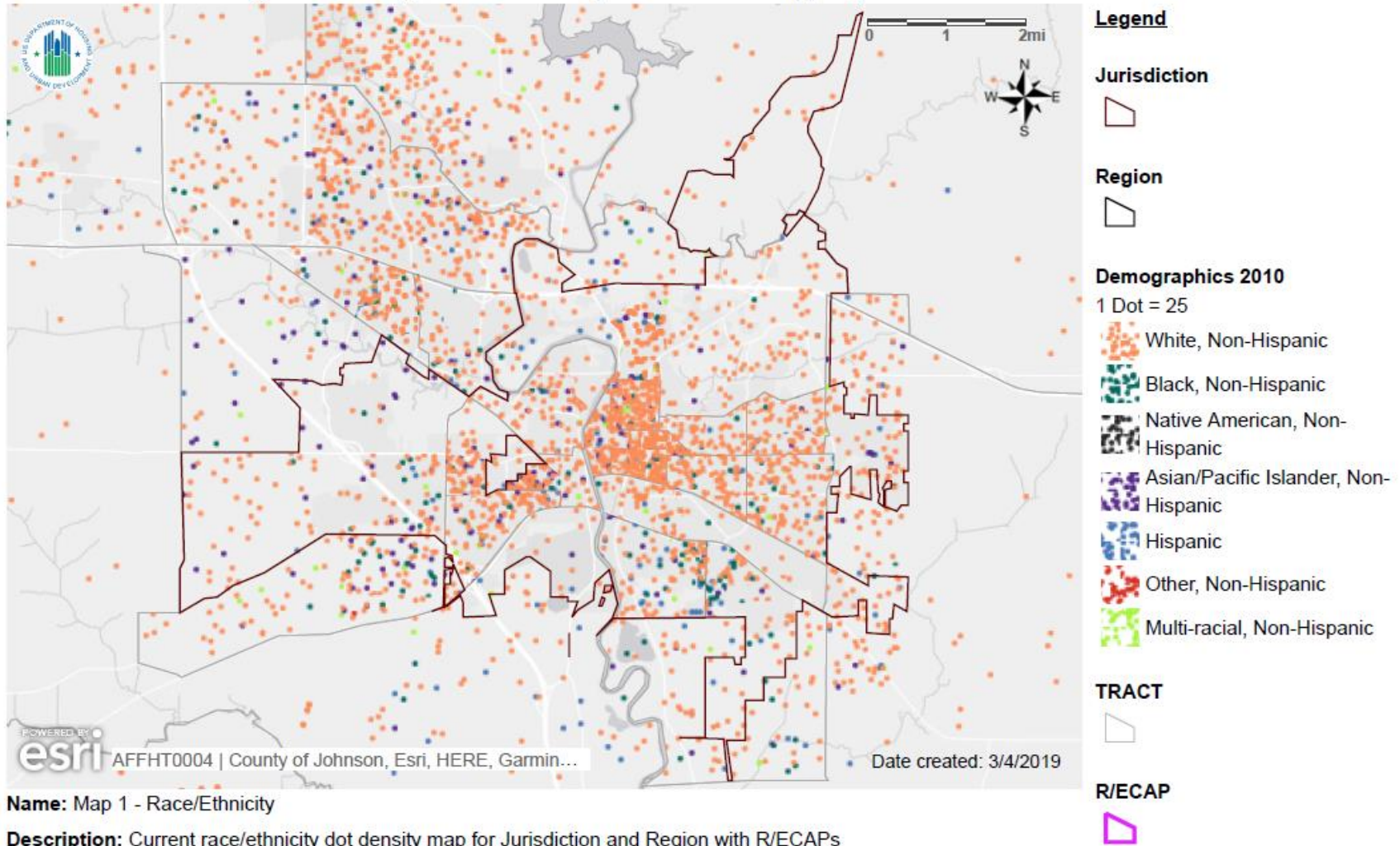
The black/white dissimilarity index is highest in the City and region and is the only index to reach a rating of “moderate segregation” for the City (around 42 in the City and 46 in the region). Conversely, the Hispanic/white dissimilarity index is the lowest (around 32 in the City and 35 in the region). Both black/white and Hispanic/white indices have increased since 1990, which mirrors the region. Asian/white dissimilarity remains relatively consistent.

Dot density maps show the residential distribution of racial and ethnic populations in the City and region. Dot density maps show spatial patterns through colored dots that represent a specified number of individuals sharing a specific characteristic. Residential segregation appears as clusters of a single color of dots representing one protected class, or as clusters of dots excluding one or more colors representing protected classes. More integrated areas will appear as a variety of colored dots. Dot placement also does not represent actual addresses - rather individual dots are randomly located within a census block to match aggregate population totals for that block group.

Segregation patterns are evident from the concentration of the white population in and near downtown, on the near westside, and areas to the east. Meanwhile, black and Hispanic households are clustered in the South District, especially around the Grant Wood/Wetherby neighborhoods. Asian households are largely clustered near the UI, specifically on the Westside and near and around downtown. Generally, the most integrated sections of town are those on the borders between the more segregated areas, including around the fringes of the South District and on the Westside. Only one Census tract is majority Hispanic/nonwhite, north of Melrose and west of Mormon Trek.

FIGURE 13: RACIAL/ETHNIC CONCENTRATIONS MAP

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Source: HUD AFFH Tool

Foreign Populations and Ancestry

It is illegal to refuse the right to housing based on place of birth or ancestry. The Census provides data on the native and foreign born populations. Meaningful language access is also important due to its link to national origin. Limited English proficiency (LEP) is anyone who does not speak English as a primary language and has a limited ability to read, write, speak, or understand English due to national origin. Housing providers who discriminate against LEP persons due to national origin may violate the Fair Housing Act, as may Federally-assisted housing providers have additional obligations to LEP persons.

Compared to Iowa, Iowa City is also more diverse in terms of the presence of foreign populations, backgrounds, and languages spoken. Approximately 86% of Iowa City residents were born as U.S. citizens, compared to 95% for Iowa. Only about half of Iowa City residents were born in Iowa. In 2017, Iowa City's foreign born population is proportionally nearly 3 times larger than that of the State at 5%. Iowa City has always been diverse, but this has especially increased recently. In 2000, there were 5,136 foreign born persons residing in Iowa City (8% of the population). This increased to 6,353 persons in 2010, and to 10,209 in 2017, now comprising 14% of the City's population.

Over that same time, the proportion of foreign born residents who were naturalized increased from 25% to 27% of the foreign born population. Naturalization is the conferring of citizenship upon a person after birth (this does not speak to legal status of foreign born residents). In Iowa, close to 38% of foreign born residents are naturalized citizens. Another 7,419 residents in Iowa City (10% of the population) were not citizens. A high number of foreign born residents with fewer naturalized citizens is expected given the university's robust foreign exchange programs, job opportunities, and the transient nature of many Iowa City residents. Many of these are likely students and faculty members from foreign countries studying or teaching at the University and its Hospital and Clinics system.

In 2017, the five largest foreign born populations in Iowa City comprised nearly half of total foreign born residents. These included: 2,529 residents from China, 1,074 from Mexico, 716 from Korea, 397 from India, and 327 from Sudan. 82% of foreign born populations speak a language other than English at home. In total, 44% of foreign born populations speak English less than "very well." The most common languages spoken at home other than English include:

FIGURE 14: LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER

Language	#
Spanish	3,194
Chinese, including Mandarin and Cantonese	2,431
Arabic	884
Korean	678
French, Haitian, or Cajun	667

Source: 2017 5-Year ACS

In 2017, the tracts with the highest rates of foreign born population included Tracts 4, 5, 6, 18.01, and 18.02, all of which were over the City-wide average. Tract 4 had the highest proportion with nearly a third of residents being foreign born. In 2000, Tract 4 was the only one even close to its current proportion of the population, suggesting many foreign born residents have either chosen to co-locate near existing social networks of immigrants, or by the price and availability of housing in the community.

FIGURE 15: ANCESTRY - 2017

Census Tracts	Total Population	Native Born Population		Foreign Born Population					
				Naturalized Citizens		Not Citizens		Total Foreign Born	
				#	%	#	%	#	%
1 (part)	6,959	6,211	89.3%	253	3.6%	495	7.1%	748	10.7%
4 (part)	7,317	5,037	68.8%	593	8.1%	1,687	23.1%	2,280	31.2%
5 (part)	7,925	6,303	79.5%	340	4.3%	1,282	16.2%	1,622	20.5%
6	3,468	2,825	81.5%	84	2.4%	559	16.1%	643	18.5%
11	4,422	4,196	94.9%	44	1.0%	182	4.1%	226	5.1%
12	1,986	1,859	93.6%	50	2.5%	77	3.9%	127	6.4%
13	3,094	2,948	95.3%	52	1.7%	94	3.0%	146	4.7%
14 (part)	4,941	4,698	95.1%	232	4.7%	11	0.2%	243	4.9%
15	2,487	2,294	92.2%	33	1.3%	160	6.4%	193	7.8%
16	7,763	6,802	87.6%	243	3.1%	718	9.2%	961	12.4%
17 (part)	3,007	2,856	95.0%	74	2.5%	77	2.6%	151	5.0%
18.01 (part)	5,319	4,276	80.4%	340	6.4%	703	13.2%	1,043	19.6%
18.02	4,293	3,390	79.0%	300	7.0%	603	14.0%	903	21.0%
21	4,037	3,673	91.0%	103	2.6%	261	6.5%	364	9.0%
23	4,613	4,241	91.9%	83	1.8%	289	6.3%	372	8.1%
104 (part)	6,775	6,300	93.0%	136	2.0%	339	5.0%	475	7.0%
105 (part)	8,032	7,582	94.4%	205	2.6%	245	3.1%	450	5.6%
Iowa City	73,415	63,206	86.1%	2,790	3.8%	7,419	10.1%	10,209	13.9%

Source: U.S. Census Bureau, 2017 5-year ACS

Disability Characteristics

The Census reports disability status for civilian non-institutionalized persons. A disability is defined as a long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

While individuals with disabilities may experience the same fair housing issues as individuals without disabilities, they also may experience additional barriers that are distinct from those experienced by individuals without disabilities. Discrimination based on physical, mental or emotional disability, provided reasonable accommodation or modification can be made, is prohibited under the Fair Housing Act. Reasonable accommodations or modifications may include reasonable changes to address the needs of the individual through adaptive structural changes as well as administrative changes. Examples might include adding a grab bar to a tenant's bathroom, allowing a tenant to transfer to a ground-floor unit, or permitting an assistance animal in a "no pets" building.

In 2017, Iowa City had an estimated 73,058 non-institutionalized civilians. Of these, 5,371 persons (7%) had at least one disability, which captures a variety of characteristics including hearing, vision, cognitive, ambulatory (walking/climbing), self-care, and independent living. This number has increased over time, likely due to the general aging of the population. Overall, Iowa City's population has a lower proportion of individuals with disabilities relative to the state, where 12% of noninstitutionalized civilians have a disability.

The presence of disabilities varies by age, with the likelihood of disability increasing throughout life with a sharp increase after 75 years. In Iowa City, 3% of persons under 18 years are disabled, 6% for those aged 18 to 64 years, 15% for those 65 to 74 years, and 48% for those 75 years or more. In all age groups except those 75 years and older, Iowa City has a smaller proportion of individuals with disabilities than Iowa. This can likely be attributed to Iowa City's strong health care industry which likely attracts older adults who may need greater access to healthcare.

The most common disabilities are cognitive, independent living, and ambulatory, each of which affect over 1,800 persons in Iowa City. Native Americans and non-Hispanic whites are most likely to be classified as disabled. Tracts 17, 18.01, and 105 have the highest proportions of persons with disabilities, which range between 10% and 11% of their population. Generally, persons with disabilities are relatively integrated in community-based settings.

FIGURE 16: DISABILITY BY SELECTED CHARACTERISTICS

	Iowa City			Johnson County			Iowa		
	Total	With a Disability	% With Disability	Total	With a Disability	% With Disability	Total	With a Disability	% With Disability
Noninstitutionalized Civilian Population	73,058	5,371	7.4%	142,813	10,053	7.0%	3,074,216	356,551	11.6%
By Sex									
Male	36,412	2,712	7.4%	70,187	5,056	7.2%	1,523,920	177,961	11.7%
Female	36,646	2,659	7.3%	72,626	4,997	6.9%	1,550,296	178,590	11.5%
By Race									
White	57,985	4,615	8.0%	118,460	8,908	7.5%	2,785,793	331,023	11.9%
Black or African American	5,354	323	6.0%	9,000	527	5.9%	102,904	11,078	10.8%
Native American	190	60	31.6%	272	65	23.9%	10,385	1,851	17.8%
Asian/Pacific Islander	5,939	259	4.4%	9,145	364	4.0%	73,925	3,703	5.0%
Some other race	1,552	9	0.6%	2,505	10	0.4%	39,226	2,528	6.4%
Two or more races	2,038	105	5.2%	3,431	179	5.2%	61,983	6,368	10.3%
By Ethnicity									
Non-Hispanic White alone	55,300	4,449	8.0%	113,690	8,714	7.7%	2,659,860	322,399	12.1%
Hispanic/Latino (any race)	4,387	187	4.3%	7,827	256	3.3%	176,818	12,259	6.9%
By Age									
Under 5 years	3,636	13	0.4%	8,885	26	0.3%	196,458	1,440	0.7%
5 to 17 years	8,018	290	3.6%	20,340	755	3.7%	530,069	27,872	5.3%
18 to 34 years	35,536	1,346	3.8%	53,365	1,956	3.7%	704,105	41,251	5.9%
35 to 64 years	19,377	1,773	9.2%	45,766	3,338	7.3%	1,166,212	134,104	11.5%
65 to 74 years	3,533	542	15.3%	8,797	1,342	15.3%	265,511	58,287	22.0%
75 years and over	2,958	1,407	47.6%	5,660	2,636	46.6%	211,861	93,597	44.2%
By Disability									
Hearing difficulty		1,486	2.0%		3,120	2.2%		114,277	3.7%
Vision difficulty		927	1.3%		1,874	1.3%		54,606	1.8%
Cognitive difficulty		2,261	3.1%		3,924	2.7%		127,569	4.1%
Ambulatory difficulty		1,919	2.6%		3,619	2.5%		168,273	5.5%
Self-care difficulty		824	1.1%		1,394	1.0%		59,335	1.9%
independent living difficulty		1,805	2.5%		2,873	2.0%		108,528	3.5%

Source: U.S. Census Bureau, 2017 5-Year ACS, Table S1810

Economic Profile

The economic characteristics of an area have a large impact on where and how people live. The occupation of various residents is a major factor in determining income, which can limit or expand their housing options. Unfortunately, a person's earning potential can be influenced by their association with one or more protected classes due to various relationships between household income, household type, race/ethnicity, and other factors. These relationships often create misconceptions and biases that could raise fair housing concerns.

Geographic division by income can also be a problem for cities trying to promote fair housing choice, especially when income can be related to protected characteristics. This section analyzes the complicated relationship between the workforce, employment, income, and distribution of low-income households and those in poverty across the City and how these factors relate to protected classes in Iowa City.

Labor Force

The economy of metro Iowa City is diversified, robust, and vibrant. Though it is anchored by the University of Iowa, the Great Recession from 2007 through 2009 impacted Iowa City and reduced business development and employment options. Since that time, the City has witnessed strong growth and low unemployment, even though its labor force has still not fully recovered.

Since 2000, the City's unemployment rate has fluctuated, but it has consistently remained below 4.0%. Unemployment hit its peak at the end of the Great Recession in 2009. It has fallen almost every year since then and hit its lowest mark at 1.9% in 2018. Johnson County experienced similar patterns of unemployment, though its peak was higher at 4.4%. Both the City and County have had consistently lower rates than those of the State, which peaked at 6.4% unemployment in 2009 and currently has an unemployment rate of 2.6% for 2018.

Even as the City's and County's unemployment rates remain low, the labor force has expanded to accommodate the growing economy. Since 2000, Iowa City's civilian labor force increased by 15% from 37,300 to 42,842 workers. However, this is shy of its labor force peak in 2009. Over that same timeframe, Johnson County's labor force increased by 27% from 67,117 to 85,400 workers. Unlike the City, it is currently in its peak. Iowa City contains a majority of the County's labor force, though as a proportion of workers, it has decreased from 56% in 2000 to 50% in 2018. With increasing labor force and decreasing unemployment, both the City and County had their largest number of employed workers in 2018. Meanwhile, the State's labor force has experienced healthy growth as well, though only an increase of 6% since 2000. Its labor force peaked in 2015.

In 2017, the male unemployment rate was marginally higher than the rate for females, a trend that has held true since 2000. Unemployment rates were lowest among Asians/Pacific Islander, Other Races, and multi-racial workers in Iowa City. In Johnson County, white workers also had low unemployment rates. In both the City and the County, blacks and Hispanics had the highest unemployment rates of racial groups. Notably, persons with disabilities had the highest rate of unemployment in Iowa City at 9.0%, significantly higher than the unemployment rate for persons with disabilities in the County but consistent with the State.

The following charts and table present Iowa City's labor force characteristics and compares the City's data with Johnson County and the State. The data is presented by sex, race, and persons of Hispanic origin and outlines employed and unemployed civilians.

FIGURE 17: LABOR FORCE TRENDS IN IOWA CITY

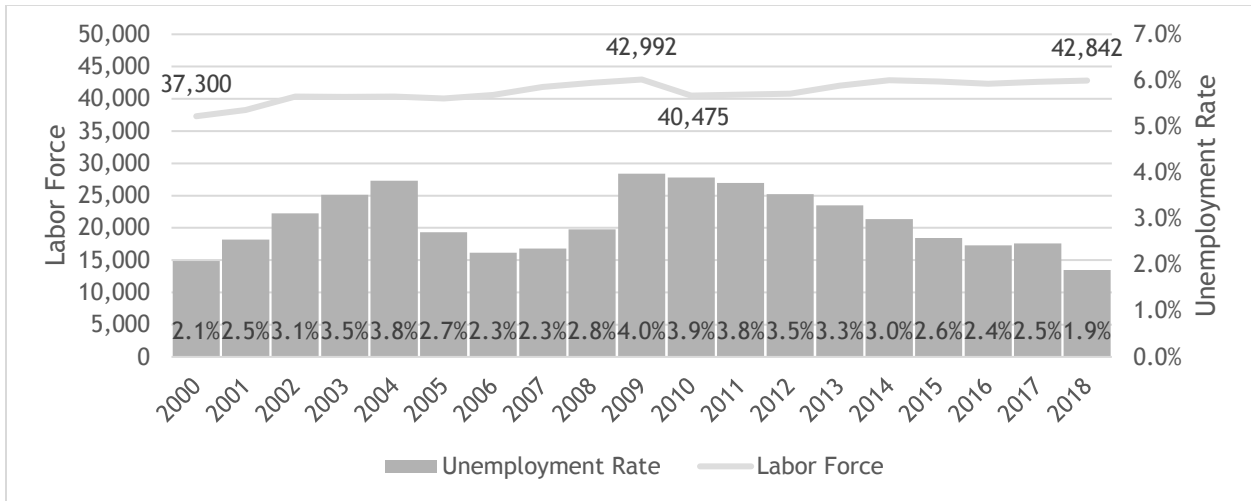


FIGURE 18: LABOR FORCE TRENDS IN JOHNSON COUNTY

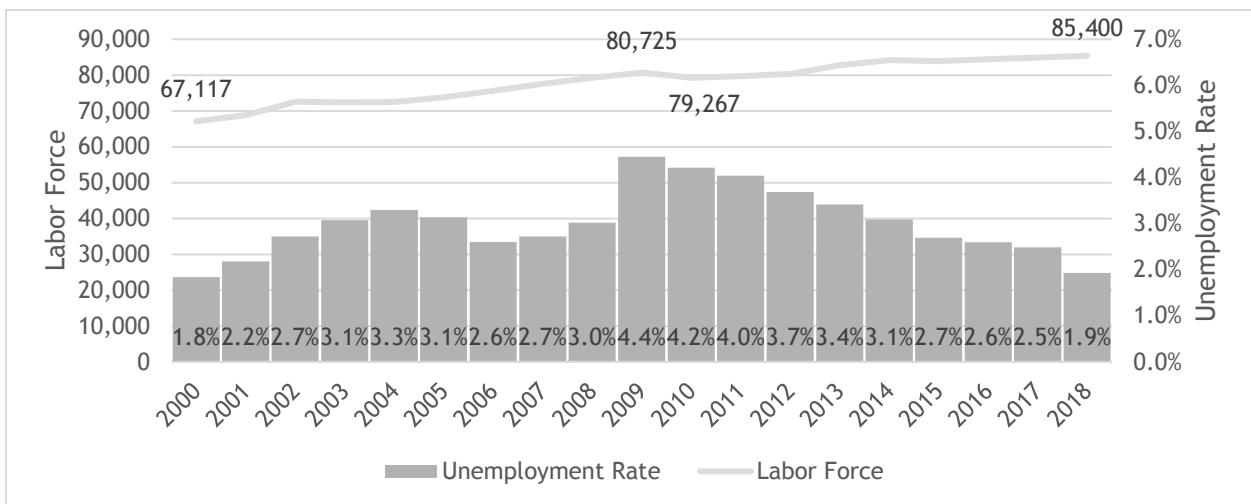
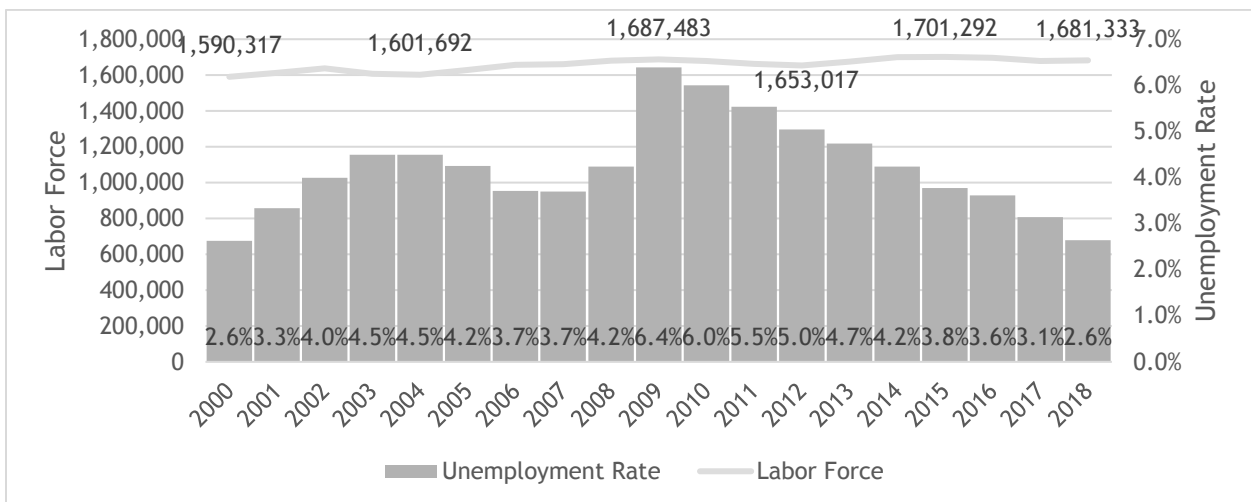


FIGURE 19: LABOR FORCE TRENDS IN IOWA



Source: Iowa Workforce Development

FIGURE 20: COMPARATIVE UNEMPLOYMENT RATE BY SELECTED CHARACTERISTICS, 2017

	Iowa City Unemployment Rate	Johnson County Unemployment Rate	State of Iowa Unemployment Rate
Overall (Per Census)	4.6%	3.3%	4.1%
Sex			
Male	4.8%	3.6%	4.4%
Female	4.3%	2.9%	3.9%
Disability			
With any disability	9.0%	5.6%	9.1%
Race			
White	4.6%	3.1%	3.8%
Black	6.8%	5.8%	10.3%
Asian	3.9%	3.1%	5.2%
Other Races	3.0%	5.7%	7.8%
Two or More Races	1.2%	2.7%	8.3%
Ethnicity			
Hispanic or Latino	5.5%	5.9%	7.4%
Non-Hispanic or Latino	4.5%	3.1%	4.0%
Foreign Born			
Native	4.6%	3.1%	4.0%
Foreign Born	4.5%	4.6%	5.8%

Source: U.S. Census Bureau, ACS 5-year 2017, Population 16 years and older

Employers

The Iowa City metro region is home to several nationally-recognized companies, the University of Iowa (UI), and the University of Iowa Hospital and Clinics system (UIHC). Cumulatively, these businesses and institutions constitute a major employment center in Iowa City. The research and development capabilities of the university have aided regional businesses by providing an educated labor force and supporting entrepreneurial activity, thus benefiting the State and the nation.

The following table lists the region's top 20 employers in 2018, which include institutions of higher education, public administration, health services, financial services, and manufacturing. UI and the UIHC system are the top two employers in the region, providing jobs for over 27,000 persons. This is more than the remaining top employers combined. Education and medical services provided nearly 34,000 of the 42,616 jobs accounted for in the following chart.

FIGURE 21: TOP 20 EMPLOYERS IN THE GREATER IOWA CITY REGION - 2018

Employer	Employees
University of Iowa	18,330
University of Iowa Health Care	8,704
Iowa City Community School District	2,346
Mercy Iowa City	1,643
Veteran's Health Administration	1,351
ACT, Inc.	1,350
Pearson Educational Measurement	1,200
Hy-Vee Iowa City (3 locations)	1,166
City of Iowa City	1,108
Systems Unlimited	838
International Automotive Components	750
Schenker Logistics Inc.	632
Wal-Mart	602
Procter & Gamble	600
Oral-B Laboratories	530
Johnson County Government	435
Alpla of Iowa	360
Reach for Your Potential	250
R R Donnelley	217
Durham School Services	204

Source: Iowa City Area Development, LOIS

From 2011 to 2017, overall jobs increased by 7,801 at a rate of 10%. The majority of the growth came from the private sector. However, the public sector increased as a proportion of total jobs with federal employment increasing by 19% and State and Local government (which includes all employees of the UI and UIHC) increasing at 14%.

Most employment in Johnson County is tied to providing services rather than goods. In 2017, more than 90% of employment is in the service-providing sector. According to Iowa Workforce Development (IWD), retail trade employs 9,464 and accounts for 17% of all private sector jobs. Accommodation/ Food Services employs 8,548 and accounts for another 15% of private sector jobs, while Health Care/Social Assistance sector employs 8,214 and account for 15% of private sector jobs. For public sector jobs, Educational Services and Health Care/ Social Assistance account for 89% of jobs. As a result, these are the largest two sectors of Johnson County's economy overall.

Health Care/Social Assistance experienced the greatest expansion in Johnson County employees from 2011 to 2017 with employment increasing by 3,533 jobs (24%). Educational Services also increased

significantly by 2,392 jobs (16%) in that time. Other substantially expanding industries included Accommodations/ Food Services with 1,594 new employees (23%) and Professional/Scientific/Technical with 884 new jobs (49%). Smaller industries, including Agriculture/Forestry/Fishing/Hunting and Finance/Insurance also experienced high growth rates. Industries with job losses included Information (-1,834 jobs at -75%), Administrative/Support/Waste (-506 jobs at -13%), Transportation/Warehousing (-462 jobs at -9%), and Manufacturing (-357 jobs at -7%). These losses were offset by impressive gains in other industries.

IWD's 10-year industry projections suggest that employment will increase most in the higher-skill, higher-wage sectors, including some in which Iowa City already has a strong presence. These include Healthcare/Social Assistance and Educational Services, in addition to Administrative/Support/Waste, Construction, and Transportation/Warehousing. Some smaller sectors are also expected to grow quickly including Management, and Agriculture/Forestry/Fishing/Hunting.

FIGURE 22: TRENDS IN EMPLOYMENT BY INDUSTRY - 2011 TO 2017

	2011	2012	2013	2014	2015	2016	2017	# Change 2011-2017	% Change 2011-2017	
All Industries in Johnson County	76,347	77,885	79,626	80,253	81,551	83,102	84,148	7,801	10.2%	
EMPLOYMENT BY INDUSTRY										
Goods- Producing	Agriculture, Forestry, Fishing & Hunt	101	105	127	139	132	134	144	43	41.9%
	Mining, Quarrying, & Oil & Gas Extraction	68	68	73	77	88	90	76	8	11.4%
	Construction	2,268	2,445	2,591	2,701	2,876	2,967	2,917	649	28.6%
	Manufacturing	5,332	5,337	5,600	5,314	5,266	5,329	4,975	-357	-6.7%
Service- Providing	Utilities	106	104	108	109	113	113	111	5	4.8%
	Wholesale Trade	1,293	1,327	1,295	1,285	1,284	1,250	1,302	9	0.7%
	Retail Trade	8,523	8,682	8,743	8,751	9,227	9,388	9,465	942	11.1%
	Transportation & Warehousing	4,899	4,858	4,834	4,512	4,149	4,337	4,437	-462	-9.4%
	Information	2,435	2,379	2,284	2,178	2,198	617	601	-1,834	-75.3%
	Finance & Insurance	2,053	1,864	1,973	2,154	2,422	2,532	2,561	508	24.7%
	Real Estate, Rental, Leasing	693	673	728	738	767	809	817	124	17.9%
	Professional, Scientific, Technical	1,809	2,070	2,257	2,240	2,353	2,481	2,693	884	48.8%
	Management of Companies & Enterprises	319	311	281	279	354	363	363	44	13.7%
	Administrative, Support, Waste Mgmt	4,027	4,118	3,718	4,065	3,970	3,795	3,521	-506	-12.6%
	Educational Services	15,473	15,873	16,097	16,102	16,083	17,625	17,865	2,392	15.5%
	Health Care & Social Assistance	14,969	15,353	15,986	16,442	16,946	17,800	18,502	3,533	23.6%
	Arts, Entertainment & Recreation	553	531	612	589	591	601	667	113	20.5%
	Accommodations & Food Services	6,953	7,255	7,766	8,003	8,217	8,272	8,547	1,594	22.9%
Other Services (except Public Admin)	1,636	1,632	1,659	1,724	1,714	1,718	1,762	126	7.7%	
Public Administration	2,835	2,901	2,894	2,852	2,803	2,882	2,821	-14	-0.5%	
EMPLOYMENT BY OWNERSHIP										
Private	51,574	52,531	53,796	54,146	55,075	55,608	55,836	4,262	8.3%	
Federal	1,739	1,740	1,799	1,922	1,980	2,039	2,071	332	19.1%	
State & Local	23,034	23,614	24,031	24,185	24,496	25,455	26,241	3,207	13.9%	

Italics indicates estimation, Source: Iowa Workforce Development/Bureau of Labor Statistics Quarterly Census of Employment & Wages (QCEW)

Income and Wages

In 2017, the median household income (MHI) in Iowa City was \$45,991, lower than both the County and State MHIs at \$59,965 and \$56,965 respectively. This represents an increase of 13% above the 2010 MHI of \$40,716, not adjusting for inflation. Adjusting for inflation, this represents only an increase of less than 1%. Compared to wage increases through the 1990's and 2000's, recent growth is weak.

Of ethnic groups for which data is available, non-Hispanic White householders had an MHI of \$50,424 in 2017, 18% higher than their MHI of \$50,151 in 2010. Hispanic householders also had higher MHIs of \$45,285 in 2017, an increase of 19% over 2010.

For racial groups of all ethnicities, householders of another race had an MHI of \$45,933 in 2017, black householders were the next highest at \$27,667, followed by Asian householders (\$26,997), and householders of two or more racial groups (\$22,268). Since 2010, black householders had the largest increase (56%), followed by householders of two or more races (20%), and householders of another race (5%). Asian householders were the only group that had a decrease in MHI, from \$39,359 in 2010 to \$26,997 in 2017, a 31% drop. Historically, this group had relatively higher incomes. This recent drop in MHI most likely reflects the large increase in students from China and other Asian countries, which took off around the time of the Great Recession.

There is spatial variation in MHI across the City. The Pentacrest tracts include four of the lowest income tracts in the City (6, 11, 16, and 21) which ranged from MHIs of \$16,183 to \$24,452 in 2017. Outside of this area, a few tracts also showed lower than expected MHIs for different racial/ethnic groups:

- Tract 4 had MHIs for black householders of \$19,267
- Tract 105 had an MHI of \$26,369 for Asian households and \$44,128 for households of other races
- Tract 18.02 had an MHI of \$21,534 for householders of two or more races and \$26,000 for Hispanic householders
- Tract 5 had an MHI of \$36,205 for Hispanic householders
- Tract 17 had an MHI of \$46,976 for non-Hispanic white householders

The five areas with the highest MHIs were Tracts 1, 12, 13, 14, and 104, all of which had MHIs between \$65,000 and \$95,000 in 2017. Three areas, Tracts 5, 17, and 18.02 saw MHIs decrease from 2010 to 2017. Six tracts had MHIs increase by more than 20%: Tracts 1, 4, 6, 13, 21, and 23. Lower overall wages is partially due to students, though there are many non-student households that also have low wages.

IWD estimated annual salaries in Johnson County averaged \$49,796 in 2017. Wages were lowest in lower-skill and part-time fields such as Arts/Entertainment/Recreation (\$11,682) and Accommodations/Food Services (\$16,001). Wages tended to be higher in high-skill and knowledge-based fields like Educational Services (\$76,706) and smaller skilled fields such as Utilities (\$87,845) and Management (\$74,767). The City's largest industry, Healthcare/Social Assistance, has an average wage of \$51,062. From 2011 to 2017, wages increased 17%. Accounting for inflation, the average wage increased by 8%. Only wages for Information and Arts/Entertainment/Recreation decreased since 2011 by -10% and -7% respectively.

Generally, Iowa City has a higher cost of living than Iowa with a cost of living index of 100.9 compared to Iowa's cost of living at 89.5 (100 is the US average). Minimum wage in Iowa is \$7.25 per hour, but Johnson County has a voluntary minimum wage of \$10.27 per hour.

FIGURE 23: IOWA CITY MEDIAN HOUSEHOLD INCOME TRENDS BY RACE/ETHNICITY

		2010	2017	% Change
Any Ethnicity	White	\$42,376	\$50,322	18.8%
	Black	\$17,798	\$27,667	55.5%
	Asian	\$39,359	\$26,997	-31.4%
	Another Race	\$43,750	\$45,933	5.0%
	Two or More Races	\$18,533	\$22,268	20.2%
Non-Hispanic White		\$42,868	\$50,424	17.6%
Hispanic/Latino		\$38,138	\$45,285	18.7%
Iowa City		\$40,716	\$45,991	13.0%
Johnson County		\$51,380	\$59,965	16.7%
Iowa		\$48,872	\$56,570	15.8%

Source: U.S. Census Bureau. ACS 5-Year 2010 and 2017, not adjusted for inflation, includes estimates are based on available data

FIGURE 24: IOWA CITY MEDIAN HOUSEHOLD INCOMES TRENDS BY CENSUS TRACT

Tract	2010	2017	% Change
1 (part)	\$61,211	\$87,041	42.2%
4 (part)	\$45,116	\$58,534	29.7%
5 (part)	\$49,199	\$46,592	-5.3%
6	\$27,224	\$33,125	21.7%
11	\$21,861	\$24,452	11.9%
12	\$60,652	\$66,957	10.4%
13	\$76,493	\$93,304	22.0%
14 (part)	\$63,568	\$69,936	10.0%
15	\$52,636	\$62,702	19.1%
16	\$16,031	\$18,050	12.6%
17 (part)	\$48,160	\$44,421	-7.8%
18.01 (part)	\$41,681	\$44,863	7.6%
18.02	\$45,110	\$41,607	-7.8%
21	\$12,226	\$16,183	32.4%
23	\$40,605	\$51,667	27.2%
104 (part)	\$54,440	\$65,136	19.6%
105 (part)	\$56,287	\$62,500	11.0%
Iowa City	\$40,716	\$45,991	13.0%

Source: U.S. Census Bureau, ACS 5-Year 2010 and 2017, not adjusted for inflation

Low- and Moderate-Income Persons

The following table outlines the percentage of low-moderate income (LMI) persons in the City by census block group. This information is calculated by HUD to determine area eligibility for the Community Development Block Grant (CDBG) Program. Persons deemed LMI have incomes at or below 80% of the area median income (AMI) which was as follows for 2018:

FIGURE 25: LMI THRESHOLDS

Household Size	1	2	3	4	5	6	7	8
80% Median Income	\$48,750	\$55,700	\$62,650	\$69,600	\$75,200	\$80,750	\$86,350	\$91,900

Source: HUD, effective 6/1/2018 through 6/28/2019

HUD's formula for calculating LMI includes persons residing in households and excludes persons residing in group quarters. The group quarter population includes persons under formally authorized supervised care or custody such as correctional institutions, nursing homes, and juvenile institutions. It also includes non-institutionalized persons living in group quarters such as college dormitories, military quarters, and group homes.

Based on the 2015 American Community Survey data, HUD determined that there were 38,410 LMI persons in Iowa City, equivalent to 59% of the population for which this rate is calculated. This is an increase from 53% estimated in 2000 and 2010, and it is a higher the number of Census Block Groups now have at least 51% of LMI residents.

All block groups within the Pentacrest tracts are primarily occupied by LMI persons except for Manville Heights. Other block groups that are at considered by HUD to be an LMI area include:

- Grant Wood (Tract 18.01, Block Group 1) - 77.3% LMI
- Riverfront Crossings East (Tract 17, Block Group 3) - 77.2% LMI
- Wetherby (Tract 18.02, Block Group 2) - 75.5% LMI
- Pheasant Ridge (Tract 4, Block Group 2) - 67.7% LMI
- Saddlebrook (Tract 18.01, Block Group 2) - 67.0% LMI
- Northside/Mayflower/Shimek (Tract 1, Block Group 2) - 59.0% LMI
- Mark Twain West (Tract 17, Block Group 2) - 57.7% LMI
- Melrose/Emerald (Tract 5, Block Group 2) - 56.3% LMI
- Mark Twain East (Tract 17, Block Group 1) - 55.2% LMI
- Cole's (Tract 104, Block Group 4) - 54.2% LMI
- Pepperwood/Sandhill Estates (Tract 18.02, Block Group 1) - 53.4% LMI
- College Green (Tract 12, Block Group 2) - 52.5% LMI
- Court Hill/Lucas (Tract 14, Block Group 2) - 51.0% LMI

HUD also designates areas with concentrations of poverty as Qualified Census Tracts (QCT). A QCT is defined as any tract in which at least 50% of households have an income less than 60% AMI. In 2018, six tracts in Iowa City met this definition: the five Pentacrest tracts as well as Tract 4.

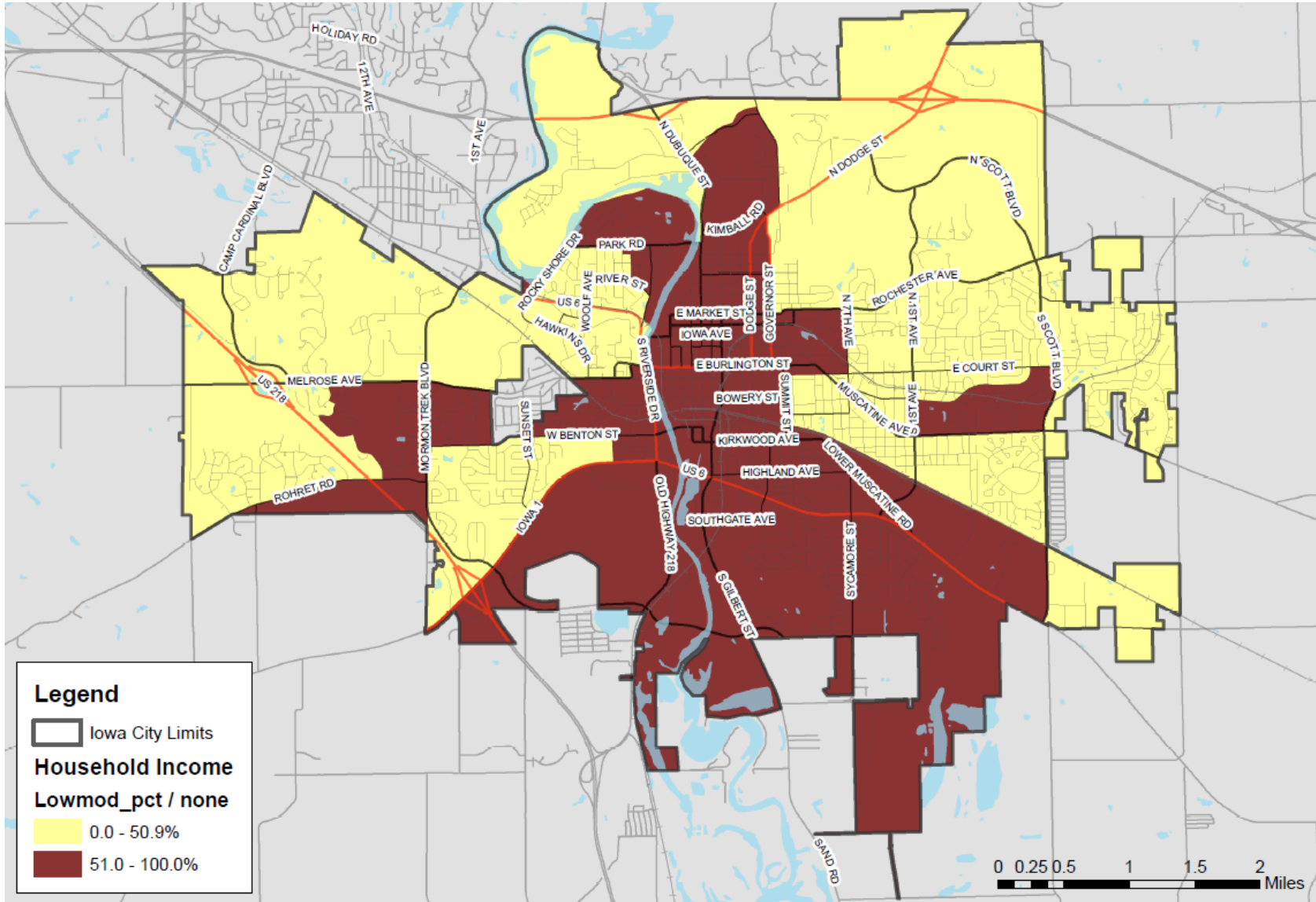
FIGURE 26: PERCENT OF LOW-MODERATE INCOME (LMI) PERSONS BY CENSUS TRACT - 2015

Census Tract	# LMI Persons	# Total Persons	% LMI
1 (part)	2,130	6,045	35.2%
4 (part)	3,180	7,000	45.4%
5 (part)	4,065	8,085	50.3%
6*	2,685	3,315	81.0%
11*	3,260	3,640	89.6%
12	780	1,890	41.3%
13	870	3,170	27.4%
14	2,145	4,695	45.7%
15	1,115	2,365	47.1%
16*	6,650	7,410	89.7%
17	2,015	3,075	65.5%
18.01 (part)	3,820	5,395	70.8%
18.02	2,530	3,875	65.3%
21*	1,405	1,520	92.4%
23*	1,170	2,245	52.1%
104 (part)	2,665	6,905	38.6%
105 (part)	2,575	6,480	39.7%

Source: U.S. Dept. of HUD

Note: An Asterisk indicates a Pentacrest Tract. Yellow means all block groups comprising a tract are LMI. Gray indicates that at least one block group within a tract is LMI. The map below shows all LMI areas by block group.

FIGURE 27: LMI AREAS BY BLOCK GROUP



Source: HUD LMI Data

Poverty

In 2017, 28% of the population (for whom poverty is determined) were living below the level of poverty, which was \$24,600 for a household of four. The Pentacrest tracts had the five highest rates of poverty in the City, which were significantly higher because of the large student population residing there. The lowest levels of poverty were found in Tracts 13, 14, 104, and 105. Generally, the poverty rate has increased since 2010.

Since a large student population exists in Iowa City, it is important to compare poverty rates by school enrollment. Looking at poverty rates for those not enrolled in undergraduate college, or in a graduate or professional, across the City reveals an age-adjusted poverty rate of 11.5%, still higher than in the county and state, but less dramatically skewed. This adjustment is rather large because 77% of undergraduate live in poverty while 44% of graduate and professional students live in poverty. Several tracts in Iowa City have age-adjusted poverty rates greater than the City's adjusted rate. These areas include four Pentacrest tracts (6, 11, 16, and 21), and four other tracts (4, 17, 18.01 and 18.02) which range between 12% and 18% of the population living in poverty.

In the Pentacrest tracts where student housing is most prevalent, the difference in poverty rates in those tracts between those of typical college age and the remainder of the population is notable. Poverty rates range from a difference of 41 percentage points in Tract 6 to 64 percentage points in Tract 23. For Iowa City as a whole, the difference between the college student poverty rate and the poverty rate for the rest of the population is 57 percentage points. Overall, these numbers demonstrate the strong influence that the student population has on poverty rates in Iowa City.

With regards to race, the black population has the highest poverty rate in Iowa City at 44%. This is followed by the Asian/Pacific Islander population at 43%, Other Race population (40%), and Hispanic population (29%). Only 25% of the white population live in poverty. For some groups, the Census does not report the number of households by race living below poverty because the number was too low to guarantee accuracy.

The highest percentage of nonwhite and Hispanic populations in poverty is found primarily in the Pentacrest tracts, as with the rest of the population. However, for nonwhite and Hispanic populations, 49% of those living in Tract 4, 39% in Tract 5, 34% in Tract 12, and between 30% and 33% of those living in Tracts 17, 18.01, and 18.02 were in poverty. Overall, 38% of nonwhite and Hispanic populations in Iowa City lived in poverty compared with 25% of the non-Hispanic white population.

FIGURE 28: POPULATION LIVING IN POVERTY BY RACE OF HOUSEHOLDER - 2017

Census Tract	All Households	Poverty Rate (for Whom Poverty Status is Determined) by Race						Householders of Hispanic Origin*
		White	Black	Native American *	Asian/Pacific Islander*	Other Race*	Persons of Two or More Races*	
1 (part)	10.3%	9.1%	27.5%	-	28.1%	0.0%	0.0%	0.6%
4 (part)	27.1%	13.3%	69.6%	100.0%	42.3%	0.0%	44.7%	11.2%
5 (part)	26.4%	21.2%	53.1%	0.0%	39.9%	0.0%	18.0%	29.7%
6	39.6%	35.0%	69.2%	50.0%	35.7%	61.1%	71.0%	52.3%
11	59.7%	58.9%	32.1%	-	93.9%	72.7%	31.0%	80.0%
12	13.2%	9.4%	100.0%	-	59.0%	33.3%	35.7%	9.4%
13	7.6%	6.0%	51.1%	0.0%	0.0%	0.0%	0.0%	0.0%
14 (part)	9.1%	5.8%	60.4%	0.0%	0.0%	0.0%	0.0%	0.0%
15	10.1%	9.5%	28.9%	0.0%	9.5%	0.0%	30.9%	0.0%
16	67.3%	71.6%	42.5%	-	80.8%	23.3%	21.9%	23.2%
17 (part)	22.9%	21.6%	38.9%	-	29.0%	-	0.0%	24.5%
18.01 (part)	16.8%	9.9%	18.6%	0.0%	31.0%	94.6%	0.0%	57.0%
18.02	18.8%	9.9%	34.5%	0.0%	12.7%	76.7%	12.9%	33.3%
21	69.5%	67.1%	100.0%	-	89.8%	100.0%	0.0%	80.2%
23	31.5%	26.9%	100.0%	-	47.8%	0.0%	47.2%	22.7%
104 (part)	6.4%	6.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
105 (part)	7.1%	6.0%	56.8%	-	47.4%	0.0%	0.0%	0.0%
Iowa City	28.0%	24.7%	44.2%	13.5%	43.3%	40.1%	22.4%	28.8%
Johnson County	17.7%	14.3%	38.0%	9.1%	34.9%	41.6%	14.8%	25.6%
Iowa	12.0%	10.5%	34.1%	28.1%	18.7%	22.4%	23.1%	22.7%

*Data for groups is not available for the geographic areas marked with "--" because the population of the selected race or ethnic group is less than the threshold.

Source: 2017 5-Year ACS

FIGURE 29: ESTIMATED POPULATION LIVING IN POVERTY BY ENROLLMENT STATUS - 2017

Census Tract	Poverty Rate (Population for Whom Poverty Status is Determined)		
	Total Population	Enrolled college or graduate school	Remainder of Population
1 (part)	10.3%	46.7%	5.1%
4 (part)	27.1%	69.5%	14.9%
5 (part)	26.4%	64.4%	11.4%
6	39.6%	59.8%	18.8%
11	59.7%	80.7%	16.9%
12	13.2%	49.9%	6.1%
13	7.6%	27.9%	5.7%
14 (part)	9.1%	38.3%	7.3%
15	10.1%	33.7%	7.9%
16	67.3%	82.3%	25.5%
17 (part)	22.9%	54.1%	17.2%
18.01 (part)	16.8%	38.3%	11.9%
18.02	18.8%	27.4%	18.1%
21	69.5%	82.5%	28.7%
23	31.5%	66.4%	2.4%
104 (part)	6.4%	6.1%	6.4%
105 (part)	7.1%	21.0%	5.1%
Iowa City	28.0%	68.6%	11.5%
Johnson County	17.7%	59.7%	8.1%
Iowa	12.0%	32.7%	10.4%

Source: 2017 5-Year ACS

Housing Profile

Understanding the City's housing profile is essential to understanding potential disproportionate impacts on protected classes. This section contains information about housing conditions in Iowa City, evaluates conditions for lower-income households, and divides it by protected class. If housing for households with lower incomes is in short supply, it should be the focus of the housing affordability strategy. Disparate impacts also explain how segregation and restricted housing supply occurred. This section thus describes the degree of segregation and restricted housing by race, ethnicity, disability status, and families with children.

Type of Housing

In 2017, there were 31,669 housing units in Iowa City. This number represents an increase of 3,101 dwelling units (11%) since 2010. Note that households exclude group quarters such as dorms. Of these units, 16,541 (52%) were single family attached or detached units. Multi-family housing units (with two or more units per structure) numbered 14,438 housing units (or 46% of all housing units). Iowa City also contains 690 mobile homes (2%). Iowa City has a greater percentage of housing units in multi-family structures than the county or the state. This pattern is consistent with an urban college town that is home to many student households.

Many multi-family dwelling units are located near the University and accommodate much of the student population. Within the Pentacrest tracts (6, 11, 16, 21, 23) specifically, 77% of units are multi-family. Outside of the Pentacrest tracts, tracts 4 and 5 had higher rates of multi-family housing than the City average. Despite recent multi-family housing developments, it has decreased as a percentage of housing units since comprising 48% of units in 2000 and 47% in 2010.

Noteworthy is the smaller concentration of mobile homes in Tracts 18.01 and 18.02, and much larger concentrations in Tracts 104 and 105. Two mobile parks are in Tract 104, and several others are in Tracts 18.01 and 18.02. Some tracts, such as 104 and 105, include land outside of the City, so some mobile home parks just outside of town are included in these numbers. The number of mobile homes in Iowa City has decreased over time, from 1,200 in 2000 to about 800 in 2010.

FIGURE 30: UNITS PER STRUCTURE BY CENSUS TRACT - 2017

	Total Units	Single family units (detached & attached)	Multi-family units				Total	Mobile home
			2 to 4	5 to 9	10 to 19	20 or more		
1 (part)	2,878	75.1%	3.8%	3.3%	11.7%	2.5%	21.2%	3.6%
4 (part)	3,280	53.1%	9.9%	10.4%	10.8%	15.3%	46.4%	0.5%
5 (part)	3,757	49.1%	6.0%	9.9%	22.7%	12.2%	50.9%	0.0%
6	1,992	22.3%	8.1%	14.0%	20.0%	35.6%	77.7%	0.0%
11	1,899	35.6%	18.9%	23.5%	17.3%	4.7%	64.4%	0.0%
12	961	74.3%	12.7%	2.4%	7.5%	3.1%	25.7%	0.0%
13	1,301	94.2%	2.2%	2.4%	0.5%	0.6%	5.8%	0.0%
14 (part)	2,164	80.9%	6.9%	5.5%	3.0%	3.7%	19.1%	0.0%
15	1,342	88.4%	9.1%	0.9%	1.3%	0.4%	11.6%	0.0%
16	3,668	13.2%	12.1%	23.1%	34.8%	16.7%	86.8%	0.0%
17 (part)	1,401	83.3%	5.0%	3.5%	3.3%	4.9%	16.7%	0.0%
18.01 (part)	2,315	52.2%	10.9%	6.6%	20.5%	0.0%	38.0%	9.8%
18.02	1,767	62.9%	9.4%	6.1%	13.3%	1.0%	29.8%	7.4%
21	950	5.4%	10.8%	15.6%	26.7%	41.5%	94.6%	0.0%
23	1,120	46.9%	4.6%	9.4%	21.4%	17.7%	53.1%	0.0%
104 (part)	2,646	59.2%	2.8%	3.2%	1.9%	1.9%	9.9%	30.9%
105 (part)	3,603	66.4%	3.2%	0.8%	9.2%	6.1%	19.3%	14.3%
Iowa City	31,669	52.2%	8.3%	10.0%	16.5%	10.8%	45.6%	2.2%
Johnson County	60,952	60.3%	7.1%	7.2%	12.8%	7.9%	35.0%	4.6%
Iowa	1,376,133	77.4%	5.7%	3.7%	3.9%	5.5%	18.9%	3.7%

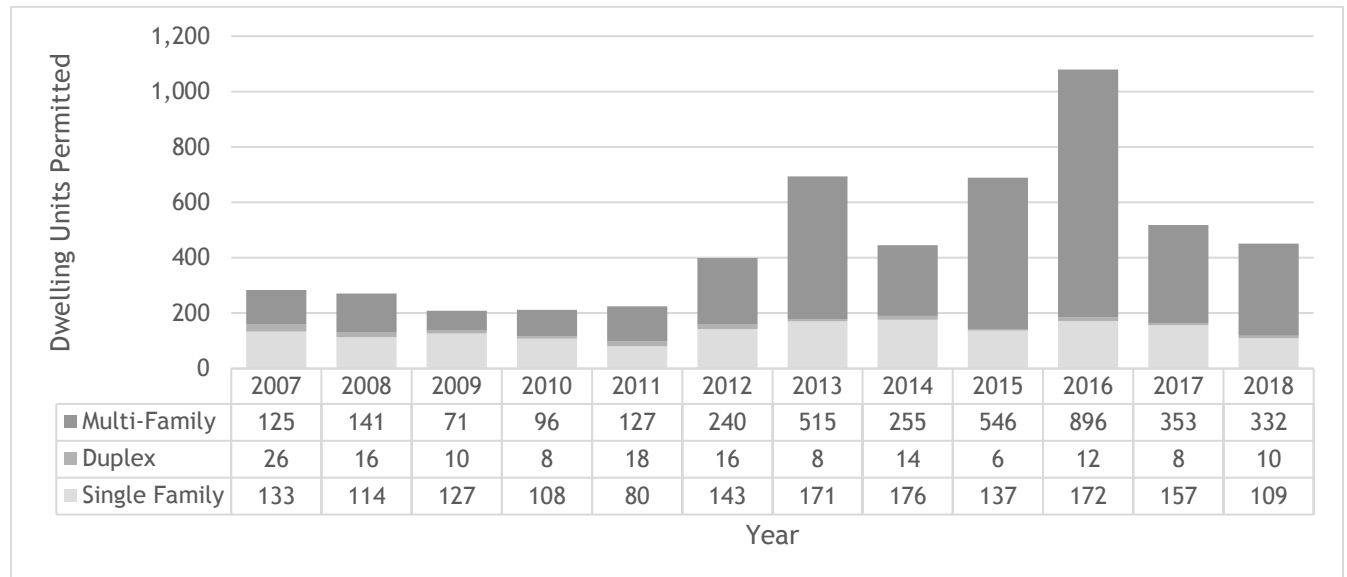
Source: U.S. Census Bureau, ACS 5-year 2017 Table DP04

New Development

Iowa City experienced a significant increase in residential development in the last decade in response to low vacancy rates, pent up demand for development, and upzoning. Per building permit data, the City averaged 240 new dwelling units per year from 2007 to 2011. From 2012 to 2018, the City averaged 611 units per year. The long-term average is 456 units per year, with 5,476 new units permitted in Iowa City over the past decade.

Generally, single family and duplex development has remained relatively stable. Recent increases in new construction has largely been due to an increase in multi-family projects, often in mixed use buildings. 2016 saw an especially large number of new units, more than doubling the long-term average; this is likely due to new construction and larger buildings allowed by the new Riverfront Crossings development code. Due to these trends, the proportion of single to multi-family units is likely to change in the future as buildings permitted in 2016 are completed.

FIGURE 31: ANNUAL BUILDING PERMIT STATISTICS BY NUMBER OF DWELLING UNITS



	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Total	284	271	208	212	225	399	694	445	689	1,080	518	451	5,476

Source: City of Iowa City Building Inspections Division

Overall Vacancy and Tenure

A housing unit is considered vacant if no one is living in it, unless its occupants are only temporarily absent. Vacancy rates vary upon market conditions, but 5% is generally considered market equilibrium, where a balance between supply and demand offers enough opportunities for household movement without having excess vacancies. There were 29,697 occupied housing units and 1,972 (6.2%) vacant units in Iowa City in 2017, lower than its vacancy rate of 6.8% in 2010. The current vacancy rate is higher than the County rate of 5.8%, but significantly less than the State rate of 9.1%. The City's rate is higher than typically preferred, but areas with greater household growth and construction often have higher vacancy rates due to new units being completed but not yet occupied.

The rental vacancy rate is the proportion of the rental inventory which is vacant for rent relative to the number of renter-occupied units. The homeowner vacancy rate is the proportion of the homeowner housing inventory which is vacant for sale relative to the number of owner-occupied units. Typically, owner vacancy rates are significantly lower than rental vacancy rates. In Iowa City, the homeowner vacancy rate is 1.4% while the rental vacancy rate is 2.7%. Because the homeowner and rental vacancy rates exclude vacant units that are unavailable for rent or sale, this suggests many of the vacant units in Iowa City are not currently available on the market. These rates indicate a relatively tight housing market for Iowa City.

Census Tracts 1, 11, 15, 16, 18, 21, and 23 had overall vacancy rates higher than the City rate. Many of these are in the Pentacrest tracts, so the high vacancy likely reflects the large increase in newly constructed units. This is corroborated by homeowner and rental vacancy rates which are significantly lower than their overall vacancy rates. The housing stock of the city has many options for owners and renters; it also has a higher proportion of rental units - given the large number of students - than most cities in the state.

FIGURE 32: HOUSING OCCUPANCY AND TENURE - 2017

	Total Units		Occupied Units				Vacant Units	
	#	Occupied #	Owner-occupied		Renter-occupied		#	%
			#	%	#	%		
1 (part)	2,878	2,568	1,992	77.6%	576	22.4%	310	10.8%
4 (part)	3,280	3,076	1,476	48.0%	1,600	52.0%	204	6.2%
5 (part)	3,757	3,618	1,679	46.4%	1,939	53.6%	139	3.7%
6	1,992	1,888	335	17.7%	1,553	82.3%	104	5.2%
11	1,899	1,764	308	17.5%	1,456	82.5%	135	7.1%
12	961	932	596	63.9%	336	36.1%	29	3.0%
13	1,301	1,289	1,139	88.4%	150	11.6%	12	0.9%
14 (part)	2,164	2,126	1,623	76.3%	503	23.7%	38	1.8%
15	1,342	1,209	826	68.3%	383	31.7%	133	9.9%
16	3,668	3,346	195	5.8%	3,151	94.2%	322	8.8%
17 (part)	1,401	1,332	823	61.8%	509	38.2%	69	4.9%
18.01 (part)	2,315	2,191	1,287	58.7%	904	41.3%	124	5.4%
18.02	1,767	1,659	844	50.9%	815	49.1%	108	6.1%
21	950	769	39	5.1%	730	94.9%	181	19.1%
23	1,120	1,034	398	38.5%	636	61.5%	86	7.7%
104 (part)	2,646	2,569	2,142	83.4%	427	16.6%	77	2.9%
105 (part)	3,603	3,492	2,517	72.1%	975	27.9%	111	3.1%
Iowa City	31,669	29,697	14,177	47.7%	15,520	52.3%	1,972	6.2%
Johnson County	60,952	57,423	34,032	59.3%	23,391	40.7%	3,529	5.8%
Iowa	1,376,133	1,251,587	889,285	71.1%	362,302	28.9%	124,546	9.1%

Source: U.S. Census Bureau, ACS 5-Year 2017, DP04

Owner Households

In 2017, 14,177 housing units were owner-occupied, making the homeownership rate in Iowa City 48%. The 2017 owner-occupied rate represented an increase from 45% in 1990 and 47% in 2000, though it decreased from 49% in 2010 and is substantially lower than the State at 71%. This lower rate is typical for college towns with large, transient student populations who rent dwelling units.

Non-Hispanic white households comprised 88% of all homeowner households in 2017. Meanwhile, homeowners of color comprised 12% of all homeowners, numbering more than 1,700. While the number of nonwhite/Hispanic owners increased by more than 400, this is far below their proportion across the City. Homeownership rates by race and ethnicity are as follows.

FIGURE 33: HOMEOWNERSHIP RATE BY RACE

	Total Households	Owner Households	Ownership Rate
Total	29,697	14,177	47.7%
Race of Householder			
White	24,611	12,804	52.0%
Black/African American	1,734	259	14.9%
Native American	63	23	36.5%
Asian/Pacific Islander	2,247	868	38.6%
Other Race	431	136	31.6%
Two or More Races	611	87	14.2%
Ethnicity of Householder			
Hispanic/Latino	1,179	506	42.9%
Non-Hispanic White	23,929	12,438	52.0%
Non-Hispanic Other Race	4,589	1,233	26.9%

Source: 2017 5-Year ACS

All groups have seen homeownership rates decrease since 2010 except for Native American, Asian/Pacific Islander, and Other non-Hispanic households. Overall, five tracts had Hispanic or nonwhite owner populations that were larger than the City's overall rate: Tracts 4, 5, 18.01, 81.02, and 21.

All households of color represent only a small percentage of homeowners in Iowa City. Some racial/ethnic groups have higher unemployment rates, which in combination with lower median household incomes, may contribute to lower rates of homeownership. Furthermore, student households comprise nearly a third of households of color in the City who may not be ready or interested in becoming homeowners at present.

Renter Households

The remaining 15,520 units (52%) were renter-occupied. Most rental occupancy is driven by the Pentacrest tracts, which have an overall rental occupancy of 86%. Outside of those areas, only Tract 5 had a higher rate of renters compared to the City at 54%.

Non-Hispanic white households comprised 74% of all renter households in 2017. Renter households of color numbered 4,029, occupying 26% of all rental units. This marked a decrease of 278 nonwhite and/or Hispanic renters since 2010 when they comprised only 31% of all renter households. The following conditions represent items of interest for racial and ethnic renters:

- Concentrations of black renter households existed in Tracts 14, 18.01, and 18.02. They also comprised a higher than average proportion in Tracts 13, 17, and 104. The highest was 32%.

- Concentrations of Asian and Pacific Islander renter households existed in Tracts 4 and 23. They also comprised a higher than average proportion in Tracts 5 and 6. The highest was 27%.
- No concentrations of Native American, other, or two or more race renter households existed. However, Native American renters comprised higher amounts in Tracts 5 and 6 with their highest percentage being 1%, other race renters comprised higher amounts in Tracts 15 and 18.01 with their highest percentage being 7%, and two or more race renters comprised higher amounts in Tracts 1 and 18.02 with their highest percentage being 7%.
- No concentrations Hispanic/Latinos renter households existed, though they comprised higher amounts in Tracts 13, 18.01 and 18.02 with their highest percentage being 13%.

Overall, five tracts had Hispanic or nonwhite renter populations that were larger than the City's overall rate: Tracts 4, 5, 18.01, 81.02, and 23.

FIGURE 34: OWNER-OCCUPANCY BY RACE/ETHNICITY OF HOUSEHOLD - 2017

	Total Occupied Units	Percent Owner-Occupied Units								
		Total	White	Black	Native American	Asian/Pacific Islander	Other Race	Two or More Races	Hispanic	Non-Hispanic White
1 (part)	2,568	77.6%	88.7%	1.0%	0.0%	6.1%	3.6%	0.7%	4.2%	88.1%
4 (part)	3,076	48.0%	75.1%	1.1%	0.0%	22.2%	0.0%	1.7%	0.0%	75.1%
5 (part)	3,618	46.4%	84.2%	3.2%	0.0%	12.6%	0.0%	0.0%	0.4%	83.8%
6	1,888	17.7%	94.0%	3.0%	0.0%	0.0%	0.0%	3.0%	0.0%	94.0%
11	1,764	17.5%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%
12	932	63.9%	97.0%	0.0%	0.0%	1.8%	0.0%	1.2%	0.8%	96.1%
13	1,289	88.4%	94.3%	0.0%	0.0%	4.0%	0.9%	0.9%	2.2%	92.1%
14 (part)	2,126	76.3%	94.6%	1.8%	0.8%	2.2%	0.5%	0.0%	1.3%	93.3%
15	1,209	68.3%	97.8%	1.1%	0.0%	1.1%	0.0%	0.0%	5.9%	91.9%
16	3,346	5.8%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%
17 (part)	1,332	61.8%	97.3%	2.1%	0.0%	0.0%	0.0%	0.6%	5.6%	92.3%
18.01 (part)	2,191	58.7%	89.1%	5.3%	0.8%	3.6%	1.2%	0.0%	5.7%	84.7%
18.02	1,659	50.9%	90.3%	2.3%	0.0%	3.8%	3.7%	0.0%	12.1%	81.9%
21	769	5.1%	79.5%	0.0%	0.0%	20.5%	0.0%	0.0%	0.0%	79.5%
23	1,034	38.5%	91.0%	0.0%	0.0%	4.8%	0.0%	4.3%	4.3%	91.0%
104 (part)	2,569	83.4%	97.5%	0.0%	0.0%	0.0%	2.4%	0.0%	4.7%	95.3%
105 (part)	3,492	72.1%	95.3%	0.6%	0.0%	2.4%	1.1%	0.6%	5.1%	91.3%
Iowa City	29,697	47.7%	90.3%	1.8%	0.2%	6.1%	1.0%	0.6%	3.6%	87.7%
Johnson County	57,423	59.3%	93.3%	1.3%	0.1%	4.1%	0.7%	0.5%	3.1%	90.9%
Iowa	1,251,587	71.1%	96.3%	1.1%	0.2%	1.3%	0.6%	0.6%	2.7%	94.3%

Source: U.S. Census Bureau, ACS 5-Year 2017, DP04

FIGURE 35: RENTER-OCCUPANCY BY RACE/ETHNICITY OF HOUSEHOLD - 2017

	Total Occupied Units	Percent Renter-Occupied Units								
		Total	White	Black	Native American	Asian/Pacific Islander	Other Race	Two or More Races	Hispanic	Non-Hispanic White
1 (part)	2,568	22.4%	86.6%	2.3%	0.0%	4.7%	0.0%	6.4%	0.0%	86.6%
4 (part)	3,076	52.0%	64.4%	11.2%	0.0%	19.3%	0.9%	4.3%	3.7%	61.6%
5 (part)	3,618	53.6%	68.9%	12.2%	1.1%	12.3%	1.1%	4.4%	7.1%	65.4%
6	1,888	82.3%	74.4%	3.9%	1.0%	15.6%	1.7%	3.4%	1.7%	74.4%
11	1,764	82.5%	92.6%	3.0%	0.0%	3.8%	0.0%	0.5%	1.4%	91.2%
12	932	36.1%	83.6%	5.4%	0.0%	3.3%	1.8%	6.0%	7.1%	78.3%
13	1,289	11.6%	86.0%	14.0%	0.0%	0.0%	0.0%	0.0%	11.3%	78.7%
14 (part)	2,126	23.7%	76.3%	23.7%	0.0%	0.0%	0.0%	0.0%	0.0%	76.3%
15	1,209	31.7%	79.9%	0.0%	0.0%	7.6%	7.0%	5.5%	7.0%	79.9%
16	3,346	94.2%	81.6%	4.9%	0.0%	7.0%	2.9%	3.6%	2.9%	81.6%
17 (part)	1,332	38.2%	81.1%	15.5%	0.0%	1.8%	0.0%	1.6%	2.0%	79.2%
18.01 (part)	2,191	41.3%	63.5%	27.7%	0.0%	2.0%	6.9%	0.0%	12.9%	57.4%
18.02	1,659	49.1%	52.5%	32.0%	0.7%	1.8%	5.6%	7.2%	10.6%	48.6%
21	769	94.9%	89.2%	0.0%	0.0%	7.0%	0.0%	3.8%	7.1%	82.1%
23	1,034	61.5%	70.0%	0.0%	0.0%	26.7%	0.0%	3.3%	2.4%	67.6%
104 (part)	2,569	16.6%	79.2%	15.2%	0.5%	4.7%	0.0%	0.5%	0.2%	78.9%
105 (part)	3,492	27.9%	95.6%	0.0%	0.0%	0.0%	4.4%	0.0%	8.9%	91.1%
Iowa City	29,697	52.3%	76.1%	9.5%	0.3%	8.9%	1.9%	3.4%	4.3%	74.0%
Johnson County	57,423	40.7%	76.5%	10.4%	0.2%	8.4%	2.0%	2.5%	4.7%	74.2%
Iowa	1,251,587	28.9%	85.5%	7.1%	0.6%	3.3%	1.6%	1.9%	6.3%	81.1%

Source: U.S. Census Bureau, ACS 5-Year 2017, DP04

Value and Rent

House values have steadily increased since 2010. The median value of owner-occupied housing in 2017 in the City was \$202,200, slightly lower than the county but 147% higher than the State. Since 2010, median value increased 15% from \$176,600 in 2010, not adjusting for inflation. This increase in housing value was slightly higher than the increase in median household income (13%). Adjusting for inflation, that is an increase of only 2% during the same period.

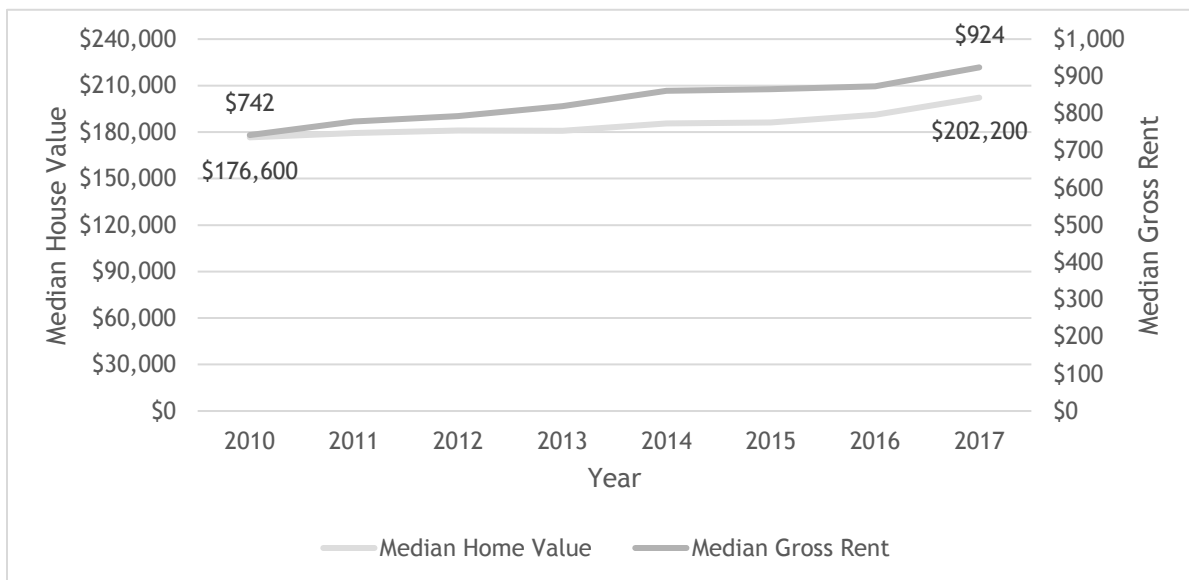
Median housing values ranged from \$128,700 in Tract 18.01 to \$495,800 in Tract 21 (possibly due to a small sample size; the next highest was \$405,400 in tract 23). Outside of the Pentacrest tracts, several tracts (14, 15, 17, 18.01, 18.02, 104, and 105) had median housing values lower than the City median. Notably, the Pentacrest tracts had some of the largest percent increases in value.

Rents have also increased since 2010, and at a faster pace than house values. In 2017, the median gross rent was \$924 (which includes utility costs). Since 2010, this figure has risen 25% from \$742, not adjusting for inflation. Adjusting for inflation, this remains a significant increase of 12.4%. The median gross rent in Iowa City was similar to the County but significantly higher than the State overall due to the presence of a strong rental housing market for student households.

As with housing value, gross rent varied greatly across the City. Median rents ranged from \$735 in Tract 104 to \$1,347 in Tract 17. Outside of the Pentacrest tracts, only six (5, 13, 18.01, 18.02, 104 and 105) had median gross rents lower than the City median. Generally, areas outside the Pentacrest tracts saw the highest percent increases in gross rent since 2010, especially Tracts 4, 14, and 17.

The following chart and table outlines change in median gross rent and median housing value over time and across the City.

FIGURE 36: MEDIAN HOUSING VALUES AND GROSS RENTS IN IOWA CITY, 2010 - 2017



Source: American Community Survey 5-year 2010 - 2017; not adjusted for inflation

FIGURE 37: MEDIAN HOUSING VALUES AND GROSS RENTS IN IOWA CITY BY CENSUS TRACT, 2010 - 2017

Census Tract	Median Housing Value			Median Gross Rent		
	2010	2017	2010-2017 % Change	2010	2017	2010-2017 % Change
1 (part)	\$219,600	\$242,700	10.5%	\$825	\$1,145	38.8%
4 (part)	\$262,200	\$291,100	11.0%	\$583	\$924	58.5%
5 (part)	\$196,300	\$233,600	19.0%	\$720	\$885	22.9%
6	\$142,500	\$193,300	35.6%	\$680	\$828	21.8%
11	\$183,700	\$254,400	38.5%	\$902	\$976	8.2%
12	\$195,200	\$223,800	14.7%	\$879	\$1,027	16.8%
13	\$186,400	\$216,100	15.9%	\$809	\$839	3.7%
14 (part)	\$166,300	\$182,400	9.7%	\$610	\$959	57.2%
15	\$160,700	\$171,300	6.6%	\$925	\$965	4.3%
16	\$177,500	\$219,300	23.5%	\$932	\$992	6.4%
17 (part)	\$135,900	\$154,300	13.5%	\$837	\$1,347	60.9%
18.01 (part)	\$126,000	\$128,700	2.1%	\$710	\$913	28.6%
18.02	\$175,600	\$177,300	1.0%	\$699	\$866	23.9%
21	\$412,500	\$495,800	20.2%	\$934	\$1,046	12.0%
23	\$338,900	\$405,400	19.6%	\$833	\$980	17.6%
104 (part)	\$142,100	\$161,200	13.4%	\$548	\$735	34.1%
105 (part)	\$153,800	\$195,200	26.9%	\$758	\$886	16.9%
Iowa City	\$176,600	\$202,200	14.5%	\$742	\$924	24.5%
Johnson County	\$177,000	\$210,400	18.9%	\$735	\$929	26.4%
Iowa	\$119,200	\$137,200	15.1%	\$617	\$740	19.9%

Source: U.S. Census Bureau, ACS 5-year 2010 and 2017 Table DP04; not adjusted for inflation

Housing Needs

HUD uses identifies the number of households in need of housing assistance by using four indicators to track certain housing problems within a community. These variables provide insight into certain issues that can cause housing units to become substandard. The first affects the ability of households to maintain their property over time. The other three variables act as direct indicators of physical housing quality. These housing needs are:

- **Cost Burden and Severe Cost Burden.** Cost burden is the fraction of a household's total gross income spent on housing costs. There are two levels: 1) "Cost Burden" counts the households for which housing cost is greater than 30% of their income; and 2) "Severe Cost Burden" counts the number of households paying 50% or more of their income for housing. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities.
- **Overcrowding.** Overcrowding is directly related to the wear and tear sustained by a housing unit. Households having more than 1.01 to 1.5 persons per room are considered overcrowded and those having more than 1.51 persons per room are considered severely overcrowded. The person per room analysis excludes bathrooms, porches, foyers, halls, or half-rooms
- **Substandard Housing.** Units without complete plumbing facilities generally indicate substandard housing conditions. There are two types of substandard housing problems: Households without hot and cold piped water, a flush toilet, and a bathtub or shower; and Households with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator.
- **Age of Housing.** Age of a structure is used to demonstrate the amount of time a unit has been in the housing inventory. Older housing requires continual maintenance. In the absence of routine maintenance, older housing becomes substandard. The age threshold used to signal a *potential* deficiency is that which was built before 1970 (approximately 50 years).

Disproportionate housing needs are a condition in which there are significant disparities in members of a protected class experiencing a category of housing needs when compared to the total population. This analysis promotes an important component of fair housing planning: to assess if any groups of persons, based on a protected characteristic, experience greater housing needs when compared to other populations in the jurisdiction and region. This assessment is necessary to set goals and priorities and to develop strategies to address barriers to fair housing choice.

Housing Cost burden

Housing is considered affordable if a household pays no more than 30% of their gross income for monthly housing expenses including rent, mortgage, utilities, insurance, and taxes, regardless of income level. Households paying more than 30% are considered housing cost burdened. Cost burdened households may be forced to sacrifice other necessities such as food, clothing, transportation, and health care, in exchange for housing costs. Additionally, cost burdened households may have trouble maintaining their dwelling. When households spend more than 50% of gross income on housing, a household is considered extremely cost burdened. Some households choose to pay more than 30% of their income for housing. Depending on a household's circumstances, this may not pose a problem. However, cost burden is of particular concern among lower income households, who overall have fewer housing choices.

In 2017, there were 2,218 owner households (16%) who were housing cost burdened. When removing households where the householder was younger than 25 years (a proxy for college student households), 15% of owner households were still cost burdened. 10 out of 17 tracts had owner housing cost burden rates that were higher than the City's total rate. This level of cost burden is slightly lower than that of the State.

Another 9,151 renter households (64%) were housing cost burdened. When removing households where the householder was younger than 25 years, more than half (51%) of renter households were still cost burdened. In addition to three Pentacrest tracts, only Tracts 12 and 17 had a greater proportion of housing cost burdened renters than the City overall. More than half of renter households in 10 tracts were cost burdened. This level of cost burden is notably higher than both the State and County.

This problem has increased for renters, though it has decreased for owners. In 2010, 23% of owners and 65% of renters were housing cost-burdened. Overall, 44% of the households in Iowa City were cost-burdened in 2010. In 2017, 40% of Iowa City households were housing cost-burdened overall. The five Pentacrest tracts, in addition to Tracts 5 and 17, were at or above that level. When excluding households with the householder older than 25, 29% of households are still cost burdened.

This speaks to challenges with the affordability of housing in Iowa City, especially in high-demand areas near downtown and the University, where students may be supported by parents or use debt to pay for housing rather than income. Four out of the five top barriers to fair housing choice identified on the survey were related to not enough affordable housing for a range of household types, including individuals and large and small families. Displacement due to rising housing costs was also noted.

HUD data also sheds light on to which households are severely housing cost-burdened. This data is not perfectly aligned with Census data but still provides valuable insight. In Iowa City, Other non-Hispanic households are more severely cost-burdened, as are white non-Hispanic households. This contrasts the characteristics of the region where there is less severe housing cost-burden, and non-Hispanic black, Asian/Pacific Islander, and other households tend to be the most severely housing cost-burdened. Family households, both large and small, are the least likely to be severely housing cost-burdened, which could be due to having one or more wage earners. Meanwhile, 36% of nonfamily households in the City and 26% in the region are severely housing cost-burdened. This supports that students, especially student renters, are among the most impacted by the high housing costs in Iowa City.

FIGURE 38: COST-BURDENED OWNER AND RENTER HOUSEHOLDS - 2017

	Total Owner Households	Owners paying 30% or more on monthly housing costs		Total Renter Households	Renters paying 30% or more on monthly housing costs	
	#	#	%	#	#	%
1 (part)	1,964	412	9.6%	549	271	49.4%
4 (part)	1,410	927	10.1%	1,416	785	55.4%
5 (part)	1,657	1,312	23.2%	1,771	1,064	60.1%
6	324	909	14.8%	1,506	872	57.9%
11	308	1,156	24.7%	1,312	1,082	82.5%
12	596	262	10.7%	318	205	64.5%
13	1,139	181	12.3%	143	67	46.9%
14 (part)	1,623	450	16.0%	472	217	46.0%
15	826	271	18.3%	358	159	44.4%
16	195	2,166	3.6%	2,815	2,166	76.9%
17 (part)	823	515	23.7%	473	338	71.5%
18.01 (part)	1,287	546	16.2%	892	388	43.5%
18.02	844	605	20.3%	728	456	62.6%
21	31	474	58.1%	652	456	69.9%
23	398	381	17.6%	571	320	56.0%
104 (part)	2,142	197	16.6%	341	47	13.8%
105 (part)	2,513	846	16.2%	856	554	64.7%
Iowa City	14,048	10,949	15.8%	14,267	9,151	64.1%
Johnson County	33,836	16,715	15.8%	21,532	12,280	57.0%
Iowa	884,202	253,612	16.6%	332,075	145,207	43.7%

Source: U.S. Census Bureau, ACS 5-year 2017, DP04, note cost-burden figures are not computed for all households

FIGURE 39: DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST-BURDEN

Race/Ethnicity	Iowa City			Iowa City Region		
	severe cost-burden	Total households	% severe cost-burden	severe cost-burden	Total households	% severe cost-burden
White, Non-Hispanic	6,055	23,570	25.7%	8,520	54,954	15.5%
Black, Non-Hispanic	360	1,519	23.7%	480	2,267	21.2%
Hispanic	225	1,145	19.7%	309	2,413	12.8%
Asian/Pacific Islander, Non-Hispanic	400	1,605	24.9%	520	2,575	20.2%
Native American, Non-Hispanic	0	86	0.0%	15	142	10.6%
Other, Non-Hispanic	120	379	31.7%	134	626	21.4%
Total	7,160	28,275	25.3%	9,978	62,955	15.9%
Household Type and Size						
Family households, <5 people	1,300	11,154	11.7%	2,218	30,548	7.3%
Family households, 5+ people	125	1,245	10.0%	397	4,550	8.7%
Non-family households	5,734	15,880	36.1%	7,361	27,860	26.4%

Source: CHAS

Note: Severe housing cost-burden is defined as greater than 50% of income. All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. # households is the denominator for the % with problems and may differ from the # households for the table on severe housing problems. Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Overcrowding and Substandard Units

In 2017, only 174 owner-occupied housing units (1%) with more than one person per room. A plurality of these units was either located in Census Tracts 18.02 or 104. In addition, 0.1% of owner-occupied units (15 units), lacked complete plumbing facilities.

The rate among rental units was higher at 2% (318 units). More overcrowded rental units were found in Tracts 1, 4, 18.02, and 104 than elsewhere in the City. Tract 4 contained 95 of the total 318 overcrowded rental units in the City. Approximately 1% of rental units were substandard, the majority of which was in Tract 11.

Generally, the number of substandard units is low due to the City's regular rental inspections and occupancy regulations. The number of substandard and overcrowded units has decreased over time, suggesting that efforts to address these issues have been successful.

Age of Housing

In 2017, 367% of owner-occupied units (5,190) and 35% of renter-occupied units (5,417) were built before 1970. Tracts 6, 11, 12, 15, 16, 17, and 23 tended to have the highest number of older homes, of which more than 70% of the owner-occupied housing stock was built before 1970. Meanwhile, older rental areas include Tracts 11, 12, 15, and 14, the majority of which were built prior to 1970.

The City's owner-occupied housing stock is marginally younger than the County's and much younger than the State's. However, the City's rental housing stock is slightly older than the County's, though still younger than the state. This is largely due to new construction which has occurred consistently in Iowa City. It suggests that investment may only be needed in certain, older parts of the City.

Disproportionate Housing Needs

The areas with the greatest housing burden are downtown, followed by adjacent areas to the south and the far west side. These include some areas with higher concentrations of persons of color, and as a result, more than half of non-Hispanic Native American, other, and black households are most likely to experience one of these four housing problems. Similarly, more than half of nonfamily households also experience housing problems. Areas to the east have the lowest levels of housing problems. Generally, Iowa City residents are more likely to experience problems than the wider region. Households of color are also more likely to experience severe housing problems.

FIGURE 40: HOUSING QUALITY INDICATORS AMONG OWNER-OCCUPIED UNITS - 2017

	Owner- occupied Units	Built Before 1970		Units Lacking Complete Facilities		Overcrowded Units	
	#	#	%	#	#	#	%
1 (part)	1,992	725	36.4%	15	1,992	725	36.4%
4 (part)	1,476	15	1.0%	0	1,476	15	1.0%
5 (part)	1,679	426	25.4%	0	1,679	426	25.4%
6	335	243	72.5%	0	335	243	72.5%
11	308	308	100.0%	0	308	308	100.0%
12	596	461	77.3%	0	596	461	77.3%
13	1,139	387	34.0%	0	1,139	387	34.0%
14 (part)	1,623	528	32.5%	0	1,623	528	32.5%
15	826	801	97.0%	0	826	801	97.0%
16	195	154	79.0%	0	195	154	79.0%
17 (part)	823	744	90.4%	0	823	744	90.4%
18.01 (part)	1,287	231	17.9%	0	1,287	231	17.9%
18.02	844	123	14.6%	0	844	123	14.6%
21	39	0	0.0%	0	39	0	0.0%
23	398	324	81.4%	0	398	324	81.4%
104 (part)	2,142	637	29.7%	0	2,142	637	29.7%
105 (part)	2,517	442	17.6%	0	2,517	442	17.6%
Iowa City	14,177	5,190	36.6%	15	14,177	5,190	36.6%
Johnson County	34,032	9,265	27.2%	27	34,032	9,265	27.2%
Iowa	889,285	468,666	52.7%	2,327	889,285	468,666	52.7%

FIGURE 41: HOUSING QUALITY INDICATORS AMONG RENTER-OCCUPIED UNITS - 2017

	Renter- occupied Units	Built Before 1970		Units Lacking Complete Facilities		Overcrowded Units	
	#	#	%	#	%	#	%
1 (part)	576	261	45.3%	0	0.0%	37	6.4%
4 (part)	1,600	427	26.7%	0	0.0%	95	5.9%
5 (part)	1,939	337	17.4%	0	0.0%	20	1.0%
6	1,553	593	38.2%	35	2.3%	37	2.4%
11	1,456	972	66.8%	98	6.7%	11	0.8%
12	336	228	67.9%	23	6.8%	0	0.0%
13	150	27	18.0%	0	0.0%	0	0.0%
14 (part)	503	243	48.3%	0	0.0%	0	0.0%
15	383	223	58.2%	0	0.0%	0	0.0%
16	3,151	999	31.7%	0	0.0%	6	0.2%
17 (part)	509	267	52.5%	0	0.0%	14	2.8%
18.01 (part)	904	268	29.6%	0	0.0%	20	2.2%
18.02	815	231	28.3%	0	0.0%	83	10.2%
21	730	251	34.4%	0	0.0%	18	2.5%
23	636	265	41.7%	0	0.0%	0	0.0%
104 (part)	427	222	52.0%	0	0.0%	69	16.2%
105 (part)	975	288	29.5%	5	0.5%	0	0.0%
Iowa City	15,520	5,417	34.9%	156	1.0%	318	2.0%
Johnson County	23,391	7,085	30.3%	185	0.8%	822	3.5%
Iowa	362,302	173,642	47.9%	1,421	0.4%	11,654	3.2%

Source: U.S. Census Bureau, Census 2000, Summary File 3 (H20, H36, H48)

FIGURE 42: DEMOGRAPHICS OF HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS

	Iowa City, IA			Iowa City Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	9,670	23,570	41.0%	16,764	54,954	30.5%
Black, Non-Hispanic	909	1,519	59.8%	1,198	2,267	52.9%
Hispanic	485	1,145	42.4%	1,054	2,413	43.7%
Asian or Pacific Islander, Non-Hispanic	690	1,605	43.0%	945	2,575	36.7%
Native American, Non-Hispanic	60	86	69.8%	80	142	56.3%
Other, Non-Hispanic	235	379	62.0%	273	626	43.6%
Total	12,040	28,275	42.6%	20,310	62,955	32.3%
Household Type and Size						
Family households, <5 people	2,930	11,154	26.3%	5,920	30,548	19.4%
Family households, 5+ people	535	1,245	43.0%	1,735	4,550	38.1%
Non-family households	8,575	15,880	54.0%	12,660	27,860	45.4%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	6,360	23,570	27.0%	9,220	54,954	16.8%
Black, Non-Hispanic	449	1,519	29.6%	625	2,267	27.6%
Hispanic	340	1,145	29.7%	668	2,413	27.7%
Asian or Pacific Islander, Non-Hispanic	480	1,605	29.9%	634	2,575	24.6%
Native American, Non-Hispanic	0	86	0.0%	15	142	10.6%
Other, Non-Hispanic	120	379	31.7%	138	626	22.0%
Total	7,745	28,275	27.4%	11,290	62,955	17.9%

Sources: CHAS

Notes: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost-burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost-burden greater than 50%. All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Iowa City Profile Summary

With the substantial amount of data presented in this section, it is beneficial to summarize it in a more concise format. The matrix on the following page lists the tracts in the City at the top of the chart. In the left column, demographic, economic, and housing characteristics are listed. Where the characteristic is greater than the City rate, the cell is checked. Where an area of racial or ethnic concentration has been identified, the cell is shaded.

The purpose of the matrix is to identify patterns of potential impediments to fair housing choice among the census tracts in Iowa City. From the matrix, the following conclusions can be stated:

- Many characteristics associated with lower income households (such as high poverty, high rates of LMI persons, lower median housing values, lower rents, overcrowded rental units and cost-burdened renter households) are found in the Pentacrest tracts (6, 11, 16, 21 and 23). These conditions are typical in areas surrounding a large university that have a substantial transient student renter population, though this does not discount their importance.
- When these demographic characteristics are found outside of the Pentacrest tracts, they may indicate potential impediments to fair housing choice if they occur in areas of racial or ethnic concentration. Tracts 4, 18.02, and 23 all met the definition of areas of racial/ethnic concentrations where the tract rate of a racial or ethnic group was 10 percentage points or more than the City rate. In the case of Tracts 4 and 18.02, these tracts also had higher rates of families with children, foreign born residents, persons with disabilities, renters of color, and overcrowded rental units. Tract 18.02 also exhibited more LMI persons, female-headed households, overcrowded owner units, and cost-burdened owners. Tract 23 stands out as a Pentacrest Tract, only exhibiting higher rates of poverty, older housing units, and cost-burdened owners. Overall, this suggests that 18.02 greatest reflecting possible barriers to fair housing choice.
- Tracts 17 and 18.01 also had some characteristics present that may indicate potential impediments to fair housing choice. Particularly, the higher rates of families with children, female-headed households, and persons with disabilities are coupled with higher rates LMI persons and overcrowding which may be a result of barriers to fair housing choice.

Figure 43: Matrix of Iowa City Characteristics by Tract

Demographic Characteristics	Census Tracts																
	1	4	5	6	11	12	13	14	15	16	17	18.01	18.02	21	23	104	105
Families with Children	X	X	X			X	X	X	X		X	X	X			X	X
Female-headed Households				X			X	X	X		X	X	X				X
Racial Concentration (by Households)																	
Ethnic Concentration (by Households)																	
Foreign born Residents		X	X	X								X	X				
Persons with Disabilities		X					X	X	X		X	X	X			X	X
Poverty				X	X					X				X	X		
Low-Moderate Income Persons				X	X					X	X	X	X	X			
Black Renters		X	X				X	X			X	X	X			X	
AIAN Renters			X	X									X			X	
Asian/PI Renters		X	X	X											X		
Other Race Renters									X	X		X	X				X
Two or More Race Renters	X	X	X			X			X	X			X	X			
Hispanic Renters			X			X	X		X			X	X	X			X
Median Housing Value	X	X	X		X	X	X			X				X	X		
Gross Median Rent	X				X	X		X	X	X	X			X	X		
Older Owner Units					X	X			X	X	X				X		
Owner Units Lacking Plumbing	X																
Owner Units Overcrowded	X										X	X	X			X	
Older Renter Units	X			X	X	X		X	X		X				X	X	
Renter Units Lacking Plumbing				X	X	X											
Renter Units Overcrowded	X	X		X							X	X	X	X		X	
Cost-burdened Owners			X		X			X	X			X	X	X	X	X	X
Cost-burdened Renters					X	X				X	X			X			X

Chapter 3: Fair Housing in Iowa City

This section analyzes the City's past and current fair housing enforcement, planning initiatives, outreach capacity, and resources. Fair housing enforcement and outreach capacity is the ability of the City, and organizations within its boundaries, to accept complaints of violations of fair housing laws, investigate such complaints, obtain remedies, engage in fair housing testing, and educate community members about fair housing laws and rights. This section also analyzes fair housing complaints or compliance reviews, identifies trends and concerns, reviews actions, and concludes with a discussion of trends, patterns, and concerns.

Fair Housing Enforcement

Effective fair housing enforcement lies at the heart of a comprehensive program to affirmatively further fair housing. The structure of this program varies among communities based on size and resources as cities must determine the most suitable program for themselves. To assure good standing for HUD, Iowa City strives to address any and all concerns expressed by HUD that relate to fair housing and equal opportunity performance and to comply with all applicable laws and regulations governing its programs. Concerns include any and all court decisions relating to fair housing and other civil rights laws to which the City is subject. Currently there are none.

The basis for fair housing enforcement in Iowa City is Title 2 of the City Code (and by extension, state and federal fair housing laws). Iowa City defines protected classes in a broader and more inclusive way than both state and federal definitions. Chapter 3 of the code contains the explicit guidelines banning discriminatory practices in housing. Taken together, the guidelines and definition of protected classes demonstrate that the City's stringent regulations ensure discriminatory practices do not impede fair housing choice.

Iowa City's Code prohibits discrimination in employment, credit, public accommodation and education on the basis of race, creed, color, religion, national origin, age, sex, marital status, disability, sexual orientation or gender identity. In addition, discrimination in housing is prohibited based upon the additional protected classes of familial status, presence or absence of dependents, and public source of income (including rental subsidies which was added in 2016). It is also unlawful to retaliate against a person because such person has lawfully opposed any discriminatory practice.

Discriminatory practices for housing based on any protected characteristic in the Human Rights Ordinance include:

- To refuse to sell, rent, lease, assign, sublease, refuse to negotiate or to otherwise make unavailable, or deny any real property or dwelling or part, portion or interest therein;
- To discriminate against any other person in the terms, conditions or privileges of any real estate transaction;
- To directly or indirectly advertise, or in any other manner indicate or publicize in any real estate transaction that any person is not welcome or not solicited;
- To discriminate against the lessee or purchaser of any real property or dwelling or part, portion or interest of the real property or dwelling, or against any prospective lessee or purchaser of the property or dwelling for persons who may from time to time be present in or on the lessee's or owner's premises for lawful purposes at the invitation of the lessee or owner as friends, guests, visitors, relatives or in any similar capacity.
- To induce or attempt to induce another person to sell or rent a dwelling by representations regarding the entry or prospective entry into a neighborhood of a protected class;
- To represent to a protected class that a dwelling is not available for inspection, sale or rental when the dwelling is available for inspection, sale or rental;
- To intentionally aid, abet, compel or coerce another person to engage in any of the practices declared unfair or discriminatory;
- To discriminate against another person because such person has either lawfully opposed any discriminatory practice forbidden by this title, obeyed the provisions of this title, or has filed a complaint, testified, or assisted in any proceeding; and
- To coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, or on account of having exercised, enjoyed, aided, or encouraged any other person in the exercise or enjoyment of any right granted or protection under the City's ordinance.

Additional prohibited discriminatory practices regarding persons with disabilities include:

- To discriminate in the sale or rental or otherwise make unavailable or deny a dwelling to a buyer or renter because of a disability of any of that buyer or renter, a person residing in or intending to reside in that dwelling after it is sold, rented or made available, or a person associated with that buyer or renter;
- To discriminate against another person in the terms, conditions or privileges of sale or rental of a dwelling or in the provision of services or facilities in connection with the dwelling because of a disability of any of that person, a person residing in or intending to reside in that dwelling after it is sold, rented or made available, or a person associated with that person. This does not require that a dwelling be made available to a person whose tenancy would constitute a direct threat to the health or safety of other persons or whose tenancy would result in substantial physical damage to the property of others. Discrimination includes any of the following circumstances:
 - At the expense of the person, a refusal to permit reasonable modifications of existing premises occupied or to be occupied by the person if the modifications are necessary to afford the person full enjoyment of the premises. In the case of a rental, a landlord may, where reasonable to do so, condition permission for a modification on the renter's agreement to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear excepted.
 - A refusal to make reasonable accommodations in rules, policies, practices or services, when the accommodations are necessary to afford the person equal opportunity to use and enjoy a dwelling.
 - A failure to design and construct certain multi-family dwellings in a manner that meets specific accessibility requirements as listed in the code.

Actual enforcement of fair housing policies and protections within Iowa City are conducted by the Office of Equity and Human Rights (EHR).

Iowa City Human Rights Commission

Founded in 1963, the Human Rights Commission (HRC) is the local agency responsible for enforcing local anti-discrimination laws as well as for increasing awareness about discriminatory practices and how to combat them. The HRC receives its authority from Title 2, Chapter 2 of the Iowa City City Code. The general responsibilities of the HRC include:

- Making recommendations to the Council for such further legislation concerning discrimination as it may deem necessary and desirable;
- Cooperating with other agencies or organizations, both public and private, whose purposes are consistent with those of the Human Rights Ordinance;
- Educating the public on human rights and illegal discrimination, such as organizing and facilitating educational public forums that address one or more of the broad range of topics included within the rubric of human rights; and
- Coordinating programs designed to eliminate racial, religious, cultural and other intergroup tensions.

The HRC is comprised of nine members appointed by City Council. Each member serves a three-year term. The Commissioners, all committed to civil rights, reflect a broad cross-section of the community, thus ensuring diversity of ideas and interests. In the appointment process, consideration is given to racial, religious, cultural, social and economic groups within the City. HRC holds monthly meetings that are open to the public and conducts special meetings as needed.

HRC accepts complaints related to employment, education, credit, and public accommodation on one of 12 factors, and related to housing on one of 15 factors reflecting the protected classes discussed earlier. Since 2012, HRC staff processed between 40 to 45 complaints each year, most of which tend to involve employment issues, and has processed hundreds of complaints of discrimination since its inception. Public accommodation is the second most common complaint, while housing is approximately 22% of submittals. Between 2012 and 2018, housing complaints filed with the HRC has been relatively stable other than sudden drops in 2014 and 2015. Complaints are discussed later in this Chapter. HRC is assisted by City staff who serve as an impartial third party to investigate complaints alleging discrimination in housing, education, employment, credit and public accommodation.

In 2017, City Council approved \$25,000 for a new grant entitled the Social Justice and Racial Equity Grant which has six priority service areas: Education, Building Community, Housing, Criminal Justice, Health, and Employment. HRC reviews applications then forwards its recommendations to the Council for review and approval. In 2019, Council approved \$75,000 for the grant. The HRC also receives \$2,000 annually for outreach for community event funding.

Iowa City Office of Equity and Human Rights

The Office of Equity and Human Rights (EHR) investigate complaints, coordinate mediation, conduct conciliation, and enforce the provisions of the Iowa City Human Rights Ordinance and, by extension, the provisions of state and federal-level anti-discrimination laws. Staff, including one Human Rights Coordinator and one Human Rights Investigator, work closely with the appointed resident members of the HRC. They also assist persons who feel that they have been victimized by discrimination.

Staff first identify the area of discrimination (housing, employment, education, credit or public accommodation). They then determine the basis for the complaint (age, color, creed, disability, gender identity, marital status, national origin, race, religion, sex or sexual orientation). Once a complaint is filed, the HRC investigates the allegations to determine whether there is probable cause to believe that discrimination occurred. The Commission staff may attempt to conciliate an agreement between the parties involved in the complaint, provided that both parties agree to mediation. A variety of enforcement tools helps ensure fair housing in addition to investigating complaints, including:

- Fielding calls from the public concerning fair housing
- Assisting walk-ins inquiring about fair housing
- Monitoring Craig's List and social media sites for unlawful advertisements
- Assisting with fair housing elements of the City's CAPER and Consolidated Plan
- Offering mediation to the Complainant and Respondent in fair housing complaints
- Addressing fair housing concerns in response to inquiries from the public and then based on the outcome, informing all parties about fair housing laws and offering needed materials or training
- Monitoring advertisements in the local newspapers for unlawful advertisements

The City conducts some fair housing testing. The most recent being in 2015 and lead by John Marshall's Fair Housing Legal Support Center & Clinic. In certain cases, the City sends letters to a party alleged to have discriminated, reminding them of the City's law and the potential consequences for violating the law. The City also conducts outreach and education for fair housing issues.

The EHR has staff with trained in law who support the HRC, enforce the Human Rights ordinance, educate the public and others on fair housing, and further civil rights initiatives. The budget for EHR increased from \$235,530 in Fiscal Year 2013 to \$449,740 in FY19. This budget is expected to remain relatively stable.

Iowa Civil Rights Commission

The Iowa Civil Rights Commission (ICRC) is a neutral, fact-finding law enforcement agency. The mission of the ICRC is to end discrimination within the State of Iowa. To achieve this goal, ICRC enforces the Iowa Civil Rights Act. The Act protects Iowans' rights to housing and real property from unfair or discriminatory housing practices from any person, owner, or person acting for an owner including real estate brokers or salespersons, attorneys, auctioneers, agents or representatives by power of attorney or appointment, or any person acting under court order, deed of trust. These practices include:

- To refuse to sell, rent, lease, assign, sublease, refuse to negotiate, or to otherwise make unavailable, or deny any real property or housing accommodation or part, portion, or interest therein, to any person because of the race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status of such person.
- To discriminate against any person because of the person's race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status, in the terms, conditions, or privileges of the sale, rental, lease assignment, or sublease of any real property or housing accommodation or any part, portion, or interest in the real property or housing accommodation or in the provision of services or facilities in connection with the real property or housing accommodation.
- To directly or indirectly advertise, or in any other manner indicate or publicize that the purchase, rental, lease, assignment, or sublease of any real property or housing accommodation or any part, portion, or interest therein, by persons of any particular race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status is unwelcome, objectionable, not acceptable, or not solicited.
- To discriminate against the lessee or purchaser of any real property or housing accommodation or part, portion, or interest of the real property or housing accommodation, or against any prospective lessee or purchaser of the property or accommodation, because of the race, color, creed, religion, sex, sexual orientation, gender identity, disability, age, or national origin of persons who may from time to time be present in or on the lessee's or owner's premises for lawful purposes at the invitation of the lessee or owner as friends, guests, visitors, relatives, or in any similar capacity.
- To conduct other additional unfair or discriminatory practices as defined in Iowa Code 216.8A.

The Commission's primary duty is to enforce local laws that prohibit discrimination in employment, public accommodations, housing, education and credit through investigations. The Commission also provides conflict resolution services including mediation and conciliation for civil rights matters. In addition to its role as a law enforcement agency, the Commission works to prevent discrimination by providing training and education to the public.

U.S. Department of Housing and Urban Development

HUD's Office of Fair Housing and Equal Opportunity (FHEO) seeks to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities by leading the nation in the enforcement, administration, development, and public understanding of federal fair housing policies and laws. Laws implemented and enforced by FHEO include:

- The Fair Housing Act
- Title VI of the Civil Rights Act of 1964
- Section 109 of the Housing and Community Development Act of 1974
- Section 504 of the Rehabilitation Act of 1973
- Titles II and III of the Americans with Disabilities Act of 1990
- The Architectural Barriers Act of 1968
- The Age Discrimination Act of 1975
- Title IX of the Education Amendments Act of 1972
- Section 3 of the Housing and Urban Development Act of 1968

In addition, the FHEO investigates fair housing complaints, conducts compliance reviews, ensures civil rights in HUD programs, and manages fair housing grants. The FHEO also manages several programs and initiatives including the following:

- **Section 3 of the Housing and Urban Development Act of 1968** requires that recipients of certain HUD financial assistance, to the greatest extent possible, provide job training, employment, and contract opportunities for low- or very-low income residents in connection with projects and activities in their neighborhoods.
- **Fair Housing Assistance Program** funds state and local government agencies to investigate fair housing complaints.
- **Fair Housing Initiatives Program** funds private organizations to conduct fair housing activities.
- **Fair Housing Accessibility FIRST** provides information about the Fair Housing Act's requirements to design and construct covered housing to be accessible to persons with disabilities.
- **National Fair Housing Training Academy** provides fair housing and civil rights training to federal, state, and local agencies, educators, attorneys, industry representatives, FHEO staff, and other housing industry professionals.
- **Limited English Proficiency Initiative** provides funding for the creation and promotion of translated materials and other programs that support the assistance of persons with limited English proficiency in utilizing the services provided by the Department of Housing and Urban Development.

Fair Housing Outreach and Resources

Fair housing informational programs are essential for City officials, staff, and members of the community. As such, it is important to evaluate the level of knowledge in the public and among government and other community officials and leaders about actions constituting discriminatory behavior, fair housing laws, and fair housing objectives. This section describes fair housing education and outreach activities that are currently underway within Iowa City. The City strives to regularly assess the effectiveness of these activities in informing people of their rights and responsibilities and in reducing the kinds of prejudice and intolerance that lead to discriminatory actions. It examines non-City organizations that affirmatively further fair housing in the City as well.

City-Led Actions

Generally, EHR provides outreach, education, and training to the community on unlawful discrimination and the civil rights history of Iowa. It also collaborates with individuals and organizations in the planning and coordinating of events to educate on civil and human rights. To address unlawful discrimination through outreach, EHR provides targeted information to organizations, businesses, and other entities. This includes preparing specialized educational materials such as pamphlets, brochures and advertisements on unlawful discrimination. Staff also creates yearly reports including the annual report for the HRC. EHR has gone from 25 outreach activities in FY2016 to 71 activities in FY2018.

HRC works closely with EHR to assist with public outreach and education through workshops, public events, and the dissemination of information. HRC activities utilize a variety of media in multiple languages and a variety of venues at different times and days of the week to provide numerous opportunities for people to attend. HRC also annually provides financial support to organizations to offset the costs of organizing, planning, and facilitating educational public forums or programs and activities that are designed to eliminate discrimination. In addition, HRC annually hosts a Human Rights Awards Breakfast to recognize local persons and businesses that have significantly contributed to human rights in the community and a Human Rights Youth Awards Banquet to recognize local youth for activities that promote human rights. From FY2013 to FY2018, the HRC participated in some 378 programs and activities, in addition to providing numerous financial sponsorships to further their mission.

Neighborhood Services also affirmatively furthers fair housing by enforcing fair housing standards through the City's adopted Affirmative Marketing Plan which applies to housing projects with 5 or more units using federal funds. Requirements include making fair housing information available and advertising available units in ways that further the goals of the Fair Housing Act.

The following page outlines specific examples of ways the City of Iowa City has sought to affirmatively further fair housing since the adoption of the 2014 Analysis of Impediments to Fair Housing (2014 AI). Note that this list is in no ways exhaustive; for additional examples for each category, view the Annual Report for the HRC as prepared by EHR.

Sponsorships. Sponsored local organizations and public forums and community gatherings on issues pertinent to human and civil rights and discrimination in the community including Applying Fair Housing in Your Daily Life and Fair Housing Trainings delivered by the ICRC.

Memberships. Supported fair and affordable housing groups, such as the Johnson County Affordable Housing Coalition, National Fair Housing Alliance, and National Community Reinvestment Coalition.

Programs. Offered free fair housing training to community groups, organizations, City boards and commissions that make recommendations to Council on housing matters, landlords and realtors. This included a fair housing training for area landlords, realtors, and apartment associations that discussed

myths about Housing Choice Voucher (HCV) Program and outreach to the community on how to file civil rights complaints.

Trainings. Participated in numerous anti-discrimination events pertinent to fair housing, including trainings for Human Rights staff to ensure they are current on salient issues. These included an all-day workshop for employees by the Government Alliance on Race and Equity, the “Fair Housing and Communities Against Hate” event, and the “Renting 101” program for new renters hosted by UI Student Legal Services, in addition to attendance at National Fair Housing Alliance webinar “Using Data to Assess Fair Housing” and four other Fair Housing trainings.

Materials. Produced, displayed, distributed, and made available fair housing and anti-discrimination materials in multiple languages and formats. In addition, the City provided information online and to over 30 social service agencies, including Johnson County Social Services and the Iowa City Housing Authority, and to area realtors and over 440 area landlords participating in the HCV program. Community members can also receive equity and human rights news and event information via email. The *Fair Housing* brochure and *Fair Housing on Housing Choice Vouchers and Other Rental Subsidies* brochure are available in Swahili, Spanish, African French, Mandarin Chinese, and Arabic. Landlord mailers have included *Assistance Animals in Housing* and *Religious Discrimination in Housing*.

Advertisements. Advertised fair housing at relevant venues, including the UI Legal Services website. Weekly ads are run in the Daily Iowan, the Daily Iowan Rental Guide, local Iowa City monthly publications, and the Iowa City Press Citizen. The City also ran Public Service Announcements on City Channel 4 to explain how rental subsidies are included in local fair housing laws. In addition, Fair Housing signs are placed in Iowa City buses, posted at City-owned recreational centers, and run on City Channel 4. Fair housing signs and brochures are available at community centers, social service agencies (including CDBG/HOME subrecipients), City Hall, the library, the UI’s Office of Equal Opportunity, Kirkwood Community College Learning Center, and Johnson County Social Services.

Testing. John Marshall’s Fair Housing Legal Support Center & Clinic led the most recent testing in 2015.

Equity Initiatives. Conducted other miscellaneous efforts to affirmatively further fair housing. An online complaint form was created to allow persons to submit discrimination complaints online 24/7. In FY17, EHR mailed a Fair Housing Discrimination Survey to 166 HCV recipients; the results were reported and made available to the community and the media. Finally, Neighborhood Services has utilized the City’s newly developed Race and Equity toolkit to determine if certain projects funded by HOME/CDBG will have negative effects on impacted residents and how to reduce any potential negative impacts. NDS also monitors CDBG/HOME projects for compliance with City affirmative marketing requirements, including collecting Affirmative Housing Marketing plans.

Other Organizations

Beyond City efforts, there are long-established relationships with a variety of other local and regional agencies that provide fair housing information, conduct outreach, and inform people of their Civil Rights and ways to submit complaints to the appropriate channels. These groups conduct and/or sponsor programs and events to increase awareness about fair housing which supplements those provided by the HRC and EHR.

Some such public, private, and non-profit organizations include but are not limited to the Iowa City Housing Authority, The Housing Fellowship, Hawkeye Area Community Action Program (HACAP), Shelter House, Housing Trust Fund of Johnson County, and the Iowa City Area Association of Realtors. Iowa City's legal community also refers clients to the HRC. Occasionally the City must turn over cases to other agencies when and if there is a conflict.

Iowa Legal Aid is a nonprofit that provides free legal advice and referrals on a broad range of issues, including housing, consumer, elderly, family, health care, pensions and public benefit issues. Housing issues make up a significant portion of their caseload, including landlord-tenant disputes. In addition, the UI supplies students with the expertise they need through student liaisons and student legal services. Due to the prevalence of students in Iowa City, these are extremely valuable partners in combating fair housing violations and educating residents.

Often these organizations also collaborate with each other, such as through the Local Homeless Coordinating Board and Affordable Housing Coalition. Recent initiatives include the RentWise Iowa tenant education program which will help tenants be successful, including information on tenant rights and fair housing.

Overall, the City and its partner organizations have developed a sound institutional structure to address fair housing issues within the community. By participating in groups such as the Local Homeless Coordinating Board, the Affordable Housing Coalition, Livable Communities of Johnson County, and the Housing Trust Fund of Johnson County, the City supports in coordination and communication of those groups. In addition, the City annually contributes funds to many of those groups, providing further incentive for collaboration.

Fair Housing Complaints

This section reviews fair housing complaints at local, state, and federal levels. This includes information from the City of Iowa City Office of Equity and Human Rights (EHR), the Iowa Civil Rights Commission (ICRC), and HUD's Office of Fair Housing and Equal Opportunity (FHEO). Generally, more information is available at the local level rather than the State and Federal levels. Note that fewer complaints does not necessarily indicate a lack of a problem. There are numerous reasons that fair housing issues go unreported, including a lack of awareness or knowledge, the subtlety of discriminatory practices, fear of retaliation, and the high priority that finding housing takes over reporting discrimination. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments

Local Fair Housing Complaints

In Iowa City, a person who believes they have experienced an unfair or discriminatory practice can file a complaint with EHR within 300 days of the last alleged discriminatory act. Upon the filing of a verified complaint, EHR will serve notice on the respondent. Notice shall include both a copy of the complaint and a statement of the respondent's procedural rights and obligations under the law or ordinance. Service shall be effected by certified mail within 7 days of filing for complaints alleging discrimination in the area of housing. If applicable, verified complaints are cross-filed with the ICRC.

Following the filing of a complaint, the City conducts a thorough and impartial investigation of the allegations in the complaint. Complaints are reviewed and written opinions prepared using appropriate legal analytical frameworks. The Human Rights Coordinator determines whether probable cause exists. In the area of housing, the HRC shall, during the period beginning with the filing of a complaint and ending with the finding that there is or is not probable cause, to the extent feasible, engage in mediation with respect to the complaint.

1. A mediation agreement is an agreement between a respondent and the complainant and is subject to HRC approval.
2. A mediation agreement may provide for binding arbitration or other method of dispute resolution. Dispute resolution that results from a mediation agreement may authorize appropriate relief, including monetary relief.
3. A mediation agreement shall be made public unless the complainant and respondent agree otherwise, and the HRC determines that disclosure is not necessary to further the purposes of this chapter relating to unfair practices or discrimination in housing or real estate.
4. The proceedings or results of mediation shall not be made public or used as evidence in a subsequent proceeding without the written consent of the persons who are party to the mediation.

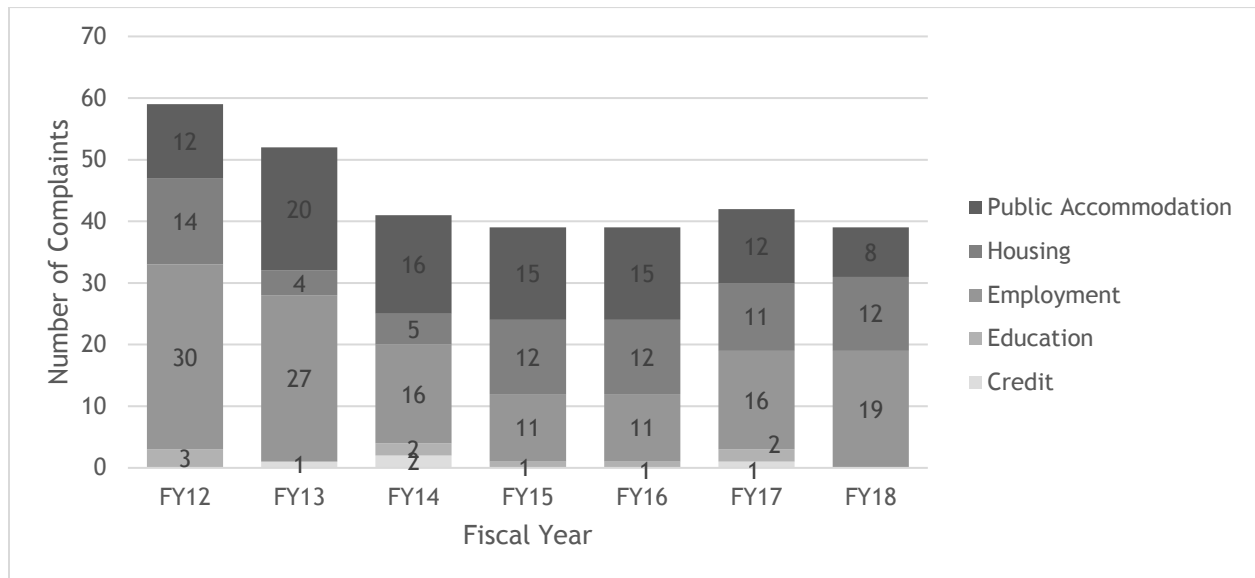
Complaints are resolved in a variety of different ways, including mediation, conciliation, right to sue, administrative closure, no probable cause, probable cause, satisfactorily adjudicated, or public hearing.

From FY12 to FY18, all complaints have generally decreased. In addition, the number of complaints resolved within a year from the date filed has increased from 41% in FY12 to 88% in FY18. Overall, this indicates that staff is investigating and resolving complaints alleging unlawful discrimination in a timely manner. Most complaints end in administrative closure, followed by no probable cause.

From FY12 to FY18, the largest number of complaints received by the HRC was related to employment discrimination followed by public accommodation, then housing discrimination complaints. The most cited characteristic for alleged discretionary conduct within that time is race (cited in 41% of complaints), followed by disability (33%) and sex (23%). Retaliation is also cited in 33% of complaints. Generally, complaints based on disability and age have both decreased over time. Overall, HRC

received 70 complaints that alleged discrimination in housing, averaging approximately 10 per year. This is a similar amount as were received at the time of the 2014 AI.

FIGURE 44: HRC COMPLAINTS BY AREA



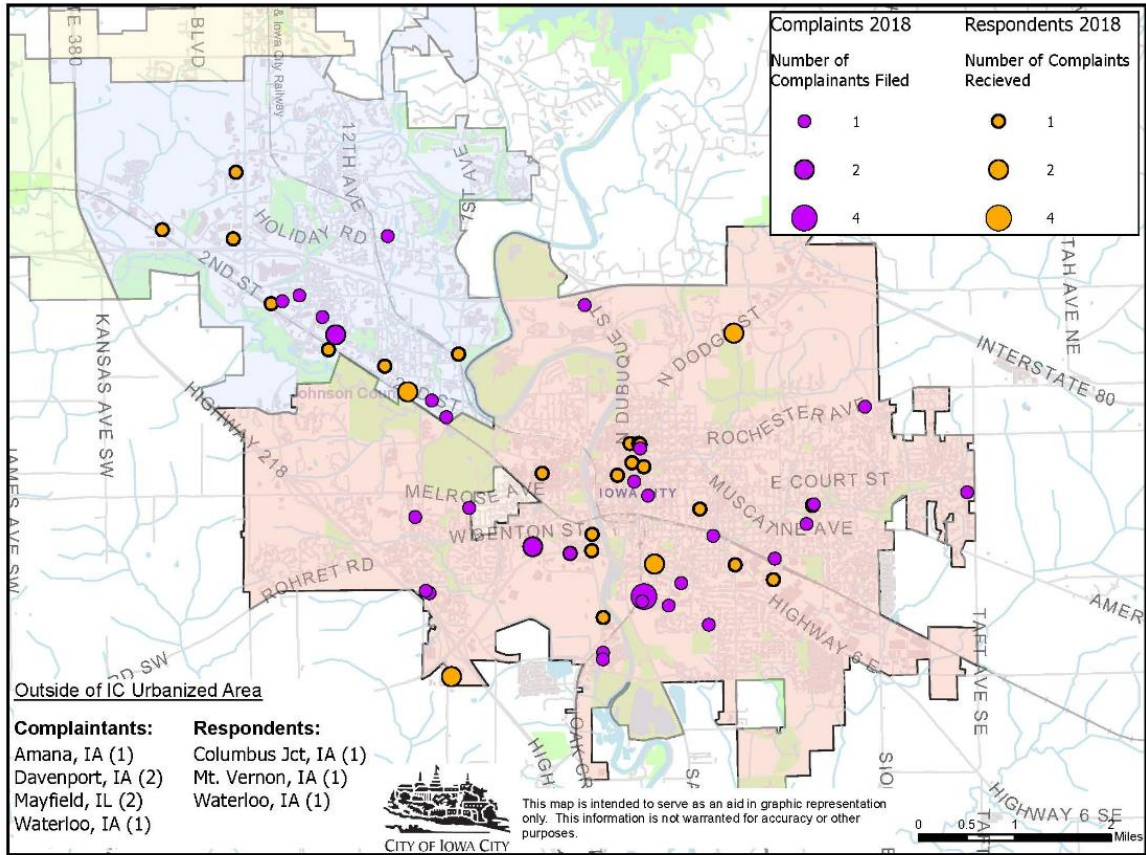
Source: HRC Annual Reports

FIGURE 45: RESOLUTION OF COMPLAINTS

RESOLUTIONS	FY12	FY13	FY14	FY15	FY16	FY17	FY18	FY12- FY18	
Lack of Jurisdiction	5	3	0	4	2	4	7	25	14%
Outside Jurisdiction	-	-	-	-	6	11	8	25	14%
Jurisdiction Waived	-	-	-	-	-	-	7	7	4%
Closed, complainant non-compliant	-	-	-	1	0	0	0	1	1%
Withdrawn	2	0	3	4	0	3	1	13	7%
Administrative Closure	8	9	11	2	7	8	6	51	28%
Mediated	2	5	2	2	2	5	3	21	12%
Satisfactorily Adjusted	0	0	0	0	0	0	0	0	0%
No Probable Cause	7	9	5	7	1	0	3	32	18%
Probable Cause	0	0	1	0	0	0	0	1	1%
Right to Sue	0	3	1	0	0	0	0	4	2%
Total	24	29	23	20	18	31	35	180	100%
Percent Resolved	41%	56%	62%	51%	42%	69%	88%	57%	

Source: HRC Annual Reports

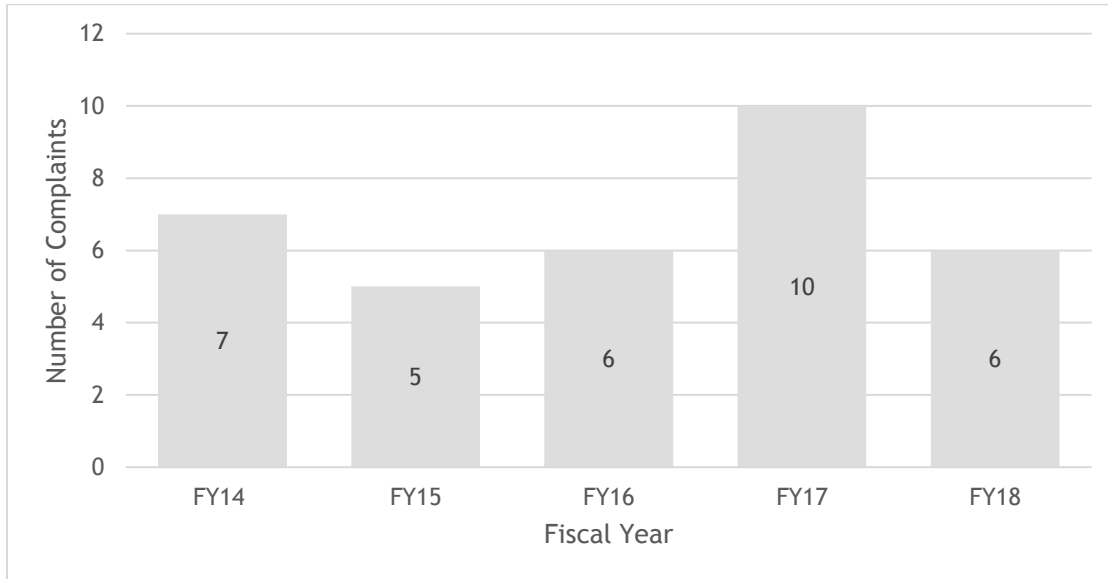
FIGURE 46: 2018 COMPLAINTS BY LOCATION OF COMPLAINANT AND RESPONDENT



Iowa Civil Rights Commission

In correspondence with the City, the Iowa Civil Rights Commission (ICRC) noted that their case management system has limitations in search capabilities, so they could only provide the number of housing complaints that were filed with the ICRC and occurred in Iowa City. Housing complaints in Iowa City fluctuate between 5 and 10 per year, though no numeric trend is visible.

FIGURE 47: ICRC HOUSING COMPLAINTS IN IOWA CITY



Source: Correspondence with ICRC

In Johnson County, ICRC reported that their database showed 91 complaints in FY2018. Of those, approximately 17% are housing complaints with the most often basis cited being disability (includes Iowa City local investigations in addition to State investigations). This would suggest that the majority of cases in Johnson County did not occur in Iowa City in FY18. Overall, complaints with the ICRC demonstrate similar trends to those found in Iowa City.

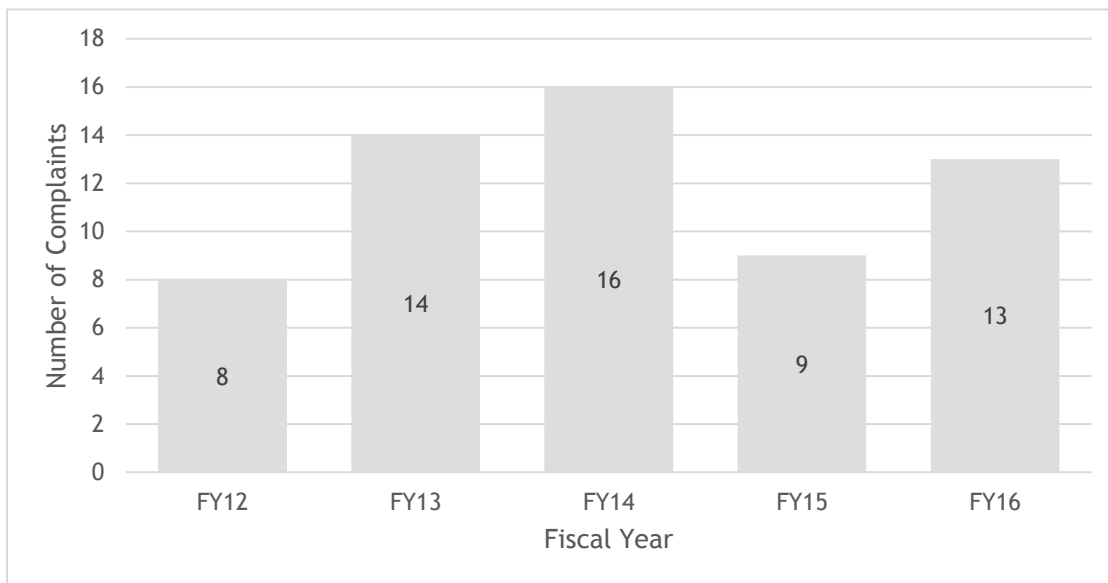
U.S. Department of Housing and Urban Development

Fair housing complaints filed with HUD's Office of Fair Housing and Equal Opportunity (FHEO) that occurred in Johnson County (includes Iowa City, Coralville, North Liberty, Hills, Lone Tree, Oxford, Shueyville, Solon, Swisher, Tiffin, and University Heights) between 2012 and 2016. Approximately 60 cases were filed with FHEO, or an average of 12 per year. While the information provided by HUD is brief and generalized, it is possible to draw some conclusions from the data. Of the cases filed:

- 60% were filed on the basis of disability;
- 23% were filed on the basis of race; and
- 15% were filed on the basis of familial status.

Again, there is no visible trend in the number of cases. However, it does support anecdotal evidence that those with a disability often experience housing discrimination and report it.

FIGURE 48: FHEO HOUSING COMPLAINTS IN JOHNSON COUNTY



Source: FHEO data

The Secretary of the U.S. Department of Housing & Urban Development has not charged or made findings of discrimination, and neither the Secretary, nor any private plaintiff, has filed fair housing discrimination suits. In addition, no such suits, charges, and/or findings are pending in the City of Iowa City.

Past Plan findings

The City has historically striven to address any issues identified in its past Analyses of Impediments to Fair Housing. Past outcomes have included achieving substantial equivalency between the federal Fair Housing Act and the Iowa City Human Rights Ordinance, increased fair housing education and training to members of appointed boards and commissions, and a focus of CDBG/HOME dollars on affordable housing activities.

The 2014 AI found five major impediments to Fair Housing Choice in Iowa City. The City has systematically targeted each one over the past five years to affirmatively further fair housing. The City reports actions annually in its Consolidated Annual Performance and Evaluation Reports. This section provides a summary of the identified impediments and the actions taken.

I. Racial and ethnic concentrations in Iowa City.

Finding. The 2014 AI identified a spatial concentration of minorities in Iowa City, with Black-White segregation increasing over the last two decades. To address this issue, the 2014 AI recommended the City adopt a mandatory inclusionary zoning policy that would apply to all new ownership and rental housing development. The purpose would be to create affordable housing at scattered locations throughout the City which may translate to additional housing opportunities for low- and moderate-income families of color in a variety of neighborhoods.

Actions. Staff facilitated the development of the Riverfront Crossings district, a new mixed use, mixed-income neighborhood near downtown. A guiding principle for the district was to promote equitable, affordable housing close to downtown and the University. The City adopted financial incentives and policies to increase affordable housing opportunities, including tax increment financing and affordable housing requirements. At least 10% of the total units created in this district must be affordable for a period of ten years. The Council approved affordable housing requirements for this neighborhood in 2016.

The City also sought to prevent racial/ethnic concentrations by funding new affordable housing throughout the City as reflected in the City's Affordable Housing Action Plan. In 2018, Council adopted an affordable housing policy for newly annexed property into the City that sets a goal of making 10% of total new units to be affordable, preferably for 20 years or more. The City also began funding other new affordable housing initiatives including land banking and support for the Housing Trust Fund of Johnson County, among other efforts. 13 of the 15 Action Steps identified in the Affordable Housing Action Plan have been implemented as of May 2019.

The City also uses its Affordable Housing Location Model to help prevent concentrations of poverty and race. The model prohibits the acquisition or construction of new City-funded affordable rental housing in areas with high crime, high free and reduced lunch rates, and within proximity to other affordable rental housing. The model does not apply to rehabilitation of affordable rental housing, or to housing targeting populations that would not affect the free and reduced lunch rates (such as for elderly and/or persons with disabilities). It was recently revised as discussed below.

II. The Affordable Housing Location Model (AHLM) disperses certain types of assisted housing but may reduce the parcels of land where new assisted rental housing may be built or acquired.

Finding. The 2014 AI found that the AHLM used by the City is a well-constructed effort to disperse certain types of assisted housing units across the city, but in doing so, it reduced the parcels of land within the city where new assisted rental units can be built. Furthermore, parcels where new assisted rental units were permitted are reportedly priced higher than parcels where new assisted rental

housing cannot be built. As such, the model may have constrained the supply of new assisted rental housing. Since assisted rental housing often serves households of color, the 2014 AI asserted this reduced new housing options for persons of color. To overcome this impediment, the 2014 AI recommended that for projects that must comply with the policy, the City should provide land at prices comparable to land at locations not permitted by this model. Alternatively, the City should provide cash supplements from non-CDBG/ HOME sources that offset land cost differentials to such projects.

Actions. The Housing and Community Development Commission (HCDC) reviewed the model to make more land available for City assisted affordable housing and to make changes such as reducing the number of variables considered and modifying thresholds for proximity to other affordable properties. Council approved this revised Model in 2017 which increased the number of properties in Iowa City where the City can assist new affordable rental housing.

The City also created additional City funding sources. A total of \$1,325,000 has been granted to Housing Trust Fund for affordable housing during FY17-FY19. An additional \$530,000 was made available to two Low Income Housing Tax Credit projects since FY17 and to the other affordable housing efforts. These local funds help in part to reduce the land and/or development price to the point of affordability. Iowa City still seeks to disperse assisted rental housing throughout Iowa City to allow low-and-moderate income households, often minorities, to choose neighborhoods outside of those with high racial and ethnic concentrations. The City continues to review its affordable housing policies to ensure they are reaching Council's goals of providing a variety of housing options in a range of neighborhoods.

III. African Americans and Hispanics may experience unfair treatment in home mortgage lending.

Finding. The 2014 AI found that minorities in Iowa City may not have fair access to residential lending. In their analysis of HMDA data, the share of home loan applications from persons of color appeared lower than their share in the population, and applications from Blacks and Hispanics appeared to have denial rates higher than those for White applicants. The AI recommended additional research and suggested the City implement policies to ensure banks that it conducts business with do not discriminate.

Actions. In 2017, EHR held a Fair Lending training conducted by the Federal Reserve Bank of Chicago for area lenders. In addition, the City joined the National Community Reinvestment Coalition, which allowed EHR to access resources and better evaluate lending practices regarding black and Hispanic loan seekers in Iowa City. Internal procedures at some institutions were found to skew results; loan files opened but not completed for any reason were coded as denials, including cases where the loan-seeker did not provide paperwork or follow through with the loan. This created an artificially high rate of "denials" for black and Hispanic households. This closer analysis did not find the same discrepancies and unfair treatment in loan rates. However, the City continues to monitor loan denials for disparate treatment.

IV. Barriers to mobility and housing choice for protected classes and persons of low income.

Finding. The 2014 AI survey of renters receiving housing assistance showed that landlords discriminate against renters using Housing Choice Vouchers (HCV) and engage in many illegal practices. Such behavior adversely affects HCV recipients' search for housing and the quality and location of housing they find. In turn, it affects HCV utilization rates. The City's overall voucher utilization rates have ranged between 89% in 2006 to 102% in 2012. In 2011, of the 664 new and moving vouchers issued, only 88% were utilized; 12% (~ 79 vouchers) expired.

Actions. In 2015, HRC recommended to Council to include HCVs in the Public Assistance Source of Income protected class so that it would be unlawful to deny the rental of property to a person based on the use of a HCVs to subsidize their rent. Council approved the code amendment in 2016.

To address landlord-side problems as HCV recipients search for housing, the City expanded existing landlord education programs aimed at busting the myths about HCV tenants and the HCV program. Since 2016, 92 new owners/landlords are participating in the HCV program. In 2017, over 900 households receiving vouchers were surveyed regarding their experiences in renting with an HCV.

To address tenant-side problems that result in failed searches, the City encouraged local nonprofits involved in the provision of housing and related services for low income persons to help HCV recipients in their search for housing. In addition, a more liberal voucher extension policy was implemented to mitigate incidents of failed searches. The City's cumulative voucher utilization for Calendar year 2018 was around 100% and has remained high.

V. Fair housing violations go unreported because of opinions/attitudes that things will never change and/or lack of knowledge of available resources to address fair housing for those in protected classes

Finding. Two surveys of renters from the 2014 AI suggested that many violations of fair housing laws are not being reported because of the fear of retaliation or lack of knowledge about how to report such violations. It was recommended that HRC expand its education programs regarding fair housing laws and set up a mechanism for easy and confidential reporting of fair housing violations, perhaps using a web-based format or smart-phone technology.

Actions. The City's primary action has been to expand outreach efforts as detailed in previous sections. This was especially robust following the modification to the Iowa City Civil Rights Ordinances making HCV a protected class. In addition, HRC created an online form that allowed 24/7 submittals of complaints and produced more materials and held trainings to ensure tenants were aware of their rights, including their right to be free from retaliation. In addition, the HRC surveyed 166 HCV recipients as part of a follow up and made the findings of that survey available. Outreach and education continue to be a vital part of HRC's efforts to end discrimination.

Trends, Patterns, and Concerns

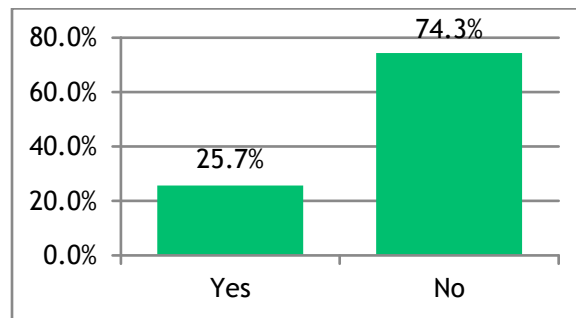
Based on complaints alone, race, disability, and sex seem to be the primary forms of discrimination in Iowa City. The City's fair housing enforcement appears relatively effective. Unfortunately, a lack of filed complaints does not necessarily indicate a lack of a problem. Some persons may not file complaints because they are not aware of how or where to file a complaint. Discriminatory practices can also be subtle and may not be detected by someone who does not have the benefit of comparing their treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Finally, households may be more interested in achieving their priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. As such, additional information was gleaned from the City's 2018 Fair Housing Survey, conducted as part of this study.

A total of 234 respondents completed the survey to help evaluate fair housing choice in Iowa City by answering questions about their experiences in the housing market. A copy of the survey can be found in the Appendix. Just over one quarter said they experienced housing discrimination since living in the area. Of these, the most common perceived form of discrimination was public assistance as a source of income (46%), followed by age (28%), disability (23%), race (20%), and familial status (18%). Some of these responses included multiple factors at play.

Of those who felt discriminated against, only 3% reported the discrimination. The most common reasons for not reporting were that "I didn't know what good it would do" (69%), followed by "I didn't know it was a violation of the law" (31%), "I didn't know where to file" (24%), and "I was afraid of retaliation" (18%). This is further corroborated by other questions indicating only 43% of respondents said they understood their fair housing rights, and only 37% knew where to file a housing discrimination complaint. These results mirror past surveys on these topics in that the primary reasons for not filing were helplessness, fear, and a lack of knowledge about how to file a complaint.

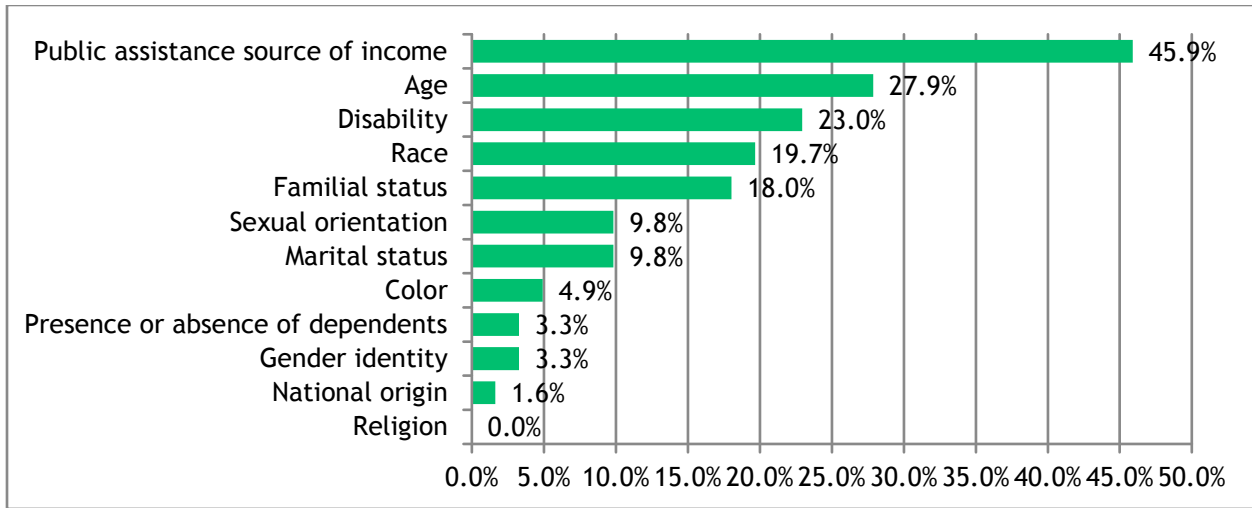
These results generally support previous evidence and provide additional nuance in understanding discrimination in Iowa City. However, it does speak to a need for improving outreach and education levels around the City. As such, the City should further develop a program to ensure broad knowledge of legal protections for all residents. In addition, fear of retaliation has prevented people from reporting; the City should find ways to address fears of retaliation if people come forward with concerns. Education should also showcase how the process has concrete outcomes to address those who "didn't know what good it would do". If things are reported, the City can more effectively address the issue and work to improve. If not, the problem will remain undocumented and unaddressed. Outreach also needs to be targeted to specific populations such as those who are foreign born. As such, the City should likely review its Limited English Proficiency (LEP) plan to ensure these populations have equal access to information regarding fair housing.

FIGURE 49: SINCE LIVING IN THE AREA, DO YOU BELIEVE YOU EXPERIENCED HOUSING DISCRIMINATION?



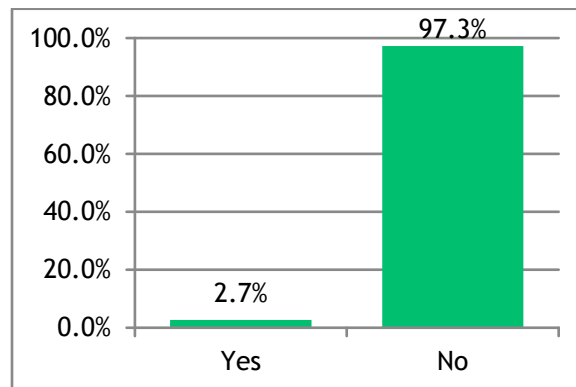
2018 Fair Housing Survey results: 222 answered

FIGURE 50: IF YES, ON WHAT BASIS DO YOU BELIEVE YOU WERE DISCRIMINATED AGAINST?



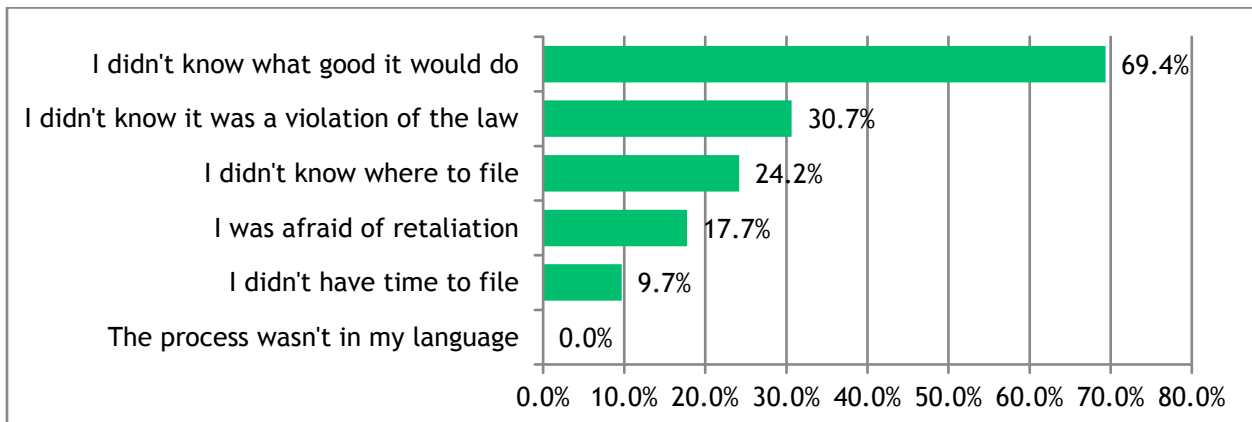
2018 Fair Housing Survey results: 61 answered

FIGURE 51: DID YOU FILE A REPORT OF DISCRIMINATION?



2018 Fair Housing Survey results: 73 answered

FIGURE 52: IF NO, WHY DIDN'T YOU FILE?



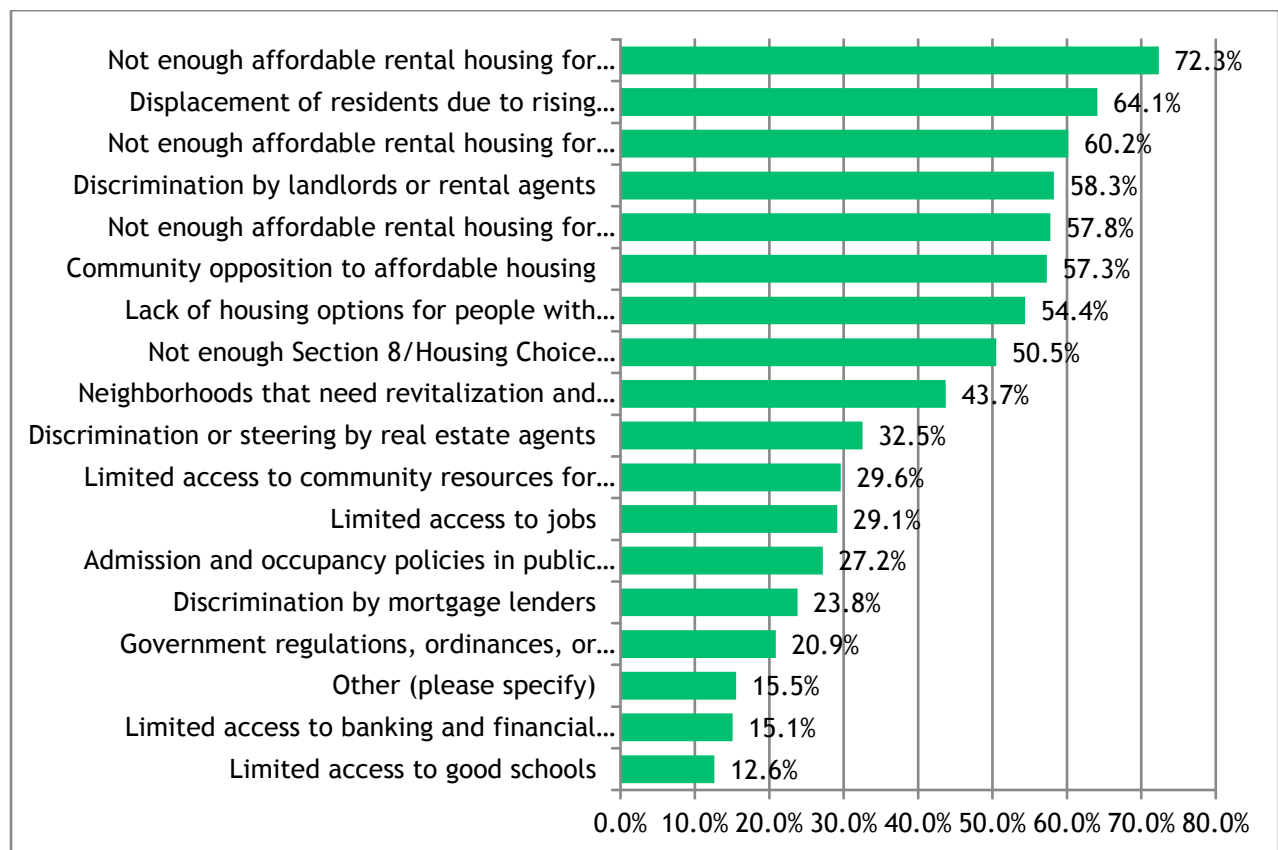
2018 Fair Housing Survey results: 62 answered

Chapter 4: Identification of Impediments to Fair Housing Choice

A Fair Housing Choice study must include a review of impediments to fair housing choice in the public and private sectors. Impediments are any actions, omissions, or decisions taken because of protected characteristics that restrict housing choices or their availability or that have the effect of restricting housing choices or their availability based on a protected characteristic. Policies, practices or procedures that appear neutral on their face, but which operate to illegally deny or adversely affect the provision of housing may constitute such impediments.

Lack of affordable housing is the most prevalently cited impediment to fair housing choice in Iowa City. This includes housing for individuals, large families, and small families. Other major issues include displacement due to rising housing costs, discrimination within the rental market, community opposition to affordable housing, lack of housing for persons with disabilities, and a lack of Housing Choice Vouchers (HCV).

FIGURE 53: DO YOU THINK THE FOLLOWING ARE BARRIERS TO FAIR HOUSING CHOICE IN IOWA CITY?



2018 Fair Housing Survey, 206 answered

This Chapter explores these issues and more, including other potential impediments due to public or private sector policies and practices. Each section concludes with a discussion. These discussions are summarized and consolidated in the final chapter of the study.

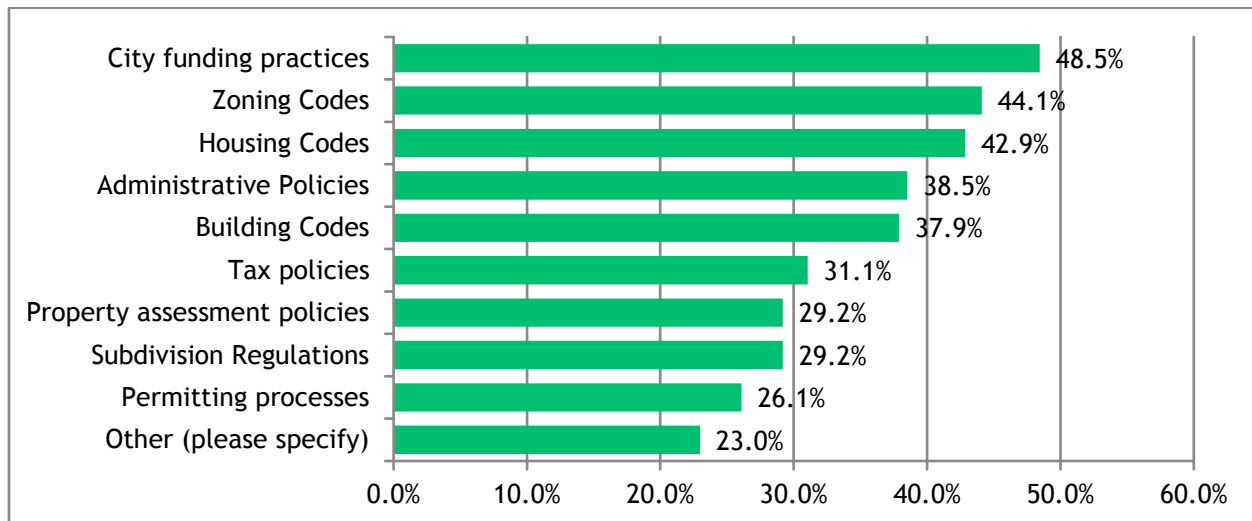
Public Sector

An important element of analyzing impediments to fair housing choice is examining the impact of public policy. Only a fraction of the 31,000 dwelling units in Iowa City have received public assistance or are under public ownership. The decline in federal funding opportunities for affordable housing for lower income households has also shifted more affordable housing production to state, county, and local governments. However, public policy provides a framework in which private sector decisions are made affecting fair housing choice, affordable housing, and other related issues. From a regulatory standpoint, these include local measures to control land use (such as zoning regulations) that define the range and density of housing resources that can be introduced in the community. Housing quality standards are enforced through the local building code and inspections procedures. Through partnerships with the private sector, the public sector can also directly influence outcomes.

The perception of housing needs and the intensity of a community's commitment to housing-related goals and objectives are often measured by elected officials, board and commission members, and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of housing choice requires a team effort. Public leadership and commitment are a prerequisite to strategic action. Fortunately, Iowa City has people in positions of leadership that are interested in improving access and the affordability of housing for all protected classes.

This section evaluates the public policies in Iowa City to determine opportunities for furthering the expansion of fair housing choice. In the 2018 Fair Housing Survey, respondents asked to identify public barriers to fair housing choice cited city funding practices most frequently, followed by zoning and housing codes. However, no response got a majority. Regardless, these and other policies are explored in subsequent sections of this chapter.

FIGURE 54: WHAT CITY POLICIES OR PRACTICES MAY ACT AS A BARRIER TO FAIR HOUSING CHOICE?



Source: 2018 Fair Housing Survey, 161 answered

Organization

Iowa City is organized under the Council-Manager form of government. Iowa Citizens elect seven Iowa City residents to the City Council for overlapping four-year terms. Four Council Members are nominated and elected by the eligible electors of the City at large. The other three are District Council Members and are nominated by the eligible electors of their respective districts and elected by the qualified voters of the City at large. The Council, in turn, selects one of its members to serve as mayor for a two-year term. The Mayor presides at the City Council meetings and has one vote on the Council - the same as the other six members.

Many of the City's policies related to fair housing are undertaken by the Department of Neighborhood and Development Services (NDS). Housing and community development programs, including the HOME and CDBG programs, are administered by the Neighborhood Services division which includes the Iowa City Housing Authority (ICHA). Neighborhood Services coordinates consolidated planning and fair housing planning initiatives, including plan preparation with citizen and community participation, in addition to directly managing CDBG- and HOME-funded activities and other programs such as housing rehabilitation, Housing Authority programs, housing inspection services, Iowa City's public art program, and neighborhood association outreach. As previously mentioned, the Office of Equity and Human Rights (EHR) also carries out much of the City's policy related to enforcement and outreach regarding fair housing. All the City's departments strive to ensure equal opportunity for housing, services, and employment.

Appointed Boards & Commissions

The City understands the important relationship between the membership of its boards and commissions and the decisions they make regarding activities that may disproportionately affect protected classes. They also provide a valuable method to obtain public input in decision-making. As such, the City encourages diversity in the representation of residents in the community, including by race, ethnicity, sex, gender, persons with disabilities, and persons with children to ensure those selected provide an overall membership that represents all segments of the community. The City also abides by a gender-balance policy. Members must be at least 18 years old and reside in Iowa City limits to serve and are appointed by City Council and assisted by City staff.

Meetings are open to the public and held in locations accessible to all persons. Records of all business is publicly available. Human Rights staff provides regular trainings to commissioners regarding fair housing rules in Iowa City to ensure they are appropriately informed. Several City boards and commissions make decisions that are more likely to influence fair housing choice for protected classes.

Iowa City Housing and Community Development Commission (HCDC)

HCDC assesses the City's community development needs for housing, jobs, and services for low- and moderate-income (LMI) residents and promotes public and private efforts to meet such needs by:

- Assessing and reviewing policies and planning documents related to the provision of housing, jobs and services for LMI residents;
- Reviewing policies and programs of the Neighborhood Services division and making recommendations regarding them to Council;
- Reviewing and making recommendations to Council regarding the use of public funds to meet the needs of LMI residents;
- Actively publicizing community development and housing policies and programs, and seeking public participation in assessing needs and identifying strategies to meet these needs; and
- Recommending to Council amendments, supplements, changes and modifications to the Iowa City Housing Code.

Specifically, this includes reviewing HUD-required documents, including Consolidated Plans, Annual Action Plans, and ICHA documents, and recommending to Council. They also make recommendations to Council about how to allocate funding, including CDBG and HOME dollars.

Members are appointed to 3-year terms and when possible, HCDC strives to have at least one person with expertise in finance, one person with expertise in construction, and one person who receives rental assistance. HCDC is assisted by Neighborhood Services staff. Current members include Paula Vaughan, Chair; Vanessa Fixmer-Oraiz, Vice-Chair; Christine Harms; Charles Eastham; John McKinstry; Maria Padron; Megan Alter; Mitchell Brouse, and Peter Nkumu.

Iowa City Planning and Zoning Commission (P&Z)

P&Z serves as an advisory body to City Council on all matters pertaining to the physical development of Iowa City, including the Comprehensive Plan and any laws pertaining to land development necessary to implement the Comprehensive Plan. Duties include:

- Making surveys, studies, maps, or plans inside or outside of the city which affect the City's Comprehensive Plan
- Making recommendations to Council regarding planned developments and plats or replats of subdivisions which show areas intended to be dedicated for public use
- Making recommendations for streets, parks, rights of way, or other public improvements

- Conducting comprehensive studies of present conditions and future growth of the City to guide and coordinate development in accordance with the City's present and future needs
- Preparing a zoning ordinance, preliminary reports regarding proposed amendments, holding public meetings, and making recommendations to Council regarding the Ordinance
- Holding public hearings on and adopting the Comprehensive Plan and recommending to council amendments, supplements, or modifications to the plan

Specifically, this includes reviewing and making recommendations to Council on rezonings, subdivisions, zoning overlays, and other discretionary matters regarding the Comprehensive Plan.

Members are appointed to 5-year terms. P&Z is assisted by Development Services staff. Current members include Michael Hensch, Chair; Max Parsons, Vice Chair; Mark Signs, Secretary; Carolyn Stewart Dyer; Phoebe Martin; Larry Baker; and Billie Townsend.

Iowa City Board of Adjustment (BOA)

BOA is a resident panel that reviews requests for special exceptions and variances. BOA also considers appeals when there is a disagreement about an administrative decision made by the City. Members act like judges, making decisions about individual properties and uses that may have difficulty meeting a specific zoning regulation or to resolve disputes about administrative zoning decisions. Decisions should serve the public interest, meet the intent of the zoning code, and be consistent with the Comprehensive Plan. Decisions of the Board are binding upon all parties unless overturned upon appeal to District Court.

Members are appointed to 5-year terms. The Board is assisted by Development Services staff and the City Attorney's office. Current members include Constance Goeb; Ernie Cox; Zephan Hazell; Ryan Hall; and Amy Pretorius.

Iowa City Human Rights Commission (HRC)

HRC is responsible for enforcing local anti-discrimination laws as well as for increasing awareness about discriminatory practices and how to combat them. Complaints may be related to discrimination in employment, credit, public accommodation and education on the basis of race, creed, color, religion, national origin, age, sex, marital status, disability, sexual orientation or gender identity. In addition to those classes, discrimination in housing is also prohibited based upon familial status, presence or absence of dependents, or public source of income (including Housing Choice Vouchers and other rental subsidies). The general responsibilities of the HRC include:

- Making recommendations to the Council for further legislation concerning discrimination;
- Cooperating with other agencies or organizations, both public and private, whose purposes are consistent with those of the Human Rights Ordinance;
- Educating the public on human rights and illegal discrimination, such as organizing and facilitating educational public forums that address one or more of the broad range of topics included within the rubric of human rights; and
- Coordinating programs to eliminate racial, religious, cultural and other intergroup tensions.

Members are appointed to 3-year terms and HRC strives to ensure the Commission is representative of the community. Therefore, appointments take into consideration persons of various racial, religious, cultural, social, and economic groups in the City. HRC is assisted by staff from the Office of Equity and Human Rights. Current members include: Tahuanty Pena, Chair; Bijou Maliabo, Vice Chair; Jeff Falk; Barbara Kutzko; Cathy McGinnis; Jonathon Munoz; Adil Adams; Jessica Ferdig; and Noemi Ford.

Historic Preservation Commission (HPC)

HPC conducts studies to identify and designate "conservation districts", "historic districts" and "historic landmarks". The commission may proceed at its own initiative or upon a petition from any person, group or association. HPC also reviews and acts upon all applications for certificates of appropriateness, in addition to furthering historic preservation efforts by making recommendations to Council and other commissions and boards on preservation issues when appropriate. Finally, HPC's duties include encouraging the protection and enhancement of structures with historical, architectural or cultural value and encouraging persons and organizations to become involved in preservation activities.

Members are appointed to 3-year terms. At least one resident of each designated historic district shall be appointed to the commission. Other members shall be chosen at large and shall have some expertise in history, urban planning, architecture, archaeology, law, sociology or other closely related field, or shall demonstrate interest in the area of historic preservation. HPC is assisted by Development Services staff. Current members include Kevin Boyd, Chair; Zachariah Builta, Vice Chair; Cecile Kuenzli; Sharon DeGraw; GT Karr; Gosia S. Clore; Thomas Agran; Quentin Pitzen; Helen Burford; Lee Shope.

Discussion

Members of classes protected by fair housing laws are well-represented on local boards and commissions. In these boards and commissions, protected classes represent most members. As such, they provide a valuable method through which the City solicits public input. This is especially true where public hearings, meetings, or events are held to allow other non-appointed members of the public to come and share their ideas and thoughts.

Public hearings can also provide circumstances in which individuals or groups can lobby for outcomes. This can be positive by providing an opportunity for advocacy for protected classes or creating other opportunities to further fair housing choice. Alternatively, it can lead to less positive outcomes, such as through groups lobbying for funds that may not align with adopted City plans and goals and more commonly, the opposition of community members to proposed or existing developments—including housing developments, affordable housing, publicly supported housing, multi-family housing, or housing for persons with disabilities. This practice is often referred to as "Not In My Backyard," or NIMBY-ism.

Opposition is often expressed in challenges to land-use requests, variances or lobbying of decision-making bodies which can slow or halt development. Community opposition can be based on factual concerns (based on demonstrable evidence) or on biases (focused on stereotypes, prejudice, and anxiety about the new residents or the units in which they will live). Community opposition, when successful at blocking housing options, may limit or deny housing choice for individuals with certain protected characteristics.

It is often up to volunteer board and commission members to identify and act on behalf of the entire community in accordance with adopted planning documents. In some cases, administrative procedures rather than board and commission decisions may better promote fair housing choice, or at least can support Council objectives that produce impartial, predictable outcomes. Based on survey respondents, more than half believe community opposition to affordable housing was a barrier to fair housing choice, and nearly half believe current City funding policies also act as a barrier. This may indicate a need to craft careful administrative policies that promote fair housing choice.

Planning

Planning documents guide general housing policies within the community. In Iowa City, planning documents encourage the development of a wide variety of housing types in diverse locations across the community. They also encourage social justice and racial equity initiatives which are vital to fair housing choice. In general, planning documents in Iowa City provide strong rationale for improving fair housing choice in a range of neighborhoods.

Comprehensive Plan

The Iowa City 2030 (IC2030) Comprehensive Plan provides a roadmap for the development of the community through 2030 and establishes land use and housing policies to help further that vision. In Iowa, plans also provide the rational basis for land use controls, including zoning and subdivision codes. IC2030's broad goals and objectives balance both preservation and change for the future of Iowa City.

The plan's housing component demonstrates a commitment to providing housing options for the City's diverse population. Its housing vision is as follows: "Iowa City is a community of neighborhoods with safe, attractive, and affordable housing options to serve residents throughout their lifetimes. To this end, the City of Iowa City will support policies that preserve and enhance the character of existing neighborhoods while encouraging diverse and affordable housing options in all neighborhoods—new and old." IC2030 lists five goals to achieve this vision:

1. Encourage a diversity of housing options in all neighborhoods.
2. Improve and maintain housing stock in established neighborhoods.
3. Maintain and improve the safety of all housing.
4. Preserve the integrity of existing neighborhoods and the historic nature of older neighborhoods.
5. Support sustainability initiatives to create more energy efficient development.

Regarding affordable housing, the plan states: "By allowing for a mix of housing types, moderately priced housing can be incorporated into a neighborhood, rather than segregated in one or two areas of the community. Small multi-family buildings can be incorporated on corner lots adjacent to arterial streets, and townhouses and duplex units can be mixed with single family homes within a neighborhood. Apartments located above commercial businesses provide needed housing while increasing the local customer base for the commercial establishments."

The plan is visionary in nature and sets the direction for specific policies and programs. It also lists two to ten strategies to meet each goal by 2030. The City's plan demonstrates a strong commitment to providing a variety of housing choices for its citizens. Neighborhood planning efforts also demonstrate how these broad policies can be applied in more specific contexts.

Strategic Planning

Whereas IC2030 take a long term view, City Council also conducts strategic planning to apply these principles over a shorter timeframe. In 2018, City Council engaged in a strategic planning process to define its top priorities, address significant new projects and initiatives, and establish a broad vision for the City's near future. City staff coordinates, implements, and executes these goals over a two-year period covered by the plan. The most recent Strategic Plan priorities were adopted March 20, 2018. It seeks to foster a more inclusive, just, and sustainable Iowa City by outlining the following areas of focus, many of which benefit fair housing choice in Iowa City:

1. Promote a strong and resilient local economy
2. Encourage a vibrant and walkable urban core
3. Foster healthy neighborhoods throughout the City

4. Maintain a solid financial foundation
5. Enhance community engagement and intergovernmental relations
6. Promote environmental sustainability
7. Advance social justice and racial equity

Affordable housing is a top priority for the Council. Beginning in 2016, Council created an Affordable Housing Action Plan which contained goals and implementation strategies to help tackle the affordable housing problem in Iowa City. Since 2016, 13 of the 15 action steps have been completed, including many of those discussed later in this section. Staff is currently in the process of updating the plan and its affordable housing strategies and initiatives. The City's current affordable housing policies will also be more fully developed in the upcoming update of City Steps, the City's 5-year Consolidated Planning document for federal entitlement programs.

In addition, Council established a Diversity Committee in 2012 to review issues relating to diversity in the City. The committee reviewed the policies, practices, and procedures of the Iowa City Police and Iowa City Transportation Services Departments to provide recommendations for improvement. In 2013, the Diversity Committee supplied their recommendations. The City implemented forms and a reporting process to incorporate these recommendations. The City Manager initiated a Diversity Task force and appointed an Equity Director to ensure the recommendations are implemented and in compliance with the goals of the City Council.

Regional Planning

Regional cooperation consists of formal networks or coalitions of organizations, people, and entities working together to plan for regional development. Regional cooperation in planning can help coordinate responses to identified fair housing issues and contributing factors because fair housing issues and contributing factors not only cross multiple sectors—including housing, education, transportation, and commercial and economic development—but these issues are often not constrained by jurisdictional boundaries. When there are regional patterns in segregation, limited access to opportunity, disproportionate housing needs, or the concentration of affordable housing, the lack of local or regional cooperation may restrict fair housing choice.

The City participates in regional planning through the Metropolitan Planning Organization of Johnson County (MPOJC). In 2007, and again in 2015, the City worked with MPOJC and the surrounding Cities to evaluate housing related issues from a regional perspective. Similarly, the City provided input to the Eastern Central Iowa Council of Governments (ECICOG) on their most recent Comprehensive Regional Development Strategy which includes a housing component. This document serves as both a Long-Range Transportation Plan and Comprehensive Economic Development Strategy for the region.

The City and surrounding jurisdictions strive to cooperate on a regional level, through both regional planning efforts, and through the Fringe Area Agreement which provides general coordination for development between jurisdictions. There are still additional opportunities to better coordinate both housing and fair housing planning on a regional level. As such, meaningful coordination of programs and policies is still an ongoing process.

Zoning & Development Codes

Land use and zoning laws generally refer to local regulation of the use of land and buildings, including the types of activities that may be conducted, the density at which those activities may be performed, and the size, shape and location of buildings and other structures or amenities. Zoning and land use laws affect housing choice by determining where housing is built, what type of housing is built, who can live in that housing, and the cost and accessibility of the housing.

As a home rule state, Iowa provides local governments the ability to control most land use decisions through creating and administering local controls if not preempted by State law. These include zoning, subdivision, and building ordinances, as guided by a Comprehensive Plan.

In Iowa City, the zoning ordinance allows the creation of a wide variety of housing types throughout the city, as encouraged by IC2030. The City's building code also promotes the construction of quality housing throughout the city. Neither the zoning ordinance nor the building code contain substantial restrictions on development that may pose impediments to fair housing for protected classes. In effect, both ordinances help implement the housing goals contained in the City's comprehensive plan. However, there are some changes that could be made to further improve development regulations from the perspective of fair housing.

Local provisions may impede housing choice. This study analyzes the following requirements:

- The ability to develop housing in a range of types (including multi-family units), densities, minimum lot size and width requirements
- The flexibility of utilizing alternate designs (such as cluster or planned residential developments)
- The treatment of manufactured or modular homes compared to stick-built dwellings
- Definitions and restrictions on the number of unrelated persons in dwelling units based on the size of the unit or the number of bedrooms.
- The treatment of housing facilities for group homes and persons with disabilities

The City's most recent comprehensive zoning revision was adopted February 2007 after an extensive overhaul. Generally, older zoning ordinances are less effective as they often have been updated in a piecemeal fashion and may not address changing land uses, lifestyles, and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice for protected classes. It is also important to note that affordable housing requirements do not necessarily guarantee a zoning ordinance's fairness.

Since adoption, the City has updated its ordinance several times to address changing state laws and to react to changing local circumstances. This includes the form-based zoning regulations that guide development/redevelopment in certain areas.

Traditional Zoning

In the more traditional portion of the City's zoning code, residential uses are allowed in a variety of contexts. Restrictive land use that excludes certain types of housing, particularly multi-family or rental housing, can discourage the development of affordable housing, which has a higher likelihood of containing protected classes. Allowing varied residential types reduces the potential of impeding housing choice for members of protected classes.

The City has five residential single family zoning districts:

- RR-1, Rural Residential Zone
- RS-5, Low Density Single Family Residential Zone
- RS-8, Medium Density Single Family Residential Zone
- RS-12, High Density Single Family Residential Zone
- RNS-12, Neighborhood Stabilization Residential Zone.

The code permits detached single family dwellings in all single family residential zones and provisionally allows detached zero lots, attached single family, duplexes, and group home dwellings in RS-5, RS-8, and RS-12. Because RNS-12 was created to accommodate downzoning near downtown Iowa City, it allows multi-family, but only if it was conforming under the previous zoning designation.

The City also has five multi-family residential zoning districts:

- RM-12, Low Density Multi-Family Residential Zone
- RM-20, Medium Density Multi-Family Residential Zone
- RNS-20, Neighborhood Stabilization Residential Zone
- RM-44, High Density Multi-Family Residential Zone
- PRM, Planned High Density Multi-Family Residential Zone.

The code allows multi-family housing in all RM zones. In RM- 12, RM-20, and RNS-20, the code also permits detached single family units and provisionally allows attached single family, detached zero lots, duplex units, and group homes. Special exceptions for short-term shelters may also be allowable.

Finally, several commercial/mixed use zones also permit residential development:

- CO-1, Commercial Office Zone
- CN-1, Neighborhood Commercial Zone
- CC-2, Community Commercial Zone
- CB-2, Central Business Service Zone
- CB-5, Central Business Support Zone
- CB-10, Central Business Zone
- MU, Mixed Use Zone

MU zones allow the same residential uses as RM-20. In other commercial zones, multi-family and some group housing is allowed, as are short- and long-term shelters and detention facilities (halfway housing). Most multi-family residential uses are provisional with additional requirements.

The code has site standards that are applied to all development, though they are mostly limited to access, parking, visibility, signage, landscaping/screening, and lighting. Provisional uses allow development subject to additional regulation which can impose cost in return for improved design. For example, requiring articulation and high-quality material façade for attached single family units in certain zones or higher standards for multi-family construction in single family zones and the Central Planning District. Most are reviewed during site plan review, though some require a more extensive design review process which public input suggests can be costly. Special exceptions are reserved for uses that may have a greater impact on surrounding properties. This classification must be approved by the Zoning Board of Adjustment and must meet stricter requirements and rationale. The following page summarizes allowable housing types by zone as defined in the more traditional zones.

FIGURE 55: IOWA CITY ZONING USES

		Single Family Residential Zones					Multi-Family Residential Zones				Commercial/Mixed Use Zones									
USE CATEGORIES	SUBGROUPS	RR-1	RS-5	RS-8	RS-12	RNS-12	RM-12	RM-20	RNS-20	RM-44	PRM	CO-1	CN-1	CI-1	CC-2	CB-2	CB-5	CB-10	MU	
Residential Uses																				
Household living uses	Detached single family	P	P	P	P	P	P	P	P										P	
	Detached zero lot line	PR	PR	PR	PR		PR	PR	PR										PR	
	Attached single family		PR ²	PR	PR		PR	PR	PR										PR	
	Duplexes		PR ²	PR	PR	PR	PR	PR	PR											PR
	Group households	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR	PR		PR	PR	PR	PR	PR
	Multi-family uses						P	P	P	P	P	PR	PR		S	PR	PR	PR/S	P	
Group living uses	Assisted group living						S	PR	PR	PR	PR	PR		S					PR	
	Independent group living					1		PR		PR	PR									
	Fraternal group living					1		PR	S	PR	PR									
Community service uses	Community service - shelter						S	S	S	S	S	S		S	S	PR	PR	S	S	
	Community service - long term housing											PR/S		PR/S	PR/S	PR	PR			
Detention facilities (includes halfway housing)														S						

Source: Iowa City Code of Ordinances, obtained December 18, 2018

P = Permitted

PR = Provisional

S = Special exception (See 14-4B for requirements on provisional uses and special exceptions.)

1 = Multi-family and group living uses in the RNS-12 zone must comply with the special provisions contained in section 14-2A-7.

Form-Based Zoning

Adopted in 2014, the Riverfront Crossings (RFC) form-based zoning code promotes economically vital, mixed use, pedestrian friendly development in areas near downtown and the University. Unlike traditional zoning, form-based standards regulate through requirements on allowable development patterns, building and frontage types, parking locations, and treatments instead of minimum lot standards.

The standards for each subdistrict define building and site development conditions that affect the quality of the built environment and ensure projects are consistent with the Downtown and Riverfront Crossings Master Plan and the Central District Plan. Subdistricts include:

- RFC-SD, South Downtown Subdistrict
- RFC-P, Park Subdistrict
- RFC-SG, South Gilbert Subdistrict
- RFC-U, University Subdistrict
- RFC-CX, Central Crossings Subdistrict
- RFC-G, Gilbert Subdistrict
- RFC-WR, West Riverfront Subdistrict
- EMU, Eastside Mixed Use
- RFC-O, Orchard Subdistrict

All subdistricts are mixed use and allow a range of buildings, including multi-dwelling and apartment buildings. Most also allow mixed use buildings, liner buildings, townhouses, and live-work townhouses. A few of the less dense subdistricts allow rowhouses or cottage homes. Regardless, all RFC zones permit a much higher density and intensity of uses compared to most other zones in Iowa City.

The City may also award up to five floors of additional building height for projects that reserve a minimum of 15% of the dwelling units within the building as affordable or workforce housing. In the Central Business Zones and the RFC District, a density bonus in the form of an exemption from parking requirements may also be granted by the City for dwelling units committed to the City's assisted housing programs or any other affordable housing program approved by the City. Up to 30% of the units within any building may qualify for this exemption. In addition, any project with housing in the district must include 10% affordable housing. As such, RFC helps make housing that is relatively affordable in high-demand areas near downtown.

The City is also currently in the process of developing form-based standards for the South District of Iowa City. This will act as a pilot for potentially creating form-based controls for other newly developing areas of Iowa City. At the time of this writing, this code is still being developed.

Residential Lot Sizes

Excessively large lot sizes may deter the development of affordable housing which may impede housing choice for members of protected classes who are more likely to be in low income households. A balance should be struck between areas with larger lots and those with smaller lots that more easily support the creation of affordable housing. Figure 57 lists residential size standards/restrictions per zone for the City's more traditional zones.

By right, developers can build new detached single family homes on lots as small as 3,000 square feet (sf) with lot widths of at least 30 feet in MU zones. For RS zones, the minimum area is 5,000 sf with a width of 45 feet. Attached housing types in RS zones allow for denser development with lots as small as 3,000 sf and decreased lot widths. Minimum lot sizes and widths for detached single family homes increase to 8,000 sf with 60-foot widths in RS-5 zones, up to 40,000 sf in RR-1. In addition, the City provides provisional bonus options that can further increase density in RS zones. If parking and vehicle

access is restricted to the lot rear, then lot sizes, widths, and setbacks can be reduced by 10% to 40%, depending on the zone. This further allows developers to increase density and affordability in developments. Unfortunately, many do not take advantage of this due to the cost of installing alleyways.

For multi-family housing, minimum lot size requirements range from no requirement in commercial zones to 8,175 sf in RM-12. However, the code also requires a minimum area per dwelling unit (du) which ranges from 435 to 2,725 sf for 1-bedroom units, 875 to 2,725 sf for 2-bedroom units, and 1,315 to 2,725 sf for 3-bedroom units. The standard is constructed to encourage more bedrooms per unit in zones that allow less density, such as RM-12. Multi-family units are capped at 3-bedrooms. The code also allows density bonuses for elder apartment housing in certain zones.

Block lengths and street widths also affect density. Subdivision design standards state blocks should range from 300 to 600 feet along local and collector streets and be at least 600 feet along arterials. Longer block faces may be allowed in large lot development, along high capacity roads, or where other factors prevent shorter block lengths. Cul-de-sacs are not encouraged but may not exceed 900 feet. Standard rights-of-way range from 60 feet on local residential streets to 100 feet for arterial streets.

Accounting for subdivision standards, the densest detached single family block that could be developed would be 5.8 dwelling units per acre (DU/acre). With density bonuses, this could increase to 8.7 DU/acre in RS-12. Multi-family has more variance depending on the context, but the densest standard multi-family development ranges from 12.9 DU/acre in RM-12 to 81.1 DU/acre in PRM. Most developments would be below these densities due to topography, block sizes and configurations, and other factors.

FIGURE 56: MAXIMUM DENSITY BY ZONING DISTRICT SUBDIVISION STANDARDS (IN DWELLING UNITS PER ACRE)

Zoning District	RS-5	RS-8	RS-12	RM-12	RM-20	RM-44	PRM
Single Family (No Bonus)	4	5.8	5.8	4.7	4.7	NA	NA
Single Family (Bonus)	4.9	6.5	8.7	NA	NA	NA	NA
Multifamily	NA	NA	NA	12.9	19.6	70.5	81.1

Note: Accounts for subdivision standards assuming local streets

Overall, requirements for lot widths, yard setbacks, design standards, and amenities for offsite improvements are not found to limit affordability to higher-income households. Almost all residential zones allow lot sizes of less than ¼ acre, which is generally small enough to encourage some affordability. The Ordinance also does not include exterior design/aesthetic standards for all single family dwelling units regardless of size, location, or zoning district which can be an exclusionary practice.

FIGURE 57: SIZE STANDARDS/RESTRICTIONS IN ZONES ALLOWING RESIDENTIAL DEVELOPMENT

Zone/Use		Min. Lot Requirements (sf)				Min. Setbacks (ft)			Max. BR/ Unit	
		Lot Size	Lot/Units			Lot Width	Front	Side		Rear
			1-BR	2-BR	3-BR					
RR-1	Detached SF	40,000	40,000			80	156	5+2 ²	20	n/a
	Other uses ¹	40,000	n/a			80	20	5+2 ²	20	n/a
RS-5	Detached SF	8,000	8,000			60	156	5+2 ²	20	n/a
	BONUS SF	6,000	6,000			50	10	5+2	20	n/a
	Duplexes	12,000	6,000			80	156	5+2 ²	20	4
	Attached SF	6,000	6,000			40	156	0/10 ⁵	20	4
	Other uses ¹	8,000	n/a			60	20	5+2 ²	20	n/a
RS-8	Detached SF	5,000	5,000			45	156	5+2 ²	20+	n/a
	BONUS SF	4,000	4,000			40	10	5+2	20+	n/a
	Duplex	8,700	4,350			70	156	5+2 ²	20+	4
	Attached SF	4,350	4,350			35	156	0/10 ⁵	20	4
	Other uses ¹	5,000	n/a			45	20	5+2 ²	20	n/a
RS-12	Detached SF	5,000	5,000			45	156	5+2 ²	20+	n/a
	BONUS SF	3,000	3,000			30	10	5+2	20+	n/a
	Duplex	6,000	3,000			55	156	5+2 ²	20+	4
	Attached SF	3,000	3,000			20/28 ⁷	156	0/10 ⁵	20	4
	Other uses ¹	5,000	n/a			45	20	5+2 ²	20	n/a
RNS-12	Detached SF	5,000	5,000			45	156	5+2 ²	20+	n/a
	Duplex	6,000	3,000			45	156	5+2 ²	20+	4
	Multi-family	5,000	Existing ⁴			45	156	5+2 ²	20	3
	Other ¹	5,000	n/a			45	20	5+2 ²	20	n/a

Zone/Use		Min. Lot Requirements (sf)					Min. Setbacks (ft)			Max. BR/ Unit
		Lot Size	Lot/Units			Lot Width	Front	Side	Rear	
			1-BR	2-BR	3-BR					
RM-12	Detached SF	5,000	50,007			55	155	5+2 ²	20+	n/a
	Duplex	6,000	3,000			55	155	5+2 ²	20+	4
	Attached SF	3,000	3,000			20/28 ⁶	155	0/10 ⁴	20	4
	Multi-family	8,175	2,725	2,725	2,725	60	20	10	20	3
	Group living	8,175	See below			60	20	10	20	See Below
	Non-res. ¹	5,000	5,000			60	20	10	20	n/a
RM-20	Detached SF	5,000	50,007			55	155	5+2 ²	20+	n/a
	Duplex	3,600	1,800			45	155	5+2 ²	20+	4
	Attached SF	1,800	1,800			20/28 ⁶	155	0/10 ⁴	20	4
	Multi-family	5,000	1,800	1,800	2,700	60	20	10	20	3
	Group living	5,000	See below			60	20	10	20	See Below
	Non-res. ¹	5,000	n/a			60	20	10	20	n/a
RNS-20	Detached SF	5,000	50,007			40	155	5+2 ²	20+	n/a
	Duplex	5,000	2,500			40	155	5+2 ²	20+	4
	Attached SF	2,500	2,500			20/28 ⁶	155	0/10 ⁴	20	4
	Multi-family	5,000	1,800	1,800	2,700	40	20	10	20	3
	Group living	5,000	See below			40	20	10	20	See Below
	Non-res. ¹	5,000	n/a			40	20	10	20	n/a
RM-44	Multi-family	5,000	500	1,000	1,500	None	20	10	20	3
	Group living	5,000	See below			None	20	10	20	See Below
	Non-res. ¹	5,000	n/a			None	20	10	20	n/a
PRM	Multi-family	5,000	435	875	1,315	None	20	10	1011	3
	Group living	5,000	See below			None	20	10	1011	See Below
	Non-res. ¹	5,000	n/a			None	20	10	1011	n/a
CO-1	None	2,725	2,725	2,725	None	10	1	1	3	
CN-1	None	2,725	2,725	2,725	None	5	1	1	3	
CH-1	None	n/a			100	10	1	1		
CI-1	None	n/a			None	10	1	1		
CC-2	None	2,725	2,725	2,725	None	10	1	1	3	
CB-2	None	435	875	1,315	None	0	1	1	3	
CB-5	None	3-BDR units must be <30%			None	0/10 ⁴	1	1	3	
CB-10	None	3-BDR units must be <30%			None	0/10 ⁴	1	1	3	
MU	Detached SF	3,000	3,000			30	5/15 ⁶	5+2 ²	20	
	Duplex	3,600	1,800			45	5/15 ⁶	5+2 ²	20	
	Attached SF	1,800	1,800			20/28 ⁴	5/15 ⁶	0/10 ³	20	
	Multi-family	5,000	2,725	2,725	2,725	45	5/15 ⁶	5+2 ²	5+2 ²	3
	Group living	5,000	See below			45	5/15 ⁶	5+2 ²	5+2 ²	
	Non-res. ¹	None	n/a			None	5/15 ⁶	5+2 ²	5+2 ²	

Source: City of Iowa City Zoning Ordinance

Bedroom Caps

In addition to lot and block standards, the City also uses bedroom caps for certain types of properties to limit density. The caps indirectly restrict how many persons may occupy certain types of properties. In Iowa City's traditional zoning categories, duplexes and attached single family dwelling units are capped at 4 bedrooms and multi-family dwelling units are capped at 3 bedrooms. There are no bedroom caps on single family detached dwellings.

While the bedroom cap helps limit density for certain types of properties, they may have unintended consequences that affect the ability of protected households to find housing. For example, large families may have issues finding suitable housing if they prefer to live in townhomes or multi-family properties. This can be an especially challenging proposition as multi-family properties tend to be more affordable than single family detached units. As such, it may be beneficial to further review this regulation to consider allowing additional bedrooms to multi-family units under certain conditions

Alternative Design

Iowa City allows alternative designs through its Planned Development Overlay Zone (OPD) regulations. An OPD may be requested for any properties zoned residential or commercial if the property contains at least two acres or certain features, like environmentally sensitive or historic areas. Planned developments fall into several categories: sensitive areas development, conservation development, neo-traditional development, mixed use development, infill development or alternative ownership developments such as manufactured housing parks or multiple units on the same lot.

OPD zones generally allow higher densities and varied types of housing within a single development rather than creating a more segregated land use pattern common under traditional zoning regulations. Combining residential types also potentially supports a greater mixing of incomes, reducing economic segregation. Furthermore, flexibility can reduce the cost of infrastructure spread over a large area, increase economies of scale in site development, and promote other community objectives, including agricultural preservation or protection of environmentally sensitive lands. These factors can reduce some costs for this kind of development.

However, OPD rezonings must be reviewed and approved by the Planning & Zoning Commission. Because it is not a by-right process, it can increase the time and cost of developing OPD subdivisions and rezonings through multiple revisions and vocal NIMBY opposition. Neighborhood residents often resist placement of certain types of housing in their area. The attitudes of local officials, public policy, and careful planning and implementation of individual housing efforts by providers are key aspects for overcoming resistance of this kind. Despite these factors, the OPD remains a powerful tool to allow cluster development and promote better overall design.

Distribution of Zones

Despite a permissive zoning code and flexible alternative procedures, the current zoning map is heavily skewed towards single family residential development. Approximately 6,781 acres (47% of zoned land) are zoned for single family, compared with 963 (7%) zoned for multi-family, and 635 acres (4%) in commercial/mixed use zones that allow residential uses. Notably, over half of single family residential land is zoned RS-5. The remainder is either not zoned, as is the case for right-of-way or the Iowa River, or only allows non-residential commercial, industrial, research, and public uses. Note that this analysis only looks at the base zones; however, multi-family may be allowed through overlays that allow multi-family.

In total, 81% of residential land in the City is zoned for single family development. When looking at residential areas that are not yet developed (ID-RM and ID-RS zones), that ratio increases to 90%. Considering undeveloped land zoned Rural Residential which often acts as a residential Interim Development zone, the ratio of future single to multi-family zones further increases. This stands in contrast to the number of units developed in the community, which is skewed towards multi-family. The following table lists zones by area.

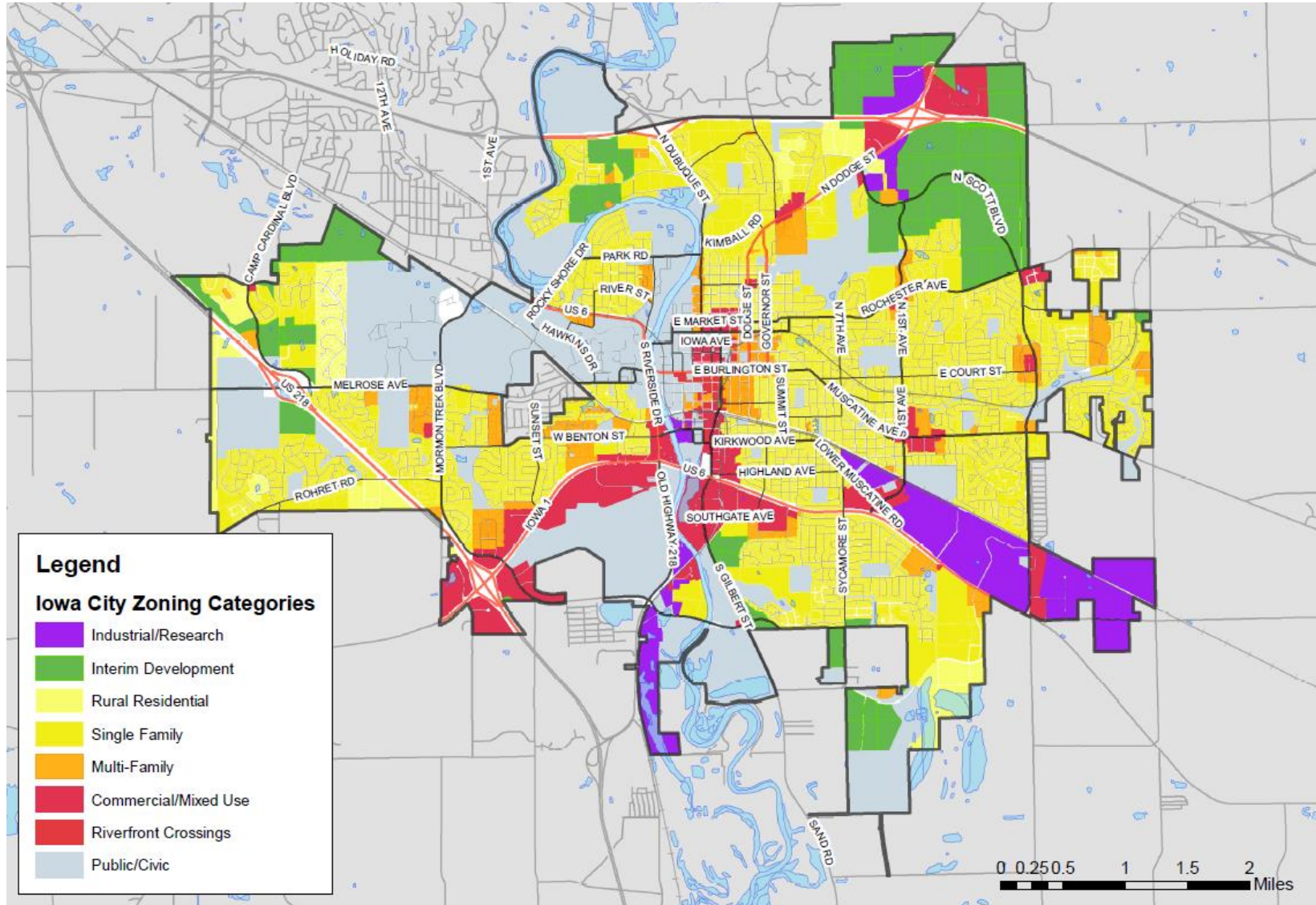
FIGURE 58: AREA BY ZONING TYPE

	# Acres	%
Interim Development Single Family	947.7	6.5%
Interim Development Multi-Family	104.5	0.7%
Single Family	5,832.90	40.2%
Multi-Family	858.7	5.9%
Commercial/Mixed Use (Allows Res.)	604.3	4.2%
Riverfront Crossings	31.1	0.2%
Commercial/Mixed Use (No Res.)	506.9	3.5%
Industrial/Research	1,752.00	12.1%
Public/Civic	3,881.40	26.7%
Total	14,519.60	100.0%

Source: City of Iowa City as of 3/1/19

This situation does not necessarily present a barrier to fair housing choice. Iowa City's Zoning Code is permissive enough that single family zones are often developed at densities that are affordable. In addition, the Future Land Use map as adopted in IC2030 shows most residential areas of the City as being up to 8 dwelling units per acre, and the plan notes that multi-family development may be appropriate for properties located at major intersections per the neighborhood design principles. However, it is often difficult for less dense residential zones to be upzoned to higher densities which can increase affordability. Developers must work with the Planning and Zoning Commission to get the project approved as with OPD projects. This allows neighbors or those with NIMBY attitudes to affect the availability of housing for low- and moderate-income households, including families with children, persons with disabilities, homeless persons, or lower-income persons of color. Sometimes these attitudes are indirectly disguised by concerns such as decreased property values, increased stormwater runoff, traffic concerns or environmental factors. As such, it can be a challenge when promoting fair housing objectives.

FIGURE 59: IOWA CITY CURRENT ZONING



Source: City of Iowa City

Definition of Mobile Home

Defining mobile homes differently than stick built homes or restricting their location to areas other than those where single family housing is permitted does not specifically impede housing choice for members of the protected classes. However, limiting a low-cost housing option through restrictions on mobile homes may disproportionately impact members of the protected classes. In Iowa City, mobile, manufactured, and modular homes may all be classified as single family dwellings as follows:

- **Mobile Homes:** Must be converted to real property and taxed as a site-built dwelling, as provided in the code of Iowa, or if they are located within a manufactured housing park approved through a planned development overlay rezoning process.
- **Manufactured Homes:** Must be manufactured or constructed under the federal manufactured home construction and safety standards that is only mobile to move it to a permanent site.
- **Modular Homes:** Must be manufactured at a place other than the location where it is to be placed, which is assembled on a permanent foundation or slab at the location where it is to be permanently located, and which does not have wheels or axles affixed as a part of its normal construction or require a license by any agency as a motor vehicle, special equipment, trailer, motor home or mobile home.

These definitions are inclusive and encourage a variety of housing stock choices by permitting manufactured, mobile, and modular housing on single lots like single family dwelling units. However, the code does not exert control over covenants in new subdivisions regarding these structures.

Definition of Family

Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes that limit their housing choice. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together which may impede the development of group homes, effectively impeding housing choice for the disabled. However, caps on unrelated individuals residing together may help avoid overcrowding and promote health and safety.

The City's zoning ordinance defines "family" as multiple persons related by blood, marriage, adoption or placement by an agency who occupy a dwelling unit as a single housekeeping organization. Family may also include two persons not related by blood, marriage or adoption or up to 8 persons with disabilities occupying a dwelling as a single housekeeping organization. Meanwhile, "Household" is defined as one or more persons residing in a dwelling as a single housekeeping organization where the responsibilities and expenses of maintaining the household are shared among the members. It also includes a group that meet the definition of a group household, discussed below.

Until 2018, the City's definition of family limited the number of unrelated persons in a dwelling unit to a maximum of three. The previous AI noted this definition can prohibit low-income persons that are unrelated by blood, marriage or adoption, from pooling resources to share a house. However, State law now preempts cities' ability to regulate household occupancy based on household relationships, rendering this definition useless.

To avoid over-crowding, new housing code regulations were established to ensure an adequate amount of space per household member, as discussed under the section on the Housing Code. This does not impact fair housing to the same extent as the City's previous regulations.

Regulations Affecting Group Homes and Persons with Disabilities

Group homes are residential uses which are unlikely to adversely impact a community. Consequently, group homes should be easily accommodated throughout the community under the same standards as other residential uses. This is especially true for group homes that serve members of protected classes such as persons with disabilities. Government policies that limit or exclude housing facilities for persons with disabilities or other housing for persons experiencing homelessness from certain residential areas may violate the provisions of the Fair Housing Act by indirectly discriminating against protected classes.

The City defines “group household” as individuals living together in one dwelling unit as a single housekeeping unit. Their relationship must be of a regular and permanent nature with a distinct domestic character, similar to a family. Group households must meet one of four definitions:

- **Family Care Home:** Up to 8 persons with disabilities occupying a dwelling unit as a single housekeeping unit. These may include residential care facilities, child foster care facilities, a supervised apartment living arrangement, or other small group residential arrangement. It does not include alternatives to incarceration, such as halfway houses.
- **Elder Family Home:** A group household managed or owned by a responsible party that offers a social living arrangement in a residence for 2 to 8 persons living, the majority of whom are elders, who are essentially capable of physical self-care.
- **Parental Group Home:** Up to 3 teenagers or adults and up to 4 children under 5 years of age, each of whom is related by blood to at least one of said teenagers or adults, placed in a residential dwelling unit by a government or social service agency and occupying it as a single housekeeping unit for social and/or economic support.
- **Elder Group Home:** The residence of a person who is providing room, board and personal care for up to 5 elders who are not related to the caregiver. Personal care means assistance with the essential activities of daily living which the recipient can perform personally only with difficulty, and may include bathing, personal hygiene, dressing, grooming and the supervision of self-administered medications, but not the administering medications.

Group households are permitted within any housing type and all single family zones, so long as they comply with all approval criteria and base zone standards. The owner must obtain a rental permit, but structures may not contain separate apartments. The City has no dispersal requirements to limit group households or housing for persons with disabilities.

Due to the large student population and issues with rooming houses, “Group Household Uses” are distinct from “Group Living Uses” which include assisted, independent, and fraternal arrangements. These are characterized by residential occupancy of a dwelling by a group of “roomers” who are not by definition a “household” or “group household” and have tenancy arranged for one month or longer. Such structures contain lockable, private rooming units for living and sleeping but not cooking. Bathroom facilities may be private or shared, and kitchen, dining, and other common facilities may be shared. Residents may receive care, training, or treatment services onsite. Examples include:

- **Assisted Group Living:** Group care facilities that are government licensed or approved to provide services in a residential setting to more than 8 individuals with disabilities, including nursing homes or other facilities that provide residential and skilled care services to convalescents or the elderly; also assisted living facilities.
- **Independent Group Living:** Rooming houses; student dormitories.
- **Fraternal Group Living:** Fraternities; sororities; monasteries; convents; and rooming house cooperatives.

Group Living does not include transient housing, which arranges tenancy for periods shorter than one month. Transient housing is considered temporary lodging and is classified as an institutional

community service - shelter use. Alternatives to incarceration, such as halfway houses, are classified as detention facilities. These are primarily allowed in multi-family and commercial zones.

Overall, the City's code is supportive of housing facilities for persons with disabilities. They are allowed in a wide array of locations to prevent their concentration and the definition of "group home" allows up to 8 unrelated people with disabilities to reside in single family dwelling units without a special/conditional use permits or public hearing. It also does not contain additional regulation to site a group home as a single family dwelling unit other than requiring it not contain separate dwelling units.

Regulations Affecting Permanent Supportive Housing

Community Service uses are classified as institutional/civic uses and are characterized as having a public, nonprofit, or charitable nature by providing a local, ongoing service to the community. Generally, these properties offer in-house services and/or regularly have employees onsite. Historically, semi-residential Community Service uses included shelter or short-term housing operated by a public or nonprofit agency where tenancy is less than one month.

"Long Term Housing" was added as a Community Service use in 2016 for agencies providing long-term housing for persons with disabilities. This may include onsite services such as special counseling, education, or training. Generally, this use is allowed in commercial zones despite being more similar to a residential/office mixed use. It is allowed provisionally or with a special exception, with additional requirements including a management plan, and it requires a neighborhood meeting for property owners within 200 feet before approval of occupancy. While an institutional/civic classification makes sense for shelter uses with tenancies of less than one month, it may be misapplied to Community Service - Long Term Housing.

In practice, the use has only been used once for Cross Park Place, a multi-family Permanent Supportive Housing (PSH) project for the chronically homeless, which combines affordable housing with voluntary support services. Because tenancies for this use are longer than one month, they appear to be closer to a standard residential use than an institutional/civic use. With services onsite, this may indicate it is a mixed use rather than an institutional/civic use. As such, it could create fair housing violations because it specifically provides housing for persons with disabilities. As a result, keeping Community Service - Long Term Housing as an institutional/civic use may be a potential fair housing issue.

Evaluation

One method to determine the level of risk for discriminatory provisions, developed by Mullin & Lonergan Associates, is to review the Zoning Code along 11 criteria that may affect fair housing for protected classes. If the impediment was not present or a positive measure was in place, a criterion is assigned a score of "1." Otherwise, it is assigned a score of "2." These 11 criteria are then averaged to determine a benchmark score. A score of less than 1.24 indicates the ordinance carries a low risk relative to discriminatory provisions for housing and members of the protected classes. Scores between 1.25 and 1.49 indicate moderate risk, and a score of 1.50 or more indicates high risk. The Ordinance was evaluated for the following criteria:

1. Defines "family" inclusively, without a cap on the number of unrelated persons, with a focus on functioning as a single housekeeping unit
2. Defines "group home" or similarly named land use comparatively to single family dwelling units
3. Allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use/conditional use permit or public hearing
4. Regulates the siting of group homes as single family dwelling units without any additional regulatory provisions

5. Has a “Reasonable Accommodation” provision or allows for persons with disabilities to request reasonable accommodation/modification to regulatory provisions
6. Permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right
7. Does not distinguish between “affordable housing/multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)
8. Does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts
9. Provides residential zoning districts with minimum lot sizes of ¼ acre or less
10. Does not include exterior design/aesthetic standards for all single family dwelling units regardless of size, location, or zoning district
11. Permits manufactured and modular housing on single lots like single family dwelling units

Based on this analysis, Iowa City’s Zoning Ordinance is at low risk relative to discretionary provisions for housing and members of protected classes. Only Criterion 1 and 5 were triggered. However, Criterion 1 is irrelevant due to recent State action. Criterion 5 should be addressed, as discussed below.

Discussion

The ordinance currently lacks specific “Reasonable Accommodation” policies and procedures which would allow persons with disabilities to request a reasonable accommodation/modification to regulatory provisions, including land use and zoning requirements. This can create a barrier to equal access to housing for persons with disabilities and should be added to the code.

Regarding affordable housing choices, the City could overcome these one of two ways. First, the City could amend the text of the code to allow denser development by-right in certain areas, as promoted by the Comprehensive Plan. For example, multi-family dwellings could be permitted by-right in single family residential zones as a provisional use if it meets certain criteria and is within a certain distance of major intersections. Note that the City is currently working with the Home Builder’s Association (HBA) to revise portions of the code to improve the ability to develop affordable housing. Second, the City could help take the onus off the developer to rezone land to higher densities where appropriate. One way to avoid this is to actively help developers upzone in areas that match the requirements in the plan, such as by mapping areas that staff would support for higher density development, or even by City-led map amendments where higher density housing already exists. This may be especially helpful where undeveloped land is zoned for single family. Similarly, the City could remove indirect restrictions on density such as bedroom caps for units that are not detached single family units, including attached single family, duplex, and multi-family dwellings.

Finally, the zoning ordinance has received many fragmentary updates since its initial adoption more than a decade ago. While the Code generally seems to accommodate the City’s planning and fair housing goals, codes that have been frequently updated may indicate a need for a comprehensive reevaluation. This is currently being discussed as a longer-term effort, but incremental improvements can still be made to ensure the Code is easy to follow and comprehensive yet flexible. Until then, some simple changes may further fair housing efforts in Iowa City, such as clarifying permanent supportive housing as a multi-family or mixed use rather than as a community service use or amending or eliminating the definition of family.

Building & Housing Codes

Local building, occupancy, and health and safety codes may affect the availability of housing for persons of color, families with children, and persons with disabilities. Neighborhood and Development Services enforce the City's Housing and Building Codes.

Building Code

In February 2019, Iowa City adopted the 2018 International Building and International Residential Codes to provide for the protection of the health, welfare and safety of the residents of Iowa City. The City also amended Code section R320 to implement universal design features that provide accessibility, usability, and visitability for all. This amendment expanded accessibility requirements from multi-family housing to all newly constructed housing that receives City financial assistance such as CDBG loans or tax increment financing.

Minimum accessibility requirements for all dwelling units include:

1. At least one step-less entrance on an accessible route, and on that level:
 - a. Interior doors must be framed to accommodate a minimum 38" clear rough opening, or a minimum clear door opening of 32" if public funds are used;
 - b. There must be a bathroom with a toilet and sink, and the ability to add a shower;
 - c. Exterior decks must be within 4" of the floor level; and
 - d. Electrical panels must have circuit breakers between 15" and 54 " above the floor.
2. Walls reinforced to provide grab bars adjacent to a toilet.
3. Wall switches between 15" and 48" inches above the floor.
4. Garages wired for power operated overhead.

These provisions exceed the requirements in the federal accessibility requirements found in the Americans with Disabilities Act, the Fair Housing Act, Section 504, and other related regulations.

Housing Code

The City inspects close to 20,000 rental units on a systematic basis, working with property owners, managers, and tenants to ensure conformance with the Iowa City Housing Code. Beginning in 1978, the City adopted the Code to establish minimum health and safety standards to protect and promote the welfare of tenants and the public. The Housing Code complements the zoning ordinance and identifies nuisance violations and how the City will enforce such violations. Iowa City's Housing Code standards exceed the "Housing Quality Standards" used by HUD.

Rental Permitting

To rent a residential unit in Iowa City, the City must issue a certificate of structure compliance and valid rental permit. Owner occupants, regardless of their number, are exempt from this requirement if they rent to no more than one tenant living in their unit. The documents are as follows:

- **Certificate of Structure Compliance** is typically a permanent document which states the date issued, type of structure, and street address. Certificates may be revoked if obtained illegally or when there is a material and substantial noncompliance which directly affects occupants' health and/or safety.
- **Rental Permits** indicate compliance with the Housing Code at the time of issuance. Permits are valid for a specified time and are transferable. Permits state the date of issuance, address, the owner or operator, the date of expiration, and contact information for the owner or designated agent. The City issues a rental permit for a unit complying with the Code upon payment of all fees, but not if there are open building permits on the property unless there is good cause, if

there are unpaid judgments against the owner for a Code violation, or if the owner failed to cure a violation on their properties. The City will not issue rental permits to an owner occupant for single- or two-family dwellings unless they document intent to vacate the dwelling for a minimum of 180 consecutive days, and this temporary permit is revoked without appeal if the owner fails to vacate the dwelling.

Residential units without a valid Certificate or Permit may be ordered vacated. Rental permit sanctions may be applied to an individual dwelling unit, the entire rental dwelling, or the premises. Each separate violation shall count as a basis for a rental permit sanction unless the owner qualifies for a defense to enforcement. Sanctions may include a reduced term rental permit, suspension, or revocation. Multiple violations within a 24-month period are required to warrant sanctions.

Housing Inspections

Housing Inspectors regularly inspect properties to determine the condition of all dwellings, units, structures, and premises in the City. Inspections of owner occupied, single family dwellings occur only upon request or complaint. Rental inspections are required every year for multi-family units built before 1995 or for single family or duplex units with 4 or more bedrooms. Otherwise, inspections are required every two years. Certain inspections may be partially self-certified, though it depends on the age of the building and if there is reason to believe substantial problems exist. Regular rental inspection fees are \$165 per structure, \$17 for each unit, and \$9 for each bedroom with a one-time \$40 fee charged for the Certificate of Structure Compliance. No fee is charged for the initial reinspection and for one reinspection of exterior work that has been granted an extension to complete. Fees will be assessed for additional reinspection or “no shows.” Failure to correct violations may also result in issuance of a citation and further legal action.

Rental inspectors are certified through the International Code Council (ICC) and receive continuing education on an ongoing basis, including fair housing training. Staff receives training on a regular basis to ensure all inspectors are knowledgeable about the Housing Code and the enforcement of the code is consistent amongst each inspector. Inspector assignments are rotated with the intention that an inspector will not complete two inspection cycles in a row at a particular property.

Rent Abatement

In 2017, the City adopted rent abatement policies when it determines an owner has failed to provide an essential service (water, sewer, electricity, heat); failed to remedy a condition that poses a substantial risk to the health or safety of the tenant; or rented a dwelling unit without a rental permit. Rent abatement means that the owner may not recover rent from the tenant due to the particular violation. The City must provide notice first, after which rent may be abated until the condition has been remedied. However, rent abatement is only used in very specific, limited circumstances.

Recent Code Changes

The City recently changed its rental permit process in response to state legislation that impacted the City’s ability to regulate rental occupancy by familial status in 2017. The City previously limited occupancy to up to three unrelated people in one dwelling to regulate density and overcrowding. In response to the State legislation, the City enacted an ordinance that established a 30% rental permit cap on single family homes and duplexes in several Iowa City neighborhoods near downtown to preserve neighborhood stability, among other goals. The ordinance did not impact multi-family buildings or existing rental properties. Other 2017 Housing Code amendments included provisions such as:

- **Bedroom requirements.** Rental property owners adding bedrooms must verify that the total bedroom square footage does not exceed 35% of the finished floor area of the dwelling. All new bedrooms must be at least 100 sq. ft. and all smoke alarms must be interconnected.
- **Physical Separation.** Existing duplexes must be permanently separated. Duplex units functioning as a single unit are not allowed and deadbolts are required on all unit doors.
- **Paving Restrictions.** Paving in backyards was restricted to limit the conversion of backyards into parking lots.
- **Inspection Frequency.** The frequency of rental permit inspections also increased, to help fund an additional Police and Code Enforcement Officers to address rental housing and nuisance violations like noise complaints and property maintenance standards.

As an existing policy, rental tenants, as well as single family homeowners, must follow City Code and mow grass, shovel sidewalks and pick up trash. Continued complaints will result in repercussions, including the possibility of suspending a landlord's rental permit if multiple violations occur over a 12-month period.

In 2019, the State passed additional legislation prohibiting rental permit caps in Iowa. In response, Council approved a rental moratorium in neighborhoods exceeding the 30% cap for formerly subject properties to provide time for the City to identify how to mitigate the impact of rental housing on neighborhood stability, housing affordability, and other factors affecting neighborhoods. As of yet, no policies have been discussed to promote these goals.

Discussion

Overall, the building code has provisions that provide accessibility for persons with physical disabilities and promote access to all persons.

The rental inspections process does not appear to provide a disparate impact on protected classes, though it does impact affordability in return for improved housing conditions. In the case of a single family 4-bedroom unit, the current process adds just over \$18 per month, most of which is likely passed through by the landlord to the tenant. This may have a larger impact on large, low-income families. However, most of the rental housing is multi-family or single family units with fewer than 4-bedrooms, which suggests a lower typical impact, even for lower income families.

Recent changes, including rent abatement, may also have an impact. In the case of rent abatement, this provides improved protections for tenants. As to the fair housing impacts of other current policies, the City should review ways to mitigate unintended consequences. The City may consider alternatives such as reducing or waiving rental inspection fees for properties owned and managed by non-profit housing providers and not requiring annual rental inspections based on one or more concurrent inspections with no items needing to be addressed. Fair housing concerns should also be kept in mind as new policies are being created.

Housing Authority

The Iowa City Housing Authority (ICHA) is the local Public Housing Authority (PHA) serving all of Johnson County, Iowa County, and Washington County north of Highway 92. Established in 1969 to administer housing assistance programs, it is a division of the City of Iowa City despite serving a broader jurisdiction than City limits. ICHA currently assists low-income families to acquire and maintain affordable housing through rental and ownership assistance funded by HUD. Rental programs include the Housing Choice Voucher (HCV), Veterans' Supportive Housing (VASH), and Public Housing Programs. Homeownership is supported under the HCV program. ICHA has a "High Performance" status for the HCV program as determined by HUD.

Programs

Public Housing. Public housing provides affordable, decent and safe rental housing for eligible low-income families, elderly persons, and persons with disabilities. HUD distributes federal subsidies to ICHA, which manages the housing. The City's Public Housing units are low-density and scattered across the City to conform and blend into the existing neighborhood architecture. For the Public Housing program, a family's income may not exceed 80% of the median income for the Iowa City Metropolitan Statistical Area (MSA) when they begin renting.

In 2018, the City owned and managed 81 units of public housing and achieved an occupancy of 97%. The total rental income from public housing properties totaled \$310,510, while the City paid \$30,540 as a Payment in Lieu of Taxes to the Johnson County Assessor. ICHA also paid \$301,907 to private sector contractors for the capital improvements, general maintenance and repair of the Public Housing properties in 2017. In total, Public Housing units represent 0.5% of the total rental units in the City. Five additional units of public housing will be added to the City's stock in 2019 upon completion of a mixed use building in downtown Iowa City.

Vouchers. ICHA manages two voucher programs - the Housing Choice Voucher (HCV) program and the Veterans' Affairs Supportive Housing (VASH) program. Both programs increase affordable housing choices for low-income households by allowing them to choose and lease safe, decent, and affordable privately-owned rental units. The voucher covers the difference between 30% of the household's income and the cost of rent. For the HCV program, a household's income may not exceed 50% of the median income for the area in which the household chooses to live.

In 2018, there were 1,215 total available vouchers with an additional 83 Veterans' Affairs Supportive Housing (VASH) vouchers. Utilization for its voucher programs was 98.3%. The HCV program paid landlords and owners of rental properties in Johnson County approximately \$7.8 million in Housing Assistance Payments. As of March 2019, 929 vouchers were in use in Iowa City, which represents 4.6% of the total number of rental units (19,656) in the City.

ICHA provides housing search assistance for voucher recipients primarily through their website which helps recipients locate landlords. Links are provided for affordable family housing, housing for elders and persons with disabilities, project-based affordable housing developments and general rental listings, including www.iowaHousingSearch.org which acts as a clearinghouse for affordable units. ICHA also works with local nonprofits involved in the provision of housing and related services for low income persons to help HCV recipients in their search for housing.

ICHA recently adopted a more liberal voucher extension policy to mitigate incidents of failed searches. In 2016, rental assistance as a source of income was made a protected class. However, failed searches are still possible due to bad searches, unreasonably high expectations for housing, bad credit, bad landlord references, or not having enough money for a security deposit. Based on surveys and public input, HCV recipients may still be facing discriminatory behaviors from landlords, and it is up to

tenants to report discrimination so that fair housing laws can be enforced. It is important to ensure that recipients are aware of their rights and how to report potential violations.

Other Initiatives. ICHA is also implementing various homeownership and self-sufficiency initiatives throughout the City:

- **The Family Self-Sufficiency (FSS) Program** promotes self-sufficiency and asset development by providing supportive services to participants to increase their employability, increase the number of employed participants, and encourage saving through an escrow savings program. Many families have used their escrow accounts and private mortgages to attain homeownership independent of ICHA programs. In 2018, 177 participants were part of FSS, 90% of which had escrow accounts. The majority had increased their income versus the prior year. Fifty-nine FSS graduates have moved on to homeownership.
- **HCV Homeownership** permits eligible program participants the option of purchasing a home with their HCV assistance rather than renting. These initiatives have recently been paired with the production of affordable units. Forty HCVs have helped the purchase of homes since January 2003; 16 are currently active. A few past homeownership programs also assisted with homeownership in the past, including Tenant-to-Ownership Program (TOP), Affordable Dream Home Ownership Program (ADHOP), and down payment assistance program.
- **Cross Park Place.** ICHA and the Shelter House have collaborated to establish a new 24-unit Housing First Permanent Supportive Housing development for the chronically homeless. This approach provides housing without requiring supportive services, though services are made available. This is the first Housing First shelter in Iowa.
- **Equity Analyses.** In 2018, ICHA began racial equity analyses to determine 1) whether their briefing times are convenient to those who may receive HCV or public housing assistance and 2) if Limited English Proficiency (LEP) households are able to understand the materials that are presented at their briefing. ICHA is working to complete these analyses and develop implementable solutions, such as translating briefing materials into Spanish, French, Swahili, and Arabic.

Beneficiaries

Key characteristics of the head of households for participants from all ICHA programs across all ICHA's jurisdiction (and not just Iowa City) between November 1, 2017 and February 28, 2019 were as follows (out of a total of 1,384):

FIGURE 60: ICHA Beneficiary DATA

Category	#	%
Disabled and/or Elderly	762	55.1%
Disabled	516	37.3%
Elderly & Disabled	171	12.4%
Elderly	75	5.4%
Households with Children	746	53.9%
Female Head of Household with Children	501	36.2%
Race/Ethnicity	1,384	100.0%
White	692	50.0%
Black/African American	650	47.0%
Hispanic	55	4.0%
All Other Races	42	3.0%
One Person Households	678	49.0%
Working Households	678	49.0%

Source: ICHA Calendar Year 2018 Annual Report

Generally, protected and vulnerable populations are well-represented amongst ICHA program participants. From this it appears protected classes are generally not being denied the opportunity to participate in ICHA programs. However, the demand for public housing and HCVs exceed current supply.

Tenant Selection

HUD allows preferences to select participants in accordance with non-discrimination and equal opportunity requirements. ICHA may admit an applicant for participation in the program either as a waiting list admission or as a targeted admission. The date and time of application is used to determine the admission sequence for all applicants within specified preference categories. The bedroom size for which a family qualifies is an additional criterion used for Public Housing admissions.

Both HCV and Public Housing waiting lists are open and applications are received daily. Due to the total applications on file and new applications being sorted into all preference categories, ICHA does not anticipate exhausting applications that qualify for preference category B, as defined below. Application changes and updates are also processed daily, and applications are reviewed to ensure they are placed in the appropriate category. Application changes must be submitted in writing or through the HAPPY Software Assistance Connect system. Preference categories are as follows in order from first placed on waiting lists to last:

- A. Iowans displaced by government action or whose dwelling has been extensively damaged or destroyed as a result of a declared or otherwise formally recognized disaster.
- B. Families with children under the age of 18 or elderly or disabled families who are residents in the ICHA jurisdiction;
- C. Adult families (2 or more household members) with no children under 18 years of age who are residents in the ICHA jurisdiction;
- D. Elderly or disabled families who are not residents in the ICHA jurisdiction;
- E. Families with children under the age of 18 who are not residents in the ICHA jurisdiction;
- F. Adult families (2 or more household members) with no children under 18 years of age who are not residents in the ICHA jurisdiction;
- G. Single, non-elderly, non-disabled families with no children under the age of 18 years of age regardless of residency.

Targeted Admissions which only apply to the HCV program include:

- Families referred by Prelude Behavioral Services;
- Public housing tenants who have resided in their Public Housing unit longer than 1 year and whose total tenant payment is higher than \$499;
- Participating families when HOME Investment Funds received from the State of Iowa or City of Iowa City to provide Tenant-Based Rental Assistance is depleted; and/or
- Individuals referred by Shelter House for HUD funded Permanent Supportive Housing (e.g., Fairweather Lodge, Cross Park Place).

ICHA established residency preferences in 2006 due to low lease-up rates, increased staff time for processing applicants, and the rising costs of HCV participants exercising their portability rights. Residency is defined as having a legal domicile, as determined by state law, within ICHA's jurisdiction. Applicants who are working or who have been notified that they are hired to work in ICHA's service delivery area are treated as residents. The use of a residency preference may not have the purpose or effect of delaying or otherwise denying admission to the HCV program based on the race, color, ethnic origin, gender, religion, disability, or age of any member of an applicant family.

Waiting Lists

ICHA maintains separate waiting lists for its Public Housing and Voucher programs. Waiting lists are lengthy for each: nearly 9,692 applicants are requesting public housing and another 23,784 applicants are waiting on rental vouchers.

For the public housing waiting list, there were 472 applicants who were resident elderly or disabled households or resident families with children under the age of 18 as of February 2019. 9,220 additional applicants were on this list but in lower preference categories. At that same time, the HCV waiting list had 894 applicants who were resident elderly, disabled households or resident families with children under the age of 18. An additional 22,890 applicants were in lower preference categories. The long waiting list is one indication of the lack of affordably priced rental housing in the Iowa City metro area.

The HCV and Public Housing waiting lists share many characteristics because most applicants apply to both lists, creating duplication. Bedroom size is taken into consideration for Public Housing but not Vouchers. When a voucher/unit is available, ICHA draws applications by date and time of application, from the applicant pool in order of its preference categories. The following tables include characteristics of households on the waiting lists for HCV.

FIGURE 61: ICHA WAITING LISTS BY SELECTED CHARACTERISTICS (PRIMARY PREFERENCE CATEGORIES)

	Public Housing Applicants		Housing Choice Vouchers Applicants	
	#	%	#	%
Waiting List Total	472	100.0%	894	100.0%
Elderly	84	17.8%	109	12.2%
Disabled	249	52.8%	399	44.6%
Families with Minor Children	200	42.4%	502	56.2%
White Head of Household	221	46.8%	409	45.7%
Black Head of Household	211	44.7%	427	47.8%
Multiple races/none reported	28	5.9%	58	6.5%
All Other Races Head of Household	12	2.5%	19	2.1%
Hispanic Head of Household	32	6.8%	52	5.8%

Source: Iowa City Housing Authority, February 27, 2019

Public housing applicant households with disabled members comprise 53% of the waiting list for the primary preference criteria, followed by families with children at 42%. Black households represent the largest racial group at 45% of all applicants for public housing. For the HCV program, applicant households with disabled members comprise 45% of the waiting list for the primary preference criteria, followed by families with children at 56%. Black households represent the largest racial group at 48% of all applicants. The HCV waiting list is much longer and with a higher number of families; this speaks to the popularity of the flexible program and need for additional affordable rentals for families.

ICHA does not track demographic data for those below the few highest preference categories because the demand is high. This includes approximately 95% of public housing and 96% of HCV applicants. To ensure its policies are promoting fair housing choice and serving the populations most in need, as laid out in the City's Consolidated Plan, it is recommended that ICHA should update the analysis it conducted in 2015 regarding the characteristics of its beneficiaries and waitlists by protected characteristics.

Siting

The City's Public Housing units are low-density and scattered across the City to conform and blend into the existing neighborhood architecture. Overall, ICHA's occupancy was 91%. The following is the Iowa

City breakdown by planning district as of March 15, 2019. 67% of the units were occupied by households with minors.

FIGURE 62: PUBLIC HOUSING UNITS BY PLANNING DISTRICT

	Total Units		Total Occupied	
	#	%	#	%
Northeast	6	7.4%	6	100.0%
Central	7	8.6%	5	71.4%
Southeast	31	38.3%	29	93.5%
Southwest	3	3.7%	2	66.7%
South	34	42.0%	32	94.1%
Total	81	100.0%	74	91.4%

Source: Iowa City Housing Authority, CY2018 Annual Report

Overall, units are located throughout Iowa City, though the southeast and south districts contain the highest number of units. Five additional units will be added to the central district in 2019.

HCV recipients can live anywhere, though they must first live in ICHA's jurisdiction for one year before they can move to another jurisdiction with the voucher (i.e., port). Below is the Johnson County breakdown by city in 2018. Overall voucher utilization in Johnson County shows 55% were households without minor children. Iowa City contains the highest concentration of vouchers.

FIGURE 63: HOUSING CHOICE VOUCHERS BY CITY

	Total Population	% of JC Incorporated Population	Total Vouchers by City	% Total Voucher Utilization
Iowa City	67,862	50.0%	929	64.5%
Coralville	18,907	13.9%	229	15.9%
North Liberty	18,228	13.4%	126	8.7%
Tiffin	1,947	1.4%	8	0.0%
Other Johnson County Cities	4,847	4.2%	26	0.9%
Total JC Incorporated	114,558	100.0%		
JC Total Population	135,736			

Source: Iowa City Housing Authority, CY2018 Annual Report

Within Iowa City, vouchers are well-distributed City-wide. Approximately 56% of vouchers are in HUD's Low- and Moderate-Income (LMI) areas according to the most recent HUD income data from 2015, compared with approximately 67% of the population. Similarly, 53% of vouchers are in areas with more than the City average (24%) of nonwhite or Hispanic individuals, the same as for the total population. However, two block groups contain approximately 25% of all vouchers in Iowa City, while half of all vouchers are in six block groups. These include a split of both LMI/non-LMI areas and areas with higher and lower proportions of persons of color. This concentration of vouchers may suggest that voucher holders would benefit from additional assistance or encouragement to find housing in areas that do not have higher concentrations of LMI households or persons of color.

Accessibility

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 require that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, a PHA's administrative offices, application offices and other non-residential facilities must be accessible to persons with disabilities. The Uniform

Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible.

Due to the prioritization of senior and disabled households for its waiting lists, ICHA completed a Section 504 review. In total, more than two thirds of public housing units (39.5%) are accessible to persons with disabilities. These units are subject to regular physical inspections conducted by HUD. According to ICHA, this physical inspection process is evidence that these units meet UFAS standards and are, therefore, in compliance with the requirements of Section 504. Furthermore, there have been no findings by HUD regarding its needs assessment and transition plan.

Data provided by HUD shows that both ICHA's public housing and HCV program beneficiaries have a much higher percentage of residents with disabilities compared to the City-wide total of 7%. This makes sense given the City's preference categories and suggests that the City is affirmatively furthering fair housing choice in terms of creating housing that is accessible, even if accessibility in the private housing stock continues to be a challenge for those with disabilities.

Discussion

ICHA administers its programs to maximize occupancy and assist its highest priority tenants. Wait-list practices appear consistent and compliant with HUD rules. Voucher utilization remains high, suggesting tenants are generally able to find housing. Regardless, increased information can still be beneficial to pursuing other goals, such as reducing concentrations of poverty and promoting fair housing choice for protected classes. These may include:

- Sharing up-to-date information about facilities and services available in each neighborhood in which housing suitable to the needs of voucher recipients is available. These may include schools, day care, health, welfare, and other social service agencies, employment centers, and public transportation. This ensures that voucher holders have full information for their housing search. This could be done through partnerships with local agencies or other materials.
- Encouraging voucher holders to look for housing in neighborhoods that are not traditionally occupied by low-income groups. Support in this regard could consist of coordinated assistance with other groups who assist the search process and maintain names, addresses, units, and other data on rental developments in the region that may be available. Local agencies, the Continuum of Care, and other City Departments may be especially beneficial in this regard. Unfortunately, the high price of housing in certain neighborhoods make this an ongoing challenge.
- Continuing to provide clear information concerning housing rights and the steps they should take, including referring tenant questions concerning discrimination or alleged discrimination directly to the Human Rights office. ICHA and the Human Rights Commission should also continue to educate landlords and the public.

In addition, it is recommended that the ICHA regularly analyze its beneficiary and waitlist data to ensure its preferences do not discriminate based on protected characteristics and that it is serving the people most in need, as determined by the City's most recent Consolidated Plan. As such, the City should regularly update its equity analysis to identify if there are any disparate impacts.

Other Housing Programs

The City of Iowa City is dedicated to creating new affordable housing opportunities as part of its commitment to improve affordability, encourage a vibrant urban core, and foster healthy neighborhoods. Historically, federal funding sources such as CDBG, HOME, and Low Income Housing Tax Credits (LIHTC) supported most of the City's affordable housing efforts. However, it has recently increased its focus on affordable housing for low- and moderate-income (LMI) persons. As a result, there are now multiple sources of federal, state, and local funding assistance that support affordable housing in addition to ICHA programs, and these new local programs have significantly increased the number of affordable housing units completed and planned.

Federal Programs.

Annually, HUD awards CDBG and HOME funding to the City of Iowa City. These flexible federal entitlement grants can, in partnership with nonprofits and developers, help create affordable, decent housing for LMI persons, in addition to assisting with a variety of other community development needs. The City's Neighborhood & Development Services Department administers these funds. CDBG funds assist with a variety of public service, planning, infrastructure and public facility, housing, and economic development activities. HOME funds are used for housing initiatives including Community Housing Development Organization support, and the rehabilitation, acquisition, and new construction of affordable units for owners and renters. Both programs primarily serve LMI persons and households.

Over the past four fiscal years, \$2.9 million in CDBG and HOME has been awarded to support affordable housing efforts, which has assisted 39% of the City's new affordable units over that time. Most funding goes to rehabilitate or acquire rental housing units, though the City's owner-occupied housing rehabilitation program is another large component. Projects target homeownership assistance to those below 80% of the Area Median Income (AMI) and rental activities to those below 60% AMI, though in practice, most owner and rental beneficiaries are well below those targets. The following table lists households assisted by recently completed housing projects by race/ethnicity and housing tenure:

FIGURE 64: CDBG/HOME ASSISTED HOUSING PROJECTS

	Rental		Owner		Total	
	#	%	#	%	#	%
White (Non-Hispanic)	31	41.9%	54	73.0%	85	57.4%
Black (Non-Hispanic)	30	40.5%	10	13.5%	40	27.0%
Asian/Pacific Islander (Non-Hispanic)	0	0.0%	0	0.0%	0	0.0%
Other (Non-Hispanic)	1	1.4%	0	0.0%	1	0.7%
Two or More Races (Non-Hispanic)	7	9.5%	1	1.4%	8	5.4%
Hispanic/Latino	5	6.8%	9	12.2%	14	9.5%
Total	74	100.0%	74	100.0%	148	100.0%
Elderly/Disabled	21	28.4%	0	0.0%	21	14.2%

Source: IDIS project data, FY16-FY18

For projects completed in Fiscal Years 2016 through 2018, the City assisted 148 households through HOME- and CDBG-funded housing activities, evenly split between owner- and rental households. Of those projects, 77 were for rehabilitation, 43 provided direct homebuyer and rental assistance, and 28 consisted of acquisition. For renter households assisted, 42% were non-Hispanic white. Meanwhile, 57% of owner households assisted were non-Hispanic white. Overall, 43% of households assisted through CDBG/HOME housing projects were white, well below their proportion of the population. These proportions are similar for the 50 households assisted through CDBG/HOME projects completed through March 1 in FY19 (44% non-Hispanic white). In addition, 14% of beneficiaries were persons with

disabilities, approximately twice their proportion of the population. This suggests that CDBG/HOME projects successfully engage low-income persons of color and persons with disabilities. However, some groups such as non-Hispanic Asians, have not been assisted as often as other racial or ethnic groups based on their proportion of the population.

Local Programs.

The City also funds multiple local housing programs, many of which are new since the last AI. Historically, programs funded with local dollars have not tracked or required recipients to report the race/ethnicity of their beneficiaries. Local programs include the following:

- General Rehabilitation and Improvement Program (GRIP). GRIP provides 20-year low-interest loans to homeowners with incomes up to 110% AMI for home repairs or improvements. Supported by General Funds, GRIP is integral to the City's efforts to maintain and rehabilitate owner-occupied housing. GRIP is also useful when homeowners want to make improvements that are not eligible for federal funds such as finishing basements, adding additions, or building garages. As these funds are entirely loans, there is no period of affordability.
- UniverCity Neighborhood Partnership Program. UniverCity creates homeownership opportunities in neighborhoods near downtown Iowa City and the University of Iowa campus. Homes are purchased, rehabilitated, and then sold primarily to income qualified homebuyers under 140% AMI. A deed restriction ensures it remains owner-occupied. The compliance period has varied since the program's inception in 2011, but it is now set at 30 years. UniverCity is primarily supported by General Funds. The City has purchased 68 homes to date. Of homes sold and pending purchase, 19 went to households under 80% AMI, 39 were sold to homebuyers under 140% AMI, and 7 had no income qualification.
- [New] Residential Tax Increment Financing (TIF). TIF provides financial assistance for projects in designated urban renewal areas. For residential projects to receive TIF assistance, they must have 15% of units be affordable or provide a fee in lieu of units. Two recent projects required developers to sell 11 units to the City for affordable housing. Another project required 33 units to be affordable in perpetuity in addition to \$1 million directed to the City's Affordable Housing Fund. This is also discussed in the section on property taxes.
- [New] Affordable Housing Requirements. Beginning in 2016, new projects with more than ten units in the Riverfront Crossings (RFC) district must provide at least 10% of total units as affordable housing in exchange for increased density. Renter households under 60% AMI and homebuyers under 110% AMI are eligible for the units. The affordability period is 10 years. Alternatively, developers can provide fees in lieu of affordable units, though any funds generated must be used in the RFC district. To date, the requirement has only produced rental units. Similarly, the City adopted requirements in 2018 that annexations of residential developments resulting in the creation of 10 or more housing units have a goal of providing 10% of units as affordable for a period of 20 years or provide a fee in lieu of affordable units.
- [New] Affordable Housing Fund. Since FY17, the City has annually provided general funds for an Affordable Housing Fund. These contributions totaled \$1.65 million for FY17-18. 50% of funding is awarded to the Housing Trust Fund of Johnson County (HTFJC), 25% is used for land banking, 20% is directed to support LIHTC projects, and 5% is reserved for emergent situations.
 - HTFJC provides loans and grants for affordable housing projects in Johnson County. The contribution assists units in Iowa City. Projects must serve households under 80% AMI, but most projects target households below 50% AMI. HTFJC commonly funds projects that also use other affordable housing funding sources (like CDBG/HOME).
 - LIHTC projects can compete for matching funding. In FY18, the City allocated its first round of funding which will create 29 affordable rental units for households under 60%

- AMI (some units are targeted for lower incomes). The affordability period for these units is 30 years. The project is not yet complete.
- Land Banking dollars totaled \$461,000 in FY17 and FY18. The City has not purchased any land to date, but staff has identified one project and is evaluating other possible sites.
 - Emergent Situation funds were utilized in FY17 to assist with \$34,000 in tenant relocation expenses. Whatever balance remains at the end of the fiscal year is transferred to the land banking set-aside. The City anticipates utilizing these funds again in FY19 to assist mobile home park residents displaced for a new development by a private developer.

Discussion

The City has generally assisted more housing units through increased affordable housing programs despite decreasing federal funding for community development and housing programs. This shows strong local support for these programs, many of which will likely benefit protected classes based on the beneficiaries of recent CDBG/HOME housing projects.

In addition, the City's policies reflect perceived housing needs based on the survey. Of 203 respondents, 84% believed that housing people with lower incomes was most important, followed by first time homebuyer assistance (54%), housing for people with disabilities (53%), and housing for seniors (57%). Of these priorities, only programs for first-time homebuyer are not actively addressed, though CDBG/HOME is used to create affordable homeownership opportunities.

Many local programs do not require the same level of tracking and reporting regarding protected characteristics of beneficiaries. The City annually monitors many projects receiving local funding regarding rent and income levels of the units. In the future, it may be beneficial to begin tracking and reporting the race, ethnicity, or other protected characteristics of beneficiaries to ensure all City programs are affirmatively furthering fair housing.

In addition, the large number of new local programs, coupled with less flexible federal programs, creates a challenging regulatory environment with multiple, differing sets of rules. Approximately 49% of 161 survey respondents suggested that City funding practices may act as a barrier to affordable housing, the top response to that question. Furthermore, staff directing aspects of the programs, including other regulations affecting them, do not always communicate on a regular basis. The City's transition in 2015 from the Planning and Community Development Department to Neighborhood and Development Services Department has helped with issues of coordination. However, there are still additional opportunities to coordinate, streamline, and define the administration and planning of these programs that should be explored. For example, considering a centralized; regional waitlist for the City's affordable housing programs; moving applications and other processes online; reducing uncertainty for service providers in the fund allocation process; and harmonizing rules between programs to improve compliance with relevant regulations by private landlords while easing administrative burden.

Site Selection

Placement of new or rehabilitated housing for lower-income people is one of the more controversial issues communities face, whether new construction or acquisition of previously unassisted housing. State and local policies, practices, and decisions can influence the location of new publicly assisted housing and may act as a barrier to the placement of assisted housing. These may include local funding approval processes, zoning and land use laws, local approval of LIHTC applications, site selection policies, and donations of land and other municipal contributions. To achieve fair housing objectives, HUD sets a goal of avoiding concentrations of low- and moderate-income (LMI) housing.

To that end, HUD has regulations governing the selection of sites for certain HUD-assisted housing programs to meet these goals. The City strives to meet the spirit in providing or approving sites for all LMI housing developed in the community. The City actively considers ways to participate in cooperative, interjurisdictional planning for the construction of assisted housing.

Historically, the City has seen concentrations of LMI housing in certain neighborhoods. Current zoning and other policies and procedures appear to exert a relatively neutral effect on the existence of such concentrations. To address these concentrations, the City adopted policies and procedures to promote the placement of new housing for LMI households in a wider spectrum of neighborhoods.

Affordable Housing Location Model (AHLM)

The AHLM was developed in 2010 to clarify locations where the City would assist new affordable rental units in order to address the following goals:

1. Not further burdening neighborhoods and elementary schools that already have issues related to a concentration of poverty [*when Council has adopted subsequent ordinances furthering this goal, it has been reworded as “help achieve better socio-economic balance among Iowa City neighborhoods and among schools in the Iowa City Community School District”*];
2. Having diverse neighborhood in terms of a range of incomes; and
3. Determining the views of the Iowa City Community School District on the affordable housing issue.

The model applies only to new construction and acquisition of rental units outside of Riverfront Crossings; it does not apply to projects for the elderly or persons with disabilities, to the construction or acquisition of affordable owner-occupied housing, or to the rehabilitation of existing rental or owner-occupied housing. The City developed the AHLM to be consistent with HUD efforts to affirmatively further fair housing. While not directly tied to race, the AHLM is similar to HOME program requirements that place additional scrutiny on new construction rental housing projects in certain areas.

City Council comprehensively reviewed the model as part of its 2016 Affordable Housing Action Plan following such a recommendation in the previous AI. After a revision process, HCDC and Council unanimously adopted changes to the model in 2017 that more directly aligned the AHLM with Council's goals and simplified the criteria to: free and reduced lunch rates, distance from existing subsidized units, and areas with high levels of crime. This review reduced the size of AHLM-impacted areas in the City.

In 2018, HCDC inquired about the effect of the AHLM on protected classes, specifically, race/ethnicity. The most recent available block-level data suggests approximately one quarter of the City's population lives in AHLM-impacted areas. Compared to the City, these areas contain lower proportions of non-Hispanic white and Asian persons, and higher proportions of non-Hispanic black and Hispanic persons.

FIGURE 65: AFFORDABLE HOUSING LOCATION MODEL IMPACT BY RACE/ETHNICITY

Race/Ethnicity	Affected Blocks		All Blocks	
	#	%	#	%
White (Non-Hispanic)	11,768	70.9%	54,019	79.7%
Black (Non-Hispanic)	2,113	12.7%	3,805	5.6%
Asian/Pacific Islander (Non-	635	3.8%	4,674	6.9%
Other (Non-Hispanic)	81	0.5%	243	0.4%
Two or More Races (Non-Hispanic)	435	2.6%	1,403	2.1%
Hispanic/Latino	1,574	9.5%	3,624	5.3%
Total	16,606	100.0%	67,768	100.0%

Source: Census 2010 Block data (used because it is the most granular level of data available; Census Block Groups do not align well due to the granularity with which the AHLM is applied)

From FY16-FY18, the City assisted 148 households with CDBG/HOME funds. Households of color made up 43% of CDBG/HOME housing beneficiaries, nearly twice as high as their proportion of all LMI households (22%). This suggests CDBG/HOME projects are successful in marketing to households of color. For projects subject to the AHLM (rental acquisition projects), households of color were still assisted at a proportion higher than their proportion of LMI renters (27% to 25% respectively). This implies that the AHLM does not have a negative, disproportionate impact on households of color. Furthermore, almost all non-Hispanic white households assisted by HOME/CDBG funds used for acquisition were persons with disabilities. As such, the model may have the positive impact of shifting City assistance to other vulnerable populations that are exempt from the model, specifically persons with disabilities.

FIGURE 66: CDBG/HOME BENEFICIARIES BY RACE/ETHNICITY COMPARED TO LMI HOUSEHOLDS

	CDBG/HOME Housing Projects				Households Making <80% AMI			
	Rental Acquisition		Other Housing Projects		Renter		Total	
	#	%	#	%	#	%	#	%
White (Non-Hispanic)	19	73.1%	85	57.4%	9,395	75.1%	13,155	78.0%
Nonwhite or Hispanic	7	26.9%	65	42.6%	3,110	24.9%	3,715	22.0%
Total	26	100.0%	148	100.0%	12,505	100.0%	16,870	100.0%

Source: FY16-FY18 City of Iowa City data, 2015 CHAS data

Another 96 newly rental units were newly constructed and/or acquired through local City programs over that same period. These projects must also comply with the AHLM, though the City does not require recipients of local funding to track the race/ethnicity of its beneficiaries. For future monitoring, the City should require tracking of race/ethnicity to further allow a more complete picture of its impacts.

A different criticism of the model is that there is little undeveloped land zoned for multi-family uses outside of areas impacted by the AHLM. 14,520 acres are zoned in Iowa City, excluding rights-of-way, waterways, and redundant parcels. In total, 6,781 acres (47% of land) are zoned single family and 963 acres (7%) are zoned multi-family. Another 631 acres (4%) are zoned commercial or industrial but allow residential development. The remaining zones either do not allow residences or are zoned institutional (which may contain residential facilities like dorms, they are excluded from analysis due to lack of data).

Figure 67 shows the amount of land zoned for different uses by AHLM-impacted areas.

FIGURE 67: ZONED AREAS BY AFFORDABLE HOUSING LOCATION MODEL

	AHLM Impacted		All Zoned Areas	
	# Acres	%	# Acres	%
Single Family Residential Zones	1,716.7	40.4%	6,780.6	46.7%
Interim Development Res./Rural Res.	349.2	8.2%	1,673.2	11.5%
Multi-Family Residential Zones	261.9	6.2%	963.2	6.6%
Commercial/Industrial (Res. Allowed)	249.0	5.9%	630.5	4.3%
Commercial/Industrial (Res. Not	801.2	18.8%	2,263.9	15.6%
Institutional	1,225.3	28.8%	3,881.4	26.7%
Total	4,254.1	100.0%	14,519.6	100.0%

Source: City of Iowa City, obtained February 27, 2019; for a use to be allowed, it must be either permitted or provisional

Compared to all zoned areas, AHLM-impacted areas are more likely to be zoned for non-residential uses (48% compared to 42% overall) and multi-family/mixed uses (12% to 11% overall). However, AHLM-impacted areas are less likely to be zoned single family (40% to 47% overall) or for future residential development (8% to 12% overall). Because undeveloped areas are less likely and multi-family is more likely to be affected by the model, this suggests that it is most likely to affect the acquisition of existing housing for affordable rentals rather than new construction of rental units. Of course, rental projects for the elderly and persons with disabilities are excluded from the model. In addition, this does not account for land that may be annexed to the City which has its own affordable housing requirements. If affected by the model, this will force those developments to provide housing exempt from its dispersal requirements, which could include affordable ownership or senior/disabled rental opportunities.

Discussion

The previous AI suggested the AHLM may restrict the supply of affordable rental housing due to higher land prices of non-AHLM areas and NIMBYism. To offset cost differentials, the City made additional local funds for affordable housing available per its recommendation. This helped leverage LIHTC dollars in northeast Iowa City and new affordable units near downtown. In addition, the AHLM encouraged housing for seniors and persons with disabilities in AHLM-impacted areas, while avoiding disparate racial/ethnic impacts. As such, beneficiaries for which data is collected racially/ethnically mirrors the households it intends to serve. The City has also made efforts to educate the public about the benefits of affordable housing.

However, the AHLM does affect the new construction or acquisition of non-elderly/disabled rental properties in certain areas. The City should continue to monitor and discuss these policies with assisted housing providers to determine if they negatively affect the City's ability to promote greater variation in the location of lower-income housing in neighborhoods. In addition, there is a need to collect information on protected characteristics for locally funded programs as well to ensure the observed trends also apply to City-funded projects.

Neighborhood Investment & Opportunity

Neighborhood revitalization and the quality of services provided by local government can impact fair housing choice, particularly in LMI areas where those with protected characteristics may reside. These areas can receive less investment from the private market which can contribute to decline and may experience disparities in public services and amenities which impact the quality of communities. Inequalities can include disparity in maintenance or quality of physical infrastructure; differences in access to services; or variances in the provision of schools, social services, parks or transportation.

One method to improve fair housing choice is by encouraging a greater socioeconomic mix of residents in lower-income neighborhoods by enhancing services and facilities. Public investment in specific neighborhoods may include housing and community development spending, such as for public facilities, infrastructure, and services, or spending on amenities such as recreational facilities, libraries, and parks. Investments can attract a wider variety of households to these areas while improving housing and neighborhood conditions for current residents. Securing good services and facilities in neighborhoods can be paired with economic development efforts to create jobs and enhance business opportunities which buttress economic objectives with better overall living environments.

However, revitalization and investment in low- and moderate-income (LMI) areas can only successfully promote fair housing objectives if housing opportunities are preserved for LMI households that wish to remain in the area. Permanent displacement should be minimized. To the extent displacement occurs or current residents desire to relocate outside the area, housing opportunities should be made available in other neighborhoods, especially those without LMI or racial or ethnic concentrations, in addition to whatever opportunities are available to those displaced within the area. Those working on projects should involve neighborhood residents in the planning and implementation to ensure adequate representation of neighborhood residents and business interests.

Investment Strategy

As laid out in its Consolidated and Annual Action Plans, Iowa City is committed to serving the community, especially those most in need. This includes all low-income households, but households with very and extremely low incomes are priorities. The City also identifies persons with special needs as among those who face the greatest challenges and therefore receive high priority in the expenditure of funds, including at-risk children and youth, low income families, persons experiencing or threatened with homelessness, survivors of domestic violence, the elderly, and persons with disabilities. Based upon outreach efforts, the following community development and housing needs were determined to have a high priority and will continue to be an emphasis of CDBG and HOME funding:

Housing

- Non-student renter households making less than 50% AMI
- Persons and families at-risk for homelessness
- Owner-occupied housing units (elderly, small family, persons with disabilities)

Public Services, Facilities, and Improvements

- Homeless Services
- Transportation Services
- Child Care Services
- Mental Health
- Food Banks
- Domestic Violence (Per Housing and Community Development Commission on 10/30/2017)
- Facility improvements for structures which house public service providers

Neighborhood Revitalization: Housing

The City currently utilizes CDBG and HOME funds, as well as local funds, to provide owner-occupied housing rehabilitation programs for income eligible homeowners. The programs aim to keep residents in safe, decent homes as well as stabilize neighborhoods by reinvesting in the housing stock. Grants and loans are available for items such as energy efficiency, exterior repairs, residential accessibility, manufactured home repair, emergency assistance, and comprehensive rehabilitation. If the home is located within a targeted area, half of the project cost will be forgiven within five years. Targeted areas were developed based on the age and condition of housing, owner-occupancy rates, housing costs, and income levels of a neighborhood. The City is currently considering an expansion of the housing rehabilitation program for single family and duplex rentals.

The UniverCity Neighborhood Partnership also supports neighborhood revitalization near downtown to ensure that neighborhoods remain vital, safe, affordable and attractive places to live and work for both renters and homeowners. The City is currently developing initiatives to replicate the UniverCity Neighborhood Partnership's success in other areas of the community. The City plans to purchase, renovate and sell four units in the South District in order to provide affordable homeownership opportunities. In addition, the City's other housing assistance programs as discussed in earlier sections are crucial to revitalization goals, especially where it relates to improving the housing stock and preserving existing affordable housing.

Neighborhood Revitalization: Public Services and Amenities

The City of Iowa City strives to provide equal access to services to all residents including recreational facilities and programs, social service programs, parks, schools, roads, transportation, street lighting, trash collection, snow removal, street cleaning, crime prevention, and police protection activities. The City also works directly with neighborhood associations to provide resources, plan events, address concerns, and keep residents informed. There are currently over 20 active neighborhood associations as well as a Neighborhood Council made up of neighborhood representatives who provide input on new City initiatives that are being considered.

The City also provides public services funds to nonprofit agencies that primarily serve LMI households. In the past, this program, called Aid to Agencies, has supported agencies providing services to the homeless, victims of domestic violence, those struggling with substance abuse, the elderly, persons with disabilities, and other LMI persons in need. The City also helps agencies coordinate through groups such as the Local Homeless Coordinating Board and invests in LMI neighborhoods outside of downtown through park, infrastructure, and public facility improvements, which tend to have more persons with protected characteristics.

Finally, the City utilizes enforcement of its nuisance codes to ensure different areas of town are maintained at similar levels. In 2017, the City analyzed its code enforcement activities across the City to review if it equally enforced the code. By mapping addresses for where complaints were filed, the City hoped to identify areas to concentrate outreach and education, and possibly to identify gaps in service where more strategic interventions and advocacy may be needed. Overall, the analysis showed that complaints were made equally across the entire city, suggesting that outreach to all areas of the community without regard to geographic area should continue, and that enforcement was not overabundant or lacking in certain areas.

Neighborhood Perceptions

The Fair Housing Survey asked various questions about how residents felt about their neighborhood. Based on the survey, 92% of 223 respondents reported being somewhat or very satisfied with the neighborhood in which they live. In addition, more than half suggested that there is not another area in Iowa City where they would want to move. The most common qualities respondents liked about their neighborhood related to it being quiet, friendly, safe, in a good location (typically in terms of closeness to amenities), and with good neighbors. People also noted diversity and walkability as being beneficial. Below is the word cloud for the question:

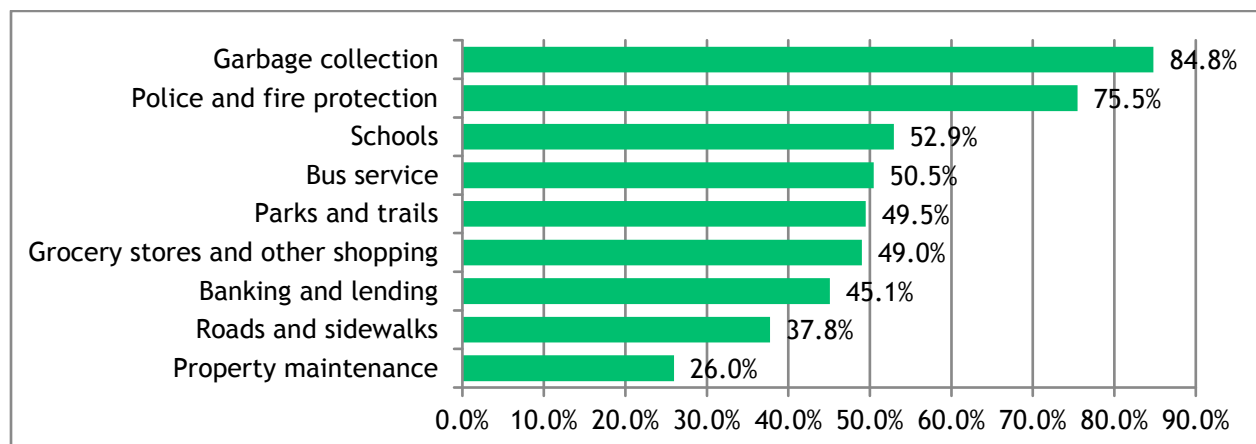
FIGURE 68: WHAT DO YOU LIKE BEST ABOUT YOUR NEIGHBORHOOD?



Source: 2018 Fair Housing Survey, 207 answered

Respondents were also asked about whether services were equally available in all areas. The majority believed garbage, protective services, schools, and bus service were equally available and maintained. Services rated the lowest in this question included property maintenance (with only 26% believe they were equally maintained) and roads/sidewalks. This suggests there continues to be room for improvement, especially in the enforcement of the housing code and ensuring timely repair of damaged streets and sidewalks.

FIGURE 69: DO YOU THINK EACH OF THE FOLLOWING ARE EQUALLY AVAILABLE AND KEPT UP IN ALL AREAS.

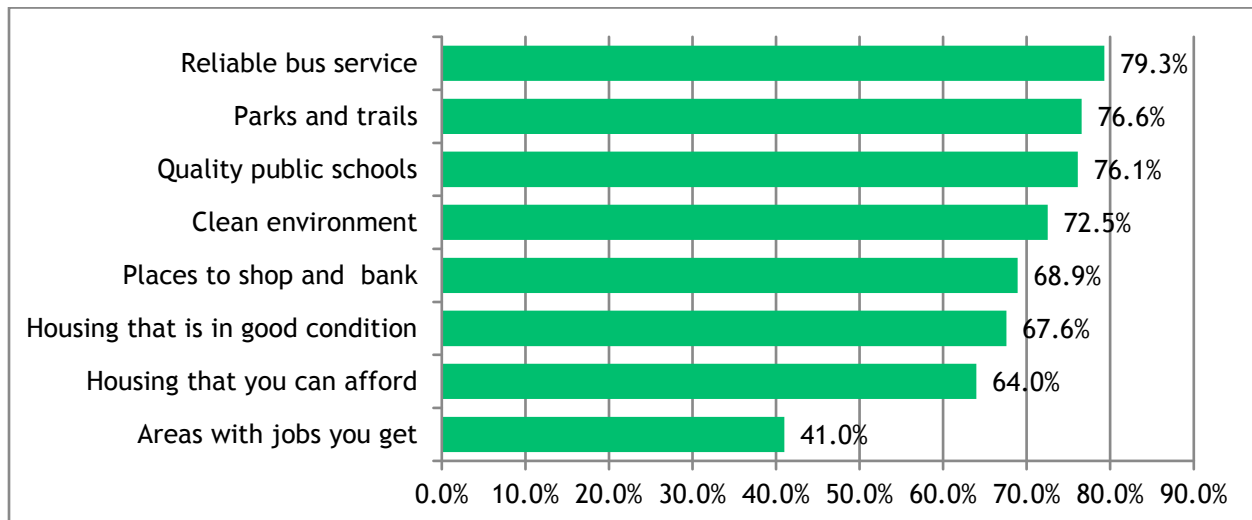


Source: 2018 Fair Housing Survey, 204 answered

Access to Opportunity

A person's place of residence and the locations of different opportunities can contribute to fair housing issues based on protected characteristics. Housing is part of a community, so an important component of fair housing planning is to assess how a person's place of residence, public and private investment choices, and public policies relating to schools, transportation, employment, environmental health, and community development may affect opportunity. An opportunity analysis can also help identify which individuals and groups with protected characteristics are most affected by a lack of, or inability to access, opportunity. In Iowa City, the majority of residents believed they had access to community resources, other than areas with jobs that are obtainable as shown below.

FIGURE 70: IN YOUR NEIGHBORHOOD, DO YOU HAVE ACCESS TO THE FOLLOWING COMMUNITY RESOURCES?



Source: 2018 Fair Housing Survey, 222 answered

HUD developed a series of indices to help inform communities about disparities in access to opportunity. These indicators do not capture all that is encompassed in an individual's or family's access to opportunity. However, they help quantify features of neighborhoods to assess whether significant disparities exist in the access or exposure of groups to these quality of life factors. All indices are ranked on a percentile scale from 0-100 where a higher percentile indicates a greater likelihood of positive characteristics within their neighborhood. For example, 100 for each index would respectively suggest for the neighborhood lower poverty rates, higher school proficiencies, higher labor market engagement, better access to transit, lower transportation costs, greater proximity to jobs, and better environmental health. See

Figure 71.

FIGURE 71: OPPORTUNITY INDICATORS, BY RACE/ETHNICITY

Iowa City	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Trans. Cost Index	Jobs Proximity Index	Env. Health Index
Total Population							
White, Non-Hispanic	64.5	41.8	84.5	83.6	79.4	48.8	58.1
Black, Non-Hispanic	54.7	29.7	86.6	81.1	77.8	43.8	69.1
Hispanic	57.9	34.4	84	81.6	77.5	48.4	65.4
Asian/Pacific Islander, Non-Hispanic	58	41.7	86.2	82	79.5	53	64.2
Native American, Non-Hispanic	62.7	40.8	87.3	84	79.1	43.5	60.7
Population below federal poverty line							
White, Non-Hispanic	65.8	42.4	78.6	89.1	86.1	51.8	41.8
Black, Non-Hispanic	50.4	35.4	91.5	80.2	78.5	48.5	73.6
Hispanic	54.9	29.6	84.3	83.4	79.6	46.3	60.2
Asian/Pacific Islander, Non-Hispanic	58.2	42.6	83.1	85.3	84.2	49.8	51.4
Native American, Non-Hispanic	80.4	57.7	41.5	85.3	85.7	82.7	26.4
Iowa City Region							
Total Population							
White, Non-Hispanic	70.3	49.4	85	60.8	64.4	46.9	72.9
Black, Non-Hispanic	60.4	37.8	88.5	75.6	75	40.5	70.4
Hispanic	63	41.5	82.9	66.3	67	45.1	72.6
Asian/Pacific Islander, Non-Hispanic	63.5	47.4	87.9	76.5	76.2	47.8	67.9
Native American, Non-Hispanic	69	46.3	86.4	62.7	66	39.3	72.8
Population below federal poverty line							
White, Non-Hispanic	65.5	44.9	79.4	76.8	76.8	52.9	52.7
Black, Non-Hispanic	54.3	40.4	93.1	80	78.1	52.3	69.1
Hispanic	58.8	39.1	82.2	69.3	68.9	52.5	67.2
Asian/Pacific Islander, Non-Hispanic	57	40.6	86.1	83.4	82.8	52.5	54
Native American, Non-Hispanic	70.8	53.2	62.8	84	84.5	77.1	39.6

Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Note: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Generally, Iowa City ranks best in labor market engagement, transit, and low transportation costs. These are measured as follows:

- **Labor Market Index.** Summarizes relative intensity of labor market engagement and human capital in a neighborhood, based upon the level of employment, labor force participation, and educational attainment. Values are ranked nationally. The higher the score, the higher the labor force participation and human capital in a neighborhood.
- **Transportation Cost Index.** Based on estimates of transportation costs for a 3-person single-parent family with income at 50% AMI for renters for the region. Values are ranked nationally. The higher the value, the lower the cost of transportation in that neighborhood.
- **Transit Trip Index.** Based on estimates of transit trips taken by a 3-person single-parent family with income at 50% AMI for renters for the region. Values are ranked nationally. The higher the value, the more likely residents in that neighborhood utilize public transit.

There is some variance by race for these categories, but they don't exceed a few points. For transit and low-cost transportation, the neighborhoods of populations below the federal poverty line have better ratings than for all Iowa City residents. Regarding the labor market for persons in poverty, neighborhoods in which white, Asian/Pacific Islander, and Native American households live score lower while neighborhoods with black and Hispanic households score higher. All groups in Iowa City score higher in transit and low-cost transportation compared to the region, which makes sense as an urban center. Labor market engagement for neighborhoods in the City tends to be lower however, other than those with Hispanic and Native American persons.

Iowa City neighborhoods rank lower in the school proficiency index and the jobs proximity index. These are measured as follows:

- **School Proficiency Index.** Uses school-level data on the performance of 4th grade students on state exams to describe whether neighborhoods have higher or lower performing elementary schools nearby. Values are ranked at the state level. The higher the score, the higher the school proficiency in a neighborhood.
- **Jobs Proximity Index.** Quantifies the accessibility of a residential neighborhood based on distance to job locations within a region. Values are ranked at the regional level. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.

For school proficiency, neighborhoods where households of color live score lower than those where whites live. The same is true regarding job proximity, though neighborhoods where Asian/Pacific Islander households live score higher. Neighborhoods with white, black, and Native American persons in poverty scored relatively higher for schools and job proximity compared to neighborhoods where those groups are not in poverty. This contrasts the experience for Hispanics, whereas neighborhoods with Asian persons is mixed. Compared to the region, Iowa City neighborhoods ranks better in terms of proximity to jobs but lower in terms of school proficiency.

While findings on job proximity reflects those in the survey, school proficiency does not align. Elementary schools where more than 50% of the student body received free and reduced lunch for the 2017-2018 school year had higher mobility rates and most had lower National Percentile Ranks for the Iowa Assessment 4th Grade compared to the District. Part of this is likely attributable to higher foreign born populations in Iowa City compared to the State, which makes testing an imperfect measure of proficiency. This also does not speak to educational growth over the school year or other factors affecting school quality. As such, it is difficult to say if this truly reflects less positive educational experiences. However, public input has suggested a strong need for more affordable childcare opportunities.

For low poverty index, neighborhoods where people of color live tend to rank less favorably than where white persons live; the opposite is true for environmental health.

- **Low Poverty Index.** Measures poverty in a neighborhood based on the poverty rate. Values are nationally ranked. The higher the score, the less poverty in a neighborhood.
- **Environmental Health Index.** Summarizes potential exposure to harmful toxins at a neighborhood level based on standardized EPA estimates of air quality carcinogenic, respiratory and neurological hazards. Values are ranked nationally. The higher the index, the less exposure to harmful toxins and the better the environmental quality of the neighborhood.

For neighborhoods of those below the poverty line, all races rank less favorably regarding environmental quality, other than the neighborhoods of black households which rank better. For those in poverty, black and Hispanic households experience less poverty in their neighborhoods, whereas all others experience more. Compared to the region, all groups in Iowa City are less likely to live in low poverty areas and areas with worse environmental quality.

Addressing disparities in access to opportunity should involve a balanced approach that provides for both strategic investment in areas that lack key opportunity indicators and works to open housing opportunities in areas with existing opportunity through effective mobility options and the preservation and development of affordable housing in high opportunity areas.

Discussion

Overall, this analysis suggests there may be some discrepancies in services and access to opportunity by race, income, and area. To some extent, disparate impacts is due to the clustering of racial and ethnic groups into certain Census Tracts. As stated earlier, this clustering is not a fair housing issue if it is by choice. However, it may be an issue if it is due to those areas are the only ones that households can afford. Regardless, it may be good to encourage protected classes to move to areas of opportunity in Iowa City while opportunities for all protected classes everywhere in Iowa City, or at least, informing them of the opportunities elsewhere while allowing them to choose.

Employment-Housing-Transportation Linkage

Iowa City makes more use of non-automotive transportation than most Cities in Iowa. Only 57% of the population drives a car, truck, or van alone to work, compared with 81% of Iowans. The remainder either carpool (9%), use public transportation (10%), walk or bike (20%), use other methods of transport (1%), or work from home (4%). Non-automotive forms of transportation are often more cost effective, and therefore offer access to those who choose not to drive, or who cannot drive due to disability or cost.

The Metropolitan Planning Organization of Johnson County (MPOJC) is the metropolitan planning organization for the Iowa City Urbanized Area. MPOJC recently completed Future Forward, the Long-range Transportation Plan through 2045, for Coralville, Iowa City, North Liberty, Tiffin University Heights, and portions of Johnson County. Among the many goals established by the MPOJC's plan are to:

- Support growth, innovation, job creation, and productivity;
- Enhance livability and create vibrant, appealing places that serve residents throughout their lives;
- Offer multi-modal transportation options that are affordable and accessible; and
- Provide access and opportunity for all people and all neighborhoods.

Households without a personal automobile may be at a disadvantage in accessing jobs and services, particularly if public transit is inadequate or absent and the City is not otherwise easily navigable. Without convenient access, employment is potentially at risk and their ability to remain housed is greatly impacted. The following sections examine the employment-housing-transportation linkage.

In addition, linking strategies to expand affordable housing in nontraditional areas with activities to create new or expanded job opportunities helps both lower-income families and improves local labor markets. Many areas of the country are experiencing labor shortages, including the kinds of jobs many low- and moderate-income persons could use to improve their economic status. By linking housing with employment, communities can improve their local labor supply.

Passenger Transportation

Metro area transit consists of buses and paratransit vehicles. Iowa City, Coralville, and the University of Iowa provide transit services and are coordinated to provide connectivity across jurisdictional boundaries. North Liberty began providing intra-city service in 2016. In 2014, the Iowa City metro provided 7.2 million rides. This represents a 20% growth in ridership over the past decade. As of 2016, the metro total ridership totaled 6.8 million rides. The metro area ranks 11th in the nation for the highest number of bus rides per capita. All Iowa City and Coralville buses include bike racks on standard route service.

In Iowa City, the primary service providers are Iowa City Transit, University of Iowa Cambus, and Johnson County SEATS:

- **Iowa City Transit** provides service on 17 regular routes from 6:00 am to 11:00 pm. Monday through Friday. Routes operate with 30-minute service during peak periods and hourly evening service is provided to the same general area using combined routes, from 6:30 pm to 11:00 pm. Saturday service operates hourly with service ending at 7:00 pm and there is no fixed route service on Sundays. The Downtown Iowa City Transit Interchange is the hub of the City transit operations. All regular routes arrive and depart there except one, allowing for coordinated transfers between buses. \$1.00 is the base fare, though an unlimited ride 31-day pass is \$32, and a ten-ride ticket is \$8.50. Children under five may ride free. K-12 aged children pay a 75¢ youth fare, or \$27 for a 31-day pass. Persons attending the University of Iowa or Kirkwood

Community College may pay for a \$100 student semester. Other deals include a monthly pass for University of Iowa faculty/staff (\$28), 50¢ fares for elderly persons during off peak hours and Saturday, free rides for eligible persons with disabilities and low-income elderly persons during off peak hours, and free transfers with Coralville Transit. The Downtown Transit Shuttle is also free fare. All fixed route buses are lift/ramp- equipped and demand responsive paratransit service is provided during fixed- route service hours, operated by Johnson County SEATS.

- **University of Iowa Cambus** provides service on 13 routes during the week, and four weekend routes Saturday and Sunday during the academic year. Cambus charges no fare to facilitate circulation throughout the University campus. Although designed for circulating students and employees around campus, Cambus is also open and free to the public. During the summer, service is approximately 75% of academic year service in terms of times; but the coverage area remains the same. The routes serve residence halls, University Hospitals, academic buildings, Iowa City, commuter parking lots, and other specific functions such as large University activity centers. During the academic year Cambus operates during daytime peak hours until 12:00 am. Weekend service operates between noon and 12:00 am. Cambus also operates a Safe Ride service on Friday and Saturday nights from midnight to 2:20 am. All fixed route buses are ramp/ lift equipped. Cambus operates a special paratransit system intended for University students and employees, but is also open to the public, operating on a demand responsive basis.
- **Johnson County SEATS:** Iowa City and Coralville Transit systems contract with Johnson County SEATS for provision of demand- responsive paratransit service. Johnson County SEATS provides scheduled service to rural Johnson County, and ADA service to the cities of Iowa City, Coralville, and University Heights. Paratransit service is available during the fixed- route service hours, as well as on Sundays from 8: 00 a m to 2:00 pm. To qualify for service, you must have a transportation disability that precludes you from utilizing fixed-route service. While all fixed- route buses are lift-equipped, SEATS is available to pick up and drop off passengers who are unable to, or are not mobile enough, to reach a standard bus stop.

THE FOLLOWING FOUR FIGURES ARE MAPS FROM THE MPOJC'S FUTURE FORWARD PLAN ILLUSTRATING TRANSIT COVERAGE AS COMPARED TO EXISTING COMMERCIAL AND INDUSTRIAL LAND USES (

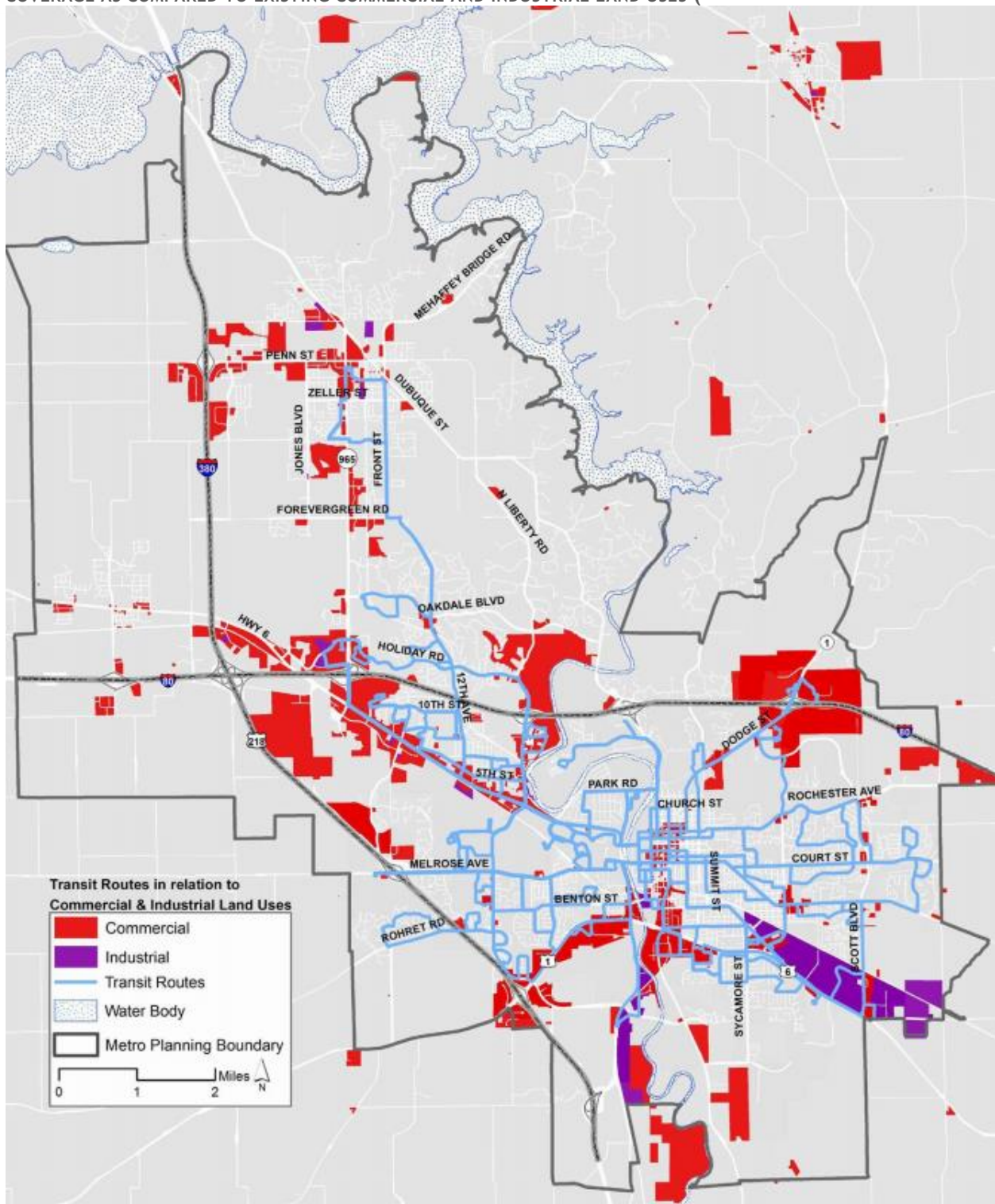


Figure 72); special needs and elderly housing locations (Figure 73); nonwhite populations by block group (Figure 74); and median household incomes by block group (Figure 75).

Generally, regional regular transit coverage is good, but coverage in Iowa City is excellent. Most employment areas are covered. This is reflected in the Fair Housing Survey where only 29% thought limited access to jobs was an issue in Iowa City. The City and surrounding jurisdictions also strive to link transportation and job creation initiatives with improved and more broadly distributed housing opportunities at the metropolitan or other regional level.

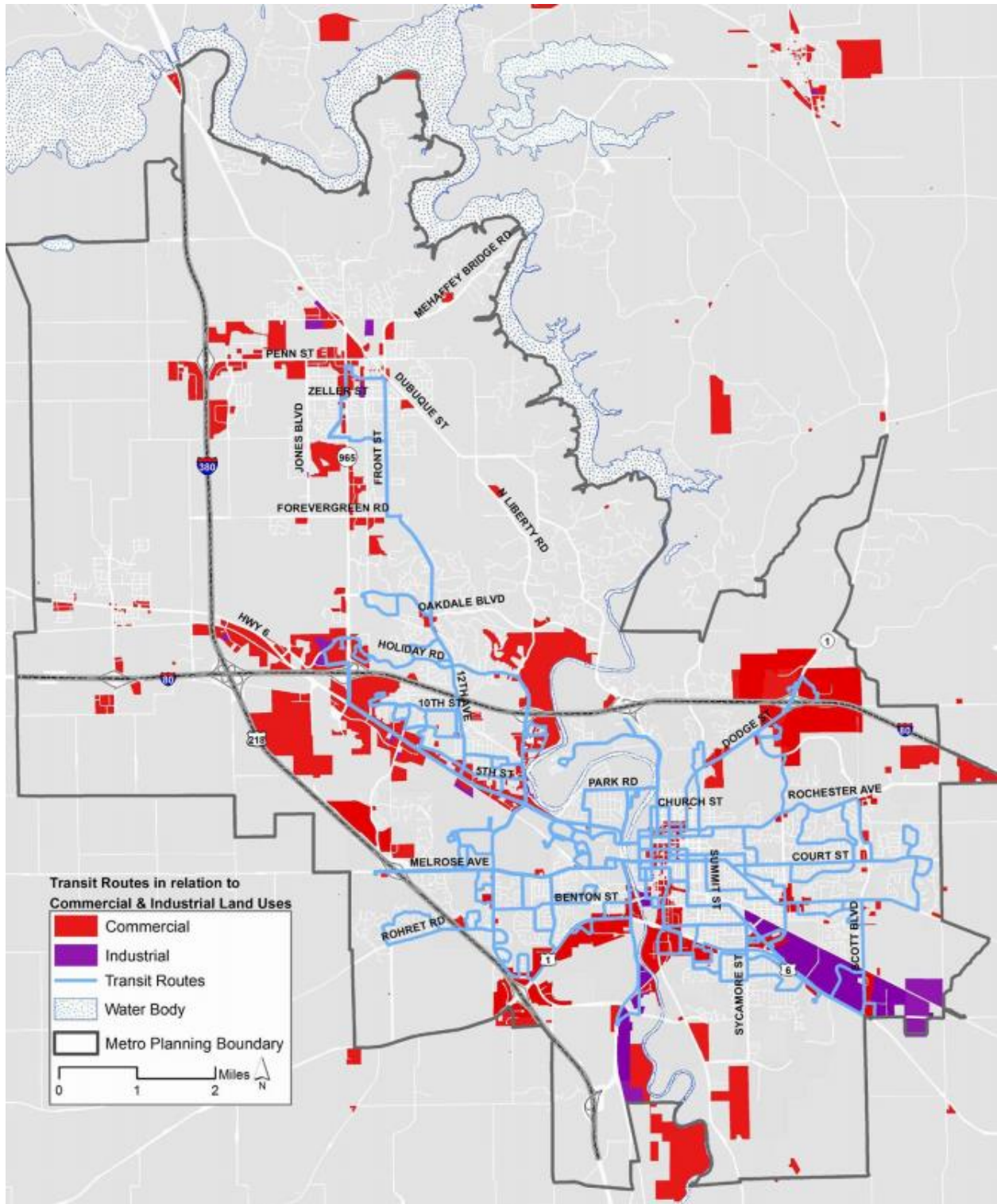


FIGURE 72: TRANSIT COVERAGE AS COMPARED TO THE EXISTING COMMERCIAL & INDUSTRIAL LAND USES

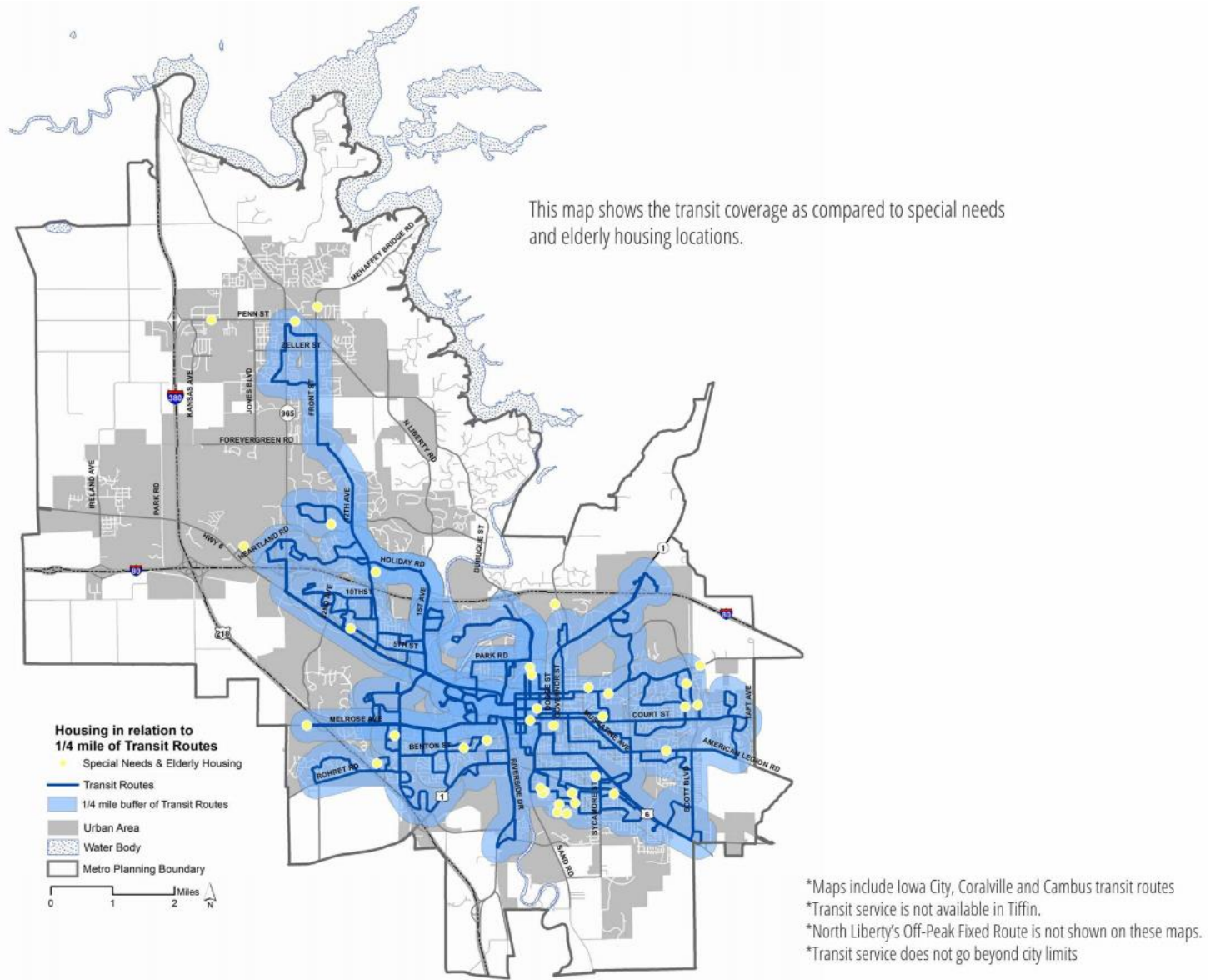


FIGURE 73: TRANSIT COVERAGE AS COMPARED TO SPECIAL NEEDS AND ELDERLY HOUSING LOCATIONS

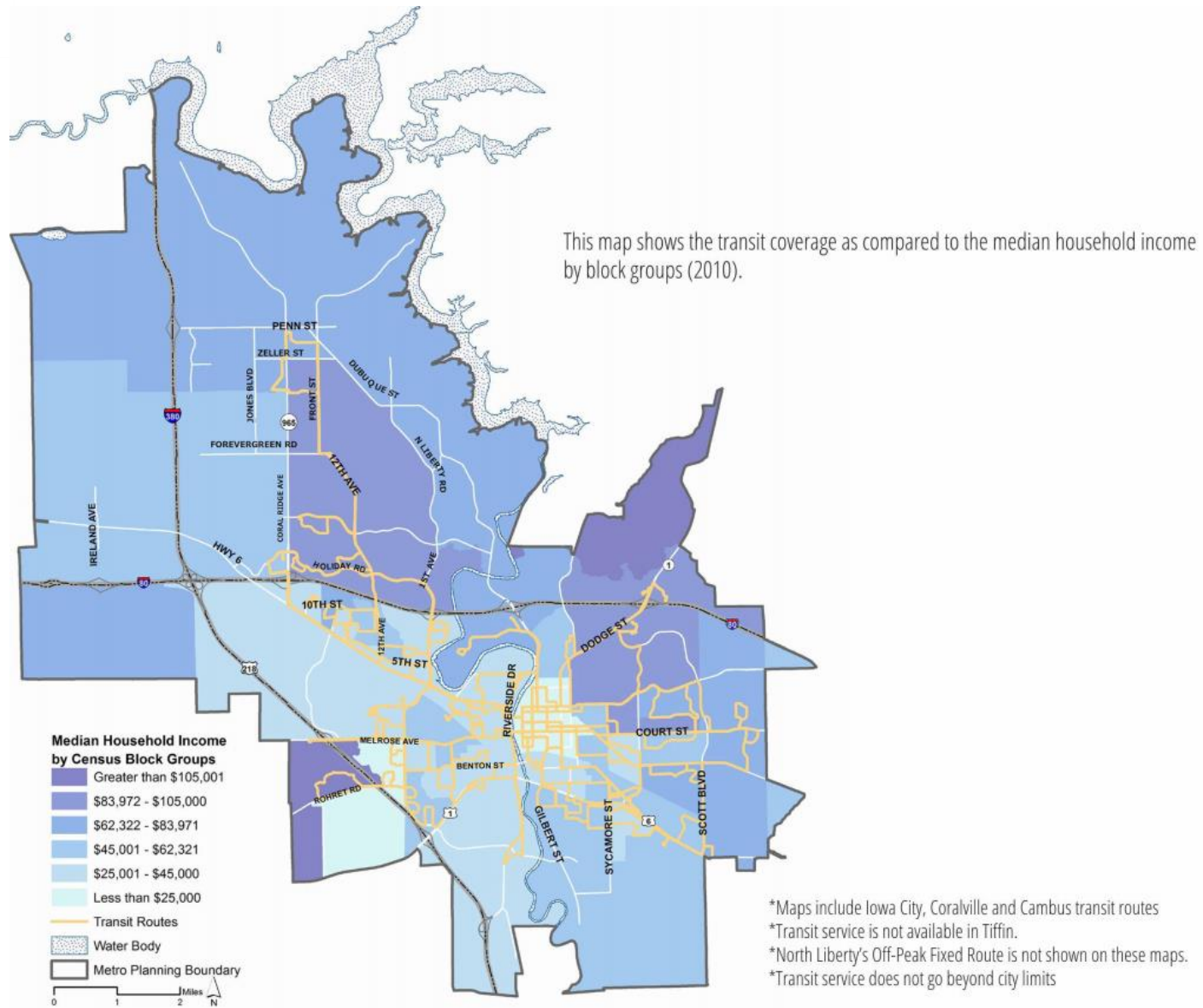


FIGURE 74: TRANSIT COVERAGE AS COMPARED TO PERCENT NONWHITE POPULATION BY BLOCK GROUPS

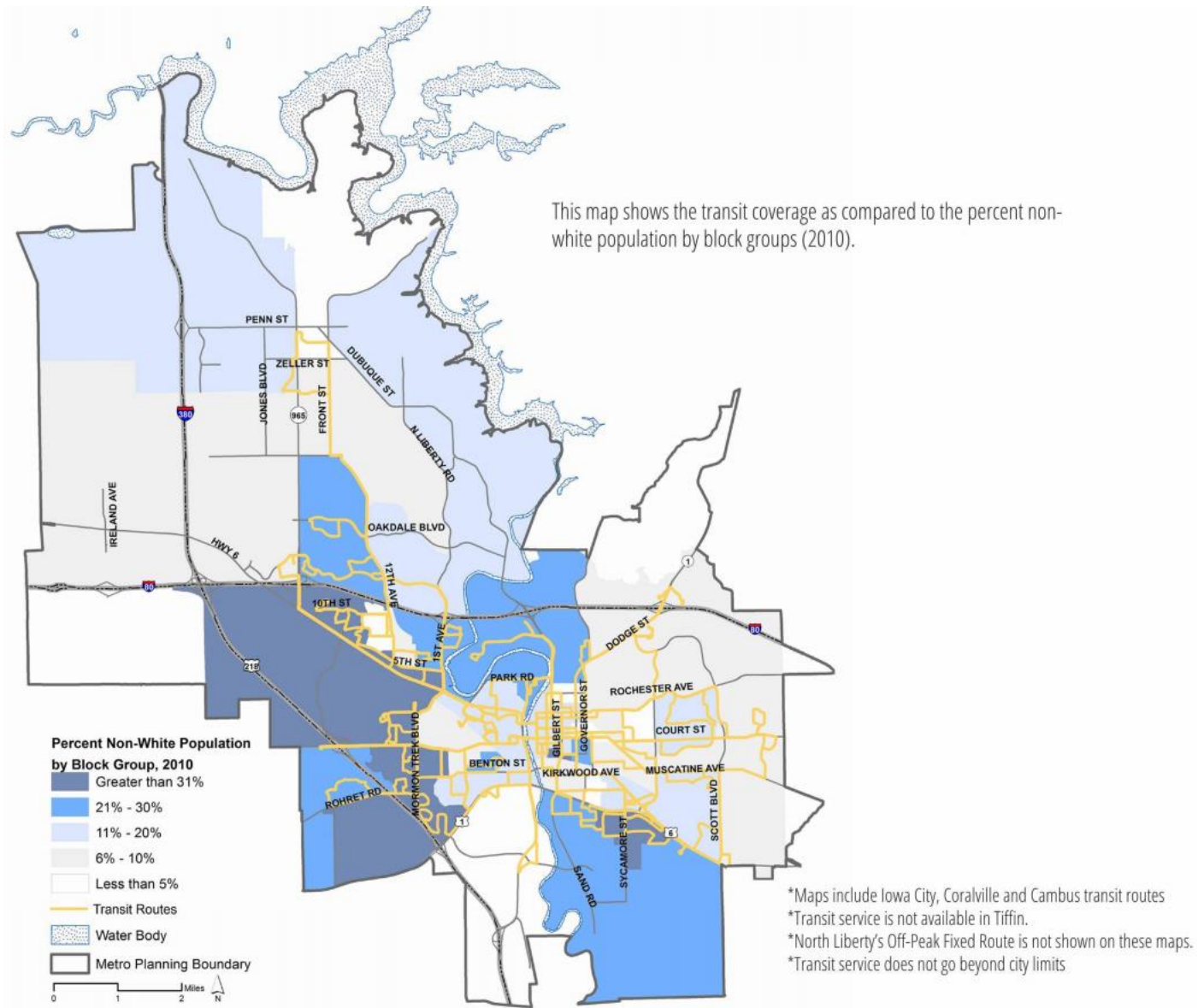


FIGURE 75: TRANSIT COVERAGE AS COMPARED TO THE MEDIAN HOUSEHOLD INCOME BY BLOCK GROUPS

However, Future Forward notes several challenges to passenger transportation:

- **Lack of funding:** Lack of funding is a barrier. This includes both for transit buses, facilities and capital projects, and service. In Iowa City, more than half of transit buses are operating beyond their useful life. Lack of funding for transit facilities, such as bus maintenance and storage facilities, is also an issue. Almost 88% of transit agencies in Iowa report a need for more vehicle storage capacity and 64% report a need for more maintenance space. Funding issues also affect bus service. The hourly cost to operate a fixed route transit bus increased dramatically, resulting in certain services being eliminated or never implemented. This has included Sunday transit service and planned programs targeting late night and weekend services.
- **Improving coordination with human services providers:** Johnson County is fortunate to have many social service options available. The need for transportation is very apparent for social service agencies. Even with existing efforts to bring human service organizations together to plan and coordinate transportation efforts, additional coordination is necessary.
- **Adjusting with more private transportation options:** Ridesharing companies such as Uber and Lyft have impacted local transit service efforts and budgets. Coordination with these programs will be necessary as the public trend toward transportation choice and need increases. These choices will become part of the transportation network in the urbanized area.
- **Avoid losing focus on passenger rail service:** Two separate passenger rail projects have been studied in the metro area, a local commuter passenger rail between Iowa City and Cedar Rapids and an Amtrak project between Iowa City and Chicago (to Des Moines and Omaha). There is local support for passenger rail service, but no financial support from state and federal sources.

As a result, some of the following goals are proposed in the Future Forward:

- Improve existing routes for jobs by extending late night routes, providing late night/weekend service, increasing frequency, providing real time information, and reevaluating routes; and
- Establish a Mobility Coordinator position to coordinate with human service providers;
- Continue to improve transit facilities and equipment, including bus shelters;
- Extend and create new transportation services such as passenger rail and Amtrak, initiating express bus service to Cedar Rapids, and supporting car sharing/pooling.

Transportation improvements such as these could improve employment opportunities for lower income persons who rely on public transit to access jobs, especially if they maintain a good coverage of areas of LMI and racial/ethnic concentrations. Promoting housing opportunities near employment areas can also lead to higher discretionary incomes for other expenses. There is a strong connection between housing and transportation costs; as working families move further from jobs to afford housing; they spend more of their income on transportation.

Active Transportation

Active transportation is any self-propelled, human-powered mode of transportation, such as walking or bicycling. Like public transportation, bicycle and pedestrian facilities create opportunities for people to promote health during travel. Active transportation facilities are particularly important in low-income communities, or communities with high percentages of new immigrants. People in those communities are less likely to own vehicles, and unsafe streets may be a barrier to active transportation.

The City has an existing bikeway system consisting of more than 85 miles of off-street trails and sidepaths and on-street bike lanes, marked and signed routes, and wide shoulders. In addition, most streets in Iowa City contain sidewalks, all of which speaks to a relatively well integrated system for active transportation. However, several challenges exist for the City's active transportation network:

- **Physical Obstacles:** The Iowa River and major roadways (I-80, I-380, Highways 1, 6, and 218) all present obstacles to providing a continuous bicycle network. Facilities or other accommodations that allow for safer, more accessible commuting between the east and west sides of the river across highways and busy intersections remain a challenge.
- **On-street bicycle facilities** and routes are an essential part of a complete and continuous bicycle network. However, the real and perceived safety of bicycling on the street remains an obstacle for achieving higher rates of bike commuting, especially among youth.
- **Seasonal maintenance** of on- and off-street remains a challenge for keeping the bicycle and pedestrian network open and safe throughout the year. This also varies by area in the City; only 38% of survey respondents believed roads and sidewalks were equally available and kept up.
- **Wayfinding** is consistently mentioned as an issue for bicyclists, especially in areas with gaps in the off-street trail network. A consistent and recognizable system of signage, distances, and identification of multi-use trails and on-street routes are essential for helping bicyclists and pedestrians to navigate the network.
- **Bicycle Parking:** Ensuring adequate and secure bicycle parking at major destinations, both public and private, as well as in areas of multi-family or mixed use development will help to encourage and enable bicycle ridership.

As a result, some of the following goals are proposed in the Future Forward plan:

- Reduce obstacles for non-motorized transportation, which includes compliance with Complete Streets policies, expanding bicycle and pedestrian facilities, and prioritizing ADA transitions;
- Improve bicycle and pedestrian safety by promoting education, raising awareness of drivers, evaluating unsafe areas, and designing appropriate facilities and Safe Routes to Schools; and
- Maximize pedestrian and bike access by improving access to employment opportunities and amenities, in addition to considering active transportation connectivity in development.

Like public transportation, active transportation is an important part of ensuring equal access from housing to jobs and other amenities. As such, it should be considered equally with public transportation. Figure 76 shows metro Iowa City's current bicycle network.

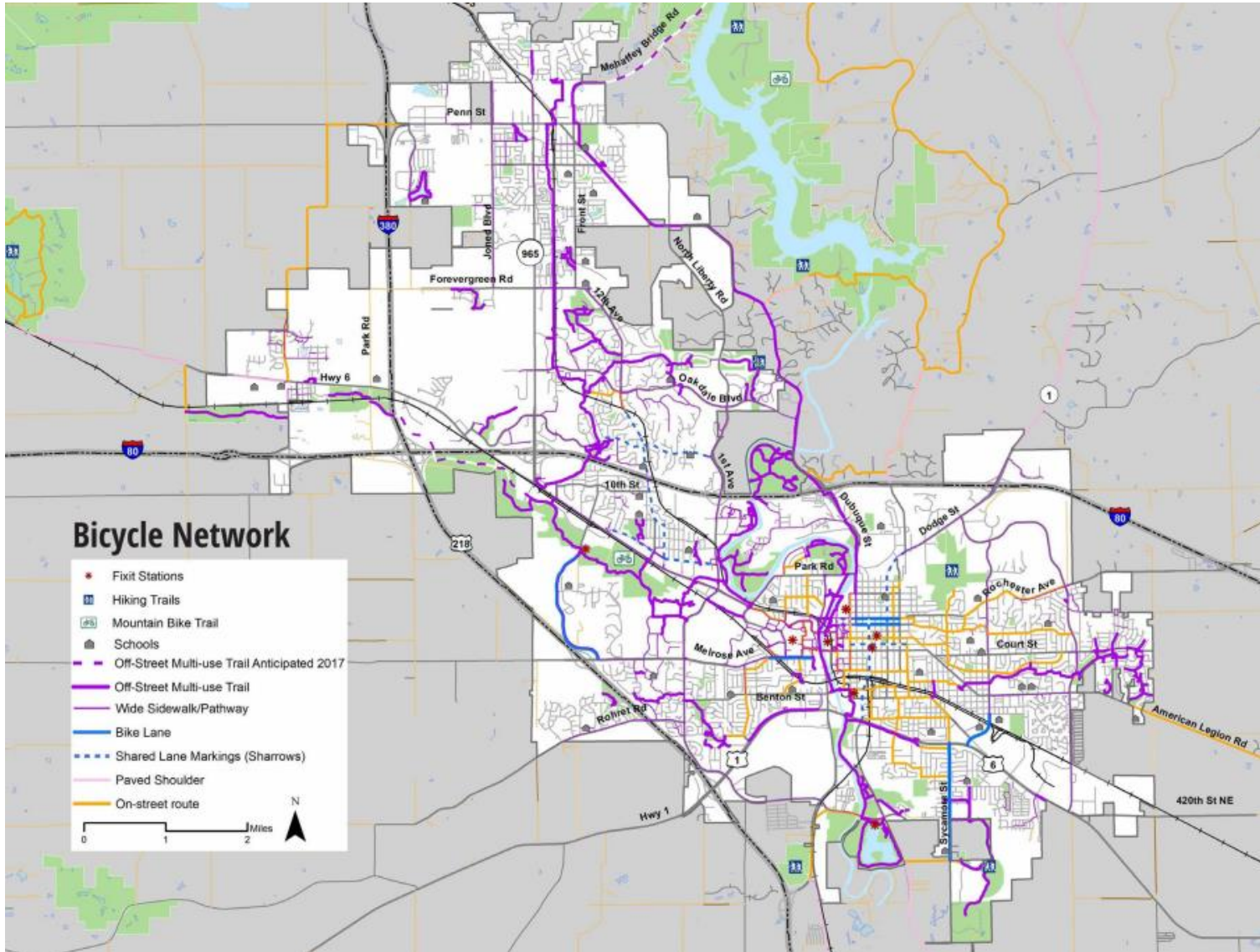


FIGURE 76: METRO IOWA CITY'S BICYCLE NETWORK

Loss of Affordable Housing and Displacement

The loss of existing affordable housing can limit housing choices and exacerbate fair housing issues affecting protected classes. Affordable housing may be lost due to deterioration, abandonment, or conversion to more expensive housing types, especially in areas experiencing economic improvement. Buildings can leave the affordable inventory through owner opt-outs of project-based Section 8 contracts, maturing long-term mortgages, and expiration of affordability agreements. Potential fair housing issues may include reduced access to areas with opportunity; displacement of protected class residents which may result in increased levels of segregation; a decrease in the availability of affordable units resulting in increasing housing issues; or disinvestment in neighborhoods.

Efforts to prevent loss of existing affordable housing may include funding and indirect subsidies for rehabilitation to maintain physical structures, refinancing, renewal and extension of affordable use agreements, conversion to alternative subsidy types, transfer of assistance to newer buildings or in alternative locations, and incentives for owners to maintain affordability. Similarly, efforts can include addressing backlogs of repairs and maintaining the infrastructure of existing affordable housing, such as through modernization or other improvements, if part of a concerted housing preservation and community revitalization effort designed to affirmatively further fair housing.

Preventing the loss of affordable housing is part of a balanced approach to affirmatively further fair housing. The objective is to preserve lower-income housing opportunities while providing other housing opportunities to displaced households. This includes providing a real choice to relocate to the same or different neighborhoods. Because relocation often places sole reliance on the provision of certificates or vouchers to displaced households, a good program to promote real choice in the use of certificates and vouchers is essential.

Displacement refers to a resident's undesired departure from a place where the resident has been living. This is often due to economic pressures which may include rising rents or property taxes, rehabilitation of existing structures, demolition of subsidized housing, loss of affordability restrictions, and public and private investments in neighborhoods. Such pressures can lead to loss of existing affordable housing in areas experiencing rapid economic growth which results in a loss of access to opportunity for lower income families that previously lived there. Where displacement disproportionately affects persons with protected characteristics, displacement may exacerbate patterns of residential segregation.

Loss of Affordable Housing

Based on CDBG/HOME contracts that the City monitors, at least 181 units will reach the end of their period of affordability over the next five years. This does not necessarily mean the loss of an affordable unit as many projects have other funding sources requiring longer periods of affordability (such as LIHTC), and many agencies monitored by the City, such as The Housing Fellowship, maintain their units as affordable after being released from affordable housing requirements. Often, they utilize other affordable housing funds to continue maintaining these properties, leading to renewed affordability periods. Only a small portion of expiring units are expected to return to market rate.

Regarding public housing units, there are currently no plans to sell any units, and in fact, ICHA will add units this year. This is partially due to increased emphasis on affordable housing in Iowa City, and because the current size of the federal public housing portfolio (81 units) is viewed as a good size to run an efficient program given HUD's maintenance funding mechanism. In the past when selling homes, ICHA has sold to existing tenants with a 15-year period of affordability. This has historically provided an alternative method to displacing tenant households.

Displacement

Any project being funded with City federal funds resulting in temporary relocation or permanent displacement of current tenants must comply with all requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA). This includes some of the City's rehabilitation, demolition or acquisition projects, though the City strives to avoid displacement and relocation to the greatest extent feasible.

Consequently, the City primarily experienced displacement through the loss of naturally occurring affordable private market housing rather than publicly assisted housing. This became a higher priority during the redevelopment of Rose Oaks, which raised concern that tenants, with short notice in some cases, did not have leases renewed and faced challenges finding alternative housing in a short timeframe. As a result, Council sought to address the impacts of tenant displacement in their 2016 Affordable Housing Action Plan.

At the time, major site plans in which more than 12 residential units were involved in construction or remodeling required notice to be posted on the property within 24 hours of receiving the application. In 2017, the code was amended to also require timely resident notice, more transparency with residents about the phasing of construction, and the creation of transition plans for residents. If there are any occupants on the date the application is submitted, it is now required that transition plans include the number of current occupants; a description of current contractual obligations between the owner and occupant(s); when any leasehold interest expires; and a construction timeline and phasing plan.

In addition, the following were added to the Comprehensive Plan in 2017:

- A goal to mitigate the impact of large-scale residential redevelopment;
- A goal to foster communication among owners, redevelopers and occupants to mitigate the impact of redeveloping existing residential properties; and
- A background statement including references to the City's several affordable housing related documents which provide the basis for affordable housing-related discussions, policies and legislation.

This reinforces the importance of affordable housing, services for those at risk of becoming homeless and increasing communication with existing residents in the Comprehensive Plan. This topic is also coming to a head with the acquisition of mobile home parks in Johnson County by out-of-state investment firms. Since acquiring the properties, they have increased lot rents dramatically which has displaced some tenants. The City and surrounding jurisdictions are currently discussing ways to mitigate the impacts to current tenants while preventing the future loss of affordable housing.

Discussion

Overall, loss of affordable housing is less of a fair housing issue in Iowa City. However, general affordability is an impediment, and loss of affordable housing works against it. Fortunately, most affordable units with expiring monitoring periods are expected to remain affordable due to the nature of the agencies that own them. They simply will no longer be subject to City monitoring and federal requirements. This provides additional flexibility to agencies. As such, ensuring that funds are awarded to responsible and capable agencies does much to offset the loss of affordable units, and the City should continue to support that goal.

On the other hand, displacement can be an impediment in Iowa City, especially as it relates to large scale redevelopment. As such, 64% of 2018 Fair Housing Choice Survey respondents noted displacement of residents due to rising housing costs as being a barrier to fair housing choice in Iowa City. So far, the

City has actively sought to avoid displacement through both informal encouragement and formal policy. In cases where residents are displaced, the City has requirements to try to ease the transition. This includes non-formalized policies such as using rezoning conditions to limit displacement to the greatest extent possible. (For example, requiring an Affordable Housing Agreement to accommodate displaced residents onsite in new affordable housing as part of a rezoning of Forest View Mobile Home Park for its redevelopment). The City should continue to strive for transparency and avoid displacement of low-income residents, especially those in protected classes

Property Tax Policies

Real estate property taxes are not a direct impediment to fair housing choice, but taxes impact housing affordability and influence housing choices. Tax increases due to rate changes or higher property assessments may be burdensome to low-income homeowners and are often passed on to renters through monthly rent costs. Since property taxes are levied without regard to a family's income, property taxes for lower-income families constitute a larger share of their income than for higher-income families, making them "regressive" taxes.

Real estate taxes levied on land and buildings provide the primary revenue streams for counties, municipalities, and school districts in Iowa. Local auditors establish the market value of each property and apply a "rollback" percentage based on the class of property to determine its taxable value. Taxing jurisdictions then levy different tax rates against this value. The primary taxing agencies in Iowa City include the Iowa City Community School District (ICCSA), City of Iowa City, and Johnson County. In FY18, the City levied 42.3% of property taxes, which decreased from a recent high of 44.0% in FY10. Meanwhile, the County levied 18.6% and ICCSA accounted for another 36.2% of property taxes. Other levies include the State and Kirkwood Community College. The City has decreased its levy rate every year for the past 7 years, which promotes affordability. Meanwhile, the taxable valuation of property subject to all levies in Iowa City increased 4.7% in the most recent budget for FY2020 due to increases in the taxable percentage of single family properties, new construction, and higher property values.

Tax forgiveness, delay, or other tax relief policies can help lower-income households. Homeownership programs can be part of an overall, comprehensive strategy to promote fair housing by preserving homeownership opportunities for groups like families of color and elderly homeowners who otherwise would have only rental options. Iowa's tax code provides several property tax relief policies through tax exemptions and credits which can benefit protected classes. It is the property owner's responsibility to apply for these. They include:

Homeowner Property Tax Relief. The Homestead Credit and Military Exemption are two of the most common exemptions taken by homeowners. The Homestead Exemption allows property owners to apply for a credit if the dwelling unit will be their primary residence. Properties approved by the assessor are also eligible for a Historic Property Rehabilitation tax exemption for up to four years if it meets the definition of "historic property". In addition, householders who are 65 and older or have a disability that meet low income requirements can apply for the Low-Income Tax Credit for the Elderly and Disabled. The difference in reduced taxes can be significant, particularly for lower income homeowners.

Mobile/Manufactured Tax Relief. Owners of mobile or manufactured homes in mobile home parks pay an annual tax based on the square footage of the home. Mobile home rates are reduced for low income households.

Rental Property Tax Relief. Renters indirectly pay property taxes as a portion of the rent and increases in property taxes on landlords are often passed on to tenants in the form of rent increases. Though the impact to landlords and tenants depends on market conditions. In slower markets, landlords are more likely to absorb the increase. As markets get tighter, the landlord may divide the increase with the tenant or passed it along entirely. Iowa City has a tighter rental market, which often allows landlords to pass property tax increases on to renters.

One recent property tax change is the reclassification of multi-family residential properties to which benefits owners of multi-family residential properties. Before 2013, multi-family properties were taxed at 100% of assessed value. However, the taxable percentage of multi-family properties has dropped since then, and now stands at 63.75%. After 2023, the taxable percentage of multi-family properties is intended to match the residential taxable percentage, which was 57% in 2018. Depending on market conditions, some of this decrease may be passed to renters.

Some rental units are exempt from property tax, which may benefit tenants. The Iowa Low-Rent Housing Exemption exempts property owned and operated or controlled by a nonprofit organization providing low-rent housing for persons at least 62 years old or persons with physical or mental disabilities. Residential properties owned and managed by a Community Housing Development Organization can also qualify for tax exemptions, as do many other assisted housing units in Iowa City, especially those built with HOME funds. Finally, low income renters who are 65 or older or totally disabled can also apply for the Low-Income Rent Reimbursement for the Elderly and Disabled which provides rent relief if their unit is in a taxable property.

Tax Incentives. Tax increment financing (TIF) is a mechanism to provide financial assistance for projects in designated urban renewal areas and TIF districts. The difference between taxes from unimproved, underdeveloped, or underutilized properties and those derived after its development, redevelopment, or expansion is the "increment" which may be pledged by the City to help finance project expenses such as public infrastructure or be forgivable loans or property tax rebates. The financing depends on the amount of new taxable property value added. Iowa City requires TIF projects with a residential component to provide at least 15% of the units as affordable, targeted to renters below 60% AMI or homebuyers below 110% AMI. The City may require a lower AMI for rental units. Developers may provide a fee-in-lieu of onsite affordable housing or to affordable housing elsewhere in the community. Cities may also use Iowa's Urban Revitalization Exemption, though Iowa City does not currently utilize at this time.

Overall, the City has property tax relief policies and provisions available locally and through the State tax code. Primarily, these policies and provisions are targeted to benefit lower-income homeowners, the elderly, and the disabled.

Fair Housing Enforcement and Education

The City promotes fair housing enforcement and outreach programs on a regular basis. However, the survey results suggest more work will need to be done as only 3% of those who felt discriminated against reported the discrimination. Survey participants listed feelings of helplessness, unfamiliarity, and fear as reasons they did not report incidents. The following two sections explore possible ways to continue furthering fair housing in Iowa City through enforcement and education.

Enforcement

The City's fair housing laws are comparable to the Fair Housing Act in addition to providing other protections. The City also has local mandates to construct affordable housing and site selection policies to help disperse affordable rental housing and avoid concentrations of poverty, though they only affect the addition of new affordable housing. To date, no court has determined that housing discrimination has occurred in the City's community development or housing programs, or the programs administered by Iowa City Housing Authority. Similarly, HUD has not made a finding of violations of the Fair Housing Act, Title VI, or Section 504, or regulations implementing these laws, in any federally funded housing or housing-related activities in the City. The City ensures that all appropriate officials and employees are aware of their responsibilities by sharing their Affirmative Marketing plan with relevant entities and monitoring for compliance. Responsibilities are also included in every signed agreement.

The City's fair housing enforcement program as described above currently appears appropriate. The structure and processes conform to HUD requirements and provide complainants and respondents an objective and fair process for pursuing and settling housing complaints. This includes recent changes which require quicker resolution of complaints due to the importance of housing, while still providing fair consideration of both the complainants and respondent. The City also requires reports regarding fair housing complaints from enforcement agencies and uses them in fair housing enforcement-related activities such as audits, education, and outreach.

The City may be able to improve its processes to ensure the public sees the process as timely and effective in obtaining relief. It should also do its best to actively monitor settlements, though this may not always be possible as they are not publicly available. These might minimize feelings of helplessness and provide certainty to complainants that filing reports in fact helps further fair housing in Iowa City.

In addition, fair housing testing can also assist with advancing fair housing. Testing refers to gathering information which may indicate whether a housing provider is complying with fair housing laws. It is recommended that the City explore testing to investigate third parties' awareness of fair housing laws. This could be done in partnership with other interested agencies and groups. An outcome would be the ability to better target informational campaigns and trainings.

Outreach

A lack of awareness about rights under fair housing and civil rights laws can lead to under-reporting of discrimination, failure to take advantage of remedies under the law, and the continuation of discriminatory practices. Based on the survey and discussions with local groups, this is an issue that affects Iowa City.

The City has a comprehensive set of fair housing activities year-round. The City has also implemented specific fair housing information programs for officials and employees having duties that have an impact on fair housing such as developing zoning policies, planning assisted housing, and community and economic development activities. These outreach, education, and information programs are designed to effectively create a good understanding among civic leaders, educators, and other citizens of all ages to reduce the adverse effects and force of negative attitudes among the community concerning people who are different racially, ethnically, culturally and who are disabled. Overall, these are relatively effective in increasing knowledge of the laws, reducing discriminatory behavior, and achieving fair housing choice in the community.

The City will continue to educate its officials and employees and the public regarding fair housing laws. However, it should explore developing new outreach, education, or information programs and activities to promote housing opportunities for focused segments of the community such as persons of color, those not fluent in English, and for the elderly and persons with disabilities. This should be done in cooperation with other organizations working on the common goal of furthering fair housing. The City should also broadcast the outcomes of previous complaints to help inspire confidence in the City's processes.

Another challenge in Iowa City is the high prevalence of foreign born populations with non-native English speakers. The City conducted a four-factor analysis per HUD guidance and maintains a Limited English Proficiency (LEP) plan to ensure LEP populations have equal access to knowledge of fair housing and City housing assistance. As a result, the City has translated some documents necessary to ensure meaningful access and offers oral interpretation when needed. It is recommended that the plan is reviewed again due to the rapid, recent increase of foreign born residents in Iowa City.

Private Sector

Most housing in Iowa City receives no government assistance of any kind, and as such, identifying private sector impediments to fair housing choice is integral to further fair housing in Iowa City. Under the broad term “private sector” are many specific aspects of the City’s housing market that should be examined to determine whether fair housing objectives are being served. This includes the following housing market issues and activities:

1. Banking and insurance policies and practices pertaining to the financing, sale, purchase, rehabilitation, and rent of housing that may affect the achievement of fair housing choice;
2. The sale and renting of housing and real estate practices; and
3. Availability of programs that may be used to provide financial assistance to modify privately owned housing to make it accessible to persons with disabilities and their families and dissemination of information about such programs.

Government policies and procedures that regulate, monitor, or otherwise impact rental, sales, and property insurance practices can play a significant role in promoting fair housing choice. Iowa City strives to review its policies and procedures in light of private sector practices to determine what, if any, changes might be made to strengthen their role where private sector practices appear to discriminate or otherwise contribute to restricted housing choice.

Residential Lending

Per Iowa City's Human Rights ordinance, a person whose business includes engaging in residential real estate related transactions shall not discriminate against a person in making a residential real estate related transaction available or in terms or conditions because of age, color, creed, disability, gender identity, marital status, familial status, national origin, race, religion, sex, sexual orientation, presence or absence of dependents or public assistance source of income. This includes those who make or purchase loans or provide other financial assistance to purchase, construct, improve, repair or maintain a dwelling. Based on conversations with the lending community, area banks pay careful attention to fair housing issues.

Historically, there have been mortgage lending and real estate appraisal practices that were openly discriminatory until relatively recently. Decisions as to property values, lending criteria, and related factors frequently rested on the race or ethnicity of the applicant or neighborhood. Lending policies and practices also treated applicants differently based on gender. While these practices are now illegal and largely gone, intentional or inadvertent discrimination may still result from systemic racism or a variety of other factors, some of which will not be detected in a fair housing review. Past studies show that subjectivity built into the loan process is a principal cause of discrimination in lending after controlling for objective indicators of applicant risk. This points to a need for lenders to evaluate their own policies and practices to identify how judgments are made in the lending process, including how lenders apply different terms for different applicants or neighborhoods.

Commercial lending institutions that make five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). HMDA regulations require most institutions involved in lending to report information on loans approved, denied, withdrawn, or incomplete by race, sex, and income of the applicant. This information helps identify possible discriminatory lending patterns and whether financial institutions are serving the housing needs of their communities.

Because protected classes may face higher loan costs or have lesser access to home loans, this section uses 2014 to 2017 HMDA data to analyze loan applicants by race, ethnicity, and gender data for the Iowa City Metropolitan Statistical Area (MSA) unless otherwise noted.

Loans by Type and Property

Between 2014 and 2017, 34,921 housing loan applications were reported in Iowa City for requested loans totaling nearly \$6.1 billion dollars. 86% of housing loan applications were approved, 7% denied, and 7% were either withdrawn, incomplete, or rejected by the applicant. Loan types include conventional mortgage loans and a variety of government-backed loans. Comparing these loan types helps identify if the less stringent underwriting standards and lower down payment requirements of government-backed loans expand homeownership opportunities. The four housing loans types include:

1. **Conventional loans:** not insured by the government;
2. **FHA loans:** insured by the Federal Housing Administration;
3. **VA loans.** insured by the Veterans Administration; and
4. **FSA/RHS:** insured by the Farm Service Agency or the Rural Housing Service.

Over that same time period, conventional loans comprised 91% of all loans, while FHA, VA, and FSA/RHS loans each made up 3%. Only 6% of all conventional loans were denied, which is a decrease since the last AI. Meanwhile, government-backed loans appear to be denied at higher rates of 24% for FHA loans, 15% for VA loans and 7% for FSA/RHS loans; these numbers have increased since the last AI, bucking the trend for conventional loans.

The purpose of loans also varied. Refinancing made up only 35% of housing loans, which is down from last the AI. Meanwhile, home purchase loans comprised a majority (60%) of housing loans. Home improvement loans made up only 5%. Denial rates for home purchase, refinance, and home improvement loans varied widely. Home improvement and refinancing loans are denied at a higher rate (between 12% and 15%), while home purchases are much lower. For home purchase denials specifically, 98% of loans were for one- to four-family structures. Manufactured housing and multi-family housing loans made up the remainder. These trends have remained relatively consistent over time.

FIGURE 77: APPLICATIONS FOR LOANS IN THE IOWA CITY MSA, 2014-2017

	Total Applications*		Approved		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	#	%	#	%	#	%	#	%	#	%
Total	34,921	100.0%	28,858	82.6%	1,315	3.8%	2,473	7.1%	2,275	6.5%
Loan Type										
Conventional	31,829	91.1%	26,625	83.7%	1,274	4.0%	2,008	6.3%	1,922	6.0%
FHA	1,044	3.0%	637	61.0%	15	1.4%	248	23.8%	144	13.8%
VA	887	2.5%	846	95.4%	15	1.7%	136	15.3%	164	18.5%
FSA/RHS	1,161	3.3%	750	64.6%	11	0.9%	81	7.0%	45	3.9%
Loan Purpose										
Home Improvement	1,767	5.1%	1,339	75.8%	76	4.3%	257	14.5%	95	5.4%
Home Purchase	20,777	59.5%	18,312	88.1%	840	4.0%	710	3.4%	915	4.4%
Refinancing	12,377	35.4%	9,207	74.4%	399	3.2%	1,506	12.2%	1,265	10.2%
Property Type: 1-4 unit Home Purchase										
One to four-family unit	20,248	97.5%	18,049	89.1%	801	4.0%	526	2.6%	872	4.3%
Multi-family dwelling	130	0.6%	109	83.8%	17	13.1%	1	0.8%	3	2.3%
Manufactured housing unit	399	1.9%	154	38.6%	22	5.5%	183	45.9%	40	10.0%

Note: Percentages in the Approved, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated according to the column.

Source: HMDA, AGGREGATE TABLE 4-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 20162016

Home Purchase Activity

This analysis focuses on homeowner mortgage applications for home purchase loans for one- to four-family dwellings in the Iowa City metro from 2014 to 2017. The information provided by race and sex includes both the primary applicant and co-applicants. The following table outlines HMDA data by applicant race, income, and sex, as well as by action taken on the application.

FIGURE 78: HMDA SUMMARY DATA -2014-2017

2014-2017 – Iowa City MSA, 1-4 unit home purchase	Total Applications*		Approved		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	#	%	#	%	#	%	#	%	#	%
Applicant Race										
American Indian/Alaska Native	23	0.1%	17	73.9%	2	8.7%	1	4.3%	3	13.0%
Asian/Pacific Islander	736	3.6%	643	87.4%	34	4.6%	23	3.1%	36	4.9%
Black	305	1.5%	239	78.4%	32	10.5%	15	4.9%	19	6.2%
White	14,722	72.7%	12,961	88.0%	632	4.3%	443	3.0%	686	4.7%
2 or More Nonwhite Races	9	0.0%	8	88.9%	0	0.0%	0	0.0%	1	11.1%
Joint (White/Nonwhite Race)	337	1.7%	294	87.2%	9	2.7%	5	1.5%	29	8.6%
Full Information Not Available	4,116	20.3%	3,887	94.4%	92	2.2%	39	0.9%	98	2.4%
Applicant Ethnicity										
Hispanic or Latino	388	1.9%	324	83.5%	4	1.0%	38	9.8%	22	5.7%
White, Non-Hispanic	14,285	70.6%	12,601	88.2%	625	4.4%	394	2.8%	665	4.7%
Other Race, Non-Hispanic	1,274	6.3%	1,086	85.2%	74	5.8%	41	3.2%	73	5.7%
Joint (Hispanic/non-Hispanic)	204	1.0%	179	87.7%	5	2.5%	9	4.4%	11	5.4%
Full Information Not Available	4,097	20.2%	3,859	94.2%	93	2.3%	44	1.1%	101	2.5%
Applicant Sex										
Male	4,008	19.8%	3,493	87.2%	164	4.1%	148	3.7%	203	5.1%
Female	3,076	15.2%	2,702	87.8%	135	4.4%	85	2.8%	154	5.0%
Joint (Male/Female)	8,879	43.9%	7,813	88.0%	402	4.5%	241	2.7%	423	4.8%
Same-Sex	461	2.3%	410	88.9%	16	3.5%	21	4.6%	14	3.0%
Full Information Not Available	3,824	18.9%	3,631	95.0%	84	2.2%	31	0.8%	78	2.0%
Total	20,248	100.0%	18,049	89.1%	801	4.0%	526	2.6%	872	4.3%

Note: Percentages in the Approved, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated according to the column.

Source: HMDA, AGGREGATE TABLE 4-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2016/2016

Some 20,248 mortgage applications were made for the purchase of a homes in Iowa City. About 20% of applications did not provide full race, ethnicity, or gender data for either the applicant or co-applicant. For groups with full data available, most applications were made by white households (91%), followed by Asian (5%), joint (2%), black (2%), and other households. In terms of ethnicity, non-Hispanic whites were again the majority (88%), followed by other non-Hispanic races (8%), Hispanic/Latinos (2%), and joint households (1%). Generally, non-Hispanic whites are overrepresented as a proportion of the population, while Asian, black, and Hispanic households are underrepresented based on available data, though these numbers mirror homeownership rates by race and ethnicity.

Banks approved 93% of mortgage applications submitted, 4% of which were not accepted by the applicant, such as in event of a better offer or interest rate from another lending institution, or other reason. The denial rate for all groups averaged 3%. Another 4% withdrew or failed to complete their application. Hispanic/Latino households were the most likely to be denied (10%), followed by black

households (5%), joint households (in terms of ethnicity at 4%), and Native American (4%). Non-Hispanic white households had a rate slightly above the average at 4%.

Regarding sex, 23% of applications did not include full information for applicants and co-applicants. For those who provided full information, most applications involved a male-female joint application (54%), followed by male (24%), then female (19%), and finally same-sex (3%). Male households had slightly higher rejection rates at 4% compared to female households, though same-sex households had the highest denial rate at 5%. This may warrant further study.

The 2014 AI found similar discrepancies in loan rates for black and Hispanic applicants. In 2017, the City hired the National Community Reinvestment Coalition (NCRC) - a nonprofit that works with community leaders and financial institutions to champion fairness in banking, housing, and business - to analyze HMDA data to ensure black and Hispanic households were not being illegally discriminated against by certain banks. Although their analysis confirmed that across the market there was a denial disparity between borrowers of color and whites that appears excessive, there is an overall low level of denials to all groups. Due to relatively small sample sizes, the NCRC report calls into question whether this is in fact a fair housing concern. Similarly, same-sex couples represent a small sample size, which can exacerbate issues in data collection. Regardless, the City should continue to monitor these trends and continue conducting education and outreach for lenders and borrowers.

Denial of Applications

Housing loans are denied by financial institutions for a variety of reasons. From 2014 through 2017, 526 (3%) conventional mortgage applications for 1- to 4- family homes were denied. Denial reasons were given for 261 of these applications. Reasons for denial included the following:

FIGURE 79: DENIAL REASONS FOR 1- TO 4- UNIT PROPERTY PURCHASES, 2014-2017

Reason	#	%
Debt-to-income ratio	68	26.1%
Collateral	65	24.9%
Credit application incomplete	35	13.4%
Credit history	35	13.4%
Other	30	11.5%
Employment history	10	3.8%
Unverifiable information	9	3.4%
Insufficient cash (down payment, closing costs)	7	2.7%
Mortgage insurance denied	2	0.8%

Source: HMDA Query

The general lack of information on conventional home-purchase denials makes it difficult to identify ways to improve the approval of loan applications. However, the prevalence of debt-to-income ratios being a barrier may create a possibility for lenders to work with borrowers by providing information on how to more effectively manage debt. Likely this will continue to be an issue as student loans increase in importance as a national issue. Similarly, lack of collateral, or issues related to credit or employment were also more common. All of these issues are related to objective criteria, making implicit discrimination to be less likely a cause.

Regarding areas with denials, Tract 104 by far has the highest denial rate of 5%, followed by 18.01 and 18.02 at 3%. Tract 104 has the highest proportion of non-Hispanic white populations in the City at 93%, and a poverty rate of 6%. Meanwhile, Tracts 18.01 and 18.02 have the lowest proportion of non-Hispanic white population in the City at 62% and 52% respectively and poverty rates of 17% and 19%

respectively. Overall, the spread between the highest and lowest denials is relatively small and does not appear to align with protected characteristics (such as areas of racial/ethnic concentration). This suggests that there is less connection between protected characteristics and loan denials by tract.

FIGURE 80: DENIALS BY CENSUS TRACT

Tract	Denials	Total Applications	Denial Rate
1	22	938	2.3%
4	21	916	2.3%
5	9	803	1.1%
6	3	125	2.4%
11	1	142	0.7%
12	4	286	1.4%
13	7	482	1.5%
14	18	793	2.3%
15	6	405	1.5%
16	3	133	2.3%
17	8	396	2.0%
18.01	22	640	3.4%
18.02	19	551	3.4%
21	0	26	0.0%
23	5	181	2.8%
104	20	372	5.4%
105	15	1,018	1.5%
Iowa City MSA	526	20,248	2.6%

Source: HMDA data query, 1-4 units, 2014-2017

Institutions with denials

For more specified detail by race and ethnicity, institutions that received at least 20 home purchase applications for one to four family dwellings (other than manufactured housing) from applicants of color were analyzed. Financial institutions with such few applications were considered too small a pool for analysis, even those analyzed may not be large enough samples, as discussed below. The following is a list of the 10 institutions that met the criteria with summary facts highlighting the key findings.

FIGURE 81: SELECT FINANCIAL INSTITUTIONS

	Total Denials	Total Loans	Denial Rate	Nonwhite Denial	White Denial	Hisp. Denial
Hills Bank & Trust (IA)	140	6,121	2.3%	2.4%	2.6%	12.1%
Iowa Bankers Mortgage Corp (IA)	64	1,285	5.0%	4.5%*	6.3%	13.3%*
US Bank, NA (OH)	34	446	7.6%	15.0%*	8.8%	0.0%*
Residential Mortgage Network (IA)	30	636	4.7%	16.7%*	4.1%	30.0%*
Wells Fargo Bank, NA (SD)	24	353	6.8%	12.9%*	6.5%	21.4%*
MidwestOne Bank (IA)	22	503	4.4%	0.0%*	5.0%	40.0%*
UICCU (IA)	21	5,927	0.4%	0.6%*	0.4%	0.8%*
CBI Bank & Trust (IA)	20	304	6.6%	5.0%*	7.2%	66.7%*
Collins CCU (IA)	6	293	2.0%	4.2%*	1.9%	0.0%*
Veridian CU (IA)	5	252	2.0%	0.0%*	2.5%	0.0%*
Grand Total	526	20,248	2.6%	2.3%	2.1%	9.8%

Source: HMDA data, 2014-2017, 1-4 units, home purchase

* 5 or fewer denials for persons of color

Some lenders denied applications from black, Asian/Pacific Islander, and Hispanic applicants at higher rates than the denial rates for white applicants, mirroring a previous finding in the 2014 AI. However, only one bank denied more than five applicants of color, which is a low enough number of denials to call into question any findings due to potential statistical error. This is compounded by a lack of access to the credit scores and credit histories of loan applicants.

Hills Bank & Trust was the only lender that denied more than five applicants of color. Their denial rate for nonwhite applicants was consistent with their overall denial rate, though their denial rate for Hispanic applicants was 12%. Hills Bank was more likely to have racial and ethnic minorities apply for loans compared to Iowa City, and they were almost equally likely to originate loans for Hispanic as they were for non-Hispanic applicants with origination rates of 86% for both. This suggests that the variance in denial rates is likely due to factors other than ethnicity. These results mirror a National Reinvestment Coalition (NCR) Study commissioned by the City regarding Hills. The report determined the bank's overall low level of denials to all groups did not indicate a fair housing issue.

Discussion

Private housing investments by financial institutions and other entities can help advance fair housing. Purchasing homes, in addition to investing in new construction or rehabilitation is especially important. Overall, this analysis of residential lending suggests that there is little evidence of discrimination in lending and investment based on race, ethnicity or gender. Based on 2018 Fair Housing Survey results, less than a quarter thought there was discrimination by mortgage lenders and only 15% believed that limited access to banking and financial services were barriers to fair housing choice. These were some of the lowest rated barriers in the survey. Blacks, Hispanics and Asians may have lesser access to residential lending than whites, though whether this is due to institutional discrimination, historical

factors, statistical error, or individual factors such as credit scores and credit histories is difficult to ascertain. Regardless, the City should be diligent in monitoring these observations.

It is recommended that the City should regularly monitor HMDA reports of financial institutions and develop policies to act upon this information. This may include incentivizing banks with good performance records by only depositing public funds in banks that meet threshold scores. Similarly, the City should regularly obtain information on the location of the properties that are the subject of approved and rejected home mortgage, home improvement, and commercial loan applications. This can help guide the City's lender education activities and promote fair housing throughout the community. The City should also continue to encourage education for borrowers regarding their fair housing rights and how to report violations of those rights.

The City should also continue to encourage lenders, appraisers, and private mortgage insurers to regularly examine and update their policies, procedures, and practices to avoid differential treatment of applicants based on protected characteristics. This could involve providing education to lenders regarding best practices and efforts to affirmatively further fair housing such as marketing the availability of mortgage and home improvement loans in targeted neighborhoods and to persons of color. It may also include encouraging lenders to examine their mortgage and home improvement loan profiles to determine whether there are neighborhoods or protected groups that are underrepresented or not represented in these profiles.

Real Estate

Those involved in real estate shall not deny another person access to, or membership or participation in a multiple listing service, real estate brokers' organization or other service, organization or facility relating to the business of selling or renting dwellings, or discriminate against a person in terms or conditions of access, membership or participation in such organization because of age, color, creed, disability, gender identity, marital status, familial status, national origin, race, religion, sex, sexual orientation, presence or absence of dependents, or public assistance source of income.

Because real estate brokers are often the first and most important contact with the potential homebuyer, the services they provide are critical in advancing, restricting, or denying fair housing choice. The broker can influence buyer considerations about the type and location of housing the buyer may find desirable, as well as provide key information about financing alternatives. This section also revisits special considerations regarding the ownership market.

Ownership Market

Iowa City's market for ownership is driven up by high demand and a strong economy. It is also impacted by development in surrounding areas, especially within the Urbanized Area which includes Coralville, North Liberty, Tiffin, and University Heights. This section strictly looks at housing demand and supply within Iowa City itself, based on the HUD Area Median Income (AMI), a measure of household income relative to household size. AMI is a useful measure to evaluate the supply and demand at different income levels, and it helps determine income limits and fair market rents for HUD programs. Households making less than 80% AMI (\$69,600 for family of four in FY19) are considered low income and less than 50% AMI (\$43,500 for a family of four in FY19) are considered very low income.

FIGURE 82: OWNERSHIP AFFORDABILITY (UNIT IS AFFORDABLE TO HOUSEHOLD MAKING EACH INCOME LEVEL)

Household Income Levels	Affordable Ownership Units by Income				Owner Households	Surplus (+)/ Deficit (-)
	Occupied Units w/ Mortgage	Occupied Units w/o Mortgage	Vacant Units	Total Units		
<=50% AMI	1,950	1,815	90	3,855	2,085	+1,770
>50-80% AMI	4,695	1,700	30	6,425	2,290	+4,135
>80-100% AMI	1,405	540	90	2,035	1,435	+600
>100% AMI	1,299	430	30	1,759	8,020	-6,261
Total	9,345	4,480	235	14,060	13,830	

Source: 2011-2015 CHAS

Note: Due to rounding within the dataset, numbers do not always add together.

Currently 3,855 units are affordable to those making less than 50% AMI, and another 6,425 units are affordable to those making less than 80% AMI. That means 10,280 (73%) ownership units are affordable to low income households, some of which is driven by properties without a mortgage. However, only 4,375 (32%) households living in owner-occupied units are low income. This suggests a surplus of affordable ownership properties, though most are occupied, often by households with higher income. Note that equity is an important part of housing costs, and the house would likely not remain affordable if the owner moved and a larger mortgage was needed; it also does not speak to turnover in the housing market (less expensive houses typically sell faster), which means there are effectively fewer affordable options for buyers. Meanwhile, there is a deficit of units for those making more than 100% AMI, i.e. more housing in that price range would be needed if housing costs and incomes were balanced. However, incomes and housing prices are not balanced, as evidenced by 16% of homeowners being cost burdened.

This suggests that the private market can continue to build homes that higher earners can afford, even as home values have risen. From 2018 to 2019, HUD’s definition of a modest new home price in Iowa City increased from \$228,000 to \$244,000. However, this data also supports the notion that homeownership can be an affordable, long-term housing option with enough equity. Unfortunately, many who desire to become homeowners have challenges with down payments that make housing costs affordable and make the transition to homeownership difficult. So, while there is a need for market-rate construction to continue in Iowa City, assisting new homebuyers to enter Iowa City’s real estate market may be a good long-term option for affordability.

FIGURE 83: OWNERSHIP HOUSEHOLD TYPES BY INCOME LEVELS

Household Income Levels	All	Household Type					Independent with Disabilities
		non-elderly non-family	elderly non-family ¹	elderly family ²	small family ³	large family ⁴	
<=30% AMI	950	465	225	80	165	15	290
>30-50% AMI	1,135	335	330	135	280	55	955
>50-80% AMI	2,290	620	445	360	710	160	825
>80% AMI	9,455	1,570	875	1,805	4,490	715	1,785
Total	13,830	2,990	1,875	2,380	5,645	945	3,855

¹Elderly Nonfamily = 1 or 2-person non-family households with either person 62 years or over

²Elderly Family = 2 persons, with either or both age 62 and over

³Small Family = 2 persons, neither person 62 years or over, or 3 or 4 persons

⁴Large Family = 5 or more persons

Source: 2011-2015 CHAS

Looking in the owner market at household types by income levels helps better relate housing affordability issues to fair housing issues. While homeowners are less likely to be low income, some 4,375 owner households are low income. The largest group of low-income homeowners in Iowa City are the elderly (36%), followed by non-family (32%), small family (26%), and large family (5%) households. Notably, independent persons with disabilities (up to three quarters of which may be seniors) comprise 47% of the low-income homeowner population. Overall, this may indicate a need for rehabilitation assistance for low income homeowners to ensure homes remain safe, sanitary, and decent, especially for those unable to do maintenance and rehabilitation work themselves.

Realtors

Iowa City Area Association of Realtors (ICAAR) is an association of real estate professionals who assist clients with home buying and selling needs. ICAAR’s mission is to serve the public, to ensure the ethical practices of its members and to provide leadership in the changing face of real estate. Affiliate members provide a variety of services and include lenders, home inspectors, appraisers, and those providing technology, insurance and restoration/cleaning services. ICAAR’s jurisdiction includes Johnson, Cedar and Washington Counties and parts of Linn, Iowa and Muscatine Counties.

ICAAR offers various programs and resources to elevate professional standards within the real estate sales industry. This includes education, training and legislative support to its membership. Realtors do not have required training on fair housing, but they are required to take 36 hours of education every three years, and fair housing-related classes are typically available. This leads realtors to have a general understanding of fair housing laws and issues. In the past relevant classes have included:

- The Housing First Model and Shelter House’s Cross Park Place
- All About Credit Restoration (helping clients who may not have the best credit still get approved)
- Preserving Dignity: Real Estate Issues in Fair Housing

Besides hosting classes, ICAAR encourages and markets fair housing and affordable housing education events hosted by other groups in the community. ICAAR was a sponsor for the Fair Housing Conference when it was hosted by the Housing Trust Fund of Johnson County, as well as the Affordable Housing Summit. In 2018 and 2019, ICAAR teamed up with the Home Builders Association and the Johnson County Livable Communities to host a six-part series on Aging in Place, which covers topics such as how to make sure a house is accessible for those who are disabled, as well as community resources for the aging community in Johnson County. In addition, ICAAR's Housing Opportunities and Public Relations Committee have completed projects including:

- Sponsoring Habitat for Humanity builds, which in Johnson County have often been for large families which face challenging in Iowa City's expensive housing market
- Fair Housing Public Service Announcement Project which works with high school student filmmakers to produce Fair Housing PSA's for scholarships. ICAAR plans on hosting this again next spring with college students as well.
- Hosting an Affordable Housing Bus Tour this fall
- Regularly inviting guest speakers attend meetings, such as representatives from the Johnson County Affordable Housing Coalition to present about the current issues with large corporations buying mobile home parks and increasing the costs of living.

In addition, ICAAR's MLS listing sheet includes a remarks section where accessibility features of a property can be described, April is recognized as Fair Housing Month, and the National Association of Realtors makes information and resources available on their website regarding the Fair Housing Act, the Fair Housing Incentives Program, and educational resources for realtors.

Finally, realtors utilize their code of ethics to promote fair housing. Their code was updated in 2014 to state they shall not deny professional services or be part of any agreement to discriminate against any person for reasons of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. When involved in the sale or lease of a residence, their Code states they shall not volunteer information regarding the racial, religious or ethnic composition of any neighborhood nor engage in any activity which may result in panic selling. However, realtors may provide other demographic information. When not directly involved, realtors may provide demographic information if it is needed to assist with or complete a real estate transaction or professional assignment and is obtained or derived from a recognized, reliable, independent, and impartial source.

ICAAR utilizes a "member-to-member" internal grievance procedure. Each year, ICAAR appoints a member to serve as an ombudsperson. Members are instructed to contact the designated ombudsperson to file a grievance. The designated member is required to participate in an ombudsman training program. According to ICAAR, this method of dealing with grievances has proven to be effective. ICAAR refers fair housing complaints to either the local landlord association or Iowa City Legal Aid.

Based on the 2018 fair housing survey, few respondents (5%) felt discriminated against by their real estate agents, though approximately 33% felt that discrimination or steering by real estate agents was a barrier to fair housing in Iowa City. However, these were not the highest barriers to fair housing choice identified in Iowa City. Through discussions with realtors, it also became apparent that a lack of homebuyer education was one of the largest fair housing issues experienced by homebuyers. Ensuring people were aware of their rights and educated about the duties and responsibilities of buying a home were stated as important goals.

Subdivision Covenants

Covenants recorded in deeds or placed in other documents which restrict purchase or occupancy based on protected characteristics are illegal and unenforceable, except in the limited situations specified under the Fair Housing Act.

Many new subdivisions in Iowa City have restrictive covenants running with the land, which often require owners to join the Homeowner's Association. As part of this, owners must pay membership fees or face a lien on the lot. Homeowners Associations typically oversee maintenance for areas of joint ownership, but they also often have additional requirements and/or regulations. Provisions of covenants in Iowa City include many different sorts of restrictions, some more common than others:

- Restricting uses to single family residential;
- Requiring a minimum garage capacity and total living area (ranging from 1,000-1,500 square feet for a one-story structure and 1,400-2,000 for a two-story structure)
- Creating maximum height and/or minimum setback requirements stricter than City Code requirements
- Limiting materials for exterior surfaces of the house, outbuildings, or fences, and even banning or restricting outbuildings completely
- Banning home businesses and signage that would be considered a nuisance to neighbors or entail more than occasional clients or customers
- Mandating landscaping and/or yard improvements such as trees, sods, and minimum yard maintenance.

Past research suggests these have the effect of increasing the price of purchasing and maintaining the home. Because many covenants impose design features that increase costs of construction and affect the uses of property, and because dues also add to housing costs, covenants may affect housing choice for protected classes in certain subdivisions in Iowa City. However, Iowa City's housing choice appears to be more impacted by other factors than restrictive covenants. There is also currently no evidence of restrictive covenants in the community that would exclude sale to or occupancy by a group of potential buyers based on protected characteristics.

Discussion

Based on relevant data and information, the primary fair housing issue regarding the ownership market that arose through conversations and data analysis was one of lack of education on the part of homebuyers. This included education about fair housing rights and how to spot steering, in addition to general homebuyer education for first time homebuyers. Otherwise, homeownership can create unique challenges for those less familiar with it, including long-term renters, which can compound other issues faced by low income households and those with protected characteristics. A need to continue to educate realtors about what constitutes fair housing violations is also important.

In addition, low income homeowners in Iowa City tend to be disabled and/or elderly. Fewer low income households tend to be families whether small or large. This suggests the City's practice of supporting homeowner rehabilitation for low income owners makes sense, especially for those who may need assistance to age in place and may not be able to do the work themselves. Continuing to invest in housing for those individuals can ensure their housing remains safe, decent and affordable. In addition, the fact that owner-occupied units tend to be affordable, providing down payment assistance may help renters who face an expensive market get a foothold on the property ladder and stabilize housing prices more than may be available in the rental market.

Rental Housing

It is illegal for landlords and property managers to discriminate against another person because of age, color, creed, disability, gender identity, marital status, familial status, national origin, race, religion, sex, sexual orientation, presence or absence of dependents or public assistance as a source of income. This is especially important in Iowa City where more than half of the City's housing stock is comprised of rentals, and nearly two thirds of renters are cost burdened. Much of this is due to the City's unusual demographic make-up with more than a third of the City's population enrolled in undergraduate, graduate, or professional school. This exacerbates the City's ongoing affordability challenges due to related issues which have been previously discussed:

- High demand for rental units, especially in the Pentacrest tracts
- Low incomes for students (77% of undergraduate and 44% of graduate/professional students have incomes below the poverty line)

These challenges are especially difficult for students in protected classes, and they intensify issues felt by others within the housing market. This section explores impediments to fair housing in Iowa City's rental market, including a look at both market rate and private assisted housing, in addition to a discussion about education related to the fair housing rights of tenants.

Rental Market

Iowa City's rental market comprises a majority of housing units in Iowa City and is driven by the high demand for student housing, particularly near the University of Iowa campus and downtown area. To a lesser extent, the rental market is also impacted by development in neighboring communities. The need for various types of affordable rental housing within the market is evident. This section strictly looks at housing demand and supply within Iowa City itself, based on HUD's AMI and FMR. AMI is a measure of an area's household income relative to household size, and it helps determine income limits and FMRs for HUD programs. FMRs are provided by HUD for the Iowa City area and are used as maximum rents for the HUD programs as well as payment standards for the Housing Choice Voucher program. Generally, they are considered the standard for affordable rent in an area.

FIGURE 84: RENTAL AFFORDABILITY (GROSS RENT IS AFFORDABLE TO HOUSEHOLD MAKING EACH INCOME LEVEL)

Household Income Levels	Affordable Rental Units by Income			Renter Households	Surplus (+)/ Deficit (-)
	Occupied Units	Vacant Units	Total Units		
<=30% AMI	1,520	60	1,580	6,735	-5,155
>30-50% AMI	6,959	175	7,134	3,075	+4,059
>50-80% AMI	5,195	15	5,210	2,680	+2,530
>80% AMI	1,475	15	1,490	2,665	-1,175
Total	15,155	265	15,420	15,155	

Source: 2011-2015 CHAS

Currently 1,580 units are affordable to those making less than 30% AMI, 7,134 to those making less than 50% AMI, and 5,210 units to those making less than 80% AMI. That means 13,924 (90%) rental units are affordable to low income households. However, 6,735 (44%) households living in rental units are making less than 30% AMI and another 3,075 (20%) renters make less than 50% AMI. This indicates a large deficit of affordable units for extremely low income households. Meanwhile, there is a surplus of units for those making more than 50% to 80% AMI, which are likely occupied by extremely low income households. This explains why 64% of renters are cost burdened. There is also a deficit of market rate rentals, suggesting higher earning renters are also occupying more affordable units when they could afford more expensive units.

Most vacant units currently exist at lower income levels. This may suggest that the most affordable housing is less desirable, so households are choosing more expensive housing for higher quality, better location, or other reasons. Many extremely low income households are also likely student renters who pay rent through loans or other funds not reflected as income. Overall, this supports deeper subsidy policies and the continuation of private market-rate developments.

FIGURE 85: RENTAL HOUSEHOLD TYPES BY INCOME LEVELS

Household Income Levels	All	Household Type					Independent with Disabilities
		non-elderly non-family	elderly non-family ¹	elderly family ²	small family ³	large family ⁴	
<=30% AMI	6,735	5,110	440	30	930	225	2,070
>30-50% AMI	3,075	2,010	290	15	645	115	735
>50-80% AMI	2,680	1,600	150	35	885	10	315
>80% AMI	2,665	1,420	140	50	940	115	420
Total	15,155	10,140	1,020	130	3,400	465	3,540

¹Elderly Nonfamily = 1 or 2-person non-family households with either person 62 years or over

²Elderly Family = 2 persons, with either or both age 62 and over

³Small Family = 2 persons, neither person 62 years or over, or 3 or 4 persons

⁴Large Family = 5 or more persons

Source: 2011-2015 CHAS

Looking in the rental market at household types by income levels helps better relate housing affordability issues to fair housing issues. Most households at income levels that have a deficit of affordable housing are non-family households who are not elderly (around 73%), which are likely student households within Iowa City. To a lesser extent, small families (16%), the elderly (8%), and large families (3%) are present in income levels with a deficit of affordable housing. However, there is a notable need for housing for independent persons with disabilities (up to quarter of which may be seniors) as they comprise 29% of the population experiencing a deficit of affordable housing. This suggests less of a need for affordable housing for large families, though the lack of current low-income large families in Iowa City may be a result of their inability to find affordable housing here in the first place.

Generally, rents have increased over time. As of October 2018, the FMR was \$684 for a 1-bedroom, \$902 for a 2-bedroom, and \$1,304 for a 3-bedroom unit. While this is down from the previous year, on average FMR has increased by between 2.6% and 3.0% annually since 1995 with larger units seeing rents increase more quickly than smaller units. This can provide an issue for larger families that are renters. The expensive rent can also make it difficult for renters to save down payments to transition to homeownership. This may support efforts to transition some renter households to homeownership through down payment assistance programs.

Privately-Owned Assisted Housing

In addition to the general rental market, there is a substantial amount of privately-owned assisted housing in Iowa City. This housing is owned and or managed by non-profit or for-profit organizations, but the housing must remain affordable due to the funding sources used to develop the housing units (This type of subsidized housing differs from housing that is administered by governmental entities such as public housing). Tenant selection requirements for privately-owned assisted housing vary, although all require tenants to be at or below a certain percentage of AMI, and some restrict occupancy to exclusively elderly or disabled households.

Financing for these affordable units typically comes from local, state and federal sources such as the Low-Income Housing Tax Credit Program (LIHTC); HUD's Section 202 (elderly), Section 811 (disabled), project-based Section 8, HOME, CDBG, and new local affordable housing and tax increment financing policies. Often these sources are combined in various way to leverage the maximum amount of funding assistance possible in order to make the project viable. Below is a list of private assisted housing in Iowa City currently under compliance periods.

The 1,323 affordable units address a significant need in the Iowa City Area, comprising approximately 4% of the 31,669 housing units in Iowa City. More than a third of these are for elderly and disabled populations. The number of privately-owned affordable units has steadily increased, though a direct comparison is difficult due to many projects receiving ongoing funding from a variety of sources. This often includes accepting households with Housing Choice Vouchers (HCV). However, HCV and other tenant-based rental assistance are not accepted for Project-Based Section 8 housing units. For those units that do accept tenant-based rental assistance, as many as 40% or 50% may contain voucher holders. Generally, there are not enough assisted units to truly address the affordable housing need in Iowa City, as evidenced by the deficits in housing units affordable to very and extremely low income households.

FIGURE 86: INVENTORY OF PRIVATELY-ASSISTED HOUSING UNITS, IOWA CITY - 2019

Development	Address	Affordable units	Total Units	Type
1301 Gilbert	1301 S Gilbert St	5	54	AHR
Aniston Village	1062 Chamberlain Dr	22	22	HOME/LIHTC
Autumn Park Apartments	913 Willow St	64	64	Project-Based Section
Berry Court	2160 Taylor Drive	14	14	LIHTC
Birch House	745 Pepper Dr	5	5	Section 202/811
Capitol House Apartments	320 S Dubuque St	81	81	Project-Based Section
CHARM Homes	Scattered Site	12	12	HOME
Citizen Building Apartments	319 E Washington St	18	18	LIHTC
Corridor Woods Limited	720 Foster Road	22	22	HOME/LIHTC
Diamond Senior Apartments	1030 William St	36	40	TIF
Ecumenical Towers	320 E Washington St	81	81	Section 202
Emerson Point	1355 Shannon Drive	54	54	LIHTC
Hawkeye Area Community	Scattered Site	28	28	HOME
Iowa City IHA Senior Housing	1259 Shannon Dr	30	30	HOME/LIHTC
Isis Investments	Scattered Site	9	9	HOME/CDBG
Lexington Place	1229 Shannon Drive	30	30	HOME/LIHTC
Mayor's Youth Empowerment	Scattered Site	26	26	HOME/CDBG
Melrose Ridge	4435 Melrose Avenue	18	18	HOME/LIHTC
Orchard Court Lofts	627 Orchard Ct	5	45	AHR
Pheasant Ridge Apartments	2626 Bartelt Rd	231	248	Project-Based Section
Prelude	436 Southgate Ave	12	12	HOME/CDBG
Reach for Your Potential	Scattered Site	4	4	HTFJC
Regency Heights Senior II	1060 Scott Park Dr	38	38	HOME/LIHTC
Regency Heights Senior	1010 Scott Park Dr	36	37	HOME/LIHTC
Riverside West	629 S. Riverside	12	96	TIF
Shelter House	Scattered Site	30	30	HOME/CDBG
Southgate Walden Ridge	Scattered Site	26	40	CDBG
Successful Living	Scattered Site	14	14	HOME
Systems Unlimited Scattered	Scattered Site	61	91	Section 202/811,
The Housing Fellowship	Scattered Site	106	106	HOME/CDBG
The Rise	435 S Linn St	33	332	AHR
United Action for Youth	1221-1231	3	3	HOME
Villa Garden Apartments	861 Cross Park Ave	48	48	LIHTC
Whispering Garden	2417 Whispering	12	12	HOME/LIHTC
Wittig Rentals	1131 3rd Ave	16	16	CDBG
Total		1,323	1,780	

Sources: City of Iowa City, IFA HOME data, HTFJC, HUD LIHTC and project-based section 8 data

Landlords and Discrimination

In the 2018 Fair Housing Choice Survey, 47 respondents cited property managers and/or landlords as those they felt had discriminated against them (75%). In addition, 58% of respondents felt that discrimination by landlords or rental agents were a barrier to fair housing choice in Iowa City, especially as it relates to protections for those with Housing Choice Vouchers (HCVs). This suggests that landlords may need additional educational opportunities to understand what fair housing is, how it applies to tenants, and what are best practices for ensuring equity through the rental process.

Similarly, tenants also need additional education, including a broad knowledge of legal protections for renters, such as for HCV recipients and freedom from reprisals. This should better allow tenants to be aware of possible signs of illegal discrimination (such as turning away families with children), to stand up for their rights, and to be more familiar with the City's fair housing complaint process in the event they are being discriminated against. Partnerships will be key in this process, including outreach with groups at the University of Iowa, Iowa Legal Aid, and other active nonprofit and community groups representing low income and diverse populations.

Discussion

Based on discussions and data analysis, the primary fair housing issue facing Iowa City's rental market appears to be the mismatch between cost of housing and incomes, which can limit access to opportunity due to high housing costs. In fact, lack of affordable rentals was listed as three of the five highest cited barriers to fair housing choice in the 2018 Fair Housing Survey. High housing costs can negatively affect a household's ability to afford other basic needs or require them to make a choice between necessities. Transportation costs, access to employment, and access to schools and other amenities can also impact housing choice and affordability.

In addition, ensuring there is an availability of affordable units in a wide range of sizes and types is essential to meeting the needs of individuals with protected characteristics who are disproportionately represented in low-income categories. Individuals with disabilities may need accessible housing or housing located close to accessible transportation that is also affordable. Families with children may need affordable units with a greater number of bedrooms in proximity of a school. Finding affordable housing that also meets these additional needs can be difficult.

Some strategies to overcome barriers imposed by housing costs while improving access to opportunity include encouraging a variety of housing types in high demand areas and considering additional ways to reduce the cost of housing. For student households, group living options may be another approach to better match housing to incomes.

Finally, it is essential to focus on educating both landlords, management companies, and tenants about fair housing. While this is discussed in detail in other sections, it should be noted as an important component of the City's and other nonprofits' efforts to affirmatively further fair housing in the community.

Housing Design and Accessibility

While not the top barrier cited in the 2018 Fair Housing Choice Survey, more than half of respondents saw lack of housing options for people with disabilities as a barrier to fair housing in Iowa City. HUD endorses the “visitability” concept, which is a voluntary standard in new construction and existing properties. Visitability means that at least one entrance is at grade, approached by an accessible route, such as a sidewalk and that the entrance door and all interior doors on the first floor are at least 34 inches wide, offering 32 inches of clear passage space, and a bathroom on the main floor that you can use in a wheelchair. Visitability allows mobility impaired residents to visit families and friends where this would not otherwise be possible.

A visitable home also serves persons without disabilities (for example, a mother pushing a stroller, a person delivering large appliances, etc.). One difference between “visitability” and “accessibility” is that accessibility requires that all features of a dwelling unit be made accessible for mobility impaired persons. A visitable home provides less accessibility than an accessible home and is meant to be those units not required to be accessible.

The City’s building code promotes both accessibility and visitability beyond HUD’s minimum requirements as codified in law and regulation. As such, the concept of visitability is incorporated in all new assisted homeownership or rental projects. It is also required for certain rehabilitation projects, which is supported by federal requirements regarding accessibility for federally assisted housing.

In addition, the Greater Iowa City Home Builders Association is active in promoting housing accessibility. They have partnered in the Livable Communities of Johnson County initiative which encourages and informs residents about Aging in Place. They have also actively promoted certifying Aging in Place Specialists to ensure local builders have the technical, business management, and customer service skills to provide home modifications for the aging in place, and in the process, making homes more “visitabile”. Iowa City currently has 18 certified specialists due to these efforts. As a result, many new homes are also voluntarily built with visitability and accessibility in mind.

In cases where homes are not accessible, the City makes funds available to make accessibility improvements. For owner-occupied properties, half of these funds may be forgiven in targeted areas. Several area nonprofits have similar ADA accessibility improvement programs as well, including the Iowa Valley Habitat for Humanity.

Chapter 5: Impediments & Recommendations

This Chapter analyzes factors that create, contribute to, perpetuate, and increase the severity of fair housing issues. Identifying contributing factors is important in assessing why members of protected classes may experience restricted housing choice due to various reasons including, but not limited to, segregation, disparities in access to opportunity, disproportionate housing needs, or other issues. Some contributing factors are outside of the ability of the City to control or influence; however, such factors should still be identified and recognized.

After discussing and identifying barriers to fair housing choice in Iowa City, it is important to lay out strategies to overcome those barriers. These strategies can then be prioritized and incorporated into subsequent planning processes such as the Consolidated Plan. Ultimately, the City is responsible for taking meaningful actions to move towards completing the strategies identified. Meaningful actions are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity.

The City of Iowa City is committed to providing fair housing choices for all its residents. The City Code has a broad definition of discriminatory behavior, an inclusive definition of protected classes, and is clear in its lack of tolerance for discriminatory behavior in the housing market. The City's Comprehensive Plan envisions a city with a variety of housing options for the city's diverse population. The City's Zoning Ordinance allows for construction of a variety of housing types at different price points. And the City's Building Code does not impose conditions that could restrict fair housing choice for protected classes. However, policies and practices can be improved upon and the City can take additional steps to assure that all protected classes have fair access to housing in Iowa City. These identified impediments to fair housing choice and some strategies to address them comprise the rest of this Chapter.

1: Improving Housing Choice

One of the primary barriers identified is the lack of adequate housing choices throughout neighborhoods in Iowa City for residents with protected characteristics, who tend to have disproportionately lower incomes. This includes a lack of availability in addition to diversity in price points, housing types, and locations that would facilitate equal access to housing across the City. While many low-income households in Iowa City are nonfamily student renters, 21% are small families (including single parents) and 15% are elderly. 31% of low-income households have a member with a disability. Many are people of color. Large families face additional challenges in finding appropriate units with the proper price points. Coupled with the City's expensive housing, this has negatively impacted fair housing choice within Iowa City.

Ensuring a diversity of affordable housing is available in a range of locations and types to promote fair housing choice, especially in areas that promote access to opportunity. This means encouraging the provision of affordable housing for households of all types in Iowa City, including larger units for families with children, smaller accessible units with supportive services for the elderly and persons with disabilities, and adequate housing for students. When considering housing choice, transportation, supportive services, school quality, and other important factors must also be considered. The City should continue to support and encourage a diversity of housing types in areas of opportunity. The following strategies assist in addressing this impediment to fair housing choice:

Strategy 1: Facilitate a Range of Housing Types

One strategy to overcome this barrier is to allow a wider variety of development types in areas throughout the community. Since most areas are zoned for low density, single family homes, this will require exploring ways to increase the density and the types of housing allowable in order to further fair housing goals. This strategy includes promotion of more types of housing in more varied locations, which also facilitates the creation of housing units at different price points within neighborhoods.

Many non-single family residential developments require rezonings to increase density. The City can proactively increase the amount of land available for development by-right for higher densities, as encouraged by the Comprehensive Plan along major arterials, intersections, and commercial centers. This may be especially helpful where undeveloped land is zoned for single family and would allow a variety of housing types as the land is developed. Staff could proactively look for areas intended for higher densities and initiate a rezoning with the City as the applicant.

Eliminating the distinction between single family and multi-family residential zoning districts would have a similar effect, thereby regulating by density rather than type of housing. Similarly, the City could make flexible zoning arrangements, such as OPD overlays, provisional rather than negotiated. This would encourage its use while simultaneously promoting a range of housing.

Another way to increase housing variety is to remove restrictions on housing sizes for units that are not detached single family units (i.e. attached single family, duplex, and multi-family dwellings). Specifically, the code places a bedroom cap on these types of units, which may negatively affect the ability of certain protected classes to find appropriate units, such as large families. The City should explore expanding the number of bedrooms from three to four in multi-family units and consider when this would be allowed to better accommodate larger families throughout the City. While this does not necessarily change the type of housing, it does allow a greater diversity of units within a specific type of housing.

Strategy 2: Lower the Cost of Housing

In addition to facilitating a wider range of housing types throughout Iowa City, reducing the cost of housing can also help ensure more varied price points, especially in the more affordable rental and owner markets. The City is already in the process of working with the Home Builders Association to explore ways of reducing costs through modifications to the zoning and development codes.

One way to lower the cost of housing is to evaluate building and housing permit fees and their effects on housing costs. Given that these fees have a higher relative impact on lower cost units, it is recommended that the City explore reducing or waiving fees for properties which are operated for affordable housing by non-profit housing organizations to offset negative disproportionate impacts. This could be used for properties in the private market receiving City assistance for a period of time for affordable housing as well.

It may also be possible to use property tax policies to lower the cost of housing. While there are already several such programs for the most vulnerable populations, including seniors, persons with disabilities, and affordable rental housing providers, broadening property tax relief could further help preserve lower-income homeownership opportunities for the more than 4,000 low income homeowners in the City. For example, tax exemption policies could be used to increase the affordability of housing.

The ongoing viability of the existing housing stock becomes increasingly important as the cost of new housing continues to rise. Continued improvement and maintenance of the current stock is vital. Efforts towards energy conservation can also reduce heating and cooling costs when rehabilitating older homes. All these factors can help lower the cost of housing.

Due to the number of student households in the community, the City should explore ways to increase affordability and housing choice for this demographic. Incentives for housing programs should remain available for students from low income families and students who are financially independent.

Strategy 3: Continue investment in affordable housing

There is a growing gap in the number of affordable homes for those with lower incomes. Continuing affordable housing activities is crucial to creating a variety of housing types and price points within the community. This can include new construction, acquisition, and rehabilitation of rental and owner properties. These provide a valuable opportunity to improve housing choice for members of the protected classes who are often low- and moderate-income households. This also includes leveraging City funds to obtain additional affordable housing investment in the community through LIHTC or other programs that assist with the construction of affordable housing opportunities. Assisting renters' transition to homeownership, in certain cases, may also help stabilize housing payments through fixed rate mortgages in a market experiencing increasing rental rates.

Strategy 4: Retrofit Housing for Equal Access

In some cases, appropriate units are not be available, especially for those with disabilities. In such cases, it becomes important to allow owners and renters to make housing units accessible so that they have an equal opportunity to use and enjoy a dwelling. Access may include physical access for individuals with different types of disabilities. For example, installing ramps and other accessibility features for individuals with mobility impairments, visual alarms and signals for individuals who are deaf or hard of hearing, and audio signals, accessible signage, and other accessibility features for individuals who are blind or have low vision. To facilitate this need, the City should adopt a Reasonable Accommodation or Modification procedure to their zoning ordinances and other policies. This would allow persons with disabilities to request a reasonable accommodation/modification to

regulatory provisions, including land use and zoning requirements to facilitate the retrofitting of existing housing.

In addition, because many low-income households are elderly and/or disabled, continuing to provide assistance to allow those households to age in place is also important, as is continuing to invest in their housing to ensure it remains safe, decent and affordable.

2: Facilitating Access to Opportunity

Housing that affords access to opportunities, such as high-performing schools, public transportation, employment centers, low poverty, and environmentally healthy neighborhoods may be cost prohibitive or non-existent for persons in certain protected classes, especially for those with lower incomes. High costs can have a greater effect on families with children who need multiple bedrooms and individuals with disabilities who need accessible housing or housing located close to accessible transportation. Currently, Iowa City appears to have some disparate access to opportunity, especially when it comes to access to jobs and other quality of life factors such as affordable childcare.

The geographic relationship of employment centers, housing, and schools, and the transportation linkages between them, are important components of fair housing choice. The quality of schools and economic opportunities are often major factors in deciding where to live. Job and school quality are also key components of economic mobility. Ensuring affordable units are available in a range of sizes, locations, and types is essential to providing equal access to opportunities by meeting the needs of individuals with protected characteristics. In Iowa City, ensuring the availability and accessibility of a variety of jobs and training opportunities, is also vital. In addition, affordable childcare should be available and close to a range of housing opportunities, and facilities should be fully accessible to individuals with different types of disabilities to avoid further barriers.

As such, siting as it relates to the placement of new housing developments, especially those that are affordable, becomes crucial. This includes new construction or acquisition with rehabilitation of previously unsubsidized housing. Local policies and decisions significantly affect the location of new housing. In addition, the availability, type, frequency, and reliability of public transportation including buses and paratransit for persons with disabilities also affect which households are connected to community assets and economic opportunities. As such, it is important to connect individuals to places they need to go such as jobs, schools, retail establishments, and healthcare.

This study proposes a balanced approach to address disparities in access to provide for both strategic investment in areas that lack key opportunity indicators, while opening housing opportunities in areas with existing opportunity through effective mobility options and the preservation and development of a variety of housing in high opportunity areas. Several strategies can assist in addressing this impediment to fair housing choice:

Strategy 1: Emphasize Variety in Housing in Areas of Opportunity

Areas of opportunity are places where jobs are relatively plentiful and access to education, healthcare, and other amenities is close at hand. Iowa City generally ranks highly when it comes to quality of life. However, some areas of town have less access to opportunity as identified within this Study, especially as it relates to affordable childcare and job access. Analysis suggests there are some discrepancies in services and access to opportunity by race, income, and area. To some extent, this is likely due to clustering of racial and ethnic groups. All protected classes should have an equal opportunity to live throughout Iowa City. Increasing housing variety for a range of household types and price points, in areas with affordable childcare and near job centers is one way to achieve fair housing choice while improving access to opportunities. This strategy complements those related to increasing the variety of available types and prices of housing.

The placement of the City's subsidized housing is governed by the Affordable Housing Location Model (AHLM). The model serves to not place additional subsidized housing in areas that already have a concentration of City-assisted housing and lower incomes as determined by elementary school catchment areas. The model does not apply to housing for persons with disabilities, seniors, the rehabilitation of existing rental housing or for homeownership. The AHLM does not necessarily promote greater variety of price points in areas of opportunity. As such, the City could explore ways to use the

model or another policy to promote city-assisted housing in low poverty neighborhoods or neighborhoods that provide good access to opportunity.

The goal of fair housing choice is to provide sufficient, comparable opportunities for housing for all types of households in a variety of income ranges. Comparable units should have the same household (elderly, disabled, family, large family) and tenure (owner/renter) type; have similar rents/prices; serve the same income group; in the same housing market; and in standard condition. The goal is not to necessarily have an equal number of assisted units within each neighborhood, but rather that a reasonable distribution of assisted units should be produced each year to approach an appropriate balance of housing choices within and outside neighborhoods over several years. An appropriate balance should be based on local conditions affecting the range of housing choices available for different types of households as they relate to the mix of the City's population.

Strategy 2: Community Investment

It is recommended that the City pursue additional investment in neighborhoods with higher concentrations of low income families, especially those with concentrations of persons with protected characteristics, to improve the quality of life for existing residents. This may include a range of activities such as improving housing, attracting private investment, creating jobs, expanding educational opportunities, and providing links to other community assets. The quality and maintenance of housing is especially important to community investment as survey respondents rank it as one of the factors that varies most widely between areas of the City.

As a result, the City should continue targeted investment in infrastructure, amenities, community facilities, and public services serving lower income households and in low income areas. Amenities such as recreational facilities, grocery stores, pharmacies, and banks are especially important in maintaining a higher quality of life. Housing rehabilitation is also important in maintaining the housing stock and appearance, while new construction in areas that have not received as much recent investment can also be beneficial. Special attention should be given to investments that increase access to housing or that lower housing costs generally, such as energy efficiency improvements. Economic development support near low-income neighborhoods also can create jobs, increase wages, and increase access to amenities. This strategy in conjunction with providing a diversity of housing types in all new neighborhoods creates opportunities of access throughout the City.

Preserving the City's existing affordable housing is also important as part of a balanced approach to affirmatively further fair housing. This can include funding and indirect subsidies for rehabilitation to maintain physical structures, refinancing, affordable use agreements, and incentives for owners to maintain affordability. Similarly, efforts to repair and maintain the infrastructure of existing affordable housing should be part of concerted housing preservation and community investment effort.

The City should continue encouraging private investment to advance fair housing from homeowners, developers, and other nonprofit or business initiatives. Securing financial resources (public, for-profit, and nonprofit) from sources inside and outside the City to fund housing improvements, community facilities and services, and business opportunities in neighborhoods will help ensure access to opportunities for all residents.

Strategy 3: Enhance Mobility Linkages Throughout the Community

Non-automotive transportation is an important part of ensuring equal access from housing to jobs and other amenities in Iowa City. Transportation improvements could significantly improve access to opportunity for employment and other services and amenities for those who rely on public or active transportation. This complements policies to increase the range of housing opportunities near opportunity and employment areas which can reduce spending on transportation-related expenses.

Strategies to enhance both active and public transportation linkages may include improved coordination with service providers, expansion of active and public transportation to provide access to jobs through improved infrastructure, providing late night/ weekend service, or ensuring adequate coverage to assist with access to opportunities. Investment across the City can also include improved transit facilities and equipment, including bus shelters, and expanded bicycle and pedestrian facilities. Prioritizing ADA access is especially important to further fair housing purposes.

3: Increasing Education and Outreach

Based on public input, many residents of Iowa City lack awareness about rights under fair housing and civil rights laws, which can lead to under-reporting of discrimination, failure to take advantage of remedies under the law, and the continuation of discriminatory practices. Even those who do know their rights do not always act on them due to feeling it would not be productive or fear of reprisal. This suggests a lack of knowledge and awareness regarding fair housing rights is a major barrier to fair housing choice.

Ensuring access to information about housing programs and neighborhoods can also facilitate fair housing goals. This is because individuals and families attempting to move to a neighborhood of their choice, especially areas of opportunity, may not be aware of potential assistance or support. In those cases, having quality information related to housing and affordability, available services, and organizations that serve potential tenants, can help those moves be successful. Other relevant info may include listings of affordable housing opportunities or local landlords; mobility counseling programs; and community outreach to potential beneficiaries.

Several strategies can assist in addressing this impediment to fair housing choice.

Strategy 1: Improve Demand-Side Awareness

The demand-side of the housing market includes tenants, homeowners, borrowers, mobile home park residents, and other who need and/or use housing. Generally, these groups do not have any formal training or education regarding their fair housing rights, nor are they formally organized in most cases. This makes it important to raise awareness through advocacy campaigns, education and outreach activities geared toward the general public, and fair housing informational materials for both homebuyers and tenants. Housing Choice Voucher (HCV) holders should especially be informed of their rights, including the right to be free from discrimination based on source of income. In addition to fair housing rights, this should include how to report violations of those rights.

It is recommended that the City explore the development of new outreach, education, or informational programs and activities to promote housing opportunities for segments of the community such as persons of color, those not as fluent in English, and for the elderly and persons with disabilities. This should be done in cooperation with other organizations working on furthering fair housing. Ideally, this will increase knowledge of the laws, reduce discriminatory behavior, achieve a better understanding, and reduce negative attitudes concerning people who are racially, ethnically, and culturally diverse or who are disabled. A comprehensive program would help ensure that there is broad knowledge of legal protections for all residents.

Beyond fair housing information, providing more generalized information about housing can be beneficial. For example, information for tenants about leasing can improve rental outcomes and homebuyer education can help those less familiar with homeownership, such as long-term renters, overcome challenges as first time homebuyer. Those new to the HCV program can also benefit from additional information about facilities and services available in each neighborhood to assist them with their housing search. This may encourage voucher holders to look for housing in neighborhoods with more access to opportunity. This information can also assist residents moving from high-poverty to low-poverty neighborhoods that have greater access to opportunity assets appropriate for their family.

It is important that information is comprehensive (e.g. that the information provided includes a variety of neighborhoods, including those with access to opportunity indicators) and up-to-date (e.g. that the information is actively being maintained, updated and improved). The information should also alleviate fears of retaliation and should showcase the process and concrete outcomes to address those who “didn’t know what good it would do” to report discrimination.

Strategy 2: Increase Supply-Side Awareness

The supply-side of housing includes lenders, appraisers, mortgage insurers, realtors, landlords, and management companies. Unlike the demand-side, these groups are often provided formal training regarding fair housing rights through industry groups or employee training. As such, they require less guidance than the demand-side of housing. However, it is still important that they understand fair housing rights and responsibilities as well, especially small landlords or others who may be less formally integrated within the industry. As such, technical training for housing industry representatives remains an important component of the City's efforts to affirmatively further fair housing in the community.

In addition to general fair housing rights, those on the supply-side of housing should also be made aware of best practices and efforts to affirmatively further fair housing through equity, inclusion, fairness, and justice. This could involve providing education regarding marketing in targeted neighborhoods or for protected classes and encouraging advocacy groups to share opportunities for their products and services. Similarly, additional technical training regarding civil rights may include fair housing issues such as the appropriate application of arrest and criminal conviction records, credit policies, prior evictions, leasing and lease termination decision making; and fair housing issues affecting LGBTQ individuals. Pro-active outreach can widen the pool of participating rental housing providers, including both owners of individual residences and larger rental management companies.

Meanwhile, the City should encourage these groups to regularly examine and update their policies, procedures, and practices to avoid differential treatment of residents and applicants based on protected characteristics. Similarly, supply-side providers should also be encouraged to examine their clientele profiles to determine whether there are neighborhoods or groups that are underrepresented or unrepresented. Doing so will help supply-side providers to go beyond just understanding fair housing issues towards meaningfully furthering fair housing.

Strategy 3: Increase Regulator Awareness

The City must ensure those who make decisions regarding public policies and regulations, including public officials, Commission and Board members, and staff, have adequate fair housing training. While this will further fair housing, it may also help inspire confidence in the City's processes. In addition to general training, one potential method of educating decision-makers would be to train them as fair housing ambassadors who can then help spread the word about fair housing to both demand- and supply-side groups.

Strategy 4: Provide meaningful language access

Individuals with limited English proficiency (LEP) includes anyone who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English. Often, this is tied to foreign-born populations who may not understand English. Increasing meaningful language access regarding fair housing information and housing programs would facilitate housing choice for LEP individuals seeking housing. It is important that housing providers and policy makers ensure that all individuals have access to information regarding fair and affordable housing, regardless of language. In Iowa City, this is particularly salient due to the higher prevalence of foreign-born populations.

Relevant City departments maintain Limited English Proficiency (LEP) plans to ensure equal access to knowledge of fair housing and housing assistance. However, the LEP plan likely needs to be updated, especially as the number of foreign-born residents has rapidly grown in recent years. In addition, the City should explore what housing documents are most important to translate to achieve a better understanding of fair housing choice by LEP speakers and to improve communication through language access.

4: Operational Improvements

Several other barriers to fair housing choice in Iowa City included smaller operational and planning changes that could help affirmatively further fair housing. These include impediments such as administrative processes and regulations which can slow down and/or stop projects that would benefit protected classes, a need for increased regional cooperation for issues that affect housing, a lack of information that could help identify or address other barriers, and a need to improve the transparency of fair housing enforcement. Most of these barriers can be addressed through operational improvements at the City level, though accomplishing in cooperation with others may improve their effectiveness.

Strategy 1: Improve Fair Housing Enforcement and Transparency

In addition to ensuring awareness of fair housing rights and process, the City needs to improve enforcement and increase transparency in the process, so the public can be aware that complainants obtain relief in a timely and effective manner. Doing so would fight feelings of helplessness and provide certainty to complainants that filing a report helps combat fair housing violations. This may include actively monitoring the outcomes of complaints, in addition to making fair housing complaint information more easily visible to the public.

Fair housing testing may also assist with transparency and fair housing enforcement. Doing so allows the City to identify whether landlords or realtors, and others involved in the housing market are abiding by fair housing laws. In addition, these tests help the City to better identify and target fair housing outreach.

Strategy 2: Review implementing procedures and regulations

The City has several new programs, administered by various staff and departments, with various rules that can be confusing to understand, implement and enforce. This problem is exacerbated when the program is combined with federal programs that have rigid, complex rules. This creates a challenging regulatory environment, especially for affordable housing and public service programs. As such, there are opportunities to harmonize, coordinate, streamline, and define administration and planning. Possibilities include centralizing processes for affordable housing and ensuring they are online; reducing uncertainty for service providers in allocating funds; and harmonizing rules between programs.

Similarly, the zoning ordinance has been updated in fragmented ways since its initial adoption. While it generally accommodates the City's fair housing goals, codes frequently updated can indicate a need for a comprehensive reevaluation. This is a long-term effort. In the meantime, incremental improvements can make the code easier to follow yet still comprehensive and flexible. One simple change is to reclassify community service - long term shelter as a multi-family/mixed use, since it is a long-term residence rather than a public service shelter use. Another similar change is to clarify the definition of nonfamily households; the current City definition is a holdover from before the State modified law to prohibit regulating use based on familial characteristics.

In addition, administrative procedures may better promote fair housing choice as compared to some decision-making processes. Updating administrative policies and practices may help support Council objectives in ways that produce more impartial, predictable outcomes. The City should promote funds to organizations committed to affordable housing and who have the capacity to administer long term housing projects. Agencies receiving funds should have the capacity to administer the project for the entire compliance period while enhancing fair housing. By doing so, the City increases the likelihood of maintaining the units as affordable housing after City and federal restrictions are released.

Regardless, all changes to administrative, zoning, or other public policies and practices should be preemptively evaluated through the lens of fair housing. This is also true as new policy continues to develop, including potential changes to the housing and zoning following the State's disallowing the use of a rental permit cap.

Strategy 3: Improve regional cooperation

Regional cooperation includes networks or coalitions of organizations, people, and entities working together to plan for regional development. Cooperation in regional planning can help coordinate responses to identified fair housing issues that cross multiple sectors—including housing, education, transportation, and commercial and economic development—and multiple political and geographic boundaries. As such, encouraging regional cooperation can further fair housing not only for Iowa City, but the entire region. This was also mentioned as a need in many stakeholder meetings.

While the City and surrounding jurisdictions cooperate through regional transportation planning and through the Fringe Area Agreement, there are still additional opportunities to better coordinate housing and fair housing planning on a regional level. Projecting development and demand for different types of housing and price points is one way to approach the issue. Doing so can start a discussion about how to facilitate housing choice in each of the communities. Communication between staff can also facilitate coordination between jurisdictions.

Strategy 4: Improved Data Collection

Another impediment is the need for increased data, analysis and reporting. While improving data collection and analysis does not directly overcome a barrier to fair housing choice, it will help identify potential barriers in the future. All of these can also be paired with equity mapping to identify areas of opportunity using factors relevant to fair housing choice.

Currently, many of the City's local housing programs do not require the same level of tracking and reporting regarding protected characteristics of beneficiaries as federal programs. As part of its annual monitoring of these projects, the City should begin tracking and reporting the race, ethnicity, and other protected characteristics of beneficiaries to allow finer levels of analysis and reporting regarding fair housing choice. This will also allow better measurement regarding the extent to which policy and practice changes are impacting outcomes and reducing disparities.

In addition, the City should regularly monitor HMDA reports of financial institutions and obtain information on the location of properties that are the subject of loan applications. HMDA data can be used to develop policies to act upon this information such as incentivizing banks with good performance records by only depositing public funds in banks that meet threshold scores. Similarly, location information can help the City guide lender education activities to promote fair housing.

Finally, ICHA should regularly analyze its beneficiary and waitlist data to ensure its preferences do not have a disparate impact on those in protected classes and that it is serving the people most in need as determined by the City's Consolidated Plan. As part of this, ICHA should periodically update an equity analysis to identify if any disparate impacts are identified.

Signature Page

A. Chief Elected Official

Appendix A

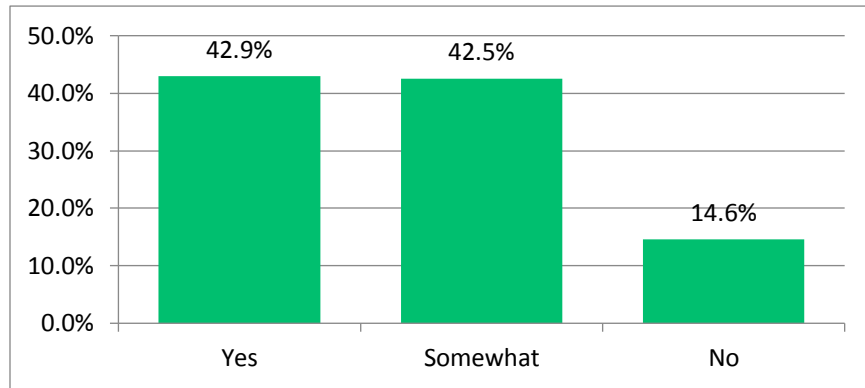
Fair Housing Survey Results

FAIR HOUSING STUDY SURVEY RESULTS

Question 1: Do you understand your fair housing rights?

Answered: 233

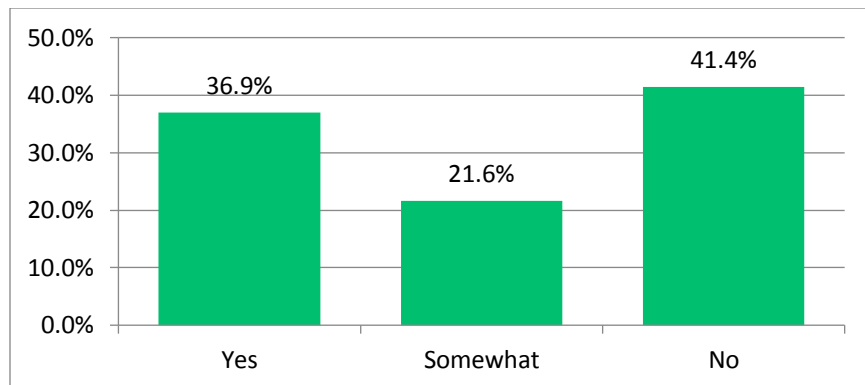
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Question 2: Do you know where to file a housing discrimination complaint?

Answered: 222

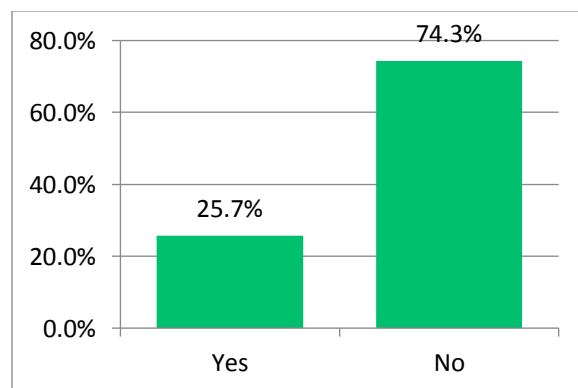
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Question 3: Since living in the area, do you believe you experienced housing discrimination?

Answered: 222

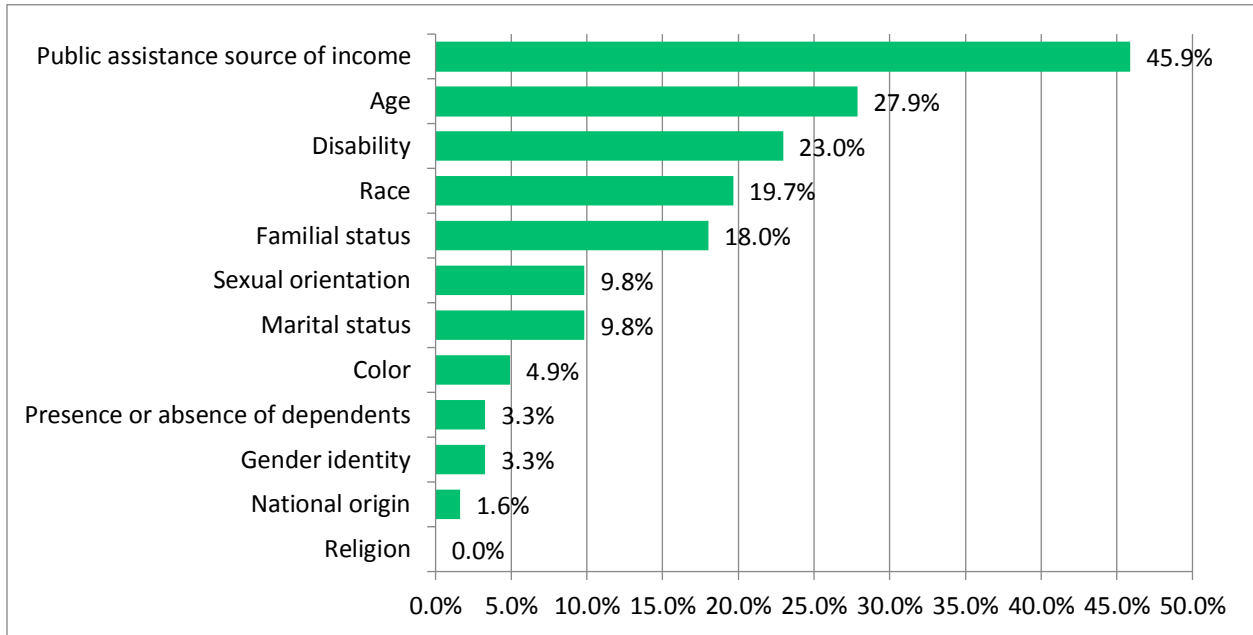
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Question 4: If YES, on what basis do you believe you were discriminated against? Check all that apply.

Answered: 61

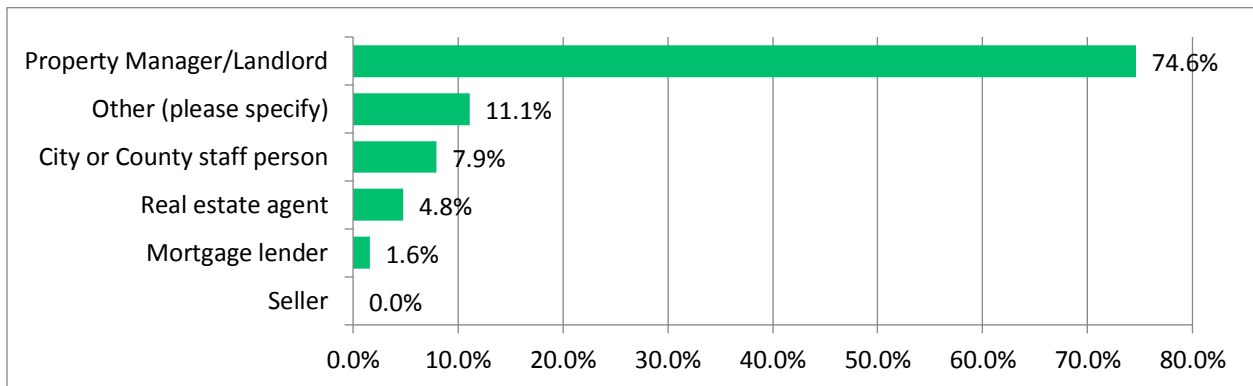
Skipped: 173



Question 5: Who discriminated against you?

Answered: 68

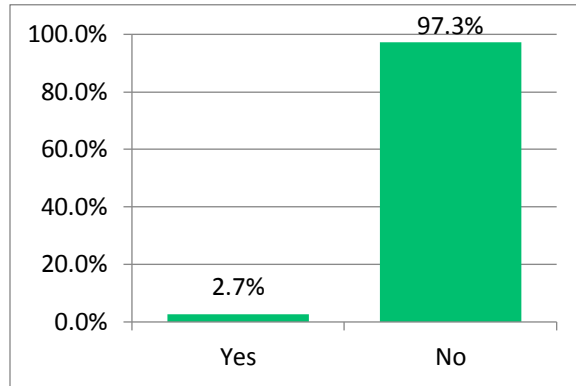
Skipped: 166



Question 6: Did you file a report of discrimination?

Answered: 73

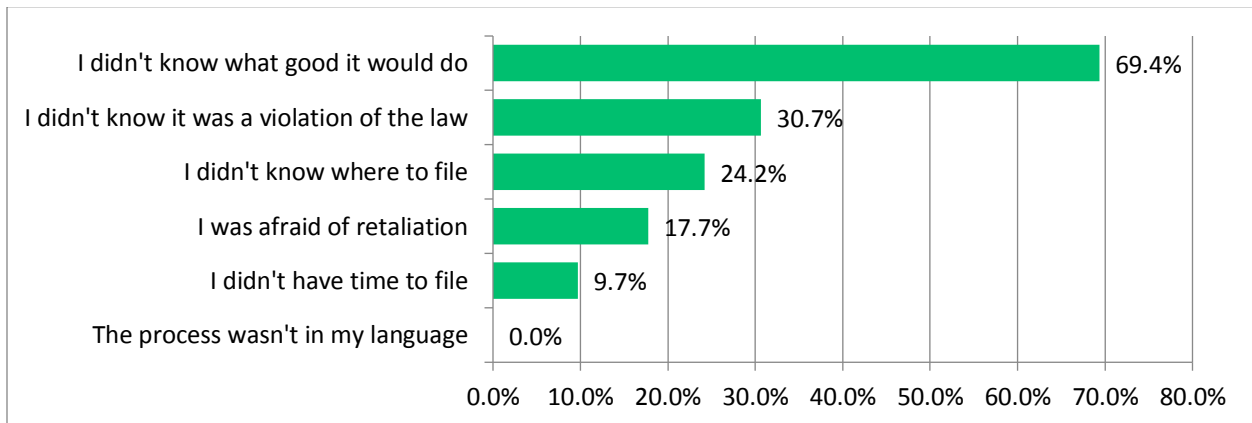
Skipped: 161



Question 7: If you answered NO, why didn't you file?

Answered: 62

Skipped: 172



Question 8: If you believe you were discriminated against, please describe what happened.

Answered: 57 (answers like "NA" removed)

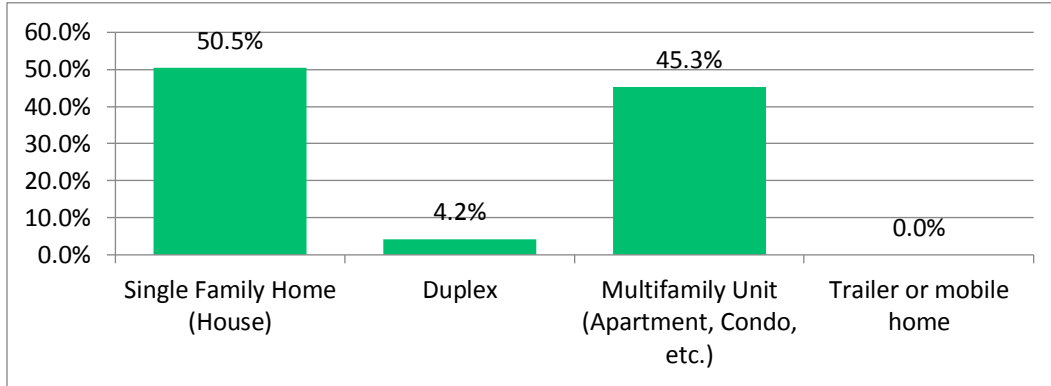
Skipped: 177

See Appendix for full qualitative answers

Question 9: What type of home were you searching for?

Answered: 95

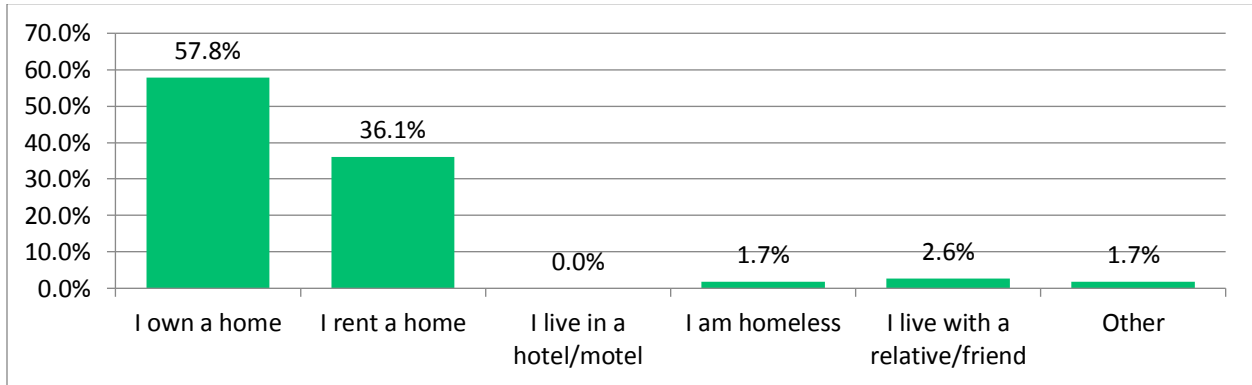
Skipped: 139



Question 10: What is your current housing status?

Answered: 230

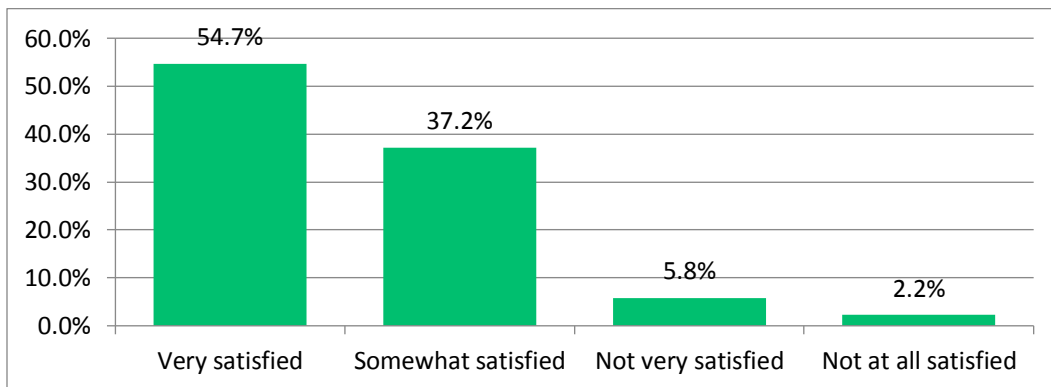
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Question 11: How satisfied are you with the neighborhood where you live?

Answered: 223

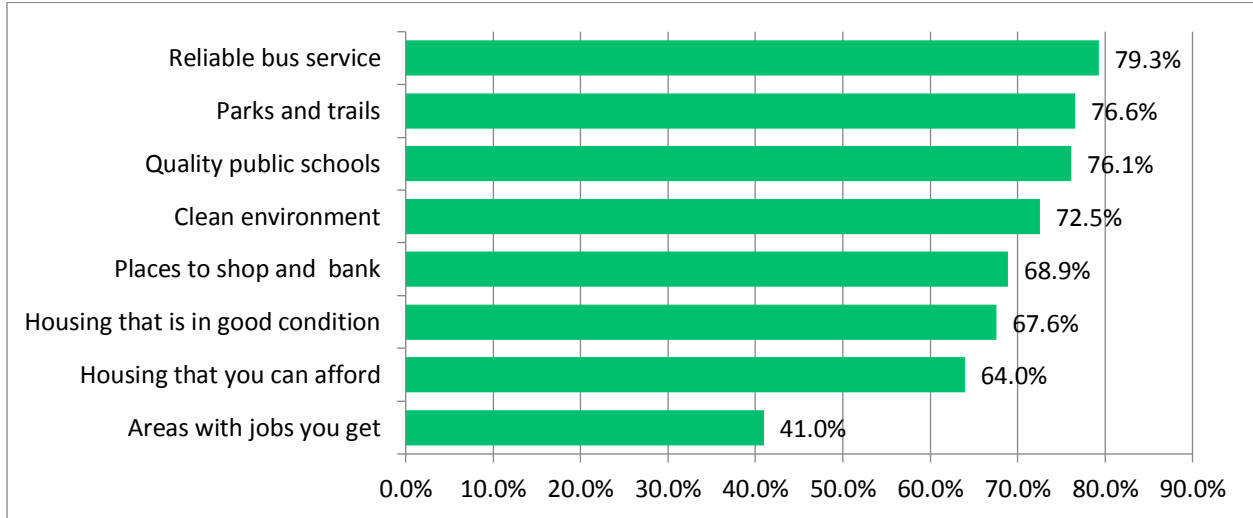
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Question 15: In your neighborhood, do you have access to the following community resources? Check all that apply.

Answered: 222

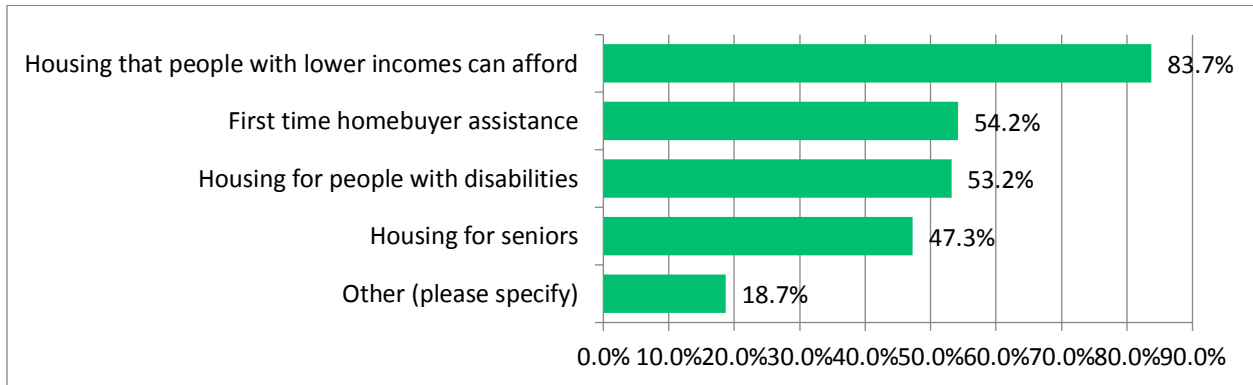
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Question 16: Please check whether you think more is needed for each housing type below.

Answered: 203

Skipped: 31

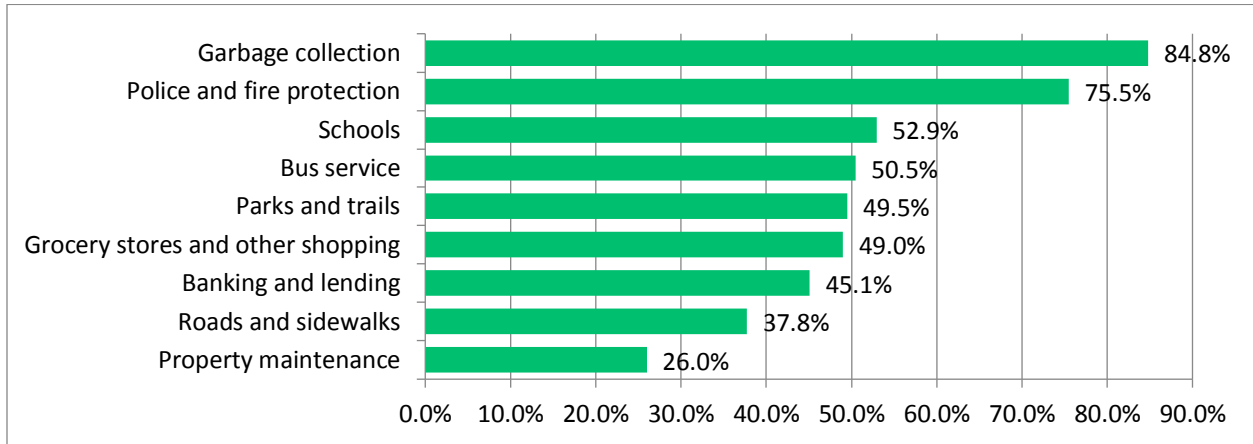


See Appendix for full qualitative answers

Question 17: Please check whether you think each of the following are equally available and kept up in all areas.

Answered: 204

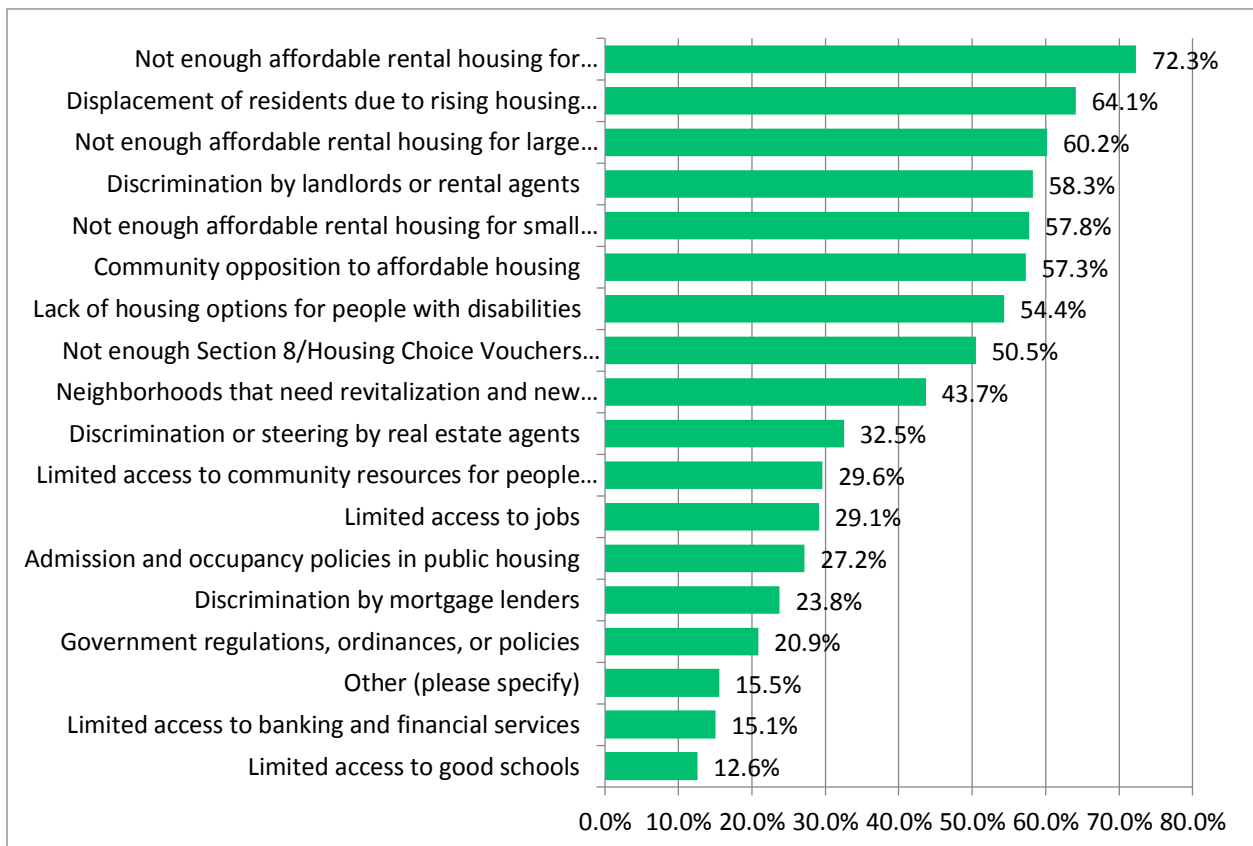
Skipped: 30



Question 18: Do you think the following are barriers to fair housing choice in Iowa City? Check all that apply.

Answered: 206

Skipped: 28



Question 21: What can the City do to create and ensure fair housing choice in Iowa City?

Answered: 152

Skipped: 82

See Appendix for full qualitative answers

A word cloud of responses for Question 21. The words are arranged in a roughly rectangular shape, with 'housing' and 'affordable' being the largest and most prominent. Other significant words include 'rent', 'build', 'neighborhoods', 'landlords', 'low income', 'make', 'increase', 'cost', 'units', 'low', 'limits', 'need', 'families', 'income', 'Iowa City', 'good', 'balance', 'areas', 'tax', 'fair', 'housing', 'Require', 'rental', 'based', 'homes', 'sure', 'people', 'one', 'rental', 'based', 'homes', 'rent', 'options', 'build', 'section', 'housing', 'policies', 'affordable', 'sure', 'people', 'one', 'rental', 'based', 'homes', 'available', 'make', 'force', 'increase', 'property', 'cost', 'units', 'low', 'limits', 'need', 'higher income', 'families', 'maintain', 'income', 'Iowa City', 'good', 'balance', 'areas', 'tax', 'fair', 'housing', 'Require', 'Stop', 'tenants', 'enforce', 'assistance', 'afford', 'apartments', 'students', 'new builds', 'allow', 'downtown', 'live', 'project', 'residents', 'homeless', 'city', 'go', 'prices', 'developers', 'create', 'places', 'landlords', 'support', 'neighborhoods', 'low-income', 'housing', 'low income', 'find', 'affordable', 'housing', 'development', 'rent', 'options', 'build', 'section', 'housing', 'policies', 'affordable', 'sure', 'people', 'one', 'rental', 'based', 'homes', 'available', 'make', 'force', 'increase', 'property', 'cost', 'units', 'low', 'limits', 'need', 'higher income', 'families', 'maintain', 'income', 'Iowa City', 'good', 'balance', 'areas', 'tax', 'fair', 'housing', 'Require'.

Question 22: Please share any additional comments regarding fair housing choice in the space below:

Answered: 64

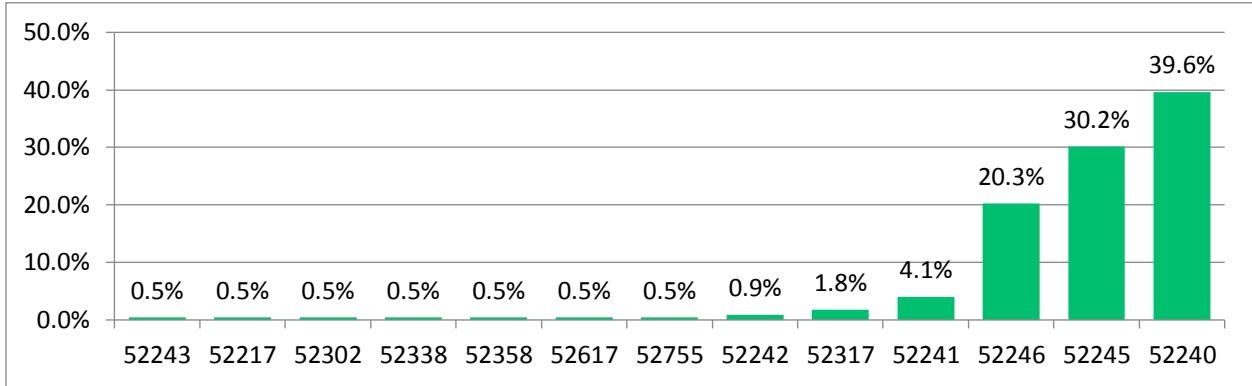
Skipped: 170

See Appendix for full qualitative answers

Question 23: Please select your zip code.

Answered: 222

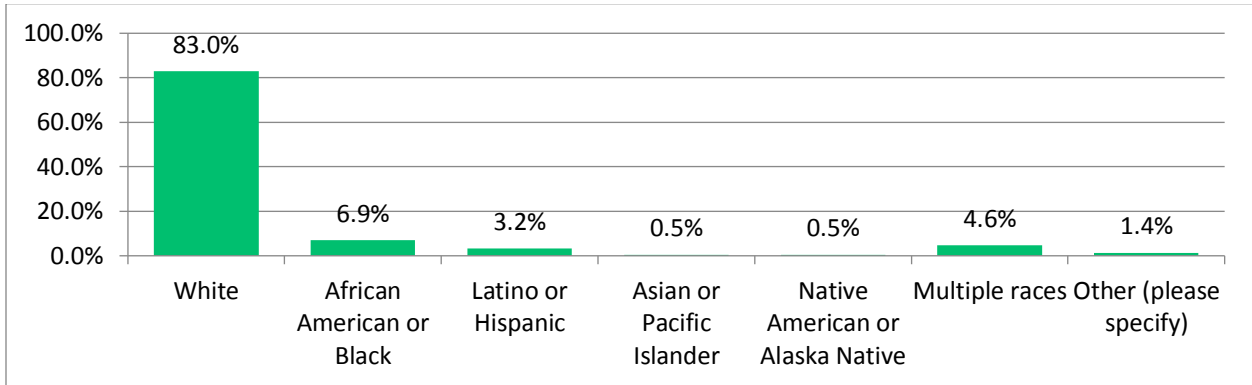
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Question 24: What is your race/ethnicity?

Answered: 217

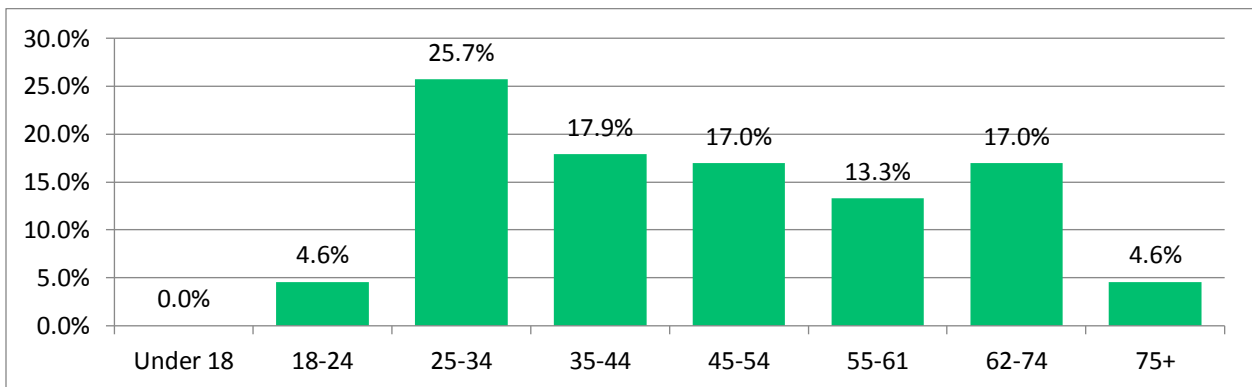
Skipped: 17



Question 25: What is your age?

Answered: 218

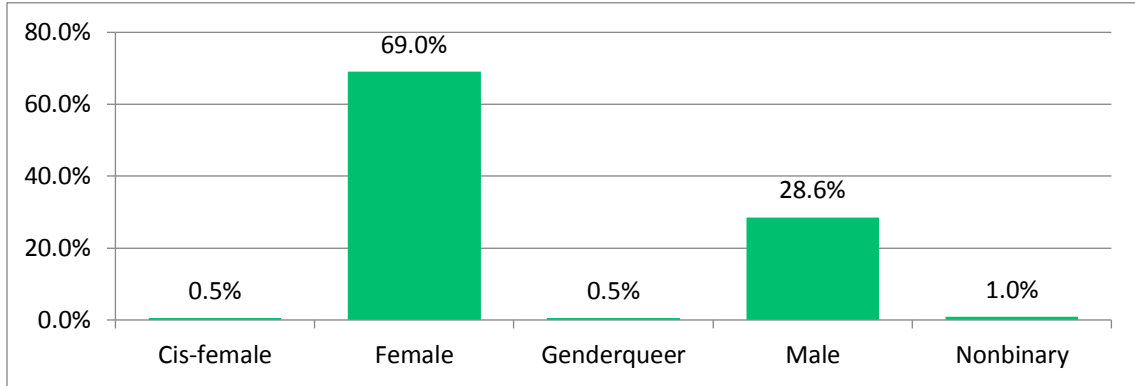
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Question 26: What is your Gender?

Answered: 210

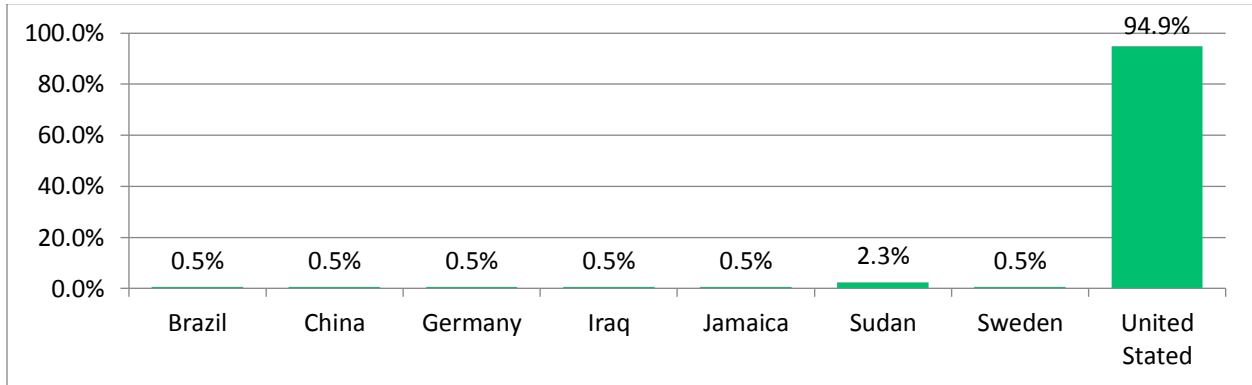
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Question 27: What is your country of origin?

Answered: 215

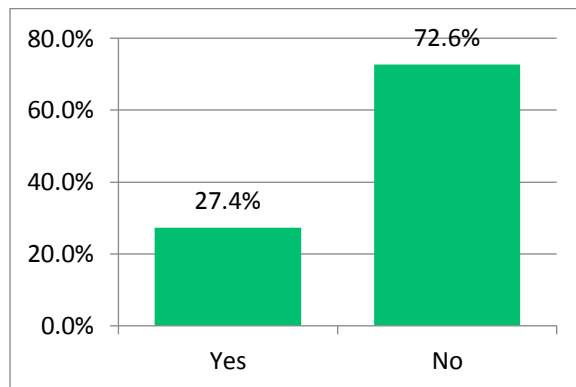
Skipped: 19



Question 28: Does anyone in your home have a disability?

Answered: 212

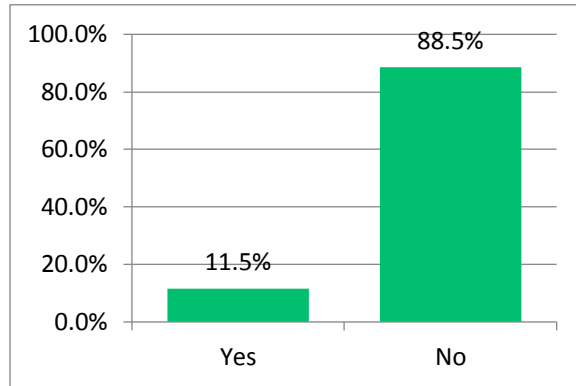
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Question 29: Does anyone in your home regularly speak a language other than English?

Answered: 217

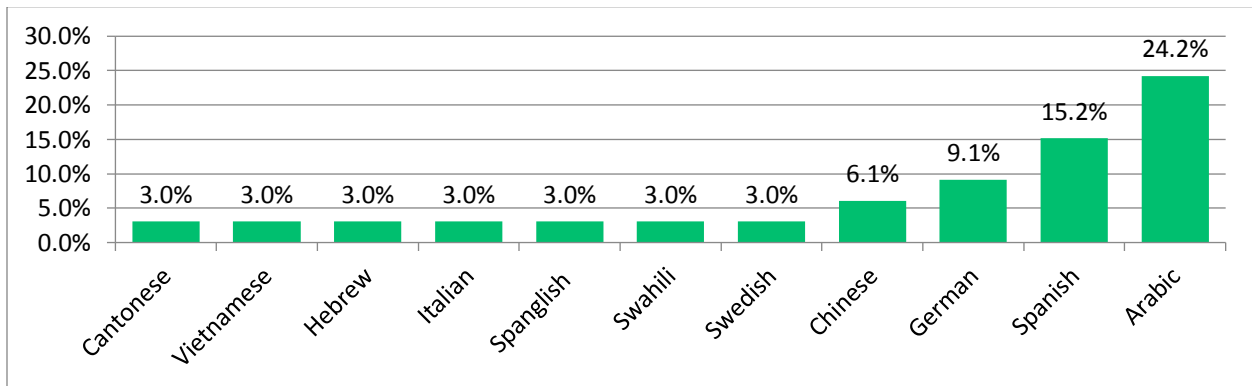
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Question 30: If you answered YES, what is the language?

Answered: 33

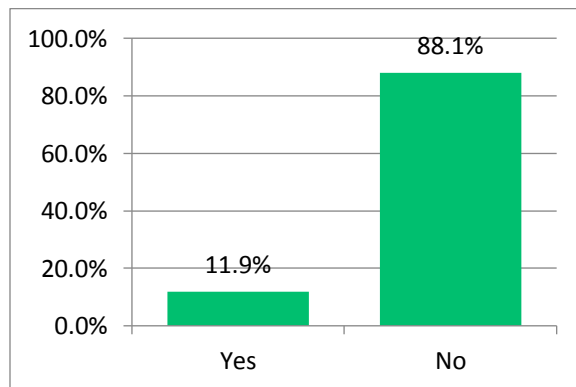
Skipped: 201



Question 31: Do you currently live in public housing or receive Section 8 rental assistance?

Answered: 218

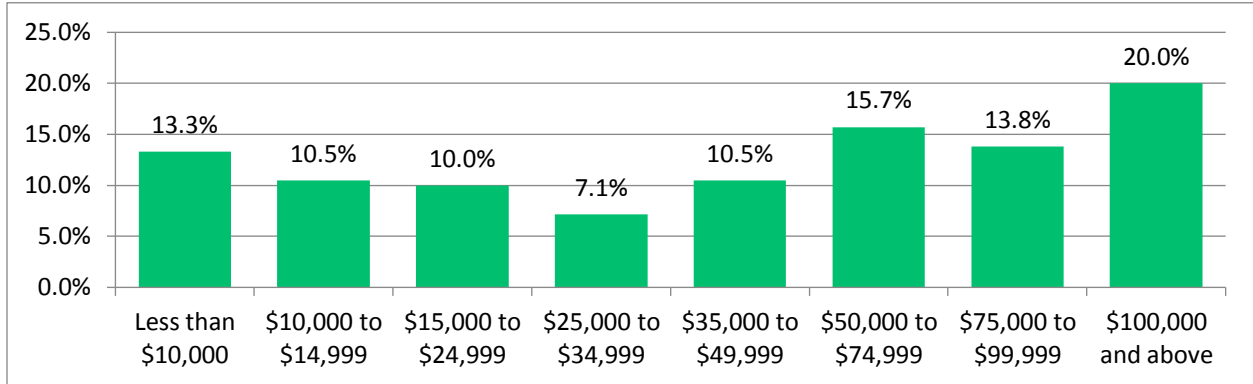
Skipped: 16



Question 32: What is your total household income?

Answered: 210

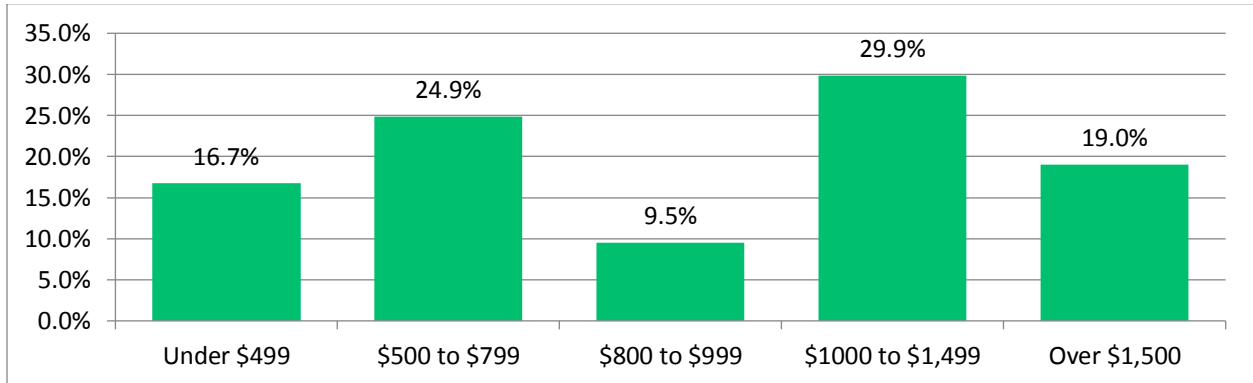
Skipped: 24



Question 33: How much did your household spend on housing last month?

Answered: 221

Skipped: 13



Question 34: Is there anything we did not ask that you believe is important for us to know as it relates to fair housing choice?

Answered: 67

Skipped: 167

APPENDIX: FULL QUALITATIVE ANSWERS

Question 8: If you believe you were discriminated against, please describe what happened.

Denied residency due to prejudice.
Smoking in the apartment
Refused to be allowed to move in with friends.
Appealed Section 8 based on my disabilities. Section 8 ignored this and I ended up in shelters with my daughter.
Landlords would not accept Section 8.
Gone from property for 60 days traveling, accused of messing with water meter d/t decreased use despite living I home for 32 years, using automatic payment system. Told they don't have customer phone numbers to notify. I believe it was ageist.
In legal terms, I wasn't discriminated against
I have a disability since birth
On-site manager was promised - that is not the case. Maintenance person is supposed to be here one day a week and if he shows up it's only for as long as he can get away with being here. Things that were promised in our lease have not been fulfilled. The manager does nothing to enforce the lease and we (the residents) need to take action and do the things he's supposed to be doing for us, as seniors.
I applied to housing in jobs they turn me down cause I don't have a job currently
I would call landlords asking if they took general assistance for deposit and it seems like once they hear your voice or know you need assistance they shut you down
Denied for shelter /living assistance
Others that are white are not recieving the same harassment and treatment that my black family is even though they are not paying rent on time and sometimes not paying at all all.
Landlords take advantage of young people all of the time who may not know their rights. My landlords have ALWAYS entered my apartments without giving me at least 24 hours notice. Most of their maintenance workers who would do this are men. As a female who lives alone, I have warned them that it's best they not send someone into my apartment without telling me - if a man came into my apartment unannounced, I'm obviously not going to be calm about it and can't promise what might happen! I have nothing to hide, but that's not the point - it's super disturbing and a huge violation of privacy.
I called around searching for an affordable apartment
Not rented to b/c of sec. 8
I was told I don't qualify for cheaper housing instead was offered more expensive housing in neighborhood with all one race
They said they don't accept Section 8
I was in an abusive relationship. Lived in a house where my disability was accommodated. When applying for Sec 8 I talked to landlord. The husband and wife said no they would rather have him stay because he was a man and could do stuff. Even though he didn't and my son in law did house repairs.
available apartments were not available when I showed up to look at them with two children; after the third time with different companies, my husband called to set up an appointment and went alone and the apartment was available. We also were trying to rent outside of the usual lease period of time and were told we couldn't do more than month to month until August. It was May.

waited long periods for maintenance, attempting to raise rent \$100 from one year to the next, higher rate for "repairs" upon moving out
I was not able to find housing because i received assistance from Section 8 and nobody wanted to rent to me.
Denied a viewing at a rental property because we had a baby.
Everything was going well until I broached Section 8. Was told they didn't accept it, while being looked upon as sub-human.
Insurance company would not insure home because it was a "group home"
The renter took a long time to respond to us knowing we were waiting outside the door. Once he came to the was not interested in answering our questions. Said the apartment was not available to us.
I became eligible for Section 8 in 2008. I had been on the waiting list for 2 years and really needed to have the assistance with my rental. My landlord at that time told me he wouldn't accept it because the paperwork he had to complete to qualify to accept Section 8 was too invasive into his personal finances. I had to find another place to live just to be able to use the housing voucher.
I was not shown houses that heterosexcouple were shown.
I was told I would not be considered as a prospective tenant because I received housing assistance.
I am having health problems and I lost my voucher
We were broken into twice and when talking to the landlord she said that it was crazy how they had never been broken into til we moved in and at that twice. Her tone I felt was not ok. (Could just be me). Also I forgot to sign I rent check one time and she texted me stating that it wasn't "cool" that I hadn't signed it which I could care less what cool and what's not. I feel like she needs to keep it professional at all times
Managers of rental company trying to take advantage of college-aged women by attempting to charge unfairly high amounts to be taken out of the security deposit, and generally not explaining the process well enough for young adults to understand during the beginning of the renting process
Nun
Loan refusal based on young children
Once because of race. Was told all available apts that were advertised were filled. When in fact they were not. I asked a friend to go back later that day and ask if there were any spots available. She was told "yes there are and would she like to see them that same day. Another time the landlord told me because I have no credit card history I could not apply for any apartments he owned. To name a few.
I called over 25 rentals in the Iowa City, Coralville, and North Liberty area. I was on section 8 and continuously denied. Southgate has a monopoly in the area.
There are more than 1 places I was interested in that said they wouldn't accept section 8
I was not shown houses that other clients of same agent were shown.
Initially outsized security deposit was subsequently stolen from us.
It's not a technical discrimination. Limited to certain buildings because they are the few that are handicap/wheelchair accessible
The city policy has not gone far enough fast enough to insist that housing in IC be available at a variety of price points in a variety of areas and styles for those with disabilities. Witness most of the homes in the peninsula built long after the ADA.
Most of the buildings around downtown don't have elevators or a level entrance to the building and also my age or younger than 55.

<p>Denied rental applications from 3 smaller rental companies. Either gave no reason for refusal when asked or said the apartment had been rented despite the fact the apartment was relisted immediately after claiming it was rented.</p>
<p>I was the first applicant for a vacancy but they gave it to a later applicant w/o a clear explanation.</p>
<p>Trying to rent an apartment with my boyfriend while i was pregnant with our child. After showing us the apartment, the landlord asked us about our marital status and plainly stated that he will not rent to us because we were not married and he was fearful that we could potentially break up before the lease was over and cause issues for him.</p>
<p>Nothing. There is no law to describe what a non family member (guardian can do. Even an Attorney cannot advise a guardian to stop illegal actions</p>
<p>As a woman, only being seriously considered as a tenant if I disclose that I am married or if I hid the fact that I have children until later in the process.</p>
<p>I paid MORE for the exact same apartment because I made too much money and did not qualify for the lower rent.</p>
<p>Hawk's Ridge refused to rent a 1 bed apartment for on the sole basis that we were a married couple.</p>
<p>when moving to this area with our young children we found something close to where we wanted to live but as a family the landlord was unwilling to rent</p>
<p>The landlord assumed a friend and I were gay and didn't rent to us.</p>
<p>A property manager didn't give me an application for a rental I was interested in.</p>
<p>I often don't receive calls back when inquiring about rentals</p>
<p>I believe I was mistreated because I was a student. I was accused (falsely) of removing an object from a furnished apartment, and the landlord withheld my deposit.</p>

Question 12: What do you like best about your neighborhood?

A lot of families
A mix of people from different ethnic and racial backgrounds as well as economic levels. Also, right on the bus line and within walking distance to grocery store.
A very diverse neighborhood (Benton/Sunset); neighbors are nice, landlords leave you alone.
Ability to walk places like my son's school, grocery stores.
Able to walk to most places, close to downtown.
Availability of Cambus route and proximity to commercial areas.
Awesome neighbors, lots of diversity, block parties, beautiful homes/property.
Being able to live once again in IC with a descent rent.
Bus service and stores.
Clean and neighbors are great.
Clean, older houses. No apts. Middle aged owners
Close proximity to downtown, historic homes
Close to a park
close to amenities, affordable.
Close to an elementary school with great teachers—have had my oldest finish there years ago (he's in 11th now) and my youngest is in 6th grade and we've never had a bad teacher at Twain, or for that matter at SE JR High or City.
Close to campus and the downtown area.
Close to downtown/within walking distance to work.
Close to everything downtown.
Close to Hickory Hill Park
close to hyvee
Close to HyVee.
Close to interstate.
Close to kids school, neighbors are generally friendly
Close to stores
Close to treatment.
Convenient for work
Convenient to everything, friendly neighbors
conveniently located
COUNTRY SETTING
Cul-de-sac with not a lot of through traffic on the block, know most of my neighbors, mostly single family homes
Cultural diversity
Diverse community
Diverse, school close, location
Diversity
Diversity
diversity of people and it's close to stores, bike path and elementary school

Diversity.
Diversity.
Downtown or close to downtown.
Easy access to all my needs.
Easy access to lots of things-locaton
easy access to Walmart.
Everything is close by.
Few neighbors, safe
Friendly neighbors
Friendly neighbors, low crime.
Friendly people
Friendly, engaged, and we like to have neighborhood gatherings.
friendly, helpful neighbors
Friends
Good communication among neighbors and neighborhood events. Mix of ages and incomes.
good location
Good neighbors, for the most part.
Good neighbors. Near Hickory Hill Park and bus line. Walk to downtown.
Historic district. Very few rentals.
I am comfortable and safe
I can afford to rent part of a duplex in a lower density residential neighborhood.
I don't get out very much do to a disability. The grocery store is only a couple of blocks away and they deliver so that helps a great deal.
I don't live in IC. I like the quiet of the small town I do live in.
I enjoy my neighbors- mostly families. Quiet and respectful.
I like how friendly the neighborhood is as well as the historical architecture of the houses in the neighborhood.
I like the community we have with our neighbors.
I like the neighborhood but I live with family. I would like to live on my own. I can't afford housing anywhere and would Never be able to afford housing in this neighborhood.
I liked my neighborhood because its very quiet. My neighborhood has zero crime which is a major plus for me.
I live in the Peninsula Neighborhood and absolutely love it! I love it's walkability, access to the dog park, friendly neighbors and above all, proximity to downtown Iowa City where I work and spend the majority of my weekly time. I love how it is connected to the Manville Heights bus route, which I take every day to work.
Immediate neighbors are kind, social, and active in community.
In the past all the neighbors were proud of their homes which resulted in a well kept neighborhood.
It is affordable and racially diverse.
it is an actual neighborhood and not filled with college kids and apartment buildings
It is an established neighborhood --- has TREES
It is friendly and quiet.

It is quiet and I feel safe.
It is quiet, and properties are well cared for. We have many trees and access to nature.
It is quiet, country type living in city limits
It is somewhat being revitalized.
It's safe, friendly and everyone maintains their property.
It's basically pretty quiet.
It's established, residents have been there a long time, sense of community.
It's older, with character and close to downtown so I can often walk where I need to go.
Its quick
It's quiet and near Hyvee
It's relatively quiet
Its safe, good schools close by.
It's very quiet and tree-filled.
It's walkable to downtown.
Little traffic Friendly
Little violent crime. Relatively quiet.
Local to work and good school.
Location
location and trails
Location to work, quiet.
location, neighbors
Low key, not a lot of traffic
Mature trees, it seems safe
mix of ages, close to downtown
Mix of housing types and thus income levels. Good racial/ethnic diversity. Clean area.
Mixed in terms of race and age. Older neighborhood with lots of trees. Friendly neighbors. Park and trail nearby.
mixed socio-economic population; lots of trees
My neighbors
My neighbors
My son's school is within walking distance. It is not full of traffic and there is a park nearby.
Near the woods, relatively quiet.
Neighborly, quiet, plenty of trees.
Neighbors and proximity to downtown
neighbors are friendly, we look out for eachother
Neighbors known each other and socialize and plan events together.
Neighbors, quiet street
nice neighbors, across from an elementary school, near transportation & shopping
nice people
Not far from downtown, quiet, pretty
Nothing

nothing
On bus route and close to downtown.
On bus route
Quiet
Owner occupied percentage is higher than other neighborhoods
Peaceful
Peaceful, good school, good community, trees
People are friendly and we do not have homes that are on the market every year unfortunately we have many rentals and when I spoke to someone at the housing department, I was told that "my area" was not overpopulated with rentals despite the fact that 6 of the 10 houses on my block are rentals. I would like to have more residents living in the homes they are buying.
People are friendly.
people who live here are outside often, walk their dogs, walk with their kids. we have many opportunities to interact.
Proximity
Proximity to campus.
Proximity to grocery stores, bus stops, schools.
Proximity to nearby parks, quiet, family friendly
Proximity to schools, residents
proximity to work
Public transportation and a quiet neighborhood so far
Quality
quiet
quiet
Quiet
quiet
Quiet
Quiet
Quiet
Safe
Apartment close to bus stop
Quiet and clean.
Quiet and friendly
Quiet and peaceful. Friendly neighbors.
quiet and well kept for the most part.
Quiet area has some young and older folks. Convenient to grocery store, pharmacy, gas station, seamstress, and bank.
Quiet area..even tho mostly rentals!
Quiet but close to downtown. Cute houses, lots of mature trees.

Quiet but lively, with good location.
Quiet peaceful.
Quiet, close to restaurants and services.
Quiet, extremely dull, international mix of responsible neighbors, pretty stable. Good bus service. Long walk or good run to downtown. We're nearing a tipping point though as absentee landlords proliferate here. Nothing wrong with renters when they're responsible and landlords maintain properties well. College-rental neighborhoods get seedy/weedy/transient/loud, though, and that's a real problem.
Quiet, friendly, clean
Quiet, nice neighbors, close to work, older neighborhood (houses built over 30 years ago) with character and large, mature trees.
Quiet, people always out walking dogs.
quiet, within walking distance of downtown IC (25-min walk), large yards, modest houses.
Quiet.
Quieter in my unit
Quite, save, clean
Relative availability of public transit
Relatively quiet, but also active enough to meet the neighbors. And it's affordable.
rent
Resources available to me
respect, quietness, understanding, good neighbor
Safe
Safe
Safe, quite, family friendly
safety, friendliness, location
Safety, proximity to work and schools, mature trees and nature
Safety and kindness of neighbours
sense of community; proximity to local elementary school
Sidewalks! And that is by hickory hill park which is a great place to walk if only the city would maintain the trAils
So far nice!
Some of them are very friendly and welcoming.
That I am able to walk in it with little fear.
THE CLOSE PROXIMITY TO CITY BUS AND SOMEWHAT WALKABILITY TO STORES AND RESTUARANTS
The distance from the downtown area
The friendly neighbors and close proximity to businesses compatible with my interests.
The half that are social are fun to be around and there are kids that are the same age as mine to hang out with and walk to school.
The houses aren't all identical and the neighbors are friendly, even though we don't all know each other well.
The location, our neighbors, and the school
The location. I live near the ped mall and I can get anywhere on the bus with generally one bus ride

The location. Not to far from our jobs , daycare, preschool, or stores!!
The mix of ages; the welcoming attitudes of neighbors; an increasing mix of races; the ease of walking in the neighborhood and the closeness to downtown
The mix of socioeconomic backgrounds.
The neighborhood is very nice in its a lot of jobs opportunities
The neighbors
the neighbors who take care of their properties and are friendly
The neighbors, how they care for their property, walk-ability, live-ability (i.e. close to services and public transit.
the neighbors, the price of houses, nearby walking trails
the peacefulnes
The people are incredible! There is a fantastic sense of community. Old mature trees, very walkable to downtown.
the place I live at is peaceful and safe. Also I am not far from down town Iowa City, that is a bonus (:
The property management
The public transportation and easy access to amenities
The relative quiet, wildlife, previously dark skies, mature trees, modest homes, so-called scattered housing
The trees
There are schools nearby, and many single family homes that are mostly kept up well. Lots of greenery and nearby trails, plus convenient location with many businesses a short drive or walk away. Quiet except for the ongoing construction
There's a variety of people living in our neighborhood. Single people, couples and families. There are people of all races, ages, and a range of income levels. There's a wide range of house styles and sizes, some multifamily. It's safe and well-maintained, but unpretentious. It's reasonably close to downtown, and close to schools and groceries.
They take good care of me when I need it!
Tree lined streets and not much traffic
Very mixed owner occupied, with short and long term rentals, quiet old neighborhood
Walkability
Walkability and freedom
Walkability to school, bus route, some shopping, and some dining. We really miss K-Mart.
Walkability, neighbors.
Walkable, friendly
walkable, front porches, alleys with garages in back, location, neighbors
We live on the Northside of Iowa City, where we can walk to town. That is the strongest point. Also, our neighbors are friendly and we love the charm of an older neighborhood.
We respect ourselves and each other.
Well established, older homes, large mature trees, bigger lots and NO townhomes or condos. We can not stand the new homes being built, so ugly and we wanted our own space, not share a wall with someone else.
wildlife, no street traffic, cul de sac
Wooded lot, lots of wildlife.

Question 14: If you answered YES, please list where and why you would choose that area:

A neighborhood closer to me has a lot more kids. I would like to move there so my kids could play with their friends more often without parental involvement/organization.
An affordable apartment with elevator if not on first floor. Safe neighborhood
Any area that is quieter than frat circle and has units with fenced in back yards... or anywhere that isn't a propret through KMB property management
Any of them mostly!
Any residential neighborhood with a lower frequency of police presence, arrests and disruptive behavior by nearby residents.
Any safe neighborhood. But there is no affordable housing around here and the wait time for rental assistance is over 2 years.
Any where will be find
better place in Iowa City, we are not comfortable from neighbor
Close to City High School. It's a nice neighborhood and close to my kids' schools.
Close to downtown but that won't happen because of the college. It's just closer to places I like to go too do my banking and closer to public transportation.
closer to campus for parking/commute
Closer to city high area
Closer to downtown
Closer to highway 6
Closer to the campus and downtown. Ease in getting to work and classes.
Coralville
Coralville cheaper and more low income. north liberty smaller town
Could move to several other neighborhoods but have no impetus to do so.
Downtown
Downtown - want to be closer to restaurants and activities
DOWNTOWN IF IT WAS AFFORDABLE (WE ARE RETIRED ON SOCIAL SECURITY)
Downtown Iowa City, Riverfront Crossings District, and the Northside neighborhood. I also like the Summit Street and Lucas Farms neighborhoods and would consider purchasing a home there.
Downtown. Better access to bus route, better sidewalks, more businesses, places to meet up with friends/family
downtown.walk to events
Downtown; closer in to downtown on the northside; just south of Burlington St. near downtown.
East of Scott Blvd, off of Court St. Interested in moving to a condo.
East side around Scott Dr
East side or North side or Longfellow area.
East side; condition of properties, close to services and transit.
Either a condo on South East side newer building area or senior living area
Goose town/Northside. I like the way (most) of the houses were built, walkability to schools, dining, shopping, employment, bus route, downtown.
I enjoy the older neighborhoods away from downtown. Lucas farms, Grant wood, northside and more.

I like the east side of Iowa City because of the many beautiful homes and yards. There are a lot of gardens, trails and trees, and even streams that run through the area. These neighborhoods are still not far from shops and businesses, but feel more homey than downtown area and Some surrounding neighborhoods which have taken years of wear and tear from college living. Some parts of the east side aren't as safe as others, however..
I once lived by the new St Patrick's church in East Iowa City. I would like to return to the quiet, orderly neighborhood given the finances.
I would like to live closer to Longfellow. I like the older homes and quiet streets.
I would like to live in the northend of town where you are farthest from the factories like P&G which emit terrible smells and chemical toxins into the neighborhoods.
I would like to live on the upper east side of Iowa City because the houses are larger there and my family is out growing our home. But I can not afford the house prices in that area.
I would like to move farther from the center of where many of the students live due to the amount of noise I deal with regularly
I would like to move more toward downtown. It would be easier to walk to.
I would want an area that has mostly homeowners who want to keep up the neighborhood, not temporary renters who don't have any desire to improve the neighborhood.
I'd like a different area, but with limited income, I can't afford other apartments
I'd like to downsize to a smaller home, but there is limited housing available in my price range.
Iowa city , Iowa apartments
Iowa City has a lot of nice neighborhoods, when we were house hunting, we looked in many neighborhoods around town.
Iowa City neighborhoods closer to UIHC or University Heights so as to limit commute time and commuting hassle/issues.
Just need a bigger place still want to live in Iowa city
Just outside of town, less environmental chemical interactions
Lemme, Downtown
less densely populated, houses farther apart
Lincoln area or north Iowa City. Still happy where we are too (Eastside)
longfellow
Longfellow Neighborhood, Northside/Goosetown, or North Iowa City in the Shimek district.
Longfellow or northside. Neighborhoods are historic and well-respected. Housing is too expensive over there, however.
Lots of different areas interest me for different reasons
Low rent because income does not cover all the bills. Supporting a daughter.
Lucas Farms neighborhood, closer to work
Manville Heights - character and charm
Manville Heights, South Summit, Cardinal Road, The Peninsula
may need to move to one level in the future so newer condos or senior housing
More activity downtown area
More walkable
Near a bus stop, so I can get to places easier and more independently
Near my parent on the west side.

Near of in Downtown
New apartment building bulit
North Liberty.
North of Bloomington and west of Governor.
north of City High. Nice older area
North of Iowa City
North of the hospital because it's less busy on game day
Northside, such as Brown Street—it's quiet, beautiful, historic, and not as filled with undergrads.
Northside--walking distance of downtown and the university.
Not sure of name but north, closer to wooded sreas, where fewer nondiffused LED street lights exist, there's more wildlife, ad more quiet
Out in the county. Would love to be outside the city on an acre or two.
Peninsula
Peninsula, Tag Drive area around the park
Prefer single family not connected to anyone
Ranch house near Coralville lake.
Saddlebrook, Friend's House
Shimek, Manville Heights, Longfellow, Goosetown, Northside - proximity to downtown, trees!
Since I arrived in IC in '82 I was always fortunate enough to live within walking distance to dwntrwn. Loved every minute of it, until the old landlords sold the building/house. Then rent would triple, very sad!!!
Somewhere closer to the University campus with affordable rent and decent housing conditions.
somewhere further from a school to avoid all the noise that comes with that.
Southside.
The northside neighborhood. There are so many parks and it is close to downtown.
The peninsula
There are several nice areas in iowa city, house costs determine where we are able to live. We both work full time bringing in \$140k a year together and we can only afford a \$240k home.
Tiffin
To the beautiful, very expensive, condos all over downtown
University Heights - safety and quite, residential neighborhood. Not next to an interstate/traffic noise.
Updated homes
Want to be closer to job.
We last rented in the Longfellow area. We would have liked to buy a house there but found this house first and got a great deal.
Windsor Ridge neighborhood. Less crime.
Would be nice to live closer to downtown area and in an area with lower crime than current neighborhood
would love to live in an older neighborhood

Question 16: Please check whether you think more is needed for each housing type below.

A law to keep guardians from taking personal property from wards. I have kept a journal
Affordable housing for families with poor credit history/evictions on record, better-quality, affordable housing
All of the above
Equitable housing or desegregated neighborhoods (both racially and based on SES)...mixing of housing types spread more evenly across the city.
For senior housing - staff that is on site more than once or twice a week.
Higher priced housing to add to the existing mix of low income housing. It would improve the image of our neighborhood.
Homeless no car with 1year old baby
Homes (not apartments) that people making under 80k can afford.
Houses that are assessed fairly on property taxes.
Housing for disabled people who also have a criminal record
Housing for non students that is affordable
Housing for people who are not exceptionally wealthy, exceptionally poor, or a college student.
Housing for single men with kids
Housing for students
Housing that is maintained.
I generally think prices in Iowa City are prohibitively expensive, which impacts seniors and disabled folks.
I think there needs to be more urban living options in downtown and Riverfront Crossings District that are appealing to millennials (not student specific), retirees and empty nesters. I would like to see more buildings that are mixed use like the Chauncey, Park@201 and Plaza Towers.
I'm a landlord. There's no reason for people to be charging \$1200+ for a 2br apt except greed - you don't need to charge that much to make money. Would have checked 1st-time homebuyer, but reality is that if you need that much help, it's unlikely you can afford to maintain a property.
Low income and affordable housing
Lower income housing, as well as low income services, being spread throuout the city and not just on the east side of Iowa City. Putting the majority of low income houses and services on one side of town creates ramifications that are often detrimental to a particular area. That is currently happening in Iowa City. We have good public transport options in the city; low income services can be spread around so that all of Iowa City bears the consequences and benefits of having these services. It's unfair to do otherwise, and possibly even discriminatory to put the majority of low income housing and services in only one area of the city.
Middle income range
Mixed neighborhoods - more families in close in neighborhoods
more diverse neighborhoods, please!
More housing based on income
More single family dwellings
Much better public transportation and service on Sunday(not limited time) same as the rest of the week.
My mortgage is the same cost as a one bedroom apartment
none

NONE
provide a property tax rebate for families that maintain their homes
Redevelopment of intern stand alone housing for families buying their first home and for modest incomes.
Renting with pets
Section 8 needs to find out who in the household has disabilities.
Seniors and low income pay too much rent when they don't qualify for Section 8 housing - the "ones" who make just over the requirement for help.
Single income housing (\$600 or less/mth)
Small places walkable to downtown that are charming!!!
The cost of rent in this town is ridiculous, especially given the ages and income of the population. Something needs to be done.
we have several assisted & special care homes in area

Question 18: Do you think the following are barriers to fair housing choice in Iowa City?

Affordable housing for retiring middle income seniors can't compete with the student housing market.
City of Iowa City eliminates makes housing unaffordable thru zoning laws that are too strict and unconstitutional.
Do not allow persons to come into a persons home and dispose of personal assets
housing for seniors/disabled people, i.e., Capitol House, not allowing people w/criminal records
hypocrisy/ not a very welcoming community
Infrequent rental inspections leading to unchecked power/negligent landlords
Iowa City and are is WAY TOO EXPENSIVE to live in
Lack of housing without physical barriers
Lack of proximity to services, jobs and transportation
Large deposits, too high credit score. Why is it a 2 1/2 year wait in Iowa City?
Limited middle income options
Low income housing. "Affordable" is often out of reach for poor or not affordable to people like teachers, police officers, etc.
Lower income housing is all clustered into certain neighborhoods
NOT ENOUGH AFFORDABLE HOUSING FOR SENIORS
Not enough affordable housing in places that are centrally located and also not in the midst of student off campus housing
Not enough affordable rental housing for students
not enough equitable distribution of public transportation in predominantly low-income housing areas.
Not enough overseeing of landlords
Property taxes are too high and make housing unaffordable.
Really long waiting list. Especially for families that need the assistance right away.
Reduce the time it takes to apply for housing assistance. Last time I tried to apply for housing assistance I was told the wait would be 3 years. That was awhile back, I never came back. I need assistance then not in 3years!!!
Removal of older homes in favor of large, expensive apartments
Rules preventing small groups of unrelated seniors from sharing housing
Some neighborhoods are Starving and that is not a joke or a lie.
Takes too long to get on waiting list for section 8. DVIP leaves people homeless due to not having funds to help you get a home
The above answer "Neighborhoods that need revitalization and new investment" seems to me a sneaky way to ask people to have their neighborhood gentrified. Let's not encourage revitalization/new investment unless we are revitalizing a neighborhood with the intent of creating more quality AFFORDABLE housing options. The quarters, was a tragedy.
The city needs to stop breathing down the necks of landlords and instituting ridiculous rules. Rental properties are a HUGE tax base in this community and it's like you're trying to run all the owner out of town.
The rental housing not only needs to be affordable, but QUALITY too! Too many run down and unkempt rental properties, with landlords that are only doing the BARE minimum to maintain their properties! Too many landlords in Iowa City don't care who they rent to, as long as the house is

occupied & it has running water, electricity, then it seems they don't care how run down the houses become. Look at 719 and 816 and 814 Bloomington streets for instance.

To many low income options, need more for middle class

you have not defined what you mean by affordable housing

Question 19: What do you see as a major obstacle to fair housing choice in Iowa City?

"Not in my backyard" mentality of neighbors
1. Good ol boys. 2. 35K students with access to student loans. 3. Racism. 4. Absentee landlords failing to maintain properties well. 5. Reality of crime levels in housing-project neighborhoods & resulting nimbyism. 5. Weakness of our mixed-use neighborhood situation. Mixed-use and mixed-income go together well. Mixed-income when there's no reason to walk anywhere seems to be weird and segregated by income within the neighborhood.
A huge part is zoning and the failure of the city to plan and work with the school district in those plans.
accessibility, affordability
affordability
Affordability of housing for families not on public assistance
Affordability; transportation; very, very low vacancy, changing IC housing rules
affordable housing is too clustered in certain areas. Needs to be spread out in all neighborhoods, including affluent ones
Affordable rentals
Affordable rents
Age, accessibility for disability people
Aggresive redevelopment and access to mobility friendly houses.
Allowable growth rent
Alot of people are homeless in Iowa City living day to day
Artificially rising values due to city and developer actions.
Attitudes
availability of reasonably priced homes/apartments/rentals
being able to find affordable housing for a family
Bureaucrats who try to jam low income housing into higher income neighborhoods. The people who worked hard for their property don't want people living next door who trash their property because they have nothing or little invested in it.
Busing and outdoor swimming pool
City leaders giving away to much TIF money to those who built housing w/o demanding more apts ne available for low income people. I still see new apts with first floors open for businesses to rent and they have been vacant sometimes for 10 years!!! Or were never even attempt to find businesses to fill those open spaces. Why? Because no follow up on these owners to fill those spaces. That's on are city council and other city officals who work for the city. No true representation for lower class individuals.
City requires soooooo many rules that cost an investor. So rent rates are based on this concept.
City state and federal government regulations
Clusters of low income housing makes neighborhoods decline and is hard on the schools.
Community oppositon to fair housing
Cost
cost
cost
cost

Cost
Cost
cost and availability
Cost of living in general. Iowa City is so expensive.
cost of rent for alot of people who have low incomes, large family's not being able to get a fair deal on a place to live. Also people with Disabilities getting turned down because of liability reasons, and greedy land lords charging people a fortune to rent.
Cost of rentals
Cost! Taxes!
Cost.
Cost. The housing costs in Iowa city are absolutely ridiculous.
costs
crime in areas where housing is affordable
Demand exceeds supply
Denial by landlords.
developers option to pay into fund, instead of a requirement for affordable housing in a development.
Discrimination and affordability.
Discrimination on the part of land lords and Realtors
Discrimination, poor quality rental options, affordability of rental options, predator rental companies, lack of options for families, overemphasis on high-end student housing, lack of resources for those for have issues with their rental property
Distance. Fair housing is being squeezed out by high end student housing. Cool stuff is only built close to downtown, and we cater too much to wealthier people.
Enough low income housing.
Enough units with housing with more reasonable rents.
equal distribution of public transportation across the city and of various housing types. stop focusing development on new high-end apartments; or if that is going to be the focus, increase the requirement for developers to balance that housing with affordable housing, too. do not concentrate low-income housing in only a few areas. balance it across the city.
Exploitative rents. Aspire at West Campus costs \$1100 a month for a very cheaply built rental, and it replaced affordable housing.
Few affordable or low income options, very racially segregated
Gentrification of neighborhoods, background check discrimination
High cost of housing and run down rentals mixed into neighborhoods.
High cost of housing in Iowa City.
High cost of housing.
High cost of rentals
high housing cost, mediocre public transit
High prices and High property taxes
High prices in Iowa City area
High pricing of property
High rent cost for single individuals on low or fixed income

High rent in close-in neighborhoods
High rents
High rents and high housing prices
High rents and purchase prices
Home and rental costs, along with property taxes
Homeless people
Housing is 1/2 again as expensive then other nearby city/towns
Housing is more expensive than households can afford
Housing is too expensive. Income based housing is unsafe or undesirable to live in and not enough section 8.
I beleive Iowa City could develop more affordable housing for low income residents.
I dont know never live their but want to
I have some concerns about the ethics of a number of local landlords.
I just want to cry when I wrie this as I have suffered over 17 years of not having stably housing for my daughter and I. No one believed the out of state doctors for our disabilities. We were turned away from programs and lived in shelters. No support! No connection to resources, no help to fill out housing applications.
I see a lot of people that needs fair housing choice
Ignorance and fear of THE OTHER!
Income
Income\cost
Influx of students every fall - they need somewhere to live too
Iowa City is to focused on controlling the type and amount of housing and not on the cost. Also affordable housing requirements have a huge loophole that allows delvopers to buy out of the requirements but never actually develop affordable housing.
Iowa rent fees increasing very rapidly, becoming not affordable.
It seems as if there is a lot of student housing and a lot of luxury condominiums, but very little of quality in the middle.
It seems like the age-old problem that demand in a university town drives land, rental, and housing prices up.
Lack of affordable housing especially starter and downsizing properties
Lack of affordable units
Lack of available low income housing
Lack of diversity. We have concentrated moderately priced housing in a few areas that discourages diversity and concentrates populations that might be discriminated against. The recent anti rental laws reinforce this systemic discrimination.
Lack of safe, we'll-maintained and affordable options
Landlord monopoly
Landlords
Landlords who need not honor local laws, are not held accountable ever. High cost of housing and rentals especially for seniors and disabled.
Landlords wont accept sec 8 and developers wont build affordable houses/low income housing. The city caters to middle to high wage earners and students in this city and its evident by the clusters of class/income neighborhood

Latent racial bias. Even many people that believe that they are progressive, have subconscious racial biases.
Limited affordable housing accessible to people with disabilities
Location of low income housing. I would like to see low income housing on the north end of town rather than more affordable housing on the south side
low density, restrictive zoning, high demand
Low to middle income housing options
Main problem is that in capitalist system resources are allocated based on wealth, city cannot change this.
Mainly not enough reasonable, affordable housing.
More and more expensive places and less and less affordable, low income, disabled housing
More housing close to jobs
Most affordable options eaten up by students who move in and out frequently and don't invest in their neighborhood or community, because they plan to move away when finished with school.
Move in cost
n/a
Need afford low income housing
NIMBY syndrome for low-income housing or public housing, and the type of back-room deals that are essentially gentrifying parts of SE Iowa City now.
Not being able to get what I need for housing.
Not enough affordable rental housing for small families
Not enough choice for low income individuals and families.
Not enough housing, long wait list.
not in my backyard, development costs
Not really sure. I haven't been here very long. I do see a need for more senior housing that's affordable. Most of us are on a fixed income and cannot afford much.
not sure
Objection to building heights. It is simple math that when we build more, prices will go down across town. We need to stop opposing building heights and instead work with developers to create more mixed use, and inclusive buildings. The Chauncey development under construction is a great example. When finished, it will be a huge draw for all residents of Iowa City, complete with free park space, a hotel, restaurant, bowling alley, FilmScene movie theaters, cafe, and apartments and condos with immediate access to the Iowa City Farmers Market.
Options for rich and low income, middle class gets no help and few options
Outsized influence of real estate developers. Focus on high-priced apartment buildings rather than affordable housing.
Overpopulation
people not wanting to take section 8 or similar programs
People with disabilities and seniors can't find enough housing.
People with lower incomes don't get treated fairly
Political will
Predatory landlords who ignore fair housing policies and fail to upkeep housing.
Price
Price inflation makes home ownership prohibitive for many, especially in areas with strong schools

price of homes/rent
Price of housing in good neighborhoods
price; support from social services to help families move into and stay in homes
Prices. Rent is so much more in iowa city i can get the exact thhing in coralville north liberty for a cheaper price. But i want to live in iowa city
Property taxes
public will to provide
Quality Jobs and Misguessing the Market
Rent is too high, not enough section 8 options
Rent prices
rental cap makes it difficult for families to move into some neighborhoods
Rental costs are inflated
Rental prices and landlords afraid of Sec.8
Rising cost with fixed income or inability to increase income, insufficient availability of assistance.
Rising costs, lack of affordable housing
smug rich westsiders who think they need to live in a gated community
Snobbery as a university city
Socioeconomic and racial discrimination
Some landlords not upkeeping property, unfairly treating renters by overcharging and not maintaining property, radon testing and mitigation should be available for all and mitigation should occur for levels greater than acceptable for health
student housing
Student housing in desirable downtown locations and rising home costs.
The "not in my backyard" mentality is huge in this town. The areas that are being developed do not include rentals for people who are working for minimun pay, are not convenient to those low paying jobs they have, do not have bus service at certain times of the day. Apartment builders who are getting TIFs and have said they will have low income housing need to live in the real world becasue these apartments going up now and renting for per person rents are NOT affordable to low income families BUT are in areas where there are things like better schools in our district, shopping, regular bus service, etc.
The amount landlords seek for rent. Being a college town, housing is in demand.
The City Council and Supervisors need to see it as a priority to make housing available to everyone even the homeless. Very little effort is made to find housing for the homeless.
The city has zoned to concentrate both wealth and poverty. The bus system also deserves mention.
the cost of land and construction, bigotry
The cost of rentals and home prices is much to high. It is pushes those with lower economical status out of the city and in to more rural areas where there is less resources.
the disparity in where affordable housing is actually available and where there are actually jobs and resources
The economic segregation of the various demographics
The high cost of living.
The high rental prices for homes, most of which are in bad shape and in need of repairs.
The huge gap between high income earners and lower income people. Also, the low incomes of those on disability. Lack of housing for people with criminal backgrounds

The huge waiting list
The major obstacle is that there is almost no affordable housing available, and the minimal amount of affordable housing that exists is poorly maintained, it doesn't matter that it is illegal, landlords know that there are not other housing options so tenants only option for the sub-standard living conditions are to keep quiet, or become homeless. Not to mention that it is nearly impossible to keep housing once you have attained it, as landlords crush tenants under unliveable burdens, which force them to spend all of their energy working to pay for inadequate housing and making said inadequate housing surviveable. No person is able to see past month to month pay check living when in this situation (think Maslows hierarchy of needs). If a landlord forces somebody out, they may get an eviction on their record and never be able to find suitable housing again, because evictions cannot be expunged from the record. Families are unable to find assistance until they are homeless, never before they are homeless and the task of finding a place is nearly impossible.
The new builds of off campus student housing, especially that that is advertised as "luxury"
the overwhelming bias toward business over individual citizens
The rental market that has been allowed to take away homes from families with children, causing over inflated prices and unavailable homes
The rents are crazy high.
The separation of low income housing and the accessibility to affordable housing.
The student population keeps the cost of housing very high.
The university
The view that "fair housing" should mean "free taxpayer provided" housing
The waitlists are too long.
There is not enough affordable housing in general.
Too many contractors wanting to make BIG money
Too many developers building high end rentals and houses.
TOO MANY HIGH COST BUILDINGS GOING UP AND NOT MUCH FOR AFFORDABLE LIVING FOR LOW INCOME PEOPLE INCLUDING SENIORS. WHO IS BUILDING FOR THAT GROUP? WE HAVE ENOUGH LUXURY STUDENT HOUSING
Too many landlords focused on students and university staff
Unattractive housing that effectively segregates by race
Unfair leases that require you to renew way to early into the lease. Lease renewals should not be required more than 60days before lease ends. Currently some starting asking in October for people to renew.
Unmet need for affordable housing
Whir privilege

Question 21: What can the City do to create and ensure fair housing choice in Iowa City?

A city can build or develop more hobs for its residents along with more affordable low income housing.
Actively test for discrimination (identical potential tenants of different characteristics calling landlords, etc.)
Advocate for those who need assistance with understanding the system- work with landlords to keep them accountable to maintain properties fairly for all
Affordable prices
affordable renting units, studios
Allow for more rental permits, make stricter rules for landlords, make more public resources for tenants to find out about fair housing laws.
Application process faster
Are you really interested?! These same questions have been asked over and over in the years I have lived here. Buildings/areas of town that were once afford able have been torn down with replacements out of touch with what someone in with a low income can afford. The few choices that are availble to those with low incomes are dumps with landlords that do not can to do any upgrades. I have been in apartments that students and families moving to town from small communitites are living in and it is unbelievable that thwese places are allowed to be rented.
Ask for input from citizens
Avoid favoritism.
balance fair housing sites. No concentration.
Be fair with individual financial crisis
Become more flexible
Better bussing. Perhaps smaller busses that go into neighborhoods
Better choice by use of vouchers
Build housing for people with disabilities that someone can actually afford
Build housing for the less fortunate to call there home
Build more affordable housing
Build more affordable housing
Build more city-owned affordable housing. Limit the influence of outside real-estate developers with profit motives.
Build up pockets in all four corners of Iowa City that are manageable but have the same value.
caps on rent
Cheaper
Connect, help fill out applications. At Section 8, need to give list out of all Section 8 landlords.
Control rental and housing costs; ensure more affordable inclusion in new residential buildings and areas.
Control rents. Allow for more dense housing around the downtown area.
Crack down on the rents and have inspectors do a more thorough examination of rented homes so they will actually cite the owner for problems. Example, absence of a storm window after a window unit was previously removed creates a safety issue as one window is all it takes to break in and it is on a side of the house mostly obstructed from view. Outlets should also be tested as several in the house I rent are not grounded.
create a range of housing in ALL Neighborhoods

Create more low-income housing with similar amenities as the high- price places
Create more quality affordable housing, create a program to "rehabilitate" those who have been evicted, make sure tenants are informed of toxins within homes, have city inspectors more thoroughly inspect houses, send out a questionnaire with utility bills about the quality of housing and how to have unresolved safety issues followed up with, more protections for tenants, decreased gentrification of neighborhoods or increased regulations in "revitalizing neighborhoods" about the amount of affordable housing, rental cost caps, or laws that do not allow landlords to add \$100 to your rent each year, more education for tenants and low-income families about their rights, social workers specifically tasked with advocating for people with insufficient housing, programs focused on helping people stay in their housing, rather than rehousing them once they become homeless.
Decrease rent.
dedicate more affordable housing with all new housing going up
Define affordable housing to mean very low income housing.
Demand better landlord tenant policies, support ideas to increase and sustain a living wage and that residents are grossly underemployed in the area
Different Council members, for one, who actually understand this issue.
Disperse social services throughout the community creating multiagency locations
Distribute section 8 and other affordable housing options evenly through all neighborhoods so one neighborhood doesn't get stigmatized. A percentage of all rental housing should be affordable based on income and protected from discrimination. Not just on new builds.
diversity of development.
Do more new builds that are section 8 project funded (like Autumn Park or Capital House Apartments)
don't let NIMBY neighbors have too much sway in making decisions
educate everyone on rights and responsibilities
Enable rental limits for apartments
Enact and enforce policies and regulation to assure that everyone is able to secure the housing they want.
Enact policies that promote diverse neighborhoods so the rich don't hide in expensive subdivisions
Enforce existing policies. Lower barriers to complainants. Support and fund moderately priced housing in every project and neighborhood.
Enforce regulations on lenders, property managers, realtors, etc, don't discriminate based on race or ethnicity.
Enforce rental \$ caps on single family homes
enforce the balance of affordable and high-end housing across the city. either provide more low-income housing for large families or require landlords to be more lenient when it comes to total # of tenant restrictions.
Enforcement.
Equal rights
Fair housing should be part of development and housing conversations from step 1.
Financially encourage complexes and builders to create good, low income places. Have a limit on how many tall buildings there can be downtown, and restrictions on the number of high income rentals in Iowa City
Find a way to regulate costs in a reasonable manner. Rental companies are charging absolutely ridiculous prices for units in abysmal condition.
Force development to include mixed price housing, even in areas with high median-home prices.

Frequent inspections of rental units to insure tenant safety and to insure tenants are treated fairly by landlords.
Get a new administrator for ICHA.
Get together in build a building for the homeless
Have “open neighborhoods” —like open houses. An opportunity for friendly neighborhood residents to showcase their neighborhood by offering visitors a tour, a look inside a few average homes and available apartments, a picnic meet -and-greet, etc. Let me organize this! :)
Have a higher % of low-income housing; remove parking space and common area space requirements for rental housing.
Have more people accept section 8 housing.
Have the landlords lower their rents. I used to live in Fort Madison, and rented a nice 3 bedroom house for 40 dollars less than I pay for a small 2 bedroom apartment in Iowa City. I'm a mother of 3 and wish I could afford to rent a 3 or 4 bedroom place.
Help people find and keep jobs; continue and increase support to families in need
Help the UI build dorms, rehabilitate existing housing- please dont just build bad high density housing that doesnt fit the haracter of the rest of the city. Please dont make all the single families live in dorms while thr college kids live in 100 year ood ainglw family houses rented by slumlords.
I do not know
I don't know but I'm glad you're asking the question.
I don't know..... provide incentives/support to landlords to rent to familes/people who are low income.
I feel the City has to return the favor (Namely, having Old Capital the Mall Revival) at least having TRUE Safe Zones, even though we are not the Same Team/School/Band.
I found they educate landlords if we can get them into the H.A. Offices
I wish I had the answers! Forcing builders to allow for affordable units is a good option; I wish there were more of this.
I wish I knew the best answer to this
If new high rises and apartments are built near downtown where everything is, there need to be affordable options, not just the extraordinarily expensive ones for transient citizens/students.
If you build it, they will come. Also, police need to leave my black neighbors alone. ☹
Inclusionary zoning
Income gaps are too wide. A lot of affluent citizens that drive up the cost of housing. Economics 101, income of residents drive housing up. Hard to create policy to reduce residents income levels.
increase affordable home ownership programs, increase rental assistance, continue enforcement of discrimination rules, inclusionary zoning, programs focused on residents who have been left out of the housing market
increase cost to developers to opt out of creating affordable housing through payment.
increase density, use tifs for housing
Increase min wage
Increase the amount of rent limits
increase the number of affordable homes
It maybe to late, all meaningful employment revolves around the University and by giving corporations to come in and dictate their terms, you've given away all good property close to dwntwn and abandoned families and minorities.
Less regulation and taxes

Less subsidized housing that is attracting out of town people who bring in crime
listen to what the real issues are and stop being so political
Lower cost of living.
Lower rental prices families
Lower the property taxes and fairly assess homes on value, not sale price.
make building a house more affordable. adding more affordable home supply to bring down demand
make more section 8 vouchers available and require owners not to discriminate against low-income people
make renting affordable for everyone idk how else to answer this question.
Make the list more available and faster
Make/develop more housing for those on fixed, limited income such as the disabled, elderly
Mix and build more low income housing with higher income housing.
More incentives for rental agencies that seek to provide quality housing for low income families.
More programs like Univer-city in other areas like orchard /bryn-mar. Also have city buy those apt blogs SE corner of Melrose & Mormon trec and redesign that housing to look more like the peninsula but more affordable. Most people want to be proud of where they live
More section 8 housing and busing
Need apartments and condos for individual in the \$600.00 a month range.
Need to give voice to ALL residents, not only those of have the resources to participate in forums, etc. Go to where the people are to learn about their experiences and insight and continue to advocate for them as time goes on. There needs to be a collaboration with the university to balance the needs of students and residents and that does not mean segregation. Thoughtful conversations about intertwining all communities needs to happen.
Neighborhoods with a mixed range of income.
Nice clean affordable housing I am a single Mom with 2 boys. I work but in no way can afford rent and utilities. I have to dependent on my parents which is causing them financial difficulties. I don't know what to do. If not for parents, we would be homeless and it's getting close to that point now.
not allow landlords to raise rent because of the college, allow people with less than perfect credit get a place
Not much, a high level of government regulation and unfair forced compliance will alienate landlords and homeowners
Offer first time homeowners assistance regardless of income
Offer subsidies or tax breaks for landlords who offer lower rent.
Prohibit rejection of tenant based on section 8 status.
Properly selected, educated, and maintained task force
provide assistance to low income
Provide tax breaks to lower income folks so housing cost are affordable to them. Provide yearly tax breaks based on income to maintain a house. Encourage lower taxes for all if fair housing is your goal. Businesses associated with providing access to housing for residents recoup their costs by charging higher fees or prices; people looking for housing do not have this option, so provide them with that option through tax incentives or credits. Having money makes everything fairer for everyone.
PSAs to educate landlords?
Public declaration followed by action
Quit seeing only the dollars to be made for the city and care about the people who live here

Remove the homeless off of the streets so neighborhoods feel safer.
rent control, improved access to public transit so people don't have to choose between mobility and affordable rent
Repeal the cap on single family homes being used as affordable housing for students.
Require all landlords to offer housing based on median income for the area they are renting in. There should not be a large increase in rent just because of the students who are mostly funded by loans and not actual income earning potential.
Require developers to rent to more than just 1 or 2 units for low income/affordable. Close the loophole where they only have to do that for x years.
Require fair housing in all subdivisions as they are built.
Require greater percentage of low to moderate cost housing when developers want to build luxury housing. Support more efforts like Habitat housing. Try new ideas like Tiny Homes developments for homeless. Support efforts by Successful Living to house disabled population. Help them be successful.
Require landlords to accept section 8
require new buildings downtown to have true affordable housing. An condo home at \$250,000 is not affordable housing.
Require that all new multi-family development projects make a certain ratio of the units available at reduced cost to applicants who are at or below poverty level.
Require that all new neighborhoods include a mix of affordable housing and include some low-income housing options as well.
Revise and enforce rules for landlords. Regulate housing costs
Revitalize neighborhoods and increase public transportation access in outlying neighborhoods
Rules on developments requiring percentages of affordable units in all buildings with more than 6 units
Spread low income housing throughout the city and make sure the low income housing is truly affordable.
Spread out the options
Stop allowing university housing to drive rental rates.
Stop bankrolling developers who don't provide sufficient affordable housing
Stop building condos and apartments geared towards college kids, invest in housing for local families and people below median income
Stop building expensive, dense student housing.
Stop having big companies come in and build cookie cutter homes that sell for way more than they are worth. As well as stricter guides on accessible housing because as it is now it is almost non-existent and more and more people are having to leave because of it. Also the prices need to be lowered. Not every person that lives in Iowa City is a doctor or professor, or a student (that parents support). There are many people living in Iowa City that are below the poverty guidelines and deserve to have a roof over their heads.
Stop lumping together all the low income/section 8/Habitat For Humanity housing in one part of town; create more diverse neighborhoods throughout IC
STOP PROVIDING INCENTIVES TO BUILDERS, DEVELOPERS AND BUSINESSES THAT ARE CATERING TO THE WEALTHY
Stop ruining neighborhoods by throwing up businesses everywhere; be a bit more realistic around historical preservation (vinyl siding vs peeling paint...)
Stop trying to force higher income neighborhoods to accept low income residents as neighbors. I can walk through my neighborhood and tell you at a glance which properties are owned and maintained

by people who can afford them, and which properties are occupied by people who have nothing invested in them. Usually low income people who have been given a handout. No pride of ownership brings property values down.
Stream line approval processes for developers, implement form based zoning
Talk to legislators about what is wrong.
The landlord to accept me.
Unsure
Visit other States, make developers have a percentage of their buildings be low and affordable rents.
We need affordable, one bedroom apartments
We need to have better paying jobs available for all of our residents and we do need to bring down the price of housing without screwing landlords.
What ever they can
Why should the city do anything? It's the applicants responsibility [
Work with developers to create first floor housing in buildings where there are empty storefronts (particularly those owned by Apartments Downtown and the Clark Family) and be more business friendly to developers who want to create dynamic projects in our city.
Work with the school district to see areas where more affordable housing is appropriate

Question 22: Please share any additional comments regarding fair housing choice in the space below:

Add more low income housing
Allow for multi family housing construction as a matter of right in now locations across the city.
As a city with a very favorable rating for a retirement location there are not many good options for retirement housing for those with modest retirement funds.
As soon as I can retire, I plan to leave this area. I face bankruptcy every day. Too expensive to live here. I try not to go to the grocery store. Otherwise, I can't pay bill
Better education/informaiton on maintaining a home and especially a yard. Stop removing free parking spaces around residential areas, like College Green Park
Deal with real issues and start being consistent, all peolpe want is a fair opoutunity
do not place it all in one location, diversify
Encourage landlords to maintain properties and to update amenities if they can. Storage sheds, dishwashers, and washers and driers can really help a person's living situation.
Equal rights
Fair Housing needs to be done. It means Safe Schools and Neighborhoods
Great expirience.
Having to pay for a rental application and then get denied because my credit isn't high enough is a double edged sword and causing me and my daughters to end up homeless
Help out when needed
I am a 62 yr old grandma raising elementary age grandkids , one with autism. affordable housing for us is non existent.
I am a single, disabled, senior the amount awarded is just not enough for housing rental in Johnson County
I feel lucky my apt qualified for section 8 and a non-discriminating owner
I have not experienced housing discrimination but your survey does not reflect this. You have "if you answered no" and there is not an option to indicate that I haven't experienced discrimination, only reasons for not reporting.
i hope that this survey is provided in other languages and marketed to residents of varying demographic backgrounds so as to get a clear picture of where IC is falling short. I think overall we like to think of ourselves as a friendly, educated, welcoming, middle to upper class constituency and by doing so we fail to recognize the growing diversity in race, language, immigration status, education level and SES, etc. That then does a disservices to residents who are in need of fair housing choices and other social services.
I need a apartment really bad
I need help please.
I want to keep my home
I would love to believe that something will come of this survey; that people will make changes to help those who do not have a PhD and work at UI making a six figure income but I highly doubt this will go anywhere.
I'd be down with rent control experiments.
If an apartment offers lower rent because of low income, that rent should be the rent for everyone. It is unfair to pay more rent for the same apartment when I have a full time job, pay taxes and support the welfare that assists the people living next to me paying half the rent
If the city is going to hand out vouchers or other aid to people who can't afford housing, then the city should take the responsibility to make sure the recipients of the aid take care of the property an

surrounding area. No furniture in yard, no junk cars parked in yard, no trash and refuse accumulation.
If this is just an us against them, victims versus oppressive evil landlords and property owners, then it will create further animosity.
I'm concerned about the segregated nature of our community.
In order to not create ghettos where the low income and disabled folks are sequestered, it is important to spread the affordable housing across the city. And to do new, quality builds so that there are new, nice buildings for the people who society tends to forget.
Iowa City is a great place to live, but much harder if you are poor.
Iowa City is facing a housing crisis that must be stopped, which can happen via a collaboration between tenants and the city.
It is a crying shame that so many beautiful, older homes close to the downtown and campus are overrun by students. They are destroying some beautiful homes. Students also make it hard for families to find decent, affordable housing since most of the rentals are designed to have three or four students splitting the cost of the \$1,200+/month rents. As a family that values peace and quiet, we also have to move further away from the campus to find something we can afford and also to avoid being around homes hosting late night drinking parties.
It seems like the city housing authority had a lot more programs to encourage and assist first-time homebuyers prior to 2008. I understand that the financial recession really set back the housing market, but it seems like the city has still has limited assistance to help new buyers navigate the process. For example, the city used to have first-time homebuyer workshops. I went to one and it was really helpful - I think it was the last one they held, and that was about 10 years ago.
It seems like there better apartments on the eastside and downtown those can be being made downtown but not so much on the eastside
Landlords turn away from offering Section 8 because they claim the government takes too long to pay them. Our neighborhood went from diverse in 2006 to virtually all white in 2016, and 50% of our block is rentals.
more desirable low income housing for Senior Citizens
More funds towards low-income housing w/ extra focus on the disabled.
More transparency around sanctioned rental companies would be useful to renters. More resources for renters in general. A big problem is these companies cater to and exploit young renters and that also makes it harder for families and non student aged renters to find quality, affordable housing.
None
North Liberty has more affordable housing options, but no transportation options
Not enough affordable housing that accepts pets
NYC has a great system for fair and affordable housing.
Places like Town and Campus, Pheasant Ridge and former Lakeside shouldn't be allowed to deteriorate to the degree they have. These are slums run by slum landlords. However, poor people don't have good options.
Require people to live in the area longer AFTER they get their vouchers. Quit allowing people from out of State to take the voucher BACK out of state
Some landlords are incredibly corrupt. I don't know what to do about that, but it's truly awful to feel you have no options but to stay in a situation where you're being gouged.
Something needs to change!
Stop allowing developers to buy out of the affordable housing requirements this is being done in the rivers crossing area and it is impacting actual affordable housing being created.

Stop letting people from Chicago coming here getting vouchers for housing and taking it back to Chicago.
Thank you for your work on this.
Thanks for doing this.
Thanks for the survey!
Thanks for your efforts.
The cost.
The fact that city council puts a rental cap on their neighborhoods clearly demonstrates that rentals can be/are a problem. Yet the city continues to inflict more rentals and social services on the south side. This has decimated what should be a blue collar working class area
The middle class struggles in Iowa City, while not at all to the extent that low income families do, but it's real and I am one of them. There are limited option for families to purchase a home in the neighborhood they choose for under \$250,000
The starting point has to be more affordable options, people cannot advocate for better conditions or fair access if there is nothing that is accessible.
There needs to be more options for people with disabilities to live in the area. Having a wheelchair, I am personally unable to access areas due to no sidewalks, too expensive to live in certain buildings. There needs to be an incentive for first time landlords to get more landlords to take Section 8. Development of better quality apartments for the disabled and seniors.
This survey is asking the wrong question at the wrong time. The problem with the Iowa City housing market is not that people are being discriminated against in the first instance. The problem is that there is not enough housing and not enough affordable housing. The University of Iowa has caused rental prices to soar and they bear no responsibility. We need affordable housing. Then we can ask questions about whether or not people are being discriminated against. At the point, people don't even have the opportunity to be discriminated against because there's no places available to be denied based on race, religion, gender, etc. Additionally, the vast majority of public assistance is not available until someone is already homeless. The system needs to change so that people can get help before they're already on the streets.
Too little to late. How many minority/small businesses where given the same opportunities. Did the City of Iowa City really try to help those minority businesses the same playing field? The answer is quite obvious... NO you did not!!!
Use the term attainable housing rather than low income housing
We need to get away from the pockets of low income housing all grouped together. More options for downtown.
What about the availability of recycling services for people living in buildings that are more than four units? I was told the city passed an ordinance requiring landlords to provide recycling for all residences regardless of the number of units? I want to recycle but I don't have a car!
Would like to see a stop sign on first ave and hickory trails. Traffic would always down

Appendix B

Public Comments

Kirk Lehmann

From: Guhin, Ann <ann-guhin@uiowa.edu>
Sent: Tuesday, August 20, 2019 11:01 AM
To: Kirk Lehmann
Subject: Comments on Iowa City Affordable Housing Draft
Attachments: Comments on Affordable Housing Draft - AG.docx

Ann Guhin

Journalism/Environmental Policy and Planning Student, University of Iowa

Direct: (563) 650-1304

20 August 2019

Section: Public Sector

Subsection: Planning, Strategic Planning

Priorities listed under the “Strategic Planning” section of the referenced draft includes “promote environmental sustainability”. However, an adequate description of how environmental sustainability would be implemented is not provided in the length of this document. Issues surrounding energy efficiency and indoor air quality are impacted by long-term city and regional planning – and those socioeconomically vulnerable are the most likely to suffer from poor planning decisions that do not take into considerations these factors. In order to truly make housing more affordable for the most vulnerable among us, we must first ensure that our LMI residents are not making a tradeoff between more-affordable housing costs and less-affordable healthcare or electricity/gas bills.

Further, it does not matter is a home is just merely “affordable”, but whether it will remain affordable and safe of the residents. According to a [Fine Home Building article regarding building science](#), insurance claim for mold damage from US homeowners exceeded \$3 billion. Now, most major insurers don’t even cover mold damage, leaving homeowners to front the bill. Mold poses a serious health threat and can cause, or exacerbate the symptoms of, asthma – causing another significant and unexpected monetary blow to LMI households. Provision of affordable housing is not enough if we do not define was is the necessary quality of the affordable housing we are providing.

Finally, the most vulnerable among us are likely to be the first to suffer from the effects of the current climate crisis, meaning they are most likely to have to spend exorbitant amount of money in cooling their homes and/or tending to the health effects of a warming climate if they are not able to do the prior. It is imperative that the city outline the quality in regards to energy efficiency and building quality for affordable housing; otherwise, the entire efficacy of affordable housing programs is compromised.

Section: Public Sector

Subsection: Zoning & Development Codes, Distribution of Zones

It is noted that 81% of residential land in the city of Iowa City is zoned for single family development, and when including land zoned ID-RM and ID-RS that is not yet developed, the ratio increases to 90%. The author goes on assert that this ratio of single-family development to other zoned areas is not necessarily a barrier to fair housing choice because City Zoning Code is permissible enough to allow for densities that are affordable. The assumption that housing density is the greatest indicator of housing affordability is a fallacy and logically flawed.

Historically, in Iowa City, housing prices depend on the perceived desirability of the housing in question – this includes size, location, proximity to amenities, ease of alternative transportation, etc. If one were to assume that density of residences is a significant indicator of affordability, a newly constructed apartment in Riverfront Crossings should cost less than a three-bedroom tailor home in any surrounding area – yet, it is not. Because housing markets are determined by perceived desirability and other complicated factors, simplifying housing affordability to merely “density=affordability” only does the residents of Iowa City you are attempting to help a disservice.

Kirk Lehmann

From: Kelcey Patrick-Ferree <kelcey.patrickferree@gmail.com>
Sent: Monday, August 19, 2019 12:29 PM
To: Kirk Lehmann
Subject: Fair Housing Choice Study Feedback

Kirk,

Thank you again for your work on this report. I so appreciate the excellent work you and other members of our city staff do.

In general, I have no comments on what is included in the report--it is very thorough and considers the problems from many angles. However, I have some concerns about what is missing. I have the following comments on this report:

1) Given that the City's goal is in part to reduce economic segregation, I was expecting to see more about encouraging a mix of housing types in *all* existing neighborhoods, meaning encouraging new higher-income development through investment in existing LMI neighborhoods in addition to encouraging availability of LMI housing in existing higher-income neighborhoods. While this strategy was discussed, it was not given much time or nearly as thorough a discussion as other strategies. I am concerned that it will fall by the wayside if it is not more thoroughly explored, either in this report or elsewhere.

2) The report seemed hands-off regarding student housing issues. E.g., poor income-to-housing ratios were more or less attributed to use of loans or other non-income sources of funds for paying for housing absent any data. This is problematic. While it is certainly too late to add anything to this report, I hope that the city will make efforts to gather better data on these issues, and therefore be able to offer better solutions to student housing problems, in future reports.

3) The report notes, briefly, that the responses to the survey skewed toward higher incomes. This indicates an issue that I believe was problematic throughout the process of gathering this information and creating the report: It is not necessarily accessible to the populations it is meant to be helping. I am a well-educated native English speaker, and this was a great deal of information for me to wade through in my free time. Foreign-born, low-income, non-English speakers are identified as one of the more vulnerable populations in the report. It is far from clear how these individuals are expected to provide the city with information and feedback about the problems they face and whether the report accurately reflects them, publicity for the report notwithstanding. The executive summary did not particularly help this problem. I believe future iterations of the study itself should be part of the efforts it recommends at p. 179 (regarding language barriers/communication) and 181 (regarding data collection) to improve this issue.

4) I saw nothing about certain bad behavior from landlords/property managers. For example, many have unreasonable and even illegal lease terms. I had a lease once that required me to vacuum twice a week. That was merely silly for an able-bodied college student, but could be impossible for a person with mobility disabilities. I am also aware that the issue of nearly all leases in town ending a few days before the next lease cycle begins is ongoing, as it has been since I was a UI student 15+ years ago. These lease terms are potentially significant impediments to fair housing that did not get a look at all. I am aware that there have been court cases resulting in ordered changes to the terms of some leases, but I am also aware that the issues are ongoing notwithstanding, based on informal discussions with Legal Aid attorneys. I believe the City should explore what its role could be in addressing these issues.

5) My personal observation has been that city boards and commissions whose missions are not directly linked to fair housing / desegregation issues can be very dismissive when fair housing / desegregation issues come before them. The City Council cannot adequately implement its fair housing and desegregation goals when it is getting recommendations

from boards or commissions that do not take them into account. I encourage the city to add fair housing and desegregation to the criteria these boards and commissions must consider when making decisions, to the extent they are not already included, or to improve training on these issues for members of boards and commissions.

Thank you again for your hard work and attention to these issues.

Warm regards,
Kelcey

From: Cheryl <cherylcruise@aol.com>
Sent: Tuesday, July 23, 2019 12:20 PM
To: Tracy Hightshoe <Tracy-Hightshoe@iowa-city.org>
Cc: Geoff Fruin <Geoff-Fruin@iowa-city.org>
Subject: Fair Housing Choice Study 2019

Tracy,

I finally waded through this report. Kudos to staff who put this together over countless hours! It is much better than the 2014 model. Comments:

1. I wish that margin of error was mentioned because the report gives the illusion of precision. As an example, 2013-2017 median income for Asians is 26,997 +/- 9,128. Hispanics should be 45,285 +/- 8,832. Black income is 27,667 +/- 6,441.
The ACS gets about 1.6% of population each year and for the 5 year period there are only about 7% of all households surveyed. There is no precise data.
2. Rent may have increased 25% before inflation but property taxes went up lots more than that. An example is at 427 S. Van Buren with 6 apartments unimproved. Taxes went from about \$10,000 in 2010 to \$17,000 due now. I think that is a 70% increase.
Apartments got hit much more than condos. Property tax can be 1/4 to 1/3 of the rent.
3. As we think of "group living options for students" to increase affordability I wonder if ACS can capture this data. A student at the Quarters will lease one bedroom for \$550 in a three bedroom apartment. How will the survey be filled out? Multiple buildings are now leasing by the bedroom. In the 2013-2017 data 7.2% report rent that is less than \$500.
4. As I have previously stated, I believe that developer subsidized affordable units in IZ should be rented at 30% of income (as our city definition states) using LIHTC rent tables rather than the volatile, less than 30% of income Fair Market Rent tables. That would be more fair.

There are a couple typos in the report but I am sure they have been found.

Thanks for all the work!
Cheryl Cruise

Sent from my iPad

Kirk Lehmann

From: JOHN MCKINSTRY <adisciple0040@msn.com>
Sent: Thursday, June 27, 2019 7:35 PM
To: Kirk Lehmann; Sara Barron
Subject: Re: City of Iowa City's Consolidated Plan and Fair Housing Study

Kirk,

Your comments about the document I shared with you are entirely accurate and insightful and have been very helpful, thank you. Because these Federally-required plans/studies are often used to guide or inform even the use of local monies, I would like to submit the comments below- not as an HCDC Commissioner or a JCAHC member/President but just as an individual citizen and mainly for the purpose/hope of raising the local profile of MH as an affordable Housing alternative. I have highlighted an editorial addition.

Peace

John McKinstry

Fair Housing. The City must affirmatively further fair housing by analyzing local impediments to fair housing choice and taking action to overcome those impediments. In addition, plans must estimate the number of families who need housing assistance by categories including different income levels, persons who are elderly or disabled, single persons, and large families, and must identify areas with racial or ethnic concentrations and/or low-income households. MH is an important housing resource for many of these target populations, and as a result, preserving and improving MH communities is important to furthering fair housing choice. Although the protected classes provided under Federal Fair Housing legislation and the additional protected classes provided by Iowa State law and City ordinances apply fully to people who rent MH or MH park lots, those MH renters do not have the same or equal rights and protections as other housing renters under local ordinances and State law. For instance, MH residents may be evicted for no cause and may be notified of rent increases as little as six days in advance.

Affordable Housing. Affordable housing is a key topic for the City. MH is a vital source of affordable housing, but MH in investor-owned communities are at greater risk of loss, principally by conversion to commercial development. In describing the City's affordable housing needs and how the City will address them, the Plan should include provisions for the preservation of the City's MH. Furthermore, using new MH can help expand or upgrade the existing stock of affordable housing.

Neighborhood Revitalization. The Plan must identify local areas for targeted revitalization efforts including long- and short-term objectives for physical improvements, social initiatives and economic empowerment of low-income residents. Assisting residents in purchasing or improving their MH community can be a cost-effective revitalization effort. When residents own their communities, they maintain and improve the common areas. If a community's infrastructure has deteriorated, CDBG funding can enable residents to tackle the problem when they purchase the community. Furthermore, homeowners in resident-owned communities exercise self-governance and have a greater investment in the community. Once the land under their homes is secured, their homes become true assets. Placing MH on fee-simple land is also a cost-effective way of revitalizing blighted neighborhoods. Many communities have demonstrated the benefits of using MH as replacement units or infill as part of revitalization efforts.

Anti-Displacement and Relocation. The City must minimize the displacement of households and individuals from their homes and neighborhoods due to HUD-funded activities. A low- or moderate-income (LMI) person who is displaced as a result of activities in the plan is entitled to relocation assistance such as moving expenses and, in some cases, a rent subsidy. The City must also provide one-for-one replacement of LMI rental dwelling units that are demolished or converted to other uses die activities funded under the plan. If the Consolidated Plan contemplates displacement of homes from a MH community, this should include one-for-one replacement of those rental sites and the homes if they are unable to be relocated. Otherwise, MH communities can be at risk of HUD-funded redevelopment which can cause households who are least able to replace their lost homes lose a major asset, and affordable housing is demolished without any replacement. Even better, the plan should not displace MH community residents.

Infrastructure of MH Communities. Annual Action Plans identify projects that will be undertaken with CDBG funds over the coming year. Infrastructure improvements for a MH community where at least 51% of the residents are LMI are eligible for CDBG funding. Obtaining CDBG funding for this purpose can help residents finance the purchase and improvement of a MH community; in some cases, it may be a crucial element of a conversion strategy.

Conversion of MH Communities to Resident Ownership. Priorities for HOME funding are set by the Consolidated Plan. Due to the reasons noted above, direct HOME funding for resident-owned cooperative conversion should be made available if necessary. This could include encouragement by the City for MH communities to form Community Housing Development Organizations (CHDOs) to allow access to the 15% of the HOME allocation that is exclusively available to CHDOs, and the additional 5% of the HOME allocation that may be used for CHDO capacity-building activities.

MINUTES

PRELIMINARY

**HOUSING AND COMMUNITY DEVELOPMENT COMMISSION
JUNE 20, 2019 – 6:30 PM
SENIOR CENTER, ROOM 202**

MEMBERS PRESENT: Megan Alter, Charlie Eastham, Vanessa Fixmer-Oraiz, Christine Harms, John McKinstry, Peter Nkumu, Maria Padron and Paula Vaughan

MEMBERS ABSENT: [Vacant]

STAFF PRESENT: Kirk Lehmann, Erika Kubly, Geoff Fruin

OTHERS PRESENT: Crissy Canganelli, Marjorie Willow, Christine DeRunk

RECOMMENDATIONS TO CITY COUNCIL:

By a vote of 7-0 the Commission recommends City Council approve the 2019 Fair Housing Choice Study (Analysis of Impediments to Fair Housing Choice) with amendments as discussed during the meeting.

CALL MEETING TO ORDER:

Vaughan called the meeting to order at 6:30 PM.

APPROVAL OF THE MAY 16, 2019 MINUTES:

Harms moved to approve the minutes of May 16, 2019. Fixmer-Oraiz seconded the motion. A vote was taken and the motion passed 6-0 (Nkumu and Padron not present for the vote).

PUBLIC COMMENT FOR TOPICS NOT ON THE AGENDA:

None.

DISCUSS CITY STEPS 2025, THE CITY OF IOWA CITY'S CONSOLIDATED PLAN FOR 2021- 2025, WITH MULLIN & LONERGAN ASSOCIATES:

Kubly introduced Marjorie Willow and Christine DeRunk, from Mullin & Lonergan Associates, consultants from Pittsburg to help the City create the five-year Consolidated Plan which outlines the goals and priorities for Federal CDBG and HOME funding.

Willow began by giving the Commission an overview of what the consultants had done this week noting the City must go through this process every five years because they receive CDBG and HOME funds and HUD requires this planning process for the City to identify affordable housing and community development needs and to go out into the community for this process. The consultants facilitated seven stakeholder workshops, which were topic based to create a variety of meetings for stakeholders with broad topics like workforce development, housing for those in crisis, healthy homes and healthy neighborhoods, etc. This allowed for discussion to contain many different subtopics. Willow stated each workshop had around 20 stakeholders attending, there were some same faces at the workshops but also new faces at each one. Many organizations showed interest in two or three topics. The consultants will compile the information obtained and present it in a document that will enable the City to identify the priority needs moving forward. This is important because each year of the five years when the City

submits its annual plan to HUD the funding must be consistent with the identified priorities. For example, if affordable housing is a priority, applications for affordable housing must be deemed consistent. Willow noted they also held three public meetings, one at the Broadway Neighborhood Center, one at the Pheasant Ridge Neighborhood Center, and one at City Hall. Willow stated this is the third time they have worked with Iowa City on the five-year plan and noted the needs are similar but the intensity of the needs is greater as is the number of people who need services. The cost of housing increased, and wages have either stagnated or actually declined. She added they have seen this similar trend in many cities across the country, but each community has local nuances. For example, Iowa City's student rental market impacts the overall housing market tremendously. Willow noted from what she has heard this week, in her opinion the three most significant needs are affordable housing, public transportation, and childcare. Just thinking about the cost of childcare and if it could be provided at a higher level, it could have an empowering economic impact on families with children because then parents could work or go to school fulltime, there are many things that they could do if they had affordable childcare at a higher level, it is a significant need (along with public transportation). And of course, affordable housing is needed, rentals, ownership for single individuals without dependents or disabilities that need affordable housing as well as families, etc. Willow stated they received some valuable information to incorporate into the Consolidated Plan to make it unique to Iowa City. This Plan will be available for review by the new year so entities applying for funds can see the identified needs and tailor their applications accordingly. Willow also noted there is a survey available for feedback as well through July 19. There is also another survey just for nonprofit agencies to survey their public facility or capital needs for the next five years for budgeting and planning needs. That survey is also due back to the consultants on July 19.

Eastham asked if the Consolidated Plan is limited to just the two sources of funds (CDBG and HOME) for addressing the needs within the City. He noted the Plan can also include local tax funds as well. Willow said it can include those as long as they are funding eligible activities, as an extension or supplement to the Community Development Block Grant or HOME activities.

Eastham asked if now is when Staff begins to put Plan together and it won't come back to this Commission until later this year. Lehmann said it will come back to the Commission in November, hopefully in time for the December round of CDBG and HOME funding rounds. Lehmann noted they plan to add in Housing and Community Development programs that the City already funds (e.g. Aid to Agencies) and incorporate into the Plan.

Fixmer-Oraiz asked if the consultants saw anything unique to Iowa City not seen in other communities, possible solutions or ideas. Willow noted that in Iowa, the state legislature has prohibited the city from doing things on a local level which is a hindrance, however she noted the City has found creative ways to work around it, which is similar to what Austin, Texas, also does. Because the housing need is so great here and the income limit is so high, it is work to get affordable housing in the area, but she noted having the developer contribute housing is a great solution. In terms of things other Cities do, they often fund code enforcement, use TIFs, or use CDBG to apply for Section 108 loans which is an extension of the CDBG program that allows cities to borrow up to five times the entitlement amount. Some communities use that loan program to increase their ability to make significant differences on projects. Lehmann noted to use the loan program it has to be incorporated into the Consolidated Plan in advance. Willow said there is an application process and if it is not in the Consolidated Plan then there would have to be a substantial amendment. Willow noted Iowa City is progressive in the way it tackles affordable housing and the different types of activities it funds. Just last week she was in Bloomington, Indiana, and used Iowa City as an example of success.

Eastham noted Iowa City has used its zoning power to increase the development of housing in the Riverfront Crossings area and while most of that housing is not affordable to lower income housing folks the City requires some affordable housing in those developments. Additionally, it allows developers to pay fees-in-lieu and that is a different way of obtaining money to do affordable housing in a stricter legislative environment. Eastham hopes Iowa City will include the affordable housing plan in the Consolidated Plan. He said there has not been a city-wide affordable housing requirement yet, only in Riverfront Crossings.

Vaughan asked if the Consultant's report contains other entities, such as the University, or just the City. Willow said they had a couple University representatives at the stakeholder workshops. For example they

had a nurse from the University who is involved in the Healthy Homes Grant and another who attended the affordable housing and equity session who works with fair housing. Vaughan asked if there was any direct tie-in to health conditions and research. Lehmann said the Healthy Homes session tied into that as well as walkability and physical activity, among other related topics.

Lehmann asked if there was anything the Commission felt needed to be included in the Plan.

Padron noted the Commission has heard for a few years childcare should be a priority of the City and she feels we are not doing enough. She would like to see a solution to childcare affordability. Fixmer-Oraiz agreed noting it is the second biggest barrier to economic sustainability. Padron stated it especially affects women. Fixmer-Oraiz added it's not just for women and families, it is an economic issue and how kids will do in school (early childhood development), and kids are coming into kindergarten already lagging. Additionally, there is also the economic issue of people opting out of the workforce because they cannot afford childcare or don't have transportation to get their children to the one or two openings for affordable childcare available within the city. Because of how the State administers childcare vouchers, many providers are reluctant to open more affordable spots because they are not getting recouped from the State. Childcare is a problem, just like affordable housing, and is crippling to a community.

Fixmer-Oraiz asked if the consultants have seen creative solutions for childcare issues. Willow replied not specific to childcare, there are many barriers to it, such as risking breaking a lease because of caring for neighbor's children and they also heard it is financially difficult to run a childcare taking only childcare assistance because it is not enough income to pay staff. Willow noted all communities are in the same boat with childcare, it is costly and sadly the people who take care of our most valuable possession are the ones we pay the lowest amount although we depend on them to do such an important job. She knows of no one has figured out a way to make it work financially so it is sustainable. Fixmer-Oraiz noted during WWII, childcare was federally mandated and paid for, so it has been done in the past. It seems all these issues, like childcare and healthcare, should be able to be addressed.

McKinstry noted a couple of strategies for increasing the stock of affordable housing that maybe other cities have used and one would be tax abatement. He noticed the tax abatement committee didn't feel including affordable housing into private developments was a viable option. However having nonprofits own or manage affordable rental units that are rehabilitated and become part of the affordable housing stock is generally less expensive than building new. The other option would be to use manufactured housing, not just mobile home parks, which reduces costs per unit and can be owned by individuals. McKinstry would like to see those items addressed in the five-year plan as something to look at. Willow has not heard of other cities doing either of those two things to increase the affordable housing stock, one thing that is catching more common are community land trusts. A nonprofit organization that acquires land, especially in high cost areas, and the cost of that parcel is removed from the cost of the construction of the total project which makes it more affordable. It also preserves or extends the period of affordability whether it is a 99 year lease or whatever the case might be. There is also the opportunity to make it for commercial uses as well which gives an opportunity for small business owners to be part of a community land trust. Lehmann asked if community land trusts were typically publically owned or nonprofits. Willow said they are almost exclusively nonprofits.

Eastham said The Housing Fellowship has done community land trusts in the past, but in over 15 years, they stopped because after the 2008 financial crisis Sally Mae and Freddy Mac stopped doing secondary loans for land trusts. If the City adds land trusts in this consolidated plan it must address whether secondary financing is available to homeowners when they decide to sell with land trust provisions.

Eastham noted on the childcare issue, he thinks it would be good for this Consolidated Plan to look at whether current zoning regulations interfere with the ability to locate in-home and center-based childcare businesses throughout the community. He is not sure it is a problem but suspects it might be. Lehmann stated what they have heard from people they talked with is it isn't so much the zoning or home-based business issues as much as issues with leases and ability to have home-based daycares in rental units. Eastham asked if the City can prohibit certain lease regulations that are deterrent to the public good. Lehmann said that would be a City legal issue and does not know. Eastham said someone should speak to the City Attorney then as it is a possible provision to put into the Consolidated Plan.

Fixmer-Oraiz asked if there were any affordable SRO (single room occupancy) units, like Coralville has with the Iowa Lodge. Lehmann asked if she meant like Shelter House owned. Fixmer-Oraiz said it could be private. Lehmann said there are still some but not that many, the zoning code is generally restrictive to group living uses because they are leery of fraternities and dorm-style housing around downtown. Fixmer-Oraiz said it would be interesting to try to do something like that, treat it like the Affordable Housing Location Model and have the ability to locate such housing away from downtown. She feels it would be an option for single people who need affordable housing and sometimes short-term housing. She recognizes it can be hard to keep those units as nice spaces for people. Harms noted that is what the old YMCAs used to provide. Vaughan noted the concept is popular now in areas like San Francisco where housing is expensive. She wonders if people would have an appetite for such housing in this area. Eastham noted that is a case where zoning regulation is possibly prohibiting a possible housing type.

Padron stated the consultants did the Plans five and ten years ago and wondered what Iowa City has done well and what needs to be improved. Willow stated the City has not been doing anything wrong, the most important point is that problems have gotten worse, through no fault necessarily of the City, but because the cost of housing increased and incomes either stagnated or went down, the cost of housing is outpacing what people earn. The magnitude of need is greater even from 10 years ago. All those problems could not be resolved because there is simply not enough money to address the issues. Willow noted with the funding sources the City has available from HUD, the City is doing a good job, and Iowa City is unique in that it goes above and beyond by providing funding such as Aid to Agencies and requiring payments in-lieu-of and trying to find financial resources to address those problems fully realizing that what's coming from the federal government is not enough to address the problems. Willow stated Iowa City is does a good job, there is just not enough funding to address everything.

Fixmer-Oraiz asked since the magnitude of the problem is so great and the City is doing a good job with what they have, but there still isn't enough money to solve the problems, how much worse off will the City be in five years. Willow acknowledged that is a good question with no answer, there are just too many unknowns. Such as when the City did their 2005 Consolidated Plan, they had no way of planning for what happened in 2008 with the flooding. The best laid plans are great, but it is difficult to plan for catastrophic events. She noted most communities are concerned with that, continuing to make progress in critical need areas when a natural disaster or financial downturn happens. Then resources (staff, time, money) are spent on fixing that problem before being able to go back to what was being done on a regular basis.

Eastham objects to that statement about not enough funding, that there is adequate funding in the community to remove all the family households who are now paying more than half their income for rents from the situation. He stated the funding is available, yes they would have to increase property taxes to do so, which would be tolerable to most people in this community, the problem is the City doesn't have the guts to do it. There was a Council meeting where Eric Theisen called the Council members a bunch of cowards and he was right, Councils have been cowards. The City has the means to fix the problems, just like the school district fixed their school facilities problems, the issue is doing it. Eastham doesn't want to see anything in this Consolidated Plan that talks about needs that are impossible to meet, he will object to that language. This community survived the 2008 flood, the money came from the federal and state government to support the cleanup from that disaster, the flood did not affect affordable housing issues at all. The affordable housing need is measured in terms of percentage of households that are paying more than half their incomes in rent, and that has increased steadily since 2005, but has not gone up dramatically. The City's needs are not too great that they cannot be resolved.

McKinstry noted the ability to tax is limited by the State so they would have to borrow money.

Padron noted the City is not doing great and was hoping the consultants would have more ideas or a different response than what they are hearing today. Fixmer-Oraiz agreed and noted it is hard to sit on this Commission because at times it can feel they are not doing enough and they can also only give recommendations to City Council but what they are trying to express is their desire to do what is best for the community. She appreciates what Eastham is saying as she heard just today that in 2008 the City was one of 30 cities across the nation that wasn't actually impacted by housing economic downturn. This is why so many developers are keen on coming to Iowa City because our market is so strong.

Eastham noted the way to avoid demoting things is the data, to understand what exactly the problem is with housing and childcare and transportation in Iowa City and how to resolve those things. And then make an assessment on whether there is sufficient local money to make up for what the federal and state governments are not doing.

REVIEW AND CONSIDER RECOMMENDATION TO CITY COUNCIL ON APPROVAL OF 2019 FAIR HOUSING CHOICE STUDY (ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE):

Lehmann noted it is a 200 page document but hopes they were able to read the executive summary as well as chapter 5 which notes the impediments and recommended solutions. He added that public comment for this document extends past this meeting so if they have comments later, send them to him and he will incorporate those before getting the document to Council. Lehmann briefly reviewed the presentation he showed at the last meeting. He shared the slide that discusses what the Fair Housing Choice Study is, it is technically part of the City's method of affirmatively furthering fair housing which includes planning for fair housing needs within the community. Fair housing choice is the idea that everyone should be free from illegal discrimination and is guided by federal, state and local laws, and the local laws are the most comprehensive (race, disability, gender, sex, marital status, familial status, etc.). In Iowa City public assistance as a form of income is also a protective class. The goal is to foster inclusive communities. This document gets updated every five years to try to identify impediments to fair housing choice, identify strategies to combat identified impediments, and to incorporate that into the planning processes for activities they to overcome barriers.

Lehmann next reviewed the executive summary. The public input began in October, with 330 contacts with the public through stakeholder and public meetings and a survey. It also looks at quantitative data from the Census, the Home Mortgage Disclosure Act and other local datasets. In the survey, one thing that really emerged was only 43% of respondents felt they understood their housing rights, only 37% knew where to file fair housing complaints, 26% said they experienced discrimination of some sort since moving to Iowa City but only 3% reported it which shows a gap in knowledge about where to file and why. Many responded they didn't file because they felt it wouldn't do any good or they didn't have the time to deal with it. Many people who responded said public assistance as a source of income was the largest form of discrimination which shows it is still an issue and alerts the City they need to reach out to tenants and landlords. The biggest impediment to fair housing choice identified was lack of affordable housing. Other top impediments were displacement due to rising rents and discrimination by landlords/rental agents. Moving forward in terms of timeline, Lehmann noted they are in the public comment period now.

Fixmer-Oraiz asked where the survey talks about City policies that may act as barriers to fair housing choice. Lehmann said he heard that people or agencies didn't feel the City was always basing funding on the Consolidated Plan, so the City needs to make sure funding follows the priorities identified in City Steps. Additionally, having revamped the Aid to Agencies process factored into some confusion on funding processes. Zoning and housing codes were also identified but are more specifically addressed throughout the plan. No public policy item on the survey passed the threshold of more than half.

Padron asked what the timeline was for public comment. Lehmann noted they are in the public comment period now until July 16. Any comments anyone has can be sent to Lehmann and he will compile them and include responses in the appendix of the plan. There will also be a public meeting on July 16.

Eastham said there were three public sources of information to draw on in assessing the findings of this Study, is one source better than another. Lehmann feels the public meetings are similar to focus groups, the same type of input, and in-person meetings are better for in-depth of information you will not get from a survey. However both are valuable and he would not weigh one over the other.

Lehmann next discussed the general demographics, housing, economic characteristics, noting Iowa City is more diverse, it's growing, and it's younger, tends to have less persons with disabilities but tends to have more foreign populations as well. In terms of economic profile there are relatively high incomes paired with low incomes, part of the low income group is a large student body; however not just students

have low incomes. Overall the poverty rate in Iowa City is 28%, if you remove students it is 11.5% which is higher than the state average once students are excluded. The housing profile is notable because Iowa City has a large renter population, focused near the downtown, homeowner vacancy is 1.4% and rental vacancy is 2.7%, but there is a higher overall vacancy rate because many units are not currently for sale or for rent. There is a lot of new development and housing is more expensive which paired with low incomes creates cost burden in the community. Students are most impacted, but persons of color are also impacted. In terms of fair housing enforcement, outreach is the big thing, as noted in the survey many people don't know or feel comfortable reporting or have the knowledge which are barriers.

Therefore, Lehmann noted four major categories of impediments identified that could use improvement. First is housing choice, there needs to be improved housing choices in Iowa City. The second is facilitating access to opportunities, there are some disparities across the City and they need to try to help balance that. Third is increasing education and outreach, as noted from the survey results. And fourth, operational improvements which encompasses several other items that didn't fit into other strategies.

For improving housing choices, staff noted four strategies that would help. First is facilitating a range of housing types, including zoning for diversity of housing and encouraging different types of housing within zones. Second is lowering the cost of housing generally, so beyond needing more multifamily zones or allowing different types of housing in single family zones, this recommends things like perhaps lowering the cost of rental permit fees or other items that may affect protected classes at higher rates. Additionally, looking to keep people in their homes because that is often more cost effective in terms of increasing the diversity of the housing stock and not allowing them to be priced out of their homes. Rehab is another option, to invest in the housing stock to address disproportionate impacts and to keep people in their homes. In addition, having an eye on the student population and seeing if there are alternative living arrangements that could make it more affordable to live in Iowa City as a student. Strategy three is to continue investing in affordable housing, Iowa City funds affordable housing but needs to continue supporting and producing it throughout the community, including affordable housing of high quality. Strategy four is to retrofit housing for equal access, specifically for persons with disabilities. For example, if someone needs to put in a ramp, modifying the zoning code to allow it rather than going before the Board of Adjustment, also providing funding for such needs and trying to think of different ways to improve aging in place and quality of life for persons with disabilities in their homes.

For facilitating access to opportunity Lehmann noted the housing that often has the best access can often be more expensive, including downtown Iowa City and areas with transit routes. A lot of the affordable or available land is on the edge of Iowa City, so there is a need to find high opportunity areas of the City and encourage affordable housing to be developed there. Strategy one is emphasizing variety in areas of opportunities, similar to facilitating a range of housing types, but more focused on areas where affordable housing should be developed such as with access to transit, proximity to jobs, or better access to other opportunities/amenities. Strategy two is community investment. While the City encouraging new affordable housing in certain areas they don't want to neglect other areas, so a balanced approach is needed to encourage access in areas of opportunity while continuing to invest in the other areas of town (looking at rehab dollars, investing in assets in LMI areas, improving transit, improving services, etc.).

Eastham noted in the text regarding strategy two (page 15) it states "Currently Iowa City appears to experience disparate access to opportunity especially when it comes to access to jobs and high performing schools" and Eastham noted any school board member would say there are no low performing schools in the Iowa City Community School District and he agrees and feels that phrase is not accurate. Lehmann noted that was discussed as the plan was developed, that text came up while reviewing a table produced by HUD for the Assessment of Fair Housing which was going to be put into effect and it lists opportunity indicators by race and ethnicity including a school proficiency index (page 132). The table used data based on the levels of 4th grade students and neighborhoods with higher or lower performing elementary schools nearby. Eastham noted it doesn't show the school district's evaluation of their schools. Lehmann agreed, he used the table when making that statement, as well as job proximity as an area the City needs improvement in. Eastham noted proximity to jobs is a quantitative measure. Lehmann stated he can modify the sentence about the schools and just say "disparate access to opportunities and community investments". He continued that transit and development are connected are important to ensuring equal opportunity for access to the community. Beyond transit, also walkability

and bike-ability. McKinstry suggested Lehmann modify the statement to read mobility linkages.

Impediment three is education and outreach. The demand side awareness was for tenants, homebuyers, people looking for loans, anyone who uses/needs housing. They need to pay special attention to these populations because they are not often organized and don't have the education compared to providers.

Fixmer-Oraiz asked if it mentions specifically translated materials. Lehmann noted that is strategy four, language access. This comes up frequently, especially with the higher foreign populations Iowa City has. Fixmer-Oraiz asked who the City uses for translation, because the issue with the Arabic right to left thing is basic and that should have been correct. Lehmann said that the consultants provided the materials and he doesn't know what service they used for translation. Kubly noted that the City usually uses someone The Housing Authority has connections with (Omnilingua). Fixmer-Oraiz noted her work with Johnson County has an agency they use. Lehmann also noted the police department has a list of informal translators that could be used, though he only just became aware of this.

Continuing, Lehmann said regulator awareness is also important. Making sure boards and commissions are aware of items and knowing where to refer people to when they have issues or questions.

Impediment four is operational improvements, looking at administrative process and regulations that may stop projects or affect protected classes. Also looking at administrative processes outside of Iowa City because they operate in a larger region, so they need to work collaboratively. First to review implemented procedures and regulations, making sure they make sense for nonprofits and those applying for funding. Second looking at unintended consequences as new things get developed, such as rental caps, etc. Third, improving in data collection as local programs have not historically tracked protected characteristics. Finally increasing fair housing enforcement and transparency, trying to better track outcomes for fair housing enforcement, ensure the outcomes are brought to the public, people are aware of tenant and landlord rights, etc. Also want to circumvent some of barriers to reporting fair housing issues and to do some testing for protected characteristics.

Fixmer-Oraiz asked if any on-the-ground verification was done. Lehmann said it was most recently done in 2015. They are looking now at the best way to gather information to see if people are being denied for one reason or another. He noted there may be some partnership opportunities.

Eastham requested to remove the word transparency in strategy four, it is clear fair housing enforcement is a substantial thing the City needs to do better at as seen in the survey data. He noted there are landlords that are not playing by the rules and refuse tenants with public assistance income and the best way to get them to play by the rules is to sanction them.

Alter asked what enforcement looks like, what is the penalty. Lehmann said it is a legal process, a complaint is filed, Human Rights gives landlords an opportunity to respond to the complaint, and then follows through its process. Eastham noted there is a complaint enforcement mechanism, and perhaps Council needs to look at the mechanism to see if it needs to be updated.

Harms noted it is the individual or prospective tenant that must file the complaint which is not being done as seen by the survey results. Eastham said relying on complaints for enforcement is a bad idea, they need to do testing. Harms said as someone that went through a landlord/tenant discrimination she did not want to file a complaint in fear of losing her housing. Lehmann said that was heard from stakeholders. Eastham asked if the complaint procedure is a City law or required by State law. Lehmann said there are due process requirements but is not sure at what level the regulations come from. Eastham stated those questions should be asked and addressed in the Fair Housing Choice Study.

Fixmer-Oraiz feels the word transparency should be kept in the statement, but perhaps it should read improving fair housing enforcement and transparency. Lehmann stated transparency is important, they want to be able to show it is a fair process and then more will use it.

Vaughan asked if there is a safe place for people to go if they file a complaint, is there a person assigned to them to help them through the process. Lehmann said the complaint is filed at the City and the City

investigates. It is illegal for landlords to retaliate against a tenant who has filed a complaint.

Fixmer-Oraiz asked if the strategies were prioritized or just listed as one through four. Lehmann said they are not in priority order, if the Commission feels that is important they can do so. Fixmer-Oraiz said after this discussion it seems fair housing enforcement should be listed as priority one if they are prioritized. The process needs to be improved so people feel safe that if they file a complaint they won't be retaliated against or booted from their homes.

Fixmer-Oraiz noted under facilitating access to opportunity it notes access to jobs and transit, is that an area where access to childcare could be added because that is a huge impediment when looking for jobs. Lehmann agreed it would be a great to add, they did hear in some of the Consolidated Plan meetings the lack of daycares in certain areas of the city. Lehmann noted he will add as an opportunity that people should have access to.

Lehmann summarized the changes discussed. Facilitate access to opportunity, add with access to job affordable, quality daycare. He will also incorporate childcare needs in chapter five. For impediment four, he will move strategy four to being the first listed and state it as improving fair housing enforcement and transparency, looking at ways to strengthen enforcement and improve the processes. Alter added they should also added improve the ways of outreach and education.

McKinstry asked if mobile homes were in these conversations at all. Lehmann said they would be considered on the demand side for awareness. McKinstry noted that renters or owners of mobile homes do not have the same rights as other tenant/landlord situations. Lehmann stated the tenants, homebuyers, people looking for loans, but stated he would add mobile home renters and owners specifically to that statement as well.

Fixmer-Oraiz moved to recommends City Council approval of the 2019 Fair Housing Choice Study (Analysis of Impediments to Fair Housing Choice) with amendments as discussed during the meeting. Alter seconded the motion. A vote was taken and it passed 8-0.

DISCUSS MODIFICATIONS TO THE AID TO AGENCIES PROCESS:

Fixmer-Oraiz sent a survey to partner agencies and received eight responses and an email from Becci Reodus (Crisis/Community Center) indicating the Legacy Aid to Agencies are meeting to discuss the survey and process and asked if the Commission would wait to consider the survey responses or make any changes until they hear back from the larger group. Fixmer-Oraiz responded she felt strongly the Commission would agree. Fixmer-Oraiz noted overall responses received thus far are positive, there has been questions on why revamp the system and also to stop using the low, medium, high priority system if it isn't going to be used. Agencies also stated they felt it was required they attend every meeting and the uncomfortableness of being present when the Commission in deciding allocations.

Lehmann said the meetings must be open to the public – but the agencies don't have to be present. Fixmer-Oraiz said that needs to be made clearer to the agencies somehow.

Fixmer-Oraiz continued that Eastham raised the question at a previous meeting if HCDC is the proper body to make these allocation recommendations to Council and the current response from the survey is yes, HCDC is the appropriate body.

Padron feels the legacy agencies should be given an allocation every year from the City with a percentage increase every year so they can know and plan accordingly. HCDC could then take care of the newer agencies, etc. Some legacy agencies are planning salaries with these allocations so they need to know the funding will be there.

Fixmer-Oraiz said one response was "I believe HCDC is on the right track, but do believe there are far too many COIs (conflicts of interest) throughout the commission members to be 100%".

Crissy Canganelli (Shelter House) noted the group that is meeting is looking forward to having a more collaborative process and they recognize this commission has heavy lifting to do and goes about it with integrity and compassion. The questions the agencies want to address is how to start the process earlier to get questions answered and to look at it from a need and gaps analysis, impact versus just based on what is available.

Eastham feels it is important to ask the agencies what amount they feel is necessary for Aid to Agency budgeting and how to come to an amount on an annual basis. Eastham believes Padron's suggestion of continuous, reliable funding for some group of agencies is good. Fixmer-Oraiz noted they are trying to move that direction with the two-year funding cycles.

STAFF/COMMISSION COMMENT:

Lehmann stated July 18 is the next meeting, agenda items will be welcoming new members, the Aid to Agencies process recommendations, review of the tax exemption policy, and the South District Partnership Program. Let Lehmann know if there are other agenda items needed.

The two new members are Matt Drabek and Lyn Dee Hook Kealey. Vaughan and Harms are leaving the Commission, Lehmann shared certificates of appreciation with them.

Lehmann also provided the tentative FY20 calendar.

Two commissioners noted they could not attend on July 18. The Commission agreed it could be moved forward to July 11. Lehmann stated he will contact the new commissioners to let them know.

ADJOURNMENT:

Vaughan moved to adjourn. Harms seconded the motion. A vote was taken and the motion passed 8-0

**Housing and Community
 Development Commission
 Attendance Record**

Name	Terms Exp.	7/10	9/20	10/11	11/15	12/20	1/17	2/21	3/14	4/18	4/24	5/16	6/20
Alter, Megan	6/30/21	X	X	X	X	X	X	X	X	O/E	X	O/E	X
Brouse, Mitch	6/30/21	X	X	X	X	X	X	X	O/E	X	X	X	▪
Eastham, Charlie	6/30/20	X	X	X	X	X	X	X	X	X	X	X	X
Fixmer-Oraiz, Vanessa	6/30/20	X	O/E	X	X	X	O/E	X	X	O/E	X	X	X
Harms, Christine	6/30/19	X	X	X	X	X	X	X	X	X	X	X	X
Lamkins, Bob	6/30/19	O/E	O/E	X	O/E	O/E	▪	▪	▪	▪	▪	▪	▪
McKinstry, John	6/30/20	X	X	X	X	X	X	X	X	O/E	X	X	X
Nkumu, Peter	6/30/22	▪	▪	▪	▪	▪	▪	▪	▪	X	X	X	X
Padron, Maria	6/30/20	X	X	O/E	O/E	X	X	X	X	O/E	X	X	X
Vaughan, Paula	6/30/19	X	X	X	X	X	X	X	X	X	X	O/E	X

- Resigned from Commission

Key:

X = Present
 O = Absent
 O/E = Absent/Excused
 --- = Vacant

MINUTES

PRELIMINARY

**HOUSING AND COMMUNITY DEVELOPMENT COMMISSION
MARCH 14, 2019 – 6:30 PM
SENIOR CENTER, ROOM 202**

MEMBERS PRESENT: Megan Alter, Charlie Eastham, Vanessa Fixmer-Oraiz, Christine Harms, John McKinstry, Maria Padron and Paula Vaughan

MEMBERS ABSENT: [vacant position], Mitch Brouse

STAFF PRESENT: Kirk Lehmann, Erika Kubly

OTHERS PRESENT: Ryan Holst, Elias Ortiz, Craig Moser, Jake Kundert, Shirley Tramble, Brenda Nogaj, Kari Wilken, Roger Lusala, Roger Goedken, Brianna Wills, Heath Brewer, Ashley Gillette, Anthony Smith, Sara Barron, Michi Lopez, Martha Norbeck

RECOMMENDATIONS TO CITY COUNCIL:

By a vote of 5-0 (Eastham and Fixmer-Oraiz recused) the Commission recommends to City Council the following allocation of FY20 Emerging Aid to Agencies funds: \$9,000 to Grow Johnson County, \$5,000 to the Center for Worker Justice, and \$5,000 to Successful Living.

By a vote of 7-0 the Commission recommends to City Council the following allocation of FY20 CDBG/HOME funds:

	CDBG	HOME
Mayor’s Youth Empowerment Program - Lot Acquisition/Rental Construction		\$176,000
Iowa Valley Habitat for Humanity - Lot Acquisition/Homebuyer Assistance		\$50,000
Successful Living - Rental Acquisition		\$164,000
The Housing Fellowship - Rental Rehabilitation		\$70,000
Successful Living - Rental Rehab		\$59,000
The Housing Fellowship - CHDO Operating		\$21,000
Domestic Violence Intervention Program - Shelter Repair	\$90,000	
Old Brick – ADA/Structural Fortification Improvements	\$10,000	

In the event federal funds are higher or lower than budgeted by 20% or less, these amounts will be prorated accordingly, subject to federal caps/requirements and requested amounts; in the event federal funds are higher or lower than budgeted by more than 20%, another funding round will begin.

CALL MEETING TO ORDER:

Vaughan called the meeting to order at 6:30 PM.

APPROVAL OF THE FEBRUARY 21, 2019 MINUTES:

Eastham moved to approve the minutes of February 21, 2019 with corrections. Alter seconded. A vote was taken and the motion passed 7-0.

PUBLIC COMMENT FOR TOPICS NOT ON THE AGENDA:

None.

RECOMMENDATION TO CITY COUNCIL FOR FY2020 EMERGING AID TO AGENCIES APPLICATIONS:

Eastham excused himself from this agenda item as he is on the Board of one of the applicants. Fixmer-Oraiz also recused herself as she is employed by one of the applicants.

Lehmann presented the Commission with a summary of the six applications and the requested funding amounts and discussed clarifications about the Forest View Mobile Home Park application. The applicant, Center for Worker Justice, is not able to be present at this evening's meeting but Lehmann can try to answer any questions regarding the application.

Padron began by stating she recommended \$9,500 for Unlimited Abilities and \$9,500 for Grow Johnson County.

Vaughan recommended \$7,000 for Grow Johnson County.

Harms recommended \$5,000 for Grow Johnson County.

McKinstry recommended \$5,000 for Grow Johnson County and \$5,000 for Successful Living and \$9,000 for the mobile home park redevelopment.

Alter recommended \$3,800 to all the applicants except for Little Creations Academy. Padron noted the minimum allocation should be \$5,000 so Alter reconfigured her allocations to \$5,000 for Center for Worker Justice, \$5,000 for Johnson Clean Energy and \$5,000 for Successful Living.

Lehmann added all recommendations into a spreadsheet and calculated the averages.

McKinstry noted there is the most consensus for Grow Johnson County so that allocation should be at least the minimum of \$5,000. Given the total amount of funds the Commission has to allocate to emerging agencies, they can only fund at most two other organizations.

Padron noted the next two top vote getters were Successful Living and Center for Worker Justice (Forest View). If both those were awarded \$5,000, the total allocated would be \$15,000 which leaves \$4,000.

Padron asked why McKinstry and Alter wanted to fund the mobile home association. McKinstry noted that Forest View has a tremendous potential for affordable housing in the future. Lehmann clarified the request was not for people to attend the meetings but rather Center for Worker Justice costs which included helping the tenant association start by providing space for them to meet, occasional transportation, some translation for public meetings and childcare. The applicant stated that the most important of these functions is for meeting space rent so this association can meet. McKinstry noted this

is a true startup, it is an emerging organization. Vaughan said her concern was that the organization seemed temporary, project based, and not an emerging agency. Padron noted they are funding the Center for Worker Justice which is an agency, for their project of helping this neighborhood association. However the Center for Worker Justice has been around for more than two years and has received funding from the City so wouldn't they be excluded from this. Lehmann clarified the Center for Worker Justice has not received Aid to Agencies funds which makes them eligible for this funding. Alter supports this application because the Center for Worker Justice is lending aid to a group in community outreach and is helping a neighborhood association.

Vaughan questioned the allocation to Successful Living which appeared to be an allocation to pay employees but that would not be an ongoing payment, it would only be for one year. Her concern is if they are having difficulty paying their employees then perhaps the model for their organization should be reviewed. Harms agreed and noted all the agencies are having difficulty with payments from Medicaid and not getting paid as much as they thought and this may start a trend of all agencies coming forward. The change in Medicaid payment was known to the agencies and some likely prepared for it better than others. Alter feels this application was a creative attempt at a solution to the problem at least for the year and was thinking of the people who are impacted by the care from Successful Living but acknowledges Harms' point that this is not a permanent solution.

Padron noted these funds are for emerging agencies and Successful Living has been around for 20 years and some of the other applicants, like the energy project (Johnson Clean Energy), is very new and interesting. Vaughan noted she would like to see more details on what Johnson Clean Energy will be using the funding for and be able to target their ideas, they appear to have a lot of goals, which are all great, but it is a lot to accomplish and they need to be more focused.

Padron suggested allocating \$5,000 to Successful Living and \$5,000 to Center for Worker Justice and the remaining \$9,000 to Grow Johnson County. Grow Johnson County has never been funded before and is helping many people. Harms noted Grow Johnson County had come before the Commission before but set aside their funding request when hearing another agencies needs and acknowledging that agency needed the funding more.

Harms moved to recommend to City Council the following allocation of FY20 Emerging Aid to Agencies funds: \$9,000 to Grow Johnson County, \$5,000 to the Center for Worker Justice, and \$5,000 to Successful Living. Alter seconded the motion, a vote was taken and motion passed 5-0 (Eastham and Fixmer-Oraiz recused).

RECOMMENDATION TO CITY COUNCIL FOR FY2020 COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) AND HOME INVESTMENTS PARTNERSHIP PROGRAM (HOME) APPLICATIONS:

Lehmann shared a handout with the Commission that had the CDBG/HOME allocations ordered by average score, projects with more than \$50,000 should get first consideration and per the City's Consolidated Plan they can only fund two public facilities projects. Additionally, there are staff comments, one is Successful Living has unspent funds from the past fiscal year and if additional funds are allocated they may have difficulty meeting their commitment deadlines, therefore staff recommends not funding Successful Living until they spend down the current funding. Also for new organizations without a lot of history, staff recommends starting with small funding amounts as there may be concerns with compliance and the five year reversion of assets requirement. If a new organization does not last for five years, then the City has to pay back those funds to the federal government and if the organization doesn't own their facility they must be able to lease it for the five year compliance period. Lehmann said this may affect the applications from Little Creation Academy and Old Brick. City Staff will monitor all CDBG/HOME funded projects and work with agency staff to make sure they meet compliance.

Eastham asked about the Successful Living application and how much were they allocated and have left unspent. Lehmann said they have approximately \$30,000 from the FY18 rehab allocation unspent, for the FY19 acquisition they have spent around \$60,000 and will spend approximately \$75,000 shortly which

leaves approximately \$60,000 in additional funds they have not spent. The rehab project is the one they have had more delays on, not as much with acquisition projects. Lehmann noted this is a concern staff wanted the Commission to be aware of as they award funds, the Commission can still allocate funds as they see best and staff will work with those agencies to make sure there are no issues moving forward. Eastham noted that the new Successful Living rehab project could get funded and move forward even though the current rehab project is having issues.

Roger Goedken (Successful Living) stated with regards to the FY18 rehab project they anticipate the work being done in April, weather has been some of the hold-up. With the home acquisition funds they have purchased one home and have residents moving in, the other they just closed on and they anticipate to spend those remaining funds by the end of the fiscal year as they are actively looking at houses. He explained there were many issues with the rehab project including when federal agencies shut down, rental moratorium, and issues with finding contractors. He added that even when they have acquisition projects they sometimes have to do limited rehab to those houses to make them accessible for their clients. Lehmann stated there were also some delays with the FY18 acquisition but staff had amended the Annual Action Plan for it and it was completed a couple months back. Goedken said the current application is for a kitchen/bathroom remodel and new HVAC on a house they purchased a few years ago, they do have residents currently living there but the repairs are needed.

Lehmann stated regarding the HUD guidance for the boiler issue for Little Creations Academy, HUD requested additional clarification and Lehmann supplied it but has yet to hear back.

Vaughan began with the public facilities projects (CDBG) and noted they can fund no more than two projects. Lehmann noted they have \$100,000 to allocate and also that CDBG funds can be used for housing projects but HOME funds cannot be used for public facility projects. Vaughan stated when looking at the commissioner's allocations it appears everyone was in favor of funding Domestic Violence Intervention Program - Shelter Repair and additionally the Old Brick – ADA/Structural Fortification Improvements. Alter proposed allocating \$90,000 to DVIP and \$10,000 for Old Brick.

Eastham noted the DVIP application is strong in terms of the need to repair the shelter as well as the need to repair the parking lot however he feels financing the repair to the parking lot could be done in another way and the Commission's priority should be on the repairs to the shelter interior. He noted Council has the ability to provide additional funds to these organizations and the Council should pay for the parking lot repair. Alter agrees however noted that Council just funded a larger allocation in the Aid to Agencies based on Commission recommendation and may point to the fact the Commission indeed has funds to support this application in this case. McKinstry noted with the recent consolidation, DVIP now has to cover a larger geographic area and that is stretching their already dwindling funds. If they had the money to do these repairs, such as the parking lot, they would have done it – they do not have additional funding to support this repair. Padron agreed with McKinstry and noted that what Eastham stated about DVIP is how she feels about Old Brick, perhaps Old Brick could find funding elsewhere. Fixmer-Oraiz agreed with Alter and noted if we send any of these applications to Council they may not fund anything. She also agrees with Padron that Old Brick could have more avenues for funding. Harms feels the Commission should support Old Brick and noted it is always hard for the Commission because there are applications for historical preservation and others for necessary community services. For that reason she feels comfortable with the allocation of \$90,000 to DVIP and \$10,000 to Old Brick.

Vaughan noted the Commission is to only review what is in the application before them, they are not here to make recommendations on how other agencies might run their business, they are to look at the applications and make recommendations based on the information in those applications.

Eastham noted he is fine with the allocation of \$90,000 to DVIP and \$10,000 to Old Brick but will keep advocating for City Council to step up and help agencies, we should not solely rely on federal funding.

Lehmann noted that Old Brick is also applying for local and state historic preservation grants as well.

Vaughan next moved to housing applications, there are \$540,000 in HOME funds to allocate. Looking at the Commission's individual allocations it appears if they went with the averages for application they

would be slightly under their allocated amount.

Eastham noted he is uneasy allocating money to Habitat for new homes when there are other agencies such as Successful Living and MYEP who have clients living in homes in need of repair. Padron agrees.

Lehmann noted The Housing Fellowship - Rental Rehabilitation would need to be allocated \$70,000 based on the estimated funding required for CHDO reserve funds.

Eastham stated Successful Living and MYEP had a clear plan and need for adding to their group homes, they both have waiting lists, both run stellar group home programming for the residents, the rehab amounts seemed reasonable. Eastham added he would be fine not allocating any CHDO operating funds to The Housing Fellowship, he feels that organization would be fine without those funds and would prefer giving MYEP and Successful Living amounts closer to what they applied for.

Vaughan noted her concern with Successful Living having challenges meeting timeframes and payroll (since they requested paying employees from the emerging agencies grant). She is also concerned about the future of Medicaid funding from the State and feels more local aid will be needed for these agencies.

McKinstry agrees with Eastham on the issue of need for affordable rental versus affordable ownership and noted he did not allocate as much to Habitat for Humanity because the money could help more individuals in rentals rather than ownership. He also values the need for affordable homeownership and it addresses historic imbalances and therefore would want to see some homeownership in the mix which should be supported by some public funds as well as private funds.

Fixmer-Oraiz was swayed by the presentation Habitat gave at the last meeting and learned about the overall impact homeownership has on the community. She allocated the full amount but equally can see the need for assisted living as well and will support those as well.

Alter noted that Habitat said they could purchase a lot and get started on a new home with a \$50,000 allocation so that is what she feels they should be awarded. That will open up more monies for Successful Living or MYEP. She does strongly support funding Habitat for the reasons McKinstry noted.

Eastham asked if there was any support from other commissioners to reduce The Housing Fund allocation and therefore not fund their CHDO operating request. He stated he has seen their budget and feels this amount requested is not a make or break amount in their overall budget. Those funds from the CHDO operating request could better be served in Successful Living and MYEP to expand the number of residents they could serve.

Fixmer-Oraiz did not agree and felt CHDO operating funds should be funded. Padron agreed and also feels the Habitat allocation should be lowered to \$50,000 and any additional funds be split amongst Successful Living and MYEP.

The Commission discussed the reallocations and staff presented a new allocation table for the Commission to vote on. They also discussed what to do in the event the federal funding was different than what they based the allocations on. Lehmann said in the past, staff has prorated the allocations among the agencies unless it was more or less than a 20% difference. Eastham suggested no positive prorated amounts be added to The Housing Fellowship. Vaughan noted they could add if prorated up but to make sure the allocation is not more than the asking amount.

McKinstry moved to recommend to City Council the following allocation of FY20 CDBG/HOME funds:

	CDBG	HOME
Mayor's Youth Empowerment Program - Lot Acquisition/Rental Construction		\$176,000

Iowa Valley Habitat for Humanity - Lot Acquisition/Homebuyer Assistance		\$50,000
Successful Living - Rental Acquisition		\$164,000
The Housing Fellowship - Rental Rehabilitation		\$70,000
Successful Living - Rental Rehab		\$59,000
The Housing Fellowship - CHDO Operating		\$21,000
Domestic Violence Intervention Program - Shelter Repair	\$90,000	
Old Brick – ADA/Structural Fortification Improvements	\$10,000	

In the event federal funds are higher or lower than budgeted by 20% or less, these amounts will be prorated accordingly, subject to federal caps/requirements and requested amounts; in the event federal funds are higher or lower than budgeted by more than 20%, another funding round will begin. Fixmer-Oraiz seconded. Passed 7-0

PRESENTATION ON FAIR HOUSING STUDY:

Lehmann presented the Fair Housing Choice Study staff began working on some time ago, beginning with introduction, public input received and initial observations.

Fair Housing Choice is the ability to choose housing free from unlawful discrimination, it applies to owners and renters, and to people providing other housing services as well such as financing. There are many protected classes based on Iowa City’s Human Rights Ordinance including age, disability, color, class, race, nation of origin, creed or religion, sex, gender or identity or sex orientation, marital/familial status, presence or absence of dependents and most recently added public assistance as a source of income including Housing Choice Vouchers. The City strives to further fair housing in everything it does, it is a requirement of HUD funds but also applies to all the City’s programs. This means the City tries to take meaningful actions to overcome patterns of segregation, promote fair housing choice and ultimately to foster inclusive communities. Lehmann pointed out that fair housing is different than affordable housing although there is a lot of overlap because often affordability is a barrier to housing choice. However, fair housing is the idea that housing is available to all residents of the community whereas affordable housing is housing costs that match incomes. Often protected classes have lower incomes so providing affordable housing is important to fair housing but it is not sufficient to affirmatively further fair housing.

The Fair Housing Choice study is being conducted by Neighborhood Services and the Office of Equity and Human Rights. It includes both qualitative (getting narrative) and quantitative (looking at data) components. In terms of public input so far (qualitative) City staff held a public meeting and six focus groups of different representative groups (a total of 83 attendees), and then also did a public survey for broader public perspectives, which got 234 responses. For the quantitative analysis they looked at private and public data, most of which is from the census. The goal is to complete the study in May 2019 so it is ready for review when the Consolidated Plan is updated. Staff will share a copy of the study draft with Commissioners in May.

For the survey, 234 individuals responded, skewing towards higher incomes. The survey was made available online and hard copies were provided through the public library and social service agencies. They received good feedback in terms of getting representation of protected classes. 70% of respondents were females, 17% were nonwhite or Hispanic, 5% were foreign-born, 20% had a disability, 12% spoke another language, 12% had a Housing Choice Voucher. One big thing that stuck out were only 43% of respondents said they felt they understood their fair housing rights while 26% felt they experienced discrimination. Somewhat shocking but not surprising, was only 3% of those filed a complaint. Most stated they didn’t know what good it would do (70% of respondents) while others were unfamiliar with

how to do it or afraid of retaliation. In terms of barriers cited, affordable housing was overwhelmingly cited as the primary barrier to fair housing choice, including all for types of households (large families, small families, persons with disabilities, etc.) and the most common source of discrimination people noted was having a Housing Choice Voucher. In terms of public policies that were identified as barriers none received a majority, but the top ones were City funding practices followed by zoning and housing codes.

At focus groups and the public meeting, the comments mirrored many results from the survey. Iowa City was noted as an expensive housing market, and incomes don't necessarily match the cost of the market and it is especially problematic where there is not a diversity of housing choices within a neighborhood (if it is all single family it can be challenging for different groups to find housing). This includes both City assisted housing and privately affordable housing because it is just not City assisted housing that is affordable. For the housing stock it was also mentioned that there are low quality rentals, especially near downtown, which can be problematic for persons who are in protected classes as well as accessibility challenges in older parts of the City with properties not built to visitability standards.

There were several public policy challenges raised, development codes can increase costs and limit flexibility, especially where design review is involved. Policies need to better align with goals and funding that is allocated should match up with the goals the City has (it doesn't always). The City should also streamline processes wherever they can including rental permitting, and the City needs to make sure they enforce their rental housing standards so there is quality housing. Coordination was also cited as an issue, between the City and surrounding jurisdictions and also with other actors (tenants, builders, landlords, etc.) or educational institutions such as the school district and university. Overall education is generally needed for tenants and landlords to better understand what fair housing rights are, what the responsibilities of different parties are in the housing market and to better inform people on neighborhoods (people can be informally or formally steered towards certain neighborhoods) and the survey corroborated that.

In terms of data observations, Iowa City is a college town and has more young people, fewer families, and fewer children especially near downtown. Generally, near downtown there are fewer persons with disabilities because it is a younger population, it is more ethnically, racially and culturally diverse, a lot due to immigration into Iowa City especially from Asian populations, but also black/African American populations as well. There are some racial/ethnic concentrations across the City, specifically Black/Hispanic groups south of Highway 6 and Asian groups concentrated on the west side. None of these concentrations meet the standard HUD for being a racially and ethnically concentrated area of poverty however. Those areas do tend to have lower incomes but the lowest income areas tend to be nearer to the university where students are. There are large limited English proficiency populations, especially Spanish (3100 speakers) and Mandarin (2400 speakers). Segregation by race or ethnicity is considered low in Iowa City based on the dissimilarity index standards, but it has been increasing over time. For the economy, it is focused around education and healthcare, there is a high proportion of low-income households due to student populations and that is increasing as well. Minority households tend to have lower incomes in Iowa City, primarily outside downtown, and LMI (low moderate income) areas are primarily to the south and west but there is a large LMI area downtown as well.

The majority of housing in Iowa City is rental, concentrated in around downtown and near the university. Minority groups tend to have lower homeownership rates in Iowa City, which especially true for Black households and households of two or more races. There has been a large increase in multifamily building permits, peaking in 2016, much of it is downtown, and there are correspondingly higher vacancy rates with that. That being noted, rents have increased faster than incomes or housing values. Housing values have actually been closer to increases in income lately but rents increased more quickly. In terms of cost burden (which means they are paying more than 30% of their income on housing), 16% of homeowners and 64% of renters are cost burdened, a lot of whom are students based on non-familial status. Minority households tend to experience housing issues at higher rates including housing cost burden and other issues such as overcrowding and the quality of facilities.

Lehmann noted there is limited data on fair housing because things don't get reported, but of the data they do have in Iowa City there tends to be around 10-12 fair housing complaints per year. Most of those are based on discrimination by race, disability or sex. 1/3 tend to be outside the City's jurisdiction so they

get referred to the correct jurisdiction, 1/3 get closure at the City or withdrawn due to resolution and the remaining 1/3 require further various levels of investigation. Data from the State or Federal level is even more limited, most is based on Johnson County. Progress since the last plan, there were five findings and while the City was making progress some of these findings have cropped up again. For example, racial ethnic concentrations is still there, outreach and education is still an issue and a huge need.

Staff next looked at policies, public sector policies in addition to private sector policies and Lehmann discussed those and where staff found impediments. For City development codes there is no reasonable accommodation policy for persons with disabilities which is basically a streamlined approach for, say someone in a wheelchair to put a ramp outside their house in a historic district where there are many levels of complex policies to deal with. Staff is looking to adopt some sort of reasonable accommodation policy to ensure people can be housed in older parts of the City without running into bureaucratic barriers. Also staff is looking at generally increasing opportunities or choices for housing by allowing diverse housing throughout the City. That will focus on increasing density because single family can be affordable depending on construction but allowing more multifamily by right in residential areas would be good. They are also looking at bedroom caps in multifamily as that can restrict large families and student living. Finally looking at how permanent supportive housing is currently treated in the community because it is treated as separate use only allowable in specific zones (essentially the Cross Park Place project where it is long-term housing, more than a year lease). Housing Code has new requirements like rental permit cap, increased inspections, which may affect protected classes, these changes are relatively new as of 2018 so it is hard to know the impact or results but it will be tracked.

Vaughan asked if those new requirements were federal requirements. Lehmann replied it was a State requirement change where a city could not distinguish between nonfamily and family households in the zoning code which was a way the City was trying to balance student housing downtown. When the State made that change the City reviewed the process and put a cap on areas near the university and also increased inspections for certain types of units.

For affordable housing assistance, Lehmann stated the City put more local funding towards affordable housing initiatives but it doesn't have the same federal requirements, so staff has not been tracking protected characteristics for beneficiaries. As such, impacts are difficult to ascertain for all City assistance because more than half the units created aren't being tracked. With new funding comes new programs and lots of requirements and staff is making sure administrative rules are well coordinated.

For site selection and neighborhood revitalization, Lehmann stated the Affordable Housing Location Model and rental permit cap interact in complex ways; both affect certain types of housing in certain areas at certain times. Staff is working to identify those affects for affordable housing and service providers, how they impact choices for protected classes and seeing if there are ways to streamline some of these programs as they come into play. Currently there are 1215 Housing Choice Vouchers, about 850 of which are in Iowa City. Within Iowa City, Housing Choice Vouchers are still relatively concentrated in certain neighborhoods, typically the more affordable neighborhoods thus the concentration. However based on the survey there is also some evidence landlords may still be discriminating against Housing Choice Voucher recipients. Therefore providing more information to Housing Choice Voucher recipients is needed, further alerting them of their rights and encouraging them to live in other areas of the City is something staff is recommending. Also The Housing Authority has a preference categories with families, persons with disabilities, and elderly with residency in Iowa City as the first group to receive vouchers. Staff recommends an equity analysis to make sure the policy is targeting the correct populations for service as based on the CITY STEPS Consolidated Plan.

With regards to home lending, Lehmann noted the data showed Black and Hispanic households have elevated rates of denials, however a study that was conducted a year ago showed there are discrepancies in data entry and there are issues with a small sample size. Staff wants to follow up to make sure this is not discrimination and will continue to monitor. Additionally they recommend additional fair housing education for lenders and borrowers.

Alter asked if the City has anyone that works with lenders and people who are applying to help them through the process. Lehmann stated the City does trainings for lenders but is unsure of how regularly it

is done. These trainings are also provided for the general public. Kubly added if a person is part of The Housing Choice Voucher program they are assigned a case worker to help them navigate the process.

Eastham asked about impediments related to realtors. Lehmann said he had no data on it but based on the focus groups it doesn't seem to be much of an issue, it seems the larger issues for steering people to certain locations is word of mouth from others in the community. Eastham said he hears anecdotal statements about realtors engaging in steering certain people to certain locations of town. McKinstry noted when he has talked to realtors it appears everyone is super sensitive to steering and know it is illegal and unethical and are hypervigilant in not steering people to certain locations of town. He was startled to find there are four or five protected classes here in Iowa City more than in other areas of the State or Nation. He stated that two woman in Missouri, this year, were denied the opportunity to live in a retirement center because they were married to each other. Because of situations like that McKinstry is so glad Iowa City has these additional protected classes.

Lehmann noted for the rental market there is a mismatch between the cost of rentals and incomes and staff recommends more rentals in high demand areas, especially downtown, and considering ways to reduce the cost of housing such as group living options. The also recommend more education on the protections for renters and keeping landlords apprised of the protected classes and education of best practices. Additionally staff needs to make sure all fair housing complaints are dealt with in a timely manner and resolved quickly. Since there is a lack of metrics for policy impacts staff will need to make sure they measure these fair housing impacts on protected classes. Lehmann noted staff does not do a lot of testing in Iowa City but it is one of the better ways identify discrimination or steering.

Finally Lehmann talked about other observations worth noting. There are ethnical and racial concentrations so encouraging a range of housing throughout the City while continuing to invest in minority, LMI or protected class neighborhoods is important. Homeownership rates are lower for minority groups so it is important to encouraging homebuyer programs in targeted areas for protected classes. For elderly households and persons with disabilities, especially those with ambulatory issues who cannot walk around easily, there is a need to focus on areas of town with accessibility barriers to help ensure aging in place is possible. Student populations have the lowest incomes, so there is a need to ensure all, especially those who are LMI or in protected classes, can afford to live in the community.

In terms of next steps, Lehmann stated staff is working on the internal review of the draft of the Fair Housing Study, hoping to get a draft to stakeholders in April and start to let the document be public for adoption process, there will be a public meeting with HCDC on May 16 and then go before Council either May 21 or June 4 and have the document adopted prior to June 30.

Eastham stated he wanted to see the data behind this study for the HCDC review.

Harms noted that when someone has an issue, time constraints for resolving the issue is enormous, especially for working individuals. Perhaps the City could increase hours of availability to help the public.

Fixmer-Oraiz noted a recurring theme in the Study is a need for education and outreach and there definitely needs to be more for renters, landlords and potential homeowners. Eastham stated if the City is going to put resources toward this education and outreach it should be for consumers, realtors and banks already have some educational opportunities. Fixmer-Oraiz noted the university does a freshman intake and perhaps the City can provide education on fair housing. Lehmann noted the university does a "Renter 101" event and Iowa City provides information at that. Vaughan suggested something other than just a written brochure, it doesn't often speak to a lot of people, and is easily tossed. She noted it should be written to speak to all individuals, regardless of the level of education.

Padron noted it is important to remember not every resident has a computer or internet and much of what comes from the City is via email or directs one to a website. Harms noted with the elderly or others they may not want to use a computer and the City needs to be cognizant of that. Lehmann noted they did hand out hard copies of the survey in the senior living areas, agencies and also at the library for those that did not want to use a computer. The surveys were provided in multiple languages.

Vaughan asked if there was educational pieces created do they have to be done by staff or can volunteers assist. Lehmann said they would welcome volunteers and partners.

McKinstry is happy to see the interest in collecting data on housing in the City.

Fixmer-Oraiz asked if the City could partner with the school district and send information home in backpacks. Lehmann stated the school district has tightened up on allowing things to be handed out but improved coordination between the City and schools is needed.

Any additional comments or questions can be directed to Lehmann.

STAFF/COMMISSION COMMENT:

Lehmann noted that Council has appointed Peter Nkumu to the Commission, he is the president of the Congolese Community of Iowa and will be a great addition to the Commission.

Staff is interviewing consultants for the Consolidated Plan this month.

Staff, Padron and the head of the Human Rights Commission had a brief discussion on the ways to revamp the Aid to Agencies process, conversations will continue in April.

The next HCDC meeting will be April 18 where we will discuss projects not conforming to the unsuccessful delayed project policy which will include a report from The Arthur Street Healthy Living Center. They will also have HCDC monitoring reports and begin Aid to Agency visioning process and also a background information presentation on the Affordable Housing Model. Staff will present the Annual Action Plan and continue the Fair Housing Study review.

Eastham noted he heard from an agency partner some agencies are having discussions with the City Manager on Aid to Agency funds and what those agencies feel the City should be funding. Lehmann said this will be part of the discussion at the next meeting.

Lehmann stated Community Development Week is April 22-26, there will be some type of proclamation and Vaughan suggested doing some type of tour of projects that are complete, to see the impact.

Lehmann noted there is a new tenant education program that the local Homeless Coordination Board is putting together, it is intended as a possible alternative to eviction for tenants. It will start April 9 in the Iowa City Public Library and be held every Tuesday through May 14 for a total of six modules.

Fixmer-Oraiz had a question on monies from other sources and specifically The United Way who gives out all kinds of money to agencies. Lehmann noted the application process does go through The United Way along with Coralville, Johnson County and United Way.

ADJOURNMENT:

Fixmer-Oraiz moved to adjourn. Alter seconded. Passed 7-0

**Housing and Community
 Development Commission
 Attendance Record**

Name	Terms Exp.	7/10	9/20	10/11	11/15	12/20	1/17	2/21	3/14			
Alter, Megan	7/1/21	X	X	X	X	X	X	X	X			
Brouse, Mitch	7/1/21	X	X	X	X	X	X	X	O/E			
Eastham, Charlie	7/1/20	X	X	X	X	X	X	X	X			
Fixmer-Oraiz, Vanessa	7/1/20	X	O/E	X	X	X	O/E	X	X			
Harms, Christine	7/1/19	X	X	X	X	X	X	X	X			
Lamkins, Bob	7/1/19	O/E	O/E	X	O/E	O/E	▪	▪	▪	▪	▪	▪
McKinstry, John	7/1/17	X	X	X	X	X	X	X	X			
Padron, Maria	7/1/20	X	X	O/E	O/E	X	X	X	X			
Vaughan, Paula	7/1/19	X	X	X	X	X	X	X	X			

- Resigned from Commission

Key:

X = Present
 O = Absent
 O/E = Absent/Excused
 --- = Vacant