

Analysis of Impediments to Fair Housing Choice

June 2024

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JOINT ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

June 2024

WATERLOO/ CEDAR FALLS HOME CONSORTIUM

City of Waterloo
City of Cedar Falls

Prepared for the Waterloo/Cedar Falls HOME Consortium by
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CHAPTER 1.

INTRODUCTION

The purpose of this Joint Analysis of Impediments to Fair Housing Choice is to study a broad array of public and private policies, practices, and procedures affecting housing choice across the adjacent cities of Cedar Falls and Waterloo, Iowa. This document will provide detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates in the region with a foundation upon which to implement strategies that will address disparities in housing needs and in access to opportunity; support integrated living patterns; and maintain compliance with civil rights and fair housing laws.

FAIR HOUSING PLANNING

Equal access to housing choice is crucial to America's commitment to equality and opportunity for all. Title VIII of the United States Civil Rights Act of 1968, more commonly known as the Fair Housing Act, provides housing opportunity protection by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), specifically HUD's Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

Provisions to affirmatively further fair housing (AFFH) are basic long-standing components of HUD's housing and community development programs. The AFFH requirements are derived from Section 808(e)(5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department's housing and urban development programs in a manner to affirmatively further fair housing.¹

Local communities that receive grant funds from HUD through its entitlement process, including Cedar Falls and Waterloo, satisfy this obligation by performing an "Analysis of Impediments to Fair Housing Choice" (AI). In an AI, communities that receive HUD entitlement grant funds evaluate barriers to fair housing choice and develop and

¹ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13)*. March 1996.

implement strategies and actions to overcome any identified impediments based on their individual histories, circumstances, and experiences. Through this process, local entitlement communities promote fair housing choices for all persons, including classes protected under the Fair Housing Act, and provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

HUD will presume that the grantee is meeting its obligation and certification to affirmatively further fair housing by taking actions that address the impediments, including:

- Analyzing and eliminating housing discrimination within the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to all persons to include those persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Through its Community Planning and Development (CPD) programs, HUD's goal is to expand mobility and widen a person's freedom of choice. The Department also requires Community Development Block Grant (CDBG) program grantees to document AFFH actions in the annual performance reports that are submitted to HUD.

In 2015, HUD published a final rule on Affirmatively Furthering Fair Housing, which outlined procedures that jurisdictions and public housing authorities who participate in HUD programs must take to promote access to fair housing and equal opportunity. This rule stipulated that grantees and housing authorities take meaningful actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class characteristics. Under HUD's final rule, grantees must take actions to:

- Address disparities in housing need;
- Replace segregated living patterns with integrated and balanced living patterns;
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster and maintain compliance with civil rights and fair housing laws.

To assist grantees and housing authorities affirmatively further fair housing, HUD provided publicly-available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally-determined priorities and goals. HUD's final rule mandated that most grantees begin submitting to HUD an assessment developed using this tool in 2017; however, a 2018 HUD notice withdrew the requirement to prepare such assessments. A subsequent notice further required that grantees instead prepare and keep on file a current Analysis of Impediments to Fair Housing Choice. HUD's data and maps remain available for grantees to use in preparing their AIs.

Waterloo and Cedar Falls worked with Mosaic Community Planning to develop this Analysis of Impediments to Fair Housing Choice. This AI follows HUD's Fair Housing Planning Guide but also incorporates elements of HUD's assessment tool established in the 2015 final rule. In some places, it uses data developed by HUD for use by grantees as part of the Affirmatively Furthering Fair Housing final rule.

DEFINITIONS

Affirmatively Further Fair Housing – In keeping with the text of HUD's 2015 *Affirmatively Furthering Fair Housing* regulation, to Affirmatively Further Fair Housing Choice (AFFH) is to take “meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.”²

Affordable – Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD's definition:

- HUD defines as "affordable" housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs. For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners' association fees.

Fair Housing Choice – This Analysis of Impediments to Fair Housing Choice uses the following definition of Fair Housing Choice:

“Individuals and families have the information, opportunity, and options to live where they choose without unlawful discrimination and other barriers related to race, color, religion, sex, familial status, national origin, or disability. Fair housing choice encompasses:

- Actual choice, which means the existence of realistic housing options;
- Protected choice, which means housing that can be accessed without discrimination; and
- Enabled choice, which means realistic access to sufficient information regarding options so that any choice is informed. For persons with disabilities, fair housing choice and access to opportunity include access to accessible housing and housing in the most integrated setting appropriate to an individual's needs as required under Federal civil rights

² “Affirmatively Furthering Fair Housing; Final Rule,” published July 16, 2015, at 80 FR 42272.

law, including disability-related services that an individual needs to live in such housing.”³

Impediments to Fair Housing Choice – As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:⁴

- 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 on the basis of race, color, religion, sex, disability, familial status, or national origin.

Protected Classes – The following definition of federally protected classes is used in this document:

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

DATA SOURCES

Decennial Census Data – Data collected by the Decennial Census for 2020, 2010 and 2000 is used in this Assessment (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- 2010 and 2000 Census Summary File 1 (SF 1) – This dataset contains what is known as “100% data,” meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.
- 2000 Census Summary File 3 (SF 3) – Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed

³ 24 CFR Part 5.151.

⁴ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3 dataset was discontinued for the 2010 Census, but many of the variables from SF 3 are now included in the American Community Survey.

American Community Survey (ACS) – The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census's SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- ACS Multi-Year Estimates – More current than Census 2020 data, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 1-year estimates. The 2018-2022 ACS 5-year estimates are used most often in this report.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) – HUD's AFFH Data and Mapping Tool provides a series of online, interactive maps and data tables to assist grantees in preparing fair housing analyses. Topics covered include demographics and demographic trends; racial and ethnic segregation; housing problems, affordability, and tenure; locations of subsidized housing and Housing Choice Voucher use; and access to educational, employment, and transportation opportunities. This report uses HUD's latest data and maps, AFFHT0006, which was released in July 2020. HUD's source data includes the American Community Survey (ACS), Decennial Census / Brown Longitudinal Tract Database (BLTD), Comprehensive Housing Affordability Strategy (CHAS), Longitudinal Employer-Household Dynamics (LEHD), HUD's Inventory Management System (IMS) / Public and Indian Housing (PIH) Information Center (PIC), and others. For a complete list of data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation available online at:

<https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-DataDocumentation-AFFHT0006-July-2020.pdf>

CHAPTER 2. COMMUNITY PARTICIPATION PROCESS

COMMUNITY ENGAGEMENT OVERVIEW

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in the cities of Waterloo and Cedar Falls. The project team used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including community meetings, focus groups, pop-up engagement, stakeholder interviews, and a community-wide survey.

Resident Meetings

Three in-person meetings open to the general public were held to inform residents about and gather information for the Analysis of Impediments to Fair Housing Choice. Two of the meetings were offered in the evening and targeted to members of the general public; one in each of the cities. The third public meeting was held during the day and targeted to service providers and stakeholders. Each of the meetings consisted of a short presentation providing an overview of the AI followed by an interactive discussion of fair housing, neighborhood conditions, and community resources in Waterloo and Cedar Falls. To encourage participation, meeting flyers advertised the meetings as having refreshments. Meeting notices also included instructions on how to request language services or other accommodation, however no accommodation or interpretation requests were received. Dates, times, and locations of the two public meetings offered are shown below:

Cedar Falls Resident Meeting

Tuesday, November 28, 2023

5:30 – 6:30 PM

Hearst Center

304 W Seerley Boulevard

Cedar Falls, IA 50613

Attendees: 11

Service Provider Public Meeting

Wednesday, November 29, 2023
3:00 – 4:00 PM
Waterloo Center for the Arts
225 Commercial Street
Waterloo, IA 50701
Attendees: 16

Waterloo Resident Meeting

Wednesday, November 29, 2023
5:30 – 6:30 PM
Cedar Valley SportsPlex
300 Jefferson Street
Waterloo, IA 50701
Attendees: 7

Focus Groups

In addition to the public meetings, four focus groups were held to collect input from groups of residents with specific backgrounds and unique perspectives on fair housing. As with the public meetings, these groups typically began with a brief explanation of the Analysis of Impediments to Fair Housing Choice. The focus group leader then facilitated a discussion of fair and affordable housing needs, neighborhood conditions, and community resources in the county. In most cases, the AI project team worked with local agencies and organizations to host and promote the focus groups to their respective members or clients, resulting in a total of 27 participants. To incentivize participation, focus group participants were given gift cards as a token of thanks for their time and input.

A list of the focus groups with their sponsoring organizations is provided below:

- **Focus Group #1: People with Disabilities**
Sponsor: Exceptional Persons, Inc.
Participants: 6
- **Focus Group #2: Low/Mod Income Renter Households**
Sponsor: Iowa Heartland Habitat for Humanity
Participants: 5
- **Focus Group #3: Senior Citizens**
Sponsor: Ridgeway Towers (Waterloo Housing Authority)
Participants: 6



- **Focus Group #4: LEP Immigrant Communities**
Sponsor: World Grace Project
Participants: 10

The selection of these focus groups was strategic and intended to collect input from residents likely to have had unique challenges accessing housing and/or experiences with housing discrimination.

Pop-Up Engagement

The planning team conducted 5 pop-up engagement activities wherein facilitators informally engaged with residents in community locations, generally not as a part of any particular event. Pop-up engagement is useful for raising awareness around the project and obtaining input from residents who may not be sufficiently tuned into fair housing issues that they would attend a meeting on the subject, but who have opinions to share nonetheless. By canvassing at high-traffic locations such as libraries, grocery stores, and food pantries, the planning team engaged 117 residents in the AI.

- **Pop-Up #1: Cedar Valley Food Pantry**

Tuesday, November 28; 1:30-2:30 PM

Response: 26 residents engaged with planning team members in short conversations about community needs and housing challenges before beginning their shopping at the food pantry. Additionally, food pantry workers included hard copy surveys with postage-paid return envelopes in shoppers' grocery bags upon checkout.

- **Pop-Up #2: Cedar Falls Library**

Tuesday, November 28; 3:00-3:45 PM

Response: 19 Cedar Falls residents engaged in a short conversation about community needs and housing challenges in the library's lobby as they were entering or exiting the building.

- **Pop-Up #3: Central Bus Station**

Wednesday, November 29; 10:00-11:00 AM

Response: 9 residents engaged in a short conversation about community needs and housing challenges while waiting at the bus station or as they were transferring between buses.

- **Pop-Up #4: Salvation Army of Waterloo/Cedar Falls**

Wednesday, November 29; 11:00 AM – 1:00 PM

Response: During the Salvation Army's lunch program, 53 residents completed a survey; some engaged in further discussion of housing issues with planning team members.

- **Pop-Up #5: All-In Grocers**

Thursday, November 30; 12:30-1:30 PM

Response: Through interactive activities set up in the grocery store's Willie Mae Wright Community Room and canvassing in the store's parking lot, 10 residents spoke with planning team members about community needs and housing challenges.

Stakeholder Interviews

The planning team engaged with stakeholders representing a variety of perspectives through in-depth individual interviews. Interviews typically lasted 45 minutes to one hour and included discussions about barriers to fair housing, discrimination, access to opportunity, and fair housing resources. Twenty-two (22) community stakeholders participated in interviews with the planning team. Participating stakeholders represented a range of viewpoints, including affordable housing, community development and planning, education, health services, homelessness services, senior services, family services, people with disabilities, and others. Participants included representatives from the following organizations, agencies, and institutions:

- Bakari Behavioral Health
- Black Hawk County Emergency Management
- Black Hawk County Environmental Health
- Black Hawk Grundy Mental Health Center
- Cedar Falls Community Services
- Cedar Falls Human Rights Commission
- Cedar Falls Planning & Zoning
- Cedar Falls Utilities
- College Hill Partnership
- Delaton, LLC
- Exceptional Persons Inc.
- Hawkeye Community College
- Iowa Heartland Habitat for Humanity
- NAACP of Black Hawk County
- Northeast Iowa Food Bank
- Salvation Army of Waterloo/Cedar Falls
- Social Action, Inc.
- TEAM Real Estate Group
- Unity Presbyterian Church - Waterloo
- Waterloo Housing Authority
- Waterloo Neighborhood Services
- Waterloo School District

Project Website

The project website, WaterlooCedarFallsHUD.com, provided information about the study, linked to the community survey, promoted public meetings and events, and directed residents to local and national fair housing resources and information. Over the course of the project, the site received 57 unique visitors and 498 interactions (i.e., session starts, pageviews, clicks, etc.).

Community Survey

Another method for obtaining community input was a survey available to the general public, including people living and/or working in Waterloo or Cedar Falls and other stakeholders. The survey was available from November 2023 through January 2024 via the project website and online link. The planning team collected hard copy survey responses through a collection box placed at the Cedar Falls Library and through collaboration with nonprofit service organizations. For example, 53 hard copy responses were completed and returned during a pop-up event at the Salvation Army's lunch program, and organizations including the Cedar Valley Food Bank and World Grace Project distributed surveys with postage-paid return envelopes to their clients. A total of 361 survey responses were received, 200 from Waterloo residents and 161 from people residing in Cedar Falls.

Publicity for Community Engagement Activities

Advertisements for the AI planning process and related participation opportunities were targeted the general public, as well as nonprofits, service providers, housing providers, and others working with low- and moderate-income households and special needs populations. Public notice of community engagement opportunities was given to residents through news announcements on the project website (WaterlooCedarFallsHUD.com), social media, and a public notice published in the *Waterloo-Cedar Falls Courier*. A press release distributed to local media outlets resulted



in feature stories by the local CBS News affiliate and by Iowa Public Radio. Project flyers were emailed to contact lists maintained by Waterloo and Cedar Falls including people and organizations representing a variety of viewpoints, including elected officials and staff, local government agencies, housing authority staff, housing developers, nonprofit organizations, homeless housing and service providers, mental health service providers, organizations serving

people with disabilities, family and senior services, workforce development organizations, and others. Cedar Falls also included a post about the project in its employee newsletter. In all meeting advertisements, information for anyone needing language services or other accommodation was provided, but none were requested.

COMMUNITY ENGAGEMENT RESULTS

Input collected through the project's community engagement process is summarized below. To structure the process, the planning team developed a standard question set for use in public meetings, focus groups, pop-ups, and interviews. Listed below are the summarized comments from interview participants and meeting/focus group attendees, as well as a summary of survey results. All input was considered in the development of this AI, and no comments or surveys were not accepted. Comments are presented here without information identifying the commenter's identity or the organization they represent. Note that these are comments from private individuals and do not necessarily reflect the views of any organization, agency, or the city governments of Waterloo or Cedar Falls.

Cedar Falls Resident Meeting

1. What types of housing needs are greatest in Cedar Falls?

- Workforce housing; Cedar Falls needs reasonably priced housing for the local workforce.
- Currently, Cedar Falls workers are priced out and live in rural areas or in Waterloo.
- There should be rent caps to protect against the market effects of students from out of state who are renting housing in the city.
- Affordable senior housing in apartment-like communities.
- Need to work on negative perceptions of the households in need of more affordable housing options; not all Section 8 tenants are "riff-raff".
- A mixed income strategy to housing is important.
- Inclusionary housing is a good idea: there should be requirements or incentives to incorporate affordable housing into new developments
- Affordable housing should still have high design and construction standards; just smaller unit sizes.
- Retirement communities in Cedar Falls are not affordable.

2. What do you believe are the City's greatest community development needs?

- Transportation improvements connecting to Waterloo and other cities.
- Subsidies for the cost of public transportation.
- Transportation options for senior citizens.
- Sidewalks; investments in walkability helps with the transportation issue.

- As new subdivisions are being developed on the west side of the city, is Cedar Falls making sure they're putting in the necessary sidewalks and infrastructure?
- Affordable childcare centers and programs; support existing organizations such as the YWCA.
- Mental health treatment and facilities; therapy programs.
- A walk-in mental health clinic that could serve all income levels.
- Could College Square Mall be repurposed for affordable housing, childcare, and mental health? A one-stop location could serve so many needs.
- There is a pedestrian crossing over University to the Hy-Vee, but you have to be brave; some sort of bridge would be safer, but would need to be accessible.

3. Are there barriers other than income/savings someone might face in moving to areas of opportunity in Cedar Falls?

- There is a lack of diversity in housing/unit types.
- Affordability is the biggest barrier – housing is just too expensive for some.
- Not many properties are available for infill construction.

4. Are you aware of any housing discrimination?

- Real estate agents have been known to steer people to certain neighborhoods.

5. Are people in Cedar Falls segregated in where they live? What causes this segregation to occur?

- There are “historical leftovers”, for example, racial covenants that were used in Cedar Falls.
- The Lincoln school district is more diverse than other parts of the city.
- North Cedar Falls is considered by many to be “low-income”.
- Current tree cover tends to follow historic redlining boundaries.

Waterloo Resident Meeting

1. What types of housing needs are greatest in Waterloo?

- Waterloo needs more affordable housing stock accessible to people with disabilities, including seniors too.
- Apartments tend to be in bad repair, quality is an issue.
- Often there are lots of steps to physically access an apartment in Waterloo, which is an accessibility issue.
- Waterloo has an image problem, and its housing conditions are part of that.
- New housing construction as well as housing rehab – both are needed.
- In the north end of Waterloo, there is a need for rehabilitation and demolition.

2. What do you believe are the City's greatest community development needs?

- A community center is needed.
- Sidewalks are a big need in Waterloo.
- Support for senior centers and activities.
- New developments in Waterloo have sidewalks, but there are gaps where older developments are located.
- Sidewalks without ramps are a problem, requires better planning.
- The City has done a good job building trails for recreational use, but they're not useful for commuting; they don't connect to places you'd need to go to access jobs.
- Crossroads Mall is a "white elephant", something needs to be done with it to return it to use.

3. Are there barriers other than income/savings someone might face in moving to areas of opportunity in Waterloo?

- Waterloo has decent schools, but they are spread out; this may present busing issues for some families.

4. What recent housing or community development initiatives have been especially successful in the City? What made them successful? How/where can they be replicated?

- City government is trying to do better and work to reset the image of Waterloo.
- The Positively Waterloo campaign may be too rosy though. There can be such a thing as "toxic positivity" where issues are overlooked or ignored rather than dealt with. It would be better to just say, yes, we have some problems in Waterloo and here's how we are working to solve them.

5. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? Who offers them? How well are they coordinated with the work of other organizations in the community?

- House of Hope does some training; it could be expanded.
- The Waterloo Human Rights Commission used to do more.
- Operation Threshold has some help, including education on homebuying.
- There is a need for more programs in this area.

6. Are you aware of any housing discrimination?

- Yes, see the 24/7 Wall Street report: "The Worst Cities for Black Americans".

7. Are people in Waterloo segregated in where they live? What causes this segregation to occur?

- There is some social-based self-segregation; it's not imposed on anyone.

Service Provider Public Meeting

1. What types of housing needs are greatest in Waterloo and Cedar Falls?

- Cedar Falls needs workforce housing, construction of homes for homebuyers.
- Quality of new housing construction is important; the need is for quality affordable, single-family homes.
- Financial assistance to homebuyers
- Rehab and repair programs for homeowners, especially porches and roofs.
- Hoarding situations are problematic, as are pest control issues; these can negatively affect the affordable housing supply.
- Waterloo has approximately 100 residents who are homeless; rental assistance and case management would help the situation.
- Permanent supportive housing is a need as well.
- Mitigation funds for landlords would allow them to accept riskier tenants with credit issues and/or eviction history; otherwise, it is very difficult for these people to find housing.
- Encounters with the criminal justice system, to include felony convictions, sex offences, and substance abuse, are frequently disqualifying from all types of housing.
- Landlords who do not maintain their rental properties should be scrutinized, especially when they blame the repair needs on the tenants.
- When a tenant reports a maintenance issue to their landlord, the landlord may evict them and rent the unit to someone less likely to complain rather than simply repair the issue.
- Homeowners are forced out by rising costs.

2. What do you believe are the Cities' greatest community development needs?

- Sidewalks are lacking; the elderly can't safely walk around their communities.
- There is a need for greater walkability, greenspace, and natural areas.
- Food deserts limit grocery options.
- Demolition of dilapidated buildings would help address blight.
- Youth activities and employment opportunities are needed.
- Establish career ladders, beginning with training opportunities and transitioning to full time jobs.
- Transportation needs are important.
- Don't divert homeless funding to a focus solely on prevention; Waterloo has 100 people experiencing homelessness and they need housing.

3. What recent housing or community development initiatives have been especially successful in Waterloo/Cedar Falls? What made them successful? How/where can they be replicated?

- The Summerland Twinhomes development is a good example of new townhome-style housing that has been built in Waterloo.
- Unity Square townhomes in Waterloo is another good example. They are attractive and affordable.

- Rapid rehousing paired with case management is a proven model. Rental assistance programs have been shown to drive down homelessness.
 - In Iowa City, bus service is free of charge. A similar model could be helpful for people in Waterloo and Cedar Falls.
- 4. Are there new uses of HUD grant funds you wish the Cities would consider? Are there gaps in the programs you are currently offering that could be filled with additional funding?**
- Funds are available but often tied to very specific populations or needs. For example, homelessness funding specifically tied to a diagnosis of opioid abuse.
 - Assistance for people who own mobile homes where landlords are driving up lot rents.
 - Invest in developers who are local and who live here.
 - The Human Rights Commission needs additional staff.
- 5. What parts of the Waterloo and Cedar Falls are generally seen as areas of opportunity (i.e. places people aspire to live, places that offer good access to schools, jobs, and other amenities)? What makes them attractive places to live? Are there barriers other than income/savings someone might face in moving to one of these areas?**
- Audubon Park in Waterloo is an example. It's got large homes, lots of space, and is close to healthy food options, but is also somewhat isolated and not affordable. Income would be a barrier to living there.
 - People without cars will always have limited housing options because the buses don't serve all neighborhoods. The system also has infrequent service.
- 6. Are you aware of any housing discrimination?**
- There is steering of both home buyers and renters; the local real estate profession is not racially diverse.
- 7. Are people in Waterloo/Cedar Falls segregated in where they live? What causes this segregation to occur?**
- There is a concentration of people of color in northeast Waterloo; these are historically redlined districts.
 - Racism is alive and well. There's a negative narrative about Waterloo – people are told to stay away.
 - Just look at the comments on any KWVL story; there are unfounded perceptions about crime and safety in Waterloo.
 - Affordable housing development in existing low/mod neighborhoods keeps people segregated.
 - Stratification of job opportunities works to keep segregation in place.
 - The east side and West Waterloo are relatively well integrated communities.
 - The Human Rights Commission works specifically with fair housing and holds seminars.
 - Legal Aid is another big one working with fair housing.

Stakeholder Interview Results

1. What types of housing needs are greatest in Waterloo and Cedar Falls?

- Older neighborhoods are more affordable but many are in bad condition.
- Housing stock in Waterloo in general is in poor condition – there is a big need for higher quality housing.
- Rental conditions are the largest issue – need for major overhaul of regulations and conditions.
- Slumlord issues – not enough regulations or oversight for landlords.
- There is essentially one code enforcement officer in all of Waterloo – not enough capacity to make sure units are meeting requirements.
- Lack of developers to replace housing when the city demolishes blighted properties.
- There is a problem with landlords keeping properties in bad condition and discriminating or retaliating against tenants who push for repairs.
- Cedar Falls is a college town and that impacts rental supply and also rental conditions as landlords know they can get away with keeping college housing in worse condition.
- Local families cannot compete on price with a group of college students for rentals.
- There is need for education on tenant rights and responsibilities.
- Housing can be more difficult to acquire for LEP residents – they are more often taken advantage of and need programs to connect them to resources
- Strong need for more affordable homeownership opportunities.
- Need for more housing rehabilitation and repair programs – it would be preferable to rehab existing housing rather than demolishing it and rebuilding new.
- Lead paint mitigation assistance continues to be a need.
- People in their early 60s are a big population segment and need more senior housing communities.
- Need for aging-in-place programs to help seniors rehab and maintain their aging homes and pay property taxes.
- There are lots of senior options but not for low income seniors.
- Need to make existing homes more ADA accessible.
- More landlords that accept Section 8 – some landlords don't want to put in the time and money to maintain units to Section 8 standards.
- Waterloo specifically should seek to increase multifamily housing for ownership instead of for rent.
- Affordable multifamily smaller units
- There is a need for more variety in housing types in general
- Zoning changes could help encourage more diverse housing options, but there is a lot of NIMBY sentiment about it in the community.
- Shared housing situations for people exiting homelessness help them find roommates so they can afford housing.

- Big need for transitional housing and supportive services for people leaving incarceration or hospitalization.
- The region does not have enough emergency shelter capacity – existing shelters have waiting lists.

2. What parts of the region are generally seen as areas of opportunity (i.e. places people aspire to live, places that offer good access to schools, jobs, and other amenities)? What makes them attractive places to live? Are there barriers someone might face in moving to one of these areas?

- In Waterloo, areas of opportunity would be the Kingsley school district, Orange school district, Lou Henry school district, Audubon, Sunnyside Country Club, and Prospect Boulevard.
- Southern and Western Waterloo are more desirable; Highland is an area of opportunity; Kingsley and West High School districts are good.
- Houses in Prospect are generally larger and newer and can be more expensive. The average blue-collar worker cannot afford the neighborhood.
- The Prospect Boulevard area is desirable. It has some mostly older but well-kept starter houses, with a nice school and amenities.
- South part of Waterloo is more desirable – North side needs revitalization.
- The East side of Waterloo gets a bad reputation but the city is starting to revitalize it so there are some newer homes going in.
- Kittrell Elementary is much more racially and ethnically integrated than Kingsley – many Black or Muslim students, many refugee students
- Some of the previously less desirable neighborhoods are revitalizing and becoming more desirable.
- The Walnut and Church Row neighborhoods have had a lot of work from Habitat and that makes them desirable.
- Cedar Falls in general is considered more economically advanced and desirable than Waterloo and is also very white in comparison, which leads to NIMBYism.
- There is a long-held Cedar Falls bias against Waterloo – Waterloo is much more racially, ethnically, and economically diverse.
- Cedar Falls is a university city and so has higher property values and better amenities.
- Within Cedar Falls everything is pretty equal.
- Cedar Falls has more investment in schools and lower rates of crime.
- The public's perception is that Cedar Falls is more desirable than Waterloo – safer, whiter, better schools.
- Cost is by far the biggest factor preventing people from accessing these areas of opportunity – people generally live in the best place they can afford.
- Lack of rental options is the biggest barrier in the nicer areas.
- There are no thoroughfares through the Prospect neighborhood for walkers or cyclists; this could be a barrier for people without a car.
- The "good neighborhoods" aren't affordable.
- Desirability is related to proximity to shopping, schools, and hospital.

- New developments are generally desirable, but expensive.
- The Manson District (East 4th St to East High) is very low cost – as low as \$30k for a house – but higher crime, fewer resources, buildings in bad condition.
- Schools and neighborhood maintenance are factors that may keep someone from choosing an otherwise desirable neighborhood.
- Audubon is a higher cost area that is nice and has low crime, but many people can't afford to live there.

3. Are public resources (e.g. parks, schools, roads, police & fire services, etc.) available evenly throughout all neighborhoods in your community?

- The cities try to make keep resource distribution even but it's not perfect.
- Things seem pretty even throughout the Cedar Valley.
- East Waterloo is generally lower income, Black or immigrant, and has fewer resources.
- People in downtown Waterloo or in the Church Row district who don't have cars walk along Hammond Avenue or Ridgeway Avenue to Walmart. These are major roadways with no sidewalks and no Sunday bus service. It's dangerous, especially for children who walk home from school that way.
- Cedar Falls is easier to get around than Waterloo in regard to transportation.
- Roads are pretty evenly distributed.
- There are some neighborhoods in both cities that don't have access to great schools.
- There are some elementary and middle schools in the area with nice facilities but there is still a need for more resources supportive programs for students and families.
- Police in Waterloo devote more patrol hours to areas with more frequent calls.
- Fire and police services are high quality doing and all neighborhoods have access to them.
- Cedar Falls has combined police and fire recently which was a hot topic; police officers are required to be trained for fire.
- Some fire stations have closed recently and that could be a problem, especially in northern Cedar Falls and some parts of Waterloo.
- Plenty of parks all over but the quality is inconsistent.
- Parks in some neighborhoods have older equipment.
- Good parks are not evenly distributed; some of the neighborhood associations are pushing for more and better parks.

4. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices? Are you aware of any housing discrimination?

- Finding family-sized housing can be an issue – no one can afford a large house in a nice area.

- Many immigrant families are larger and/or intergenerational and need larger housing units with more bedrooms.
- Large families may be limited in where they can find large housing.
- There are plenty of larger homes available for larger families in Waterloo, but the affordable ones are in such bad condition they aren't good to live in.
- Transportation access is definitely a barrier – there isn't a good public transit system and many of the large employers in the area aren't accessible by public transit.
- There aren't sufficient transit options, so people without a car may be limited in where they can live.
- The part of north Waterloo referred to as “East Side” has stigma that it's low income and undesirable.
- Some HOAs are restrictive and may impact housing choice.
- Some landlords may make people of certain races or ethnicities feel unwelcome.
- Racial discrimination/feeling unwelcome is definitely a factor that may limit housing choices.
- A friend who is Black experienced people taking photos of him walking around his own neighborhood. He eventually moved to another state because he felt he could not safely raise Black children in Waterloo.
- Many jobs preferentially hire white people over people of color, and this contributes to affordability and income disparities.
- LGBTQ+ people, especially gender non-conforming, face issues finding housing and may have to get someone else to rent for them.
- Affordability is the biggest barrier keeping everyone from having equal housing choices.
- Rental history discrimination is also a barrier – landlords have stricter requirements since the pandemic eviction moratoriums.
- Population is aging and affordable disability-accessible housing is hard to find, especially in Waterloo.
- Very hard to find people who will build ramps at a reasonable rate.
- Most programs in place to help with accessibility issues are exclusive to veterans.
- ADA compliance is an issue and can impact housing options.

5. Are people in the area segregated in where they live? What causes this segregation to occur?

- Clustering does happen, a lot has to do with the cost of housing.
- Some areas are more mixed than others but there isn't any intense segregation.
- People sometimes cluster near churches that serve their race or culture.
- “Affordable” areas are less white.
- Segregation is more by class than race.
- There is still a high level of segregation stemming from historic redlining policies.
- Waterloo is very ethnically diverse but still very clustered; the clustered populations don't want to integrate.

- Many houses in the area have original deeds that specify that they will never be owned by “unfavorable” people and list races or ethnicities that the house cannot be sold to.
- Church Row area and Walnut neighborhoods have more immigrant populations.
- There is some clustering of LEP populations, especially immigrants. People want to live within their own community and near family.
- Around 4th street in Waterloo is a large Bosnian and Burmese population; North Waterloo has a Congolese population.
- There is a community of African immigrants who live near the Mercy One hospital.
- Immigrant populations definitely cluster to maintain community; some areas have grocery stores serving particular cultural needs.
- Immigrants may be more comfortable living in neighborhoods with people who share their language and culture.
- Segregation may also be driven by job opportunities – many African immigrants are working in the healthcare industry, while many Hispanic immigrants work in manufacturing – people will try to live near their work.
- There are not many minorities in Cedar Falls in general; they tend to feel less welcome there than in Waterloo.
- In Waterloo there is racial clustering on the northeast end.
- Waterloo has a large Black population stemming from replacement workers brought in for historic railroad strikes.
- When strikes ended, the Black workers were replaced with white workers and it has led to historic disinvestment in Black communities due to lack of resources.
- Historically the “east side” was the first area that allowed Black residents – the triangle between 4th St, Mobile St, and the railroad – and is still largely Black.
- Waterloo is beginning to experience a little bit of white flight in some areas where Black residents are starting to move in.
- Racial discrimination is more hidden – looks more integrated but people still find ways to not socialize with each other.
- Waterloo recently elected a Black mayor and this has sparked some more overt racism.

6. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?

- Human rights commissions and Iowa Legal Aid are very active in the area.
- The Human Rights Commission works specifically with fair housing and holds seminars.
- Legal Aid is another big one working with fair housing.
- The Cities offer some classes and workshops but not sure on details.
- Operation Threshold provides some housing education.
- There is somewhere people can go to put in landlord complaints but not sure where.

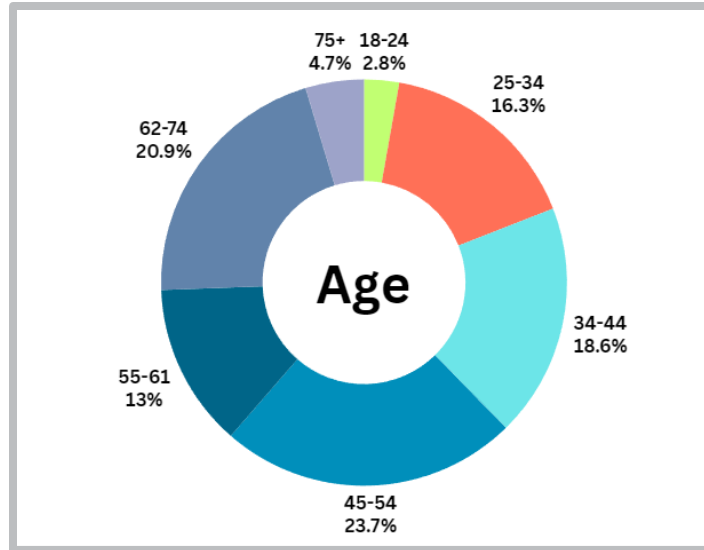
- East Side Ministerial Alliance, Hospitality House, House of Hope, Amani, and Salvation Army all provide some housing education services in Waterloo.
- Cedar Falls provides few services and tries to just send people to Waterloo to get resources.
- Licensed real estate agents promote fair housing resources to their clients.
- The Salvation Army frequently refers clients to Legal Aid.
- Fair housing enforcement technically exists but it is very ineffectual – seems like Waterloo especially just doesn't care.
- Waterloo has a Human Rights Commission that will sometimes get involved in housing but doesn't have much enforcement power.
- Coordination can always be improved. Some services need better advertising.
- Cedar Falls has a newly hired Diversity & Inclusion Specialist.
- People needing help with mediation or lawsuits can be referred to Iowa Civil Rights Commission.
- An organization called "Leak Your Landlord" allows people to share information on bad landlords.
- More collaborative work is needed.
- There is a Housing Action Team that recently formed that works with code enforcement.

Community Survey

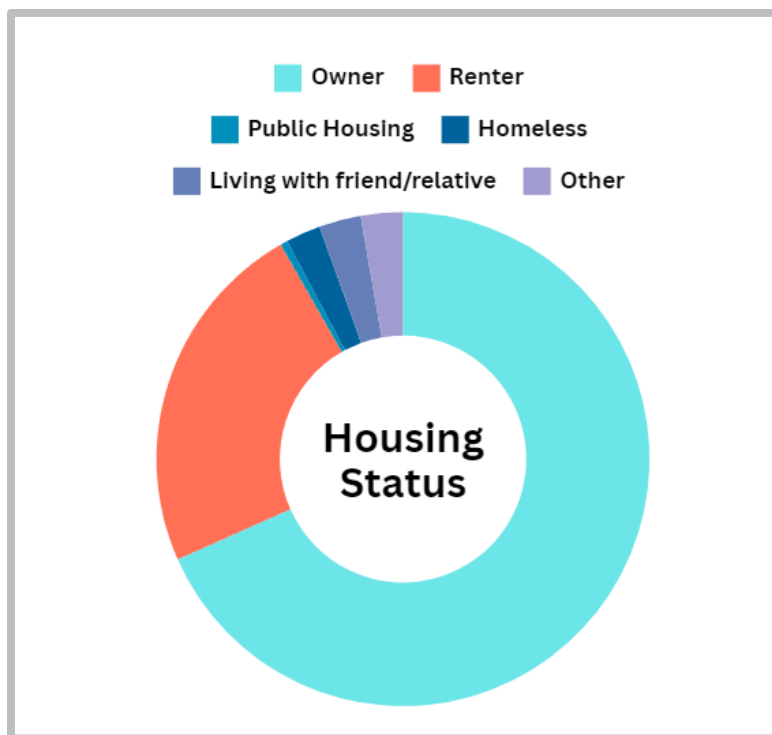
The community survey consisted of two identical parts; one for people familiar with housing and needs in Waterloo, and one for those more familiar with Cedar Falls. The two survey components were linked, allowing respondents completing the version for one city to return to the beginning and take the other city's version of the survey. A total of 361 people responded to the survey. Of those, 200 completed the Waterloo version and 161 completed the Cedar Falls version. The following includes a sample of survey questions and their responses. Complete results are provided as an appendix to this report.

PARTICIPANT DEMOGRAPHICS

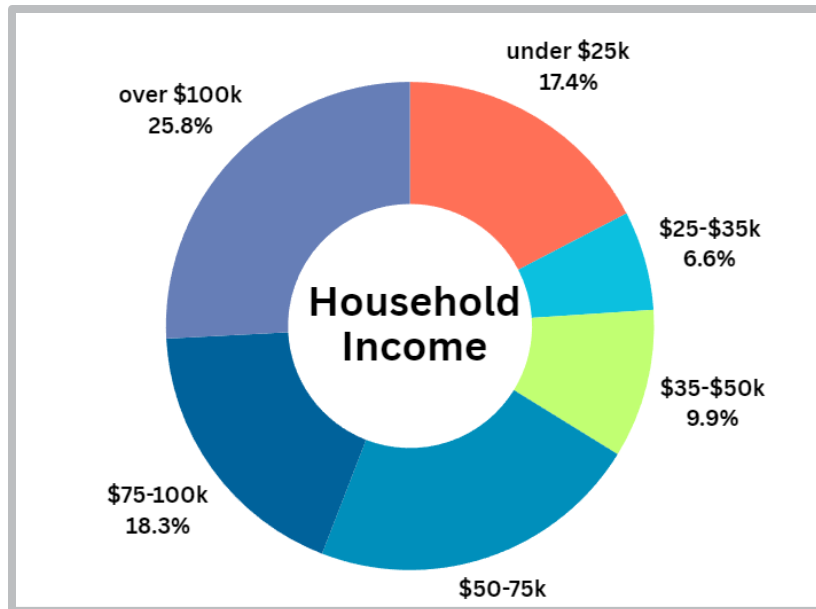
The age group with the largest share of respondents was 45-54, which comprised 23.7% of respondents, followed by age 62-74, which comprised 20.9% of respondents. When including the group of those aged 55-61 (13% of respondents), well over half of those who took the survey fell into the 45-74 age range. Younger respondents between the ages of 18 and 44 made up over a third of the survey sample.



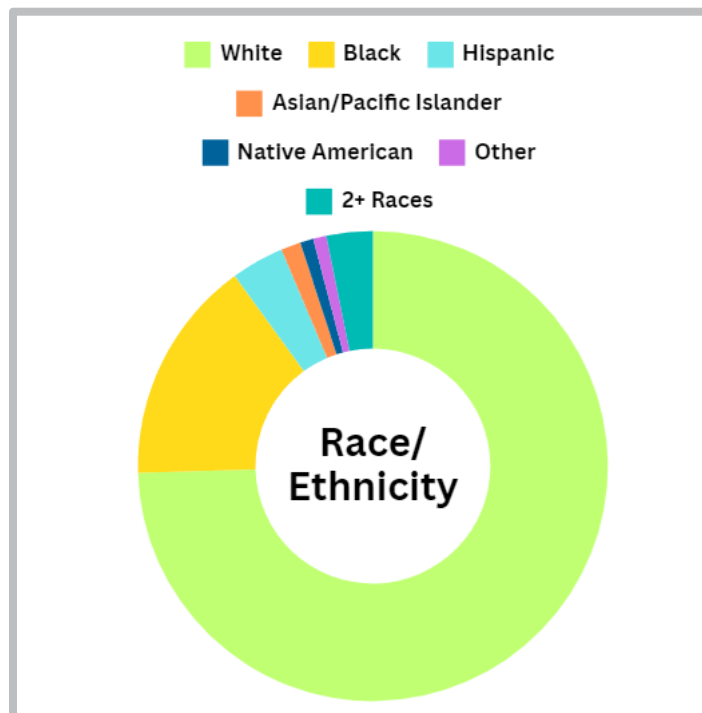
More than two-thirds (68.3%) of survey respondents were homeowners, while 23.4% were renters. Those who reported they were homeless or living with a friend or relative combined to make up 5.1% of respondents.



The largest share of respondents (25.8%) indicated their household incomes exceeded \$100,000. Those with incomes ranging from \$35,000 to \$100,000 made up 50.3% of respondents and just under a quarter (24.0%) had household incomes of \$35,000 or less.

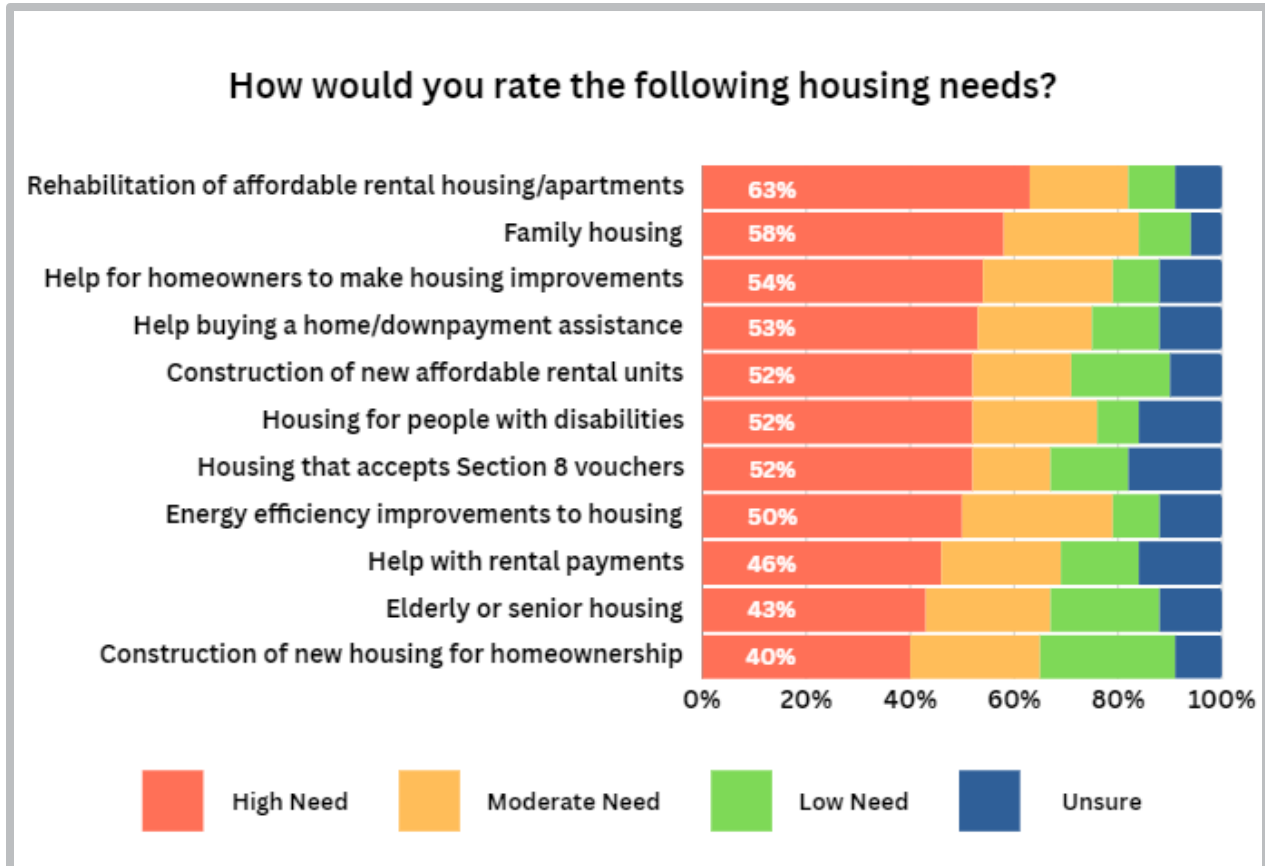


Of the respondents who provided their race and/or ethnicity, 74.5% identified as white, 15.5% as Black or African American, 1.4% as Asian or Pacific Islander, and 0.9% as Native American or Alaska Native. Those identifying as multiracial or "other" race comprised 4.1% of respondents. Of the respondents to this item on the survey, 3.6% identified as Hispanic or Latino. Race and ethnicity were combined into a single survey question with a "check all that apply" instruction, so it should not be inferred that Hispanic/Latino respondents are not also represented among the racial demographic already discussed.

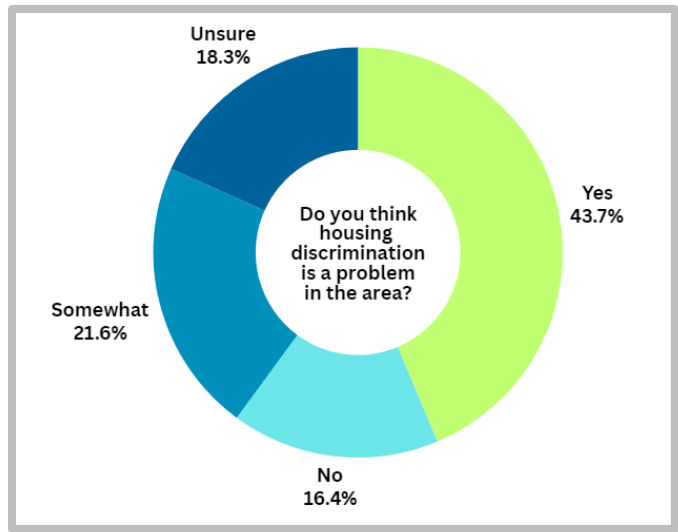


RESPONDENTS' THOUGHTS ABOUT THEIR COMMUNITIES

Asked to rate a series of housing needs in Waterloo and Cedar Falls as either high, moderate, or low needs (with an option to also indicate they were “unsure”), the greatest number of “high need” responses was to the need for rehabilitation of affordable rental housing or apartments. The need for family housing, typically referring to larger housing units with multiple bedrooms suitable for families with children, also ranked highly. followed closely by rental assistance and additional family housing. While 40% of respondents said construction of new housing for homeownership was a high need, this was the lowest-ranked of the options listed in the survey.

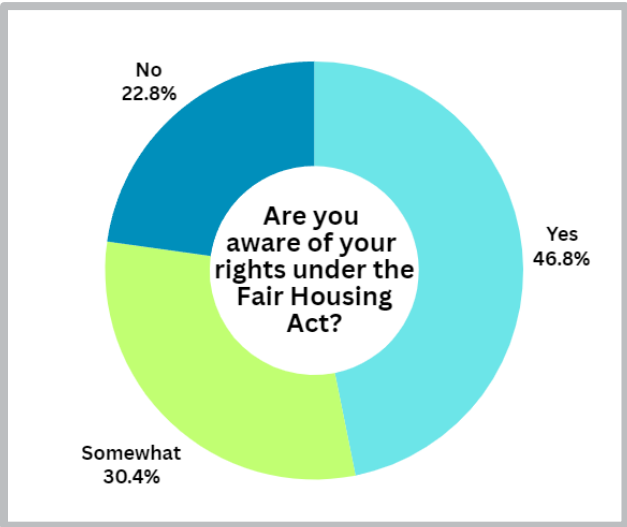


The survey asked respondents whether they believed housing discrimination was a problem affecting their community. The largest share of respondents (43.7%) said yes, followed by another 21.6% who said discrimination is “somewhat” of a problem. 16.4% of respondents indicated that they did not believe housing discrimination was a problem affecting their community, and 18.3% were unsure.

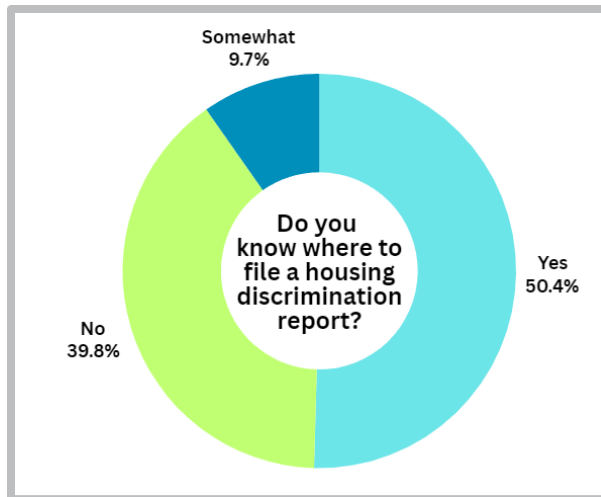


RESPONDENTS' THOUGHTS ABOUT FAIR HOUSING

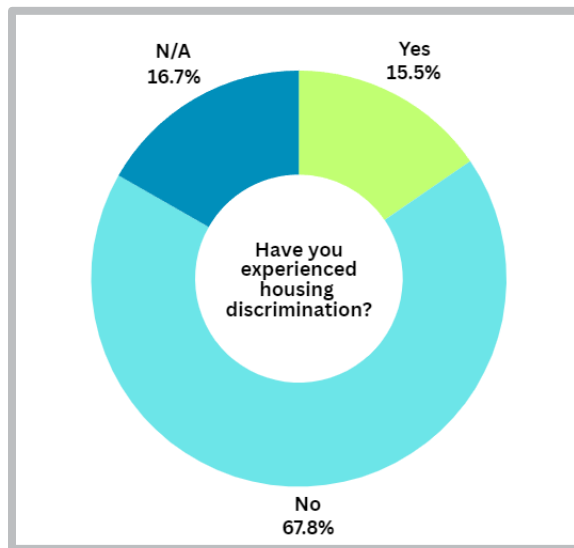
The survey included a section of questions focused on respondents' knowledge of fair housing, their potential experiences of housing discrimination, and the degree to which various issues pose barriers to fair housing choice. Only 30.4% of the respondents reported understanding their rights under the Fair Housing Act, with the remainder reporting no or only some understanding.



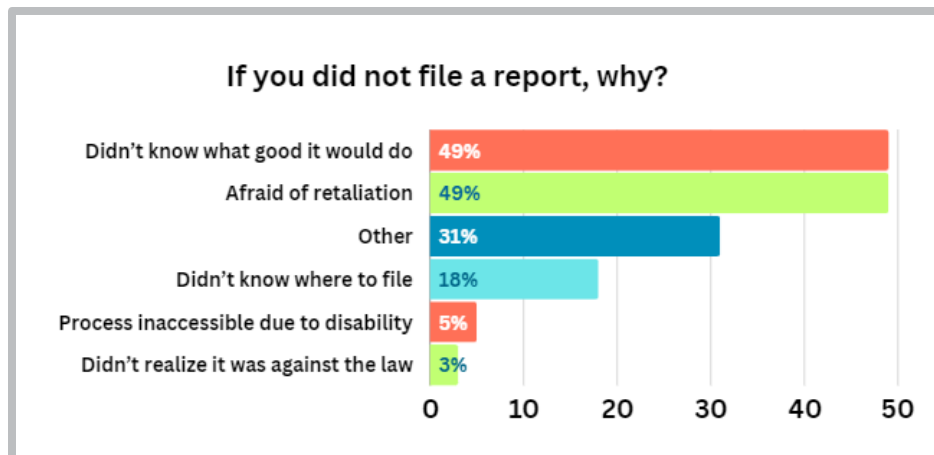
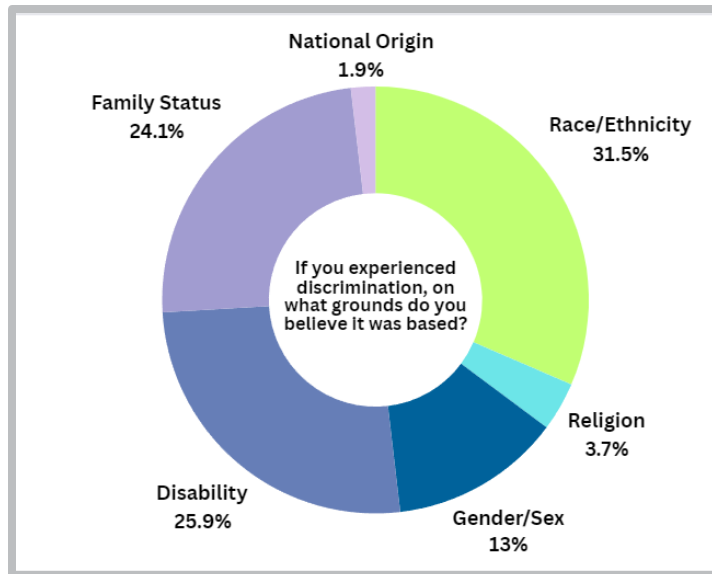
Compared to the 30.4% of respondents who reported knowing their fair housing rights, a substantially larger share (50.4%) said they knew where to file a housing discrimination complaint. Those who reported not knowing or only "somewhat" knowing where to file made up 49.5% of the respondents.



Respondents indicating they had personally experienced housing discrimination while living in or seeking housing in Waterloo or Cedar Falls made up 15.5% of the sample (39 total respondents). The remainder said either that they had not experienced discrimination (67.8%) or that the question did not apply because they did not live in or had not recently sought housing in the area (16.7%).

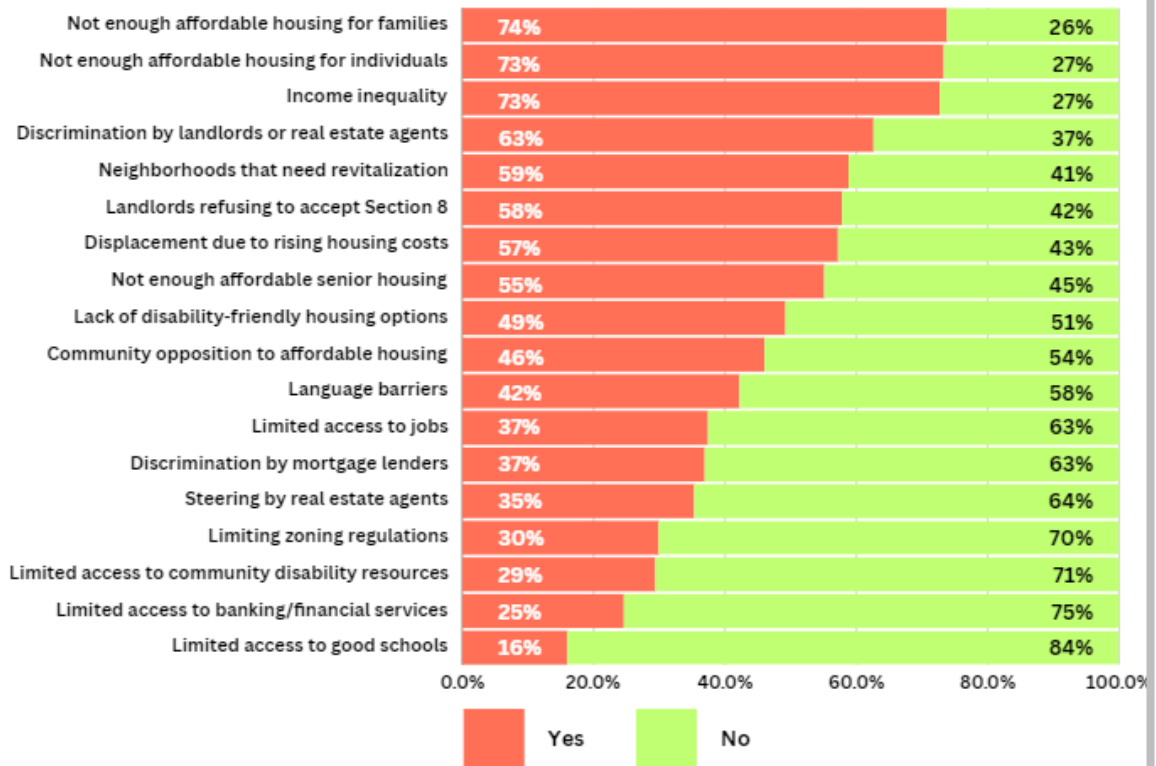


Of those 39 respondents who said they had experienced housing discrimination, race or ethnicity was reported to be the most common basis (31.5%) although disability (25.9%) and family status (24.1%) closely followed. Only 4 of the 39 said that they had filed a formal report of the discrimination to an investigatory agency. The overwhelming reasons cited by the others for not filing was because the respondent didn't know what good it would do or they were afraid of retaliation.



When provided a list of issues and asked whether they believed the listed issues may constitute barriers to fair housing choice, nearly three-quarters of all respondents identified lack of affordable housing for families, lack of affordable housing for individuals, and income inequality, at 74%, 73%, and 73%, respectively. Also prominent on the list of potential barriers was discrimination by landlords or real estate agents (63%).

Do you think the following are barriers to fair housing choice?



CHAPTER 3.

SOCIOECONOMIC

PROFILE

The combined population of the cities and counties that comprise the Waterloo/Cedar Falls HOME Consortium is 108,027 according to the most recent data from the 2020 Census. The city of Waterloo is the most populous among the two municipalities with 67,314 residents, comprising nearly two-thirds (62.3%) of the Consortium's population. Residents of the city of Cedar Falls account for the remaining 37.6% of the Consortium with a population of 40,713. Waterloo's population decreased by 2.1% since 2000 while Cedar Falls experienced population growth at a rate of 12.6%. This section more closely examines population characteristics and trends for both cities using Census and ACS data provided in Tables 1 and 2.

DEMOGRAPHIC PROFILE

Race and Ethnicity

According to 2020 Census data presented in Table 1 and the historical data in Table 2, both appearing later in the section, the majority of the populations in both Waterloo and Cedar Falls are comprised of non-Hispanic white residents. Approximately two-thirds of the population in Waterloo are non-Hispanic white (65.8%) after experiencing growing rates of decline since 2000. Black residents represent the second largest group and comprise less than a fifth of the population (17.9%) after expanding by 27% since 2000. Waterloo's Hispanic population grew by 165.4% and to comprise a population share of 7.1%. Asian or Pacific Islander residents represent 4.0% of Waterloo's population after experiencing the fastest expansion rate (346.4%) since 2000. Multiracial residents comprise a slightly larger share (4.6%) compared to Asian or Pacific Islander groups. The smallest segments of Waterloo's population are comprised of Native American residents and residents who identify as some other race who each account for less than 1% of the population.

The racial and ethnic composition of the residential population in Cedar Falls are unlike demographic patterns found in Waterloo with a significantly smaller share of Black residents and overall smaller, more balanced shares of other racial and ethnic minority groups. Non-Hispanic white residents comprise a much larger majority (86.6%) compared to Waterloo. Black residents comprise just 3.1% of the population and is one of the smaller minority groups residing in Cedar Falls. Multiracial residents comprise the second-largest group representing 3.6% of the city's population, slightly larger in share than the Asian or Pacific Islander population (3.5%). Hispanic residents are the fifth-largest population

group in Cedar Falls comprising 2.9%. Although significantly smaller in share, the population of Black and Hispanic residents grew exponentially since 2000. The population of Asian or Pacific Islanders in Cedar Falls more than doubled to keep pace with the same segment that experienced a significantly faster growth rate in both Waterloo and Black Hawk County (228.5%).

Waterloo's population is more racially and ethnically diverse compared to Cedar Falls and Black Hawk County. Population shares of the largest racial and ethnic minority groups (Black, Hispanic, Asian, and multiracial) consistently exceed share sizes of the same groups in Cedar Falls and the county. Since 2000, Waterloo has also experienced the most drastic changes to its population's racial and ethnic composition compared to Cedar Falls and Black Hawk County.

National Origin

The population of foreign-born residents grew at a rate of 74.0% since 2000 in Waterloo, nearly doubling in share size to represent 9.3% of the city's population. The top countries of origin of the foreign-born population in Waterloo are Bosnia and Herzegovina, Mexico, Democratic Republic of Congo, Thailand, and Burma. The populations originating from Bosnia and Herzegovina is the largest foreign-born group, comprising 1.9% of the total population. Residents from Mexico and the Democratic Republic of Congo each account for 1.4% of Waterloo's total population while residents from Thailand and Burma each comprise 0.6%.

The foreign-born population in Cedar Falls is much smaller in both population (2,002) and share (4.9%) compared to Waterloo; however, the number of foreign-born residents more than doubled since 2000 outpacing the growth rate of Waterloo's foreign-born population during the same time. The top countries of origin for Cedar Falls' foreign-born population are India, Pakistan, Panama, Mexico, and Korea. Residents originating from India and Pakistan comprise the largest segments among foreign-born populations, representing 0.9% and 0.8% of the total population, respectively. Residents from Panama comprise 0.4% of the population while Mexico and Korea each represent 0.3% of the residential population in Cedar Falls.

Limited English Proficiency (LEP)

Population dynamics for residents with limited English proficiency (LEP) often resemble those of foreign-born residents in a community. The population change among the LEP population in Waterloo follows a similar pattern to that of their foreign-born population; however, the inverse is found among the LEP population in Cedar Falls.

The LEP population in Waterloo accounts for 6.5% of the total population after growing at a rate of 55.7% since 2000. Population share of the LEP population in Waterloo grew by 2.7 percentage points between 2000 and 2020. LEP residents who speak other Indo-European languages comprise 2.8% of the total population and represent the largest language group among the LEP population. Spanish speakers are the second-largest LEP language group and account for 1.9% of Waterloo's residential population. LEP residents who speak Asian or Pacific Island languages comprise 1.6% of Waterloo's population.

Black Hawk County saw comparable rates of growth, with Waterloo's Limited English Proficiency (LEP) population making up a significant majority (84.3%) of the county's overall LEP population.

Conversely, the LEP population residing in Cedar Falls did not follow the same pattern as the growing foreign-born population and shrank in both size and share since 2000 at a rate of -1.4%. Notably, LEP residents who speak Spanish is only the third largest LEP language group behind groups that speak other Indo-European languages and Asian or Pacific languages.

Disability

According to the 2018-2022 5-Year American Community Survey, approximately 16.1% of the population living in Waterloo has a disability, significantly higher than the population share in Cedar Falls (10.0%) and slightly higher than the disability rate of Black Hawk County (13.8%). The most common disability type in Waterloo is difficulty with ambulatory movement. Individuals experiencing ambulatory difficulties comprise 7.4% of the city's total population. Residents experiencing cognitive difficulties constitute a slightly smaller 6.7% of the population. People with disabilities that may require extensive assistance, including independent living or self-care difficulties, make up 4.8% and 2.7% of Waterloo's population, respectively. The population of people with hearing and vision difficulties makes up 4.6% and 2.2% of the city's population, respectively.

The rate of residents who experience cognitive difficulty in Cedar Falls (18.6%) is significantly higher and more than double the rate of any other disability type within Cedar Falls, Waterloo, and across Black Hawk County. The next most common disabilities among Cedar Falls residents following are difficulty with hearing affecting 3.5% of residents and difficulty with ambulatory movement impacting 3.0% of the population. Difficulties with Independent living impact approximately 2.3% of the population followed by vision difficulties (1.5%) and difficulty with self-care (1.1%).

Sex and Female Householders

Female residents represent a slight majority and comprise similar shares in both Waterloo (51.2%) and Cedar Falls (51.7%), as well as in Black Hawk County (51.1%). Since 2000, changes to the male-to-female ratio of residents across all three municipalities are minor with the ratio shifting towards an increase in male residents over time.

The percentage of households with female householders is highest in Waterloo with approximately 35.8% of all households having a female householder. Accordingly, shares of female-led family households with children (9.6%) and without children (3.9%) are higher in Waterloo compared to Cedar Falls where 3.5% of family households with children and 1.7% of family households without children are female-led. Conversely, shares of non-family households with a female householder in Waterloo (22.3%) are lower compared to Cedar Falls (24.6%). Black Hawk County has the lowest rate of female-led non-family households with 21.4% of households falling into this category.

Household Type

Family households in Waterloo comprise approximately 27.4% of all households; a higher rate compared to Cedar Falls where 22.7% of all households are considered family households. Conversely, the rate of married couple households is higher in Cedar Falls (18.0%) compared to married couple households in Waterloo (14.1%). Similarly, non-family households comprise nearly half of all households in Cedar Falls (46.0%) compared to a smaller share of non-family households in Waterloo (42.8%).

TABLE 1 – DEMOGRAPHIC OVERVIEW

Demographic Indicator	City of Waterloo		Black Hawk County			
	#	%	#	%		
Race/Ethnicity						
Non-Hispanic or Latino	62,521	92.9%	124,696	95.1%		
White	44,321	65.8%	101,150	77.1%		
Black	12,031	17.9%	13,529	10.3%		
Asian or Pacific Islander	2,723	4.0%	4,260	3.2%		
Native American	145	0.2%	219	0.2%		
Other Race	223	0.3%	377	0.3%		
Two or More Races	3,078	4.6%	5,161	3.9%		
Hispanic or Latino	4,793	7.1%	6,448	4.9%		
Total Population	67,314	100.0%	131,144	100.0%		
National Origin						
#1 country of origin	Bosnia and Herzegovina	1,280	1.9%	Uganda	2,065	1.6%
#2 country of origin	Mexico	946	1.4%	Zimbabwe	1,944	1.5%
#3 country of origin	Democratic Republic of Congo (Zaire)	927	1.4%	Russia	1,704	1.3%
#4 country of origin	Thailand	421	0.6%	Australia	1,582	1.2%
#5 country of origin	Burma (Myanmar)	407	0.6%	Netherlands	1,545	1.2%
Limited English Proficiency (LEP) Language*						
#1 LEP Language Group	Other Indo-European languages	1,761	2.8%	Other Indo-European languages	2,159	1.8%
#2 LEP Language Group	Spanish	1,207	1.9%	Spanish	1,379	1.1%
#3 LEP Language Group	Asian and Pacific Island languages	1,023	1.6%	Asian and Pacific Island languages	1,170	1.0%
#4 LEP Language Group	Other languages	49	0.1%	Other languages	82	0.1%
Total LEP Population		4,040	6.5%		4,790	3.9%

Age					
Under 18	15,974	23.8%	28,385	21.7%	
18-64	39,886	59.3%	80,213	61.2%	
65+	11,396	16.9%	22,443	17.1%	
Disability Type					
Hearing difficulty	3,060	4.6%	5,555	4.3%	
Vision difficulty	1,479	2.2%	2,489	1.9%	
Cognitive difficulty	4,469	6.7%	1,835	1.4%	
Ambulatory difficulty	4,910	7.4%	7,483	5.8%	
Self-care difficulty	1,815	2.7%	2,638	2.0%	
Independent living difficulty	3,182	4.8%	5,071	3.9%	
Total Population with a disability	10,714	16.1%	17,954	13.8%	
Sex					
Male	32,845	48.8%	64,120	48.9%	
Female	34,469	51.2%	67,024	51.1%	
Household Type					
Family Households					
Married Couple, Children	4,069	14.1%	8,647	16.1%	
Female Householder, Children	2,792	9.6%	3,911	7.3%	
Male Householder, Children	1,078	3.7%	1,508	2.8%	
Married Couple, No Children	6,928	23.9%	14,676	27.3%	
Female Householder, No Children	1,116	3.9%	1,615	3.0%	
Male Householder, No Children	510	1.8%	921	1.7%	
Non-Family Households					
Female Householder	6,455	22.3%	11,492	21.4%	
Male Householder	5,999	20.7%	10,921	20.3%	
Total Households	28,947	100.0%	53,691	100.0%	

Note: All % represent a share of the total population within the jurisdiction or region named, except family type, which is out of total families. The most populous places of birth and languages at the city and regional levels may not be the same and are thus labeled separately.

Data Sources: 2020 Census DP1, DP05; 2018-2022 5-Year American Community Survey, Tables B05006, B11005, B18101 to B18107, S18102, S0101, S1601

Demographic Indicator	City of Cedar Falls			Black Hawk County		
		#	%		#	%
Race/Ethnicity						
Non-Hispanic or Latino		39,548	97.1%		124,696	95.1%
White		35,266	86.6%		101,150	77.1%
Black		1,245	3.1%		13,529	10.3%
Asian or Pacific Islander		1,421	3.5%		4,260	3.2%
Native American		49	0.1%		219	0.2%
Other Race		119	0.3%		377	0.3%
Two or More Races		1,448	3.6%		5,161	3.9%
Hispanic or Latino		1,165	2.9%		6,448	4.9%
Total Population		40,713	100.0%		131,144	100.0%
National Origin						
#1 country of origin	India	386	0.9%	Uganda	2,065	1.6%
#2 country of origin	Pakistan	328	0.8%	Zimbabwe	1,944	1.5%
#3 country of origin	Panama	170	0.4%	Russia	1,704	1.3%
#4 country of origin	Mexico	142	0.3%	Australia	1,582	1.2%
#5 country of origin	Korea	138	0.3%	Netherlands	1,545	1.2%
Limited English Proficiency (LEP) Language*						
#1 LEP Language Group	Other Indo-European languages	356	0.9%	Other Indo-European languages	2,159	1.8%
#2 LEP Language Group	Asian and Pacific Island languages	140	0.4%	Spanish	1,379	1.1%
#3 LEP Language Group	Spanish	128	0.3%	Asian and Pacific Island languages	1,170	1.0%
#4 LEP Language Group	Other languages	33	0.1%	Other languages	82	0.1%
Total LEP Population		657	1.7%		4,790	3.9%

Age				
Under 18	7,194	17.7%	28,385	21.7%
18-64	27,194	66.8%	80,213	61.2%
65+	6,298	15.5%	22,443	17.1%
Disability Type				
Hearing difficulty	1,397	3.5%	5,555	4.3%
Vision difficulty	596	1.5%	2,489	1.9%
Cognitive difficulty	7,509	18.6%	1,835	1.4%
Ambulatory difficulty	1,214	3.0%	7,483	5.8%
Self-care difficulty	427	1.1%	2,638	2.0%
Independent living difficulty	933	2.3%	5,071	3.9%
Total Population with a disability	4,047	10.0%	17,954	13.8%
Sex				
Male	19,655	48.3%	64,120	48.9%
Female	21,058	51.7%	67,024	51.1%
Household Type				
Family Households				
Married Couple, Children	2,780	18.0%	8,647	16.1%
Female Householder, Children	534	3.5%	3,911	7.3%
Male Householder, Children	190	1.2%	1,508	2.8%
Married Couple, No Children	4,247	27.5%	14,676	27.3%
Female Householder, No Children	260	1.7%	1,615	3.0%
Male Householder, No Children	275	1.8%	921	1.7%
Non-Family Households				
Female Householder	3,804	24.6%	11,492	21.4%
Male Householder	3,356	21.7%	10,921	20.3%
Total Households	15,446	100.0%	53,691	100.0%

Note: All % represent a share of the total population within the jurisdiction or region named, except family type, which is out of total families. The most populous places of birth and languages at the city and regional levels may not be the same and are thus labeled separately.

Data Sources: 2020 Census DP1, DP05; 2018-2022 5-Year American Community Survey, Tables B05006, B11005, B18101 to B18107, S18102, S0101, S1601

TABLE 2 – DEMOGRAPHIC TRENDS

Demographic Indicator	1990		2000		2010	
	#	%	#	%	#	%
City of Waterloo						
Race/Ethnicity						
White, Non-Hispanic	55,419	80.6%	51,254	74.9%	44,321	65.8%
Black, Non-Hispanic	9,468	13.8%	10,488	15.3%	12,031	17.9%
Hispanic	1,806	2.6%	3,827	5.6%	4,793	7.1%
Asian or Pacific Islander, Non-Hispanic	610	0.9%	881	1.3%	2,723	4.0%
Native American, Non-Hispanic	132	0.2%	145	0.2%	223	0.3%
National Origin						
Foreign-born	3,584	5.2%	4,078	6.0%	6,235	9.3%
Limited English Proficiency						
Limited English proficiency	2,594	3.8%	2,442	3.8%	4,040	6.5%
Age						
Under 18	16,964	24.7%	15,538	23.1%	15,974	23.8%
18-64	41,239	60.0%	40,298	59.9%	39,886	59.3%
65+	10,544	15.3%	11,478	17.1%	11,396	16.9%
Sex						
Male	32,985	48.0%	32,845	48.8%	32,845	48.8%
Female	35,762	52.0%	34,469	51.2%	34,469	51.2%
Household Type						
Households with children	8,791	49.5%	8,384	48.7%	7,939	27.4%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Data Sources: U.S. Census 2000 SF1 Tables P027 and P035, U.S. Census 2010 SF1 Tables P29 and P39, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released Nov 2017, <https://egis.hud.gov/affht/>

Demographic Indicator	1990		2000		2010	
	#	%	#	%	#	%
City of Cedar Falls						
Race/Ethnicity						
White, Non-Hispanic	34,207	94.6%	36,193	92.2%	35,266	86.6%
Black, Non-Hispanic	558	1.5%	794	2.0%	1,245	3.1%
Hispanic	389	1.1%	771	2.0%	1,165	2.9%
Asian or Pacific Islander, Non-Hispanic	589	1.6%	880	2.2%	1,421	3.5%
Native American, Non-Hispanic	49	0.1%	43	0.1%	49	0.1%
National Origin						
Foreign-born	975	2.7%	1,311	3.4%	2,002	4.9%
Limited English Proficiency						
Limited English proficiency	666	1.9%	801	2.1%	657	1.7%
Age						
Under 18	6,497	18.1%	7,874	19.6%	7,194	17.7%
18-64	25,030	69.9%	25,268	62.9%	27,194	66.8%
65+	4,295	12.0%	7,000	17.4%	6,298	15.5%
Sex						
Male	16,969	46.9%	19,655	48.3%	19,655	48.3%
Female	19,176	53.1%	21,058	51.7%	21,058	51.7%
Household Type						
Households with children	3,563	47.1%	3,582	44.3%	3,504	22.7%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Data Sources: U.S. Census 2000 SF1 Tables P027 and P035, U.S. Census 2010 SF1 Tables P29 and P39, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released Nov 2017, <https://egis.hud.gov/affht/>

Demographic Indicator	1990		2000		2010	
	#	%	#	%	#	%
Black Hawk County						
Race/Ethnicity						
White, Non-Hispanic	112,223	87.7%	109,968	83.9%	101,150	77.1%
Black, Non-Hispanic	10,108	7.9%	11,493	8.8%	13,529	10.3%
Hispanic	2,359	1.8%	4,907	3.7%	6,448	4.9%
Asian or Pacific Islander, Non-Hispanic	1,297	1.0%	1,860	1.4%	4,260	3.2%
Native American, Non-Hispanic	201	0.2%	209	0.2%	219	0.2%
National Origin						
Foreign-born	4,779	3.7%	5,726	4.4%	8,441	6.4%
Limited English Proficiency						
Limited English proficiency	3,461	2.9%	3,299	2.7%	4,790	3.9%
Age						
Under 18	29,545	23.3%	28,617	22.2%	28,385	21.7%
18-64	79,202	62.5%	76,969	59.7%	80,213	61.2%
65+	17,899	14.1%	23,265	18.1%	22,443	17.1%
Sex						
Male	61,458	48.0%	64,120	48.9%	64,120	48.9%
Female	66,554	52.0%	67,024	51.1%	67,024	51.1%
Household Type						
Households with children	15,515	48.5%	14,826	46.2%	14,066	26.2%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Data Sources: U.S. Census 2000 SF1 Tables P027 and P035, U.S. Census 2010 SF1 Tables P29 and P39, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released Nov 2017, <https://egis.hud.gov/affht/>

RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (RECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-white population of 50% or more. Using a metric that combines demographic and economic indicators helps to identify a jurisdictions' most vulnerable communities.

The racial and ethnic composition of neighborhoods with concentrations of poverty is disproportionate relative to the U.S. population overall. According to the U.S. Department of Health and Human Services, Black and Hispanic populations comprise nearly 80% of the population living in areas of concentrated poverty in metropolitan areas, but only account for 42.6% of the total poverty population in the U.S.⁵ Overrepresentation of these groups in areas of concentrated poverty can exacerbate disparities related to safety, employment, access to jobs and quality education, and conditions that lead to poor health.

Identification of RECAPs is significant in determining priority areas for reinvestment and services to ameliorate conditions that negatively impact RECAP residents and the larger region. Since 2000, the prevalence of concentrated poverty in America has expanded by nearly 75% in both population and number of neighborhoods. The majority of concentration of poverty is within the largest metro areas, but suburban regions have experienced the fastest growth rate.⁶

There is currently one (1) census tract that is designated as a RECAP in the Waterloo/Cedar Falls HOME Consortium. The RECAP census tract is located in Downtown Waterloo. The share of residents living below the poverty line in this tract (40.8%) is one of the highest in Waterloo/Cedar Falls Consortium and exceeds the 40% threshold for the tract to be designated as a RECAP tract.

Approximately 1,517 residents reside in the RECAP tract and account for 2.2% of Waterloo's total population. Black residents comprise 31.6% of this census tract. Hispanic residents are the second largest racial or ethnic minority group within the RECAP tract accounting for 13.6% of the tract's population. Residents who identify as some other race

⁵ United States, Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. "Overview of Community Characteristics in Areas with Concentrated Poverty." ASPE Issue Brief, May 2014, https://aspe.hhs.gov/system/files/pdf/40651/rb_concentratedpoverty.pdf.

⁶ Kneebone, Elizabeth. "The Growth and Spread of Concentrated Poverty, 2000 to 2008-2012." The Brookings Institution, 29 July 2016, www.brookings.edu/interactives/the-growth-and-spread-of-concentrated-poverty-2000-to-2008-2012/.

and Asian or Pacific Islander residents represent smaller segments of the tract's population comprising 4.4% and 2.1% of the population, respectively. The foreign-born population makes up a small fraction of the population in Waterloo's RECAP census tract, with residents originating from Mexico comprising the largest share of foreign-born residents, representing 4.5% of the tract's population. There are few residents from El Salvador and Bosnia and Herzegovina residing in the RECAP tract, comprising 0.5% and 0.2% of the population, respectively.

TABLE 3 – RECAP CENSUS TRACTS IN NORTH WATERLOO

Demographic Indicator	Waterloo/Cedar Falls HOME Consortium RECAP Tracts	
	#	%
Race/Ethnicity		
Total Population in RECAPs	1,517	-
White, Non-Hispanic	918	60.5%
Black or African American, Non-Hispanic	480	31.6%
Hispanic	206	13.6%
Asian or Pacific Islander, Non-Hispanic	32	2.1%
Native American, Non-Hispanic	0	0.0%
Other, Non-Hispanic	67	4.4%
National Origin		
Foreign-Born Population		
Mexico	69	4.5%
El Salvador	8	0.5%
Bosnia and Herzegovina	3	0.2%

Data Sources: 2018-2022 5-Year American Community Survey, Tables B03002, B17001, and B05006

Figures 1 and 2 on the following pages map poverty rates across the Waterloo/Cedar Falls Consortium overlaid with dots representing the race, ethnicity, and national origin of residents. In both figures, shading on the maps indicate poverty levels with darker shading representing census tracts with higher poverty rates. The highest levels of poverty in Waterloo occur in or near Downtown Waterloo. Figure 1 indicates distinct concentrations of Black residents in census tracts with higher rates of poverty, particularly north of Downtown where the historically Black neighborhood of Smokey Row is located. The residential concentrations of Hispanic residents are less clear; however, there are indications that Hispanic populations are clustered in areas of higher poverty, particularly in the eastern region of Waterloo. Figure 2 shows concentrated patterns of foreign-born residents from Bosnia, Burma, and Thailand in high poverty census tracts; however, these concentrations are not located in census tracts with the highest poverty rates.

FIGURE 1 – POVERTY RATES WITH RACE AND ETHNICITY IN THE WATERLOO/CEDAR FALLS HOME CONSORTIUM, 2018-2022

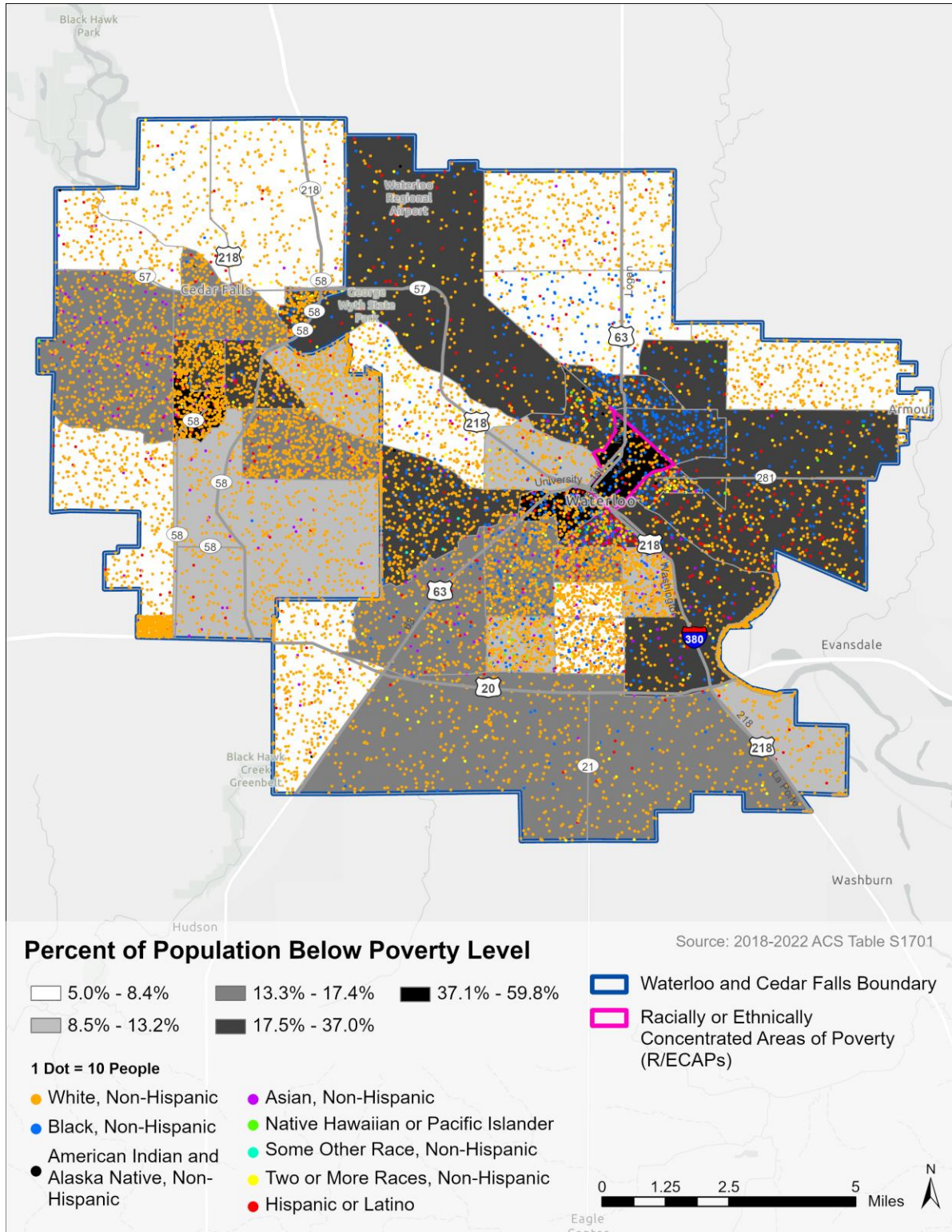
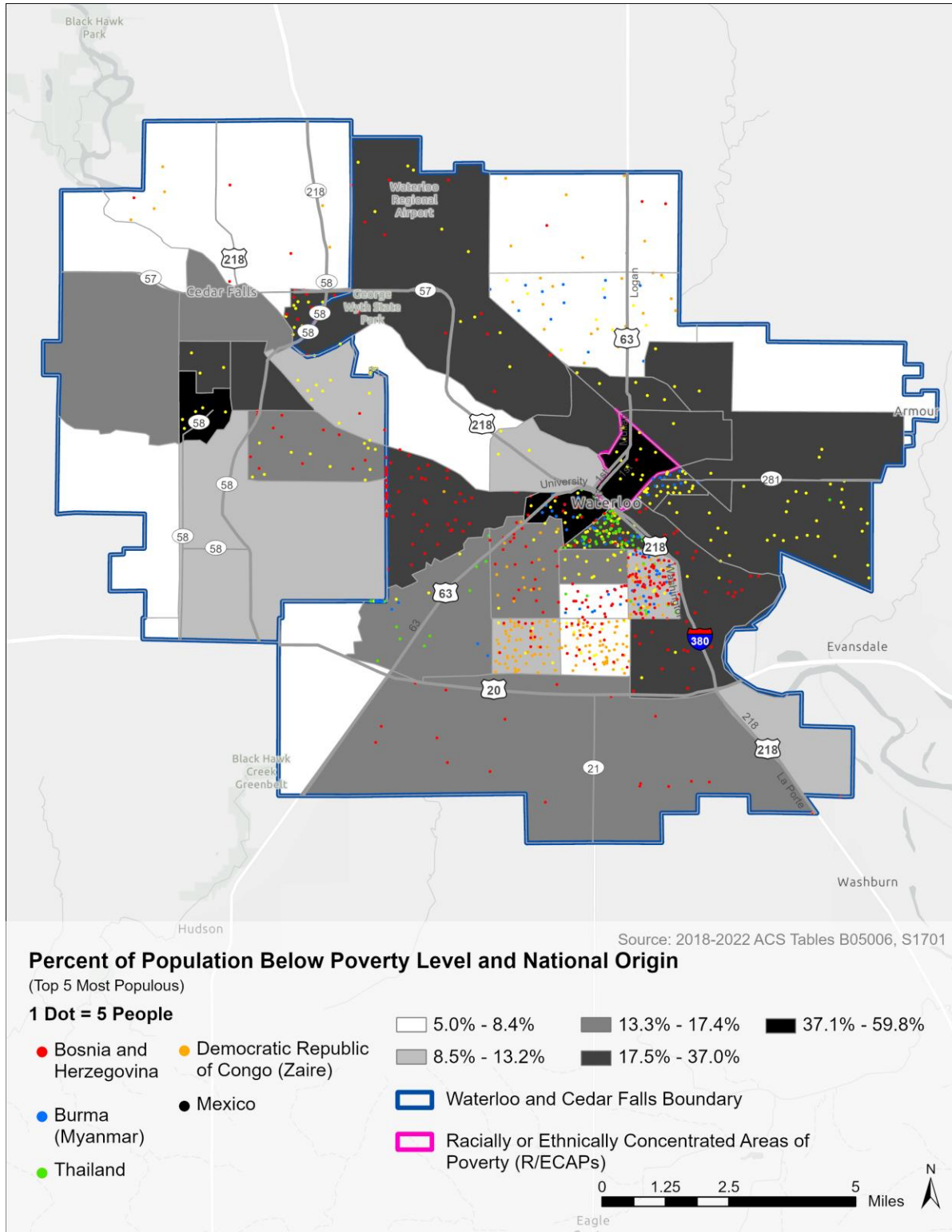


FIGURE 2 – POVERTY RATES AND NATIONAL ORIGIN IN THE WATERLOO/CEDAR FALLS HOME CONSORTIUM, 2018-2022



CHAPTER 4.

SEGREGATION AND

INTEGRATION

Communities experience varying levels of segregation between different racial, ethnic, and socioeconomic groups. High levels of residential segregation often lead to conditions that exacerbate inequalities among population groups within a community. Increased concentrations of poverty and unequal access to jobs, education, and other services are some of the consequences of high residential segregation.⁷

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968 not only encouraged segregation, but mandated restrictions based on race in specific neighborhoods. The Fair Housing Act of 1968 outlawed discriminatory housing practices, but did little to address the existing segregation and inequalities. Other federal housing policies and programs, like Section 8, have been implemented in an effort to ameliorate the negative effects of residential segregation and reduce concentrations of poverty. Despite these efforts, the repercussions of the discriminatory policies and practices continue to have a significant impact on residential patterns today.

RACE AND ETHNICITY

To illustrate demographic trends over time, Figures 3 through 5 map the Waterloo/Cedar Falls HOME Consortium's population by race and ethnicity using data from the 2000 Census and the 5-Year American Community Survey datasets from 2006-2010 and 2018-2022. The most densely populated areas in Waterloo are south of the Cedar River and Downtown Waterloo. Similarly, the most densely populated neighborhoods in Cedar Falls are located south of the downtown district with a smaller area that is more densely populated than neighborhoods in Waterloo.

Areas with high populations in Waterloo are more racially and ethnically diverse compared to Cedar Falls; however, clear patterns of concentration and segregation exist in Waterloo. Historical data indicates increasing racial and ethnic diversification of Waterloo's population, but also among populations residing in Cedar Falls although at a slower rate. There are strong patterns shown in Figures 3 through 5 that suggest high levels

⁷ Massey, D. (1990). *American Apartheid: Segregation and the Making of the Underclass*. *American Journal of Sociology*, 96(2), 329-357. Retrieved from <http://www.jstor.org/stable/2781105>

of segregation between white and Black populations in Waterloo since 2000. Population distribution patterns by race and ethnicity show a strong concentration of Black residents located in neighborhoods north of the Cedar River and Downtown Waterloo. Geographic distribution of white residents has remained mostly unchanged since 2000; however, residential patterns of Black residents have become more concentrated in neighborhoods immediately north of Downtown Waterloo.

FIGURE 3 – POPULATION BY RACE AND ETHNICITY IN WATERLOO/CEDAR FALLS HOME CONSORTIUM, 2018-2022

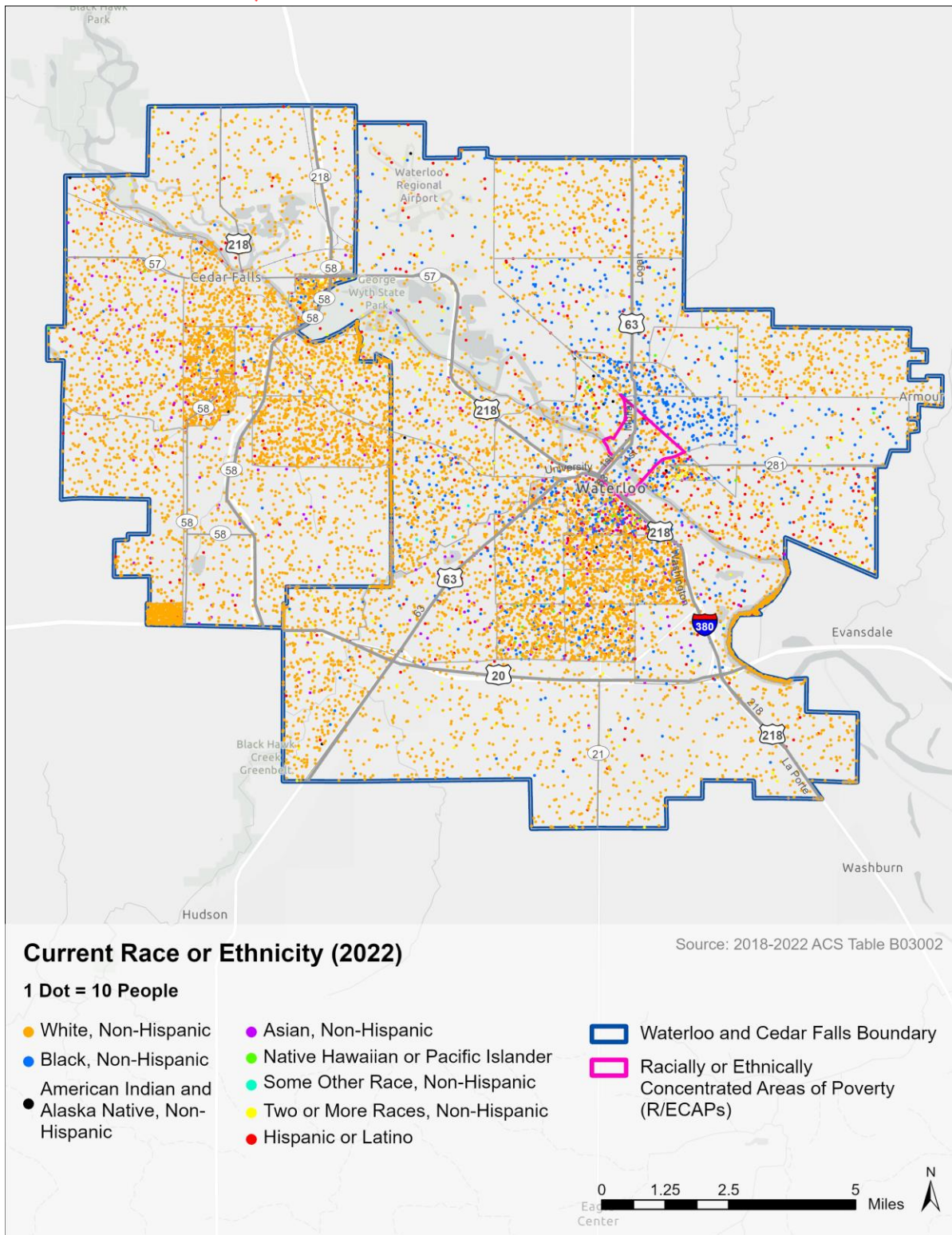


FIGURE 4 – POPULATION BY RACE AND ETHNICITY IN WATERLOO/CEDAR FALLS HOME CONSORTIUM, 2006-2010

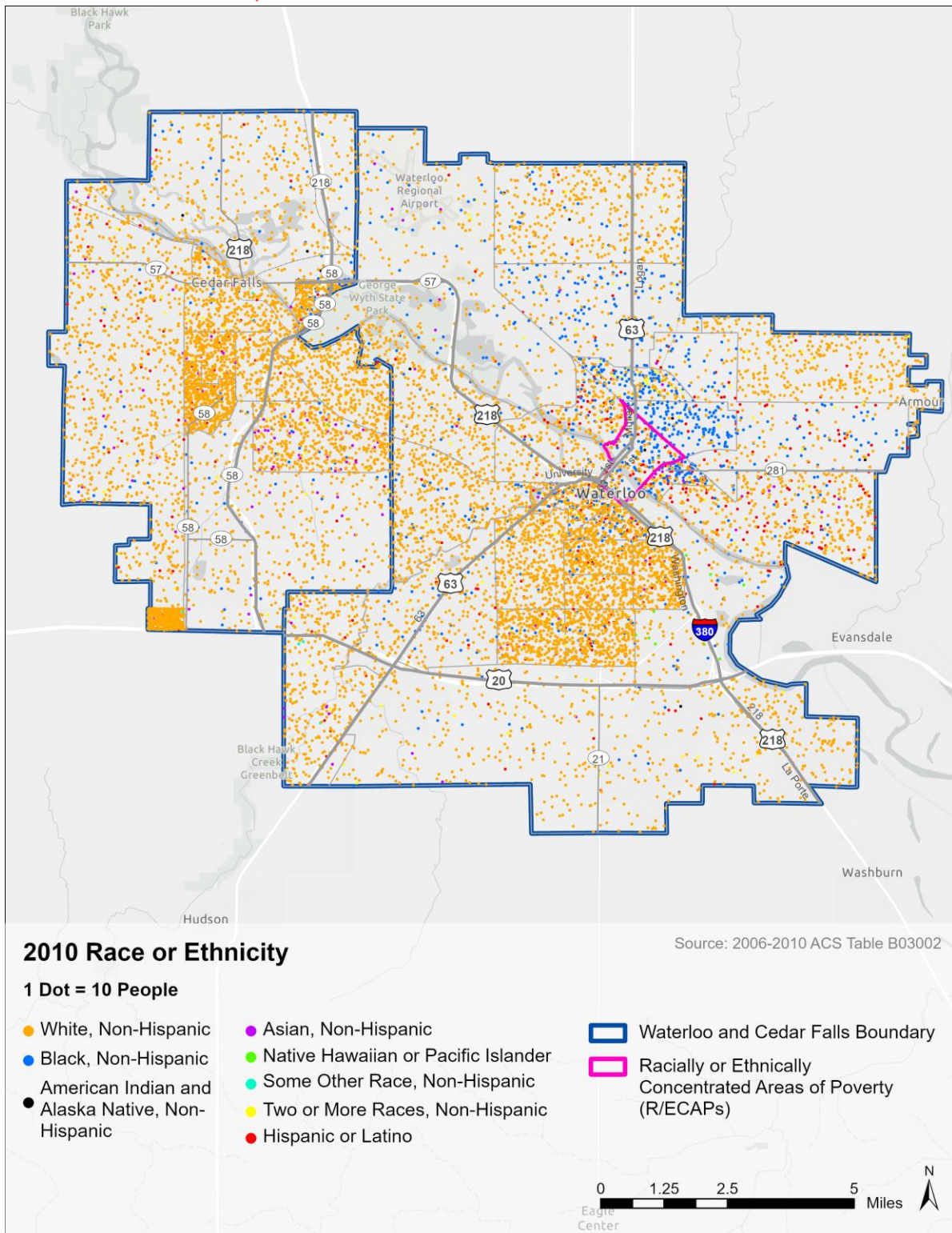
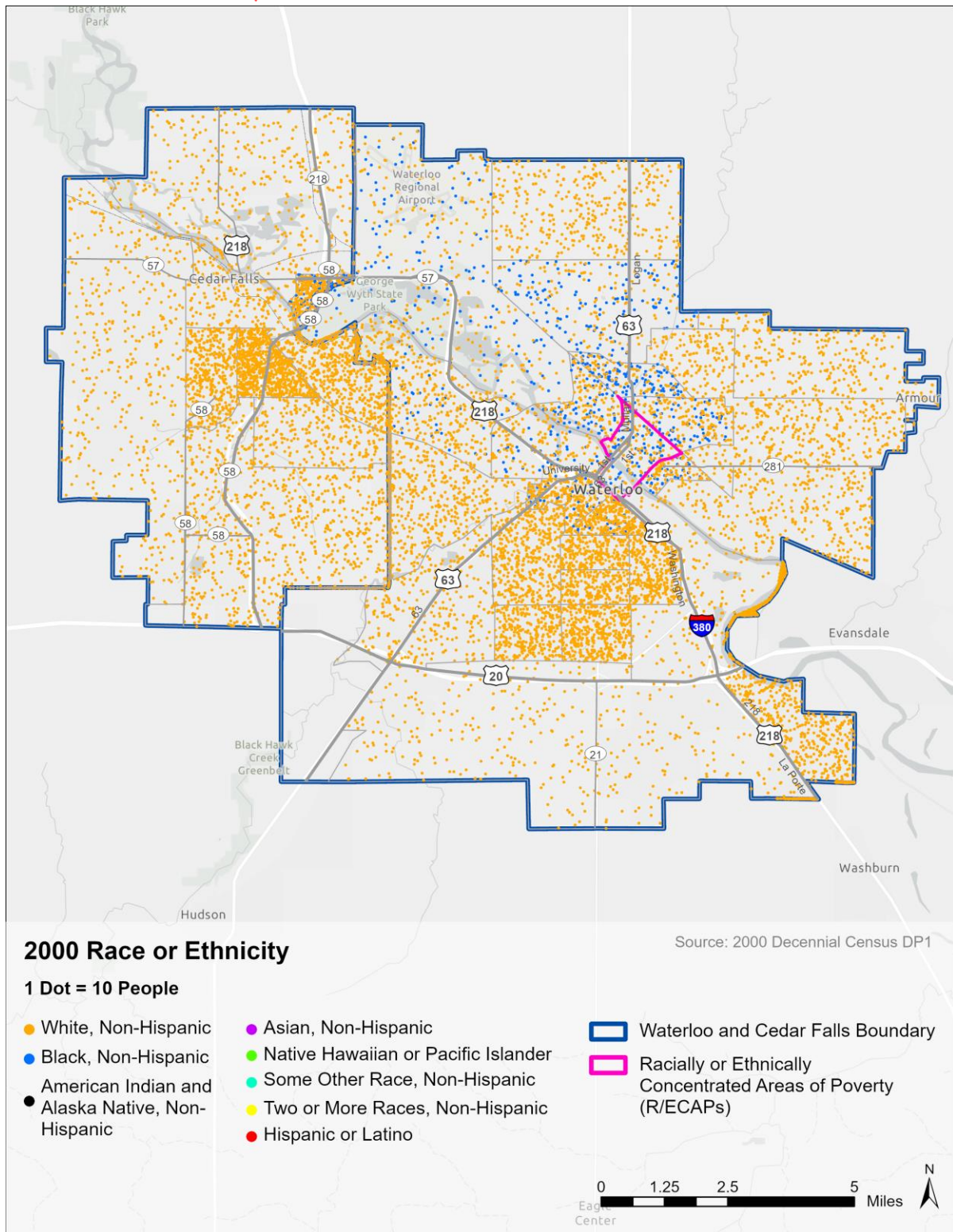


FIGURE 5 – POPULATION BY RACE AND ETHNICITY IN WATERLOO/CEDAR FALLS HOME CONSORTIUM, 2000



SEGREGATION LEVELS

In addition to visualizing the racial and ethnic composition of the area with the preceding maps, this study also uses a statistical analysis – referred to as dissimilarity – to evaluate how residential patterns vary by race and ethnicity, and how these patterns have changed since 1990. The Dissimilarity Index (DI) indicates the degree to which two groups living in a region are similarly geographically distributed. Segregation is lowest when the geographic patterns of each group are the same. For example, segregation between two groups in a city or county is minimized when the population distribution by census tract of the first group matches that of the second. Segregation is highest when no members of the two groups occupy a common census tract. The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups.

Evenness is not measured in an absolute sense, but is scaled relative to the other group. Dissimilarity Index values range from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation. The DI represents the proportion of one group that would have to change its area of residence to match the distribution of the other.

The table below shares the dissimilarity indices for three pairings in the Waterloo/Cedar Falls Consortium as a whole, and in the larger Waterloo/Cedar Falls region as designated by HUD. This table presents values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement. The “block group” figure is calculated using block groups as the area of measurement. Because block groups are smaller geographies, they measure segregation at a finer grain than analyses that use census tracts and, as a result, often indicate slightly higher levels of segregation than tract-level calculations.⁸ This assessment begins with a discussion of segregation at the tract-level from 1990 through 2010, and then examines the 2010 figure calculated using block groups.

The dissimilarity indices calculated for each pairing in Waterloo show high levels of segregation between Black and white populations throughout the period between 1990 and 2010. DI values decreased from 69.3 in 1990 to 56.9 in 2010 indicating declining segregation; however, DI values at the tract and block group level for 2010 exceed the threshold for high segregation levels. The Hispanic/white pairing indicates growing segregation among Hispanic and white residents in the Consortium. The DI value for the Hispanic/white pairing doubled in 2000 and exceeded the designated threshold

⁸ Iceland, John and Erika Steinmetz. 2003. *The Effects of Using Block Groups Instead of Census Tracts When Examining Residential Housing Patterns*. U.S. Census Bureau, Washington DC: US. Accessed via https://www.census.gov/hhes/www/housing/resseg/pdf/unit_of_analysis.pdf.

This study of the effect of using census block groups instead of tracts to examine housing pattern in 331 metropolitan areas throughout the U.S. indicated that index scores were modestly higher when using block groups, by an average of 3.3 points for all metro area dissimilarity scores.

indicating moderate segregation. The increase in DI value between 2000 and 2010 is less drastic; however, DI values continue to indicate moderate segregation in 2010 at the tract and block group level. DI values for the Asian or Pacific Islander/white pairing are the only that remain consistently within the range indicating low levels of segregation among Asian or Pacific Islander and white populations in the Consortium

DI values calculated for the greater Waterloo/Cedar Falls Region show only moderate levels of segregation among Black and white populations; however, segregation levels among Hispanic/white and Asian or Pacific Islander/white pairings are significantly higher to pairings within the Consortium. DI values for the Hispanic/white pairing (60.2) at the regional level exceed the threshold indicating high levels of segregation. show significant difference between segregation levels. To a lesser extent, DI values for Asian or Pacific Islander/white pairings are significantly higher at the regional level and surpass the threshold to indicate moderate levels of segregation in the region.

TABLE 4 – RACIAL AND ETHNIC DISSIMILARITY TRENDS

Race/Ethnicity	Census Tracts			Block Groups 2010
	1990	2000	2010	
Waterloo/Cedar Falls Consortium				
Black/White	68.1	63.9	56.9	60.8
Hispanic/White	21.9	40.3	42.7	43.0
Asian or Pacific Islander/White	29.4	22.8	25.9	30.5
Waterloo/Cedar Falls Region				
Black/White	57.6	54.9	48.2	52.1
Hispanic/White	71.6	68.1	60.2	65.5
Asian or Pacific Islander/White	26.2	40.0	42.6	44.1

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, <https://egis.hud.gov/affht/>

NATIONAL ORIGIN AND LIMITED ENGLISH PROFICIENCY POPULATION

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-

born populations recently.⁹ Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.¹⁰

Populations with limited English proficiency (LEP) are typically composed of foreign-born residents that originate from countries where English is not the primary language, however, a substantial portion (19%) of the national LEP population is born in the United States. Nationally, the LEP population has lower levels of education and is more likely to live in poverty compared to the English proficient population.¹¹ Recent studies have also found that areas with high concentrations of LEP residents have lower rates of homeownership.¹²

Communities of people sharing the same ethnicity and informal networks are able to provide some resources and opportunities, but numerous barriers and limited financial capital influence residential patterns of foreign-born and LEP populations.

Figure 6 shows distinct concentrations of foreign-born residents mostly residing in Waterloo. There are strong concentrations of residents originating from Bosnia and Herzegovina, Burma, Thailand, and the Democratic Republic of Congo. The densest concentration of residents from Bosnia and Herzegovina is located in a residential neighborhood southeast of downtown between East Ridgeway Avenue and Hammond Avenue where Burmese residents are also concentrated. Less dense concentrations of populations from Bosnia and Herzegovina are found in the western parts of Waterloo and nearby in southeast Cedar Falls. The majority of Waterloo's Thai population is located south of West 5th Street and north of Williston Avenue. Congolese residents reside in a residential area in south Waterloo bound by Ridgeway Avenue, Hammond Avenue, San Marnan Drive, and Ansborough Avenue. Although more spatially widespread, the population of residents from Mexico live mostly in neighborhoods near Downtown Waterloo and north of the Cedar River along Independence Avenue.

⁹ James, F., Romine, J., & Zwanzig, P. (1998). *The Effects of Immigration on Urban Communities*. *Cityscape*, 3(3), 171-192.

¹⁰ Massey, D. (1999). *Why Does Immigration Occur?: A Theoretical Synthesis*. In Hirschman C., Kasinitz P., & DeWind J. (Eds.), *Handbook of International Migration, The: The American Experience* (pp. 34-52). Russell Sage Foundation.

¹¹ Zong, J. & Batalova, J. (2015). "The Limited English Proficient Population in the United States" *Migration Information Source*. Retrieved: <http://www.migrationpolicy.org/article/limited-english-proficient-population-united-states>

¹² Golding, E., Goodman, L., & Stochack, S. (2018). "Is Limited English Proficiency a Barrier to Homeownership." *Urban Institute*. Retrieved: <https://www.urban.org/research/publication/limited-english-proficiency-barrier-homeownership>

The residential patterns displayed in Figure 7 illustrate that the geographic distribution of residents with limited English proficiency (LEP) closely mirrors the locations of the foreign-born population in Waterloo and Cedar Falls. The lack of an LEP population in Waterloo that coincides with the concentrations of foreign-born residents from Bosnia and Herzegovina, and to a lesser extent the Democratic Republic of Congo, is an indication of the population's proficiency with the English language. Notably, the LEP population in Cedar Falls seems significantly smaller compared to the foreign-born population of Cedar Falls.

FIGURE 6 – NATIONAL ORIGIN

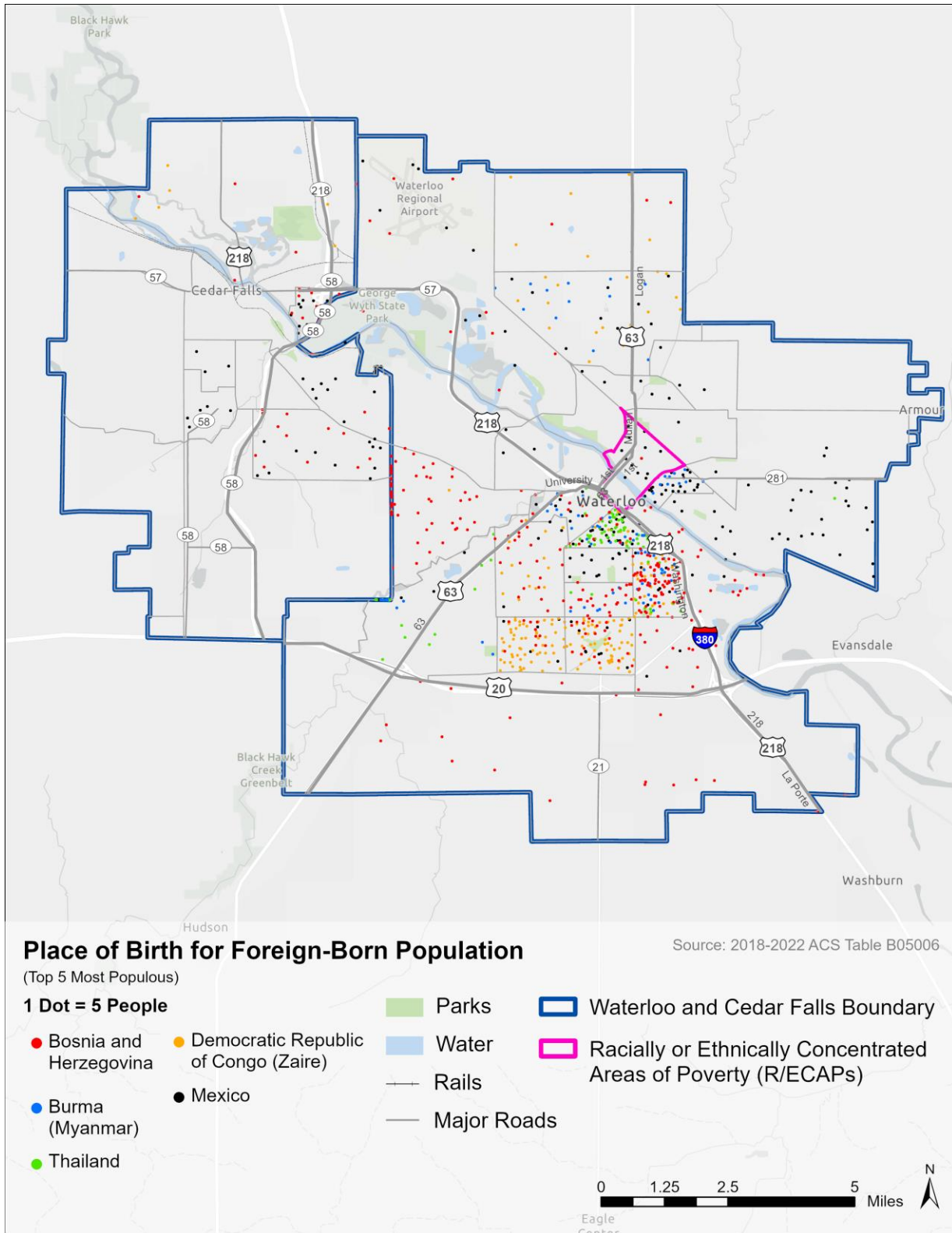
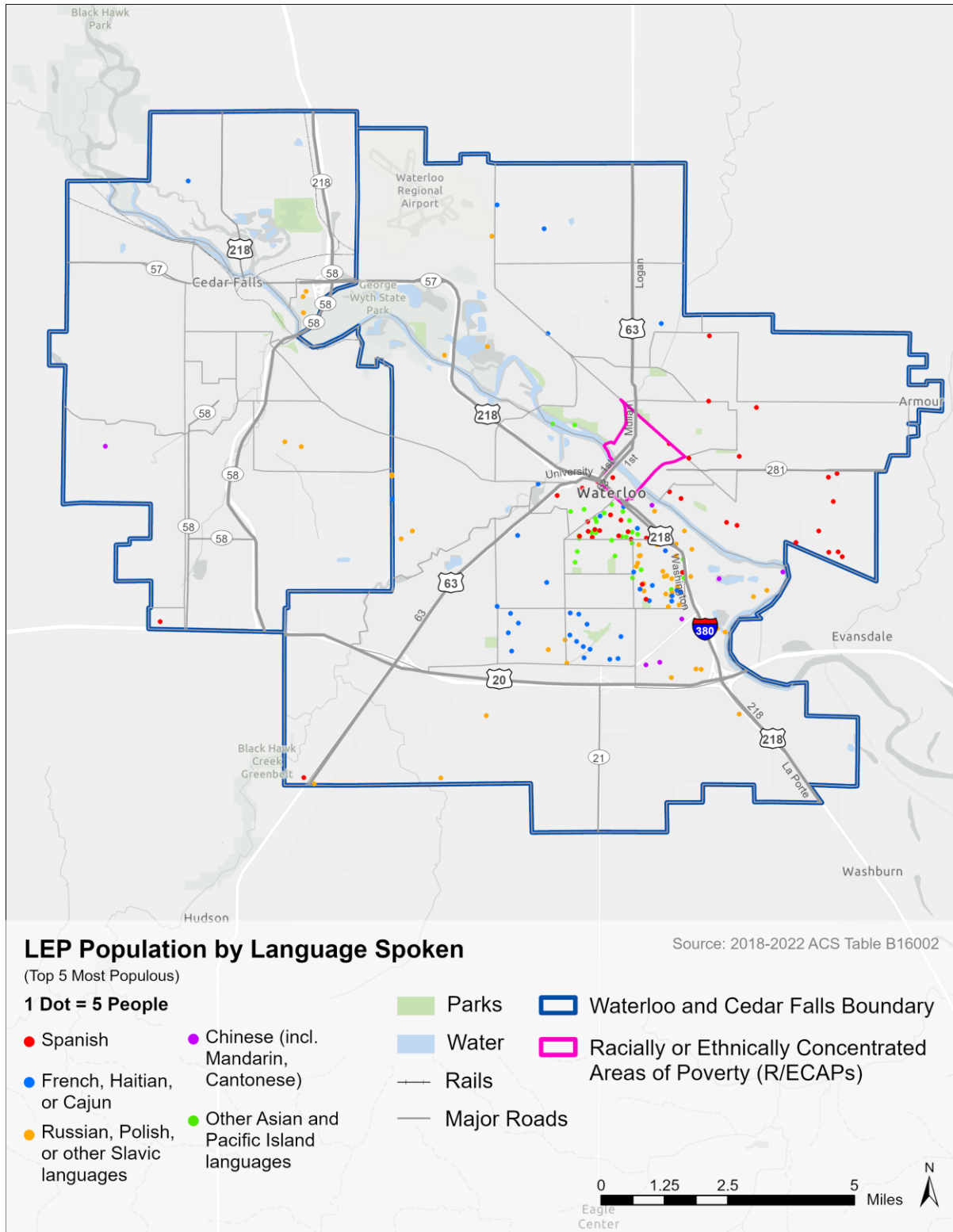


FIGURE 7 – POPULATION WITH LIMITED ENGLISH PROFICIENCY



CHAPTER 5.

ACCESS TO

OPPORTUNITY

Where people live shapes prospects for economic mobility, as well as access to quality education, affordable transportation, a healthy environment, and fresh, affordable food. For protected classes, such as people of color or with disabilities, neighborhood or housing choices are often limited by factors such as discrimination in housing markets or public policies that result in concentrated poverty, disinvestment, and a lack of affordable housing in neighborhoods with access to proficient schools and jobs that pay a living wage. In this way, limited housing choice reduces access to opportunity for many protected classes.

It is important to understand opportunity, as used in this context, as a subjective quality. Typically, it refers to access to resources like employment, quality education, healthcare, childcare, and other services that allow individuals and communities to achieve a high quality of life. However, research on this subject has found perceptions of opportunity follow similar themes but are prioritized differently by different groups. Racial and ethnic minorities, low-income groups, and residents of distressed neighborhoods identified job access, employment, and training as important opportunities while white residents, higher income groups, and residents of wealthier neighborhoods more often identified sense of community, social connections among neighbors, freedom of choice, education, and retirement savings.¹³

Proximity is often used to indicate levels of access to opportunity; however, it would be remiss to consider proximity as the only factor in determining level of access. Access to opportunity is also influenced by social, economic, and cultural factors, thus making it difficult to accurately identify and measure. HUD conducted research regarding Moving to Opportunity for Fair Housing (MTO) to understand the impact of increased access to opportunity. Researchers found residents who moved to lower-poverty neighborhoods experienced safer neighborhoods and better health outcomes, but there was no significant change in educational outcomes, employment, or income.¹⁴ However, recent

¹³ Lung-Amam, Willow S., et al. "Opportunity for Whom? The Diverse Definitions of Neighborhood Opportunity in Baltimore." *City and Community*, vol. 17, no. 3, 27 Sept. 2018, pp. 636-657, doi:10.1111/cico.12318.

¹⁴ *Moving to Opportunity for Fair Housing Demonstration Program: Final Impacts Evaluation*. U.S. Department of Housing and Urban Development, Office of Policy Development and Research, www.huduser.gov/portal//publications/pdf/MTOFHD_fullreport_v2.pdf.

studies show the long-term effects of MTO on the educational attainment of children who were under the age of 13 are overwhelmingly positive, including improved college attendance rates and higher incomes. On the other hand, children who were over the age of 13 show negative long-term impacts from MTO.¹⁵

The strategy to improve access to opportunities through housing and community development programs has been two-pronged. Tenant-based housing vouchers allow recipients mobility to locate in lower-poverty areas, while programs such as the Community Development Block Grant and Choice Neighborhoods Initiative provide funds to increase opportunities in disadvantaged neighborhoods.

EMPLOYMENT AND WORKFORCE DEVELOPMENT

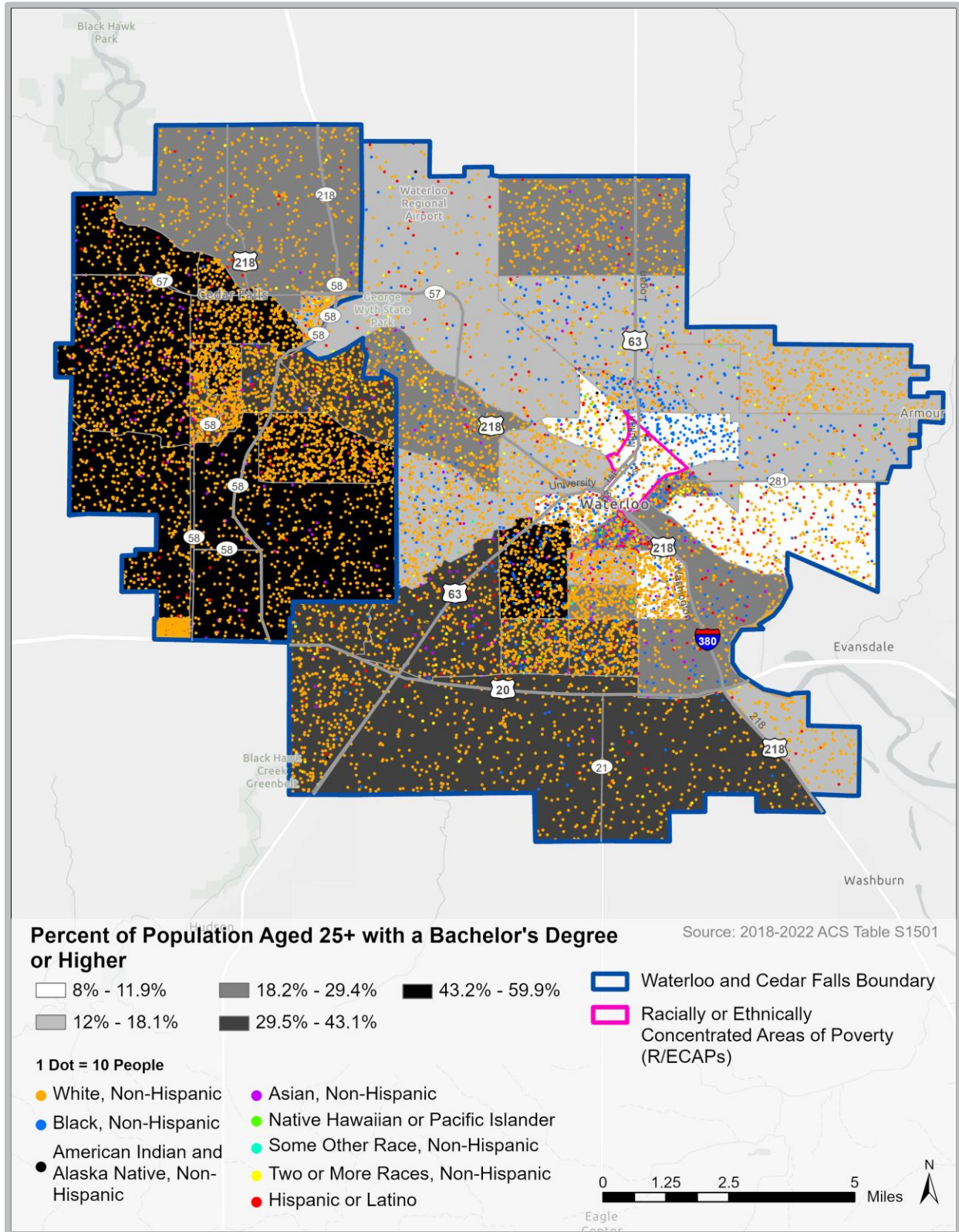
Neighborhoods with high numbers of jobs nearby are often assumed to have good access to those jobs. However, other factors—transportation options, the types of jobs available in the area, or the education and training necessary to obtain them—may also shape residents' access to available jobs. For example, residents of a neighborhood in close proximity to a high number of living-wage jobs may not have the skills or education required for those jobs, and thus may continue to experience high levels of unemployment, work in low-wage positions, or need to commute long distances to access employment. This section analyzes indicators of both labor market engagement and jobs proximity, which, when considered together, offer a better indication of how accessible jobs are for residents.

Labor Market Engagement

Educational attainment, labor force participation, and unemployment are indicators of residents' engagement with the labor market. In Waterloo and Cedar Falls, 22.9% and 49.1% of residents aged 25 and over have bachelor's degrees or higher, respectively. Residents in central and south Cedar Falls tend to have the highest levels of educational attainment, while educational attainment tends to be lowest in north Waterloo, (see Figure 8). Only one census tract in Waterloo has a population of over 43.2% to 59.9% where those aged 25 and older have a bachelor's degree or higher. The one RECAPs tract in Waterloo-Cedar Falls is located in Waterloo and has the lowest level of educational attainment with only 8% to 11.9% of residents holding a bachelor's degree or higher. The southern tracts in Waterloo have a higher share of residents with a bachelor's degree or higher ranging from 29.5% to 43.1%.

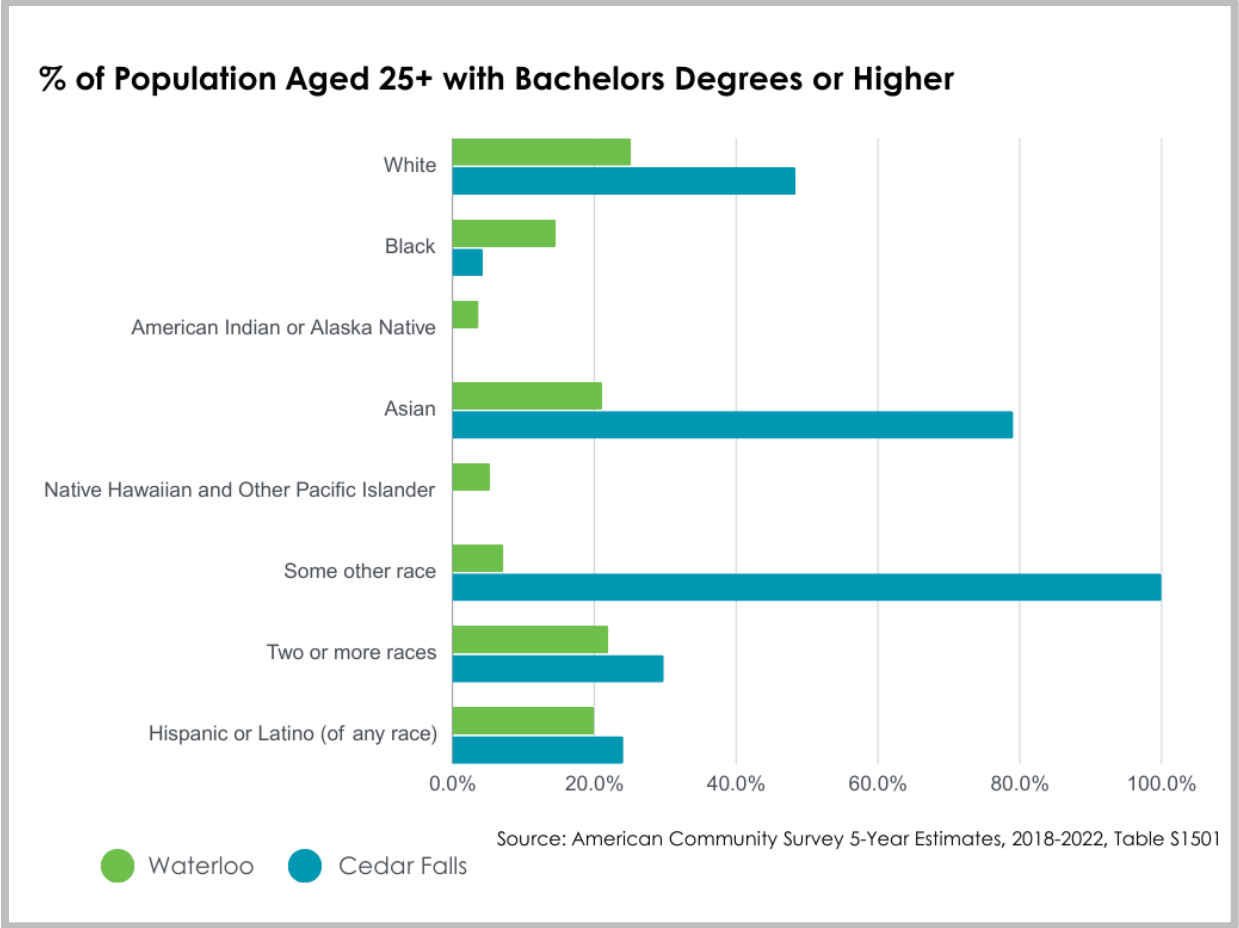
¹⁵ Chetty, Raj, Nathaniel Hendren, and Lawrence F. Katz. 2016. "The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment." *American Economic Review*, 106 (4): 855-902. https://scholar.harvard.edu/files/hendren/files/mto_paper.pdf

FIGURE 8 – EDUCATIONAL ATTAINMENT + RACE/ ETHNICITY



Data on educational attainment by race and ethnicity also show that education varies by race, ethnicity, and geography (see Figure 9). The share of residents with bachelor's degrees or higher is lowest among residents of Waterloo. American Indian/Alaska Native residents have the lowest educational attainment level with 3.7%, followed by Native Hawaiian and Other Pacific Islander (5.3%, see Figure 9). In Cedar Falls, 0% of American Indian/Alaska Native residents a bachelor's degree or higher. Black residents also the second least likely of all racial and ethnic groups in Cedar Falls to have a bachelor's degree or higher, (4.3%).

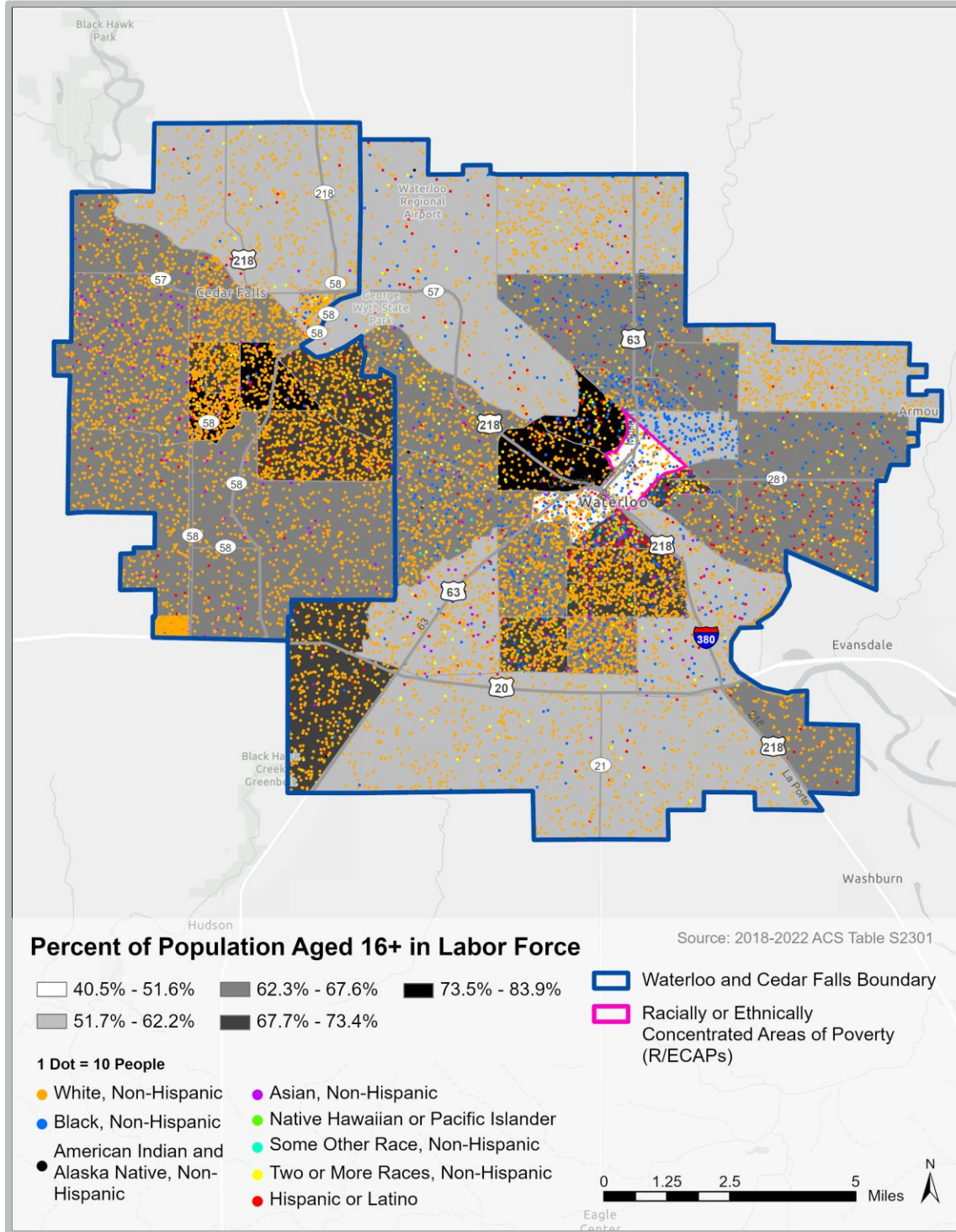
FIGURE 9 – EDUCATIONAL ATTAINMENT BY RACE/ ETHNICITY



An estimated 65.2% of the population in Waterloo, 69.6% of the population in Cedar Falls, and 66.5% of the population in Black Hawk County participates in the labor force (ACS 5-Year Estimates, 2018-2022, for population aged 16 and over). As with educational attainment, geographic disparities exist, with the labor force participation rate typically ranging from 40.5% to 51.6% in census tracts across the region. Residents in parts of central Waterloo and Cedar Falls tend to participate in the labor force at the highest levels. In Waterloo, participation tends to be lowest in the RECAPs tract where 40.5% to 51.6% of residents aged 16 and over participate in the labor force (see Figure 10). In Cedar Falls,

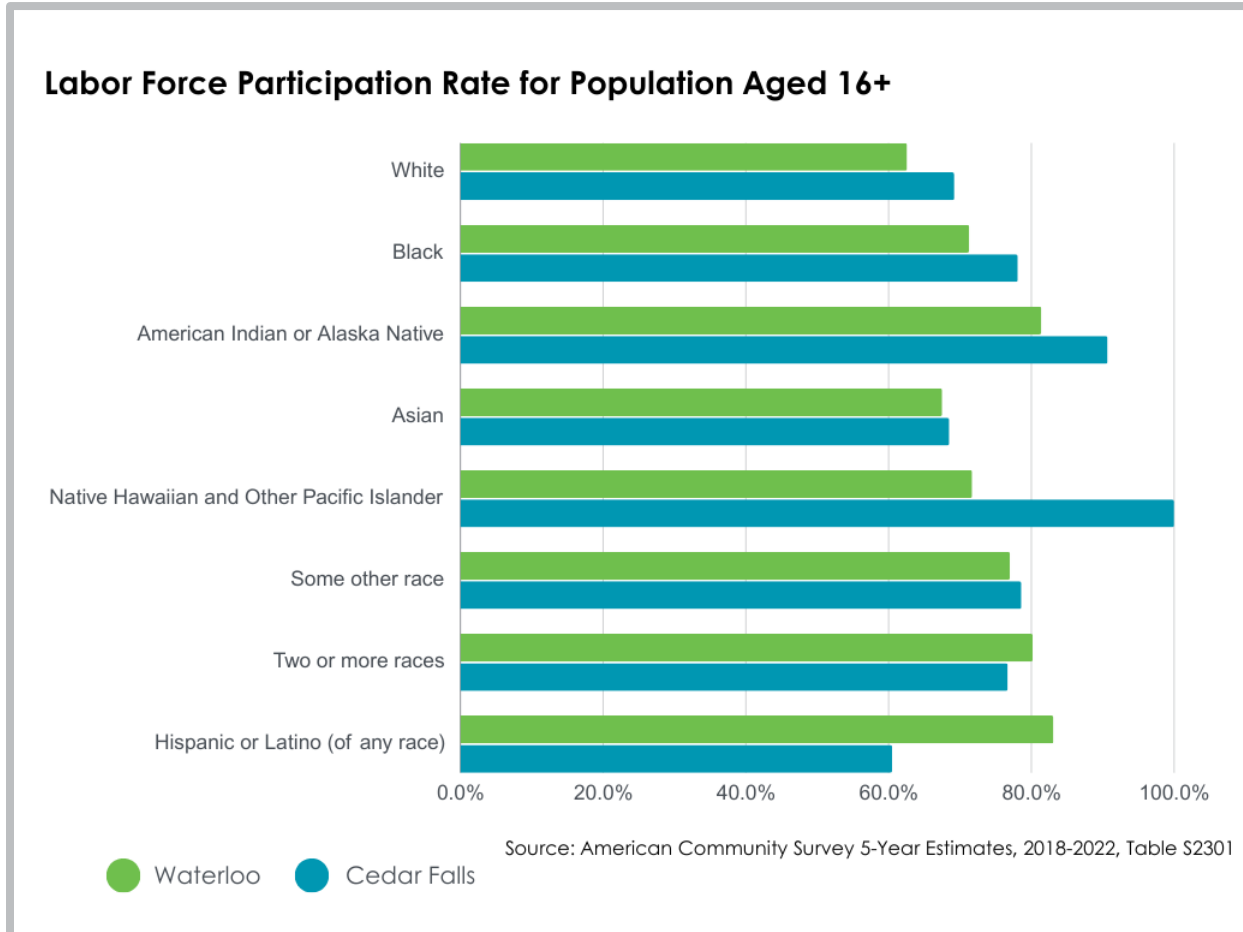
participation tends to be lower in the north portion of the city with rates ranging between 51.7% to 62.2%.

FIGURE 10 – LABOR FORCE PARTICIPATION + RACE/ ETHNICITY



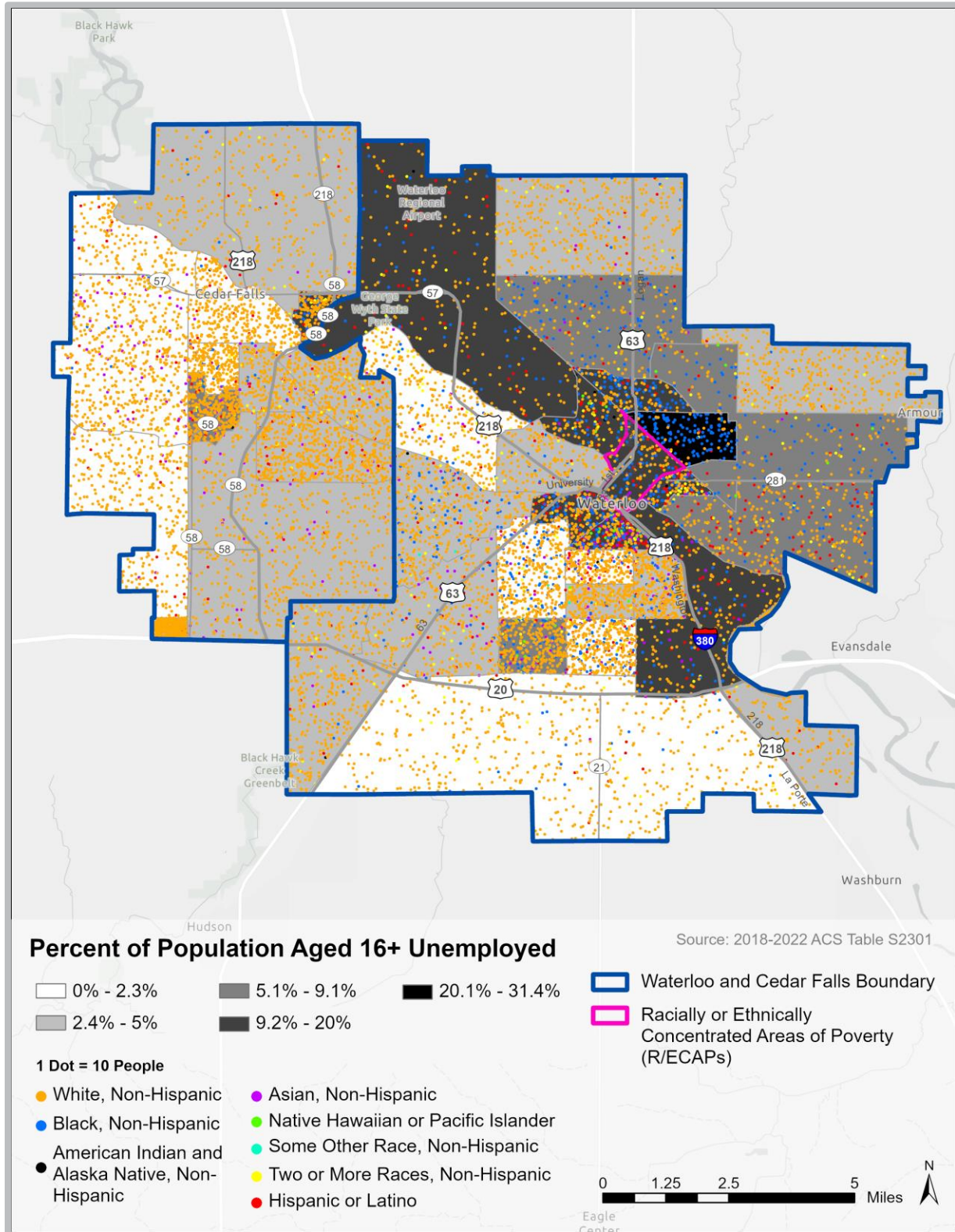
Some variation exists in labor force participation by race and ethnicity across the region. Labor force participation is highest among residents of Cedar Falls, except for those who identify as two or more races and Hispanic/Latino residents whom have higher participation rates in Waterloo. In Cedar Falls, Native Hawaiian/Other Pacific Islander residents have the highest participation rate (100.0%), while Hispanic/Latino residents have the lowest (60.5%). In Waterloo, Hispanic/Latino residents have the highest rate of people aged 16 and older participating in the labor force (83.1%), while white residents have the lowest rate (62.6%, See Figure 11).

FIGURE 11 – LABOR FORCE PARTICIPATION BY RACE/ ETHNICITY



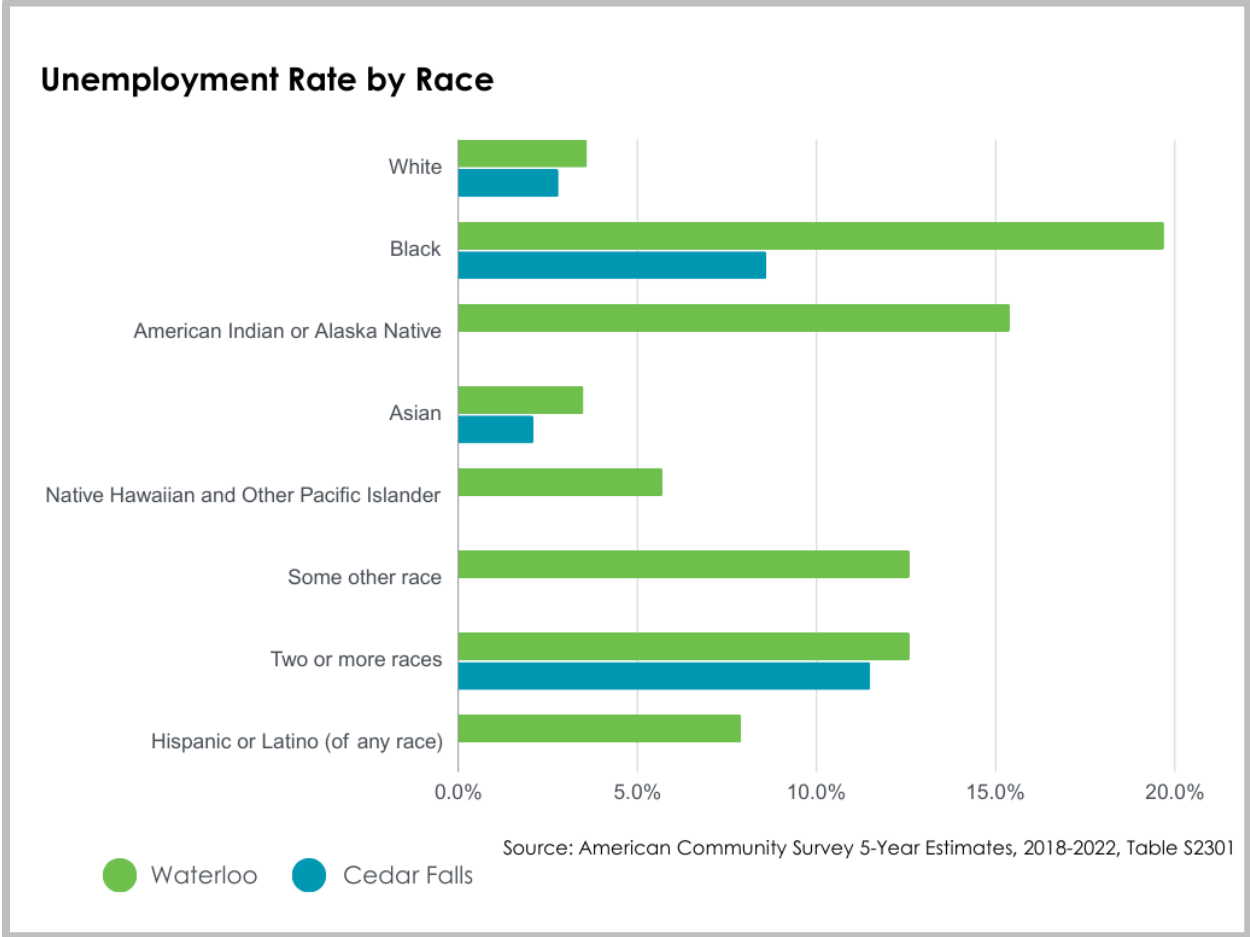
An estimated 7.1% of the population in Waterloo, 3.0% of the population in Cedar Falls, and 5.2% of the population in Black Hawk County was unemployed as of the American Community Survey five-year estimates for 2018-2022 (population aged 16 and over). As with educational attainment and labor force participation, unemployment varies across the region, ranging from less than 2.3% in many tracts in central and west Cedar Falls and west and south Waterloo, to more than 31.4% in several tracts in central and north Waterloo (see Figure 12). Unemployment rates in Waterloo census tracts are overall higher than in Cedar Falls.

FIGURE 12 – UNEMPLOYMENT RATE + RACE/ ETHNICITY



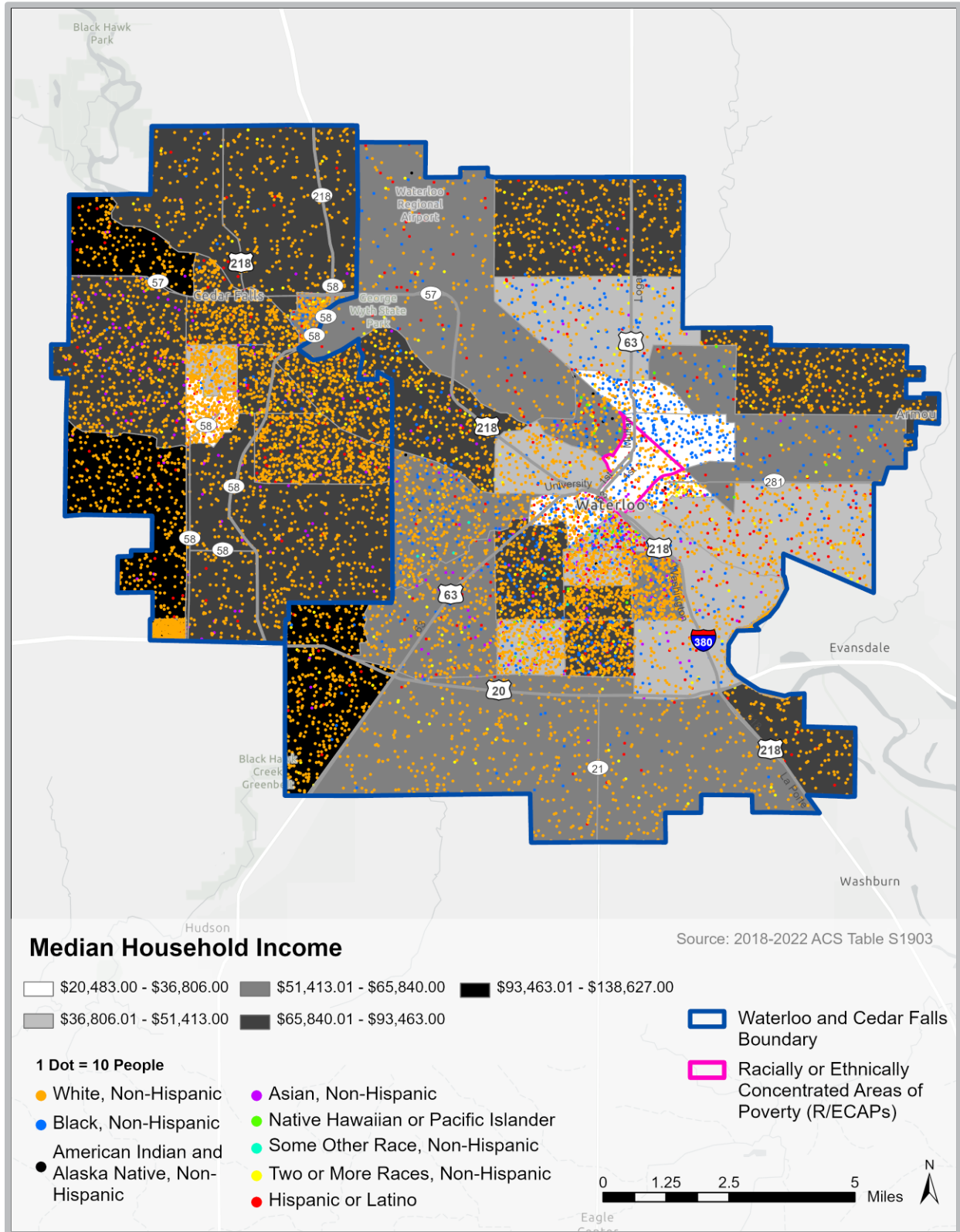
Variations in unemployment rates exist across racial and ethnic groups. In Waterloo, Black residents tend to experience the highest rate of unemployment (19.7%) while white and Asian residents have the lowest rates (3.6% and 3.5%, respectively). In Cedar Falls, those with two or more races have the highest unemployment rate of 11.5%.

FIGURE 13 – UNEMPLOYMENT BY RACE/ ETHNICITY



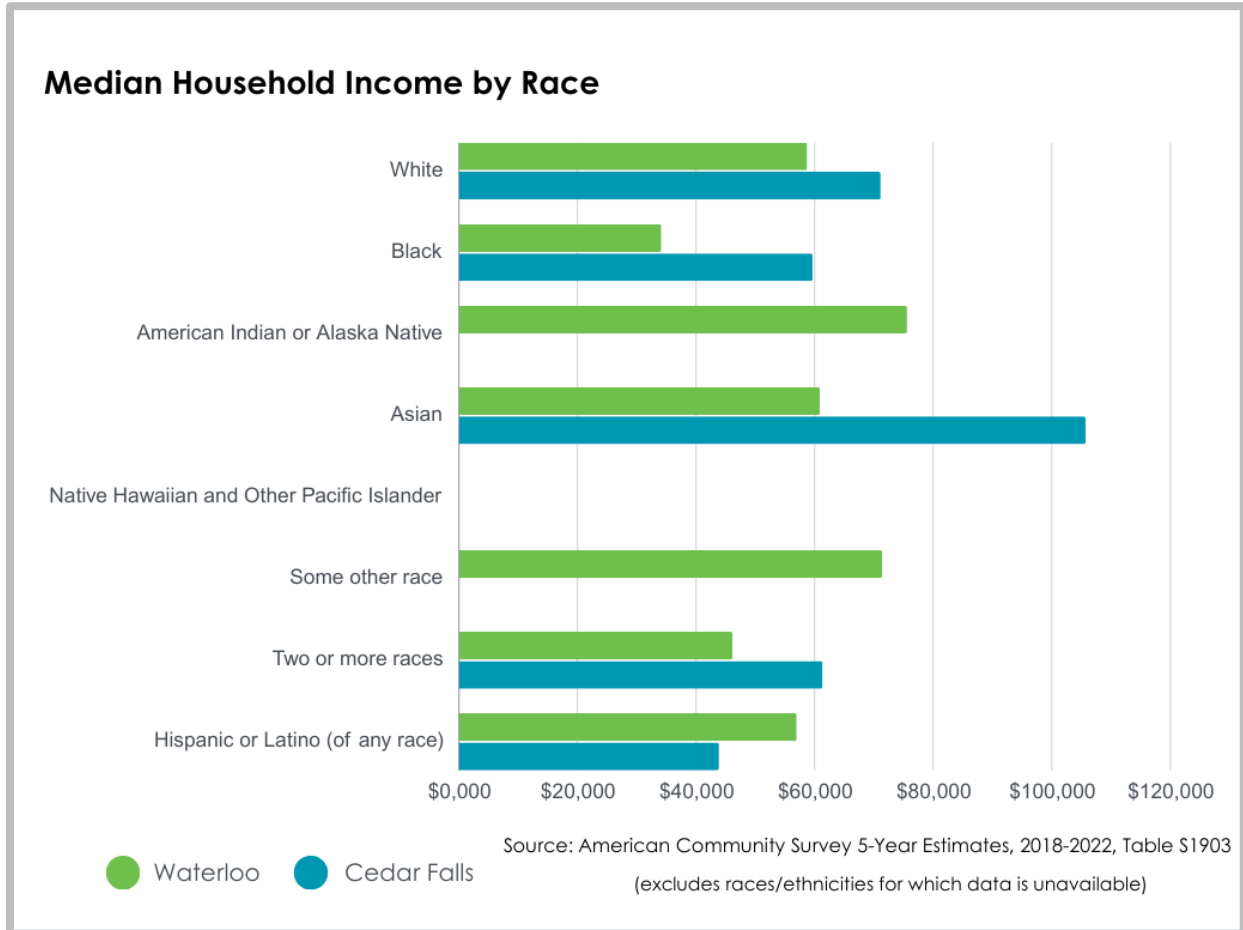
Household income is another indicator of access to employment and jobs that pay living wages. The American Community Survey estimates median household income at \$54,104 in Waterloo, \$71,011 in Cedar Falls, \$62,329 in Black Hawk County. Median household incomes in the region tend to be lowest in central Waterloo within and around the RECAPs tract where median incomes are as low as \$20,483 to \$36,806. Median incomes are highest in north-west and south-west Cedar Falls and south-west Waterloo where incomes are as high as \$93,463 .01 to \$138,627. Tracts with the highest median incomes tend to have high percentages of white residents and lower percentages of residents of other races (see Figure 14).

FIGURE 14 – MEDIAN HOUSEHOLD INCOME + RACE/ ETHNICITY



In Waterloo, household incomes tend to be highest among American Indian/Alaska Native residents (\$75,583) and lowest among Black residents (\$34,138). In Cedar Falls, Asian residents have the highest median income (\$105,714) while Hispanic/Latino residents have the lowest (\$43,864).

FIGURE 15 – MEDIAN HOUSEHOLD INCOME BY RACE/ ETHNICITY



Low median household incomes in some of the region's census tracts highlight the fact that many households may not have sufficient incomes to afford basic needs. Costs for a family of two working adults and one child in Waterloo-Cedar Falls, including housing, childcare, healthcare, food, transportation, taxes, and other miscellaneous costs, require an annual income of \$71,960 (after taxes).¹⁶

Yet, 17.1% of primary jobs held by Waterloo-Cedar Falls residents pay \$1,250 per month or less (\$15,000 or less per year). An estimated 28.0% of primary jobs held by Waterloo-Cedar Falls residents pay between \$1,251 and \$3,333 (between \$15,000 and \$39,996 per

¹⁶ MIT Living Wage Calculator. (2024). Retrieved from: <https://livingwage.mit.edu/>

year),¹⁷ indicating that a high proportion of residents may have difficulty affording basic living expenses.

Jobs Proximity

Mapping locations of jobs in the region shows that jobs tend to be clustered in parts of central and northern Waterloo. In Cedar Falls, jobs are clustered in the southern portion of Cedar Falls. There are fewer jobs in north Cedar Falls and in north-east Waterloo, (See Figure 16).

Residents and stakeholders who participated in this planning process noted that a lack of public transportation throughout Waterloo and Cedar Falls is often a barrier for residents in accessing employment. In particular, residents and stakeholders noted that employers in Waterloo-Cedar Falls often have difficulty attracting and maintaining employees because of the lack of affordable housing and public transportation in the county, which makes it difficult for lower-income residents to move to the area or commute in for work.

Longitudinal Employer-Household Dynamics data also indicates that a high proportion of workers living in each jurisdiction work outside of their city of residence. An estimated 46.6% of workers living in Waterloo and 64.6% of workers living in Cedar Falls work outside of the city in which they live.

Similarly, high proportions of jobs in each jurisdiction are held by workers who live outside the area. An estimated 64.9% of workers who hold jobs in Waterloo live outside of the city, and 74.3% of workers who hold jobs in Cedar Falls live outside the city.

This data further demonstrates that lack of access to vehicles and low levels of public transportation access may be barriers for a high proportion of residents in accessing employment, which for many residents includes commutes across city lines. Overall, labor market engagement and job proximity indicators, combined with data on cost of living in the region, indicate disparities in access to opportunity among protected classes.

¹⁷ Longitudinal Employer-Household Dynamics data. Home Area Profile Analysis. Retrieved from: <https://onthemap.ces.census.gov/>

FIGURE 16: JOBS PROXIMITY IN THE WATERLOO-CEDAR FALLS CONSORTIUM REGION

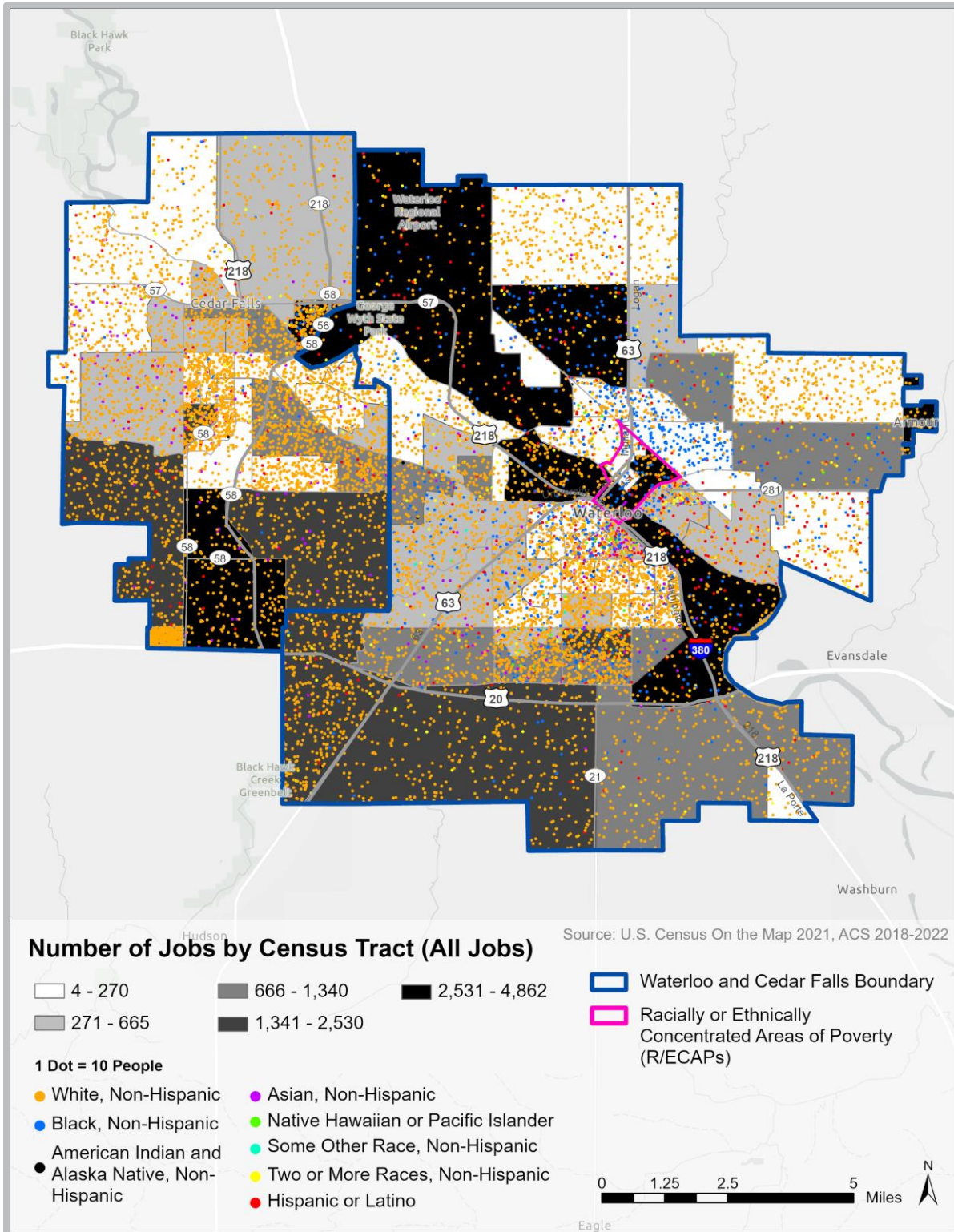


TABLE 5 – INFLOW AND OUTFLOW OF WORKERS (PRIMARY JOBS), 2021

Inflow and Outflow of Workers	Number	Percent
Living in Waterloo	28,465	100.0%
Living in the City but Employed Outside of the City	13,273	46.6%
Living and Employed in Waterloo	15,192	53.4%
Employed in Waterloo	43,223	100.0%
Employed in the City but Living Outside of the City	28,031	64.9%
Employed and Living in Waterloo	15,192	35.1%
Living in Cedar Falls	15,779	100.0%
Living in the City but Employed Outside of the City	10,199	64.6%
Living and Employed in Cedar Falls	5,580	35.4%
Employed in Cedar Falls	21,676	100.0%
Employed in the City but Living Outside of the City	16,096	74.3%
Employed and Living in Cedar Falls	5,580	25.7%

Source: Longitudinal Employer-Household Dynamics (LODES) data, 2021

EDUCATION

School proficiency is an indication of the quality of education that is available to residents of an area. High-quality education is a vital community resource that can lead to more opportunities, such as employment and increased earnings, and improve quality of life. The following section includes a demographic analysis of 19 elementary schools, 4 middle schools, 2 junior-high schools, and 3 high schools in the Waterloo Community School District and the Cedar Falls Community School District. As of 2023, there are 10,052 students enrolled in the Waterloo Community School District and 5,688 students enrolled in the Cedar Falls Community School District. In Waterloo's school district, majority of students are white (41.4%), followed by Black students (27.6%), and Hispanic/Latino students (13.9%). In Cedar Falls' school district, majority of students are white (83.0%), followed by Multi-Racial students (5.7%), and Black students (4.6%). The student population in Cedar Falls appears to be less diverse than Waterloo's with smaller shares of non-white racial/ethnic groups. In Waterloo' school district, around 17.2% of students have one or more disabilities (17.2%), slightly higher than Cedar Falls' rate of 13.4%. In Waterloo, more than three quarters of students come from a low socio-economic status (73.4%), nearly three times the rate of Cedar Falls' (27.2%).

School proficiency levels and demographics vary across the districts' schools:

- In Waterloo, all schools have scored lower than the state's average for various performance measures such as graduation rates, growth in mathematics, english proficiency, post-secondary readiness, and more. Schools in Cedar Falls all appear to either meet the state's average or surpass it in the various performance areas.
- The lowest scored school in Waterloo is Expo Alternative Learning Center (Elementary) with an overall rating of 24.26, nearly half of the state's average of 54.81. The school has a higher Black/African American student population (37.1%) compared to the district. Over 84.7% of the students come from a low-socioeconomic status household and nearly a quarter are students with disabilities (24.5%).
- The lowest scored school in Cedar Falls is Cedar Falls Virtual Campus which serves grades 01 through 12 with a score of 49.44. The student population is predominantly white (75.0%). More than half of students from a low socio-economic status household (52.3%).
- The highest performing school in Waterloo is Kingsley Elementary School with a score of 60.85. Majority of the students at this school are white (60.3%), followed by Multi-Racial students (15.2%), and Black/African American students (12.5%). Around 53.4% of students come from a low socio-economic status background and 15.7% have disabilities.
- The highest performing school in Cedar Falls is Peet Junior High School with a score of 62.38. The majority of students are white (82.4%), followed by

Black/African American students and Multi-Racial students with a share of 5.4% for each. Less than half of students come from a low socio-economic status background (26.6%) while 14.5% of students have disabilities.

Overall, the student population in Waterloo is more diverse than Cedar Falls while also having a larger share of students who come from low socio-economic households. Schools in Cedar Falls are all outperforming Waterloo's schools in every performance measure, meanwhile Waterloo's schools are falling far behind the state averages. This indicates that schools in Waterloo are in need of further investment and support particularly among minority and low-income student populations. This may further impact fair housing choice for families with school aged children who wish to enroll their children in quality schools but are limited in options in Waterloo. These performance and achievement gaps may act as a barrier in overall learning development for students in Waterloo compared to those attending schools in the Cedar Falls' district.

**TABLE 6.
SCHOOL PERFORMANCE AND DEMOGRAPHIC BY SCHOOL IN WATERLOO-CEDAR
FALLS**

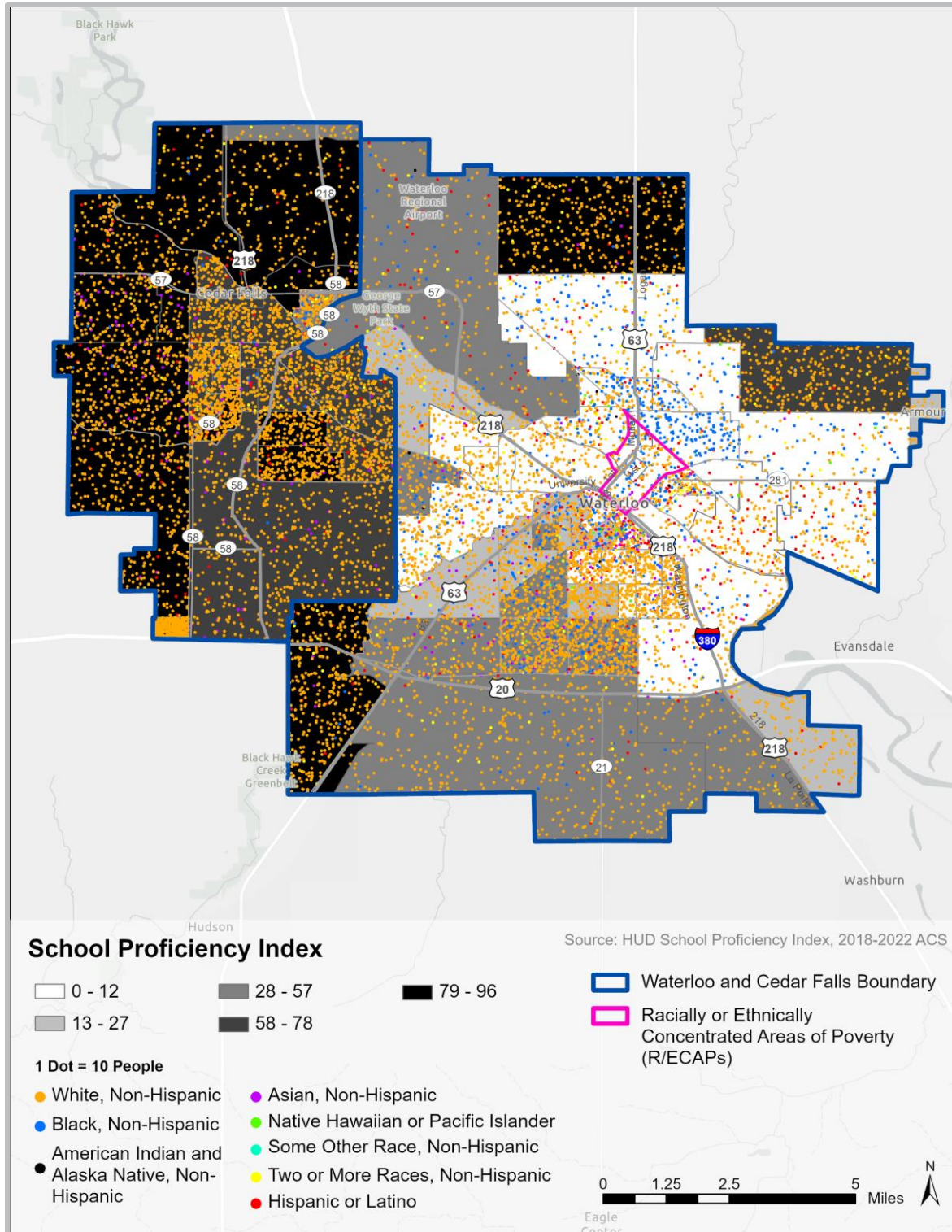
Waterloo Community School District					
Name	Grades Served	Comprehensive Status	Targeted Status	ESSA Support Year	Overall Score/Rating
Bunger Middle School	Middle 06, 07, 08	Met	Met	Extended Targeted Year 2	52.84 Acceptable
Central Middle School	Middle 06, 07, 08	Met	Targeted	Extended Targeted Year 2	47.19 Needs Improvement
Cunningham School	Elementary KG, 01, 02, 03, 04, 05	Met	Met	No Support Required	51.49 Acceptable
East High School	High 09, 10, 11, 12	Not-Met	Targeted	Targeted Year 2	36.52 Priority
Expo Alternative Learning Center	Alternative 06, 07, 08, 09, 10, 11, 12	Not-Met	Not-Met	Extended Comprehensive Year 2	24.26 Priority
Fred Becker Elementary School	Elementary KG, 01, 02, 03, 04, 05	Met	Targeted	Targeted Year 2	47.31 Needs Improvement
George Washington Carver Academy	Middle 06, 07, 08	Met	Targeted	Targeted Year 2	45.43 Needs Improvement
Highland Elementary School	Elementary KG, 01, 02, 03, 04, 05	Met	Met	Extended Targeted Year 2	56.09 Commendable
Hoover Middle School	Middle 06, 07, 08	Met	Targeted	Targeted Year 2	50.67 Acceptable
Irving Elementary School	Elementary KG, 01, 02, 03, 04, 05	Met	Met	Targeted Year 2	55.37 Commendable
Kingsley Elementary School	Elementary KG, 01, 02, 03, 04, 05	Met	Met	Extended Targeted Year 2	60.85 High Performing
Kittrell Elementary School	Elementary KG, 01, 02, 03, 04, 05	Met	Met	No Support Required	53.52 Acceptable
Lincoln Elementary School	Elementary KG, 01, 02, 03, 04, 05	Met	Targeted	Extended Targeted Year 2	47.89 Needs Improvement
Lou Henry Elementary School	Elementary KG, 01, 02, 03, 04, 05	Met	Met	Targeted Year 2	53 Acceptable
Lowell Elementary School	Elementary KG, 01, 02, 03, 04, 05	Not-Met	Targeted	Extended Targeted Year 2	44.15 Priority
Orange Elementary School	Elementary KG, 01, 02, 03, 04, 05	Met	Targeted	Targeted Year 1	56.58 Commendable
Poyner Elementary	Elementary KG, 01, 02, 03, 04, 05	Met	Targeted	Extended Targeted Year 2	47.05 Needs Improvement
West High School	High 09, 10, 11, 12	Not-Met	Targeted	Extended Targeted Year 2	42.03 Priority

Cedar Falls Community School District					
Name	Grades Served	Comprehensive Status	Targeted Status	ESSA Support Year	Overall Score/Rating
Bess Streefer Aldrich Elementary	Elementary KG, 01, 02, 03, 04, 05, 06	Met	Met	No Support Required	60.47 Commendable
Cedar Falls High School	High 10, 11, 12	Met	Met	Extended Targeted Year 2	55.14 Commendable
Cedar Falls Virtual Campus	Other 01, 02, 03, 04, 05, 06, 07, 08, 09, 10, 11, 12	Met	Met	Targeted Year 2	49.44 Acceptable
Cedar Heights Elementary School	Elementary KG, 01, 02, 03, 04, 05, 06	Met	Met	No Support Required	60 Commendable
Helen A Hansen Elementary School	Elementary KG, 01, 02, 03, 04, 05, 06	Met	Met	No Support Required	58.4 Commendable
Holmes Junior High School	Junior-High 07, 08, 09	Met	Met	No Support Required	60.81 High Performing
Lincoln Elementary School	Elementary KG, 01, 02, 03, 04, 05, 06	Met	Met	Extended Targeted Year 2	59.46 Commendable
North Cedar Elementary School	Elementary KG, 01, 02, 03, 04, 05, 06	Met	Met	No Support Required	56.2 Commendable
Orchard Hill Elementary School	Elementary KG, 01, 02, 03, 04, 05, 06	Met	Targeted	Targeted Year 1	56.23 Commendable
Peet Junior High School	Junior-High 07, 08, 09	Met	Met	No Support Required	62.38 High Performing
Southdale Elementary School	Elementary KG, 01, 02, 03, 04, 05, 06	Met	Met	No Support Required	55.16 Commendable

Data Source: Iowa State Department of Education, 2023.

Scores on HUD's School Proficiency Index, which runs from 0 to 100, range from 0 to 96 across all census tracts in Waterloo-Cedar Falls. The tracts with the highest scores tend to be located in Cedar Falls, where schools score between 58 to 96. Waterloo tends to have the lowest scores when comparing both cities. In Waterloo, the lowest scores are found within the RECAPs tract and further throughout the central portion of the city where scores are as low as 0 to 12. These tracts also have a higher concentration of diverse populations including Black/African American and Hispanic/Latino residents, (See Figure 1).

FIGURE 17.
SCHOOL PROFICIENCY INDEX / ETHNICITY IN WATERLOO-CEDAR FALLS



TRANSPORTATION

Affordable, accessible transportation makes it easier for residents to access a range of opportunities, providing connections to employment, education, fresh food, healthcare, and other services. Low-cost public transportation can facilitate access to these resources, while a lack to access to affordable transportation poses barriers to meeting key needs, particularly in areas with low walkability and a lack of access to vehicles.

Access to Affordable Transportation

Waterloo and Cedar Falls are served the Metropolitan Transit Authority (Met) which operates its 10 fixed-route services Monday through Friday, 5:45AM to 6:15PM and Saturday 7:15AM to 6:15PM. The bus routes cover most of Waterloo and Cedar Falls and two lines connect both cities. Met Transit also offers paratransit services door-to-door on Monday through Friday 8:00AM to 4:00PM or Saturdays 8:45AM to 4:45PM. In order to qualify, an individual must meet one of the following conditions established by the Americans with Disabilities Act (ADA):

- You are unable to get on or off a transit bus.
- You are unable to get to or from a fixed route bus stop.
- You are unable to wait at a fixed-route bus stop.
- You are unable, for reason of disability, to ride the fixed-route buses or to understand and follow transit instructions.

Thus, paratransit eligibility is limited to those with functional abilities and whether their disabilities fully prevent them from utilizing MET Transit's fixed-route services and is not based on whether bus routes operate in the areas or times a person may need. In some cases, MET Transit requires verification of disability and need provided by a medical professional.

Stakeholders interviewed as part of this planning process emphasized that the MET Transit system is not a reliable system and that service and operating hours are extremely limiting for people who work late night or early morning shifts. Focus group participants also expressed using the bus system is inaccessible for most people with a disability. Many also do not qualify for paratransit according to the eligibility criteria and its service hours do not operate when people need it. The lack of accessible and efficient public transit options has prevented many residents without a vehicle from moving to different parts of

“TRANSPORTATION IS A HUGE ISSUE AND THERE IS A LACK OF HOUSING AVAILABLE.”

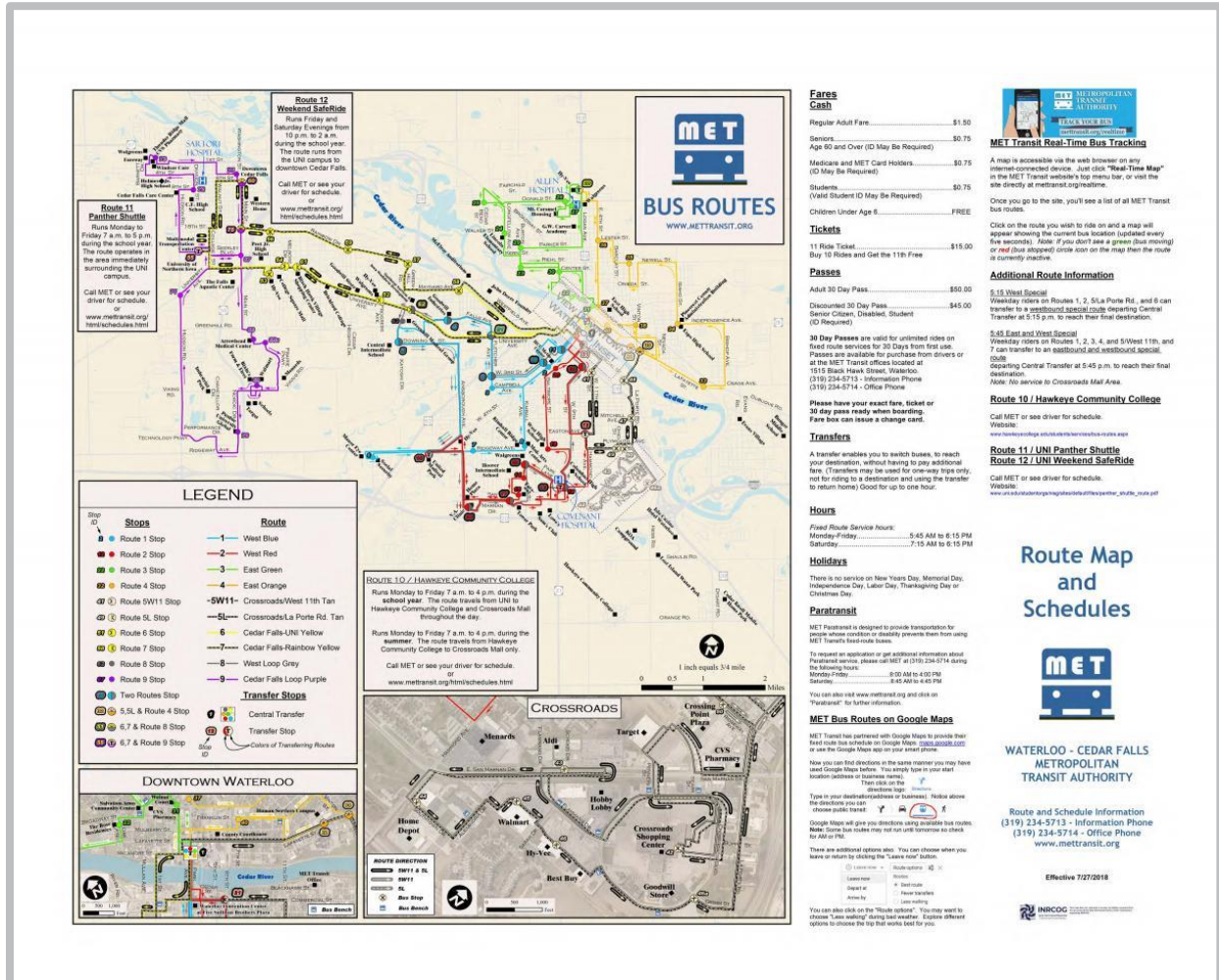
“EVERYTHING HAS GOTTEN SO EXPENSIVE AND A LOT HAS CHANGED IN THE LAST FEW YEARS.”

“PEOPLE STRUGGLE TO GET TO WORK AND THEY HAVE TO RELY ON A FRIEND, NEIGHBOR, ETC.”

-FOCUS GROUP PARTICIPANTS

the city as well as finding new employment opportunities. Commuting between both cities was another challenge different community engagement participants noted which creates a divide for those seeking housing, employment, or other services and resources in either city.

FIGURE 18: MET TRANSIT BUS ROUTES

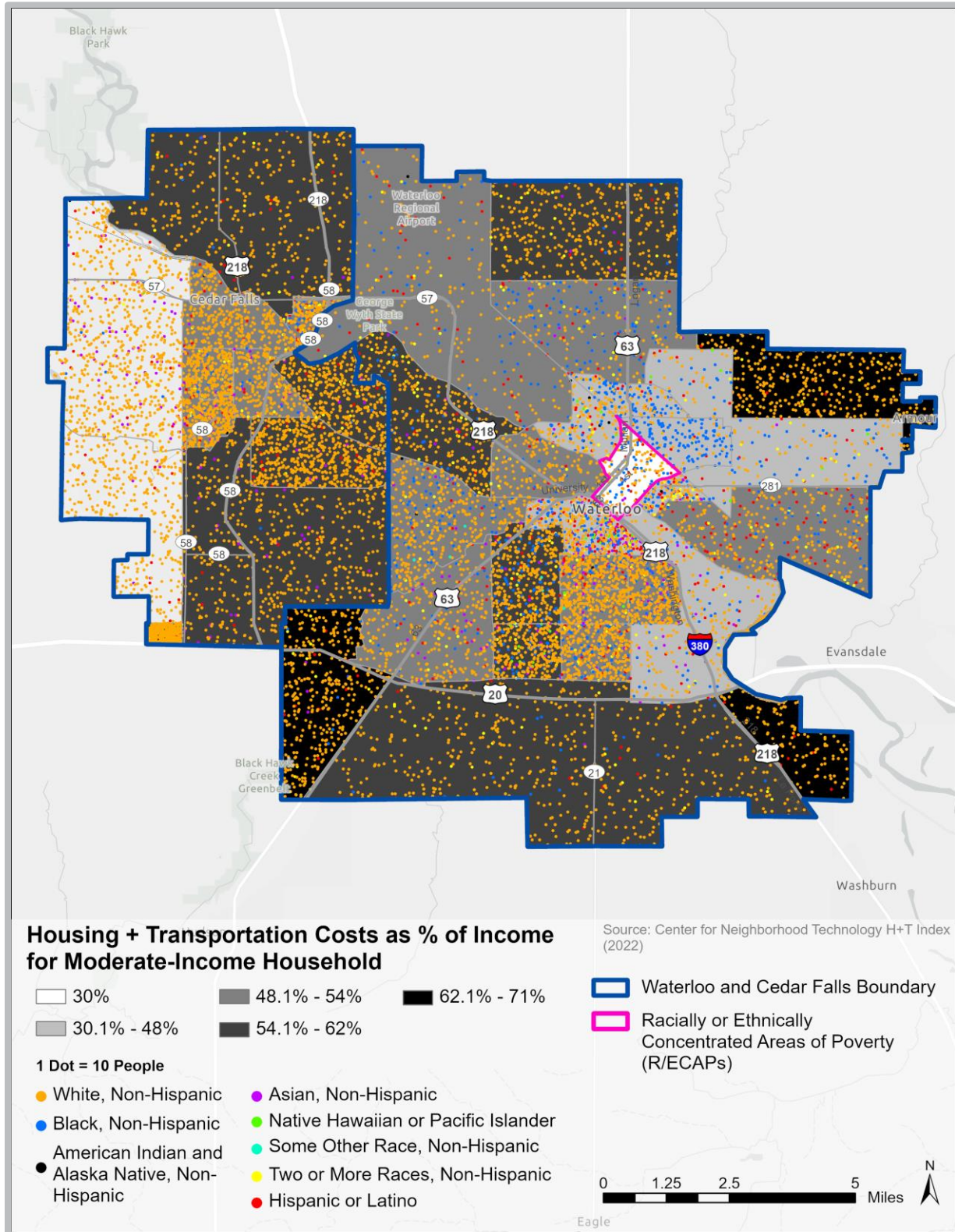


Combined housing and transportation costs are highest in the the outer census tracts of Waterloo and lowest in central Waterloo. Central Waterloo has close proximity to various transfer lines and routes for traveling throughout Waterloo and connecting to Cedar Falls. In Cedar Falls, housing and transportation costs tend to mostly make up 54.1% to 62% of income for moderate-income households, (See Figure 19).

In these areas of the region, a combination of low proximity to jobs and a high proportions of residents' incomes spent on transportation may present barriers to obtaining and maintaining employment.

Residents and stakeholders who participated in this planning process emphasized that the combination of a lack of affordable housing and lack of public transportation in Waterloo-Cedar Falls is a primary barrier for residents in the region in accessing the variety of employment, job training, and educational opportunities available in the cities.

FIGURE 19 – HOUSING AND TRANSPORTATION COSTS + RACE/ ETHNICITY

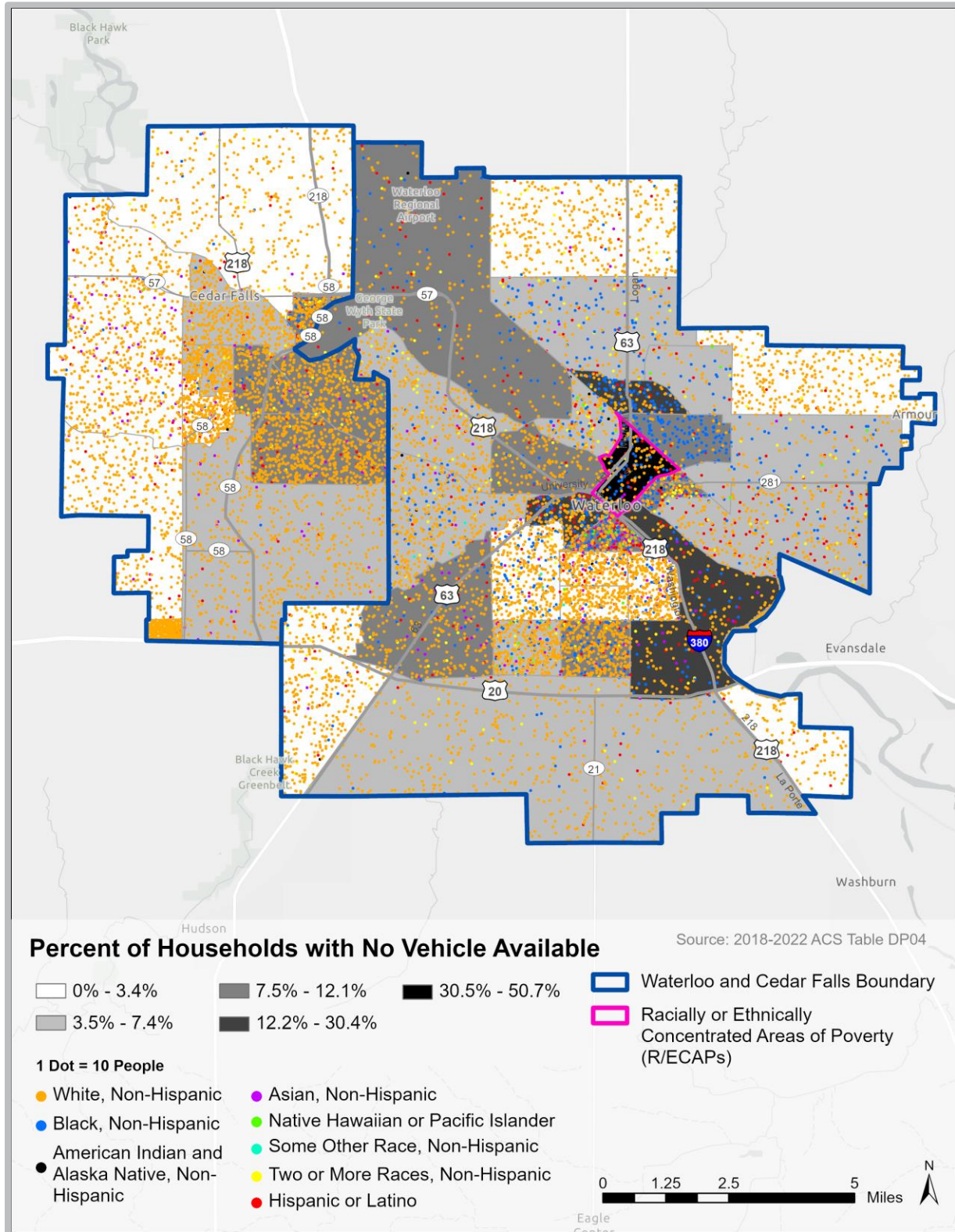


Vehicle Access

Access to vehicles is another indicator of residents' access to transportation, particularly in areas with limited access to public transit. An estimated 9.8% of households in Waterloo, 5.5% of households in Cedar Falls, and 7.3% of households in Black Hawk County do not have access to a vehicle, according to American Community Survey 5-Year Estimates for 2018 to 2022. Residents in central Waterloo tend to have the lowest levels of vehicle access in both cities; these census tracts, including the RECAPs tract, between 30.5% and 50.7% of households do not have a vehicle.

Stakeholders who participated in this planning process emphasized that a lack of access to vehicles is often a barrier to employment for residents living in areas with low proximity to jobs and without access to public transportation. A lack of access to vehicles also creates barriers to accessing needed services in areas in which those services are not located within walking distance and transit access is limited. In this way, residents without access to vehicles often find their housing choices limited to locations where public transportation is available.

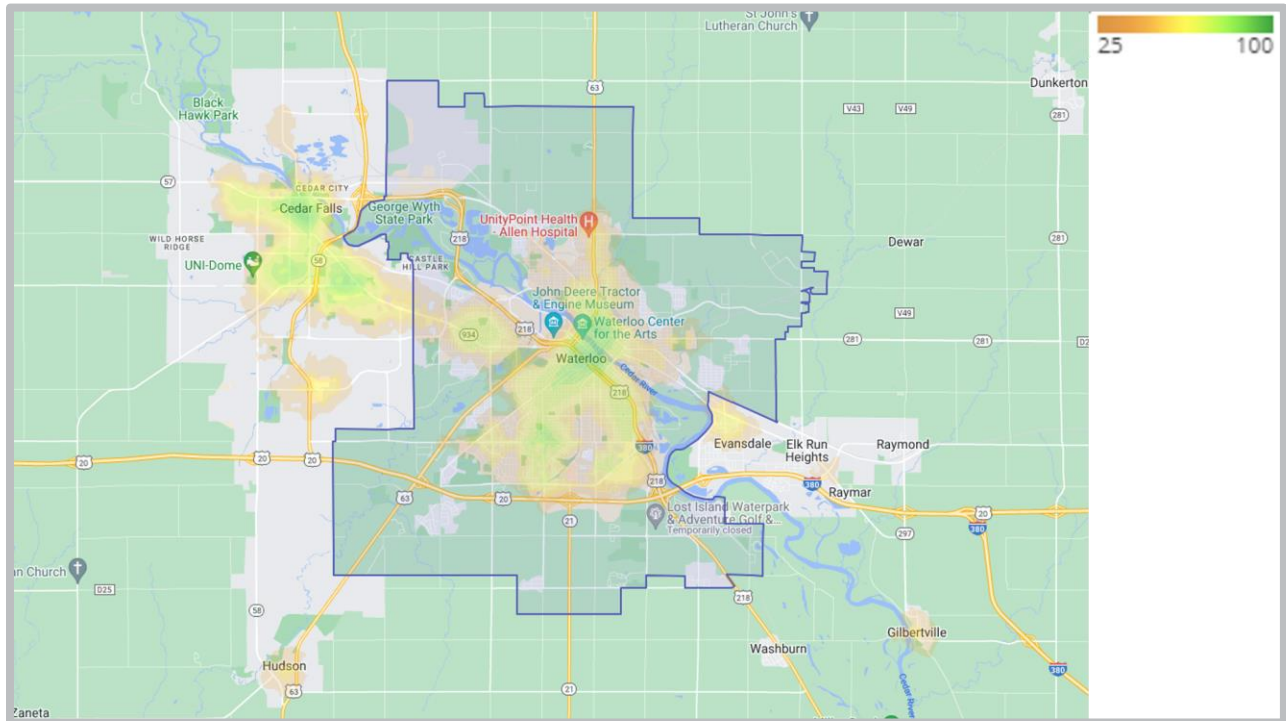
FIGURE 20 – VEHICLE ACCESS + RACE/ ETHNICITY



Walkability

Along with access to transit and low-cost transportation, walkability shapes the extent to which residents are able to access employment, resources, and services. The region is generally car-dependent, with the highest levels of walkability existing in the inner-ring neighborhoods of Waterloo and Cedar Falls.

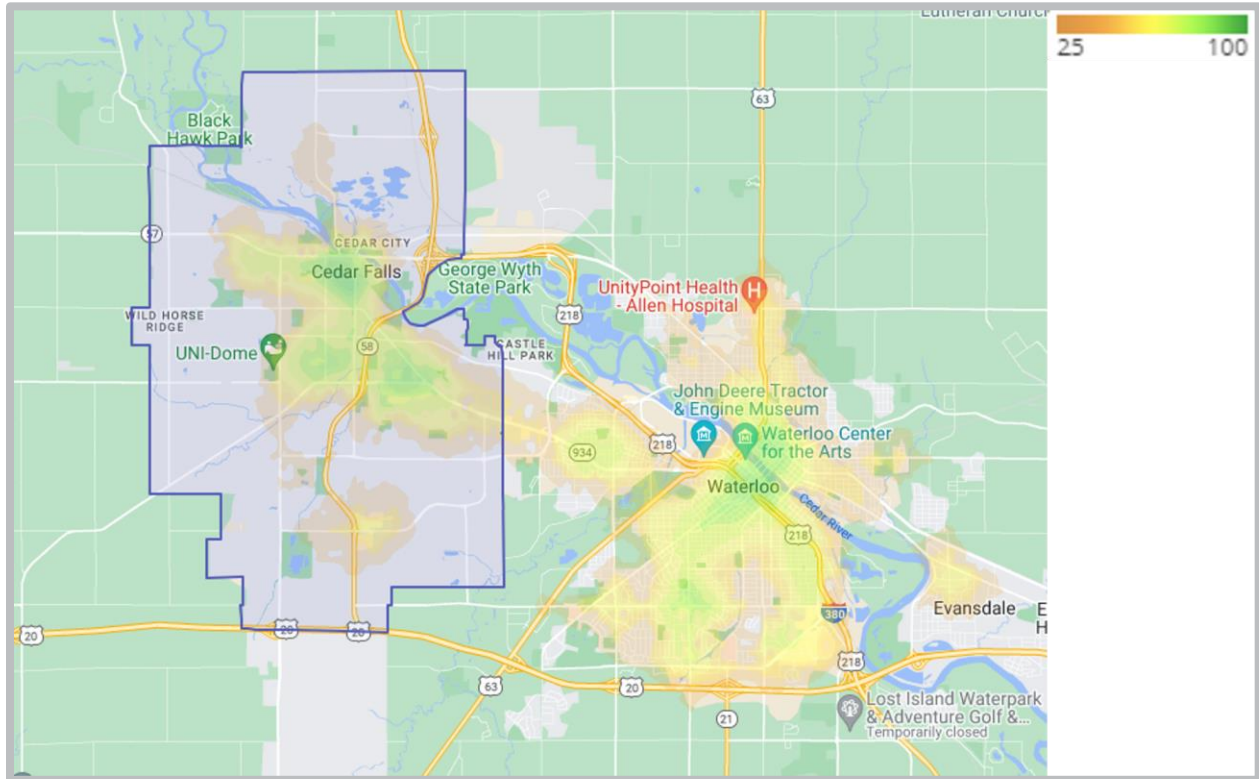
FIGURE 21: WALKABILITY, WATERLOO



The City of Waterloo scores 37 out of 100 on Walk Score's walkability index,¹⁸ indicating that most errands require a car (see Figure 21). The City of Cedar Falls scores a 38, indicating that most errands require a car as well (see Figure 22).

¹⁸ Walk Score measures the walkability of any address by analyzing hundreds of walking routes to nearby amenities using population density and road metrics such as block length and intersection density. Data sources include Google, Education.com, Open Street Map, the U.S. Census, Localeze, and places added by the Walk Score user community. Points are awarded based on the distance to amenities in several categories including grocery stores, parks, restaurants, schools, and shopping. The measure is useful in showing not only walkability but also access to critical facilities.

FIGURE 22: WALKABILITY, CEDAR FALLS



Residents and stakeholders emphasized that many areas of the region lack sidewalk repairs, making accessing resources and services via walking more difficult and less safe, particularly for residents with disabilities. In this way, low levels of transit and vehicle access may pose a more significant barrier to accessing jobs and services for residents living in areas with low levels of walkability. Overall low levels of walkability in the region combined with low levels of access to low-cost transportation point to challenges for residents without access to vehicles in accessing employment, resources, and services.

ENVIRONMENTAL QUALITY

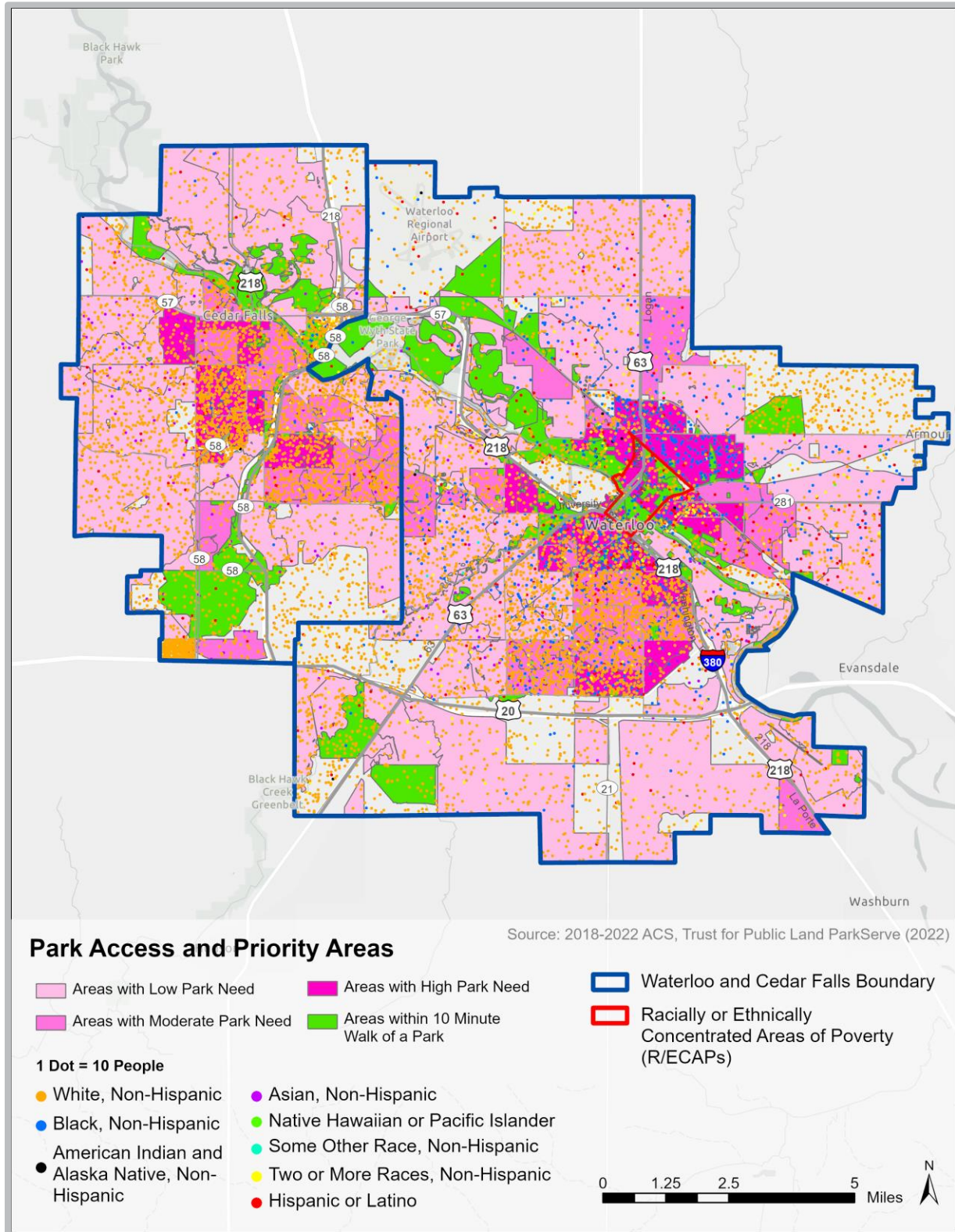
Environmental quality and access to environmental amenities also shape the opportunities available to residents. Access to parks and other green infrastructure in counties, cities, and neighborhoods provides a range of environmental, social, and health benefits, including access to nature and recreation opportunities; cleaner air and water; alternative transportation options; improvements in physical and mental health and wellbeing; and opportunities for food production and other local economic development. At the same time, environmental hazards, such as poor air quality and toxic facilities, are associated with negative health effects including increased respiratory symptoms, hospitalization for heart or lung diseases, cancer and other serious health effects, and even premature death. Certain population groups, such as children, have a greater risk of adverse effects from exposure to pollution.¹⁹

Access to Parks and Environmental Amenities

Access to environmental amenities is an important component of environmental health. In Waterloo-Cedar Falls, parks are most accessible in north-east Waterloo and Cedar Falls in which most residents live within a 10-minute walk of a park, (See Figure 23). However, the most densely populated areas of Waterloo and Cedar Falls have high park need. Areas in the outer neighborhoods of Waterloo and Cedar Falls have low park need.

¹⁹ U.S. Environmental Protection Agency. (n.d.). *Managing Air Quality - Human Health, Environmental and Economic Assessments*. Retrieved from: <https://www.epa.gov/air-quality-management-process/managing-air-quality-human-health-environmental-and-economic>

FIGURE 23: PARK ACCESS + RACE/ETHNICITY




Stakeholders emphasized that significant variation exists between lower- and upper-income areas with regard to the quality of parks, available amenities, and maintenance particularly between Waterloo and Cedar Falls.

About 51.6% of Waterloo survey respondents noted that parks and trails are equally provided in their communities, while about 32.9% stated that they are not equally available. About 77.8% of Cedar Falls survey respondents noted that parks and trails are equally provided, while about 25.0% said that they are not equally provided.

Environmental Hazards

SUPERFUND AND OTHER HAZARDOUS WASTE SITES

Toxic sites may pose risks to residents living nearby and thus may constitute fair housing concerns if they disproportionately impact protected classes. A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. These sites are placed on the National Priorities List (NPL). In the Waterloo-Cedar Falls HOME Consortium region, there is one NPL site located in Waterloo (see Figure 24).²⁰

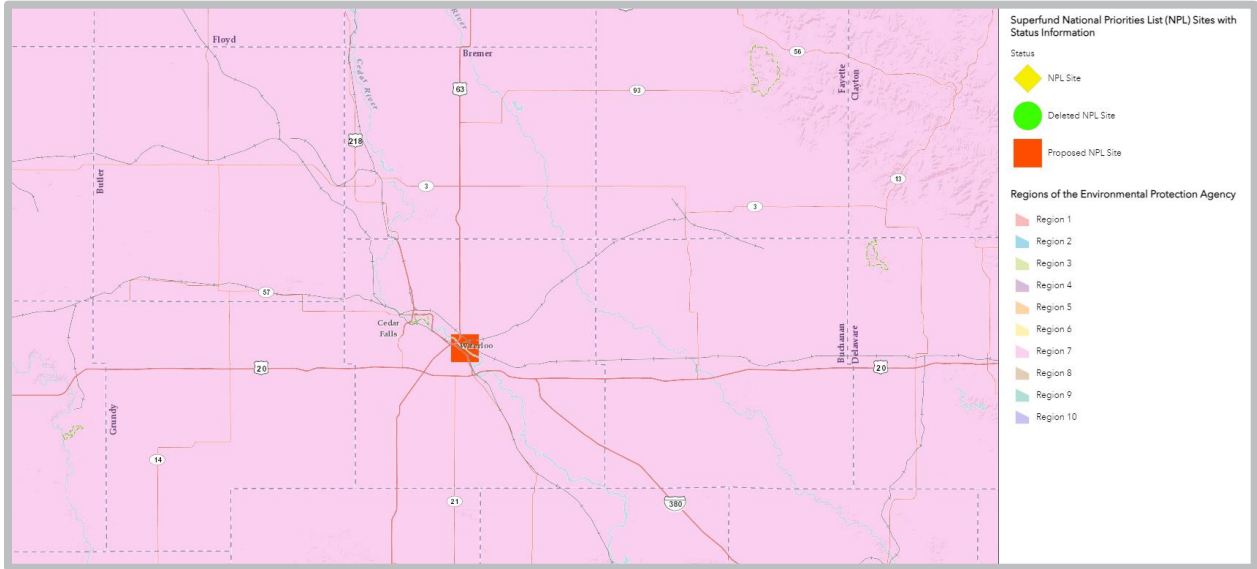


“[I] LIVE ACROSS THE STREET FROM A PARK THAT IS BEING REHABBED SO I FEEL THAT THERE IS GOOD ACCESS TO PARKS IN THE CITY BUT I KNOW OTHERS WOULD DISAGREE BECAUSE SOME PARKS HAVE OLDER EQUIPMENT.”

-WATERLOO STAKEHOLDER
INTERVIEWEE

²⁰ U.S. EPA. (n.d.). Search for Superfund Sites Where You Live. Retrieved from: <https://www.epa.gov/superfund/search-superfund-sites-where-you-live>

FIGURE 24 – SUPERFUND NATIONAL PRIORITIES LIST (NPL) SITES, WATERLOO-CEDAR FALLS HOME CONSORTIUM REGION

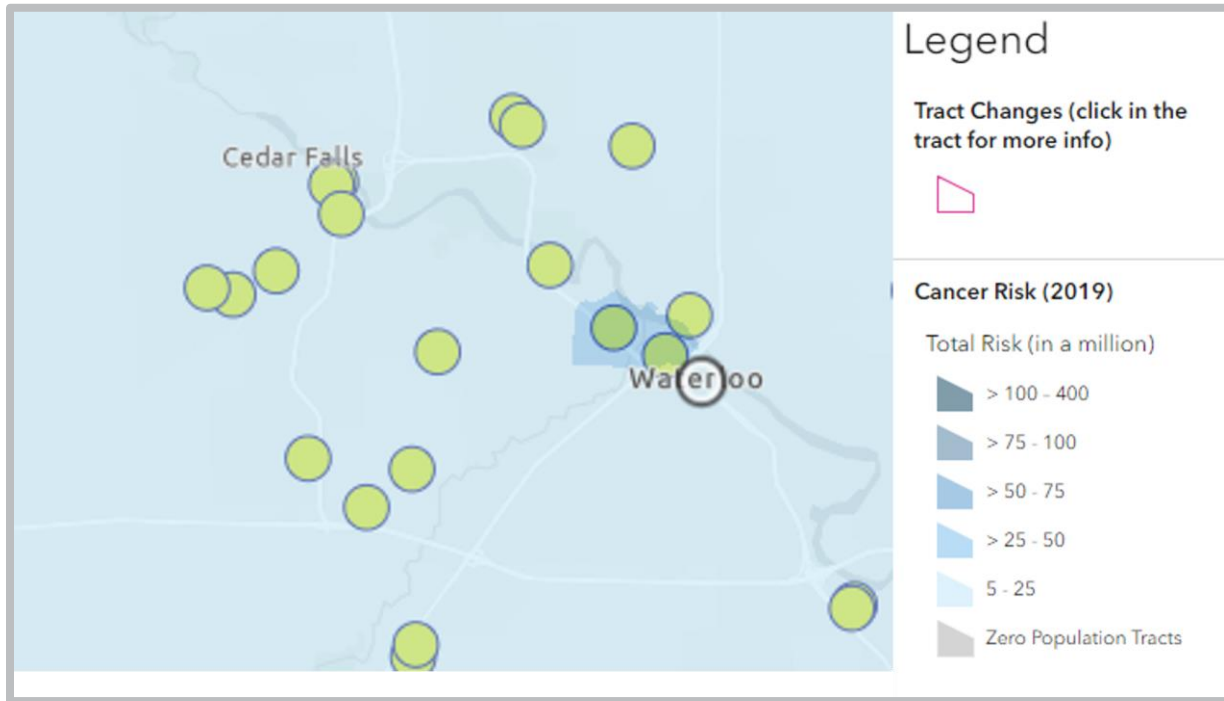


Source: U.S. EPA

AIR TOXICS AND TOXIC RELEASE FACILITIES

The EPA's National Air Toxics Assessment (NATA) estimates health risks from air toxics. The most recent assessment, released in 2021, uses data from 2019 to examine cancer risk from ambient concentrations of pollutants. Areas in the region with the highest cancer risk include a one tract in central Waterloo which has a risk for 30 per million population (see Figure 25). Point sources of emissions are clustered in central Waterloo and Central Cedar Falls, with fewer facilities dispersed across the outer neighborhoods of both cities.

FIGURE 25 – AIR TOXICS AND CANCER RISK (PER MILLION POPULATION), WATERLOO-CEDAR FALLS



Source: Environmental Protection Agency National Air Toxics Assessment (NATA)

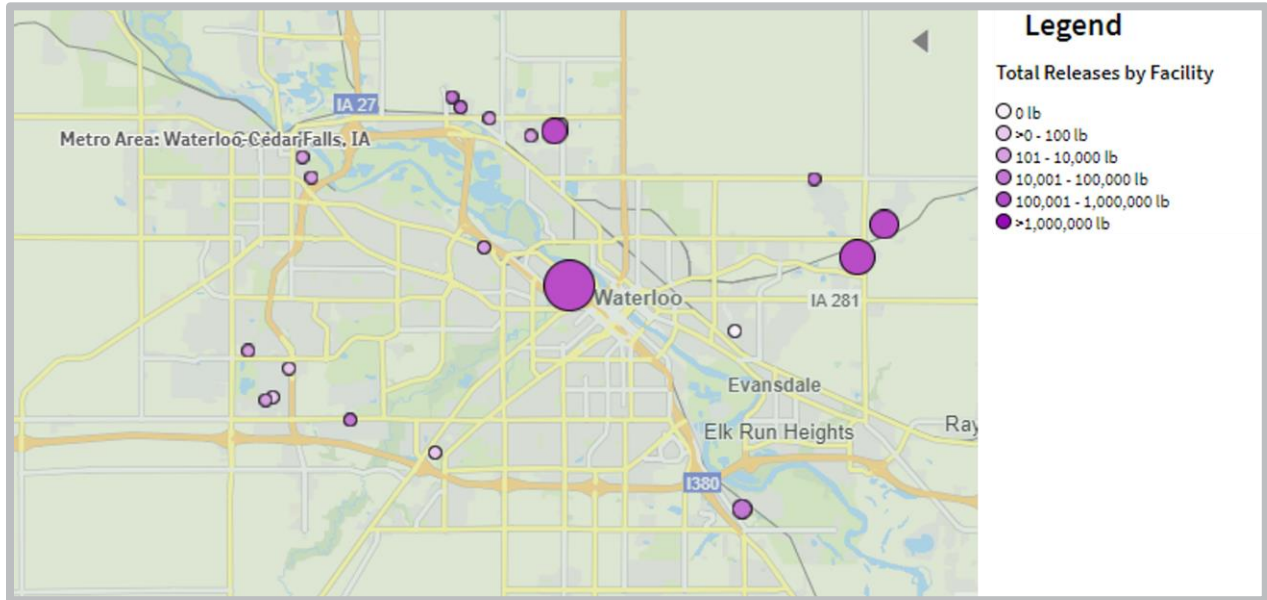
The Environmental Protection Agency's Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment.²¹ Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. The EPA's Risk-Screening Environmental Indicators (RSEI) Model analyzes TRI data on the amount of toxic chemicals released, together with risk factors such as the chemical's fate and transport through the environment, each chemical's relative toxicity, and the number of people potentially exposed, to calculate a numeric score designed to be compared to other RSEI scores²².

Toxic release inventory sites in the region are clustered in central Waterloo and central Cedar Falls. However, the facility with the highest number of toxic releases is found in Waterloo (John Deere Waterloo Works Drivetrain Operations and Foundry, machinery and primary metals, see Figure 26).

²¹ U.S. EPA. (n.d.) Toxic Release Inventory Program. Retrieved from: <https://www.epa.gov/toxics-release-inventory-tri-program/what-toxics-release-inventory>. Data retrieved from: <https://www.arcgis.com/home/item.html?id=2c4a0b5f85b945f8a67125e6a93fa7fe>

²² United States Environmental Protection Agency. (n.d.) Risk-Screening Environmental Indicators (RSEI) Model. Retrieved from: <https://www.epa.gov/rsei>.

FIGURE 26 – TOXICS RELEASE INVENTORY, WATER-LOO CEDAR FALLS



Source: U.S. EPA

FOOD

Access to food that is both affordable and nutritious is a challenge for many individuals and families in the United States. In neighborhoods in which the nearest grocery store is many miles away, transportation costs and lack of vehicle access may present particular challenges for low-income households, who may be forced to rely on smaller stores that are often unaffordable and may not offer a full range of healthy food choices. Even in areas in close proximity to food outlets, the higher cost of healthy foods such as produce often present barriers to healthy food access.²³

Analysis of the most recently available USDA Food Research Atlas data, from 2019, indicates that the proportion of residents who have low incomes and live further than ½ mile from a supermarket tends to be highest in census tracts in north-west and south Waterloo where more than 84.8% of residents have low incomes and live more than ½ mile from a supermarket. In the east and south-east portions of Cedar Falls, more than 48.1% of residents have low incomes and live further than a ½ mile from a supermarket. In 2023, the first full-service grocery store in over 50 years in downtown Waterloo had its grand opening. All-In-Grocers was a \$10.2 million investment and received over \$2 million in incentives from the city after several investors left and delays from the pandemic and inflation stalled the project²⁴. The U.S. Department of Agriculture has recognized downtown Waterloo as a food desert where access to healthy food options is limited. The new All-In-Grocers store aims to close this gap and provide healthy and affordable food while also employing local residents and community members.

Stakeholders interviewed during this planning process also noted lower levels of food access in Waterloo. Survey respondents for Waterloo and Cedar Falls echoed concerns surrounding food access, with 62.8% and 60.0%,



“I THINK WE COULD IMPROVE UPON HAVING GROCERY AND/OR HOUSEHOLD NECESSITY STORES WITHIN REASONABLE WALKING DISTANCE TO MOST RESIDENTIAL NEIGHBORHOODS.”

-CEDAR FALLS SURVEY RESPONDENT

“THERE ARE TOO MANY FOOD DESERTS. WE NEED MORE ACCESS TO HEALTHY AND LOCAL FOOD.”

-WATERLOO SURVEY RESPONDENT

²³ Valdez Z, Ramirez AS, Estrada E, Grassi K, Nathan S. Community Perspectives on Access to and Availability of Healthy Food in Rural, Low-Resource, Latino Communities. *Prev Chronic Dis* 2016;13:160250.

²⁴ Promnitz, Donald. Downtown Waterloo ‘All-In’ on new grocery store seven years in the making. *The Courier*. https://wfcourier.com/news/local/business/development/all-in-grocers-opens-downtown-waterloo/article_0f0bedae-6229-11ee-af78-57736f4b5480.html

respectively, noting that grocery stores and other shopping opportunities are not equally available in their communities.

FIGURE 27. FOOD ACCESS + RACE/ ETHNICITY

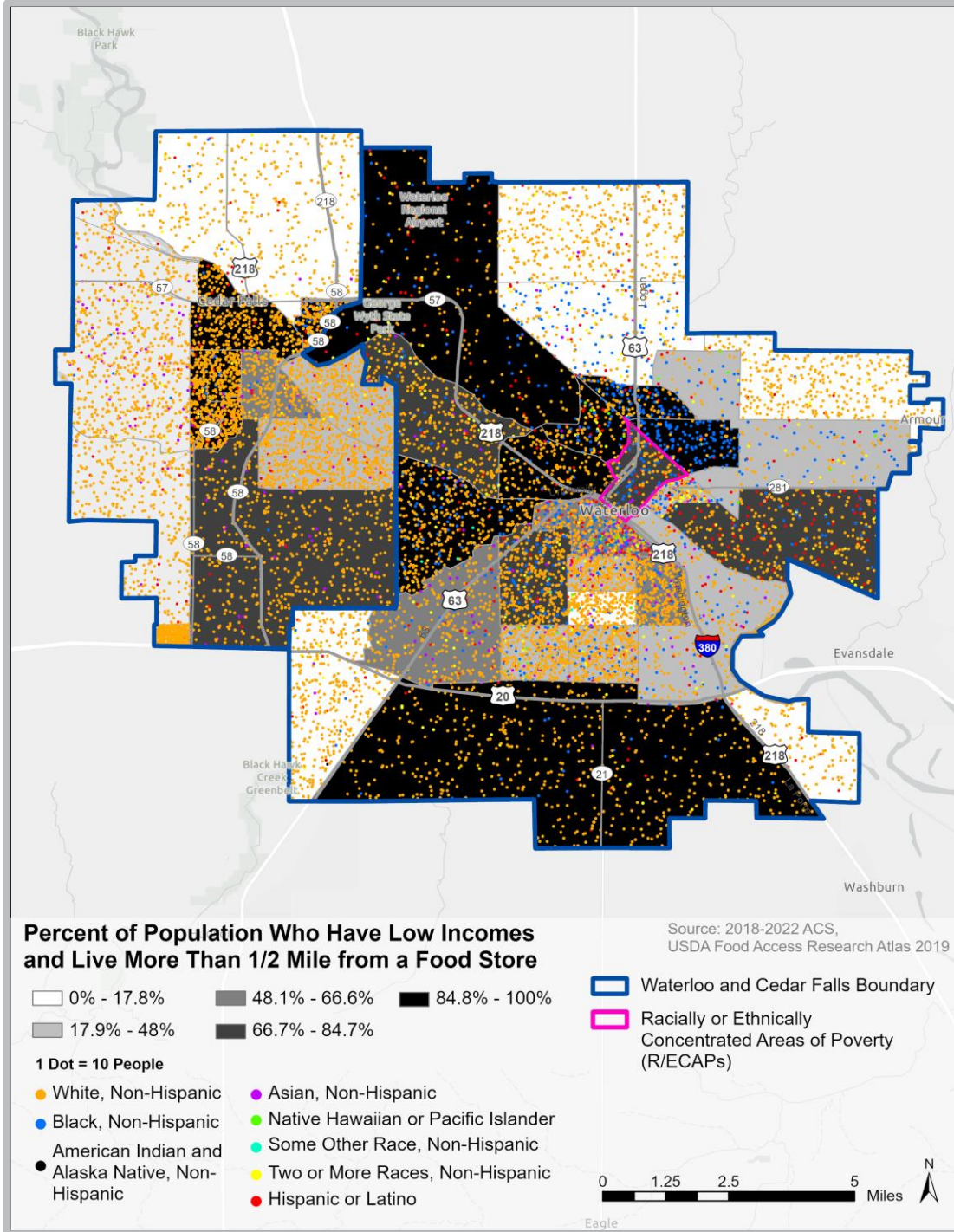


FIGURE 28: ALL-IN-GROCCERS IN DOWNTOWN WATERLOO



All-In-Grocers in Downtown Waterloo
Source: Waterloo-Cedar Falls Courier

Poverty and a lack of access to vehicles also contribute to food insecurity in the region. An estimated 17.4% of residents in Waterloo, 17.0% of residents in Cedar Falls, and 15.7% of residents in Black Hawk County were living below the federal poverty level as of the 2018-2022 American Community Survey Five-Year Estimates, indicating that low incomes are a substantial barrier for a substantial portion of residents in accessing fresh food. Disparities in poverty exist by race: 57.9% of American Indian/Alaska Native residents were living below the poverty level in 2018-2022, followed by Black/African American residents (40.4%) in Waterloo. In Cedar Falls, Native Hawaiian/Other Pacific Islander residents had the highest rate of residents living below the poverty level (42.0%), followed by Black/African American residents (31.7%).

Further, in many central Waterloo census tracts, between 30.5% and 50.7% of residents do not have access to a vehicle, indicating that barriers to food access exist in areas of the region with limited access to public transportation and low levels of walkability. In this way, the combination of uneven distribution of food outlets across the region, the substantial proportions of households with low incomes, and a lack of access to vehicles create barriers to food access and security.

HEALTHCARE

Access to high-quality, affordable physical and mental healthcare shapes community health outcomes, including both length and quality of life. The ratios of clinical care providers to population across counties. Residents of Black Hawk County tend to have lower (better) ratios of population to healthcare providers, including one primary care physician per 1,300 residents, one dentist per 1,300 residents, and one mental health provider per 450 residents, indicating overall higher levels of access than in the state of Iowa overall (see Table 7). Residents of Black Hawk County tend to have the highest ratios of population to mental health providers compared to the United States overall, pointing to lower levels of access to mental health providers in rural areas of the region.

TABLE 7. RATIOS OF POPULATION TO HEALTHCARE PROVIDERS, BLACK HAWK COUNTY AND IOWA STATE

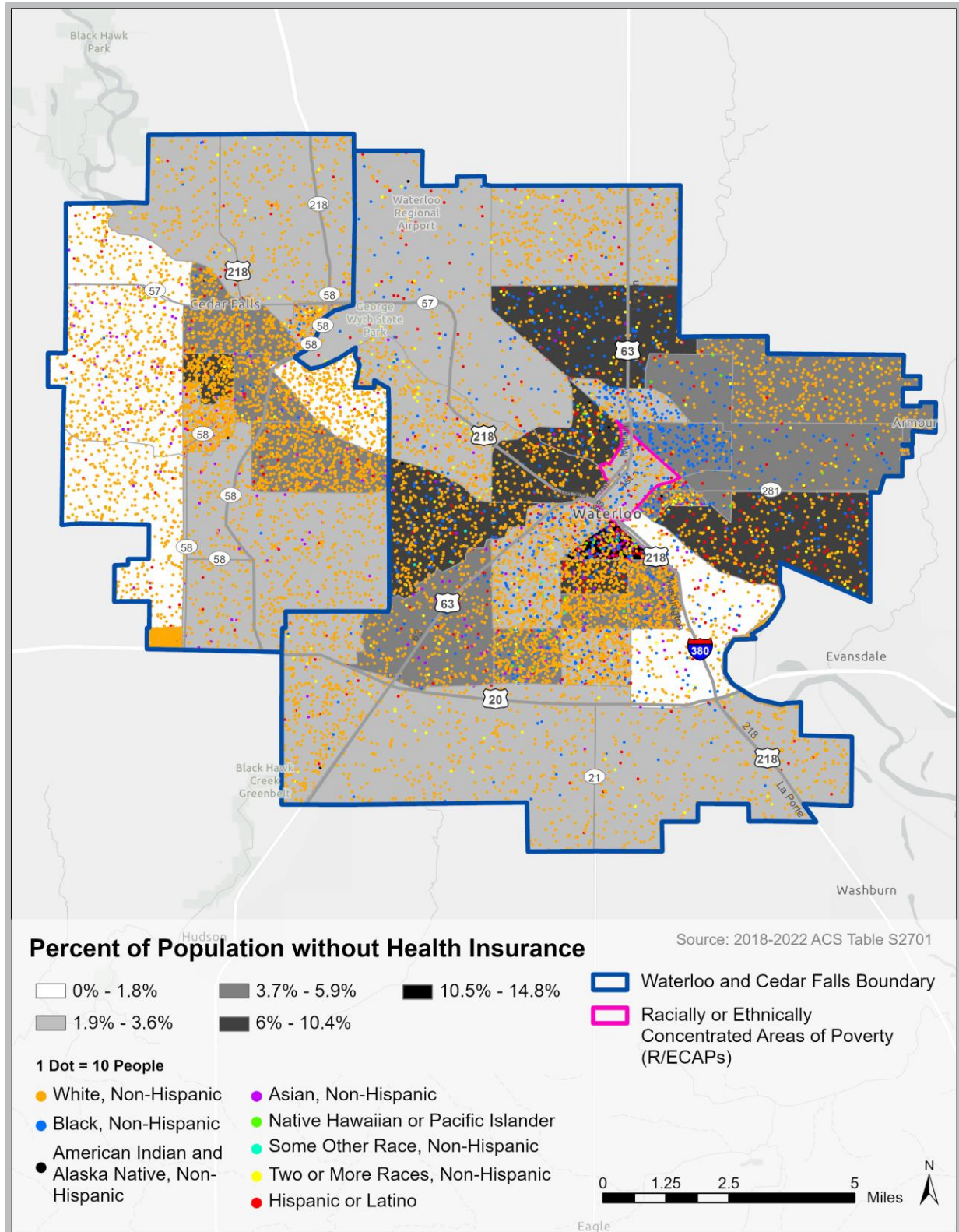
	Black Hawk County	Iowa	United States
Primary Care Physicians	1,000:1	1,360:1	1,310:1
Dentists	1,300:1	1,430:1	1,380:1
Mental Health Providers	450:1	530:1	340:1

Source: County Health Rankings, 2023

Disparities also exist across the region regarding access to health insurance. Residents in Waterloo tend to be uninsured at the highest rates compared to Cedar Falls (6% to 14.8% uninsured residents in central and east Waterloo, (see Figure 29). Most of the census tracts in Cedar Falls have between 1.9% to 5.9% of residents who are uninsured. One census tract in Cedar Falls has the highest rate of uninsured residents in the city, (10.5% to 14.8% of residents).

In this way, residents of Waterloo are likelier to have reduced access to healthcare due to several factors, including gaps in safety net service in some zip codes, lower levels of health insurance coverage, and lack of access to vehicles or other transportation options. Programs designed to support access to healthcare may help increase access. These may include mobile clinics, development of community-based clinics in underserved areas, transportation assistance to support access to healthcare, community health workers, and sliding scale services for low-income uninsured residents, among others.

FIGURE 29. ACCESS TO HEALTH INSURANCE + RACE/ ETHNICITY



CHAPTER 6.

HOUSING PROFILE

The availability of quality, affordable housing plays a vital role in ensuring housing opportunities are equally accessible to all residents. On the surface, high housing costs in certain areas are exclusionary based solely on income. But the disproportionate representation of several protected class groups in low- and middle-income levels can lead to unequal access to housing options and neighborhood opportunity in high-cost housing markets. Black and Hispanic residents, immigrants, people with disabilities, and seniors often experience additional fair housing barriers when affordable housing is scarce.

Beyond providing fair housing options, the social, economic, and health benefits of providing quality affordable housing are well-documented. National studies have shown affordable housing encourages diverse, mixed-income communities, which result in many social benefits. Affordable housing also increases job accessibility for low- and middle-income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is also linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing.²⁵ Developing affordable housing is also a strategy used to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness.²⁶ Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to socioeconomically disadvantaged neighborhoods where housing costs are most affordable.²⁷

This section discusses the existing supply of housing in the study area. It also reviews housing costs, including affordability and other housing needs by householder income. Homeownership rates and access to lending for home purchases and mortgage refinancing are also assessed.

²⁵ Maqbool, Nabihah, et al. "The Impacts of Affordable Housing on Health: A Research Summary." *Insights from Housing Policy Research*, Center for Housing Policy, www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.et.al.pdf.

²⁶ "State of the Nation's Housing 2015." Joint Center for Housing Studies of Harvard University, <http://www.jchs.harvard.edu/sites/default/files/jchs-sonhr-2015-full.pdf>

²⁷ Deirdre Oakley & Keri Burchfield (2009) Out of the Projects, Still in the Hood: The Spatial Constraints on Public-Housing Residents' Relocation in Chicago." *Journal of Urban Affairs*, 31:5, 589-614.

HOUSING SUPPLY SUMMARY

According to the 2018-2022 American Community Survey (ACS), the cities of Waterloo and Cedar Falls have a combined total of 48,575 housing units. Just under two-thirds of these units are located in Waterloo, with the remainder located in Cedar Falls. 5,805, or around 12%, of the consortium's units have been constructed since the year 2000. Growth has been more prevalent in Cedar Falls, which has grown by nearly 25% since the year 2000, than in Waterloo, which has grown by about 8% in the same time period.

Vacancy data indicates that housing in Cedar Falls faces higher demand than housing in Waterloo – nearly 80% of the units added in Cedar Falls since 2000 are currently occupied, while less than one third of the units added to Waterloo within the same time period are currently occupied. This has resulted in Waterloo's vacancy rate increasing more significantly than Cedar Falls, although both cities currently have vacancy rates lower than the national average of 10.8% at 9.5% and 6.9% respectively.

Lower-than-average vacancy rates are an indication that housing access in a community may be limited due to an overall inadequate supply of units. This may be especially true in Cedar Falls, which has a current vacancy rate 36% lower than the national average. However, although still lower than average, vacancy rates in both cities have slightly more than doubled since the year 2000, indicating that there are likely additional factors limiting housing access in addition to overall unit supply.

Housing structure variety is important in providing housing options suitable to meet the needs of all residents, including different members of protected classes. Multifamily housing, including rental apartments, are often more affordable rental options than single-family homes for low- and moderate-income households, who are disproportionately likely to be non-white households. Multifamily units may also be the preference of some elderly and disabled householders who are unable or do not desire to maintain a single-family home.

Table 9 shows housing units by structure types in the Waterloo and Cedar Falls. Single-family detached units are the most common type of housing in both cities but are slightly more prevalent in Waterloo; while single-family attached homes, such as townhomes, are nearly twice as prevalent in Cedar Falls as in Waterloo. The second most common type of housing in both cities is mid-sized apartment complexes of 5-19 units, followed by large apartment complexes of 20 or more units. Duplexes, triplexes, and quadplexes are fourth most common in both cities, while mobile homes make up only around 3% of housing in both cities. Waterloo reports 17 atypical housing units such as RVs, boats, or vans, while Cedar Falls reports none.

TABLE 8 – HOUSING UNITS BY OCCUPANCY STATUS

	2000	2010	2018-2022	2000-2022 Change
Waterloo				
Total Housing Units	29,499	30,723	31,988	+2,489
Occupied Housing Units	28,169	28,607	28,947	+778
Vacant Housing Units	1,330	2,116	3,041	+1,711
Vacancy Rate	4.5%	6.9%	9.5%	+5.0
Cedar Falls				
Total Housing Units	13,271	15,477	16,587	+3,316
Occupied Housing Units	12,833	14,608	15,446	+2,613
Vacant Housing Units	438	869	1,141	+703
Vacancy Rate	3.3%	5.6%	6.9%	+3.6

Data Source: U.S. Census 2000 SF1 Table H003 and 2010 SF1 Table H3 and 2018-2022 5-Year American Community Survey Table B25002

TABLE 9 – HOUSING UNITS BY STRUCTURE TYPE

Structure Type	Waterloo		Cedar Falls	
	Number	Percent	Number	Percent
1 unit, detached	21,868	68.4%	10,042	60.5%
1 unit, attached	1,177	3.7%	1,148	6.9%
2-4 units	2,185	6.8%	1,232	7.4%
5-19 units	3,572	11.2%	1,974	11.9%
20 or more units	2,207	6.9%	1,626	9.8%
Mobile home	962	3.0%	565	3.4%
Other (RV, boat, van, etc.)	17	0.1%	0	0.0%
Total	31,988	100.0%	16,587	100.0%

Data Source: 2018-2022 5-Year American Community Survey, Table B25024

Availability of housing in a variety of sizes is important to meet the needs of different demographic groups. Neighborhoods with multi-bedroom detached, single-family homes will typically attract larger families, whereas dense residential developments with smaller unit sizes and fewer bedrooms often accommodate single-person households or small families. However, market forces and affordability impact housing choice and the ability to obtain housing of a suitable size, and markets that do not offer a variety of housing sizes at different price points can lead to barriers for some groups. Rising housing costs can, for example, lead to overcrowding as large households with lower incomes are unable to afford pricier, larger homes and are forced to reside in smaller units. On the other hand, people with disabilities or seniors with fixed incomes may not require large units but can be limited by higher housing costs in densely populated areas where most studio or one-bedroom units are located.

Table 10 shows housing units by the number of bedrooms and resident tenure (whether the occupants are renters or owners). In both Waterloo and Cedar Falls renter-occupied units tend to be smaller than owner-occupied units; when comparing the two cities regardless of tenure, homes in Waterloo tend to be smaller than homes in Cedar Falls.

In both cities 0.2% or less of homeowners live in a studio unit, while 3.6%-4.1% of renters live in a unit this size. Significantly more residents live in one-bed units in Waterloo than in Cedar Falls, regardless of tenure; in Waterloo, 3.4% of owners and 26% of renters live in these units, while in Cedar Falls, this number falls to 1.6% of owners and 16.3% of renters. Similarly, 78.6% of Waterloo owners and 65.7% of renters live in two- to three-bed units, while 58.1% of Cedar Falls owners and 57.3% of renters live in such a unit. Homes with four or more bedrooms are significantly more prevalent in Cedar Falls, where 40.1% of owners and 22.8% of renters live in a home this large. In Waterloo, only 17.9% of owners and 4.3% of renters live in a home with four or more bedrooms.

Assessing housing conditions in an area can provide a basis for developing policies and programs to maintain and preserve the quality of the housing stock. The age of an area's housing can have substantial impact on housing conditions and costs. As housing ages, maintenance costs rise, which can present significant affordability issues for low- and moderate-income homeowners. Aging rental stock can lead to rental rate increases to address physical issues or deteriorating conditions if building owners defer or ignore maintenance needs. Deteriorating housing can also depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Additionally, homes built prior to 1978 present the potential for lead exposure risk due to lead-based paint or lead pipes carrying drinking water.

TABLE 10 – HOUSING UNITS BY SIZE AND TENURE

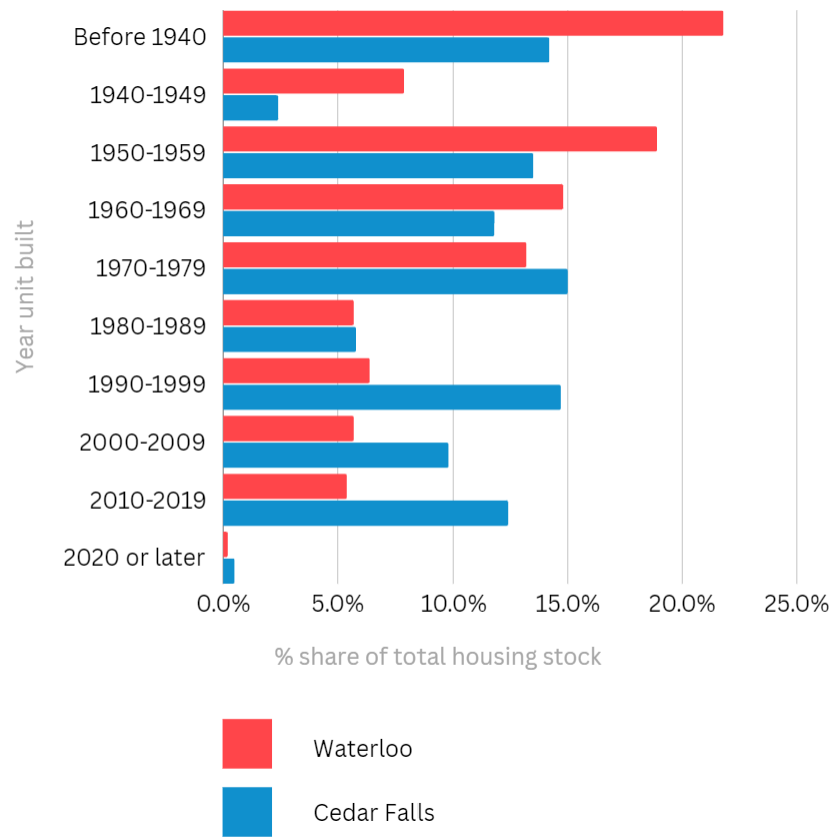
Number of Bedrooms	Waterloo		Cedar Falls	
	Number	Percent	Number	Percent
Owner-Occupied Housing Units				
Zero	31	0.2%	14	0.1%
One	592	3.4%	158	1.6%
Two or three	13,824	78.6%	5,615	58.1%
Four or more	3,151	17.9%	3,872	40.1%
Total	17,598	100.0%	9,659	100.0%
Renter-Occupied Housing Units				
Zero	464	4.1%	207	3.6%
One	2,946	26.0%	946	16.3%
Two or three	7,452	65.7%	3,315	57.3%
Four or more	487	4.3%	1,319	22.8%
Total	11,349	100.0%	5,787	100.0%

Note: Unoccupied units are not included in this table because tenure data is not available for these units.

Data Source: 2018-2022 5-Year American Community Survey, Table B25042

Age of housing across Waterloo and Cedar Falls is shown in Figure 30 below. Data indicates that the oldest housing stock is found in Waterloo, where more than 20% of all homes were built before the year 1940. Conversely, Cedar Falls has built a larger percentage of new homes than Waterloo in every decade since 1970. More than three-quarters of Waterloo homes were constructed before 1980 and are therefore likely at risk of lead exposure, in comparison to 57% of Cedar Falls homes. (Note that American Community Survey data is available by decade only and therefore data is not available specifically on homes constructed prior to 1978). Aging housing stock can create a barrier to fair housing when low-income residents are unable to afford repairs to units or are forced to live in homes or neighborhoods in disrepair due to affordability concerns.

FIGURE 30 – AGE OF HOUSING IN THE WATERLOO-CEDAR FALLS HOME CONSORTIUM



Data Source: 2018-2022 5-Year American Community Survey, Table B25034

HOUSING COSTS AND AFFORDABILITY

The most common housing needs identified by stakeholders are related to affordability, particularly for low- and moderate-income households. Many residents who participated in the community engagement process noted that housing costs frequently rise faster than wages, which creates affordability issues for households who already have tight budgets. A lack of affordable housing options frequently leads to cost burden, as described in the next section titled Housing Needs.

Housing Cost by Unit Size

The National Low Income Housing Coalition's annual *Out of Reach* report examines rental housing rates relative to income levels for counties throughout the U.S. Figure 31 below shows annual household income and hourly wages needed to afford Fair Market Rents (FMRs) in Black Hawk County for one, two, three, and four-bedroom rental units in 2023.

FIGURE 31– REQUIRED INCOME, WAGES, AND HOURS TO AFFORD FAIR MARKET RENTS IN BLACK HAWK COUNTY, IOWA

HOUSING COSTS (FAIR MARKET RENTS)	ANNUAL INCOME NEEDED TO AFFORD	HOURLY WAGE FOR 40/HR WEEK NEEDED TO AFFORD	HOURS/WK AT AVG HOURLY WAGE NEEDED TO AFFORD	HOURS/WK AT MINIMUM WAGE NEEDED TO AFFORD
1 bedroom: \$740 2 bedroom: \$934 3 bedroom: \$1,241 4 bedroom: \$1,591	1 bedroom: \$29,600 2 bedroom: \$37,360 3 bedroom: \$49,640 4 bedroom: \$63,640	1 bedroom: \$14.23 2 bedroom: \$17.96 3 bedroom: \$23.87 4 bedroom: \$30.60	1 bedroom: 31 2 bedroom: 39 3 bedroom: 52 4 bedroom: 67	1 bedroom: 79 2 bedroom: 99 3 bedroom: 132 4 bedroom: 169

Minimum wage in Black Hawk County is \$7.25, and average renter income is \$38,304 per year or around \$18.40 per hour.

Housing Coalition Out of Reach 2023, Accessed from <https://nlihc.org/oor/state/ia>

Fair Market Rent (FMR) is a standard set by HUD at the county or regional level for use in administering its Section 8 rental voucher program. FMRs are typically the 40th percentile gross rent (i.e., rent plus utility costs) for typical, non-standard rental units in the local housing market.

As shown in Table 10, the most common rental unit size in both cities is a two- to three-bed unit. Figure 31 shows that the NLIHC determined that in 2023 in Black Hawk County, the average rental cost for a two-bed unit was \$934 per month and the average cost for a three-bed unit was \$1,241 per month. To afford this rent without being cost burdened (i.e. spending more than 30% of income on housing), a household would require an annual income of at \$37,000-\$49,000. This amount translates to a 40-hour work week at an hourly wage of \$14 to \$18 per hour. For a single minimum wage worker earning \$7.25 per hour, it would take a 132-hour work week to afford a three-bedroom unit. The NLIHC also reported that the average renter wage in Black Hawk County in 2023 was \$18.40, which is less than the hourly wage needed to afford a three-bedroom unit at fair market

rent. Even at average renter wages, a worker would need to work 52 hours per week to afford this unit.

A household earning average renter wages could afford a two-bedroom unit, if available at the fair market rent of \$934. To cover the cost of the unit, the household would need an annual income of \$37,360 or higher or must work a 40-hour work week at an hourly wage of at least \$17.96. However, if a worker earned minimum wage, he or she would need to work 99 hours per week to afford a two-bedroom unit.

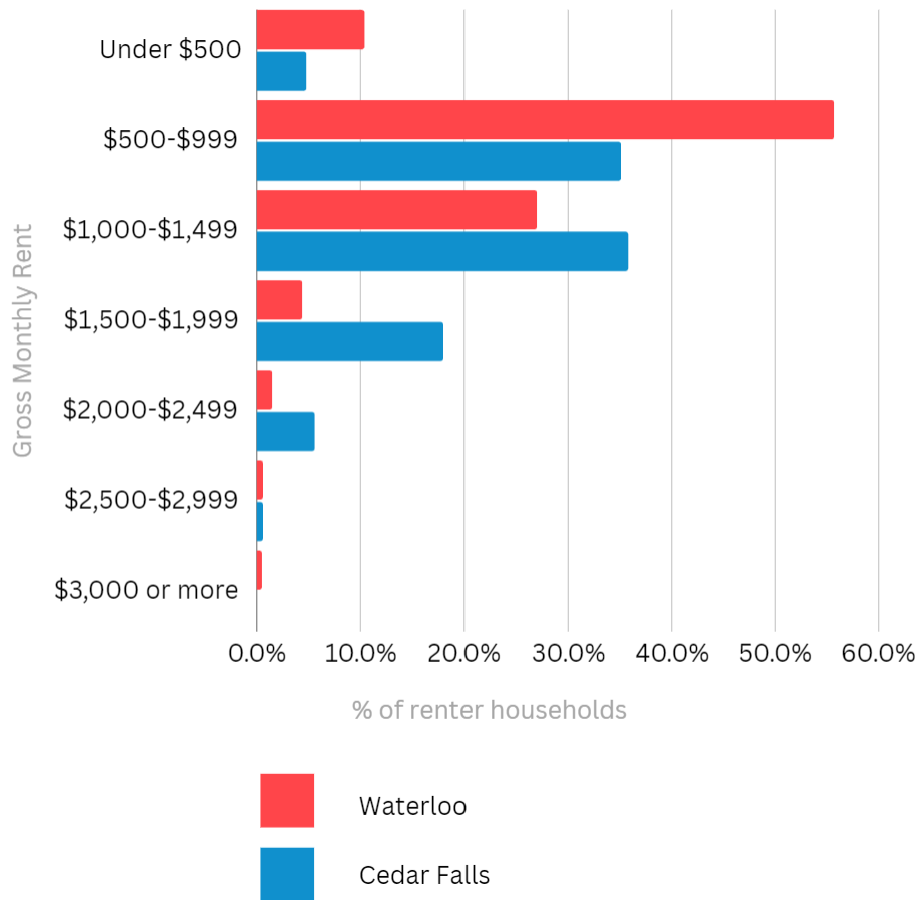
Overall, this data indicates that low incomes make housing at fair market rents unaffordable to individuals earning the minimum wage and, in some cases, the average renter wage in Black Hawk County. Individuals earning average renter wages and working a 40-hour work week are unable to afford a three-bedroom housing unit at fair market rent, which has implications for families of all sizes, but especially larger families and single-parent families.

Housing Cost by Jurisdiction

The U.S. Census Bureau provides estimates of rents and monthly owner costs by jurisdiction. Figures 32 and 33 compare owner and renter costs in Waterloo and Cedar Falls, showing that overall housing costs in Cedar Falls are higher than in Waterloo. Median monthly owner costs were \$1,195 in Waterloo and \$1,683 in Cedar Falls, and median rent was \$865 in Waterloo and \$1,112 in Cedar Falls. This means that, on average, homeowners in Cedar Falls pay 41% more and renters pay 29% more than those in Waterloo.

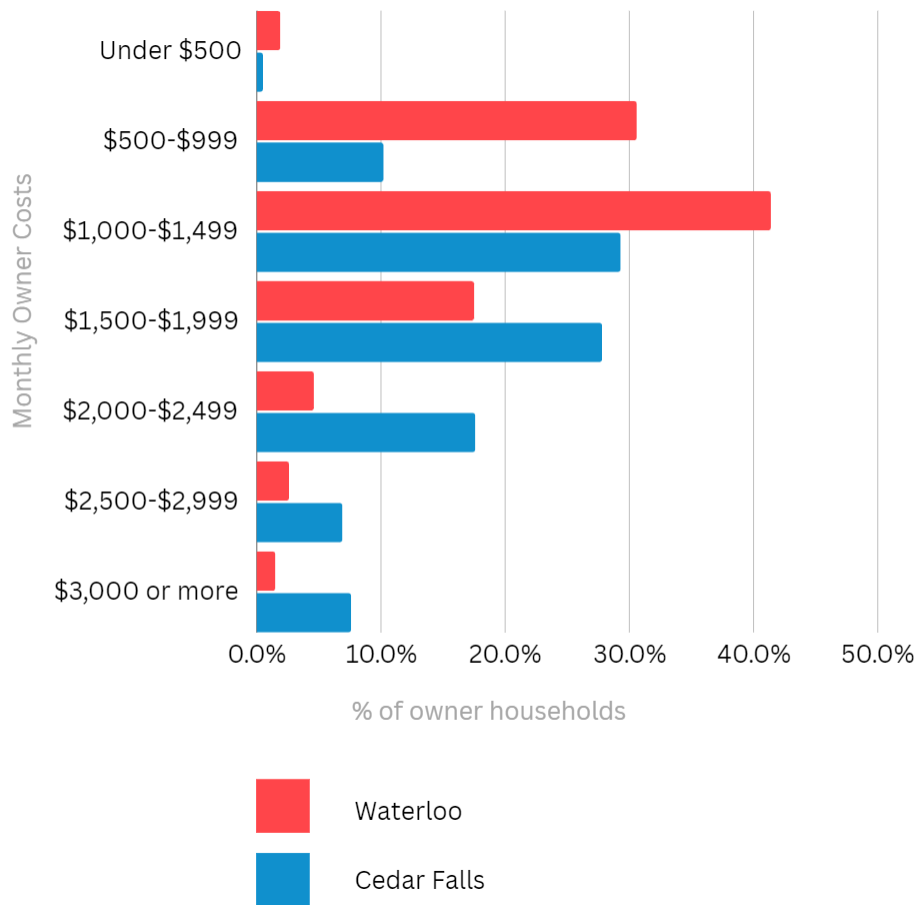
Figures 34 and 35 display median monthly rents and median home values by geography within Waterloo and Cedar Falls. These figures also show that, in general, rents and home values are higher in Cedar Falls than in Waterloo. Rents and home values are generally lowest in central Waterloo and rise towards the edges of the study area, particularly in the west and southwest portions. Notably, there is one census tract in central Waterloo with unusually high rents but without a corresponding increase in home values. This may indicate that this portion of Waterloo has a significant presence of high-cost apartment buildings without many homes available for purchase.

FIGURE 32 – MONTHLY RENTAL COSTS IN THE WATERLOO-CEDAR FALLS HOME CONSORTIUM



Source: 2018-2022 American Community Survey, Table DP04

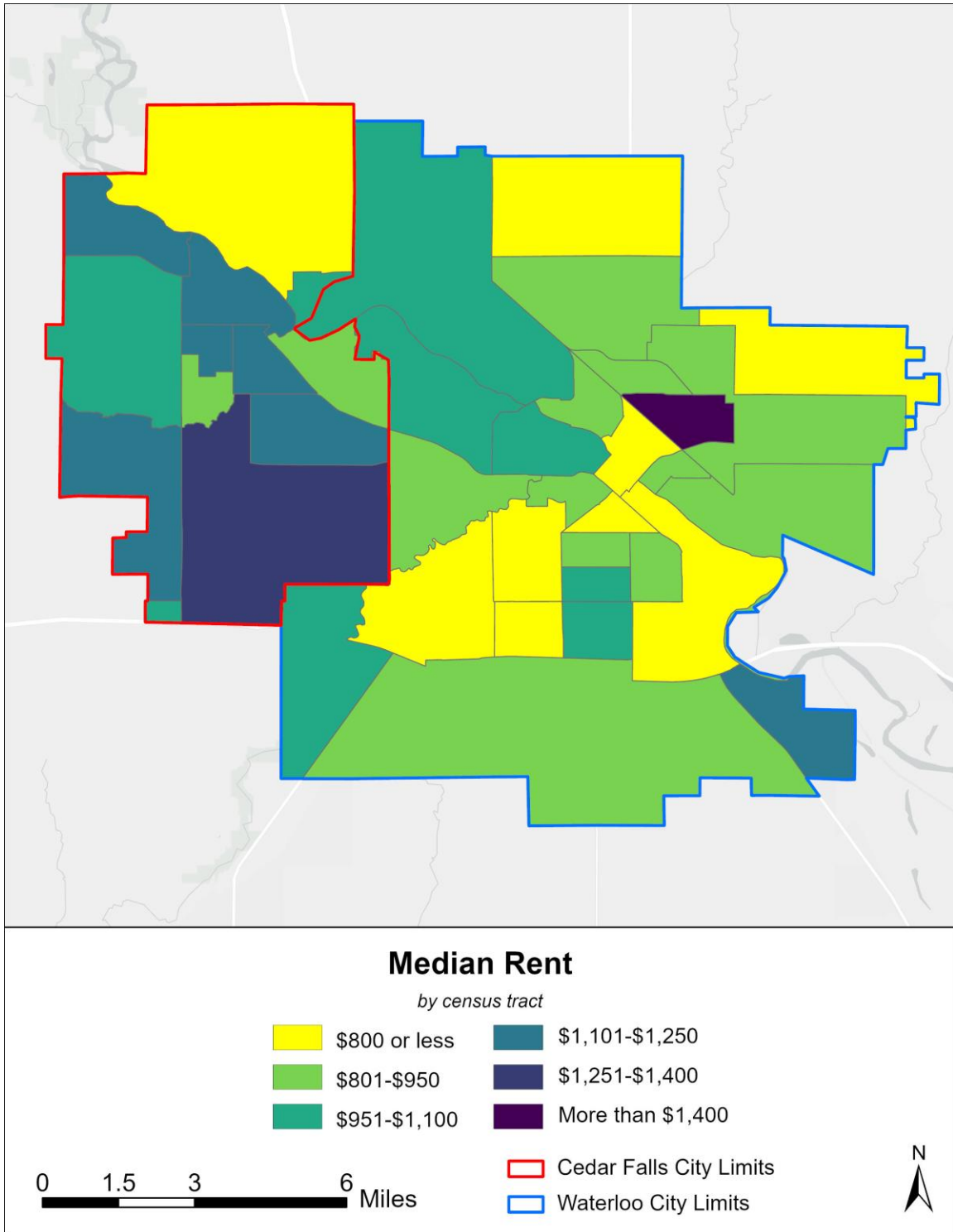
FIGURE 33 – MONTHLY HOMEOWNER COSTS IN THE WATERLOO-CEDAR FALLS HOME CONSORTIUM



Source: 2018-2022 American Community Survey, Table DP04

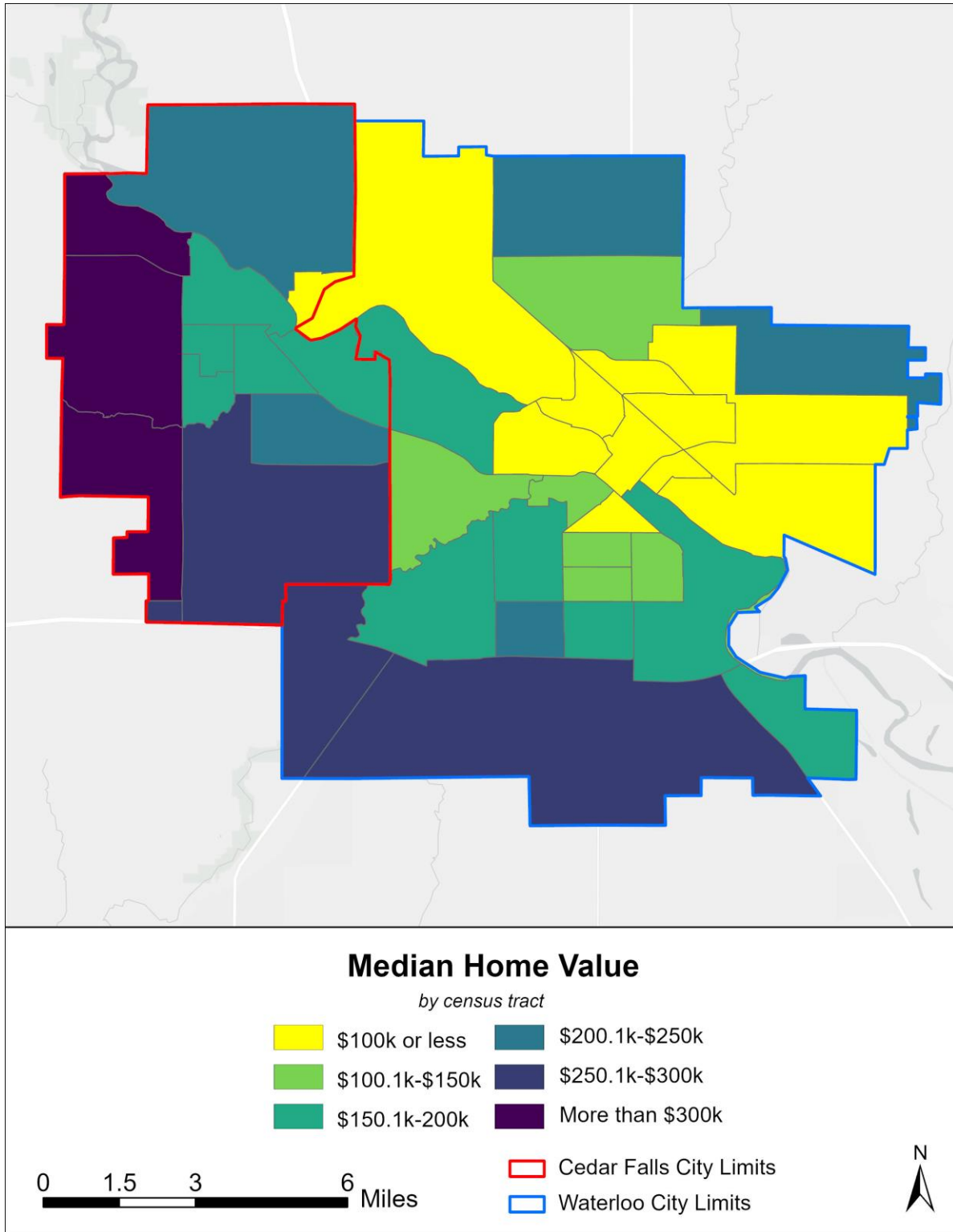
Note: Homeowner costs displayed are for units with a mortgage.

FIGURE 34 – MEDIAN RENT



Source: 2018-2022 American Community Survey, Table DP05

FIGURE 35 – MEDIAN HOME VALUE



Source: 2018-2022 American Community Survey, Table DP05

HOUSING NEEDS

Housing cost and condition are key components to housing choice. Housing barriers may exist in a jurisdiction when some protected class groups have greater difficulty accessing housing in good condition and that they can afford. To assess affordability and other types of housing needs, HUD defines four housing problems:

1. A household is *cost burdened* if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
2. A household is *overcrowded* if there is more than 1.0 people per room, not including kitchen or bathrooms.
3. A housing unit *lacks complete kitchen facilities* if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.
4. A housing unit *lacks complete plumbing facilities* if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly housing income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (also as described above).

To assess housing need, HUD receives a special tabulation of data from the U. S. Census Bureau's American Community Survey (ACS) that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combination of HUD-specified criteria, such as housing needs by race and ethnicity. CHAS data for the Waterloo-Cedar Falls HOME Consortium is shown below in Tables 11-13.

As shown in Table 11, just over 28% of all households in Waterloo and Cedar Falls have at least one housing problem. Although housing problems affect all racial and ethnic groups in HOME Consortium area, some groups experience a disproportionately greater rate of housing need. HUD defines a group as having a disproportionate need if its members experience housing needs at a rate that is ten percentage points or more above that of white households. While housing problems are more prevalent across all races and ethnicities at lower incomes than at higher incomes, non-white households experience higher rates of housing problems than white households at all



In Waterloo and Cedar Falls, households of color are more likely to have a housing need than white households.

In particular, Pacific Islander and Black households of any income level are more likely than households of any other race or ethnicity to have at least one HUD-defined housing problem.

income levels. Tables 12 and 13 show rates of housing problems and severe housing problems by race, ethnicity, and income band up to 100% HAMFI, while Table 11 shows overall likelihood of housing problems by race or ethnicity regardless of income.

Table 12 shows that the subgroups most likely to have a housing problem when accounting for income, race, and ethnicity are Asian and Pacific Islander households with incomes of 30% HAMFI or less, followed by Black households with incomes of 30% HAMFI or less. Table 13 shows that the subgroup most likely to have a severe housing problem is Pacific Islander households with incomes of 30% HAMFI or less, followed by Pacific Islander households with incomes of 81-100% HAMFI and then by Black households with incomes of 30% HAMFI or less. Table 11 shows that, regardless of income, Pacific Islander and Black households are most likely to have at least one housing problem with rates more than double those of white households. Using HUD's disproportionate need definition, Black and Pacific Islander households display disproportionate levels of housing need in Waterloo and Cedar Falls. While not significant enough to be considered disproportionate, Native American households also experience higher-than-average levels of housing need.

TABLE 11 – OVERALL LIKELIHOOD OF HOUSING PROBLEMS BY RACE OR ETHNICITY

Household Demographics	Total Households	# with Housing Problems	% with Housing Problems
Housing Problems			
White, non-Hispanic	35,550	8,755	24.6%
Black, non-Hispanic	4,883	2,569	52.6%
Asian, non-Hispanic	891	263	29.5%
American Indian or Alaska Native, non-Hispanic	128	40	31.3%
Pacific Islander, non-Hispanic	164	90	54.9%
Hispanic, any race	1,710	447	26.1%
Total	43,326	12,164	28.1%

Source: 2016-2020 CHAS Data

TABLE 12 – DEMOGRAPHICS OF HOUSEHOLDS WITH HOUSING PROBLEMS BY INCOME UP TO 100% HAMFI

Household Demographics	Total Households	# with Housing Problems	% with Housing Problems
0-30% HAMFI			
White, non-Hispanic	4,835	3,640	75.3%
Black, non-Hispanic	1,689	1,454	86.1%
Asian, non-Hispanic	84	84	100.0%
American Indian or Alaska Native, non-Hispanic	40	20	50.0%
Pacific Islander, non-Hispanic	50	50	100.0%
Hispanic, any race	360	265	73.6%
Total	7,210	5,655	78.4%
31-50% HAMFI			
White, non-Hispanic	4,825	2,775	57.5%
Black, non-Hispanic	1,045	740	70.8%
Asian, non-Hispanic	53	34	64.2%
American Indian or Alaska Native, non-Hispanic	50	0	0.0%
Pacific Islander, non-Hispanic	35	25	71.4%
Hispanic, any race	144	100	69.4%
Total	6,290	2,775	57.5%
51-80% HAMFI			
White, non-Hispanic	7,155	1,770	24.7%
Black, non-Hispanic	1,145	270	23.6%
Asian, non-Hispanic	159	60	37.7%
American Indian or Alaska Native, non-Hispanic	30	20	66.7%
Pacific Islander, non-Hispanic	60	0	0.0%
Hispanic, any race	429	64	14.9%
Total	9,085	2,210	24.3%
81-100% HAMFI			
White, non-Hispanic	3,710	340	9.2%
Black, non-Hispanic	350	55	15.7%
Asian, non-Hispanic	50	25	50.0%
American Indian or Alaska Native, non-Hispanic	0	0	0.0%
Pacific Islander, non-Hispanic	19	15	78.9%
Hispanic, any race	193	4	2.1%
Total	4,370	445	10.2%

Source: 2016-2020 CHAS Data

TABLE 13 – DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING PROBLEMS BY INCOME UP TO 100% HAMFI

Household Demographics	Total Households	# with Housing Problems	% with Housing Problems
0-30% HAMFI			
White, non-Hispanic	4,835	2,890	59.7%
Black, non-Hispanic	1,689	1,139	67.2%
Asian, non-Hispanic	84	59	66.3%
American Indian or Alaska Native, non-Hispanic	40	0	0.0%
Pacific Islander, non-Hispanic	50	50	100.0%
Hispanic, any race	360	174	48.5%
Total	7,210	4,375	60.6%
31-50% HAMFI			
White, non-Hispanic	4,825	1,075	22.3%
Black, non-Hispanic	1,045	200	19.1%
Asian, non-Hispanic	53	30	55.6%
American Indian or Alaska Native, non-Hispanic	50	0	0.0%
Pacific Islander, non-Hispanic	35	0	0.0%
Hispanic, any race	144	10	6.9%
Total	6,290	1,340	21.3%
51-80% HAMFI			
White, non-Hispanic	7,155	375	5.2%
Black, non-Hispanic	1,145	140	12.3%
Asian, non-Hispanic	159	30	18.8%
American Indian or Alaska Native, non-Hispanic	30	0	0.0%
Pacific Islander, non-Hispanic	60	0	0.0%
Hispanic, any race	429	39	9.1%
Total	9,085	605	6.7%
81-100% HAMFI			
White, non-Hispanic	3,710	100	2.7%
Black, non-Hispanic	350	50	14.3%
Asian, non-Hispanic	50	25	50.0%
American Indian or Alaska Native, non-Hispanic	0	0	0.0%
Pacific Islander, non-Hispanic	19	15	78.9%
Hispanic, any race	193	0	0.0%
Total	4,370	190	4.4%

Source: 2016-2020 CHAS Data

HOMEOWNERSHIP AND LENDING

Homeownership is vital to a community's economic well-being. It allows the opportunity to build wealth, is generally associated with higher levels of civic engagement,²⁸ and is correlated with positive cognitive and behavioral outcomes among children.²⁹

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with continuing impediments to access, have had significant impacts on the homeownership rates of racial and ethnic minorities, particularly Black and Hispanic populations. The gap between the white and Black homeownership rate is the largest among racial and ethnic groups. In 2023, the National Association of Realtors reported that Black homeownership lags 29 percentage points behind white homeownership and has increased only 0.4 percentage points in the past decade³⁰.

Homeownership trends have changed in recent years because of significant events in the housing market and labor force. The homeownership rate for Millennials (the generation born between 1981 and 1997) has historically been lower than for previous generations, controlling for age.³¹ In 2023, Forbes reported that 2022 marked the first year in which more than 50% of Millennials were homeowners; however, rapid increases in housing prices have significantly slowed Millennial homebuying efforts in recent years, as the average income required to purchase a “starter home” nearly doubled between 2020 and 2023³².

Table 14 below shows the number of homeowner and renter households in Waterloo and Cedar Falls, as well as homeownership rates by race and ethnicity. White households in Waterloo had the highest rates of homeownership, followed closely by white households in Cedar Falls. The lowest homeownership rates are found among Native American households in Cedar Falls, followed by Black households in Cedar Falls. Overall homeownership rates are higher in Waterloo than in Cedar Falls, which may be due to lower home values in Waterloo (see Figure 35). In both Waterloo and Cedar Falls, Black households have home ownership rates of less than half of that of white households. One of the most noticeable discrepancies in home ownership rates between the cities is

²⁸ Manturuk K, Lindblad M, Quercia R. “Homeownership and civic engagement in low-income urban neighborhoods: a longitudinal analysis.” *Urban Affairs Review*. 2012;48(5):731–60.

²⁹ Haurin, Donald R. et al. “The Impact of Homeownership on Child Outcomes.” *Low-Income Homeownership Working Paper Series*. Joint Center for Housing Studies of Harvard University. October 2001, <http://www.jchs.harvard.edu/sites/default/files/liho01-14.pdf>.

³⁰ <https://www.nar.realtor/newsroom/more-americans-own-their-homes-but-black-white-homeownership-rate-gap-is-biggest-in-a-decade-nar>

³¹ Choi, Jung et al. “Millennial Homeownership: Why Is It So Low, and How Can We Increase It?” *The Urban Institute*. February 2000. https://www.urban.org/sites/default/files/publication/98729/millennial_homeownership_0.pdf

³² <https://www.forbes.com/advisor/mortgages/real-estate/how-millennial-homeownership-reshaping-market/>

among Hispanic households, who have home ownership rates in Waterloo more than double those in Cedar Falls.

Figure 36 displays home ownership rates by location within Waterloo and Cedar Falls, showing that rates are lowest in central portions of both cities and increase nearer to the perimeters. Waterloo contains both more tracts with low homeownership rates and more tracts with homeownership rates of over 90% than Cedar Falls, likely due to its larger geographic size and larger population.

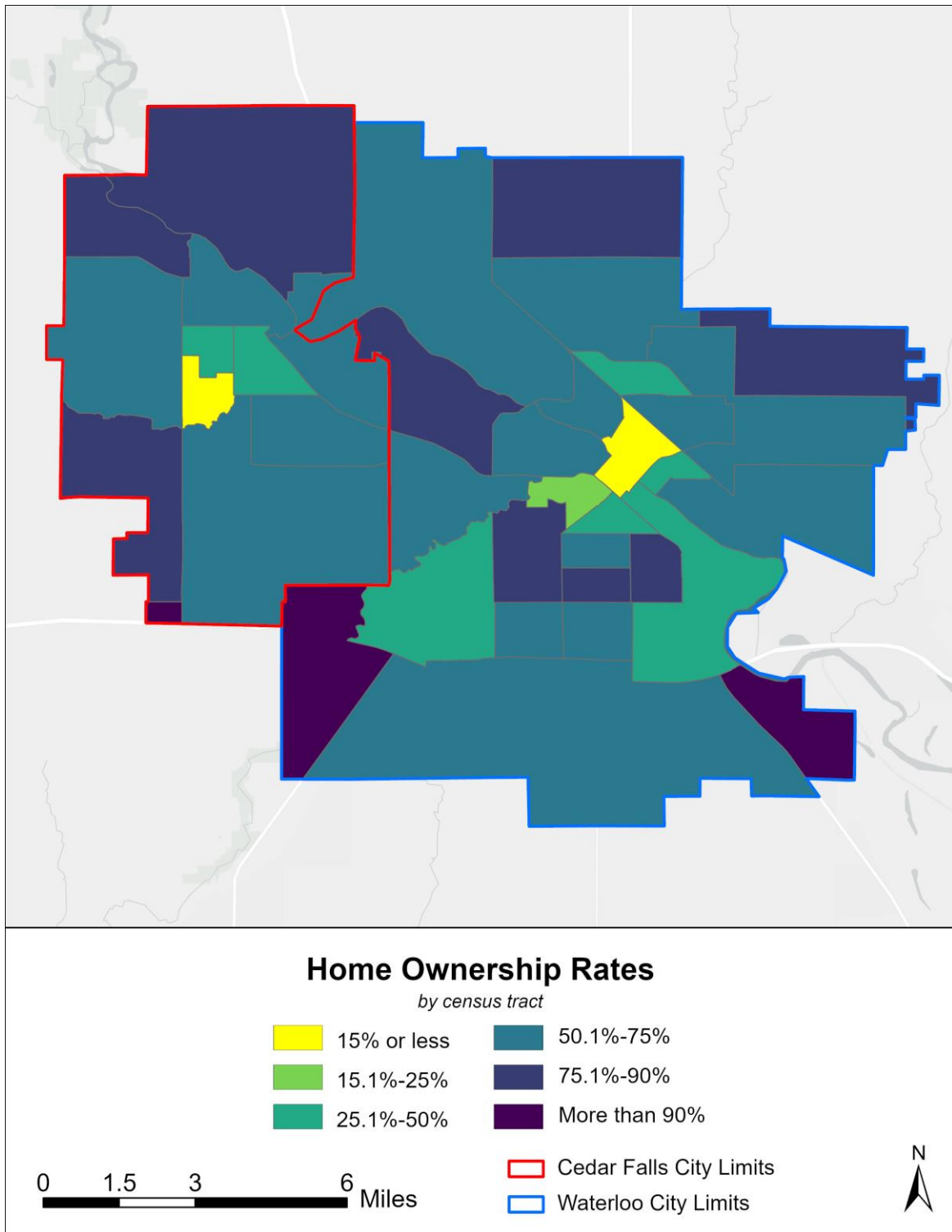
TABLE 14 – HOMEOWNERSHIP AND RENTAL RATES BY RACE AND ETHNICITY

Householder Race/Ethnicity	Waterloo			Cedar Falls		
	Owner Households	Renter Households	Home-ownership Rate	Owner Households	Renter Households	Home-ownership Rate
Non-Hispanic						
White	14463	6,449	69.2%	9,225	5,233	63.8%
Black	1638	3,443	32.2%	35	141	19.9%
Asian	244	290	45.7%	249	189	56.8%
Native American	60	51	54.1%	5	55	8.3%
2+ Races	565	411	57.9%	88	155	36.2%
Other	230	315	42.2%	9	14	39.1%
Hispanic	812	899	47.5%	64	222	22.4%
Total	18,012	11,858	60.3%	9,675	6,009	61.7%

Note: Data presented are number of households, not individuals.

Source: 2018-2022 American Community Survey, Table S2502

FIGURE 36 – SHARE OF HOUSEHOLDS THAT ARE HOMEOWNERS IN THE WATERLOO-CEDAR FALLS HOME CONSORTIUM



Source: 2018-2022 American Community Survey, Table DP05

Mortgage Lending

Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The proceeding data and analysis assesses the degree to which the housing needs of local residents are being met by home loan lenders.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market. HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and information about loan applicants such as sex, race, ethnicity, and income. For the analysis below, the column labeled "Other" represents Native American applicants, whose application numbers tend to be small, concurrent with their share of the population; as well as applicants of other or 2+ races and applicants whose race was not listed.

The source for this analysis is 2022 tract-level HMDA data for census tracts Black Hawk County. Within each record, some data variables are 100% reported: "Loan Type," "Loan Amount," and "Action Taken," for example, but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant declined to identify their sex, race and/or ethnicity. Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. Records where race/ethnicity information was not provided by the applicant in a mail, internet or telephone application have been omitted, as have applications where no applicant income was included, resulting in a total of 1,937 assessed applications.

Table 15 shows the resulting analysis for mortgage application denial rates by race, ethnicity, and income level. Among these categories, the highest denial rates were among low- and mid-income Asian and Pacific Islander residents, followed by high-income Black residents. Notably, while denial rates typically decrease as income increases, high-income Black residents were denied at higher rates than low- and mid-income Black residents; however, as only 13 mid-income and 11 high-income applications by Black residents were recorded, this rate may be skewed due to small sample size.

When disregarding income levels and assessing only by race and ethnicity, Asian and Pacific Islander residents experienced the highest denial rates, followed by residents of other races and then by Black residents. These three categories experienced denial rates more than double those of Hispanic residents. When disregarding race and ethnicity and assessing only by income level, approval rates consistently increase with income.

Initial application rates also vary significantly by race and ethnicity – most notably, Black applicants made up only 4.9% of all assessed applicants despite making up 10% of the population in Black Hawk County. In contrast, Asian and Pacific Islander applicants made

up 3.6% of all assessed applicants, which is double the rate of their 1.8% population share in the County. Hispanic residents also applied for mortgages at rates higher than their population share, comprising 5.7% of applicants and 3.6% of the population. White residents applied at rates slightly lower than their population share, at 74.3% and 82.2% respectively.

Table 16 shows denial reasons provided by race, ethnicity, and income level. The most common denial reason provided was debt-to-income ratio, accounting for nearly 30% of all denials, followed by a poor credit history at 22% and a lack of collateral at 13%. A total of seven applications, or 8% were denied with no reason provided, five of which were from white applicants, one from an Asian or Pacific Islander applicant, and one from a Hispanic applicant. No applications were denied for reasons of mortgage insurance denial, but all other denial reasons were recorded in at least three cases.

TABLE 15 – HOME PURCHASE LOAN APPROVAL RATES IN BLACK HAWK COUNTY BY RACE AND ETHNICITY, 2022

Applicant Income		Applicant Race and Ethnicity					All Applicants
		Non-Latino				Latino/Hispanic	
		White	Black	Asian/PI	Other /NA		
Low Income	Completed Applications	768	71	40	103	77	1,059
	Denial Rate	4.17%	8.45%	12.50%	13.59%	3.90%	5.67%
Middle Income	Completed Applications	323	13	17	51	19	423
	Denial Rate	2.17%	7.69%	11.76%	5.88%	0.00%	3.07%
High Income	Completed Applications	350	11	13	66	15	455
	Denial Rate	1.71%	9.09%	7.69%	3.03%	6.67%	2.42%
All Applicants	Completed Applications	1,441	95	70	220	111	1,937
	Denial Rate	3.12%	8.42%	11.43%	8.64%	3.60%	4.34%

Note: Applications in which no income information was listed were excluded.

Data Source: FFIEC 2022 Home Mortgage Disclosure Act Data, Accessed via <https://ffiec.cfpb.gov/data-browser/data/2022?category=counties&items=19013>

TABLE 16 – HOME PURCHASE LOAN DENIAL REASONS IN BLACK HAWK COUNTY BY RACE AND ETHNICITY, 2022

		Collateral	Credit App. Incomp.	Credit History	Debt-to-Income Ratio	Employment History	Insufficient Cash (Down payment, Closing Costs)	Mortgage Insurance Denied	Other/ No Reason Listed	Unverifiable Information	TOTAL
White	Low income	3	1	6	9	3	2	0	3	6	33
	Middle income	1	1	3	1	0	0	0	1	0	7
	High income	0	2	1	2	0	0	0	1	0	6
Black	Low income	0	0	1	2	0	3	0	0	0	6
	Middle income	0	0	0	1	0	0	0	0	0	1
	High income	0	0	1	0	0	0	0	0	0	1
Asian/PI	Low income	0	0	0	5	0	0	0	0	0	5
	Middle income	0	0	0	1	0	0	0	1	0	2
	High income	1	0	0	0	0	0	0	0	0	1
Other	Low income	0	6	4	4	0	0	0	0	0	14
	Middle income	2	0	0	1	0	0	0	0	0	3
	High income	2	0	2	0	0	0	0	0	0	4
Hispanic	Low income	1	0	1	0	0	0	0	1	0	3
	Middle income	0	0	0	0	0	0	0	0	0	0
	High income	1	0	0	0	0	0	0	0	0	1
TOTAL		11	10	19	26	3	5	0	7	6	87

Note: Applications in which no income information was listed were excluded.

Data Source: FFIEC 2022 Home Mortgage Disclosure Act Data, Accessed via <https://ffiec.cfpb.gov/data-browser/data/2022?category=counties&items=19013>

ZONING, AFFORDABILITY, AND HOUSING CHOICE

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact the entire municipality. "The land use decisions made by a community shape its very character – what it's like to walk through, what it's like to drive through, who lives in it, what kinds of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive one or an ugly one."³³ Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region's potential diversity, growth, and opportunity for all. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing. The following sections will explore how the zoning and land use codes in Waterloo and Cedar Falls impact housing affordability and fair housing choice.

Local Zoning Ordinance Review

The Federal Fair Housing Amendments Act of 1989 prohibits discrimination in housing based on race, color, sex, religion, national origin, disability, and familial status. The Iowa Civil Rights Act (Iowa Code 216) prohibits housing discrimination based on race, color, sex, sexual orientation, gender identity, religion, national origin, mental disability, physical disability, and familial status³⁴. The Fair Housing Act, in particular, takes precedence over local and state laws. Therefore, where conflicts arise between local laws and the Fair Housing Act, those instances will be indicated below. Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include:

- Restrictive forms of land use that exclude any specific form of housing, particularly multi-family housing, or that require large lot sizes or low-density that deter affordable housing development by limiting its economic feasibility;
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit;

³³ John M. Levy. *Contemporary Urban Planning, Eighth Edition*. Upper Saddle River, NJ: Pearson Prentice Hall, 2009.

³⁴ Iowa Civil Rights Commission. *Fair Housing Know Your Rights*. https://icrc.iowa.gov/sites/default/files/publications/2019/IowaCivilRightsCommission_fair%20housing_PRINT_0.pdf

- Placing administrative and siting constraints on group homes for persons with disabilities;
- Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing;
- Restrictions on occupancy of alternative sources of affordable housing such as accessory dwellings, mobile homes, and mixed-use structures.

The treatment of these issues in Waterloo and Cedar Falls is explored in Table 17 below. Because zoning codes present a crucial area of analysis for a study of impediments to fair housing choice, the latest available zoning and land use ordinances of each jurisdiction were reviewed and evaluated against a list of ten common fair housing issues. Taken together, these issues give a picture of (1) the degree to which exclusionary zoning provisions may impact affordable housing opportunities within the jurisdiction and (2) the degree to which the zoning code may impact housing opportunities for persons with disabilities. The zoning ordinances were assigned a risk score of either 1, 2, or 3 for each of the ten issues and was then given an aggregate score calculated by averaging the individual scores, with the possible scores defined as follows:

1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice;

2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;

3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice or is an issue for which the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

The zoning code review presented below is a limited analysis of the codes of the individual members of the Consortium; a comprehensive review of these codes is beyond the scope of this report. As with any zoning measures, the codes of these municipalities likely have fair housing implications or warrant further analysis, as proposed in the recommendations at the conclusion of this report.

The restriction of housing choice for certain historically/socio-economically disadvantaged groups and protected classes can happen in any number of ways and should be viewed on a continuum. The zoning analysis matrix developed for this report and the narrative below are not designed to assert whether each jurisdiction's code creates a per se violation of the FHA or HUD regulations, but are meant as a tool to highlight significant areas where zoning and land use ordinances may otherwise jeopardize the spirit and intent of fair housing protections and HUD's AFFH standards for its entitlement communities.

The issues chosen for discussion show where zoning ordinances and policies could go further to protect fair housing choice for protected and disadvantaged classes, and yet still fulfill the zoning objective of protecting the public's health, safety, and general welfare. Specifically, the issues highlighted by the matrix inform, first, the degree to which

the zoning ordinance may be overly restrictive and exclusionary to the point of artificially limiting the affordable housing inventory and directly contributing to higher housing and rental costs. And secondly, the matrix helps inform the impact the local regulations may have on housing opportunities for persons with disabilities, a protected class under state and federal fair housing law. The following chart lists the ten issues reviewed and the scores for each issue.

TABLE 17 – ZONING CODE RISK SCORES

	Waterloo	Cedar Falls
Issue	Score	Score
1a. Does the jurisdiction's definition of "family" have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?	1	1
1b. Does the definition of "family" discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?		
2a. Does the zoning code treat housing for individuals with disabilities (e.g., group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?	2	1
2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?		
3a. Do the jurisdiction's policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements?	1	1
3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?		
4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?	2	2
5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?	3	3

6a. Does the jurisdiction's zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?	2	2
7. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single-family dwelling districts?	1	1
7b. Do multi-family districts restrict development only to low-density housing types?		
8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?	1	1
9a. Are the jurisdiction's design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act's accessibility standards for design and construction?	2	2
9b. Is there any provision for monitoring compliance?		
10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?	2	2
Average Risk Score	1.7	1.6

In Table 17 above, the City of Cedar Falls had the lowest zoning code risk score of the two jurisdictions (1.6). Waterloo had a slightly higher zoning code risk score of 1.7.

Questions 1a and 1b in the table inquire about each jurisdiction's definition of family. The City of Waterloo defines "family" as one or more persons occupying a single dwelling unit, provided that all members are related by blood, marriage, or adoption. Additionally, no such family can contain over four persons. However, there is an exception for children under foster care or exchange students. The City of Cedar Falls also has a somewhat restrictive definition for "family" to include only members of a household that are related by blood, marriage, or adoption; and not more than four cohabitants not so related.³⁵ Between the two jurisdictions, Waterloo has the more permissive definition of "family," which includes related as well as some limited inclusions of unrelated individuals. However, Cedar Falls allows for some larger-sized households of unrelated individuals, namely small group homes (up to 9 individuals living together), to exist in single-family, residential districts, essentially allowing them to bypass the city's otherwise restrictive definition of family. Zoning codes commonly define family to include individuals with relationships based on consanguinity or

³⁵ The City of Cedar Falls. Code of Ordinances, February 2024. Retrieved from https://library.municode.com/ia/cedar_falls/codes/code_of_ordinances?nodeId=10264

marriage, i.e., parents and children, or married couples and their in-laws. Zoning codes also tend to define “unrelated” or “functional” families that go beyond the traditional family structure. Historically, municipalities have imposed more restrictions on functional/unrelated families as a way to control density, traffic, and character of a neighborhood³⁶. While Cedar Falls and Waterloo contain restrictive definitions of family in their zoning code, city staff indicates that neither city regulates nor permits occupancy based on these definitions.

Definitions of “family” and “household” impact how each jurisdiction treats persons with disabilities living together in group homes, as discussed in Questions 2a and 2b. The Departments of Justice and Housing and Urban Development have jointly established that persons with disabilities must be allowed to live together in single-family districts, even if they live in group homes. Any definition of “family” or “household” that permits unrelated individuals to live together but subjects group homes of the same size to a more rigorous review process or prohibits group homes altogether is facially discriminatory.³⁷ Cedar Falls allows group homes for up to 9 residents by right in both single family and multi-family residential districts. However, a group home serving 9 or more unrelated residents exceeds the number of unrelated individuals meeting the City’s definition of “family” and therefore does not establish a stricter standard than for unrelated persons living together without disabilities. City staff from Cedar Falls report that, while the zoning code may impose restrictions on unit occupancy, group homes are considered the same as any other residential household. The City of Waterloo’s zoning ordinance does not specify restrictions on the total number of people allowed to live in group homes, however, it does allow individuals who are not related by blood, law, or adoption to still live in the same dwelling unit³⁸. Any additional restrictions on housing for persons with disabilities may have the effect of limiting fair housing choice for this protected class. Particularly, in Waterloo, while individuals in a group home are not required to be related to each other, group homes are not allowed in single-family districts and are restricted to R-3 multiple residence districts.³⁹

Questions 3a and 3b inquire about each jurisdiction’s reasonable modification or accommodation processes to improve housing accessibility for persons with disabilities. While the City of Cedar Falls exempts some common accessibility features from yard requirements, neither of the two jurisdictions currently has a comprehensive reasonable accommodation process codified in their zoning ordinance. Most jurisdictions do give some discretion to staff to allow minor encroachments into the setback, which could allow applicants adding exterior modifications to complete an administrative process,

³⁶ Cornell Law Faculty Publications, “Zoning for Families”. Retrieved from:

<https://scholarship.law.cornell.edu/cgi/viewcontent.cgi?article=2823&context=facpub>

³⁷ Department of Justice and the Department of Housing and Urban Development. (November 2016) “State and Local Land Use Laws and Practices and the Application of the Fair Housing Act,” p.7-8.

<https://www.justice.gov/crt/page/file/909956/download>

³⁸ https://cms6.revize.com/revize/waterloo/document_center/Planning/Zoning%20Ord%205079%2009-04-18.pdf . (page 12).

³⁹ https://cms6.revize.com/revize/waterloo/document_center/Planning/Zoning%20Ord%205079%2009-04-18.pdf . (page 49).

rather than enduring the variance process. The Fair Housing Act does not require jurisdictions to adopt reasonable accommodation processes, but strongly encourages this practice for the benefit of local government staff and the public.⁴⁰ City staff from Cedar Falls indicated that an accommodations process currently exists for residents who request it, however publishing or codifying the process could increase transparency and better ensure it is applied evenly.

Question 4 addresses spacing requirements on group homes, which are considered protected housing types. Cedar Falls considers group homes (less than 9 individuals) to be equal to single-family households and are thus allowed in single-unit residential districts. Further, Cedar Falls defines group homes as per Iowa state law which defines group homes as including “elder family homes, elder group homes, and family care homes. Large group care facilities that provide housing for nine or more individuals are considered Group Living Uses.” However, group homes are not allowed in single family residential districts in Waterloo, they are restricted to R-3 multiple residence districts.

Question 5 explores each jurisdiction's zoning requirements for residential substance abuse treatment facilities. Persons in recovery from alcohol or substance abuse are considered persons with disabilities under the Fair Housing Act.⁴¹ The Act therefore requires housing for persons in recovery to be treated in the same manner as other persons with disabilities. Cedar Falls omits any reference to housing for persons in recovery. This omission is compounded by additional ordinances, such as Section 26-141 in Cedar Fall's ordinance which defines treatment facilities as any health care facility providing either or both inpatient or outpatient therapy for substance abuse, mental illness, or other behavioral problems. Health care facilities are limited to districts for civic and institutional use. Therefore, the omission of this type as a permitted use in any residential district has the effect of prohibiting this use. In Waterloo, group homes are allowed in multiple residence districts and is further defined to include substance abuse facilities and juvenile centers. However, Waterloo's ordinance further states that these facilities and centers may not include a bed and breakfast, boarding or lodging house, rooming house, or halfway (rehabilitation) house, as such terms may be defined in this Ordinance⁴².

Academic and market research have proven what also is intuitive: land use regulations can directly limit the supply of housing units within a given jurisdiction, and thus contribute to making housing more expensive, i.e. less affordable.⁴³ Exclusionary zoning is

⁴⁰ *Ibid.*, p. 17

⁴¹ *Ibid.*, p. 7

⁴² https://cms6.revize.com/revize/waterloo/document_center/Planning/Zoning%20Ord%205079%2009-04-18.pdf. (Page 12).

⁴³ Gyourko, Joseph, Albert Saiz, and Anita A. Summers (2007) “A New Measure of the Local Regulatory Environment for Housing Markets: The Wharton Residential Land Use Regulatory Index,” real.wharton.upenn.edu; Randal O’Toole. (2006) “The Planning Penalty: How Smart Growth Makes Housing Unaffordable,” at independent.org/pdf/policy_reports/2006-04-03-housing.pdf; Edward L. Glaeser and

understood to mean zoning regulations which impose unreasonable residential design regulations that are not congruent with the actual standards necessary to protect the health and safety of current average household sizes and prevent overcrowding. Zoning policies that impose barriers to housing development by making developable land and construction costlier than they are inherently can take different forms and may include: high minimum lot sizes, low density allowances, wide street frontages, large setbacks, low floor area ratios, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, low maximum building heights, restrictions against infill development, restrictions on the types of housing that may be constructed in certain residential zones, arbitrary or antiquated historic preservation standards, minimum off-street parking requirements, restrictions against residential conversions to multi-unit buildings, lengthy permitting processes, development impact fees, and/or restrictions on accessory dwelling units.

The Brookings Institution has found that “on roughly 75% of land in most cities today, it is illegal to build anything except single-family detached houses. The origins of single-family zoning in America are not benign: Many housing codes used density as a proxy for separating people by income and race.”⁴⁴ Although today it may be difficult to prove that a zoning ordinance’s preference for single family zoning is facially (or intentionally) discriminatory in direct violation of fair housing laws, such land use regulations still may have the effect of artificially limiting the supply of housing units in a given area and disproportionately reducing housing choice for moderate to low-income families, minorities, persons with disabilities on fixed incomes, families with children, and other protected classes by making the development of affordable housing cost prohibitive. Legitimate public objectives, such as maintaining the residential character of established neighborhoods, environmental protection, or public health, must be balanced with housing needs and availability.

Looking at other regulatory barriers, Questions 6 and 7 inquire about exclusionary zoning tactics impose unreasonable design regulations or preclude the development of housing types that serve a variety of protected classes. Cedar Falls allows multifamily residential uses by right in several residential districts. Looking specifically at multifamily zoning districts, Cedar Falls has permissive setbacks, lot sizes and building minimums as long as the design standards meet the neighborhood medium frontage which is intended to fit comfortably into an existing neighborhood context that still allows for a slightly increased scale and intensity. Both Waterloo and Cedar Falls provide for zoning districts where low, medium, and high-density residential uses are permitted. In Waterloo, the R-3 multiple residence district allows for one- and two-family residential uses, multiple/condominium/row dwellings, group homes, mobile home parks, and alterations and conversions of single family/two family/multiple family dwellings into two

Joseph Gyourko. (2002) “The Impact of Zoning on Housing Affordability,” law.yale.edu/system/files/documents/pdf/hier1948.pdf; The White House’s Housing Development Toolkit, 2016, available at whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf.

⁴⁴ Baca, Alex. (December 4, 2019) “Gentle” Density Can Save Our Neighborhoods,” <https://www.brookings.edu/research/gentle-density-can-save-our-neighborhoods>.

family/multiple family dwellings, boarding and lodging houses, rooming houses, or bed and breakfasts. These conversions will only be allowed in accordance with the lot area and frontage and yard requirements. The R-4 multiple residence district permits any uses from the R-2 and R-3 districts in addition to professional offices⁴⁵.

Another way to improve access to housing for protected classes is through the provision of alternative housing types, such as accessory dwelling units and mobile/manufactured homes. These housing types are observed in Question 8. Cedar Falls permits the use of accessory dwelling units for owner-occupied attached and detached single-unit dwellings. However, both Cedar Falls and Waterloo have several restrictions on the use of mobile homes and mobile home parks. Waterloo only allows mobile homes in mobile home parks. Waterloo makes one exception in that "one (1) mobile home may be placed on a farm eighty (80) acres or larger in addition to an existing permanent dwelling provided that occupant of said mobile home is active in the conduct of agricultural operation of said farm⁴⁶".

Questions 9 and 10 complete the regulatory review, inquiring about building codes and inclusionary zoning policies. Cedar Falls uses the 2015 International Building Code, while Waterloo utilizes the 2021 International Building Code. Both building codes are compliant with the Fair Housing Act. Monitoring compliance with these codes is not required but is a good practice for ensuring safe and accessible housing products. Lastly, Waterloo and Cedar Falls do not currently have any inclusionary zoning incentives or provisions listed in the zoning code. Targeted planned developments would benefit from reduced minimum lot areas, lot widths, lot depths, and setbacks, as well as increased height allowances and modifications to the city's landscaping and off-street parking restrictions.

Local Fair Housing Ordinances

Both jurisdictions have adopted fair housing ordinances or ordinances on unlawful housing practices, which prohibit housing discrimination practices within the jurisdiction (see Waterloo Article A. Fair Housing; Cedar Falls Article I. Human Rights Commission).

The City of Waterloo's ordinance prohibits the following activities explicitly⁴⁷:

A. To refuse to sell, rent, lease, assign, sublease, refuse to negotiate, or to otherwise make unavailable, or deny any real property or dwelling or part, portion or interest therein, to any person because of the race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status of such person.

B. To discriminate against any person because of the person's race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status, in the terms, conditions or privileges of the sale, rental, lease, assignment or sublease of any real property or dwelling or any part, portion or interest in the real property or

⁴⁵ https://cms6.revize.com/revize/waterloo/document_center/Planning/Zoning%20Ord%205079%2009-04-18.pdf. (Pages 45-53)

⁴⁶ https://cms6.revize.com/revize/waterloo/document_center/Planning/Zoning%20Ord%205079%2009-04-18.pdf. (Page 154).

⁴⁷ https://codelibrary.amlegal.com/codes/waterlooia/latest/waterloo_ia/0-0-0-3838

dwelling, or in the provision of services or facilities in connection with the real property or dwelling.

C. To directly or indirectly advertise, or in any other manner indicate or publicize that the purchase, rental, lease, assignment, or sublease of any real property or dwelling or any part, portion or interest therein, by persons of any particular race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status is unwelcome, objectionable, not acceptable, or not solicited.

D. To discriminate against the lessee or purchaser of any real property or dwelling or part, portion or interest of the real property or dwelling, or against any prospective lessee or purchaser of the property or dwelling, because of the race, color, creed, religion, sex, sexual orientation, gender identity, disability, age or national origin of persons who may from time to time be present in or on the lessee's or owner's premises for lawful purposes at the invitation of the lessee or owner as friends, guests, visitors, relatives or in any similar capacity.

E. To induce or attempt to induce a person to sell or rent a dwelling by representations regarding the entry or prospective entry into a neighborhood of a person of a particular race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status.

F. To represent to any person of a particular race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status that a dwelling is not available for inspection, sale, or rental when the dwelling is available for inspection, sale, or rental. (Ord. 4891, 11-13-2007)

G. To discriminate in the sale or rental, or otherwise make unavailable or deny a dwelling, to a buyer or renter because of a disability of:

1. That buyer or renter;
2. A person residing in or intending to reside in that dwelling after it is sold, rented, or made available; or
3. A person associated with that buyer or renter.

H. To discriminate against another person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection with the dwelling, because of a disability of:

1. That person;
2. A person residing in or intending to reside in that dwelling after it is sold, rented, or made available; or
3. A person associated with that person.

I. To refuse to permit, at the expense of the person with a disability, reasonable modifications of existing premises occupied or to be occupied by the person if the modifications are necessary to afford the person full enjoyment of the premises. In the case of a rental, a landlord may, where reasonable to do so, condition permission for a modification on the renter's agreement to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear excepted.

J. To refuse to make reasonable accommodations in rules, policies, practices, or services when the accommodations are necessary to afford the person with a disability equal opportunity to use and enjoy a dwelling.

K. In connection with the design and construction of covered multi-family dwellings for first occupancy after March 13, 1991, to fail to design and construct those dwellings in a manner that meets the following requirements:

1. The public use and common use portions of the dwellings are readily accessible to and usable by persons with disabilities.

2. All doors designed to allow passage into and within all premises within the dwellings are sufficiently wide to allow passage by persons in wheelchairs.

3. All premises within the dwellings contain the following features of adaptive design:

a. An accessible route into and through the dwelling;

b. Light switches, electrical outlets, thermostats, and other environmental controls in accessible locations;

c. Reinforcements in bathroom walls to allow later installation of grab bars; and

d. Usable kitchens and bathrooms such that a person in a wheelchair can maneuver about the space.

The City of Cedar Falls has established a Human Rights Commission in conformance with the Iowa Civil Rights Act, "to declare a public policy of nondiscrimination in the city, to cooperate in the claims process with the Iowa Civil Rights Commission and to provide for educational programs to prevent and eliminate discrimination in the city," (See Section 12-1).

The Commission's duties include the following:

(1) Provide intake assistance for complaints from individuals who may be victims of discrimination and refer such complaints to the Iowa Civil Rights Commission for investigation and adjudication.

(2) Investigate and study the existence, character, causes, extent, and effects of discrimination in public accommodations, employment, apprenticeship programs, on-the-job training programs, educational curricula programs and housing in this city, and to attempt to eliminate such discrimination by education.

(3) Promote equal opportunity in all areas of city government. The commission shall request and obtain such cooperation, assistance and data from city departments as may be reasonably necessary to carry out its work.

(4) Formulate and carry out an educational program designed to prevent and eliminate discrimination.

(5) Adopt such rules and regulations as may be necessary to govern, expedite and effectuate the provisions of this article.

(6) Render to the city council, not less than once a year, a written report of its activities and recommendations.

(7) Cooperate with federal, state, regional, county and city agencies, citizens, citizen organizations, the board of education and private schools in formulating and developing courses of education to accomplish the objectives of this article.

In carrying out its duties under this article the commission shall further the city's public policy of nondiscrimination in the city on the basis of race, age, creed, color, sex, national origin, religion, ancestry, disability, familial status, sexual orientation, or gender identity.

(Ord. No. 2977, § 1, 1-4-2021)

Neither Waterloo nor Cedar Falls identify how these ordinances are administered or enforced in their given sections. However, county or state ordinances provide more robust response to fair housing complaints. For example, the Iowa Civil Rights Commission receives, investigates, and resolves complaints regarding discrimination in the areas of employment, housing, public accommodations, credit, and education⁴⁸.

Nuisance Ordinances

A 2017 lawsuit filed against the City of Maplewood, MO alleged that Maplewood used its nuisance ordinance to penalize residents for making multiple police calls. In the lawsuit, a former Maplewood resident stated that her occupancy permit, which allowed her to live in the city, was revoked after she made four calls to the police between September 2011 and February 2012. The plaintiff's calls were distress calls made in response to domestic abuse perpetrated by her boyfriend. An ACLU article reported that city officials were aware of the repeated domestic abuse but chose to revoke her occupancy permit for 180 days, forcing her to leave the city. In 2018, the city of Maplewood settled with the plaintiff and changed its nuisance laws to exclude any persons calling the law enforcement as victims of a crime.⁴⁹

Nuisance ordinances in Waterloo and Cedar Falls are not generally as punitive as those in Maplewood. Cedar Falls' nuisance ordinance (see Chapter 15, Article I.) defines certain acts and conditions declared as nuisances as "whatever is injurious to the senses or an obstruction to the free use of property so as essentially to interfere with the comfortable enjoyment of life or property by the public or community". Waterloo's nuisance ordinance (see Chapter 2 sections 4-2-1 through 4-2-6), includes general property maintenance issues, corruption, or obstruction of natural bodies of water, obstruction of public roads/streets, etc. On the whole, public nuisances identified by the local ordinances cover common property maintenance issues.

⁴⁸ Iowa Civil Rights Commission. Fair Housing Know Your Rights. Retrieved from https://icrc.iowa.gov/sites/default/files/publications/2019/IowaCivilRightsCommission_fair%20housing_PRINT_0.pdf

⁴⁹ ACLU. (April 10, 2017) "Rosetta Watson v. Maplewood." <https://www.aclu.org/cases/rosetta-watson-v-maplewood>

CHAPTER 7.

PUBLICLY

SUPPORTED HOUSING

Publicly supported housing encompasses several strategies and programs developed since the 1930s by the federal government to ameliorate housing hardships that exist in neighborhoods throughout the country. The introduction and mass implementation of slum clearance to construct public housing projects during the mid-1900s signified the beginning of publicly supported housing programs. Government-owned and managed public housing was an attempt to alleviate problems found in low-income neighborhoods such as overcrowding, substandard housing, and unsanitary conditions. Once thought of as a solution, the intense concentration of poverty in public housing projects often exacerbated negative conditions that would have lasting and profound impact on their communities.

Improving on public housing's model of high-density, fixed-site dwellings for very low-income households, publicly supported housing programs have since evolved into a more multi-faceted approach overseen by local housing agencies. The Housing and Community Development Act of 1974 created Section 8 rental assistance programs. Section 8, now referred to as the Housing Choice Voucher (HCV) program, provides two types of housing vouchers to subsidize rent for low-income households: project-based and tenant-based. Project-based vouchers can be applied to fixed housing units in scattered site locations while tenant-based vouchers allow recipients the opportunity to find and help pay for available rental housing on the private market.

The Tax Reform Act of 1986 created the Low-Income Housing Tax Credit (LIHTC) program to incentivize development of affordable, rental-housing development. Funds are distributed to state housing finance agencies that award tax credits to qualified projects to subsidize development costs. Other HUD Programs including Section 811 and Section 202 also provide funding to develop multifamily rental housing specifically for disabled and elderly populations.

The now-defunct HOPE VI program was introduced in the early 1990s to revitalize and rebuild dilapidated public housing projects and create mixed-income communities. Although HOPE VI achieved some important successes, the Choice Neighborhoods Initiative program was developed to improve on the lessons learned from HOPE VI. The

scope of Choice Neighborhoods spans beyond housing and addresses employment access, education quality, public safety, health, and recreation.⁵⁰

Current publicly supported housing programs signify a general shift in ideology toward more comprehensive community investment and de-concentration of poverty. However, studies have shown a tendency for subsidized low-income housing developments and residents utilizing housing vouchers to continue to cluster in disadvantaged, low-income neighborhoods. Programmatic rules and the point allocation systems for LIHTC are thought to play a role in this clustering and recent years have seen many states revising their allocation formulas to discourage this pattern in new developments.⁵¹ The reasons for clustering of HCVs is more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering.⁵² This section will review the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution across the region.

SUPPLY AND OCCUPANCY

Low-income residents in the consortium receive publicly supported housing assistance from the Housing Authorities of Waterloo and Cedar Falls. Together, these authorities manage a total of 1,415 Housing Choice Vouchers, 912 Project-Based Section 8 units, and 50 Public Housing units, as shown in Table 18. The consortium does not have any Section 202 or Section 811 units.

⁵⁰ Department of Housing and Urban Development. *Evidence Matters: Transforming Knowledge Into Housing and Community Development Policy*. 2011. www.huduser.gov/portal/periodicals/em/EM-newsletter_FNL_web.pdf.

⁵¹ Dawkins, Casey J. *Exploring the Spatial Distribution of Low Income Housing Tax Credit Properties*. US Department of Housing and Urban Development, www.huduser.gov/publications/pdf/dawkins_exploringliht_assistedhousingrcr04.pdf.

⁵² Galvez, Martha M. *What Do We Know About Housing Choice Voucher Program Location Outcomes? A Review of Recent Literature*. What Works Collaborative, 2010. www.urban.org/sites/default/files/publication/29176/412218-What-Do-We-Know-About-Housing-Choice-Voucher-Program-Location-Outcomes-.PDF.

TABLE 18 – UNITS BY PUBLIC HOUSING AUTHORITY

Housing Units	Public Housing Units	Housing Choice Vouchers	Project-Based Section 8 Units
Housing Authority of Waterloo	50	1,091	721
Housing Authority of Cedar Falls	0	324	191
TOTAL	50	1,415	912

Source: APSH 2023 data

Table 19 shows the residents of publicly supported housing in the three counties by race and ethnicity. White residents make up the largest overall share of publicly supported housing residents, accounting for about 53% of residents across all three categories. White residents also comprise the primary demographic within the individual Public Housing and Project-Based Section 8 categories, while Black residents comprise the primary demographic within the Housing Choice Voucher program and the second largest demographic group within each of the other two categories. Overall, Black residents make up nearly 45% of publicly supported housing residents despite accounting for just 12% of the consortium's overall population as of the 2020 Census, indicating a disproportionate need for this group.

TABLE 19 – RACE AND ETHNICITY OF PUBLICLY SUPPORTED HOUSING RESIDENTS BY PROGRAM CATEGORY IN THE WATERLOO-CEDAR FALLS HOME CONSORTIUM

Race/Ethnicity	Public Housing		HCV Program		Project-Based Section 8	
	# of residents	% of residents	# of residents	% of residents	# of residents	% of residents
White	45	90.0%	490	40.6%	496	71.7%
Black/African American	5	10.0%	684	56.7%	185	26.7%
Asian/Pacific Islander	0	0.0%	2	0.2%	N/A	N/A
American Indian/Alaska Native	0	0.0%	2	0.2%	N/A	N/A
Other	0	0.0%	0	0.0%	N/A	N/A
Hispanic/Latino	0	0.0%	28	2.3%	11	1.6%
TOTAL	50	100.0%	1,206	100.0%	692	100.0%

Note: Data presented are number of households, not individuals

Source: 2023 APSH data

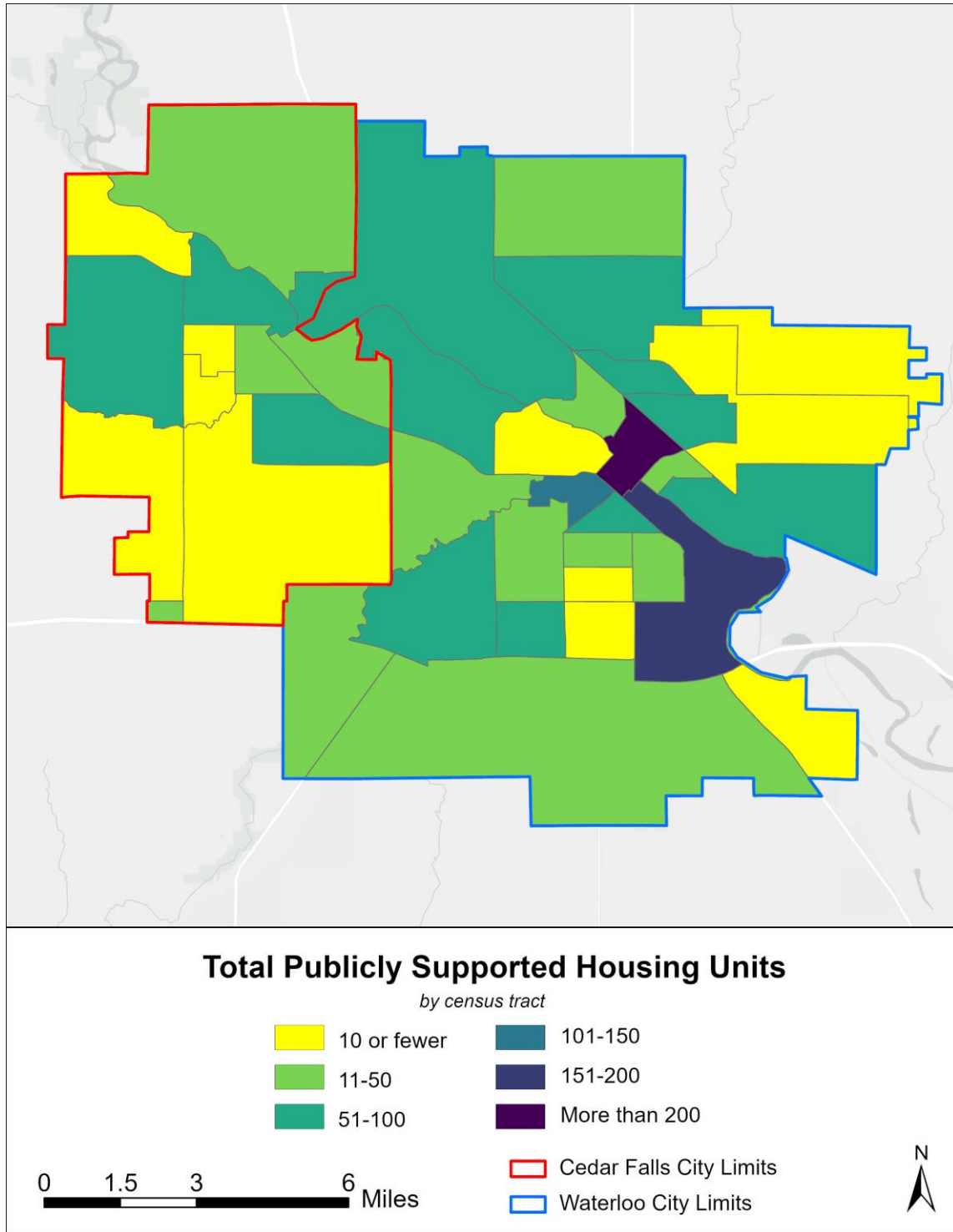
GEOGRAPHY OF SUPPORTED HOUSING

Figures 37-39 depict the locations of different types of publicly supported housing in Waterloo and Cedar Falls (note: census tracts with no recorded publicly supported housing units of a given type will appear blank). Publicly supported housing of all types, as depicted in Figure 37, is most prevalent in central and northern Waterloo, as well as portions of central Cedar Falls, and least prevalent in southern Cedar Falls and portions of eastern and southern Waterloo.

Figure 38 depicts the locations and concentrations of Housing Choice Vouchers in use within the consortium. By their nature Housing Choice Vouchers are intended to be the most widely distributed form of publicly supported housing, as they are intended to allow recipients to select their own housing in their preferred neighborhood from any landlord who accepts vouchers from the HCV program. Housing Choice Vouchers are more prevalent in Waterloo than in Cedar Falls, with Waterloo having the only three tracts to have more than 100 HCV holders each. In contrast, Waterloo has one tract with no HCV holders and four tracts with 10 or fewer HCV holders, while Cedar Falls has two tracts with no holders and two tracts with 10 or fewer holders. Overall, HCV holders are most concentrated in the central and eastern portions of Waterloo.

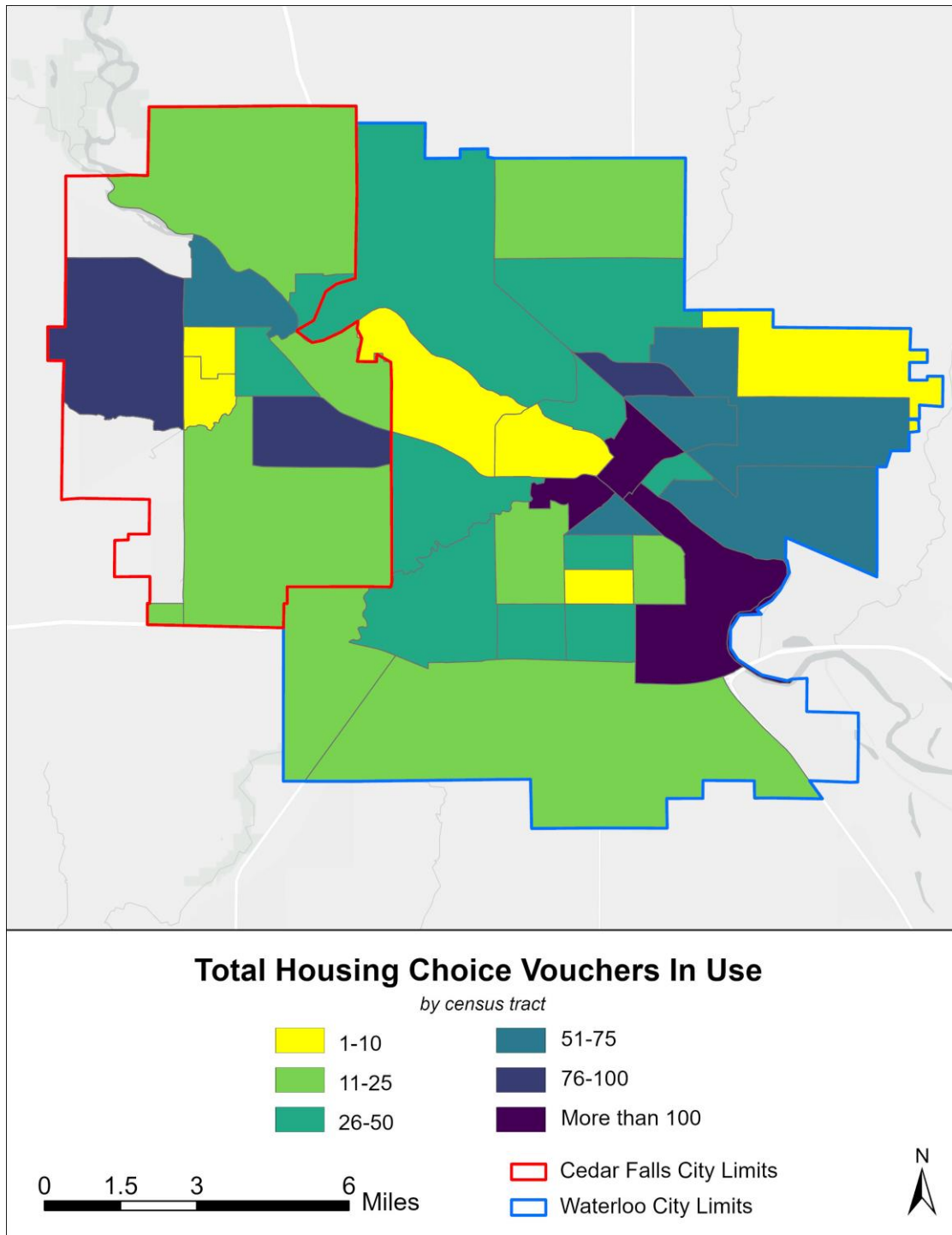
Figure 39 depicts the locations and concentrations of Project-Based Section 8 units in the consortium, which are significantly less widespread than Housing Choice Vouchers. Project-Based Section 8 units are most concentrated in areas of central and northeastern Waterloo and two census tracts in central Cedar Falls and are completely absent from some areas in northern Cedar Falls and southern, eastern, and northern Waterloo. Waterloo contains the only census tracts to have more than 100 Project-Based Section 8 units.

FIGURE 37 – DISTRIBUTION OF ALL PUBLICLY SUPPORTED HOUSING TYPES IN THE WATERLOO-CEDAR FALLS HOME CONSORTIUM



Source: APSH data, 2023

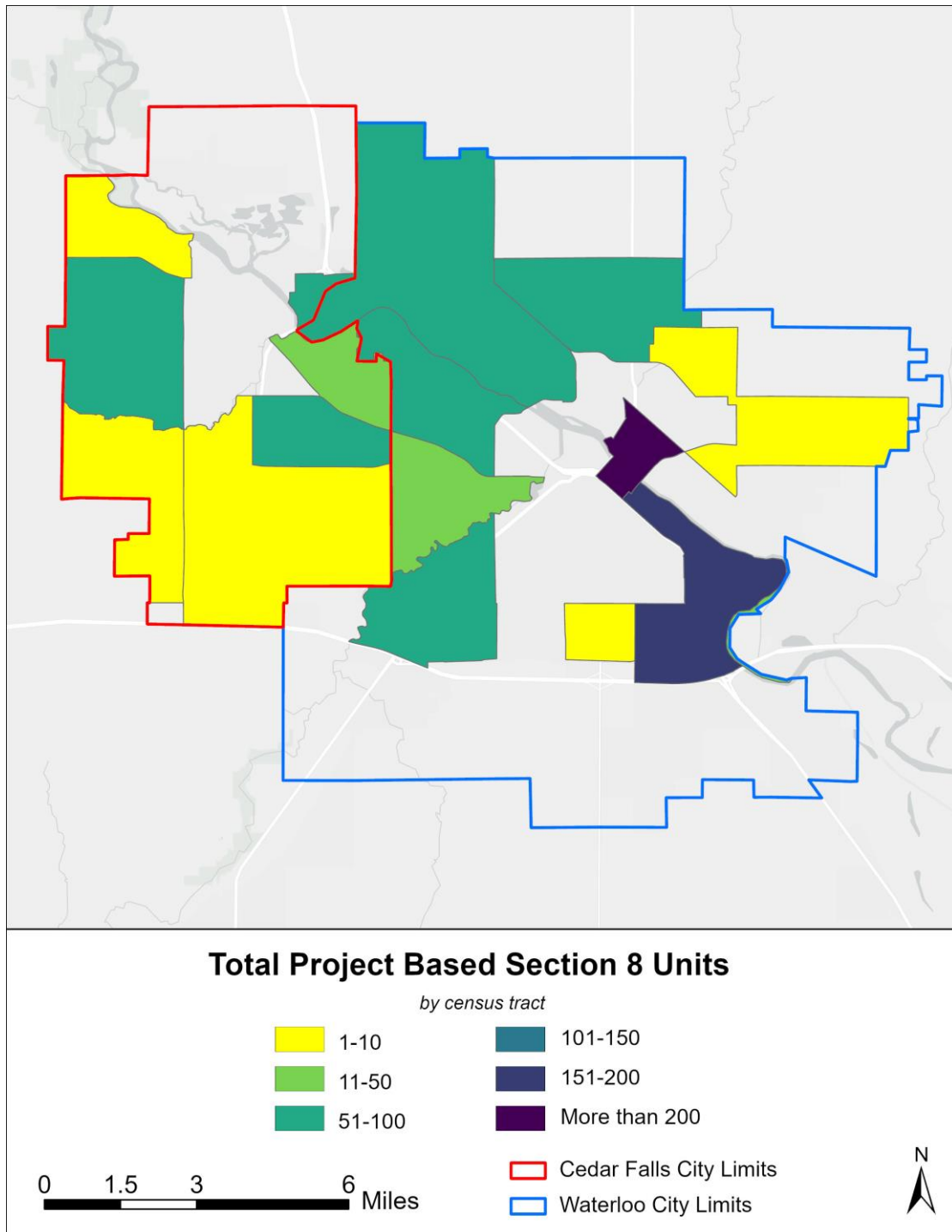
FIGURE 38 – DISTRIBUTION OF HOUSING CHOICE VOUCHERS IN THE WATERLOO-CEDAR FALLS HOME CONSORTIUM



Source: AP SH data, 2023

NOTE: Blank tracts have no vouchers in use according to AP SH data.

FIGURE 39 – DISTRIBUTION OF PROJECT BASED SECTION 8 UNITS IN THE WATERLOO-CEDAR FALLS HOME CONSORTIUM



Source: APSH data, 2023

NOTE: Blank tracts have no project-based Section 8 units according to APSH data.

CHAPTER 8. FAIR HOUSING ACTIVITIES

FAIR HOUSING COMPLAINTS

The HUD Office of Fair Housing and Equal Opportunity (FHEO) administers federal laws and establishes national policies that ensure that all Americans have equal access to the housing of their choice. An individual in Iowa who believes he or she has been the victim of an illegal housing practice may file a complaint with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. Typically, when a complaint is filed with FHEO, a case is opened and an investigation of the allegations of housing discrimination is initiated. During the investigation period, the agency will attempt through mediation to reach conciliation between the parties. If no conciliation agreement can be reached, the FHEO must prepare a final “Determination” report finding either that there is “reasonable cause” to believe that a discriminatory act has occurred or that there is no reasonable cause. If the agency finds “reasonable cause,” HUD must issue a “Charge of Discrimination.” If the investigator determines that there is no “reasonable cause,” the case is dismissed. If a charge is issued, a hearing/trial will be scheduled before an administrative law judge. The ALJ may award the aggrieved party injunctive relief, actual damages, and impose civil penalties; but unlike federal district court, the ALJ may not impose punitive damages. Administrative proceedings are generally more expedited than the federal court trial process. The advantages of seeking redress through the administrative complaint process are that the DFEH/FHEO takes on the duty, time, and cost of investigating the matter for the complainant and conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings.

Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers to protect the housing rights and interests of aggrieved individuals and families impacted by discrimination. Local civil rights advocacy organizations, such as the Cedar Falls Human Rights Commission and the Waterloo Commission on Human Rights, and the State of Iowa, through the Iowa Civil Rights Commission (ICRC) may also receive and investigate complaints of housing discrimination on behalf of protected classes.

The remainder of this section presents data on and analysis of housing discrimination complaint filings received by HUD’s FHEO, The ICRC, and the local human rights commissions in Cedar Falls and Waterloo. In evaluating the data that follows, the number of complaint filings alone should not be interpreted as a measure of the extent of housing

discrimination in a jurisdiction. Some communities may have large numbers of filings because of a healthy fair housing climate where residents are educated about their rights and know where to seek help and where strong advocates with a history of success in resolving fair housing issues are available to assist. A second caveat to consider is that a significant number of filed complaints are found not to have cause. Of the 36 total housing discrimination complaints reported by HUD for Waterloo and Cedar Falls (and further described below), 39% were found to have no cause. Therefore, while a complaint filing typically does suggest a perceived violation, recent HUD data indicates that nearly two in every five complaints does not meet the legal standard for charging a party with having committed housing discrimination.

Complaints Filed with HUD

Region VII of the FHEO receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Iowa, Kansas, Missouri, and Nebraska. The mission of the FHEO is to protect individuals from employment, housing and public accommodation discrimination, and hate violence. To achieve this mission, the FHEO maintains databases of and investigates complaints of discrimination and hate violence.

For the purpose of this report, the Regional FHEO Office in Kansas City provided fair housing complaint data for each of the cities spanning 2019-2023. HUD logged 29 complaint filings regarding housing in Waterloo and 7 filings concerning housing in Cedar Falls over the 2019-2023 period. The following tables, one for each city, display the bases of complaints received by FHEO by year over the five-year period. A single complaint can allege housing discrimination on multiple bases, so the numbers in these tables are not representative of the numbers of complaints received but only the number of times each basis was cited in the complaints filed in a given year. The full complaint data as supplied by the FHEO is found in the Appendix.

TABLE 20 – HOUSING DISCRIMINATION COMPLAINT BASES BY YEAR, CEDAR FALLS

Complaint Bases	2019	2020	2021	2022	2023	Total
Race	0	1	2	1	0	4
National Origin	0	0	0	0	0	0
Religion	0	0	0	0	0	0
Sex	0	0	0	0	0	0
Disability	0	0	1	1	0	2
Familial Status	0	1	0	0	0	1
Retaliation	0	0	0	1	0	1
TOTAL	0	2	3	3	0	8

Source: HUD Region VII Office of Fair Housing and Equal Opportunity

Housing discrimination complaints originating in Cedar Falls cite race as the basis of discrimination more often than any other basis; race is followed by disability. With a total

of just eight discrimination allegations over the preceding five-year period, the data does not lend itself to any detailed analysis of trends beyond highlighting that allegations of racial discrimination occur more frequently in Cedar Falls than do other types of discrimination. Analysis of complaint filing trends is better supported with Waterloo's data, which includes 35 total allegations of discrimination filed over the 2019-2023 period. Disability was the most common basis of complaint, representing 13 (37%) of the allegations. Disability is followed closely by race and then, with a substantially lower proportion, sex. The bases of national origin, familial status, and retaliation, each appeared only once in the five-year series of data.

TABLE 21 – HOUSING DISCRIMINATION COMPLAINT BASES BY YEAR, WATERLOO

Complaint Bases	2019	2020	2021	2022	2023	Total
Race	0	2	5	2	3	12
National Origin	0	0	0	1	0	1
Religion	0	0	0	0	0	0
Sex	0	0	2	4	1	7
Disability	2	1	3	4	3	13
Familial Status	0	0	1	0	0	1
Retaliation	0	0	0	1	0	1
TOTAL	2	3	11	12	7	35

Source: HUD Region VII Office of Fair Housing and Equal Opportunity

Complaints Filed with the Iowa Civil Rights Commission

The Iowa Civil Rights Commission (ICRC) also receives, investigates, and facilitates resolution of housing discrimination complaints (as well as complaints of discrimination in credit, education, employment and public accommodations) based on color, creed, family status (in credit and housing only), gender identity, marital status (in credit only), mental disability, national origin, physical disability, race, religion, retaliation, sex, or sexual orientation. The ICRC is tasked with upholding and enforcing the Iowa Civil Rights Act of 1965.

For this analysis, housing discrimination complaint data was requested from the ICRC on November 6, 2023 and again on March 11, 2024 for data reflecting the total number, the status, and the basis/bases of housing discrimination complaints received for the period 2019 through 2023. As of the date of this report, the ICRC had not provided any data in response.

Complaints Filed with the Cedar Falls Human Rights Commission (HRC)

The Cedar Falls Human Rights Commission was established in 1974 by Cedar Falls Ordinance No. 1430. The HRC is given authority to investigate and conciliate complaints of discrimination in housing, employment, educational curricula, and in public

accommodations, and is tasked with formulating and delivering community anti-discrimination education as well. In its current composition, the 11-member body endeavors to protect human rights and promote diversity and equity for all Cedar Falls residents through advocacy, education and outreach. The HRC's webpage includes information on how to register a discrimination concern with the Commission and also links to the Iowa Civil Rights Commission as an alternative avenue for filing a complaint of discrimination.

For the period January 1, 2019 through September 30, 2023, the HRC received just one housing discrimination complaint. The complaint was filed in 2023, however, before the commissioners could schedule an in-person meeting for an official intake, the complainant reported the issue had been resolved.

Complaints Filed with the Waterloo Commission on Human Rights (HRC)

The Waterloo Commission on Human Rights is an administrative agency within the City of Waterloo that was established in 1966. The Commission's mission is to protect and promote the personal dignity of all Waterloo citizens by eliminating discriminatory barriers that prevent individuals from reaching their full productive capacities. The Commission is empowered to receive and investigate complaints alleging unfair or discriminatory practices. A further element of the Commission's responsibility concerns community-based education, outreach, and training on issues of human and civil rights.

The Commission had no responsive data to provide regarding housing discrimination complaints it had received over the period January 1, 2019 through September 30, 2023, and stated that it is the Commission's practice to refer such complaints directly to HUD or the ICRC for investigation.

PAST FAIR HOUSING GOALS AND RELATED ACTIVITIES

The Cities of Waterloo and Cedar Falls have previously conducted a joint Analysis of Impediments to Fair Housing Choice, or AI, which was published in 2014. This AI identified thirteen potential impediments to fair housing choice. These impediments are shown in the tables that follow, along with a statement of the progress made toward addressing them over the intervening period of time.

TABLE 22. ACTIONS TAKEN TO ADDRESS PREVIOUSLY-IDENTIFIED IMPEDIMENTS

Impediment	Actions Taken Since Previous AI
<p>1. No strategy to meet the market needs of the growing limited-English-speaking population has been introduced.</p>	<ul style="list-style-type: none"> • Cedar Falls: now utilizing "Hands Up Communication" as a means to communicate with residents who speak a language other than English. • Waterloo: developed a comprehensive strategy to meet the needs of the LEP population
<p>2. There is a growing mismatch between real income and housing cost.</p>	<ul style="list-style-type: none"> • Cedar Falls: funded a direct rental assistance program for low-income rental housing; purchased software intended to better showcase rentals accepting HCV vouchers • Waterloo: provides a tax abatement program intended to keep housing affordable and assist owners in making needed repairs; instituted a committee known as the GROW Committee to discuss and resolve housing issues; implemented a Housing Task Force to discuss and address housing issues; instituted an Emergency Repair Program to assist homeowners with emergency repair costs; implemented a down-payment assistance program for low-income homebuyers
<p>3. It is difficult for large families and people with disabilities to access quality, affordable, suitable housing.</p>	<ul style="list-style-type: none"> • Cedar Falls: funded a direct rental assistance program for low-income rental housing; purchased software intended to better showcase rentals accepting HCV vouchers; implemented a rental rehabilitation program • Waterloo: provides a tax abatement program intended to keep housing affordable and assist owners in making needed repairs; instituted a committee known as the GROW Committee to discuss and resolve housing issues; implemented a Housing Task Force to discuss and address housing issues; instituted an Emergency Repair Program to assist homeowners with emergency repair costs; implemented a down-payment assistance program for low-income homebuyers; instituted a lead abatement program funded by a 2021 Lead Hazard Control Grant
<p>4. The gap between White and minority median household incomes, unemployment rates, and homeownership rates is large and growing.</p>	<ul style="list-style-type: none"> • None noted

<p>5. The supply of larger rental housing units may not match the demand from protected classes.</p>	<ul style="list-style-type: none"> • Waterloo: instituted a committee known as the GROW Committee to discuss and resolve housing issues; implemented a Housing Task Force to discuss and address housing issues
<p>6. The City of Waterloo's zoning provisions regarding group homes limit their capacity to integrate into the community.</p>	<ul style="list-style-type: none"> • None noted
<p>7. The strict definition of family imposes a barrier to the formation of non-traditional households.</p>	<ul style="list-style-type: none"> • Cedar Falls: amended zoning code to comply with Iowa law on the definition of family
<p>8. The Cedar Falls Human Rights Commission does not have the capacity to assertively enforce the provisions of the municipal human rights ordinance.</p>	<ul style="list-style-type: none"> • None noted
<p>9. The indefinite closure of the Northeast Iowa Center for Independent Living and cancellation of the MET's Prime Time Pass program severely limit access for elderly and disabled residents, as well as employees working atypical hours.</p>	<ul style="list-style-type: none"> • Cedar Falls: allocated CDBG funding towards transportation services in previously underserved areas
<p>10. A lack of transit connections to growing commercial corridors and suburban employment areas limits job access as well as access to community assets.</p>	<ul style="list-style-type: none"> • Cedar Falls: allocated CDBG funding towards transportation services in previously underserved areas

11. Ongoing patterns of disparity in private lending may indicate mortgage discrimination.	<ul style="list-style-type: none">• None noted
12. Testing for housing discrimination has not been conducted recently, despite positive results from the previous test and complaints of steering within the housing market.	<ul style="list-style-type: none">• None noted
13. Fair housing issues exist within both Waterloo and Cedar Falls' Nuisance Properties and Rental Inspection ordinances.	<ul style="list-style-type: none">• None noted

CHAPTER 9.

IDENTIFICATION OF IMPEDIMENTS

Described below are the fair housing impediments identified in this Analysis of Impediments, along with associated contributing factors and supporting datapoints. Following these narrative descriptions is a table containing recommended actions, responsible parties, and potential partners for addressing the named impediments.

Impediment 1: Existing housing stock fails to meet various needs of the population, disproportionately impacting protected classes

Applies to: Waterloo and Cedar Falls

Data collection, stakeholder interviews, and community meetings all indicate that the existing housing stock in both Waterloo and Cedar Falls fails to meet the needs of the population in a variety of ways, many of which disproportionately impact protected class groups. The following factors contribute to this impediment to fair housing in the Waterloo-Cedar Falls HOME Consortium:

Age and condition of housing stock, particularly in Waterloo

Many stakeholders and community members noted during the community engagement process that poor housing condition is a major factor that limits housing access, especially in Waterloo. In particular, participants noted that low-income rental housing is frequently not kept up to code and that there are few or no incentives in place to prompt landlords to repair or maintain rental properties, and that the code enforcement departments in Waterloo and Cedar Falls may not be staffed adequately enough to make an impact. When surveyed, 59% of survey respondents believed that a lack of neighborhood investment constituted a barrier to fair housing within the Consortium, and 79% said that there is a medium- to high- level of need for programs that help homeowners make home repairs and improvements.

Data from the U.S. Census Bureau indicates that more than 75% of Waterloo homes and more than 50% of Cedar Falls homes were constructed before 1980 and therefore present a risk of lead exposure. Data also indicates that around 28% of Consortium residents have one or more HUD-defined housing problems, and that residents of protected classes are disproportionately more likely to experience a housing problem. In particular, Black and Pacific Islander residents were more than twice as likely to experience one or more housing problems than white residents. Housing problems also decrease consistently as

income levels increase, which inadvertently impacts protected class groups as disabled residents⁵³ and Black or Hispanic residents⁵⁴ typically have lower median incomes than white and/or abled residents due to decades of systemic inequality.

Perhaps most interestingly, Waterloo's change in occupancy since 2000 has not closely correlated to the development of new units in the way that Cedar Falls' has – Waterloo has added nearly 2,500 new units since 2000 but recorded an increase of less than 800 occupied units during that time frame; Cedar Falls added 3,300 units, 2,600 of which are occupied. In combination with other data on housing age and condition and with community feedback, this discrepancy may indicate that Waterloo residents are moving out of units in sub-par condition into new units as they become available. If true, this would mean that a portion of Waterloo's vacant units may remain vacant indefinitely due to their condition.

A lack of affordable and accessible housing for residents with disabilities

Around 16% of Waterloo residents and 10% of Cedar Falls residents have at least one disability, for a total of nearly 15,000 disabled residents within the Consortium. Despite these numbers, the cities contain no Section 811 or Section 202 housing units. When surveyed, 49% of consortium survey respondents reported believing that a lack of accessible housing options presented a barrier to fair housing choice, 76% said the Consortium has a medium- to high- level of need for more housing for people with disabilities, and 25% of respondents who reported having experienced housing discrimination said they believed the discrimination was based on their disability. Additionally, for people whose disability renders them unable to work a conventional job, affordable housing is nearly impossible to find within the Consortium – the 2024 SSI payment is \$934 per individual, which means that a person who relies on SSI payments for income would have to find a rent of \$314 or less to avoid being cost burdened. According to the National Low Income Housing Coalition the fair market rent for a one-bed unit in the area was \$740 in 2023; however, residents who provided feedback consistently noted that HUD fair market rents fail to keep up with rapidly growing housing costs and do not provide a realistic picture of the housing market, suggesting that finding a one-bed unit for \$740 would be highly unlikely. Cedar Falls has recently adopted HUD Small Area Fair Market payment standards which increased the Housing Choice Voucher payment standard. A one-bedroom unit that prior to May 1, 2024, had a payment standard of \$810 (rent + utilities), now has a payment standard of \$924 (rent + utilities). This increase has had a positive impact on the ability of Housing Choice Voucher tenants

⁵³ <https://www.statista.com/statistics/978989/disability-annual-earnings-us/>

⁵⁴ <https://www.epi.org/blog/racial-disparities-in-income-and-poverty-remain-largely-unchanged-amid-strong-income-growth-in-2019/>

being able to lease up in Cedar Falls where housing costs are higher than other surrounding communities.

An inadequate overall housing supply and a lack of variety in housing types and sizes

Single-family homes are the predominant type of housing in both Waterloo and Cedar Falls, comprising more than 70% of each city's housing stock between detached and attached units. During the community feedback process stakeholders noted a need for more multi-family housing options, especially those prioritizing affordability. Some feedback noted that a disproportionate amount of new multi-family developments are luxury apartment buildings, which only furthers the affordability gap. Many residents also stated that the presence of the University of Northern Iowa in Cedar Falls creates intense competition for housing near the campus, noting that workers and families in the area are unable to compete with a group of multiple college students for single-family rental prices. This feedback indicates that more affordable multi-family units would be especially beneficial near the college campus.

Additionally, vacancy data for the Consortium indicates that the overall supply of units may be inadequate, regardless of unit type or size. Vacancy rates in both cities have increased from extremely low rates of 3.3-4.5% in the year 2000 but still remain lower than average, indicating that demand for new housing is still outpacing supply. Waterloo's vacancy rate of 9.5% is marginally lower than the national average vacancy rate of 10.8%, while Cedar Falls' vacancy rate is significantly lower at 6.9%, indicating a very tight housing market.

Impediment #2: Lacking resources and opportunities in R/ECAPs and low-income areas limits housing choices.

Applies to: Waterloo and Cedar Falls

When comparing access to resources and other services, Waterloo had lower levels of access compared to Cedar Falls due to its higher levels of poverty and unemployment. Because these under resourced communities lack certain opportunity features, housing in these locations is generally less able to meet the needs of residents. The need for neighborhood investment is particularly acute in parts of central Waterloo where there is a high concentration of minority populations. For example, these census tracts have the highest unemployment rates and lowest median incomes. The most under-performing schools, among both Cedar Falls and Waterloo, are also found within the city of Waterloo. While public transit is accessible throughout both cities, its service is limited and prevents many from being able to rely on this as a form of transportation in and out of the cities. The majority of jobs available in the cities are also found within their central areas where population density is highest, however high unemployment rates in certain census tracts indicates many people in need of employment may not qualify for them and, therefore, do not benefit as would be expected from being in close proximity to these jobs.

- **Labor Market Engagement:** Unemployment is highest in the single R/ECAP tract in Downtown/East Waterloo, which also has the highest concentration of minority populations. Only between 40.5% to 51.6% of people aged 16+ within the tract participate in the labor force. However, overall, Cedar Falls and Waterloo have similar labor market engagement rates, with most tracts having over 60% of people participating in the labor force.
- **Schools:** The largest disparity between Cedar Falls and Waterloo involves school proficiency and performance. All but one of Waterloo's schools, score below the state's average in different performance measures such as mathematics, post-secondary readiness, and more, while schools in Cedar Falls all meet or exceed the state average. Additionally, educational attainment is higher in Cedar Falls, where the majority of tracts have over 43.2% to 59.9% of residents who have a bachelor's degree or higher. In terms of educational attainment by race, rates are similar among most racial groups in Waterloo, where 20% to 25% have a bachelor's degree or higher. However, Native Americans and Native Hawaiian/Pacific Islander residents have the lowest educational attainment rates. In Cedar Falls, Black residents have the lowest educational attainment of all groups, where less than 5% or less have a bachelor's degree or higher.
- **Transportation:** Based on interviews and focus group discussions, transportation is a pressing issue in Waterloo and Cedar Falls. While MET Transit has several routes that cover most of Waterloo and Cedar Falls, residents and stakeholders described its service overall as limited and unreliable for people who work late night shifts. MET's operating hours are limited to traditional school and work hours (5:45AM to 6PM). Additionally, Paratransit services are offered, however, a person needs to be eligible based on physical needs/disabilities and requires verification from medical professional, etc. It is not offered to people who need door-to-door service because the routes do not cover their area. Overall, Waterloo's R/ECAP tract and parts of central Waterloo have the highest rates of households without access to a vehicle. The majority of both cities have access to at least one vehicle, making the cities car dependent and thus have scored low on their walkability score.
- **Food:** USDA Food Research Atlas data indicates that the share of residents who have low incomes and live further than one-half mile from the nearest supermarket is highest in census tracts further out from central Waterloo and Cedar Falls. Particularly, food access was emphasized as a concern by Waterloo residents and stakeholders who noted that downtown Waterloo has been recognized as a food desert and there is a high need for healthier and affordable food options.
- **Healthcare:** The proportion of residents who are uninsured is highest in central Waterloo and its surrounding census tracts where there is a higher concentration of minority populations. More than 10.5% of the population in these areas are uninsured.

Together, these measures indicate that a lack of access to high-quality community facilities, resources, and services in some areas of the Cities restrict access to fair housing choice by limiting opportunity for residents. To address disparities in community resources and associated lack of access to opportunity, meeting attendees, survey respondents, and stakeholders interviewed during this planning process emphasized the need for continued investment in neighborhood services, facilities, and infrastructure in these communities.

Impediment 3: A lack of a centralized homelessness or poverty reduction plan and related services creates disproportionate barriers for protected classes

Applies to: Waterloo and Cedar Falls

In 2023, the Institute for Community Alliances in Iowa produced a report titled “Snapshot 2023 of Service and Shelter Use & County Data Book” which provides homelessness data detailed by county. The report identified a total of 1,309 individuals in 933 households who experienced homelessness in Black Hawk County at some point in 2022. While data specific to Black Hawk County is not available for previous years, a comparison of the 2023 report using 2022 data with the 2020 report using 2019 data shows that Iowa has experienced a 160% increase in people seeking homeless services since the COVID-19 pandemic. This indicates that homelessness is a growing concern in the state and likely in the region, yet the Consortium lacks a centralized homelessness and/or poverty reduction plan, meaning that homeless residents may struggle to access information on available resources. The following factors contribute to this impediment to fair housing in the Waterloo-Cedar Falls HOME Consortium:

A homeless population disproportionately comprised of federally protected classes

In 2022, 26.5% of people identified as homeless during the Iowa Balance of State CoC Point-In-Time count were Black. Only 4.1% of the population of the State of Iowa is Black, meaning that Black Iowans are present among the homeless population at a rate more than six times greater than their overall population share. Native American and Hispanic residents were also disproportionately represented among the homeless population, although to a less extreme degree.

In addition to disproportionate representation by race or ethnicity, the National Association of City and County Health Officials reported in 2019 that an estimated 25% of the homeless population was disabled⁵⁵. As this number was reported prior to the COVID-19 pandemic, it is possible that disability rates have increased in the time since.

⁵⁵ [https://www.naccho.org/blog/articles/homelessness-among-individuals-with-disabilities-influential-factors-and-scalable-solutions#:~:text=Point%2Din%2Dtime%20counts%20\(,health%20and%2For%20substance%20abuse](https://www.naccho.org/blog/articles/homelessness-among-individuals-with-disabilities-influential-factors-and-scalable-solutions#:~:text=Point%2Din%2Dtime%20counts%20(,health%20and%2For%20substance%20abuse)

American Community Survey data for 2019 reports that the national average disability rate at this time was 12.6%, meaning that disabled Americans experience homelessness at double the rate of their population share.

Finally, in a first-of-its-kind study, the Williams Institute out of the UCLA School of Law found in 2020 that LGBTQ+ adults were more than twice as likely to experience homelessness than adults who were not a member of this group⁵⁶. In particular, transgender adults were significantly more likely to experience homelessness than non-transgender adults, whether gay or straight. The study also found that the incidence of homelessness among LGBTQ+ adults was compounded by race and ethnicity, with Black LGBTQ+ adults and especially Black transgender adults being the most likely to experience homelessness.

A lack of a Consortium, county, or area-wide poverty or homelessness reduction plan

A variety of local agencies, including local government entities, non-profits, and faith-based organizations, provide services to special needs populations in Waterloo and Cedar Falls, but there is no clear lead coordinating agency uniting or promoting collaboration between these agencies. In the past, the Black Hawk County Local Homeless Coordinating Board was as the lead coordinating agency for the administration of homeless services in the area through the Iowa Balance of State Continuum of Care; however, it is unclear whether this organization still remains functional and active in 2024. Without a lead coordinating agency or plan, the Consortium fails to outline and pursue goals directly related to preventing homelessness or assist individuals experiencing homelessness, instead relying on fragmented organization-based policies and programs which may allow the most vulnerable residents to fall through the cracks. This potential weakness may hinder the Consortium's ability to set strategic goals and collaborate on services provided.

A lack of centralized city-run homeless services and shelter options

The Consortium relies heavily on local non-profits and religious institutions to provide homeless services and shelter and provides few City-funded or City-specific services apart from publicly supported housing. LGBTQ+ residents may face extra difficulty in finding shelter and services since they are frequently excluded from services provided by the Salvation Army⁵⁷, which is one of the Consortium's primary homeless service providers. During the community engagement process for this Analysis of Impediments, one stakeholder who works in homeless services relayed a story of a client who was evicted from the Waterloo Salvation Army men's shelter after it was discovered that he was transgender. As gender identity and sexual orientation are protected classes, and as

⁵⁶ <https://williamsinstitute.law.ucla.edu/publications/lgbt-homelessness-us/>

⁵⁷ <https://www.advocate.com/salvation-army>

there is significant intersection between these classes, race and ethnicity, and homelessness, this presents a significant barrier to fair housing.

Impediment 4: Zoning Restrictions Limit Housing Options for Protected Classes

Applies to: Waterloo and Cedar Falls

Housing accessible to people with disabilities is in short supply in both Waterloo and Cedar Falls. In the fair housing survey conducted as part of this analysis, more than three in four respondents rated housing options for people with disabilities either a high need or moderate need. Resident input obtained through focus groups and pop-up interactions further supported this finding, with residents describing the cities' housing stock as generally older (particularly in Waterloo) and frequently with steps at the entrance, making it less likely to be accessible and expensive to modify.

Compounding the unique needs for increased housing supply for people with disabilities, there are provisions of the cities' respective zoning codes that could have the effect of further limiting housing options for this protected class. Neither of the two jurisdictions currently has a reasonable accommodation process or provision in their zoning ordinances. Federal fair housing law requires that municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, or even waive certain requirements, when it is reasonable and necessary to eliminate barriers to housing opportunities. Residents needing a variance from the land use and zoning regulations due to a disability must otherwise go through the formal variance process, including a public hearing. Whereas simple administrative procedures may be adequate for the granting of a reasonable accommodation, the variance procedures, or a reasonable accommodation that must be considered and granted by action of a public body, like a planning commission or city council, may subject the applicant to the public hearing process, with its costs and delays, and the potential that community opposition based on stereotypes about people with disabilities may impact the outcome. As a matter of equity, transparency, and uniformity, it is advisable that the Cities each adopt a standardized, administrative process for granting reasonable accommodations.

Group homes provide an important source of housing for some people with disabilities and federal fair housing guidelines have established that persons with disabilities must be allowed to live together in group homes in single-family residential districts, comparable to groups of unrelated non-disabled people living together as may be permitted under a zoning code's "family" definition. Cedar Falls considers group homes (of less than 9 individuals) to be equivalent to single-family households (limited to 4 related individuals per household) and are thus allowed in single-family residential districts. In Waterloo, group homes are allowed in multi-family residential districts, but not in single-family districts.

Residential treatment facilities, which typically provide integrated supportive services such as counseling, can be an important source of housing for people recovering from

drug or alcohol abuse (who are considered persons with disabilities under the Fair Housing Act), domestic violence victims, and people who were formerly homeless or incarcerated. In Cedar Falls, the zoning ordinance considers this inherently residential use together with that of healthcare facilities and limits them to districts for civic and institutional use, thus preventing them from any residential zoning districts. Although there is some ambiguity, Waterloo appears to consider such uses to be group homes, in which case, they would be allowed in some residential districts. The ambiguity in distinguishing between group homes and halfway or rehabilitation houses, however, could create an opportunity for discrimination in the event the ordinance is interpreted or applied inconsistently.

Impediment #5: Historic inequalities and negative community perceptions continue to limit opportunity and housing choice

Applies to: Waterloo and Cedar Falls

This impediment addresses community attitudes that inhibit housing options for protected classes, including racial and ethnic minorities and immigrants. Public input indicated that negative perceptions of Waterloo persist within the community, particularly in comparison to Cedar Falls. Over time, these perceptions have impacted the private sector's level of investment and interest in development in Waterloo as well as prospective residents' choices as to where to live within the Cedar Valley. During focus groups and interviews, residents and stakeholders alike brought attention to the generally negative perceptions of Waterloo, both locally and regionally, due to fears around violence, homelessness, and lower quality of life. However, Waterloo has experienced some growth particularly among migrant populations who are settling in the city in search of better opportunity. Due to the low wages most undocumented and LEP populations are often limited to, their housing choice is thus impacted as they struggle to compete with rising rent prices. Because Cedar Falls is known to have a higher cost of living due to its concentration of affluent households and therefore lower-income households may be limited to Waterloo more relatively affordable housing options.

Waterloo also has a higher concentration of Black residents who have historically been subjected to racist policies that have had lasting impacts in the region. A recent case study conducted by the Grout Museum District analyzed race relations in Waterloo from as early as 1910⁵⁸. Specifically, restrictive covenants and redlining were utilized as a way to segregate Black and white residents in Waterloo (and Cedar Falls as well). This resulted in severe overcrowding of Black families and forcing them into areas with extreme poverty and crime. By the 1970s, the city experienced "white flight" and urban sprawl that led white families into new neighborhoods on the city's southwest side creating

⁵⁸ <https://www.groutmuseumdistrict.org/about/news/the-history-of-waterloo-a-case-study-.aspx>

further disinvestment of Waterloo's core neighborhoods. Today, Waterloo has been nationally ranked as one of the worst cities for Black Americans based on income and social inequality⁵⁹. Additionally, Waterloo has dealt with several noteworthy incidents that have sparked racial tension throughout the city, reinforcing some negative stereotypes regarding its reputation.

Given the city's negative perceptions both nationally and in comparison, to Cedar Falls, residents of Waterloo have voiced their desire for more community development and investment in the city to help encourage affordable housing, better living conditions, investment in its built environment from parks to infrastructure, and strategic economic development that can empower residents with skills and better-paying opportunities. In order to promote a stronger sense of community and identity throughout the city, community engagement participants stressed the significance for collaboration between the local government, community organizations, BIPOC residents, and the youth.

Impediment 6: Need for Continued Fair Housing Education

Applies to: Waterloo and Cedar Falls

Waterloo and Cedar Falls benefit from a relatively well-developed fair housing infrastructure, evident in the human rights commissions maintained by each of the cities. Iowa state law requires cities with populations exceeding 29,000 people to create independent civil rights organizations to interface with the Iowa Civil Rights Commission for the purpose of coordinating investigations and expediting housing discrimination complaints. The cities' respective commissions comply with the state's requirements in this regard. Both commissions were consulted in the course of this study and their close coordination with ICRC was evident in their responses to requests for housing discrimination complaint data. Even so, input collected from stakeholders and residents indicated that these commissions' roles in providing fair housing education and/or receiving housing discrimination complaints was unclear. Several people who provided input for this analysis relayed a belief that these commissions have been more active and engaged in this work at points in the past. Because of the organizational capacity, fair housing expertise, and other resources these commissions bring to the table, opportunities to enhance their responsibilities and step up their role as local coordinators of fair housing activity should be explored in both Waterloo and Cedar Falls. Iowa Legal Aid and an array of other, smaller nonprofit organizations were mentioned by respondents as additional fair housing resources, but each was generally seen as working

⁵⁹ <https://www.desmoinesregister.com/story/news/2018/11/19/iowa-waterloo-cedar-falls-metro-area-city-named-worst-place-black-americans-live-24-7-wall-street/2026602002/>

individually rather than as part of a coordinated mechanism to provide fair housing education and complaint intake across the community more broadly.

Responses to the community survey conducted as part of this analysis suggest that the need for fair housing education is ongoing. Specifically, only 46.8% of respondents reported knowing their fair housing rights and just over half (50.4%) said they knew where to file a report of housing discrimination. These results indicate that education efforts have reached some residents, but there is still a need for continued outreach to the public, especially with information about tenant rights, the value of filing a complaint when discrimination occurs, and the responsibilities of landlords to maintain their rental properties.

Further, as part of their fair housing outreach and education efforts, the Cities should also consider ways to further promote homeownership incentives and assistance programs. These could include any downpayment assistance activities offered by the cities themselves, their subrecipients, or programs offered by the state or other entities. The analysis of Home Mortgage Disclosure Act (HMDA) data in this report found that Black residents apply for mortgages at lower rates and are denied mortgages at higher rates than nearly all other racial or ethnic groups. Asian and Pacific Islander residents attempted to obtain mortgages at considerable rates, but faced high rates of denial. Raising awareness within the community at large, and among Black and other minority residents in particular, of supports and programs that make homeownership more attainable may help to level those disparities.

TABLE 23 – FAIR HOUSING GOALS AND ACTIVITIES

Contributing Factors	Recommended Activities and Goals	Responsible Parties and Partners
Impediment #1: Existing housing stock fails to meet various needs of the population, disproportionately impacting protected classes		
Age and condition of housing stock	<ul style="list-style-type: none"> • Expand existing programs that help homeowners with emergency repairs and expand or institute programs to assist homeowners with non-emergency repairs which may impact a home's livability; set a goal for number of households assisted and assess the results in each city's yearly CAPER. • Expand code enforcement inspections and requirements for landlords of low-income rental units, including, if necessary, the expansion of the code enforcement department. • Expand or institute City-sponsored programs intended to rehabilitate or demolish and rebuild blighted units; set a goal for number of units assisted and assess the results in each city's yearly CAPER. • Create and distribute materials to all residents of publicly supported housing, especially HCV holders, detailing renters' fair housing rights and landlord obligations for upkeep, maintenance, and repairs, including information on resources for situations in which landlords fail to provide required upkeep and repairs. 	City of Waterloo City of Cedar Falls
A lack of affordable and accessible housing options for residents with disabilities	<ul style="list-style-type: none"> • Consider opportunities to encourage or incentivize the construction of new accessible housing units for people with disabilities. <ul style="list-style-type: none"> ○ Any public subsidies for new housing development for people with disabilities should be given priority consideration when the housing will be located in an area that increases access to transit and opportunities. 	City of Waterloo City of Cedar Falls Community Partners

	<ul style="list-style-type: none"> ○ When new accessible housing is proposed by a developer, organization, or agency, express support (through letters of support and/or certifications of consistency with the Consolidated Plan) wherever possible. ○ Review local funding mechanisms and federal grant sources for opportunities to incentivize development of new accessible housing units and/or support the cost of accessibility modifications to existing housing. ○ Meet with local providers of accessible housing and permanent supportive housing to discuss resources available and potential for collaboration on future proposed housing developments. ● Investigate the potential for a) expanding Cedar Falls' HCV unit listing software into Waterloo and b) adding information on accessibility features in listed units that accept Housing Choice Vouchers. ● Determine the percentage of public housing and Project-Based Section 8 units within the Consortium that have accessibility features and set an annual target for increasing that percentage of units over time. 	
<p>An inadequate overall housing supply and a lack of variety in housing types and sizes</p>	<ul style="list-style-type: none"> ● Conduct a housing market study to consider avenues for incentivizing development of new multi-family units, particularly within Waterloo and in the area of Cedar Falls near the University of Northern Iowa campus. ● Using the findings of the market study, create a plan to incorporate such incentives and a goal for number of multi-family units added per year; then assess the progress toward this goal in each City's annual CAPER. ● Introduce inclusionary zoning provisions that would incentivize the set-aside of low-income or affordable housing in all new multi-family developments. 	<p>City of Waterloo City of Cedar Falls</p>

Contributing Factors	Recommended Activities and Goals	Responsible Parties and Partners
Impediment #2: Lacking resources and opportunities in R/ECAPs and low-income areas limits housing choices		
Need for neighborhood revitalization and safety improvements in areas of low opportunity	<ul style="list-style-type: none"> • During the Consolidated Plan and Annual Action Plan processes, the Cities should identify place-based strategies focused on improving physical resources and building human capital in specific, defined high-poverty areas, particularly in low-income tracts in Waterloo. • Develop and keep up-to-date an inventory of areas in Waterloo where public infrastructure is lacking, limited, or otherwise in jeopardy. Outline a strategy for funding projects which address unsafe property conditions, streetlights, sidewalks, infrastructure, and public facilities. • Continue to support low-income homeowners in need of home repairs and rehabilitation. 	City of Waterloo City of Cedar Falls
Low-income areas are underserved relative to access to grocery and other neighborhood-oriented retail	<ul style="list-style-type: none"> • Continue to support economic development in downtown Waterloo which has low access to grocery stores and other retail options for residents. • During the Consolidated Plan and Annual Action Plan processes, the City should create a place-based strategy to provide business and entrepreneurial support, including financial and technical assistance, to eligible new or expanding businesses that fill market niches and create jobs for low-income residents. 	City of Waterloo

<p>Low school proficiency disproportionately impacts African American and Latino residents.</p>	<ul style="list-style-type: none"> • Partner with Waterloo and Cedar Falls school districts, community stakeholders, and others to provide facilities, resources, and services to students attending lower-performing schools. These may include basic school resources and supplies, school readiness, mentoring and tutoring, family engagement and literacy, health services, behavioral and social supports, enrichment programs, programs to increase food security and access, support for ESL students and students with disabilities, resources for students experiencing homelessness or who are part of economically disadvantaged households, and other resources and services. 	<p>City of Waterloo City of Cedar Falls Waterloo Community Schools District Cedar Falls Community Schools District Black Hawk County</p>
<p>Overall public transit service is limited in Waterloo and Cedar Falls. There is a need for third shift/late night workers, accessibility issues for people with disabilities, and public safety concerns regarding lack of signage/lights.</p>	<ul style="list-style-type: none"> • Improve pedestrian and bike facilities to better connect residential areas with various community resources and opportunities. <ul style="list-style-type: none"> ○ Analyze sidewalk networks, pedestrian safety, ADA accessibility, and bike lanes/paths in low- and moderate-income neighborhoods to determine potential need for enhanced pedestrian and bike facilities to connect residential areas with shopping, healthcare, bus stops, employment areas, and other destinations. Also consider the availability of pedestrian infrastructure connecting key destinations (major employers or employment centers, shopping areas, etc.) with the closest bus stop. Develop priorities for improvements. ○ Based on this analysis, make recommended sidewalk and bike lane/path improvements, beginning with the highest priorities. • Continue to monitor opportunities to improve transit access between Waterloo and Cedar Falls neighborhoods, suburban population centers, and major employers/employment centers and modify routes and schedules as needed. 	<p>City of Waterloo City of Cedar Falls MET Transit Authority Black Hawk County</p>

Contributing Factors	Recommended Activities and Goals	Responsible Parties and Partners
Impediment #3: A lack of a centralized homelessness or poverty reduction plan and related services creates disproportionate barriers for protected classes		
<p>A homeless population disproportionately comprised of Federally protected classes</p>	<ul style="list-style-type: none"> Using CDBG funding, expand existing assistance programs targeting extremely low-income residents who are at an increased risk of homelessness, a group disproportionately comprised of federally protected classes; report on the number of individuals assisted by homelessness prevention programs by type of assistance received in each City's annual CAPER, including demographic data where possible. 	<p>City of Waterloo City of Cedar Falls Community Partners</p>
<p>A lack of a Consortium, county, or area-wide poverty or homelessness reduction plan</p>	<ul style="list-style-type: none"> Using data generated in this report and in each City's new Consolidated Plan, the Cities should jointly convene a homelessness prevention conversation in collaboration with existing homeless service providers to better understand local homelessness trends and design mitigation measures to reduce homelessness; set measurable goals to assess efficacy and report on progress towards these goals in each City's annual CAPER. 	<p>City of Waterloo City of Cedar Falls Continuum of Care Community Partners</p>
<p>A lack of centralized City-run homeless services and shelter options</p>	<ul style="list-style-type: none"> the Cities should convene a homelessness prevention conversation in collaboration with existing homeless service providers to consider the feasibility of creating a joint City-sponsored homeless shelter program. Explore potential funding or other resource options for the construction and operation of a shelter program or facility. Investigate whether the Black Hawk County Local Homeless Coordinating Board is still operational; if not, form a new homelessness task force or committee including representatives from Waterloo, Cedar Falls, and existing local homeless service providers to guide overall homelessness assistance strategy across Waterloo and Cedar Falls. 	<p>City of Waterloo City of Cedar Falls Continuum of Care Community Partners</p>

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| | <ul style="list-style-type: none">• Task either the Black Hawk County Local Homeless Coordinating Board or a potential new homelessness task force with producing a centralized resource guide for individuals experiencing or at risk of homelessness in the area; ensure collaboration with local homeless service providers in order to encompass all available resources. | |
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Contributing Factors	Recommended Activities and Goals	Responsible Parties and Partners
Impediment #4: Zoning Restrictions Limit Housing Options for Protected Classes		
<p>Insufficient accessible housing exists to serve the needs of people with disabilities</p>	<ul style="list-style-type: none"> • Consider opportunities to encourage or incentivize the construction of new accessible housing units for people with disabilities. <ul style="list-style-type: none"> ○ Any public subsidies for new housing development for people with disabilities should be given priority consideration when the housing will be located in an area that increases access to transit and opportunities. ○ When new accessible housing is proposed by a developer, organization, or agency, express support (through letters of support and/or certifications of consistency with the Consolidated Plan) wherever possible. ○ Review local funding mechanisms and federal grant sources for opportunities to incentivize development of new accessible housing units and/or support the cost of accessibility modifications to existing housing. ○ Meet with local providers of accessible housing and permanent supportive housing to discuss resources available and potential for collaboration on future proposed housing developments. • Investigate the potential for a) expanding Cedar Falls' HCV unit listing software into Waterloo and b) adding information on accessibility features in listed units that accept Housing Choice Vouchers. 	<p>City of Waterloo City of Cedar Falls Community Partners</p>

<p>Waterloo and Cedar Falls do not have clear and objective processes by which persons with disabilities may request a reasonable accommodation</p>	<ul style="list-style-type: none"> • Draft and adopt local code amendments that would provide an administrative alternative to a variance application for people requesting accommodation or modification related to a disability. 	<p>City of Waterloo City of Cedar Falls</p>
<p>Restrictions on group homes, residential treatment facilities, and “family” definitions in the Cities’ zoning codes may create barriers to the development and siting of some types of group housing for people with disabilities</p>	<ul style="list-style-type: none"> • The zoning ordinance and table of permitted uses should be reviewed and amended to clarify where group homes and residential substance abuse treatment facilities may be located, taking care to ensure these uses may be permitted within residential zoning districts. • Revise the zoning code’s family definition to mean a “functional family” or remove the definition altogether in favor of maximum occupancy being regulated instead by the building code. 	<p>City of Waterloo City of Cedar Falls</p>

Contributing Factors	Recommended Activities and Goals	Responsible Parties and Partners
Impediment #5: Historic inequalities and negative community perceptions continue to limit opportunity and housing choice		
<p>Less investment in Waterloo compared to Cedar Falls. Economic development in Waterloo is not as cohesive as Cedar Falls, which has more organized placemaking initiatives.</p>	<ul style="list-style-type: none"> • Address public safety concerns through investments in community development and infrastructure. • Explore alternative funding options to create incentives for new development in distressed neighborhoods or other areas of opportunity such as commercial corridors in need of revitalization. • Implement and fund more placemaking/beautification efforts such as promoting local artists through murals, creating wayfinding signage, improve storefronts, etc. 	<p>City of Waterloo</p>
<p>More collaboration and government support are needed for community-based organizations including connecting with diverse populations and youth.</p>	<ul style="list-style-type: none"> • Empower the local youth by creating committees or conducting studies to identify their priorities and needs. Encourage their involvement in decision making regarding the use of grant funds, creating new programs for students, hosting community events, etc. • Support existing community organizations that serve immigrant populations who are in need of skills to find employment or are in need of understanding how various systems/processes work, such as how to start their own entrepreneurial endeavors. 	<p>City of Waterloo City of Cedar Falls Community Partners</p>

<p>Overall low wages throughout the city of Waterloo with multiple tracts where households are low-income</p>	<ul style="list-style-type: none"> • Collaborate with community partners to support resident and employer participation in job search, placement, and training programs. In particular, expand paid job training programs. • Collaborate with residents and community partners to understand barriers to accessing job training programs and employment, and continue to develop and fund strategies to address these barriers. • Invest/expand job training and placement initiatives for individuals with LEP to increase their self-sufficiency and housing stability. 	<p>City of Waterloo</p> <p>Job training and employment assistance programs</p>
<p>Housing discrimination and residential segregation have created limited access to opportunity for specific population groups and communities.</p>	<ul style="list-style-type: none"> • Provide community-wide educational material, workshops, and other resources that address issues regarding diversity, inclusion, and equity. Ensure people are aware of their rights and how to report instances relating to discrimination. 	<p>City of Waterloo</p> <p>City of Cedar Falls</p>

Contributing Factors	Recommended Activities and Goals	Responsible Parties and Partners
Impediment #6: Need for Continued Fair Housing Education		
<p>Stakeholder input and survey responses indicate that more fair housing education is needed for the general public</p>	<ul style="list-style-type: none"> • Either using in-house staff, working through the cities' respective human rights commissions, or using another contracted provider, the cities should annually design and/or update and coordinate delivery of a fair housing education program that reaches the public with information about fair housing rights and responsibilities, how to recognize discrimination, and how and where to file a complaint. <ul style="list-style-type: none"> ○ Ensure targeting to members of the public who are most vulnerable to housing discrimination, including racial and ethnic minorities, low-income populations, people with limited English proficiency, and people with disabilities. ○ Focus efforts on incorporating fair housing education components into other scheduled events (e.g., a fair housing booth at a community or school event) or working through existing organizations with ties to various community groups. ○ Create and distribute materials to all residents of publicly supported housing, especially HCV holders, detailing renters' fair housing rights and landlord obligations for upkeep, maintenance, and repairs, including information on resources for situations in which landlords fail to provide required upkeep and repairs. ○ Provide community-wide educational material, workshops, and other resources that address issues regarding diversity, inclusion, and equity. Ensure people are aware of their rights and how to report instances relating to discrimination. 	<p>City of Waterloo City of Cedar Falls Waterloo Commission on Human Rights Cedar Falls Human Rights Commission Community Partners</p>

<p>Increased planning and coordination is needed for a comprehensive, communitywide fair housing approach</p>	<ul style="list-style-type: none"> • The cities and their respective human rights commissions should schedule a series of planning and strategy sessions, perhaps facilitated by a third-party organizational development consultant, to refine roles and responsibilities related to fair housing and housing discrimination. • A memorandum of understanding signed between the organizations could serve to outline a more strategic and comprehensive approach to fair housing, reducing duplication of effort and positioning each party to work with an area of greatest strength. 	<p>City of Waterloo City of Cedar Falls Waterloo Commission on Human Rights Cedar Falls Human Rights Commission Community Partners</p>
<p>Disparities in rates of homeownership and mortgage applications</p>	<ul style="list-style-type: none"> • A set of promotional materials highlighting homeownership resources should be developed with input and assistance from local lenders familiar with mortgage products for moderate-income homebuyers. • Strategize with lenders and other housing industry professionals on opportunities to deliver promotional materials to low- and moderate-income communities and particularly to racial minorities, whose rates of homeownership and mortgage applications are disproportionately low. 	<p>City of Waterloo City of Cedar Falls Mortgage Lenders Community Partners</p>