

# Analysis of Impediments to Fair Housing Choice in the Western Greater Yellowstone Area

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Draft

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## EXECUTIVE SUMMARY

### INTRODUCTION

Fremont County, Idaho was awarded a \$1.5 million Sustainable Communities Planning Grant (SCPG) from the United States Department of Housing and Urban Development (HUD) to develop a Plan for Sustainable Development of the Western Greater Yellowstone Area (WGYA). The WGYA comprises Fremont, Madison, and Teton Counties in Idaho and Teton County in Wyoming, with the major cities of Ashton, St. Anthony, Island Park, Rexburg, Driggs, and Victor. The city of Jackson Hole in Teton County, Wyoming, the county's major city, opted to not participate in the grant application and is excluded from the analysis, except where necessary to make comparisons. This report is made on behalf of the WGYA and the counties and cities within it.

The SCPG is part of HUD's Sustainable Communities Regional Planning Grant program, which encourages grantees to support multijurisdictional planning. Promoting planning efforts that integrate housing, land use, economic and workforce development, transportation, and infrastructure investments to address the interdependent challenges of:

- economic competitiveness
- social equity, inclusion, and access to opportunity
- energy use and climate change
- public health and environmental impact

Grant recipients are required to sign a certification to affirmatively further fair housing. As part of the jurisdiction's Consolidated Plan, these recipients are required to undertake fair housing planning. Fair Housing Planning consists of the following:

- (1) An Analysis of Impediments (AI) to fair housing choice
- (2) Action Plan to cover the effects of the identified impediments;
- (3) Maintenance of records to support the affirmatively furthering fair housing certification.<sup>1</sup>

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<sup>1</sup> (Volume 1). *Fair Housing Planning Guide*. Office of Fair Housing and Equal Opportunity, Fair Housing Information Clearinghouse. US Department of Housing and Urban Development.

An Analysis of Impediments (AI) to Fair Housing Choice is a review of impediments, or barriers, to fair housing choice within a state or local jurisdiction. It is required by all recipients of federal funding for Community Development Block Grants (CDBGs) or Sustainable Communities Planning Grants (SCPGs). The purpose of the AI is to enable local governments to make informed policy decisions that remove barriers to fair housing choice. A Regional AI seeks to not only assess impediments across the region under review, but to also provide an in-depth analysis of the counties and major cities within the region. In conducting the analysis, emphasis is placed on viewing the geographical area under review from a fair housing lens, with a focus on protected classes. The Federal Fair Housing Act of 1968 defines protected classes as race, color, religion, sex, disability, familial status, or national origin.<sup>1</sup>

Impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choice or the availability of housing choices
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.<sup>2</sup>

As defined by HUD, in the *Fair Housing Planning Guide*, the AI is a review of impediments to fair housing choice within the public and private sector and involves:

- A comprehensive review of a State or Entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices
- An assessment of how those laws, etc., affect the location, availability, and accessibility of housing
- An assessment of conditions, both public and private, affecting fair housing choice for all protected classes
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.

The purpose of the AI is to:

- Serve as the substantive, logical basis for FHP
- Provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates.

- Assist in building public support for fair housing efforts both within a State or Entitlement jurisdiction’s boundaries and beyond. .<sup>2</sup>

In order to identify impediments, or potential impediments, HUD recommends conducting a background analysis of the region, an analysis of racial/ethnic segregation and integration, an analysis to identify racially and ethnically concentrated areas of poverty, and an analysis to assess equity by studying disparities in access to opportunity. The background analysis is intended to provide an overarching context for the analysis that follows, and as such, it is the first step in the AI process.

Fremont County contracted with Eastern Idaho Entrepreneurial Center to complete the background research and analysis for the AI. The project is being conducted in three stages, with this being the second. The focus this term is to create an initial draft of the AI, with the exclusion of the public input section which will be addressed in the final project stage.

### IMPEDIMENTS TO FAIR HOUSING CHOICE

The Analysis of Impediments revealed the following impediments to fair housing choice in the Western Greater Yellowstone Area:

- 1.

### ACTIONS TO BE IMPLEMENTED

### METHODOLOGY

As a recipient of a Sustainable Communities Regional Planning Grant, the Western Greater Yellowstone Region (WGYA) is required to submit certification of affirmatively furthering fair housing to the U.S. Department of Housing and Urban Development. Each grantee has the obligation to conduct an AI with respect to its own jurisdiction. This obligation can be met through the preparation of a Regional AI so long as it addresses impediments to fair housing choice in each jurisdiction and across the region. The WGYA chose to complete a Regional AI to meet this obligation. The AI conducts an in depth examination

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<sup>2</sup> Housing and Urban Development . (2012). *The FHEA compared to the Regional AI.*

of housing, affirmatively furthering fair housing, the fair housing delivery system, and housing transactions.

In the *Fair Housing Planning Guide*, impediments are defined as:

“Actions, omissions, or decisions taken because of race, color, religion, disability, familial status, or national origin which restrict housing choices or the availability of housing choices. “

Any action, omissions, or decisions which has the effect of restricting housing choice or the availability of housing choices bases of race, color, religion, sex, disability, familial status, or national origin. “

A fair housing concern is a fair housing issue that may create an impediment to fair housing choice but there is not a direct causal relationship that can be established.<sup>3</sup>

An AI should “describe the degree of segregation and restricted housing by race, ethnicity, disability status, and families with children.” The AI must address how the segregation and restrictions of housing choices occurred as well as identification of disparities in access to opportunity.

Federal fair housing statues are primarily governed by the following:

- 1) Fair Housing Act
- 2) The Housing Amendments Act
- 3) The American’s with Disabilities Act

In addition to the above recognized federal fair housing acts, it is not uncommon for state regulated “Right to Farm” acts to also be included in an analysis of fair housing for rural regional areas. Specific issues that come into play are the high prevalence of ethnic groups that are employed as farm labor and the historically common practice of providing employee housing on site.<sup>4</sup> Zoning regulations that restrict the agricultural practice of providing on site housing should be evaluated for the following outcomes:

- Restricts the availability of fair housing
- Limits the availability of housing choice

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<sup>3</sup> Volume 1). *Fair Housing Planning Guide*. Office of Fair Housing and Equal Opportunity , Fair Housing Information Clearinghouse. US Department of Housing and Urban Development.

<sup>4</sup> Cumberland Couty Offices . (n.d.). *Agricultural Preservation Zoning: Tri-County Region*. Commissioners Strategic Planning, Carlisle PA. Retrieved from <http://www.ccpa.net/DocumentCenter/Home/View/365>

- Restricts access to opportunity<sup>5 6</sup>

The methodology for Fremont County Analysis of Fair Housing Impediment for the Western Greater Yellowstone Area included the following:

#### ANALYSIS OF URBAN AND RURAL AIs METHODOLOGIES

The primary object was comparing and contrasting approaches to obtaining and analyzing data for small rural communities, state regional studies, and urban/suburban AIs. To determine what methodologies were the most effective and current for rural regional reports. This analysis included study of governmental studies, agency reports, scholarly publications, and recommended planning guides.

#### SOCIO-ECONOMIC ANALYSIS

Research of governmental studies, agency reports, scholarly publications, and recommended planning guides. Employment data from the U.S. Bureau of Labor Statistics, Economic Data from the U.S Bureau of Economic Analysis was correlated with the FFEIC census data to locate concentrations of protected classes within specific census tracts. Due to the size of some geographic tracts, a traditional analysis (often used at a state level or in urban areas) would not have provided useful information. Information considered too private in nature has been intentionally left out of this report to comply with national privacy regulations.

#### HOUSING PROFILE

A housing profile was completed that includes the following information at a county level: units available, unit types, occupancy status, and occupancy use. Data was obtained from the FFEIC Census Data Base.

#### COST BURDEN ANALYSIS

Two cost analyses were completed: a traditional analysis utilizing the FFEIC census Data, and a secondary transportation analysis. Although exact transportation costs were not estimated commuter data was analyzed from the

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<sup>5</sup> Rudel, T., O'Neil, K., McDermott, M., & Gottlieb, P. D. (2011 Joint Conference ). *Is Agricultural Zoning Exclusionary*. Rutgers University, Agriculture & Applied Economics Association: Pennsylvania. Pittsburg Pennsylvania: Northeastern Agricultural and Resource Economics Association.

<sup>6</sup> Services, N. H. (Updated Sept. 2010 ). *Innovation Land Use Techniques: Handbook for Sustainable Development*. State of New Hampshire .

US and Idaho Department of Transportation offices, FFEIC Census Data, and private research.

#### HOUSING DISCRIMINATION: COMPLAINT DATA, LEGAL CASE ANALYSIS, AND ADVERTISEMENT EVALUATION.

The Idaho AI indicated in a map overlay that Madison County had 3 documented legal cases or complaints on file. No additional information was provided. This study was only able to locate one legal case in Madison County. Housing advertisements in the community's local papers, a regional paper, and online media sources were evaluated for verbiage that would violate fair housing regulations.

#### ZONING REGULATIONS AND LAND USE REVIEW

Each county comprehensive plan (including ordinances) was analyzed for inclusion of best fair housing practices and common impediments for rural communities. Consideration was given to county impediments that were identified in the State of Idaho AI. Potential access to opportunity issues were evaluated based upon the results of the previous AI findings for other sections.

#### PUBLIC INTERVIEWS

Interviews were conducted with the general public to gain insight into community opinions and concerns. Questions focused mainly on whether any acts of discrimination occurred in the last five years. If discrimination did occur further questions were asked to determine what form of discrimination took place and who discriminated against them.

The number of interviews was determined through calculations using a 95% confidence interval and population size. This determined a sample size of 100 of respondents was needed between the four counties for the research to be statistically significant. Interview participants were solicited by phone, mainly through the Century Link phone book (the primary phone line provider in the area). From this source, individuals were targeted through a system of random number generators to provide an unbiased sample.

Respondent data was collected and analyzed through Qualtrics. Qualtrics is online software used to create surveys and collect the data. Even more importantly, it can be used to generate reports and conduct cross tabulations that enable one more fully analyze data.

#### STAKEHOLDER INTERVIEWS

Stakeholder interviews were also conducted to gain additional insight into community practices and culture. Stakeholder contact information was

generally accessible through various chamber of commerce websites throughout the area. Recorder’s at each county office also provided referrals for prominent stakeholders in the area.

Put simply, a stakeholder is any individual or entity who participates in or is affected by fair housing regulations. To ensure the research included a variety of prominent stakeholders, other AI surveys were studied in compiling target industries. Twenty two industries were represented within the research. These include:

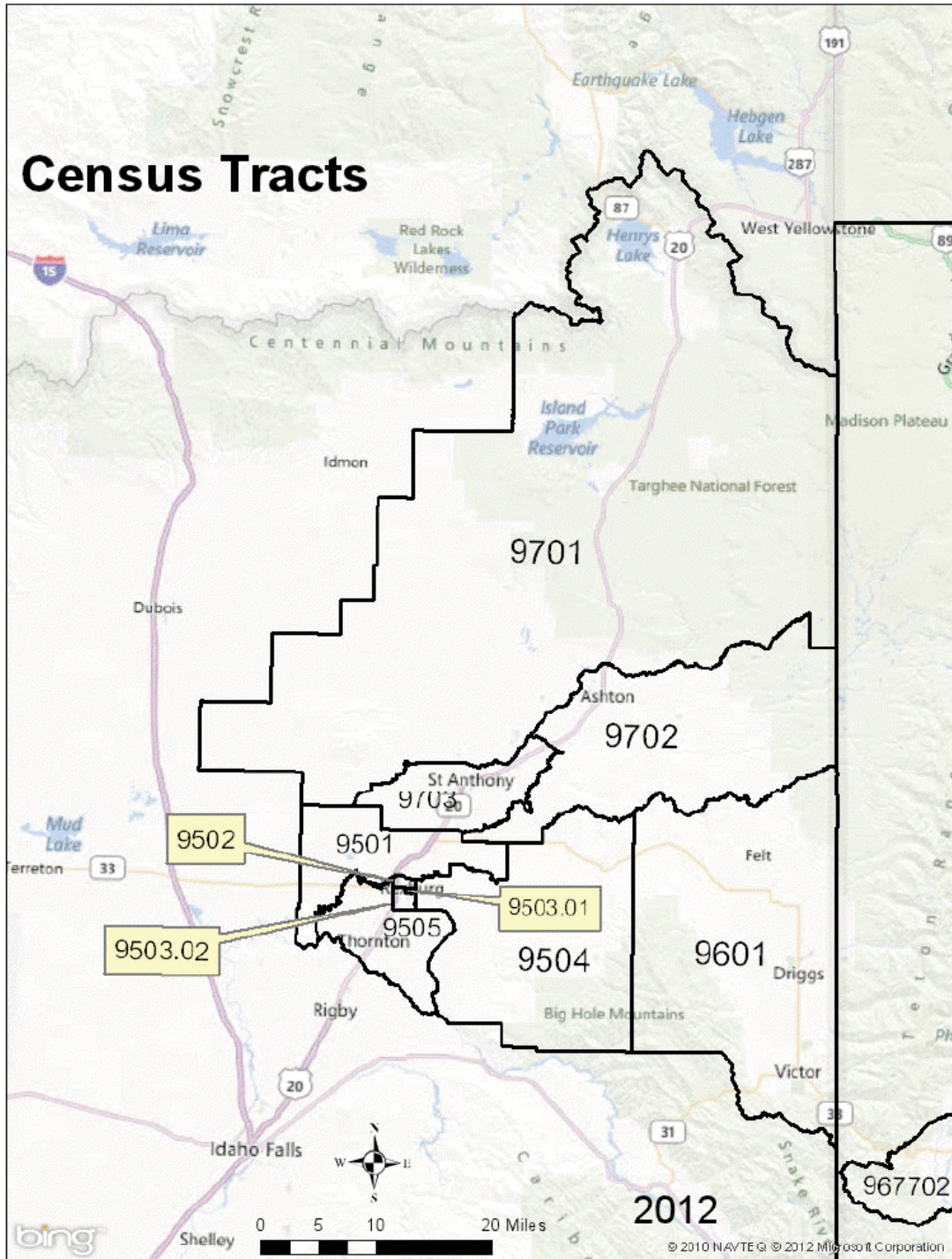
Affordable Housing Advocacy	Fair Housing
Affordable Housing Development	Food Pantry
Own Rental Property	Services for low income residents
Affordable Housing Provision	Government
Property Management	Services for persons with disabilities
Business Owner / Manager	Homeownership Counseling or Services
Public Housing Authority	Insurance
Regional Planning	Land use Planning
Residential Appraisals	Services for Seniors
Education	Landlord / Tenant Services
Sales	Services for Veterans

The survey was designed to gain input on fair housing education, potential / current impediments, and fair housing needs of the community. These interviews were primarily conducted over the phone and by email. In order to further gathered information, their responses were also recorded through Qualtrics, which provides several forms of analytical reports.

## SOCIO-ECONOMIC ANALYSIS

Included in this section is the demographic, economic, and housing data collected on the WGYA and individual jurisdictions. This data was used to analyze the social economic elements of the communities that include: population, race, ethnicity, disability, employment, poverty concentrations, and housing for trends and patterns. Additional factors that have influenced the current housing market behavior and housing choices are also included in this section.

## The Western Greater Yellowstone Area



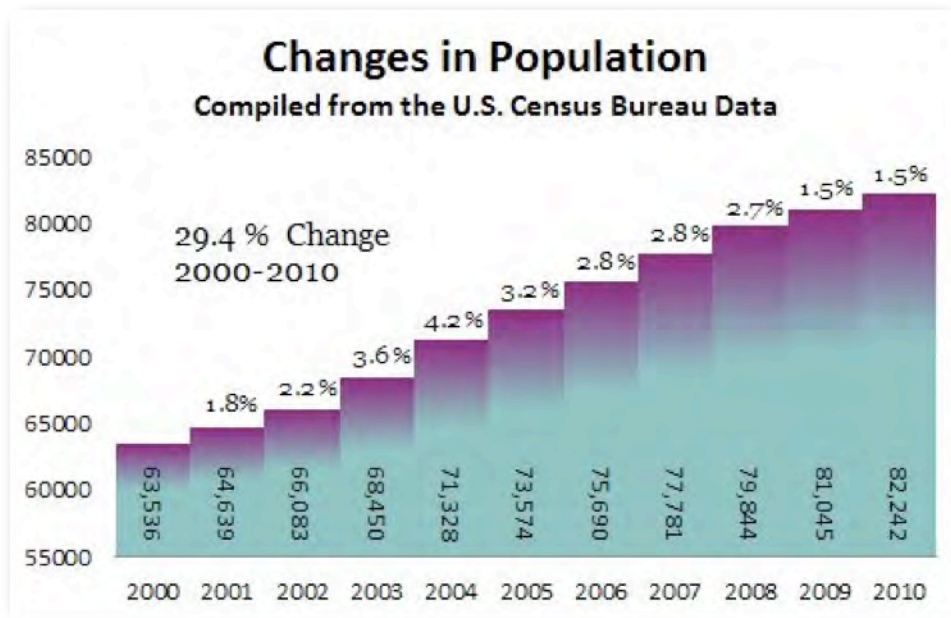
The WGYA is situated in Northeastern Idaho and Western Wyoming and is part of the largest intact ecosystem in the lower 48 states. The region encompasses Fremont, Madison, and Teton Counties in Idaho and Teton County in Wyoming. The major cities within each county were also reviewed, and include St. Anthony,

Ashton, and Island Park in Fremont County, Rexburg in Madison County, and Driggs and Victor in Teton County, Idaho. The city of Jackson, in Teton County, Wyoming opted out of participating in the grant application and, therefore, was not formally reviewed.

The small towns located in the geographic region that are not participating members of the consortium were not formally reviewed. However, they were included in the jurisdictional and regional AI analysis.

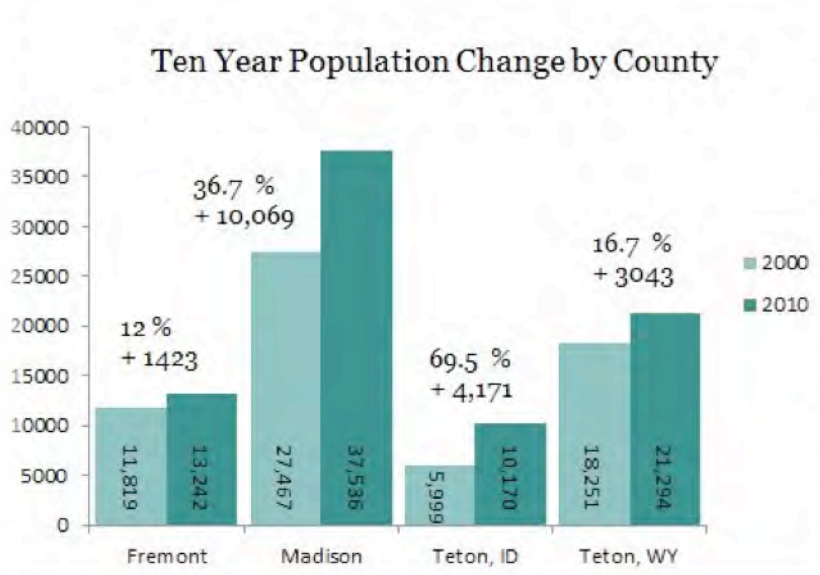
### TOTAL POPULATION

The total population for the WGYA region in 2000 was 63,536 and increased to 82,242 in 2010. These numbers reflect a net increase of 29.4%, or 18,706 residents.



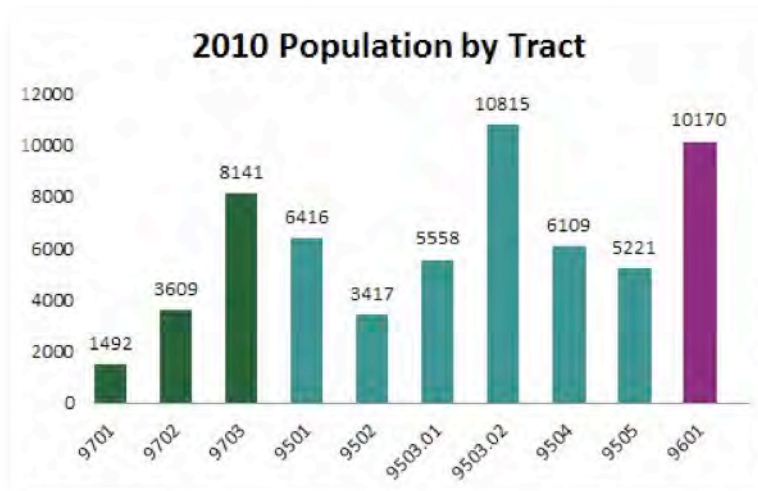
Teton County, Idaho experienced the highest growth (69.5%) for the counties under study, with Madison County second (36.7%), Teton County, Wyoming third (16.7%), and Fremont County fourth (12%).<sup>7</sup>

<sup>7</sup> US Census Bureau. (2010). *2010 Census Data Summary File 1 & 2*.



Madison County added the most residents over the decade, with an additional 10,069 residents. Teton County, ID added 4,171 residents, Teton County, WY 3,043 residents, and Fremont County showed the least in additional residents at an increase of 1,423. Madison County makes up the largest portion of the total population for the region at 45.6%. Both Fremont County and Teton County, Wyoming decreased in proportion to the total population. <sup>8</sup>

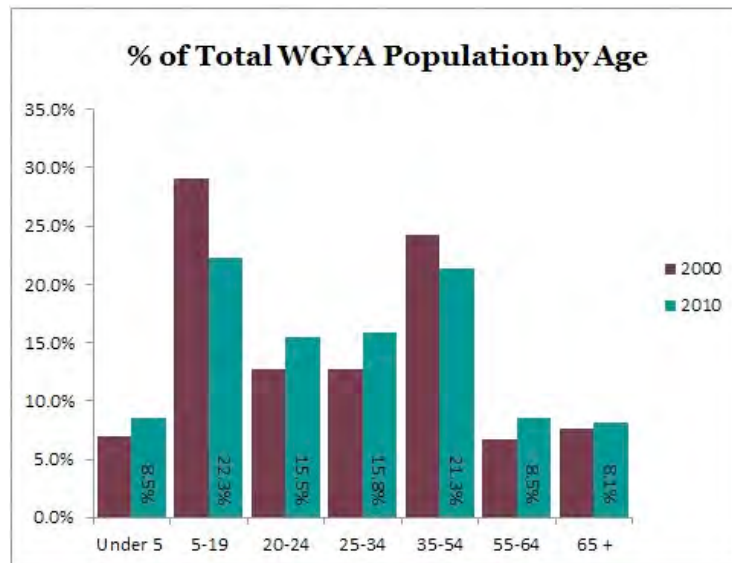
The following figures represent the 2010 population at the tract level.



#### TOTAL POPULATION BY AGE

<sup>8</sup> US Census Bureau. (2010). *2010 Census Data Summary File 1 & 2*.

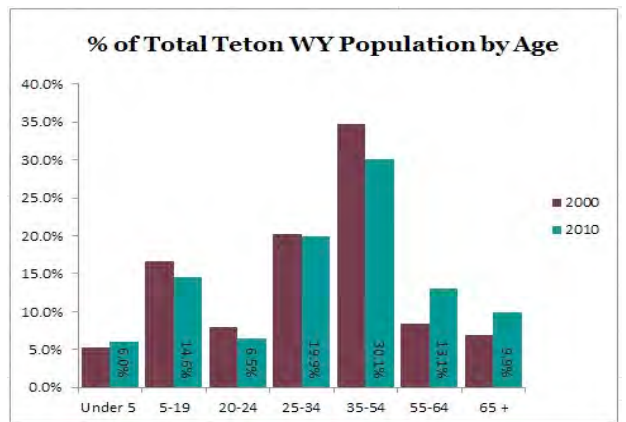
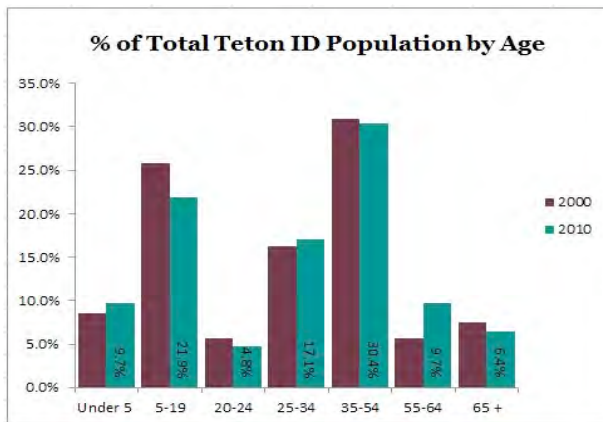
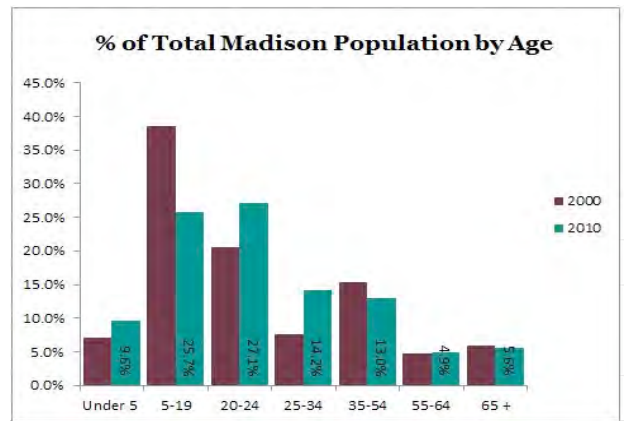
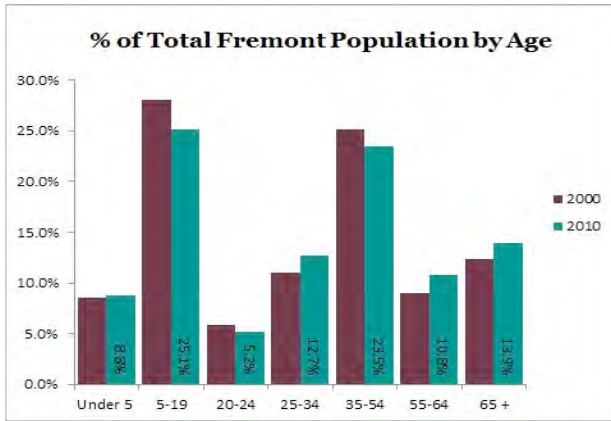
The age of the total population noted a slight decline in proportion of children ages 5 to 19, and adults ages 35 to 54 in relation to other age categories.



(US Census Bureau, 2010)

A comparison of county populations by age reveals the following similarities and differences:

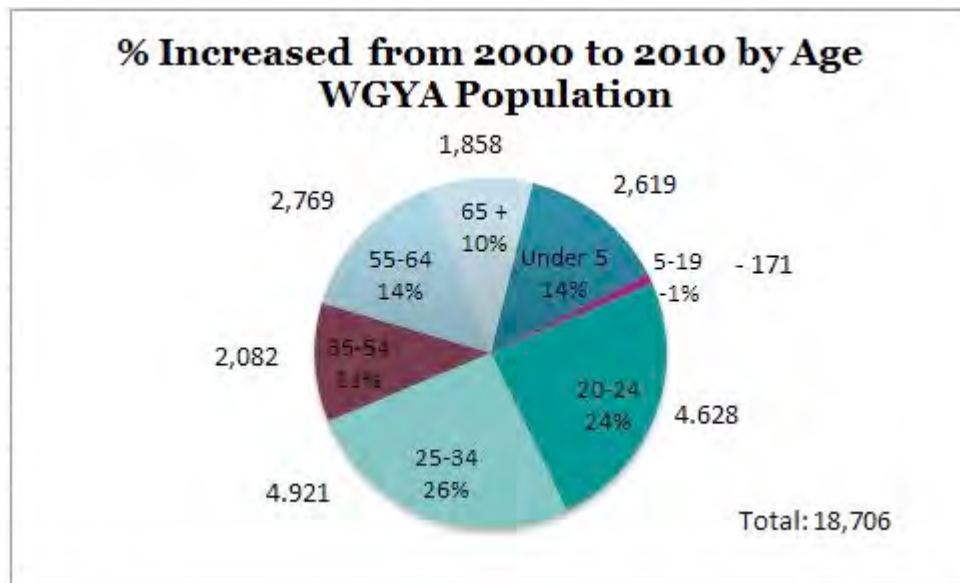
- Fremont; Madison; and Teton, WY each have a high percentage of school age children ages 5-19 in proportion to their total populations.
- Fremont; Teton, ID; and Teton, WY each have a high ratio of adults ages 35-54 in comparison to their total population.
- Madison county is unique from the other three counties due to its predominately young population with over 60% younger than 24.
- Madison also experienced the largest ratio decline in the 5-19 year old age group.



(US Census Bureau, 2010)

**TOTAL POPULATION BY AGE: PROPORTION PERCENTAGE OF GROWTH**

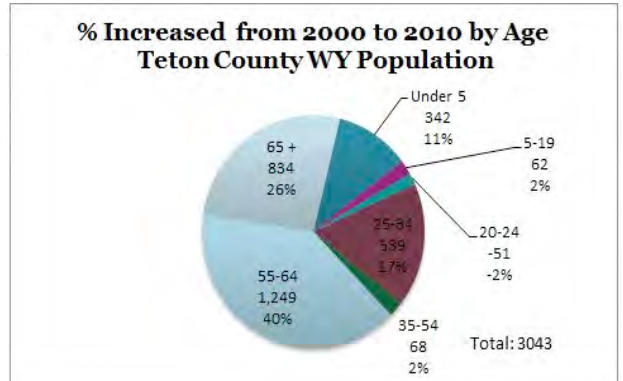
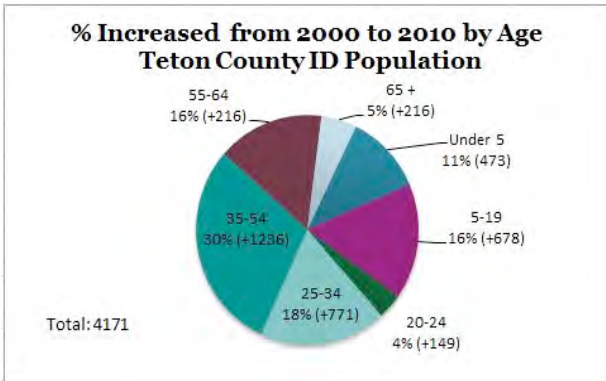
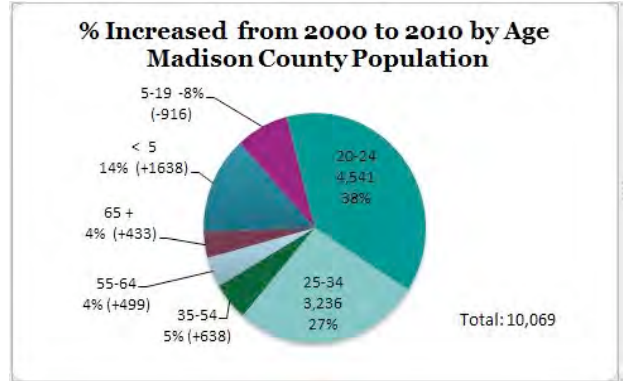
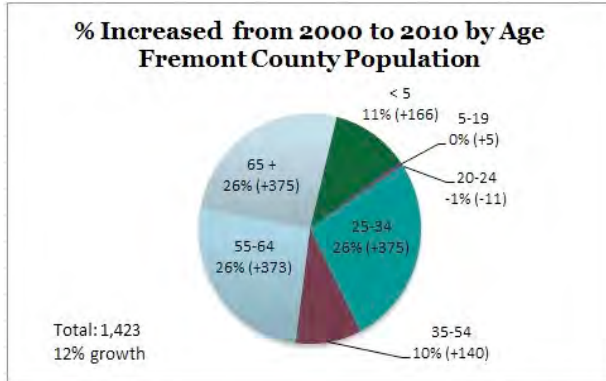
The ages of 20-34 accounted for 50% of the total growth in the WGYA region, and ages 55+ accounting for 24% of the remaining growth. There was a slight decline in school age children between the ages of 5 and 19.



(US Census Bureau, 2010)

A comparison of the percentage of growth by age among the counties highlights the following differences and similarities:

- Fremont County and Teton County WY both experience the largest growth in the ages over 55. (50-65%)
- Fremont and Madison had just over 25% of their growth obtained from the 25-34 age bracket.
- Madison County is the only county to have a major increase in the 20-24 age groups. When combined with the 25-35 age group, 65% of growth in Madison county is from the ages of 20-34.
- Teton County ID gained 48% of the population growth from the ages of 25 to 54.
- Teton County ID was the only county to have a significant percentage of growth made up of school age children between the ages of 5 and 19.
- All four counties experienced growth for children under the age of 5 at between 10 and 14%



(US Census Bureau, 2010)

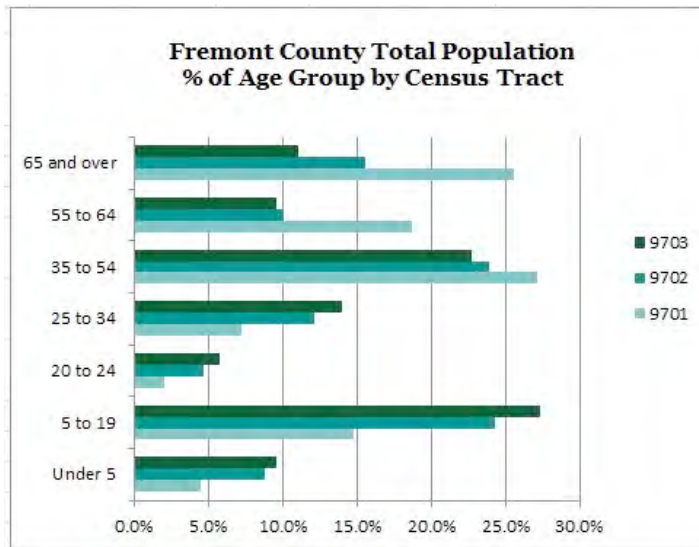
#### TOTAL POPULATION BY AGE: TRACT ANALYSIS

Fremont County tract 9701 which includes Warm River and Island Park has the following characteristics:

- Dominate percentage of adults age 35+
- Significantly higher proportion of age 55+
- The least representation from the age groups 34 and younger.

Fremont County Tract 9703, which includes St. Anthony, has the highest percentage of pre-school and school age children ages 4 and under and 5 to 19. It has the fewest adults age 35+ based on population percentages.

Fremont County Tract 9702, which includes Ashton, has a relatively more balanced age distribution.

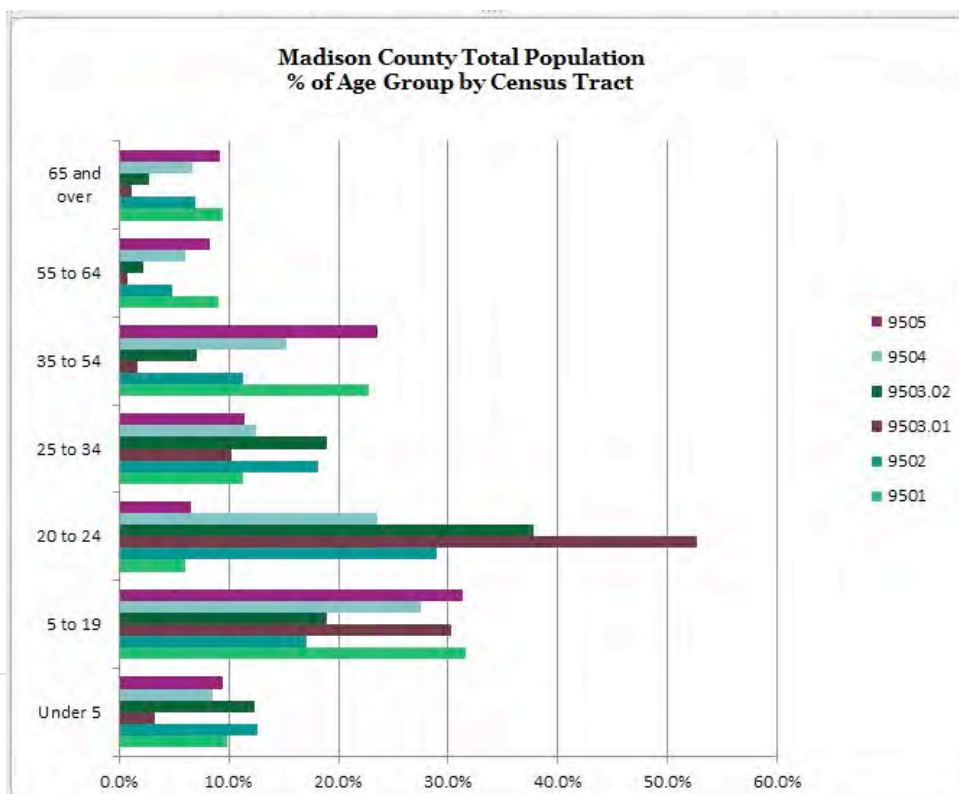


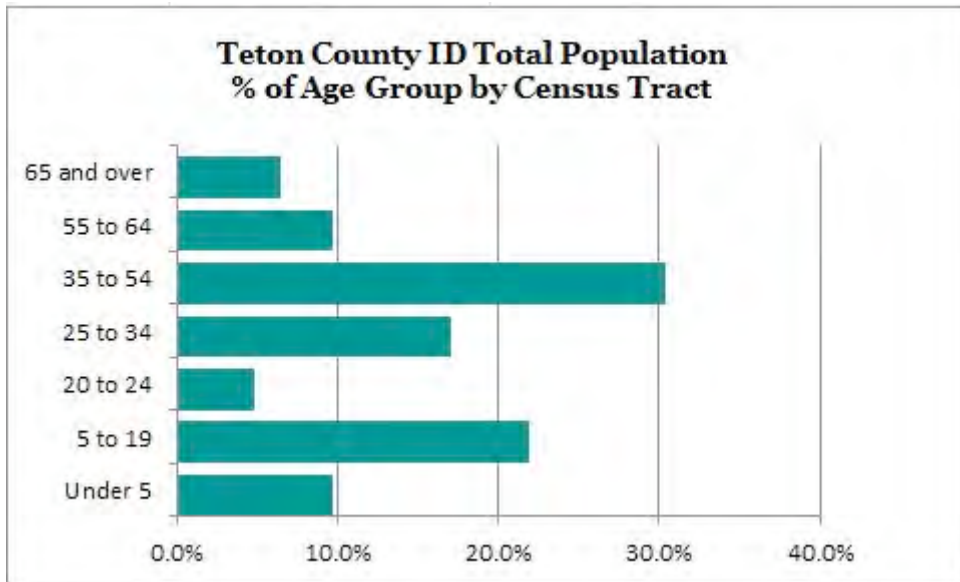
(US Census Bureau, 2010)

Madison County has six tracts that each have varying characteristics. There are no statistically significant concentrations of elderly, or preschool and school age children.

The four tracts that include portions of Rexburg are significantly higher in the age 20 to 24 age range. Which is likely contributed to the presence of BYU-Idaho.

Tracts 9501 and 9505, (the rural areas North and South of Rexburg) show remarkably similar age distributions to each other.

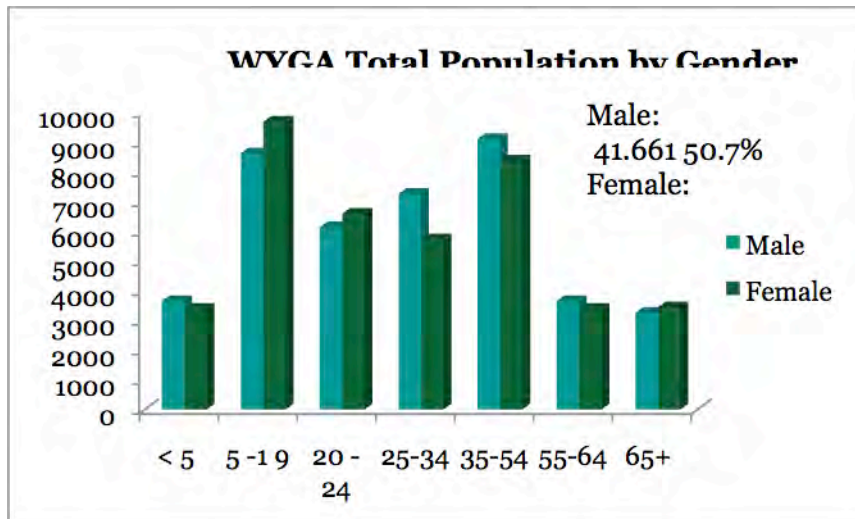




(US Census Bureau, 2010)

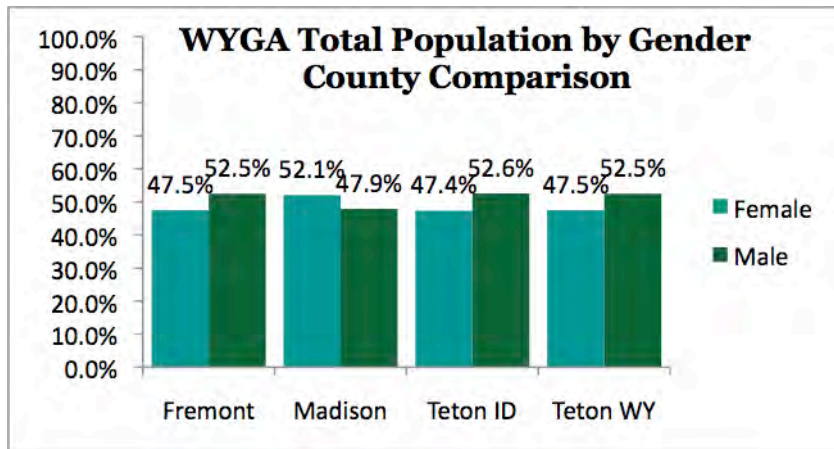
**Total Population by Gender**

The results of the analysis of total population by gender were unremarkable at the regional level. The ratio of females to males is relatively even overall, with slightly more females between the ages of 5-24, and over age 65. Males are marginally ahead in the other age groups.



(US Census Bureau, 2010)

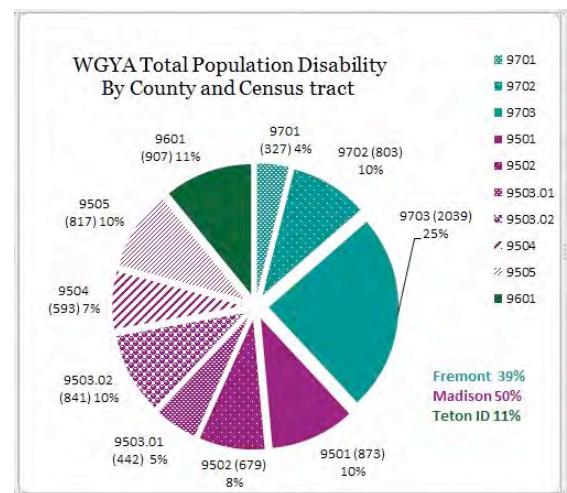
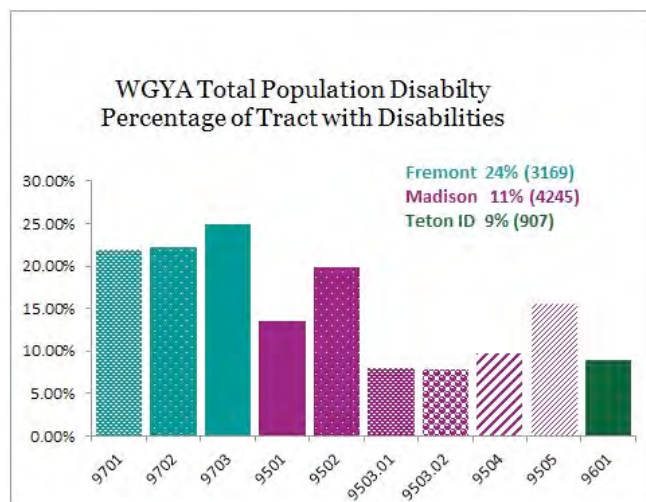
There was no statistically significant difference between the genders at the county level, with approximately 52% men in the three less populated counties. However, the ratio is reversed in Madison County with 52% females.



(US Census Bureau, 2010)

#### TOTAL POPULATION BY DISABILITY

There is a significant concentration of disabled population in all Fremont County tracts. Overall Fremont County's disabled population accounts for 24% of the total population. This is substantial when compared with the other WGYA counties. Fremont fits within the HUD criteria of reporting 10% higher concentration of disabled residents than within the WGYA region. Disability within Fremont County is high in all three county tracts.



(US Census Bureau, 2010)

A breakdown of disability by age for Fremont County follows the expected pattern based upon the population age distribution for the tracts. Tract 9701 has a significantly higher 65+ disability percentage similar to total population ratios. Over 64% of the disabled over age 65. In comparison, in tract 9703 60% of the disabled are between the ages of 16 and 64. The third tract is more evenly split between those two age groups. These disability patterns relate closely with the age distributions within the three tracts.

	Disability by Age Fremont County					
	9701	% of Disabled	9702	% of Disabled	9703	% of Disabled
5 to 15	6	1.83%	54	6.72%	106	5.20%
16 to 64	111	33.94%	327	40.72%	1227	60.18%
Over 65	210	64.22%	422	52.55%	706	34.62%
<b>Total</b>	<b>327</b>	<b>100.00%</b>	<b>803</b>	<b>100.00%</b>	<b>2039</b>	<b>100.00%</b>
<b>Disability Rate</b>	21.9%		22.2%		25.0%	

(US Census Bureau, 2010)

Teton County Idaho’s disability by age distribution is unremarkable compared to the total population distribution ratios. Just less than 9% of Teton County’s population is disabled, with each age group represented as expected based upon the overall age profile of the county. However, due to the use of just one census tract, it is not possible to evaluate for more specific concentrations within the county itself.

Teton County ID Disability by Age		
5 to 15	42	4.63%
16 to 64	533	58.77%
Over 65	332	36.60%
<b>Total</b>	<b>907</b>	
<b>Disability Rate</b>	8.9%	

(US Census Bureau, 2010)

Madison County’s Disability by Age for census tract is most easily analyzed by comparing tracts that are the most similar based on age distribution. This method allows easy comparison between census tracts with similar age profiles.

- Tracts 9501 and 9505 are rural tracts that have similar population percentages for ages > than 65.
- Tracts 9503.01 and 9503.02 include portions of the BYU Idaho campus.
- Tracts 9502 and 9504 include major sections of Rexburg, but do not include significant areas of the BYU Idaho campus.

Tract 9502 on initial preview appears to have a concentration of disabled elderly over the age of 65. Overall 9502 has a disability rate just under 20, 10% higher than expected based on comparisons with other county tracts. This disability rate is comparable to concentration rates in Fremont County. However this increase is likely due to the presence of the Rexburg Nursing Home.

	Disability by Age Madison County			
	9501	% of Disabled	9505	% of Disabled
5 to 15	33	3.78%	131	16.03%
16 to 64	491	56.24%	528	64.63%
Over 65	349	39.98%	158	19.34%
<b>Total</b>	<b>873</b>	<b>100.00%</b>	<b>817</b>	<b>100.00%</b>
<b>Disability Rate</b>	13.6%		15.6%	

	Disability by Age Madison County			
	9502	% of Disabled	9504	% of Disabled
5 to 15	38	5.60%	17	1.81%
16 to 64	331	48.75%	334	91.86%
Over 65	310	45.66%	242	6.33%
<b>Total</b>	<b>679</b>	<b>100.00%</b>	<b>593</b>	<b>100.00%</b>
<b>Disability Rate</b>	19.9%		9.7%	

	Disability by Age Madison County			
	9503.01	% of Disabled	9503.02	% of Disabled
5 to 15	8	1.81%	11	1.31%
16 to 64	406	91.86%	621	73.84%
Over 65	28	6.33%	209	24.85%
<b>Total</b>	<b>442</b>	<b>100.00%</b>	<b>841</b>	<b>100.00%</b>
<b>Disability Rate</b>	8.0%		7.8%	

(US Census Bureau, 2010)

## TOTAL POPULATION: RACE AND ETHNICITY

As a requirement of the AI an analysis of race and ethnicity is required in order to determine if there are concentrations about the regional average.

The state of Idaho has historically been a mostly white. According to the State of Idaho AI, “Idaho is becoming more diverse, largely due to the growth of the Hispanic population in the state”. Growth in the Hispanic population provided nearly 25% of all statewide population growth during the last decade. In some rural communities it accounted for over 50% of the total growth. Hispanic owned firms account for 2.6% of all Idaho businesses. <sup>9</sup>

Roughly 11.2 % of the state population is current Hispanic.

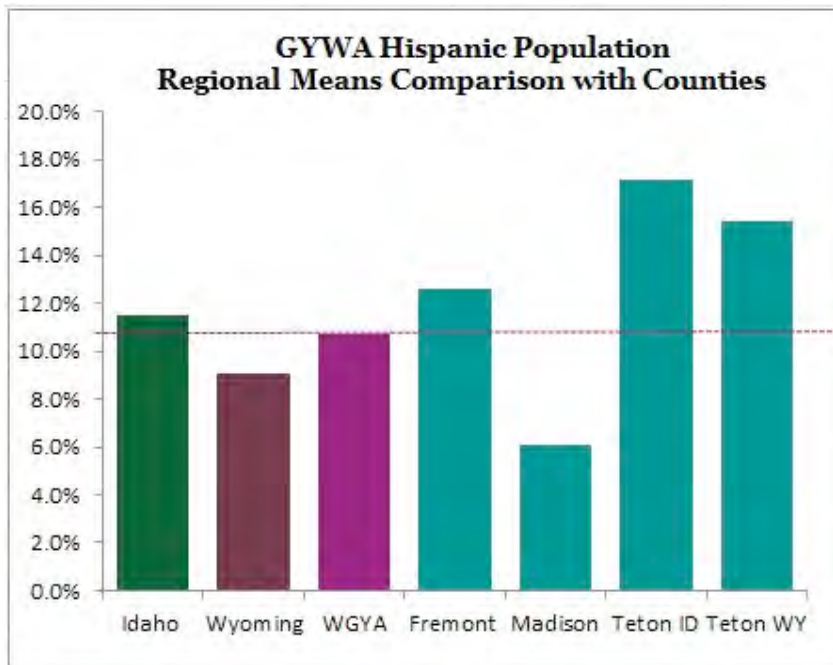
Idaho Total Population: 1,567,582

Idaho Hispanic Population: 175,901

## HISPANIC CONCENTRATIONS

The Hispanic population in the WGYA makes up 10.7% of the total population: slightly less than the State of Idaho as a whole. Within the WGYA there are counties that have higher Hispanic populations than the regional or state mean. However, in order for an area to be considered as concentrated it would need to be 10% higher than

mean.



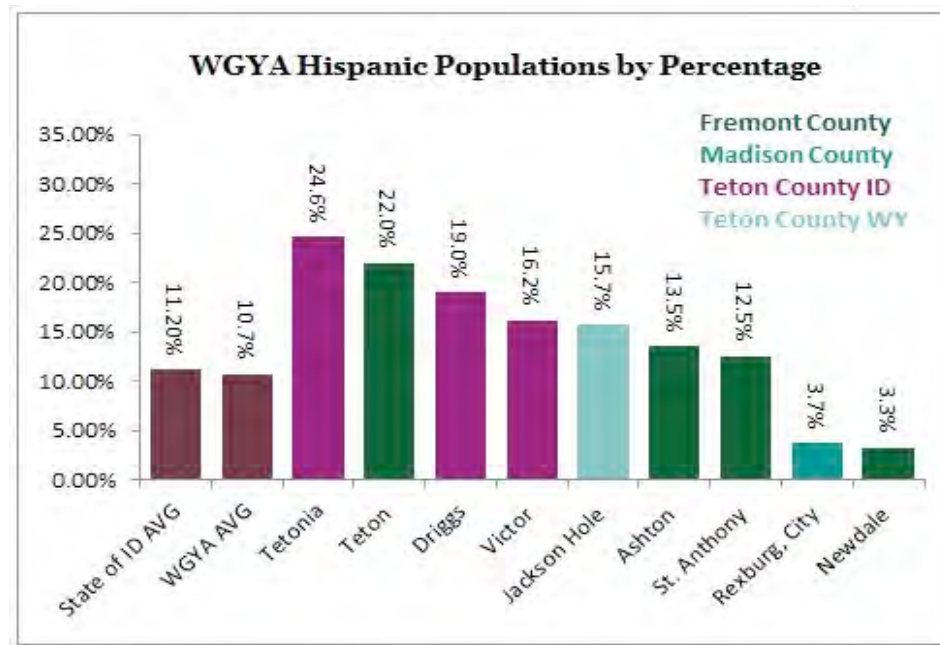
higher  
the  
regional

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<sup>9</sup> Federal Financial Institutions Examination Council. (2011). *Home Mortgage Disclosure Act & Community Reinvestment Act Census Data*.

On a county level there does not appear to be a concentration of Hispanic population that is 10% higher than the GYWA mean. However the outcome is slightly different when the region is analyzed on a community level.

There are two communities of concentration that meet the above criterion within the WGYA. In the rural community surrounding Tetonia (located in Teton County ID) the Hispanic population is 24.6%. The second area of concentration is in Teton (city) located in Fremont County with a Hispanic population of 22% within city limits.



Federal Financial Institutions Examination Council. (2011). *Home Mortgage Disclosure Act & Community Reinvestment Act Census Data*.

One of the requirements of the AI is to further analyze areas of concentrations to determine what factors have impacted the area historically, and which factors may have contributed to the concentration. Tetonia and Teton are two small communities that are approximately 30 miles apart from each other both located on highway 33. The area between the two communities is agricultural ground that is actively used for farming activities. The farms provide jobs for

many of the residents in the community including a large number of Hispanic residents.<sup>10</sup>

Historically many agricultural operations provided housing on site for agricultural workers. Workdays at times can be 18-20 hours in length with only a short break before returning to work. On site housing eliminated the need to commute.<sup>11</sup>

Historically, the housing provided had three different types:

- Group facilities for laborers to sleep, clean up, and eat. This was typically used for farm workers that did not have families staying with them.
- Small communities of single wide trailer homes that laborers could live in with their families.
- Stick built homes that were constructed for supervisors of the crew, and farm managers that provided easy access to take care of the day to day activities of the farm or ranch.<sup>12</sup>

The city of Teton has limited housing units available in town and does not have an area of impact designated with Teton County. Surrounding Zoning in the area is Agriculture. Over the course of the last decade a number of land use policies and zoning regulations at the county level have restricted the creation of housing in agricultural zones.<sup>13</sup>

In comparison, Teton (city) located in Fremont County is also within driving distance of many of the farm employment options. Housing prices and zoning regulations are relaxed within city limits. Unlike Teton, Teton has expanded gradually over recent years, and has an impact area within Fremont County's comprehensive plan. There are typically very few vacant homes within Teton city limits.

#### HISPANIC POPULATION: ENGLISH PROFICIENCY

According to 2012 census data the majority Hispanic households in the WGYA region are proficient at speaking English. This may be due to the fact that only 10% of the Hispanic population moved to Idaho over the last decade.

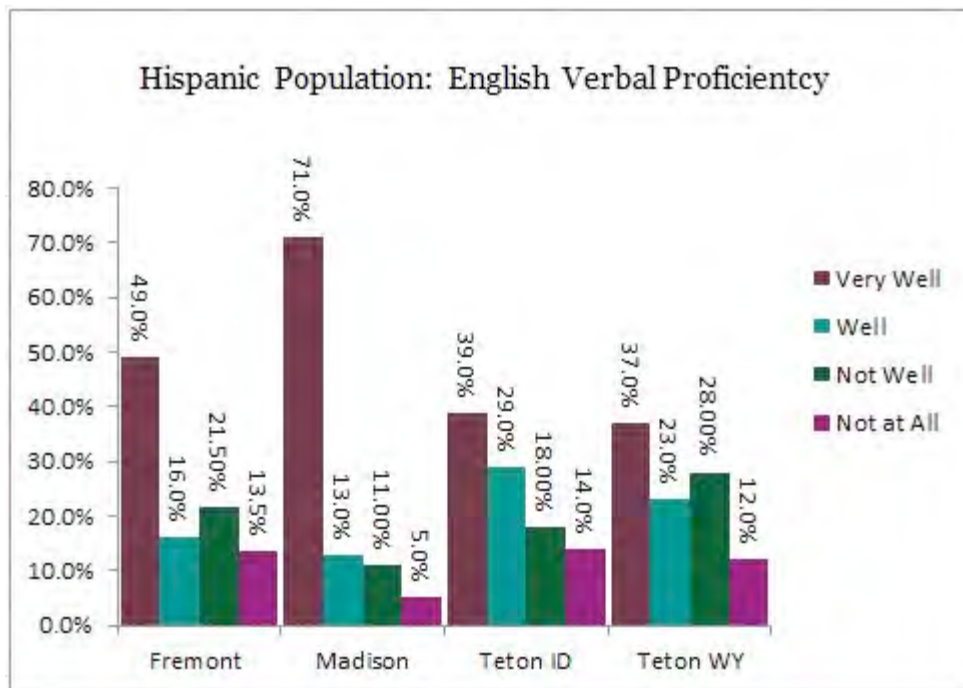
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<sup>10</sup> US Census Bureau, 2010

<sup>11</sup> BBC Research & Consulting. (May 2012). *2011 Analysis of Impediment to Fair Housing Choice*. Idaho House and Finance Association, Idaho Department of Commerce, State of Idaho, Denver Colorado.

<sup>12</sup> Interview with Local Farm Manager, November 2 2012

<sup>13</sup> County, T. (2012 ). *Teton County Comprehensive Plan 2012*.



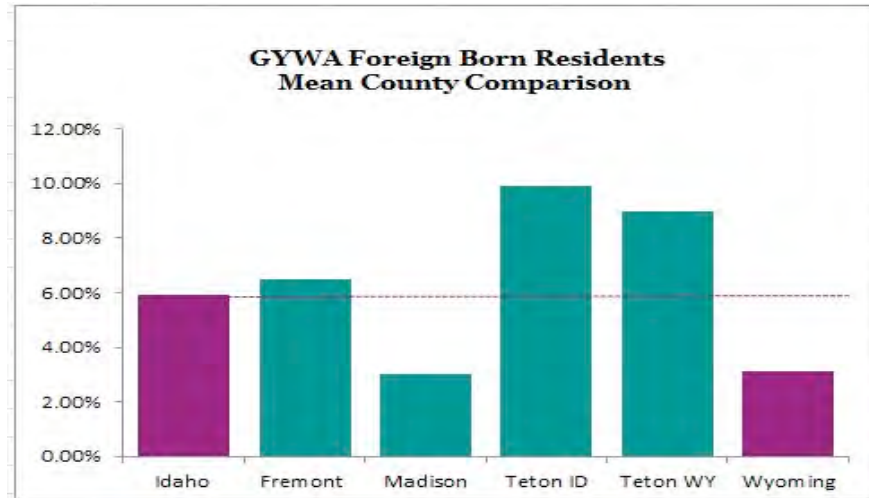
(US Census Bureau, 2010)

#### OTHER POPULATIONS: FOREIGN BORN RESIDENTS

Within the WGYA there are two locations that have populations above the mean for the “Some Other Race,” ethnic classification reported in the census. State wide this is approximately 5% of the total population. A concentration above the 5% mean is distinguishable in Teton County WY at the Rafter J Ranch (11.9%). For the outskirts of the city of Driggs this ethnic group comprises 9.5% of the total population.

Within the state of Idaho 6% of the residents in 2010 reported being born in foreign countries. 3.1 % of Wyoming residents were also born outside of the United States. Teton County Idaho and Teton County Wyoming both show a higher county mean than surrounding regions.

(US  
Census



Bureau, 2010)

The most common of foreign born residents in all four counties are of Mexican descent. In Teton County ID 78% of foreign born residents were born in Mexico compared to less than 10% in the other three counties.

Residents born in Canada are also present in all four counties, with the highest percent again in Teton County Idaho with 9%. Teton County Wyoming has a 6% Rate of Canadian born resident. Additional countries that residents were born in are listed in the table.

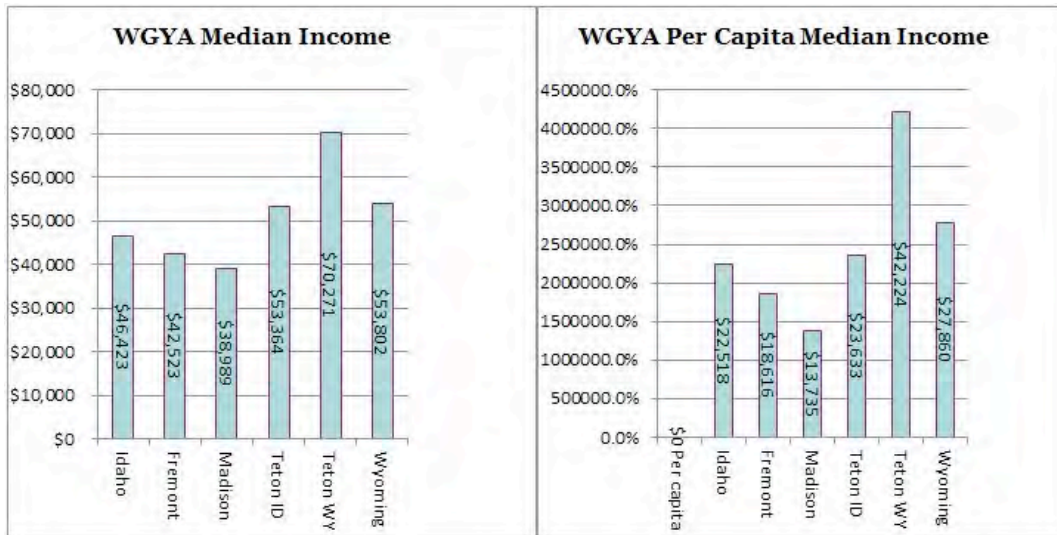
GYWA Total Population Foreign Born Residents by Percentage				
	Fremont	Madison	Teton ID	Teton WY
Austria				1%
Brazil		3%		
Cambodia				1%
Canada	2%	3%	9%	6%
Germany		3%	1%	6%
Honduras			1%	
Hong Kong			1%	
Indonesia	1%			
Ireland				1%
Italy	1%			
Mexico	9%	4%	78%	7%
Other E. Europe		2%		
Other W. Europe	4%		1%	
Phillipines	1%	3%		
Sweden		2%		
Thailand	1%			
United Kingdom			5%	5%

(US Census Bureau, 2010)

## EMPLOYMENT

### POPULATION INCOME LEVELS AND COMPARISONS

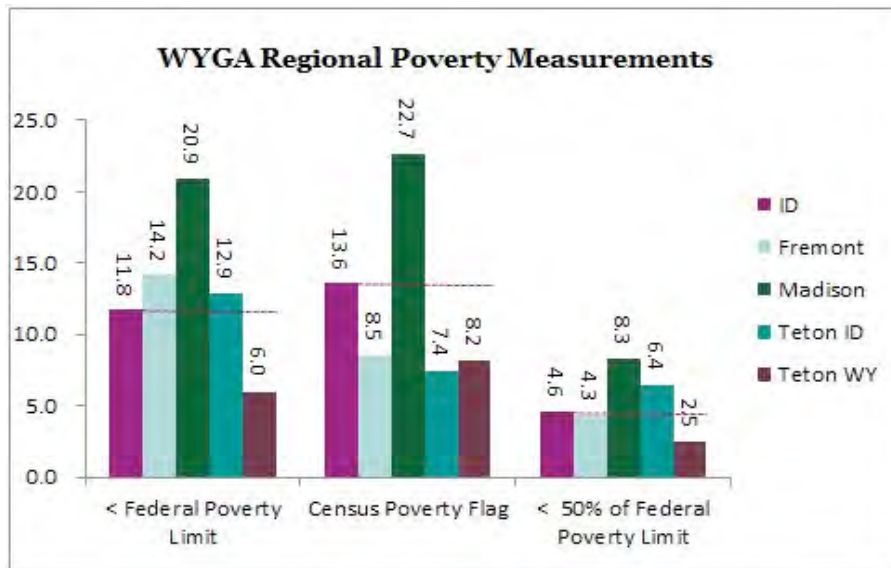
In the tables below are median incomes for each county, and the adjusted per capita mean income. Madison County's significantly lower per capita income could be influenced by the 9,416 college students included in the census. On the



other hand, Teton County WY per -capita income moved in the other direction.

(Federal Financial Institutions Examination Council, 2011)

There are three economic measures of poverty commonly used in the AI process. There is the economic poverty level established by the US government. The Census bureau uses its own criteria to indicate households living in poverty. There is also a measurement using just 50% of the US economic poverty level. Households in this category would be some of the hardest hit by the effects of poverty.



(Federal Financial Institutions Examination Council, 2011)  
 (US Census Bureau, 2010)

The Madison county rates have been adjusted to account for college students included in the percentage calculations. 3,431 of the 9,416 college students located in Madison County were adjusted out of the poverty calculations based on demographic information obtained from BYU-Idaho for 2010.

#### HOUSEHOLDS BY INCOME

A summary of households by income and tract follows. The most common income bracket for the region is the 20 -39,999 category with 25% of households. Followed by the 40-59,999 bracket with 19.5% and < 15K at 14.2%.

There are three tracts in Madison County that have a higher percentage of households in the lowest income bracket than the rest of the region. For two of the tracts mentioned previously, the lowest bracket is the most common income category. Which undoubtedly plays a factor in the higher poverty rate for Madison county overall. These three tracts are very near the campus of BYU-Idaho and may be impacted by a higher concentration of students.

## Income Bracket \* Tract ID Crosstabulation

**MOST COMMON for TRACT**      **RANKED 2<sup>ND</sup> for TRACT**      **RANKED 3<sup>RD</sup> for TRACT**

Income Bracket	Tract ID										Total
	9501	9502	9503.01	9503.02	9504	9505	9601	9701	9702	9703	
Count	108	367	215	815	147	96	299	18	130	376	2573
% within Income Bracket	4.2%	14.3%	8.4%	31.7%	5.7%	3.8%	11.6%	.7%	5.1%	14.6%	100.0%
% within Tract ID	6.3%	31.4%	20.4%	28.4%	9.3%	6.7%	7.9%	3.4%	9.8%	14.2%	14.2%
15-19.9K	49	102	170	276	163	122	135	70	82	123	1292
% within Income Bracket	3.8%	7.9%	13.2%	21.4%	12.6%	9.4%	10.4%	5.4%	6.3%	9.5%	100.0%
% within Tract ID	2.8%	8.7%	16.1%	9.6%	10.3%	8.3%	3.6%	13.2%	6.2%	4.7%	7.1%
20-39.9K	441	350	357	749	373	487	807	132	450	688	4834
Count	9.1%	7.2%	7.4%	15.5%	7.7%	10.1%	16.7%	2.7%	9.3%	14.2%	100.0%
% within Income Bracket	25.6%	30.0%	33.8%	25.1%	23.5%	33.2%	21.3%	24.8%	33.8%	25.1%	25.6%
% within Tract ID	21.0%	13.6%	20.1%	13.4%	13.5%	18.7%	25.9%	18.0%	16.7%	24.7%	19.5%
40-59.9 K	361	159	212	385	215	274	979	96	222	651	3554
Count	10.2%	4.5%	6.0%	10.8%	6.0%	7.7%	27.5%	2.7%	6.2%	18.3%	100.0%
% within Income Bracket	21.0%	13.6%	20.1%	13.4%	13.5%	18.7%	25.9%	18.0%	16.7%	24.7%	19.5%
% within Tract ID	21.0%	13.6%	20.1%	13.4%	13.5%	18.7%	25.9%	18.0%	16.7%	24.7%	19.5%
60-74.9K	232	60	21	345	252	134	457	110	125	270	2047
Count	11.3%	2.9%	1.0%	15.9%	12.8%	6.5%	23.8%	5.4%	6.2%	13.2%	100.0%
% within Income Bracket	13.5%	5.1%	2.0%	12.0%	16.5%	9.1%	12.9%	20.7%	9.5%	10.2%	11.3%
% within Tract ID	13.5%	5.1%	2.0%	12.0%	16.5%	9.1%	12.9%	20.7%	9.5%	10.2%	11.3%
75-99.9K	299	95	36	99	189	236	544	65	222	241	2026
Count	14.8%	4.7%	1.8%	4.9%	9.3%	11.6%	26.9%	3.2%	11.0%	11.9%	100.0%
% within Income Bracket	17.4%	8.1%	3.4%	3.5%	11.9%	16.1%	14.4%	12.2%	16.7%	9.1%	11.2%
% within Tract ID	17.4%	8.1%	3.4%	3.5%	11.9%	16.1%	14.4%	12.2%	16.7%	9.1%	11.2%
100-124.9K	118	23	44	79	125	41	315	18	32	143	938
Count	12.6%	2.5%	4.7%	8.4%	13.3%	4.4%	33.6%	1.9%	3.4%	15.2%	100.0%
% within Income Bracket	6.8%	2.0%	4.2%	2.8%	7.9%	2.8%	8.3%	3.4%	2.4%	5.4%	5.2%
% within Tract ID	6.8%	2.0%	4.2%	2.8%	7.9%	2.8%	8.3%	3.4%	2.4%	5.4%	5.2%
125-149.9K	59	2	0	22	27	17	57	5	24	60	273
Count	21.6%	.7%	.0%	8.1%	9.9%	6.2%	20.9%	1.8%	8.8%	22.0%	100.0%
% within Income Bracket	3.4%	.2%	.0%	.8%	1.7%	1.2%	1.5%	.9%	1.8%	2.3%	1.5%
% within Tract ID	3.4%	.2%	.0%	.8%	1.7%	1.2%	1.5%	.9%	1.8%	2.3%	1.5%
150-199.9K	56	0	0	36	38	38	110	18	36	28	360
Count	15.6%	.0%	.0%	10.0%	10.6%	10.6%	30.6%	5.0%	10.0%	7.8%	100.0%
% within Income Bracket	3.3%	.0%	.0%	1.3%	2.4%	2.6%	2.9%	3.4%	2.7%	1.1%	2.0%
% within Tract ID	3.3%	.0%	.0%	1.3%	2.4%	2.6%	2.9%	3.4%	2.7%	1.1%	2.0%
200K +	0	9	0	62	50	19	53	0	9	59	261
Count	.0%	3.4%	.0%	23.8%	19.2%	7.3%	20.3%	.0%	3.4%	22.6%	100.0%
% within Income Bracket	.0%	.8%	.0%	2.2%	3.1%	1.3%	1.4%	.0%	.7%	2.2%	1.4%
% within Tract ID	.0%	.8%	.0%	2.2%	3.1%	1.3%	1.4%	.0%	.7%	2.2%	1.4%
Total	1723	1167	1055	2868	1589	1466	3786	532	1333	2639	18158
Count	9.5%	6.4%	5.8%	15.8%	8.8%	8.1%	20.9%	2.9%	7.3%	14.5%	100.0%
% within Income Bracket	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
% within Tract ID	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

**MOST COMMON OCCUPATIONS BY GENDER AND COUNTY**

FREMONT MOST COMMON OCCUPATIONS			
	Men	Women	
Agricultural	7	5	
Cashier		5	
Child Care and teachers		6	
Driver	8		
Farm Manager	5		
General Labor	5	5	
Other Sales	6		
Production	4	4	
Records Clerk		4	
Repair Services	6		
Secretary		5	

TETON WY MOST COMMON OCCUPATIONS			
	Men	Women	
Carpentry	8%		
Cleaning	4%	7%	
Construction	3%		
Construction Supervisor	3%		
Electrical	4%		
Office Support		4%	
Other manage	8%	5%	
Other Sales	5%	7%	
Retail Sales - Not			
Cashier		4%	
Secretary		6%	
Waitress		4%	

MADISON MOST COMMON OCCUPATIONS			
	Men	Women	
Building Mainten	6%	3%	
Child Care and teachers		5%	
Driver	5%		
Farmers, Farm Manage	5%		
Gen Labor	3%		
Misc. Manage	5%		
Other educaitional		5%	
Other Sales	4%		
Post 2nd teach	6%		
Records Clerk		10%	
Retail Clerk		4%	
Secretary		9%	

TETON ID MOST COMMON OCCUPATIONS			
	Men	Women	
Carpenter	8%		
Farm Manager	8%		
Agricultural	7%		
Manage - Non Farm	6%		
Construction	6%		
Driver	4%		
Repair Services	4%		
Cleaning		7%	
Secretary		7%	
Retail Sales		5%	
Child Care and teachers		5%	
Registered Nurse		5%	
Other Sales		4%	
Cooking		4%	

US Census Bureau. (2010). *2010 Census Data Summary File 1 & 2*.

**WORKFORCE: FAMILIAL EMPLOYMENT**

The following tables provide information on what percentage of children (by age) have parents employed in the workforce. For example: In Fremont

County, in households with children under the age of 6, 55% of those children have all their parents in the household working.

<b>FREMONT COUNTY</b>					
<b>Population 16 years and over: Percentage in the work force</b>					
	% in Work force	% Female in Work Force	Female with Kids < age 6	Female with Kids ages 6-17	< 6 ALL Parents in household working
Fremont	63.2	54.7	58.5	70.1	55
Ashton	58.5	47.2	52.9	68.7	53.9
Drummond	64.3	66.7	x	x	x
Island Park	75.8	70.7	100.0	70.6	100.0
Newdale	62.6	51.5	60.7	71.9	55.9
Parker	56.1	43.9	61.3	50.0	62.8
St. Anthony	65.9	57.9	52.3	70.7	48.1
Teton city	71.2	65.3	74.2	73.0	78.9
Warm River	66.7	66.7	x	x	x

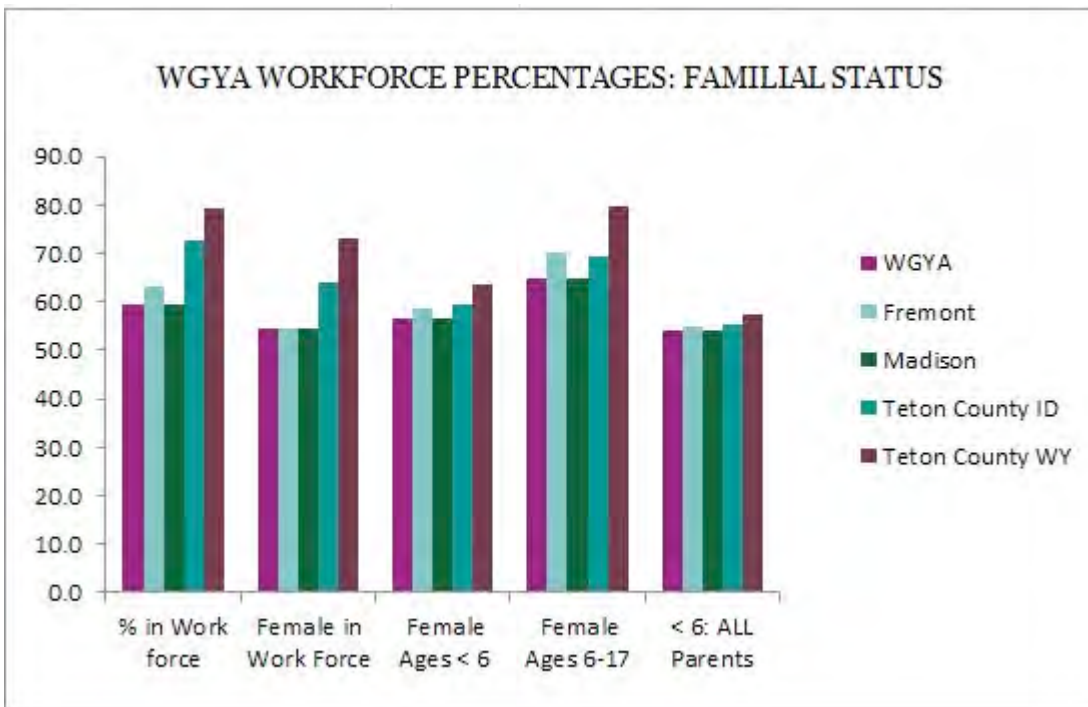
<b>MADISON COUNTY</b>					
<b>Population 16 years and over: Percentage in the work force</b>					
	% in Work force	% Female in Work Force	Female with Kids < age 6	Female with Kids ages 6-17	< 6 ALL Parents in household working
Madison	59.3	54.5	56.5	65.0	54.3
Moody Creek Area	51.7	41.4	23.5	16.4	62.1
Sugar City Area	65.6	52.8	48.3	59.0	51.3
Thorton Area	70.8	59.1	46.0	58.3	39.0
Rexburg	55.0	53.4	65.4	72.4	63.5
Sugar City	71.2	65.5	54.9	74.9	50.8

US Census Bureau. (2010). *2010 Census Data Summary File 1 & 2*.

<b>TETON COUNTY IDAHO</b>					
<b>Population 16 years and over: Percentage in the work force</b>					
	% in Work force	% Female in Work Force	Female with Kids < age 6	Female with Kids ages 6-17	< 6 ALL Parents in household working
Teton County	72.8	63.9	59.6	69.3	55.3
Driggs City	69.4	58.9	72.7	74.6	67.4
Driggs Remainder	66.8	62.6	66.2	88.0	61.2
Tetonia City	75.3	71.3	100.0	87.9	100.0
Tetonia Remainder	71.5	58.2	51.9	53.0	40.1
Victor City	79.0	72.5	64.3	75.0	63.6
Victor Remainder	76.2	65.2	45.1	57.1	48.5

<b>TETON COUNTY WYOMING</b>					
<b>Population 16 years and over: Percentage in the work force</b>					
	% in Work force	% Female in Work Force	Female with Kids < age 6	Female with Kids ages 6-17	< 6 ALL Parents in household working
Teton County	79.4	73.2	63.8	79.7	57.5
Alta	71.9	64.5	75.7	63.4	89.2
Hoback	80.8	71.8	70.4	74.2	61.7
Jackson Hole	84.0	78.9	60.8	83.5	49.8
Moose Wilson	74.6	67.2	47.8	84.2	39.6
Rafter J Ranch	90.0	86.7	60.3	89.6	61.7
South Park	81.9	75.8	100.0	91.1	100.0
Teton Village	43.2	36.5	57.1	0.0	75.0
Wilson	74.1	68.9	75.0	57.9	80.6

US Census Bureau. (2010). *2010 Census Data Summary File 1 & 2*.



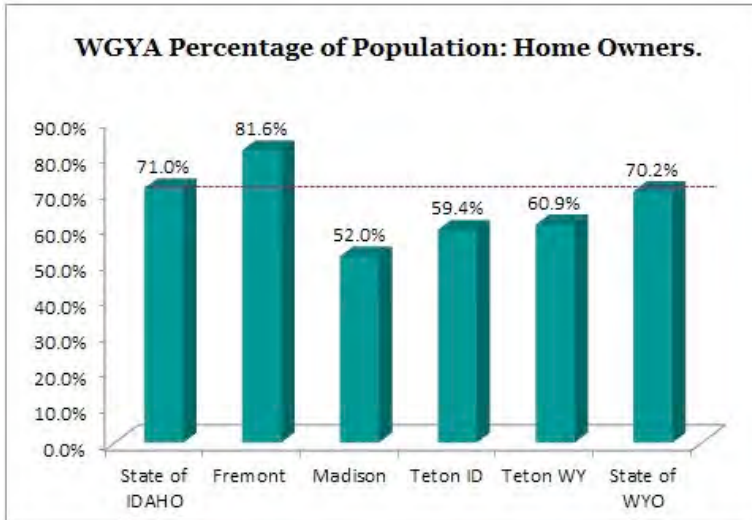
US Census Bureau. (Summary File 3, 2000). *Employment Status and Commuting to Work, Subdivision and Place.*

#### HOME OWNERSHIP

Three of the four counties in the region had lower home ownership rates than either Idaho or Wyoming’s average. Madison County has the lowest home ownership rate in the region, followed by Teton County ID, and Teton County Wyoming. Fremont County actually exceeds the Idaho Mean by over 10 percent.<sup>15</sup>

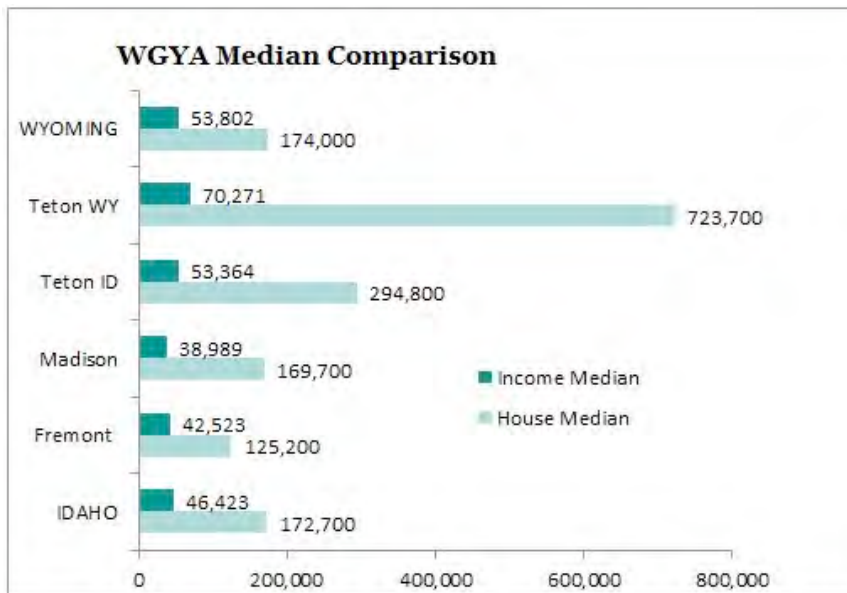
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<sup>15</sup> Federal Financial Institutions Examination Council. (2011). *Home Mortgage Disclosure Act & Community Reinvestment Act Census Data.*



Federal Financial Institutions Examination Council. (2011). *Home Mortgage Disclosure Act & Community Reinvestment Act Census Data.*

One factor that influences the ability of a population to own a home is the cost of the home in relationship to income. The following figures contained the cost of median priced homes correlating with median income levels at the county level.



Federal Financial Institutions Examination Council. (2011). *Home Mortgage Disclosure Act & Community Reinvestment Act Census Data.*

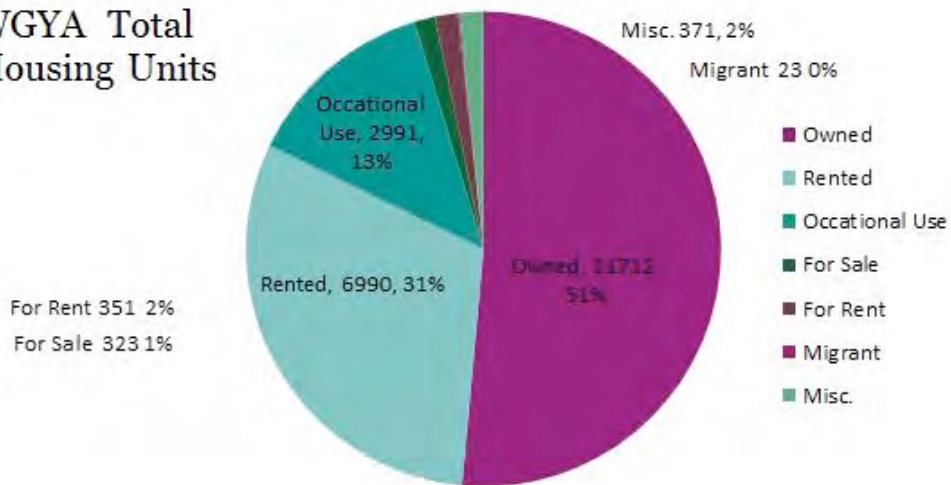
## HOUSING PROFILE

The information contained in this was obtained from the Federal Financial Institutions Examinations Council (FFIEC) Census data for 2011. The private housing units contracted with BYU Idaho are excluded from the FFEIC data.

### HOUSING UNITS: WGYA

There are over 37,000 housing units in the WGYA. Ninety-five percent of the units are occupied, full, or part time. Only 3% of the units are available for occupation.

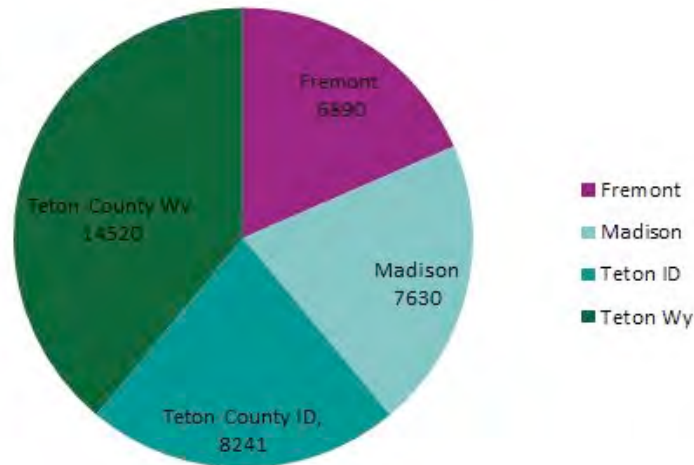
#### WGYA Total Housing Units



Federal Financial Institutions Examination Council. (2011). *Home Mortgage Disclosure Act & Community Reinvestment Act Census Data*.

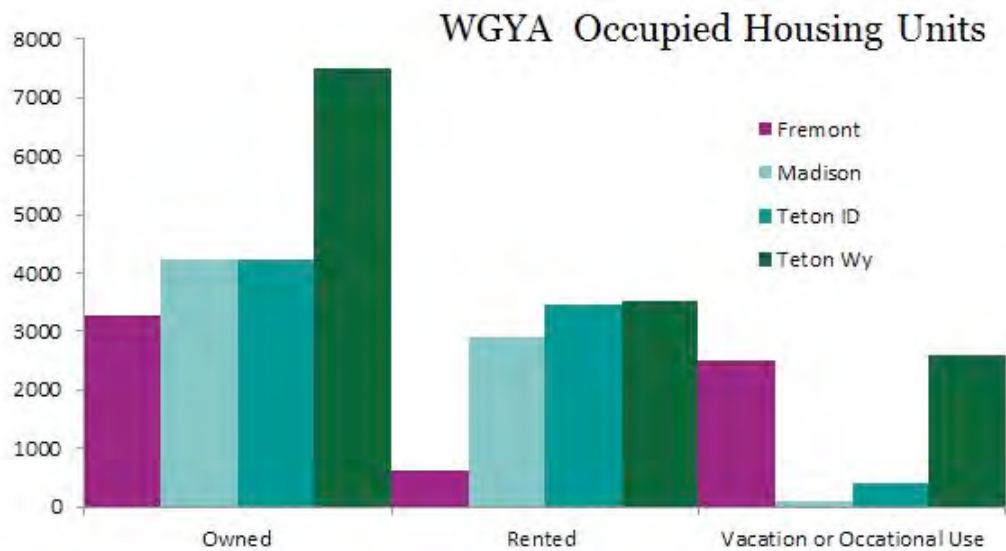
A breakdown of where the housing units are located by county shows that Teton WY has the largest number of units in the region, and Fremont the least.

## WGYA Total Housing Units



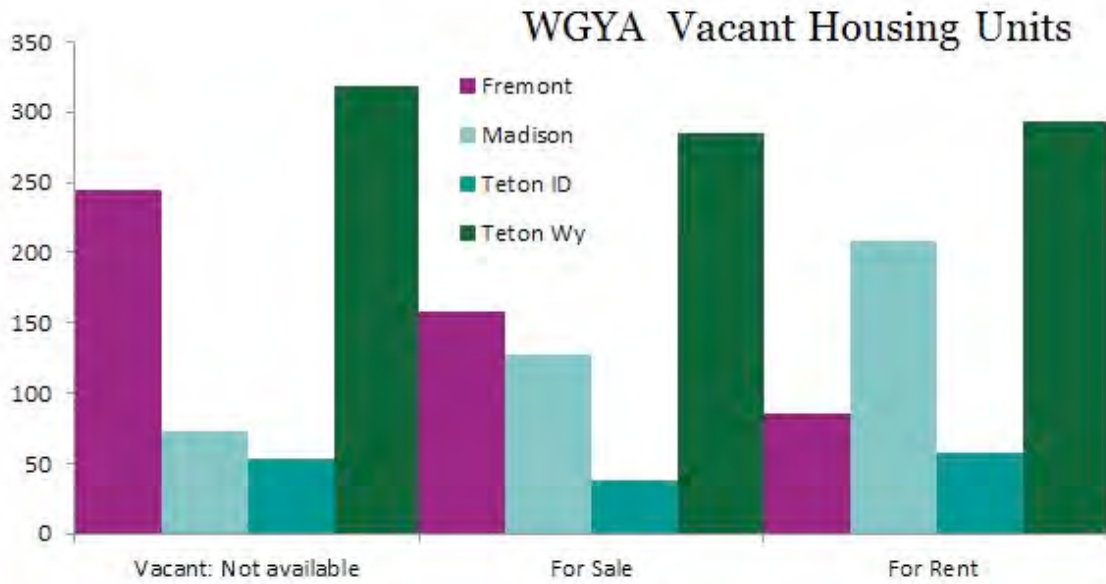
Federal Financial Institutions Examination Council. (2011). *Home Mortgage Disclosure Act & Community Reinvestment Act Census Data*.

A breakdown of the occupied housing units demonstrated the differences between the counties. Despite Fremont County having the lowest number of total housing units, it has one of the highest numbers of units that are occupied on a part times or seasonal basis: comparable only to Teton County WY.



Federal Financial Institutions Examination Council. (2011). *Home Mortgage Disclosure Act & Community Reinvestment Act Census Data*.

Vacant housing in the region is mostly composed of three categories. 1) For sale 2) For rent 3) Vacant but not available. Teton County ID has the least number of vacant units in all three categories.



Federal Financial Institutions Examination Council. (2011). *Home Mortgage Disclosure Act & Community Reinvestment Act Census Data*.

#### BROOKINGS AFFORDABILITY INDEX

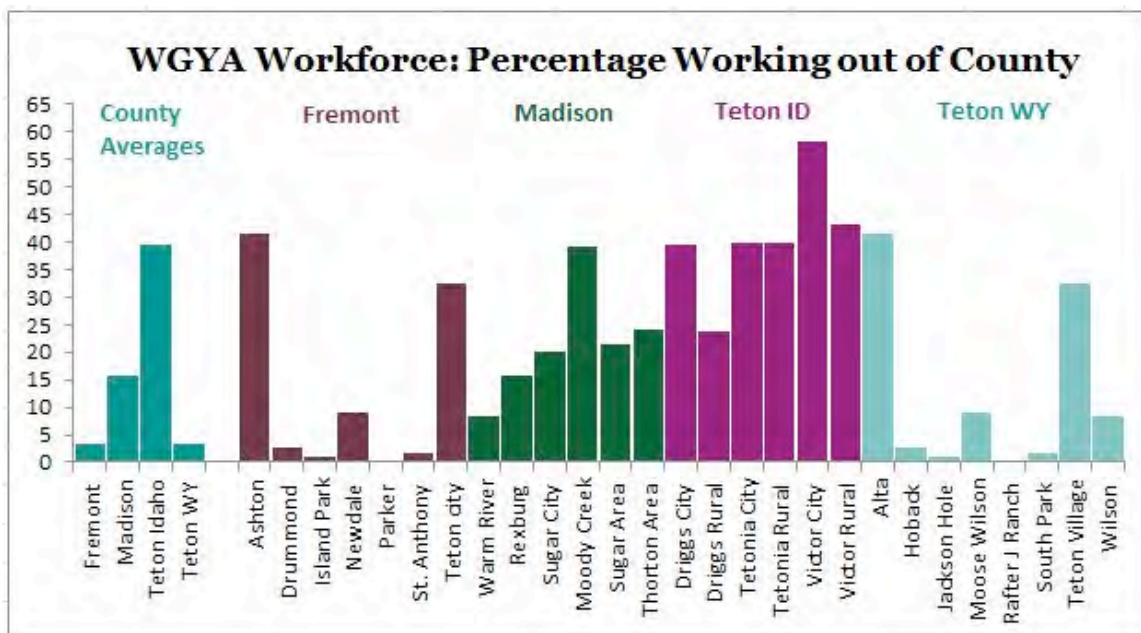
The Brookings Affordability Index is based on the premise that transportation costs should be included in a working model of the costs to live in a specific community. The transportation costs that are incurred due to location are a part of the true housing cost to live in the area. Just as utility costs are figured in based on area rates, so should the cost of transportation. The “housing + transportation” cost concept was originally applied by the mortgage industry as a “location efficiency value.” This method allows for a more accurate comparison of housing costs in less expensive rural neighborhoods that have longer commute times with more expensive urban communities that have public transportation available. Although the Brookings Affordability Index is not currently available, an assessment of the number of residents within an area that work outside the county and the number of miles they commute are considered to determine the availability of fair housing.

The length of commute time has a direct impact on the ability to afford housing in an area. In the assessment of available fair housing, households that have a higher combined “housing + transportation” expense, higher than 30-35% median income, are at a higher risk for homelessness, foreclosure, and eviction especially during economic downturns.

In the WGYA there are a number of communities that are likely to have higher transportation costs as a result of their location. Two quantitative measurements available through the census are the percentage of residents that work out of the county and the average length of commute (one way). This community information for those factors is given below.

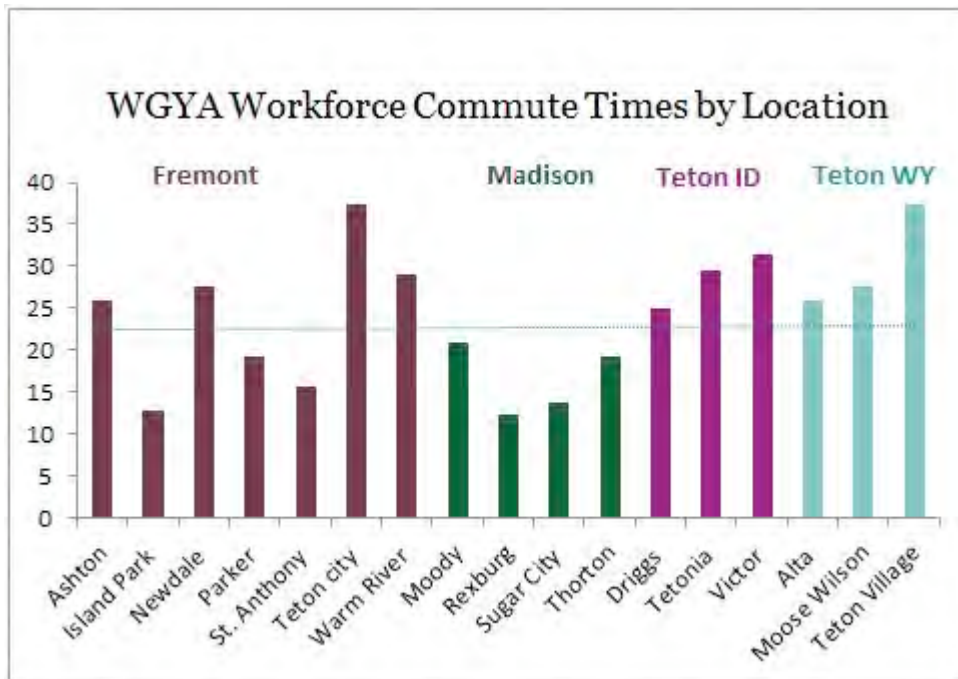
**LIVING, WORKING, COMMUTING**

Another important economic measurement is the transportation costs that are incurred by the workforce. One determining factor is where the income is earned in comparison to where the worker lives.



US Census Bureau. (Summary File 3, 2000). *Employment Status and Commuting to Work, Subdivision and Place.*

How far the workforce is commuting is another economic indicator that contributes to transportation costs.



US Census Bureau. (Summary File 3, 2000). *Employment Status and Commuting to Work, Subdivision and Place.*

Communities that have a large percentage of their workforce commuting out of the county or that have increased commute times may face unique challenges for fair housing.<sup>16</sup> A Brookings Affordability Index will be more critical for these counties or regions when completing the housing profile of the AI. When the Brookings Affordability Index is not utilized in this situation there is an increased risk of foreclosure, eviction, and loss of housing do to a higher actual cost burden than originally estimated.

#### ESTIMATING TRANSPORTATION COSTS

The US department of transportation estimates the cost of car ownership to be just over \$8,000 a year. AAA places the cost of ownership mean at \$6,114 + 17.75 cents per mile.<sup>17</sup> The average annual miles driven for workforce age groups is roughly 18K for males and 11.5K for females: with a mean of 15K annually.<sup>18</sup> Using these two factors the estimated transportation cost is \$8776

<sup>16</sup> Partnership for Sustainable Rural Communities. (2012). *Federal Resources for Sustainable Rural Communities*. Housing and Urban Development, Department of Transportation, Environmental Protection Agency, USDA

<sup>17</sup> AAA Your Driving Costs 2011 Edition

<sup>18</sup> Federal Highway Administration Highway Statistics April 4, 2011

annual for the first automobile in a household, and \$7534 for a second calculated at 8K miles a year.

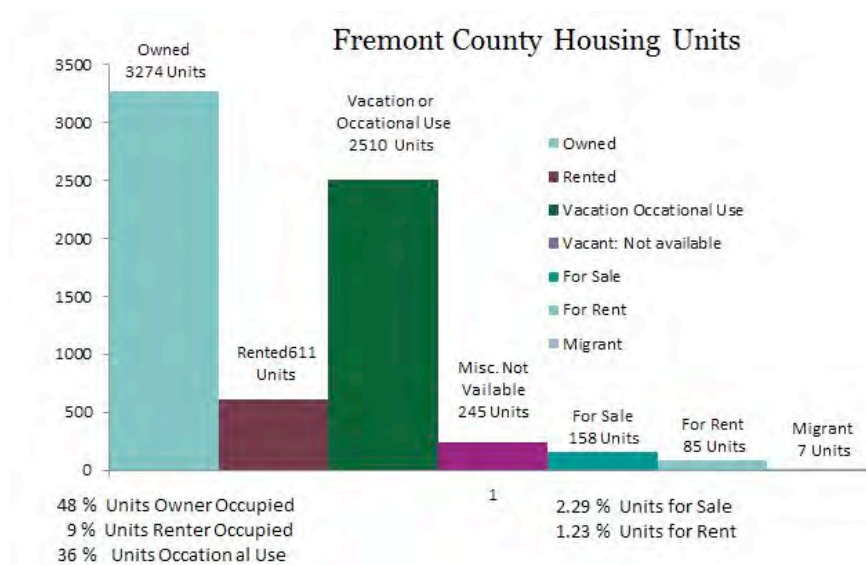
Transportation costs are estimated to range from 10 to 25% of household expenditures. By examining transportation costs associates with an area the Affordability Index may provide a better tool for housing affordability. (American Planning Association, Adopted April 2006 )

Many of the communities within the region do not have access to a variety of transportation methods for where they live. For households with multiple wage earners additional autos may be needed.

## FREMONT COUNTY

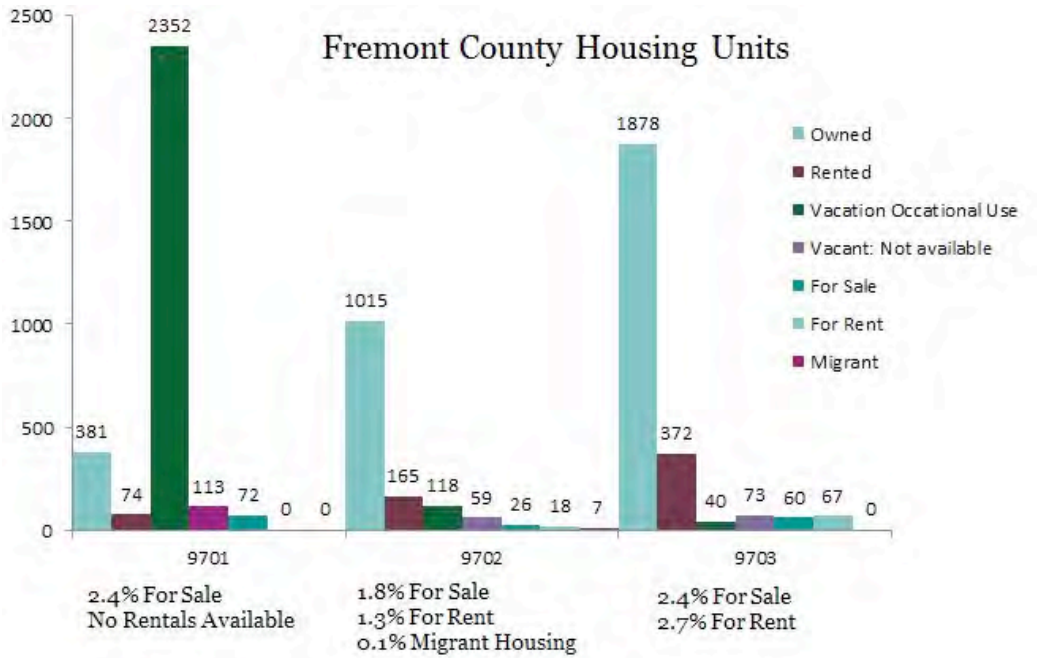
### HOUSING UNITS

In Fremont County there is an extremely high concentration of housing units that are designated as seasonal / occasional use. Almost 36 % of the total housing units are properties used for part time occupation.



Federal Financial Institutions Examination Council. (2011). *Home Mortgage Disclosure Act & Community Reinvestment Act Census Data*.

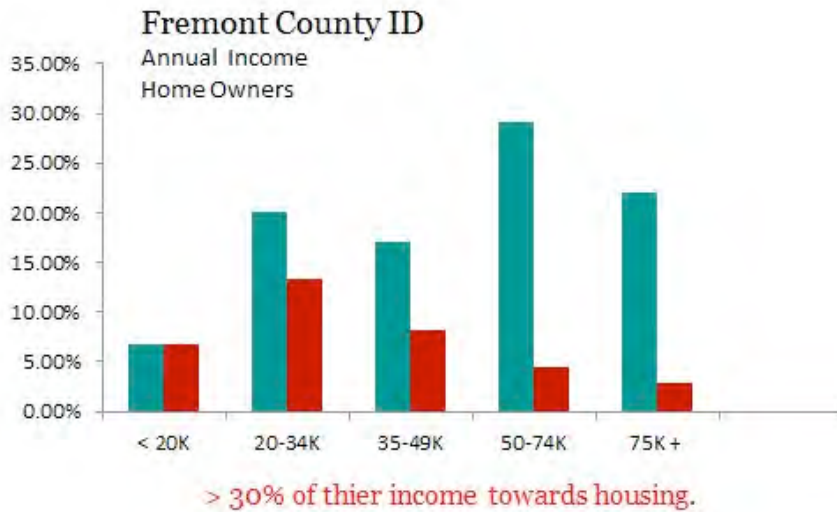
A closer examination of the housing units located in Fremont County reveals that the majority of the part time use housing units are located in census tract 9701 in the Island Park area. Additionally, the majority of the rental units available are located in census tract 9703 that includes St. Anthony.

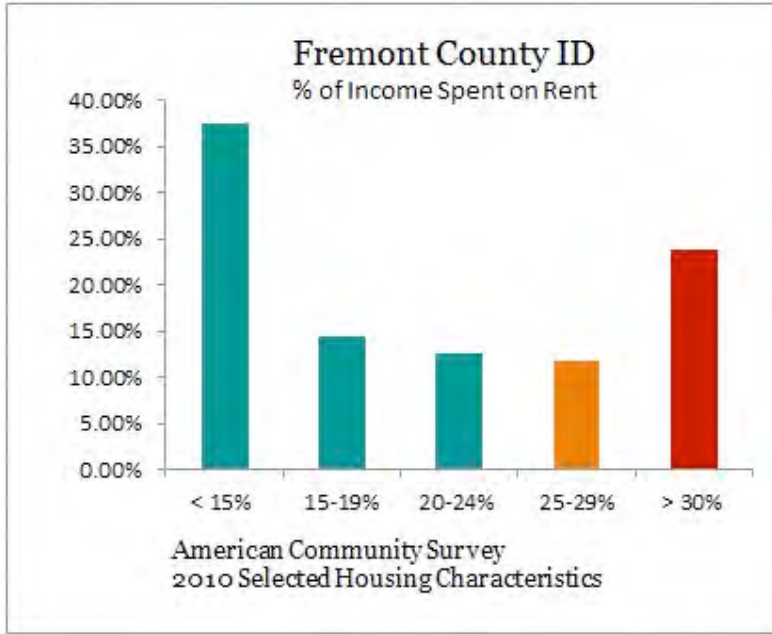


Federal Financial Institutions Examination Council. (2011). Home Mortgage Disclosure Act & Community Reinvestment Act Census Data.

#### COST BURDEN

The cost burden for Fremont County is broken down into two separate groups: home owners and renters. Housing Units that are considered vacant or only used part time are not included in the analysis of cost burden. The information given below is provided by the census bureau.





Federal Financial Institutions Examination Council. (2011). Home Mortgage Disclosure Act & Community Reinvestment Act Census Data.

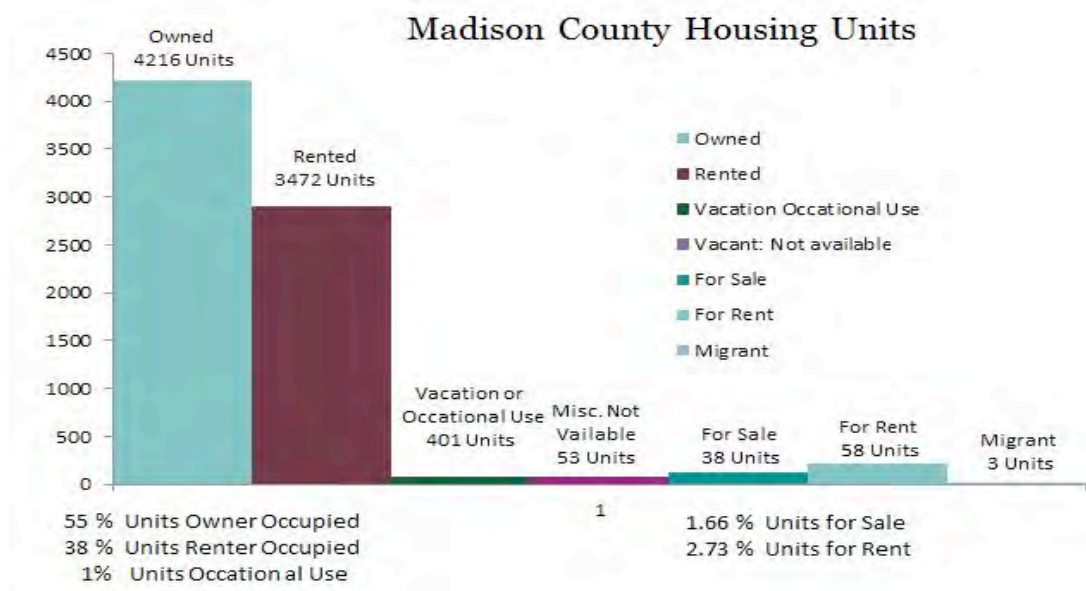
#### HOUSING ISSUES: AGE AND PLUMBING



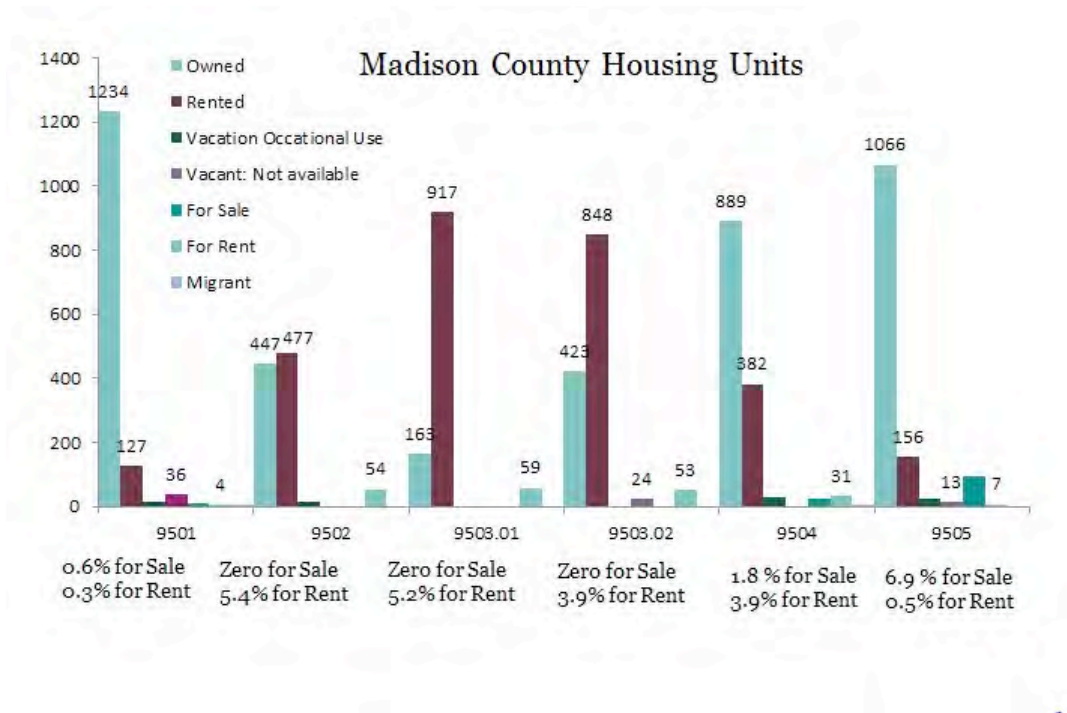
Federal Financial Institutions Examination Council. (2011). Home Mortgage Disclosure Act & Community Reinvestment Act Census Data.

### HOUSING UNITS: MADISON COUNTY

In comparison Madison County has very few housing units that are used on a part time basis. The majority of the units are comprised of Owner and Renter Occupied Units.



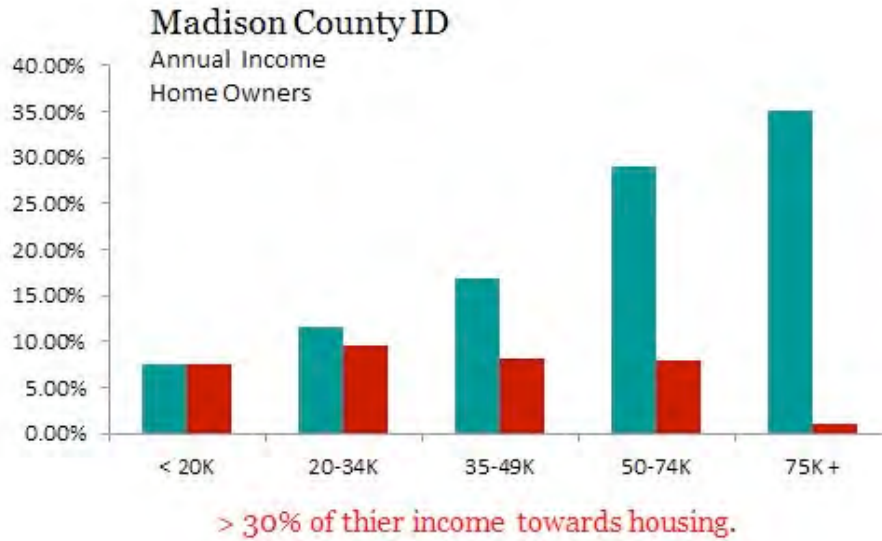
Within Madison County there are six census tracts. Within these tracts there are stark differences between the ratio of Owner Occupied and Rental units.



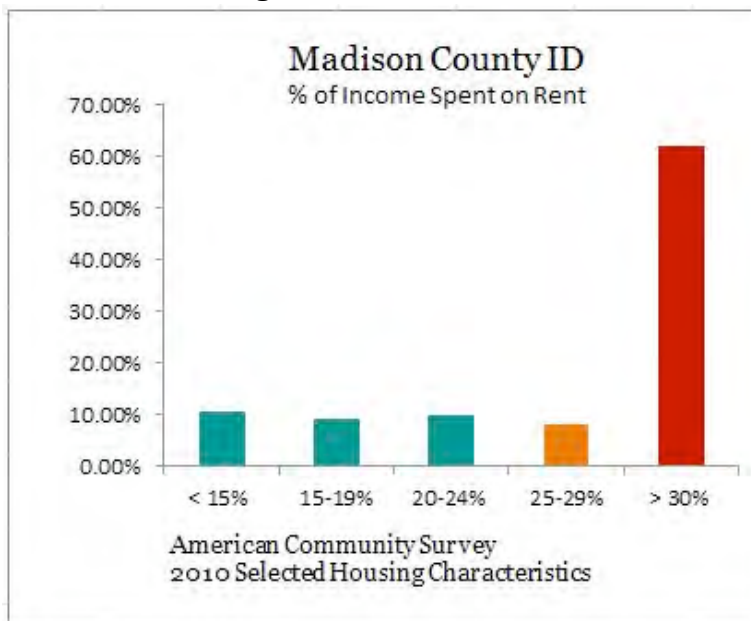
Federal Financial Institutions Examination Council. (2011). Home Mortgage Disclosure Act & Community Reinvestment Act Census Data.

**COST BURDEN**

The cost burden for Madison County is broken down into two separate groups: home owners and renters. Housing Units that are considered vacant or only used part time are not included in the analysis of cost burden. The information given below is provided by the census bureau.



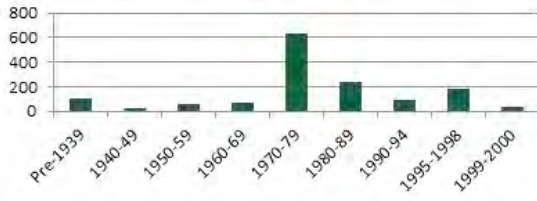
Madison county has over 60% of renters spending over 30% of the household income on housing costs.



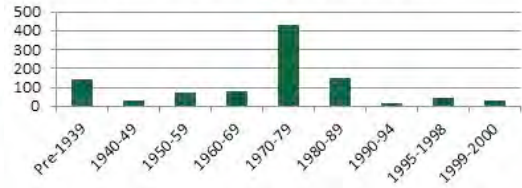
Federal Financial Institutions Examination Council. (2011). Home Motgage Disclosure Act & Community Reinvestment Act Census Data.

## HOUSING ISSUES: AGE AND PLUMBING

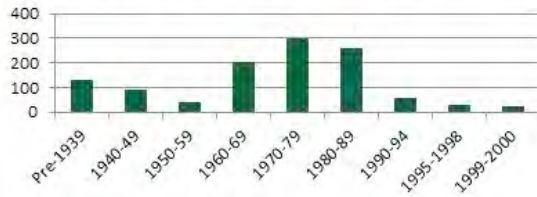
### House Unit Age: 9501



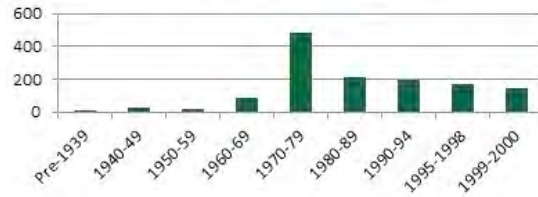
### House Unit Age: Tract 9502



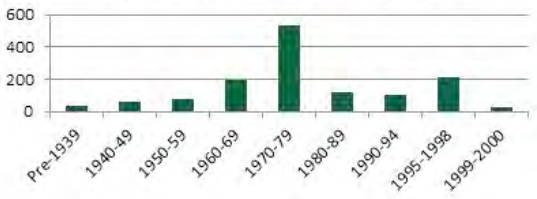
### House Unit Age: Tract 9503.01



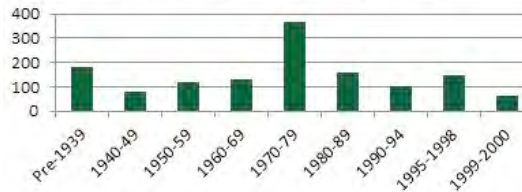
### House Unit Age: Tract 9503.02



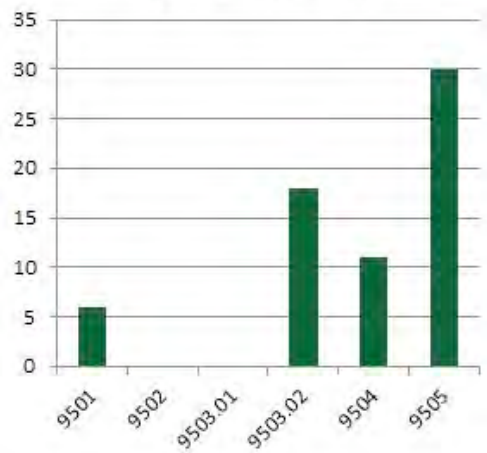
### House Unit Age: Tract 9504



### House Unit Age: Tract 9505

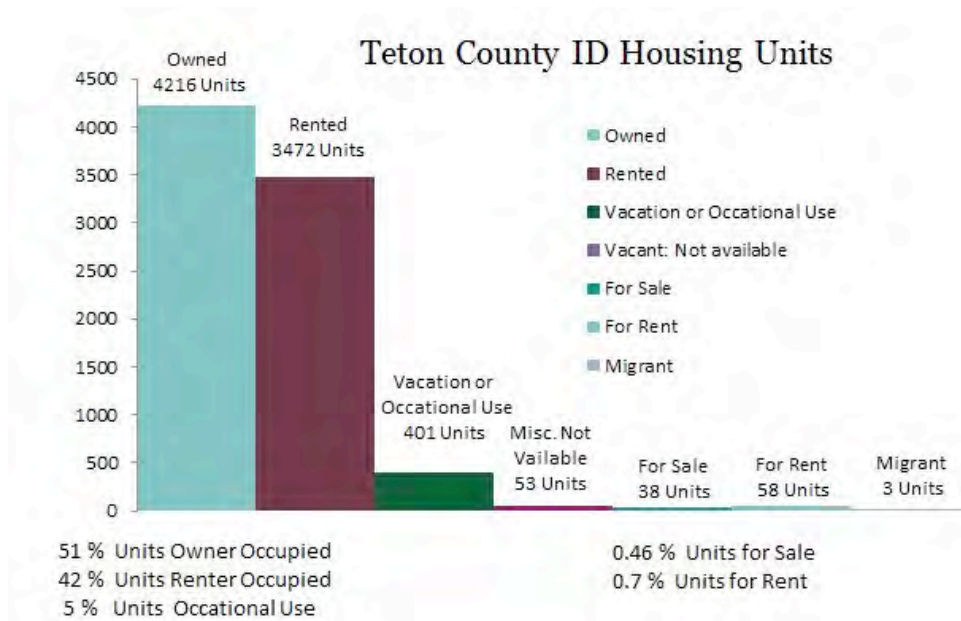


### No Plumbing



## HOUSING UNITS: TETON COUNTY IDAHO

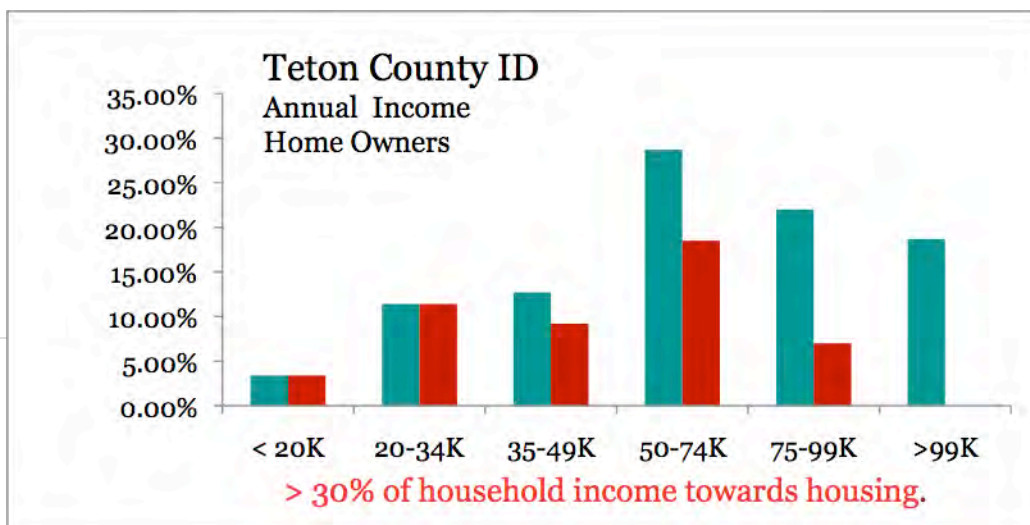
In Teton County Idaho, 98% of all the housing units are occupied. Less than one percent are available for rent, and less than half of a percent are for sale. There is only one census tract in this count



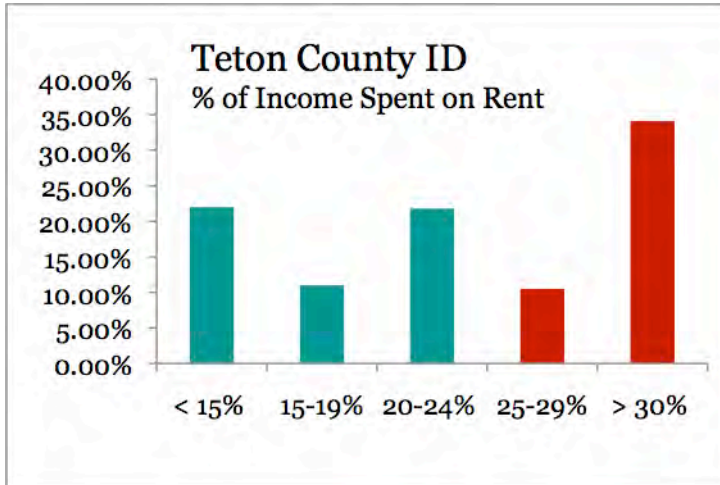
Federal Financial Institutions Examination Council. (2011). Home Mortgage Disclosure Act & Community Reinvestment Act Census Data.

## COST BURDEN

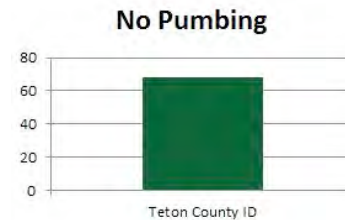
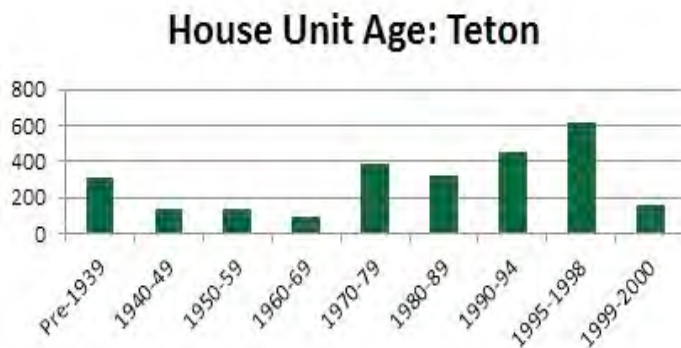
The cost burden for Teton County is broken down into two separate groups: home owners and renters. Housing Units that are considered vacant or only used part time are not included in the analysis of cost burden. The information given below is provided by the census bureau. The majority of home owners making less than 75K annually pay more than 30% per year. Not including the extra transportation expenses for many residents working out of the county .



There are a significant number of Teton County ID residents spending more than 30% of their income on rent using a standard calculation from the census bureau. However, the issue becomes even more pressing when the Brookings Affordability Index is taken into consideration with the counties transportation profile.



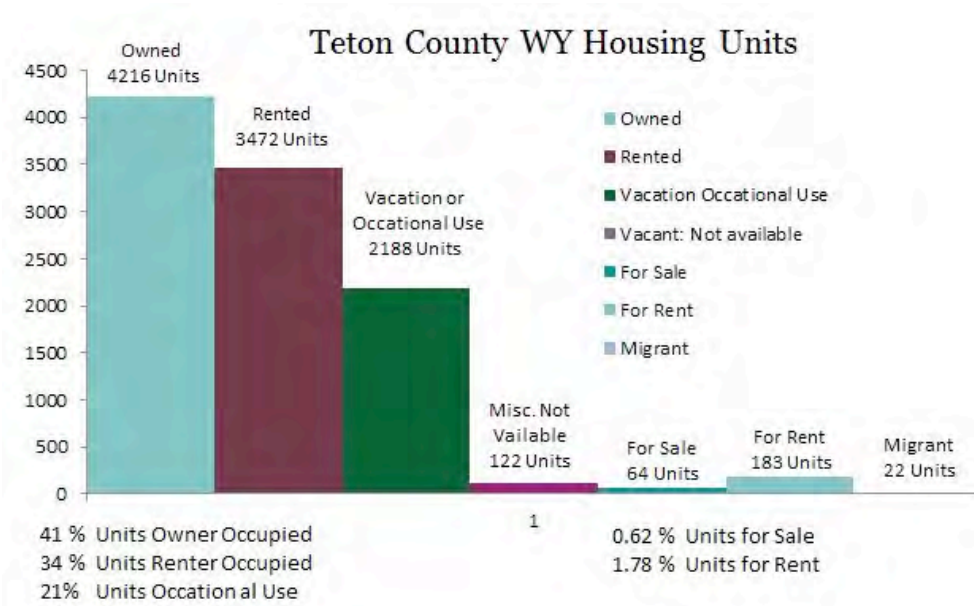
**ISSUES: AGE AND PLUMBING**



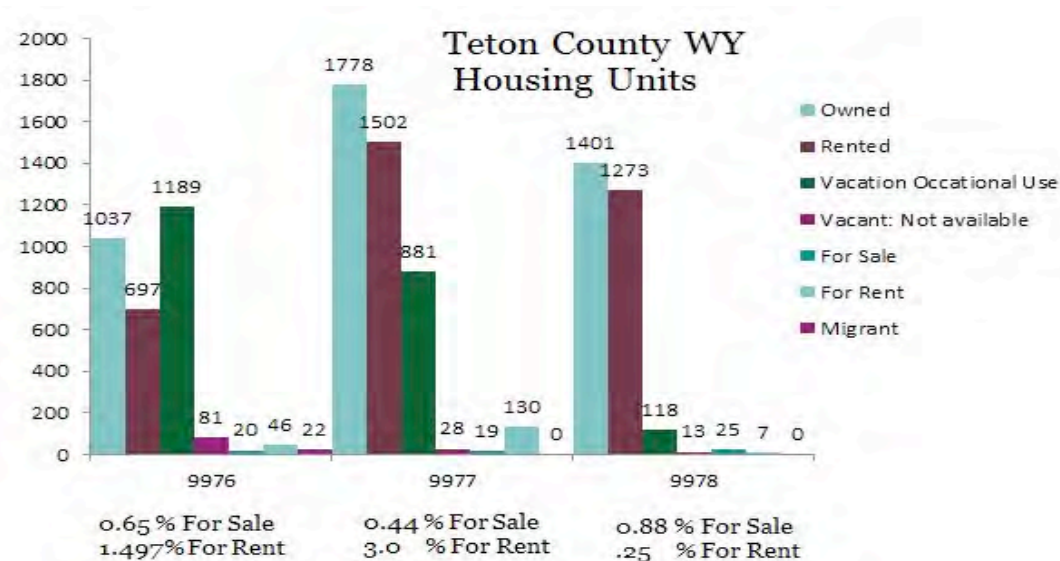
Federal Financial Institutions Examination Council. (2011). Home Mortgage Disclosure Act & Community Reinvestment Act Census Data.

## HOUSING UNITS: TETON COUNTY WYOMING

Teton County WY has a 96% occupancy rate: including 2188 part time units. There are a total of 183 units available for rent and 64 units for sale.



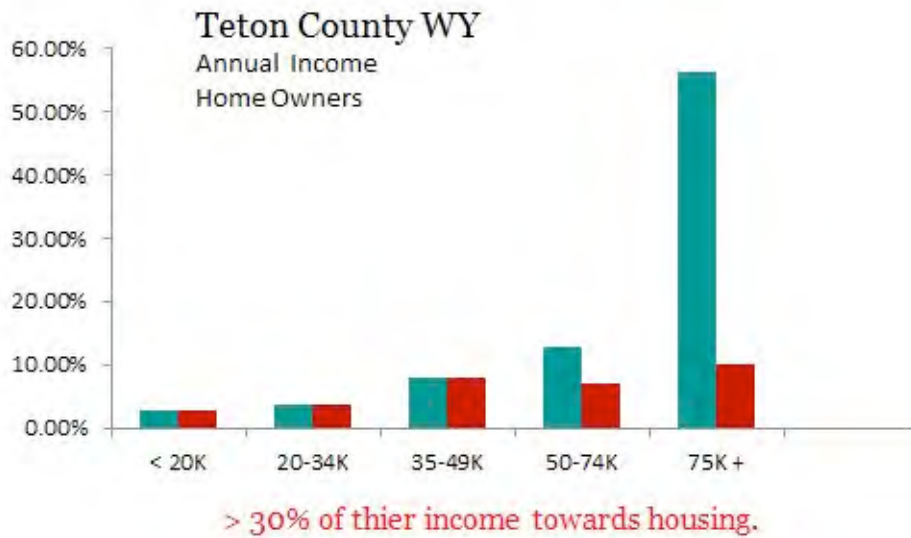
Within Teton County WY there are three tracts that the FFEIC collects census data on. There are 1189 part time occupancy units in tract 9976: outnumbering both owner occupied and rental housing units. This tract is unique in the WGYA region.



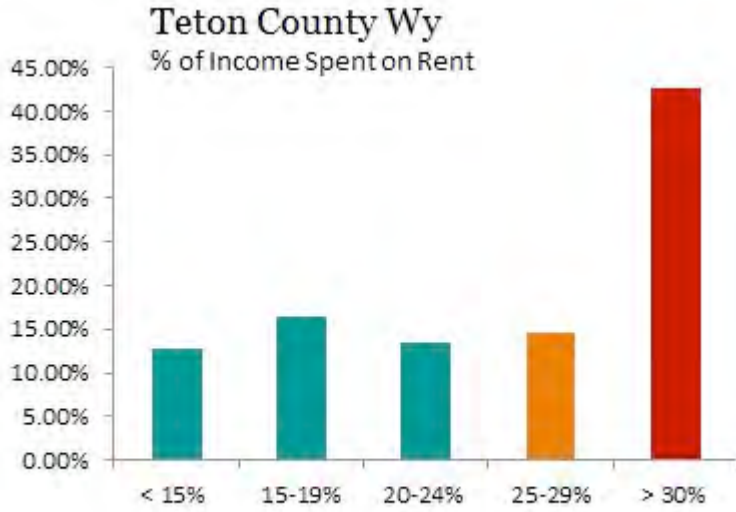
### COST BURDEN

The cost burden for Teton County WY is broken down into two separate groups: home owners and renters. Housing Units that are considered vacant or only used part time are not included in the analysis of cost burden. The information given below is provided by the census bureau.

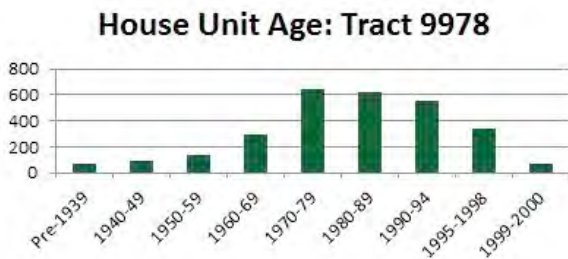
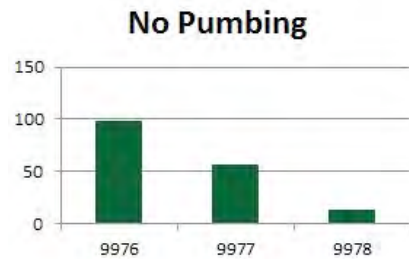
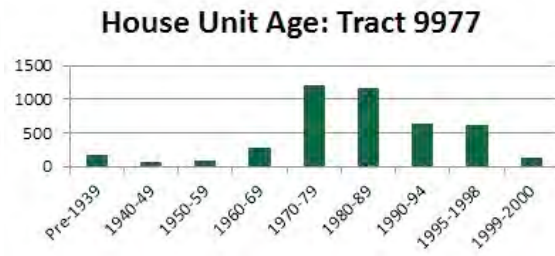
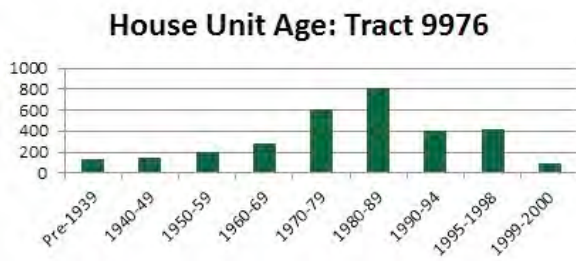
The majority of households with less than 75K annual income are paying more than 30% of their income on mortgage costs.



Over 40% of renters in Teton County WY spend over 30% of household income on housing costs.



## HOUSING ISSUES: AGE AND PLUMBING



Federal Financial Institutions Examination Council. (2011). Home Mortgage Disclosure Act & Community Reinvestment Act Census Data.

## FAIR HOUSING ORGANIZATIONS

U.S. Department of Housing and Urban Development

### FAIR HOUSING ASSISTANCE PROGRAM

“The Fair Housing Assistance Program strengthens nationwide fair housing efforts by helping individual State and local governments administer laws of their own that are consistent with the Federal Fair Housing Act.”<sup>19</sup>

### FAIR HOUSING INITIATIVE PROGRAM

“The Fair Housing Initiatives Program provides funding to public and private organizations that develop programs that are designed to prevent or eliminate discriminatory housing practices. Below is a list of the available grant opportunities.

- Private Enforcement Initiative Grant (PEI)
- Fair Housing Organization Initiative Grant (FHOI)
- Education And Outreach Initiative Grant (EOI)

### IDAHO HOUSING

Idaho Housing receives grant money from HUD to “support a comprehensive and coordinated statewide housing approach for emergency shelter, transitional housing, and permanent housing opportunities for low-income Idahoans. Grant opportunities are identified, prepared, and administered by Idaho Housing to expand safe, decent, and affordable housing around the state.”<sup>20</sup> Idaho housing administers a multitude of program throughout the state of Idaho.

### EASTERN IDAHO COMMUNITY ACTION PARTNERSHIP

Eastern Idaho Community Action Partnership (EICAP) helps serve at-risk individuals and families in the communities of Eastern Idaho. EICAP offers support and educational services needed to guide people from living lives of dependence and need to enjoy a life of possibilities through self-sufficiency.

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<sup>19</sup>

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_e\\_qual\\_opp/partners](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_e_qual_opp/partners) accessed Nov 22.

<sup>20</sup> Idaho Housing and Finance Association website. [www.idahohousing.com](http://www.idahohousing.com)  
Access date Nov 22, 2012

(Eastern Idaho Community Action Partnership, 2012) They offer many programs to people in need, including low cost housing.

EICAP currently owns and manages nine properties in the Eastern Idaho area. Five of the properties are designated as family housing and the others are senior housing. The senior housing is available for persons who are 62 or over or handicapped or disabled and who meet income and tenant selection criteria. (Eastern Idaho Community Action Partnership, 2012)

#### HOUSING COMMUNITY FACILITIES PROGRAM

As a part of USDA Rural Development, housing and community facilities programs are offered to help rural communities and individuals by providing loans and grants for housing and community facilities. HCFP provides funding for single family homes, apartments for low-income persons or the elderly, housing for farm laborers, childcare centers, fire and police stations, hospitals, libraries, nursing homes, schools, and more. (United States Department of Agriculture Rural Development, 2012)

HCFP partners with non-profits, Indian tribes, state and federal government agencies, and local communities to create packages of technical assistance and loan an grant funds to assist more rural communities and individuals

#### TETON COUNTY (IDAHO) HOUSING COMMISSION

The 2007 Housing Needs Assessment completed by BBC for Teton County included a recommendation for a public housing authority. Funding was provided to complete the housing assessment and to establish a county housing commission. Not long after the commission was formed, the housing bubble popped and real estate values were adversely affected resulting in the commission being decommissioned. No programs, policies, or projects were established due to the short nature of the commission's life.

#### TETON COUNTY (WYOMING) HOUSING AUTHORITY

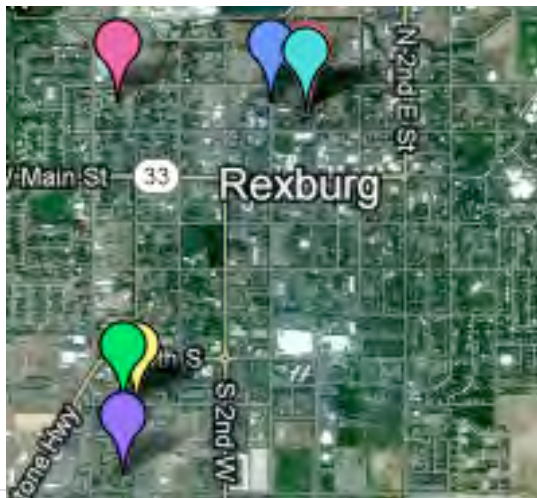
The mission statement of Teton County Housing Authority is to “enable diverse opportunities for essential housing throughout the county. The Authority shall provide education to the community, facilitate potential solutions, develop housing where necessary, and create multiple layers of partnership, all of which are designed to create housing essential to the future viability of the community.”

The Teton County Housing Authority created the Housing Authority Guidelines to provide comprehensive and consistent provision for the Housing Units created by the Teton County Housing Authority. There are three parts of the general policies and each part contains six to eight sections that describe a clear, fair and consistent administration of the House Programs to which they applied. Each Housing Program described in these Guidelines is evaluated on three levels to determine the requirements of occupants and purchase of the Housing Unit. The three levels of evaluation are herein referred to as Qualification, Eligibility and Preference. The TCHA has adopted the following HUD fair housing rates, which are prominently displayed online

**MADISON COUNTY**

In Madison Country there are six subsidized housing complexes all located in Rexburg.

Table I.3 Madison County Housing Programs							
Complex	Program	Units	Waiting List	Acceptance Process	Laundry	Play Yard	Connection
Madison Park	Rural Development	64	6-9 months	Eligibility (income, household size), contact potential applicants, background check	Onsite (2)	Yes	Wagon Wheel (separate applications)
Rexburg Plaza							
Twin Pines	Market Rate, Section 236, Section 8	8	6 months	Eligibility (income, household size), contact potential applicants, background check, relist one time	Yes	Yes	Eastern Idaho Community Action Partnership (EICAP)
Wagon Wheel	Rural Development	32	7-12 months	Eligibility (income, household size), contact potential applicants every 3 months, background check	Yes	Yes (2)	Madison Park (separate applications)
West Tisbury Village							
Community Gardens	Elderly /Disabled						



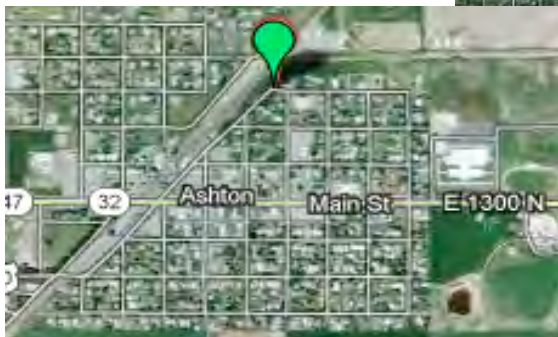
- Madison Park  
Rexburg, ID 83440
- Rexburg Plaze  
Rexburg, ID 83440
- Twin Pines  
Rexburg, ID 83440
- Wagon Wheel  
Rexburg, ID 83440
- West Tisbury  
Rexburg, ID 83440
- Village Community Gardens  
Rexburg, ID 83440

**FREMONT COUNTY**

There are a total four subsidized and senior housing complexes in Fremont Country. Two of the three subsidized housing complexes are in Saint Anthony and one is in Ashton. The one elderly and disabled property in Fremont Country is located in Saint Anthony.

Fremont County Housing Programs		
City	Complex	Program
Saint Anthony	Parkview Apartments	Rural Development
Saint Anthony	Pondside Gardens	Rural Development
Saint Anthony	South Fremont Senior Housing	Elderly/Disabled
Ashton	Village Gardens	Rural Development

-  **Parkview Apartments**  
St Anthony, ID 83445
-  **Pondside Gardens**  
St Anthony, ID 83445
-  **South Fremont Senior Housing**  
St Anthony, ID 83445



-  **Village Gardens**  
Ashton, ID 83420

## ACCESS TO FREMONT HOUSING RESOURCES

Many of the subsidized and elderly and disabled housing complexes in Fremont County require potential tenants to drive to the property location to fill out application or get any questions answered regarding rental options. They have the option to leave a message to set up an appointment in person, but only at the property. This leaves the challenge for individuals to find transportation to get them to the property in order to get any help or information about the complex.

Out of the three subsidized housing complexes in Saint Anthony, two of them are close to downtown but the other is on the far outskirts of town. The location of that one far property makes it hard for individuals to access stores, medical facilities, and other important destinations.

## COMPLAINT AND COMPLIANCE REVIEW

### FAIR HOUSING ACTS

In 1968 the Federal Fair Housing Act was passed, then later amended in 1988 (the Fair Housing Amendments Act). The acts prohibit discrimination in housing on the basis of race, color, national origin, religion, gender, familial status or disability. Everything from home sales, mortgages, housing, home improvement lending, land use and zoning are included in the act. There are also some requirements for accessibility for new construction that will be occupied for the first time on or after March 31, 1991. There are a few exceptions: housing for older people, private clubs that limit access to club members, owner occupied units with less than four units, single family housing rented or sold without using a real estate agent or broker.

### IDAHO FAIR HOUSING LAW

Idaho housing laws are enforced through the Idaho Human Rights Commission. Grievances are made through the toll free 2-1-1 Idaho Care Line for information and referral options, or by contacting one of the following agencies:

- Idaho Legal Aid
- HUD's Office of Fair Housing Opportunity (FHEO)
- Idaho Housing and Finance Association (IHFA)
- Intermountain Fair Housing Council (IFHC)

There are two primary differences in the Idaho fair housing law than from the national Fair housing act. 1) It does not recognize familial status as a protected class. 2) It applies to providers with two or more units or properties.

### AMERICAN'S DISABILITY ACT

The American’s Disability Act (ADA) of 1990 was amended in 2008. Title III of the act states public accommodations must comply with basic nondiscrimination requirements that prohibit exclusion, segregation, or unequal treatment. They must also comply with reasonable modifications to policies, remove barriers in existing buildings, and comply with specific requirements for new and altered buildings. Specific public accommodations mentioned in the ADA that are included as a fair housing issue are homeless shelters and facilities rented by governmental agencies to provide government services.

## RIGHT TO FARM ACTS

The content of “Right to Farm Acts” varies from state to state. It is more common to have research from the evaluation of the “Right to Farm Act” and fair housing issues addressed in rural farming communities in New York State<sup>21</sup>, Pennsylvania<sup>22</sup>, and New Hampshire<sup>23</sup>. Specific issues that come into play are the high prevalence of ethnic groups that are employed as farm labor. Transportation issues to and from farm is often a challenge due to the remote location of the work site and the long days that are common. The answer, historically, was the common practice of providing employee housing on site. Zoning regulations that restrict traditional agricultural practices have been characterized as potentially exclusionary zoning in other states.<sup>24</sup> Regional ordinances and zoning related to the practice of requiring large lots for agricultural areas that prohibit or restrict the use of housing for farm labor should be should be evaluated for the following possible impediments:

- Restricts the availability of fair housing
- Limits the availability of housing choice
- Restricts access to opportunity

Idaho enacted a “Right to Farm” act effective July 1, 2011. It does not address the areas of farm labor housing.

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<sup>21</sup> Local Laws and Agricultural Districts, Patrick Hooker (New York State Dept. of Agriculture and Markets) Andrew M Cuomo (Governor New York), New York Department of State, January 2008.

<sup>22</sup> 2011 AAFA & NAREA Joint Annual Meeting, Pittsburg, Pennsylvania July 24-26 2011.

<sup>23</sup> Innovative Land Use Planning Techniques: A Handbook for Sustainable Development, New Hampshire Government Publications Dept. of Agriculture. Section 1.7 pages 105-115

<sup>24</sup> Rudel, T., O'Neil, K., McDermott, M., & Gottlieb, P. D. (2011 Joint Conference ). *Is Agricultural Zoning Exclusionary*. Rutgers University, Agriculture & Applied Economics Association: Pennsylvania. Pittsburg Pennsylvania: Northeastern Agricultural and Resource Economics Association

### Local Fair Housing Legal Cases and Studies

Each county within the WGYA was contacted with a request for information on any legal proceedings in regards to fair housing issues. Teton County was the only county to return any requests for information, and they reported zero incidences of fair housing complaints (Mary Lou Hansen, Teton County Clerk, reported this information on November 16, 2012)

There was one legal case filed in Madison County in November of 1997. Marvin A. Gardner placed an ad in the Rexburg Standard-Journal advertising for tenants. The ad included information that children would not be permitted. Representatives of the Idaho Fair Housing Council were contacted and two “testers” telephoned the number that Mr. Gardner had listed. Each “tester” was informed that no children would be allowed in the property.

On March 13, 1998 the director of the Idaho Fair Housing council filed a complaint against Mr. Gardener with HUD. The courts ruled that Marvin A. Gardner was in fact violating Fair Housing practices because he was discriminating against familial status. The Idaho Fair Housing Council was awarded damages for injuries caused by Defendant Marvin A. Gardner.

The Idaho AI, (Figure I-3 page Section 1, page 5) shows three known cases in Madison County that occurred between the years of January 2006 and October 2009. No additional information is provided. Efforts to locate the three complaints were unsuccessful.

## FAIR HOUSING PRIVATE SECTOR

### LENDING PRACTICES

The Home Mortgage Disclosure Act (HMDA) that requires financial institutions to provide lending data that includes the location and dollar amount of reporting lender’s loans by census tract. The data also contain racial and ethnic information for borrowers. However, data is only gathered and available for Metropolitan Statistical Areas (MSAs). The WGYA is not categorized as an MSA. No mortgage data is available for analysis at this time.

### REAL ESTATE FAIR HOUSING TRAINING

The Continuing Education Core Class mandated for Idaho real estate licensees every two years for renewal include updates on Fair Housing laws. No

additional training is provided in the region. During conversations to ascertain what training is offered regional, multiple real estate agents expressed their surprise at an AI study being conducted. There is a common misconception that a decrease in housing prices when the housing bubble broke and the availability of undeveloped lots and unsold housing units indicates that that housing is fair and affordable.

Training is provided for real estate professionals to comply with fair housing regulations. However, there is no information provided on what criteria is used to determine if a housing profile for a community provides fair housing choice, or on exclusionary versus inclusionary zoning practices. Outside of complying with the laws that directly impact how real estate can be sold there is little additional training or information easily available.

Currently Teton County Idaho and Teton County Wyoming do not participate in the same real estate boards as Fremont and Madison County. This is an area of concern as the state laws governing's fair housing in Idaho and Wyoming are different at the state level. Fair Housing training varies in approach and at times content based on the governing real estate board.

### SUBDIVISIONS: CC&Rs

Subdivision developments in the region almost always include some type of limitations on how the property can be used. These limitations are included on transfer deeds as “covenants, conditions, and restrictions (CC&Rs).” Each development has unique self-imposed regulations that may have an impact on fair housing. Local restrictions that are intentionally or unintentionally exclusionary can offset the impact of fair housing efforts in a community.

Many of the CC&Rs in the region reflect the zoning regulations at the county level. In order to avoid a duplication of information those areas that are directly impacted by County Regulations will be listed in the Public Housing Section. However individual practices that go beyond the county requirements will be listed in this section.

Local subdivision regulations are a major tool used by county and city governments to manage and shape the housing development process. Within those plans or site plans regulations are established to meet infrastructure needs, before they are approved by the county or city for development.

“Subdivision regulations are intended to ensure that proposed housing developments are cost-effective, meet health and safety requirements, are

properly designed.... The cost of these requirements represents a significant share of the cost of producing new housing...

“Subdivision requirements can reasonably be considered “regulatory barriers” to affordable housing if the ... requirements are greater (and hence, more costly) than those necessary to achieve health and safety requirements in the community.” Excessive regulations are potentially major contributors in raising the cost of housing and limiting the supply of affordable housing in communities.<sup>25 26</sup>

HUD, in order to measure excessive restrictions, commissioned experts to create benchmark subdivision standards. There are two sets of benchmark standards one for more dense developments and the second set for less dense developments. The study concluded the following:

Regulations that required a larger lots size than the recommended bench mark accounted for 65% of excessive housing costs. Adding \$5,596 to the median cost.

Although only 8% of regulations included a minimum house size, these regulations accounted for 17% of additional the costs

The median increase in lot size for a single family home is \$16, 425 for areas impacted by the regulations.

Lot widths, front setbacks, and sidewalk requirements above the bench mark contributed \$3,871 median increase.

The open space requirement couldn't be estimated in the study due to considerable variations. However, the recommended open space bench mark (including recreational purposes) is less than 13% which is substantially less than what is required by regional county zoning.<sup>27</sup>

Additional CC&R standards common in the region that weren't taken into account in the study include:

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<sup>26</sup> Glaeser, E., & Gyourko, J. (FRBNY Economic Policy Review 2003). *Impact of Building Restictions on Housing Affordability*. Federal Reserve Bank of New York, Economic Policy.

<sup>27</sup> NAHB Research Center . (April 2007). *Study of Subdivision Requiements as a Reglatory Barrier*. Washington, DC: Office of Policy Development and Research: US Dept. of Housing and Urban Renewal .

- Minimum number of exterior corners greater than 4. A square or rectangular home is the most cost efficient to build, requirements for exterior corners greater than 4 increase building costs. Some developments require as many as eight exterior corners.
- Other design requirements unrelated to safety such as garages, regulation of building materials, landscaping requirements, etc...
- Regulation of accessory housing units.

### DISCRIMINATION IN RENTAL ADVERTISING

Discriminatory advertising for rental properties can be used to determine housing discrimination in the rental markets. It is illegal to directly or indirectly prohibit rental, sale, lease, or sublease based on race, sex, disability, familial status, national origin, color, or religion<sup>28</sup> Individuals, however, are able to advertise they prefer a male or female if they live at the residence. One other exception for housing designated for seniors is that it is not illegal to advertise a certain age for the potential tenant if the housing is designated specifically for senior citizens.

To determine discriminatory action in advertising for rental housing, advertisements were obtained from Craigslist, Rexburg Standard Journal, and Teton Valley News. Research was conducted on the city level of each of the following counties: Fremont, Teton, and Madison County.

The 223 advertisements posted for during the week of October 22 through October 26, 2012, were reviewed for discriminatory phrasing. Out of the 223 postings, 212 advertisements were for apartments and homes and 11 advertisements were for rooms and shared living quarters. The detailed tally by type and county is listed below.

	Rental Advertisements			
	Fremont	Teton	Madison	
Apartment/Housing	39	53	120	212
Room/Shared	0	1	10	11
Total				223

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<sup>28</sup> Idaho Legal Aid Services, Inc. (2011, October 12). *Fair Lending/Fair Housing Legal Advice Line*. Retrieved November 21, 2012, from Idaho Legal Aid: [http://idaholegalaid.org/Fair\\_Housing\\_Advice\\_Line](http://idaholegalaid.org/Fair_Housing_Advice_Line)

No examples of gender preference, racial preference, age preference, familial status, or disability related discrimination were found in advertisements within the region.

## Fair Housing Public Sector

“The ability of private real estate markets to meet affordable housing needs is strongly affected by zoning, subdivision, and land development regulations adopted by local governments. Local regulations that are intentionally or unintentionally exclusionary can offset the impact of affordable housing...”<sup>29</sup>

“The cost of these requirements represents a significant share of the cost of producing new housing. Such requirements can reasonably be considered regulatory barriers to affordable housing if the locally determined requirements are greater, more costly, than those necessary to achieve healthy and safety requirements in the community”<sup>30</sup>

A national wide study was commissioned by HUD to establish a set of planning guidelines for sustainable communities, known as bench marks. The results of which have been strengthened by independent subsequent reports. Findings from this study used the following criteria in determining what is considered more or less dense:

More dense- Metropolitan Statistical Area (MSA) or communities/developments that have a median lot size of 0.16 of an acre.

Less dense - Non-Metropolitan Statistical Areas (non-MSA) or communities / developments that have a median lot size of 0.5 of an acre.

There are six objectives that were taken into consideration with the development of these recommendations.

- Promote equitable, affordable housing
- Support existing communities
- Enhance economic competitiveness
- Provide more transportation choices
- Coordinate and leverage federal policies and investment
- Value communities and neighborhoods <sup>31</sup>

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<sup>29</sup> Idaho Cities AI Info Section VII, p11 of 2011

<sup>30</sup> Study of Subdivision Requirements as a Regulatory Barrier, U.S. Department of Housing and Urban Development, Office of Policy and Research, April 2007

<sup>31</sup> (NAHB Research Center , April 2007)

## SUBDIVISION ZONING, ORDINANCES, AND REGULATIONS

Local subdivision regulations are a major tool that is used by county and city governments to manage and shape the housing development process. Within those plans or site plans, regulations are established to meet infrastructure needs before they are approved by the county or city for development.

“Subdivision regulations are intended to ensure that proposed housing developments are cost-effective, meet health and safety requirements, are properly designed.... The cost of these requirements represents a significant share of the cost of producing new housing... <sup>32</sup>

Subdivision requirements can reasonably be considered “regulatory barriers” to affordable housing if the ... requirements are greater (and hence, more costly) than those necessary to achieve health and safety requirements in the community.” Excessive regulations are potential major contributor in raising the cost of housing and limiting the supply of affordable housing in communities. <sup>33</sup>

HUD, in order to measure excessive restrictions, commissioned experts to create benchmark subdivision standards. There are two sets of benchmark standards one for more dense developments and the second set for less dense developments. The study concluded the following:

Regulations that required a larger lots size than the recommended bench mark accounted for 65% of excessive housing costs. Adding \$5,596 to the median cost.

Despite only 8% of regulations including a minimum house size, this type of regulation accounted for 17% of additional costs

The median increase for lot size for a single family home is \$16, 425 for those areas impacted by the regulations.

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<sup>32</sup> Study of Subdivision Requirements as a Regulatory Barrier, U.S. Department of Housing and Urban Development, Office of Policy and Research, April 2007

<sup>33</sup> Study of Subdivision Requirements as a Regulatory Barrier, U.S. Department of Housing and Urban Development, Office of Policy and Research, April 2007

Lot widths, front setbacks, and sidewalk requirements above the bench mark contributed \$3,871 median increase.<sup>34</sup>

The cost open space requirement was not able to be financially estimated in the study due to considerable variations in how counties require open space to be measured. The larger the requirement of open space in relation to the quantity of housing units developed the more adverse the impact on affordable housing. This is primarily due to the impact of land development costs being a driving factor in housing affordability.

County open space requirements were converted to a ratio of number of square feet per housing unit for comparative purposes in the study. The recommended open space bench mark (including recreational purposes) is slightly less than 13% for less dense areas. This is substantially less than what is required by County Comprehensive Plans in the region that range up to 70-80% required open spaces for developments.<sup>35</sup>

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<sup>34</sup> Study of Subdivision Requirements as a Regulatory Barrier, U.S. Department of Housing and Urban Development, Office of Policy and Research, April 2007

<sup>35</sup> Study of Subdivision Requirements as a Regulatory Barrier, U.S. Department of Housing and Urban Development, Office of Policy and Research, April 2007

HUD Bench Mark Standards		
Land Development Standard	Less Dense Developments	More Dense Developments
Lot Size (feet) <sup>2</sup>	9411	4250
Lot Widths	54	39
Floor Area (feet) <sup>2</sup>	1481	981
Setbacks		
Front	19	13
Side	8	5
Rear	21	16
Paved Roadway (feet)		
On-street parking allowed 1 side	23	24
On-street parking allowed 2 sides	28	27
Width of Planting Strip		
Sidewalk width	3.93	3.94
# of parking places: off street		
Covered Parking Requirement	1.5	1.5
Requirement	NO	NO
Open Space Requirement		
	11.5%	12.9%

In addition to the benchmarks established by HUD there are a set of best practices commonly recommended for communities nationwide.

Local regulations, ordinances, and zoning requirements are created in an effort to effectively management the growth within a community in a way that does not create a burden on the existing resources. Usually, in a response to a period of unmanaged growth that taxed the basic infrastructure. Development is slowed by the creation of processes for approval, in effect creating an artificial bottleneck to allow the community time to respond to growth. Zoning and Ordinances have the effect of limiting the supply of available land for use in the development process.

When effective planning is used a balance is achieved that provides the community time to ensure the existing system adapts to growth and provides a wide variety of housing choices, locations, and price ranges. This balance contributes to a healthy local economy and community. When regulations or processes are too restrictive the results can be a lack of affordable housing and exclusion to fair housing choice.<sup>36</sup>

Each county within the region has components within their governing comprehensive plans, ordinances, and policies that can be improved to be more in line with national bench mark standards for sustainable communities. The most common areas that can be improved upon: minimum size of lots, minimum lot widths, set back requirements, off street parking requirements, open space requirements.<sup>37</sup>

### GROWTH MANAGEMENT EXCEPTIONS AND INCENTIVES

One of the most effective methods to encourage the availability of affordable housing is to create a local system that allows exceptions to practices, policies, and regulations put into place to manage growth. The waiver of fees, increases in density, a streamlined approval process and tax credits, are just a few examples of exceptions that are applicable.<sup>38</sup>

A modified set of regulations, ordinances, and zoning criteria can also be developed to encourage the investment in affordable housing. These guidelines may only apply to housing developments or individual units that met the criteria of being classified as affordable housing or near underserved employment centers. A fair and affordable housing plan would need to put into place and updated regularly in order to fully utilize this method<sup>39</sup>

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<sup>36</sup> American Planning Association. (2006). *Policy Guide on Housing: Specific Policy Positions*. Legislative and Policy Committee .

<sup>37</sup> BBC Research & Consulting. (May 2012). *2011 Analysis of Impediment to Fair Housing Choice*. Idaho House and Finance Association, Idaho Department of Commerce, State of Idaho , Denver Colorado .

<sup>38</sup> I BBC Research & Consulting. (May 2012). *2011 Analysis of Impediment to Fair Housing Choice*. Idaho House and Finance Association, Idaho Department of Commerce, State of Idaho , Denver Colorado .

<sup>39</sup> I BBC Research & Consulting. (May 2012). *2011 Analysis of Impediment to Fair Housing Choice*. Idaho House and Finance Association, Idaho Department of Commerce, State of Idaho , Denver Colorado .

None of the counties in the WGYA have made exceptions and incentives available for affordable housing. This should be used in particular in Teton County ID and Teton County WY given the high cost of housing.<sup>40</sup>

## MULTI-HOUSEHOLD UNITS

One of the key factors in evaluating fair housing is the mix of housing in the community. There should be a variety of housing types such as single family attached and detached units, duplexes, structures with varying numbers of housing units provided as a choice. Building costs for multi-family units can be more expensive due to increased regulations. In communities that do not have a mix of housing options regulations may not be friendly to the development of cost effective multi-household units. Indicators of these jurisdictions are as follows:

- High median home prices; compared to the region and to the median household income. Housing prices should be approximately 2.5 to 3 times that of median incomes or be comparable to other median housing costs in the region.
- Low percentage of multi-family units compared to the total units Multi-family units should grow at rates comparable to other housing types.
- Low average zoned density based compared to the region
- Few acres zoned for high-density use: 12 units per acre +

Additional factors that can be negatively impacting the use of multi-household units in the housing mix:

- If adequate density is available, and adequate zoned areas that allow multi-household units are available, then the location of where development is allowed should be evaluated.
- Adequate building height for multi-family structures is a minimum of 35 feet; current ordinances in most counties cap the height at 30 feet.
- A complicated regulatory process or excessive fees for development.<sup>41</sup>

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<sup>40</sup> I BBC Research & Consulting. (May 2012). *2011 Analysis of Impediment to Fair Housing Choice*. Idaho House and Finance Association, Idaho Department of Commerce, State of Idaho , Denver Colorado .

<sup>41</sup> American Planning Association . (July 2007 ). *Zoning as a Barrier to Multifamily Housing Development, Report #548* . Maryland: Planning Advisory Service.

Although Multi-Household Units are allowed in all four counties, not all of the ordinances are friendly to the development of those housing types. Teton County Idaho fits into all indicators for a jurisdiction that many not be friendly to multi-household units. No building permits have been issued for Teton ID since before 2007.

### ACCESSORY DWELLING UNITS

Accessory Dwelling Units are a very effective tool that can be used to provide fair housing in a community. ADUs have the following strengths:

- Each ADU can reduce the cost burden to two households 1) The household living in the unit 2) as a financial resource to the primary household.
- Can be used as a Care Taker Resources to provide assistance to the elderly, the disabled, or families with children.
- Reduced impact on the existing infrastructure compared to new units.
- Serve as a safety net for low income households, or those with special needs that have the highest risk for homelessness
- ADUs facilitate efficient use of existing housing stock.
- Offers an alternative to major zoning changes
- Provides affordable housing options for young adults just entering the work force, or for empty nesters wanting to scale down.
- Blend in with existing architecture maintaining community character.<sup>42</sup>

Dwelling units ADUs are generally allowed in most of the region. However, there are several requirements that impacted the effectiveness of units in the housing profile. Regional ordinances limit the use of ADUs and add additional costs in the following ways:

- Not allowing apartment ADU's
- Only allowed on lots size greater than an Acre
- Two off street parking spaces are required.
- Cannot be a manufactured home due to two concurrent restrictions 1) the AUD must match the main home in appearance 2) Any lot with 2 or more manufactured homes on the same lot must get approval as manufactured home park<sup>43</sup>

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<sup>42</sup> American Planning Association. (2006). *Policy Guide on Housing: Specific Policy Positions*. Legislative and Policy Committee .

<sup>43</sup> County, T. (2012 ). *Teton County Comprehensive Plan 2012*.

- Units attached to a primary housing unit are not considered to be Accessory Dwelling Units if they are intended for two households. In this situation they are considered “Dwelling, Two Family” and are restricted much more heavily than either ADUs or Multi-Family Dwellings.<sup>44</sup>
- Motor Homes, Trailer Coaches, and similar mobile or temporary structures cannot be used as dwelling units.<sup>45</sup>
- Buildings originally built for other purposes cannot be repurposed as Dwelling Units.<sup>46</sup>

In order for ADU’s to be successful in community programs should be created to encourage use. Above all else an effective ADU program should be flexible, uncomplicated, include fiscal incentives, and be supported by a public education program to increase program support.<sup>47</sup>

### OCCUPANCY STANDARDS

Occupancy Standards that reduce housing choice based on benefits that are not directly tied to health or safety can negatively impact the community housing profile by limiting diversity unnecessarily. Innovative housing options create more housing opportunities for low-income households, elderly, disabled, and those with special needs. A narrow housing profile makes it harder for those classes to find housing that meet their needs.<sup>48</sup>

Under-utilized housing options in the region include: shared residences, single room occupancy developments, accessory apartments, boarding houses, repurposed existing structures, and assisted living for independent residents who require minimal supervision, care take units.

Fremont and Madison counties do have provisions for caretakers and limited assisted living that are not dependent on geographic location in the county.

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<sup>44</sup> County, T. (2012 ). *Teton County Comprehensive Plan 2012*.

<sup>45</sup> County, T. (2012 ). *Teton County Comprehensive Plan 2012*.

<sup>46</sup> County, T. (2012 ). *Teton County Comprehensive Plan 2012*.

<sup>47</sup> American Planning Association. (Adopted April 2006 ). *Policy Guide on Housing*. Legislative and Policy Committee, Chapter Delegate Assembly, Board of Directors.

<sup>48</sup> American Planning Association. (Adopted April 2006 ). *Policy Guide on Housing*. Legislative and Policy Committee, Chapter Delegate Assembly, Board of Directors.

Community policies, procedures, ordinances should encourage innovative housing options for diverse populations which in turn will foster sustainable development. <sup>49</sup>

Current standards in the region that may restrict innovative housing options include:

- No allowances for minor assisted living arrangements, care taker units, boarding houses, shared residences that could be utilized by the protected classes. These housing options could provide a means for individuals to continue living independent lives and result in decreased county investment into infrastructure to meet specialized housing needs.
- Lack of flexibility in allowing existing structures to be repurposed as a housing unit.
- Accessory Dwelling Units must be completely separate independent.
- Prohibiting of certain types of structures being used as dwelling units: RVs, hotels, dormitory rooms, rooming houses, hotels, development of single room housing units.

## ZONING PRACTICES AND ORDINANCES

Fair housing recommendations included in the Idaho AI include:

- 1) Decreasing the minimum lot size in Teton, Fremont, and Madison counties.
- 2) Decreasing the required off street parking requirements
- 3) Increasing densities' and height restrictions to allow for multiple housing developments

## LAND USE

Rural Idaho has traditionally had small rural mixed use communities sprinkled throughout the country side. Both Madison and Fremont County have incorporated village districts within their comprehensive plans that support the historical culture of the communities. These districts maintain affordability through flexibility. Allowing residents to live, work, and obtain basic necessities in the same area decreasing transportation cost and overall cost

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<sup>49</sup> American Planning Association. (Adopted April 2006 ). *Policy Guide on Housing*. Legislative and Policy Committee, Chapter Delegate Assembly, Board of Directors.

burden of living in the area. This approach preserves the rural character of the region while ensuring that residents have fair affordable housing choice.<sup>50</sup>

## AGRICULTURE

One of the primary challenges for the region is how to integrate the needs of agriculture with the needs of planned development communities. Despite the increase in non-farm occupations over recent years, agriculture still is a major contributor to the regional economy. One area that needs to be addressed for this region is way to make housing options for farms and agriculture workers more readily available. The use of village districts may be of some value in helping to meet those needs. However, being able to provide affordable on site housing is historically a necessary part of conducting day to day business on farms and ranches in the region.<sup>51</sup>

In the past, farmers and ranchers had a wide variety of options to obtain inexpensive labor for their family run agriculture business. One of the primary means they were able to meet this need was due to their ability to provide affordable on site housing for those working on the farm. It allowed laborers to live where they worked which is especially important due to the long hard work requirements involved in agriculture. Those that labor on the farms are often low income and previously relied on agricultural housing to subsidize their incomes.<sup>52</sup>

Increase zoning restrictions have resulted in an increased housing and transportation cost burden for households employed in agriculture. Without the

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<sup>50</sup> BBC Research & Consulting. (May 2012). *2011 Analysis of Impediment to Fair Housing Choice*. Idaho House and Finance Association, Idaho Department of Commerce, State of Idaho , Denver Colorado .

<sup>51</sup> BBC Research & Consulting. (May 2012). *2011 Analysis of Impediment to Fair Housing Choice*. Idaho House and Finance Association, Idaho Department of Commerce, State of Idaho , Denver Colorado .

<sup>52</sup> BBC Research & Consulting. (May 2012). *2011 Analysis of Impediment to Fair Housing Choice*. Idaho House and Finance Association, Idaho Department of Commerce, State of Idaho , Denver Colorado .

benefit of onsite affordable housing agricultural employment does not provide enough income to support a household above the poverty level.<sup>53</sup>

A variety of studies have been conducted to determine how best to meet the housing needs of agricultural laborers and planning development. There are many options that allow farm to have onsite housing options without adversely impacting the existing infrastructure. Common recommendations and practices include:

- Allowing current buildings to be repurposed for housing.
- Exempt agricultural housing from zoning regulations that are above the standards established for health and safety.
- Allowing agricultural housing to be built alongside existing roads and utilities, leaving the bulk of the land still available for farming and ranching. Allowing smaller lots to be broken off for the purpose of building affordable onsite housing.
- Creating a simplified approval process for the creation of neither agricultural housing that is not expensive nor time consuming.
- An agricultural housing exemption should only be provided to “working farms” that generate a portion of their income from agricultural efforts. This would not include income that is only gained from renting pasture land or income that requires no agricultural labor to be performed.
- Up-zoning agricultural ground zoned from 5 acres to 2.5 acres density ratio.

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Given the prominence of agriculture as a means of employment in the region, consideration should be given to creating a system that allows farmers to provide affordable housing to agricultural laborers. It would allow the use of ample private land resources to bare a portion of the cost of providing

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<sup>53</sup> Cumberland Coutry Offices . (n.d.). *Agricultural Preservation Zoning: Tri-County Region*. Commissioners Strategic Planning, Carlisle PA. Retrieved from <http://www.ccpa.net/DocumentCenter/Home/View/365>

<sup>54</sup> Department of Agriculture and Markets . (Print Date: Jan 2008 ). *Local Laws and Agricultural Districts: How do they relate?* New York State Department of State Division of Local Government , Department of Agriculture and Markets. Albany NewYork: James A Coon LoCal Government Technical Series.

<sup>55</sup> Center for Rural Pennsylvania. (2006). *Affordable Housing in Rural Pennsylvania*. A Legislative Agency for Pennsylvania General Assembly .

affordable housing. Reducing the stress on the existing fair housing infrastructure provided in the community.

## ACCESS TO OPPORTUNITY AND GOVERNMENT SERVICES

### MEDICAL CARE

Access to medical care for low income households in rural areas is a challenge due to a reduction in Medicaid and Medicare transportation benefits, and lack of a public transportation system. This is key point for Fremont County due to the concentration of disabled residents in all three census tracts (see Population Disability section for details).

It is also a challenge for residents in the Teton area. This community has a longer drive time to access health care than most of the other small communities. It is not served by the public transportation service that Driggs, Victor, Teton Village, and Jackson Hole has access to.

### FOOD STAMPS VENDORS

Tetonia does not have access to a vendor that had been approved by the FDA to accept food stamps. This is a key point for Teton County because of the concentration of Hispanic population and low income residents in the surrounding area. The nearest food stamp vendor is 18 miles away. Tetonia previously had a grocery store that went out of business, now the only source of groceries is a local convenience store. The convenience store has applied to be a provider but has been turned down due to size of inventory.<sup>56</sup>

According to the census, Hispanic households are less likely to have access to their own vehicles for transportation. Tetonia does not have access public transportation. TRPTA operates within Teton County, however it follows a limited route that runs from the Center of Driggs over the pass to Teton County WY. There is no public means of transportation North of Driggs.

### AFFORDABLE HOUSING LOCATION

A key point for the cities of Driggs, Rexburg, and St. Anthony is the location of fair housing and its distance from town centers. If resources are not accessible a potential barrier to opportunity or service could exist.

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<sup>56</sup> United States Department of Agriculture . (Accessed November 17, 2011).  
*Snap Retailer* .

#### FOOD STAMPS: JOB TRAINING EMPLOYMENT REQUIREMENTS

The current job training requirement can only be met by attending classes in Idaho Falls three times per week for an hour. There is no monetary assistance to cover the costs of transportation to the training site.

Participants are required to meet a minimum weekly quota of new job applications submitted. Small towns can also exhaust their potential employer base for applications in a short period of time.  
(Interview Dept. of Health & Welfare Oct 2012)

These two factors combined can create a potential barrier to accessing services for rural residents in need.

#### EMPLOYMENT SERVICES: JOB SERVICE

There are primarily two ways to access the services offered through Idaho Job services 1) travelling to the office located in Rexburg Idaho 2) Accessing the service online. For households that do not live in Rexburg, travelling out of county for job searches could be potential barrier to employment. However, for households that are able to access the same services online no barrier would exist.

At this time, there is no regional data or studies available to determine if there is a potential barrier to Internet Service. It is complicated by the fact, that the infrastructure has disparities that impact the cost. Provider availability varies based upon household location instead of by county and city.

Having access to affordable efficient internet service is critical in order to access the online resources. This may be an access issue for populations that do not have transportation or internet access.

#### ACCESS ONLINE PUBLIC SERVICES

As more public services are provided online as a means to distribute services to rural areas more efficiently, the need of residents to have access to affordable and equal internet options will become more pressing. Households that are not able to access online services may face inequalities to opportunity as a result.<sup>57</sup>

## Public Involvement

### PUBLIC SURVEY

Interviews were conducted with the general public to gain insight into community opinions and concerns. Questions focused mainly on whether any acts of discrimination occurred in the area in the last five years. If discrimination occurred, further questions were asked to determine what form of discrimination took place and who discriminated against them.

The main purpose of the survey was to determine whether the public had input on possible existing impediments to fair housing. Of the 101 respondents, only 5 were disabled. As far as race representation is concerned, 4 participants were non-Caucasian; 1 Asian, 1 African American, and 2 other (assumed Hispanic). Of all the respondents, 9 said they were affected by discrimination in some way in the past 5 years in regard to fair housing choice.

Of those that suffered from discrimination, 3 were discriminated against on account of their income level. Two of these events occurred in Fremont County, the other occurred in Madison. This didn't seem to have an association with gender, 1 victim was male and the other 2 were female.

Race was also a prominent cause for discrimination, being reported in three responses. One event took place in Fremont County and the other two racial events took place in Teton County WY. It's common to link this type of response to minorities, but only one of the three involved a minority, an African American; the other two victims reported being white.

Reasons for Discrimination	
Answer	Responses
Source of Income	3
Color	1
Religion	0
Age	1
National Origin	1
Gender	2
Race	3
Disability	0
Familial Status	0
Other	3
Total	14

Gender was recognized by 2 of the 9 responders as a basis of discrimination. Females doubled males as recipients of discrimination with six of the victims being female while only 3 victims were male. Although age wasn't a common response for cause of discrimination, every victim was less than 35 years old. This was split fairly evenly, with 5 being between 18 and 24 years old and the 4 being between 25 and 34 years old. A reason for this may be that younger people (especially college students) are more likely rent than to have their own homes.

Lack of education stuck out as the largest possible impediment identified by this survey. None of the respondents that suffered from discrimination reported the event. When asked why they weren't reported the most common response was that they didn't think it would make any difference (4). Other responses were that they didn't know where to report (3) and that they weren't sure of their rights (2). One thing is for certain, these inactions weren't a result of fear, when asked if they didn't report out of fear of retaliation, all of them answer no. These numbers strongly suggest the public lacks education concerning fair housing matters.

The lack of education may be associated with more than the victims. When they were asked who discriminated against them, 6 reported it being a landlord or property manager. As stated previously, none of the victim's feared retaliation in response to a complaint; meaning the animosity between the two parties wasn't extreme. This could imply that these landlords discriminated in ignorance, and that a lack of education and training may be causing housing impediments.

### STAKEHOLDER SURVEY

An additional evaluation of fair housing within the area was conducted through a survey of stakeholders. This enabled greater insight into knowledge, experience, opinions and feelings of stakeholders. It also gauged the ability of informed and interested parties to understand and affirmatively further fair housing. 23 stakeholders were solicited to take the survey through phone and email.

The 23 stakeholders interviewed represented 22 different industry classifications. In their professional opinions, employment issues (such as low wages, unemployment, or lack of job training opportunities) were the area of greatest concern in regard to fair housing (11). The other notable issue in fair housing concerned the lack of affordable housing (9). While expounding on this issue several were concerned zoning issues may be causing an impediment in the area.

When asked which individuals were most underserved in terms of safe affordable housing, the most common response was low income persons and families (9). Persons with disabilities were ranked second (8). Minorities were one of the lowest groups picked (only 3).

On the surface there appears to be a gap in opinion between stakeholders and the public concerning. Data from stakeholders knowledgeable of impediments, however, would suggest otherwise. The proportion of stakeholders aware of

impediments was similar to responses in the public interviews (11%, the public had 9%). Looking closer at the public survey also solves the discrepancy in the race / minority gap. Of those that suffered from discrimination, only one respondent wasn't white. Apparently there are white persons being discriminated against because of their race.

There also appears to be a gap between the public survey and the stakeholder survey concerning those with disabilities. None of the disabled respondents had experienced discrimination in regard to fair housing, but stakeholders believed them to be a group most underserved. This could be from an awareness originating at the state level. "Based on complaints and lawsuits, persons with disabilities appear to have more difficulty finding housing because of discrimination and lack of accessibility. As part of their requirement to affirmatively further a fair housing choice, local governments must work to remove fair housing barriers faced by persons with disabilities—particularly noncompliance with design and accessibility provisions. These can be identified through building inspections.....State law does not mandate accessibility provisions in new construction."<sup>58</sup>

Another explanation for this gap could be the shortcomings of the public survey in accessing data from those with disabilities. Only 5 people with disabilities took part in the survey when the area's proportion of those with disabilities is well over 5%.

According to the two stakeholders that were actually aware of discrimination, one of them identified race as the basis for those actions (the other was source of income). This matches exactly with the public interviews, since those were the two highest causes of discrimination reported.

Entry level ownership housing was recognized as the form of housing that was most needed (9). Both rental housing and apartment housing ranked second for most needed (both with 5 stakeholders). Other categories had fairly low response rates.

The majority (13) of stakeholders interviewed were aware of where to go to get assistance with fair housing questions and concerns. However when asked to describe outreach and education in regard to affirmatively further fair housing, 11 said it was too little and the remaining 6 felt it was about right. None of them felt it was too much.

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<sup>58</sup> (Idaho AI, 2011)

## POSSIBLE IMPEDIMENTS

### FAIR HOUSING UNDERSTANDING

When random stake holders in the region were asked about fair housing issues a common response was: There are undeveloped lots in a community or housing units on the market that have not been sold yet. This same sentiment is expressed in two of the four county comprehensive plans.

Another comment when asked about affordability: housing is “relatively” affordable and fair in the area. When asked what the term “relatively” indicated, other metropolitan regions were being used as a point of reference in determining if local values are fair or affordable.

### VARYING DEFINITIONS OF COMMON TERM WITHIN THE WGYA REGION BY GOVERNING BODIES

Over time each county and city in the region has developed their own terminology used within their ordinances, procedures, zoning regulations, and comprehensive plans. The definitions vary greatly from one county to another, and at times even between the city and county level. These differences in meaning for commonly used terms could be a hindrance when creating a regional sustainability plan.

### REAL ESTATE PROFESSIONALS WITH THE REGION MAY RECEIVE VARYING TRAINING, GUIDANCE AND INFORMATION.

Teton County Idaho and Teton County Wyoming belong to the Jackson Hole Board of Realtors. Whereas Fremont and Madison County real estate agents belong to the Idaho Falls Board of Realtors. During the course of this study no attempt was made to determine if the practices are similar. However, one consideration that may be of concern is that the State of Idaho has Fair Housing Laws and resources that Wyoming does not.

### HUD BENCHMARK STANDARDS: COUNTY REGULATIONS AND ZONING

When compared with a national bench mark each of the counties has areas in which they can improve. The most common standards that exceed HUDS recommendations are:

- Requiring a minimum of 2 parking spaces

- Requiring larger minimum lot sizes
- Requiring larger minimum lot widths
- Open Space requirements over 13-20%

## HUD FAIR HOUSING RECOMMENDED PRACTICES

Stipulations that limit fair housing choice by prohibiting the occupation of structures that meet health and safety regulations have an adverse impact on fair housing choice. Strict occupancy regulations discourage housing innovation that would most benefit the protected classes and low income households.

Housing profiles that lack a healthy housing mix either by type, size, location, or affordability should be evaluated for potential regulation or process barriers. A high cost burden is another indicator that there may be an issue.

## TETON COUNTY ID HOUSING AUTHORITY DECOMMISSIONED

The housing authority board that was recommended for Teton County in a Housing Needs Assessment study in 2007 was commissioned but was decommissioned before it made progress. The 2007 study was funded by developers in the areas, who desired to create affordable housing options for future employees. One of the recommendations of the study was the need for a housing authority board. The developers in the area funded the board on behalf of the county. When the housing bubble popped in 2008, the promoters of the commission no longer felt it was needed, and the housing authority was decommissioned.

## ACCESS TO OPPORTUNITY AND SERVICES IMPEDIMENTS

### MEDICAL CARE

Access to medical care for low income households in rural areas is a challenge due to a reduction in Medicaid and Medicare transportation benefits, and lack of a public transportation system. This is key point for Fremont County due to the concentration of disabled residents in all three census tracts.

It is also a challenge for residents in the Tetonia area. This community has a longer drive time to access health care than most of the other small communities. It is not served by the public transportation service that Driggs, Victor, Teton Village, and Jackson Hole has access to.

### FOOD STAMPS VENDORS

Tetonia does not have access to a vendor that had been approved by the FDA to accept food stamps. This is a key point for Teton County because of the concentration of Hispanic population and low income residents in the surrounding area. The nearest food stamp vendor is 18 miles away. Tetonia previously had a grocery store that went out of business, now the only source of groceries is a local convenience store. The convenience store has applied to be a provider but has been turned down due to size of inventory.

According to the census, Hispanic households are less likely to have access to their own vehicles for transportation. Tetonia does not have access to public transportation. TRPTA operates within Teton County; however it follows a limited route from the Center of Driggs to Teton County WY. There is no public means of transportation North of Driggs.

#### AFFORDABLE HOUSING LOCATION

A key point for the cities of Driggs, Rexburg, and St. Anthony is the location of fair housing and its distance from town centers. If resources are not accessible a potential barrier to opportunity or service could exist.

#### FOOD STAMPS: JOB TRAINING EMPLOYMENT REQUIREMENTS

The current job training requirement can only be met by attending classes in Idaho Falls three times per week for an hour. There is no monetary assistance to cover the costs of transportation to the training site.

Participants are required to meet a minimum weekly quota of new job applications submitted. Small towns can also exhaust their potential employer base for applications in a short period of time.

The combination of these two factors can create a potential barrier to accessing services for rural residents in need.

#### EMPLOYMENT SERVICES: JOB SERVICE

There are primarily two ways to access Idaho Job services 1) travelling to the office located in Rexburg Idaho 2) Accessing the service online. For households that do not live in Rexburg, travelling out of county for job searches could be potential barrier to employment. However, if households are able to access the same services online, no barrier would exist.

At this time, there is no regional data or studies available to determine if there is a potential barrier to Internet Service. It is complicated since the infrastructure

has disparities that impact the cost. Provider availability varies based upon household location instead of by county and city.

Having access to affordable efficient internet service is critical in order to access the online resources. This may be an access issue for populations that do not have transportation or internet access.

#### TRANSPORTATION AS AN IMPEDIMENT TO FAIR HOUSING

Transportation costs are estimated to be as high as 10-20 % of a households cost burden to live in a particular area. In the past, the cost of transportation attached to living in one area compared to another has not been accurately measured. Over the past decade, transportation costs have been used in estimating what household costs are affordable. The development of an affordability index based on combined housing and transportation costs has been widely adopted. There are several methods available for estimating the transportation burden of a community.

## BIBLIOGRAPHY

- American Planning Association . (July 2007 ). *Zoning as a Barrier to Multifamily Housing Development, Report #548* . Maryland: Planning Advisery Service.
- American Planning Association. (Adopted April 2006 ). *Policy Guide on Housing*. Legislative and Policy Committee, Chapter Delegate Assembly, Board of Directors.
- American Planning Association. (2006). *Policy Guide on Housing: Specific Policy Positions*. Legislative and Policy Committee .
- BBC Research & Consulting. (May 2012). *2011 Anlysis of Impediment to Fair Housing Choice*. Idaho House and Finance Association, Idaho Department of Commerce, State of Idaho , Denver Colorado .
- BBC Research & Consulting. (2007). *Housing Needs Assement of Teton County, Idaho*. Dept. Planning and Zoning , Teton County Board of Commissions, Denver CO.
- Center for Rural Pennsylvania. (2006). *Affordable Housing in Rural Pennsylvania*. A Legislative Agency for Pennsylvania General Assembly .
- City of Idaho Falls. (2010 ). *Analysis of Impediment to Fair Housing* . Community Development Planning and Building Division, Idaho Falls, Idaho .
- City of Idaho Falls. (2012). *FY12 CDBG Annual Action Plan: Resolution SF 424*.
- County, T. (2012 ). *Teton County Comprehensive Plan 2012*.
- County, T. (Amended 2008). *Teton County Idaho Comprehensive Plan 2005*.
- Cumberland Couty Offices . *Agricultural Preservation Zoning: Tri-County Region*. Commissioners Strategic Planning, Carlisle PA.
- Department of Agriculture and Markets . (Print Date: Jan 2008 ). *Local Laws and Agricultural Districts: How do they relate?* New York State Department of State Division of Local Government , Department of Agriculture and Markets. Albany NewYork: James A Coon LoCal Government Technical Series.
- Dept of Housing and Urban Development. (2012). *OSHC\_FHEA Lookup Tables*. Office of Policy Development & Research.
- Eastern Idaho Community Action Partnership. (2012, January 1). *About EICAP*. Retrieved November 21, 2012, from Eastern Idaho Community Action Partnership: <http://www.eicap.org/about>
- Eastern Idaho Community Action Partnership. (2012, January 1). *Affordable Housing*. Retrieved November 21, 2012, from Eastern Idaho Community Action Partnership: <http://www.eicap.org/programs/content-pages/housing>
- Eischer, T. S. (2008). *Housing Prices and Land Use Regulations: A Study of 250 Major US Cities*. University of Washington.

(Volume 1). *Fair Housing Planning Guide*. Office of Fair Housing and Equal Opportunity , Fair Housing Information Clearinghouse. US Department of Housing and Urban Development.

Falls, C. o. (2011-2015). *Five Year Consolidated Plan* .

Federal Financial Institutions Examination Council. (2011). *Home Mortgage Disclosure Act & Community Reinvestment Act Census Data*.

Fremont County . (2011 Edition). *Fremont County Development Code*.

Fremont County . (2008 Revisions). *Fremont Comprehensive Plan* .

Glaeser, E., & Gyourko, J. (FRBNY Economic Policy Review 2003). *Impact of Building Restrictions on Housing Affordability*. Federal Reserve Bank of New York, Economic Policy.

Housing and Urban Development . (2012). *The FHEA compared to the Regional AI*.

[http://tax.idaho.gov/EPB00129\\_11-08-2010](http://tax.idaho.gov/EPB00129_11-08-2010). (2010). *2010 Average Property Tax Rates*. State of Idaho Tax Commission.

HUD Office of Sustainable Housing and Communities. (2012). *Memorandum To: Sustainable Communities Regional Planning Grantees*. Fair Housing Equity Assessment Program Guidance.

Idaho Fair Housing Forum. (2011). *Fair Housing Compliance:Local Government Considerations*.

Idaho, U. S.

Interview with Mary Lou Hansen,. (Nov 26, 2012). *Teton County Clerk* . Driggs ID .

Latah County . (2007). *Analysis of Impediment to Fair Housing and Action Plan*. Moscow ID.

Lipman, B., Lubell, J., & Saloman, E. (2012). *Housing an Aging Population: Are we Prepared?* Center for Housing Policy.

Lubell, J., Hickey, R., & Morse, S. (Oct 2012). *Losing Ground: The Struggle of Moderate Income Households to Afford the Rising Costs of Housing and Transportation*. Center for Housing Policy, Center for Neighborhood Technology.

Madison County. (2008). *Madison Comprehensive Plan* .

NAHB Research Center . (April 2007). *Study of Subdivision Requirements as a Regulatory Barrier*. Washington, DC: Office of Policy Development and Research: US Dept. of Housing and Urban Renewal .

NAHB Research Center. (2007). *Study of Subdivision Requirements as a Regulatory Barrier*. Office of Policy Development and Research , Department of Housing and Urban Development , Washington DC.

Partnership for Sustainable Communities . (Fall 2011). *Supporting Sustainable Rural Communities*. U.S. Department of Transportation, US Environmental Protection Agency, Housing and Urban Development .

Partnership for Sustainable Rural Communities. (2012). *Federal Resources for Sustainable Rural Communities*. Housing and Urban Development, Department of Transportation, Environmental Protection Agency, USDA. (Nov 22, 2012). *Phone Interview with Dawn Felche, Risk Manager & Assistant to BOCC*.

*Phone Interview with Glenn Vitucci, Chairman*. Teton County ID Housing Authority Commission (now decommissioned) .

(2001). *Planning for Transportation in Rural Areas*. Federal Highway Administration, Federal Transit Administration . Bellevue WA 98004: Dye Management Group, Inc.

PLanning, T. C. (2012). *Teton County WY Comprehensive Plan* .

Rudel, T., O'Neil, K., McDermott, M., & Gottlieb, P. D. (2011 Joint Conference ). *Is Agricultural Zoning Exclusionary*. Rutgers University, Agriculture & Applied Economics Association: Pennsylvania. Pittsburg Pennsylvania: Northeastern Agricultural and Resource Economics Association.

Services, N. H. (Updated Sept. 2010 ). *Innovation Land Use Techniques: Handbook for Sustainable Development*. State of New Hampshire .

Smith, J. (2011, February 26). Eastern Idaho Entrepreneurial Center. (G. Brown, Interviewer) New York, New York, United States of America: Brooks. (2006). *The Affordability Index: A New Tool for Measuring the True Affordability of Housing Choice*. Center for Neighborhood Technology, Center for Transit-Oriented Development. Washington DC: The Brookings Institute . United States Department of Agriculture Rural Development. (2012, October 29). *Housing and Community Assistance*. Retrieved November 22, 2012, from USDA Rural Development: [http://www.rurdev.usda.gov/LP\\_Subject\\_HousingAndCommunityAssistance.html](http://www.rurdev.usda.gov/LP_Subject_HousingAndCommunityAssistance.html)

United States Department of Agriculture . (Accessed November 17, 2011). *Snap Retailer* .

United States District Court: State of Idaho . (Nov 1997). *CIV: 98-0455-EBLW* . US Census Bureau. (2010). *2010 Census Data Summary File 1 & 2*.

US Census Bureau. (Summary File 3, 2000). *Employment Status and Commuting to Work, Subdivision and Place*.

US Census Bureau. (2012). *Means of Transportation to Work by Workers Earnings in past 12 Months*.

US. Department of Agriculture. (2012). *Food Stamp Retailer Locations*. Food and Nutrition Services: Supplemental Nutrition Assistance Program .

Western Economic Services. (2011). *2011 Wyoming Analysis of Impediment to Fair Housing Choice*. Wyoming Community Development Authority, Portland OR.

WY, T. C. (2012 ). *Zoning Regulations 2012* .

Wyoming, T. C. (Last Printing 2002). *1994 Housing Needs Assessment: Affordable Housing Needs Assessment* .  
 Zoning, T. C. (6/14/2012). *Teton County Idaho Zoning Ordinances*.

## APPENDIX:

### PUBLIC INTERVIEWS

Figure 1

Reasons for Discrimination	
Answer	Responses
Source of Income	3
Color	1
Religion	0
Age	1
National Origin	1
Gender	2
Race	3
Disability	0
Familial Status	0
Other	3
Total	14

Figure 2

Who Discriminated	
Landlord / Property Manager	6
Real Estate Agent	2
Mortgage Lender	2
Other	0
Total	10

Figure 3

Where the act of Discrimination took Place	
Apartment Complex	6
Condo Development	1

Single-family Neighborhood	4
Other	0
Total	11

Figure 4

Reasons for not reporting	
Didn't know where to report	3
Weren't sure of their rights	2
Afraid of Retaliation	0
Wouldn't make a difference	4
Other	1
Total	10

## STAKEHOLDERS

Figure 5

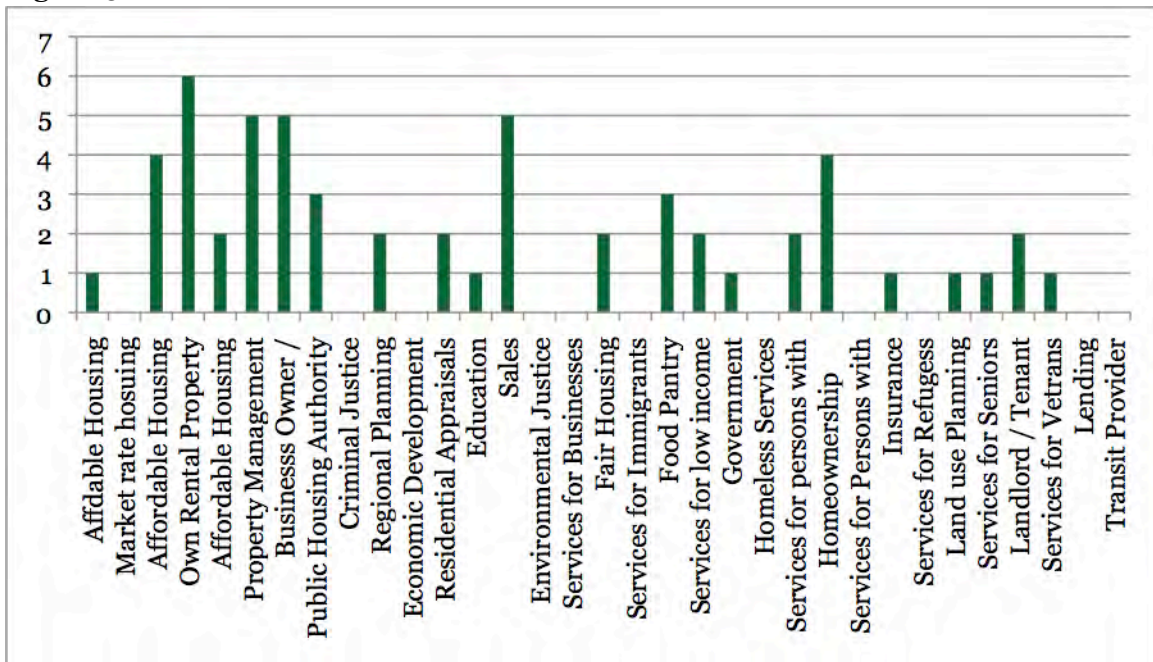


Figure 6

Ranking the Top 3 Areas of Concern regarding Provision of Fair Housing Choice					
	1st	2nd	3rd	4th	Total
Actions of Homeowner Associations	1	0	0	0	1
Age Discrimination	1	0	0	0	1
Employment Issues	3	5	3	0	11
Fear and Misunderstand of those with disabilities	0	1	1	1	3
Inadequate enforcement of Existing Laws	1	0	0	0	1
Lack of Affordable Housing	3	4	2	0	9
Lack of Education about fair housing rights and responsibilities	1	0	2	0	3
Language / culture issues	1	1	1	0	3
Lending practices / foreclosures	0	0	3	0	3
Local regulations	0	0	0	0	0
Racial Bias	1	1	0	0	2
Total	12	12	12	1	

Figure 7

Population groups most underserved in terms of safe affordable housing					
	1st	2nd	3rd	4th	Total
Low-income persons and families	4	0	5	0	9
Middle-income persons and families	3	0	0	0	3
Upper-income persons and families	0	0	0	0	0
Area workforce	3	2	1	0	6
Elderly	0	2	3	0	5
Individuals with disabilities	2	3	2	1	8
Minorities	1	2	0	0	3
Homeless	0	4	1	0	5
Other	0	0	1	0	1
Total	13	13	13	1	

Figure 8

Which types of housing are most needed					
	1st	2nd	3rd	4th	Total
Single family owner housing	2	1	1	0	4
Rental housing	2	2	1	0	5
Entry-level ownership housing	4	2	3	0	9
Apartment Housing	2	3	0	0	5
Duplex / triplex / townhome housing	0	0	2	0	2
Downtown housing	0	1	0	0	1
Group home housing	1	0	0	0	1
Long-term care housing	0	0	1	0	1
Elderly owner & rental housing	0	0	0	1	1
Rent-to-own housing	0	2	1	0	3
Other	2	0	2	0	4
<b>Total</b>	<b>13</b>	<b>11</b>	<b>11</b>	<b>1</b>	

Figure 9

Directly or indirectly create or lead to impediments to fair housing choice	
Site	3
Tenant selection	3
Property tax assessments	2
Planning and zoning	4
Housing, building, occupancy, health and safety codes	1
Demolition & displacement	1
Real estate practices	1
Banking and insurance practices	1
<b>Total</b>	<b>16</b>

OTHER

Figure 10

Impediments Matrix										
Impediment	Source									Protected Classes Most Affected
	Census Data	Review of Fair Housing Profile	HMDA Data	HUD Housing Complaint Review	Advertisement Analysis	Fair Housing Survey	Stakeholder Survey	Fair Housing Forums	Other	
<b>Private Sector</b>										
Denial of available housing in the rental markets						X	X			Disability, race, national origin, gender, religion, familial status
Discriminatory refusal to rent						X	X			Disability, race, national origin, familial status, sex
Discriminatory terms, conditions of privileges relating to rental						X	X			Disability, race, national origin
Failure to make reasonable accommodation or modification		X								Disability, race, national origin
Preferences stated in advertisements										Disability, race, national origin, familial status
Denial of availability of housing in the home purchase market										Disability, race, national origin
Denial of home purchase loans										Race, national origin, sex, disability
Occurrence of predatory lending activities in the home purchase market										Race, national origin
Denial of loans specifically for homes within tribal trust lands										Race
Steering in the real estate markets										Race, national origin
Failure to comply with accessibility requirements in construction of housing units	X	X						X		Disability
<b>Public Sector</b>										
Unsuccessful past efforts to enact statewide fair housing law		X							X	All
Ineffective enforcement of fair housing laws due to lack of fair housing infrastructure								X	X	All
Limited access to fair housing services due to lack of Fair Housing Initiative Program recipient or state enforcement agency		X								All
Historical establishment of policies and practices resulting in segregation of minority populations										Race, national origin, disability
Insufficient establishment and enforcement of building codes regarding special needs housing		X						X		Disability
Decision made regarding definitions of "family," "dwelling unit," and related terms made by cities within the county are inequitable		X								Familial status, disability
Resistance or Not In My Backyard (NIMBY) sentiment toward development of special needs housing										Disability

