



**Analysis of Impediments to Fair Housing  
Choice Study  
City of Caldwell, Idaho  
2026-2030**



March 9, 2026

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## I. Introduction

As part of the HUD consolidated planning process, states and entitlement communities receiving Community Development Block Grants (CDBG) must submit to HUD an Analysis of Impediments to Fair Housing Choice (AIFH).

In April, 2025, the Caldwell City Council passed Resolution 123-25, *“Restating that discrimination in the sale, rental, leasing, financing or housing or land to be used for construction of housing or in the provision of brokerage services because of race, color, religion, sex, or national origin is prohibited by Title VIII of the 1968 Civil Rights Act (Fair Housing Law.)”*

The City publicized the resolution in order to *“encourage owners of real estate, developers, and builders to become aware of their respective responsibilities and rights under the Federal Fair Housing Law and amendments and any applicable state or local laws or ordinances.”*<sup>1</sup>

Additionally, the Caldwell Housing Authority utilizes the following approach in addressing Fair Housing Choice.

*“The Caldwell Housing Authority adheres to Title VI of the Civil Rights Act of 1964, Title VIII of the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and the Americans with Disability Act. In accordance with federal law, the Caldwell Housing Authority is prohibited from discriminating on the basis of race, color, national origin, age, disability, religion, sex and familial status. The Caldwell Housing Authority further embraces the diversity of our community and does not discriminate based on sexual orientation or gender identity. If you feel the housing authority has discriminated against you, please feel free to contact Idaho Legal Aid or the Idaho Human Right Commission.”*<sup>2</sup>

As defined in The Fair Housing Planning Guide, the definitions of impediments to fair housing choice include:

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

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<sup>1</sup> <https://www.cityofcaldwell.org/files/assets/city/v/1/city-clerk/documents/title-vi/res-123-25.pdf>

<sup>2</sup> <https://chaidaho.org/occupancy-policy/>

## The Analysis

### A. Who Conducted

The following Analysis of Impediments to Fair Housing was conducted by Caldwell, Idaho, with the assistance of an independent consultant, Karen Dash Consulting LLC<sup>3</sup> of Wilmington, North Carolina (hereafter “study team.”) The analysis was completed within the context of preparation for the HUD Consolidated Plan submitted for the jurisdiction for the 2026-2030 reporting period.

### B. Participants

In all, the opinions of over 110 community members informed the Consolidated Planning Process. In preparation of the Consolidated Plan and Analysis of Impediments to Fair Housing Choice, the City consulted with twenty two agencies through two focus groups and key stakeholder interviews. Additionally, thirty people attended our first public hearing in January, and another group will attend our June 1, 2026 final public meeting. Forty eight completed a Community Survey in English; there were no responses to a Spanish-language survey.

The jurisdiction engaged in a robust process of including citizen participation within the Consolidated Planning process. Community surveys in English and Spanish, and notices of public meetings in English and Spanish, were distributed via the City’s social media, website, and community partners. A local publication provided information about the survey and public meetings as well. The appendix provides a list of agencies consulted within the development of the Consolidated Plan and the Analysis of Impediments to Fair Housing.

### C. Methodology Used

This analysis is premised on the assumption that people have a right to equal treatment in their search for a place to live and the City should take an active role in the community to help make life better for its citizens. The methodology, which was conducted concurrently with development with the Consolidated Plan, is detailed below.

Review of Demographic, Income, and Employment/Workforce Data: The team conducted an extensive analysis of the demographics, income, and employment/workforce profile of the city, including a review of the geographic distribution of racial, ethnic, and income groups through detailed maps by census tract.

Housing Profile: The team analyzed the particular housing demographics and profile of Caldwell, whose population has increased by over 300% since 1990,<sup>4</sup> while housing prices have increased, particularly in the last five years. The team also consulted with government, housing, and real estate officials regarding their opinion of the Caldwell area housing market.

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<sup>3</sup> <https://www.karendashconsulting.com/>-

<sup>4</sup> <https://worldpopulationreview.com/us-cities/Idaho/Caldwell>

### Public Outreach – Fair Housing Survey

In addition to the feedback received through our interviews and focus groups/public meetings, the team also surveyed citizens regarding their experience with Fair Housing issues, as well as their awareness of Fair Housing laws and ways to seek assistance.

### Evaluation of Caldwell’s Current Fair Housing Legal Status/Fair Housing Informational Programs - - Resources and Education

Through research and interviews, the team analyzed the City’s current legal status. The team researched and evaluated the Fair Housing resources and information offered by the City of Caldwell and regional partners.

Fair Housing Complaints/Enforcement: The team reviewed 198 Fair Housing complaints submitted to the Intermountain Fair Housing Council from 2023-2025. The team reviewed for any trends or patterns within the data.

Review of Fair Lending Data: The team conducted a rigorous analysis of the Home Mortgage Disclosure Act (HMDA) lending data for Caldwell residents available through the Consumer Financial Protection Bureau.

Review of Caldwell Policies and Programs: The study team conducted a detailed review of the city’s housing policies, zoning and planning codes, laws, and regulations, including in-depth discussions with key planning, housing, and other officials. Specifically, the team researched:

- Zoning and Land Use
- Development Fees
- Building Codes
- Caldwell Policies to Increase Affordability
- Caldwell Housing Authority Policies
- Neighborhood Revitalization Strategy Areas (NRSA)
- Employment-Housing-Transportation Linkage
- Taxation
- County or State Laws Affecting Caldwell

In the last category above, we reviewed challenges presented by county and state laws. Although Caldwell in and of itself cannot change those laws, their impact has implications on Caldwell households and government policy.

### **D. Potential Impediments to Fair Housing Choice**

The City of Caldwell seeks to ensure Fair Housing Choice is available to all residents. Some of Caldwell’s policies and programs, as we discuss within our report, can serve as models for other communities in trying to meet Fair Housing goals through the development and preservation of

affordable housing.

Indeed, the City's updated Comprehensive Plan, completed in April 2025, received the Outstanding Plan Award from the American Planning Association (APA) Idaho chapter in October 2025. The Plan increases density in the downtown area, in part to make the provision of utilities more economically feasible and thus reduce the cost of housing development.

However, as with every jurisdiction, there may be opportunities for additional actions and strategies. The following potential impediments have been identified for Caldwell. More detailed discussions are included within the individual sections.

#### *Potential Impediment to Fair Housing Choice – High Cost of Housing*

Like much of the country, the City of Caldwell has seen housing prices increase significantly over the last decade, creating challenges for people on fixed incomes, and those looking for starter homes. City officials feel the most cost-effective way to support affordable housing is to focus on preserving existing stock through repairs and renovations; assist qualifying homeowners with downpayment assistance; and to continue to seek opportunities to work with developers to build affordable housing units.

**RECOMMENDATION:** The City's approach of working with developers to build housing stock while helping preserve existing stock has become an important strategy in many communities around the country. While the City has no control over the housing market, Caldwell can continue its work with developers, landlords, and residents to try to increase access to Fair Housing Choice. Caldwell has made multiple efforts to incentivize developers, including supporting developers who seek LIHTC funding through the state.

#### *Potential Impediment to Fair Housing Choice – Lack of Awareness of Fair Housing Laws and Reporting*

As the Community Survey results indicated, Caldwell has made progress in raising awareness among all residents of Fair Housing Laws, with nearly 86% of Hispanic/Latino and 82% of non-Hispanic/Latino survey respondents reporting their awareness. One hundred percent of Hispanic or Latino residents surveyed, and nearly 96% of non-Hispanic or Latino residents, report strong interest in reporting complaints.

In terms of knowledge of How to Report a Complaint, a potential opportunity exists to increase education and awareness, perhaps in other languages. People of Hispanic/Latino ethnicity, for example, report lower rates of knowledge about how to report Housing Discrimination in Caldwell (57.1% vs. 81.8% of non-Hispanic/Latino respondents.)

**RECOMMENDATION:** The Caldwell City Council’s April 2025 Resolution 123-25 offers strong direction for the City in strengthening Fair Housing awareness among residents, owners of housing, realtors, builders, and others involved in the housing industry.

The City might consider providing additional Fair Housing educational materials in other languages on its website or in hard copy form throughout the community. The City may consider offering Fair Housing Education in conjunction with local events (e.g., community event) to increase dissemination of this knowledge.

*Potential Impediment to Fair Housing Choice -- Challenges for People with Disabilities*

Our study team analyzed Fair Housing complaints over a recent three-year period that were brought to the Intermountain Fair Housing Council, an agency that works to ensure fair housing access for all citizens. Nearly half of all cases involved a complaint related to Disability, and the vast majority were rental transactions.

Disability remains a top fair housing complaint reason in many jurisdictions across the country. The National Fair Housing Alliance (NFHA)’s 2025 Fair Housing Trends Report shows that, of 32,321 fair housing complaints filed nationally in 2024, more than 17,600 (54.6%) were issues of disability discrimination,<sup>5</sup> resulting from landlords’ refusal to grant reasonable accommodations, physically inaccessible housing features, or refusals to modify policies for disabled tenants.

Within Caldwell, while a shortage exists for affordable housing, stakeholders suggest an additional need for housing that is both affordable and accessible. If people with disabilities are on fixed incomes, their housing options are further limited. Fair Housing complaints and ongoing fair housing education may result in more landlords’ willingness to make reasonable accommodations or modifications.

**RECOMMENDATION:** As with the recommendation above suggesting building on the City’s April 2025 Resolution to strengthen awareness of Fair Housing issues, the City might also seek to educate landlords and the broader community on the need for reasonable accommodations or modifications to homes for people with disabilities. Caldwell might also help assist people in requesting accommodations or modifications. The City might also expand awareness of its programs to help homeowners financially who seek to make safety or accessibility modifications to their homes.

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<sup>5</sup> <https://www.offitkurman.com/offit-kurman-blogs/2025-fair-housing-trends-compliance-risks>

### *Potential Impediment to Fair Housing to Fair Housing Choice – Need for Builder Education*

An opportunity might exist to educate providers on some practices that might make homes more accessible to more people. A Fair Housing official said that she often hears housing providers say, “We didn’t know we could do that.” Other sources of confusion for builders include whether a conditional or special use permit is required for the development of a certified family home or group home.

**RECOMMENDATION:** The Fair Housing official thought that low-income housing developers might benefit from a development checklist so that they understand the various steps of the process, including accessibility, environmental impacts, and fair housing requirements.

The City might consider adapting existing developer checklists created by other jurisdictions. For example, Boston offers a checklist.<sup>6</sup> Other cities with checklists and applications include Burien, Washington.<sup>7</sup>

### *Potential Impediment to Fair Housing Choice -- Lack of County Eviction Court Options*

With high and unpredictable rental prices, renters may find it difficult to obtain affordable, decent housing and/or maintain housing stability. As a result, eviction rates have significantly increased in Caldwell and the region generally. One official noted that, in nearby Ada County, the court system allows for 3<sup>rd</sup> party mediation to help work out a payment schedule and keep people in their homes.

According to an official who helps renters through the mediation process, approximately 80% of the participants are able to successfully comply with the terms of the mediation agreement and keep their homes and keep their evictions off their permanent record. According to this official, Canyon County, which has seen its eviction filings increase from 200 a few years ago to over 700 today, does not offer this option.

**RECOMMENDATION:** Because Eviction Court is a county institution, there is little Caldwell can do to change this current policy, beyond lobbying for a mediation process that helps develop agreements that allow families to retain their housing and landlords to be compensated.

### *Potential Impediment – State Laws regarding Homelessness*

Caldwell has begun to see an increase in its homeless population, likely due to a variety of factors. An Idaho state law that took effect July 1, 2025 requires jurisdictions with 100,000+ residents to enforce laws meant to ban public camping and sleeping on public property, roads, or rights of

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<sup>6</sup> [https://www.boston.gov/sites/default/files/file/2024/08/14B-2024-08-02\\_MOH%20Design%20Checklists.pdf](https://www.boston.gov/sites/default/files/file/2024/08/14B-2024-08-02_MOH%20Design%20Checklists.pdf)

<sup>7</sup> (<https://cdnsm5->

[hosted.civiclive.com/UserFiles/Servers/Server\\_11045935/File/Business/Building%20&%20Construction/Permit%20Center/Inspection%20Checklists/Affordable%20Housing%20Demonstration%20Program%20Checklist.pdf](https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_11045935/File/Business/Building%20&%20Construction/Permit%20Center/Inspection%20Checklists/Affordable%20Housing%20Demonstration%20Program%20Checklist.pdf))

way, regardless of shelter bed availability.

Several larger cities around Caldwell (Boise, Meridian, Nampa) exceed 100,000 in population and therefore may be forcing homeless people to seek other accommodations, including within Caldwell. Some local officials have suggested that homeless people are also coming from other states, where they may have been undocumented immigrants and/or homeless.

The City is trying to identify a strategy to support the new influx of unhoused people. One official noted that nearly every day she sees another person on the road sleeping in their car, sometimes parked behind stores or spending time in the library. One local housing official stated that this law puts “people on the periphery in the shadows of the periphery.”

**RECOMMENDATION:** As with the Eviction Court situation discussed previously, changes to this policy are not within the City’s authority to change. Caldwell can continue to work with its Continuum of Care on Homelessness (CoC) and community partners to support people at risk of homelessness or those who are homeless.

#### **E. Conclusions**

Caldwell has made strong efforts to provide affordable and accessible housing through its various policies. Zoning and building codes do not appear to be a barrier to affordable housing. As previously stated, some of the City’s policies and programs can serve as models for other communities, and in particular the Caldwell 2025 Comprehensive Plan.

Rather, the greatest barriers to affordable housing within the City of Caldwell, like much of the state and country, is the increasingly high cost of housing. High costs are particularly challenging for those on fixed incomes, including seniors and people with disabilities.

The City of Caldwell has numerous programs and strategies in place to support every resident in searching for and accessing safe housing for themselves and their families. A more detailed discussion of these potential impediments and recommendations for Caldwell’s consideration is included within the individual sections of this analysis.

## II. Community Profile

### Brief Overview of Caldwell

About 30 miles from Boise, the largest metropolitan area in Idaho, Caldwell is located on the western edge of The Treasure Valley region. Founded in 1883 by the Idaho and Oregon Land Improvement Company and incorporated in 1890, the city attracted settlers seeking opportunity in the area's gold mines, trading near the Boise River, building railroads, or forging the region's strong agricultural sector.

As the county seat for Canyon County, Caldwell is home to the College of Idaho, ranked the #1 small liberal arts college in the U.S. Visitors and new residents come to Caldwell for the beautiful scenery, a growing wine industry along the Sunnyslope Wine Trail, parks and golf courses, and events like the Canyon County Fair and the Caldwell Night Rodeo.

With 77,610 citizens, Caldwell's population has increased 27.8% from 2020.<sup>8</sup> Per the US Census, nearly 64% of the population is White, with people of Two or More Races representing 17.4% of the population, and over 16% identifying as Some Other Race. Nearly 37% of the population is of Hispanic/Latino ethnicity. Per the US Census, 12.7% of the City's residents were born outside the U.S.<sup>9</sup>

Per the City's Community Profile, major employers include The City of Caldwell, Canyon County, College of Idaho, Caldwell School District, J.R. Simplot, Vallivue School District, and West Valley Medical Center.<sup>10</sup>

Per 2023 5-year American Community Survey (ACS) estimates, about 71% of the City's housing units are owner-occupied and 29% are renter occupied, with about 81% of residential properties single-family housing.<sup>11</sup> The City's long history is reflected in some ways in its housing stock, with 65% of owner-occupied and 52% of renter-occupied housing built before 1980.

The median value of an owner-occupied home in Caldwell is \$367,300.<sup>12</sup> While housing prices continue to climb, the City remains more affordable than most of its neighbors in the area. Per the US Census, Caldwell's median value of owner-occupied homes is over \$160,000 lower than that of Meridian, and more than \$110,000 lower than Boise. Caldwell median rents (\$1,264) are lower than rents in Nampa (\$1,420), Meridian (\$1,805), Canyon County overall (\$1,347), and in Boise (\$1,446). Only rents in Middleton (\$1,147) are lower.

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<sup>8</sup> 2025 <https://www.cityofcaldwell.org/Departments/Economic-Development/City-Statistics>, 2020 ID BLS

<sup>9</sup> <https://www.census.gov/quickfacts/fact/table/caldwellcityidaho/PST045224>

<sup>10</sup> <https://www.cityofcaldwell.org/Visitors/About-Caldwell>

<sup>11</sup> <https://data.census.gov/table/ACSST5Y2023.S1101?q=housing&g=160XX00US1612250>

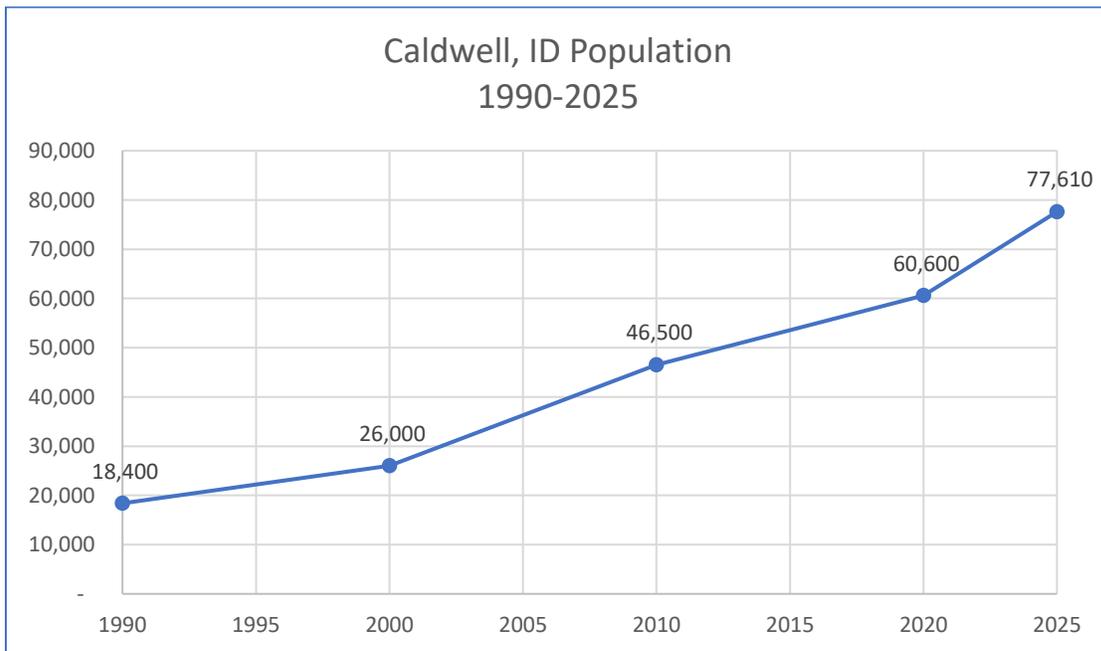
<sup>12</sup> <https://www.census.gov/quickfacts/fact/table/boisecitycityidaho,canyoncountyidaho,meridiancityidaho,nampacityidaho,caldwellcityidaho/PST045224>

## A. DEMOGRAPHIC DATA

### Overall Population

According to the City data, Caldwell's 2025 population is estimated at 77,610, up 27.8% from 2020.

The following chart, based on data from World Population Review,<sup>13</sup> shows the growth of Caldwell's population since 1990; at 77,610, the 2025 City population is over 4x that of 1990.



<sup>13</sup><https://worldpopulationreview.com/us-cities/idaho/caldwell>

## Population by Age and Gender

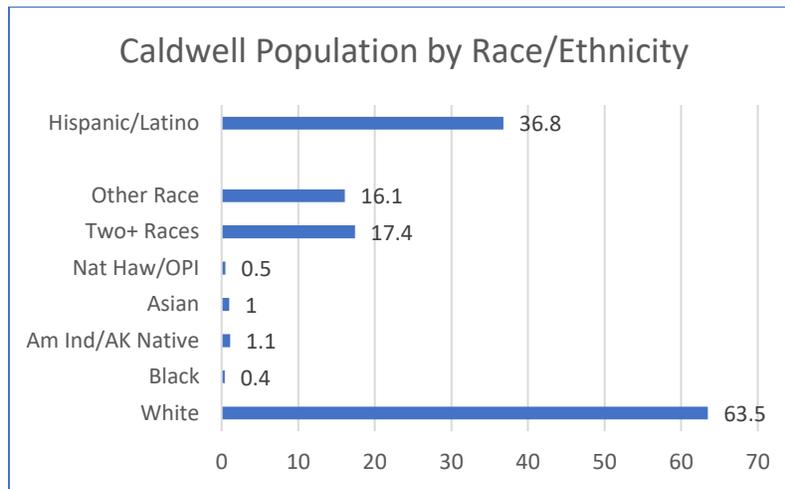
The World Population Review Population chart below shows that the City's population is quite young; for both men and women, the median age is 30-35 years old.<sup>14</sup>



<sup>14</sup> <https://worldpopulationreview.com/us-cities/Idaho/Caldwell#population>

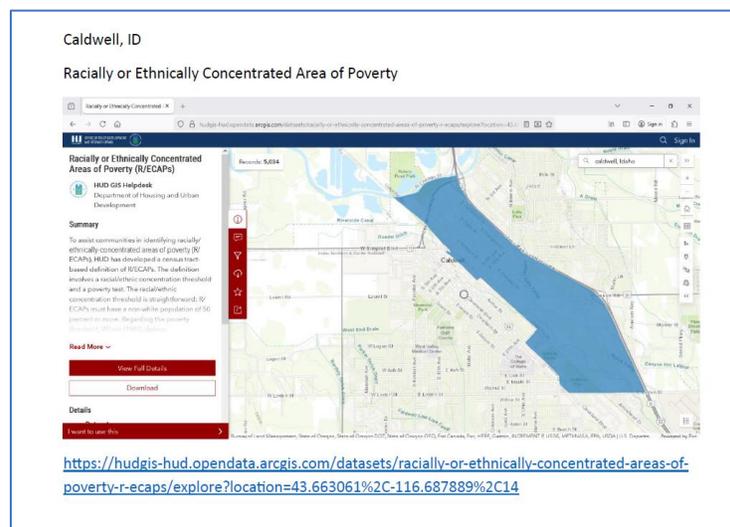
## Population by Race and Ethnicity

Per the US Census estimates, Caldwell's population is predominantly white, with 63.5% of residents identifying as White. Over 16% of residents identified as Some Other Race, and 17.4% of residents identified with Two or More Races. By ethnicity, 36.8% of the population is of Hispanic/Latino ethnicity.<sup>15</sup>



## R/ECAPS Area

HUD has identified an area in the northern part of the City, bounded by I-84, E Linden Street, East Chicago Street, and West Chicago St as R/ECAPs area, defined by HUD as “R/ECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of extreme poverty as census tracts with 40 percent or more of individuals living at or below the poverty line.”<sup>16</sup>



<sup>15</sup> <https://www.census.gov/quickfacts/fact/table/CaldwellcityIdaho/LND110210>

<sup>16</sup> (<https://hudgis-hud.opendata.arcgis.com/datasets/racially-or-ethnically-concentrated-areas-of-poverty-r-ecaps/explore?location=43.663061%2C-116.687889%2C14>)

This R/ECAPS area overlaps with the Caldwell City Council’s plan to adopt a new urban renewal area, with improvements in sidewalks, curbs, and other infrastructure improvements.

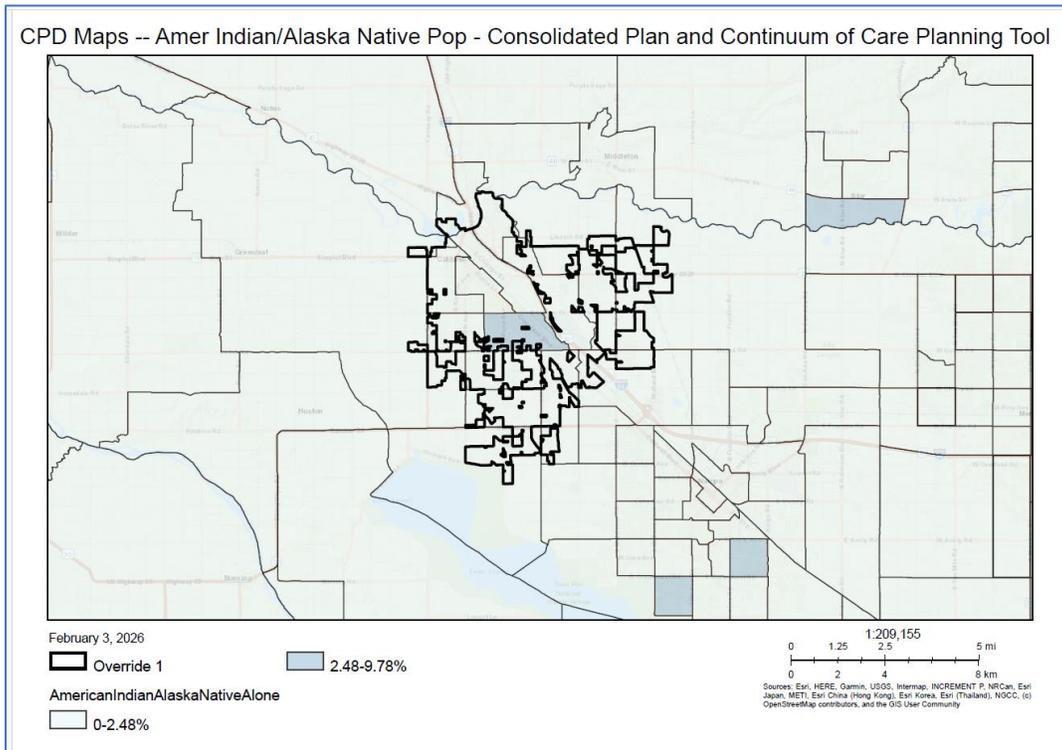
The North Side area has the most diverse population within Caldwell, with a higher share of Spanish-speaking households and lower-income households.

Homes in the Caldwell School District, which is ringed by the Valley View School District, tend to be those of lower-income and with Latino/Hispanic families.

Below we provide analysis of the City’s population by racial/ethnic concentration.

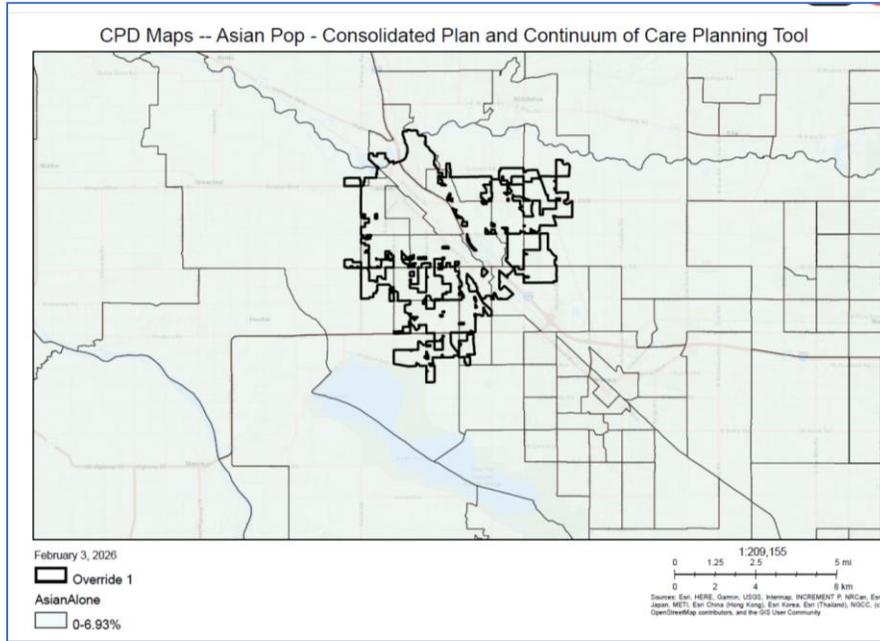
### American Indian and Alaska Native Population by Census Tract, Caldwell 2024

For the majority of Caldwell, under 2.5% of the population identifies as American Indian or Native Alaskan. One Census tract in central Caldwell has 4.4% of its population identifying as American Indian or Alaska Native.



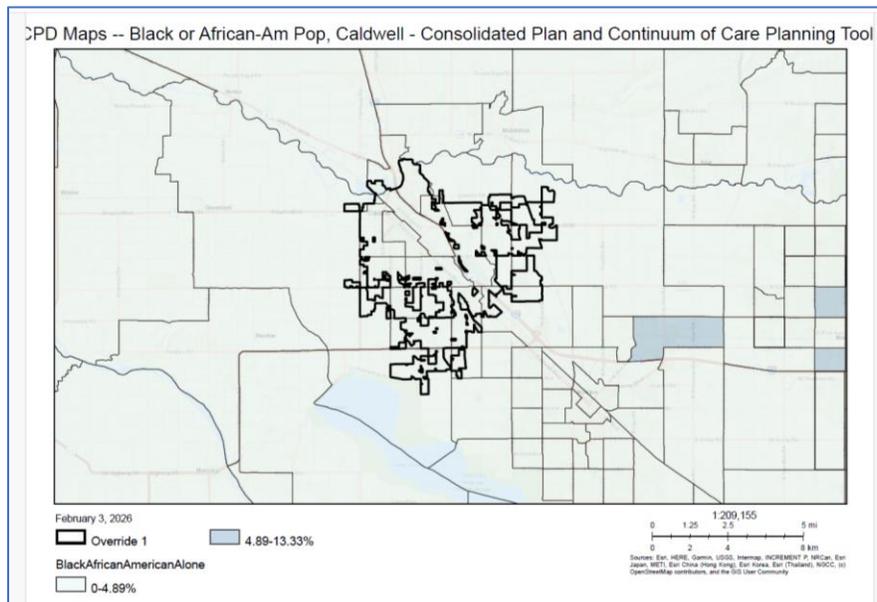
### Asian Population by Census Tract, Caldwell 2024

Caldwell does not have a significant population of residents identifying as Asian; less than 6.93% in any Census tract are Asian.



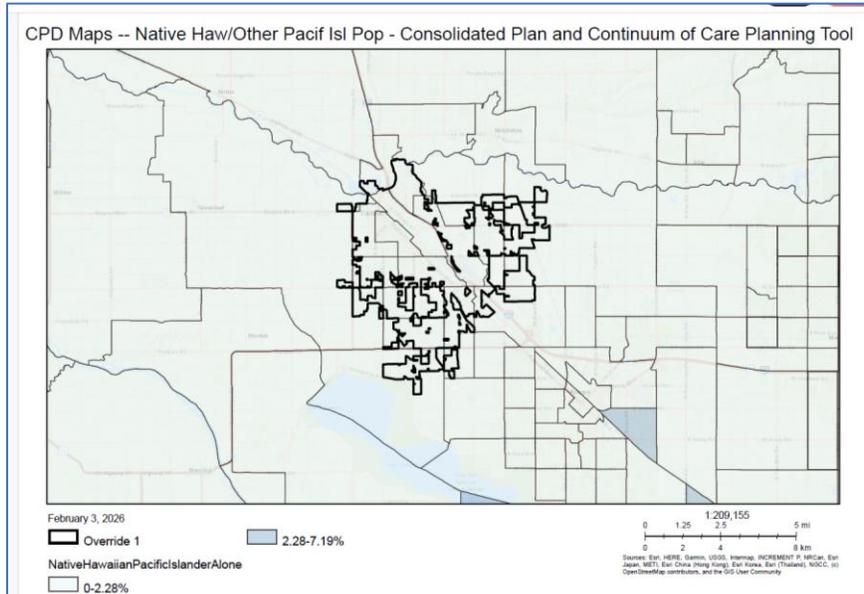
### Black or African American Population by Census Tract, Caldwell 2024

The Black or African American population is less than 4.89% throughout all Census tracts in Caldwell.



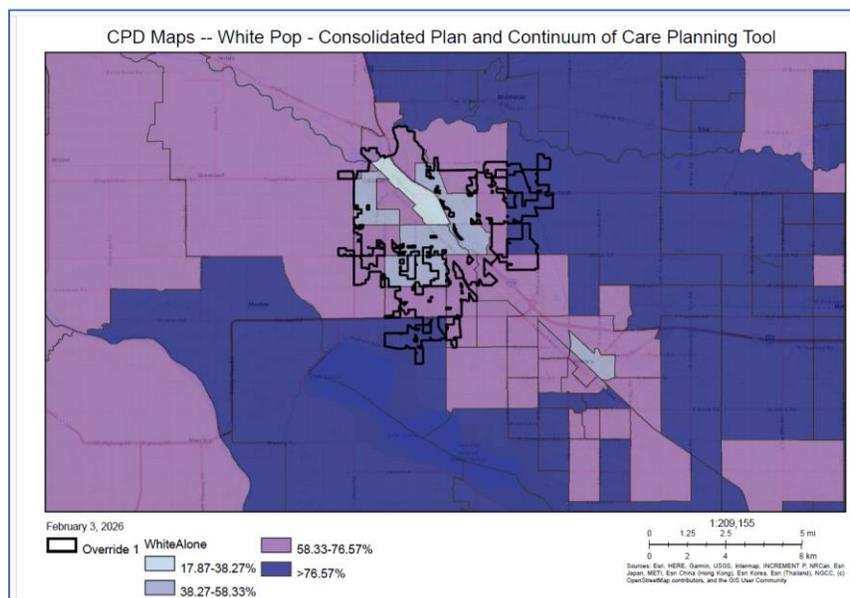
### Native Hawaiian or Other Pacific Islander Population by Census Tract, Caldwell 2024

Few residents of Caldwell identify as Native Hawaiian or Pacific Islander, with no concentrated population in any Census tract. Between 0-2.28% of residents identify as Native Hawaiian or Pacific Islander across all tracts.



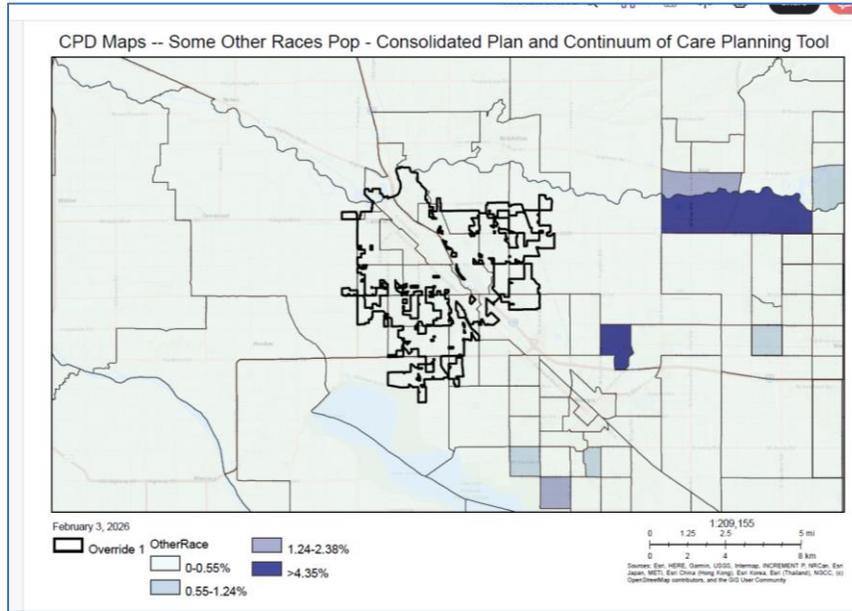
### White or Caucasian Population by Census Tract, Caldwell 2024

Residents in the southern part of Caldwell report a race of White at a higher rate, with greater than 76.57% of the population identifying as white. The White population is highest in the outer sections of the city, especially in the east, southern, and northeastern borders of Caldwell.



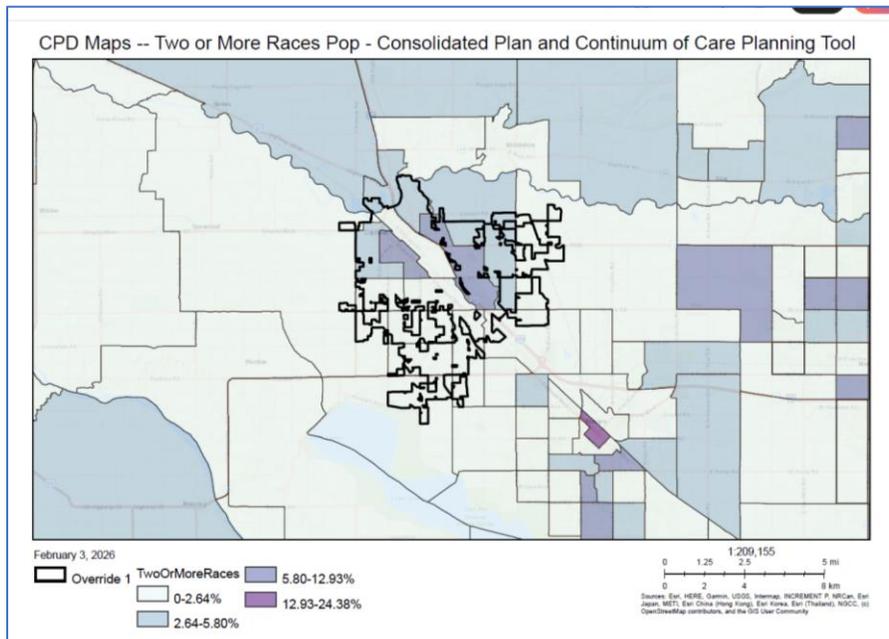
### Some Other Race Population by Census Tract, Caldwell 2024

While Census data suggests that over 16% identify as Some Other Race, this population appears to be lightly dispersed throughout the City, with under 1% in any one census tract.



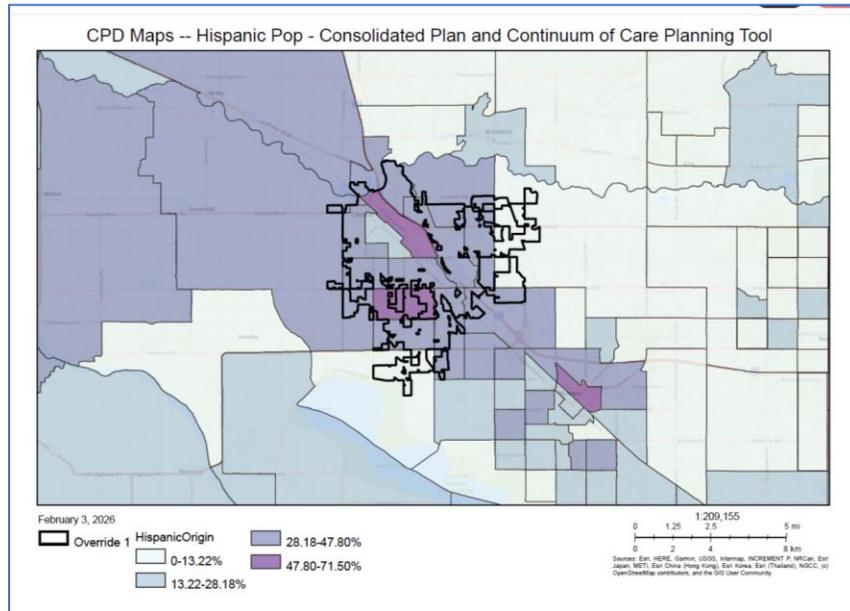
### Two or More Races Population by Census Tract, Caldwell 2024

Residents identifying as Two Or More Races are distributed across the northern half of Caldwell, with the highest concentrations in north central Caldwell, reporting between 5.8-12.93%.



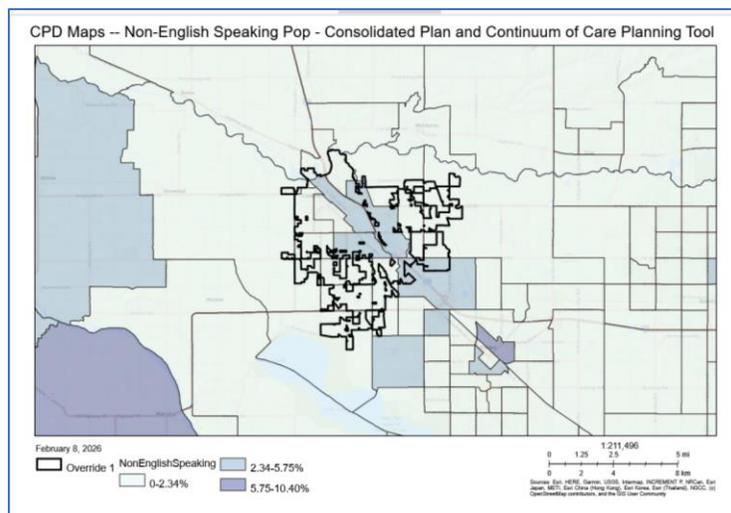
## Hispanic or Latino Population by Census Tract, Caldwell 2024

Residents reporting Hispanic Origin are represented throughout Caldwell's Census tracts, with one tract in northern Caldwell (59.6%) and one in central Caldwell (54.6%) with the highest shares of residents identify as Hispanic. The northern area overlaps with the R/ECAPS area and the City's Urban Renewal Area.



## Non-English Speaking

Three Census tracts in north-central Caldwell report a Non-English-Speaking population of between 2.34-5.75%. This area largely overlaps with a higher population of Hispanic residents and with the HUD R/ECAPS area.

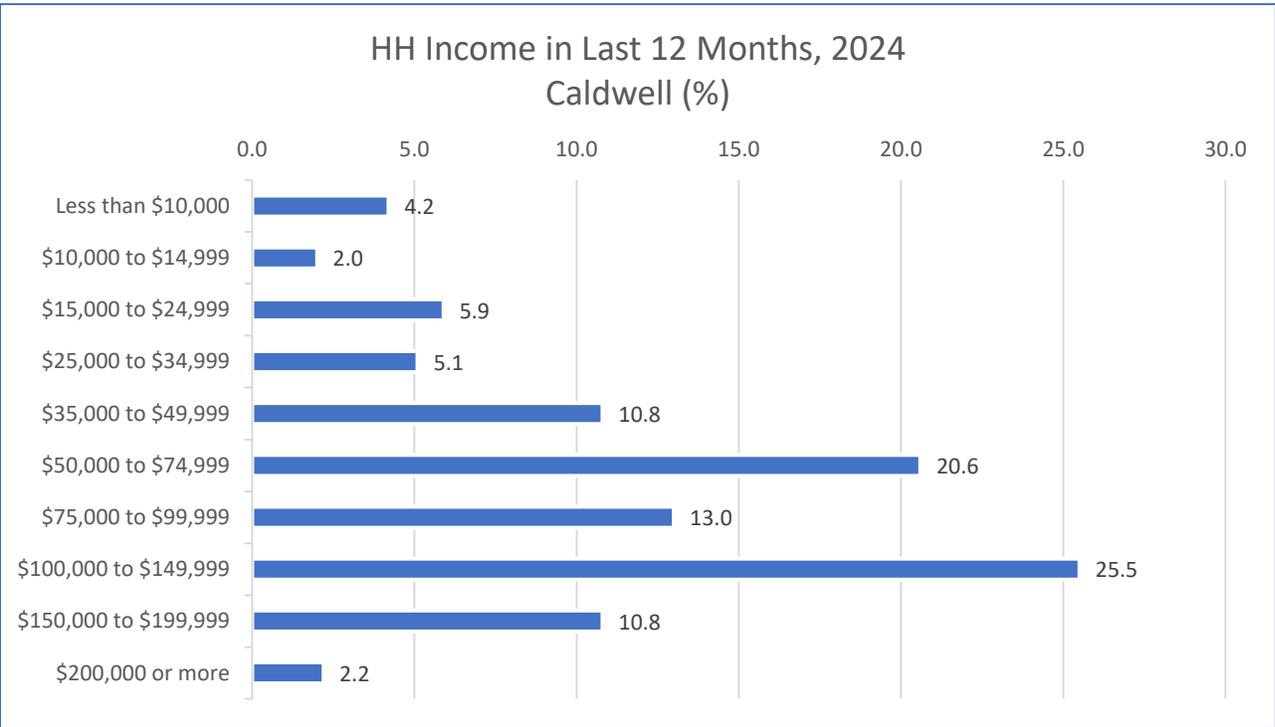


## B. INCOME AND POVERTY

Per 2024 ACS estimates, median household income over the last 12 months in Caldwell is \$78,835. For Canyon County overall, this figure is \$86,018.

### Household Incomes

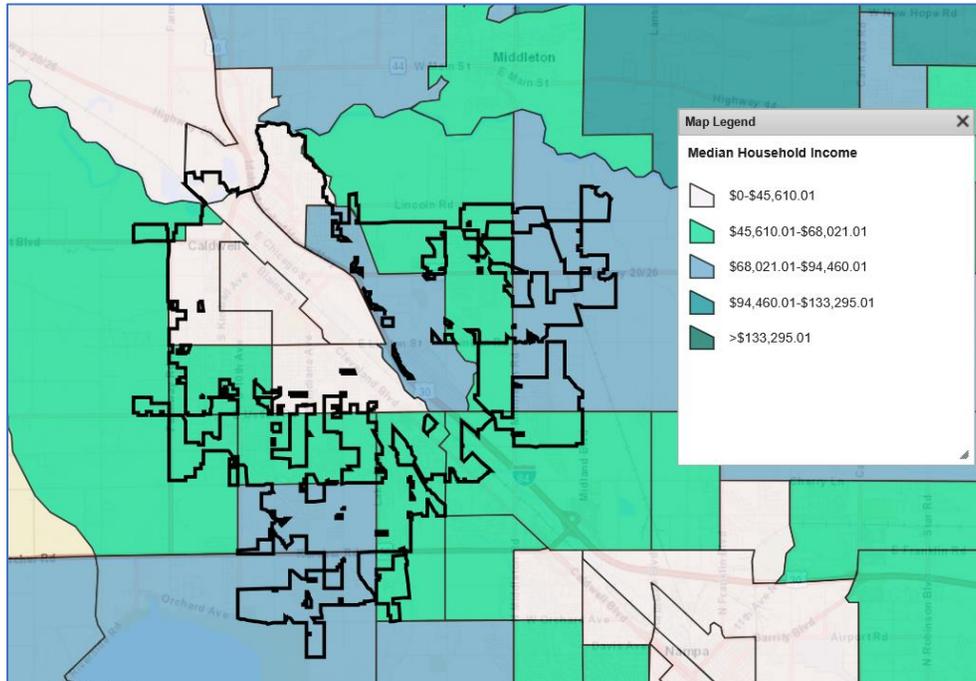
For 2024, 28% of Caldwell households have incomes below \$50,000. The two income categories with the largest shares of population are \$100,000-149,999 (25.5%) and \$50,000-74,999 (20.6%).<sup>17</sup>



<sup>17</sup> Census Table S1901 for Caldwell and Canyon County

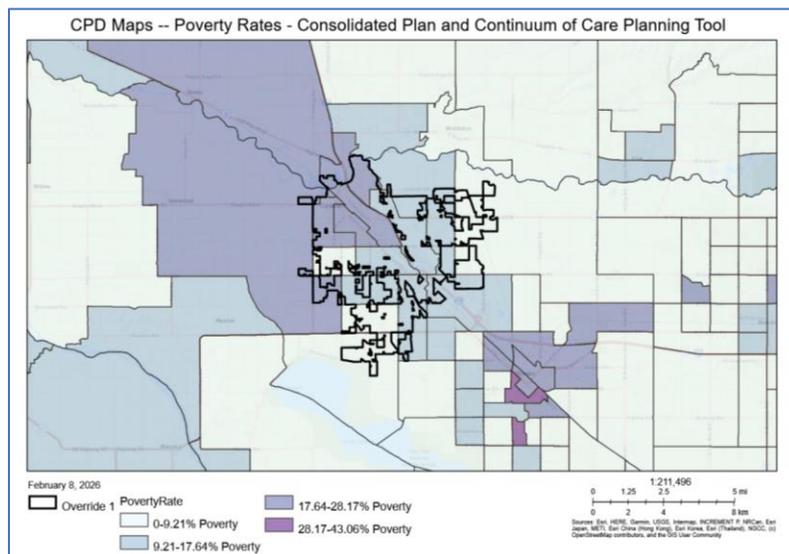
### Median Household Incomes by Census Tract, Caldwell 2024

The median household income in most areas outside the northwestern part of Caldwell is in the \$45,610 to 94,460 range, including one tract with a high share of Hispanic/Latino residents. Census tracts with income between \$0 and 45,610 are located in the northwest and central tracts of the city and also overlap other census tracts with higher shares of Hispanic/Latino residents.



### Poverty Rates, Caldwell 2024

The Poverty Rate in most areas of Caldwell is under 17%, except for several Census tracts in the northwestern region of Caldwell, where the poverty rates range from 17.64-28.17%. Some of these tracts overlap with the census tracts with higher populations of Hispanic residents.



## C. EMPLOYMENT

According to a December 2024 Caldwell Retail and Industrial Study, Caldwell’s population has been growing at 5% or more over the last six years, strongly outpacing that of the US overall. With that additional population, more retailers have been building or planning more locations in Caldwell, including a new Home Depot. Doing so helps the City to return some of the sales tax revenues that nearby Nampa’s grocery stores and retailers collect from Caldwell residents. Today, Nampa collects twice as much in sales tax as Caldwell.

City officials note that manufacturing, particularly in the area of food processing, is a key employment sector in Caldwell. Located on I-84, which runs through Utah, Boise, and Oregon, Caldwell is well-situated to meet manufacturing needs in the region.

Caldwell is also home to Foreign Trade Zone (FTZ) #280, through the Idaho Manufacturing Alliance; FTZ imports are not subject to duty or customs fees. Located outside Caldwell Executive Airport in the Sky Ranch Business Park, the Foreign Trade Zone helps local businesses and international businesses to streamline costs and operations.

For example, if the imported product or materials are further assembled or altered within the FTZ and shipped somewhere in the US, customs or duty fees are only required on the final product that goes out. If the product (or altered product) is re-exported, the product continues to not be subject to customs or duty fees. The ammunitions industry benefits from the FTZ, as an example of an industry that may import raw materials and then manufacture and sell them within a different form.

City officials hope to expand the number of companies utilizing the Foreign Trade Zone and noted that Canadian companies have reached out to Caldwell to express interest in working within the FTZ.

The December 2025 Canyon County unemployment rate is 3.4%.<sup>18</sup>

US Census Data American Community Survey (ACS) 2024 data shows that the industries with the highest workforce employment are Educational services, and health care and social assistance (23.4%); Retail trade (16.1%); Construction (13.1%); Professional, scientific, and management, and administrative and waste management services (9.2%); Arts, entertainment, and recreation, and accommodation and food services (9.2%); and Manufacturing (9.0%).

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<sup>18</sup> [https://datacommons.stanford.edu/tools/visualization?#visType%3Dmap%26place%3Dcountry%2FUSA%26placeType%3DCounty%26sv%3D%7B%22dcid%22%3A%22UnemploymentRate\\_Person%22%7D](https://datacommons.stanford.edu/tools/visualization?#visType%3Dmap%26place%3Dcountry%2FUSA%26placeType%3DCounty%26sv%3D%7B%22dcid%22%3A%22UnemploymentRate_Person%22%7D)

**Caldwell Workforce by Industry (%) US Census ACS 2024**

<b>INDUSTRY</b>	<b>% Workforce</b>
Agriculture, forestry, fishing and hunting, and mining	1.6%
Construction	13.1%
Manufacturing	9.0%
Wholesale trade	4.1%
Retail trade	16.1%
Transportation and warehousing, and utilities	2.9%
Information	2.0%
Finance and insurance, and real estate and rental and leasing	2.9%
Professional, scientific, and management, and administrative and waste management services	9.2%
Educational services, and health care and social assistance	23.4%
Arts, entertainment, and recreation, and accommodation and food services	9.2%
Other services, except public administration	2.8%
Public administration	3.7%

Source: Census Table DP03

**By Class of Worker**

Per ACS 2024 estimates, 32.6% of people employed in Caldwell work in the Management, science, and arts occupations. The next largest group, those in Sales and office occupations, represent 21.4% of the working population.

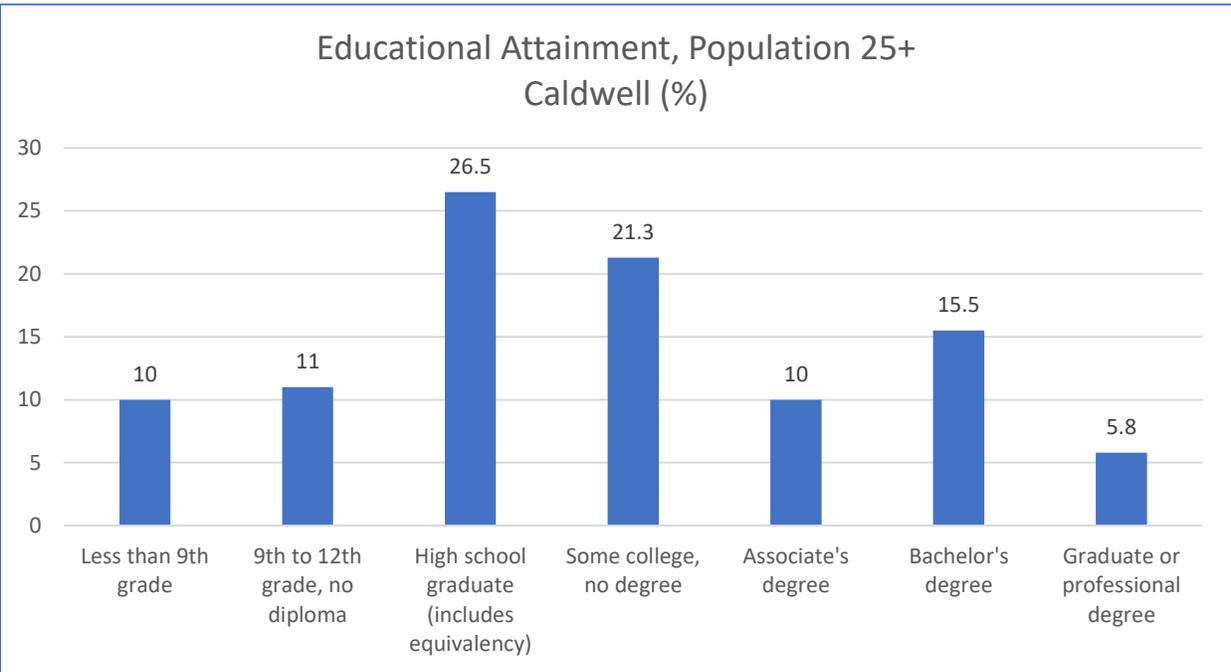
<b>Class of Worker</b>	<b>%</b>
Management, business, science, and arts occupations	32.6
Service occupations	18.3
Sales and office occupations	21.4
Natural resources, construction, and maintenance occupations	13.9
Production, transportation, and material moving occupations	13.7

Source: Census DP03

## D. WORKFORCE EDUCATIONAL & SKILL PROFILE

Per ACS 2024 estimates, 79.1% of Caldwell’s 25+ population has a high school diploma or higher, and 21.3% have a Bachelor’s degree or higher (vs. 87.7% and 23.2% in Canyon County and 91.9% and 31.8% statewide, respectively.)

The Caldwell population over 25 includes over 21% of residents with less than a high school diploma.



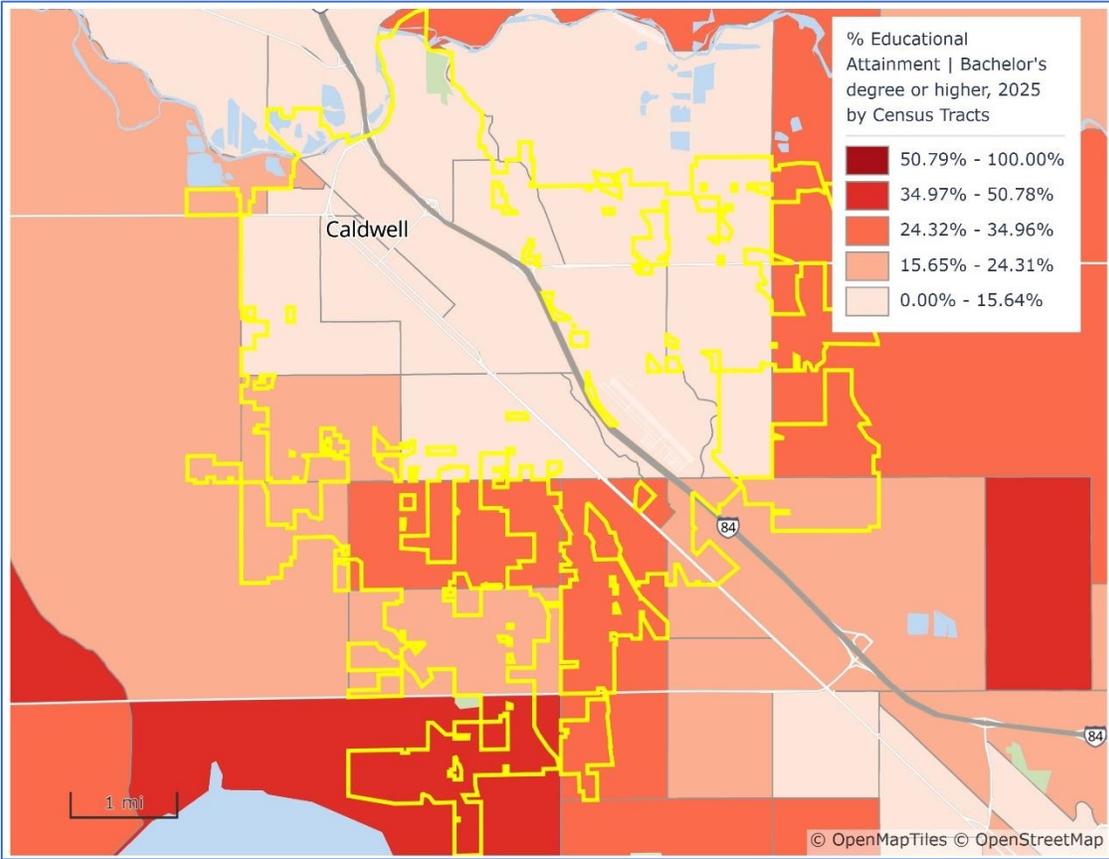
Source: Census S1501 for Caldwell, Quickfacts for Canyon County & Idaho data cited in narrative

Traditionally a community of blue-collar employment, Caldwell is now looking to build infrastructure for higher-skill jobs and for small businesses seeking to grow in the Treasure Valley. Local officials report that the community workforce has strong skills in the areas of welding, manufacturing and labor-intensive industries, but that local employers report a shortage of higher-end technology and engineering skills.

Caldwell has conducted a feasibility study to identify opportunities for incubator spaces focused on the food processing or Agribusiness field. Further, Micron Technologies, headquartered in Boise, is expected to invest \$15 billion to build new semiconductor fabrication plants, leading to a need for more area employees with high-end engineering skills.

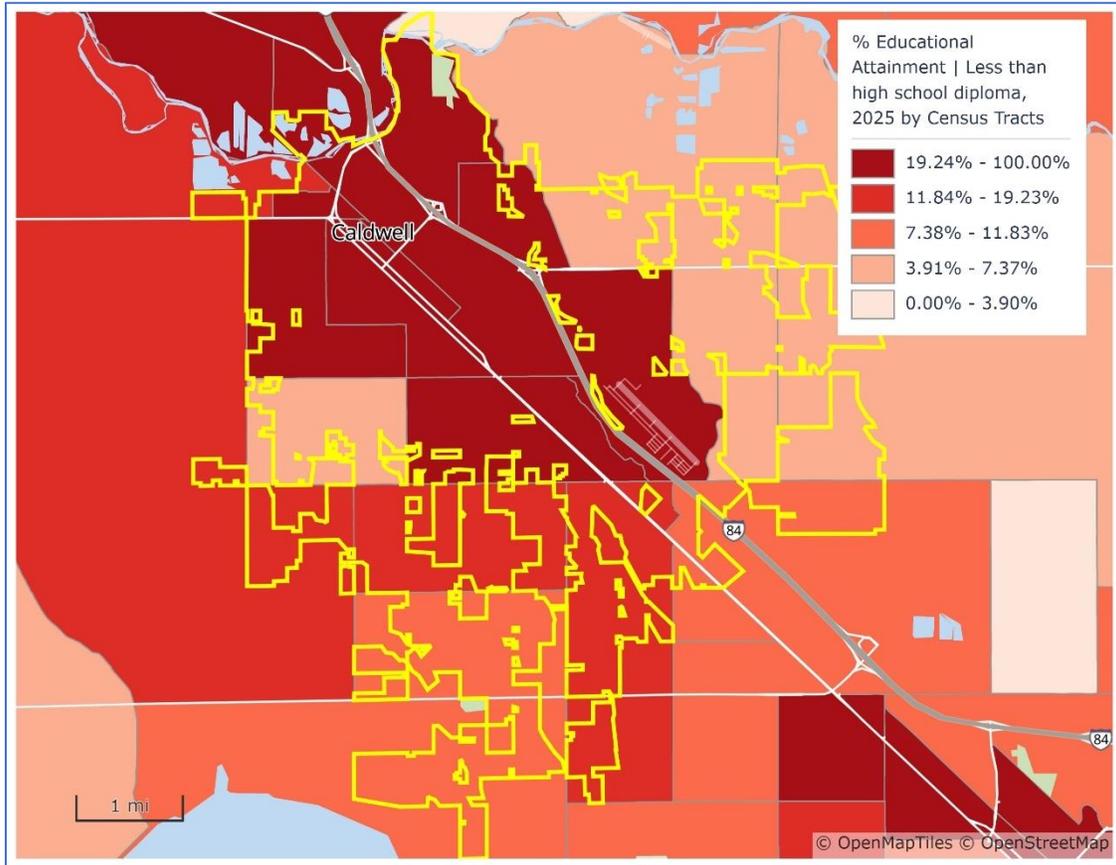
### Educational Attainment – Bachelor’s Degree or Higher by Census Tract

As the map below shows, the areas with the lowest shares of residents with bachelor’s degrees tend to be in the northwestern and central parts of the City, with higher rates at the very northeast of the City or southwestern Caldwell.



**Educational Attainment – Less than a High School Diploma by Census Tract**

Similarly, the highest shares of residents with less than a high school diploma are in also in the central and northwestern areas of Caldwell, overlapping with some Hispanic/Latino neighborhoods.



## E. HOUSING MARKET PROFILE

Per City officials, Caldwell has historically been recognized as one of the most affordable communities within the Treasure Valley. People moving to Caldwell in the past have done so for the relatively affordable housing opportunities. More recent waves of new residents include those seeking a higher quality of life, for whom affordability is not as significant an issue. As a result, officials have noted that household incomes are rapidly increasing and housing affordability is becoming a greater problem for longtime residents or those households in the earlier waves of migration.

According to City officials, the National Low Income Housing Coalition partnered with Caldwell in 2024 to assess housing affordability and concluded that the City was short 2,000 units of affordable housing.

Most new development is of single family homes in the \$400,000-\$500,000s range, which, as one school official suggested, does not reflect the reality of the families he serves. Any affordable housing, the official noted, tends to be on the outskirts of the community, making it difficult for families to get to centrally-located schools and other services and amenities.

In a focus group, one affordable housing developer noted that they have a waitlist of 250 people, and that the waitlist has been very long for 15 years. The developer has a proposal for 28 units of housing for seniors 62 and above.

Local developers continue to build some affordable housing through federal programs. Utilizing low-income housing tax credits, Domes Church Apartments will offer 152 one- to four bedroom units for families earning between 30% and 80% AMI. A three bedroom apartment would average around \$1,387/month; families would need to earn \$55,000 in order to spend less than 30% of monthly income on rent.

Additionally, the Idaho Housing and Finance Association, which awards tax credits through a competitive application process, has awarded tax credits to two Canyon County apartment developments with 60% AMI limits: Prospector Pointe Apartments in Caldwell and White Pines Apartments in Nampa, each with more than 260 units.<sup>19</sup>

The city of Caldwell annexed Farmway Village allowing it to help with adding more affordable housing options to the in-demand area that provides housing for some of Canyon County's farm laborers. In the summer, the Farmway Village population ratchets up to 1,400 people. Caldwell's

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<sup>19</sup> (<https://www.idahostatesman.com/news/local/community/canyon-county/article286244690.html#storylink=cpy>); <https://lmi.idaho.gov/around-southwestern-idaho-economic-activity-august-2025/>

Urban Renewal Area is the entity that will now invest in more units for these workers now that the annexation is complete.<sup>20</sup>

### **Shortage of Housing**

As in many jurisdictions in Idaho and around the country, Caldwell has a shortage of attainable, affordable housing for low- and moderate-income households, for starter homes, for people on fixed incomes, and for essential but lower-paid workers. As the area attracts more people seeking lower-cost housing, demand increases housing costs for all residents and particular those on fixed incomes.

Housing of all sizes is needed. While young people and seniors may seek out studio or one-bedroom housing, single parents with children may need 2- or 3-bedroom units.

Public housing officials suggest that, citywide, a shortage exists for 1-2BR units for low- or moderate-income households. As several City officials noted, finding affordable housing for households with 60%AMI or less is nearly impossible in Caldwell. One nonprofit, NeighborWorks Boise works to fill this gap by offering homebuyer education, down payment assistance, and renter and homeowner programs to households throughout the Treasure Valley.

For extremely low-income households, there is very little housing. Public housing officials suggested that, because extremely low-income households may need additional services to achieve stability and success, these developments are very difficult for developers financially; developers don't feel they can get a return on their investment and don't want to deal with federal financing issues. One official felt that extremely low-income people are very likely to be homeless in Caldwell.

City officials noted that a company in Nampa, Autovol, makes modular housing using robotics to construct affordable multi-family apartment buildings. While the company ships product to California and Wyoming, it generally doesn't serve Idaho markets because the zoning and building rules change from jurisdiction to jurisdiction.

### **Lack of Accessible Housing**

Per the State of Idaho's 2022-2027 Analysis of Impediments to Fair Housing, around 6% of the state's population has an ambulatory disability, but less than 1% of the state's housing stock is estimated to be accessible. State residents with a disability are more likely to live in housing that is in substandard condition, live in overcrowded housing, and face significant cost burdens than those without disabilities. (Idaho Fair Housing Forum)

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<sup>20</sup> KTVB News <https://lmi.idaho.gov/around-southwestern-idaho-economic-activity-august-2025/>

Approximately 53% of Idaho’s housing stock in 2019 was built before the Fair Housing Act’s accessibility requirements were implemented in 1991, and thus most homes are not designed with accessibility features.<sup>21</sup>

Nationwide, the Census Bureau’s National Housing Survey (NHS) reports that 48 million households (39%), have at least one person age 65+, a person with a disability, or both. About 1 in 8 households have a family member who uses a mobility device for a long-term condition. Nonetheless, only 5% of U.S. homes have a ramp, and 54% have a step-free entryway.<sup>22</sup> The NHS does not report data for Idaho homes.

## Increasing Home Prices and Rents

Caldwell home sale prices were down 1.0% in October 2025 from 2024; Redfin classifies the Caldwell housing market as Somewhat Competitive. From October 2020 to October 2025, median home prices increased from \$294,567 to \$385,990, an increase of over 31%.

On average, homes in Caldwell sell after 61 days on the market compared to 73 days last year. There were 127 homes sold in October 2025, down from 143 last year (an 11.2% drop). (<https://www.redfin.com/city/3170/ID/Caldwell/housing-market>)

Per Zillow, the most expensive neighborhoods in Caldwell are West Cloverdale, with a median home value of approximately \$556,000. (<https://www.zillow.com/home-values/30691/caldwell-id/>)

To illustrate the challenges of high rental costs, the National Low Income Housing Coalition estimates that a worker would need to earn \$35.35 per hour to afford a fair market 2-bedroom apartment in Canyon County (\$1,838).

That is, a minimum wage worker would need to work 4.9 jobs to afford a 2- bedroom home at the market rate. Caldwell workers in many fields do not earn \$35.35 per hour, including Office and Administrative Support Workers, Cashiers, Childcare Workers, Food Preparation Workers, Physical Therapist Aides, Home Health Aides and Personal Care Aides, Multiple Machine Tool Setters, and Healthcare Support Workers.<sup>23</sup> As noted elsewhere in this report, Caldwell rents tend to be lower than most neighboring communities’ rents, but are still high for many workers.

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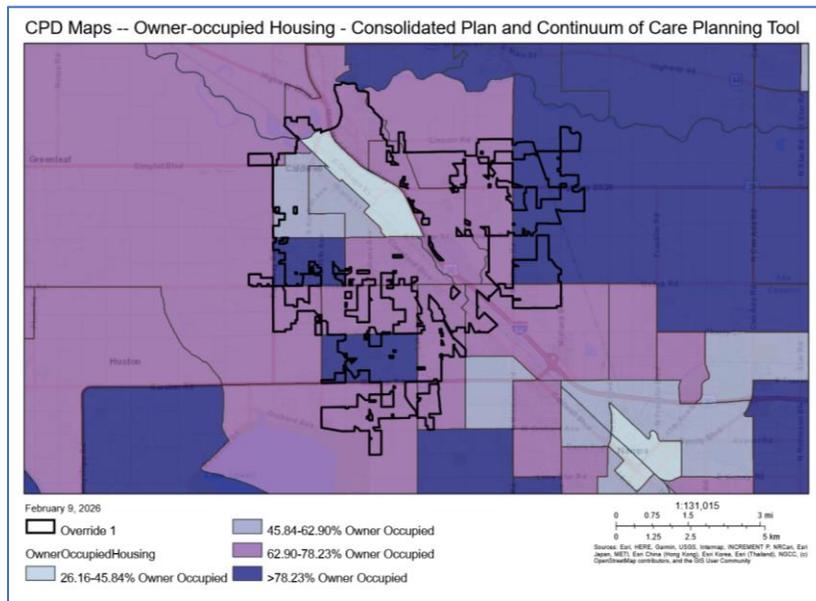
<sup>21</sup> <https://commerce.idaho.gov/content/uploads/2022/03/2022-Idaho-Analysis-of-Impediments-to-Fair-Housing-choice.pdf>

<sup>22</sup> <https://www.census.gov/content/dam/Census/library/visualizations/2021/demo/AHS-Home%20Accessibility%202021.pdf>

<sup>23</sup> National Low Income Housing Coalition 2025 (<https://nlihc.org/oor>, Wages per 2023 BLS estimates)

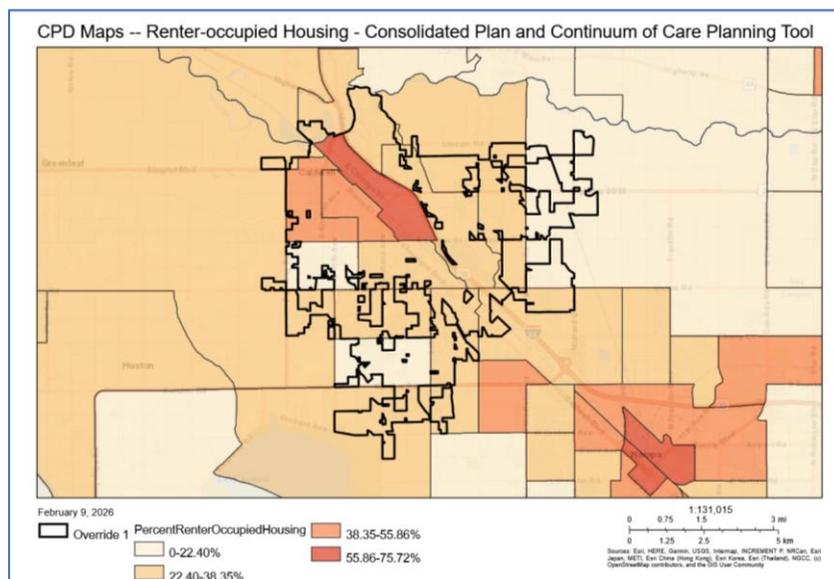
## Owner Occupied Housing

Large areas of Caldwell have upwards of 45.84-78.23% owner-occupied housing, with tracts in the western center and southern section of Caldwell exceeding 78%. In the northwestern section of the City, including the area overlapping the R/ECAPS area and Urban Renewal Area, under 45% of housing is owner-occupied.



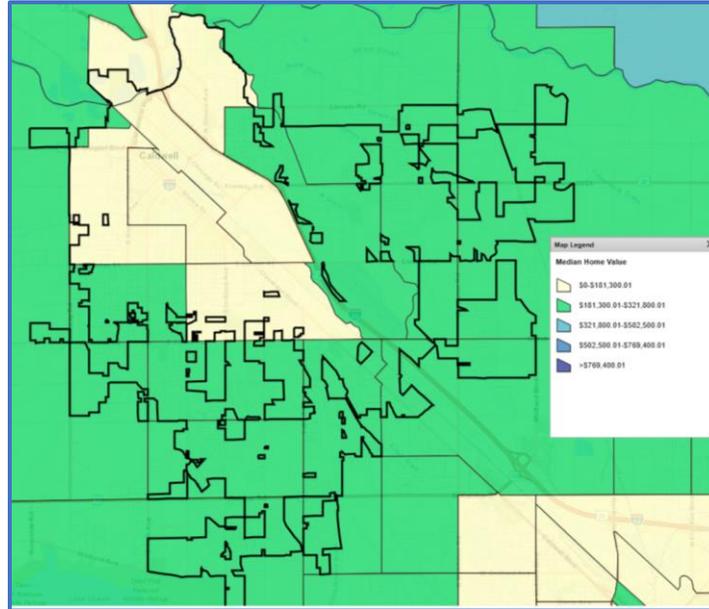
## Renter Occupied Housing

Conversely, the highest percentage of renter-occupied housing is in the northwest part of the city, overlapping in part with the R/ECAPS area and Urban Renewal Area.



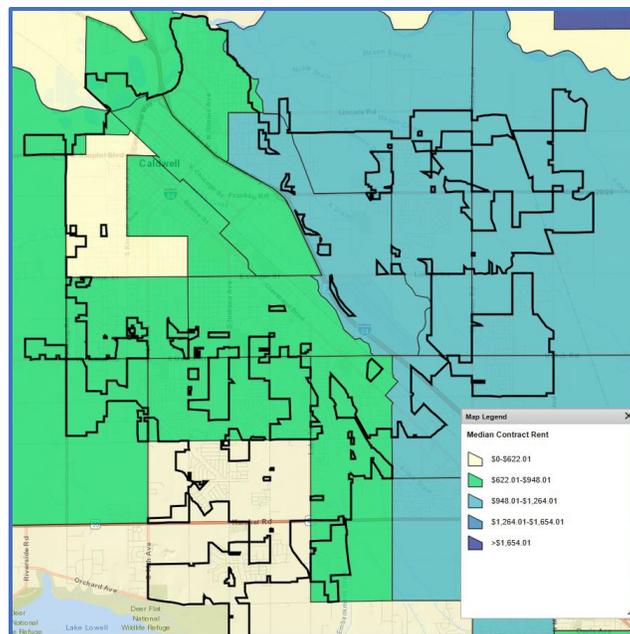
## Median Home Value

The tracts with the highest median home value are primarily located in the east, northeast and southwest of Caldwell, overlapping with some tracts that have a high population of residents identifying as White. Per the US Census, the median value of an owner-occupied home in Caldwell is \$367,300.



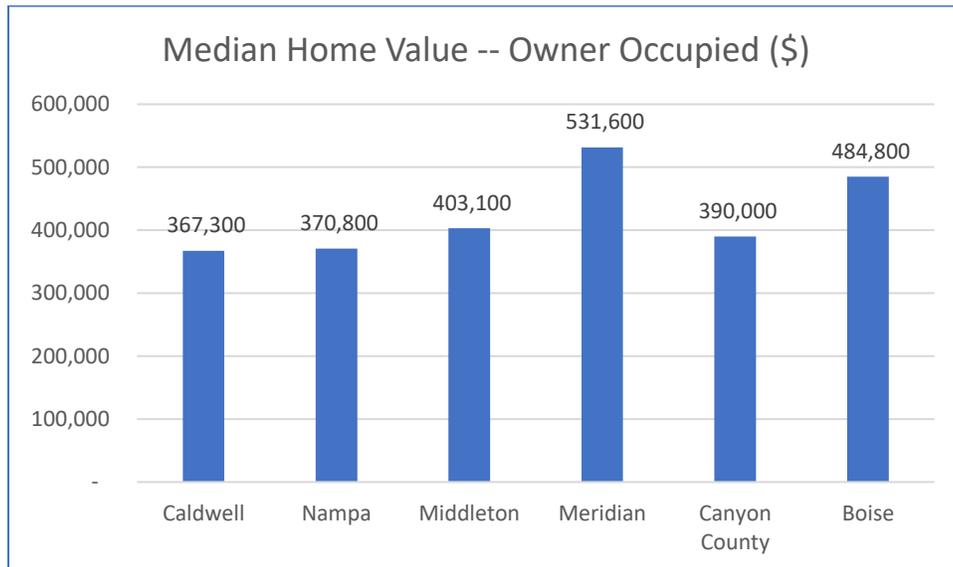
## Median Contract Rent by Census Tract

Across most of eastern Caldwell, the median contract rents range from \$948.01-\$1,264.01. Rents tend to be lower than \$622.01 on the northwestern and southwestern parts of the city.



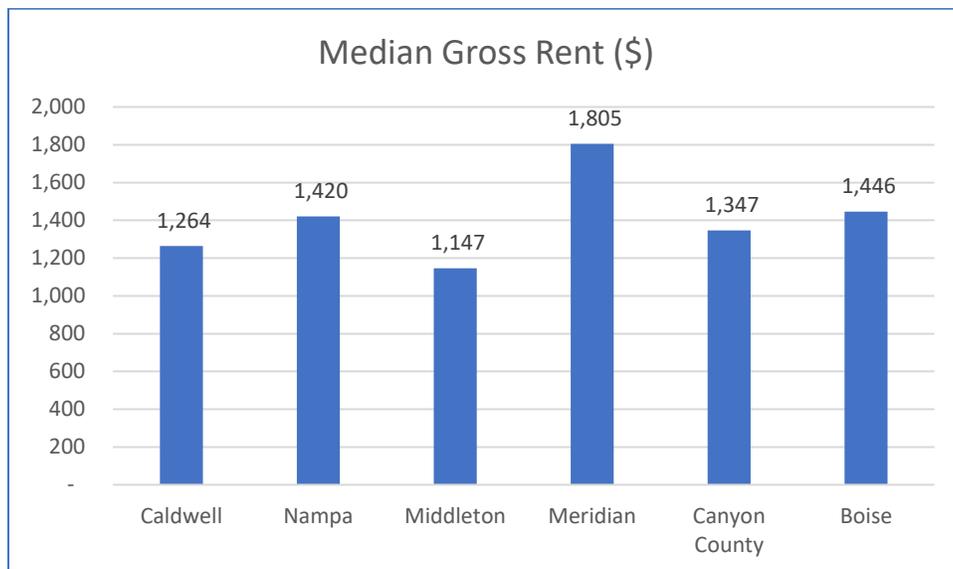
### Caldwell Home Costs vs Neighboring Communities

Caldwell home prices are competitive within nearby communities for which Census data is available. Per the US Census, Caldwell's median value of owner-occupied homes is over \$160,000 lower than that of Meridian, and more than \$110,000 lower than Boise.



### Caldwell Rental Costs vs Neighboring Communities

In a similar pattern to home values, Caldwell median rents are lower than nearby cities and the county overall, with the exception of Middleton.



### *Potential Impediment to Fair Housing Choice – High Cost of Housing*

Like much of the country, the City of Caldwell has seen housing prices increase significantly over the last decade, creating challenges for people on fixed incomes, and those looking for starter homes. City officials feel the most cost-effective way to support affordable housing is to focus on preserving existing stock through repairs and renovations; assist qualifying homeowners with downpayment assistance; and to continue to seek opportunities to work with developers to build affordable housing units.

**RECOMMENDATION:** The City’s approach of working with developers to build housing stock while helping preserve existing stock has become an important strategy in many communities around the country. While the City has no control over the housing market, Caldwell can continue its work with developers, landlords, and residents to try to increase access to Fair Housing Choice. Caldwell has made multiple efforts to incentivize developers, including supporting developers who seek LIHTC funding through the state.

## F. Housing Condition

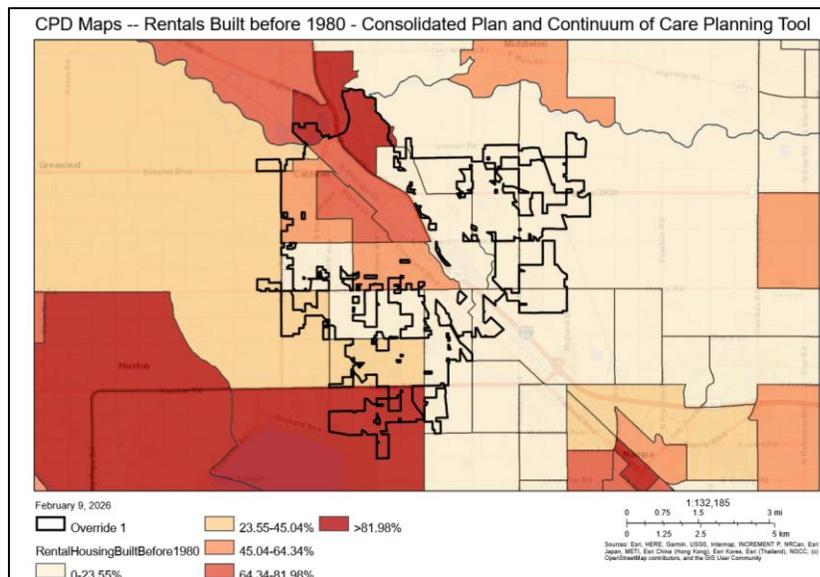
According to the US Census, the city was home to 21,765 housing units in 2023, comprised of 15,705 owner-occupied and 6,060 renter-occupied units. (Census Table DP04)

As the table below shows per 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data, 57% of owner-occupied housing and 35% of renter-occupied housing was built since 2000, although some new housing built in the last five years would increase these totals. Nonetheless, 28% of owner homes were built before 1980, as well as 38% of renter homes; this represents those homes most likely to need rehabilitation.

### Year Unit Built (2016-2020 CHAS)

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	6,695	57%	2,035	35%
1980-1999	1,740	15%	1,565	27%
1950-1979	2,155	18%	1,660	29%
Before 1950	1,130	10%	500	9%
<b>Total</b>	<b>11,720</b>	<b>100%</b>	<b>5,760</b>	<b>100%</b>

In most Census tracts, less than 23.55% of rental housing was built before 1980. Rental housing built before 1980 is predominantly in the northwest quadrant of the city.



## HOUSING CONDITION: HOUSING PROBLEMS

HUD utilizes the following definitions of Housing Problems and Severe Housing problems.

### HOUSING PROBLEMS

- 1) housing unit lacks complete kitchen facilities;
- 2) housing unit lacks complete plumbing facilities;
- 3) household is overcrowded; and
- 4) household is cost burdened

### SEVERE HOUSING PROBLEMS:

- 1) kitchen or plumbing problems above AND
- 2) Severely overcrowded OR
- 3) housing cost burden >50%

The City's older housing stock can lead to higher shares of housing problems. Per 2016-2020 CHAS data, 21% of Caldwell owner-occupied and 50% renter occupied housing has one selected condition, which equals 2,495 owner-occupied and 2,900 renter-occupied homes. Another 70 owner-occupied and 100 renter-occupied homes have two conditions.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	2,495	21%	2,900	50%
With two selected Conditions	70	1%	100	2%
With three selected Conditions	0	0%	20	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	9,165	78%	2,745	48%
<b>Total</b>	<b>11,730</b>	<b>100%</b>	<b>5,765</b>	<b>100%</b>

For people with incomes of 30% of HUD Area Median Family Income (HAMFI) or less, more than 86% have severe housing problems in some census tracts, which, in addition to the housing problems previously discussed, can include severe overcrowding or spending 50% or more of monthly incomes on housing costs.

As the map below indicates, high levels (57.5% or more) of severe housing problems for extremely low-income households exist in many areas of Caldwell. The high levels of severe

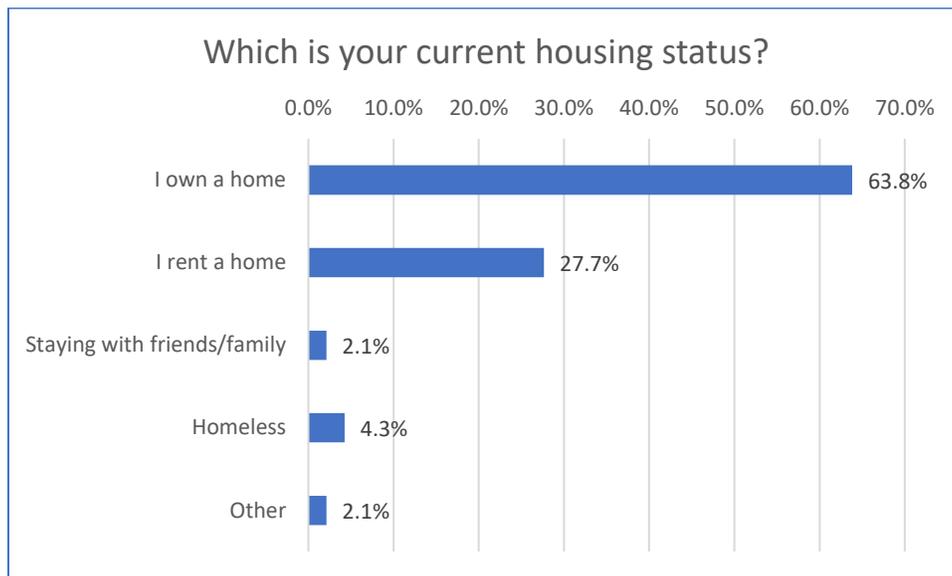


### III. Public Outreach -- Fair Housing Survey Results

As part of Caldwell’s Consolidated Planning efforts, a community survey asked detailed questions about residents’ experiences with Fair Housing concerns, as well as their knowledge of Fair Housing laws and resources.

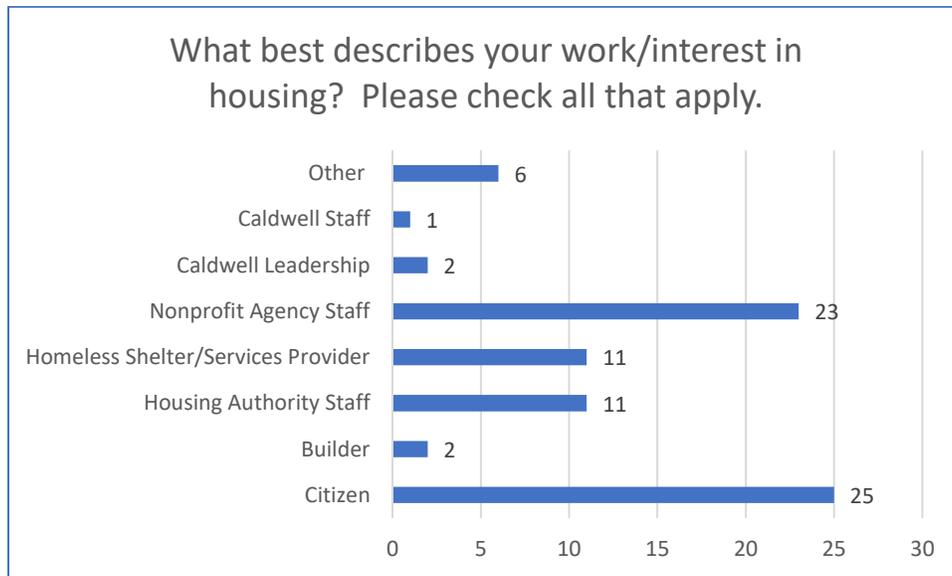
#### A. Respondent Profile

Within the community survey, almost 2/3 of respondents were homeowners, with about 28% renters, 2.1% responding “Staying with Friends/Family,” 4.3% of respondents reported being homeless, and 2.1% responding “Other.” The people responding Other commented “Parsonage provide by The Salvation Army,” and “to(o) expensive.”



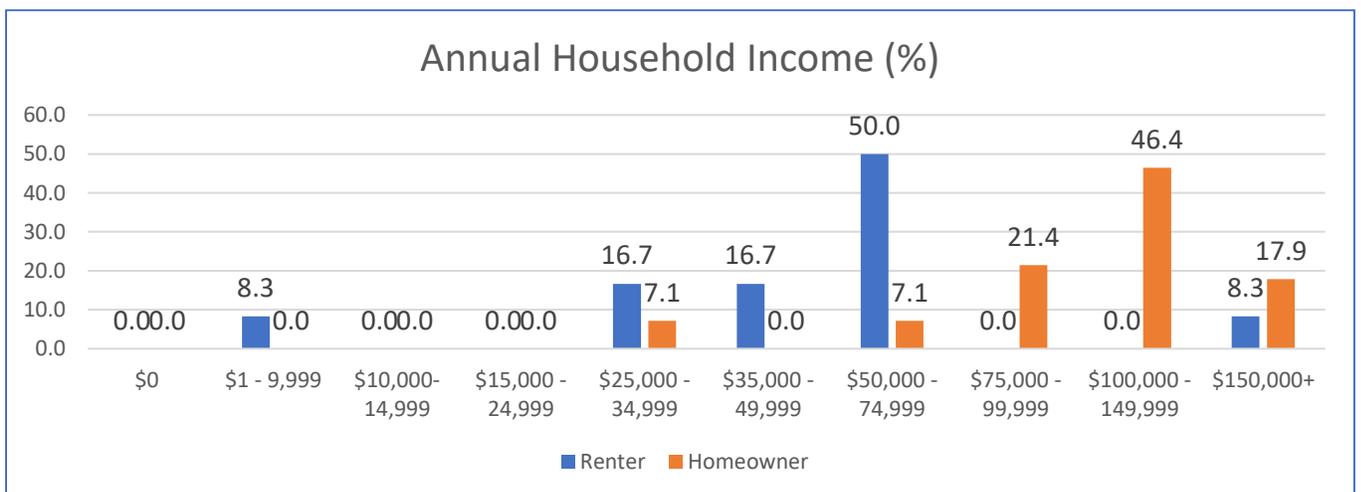
### Work/Interest in Housing

In terms of their relationship to housing, respondents could choose more than one response. Twenty-five identified as Caldwell Citizens, with 23 identifying as Nonprofit Agency Staff. Another 11 represented Housing Authority Staff, and 11 identified as Homeless Shelter/Services Providers. Among those who responded “Other,” answers were “School Counselor,” “Local Health Department Staff,” “Low Income,” “Rapid Rehousing,” “IDHW Staff,” “School District—Community School Coordinator.”



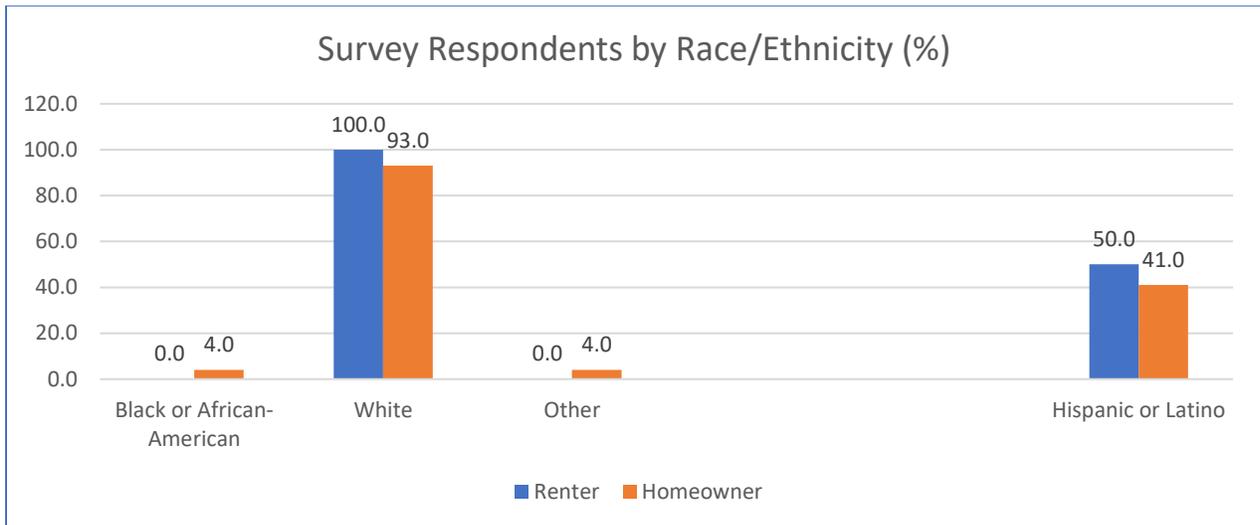
### Annual Household Income

Over 64 percent of homeowner respondents report household incomes of \$100,000 or more. Twenty five percent of renter respondents had incomes below \$35,000.



### Race/Ethnicity of Survey Respondents

One hundred percent of renters and 93% of homeowners respondents reported their race as White. Another 4% of homeowners reported their race as Black or African American, and 4% reported their race as Other, with one respondent commenting “Brown.” One half of renters and nearly 41% of homeowners reported Hispanic/Latino ethnicity.



### Ranking Housing Needs

When asked to rank different housing supports on a scale of 1-3, with 3 being High Need, 2= Moderate Need, and 1=Low Need, respondents ranked Affordable Housing first, followed by Housing for Seniors and Housing for Veterans. As can be seen below, respondents also highly ranked other housing supports for homeowners, people with special needs, and those seeking to become homeowners, as well as a need for single family housing.

Housing Need	Rating
Affordable Housing	2.75
Housing for Seniors	2.71
Housing for Veterans	2.7
Owner-occupied Home repair assistance	2.55
Housing for Residents with Special Needs	2.54
Single Family Housing	2.54
Homeownership Assistance	2.52

## B. Experiences with Discrimination

Respondents were asked questions related to their experiences (or in some cases, to the experiences of people they know) with potential housing discrimination, their knowledge of Fair Housing Laws, and their knowledge of how to file a Fair Housing complaint.

As the analyses “slice” the data by different subpopulation categories – for example, homeowners and renters, by race – and because fewer respondents completed this section of the survey, we have smaller sample sizes within particular groups, making it difficult, if not impossible, to draw definitive conclusions.

Therefore, our analysis looks at trends for the entire respondent population, with a second set of analyses for those respondents identifying as Hispanic/Latino or not Hispanic/Latino.

Overall, about 2/3rds of respondents had not experienced or known directly of most instances of discrimination, but a sizable share had experienced discrimination or believed that they had but weren’t sure. However, about half of respondents cited experience with predatory lending or other discriminatory banking practices.

The first set of analyses, about people’s experiences with discrimination, asked respondents to answer in the following categories:

- YES
- NO
- I think so, but not sure
- Do Not Know

The charts below show the number of respondents who answered “Yes” or “I think so, but not sure.”

Another set of questions related to awareness of fair housing situations and ways to try to resolve them offered respondents the options of:

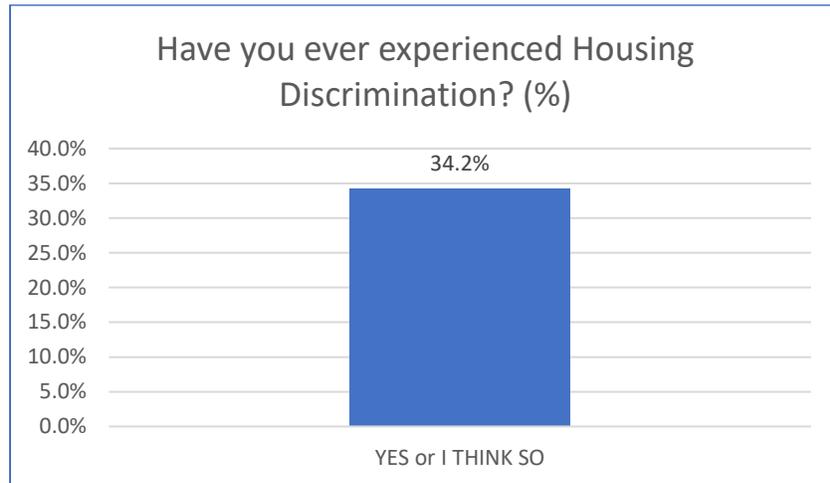
- YES
- NO
- I think so, but not sure

PLEASE NOTE: The analyses/charts accompanying these analyses exclude respondents who left the question blank.

## EXPERIENCES WITH HOUSING DISCRIMINATION – ALL RESPONDENTS

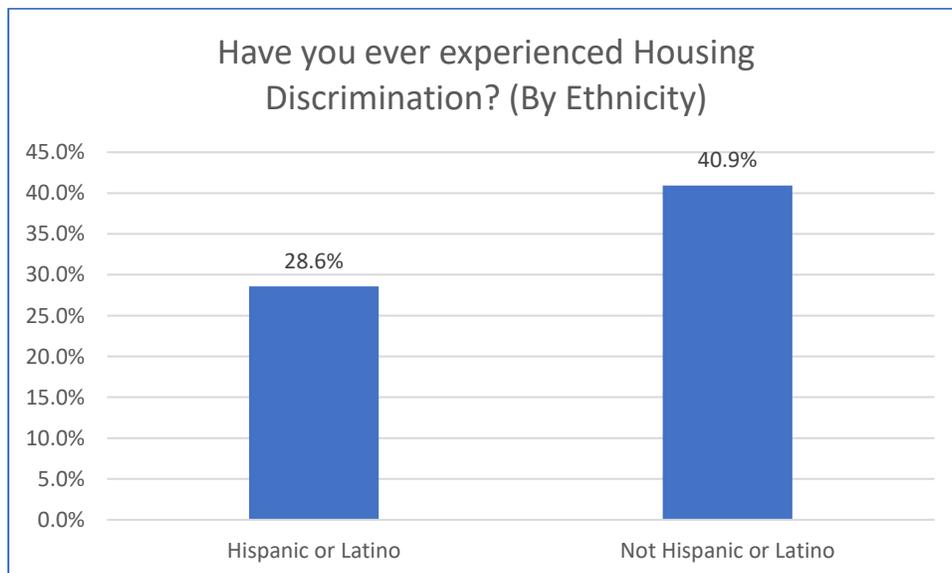
To the question, “Have you ever experienced Housing Discrimination,” 10 respondents said yes, while 3 respondents thought they had but they weren’t sure.

This represented 34.2% of those who responded to the question.



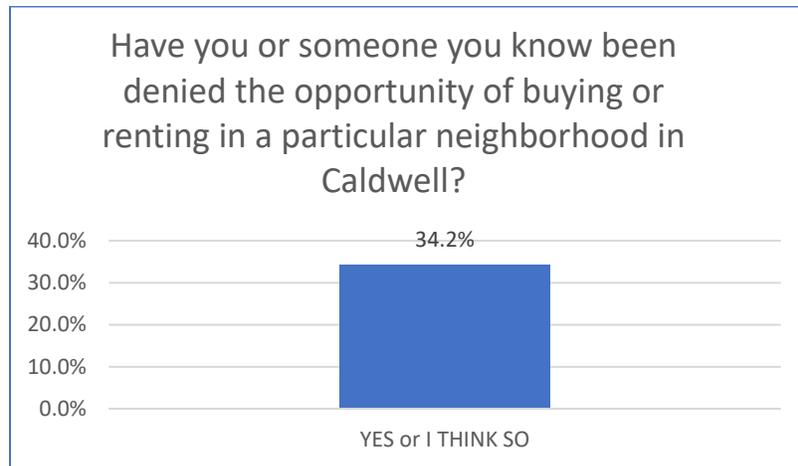
## EXPERIENCES WITH HOUSING DISCRIMINATION – BY ETHNICITY

To the question, “Have you ever experienced Housing Discrimination,” nearly 29% of Hispanic/Latino respondents said YES or “I think so, but not sure.” Nearly 41% of non-Hispanic or Latino respondents also reported being discriminated against.



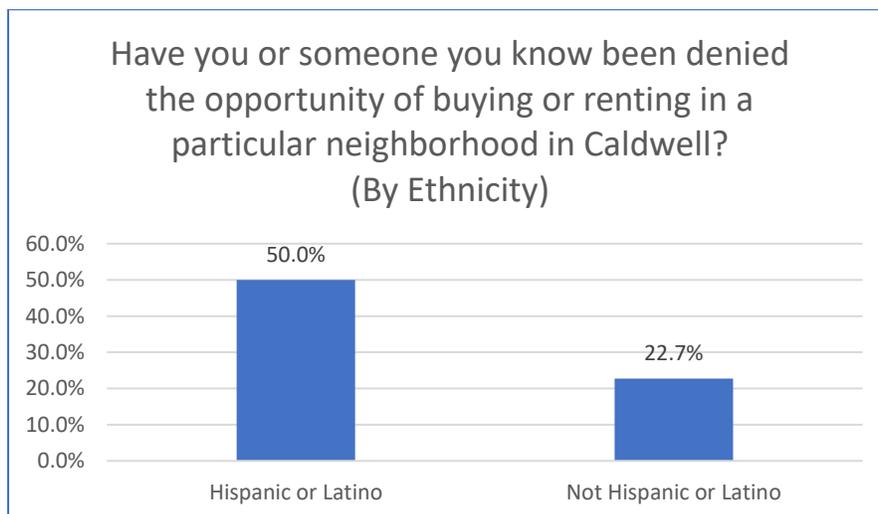
## EXPERIENCE IN BEING DENIED OPPORTUNITY TO RENT OR BUY IN PARTICULAR NEIGHBORHOODS – ALL RESPONDENTS

In terms of the question “Have you or someone you know been denied the opportunity of buying or renting in a particular neighborhood?” 11 respondents believed this to be true. Two responded, “I think so, but not sure.” This represented over one third of those who responded to the question.



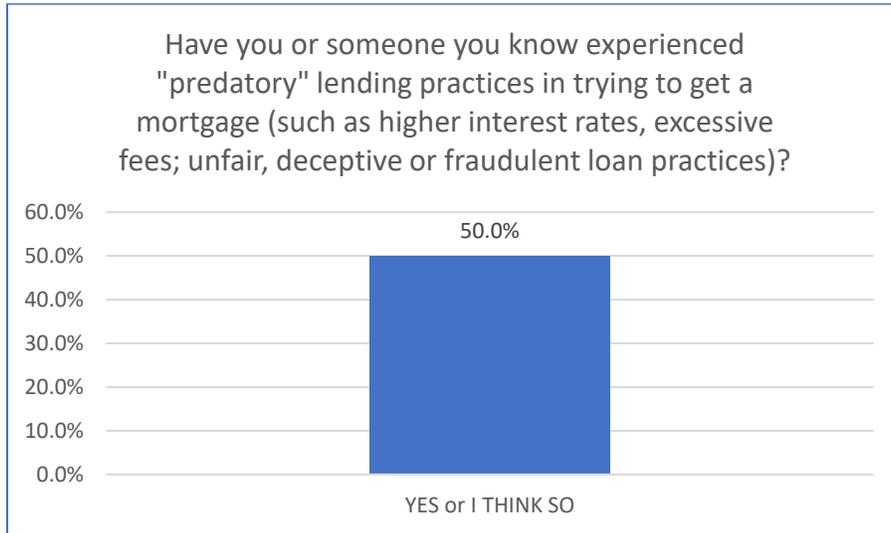
## EXPERIENCE IN BEING DENIED OPPORTUNITY TO RENT OR BUY IN PARTICULAR NEIGHBORHOODS – BY ETHNICITY

In terms of the question “Have you or someone you know been denied the opportunity of buying or renting in a particular neighborhood?” half of Hispanic/Latino respondents said YES or “I think so, but not sure.” Nearly 23% of non-Hispanic or Latino respondents also reported being denied the opportunity to rent or buy in particular neighborhoods.



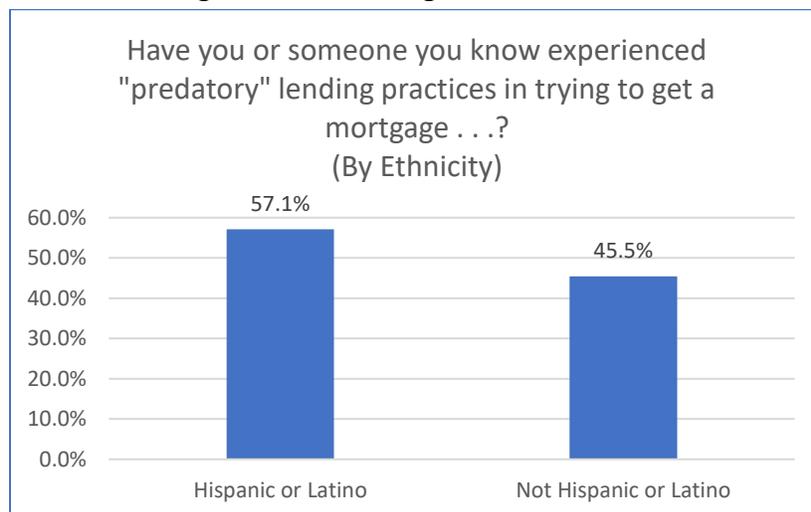
## EXPERIENCE WITH/KNOWLEDGE OF DISCRIMINATORY PRACTICES IN BANKING – ALL RESPONDENTS

In terms of bank lending practices, to the question “Have you or someone you know experienced "predatory" lending practices in trying to get a mortgage (such as higher interest rates, excessive fees; unfair, deceptive or fraudulent loan practices)?”, 16 responded yes, while 3 responded “I think so, but not sure.” This represented 50% of those who responded to the question.



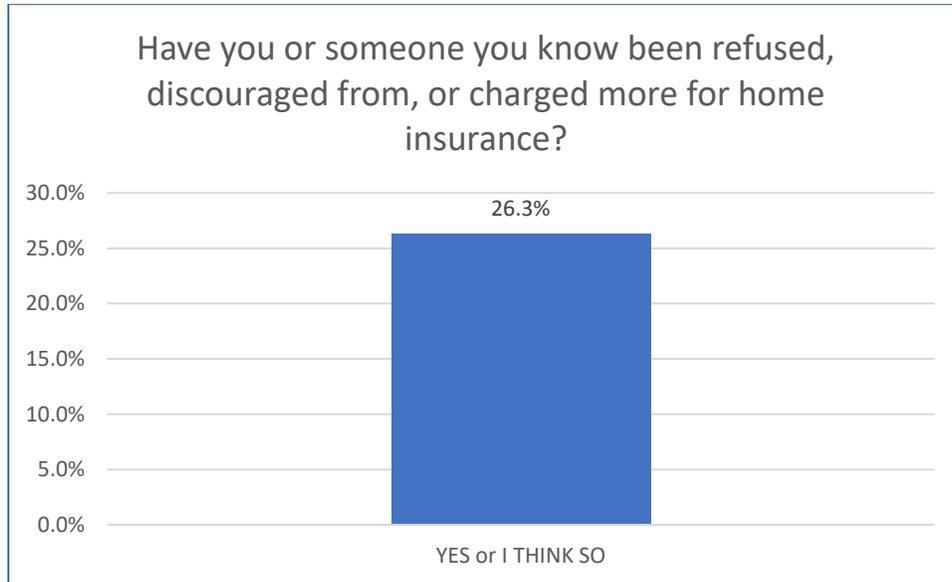
## EXPERIENCE WITH/KNOWLEDGE OF DISCRIMINATORY PRACTICES IN BANKING – BY ETHNICITY

In terms of bank lending practices, to the question “Have you or someone you know experienced "predatory" lending practices in trying to get a mortgage (such as higher interest rates, excessive fees; unfair, deceptive or fraudulent loan practices)?”, 57.1% of Hispanic/Latino respondents said YES or “I think so, but not sure.” Nearly 46% of non-Hispanic or Latino respondents also reported being discriminated against in a banking context.



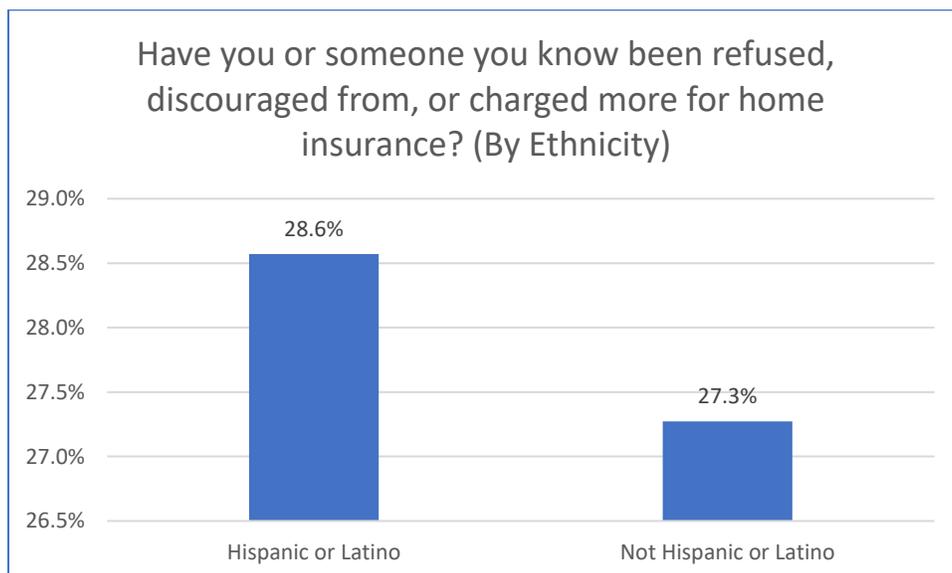
## FAIR HOUSING AND HOME INSURANCE – ALL RESPONDENTS

In response to the question, “Have you or someone you know been refused, discouraged from, or charged more for home insurance?”, 5 responded yes, while 5 responded “I think so, but not sure.” This represented 26.3% of those who responded to the question.



## FAIR HOUSING AND HOME INSURANCE – BY ETHNICITY

In response to the question, “Have you or someone you know been refused, discouraged from, or charged more for home insurance?”, 28.6% of Hispanic/Latino respondents said YES or “I think so, but not sure.” Over 27% of non-Hispanic or Latino respondents also reported being discriminated against in terms of home insurance.

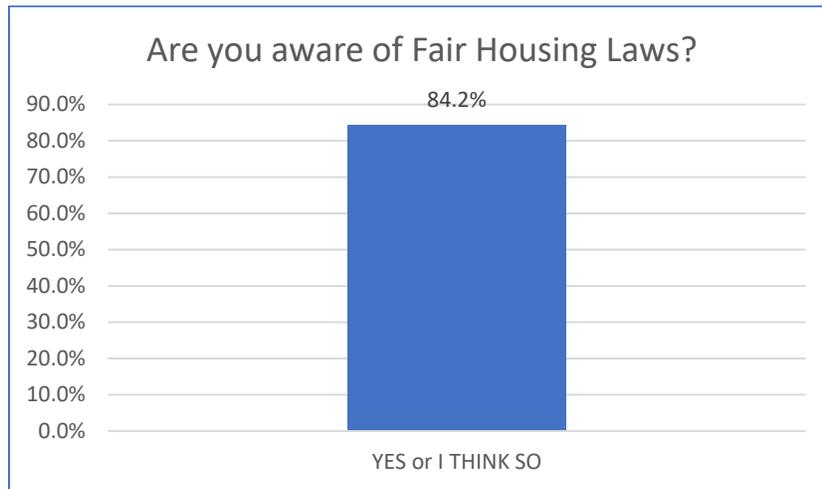


### C. Awareness and Likely Response to Fair Housing Situations

High shares of respondents were aware of Fair Housing Laws and likely to report violations.

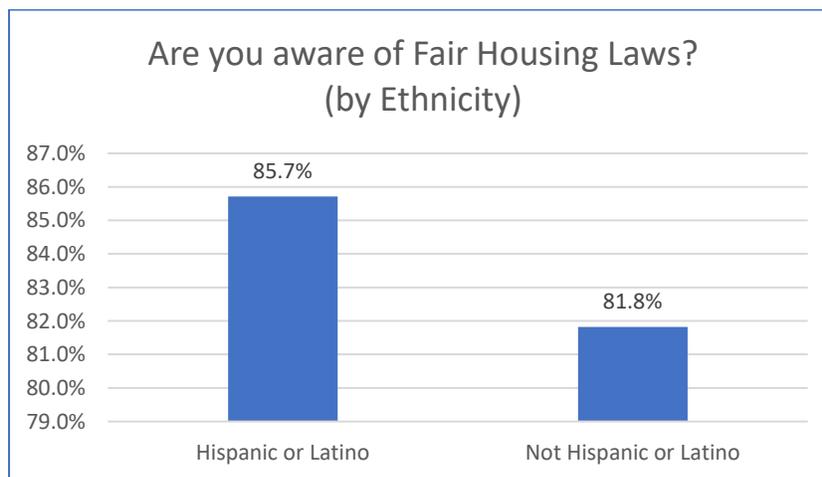
#### **AWARENESS OF FAIR HOUSING LAWS – ALL RESPONDENTS**

In response to the question, “Are you aware of Fair Housing Laws?”, 30 respondents said yes, while 2 respondents responded, “I think so, but not sure.” This represented 84.2% of those who responded to the question.



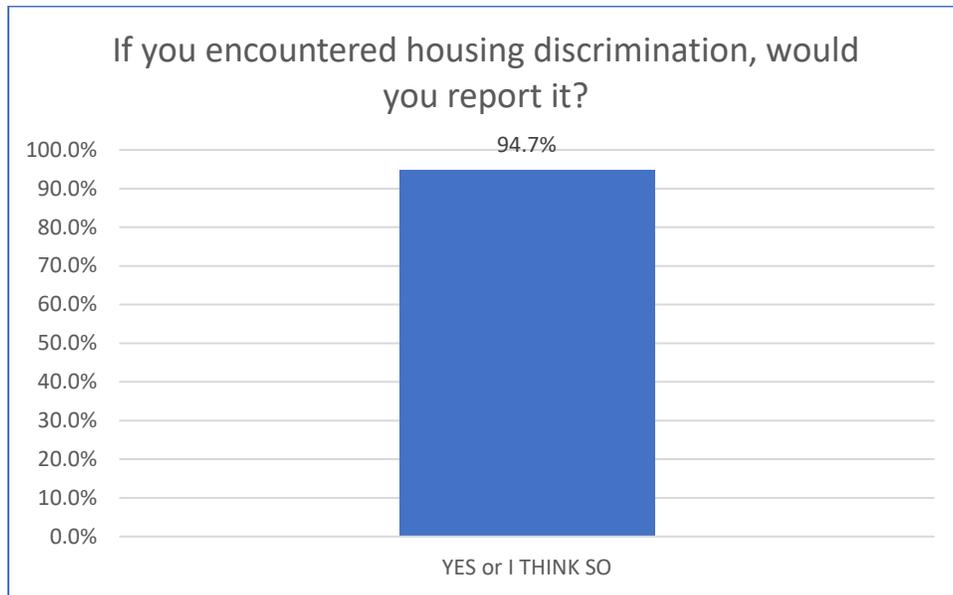
#### **AWARENESS OF FAIR HOUSING LAWS – BY ETHNICITY**

In response to the question, “Are you aware of Fair Housing Laws?”, nearly 86% of Hispanic/Latino respondents said YES or “I think so, but not sure.” Nearly 82% of non-Hispanic or Latino respondents also reported awareness.



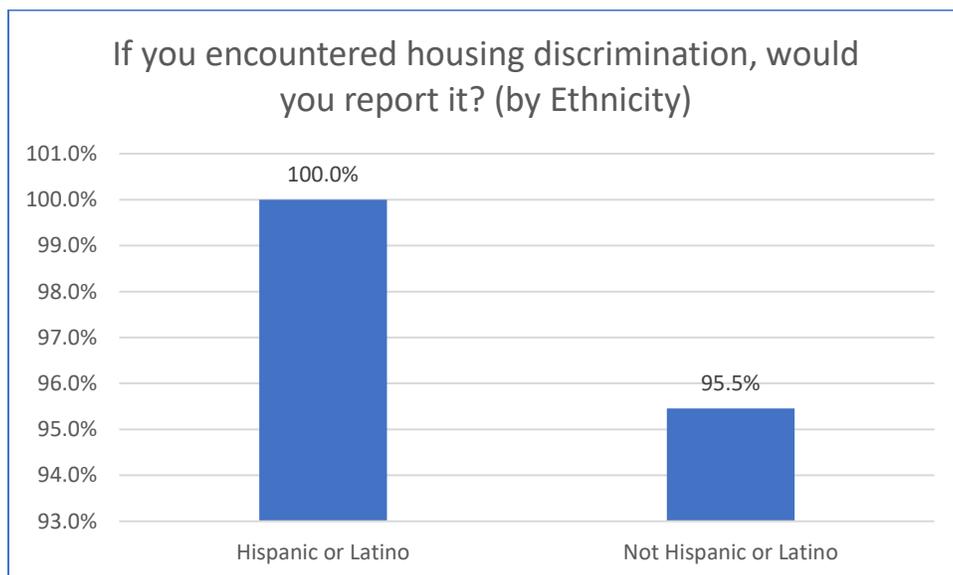
## REPORTING HOUSING DISCRIMINATION – ALL RESPONDENTS

In response to the question, “If you encountered housing discrimination, would you report it?”, 34 responded YES, and two responded “I think so, but not sure.” This represented 94.7% of those who responded to the question.



## REPORTING HOUSING DISCRIMINATION – BY ETHNICITY

In response to the question, “If you encountered housing discrimination, would you report it?”, 100% of Hispanic/Latino respondents said YES or “I think so, but not sure.” Nearly 96% of non-Hispanic or Latino respondents also reported they would report housing discrimination.

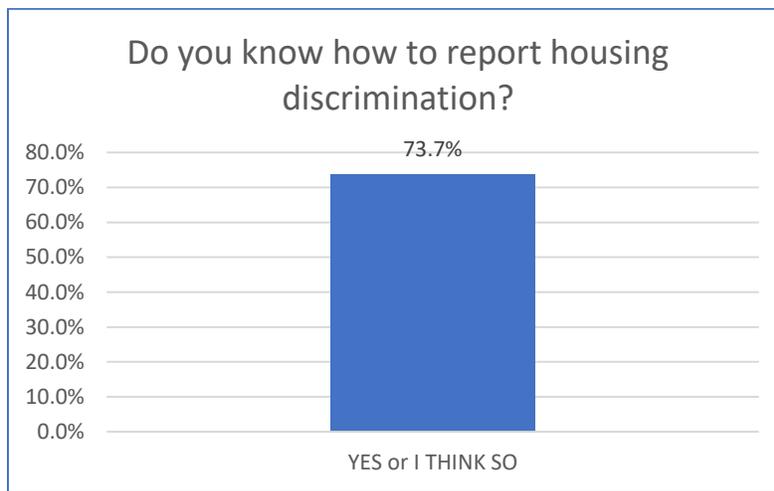


### D. Knowledge of How To Report Housing Discrimination

An opportunity exists to further educate community members further on how to report discrimination.

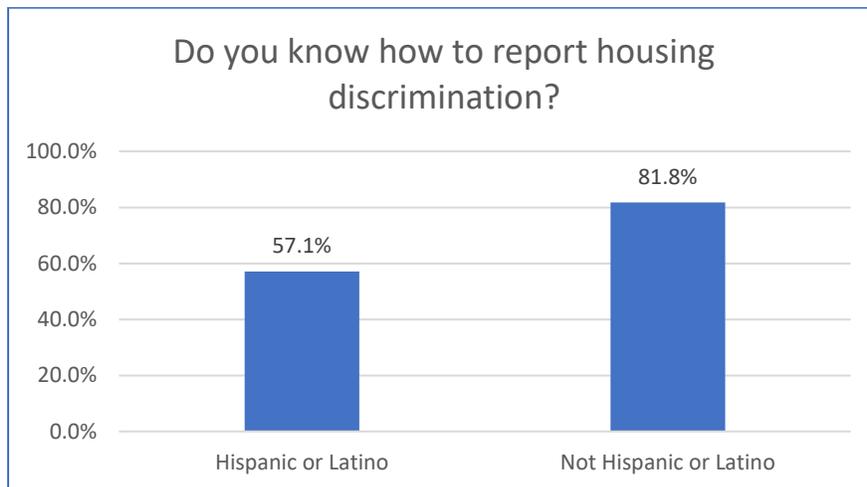
#### **KNOWLEDGE OF HOW TO REPORT HOUSING DISCRIMINATION – ALL RESPONDENTS**

In response to the question, “Do you know how to report housing discrimination?” 24 respondents said Yes, while four responded “I think so, but not sure.” This represented 73.7% of those who responded to the question.



#### **KNOWLEDGE OF HOW TO REPORT HOUSING DISCRIMINATION – BY ETHNICITY**

In response to the question, “Do you know how to report housing discrimination?”, 57.1% of Hispanic/Latino respondents said YES or “I think so, but not sure.” Nearly 82% of non-Hispanic or Latino respondents also reported knowledge of how to report discrimination.



## IV. Caldwell Fair Housing Activities and Resources

### A. CITY OF CALDWELL CURRENT FAIR HOUSING LEGAL STATUS: CONSENT DECREE

The City of Caldwell has no Consent Decrees.

### B. CITY OF CALDWELL FAIR HOUSING INFORMATION, RESOURCES, AND EDUCATION

In April, 2025, the Caldwell City Council passed Resolution 123-25, *“Restating that discrimination in the sale, rental, leasing, financing or housing or land to be used for construction of housing or in the provision of brokerage services because of race, color, religion, sex, or national origin is prohibited by Title VIII of the 1968 Civil Rights Act (Fair Housing Law.)*

The City publicized the resolution in order to *“encourage owners of real estate, developers, and builders to become aware of their respective responsibilities and rights under the Federal Fair Housing Law and amendments and any applicable state or local laws or ordinances.”*<sup>24</sup>

As previously noted, the Caldwell Housing Authority provides Fair Housing information and resource links to the community through its Occupancy Policy website page, available in both English and Spanish.<sup>25</sup>

Additionally, a coalition of Caldwell and other stakeholders are part of the Idaho Fair Housing Forum, a collaborative that provides education and outreach throughout Idaho. At various times, those collaboration members have included/include:

- Idaho Affordable Housing Management Association (AHMA)
- Agency for New Americans
- Boise City/Ada County Housing Authority
- Caldwell Housing Authority
- City of Boise
- City of Meridian
- City of Nampa
- City of Pocatello
- City of Idaho Falls
- City of Coeur d’Alene

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<sup>24</sup> <https://www.cityofcaldwell.org/files/assets/city/v/1/city-clerk/documents/title-vi/res-123-25.pdf>

<sup>25</sup> [https://chaidaho.org/occupancy-policy/#::~:~:text=The%20Caldwell%20Housing%20Authority%20\(CHA\)%20does%20not,certifications%20to%20the%20CHA%20within%2030%20days](https://chaidaho.org/occupancy-policy/#::~:~:text=The%20Caldwell%20Housing%20Authority%20(CHA)%20does%20not,certifications%20to%20the%20CHA%20within%2030%20days)

- Greater Idaho Falls Association of REALTORS®
- Idaho Association of REALTORS®
- Idaho Department of Commerce
- Intermountain Fair Housing Council
- Idaho Housing and Finance Association (host)
- Idaho Human Rights Commission
- Idaho Human Rights Education Center
- Idaho Legal Aid Services
- Idaho Office for Refugees
- Idaho Partners for Prosperity
- Idaho Chapter: National Association of Residential Property Managers (NARPM)
- Northwest Real Estate Capital Corporation
- Thomas Development
- Tomlinson and Associates
- U.S. Department of Housing and Urban Development

### *Potential Impediment to Fair Housing Choice – Lack of Awareness of Fair Housing Reporting Options*

As the Community Survey results indicated, Caldwell has made progress in raising awareness among all residents of Fair Housing Laws, with nearly 86% of Hispanic/Latino and 82% of non-Hispanic/Latino survey respondents reporting their awareness. One hundred percent of Hispanic or Latino residents surveyed, and nearly 96% of non-Hispanic or Latino residents, report strong interest in reporting complaints.

In terms of knowledge of How to Report a Complaint, a potential opportunity exists to increase education and awareness, perhaps in other languages. People of Hispanic/Latino ethnicity, for example, report lower rates of knowledge about how to report Housing Discrimination in Caldwell (57.1% vs. 81.8% of non-Hispanic/Latino respondents.)

**RECOMMENDATION:** The Caldwell City Council’s April 2025 Resolution 123-25 offers strong direction for the City in strengthening Fair Housing awareness among residents, owners of housing, realtors, builders, and others involved in the housing industry.

The City might consider providing additional Fair Housing educational materials in other languages on its website or in hard copy form throughout the community. The City may consider offering Fair Housing Education in conjunction with local events (e.g., community event) to increase dissemination of this knowledge.

## V. Fair Housing Complaints/Enforcement

Caldwell residents can file fair housing complaints through several different organizations, including HUD, the Intermountain Fair Housing Council (IFHC), Idaho Legal Aid Services, or the Idaho Commission on Human Rights.

Complaints are investigated, and the administrative agency can negotiate, mediate, resolve, or have a finding of no discrimination. If there is cause, the complainant has 20 days to go through the Administrative Law Judge, or to federal court with the Department of Justice or a private attorney. State claims have to go through the Idaho Human Rights Commission before they can go to the Federal Court.

For this analysis of the types of housing discrimination reported, the study team interviewed IFHC representatives and analyzed IFHC data regarding fair housing complaints received by the Council from January 1, 2023 through December 31, 2025.

Per IFHC, a few of the current trends found in Fair Housing work are included below, followed by the case information.

### **NEIGHBORHOOD COVENANTS**

The Fair Housing official noted that some Covenants, Conditions, and Restrictions (CCRs) are written to keep younger people, families with children, and people of color out of certain neighborhoods. For example, some communities try to convert to 55+ communities – and discriminate against familial structure -- by limiting fencing and play structures.

A coalition of Fair Housing officials, realtors, county clerks, and civil rights groups worked to address some of this discrimination by lobbying for Idaho to remove racially based restrictive covenants from property deeds by passing Senate Bill 1240 in 2022, which prohibited and removed discriminatory language based on race, ethnicity, or national origin.

The law aligns with the federal [Fair Housing Act](#) and prevents such covenants from appearing in new deeds. The official felt that residents need further education regarding the investment in their community through the promotion of diverse and vibrant neighborhoods.

### **PROPERTY MANAGEMENT PRACTICES**

In a class action suit, the Department of Justice sued several large national builders who also operate in the Treasure Valley for price fixing. As part of those practices, the developers were holding available units empty to raise prices and using Real Page software to share information and coordinate pricing. *“The amended complaint alleges the landlords — Greystar Real Estate Partners LLC (Greystar); Blackstone’s LivCor LLC (LivCor); Camden Property Trust (Camden); Cushman & Wakefield Inc and Pinnacle Property Management Services LLC (Cushman); Willow*

*Bridge Property Company LLC (Willow Bridge) and Cortland Management LLC (Cortland) — participated in an unlawful scheme to decrease competition among landlords in apartment pricing, harming millions of American renters. Together, these landlords operate more than 1.3 million units in 43 states and the District of Columbia.”<sup>26</sup>*

As a result of this suit, Fair Housing officials believe the rental situation may get more affordable for households throughout the Treasure Valley.

Additionally, some companies were forcing people with disabilities to come into the office to apply for rentals, rather than the option to apply online. In some cases, landlords were screening for service animals or assistance animals.

### **SOURCE OF INCOME/VOUCHERS**

The Fair Housing Official noted that throughout Idaho, prospective tenants offering vouchers and/or SSDI were denied in their housing applications. These tenants included people with disabilities who had co-signers.

The following section looks at the complaints received by the Intermountain Fair Housing Council from 2023-2025.

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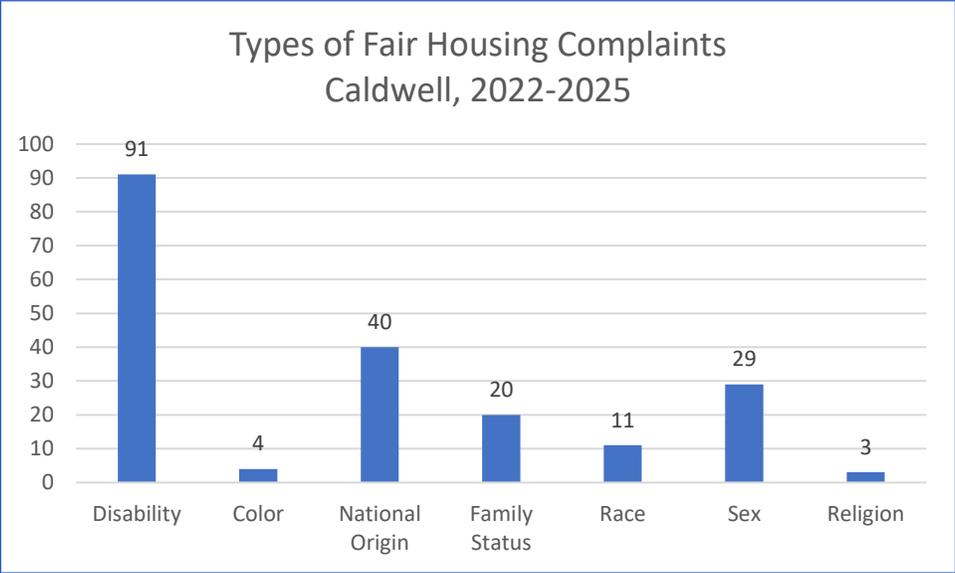
<sup>26</sup> <https://www.justice.gov/archives/opa/pr/justice-department-sues-six-large-landlords-algorithmic-pricing-scheme-harms-millions#:~:text=%E2%80%9CWhile%20Americans%20across%20the%20country%20struggled%20to,coordinated%20through%20a%20variety%20of%20means%2C%20including:>

# Fair Housing Complaints, 2023-2025

Fair Housing officials suggest that many fair housing complaint cases may intersection with other protected classes (e.g., familial status). Discrimination on the basis of disability represents the greatest share of cases, according to officials. Race/color/national origin cases tend to be the second highest source of complaints, followed by familial status. Religion tends to be the lowest-occurring form of discrimination.

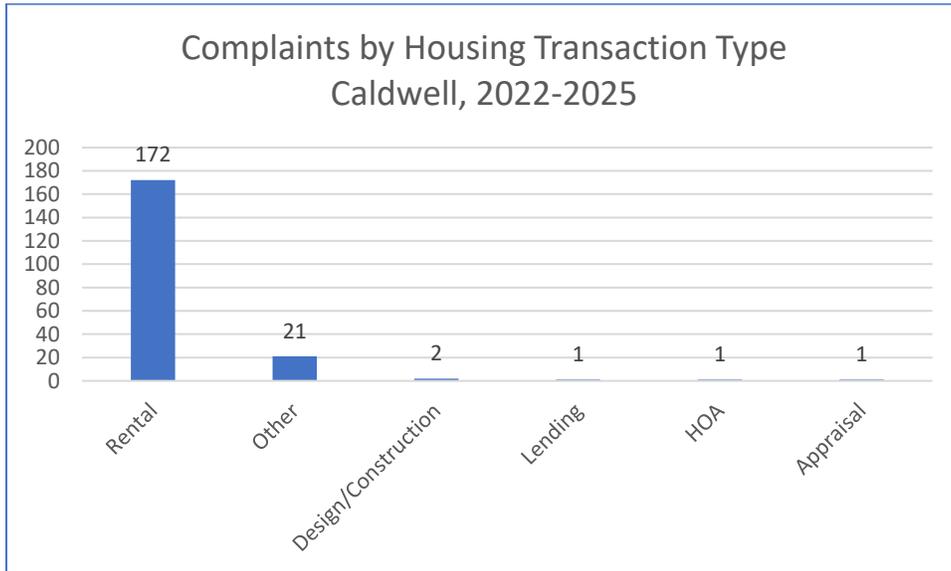
In the three-year period from January 1, 2023 through December 31, 2025, the Intermountain Fair Housing Council received 198 complaints regarding fair housing discrimination in Caldwell. Nearly half (91) were on the basis of Disability, with 40 related to National origin, 29 to Sex, and 20 to Family Status. (Please note: a case could have more than one basis of complaint.)

**BASIS OF COMPLAINT**  
**January 1, 2023 – December 31, 2025**  
**Intermountain Fair Housing Council**



**TYPE OF HOUSING TRANSACTION**  
**January 1, 2023 – December 31, 2025**  
**Intermountain Fair Housing Council**

The vast majority of housing transactions (87%) involved were rentals.



**Case Studies per the Intermountain Fair Housing Council (IFHC)**

The ways in which people’s fair housing rights are violated are varied and complex. The following are a small sample of the cases the IFHC has been involved in over the last three years.

**Renter – Disability**

One case involved 50 mixed 1-bedroom/2-bedroom units funded by federal government as Congregate Supports (meals and chores). When a new property manager took over the property, the tenants received notices that the Congregate Supports would end. IFHC received complaints from 11 clients regarding their needs for more time for to determine their eligibility for other similar programs; needs for service and lease extensions until alternative supports are found; and accessibility challenges.

Additionally, some residents reported being forced to sell their second cars. One tenant lost his and let it be towed off the property because he was told he’d be evicted. Residents also report that entrance doors are locked after office staff leave, and thus caregivers and EMTs are unable to get into the property.

### **Renter – National Origin**

In another case, a Property Manager told a tenant that their children (half-Hispanic) cannot play on the playgrounds, grass areas, or ride their bikes. Friends who don't live in the community but have come over the play have been approached and told that if they come back on the property, the property manager will call the police.

### **Renter -- Disability**

One person had been asked to move by Property Management from an upper level apartment to a lower level apartment. She was then served with an eviction notice because her cats aren't allowed on the property, even though they are service animals. She has been living out of her car for the last two years and needs resources to transition into permanent housing.

### **Renter -- Disability**

Another community member, who has medical problems, was being evicted because neighbors complained that he had the ambulance come to his home too many times.

### **Homeowner -- Familial Status, possibly Race**

While HUD has federal laws against discrimination by familial status, Idaho does not have a law against discrimination based on familial status. In another case, an HOA has required a family to submit an architectural review to plant trees, but has not required this of other homeowners in the neighborhood. The HOA alleges the family's planting of trees along the easement has violated the Covenants, Conditions, and Restrictions (CCR), but the trees don't obstruct water flow and therefore are not in violation.

The family's neighbor does not have children and used to serve on the HOA board and is friends with Board members. The complainant neighbor has planted trees along the easement, and another neighbor (white married couple with no children) planted 12 trees along the easement but didn't receive a complaint.

### *Potential Impediment to Fair Housing Choice -- Challenges for People with Disabilities*

Over the three-year period reviewed, disability issues represent nearly half of all complaints to the Intermountain Fair Housing Council, and disability remains a top fair housing complaint reason in many jurisdictions across the country.

The National Fair Housing Alliance (NFHA)'s 2025 Fair Housing Trends Report shows that, of 32,321 fair housing complaints filed nationally in 2024, more than 17,600 (54.6%) were issues of

disability discrimination,<sup>27</sup> resulting from refusal to grant reasonable accommodations, physically inaccessible housing features, or refusals to modify policies for disabled tenants.

Within Caldwell, while a shortage exists for affordable housing, stakeholders suggest an additional need for housing that is both affordable and accessible. In Caldwell, 12% of the under-65 population reports a disability.<sup>28</sup> As previously noted, nationwide, 48 million households (39%), have at least one person age 65+, a person with a disability, or both. About 1 in 8 households have a family member who uses a mobility device for a long-term condition. Nonetheless, only 5% of U.S. homes have a ramp, and 54% have a step-free entryway.<sup>29</sup> The NHS does not report data for Idaho homes.

If people with disabilities are on fixed incomes, their housing options are further limited. Fair Housing complaints and subsequent enforcement actions may result in more landlords' unwillingness to make reasonable accommodations or modifications.

**RECOMMENDATION:** The City's April 2025 Resolution 123-25 includes publicizing the importance of Fair Housing rights and responsibilities of citizens, including owners of real estate, developers, and builders. The City might also seek to educate landlords and the broader community on the need for reasonable accommodations or modifications to homes for people with disabilities, and assist people in requesting accommodations or modifications. The City might also expand awareness of its programs to help homeowners financially who seek to make safety or accessibility modifications to their homes.

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<sup>27</sup> <https://www.offitkurman.com/offit-kurman-blogs/2025-fair-housing-trends-compliance-risks>

<sup>28</sup> <https://www.census.gov/quickfacts/fact/table/caldwellcityidaho/PST045224>

<sup>29</sup> <https://www.census.gov/content/dam/Census/library/visualizations/2021/demo/AHS-Home%20Accessibility%202021.pdf>

## VI. Fair Lending: Home Mortgage Disclosure Act (HMDA) Analysis

The ability to enjoy the benefits and comforts of home ownership are dependent on financial resources to purchase a home. The ability to obtain a loan from a bank or other financial institution is therefore foundational to home ownership. Per the Federal Reserve, in September 2024, the total market value of owner-occupied real estate owned by individuals in the United States was approximately \$48 trillion.<sup>30</sup>

Discriminatory lending practices include declining mortgage applications from affected groups or offering particular groups more expensive and less desirable mortgage terms and conditions. Our analysis studied whether any of Caldwell's racial, ethnic, or sex/gender groups were denied/declined at a disproportionate rate when they applied for a mortgage. As discussed within the following section, because White applicants comprised over 96% of all applicants, the racial segmentation analysis had too small a sample size to make meaningful conclusions.

Because HMDA data is reported by county, we reviewed 14,923 home mortgage applications, or three years' worth of records from Canyon County from 2022 – 2024.

The 14,923 apps resulted in one of the following outcomes.

1. Loan Originated
2. Application Approved but Not Accepted
3. Application Denied
4. Application withdrawn by applicant
5. File closed for incompleteness

The data does not include applications with the following outcomes: (1) Purchased Loans, (2) Preapproval Requests Denied, or (3) Preapproval request approved but not accepted.

We then identified applications originating from 11 Caldwell census tracts within Canyon County, resulting in 3,570 applications for analysis. A final filtering of data for the following characteristics resulted in 2,411 applications for analysis. That is, in all, the 2,411 applications reviewed met the following criteria:

- One- to Four-Family Dwelling
- Manufactured Homes
- Owner Occupied as Principal Dwelling
- Secured by First Lien
- Home Purchase
- Caldwell resident
- Conventional Loan

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<sup>30</sup> <https://fred.stlouisfed.org/series/BOGZ1FL155035013Q>

For the 2,411 Caldwell-based applications, the consultant team reviewed data for the following outcomes:

1. Loan Originated
2. Application Approved but Not Accepted
3. Application Denied
4. Application withdrawn by applicant
5. File closed for incompleteness

**SUMMARY OF OVERALL RESULTS:** In all 75.7% of loan applications were approved, resulting in a loan origination. Caldwell's overall Denial/Decline rate, at 5.6%, resulted in 134 declines. As might be expected, significant segmentation of that denial data would make sample sizes too small and therefore more difficult to draw definitive conclusions regarding.

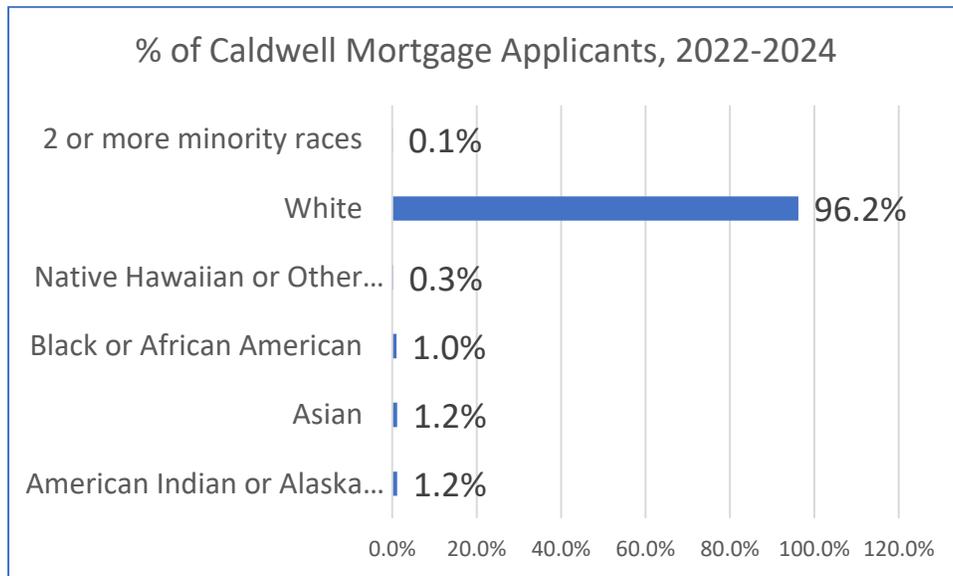
**SUMMARY OF OVERALL RESULTS -- DISPROPORTIONATE SHARE OF DECLINES:** In order to identify whether an ethnic/racial or gender group is considered to have a disproportionately greater number of lending declines, we adapt the HUD definition regarding disproportionate share of housing problems: that is, when the percentage of people in a group being declined exceeds the percentage for all ethnic/racial/gender groups as a whole by ten percentage points.

Because 96.2% of all applicants were White, the sample sizes of the various other racial groups were too small to analyze for disproportionate shares of declines. Additionally, no group had a denial rate more than 10% greater than the 5.3% average, although the group of 19 Black or African American applicants had a decline rate of 10.5%, or nearly double the overall denial rate.

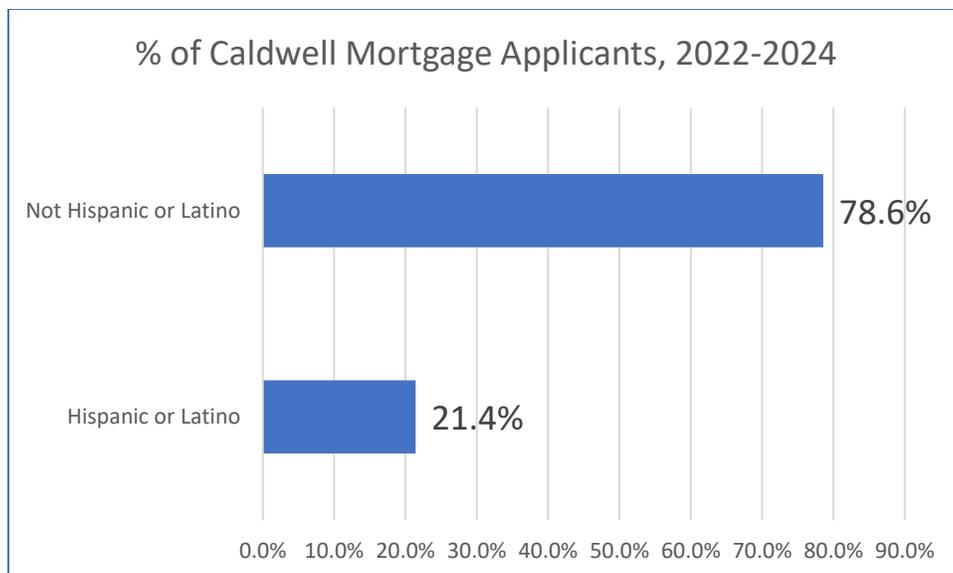
The pattern was similar for Hispanic or Latino applicants; while there was not a 10% difference in denial/decline rates between Hispanic/Latino and non-Hispanic/Latino applicants, the 11% denial/decline rate was more than twice that of non-Hispanic/Latino applicants. By sex, no disproportionate shares of declines were found.

## Profile of Applicants

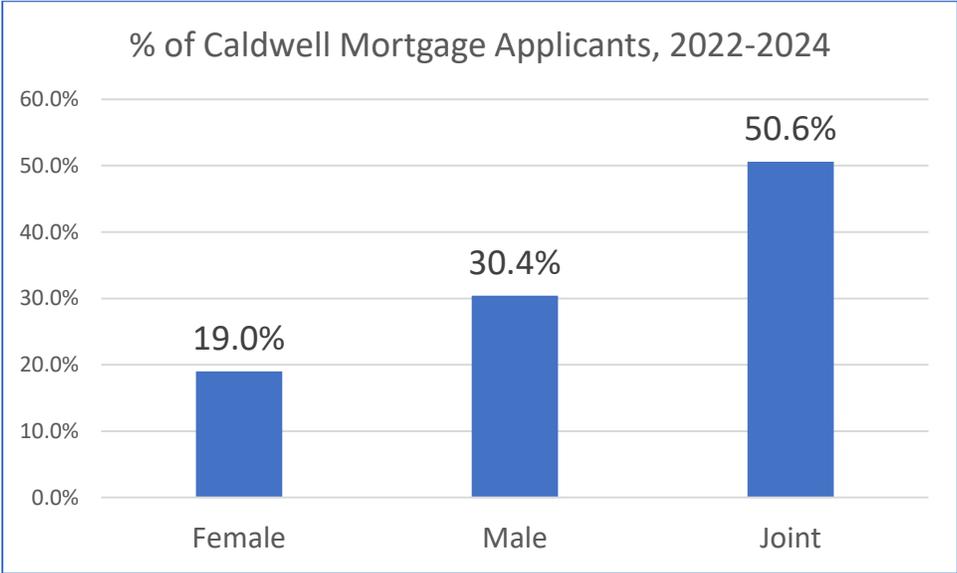
Of the 2,411 applicants for whom Race information was available, 96.2% were of White background, followed by 1.2% of Asian background and 1.2% of American Indian or Alaska Native background. Black or African American applicants represented 1% of applicants, and Native Hawaiian or Other Pacific Islander, and 2 or more minority races had less than 0.5% of applicants each.



By ethnicity, over 3/4 of applicants were Not Hispanic or Latino.



By sex, over 30% of applicants were male, 50.6% were joint applications, and 19% were female. Please note that our analysis will only review the 682 male and 426 female applications to determine whether there is bias in mortgage lending decisions.



## Mortgage Decisions

This data analysis looks at Conventional First Lien applicants and the outcomes of their mortgage applications. As previously stated, outcomes can be:

1. Application Approved and Loan Originated
2. Application Approved but Not Accepted by Applicant
3. Application Denied (Declined)
4. Application withdrawn by Applicant
5. File Closed for Incompleteness

For Approval analyses related to the (1) Share of Apps/Share of Declines (2) Declines by Group/Income Group, Approvals includes applicants in categories 1 and 2 above.

Please note: We use the terms “denied” and “declined” interchangeably.

# Mortgage Decisions by Race

Because 96.2% of all applicants were White, the sample sizes of the various other racial groups were too small to analyze for disproportionate shares of declines. From these limited samples, results show no group had a denial rate more than 10% greater than the 5.3% average, although the group of 19 Black or African American applicants had a decline rate of 10.5%, or nearly double the overall denial rate.

(Please note: Totals may not match those of other category Totals because some applicants do not answer each question.)

<b>% BY DECISION</b>	<b>Approved and Loan Originated</b>	<b>Approved but Not Accepted</b>	<b>Denied</b>	<b>App W/D by Applicant</b>	<b>Incomplete File</b>	<b>TOTALS (#)</b>
American Indian or Alaska Native	60.9%	0.0%	26.1%	13.0%	0.0%	23
Asian	87.0%	0.0%	0.0%	13.0%	0.0%	23
Black or African American	52.6%	10.5%	10.5%	26.3%	0.0%	19
Native Hawaiian or Other Pacific Islander	100.0%	0.0%	0.0%	0.0%	0.0%	5
White	76.0%	5.0%	5.1%	12.5%	1.4%	1,837
2 or more minority races	0.0%	0.0%	0.0%	100.0%	0.0%	2
<b>OVERALL AVERAGES</b>	75.7%	4.9%	5.3%	12.7%	1.4%	1,909

# Mortgage Decisions by Ethnicity

By Ethnicity, non-Hispanic or Latino applicants had higher approval rates (75.9%) than Hispanic or Latino applicants (72.0%).

With overall decline/denial rates of 5.8%, neither group’s rate of being declined exceeds the percentage for all ethnic/racial/gender groups as a whole by ten percentage points, although the Hispanic or Latino Denial rate is over twice that of non Hispanic or Latino applicants.

(Please note: Totals may not match those of Other Group Totals because some applicants do not answer each question.)

	Approved and Loan Originated	Approved but Not Accepted	Denied	App W/D by Applicant	Incomplete File	TOTALS (#)
Hispanic or Latino	72.0%	4.9%	11.0%	9.8%	2.4%	410
Not Hispanic or Latino	75.9%	4.9%	4.5%	13.4%	1.3%	1,505
OVERALL AVERAGES	75.1%	4.9%	5.8%	12.6%	1.5%	1,915

# Approval Rates by Ethnicity and Income

By Income and Ethnicity, non-Hispanic/Latino applicants generally have higher approval rates at most income categories. It is important to note again, however, that with such segmentation of the data, sample sizes become smaller and may offer only directional information.

NOTE: This does not include applicants for whom income was unavailable.

## Approval Rates (%) by Ethnicity and Income

	0	1K-10K	11K-25K	26K-50K	51K-75K	76K-100K	101K-150K	151K-200K	201K-300K	301K-400K	401K-500K	500K+	TOTAL
Hispanic or Latino	0	0	0	56	74	83	69	67	80	100	0	100	405
Not Hispanic or Latino	20	0	33	69	76	79	77	76	81	73	60	57	1489
Grand Total	17	0	20	66	76	80	76	75	81	79	60	67	1894

## Share of Applications and Declines by Ethnicity

Applications by Hispanic or Latino applicants represent 21% of all apps and 40% of all declines.

	<b>% TOTAL APPS</b>	<b>% TOTAL DECLINES</b>
Hispanic or Latino	21%	40%
Not Hispanic or Latino	79%	60%

## Decline Reasons by Ethnicity

Debt/Income Ratio was the most frequently-cited reason for declines for all ethnic groups.

In second place was Credit history as a decline reason among all ethnic groups. Please note: Hx below refers to “History” – Employment History or Credit History.

	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>9</b>	
	<b>Debt-to- Income ratio</b>	<b>Empl Hx</b>	<b>Credit Hx</b>	<b>Collateral</b>	<b>Insuff Cash</b>	<b>Unverif Info</b>	<b>Incomplete</b>	<b>Other</b>	<b>TOTAL</b>
Hispanic or Latino	48.9	0.0	22.2	2.2	4.4	11.1	4.4	6.7	45
Not Hispanic or Latino	43.3	1.5	28.4	3.0	7.5	4.5	3.0	9.0	67
Grand Total	45.5	0.9	25.9	2.7	6.3	7.1	3.6	8.0	112

# Mortgage Decisions by Sex

By Gender, 1.6x as males as females applied for loans. (Please note: this analysis does not include joint applications or those applications where the person’s sex isn’t provided.) Female applicants have higher approval rates than male applicants, but not disproportionately so.

	<b>Approved and Loan Originated</b>	<b>Approved but Not Accepted</b>	<b>Denied</b>	<b>App W/D by Applicant</b>	<b>Incomplete File</b>	<b>TOTALS (#)</b>
Female	75.6%	3.3%	6.3%	12.2%	2.6%	426
Male	71.3%	4.4%	7.6%	15.4%	1.3%	682
TOTAL	72.9%	4.0%	7.1%	14.2%	1.8%	1,108

# Approval Rates by Sex and Income

By Income and Gender, female applicants generally have higher approval rates at most income ranges. In the two income groups in which 100% of male or female apps were approved, there are only 1 apps in that group. As previously stated, with such small sample sizes, it is difficult to draw firm conclusions from this data.

### Approval Rates by Sex (%)

	0	1K- 10K	11K- 25K	26K- 50K	51K - 75K	76K - 100K	101K - 150K	151K- 200K	201K- 300K	301K- 400K	401K- 500K	500K+	Total
Female	N/A	N/A	14	65	77	88	81	63	73	100	0	N/A	423
Male	25	0	100	64	75	78	68	68	78	63	N/A	43	673
Grand Total	25	0	25	65	76	81	72	66	77	75	100	43	1096

## Share of Applications and Declines by Sex

Applications by females represent 38% of all apps and 34% of all declines.

	<b>% TOTAL APPS</b>	<b>% TOTAL DECLINES</b>
Female	38%	34%
Male	62%	66%

## Decline Reasons by Sex

Debt/Income ratio was the most frequently-cited reason for declines for all applicants.

In second place was Credit History. Please note: Hx below refers to “History” – Employment History or Credit History.

	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>9</b>	
	<b>Debt-to- Income ratio</b>	<b>Empl Hx</b>	<b>Credit Hx</b>	<b>Collateral</b>	<b>Insuff Cash</b>	<b>Unverif Info</b>	<b>Incomplete</b>	<b>Other</b>	<b>TOTAL</b>
Female	48.1	0.0	33.3	3.7	0.0	7.4	7.4	0.0	27
Male	46.2	1.9	25.0	1.9	7.7	3.8	5.8	7.7	52
Grand Total	46.8	1.3	27.8	2.5	5.1	5.1	6.3	5.1	79

# Mortgage Decisions by Census Tract

Although the data is cut so finely by census tracts, we included all categories of applicant outcomes, including those Withdrawn by the Applicant or Incomplete applications because of the wide variety in outcomes beyond approvals or denials/declines within Census tracts. Looking at the entire universe of applications, in total 75.6% of applicants were approved. Another 5.6% of applicants were declined/denied.

In terms of the range of approval rates, approval rates ranged from 52.6% in tract 21500 and 64.3% in tract 21600 to 80.3% in tract 21005 and 82.4% in tract 21003.

In terms of the range of decline/denial rates, those rates ranged from 2.0% in 21003 and 3.5% in 21907 to 10.9% in 21500 and 13.4% in 21702.

The census tract with the highest share of Incomplete Apps was 21500 (5.8%). Those census tracts for which 15% or more of all applications were withdrawn by the applicant include 21004 (15.2%), 21600 (15.9%), 21202 (17.4%), and 21500 (19.7%).

As previously stated, as the home mortgage data is segmented further, sample sizes may be too small to draw definitive conclusions, in this case, in terms of denials/declines. No census tract had a denial rate 10% higher than the overall average, but the 21500 and 21702 census tracts denial rates were 49% and 58% higher than overall averages of 5.6%.

Census Tract	Approved & Loan Originated	App approved but not accepted	App denied	App withdrawn by applicant	File closed for incompleteness	TOTAL
21003	82.4%	3.4%	2.0%	12.2%	0.0%	148
21004	75.0%	3.4%	4.4%	15.2%	2.0%	204
21005	80.3%	3.1%	4.6%	11.6%	0.4%	458
21101	80.1%	3.3%	4.3%	11.1%	1.2%	584
21202	66.1%	11.0%	3.7%	17.4%	1.8%	109
21300	78.0%	2.8%	9.2%	9.2%	0.9%	109
21500	52.6%	10.9%	10.9%	19.7%	5.8%	137
21600	64.3%	7.9%	7.9%	15.9%	4.0%	126
21701	77.4%	7.3%	4.4%	10.2%	0.7%	137
21702	66.9%	6.4%	13.4%	9.3%	4.1%	172
21907	79.3%	2.6%	3.5%	13.7%	0.9%	227
Grand Total	75.6%	4.6%	5.6%	12.6%	1.6%	2411

## Decline Reasons by Census Tract

As with our other reviews of decline reasons by different groups, Debt-to-income ratio, followed by Credit History, continues to be a leading decline reason. For tract 21003, two thirds of applicants were declined for Incomplete Applications. For 21702, Credit History was the top decline reason.

Other decline reasons vary widely, including Collateral, Employment History, or Insufficient Cash; additionally, the small number of apps in some census tracts makes percentages appear very high. Please note: Hx below refers to “History” – Employment History or Credit History.

	1	2	3	4	5	6	7	9
Census Tract	Debt-to-Income ratio	Empl Hx	Credit Hx	Collateral	Insuff Cash	Unverif Info	Incomplete	Other
21003	0.0	0.0	33.3	0.0	0.0	0.0	66.7	0.0
21004	33.3	0.0	22.2	0.0	11.1	11.1	11.1	11.1
21005	57.1	4.8	9.5	0.0	9.5	9.5	4.8	4.8
21101	48.0	0.0	8.0	4.0	0.0	12.0	12.0	16.0
21202	50.0	0.0	25.0	25.0	0.0	0.0	0.0	0.0
21300	60.0	0.0	20.0	0.0	10.0	0.0	10.0	0.0
21500	40.0	0.0	33.3	6.7	13.3	6.7	0.0	0.0
21600	50.0	0.0	20.0	10.0	10.0	0.0	0.0	10.0
21701	66.7	0.0	33.3	0.0	0.0	0.0	0.0	0.0
21702	34.8	0.0	47.8	4.3	4.3	4.3	0.0	4.3
21907	25.0	0.0	25.0	12.5	0.0	12.5	0.0	25.0
TOTALS	44.8	0.7	23.9	4.5	6.0	6.7	6.0	7.5

## VII. Caldwell Policies and Programs

This section reviews Caldwell’s different public policy and programs to determine whether there are any potential impediments to Fair Housing. Caldwell has numerous public policies and programs to address Fair Housing through affordable housing opportunities.

### A. ZONING AND LAND USE

The City’s updated Comprehensive Plan, completed in April 2025, received the Outstanding Plan Award from the American Planning Association (APA) Idaho chapter in October 2025. The Plan increases density in the downtown area, in part to make the provision of utilities more economically feasible.

Changes to the Comprehensive Plan will help promote more affordable housing, including zoning density bonuses for certain parts of the City. Additionally, the City’s new Comprehensive Plan allows for more Accessory Dwelling Units, or ADUs, and officials are seeking creative ways to support ADU development throughout the City.

With the recent Zoning refresh in 2025, Caldwell’s Zoning Sec. 10-05-02 offers regulations for residential districts, including the following new residential district categories:

New Residential Zone Designation	Zoning District
RS-1	Semi-Rural Residential 1
RS-2	Semi-Rural Residential 2
R-1	Neighborhood Residential
R-2	Community Residential
R-3	Urban Residential

Through Zoning 10-03-18, the City offers density bonus opportunities for reduced lot sizes and also offers incentives based on the incorporation of affordable units, universal design standards, amenities, housing variation (including ADUs), and open spaces.

As the table below shows, developers can significantly increase the number of dwelling units per acre (du/ac) if they meet the density bonus criteria.

Table 1:				
Comprehensive Plan Land Use Designation	Compatible Zoning Districts	Minimum Density	Maximum Density	Density Bonus & Conservation Area Development
Neighborhood 1	RS-1, RS-2	0 du/ac	2 du/ac	3 du/ac if conservation area development is used. Refer to Chapter 10, Article 5
Neighborhood 2	R-1, R-2, C-1, P-D	2 du/ac	8 du/ac	Up to 12 du/ac <sup>2</sup>
Neighborhood 3	R-2, R-3, C-1, C-2, P-D	4 du/ac	20 du/ac	Up to 25 du/ac
Urban Neighborhood	R-2, R-3, C-1, T-N, P-D	4 du/ac	10 du/ac	Up to 16 du/ac
Community Center	R-2, R-3, C-1, C-2, C-3, H-C, P-D	8 du/ac	15 du/ac	Up to 25 du/ac
Mixed Use Center	R-3, C-2, C-3, C-4, H-C, P-D	10 du/ac	25 du/ac	Up to 40 du/ac

A City official noted that the April Code change stated that the minimum 8,000 square foot lot size can be reduced for the building of townhomes. Now, townhomes 20 feet across can be built on 2,000 square foot lots. One organization that supports homebuyers would like to build townhomes, they find that townhomes aren't in much demand in Caldwell; they are more popular in Boise and Meridian.

### **ZONING -- ACCESSORY DWELLING UNITS**

A Freddie Mac survey found that, while 71% of consumers were unfamiliar with Accessory Dwelling Units (ADUs), once they learned about ADUs, 32% of respondents were interested in building one on their property.<sup>31</sup> Per the Mercatus Center at George Mason University, California and 13 other states have broadly legalized the construction of ADUs to expand lower-cost housing options for their residents.<sup>32</sup>

Section 10-12-03-1 of City Zoning shows that Accessory Buildings for Use (Residential) are permitted in all residential zoning districts. In addition to providing another opportunity for more affordable housing, these units can become a source of income and wealth for the builder of that ADU.

### **CALDWELL URBAN RENEWAL AREA**

Idaho law does not allow for sales taxes to develop areas, but encourages the use of Urban Renewal Areas to offset development costs and incentivize projects. Caldwell City Council plans to adopt a new urban renewal area, a 1,000 acre district in northwest Caldwell, which will help strengthen industrial activity within the city. The district overlaps with a HUD R/Ecaps area.

In the Urban Renewal Area, developers can bring in lower-cost housing and the City pays for public infrastructure, with improvements in sidewalks, curbs, and other infrastructure improvements.

## **B. DEVELOPMENT FEES**

Section 10-03-14-5 includes Impact Fees, specifically for park, fire, police, and traffic impacts. Affordable housing developments may be exempt from the impact fee requirement, *“provided that the exempt development's proportionate share of system improvements is funded through a revenue source other than impact fees.*

*1. Current housing affordability guidelines published by the U.S. department of housing and urban development ("HUD") shall be used to determine whether dwelling units in the development qualify as affordable housing.*

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<sup>31</sup> <https://www.freddie.mac.com/research/consumer-research/20230124-adus-can-increase-housing-stock-most-are-unfamiliar>

<sup>32</sup> <https://www.mercatus.org/research/policy-briefs/taxonomy-state-accessory-dwelling-unit-laws-2024>

2. *Affordable housing projects are required to demonstrate that they will provide dwelling units to eligible families based on HUD income and family size guidelines.*

3. *Providers of affordable housing dwelling units must demonstrate a long-term commitment to providing affordable housing for a period of not less than twenty (20) years. Affordability of the designated percentage of the development shall be ensured through covenants and deed restrictions at the discretion of the city in consultation with the city attorney. (Ord. 3642, 1-21-2025)”*

One housing official reported that the Snake River Valley Builders and Contractors Association suggested that, if developers had fewer requirements related to inspections, permitting, etc., the price of new construction could be reduced 10-15%.

### C. BUILDING CODES

The City’s utilizes national and international codes, including the following<sup>33</sup>.

- 2018 International Residential Code - Parts I, II, III, IV and IX
- 2018 International Building Code
- 2018 International Existing Building
- 2018 International Fire Code Administrative Rules - IDAPA 07.03.01
- 2023 National Electrical Code
  
- Administrative Rules - IDAPA 07.01.01 - 07.01.11
  
- 2018 International Mechanical Code
- 2018 International Fuel Gas Code
- 2017 Idaho State Plumbing Code - Based off of the 2015 Uniform Plumbing Code
  
- Administrative Rules - IDAPA 07.02.02 - 07.02.07
  
- 2018 International Energy Conservation Code (With State Amendments)
- 2018 International Property Maintenance Code
- 1997 Uniform Code for the Abatement of Dangerous Buildings
- 1997 Uniform Sign Code

None of these Codes suggest any potential impediments to Fair Housing or present accessibility concerns.

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<sup>33</sup> [https://www.cityofcaldwell.org/Departments/Community-Development/Building-Safety-Division/Code-Resources-FAQs#:~:text=The%20City%20of%20Caldwell's%20building%20codes%20include%20Building%20Officials%20\(IDABO\)\\*\\*%20\\*%20\\*\\*Idaho%20State%20Statutes\\*\\*](https://www.cityofcaldwell.org/Departments/Community-Development/Building-Safety-Division/Code-Resources-FAQs#:~:text=The%20City%20of%20Caldwell's%20building%20codes%20include%20Building%20Officials%20(IDABO)**%20*%20**Idaho%20State%20Statutes**)

With the state's adoption of International Building Codes, Fair Housing organizations have seen fewer violations of Americans with Disabilities Act codes in the development of multifamily housing. However, within new single-family homes, Fair Housing officials report that major nationwide builders do not offer accessible home templates, and therefore people with disabilities must retrofit their homes after they are built, adding considerable cost.

One local Fair Housing agency reports that, while it may be less expensive for people to remain in their homes with some accessibility modifications and home care services, people with accessibility concerns may be institutionalized into assisted living or nursing homes.

## D. Other Caldwell Policies

### **City Policies -- To Reduce Cost of Housing**

The City continues to work to make housing more Affordable through the purchase and disposition of land to help reduce developer costs. By reducing developer costs, the City helps to increase the supply of affordable housing. The City has recently worked with a developer to create 7 cottage-style homes at a \$300,000 price point.

With CDBG helping with land acquisition costs, and with linking land use applications to specific entitlements, and with the City trying to help developers identify other sources of federal funding, an opportunity exists to build more housing for low- and extremely-low income households, as well as seniors and people with disabilities. At this time, applications to build multifamily housing must go through the City Council to obtain a special use permit.

### **City Policies -- Low Income Housing Tax Credit (LIHTC) HOUSING**

In the state of Idaho, the Idaho Housing and Finance Association (IHFA) is the issuer of Low-Income Housing Tax Credits (LIHTC), which many stakeholders described as a very competitive process. The City works with IHFA on affordable housing projects and the environmental review process on overlapping projects. The City works with low-income housing developers, such as providing letters of support and earmarking CDBG funds to cover gaps within LIHTC funding, to help developers secure these tax credits.

According to Fair Housing officials, when developers propose Section 42 (Low Income Housing Tax Credit, or LIHTC) housing, or mixed income or mixed-use housing, a small group of vocal Caldwell residents will protest. Similarly, the official stated, residents don't like Section 8 Project-Based Voucher housing, certified family housing, or elder disabled housing.

Residents tend to favor building low-income housing for elderly residents. A Fair Housing official thought there might be an opportunity for the City to champion housing projects and educate the community on why their neighbors need such housing.

### *Potential Impediment to Fair Housing to Fair Housing Choice – Need for Builder Education*

An opportunity might exist to educate providers on some practices that might make homes more accessible to more people. A Fair Housing official said that she often hears housing providers say, “We didn’t know we could do that.” Other sources of confusion for builders include whether a conditional or special use permit is required for the development of a certified family home or group home.

**RECOMMENDATION:** The Fair Housing official thought that low-income housing developers might benefit from a development checklist so that they understand the various steps of the process, including accessibility, environmental impacts, and fair housing requirements.

The City might consider adapting existing developer checklists created by other jurisdictions. For example, Boston offers a checklist.<sup>34</sup> Other cities with checklists and applications include Burien, Washington.<sup>35</sup>

As previously stated, the City seeks to educate the community regarding the benefits of accessible housing for all. The Fair Housing official suggested that a Fair Housing overlay to zoning regulation might include processes for confidential meetings about fair housing standards that protect people’s privacy about their conditions. A Fair Housing Coordinator, with an understanding of Section 504 and ADA requirements, could facilitate such meetings. To ensure that all people have access to zoning and fair housing debates and decisions, the City might provide American Sign Language (ASL) or other translation services.

### **City Policies -- Home Ownership**

On a household level, Caldwell will continue to assist low-and moderate-income homebuyers with financial assistance, as well as offering emergency and critical repairs to low- and moderate-income households. To promote home ownership, the City utilizes CDBG funds to support qualifying homeowners with downpayment assistance. From 2021-2025, at least six households were assisted.

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<sup>34</sup> [https://www.boston.gov/sites/default/files/file/2024/08/14B-2024-08-02\\_MOH%20Design%20Checklists.pdf](https://www.boston.gov/sites/default/files/file/2024/08/14B-2024-08-02_MOH%20Design%20Checklists.pdf)

<sup>35</sup> ([https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server\\_11045935/File/Business/Building%20&%20Construction/Permit%20Center/Inspection%20Checklists/Affordable%20Housing%20Demonstration%20Program%20Checklist.pdf](https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_11045935/File/Business/Building%20&%20Construction/Permit%20Center/Inspection%20Checklists/Affordable%20Housing%20Demonstration%20Program%20Checklist.pdf))

Additionally, the City Housing Authority has begun a program to raise awareness and educate residents on the path to home ownership. CHA recently held a Housing Challenge in which a 1950s home was renovated; the new home appraised at \$340,000, but the challenge “winner” would be able to purchase it for \$172,000.

Approximately 1,000 people were interested. After the various requirements of low-moderate income; five years of employment in Caldwell; connections to the community through service clubs, volunteering, or coaching; and then filing the paperwork; providing three years of tax returns; qualifying for a mortgage; and having \$10,000 for closing costs, only three people remained, and one purchased the home.

The Housing Authority has encouraged other developers to offer a similar “challenge” with one of the homes in their new development.

### **City Partner Policies -- Housing Choice Voucher Homeownership Option**

Qualifying Caldwell residents receive Housing Choice Vouchers through the Housing Choice Voucher Homeownership Option (HCVHO), a Southwestern Idaho Cooperative Housing Authority program designed to promote and support homeownership. Qualifying families must be currently receiving Section 8 rental assistance in Canyon, Gem, or Elmore Counties to use their HCV toward the purchase of a home. Families’ mortgage payment will be subsidized rather than their rent. The HCVHO program is administered locally by SICHA, who receives federal funds from the Department of Housing and Urban Development (HUD) to administer the HCVHO program.

- Disabled and/or Elderly Families must meet a minimum income standard equal to the monthly Federal SSI benefit for an individual living alone multiplied by twelve. ( $\$674.00 \times 12 = \$8,088.00$ )
- All Other Families must have a total annual income of not less than the Federal minimum hourly wage (presently \$7.25) multiplied by 2000 hrs. ( $\$7.25 \times 2000 = \$14,500$ )

SICHA’s Resident Advisory Board offers guidance and assistance in helping to strengthen their communities.

## **E. CALDWELL HOUSING AUTHORITY POLICIES**

The Caldwell Housing Authority (CHA) is financially separated from the government and receives its funding through rents paid by residents. The Housing Authority’s residents tend to be households who do not qualify for federal subsidies but for whom housing is still too expensive. The housing authority uses HUD FMRs but discounts rents by 20%-50%. On average, rents are 65% of the market rate.

In its Occupancy Policy, the Caldwell Housing Authority utilizes the following approach in addressing Fair Housing Choice.

*“The Caldwell Housing Authority adheres to Title VI of the Civil Rights Act of 1964, Title VIII of the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and the Americans with Disability Act. In accordance with federal law, the Caldwell Housing Authority is prohibited from discriminating on the basis of race, color, national origin, age, disability, religion, sex and familial status. The Caldwell Housing Authority further embraces the diversity of our community and does not discriminate based on sexual orientation or gender identity. If you feel the housing authority has discriminated against you, please feel free to contact Idaho Legal Aid or the Idaho Human Right Commission.<sup>36</sup>”*

## F. NEIGHBORHOOD REVITALIZATION STRATEGY AREAS (NRSA)

Caldwell does not have any NRSA's.

## G. EMPLOYMENT-HOUSING-TRANSPORTATION LINKAGE

City officials felt that more public transportation options would be very helpful. Residents can call Valley Regional Transit to schedule door to door service, and there's one local bus route down Cleveland Boulevard in Caldwell. The City's 2025 Comprehensive Plan estimated densities along major corridors to support planning for the longer-term development of more bus routes, including those for people to go to Nampa for commercial needs.

With the shortage of public transportation, low-income households may lack stable modes of traveling to work, school, medical appointments, or shopping options. Housing mobility may also be affected: households with housing choice vouchers may not have the transportation, or the funds to hire someone to physically move their possessions to a new home. These additional challenges present additional obstacles for tenants looking to find new housing situations.

The City Council plans to incorporate a new Urban Renewal Area in Caldwell, a 1,000 acre district in the northwest part of the city, which will help strengthen industrial activity within the city. The district overlaps with a HUD R/ECAPS area.

In the Urban Renewal Area, developers can bring in lower-cost housing and the City pays for public infrastructure, with improvements in sidewalks, curbs, and other infrastructure improvements. Additionally, proposed housing projects are reviewed for neighborhood

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<sup>36</sup> <https://chaidaho.org/occupancy-policy/>

standards, including low-income and racial considerations, access to transportation, services, and environmental concerns.

## H. TAXATION

Per state law, Canyon County offers a homestead exemption program that reduces the net taxable value of a home and up to one acre of land by half (up to a certain maximum.) In 2021, the state legislature set the maximum homeowner’s exemption at \$125,000, and it has remained at this level. Per Idaho Code 63-602G, To qualify for a homeowners exemption, it is necessary to own and occupy the home as a primary residence.<sup>37</sup>

## I. OTHER COUNTY OR STATE LAWS AFFECTING CALDWELL CITIZENS

### **Evictions and Eviction Court**

Officials supporting homeless people, or those at risk of homelessness, note that a large share of homeless people have gone through an eviction process, which “moves quickly” in Idaho. Strong growth in housing costs, along with 10+% increases in utility costs, are making financial conditions challenging for households, according to an official. City officials also suggest that the high cost of housing is an issue, especially if people have high medical bills or are caring for others and are financially squeezed.

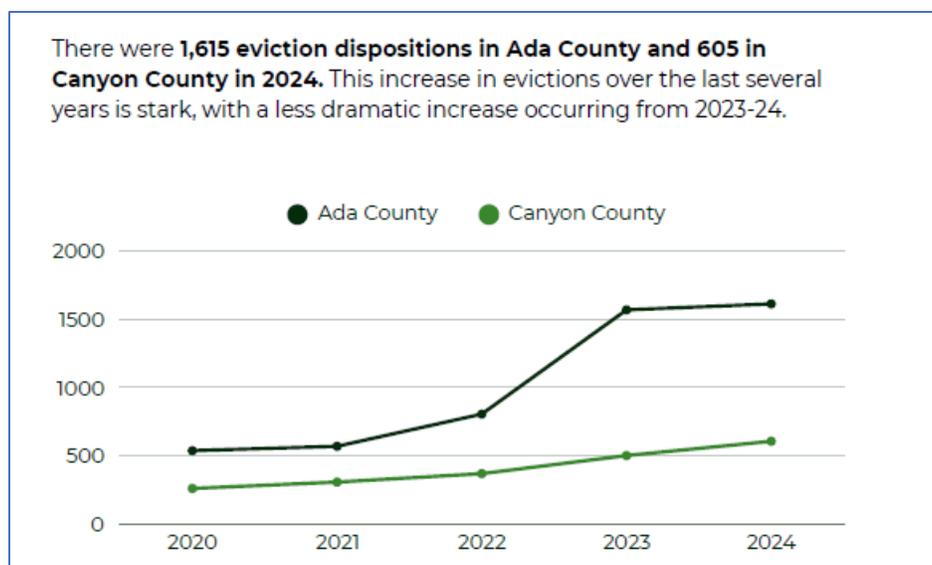
An official working with people at risk of homelessness noted that medical reasons, having a fixed income while housing prices skyrocket, or having an unexpected bill can place people in risk of homelessness. One public housing official noted that she hears from seniors who are on fixed incomes and cannot find affordable housing; they may be living out of their cars or doubled up with others.

The nonprofit Jesse Tree helps households avoid eviction through emergency rent and utilities payments and financial counseling. Of its 3,608 applications for rental assistance received by the agency in 2024, approximately 13.8% came from Caldwell. Jesse Tree’s 2024 report on eviction rates in Treasure Valley<sup>38</sup> found that the number of evictions in Canyon County and its neighbor Ada County have increased tremendously since 2020 due to stagnant wages, low vacancy rates, and rising rents and increased general costs of living.

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<sup>37</sup> <https://www.canyoncounty.id.gov/elected-officials/assessor/exemptions/>

<sup>38</sup> <https://static1.squarespace.com/static/66f63d009a414e3e70e7eace/t/67ed7177bc090302c73b7717/1743614344935/2024+Eviction+Report.pdf>



Source: Jesse Tree 2024

### *Potential Impediment – Lack of Canyon County Eviction Court Options*

One official noted that, in nearby Ada County, the court system allows for 3<sup>rd</sup> party mediation to help keep people in their homes. Approximately 80% of the participants in mediation are able to successfully comply with the terms of the payment agreement and keep their homes and keep their evictions off their permanent record.

According to this official, Canyon County, which has seen its eviction filings increase from 200 a few years ago to over 700 today, does not offer this option. In addition to Jesse Tree, Idaho Legal Aid also offers help with eviction and prevention of eviction, but, like many organizations, its funding has been cut.

**RECOMMENDATION:** Because Eviction Court is a county institution, there is little Caldwell can do to change this current policy, beyond lobbying for a mediation process that helps develop agreements that allow families to retain their housing and landlords to be compensated.

### *Potential Impediment – State Laws regarding Homelessness*

Caldwell has begun to see an increase in its homeless population, likely due to a variety of factors. An Idaho state law that took effect July 1, 2025 requires jurisdictions with 100,000+ residents to enforce laws meant to ban public camping and sleeping on public property, roads, or rights of way, regardless of shelter bed availability.

Several larger cities around Caldwell (Boise, Meridian, Nampa) exceed 100,000 in population and therefore may be forcing homeless people to seek other accommodations, including within

Caldwell. Some local officials have suggested that homeless people are also coming from other states, where they may have been undocumented immigrants and/or homeless.

The City is trying to identify a strategy to support the new influx of unhoused people. One official noted that nearly every day she sees another person on the road sleeping in their car, sometimes parked behind stores or spending time in the library. One local housing official stated that this law puts “people on the periphery in the shadows of the periphery.”

**RECOMMENDATION:** As with the Eviction Court situation discussed previously, changes to this policy are not within the City’s authority to change. Caldwell can continue to work with its Continuum of Care on Homelessness (CoC) and community partners to support people at risk of homelessness or those who are homeless.

## VIII. Conclusions

Caldwell has made strong efforts to provide affordable and accessible housing through its various policies. Zoning and building codes do not appear to be a barrier to affordable housing. As previously stated, some of the City’s policies and programs can serve as models for other communities, and in particular the Caldwell 2025 Comprehensive Plan.

Rather, the greatest barriers to affordable housing within the City of Caldwell, like much of the state and country, is the increasingly high cost of housing. High costs are particularly challenging for those on fixed incomes, including seniors and people with disabilities.

The City of Caldwell has numerous programs and strategies in place to support every resident in searching for and accessing safe housing for themselves and their families. Several potential impediments were identified as possible barriers to fair housing. Many of them are related to additional education of housing owners, realtors, developers, and residents on the advantages of fair housing choice for everyone in the community. Two of the potential impediments result from county or state policies outside of Caldwell’s control.

The City of Caldwell has numerous programs and strategies in place to support every resident in searching for and accessing safe housing for themselves and their families. The City’s commitment to Fair Housing Choice was reaffirmed by City Resolution 123-25 and offers a strong foundation for additional efforts to further fair housing choice.

## APPENDIX: Organizations Providing Input into this Analysis of Impediments to Fair Housing

In addition to the rich feedback from the public, we are grateful to the following organizations for providing their insights into the development of this Analysis of Impediments to Fair Housing Choice.

### **CITY OF CALDWELL**

Honorable Mayor and City Council Members

Caldwell Code Compliance  
Caldwell Community Development  
Caldwell Economic Development Corp  
Caldwell Police/Emergency Services  
Caldwell Housing Authority  
Caldwell Planning and Zoning Department  
Caldwell Public Schools  
Caldwell Public Works

### **Local, State, and National Partners**

Advocates Against Family Violence  
Autumn Gold  
CATCH  
Community Council Idaho  
House Idaho Collaborative (HIC)  
Idaho Housing and Finance Association (IHFA)  
Intermountain Fair Housing Council  
Jesse Tree  
New Beginnings Housing  
Salvation Army  
Southwestern Idaho Cooperative Housing Authority (SICHA)  
Southwest District Health

## List of Acronyms

The following acronyms are used throughout this report.

ACS: American Community Survey

AIFH: Analysis of Impediments to Fair Housing Choice

CDBG: Community Development Block Grants

CHAS: Comprehensive Housing Affordability Strategy

FH: Fair Housing

HMDA: Home Mortgage Disclosure Act

HUD: U.S. Department of Housing and Urban Development

LIHTC: Low Income Housing Tax Credits

NRSA: Neighborhood Revitalization Strategy Areas